

- This form is recommended to document Best Interest review and Disclosure Delivery when the RightBRIDGE Product Profiler is not required (**New Business and Subsequent Transactions Reference Sheet**)
- It may also be used when the TDF or CAT forms are not required (such as trading within NFS brokerage and other recommendations); and/or when there is a recommendation of a complex or “Yellow” Product category (per the RightBRIDGE Product Profiler).
- This form may be completed and uploaded to C360, or retained in the client file, to document why the transaction(s) is/are in the client’s Best Interest.

Documentation is critical to explain why a recommendation is in a retail customer’s **best interest** at the time of recommendation. If you choose to not use the form in scenarios where it is not explicitly required, the below details should be documented in the client file.

Remember that the level of detail should generally align with the complexity of the recommendation and/or the client’s financial situation, including your analysis of the **reasonable available alternatives and their costs**.

Client Name \_\_\_\_\_

RightBRIDGE Product Profiler Case # \_\_\_\_\_ (when required)

Date of Disclosure Delivery # \_\_\_\_\_

**In certain situations, MMLIS does not require RightBRIDGE Product Profiler (link here). In these circumstances, you must document the date of disclosure delivery in your file or on this form.**

**Reminder:** Form CRS: Reps must deliver this form to each retail investor (both broker dealer and investment advisory) prior to or at the time a recommendation is made.

*For new retail investors, this means that reps must provide Form CRS at the earliest of recommending an account type, a securities transaction, an investment strategy involving securities, placing an order, or opening a new account for an existing client.*

*For new accounts for existing clients or subsequent transactions in existing accounts, reps must provide Form CRS again to broker dealer or investment advisory retail investors prior to opening a different or additional account, recommending a rollover into a new or existing account, or recommending or providing new broker dealer or investment advisory service. Form CRS is required even if the transaction does not necessarily involve opening a new account with the firm (e.g., a direct mutual fund or variable annuity or referral program).*

Are you an Investment Adviser Representative affiliated with CRIA? Click one:  Yes  No

**You can explain why you are recommending this solution for your client by answering the following questions.** Please include any relevant information, including comments on costs of the prior account/product, recommended account/product/trade and alternative account/products/trades.

1. Identify the transaction/recommendation (i.e., trade in NFS Brokerage; SEP IRA Rollover; Additional account funding, etc):
  
2. Why is this recommendation in the client’s Best Interest?
  
3. How is the recommendation consistent with the client’s investment objectives?
  
4. Why was this account type (Brokerage or Managed), product (Variable Annuity, Variable Life, Stocks, Bonds, Mutual Funds, ETFs, UITs, etc) recommended over other account/product categories, and what is the advantage the customer will gain by utilizing this account/product?
  
5. What alternative account types, products or solutions were considered for the client(s)?  
There must be at least one other Account type AND Specific Product considered.

**List specific product/funds/trades considered. E.g. Jackson Perspective II and MassMutual Envision**

<b>Account Type</b>	<b>Specific Products considered</b>	<b>Advantages</b>	<b>Risks</b>
<b>NFS Brokerage / Direct</b>			
<b>Managed</b>			
<b>Variable Life</b>			
<b>Variable Annuity</b>			
<b>Other Solutions</b>			

6. Why were these alternative solutions not selected?

7. What additional account/products, if any, are you also recommending as part as part of this transaction/ series of transactions?

Account Type	Specific Products considered	Advantages	Risks
NFS Brokerage / Direct			
Managed			
Variable Life			
Variable Annuity			
Other Solutions			

8. What due diligence was performed to determine this account/product type was a better option based on the client's needs?

- RightBRIDGE
- Illustrations
- Authorized Research (in files)
- Sales Manager consultation
- Morningstar
- FINRA Fee Analyzer
- Investment Specialist Consultation
- Financial Plan
- Other \_\_\_\_\_

Free Space for Any Additional Notes: