

Symetra Investment Services, Inc.

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Symetra Advisory Services Disclosure Document

Disclosure: This brochure provides information about the qualifications and business practices of Symetra Investment Services, Inc. as of September 12, 2011. If you have any questions about the contents of this brochure, please contact us at 800-469-7667 or asksis@symetra.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Reference to SIS as a “registered” entity does not imply certain levels of skill or training.

Additional information about Symetra Investment Services, Inc. is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 19061.

Material Changes in This Version of the Disclosure Document

This Disclosure Document will change from time to time and a new version is issued or made available no less than annually. This Disclosure Document version was issued on September 12, 2011.

Material changes since the last disclosure version and which are discussed in this version include the following: A new description of soft dollar benefits is described in Section 8, Brokerage Practices – Soft Dollar Benefits, which replaces the previous description.

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Advisory Services Disclosure Document

This advisory services disclosure document ("Disclosure Document") presents valuable information to help you understand the investment programs offered through your Investment Advisory Representative before entering into an agreement for advisory services offered by Symetra Investment Services, Inc. Keep this document for future reference. Additional information is available through sources identified on the cover page and in the last paragraph of this Disclosure Document.

1. About Symetra Investment Services, Inc.

Symetra Investment Services, Inc. ("SIS") was established in 1986 and has offered advisory services to the public since 2001. SIS is an investment advisor registered with the Securities and Exchange Commission ("SEC") and provides services to independent Investment Advisor Representatives ("IARs") and their clients. SIS is the sponsor of two platforms, the SIS Advisor Solutions platform ("SAS") and the Wealth Enhancement for Life & Legacy program (the "WELL Plan"), which are each described further in this brochure, and also offers hourly or plan-based financial planning and access to the services of several third party advisors.

As part of its services, SIS is responsible for account administration, fee billing and performance reporting. SIS is a wholly owned subsidiary of Symetra Financial Corporation, a publicly held entity. The Symetra Financial family of companies includes SIS and another non-retail broker/dealer, as well as a life insurance company and several other non-securities-related companies.

The investment recommendations of our IARs are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate

Because some types of investments involve certain additional degrees of risk, they will only be implemented or recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

2. Types of Services

SIS offers clients access to the SIS Advisor Solutions Platform ("SAS"), the Wealth Enhancement for Life & Legacy Program (the "WELL Plan") as well as access to Third Party Advisors and Hourly or Plan-Based Financial Planning. Details regarding the services available in each of these areas are outlined in this section along with applicable information regarding the fees and methods of analysis, investment strategies and risk of loss associated with each offering.

a) SIS Advisor Solutions Platform

The SIS Advisor Solutions (“SAS”) is a suite of comprehensive, integrated wealth management programs which gives IARs and their clients access to a wide range of advisory tools, investment managers and portfolio models available through Envestnet Asset Management, Inc. (“Envestnet”). Envestnet is a financial services platform that enhances an advisory program by providing technology based financial planning tools such as portfolio construction, research resources, automatic portfolio rebalancing, and desk-top reporting. Two custodians are available to house client assets; TD Ameritrade and Pershing (the Custodians). See Section 11 of this brochure for more information on the Custodians.

IARs offering SAS have access to several research sources including Morningstar’s Principia Pro for mutual fund analysis. IARs may use additional SIS-approved research sources to support their analysis and evaluation of investments. Client portfolios will be rebalanced at minimum on an annual basis and depending on the program selected, may be more often.

To establish a client’s account on SAS, the client will enter into an agreement with SIS, their IAR, and Envestnet. The agreement is comprised of a terms and conditions document and an Investment Policy Statement (collectively: “the SAS Agreement”).

SAS Client Choices

SIS tailors the program to individual client’s needs through fact finding and data gathering. Clients in the SAS platform are typically individual investors. The client will complete a questionnaire or questionnaires designed to capture information regarding the client’s risk tolerance, anticipated need for liquidity, investment experience and objectives in order to guide the Investment Advisor Representative (IAR) in determining which specific program within the platform most closely aligns with the client’s investment goals.

