IAPD Report

ROBERT JOSEPH BARTOLOTTA

CRD# 1943239

Section Title | Page(s)

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 JOSEPH BARTOLOTTA (CRD# 1943239)

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 **01/20/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	NOVEM GROUP	CRD# 158964	03/20/2012
B	OSAIC WEALTH, INC.	CRD# 23131	10/11/2024
IA	OSAIC WEALTH, INC.	CRD# 23131	10/11/2024

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **52** 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	AMERICAN PORTFOLIOS ADVISORS, INC	112697	HOLBROOK, NY	01/17/2007 - 10/11/2024
B	AMERICAN PORTFOLIOS FINANCIAL SERVICES, INC.	18487	ROCHESTER, NY	09/05/2001 - 10/11/2024
B	NATHAN & LEWIS SECURITIES, INC.	8503	NEW YORK, NY	05/16/1996 - 09/13/2001

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	4
Termination	1

Report Summary

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 **52** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **NOVEM GROUP**

Main Address: 350 LINDEN OAKS
SUITE 140
ROCHESTER, NY 14625

Firm ID#: 158964

	Regulator	Registration	Status	Date
IA	California	Investment Adviser Representative	Approved	01/21/2025
IA	Colorado	Investment Adviser Representative	Approved	01/21/2025
IA	District of Columbia	Investment Adviser Representative	Approved	02/14/2025
IA	Florida	Investment Adviser Representative	Approved	12/20/2019
IA	Georgia	Investment Adviser Representative	Approved	01/21/2025
IA	Illinois	Investment Adviser Representative	Approved	06/15/2026
IA	Iowa	Investment Adviser Representative	Approved	01/21/2025
IA	Kansas	Investment Adviser Representative	Approved	01/17/2025
IA	Maine	Investment Adviser Representative	Approved	01/21/2025
IA	Maryland	Investment Adviser Representative	Approved	02/04/2025
IA	Michigan	Investment Adviser Representative	Approved	01/21/2025
IA	Nebraska	Investment Adviser Representative	Approved	01/17/2025
IA	New Hampshire	Investment Adviser Representative	Approved	01/24/2025

Qualifications

	Regulator	Registration	Status	Date
IA	New Jersey	Investment Adviser Representative	Approved	01/21/2025
IA	New York	Investment Adviser Representative	Approved	10/22/2021
IA	North Dakota	Investment Adviser Representative	Approved	01/22/2025
IA	Ohio	Investment Adviser Representative	Approved	01/31/2025
IA	Pennsylvania	Investment Adviser Representative	Approved	10/24/2019
IA	South Carolina	Investment Adviser Representative	Approved	01/21/2025
IA	Texas	Investment Adviser Representative	Restricted Approval	01/18/2025
IA	Vermont	Investment Adviser Representative	Approved	01/21/2025
IA	Washington	Investment Adviser Representative	Approved	01/22/2025

Branch Office Locations

NOVEM GROUP
350 LINDEN OAKS
SUITE 140
ROCHESTER, NY 14625

NOVEM GROUP
601 Heritage Drive
Suite 220
Jupiter, FL 33458

Employment 2 of 2

Firm Name: **OSAIC WEALTH, INC.**

Main Address: 18700 N. HAYDEN ROAD
SUITE 255
SCOTTSDALE, AZ 85255

Firm ID#: 23131

	Regulator	Registration	Status	Date
B	FINRA	Corporate Securities Represent	Approved	10/11/2024
B	FINRA	Direct Participation Programs	Approved	10/11/2024
B	FINRA	General Securities Principal	Approved	10/11/2024

Qualifications

	Regulator	Registration	Status	Date
B	FINRA	Government Securities Representative	Approved	10/11/2024
B	FINRA	Invest. Co and Variable Contracts	Approved	10/11/2024
B	FINRA	Investment Co./Variable Contracts Prin	Approved	10/11/2024
B	FINRA	Limited Representative-Prvt Scrts Ofrngs	Approved	10/11/2024
B	FINRA	Municipal Fund	Approved	10/11/2024
B	FINRA	Municipal Securities Representative	Approved	10/11/2024
B	FINRA	Private Securities Offerings Principal	Approved	10/11/2024
B	Alabama	Agent	Approved	10/11/2024
B	Alaska	Agent	Approved	10/11/2024
B	Arizona	Agent	Approved	10/11/2024
B	Arkansas	Agent	Approved	10/11/2024
B	California	Agent	Approved	10/11/2024
IA	California	Investment Adviser Representative	Approved	10/11/2024
B	Colorado	Agent	Approved	10/11/2024
B	Connecticut	Agent	Approved	10/11/2024
IA	Connecticut	Investment Adviser Representative	Approved	10/11/2024
B	Delaware	Agent	Approved	10/11/2024
B	District of Columbia	Agent	Approved	10/11/2024
B	Florida	Agent	Approved	10/11/2024

