FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

	mary Business Name: NEW ENGLA	ND SECURITIES CORPORATION				CRD Number: 615
	nual Amendment - All Sections					Rev. 10/2012
12/2	23/2014 1:20:53 PM					
WA		Illy. False statements or omissions filing periodic amendments. See I			f your registration, or criminal prosec	cution. You must
tem	n 1 Identifying Information					
Res	sponses to this Item tell us who you	ı are, where you are doing busines	ss, and how we can contact yo	u.		
A.	Your full legal name (if you are a s		middle names):			
B.	Name under which you primarily on NEW ENGLAND SECURITIES COR	-	different from Item 1.A.:			
	List on Section 1.B. of Schedule D	any additional names under whic	h you conduct your advisory b	usiness.		
C.	If this filing is reporting a change in ☐ your legal name or ☐ your print		imary business name (Item 1.	B.), enter the new name	e and specify whether the name cha	nge is of
D.	(1) If you are registered with the S(2) If you report to the SEC as an example of the second of t	EC as an investment adviser, your exempt reporting adviser, your SE				
E.	If you have a number ("CRD Numb	ber") assigned by the FINRA's CR	D system or by the IARD syste	m, your <i>CRD</i> number: 6	515	
	If your firm does not have a CRD	number, skip this Item 1.E. Do not	provide the CRD number of o	ne of your officers, emp	oloyees, or affiliates.	
F.	Principal Office and Place of Busin (1) Address (do not use a P.O. Book Number and Street 1: 1095 AVENUE OF THE AMER City: NEW YORK	ox):	Count	er and Street 2: ry: I States	ZIP+4/Postal Code: 10036	
	If this address is a private res	sidence, check this box: 🗖				
	registration, or are registered,	with one or more state securities a ou are applying for SEC registratio	authorities, you must list all of y	our offices in the state	duct investment advisory business. It or states to which you are applying for e reporting to the SEC as an exempt	or registration or with
	(2) Days of week that you norma	lly conduct business at your <i>princi</i>	pal office and place of busines	s:		
	Normal business hours at thi 8AM TO 5PM					
	(3) Telephone number at this loc 212.578.0594(4) Facsimile number at this loca					
	908-552-2851	auon.				
G.	Mailing address, if different from y	our principal office and place of b	usiness address:			
	Number and Street 1: C/O METLIFE SECURITIES, INC.			nd Street 2: NUE OF THE AMERICA	S	
	City: NEW YORK	State: New York	Country: United Sta	tes	ZIP+4/Postal Code: 10036	
	If this address is a private residen	nce, check this box:				
Н.	If you are a sole proprietor, state y	your full residence address, if differ	rent from your <i>principal office</i> a	and place of business a	ddress in Item 1.F.:	
	Number and Street 1:		Number and Street 2	:		
	City:	State:	Country:	ZIP+4/Posta	Il Code:	

I.	Do you have one or more websites?					⊙	0
	-	for all of the other informa		· ·	which to access other information you have published ore than one portal address. Do not provide individua		
J.	J. Provide the name and contact information of your Chief Compliance Officer: If you are an exempt reporting adviser, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.						
	Name:		Other titles, if any:				
	Telephone number:		Facsimile numbe				
	Number and Street 1:		Number and Stree				
	City: State:		Country:		4/Postal Code:		
	Electronic mail (e-mail) address, if Chief Comp	Nignes Officer has one:	Country.	211	4/1 Ostal Oode.		
	Electronic mail (e-mail) address, il Gnier Comp	mance Officer has one.					
K.	Additional Regulatory Contact Person: If a personal provide that information here.	on other than the Chief C	ompliance Officer is a	authorized to receive	e information and respond to questions about this Fo	rm ADV,	you
	Name:		Titles:				
	Telephone number:		Facsimile numbe	er:			
	Number and Street 1:		Number and Stre	et 2:			
	City: State:		Country:	ZIP+	-4/Postal Code:		
	,		,				
	Electronic mail (e-mail) address, if contact per	son has one:					
	, , , , , , , , , , , , , , , , , , , ,					Yas	. No
L.	Do you maintain some or all of the books and reprincipal office and place of business?	ecords you are required to	o keep under Section	204 of the Advisers	s Act, or similar state law, somewhere other than you		0
	If "yes," complete Section 1.L. of Schedule D.					Voc	. No
M.	Are you registered with a foreign financial regula	atory authority?					. 140
	Answer "no" if you are not registered with a forei complete Section 1.M. of Schedule D.	gn financial regulatory au	nthority, even if you ha	ave an affiliate that is	s registered with a foreign financial regulatory author	ity. If "yes	s,"
	complete decilon 1.w. or defleatile D.					Yes	No
N.	Are you a public reporting company under Secti	ons 12 or 15(d) of the Se	curities Exchange Act	of 1934?		0	•
	If "yes," provide your CIK number (Central Index	Key number that the SE	C assigns to each pub	olic reporting compa	any):		
						Yes	No
O.	Did you have \$1 billion or more in assets on the	last day of your most rec	ent fiscal year?			0	•
P.	Provide your Legal Entity Identifier if you have or	ne:					
	A legal entity identifier is a unique number that of still in development. You may not have a legal e		each other in the fina	ancial marketplace.	In the first half of 2011, the legal entity identifier stan	dard was	s
SEC	TION 1.B. Other Business Names						
			No Information F	iled			
SEC	TION 1.F. Other Offices						
se		If you are applying for SE			u conduct investment advisory business. You must conduct investment advises with the SEC, or if you are an exempt reporting advises.		
	umber and Street 1: CAMPUS BOULEVARD		Nur	mber and Street 2:			
Cit		State:	Cou	ıntry:	ZIP+4/Postal Code:		
	y. EWTOWN SQUARE	Pennsylvania		ted States	19073		

Yes No

If this address is a private residence, check this box:								
Telephone Number: 610-325-6100	Facsimile Number: 610-325-6200							
Complete the following information for each office, oth separate Schedule D Section 1.F. for each location. If the largest five offices (in terms of numbers of <i>employ</i>	you are applying for SEC registration		et investment advisory business. You must complete a SEC, or if you are an <i>exempt reporting adviser</i> , list only					
Number and Street 1: 200 CLARENDON ST 19TH FL		Number and Street 2:						
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02116					
If this address is a private residence, check this box:								
Telephone Number: 617-585-4500	Facsimile Number: 617-369-9040							
Complete the following information for each office, oth separate Schedule D Section 1.F. for each location. If the largest five offices (in terms of numbers of <i>employ</i>	you are applying for SEC registration		et investment advisory business. You must complete a SEC, or if you are an <i>exempt reporting adviser</i> , list only					
Number and Street 1: 1305 CAMPUS PARKWAY		Number and Street 2: SUITE 100 AND SUITE 209						
City: WALL TOWNSHIP	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07753					
WALL TOWNSHII	New Jersey	Officed States	07733					
If this address is a private residence, check this box:								
Telephone Number: 732-751-3000	Facsimile Number: 732-751-3099							
Complete the following information for each office, oth separate Schedule D Section 1.F. for each location. If the largest five offices (in terms of numbers of <i>employ</i>	you are applying for SEC registration		t investment advisory business. You must complete a SEC, or if you are an exempt reporting adviser, list only					
Number and Street 1: 6500 SHERIDAN DRIVE		Number and Street 2: SUITE 300						
City: WILLIAMSVILLE		Country: United States	ZIP+4/Postal Code: 14221					
If this address is a private residence, check this box:		Officed Otales	17221					
Telephone Number: 716-854-7000	Facsimile Number:							
Complete the following information for each office, oth separate Schedule D Section 1.F. for each location. If the largest five offices (in terms of numbers of <i>employ</i>	you are applying for SEC registration		t investment advisory business. You must complete a SEC, or if you are an exempt reporting adviser, list only					
Number and Street 1: 795 RIDGE LAKE BOULEVARD		Number and Street 2: SUITE 200						
City: MEMPHIS	State: Tennessee	Country: United States	ZIP+4/Postal Code: 38120					
If this address is a private residence, check this box:		-						

Telephone Number: 901-767-5951	Facsimile Number:			
SECTION 1.I. Website Addresses				
List your website addresses. You must complete	a separate Schedule D Section 1.	I. for each website address.		
Website Address: HTTPS://WWW.METLIFE.COM	//NEW-ENGLAND-FINANCIAL/IND	EX.HTML		
SECTION 1.L. Location of Books and Records				
Complete the following information for each location Schedule D Section 1.L. for each location.	on at which you keep your books a	and records, other than your <i>princ</i>	cipal office and place of business. You must comple	ete a separate
Name of entity where books and records are kepts METLIFE	:			
Number and Street 1: 500 SCHOOLHOUSE ROAD		Number and Street 2:		
City: JOHNSTOWN	State: Pennsylvania	Country: United States	ZIP+4/Postal Code: 15904	
If this address is a private residence, check this be	ox:			
Telephone Number: 814-266-0200	Facsimile number:			
This is (check one): one of your branch offices or affiliates.				
C a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept at this REGISTERED REPRESENTATIVE REGISTRATION				
Name of entity where books and records are kept:	:			
Number and Street 1:		Number and Street 2:		
300 DAVIDSON AVENUE City:	State:	Country:	ZIP+4/Postal Code:	
SOMERSET	New Jersey	United States	08873	
If this address is a private residence, check this be	ox: 🗖			
Telephone Number: 732-893-6000	Facsimile number: 732-893-6539			
This is (check one): one of your branch offices or affiliates.				
C a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept at this BACK OFFICE AND NEW ACCOUNT RECORDS F		UDING FINANCIAL PLANNING [DEPT. RECORDS	
Name of entity where books and records are kept:				

Number and Street 1: 1095 AVE OF THE AMERICAS		Number and Street 2:							
City:	State:	Country:	ZIP+4/Postal Code:						
NEW YORK	New York	United States	10036						
If this address is a private residence, check this box:									
Telephone Number: 212-578-0594	Facsimile number: 212-578-8978								
This is (check one): one of your branch offices or affiliates.									
C a third-party unaffiliated recordkeeper.									
O other.									
Briefly describe the books and records kept at this location: INVESTMENT ADVISORY FILES									
Name of entity where books and records are kept: METLIFE									
Number and Street 1: ONE FINANCIAL CENTER		Number and Street 2: 21ST FLOOR							
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02111						
If this address is a private residence, check this box:									
Telephone Number: 617-267-6600	Facsimile number: 617-578-5548								
This is (check one): one of your branch offices or affiliates.									
C a third-party unaffiliated recordkeeper.									
O other.									
Briefly describe the books and records kept at this loc- FINANCIAL PLANNING RECORDS; ADVERTISING AN		NTAINED							
Name of entity where books and records are kept: IRON MOUNTAIN									
Number and Street 1: 32 GEORGE STREET		Number and Street 2:							
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02119						
If this address is a private residence, check this box:		Officed Glates	02113						
Telephone Number:	Facsimile number:								
(617) 445-9493	. accumile number.								
This is (check one): O one of your branch offices or affiliates.									
a third-party unaffiliated recordkeeper.									
C other.									

METLIFE

Briefly describe the books and records kept at this location: INVESTMENT ADVISORY RECORDS							
Name of entity where books and records are kept: LOCKWOOD ADVISORS, INC.							
Number and Street 1: 760 MOORE ROAD		Number and Street 2:					
City: KING OF PRUSSIA	State: Pennsylvania	Country: United States	ZIP+4/Postal Code: 19406				
If this address is a private residence, check this box:							
Telephone Number: 484-801-8100	Facsimile number:						
This is (check one): O one of your branch offices or affiliates.							
 a third-party unaffiliated recordkeeper. 							
O other.							
Briefly describe the books and records kept at this local CERTAIN LIMITED RECORDS RELATING TO THE FIRM		CES PROGRAM IS MAINTAINED ELE	CTRONICALLY BY LOCKWOOD ADVISORS, INC.				
Name of entity where books and records are kept: METLIFE SECURITIES							
Number and Street 1: 11225 NORTH COMMUNITY HOUSE ROAD		Number and Street 2:					
City: CHARLOTTE	State: North Carolina	Country: United States	ZIP+4/Postal Code: 28277				
If this address is a private residence, check this box: Γ							
Telephone Number: 980-949-3839	Facsimile number:						
This is (check one):							
$_{ m C}$ a third-party unaffiliated recordkeeper.							
O other.							
Briefly describe the books and records kept at this location: BACK OFFICE AND NEW ACCOUNT PAPERWORK FOR THE BROKER-DEALER							
SECTION 1.M. Registration with Foreign Financial Regulatory Authorities							
	No Informa	ation Filed					
tem 2 SEC Registration/Reporting							

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an annual updating amendment to your SEC registration.

A. To register (or remain registered) with the SEC, you must check at least one of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an annual updating amendment to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

(1) are a large advisory firm that either:

		(b) has regulatory assets with the SEC;	under management of \$90 mill	ion (in U.S. dollars) or more at the time of filing its m	nost recent annual updating amendment and is registered
	(2)	are a mid-sized advisory are either:	firm that has regulatory assets	under management of \$25 million (in U.S. dollars) of	or more but less than \$100 million (in U.S. dollars) and yo
		(a) not required to be reg	istered as an adviser with the si	tate securities authority of the state where you mainta	ain your <i>principal office and place of busin</i> ess, or
		(b) not subject to examina	ation by the state securities auth	nority of the state where you maintain your principal o	ffice and place of business;
		Click HERE for a list o	of states in which an investment	adviser, if registered, would not be subject to examin	nation by the state securities authority.
	(3)	have your principal office	and place of business in Wvom	ing (which does not regulate advisers);	
	(4)		and place of business outside t		
	(5)		•	ment company registered under the Investment Con	nnany Act of 1940:
	()		,		
	(6)			t \$25 million of regulatory assets under managemen	ant to section 54 of the Investment Company Act of 1940 at;
	(7)	are a pension consultant	with respect to assets of plans	having an aggregate value of at least \$200,000,000	that qualifies for the exemption in rule 203A-2(a);
	(8)		er rule 203A-2(b) that <i>controls</i> , i lace of business is the same as	• •	investment adviser that is registered with the SEC, and
		If you check this box, con	nplete Section 2.A.(8) of Schedu	ıle D.	
	(9)	are a newly formed advis	ser relying on rule 203A-2(c) bed	cause you expect to be eligible for SEC registration w	vithin 120 days;
		If you check this box, con	nplete Section 2.A.(9) of Schedu	ıle D.	
	(10)) are a multi-state adviser	that is required to register in 15	or more states and is relying on rule 203A-2(d);	
	` ′		nplete Section 2.A.(10) of Scheo		
	(11)) are an Internet adviser re			
				hibition against registration with the SEC;	
	1141	nave received an SEC or	iei exempling you nom the prof	mbition against registration with the SEC,	
	()	If you about this have some	anlata Castian 2 A (42) of Cabaa	lula D	
		-	nplete Section 2.A.(12) of Sched	dule D.	
		-	emain registered with the SEC.	dule D.	
	(13)	are no longer eligible to r			
Undare SE the all the	(13) der st calle C. If the SEC subsetem, un	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to equent filings or reports you nicheck the box(es) next to the	emain registered with the SEC. gs and State Reporting by Exen dvisers may be required to prov exempt reporting advisers may r report, check the box(es) next direct your notice filings or report u submit to the SEC. If this is an	npt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities wit to the state(s) that you would like to receive notice of	ADV and any amendments they file with the SEC. These th a copy of reports and any amendments they file with the f this and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently received.
te Se Under are SE the all the	(13) curit der st calle C. If th SEC subse m, un	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. gs and State Reporting by Exending dvisers may be required to provexempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an mose state(s).	inpt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities wit to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice in	th a copy of reports and any amendments they file with the file and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive
Undare SE the all the	(13) ecurit der st calle C. If tl SEC subse m, un risdic	are no longer eligible to relate laws, SEC-registered a ed notice filings. In addition, this is an initial application of this is an amendment to equent filings or reports you nicheck the box(es) next to the citions	emain registered with the SEC. gs and State Reporting by Exent dvisers may be required to provexempt reporting advisers may report, check the box(es) next direct your notice filings or report a submit to the SEC. If this is an those state(s).	npt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities wit to the state(s) that you would like to receive notice of	th a copy of reports and any amendments they file with the f this and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and
SE S	(13) curit der st calle C. If th SEC subse m, un	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. gs and State Reporting by Exending dvisers may be required to provexempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an mose state(s).	inpt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice if	th a copy of reports and any amendments they file with the file this and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive state(s) that currently receives the state of the state
Under SE all the	(13) curit der st calle C. If th SEC subse m, un risdic AL AK	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. Is and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an mose state(s).	inpt Reporting Advisers vide to state securities authorities a copy of the Form be required to provide state securities authorities wit to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice to NE NE NO	th a copy of reports and any amendments they file with the find this and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive some state some
Undare SE the all	(13) curit der st calle C. If th SEC subse m, un risdic AL AX	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of the second of the sec	emain registered with the SEC. gs and State Reporting by Exending the Exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an chose state(s).	inpt Reporting Advisers vide to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice if NE NV NH	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive some state(s) that currently received the state of the sta
Undare SE all the	(13) cecurit der st calle C. If tl SEC subse m, un risdic AL AK AZ AR	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. If and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report a submit to the SEC. If this is an those state(s). IL IN IN KS	inpt Reporting Advisers vide to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is NE NV NH NJ	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive some state some st
Under SE all the	(13) curit der st calle C. If tl SEC subse m, un risdic AL AZ AR CA CC CT	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. Its and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an mose state(s). IL IN KS KY KY LA ME	inpt Reporting Advisers vide to state securities authorities a copy of the Form be required to provide state securities authorities wit to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is NE NV NH NN NN NY NY NC	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently
Undare SE the all the	(13) curit der st calle C. If th SEC subse m, un risdic AL AX AZ AR CA	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. Is and State Reporting by Exending and State Reporting advisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an hose state(s). IL IN KS KY KY LA ME MD	inpt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is NE NV NH NN NN NY NC NC ND	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently
Underesse SE all the S	(13) curin der st calle C. If th SEC. subse m, un risdic AL AR CA CC CT DE	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the citions	emain registered with the SEC. Is and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report a submit to the SEC. If this is an mose state(s). IL IN KS KY KY LA ME MD MA	inpt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities wit to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is NE NV NH NN NN NY NC ND OH	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive so that currently receive so that currently receive so that the state of the state o
Underest SE	(13) curit der st calle C. If tl SEC subse m, un risdic AL AZ AR CA CC CT DE	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the ctions	emain registered with the SEC. Is and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an mose state(s). IL IN KS KY KY ME MD MA MA MI	inpt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is not	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently
Under SE the all the	(13) curitive calle cal	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of the sequent filings or reports you necheck the box(es) next to the ctions	emain registered with the SEC. Is and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an inose state(s). IL IN	ide to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is not	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive so that currently receive so that currently receive so that the state of the state o
Undare SE the all the	(13) curing der st calle C. If the SEC subset m, un risdice AL AZ CA CT DE GA GL	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you necheck the box(es) next to the citions.	emain registered with the SEC. Is and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an mose state(s). IL IN IN IN IN IN IN IN IN IN	inpt Reporting Advisers ride to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is NE NV NH NN NN NY NY NC ND ND OH OK OR PA	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently
e Se Undare SE the all the	(13) curitive calle cal	are no longer eligible to relate laws, SEC-registered and notice filings. In addition, this is an initial application of this is an amendment to requent filings or reports you nacheck the box(es) next to the ctions	emain registered with the SEC. Is and State Reporting by Exert dvisers may be required to prove exempt reporting advisers may report, check the box(es) next direct your notice filings or report submit to the SEC. If this is an inose state(s). IL IN	ide to state securities authorities a copy of the Form be required to provide state securities authorities with to the state(s) that you would like to receive notice of orts to additional state(s), check the box(es) next to the amendment to your registration to stop your notice is not	th a copy of reports and any amendments they file with the fithis and all subsequent filings or reports you submit to be state(s) that you would like to receive notice of this and fillings or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently receive solutions or reports from going to state(s) that currently

SECTION 2.A.(8) Related Adviser

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you control, are controlled by, or are under common control with an investment adviser that is registered with the SEC and your principal office and place of business is the same as that of the registered adviser, provide the following information:

Na	me of Registered Investment Adviser
CF	2D Number of Registered Investment Adviser
SE 80	C Number of Registered Investment Adviser 1 -
SEC	CTION 2.A.(9) Newly Formed Adviser
•	ou are relying on rule 203A-2(c), the newly formed adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for C registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:
	I am not registered or required to be registered with the SEC or a state securities authority and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
	I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.
SEC	CTION 2.A.(10) Multi-State Adviser
	ou are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC
-	istration. By checking the appropriate boxes, you will be deemed to have made the required representations.
If y	ou are applying for registration as an investment adviser with the SEC, you must make both of these representations:
	I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state securities authorities in those states.
	I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the state securities authorities of those states.
If v	ou are submitting your <i>annual updating amendment</i> , you must make this representation:
-	Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15
	states to register as an investment adviser with the state securities authorities in those states.
SEC	CTION 2.A.(12) SEC Exemptive <i>Order</i>
	ou are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:
,	
Ap	plication Number:
803	3-
Da	te of order.
••	
	n 3 Form of Organization
~	How are you organized?
	How are you organized? Corporation
	Correction
. u	© Corporation
- 4	Corporation Sole Proprietorship Limited Liability Portporship (LLP)
	Corporation Sole Proprietorship Limited Liability Partnership (LLP)
	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership
·	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC)
·	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC) Limited Partnership (LP)
В.	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC) Limited Partnership (LP) Other (specify): If you are changing your response to this Item, see Part 1A Instruction 4.
	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC) Limited Partnership (LP) Other (specify):
В.	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC) Limited Partnership (LP) Other (specify): If you are changing your response to this Item, see Part 1A Instruction 4. In what month does your fiscal year end each year? SEPTEMBER
В.	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC) Limited Partnership (LP) Other (specify): If you are changing your response to this Item, see Part 1A Instruction 4.
В.	Corporation Sole Proprietorship Limited Liability Partnership (LLP) Partnership Limited Liability Company (LLC) Limited Partnership (LP) Other (specify): If you are changing your response to this Item, see Part 1A Instruction 4. Under the laws of what state or country are you organized?

