

Wealth Management Analysis Report

Brochure

October 1, 2018

**Merrill Lynch, Pierce, Fenner &
Smith Incorporated**

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This brochure provides information about the qualifications and business practices of Merrill Lynch, Pierce, Fenner & Smith Incorporated ("Merrill Lynch") relating to the Merrill Lynch Wealth Management Analysis Report and Estate and Insurance Report. If you have any questions about the contents of this brochure, please contact us at 800.Merrill (800.637.7455). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission "SEC" or by any state securities authority. Investment adviser registration does not imply a certain level of skill or training.

The advisory services described in this brochure are not insured or otherwise protected by the Federal Deposit Insurance Corporation or any other government agency; are not an obligation of any bank or any affiliate of Merrill Lynch; are not endorsed or guaranteed by Bank of America, N.A., Merrill Lynch, or any bank or any affiliate of Merrill Lynch; and involve investment risk, including possible loss of principal.

Additional information about Merrill Lynch also is available on the SEC's website at www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_Search.aspx.

MATERIAL CHANGES

On March 26, 2018, Merrill Lynch filed its last annual update for the Wealth Management Estate and Insurance Analysis Report ("Brochure" or "Disclosure Statement"). Set forth below is a summary of the material changes to this Brochure since that date. This summary of material changes is designed to make clients aware of information that has changed since the Brochure's last annual update that may be important to them. The material changes summarized below were also incorporated within this Brochure. Capitalized terms that are not defined in this Brochure have the meanings provided in the Glossary.

The following was added to "Disciplinary Information."

On August 20, 2018, the SEC announced that MLPF&S, without admitting or denying the findings, entered into a settlement related to willful violations of Sections 206(2) and 206(4) of the Advisers Act and Advisers Act Rule 206(4)-7. Specifically, the SEC's administrative order found: (1) a failure to disclose that the portfolio manager process employed in connection with a January 2013 termination recommendation was exposed to a conflict of interest (less than one-seventh (1/7) of 1% of total advisory accounts (approximately 1,500) were invested in the products subject to the termination recommendation); and (2) a failure to adopt and implement written policies and procedures reasonably designed to prevent violations of the Advisers Act. In determining the appropriate sanctions, the SEC considered Merrill Lynch's remedial acts promptly undertaken and cooperation afforded the SEC staff. Merrill Lynch consented to the imposition of a cease-and-desist order, a censure, and disgorgement and a financial penalty totaling approximately \$8.8 million.

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ADVISORY BUSINESS

This Brochure describes the service as further described below, which consists of delivery of various Wealth Management Analysis reports, which are offered by Merrill Lynch, Pierce, Fenner & Smith Incorporated ("Merrill Lynch," "MLPF&S," "we," "us," or "our"), an indirect wholly-owned subsidiary of Bank of America. Clients are referred to as "Client" or "You." All capitalized terms are defined in the body of this Brochure and/or in the Glossary, which can be found at the end of this Brochure.

WEALTH MANAGEMENT ANALYSIS REPORTS AND ESTATE AND INSURANCE ANALYSIS REPORT

The Wealth Management Analysis Report is a report that we may provide to brokerage customers which consists of a number of optional components. The reports are designed to assist clients in the area of wealth management. We prepare the reports by analyzing various aspects of your current financial situation, which may include your net worth, income tax, asset allocation, cash flow, estate tax and planning, survivor and wealth protection, disability income and long term care expense protection.

The Estate Report, Insurance Report (or if delivered together, the Estate and Insurance Report), are each optional components of a Wealth Management Analysis Report that we may provide to brokerage customers designed to assist them in the area of personal insurance and estate planning, respectively.

By themselves, the Wealth Management Analysis Report, Estate Report and Insurance Report (collectively referred to herein as the "Reports"), are not investment advisory services. However, if you receive a Wealth Management Analysis Report and an Estate and/or Insurance Report dated within 180 calendar days of each other, those Reports will be considered an investment advisory service from Merrill Lynch, as they may contain more comprehensive investment advice designed to assist you in the areas of wealth management and structuring, and personal insurance and estate planning. The Reports do not make specific investment recommendations or analyze particular securities, but rather may contain one or more asset allocation scenarios based upon your stated investment objective, risk tolerance and other factors, as well as any insurance needs and/or estate expense and wealth transfer analysis.

The Reports do not provide on-going investment advice. The investment advice provided as part of this service is contained in the collective Reports themselves, is current as of the date of each respective Report and is completed upon the delivery of the specific Report. Thereafter, your Financial Advisor - acting in a brokerage and/or insurance agent capacity - is available to discuss the Reports. However, it is your responsibility to determine whether any further action with respect to the implementation of the Reports should be taken, and Merrill Lynch will only act upon your instruction.

ASSETS UNDER MANAGEMENT

As of August 31, 2018, Merrill Lynch had assets under management of \$878.93 billion, of which \$273.57 billion was managed on a discretionary basis and \$605.35 billion was managed on a non-discretionary basis.

