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Firm Brochure
Form ADV Part 2A

January 31, 2024

This brochure provides information about the qualifications and business practices of Ally Invest Advisors Inc. P > If you have any questions about the contents of this brochure, please contact our Compliance Department at (855) 880-2559. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about AIA also b v - ^ - b t - 0 t ; o m | _ ; " www.adviserinfo.sec.gov.

AIA is registered with the SEC as an investment adviser under the Investment Advisers Act of 1940, as amended. However, such registration does not imply a certain level of skill or training, nor does it constitute an endorsement by the SEC.

Throughout this document, AIA is also referred to as the > b u l 7 ? , ? %u . ? 1$v_term > t b ; refers to a person with whom AIA has established an advisory relationship

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Form ADV Part 2A

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- The Tax-Optimized portfolio models are similar to the Core portfolio models but incorporate ETFswith municipal bond exposure to help enhance the after-tax yield. This portfolio type offers higher dividend yields while maintaining a more conservative risk profile.
- The Income portfolio model is designed to be a lower-risk approach to help investors who may want supplemental income for retirement or other purposes. The model seeks safety and returns covering increasing investment value. The model offers higher dividend yields while maintaining a more conservative risk profile.

Following responses to a series of online multiple-choice questions, prospective Clients receive a recommended investment allocation comprised of ETFs believed to be appropriatefor their situation. The recommendation is delivered for viewing over the Internet via our website.

In the Cash-Enhanced Robo Portfolios, each portfolio typically consists of less than ten ETFs and approximately 30% of the portfolio is allocated to cash. The Cash-Enhanced Robo Portfolios are not subject to an advisory fee.

Clients also have the ability to select the more fully invested Market-Focused Robo Portfolios, which offer the Core, Income, Socially Responsible and Tax-Optimized models. These modelsare similar to their Cash-Enhanced Robo Portfolios counterparts but with a lower cash allocation of approximately 2%. Ally Invest charges an advisory fee onthe Market-Focused Robo Portfolios.

To become a Robo PortfoliosClient, you must access our secure website,where you will be offered our current Firm Brochure, which describes our advisory firm, its services, potential fees, etc., as well as any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

Invest Simply

Invest Simply portfolios are provided online to a select population of Clients. We do this exclusively through web-based solutions and informational resources and virtual interaction. The Invest Simply advisory service delivers discretionary portfolio management services through investment portfolios made up of ETFs. Each portfolio is designed to provide Clients with an efficient way to invest in the 1 - r b | - t l - u h ; | v 0 - v ; 7 o m ; - 1 _ t b ; m- v t b m 7 o m ê ; 7 k t o l e a n c ê ; a n d liquid net worth. The portfolios are designed for long-term (i.e., one year or more) investing. To get started, we ask prospective Clients to respond to a sequence of interactive questions that are important to the development of their portfolios, such as their investment time horizon, financial goals and objectives, and net worth. We also inquire into their tolerance or appetite for risk.

Following responses to a series of online multiple-choice questions, prospective Clients receive a recommended investment allocation of a portfolio model tracking major asset benchmarks diversified among domestic equity, international equity, domestic fixed income, and international fixed income ETFs. There are five risk models: Conservative, Moderate, Moderate Growth, Growth and Aggressive Growth. Each model iscomprised of four ETFs believed to be appropriate for | _ ; t b ; s i t u a t i o n. The recommendation is delivered for viewing over the Internet via our website.

The Invest Simplyportfolios are not subject to an advisory fee.

To become an Invest Simply Client, you must access our secure website,where you will be offered our current Firm Brochure, which describes our advisory firm, its services, potential fees, etc., as well as any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice.