	If yo	u are changing your response to this Item, see Part 1A Inst	truction 4.		
Iten	n 4 Su	occessions			
A.	Are	you, at the time of this filing, succeeding to the business of	f a registered investment adviser		No ⊙
	If "ye	es", complete Item 4.B. and Section 4 of Schedule D.			
В.	Date	e of Succession: (MM/DD/YYYY)			
			m ADV filing do not report the su	ccession again. Instead, check "No." See Part 1A Instruction 4.	
	, ,				
SEC	CTION	4 Successions			
			No Information File	d	
		ormation About Your Advisory Business - Employees, Cli	· · · · · · · · · · · · · · · · · · ·		
		es to this Item help us understand your business, assist us in 5.a. provides additional guidance to newly formed advise		tions, and provide us with data we use when making regulatory policy. Part 1.	Α
En	nploye	ees			
		e organized as a sole proprietorship, include yourself as an function, you should count that employee in each of your r		tem 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more , (4), and (5).	
A.	Appi 2514	roximately how many <i>employees</i> do you have? Include full-	and part-time employees but do	not include any clerical workers.	
B.	(1)	Approximately how many of the <i>employees</i> reported in 5.A 1396	A. perform investment advisory fu	nctions (including research)?	
	(2)	Approximately how many of the <i>employees</i> reported in 5.A 1815	A. are registered representatives	of a broker-dealer?	
	(3)	Approximately how many of the <i>employees</i> reported in 5.A 1330	A. are registered with one or more	state securities authorities as investment adviser representatives?	
	(4)	Approximately how many of the <i>employees</i> reported in 5.A investment adviser other than you? 1442	A. are registered with one or more	state securities authorities as investment adviser representatives for an	
	(5)	Approximately how many of the <i>employees</i> reported in 5.A 1845	A. are licensed agents of an insur	ance company or agency?	
	(6)	Approximately how many firms or other <i>persons</i> solicit adv	visory <i>clients</i> on your behalf?		
	In yo	our response to Item 5.B.(6), do not count any of your emplo	oyees and count a firm only once	– do not count each of the firm's employees that solicit on your behalf.	
Cli	ients				
In <u>:</u>	your r	esponses to Items 5.C. and 5.D. do not include as "clients"	the investors in a private fund you	ı advise, unless you have a separate advisory relationship with those investors	
C.	(1)	To approximately how many <i>clients</i> did you provide invest	ment advisory services during yo	ur most recently completed fiscal year?	
		O 0	O 1-10	O 11-25	
		C 26-100	More than 100		
			If more than 100, how many? (round to the nearest 100)		
	(2)	Approximately what percentage of your <i>clients</i> are non- <i>Un</i> 0%	28400 nited States persons?		
1					

country where you reside.

t. I	ousi nve	ness stme	oses of this Item 5.D., the category "individuals" inclues organized as sole proprietorships. The category the company Act of 1940. Unless you provide advisory Act of 1940, check "None" in response to Item 5.D.	"business development companies" ry services pursuant to an investme	consists nt adviso	of companies	s that have m an investmer	ade an election nt company re	on pursuar	nt to section (54 of the
(1)	What types of <i>clients</i> do you have? Indicate the approximate percentage that each type of <i>client</i> comprises of your total number of <i>clients</i> . If a <i>client</i> fits into more than o category, check all that apply.									n one
		-117			<u>None</u>	<u>Up to 10%</u>	<u>11-25%</u>	26-50%	<u>51-75%</u>	<u>76-99%</u>	100%
		(a)	Individuals (other than high net worth individuals)		0	0	0	0	0	•	0
		(b)	High net worth individuals		0	•	0	0	0	0	0
		(c)	Banking or thrift institutions		•	0	0	0	0	0	0
		(d)	Investment companies		\odot	0	0	0	0	0	0
		(e)	Business development companies		⊙	0	0	0	0	0	0
		(f)	Pooled investment vehicles (other than investment	companies)	•	0	0	0	0	0	0
		(g)	Pension and profit sharing plans (but not the plan p	participants)	0	•	0	0	0	0	0
		(h)	Charitable organizations		0	•	0	0	0	0	0
		(i)	Corporations or other businesses not listed above		0	•	0	0	0	0	0
		(j)	State or municipal government entities		\odot	0	0	0	0	0	0
		(k)	Other investment advisers		•	0	0	0	0	0	0
		(I)	Insurance companies		•	0	0	0	0	0	0
		(m)	Other: MISC		0	•	0	0	0	0	0
(:	2)		cate the approximate amount of your regulatory asse more than one category, check all that apply.	ets under management (reported in I	tem 5.F.		itable to each	of the followi		client. If a cli	<i>ient</i> fits >75%
		(a)	Individuals (other than high net worth individuals)			0	0	0	_	•	0
		(b)	High net worth individuals			0	0	0		o	0
		(c)	Banking or thrift institutions			•	0	0		0	0
		(d)	Investment companies			•	0	0		0	0
		(e)	Business development companies			•	0	0		0	0
		(f)	Pooled investment vehicles (other than investment	companies)		•	0	0		0	0
		(g)	Pension and profit sharing plans (but not the plan)	•		0	•	0		0	0
		(h)	Charitable organizations	'		0	•	0		0	
		(i)	Corporations or other businesses not listed above								0
		(i)	State or municipal government entities			0	•	0		0	0
		(k)	Other investment advisers			•	0	0		0	0
		(I)	Insurance companies			•	0	0		0	0
			Other: MISC			0	○ ⊙	0		0	0
								Č		V	
Com	oen	satio	n Arrangements								
		are c	compensated for your investment advisory services by	y (check all that apply):							
	V	(1) (2)	A percentage of assets under your management Hourly charges								
		(3)	Subscription fees (for a newsletter or periodical)								
!	~	(4)	Fixed fees (other than subscription fees)								
1		(5)	Commissions Performance based food								
		(6) (7)	Performance-based fees Other (specify):								
			tion About Your Advisory Business - Regulatory A	ssets Under Management							
Regu	lato	ory A	ssets Under Management								Yes No
F. (1)	Do yo	ou provide continuous and regular supervisory or ma	anagement services to securities po	rtfolios?						© 0
(:	2)	If yes	, what is the amount of your regulatory assets under	management and total number of a	accounts	?					
				U.S. Dollar Amount			Total Numbe	r of Accounts			
			retionary: (a)	\$ 846,693,367		(d)	4,217				
			-Discretionary: (b)	\$ 4,479,798,454		(e)	30,882				
		Tota	l: (c)	\$ 5,326,491,821		(f)	35,099				

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item. Item 5 Information About Your Advisory Business - Advisory Activities **Advisory Activities** G. What type(s) of advisory services do you provide? Check all that apply. (1) Financial planning services V (2) Portfolio management for individuals and/or small businesses Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940) (4) Portfolio management for pooled investment vehicles (other than investment companies) V (5) Portfolio management for businesses (other than small businesses) or institutional clients (other than registered investment companies and other pooled investment vehicles) V (6) Pension consulting services V (7) Selection of other advisers (including *private fund* managers) (8) Publication of periodicals or newsletters (9) Security ratings or pricing services (10) Market timing services (11) Educational seminars/workshops (12) Other(specify): Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D. H. If you provide financial planning services, to how many clients did you provide these services during your last fiscal year? \circ 0 O 1-10 11 - 25 \circ 26 - 50 0 51 - 100 0 101 - 250 0 251 - 500 0 More than 500 **②** If more than 500, how many? 1,500 (round to the nearest 500) In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors. If you participate in a wrap fee program, do you (check all that apply): (1) sponsor the wrap fee program? (2) act as a portfolio manager for the wrap fee program? If you are a portfolio manager for a wrap fee program, list the names of the programs and their sponsors in Section 5.1.(2) of Schedule D. If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check either Item 5.I.(1) or 5.I.(2). Yes No In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? \odot SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies No Information Filed SECTION 5.I.(2) Wrap Fee Programs If you are a portfolio manager for one or more wrap fee programs, list the name of each program and its sponsor. You must complete a separate Schedule D Section 5.I.(2) for each wrap fee program for which you are a portfolio manager. Name of Wrap Fee Program WEALTH MANAGEMENT SERVICES - ADVISOR SELECT

Name of Sponsor NEW ENGLAND SECURITIES CORP.							
Item 6 Other Business Activities							
In this Item, we request information about your firm's other business activities.							
A You are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify): If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B, complete Section 6.A. of Schedule D. B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? If yes, is this other business your primary business? If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name. (3) Do you sell products or provide services other than investment advice to your advisory clients?	Yes ○ ○ Yes	0					
(5) Do you sell products of provide services other than investment advice to your advisory chems:	•	0					
If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name. SECTION 6.A. Names of Your Other Businesses							
No Information Filed							
SECTION 6.B.(2) Description of Primary Business							
Describe your primary business (not your investment advisory business):							
If you engage in that business under a different name, provide that name:							
SECTION 6.B.(3) Description of Other Products and Services							
Describe other products or services you sell to your <i>client</i> , You may omit products and services that you listed in Section 6.B.(2) above. VARIABLE INSURANCE PRODUCTS AND GENERAL SECURITIES, INCLUDING, BUT NOT LIMITED TO, STOCKS, BONDS, MUNICIPAL AND GOVERNMENT SECURITIES, FUNDS, AND REGISTERED LIMITED PARTNERSHIPS, TO THE PUBLIC.	MUTU <i>£</i>	AL					
If you engage in that business under a different name, provide that name.	If you engage in that business under a different name, provide that name.						
Item 7 Financial Industry Affiliations							
In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between y your <i>clients</i> .	ou and						
A. This part of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> are all of your <i>advisory affiliate person</i> that is under common <i>control</i> with you.	es and	any					
You have a <i>related person</i> that is a (check all that apply): ☑ (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) ☑ (2) other investment adviser (including financial planners) ☐ (3) registered municipal advisor ☐ (4) registered security-based swap dealer ☐ (5) major security-based swap participant							

	 (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (7) futures commission merchant 							
	(8) banking or thrift institution							
	(9) trust company(10) accountant or accounting firm							
	(10) accountant of accounting min							
	(12) insurance company or agency							
	 (13) pension consultant (14) real estate broker or dealer 							
	(15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles							
	(16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles							
	For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.							
	Vou do not need to complete Section 7.4. of Schodule D for any related person if: (1) you have no business dealings with the related person in connection with advisory so	rvice	00					
	You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.							
	You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule)					
	206(4)-2 of the Advisers Act.							
SE	CTION 7.A. Financial Industry Affiliations							
Co	omplete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.							
1.	Legal Name of <i>Related Person</i> : NEW ENGLAND LIFE INSURANCE COMPANY							
	NEW ENGLAND EILE INGGRANGE GOWLANT							
2.	·							
	NEW ENGLAND LIFE INSURANCE COMPANY							
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)							
	Of Cathoric							
	Other							
4.	Related Person's CRD Number (if any):							
5.	Related Person is: (check all that apply)							
	(a) broker-dealer, municipal securities dealer, or government securities broker or dealer							
	(b) other investment adviser (including financial planners)							
	(c) ☐ registered municipal advisor (d) ☐ registered security-based swap dealer							
	(e) major security-based swap participant							
	(f) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)							
	(g) ull futures commission merchant							
	(h) banking or thrift institution							
	 (i) □ trust company (j) □ accountant or accounting firm 							
	(j) accountant or accounting firm (k) accountant or accounting firm							
	(I) ☑ insurance company or agency							
	(m) pension consultant							
	(n) real estate broker or dealer							
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles							
	(p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No					
6.	Do you control or are you controlled by the related person?		0					
7	Are you and the related person under common control?	_	_					
' '		⊙	0					
8.		0	•					
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0					
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:							
	Number and Street 1: Number and Street 2:							

		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \square		
_			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	\circ	\circ
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	\circ	\odot
	(b)	If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.		
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	\odot	\circ
12.	Do y	ou and the <i>related person</i> share the same physical location?	\odot	\circ
1.	U	al Name of Related Person:		
	MET	LIFE INVESTORS USA INSURANCE COMPANY		
2.		ary Business Name of Related Person:		
	IVIE	LIFE INVESTORS USA INSURANCE COMPANY		
3	Rela	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
J.	- NGIA	led 1 6/30/13 SEC 1 lie Nulliber (ii arry) (e.g., 001-, 0-, 002-)		
	or			
	Othe	er		
4.	Rela	ted Person's CRD Number (if any):		
_	5 /			
5.		nted Person is: (check all that apply)		
		broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
	(b)	registered municipal advisor		
	` '	registered security-based swap dealer		
		major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
		banking or thrift institution		
	(i)	Trust company		
	(j)	accountant or accounting firm		
	(k)	□ lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	.,	
6	Do	ou control or are you controlled by the related person?	Yes	
0.	ро у	ou control of are you controlled by the related person:	0	⊙
7	۸ د م ۱	value and the related nersen under common control?		
7.	Are	you and the related person under common control?	⊙	0
0	(-)			
8.		Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	\circ	⊙
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not	\circ	\circ
		operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
		If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets:		
	(c)	Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.		
		No Information Filed		

11.	Do you and the related person share any supervised persons?	⊙	0
12.	Do you and the related person share the same physical location?	0	•
	Legal Name of <i>Related Person</i> : METLIFE ADVISERS, LLC		
	Primary Business Name of <i>Related Person</i> : METLIFE ADVISERS, LLC		
	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 47459		
	or Other		
	Related Person's CRD Number (if any): 107312		
	Related Person is: (check all that apply) (a)	Yes	No
6.	Do you control or are you controlled by the related person?	_	⊙
7.	Are you and the related person under common control?	0	0
	 (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i>? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i>' funds or securities that are maintained at the <i>related person</i>? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i>'s office responsible for <i>custody</i> of your <i>clients</i>' assets: Number and Street 1:	00	© C
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes O	No ⊙
	(b) If the answer is yes, under what exemption?		
	 (a) Is the related person registered with a foreign financial regulatory authority? (b) If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered. No Information Filed 	0	•
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the related person share the same physical location?	•	0
	Legal Name of <i>Related Person</i> : METLIFE INVESTORS DISTRIBUTION COMPANY		

2. Primary Business Name of Related Person:

	MET	LIFE INVESTORS DISTRIBUTION COMPANY						
3.		elated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 53064						
	or Othe	er						
4.	<i>Rela</i> 1076	nted Person's CRD Number (if any): 622						
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	V					
6	Dov	ou control or are you controlled by the related person?	Yes					
О.	Бо у	ou control of are you controlled by the related person?	0	•				
7.	Are y	you and the related person under common control?	•	0				
8.		Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•				
		If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0				
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:						
		Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: □						
	(-)		Yes					
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	0	0				
	()							
10.		Is the related person registered with a foreign financial regulatory authority?	0	•				
	(b)	If the answer is yes, list the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed						
11.	Do y	ou and the related person share any supervised persons?	•	0				
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•				
1.	•	al Name of <i>Related Person</i> : ST METLIFE INVESTORS INSURANCE COMPANY						
	1 1110	7. METER E 111/2010 (10 110 110 110 110 110 110 110 110						
2.		ary Business Name of <i>Related Person</i> : ST METLIFE INVESTORS INSURANCE COMPANY						
3.	Rela -	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)						
	or Othe	er en						
4.	Rela	ated Person's CRD Number (if any):						

5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(b)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	ou control or are you controlled by the related person?	\circ	\odot
7.	Are y	ou and the related person under common control?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not		
	(~)	operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	\circ	\circ
	(b)	If the answer is yes, under what exemption?		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	\odot
	(b)	If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.		
		No Information Filed		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	\odot	0
12.	Do y	ou and the <i>related person</i> share the same physical location?	\circ	\odot
1.	Lega	I Name of <i>Related Person</i> :		
	_	ERAL AMERICAN LIFE INSURANCE COMPANY		
2.	Prim	ary Business Name of Related Person:		
	GEN	ERAL AMERICAN LIFE INSURANCE COMPANY		
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	-			
	or			
	Othe			
4.	Rela	ted Person's CRD Number (if any):		
5	Rola	red Person is: (check all that apply)		
٠.		broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(a) (b)			
		the other investment adviser (including financial planners)		
	(C)			
	(d)	registered municipal advisor		
	(d)	registered municipal advisor registered security-based swap dealer		
	(d) (e)	registered municipal advisor registered security-based swap dealer major security-based swap participant		
	(d) (e) (f)	registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(d) (e) (f) (g)	registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(d) (e) (f)	registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		

	(j) (k)	accountant or accounting firm lawyer or law firm		
	(I) (m)	✓ insurance company or agency✓ pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do۱	ou control or are you controlled by the related person?		⊙
	- ,			٠
7.	Are	you and the related person under common control?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets: Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:	Vaa	Na
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	0
	(b)	If the answer is yes, under what exemption?		
	()			
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	\odot
	(b)	If the answer is yes, list the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.		
11	Do :	No Information Filed rou and the <i>related person</i> share any <i>supervised persons</i> ?	_	_
			⊙	0
12.	Doy	ou and the <i>related person</i> share the same physical location?	0	⊙
	MET	al Name of <i>Related Person</i> : TLIFE INSURANCE COMPANY OF CONNECTICUT hary Business Name of <i>Related Person</i> :		
		LIFE INSURANCE COMPANY OF CONNECTICUT		
3.	Rela -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er en		
4.	Rela	ated Person's CRD Number (if any):		
5.		ated Person is: (check all that apply)		
	(a) (b)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(g) (h)	banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	□ lawyer or law firm □ incurance company or agency		
	(l) (m)	 ✓ insurance company or agency ✓ pension consultant 		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6	Do.	rou control or are you controlled by the related person?		No
6.	טט }	ου συπιστοι ατο γου συπιτοπού με τοιαίου μοισυπ:	\circ	\odot

7.	Are y	you and the related person under common control?	⊙	0	
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•	
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?				
		If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:			
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:			
		If this address is a private residence, check this box:			
0	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		No -	
9.		If the answer is yes, under what exemption?	0	0	
	(5)	in the answer is yes, under what exemption:			
10.		Is the related person registered with a foreign financial regulatory authority?	0	\odot	
	(b) If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered. No Information Filed				
11.	Do y	rou and the related person share any supervised persons?	•	0	
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•	
					1
1.	-	al Name of <i>Related Person</i> : LIFE INVESTORS INSURANCE COMPANY			
2.	Prim	pary Business Name of <i>Related Person</i> :			
		LIFE INVESTORS INSURANCE COMPANY			
3.	Rela -	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or				
	Othe				
4.	Rela	ated Person's CRD Number (if any):			
5.	Rela	nted Person is: (check all that apply)			
	(a) (b)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)			
	(c)	registered municipal advisor			
	(d)	registered security-based swap dealer major security-based swap participant			
	(e) (f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)			
	(g)	futures commission merchant			
	(h) (i)	banking or thrift institution trust company			
	(i)	accountant or accounting firm			
	(k)	lawyer or law firm			
	(l) (m)	✓ insurance company or agency✓ pension consultant			
	(n)	real estate broker or dealer			
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	s No	
6.	Do y	ou control or are you controlled by the related person?	0	•	
7.	Are y	you and the related person under common control?	•	0	
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•	
		If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> fundamentally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your clients' fundamentally independent (pursuant to rule 206(4)-(2)(d)	0		
		or securities that are maintained at the <i>related person</i> ? If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets:			
	. ,	Number and Street 1: Number and Street 2:			
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:			

			Yes	No			
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0			
			-				
	(b)	If the answer is yes, under what exemption?					
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	\circ	\odot			
	(b)	If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.					
		No Information Filed					
11	Do v	ou and the related person share any supervised persons?	_	_			
• • •	<i>D</i> 0 y	ou and the relation person chare any supervisor persone.	\odot	O			
12.	Do y	ou and the <i>related person</i> share the same physical location?	\circ	\odot			
1	Lea	al Name of Related Person:					
•	_	LIFE SECURITIES INC.					
	IVIL 1	EII E GEGORATIEG ING.					
_							
2.		ary Business Name of Related Person:					
	MET	LIFE SECURITIES INC.					
3.	Rela	nted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)					
	801	- 22306					
	or						
	Othe	or and the state of the state o					
1	Polo	nted Person's CRD Number (if any):					
4.	142						
	142						
5.	Rela	nted Person is: (check all that apply)					
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer					
	(b)	other investment adviser (including financial planners)					
	(c)	registered municipal advisor					
	(d)	registered security-based swap dealer					
		major security-based swap participant					
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)					
	(g)	futures commission merchant					
	(h)	banking or thrift institution					
	(i)	Trust company					
	(j)	accountant or accounting firm					
	(k)	☐ lawyer or law firm					
	(I)	insurance company or agency					
	(m)	pension consultant					
	(n)	real estate broker or dealer					
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles					
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles					
			Yes	No			
6.	Do v	ou control or are you controlled by the related person?					
٠.	_ ,		0	⊙			
_							
7.	Are	you and the related person under common control?	\odot	\circ			
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•			
	` ,		_				
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not	\circ	\circ			
		operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds					
		or securities that are maintained at the <i>related person</i> ?					
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:					
		Number and Street 1: Number and Street 2:					
		City: State: Country: ZIP+4/Postal Code:					
		If this address is a private residence, check this box:					
			Yes	No			
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		•			
٠.	` '						
	(b)	If the answer is yes, under what exemption?					
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•			
	(b)	If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.		~			
	(~ <i>)</i>	No Information Filed					
4.4	D -						
11.	D0 У	ou and the <i>related person</i> share any <i>supervised persons</i> ?	\odot	\circ			

	Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : METROPOLITAN LIFE INSURANCE COMPANY		
2.	Primary Business Name of <i>Related Person</i> : METROPOLITAN LIFE INSURANCE COMPANY		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's CRD Number (if any):		
5.	Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) tutures commission merchant (h) banking or thrift institution (i) trust company (j) accountant or accounting firm (k) lawyer or law firm (l) winsurance company or agency (m) pension consultant (n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	Vas	Ne
6.	Do you control or are you controlled by the related person?	Yes C	
7.	Are you and the related person under common control?	•	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:		
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: □		
		Yes	No
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?(b) If the answer is yes, under what exemption?	0	0
10.	(a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	•
	(b) If the answer is yes, list the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	~	~
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	•	0
	Legal Name of Related Person: METROPOLITAN TOWER LIFE INSURANCE COMPANY Primary Business Name of Related Person: METROPOLITAN TOWER LIFE INSURANCE COMPANY		

3.	Rela	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er er		
1	Rela	ated Person's CRD Number (if any):		
•	71070			
5.	Rela	ated Person is: (check all that apply)		
		broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b)	other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	□ lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	_	
_	D		Yes	
э.	ро у	you control or are you controlled by the related person?	0	⊙
7.	Are	you and the related person under common control?	•	_
	•		٠	
В.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8(a) above, have you overcome the presumption that you are not	Ö	
		operationally independent (pursuant to rule 206(4)-(2)(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds		
		or securities that are maintained at the related person?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' assets:		
		Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box:		
			Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority?	_	_
10.		If the answer is yes, list the name and country, in English, of each foreign financial regulatory authority with which the related person is registered.	\circ	⊚
	(D)	No Information Filed		
11.	Do y	ou and the related person share any supervised persons?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	0	\odot
en	1 7 <i>Pr</i>	rivate Fund Reporting		
			Yes	No
3.	Are yo	ou an adviser to any <i>private fund</i> ?	0	•
	j			•
	If "yes	s," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in		
		ction 6 of the Instructions to Part 1A. If another adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g.	1., if y	you
	are a	subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.		
	In eith	her case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar		
		nation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's r		€.
	J			

SECTION 7.B.(1) Private Fund Reporting

SECTION 7.B.(2) Private Fund Reporting

Proprietary Interest in Client Transactions

No Information Filed

tem 8	Partici	pation o	r Interest i	n <i>Client</i>	Transactions
toiii t	, , a, ,,,,,	pation o		0110116	11411340110113

In this Item, we request information about your participation and interest in your clients' transactions. This information identifies additional areas in which conflicts of interest may occur between you and your clients.

Like Item 7, Item 8 requires you to provide information about you and your related persons, including foreign affiliates.

A.	Do	you or any related person:	Yes	No
	(1)	buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	0	•
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	•	0
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	0	0
Sal	es In	nterest in <i>Client</i> Transactions		
B.	Do	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	⊙
	(2)	recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative?	0	•
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	0
Inv	estm	nent or Brokerage Discretion		
C.	Do	you or any related person have discretionary authority to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	•	0
	(2)	amount of securities to be bought or sold for a client's account?	•	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's account?	0	•
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	0	\odot
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers <i>related persons</i> ?	0	0
E.	Do	you or any related person recommend brokers or dealers to clients?	•	0
F.	If yo	ou answer "yes" to E above, are any of the brokers or dealers <i>related persons</i> ?	•	0
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	0	•
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any related persons receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	0	0
H.	Do	you or any related person, directly or indirectly, compensate any person for client referrals?	•	0
I.	Do	you or any related person, directly or indirectly, receive compensation from any person for client referrals?	•	0
		esponding to Items 8.H and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H) or received from (in answering to lient referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.	ering i	Item
ltem	9 Cı	ustody		

In this Item, we ask you whether you or a related person has custody of client (other than clients that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

A. (1)	Do you have <i>custody</i> of any advisory <i>clients</i> ':	Yes 1	No	
	(a) cash or bank accounts?	0	•	
	(b) securities?	0	0	

If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your

 \odot \circ

		nts' accounts, or (ii) a related person has custody of client as not operationally independent (pursuant to Advisers Act rule	ssets in connection with advisory services you provide to clients, but you have overcome the presumption to e 206(4)-(2)(d)(5)) from the related person.	hat yo	u
	(2)	If you checked "ves" to Item 9.A.(1)(a) or (b), what is the ap	proximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which you have <i>custody</i> :		
	(-)		Number of <i>Clients</i>		
		(a) \$ (b)	Number of Ottories		
		(ε)			
	of th	hose assets and the number of those clients in your respons	custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the se to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services your er of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.E	ou prov	
B.	(1)	In connection with advisory services you provide to <i>clients</i> , (a) cash or bank accounts?	do any of your related persons have custody of any of your advisory clients':	Yes	
		(b) securities?			⊙ ⊙
	You	are required to answer this item regardless of how you ans	wered Item 9.A.(1)(a) or (b).		
	(2)	If you checked "yes" to Item 9.B.(1)(a) or (b), what is the ap custody:	proximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which your <i>related persons</i>	have	
		U.S. Dollar Amount Total	Number of Clients		
		(a) \$ (b)			
C.	(1) (2) (3)	A qualified custodian(s) sends account statements at least An <i>independent public accountant</i> audits annually the pool investors in the pools. An <i>independent public accountant</i> conducts an annual sur	curities in connection with advisory services you provide to <i>clients</i> , check all the following that apply: t quarterly to the investors in the pooled investment vehicle(s) you manage. Ided investment vehicle(s) that you manage and the audited financial statements are distributed to the rprise examination of <i>client</i> funds and securities. Introl report with respect to custodial services when you or your <i>related persons</i> are qualified custodians		
	repo		f Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal of itor information in Section 9.C. of Schedule D if you already provided this information with respect to the priv		<i>!</i>
D.	_	you or your related person(s) act as qualified custodians for you act as a qualified custodian	your clients in connection with advisory services you provide to clients?	Yes	
				_	⊙
	(2)	your related person(s) act as qualified custodian(s)		0	⊙
	-		as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be you have determined the related person to be operationally independent under rule 206(4)-2 of the Adviser		
E.	-	ou are filing your <i>annual updating amendment</i> and you were e (MM/YYYY) the examination commenced:	subject to a surprise examination by an independent public accountant during your last fiscal year, provid	e the	
F.	-	ou or your related persons have custody of client funds or sectors our clients in connection with advisory services you provide	curities, how many persons, including, but not limited to, you and your related persons, act as qualified cus to clients?	stodiar	ns
SEC	TION	9.C. Independent Public Accountant			
			No Information Filed		
Item	10 C	Control Persons			
		em, we ask you to identify every <i>person</i> that, directly or indirect	ctly, controls you.		
				· · ·	
Sch	nedul		ete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive on san amendment and you are updating information you reported on either Schedule A or Schedule B (or bothedule C.		

 \circ

A. Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?

	If yes, complete Section 10.A. of Schedule D.		
В.	If any <i>person</i> named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Ac please complete Section 10.B. of Schedule D.	t of 1934	4,
SEC	CTION 10.A. Control Persons		
	No Information Filed		
056			
	CTION 10.B. Control Person Public Reporting Companies	A 1 1 40	20.4
В.	If any person named in Schedules A, B, or C, or in Section 10 A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange A please provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):	ACT OF 19	34,
	(1) Full legal name of the public reporting company:	IFE INC	
	(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting company): 10992	219	
	11 Disclosure Information		
app	his Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to determine whether to elication for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem us on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below.	-	
par	ur advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar functions); (2) all of your officency, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled by you. If you are a "separately identificant or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are.		
the eve	ou are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the ler, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.	ate of an	7
Υοι	u must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
		Yes	s No
	any of the events below involve you or any of your supervised persons?	0	•
	r "yes" answers to the following questions, complete a Criminal Action DRP:	V	
A.	In the past ten years, have you or any advisory affiliate: (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?	_	s No
		0	⊙
	(2) been charged with any felony?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are pending.	e curren	tly
B.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investmen related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	nt- O	•
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are pending.	ə curren	tly
Foi	r "yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	s No
	(1) found you or any advisory affiliate to have made a false statement or omission?	\odot	\circ
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	\odot	\circ
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	or o	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	•	0
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	•	0
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		

	(1)	ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	\odot	\circ
	(2)	ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	•	0
	(3)	ever found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4)	in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity?	•	0
	(5)	ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?	0	•
E.	Has	any self-regulatory organization or commodities exchange ever:		
	(1)	found you or any advisory affiliate to have made a false statement or omission?	•	0
	(2)	found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	•	0
	(3)	found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4)	disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•
F.	Has	an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended?	0	•
G.	Are	you or any advisory affiliate now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	•	0
Fo	r "yes	answers to the following questions, complete a Civil Judicial Action DRP:		
Н.	(1)	Has any domestic or foreign court:	Yes	No
		(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	0	\odot
		(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	0	\odot
		(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	•	0
	(2)	Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	0	•
Iten	n 12 S	mall Businesses		
		is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the design is iness or "small organization" under rule 0-7.	inition	n of
tha	n \$25	his Item 12 only if you are registered or registering with the SEC and you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from S istration.		İ
For	purp	oses of this Item 12 only:		
	• C	otal Assets refers to the total assets of a firm, rather than the assets managed on behalf of <i>clients</i> . In determining your or another <i>person's</i> total assets, you may use to a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger). <i>control</i> means the power to direct or cause the direction of the management or policies of a <i>person</i> , whether through ownership of securities, by contract, or otherwise <i>erson</i> that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another <i>person</i> is professionally the other <i>person</i> .	Any	
_	Did	you have total assets of \$5 million or more on the last day of your most recent fiscal year?	Yes	
			0	0
"	yes, _.	you do not need to answer Items 12.B. and 12.C.		
B.		control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on	0	0
		the last day of its most recent fiscal year? control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C		you:	~	
U.	Are			
0.	(1)	controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
O.	(1)		_	0

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
 - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
 - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

 Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
 - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
 - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? $_{\bigodot}$ Yes $_{\bigodot}$ No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
 - A 5% but less than 10% C 25% but less than 50% E 75% or more
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Status	Date Status Acquired MM/YYYY	Ownership Code	Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
NEW ENGLAND LIFE INSURANCE COMPANY ("NELICO" OR "NEW ENGLAND FINANCIAL")	DE	100% SHAREHOLDER	01/2004	E	Y	N	
HALPERIN, JEFFREY PAUL	I	ANTI-MONEY LAUNDERING OFFICER	08/2006	NA	Υ	N	2899327
COHN, MARC ALLAN	I	CHIEF COMPLIANCE OFFICER, INVESTMENT ADVISER	09/2006	NA	Υ	N	2464524
MARTINEZ, JOHN GREGORY	I	VICE PRESIDENT AND FINANCIAL OPERATIONS PRINCIPAL	01/2007	NA	Υ	N	2210722
LACEK, MICHAEL J	1	CHIEF LEGAL OFFICER	03/2008	NA	Υ	N	xxx-xx-xxxx
LAPIANA, PAUL ANTHONY	1	DIRECTOR	06/2012	NA	Υ	N	2237245
FORGET, ELIZABETH MARY	1	DIRECTOR AND CHAIRMAN	06/2013	NA	Υ	N	2767945
HALPERIN, JEFFREY PAUL	I	CHIEF COMPLIANCE OFFICER, BROKER-DEALER	08/2013	NA	Y	N	2899327
REYNOLDS, TYLA LYNN	I	SECRETARY	03/2014	NA	Υ	N	6318828
MURPHY, SEAN ANDREW	I	VICE-PRESIDENT	07/2014	NA	Υ	N	1963911
MINK, DAVID MYERS	I	CHIEF OPERATIONS OFFICER	09/2014	NA	Υ	N	2606831
HONKUS, TINA MARIE	I	VICE-PRESIDENT, LICENSING AND REGISTRATION	12/2014	NA	Υ	N	1288648
CRUZ ORI ANDO RAFAFI JR	l _I	PRESIDENT AND CHAIRMAN	12/2014	NA	Υ	N	2311194

Schedule B

Indirect Owners

- 1. Complete Schedule B only if you are submitting an initial application. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

- (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.

- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual. 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued). 6. Ownership codes are: C - 25% but less than 50% E - 75% or more D - 50% but less than 75% F - Other (general partner, trustee, or elected manager) 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons. (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act. (c) Complete each column.

FULL LEGAL NAME (Individuals: Last	DE/FE/I	Entity in Which Interest is	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of
Name, First Name, Middle Name)		Owned		Acquired	Code	Person		Birth, IRS Tax No. or Employer ID No.
				MM/YYYY				
METROPOLITAN LIFE INSURANCE	DE	NELICO	SOLE STOCK	04/2003	E	Υ	N	
COMPANY ("METLIFE")			HOLDER					
METLIFE, INC.	DE	METROPOLITAN LIFE	100%	04/2000	E	Υ	Υ	
		INSURANCE COMPANY	SHAREHOLDER					

Schedi	ıle D -	Miscel	laneous

You may use the space below to explain a response to an Item or to provide any other information.

CERTAIN BOOKS AND RECORDS MAY BE HELD AT A BRANCH LOCATION IN ADDITION TO LOCATIONS NOTED IN ITEM 1.K RELATED PERSONS OF THE ADVISER THAT ARE NOT SEC-REGISTERED ALSO ACT AS GENERAL PARTNERS OF ADDITIONAL LIMITED PARTNERSHIPS AND AS MANAGING MEMBERS OF ADDITIONAL LIMITED LIABILITY COMPANIES THAT INVEST ONLY PROPRIETARY ASSETS. IF THE SEC STAFF BELIEVES THAT A LIST OF THESE ADDITIONAL LIMITED PARTNERSHIPS AND LIMITED LIABILITY COMPANIES IS NECESSARY, SUCH A LIST WILL BE PROVIDED.

DRP Pages				
CRIMINAL DISCLOSURE REF	PORTING PAGE (ADV)			
No Information Filed				
REGULATORY ACTION DISC	LOSURE REPORTING PAGE (AD	V)		
		GENERAL INSTRU	CTIONS	
This Disclosure Reporting P	Page (DRP ADV) is an 👝 INITIA	L OR • AMENDED response used	to report details for affirmative respor	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Form ADV.				
		Regulatory Act	ion	
Check item(s) being respon	nded to:			
11.C(1)	11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
☐ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	☐ 11.D(5)
☐ 11.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 11.F.	□ 11.G.			
Execution Page. One event may result in more rise to actions by more than	re than one affirmative answer to			y using one DRP. File with a completed ills related to the same event. If an event gives
PARTI				
	/(ies) for whom this DRP is being	g filed is (are):		
C You (the advisory f	irm)			
C You and one or mo	ore of your advisory affiliates			
One or more of you	advisory affiliates			
		ne full name of the <i>advisory affiliate</i> be t number. If not, indicate "non-register	•	·
ADV DRP - ADVISORY	Y AFFILIATE			

	CRD Number	: <u>2160375</u>	This advisory affiliate is $^{f C}$ a Firm $^{f C}$ an Individual	
	Registered:	⊙ Yes O No		
	Name:	STRASSLER, ARTHUR, MICHAE	;L	
		(For individuals, Last, First, Midd	le)	
	This DRP s	hould be removed from the ADV re	ecord because the advisory affiliate(s) is no longer associated with the adviser. ecord because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying esolved in the adviser's or advisory affiliate's favor.	g for
	-		curities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event stered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten you	
	☐ This DRP s	hould be removed from the ADV re	ecord because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:	
B.	-	affiliate is registered through the IAI swer is "Yes," no other information	RD system or <i>CRD</i> system, has the <i>advisory affiliate</i> submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> on this DRP must be provided.) for the
	• Yes • 1	No		
		npletion of this form does not reliev	re the advisory affiliate of its obligation to update its IARD or CRD records.	
PAR	T II Regulatory Action	on initiated by:		
1.		her Federal OState OSRO	5 Foreign	
		egulator, foreign financial regulator		
2.	Principal Sanct	ion:		
	Other Sanctions	S:		
3.	Date Initiated (M	IM/DD/YYYY):		
	C Exact C	•		
	If not exact, pro	vide explanation:		
4.	Docket/Case N	lumber:		
5.	Advisory Affiliat	te Employing Firm when activity occ	curred which led to the regulatory action (if applicable):	
6.	Principal Produ	ct Type:		
	Other Product T	ypes:		
7.	Describe the al	legations related to this regulatory	action (your response must fit within the space provided):	
8.	Current Status?	C Pending C On Appeal	C Final	
9.	If on appeal, re	gulatory action appealed to (SEC,	SRO, Federal or State Court) and Date Appeal Filed:	
If F	inal or On Appea	al, complete all items below. For Pe	ending Actions, complete Item 13 only.	
10.	How was matte	er resolved:		
11.	Resolution Date	(MM/DD/YYYY):		
	C Exact C	Explanation		
	If not exact, pro	vide explanation:		
12	Resolution Det	ail·		
14.		of the following Sanctions Ordered	d (check all appropriate items)?	
	-	_	r (uneuk all appropriate items):	
		tary/Fine Amount: \$ cation/Expulsion/Denial	☐ Disgorgement/Restitution	
	☐ Cens	·	☐ Cease and Desist/Injunction	
1			= 00000 and 00000 injunction	

	ſ	Bar	ſ	Suspension	
	B. O	her Sanctions Ordered:			
	Pi co	anction detail: if suspended, enjoined or barred incipal, etc.). If requalification by exam/retrainin andition has been satisfied. If disposition resulte ou or an advisory affiliate date paid and if any po	ng was a condition of the sanction, pro- ed in a fine, penalty, restitution, disgo	vide length of time given to requalify/	retrain, type of exam required and whether
13.	Provide provide	a brief summary of details related to the action d).	n status and (or) disposition and inclu	de relevant terms, conditions and da	tes (your response must fit within the space
			GENERAL INSTRU		
	Disclosu	_	NL OR	o report details for affirmative respor	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
			Regulatory Acti	on	
	-	b) being responded to:	_	_	_
	1.C(1)	□ 11.C(2)	□ 11.C(3)	☐ 11.C(4)	□ 11.C(5)
\square 1	1.D(1)	☐ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)
1	1.E(1)	□ 11.E(2)	□ 11.E(3)	☐ 11.E(4)	
□ 1	1.F.	☐ 11.G.			
Exec One	ution Pa	ate DRP for each event or <i>proceeding</i> . The sar ge. ay result in more than one affirmative answer to s by more than one regulator, provide details to	o Items 11.C., 11.D., 11.E., 11.F. or 11	·	
PAR	ГΙ				
A.	The per	son(s) or entity(ies) for whom this DRP is being	g filed is (are):		
	O You	(the advisory firm)			
		and one or more of your advisory affiliates			
	⊙ One	or more of your advisory affiliates			
		RP is being filed for an <i>advisory affiliate</i> , give the livisory affiliate has a CRD number, provide that		•	·
	ADV D	RP - ADVISORY AFFILIATE			
	CRD	4095	This advisory affiliate is $^{f G}$ a Firm $^{f C}$	an Individual	
	Numb				
	, rogio	tered: • Yes C No			
	Name				
		COMPANY (For individuals, Last, First, Middle)			
		s DRP should be removed from the ADV records S DRP should be removed from the ADV record			
		stration with the SEC and the event was resolv			(2) the adviser is registered or applying for
	-	re registered or registering with a <i>state securiti</i> ed more than ten years ago. If you are registere			
	☐ This	S DRP should be removed from the ADV record	because it was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
B.		Ivisory affiliate is registered through the IARD s If the answer is "Yes," no other information on t		ory affiliate submitted a DRP (with Fo	rm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	• Yes	s C No			
	NOTE:	The completion of this form does not relieve the	e advisory affiliate of its obligation to u	pdate its IARD or <i>CRD</i> records.	

