



## IAPD Report

# TODD CLINTON WIRICK

CRD# 2229990

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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

### TODD CLINTON WIRICK (CRD# 2229990)

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 **06/10/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	FORTUNE FINANCIAL SERVICES, INC.	CRD# 42150	05/14/2015
<b>IA</b>	EXODUS WEALTH, LLC	CRD# 174328	01/06/2020

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **14** 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
<b>IA</b>	PROSPERITY WEALTH MANAGEMENT, INC.	174328	Toledo, OH	09/28/2016 - 12/31/2019
<b>IA</b>	J. W. COLE ADVISORS, INC.	112294	SYLVANIA, OH	02/05/2014 - 04/18/2014
<b>B</b>	J.W. COLE FINANCIAL, INC.	124583	SYLVANIA, OH	04/29/2011 - 04/16/2014

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	3
Customer Dispute	1
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 **14** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

### Employment 1 of 2

Firm Name: **FORTUNE FINANCIAL SERVICES, INC.**  
Main Address: 3582 BROADHEAD ROAD  
SUITE 202  
MONACA, PA 15061  
Firm ID#: 42150

Regulator	Registration	Status	Date
<b>B</b> FINRA	General Securities Representative	Approved	05/14/2015
<b>B</b> FINRA	Invest. Co and Variable Contracts	Approved	05/14/2015
<b>B</b> Alaska	Agent	Approved	03/14/2025
<b>B</b> California	Agent	Approved	08/05/2016
<b>B</b> Florida	Agent	Approved	12/11/2020
<b>B</b> Georgia	Agent	Approved	02/04/2021
<b>B</b> Indiana	Agent	Approved	06/26/2015
<b>B</b> Kentucky	Agent	Approved	09/13/2023
<b>B</b> Maryland	Agent	Approved	09/19/2023
<b>B</b> Michigan	Agent	Approved	02/17/2021
<b>B</b> Nevada	Agent	Approved	09/04/2024
<b>B</b> New York	Agent	Approved	06/07/2024
<b>B</b> Ohio	Agent	Approved	06/15/2015



### Qualifications

Regulator	Registration	Status	Date
<b>B</b> Oregon	Agent	Approved	03/29/2023
<b>B</b> Pennsylvania	Agent	Approved	03/04/2021
<b>B</b> Washington	Agent	Approved	09/25/2024

### Branch Office Locations

5800 Monroe Street  
Building C, Suite 102  
Sylvania, OH 43560

6500 Emerald Parkway  
Suite 100  
Dublin, OH 43016

### Employment 2 of 2

Firm Name: **EXODUS WEALTH, LLC**  
 Main Address: 2400 EAST COMMERCIAL BOULEVARD  
 SUITE 706  
 FORT LAUDERDALE, FL 33308  
 Firm ID#: 174328

Regulator	Registration	Status	Date
<b>IA</b> Ohio	Investment Adviser Representative	Approved	01/06/2020

### Branch Office Locations

**EXODUS WEALTH, LLC**  
5800 Monroe St.  
Building C, Suite 102  
Sylvania, OH 43560



## 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, 3 general industry/product exams, and 1 state securities law exam.**


#### Principal/Supervisory Exams

Exam	Category	Date
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No information reported.


#### General Industry/Product Exams

Exam	Category	Date
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 Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
 General Securities Representative Examination (S7)	Series 7	05/06/1999
 Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	07/17/1992

#### State Securities Law Exams

Exam	Category	Date
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 Uniform Securities Agent State Law Examination (S63)	Series 63	08/18/1995
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### 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	09/28/2016 - 12/31/2019	PROSPERITY WEALTH MANAGEMENT, INC.	CRD# 174328	Toledo, OH
IA	02/05/2014 - 04/18/2014	J. W. COLE ADVISORS, INC.	CRD# 112294	SYLVANIA, OH
B	04/29/2011 - 04/16/2014	J.W. COLE FINANCIAL, INC.	CRD# 124583	SYLVANIA, OH
B	07/20/2009 - 08/13/2010	J.W. COLE FINANCIAL, INC.	CRD# 124583	SYLVANIA, OH
B	04/07/2003 - 03/31/2009	THE O.N. EQUITY SALES COMPANY	CRD# 2936	TOLEDO, OH
B	03/01/1996 - 04/23/2003	MML INVESTORS SERVICES, INC.	CRD# 10409	SPRINGFIELD, MA
B	07/20/1992 - 03/01/1996	G. R. PHELPS & CO., INC.	CRD# 173	

#### 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
09/2016 - Present	Prosperity Wealth Management, Inc.	Investment Adviser Representative	Y	San Ramon, CA, United States
05/2015 - Present	FORTUNE FINANCIAL SERVICES, INC	REGISTERED REPRESENTATIVE	Y	MONACA, PA, United States
10/1991 - Present	CONNECTICUT MUTUAL LIFE INSURANCE CO	AGENT - Agent	N	TOLEDO, OH, 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.

FINANCIAL VISIONS D/B/A AND MARKETING COMPANY, INVESTMENT RELATED,PRESIDENT, OWNER, SOLE SHARE HOLDER,11/01/05-PRESENT,160 HRS PER MONTH,AND INVESTMENT SALES. IAR WITH PROSPERITY WEALTH MANAGEMENT

PAUL & KAREN STRESSEN IRREVOCABLE LIFE INSURANCE TRUST ; INVESTMENT RELATED: NO; ADDRESS: SAME AS



## Registration & Employment History



### OTHER BUSINESS ACTIVITIES

REGISTERED LOCATION ; NATURE OF BUSINESS: TRUST ; START DATE: 09/2023 ; POSITION/TITLE/RELATIONSHIP: TRUSTEE; APX NUMBER OF HOURS - LESS THAN 1/YEAR DESCRIPTION OF DUTIES: TRUSTEE



## 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	3
Customer Dispute	1
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 3

<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	OHIO DEPARTMENT OF INSURANCE
<b>Sanction(s) Sought:</b>	Revocation Suspension
<b>Date Initiated:</b>	03/07/2012
<b>Docket/Case Number:</b>	LGL-0002271-H
<b>Employing firm when activity occurred which led to the regulatory action:</b>	ONESCO
<b>Product Type:</b>	Annuity-Variable
<b>Allegations:</b>	WIRICK EXECUTED CLIENT FORMS WITHOUT PERMISSION EFFECTUATING A VARIABLE ANNUITY TRANSACTION
<b>Current Status:</b>	Final
<b>Resolution:</b>	CONSENT ORDER
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	03/07/2012



**Sanctions Ordered:** Other: SURRENDER FOR CAUSE.

**Sanction 1 of 1**

**Sanction Type:** Bar (Permanent)

**Capacities Affected:** INSURANCE

**Duration:** INDEFINITE

**Start Date:** 03/07/2012

**End Date:**

**Broker Statement** ACTION BASED ON SAME TRANSACTION PREVIOUSLY REVIEWED BY FINRA AND THE OHIO DEPARTMENT OF SECURITIES.

### Disclosure 2 of 3

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** OHIO

**Sanction(s) Sought:** Denial

**Date Initiated:** 08/22/2011

**Docket/Case Number:** DIVISION ORDERS 11-037 AND 12-003

**URL for Regulatory Action:**

**Employing firm when activity occurred which led to the regulatory action:** J.W. COLE FINANCIAL, INC.

**Product Type:** Annuity-Variable

**Allegations:** ALLEGED VIOLATIONS OF R.C. 1707.19(A)(4) AND 1707.19(A)(1)

**Current Status:** Final

**Resolution:** ORDER AND CONSENT AGREEMENT

**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:** 01/30/2012

**Sanctions Ordered:** Suspension  
Other: APPLICANT'S LICENSE WAS APPROVED AND THEN IMMEDIATELY SUSPENDED FOR 60 DAYS. UPON COMPLETION OF THE SUSPENSION, APPLICANT IS SUBJECT TO A 12 MONTH HEIGHTENED SUPERVISION PLAN.

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** SECURITIES SALESPERSON

**Duration:** 60 DAYS

**Start Date:** 01/30/2012



**End Date:** 03/30/2012

**Regulator Statement** AFTER REQUESTING AN ADMINISTRATIVE HEARING BUT BEFORE SUCH HEARING WAS HELD, APPLICANT AND THE DIVISION ENTERED INTO A DIVISION ORDER AND CONSENT AGREEMENT, WHEREBY THE DIVISION WOULD ISSUE A SECURITIES SALESPERSON LICENSE, THE LICENSE WOULD IMMEDIATELY BE SUPSENDED FOR 60 DAYS, AND UPON COMPLETION OF HTE SUSPENSION APPLICANT WOULD BE SUBJECT TO 12 MOS. HEIGHTENED SUPERVISION.

