User Guidance

www.adviserinfo.sec.gov

IAPD Report

ROBERT VINCENT KROMER JR

CRD# 1448765

When communicating online or investing with any professional, make sure you know who you're dealing with. Imposters might link to sites like BrokerCheck from phishing or similar scam websites, or through social media, trying to steal your personal information or your money.

Please contact FINRA with any concerns.

IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page http://www.nasaa.org/IAPD/IARReports.cfm

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association http://www.nasaa.org

Report Summary

ROBERT VINCENT KROMER JR (CRD# 1448765)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **05/11/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	RK RETIREMENT SOLUTIONS LLC	CRD# 289018	08/21/2017

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.
Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	SECURITIES AMERICA ADVISORS, INC.	110518	SUN CITY WEST, AZ	01/05/2015 - 08/15/2017
B	SECURITIES AMERICA, INC.	10205	SUN CITY WEST, AZ	07/17/2014 - 08/15/2017
B	DALTON STRATEGIC INVESTMENT SERVICES INC.	23485	FINLAYSON, MN	06/16/2011 - 08/13/2014

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Civil Event	1
Customer Dispute	5
Termination	1

Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works.
This individual is currently registered with **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **RK RETIREMENT SOLUTIONS LLC**
Main Address: SUN CITY WEST, AZ
Firm ID#: 289018

	Regulator	Registration	Status	Date
IA	Arizona	Investment Adviser Representative	Approved	08/21/2017
IA	Minnesota	Investment Adviser Representative	Approved - Pending IAR CE	01/01/2026
IA	Texas	Investment Adviser Representative	Restricted Approval	06/09/2025

Branch Office Locations

RK RETIREMENT SOLUTIONS LLC
SUN CITY WEST, AZ

Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 1 principal/supervisory exam, 3 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
B	General Securities Principal Examination (S24)	Series 24	01/15/1998

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	08/15/2017
B	General Securities Representative Examination (S7)	Series 7	08/05/1997
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	12/21/1985

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	11/06/2014
B	Uniform Securities Agent State Law Examination (S63)	Series 63	12/23/1985

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.

Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/05/2015 - 08/15/2017	SECURITIES AMERICA ADVISORS, INC.	CRD# 110518	SUN CITY WEST, AZ
B	07/17/2014 - 08/15/2017	SECURITIES AMERICA, INC.	CRD# 10205	SUN CITY WEST, AZ
B	06/16/2011 - 08/13/2014	DALTON STRATEGIC INVESTMENT SERVICES INC.	CRD# 23485	FINLAYSON, MN
B	10/31/2003 - 06/16/2011	WORKMAN SECURITIES CORPORATION	CRD# 31898	FINLAYSON, MN
B	09/06/2000 - 11/04/2003	USALLIANZ SECURITIES, INC.	CRD# 40875	MINNEAPOLIS, MN
B	03/07/1996 - 10/05/2000	TOWER SQUARE SECURITIES, INC.	CRD# 833	EL SEGUNDO, CA
B	08/15/1994 - 03/04/1996	ADVANTAGE CAPITAL CORPORATION	CRD# 146	ATLANTA, GA
B	04/19/1993 - 08/15/1994	TRAVELERS EQUITIES SALES, INC.	CRD# 833	EL SEGUNDO, CA
B	08/05/1992 - 01/27/1993	METLIFE SECURITIES INC.	CRD# 14251	SPRINGFIELD, MA
B	08/05/1992 - 01/27/1993	METROPOLITAN LIFE INSURANCE COMPANY	CRD# 4095	NEW YORK, NY
B	12/24/1985 - 01/06/1992	PRUCO SECURITIES CORPORATION	CRD# 5685	NEWARK, NJ

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
07/2017 - Present	RK Retirement Solutions LLC	Managing Member/Investment Advisor Representative	Y	Sun City, AZ, United States
05/2017 - 07/2017	SECURITIES AMERICA ADVISORS, INC.	Investment Advisor Representative	Y	FINLAYSON, MN, United States
07/2014 - 07/2017	SECURITIES AMERICA, INC.	REGISTERED REPRESENTATIVE	Y	FINLAYSON, MN, United States

Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
10/1996 - 07/2017	MIDWEST FINANCIAL GROUP, INC.	PRESIDENT/INSURANCE AGENT	Y	SHOREVIEW, MN, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

No information reported.

Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least $5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending, on appeal,* or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated, settled* or *otherwise resolved*.
  - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
  - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.

DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Civil Event	1
Customer Dispute	5
Termination	1

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Individual
Regulatory Action Initiated By:	DEPT OF COMMERCE AND REGULATION, STATE OF SOUTH DAKOTA
Sanction(s) Sought:	Other
Other Sanction(s) Sought:	ANSWERED QUESTION #7 NO, SHOULD HAVE BEEN YES, FINED $200. APPLICATION FOR RESIDENT INSURANCE LICENSE QUESTION #7. (HAS ANY INSURANCE COMPANY TERMINATED YOUR CONTRACT FOR CAUSE?)WAS ANSWERED NO, THEY SAID IT SHOULD HAVE BEEN YES. I WAS FINED $200.00. A CONSENT ORDER LETTER WAS GIVEN TO ME, A COPY HAS BEEN FORWARDED TO NASD ON 8/8/2000.
Date Initiated:	06/09/1992
Docket/Case Number:	NO CASE #, ONLY CONSENT ORDER LETTER
Employing firm when activity occurred which led to the regulatory action:	METROPOLITAN
Product Type:	Insurance
Other Product Type(s):	(LIFE INSURANCE)
Allegations:	CONSENT ORDER LETTER IS BEING MAILED TO NASD. ANSWERED QUESTION #7 ON RESIDENT INSURANCE APPLICATION ABOUT BEING TERMINATED FOR CAUSE NO, THEY SAID IT SHOULD HAVE BEEN YES. I BASED MY ANSWER ON I COLLECTED UNEMPLOYMENT AND IN MN THEY DON'T PAY IF YOU WERE TERMINATED FOR CAUSE, AND

	MANAGEMENT PEOPLE AT METROPOLITAN INSURANCE COMPANY TOLD ME THEY THOUGHT IT SHOULD BE ANSWERED NO.
Current Status:	Final
Resolution:	Consent
Resolution Date:	08/10/1992
Sanctions Ordered:	Monetary/Fine $200.00
Other Sanctions Ordered:	
Sanction Details:	I WAS FINED $200.00. IT WAS PAID 08/04/1992
Broker Statement	EXPLAINED IN #7 ABOVE. 23D 1,2,4 ARE ALL ANSWERED ON THIS DRP DUE TO ALL ARE RELATED TO THE SAME SITUATION DESCRIBED ON THIS DRP.

Civil Event

This disclosure event involves an injunction issued by a foreign or domestic court in connection with investment-related activity, a finding by a domestic or foreign court of a violation of any investment-related statute or regulation, or an action dismissed by a domestic or foreign court pursuant to a settlement agreement.

Disclosure 1 of 1

Reporting Source:	Individual
Initiated By:	Ernest Kauppi
Relief Sought:	Restitution
Date Court Action Filed:	04/01/2026
Date Notice/Process Served:	04/14/2026
Product Type:	Debt-Corporate Viatical Settlement
Type of Court:	State Court
Name of Court:	District Court State of Minnesota
Location of Court:	St. Louis County
Docket/Case #:	69VI-CV-26-200
Employing firm when activity occurred which led to the action:	RK Retirement Solutions, LLC
Allegations:	The named Plaintiff Alleges the following claims against defendents: RK Retirement Solutions & Robert Kromer: Negligence, Fraud, Misrepresentation, and Negligent Misrepresentation
Current Status:	Pending
Limitations or Restrictions in Effect During Appeal:	None
Broker Statement	Plaintiff claims he was unaware of the risk profile and the partial illiquidity of certain assets that have lost value or filed bankruptcy while under management at RK Retirement Solutions, LLC.

Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 5

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	RK Retirement Solutions, LLC
Allegations:	Plaintiff alleged claim against RK Retirement Solutions, LLC & Robert Kromer of the following: Negligence, Fraud, Misrepresentation, and Negligent Misrepresentation for specific assets that the plaintiff alleges he was unaware of the risk, illiquid portion of investments and bankruptcy of one of the companies from investments made in 2017, Alleges that RK Retirement Solutions & Robert Kromer tried to misrepresent specific assets to him.
Product Type:	Debt-Corporate Viatical Settlement
Alleged Damages:	$0.00
Alleged Damages Amount Explanation (if amount not exact):	Plaintiff is seeking restitution from RK Retirement Solutions for specific assets that lost value or filed for bankruptcy.

Customer Complaint Information

Date Complaint Received:	04/14/2026
Complaint Pending?	Yes
Settlement Amount:	
Individual Contribution Amount:	

Civil Litigation Information

Type of Court:	State Court
Name of Court:	District Court State of Minnesota
Location of Court:	St. Louis County
Docket/Case #:	69VI-CV-26-200
Date Notice/Process Served:	04/14/2026
Litigation Pending?	Yes
Broker Statement	RK Retirement Solutions, LLC & Robert Kromer admit to no fault to the allegations. The plaintiff/client had signed and initialled sections of disclosures stating he was aware of the risk and of its illiquid nature for income purposes. One investment was from 2017 and filed bankruptcy in 2022, which RK Retirement Solutions, LLC or Robert Kromer had no control over.

Disclosure 2 of 5

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	TOWER SQUARE SECURITIES
Allegations:	CUSTOMER ALLEGED THE REPRESENTATIVE INVESTED HER MONEY IN AN UNSUITABLE VARIABLE UNIVERSAL LIFE INSURANCE POLICY, IN JULY 1996. CUSTOMER HAS ALLEGED DAMAGES AS NOTED BELOW.
Product Type:	Annuity-Variable
Alleged Damages:	$400,000.00
Alleged Damages Amount Explanation (if amount not exact):	DAMAGES TO BE PROVEN BUT AT LEAST THE AMOUNT LISTED.

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA DISPUTE RESOLUTION ARBITRATION
Docket/Case #:	11-02624
Date Notice/Process Served:	08/02/2011
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	09/28/2012
Monetary Compensation Amount:	$70,000.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	TOWER SQUARE SECURITIES
Allegations:	CUSTOMER ALLEGES THE REP SOLD HER A VARIABLE UNIVERSAL LIFE INSURANCE POLICY IN 1996 THAT WAS UNSUITABLE.
Product Type:	Other: VARIABLE UNIVERSAL LIFE INSURANCE
Alleged Damages:	$400,000.00
Alleged Damages Amount Explanation (if amount not exact):	THE STATEMENT OF CLAIM INDICATES 'NEARLY $500,000 IN CASH' IN THE INTRODUCTION AND SUMMARY OF CLAIM BUT USES A FIGURE OF 'OVER $400,000 IN CASH' IN THE STATEMENT OF FACTS.

Customer Complaint Information

Date Complaint Received:	
Complaint Pending?	No
Status:	Settled
Status Date:	09/28/2012

Settlement Amount:	$0.00
Individual Contribution Amount:	$0.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA DISPUTE RESOLUTION ARBITRATION
Docket/Case #:	11-02624
Date Notice/Process Served:	08/02/2011
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	09/28/2012
Monetary Compensation Amount:	$70,000.00
Individual Contribution Amount:	$0.00

Disclosure 3 of 5

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	
Allegations:	WITH REGARD TO THE 1990 PRUCHASE OF A VARIABLE APPRECIABLE LIFE (VAL) NSURANCE CONTRACT THE CLIENT ALLEGED. "THIS NOTE IS TO LET YOU KNOW OF THE MIS-REPRESENTATION I FEEL WAS GIVEN TO ME... I BELIEVED I WAS PURCHASING A SINGLE VARIABLE APPRECIABLE LIFE INSURANCE POLICY FOR MYSELF WITH A $28,000 INITIAL INVESTMENT. IT TURNS OUT I ENDED UP WITH TWO POLICIES; ONE FOR MYSELF AND ONE FOR MY WIFE." NO MONETARY DAMAGES WERE ALLEGED.
Product Type:	
Alleged Damages:	

Customer Complaint Information

Date Complaint Received:	06/03/1992
Complaint Pending?	No
Status:	Settled
Status Date:	
Settlement Amount:	$12,609.73
Individual Contribution Amount:	
Firm Statement	THE COMPANY CANCELED [CUSTOMER'S] VAL CONTRACT AND APPLIED THE PREMIUMS PAYMENTS ($12,609.73) TO [SPOUSE'S] VAL CONTRACT. THE COMPANY IS REPORTING THIS ALLEGATION AND SETTLEMENT TO COMPLY WITH NASD RULE AND REQUIREMENTS

PERTIANING
TO THE REPORTING OF CERTAIN CUSTOMER ALLEGATIONS AND ALL SETTLEMENTS OF $5,000 OR MORE. THE COMPANY BY THIS FILING MMAKES NO ALLEGATIONS REGARDING THE ACTIONS OF THE REPRESENTATIVE.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: PRUDENTIAL

Allegations: DIDN`T KNOW THERE WAS A POLICY ISSUED ON WIFE.

Product Type: Insurance

Other Product Type(s): (VARIABLE UNIVERSAL LIFE INSURANCE)

Alleged Damages: $0.00

Customer Complaint Information

Date Complaint Received: 06/03/1992

Complaint Pending? No

Status: Settled

Status Date: 11/01/1996

Settlement Amount: $12,609.73

Individual Contribution Amount: $0.00

Broker Statement CANCELED [CUSTOMER]`S POLICY AND PUT VALUES INTO [CUSTOMER] CONTRACT. GARTH PEEL WAS THE AGENT ON THESE CASES. BOTH PEOPLE HAD DOCTOR EXAMS AND TWO CONTRACTS WERE DELIVERED. THEY KNEW BOTH HAD POLICIES. [CUSTOMER] DISCUSSED THIS WITH HIS SON BEFORE DECIDING TO TAKE THE POLICIES. ALSO HE HAD C.D.S. COMING DUE HE WAS GOING TO PUT INTO THE POLICIES.

Disclosure 4 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

Allegations: WITH REGARD TO THE 1987 PURCHASE OF A VARIABLE APPRECIABLE LIFE (VAL) INSURANCE CONTRAC THE CLIENT STATES THAT HE CASH SURRENDERED SOME OLDER POLICIES TO PUT MONEY INTO HIS NEW POLICY. THE CLIENT WAS TOLD THAT NO MORE MONEY WOULD BE REQUIRED OF THE NEW POLICY. (NO MONETARY DAMAGES ALLEGED)

Product Type:

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 04/09/1996

Complaint Pending? No

Status: Settled

Status Date:

Settlement Amount: $27,000.00

Individual Contribution Amount: $0.00

Firm Statement THE COMPANY ADJUSTED THE PRICE OF THE CONTRACT
SO THAT NO FURTHER OUT OF POCKET PREMIUM PAYMENTS ARE
REQUIRED
OF THE POLICY OWNER (ESTIMATED COST $27,000).
THE COMPANY IS REPORTING THIS SETTLEMENT TO
COMPLY WITH NASD REQUIREMENTS PERTAINING TO THE REPORTING OF
ALL SETTLEMENTS OF $5,000 OR MORE. THE COMPANY MAKES NO
ALLEGATIONS REGARDING THE ACTIONS OF THE REPRESENTATIVE.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: PRUDENTIAL

Allegations: SOLD VAL CONTRACT- CLIENT SAID HE WAS TOLD NO
MORE MONEY WOULD BE REQUIRED OF THE NEW POLICY.

