



# *Ameriprise*<sup>®</sup> Premier Retirement Income

Client Disclosure Brochure

(Form ADV Part 2A)

March 2023

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Minneapolis, MN 55474  
[ameriprise.com](http://ameriprise.com)

This Brochure provides information about the qualifications and business practices of Ameriprise Financial Services, LLC and the *Ameriprise* Premier Retirement Income service. If you have any questions about the contents of this Brochure, please consult with your financial advisor or contact us at 800.862.7919 between 7 a.m. and 6 p.m. Central time. 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.

Additional information about Ameriprise Financial Services, LLC also is available on the SEC's website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov).

# Material Changes

## *Annual Update*

This Brochure dated March 2023 is filed as the annual update to Form ADV Part 2A. No material changes have occurred since the Brochure was first filed in December 2022.

Ameriprise Financial Services will notify you when there are material changes to this Brochure and offer you the opportunity to request a copy of the revised Brochure. You should carefully review any material changes and consider requesting a revised Brochure as that revised Brochure will replace any previous version you have received.

You may request copies of the Brochure from your financial advisor or by writing to Ameriprise Financial Services, LLC at 2661 Ameriprise Financial Center, Minneapolis, MN 55474, or by calling 800.862.7919.

**Please retain a copy of this Brochure for your records.**

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# Advisory Business

Ameriprise Financial Services, LLC (“Ameriprise Financial Services”) is an investment advisory firm offering financial planning services since 1986. Ameriprise Financial, Inc. (NYSE: AMP), a publicly held company, is the parent company of Ameriprise Financial Services.

References in this Brochure to “you” and “your” apply to each client who signs the *Ameriprise Premier Retirement Income Agreement* (“Service Agreement”). References to “us,” “we,” and “our” refer to Ameriprise Financial Services, LLC. References to “your financial advisor” are to your Ameriprise financial advisor.<sup>1</sup> The services described in this Client Disclosure Brochure apply to our *Ameriprise Premier Retirement Income* clients only.

## *Ameriprise Premier Retirement Income*

### Overview and Appropriateness of the Service for you

*Ameriprise Premier Retirement Income* service (the “Service”) is a specialized approach to retirement income planning that builds on our current investment advisory services and products and provides advice to clients approaching or in the distribution phase of retirement. The Service and your financial advisor tailor advisory services to your individual needs as discussed in the next several sections.

The Service is provided by our Ameriprise retirement income consulting team (the “Service team”) in conjunction with your Ameriprise financial advisor. The Service team will review and analyze your data and other information to make recommendations that can help you meet your retirement income goals. You and your financial advisor will work together to act on those recommendations, as appropriate. The Service provides you with an initial, and at least annually thereafter, retirement income plan that seeks to identify and maximize dependable income sources while managing investment and shortfall risk relating to your accounts, assets, and income sources you have designated to be included for analysis in the Service (“Retirement Portfolio”). In addition, we’ll seek to provide you with tax-smart withdrawal strategies that will help you reach your retirement goals.

The Service allows you to receive ongoing retirement income planning advice for an annual flat fee. The Service is limited to your Retirement Portfolio and is appropriate for clients who desire retirement income advice and seek product or security specific advice tailored to accounts held at Ameriprise Financial Services.

In determining whether the Service is appropriate for you at the time of entering into an Agreement and throughout each Engagement Period (“Engagement Period”) with Ameriprise Financial Services, please consider the following:

- The Service is appropriate for individuals, married couples and domestic partners who are generally within five years of beginning their retirement or are already retired;
- The Service is intended for clients that have at least \$1,000,000 in net investable assets held at Ameriprise Financial Services and included in your Retirement Portfolio;
- The Service is appropriate for clients that desire ongoing advice to help optimize income in retirement and are willing to pay a fee for that advice;
- The Service is appropriate for clients that primarily choose to implement the recommendations provided in each written retirement income plan (“Recommendation Report”);
- The Service is not appropriate for clients that primarily choose to implement investment, asset allocation and withdrawals that are not included in the Recommendation Report. In this case, you are doing so without a recommendation from us, and you are assuming the risk that your investment decision does not align with your stated financial goals and/or is not in your best interest;

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<sup>1</sup> If you are a client of the Ameriprise Advisor Center, you may receive advice and support in for the Service from a dedicated team of financial advisors and professionals whose members may use titles such as Client Support Associate, Client Relationship Manager, or Financial Consultant.

- The Service is limited to retirement income planning and does not include or replace your Ameriprise® Financial Planning Service (“AFPS”) which is designed as a long-term, collaborative, ongoing financial planning relationship to help you achieve at least one financial goal or need, however if your only financial goal is related to retirement, AFPS may no longer be appropriate for you once you enroll in the Service;
- The Service does not provide specific buy, sell or hold recommendations concerning individual securities in your investment accounts not held at Ameriprise Financial Services and your financial advisor cannot assist you with implementing or initiating any transactions within such outside accounts;
- Before enrolling in the Service or investing in any investment product, it is your responsibility to understand and consider all fees, expenses and other charges. That includes how much you will pay for the Service and when and how your advisory fee for the service (“Service Fee”) will be calculated and deducted;
- Your Service Fee does not include Managed Account advisory fees, or any transaction-based markups, commissions, sales charges or other ongoing fees charged to you when you implement your Recommendation Report in whole or in part through Ameriprise Financial Services or its affiliates. Additional fee information for any Managed Account or Ameriprise brokerage account you open or maintain with us can be found in the Ameriprise Managed Accounts Client Disclosure Brochure and applicable Managed Account client agreement(s), the Ameriprise Brokerage Client Agreement, the Other Important Disclosures Document, Working in Your Best Interest – Regulation Best Interest Disclosure, and any other related disclosures and documents, all of which are available from your financial advisor. Please review all applicable information carefully before you make an investment decision and contact your financial advisor if you have any questions about the types of fees and expenses that may be associated with your Managed Account or Ameriprise brokerage account. Specific information concerning the fees and other charges of each investment product in which your account invests is available in the product’s prospectus or other offering document; and
- The same or similar services provided to you through the Service may be available to you at a lower fee from another service provider or may provide specific buy, sell or hold recommendations to you concerning accounts not held at Ameriprise Financial Services. Depending on how long you choose to be a client of the Service, and the number and types of products that you purchase from Ameriprise Financial Services in order to act on your Recommendation Report, you may pay more or less to purchase products and services through Ameriprise Financial Services and its affiliates than if you were to purchase products and services from other financial services providers.

The Service and any advice you receive from your financial advisor is tailored to your specific circumstances and intended for your use only. If you choose to share your analysis and recommendations with a different broker-dealer or intermediary, neither your financial advisor nor Ameriprise Financial Services (nor any of its affiliates) is responsible for the outcome.

Ameriprise Financial Services and our financial advisors owe you a fiduciary duty, as applied under the Investment Advisers Act of 1940, as amended, when you enter a Service relationship with Ameriprise Financial Services. This duty means that Ameriprise Financial Services and your financial advisor make investment recommendations that are in your best interest and place your interest ahead of our own and those of your financial advisor. This is accomplished by:

- Explaining and providing to you written disclosures that outline key, relevant factors about the investment advice and recommendations you receive; and
- Providing you with written disclosures that describe material conflicts of interest that your financial advisor and/or Ameriprise Financial Services have as part of the Service. (You will find these written disclosures throughout this Brochure, and in the **“Other Financial Industry Activities and Affiliations”** and **“How we get paid”** sections.)

Your financial advisor can provide you with guidance to help you take action on your Recommendation Report, including asset allocation services that include individual retirement accounts (IRAs) and employer sponsored retirement accounts. Your financial advisor may discuss, present or offer ideas for you to consider related to the Service and these accounts. Such communications are offered solely as education, marketing and examples of the potential uses for purposes of discussion and for your independent consideration, and should not be viewed, construed or relied upon, as investment or fiduciary recommendations or advice under the Employee Retirement Income Security Act of 1974 (“ERISA”) or Section 4975 of the Internal Revenue Code of 1986, as amended (the “Internal Revenue Code”). Such communications should not be (and are not intended to be) relied upon as a primary basis for your investment decisions with respect to your retirement assets.

To the extent that you receive recommendations related to assets held in your brokerage account or with respect to commission-based securities, such recommendations are made as part of your brokerage relationship and are made in your best interest but are not fiduciary recommendations under the Advisers Act, ERISA or the Internal Revenue Code.

Also, to the extent an asset allocation service identifies any specific investment alternative in a retirement plan, please note that other investment alternatives with similar risk and return characteristics may be available to you. Such investment alternatives may be more or less costly than those available at or recommended by Ameriprise Financial Services. Your Plan sponsor (for government plans or those that fall under ERISA) or your financial advisor can assist you in obtaining information about other potential investment alternatives.

## Establishing a relationship and preparing for your analysis

Prior to establishing a Service relationship, you will provide your financial advisor with initial information regarding your Retirement Portfolio and income needs in retirement, and you will receive and review a proposal that outlines how components of the Service could benefit you. Your Service relationship begins on the date that your Service Agreement is accepted (“Effective Date”). Your data gathering and analysis phase begins on the day your advisor confirms they have delivered your Recommendation Report to you and ends the day prior to the anniversary date of the delivery of your initial Recommendation Report. Each twelve-month period thereafter will be a new engagement period.

Shortly after your Effective Date, you will receive an enrollment confirmation. After you have entered into a Service Agreement and are enrolled in the Service, you and your financial advisor will work together to refine your retirement goals as needed and to confirm your Retirement Portfolio to include in the Service. Your financial advisor will help you identify assets, accounts and sources of income to include in your Retirement Portfolio and gather your important documents relevant to your Retirement Portfolio such as your bank and brokerage statements, tax returns, individual retirement account (“IRA”) and retirement plan account statements and statements for any external accounts that will be used to fund your retirement. You will also work with your financial advisor to review investment products that may offer guaranteed or stable income and determine if it is appropriate for you to plan to utilize one or more of these products to help you cover your essential expenses such as housing, food, utilities, taxes and healthcare during your retirement.

Once all of your pertinent information has been received by the Service team from your financial advisor and you have satisfied other applicable eligibility criteria as outlined in the **“Types of Clients”** section, such as completing the transfer of assets into any new accounts you have chosen to open with us, we will begin our analysis.

Provided you submit all of the information necessary to begin our analysis and you have satisfied applicable eligibility requirements, your Recommendation Report will be delivered promptly but no later than 180 days after your Effective Date. If we do not receive all of the information needed and satisfy your eligibility requirements in time to complete the analysis and allow the advisor to deliver the Recommendation Report within this 180 day period, we will send you written termination of the Service relationship. If you subsequently provide any missing information or meet applicable eligibility requirements, you may resubmit an application to re-enroll in the Service.

## Receiving and reviewing your Recommendation Report

Each Recommendation Report will address the key retirement income planning strategies described in the **“Methods of Analysis, Investment Strategies and Risk of Loss”** section of this Brochure. The Service team will prepare recommendations and your financial advisor will deliver a periodic Recommendation Report that will act as your blueprint to help you achieve your retirement income planning goals. The Recommendation Report will address your financial situation in relation to your Retirement Portfolio as well as the priority retirement goal(s) you have discussed with your financial advisor. You and your financial advisor will review the Recommendation Report, and align on the steps to implement this advice.

Your financial advisor will review your financial situation relating to your Retirement Portfolio in the first year of your retirement income planning relationship and thereafter as needed, for example, if your personal financial circumstances or retirement income planning goals change.

## Changing your retirement income plans or financial situation

If your personal financial circumstances or retirement income needs change, you should discuss with your financial advisor if an updated Recommendation Report is needed prior to the annual review. If your need for retirement income planning services changes, discuss with your financial advisor whether the Service is still appropriate for you.

You may change your retirement income planning goals at any time by discussing any desired changes with your financial advisor. Material changes to your retirement income goals or situation, such as an unexpected change in employment status, material changes to income sources, large unexpected expenses, etc., will be incorporated into your upcoming scheduled Recommendation Report unless you or your financial advisor request that a new Recommendation Report be issued prior to the upcoming scheduled Recommendation Report. In this case, your Engagement Period will restart for the upcoming year, including a recalculation of the Service Fee as described in the **“Fees and Compensation”** section.

## Implementation of your recommendations

Each Recommendation Report is provided point in time and any specific and actionable investment or planning recommendations contained in your Recommendation Report are limited to the Retirement Portfolio you have designated to be included in the Service for the applicable Engagement Period. The Service does not include ongoing monitoring of your investments, accounts, or income streams.

The Service is a non-discretionary investment advisory service. This means the Service does not include the implementation of any recommendations provided by the Service team and presented to you by your financial advisor. After you have reviewed your Recommendation Report, you may decide to implement the recommendations you receive in your Recommendation Report with Ameriprise Financial Services, its affiliates or unaffiliated financial services providers. Before implementing any recommendations, carefully consider the ramifications of purchasing products or services. You may want to seek further advice from your lawyer and/or accountant, particularly for estate planning, taxes, or business financial planning issues.

When you choose to purchase products and services through Ameriprise Financial Services, you have the option of investing through a commission-based brokerage account, or a fee-based Managed Account, or both. You will work separately and directly with your financial advisor to implement recommendations within the Managed Accounts, Ameriprise brokerage accounts, or other products and services made available through Ameriprise Financial Service or our affiliates, as appropriate.

The Service does not provide security specific recommendations and neither Ameriprise Financial Services nor your financial advisor may initiate transactions in your investment accounts held outside of Ameriprise. Implementation of recommendations relating to such outside accounts or to income streams such as social security benefits must be done by you and is your responsibility.

Although not part of the Service, where requested, your financial advisor may provide guidance on your retirement plan assets that are held outside of Ameriprise Financial Services in a participant-directed defined contribution plan (e.g., 401(k) plan) (“Outside Workplace Retirement Plan”). Any guidance provided to you is based on information provided by you about your Outside Workplace Retirement Plan and is limited to investments offered through the core lineup of funds established by your retirement plan sponsor. Your Outside Workplace Retirement Plan may include investment options not available at Ameriprise Financial Services or for which your financial advisor may not have access to detailed information. Neither Ameriprise Financial Services nor your financial advisor is responsible for the selection of the available investment options in your Outside Workplace Retirement Plan. Your financial advisor may not make buy recommendations related to employer stock that may be available within your Outside Workplace Retirement Plan. Your financial advisor cannot make any recommendations with respect to any current portfolio holdings or investment options available through a self-directed brokerage account associated with your Outside Workplace Retirement Plan. You are responsible for placing any transactions recommended by your financial advisor. If you desire ongoing guidance on your Outside Workplace Retirement Plan it is important that you provide your financial advisor with updated information, including statements and a list of funds available in your Outside Workplace Retirement Plan, on a regular basis. Your investment objectives and risk tolerance for your Outside Workplace Retirement Plan may differ from those of your other Ameriprise accounts, if any. However, any guidance provided for your Outside Workplace Retirement Plan is provided in consideration of the investment objectives and risk tolerance of any Ameriprise accounts you hold.

## Ongoing Service relationship

You will receive a written Recommendation Report and pay a Service Fee during each Engagement Period. Your Service relationship will continue until you terminate it as described in the **“Termination of Service”** section.

During each Engagement Period, you and your financial advisor should work together to:

- Confirm that the Service continues to remain appropriate for your retirement income planning goals and financial situation;
- Discuss progress over time toward your identified retirement income planning goals; and
- Identify key changes to your situation or Retirement Portfolio that might impact your retirement income goals or our analysis.

## How to make the most of your Service relationship

At Ameriprise Financial Services, we believe that the Service will help provide a pathway to helping you achieve your retirement income planning goals. The retirement income planning relationship begins with you. As a client of the Service, you will need to:

**Establish clear and measurable retirement income planning goals.** Talk with your financial advisor about your goals so they may be a part of the retirement income planning process. For example, if your goal is a “comfortable” retirement, think about what that means to you. The more specific you are about the lifestyle you envision, the better equipped the Service team will be to make recommendations to help you get there and the better informed your financial advisor will be to help you implement those recommendations.

**Provide complete and timely information to your financial advisor.** The Service team will base your retirement income planning analysis and written recommendations on the information that you provide to your financial advisor. You must provide the requested information in a timely manner to receive your Recommendation Report. When you become a client of the Service, you represent that all financial and other data that you and/or your representatives or agents furnish to your financial advisor relating to your Retirement Portfolio are true and correct and may be relied upon by your financial advisor and Ameriprise Financial Services for the purposes of providing you the Service.

The Service team will be better able to make recommendations to help you achieve your retirement income goals if you provide complete and thoughtful information to your financial advisor about your current financial and economic situation, the retirement income goals on which you want advice, your investment objectives, and any investment restrictions you may have. Consider signing up for Total View on the secure site on Ameriprise.com if you have not already done so or providing hard copies for updating annual copies of account statements. Promptly inform your financial advisor if you experience significant life events, or material changes in your financial situation, risk tolerance or financial objectives.

**Review the written recommendations you receive.** Based on the information you provided, the Service team will perform a retirement income planning analysis and give you written recommendations on the retirement income planning goals you have identified. If the Service team’s assumptions, methods, conclusions or recommendations do not meet your expectations, contact your financial advisor right away to resolve your concerns.

**Form reasonable expectations.** Understand the benefits of and limits to the retirement income planning process and be reasonable in your expectations of the results you can achieve with your retirement income plan and investments, given your risk tolerance and objectives. Retirement income planning is an ongoing process; it will not change your situation overnight. Furthermore, events beyond your financial advisor’s control, such as changes in economic conditions, will affect your retirement income planning results. Share with your financial advisor your expectations about the retirement income planning process and what you want to achieve. If your expectations are not met, let your financial advisor know so that he or she can make adjustments to meet your needs.

**Take an active role in the process and the results.** Understand the process, your role and your financial advisor’s role. Provide information and ask questions about the recommendations you receive in the Recommendation Report. If at any time there are additional retirement goals you would like to cover or accounts, assets or income streams you would like to add to your Retirement Portfolio, let your financial advisor know. After reviewing your Recommendation Report with your financial advisor, the next step is to act on the retirement income planning advice you have received.



Take an active role in making decisions about your financial future, and you will position yourself to get the most out of your retirement income planning relationship.

Ameriprise Financial Services is dedicated to providing quality client service. We work hard to ensure your satisfaction with the service that you receive and seek to meet or exceed your expectations. We will work with you to address any of your concerns, including helping you work with a different financial advisor if you so choose. If you would like to work with a different financial advisor, please call us at 800.862.7919 and we will help you find another financial advisor. If for some reason your financial advisor is unable to fulfill the terms of the Service Agreement, another Ameriprise financial advisor may be assigned to you to present the Recommendation Report and help you act on it.

## Fees and Compensation

The advisory fee for the Service (the “Service Fee”) is assessed based on the total of your Managed Account assets that are included in your Retirement Portfolio for a given Recommendation Report. The list of Managed Accounts you designated to be included in your Retirement Portfolio is included in each Recommendation Report. Ameriprise Financial Services calculates a flat fee of 0.20% of such assets on each Calculation Date, as defined below.

The Service Fee for each Engagement Period will be based on the most recent Recommendation Report provided to you. The Service Fee is calculated (i) initially on the last business day of the month when we receive confirmation that your first Recommendation Report was delivered; and (ii) for each Recommendation Report delivered thereafter, the Service Fee will similarly be recalculated on the last business day of the month in which the advisor confirmations delivery (each, a “Calculation Date”). For a Recommendation Report that is provided earlier than the typical twelve-month Engagement Period due to a change in your financial situation or retirement income planning goals, each of the Calculation Date and the Engagement Period are reset and any remaining Service Fee related to the prior Engagement Period will not be charged to you.

This Service Fee will generally be deducted on the first business day of the month (each, a “Posting Date”) from the fee paying account (“Fee Paying Account”) in twelve proportionate monthly payments over the term of the Engagement Period. The Fee Paying Account you designate must be a nonqualified account. The Calculation Date process and monthly Posting Date will continue until the Service is terminated as described in the **“Termination of the Service”** section. Ask questions about the Service Fee so that you understand how it is calculated and what you can expect for this Service Fee.

You are required to maintain sufficient cash balances in your Fee Paying Account to meet the applicable monthly payment, including any amounts in arrears. If on any Posting Date there is not sufficient cash in your Fee Paying Account to cover the portion of the Service Fee amount for that period, Ameriprise Financial Services reserves the right to, or may instruct the custodian to, sell securities held in your Fee Paying Account to cover the fee. If on any Posting Date the Fee Paying Account is not in good order, we will hold the payment for that month and repost on the next scheduled Posting Date or when you designate a new Fee Paying Account, whichever occurs earlier. If Ameriprise Financial Services is unable to deduct the monthly payment over six consecutive Posting Dates, we reserve the right to terminate the Service.