Qualifications

	Regulator	Registration	Status	Date
IA	Florida	Investment Adviser Representative	Approved	05/22/2025
B	Georgia	Agent	Approved	10/11/2024
B	Hawaii	Agent	Approved	10/11/2024
IA	Hawaii	Investment Adviser Representative	Approved	10/11/2024
B	Idaho	Agent	Approved	10/11/2024
B	Illinois	Agent	Approved	10/11/2024
B	Indiana	Agent	Approved	10/11/2024
B	Iowa	Agent	Approved	10/11/2024
B	Kansas	Agent	Approved	10/11/2024
B	Kentucky	Agent	Approved	10/11/2024
B	Louisiana	Agent	Approved	10/11/2024
B	Maine	Agent	Approved	10/11/2024
B	Maryland	Agent	Approved	10/11/2024
B	Massachusetts	Agent	Approved	10/11/2024
IA	Massachusetts	Investment Adviser Representative	Approved	03/13/2025
B	Michigan	Agent	Approved	10/11/2024
IA	Michigan	Investment Adviser Representative	Approved	10/11/2024
B	Minnesota	Agent	Approved	10/11/2024
B	Mississippi	Agent	Approved	10/11/2024

Qualifications

	Regulator	Registration	Status	Date
B	Missouri	Agent	Approved	10/11/2024
B	Montana	Agent	Approved	10/11/2024
B	Nebraska	Agent	Approved	10/11/2024
B	Nevada	Agent	Approved	10/11/2024
B	New Hampshire	Agent	Approved	10/11/2024
B	New Jersey	Agent	Approved	10/11/2024
B	New Mexico	Agent	Approved	10/11/2024
IA	New Mexico	Investment Adviser Representative	Approved	10/11/2024
B	New York	Agent	Approved	10/11/2024
IA	New York	Investment Adviser Representative	Approved	10/11/2024
B	North Carolina	Agent	Approved	10/11/2024
IA	North Carolina	Investment Adviser Representative	Approved	10/11/2024
B	North Dakota	Agent	Approved	10/11/2024
IA	North Dakota	Investment Adviser Representative	Approved	10/11/2024
B	Ohio	Agent	Approved	10/11/2024
B	Oklahoma	Agent	Approved	10/11/2024
B	Oregon	Agent	Approved	10/11/2024
B	Pennsylvania	Agent	Approved	10/11/2024

Qualifications

	Regulator	Registration	Status	Date
IA	Pennsylvania	Investment Adviser Representative	Approved	10/11/2024
B	Puerto Rico	Agent	Approved	11/12/2024
B	Rhode Island	Agent	Approved	10/11/2024
IA	Rhode Island	Investment Adviser Representative	Approved	10/11/2024
B	South Carolina	Agent	Approved	10/11/2024
IA	South Carolina	Investment Adviser Representative	Approved	10/11/2024
B	South Dakota	Agent	Approved	10/11/2024
B	Tennessee	Agent	Approved	10/11/2024
B	Texas	Agent	Approved	10/11/2024
IA	Texas	Investment Adviser Representative	Restricted Approval	02/24/2025
B	Utah	Agent	Approved	10/11/2024
B	Vermont	Agent	Approved	10/11/2024
IA	Vermont	Investment Adviser Representative	Approved	10/11/2024
B	Virginia	Agent	Approved	10/11/2024
IA	Virginia	Investment Adviser Representative	Approved	10/11/2024
B	Washington	Agent	Approved	10/11/2024
B	West Virginia	Agent	Approved	10/11/2024
IA	West Virginia	Investment Adviser Representative	Approved	10/11/2024

Qualifications

	Regulator	Registration	Status	Date
B	Wisconsin	Agent	Approved	10/11/2024
B	Wyoming	Agent	Approved	10/11/2024

Branch Office Locations

OSAIC WEALTH, INC.
601 Heritage Drive
Suite 220
Jupiter, FL 33458

OSAIC WEALTH, INC.
350 LINDEN OAKS
SUITE 140
ROCHESTER, NY 14625

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 3 principal/supervisory exams, 7 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
B	Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	01/02/2023
B	Municipal Fund Securities Principal Examination (S51)	Series 51	03/29/2004
B	General Securities Principal Examination (S24)	Series 24	03/27/2002

