

Portfolio Navigator Asset Allocation Program Investment Adviser Disclosure Document

RiverSource Investments, LLC
50605 Ameriprise Financial Center
Minneapolis, MN 55474
(612) 678-1762

This brochure provides clients with information about investment advisory services offered under the Portfolio Navigator Asset Allocation Program and certain related information relevant to the program as of March 13, 2009, that should be considered before becoming a client of RiverSource Investments, LLC. This information has not been approved or verified by any governmental authority.

Portfolio Navigator Asset Allocation Program Investment Adviser Disclosure Document

This disclosure document describes investment advisory services offered under the Portfolio Navigator Asset Allocation Program (the “Program”) and provides certain related information relevant to the Program. In this disclosure document, “we,” “our,” “us” and similar words mean RiverSource Investments, LLC (“RiverSource Investments”). “You”, “your” and similar words mean a client participating in the Program.

RiverSource Investments serves as non-discretionary investment adviser for the Program solely in connection with the development of the asset allocation model portfolios and periodic updates of the model portfolios. In this role, RiverSource Investments relies upon the recommendations of a third party service provider. In developing and updating the model portfolios, RiverSource Investments reviews the recommendations, and the third party’s rationale for the recommendations, with the third party service provider. RiverSource Investments also conducts periodic due diligence and provides ongoing oversight with respect to the process utilized by the third party service provider.

RiverSource Investments is providing this disclosure document to persons who may enroll in or who have enrolled in the Program in order to ensure compliance with the Investment Advisers Act of 1940, as amended (the “Advisers Act”). This disclosure document only provides information regarding the Program and investment advisory services offered under the Program pursuant to Rule 204-3(d) under the Advisers Act. You may obtain a disclosure brochure providing a complete description of RiverSource Investments’ business and services by contacting RiverSource Investments at the address or phone number listed on the front page.

Background Information Regarding Portfolio Navigator Asset Allocation Program

The following description of the Program is based on information provided by the life insurance company affiliates of RiverSource Investments (each as applicable, “Insurer”) that serve as administrator and sponsor the Program, as described in the section below entitled RiverSource Investments’ affiliates, Insurance Companies.

The Services

The Program is available to owners of certain variable annuity contracts (each a “Variable Annuity” and collectively, “Variable Annuities”) and/or variable life insurance policies (each a “Variable Life Insurance Policy” and collectively, “Variable Life Insurance Policies”) (each a “Variable Contract” and collectively, “Variable Contracts”) issued by Insurer. You pay the Insurer who issues the Variable Contract fees and expenses when you buy, own, surrender or make a withdrawal from the Variable Contract, including the charges you pay for any optional riders you select. While you pay no fees directly to us for our services provided to you under the Program, Insurer will pay our fee out of its own assets, which may include revenues Insurer receives from the fees and expenses you will pay Insurer. For more details regarding fees, please see “Fees” below.

Under the Program, a third party service provider provides recommendations to RiverSource Investments in designing and periodically updating certain asset allocation model portfolios (each a “Model Portfolio” and collectively the “Model Portfolios”). A Model Portfolio consists of subaccounts, each of which invests in a fund with a particular investment objective (“Underlying Fund”), and may include Insurer’s fixed account (if available under the Program) and certain Guarantee Period Accounts (if available under the Program) that represent various asset classes (“Allocation Options”). A Model Portfolio also specifies allocation percentages to each of the Allocation Options that make up the Model Portfolio. To participate in the Program, you must direct Insurer to allocate your Variable Contract value to a Model Portfolio you select. Insurer will also automatically rebalance your Variable Contract value quarterly in order to maintain alignment with the allocation percentages of Allocation Options specified in the Model Portfolio. Periodically (generally annually) when the Model Portfolio is updated, Insurer will, unless you instruct Insurer not to do so, follow the written investment instruction you provided when you enrolled in the Program to reallocate your Variable Contract value according to the updated version of such Model Portfolio.

Prior to participating in the Program, you should read the description of the Program contained in the Variable Contract prospectus and review the Program information included in this disclosure document, including the terms of the Program found in the Portfolio Navigator Asset Allocation Program investment advisory agreement, carefully. Your investment professional or sales representative can provide you with additional information and can answer questions you may have on the Program.

Development and Updating of the Model Portfolios

Morningstar Associates, LLC (“Morningstar Associates”), a registered investment adviser and wholly owned subsidiary of Morningstar, Inc., currently provides recommendations regarding the development of, and updates to, the Model Portfolios to RiverSource Investments. Morningstar Associates and Morningstar, Inc. are not affiliated with RiverSource Investments or any company that is affiliated with RiverSource Investments. RiverSource Investments may replace Morningstar Associates and may hire additional firms to assist with the development and periodic updates of the Model Portfolios in the future, or it may elect to itself develop and periodically update the Model Portfolios without the assistance of a third party service provider.

Development and Periodic Updates of the Model Portfolios. Insurer identifies to Morningstar Associates the universe of Allocation Options that can be included in the Model Portfolios (the “Universe of Allocation Options”). Neither RiverSource Investments nor any of its affiliates, including Insurer, may dictate to Morningstar Associates the number of Allocation Options (within the Universe of Allocation Options) that should be included in a Model Portfolio, the percentage that any Allocation Option represents in a Model Portfolio, or whether a particular Allocation Option may be included in a Model Portfolio. However, as described below under “Conflicts of Interest,” there are certain conflicts of interest associated with RiverSource Investments’ and its affiliates’ influence over the development and updating of the Model Portfolios.

The Universe of Allocation Options identified by Insurer to Morningstar Associates may not include all Allocation Options available under your Variable Contract. The Universe of Allocation Options identified by Insurer to Morningstar Associates generally includes only those Allocation Options available in Insurer’s currently offered insurance and annuity product line. The Universe of Allocation Options will be modified from time to time by Insurer. These modifications may reflect instructions from, or respond to actions taken by, any party making an Allocation Option available to Insurer. For example, Insurer may modify the Universe of Allocation Options in response to the liquidation, merger or other closure of an Underlying Fund.