Through SAS, the IAR may recommend that the client invest in one or more of the following eight programs:

- (i) separate accounts managed by other investment advisers acting as sub-managers, pursuant to agreements entered into with Envestnet and the sub-manager in Separately Managed Account Program Assets (SMAs);
- (ii) a single account managed by Envestnet pursuant to the directions of one or more sub-managers. These accounts are known as Multi Manager Accounts (MMAs) or Manager Blend Programs (MBPs);
- (iii) a single account for a portfolio customized by their IAR and managed by Envestnet pursuant to the directions of one or more sub-managers. These accounts are referred to as Unified Managed Accounts (UMAs);
- (iv) mutual funds and/or exchange-traded funds (ETFs) available through the SAS in the form of Mutual Fund and ETF Asset Allocation Program Assets. These assets are managed directly by Envestnet or by using one or more investment models available under this Program that were created by investment advisers known as Model Providers. These models consist of mutual funds and/or ETFs and are identified as the Investment Models Program Assets;
- (v) SIS Advisor Portfolios (SAP) is an advisor directed program that allows the IAR to manage client portfolios using asset allocation models on either a non-discretionary or discretionary basis. The program provides management, administration and trading services for investment models consisting of mutual funds, ETFs and/or other securities. The investment choices in each actual model may be limited based on the IAR’s securities licensing.

If the client selects the advisor directed program and wishes to grant discretion, the client will be required to execute a separate limited discretion authorization form. Limited discretionary authority granted by the client and approved by SIS, allows the IAR to invest, reinvest, and otherwise manage the client’s investments consistent with the investment

strategy selected, including authority to direct Envestnet to perform trade implementation and other program account administration services. SIS retains the right to limit or prohibit the granting of discretion by any client to any Advisor.

(vi) Envestnet 's Portfolio Management Consultants select portfolios (PMC) is a series of portfolios comprised predominately of Envestnet's proprietary sub-advised mutual funds;

(vii) alternative investment products available through SAS and managed by their IAR. The investment choices available through the Alternative Investment Product Assets program may be limited based on the IAR's securities licensing.

(viii) SIS Managed Portfolios (SMPs), a proprietary mutual fund/ ETF strategy available only to SIS IARs .

SAS Fees and Compensation

Fees for these programs ("Fees") vary from .30 basis points to 2.50 basis points annually. The fee is to be negotiated between the IAR and the client prior to the execution of the agreement to provide advisory services. Clients must review the SAS Agreement for the particular program they are considering for investment to determine the fee range applicable to the specific program or programs recommended by their IAR.

SAS Fee Detail

The minimums for the SMAs and Mutual Fund and ETF Asset Allocation Programs may vary based on the specific sub-manager chosen. Fees for other specific programs also vary depending upon amount of client assets in the program. Basic fees for each program are outlined here:

SIS Advisor Portfolios (SAP)

Breakpoint	Minimum	Maximum
Up to \$250K	0.30%	2.50%
\$250K-500K	0.30%	2.50%
\$500K-1M	0.29%	2.50%
\$1M-2M	0.28%	2.50%
Above \$2M	0.27%	2.50%

SIS Managed Portfolios (SMPs)

Breakpoint	Minimum	Maximum
Up to \$250K	0.50%	2.50%
\$250K-500K	0.50%	2.50%
\$500K-1M	0.50%	2.50%
\$1M-2M	0.49%	2.50%

\$2M-3M	0.48%	2.50%
Above \$3M	0.48%	2.50%

SMA

Breakpoint	Minimum	Maximum
Up to \$250K	0.60%	2.50%
\$250K-500K	0.60%	2.50%
\$500K-1M	0.65%	2.50%
\$1M-2M	0.63%	2.50%
\$2M-3M	0.62%	2.50%
\$3M-5M	0.62%	2.50%
\$5M-10M	0.60%	2.50%
Above \$10M	0.58%	2.50%

Mutual Fund and ETF Asset Allocation Program including PMC

Breakpoint	Minimum	Maximum
Up to \$250K	0.30%	2.50%
\$250K-500K	0.30%	2.50%
\$500K-1M	0.36%	2.50%
\$1M-2M	0.35%	2.50%
Above \$2M	0.35%	2.50%

MMA or MBP

Breakpoint	Minimum	Maximum
Up to \$250K	0.70%	2.50%
\$250K-500K	0.70%	2.50%
\$500K-1M	0.63%	2.50%
\$1M-2M	0.56%	2.50%
\$2M-3M	0.51%	2.50%

Above \$3M	0.50%	2.50%
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UMA

Breakpoint	Minimum*	Maximum
Up to \$250K	0.40%	2.50%
\$250K-500K	0.40%	2.50%
\$500K-1M	0.40%	2.50%
\$1M-2M	0.40%	2.50%
\$2M-3M	0.40%	2.50%
Above \$3M	0.40%	2.50%

UMA fees also include an additional fee per SMA model ranging from 35 to 60 basis points. Applicable manager fees will apply only when a SMA manager is included in the allocation and those fees will only apply against the particular percentage of the portfolio for which the SMA manager is allocated.