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	Limited Representative-Private Securities Offerings (S82)	Series 82	04/13/2010
B	Direct Participation Programs Representative Examination (S22)	Series 22	04/01/2010
B	Government Securities Representative Examination (S72)	Series 72	04/09/2002
B	Municipal Securities Representative Examination (S52)	Series 52	09/01/2000
B	Corporate Securities Limited Representative Examination (S62)	Series 62	10/19/1999
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	05/15/1989

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	05/25/1999

Qualifications

PASSED INDUSTRY EXAMS

State Securities Law Exams

	Exam	Category	Date
B	Uniform Securities Agent State Law Examination (S63)	Series 63	07/20/1989

PROFESSIONAL DESIGNATIONS

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

No information reported.

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at IARD and NASAA.

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	01/17/2007 - 10/11/2024	AMERICAN PORTFOLIOS ADVISORS, INC	CRD# 112697	HOLBROOK, NY
B	09/05/2001 - 10/11/2024	AMERICAN PORTFOLIOS FINANCIAL SERVICES, INC.	CRD# 18487	ROCHESTER, NY
B	05/16/1996 - 09/13/2001	NATHAN & LEWIS SECURITIES, INC.	CRD# 8503	NEW YORK, NY
B	02/26/1996 - 05/09/1996	MFI INVESTMENTS CORP.	CRD# 2864	BRYAN, OH
B	10/25/1994 - 12/15/1995	VISION INVESTMENT GROUP, INC.	CRD# 28135	
B	01/14/1991 - 01/22/1994	NEW ENGLAND SECURITIES	CRD# 615	NEW YORK, NY
B	06/15/1989 - 10/10/1990	MONARCH SECURITIES, INC.	CRD# 2809	

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
10/2024 - Present	OSAIC WEALTH, INC.	Mass Transfer	Y	SCOTTSDALE, AZ, United States
03/2012 - Present	NOVEM GROUP	INVESTMENT ADVISER REPRESENTATIVE	Y	ROCHESTER, NY, United States
01/1994 - Present	ROBERT BARTOLOTTA DBA	OTHER - INSURANCE SALES	N	ROCHESTER, NY, United States
10/1992 - Present	SELF EMPLOYED	AGENT - AGENT	N	ROCHESTER, NY, United States
10/2024 - 10/2024	OSAIC WEALTH, INC.	Mass Transfer	Y	SCOTTSDALE, AZ, United States
01/2007 - 10/2024	AMERICAN PORTFOLIOS ADVISORS, INC.	INVESTMENT ADVISER REPRESENTATIVE	Y	HOLBROOK, NY, United States
09/2001 - 10/2024	AMERICAN PORTFOLIOS FINANCIAL SERVICES	REGISTERED PRINCIPAL & REGISTERED REPRESENTATIVE	Y	HOLBROOK, NY, United States

Registration & Employment History

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.

1) OSAIC WEALTH, INC. - BROKER/DEALER, INVESTMENT-RELATED, REGISTERED PRINCIPAL AND REGISTERED REPRESENTATIVE, START DATE 10/2024, 10 HRS/MONTH TOTAL, 10 HRS/MONTH DURING MARKET HRS

2) OSAIC WEALTH, INC. - RIA, INVESTMENT-RELATED, INVESTMENT ADVISER REPRESENTATIVE, START DATE 10/2024, 2 HRS/MONTH TOTAL, 2 HRS/MONTH DURING MARKET HRS

3) RENTAL PROPERTIES - NOT INVESTMENT-RELATED, START DATE 5/2019, 4 HRS/MONTH, 0 HRS/MONTH DURING MARKET HRS

4) APFS ROCHESTER
POSITION: INSURANCE AGENT NATURE: INDIVIDUAL INSURANCE SALES INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 1 START DATE: 01/01/1994
ADDRESS: 350 Linden Oaks, suite140, Rochester NY 14625, United States
DESCRIPTION: life insurance recommendations

5) RENTAL PROPERTIES
POSITION: partner NATURE: own two rental properties INVESTMENT RELATED: No NUMBER OF HOURS: 3 SECURITIES TRADING HOURS: 3 START DATE: 03/01/2019
ADDRESS: 350 Linden Oaks, suite140, Rochester NY 14625, United States
DESCRIPTION: rent to tenants