In developing a Model Portfolio, Morningstar Associates evaluates the Universe of Allocation Options identified by Insurer and recommends the Allocation Options for each asset class in the Model Portfolio to RiverSource Investments based on criteria determined by Morningstar Associates. Morningstar Associates may select different Allocation Options to represent the same asset class in different Model Portfolios. Similarly, Morningstar Associates may vary the weighting of an Allocation Option within the same asset class in different Model Portfolios. In considering the Universe of Allocation Options, Morningstar Associates may consider the impact that a large inflow or outflow may have on an Underlying Fund, which may impact its decisions in developing and updating the Model Portfolios. Periodically, Morningstar Associates will evaluate each Model Portfolio and make recommendations to RiverSource Investments regarding updates. As a result, the Model Portfolios are expected to be updated from time to time (typically annually) with new Allocation Options, allocation percentages and/or asset classes. Additionally, Model Portfolios also may be evaluated, and recommendations may be made, to reflect a modification to the Universe of Allocation Options, such as where an Underlying Fund of an Allocation Option is expected to be liquidated, merged into another fund or otherwise closed, or to reflect other developments such as a change in the investment objective of an Underlying Fund. Insurer, acting as a Program administrator, will notify clients of updated Model Portfolios (typically annually).

Beginning with the 2009 annual update, RiverSource Investments and Insurer requested that Morningstar Associates apply certain volatility constraints to the updated Model Portfolios. These constraints are an attempt to produce overall Model Portfolio returns that fall within a particular range of composite index performance. Morningstar agreed to apply these volatility constraints to future Model Portfolio updates because it determined that doing so would not jeopardize its asset allocation methodology. RiverSource Investments and Insurer believe that these volatility constraints make the Program more marketable while also helping to mitigate certain risks associated with Insurer’s hedging program.

The Model Portfolios. In connection with each of the various Insurer product offerings using the Program, there are currently five Model Portfolios ranging from conservative to aggressive, each comprised of a combination of Allocation Options in certain allocation percentages. You should review the description of the Model Portfolios carefully before selecting or changing a Model Portfolio. Clients who purchase contracts with the Accumulation Protector Benefit rider will not be able to select the Aggressive Model Portfolio as the model portfolio for their investment or transfer to the Aggressive Model Portfolio while the rider is in effect. As a result, these clients will have only four Model Portfolios available to them, ranging from conservative to moderately aggressive. Your investment professional or sales representative can provide you with additional information and can answer questions you may have on the Model Portfolios.

Client Eligibility

The Program is available to clients owning Variable Contracts. Certain optional Living Benefit Riders available under the Variable Annuities require a client to participate in the Program. If the Variable Annuity does not include a Living Benefit Rider that requires a client to participate in the Program or if a client owns a Variable Life Insurance Policy, a client may also elect to participate in the Program. Under certain Variable Annuities, there is an additional charge if a client elects to participate in the Program.

Required Participation — Optional Living Benefit Rider. A client who owns a Variable Annuity that includes certain optional Living Benefit Riders is required by the terms of the Living Benefit Rider to participate in the Program. If the Program is used with one of these optional Living Benefit Riders, the client pays Insurer a charge specified in the Variable Annuity for the particular Living Benefit Rider, but does not pay a separate charge to Insurer or RiverSource Investments to participate in the Program.

Optional Participation. Owners of Variable Annuities which do not include a Living Benefit Rider and owners of Variable Life Insurance Policies may participate in the Program. Under certain Variable Annuities, a client who elects to participate in the Program must purchase the Portfolio Navigator Rider and will pay Insurer a charge as specified in the Variable Annuity for the Portfolio Navigator Rider in order to participate in the Program. For additional information about the Living Benefit Riders and the Portfolio Navigator Rider, see the Variable Annuity prospectus.

Client's Participation in the Program

Selection of a Model Portfolio. If you choose or are required to participate in the Program, you are responsible for determining which Model Portfolio is best for you. Your investment professional or sales representative can help you make this determination and may provide you with a questionnaire to complete (the "Investor Questionnaire"). Insurer, in its role as administrator and sponsor of the Program, makes the Investor Questionnaire available to investment professionals and sales representatives distributing Variable Contracts associated with the Program. Although you are not required to complete the Investor Questionnaire, the Investor Questionnaire is a tool that can help you define your investing style which is based on factors such as your investment goals, your tolerance for risk and how long you intend to invest. Also, your responses to the Investor Questionnaire help you determine which Model Portfolio most closely matches your investing style. Model Portfolio suggestions made by your investment professional or sales representative may be based in part on your responses to the Investor Questionnaire. The Investor Questionnaire is only a guide to help you determine the Model Portfolio best suited to your risk tolerance and investment needs. While the scoring of the Investor Questionnaire is objective, there is no guarantee that your responses to the Investor Questionnaire accurately reflect your tolerance for risk. Similarly, there is no guarantee that the asset mix reflected in the Model Portfolio you select after completing the Investor Questionnaire is appropriate to your ability to withstand investment risk. If you have questions or require additional information, it is important to work with your investment professional or sales representative before making decisions regarding a Model Portfolio. Neither Insurer nor RiverSource Investments is responsible for your decision to participate in the Program, your selection of a specific Model Portfolio or your decision to change to an updated or different Model Portfolio.

In connection with each of the various Insurer product offerings using the Program, there are currently five Model Portfolios ranging from conservative to aggressive. Under certain Living Benefit Riders, Insurer reserves the right to limit the number of Model Portfolios from which you can select. Clients who purchase contracts with the Accumulation Protector Benefit rider will not be able to select the Aggressive Model Portfolio as the model portfolio for their investment or transfer to the Aggressive Model Portfolio while the rider is in effect. As a result, these clients will have only four Model Portfolios available to them, ranging from Conservative to Moderately Aggressive. You may not use more than one Model Portfolio at a time for each Variable Contract you own.

Allocation and Automatic Rebalancing of Client's Variable Contract Value. Each Model Portfolio specifies allocation percentages to the Allocation Options that make up that Model Portfolio. When you participate in the Program and select a Model Portfolio, you direct Insurer to invest your Variable Contract value in the Allocation Options making up the selected Model Portfolio according to the allocation percentages stated for such Model Portfolio. Also by participating in the Program, you provide standing instructions to Insurer to automatically rebalance your Variable Contract value quarterly in order to maintain alignment with these allocation percentages. Please see the Variable Annuity prospectus for special rebalancing rules regarding any Guarantee Period Accounts included in a Model Portfolio and dollar-cost averaging (DCA) arrangements in connection with any DCA account and your Variable Life Insurance Policy prospectus for special rebalancing rules regarding fixed account allocations and dollar-cost averaging arrangements.

