IAPD Report

Gary A. Vestal

CRD# 1707075

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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

Gary A. Vestal (CRD# 1707075)

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 **05/21/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	EDWARD JONES	CRD# 250	08/17/1993
IA	EDWARD JONES	CRD# 250	06/20/2008

QUALIFICATIONS

This representative is currently registered in **4** SRO(s) and **24** 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

No information reported.

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
Customer Dispute	5

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 **24** jurisdiction(s) and 4 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **EDWARD JONES**

Main Address: 12555 MANCHESTER RD
ST. LOUIS, MO 63131

Firm ID#: 250

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	08/17/1993
B	NYSE American LLC	General Securities Representative	Approved	09/13/2011
B	Nasdaq Stock Market	General Securities Representative	Approved	07/12/2006
B	New York Stock Exchange	General Securities Representative	Approved	08/17/1993
B	Alabama	Agent	Approved	11/09/2005
B	Arkansas	Agent	Approved	04/04/2008
B	California	Agent	Approved	05/26/2000
B	Colorado	Agent	Approved	07/27/2021
B	Florida	Agent	Approved	12/06/2001
B	Georgia	Agent	Approved	09/18/2015
B	Illinois	Agent	Approved	05/25/2006
B	Kansas	Agent	Approved	10/18/2007
B	Louisiana	Agent	Approved	07/28/2008

Qualifications

	Regulator	Registration	Status	Date
B	Maine	Agent	Approved	11/04/1997
B	Massachusetts	Agent	Approved	09/04/2014
B	Michigan	Agent	Approved	02/02/2018
B	Mississippi	Agent	Approved	02/02/2006
B	Missouri	Agent	Approved	12/09/1999
B	New Mexico	Agent	Approved	10/16/2018
B	North Carolina	Agent	Approved	10/04/2017
B	Oklahoma	Agent	Approved	08/15/2007
B	South Carolina	Agent	Approved	02/02/2022
B	South Dakota	Agent	Approved	07/27/2010
B	Tennessee	Agent	Approved	09/22/2023
B	Texas	Agent	Approved	09/09/1993
IA	Texas	Investment Adviser Representative	Approved	06/20/2008
B	Virginia	Agent	Approved	02/12/2008
B	Washington	Agent	Approved	08/14/2025
B	Wisconsin	Agent	Approved	06/29/2011

Branch Office Locations

EDWARD JONES
1036 TITUS ST
Gilmer, TX 75644

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 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
	No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	General Securities Representative Examination (S7)	Series 7	08/16/1993

State Securities Law Exams

	Exam	Category	Date
IA B	Uniform Combined State Law Examination (S66)	Series 66	06/16/2008
B	Uniform Securities Agent State Law Examination (S63)	Series 63	08/20/1993

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:

No information reported.

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
08/1992 - Present	EDWARD D. JONES & CO., L.P.	NOT PROVIDED	Y	GILMER, TX, United States
09/1987 - Present	SAN HOUSTON STATE UNIVERSITY	STUDENT - Student	N	HUNTSVILLE, TX, 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.

Rental Property
Rental Property
GILMER, TX
Start date: 11/1/2024
Financial Advisor
Hours per week:
Hours during trading:
Maintain property

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
Customer Dispute	5

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:	EDWARD JONES
Allegations:	THE CLIENT ALLEGED THAT THERE WERE UNAUTHORIZED TRADES THAT TOOK PLACE IN HIS IRA ACCOUNT AND FUNDS WERE DISTRIBUTED WITHOUT HIS AUTHORIZATION. THE CLIENT STATED THAT HE ROLLED OVER $48,573.40 FROM STERLING TRUST IN 2008 AND AUTHORIZED ONLY ONE DISTRIBUTION OF $8,000.00 FROM THE ACCOUNT IN SEPTEMBER OF 2008. WHEN HE CHECKED ON THE BALANCE IN THE ACCOUNT RECENTLY, HE WAS ADVISED THAT IT WAS WORTH APPROXIMATELY $6,000.00 IN APPLE STOCK. THE CLIENT WANTS TO KNOW ABOUT THE REST OF HIS INVESTMENTS AND HOW THE FUNDS WERE ABLE TO LEAVE HIS ACCOUNT WITHOUT HIS AUTHORIZATION.
Product Type:	Mutual Fund
Alleged Damages:	$5,000.00
Alleged Damages Amount Explanation (if amount not exact):	ALLEGATIONS CLAIM DAMAGES THAT APPEAR TO BE IN EXCESS OF $5000.00
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	No

