

## **Symetra Investment Services, Inc.**

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July 30, 2013

### **Symetra Advisory Services Wrap Fee Disclosure Document**

**Disclosure:** This wrap fee program 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](mailto: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](http://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 July 30, 2013.

Material changes since the last annual disclosure on March 4, 2013 and which are discussed in this version include the following:

- Updated the list of SIS’s executive team
- Added Brokerage Practices section to Item 9

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## Item 4

### **Services, Fees and Compensation**

#### **General Information:**

Symetra Investment Services, Inc. (SIS) is a sponsor of a variety of advisory programs through our SIS Advisor Solutions platform. This wrap brochure details the programs available through the Advisor Solutions platform. Envestnet Asset Management, Inc. (Envestnet) provides the technology platform for all Advisor Solutions platform accounts. Envestnet is an unaffiliated registered investment advisor.

**SIS offers both wrap and non-wrap programs. A wrap program is one in which you pay 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. It is based on the asset value of the account(s). This brochure discusses only wrap programs but should be accompanied by SIS’s Form ADV Part II which generally discusses all advisory programs and services available through SIS.**

Regardless of which advisory program or service chosen, the Investment Advisor Representative (IAR) will work with the client to collect suitability information that will aid in the creation of recommendations. This suitability information is maintained on internal systems and documents. The IAR is required to submit the completed suitability information to his supervisor for review and approval. It is your responsibility to notify your IAR if your financial circumstances change so that your IAR may work with you to determine if a change in your investment(s) may benefit you. Your IAR is also responsible for the ongoing review of your account(s) and regular communication with you. Our IARs provide investment advice only with respect to limited types of investments.

SIS tailors the program to individual client’s needs through fact finding and data gathering. Clients in the Advisor Solutions 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 IAR in determining which specific program within the platform most closely aligns with the client’s investment goals.

SIS is not a custodian of any accounts. Accounts for the programs on the Advisor Solutions platform are custodied at Pershing, LLC (Pershing) or TD Ameritrade Institutional (TDA). Accounts for non-wrap programs offered by SIS are also custodied at Pershing and TDA. Pershing and/or TDA will provide the client with confirmations of all transactions and monthly or quarterly account statements. Clients may have the option of directing Pershing and/or TDA to not send confirmations. Confirm suppression will not impact delivery of account statements.

#### **Fee Overview:**

The fees that paid for advisory programs or services will depend on several different factors. The fees for advisory programs are generally based on the “Assets under Management.” This means that the account is charged a fee based on the account balance as of a certain date. These fees are negotiable between the client and the IAR offering the service.

The advisory programs described in this brochure charge an advisory fee, charged quarterly, based on the account’s balance on the last day of each calendar quarter (March 31, June 30, September 30, and December 31). If the last day of

the calendar quarter falls on a day that the New York Stock Exchange is closed, we use the account balance on the last business day of the calendar quarter to calculate the advisory fee. This fee is generally charged in advance (or pre-paid) for the management to be provided over the next calendar quarter. We will only charge an advisory fee for the portion of a quarter that the account is under management. For new accounts, we will bill the account when it is opened for the remaining days in the quarter. For accounts that are terminating management, we will automatically credit back any pre-paid fees for the portion of the quarter remaining after management has terminated. Advisory fees are generally deducted from the account. The account statements you receive from Pershing and/or TDA will reflect the deduction of these fees. Fees are deducted from the account in the month following quarter end.

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 and is split between SIS, Envestnet and the various Strategists or investment managers being utilized. 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.

Program fees will also vary based on the investment managers or Strategists selected. This difference will not affect the advisory fee paid to SIS and or the IAR, but it does present a conflict of interest in that the IAR may benefit from selecting certain Strategists or investment managers with lower fees. SIS attempts to moderate this conflict of interest by ensuring that the fees charged by the Strategists and investment managers are reasonable and competitive for the services provided.

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.