Updating of Model Portfolio and Reallocation of Client's Variable Contract Value. As described above, Model Portfolios will be periodically updated (typically annually). At each time your Model Portfolio is updated, Insurer, acting as a Program administrator, will send to you a reassessment letter to notify you of the update. This reassessment letter will inform you that the Model Portfolio has been reassessed and that, unless you instruct Insurer not to do so, your Variable Contract value, less amounts under Variable Annuities allocated to the DCA account, and amounts under Variable Life Insurance Policies allocated to the fixed account (collectively, "Excluded Amounts"), is scheduled to be reallocated according to the updated Model Portfolio. The reassessment letter will specify the scheduled reallocation date and will be sent to you at least 30 days prior to this date. If you do not notify Insurer otherwise, you will be deemed to have instructed Insurer to reallocate your Variable Contract value, less any Excluded Amounts, according to the updated Model Portfolio based on the written investment instruction you provided when you enrolled in the Program. If you do not want your Variable Contract value, less any Excluded Amounts, to be reallocated according to the updated Model Portfolio, you must provide Insurer with written or other authorized notification as specified in the reassessment letter.

For Variable Annuities, in addition to this periodic reassessment and reallocation described above, at any time up to twice per contract year, you may reallocate your Variable Annuity value, less amounts allocated to any Special Dollar-Cost Averaging Account or Dollar-Cost Averaging Fixed Account (each, a "DCA account"), according to the most updated version of your existing Model Portfolio or to a different Model Portfolio by written request on an authorized form or by another method agreed to by Insurer. However, if your Variable Annuity includes a Living Benefit Rider that requires you to participate in the Program and you make such reallocation (other than a scheduled periodic reallocation), Insurer may charge you a higher fee for your Living Benefit Rider. See the Variable Annuity prospectus or your Living Benefit Rider for details.

For Variable Life Insurance Policies, in addition to the periodic reassessment and reallocation described above, at any time up to twice per policy year, you may reallocate your Variable Life Insurance Policy value, less amounts allocated to the fixed account, according to the most updated version of your existing Model Portfolio or to a different Model Portfolio by written request on an authorized form or by another method agreed to by the Insurer.

You are responsible for determining whether or not to reallocate your Variable Contract value less any Excluded Amounts allocated to the DCA account. RiverSource Investments has no discretionary authority or control over this reallocation.

Role of RiverSource Investments

Limited Investment Advisory Roles of RiverSource Investments. Our investment advisory role is strictly limited to the development and periodic updates of the Model Portfolios described in this disclosure document. Neither RiverSource Investments nor Morningstar Associates, in connection with their respective roles, provides any individualized investment advice to you regarding the application of a particular Model Portfolio to your particular circumstances. You are solely responsible for determining whether participating in the Program, selecting any Model Portfolio, or changing to an updated or different Model Portfolio, is suitable and appropriate. We will not act as custodian for the Program and will not take possession of any assets. We are also not responsible for execution services, provision of reports, or any other matter relating to the Program account(s).

Delegation of RiverSource Investments' Roles. We may delegate any or all of our rights, duties and obligations under our investment advisory agreement with you to one or more affiliated subadvisers from time to time.

Conflicts of Interest

Conflicts in Connection with RiverSource Investments' and Its Affiliates' Influence over Development and Updates of the Model Portfolios. Certain Allocation Options in the Model Portfolios may be managed or advised by us or our affiliates. We or our affiliates may receive higher compensation as a result of your investment in these Allocation Options. In addition, the Model Portfolios with higher percentages allocated to these Allocation Options will generally result in greater overall compensation to us or our affiliates. Also, the inclusion of an Allocation Option managed by us or our affiliates in the Model Portfolios and the designation of higher allocation percentages to that Allocation Option may benefit Insurer and our other affiliates which provide services to that Allocation Option or its Underlying Funds. Moreover, certain other fund families that are not affiliated with, or managed or advised by, us and that sponsor Underlying Funds may pay compensation to us, Insurer or our other affiliates. The relationships described herein may influence our decisions, and Insurer's identification of the Universe of Allocation Options for Morningstar Associates' consideration, in connection with the development and updating of the Model Portfolios.

RiverSource Investments serves as investment adviser to the RiverSource Variable Series Trust which includes RiverSource Variable Portfolio funds, RiverSource Partners Variable Portfolio funds, Seligman Variable Portfolio funds, Threadneedle

Variable Portfolio funds and Disciplined Asset Allocation Portfolios funds. We may receive higher compensation as a result of your investment in, and as a result of higher percentages allocated to, Allocation Options investing in these funds. Insurer, as our affiliate, may have an incentive to identify Allocation Options investing in the RiverSource Variable Series Trust for Morningstar Associates' consideration.

In addition, RiverSource Investments, in its capacity as investment adviser to the RiverSource Variable Series Trust, monitors the performance of the RiverSource Variable Series Trust. In this role, RiverSource Investments may, from time to time, recommend to the board of directors of a RiverSource Variable Series Trust fund a change in portfolio management or fund strategy or the closure or merger of a RiverSource Variable Series Trust fund. In addition, we may believe that certain RiverSource Variable Series Trust funds may benefit from additional assets or could be harmed by redemptions. All of these factors may also influence our decisions, and Insurer's identification of the Universe of Allocation Options for Morningstar Associates' consideration, in connection with the development and updating of the Model Portfolios.

Insurer's identification of the Universe of Allocation Options for Morningstar Associates' consideration, and our role in connection with the development and updating of the Model Portfolios, may influence the allocation of assets to or away from Allocation Options and Underlying Funds that are the RiverSource Variable Series Trust funds, which are affiliated with, or managed or advised by, us. In addition, input provided to Morningstar Associates by RiverSource Investments or Insurer in connection with overall Program structure may provide certain direct or indirect benefits to us and/or our affiliates. For example, our request that Morningstar use certain volatility constraints in constructing and updating Model Portfolios helps mitigate certain risks associated with Insurer's hedging program.

Some of our officers and employees are also officers or employees of Insurer or our other affiliates which may be involved in, and/or benefit from, your participation in the Program. For example, officers and employees of RiverSource Investments may also be officers and employees of Insurer, the administrator and sponsor of the Program and the issuer of the Variable Contracts; RiverSource Fund Distributors, the principal underwriter and distributor of the RiverSource complex of mutual funds and the Seligman Variable Portfolio Funds; RiverSource Distributors, Inc. ("RiverSource Distributors"), currently the principal underwriter of most of the RiverSource Variable Series Trust funds; and the RiverSource Variable Series Trust funds themselves. These officers and employees may have an incentive to make recommendations, or take actions, that benefit one or more of the entities they represent, rather than participants in the Program.

