IAPD Report

MARK BERNARD LUBLIN

CRD# 2213912

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

MARK BERNARD LUBLIN (CRD# 2213912)

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 **10/31/2016**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	INTEGRATED ADVISORS NETWORK LLC	CRD# 171991	11/17/2016

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **1** 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	KEYSTONE CAPITAL CORPORATION	10722	WEST NEWTON, MA	08/19/2014 - 10/31/2016
B	KEYSTONE CAPITAL CORPORATION	10722	WEST NEWTON, MA	06/03/2013 - 10/31/2016
B	CANTELLA & CO., INC.	13905	NEWTON, MA	10/06/2004 - 06/07/2013

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	2
Customer Dispute	12
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 **1** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name:	**INTEGRATED ADVISORS NETWORK LLC**
Main Address:	4514 COLE AVE SUITE 600 DALLAS, TX 75205
Firm ID#:	171991

	Regulator	Registration	Status	Date
IA	Massachusetts	Investment Adviser Representative	Approved	11/17/2016

Branch Office Locations

INTEGRATED ADVISORS NETWORK LLC
106 Fordham Road
West Newtown, MA 02465

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	03/27/2003

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/31/2016
B	General Securities Representative Examination (S7)	Series 7	07/31/2002
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	02/21/1992

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	11/08/2012
B	Uniform Securities Agent State Law Examination (S63)	Series 63	10/23/1992

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	08/19/2014 - 10/31/2016	KEYSTONE CAPITAL CORPORATION	CRD# 10722	WEST NEWTON, MA
B	06/03/2013 - 10/31/2016	KEYSTONE CAPITAL CORPORATION	CRD# 10722	WEST NEWTON, MA
B	10/06/2004 - 06/07/2013	CANTELLA & CO., INC.	CRD# 13905	NEWTON, MA
B	01/07/2000 - 09/09/2004	CITIZENS INVESTMENT SERVICES CORP.	CRD# 39550	JOHNSTON, RI
B	02/17/1999 - 01/11/2000	SIGNATOR INVESTORS, INC.	CRD# 468	BOSTON, MA
B	09/05/1997 - 06/03/1998	ESSEX NATIONAL SECURITIES, INC.	CRD# 25454	NAPA, CA
B	02/24/1992 - 07/28/1997	PRUCO SECURITIES CORPORATION	CRD# 5685	NEWARK, NJ
B	02/24/1992 - 12/10/1993	THE PRUDENTIAL INSURANCE COMPANY OF AMERICA	CRD# 680	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
10/2016 - Present	Open Network Financial dba of Integrated Advisors Network	Investment Advisor Representative	Y	Newtown, MA, United States
06/2013 - 10/2016	KEYSTONE CAPITAL CORPORATION	REGISTERED REPRESENTATIVE	Y	SAN DIEGO, CA, 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.

1.OPEN NETWORK FINANCIAL CONSULTING - OFFERS CLIENTS TERM/UNIVERSAL/ WHOLE LIFE INSURANCE, LONG TERM CARE INSURANCE, DISABILITY INCOME INSURANCE & FIXED & IMMEDIATE ANNUITIES - NO VARIABLE LIFE OR INDEXED ANNUITIES . 2. SALE OF FIXED ANNUITIES AND FIXED LIFE INSURANCE. RELATIONSHIP START DATE 01/24/08. 20 HOURS PER MONTH DEVOTED TO THIS, 2 OF WHICH ARE DURING SECURITES TRADING HOURS. I WILL

Registration & Employment History

OTHER BUSINESS ACTIVITIES

BE EVALUATING, SELECTING AND SELLING FIXED ANNUITIES AND FIXED LIFE INSURANCE TO INTERESTED CLIENTS. COMPENSATION IS ON A CASE BY CASE BASIS WITH THE INSURANCE CARRIER.