FEES AND COMPENSATION

Merrill Lynch does not charge fees for the Reports.

OTHER FEES AND EXPENSES

You are neither required to implement any of the recommendations made in the Reports, nor are you required to transact business with us if you choose to implement any aspects of a Report. Similarly, there is no obligation for you to open a securities account with us, to purchase any insurance products through a Financial Advisor (some of whom are also insurance salespersons) or to use any of the products or services offered by us or our affiliates (such as credit, mortgage, employee benefits or trust services) either before or after receiving the Reports.

If you decide to implement any of the recommendations in the Reports, such implementation will be outside the scope of the services covered by the Reports described in this Brochure. We will not act as investment adviser or broker-dealer with respect to your implementation of the recommendations, unless you and we otherwise agree, in which case such services will be subject to separate agreements between you and us and will again be outside the scope of the services covered by this Brochure. Should you decide to use or purchase our products or services or those of an affiliate, we, our affiliates and employees will receive fees and compensation for such products and services. Such fees and compensation may include commissions, spreads, markups or markdowns, compensation from investment advisory fees and mutual fund advisory and distribution fees.

COMPENSATION FOR THE SALE OF SECURITIES

As noted above, our investment advice to you in relation to the Reports begins and ends with the Reports themselves. It is entirely your decision whether to implement any of the recommendations contained in the Reports. If you choose to implement any of the recommendations we make in the Reports through Merrill Lynch, this will be a separate service outside the scope of the service represented by the Reports, which will require separate agreements between you and us and separate disclosures from us. We and our employees, including your Financial Advisor, will benefit from any fees or other compensation paid to us that result from your use of our other services to implement your recommendations. Clients may also use other products or services available from or through us and in such case pay additional compensation. Financial Advisors offering these services receive compensation from Merrill Lynch. This practice creates a potential conflict of interest that may give us and our Financial Advisors an incentive to recommend products or services based on the compensation received. Fees and commissions may also be higher for some products or services, and the remuneration and profitability to us and our Financial Advisors resulting from transactions on behalf of or management of certain accounts may be greater than the remuneration and profitability resulting from other advisory accounts, products or services. We address these conflicts through disclosure in this Brochure. Moreover, our Financial Advisors are required to recommend programs, services, investment products and securities that are suitable for you based upon your investment objectives, risk tolerance and financial situation and needs. In addition, we have adopted policies and procedures to address the suitability of products, services and programs offered to clients.

CONDUCTING BUSINESS THROUGH MERRILL LYNCH

It is your responsibility to determine if, and how, the suggestions contained in the Reports should be implemented or otherwise followed. You are neither required to implement any of the recommendations made in the Reports, nor are you required to transact business with us if you choose to implement any aspects of a Report.

As noted above, the collective Reports are considered an investment advisory service that is completed upon the delivery of the Reports. Thereafter, if you choose to implement any of the suggestions made in the Reports through your Merrill Lynch securities account(s), we will be acting solely as a broker-dealer, not as an investment adviser (unless otherwise agreed in writing). In executing transactions for your accounts in accordance with your instructions, we, acting as a broker-dealer, may act as agent or as principal for our own account.

We are both a broker-dealer and an investment adviser, and we offer both brokerage and investment advisory services. There are important differences between brokerage and investment advisory services, including the types of advice and assistance provided, the fees charged, and the rights and obligations of the parties. Brokerage services are also regulated under different laws and rules than investment advisory services. Among our many obligations as a broker-dealer, we will execute transactions upon your instruction, deal fairly with you, and make recommendations that are suitable in light of your stated risk tolerance, financial needs and investment objectives. As an investment adviser, we must act solely in your best interest, provide certain specific disclosures and generally act in accordance with the standards of a fiduciary as that term is interpreted under applicable law. Of course, the above is an exceedingly brief summary, and numerous laws and regulations apply to each capacity as well as to the specific products or services being provided. It is important for you to understand these differences, particularly when determining which service or services you might select. You should carefully read all the applicable agreements and disclosures for the services you are considering. For additional information, you should contact your Financial Advisor.

In our capacity as a broker-dealer, we, through our Financial Advisors, may provide you with additional analyses, reports and proposals at various times, including during the course of discussing possible implementation steps. These analyses, reports and proposals are not part of the Wealth Management Analysis Reports. In addition, our employees or an affiliate may review client data, including your responses to the Wealth Management or other questionnaires, to assist you and your Financial Advisor with implementation issues or in connection with offering other Merrill Lynch products or services.

SOURCES OF REVENUE

As a broker-dealer, Merrill Lynch offers a wide variety of securities and brokerage services. Our principal sources of income, which include commissions and other compensation for the sale of investment products, are derived from our business as a broker-dealer.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Neither we nor our Financial Advisors receive performance-based or other fees for the Reports. As described above, the Reports do not make specific investment recommendations or analyze particular securities. The asset allocation recommendations provided in connection with the Reports do not raise the conflicts associated with the side-by-side management of accounts.