6) NOVEM FOUNDATION
POSITION: BOARD PRESIDENT NATURE: corp non profit INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 0 START DATE: 08/01/2019
ADDRESS: 350 Linden Oaks, suite140, Rochester NY 14625, United States
DESCRIPTION: donate to charities

7) BRIARWOOD OF EASTPOINTE
POSITION: board member NATURE: HOA INVESTMENT RELATED: No NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 0 START DATE: 12/01/2025
ADDRESS: Eastpointe, palm beach gardens FL 33410, United States
DESCRIPTION: help oversee condo community

8) NOVEM GROUP
POSITION: CEO/CCO NATURE: s corp INVESTMENT RELATED: Yes NUMBER OF HOURS: 140 SECURITIES TRADING HOURS: 120 START DATE: 08/01/2011
ADDRESS: 350 Linden Oaks, suite140, Rochester NY 14625, United States
DESCRIPTION: Day to day operations

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	4
Termination	1

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 4

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	NATHAN & LEWIS SECURITIES INC.
Allegations:	CLIENT GENCO ALLEGED THAT ON 7/14/92 A REQUEST FOR A WITHDRAWAL OF $5200 FROM A FIXED INSURANCE POLICY WITHOUT PROPER AUTHORIZATION FROM GENCO.
Product Type:	Other
Other Product Type(s):	FIXED INSURANCE PRODUCT
Alleged Damages:	$5,200.00

Customer Complaint Information

Date Complaint Received:	01/30/1998
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	05/24/1999
Settlement Amount:	
Individual Contribution Amount:	$0.00
Broker Statement	STATE OF NEW YORK INSURANCE DEPARTMENT FOUND BARTOLOTTA TO HAVE COMMITTED NO WRONG DOING AND CHARGES WERE TO BE DISMISSED - CASE #C99-0016-N.

Disclosure 2 of 4

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NEW ENGLAND MUTUAL LIFE INSURANCE CO.

Allegations: ARRANGED FOR PRIVATE SECURITIES TRANSACTIONS IN THE AMOUNT OF $15,000.

Product Type:

Alleged Damages: $15,000.00

Customer Complaint Information

Date Complaint Received: 03/30/1995

Complaint Pending? No

Status: Settled

Status Date:

Settlement Amount: $15,000.00

Individual Contribution Amount: $0.00

Firm Statement CLIENTS WERE REIMBURSED THE $15,000 BY NEW ENGLAND MUTUAL LIFE INSURANCE COMPANY, OUR PARENT COMPANY. THE DANIELS ALLEGED THAT IN JANUARY/FEBRUARY 1993, MR. BARTOLOTTA AND JOHN DENNEE (A FORMER LIFE AGENT OF OUR PARENT COMPANY) RECOMMENDED THAT THEY SURRENDER A NEW ENGLAND ZENITH ACCUMULATOR VARIABLE ANNUITY CONTRACT AND PURCHASE A BOND FOR $15,000 THAT WOULD PAY 10% ANNUAL INTEREST WHICH WAS ISSUED BY TOP LINE NUTRITIONAL PRODUCTS, INC. MR. BARTOLOTTA WAS TERMINATED FROM NEW ENGLAND SECURITIES IN DECEMBER 1993 AS A RESULT OF PREVIOUS CUSTOMER COMPLAINTS ALLEGING PRIVATE SECURITIES TRANSACTIONS. THESE OTHER COMPLAINTS HAVE BEEN REPORTED USING THE U-5 DRP ON 1-14-94 & 2-2-94. NASD DISTRICT OFFICE #8, HAS COMPLETE BACKGROUND AND DOCUMENTS ON ALL CUSTOMERS COMPLAINTS.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NEW ENGLAND MUTUAL LIFE INSURANCE CO.

Allegations: THAT I MADE A RECOMMENDATION OF INVESTING IN A PRIVATE BOND.

Product Type: Other

Other Product Type(s): GOVERMENT BONDS

Alleged Damages: $15,000.00

Customer Complaint Information

Date Complaint Received: 03/30/1995

Complaint Pending?	No
Status:	Settled
Status Date:	08/30/1995
Settlement Amount:	$15,000.00
Individual Contribution Amount:	$0.00
Broker Statement	CLIENTS WERE GIVEN A CASH SETTLEMENT BY NEW ENGLAND LIFE OF $15,000.00 I DID DISCUSS GOVERNMENT BONDS WITH THE [CUSTOMER] AT SOME POINT, HOWEVER DID NOT RECOMMEND THE PRIVATE BOND THEY DISCUSSED. IN FACT, BY THE STATEMENT OF THE CLIENT THEY TRANSACTED AND GAVE A CHECK TO [THIRD PARTY] FOR THIS INVESTMENT. THEY ALSO DEALT WITH HIM AND OTHERS REGARDING QUESTIONS AND PAYMENTS, NEVER ME. I HAVE NO KNOWLEDGE OF THESE TRANSACTIONS OTHER THEN THE [CUSTOMER'S] STATEMENT AND HAD NO INVOLVEMENT IN A SETTLEMENT NOR SHOULD I.