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	2
Customer Dispute	12
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 2

Reporting Source:	Regulator
Regulatory Action Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Sanction(s) Sought:	Other: CONSENT ORDER CONDITIONAL REGISTRATION SUBJECT TO HEIGHTENED SUPERVISION BY KEYSTONE CAPITAL CORPORATION
Date Initiated:	08/19/2014
Docket/Case Number:	2014-0075
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	CITIZENS INVESTMENT SERVICES CORP. AND CANTELLA & CO., INC.
Product Type:	Annuity-Fixed Annuity-Variable Mutual Fund
Allegations:	LUBLIN HAS BEEN SUBJECT TO MULTIPLE CUSTOMER COMPLAINTS AND OTHER DISCLOSURES.
Current Status:	Final
Resolution:	HEIGHTENED SUPERVISION

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	08/19/2014
Sanctions Ordered:	Other: HEIGHTENED SUPERVISION
If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?	No
(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?	
(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or	

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Reporting Source:	Individual
Regulatory Action Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Sanction(s) Sought:	Other: CONSENT ORDER CONDITIONAL REGISTRATION SUBJECT TO HEIGHTENED SUPERVISION BY KEYSTONE CAPITAL CORPORATION
Date Initiated:	08/19/2014
Docket/Case Number:	2014-0075
Employing firm when activity occurred which led to the regulatory action:	CITIZENS INVESTMENT SERVICES CORP. AND CANTELLA & CO
Product Type:	Annuity-Fixed Annuity-Variable Mutual Fund
Allegations:	LUBLIN HAS BEEN SUBJECT TO MULTIPLE CUSTOMER COMPLAINTS AND OTHER DISCLOSURES.
Current Status:	Final
Resolution:	HEIGHTENED SUPERVISION
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	08/19/2014
Sanctions Ordered:	Other: HEIGHTENED SUPERVISION

Disclosure 2 of 2

Reporting Source:	Regulator

Regulatory Action Initiated By:	MASSACHUSETTS
Sanction(s) Sought:	Undertaking
Other Sanction(s) Sought:	
Date Initiated:	02/02/2005
Docket/Case Number:	R-2004-49
Employing firm when activity occurred which led to the regulatory action:	CANTELLA & CO., INC.
Product Type:	Other
Other Product Type(s):	VARIOUS PRODUCTS
Allegations:	LUBLIN HAS BEEN THE SUBJECT OF EIGHT (8) CUSTOMER COMPLAINTS ALLEGING, INTER ALIA, MAKING UNSUITABLE TRADES, MISREPRESENTATION AND OMISSION OF FACTS, WHILE EMPLOYED AT VARIOUS BROKER-DEALERS SINCE 1992, UNTIL HIS TERMINATION FROM CISC ON SEPTEMBER 9, 2004, FOR NOT FOLLOWING COMPANY POLICIES AND PROCEDURES RELATING TO PRE-SIGNED CUSTOMER FORMS. THE NUMBER AND TYPE OF ALLEGATIONS AGAINST LUBLIN SUGGEST A PATTERN OF BEHAVIOR THAT NECESSITATES THAT THE DIVISION PLACE CONDITIONS ON HIS REGISTRATION AS AN AGENT OF CCI.
Current Status:	Final
Resolution:	Consent
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	02/02/2005
Sanctions Ordered:	
Other Sanctions Ordered:	LUBLIN HAS BEEN THE SUBJECT OF EIGHT (8) CUSTOMER COMPLAINTS ALLEGING, INTER ALIA, MAKING UNSUITABLE TRADES, MISREPRESENTATION AND OMISSION OF FACTS, WHILE EMPLOYED AT VARIOUS BROKER-DEALERS SINCE 1992, UNTIL HIS TERMINATION FROM CISC ON SEPTEMBER 9, 2004, FOR NOT FOLLOWING COMPANY POLICIES AND PROCEDURES RELATING TO PRE-SIGNED CUSTOMER FORMS. THE NUMBER AND TYPE OF ALLEGATIONS AGAINST LUBLIN SUGGEST A PATTERN OF BEHAVIOR THAT NECESSITATES THAT THE DIVISION PLACE CONDITIONS ON HIS REGISTRATION AS AN AGENT OF CCI.
Sanction Details:	LUBLIN HAS BEEN THE SUBJECT OF EIGHT (8) CUSTOMER COMPLAINTS ALLEGING, INTER ALIA, MAKING UNSUITABLE TRADES, MISREPRESENTATION AND OMISSION OF FACTS, WHILE EMPLOYED AT VARIOUS BROKER-DEALERS SINCE 1992, UNTIL HIS TERMINATION FROM CISC ON SEPTEMBER 9, 2004, FOR NOT FOLLOWING COMPANY POLICIES AND PROCEDURES RELATING TO PRE-SIGNED CUSTOMER FORMS. THE NUMBER AND TYPE OF ALLEGATIONS AGAINST LUBLIN SUGGEST A PATTERN OF BEHAVIOR THAT NECESSITATES THAT THE DIVISION PLACE CONDITIONS ON HIS REGISTRATION AS AN AGENT OF CCI.

