

Part 2A of Form ADV: *Firm Brochure*

Symetra Investment Services, Inc.

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June 27, 2013

Symetra Advisory Services Disclosure Document

Disclosure: This brochure provides information about the qualifications and business practices of Symetra Investment Services, Inc. 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.

Item 2

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 June 27, 2013.

Material changes since the last annual disclosure on March 04, 2013 and which are discussed in this version include the following:

- We have updated the list of SIS's executive team.

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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.

Item 4

Advisory Business

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 sponsors a variety of advisory programs, as well as hourly or plan-based financial planning and access to the services of several third party advisors. Those programs and services are each described further in this brochure as well as in our Form ADV part 2A appendix 1 wrap brochure,

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

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.

Types of Services

SIS offers clients access to the SIS Advisor Solutions Platform (Advisor Solutions), 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.

Advisor Solutions 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 hold client assets; TD Ameritrade and Pershing (the Custodians).

In addition, SIS offers the SIS Advisory Pathways (Advisory Pathways) program (formerly called the Wealth Enhancement for Life and Legacy or “WELL” program). Program assets may be invested in mutual funds, ETFs and/or other individual securities managed by the IAR through an advisor directed program.

IARs 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.

To establish a client’s account in one of our Advisor Solutions programs, the client enters 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 Advisor Solutions Agreement). Client accounts managed off the Advisor Solutions platform under the Advisor Pathways program will enter into an advisory agreement with SIS and their IAR.

SIS offers both wrap and non-wrap programs. A wrap program is one in which the client pays a single “wrapped” fee for both investment advisory and brokerage execution services. This wrap fee is not based on the number of transactions made in the account but is based on the asset value of the account(s). In both our wrap and non-wrap programs, SIS receives a portion of the fees paid. Information on these wrap programs can be found in our ADV part 2A appendix 1 Wrap Brochure.

Certain of the non-wrap programs that SIS offers are described below. Other non-wrap programs and wrap fee programs offered are described in separate brochures that the client’s IAR can provide upon request. Some non-wrap programs that are offered are similar to the wrap programs. The IAR will work with the client to decide which program will best serve the client’s needs.

SIS Advisor Pathways

Advisor Pathways 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.

SIS also offers a wrap version of the Advisor Pathways program. Transaction charges are associated with the purchase and sale of each security in the non-wrap version of the Advisor Pathways program, but it has a lower program fee. Depending on the trading activity in the account and the type of securities purchased and sold, the non-wrap version may be less expensive for the client. The IAR and client should carefully discuss which version of the Advisor Pathways program would suit the client’s needs better. In both wrap and non-wrap programs, SIS will receive a portion of the fees paid. More information on the wrap version of Advisor Pathways can be found in the ADV part 2A appendix 1 Wrap Brochure.

Third Party Advisors

In addition to the programs listed above, 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, Trutina Financial 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.

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.

Program Managed Assets

Discretionary assets are assets over which SIS or the IAR has authority to determine whether to buy or sell securities. This authority is called a trading authorization and is described in more detail in Item 16 - Investment Discretion. Non-discretionary assets are assets in accounts that we provide recommendations on, as to the purchase or sale of specific securities. We do not place orders to buy or sell non-discretionary assets without first receiving your authorization.

As of December 31st, 2012, SIS managed:

Discretionary Assets: \$197,122,501

Non-Discretionary Assets: \$137,635,967

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Fees and Compensation

The appropriate program or financial planning 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 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.

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 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.

Through the Agreements, 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 or 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. Please see Item 12 of this brochure for more information on brokerage practices. 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.

For accounts that bill in advance, the following will apply. 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 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.

Through The Advisor Pathways (formerly WELL program) 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. Please see Item 12 of this brochure for more information on brokerage practices. 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 Advisor Pathways 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.

The advisory fee is generally split between a program (or platform) fee and a management fee.

Program fees will vary depending on which programs are selected. The program fee described in this brochure is paid to SIS. The program fee is not negotiable, but the program fee may be different depending on the IAR's relationship with SIS. An example of this would include an IAR qualifying for a lower program fee based on his clients' combined accounts exceeding a certain assets under management threshold.

A portion of the management fee is paid to the IAR servicing the account. The client and IAR will negotiate this fee for each program account and it may differ from account to account. SIS retains a portion of the management fee for various services we provide to the client and IAR.

The total advisory fee is the sum of the program and management fee. At any time the client or IAR may agree to amend the original fee by submitting a new Investment Policy Statement. There are maximum allowable advisory fees for each program. The maximum allowable advisory fees are consistent across all IARs and are stated below.