RiverSource Investments' Other Business Arrangements with Morningstar Associates. RiverSource Investments and our affiliates' other business arrangements with Morningstar Associates may influence our decision to retain Morningstar Associates to provide recommendations regarding the development of, and updates to, the Model Portfolios.

Risks

Model Portfolio Criteria. The process of developing and periodically updating Model Portfolios is subject to inherent limitations. Morningstar Associates applies certain criteria in making recommendations related to the structure and updating of the Model Portfolios. Similarly, Insurer applies certain criteria in identifying the Universe of Allocation Options that can be included in the Model Portfolios. These criteria may be different than the criteria that we might otherwise establish and apply on our own. ***The criteria used in developing and updating Model Portfolios do not guarantee or predict future performance.*** You are responsible for determining whether and to what extent a Model Portfolio is appropriate for you and whether a change to an updated or different Model Portfolio is appropriate for you.

No Guarantee of Performance. ***Asset allocation through the Program does not guarantee that your Variable Contract will increase in value nor will it protect against a decline in value if market prices fall.*** All investments involve risk (the amount of which may vary significantly), investment performance can never be predicted or guaranteed, even when employing very conservative strategies such as those employed by money market mutual funds or other accounts that seek preservation of capital. The market value of the assets invested through the Program will fluctuate due to market conditions and other factors, such as liquidity and volatility. All trading of your Variable Contract value is at your risk, which risk may vary depending upon the Model Portfolio you select.

Performance Risk Associated with Quarterly Rebalancing and Periodic Updating. Quarterly rebalancing and periodic updating of the Model Portfolios can cause the funds in which the Allocation Options of the Model Portfolios invest to incur transactional expenses to raise cash for money flowing out of the funds or to buy securities with money flowing into the funds and may cause the funds to sell securities at less favorable prices than would be the case if the fund's manager was not

forced to raise cash in the portfolio. These price differences could be significant during periods of market stress, where disorderly market conditions may make it difficult or impossible to sell investments at certain prices or at all.

Moreover, large outflows of money from the funds may increase the expenses attributable to the assets remaining in the funds. These factors can adversely affect the performance of the relevant funds and the Model Portfolios. In addition, when a particular fund needs to buy or sell securities due to quarterly rebalancing or periodic updating of a Model Portfolio, it may hold a large cash position. A large cash position (generated by selling securities or large inflows) could detract from the achievement of the fund's investment objective in a period of rising market prices; conversely, a large cash position would reduce the fund's magnitude of loss in the event of falling market prices and provide the fund with liquidity to make additional investments or to meet redemptions. (See also "Conflict of Interests" above). For additional information regarding the risks of investing in a particular fund, see that fund's prospectus.

Quarterly rebalancing occurs throughout the quarter and a client's specific quarterly rebalance schedule is a function of their contract anniversary date. Insurer may also choose to implement Model Portfolio updates on different dates for different sets of clients in order to facilitate operational efficiency. Timing differences between a client's rebalance or update implement dates and the dates applied to other clients in the Program will result in performance dispersions between accounts. However, Insurer believes that over time the timing methodologies used do not unfairly disadvantage one client or set of clients versus another.

Services for Other Clients. RiverSource Investments and its affiliates perform services for clients other than those participating in the Program, including advisory services. RiverSource Investments and its affiliates also may advise and take action in the performance of duties to other clients (including those who may be participants in the Program) that may differ from information given, or the timing and nature of action taken, with respect to the Model Portfolios. RiverSource Investments and its affiliates may trade and have positions in certain Allocation Options or their Underlying Funds which may or may not be recommended in connection with updates to Model Portfolios. Nothing in the investment advisory agreement between RiverSource Investments and you shall be deemed to impose upon RiverSource Investments and its affiliates any obligation to recommend for purchase or sale in any Model Portfolio, any security or any other property that RiverSource Investments and its affiliates may purchase, sell or hold for its own account or the account of any other client. By reason of their various activities, RiverSource Investments and its affiliates may from time to time acquire information about various corporations and their securities. RiverSource Investments and its affiliates may not always be free to divulge such information, or to act upon it.

Market Conditions and Related Constraints. Disorderly market conditions or periods of market stress may make it difficult or impossible to pursue an investment strategy or objective. During these periods, it may be difficult or impossible to buy or sell investments at certain prices or at all. Moreover, volatility or events associated with markets, sectors or issuers may make it difficult to implement certain policies and procedures designed to ensure equal treatment among client accounts. Unfavorable market conditions and budget constraints may also impact our ability to retain or attract talented employees or allocate resources as we otherwise would during periods of economic stability. While we may make resource allocations designed to streamline or bring more efficiency to our operations during periods of economic stress, we will not compromise our fiduciary standards or compliance with our policies and procedures that are reasonably designed to prevent violations.

Fees

Program Fees. Insurer will pay us a fee associated with our allocated cost in providing the services under the Program. Among other costs, this fee covers the fee we pay to Morningstar Associates for providing recommendations to us regarding the development of, and updates to, the Model Portfolios. Insurer will pay our fee out of its own assets, which may include revenues Insurer receives from the fees and expenses you will pay Insurer when you buy, own and surrender or make a withdrawal from a Variable Contract, including the charges you pay Insurer for any optional riders you select.

You will pay no fees directly to us for our services provided to you under the Program. However, as described above, you may indirectly pay our fee as a result of the fees and expenses you will pay Insurer. For further information about fees and expenses associated with the Portfolio Navigator Program and living benefit riders, see the Variable Contract prospectus or your Living Benefit Rider for more details.

Additional Fees. Other products, services and features may be included in or made available in connection with the Program or through Insurer from time to time, and these additional products, services and features will typically have their own fees

and expenses, terms, conditions and disclosure documents. We and our affiliates may receive fees in connection with, or otherwise have a financial interest in, such products, services and features.

Termination and Amendment of the Program

Insurer reserves the right to change the terms and conditions of the Program upon written notice to you. This includes the right to offer more or fewer Model Portfolios, to vary the Allocation Options and/or allocation percentages within those Model Portfolios, and to change the periodic reallocation process. If permitted under applicable securities law, Insurer reserves the right to substitute a fund of funds for your current Model Portfolio. Insurer also reserves the right to discontinue the Program. Insurer will give you thirty (30) days' prior written notice of any such change.