Regulator Statement	LUBLIN HAS BEEN THE SUBJECT OF EIGHT (8) CUSTOMER COMPLAINTS ALLEGING, INTER ALIA, MAKING UNSUITABLE TRADES, MISREPRESENTATION AND OMISSION OF FACTS, WHILE EMPLOYED AT VARIOUS BROKER-DEALERS SINCE 1992, UNTIL HIS TERMINATION FROM CISC ON SEPTEMBER 9, 2004, FOR NOT FOLLOWING COMPANY POLICIES AND PROCEDURES RELATING TO PRE-SIGNED CUSTOMER FORMS. THE NUMBER AND TYPE OF ALLEGATIONS AGAINST LUBLIN SUGGEST A PATTERN OF BEHAVIOR THAT NECESSITATES THAT THE DIVISION PLACE CONDITIONS ON HIS REGISTRATION AS AN AGENT OF CCI.

Reporting Source:	Individual
Regulatory Action Initiated By:	MASSACHUSETTS SECURITIES DIVISION
Sanction(s) Sought:	Undertaking
Other Sanction(s) Sought:	CONSENT DECREE CONDITIONAL REGISTRATION SUBJECT TO SPECIAL SUPERVISION BY CANTELLA & CO., INC.
Date Initiated:	02/02/2005
Docket/Case Number:	R-2004-49
Employing firm when activity occurred which led to the regulatory action:	CITIZENS SECURITIES CORP.
Product Type:	Annuity(ies) - Fixed
Other Product Type(s):	
Allegations:	HISTORY OF CUSTOMER COMPLAINTS
Current Status:	Final
Resolution:	Consent
Resolution Date:	02/02/2005
Sanctions Ordered:	Censure
Other Sanctions Ordered:	SPECIAL SUPERVISORY PROCEDURES PLACED OVER MR. LUBLIN'S ACTIVITIES.
Sanction Details:	THERE WERE NO SUSPENSIONS OR MONETARY PENALTIES ASSESSED NOR WAS MR. LUBLIN'S LICENSE SUSPENDED OR REVOKED, NOR WAS THERE ANY RESTITUTION MANDATED.
Broker Statement	FORM U6 STATED INCORRECTLY THAT CANTELLA & CO., INC. WAS THE "EMPLOYING FIRM WHEN ACTIVITY OCCURED WHICH LED TO THE REGULATORY ACTION." THIS IS INACCURATE. THE EMPLOYING FIRM WAS CITIZENS SECURITIES CORP.

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 12

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	CCO INVESTMENT SERVICES CORP.
Allegations:	CUSTOMER CLAIMS THAT HE WAS TOLD ON OR AROUND NOVEMBER 17, 2003 THAT THE INTEREST RATE ON HIS INVESTMENT WOULD ALWAYS REFLECT THE PREVAILING CERTIFICATE OF DEPOSIT RATES.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$7,182.00

Customer Complaint Information

Date Complaint Received:	12/20/2005
Complaint Pending?	No
Status:	Settled
Status Date:	03/20/2006
Settlement Amount:	$6,000.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CCO INVESTMENT SERVICES CORP.
Allegations:	CUSTOMER CLAIMS THAT HE WAS TOLD ON OR AROUND NOVEMBER 17, 2003 THAT THE INTEREST RATE ON HIS INVESTMENT WOULD ALWAYS REFLECT THE PREVAILING CERTIFICATE OF DEPOSIT RATES.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$7,182.00

Customer Complaint Information

Date Complaint Received:	12/20/2005
Complaint Pending?	No
Status:	Settled
Status Date:	03/20/2006
Settlement Amount:	$6,000.00

Individual Contribution Amount: $0.00

Disclosure 2 of 12

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: CCO INVESTMENT SERVICES CORP.