SAP fees do not include certain custodial fees that may be charged to clients by the Custodian or certain brokerage fees or execution fees associated with securities transactions in clients' accounts. Custodial, brokerage and/or execution fees, if applicable, are paid separately by the client.

All Fees will equal, on an annualized basis, a basis point percentage as documented in the SAS Agreement and will be charged based on the fair market value of the client's assets in the applicable program(s). The IAR receives a portion of the Fee in payment for ongoing servicing of the account and for advising the client. SIS retains a portion of the Fee to pay for administration of the program. SIS retains a portion of the Fee on the SMP program to manage and rebalance the portfolios.

SAS Fees and Client Assets

Through the SAS Agreement, the client authorizes SIS to collect the Fee directly from their account(s) at either Custodian. The fee will be debited from the client's account with the Custodian on a quarterly basis in advance. The Fee does not cover certain custodial fees that may be charged to clients by the Custodian or certain brokerage or execution fees associated with securities transactions in clients' accounts. If there is insufficient cash in the account at the time the Fee is to be debited, the IAR or Sub-Manager may sell an amount of the client's assets to generate sufficient cash to pay the Fee. This may create a taxable gain or tax loss for the client.

SAS Fee Payment

If an account is opened in the last month of a calendar quarter, the Fee will be calculated and debited for the remaining period in the calendar quarter plus the next calendar quarter on the day after initial assets are deposited into the program. If the client invests or withdraws \$10,000 or more in any account after the inception of a calendar quarter, the Fee for that quarter will be recalculated and pro-rated as of the day of the additional investment or withdrawal.

The client has the right to cancel the SAS Agreement by submitting written notice of the cancellation to their IAR or to SIS. In such event, any Fees paid by the client shall be refunded to the client pro-rata based on the date of cancellation, taking into account any transactions executed prior to the IAR's or SIS's receipt of the written cancellation notice.

SAS Types of Clients

Clients investing in SAS are typically non-institutional investors; single or joint accounts for qualified and non-qualified money. However, clients can constitute the following definitions:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Corporations or other businesses not listed above
- Pension and profit sharing plans (other than plan participants)
- Charitable institutions, foundations, trusts, and other U.S. institutions

SAS Methods of Analysis, Investment Strategies and Risk of Loss

Each program uses model portfolios which seek to maximize the total return over the long-term, consistent with the risk parameters established for that portfolio. **There is no guarantee of a stated performance of any portfolio or that the portfolio's objectives can be obtained.**

To implement optimal financial solutions to meet client's needs, IARs may conduct asset class analysis of the investment vehicles offered by SIS when populating the models. The objective of this analysis is to identify the investment vehicles offered that cover a range of asset classes based on a number of criteria (e.g. expense ratio, returns, and volatility of returns).

Through SAS, IARs also have access to a variety of Third-Party Asset Managers (TPAMs) as well as Separately Managed Account managers (SMAs). These programs allow the IAR to enter into an agreement with outside managers to manage client assets.

SAS Additional Program Information

Clients in SAS programs may agree that Envestnet or the sub-manager, as applicable, will exercise its discretion in voting ("Proxy") or otherwise acting on all matters for which a security holder vote, consent, election or similar action is solicited by, or with respect to, issuers of securities held in the client's account. The client may revoke this Proxy authority at any time.

Minimum account requirements apply to SAS accounts and vary between \$10,000 and \$25,000. Clients may impose restrictions on their IAR's investment recommendations within SAS.