Termination of the Investment Advisory Agreement

Either we or you may elect to terminate our investment advisory agreement with you at any time without cause by providing written notice of such termination to the other party. If we decide to terminate the agreement, you will be given thirty (30) days' written notice. This Agreement will terminate automatically in the event that Insurer is notified of a death which results in a death benefit becoming payable under the Variable Contract associated with Client's participation in the Program. In this case, your investment advisory relationship with RiverSource Investments and the notification of future reassessments will cease, but prior instructions provided by you in connection with your participation in the Program will continue (e.g., rebalancing instructions provided to Insurer).

Termination of the investment advisory agreement between you and us does not automatically terminate any Living Benefit Rider or any Portfolio Navigator Rider. Rather, a Living Benefit Rider or a Portfolio Navigator Rider may be terminated only upon the terms and conditions stated in the specific rider attached to your Variable Annuity. However, if your Variable Contract includes a Living Benefit Rider that requires you to participate in the Program, your termination of the agreement may require you to surrender or make a full withdrawal of the Variable Annuity and, depending on when this occurs, you may have to pay Insurer a surrender charge under the terms of the Variable Annuity upon surrender or withdrawal of the Variable Annuity.

If we terminate our investment advisory agreement with you and other participants in the Program, Insurer would either have to find a replacement investment adviser or terminate the Program unless otherwise permitted by applicable law, regulations or positions of the Staff of the Securities and Exchange Commission.

RiverSource Investments' Other Business Activities

RiverSource Investments offers professional money management services concerning the investment of assets, on either a discretionary or non-discretionary basis, and related services including trading, cash management and reporting to institutional and high-net-worth clients. RiverSource Investments may also provide asset-liability management, investment accounting and credit-analysis services to institutional clients, as well as non-discretionary asset-allocation services to retail clients. RiverSource Investments also provides investment management services to certain subsidiaries of Ameriprise Financial, Inc. ("Ameriprise Financial"). While the principal business of RiverSource Investments is investment advisory services, RiverSource Investments also provides client services and financial product development and support. RiverSource Investments may also provide its investment advisory clients with investment accounting and other administrative services pursuant to a sub-delegation arrangement with its parent company, Ameriprise Financial. RiverSource Investments is part of the Ameriprise group of companies which includes Ameriprise Financial and its affiliated companies (collectively, "Ameriprise Group"). Ameriprise Group makes available a diverse array of financial products and services, and RiverSource Investments may be deemed the "sponsor" of some of these products or services.

On November 7, 2008, RiverSource Investments completed its acquisition of J. & W. Seligman & Co. Incorporated ("Seligman"). With the completion of the acquisition, substantially all of Seligman's investment advisory contracts were transferred to RiverSource Investments and the companies are in the process of integrating their investment operations and related compliance programs. Additionally, Seligman Investments is now an offering brand of RiverSource Investments.

RiverSource Investments' Other Financial Industry Activities or Affiliations

Ameriprise Financial owns 100% of the voting interests of RiverSource Investments. As part of the Ameriprise Financial organization, RiverSource Investments receives general corporate services, including administrative support, equipment and facilities. Eligible RiverSource Investments employees also receive certain employee benefits from Ameriprise Financial. The following affiliates of RiverSource Investments have, as applicable, certain investment management, brokerage, administration and other business arrangements relevant to the Program:

Broker-Dealers

RiverSource Distributors, an SEC-registered broker-dealer subsidiary of Ameriprise Financial, Inc., currently serves as distributor and principal underwriter to most of the RiverSource Variable Series Trust funds. It is anticipated that RiverSource Funds Distributors, Inc., an SEC-registered broker-dealer formerly known as Seligman Advisors, Inc., will assume this role from RiverSource Distributors sometime in 2009. RiverSource Distributors also distributes variable annuity and variable life insurance products issued by RiverSource Life Insurance Company (“RiverSource Life”) and RiverSource Life Insurance Co. of New York (“RiverSource Life of NY”) through other broker-dealers, including Ameriprise Financial Services, Inc. (“Ameriprise Financial Services”). RiverSource Distributors and RiverSource Fund Distributors serve as the principal underwriters and distributors of the RiverSource complex of mutual funds which includes funds branded “RiverSource,” “RiverSource Partners,” “Threadneedle,” and “Seligman”. RiverSource Investments pays from its own resources or arranges for the payment of financial support to RiverSource Distributors and RiverSource Fund Distributors to help promote and support the distribution of these fund entities. RiverSource Investments, RiverSource Life and RiverSource Life of NY have sales personnel who are registered representatives of RiverSource Distributors and/or RiverSource Fund Distributors.

RiverSource Investments is also affiliated with Ameriprise Financial Services, an SEC-registered broker-dealer and investment adviser that is a wholly-owned subsidiary of Ameriprise Financial as well as Securities America, Inc., a registered broker-dealer. Additionally, it is affiliated with Ameriprise Advisor Services, Inc. a dually registered broker-dealer and investment adviser, which is wholly-owned by AMPH Holding Corporation and Brecek and Young Advisors, Inc., a dually registered SEC broker-dealer and investment adviser, which is wholly-owned by Securities America Financial Corporation. These broker-dealers and other third party broker dealers distribute the RiverSource mutual funds.

Investment Companies

RiverSource Investments is also affiliated with certain mutual funds which are managed by RiverSource Investments or its affiliates. Ameriprise Financial provides administrative and accounting services, and RiverSource Investments provides investment advice and management, for these mutual funds. Ameriprise Financial and RiverSource Investments receive asset-based fees from each of these mutual funds.

Investment Advisers

RiverSource Investments owns a 48% equity interest in, and serves as Managing Member of, Kenwood Capital Management LLC (“Kenwood”), a small cap investment management firm that is an investment adviser registered with the Securities and Exchange Commission (the “SEC”). Kenwood receives administrative support from RiverSource Investments and its affiliates for various functions including trading, settlement, operations, account administration and compliance.