A state may impose a sales tax on your Service Fee, which we will collect and remit to the applicable state.

Since the value of the associated Managed Accounts included in your Retirement Portfolio for a given Recommendation Report will vary, the Service Fee that you pay will vary for each Engagement Period.

The Service Fee compensates Ameriprise Financial Services and is not shared with your financial advisor.

Our affiliate American Enterprise Investment Services Inc. (“AEIS”) receives revenue from several different sources on the products and services you purchase through Ameriprise Financial Services. These sources include arrangements we have in place with product companies, and investment and interest income. See the **“Cost Reimbursement Services and Third Party Payments”** subsection of the **“How we get paid”** section later in this Disclosure Brochure for more information on conflicts of interest regarding revenue sources for Ameriprise Financial Services and its affiliates, as well as the subsection **“Revenue sources for RiverSource Life Insurance Company and, in New York only, RiverSource Life Insurance Co. of New York (collectively, “RiverSource Life”)**” for more information about the fees and commissions you pay when you implement your Recommendation Report through Ameriprise Financial Services and its affiliates.

Your Recommendation Report and your financial advisor may recommend mutual funds offered by mutual fund firms that make Third Party Payments to our affiliate, AEIS, as described in the **“Payments from product companies”** subsection later in this Disclosure Brochure. Within its investment advisory business, compensation for the sale of investment products recommended by financial advisors is not Ameriprise Financial Services’ primary source of revenue from its advisory clients. To the extent that Ameriprise Financial Services receives 12b-1 fees for share classes held in any Managed Accounts, they will be rebated to clients.

Your APRI Service Fee does not include Managed Account fees, markups or brokerage commissions by Ameriprise Financial Services or your financial advisor. If you implement your Recommendation Report in whole or in part through Ameriprise Financial Services or its affiliates, Managed Account Fees, product fees, markups or markdowns and brokerage commissions will apply as applicable. Both time of sale and ongoing fees, if applicable, will apply for products and services purchased in a transaction-based brokerage account.

Information to help you evaluate the benefits, risks, and costs of the investments and services we offer as part of a brokerage relationship, as well as information about material conflicts of interest associated with recommendations we or our financial advisors make to our retail brokerage clients may be found at <https://www.ameriprise.com/bestinterest>. More detail about the differences between Managed Accounts and Ameriprise brokerage accounts may be viewed online by visiting <https://www.ameriprise.com/disclosures> and expanding the sub-heading “Managed Account Client Disclosure Brochures” and then clicking on “Evaluating differences between brokerage and managed accounts”.

## Client programs and promotions

Ameriprise Financial Services may, from time to time, offer reduced or waived fees for the Service to individuals in a particular market segment or geographic area. Your financial advisor can tell you whether there is a promotion available to you. Ameriprise Financial Services, in its sole discretion, determines when to offer, modify and/or discontinue these promotions and programs. These promotions and programs are not available to financial advisors from the Ameriprise Advisor Center.

## Termination of the Service

The Service will remain in effect until one of the following occurs: termination by you; termination of an existing Service Agreement by replacing it with a new one; termination by Ameriprise Financial Services, in its sole discretion; or termination by you through nonpayment of the Service Fee. Termination is effective immediately and your Service Fee will discontinue as of the termination date.

If you terminate at any time after Ameriprise Financial Services has provided you the Recommendation Report for the applicable Engagement Period, or if you terminate the Service and have not provided your financial advisor with complete and accurate information concerning your financial situation, Ameriprise Financial Services reserves the right in its sole discretion to limit the amount of the refund you receive, if any.

To terminate or cancel the Service Agreement, you may contact your financial advisor or call Ameriprise Financial Services directly at 800.862.7919 between the hours of 7 a.m. and 6 p.m. Central time, Monday through Friday.

## Performance-Based Fees and Side-by-Side Management

Neither Ameriprise Financial Services nor any of its supervised persons accepts performance-based fees for its investment advisory services.

## Types of Clients

The Service is currently available on a limited basis through a subset of our financial advisors. Most Ameriprise financial advisors do not offer this Service at this time and therefore the Service may not be available to you.

The Service is intended for individuals; married couples; and domestic partners who meet various eligibility criteria such as retirement date, amount of assets earmarked for your Retirement Portfolio, assets held at Ameriprise Financial, and types and complexity of the investment accounts and other financial products you would like to designate for inclusion in the Service. At the time of enrollment, the Service also requires you to open or maintain at

least \$1,000,000 in net investable assets held at Ameriprise Financial Services and included in your Retirement Portfolio. If you enroll in the Service, you will be provided at least a 90 day period to satisfy applicable eligibility requirements. If your enrollment in the Service is not possible due to one of more eligibility factors, you will be notified.

**Married person as individual client:** If you are married and participating in the Service as an individual, your spouse is not a party to the Service Agreement. Your analysis and recommendations will be based on information that you provide regarding your retirement income planning goals, needs, and priorities.

## Methods of Analysis, Investment Strategies and Risk of Loss

The Service differs from an Ameriprise Managed Account or AFPS where your financial advisor develops advice and recommendations for you. The Service utilizes a centralized approach and financial advisor provides information about your preferences, financial situation, and goals to the Service team who will prepare recommendations for you.

To develop your retirement income plan, the Service Team utilizes the retirement goals, assets, income sources and other information you have provided in combination with research and analytics produced by Ameriprise Financial Services and its affiliates. This includes material prepared by the Ameriprise Investment Research Group ("IRG") and third-party research providers that have been approved by Ameriprise Financial Services.

The *Ameriprise* Premier Retirement Income Oversight Committee (the "Committee"), provides oversight for Service, including the methods of analysis and investment strategies utilized by the Service team to provide recommendations to clients.

Each Recommendation Report seeks to address the following key retirement income planning strategies. Not all strategies may be available to you:

**Basic financial position.** At a minimum, this will include a high-level compilation of the assets you intend to utilize for retirement, income (inflows) and expenses (outflows). It will also include action step(s) and/or an acknowledgement by the retirement income consulting team and your financial advisor that the figures are based on information provided by you at the time the analysis is completed.

**Covering Essential Expenses.** Seeks to provide dependable income sources. The Service can incorporate covering essential expenses such as housing, food, utilities, taxes and healthcare with solutions that may offer guaranteed or stable income so you can be confident your basic needs are covered. Consider your risk tolerance and individual circumstances with your advisor on whether covering essentials is right for you.

**Retirement Goals.** Seeks to provide portfolio construction and initial withdrawal amounts. Using the information you provide the Service team will provide you with recommendations that help you balance your need for regular income, resources for unexpected events and ending portfolio value.

**Social Security Claiming Strategy.** The Recommendation Report includes an evaluation of the options available to you to claim Social Security benefits so you can see the potential benefit you could receive at different ages and under different circumstances.

**Managing Risk.** Seeks to address asset bucketing and adaptive withdrawals. To help manage the risk of falling short of the amount needed to meet your retirement income goals, the Service will help you match your investments with the point in time when you need them in order to optimize the amount of income available.

**Tax Efficiency.** Seeks to address tax-efficient withdrawals, tax-loss harvesting, and asset location. The Service will help you to manage and save taxes you may pay throughout retirement.

**Ameriprise Financial Services and your financial advisor do not provide legal or tax advice as part of the Service or under any other circumstances.**

Your external accounts are analyzed and incorporated into the overall portfolio allocation recommendation and will be included for tax efficient withdrawal purposes. However, the Service does not provide security specific

recommendations in your investment accounts held outside of Ameriprise. For accounts held at Ameriprise Financial, your accounts will receive fully incorporated into the key retirement income planning strategies listed above.

When developing recommendations for you, the Service team compares your stated retirement income goals with your financial situation, retirement risk tolerance, investment horizon and potential investment solutions. The Service team may use current asset values, current and projected rates of return, and other assumptions you provide to your financial advisor, as well as historical return analysis prepared by Ameriprise Financial Services or an affiliate. Your Recommendation Report may be prepared through the use of one or more software packages to analyze your retirement income goals using one or more methods of analysis, including deterministic and probability modeling. The analysis and projections generated by the tools or other analysis described in this section of the Brochure include information regarding the likelihood of various potential investment outcomes. They are hypothetical in nature, vary with each use and over time, do not reflect actual investment results, and are not guarantees of future results.

**Investing in securities involves the risk of loss and you should be prepared to bear this loss.** The projections may also vary based on differing assumptions, and from one Recommendation Report to the next based on changing circumstances and market information. Results may reflect point in time estimates only and are only one of the many factors you should consider as you determine how best to plan for your future.

Your Recommendation Report also may include an asset allocation analysis designed to assist you in positioning your investment assets. If your Recommendation Report includes such analysis, the recommended portfolio allocation will be determined based on a variety of factors, including your personal financial information and Capital Market Assumptions for different asset classes provided by the Ameriprise Investment Research Group. The Recommendation Report will include, when appropriate for repositioning of your investment assets, recommendations to reposition your investment assets held at Ameriprise Financial Services, including recommendations to purchase mutual funds and ETFs. The Committee reviews and approves the eligible mutual funds and ETFs and the factors applied to produce the specific investments recommended.

The analysis is meant only to illustrate the relative experience among asset classes and portfolios. Periodic rebalancing of your portfolio and reallocation among the asset classes is recommended in most circumstances, but automatic ongoing rebalancing and reallocation is not part of the Service. Rebalancing your nonqualified portfolio to meet asset allocation objectives may result in taxable gains or losses. Unless included in a particular Ameriprise Managed Account Program, Ameriprise Financial Services does not rebalance your portfolio or reallocate your target asset allocations on a continuous basis. If you have a substantial percentage of your net worth concentrated in a given asset or asset class, the illustrations may recommend that you sell or exchange a significant portion of such position to reduce risk by reducing the concentrated positions within your portfolio. Special tax rules apply to net unrealized appreciation of employer securities held in a retirement plan. This is particularly true if the asset in question is a stock of your employer, given that both your income and investment could be tied to the profitability of your employer.

**Before you actually sell any such assets, consult with your legal and tax professionals regarding the tax and other implications of any such sales.**

The asset allocation analysis does not provide a comprehensive financial analysis of your ability to reach your other financial planning goals, and it does not identify the impact of your investment strategy on your tax and estate planning situations. Asset allocation does not guarantee a profit or protect against a loss.

## Sources of information

The principal source of information used by the Service team is the data provided by you, such as your personal data, assets and liabilities, income expectations, assumed overall rates of taxation, short-term and long-term retirement income planning goals, tax information, risk tolerance associated with goals, and other relevant information. Although the information and data are believed to be accurate, Ameriprise Financial Services and its financial advisors do not independently verify third-party information. Neither Ameriprise Financial Services nor its financial advisors guarantee the accuracy, completeness or timeliness of any such information nor do they imply any warranty of any kind regarding the information provided.

For your accounts held at Ameriprise Financial, market value (i.e., account value) is provided from the source of record and is generally captured at a point in time. If the date and market value displayed in analysis or written recommendations you receive does not correspond with the date and market value of your official Ameriprise Financial consolidated statement, the market values shown on the material you receive will differ from your consolidated statement.

**The information provided to you in your analysis and written recommendations is not intended to be a substitute for the valuation and other information contained in your official Ameriprise Financial consolidated statement.**

For your accounts and assets not held at Ameriprise Financial (“Non-Held Assets”) all asset and net worth information used in connection with your Service was provided by you or your designated agents and is shown as of the date it was provided to Ameriprise Financial Services. Ameriprise Financial services does not have knowledge of changes in your Non-Held Assets, including your accounts and portfolio holdings, and the materials provided in connection with your Service will not reflect changes to your Non-Held Assets. **This means that if we do not have access to or you do not update your Non-Held Assets, the information and assumptions provided to you will be based on data about Non-Held Assets that is not current.** Ameriprise Financial and your financial advisor take reasonable steps to reproduce information obtained from you or your designated agents regarding Non-Held Assets.

**Neither Ameriprise Financial nor your financial advisor has undertaken to review or verify the accuracy of Non-Held Assets and the inclusion of information and assumptions about Non-Held Assets in your Recommendation Report, or any other analysis, review, or guidance offered by Ameriprise Financial Services and your financial advisor creates no duty or other responsibility to advise you to take any action or inaction regarding such Non-Held Assets.**

## Investment strategies

The Service team may recommend long-term strategies such as long-term investing, reinvestment of dividends or other proceeds on investments, and asset allocation. Recommendations may also be made to help you realize capital gains or losses on securities or investment products that you own. Such transactions may have tax consequences for nonqualified accounts.

We cannot guarantee future financial results or the achievement of your retirement income planning goals through implementation of your Recommendation Report and any advice or recommendations provided to you by your financial advisor. Ameriprise Financial Services does not monitor the day-to-day performance of your specific investments. Before implementing your Recommendation Report, you should carefully consider the ramifications of purchasing products or services, and you may want to seek further advice from your lawyer and/or accountant, particularly in connection with estate planning and taxes.

## Investment and market risk

You should understand that:

- All investments involve the risk of loss and you should be prepared to bear such a loss (the amount of which may vary significantly),
- Investment performance or tax treatment of any accounts and assets included in your Retirement Portfolio can never be predicted or guaranteed,
- The market value of your Retirement Portfolio will fluctuate due to market conditions and other factors such as liquidity and volatility,
- There is no guarantee that the Service or its related recommendations will meet its objectives,
- Past performance does not predict future performance with respect to any product or service described in this Disclosure Brochure,
- All trading in your Ameriprise Accounts or other accounts will be at your risk.
- The risks of participating in the Service include but are not limited to the following:
  - **Market Risk.** Market risk refers to the possibility that the market values of securities or other investments will fall, sometimes rapidly or unpredictably, or fail to rise, because of a variety of actual or perceived factors affecting issuer, industry or sector in which it operates or the market as a whole.
  - **Interest Rate Risk.** The interest rate risk is the risk that investment value is sensitive to changes in interest rates. In general, a rise in interest rates may result in a price decline of fixed-income instruments. This risk may be heightened for longer maturity and duration instruments.

- **Inflation Risk.** Inflation risk is the uncertainty over the future value of an investment due to inflation. Investments may not keep pace with inflation, which may result in losses.
- **Liquidity Risk.** Liquidity risk is the risk associated with any event, circumstance, or characteristic of an investment or market that negatively impacts the ability to sell, or realize the proceeds from the sale of, an investment at a desirable time or price.
- **Tax Risk.** This is the risk that the tax treatment of certain investments and of the income and gain therefrom is uncertain and can vary over time.
- **Legal and Regulatory Risk.** This is the risk that new or revised laws or regulations may adversely affect investments included in the Service.
- **Business Disruption Risk.** This is the risk of business disruption of varying severity and scope occurring. The types of disruption may include, but not be limited to, firm-only disruption, disruption that affects a single building, a disruption that affects the entire city or business district, and disruption that affects the entire region. Please read more in Ameriprise Financials' Business Continuity Plan Disclosure and Ameriprise Financial Client Relationship Guide.
- **Cybersecurity Risk.** With the use of technologies such as internet to conduct business, businesses are susceptible to cybersecurity breaches, please read more at <https://www.ameriprise.com/privacy-security-fraud>.
- **Technology Risk.** Businesses must rely in part on digital and network technologies to conduct business, provide services and maintain business operations. These technology systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond control. Technology failures, whether deliberate or not, could have a material adverse effect and could result in, among other things, financial loss, reputational damage, regulatory penalties or the inability to conduct business.

The risks described above should not be considered to be an exhaustive list of all the risks which clients should consider.

## Disciplinary Information

Below is notice of certain regulatory and legal settlements entered into by Ameriprise Financial Services during the last ten years:

### Regulatory proceedings

Ameriprise Financial Services entered into each of the regulatory settlements listed below without admitting or denying the allegations.

### Securities and Exchange Commission ("SEC") and FINRA Actions

In August 2018, Ameriprise Financial Services reached a settlement with the SEC regarding allegations that from 2011 through 2014 the firm failed to adopt and implement policies and procedures reasonably designed to safeguard retail investor assets against misappropriation and failed to reasonably supervise five representatives with a view to preventing and detecting violations of certain federal securities laws by these representatives. The firm agreed to pay a civil penalty amount of \$4.5 million. The firm further reimbursed all impacted clients for the losses they incurred due to the misconduct. The firm also took steps to enhance policies, procedures and controls related to the safeguarding of client assets against theft or misappropriation by its associated persons and voluntarily retained a compliance consultant to assess and confirm the reasonableness of these policies, procedures and controls.

In December 2017, Ameriprise Financial Services reached a settlement with the SEC regarding allegations that from December 2010 through October 2013, the firm negligently relied on misrepresentations made by F- Squared Investments, Inc. regarding certain of its ETF portfolios and, as a result, the firm made false statements about the portfolios in certain advertisements. The SEC also alleged that the firm had failed to adopt and implement written

compliance policies and procedures reasonably designed to prevent the alleged violations. The firm agreed to pay a disgorgement amount of \$6.3 million plus prejudgment interest of \$700,000 and a civil penalty amount of \$1.75 million.

In September 2016, Ameriprise Financial Services reached a settlement with FINRA regarding allegations that between October 2011 and September 2013 the firm failed to detect and prevent the conversion, via wire transfers, of more than \$370,000 from five of its customers by one of its registered representatives. The customers were family members of the registered representative. FINRA also alleged this went undetected because the firm failed to establish, maintain, and enforce a supervisory system that was reasonably designed to review and monitor the transmittal of funds from accounts of customers to third parties, including those controlled by registered representatives of the firm. The firm paid restitution and a fine of \$850,000.

## Other financial industry activities and affiliations

Ameriprise Financial Services, LLC is a subsidiary of **Ameriprise Financial, Inc.** and conducts its activities directly and through its affiliates. These activities may be material to its investment advisory business or its investment advisory clients. These affiliates include companies under common control with Ameriprise Financial Services by virtue of their status as direct or indirect subsidiaries of Ameriprise Financial, Inc. The information below provides you an overview of the Ameriprise Financial, Inc. companies. These companies work together to offer you financial products and services designed to help you reach your financial goals.

### Broker-dealer

**Ameriprise Financial Services, LLC** is a registered investment adviser and broker-dealer with the SEC and is authorized to engage in the securities business in all 50 states as well as the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. Registration with the SEC does not imply a certain level of skill or training. Ameriprise Financial Services is also a member of FINRA and the Securities Investor Protection Corporation (“SIPC”). Ameriprise Financial Services is registered with the Commodity Futures Trading Commission (“CFTC”) as a commodity trading advisor (“CTA”) and has obtained membership with the National Futures Association (“NFA”) in connection with such CFTC registration.

In its capacity as a broker-dealer, Ameriprise Financial Services distributes or receives compensation from selling various products including but not limited to equities and fixed income products. Offerings include corporate bonds and municipal securities, mutual fund shares, ETFs, 529 plans, face-amount certificates, closed-end funds, preferred securities, UITs, non-traded REITs, non-traded BDCs, non-traded closed end funds, hedge fund offerings, structured products, real estate private placement offerings, exchange funds, private equity offerings, 1031 exchanges, fixed, structured and variable annuities, and fixed and variable insurance. Ameriprise Financial Services also sells managed futures funds that engage in trading commodity interests, including futures.

In addition, Ameriprise Financial Services is the distributor of the publicly offered face-amount certificates issued by **Ameriprise Certificate Company**.

Ameriprise Financial Services also may serve as an underwriter or member of a selling group for securities offerings, including those issued by affiliates.

Retail brokerage services are made available through Ameriprise Financial Services, which has an agreement with **American Enterprise Investment Services Inc.** (“AEIS”), a registered broker-dealer and an affiliate of Ameriprise Financial Services. Ameriprise Financial Services requires clients to agree in their client agreements that their account(s) are introduced by Ameriprise Financial Services to AEIS on a fully-disclosed basis, and that securities purchase and sale transactions in their account(s) shall be directed through AEIS. You should consider that not all investment advisory firms require clients to direct execution of transactions through a specific broker-dealer. Brokerage accounts are carried by, and brokerage transactions are cleared and settled through, AEIS, subject to AEIS policies to assure that the resultant price to the client is as favorable as possible under the prevailing market conditions. See the “Working in Your Best Interest-Regulation Best Interest Disclosure” for more information about potential conflicts of interest relating to brokerage transactions.

For purposes of Form ADV Part 2 certain Ameriprise Financial Services management persons are registered representatives of Ameriprise Financial Services in its capacity as a broker-dealer, registered representatives of American Enterprise Investment Services Inc., and are associated persons of Ameriprise Financial Services in its capacity as a commodity trading advisor.