Allegations: CUSTOMER ALLEGES SHE WAS MISLED ABOUT THE RATE OF RETURN ON HER INVESTMENT AT THE TIME OF SALE ON 9/4/2003. CUSTOMER ALSO ALLEGES INVESTMENT WAS UNSUITABLE.

Product Type: Annuity(ies) - Variable

Alleged Damages: $7,185.00

Customer Complaint Information

Date Complaint Received: 09/19/2005

Complaint Pending? No

Status: Settled

Status Date: 02/07/2006

Settlement Amount: $6,000.00

Individual Contribution Amount: $0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: CCO INVESTMENT SERVICES CORP.

Allegations: CUSTOMER ALLEGES SHE WAS MISLED ABOUT THE RATE OF RETURN ON HER INVESTMENT AT THE TIME OF SALE ON 09/04/2003 AND ALSO ALLEGES THAT THE INVESTMENT WAS UNSUITABLE.

Product Type: Annuity(ies) - Variable

Alleged Damages: $7,185.00

Customer Complaint Information

Date Complaint Received: 09/19/2005

Complaint Pending? No

Status: Settled

Status Date: 02/07/2006

Settlement Amount: $6,000.00

Individual Contribution Amount: $0.00

Disclosure 3 of 12

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	CLIENT'S ATTORNEY ALLEGES THAT THE PRODUCT PURCHASED IN FEBRUARY OF 2000 WAS UNSUITABLE FOR THE CLIENT.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$357,238.90

Customer Complaint Information

Date Complaint Received:	04/06/2005
Complaint Pending?	No
Status:	Settled
Status Date:	07/05/2005
Settlement Amount:	$125,000.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	UNSUITABLE RECOMMENDATION OF A VARIABLE ANNUITY
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$357,238.90

Customer Complaint Information

Date Complaint Received:	04/06/2005
Complaint Pending?	No
Status:	Settled
Status Date:	07/05/2005
Settlement Amount:	$125,000.00
Individual Contribution Amount:	$0.00

Disclosure 4 of 12

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	CCO INVESTMENT SERVICES CORP.
Allegations:	CLIENT ALLEGES THE VARIABLE ANNUITY PURCHASED IN 2000 WAS UNSUITABLE.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$12,961.33

Customer Complaint Information

Date Complaint Received: 03/21/2005

Complaint Pending? No

Status: Settled

Status Date: 09/21/2005

Settlement Amount: $5,433.94

Individual Contribution Amount: $0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: CITIZENS INVESTMENT SERVICES CORP.

Allegations: CLIENT ALLEGES THE VARIABLE ANNUITY PURCHASED IN 2000 WAS UNSUITABLE.

Product Type: Annuity(ies) - Variable

Alleged Damages: $12,961.33

Customer Complaint Information

Date Complaint Received: 03/21/2005

Complaint Pending? No

Status: Settled

Status Date: 09/21/2005

Settlement Amount: $5,433.94

Individual Contribution Amount: $0.00

Disclosure 5 of 12

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: CITIZENS INVSESTMENT SERVICES CORP.

Allegations: CLIENT'S ATTORNEY ALLEGES THAT THE NATURE OF THE PRODUCT AND THE ASSOCIATED FEES WERE NOT DISCLOSED TO THE CLIENT. CISC HAS INVESTIGATED THE ALLEGATIONS AND FOUND THEM WITHOUT MERIT.

