

PLAIN LANGUAGE

COMPENSATION & CONFLICTS OF INTEREST DISCLOSURE

The purpose of this document is to disclose all possible conflicts of interest affecting current investments I/we may have with your firm¹ along with a full accounting of all fees/costs that are within my/our investments.

Nature of Services Provided By Advisor And/Or Firm:

- Brokerage/Securities Sales
- Brokerage Wrap Services
- Non-Securities Insurance Sales (i.e., life insurance & annuities)
- Investment Advisor Fee-Only
- Investment Advisor Fee Based with the Sales of Some Brokerage Securities

Fiduciary Role

- Advisor and/or Firm ***always*** acts in a fiduciary role for the client and only offers options and recommendations in the clients' best interest. This would include all products (mutual funds, stocks, variable annuities, etc) plus advisory services.
- Advisor and/or firm ***occasionally*** acts as a fiduciary when providing some services. Please list or explain:

- Advisor and/or Firm ***do not*** operate under a fiduciary duty. As such, our recommendations are not necessarily in the clients' best interests but are instead "suitable" based on their needs.

¹ Firm refers to broker/dealer, Investment Advisory Firm, or any non-affiliated entity that the advisors owns or participates in.

Disclosures:

• **Proprietary Investments (Please check all that apply)**

- My account currently has proprietary products and/or there are special arrangements with cash, money market and stable value accounts.

• **Compensation Disclosure: (Please check all that apply)**

- Advisor and/or firm have been paid commissions on products sold (annuities, life insurance, bonds, stocks, mutual funds, etc) and the full cost is outlined on the next ___ pages.
- Advisor and/or firm have been paid commissions on products sold.
- Advisor and/or firm has/is charging management fees for its services. Please list amounts charged as a percentage and in full dollar amount.
- Advisor and/or firm are revenue neutral, meaning they receive neither more nor less compensation, regardless of the investments selected.
- Advisor and/or firm are NOT revenue neutral. Meaning in the selection of investments to be offered to the client, the advisor and/or firm may earn higher revenues from some investments than from others (such as the case in 12b-1 and revenue sharing fees).
- Comments:

Revenue Sharing & Preferred Products
(sometimes known as “shelf-space”)

- Advisor and/or firm **does not** have any revenue sharing arrangements or preferred products
- Advisor and/or firm **does** receive revenue sharing arrangements and/or offers preferred products. If so:
 - Attached is a full disclosure of all amounts of revenue sharing or preferred products
 - Advisor and/or firm refuse to disclose total revenue sharing fees and/or preferred product compensation.

Soft Dollar Arrangements:

- Advisor and/or firm **does accept** and makes soft dollar arrangements in connection to providing investment services. Please explain:

- Advisor and/or firm **does not** accept or receive any soft dollar payments.

Performance Reporting

- Advisor and/or firm acknowledges that any charts (mountain charts, etc) or performance numbers **do not** contain the effect of sales charges or management fees.
 - Advisor and/or firm **is not able** or **will not** provide my/our performance including all charges and fees.
 - Advisor and/or firm **is** providing my/our performance which includes all charges and fees included in the calculations and it is attached.
- Advisor and/or firm acknowledges that **past performance means absolutely nothing** with regards to future performance or outcomes and should in no way be any means for predicting the future of an investment.

Incentives, Trips, or Bonus Programs:

- Advisor and/or firm **does not** accept any incentives, trips, or bonuses for products recommended.
- Advisor and/or firm **does** accept incentives, trips, and or bonuses for products recommended.
If so, please explain:

Annuity Compensation:

- Advisor and/or firm is paid commissions without breakpoints (discounts) for amounts invested in annuity products.

*For annuities sold to me/us, please list all compensation paid to all levels as a percentage (%) and as a monetary figure (\$) based on our/my investment:

FEES	%	\$
<i>Mortality & Expense Charges</i>		
<i>Mutual Fund Expenses</i>		
<i>Turnover Costs</i>		
<i>Rider Costs (Please list):</i>		
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<i>Any other fees not disclosed above:</i>		

Life Insurance Compensation:

- Advisor and/or firm is paid commissions for amounts invested in Life Insurance products.
- Advisor and/or firm was paid _____ for products sold.

*For Life Insurance sold to me/us, please list all compensation paid to all levels as a percentage (%) and as a monetary figure (\$) based on our/my investment:

FEES	%	\$
<i>Mortality & Expense Charges</i>		
<i>Mutual Fund Expenses</i>		
<i>Turnover Costs</i>		
<i>Rider Costs (Please list):</i>		
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
<i>Any other fees not disclosed above: Such as Sales Charges or Advisor/Firm compensation on the product.</i>		

Mutual Fund Cost Analysis:

The advisor and/or firm acknowledges that they are compensated on your account through the following:

- Sales charge deducted from your account.
 - o Total Sales charge: \$ _____
- Class B Shares compensated by the firm.
 - o Total compensation paid: \$ _____
- Advisory fee.
 - o Percentage & Dollar amounts (please list):

Mutual Fund Cost Analysis (Full Disclosure in Simple Form)

Include additional sheets if needed.

MUTUAL FUND NAME:	Expense Ratio(%)	Expense (\$)

Mutual Fund Turnover Costs:

Since mutual fund turnover (buying & selling) has many hidden costs, please list the following:

MUTUAL FUND NAME	TURNOVER %	\$\$ TURNOVER COST	Tax Implication of Turnover (Amts 1099'd due to T/O)

Our firm agrees that this fully discloses all compensation and/or other charges each party receives for managing the account(s). Our firm acknowledges that any and all compensation arrangements and costs have been fully identified by all parties involved in the account(s).

Signature of Representative or Advisor

Date

Signature of Compliance Officer

Date