Ameriprise Financial Services approves and opens accounts and accepts securities order instructions with respect to the accounts. AEIS serves as Ameriprise Financial Services' clearing agent in providing clearing and settlement services for transactions that are executed for customers of Ameriprise Financial Services. In exchange for a fee paid by Ameriprise Financial Services, AEIS provides clearing, custody, record keeping and all clearing functions for certain advice-based accounts.

In addition, AEIS may act as an agent in effecting securities transactions for certain Ameriprise Bank trust accounts.

**AMPF Holding LLC**, an indirect wholly-owned subsidiary of Ameriprise Financial, Inc., is a holding company for Ameriprise Financial Services and AEIS.

**Columbia Management Investment Distributors, Inc.** ("Columbia Management Investment Distributors"), an indirect wholly-owned subsidiary of Ameriprise Financial, Inc., is a registered broker-dealer serving as principal underwriter and distributor of registered mutual funds and other funds advised by affiliated companies Columbia Management Investment Advisers, LLC ("CMIA") and Columbia Wanger Asset Management, LLC, ("Columbia Wanger Asset Management") (collectively, "Columbia Management" or "Columbia"). These investment companies are collectively referred to as the "Columbia Funds."

## Investment company

Ameriprise Financial Services has arrangements with Ameriprise Certificate Company to distribute and sell its face-amount certificates and selling arrangements with Columbia Management Investment Distributors to distribute the Columbia Funds.

## Investment advisory firm

**Columbia Management Investment Advisers, LLC** is registered as an investment adviser with the SEC.

CMIA provides investment management services to:

- Columbia Funds, as well as Columbia ETFs, closed-end funds and private funds
- Ameriprise Certificate Company
- RiverSource, as well as the Columbia Funds underlying certain variable contracts issued by RiverSource
- Various wrap program sponsors, including Ameriprise Financial Services
- Other affiliated and unaffiliated clients.

Ameriprise Financial, Inc. has other subsidiaries that are registered as investment advisers with the SEC, including Threadneedle International Limited, Columbia Wanger Asset Management and Lionstone Partners, LLC. These subsidiaries are registered as investment advisers and may provide advice to domestic and foreign institutional clients, the Columbia Funds, the Columbia ETFs, the Columbia closed-end funds, private funds and other fiduciary clients. These entities provide services independent from Ameriprise Financial Services. Columbia Management and its affiliates Threadneedle Asset Management Ltd, (U.K. based), Threadneedle Investments Singapore (Pte.) Limited (Singapore based), and Columbia Threadneedle Investments (ME) Limited (Dubai based) operate under a combined global asset management brand, Columbia Threadneedle Investments.

Ameriprise Financial Inc. also has non-US subsidiaries that provide asset management services. These include Columbia Threadneedle Management Limited ("CTML"), Columbia Threadneedle Netherlands B.V. ("CTLN"), Columbia Threadneedle Business Limited ("CTBL"), Columbia Threadneedle AM (Asia) Limited ("CTAMLA"), Columbia Threadneedle (EM) Investments Limited ("CT (EM)") and Pyrford International Ltd ("Pyrford"). Each of CTML, CTLN, CTBL, CTAMLA, CT (EM) and Pyrford is registered with the appropriate respective regulators in their home jurisdictions. In addition CT (EM) and Pyrford are also registered with the SEC as investment advisers. Columbia Management Investment Advisers is also registered with the CFTC as a commodity pool operator and a



CTA and has obtained membership with the NFA in connection with such CFTC registration. Threadneedle International Limited is registered with the CFTC as CTA and has obtained membership with the NFA in connection with such CFTC registration.

## Banking institution

**Ameriprise Bank, FSB**, a wholly owned subsidiary of Ameriprise Financial, Inc. and an affiliate of Ameriprise Financial Services, is a federal savings bank. In addition to its participation in the AIMMA and ABISA Sweep Programs, Ameriprise Bank currently makes available a core set of banking products, including mortgage financing, co-branded credit cards with an associated rewards program, savings accounts, and pledged asset loans. Ameriprise Bank provides personal trust services to clients, including trustee and investment management services for asset trusts and irrevocable life insurance trusts, and investment management and custodial agency services for individual, individual trustee, association and non-profit organization accounts.

Ameriprise Financial Services establishes custodial accounts and accepts securities order instructions for trust accounts at Ameriprise Bank. In addition, Ameriprise Financial Services may provide investment advice and research support to Ameriprise Bank and its clients for these trust accounts.

## Trust company

**Ameriprise Trust Company** (“ATC”), a Minnesota-chartered trust company, provides custodial, investment management and collective trust fund services for employer-sponsored retirement plans, including pension, profit sharing, 401(k) and other qualified and nonqualified employee retirement plans. ATC also serves as custodian for IRAs, 403(b)s and some retirement plans qualified under section 401(a) of the Internal Revenue Code of 1986 as well as the Ameriprise Certificate Company. ATC is not a deposit bank or a member of FDIC.

## Insurance company

Insurance products sold by Ameriprise Financial Services and its financial advisors are issued primarily by **RiverSource Life Insurance Company**, a stock life insurance company that is qualified to do business as an insurance company in the District of Columbia, American Samoa and all states except New York; and in New York only, issued by **RiverSource Life Insurance Co. of New York**, a stock life insurance company that is qualified to do business as an insurance company in New York.

The products of RiverSource Life and RiverSource Life of NY include structured annuities (RiverSource Life only), fixed and variable annuities, fixed and variable life insurance, disability income insurance and life insurance with long-term care benefits. Insurance products are also offered by other third parties through an arrangement with Ameriprise Financial Services and through Diversified Brokerage Services, Inc. and Crump Insurance Services, Inc., which act as co-general agents.

**RiverSource Distributors, Inc.** (“RiverSource Distributors”), a wholly owned subsidiary of Ameriprise Financial, Inc., is a registered broker-dealer, serving as principal underwriter and distributor of RiverSource variable life insurance and annuities on behalf of RiverSource Life Insurance Company (“RiverSource Life”), and RiverSource Life’s wholly owned subsidiary, RiverSource Life Insurance Co. of New York (“RiverSource Life of NY”) (collectively, “RiverSource”). Ameriprise Financial Services has selling arrangements with RiverSource and RiverSource Distributors to distribute these products.

## Ameriprise Financial Institutions Group (“AFIG”)

AFIG is a business channel within Ameriprise Financial Services that specializes in delivering investment products and services to clients of financial institutions, such as banks and credit unions. Ameriprise Financial Services enters into a networking arrangement with each financial institution whereby AFIG financial advisors provide one or more of our investment advisory services, brokerage services and insurance products to clients of the financial institution and other persons or entities that may be introduced or referred to us by the financial institution. The financial institution provides AFIG financial advisors joint marketing access to a distinct client segment and may provide office space in the building where it conducts its business. As a part of the contractual arrangement with

the financial institution, Ameriprise Financial Services shares with the financial institution a portion of up to 91% of fees and commissions, including Wrap Fees charged for investment advisory services, generated by AFIG financial advisors that are attributable to our operations under the joint marketing agreement with the financial institution. A portion of these fees may be paid to financial advisors who are employees of the financial institution, as described below.

All AFIG financial advisors are licensed and registered through Ameriprise Financial Services. Ameriprise Financial Services has exclusive control over the activities conducted on our behalf under the agreement with the financial institution and is responsible for the supervision of the activities of AFIG financial advisors. AFIG financial advisors are affiliated with Ameriprise Financial Services in one of three ways: independent contractors, Ameriprise employee financial advisors and financial institution employee financial advisors. Financial advisors employed by the financial institution are compensated by the financial institution from the portion of fees and commissions it receives from Ameriprise Financial Services. In such cases the financial institution serves as paying agent on our behalf in accordance with applicable law. The level of compensation received by financial advisors employed by the financial institution is based on their employment agreement with the financial institution.

Ameriprise Financial Services does not pay any compensation to any non-registered employee or agent of the financial institution for referrals. Any referral fee paid by the financial institution to an employee or agent is a one-time, per-customer fee of a nominal, fixed dollar amount and is unrelated to the products and services you purchase.

AFIG financial advisors who provide services at a financial institution that does not have a Trust Department can offer trust services through other providers, including our affiliate, Ameriprise Bank. Ameriprise Financial Services and the AFIG financial advisor may serve as a finder related to trust services and may receive a referral fee for business referred to unaffiliated trust providers.

**Ameriprise Financial Services is not a bank or credit union. Any services or products you purchase through an AFIG financial advisor are not guaranteed or insured by Ameriprise Financial Services or the financial institution. The financial institution is not a party to your Client Agreement with us. Ameriprise Financial Services and each financial institution have entered into a networking agreement under which we have agreed to share fees and commissions with the financial institution, including Wrap Fees charged for investment advisory services. Non-registered employees of the financial institution may also receive compensation for referring you to Ameriprise Financial Services.**

## How we get paid

**This section should be read in connection with the “Advisory Business,” “Fees and Compensation” and/or the “Client Referrals and Other Compensation” sections in this Brochure.**

Ameriprise Financial Services and its affiliates receive revenue from several different sources on the products and services you purchase. These sources include the fees and charges you pay, other arrangements we have in place with product companies, and investment and interest income. The revenue generated or received supports, in part, the development of new products, maintenance of our infrastructure, and retention of employees and financial advisors. Further on in this section you will find information on how our financial advisors are paid.

## Cost Reimbursement Services and Third-Party Payments

**Payments from product companies.** AEIS will receive the following types of payments with respect to the investment products we recommend and you select for the investment of your applicable Managed Account assets. This compensation is used in part to fund the cost of providing the services, maintaining Managed Accounts and offering an investment platform for our clients as well as providing revenue and net earnings to AEIS. For qualified SPS Advisor Accounts and trustee-directed retirement plans in qualified SPS *Advantage* Accounts and eligible qualified Select Separate Accounts, AEIS either does not collect Third Party Payments or credits them back to client Accounts as described in the “**Fees and Compensation**” section.

AEIS performs certain services for the benefit of Ameriprise Financial Services, its financial advisors and clients, including but not limited to recordkeeping, administration and shareholder servicing support, applicable platform

level eligibility and investment product due diligence, investment research, training and education, client telephonic and other servicing, and other support related functions such as trading systems, asset allocation and performance reporting tools, websites and mobile applications (collectively “cost reimbursement services”). Any cost reimbursement payments received by AEIS that are paid by product sponsors out of assets of the investment, such as a mutual fund or unit investment trust, reduce the investor return on their investment.

AEIS also receives revenues that exceed the costs of the cost reimbursement services provided. These revenues include cost reimbursement and marketing support payments (as described below under the heading "Education, training, seminar reimbursement and noncash compensation") and such payments increase the gross revenues and net earnings of AEIS.

Ameriprise Financial Services has a financial incentive for its affiliate to continue to maintain these cost reimbursement arrangements, including arrangements with Full Participation Firms and for AEIS to continue to receive revenue. Because not all investments provide for cost reimbursement payments, AFSI has an incentive to recommend or select investment products that make such payments within Managed Account Programs. Ameriprise Financial Services addresses this conflict of interest by applying objective due diligence standards and requiring all mutual funds, ETFs, ETNs, CEFs, UITs and alternative investments such as hedge funds and managed futures funds offered in the Programs to meet these standards.

AEIS receives a variety of payments for cost reimbursement services from affiliated products sponsored or managed by affiliated investment advisers (e.g., Columbia Management) and by non-affiliated investment product companies which reimburse the costs of beneficial client services provided by Ameriprise Financial Services and AEIS. The most significant of these payments are reimbursement for marketing support received from the product companies. AEIS receives cost reimbursement payments from product companies for the following products: mutual funds, 529 plans, UITs, non-traded REITs, real estate private placements, tax-deferred real estate exchanges, non-traded BDCs, fixed/multi-year annuities, variable annuities, fixed index annuities, structured annuities, fixed insurance, variable insurance, structured products, managed futures funds, private equity offerings, non-traded closed end funds and hedge fund offerings.

Ameriprise Financial Services receives cost reimbursement payments on our affiliated and unaffiliated annuity and insurance products which are not eligible investments for Managed Accounts. These payments are discussed in the remaining paragraphs of this section.

If AEIS and its affiliates did not receive this compensation, Ameriprise Financial Services would likely charge higher fees or other charges to clients for the services provided. When evaluating the reasonableness of the fees and expenses incurred in a Managed Account, you should consider not just the Wrap Fee, but also the fund-level fees and other compensation that Ameriprise Financial Services and its affiliates receive including payments for cost reimbursement services described in this section and other cost reimbursement and marketing support payments received by us and our other affiliates, as described in the “**How we get paid**” and the “**Revenue sources for other Ameriprise Financial, Inc. companies**” sections of this Brochure as applicable.

**Mutual Fund and 529 Plan Marketing and Sales Support Payments.** Mutual fund and 529 plan marketing and sales support payments are received from certain mutual fund firms. These payments form a structure referred to here as the Ameriprise Financial Mutual Fund Program (“Mutual Fund Program”) with approximately 140 mutual fund families offered by Ameriprise Financial Services. The goal at Ameriprise Financial Services is to offer a wide range of mutual funds using the following criteria:

- Product breadth and strong-performing funds
- Financial strength of the firm
- Marketing and sales support payments paid to our affiliate AEIS to support cost reimbursement services  
Ability to provide product support and training to our financial advisors
- Tax benefits offered by individual states
- Overall quality of the 529 plan (specific to 529 plans)

Ameriprise financial advisors may offer, and clients are free to choose, mutual funds from approximately 140 fund families available. However, certain aspects of the Mutual Fund Program create a conflict of interest or incentive if Ameriprise Financial Services promotes, or Ameriprise financial advisors recommend, the mutual funds offered by a firm participating in the Mutual Fund Program versus mutual funds offered by nonparticipating firms. As further described below, these conflicts and incentives arise from the cost reimbursement related to Education, Training, Seminar Reimbursement and noncash compensation, provided to our financial advisors by, as well as the payments AEIS receives from, firms participating in the Mutual Fund Program and with other relationships with firms, including Columbia Management; see the section titled **“Columbia Funds”** below.

To be included in the Mutual Fund Program, firms have agreed to pay AEIS a portion of the revenue generated from the sale and/or management of mutual fund shares. Full Participation Firms make cost reimbursement payments at a higher level than do firms that have arrangements discussed in the **“Other financial relationships”** section. For each year a client holds shares of a particular mutual fund, the mutual fund’s advisor or distributor may pay to AEIS an amount based on the value of the collective mutual fund shares held in clients’ accounts (asset-based payment). AEIS receives an asset-based payment (up to 0.20% per year for mutual funds and 0.185% per year for 529 plans) on some or all of Ameriprise Financial Services clients’ assets managed by the participating firms.

Certain Full Participation Firms pay our affiliate AEIS more marketing support for certain types of mutual funds. In general, Full Participation Firms offer actively managed mutual funds that permit for cost reimbursement payments to be included in the Investment Costs charged by the mutual fund. The Investment Costs of actively managed mutual funds are generally higher than those of ETFs which do not currently make cost reimbursement payments. Ameriprise Financial Services has a financial incentive to offer actively managed mutual funds that make cost reimbursement payments to our affiliate. As a result, Ameriprise financial advisors may have an indirect incentive to sell such mutual funds. We address this incentive by offering a full range of investment product options. Ameriprise further addresses this conflict of interest by calculating the compensation paid to our financial advisors for all assets without regard to the amount of cost reimbursement payments we or our affiliates receive in connection with client investments in mutual funds and other investment products. Additionally, Ameriprise Financial Services does not share with our financial advisors the cost reimbursement payments we or our affiliates receive.

If your Account’s Sweep Program uses a money market mutual fund, AEIS receives cost reimbursement payments of up to 0.37% of the amount held in that money market fund Sweep Program. The amount that AEIS receives may be reduced based on fee waivers that are imposed by the money market fund firm.

These arrangements vary between firms and may be subject to change or renegotiation at any time. If a firm ceases to make cost reimbursement payments, AEIS would likely cease the distribution relationship with the mutual fund firm.

**Full Participation.** Thirty firms fully participate in the Mutual Fund Program. These fund firms include Columbia Threadneedle Investments, Allspring (formerly Wells Fargo), American Century Investments, BlackRock Funds, BNY Mellon, Delaware Investments, DWS Investments, Eaton Vance, Eventide Funds, Federated Hermes, Fidelity, First Eagle Funds, Goldman Sachs Asset Management, Invesco, Janus Henderson Investors, John Hancock Investments, JP Morgan Asset Management, Lord Abbott, MainStay Funds, MFS, Natixis Funds, Neuberger Berman, Nuveen, Principal, PGIM Investments, Putnam Investments, Virtus and Voya Funds. These firms are referred to as “Full Participation Firms.”

We offer 529 plans from twenty firms. Of those firms, sixteen are Full Participation Firms. These fund firms include American Century, BlackRock, Columbia Threadneedle, Fidelity, Franklin Templeton, Goldman Sachs, Hartford, Invesco, John Hancock, J.P. Morgan, MFS, Nuveen, Principal, Putnam, Virtus and Voya. Each of these firms is referred to as a “Full Participation Firm.”

The most current Mutual Fund Program information, as well as the previous calendar year’s totals of marketing support payments received from Full Participation firms, in addition to distribution support amounts, may be viewed online by visiting [www.ameriprise.com/funds](http://www.ameriprise.com/funds) and clicking on “An Investor’s Guide to Purchasing Mutual Funds and 529 Plans at Ameriprise Financial.”

**Education, Training, Seminar Reimbursement and noncash compensation.** Full Participation Firms provide to Ameriprise financial advisors and, in some cases, to their clients, education, training, and support services relating to the investment products they offer. These firms may reimburse Ameriprise Financial Services, and Ameriprise

Financial Services may subsequently reimburse Ameriprise financial advisors, for client/prospect education events and financial advisor sales meetings, seminars and training events, consistent with Ameriprise Financial Services policies. Ameriprise Financial Services and its financial advisors may also receive nominal noncash benefits from time to time. As a result, Ameriprise financial advisors may have a greater familiarity with and an incentive to sell investment products of Full Participation Firms.

## Other financial relationships

**Distribution Support Relationships.** AEIS also has cost reimbursement arrangements with firms for distribution support services. These “Available for Sale Firms” make payments to AEIS for distribution support but do not provide marketing and sales support, such as those provided by Full Participation Firms, and make payments at a lower percentage rate than Full Participation Firms. These firms make cost reimbursement payments to AEIS of up to 0.10% on assets for these services, which support the distribution of the fund’s shares and 529 plans by making them available on one or more Ameriprise Financial Services platforms. In addition, certain mutual funds’ distributors pay a fee to AEIS of up to 0.10% for cost reimbursement services provided for the mutual fund shares purchased during a given period (sales-based payment). These mutual fund firms do not provide marketing and sales support such as those provided by Full Participation Firms to Ameriprise financial advisors, thus they do not have the same access to financial advisors as Full Participation Firms.

Ameriprise Financial Services sells 529 plans from seven firms that do not make cost reimbursement payments to AEIS. Moreover, 529 plans offered by these firms are available for sale to in-state residents only. Those firms are: American Funds, Ascensus, Invesco, MFS, Orion, Union Bank & Trust and Virtus. In addition, Connecticut and Iowa restrict the sale of their state plans, offered by Hartford and Voya, respectively, to in-state residents only. Certain 529 plans may pay AEIS a fee of up to 1% of assets for NAV rollovers.

The mutual fund’s distributor or affiliate may also make payments to AEIS for networking and/or omnibus support and other client services and account maintenance activities. AEIS will also receive sub-transfer agency fees with respect to investments you make in affiliated and non-affiliated mutual funds. These fees vary depending on the mutual fund family and on whether the mutual fund keeps a separate record for each account (i.e., networked accounts) or relies on AEIS’s recordkeeping (i.e., omnibus accounts). Compensation for sub-transfer agency services may be up to \$12 per position annually for networked accounts, and up to \$19 per position annually for omnibus accounts or, if paid on an asset basis, from 0.10% to 0.15% annually of any amounts you have invested in such mutual funds. In the case of certain no-load fund families for which AEIS has a direct relationship, the compensation for sub-accounting, administrative and distribution support services are bundled into one asset-based fee, generally of up to 0.35% (which may include up to a 0.25% service fee) annually of the value of such shares held in an Account.