TYPES OF CLIENTS

The Reports are designed to assist individual clients. You are not required to open or maintain a securities account with us in order to implement any options contained in the Reports.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

As part of the Reports, we may provide one or more asset allocation scenarios for clients to consider. An asset allocation is a mix of investment classes - equities, fixed income, cash, and, where appropriate, alternative investments - for a client's investment portfolio. The appropriate balance is based on the anticipated return and relative risk of each asset category as well as the client's personal factors such as risk tolerance, investment objective, age, liquidity needs, time horizon, current asset allocation and asset level. We may provide one or more asset allocation scenarios. These asset allocations may recommend allocation ranges of 0% to 100% to four asset classes:

- Equity Securities;
- Fixed Income Securities;
- Alternative Investments, if appropriate (including non-traditional funds);
- Cash

Our more conservative asset allocations typically recommend a greater percentage of your assets be allocated to fixed-income investments and cash, rather than to equity securities. Our more aggressive asset allocations typically recommend a greater percentage of your assets be allocated to equity investments and alternative investments (if appropriate), rather than to fixed-income investments and cash. You are under no obligation to implement any asset allocation recommendation made in the Reports. From time to time, we may adjust the recommended allocation ranges within these categories based on market conditions and other factors.

Principal sources of information that Merrill Lynch uses to prepare a Report may include a client questionnaire, other verbal information you may provide to your Financial Advisor, as well as government reports and publications, tax and financial planning publications, and material prepared by us. You are responsible for providing us with information that is accurate and complete, and any failure to do so is likely to affect the analyses and recommendations contained in the Report. Any change in your financial circumstances would also impact the conclusions and suggestions provided through the Report.

CLIENT RESPONSIBILITIES

It is important for you to understand that it is your responsibility to determine if, and how, the suggestions contained in the Report should be implemented or otherwise followed. You should carefully consider all relevant factors in making these decisions, and you are encouraged to consult any of your outside professional advisers. Any information presented about tax considerations affecting your financial transactions or arrangements is not intended as tax advice and should not be relied upon for the purpose of avoiding any tax penalties. Neither we nor our Financial Advisors provide tax, accounting or legal advice. You should review any planned financial transactions or arrangements that may have tax, accounting, or legal implications with your personal professional advisers.

RISK DISCLOSURE

The Reports do not make specific investment recommendations or analyze particular securities. If you decide to implement any of these proposed asset allocation models through a brokerage or investment advisory account, your account will be subject to investment risk and you may lose money. Brokerage or investment advisory accounts are not bank accounts. They are not insured or otherwise protected by the Federal Deposit Insurance Corporation, are not an obligation of any bank or any affiliate of Merrill Lynch; and are not endorsed or guaranteed by Bank of America, Merrill Lynch, or any bank or any affiliate of Merrill Lynch. You should further understand that all investments involve risk (the amount of which may vary significantly), that performance of any kind can never be predicted or guaranteed and that the value of your portfolios will fluctuate due to market conditions and other factors.

MATERIAL RISKS

Following are the material risks associated with the Reports:

- The Reports typically contain one or more asset allocation scenarios based upon your stated risk tolerance, investment objective, age, liquidity needs, time horizon, current asset allocation and value of the assets. We have changed the allocation models in the past and may change these models in the future depending on research and investment strategy analysis. We have no obligation to revise the Reports or otherwise advise you if an allocation model or any of our assumptions change in the future.
- The analyses and asset allocations contained in the Reports are based on historical financial data, assumptions about future financial trends (including market appreciation or decline, rates of return and risks for various asset classes), assumptions about applicable laws and regulations, and appropriate financial planning strategies.
- The analyses contained in the Reports are based on probabilistic and/or deterministic modeling as appropriate, which do not analyze specific security holdings. Instead, it analyzes the identified asset allocation, cash inflows, and cash outflows. Any analysis represents a static analysis at a specific point in time. As a result, the results of the analysis can change over time and with each use if any of the underlying assumptions and/or profile data are adjusted.
- Any projections, analyses or other information contained in or with the Reports regarding various investment outcomes are hypothetical in nature, do not reflect actual investment results and are not guarantees of future results.
- The Reports do not provide ongoing advice regarding your specific securities investments. Therefore, it is important for you to monitor current events, such as changes in tax laws or in the financial markets, which may affect your plans and circumstances. You should review your investment strategy and decisions from time to time with your Financial Advisor to determine the impact that these events or changes may have on your circumstances.
- We apply certain assumptions to your particular circumstances. The analyses and recommendations provided in or with the Reports can be significantly affected by even small changes in our assumptions or your individual circumstances, in particular by any changes in your financial position or investment objectives. It is strongly recommended that you obtain an updated Report if you choose to implement any recommendations or proposed strategies at a later time.
- Unless otherwise indicated, the return rates and dollar figures contained in the Reports do not include investment expenses (including, but not limited to commissions, transaction fees or investment advisory program fees as applicable); thus, any results shown will be reduced by such costs. Also, where applicable (and only as indicated) assumptions as to federal income tax rates, state income tax rates, and estate taxes reflected in the Report would only be general estimates and subject to change.
- We make no representations or warranties with respect to the present or future level of risk or volatility in a portfolio that is invested in accordance with any asset allocation recommendation or your portfolio's future performance. Should you choose to implement the recommendations, you assume the risks involved with investing in securities and other investment products, and you could lose all or a portion of the amount so invested.
- Our asset allocation recommendation may include an allocation to alternative investments, where appropriate. For investors who may want to consider alternative investments as part of a diversified portfolio, careful consideration should be given to the associated risks of these investments. The investor's investment objectives, time horizon, risk tolerance, liquidity needs and net worth should be appropriate as certain types of products that implement alternative investment strategies (such as hedge funds and private equity) are often long-term, illiquid investments that are not easily valued. Often specific levels of net worth and liquidity are required in making certain alternative investments available (e.g., for some alternative investments, such as hedge funds and private equity, net worth of \$5 million or more is required). In addition, the timing of capital calls and distributions may not be predictable; periodic pricing or valuation information may not be available; and complex tax structures may be utilized and there may be delays in distributing important tax information. Certain alternative investment products (such as hedge funds and private equity) are sold pursuant to exemptions from registration with the SEC and may not be subject to the same regulatory requirements as other investment products. Certain alternative investments require tax reports on Schedule K-1 to be prepared and filed. As a result, investors will likely be required to obtain extensions for filing federal, state, and local income tax returns each year. Certain other investments in your portfolio may also be classified as alternative investments. Non-Traditional funds (NTFs) are mutual funds and exchange traded funds that are classified as alternative investments because their principal investment strategies utilize alternative investment strategies or provide for alternative asset exposure as the means to meet their investment objectives. Though the portfolio holdings of NTFs are generally made up of stocks and bonds, NTFs may also hold other asset classes and may use short selling, leverage and derivatives. While the strategies employed by NTFs are often used by hedge funds and other alternative investment vehicles, unlike hedge funds, NTFs are registered with the SEC and thus subject to a more structured regulatory regime and offer lower initial and subsequent investment minimums, along with daily pricing and liquidity. While these investment vehicles can offer diversification within a relatively liquid and accessible structure, it is absolutely essential to understand that because of this structure, NTFs may not have the same type of non-market returns as other investments classified as alternative investments (such as hedge funds) and thus may serve as an imperfect substitute for such other investment vehicles. The risk characteristics of NTFs can be similar to those generally associated with traditional alternative investment products (such as hedge funds). No assurance can be given that the investment objectives of any particular alternative investment will be achieved. Like any investment, an investor can lose all or a substantial amount of his or her investment. In addition to the foregoing risks, each alternative investment vehicle is subject to its own varying degrees of strategy-specific or other risks. Whether a particular investment meets the investment objectives and risk parameters of any particular client must be determined case by case. You must carefully review the prospectus or offering materials for any particular fund/pooled vehicle and consider your ability to bear these risks before any decision to invest.

DISCIPLINARY INFORMATION

The following is a summary of certain adverse legal and disciplinary events and regulatory settlements that may be material to your decision of whether to retain us for your investment advisory needs. Certain disclosures below relate to disciplinary events that occurred with predecessor firms, Banc of America Investment Services, Inc. ("BAI") and Banc of America Securities LLC ("BAS"), which each merged with MLPF&S in the 2009-2010 time period. You can find additional information regarding these settlements in Part 1 of Merrill Lynch's Form ADV at: adviserinfo.sec.gov/IAPD.

On August 20, 2018, the SEC announced that MLPF&S, without admitting or denying the findings, entered into a settlement related to willful violations of Sections 206(2) and 206(4) of the Advisers Act and Advisers Act Rule 206(4)-7. Specifically, the SEC's administrative order found: (1) a failure to disclose that the portfolio manager process employed in connection with a January 2013 termination recommendation was exposed to a conflict of interest (less than one-seventh (1/7) of 1% of total advisory accounts (approximately 1,500) were invested in the products subject to the termination recommendation); and (2) a failure to adopt and implement written policies and procedures reasonably designed to prevent violations of the Advisers Act. In determining the appropriate sanctions, the SEC considered Merrill Lynch's remedial acts promptly undertaken and cooperation afforded the SEC staff. Merrill Lynch consented to the imposition of a cease-and-desist order, a censure, and disgorgement and a financial penalty totaling approximately \$8.8 million.

On June 16, 2014, MLPF&S, without admitting or denying the findings, entered into a FINRA settlement relating to its failure to have an adequate supervisory system to ensure that certain clients received sales charge waivers for purchases of certain mutual funds' Class A shares, which affected certain retirement accounts and certain clients with a particular type of brokerage account. This settlement resulted from MLPF&S self-identifying certain of these issues. MLPF&S consented to the imposition of a censure and a fine of \$8 million and agreed to provide additional reimbursement to the agreed upon impacted clients. It has reimbursed all such impacted clients.