#### **SIS Advisors Pathways (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.

**As mentioned previously, SIS also offers a non-wrap version of the Advisor Pathways program. The non-wrap version of the Advisor Pathways program has transaction charges associated with the purchase and sale of each security, 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 should consider which version of the Advisor Pathways program would suit the client better. In both wrap and non-wrap programs, SIS will receive a portion of the fees paid.**

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.

The minimum account size for the wrap version of the Advisor Pathways program is \$25,000. The following table details the advisory fee schedule maximums for the 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	0.35%	0.00% - 2.15%	0.35% - 2.50%
\$250,000 - \$500,000	0.33%	0.00% - 2.17%	0.33% - 2.50%
\$500,000 - \$1,000,000	0.31%	0.00% - 2.19%	0.31% - 2.50%
\$1,000,000 - \$2,000,000	0.29%	0.00% - 2.21%	0.29% - 2.50%
Over \$2,000,000	0.28%	0.00% - 2.22%	0.28% - 2.50%

### SIS Guided Pathways (Guided Pathways)

The Guided Pathways program allows the client and IAR to select from one or more of several different Strategists to manage the advisory accounts. SIS offers several Strategists to give you access to a variety of investment models. These models consist of mutual funds and/or exchange-traded funds (ETFs). The client and IAR will choose one or more of the available investment models.

For more information about each Strategist, please review the strategists Form ADV disclosure brochure, which can be provided by the IAR.

The minimum account size for Guided Pathways will vary depending on the Strategist selected, but is generally \$50,000. The following table details the range of advisory fees for Guided Pathways and will vary depending on the Strategists selected.

Account Size	Program Fee (Annual)	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
Up to \$250,000	0.10% - 0.95%	0.00% - 2.40%	0.10% - 2.50%
\$250,000 - \$500,000	0.10% - 0.93%	0.00% - 2.40%	0.10% - 2.50%
\$500,000 - \$1,000,000	0.10% - 0.90%	0.00% - 2.40%	0.10% - 2.50%
\$1,000,000 - \$2,000,000	0.10% - 0.87%	0.00% - 2.40%	0.10% - 2.50%
Over \$2,000,000	0.10% - 0.85%	0.00% - 2.40%	0.10% - 2.50%

### SIS Managed Pathways (Managed Pathways)

The Managed Pathways program allows the client and the IAR to select from several investment models managed by Envestnet and Portfolio Management Consultants (PMC). These investment models utilize either mutual funds or ETFs and are managed to specific risk tolerance ranges. The client and IAR will choose one or more of the available investment models.

The Managed Pathways models utilizing mutual funds are only available when assets are custodied with Pershing. The mutual fund models utilize only FundVest or No-transaction fee mutual funds.

The minimum account size for the Managed Pathways program is \$50,000 for the mutual fund portfolios and \$25,000 for the ETF portfolios. The following tables detail the range of advisory fees for both the Managed Pathways mutual fund portfolios and ETF portfolios.

#### Mutual Fund Portfolios

Account Size	Program Fee (Annual)	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
Up to \$1,000,000	0.35%	0.00% - 2.15%	0.35% - 2.50%
\$1,000,000 - \$5,000,000	0.33%	0.00% - 2.17%	0.33% - 2.50%
\$5,000,000 - \$10,000,000	0.31%	0.00% - 2.19%	0.31% - 2.50%
Over \$10,000,000	0.29%	0.00% - 2.21%	0.29% - 2.50%

#### ETF Portfolios

Account Size	Program Fee (Annual)	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
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Up to \$500,000	0.45%	0.00% - 2.05%	0.45% - 2.50%
\$500,000 - \$1,000,000	0.44%	0.00% - 2.06%	0.44% - 2.50%
\$1,000,000 - \$5,000,000	0.41%	0.00% - 2.09%	0.41% - 2.50%
\$5,000,000 - \$10,000,000	0.39%	0.00% - 2.11%	0.39% - 2.50%
Over \$10,000,000	0.37%	0.00% - 2.13%	0.37% - 2.50%

### SIS Unified Managed Account Program (UMAP)

UMAP allows the client and IAR to create a single account portfolio which utilizes Separately Managed Accounts (SMA), ETFs, mutual funds or Strategists. The overlay manager is typically responsible for initially allocating the assets and then monitoring and rebalancing among the investments selected.

