



## IAPD Report

# GERALDINE GORDON

CRD# 2499098

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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

### GERALDINE GORDON (CRD# 2499098)

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 **02/26/2026**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	AMERIPRISE FINANCIAL SERVICES, LLC	CRD# 6363	12/13/1994
<b>IA</b>	AMERIPRISE FINANCIAL SERVICES, LLC	CRD# 6363	04/14/2004

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **7** 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>B</b>	IDS LIFE INSURANCE COMPANY	6321	MINNEAPOLIS, MN	12/13/1994 - 07/03/2006

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

### DISCLOSURE INFORMATION

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

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

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	8



## 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 7 jurisdiction(s) and 1 SRO(s) through his or her employer(s).

### Employment 1 of 1

Firm Name: **AMERIPRISE FINANCIAL SERVICES, LLC**  
Main Address: 901 3RD AVENUE SOUTH  
MINNEAPOLIS, MN 55402  
Firm ID#: 6363

Regulator	Registration	Status	Date
<b>B</b> FINRA	General Securities Representative	Approved	12/13/1994
<b>B</b> Arizona	Agent	Approved	03/02/2021
<b>B</b> Colorado	Agent	Approved	05/21/2015
<b>B</b> Indiana	Agent	Approved	04/10/2014
<b>B</b> Kentucky	Agent	Approved	12/13/1994
<b>IA</b> Kentucky	Investment Adviser Representative	Approved	04/14/2004
<b>B</b> South Carolina	Agent	Approved	03/24/2020
<b>B</b> Tennessee	Agent	Approved	10/27/2015
<b>B</b> Virginia	Agent	Approved	09/10/2008

### Branch Office Locations

**AMERIPRISE FINANCIAL SERVICES, LLC**  
3805 Wyndsong Trail  
Lexington, KY 40514

**AMERIPRISE FINANCIAL SERVICES, LLC**  
Lexington, KY

**AMERIPRISE FINANCIAL SERVICES, LLC**  
Tucson, AZ



## Qualifications

### PASSED INDUSTRY EXAMS

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

**This individual has passed 0 principal/supervisory exams, 2 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
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 General Securities Representative Examination (S7)	Series 7	12/12/1994
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#### State Securities Law Exams

Exam	Category	Date
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 Uniform Securities Agent State Law Examination (S63)	Series 63	09/08/1994
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### PROFESSIONAL DESIGNATIONS

This section details that the representative has reported 1 professional designation(s).

#### Chartered Financial Consultant

This representative holds or did hold 1 professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
B	12/13/1994 - 07/03/2006	IDS LIFE INSURANCE COMPANY	CRD# 6321	MINNEAPOLIS, MN

### 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
03/2020 - Present	Ameriprise Financial Services, LLC	Registered Rep	Y	Lexington, KY, United States
07/2006 - 03/2020	Ameriprise Financial Services, Inc.	Registered Rep	Y	Lexington, KY, 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.