Customer Complaint Information

Date Complaint Received:	07/18/2011
Complaint Pending?	No
Status:	Settled
Status Date:	10/27/2011
Settlement Amount:	$54,111.08
Individual Contribution Amount:	$0.00
Broker Statement	HE COMPLAINT WAS CLOSED BASED ON A LETTER SENT TO THE CLIENT SEVERAL WEEKS AGO REQUESTING A COPY OF THE DIVORCE DECREE ISSUED BY THE COURT. TO DATE THIS DOCUMENT HAS NOT BEEN RECEIVED AND THERE HAS BEEN NO COMMUNICATION BY THE CLIENT OR HIS ATTORNEY. IF THIS INFORMATION IS PROVIDED, WE WILL BE IN A BETTER POSITION TO DETERMINE IF THERE WERE ANY DAMAGES CAUSED BY THESE DISTRIBUTIONS FROM THE CLIENT'S IRA ACCOUNT. COMPLAINT DENIED. UPDATE: 10/27/11 THE DIVORCE DECREE WAS RECEIVED FROM THE CLIENT'S ATTORNEY AND A SETTLEMENT OFFER WAS AGREED TO BY THE CLIENT'S ATTORNEY. THE CLIENT SIGNED THE SETTLEMENT OF CLAIM FORM AND THE CLIENT'S ACCOUNT NUMBER WAS CREDITED FOR $ 54,111.08.

Disclosure 2 of 5

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	EDWARD JONES
Allegations:	05/2003-03/2005; CLIENT STATES SHE ADVISED THE FA SHE JUST WANTED "PRINCIPAL" AND DID NOT WANT TO LOSE HER MONEY AS SHE NEEDED IT TO LIVE ON. CLIENT STATES HER INVESTMENTS HAVE MATURITY DATES IN 2018 AND 2032 AND SHE IS TOO OLD FOR "CALLABLE". CLIENT STATES SHE WILL NOW HAVE A BANK CD IF SHE EVER HAS ANY MONEY AGAIN. APPROXIMATE LOSSES ARE $39,684.40 - FILING REQUIRED.
Product Type:	Other: MISCELLANEOUS
Alleged Damages:	$5,000.00
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	No

Customer Complaint Information

Date Complaint Received:	05/19/2009
Complaint Pending?	No
Status:	Denied
Status Date:	07/01/2009
Settlement Amount:	

Individual Contribution Amount:	
Broker Statement	ALTHOUGH THE CLIENT HAS PROVIDED MATURITY DATES OF INVESTMENTS HELD IN HER ACCOUNT, SHE DID NOT REFERENCE SPECIFIC INVESTMENTS. HOWEVER, IN REVIEWING 2008 ACCOUNT ACTIVITY, IT APPEARS SHE IS REFERRING TO THE FOLLOWING INVESTMENTS: 1) GENERAL MOTORS ACCEPTANCE CORP SMARTNOTES (6.7%, DUE 6/15/2008), 2) FEDERAL NATL MTG ASSN REMIC (5.5%, DUE 12/25/2032), AND FORD MOTOR CREDIT COMPANY (7.6%, DUE 3/1/2032). ACCORDING TO OUR RECORDS, THESE INVESTMENTS WERE PURCHASED SEVERAL YEARS AGO. AT THE TIME OF THE PURCHASES, THE CLIENT WOULD HAVE RECEIVED TRADE CONFIRMATIONS DETAILING THE TRANSACTIONS (INCLUDING MATURITY DATE). ACCORDING TO THE FA, WHILE HE WAS SERVING THE CLIENT'S INVESTMENT NEEDS, SHE WAS FOCUSED ON LONG TERM, HIGH INCOME INVESTMENTS. IN ADDITION, OUR RECORDS REFLECT A LOAN WAS ORIGINATED IN THE ACCOUNT IN MAY 2001. SINCE THE ACCOUNT WAS ESTABLISHED, THE CLIENT HAS RECEIVED ACCOUNT STATEMENTS WHICH PROVIDE INFORMATION REGARDING THE INVESTMENTS HELD IN THE ACCOUNT AS WELL AS REFLECTING ALL ACCOUNT (INCLUDING LOAN) ACTIVITY. BASED ON OUR REVIEW, IT IS OUR OPINION ALL TRANSACTIONS EFFECTED IN THE ACCOUNT WERE COMPLETED WITH THE CLIENT'S KNOWLEDGE AND AUTHORIZATION. IN ADDITION, THE FA HAS INDICATED HE REVIEWED THE ACCOUNT WITH THE CLIENT (TO INCLUDE LOAN ACTIVITY) ON A REGULAR BASIS. FURTHER, IT APPEARS THE CLIENT WAS AWARE OF THE MATURITY DATES OF THE INVESTMENTS THROUGH RECEIPT OF TRADE CONFIRMATIONS AND ACCOUNT STATEMENTS IN ADDITION TO ANY INFORMATION PROVIDED BY THE FA. WE CERTAINLY UNDERSTAND THE CLIENT'S CONCERN RELATED TO THE DECLINE IN THE VALUE OF THE INVESTMENTS; HOWEVER, MARKET FLUCTUATION IS A RISK ASSOCIATED WITH INVESTING. UNFORTUNATELY, WE HAVE ALSO BEEN EXPERIENCING UNPRECEDENTED MARKET CONDITIONS WHICH HAVE HAD A SIGNIFICANT IMPACT ON VALUATIONS.

