

# Pacific Select Distributors, LLC | Regulation Best Interest Disclosure Document

As of 3/21/22

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Pacific Select Distributors, LLC (“PSD,” “we,” “our,” “us,” or “our firm”) provides this disclosure document (this “Regulation Best Interest Disclosure Document”) to ensure that you are informed about the services our firm offers and your relationship with our firm. Among other things, this Regulation Best Interest Disclosure Document provides you with material facts relating to: (1) the scope and terms of our relationship with you, including the capacity in which we and our registered representatives (referred to herein as “financial professionals”) are acting, the type and scope of our services, material limitations on our services, and the material fees and costs of our products, and (2) conflicts of interest that exist for us and our financial professionals in connection with the recommendations we make to you.

You are encouraged to review this Regulation Best Interest Disclosure Document in detail and contact our financial professionals with any questions you may have. If you would like another copy of this Regulation Best Interest Disclosure Document, please feel free to access and download it from our website at [PacificLife.com](http://PacificLife.com). You also may request another copy of this Regulation Best Interest Disclosure Document by contacting us at (800) 722-4448.

## **Scope of our relationship with you**

We are a wholly-owned subsidiary of Pacific Life Insurance Company and an affiliate of Pacific Life & Annuity Company, New York (collectively, “Pacific Life”), and distribute variable annuities, variable life insurance issued by Pacific Life, as well as mutual funds. We are registered with the U.S. Securities and Exchange Commission (“SEC”) as a broker-dealer and are a member of the Financial Industry Regulatory Authority, Inc. (“FINRA”). Our relationship with you is very limited and begins when your investment adviser representative (referred to in the product prospectus as your “financial professional”) refers you to us. In our capacity as an SEC-registered broker-dealer, we can offer you the broker-dealer services described below. In our capacity as a broker-dealer, we are subject to the following laws and regulations: Securities Act of 1933, Securities Exchange Act of 1934, rules of FINRA, and applicable state laws.

Before or at the time you enter a broker-dealer relationship with us, you will receive our Form CRS which provides easy-to-understand information about the services we offer, fees and costs, conflicts of interest, and disciplinary history, among other information. Our Form CRS is available at [PacificLife.com](http://PacificLife.com). You also may request a copy of our Form CRS from our financial professionals or by contacting us at (800) 722-4448. Additionally, free and simple tools are available for you to research firms and financial professionals, including us and our financial professionals, at [Investor.gov/CRS](http://Investor.gov/CRS) which also provides educational materials about broker-dealers, investment advisers, and investing.

## **What investment services do we provide?**

**Broker-dealer services:** In our capacity as an SEC-registered broker-dealer, our financial professionals can recommend and execute securities transactions. Our relationship with you is limited and begins when your investment adviser representative refers you to us. Our financial professionals will review your investment profile and may make a recommendation regarding a Pacific Life annuity if doing so is in your best interest. If you want to purchase the annuity, PSD then serves as broker-dealer of record and insurance agency for the transaction. When you purchase a variable annuity from Pacific Life, your variable annuity is held directly at the insurance company. We do not open a brokerage account for you or otherwise hold or monitor your variable annuity in a brokerage account.

**Our basis for recommendations:** Our financial professionals must have a reasonable basis to believe that each recommendation made to you is in your best interest. Our financial professionals examine the potential risks, rewards, costs, and other characteristics of the annuity in consideration with your investment profile. Your investment profile includes, but is not limited to, your age, other investments, financial situation and needs, tax status, investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance, and any other information that you may disclose to our financial professionals. We also require our financial professionals have a reasonable basis to believe that each recommendation made to you does not place our firm’s or our financial professional’s financial or other interests ahead of your interests.

## **Material limitations on our services**

We have several material limitations on the type of services we provide and the scope of our services. The material limitations on our services are explained below.

**Proprietary products and services:** Our recommendations are limited to products offered by Pacific Life through the Advisory Solutions Desk. If you purchase a variable annuity and allocate your investment to the available subaccounts, which in turn invest in underlying mutual funds (“Funds”), these Funds are managed by third-party asset managers (“Asset Managers”). The Asset Managers implement the investment objectives of the Funds.