The terms and conditions, fees, and minimum deposit requirements for each program may vary. The client must carefully review the terms and conditions document and Investment Policy Statement for the program(s) recommended by their IAR. The client must also receive and review Envestnet's Advisory Services Disclosure Document in addition to SIS's prior to determining if participation in any of these programs is right for them. The SAS Agreement must be executed by the client and accepted by SIS and the IAR prior to depositing any assets with the Custodian.

b) The Wealth Enhancement for Life and Legacy Program (the "WELL Plan")

The WELL Plan is a proprietary advisory platform offered since 2001. WELL Plan assets may be invested in mutual funds, ETFs and/or other individual securities managed by the IAR through an Advisor Directed program. The WELL Plan is a non-discretionary platform meaning that the client must take an active and participatory role in all decisions. Investment strategies and methods of analysis for The WELL Plan are based on the same principles and use the same

guidelines as the SAP program described above. As of 12/31/2010, The WELL Plan was valued at approximately \$167,000,000 in assets.

IARs offering the WELL Plan have access to several research sources including Morningstar's Principia Pro for mutual fund analysis. IARs may use additional SIS-approved research sources to support their analysis and evaluation of investments. Client portfolios will be rebalanced at minimum on an annual basis and depending on the program selected may be more often.

The investment choices available through The WELL Plan may be limited based on an IAR's actual securities licensing.

WELL Plan Fees & Compensation

Fees for The WELL Plan may vary and range from .36 to 1.75 basis points on an annualized basis of the fair market value of the client's assets in the WELL Plan. The Fee may be negotiated between the IAR and client prior to execution of the agreement. The IAR receives a portion of the Fee in payment for ongoing servicing of the account and advice to the client. SIS retains a portion of the Fee to pay for administration of the program.

The basic WELL Plan fee schedule is as follows:

Assets of	\$ 1-250,000	1.75%
	250,001 – 500,000	1.60%
	500,001 – 1,000,000	1.45%
	1,000,000 and above	1.25%

Through The WELL Plan Agreement, the client authorizes SIS to collect the Fee directly from their account(s) at the Custodian. The Fee will be debited from the client's account with the Custodian on a quarterly basis in arrears. The Fee does not cover certain custodial fees that may be charged to clients by the Custodian or certain brokerage or execution fees associated with securities transactions in clients' accounts. If there is insufficient cash in the account at the time the Fee is to be debited, the IAR may sell an amount of the client's assets to generate sufficient cash to pay the Fee. This may create a taxable gain or tax loss for the client.

The client has the right to cancel The WELL Plan Agreement by giving written notice of the cancellation to their IAR or SIS. In such event, Fees will be charged immediately to the account pro-rata based on the date of cancellation and any transactions executed prior to the IAR's or SIS's receipt of the written cancellation notice.

WELL Plan Methods of Analysis, Investment Strategies and Risk of Loss

IARs seek to maximize the total return over the long-term, consistent with the risk parameters established for that portfolio. **There is no guarantee of a stated performance of any portfolio or that the portfolio's objectives can be obtained.**

To implement optimal solutions for clients, IARs may conduct asset class analysis of the investment vehicles offered by SIS when populating their models or portfolios. The objective of this analysis is to identify the investment vehicles offered that cover a range of asset classes based on a number of criteria (e.g. expense ratio, returns, and volatility of returns).

WELL Plan Types of Clients

Clients investing in the WELL Plan are typically non-institutional investors; single or joint accounts for qualified and non-qualified money. However, clients can constitute the following definitions:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Corporations or other businesses not listed above
- Pension and profit sharing plans (other than plan participants)
- Charitable institutions, foundations, trusts, and other U.S. institutions

The client will complete a questionnaire or questionnaires designed to capture information regarding the client's risk tolerance, anticipated need for liquidity, investment experience and objectives in order to help the IAR determine which specific program within the platform most closely aligns with the client's investment goals.

WELL Plan Additional Program Information

Clients in the WELL Plan will exercise their sole discretion in voting ("Proxy") or otherwise acting on all matters for which a security holder vote, consent, election or similar action is solicited by, or with respect to, issuers of securities held in the client's account.

A minimum deposit of \$50,000 in assets acceptable to SIS is required for participation in the WELL Plan. Clients may impose restrictions on their IAR's investment recommendations within the WELL Plan.

The client must review the WELL Plan Agreement and the terms and conditions contained therein prior to determining if participation in the WELL Plan is right for them. The Well Plan Agreement must be executed by the client and accepted by SIS and the IAR prior to depositing any assets with the Custodian.

c) Third Party Advisors

In addition to SAS and the WELL Plan, IARs may recommend or select other investment advisors ("Third Party Advisors"). Prior to offering the services of any Third Party Advisor, SIS evaluates the Third Party Advisor based upon many factors including but not limited to their services, variety of investment choices, performance track record, investment strategy or strategies, managers and executives, disclosure documents and publicly available reports on the third party. Currently IARs may offer, recommend or select from the following Third Party Advisors: Genworth Financial, Inc; Curian Capital; CLS; Independent Advisors Group (IAG); SEI and Horizon Investment Services, LLC.

