

**Broker-Dealer and Registered Investment Advisor Fee Disclosure
of the Transamerica Financial Group Division of TFA**

This disclosure summarizes fees and other compensation received by Transamerica Financial Advisors, Inc. (“TFA”)¹ for providing services to retirement plans subject to the Employee Retirement Income Security Act of 1974 (“ERISA”). Also included is a description of compensation received by representatives associated with TFA through its Transamerica Financial Group (“TFG”) Division who may be registered to solicit or sell (“registered representatives”) or to provide investment advice (“investment advisor representatives”) regarding the purchase or sale of securities in plan accounts or may act as solicitors (“solicitors”) assisting plan sponsors, plan trustees, or plan fiduciaries (collectively “plan fiduciaries”) in identifying investment advisors to manage or perform asset allocation services for plan accounts.

This disclosure is designed to assist you in your role as a plan fiduciary in understanding the cost of services provided by TFA and its registered representatives, investment advisor representatives and solicitors to the retirement plan.

Fiduciary Status

As detailed below and in its written Client Agreements, TFA and its registered representatives, investment advisor representatives, and solicitors (collectively “Representatives”) act as fiduciaries under Section 3(21) of ERISA when providing investment advice services for a fee or commission to ERISA covered plans. Generally such investment advice services may be offered to ERISA covered plans under the terms of a written agreement; however, depending on the product or service offered to the plan, a written agreement may not be necessary. In these roles, TFA and its Representatives make recommendations to the plan fiduciary, but, as detailed below, in most cases the plan sponsor decides whether to accept that advice or select a different investment or service.

In addition, if an ERISA covered plan subscribes to services offered through the Transamerica I-Series[®] Program within the Transamerica Wealth Management StrategiesSM Program, TFA will act as a fiduciary under Section 3(21) of ERISA in connection with managing the asset allocation model portfolios in which your plan assets may be invested. In this role, TFA has assumed responsibility for its investment decisions which are exercised with discretion, that is, no prior approval from the plan or participants is required.

In limited circumstances, TFA investment advisor representatives may also act as ERISA fiduciaries under Section 3(38) of ERISA, when the plan fiduciary delegates, in writing, to the investment advisor representative, authority to manage the plan’s account. In these cases, the terms of the written agreement delegating such authority describe the scope of these responsibilities.

¹ TFA is a broker-dealer and investment advisor registered with the Securities and Exchange Commission and a member of the Financial Industry Regulatory Authority. It is licensed to solicit and sell securities and provide investment advice in all fifty states.

TFA and its Representatives provide other non-fiduciary services to the plan or plan participants, including evaluating and determining the educational needs of plan sponsors and plan participants, providing investment education, facilitating plan enrollment, preparing periodic reports regarding enrollment and the performance of funds, acting as a solicitor for third party money managers, or consulting and providing information about asset allocation and investments options available to your plan. These services, and any compensation received for these services, are also discussed in this brochure.

Fees and Services

The manner of receipt of the compensation outlined in this disclosure (e.g., direct billing, deduction from plan accounts, charges against plan investments or payment provided by a third party) will depend on the services provided. Although it is intended to provide information regarding all material fees, this document may not be comprehensive; this brochure also may not include full information on fees associated with some specially negotiated services or with certain investment options. Any fees and expenses described in this disclosure are estimates; not all plans may be paying for or receiving all of these services

For detailed information about the services provided to your plan, the fiduciary capacity of persons providing the services, and costs associated with these services, please refer to the relevant plan documents, client advisory and investment management agreements, provider fee disclosures, commission and fees schedules, or prospectuses (for variable annuity funding vehicles and mutual fund platforms) and disclosure documents filed with the Securities and Exchange Commission (SEC). These disclosure documents (i.e. Part 2A of TFA’s TFG Division Form ADV and Appendix 1, and the Wrap Fee Brochure for the Transamerica Wealth Management StrategiesSM program) are all available through the EDGAR system on the SEC’s website available at this link:

http://www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_OrgSearch.aspx?SearchGroup=Firm&IndlText=&FirmText=Transamerica+Financial+Advisors&PageNumber=1