If you choose to invest in subaccounts investing in the Funds within the variable annuity, your assets are held in a separate account. This separate account is segregated from assets held in the insurance company’s general account but is still an accounting and reporting account held by Pacific Life. By investing in subaccounts available under your variable annuity, the separate account provides access to the Funds and Asset Managers in order to align with your investment objectives and tolerance for risk. There is inherent risk associated with each subaccount (each of which invests in a Fund) that may cause the variable annuity contract to lose value.

**No Ongoing Monitoring:** Your variable annuity is held directly at Pacific Life. Neither our financial professionals nor Pacific Life provides ongoing monitoring of your variable annuity (including variable annuities recommended to you) or your investment performance. This is a material limitation on our services and the services of our financial professionals. If you desire to have your variable annuity monitored on an ongoing basis, ask your investment advisor representative about the scope of your advisory account relationship.

**Limitations of investments offered:** We do not offer a wide range of investments. We also do not offer every type of insurance product. We offer only one proprietary annuity through the Advisory Solutions Desk, which means our financial professionals are limited to recommending one annuity product offered by Pacific Life.

**Product offering**

The following variable annuity is available through PSD for its Independent Registered Investment Adviser channel: Pacific Advisory Variable Annuity

The prospectus for the Pacific Advisory Variable Annuity can be found here: [PacificLife.com](http://PacificLife.com)

Each annuity product has unique features, benefits, and charges. Annuities are long-term, tax-deferred vehicles designed for retirement. Variable annuities have investment risk and may lose value. Earnings are taxable as ordinary income when distributed and may be subject to a 10% additional tax if withdrawn before age 59½. Optional benefits are available for an extra charge in addition to the ongoing fees and expenses of the annuity. Ask your financial professional about optional benefit availability and the details.

Each annuity product carries inherent risks. Please review the annuity product to understand what inherent risks are associated with the product. Each annuity product bears different material fees and costs. See below for more detailed information regarding the Pacific Advisory Variable Annuity product fees and costs. Please note the below listed material fees and costs are not the only charges that you may incur. If there is a difference in the figures within this document and those in the annuity product prospectus or contract, the product prospectus and contract control.

**Fees and costs:**

This section provides information about the material fees and costs that apply to our Pacific Advisory Variable Annuity product. There are fees and costs associated with our annuity product regardless of whether you make or lose money on your investment. Fees and costs will reduce the value of your annuity contract. Below is information about the annuity product and its material fees and costs. This annuity product has optional benefits. For more details about any of the information given below or about the fees and costs associated with the optional benefits selections, please view the annuity product prospectus. This section does not include any advisory fees paid to your investment advisor representative for advisory services provided to you. Such fees are covered in a separate agreement between you and your investment advisor representative.

**Pacific Advisory Variable Annuity**

<b>Minimum Initial Premium</b>	\$25,000
<b>Minimum Additional Premiums</b>	\$250 (non-qualified) \$50 (qualified)
<b>Maximum Premiums</b>	\$1 million. For aggregate purchase payments totaling more than \$1 million, contact Pacific Life for potential approval.
<b>Front-End Sales Charges</b>	None
<b>Withdrawal Charges</b>	None
<b>Premium Taxes % of each Premium</b>	0% - 3.5% (varies by state)
<b>Transfer Fee</b>	The first 25 transfers in a contract year are free. Thereafter, \$25 per transfer

<b>Annuity Contract Charges</b>	<b>Underlying Fund Operating Expenses</b>	<b>Optional Benefits</b>
<ul style="list-style-type: none"> <li>• Mortality and Expense Risk: 0.15%</li> <li>• Administrative Fee: 0.15%</li> <li>• Platform Fee: 0.15%</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum: 0.03%</li> <li>• Maximum: 1.00%</li> </ul>	<ul style="list-style-type: none"> <li>• Return of Investment Death Benefit: 0.15%</li> <li>• Portfolio Income Protector Living Benefit:               <ul style="list-style-type: none"> <li>▪ 1.25% Single Life option</li> <li>▪ 1.50% Joint Life option</li> </ul> </li> </ul>

**Conflicts of interest**

We have identified certain conflicts of interest (“conflicts”) that relate to the recommendations we and our financial professionals make. A conflict arises when an economic or other benefit has the potential to incentivize us or our financial professionals to put our interest or the financial professionals’ interest above your interests. We will disclose and mitigate these conflicts of interest to ensure that your best interests and investment objectives are met. The below section discloses material facts relating to conflicts so that you are able to make an informed decision regarding any recommendations a financial professional makes to you.

