

UNITED STATES OF AMERICA
BEFORE THE
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT COMPANY ACT OF 1940
Release No. 27999 / September 27, 2007

In the Matter of :
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 FINANCIAL INVESTORS VARIABLE INSURANCE TRUST, ET AL. :
 1290 Broadway, Suite 1100 :
 Denver, Colorado 80203 :
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 (812-13359) :
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ORDER UNDER SECTION 6(c) OF THE INVESTMENT COMPANY ACT OF 1940
GRANTING EXEMPTIONS FROM THE PROVISIONS OF SECTIONS 9(a), 13(a),
15(a) AND 15(b) OF THE 1940 ACT, AND RULES 6e-2(b)(15) and 6e-3(T)(b)(15)
THEREUNDER

Financial Investors Variable Insurance Trust (the “Trust”) and ALPS Advisers, Inc. (the “Investment Adviser”) filed an application on January 26, 2007, and an amended and restated application on May 21, 2007, for an order under Section 6(c) of the Investment Company Act of 1940, as amended (the “1940 Act”), granting exemptions from the provisions of Sections 9(a), 13(a), 15(a) and 15(b) of the 1940 Act and Rules 6e-2(b)(15) and 6e-3(T)(b)(15) thereunder, to the extent necessary to permit shares of the Trust and shares of any other investment company or portfolio that is designed to fund insurance products and for which the Investment Adviser or any of its affiliates, may serve in the future as investment manager, investment adviser, subadviser, administrator, principal underwriter, or sponsor (collectively, the “Insurance Funds”) to be sold to and held by: (a) separate accounts funding variable annuity contracts and variable life insurance policies issued by both affiliated life insurance companies and unaffiliated life insurance companies; (b) trustees of qualified group pension and group retirement plans outside of the separate account context; (c) separate accounts that are not registered as investment companies under the 1940 Act pursuant to exemptions from registration under Section 3(c) of the 1940 Act; (d) any adviser to an Insurance Fund for the purpose of providing seed capital to an Insurance Fund; and (e) any other account of a participating insurance company permitted to hold shares of an Insurance Fund.

A notice of the filing of the application was issued on September 4, 2007 (Investment Company Act Release No. 27965). The notice gave interested persons an opportunity to request a hearing and stated that an order disposing of the matter would be issued unless a hearing should be ordered. No request for a hearing has been received, and the Commission has not ordered a hearing.

The matter has been considered, and it is found that the granting of the requested exemptions is appropriate in the public interest and consistent with the protection of investors and the purposes fairly intended by the policy and provisions of the 1940 Act. Accordingly,

IT IS ORDERED, pursuant to Section 6(c) of the 1940 Act, that the requested exemptions from the provisions of Sections 9(a), 13(a), 15(a) and 15(b) of the 1940 Act, and Rules 6e-2(b)(15) and 6e-3(T)(b)(15) thereunder, for Financial Investors Variable Insurance Trust, et al. (812-13359) be, and hereby are, granted, effective immediately.

For the Commission, by the Division of Investment Management, pursuant to delegated authority.

Florence E. Harmon
Deputy Secretary