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**Reporting Source:** Individual

**Regulatory Action Initiated By:** OHIO

**Sanction(s) Sought:** Denial

**Date Initiated:** 08/22/2011

**Docket/Case Number:** DIVISION ORDERS 11-037 AND 12-003

**Employing firm when activity occurred which led to the regulatory action:** J.W. COLE FINANCIAL, INC.

**Product Type:** Annuity-Variable

**Allegations:** ALLEGED VIOLATIONS OF R.C. 1707.19(A)(4) AND 1707.19(A)(1)

**Current Status:** Final

**Resolution:** ORDER AND CONSENT AGREEMENT

**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:** 01/30/2012

**Sanctions Ordered:** Suspension  
Other: APPLICANT'S LICENSE WAS APPROVED AND THEN IMMEDIATELY SUSPENDED FOR 60 DAYS. UPON COMPLETION OF THE SUSPENSION, APPLICANT IS SUBJECT TO A 12 MONTH HEIGHTENED SUPERVISION PLAN.

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** SECURITIES SALESPERSON

**Duration:** 60 DAYS

**Start Date:** 01/30/2012

**End Date:** 03/30/2012

**Broker Statement** AFTER REQUESTING AN ADMINISTRATIVE HEARING BUT BEFORE SUCH HEARING WAS HELD, APPLICANT AND THE DIVISION ENTERED INTO A DIVISION ORDER AND CONSENT AGREEMENT, WHEREBY THE DIVISION WOULD ISSUE A SECURITIES SALESPERSON LICENSE, THE LICENSE WOULD IMMEDIATELY BE SUBJECT TO 12 MOS. HEIGHTENED



SUPERVISION.

**Disclosure 3 of 3**

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	07/30/2010
<b>Docket/Case Number:</b>	<a href="#">2009017601101</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	O.N. EQUITY SALES COMPANY
<b>Product Type:</b>	Annuity-Variable
<b>Allegations:</b>	FINRA RULE 2010, INTERPRETATIVE MATERIAL 2310-2(A)(1) - TODD C. WIRICK, WITHOUT THE CUSTOMER'S KNOWLEDGE OR AUTHORIZATION, SIGNED A CUSTOMER'S NAME TO FORMS RELATED TO A VARIABLE ANNUITY EXCHANGE. AS A RESULT OF THE FORGED DOCUMENTS, WIRICK CAUSED \$41,505.57 TO BE TRANSFERRED FROM ONE VARIABLE ANNUITY POLICY TO ANOTHER WITHOUT THE CUSTOMER'S KNOWLEDGE OR CONSENT. THE INSURANCE COMPANY RECEIVING THE FUNDS PAID WIRICK'S MEMBER FIRM \$2,282.80 IN GROSS COMMISSIONS. WHEN THE CUSTOMER RECEIVED A TRANSFER CONFIRMATION REFLECTING THE PURCHASE OF THE VARIABLE ANNUITY, THE CUSTOMER COMPLAINED AND THE TRANSACTION WAS REVERSED; THE COMMISSIONS CHARGED TO THE CUSTOMER'S ACCOUNT FOR THE TRANSFER WERE CANCELLED PURSUANT TO THE NEW VARIABLE ANNUITY'S "FREE LOOK" PROVISIONS.
<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	07/30/2010
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Suspension
<b>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?</b>	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?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	ANY CAPACITY
<b>Duration:</b>	EIGHT MONTHS
<b>Start Date:</b>	08/16/2010



**End Date:** 04/15/2011

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$10,000.00

**Portion Levied against individual:** \$10,000.00

**Payment Plan:**

**Is Payment Plan Current:** No

**Date Paid by individual:** 12/07/2011

**Was any portion of penalty waived?** No

**Amount Waived:**

**Regulator Statement** WITHOUT ADMITTING OR DENYING THE FINDINGS, WIRICK CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED \$10,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR EIGHT MONTHS. THE SUSPENSION IS IN EFFECT FROM AUGUST 16, 2010 THROUGH APRIL 15, 2011. FINE PAID IN FULL DECEMBER 7, 2011.