Personal Advice

The discretionary Personal Advice service is provided via a relationship with a dedicated Financial Advisor to analyze - t b ; m | = v o ^ ; u - t t = b m - m 1 b - t r b 1 | † u ; 7 1 o m v | u † 1 | - = b b m ^ ; v | l ; m | v | u - | ;] b ; v 7 - m 7 l - m -] ; | _ ; t b ; m | = v - v v ; | v - 1 1 o u 7 b m] t ‹ : $ _ ‰ o u h | o] ; | _ ; u | o † m 7 ; u v | - m 7 | _ ; t b ; m | = v ml; goals, -sm7 a]; retirement, = b m education, and consideration of tax and estate planning strategies. The construction of the Personal 7 ^ b 1 ; = b m - m 1 b - t r t - m 0 ;] b m v ‰ b | _ - u ; ^ b ; ‰ o = | _ ; t b ; m | = v 1 o l r t ; | limited to, time hori zon, investment objective, goals, net worth, risk tolerance, current assets (taxable and non-taxable accounts held at Ally Invest or at other financial institutions), any reasonable investment u ; v | u b 1 | b o m v 7 u ; | b u ; l ; m | -] ; 7 0 ; t b ; = v ; 7 -mm=7o u t b - ‡ b ovm| -?]Qv | P > 7 ,uvb=]bmt - r proposal using asset allocation modeling.

$ _ ; b m - m 1 b - t 7 ^ b v o u ‰ b t t r u ; v ; m | - m b m ^ ; v | l ; m | r u o r o v - t 7 ; v b] m utilizing long-term diversified asset allocation portfolio(s) with multipl e asset and sub-asset classes. Each r o u | = o t b o b v 1 o l r u b v ; 7 o = $ v : - 1 _ r o u | = o t b o b v 7 ; v b] m ; 7 | o 1 o Conservative, Moderate, Moderate Growth, Growth and Aggressive Growth.

The Financial Advisor will recommend one or more of the following model portfolios:

- Foundational Portfolios: strategic asset allocations with diversified exposure to stocks and bonds; designed for income yield and diversification;
- Impact Portfolios: diversified asset allocation strategies designed for purpose and impact, such - v ; Š r o v † u ; | o ; m ^ b u o m l ; m | - t 7] o ^ ; u m - m 1 ; - m 7 v o 1 b - t P > " ? Q $
- Thematic Portfolios: diversified asset allocations with an increased allocation in ETFs focusing on specific sectors, emerging themes and technologies.

The Financb - t 7 ^ b v o u b v - 0 t ; | o | - b t o u | _ ; - v v ; | 1 t - v v - m 7 v ; 1 † u b | ‹ ; Š r selecting from a variety of different model portfolios to address specific Client needs. In addition, the Financial Advisor will take into account considerations such as concentrated positions, capital gains tax management, and rebalancing requests when implementing and managing the portfolios.

) ; † | b t b Œ ; - $ † u m h ; ‹ v v ; | - m -] ; l ; m | t - | = o u l r u o ^ b 7 ; u P > $? Q | o service. The TAMP provides a technology platform that features a number of services that we leverage to administer and manage Client accounts, including billing, reporting, trading, and financial planning, as well as an investment management platform offering third-party strategist portfolio model allocations. The TAMP is not affiliated with us or our affiliates, is not a sub-adviser, and does not provide personalized investment advice to our Clients.

Guided Advice

AIA is testing the discretionary Guided Advice service with a selec t population of Clients. The service is designed for Clients with a single investment goal. AIA constructs a simplified Investment Proposal consisting of a recommended portfolio, which is limited to a subset of the Foundational Portfolios des5(e)-13(s)11 0 0 1 36.025 172.6 T1 0 G [(d)5(n)-24(s)1 0g(d)5(n)-24(s1e)-15(l)-13(i)-9(o)-15(s)58( )] TJ I

Other Service Providers

In addition to the Advisory Agreement you enter into with us, our advisory services also require that you open a brokerage account with t t ‹ m ^ ; v | " ; 1 † u b | b ; v P > u o h ; u ? Q 7 - ‰ _ o t Ally Invest Group and affiliate of AIA. You will need to complete a brokerage account application and -] u ; ; | o u o h ; u = v 0 u o h ; u -] ; -] u ; ; l ; m | | o l - b m | - b m | _ ; - v v ; | v - m 7 ; = = ; 1 r ; Š t ; - u b m] o u r C u s t o d i a n ? Q P unaffiliated broker- 7 ; - t ; u 7 - 1 | v - v u o h ; u = v 1 t ; - u

In the absence of a reportable market value for any asset in your account, we may seek a third-party opinion from a recognized industry source (e.g., a public accounting firm).