On June 21, 2012, MLPF&S, without admitting or denying the findings, entered into a FINRA settlement related to the following: (1) failure to have an adequate supervisory system around billing processes for certain investment advisory programs and, as a result, overcharging certain client accounts during the 2003-2011 time period (client accounts impacted were less than 5% of its total advisory accounts and the aggregate fee overcharge amount was less than one-half (1/2) of 1% (approximately \$32 million) of the total advisory fees billed during that period); (2) failure to send contemporaneous or periodic trade confirmations to certain client accounts for ten investment advisory programs; (3) having inaccurate or incomplete trade confirmations for certain mutual fund transactions by failing to state the trade capacity as agent or a principal on trade confirmations and account statements; (4) failure to deliver (directly or through a vendor) proxy materials to certain clients or to their designated investment advisers and failure to have an adequate supervisory system to detect this failure (clients impacted constituted less than 1% of its clients during the relevant period); and (5) failure to send margin risk disclosure statements and/or business continuity plans to certain clients upon the opening of their accounts (clients impacted were less than 1% of its clients during the relevant period). In determining the appropriate sanctions, FINRA considered MLPF&S' internal review through which it identified the violations, the remedial measures that it took to correct its systems and procedures, and its efforts to provide remediation to affected clients. MLPF&S consented to the imposition of a censure and a fine of \$2.8 million. All overcharged accounts were reimbursed.

On October 4, 2011, MLPF&S entered into a consent agreement with FINRA regarding its alleged failure to have a supervisory system to ensure that all accounts in which an employee either had a financial interest or over which the employee had control were monitored and reviewed for potential misconduct. In addition, FINRA found that MLPF&S failed to establish, maintain and enforce written procedures to adequately supervise a registered representative who was subsequently found to have used a business account at the firm to implement a fraudulent scheme. Without admitting or denying the findings, MLPF&S consented to the entry of findings, a censure, and a fine of \$1 million.

On June 6, 2009, BAI and BAS, two of our predecessor firms, were enjoined by the United States District Court for the Southern District of New York from violating, directly or indirectly, Section 15(c) of the Exchange Act. The injunction was the result of an SEC complaint alleging that BAI and BAS had violated Section 15(c) by allegedly misleading customers about the nature and risks associated with auction rate securities ("ARS"). Without admitting or denying the allegations, BAI and BAS entered into a consent decree and agreed to a series of undertakings designed to provide relief to certain individual investors. On January 10, 2012, MLPF&S agreed to settlements with the Illinois Securities Department (for alleged activities of BAS and BAI) and the North Carolina Department of the Secretary of State, Securities Division (for ARS activities of MLPF&S) involving the marketing and sale of ARS. In both actions, it was alleged that the inappropriate marketing and sales of ARS occurred without adequately informing certain customers of the increased risks of illiquidity associated with ARS that constituted an occurrence of dishonest and unethical practices in the offer and sale of securities and failure to supervise. In the Illinois action, MLPF&S agreed, among other things, to repurchase at par certain illiquid ARS and to pay a total fine of \$1,578,321 to the State of Illinois out of a total civil penalty of \$50 million that was to be distributed among the other state regulator parties to an ARS-related consent order. With respect to the North Carolina action, MLPF&S agreed, among other things, to repurchase at par certain illiquid ARS held by certain of its clients and to pay a total fine of \$3,193,552 to the North Carolina regulator representing its portion of a total civil penalty of \$125 million that was to be distributed among the other state regulator parties to an ARS-related consent order.

On March 11, 2009, the SEC issued an order against MLPF&S alleging that, from 2002 to 2004, several of its financial advisors permitted day traders to hear confidential information regarding MLPF&S institutional customers' unexecuted orders as they were transmitted over the internal squawk box system. According to the SEC, MLPF&S lacked written policies or procedures to limit access to the equity squawk box, to track which employees had access to the equity squawk box or to monitor employees' use of the equity squawk box in violation of Section 15(f) of the Exchange Act and Section 204A of the Advisers Act. Without admitting or denying the SEC's findings, MLPF&S consented to the entry of a cease and desist order as to violations of these provisions, a censure and the payment of a \$7 million civil money penalty. It was obligated to comply with certain undertakings regarding the enhancement of certain policies and procedures.

On January 30, 2009, the SEC issued an order against MLPF&S regarding the Merrill Lynch Consulting Services program and the offering of those services through a Florida branch office for a period of several years concluding in 2005. The Order found that material misrepresentations had been made and certain conflicts of interest not disclosed, and that MLPF&S had not maintained adequate records or reasonably supervised certain Florida investment advisory representatives. Without admitting or denying the non-jurisdictional findings, MLPF&S consented to a censure, to cease and desist from violations of Sections 204 and 206(2) of the Advisers Act and its Rule 204-2(a)(14), and a fine of \$1 million. In accepting the settlement, the SEC noted the voluntary and significant remedial acts promptly undertaken by MLPF&S.