Product Type: Insurance

Other Product Type(s): (VARIABLE UNIVERSAL LIFE INSURANCE)

Alleged Damages: $0.00

Customer Complaint Information

Date Complaint Received: 04/09/1996

Complaint Pending? No

Status: Settled

Status Date: 01/01/1997

Settlement Amount: $27,000.00

Individual Contribution Amount: $0.00

Broker Statement ADJUSTED PRICE OF CONTRACT SO NO FURTHER OUT OF POCKET
PREMIUMS NEEDED. [CUSTOMER] WAS TOLD IF THE RETURN AVERAGED
10% OR BETTER HE WOULD NEVER HAVE TO PUT MORE MONEY IN THE
CONTRACT AND HIS WIFE WAS PRESENT. I NEVER TOLD HIM NO MORE
MONEY WOULD BE REQUIRED. IT WAS JUST THE OPPOSITE. HE PUT
ADDITIONAL MONEY IN ON AT LEAST ONE OCCASSION AFTER THE
ORIGINAL SALE.

Disclosure 5 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:

Allegations: WITH REGARD TO THE 1989 PURCHASES OF TWO APPRECIABLE LIFE (AL) INSURANCE CONTRACTS, THE CLIENT ALLEGED, "...BOB TOLD US WE HAD PAID UP POLICIES..." (NO MONETARY DAMAGES WERE ALLEGED.)

Product Type:

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 11/26/1991

Complaint Pending? No

Status: Settled

Status Date:

Settlement Amount: $27,547.98

Individual Contribution Amount:

Firm Statement THE COMPANY CANCELED THE AL CONTRACTS AND REFUNDED THE PREMIUMS PAID OF $27,547.98.
THE COMPANY IS REPORTING THIS ALLEGATION AND SETTLEMENT TO COMPLY WITH NASD RULES AND REQUIREMENTS PERTIANING TO THE REPORTING OF CERTAIN CUSTOMER ALLEGATIONS AND
ALL SETTLEMENTS OF $5,000 OR MORE. THE COMPANY BY THIS FILING MAKES NO ALLEGATIONS REGARDING THE ACTIONS OF THE REPRESENTATIVE.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: PRUDENTIAL

Allegations: TWO AL SOLD AS PAID UP POLICIES.

Product Type: Insurance

Other Product Type(s): (UNIVERSAL LIFE)

Alleged Damages: $0.00

Customer Complaint Information

Date Complaint Received: 11/26/1991

Complaint Pending? No

Status: Settled

Status Date: 01/01/1992

Settlement Amount: $27,547.98

Individual Contribution Amount: $0.00

Broker Statement	REFUNDED PREMIUMS. I DON`T KNOW WHO THE AGENT WAS ON THIS CASE. I WAS A SALES MANAGER IN 1989 AND DID NOT WRITE ANY PERSONAL PRODUCTION. ALSO, I`VE NEVER TOLD ANYONE THEY HAD PAID UP POLICIES, UNLESS IT WAS A SINGLE PREMIUM POLICY.

Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 1

Reporting Source:	Individual
Firm Name:	PRUDENTIAL INSURANCE COMPANY OF AMERICA
Termination Type:	Discharged
Termination Date:	11/21/1991
Allegations:	ABUSE OF COMMISSIONS ON LIFE SALES ABUSE OF COMMISSION PAYMENTS
Product Type:	Insurance
Other Product Types:	(LIFE INSURANCE)
Broker Statement	NASD DETERMINED NO ACTION WARRANTED ON APPROXIMATELY 6/1992, NOT SURE OF EXACT DATE. PRUDENTIAL SAID I PROMOTED FRAUD TO GENERATE MGT BONUSES. I WASN'T ELIGIBLE FOR BONUSES I WAS ON A FIXED SALARY. NASD DID INVESTIGATE AND I WAS CLEARED OF ANY WRONG DOING. 11/21/1991 PRUDENTIAL TERMINATED ME ACCUSING ME OF PROMOTING FRAUD. A SALES MANAGER MIKE TESLOW WROTE SOME POLICIES ON CHILDREN OF THE OFFICE STAFF TO GET A BONUS OF $900. I WAS NOT ELIGIBLE FOR BONUSES AS I WAS A HOME OFFICE EMPLOYEE ON A SALARY. THERE WAS A NASD INVESTIGATION AND I WAS CLEARED. THEN PRUDENTIAL REMOVED THE FRAUD AND SAID I WAS TERMINATED FOR WRITING BUSINESS WITH OTHER COMPANIES AND DIRECTION OF MANAGEMENT DUTIES.

End of Report

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