The AUM calculation does not include funds awaiting investment through a Dollar Cost Averaging plan or funds segregated for account withdrawal.

4. Guided Advice

The minimum initial deposit is $25,000. Our compensation is based on an annualized asset-based fee. The annual fee of 0.50% is typically billed monthly, in arrears.

Our advisory fees are calculated by multiplying the average daily balance of the account by the fee rate (i.e., 0.50% multiplied by days in billing cycle, divided by 365).

Payment of Fees

Fees are billed monthly in arrears and fee payments are generally withdrawn from your account by the end of the following month. We do not accept cash, money orders, or similar forms of payment, nor do we allow for direct billing. Your first billing cycle begins once the Robo Portfolios and Invest Simply Advisory Agreement or Personal Advice and Guided Advice Advisory Agreement, as applicable (each, - m > 7 ^ b v o u <] u ; ; l ; m | ? Q 7 b v ; Š ; 1 † | ; 7 - m 7 - v v ; | v _ - ^ ; 0 ; ; m b m ^ ; v | ; prorated based on the remaining days in the reporting period in which we service the account. All fees deducted will be clearly noted on account statements that you receive from Custodian (as defined

Item 6 KPerformance-Based Fees and SideBy-Side Management

AIA does not receive performance-based fees or participate in side-by-side management. Performance 0-v;7 =;;v -u; =;;v |_-| -u; 0-v;7 om - v_-u; o= 1-rb|-t]-bmv ou 1-rb| Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described inItem 5 KFees and Compensationand not on the basis of any share of capital 3(ap).y

household has satisfied at least $5,000 of the initial investment requirement, whether in a single account or across multiple accounts, and all required documents have been reviewed and approved, we will implement the recommended portfolio(s). If the market value of the household relationship falls below $100,000 or any account value falls below $1,000 and stays below the required minimum for a significant period of time, we reserve the right to terminate the advisory relationship.

+ o † l - ‹ - t v o 1 _ o o v ; | o ; v | - 0 t b v _ - o t t - u o v | ˆ ; u -] b m] P > ? Q r t - m : at least $100,000 into the DCA account. We will typically invest your money at regular intervals and equal amounts over a specified period. Advisory fees will begin to accrue on invested amounts starting.

We may negotiate, reduce, or waive these minimum investment requirements for certain Clients in our sole discretion. If we do so, we will not be obligated to provide notice or a corresponding adjustment to you or any other Client.

4. *Guided Advice*

The minimum initial investment requirement is $25,000. Once the Client has satisfied at least $5,000 of the initial investment requirement and all required documents have been reviewed and approved, we will implement the recommended portfolio. If the market value of the account falls below $25,000 for a significant period of time, we reserve the right to t erminate the advisory relationship.

We may negotiate, reduce, or waive these minimum investment requirements for certain Clients in our sole discretion. If we do so, we will not be obligated to provide notice or a corresponding adjustment to you or any other Client.

Account Opening Process

To help the government fight the funding of terrorism and money -laundering activities, federal law u ; t † b u ; v u o h ; u | o ˆ ; u b = ‹ o † u t b ; m | v = b 7 ; m | b | b ; v : = u o h ; u b v m o | at account opening or at any other point in the course of the advisory relationship, we will restrict the account from trading and the billing of fees until the restriction is resolved.

1. *Robo Portfolios and Invest Simply*

Instructions for funding the account will be p rovided interactively on the website during the account opening process. Once the minimum investment level for the specified allocation is reached, the available cash will be allocated.

2. *Personal Advice and Guided Advice*

Instructions for funding will be pro vided during the account opening process. Once the minimum investment level for an account is reached, the available cash will be allocated.

Deposit of Securities to Fund Account KLiquidation

We will have discretionary authority over any securities you tr ansfer into your account from another broker-dealer. We will typically liquidate all non-ETF securities and any ETFs that are deemed incompatible with the recommended portfolio. A deposited ETF that is a component of the recommended model portfolio can generally be retained, provided the size of the position is consistent ‰ b | _ | _ ; $ = v ‰ ; b] _ | b m] ‰ b | _ b m | _ ; l o 7 ; t : = ‹ o † 7 ; r o v b | ! ; v | u b 1 | ; under the Securities Act of 1933), non-standard assets, options, derivatives, or other similar securities, we will attempt to liquidate them, subject to regulatory requirements.