Our parent company, Ameriprise Financial, also owns Threadneedle Asset Management Holdings SARM, which in turn owns TAM UK Holdings Ltd, which in turn owns Threadneedle Asset Management Holdings Limited, the parent of Threadneedle Asset Management Limited (“TAML”), an FSA-registered adviser, and Threadneedle International Limited (“TINTL”), an FSA- and SEC-registered adviser. We have an agreement with TINTL under which TINTL provides discretionary investment management services to some of our clients in a sub-advisory capacity, including certain mutual funds advised by us.

RiverSource Investments is also affiliated with Ameriprise Financial Services, an SEC-registered investment adviser and broker-dealer that offers financial planning services, provides retail investment advisory services and engages in the broker-dealer activities described above.

As a result of the Seligman acquisition, Seligman became a wholly-owned subsidiary of RiverSource Investments. It is anticipated that Seligman’s investment adviser registration will be withdrawn during 2009 and the entity will subsequently be dissolved.

Insurance Companies

RiverSource Life and its subsidiary RiverSource Life of NY are the insurance company affiliates of RiverSource Investments that serve as administrators and sponsors of the Program. These life insurance companies, which are referred to throughout this brochure as “Insurer”, as applicable, issue certain Variable Contracts with which the Program may be used.

Through Ameriprise Financial, RiverSource Investments is affiliated with RiverSource Life, a licensed insurance company in 49 states, as well as the District of Columbia and American Samoa and RiverSource Life of NY, licensed to do business as an insurance company in New York. The products of our insurance company affiliates include fixed life insurance, variable life insurance, and disability insurance and fixed and variable annuities. Additionally, the RiverSource Variable Series Trust funds we manage are investment options offered within those variable annuity and variable life insurance products.

Education and Business Standards

RiverSource Investments has minimum standards for employees responsible for providing investment advice. The minimum educational requirement for such individuals is, generally, a college degree with the successful completion of a professional designation, such as Chartered Financial Analyst (“CFA”). An advanced degree is also desirable. RiverSource Investments may make exceptions, in its discretion, in light of appropriate work experience.

Education and Business Background of Certain Personnel

The following is the education and business background of RiverSource Investments’ principal executive officers and directors. Principal executive officers may also be officers or directors of Ameriprise Financial or its other subsidiaries.

Principal Executive Officers and Directors

William F. “Ted” Truscott (born in 1960) President, Chairman of the Board and Chief Investment Officer (“CIO”). Mr. Truscott is also President – U.S. Asset Management, Annuities and Chief Investment Officer of Ameriprise Financial, Chairman of the Board and Chief Executive Officer of RiverSource Distributors, RiverSource Fund Distributors and RiverSource Services, and Director, President and Chief Executive Officer of the Ameriprise Certificate Company. Mr. Truscott has also served as a Director of the RiverSource Funds since 2001. Mr. Truscott joined the Ameriprise Financial organization in 2001. Prior to that, Mr. Truscott had served as Chief Investment Officer with Zurich Scudder Investments, Americas, from October 2000 through August 2001 and Managing Director of Zurich Scudder Investments from January 1996 through October 2000. He received a B.A. in East Asian Studies from Middlebury College and an M.B.A. from New York University.

Michelle Keeley (born in 1964) Director, Executive Vice President – Equities and Fixed Income. She is also Executive Vice President – Equities and Fixed Income of Ameriprise Financial. Ms. Keeley joined the Ameriprise Financial organization in 2002. Previously, Ms. Keeley served as a Managing Director of Zurich Global Assets (2001-2002); and Director of Fixed Income Trading, Zurich Scudder Investments (2000-2001). She received a B.A. from James Madison College at Michigan State University and a Masters of Management in Finance from Northwestern University.

Peter A. Gallus (born in 1946) Senior Vice President and Chief Operating Officer. He is also currently Vice President-Investment Administration for Ameriprise Financial and Vice President –CAO Investment Management for Ameriprise Financial Services. Mr. Gallus has held numerous securities operational management positions since joining the Ameriprise Financial organization in 1970. He earned a B.S. in Accounting from St. Cloud State University. Mr. Gallus will be retiring from the Ameriprise Financial organization in June 2009, at which point Amy Johnson will be appointed as Chief Operating Officer of RiverSource Investments, LLC.

Amy K. Johnson (born in 1965) Vice President – Asset Management and Trust Company Services. Ms. Johnson joined RiverSource Investments in 2001 as Director – Product Development and Research. In 2004 she assumed the role of Vice President – Operations and Compliance focused on asset management products, and moved to her current position in November 2006. She earned a B.S. and M.A. in Accounting at the University of Iowa and is also a Certified Public Accountant.

Christopher P. Keating (born in 1957) Director, Vice President and Head of Institutional Sales, Client Service and Consultant Relationships. He joined the Ameriprise Financial organization in 2005. Prior to joining he was Executive Vice President: Sales, Client Service and Consultant Relationships at Fidelity Management Trust Company from 2002 to 2005, and Managing Director, Sales/Consultant Relations at Deutsche Asset Management from 2000-2002. He holds a B.S. in Business Administration from the University of Maine and a J.D. from Suffolk University Law School.

Brian J. McGrane (born in 1971) Director, Vice President and Chief Financial Officer. He is also currently Senior Vice President and Lead Financial Officer for Ameriprise Financial. Since joining the Ameriprise Financial organization in 1999, Mr. McGrane has also served as VP/LFO - Institutional and Brokerage (1/02-10/03), VP/LFO - US Brokerage (1/01-1/02) and Director - Financial

Standards and Accounting Policy (6/99-1/01). He earned a B.A. in Accounting from St. John's University, Collegeville, MN and is also a CPA.

Scott R. Plummer (born in 1959) Chief Legal Officer. He is also Vice President and Chief Counsel, Asset Management for Ameriprise Financial and Vice President, General Counsel and Secretary of the RiverSource Funds. Mr. Plummer joined the Ameriprise Financial organization in 2004 as Vice President- Asset Management Compliance. He assumed his current position in June of 2005. Prior to joining the Ameriprise Financial organization, he was Senior Vice President and Chief Compliance Officer of U.S. Bancorp Asset Management and the Private Client, Trust and Asset Management Division of US Bancorp from 2002 to 2004 and Assistant Vice President and Assistant General Counsel of Hartford Life from 2001 to 2002. He earned a B.A. from the University of Wisconsin-Madison and a J.D. from William Mitchell College of Law.