Disclosure 3 of 5

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	EDWARD JONES
Allegations:	8/21/08-11/9/08; CLIENTS STATE THEY MET WITH THE FA AUGUST 21 AND WANTED TO TRANSFER THEIR ACCOUNTS INTO OUR FIRM. THEY STATE THEY TOLD THE FA TO PUT THEIR MONIES IN GOVERNMENT BONDS AFTER THE TRANSFER IN WAS COMPLETE. CLIENTS STATE THEY RECEIVED THEIR OCTOBER STATEMENT AND SAW THEIR INSTRUCTIONS HAD NOT BEEN FOLLOWED AND HAVE LOST OVER $10,000.
Product Type:	Other
Alleged Damages:	$5,000.00

Customer Complaint Information

Date Complaint Received:	11/20/2008
Complaint Pending?	No
Status:	Denied

Status Date:	12/03/2008
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	FA HAS INDICATED WHEN HE AND THE CLIENTS MET IN AUGUST; THEY DISCUSSED THE INVESTMENTS THAT THE CLIENTS CURRENTLY OWNED AS WELL AS OTHER INVESTMENT CHOICES THAT OUR FIRM OFFERED. IT IS OUR UNDERSTANDING DURING THIS MEETING, THE CLIENTS DECIDED TO OPEN ACCOUNTS WITH OUR FIRM AND AT THAT TIME, THE FA INFORMED THE CLIENTS THAT THEY COULD HAVE THE ASSETS LIQUIDATED AT THEIR THEN CURRENT FIRM AND HAVE THE MONIES TRANSFERRED TO OUR FIRM. THE FA CONTENDS THE CLIENTS INFORMED HIM THEY WANTED TO TRANSFER THE ASSETS IN KIND AND TO SELL THEM AT A LATER DATE. OUR RECORDS REFLECT THE ASSETS IN THE WIFE'S IRA AS WELL AS IN THEIR JOINT ACCOUNT WERE RECEIVED ON AUGUST 28, 2008 FROM WELLS FARGO AND THE ASSETS IN HUSBAND'S IRA WERE RECEIVED ON SEPTEMBER 9, 2008 FROM CHARLES SCHWAB. THE CLIENTS INDICATE THAT THEY RECEIVED THEIR OCTOBER STATEMENT AND CONTACTED THE FA QUESTIONING WHY THE ASSETS HAD NOT BEEN SOLD AND REINVESTED INTO GOVERNMENT BONDS. OUR FIRM DOES NOT ALLOW FOR DISCRETIONARY TRADING AND THE FA HAS STATED HE INFORMED THE CLIENTS THAT HE COULD NOT SELL THE EXISTING SECURITIES AND MAKE THE PURCHASES PREVIOUSLY DISCUSSED BECAUSE THE CLIENTS HAD NOT GIVEN HIM THE AUTHORIZATION. IN ADDITION TO THE OCTOBER STATEMENTS THE CLIENTS RECEIVED, OUR RECORDS REFLECT THE CLIENTS WERE SENT STATEMENTS ON THE WIFE'S IRA ACCOUNT AND THEIR JOINT ACCOUNT IN AUGUST AND SEPTEMBER, AND A STATEMENT IN SEPTEMBER FOR THE HUSBAND'S IRA ACCOUNT WHICH REFLECTED THE TRANSFERS AS WELL AS THE CURRENT HOLDINGS. IN CLOSING, WE HAVE NO REASON TO BELIEVE THE FA DID NOT HANDLE THE TRANSACTION INAPPROPRIATELY AND BELIEVE THAT THE CLIENT WAS AWARE OF THE ASSETS IN THEIR ACCOUNTS BASED ON THE STATEMENTS THAT WERE SENT.