PAR	ΤII				
1.	Regulatory Action initiated	d by: al O ^{State} O SRO O Fo	preign		
			uthority, federal, state, or SRO)		
2.	Principal Sanction:				
	Other Sanctions:				
3.	Date Initiated (MM/DD/YY	YY):			
	C Exact C Explanati If not exact, provide expla				
4.	Docket/Case Number:				
5.	Advisory Affiliate Employ	ing Firm when activity occurre	ed which led to the regulatory action (if applicable):	
6.	Principal Product Type:				
	Other Product Types:				
7.	Describe the allegations	related to this regulatory action	ion (your response must fit within the	space provided):	
8.	Current Status? C P	Pending C On Appeal C	◯ Final		
9.	If on appeal, regulatory a	ction appealed to (SEC, SRO), Federal or State Court) and Date Ap	ppeal Filed:	
lf Fi	inal or On Appeal, complet	te all items below. For Pendir	ng Actions, complete Item 13 only.		
10.	How was matter resolved	d:			
11.	Resolution Date (MM/DD/	YYYY):			
	C Exact C Explanati	ion			
	If not exact, provide expla				
12.	Resolution Detail:				
		lowing Constians Ordered (ab	and all appropriate items)?		
		lowing Sanctions <i>Ordered</i> (ch	ieck all appropriate items)?		
	Monetary/Fine				
	Revocation/Exp	oulsion/Denial		☐ Disgorgement/Restitution	
	Censure			Cease and Desist/Injunction	
	Bar			☐ Suspension	
	B. Other Sanctions Or	dered:			
	Principal, etc.). If recondition has been	qualification by exam/retrainir	ng was a condition of the sanction, prited in a fine, penalty, restitution, disg	ovide length of time given to requalify	Securities Principal, Financial Operations //retrain, type of exam required and whether n, provide total amount, portion levied against
13.	Provide a brief summary provided).	of details related to the actio	on status and (or) disposition and incl	ude relevant terms, conditions and c	dates (your response must fit within the space
T 1. '	Disales III ()	(DDD ADV)	GENERAL INSTRU		
	Disclosure Reporting Pag orm ADV.	je (ukt auv) is an 💍 initia	OR AIVIENDED response used	το report details for affirmative respo	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
			Regulatory Ad	tion	
Che	ck item(s) being responde	ed to:	Regulatory Ac	UUII	
	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	1.D(1)	□ 11.C(2)	☐ 11.D(3)	☑ 11.D(4)	□ 11.D(5)
					□ H.D(5)
1 1	1.E(1)	□ 11.E(2)	☐ 11.E(3)	☐ 11.E(4)	

□ 1	1.F. □ 11.G.
Exec	a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed cution Page.
	event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives to actions by more than one regulator, provide details to each action on a separate DRP.
D 4 D	
PAR	
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): O You (the advisory firm)
	C You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	CRD 4095 Number: This advisory affiliate is
	Registered: • Yes O No
	Name: METROPOLITAN LIFE INSURANCE COMPANY
	(For individuals, Last, First, Middle)
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	● Yes ○ No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	T II
1.	Regulatory Action initiated by:
	C SEC Other Federal O State O SRO O Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)
2.	Principal Sanction:
	Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	C Exact C Explanation
	If not exact, provide explanation:
4.	Docket/Case Number:
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type:
	Other Product Types:

8.	Curre	ent Status? C Pendi	ng C On Appeal C	Final		
9.	If on	appeal, regulatory action	appealed to (SEC, SRO, F	Federal or State Court) and Date Appe	eal Filed:	
lf Fi	nal or	On Appeal, complete all	items below. For Pending	Actions, complete Item 13 only.		
10.	How	was matter resolved:				
11.	Reso	olution Date (MM/DD/YYY	Y):			
	O E	Exact C Explanation				
	If not	exact, provide explanation	on:			
12.	Reso	olution Detail:				
	A.	Were any of the followin	g Sanctions Ordered (chec	ck all appropriate items)?		
		☐ Monetary/Fine Amou	unt: \$			
		Revocation/Expulsion	on/Denial		Disgorgement/Restitution	
		Censure			Cease and Desist/Injunction	
		☐ Bar			Suspension	
	B.	Other Sanctions Ordere	d:			
13.	Provi	Principal, etc.). If requali condition has been satis you or an advisory affilia	fication by exam/retraining sfied. If disposition resulted to the date paid and if any port	was a condition of the sanction, providin a fine, penalty, restitution, disgorgation of penalty was waived:	de length of time given to requalify/gement or monetary compensation,	retrain, type of exam required and whether provide total amount, portion levied against ates (your response must fit within the space
	provi	ded).				
	provi	ded).				
	provi	ded).		OENEDAL MOTOLIO	TIONS	
This			RP ADV) is an 😞 INITIAI	GENERAL INSTRUC		oses to Items 11 C 11 D 11 F 11 F or 11 G
		osure Reporting Page (D	RP ADV) is an _O INITIAL			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
	Disclo	osure Reporting Page (D	RP ADV) is an 🁩 INITIAL		report details for affirmative respor	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	Disclo	osure Reporting Page (D		OR AMENDED response used to	report details for affirmative respor	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	Disclo	osure Reporting Page (D DV. n(s) being responded to:		OR AMENDED response used to	report details for affirmative respor	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	Disclorm AD	osure Reporting Page (D DV. n(s) being responded to:		OR AMENDED response used to Regulatory Actio	report details for affirmative respor	
Chec	Disclorm AD	osure Reporting Page (D DV. n(s) being responded to:	□ 11.C(2)	OR ● AMENDED response used to Regulatory Actio	report details for affirmative respon	□ 11.C(5)
Chec	Disclorm AD	osure Reporting Page (D DV. n(s) being responded to:	☐ 11.C(2) ☐ 11.D(2)	Regulatory Action	report details for affirmative response	□ 11.C(5)
Chec	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution event o actio	osure Reporting Page (DOV. n(s) being responded to:))) arate DRP for each even Page. may result in more than	☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. t or <i>proceeding</i> . The same	Regulatory Actio 11.C(3) 11.D(3) 11.E(3)	n 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entit	□ 11.C(5)
Checo 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution event o actio	osure Reporting Page (DOV. n(s) being responded to:))) arate DRP for each even Page. may result in more than ons by more than one result in more result in more result in more result in more than one result in more result in more result in more than one result in the more than one	☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. t or <i>proceeding</i> . The same one affirmative answer to I gulator, provide details to e	Regulatory Action 11.C(3) 11.D(3) 11.E(3) 11.E(3) Resolved in the second of the s	n 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entit	☐ 11.C(5) ☐ 11.D(5) y using one DRP. File with a completed
Checo 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution event o action	osure Reporting Page (DOV. n(s) being responded to:))) arate DRP for each event Page. may result in more than ons by more than one response of the page.	☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. t or <i>proceeding</i> . The same	Regulatory Action 11.C(3) 11.D(3) 11.E(3) 11.E(3) Resolved in the second of the s	n 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entit	☐ 11.C(5) ☐ 11.D(5) y using one DRP. File with a completed
Checo 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution condition The p	osure Reporting Page (DOV. on(s) being responded to:))) arate DRP for each event Page. may result in more than ons by more than one re- person(s) or entity(ies) for fou (the advisory firm)	☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. t or <i>proceeding</i> . The same one affirmative answer to I gulator, provide details to ear whom this DRP is being for whom this DRP is being for whom the provide details to ear whom the provide details	Regulatory Action 11.C(3) 11.D(3) 11.E(3) 11.E(3) Resolved in the second of the s	n 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entit	☐ 11.C(5) ☐ 11.D(5) y using one DRP. File with a completed
Checo 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution condition o action The p	posure Reporting Page (Do). In(s) being responded to:)) arate DRP for each event Page. may result in more than one by more than one respond to the properties of the prope	☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. It or <i>proceeding</i> . The same one affirmative answer to I gulator, provide details to each of the same of the s	Regulatory Action 11.C(3) 11.D(3) 11.E(3) 11.E(3) Resolved in the second of the s	n 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entit	☐ 11.C(5) ☐ 11.D(5) y using one DRP. File with a completed
Checo 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution event o action The p Y Y O If this	posure Reporting Page (Dov. In(s) being responded to:))) arate DRP for each even Page. may result in more than ons by more than one response to the advisory firm) fou and one or more of your advises DRP is being filed for an	☐ 11.C(2) ☐ 11.D(2) ☐ 11.E(2) ☐ 11.G. It or proceeding. The same one affirmative answer to I gulator, provide details to ear whom this DRP is being for whom this DRP is being for advisory affiliates ory affiliates In advisory affiliate, give the	Regulatory Action 11.C(3) 11.D(3) 11.E(3) e event or <i>proceeding</i> may be reported litems 11.C., 11.D., 11.E., 11.F. or 11.0 each action on a separate DRP. filed is (are):	report details for affirmative response. 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entite. G. Use only one DRP to report details one of the content of t	☐ 11.C(5) ☐ 11.D(5) Ty using one DRP. File with a completed sills related to the same event. If an event gives to name, Middle name).
Checo 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Disclorm AD ck item 1.C(1 1.D(1 1.E(1) 1.F. a sepa ution event o action The Y Y O If this If the	posure Reporting Page (Dov. In(s) being responded to:))) arate DRP for each even Page. may result in more than ons by more than one response to the advisory firm) fou and one or more of your advises DRP is being filed for an	□ 11.C(2) □ 11.D(2) □ 11.E(2) □ 11.G. It or proceeding. The same one affirmative answer to I gulator, provide details to ear whom this DRP is being for whom this DRP is being for advisory affiliates ory affiliates In advisory affiliate, give the CRD number, provide that research.	Regulatory Action 11.C(3) 11.D(3) 11.E(3) e event or <i>proceeding</i> may be reported litems 11.C., 11.D., 11.E., 11.F. or 11.6 each action on a separate DRP.	report details for affirmative response. 11.C(4) 11.D(4) 11.E(4) d for more than one <i>person</i> or entite. G. Use only one DRP to report details one of the content of t	☐ 11.C(5) ☐ 11.D(5) Ty using one DRP. File with a completed sills related to the same event. If an event gives to name, Middle name).

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

	CRD Number:	4095		This advisory affiliate is . a Fi	rm 🏻 an Individual					
	Registered:	@ v .	3							
	Name:	res	→ No DLITAN LIFE INSURANCE							
		COMPANY								
		(For indivi	duals, Last, First, Middle)							
	This DRP	should be	removed from the ADV recor	rd because the <i>advisory affiliate(</i> rd because: (1) the event or <i>proc</i> olved in the adviser's or <i>advisory</i> a	eeding occurred more tha		viser is registered or applying for			
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.									
	☐ This DRP	should be	removed from the ADV recor	rd because it was filed in error, s	uch as due to a clerical or	r data-entry mistake. Explain	the circumstances:			
3.	· · · · · · · · · · · · · · · · · · ·		-	system or <i>CRD</i> system, has the this DRP must be provided.	advisory affiliate submitte	ed a DRP (with Form ADV, BD	O or U-4) to the IARD or <i>CRD</i> for the	,		
	• Yes •	No								
	NOTE: The co	mpletion o	this form does not relieve th	ne <i>advisory affiliate</i> of its obligation	on to update its IARD or C	CRD records.				
AR [*]										
۱.	Regulatory Ac		d by: ^{al} O ^{State} O <i>SRO</i> O ^{Fo}	oreign						
				uthority, federal, state, or SRO)						
2.	Principal Sand	ction:								
	Other Sanctio	ns:								
3.	Date Initiated (MM/DD/YY	YY):							
		C Exact C Explanation If not exact, provide explanation:								
1.	Docket/Case	·								
=	Advisory Affili	ata Employ	ing Firm when activity occurr	red which led to the regulatory ac	etion (if applicable):					
	·		ing I iiii when activity occur	ed willow led to the regulatory at	лоп (п аррпсаые).					
6.	Principal Prod	luct Type:								
	Other Product	Types:								
7.	Describe the a	allegations	related to this regulatory act	tion (your response must fit withi	n the space provided):					
3.	Current Status	s? O F	ending On Appeal	C Final						
9.	If on appeal, r	egulatory a	ction appealed to (SEC, SR0	O, Federal or State Court) and Da	ate Appeal Filed:					
f Fi	nal or On Appe	eal, comple	e all items below. For Pendi	ing Actions, complete Item 13 on	ly.					
10.	How was mat	ter resolve	d:							
11.	Resolution Da	te (MM/DD/	YYYY):							
	C Exact C	-								
	If not exact, pr	ovide expla	nation:							
12.	Resolution De	etail:								
	A. Were an	y of the fol	owing Sanctions Ordered (ch	heck all appropriate items)?						
	☐ Mon	etary/Fine	Amount: \$							

☐ Disgorgement/Restitution

Revocation/Expulsion/Denial

	Censure		Cease and Desist/Injunction					
	Bar		Suspension					
B. Otl	her Sanctions Ordered:							
Pri coi	ncipal, etc.). If requalification by exam/ret		de length of time given to requalify					
	Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).							
		GENERAL INSTRUC	TIONS					
his Disclosu	re Reporting Page (DRP ADV) is an $_{f C}$ I	NITIAL OR • AMENDED response used to	report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.				
f Form ADV.								
N 1 1 1 1 1 1 1		Regulatory Action	1					
	being responded to:	-	-	5				
☑ 11.C(1)	☑ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)				
11.D(1)	□ 11.D(2) 	☐ 11.D(3)	11.D(4)	□ 11.D(5)				
11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)					
□ 11.F.	☐ 11.G.							
xecution Pag	ge.			ty using one DRP. File with a completed ails related to the same event. If an event gives				
ART I								
	son(s) or entity(ies) for whom this DRP is	being filed is (are):						
· ·	(the advisory firm)	•						
~								
	and one or more of your advisory affiliate	s						
One	or more of your advisory affiliates							
	-	give the full name of the <i>advisory affiliate</i> belo e that number. If not, indicate "non-registered	•	•				
ADV DF	RP - ADVISORY AFFILIATE							
CRD	Number: <u>2170204</u>	This advisory affiliate is $^{f C}$ a Firm $^{f C}$	on Individual					
Regist	ered:	This advisory anniate is \sim a Firm \sim	an muividuai					
	Yes V No							
Name:	CLARKIN, PAUL, KIERNAN (For individuals, Last, First, Midd	dle)						
☐ This regis	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor. If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.							
occurre								
This	DRP should be removed from the ADV r	ecord because it was filed in error, such as c	ue to a clerical or data-entry mista	ake. Explain the circumstances:				
B. If the <i>ad</i> event? If	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the							
• Yes	C No							
NOTE: 1	The completion of this form does not relie	ve the advisory affiliate of its obligation to upo	date its IARD or <i>CRD</i> records.					

PART II							
1. Re	egulatory Action initiated by SEC Other Federal		oreign				
			thority, federal, state, or SRO)				
2. Pr	rincipal Sanction:						
Ot	ther Sanctions:						
3. Da	ate Initiated (MM/DD/YYYY):	:					
	Exact Explanation Explanation exact, provide explanation	ion:					
4. Do	ocket/Case Number:						
5. Ad	dvisory Affiliate Employing	Firm when activity occurre	ed which led to the regulatory action (if applicable):			
6. Pr	rincipal Product Type:						
Ot	ther Product Types:						
7. De	escribe the allegations rela	ited to this regulatory action	on (your response must fit within the	space provided):			
8. Cı	urrent Status? C Pend	ding On Appeal O	Final				
9. If (on appeal, regulatory actio	n appealed to (SEC, SRO	, Federal or State Court) and Date Ap	ppeal Filed:			
If Final	or On Appeal, complete a	II items below. For Pendin	ng Actions, complete Item 13 only.				
10. Ho	ow was matter resolved:						
11. Re	esolution Date (MM/DD/YY)	/Y):					
C Exact C Explanation							
lf r	not exact, provide explanati	ion:					
12. Re	esolution Detail:						
Δ	Were any of the following	ng Sanctions Ordered (ch	eck all appropriate items)?				
,,			con an appropriate items):				
	Monetary/Fine Amo			□			
	Revocation/Expuls	ion/Denial		Disgorgement/Restitution			
	☐ Censure		Cease and Desist/Injunction				
5	☐ Bar	,		Suspension			
В	B. Other Sanctions Ordered: Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate date paid and if any portion of penalty was waived:						
	ovide a brief summary of o	details related to the action	n status and (or) disposition and inclu	ude relevant terms, conditions and c	dates (your response must fit within the space		
This Dis	polocura Danastina Daga (F	DDD ADVV is on INITIV	GENERAL INSTRU		onese to Itama 11 C		
of Form		ALL MON) IS AU C INITIA	OR C AINICINDED response used	to report details for animilative response	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.		
			Regulatory Ac	tion			
Check i	tem(s) being responded to):	9				
1 11.0	· · · · · · · · · · · · · · · · · · ·	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)		
☑ 11.□	D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)		
□ 11.E		□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	. ,		

□ 1	1.F. □ 11.G.								
Exec	Use a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File with a completed execution Page.								
	event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives to actions by more than one regulator, provide details to each action on a separate DRP.								
D 4 D									
PAR									
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): O You (the advisory firm)								
	C You and one or more of your advisory affiliates								
	One or more of your advisory affiliates								
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.								
	ADV DRP - ADVISORY AFFILIATE								
	CRD 4095 Number: This advisory affiliate is								
	Registered: • Yes O No								
	Name: METROPOLITAN LIFE INSURANCE COMPANY								
	(For individuals, Last, First, Middle)								
	☐ This DRP should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.								
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.								
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:								
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.								
	● Yes ○ No								
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.								
PAR	T II								
1.	Regulatory Action initiated by:								
	C SEC Other Federal O State O SRO O Foreign								
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)								
2.	Principal Sanction:								
	Other Sanctions:								
3.	Date Initiated (MM/DD/YYYY):								
	C Exact C Explanation								
	If not exact, provide explanation:								
4.	Docket/Case Number:								
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):								
6.	Principal Product Type:								
	Other Product Types:								

8.	8. Current Status? C Pending C On Appeal C Final					
9.	If on appeal, regu	latory action appealed to (SEC, SRO,	Federal or State Court) and Date Ap	peal Filed:		
lf Fi	inal or On Appeal,	complete all items below. For Pending	g Actions, complete Item 13 only.			
10.	How was matter	resolved:				
11.	Resolution Date (I	MM/DD/YYYY):				
	C Exact C E	xplanation				
	If not exact, provid	de explanation:				
12.	Resolution Detai	l:				
	A. Were any of	f the following Sanctions Ordered (che	eck all appropriate items)?			
	■ Moneta	ry/Fine Amount: \$				
	Revoca	ition/Expulsion/Denial	1	Disgorgement/Restitution		
	Censur	re	1	Cease and Desist/Injunction		
	☐ Bar		ı	Suspension		
		tions Ordered:				
13.	condition ha	as been satisfied. If disposition resulte dvisory affiliate date paid and if any po	ed in a fine, penalty, restitution, disgo rtion of penalty was waived:	rgement or monetary compensation	retrain, type of exam required and whether , provide total amount, portion levied against ates (your response must fit within the space	
			OENEDA MOTOU	OT/ONE		
This	Disclosure Report	ting Page (DRP ADV) is an 🧸 INITIAI	GENERAL INSTRU L AMENDED response used		nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.	
	orm ADV.		OR ®			
			Regulatory Act	ion		
Che	ck item(s) being re	esponded to:				
	1.C(1)	☐ 11.C(2)	□ 11.C(3)	□ 11.C(4)	11.C(5)	
	1.D(1)	☐ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)	
	1.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)		
	1.F.	☐ 11.G.				
Exec	event may result it actions by more		Items 11.C., 11.D., 11.E., 11.F. or 1		ty using one DRP. File with a completed ails related to the same event. If an event gives	
A.	A. The <i>person(s)</i> or entity(ies) for whom this DRP is being filed is (are):					
	You (the advisory firm)					
	-	or more of your advisory affiliates				
		of your advisory affiliates				
	If this DRP is beir	ng filed for an <i>advisory affiliate</i> , give th <i>iliat</i> e has a <i>CRD</i> number, provide that		•	•	
	ADV DRP - ADVI	SORY AFFILIATE				
	, 12 1 2 1 1 1 1 2 1 1					

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

	CRD Number:	4095		This advisory affiliate is • a Fi	rm C an Individual			
		@ v .	O					
		res	○ No DLITAN LIFE INSURANCE					
		COMPANY						
		(For indivi	duals, Last, First, Middle)					
	This DRP	should be	removed from the ADV recor	rd because the advisory affiliate(rd because: (1) the event or procled in the adviser's or advisory a	eeding occurred more that		dviser is registered or applying for	
				ities authority , you may remove a red or registering with the SEC, y	-		em 11.D(4), and only if that event that occurred more than ten years	
	☐ This DRP	should be	removed from the ADV recor	rd because it was filed in error, s	uch as due to a clerical o	or data-entry mistake. Explain	the circumstances:	
3.	-		-	system or <i>CRD</i> system, has the this DRP must be provided.	advisory affiliate submitte	ed a DRP (with Form ADV, Bl	D or U-4) to the IARD or <i>CRD</i> for the	,
	⊙ Yes ○	No						
	NOTE: The co	mpletion o	f this form does not relieve th	he <i>advisory affiliate</i> of its obligation	on to update its IARD or (CRD records.		
AR'								
۱.	Regulatory Ac		d by: ^{al} C ^{State} C <i>SRO</i> C ^F	oreign				
				outhority, federal, state, or SRO)				
2.	Principal Sand	ction:						
	Other Sanctio	ns:						
3.	Date Initiated (MM/DD/YY	YY):					
	C Exact C	•						
1.	Docket/Case	Number:						
5.	Advisory Affilia	<i>at</i> e Employ	ing Firm when activity occuri	red which led to the regulatory ac	ction (if applicable):			
6.	Principal Prod	luct Type:						
	Other Product	Types:						
7.	Describe the a	allegations	related to this regulatory act	tion (your response must fit withi	n the space provided):			
3.	Current Status	s? O F	Pending On Appeal	C Final				
Э.	If on appeal, r	egulatory a	ction appealed to (SEC, <i>SR</i> 0	O, Federal or State Court) and Da	ate Appeal Filed:			
f Fi	nal or On Appe	eal, comple	te all items below. For Pendi	ing Actions, complete Item 13 on	ly.			
10.	How was mat	ter resolve	d:					
11.	Resolution Da	te (MM/DD/	YYYY):					
	C Exact C	-						
	If not exact, pr	ovide expla	anation:					
12.	Resolution De	etail:						
	A. Were an	y of the fol	owing Sanctions Ordered (cl	heck all appropriate items)?				
	☐ Mon	etary/Fine	Amount: \$					