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**Reporting Source:** Individual

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Date Initiated:** 01/06/2010

**Docket/Case Number:** 20090176011-01

**Employing firm when activity occurred which led to the regulatory action:** ONESCO

**Product Type:** Annuity-Variable

**Allegations:** REP SIGNED CLIENT FORMS WITHOUT PERMISSION EFFECTUATING A VARIABLE ANNUITY TRANSACTION.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** Yes

**Resolution Date:** 08/01/2010

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension



**Sanction 1 of 1**

**Sanction Type:** Suspension  
**Capacities Affected:** ALL CAPACITIES  
**Duration:** 8 MONTHS  
**Start Date:** 08/16/2010  
**End Date:** 04/15/2011

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)  
**Total Amount:** \$10,000.00  
**Portion Levied against individual:** \$10,000.00  
**Payment Plan:** 25% IN TEN BUSINESS DAYS  
**Is Payment Plan Current:** Yes  
**Date Paid by individual:**  
**Was any portion of penalty waived?** No  
**Amount Waived:**

**Broker Statement**

REPRESENTATIVE'S CLIENT HELD A VARIABLE ANNUITY ISSUED BY AIG. IN THE SPRING OF 2009, BASED UPON MOUNTING NEWS REPORTS CONCERNING THE VIABILITY, AND POSSIBLE FAILURE, OF AIG, REPRESENTATIVE BECAME CONCERNED ABOUT THE RISK TO WHICH CLIENT'S INVESTMENT WAS EXPOSED. ACCORDINGLY, REPRESENTATIVE REPEATEDLY ATTEMPTED TO CONTACT CLIENT TO RECOMMEND THE EXCHANGE OF THE AIG VARIABLE ANNUITY FOR ANOTHER ISSUED BY ANOTHER MORE STABLE INSURANCE COMPANY. UNBEKNOWNST TO REPRESENTATIVE, THE CLIENT HAD RECENTLY CHANGED HIS PHONE NUMBER AND REPRESENTATIVE WAS UNABLE TO REACH CLIENT. REPRESENTATIVE SIGNED CLIENT'S NAME TO INITIATE A VARIABLE ANNUITY EXCHANGE. REPRESENTATIVE ACTED IN WHAT HE BELIEVED TO BE THE BEST INTEREST OF CLIENT AND WITHOUT FINANCIAL MOTIVATION, BUT NEVERTHELESS REGRETS HIS DECISION. THE CLIENT WAS NOT ULTIMATELY HARMED AS THE POLICY WAS "FREE-LOOKED.



## 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 1

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	THE O.N. EQUITY SALES COMPANY
<b>Allegations:</b>	ALLEGATIONS INCLUDE CHURNING AND UNAUTHORIZED SALES
<b>Product Type:</b>	Mutual Fund(s)
<b>Alleged Damages:</b>	

## Customer Complaint Information

<b>Date Complaint Received:</b>	10/24/2005
<b>Complaint Pending?</b>	No
<b>Status:</b>	Settled
<b>Status Date:</b>	09/26/2005
<b>Settlement Amount:</b>	\$3,809.52
<b>Individual Contribution Amount:</b>	\$3,809.52



## 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:** THE O.N. EQUITY SALES COMPANY  
**Termination Type:** Discharged  
**Termination Date:** 03/20/2009  
**Allegations:** REPRESENTATIVE INITIATED AN UNAUTHORIZED CLIENT TRANSACTION. PAPERWORK SUBMITTED WITH THE PURPORTED CLIENT SIGNATURES AUTHORIZING THE EXCHANGE, WAS NOT SIGNED BY THE CLIENT.  
**Product Type:** Annuity-Variable

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**Reporting Source:** Individual  
**Firm Name:** THE O.N. EQUITY SALES COMPANY  
**Termination Type:** Discharged  
**Termination Date:** 03/31/2009  
**Allegations:** REPRESENTATIVE INITIATED AN UNAUTHORIZED CLIENT TRANSACTION. PAPERWORK SUBMITTED WITH THE PURPORTED CLIENT SIGNATURES AUTHORIZING THE EXCHANGE WAS NOT SIGNED BY THE CLIENT.  
**Product Type:** Annuity-Variable

**Broker Statement** THE TRANSACTION IN QUESTION WAS INITIALLY AGREED TO BY THE CLIENT. THE TRANSFER WAS INITIATED 3 MONTHS LATER. AFTER COMPLETION OF THE TRANSACTION, THE CLIENT CLAIMED HE DID NOT WANT THE TRANSFER TO OCCUR. TRANSACTION WAS REVERSED AT CLIENTS REQUEST.



## End of Report

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