On May 1, 2008, BAI and Columbia Management Advisors, LLC, an Affiliate of BAI at the time ("Columbia"), without admitting or denying the findings, consented to an SEC administrative order relating to (1) BAI's alleged failure to disclose to clients that in selecting investments for discretionary mutual fund wrap fee accounts, it favored two mutual funds managed by Columbia and (2) Columbia's allegedly willful acts to aid and abet and cause such acts. BAI and Columbia consented to a censure and to cease and desist from committing or causing violations and future violations of Sections 17(a)(2) and 17(a)(3) of the Securities Act, Sections 206(2), 206(4) and 207 of the Advisers Act and Advisers Act Rule 206(4)-1(a)(5). In addition, BAI was ordered to pay an aggregate amount of \$793,773 to certain entities specified in the Order and a penalty of \$2 million to the SEC. Columbia was ordered to pay an aggregate amount of \$516,382 to certain entities specified in the Order and a fine of \$1 million. BAI also agreed to certain undertakings contained within the Order.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

MLPF&S, an indirect wholly-owned subsidiary of Bank of America, is a leading global investment banking firm and a registered broker-dealer, investment adviser and futures commission merchant. In the United States, MLPF&S acts as a broker (i.e., agent) for corporate, institutional and governmental and private clients and as a dealer (i.e., principal) in the purchase and sale of corporate securities, primarily equity and debt securities traded on exchanges or in the over-the-counter markets. MLPF&S also acts as a broker and/or a dealer in the purchase and sale of mutual funds, money market instruments, government securities, high-yield bonds, municipal securities, financial futures contracts, and options. The futures business and foreign exchange activities are conducted through MLPF&S and other affiliates.

MLPF&S operates the firm's U.S. retail branch system, and also provides financing to clients, including margin lending and other extensions of credit as well as a wide variety of financial services, such as securities clearing, retirement services, and custodial services.

In July 2015, Bank of America announced a decision to separate the retail and institutional broker-dealer activities currently operating through MLPF&S into two distinct legal entities. Retail customers will continue to be serviced through MLPF&S, while institutional clients currently transacting through MLPF&S will move to a new broker-dealer entity, BofAML Securities, Inc., which is also a wholly-owned indirect subsidiary of Bank of America. This separation and migration of institutional broker-dealer activities to BofAML Securities, Inc. is subject to regulatory approvals and is intended to conclude in 2018.

For purposes of Form ADV Part 2, certain MLPF&S management persons are registered as registered representatives or associated persons of MLPF&S. In the future, additional MLPF&S personnel may be considered management persons and, as such, may be registered, or have applications pending to register, as registered representatives and associated persons of Merrill Lynch to the extent necessary or appropriate to perform their job responsibilities.

Bank of America, through its subsidiaries and affiliates, provides broker-dealer, investment banking, financing, wealth management, advisory, asset management, insurance, lending and related products and services on a global basis. These products and services include securities brokerage, trading and underwriting; investment banking, strategic advisory services (including mergers and acquisitions) and other corporate finance activities; wealth management products and services including financial, retirement and generational planning; asset management and investment advisory and related record-keeping services; origination, brokerage, dealer and related activities in swaps, options, forwards, exchange-traded futures, other derivatives, commodities and foreign exchange products; securities clearance, settlement financing services and prime brokerage; private equity and other principal investing activities; proprietary trading of securities, derivatives and loans; banking, trust and lending services, including deposit-taking, consumer and commercial lending, including mortgage loans, and related services; insurance and annuities sales and research across the following disciplines: global equity strategy and economics, global fixed-income and equity-linked research, global fundamental equity research, and global wealth management strategy. Bank of America is subject to the reporting requirements of the Exchange Act and additional information about Bank of America can be found in publicly available filings with the SEC.

Our affiliated insurance agency, Merrill Lynch Life Agency Inc. ("MLLA") offers and sells insurance products, and certain of our Financial Advisors are also insurance salespeople. If you decide to purchase insurance products from or through MLLA, we, including your Financial Advisor, will receive fees and compensation for such products.

We, through our Financial Advisors, may suggest or recommend that clients, including clients receiving the Reports, use our securities account, execution and custody or other services, or such services of an affiliate. Similarly, Financial Advisors, who also handle clients' securities accounts, may suggest or recommend that clients purchase our products or products of an affiliate. Where Merrill Lynch's or our affiliate's services are used or products are purchased by clients, we and our affiliates will receive fees and compensation. Financial Advisors may, as permitted by applicable law, receive compensation (the amount of which may vary) in connection with these products and services.

We address these conflicts through disclosure in this Brochure. Moreover, our Financial Advisors are required to recommend programs, investment products and securities that are suitable for each client based upon the client's investment objectives, risk tolerance and financial situation and needs. In addition, we have established a variety of restrictions, procedures and disclosures designed to address potential conflicts of interest – both those arising between and among client accounts as well as between client accounts and our business.

We do not recommend or select other investment advisers in connection with the Reports. However, we do recommend or select other investment advisers in connection with other investment advisory programs that we maintain. You will receive a separate brochure describing these services in more detail if you were to enroll in one of these investment advisory programs.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

CONFLICTS OF INTEREST AND INFORMATION WALLS

Merrill Lynch is an indirect wholly-owned subsidiary of Bank of America. Bank of America engages in a wide range of activities and businesses across a broad spectrum of clients. As a result, we recognize actual, potential and perceived conflicts of interest may develop in the normal course of operations in various parts of the Bank of America organization. To address these potential conflicts, information walls are in place to allow multiple businesses to engage with the same or related clients at the same time while mitigating the conflicts which may arise from such a situation. For example, information walls are designed to prevent the unauthorized disclosure of material nonpublic information and allow public side sales, trading and research activities to continue while other businesses within Bank of America possess material nonpublic information.

Additionally, Bank of America maintains a Code of Ethics which provides guidelines for the business practices and personal conduct all associates and board members are expected to adopt and uphold. Managing conflicts of interest is an integral part of Bank of America's risk management process. We believe that no organization can totally eliminate conflicts that exist explicitly or implicitly. Bank of America, including Merrill Lynch's investment advisory business, evaluates its business activities and the actual and possible conflicts that may emerge from its activities on an ongoing basis. To the extent that existing or new business activities raise an actual conflict of interest, or even the appearance of a conflict, we endeavor to provide you with full and clear disclosure or to take action to avoid them.

CODE OF ETHICS

We have adopted an Investment Adviser Code of Ethics (the "Code of Ethics") covering our personnel who are involved in the operation and offering of investment advisory services. The Code of Ethics is based on the principle that clients' interests come first, and is intended to assist employees in meeting the high standards that we follow in conducting our business with integrity and professionalism. The Code of Ethics covers such topics as the:

- Requirement that all employees comply with all applicable securities and related laws and regulations;
- Reporting and/or clearance of employee personal trading;
- Prevention of misuse of material non-public information; and
- Obligation to report possible violations of the Code of Ethics to management or other appropriate personnel.

All covered personnel must certify receipt of the Code of Ethics. We will provide a copy of the Code of Ethics to you upon request.

We also have imposed policy restrictions on all personnel regarding transactions for their own accounts and accounts over which they have control or a beneficial interest. In addition, we have special policies requiring that certain personnel obtain specific approval of their securities transactions and have implemented procedures for monitoring these transactions as well as those of all our employees.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

As described above, the Reports are considered an investment advisory service that is completed upon the delivery of the Reports. You are neither required to implement any of the recommendations made in the Reports, nor are you required to transact business with us if you choose to implement any aspects of a Report. If you choose to implement any or all of the recommendations made in the Reports through us, we will be acting solely as a broker-dealer, not as an investment adviser (unless otherwise agreed in writing). If you choose to enroll in another Merrill Lynch investment advisory program, you will receive a separate brochure for that program describing Merrill Lynch's participation or interest in client transactions.

INVESTMENTS IN SECURITIES BY MERRILL LYNCH AND OUR PERSONNEL

We and our affiliates act in a variety of capacities to a wide range of clients. From time to time in the course of those duties, confidential information may be acquired that cannot be divulged or acted upon for advisory or other clients. Similarly, we may give advice or take action with regard to certain clients, including clients who receive the Reports, which may differ from that given or taken with regard to other clients. This includes the advice given or actions taken with respect to certain securities or investment managers. In some instances, the actions taken by affiliates with respect to similar services and programs may conflict with the actions taken by us. This is due to, among other things, the differing nature of the affiliate's investment advisory service and differing processes and criteria upon which determinations are made.

We may share our analyses of securities with Financial Advisors and others within Merrill Lynch or our affiliates. In certain cases, this may precede the implementation of investment management decisions in investment advisory accounts. Financial Advisors may consider such analyses in connection with services provided to brokerage and other customers who are not clients participating in any investment advisory program.

MLPF&S or one of its affiliates may have a position in or enter into "proprietary" transactions in securities purchased or sold for clients. MLPF&S or its affiliates may benefit from such securities positions or transactions.

Many of the conflicts related to participation or interest in client transactions and personal trading are less pronounced in the context of financial planning products, such as the Reports, because the Reports do not make specific investment recommendations or analyze particular securities. Rather, the Reports typically contain a proposed asset allocation model based upon your stated risk tolerance, age, current asset allocation and value of the assets. We nevertheless attempt to address conflicts of interest through disclosure in this Brochure and other disclosure documents for clients to consider when deciding whether and how to implement our recommendations. Merrill Lynch Financial Advisors are required to recommend programs, investment products and securities that are suitable for you based upon your investment objectives, risk tolerance and financial situation and needs. In addition, we have established a variety of restrictions, procedures and disclosures designed to address potential conflicts of interest – both those arising between and among client accounts as well as between client accounts and our business. For example, our personnel also are subject to personal trading restrictions as detailed in our policies and procedures and Code of Ethics. These policies and procedures and the Code of Ethics require our Financial Advisors to pre-approve certain securities transactions, disclose his or her investment accounts, and provide or cause Merrill Lynch to receive annual holdings reports and quarterly transaction reports.