Real Estate Ownership; Single Family; 3805 Wyndsong Trl, , Lexington, KY, 40514; Not Investment-Related; 05/31/2021 / This property at 3805 Wyndsong Trail, next door to my primary residence, was purchased by me and remodeled in 2022 and converted to an Ameriprise office -registered with FINRA.; 3805 Wyndsong Trail, , Lexington, KY, 40514; Not Investment-Related; 01/01/2022. Business Ownership; Geraldine Gordon and Assoc.Inc. (sub chapter s corp); ; this legal entity manages my financial planning business, pays bills and tracks expenses for my AMP practice.; 3801 Wyndsong Trail Lexington KY, , ; Not Investment-Related; 01/01/2000; 1 to 9 hours per month; 0 during trading hours. Other Business Activities; Sistine Chapel Audio Book and Book; I began writing a book about the Sistine Chapel last year. Then a co-author joined me and wrote the poetry. As it turned out, it is worthy of publication. I personally paid for the contributors time and will seek to be reimbursed for my expenses if the book becomes an international seller. But the purpose of the book is to donate proceeds from royalties to the Achuar of the Amazon rainforest. We hope to publish an audio book this fall.; 3801 Wyndsong Trail, , Lexington, KY, 40514; Not Investment-Related; 09/01/2023; 10 to 19 hours per month; 1 to 9 during trading hours / Sistine Chapel Book; The Sistine Chapel book I was writing last year was published on Audible and i tunes October 19, 2023. The copyright was donated to Maketai Inc., a non-profit that serves the needs of the Achuar tribes of the rain forest.; 3801 Wyndsong Trail, , Lexington, KY, 40514; Not Investment-Related; 10/19/2023; 0 hours per month; 0 during trading hours / website: TheNewhuman321.org; For Lenten Season 2025, we want approval to launch a 7 episode video series on Utube about Leonardo DaVinci's Last Supper, giving new insights from Geraldine Gordon about this painting, never published before. All proceeds, if any, go to the Achuar tribes of the Amazon rainforest. Geraldine Gordon will not in any way monetize the project. The name of the video series is called DaVinci's Angles. The website is: TheNewHuman321.org We plan future videos about Michelangelo and Raphael and other Renaissance painters. Production work is by Kellner Brown who is not an AMP client.; 3801 Wyndsong Trail, , Lexington, KY, 40514; Not Investment-Related; 03/05/2025; 1 to 9 hours per month; 0 during trading hours.



## Disclosure Summary

### Disclosure Information

#### What you should know about reported disclosure events:

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

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

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

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

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

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

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



## DISCLOSURE EVENT DETAILS

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

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

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Customer Dispute	8

### Regulatory Event

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

#### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	06/09/2017
<b>Docket/Case Number:</b>	<a href="#">2016049353501</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	Ameriprise Financial Services, Inc.
<b>Product Type:</b>	Direct Investment-DPP & LP Interests
<b>Allegations:</b>	Without admitting or denying the findings, Gordon consented to the sanctions and to the entry of findings that she recommended that her customer liquidate a number of diversified investments in her member firm brokerage and IRA accounts, and invest half of her liquid net worth in a single Master Limited Partnership focused on the energy sector. The findings stated that the recommendation was unsuitable because the investment represented an excessive concentration of the customer's net worth. The Master Limited Partnership prospectus described the investment as speculative. Following Gordon's recommendation, the customer invested a total of \$334,000 in the Master Limited Partnership. Gordon's recommendation that the customer invest half of her liquid net worth in this single sector-focused Master Limited Partnership was not suitable for the customer in light of her financial condition and the excessively concentrated nature of the investment.
<b>Current Status:</b>	Final
<b>Resolution:</b>	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?**

No

**Resolution Date:**

06/09/2017

**Sanctions Ordered:**

Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**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?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	10 business days
<b>Start Date:</b>	07/18/2017
<b>End Date:</b>	07/31/2017

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$7,500.00
<b>Portion Levied against individual:</b>	\$7,500.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	07/05/2017
<b>Was any portion of penalty waived?</b>	No

**Amount Waived:**

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<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	
<b>Date Initiated:</b>	06/09/2017
<b>Docket/Case Number:</b>	<a href="#">2016049353501</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	Ameriprise Financial Services, Inc.



<b>Product Type:</b>	Direct Investment-DPP & LP Interests
<b>Allegations:</b>	Without admitting or denying the findings, Gordon consented to the sanctions and to the entry of findings that she recommended that her customer liquidate a number of diversified investments in her member firm brokerage and IRA accounts, and invest half of her liquid net worth in a single Master Limited Partnership focused on the energy sector. The findings stated that the recommendation was unsuitable because the investment represented an excessive concentration of the customer's net worth. The Master Limited Partnership prospectus described the investment as speculative. Following Gordon's recommendation, the customer invested a total of \$334,000 in the Master Limited Partnership. Gordon's recommendation that the customer invest half of her liquid net worth in this single sector-focused Master Limited Partnership was not suitable for the customer in light of her financial condition and the excessively concentrated nature of the investment.
<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>	06/09/2017
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Suspension
<b>Sanction 1 of 1</b>	
<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	10 business days
<b>Start Date:</b>	07/18/2017
<b>End Date:</b>	07/31/2017
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$7,500.00
<b>Portion Levied against individual:</b>	\$7,500.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	