AEIS and its affiliates may have other relationships with firms whose mutual funds Ameriprise Financial Services offers. These relationships may include affiliates of firms acting as a sub-adviser to CMIA, CMIA acting as a sub-adviser to a third-party firm, or affiliates of a firm managing an investment portfolio within another Ameriprise Financial Services or affiliated product, such as a RiverSource variable annuity. Firms may use CMIA to manage an underlying investment option in products offered through the Mutual Fund Program.

AEIS has a marketing support agreement with BlackRock Advisors, LLC with respect to mutual fund positions held by Ameriprise Financial Services customers. BlackRock, Inc. owns more than 5% of the outstanding shares of Ameriprise Financial, Inc. stock.

Our affiliate CMIA has a marketing support agreement with Vanguard Group, Inc. with respect to the distribution of its investment products. Vanguard Group, Inc. owns more than 5% of the outstanding shares of Ameriprise Financial, Inc. stock.

**Columbia Funds.** AEIS and other affiliates of Ameriprise Financial Services provide certain administrative and transfer agent services to the Columbia Funds owned by Ameriprise Financial Services clients. Ameriprise Financial Services and its affiliates generally receive more revenue from sales of affiliated mutual funds than from sales of other mutual funds. Employee compensation and operating goals at all levels of the company are tied to the company’s success. Certain employees may receive higher compensation and other benefits based, in part, on assets invested in affiliated mutual funds.

**American Funds.** For both affiliated and unaffiliated mutual funds we offer, AEIS receives cost reimbursement payments from mutual fund firms of up to 0.20% of assets invested in those funds.

With most mutual fund firms, these payments are paid on an ongoing basis and determined solely based on total assets invested in the funds of a particular fund family held in clients' accounts. Rather than determining the amount of the payment solely on an asset-based basis, American Funds pays AEIS an annual negotiated platform fee based on a number of factors, including prior year assets, in accordance with their prospectus governing each mutual fund. This platform fee will not exceed 0.20% of assets and will also not exceed the limits set forth in the prospectus governing each fund. You can find the total dollar amounts we receive annually from American Funds, as of the previous calendar year, by visiting [www.ameriprise.com/funds](http://www.ameriprise.com/funds) and clicking on "An Investor's Guide to Purchasing Mutual Funds and 529 Plans at Ameriprise Financial." American Funds are generally no longer available for new purchases in Ameriprise brokerage accounts (other than add-on purchases into existing positions, which may continue), and thus new investments of American Funds can generally only be executed in our Managed Account Programs.

**Ameriprise Preferred Line of Credit.** AEIS receives compensation from Ameriprise Bank, FSB for its Ameriprise Preferred Line of Credit support services.

## Payments from other non-affiliated product companies

**Payments from hedge fund and managed futures sponsors.** AEIS, in consideration for its cost reimbursement services, may receive ongoing investor service and support fee payments from products sponsors of hedge funds and managed futures available in Ameriprise Managed Accounts. Depending on the product, AEIS will receive payments up to 0.25% of the assets invested in these products.

**Payments from UIT sponsors.** Certain UIT sponsors with which AEIS has agreements may pay AEIS cost reimbursement payments to help promote and support the offer, sale and servicing of UITs. These UIT sponsors are granted full access to Ameriprise Financial Services and our financial advisors to provide direct financial advisor education or sales support to promote their products. UIT sponsors without such agreements do not provide direct financial advisor education or sales support, thus they do not have the same access to financial advisors as full access firms. Such marketing and sales support may create a conflict of interest if Ameriprise Financial Services promotes, or Ameriprise financial advisors recommend, the UITs from UIT sponsors that have been granted full access versus UITs offered by nonparticipating firms. These conflicts may arise from the marketing and sales support provided to our financial advisors by, as well as the payments AEIS receives from, firms that have entered into such agreements.

AEIS will receive both a fixed dollar amount of cost reimbursement payments, based in part on projected UIT sales, as well as sales-based volume concessions. The total amount of these payments will not exceed 0.20% of total UIT sales.

**Payments from insurance companies.** Cost reimbursement payments are received by Ameriprise Financial Services and/or its affiliate, AEIS, from affiliated and unaffiliated insurance companies. Ameriprise Financial Services sells annuity and insurance products to its clients manufactured by its affiliate, RiverSource, as well as from select unaffiliated insurance companies.

RiverSource and potentially other unaffiliated insurance companies may be permitted to reimburse Ameriprise Financial Services or AEIS and these entities may subsequently reimburse Ameriprise financial advisors for client/prospect educational events and financial advisor sales meetings, seminars and training events consistent with Ameriprise Financial Services and AEIS policies, as applicable. These companies may also provide support to an Ameriprise Financial Services internal sales desk, which in turn provides support to financial advisors. As a result, Ameriprise financial advisors may have a greater familiarity with RiverSource insurance and annuity products and the unaffiliated insurance companies who provide added educational support.

Generally, unaffiliated insurance companies that issue annuities and life and disability income insurance policies do not provide direct client or financial advisor education or sales support, other than product training materials, product sales literature and addressing client service issues. However, in some instances direct financial advisor product education may occur. As a result, Ameriprise financial advisors may have a greater familiarity with RiverSource products.

From unaffiliated long-term care insurance product manufacturers, AEIS receives payments up to 27.5% of the commissionable premium. AEIS receives varying payments from unaffiliated life, disability and other insurance product manufacturers.

**Payments from structured products sponsors.** AEIS receives cost reimbursement for the sale of structured products. Depending on the structured product, AEIS will receive payments between 0.25% and 0.60% of the amount you invest, multiplied by the product's term up to a maximum of 1.6%. For example, a structured note with a three-year term and a 0.40% payout could have an upfront payment of 1.2% (three years x 0.40%).

**Payments for financial advisor support.** Separately, for structured products, managed futures funds and hedge funds, AEIS will receive marketing and sales support payments in the form of an optional subscription for financial advisor support for a fixed annual fee of up to \$250,000, which when combined with the payments described above for these types of investment products may exceed the ranges noted.

**Mutual Fund & ETF Recommended list ("Starting Point List").** Ameriprise financial advisors may make mutual fund recommendations based on a group of funds that appear on the Starting Point List. Financial advisors are not required to use the Starting Point List as their source for mutual fund and ETF recommendations, and mutual funds contained on the Starting Point List may not be equally available across both Managed Accounts and Ameriprise brokerage accounts. All ETFs available for sale at Ameriprise and all mutual funds offered by Full Participation Firms or Available for Sale Firms, as further discussed below, must meet Ameriprise Financial Services' due diligence standards to be eligible for inclusion on the Starting Point List. In developing the Starting Point List, the IRG applies a quantitative and qualitative evaluation process that includes an analysis of a fund's returns, risk and expenses; the tenure and quality of the investment team; the soundness of the process and consistent implementation; and the overarching health of the organization. Certain mutual funds and ETFs that would have otherwise been included on Starting Point were excluded due to their high investment minimums. Client suitability must be considered when trading mutual funds and ETFs, including breakpoint discount eligibility and NAV transfer ability. The funds on the Starting Point List are subject to change periodically, however changes to the Starting Point List should not be the sole reason to prompt trading.

The Starting Point List is developed by the IRG based on eligibility criteria established by Ameriprise Financial Services. Approximately 2,100 mutual funds are eligible for inclusion on the Starting Point List. The primary universe of ETFs includes funds available for sale at Ameriprise. The universe of mutual funds includes only mutual funds sponsored or managed by Full Participation Firms in the Mutual Fund Program. If a suitable mutual fund recommendation for a particular asset class cannot be found within the Full Participation Firms' offerings, the IRG will proceed to look for mutual fund options sponsored or managed by Available for Sale Firms.

While the Starting Point List is developed by evaluating the performance characteristics of each fund's Class A shares, the analysis is ultimately intended to apply at the mutual fund level. Mutual funds included on the Starting Point List may or may not offer an Advisory Share class or other share class that is available in our Managed Accounts Programs. As a result, Managed Account clients may be unable to purchase a fund on the Starting Point List. Similarly, Ameriprise brokerage account clients may be unable to purchase a mutual fund on the Starting Point List if that fund does not offer a share class available in Ameriprise brokerage accounts. In addition, some mutual funds included on the Starting Point List may offer lower-cost share classes than the Advisory Share class or other share class available in Managed Account Programs. You should consider whether you may be eligible to purchase these lower-cost share classes outside the Programs.

These eligibility criteria are designed by AFSI to primarily include, and therefore favor, mutual funds from Full Participation Firms. To be included in the Mutual Fund Program and be eligible for inclusion on the Starting Point List, each Full Participation Firm must meet a number of criteria that consider product breadth and strong-performing funds, financial strength of the firm and the ability to provide education and training to Ameriprise financial advisors, including marketing and sales support services relating to the funds they offer. Full Participation Firms have also agreed to pay our affiliate, AEIS, a portion of the revenue generated from the sale and/or management of fund shares as further described above.

Available for Sale Firms make payments at a lower percentage rate than Full Participation Firms. They do not have the same wholesaling access to financial advisors as Full Participation Firms. As a result, Ameriprise financial advisors may have a greater familiarity with and an incentive to sell funds of Full Participation Firms. The payments made to AEIS by Full Participation Firms and Available for Sale Firms reimburse the costs of client beneficial services provided by Ameriprise Financial Services and AEIS to financial advisors and clients, including but not limited to distribution, marketing, administration and shareholder servicing support, due diligence, training and education, and other support related functions (e.g., cost reimbursement services) and increase the revenues and profitability of AEIS. The most significant of these payments are reimbursement for marketing support received from

Full Participation Firms and other product companies. Full Participation Firms make cost reimbursement payments at a higher percentage rate than do Available for Sale Firms. This presents a conflict of interest as Full Participation Firms pay AEIS more revenue than Available for Sale Firms, and thus AEIS earns more revenue from the purchase of mutual funds offered by Full Participation Firms than from the purchase of mutual funds offered by Available for Sale Firms. Clients may choose to follow the recommendations provided by their Ameriprise financial advisor or they may select from any of the other funds offered through Ameriprise Financial Services regardless of whether that fund appears on the Starting Point List. More information on the Full Participation Firms that participate in the Program, specific arrangements we have with them, and conflicts of interest or incentives that exist for Ameriprise Financial Services to promote (and for Ameriprise financial advisors to recommend) one fund over another fund is provided on our website at [ameriprise.com/funds](http://ameriprise.com/funds) and click "Purchasing Mutual Funds Through Ameriprise."

## Revenue sources for Ameriprise Financial Services, LLC

**Financial planning and advisory service fees.** These are fees you pay for financial planning and fee-based investment advisory account services, respectively.

**Ameriprise brokerage account sales charges.** Sales charges, commissions and/or selling concessions are paid when you buy or sell equities or fixed income products including corporate bonds and municipal securities, mutual funds, 529 plans, closed-end funds, preferred securities, UITs, non-traded REITs, non-traded BDCs, non-traded closed-end funds, hedge fund offerings, exchange funds, private equity offerings, managed futures funds, real estate private placement offerings and structured products. In addition, you may pay a markup or markdown in bond transactions executed in a principal capacity with AEIS. These charges vary by product and product type. For example, with respect to mutual funds, the sales charge for a stock mutual fund is typically greater than that for a bond mutual fund. For other product types such as non-traded REITs, the sales charge you pay may also include a portion of the distribution, organization and offering fees and expenses. See the Working in Your Best Interest – Regulation Best Interest Disclosure for more information about costs, compensation and potential conflicts of interest relating to brokerage products and services.

**Periodic Fees.** Periodic fees include IRA custodial fees, brokerage fees (i.e., account maintenance and order handling fees), and a portion of the fees associated with certain banking products and services (i.e., personal trust services).

Sales charges, trading commissions, markups, markdowns and financial planning and advisory services fees are not eligible for reimbursement or offered at a discount.

**Periodic expenses.** Periodic expenses are paid from product assets, such as 12b-1 shareholder servicing fees paid from mutual fund assets (including 12b-1 fees paid on certain funds that serve as underlying investment options for 529 plan assets) and distribution fees paid from Ameriprise Certificate Company assets. 12b-1 shareholder servicing fees assessed in Ameriprise brokerage accounts may be used to pay for marketing, distribution and shareholder service expenses. Any 12b-1 shareholder servicing fees received for the share class utilized in any Managed Accounts will be rebated to clients.

**Ameriprise Preferred Line of Credit.** Ameriprise Financial Services receives compensation from Ameriprise Bank of 0.25% on an annualized basis of the amount of the credit line outstanding balance. This amount is shared with your Ameriprise financial advisor based on how your advisor is affiliated with us and on the payout rate for which your financial advisor qualifies. These affiliations and compensation structures are described in the "**How Our Financial Advisors Get Paid**" section of this Brochure.

**Ameriprise Bank Savings Account.** Ameriprise Financial Services receives compensation from Ameriprise Bank of 0.05% on a monthly basis of the amount of the average monthly balance. This amount is shared with your Ameriprise financial advisor based on how your advisor is affiliated with us and on the payout rate for which your financial advisor qualifies. These affiliations and compensation structures are described in the "**How Our Financial Advisors Get Paid**" section of this Brochure.

**Payments for referrals to structured settlements annuity brokers.** Ameriprise Financial Services receives a fee, shared with financial advisors, for referrals to non-affiliated structured settlement professionals for both client and non-client referrals. The amount and basis for the referral fee varies by relationship multiplied by the notional sales amount of the product.



**Underwriters' compensation.** Ameriprise Financial Services receives a fee comprised of a selling concession, management fee, underwriting fee, and in some cases, a structuring fee for the sale of initial public offerings ("IPOs") such as closed-end funds and preferred securities. The specific amounts vary by individual offering, and are disclosed in the prospectus of each offering.

**Distribution Access Fees.** Ameriprise Financial Services directs securities purchase and sale transactions through our affiliate, AEIS, on a fully disclosed basis. In exchange, Ameriprise Financial Services receives reimbursements from AEIS for our non-distribution related expenses.

## Financial interest in products

Ameriprise Financial Services has a financial interest in the sales of proprietary products that are manufactured by its affiliates. Ameriprise Financial Services and its affiliates receive more revenue from the sale of some financial products and services, particularly those products and services sold under the Ameriprise, Columbia Threadneedle Investments and RiverSource brands, than for the sale of other products and services.

Generally, Ameriprise Financial Services receives more revenue for securities or products sold in a fee-based account than for those sold with only a sales charge or commission. Higher revenue generally results in greater profitability for Ameriprise Financial Services. Employee compensation (including management and field leader compensation) and operating goals at all levels of the company are tied to the company's success. Management, sales leaders and other employees generally spend more of their time and resources promoting Ameriprise, Columbia Threadneedle Investments and RiverSource branded products and services.

Any 12b-1 fees received by Ameriprise Financial Services for mutual funds held in any Managed Accounts will be rebated to clients, and financial advisors do not receive compensation from 12b-1 fees assessed on mutual funds held in Managed Accounts. For brokerage accounts, both Ameriprise Financial Services and individual financial advisors are compensated when clients buy mutual funds through Ameriprise Financial Services. Generally, financial advisors receive a portion of the sales charge and 12b-1 fees paid to the firm in connection with mutual fund purchases for as long as clients own the mutual fund shares. Sales charges and 12b-1 fees vary from mutual fund to mutual fund and from share class to share class. Ameriprise Financial Services and the financial advisor receive more compensation on fund or share classes that pay higher fees.

Ameriprise Financial Services and the financial advisor generally receive less compensation when the sales charge and/or 12b-1 fee is reduced, waived completely, or where there is no sales charge or 12b-1 fee. Therefore, for brokerage accounts there is an incentive for our financial advisors to sell a fund that pays a load or a fund that pays a 12b-1 fee over funds that do not.

Ameriprise Financial Services and Ameriprise financial advisors are paid in different ways for helping you choose mutual funds, depending on the type of fund, amount invested, and share class purchased. Financial advisors receive compensation only from 12b-1 fees for mutual funds held in brokerage accounts. Ameriprise Financial Services and financial advisors receive more compensation for sales of certain types of products, such as insurance, rather than others.

## Economic benefits of affiliates' products and services

As with all financial services firms, a portion of our revenue and compensation can generate a profit for the firm. The revenue and compensation we receive helps us cover our expenses in providing and servicing these products and services. Employee and financial advisor compensation and operating goals at all levels of Ameriprise Financial, Inc. are tied to the success of its businesses. As a result, certain incentives and conflicts of interest may exist for Ameriprise Financial Services, our affiliates and our financial advisors if you purchase certain products or services recommended by your financial advisor.

Generally, among other things, Ameriprise Financial Services and our affiliates will receive:

- More revenue, in aggregate, from the purchase of products sponsored or managed by Ameriprise, Columbia Management and RiverSource ("proprietary products") than from the purchase of products sponsored or managed by firms that aren't affiliated with Ameriprise Financial, Inc. ("nonproprietary products"). Ameriprise

Financial Services actively promotes the products of our affiliates through advertising, direct mail, and product support and training events.

- More revenue from the purchase of products and services than from Wrap Fees.
- More revenue as the size of any margin account or Ameriprise Preferred Line of Credit balance increases.
- More revenue when you purchase certain types of products, such as insurance and annuity products and direct investments.
- More revenue from products and services that generate ongoing revenue streams, such as mutual funds that pay ongoing 12b-1 fees, an investment advisory account service, and insurance and annuity products with mortality and expense charges.
- More revenue when you purchase shares of mutual funds or 529 plans from Full Participation Firms than from firms with other distribution support relationships, as described in the **“Cost Reimbursement Services and Third-Party Payments”** section of this Brochure.
- More revenue when you purchase investment products for which we receive cost reimbursement payments or have similar financial arrangements, as described in the **“Cost Reimbursement Services and Third-Party Payments”** and **“Revenue Sources for Ameriprise Financial Services, LLC”** sections of this Brochure.
- Less revenue when a sales charge or commission is reduced or waived completely, or where there is no sales charge.
- More revenue when you move assets (including retirement plan accounts) from another institution to Ameriprise Financial Services or RiverSource or into a product managed by Columbia Management or another affiliate.

Generally, among other things, your financial advisor may earn:

- More depending on how your financial advisor is affiliated with Ameriprise Financial Services, as described in the **“How our financial advisors get paid”** section of this Brochure.
- More on the sale of certain fixed life and disability insurance products because of special compensation programs that provide increasing levels of compensation the more a financial advisor sells of these products from each individual insurance company.
- More on the purchase of annuity and insurance products and direct investments, because they are more complex than are other products and take more time to service.
- More revenue from products and services that generate ongoing revenue streams, such as mutual funds that pay ongoing 12b-1 fees, an investment advisory account service, and insurance and annuity products with mortality and expense charges.
- More from certain sales incentive programs to increase overall assets under management.
- Less on individual purchases within a transaction-based brokerage account because of the higher transaction charges your financial advisor pays on these accounts compared to a fee-based investment advisory account.
- Less when a sales charge or commission is reduced or waived completely, or where there is no sales charge.
- Typically, less when you exchange an existing annuity contract, mutual fund or insurance policy for certain like or similar products from the same company, unless you have held the existing product for a certain period of time.
- More revenue if you purchase securities on margin that you could not otherwise purchase in a cash account.
- Nominal additional compensation on the value of the assets rolled into an IRA brokerage account from a retirement account with Columbia Funds.
- A higher payout rate based on the level of product sales, on the number of financial plans sold, and on higher face/death benefit amount for certain insurance products.
- More when you move accounts (including retirement plan accounts) from another institution to Ameriprise Financial Services, CMIA or RiverSource.
- If your financial advisor is a shareholder of Ameriprise Financial through our deferred compensation program, more compensation the more profitable the firm is.

- Compensation for servicing trust accounts held with Ameriprise Bank.
- Compensation for performing certain activities associated with your mortgage if that loan is purchased and serviced by Ameriprise Bank.
- Compensation for providing services related to your Ameriprise Preferred Line of Credit based on an annualized fixed percentage of the client's average daily outstanding balance.
- Compensation for your Ameriprise Bank Savings Account balances based on an annualized fixed percentage of the client's average monthly balance.
- Compensation for marketing that leads to your opening of a co-branded credit card account provided you activate the card and meet the initial spend requirements.
- No compensation for the sale or renewal of Ameriprise Certificates.

Financial advisors are required to take training on complex products developed by Ameriprise Financial Services and its affiliates and non-affiliated product manufacturers, prior to soliciting, including certain RiverSource insurance and annuity products and a targeted subset of nonproprietary products. Additional general product training is available and specific product training is required for a number of complex products, including Columbia Threadneedle Investments and RiverSource branded products. It is likely that a product recommendation from your financial advisor will be drawn from the universe of products on which they were trained. Ameriprise Financial Services may enter into strategic alliances with companies that offer products or services that Ameriprise Financial Services and its financial advisors do not sell. As part of those alliances, Ameriprise financial advisors may receive gifts or non-cash compensation from the other companies, which are subject to SEC and FINRA regulations as well as Ameriprise Financial Services' internal compliance policies.