Disclosure 4 of 5

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	EDWARD JONES
Allegations:	CLIENTS LASALLE CD WAS REDEEMED ON 4/14/99. CLIENTS STATES THEY INSTRUCTED THE IR TO "TURN IT OVER FOR A YEAR" THE PROCEEDS FROM THE CD WERE USED TO PURCHASE A CITICORP NOTE,FNMA, JP MORGAN NOTE, PREOVIDENT BANK CD AND SMART. THE CLIENT STATES THESE PURCHASES WERE MADE WIHTOUT HIS AUHTORIZATION.
Product Type:	CD
Alleged Damages:	$5,000.00
Alleged Damages Amount Explanation (if amount not exact):	ALLEGATIONS CLAIM DAMAGES THAT APPEAR TO BE IN EXCESS OF $5000.
Is this an oral complaint?	No
Is this a written complaint?	Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 12/17/1999

Complaint Pending? No

Status: Denied

Status Date: 12/27/1999

Settlement Amount:

Individual Contribution Amount:

Broker Statement THE CD, PURCHASED IN 1997, HAD A MATURITY DATE OF 15 YEARS BUT WAS CALLED IN TWO YEARS. THE PROCEEDS WERE INVESTED IN A SECURITY WITH A SIMILAR MATURITY. THE IR STATES HE NEVER SPOKE WITH THE CLIENT ABOUT ONE YEAR INVESTMENTS. EVERY INVESTMENT PURCHASED SINCE 1997 HAVE HAD MATURITY DATES LONGER THAN ONE YEAR. THE IR STATES THAT ALL OF THE INVESTMENTS WERE MADE WITH THE CLIENTS AUTHORIZATION AND THAT HE DID DISCLOSE THE FEATURES OF THE INVESTMENTS INCLUDING MATURITY DATES. CLAIM DENIED

Disclosure 5 of 5

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: EDWARD D. JONES AND CO., LP

Allegations: CUSTOMER CLAIMS HE INSTRUCTED IR EMPLOYED BY
EDWARD JONES TO PLACE $50,000.00 IN A FIXED ACCOUNT AND
$35,000.00 INTO A MUTUAL ACCOUNT FUND. STATES THAT IR
INITIALLY FOLLOWED HIS INSTRUCTIONS BUT THEN OVER TIME MOVED
THE FIXED ACCOUNT INTO THE MUTUAL FUND. CLAIMS HE DID NOT
AUTHORIZE THE ADDITIONAL FUND PURCHASES AND REQUESTS THE
FIXED
ACCOUNT BE REINSTATED WITH INTEREST. THE ALLEGED
COMPENSATORY
AMOUNT IS: $9,177.77.

Product Type: Mutual Fund

Alleged Damages: $9,177.77

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 08/21/1998

Complaint Pending? No

Status: Denied

Status Date:	09/03/1998
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	CUSTOMER WAS PROVIDED WITH A COPY OF AN APPLICATION FORM HE SIGNED WHICH AUTHORIZED THE DOLLAR COST AVERAGING FROM THE FIXED ACCOUNT TO THE MUTUAL FUND SUB-ACCOUNT IN THE ANNUITY. THE IR ALSO CLAIMS HE HAD FREQUENT CONVERSATIONS WITH CUSTOMER CONCERNING THE TRANSFERS AND THE CUSTOMER RECEIVED MONTHLY STATEMENTS WHICH DETAILED THE TRANSFERS. CLAIM DENIED. NOT PROVIDED.

End of Report

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