## 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 8

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	Ameriprise Financial Services, Inc.
<b>Allegations:</b>	Trustee alleged the advisor recommended an inappropriate closed end mutual fund in 2014 and did not liquidate the position as instructed.
<b>Product Type:</b>	Mutual Fund
<b>Alleged Damages:</b>	\$149,980.77
<b>Is this an oral complaint?</b>	No
<b>Is this a written complaint?</b>	Yes
<b>Is this an arbitration/CFTC reparation or civil litigation?</b>	No

### Customer Complaint Information

<b>Date Complaint Received:</b>	12/10/2018
<b>Complaint Pending?</b>	No
<b>Status:</b>	Denied
<b>Status Date:</b>	12/12/2018
<b>Settlement Amount:</b>	\$0.00
<b>Individual Contribution Amount:</b>	\$0.00

### Disclosure 2 of 8

<b>Reporting Source:</b>	Individual
<b>Employing firm when activities occurred which led to the complaint:</b>	Ameriprise Financial Services, Inc.
<b>Allegations:</b>	Claimant alleges that from January 2012 to present, Respondents recommended unsuitable investments, to include CB Richard Ellis Realty Trust / Chamber Street Properties REIT, Neuberger Berman Master Limited Partnership Fund, Inc., Clearbridge American Energy MLP Fund, and Tekla World Healthcare Fund. Claimant seeks \$554,596.00 in damages.
<b>Product Type:</b>	Real Estate Security Other: Master Limited Partnerships and Closed-End Management Investment Company
<b>Alleged Damages:</b>	\$554,596.00

### Arbitration Information



**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** FINRA

**Docket/Case #:** 16-01179

**Date Notice/Process Served:** 05/03/2016

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 04/01/2017

**Monetary Compensation Amount:** \$170,000.00

**Individual Contribution Amount:** \$68,000.00

**Broker Statement** The parties settled this matter with Respondent Ameriprise paying \$102,000 and Respondent Gordon paying \$68,000, with these two payments to Claimant totaling \$170,000

### Disclosure 3 of 8

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** AMERIPRISE FINANCIAL SERVICES, INC.

**Allegations:** THE CLIENT ALLEGED THEIR INVESTMENTS FROM AUGUST 2000 TO AUGUST 2008 PERFORMED POORLY AND THEY HAD LOSSES OF \$500,000.

**Product Type:** Mutual Fund

**Alleged Damages:** \$500,000.00

**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:** 01/07/2013

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 02/12/2013

**Settlement Amount:**

**Individual Contribution Amount:**

### Disclosure 4 of 8

**Reporting Source:** Individual



**Employing firm when activities occurred which led to the complaint:** AMERICAN EXPRESS FINANCIAL ADVISORS

**Allegations:** CLIENTS ALLEGE THAT BEGINNING IN JANUARY 1997 THEIR ADVISOR MADE MATERIAL MISREPRESENTATIONS, FAILED TO DISCUSS FEES AND COMMISSIONS, MADE UNSUITABLE INVESTMENT RECOMMENDATIONS, INCLUDING PURCHASING INSURANCE PRODUCTS WITHOUT THEIR KNOWLEDGE. CLAIMANTS ALSO ALLEGE THAT AEFA BREACHED ITS FIDUCIARY DUTY, FAILED TO SUPERVISE AND FAILED TO PROPERLY MANAGE CLAIMANTS ACCOUNTS RESULTING IN UNSPECIFIED FINANCIAL DAMAGES.