The cash generated from such liquidations will be invested in the appropriate model portfolio, assuming the investment minimums are met. You are responsible for seeking the advice of a tax professional prior to depositing securities that are not part of the model portfolio into your account. Liquidation of securities deposited may be subject to capital gains. You are responsible for all taxes as well as any early surrender/sales loads for mutual funds transferred to the account and subsequently liquidated for investment. No commissions will be charged on the sale of the securities, but your prior broker-dealer may charge you fees for the transfer of your securities.

1. *Robo Portfolios and Invest Simply*

Liquidations will be effected after the opening and acceptance of your account and after the eligible securities are received in good order (certain securities may require additional paperwork) atthen-prevailing market prices.

2. *Personal Advice*

If you fund your account with ETFs transferred in from elsewhere, you will work with the Financial Advisor to review the securities to address your specific needs, and the Financial Advisor will take into account considerations such as concentrated positions and capital gains tax management when liquidating the securities as part of the investment proposal process. Any ETFs that are not a component of the recommended model portfolio will be reviewed for compati bility with the portfolio based on an established list of acceptable substitutes. Clients who commit to investing assets of $1,000,000 or more (at a household level) with Personal Advice may request bespoke research in order to determine whether a deposited ETF that is neither a component of the recommended portfolio nor on the established list of acceptable substitutes is compatible with the recommended portfolio and can therefore be retained.

3. *Guided Advice*

If you fund your account with ETFs transferred in from elsewhere, you will work with the Financial Advisor to review the securities to address your specific needs and the Financial Advisor will take into account considerations such as concentrated positions and capital gains tax management when liquidating the securities aspart of the investment proposal process. Any ETFs that are not a component of the recommended model portfolio will be reviewed for compatibility with the portfolio based on an established list of acceptable substitutes.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Investment Methodology

Client Tailored Services

1. *Robo Portfolios and Invest Simply*

You will be asked to provide personal information to assist us in recommending a portfolio suited to your particular circumstances. While the accuracy of the data you provide is important to the investment recommendation, we are not required to verify any such data and are entitled to rely on your representations. Investment advice is limited to accounts managed by AIA and does not take into consideration accounts held outside of AIA.

You retain discretion over the initial implementation decisions and are free to accept or reject our initial recommendation. **If you are a Robo Portfolios Client and decide to reject the recommended portfolio and select an alternative portfolio, it is at your own risk.**

Once you have selected a portfolio, you must open an account with Broker in order to participate in the investment program. You must authorize us to exercise discretionary trading authority over that account. Once the portfolio allocation has been selected, we will exercise our discretionary authority to execute trades for the initial allocation of the selected portfolio, including the liquidation of any securities deposited or transferred into the account, and also for ongoing rebalancing. We will monitor the accoun | v - m 7 l - ‹ u ; 0 - t - m 1 ; P - Q = o u > 7 u b = | 7 ? P 0 Q = o u 7 ; r o v b | v - m 7 for advisory fees, and (d) if we make a change to the underlying investment allocations. We do not have the authority to remove funds or securities from your account and may only request the withdrawal of our advisory fees.

2. *Personal Advice*

You will be asked to provide personal information to assist your Financial Advisor in recommending a tailored financial plan and related portfolio(s). The Personal Advice investment proposal takes into consideration accounts managed by AIA and accounts held elsewhere. Therefore, it is important that you notify your Financial Advisor of any changes to your goals and Profile Information that could affect the appropriateness of the investment proposal. While the accuracy of the data you provide is important to the investment recommendation, we are not required to verify any such data and are entitled to rely on your representations.