Description of Services	Where to find a description of fees and costs associated with these services
<p>Transamerica Wealth Management StrategiesSM Program</p> <p>Through its investment advisor representatives, TFA’s TFG Division offers the Transamerica Wealth Management StrategiesSM Program to assist clients, including plan sponsors, trustees or fiduciaries (collectively “plan fiduciaries”) in the development of the investment menu and allocation of assets in plan accounts.</p> <p>In accordance with the terms of the Client Agreement for the Transamerica Wealth Management StrategiesSM Program, TFA investment advisor representatives gather from plan fiduciaries, financial</p>	<p><i>Cost of Advisory Services.</i> Services offered through the Transamerica Wealth Management StrategiesSM Program are available for a single “Total Account Fee” (paid monthly in arrears) that covers advisory and certain administrative services calculated based upon assets under management, up to a maximum fee amount allowable. The “Total Account Fee” payable under these agreements includes the advisory fee and certain administrative fees associated with the plan’s accounts (including custodial and brokerage fees, and, where specified, account monitoring fees). Any fees debited will appear on</p>

information, investment objectives, goals and any reasonable restrictions that the third party money manager might need to observe in managing plan assets, including whether to hold or liquidate all or a portion of assets to maintain in cash and cash equivalents, until the plan fiduciary provides further direction. A TFA investment advisor representative completes a questionnaire based upon the gathered information and evaluates the suitability of the Transamerica Wealth Management StrategiesSM Program for the account(s) opened by the plan fiduciary. In performing his/her suitability analysis, the investment advisor representative relies upon the information provided by the plan fiduciaries. If the Transamerica Wealth Management StrategiesSM Program is deemed to be suitable by the investment advisor representative and subsequently by TFA, the investment advisor representative will assist the plan fiduciary in completing and forwarding account paperwork to the custodian or administrator responsible for establishing and maintaining the plan account(s). The TFA investment advisor representative will also utilize his/her preferred asset allocation techniques to develop an investment strategy for the plan account, based upon, among other things, the plan's investment objectives, risk tolerance, time horizon, goals and any reasonable restrictions. TFA and its investment advisor representatives are available to receive ongoing deposit and withdrawal instructions and to ascertain any changes in the plan's financial circumstances and investment objectives.

A TFA investment advisor representative will meet with the plan fiduciary at least annually to review the plan's stated investment objectives, risk tolerance, goals and any reasonable restrictions in order to assess whether or not the program is still suitable for the plan.

Under the terms of the Transamerica Wealth Management StrategiesSM Program Client Agreement, plan fiduciaries authorize TFA to, at the plan fiduciaries' direction, purchase, sell or redeem securities in the plan accounts (including no load and load-waived mutual funds, stocks, bonds and exchange traded funds) through the selected clearing firm, Foliofn.

Plan assets invested in the Transamerica Wealth Management StrategiesSM Program are held with the

the account statement provided by the plan account custodian, Foliofn. See also the "Transamerica Wealth Management StrategiesSM Program Client Agreement" for details regarding services provided by TFA and its investment advisor representatives and related fees/costs based upon assets under management up to a maximum fee amount allowable. TFA's TFG Division Form ADV Part 2A, Appendix 1 also contains information regarding the services and costs associated with the Transamerica Wealth Management StrategiesSM Program.

Transaction/Ticket Charges. Transaction fee/ticket charges for the Transamerica Wealth Management StrategiesSM Program are included in the Program Fees listed in the Wrap Fee Brochure and Client Agreements. These charges are detailed in confirmations and monthly account statements issued by the custodian.

Costs associated with investments. Certain other charges are imposed by parties other than TFA in connection with investments made through the account including without limitation, the following types of charges which are generally charged by mutual funds and fully disclosed in the prospectus for each fund: 12(b)-1 fees, management fees and administrative servicing fees, other transaction charges and service fees, and IRA and qualified retirement plan fees.