The investment strategies, fees, minimum deposits, minimum investment amounts and other terms and conditions are established by each of the third party advisors mentioned above based on their specific platform and range of services. Minimum initial account deposits vary and may range from \$15,000 to amounts greater than that. Not all third party advisor services are available to clients in all states.

Prospective clients must receive and review each specific third party advisor's Advisory Services Disclosure Document or other disclosure document and client agreement for a complete understanding of the specific fees and terms and conditions of that third party advisor. Clients must review all information carefully to ultimately determine if the services of any third-party advisor offered through SIS meet their needs. The third party advisor's specific client agreement must be executed by the client and accepted by the third party advisor prior to depositing any assets with that third party advisor.

d) Hourly or Plan-Based Financial Planning

Depending on a client's needs, SIS IARs can also provide services on an hourly basis and can produce a comprehensive financial plan for the client to follow. Fees for these services are set by the IAR and will vary depending on the complexity of an hour-based review or the services included in and complexity of a financial plan. Fees may be negotiated between the client and IAR.

Clients wishing to engage an IAR for hourly or plan-based financial planning will execute a Financial Planning Agreement with their IAR. The Financial Planning Agreement clearly defines the scope of expected services, the exact fee for those services and the billing schedule for the services. Upon execution of either an hourly or plan-based agreement the client will receive a copy of the agreement and will receive an invoice or invoices, as applicable, when fees are due and payable per the billing schedule in the Financial Planning Agreement. SIS may recommend, but does not have the authority to determine without obtaining specific client consent, the broker/ dealer used to execute a financial plan.

3. Performance-Based Fees

SIS does not charge performance-based fees for any programs or services listed above.

4. Disciplinary Information

There are currently no pending legal or disciplinary events that SIS deems to be material to a client's evaluation of its advisory services or the integrity of its management. More information about SIS can be found at www.advisorinfo.sec.gov.

5. Financial Industry Activities and Affiliations

SIS is also a broker/dealer registered with the Financial Industry Regulatory Authority ("FINRA") and an insurance agency. SIS's principal business is that of a registered broker/dealer offering securities including mutual funds and variable insurance products.

SIS is a wholly owned subsidiary of Symetra Financial Corporation. The Symetra Financial family of companies includes SIS and another non-retail broker/dealer as well as a life insurance company and several other non-securities-related companies. SIS currently has an agreement with Symetra's life insurance company whereby SIS provides 5 risk-based asset class models, a general investment risk tolerance questionnaire and 5 risk-based sample portfolios for specific life insurance products. These services are provided to support general investor education.

IARs may affect securities transactions for clients as Registered Representatives of SIS's broker/dealer and as such, receive commissions for those activities. Products sold may include variable insurance products offered by SIS's affiliates. Commissions for transactions through SIS's broker/dealer are separate from, and may be in addition to, fees charged by SIS for any investment advisory services provided to those clients. Clients have the option of purchasing the investment product recommended by their IAR through other brokers, not affiliated with SIS.

6. Education, Business Standards and Business Background of SIS IARs and Employees

In accordance with SEC Rule 204A-1, SIS has developed a Code of Ethics that establishes the standards of conduct expected of its IARs and outlines SIS's and those IARs' fiduciary duties. A copy of SIS's Code of Ethics is available to any client or prospective client upon request.

SIS requires that employees and IARs providing investment advice are required to have financial or analytical experience, and to have passed the Uniform Investment Adviser Law Examination (Series 65), and/or other relevant securities examinations. SIS reviews the credentials of IARs and employees involved in determining or giving investment advice based on the conservative mix of North American State Administrators Association ("NASAA") requirements, individual state licensing requirements, other select advisor educational qualifications and tenure in the investment field. Each state has different minimum licensing requirements so potential clients are encouraged to visit the NASAA or their state's web site for more information regarding the applicable licensing and/or education standards for advisors.

The principal executive officers of SIS spend approximately 60% of their time managing and/or supervising the broker/dealer activities of SIS or the activities of other affiliates of SIS and approximately 40% of their time managing and supervising SIS's investment advisory activities.