☐ Disgorgement/Restitution

Revocation/Expulsion/Denial

	L Ce	nsure	L	Cease and Desist/Injunction	
	Ba	r	Ε	Suspension	
	P Other S	Canatiana Ordarad			
	B. Other S	Sanctions Ordered:			
	Principa conditio		ing was a condition of the sanction, provided in a fine, penalty, restitution, disgor	ide length of time given to requalify	ecurities Principal, Financial Operations /retrain, type of exam required and whether , provide total amount, portion levied against
13.	Provide a bri	ef summary of details related to the action	on status and (or) disposition and includ	de relevant terms, conditions and da	ates (your response must fit within the space
	provided).				
	Disals and D	ANTI-	GENERAL INSTRUC		
his	Disclosure Re	eporting Page (DRP ADV) is an 👝 INITI	OR	o report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
f Fc	orm ADV.				
			Regulatory Action	on	
he	ck item(s) bei	ng responded to:	•		
	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
			` '	. ,	
	I1.D(1)	☐ 11.D(2) —	□ 11.D(3) 	▼ 11.D(4)	□ 11.D(5)
1	11.E(1)	☐ 11.E(2)	☐ 11.E(3)	□ 11.E(4)	
<u> </u>	11.F.	□ 11.G.			
lse	a separate DE	RP for each event or <i>proceeding</i> . The sa	ame event or <i>proceeding</i> may be report	ed for more than one <i>person</i> or enti	ty using one DRP. File with a completed
	cution Page.	the reading of the early	and even er proceedang may be reper-		, some one 2.1. I no min a completion
,,,,,	Janen i ago.				
)ne	event may re	sult in more than one affirmative answer	to Items 11 C 11 D 11 F 11 F or 11	G. Use only one DRP to report deta	ails related to the same event. If an event gives
	-	more than one regulator, provide details t		.o. Ose only one Divinto report deta	and related to the same event. If an event gives
30 1	to actions by i	note than one regulator, provide details t	to each action on a separate DIVI.		
'AR	TI				
		- \ - a - a titu /i - a \ fan ook - aa tiki- DDD is he in	(!) !- /)-		
A.		s) or entity(ies) for whom this DRP is beir	ng filed is (are):		
	C You (the	advisory firm)			
	- Vou and	one or more of your			
	C Tou and	one or more of your advisory affiliates			
	One or m	ore of your <i>advisory affiliate</i> s			
	·	advisory affiliates			
	If this DRP is	being filed for an advisory affiliate, give	the full name of the advisory affiliate be	low (for individuals, Last name, Firs	st name, Middle name).
	If the advisor	y affiliate has a CRD number, provide that	at number. If not, indicate "non-registere	ed" by checking the appropriate box	
		•			
	ADV DRP - A	ADVISORY AFFILIATE			
	ADV DIXI - A	ADVISORY ALTIEIATE			
	CRD	4095			
	Number:	4000	This advisory affiliate is 💿 a Firm 🔘	an Individual	
	Registered	: ⊙ Yes C No			
	Name:	METROPOLITAN LIFE INSURANCE			
		COMPANY			
		(For individuals, Last, First, Middle)			
		(1 01 111011100010)			
		should be removed from the ADV recor			
	This DRF	P should be removed from the ADV recor	rd because: (1) the event or proceeding	occurred more than ten years ago	or (2) the adviser is registered or applying for
	registrati	on with the SEC and the event was resol	ved in the adviser's or advisory affiliate	's favor.	
	If you are re	gistered or registering with a state securi	ities authority , you may remove a DRP f	or an event you reported only in res	ponse to Item 11.D(4), and only if that event
	occurred mo	re than ten years ago. If you are register	ed or registering with the SEC, you may	remove a DRP for any event listed	in Item 11 that occurred more than ten years
	ago.			·	·
	J				
	☐ This DRF	should be removed from the ADV recor	rd because it was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
				The state of the s	
В.				ry affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	event? If the	answer is "Yes," no other information on	this DRP must be provided.		
	A				
	⊙ Yes C	No			

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART	ГШ				
	Regulatory Action initiated by:		preign		
			uthority, federal, state, or SRO)		
2.	Principal Sanction:				
	Other Sanctions:				
3.	Date Initiated (MM/DD/YYYY):				
	C Exact C Explanation If not exact, provide explanation	on:			
4.	Docket/Case Number:				
5.	Advisory Affiliate Employing F	Firm when activity occurre	ed which led to the regulatory action (i	applicable):	
6.	Principal Product Type:				
	Other Product Types:				
7.	Describe the allegations relat	ed to this regulatory action	on (your response must fit within the s	pace provided):	
8.	Current Status? C Pendi	ing O On Appeal	5 Final		
9.	If on appeal, regulatory action	appealed to (SEC, SRO), Federal or State Court) and Date Ap	peal Filed:	
If Fir	nal or On Appeal, complete all	litems below. For Pendin	ng Actions, complete Item 13 only.		
10.	How was matter resolved:				
11.	Resolution Date (MM/DD/YYY	Y):			
	C Exact C Explanation If not exact, provide explanation	on:			
12.	Resolution Detail:				
	A. Were any of the followin	g Sanctions <i>Ordered</i> (ch	neck all appropriate items)?		
	☐ Monetary/Fine Amou		, ,		
	Revocation/Expulsion			Disgorgement/Restitution	
	Censure	on, bornar		Cease and Desist/Injunction	
	☐ Bar			Suspension	
			•	_ Suspension	
	Sanction detail: if suspe Principal, etc.). If requali condition has been satis	ended, <i>enjoined</i> or barred ification by exam/retrainin sfied. If disposition result	ng was a condition of the sanction, pro	vide length of time given to requalify	Securities Principal, Financial Operations y/retrain, type of exam required and whether n, provide total amount, portion levied against
	Provide a brief summary of deprovided).	etails related to the actio	on status and (or) disposition and inclu	de relevant terms, conditions and c	dates (your response must fit within the space
			OFNED (1 (1) 0 T = 1)	OTIONS	
This	Disclosure Reporting Page (D	RP ADV) is an 👝 INITIA	GENERAL INSTRU AL AL AL AMENDED response used		onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
	rm ADV.		UR ·		
			Regulatory Act	on	
	k item(s) being responded to		—	—	
	1.C(1)	11.C(2)	□ 11.C(3)	☐ 11.C(4)	11.C(5)
1 1	1.D(1)	☑ 11.D(2)	☐ 11.D(3)	□ 11.D(4)	☐ 11.D(5)

1 1	11.E(1)	☐ 11.E(2)	■ 11.E(3)	□ 11.E(4)	
□ 1	11.F.	□ 11.G.			
		RP for each event or <i>proceeding</i> . The	same event or <i>proceeding</i> may be reported	for more than one <i>person</i> or entity using one DRP. File with	ı a completed
One	-	sult in more than one affirmative answe		. Use only one DRP to report details related to the same eve	ent. If an event gives
	•	, promac actain	o to dadir dollar on a coparate 2 mil		
PAR		a) an antitudical formula and this DDD is b	sing filed in (analy		
A.		s) or entity(ies) for whom this DRP is be	eing filed is (are):		
	~	advisory firm)			
	C You and o	one or more of your advisory affiliates			
	⊙ One or me	ore of your advisory affiliates			
			re the full name of the advisory affiliate belothet that number. If not, indicate "non-registered	v (for individuals, Last name, First name, Middle name). by checking the appropriate box.	
	ADV DRP - A	ADVISORY AFFILIATE			
	CRD Number:	<u>4095</u>	This advisory affiliate is © a Firm O a	n Individual	
	Registered	· • Yes O No			
	Name:	METROPOLITAN LIFE INSURANCE			
	rvaino.	COMPANY			
		(For individuals, Last, First, Middle)			
	☐ This DRF registration	P should be removed from the ADV recon with the SEC and the event was res	solved in the adviser's or advisory affiliate's	curred more than ten years ago or (2) the adviser is register	
				emove a DRP for any event listed in Item 11 that occurred mo	=
	☐ This DRF	should be removed from the ADV rec	cord because it was filed in error, such as d	e to a clerical or data-entry mistake. Explain the circumstan	ices:
B.	-	y affiliate is registered through the IARI answer is "Yes," no other information o	-	affiliate submitted a DRP (with Form ADV, BD or U-4) to the	IARD or <i>CRD</i> for the
	• Yes •	No			
	NOTE: The c	completion of this form does not relieve	the advisory affiliate of its obligation to upo	ate its IARD or <i>CRD</i> records.	
PAR	T II				
1.	-	ction initiated by:			
		Other Federal C State C SRO C			
	(Full name of	f regulator, foreign financial regulatory	authority, federal, state, or SRO)		
2.	Principal Sar	nction:			
	Other Sanction	ons:			
3.	Date Initiated	(MM/DD/YYYY):			
		Explanation provide explanation:			
4.	Docket/Case	Number:			
5.	Advisory Affil	liate Employing Firm when activity occu	urred which led to the regulatory action (if a	plicable):	
6.	Principal Pro	duct Type:			
	Other Produc	et Types:			

7.	Describe the allegations related to this regul	atory action (your response must fit within the	space provided):				
8.	3. Current Status? C Pending C On Appeal C Final						
9.	If on appeal, regulatory action appealed to (S	EEC, SRO, Federal or State Court) and Date Ap	ppeal Filed:				
lf Fi	nal or On Appeal, complete all items below. F	or Pending Actions, complete Item 13 only.					
10.	How was matter resolved:						
11.	Resolution Date (MM/DD/YYYY):						
	C Exact C Explanation						
	If not exact, provide explanation:						
12.	Resolution Detail:						
	A. Were any of the following Sanctions Or	dered (check all appropriate items)?					
	☐ Monetary/Fine Amount: \$						
	Revocation/Expulsion/Denial		☐ Disgorgement/Restitution				
	Censure		Cease and Desist/Injunction				
	☐ Bar		Suspension				
	B. Other Sanctions Ordered:						
13.	you or an <i>advisory affiliate</i> date paid an	d if any portion of penalty was waived:		n, provide total amount, portion levied against			
This	Disclosure Reporting Page (DRP ADV) is an	GENERAL INSTRU		onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.			
	orm ADV.	OR O					
		Regulatory Ac	tion				
Chec	ck item(s) being responded to:	regulatory / to	NOT				
□ 1	1.C(1)	☐ 11.C(3)	□ 11.C(4)	☐ 11.C(5)			
□ 1	1.D(1)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)			
□ 1	1.E(1) ☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)				
□ 1	1.F. □ 11.G.						
Use	a separate DRP for each event or proceeding	r. The same event or <i>proceeding</i> may be repo	rted for more than one <i>person</i> or ent	tity using one DRP. File with a completed			
	cution Page.	,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,			
	event may result in more than one affirmative to actions by more than one regulator, provide		1.G. Use only one DRP to report de	tails related to the same event. If an event gives			
PAR ⁻	ті						
A.	The <i>person(s)</i> or entity(ies) for whom this DF or You (the advisory firm)	RP is being filed is (are):					
	C You and one or more of your advisory affiliates						
	• One or more of your advisory affiliates	mates					
	If this DRP is being filed for an advisory affili	ate, give the full name of the advisory affiliate booting to the following that number. If not, indicate "non-registed by the following that number.		·			
	P						

	CRD Number:	<u>17580</u>		This advisory affiliate is 🌀 a Fi	rm C an Individual		
	Registered:	Yes	C No				
	Name:		TREET RESEARCH				
			MENT SERVICES, INC. viduals, Last, First, Middle	e)			
	This DRP	should be	a removed from the ADV	record because the advisory affiliate(s) is no longer associated	with the adviser	,
	This DRP	should be	e removed from the ADV	record because the advisory annual record because: (1) the event or proc resolved in the adviser's or advisory a	eeding occurred more than		ser is registered or applying for
			-	ecurities authority , you may remove a gistered or registering with the SEC, y		-	
	☐ This DRP	should be	e removed from the ADV	record because it was filed in error, s	uch as due to a clerical or	data-entry mistake. Explain th	ne circumstances:
3.	-		•	ARD system or <i>CRD</i> system, has the in on this DRP must be provided.	advisory affiliate submitte	d a DRP (with Form ADV, BD	or U-4) to the IARD or <i>CRD</i> for the
	⊙ Yes C	No					
	NOTE: The co	mpletion	of this form does not relie	eve the advisory affiliate of its obligation	on to update its IARD or C	RD records.	
AR ⁻							
1.	Regulatory Ac		eral C State C SRO	C Foreign			
	(Full name of	regulator,	foreign financial regulate	ory authority, federal, state, or SRO)			
<u>2</u> .	Principal Sand	ction:					
	Other Sanction	ns:					
3.	Date Initiated (MM/DD/Y	YYY):				
	C Exact C	•					
1.	Docket/Case	Number:					
5.	Advisory Affilia	ate Emplo	ying Firm when activity o	ccurred which led to the regulatory ac	ction (if applicable):		
6.	Principal Prod	uct Type:					
	Other Product	Types:					
7.	Describe the a	allegation	s related to this regulator	y action (your response must fit withi	n the space provided):		
3.	Current Status	s? O	Pending C On Appea	al C Final			
9.	If on appeal, re	egulatory	action appealed to (SEC	, SRO, Federal or State Court) and Da	ate Appeal Filed:		
f Fi	nal or On Appe	eal, compl	ete all items below. For F	Pending Actions, complete Item 13 on	ly.		
10.	How was mate	ter resolv	ed:				
11.	Resolution Dat	•	•				
	C Exact C	-					
	If not exact, pr	ovide exp	lanation:				
12.	Resolution De						
				ed (check all appropriate items)?			
	Mon	etary/Fine	Amount: \$				

☐ Disgorgement/Restitution

Revocation/Expulsion/Denial

	L Censure	1	Cease and Desist/Injunction	
	☐ Bar	ſ	Suspension	
	B. Other Sanctions Ordered:			
	Sanction detail: if suspended, enjoined or barred, principal, etc.). If requalification by exam/retraining condition has been satisfied. If disposition resulted you or an advisory affiliate date paid and if any port	was a condition of the sanction, prod d in a fine, penalty, restitution, disgo	vide length of time given to requalify,	retrain, type of exam required and whether
13.	Provide a brief summary of details related to the action s	status and (or) disposition and inclu	de relevant terms, conditions and da	ates (your response must fit within the space
	provided).			
his	Disclosure Reporting Page (DRP ADV) is an O INITIAL	GENERAL INSTRU		nses to Items 11 C
	orm ADV.	OR • / IIII_ 15_5 loopelles does !	to report details for diffirmative respe	
		Regulatory Acti	ion	
he	ck item(s) being responded to:	g ,		
	11.C(1)	□ 11.C(3)	☑ 11.C(4)	☑ 11.C(5)
	11.D(1)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
				L 11.D(5)
	11.E(1)	□ 11.E(3)	☐ 11.E(4)	
1	11.F. □ 11.G.			
Jse	a separate DRP for each event or <i>proceeding</i> . The same	e event or <i>proceeding</i> may be report	ted for more than one <i>person</i> or enti	ty using one DRP. File with a completed
xec	cution Page.			
	event may result in more than one affirmative answer to I to actions by more than one regulator, provide details to e		1.G. Use only one DRP to report deta	ails related to the same event. If an event gives
AR	eT I			
A.	The person(s) or entity(ies) for whom this DRP is being f	filed is (are):		
	You (the advisory firm)			
	~			
	C You and one or more of your advisory affiliates			
	One or more of your advisory affiliates			
	If this DRP is being filed for an advisory affiliate, give the If the advisory affiliate has a CRD number, provide that r		•	•
	ADV DRP - ADVISORY AFFILIATE			
	CRD 4095	nis advisory affiliate is . a Firm	1	
	Number:	ils advisory amiliate is 👻 a Firm 🔍	an individual	
	Registered: • Yes O No			
	Name: METROPOLITAN LIFE INSURANCE			
	COMPANY (For individuals, Last, First, Middle)			
	 This DRP should be removed from the ADV record be This DRP should be removed from the ADV record be registration with the SEC and the event was resolved 	pecause: (1) the event or proceeding	g occurred more than ten years ago	
	If you are registered or registering with a <i>state securities</i> occurred more than ten years ago. If you are registered ago.			•
	☐ This DRP should be removed from the ADV record b	pecause it was filed in error, such as	s due to a clerical or data-entry mista	ike. Explain the circumstances:
В.	If the advisory affiliate is registered through the IARD systement? If the answer is "Yes," no other information on this	-	ory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	⊙ Yes ○ No			

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PAR	TII				
1.	Regulatory Action initiated by SEC Other Federal		reign		
			thority, federal, state, or SRO)		
2.	Principal Sanction:				
	Other Sanctions:				
3.	Date Initiated (MM/DD/YYYY)	:			
	C Exact C Explanation If not exact, provide explanat	ion:			
4.	Docket/Case Number:				
5.	Advisory Affiliate Employing	Firm when activity occurre	d which led to the regulatory action (f applicable):	
6.	Principal Product Type:				
	Other Product Types:				
7.	Describe the allegations rela	ited to this regulatory actio	on (your response must fit within the	space provided):	
8.	Current Status? C Pend	ding O On Appeal C	Final		
9.	If on appeal, regulatory actio	n appealed to (SEC, SRO,	Federal or State Court) and Date Ap	peal Filed:	
lf Fi	inal or On Appeal, complete a	Il items below. For Pending	g Actions, complete Item 13 only.		
10.	How was matter resolved:				
11.	Resolution Date (MM/DD/YYY	YY):			
	C Exact C Explanation				
	If not exact, provide explanat	ion:			
12.	Resolution Detail:				
	A. Were any of the followi	ng Sanctions Ordered (che	eck all appropriate items)?		
	☐ Monetary/Fine Amo	ount: \$			
	Revocation/Expuls	sion/Denial		☐ Disgorgement/Restitution	
	Censure			Cease and Desist/Injunction	
	☐ Bar			Suspension	
	B. Other Sanctions Order	ed:			
	Principal, etc.). If requa	lification by exam/retraining isfied. If disposition resulte	g was a condition of the sanction, pro	ovide length of time given to requalify/	ecurities Principal, Financial Operations retrain, type of exam required and whether provide total amount, portion levied against
13.	Provide a brief summary of oprovided).	details related to the action	n status and (or) disposition and inclu	ude relevant terms, conditions and da	ites (your response must fit within the space
			GENERAL INSTRU	ICTIONS	
	Disclosure Reporting Page (I	ORP ADV) is an 👝 INITIA			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
			Regulatory Ac	tion	
Che	ck item(s) being responded to):			
□ 1	1.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
□ 1	1.D(1)	□ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	□ 11.D(5)

1 1	11.E(1)	☐ 11.E(2)	■ 11.E(3)	□ 11.E(4)	
□ 1	11.F.	□ 11.G.			
		RP for each event or <i>proceeding</i> . The	same event or <i>proceeding</i> may be reported	for more than one <i>person</i> or entity using one DRP. File with	ı a completed
One	-	sult in more than one affirmative answe		. Use only one DRP to report details related to the same eve	ent. If an event gives
	•	, promac actain	o to dadir dollar on a coparate 2 mil		
PAR		a) an antitudical formula and this DDD is b	sing filed in (analy		
A.		s) or entity(ies) for whom this DRP is be	eing filed is (are):		
	~	advisory firm)			
	C You and o	one or more of your advisory affiliates			
	⊙ One or me	ore of your advisory affiliates			
			re the full name of the advisory affiliate belothet that number. If not, indicate "non-registered	v (for individuals, Last name, First name, Middle name). by checking the appropriate box.	
	ADV DRP - A	ADVISORY AFFILIATE			
	CRD Number:	<u>4095</u>	This advisory affiliate is © a Firm O a	n Individual	
	Registered	· • Yes O No			
	Name:	METROPOLITAN LIFE INSURANCE			
	rvaino.	COMPANY			
		(For individuals, Last, First, Middle)			
	☐ This DRF registration	P should be removed from the ADV recon with the SEC and the event was res	solved in the adviser's or advisory affiliate's	curred more than ten years ago or (2) the adviser is register	
				emove a DRP for any event listed in Item 11 that occurred mo	=
	☐ This DRF	should be removed from the ADV rec	cord because it was filed in error, such as d	e to a clerical or data-entry mistake. Explain the circumstan	ices:
B.	-	y affiliate is registered through the IARI answer is "Yes," no other information o	-	affiliate submitted a DRP (with Form ADV, BD or U-4) to the	IARD or <i>CRD</i> for the
	• Yes •	No			
	NOTE: The c	completion of this form does not relieve	the advisory affiliate of its obligation to upo	ate its IARD or <i>CRD</i> records.	
PAR	T II				
1.	-	ction initiated by:			
		Other Federal C State C SRO C			
	(Full name of	f regulator, foreign financial regulatory	authority, federal, state, or SRO)		
2.	Principal Sar	nction:			
	Other Sanction	ons:			
3.	Date Initiated	(MM/DD/YYYY):			
		Explanation provide explanation:			
4.	Docket/Case	Number:			
5.	Advisory Affil	liate Employing Firm when activity occu	urred which led to the regulatory action (if a	plicable):	
6.	Principal Pro	duct Type:			
	Other Produc	et Types:			