Patrick T. Bannigan (born in 1965) Director, Senior Vice President-Asset Management, Products and Marketing. Mr. Bannigan is also President of the RiverSource Funds. Prior to joining the Ameriprise Financial organization in 2006, he was Managing Director and Global Head of Product at Morgan Stanley Investment Management from 2004 to 2006. Prior to that he served as President of Touchstone Investments from 2002 to 2004 and was Director of Strategic Planning at Evergreen Investments from 1995 to 2002. He holds a B.S. from Guilford College and a J.D. from Oklahoma City University.

Eleanor T. M. Hoagland (born in 1951) Chief Compliance Officer. Ms. Hoagland is also U.S. Asset Management Chief Compliance Officer for Ameriprise Financial and Chief Compliance Officer for the RiverSource Funds, Ameriprise Certificate Company, Ameriprise Trust Company, RiverSource Service Corporation and Kenwood Capital Management LLC. Prior to joining the Ameriprise Financial organization in 2008, she was a Managing Director at J. & W. Seligman & Co. Incorporated where she held various risk management responsibilities related to oversight of derivatives, hedge fund and credit exposures, risk management and brokerage allocation. She also served as the Chief Compliance Officer for the Seligman Group of Investment Companies since 2000. She holds a B.A. in Economics from Wellesley College.

The Investment Committee

The Investment Committee which reviews the recommendations made by Morningstar Associates consists of the four members shown below.

Voting Members

Kent M. Bergene (born in 1958) Vice President - Product Planning and Strategy. Mr. Bergene joined the Ameriprise Financial organization in 1981. Mr. Bergene received a B.S. in Mathematics from the University of North Dakota.

Joseph P. Schiefelbein (born in 1968) Director of Research, Mutual Fund Product Development. Mr. Schiefelbein joined the Ameriprise Financial organization in 1990. Mr. Schiefelbein received a B.A. in Finance with an emphasis in Economics from Iowa State University.

Non-Voting Members

Lynn Murphy Abbott (born in 1967) Vice President Annuity Products. Ms. Abbott joined the Ameriprise Financial organization in 1996. She received a B.S. in Political Science and History from the University of Wisconsin - Madison.

Bryce A. Daily (born in 1965) Director Annuity Products. Mr. Daily joined the Ameriprise Financial organization in 1990. He received a B.S. in Economics from the University of Minnesota.

In addition to serving on the Investment Committee in their capacity as employees of RiverSource Investments, the non-voting members of the Investment Committee are employees of Ameriprise Financial, and their primary duties relate to RiverSource Life and its life insurance affiliate.

Code of Ethics

RiverSource Investments and certain of its affiliates have adopted the "Investment Adviser Code of Ethics" ("Code") designed to state standards of business conduct and to mitigate conflicts of interest for all "Access Persons" of RiverSource Investments when they engage in personal securities transactions. RiverSource Investments and certain of its affiliates have adopted different versions of the Code for Investment Access Persons and for other Access Persons. Investment Access Persons are Access Persons who have access to our institutional client information, such as information about impending purchases or sales of portfolio securities for institutional clients' accounts.

Under the Code, Investment Access Persons must pre-clear certain investments, are restricted with respect to the timing of certain transactions and are prohibited from making certain transactions. The Code also contains a 60-day short swing profit prohibition applicable to all investment personnel (e.g., research analysts, traders and portfolio managers) and a seven-day trading black-out period before and after client transactions applicable to all portfolio managers, and, in some cases, to research analysts. These prohibitions are subject to limited exceptions. Access Persons who are not Investment Access Persons also are prohibited from making certain transactions.

The Code contains specific provisions relating to mutual fund shares, including: a prohibition on direct or indirect market timing and, for Investment Access Persons, a 30-day holding period for Covered Mutual Fund shares subject to limited exceptions. Covered Mutual Funds are those funds for which RiverSource Investments or an affiliate serves either as an investment adviser or a principal underwriter. Investment Access Persons may place small trades of \$10,000 or less in S&P 500 securities, or ten option contracts in S&P 500 securities, without seeking pre-clearance pursuant to a de minimis rule. Individuals relying on the de minimis rule may only place one “small trade” in the same security in a 7 day period. Additionally, under the Code, portfolio managers must pre-clear proprietary mutual fund transactions in funds for which they or their team manage any part of the portfolio. We will provide a copy of our Investment Adviser Code of Ethics to any client or prospective client upon request. Clients may obtain a copy by writing to us at the address, or calling the phone number, set forth below.

Address: RiverSource Investments, LLC
 Attn: Manager of Global Administration
 50189 Ameriprise Financial Center
 Minneapolis, MN 55474
Telephone: (612) 671-3490

Insider Trading Policy

RiverSource Investments and its related persons may, from time to time, come into possession of material, nonpublic information which, if disclosed, might affect an investor’s decision to buy, sell or hold a security. Under applicable law, RiverSource Investments and its related persons are prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other person, regardless of whether such other person is a client. Accordingly, should such persons come into possession of material nonpublic information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, their respective clients, and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, their clients when following policies and procedures designed to comply with law.

RiverSource Investments and its affiliates have adopted an “Insider Trading Policy” in accordance with Section 204A of the Advisers Act which establishes procedures to prevent the misuse of material nonpublic information by RiverSource Investments and its associated persons. Moreover, the Code requires all employees of RiverSource Investments and its affiliated advisers to conduct all personal trades through one of three designated broker-dealers unless an exception has been granted, and report any changes in their selected broker-dealer. Further, all Access Persons of RiverSource Investments must make arrangements with their broker-dealers to send monthly statements to the Compliance Department, complete an annual certification form about their personal securities activities, and provide additional information about personal trading activities as may be required under the Insider Trading Policy and the Code.

Persons who violate the Code, the Insider Trading Policy, SEC or FINRA rules, or other policies and procedures of RiverSource Investments are subject to sanctions, ranging from notification of their manager to termination.

An Important Notice Concerning Privacy

This notice provides a description of RiverSource Investments’ privacy policies and practices relating to nonpublic personal information provided by clients. Additional information may be obtained by contacting RiverSource Investments at the address or phone number set forth on the cover of this brochure.

Information Collected by RiverSource Investments. RiverSource Investments may receive nonpublic personal information from its clients (“Client Information”). Client Information RiverSource Investments collects comes primarily from the forms that are completed during the client intake process and from the transactions that clients make with RiverSource Investments and its affiliates, as well as nonaffiliated third parties. RiverSource Investments also may receive Client Information from unaffiliated companies who provide services to RiverSource Investments clients.