Product Type: Annuity(ies) - Variable

Alleged Damages: $10,046.22

Customer Complaint Information

Date Complaint Received: 10/25/2004

Complaint Pending? No

Status: Denied

Status Date: 11/17/2004

Settlement Amount:	$0.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS BANK
Allegations:	CLIENT'S ATTORNEY ALLEGES THAT THE NATURE OF THE PRODUCT AND THE ASSOCIATED FEES WERE NOT DISCLOSED TO THE CLIENT. CISC HAS INVESTIGATED THE ALLEGATIONS AND FOUND THEM WITHOUT MERIT.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$10,046.22

Customer Complaint Information

Date Complaint Received:	10/25/2004
Complaint Pending?	No
Status:	Denied
Status Date:	11/17/2004
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 6 of 12

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	CUSTOMERS ALLEGE THAT THEY WERE UNAWARE OF ANY SALES CHARGES OR FEES ASSOCIATED WITH THIS ACCOUNT AND WERE UNHAPPY WITH THE PERFORMANCE OF THE FUND.
Product Type:	Mutual Fund(s)
Alleged Damages:	$95,307.34

Customer Complaint Information

Date Complaint Received:	11/19/2002
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	09/01/2004
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	AN OFFER TO SETTLE THIS MATTER WAS MADE TO THE CLIENT ON FEBRUARY 11, 2003. AS OF TODAY'S DATE, NO RESPONSE HAS BEEN

RECEIVED FROM THE CLIENT.

Disclosure 7 of 12

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	CUSTOMER ALLEGES THAT INVESTMENT WAS NOT SUITABLE BASED ON FINANCIAL GOALS.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$77,281.50

Customer Complaint Information

Date Complaint Received:	11/27/2000
Complaint Pending?	No
Status:	Denied
Status Date:	12/20/2000
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 8 of 12

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	CUSTOMER ALLEGES HE WAS NOT SUITABLE BASED ON THE FLUCTUATION OF ACCOUNT VALUE.
Product Type:	Annuity(ies) - Variable
Alleged Damages:	$10,000.00

Customer Complaint Information

Date Complaint Received:	04/19/2001
Complaint Pending?	No
Status:	Closed/No Action
Status Date:	07/10/2001
Settlement Amount:	
Individual Contribution Amount:	

Disclosure 9 of 12

Reporting Source:	Firm

Employing firm when activities occurred which led to the complaint:	CCO INVESTMENT SERVICES CORP.
Allegations:	CLIENT ALLEGES THAT INVESTMENT CHOSEN WAS MISREPRESENTED AS BEING "SAFE" AND NOT SUBJECT TO MARKET FLUCTUATION.
Product Type:	Mutual Fund(s)
Alleged Damages:	$17,442.00

Customer Complaint Information

Date Complaint Received:	04/19/2004
Complaint Pending?	No
Status:	Settled
Status Date:	09/20/2005
Settlement Amount:	$19,442.00
Individual Contribution Amount:	$0.00

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	CLIENT ALLEGES THAT THE INVESTMENT CHOSEN WAS MISREPRESENTED AS BEING "SAFE" AND NOT SUBJECT TO MARKET FLUCTUATION.
Product Type:	Mutual Fund(s)
Alleged Damages:	$17,442.00

Customer Complaint Information

Date Complaint Received:	04/21/2004
Complaint Pending?	No
Status:	Settled
Status Date:	09/20/2005
Settlement Amount:	$19,442.00
Individual Contribution Amount:	$0.00

Disclosure 10 of 12

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	CITIZENS INVESTMENT SERVICES CORP.
Allegations:	CLIENT'S ATTORNEY IS ALLEGING THAT THE PRODUCTS PURCHASED ARE NOT SUITABLE.
Product Type:	Annuity(ies) - Variable
Other Product Type(s):	FIXED ANNUITY

Alleged Damages: $30,000.00

Customer Complaint Information

Date Complaint Received: 01/22/2004

Complaint Pending? No

Status: Settled

Status Date: 04/26/2004

Settlement Amount: $9,700.00

Individual Contribution Amount: $0.00

Disclosure 11 of 12

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: CITIZENS INVESTMENT SERVICES CORP.

Allegations: CLIENT ALLEGES PRODUCT WAS MISREPRESENTED TO HIM. THE FIRM IS IN THE PROCESS OF INVESTIGATING THE ALLEGATION.

