

Lifemark Securities Corp.

Investors Best Interest Disclosure

Acting In Our Customer's Best Interest

Whenever Lifemark is providing financial advice to an investor, we are acting as a financial steward in whom you have placed trust. As such, we are duty bound by law and our code of ethics to act in your best interest and avoid self-dealing. This means we place your interest ahead of ours. In addition, we disclose conflicts of interest when they occur and charge only fees that are reasonable.

Acting in your best interest means applying and adhering to a prudent process when providing advice to retail investors. Although there are numerous articulations of “procedural prudence,” there are four hallmarks common to all:

Analysis

We begin by diligently gathering information needed to gain an understanding of your needs, goals, resources, risk tolerance, and preferences.

Development of Strategy

As a competent advisor with requisite expertise, consideration is given to the information gathered from you. It is weighed against the universe of options available to us that present reasonable and prudent solutions. The decision-making process is guided by your rank of importance of the factors mentioned above. **The ultimate strategy recommended is consistent with your stated risk tolerance, total investable assets, time horizons, and expectations.**

Formalize and Implement

In this phase, the strategy translates into action where investments are acquired or repositioned. This may be accomplished by purchasing commissioned based investments, placing the investments within a fee based managed account or a combination of the two. Each has its advantages and disadvantages, which will be explained to you. **We do not have a predisposition toward each option, nor do we endeavor to incent or dissuade either choice. Instead, our recommendations are the logical outcome of the prudent process described herein and what we conclude to be in your best interest.**

Monitor

We review accounts on a periodic basis that we believe to be appropriate, but not less than annually. Our determination of that frequency considers many factors including, but not limited to, the type of assets held, the trading activity level of the account, overall market conditions and your preferences.

In addition to the periodic statements you receive from custodians and trustees of your account, your financial professional will meet with you to review your account. That review will be tailored to your situation and will include, among other things, the following:

- A review and explanation of the performance of the account during the preceding period.
- A review and explanation of the expenses incurred within the account.
- A review of your original criteria and any changes that may have occurred.
- Confirmation of the strategy being employed or discussion of recommended adjustments to the strategy.
- The frequency and method of this review meeting will be mutually agreed upon, memorialized and occur not less than annually.

In summary, acting in your best interest means that the recommendations and advice we provide are the logical result of the prudent process described above. Again, that may be a commission-based product, a fee-based account or a combination of the two. We will take as much time as needed to ensure your understanding of the recommendations we make. In addition, we will memorialize the basis of our recommendations and advice and will review that information with you during our periodic meetings.

Your understanding of, and agreement with the process described above is important. Lifemark relies on the information you provide. Be sure to discuss this and all disclosures in this document with your financial professional. If you require further information, please contact our Home Office at 800.291.7570 and ask to speak to someone in Compliance.

We Acknowledge and Disclose Conflicts of interest

Because we receive compensation that may vary with the recommendations we provide, Lifemark's interests and yours may be considered conflicted. Conflicts of interest may be unavoidable, and we are duty bound to disclose them. Should they occur, they are not of our making, and we will in good faith, disclose them in as much detail as is reasonably possible.

Conflicts generally arise when our compensation is variable. **In other words, there may be an economic incentive on our part to recommend a solution that generates greater compensation than another solution available to you and that may not be in your best interest.** Here are some hypothetical examples of conflicts of interest:

In Recommending Commission Products, such as Mutual Funds, Annuities, Closed End Funds, Unit Investment Trusts, Partnerships, Real Estate Investment Trusts (REIT's), Private Placements, etc., conflicts of interest are prevalent.

- Lifemark is compensated only if you buy what we are recommending.
- Our compensation will increase with the amount of the transaction.
- Our rate of compensation may vary within the same types of investments. For instance, a growth and income mutual fund from one fund family may pay a dealer concession of 5% where a substantially similar one from another fund family may pay a concession of 2% on the same amount of investment.
- At times, we can select the rate and schedule of commissions and compensation we receive. This may impact the total fees and expenses you are paying within the product.
- We may benefit by directing or channeling our sales to a "preferred company" by achieving sales quotas that result in eligibility for free trips, conferences and other perks.