Some, but not all, of the financial planning software tools available for use by your financial advisor were developed by Ameriprise Financial Services or by unaffiliated third parties and may make it more convenient for your financial advisor to select proprietary products.

Most Ameriprise financial advisors are also appointed agents of RiverSource Life Insurance Company and, in New York only, RiverSource Life Insurance Co. of New York, affiliates of Ameriprise Financial Services.

Ameriprise Financial Services grants RiverSource limited access to Ameriprise financial advisors and provides RiverSource with limited information related to Ameriprise clients to promote sales of RiverSource products and to assist financial advisors in understanding the features and benefits of those products. Ameriprise Financial Services does not grant this access to other non-affiliated companies offering similar products, thus they do not have the same access to financial advisors as RiverSource.

Additionally, it is possible that Ameriprise Bank would send an order on behalf of a trust account to AEIS and at the same time AEIS would execute the opposite order for a brokerage client. Investments may be made for Ameriprise Bank's trust accounts in which Ameriprise Financial Services or its related persons have a position or interest. Although Ameriprise Financial Services and its related persons may own securities suitable for or held by clients, in no case will holdings of Ameriprise Financial, Inc., its subsidiaries or their employees or directors be directly sold to or purchased from Ameriprise Bank's trust accounts. AEIS, an affiliate of Ameriprise Financial Services, may buy or sell for its own account securities that Ameriprise Financial Services may recommend for the Ameriprise Bank's trust accounts.

Ameriprise Financial Services does not anticipate that conflicts of interest will arise because we have adopted policies and procedures prohibiting Ameriprise Financial Services and our related persons from engaging in trading activity that creates a conflict of interest with our clients, as discussed in the **"Code of Ethics, Participation or Interest in Transactions and Personal Trading"** section.

## How our financial advisors get paid

An Ameriprise financial advisor is assigned to every investment advisory service. Ameriprise financial advisors have a wide range of business and educational backgrounds. They are required to have appropriate licenses and registrations to transact business, including Financial Industry Regulatory Authority ("FINRA") registration, required

state securities and insurance licenses and carrier appointments and, where required, a state investment adviser representative registration.

Many financial advisors hold advanced academic degrees and/or professional designations, including the Certified Financial Planner™ (CFP®) designation. In addition, ongoing training is available to financial advisors. **For additional important information about an advisor check FINRA BrokerCheck at [www.finra.org/brokercheck](http://www.finra.org/brokercheck) or call 800.289.9999.**

Your financial advisor earns a living by providing you with financial advice and product recommendations to suit your goals. To understand how your financial advisor gets paid, you should first know that there are four ways Ameriprise financial advisors can be affiliated with us.

- **Independent contractor franchisees and independent contractors.** These financial advisors are not employed by Ameriprise Financial Services and they do not receive a salary from us.
- **Employee financial advisors.** These financial advisors are employed by Ameriprise Financial Services.
- **Associate financial advisors.** These financial advisors are employed by or contract with the independent contractor franchisees and they do not receive a salary or other compensation from Ameriprise Financial Services.
- **Financial institution employee financial advisors.** These financial advisors are employed by the financial institution where they provide services and are compensated by the financial institution from the portion of fees and commissions it receives from Ameriprise Financial Services. The financial institution serves as paying agent for such compensation on our behalf in accordance with applicable law. Financial institution employee financial advisors' compensation is based on their employment agreement with the financial institution.

All Ameriprise financial advisors are licensed registered representatives. Depending on the affiliation, our financial advisors are compensated differently. Financial advisors may choose to change how they are affiliated with Ameriprise Financial Services over time.

**Salary.** In addition to the fees described below, employee financial advisors may receive a salary or wage from Ameriprise Financial Services. Associate financial advisors may receive either a salary or a flat fee from the independent contractor franchisee for whom they work, at the discretion of the employing or contracting independent contractor franchisee.

Financial advisors may also have the potential to receive bonus compensation.

### ***Transaction-based Compensation***

The actual portion of commission-based fees paid to your financial advisor depends on the payout rate for which your financial advisor qualifies (the "advisor payout rate") and the amount of fees you pay.

### **Managed Account Advisory Fees and Transaction-based Compensation.**

The Service Fee is not shared with your financial advisor, however, your financial advisor earns compensation when you implement recommendations relating to the Service within your Managed Account, Ameriprise brokerage account, or purchase other products available from Ameriprise Financial Services and its affiliates. The actual portion of any Managed Account Advisory Fee or commission-based fees paid to your financial advisor depends on the payout rate for which your financial advisor qualifies and the amount of fees you pay.

- Independent contractor franchisees and independent contractors generally receive 72% to 91%, and employee financial advisors generally receive 0% to 46% of the advisory service fees and product commissions we receive (the "advisor payout rate").
- In addition, the financial advisor may qualify for a bonus which could increase the effective advisor payout rate up to 91% for independent contractor franchisees and 57% for employee financial advisors, respectively.
- Financial institution employee financial advisors generally receive an advisor payout rate of 0% to 91% based on their employment agreement with the financial institution.

- If you are a client of the Ameriprise Advisor Center, your financial advisor does not receive a portion of the fees but may receive compensation in the form of a bonus based in part on revenue generated through your fees.
- In general, fees generated by an associate financial advisor are paid to the employing or contracting independent contractor franchisee. At the discretion of the employing or contracting independent contractor franchisee, the associate financial advisor may receive financial advisory or referral fees or a bonus.

The compensation programs for our financial advisors may vary based on, among other factors, the financial advisor's industry experience, tenure with Ameriprise Financial Services, and whether the financial advisor was formerly associated with a firm acquired by Ameriprise Financial, Inc.

Ameriprise Financial Services offers a vast range of investment solutions to clients. Some products and services may be offered only by certain Ameriprise financial advisors. Discuss with your financial advisor the products he or she offers and the compensation your financial advisor receives, as some investment product companies and issuers, including RiverSource, may pay higher compensation than others.

Our financial advisors primarily offer life, and disability insurance and annuity products from RiverSource and certain pre-approved, but unaffiliated, insurance companies. However, in some situations where the client's needs may be met more effectively by another company's product, and RiverSource and other pre-approved providers do not offer such a product, Ameriprise financial advisors may offer insurance products issued by unaffiliated insurance companies.

If an unaffiliated insurance product is offered, the financial advisor is an appointed agent of the insurer and receives, directly or indirectly, compensation from the unaffiliated insurer for the sale and service of that product. The compensation for these nonproprietary products and RiverSource products is separate from, and in addition to, any fee you pay for investment advisory services and may vary depending on the type and size of the life insurance or annuity product that you purchase, the insurer that issues the product, and other factors. This compensation typically will increase as the size of the insurance policy or annuity contract increases, or the amount of the payments that you make on the life insurance or annuity product increases. Generally speaking, the compensation that the financial advisor will receive is calculated by a formula. Compensation may also increase as the financial advisor sells increasing amounts of life and disability income insurance products issued by that insurer.

In instances where a customer already owns a financial product sold by Ameriprise Financial Services, the amount of a financial advisor's compensation may vary in connection with the sale of an additional or replacement product, due to formulas relating to the cancellation of a product that is already owned.

As a result, the financial advisor in such a transaction may have an incentive to recommend the purchase of additional or replacement insurance or annuity products or, conversely, an incentive to recommend that you not purchase additional or replacement insurance or annuity products, depending on the relevant compensation formula.

Your financial advisor receives compensation for the marketing that leads to your opening of a co-branded credit card account provided you activate the card and meet initial spend requirements.

Ameriprise financial advisors will earn compensation for providing services related to your Ameriprise Preferred Line of Credit based on an annualized fixed percentage of the client's average daily outstanding balance.

Your financial advisor will receive compensation for performing certain activities associated with your mortgage if that loan is purchased and serviced by Ameriprise Bank.

Your financial advisor receives referral fees when you purchase and maintain Ameriprise Auto and Home insurance products under a long-term distribution agreement between Ameriprise Financial Services, American Family Insurance Group and Ameriprise Auto & Home. Ameriprise Auto & Home is not affiliated with Ameriprise Financial Services and is owned by the American Family Insurance Group. However, Ameriprise Auto & Home Insurance and the associated logo are being used by American Family Insurance Group under a temporary license from Ameriprise Financial.

If Ameriprise Bank accepts a trust based upon a referral from your financial advisor, Ameriprise Financial Services will receive a referral fee from the Bank. A portion of this referral fee is shared with your financial advisor. The referral fee is paid by the Bank from the fees earned for its services and is not an additional cost to the trust account. Your financial advisor also receives a referral fee for referrals to non-affiliated structured settlement professionals for both client and non-client referrals.

**Incentives, training and education.** Product companies with which we have agreements work with Ameriprise Financial Services and our financial advisors to promote their products. They may pay for training and education events or due diligence meetings; and may reimburse expenses for prospecting events such as seminars for employees, financial advisors, clients and prospective clients. For employees and financial advisors, these events may be held at off-site locations, and the travel, meals and accommodations may be paid for by the product company. Additionally, product companies may occasionally provide business or recreational entertainment or gifts of nominal value to employees and financial advisors.

Ameriprise Financial Services or sales leaders may, from time to time, offer contests or incentive programs to individual financial advisors or groups of financial advisors in particular areas. These contests and programs are limited to such targets as new client acquisition, financial plan count, net flows, total assets under management and financial advisor recruiting. Single product or product categories are not eligible for sales contests or incentive programs with the exception of fixed life and disability insurance. These programs and incentives and the receipt of other cash/noncash compensation could affect your financial advisor's recommendations of products and/or services to you. These programs and incentives and other cash and/or noncash compensation are subject to SEC and FINRA regulations as well as Ameriprise Financial Services' internal compliance policies.

Ameriprise Financial Services from time to time recruits financial advisors from other firms to join Ameriprise Financial Services. In connection with these recruiting efforts, Ameriprise Financial Services may enter into arrangements with financial advisors for the payment of compensation and/or loans based upon the value of eligible assets or accumulated production of the recruited financial advisor at a pre-determined measurement date. The funds may be payable immediately, over time, as a bonus, or as a loan. These arrangements may have been structured to include a provision requiring that payment of transition compensation and/or loans would be dependent upon the advisor meeting certain agreed-upon production and/or asset level benchmarks. The financial incentives associated with these transition arrangements could influence the type and amount of product and/or service recommended by your financial advisor. Ameriprise Financial Services manages this conflict of interest by supervising the suitability of recommendations made by its financial advisors in accordance with all applicable regulatory requirements. Please review your financial advisor's Form ADV brochure supplement or ask your advisor if you have questions about whether these transition arrangements apply to them.

From time to time, Ameriprise Financial Services also provides compensation to financial advisors in connection with the sale of all or a portion of their client base to an Ameriprise financial advisor. Some of this compensation may be dependent on a certain percentage of the client base remaining as clients of Ameriprise Financial Services for a certain period of time. It is also determined based on valuations of the financial advisor's practice, or book of business.

The practice valuation formula results in higher compensation for revenues received from Managed Accounts versus Ameriprise brokerage accounts. As a result, your financial advisor has an incentive to recommend the opening of new Managed Accounts or the investment of additional assets into existing Managed Accounts or, conversely, an incentive to recommend that you not open an Ameriprise brokerage account or invest additional assets into a brokerage account. In addition, if your financial advisor is selling all or a portion of their practice to another Ameriprise financial advisor, this program could incent your financial advisor to recommend you remain a client of the acquiring financial advisor and/or Ameriprise Financial Services.

**Ameriprise Financial, Inc. equity programs.** We encourage our financial advisors to take an ownership stake in our future by holding stock in our parent company, Ameriprise Financial, Inc. (NYSE: AMP). To make this possible for financial advisors, we have created equity compensation programs for them. Employee financial advisors and independent contractor franchisees may be eligible to receive an annual stock bonus. In addition, independent contractor franchisees may be eligible to defer a certain percentage of their compensation each year. They may choose to invest all or portion of this deferral into a notional account that tracks the performance of Ameriprise Financial, Inc. stock.

Financial advisors who are independent contractor franchisees may build equity in their practices and may receive payments if they sell all or a part of their practices to other Ameriprise financial advisors.

**Loan programs.** Clients may have access to information about lending products and services through marketing and/or lending relationships Ameriprise Bank has with third-party financial institutions. Financial advisors do not earn compensation related to the origination or referral of lending products (e.g., mortgages) offered and originated by third-party providers.



Ameriprise Bank partners with Embrace Home Loans, Inc. (NMLS#2184) that offers mortgage lending products and services. Ameriprise Financial Services and Ameriprise financial advisors do not accept any mortgage loan applications or offer or negotiate terms of any such loans. Financial advisors do not earn compensation related to the origination or referral of mortgage lending products offered and originated by such third-party providers. Ameriprise Bank may purchase and service some loans originated by Embrace Home Loans, Inc. Ameriprise Financial Services and Ameriprise financial advisors may receive compensation for assisting clients with mortgages serviced by Ameriprise Bank. Ameriprise Financial, Inc. is not affiliated with Embrace Home Loans, Inc. Ameriprise Bank does not guarantee products or services offered by Embrace Home Loans, Inc.

Ameriprise Bank has partnered with Elan Financial Services to make available Ameriprise co-branded credit cards. Your financial advisor receives compensation for marketing efforts that leads to your opening of a co-branded credit card account provided you activate the card and make sufficient purchases.

Ameriprise Bank has partnered with Goldman Sachs to make available the Ameriprise Preferred Line of Credit. Ameriprise financial advisors will earn compensation for providing services related to your Ameriprise Preferred Line of Credit based on an annualized fixed percentage of the client's average daily outstanding balance. With the exception of margin lending, offered by AEIS, neither your Ameriprise financial advisor nor Ameriprise Financial Services may arrange, promote, suggest or knowingly permit you to use loan proceeds to purchase securities or other investment products.

**Advisor-to-advisor training programs.** Ameriprise Financial Services or its affiliates may also pay its financial advisors for training other financial advisors on specific products and services that we offer. A portion of this payment may be based on incremental sales of these products and services sold by the financial advisor receiving the training.

**Shared compensation.** Financial advisors may also choose to work together as a team to share fees and commissions generated from products and services you purchase. The cost of the product or service you purchase is not affected by the fact that your financial advisor is a member of a team or by the fact that the fee or commission may be split. Your financial advisor may be allowed to share a portion of the Wrap Fee he or she receives with one or more other Ameriprise financial advisor(s), including financial advisors who have not completed the Ameriprise Financial Services-required training to sell the investment advisory service, franchise consultants or registered principals, as described below.

In cases where two or more financial advisors are assisting you, both financial advisors may share in the Wrap Fee. Your servicing financial advisor will present the Managed Account or APRI SERVICE, set the Wrap Fee, and oversee the analysis and advice prepared for you. Your servicing advisor may or may not be the financial advisor authorized to use discretion to purchase and sell securities in your account, e.g., your SPS Discretionary Advisor. In the instance that your servicing advisor is not authorized to use discretion, the financial advisor authorized to use discretion will oversee the analysis and advice prepared for you. Only the financial advisor authorized to use discretion will purchase and sell securities in our Account.

Your servicing advisor may or may not be the financial advisor who has completed the required training. A financial advisor who has not completed the required training may refer a client to a financial advisor who has completed the required training for the service or product. The financial advisor who has completed the required training may pay a fee to the financial advisor who has not completed the required training for that referral. The financial advisor who has not completed the required training may provide investment advisory services for services and products that do not require training, however, only the financial advisor who has completed the required training required for a particular service or product will provide the analysis and advice prepared for you with respect to a service or product that requires the training. The financial advisor who has not completed the required training may receive a share of the commission from any services or products sold to you by your financial advisor who has completed the required training.

Your financial advisor may work with a franchise consultant. In those situations, the franchise consultant, who is registered with Ameriprise Financial Services, may receive compensation based on services and products that you purchase, and for the training and leadership of your financial advisor. The cost of the product or service you purchase is not affected.

Your financial advisor may employ staff or work with other Ameriprise Financial Services staff to assist with creating your financial planning recommendations. This may include leveraging services in geographic locations outside of your financial advisor's location, including international locations.

Services provided may include entering data into financial planning software, providing initial calculation and assistance in creating solutions. Your financial advisor will provide final recommendations to you. For these services your financial advisor may pay a fee or salary to employed staff.

Financial advisors and field leaders may share compensation with their registered support assistants or recommend bonuses for their non-registered support staff.

Employee financial advisors and selling leaders may receive continuing commissions and fees for the sale of certain products and services for up to five years after leaving the securities industry.

Ameriprise offers a Business Development Account (BDA) Program. Eligible employee financial advisors may create a voluntary BDA in a predetermined amount and use this account for business-related expenses above and beyond what the company provides.

**Service relationship without a financial advisor.** In the event that you request Ameriprise Financial Services to remove your current financial advisor from your Service relationship for Premier Retirement Income or your financial advisor resigns from Ameriprise Financial Services or your Service relationship or is terminated, your Service relationship will no longer have an assigned financial advisor.

Ameriprise Financial Services may reassign your Service relationship to another financial advisor and notify you of the change.

**Management compensation and bonus programs.** Employee compensation and operating goals at all levels of the company are tied to the company's success. All employees, directly or indirectly, may receive higher compensation and other benefits when the investment products of certain providers, particularly affiliates, are purchased. Management, sales leaders and other employees spend more of their time and resources promoting Ameriprise, Columbia Threadneedle Investments, and RiverSource branded products and services.

Field leaders receive a salary and a bonus and are responsible for an operating budget for expenses. Bonus programs for Ameriprise Financial Services field leaders are designed to include an amount based on the aggregate sales of all products sold by financial advisors, including proprietary products, in the regions of the country those leaders are responsible for overseeing. The bonus incentive and expense programs present a potential conflict because they are based in part on sales of these products.

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

### Code of ethics

As part of an overall internal compliance program, Ameriprise Financial Services has adopted policies and procedures imposing certain conditions and restrictions on transactions for the account of Ameriprise Financial Services and the accounts of our employees. Such policies and procedures are designed to prevent, among other things, any improper or abusive conduct when potential conflicts of interest may exist with respect to a customer or client. In addition, from time to time, restrictions are imposed to address the potential for self-dealing and conflict of interest which may arise in connection with the business of Ameriprise Financial Services as a broker-dealer. Ameriprise Financial Services has adopted various procedures intended to guard against insider trading.

### Participation or interest in client transactions

From time to time Ameriprise Financial Services and/or its affiliates and related persons may invest in the same or related securities that Ameriprise Financial Services and/or its affiliates recommend to clients. Such transactions may occur at or about the same time that such securities are bought or sold for client accounts. Ameriprise Financial Services has adopted policies and procedures imposing certain conditions and restrictions on transactions in these securities, such as trading blackout periods and preclearance requirements.



See the **“Financial interest in products”** subsection in the **“Revenue Sources for Ameriprise Financial Services, LLC”** section in this Disclosure Brochure for more information about our financial interest in the sale of certain products and services.

## Personal trading rules and procedures

Ameriprise Financial Services has adopted personal trading rules and procedures within the Ameriprise Financial Code of Ethics and Personal Trading Policy. These rules are designed to list standards of business conduct and to mitigate potential conflicts of interest for all persons of Ameriprise Financial Services when they engage in personal securities transactions

The standards of business conduct include compliance with applicable laws and regulations and with policies and procedures such as those contained in the Ameriprise Global Code of Conduct. Under the personal trading rules, persons are required to report their personal securities holdings and transactions, including transactions in certain mutual funds; must pre-clear certain investments; are restricted with respect to the timing of certain investments; and are prohibited from making certain investments. In addition, the Personal Trading Policy requires (i) Ameriprise employee financial advisors and their employees, (ii) its independent contractor franchisee financial advisors and their employees, and (iii) its affiliated investment advisers to conduct most personal trades through one of three designated broker-dealers unless an exception has been granted, and report any changes in their selected broker-dealer.

## Insider trading policy

Ameriprise Financial Services and its related persons may, from time to time, come into possession of material nonpublic information that, if disclosed, might affect an investor’s decision to buy, sell or hold a security.

Under applicable law, Ameriprise Financial Services and its related persons are prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other person, regardless of whether such other person is a client. Accordingly, should Ameriprise Financial Services or its related persons come into possession of material nonpublic information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, their respective clients, and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, their clients when following policies and procedures designed to comply with law. Ameriprise Financial Services and its affiliates have adopted an “Insider Trading Policy” in accordance with Section 204A of the Advisers Act that establishes procedures intended to prevent the misuse of material nonpublic information by Ameriprise Financial Services and its associated persons.