Once you have accepted the investment proposal, you must open an account with Broker in order to participate in the Personal Advice service. You must authorize us to exercise discretionary trading authority over that account. Once you have accepted the investment proposal, we will exercise our discretionary authority to execute trades for the initial allocation of the selected portfolio, including the liquidation of any securities deposited or transferred into the account, and also for ongoing rebalancing. We will monitor the accounts and may rebalance P - Q = o u > 7 u b = | 7 ? P 0 Q = o u 7 ; r o v b | v free up cash to pay for advisory fees, and (d) if we make a change to the underlying investment allocations. We do not have the authority to remove funds or securities from your account and may only request the withdrawal of our advisory fees.

3. *Guided Advice*

You will be asked to provide personal information to assist us in recommending a portfolio. It is important that you notify us of any changes to your goals and Profile Information that could affec t the appropriateness of the investment proposal. While the accuracy of the data you provide is important to the investment recommendation, we are not required to verify any such data and are entitled to rely on your representations.

Once you have acceptedthe investment proposal, you must open an account with Broker in order to participate in the Guided Advice service. You must authorize us to exercise discretionary trading authority over that account. Once you have accepted the investment proposal, we will exercise our discretionary authority to execute trades for the initial allocation of the selected portfolio, including the liquidation of any securities deposited or transferred into the account, and also for ongoing rebalancing. We will monitor the acco † m | v - m 7 l - ‹ u ; 0 - t - m 1 ; P - Q = o u > 7 u b = | 7 ? P 0 Q = o u free up cash to pay for advisory fees, and (d)if we make a change to the underlying investment allocations. We do not have the authority to remove funds or securities from yo ur account and may only request the withdrawal of our advisory fees.

Taxes

1. *Robo Portfolios and Invest Simply*

While we do not take your personal tax situation into consideration when managing the Robo Portfolios and Invest Simply portfolios, we may offer tax-advantaged products in the Robo Portfolios service that you can select. We do not provide tax advice. You may be subject to capital gains or losses as part of AIA investment management. We do not monitor for wash sales in your account. We recommend that you consult with your personal tax professional before engaging in any tax strategy.

2. *Personal Advice*

Performance reports are for informational purposes only and are not intended to replace statements or confirmations, which are the official account records provided by Custodian. You will receive electronic account statements prepared by Custodian on at least a quarterly basis. We do not create account statements for Clients, and we urge you to carefully review statements you receive from Custodian for accuracy.

Risk Considerations

We do not warrant or guarantee any particular level of account performance or that an account will be profitable over time. Past performance is no guarantee of future results.

Except as may otherwise be provided by law, we are not liable for: (i) any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (ii) any loss arising from our following of any directions by you or your attorney-in-fact; or (iii) any act or failure to act by a service provider maintaining an investment account.

Federal and state securities laws impose liability under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document or any Advisory Agreement is intended to act as a waiver of any rights that you may have under federal and state securities laws.

Our investment portfolios are designed to produce the appropriate potential return for the given level of risk. However, we cannot

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Management Risk

An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

Market Risk

When the stock market as a whole, or an industry as a whole, falls in value, it can cause the prices of individual stock prices to fall indiscriminately. This is also called *systemic* or *systematic* risk.

Passive Investing

A portfolio t _ - | ; l r t o ‹ v - r - v v b ^ ; 7 > ; = = b 1 b ; m | l - u h ; | v ? - r r u o - 1 _ P] ; m ; u - investing) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may deviate from the average return for the asset class. We believe this variance from the expected return is generally low under normal market conditions when a portfolio is made up of diverse, low-correlated or non-correlated assets.

Performance of Underlying Managers

We select ETFs based on a variety of criteria. However, we depend on the manager of such investment vehicles to select individual investments in accordance with their stated investment strategy. Should a manager deviate from such norms, or do a poor job of selecting investments, a given investment might underperform or face enhanced risk.

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by the selected vendors, rating services, market data, and the issuers themselves. Therefore,while we make efforts to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided, which could affect the advice regarding, or investment management of, an account.

ETF-Specific Risks

Our asset selection process seeks to identify ETFs that exhibit high liquidity, low expenses, and low tracking error. Our selection process does not guarantee the quality of a particular ETF or that it will (1) be profitable, (2) properly track any comparable index, (3) trade in a liquid fashion, or (4) trade at or above its publicly posted net asset value. We reserve the right to change the selection of ETFs we recommend at any time. Changes in our selection of ETFs may result in the sale of existing holdings and could subject you to additional tax liability.