In Recommending Fee Based Managed Accounts, our compensation is a negotiated percentage of the total assets under management (AUM) in your account. Lifemark generally utilizes third party institutional managers within a platform for the fee based managed accounts we offer. Charges and expenses vary within and between each platform. If the total fees you pay are the same regardless of the platform we recommend, our net compensation may vary. This may create an incentive for an advisor to recommend an option that yields higher net compensation.

In Dealing with Other Institutions such as third-party managers, fund families, insurance companies and other issuers, conflicts may arise. For example:

- We may receive additional compensation because of increased volume. In other words, we may have an incentive to direct or concentrate business with an institution.
- An institution we work with may be a sponsor of a Lifemark conference or meeting. In such an instance, they are paying cash to Lifemark or directly paying a specific expense.
- An institution may pay, in part or full, the cost of a Lifemark associate attending an informational meeting.
- An institution may offer to provide services to Lifemark, at no charge, for which we would otherwise pay.
- We may receive different levels of compensation if working with an intermediary such as an insurance marketing organization or insurance general agency.

In summary, we believe that conflicts of interest in financial services are unavoidable as we pursue a broad array of financial solutions for our customers. Lifemark endeavors, in good faith, to manage conflicts in several ways including, but not limited to, the following:

- We will not create an economic incentive that favors any specific product or financial solution.
- We will not create an economic incentive that favors any specific institution.
- We do not create and sell proprietary products.
- We provide our advisors with ongoing training and discussion of principles of fair dealing, stewardship, and the avoidance of potential conflicts.
- We require that any institution we work with seeks our permission and approval before offering a “soft dollar” benefit to our advisors.
- We maintain an effective system of supervision that reviews and approves every transaction of our advisors. We require a written substantiation of all recommendations to investors.

It is important that you are aware of potential conflicts of interest in the advice you receive. Most conflicts relate to how compensation is received by Lifemark and its advisors. Be sure to discuss this and all disclosures in this document with your advisor. Your questions should be answered to your satisfaction. If you require further information, please contact our Home Office at 800.291.7570 and ask to speak to someone in Compliance.

We Will Only Charge Fees That Are Reasonable

Lifemark will only charge fees and receive compensation that are deemed reasonable for the services being provided, when compared to professional standards and norms. We periodically review our fees and compare them to prevailing industry averages for substantially similar services, to ensure that they are reasonable and not excessive.

We will discuss with you the specific fees associated with a solution we recommend. We will make every effort to ensure your understanding of the fees, and we will not proceed with the transaction until you indicate your understanding of costs and value of the solution being recommended.

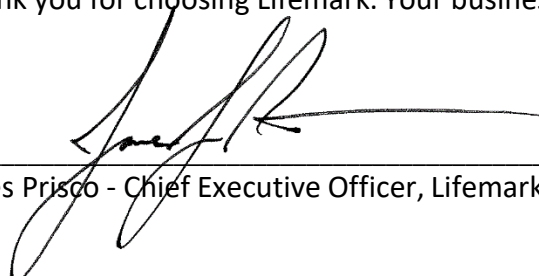
Lifemark endeavors, in good faith, to disclose and discuss the fees and expenses associated with the recommendations we have provided to you. In addition to orally explaining the fees and expenses, you have been provided with prospectuses, memorandum, copies of agreements or any other disclosure documents that accompany the recommendations we have provided.

Be sure to discuss this and all disclosures in this document with your advisor. If you require further information, please contact our Home Office at 800.291.7570 and ask to speak to someone in Compliance.

As the Chief Executive Officer of Lifemark, I am ultimately responsible for maintaining policies, procedures and training to ensure that we comply with all rules, regulations and professional standards of our industry.

I invite you to contact us should you wish to discuss any concerns or questions that you feel have not been adequately addressed.

Thank you for choosing Lifemark. Your business and trust are appreciated.



James Prisco - Chief Executive Officer, Lifemark Securities Corp.