BROKERAGE PRACTICES

As described above, you are neither required to implement any of the recommendations made in the Reports, nor are you required to transact business with us if you choose to implement any aspects of a Report. If you choose to implement any or all of the recommendations made in the Report through us, we will be acting solely as a broker-dealer, not as an investment adviser (unless otherwise agreed in writing).

REVIEW OF ACCOUNTS

If delivered within the 180 day period as described above, the Reports are considered an investment advisory service that is completed upon the delivery of the specific Reports, and as such, we do not provide ongoing advice with respect to this service. As indicated previously, you are not required to open a securities account(s) or otherwise transact with us. Accordingly, there are no account reviews associated with the service as described in this Brochure. We do not provide clients with the Reports on a regular or periodic basis. Accounts for clients who participate in other Merrill Lynch investment advisory programs may be subject to reviews as described in the brochures applicable to those programs.

CLIENT REFERRALS AND OTHER COMPENSATION

As part of broader Firm arrangements, we have entered into solicitation arrangements with certain third party entities to refer prospective investment advisory clients to us ("Solicitors"). Generally, the fees paid to Solicitors will be paid from the fee earned by us for providing investment advisory services. This fee will generally be a percentage of the fee ordinarily credited to the client's Financial Advisor. We will pay this fee to the Solicitor for each investment advisory account referred to us by the Solicitor. If we terminate the agreement with the Solicitor for certain reasons, we may continue to pay the Solicitor for a period of time after termination. We will not increase the advisory fees payable by you as a result of our payments to the Solicitor. The fees we charge will not be higher than our usual fees because of the payments to the Solicitor. As noted above, we charge no fees for the Reports.

Employees of Merrill Lynch may refer advisory clients to BANA, including its private bank, U.S. Trust, Bank of America Private Wealth Management, and its affiliates for products and services. Similarly, employees of BANA and other affiliates may refer clients to Merrill Lynch for brokerage or advisory services. These referrals may involve the payment of referral fees between Merrill Lynch and BANA or its affiliates.

CUSTODY

Custody services are not provided as a part of this service. As discussed above, you are not required to transact business with us if you choose to implement any aspects of a Report. Similarly, there is no obligation for you to open a securities account with us. However, if you choose to open a securities account with us, custody services may be provided as part of that service.

INVESTMENT DISCRETION

The Reports do not involve the exercise of investment discretion. If a client who receives the Reports is enrolled in certain Merrill Lynch investment advisory programs, we may accept discretionary authority to the extent described in the brochures for those programs and our written investment advisory agreement with the client.

VOTING CLIENT SECURITIES

We do not make specific investment recommendations or analyze particular securities in the Reports. Accordingly, this service does not involve the voting of client securities.

FINANCIAL INFORMATION

Not applicable.

GLOSSARY

"Advisers Act" means the Investment Advisers Act of 1940, as amended.

"AWC" means a FINRA letter of acceptance, waiver and consent.

"BAI" means Banc of America Investment Services, Inc.

"BANA" means Bank of America, N.A.

"Bank of America" means Bank of America Corporation.

"BAS" means Banc of America Securities LLC.

"Brochure" means the Merrill Lynch brochure relating to Merrill Lynch Wealth Management and Estate and Insurance Analysis Reports, as specifically described herein, as amended or updated from time to time. The Brochure is also referred to as the Disclosure Statement.

"Client" or "You" means the client who receives the Reports.

"Columbia Management" means Columbia Management Advisors, LLC.

"Code of Ethics" means Merrill Lynch's Investment Adviser Code of Ethics. "Consent" means a letter of acceptance, waiver and consent.

"Disclosure Statement" means the Merrill Lynch brochure relating to Merrill Lynch Wealth Management and Estate and Insurance Analysis Reports, as specifically described herein, as amended or updated from time to time. The Disclosure Statement is also referred to as the Brochure.

"Exchange Act" means the Securities Exchange Act of 1934, as amended.

"Financial Advisor" means your Merrill Lynch Financial Advisor or, for certain clients, a representative of the Merrill Edge Advisory Center.

"FINRA" means the Financial Industry Regulatory Authority, Inc.

"Investment Company Act" means the Investment Company Act of 1940, as amended.

"Merrill Lynch," "MLPF&S," "we" or "us" means Merrill Lynch, Pierce, Fenner & Smith Incorporated.

"Order" means an order issued by the SEC.

"Report" or "Reports" means the Merrill Lynch Wealth Management Estate and Insurance Analysis Report.

"SEC" means the U.S. Securities and Exchange Commission.

"Securities Act" means the Securities Act of 1933, as amended.

"Solicitors" means third party entities that Merrill Lynch has entered into solicitation agreements with to refer prospective investment advisory clients to Merrill Lynch.