The minimum account size for the UMAP program is \$150,000. Additional Sub-Advisor fees per SMA and Strategist will apply only when included in the allocation, and those fees will only apply against the particular percentage of the portfolio for which the manager is allocated. The following table details the range of advisory fees for UMAP.

Account Size	Program Fee (Annual)	Sub-Advisor (Annual)*	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
Up to \$500,000	0.30%	0.10% - 0.70%	0.00% - 2.10%	0.40% - 2.50%
\$500,000 - \$2,000,000	0.28%	0.10% - 0.70%	0.00% - 2.12%	0.38% - 2.50%
\$2,000,000 - \$5,000,000	0.26%	0.10% - 0.70%	0.00% - 2.14%	0.36% - 2.50%
Over \$5,000,000	0.25%	0.10% - 0.70%	0.00% - 2.15%	0.35% - 2.50%

\*Sub-Advisor fees will generally be in this range but will vary depending on the SMA or Strategist selected.

### SIS Separately Managed Accounts (SMAs)

SMAs are accounts managed by investment managers acting as sub-managers. Unlike mutual funds, where assets are pooled with those of other investors, SMAs provide direct ownership of the individual securities and ETFs within the SMA portfolio. This may provide greater customization of the portfolio.

The minimum account size for SMAs is generally \$100,000, but it is dependent on the SMA selected. The following table details the typical range of advisory fees for the SMA program. The program fee will be dependent upon which SMA is selected.

Account Size	Program Fee (Annual)	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
Up to \$250,000	0.65% - 1.05%	0.00% - 1.85%	0.65% - 2.50%
\$250,000 - \$500,000	0.65% - 1.04%	0.00% - 1.86%	0.65% - 2.50%
\$500,000 - \$1,000,000	0.65% - 1.03%	0.00% - 1.87%	0.65% - 2.50%
\$1,000,000 - \$2,000,000	0.65% - 1.02%	0.00% - 1.88%	0.65% - 2.50%
Over \$2,000,000	0.65% - 1.02%	0.00% - 1.88%	0.65% - 2.50%

### SIS Multi-Manager Accounts (MMA)

MMA accounts allocate client assets in accordance with pre-determined models in various asset classes. Assets are directly invested in within each asset class by a separate manager. An overlay manager is typically responsible for initially allocating within each asset class and monitoring and rebalancing among the asset classes. There are MMA models available (Moderate, Moderate Growth, Growth and Aggressive).

The minimum account size for the MMA program is \$250,000. The program fee includes individual manager fees. The following table details the range of advisory fees for the MMA program.

Account Size	Program Fee (Annual)	Management Fee Range (Annual)	Total Advisory Fee Range (Annual)
Up to \$250,000	0.85% - 1.00%	0.00% - 1.50%	0.85% - 2.50%
\$250,000 - \$500,000	0.84% - 0.99%	0.00% - 1.51%	0.84% - 2.50%
\$500,000 - \$1,000,000	0.78% - 0.93%	0.00% - 1.57%	0.78% - 2.50%
\$1,000,000 - \$2,000,000	0.72% - 0.87%	0.00% - 1.63%	0.72% - 2.50%

Over \$2,000,000	0.67% - 0.82%	0.00% - 1.68%	0.67% - 2.50%
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### **Additional Information about Fees**

All management fees listed above are negotiable, subject to the maximum amount set forth above and are charged on a per account basis. The cost of the services provided through the Advisor Solutions platform may be more or less than the cost of purchasing similar services separately. Among the factors impacting the cost of the program are the account size, type of account registration (e.g., retirement), nature of services provided, amount of assets specific to a particular strategy and the particular service or third-party manager selected.