7.	Describe the allegations related to this regulatory action	on (your response must fit within the s	space provided):	
8.	Current Status? Pending On Appeal	Final		
9.	If on appeal, regulatory action appealed to (SEC, SRO	, Federal or State Court) and Date Ap	peal Filed:	
lf Fi	nal or On Appeal, complete all items below. For Pendin	ng Actions, complete Item 13 only.		
10.	How was matter resolved:			
11.	Resolution Date (MM/DD/YYYY):			
	C Exact C Explanation			
	If not exact, provide explanation:			
12.	Resolution Detail:			
	A. Were any of the following Sanctions Ordered (ch	eck all appropriate items)?		
	☐ Monetary/Fine Amount: \$			
	Revocation/Expulsion/Denial	1	Disgorgement/Restitution	
	☐ Censure		Cease and Desist/Injunction	
	☐ Bar	1	Suspension	
	B. Other Sanctions Ordered:			
13.	condition has been satisfied. If disposition result you or an <i>advisory affiliate</i> date paid and if any position provide a brief summary of details related to the actio provided).	ortion of penalty was waived:		
		GENERAL INSTRU	CTIONS	
	Disclosure Reporting Page (DRP ADV) is an INITIA orm ADV.	AL OR C AMENDED response used	to report details for affirmative respo	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G
Char	ck item(s) being responded to:	Regulatory Act	ion	
	1.C(1)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	1.D(1)	□ 11.D(3)	□ 11.D(4)	☐ 11.D(5)
	1.E(1)	□ 11.E(3)	□ 11.E(4)	(0)
	1.F. □ 11.G.	L 11.2(0)	(.)	
	a separate DRP for each event or <i>proceeding</i> . The sar cution Page.	me event or <i>proceeding</i> may be report	ted for more than one <i>person</i> or enti	ty using one DRP. File with a completed
	event may result in more than one affirmative answer to actions by more than one regulator, provide details to		I.G. Use only one DRP to report det	ails related to the same event. If an event gives
PAR [°]	TI			
	The person(s) or entity(ies) for whom this DRP is being	g filed is (are):		
	You (the advisory firm)	· , ,		
	O You and one or more of your advisory affiliates			
	One or more of your advisory affiliates			
	If this DRP is being filed for an advisory affiliate, give to the advisory affiliate has a CRD number, provide that		·	•
	ADV DRP - ADVISORY AFFILIATE			

No Information Filed

	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.				
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.				
	\square This DRP should be removed from the ADV record because it was filed in error, such a	as due to a clerical or data-entry mistake. Explain the circumstances:			
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.				
	C Yes C No				
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to	o update its IARD or <i>CRD</i> records.			
PAR ⁻	T II				
	Regulatory Action initiated by: O SEC Other Federal State O SRO O Foreign				
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) RHODE ISLAND DIVISION OF SECURITIES				
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions:				
3	Date Initiated (MM/DD/YYYY):				
o .	08/05/2005				
4.	Docket/Case Number:				
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action ((if applicable):			
6.	Principal Product Type: Investment Contract(s) Other Product Types:				
7.	Describe the allegations related to this regulatory action (your response must fit within the IT WAS ALLEGED THAT THE APPLICANT EMPLOYED INDIVIDUALS AS SALES REPRESE LICENSED IN THE STATE.				
8.	Current Status? C Pending C On Appeal Final				
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Ap	Appeal Filed:			
lf Fi	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.				
10.	How was matter resolved: Consent				
	Resolution Date (MM/DD/YYYY):				
	10/12/2005 Exact Explanation If not exact, provide explanation:				
12.	Resolution Detail:				
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?				
	✓ Monetary/Fine Amount: \$ 25,000.00				
	Revocation/Expulsion/Denial	☐ Disgorgement/Restitution			
	☐ Censure	☐ Cease and Desist/Injunction			
	☐ Bar	☐ Suspension			

	B. Other Sanction	s Ordered:			
	Principal, etc.). condition has t you or an <i>advis</i>	If requalification by exam/retraining	g was a condition of the sanction, providin a fine, penalty, restitution, disgo	vide length of time given to requalify/	ecurities Principal, Financial Operations retrain, type of exam required and whether provide total amount, portion levied against
		mary of details related to the action	status and (or) disposition and inclu	de relevant terms, conditions and da	ates (your response must fit within the space
provided). AS A RESULT OF AN ADMINISTRATIVE OVERSIGHT, THE APPLICANT EMPLOYED INDIVIDUALS AS SALES REPRESENTATIVES IN RHODE ISLAND, WHIL INDIVIDUALS WERE NOT PROPERLY LICENSED IN RHODE ISLAND. THE APPLICANT AGREED TO IMMEDIATELY UNDERTAKE TO COMPLY FULLY WITH RULES AND REGULATIONS AND PAID AN ADMINISTRATIVE PENALTY OF \$25000.00 TO THE DEPARTMENT.					
-	B. 1 B .:	D (DDD ADIA)	GENERAL INSTRUC		
	Disclosure Reporting rm ADV.	ı Page (DRP ADV) is an 👩 INITIAI	OR C AMENDED response used t	o report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
			Regulatory Acti	on	
Chec	k item(s) being resp	onded to:	•		
□ 1°	1.C(1)	☑ 11.C(2)	□ 11.C(3)	☑ 11.C(4)	☑ 11.C(5)
□ 1°	1.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
□ 1 ²	1.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	. ,
□ 1 ²	,	□ 11.G.	(,		
Execu	ution Page. event may result in m	, <u> </u>	Items 11.C., 11.D., 11.E., 11.F. or 11	, in the second second	y using one DRP. File with a completed ills related to the same event. If an event gives
PART	ГІ				
A.	The person(s) or ent	ity(ies) for whom this DRP is being	filed is (are):		
	You (the advisory	/ firm)			
	O You and one or r	nore of your <i>advisory affiliat</i> es			
		our advisory affiliates			
		-	e full name of the advisory affiliate be number. If not, indicate "non-register		•
	ADV DRP - ADVISO	RY AFFILIATE			
			No Information	n Filed	
	☐ This DRP should	be removed from the ADV record	because the advisory affiliate(s) is no because: (1) the event or proceeding ed in the adviser's or advisory affiliate	occurred more than ten years ago o	or (2) the adviser is registered or applying for
	•				oonse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
	☐ This DRP should	be removed from the ADV record	because it was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
		e is registered through the IARD sy is "Yes," no other information on th		ory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	C Yes C No				
	NOTE: The completi	on of this form does not relieve the	advisory affiliate of its obligation to u	pdate its IARD or <i>CRD</i> records.	
PART	ГІІ				
	Regulatory Action in	itiated by:			
SEC Other Federal O State O SRO O Foreign					

	SECURITIES AND EXCHANGE COMMISSION	
<u>2</u> .	Principal Sanction:	
	Cease and Desist	
	Other Sanctions:	INDEDENDENT CONCLUTANT
	CENSURE; DISGORGEMENT TO AFFECTED CLIENTS; RETAIN I	INDEPENDENT CONSULTANT
3.	Date Initiated (MM/DD/YYYY):	
	03/01/2003 C Exact C Explanation	
	If not exact, provide explanation:	
	IN MARCH 2003, APPLICANT SELF-REPORTED TO THE SEC THI	EIR FAILURE TO REBALANCE INVESTMENT MANAGER PROGRAM ACCOUNTS AS REPRESENTED.
1.	Docket/Case Number:	
	FILE NO. 3-12214	
_		
) .	Advisory Affiliate Employing Firm when activity occurred which led	to the regulatory action (if applicable):
ò.	Principal Product Type:	
	Investment Contract(s)	
	Other Product Types:	
7	Describe the allegations related to this regulatory action (your res	nonse must fit within the snace provided).
•		// PROGRAM") CLIENTS THAT IT WOULD REGULARLY SCREEN THEIR ACCOUNTS AND IDENTIFY
		NED WITHIN CERTAIN PREDETERMINED RANGES. IF THE PERCENTAGES DRIFTED FROM THOSE
	RANGES, APPLICANT PROMISED TO NOTIFY THE CLIENTS AND	D REBALANCE THEIR PORTFOLIOS UPON REQUEST. FROM 1995 THROUGH 2002, APPLICANT FAILED
	TO PROVIDE SUCH REBALANCING SERVICES TO A LARGE NUM	MBER OF ITS IM PROGRAM CLIENTS.
_		
3.	Current Status? Pending On Appeal Final	
€.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or	State Court) and Date Appeal Filed:
f Fi	inal or On Appeal, complete all items below. For Pending Actions, c	complete Item 13 only.
ın	How was matter resolved:	
0.	Order	
11.	Resolution Date (MM/DD/YYYY):	
	02/21/2006 © Exact C Explanation	
	If not exact, provide explanation:	
2.	Resolution Detail:	
	A. Were any of the following Sanctions <i>Ordered</i> (check all appro	opriate items)?
	Revocation/Expulsion/Denial	✓ Disgorgement/Restitution
	Censure	✓ Cease and Desist/Injunction
	☐ Bar	Suspension
		□ Suspension
	B. Other Sanctions Ordered: APPLICANT MUST RETAIN AN INDEPENDENT CONSULTAN	NT TO CONDUCT MANDATED REVIEWS AND/OR REPORTS.
		uration including start date and capacities affected (General Securities Principal, Financial Operations
	Principal, etc.). If requalification by exam/retraining was a con	ndition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether
		penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against
	you or an advisory affiliate date paid and if any portion of pen	iaity was waived: ISGORGEMENT AMOUNTING TO \$2,614,865, PROPORTIONALLY TO THE IM PROGRAM ADVISORY FEES
	PAID BY SUCH CLIENT BETWEEN 1995 AND 2002.	The initiation of the i
3.	Provide a brief summary of details related to the action status and provided).	d (or) disposition and include relevant terms, conditions and dates (your response must fit within the space
		UNTARY REMEDIAL EFFORTS MADE PRIOR TO THE ORDER, AGREED TO CEASE AND DESIST FROM

FURTHER VIOLATIONS OF SECTION 206(2) OF THE ADVISERS ACT, RETAIN AN INDEPENDENT CONSULTANT, AND DISTRIBUTE DISGORGEMENT AS DESCRIBED IN

THE ORDER.

(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)

			GENERAL INSTRUCTI	ONS	
This Di	sclosure Repo	orting Page (DRP ADV) is an O	INITIAL OR AMENDED response used to r	eport details for affirmative respo	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Form	ADV.				
			Domilatom, Astion		
Check	item(s) being	responded to:	Regulatory Action		
■ 11.0		□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
■ 11.1		□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
☑ 11.1		☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	. ,
■ 11.I		☐ 11.G.	. ,	. ,	
Executi One ev	on Page. ent may result	t in more than one affirmative ans			tity using one DRP. File with a completed
	actions by moi	re than one regulator, provide det	ails to each action on a separate DRP.		
PARTI					
		r entity(ies) for whom this DRP is	s being filed is (are):		
	You (the adv	visory firm)			
G	You and one	e or more of your advisory affiliate	ac.		
C) 0110 01 111010	e of your advisory affiliates			
If ·	the <i>advisory a</i>	ffiliate has a CRD number, provid	give the full name of the <i>advisory affiliate</i> below the that number. If not, indicate "non-registered"		·
-	ADV DRP - ADV	/ISORY AFFILIATE			
	CRD Number:	14251	This advisory affiliate is	n Individual	
	Registered: Name:	• Yes • No METLIFE SECURITIES INC. (For individuals, Last, First, Mid-	dle)		
	CRD Number: Registered:	15840 ⊙ Yes ○ No	This advisory affiliate is 🧿 a Firm 🔘 a	n Individual	
	Name:	WALNUT STREET SECURITIES INC.	,		
		(For individuals, Last, First, Midd	lle)		
This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor. If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years				or (2) the adviser is registered or applying for sponse to Item 11.D(4), and only if that event	
	go. ቯ This DRP sl	nould be removed from the ADV r	record because it was filed in error, such as du	e to a clerical or data-entry mist	ake. Explain the circumstances:
	-		-	affiliate submitted a DRP (with F	Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	vent? If the ans	swer is "Yes," no other information	n on this DRP must be provided.		
			ve the advisory affiliate of its obligation to upda	ate its IARD or <i>CRD</i> records.	
PART II					
(ner Federal C State SRO			
		egulator, foreign financial regulator OCIATION OF SECURITIES DEA	ory authority, federal, state, or <i>SRO</i>) LERS		

2. Principal Sanction:

	Censure Other Sanctions:
	APPLICANT AND CONTROL AFFILIATES (METLIFE SECURITIES, INC. AND WALNUT STREET SECURITIES, INC.) WERE FINED \$5,000,000 JOINTLY AND SEVERALLY.
3.	Date Initiated (MM/DD/YYYY):
	12/15/2004 © Exact C Explanation
	If not exact, provide explanation:
1.	Docket/Case Number: EAF0401400001
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Mutual Fund(s) Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE AWC INCLUDED FINDING THATS APPLICANT AND CONTROL AFFILIATES EXECUTED LATE TRADES; SUBMITTED INACCURATE RESPONSES TO NASD REGULATORY INQUIRIES; FAILED TO ESTABLISH AND MAINTAIN ADEQUATE SUPERVISORY SYSTEMS AND WRITTEN PROCEDURES TO PREVENT OR DETECT LATE TRADING; FAILED TO CAPTURE THE TIME OF CUSTOMER MUTUAL FUND ORDERS; FAILED TO PRODUCE RESPONSIVE EMAILS IN A TIMELY FASHION; AND, FAILED TO RETAIN EMAILS FOR THE REQUIRED PERIOD.
3.	Current Status? C Pending C On Appeal C Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
f Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved:
	Acceptance, Waiver & Consent(AWC)
11.	Resolution Date (MM/DD/YYYY):
	09/18/2006
	If not exact, provide explanation:
12.	Resolution Detail:
	A. Were any of the following Sanctions Ordered (check all appropriate items)?
	✓ Monetary/Fine Amount: \$ 5,000,000.00
	Revocation/Expulsion/Denial Disgorgement/Restitution
	✓ Censure Cease and Desist/Injunction
	☐ Bar ☐ Suspension
	B. Other Sanctions <i>Ordered:</i> WITHIN 30 DAYS, AN OFFICER OF THE APPLICANT AND CONTROL AFFILIATES MUST CERTIFY TO THE NASD THAT THE FIRMS HAVE (I) REVIEWED THEIR PROCEDURES RELATED TO EMAIL RETENTION, RECORDING OF THE TIME OF MUTUAL FUND ORDERS, AND, THE PRODUCTION OF EMAIL IN RESPONSE TO REGULATORY REQUESTS AND LATE TRADING, AND (II) ESTABLISHED PROCEDURES DESIGNED TO ACHIEVE COMPLIANCE WITH LAWS, REGULATIONS, AND RULES CONCERNING THOSE MATTERS. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations
	Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> date paid and if any portion of penalty was waived: THE APPLICANT AND CONTROL AFFILIATES PAID THE \$5,000,000 FINE ON SEPTEMBER 26, 2006.
13.	Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).
	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE APPLICANT AND CONTROL AFFILIATES CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS. THEREFORE, APPLICANT AND CONTROL AFFILIATES WERE CENSURED AND FINED \$5,000,000 JOINTLY AND SEVERALLY. THE FINE WAS PAID ON SEPTEMBER 26, 2006.

of Form ADV.				
		Regulatory Action	on	
Check item(s) being	•			_
□ 11.C(1)	□ 11.C(2)	□ 11.C(3)	☐ 11.C(4)	□ 11.C(5)
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
□ 11.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
☐ 11.F.	□ 11.G.			
	· · · · · · · · · · · · · · · · · · ·			
Execution Page.		e same event or <i>proceeding</i> may be reported	·	
		rer to Items 11.C., 11.D., 11.E., 11.F. or 11 ils to each action on a separate DRP.	.G. Use only one DRP to report deta	ils related to the same event. If an event gives
PART I				
A. The person(s) of You (the ad	or entity(ies) for whom this DRP is by visory firm)	peing filed is (are):		
$_{f \odot}$ You and on	e or more of your advisory affiliates			
	e of your advisory affiliates			
		ve the full name of the <i>advisory affiliate</i> be	•	•
ADV DRP - AD	VISORY AFFILIATE			
CRD Number	: 14251	This advisory affiliate is • a Firm • C	an Individual	
Registered:	⊙ Yes O No			
Name:	METLIFE SECURITIES INC. (For individuals, Last, First, Middle)	e)		
CRD Number:	833	This advisory affiliate is a Firm C	an Individual	
Registered:	⊙ Yes ◯ No			
Name:	TOWER SQUARE SECURITIES,			
	INC. (For individuals, Last, First, Middle	e)		
CRD Number:	<u>15840</u>	This advisory affiliate is © a Firm O	an Individual	
Registered:	⊙ Yes C No			
Name:	WALNUT STREET SECURITIES,			
	INC. (For individuals, Last, First, Middle	.)		
This DRP s	hould be removed from the ADV re	cord because the advisory affiliate(s) is no	occurred more than ten years ago	or (2) the adviser is registered or applying for
-				oonse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
☐ This DRP s	hould be removed from the ADV re	cord because it was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
	affiliate is registered through the IAF swer is "Yes," no other information	•	ory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
C Yes 💿 I	No			
NOTE: The cor	npletion of this form does not reliev	e the <i>advisory affiliate</i> of its obligation to սբ	odate its IARD or <i>CRD</i> records.	
PART II				
1. Regulatory Acti	on initiated by: her Federal © State	Foreign		

2.	Principal Sanction: Censure Other Sanctions: FINE IN THE AMOUNT OF \$264,000.00					
	1 INC IIN THE AMOUNT OF \$204,000.00					
3.	Date Initiated (MM/DD/YYYY):					
	10/26/2006 C Exact C Explanation					
	If not exact, provide explanation:					
	THE AWC RESULTED FROM TWO SEPARATE INVESTIGATIONS; TO	HE DATE PROVIDED ABOVE IS THE START DATE OF THE FIRST INVESTIGATION.				
4.	Docket/Case Number:					
	AWC NO. 2006006777801					
5.	Advisory Affiliate Employing Firm when activity occurred which led to	the regulatory action (if applicable):				
6.	Principal Product Type:					
	No Product					
	Other Product Types:					
7.	Describe the allegations related to this regulatory action (your response	onse must fit within the space provided):				
	COMPLIANCE WITH REGARD TO THE REVIEW OF INCOMING AND ALLEGED THAT THE APPLICANT AND CONTROL AFFILIATES FAIL	FAILED TO IMPLEMENT A SUPERVISORY SYSTEM THAT WAS REASONABLY DESIGNED TO ACHIEVE DOUTGOING EMAIL CORRESPONDENCE OF REGISTERED REPRESENTATIVES. IT IS FURTHER ED TO ESTABLISH, IMPLEMENT AND ENFORCE A SUPERVISORY SYSTEM DESIGNED TO MONITOR OF ASSOCIATED PERSONS IN OUTSIDE BUSINESS ACTIVITIES AND PRIVATE SECURITIES				
8.	Current Status? C Pending C On Appeal Final					
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or St	tate Court) and Date Appeal Filed:				
lf Fi	inal or On Appeal, complete all items below. For Pending Actions, cor	mplete Item 13 only.				
10	How was matter resolved:					
10.	cceptance, Waiver & Consent(AWC)					
11.	Resolution Date (MM/DD/YYYY):					
	11/18/2009 © Exact C Explanation					
	f not exact, provide explanation:					
12.	Resolution Detail:					
	A. Were any of the following Sanctions <i>Ordered</i> (check all approp	priate items)?				
	Monetary/Fine Amount: \$ 1,200,000.00					
	Revocation/Expulsion/Denial	☐ Disgorgement/Restitution				
	▼ Censure	Cease and Desist/Injunction				
	☐ Bar	☐ Suspension				
	B. Other Sanctions Ordered:					
	Principal, etc.). If requalification by exam/retraining was a condition has been satisfied. If disposition resulted in a fine, per you or an advisory affiliate date paid and if any portion of penals	ation including start date and capacities affected (General Securities Principal, Financial Operations ition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether enalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied agains ty was waived: 1,200,000, JOINTLY AND SEVERALLY. THE APPLICANT'S PORTION OF THE FINE, WHICH AMOUNTED				
13.	Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).					
	THE APPLICANT AND CONTROL AFFILIATES EXECUTED A LETTER OF ACCEPTANCE, WAIVER AND CONSENT DATED OCTOBER 14, 2009, WITHOUT ADMITTING OR					

DENYING THE FINDINGS. FINRA ACCEPTED THE AWC ON NOVEMBER 18, 2009. THE APPLICANT AND CONTROL AFFILIATES WERE FINED \$1,200,000, JOINTLY AND

SEVERALLY. THE APPLICANT'S PORTION OF THE FINE, WHICH AMOUNTED TO \$264,000.00, WAS PAID ON NOVEMBER 24, 2009.