The educational and professional experience of members of SIS's executive committee is as follows:

Richard Moran, President. Mr. Moran has worked in the investment services industry since 1992. He started his career at Merrill Lynch, Pierce, Fenner & Smith as a financial consultant. He has held senior sales management positions at MassMutual, UBS, Bear Stearns and The Travelers. He has a California life insurance license and FINRA Series 7, 24, and 65 designations. Mr. Moran graduated from the University of Massachusetts with an economics degree.

Joanne M. Salisbury, VP, Chief Compliance Officer. Joanne has worked in the investment services industry for over 25 years. She has held executive positions as Chief Financial Officer, Chief Operating Officer, Chief Operations Officer and Vice President in a variety of full-service, online, self clearing and fully disclosed securities firms for over 25 years. Joanne also established and operated Salisbury Consulting, Inc. a successful full-service consulting firm for financial and legal professionals. Joanne is a registered General Securities Representative (Series 7 and 63), General Securities Principal (Series 24), Financial & Operations Principal (Series 27), Municipal Securities Principal (Series 53), Investment Advisor (Series 65), Options Principal (Series 4) and Equity Trader Limited Representative (Series 55). She maintains memberships in the Securities Industry Association for Financial Professionals, the National Society of Compliance Professionals, and The Northwest Securities Management Association.

Jeff Malone, CFA. Jeff has worked in the investment services industry for over 13 years. He previously counseled clients and advisors on investment alternatives and asset allocation in his roles with a mutual fund company and a broker-dealer. Before joining Symetra, he managed portfolios for high net worth clients and foundations within the fiduciary platform of a regional bank. Jeff is a CFA charter holder and has the Series 7, 63 and 24 securities licenses. He is a member of the CFA Institute, the Seattle Society of Financial Analysts and is also a graduate of the University of Washington with a degree in finance.

Thomas Kowalczyk, Advisory Services Manager. Thomas has worked in the investment services industry for over 5 years. He received his B.A from Boise State University in Boise, ID and later an MBA in Financial Management from City University of Seattle in Seattle, WA. Mr. Kowalczyk has the series 7, 24, and 66 FINRA certifications and also holds the life and disability insurance license. He is a level II CFA candidate.

7. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

SIS and its IARs are obligated to act in the best interest of all clients and to place clients' interests before their own. IARs recognize that they may be fiduciaries and have fiduciary responsibilities to their clients. SIS and its IARs are obligated to proactively avoid conflicts of interest and compromising situations.

Fiduciary Responsibility is defined as: An obligation to act in the best interest of another party. For instance, a corporation's board member has a fiduciary duty to the shareholders, a trustee has a fiduciary duty to the trust's beneficiaries, and an IAR has a fiduciary duty to a client he is advising.

When an IAR undertakes to act for a client, the law and regulations forbid him, as the fiduciary, from acting in any manner adverse or contrary to the interests of the client, or from acting for his own benefit in relation to the subject matter. The client is entitled to the best efforts of the fiduciary on their behalf and the fiduciary must exercise all of the skill, care and diligence at his disposal when acting on behalf of the client.

As a fiduciary, IARs are required to make truthful and complete disclosures to those placing trust in them, and they are prohibited from obtaining an unreasonable advantage at the client's expense.

IARs recommending SIS's advisory services to clients receive compensation as a result of the client's participation. That compensation may be more than what the IAR would receive if the client paid separately for investment advice, brokerage and other services. The IAR may have a financial incentive to recommend one program over other programs or services. Clients must consider the value of the services being delivered and determine if he or she is better served by paying fees associated with any advisory program or paying for services separately (e.g. paying commissions based on trading activity). SIS's IARs, principals and employees may perform advisory services for various other clients and may give advice or take actions for those clients that differ from the advice given or the timing or nature of any action taken for other clients.

8. Brokerage Practices

IARs may affect securities transactions for clients as Registered Representatives of SIS's broker/dealer and as such, receive commissions for those activities. Commissions for transactions through SIS's broker/dealer are separate from, and may be in addition to, fees charged by SIS for any investment advisory services provided to those clients. Clients have the option of purchasing the investment product recommended by their IAR through other brokers not affiliated with SIS.