Additional Compensation to TFA and its registered representatives. See Brokerage Services and Commissions, Non-Cash Compensation and Revenue Sharing from the Sale of Securities sections below. Compensation for services outside the scope of the Client Agreement performed in TFA's capacity as a broker-dealer or in the representative's capacity as a registered representative of TFA are not included in the advisory fee and are discussed in the product provider's Section 408(b)(2) service provider disclosure or, for New York clients, in the representative's separate Compensation Disclosure, where applicable.

Advisory fees for participation in TFA's Advisory Programs are deducted from plan assets and are direct compensation paid to TFA.

<p>clearing firm Foliofn. Foliofn is not affiliated with TFA.</p> <p>Under the terms of your Transamerica Wealth Management StrategiesSM Program Client Agreement, you authorize the custodian to debit your account monthly for advisory fees paid to TFA, its investment advisor representative, any third party money manager or other third parties designated by the plan fiduciaries.</p> <p>To the extent that a plan fiduciary contracts on behalf of the plan for investment advisory services in one of the Transamerica Wealth Management StrategiesSM Program, TFA and its investment advisor representative act as fiduciaries under Section 3(21) of ERISA when providing investment advice, for a fee, pursuant to a written agreement.</p>	
<p>Variable Product Advisory Program</p> <p>TFA also offers a variable product advisory program to assist plan fiduciaries and participants in the selection, rebalancing and reallocation of subaccount investments, including in qualified plans funded by variable annuities. TFA may offer its variable product advisory program on variable products issued by affiliated² and unaffiliated product offerors. For details regarding the services provided, see the “Services Rendered” section of the “Client Services Agreement for Third-Party Advisory Services for Variable Products”.</p> <p>To the extent that a plan fiduciary contracts on behalf of the plan for investment advisory services in connection with the Variable Product Advisory Program, TFA and its investment advisor representative act as fiduciaries under Section 3(21) of ERISA when providing investment advice, for a fee, pursuant to a written agreement.</p>	<p>For details regarding the fees and compensation associated with providing advisory services to the “Client Services Agreement for Third-Party Advisory Services for Variable Products” provided at the time of purchasing these services, TFA’s Form ADV Part 2A, and the Section 408(b)(2) Service Provider from the relevant product provider.</p> <p>Fees for TFA’s advisory services are paid quarterly in advance, or arrears depending upon the specified program selected. Total Annual Advisory Fee and variable product expenses including Mortality and Expense, Administrative Charges, and Product Rider or Enhancement Charges may not exceed 3.00%. The variable product’s Variable Subaccount Operating Expenses are not included within the 3.00% maximum Total Annual Advisory Fees Charged and variable product expenses and will increase the total fees incurred by the plan. The Total Annual Advisory Fee does not include the fees and expenses charged by the variable product issuer such as Mortality and Expense, Administrative Charges, and Product Rider or</p>

² TFA offers variable annuities and variable life insurance products underwritten by the following affiliate insurance companies: Transamerica Life Insurance Company, Transamerica Life Insurance Company of New York, Western Reserve Life Assurance Co. of Ohio, Transamerica Advisors Life Insurance Company, and Transamerica Advisors Life Insurance Company of New York.

	<p>Enhancement Charges, or Variable Subaccount Operating Expenses. For a more complete description of these fees and expenses, please refer to your variable product account establishment paperwork, variable annuity prospectuses and underlying fund prospectuses. See also the Section 408(b)(2) Service Provider Disclosure of the relevant product provider.</p> <p>If a plan or plan participant terminates the advisory relationship with TFA or a TFA Advisor in accordance with the terms of the Advisory Agreement, TFA and its advisors will follow the instructions of the plan or participant in distributing the assets of, and closing, the account. The plan/participants will receive a prorated refund of any pre-paid account advisory fee based upon the number of days remaining in the quarter</p> <p><i>Additional Compensation to TFA and its registered representatives.</i> Compensation for services outside the scope of the Client Agreement which are performed in TFA’s capacity as a broker-dealer or in the representative’s capacity as a registered representative of TFA are not included in the advisory fee and may be found in the product provider’s Section 408(b)(2) service provider disclosure or, for New York clients, in the representative’s separate Compensation Disclosure, where applicable See also the discussions below regarding Brokerage Services and Commissions, Non-Cash Compensation and Revenue Sharing from the Sale of Securities.</p> <p>Advisory fees for participation in TFA’s Variable Product Advisory Program are deducted from plan assets and are direct compensation paid to TFA.</p>
<p>Brokerage, Execution, Custodial Clearance and Administrative Services</p> <p>As an introducing broker-dealer, TFA does not clear, custody, administer or execute securities transactions. Any transaction requests received from a plan fiduciary are promptly forwarded to the clearing or custodial firm with responsibility for the account.</p> <p>TFA has entered into a fully disclosed clearing agreement with Pershing LLC. ERISA brokerage</p>	<p>Details regarding the costs of execution, clearance and administrative services associated with the plan accounts cleared through Pershing or through Foliofn may be found in the written clearing or custody agreement the plan enters into with these firms. Costs and charges assessed against the account are detailed in confirmations, monthly or quarterly account statements, as</p>