The risk of owning ETFs reflects the risks of their underlying securities (e.g., alternative investments, stocks, bonds, etc.). ETFs also carry additional expenses based on their share of operating expenses and

1;u|-bm 0uoh;u-];=;;v Po=|;m u;=;uu;7 |o -v >;Šr;mv; u-|bov?Q7 duplication of certain fees.

Tax-Loss Harvesting Risks

The optional TLH service has potential risks. The value of TLH will vary depending on your personal financial circumstances. Although we take your personal tax situation into account as part of the TLH service,

Index Investing

m 7 ; Š b m ˆ ; v | b m] _ - v | _ ; r o | ; m | b - t | o 0 ; - = = ; 1 | ; 7 0 ‹ > - 1 | b ˆ ; u b v h ? P o
risk of deviation from a stated benchmark. If a portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a > v - l r t ; ? o u > o r | b l b Œ ; 7 ? b m 7 ; Š = y h o t 7 a s o l o u s e l y $ a l i g h _ t o | t h e - s t a t e d benchmark as intended. In these instances, a portfolio manager may choose to reduce the weighting of a satellite _ o t 7 b m] 7 † | b t b Œ ; ˆ ; u ‹ - 1 | b ˆ ; v - | ; t t b | ; v 7 o u † v ; - > u ; r t b 1 - | ; b m o 7 ; Š ? minimize the effects of the tracking error in relation to the overall portfolio.

Socially Responsible Investing Risk

Item 9 - Disciplinary Information

Neither AIA nor any member of its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory o u] - m b Œ - | b o m r u o 1 ; ; 7 b m] | _ - | ‰ o † t 7 u ; = t ; 1 | r o o u t ‹ † r o m = v - 7 ˆ b v

Item 11 - Code of Ethics and Conflict of Interest

We have adopted a Code of Ethics that establishes policies for ethical conduct for all our personnel and

v _ - u ; v † 1 _ 1 o l r ; m v - | b o m ‰ b | _ † v :) ; l o m b | o u u o h ; u = v ; Š ; 1 † | b o m
obligation to obtain as favorable pricing as possible under prevailing market conditions.

Item 13 - Review of Accounts

We provide all Clients with continuous access to their account information and documents via our website. Clients also receive periodic email communications describing account information, product features, and portfolio performance.

Personal Advice Clients are free to contact their Financial Advisor and dedicated service team at any time during normal business hours via telephone, email, or mail. Generally, the issuers or sponsors of the investments and the TAMP are not available to answer questions or discuss specific investment issues.

It is your ongoing responsibility to promptly update us when there is a material change to your situation or investment objective, so we can evaluate and potentially revise previous portfolio recommendations.

1. *Robo Portfolios, Invest Simply, and Guided Advice*

We periodically review the ETFs used for Client portfolios via our Investment Committee. The m^;v|l;m| ollb||;; bv 1olrubv;7 o= =v ru;vb7;m| -m7 1;u|-bm o| personnel who review any modifications to the ETFs chosen for the portfolios or any newly created portfolios. Implementation of any such modification is approved by the voting members of the Investment Committee, who are all supervised persons of AIA.

Non-periodic reviews may be performed by assigned staff or our programmed systems in response to material market, economic, or political events, or by changes in a Client's financial situation (e.g., changes in employment, relocation, an inheritance, etc.). You should consider revisiting previously entered data to update your information if a material event has occurred so that we can review and potentially adjust your portfolio.

AIA will inquire about changes in your financial situation or objectives or if you wish to discuss any investment restrictions informally on a quarterly basis and more formally on an annual basis.

2. *Personal Advice*

At a minimum, your Financial Advisor will offer a meeting with you once per year to review the investment proposal. During the meeting, the Financial Advisor reviews the performance of your investment proposal and discusses any changes to your goals and Profile Information that may impact your investment proposal. In addition, accounts are reviewed on a periodic basis to determine if market movements or other Client Profile Information changes necessitate an account review and potential update to the investment proposal. You should notify your Financial Advisor of any changes to your goals and Profile Information that could affect the appropriateness of the investment proposal. Clients may request an additional review at any time.