**Product Type:** Mutual Fund

**Alleged Damages:** \$0.00

**Alleged Damages Amount Explanation (if amount not exact):** Firm, in good faith, believed the damages could be more than \$5,000.

### Customer Complaint Information

**Date Complaint Received:** 06/30/2003

**Complaint Pending?** No

**Status:** Evolved into Arbitration/CFTC reparation (the individual is a named party)

**Status Date:** 06/26/2003

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):** NASD-DR

**Docket/Case #:** 03-03961

**Date Notice/Process Served:** 06/26/2003

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 01/14/2004

**Monetary Compensation Amount:** \$19,500.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** AEFA PAID [CUSTOMER] AND [OTHER CUSTOMER NAMED] \$19500.00 SETTLEMENT AMOUNT. GERALDINE GORDON DID NOT CONTRIBUTE TO THE SETTLEMENT AMOUNT. [CUSTOMER] AND [OTHER CUSTOMER NAMED] RELEASED AEFA AND GORDON FROM THIS CLAIM.

### Disclosure 5 of 8

**Reporting Source:** Individual



**Employing firm when activities occurred which led to the complaint:** AMERICAN EXPRESS FINANCIAL ADVISORS

**Allegations:** CLAIMANT ALLEGES THAT WHEN SHE ENGAGED AEFA TO WORK WITH HER TO SET UP A FINANCIAL PLAN IN 1996, SHE WAS 75 YEARS OLD AND A [REDACTED] VICTIM. CLAIMANT ALLEGES THAT AEFA AND I DIDN'T EXPLAIN TO HER THE COMMISSIONS, RECOMMENDED UNSUITABLE INVESTMENTS AND RECOMMENDED ANNUITIES AND INSURANCE PRODUCTS THAT WERE SUBJECT TO A CLASS ACTION LAWSUIT. CLAIMANT REQUESTS UNSPECIFIED COMPENSATORY DAMAGES, PUNITIVE DAMAGES, COMMISSIONS PAID, AND INTEREST.

**Product Type:** Mutual Fund(s)

**Other Product Type(s):** ANNUITIES, LIFE INSURANCE

**Alleged Damages:** \$0.00

### Customer Complaint Information

**Date Complaint Received:** 04/03/2003

**Complaint Pending?** No

**Status:** Arbitration/Reparation

**Status Date:** 04/03/2003

**Settlement Amount:**

**Individual Contribution Amount:**

### Arbitration Information

**Arbitration/Reparation Claim filed with and Docket/Case No.:** NASD ARBITRATION 03-02164

**Date Notice/Process Served:** 04/03/2003

**Arbitration Pending?** No

**Disposition:** Settled

**Disposition Date:** 01/28/2004

**Monetary Compensation Amount:** \$300,000.00

**Individual Contribution Amount:** \$0.00

**Broker Statement** AEFA SETTLE4D THIS MATTER FOR \$300,000.00 IN ORDER TO AVOID THE COSTS OF ARBITRATION. I WAS DISMISSED FROM THE CAE AND CONTRIBUTED NOTHING TO THE SETTLEMENT.

### Disclosure 6 of 8

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** AMERICAN EXPRESS FINANCIAL ADVISORS

**Allegations:** THE CLIENT ALLEGED THE ADVISOR PLACED HER IN INVESTMENTS THAT WERE INAPPROPRIATE FOR HER AS AN OLDER CLIENT. SHE REQUESTED



COMPENSATION FOR HER LOSSES.