Any client or prospective client may request a copy of the Ameriprise Financial Code of Ethics and Personal Trading Policy from his/her financial advisor or by contacting us at 800.290.6663.

## Brokerage Practices

Ameriprise Financial Services does not receive research or other products or services other than execution from any unaffiliated broker-dealer or other third party for client securities transactions. Ameriprise Financial Services receives and distributes research authored by its affiliate AEIS; however, this research is not provided for client securities transactions or for any other compensation. Nor do we or our affiliates receive client referrals from broker-dealers or third parties that are considered in selecting or recommending broker-dealers.

Retail brokerage services are made available through Ameriprise Financial Services. Ameriprise Financial Services and AEIS have an agreement in which Ameriprise Financial Services introduces customer accounts to AEIS on a fully disclosed basis. AEIS serves as Ameriprise Financial Services’ clearing agent in providing, clearing, custody and settlement services for transactions that are executed for customers of Ameriprise Financial Services. Ameriprise Financial Services approves and opens accounts and accepts securities order instructions with respect to the accounts. In exchange for a fee paid by Ameriprise Financial Services, AEIS provides, record keeping, custody, and all clearing functions for accounts introduced by Ameriprise Financial Services.

Under certain circumstances, when AEIS deems a transaction to be in the best interests of you and other clients, and to the extent permitted by applicable law and regulation, AEIS is permitted to aggregate multiple client orders to obtain what AEIS believes will be the most favorable price and/or lower execution costs at the time of execution.

## Review of Accounts

Certain supervisory functions are performed by Ameriprise Financial Services corporate office personnel. Corporate registered principals review a sampling of Service relationships, including Recommendation Reports.

When appropriate, our corporate registered principals may also decide to call you directly to discuss your understanding of the Service, including the fees and expenses you will be paying. Our Compliance department also conducts routine surveillance of financial advisor activities.

An important part of a Service relationship involves providing you with the opportunity to engage in periodic reviews with your financial advisor or a designated member of the team servicing your Service. In these reviews, you and your financial advisor should discuss any changes to your individual circumstances, financial situations, investment objectives and/or risk tolerance.

Our supervision and surveillance do not substitute for your continued review and monitoring of your Service or any related Managed Account(s). You should review your account statements, trade confirmations, and other information we send to you. If you have any questions or concerns, please discuss them with your financial advisor.

## Client Referrals and Other Compensation

### Referral arrangements and other economic benefits

Ameriprise Financial Services maintains investment advisory referral arrangements, the terms of which are disclosed to the client, with individual professionals, professional firms, and select corporate, institutional or membership organizations ("Promoters"). For each such arrangement, Ameriprise Financial Services pays the Promoter for referral of their clients or members to Ameriprise Financial Services for its financial advisory services. The manner and amount of compensation to be paid in connection with these agreements is subject to negotiation between Ameriprise Financial Services and the applicable Promoter. Prospective clients are provided applicable disclosures, including whether the Promoter is a client, the material terms of compensation (if any) and the material conflicts of interest (if any), that results from the Promoter's relationship with Ameriprise Financial Services. The most common compensation arrangements include a flat fee at the time of the referral, a recurring flat fee, or a sharing of a portion of any total Asset-based Fees. You will not be charged an additional fee as a result of any referral arrangements. Compensation may include a one-time payment or ongoing payments for the duration of the investment advisory relationship.

Ameriprise Financial Services may form networking arrangements with financial institutions such as banks, credit unions, credit union service organizations, Farm Credit Services and trust service providers ("Third-Party Financial Institutions") to allow its financial advisors to offer investment advisory services, financial planning services and certain other non-deposit investment and insurance products and services, (described elsewhere in this Brochure), to retail customers or members of the Third Party Financial Institutions. Under the terms of these networking arrangements, financial advisors may not be able to offer to retail customers or members of the Third-Party Financial Institutions certain products that are otherwise available through Ameriprise Financial Services or its affiliates. Also as a result of these alliances or networking arrangements, Third-Party Financial Institutions may receive, in the form of a networking payment, a portion of Asset-based Fees and securities and insurance commissions paid to financial advisors for sales to retail customers or members of the Third Party Financial Institutions.

## Review of issuers of financial products

Ameriprise Financial Services and its affiliates have policies and procedures in place to review the issuers of financial products such as non-traded REITs, non-traded BDCs, non-traded closed-end funds, structured notes, and annuity and insurance products that Ameriprise Financial Services permits its financial advisors to offer to some or all of its clients. This review includes publicly available information and reports issued by third parties and may in some cases include certain nonpublic information provided by the issuer. Ameriprise Financial Services periodically reassesses, but does not continuously monitor, the creditworthiness or financial solvency of third-party issuers. These policies and procedures are reasonably designed to mitigate our clients' exposure to credit and default risks resulting from an inability of the issuer to repay the principal on a note or fulfill an insurance obligation. However, you should be advised that credit markets can be volatile and the creditworthiness of an issuer may change rapidly. Ameriprise Financial Services, as a seller of these products, is prohibited by regulation from guaranteeing or providing any assurance that an issuer of financial products will be able to fulfill the issuer's obligation to any purchaser of such a product through Ameriprise Financial Services.

## Revenue sources for RiverSource Life Insurance Company and, in New York only, RiverSource Life Insurance Co. of New York (collectively "RiverSource")

**Sales charges.** You pay sales and other charges under RiverSource fixed, and variable annuity contracts and life insurance policies. You may incur transaction costs or fees associated with structured annuities. You may pay a contingent deferred sales charge, or surrender charge, if you withdraw funds during the applicable period.

**Periodic fees and expenses.** You pay certain fees and expenses under RiverSource annuity contracts and life insurance policies, including (depending on the type of contract or policy) mortality and expense, administrative, policy, contract, and cost of insurance fees or charges, in addition to costs associated with certain riders that may be available for both fixed, structured and variable products.

Periodic expenses are also paid from product assets, such as 12b-1 fees paid on certain funds that serve as underlying investment options for variable annuities and variable life insurance. 12b-1 fees may be used to pay for marketing, distribution and shareholder service expenses.

**Investment and interest income.** Investment and interest income from insurance company general account assets derived, in part, from the amounts you pay for insurance and annuity benefits.

**Variable annuity and variable life insurance financial arrangements.** RiverSource selects the funds available within your variable annuity contract or variable life insurance policy. In doing so, RiverSource may consider various objective and subjective factors. These factors include compensation RiverSource may receive from fund assets (for those funds with 12b-1 plans); assets of the fund's adviser, subadviser or an affiliate of either; and assets of the fund's distributor or an affiliate. This compensation benefits RiverSource.

The amount of this revenue varies by fund, may be significant and may create potential conflicts of interest for RiverSource. The greatest amount and percentage of revenue that RiverSource receives comes from assets allocated to subaccounts investing in funds managed by its affiliates, CMIA, and Columbia Wanger Asset Management. In general, the revenue directly related to assets under management that RiverSource receives currently ranges up to 0.65% of the average daily net assets invested in the underlying funds through the variable annuity or variable life insurance contracts RiverSource issues. This revenue is in addition to revenues RiverSource receives from the charges you pay when buying, owning or surrendering your variable annuity contract or life insurance policy. In accordance with applicable laws, regulations and the terms of the agreements under which such revenue is paid, RiverSource may receive this compensation for various purposes including financial advisor training and compensation, marketing and distribution, customer servicing, transaction processing, record keeping, and other administrative services.

## Revenue sources for Columbia Management and Threadneedle

**Periodic fees and expenses.** Columbia Management and Threadneedle International Limited may receive management fees and certificate advisory and services fees for services, including, with respect to Columbia Management, investment management services for *Active Portfolios*® investments. These revenues may be received from the Columbia Funds, Columbia ETFs, Columbia closed-end funds, Ameriprise certificates and from other affiliated and nonaffiliated advisory clients of Columbia Management and Threadneedle International Limited.

## Revenue sources for other Ameriprise Financial, Inc. companies

There are a number of other Ameriprise Financial, Inc. companies that will receive revenue from the charges and fees you pay, including the following:

- Ameriprise Certificate Company receives investment spread income earned on, and any early withdrawal penalty related to, Ameriprise certificates.
- Columbia Management Investment Services Corp. receives certain fees and expenses paid from the Columbia Funds and Ameriprise certificates in exchange for the transfer agent services it provides.
- American Enterprise Investment Services Inc. is compensated for its services through the brokerage commission and other fees charged for each brokerage transaction, which may include transactions made in a Ameriprise Bank trust account, or through the brokerage commission which is included in the overall asset-based fee, depending on the account option you select.
- If the Sweep Program for your Account is AIMMA, AEIS receives compensation from the Program Banks based on the cash balance in the AIMMA program. If your account sweeps uninvested cash to ABISA or to Ameriprise Bank as the Program Bank in the AIMMA program, Ameriprise Bank does not compensate AEIS, but reimburses AEIS for its direct out-of-pocket expenses related to the sweep services provided.
- AEIS receives compensation in the form of interest charged on your margin account balance as well as from order handling fees. In transaction-based brokerage accounts, AEIS may also engage in principal trading of certain types of fixed income securities for brokerage accounts—that is, it may buy and sell these securities for its own account with the objective of making a profit in certain circumstances, AEIS may buy these securities from you or sell these securities to you on a principal basis, in which case you will pay a markup or markdown on the transaction.
- AEIS performs, for the benefit of Ameriprise Financial Services, its financial advisors and clients, cost reimbursement and marketing support services as described in the “Cost Reimbursement and Marketing Support” section. In recognition of the above, Ameriprise Financial Services will compensate AEIS for such services that are performed by AEIS.
- The capacity in which AEIS acts in any particular transaction is disclosed on each transaction confirmation you receive. AEIS is also compensated for the shareholder services it provides for certain mutual fund companies. These services include but are not limited to delivering shareholder communications such as updated prospectuses and statements of additional information, transaction confirmations and annual tax reporting, and monitoring compliance with share class, discounted sales charge, market timing and other mutual fund company policies.
- Ameriprise Financial, Inc. receives fees paid from Columbia and the Columbia Funds and Ameriprise certificates in exchange for the administrative services it provides.
- Columbia Management Investment Distributors receives fees paid from the Columbia Funds in exchange for the distribution services it provides. Ameriprise Financial Services has a financial interest in the sale of the Columbia Funds, Ameriprise certificates and RiverSource products and certain other mutual funds.
- Ameriprise Financial Services sells annuity and insurance products manufactured by its RiverSource affiliates, as well as products from unaffiliated providers. RiverSource is permitted to reimburse Ameriprise Financial Services for client/prospect education events and advisor sales meetings, seminars, and training events pertaining to annuity and insurance products, consistent with Ameriprise Financial Services policies and industry regulation.

- Ameriprise Financial Services may also receive nominal noncash benefits from time to time. Unaffiliated annuity and insurance providers may not provide some services, or the same level of services, to Ameriprise financial advisors. As a result, Ameriprise financial advisors may have a greater familiarity with RiverSource annuity and insurance products.
- Ameriprise Bank charges a fee, depending on the terms of trust documentation and applicable state laws governing trust administration, through either the traditional investment model or advisor-based model. In the traditional investment model, Ameriprise Bank provides investment management and assumes administrative responsibility, therefore earning a fee. Ameriprise Bank earns a fee and pays a portion of the fee it collects to Ameriprise Financial Services. In the advisor-based investment model, Ameriprise Bank fees for administrative services are separate from investment management fees charged by financial advisors and are not shared with Ameriprise Financial Services.
- When Ameriprise Bank is a Program Bank in the AIMMA program or ABISA is the Sweep Option, Ameriprise Bank earns income by lending or investing the deposits it receives and charging a higher interest rate to borrowers, or earning a higher yield, than it pays on the deposits held through these sweep programs. The difference is known as the "spread."
- Ameriprise Bank earns revenue based on the amount of credit extended and the interest rate on the Ameriprise Preferred Line of Credit.

## Custody

Ameriprise Financial services does not maintain custody of client funds or securities or take possession of any assets in any Managed Account. AEIS, one of our broker-dealer affiliates, provides custody and safekeeping services for Managed Account assets and will ordinarily act as the custodian for all assets held in a Managed Account. Because our affiliate maintains custody of our clients' assets, we are required by SEC rules and regulations to obtain from AEIS at least annually a written internal control report (the "ICR") prepared by a qualified independent public accountant, and AEIS is required to undergo an independent verification of the assets under its control. The ICR that we receive from AEIS is intended to show that our affiliate has established appropriate custodial controls with respect to client assets under custody. For Retirement Accounts where Ameriprise Trust Company ("ATC") acts as custodian or trustee, AEIS shall act as an agent or sub-custodian of ATC with respect to custody of assets.

## Investment Discretion

None of Ameriprise Financial Services, the Service team or your Ameriprise financial advisor manages or exercises investment discretion over your securities or other investments on your behalf as part of the Service.

## Voting Client Securities

Ameriprise Financial Services does not offer proxy voting services with respect to accounts included in the Service.

Ameriprise Financial Services and your financial advisor do not take any action or give advice regarding the voting of proxies solicited by or with respect to the issuers of securities in which assets of your Ameriprise brokerage account(s) or Managed Account(s) may be invested, except for certain Select Separate Accounts where you delegate proxy voting authority to Ameriprise Financial Services. In all other instances, Ameriprise Financial Services will forward to you or your designated agent, all proxy solicitations and materials related to other corporate actions that are received by Ameriprise Financial Services with respect to assets in your Ameriprise brokerage account(s) or Managed Account(s). You are responsible for voting such proxies and effectuating other corporate actions relating to the securities held in your respective account(s).



## **Report of Independent Registered Public Accounting Firm**

To the Board of Directors and Member of Ameriprise Financial Services, LLC

### **Opinion on the Financial Statement – Statement of Financial Condition**

We have audited the accompanying Statement of Financial Condition of Ameriprise Financial Services, LLC (the "Company") as of December 31, 2022, including the related notes (collectively referred to as the "financial statement"). In our opinion, the financial statement presents fairly, in all material respects, the financial position of the Company as of December 31, 2022 in conformity with accounting principles generally accepted in the United States of America.

### **Basis for Opinion**

The financial statement is the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statement based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit of this financial statement in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement, whether due to error or fraud.

Our audit included performing procedures to assess the risks of material misstatement of the financial statement, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statement. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statement. We believe that our audit provides a reasonable basis for our opinion.

*PricewaterhouseCoopers LLP*

PricewaterhouseCoopers LLP  
February 23, 2023

We have served as the Company's auditor since 2010.

Ameriprise Financial Services, LLC  
Statement of Financial Condition  
December 31, 2022  
(In thousands)

Assets	
Cash and cash equivalents	\$ 676,860
Cash segregated under federal and other regulations	32,477
Receivables:	
Fees due from affiliates	96,084
Financial advisors and employees (net of allowance for credit losses of \$700,000)	2,596
Distribution fees and other (net of allowance for credit losses of \$3,241)	75,573
Secured demand note receivable from Parent	200,000
Goodwill	173,918
Intangibles (net of accumulated amortization of \$143,265)	72,889
Prepaid commissions	130,414
Other assets	68,086
Total assets	<u>\$ 1,528,897</u>
Liabilities and Member's Equity	
Liabilities:	
Accounts payable, accrued expenses and unearned revenue:	
Due to affiliates	\$ 158,361
Field force compensation	278,360
Salaries and employee benefits	167,580
Unearned revenue	159,715
Other liabilities	144,144
Total accounts payable, accrued expenses and unearned revenue	<u>908,160</u>
Liabilities subordinated to the claims of general creditors	200,000
Total Liabilities	<u>1,108,160</u>
Commitments and contingencies (see note 8)	
Total member's equity	420,737
Total liabilities and members's equity	<u>\$ 1,528,897</u>

*The accompanying notes are an integral part of these financial statements.*



Ameriprise Financial Services, LLC  
Notes to Statement of Financial Condition  
(In thousands)  
December 31, 2022

**1. Organization, Basis of Presentation, and Summary of Significant Accounting Policies**

**Organization**

Ameriprise Financial Services, LLC (the Company) is a wholly owned subsidiary of AMPF Holding Corp LLC. AMPF Holding LLC is a wholly owned subsidiary of Ameriprise Financial, Inc. (the Parent). The Company was previously known as Ameriprise Financial Services, Inc., but was converted to a limited liability company effective January 2020. The Company is registered with the Securities and Exchange Commission (SEC) and the various states in which the Company conducts business as an introducing broker-dealer and is a member of the Financial Industry Regulatory Authority, Inc. (FINRA) and the Securities Investor Protection Corporation (SIPC). In addition, the Company is a registered investment adviser with the SEC pursuant to the Investment Advisers Act of 1940. The Company is registered as a Commodity Trading Advisor (CTA) with the U.S. Commodity Futures Trading Commission (CFTC) and is a member of, and the corresponding services function is regulated by, the National Futures Association (NFA). The Company is required to comply with all applicable rules and regulations of the SEC, FINRA, CFTC, NFA and SIPC.

The Company clears most transactions with an affiliate, American Enterprise Investment Services, Inc. (AEIS), which under a clearing agreement charges the Company clearing fees on a per trade basis or based on assets under management. AEIS is primarily dependent on the Company for the introduction of clients and gathering of client assets which generates AEIS's revenues. As a result, the Company charges a distribution access fee based on a fixed contractual amount for ongoing access to the Company's financial advisors, client servicing and product distribution efforts.

The Company offers financial planning and investment advisory services to retail clients for which it charges a fee through an advisor-based distribution channel. These services are designed to provide comprehensive advice, when appropriate, to address clients' cash and liquidity, asset accumulation, income, protection, and estate and wealth transfer needs. To complete their advice services, the Company's financial advisors provide clients with recommendations from more than one hundred products distributed by subsidiaries and affiliates of the Parent, as well as products of approved third parties.

The financial advisors are either non-employee independent contractors operating through a nationwide franchise system, or they may choose to be employees of the Company. Due to differing levels of support provided to advisors operating in these various platforms, advisors are compensated at different percentages of the gross dealer concessions allowed for the various product offerings.

To complement its advisor-based channel, the Company also offers an integrated direct retail distribution channel. Direct distribution services are provided through the Company's online brokerage offering, which allows clients to purchase and sell securities online, obtain research and information about a wide variety of securities, use asset allocation and financial planning tools, contact advisors, as well as access a wide range of proprietary and non-proprietary mutual funds.

**Basis of Presentation**

The preparation of the financial statements in conformity with accounting principles generally accepted in the United States (U.S. GAAP) requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, disclosure of contingent assets and liabilities, and the reported amounts of revenues and expenses. These accounting estimates reflect the best judgment of management and actual amounts could differ significantly from those estimates.

**Significant Accounting Policies**

*Income taxes:* In January 2020 the Company converted to a limited liability company and became a disregarded entity for the 2020 tax year. The Company is included in the consolidated tax returns filed by the Parent. However, as a limited liability company that is not subject to tax and considered a disregarded entity for tax purposes, the Company and the Parent have elected to not allocate the consolidated amount of current and deferred tax expenses to the Company (see Note 2).



Ameriprise Financial Services, LLC  
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Prior to 2020, the Company's provision for income taxes represented the net amount of income taxes that the Company expected to pay or to receive from various taxing jurisdictions in which it had operations. The Company provided for income taxes based on amounts that the Company believed it would ultimately owe considering the recognition and measurement for uncertain tax positions. Inherent in the provision for income taxes were estimates and judgments regarding the tax treatment of certain items. The Company's taxable income was included in the consolidated federal and state income tax returns of the Parent. The Company provided for income taxes on a separate return basis, except that, under an agreement between the Parent and the Company, tax benefits were recognized for losses to the extent they could be used in the consolidated return. It was the policy of the Parent to reimburse its subsidiaries for any tax benefits recorded.

In connection with the provision for income taxes, the financial statements reflected certain amounts related to deferred tax assets and liabilities, which resulted from temporary differences between the assets and liabilities measured for financial statement purposes versus the assets and liabilities measured for tax return purposes.

*Cash and cash equivalents:* The Company have defined cash and cash equivalents to include money market funds, commercial paper, time deposits and other highly liquid investments with original or remaining maturities at the time of purchase of 90 days or less. The Company has evaluated the cash equivalents for credit risk and has determined it is negligible due to the short-term nature of the investment.

*Cash segregated under federal and other regulations:* Pursuant to Rule 15c3-3 Section (k)(2)(i), all cash received from customers is held in segregated accounts established solely for the benefit of customers until it is forwarded to affiliates.