Accounts established under Advisor Pathways are subject to the following maximum fee schedule table.

Account Size	Maximum Client Fee
Up to \$250,000	1.75%
\$250,000 - \$500,000	1.60%
\$500,000 - \$1,000,000	1.45%
Over \$1,000,000,	1.25%

The following table details the advisory fee schedule maximums for the non-wrap version of Advisor Pathways. The management fee may be discounted upon agreement of the client and IAR. IARs may have an agreement with SIS for program fees less than amounts listed below.

Account Size	Program Fee (Annual)	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
Up to \$250,000	0.20%	0.00% - 2.30%	0.20% - 2.50%
\$250,000 - \$500,000	0.19%	0.00% - 2.31%	0.19% - 2.50%
\$500,000 - \$1,000,000	0.18%	0.00% - 2.32%	0.18% - 2.50%
\$1,000,000 - \$2,000,000	0.17%	0.00% - 2.33%	0.17% - 2.50%
Over \$2,000,000	0.16%	0.00% - 2.34%	0.16% - 2.50%

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Performance-Based Fees

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

Item 7

Types of Clients

Typical SIS clients include individuals, pension and profit sharing plans, corporations and other business organizations, trusts, estates and charitable organizations. Clients may have both advisory and brokerage accounts. IARs may offer you brokerage services, advisory services or both.

Program minimums vary depending on the program selected, but are generally between \$10,000 and \$250,000. SIS generally will not accept accounts that do not meet all applicable minimums. However, exceptions to the account minimum may be made at SIS discretion. If an account falls below the minimum amount, the account is subject to termination at our discretion. Clients may add acceptable assets at any time.

Item 8

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.** Investing in securities involves risk of loss and clients should be prepared to bear that risk.

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 the Advisor Solutions program, IARs also have access to a variety of Third Party Strategists (Strategist) 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.

Item 9

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.adviserinfo.sec.gov.

Item 10

Other 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.

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:

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 has FINRA Series 4, 7, 24, 27, 53, 55, 63 and 65 licenses. She has been awarded the Fellow, Life Management Institute (FLMI) designation and the Associate, Insurance Regulatory Compliance (AIRC) designations and maintains memberships in the Securities Industry Association for Financial Professionals, the National Society of Compliance Professionals, and The Northwest Securities Management Association.

Thomas Kowalczyk, Director of Advisory Services. Kowalczyk joined Symetra in February of 2006. He has held a variety of positions within the company, including roles in advanced markets, sales and marketing and most recently as the product manager for asset management and retirement income programs. 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 licenses and also holds a WA state life and disability insurance license.

Item 11

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

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.

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. The IAR may invest in or own securities that are also recommended to Clients. 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.

Item 12

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.

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' 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' 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' 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 Envestnet.

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' 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' 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' 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.

Item 13

Review of Accounts

While the underlying securities within client accounts are continually monitored, accounts themselves are generally reviewed on a quarterly basis. 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.

Item 14

Client Referrals and Other Compensation

IARs may act as Solicitors under some programs. Solicitors are individuals who introduce clients to an investment adviser with which the solicitor is not affiliated. Solicitor's arrangements allow the individual to receive compensation for referring a client. The compensation paid to a solicitor is a portion of the advisory fee paid by the client. All solicitation arrangements must be pre-approved by SIS.

SIS IARs have the ability to refer, or "solicit," clients to other investment advisers. IARs can solicit advisory business for both affiliated investment advisers and unaffiliated investment advisers. Unaffiliated investment advisers must be approved by us before any IARs are permitted to refer clients to them. If IARs are soliciting advisory business for any investment adviser, this will be disclosed to you through a disclosure statement and a written acknowledgement. The investment advisers that we solicit for provide a variety of management services, as outlined in each investment adviser's disclosure brochure. In general, they provide management strategies and investment models to advisory clients. The investment adviser will pay a portion of the advisory fee, as disclosed in the written acknowledgement, to SIS for soliciting clients. SIS will share a portion of this fee with the client's IAR. In exchange for this fee, the IAR is providing services including investor profiling, selection of managers, and ongoing account monitoring.

Item 15

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, stocks, bonds, and options 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.

Item 16

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 Envestnet 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.

Item 17

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.

Item 18

Financial Information

SIS has no additional financial circumstances to report. Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement as part of this Disclosure Document. SIS has not been the subject of a bankruptcy petition at any time during the past ten years.

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