(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)

FINANCIAL INDUSTRY REGULATION AUTHORITY ("FINRA")

This	Disalagua Danastina Dana (DI	DD ADVV in an INITIAL A	GENERAL INSTRUC		
		RP ADV) is an $_{f \odot}$ INITIAL $_{\it OR}$ $^{f \bigcirc}$ $^{ m A}$	MENDED response used to	report details for affirmative respo	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Fo	orm ADV.				
			Regulatory Action	on	
Che	ck item(s) being responded to:				
	11.C(1)	□ 11.C(2)	☐ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	11.D(1)	11.D(2)	11.D(3)	11.D(4)	□ 11.D(5)
	11.E(1)	☑ 11.E(2)	☐ 11.E(3)	□ 11.E(4)	
	11.F.	□ 11.G.			
	a separate DRP for each event cution Page.	t or <i>proceeding</i> . The same event or	proceeding may be reporte	ed for more than one <i>person</i> or entit	y using one DRP. File with a completed
		one affirmative answer to Items 11.0 gulator, provide details to each action		G. Use only one DRP to report deta	ails related to the same event. If an event gives
PAR	TI				
A.		r whom this DRP is being filed is (ar	re):		
	You (the advisory firm)				
	~	nur.			
	C You and one or more of yo				
	One or more of your advisor	ory affiliates			
	· ·	n advisory affiliate, give the full name CRD number, provide that number. If	•	·	•
	ADV DRP - ADVISORY AFFILI	ATE			
			No Information	Filed	
	This DRP should be remove	ved from the ADV record because to ved from the ADV record because: and the event was resolved in the ad	(1) the event or proceeding	occurred more than ten years ago o	or (2) the adviser is registered or applying for
			•		oonse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
	☐ This DRP should be remove	ved from the ADV record because it	t was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
B.	-	tered through the IARD system or C no other information on this DRP m	_	ry affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the
	C Yes C No				
	NOTE: The completion of this	form does not relieve the advisory a	affiliate of its obligation to up	odate its IARD or <i>CRD</i> records.	
PAR					
1.	Regulatory Action initiated by: OSEC Other Federal				
		In financial regulatory authority, fede	aral atata ar CDO)		
	FINRA	in illianciai regulatory authority, lede	erai, state, or SKO)		
2.	Principal Sanction: Civil and Administrative Penal Other Sanctions: CENSURE	lt(ies) /Fine(s)			
3.	Date Initiated (MM/DD/YYYY):				
	02/15/2008 © Exact © Ex	xolanation			
	If not exact, provide explanatio	•			
4.	Docket/Case Number:				

E112005019301

5.	Advisory Affiliate Employing Firm when activity occurred which led to	the regulatory action (if	applicable):	
6.	Principal Product Type: No Product Other Product Types:			
7.	Describe the allegations related to this regulatory action (your responsible ALLEGATIONS INCLUDED BREAKPOINT SELF ASSESSMENT VAND RECORDKEEPING VIOLATIONS.	•		s, REPORTING AND SUPERVISORY VIOLATIONS,
8.	Current Status? Pending On Appeal Final			
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or Sta	ate Court) and Date Appo	eal Filed:	
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, com	plete Item 13 only.		
10.	How was matter resolved:			
	Acceptance, Waiver & Consent(AWC)			
11.	Resolution Date (MM/DD/YYYY):			
	03/23/2009 © Exact C Explanation			
	If not exact, provide explanation:			
12.	Resolution Detail:			
	A. Were any of the following Sanctions Ordered (check all appropr	riate items)?		
	✓ Monetary/Fine Amount: \$ 500,000.00			
	Revocation/Expulsion/Denial		Disgorgement/Restitution	
	☑ Censure		Cease and Desist/Injunction	
	☐ Bar		Suspension	
	B. Other Sanctions <i>Ordered:</i>			
	Sanction detail: if suspended, <i>enjoined</i> or barred, provide durat Principal, etc.). If requalification by exam/retraining was a condit condition has been satisfied. If disposition resulted in a fine, pe you or an <i>advisory affiliate</i> date paid and if any portion of penalty THE \$500,000 FINE WAS PAID ON APRIL 1, 2009.	ion of the sanction, provingly, restitution, disgor	de length of time given to requa	alify/retrain, type of exam required and whether
13.	Provide a brief summary of details related to the action status and (o provided).			
	NES EXECUTED A LETTER OF ACCEPTANCE, WAIVER AND CONS BREAKPOINT SELF ASSESSMENT VIOLATIONS, ANTI-MONEY LAU VIOLATIONS. FINRA ACCEPTED THE AWC ON MARCH 23, 2009. TH	NDERING VIOLATIONS,	REPORTING AND SUPERVISO	
This	Disclosure Reporting Page (DRP ADV) is an _⊙ INITIAL _{OR C} AME	GENERAL INSTRUC NDED response used to		sponses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
	orm ADV.		.,	, , , ,
01	the Manus (a) hadron are an alread to a	Regulatory Action	n	
	ck item(s) being responded to: 1.C(1)	11.C(3)	□ 11.C(4)	□ 11.C(5)
		11.D(3)	☑ 11.D(4)	□ 11.D(5)
		11.E(3)	□ 11.E(4)	V-7
□ 1				
	a separate DRP for each event or <i>proceeding</i> . The same event or <i>pro</i> eution Page.	oceeding may be reporte	d for more than one <i>person</i> or e	entity using one DRP. File with a completed
One	event may result in more than one affirmative answer to Items 11.C.,	11.D., 11.E., 11.F. or 11.	G. Use only one DRP to report of	details related to the same event. If an event gives

rise to actions by more than one regulator, provide details to each action on a separate DRP.

PAR	TI
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): You (the advisory firm)
	C You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	advisory affiliates
	If this DRP is being filed for an advisory affiliate, give the full name of the advisory affiliate below (for individuals, Last name, First name, Middle name). If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	No Information Filed
	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	T II
1.	Regulatory Action initiated by:
	C SEC C Other Federal
	MASSACHUSETTS SECURITIES DIVISION
2.	Principal Sanction:
	Other Other Sanctions:
	Cities Carrolloris.
3.	Date Initiated (MM/DD/YYYY):
	01/08/2010 Exact Explanation If not exact, provide explanation:
	ii not exact, provide explanation.
4.	Docket/Case Number:
	E-2010-0022
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Other
	Other Product Types:
	PROMISSORY NOTES
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): ALLEGED THAT APPLICANT DID NOT HAVE ADEQUATE SUPERVISORY POLICIES AND PROCEDURES TO DETECT AND DETER SELLING AWAY BY FOUR REGISTERED REPRESENTATIVES.
8.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10.	How was matter resolved:				
	Order				
11.	Resolution Date (MM/DD/YY	YY):			
	03/24/2010	Evalenation			
		•			
	If not exact, provide explana	tion:			
12.	Resolution Detail:				
	A. Were any of the follow	ing Sanctions Ordered (ch	eck all appropriate items)?		
		ount: \$			
	Revocation/Expuls	sion/Denial	Г	Disgorgement/Restitution	
	Censure .			Cease and Desist/Injunction	
	■ Bar			Suspension	
	B. Other Sanctions Order	rod:			
	b. Other Sanctions Order	rea.			
	condition has been say you or an <i>advisory affii</i> APPLICANT WAS ORI PAYMENTS OR LIKE F DETAILED REPORT TO DESCRIPTION OF AN	tisfied. If disposition result liate date paid and if any populate to ISSUE WRITTE PAYMENTS RECEIVED BY O THE DIVISION, WITHIN A OBJECTIONS RECEIVE details related to the action	ed in a fine, penalty, restitution, disgord ortion of penalty was waived: EN OFFERS OF RESCISSION (TO INCLEADED TO INVESTORS USING THE INVESTOR) TO INVESTORS USING DIN CONNECTION WITH THE DISTRIBUTE OF THE LAST PAYMENT TO A STATE OF THE PAYMENT TO A STATE OF THE PAYMENT TO A STATE OF THE PAYMENT TO A STATE OF	gement or monetary compensation. UDE ALL PRINCIPAL LESS ALL NG A LETTER AND METHOD APPEN INVESTOR, OUTLINING THE ABUTION OF THE RESCISSION.	fy/retrain, type of exam required and whether on, provide total amount, portion levied against WITHDRAWALS, REDEMPTIONS, INTEREST PROVED BY THE DIVISION; AND SUBMIT A ADMINISTRATION OF THE FUNDS AND A dates (your response must fit within the space
			GENERAL INSTRUC	TIONS	
This [Disclosure Reporting Page ((DRP ADV) is an 👩 INITIA	AL OR C AMENDED response used to	report details for affirmative resp	onses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
	m ADV.				
			Regulatory Action	on	
	k item(s) being responded t		-		T 44.0(5)
	I.C(1)	☐ 11.C(2)	11.C(3)	11.C(4)	□ 11.C(5)
	I.D(1)	11.D(2)	11.D(3)	11.D(4)	□ 11.D(5)
	.E(1)	▼ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
1 1	l.F.	☐ 11.G.			
One or	event may result in more that actions by more than one i	n one affirmative answer t			ntity using one DRP. File with a completed etails related to the same event. If an event gives
PART		for whom this DDD is bein	a filed is (ore).		
	The <i>person(s)</i> or entity(ies) O You (the advisory firm)	for whom this DRP is bein	g filed is (are):		
	You and one or more of your advisory affiliates				
	One or more of your adv	risory affiliates			
	If this DRP is being filed for an advisory affiliate, give the full name of the advisory affiliate below (for individuals, Last name, First name, Middle name).				
			at number. If not, indicate "non-registere	·	•
	ADV DRP - ADVISORY AFF	ILIATE			
	<i>CRD</i> Number: <u>14251</u>		This advisory affiliate is 🧿 a Firm 🏻 C	an Individual	
	Registered:	Ō No			
		SECURITIES INC.			
		_ ·· · · - ·			

	This DRP should be removed from the ADV record because the advisory alimate(s) is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	T II
1.	Regulatory Action initiated by: C SEC C Other Federal C State C SRO C Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)
2.	Principal Sanction:
	Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	C Exact C Explanation If not exact, provide explanation:
4.	Docket/Case Number:
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type:
	Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):
8.	Current Status? C Pending C On Appeal C Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved:
11.	Resolution Date (MM/DD/YYYY):
	C Exact C Explanation
	If not exact, provide explanation:
12.	Resolution Detail:
	A. Were any of the following Sanctions Ordered (check all appropriate items)?
	☐ Monetary/Fine Amount: \$
	Revocation/Expulsion/Denial Disgorgement/Restitution
	☐ Censure ☐ Cease and Desist/Injunction ☐ Cease and Desist/Injunction
	☐ Bar ☐ Suspension
	B. Other Sanctions Ordered:
	Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations

Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether

	condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate date paid and if any portion of penalty was waived:					
	vide a briet vided).	f summary of details related to the action s	status and (or) disposition and inclu	de relevant terms, conditions and d	ates (your response must fit within the space	
			OFNEDAL INOTOL	OTIONIO		
This Disc	losure Rep	porting Page (DRP ADV) is an 👩 INITIAL	GENERAL INSTRU		nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.	
of Form A			OR C			
Chack its	am(s) being	g responded to:	Regulatory Act	on		
11.C		☐ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
11.D		☑ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	☐ 11.D(5)	
11.E(,	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	E 11.5(c)	
11.F.	. • /	□ 11.G.	(0)	(·)		
rise to ac	nt may resu	ult in more than one affirmative answer to I ore than one regulator, provide details to e		.G. Use only one DRP to report deta	ails related to the same event. If an event gives	
PART I						
		or entity(ies) for whom this DRP is being t	filed is (are):			
~		dvisory firm)				
0	You and or	ne or more of your advisory affiliates				
		re of your advisory affiliates				
•		advisory aniliates				
lf th	ie DPD ie h	peing filed for an <i>advisory affiliate</i> , give the	full name of the advisory affiliate he	Now (for individuals I ast name Firs	et name, Middle name)	
		affiliate has a CRD number, provide that r		-	·	
AD	V DRP - AE	OVISORY AFFILIATE				
C	<i>RD</i> Numbe	r: Th	is advisory affiliate is 🌀 a Firm 🤇	⁾ an Individual		
R	egistered:	O Yes ⊙ No				
N	ame:	METLIFE, INC. ("METLIFE")				
		(For individuals, Last, First, Middle)				
	RD	Th	is advisory affiliate is 🌀 a Firm 🤇	an Individual		
	umber:					
R	egistered:	C Yes O No				
N	ame:	METLIFE BANK, N.A. ("METLIFE				
		BANK") (For individuals, Last, First, Middle)				
If y occased	This DRP s registration ou are regi- curred more	n with the SEC and the event was resolved stered or registering with a state securities	because: (1) the event or proceeding of in the adviser's or advisory affiliate authority, you may remove a DRP or registering with the SEC, you may	occurred more than ten years ago or 's favor. for an event you reported only in res y remove a DRP for any event listed	or (2) the adviser is registered or applying for ponse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years	
		affiliate is registered through the IARD sys		ory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the	
0	Yes 🧿	No				
NO.	TE: The co	mpletion of this form does not relieve the a	advisory affiliate of its obligation to u	pdate its IARD or <i>CRD</i> records.		

1.	Regulatory Action initiated by: C SEC Other Federal O State O SRO O Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) OFFICE OF THE COMPTROLLER OF THE CURRENCY ("OCC") BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM ("FRB")
2.	Principal Sanction: Cease and Desist Other Sanctions:
	OCC: METLIFE BANK, N.A.: CASH PAYMENT OF APPROXIMATELY \$30,000,000 TO THE QUALIFIED SETTLEMENT FUND ESTABLISHED FOR MAKING BORROWER DISTRIBUTIONS. ADDITIONAL LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION ACTIONS, WHICH SHALL BE SATISFIED BY A PAYMENT OF APPROXIMATELY \$15,500,000 TO THE QUALIFIED SETTLEMENT FUND. FRB: METLIFE, INC.: CIVIL MONEY PENALTY OF \$3,200,000, TO BE PAID WITHIN TWO YEARS OF 8/6/2012. SUCH AMOUNT MAY BE REDUCED AND/OR THE DUE DATE MAY BE EXTENDED UNDER THE CONDITIONS DESCRIBED
3.	Date Initiated (MM/DD/YYYY):
	04/13/2011 C Exact Explanation
	If not exact, provide explanation: THIS MATTER WAS PART OF A REVIEW BY FEDERAL BANKING REGULATORS, INCLUDING THE OCC AND FRB, OF THE MORTGAGE-SERVICING AND FORECLOSURE-PROCESSING ACTIVITIES OF THE LARGEST MORTGAGE SERVICERS IN THE COUNTRY, INCLUDING METLIFE BANK.
4.	Docket/Case Number: OCC: 2013-126; 2011-047 [AA-EC-11-16]
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Banking Products (Other than CD(s)) Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): AS PART OF THE REVIEW OF THE LARGEST MORTGAGE SERVICERS, IT WAS ALLEGED IN THE OCC CONSENT ORDER (WHICH METLIFE BANK NEITHER ADMITTED OR DENIED) THAT METLIFE BANK'S ACTIVITIES REFLECTED CERTAIN MORTGAGE-SERVICING AND FORECLOSURE-PROCESSING DEFICIENCIES. BASED ON THE FINDINGS IN THE OCC CONSENT ORDER, THE FRB ALLEGED THAT METLIFE NEEDED TO ENHANCE ITS SUPERVISION AND OVERSIGHT OF THE MORTGAGE-SERVICING ACTIVITIES OF ITS BANK SUBSIDIARY, METLIFE BANK. (FRB DOCKET # 11-028-B-HC).
8.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved: Consent
11.	Resolution Date (MM/DD/YYYY):
	02/28/2013 © Exact C Explanation
	If not exact, provide explanation:
12.	Resolution Detail:
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?
	Monetary/Fine Amount: \$ 3,200,000.00
	☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution ☐ Censure ☐ Cease and Desist/Injunction
	☐ Bar ☐ Suspension
	B. Other Sanctions <i>Ordered:</i> OCC:METLIFE BANK, N.A.: CASH PAYMENT OF APPROXIMATELY \$30,000,000 BY METLIFE BANK, N.A., TO THE QUALIFIED SETTLEMENT FUND ESTABLISHED FOR THE PURPOSE OF MAKING BORROWER DISTRIBUTIONS. ADDITIONAL LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION ACTIONS, WHICH SHALL BE SATISFIED BY A PAYMENT OF APPROXIMATELY \$15,500,000 TO THE QUALIFIED SETTLEMENT FUND. FRB:METLIFE, INC.: CIVIL MONEY PENALTY OF \$3,200,000, TO BE PAID WITHIN TWO YEARS OF 8/6/2012. SUCH AMOUNT MAY BE REDUCED AND/OR THE DUE DATE MAY BE EXTENDED UNDER THE CONDITIONS DESCRIBED IN THE FRB ORDER OF ASSESSMENT OF CIVIL MONEY PENALTY (DOCKET NO. 12-053-CMP-HC). Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether

condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against

you or an advisory affiliate date paid and if any portion of penalty was waived:

PART II

event? If the answer is "Yes," no other information on this DRP must be provided.

O Yes O No

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).

THE RESOLUTION OF THIS MATTER ON FEBRUARY 28, 2013 CONCLUDED A REVIEW BY FEDERAL BANKING REGULATORY AUTHORITIES, INCLUDING THE OCC AND THE FRB, OF THE MORTGAGE-SERVICING AND FORECLOSURE-PROCESSING ACTIVITIES OF THE LARGEST MORTGAGE SERVICERS IN THE COUNTRY, INCLUDING METLIFE BANK. THE RESOLUTION OF THE MATTER ON THIS DATE INCLUDED THE ACCELERATION OF THE FORECLOSURE REVIEW BEING CONDUCTED REGARDING ALL OF THE PARTICIPATING BANKS AND THE REMEDIATION ACTIVITIES BEING DIRECTED TO THE BORROWERS INVOLVED. AS PART OF ITS PARTICULAR ARRANGEMENT WITH THE OCC, METLIFE BANK AGREED TO PAY APPROXIMATELY \$30,000,000 FOR TO A QUALIFIED SETTLEMENT FUND ESTABLISHED FOR MAKING DISTRIBUTIONS TO BORROWERS; METLIFE BANK AGREED TO PROVIDE CERTAIN LOSS MITIGATION OR OTHER FORECLOSURE PREVENTION ACTIONS OVER THE NEXT TWO YEARS, WHICH IT WILL FULFILL BY MAKING A PAYMENT OF APPROXIMATELY \$15,500,00 INTO A QUALIFIED SETTLEMENT FUND. SINCE THE INITIATION OF THIS MATTER, METLIFE BANK HAS EXITED THE DEPOSIT BUSINESS AND SOLD OR TERMINATED THE MAJORITY OF ITS MORTGAGE-SERVICING ASSETS AND ACTIVITIES. METLIFE BANK'S DEPOSIT INSURANCE COVERAGE WAS TERMINATED AS OF JANUARY 14, 2013, WHICH RESULTED IN METLIFE NO LONGER BEING A BANK HOLDING COMPANY SUBJECT TO REGULATION BY THE FRB.