*Allowance for credit losses:* Financial advisors are required to pay for certain support services provided by the Company. The Company reserves for any outstanding receivables from financial advisors that it does not believe are recoverable. The Company reserves for fees receivable related to marketing support arrangements for sales of mutual funds of other companies based upon management's judgment as to the ultimate collectability. The Company also reserves for its unsecured client activity funded by its affiliate, AEIS. The Company has agreed to indemnify AEIS for any losses that it may sustain from the customer accounts introduced by the Company. The Company reserves for these potential losses.

When determining the allowance for credit losses for advisor loans, the Company considers its actual historical collection experience and advisor termination experience as well as other factors including amounts due at termination, the reasons for the terminated relationship, length of time since termination, and the former financial advisor's overall financial position. Management uses its best estimate of future termination and collection rates to estimate expected credit losses over the expected life of the loans. The allowance for credit losses on advisor loans is recorded as prepaid commissions.

*Goodwill and intangible assets:* Goodwill represents the amount of an acquired company's acquisition cost in excess of the fair value of assets acquired and liabilities assumed. The Company evaluates goodwill for impairment annually on the measurement date of July 1 and whenever events and circumstances indicate that an impairment may have occurred, such as a significant adverse change in the business climate or a decision to sell or dispose of a reporting unit. Impairment is the amount that the carrying value exceeds fair value and is evaluated at the reporting unit level. The Company assesses various qualitative factors to determine whether impairment is likely to have occurred. If impairment were to occur, the Company would use the discounted cash flow method, a variation of the income approach.

Intangible assets generally represent customer and independent contractor relationships and non-compete agreements. Intangible assets are amortized over their estimated useful lives unless they are deemed to have indefinite useful lives. The Company evaluates the definite lived intangible assets remaining useful lives annually and tests for impairment whenever events and circumstances indicate that an impairment may have occurred, such as a significant adverse change in the business climate. For definite lived intangible assets, impairment to fair value is recognized if the carrying amount is not recoverable. Indefinite lived intangibles are also tested for impairment annually or whenever circumstances indicate an impairment may have occurred.

*Prepaid commissions:* Commissions paid by the Company to advisors in connection with the sales of financial plans are deferred until the plan is delivered and the corresponding revenue is recognized.

Ameriprise Financial Services, LLC  
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**2. Recent Accounting Pronouncements**

**Adoption of New Accounting Standards**

*Reference Rate Reform – Deferral of the Sunset Date of Topic 848*

In December 2022, the Financial Accounting Standards Board (“FASB”) issued Accounting Standards Update (“ASU”) 2022-06, *Reference Rate Reform* (“Topic 848”): *Deferral of the Sunset Date of Topic 848*. The guidance in Topic 848 is expected to provide relief during the temporary transition period, so FASB included a sunset provision within Topic 848 based on expectations of when the London Interbank Offered Rate (“LIBOR”) would cease being published. To ensure the relief in Topic 848 covers the period during which a significant number of modifications may take place, the ASU defers the sunset date of Topic 848 from December 31, 2022 to December 31, 2024, after which entities will no longer be permitted to apply the relief in Topic 848. The adoption of the standard did not have an impact on the Company’s financial condition.

*Financial Instruments – Credit Losses – Troubled Debt Restructurings and Vintage Disclosures*

In March 2022, the FASB proposed amendments to ASU 2016-13, *Financial Instruments—Credit Losses: Measurement of Credit Losses on Financial Instruments* (“Topic 326”). The update removes the recognition and measurement guidance for Troubled Debt Restructurings (“TDRs”) by creditors in Subtopic 310-40, *Receivables—Troubled Debt Restructurings by Creditors*, and modifies the disclosure requirements for certain loan refinancing and restructuring by creditors when a borrower is experiencing financial difficulty. Rather than applying the recognition and measurement for TDRs, an entity must apply the loan refinancing and restructuring guidance to determine whether a modification results in a new loan or a continuation of an existing loan. The update also requires entities to disclose current-period gross write-offs by year of origination for financing receivables and net investments in leases within the scope of Subtopic 326-20, *Financial Instruments—Credit Losses—Measured at Amortized Cost*. The amendments are to be applied prospectively, but entities may apply a modified retrospective transition for changes to the recognition and measurement of TDRs. For entities that have adopted Topic 326, the amendments are effective for interim and annual periods beginning after December 15, 2022. Early adoption is permitted for entities that have adopted Topic 326, including adoption in an interim period. The Company adopted the standard on January 1, 2023. The adoption of this update did not have a material impact on the Company’s financial condition.

*Income Taxes—Simplifying the accounting for income taxes.*

In December 2019, the Financial Accounting Standards Board (FASB) updated the accounting standards to simplify the accounting for income taxes. The update amends existing guidance related to the allocation of income tax expense when members of a tax filing group issue separate financial statements. The updated guidance is applied on a retrospective basis for all periods presented. The standard is effective for interim and annual periods beginning after December 15, 2020, with early adoption permitted.

The Company early adopted the updated guidance effective January 1, 2020. The Company was impacted by the conversion to a limited liability company in 2020, the adoption of the updated guidance and its election to not be allocated income tax expense as the Company is a member of a tax filing group. Under the updated guidance, income tax expense, income tax receivables, payables, and deferred tax assets and liabilities are no longer recognized in the financial statements of the Company. As a result, the Company recorded a \$132 million reduction in deferred income tax assets, a \$9 million reduction in uncertain tax positions which were recorded in other liabilities and a \$123 million reduction in retained earnings as of January 1, 2020.

The standard also updated the guidance for intra period tax allocation, deferred tax liabilities related to outside basis differences, step-up in the tax basis of goodwill, interim recognition of enactment of tax laws or rate changes and franchise taxes and other taxes. None of these updates had an impact on the Company’s financial condition.

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*Intangibles – Goodwill and Other – Simplifying the Test for Goodwill Impairment*

In January 2017, the FASB updated the accounting standards to simplify the accounting for goodwill impairment. The update removes the hypothetical purchase price allocation (Step 2) of the goodwill impairment test. Goodwill impairment will now be the amount by which a reporting unit's carrying value exceeds its fair value. The standard is effective for interim and annual periods beginning after December 15, 2019 and should be applied prospectively with early adoption permitted for any impairment tests performed after January 1, 2017. The Company adopted the standard on January 1, 2020. The adoption of this update did not have a material impact on the Company's financial condition.

**3. Goodwill and Other Intangibles**

Goodwill is not amortized but is instead subject to impairment tests. During the year ended December 31, 2022, the tests did not indicate impairment.

Definite lived intangible assets acquired for the year ended December 31, 2022, represent the acquisition of advisor and customer relationships were \$35,247, with a weighted average amortization period of five years. For the year ended December 31, 2022, the impairment tests on definite lived intangible assets did not indicate impairment.

Definite lived intangible assets consisted of the following:

	Gross Carrying Amount	Accumulated Amortization	Net Carrying Amount
Customer and advisor relationships	\$ 162,055	\$ 117,334	\$ 44,721
Tax referral agreement	10,200	9,875	325
Non-compete agreements	43,899	16,056	27,843
December 31, 2022 balance	<u>\$ 216,154</u>	<u>\$ 143,265</u>	<u>\$ 72,889</u>

**4. Business Owned Life Insurance**

The Company holds cash value life insurance policies as a means of offsetting market fluctuations in certain deferred compensation liabilities. As of December 31, 2022, the cash surrender value, which approximates fair value, of this life insurance was \$26,411 and is included in the other assets line in the statements of financial condition.

**5. Secured Demand Note Receivable and Subordinated Liabilities**

In December 2014, a subordinated loan agreement in the form of a secured demand note was entered into with the Parent.

The borrowing available under the subordination agreement on December 31, 2022, is as follows:

Secured demand note collateral agreement, 0.10 percent, due December 15, 2023	<u>\$200,000</u>
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The subordinated borrowing with the Parent is available in computing net capital under the SEC's uniform net capital rule. Under the terms of the subordinated loan agreement, to the extent that such borrowings are required for the Company's continued compliance with minimum net capital requirements, the Company is prohibited from making payments on the subordinated note agreement. The Company has the option to renew the current agreement in one-year increments in perpetuity. Pursuant to the agreement, the Parent must notify the Company on or before the day thirteen months preceding the maturity date if they do not intend to extend the maturity date of the agreement. The Company and the Parent have elected to not terminate the agreement for fiscal year 2023.

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On December 31, 2022, the secured demand note was collateralized by securities with an aggregate fair value of \$234,006. Based on the character and fair value of the securities collateralizing the secured demand note receivable, the entire \$200,000 is available in computing net capital in accordance with the SEC's uniform net capital rule. The securities collateral has been deposited by the Parent in a separate custodial account for the exclusive benefit of the Company. In the event the Company draws on the secured demand note receivable, the maximum payment to the Company in accordance with the terms of the collateral agreement is \$200,000 and the stated interest rate adjusts from a standing ten basis points to LIBOR plus 90 basis points. The subordinated loan agreement and the associated secured demand note agreement entered with the Parent was approved by FINRA prior to the respective effective dates.

#### **6. Fair Values of Assets and Liabilities**

U.S. GAAP defines fair value as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date; that is, an exit price. The exit price assumes the asset or liability is not exchanged subject to a forced liquidation or distressed sale.

#### **Valuation Hierarchy**

The Company categorizes its fair value measurements according to a three-level hierarchy. The hierarchy prioritizes the inputs used by the Company's valuation techniques. A level is assigned to each fair value measurement based on the lowest level input that is significant to the fair value measurement in its entirety. The three levels of the fair value hierarchy are defined as follows:

- |         |  |
|---------|--|
| Level 1 | Unadjusted quoted prices for identical assets or liabilities in active markets that are accessible at the measurement date.      |
| Level 2 | Prices or valuations based on observable inputs other than quoted prices in active markets for identical assets and liabilities. |
| Level 3 | Prices or valuations that require inputs that are both significant to the fair value measurement and unobservable.               |

#### **Determination of Fair Value**

The Company uses valuation techniques consistent with the market and income approaches to measure the fair value of its assets and liabilities. The Company's market approach uses prices and other relevant information generated by market transactions involving identical or comparable assets or liabilities. The Company's income approach uses valuation techniques to convert future projected cash flows to a single discounted present value amount. When applying either approach, the Company maximizes the use of observable inputs and minimizes the use of unobservable inputs. The following is a description of the valuation techniques used to measure fair value and the general classification of these instruments pursuant to the fair value hierarchy.

#### *Cash Equivalents, Other Assets and Liabilities*

When available, the fair value of securities is based on quoted prices in active markets. If quoted prices are not available, fair values are obtained from third party pricing services, non-binding broker quotes, or other model-based valuation techniques. The Company's cash equivalents, consisting of commercial paper and time deposits, are classified as Level 2 and are measured at amortized cost, which approximates fair value because of the short time between the purchase of the instrument and its expected realization. Level 1 other assets consist of common stock and government treasury bills and notes. Level 2 other assets consist of unitary investment trusts (UIT's), municipal bonds and limited market securities.

Level 2 liabilities consist of UIT's, non-convertible debt securities, municipal bonds, government securities and agencies and limited market securities. Level 3 contingent consideration liabilities consist of earn outs and/or deferred payments related to the Company's acquisitions. Contingent consideration liabilities are recorded at fair value utilizing a discounted cash flow model using an unobservable input (discount rate). Given the use of a significant unobservable input, the fair value of contingent consideration liabilities is classified as Level 3 within the fair value hierarchy.

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The following table presents balances of assets and liabilities measured at fair value on a recurring basis:

	December 31, 2022			
	Level 1	Level 2	Level 3	Total
<b>Assets</b>				
Cash equivalents				
Commercial paper	\$ —	\$ 648,554	\$ —	\$ 648,554
Time deposits	—	25,000	—	25,000
Other assets	469	783	—	1,252
Total assets at fair value	<u>\$ 469</u>	<u>\$ 674,337</u>	<u>\$ —</u>	<u>\$ 674,806</u>
<b>Liabilities</b>				
Contingent consideration liability	\$ —	\$ —	\$ 42,457	\$ 42,457
Other liabilities	—	21	—	21
Total liabilities at fair value	<u>\$ —</u>	<u>\$ 21</u>	<u>\$ 42,457</u>	<u>\$ 42,478</u>

During the reporting period, there were no material assets or liabilities measured at fair value on a nonrecurring basis.

There were no transfers between levels during the periods.

The following table provides a summary of changes in Level 3 liabilities measured at fair value on a recurring basis:

	Contingent consideration liability
Balance at January 1, 2022	\$ 33,606
Accretion included in earnings	(2,000)
Issuances	11,092
Settlements	(241)
Valuation adjustments including earnings	-
Balance at December 31, 2022	<u>\$ 42,457</u>

#### Fair Value of Financial Instruments

In general, the Company's financial assets and liabilities are carried at fair value or at amounts which, because of their short-term nature and based on market interest rates available to the Company on December 31, 2022, approximate fair value.

Included in receivables from financial advisors and employees on the statements of financial condition are loans receivable from financial advisors. As of December 31, 2022, the carrying value of the loans is \$1,887, which approximates fair value. These receivables, not included in the table above, are considered a level 3 fair value.

As of December 31, 2022, the fair value of the secured demand notes receivable and the subordinated liability approximate book value of \$200,000. This receivable and liability, not included in the table above, are both considered level 2 fair value. As of December 31, 2022, the secured demand note collateral consisted of corporate bonds and agency mortgage-backed securities and is considered level 2 fair value.

#### 7. Net Capital Provision and Regulatory Requirements

As a registered broker dealer, the Company is subject to the SEC's uniform net capital rule (SEA Rule 15c3-1).

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The Company computes its net capital requirements under the alternative method provided for in SEA Rule 15c3-1, which requires the Company to maintain net capital equal to 2% of combined aggregate customer-related debit items, as defined (or \$250, if greater).

On December 31, 2022, the Company had net capital of \$89,891 which was \$89,641 more than the amount required to be maintained at those dates. Advances to affiliates, dividend payments and other equity withdrawals are subject to certain notification and other provisions of the net capital rule of the SEC and other regulatory bodies.

The Company has claimed exemption from SEA Rule 15c3-3 of the SEC under paragraphs (k)(2)(i) and (k)(2)(ii) of that rule.

#### **8. Commitments and Contingencies**

In the normal course of business, the Company may indemnify and guarantee certain service providers against potential losses in connection with their acting as service providers to the Company. The maximum potential amount of future payments the Company could be required to make under these indemnifications cannot be estimated, however, the Company believes that it is unlikely it will have to make material payments under these arrangements and has not recorded a contingent liability in the financial statements for any indemnifications.

The Company has agreed to indemnify an affiliate, AEIS, for any losses that it may sustain from the customer accounts introduced by the Company. The Company reserves for these potential losses. On December 31, 2022, the reserve was \$3,250, and is reflected in the other liabilities line in the statements of financial condition. On December 31, 2022, there were no amounts indemnified to AEIS for these customer accounts.

The Company is involved in the normal course of business in legal, regulatory and arbitration proceedings, including class actions, concerning matters arising in connection with the conduct of its activities as a diversified financial services firm. These include proceedings specific to the Company as well as proceedings generally applicable to business practices in the industries in which it operates. The Company can also be subject to litigation arising out of its general business activities, such as its investments, contracts, leases, and employment relationships. Uncertain economic conditions heightened and sustained volatility in the financial markets and significant financial reform legislation may increase the likelihood that clients and other persons or regulators may present or threaten legal claims or that regulators increase the scope or frequency of examinations of the Company or the financial services industry generally.

As with other financial services firms, the level of regulatory activity and inquiry concerning the Company's businesses remains elevated. From time to time, the Company receives requests for information from, and/or has been subject to examination or claims by, the SEC, FINRA, state insurance and securities regulators, state attorneys general and various other governmental and quasi-governmental authorities on behalf of themselves or clients concerning the Company's business activities and practices, and the practices of the Company's financial advisors. The Company has numerous pending matters which include information requests, exams or inquiries that the Company has received during recent periods regarding certain matters, including: sales and distribution of mutual funds, exchange traded funds, annuities, equity and fixed income securities, real estate investment trusts, insurance products, and financial advice offerings, including managed accounts; supervision of the Company's financial advisors; security of client information; and transaction monitoring systems and controls. The Company has cooperated and will continue to cooperate with the applicable regulators.

These legal and regulatory proceedings and disputes are subject to uncertainties and, as such, it is inherently difficult to determine whether any loss is probable or even reasonably possible, or to reasonably estimate the amount of any loss. The Company cannot predict with certainty if, how or when any such proceedings will be initiated or resolved or what the eventual settlement, fine, penalty or other relief, if any, may be, particularly for proceedings that are in their early stages of development or where plaintiffs seek indeterminate damages. Numerous issues may need to be resolved, including through potentially lengthy discovery and determination of important factual matters, and by addressing unsettled legal questions relevant to the proceedings in question, before a loss or range of loss can be reasonably estimated for any proceeding. An adverse outcome in one or more proceeding could eventually result in adverse judgments, settlements, fines, penalties, or other sanctions, in addition to further claims, examinations or adverse publicity that could have a material adverse effect on the Company's financial condition.

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In accordance with applicable accounting standards, the Company establishes an accrued liability for contingent litigation and regulatory matters when those matters present loss contingencies that are both probable and can be reasonably estimated. In such cases, there still may be an exposure to loss more than reasonably estimated amounts and accrued. When a loss contingency is not both probable and estimable, the Company does not establish an accrued liability, but continues to monitor, in conjunction with any outside counsel handling a matter, further developments that would make such loss contingency both probable and reasonably estimable. Once the Company establishes an accrued liability with respect to a loss contingency, the Company continues to monitor the matter for further developments that could affect the amount of the accrued liability that has been previously established, and any appropriate adjustments are made each quarter.

#### **9. Income Taxes**

Effective January 1, 2020, the Company adopted guidance simplifying the accounting for income taxes. As a result of the adoption and the Company's conversion to a limited liability company in 2020 which resulted in it becoming a disregarded entity, income taxes expense, income tax receivables and payables, and deferred tax assets and liabilities are no longer recognized in the financial statements for the Company. See Note 1 and 2.

The Company files income tax returns, as part of its inclusion in the consolidated federal income tax return of Ameriprise Financial (the Parent), in the U.S. federal jurisdiction and various state jurisdictions. The federal statute of limitation is closed on years through 2015, except for one issue for 2014 and 2015 which was claimed on amended returns. The IRS is currently auditing the Parent's U.S. income tax returns for 2016 through 2020. Ameriprise Financial or its subsidiaries', including the Company's state tax returns are currently under examination by various jurisdictions for years ranging from 2015 through 2020.

#### **10. Related Party Transactions**

The Company has a short-term intercompany lease agreement with an affiliate, Ameriprise Holdings, Inc. (AHI). The agreement has a one-year term with no contractual renewal provision and is cancelable by either party with 30 days' notice. The Company compensates AHI for the use of property, equipment, and similar items that AHI owns or maintains. No lease asset or liability is recorded on the statement of financial condition.

Receivables due from affiliates on the statements of financial condition primarily consist of distribution fees of \$60,366, trading concessions of \$9,843, marketing support fees of \$6,389, and an insurance recoverable of \$17,200, on December 31, 2022.

Payables due to affiliates on the statements of financial condition primarily consist of administrative expenses of \$97,521, use of property and equipment maintenance for \$5,633, cash for affiliated product purchases of \$31,727 due to various affiliates for investments in products and clearing charges for \$9,714 on December 31, 2022.

The Company clears most transactions with AEIS, which charges the Company clearing fees on a per trade basis or on assets under management on a per trade basis.

The Company participates in the Parent's Retirement Plan (the Plan), which covers all permanent employees aged 21 and over who have met certain employment requirements. Effective April 2020, the Parent no longer enrolled employees in the plan. The Plan includes a cash balance formula and a lump sum distribution option. Pension benefit contributions to the Plan are based on participants' age, years of service and total compensation for the year. Funding of retirement costs for the Plan complies with the applicable minimum funding requirements specified by the Employee Retirement Income Security Act (ERISA).

The Company participates in defined contribution pension plans of the Parent that cover all employees who have met certain employment requirements. The Company's contributions to the plans are a percentage of either each employee's eligible compensation or basic contributions.

The Company participates in the Parent's Advisor Group Deferral Plan, which was created in April 2009, which allows for employee advisors to receive share-based bonus awards which are subject to future service requirements and forfeitures.