### ***Conflicts for both our firm and our financial professionals***

**Proprietary Products/Asset Management:** We exclusively sell products issued by Pacific Life. Pacific Asset Management LLC and Pacific Life Fund Advisors LLC, two affiliates of Pacific Life, also serve as Asset Managers for some Funds underlying the Pacific Life annuity products. This mutual relationship between affiliated companies could influence us or our financial professionals to put greater emphasis on subaccounts investing in Funds advised by an affiliated company.

Because we only offer products and services issued by Pacific Life, similar products from other insurance companies are not considered as part of our recommendation. In addition, Pacific Life or its affiliates may be paid a fee on these products. These fees are not paid directly by you, and the individuals who may recommend Pacific Life products are not paid sales-based compensation.

**Service Arrangements:** Pacific Life has entered into services agreements with certain Funds, or Fund affiliates, which pay Pacific Life for administrative and other services, including, but not limited to, certain communications and support services. The fees are based on an annual percentage of average daily net assets of certain Fund portfolios purchased by Pacific Life at Contract Owner's instructions. Currently, the fees received do not exceed an annual percentage of 0.25% of the average net assets allocated to a Fund and each Fund (or Fund affiliate) may not pay the same annual percentage (some may pay significantly less). Because Pacific Life receives such fees, Pacific Life may be subject to competing interests in making these Funds available as Investment Options under the annuity. In addition, these payments may incentivize us and our financial professionals to consider subaccounts investing in Funds that entail these payments rather than Funds that do not entail these payments or entail comparatively lower payments

### ***Conflicts for our financial professionals alone***

**Bonus Compensation:** We compensate our financial professionals (who we call Advisory Solutions Desk Associates) with a base salary and an annual discretionary bonus. The amount of the annual bonus is based on a percentage of the financial professional's salary, varies by the financial professional's title, and is tied to overall company performance and how well the individual financial professional performs his or her job. Annual bonuses may create a conflict between your financial professional's interest and your own when recommending annuity products to you.

**Non-Cash Compensation:** Our financial professionals may receive merchandise and gifts up to a total value of \$100 per Asset Manager, service provider, or other third-party per year, consistent with FINRA rules. Third parties may occasionally provide our financial professionals with meals and entertainment of reasonable value. This non-cash compensation creates a potential conflict of interest to the extent that it may cause financial professionals to prefer those Asset Managers or other third parties over others.

**Outside business activities:** Some of our financial professionals engage in business activity outside the scope of their relationship with us. If your financial professional engages in an outside business activity, the activity may take away from, or in instances compromise, their responsibility to you. You may research any outside business activities your financial professional may have on FINRA's BrokerCheck website at [BrokerCheck.finra.org](http://BrokerCheck.finra.org).

### **Mitigation of conflicts**

We have taken various steps to mitigate, disclose and/or eliminate these conflicts associated with recommendations made to you, including developing policies and procedures, supervisory systems, processes and controls, compensation and incentive policies, disclosures, annual certifications and training. If you have any questions about conflicts of interest, please talk with your financial professional or review the information referenced throughout this document.

### **Additional information**

Firm disclosures and information about our financial professionals can be found on [BrokerCheck.finra.org](http://BrokerCheck.finra.org). For even more information about our financial professionals, customers may also visit [Investor.gov/CRS](http://Investor.gov/CRS).

All Pacific Life entities' forms and filings with the SEC can be found through searching "Pacific Life" on [SEC.gov](http://SEC.gov).