<p>accounts opened through TFA will be cleared and custodied at Pershing. TFA or its Representative is responsible for directing your purchase and sale transactions through Pershing. Pershing is not affiliated with TFA. Pershing charges and collects any Transaction Charges and processes deposits to and withdrawals from the account. Pershing will forward trade confirmations to the plan fiduciary as transactions occur and issue account statements at required intervals. Account statements are sent monthly if activity occurs during the month, otherwise account statements are provided quarterly.</p> <p>For ERISA accounts invested in the Transamerica Wealth Management Strategies Program, you appoint Foliofn Investments, Inc. as your exclusive broker-dealer and custodian at account opening. Your securities transactions will be executed through and your assets held at Foliofn. TFA or its investment advisor representative is responsible for directing your purchase and sale transactions to Foliofn. Foliofn charges and collects the Total Account or advisory fee and any Transaction Charges and processes deposits to and withdrawals from the account. You may access trade confirmations, account statements, and performance reports from Foliofn's website.</p> <p>Orders for the purchase, sale or exchange of variable annuities, mutual funds or exchange traded funds will be forwarded by TFA to the product provider or custodian/trustee as required by the terms of any TFA Client Agreement.</p>	<p>applicable, distributed by the respective clearing firm. See also, the current TFA Client Brokerage Account Fee Schedule for the costs of services, including transaction costs, for accounts custodied and cleared through Pershing, LLC and comparable schedules for other of the plan's custodians provided at the time of account opening and updated periodically thereafter. In the event of account termination, these transaction charges are not refunded, having been assessed in arrears for services previously provided.</p> <p>These transaction charges are in addition to any fees charged for investment advice, solicitation, consultation, money management, or account maintenance fees and are unrelated to any compensation TFA or its investment advisor representatives receive.</p> <p>Certain services associated with the plan account are offered at no additional charge, including online account viewing, online statements and confirmations, consolidated statements, electronic deposits/withdrawals via ACH, journaling of assets between brokerage accounts with written authorization, payroll direct deposit, Select Link of multiple accounts held for the same household and periodic/systemic investment and liquidation of certain mutual funds.</p> <p>The cost of these services for variable annuities, mutual funds or exchange traded funds is detailed in the applicable account paperwork and product and underlying fund prospectuses.</p>
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<p>Third-Party Money Management Services and Solicitation</p> <p>TFA and its solicitors may assist plan fiduciaries in evaluating the suitability of the services of certain third party money managers for the plan (e.g. Flexible Plan Investments, Ltd., Hanlon Investment Management, Inc., CLS Investment Firm, LLC, Fund Architects, Curian Capital, LLC, Horizon Investment, LLC, OAM Avatar, LLC, Pinnacle Advisory Group, LLC, and Manning and Napier) (collectively “Third Party Money Managers”). If the plan fiduciary elects to engage a Third Party Money Manager, the plan will contract directly with, and pay advisory or management fees for services directly to, the Third Party Money Manager. To the extent that TFA or its investment advisors assist in the solicitation of money management services, the Third Party Money Manager may elect to pay a portion of its advisory fee to TFA, and to the investment advisor who acted as a Solicitor for the Third-Party Money Manager.</p> <p>TFA solicitors or investment advisor representatives may provide plan or employee investment education or on-site training or facilitate the delivery of advertising or marketing materials. Information distributed by TFA investment advisor representatives may include, the third-party money manager’s written Disclosure Document, Brochure or Part 2A of the firm’s Form ADV, descriptive literature, marketing materials and prospectuses or offering memoranda pertaining to investments managed or offered through the manager.</p> <p>For a description of services provided by persons associated with TFA who act as Solicitors of Third Party Money Managers, see TFA’s “Client Agreement for Investment Advisory Services of Third Party Money Managers”, the Solicitation Disclosure of the selected money managers, and TFA’s Form ADV, Part 2A.</p> <p>To the extent that TFA and TFA investment advisor representatives receive a fee for soliciting advisory services on behalf of third party money managers, they may be fiduciaries under Section 3(21) of ERISA.</p>	<p>Fees for third party money management are established by the Third Party Money Manager and disclosed in the Third Party Money Manager’s Form ADV, Part 2A or Disclosure Brochure and its investment advisory agreements.</p> <p>Third Party Money Managers will typically require plan fiduciaries to authorize automatic fee deduction from the account. Refer to the Third Party Money Manager’s Form ADV Part 2A or other Disclosure Brochure for a complete discussion of the fees and termination procedures associated with the particular Third Party Money Manager program.</p> <p>If there are solicitors involved in helping plan fiduciaries select a money manager, the identity of the solicitor, his or her compensation and payment for services is disclosed in the Third-Party Money Manager’s Solicitor Disclosure Statement. The total fee charged to the client by the respective Third Party Money Manager (including TFA’s portion of the fee) will not exceed 2.6% annually.</p> <p>Solicitation fees are indirect compensation paid by the Third Party Money Manager to TFA and/or its representatives engaged in soliciting, from amounts paid by the plan to the money manager.</p> <p>In the event that the plan terminates third party money management services or otherwise obtains a refund of advisory fees, solicitation fees paid to TFA or its Representatives will be refunded to the money manager for handling in accordance with the terms of any contracts between the manager and the plan.</p>
<p>Investment Expenses</p> <p>Plan accounts may also incur certain charges imposed by third parties other than TFA in connection with</p>	<p>For a complete discussion of the fees, expenses and charges, including the annual operating</p>

<p>investments made through the account, including, without limitation, the following types of charges which are generally charged by mutual funds and variable product providers, and fully disclosed in the prospectus for each fund: administrative fees, management fees, other fund expenses, distribution fees, 12b-1 fees, transaction charges, costs of insurance, mortality and expense charges, rider fees, transfer fees, exchange fees, account fees, purchase fees, portfolio fees and expenses, sales loads, and redemption fees. Your plan may also pay an initial or deferred sales charge or surrender fee.</p> <p>TFA and its Representatives are not fiduciaries with respect to services provided by third party money managers to underlying funds in these investments.</p>	<p>expenses (e.g., expense ratio); charges related to the acquisition, sale, transfer of, or withdrawal from the investment option; and any other ongoing expenses associated with the underlying investment options, consult the applicable prospectus offered by the product provider, including the “Fees and Expenses” section. See also the Section 408(b)(2) Service Provider disclosure provided by the product provider.</p> <p>See also the discussion below on “Commissions, Cash and Non-Cash Compensation and Revenue Sharing from the Sale of Investments” for more information about these payments in the context of ERISA plan accounts.</p>
<p>Commissions, Non-Cash Compensation and Revenue Sharing from the Sale of Investments</p> <p>TFA and its registered representatives are compensated in different ways when selling a mutual fund³, or variable insurance product held in the plan account depending on the amount invested and/or share class purchased. To the extent that TFA acted as an introducing broker and TFA registered representatives solicited or sold securities purchased or held by the plan, TFA and/or its registered representatives may have received commissions and, in the case of variable annuities, exchange traded funds or mutual funds, may continue to receive “trail” commissions from these sales.</p> <p>TFA and its representatives may receive additional compensation or payments (known as “revenue sharing”) from the sale of products issued by a select group of sponsors with whom TFA maintains unique relationships. For more information on revenue sharing and the providers from which TFA receive revenue sharing, see TFA’s “Revenue Sharing Arrangements and Payments by Sponsoring Companies Client Disclosure Statement”(“TFA’s Revenue Sharing Disclosure”) available on TFA’s website at this link: http://www.transamericafinancialgroup.com/new/transamericafinancial/pdf/TFA_REVENUE_SHARING_12-21-11.pdf?advisorid=3007552</p>	<p>In general, ERISA rules prohibit an investment advisor firm and investment advisor representative to an ERISA plan from imposing advisory fees on assets for which the firm or representative also receive commissions or participates in revenue sharing. As a result, these payments are rebated to the plan account. Consult the relevant Client Agreement for the treatment of any trail commissions or revenue sharing payments for securities held by ERISA plans where TFA or its investment advisor representatives is currently receiving an advisory fee.</p> <p>Commissions and other charges associated with the purchase of these products are dictated by the investment companies, their distributors, and/or the broker-dealers through which these transactions are executed. All sales charges and expenses are disclosed in the product prospectus or offering memorandum, which the plan sponsor or participant will receive at or before the time of purchasing the product. When a TFA registered representative executes general securities transactions for the plan, the representative’s commissions or markup (i.e. for fixed income investments) associated with the transaction is</p>