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The Advisor Group Deferral Plan is an unfunded non-qualified deferred compensation plan under section 409A of the Internal Revenue Code. The Advisor Group Deferral Plan also gives qualifying employee advisors the choice to defer a portion of their base salary or commissions beginning in 2010. This deferral can be in the form of share-based awards or other investment options. Deferrals are not subject to future service requirements or forfeitures. Awards granted under the Advisor Group Deferral Plan may be settled in cash and/or shares of the Parent's common stock according to the award's terms.

The Company participates in the Parent's Incentive Compensation Plan (Incentive Plan) and the Parent's Deferred Equity Program for Independent Financial Advisors (Deferred Equity Program). Employees, directors, and independent contractors are eligible to receive incentive awards including stock options, restricted stock awards, restricted stock units, performance shares and similar awards designed to comply with the applicable federal regulations and laws of various jurisdictions.

The Parent's Incentive Compensation Plan primarily grants restricted stock awards and stock units that generally vest ratably over three to four years to the Company's employees. Vesting of restricted awards and units may be accelerated based on age and length of service. Compensation expense for restricted stock awards is based on the market price of the Parent's stock on the date of grant and is amortized on a straight-line basis over the vesting period. Quarterly dividends are paid on restricted stock and stock units during the vesting period and are not subject to forfeiture. A summary of the Company's restricted stock award and stock unit activity is presented below:

	2022	
	Shares	Weighted Average Grant-date Fair Value per Share
Non-vested shares at January 1	70	\$171.73
Granted	26	\$298.09
Vested	(47)	\$183.67
Forfeited	(2)	\$223.29
Non-vested shares at December 31	<u>47</u>	<u>\$226.32</u>

As of December 31, 2022, there were approximately 1087 units outstanding under the Advisor Group Deferral Plan, of which 202 were fully vested.

Effective October 2011, the Company entered into two separate revolving credit agreements with the Parent, each with an interest rate of LIBOR plus 90 basis points, whereby in one the Company can borrow up to \$100,000 from the Parent and in the second the Parent can borrow up to \$100,000 from the Company. As of December 31, 2022, and for the year ended, there were no draws on these lines of credit.

The Agreement shall remain in effect until the expiration date (October 19<sup>th</sup> of each year), which shall be automatically extended without amendment of the Agreement for one year, or any date annually thereafter. Either party may terminate this Agreement prior to the expiration date by providing written notice to the other party at least thirty (30) days prior to the expiration date. The agreement was in place for all of 2022 and was renewed for 2023.

Effective December 2014, the Company and the Parent entered a secured demand note collateral and subordinated loan agreement for \$200,000 at a stated interest rate of 0.10% due to mature on December 15, 2023, with the option to renew in one-year increments in perpetuity.

The Company paid dividends to the parent of \$905,000 in 2022.



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**11. Subsequent Events**

As of February 23, 2023, which is the date the financial statements were available to be issued, the Company evaluated events or transactions that may have occurred after the balance sheet date for potential recognition or disclosure. On February 15th, 2023 a dividend of \$30,000 was paid to AMF Holding Corp. No other subsequent events or transactions requiring recognition or disclosure were identified.

# Form ADV: Brochure Supplement

December 2022

This brochure supplement provides information about Gregory G Carr, who is a member of the *Ameriprise* Premier Retirement Income Oversight Committee for Ameriprise Financial Services, LLC. This information supplements the Ameriprise Financial Services, LLC client disclosure brochure. You received a copy of that brochure when you enrolled in the Service. Please contact Ameriprise Financial Services, LLC at 800.862.7919 if you would like another copy of the client disclosure brochure or if you have any questions about the contents of this supplement.

## Gregory G Carr

Ameriprise Financial Services, LLC  
11057 Ameriprise Financial Center  
Minneapolis, MN 55474

800.834.8959

## Company Address

Ameriprise Financial Services, LLC  
707 South 2nd Avenue  
Minneapolis, MN 55474

800.862.7919

## Educational, Background and Business Experience

**Year of birth:** 1968

**High school graduate:** Yes

**Level of post secondary education:** BA, Rider University 1990; MBA, Rider University, 1991

## Business Experience:

- Senior Vice President, General Manager – Wealth, Trading and Product Solutions
- In addition to his participation on the *Ameriprise* Premier Retirement Income Oversight Committee, Mr. Carr is Senior Vice President, General Manager – Wealth, Trading and Product Solutions where his responsibilities include leadership over wealth solutions geared toward HNW clients and prospects, the *Ameriprise* Premier Retirement Income service, brokerage and advisory trading, and product management for mutual funds, 529s, alternatives, structured products, fixed income, equities, ETFs, options and unit investment trusts. Mr. Carr has been with the firm since 2011. Prior to joining Ameriprise, Mr. Carr was Executive Vice President at First Trust Portfolios/BondWave, and Vice President at A.G. Edwards & Sons, Inc.

## Disciplinary Action

There are no legal and/or disciplinary events to report for this individual.

Additional information about this person is available at [brokercheck.finra.org](http://brokercheck.finra.org).

## Other Business Activities

There are no outside business activities to report.

## Additional Compensation

Product companies (including our affiliates) with which we have agreements work with Ameriprise Financial Services, LLC and our financial advisors to provide education and other support to help distribute their products. These companies may pay for training and education events, seminars or other similar events for employees, financial advisors, clients and prospective clients. They may also reimburse expenses for due diligence meetings or occasionally provide business or recreational entertainment. Some companies also may compensate the financial advisor a service fee. These service fees, as well as incentive programs and cash and/or noncash compensation, all are strictly regulated by the SEC and Financial Industry Regulatory Authority, as well as Ameriprise Financial Services, LLC internal compliance policies.

## Supervision

*Ameriprise* Premier Retirement Income Oversight Committee (the “Committee”), provides oversight for Service, including the methods of analysis and investment strategies utilized by the Service team to provide recommendations to clients. The advisory activities of the Committee are supervised by Sandra Bolton, Executive Vice President, Wealth Management Products & Solutions for Ameriprise Financial Services, LLC.

**Supervisor:** Sandra Bolton

**Title:** Executive Vice President, Wealth Management Products & Solutions

**Phone Number:** 800.834.8959

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## Form ADV: Brochure Supplement

December 2022

This brochure supplement provides information about Marcy Keckler, who is a member of the *Ameriprise* Premier Retirement Income Oversight Committee for Ameriprise Financial Services, LLC. This information supplements the Ameriprise Financial Services, LLC client disclosure brochure. You received a copy of that brochure when you enrolled in the Service. Please contact Ameriprise Financial Services, LLC at 800.862.7919 if you would like another copy of the client disclosure brochure or if you have any questions about the contents of this supplement.

Marcy Keckler

Ameriprise Financial Services, LLC  
1242 Ameriprise Financial Center  
Minneapolis, MN 55474  
800.834.8959

Company Address

Ameriprise Financial Services, LLC  
707 South 2nd Avenue  
Minneapolis, MN 55474  
800.862.7919

## Educational, Background and Business Experience

**Year of birth:** 1968

**High school graduate:** Yes

**Level of post secondary education:** BA, Georgetown University, 1991; Certified Financial Planner (CFP®) certificant, 2008; Chartered Retirement Planning Counselor (CRPC®), 2012; Retirement Income Certified Professional (RICP®), 2020

## Business Experience:

- Senior Vice President – Marketing & Financial Advice Strategy
- In addition to her participation on the *Ameriprise* Premier Retirement Income Oversight Committee, Ms. Keckler is Senior Vice President of Marketing and Financial Advice Strategy. She leads the overall strategy for financial advice at Ameriprise. She is also responsible for client experience, client acquisition, client retention, field engagement and marketing programs. Ms. Keckler has been with the firm since 1996.

## Disciplinary Action

There are no legal and/or disciplinary events to report for this individual.

Additional information about this person is available at [brokercheck.finra.org](http://brokercheck.finra.org).

## Other Business Activities

There are no outside business activities to report.

## Additional Compensation

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## Supervision

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**Supervisor:** Sandra Bolton

**Title:** Executive Vice President, Wealth Management Products & Solutions

**Phone Number:** 800.834.8959

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## Form ADV: Brochure Supplement

December 2022

This brochure supplement provides information about Mike Greene, who is a member of the *Ameriprise* Premier Retirement Income Oversight Committee for Ameriprise Financial Services, LLC. This information supplements the Ameriprise Financial Services, LLC client disclosure brochure. You received a copy of that brochure when you enrolled in the Service. Please contact Ameriprise Financial Services, LLC at 800.862.7919 if you would like another copy of the client disclosure brochure or if you have any questions about the contents of this supplement.

Mike Greene

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Minneapolis, MN 55474  
800.834.8959

Company Address

Ameriprise Financial Services, LLC  
707 South 2nd Avenue  
Minneapolis, MN 55474  
800.862.7919

## Educational, Background and Business Experience

**Year of birth:** 1966

**High school graduate:** Yes

**Level of post secondary education:** BS, United State Military Academy, 1989; MS, London School of Economics 1991

## Business Experience:

- Senior Vice President – Advisor Business Development
- In addition to his participation on the *Ameriprise* Premier Retirement Income Oversight Committee, Mr. Greene is responsible for the financial planning advice business at Ameriprise. He also leads field training and the Advisor Business Development group who coach advisors on client acquisition, the advice business and net flows. Greene has held roles in Compliance, franchise management and advice. Greene has CFP, series 7 & 24. He has been with Ameriprise since 2002.

## Disciplinary Action

There are no legal and/or disciplinary events to report for this individual.

Additional information about this person is available at [brokercheck.finra.org](http://brokercheck.finra.org).

## Other Business Activities

There are no outside business activities to report.

## Additional Compensation

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## Supervision

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**Supervisor:** Sandra Bolton

**Title:** Executive Vice President, Wealth Management Products & Solutions

**Phone Number:** 800.834.8959

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## Form ADV: Brochure Supplement

December 2022

This brochure supplement provides information about Pete Sirbu, who is a member of the *Ameriprise* Premier Retirement Income Oversight Committee for Ameriprise Financial Services, LLC. This information supplements the Ameriprise Financial Services, LLC client disclosure brochure. You received a copy of that brochure when you enrolled in the Service. Please contact Ameriprise Financial Services, LLC at 800.862.7919 if you would like another copy of the client disclosure brochure or if you have any questions about the contents of this supplement.

Pete Sirbu

Ameriprise Financial Services, LLC  
901 3<sup>rd</sup> Ave South  
Minneapolis, MN 55474  
800.834.8959

Company Address

Ameriprise Financial Services, LLC  
707 South 2nd Avenue  
Minneapolis, MN 55474  
800.862.7919

## Educational, Background and Business Experience

**Year of birth:** 1971

**High school graduate:** Yes

**Level of post secondary education:** BA, Colorado State University - Economics

## Business Experience:

- Vice President – Fixed Income Trading & Strategies, Wealth Consulting Services, and *Ameriprise* Premier Retirement Income
- In addition to his participation on the *Ameriprise* Premier Retirement Income Oversight Committee, Mr. Sirbu is Vice President of Fixed Income Trading & Strategies, Wealth Consulting Services, and Premier Retirement Income Operations and Consulting Desk where his responsibilities include oversight for all broker dealer fixed income trading and fixed income portfolio/proposal development, option hedging strategies, home office comprehensive financial planning and investment strategy for HNW prospects and clients, and the *Ameriprise* Premier Retirement Income operations and consulting teams. Mr. Sirbu was Vice President at RBC, Piper Sandler (Jaffray), and Key Clearing Corp (McDonald & Company) where his responsibilities included institutional and retail convertible arbitrage trading and oversight of equities/ options trading, credit, margin, risk, account transfers, cashless stock options and collateral loans. Mr. Sirbu has been with the firm since 2010.

## Disciplinary Action

There are no legal and/or disciplinary events to report for this individual.

Additional information about this person is available at [brokercheck.finra.org](http://brokercheck.finra.org).

## Other Business Activities

There are no outside business activities to report.

## Additional Compensation

Product companies (including our affiliates) with which we have agreements work with Ameriprise Financial Services, LLC and our financial advisors to provide education and other support to help distribute their products. These companies may pay for training and education events, seminars or other similar events for employees, financial advisors, clients and prospective clients. They may also reimburse expenses for due diligence meetings or occasionally provide business or recreational entertainment. Some companies also may compensate the financial advisor a service fee. These service fees, as well as incentive programs and cash and/or noncash compensation, all are strictly regulated by the SEC and Financial Industry Regulatory Authority, as well as Ameriprise Financial Services, LLC internal compliance policies.

## Supervision

*Ameriprise* Premier Retirement Income Oversight Committee (the “Committee”), provides oversight for Service, including the methods of analysis and investment strategies utilized by the Service team to provide

recommendations to clients. The advisory activities of the Committee are supervised by Sandra Bolton, Executive Vice President, Wealth Management Products & Solutions for Ameriprise Financial Services, LLC.

**Supervisor:** Sandra Bolton

**Title:** Executive Vice President, Wealth Management Products & Solutions

**Phone Number:** 800.834.8959

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## Form ADV: Brochure Supplement

December 2022

This brochure supplement provides information about Lyle Schonberger who is a member of the *Ameriprise* Premier Retirement Income Oversight Committee for Ameriprise Financial Services, LLC. This information supplements the Ameriprise Financial Services, LLC client disclosure brochure. You received a copy of that brochure when you enrolled in the Service. Please contact Ameriprise Financial Services, LLC at 800.862.7919 if you would like another copy of the client disclosure brochure or if you have any questions about the contents of this supplement.

Lyle Schonberger

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1441 W. Long Lake Drive, Suite 250  
Troy, MI 48098

800.834.8959

Company Address

Ameriprise Financial Services, LLC  
707 South 2nd Avenue  
Minneapolis, MN 55474

800.862.7919

## Educational, Background and Business Experience

**Year of birth:** 1969

**High school graduate:** Yes

**Level of post secondary education:** B.A., Business, Austin College, 1991; Dual M.B.A., Finance and International Business, Drexel University, 1993.

## Business Experience:

- Vice President – Wealth Management Solutions, Investment Research
- In addition to his participation on the *Ameriprise* Premier Retirement Income Oversight Committee, Mr. Schonberger is Vice President of Investment Research and Due Diligence at Ameriprise Financial. He leads proprietary macro and securities research, manager research, and investment due diligence. Mr. Schonberger oversees the creation, dissemination and functionality of the entire suite of proprietary research publications and support materials, with a steadfast focus on independence and objectivity. He is also responsible for strategic planning and department budgeting, and general department regulatory, supervisory and management responsibilities.

Mr. Schonberger joined Ameriprise in 1994 as a health care analyst covering pharmaceuticals, biotechnology, medical supplies and devices, and the health care services industries. He later added coverage of select industrial and consumer brand companies. Mr. Schonberger took over as research director in 2000 and has held roles of increasing span and leadership responsibility, all within the Ameriprise proprietary research function. Mr. Schonberger holds the Series 7, 16, 24, 31, 63, 65, 86, and 87 securities licenses.

## Disciplinary Action

There are no legal and/or disciplinary events to report for this individual.

Additional information about this person is available at [brokercheck.finra.org](http://brokercheck.finra.org).

## Other Business Activities

There are no outside business activities to report.

## Additional Compensation

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## Supervision

*Ameriprise Premier Retirement Income Oversight Committee* (the “Committee”), provides oversight for Service, including the methods of analysis and investment strategies utilized by the Service team to provide recommendations to clients. The advisory activities of the Committee are supervised by Sandra Bolton, Executive Vice President, Wealth Management Products & Solutions for Ameriprise Financial Services, LLC.

**Supervisor:** Sandra Bolton

**Title:** Executive Vice President, Wealth Management Products & Solutions

**Phone Number:** 800.834.8959

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# Glossary

- **“ABISA”** means Ameriprise Bank Insured Sweep Account.
- **“Advisers Act”** means the Investment Advisers Act of 1940, as amended.
- **“AEIS”** means American Enterprise Investment Services Inc.
- **“AFIG”** means Ameriprise Financial Institutions Group.
- **“AIMMA”** means Ameriprise Insured Money Market Account, an interest-bearing multi-bank deposit product.
- **“Ameriprise”** means Ameriprise Financial, Inc.
- **“Ameriprise Financial Services”, “Ameriprise Financial”, “AFSI”, “we”, “us” or “our”** means Ameriprise Financial Services, LLC.
- **“ATC”** means Ameriprise Trust Company.
- **“Available for Sale Firms”** are firms that sponsor or manage mutual fund options to whom IRG will proceed to look for if a suitable mutual fund recommendation for a particular asset class cannot be found within the Full Participation Firms’ offerings.
- **“Bank”** means Ameriprise Bank, FSB.
- **“Brochure” or “Disclosure Brochure”** means *Ameriprise Premier Retirement Income Client Disclosure Brochure*.
- **“CD”** means a Certificate of Deposit.
- **“CFTC”** means the Commodity Futures Trading Commission.
- **“CMIA” or “Columbia Management Investment Advisers”** means Columbia Management Investment Advisers, LLC.
- **“Columbia” or “Columbia Management”** refers, collectively, to Columbia Management Investment Advisers, LLC and Columbia Wanger Asset Management, LLC.
- **“Columbia Funds”** means investment companies and other funds advised by affiliated companies, Columbia Management Investment Advisers, LLC and Columbia Wanger Asset Management, LLC.
- **CTA** means Commodity Trading Advisor.
- **“Effective Date”** means the effective date of the Service Agreement.
- **“Engagement Period”** means each applicable twelve-month period for the Service.
- **“ERISA”** means the Employee Retirement Income Security Act of 1974, as amended.
- **“FASB”** means the Financial Accounting Standards Board.
- **“FDIC”** means the Federal Deposit Insurance Corporation.
- **“FINRA”** means the Financial Industry Regulatory Authority.
- **“Full Participation Firms”** are mutual fund firms that fully participate in the Mutual Fund Program.
- **“Internal Revenue Code”** means the Internal Revenue Code of 1986, as amended.
- **“IRA”** means an individual retirement account.
- **“IRG”** means Ameriprise Investment Research Group.
- **“Managed Account”** means an Ameriprise investment advisory account for which you pay an ongoing asset-based Wrap Fee.
- **“Mutual Fund Program”** means Ameriprise Financial Mutual Fund Program, the structure formed by the payment of the mutual fund and 529 plan marketing and sales support payments that are received from certain mutual fund firms.
- **“NFA”** means National Futures Association.
- **“NYSE: AMP”** means Ameriprise Financial, Inc. stock symbol on the New York Stock Exchange.

- **“Outside Workplace Retirement Plan”** means additional retirement plan assets held outside of Ameriprise Financial Services in a participant-directed defined contribution plan.
- **“Promoter”** means any individual professional, professional firm, or select corporate, institutional or membership organization that provides testimonials or endorsements of Ameriprise Financial Services for its investment advisory services.
- **“Recommendation Report”** means each written retirement income plan provided to you.
- **“Retirement Portfolio”** means the accounts, assets and income sources you have designated to fund your retirement objectives, e.g., expenses and goals, and which are included for analysis in a Recommendation Report.
- **“RiverSource”** refers, collectively, to RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York.
- **“SEC”** means the United States Securities and Exchange Commission.
- **“SIPC”** means the Securities Investor Protection Corporation.
- **“Service Agreement”** means the *Ameriprise* Premier Retirement Income Agreement, as it may be amended from time to time, that includes the specific terms under which the client will receive the Service.
- **“Service Fee”** means the advisory fee you pay for the Service.
- **“Starting Point List”** means mutual funds and ETF recommended list developed by IRG.
- **“Sweep Program”** means money settlement feature offered by Ameriprise Financial Services that is intended to hold cash.
- **“Third Party Financial Institutions”** means third-party financial institutions such as community banks, credit unions, credit union service organizations and Farm Credit Services with whom Ameriprise Financial Services may form alliances and networking arrangements with to allow its financial advisors to offer financial planning services and certain other non-deposit investment and insurance products and services, to retail customers/members of the Third Party Financial Institutions.
- **“Third Party Payments”** means the portion of investment costs paid to AEIS by third parties who manage, sponsor or distribute investment products held in your Managed Account.

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**This Brochure provides information about the qualifications and business practices of Ameriprise Financial Services, LLC. If you have any questions about the contents of this Brochure, please consult with your financial advisor or contact us at 800.862.7919 between 7 a.m. and 6 p.m. Central time. 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. Ameriprise Financial Services, LLC's California insurance license number is 0684538.**

**Additional information about Ameriprise Financial Services, LLC also is available on the SEC's website at [adviserinfo.sec.gov](https://adviserinfo.sec.gov).**



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Investment advisory services and products are made available through Ameriprise Financial Services, LLC, a registered investment adviser with the SEC. Ameriprise Financial Services, LLC. Member FINRA and SIPC.