		GENERAL INSTRU	CTIONS	
This Disclosure	Reporting Page (DRP ADV) is an 👩 INITIAL			nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Form ADV.		UR U		
Chack itam(s) h	peing responded to:	Regulatory Act	on	
11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	☐ 11.C(5)
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	_ · · · · · · (0)
□ 11.F.	☑ 11.G.	= ···=(0)		
Execution Page One event may		Items 11.C., 11.D., 11.E., 11.F. or 1	•	y using one DRP. File with a completed sils related to the same event. If an event gives
PART I				
-	n(s) or entity(ies) for whom this DRP is being ne advisory firm)	filed is (are):		
O You ar	nd one or more of your advisory affiliates			
	more of your advisory affiliates			
· ·	advisory affiliates			
If this DRF	is being filed for an <i>advisory affiliate</i> , give the	e full name of the advisory affiliate be	low (for individuals, Last name, Firs	t name, Middle name).
If the advis	sory affiliate has a CRD number, provide that	number. If not, indicate "non-register	ed" by checking the appropriate box.	
ADV DRP	- ADVISORY AFFILIATE			
CRD Number:	т	his advisory affiliate is 🌀 a Firm 🤇	an Individual	
Register	ed: O Yes ⊙ No			
Name:	METLIFE INSURANCE COMPANY OF KOREA LIMITED			
	(For individuals, Last, First, Middle)			
☐ This D registra	RP should be removed from the ADV record RP should be removed from the ADV record ation with the SEC and the event was resolve registered or registering with a <i>state securitie</i> more than ten years ago. If you are registered	because: (1) the event or proceeding and in the adviser's or advisory affiliated as authority, you may remove a DRP	occurred more than ten years ago or stayor. for an event you reported only in resp	or (2) the adviser is registered or applying for conse to Item 11.D(4), and only if that event
☐ This D	RP should be removed from the ADV record	because it was filed in error, such as	due to a clerical or data-entry mista	ke. Explain the circumstances:
B. If the advis	sory affiliate is registered through the IARD sy	stem or <i>CRD</i> system, has the <i>advis</i> e	ory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the

'AR	ГІІ
1.	Regulatory Action initiated by: O SEC Other Federal O State O SRO Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FAIR TRADE COMMISSION OF KOREA (THE "KOREA FTC")
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: THE KOREA FTC ALSO RECOMMENDED THAT THE PROSECUTOR'S OFFICE CONDUCT A CRIMINAL INVESTIGATION OF THE ALLEGED COLLUSION REGARDING THREE OF THE RESPONDENT COMPANIES, INCLUDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. ON MAY 3, 2013, THE PROSECUTOR'S OFFICE DECIDED NOT TO INDICT ANY OF THE THREE INSURANCE COMPANIES THAT HAD BEEN RECOMMENDED FOR INVESTIGATION. THE KOREA FTC MAY DECIDE TO APPEAL THIS DECISION.
3.	Date Initiated (MM/DD/YYYY):
	01/18/2012 © Exact C Explanation If not exact, provide explanation:
4.	Docket/Case Number: 2012KACHONG2751
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type: Insurance Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): IN 2012, THE KOREA FTC BEGAN INVESTIGATING ALLEGED COLLUSION ON VARIOUS FEES FOR VARIABLE INSURANCE PRODUCTS (E.G., INVESTMENT MANAGEMENT FEES, GUARANTEE FEES, ETC.) AMONG NINE INSURANCE COMPANIES IN KOREA, INCLUDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. THE KOREA FTC IMPOSED ADMINISTRATIVE FINES AGAINST THE NINE RESPONDENT COMPANIES, INCLUDING A FINE IN THE AMOUNT OF \$800,000 REGARDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. THE KOREA FTC ALSO RECOMMENDED THAT THE PROSECUTOR'S OFFICE CONDUCT A CRIMINAL INVESTIGATION OF THE ALLEGED COLLUSION REGARDING THREE OF THE RESPONDENT COMPANIES, INCLUDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. ON MAY 3, 2013, THE PROSECUTOR'S OFFICE DECIDED NOT TO INDICT ANY OF THE THREE INSURANCE COMPANIES THAT HAD BEEN RECOMMENDED FOR INVESTIGATION.
8.	Current Status?
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved:
11.	Resolution Date (MM/DD/YYYY):
	C Exact C Explanation
	If not exact, provide explanation:
12.	Resolution Detail:
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?
	☐ Monetary/Fine Amount: \$
	☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution
	☐ Censure ☐ Cease and Desist/Injunction
	☐ Bar ☐ Suspension
	B. Other Sanctions <i>Ordered:</i>
	Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations

NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.

Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate* date paid and if any portion of penalty was waived:

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). IN 2012, THE KOREA FTC BEGAN INVESTIGATING ALLEGED COLLUSION ON VARIOUS FEES FOR VARIABLE INSURANCE PRODUCTS (E.G., INVESTMENT MANAGEMENT FEES, GUARANTEE FEES, ETC.) AMONG NINE INSURANCE COMPANIES IN KOREA, INCLUDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. ON APRIL 8, 2013, THE KOREA FTC IMPOSED ADMINISTRATIVE FINES AGAINST THE NINE RESPONDENT COMPANIES, INCLUDING A FINE IN THE AMOUNT OF \$800,000 REGARDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. THE KOREA FTC ALSO RECOMMENDED THAT THE PROSECUTOR'S OFFICE CONDUCT A CRIMINAL INVESTIGATION OF THE ALLEGED COLLUSION REGARDING THREE OF THE RESPONDENT COMPANIES, INCLUDING METLIFE INSURANCE COMPANY OF KOREA LIMITED. ON MAY 3, 2013, THE PROSECUTOR'S OFFICE DECIDED NOT TO INDICT ANY OF THE THREE INSURANCE COMPANIES THAT HAD BEEN RECOMMENDED FOR INVESTIGATION. THE KOREA FTC MAY DECIDE TO APPEAL THE DECISION BY THE PROSECUTOR'S OFFICE. METLIFE INSURANCE COMPANY OF KOREA LIMITED WILL BE FILING AN APPEAL OF THE ADMINSTRATIVE FINE DECISION BY THE KOREA FTC.					
of Form ADV.	g , ago (2.11 , 12), lo all 🕟 III I 2	OR C 7 IIII _ 100poneo ussu	to report details for all linears reaps.	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.	
		Regulatory Act	ion		
Check item(s) being resp					
□ 11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
□ 11.D(1)	☑ 11.D(2)	□ 11.D(3)	☑ 11.D(4)	☐ 11.D(5)	
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)		
□ 11.F.	□ 11.G.		• •		
Execution Page. One event may result in rrise to actions by more the	· · · · · · ·	Items 11.C., 11.D., 11.E., 11.F. or 1		ty using one DRP. File with a completed ails related to the same event. If an event gives	
PART I	tity(ies) for whom this DRP is being				
One or more of y If this DRP is being	more of your advisory affiliates your advisory affiliates filed for an advisory affiliate, give the	•	elow (for individuals, Last name, Firs red" by checking the appropriate box.	•	
ADV DRP - ADVISO	DRY AFFILIATE				
KORI		his advisory affiliate is 🧿 a Firm 🤇	an Individual		
This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor. If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event					
ago.	occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago. This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:				
I I	B. If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.				
O Yes ⊙ No	C Yes O No				
NOTE: The completion of this form does not relieve the <i>advisory affiliate</i> of its obligation to update its IARD or <i>CRD</i> records. PART II					

1.	_	Regulatory Action initiated by:	
		O SEC Other Federal O State O SRO Foreign	
		(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FAIR TRADE COMMISSION OF KOREA (THE "KOREA FTC")	
2.	Princ	Principal Sanction:	
		Civil and Administrative Penalt(ies) /Fine(s)	
		Other Sanctions: ADMINISTRATIVE FINE OF \$1,088,000	
	ADIVI	ADMINISTRATIVE TIME OF \$1,000,000	
3.		Date Initiated (MM/DD/YYYY):	
		09/07/2010	
4.		Docket/Case Number: 2011KACHONG1751	
5.	Advi	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):	
6.	Princ	Principal Product Type:	
		Other	
		Other Product Types: SAVINGS-TYPE PRODUCTS	
7.	Desc	Describe the allegations related to this regulatory action (your response must fit within the space provide	ed):
	IN 20	IN 2010, THE FAIR TRADE COMMISSION OF KOREA (THE "KOREA FTC") BEGAN INVESTIGATING ALLE	EGATIONS OF PRICE FIXING INVOLVING ALL OF THE TWENTY-TWO
		LIFE INSURANCE COMPANIES DOING BUSINESS IN KOREA. IN DECEMBER 2011, FOLLOWING NUM	•
		THE KOREA FTC CONCLUDED THAT SIXTEEN LIFE INSURANCE COMPANIES, INCLUDING METLIFE INPROPER EXCHANGE OF INFORMATION WHEN DETERMINING INTEREST RATES FOR SAVINGS-T	
		ADMINISTRATIVE FINES ON METLIFE INSURANCE COMPANY OF KOREA LIMITED. IN JANUARY 2012,	
	KOR	KOREA FTC'S DECISION. SEVERAL HEARINGS HAVE TAKEN PLACE SINCE MAY 2012. THE MOST RE	CENT HEARING WAS HELD ON APRIL 4, 2013. THE NEXT HEARING
	IS SE	IS SET FOR MAY 21, 2013, AND THAT MAY BE THE LAST HEARING, AFTER WHICH THE COURT MAY E	ENTER ITS DECISION.
8	Curre	Current Status? C Pending C On Appeal C Final	
O.	Curr	Carron Status. 1 Shaing Chrispian 1 mai	
9.	If on	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:	
		KOREA FTC ADMINISTRATIVE FINE APPEALED TO KOREAN COURT IN JANUARY 2012. A NUMBER O	F HEARINGS HAVE BEEN HELD SINCE MAY 2012, WITH THE NEXT
	ONE	ONE SET FOR MAY 21, 2013.	
If Fi	nal or	nal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	How	How was matter resolved:	
	Deci	Decision	
11.	Resc	Resolution Date (MM/DD/YYYY):	
	12/1	12/19/2011 © Exact C Explanation	
		If not exact, provide explanation:	
		IN DECEMBER 2011, KOREA FTC MADE DECISION AND IMPOSED ADMINISTRATIVE FINE. THIS DECI	SION IS UNDER APPEAL.
12.	Resc	Resolution Detail:	
	A.	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?	
		Monetary/Fine Amount: \$ 1,088,000.00	
			ment/Restitution
			d Desist/Injunction
		☐ Bar ☐ Suspensi	on
	B.	B. Other Sanctions Ordered:	
		Sanction detail: if suspended, enjoined or barred, provide duration including start date and capaciti	ies affected (General Securities Principal, Financial Operations
		Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length o	

you or an advisory affiliate date paid and if any portion of penalty was waived:

PLEASE REFER TO DETAILS IN ITEM 7.

provided).	D DETAILS IN ITEM 7.	n status and (or) disposition and incid	ide relevant terms, conditions and da	ates (your response must fit within the space
		GENERAL INSTRU	CTIONS	
This Disclosure Reporting	g Page (DRP ADV) is an 👩 INITIA	AL OR O AMENDED response used	to report details for affirmative respon	nses to Items 11.C., 11.D., 11.E., 11.F. or 11.G.
of Form ADV.				
		Regulatory Act	ion	
Check item(s) being resp	conded to:	regulatory rec		
□ 11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
☑ 11.D(1)	☑ 11.D(2)	□ 11.D(3)	□ 11.D(4)	☐ 11.D(5)
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 11.F.	☐ 11.G.			
Execution Page. One event may result in r	more than one affirmative answer to	o Items 11.C., 11.D., 11.E., 11.F. or 1		ty using one DRP. File with a completed ails related to the same event. If an event gives
rise to actions by more th	nan one regulator, provide details to	o each action on a separate DRP.		
PART I				
A. The <i>person(s)</i> or en You (the advisor	ntity(ies) for whom this DRP is being rv firm)	g filed is (are):		
-	more of your advisory affiliates			
• One of more or y	your advisory affiliates			
If this DRP is being	filed for an advisory affiliate, give the	he full name of the <i>advisory affiliate</i> be	elow (for individuals, Last name, Firs	st name. Middle name).
		t number. If not, indicate "non-register	•	
ADV DRP - ADVISO	DRY AFFILIATE			
CRD				
Number:		This advisory affiliate is 🧿 a Firm 🤇	an Individual	
Registered: O Y	es 🖲 No			
Name: AMEI	RICAN LIFE INSURANCE			
	IPANY ("ALICO")			
(For i	individuals, Last, First, Middle)			
CRD	-	This advisory affiliate is 6 a Firm	an Individual	
Number:		The advicery annual to a Time	an marrada.	
Registered: O Y	′es 🌀 No			
Name: DELA	AWARE AMERICAN LIFE			
	JRANCE COMPANY ("DELAM")			
(For i	individuals, Last, First, Middle)			
CRD Number:	-	This advisory affiliate is © a Firm	an Individual	
Registered:	Yes ⊙ No			
	ETLIFE INC. ("METLIFE")			
	or individuals, Last, First, Middle)			
This DRP should	d be removed from the ADV record	d because the advisory affiliate(s) is not because: (1) the event or proceeding yed in the adviser's or advisory affiliate	g occurred more than ten years ago	or (2) the adviser is registered or applying for
•				ponse to Item 11.D(4), and only if that event in Item 11 that occurred more than ten years
☐ This DRP should	d be removed from the ADV record	d because it was filed in error, such as	s due to a clerical or data-entry mista	ske. Explain the circumstances:
B. If the advisory affilia	ate is registered through the IARD s	system or <i>CRD</i> system, has the <i>advis</i>	ory affiliate submitted a DRP (with Fo	orm ADV, BD or U-4) to the IARD or <i>CRD</i> for the

event? If the answer is "Yes," no other information on this DRP must be provided.

	NOT	E: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	ΤII	
1.	-	ulatory Action initiated by: SEC _C Other Federal ⊙ State C _{SRO} C ^{Foreign}
	(Full	I name of regulator, foreign financial regulatory authority, federal, state, or SRO) V YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("DFS") DISTRICT ATTORNEY, NEW YORK COUNTY ("DANY")
2.	Civil	cipal Sanction: I and Administrative Penalt(ies) /Fine(s) er Sanctions:
3.	Date	e Initiated (MM/DD/YYYY):
		99/2012 © Exact © Explanation It exact, provide explanation:
4.		ket/Case Number: 012 0 00197126 [DANY]
5.	Adv	isory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Insu	cipal Product Type: Irance er Product Types:
7.	IN 20 PRE SUB BUS	cribe the allegations related to this regulatory action (your response must fit within the space provided): 009, ALICO AND ITS OUTSIDE COUNSEL MADE CERTAIN REPRESENTATIONS IN A LETTER TO THE NEW YORK STATE INSURANCE DEPARTMENT (THE EDECESSOR OF DFS) CONCERNING ITS OPERATIONS IN NEW YORK. IT WAS ALLEGED THAT CONTRARY TO THESE REPRESENTATIONS, ALICO AND DELAM, ESIDIARIES OF AMERICAN INTERNATIONAL GROUP ("AIG") UNTIL NOVEMBER 2010, AND LATER OF METLIFE AFTER NOVEMBER 2010, WERE DOING INSURANCE SINESS IN NEW YORK WITHOUT A LICENSE. FURTHER, IT WAS ALLEGED THAT, BY CONDUCTING CERTAIN ACTIVITIES IN NEW YORK, REPRESENTATIVES ON IALF OF ALICO, DELAM, AIG AND METLIFE WERE SOLICITING INSURANCE BUSINESS WITHOUT A LICENSE.
8.	Curr	rent Status? C Pending C On Appeal C Final
9.	If on	appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal o	r On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.		was matter resolved: sent
11.	Res	olution Date (MM/DD/YYYY):
	03/3	31/2014
	If no	t exact, provide explanation:
12.	Res	olution Detail:
	A.	Were any of the following Sanctions Ordered (check all appropriate items)?
		✓ Monetary/Fine Amount: \$ 60,000,000.00
		☐ Revocation/Expulsion/Denial ☐ Disgorgement/Restitution
		☐ Censure ☐ Cease and Desist/Injunction
		□ Bar □ Suspension
	B.	Other Sanctions <i>Ordered:</i> AS REQUIRED BY THE CONSENT ORDER WITH DFS, REPRESENTATIVES ENGAGING IN CERTAIN ACTIVITIES IN NEW YORK MUST OBTAIN AN INSURANCE LICENSE AND AN AUTHORIZED INSURER IN NEW YORK MUST FILE CERTAIN INFORMATION CONCERNING ISSUANCE OF COVERAGE BY INSURERS LICENSED OUTSIDE THE UNITED STATES. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> date paid and if any portion of penalty was waived:
		\$50,000,000 PAID BY METLIFE, INC. TO DFS [PAYMENT DATE - MARCH 31, 2014] \$10,000,000 PAID BY METLIFE, INC. TO DANY [PAYMENT DATE - MARCH 31, 2014]

O Yes O No

	3. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space						
S F F (CONSENT ORDER WITH DFS, METLIFE, ALICO AND DELAM, EFFECTIVE MARCH 31, 2014. FINE OF \$50,000,000 ASSESSED AGAINST METLIFE TO BE PAID WITHIN SEVEN DAYS OF EFFECTIVE DATE. DEFERRED PROSECUTION AGREEMENT (THE "AGREEMENT") SIGNED BY DANY, METLIFE, ALICO AND DELAM ON MARCH 28, 2014. PAYMENT OF \$10,000,000 TO BE MADE BY METLIFE. IF COMPLIANCE WITH THE AGREEMENT FOR 24 MONTHS, THE AGREEMENT SHALL EXPIRE AND BE OF NO FURTHER FORCE AND EFFECT. AS REQUIRED BY THE CONSENT ORDER WITH DFS, REPRESENTATIVES ENGAGING IN CERTAIN ACTIVITIES IN NEW YORK MUST OBTAIN AN INSURANCE LICENSE AND AN AUTHORIZED INSURER IN NEW YORK MUST FILE CERTAIN INFORMATION CONCERNING ISSUANCE OF COVERAGE BY INSURERS LICENSED OUTSIDE THE UNITED STATES. METLIFE, ALICO AND DELAM ARE CONTINUING TO COOPERATE WITH A PARALLEL INVESTIGATION BY THE NEW YORK STATE OFFICE OF THE ATTORNEY GENERAL TAXPAYER PROTECTION BUREAU CONCERNING ALICO AND DELAM'S NEW YORK STATE TAX FILINGS.						
IVIL J	UDICIAL AC	TION DISCLOSURE REF	PORTING PAGE (ADV)				
Thic D	icolocuro Po	oporting Page (DPP AF	NV) is an an INITIAL		STRUCTIONS	responses to Item 11 H, of Part 1A or Item 2 F, of Part	
	Form ADV.	sporting rage (DICI AL	OR INTIAL OR	AMENDED response	used to report details for animative i	responses to Item 11.H. of Part 1A or Item 2.F. of Part	
				Civil .	ludicial		
Check	Part 1A iten	n(s) being responded to	o:	Olvii (radiolal		
□ 11	.H(1)(a)		☐ 11.H(1)(b)		☑ 11.H(1)(c)	□ 11.H(2)	
Check	Part 1B iten	n(s) being responded to	0:				
☐ 2.F		□ 2.		2.F(3)	☐ 2.F(4)	□ 2.F(5)	
Execu One e udicia	tion Page. vent may res	·	firmative answer to Item 1			or entity using one DRP. File with a completed report details related to the same event. Unrelated civil	
PART							
	•	e) or entity(ies) for whon advisory firm)	n this DRP is being filed i	is (are):			
	~						
		one or more of your adv					
(⊙ One or mo	ore of your advisory aff	iliates				
				-	liate below (for individuals, Last name egistered" by checking the appropriat	•	
	ADV DRP - A	DVISORY AFFILIATE					
	CRD	4095	This ad	dvisory affiliate is 🌀 a F	rm C an Individual		
	Number: Registered:			·			
	Name:		= INSURANCE				
		COMPANY (For individuals, Last,					
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor. If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.H.(1)(a), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.						
	_	should be removed fro	om the ADV record becau	use it was filed in error, s	uch as due to a clerical or data-entry	mistake. Explain the circumstances:	
	-	•	hrough the IARD system er information on this DR		advisory affiliate submitted a DRP (w	with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the	
(• Yes C	No					

NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.

PAR		
	Court Action initiated by: (Name of regulator, foreign financial regulatory authority, SRO, co	ommodities exchange, agency, firm, private plaintiff, etc.)
2.	Principal Relief Sought:	
	Other Relief Sought:	
3.	Filing Date of Court Action (MM/DD/YYYY):	
	© Exact © Explanation If not exact, provide explanation:	
4.	Principal Product Type:	
	Other Product Types:	
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of	f Court - City or County and State or Country, Docket/Case Number):
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial actio	n (if applicable):
7.	Describe the allegations related to this civil action (your response must fit within the space	e provided):
8.	Current Status? C Pending C On Appeal C Final	
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YY	YY):
10.	If pending, date notice/process was served (MM/DD/YYYY):	
	C Exact C Explanation If not exact, provide explanation:	
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.	
11.	How was matter resolved:	
12.	Resolution Date (MM/DD/YYYY):	
	C Exact C Explanation If not exact, provide explanation:	
13.	Resolution Detail:	
	A. Were any of the following Sanctions Ordered or Relief Granted(check appropriate ite	ems)?
	☐ Monetary/Fine Amount: \$ ☐ Revocation/Expulsion/Denial	☐ Disgorgement/Restitution
	Censure	☐ Cease and Desist/Injunction
	☐ Bar	Suspension
	B. Other Sanctions:	
	C. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start data Principal, etc.). If requalification by exam/retraining was a condition of the sanction, periodic condition has been satisfied. If disposition resulted in a fine, penalty, restitution, discussion of an <i>advisory affiliate</i> date paid and if any portion of penalty was waived:	rovide length of time given to requalify/retrain, type of exam required and whether
14.	Provide a brief summary of circumstances related to the action(s), allegation(s), dispositi provided)	on(s) and/or finding(s) disclosed above (your response must fit within the space

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

Are you exempt from delivering a brochure to all of your clients under these rules?

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
47171	FUND MANAGEMENT SERVICES PROGRAM DISCLOSURE BROCHURE	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional
47180	ADVISOR SELECT PROGRAM WRAP FEE BROCHURE	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional, Wrap program
47188	FUND SELECT/FUND SELECT PREMIER PROGRAMS DISCLOSURE BROCHURE	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Government/municipal, Other institutional
47201	MANAGER SELECT PREMIER WRAP FEE BROCHURE	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional, Wrap program
47212	MANAGER SELECT WRAP FEE BROCHURE	High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional, Wrap program
47220	DISCLOSURE BROCHURE FOR THIRD PARTY PROGRAMS	Individuals, High net worth individuals, Pension plans/profit sharing plans, Foundations/charities, Other institutional, Wrap program, Selection of Other Advisers/Solicitors
48346	FINANCIAL PLANNING SERVICES	Individuals, Other institutional, Financial Planning Services
105434	FIDUCIARY INVESTMENT ADVISER PROGRAM	Selection of Other Advisers/Solicitors, Pension plans/profit sharing plans, Pension consulting

 \odot

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

MARC A. COHN

12/23/2014

Printed Name:

Title:

MARC A. COHN

CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

Advise

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice,

subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. Non-Resident Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: Date: MM/DD/YYYY
Printed Name: Title:

Adviser *CRD* Number:

615