At times, IARs who recommend services in the Advisor Solutions program may receive compensation as a result of client participation in the Advisor Solutions program. This compensation may be more than what the IAR would receive if the client participated in other programs or services, or paid separately for investment advice, brokerage and other services. Therefore, IARs may have a financial incentive to recommend the Advisor Solutions program over other programs or services. An IAR may receive additional economic benefit as a result of business in the form of reduced charges for the platforms and services made available to the IAR for use with their clients. These reduced charges may be based upon the aggregate amount of assets of the IAR's clients that utilize the platforms and services. An IAR may therefore have a financial incentive to recommend the Advisor Solutions program over other platforms or services we provide.

Other costs that may be assessed that are not part of the Advisor Solutions Program Fee include fees for portfolio transactions executed by third-party managers away from Pershing or TDA, dealer mark-ups, electronic fund and wire transfers, spreads paid to market-makers, dealer mark-ups, market maker spreads and exchange fees, among others. Any and all brokerage account fees, including retirement account annual custodial fees apply to each of your accounts. The above listed amounts do not include other amounts, such as the initial and ongoing expenses paid to third-party investments or third-party pooled investment vehicles, such as mutual funds, annuities or alternative investments. Such expenses are usually set forth in the applicable offering document of the investment, such as a prospectus for a mutual fund, and are payable by the client.

## **Item 5**

### **Account Requirements and Types of Clients**

Program minimums vary depending on the program selected, but are generally between \$10,000 and \$250,000. SIS generally will not allow 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 assets at any time.

Our clients generally 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.

## **Item 6**

### **Portfolio Manager Selection and Evaluation**

Through our relationship with Envestnet, we rely primarily on Envestnet to identify prospective managers and to perform due diligence on such managers that may be selected through the Advisor Solutions platform. Managers are typically evaluated based on data and information from various third-party sources, such as independent databases, and from the particular manager. Among the information collected and analyzed are historical performance, investment philosophy, investment style, historical volatility and correlation across asset classes. Details of Envestnet's review process can be found in their firm's ADV Part II brochure.

To the extent Envestnet has not performed the research and due diligence on a third-party manager; we will review the third-party through our internal due diligence process. Managers are typically evaluated based on data and information from various third-party sources, such as independent databases, and from the particular manager. Among other things, our process entails examining items such as the disclosure Brochure on Form ADV, Part 2A of the manager, any applicable offering document, performance reports and other information as deemed necessary to help determine the third-party's investment strategy. SIS will also attempt to verify information by comparing it to publicly available sources.

IARs are also responsible for the selection of any third-party investments or investment vehicle based upon a client's specific situation, requirements and suitability. IARs will recommend the replacement of any third-party investments or investment vehicle consistent with their duties as a fiduciary under applicable law.

SIS does not typically review performance information of third parties and performance information may not be calculated on a uniform or consistent basis among each third-party manager. Further, third parties may not calculate performance in accordance with any industry standard.

SIS and its IARs do not act as portfolio manager for any wrap programs.

#### **Item 7**

##### **Client Information Provided to Portfolio Managers**

For most advisory programs, the information that we provide to third-party managers varies by manager. For the wrap programs described in this brochure, client information is only provided to Envestnet and any third-party managers servicing the account. This information is limited to what the client completes on their application forms for the wrap program.

#### **Item 8**

##### **Client Contact with Portfolio Managers**

Clients may be restricted in their ability to directly contact and consult with the Strategists, investment managers and Envestnet regarding their accounts. The client's IAR will be available to address any questions, issues or concerns regarding the Strategists, Investment Managers, or Envestnet.

#### **Item 9**

##### **Additional Information**

###### **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](http://www.adviserinfo.sec.gov).

###### **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.

### **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.

### **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.

### **Brokerage Practices**

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.

#### **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.

**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 wrap brochure provides information about the qualifications and business practices of Symetra Investment Services, Inc. as of March 04, 2013. If you have any questions about the contents of this brochure, please contact us at 800-469-7667 or [asksis@symetra.com](mailto: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](http://www.adviserinfo.sec.gov).