Product Type: Annuity(ies) - Variable

Alleged Damages: $7,802.22

Customer Complaint Information

Date Complaint Received: 10/16/2003

Complaint Pending? No

Status: Settled

Status Date: 12/15/2003

Settlement Amount: $3,705.44

Individual Contribution Amount: $0.00

Disclosure 12 of 12

Reporting Source: Regulator

Employing firm when activities occurred which led to the complaint: CITIZENS INVESTMENT SERVICES CORP.

Allegations: FORGERY; MISREPRESENTATION; OMISSION OF FACTS; SUITABILITY

Product Type: Annuity(ies) - Variable

Other Product Type(s): UNSPECIFIED VARIABLE ANNUITY

Alleged Damages: $15,000.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD - CASE #02-00020

Date Notice/Process Served: 09/14/2001

Arbitration Pending? No

Disposition: Award

Disposition Date: 01/30/2003

Disposition Detail: CLAIMANTS ARE INSTRUCTED TO SURRENDER THE ANNUITY IN DISPUTE. LUBLIN IS JOINTLY AND SEVERALLY LIABLE AND SHALL PAY TO CLAIMANTS $6,695.19 AS COMPENSATORY DAMAGES FOR THE SURRENDER CHARGE APPLICABLE TO THE ANNUITY IN DISPUTE. RESPONDENT IS JOINTLY AND SEVERALLY LIABLE FOR AND SHALL PAY CLAIMANTS $8,338.11 REPRESENTING INTEREST SINCE THE OPENING OF THE ANNUITY CONTRACT IN DISPUTE.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: CITIZENS INVESTMENT SERVICES CORP.

Allegations: THIS ALLEGATION OF FORGERY WAS MADE BY THE CUSTOMER AND HIS SON 11 MONTHS AFTER THE ESTABLISHMENT OF THE ACCOUNT AND ONE MONTH AFTER THEIR REQUEST TO REVERSE THE INVESTMENT WAS DENIED BY CITIZENS FINANCIAL SERVICES INC. UPON RECEIPT OF THE ADDITIONAL CLAIM OF FORGERY, WHICH I DENY, THE FIRM EMPLOYED THE SERVICES OF AN INDEPENDENT HANDWRITING EXPERT TO REVEW ALL SIGNATURES AND INITIALS IN QUESTION. THE RESULTS OF THAT ANALYSIS STATE THAT ALL SIGNATURES AND INITIALS WERE MADE BY CUSTOMER. AS A RESULT OF THESE FINDINGS THE FIRM ADVISED THE CUSTOMER THAT THE CLAIM WAS MERITLESS AND WOULD THEREFORE BE DENIED.

Product Type: Annuity(ies) - Variable

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 02/05/2001

Complaint Pending? No

Status: Arbitration/Reparation Denied

Status Date: 04/27/2001

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD CASE 02-0020

Date Notice/Process Served: 03/28/2002

Arbitration Pending? No

Disposition: Award to Customer

Disposition Date:	01/30/2003
Monetary Compensation Amount:	$15,033.00
Individual Contribution Amount:	$0.00

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:	Firm
Firm Name:	CITIZENS INVESTMENT SERVICES CORP.
Termination Type:	Discharged
Termination Date:	08/13/2004
Allegations:	SOME COMPLAINTS INCLUDED ALLEGATIONS OF REPRESENTATIVE MAKING UNSUITABLE RECOMMENDATIONS.
Product Type:	Options
Other Product Types:	
Firm Statement	A REVIEW WAS CONDUCTED AS A RESULT OF A NUMBER OF CUSTOMER COMPLAINTS. ALL COMPLAINTS HAVE BEEN THOROUGHLY INVESTIGATED AND HANDLED BY CISC. UPON CONCLUSION OF THE REVIEW, THE REPRESENTATIVE WAS TERMINATED FOR FAILURE TO FOLLOW COMPANY POLICIES RELATING TO DOCUMENTATION REQUIREMENTS IN CLIENT FILES.

Reporting Source:	Individual
Firm Name:	CITIZENS BANK
Termination Type:	Discharged
Termination Date:	09/09/2004
Allegations:	VIOLATION OF COMPANY POLICIES AND PROCEDURES.
Product Type:	No Product
Other Product Types:	

End of Report

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