Disclosure 3 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	
Allegations:	ARRANGED FOR PRIVATE SECURITIES TRANSACTIONS.
Product Type:	
Alleged Damages:	

Customer Complaint Information

Date Complaint Received:	09/24/1993
Complaint Pending?	No
Status:	Settled
Status Date:	
Settlement Amount:	
Individual Contribution Amount:	$0.00
Firm Statement	SETTLEMENT ON NOVEMBER 18, 1993. THE [CUSTOMER'S] ALLEGE THAT MR. BARTOLOTTA ARRANGED FOR THE PURCHASE OF PRIVATE SECURITIES. THE MATTER WAS SETTLED ON NOVEMBER 18, 1993. ADDITIONAL DETAILS WILL BE SUPPLIED TO THE APPROPRIATE NASD DISTRICT OFFICE UPON REQUEST.

Reporting Source:	Individual

Employing firm when activities occurred which led to the complaint:	NEW ENGLAND SECURITIES
Allegations:	ARRANGED FOR PRIVATE SECURITIES TRANSATIONS
Product Type:	Other
Other Product Type(s):	UNREGISTERED SECURITY
Alleged Damages:	$30,000.00

Customer Complaint Information

Date Complaint Received:	09/24/1993
Complaint Pending?	No
Status:	Settled
Status Date:	11/18/1993
Settlement Amount:	$30,000.00
Individual Contribution Amount:	$0.00
Broker Statement	NEW ENGLAND SECURITIES SETTLEMENT ON 11/18/93. ADDITIONAL DETAILS WILL BE SUPPLIED TO THE APPROPRIATE NASD DISTRICT OFFICE UPON REQUEST FROM NEW ENGLAND SECURITIES.

Disclosure 4 of 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	NEW ENGLAND SECURITIES
Allegations:	ARRANGED FOR PRIVATE SECURITIES TRANSACTIONS.
Product Type:	
Alleged Damages:	

Customer Complaint Information

Date Complaint Received:	09/24/1993
Complaint Pending?	No
Status:	Settled
Status Date:	06/07/1995
Settlement Amount:	
Individual Contribution Amount:	
Firm Statement	ONE CUSTOMER HAS RECEIVED A SETTLEMENT. RESOLUTION OF THE SECOND COMPLAINT IS PENDING. TERMINATION ON DECEMBER 22, 1993 THE [CUSTOMER'S] ALLEGE THAT MR. BARTOLOTTA ARRANGED FOR THE PURCHASE OF PRIVATE SECURITIES. ADDITIONAL DETAILS WILL BE PROVIDED TO THE APPROPRIATE NASD DISTRICT OFFICE UPON REQUEST.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	NEW ENGLAND SECURITIES
Allegations:	ARRANGED FOR PRIVATE SECURITIES TRANSACTIONS
Product Type:	Other
Other Product Type(s):	UNSUITABLE INVESTMENT-INSURANCE
Alleged Damages:	$15,000.00

Customer Complaint Information

Date Complaint Received:	09/24/1993
Complaint Pending?	No
Status:	Settled
Status Date:	06/07/1995
Settlement Amount:	$15,000.00
Individual Contribution Amount:	$0.00
Broker Statement	NEW ENGLAND SETTLED WITH CUSTOMER WITH NO INVOLVEMENT OF BARTOLOTTA. THE [CUSTOMER'S] ALLEGED THAT BARTOLOTTA PARTICIPATED IN A RECOMMENDATION MADE BY ANOTHER NEW ENGLAND AGENT.

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:	NEW ENGLAND SECURITIES
Termination Type:	Discharged
Termination Date:	12/23/1993
Allegations:	ARRANGED FOR PRIVATE SECURITIES
Product Type:	Other
Other Product Types:	UNREGISTERED SECURITY
Broker Statement	NASD DISTRICT 8 INVESTIGATED TERMINATION AND SAW NO CAUSE FOR FURTHER ACTION, NO FINES OR CENSURES.

End of Report

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