Soft Dollar Benefits

SIS participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. SIS receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, SIS participates in TD Ameritrade's institutional customer program and SIS may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between SIS's participation in the program and the investment advice it gives to its Clients, although SIS receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving SIS participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to SIS by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by SIS's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit SIS but may not benefit its Client accounts. These products or services may assist SIS in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help SIS manage and further develop its business enterprise. The benefits received by SIS or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, SIS endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by SIS or its related persons in and of itself creates a potential conflict of interest and may indirectly influence SIS's choice of TD Ameritrade for custody and brokerage services.

SIS also receives from TD Ameritrade certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the Additional Services include PortfolioCenter, Finance Ware, & Morningstar/Principia.

TD Ameritrade provides the Additional Services to SIS in its sole discretion and at its own expense, and SIS does not pay any fees to TD Ameritrade for the Additional Services. SIS and TD Ameritrade have entered into a separate agreement (“Additional Services Addendum”) to govern the terms of the provision of the Additional Services.

SIS’s receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to SIS, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, SIS’s Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with SIS, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, SIS may have an incentive to recommend to its Clients that the assets under management by SIS be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. SIS’s receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

9. Review of Accounts

While the underlying securities within client accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

The IAR provides specific advice to the client concerning the client’s investment strategy for each account. Clients are provided with periodic custodial reports from their chosen custodian and the IAR provides the client with quarterly performance reports, billing statements and other reports for each of their accounts. The periodic custodial reports include a listing of all investments in the client’s account, their current valuation, and a listing of all transactions occurring during the period. The quarterly performance reports include information concerning the allocation of assets in each client account among various asset classes and the investment performance of the client’s account during the quarter.

SIS has systems and procedures in place to periodically review all advisory accounts. Reviews may also be triggered by changes in an account’s activity level, changes in a portfolio’s investment performance or changes in a client’s financial status, investment objectives or risk tolerance or at the client’s request. SIS at its sole discretion may terminate an advisory services agreement and cease fee debits or rebate some or all previously debited fees if it deems at any time that an account is not appropriate for the fee based program selected.

10. Client Referrals and Other Compensation

It is SIS policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

11. Custodial Arrangements

SIS uses the services of TD Ameritrade and Pershing, LLC as Custodians for assets in its proprietary platforms. Administrative fees and the investment choices offered by each Custodian may differ. Clients should discuss the various services offered by each Custodian as well as the potential fees associated with each with their IAR in order to select the Custodian that best fits their needs.

Pershing, LLC provides among its available services: custody, recordkeeping services, execution, clearance and settlement of transactions and access to mutual funds with no transaction fees as well as access to stocks, bonds, options and other investment vehicles that may be used by the IAR to populate a model or portfolio. TD Ameritrade also offers custody, recordkeeping services, execution, clearance and settlement of transactions and access to mutual funds with no transaction fees that may be used by the IAR to populate a model or portfolio. In addition to performance information produced by their IAR, clients can expect to receive periodic account statements from the Custodian which include a listing of all investments in the client's account, their current valuation, and a listing of all transactions occurring during the period. Both Custodians also produce and deliver purchase and sale confirmations to the client promptly after each transaction effected by the IAR. Clients should compare account statements received from the Custodian with quarterly performance reports received from their IAR.

When a Custodian is chosen, the IAR will present the client with the separate custodial agreement to be executed between the client and custodian. The separate custodial agreement must be executed before assets may be deposited or purchases or sales effected for the client.

12. Investment Discretion

If the client selects the advisor directed program, the client may execute a separate limited discretion authorization form. Limited discretionary authority granted by the client and, if approved by SIS, allows the IAR to invest, reinvest, and otherwise manage the client's investments consistent with the investment strategy selected, including authority to direct Investnet to perform trade implementation and other program account administration services.

SIS retains the right to limit or prohibit the grant of discretion by any client to any Advisor.

13. Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business. We may also recommend the use of a third party proxy voting service if the client does not wish to vote their own proxies.

14. Financial Information

SIS has no additional financial circumstances to report. Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement. SIS has not been the subject of a bankruptcy petition at any time during the past ten years.

Disclosure: This brochure provides information about the qualifications and business practices of Symetra Investment Services, Inc. as of September 12, 2011. If you have any questions about the contents of this brochure, please contact us at 800-469-7667 or asksis@symetra.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Reference to SIS as a “registered” entity does not imply certain levels of skill or training. Additional information about Symetra Investment Services, Inc. is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 19061.