³ TFA offers mutual funds issued by both affiliated and unaffiliated companies. Transamerica Funds may be held in the plan account. Transamerica Funds are advised by Transamerica Asset Management, Inc., an affiliate of TFA.

<p>TFA representatives may also be eligible for additional compensation based upon sales of sponsored companies or other providers products, and may receive direct or indirect additional cash benefits and non-cash compensation or reimbursements from TFA, or its affiliates or sponsoring companies or other product issuers, including but not limited to reimbursements for sales and/or public seminars and advertising expenses.</p> <p>Neither TFA nor its Representatives act as ERISA fiduciaries when soliciting and selling securities, or receiving commissions, revenue sharing, cash or non-cash compensation from the sale of securities.</p>	<p>disclosed in the trade confirmation.</p> <p>For more information on commissions paid to registered representatives involved in the sale of securities held by the plan, consult the Section 408(b)(2) service provider disclosures distributed by the product providers (i.e. variable annuity contract or mutual fund issuers).</p> <p>For more information on noncash compensation, contests or other incentives from product providers, consult the relevant product provider’s and underlying fund prospectuses.</p>
<p>Educational and Enrollment Services</p> <p>TFA Representatives may be engaged in providing financial and investment-related seminars and enrollment meetings not designed to provide investment advice and not tailored to meet the needs or investment objectives of specific individuals or accounts. Included in these services are employee educational meetings focused on the importance of planning for retirement. Materials provided are intended to be educational in nature and to provide seminar participants with information regarding certain investment related topics. The information contained in the seminar materials is not intended as specific investment advice and does not purport to meet the investment objectives or needs of specific individuals or accounts.</p> <p>TFA Representatives do not act as ERISA fiduciaries when providing these services.</p>	<p>Educational services are generally provided to employees at no cost to the plan.</p>
<p>Third Party Administrative Services</p> <p>TFA Representatives may refer plan fiduciaries to third-party providers of employee benefit plan record-keeping and administrative services such as ePlan Advisors, Benefit Solutions Corporation, and American Trust Savings & Bank (collectively “third party administrators”) in exchange for a solicitation fee. TFA and its Representatives contract directly with and are paid by the third party administrator to provide these solicitation services.</p> <p>As discussed above in the section on “Third Party Money Management Services and Solicitation”, where TFA investment advisor representatives</p>	<p>The costs associated with third party administrative services are detailed in the agreement between the plan fiduciary, the plan and the relevant third party administrator. Any solicitation fees paid to TFA and its Representatives for their role in soliciting third party administrator or money management services are paid by the third-party administrator or money manager and detailed in the “Solicitation Disclosure Document” provided by the third party administrator to the plan fiduciary.</p>

<p>recommend third party money management services to plans serviced by third party administrators, they may be acting as fiduciaries under Section 3(21) of ERISA.</p>	
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