Disclosures of Client Information. Client Information relating to current or former RiverSource Investments clients may only be disclosed as authorized by the client or as permitted by law. For example, RiverSource Investments may provide copies of client statements to a third party if a client requests or authorizes such release, or RiverSource Investments may be required to provide Client Information pursuant to a subpoena or other legal mandate. Client Information about a current or former RiverSource Investments client may also be disclosed to entities, whether or not affiliated with RiverSource Investments, that help us to administer, maintain, and service client accounts. Also, unless RiverSource Investments is contractually prohibited, Client Information may be provided to RiverSource Investments' other financial services affiliates in order to assist RiverSource Investments, or the affiliate, in providing or offering products or services to the client. For example, RiverSource Investments may share Client Information with an affiliate that provides retirement services in order to coordinate efforts and offer the best potential array of products and services to current and prospective clients.

Protecting Client Information. RiverSource Investments provides access to Client Information only to those employees and agents (which can include affiliates and non-affiliates) who need the information to perform services for the client or functions on behalf of the client, as well as those affiliates who may be involved in providing or offering services to the client, as described above. RiverSource Investments maintains physical, electronic, and procedural security measures that comply with federal regulations to safeguard Client Information.

This notice is provided to RiverSource Investments' clients as required by federal regulations regarding privacy of consumer financial information.

Information Regarding Regulatory, Governmental Agency and Litigation Matters

A description of certain regulatory, governmental agency and litigation matters is provided below. Where required, RiverSource Investments provides disclosure regarding such matters in Part 1 of its Form ADV.

Regulatory Matters - Settlement Agreements Relating to Market Timing Activities. In November and December 2005, without admitting or denying the allegations, American Express Financial Corporation ("AEFC," which is now known as Ameriprise Financial), the parent company of RiverSource Investments, LLC, finalized settlement agreements with the Securities and Exchange Commission ("SEC") and Minnesota Department of Commerce ("MDOC") relating to market timing activities. The SEC and MDOC allegations indicated that AEFC failed to: (i) adequately disclose market timing activities in mutual fund and variable annuity product prospectuses; (ii) implement procedures to detect and prevent market timing in 401(k) plans for employees of AEFC and related companies and adequately disclose that there were no such procedures; and (iii) in the case of MDOC only, establish written policies and procedures and properly supervise its employees. AEFC was censured and ordered to cease and desist from committing or causing any violations of certain federal and Minnesota securities laws. AEFC agreed to: (i) pay disgorgement of \$10 million and civil money penalties of \$7 million; (ii) make presentations at least annually to its board of directors and the relevant mutual funds' board relating to market timing policies and procedures and related disclosures; (iii) retain an independent distribution consultant to assist in distributing disgorgement and civil penalties; and (iv) submit to the MDOC a compliance review of its market timing procedures within one year, including a certification by a senior officer regarding compliance and supervisory procedures. The SEC order is available at <http://www.sec.gov/litigation/admin/ia-2451.pdf>.

Governmental Agency Matter - Memorandum of Understanding. In January 2005, RiverSource Investments, LLC (then known as American Express Asset Management Group Inc. "AEAMG") and Northwinds Marketing Group LLC, a former affiliate of AEAMG, entered into a memorandum of understanding with the State of Ohio and the Ohio Ethics Commission to resolve a dispute regarding whether any officer, director, employee or agent of AEAMG and/or Northwinds knowingly gave items of value or paid expenses on behalf of Ohio public agencies, officials or employees that were excessive and/or restricted under Ohio law. AEAMG and Northwinds resolved the matter by agreement and compromise, including the payment of \$124,000 to the Ohio Police and Fire Pension Fund and \$40,000 to reimburse expenses incurred by the Ohio Ethics Commission, without admitting any liability or the truth of any claim.

Litigation Matter. In September 2006, the Office of the Attorney General of the State of New York ("NYAG") commenced a civil action in New York State Supreme Court against J. & W. Seligman & Co. Incorporated ("Seligman"), Seligman Advisors, Inc. (now known as RiverSource Fund Distributors, Inc.), Seligman Data Corp. and Brian T. Zino (collectively, the "Seligman Parties"), alleging, in substance, that the Seligman Parties permitted various persons to engage in frequent trading and, as a result, the prospectus disclosure used by the registered investment companies then managed by Seligman is and has

been misleading. The NYAG included other related claims and also claimed that the fees charged by Seligman to the Seligman Funds were excessive.

On March 13, 2009, without admitting or denying any violations of law or wrongdoing, the Seligman Parties entered into a stipulation of settlement with the NYAG and settled the claims made by the NYAG. Under the terms of the settlement, Seligman will pay \$11.3 million to four Seligman Funds. This settlement resolved all outstanding matters between the Seligman Parties and the NYAG. In addition to the foregoing matter, the New York staff of the SEC indicated in September 2005 that it was considering recommending to the Commissioners of the SEC the instituting of a formal action against Seligman and Seligman Advisors, Inc. relating to frequent trading in the Seligman Funds. Seligman responded to the staff in October 2005 that it believed that any action would be both inappropriate and unnecessary, especially in light of the fact that Seligman had previously resolved the underlying issue with the Independent Directors of the Seligman Funds and made recompense to the affected Seligman Funds. There have been no further developments with the SEC on this matter.

Ameriprise Financial, Inc. and certain of its affiliates, including RiverSource Investments, have been involved in other legal, arbitration and/or regulatory matters concerning their respective business activities. These matters include routine litigation, class actions, and regulatory or governmental agency examinations and investigations. As a matter of policy, RiverSource Investments does not typically provide copies of deficiency letters or responses stemming from regulatory or governmental examinations or investigations, or publish information relating to ongoing exams, investigations or litigation. However, upon request of a prospective or current client, RiverSource Investments may communicate the results of completed exams, investigations or litigation or the status of ongoing matters.

Ameriprise Financial and RiverSource Investments believe that neither of them, nor any of their affiliates, is currently the subject of any pending legal, arbitration, regulatory or other governmental matters that are likely to have a material adverse effect on Ameriprise Financial's financial condition or the ability of RiverSource Investments to meet its contractual commitments to clients. Ameriprise Financial is required to make 10Q, 10-K and, as necessary, 8-K filings with the Securities and Exchange Commission on legal and regulatory matters that relate to Ameriprise Financial and its affiliates. Copies of these filings may be obtained by accessing the SEC website at www.sec.gov.