**Product Type:** Mutual Fund(s)  
**Other Product Type(s):** STRATEGIC PORTFOLIO SERVICE ADVANTAGE  
IDS LIFE LONG TERM CARE INSURANCE  
**Alleged Damages:** \$30,000.00

**Customer Complaint Information**

**Date Complaint Received:** 07/18/2002  
**Complaint Pending?** No  
**Status:** Denied  
**Status Date:** 09/17/2002

**Settlement Amount:****Individual Contribution  
Amount:****Broker Statement**

OUR REVIEW FOUND THE CLIENT HAS SUFFICIENT RETIREMENT INCOME FROM SOCIAL SECURITY AND AN EMPLOYER RETIREMENT PLAN. SHE INFORMED THE ADVISOR THAT SHE DID NOT NEED ACCESS TO HER INVESTMENTS WITH AMERICAN EXPRESS FINANCIAL ADVISORS, BECAUSE THEY ARE INTENDED AS HER DAUGHTER'S INHERITANCE. THEREFORE, THE ADVISOR'S RECOMMENDATIONS WERE BASED ON THE DAUGHTER'S MODERATELY AGGRESSIVE RISK TOLERANCE AND FIFTEEN TO SEVENTEEN YEAR TIME FRAME. WE FOUND THE RECOMMENDATIONS WERE SUITABLE BASED ON THE CLIENT'S STATED GOAL TO INVEST THE FUNDS FOR HER DAUGHTER'S BENEFIT. THE DAUGHTER ATTENDED ANNUAL MEETINGS WITH THE CLIENT AND ADVISOR AND PROVIDED INPUT REGARDING THE INVESTMENTS.

**Disclosure 7 of 8**

**Reporting Source:** Individual  
**Employing firm when activities occurred which led to the complaint:** AMERICAN EXPRESS FINANCIAL ADVISORS

**Allegations:** THE CLIENT ALLEGED I RECOMMENDED UNSUITABLE INVESTMENTS THAT CAUSED THE CLIENT TO INCUR SIGNIFICANT LOSSES WITHIN HER PORTFOLIO.

**Product Type:** Mutual Fund(s)  
**Other Product Type(s):** STRATEGIC PORTFOLIO SERVICE ADVANTAGE ACCOUNT  
**Alleged Damages:** \$250,000.00

**Customer Complaint Information**

**Date Complaint Received:** 07/08/2002  
**Complaint Pending?** No  
**Status:** Closed/No Action  
**Status Date:** 12/18/2002

**Settlement Amount:**

**Individual Contribution Amount:****Broker Statement**

THE CLIENT'S LIFE INSURANCE POLICY AND ANNUITY CONTRACTS FALL UNDER CLASS ACTION, SO NO ADDITIONAL RELIEF CAN BE OFFERED. OUR REVIEW FOUND THE CLIENT AUTHORIZED THE PURCHASES MADE ON HER BEHALF. THE ADVISOR MET WITH THE CLIENT REGULARLY AFTER THE INITIAL PURCHASES WERE MADE. AT ONE POINT, THE CLIENT INSTRUCTED THE ADVISOR TO REALLOCATE SOME OF HER POSITIONS TO MORE CONSERVATIVE HOLDINGS. ALTHOUGH THE CLIENT AUTHORIZED THE PURCHASES, WE FOUND THAT SOME OF HER INVESTMENTS MAY HAVE BEEN BEYOND HER RISK TOLERANCE. WE OFFERED TO COMPENSATE THE CLIENT FOR ONE THIRD OF THE MARKET LOSSES SHE INCURRED, BUT SHE DECLINED OUR OFFER. THE CASE WAS CLOSED WITH NO ACTION TAKEN.

**Disclosure 8 of 8****Reporting Source:**

Individual

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

AMERICAN EXPRESS FINANCIAL ADVISORS

**Allegations:**

THE CLIENTS POA ALLEGED I RECOMMENDED UNSUITABLE INVESTMENTS FOR THE CLIENT AND AS A RESULT, THE CLIENT INCURRED SIGNIFICANT LOSSES.

**Product Type:**

Mutual Fund(s)

**Alleged Damages:**

\$20,000.00

**Customer Complaint Information****Date Complaint Received:**

06/26/2002

**Complaint Pending?**

No

**Status:**

Denied

**Status Date:**

09/10/2002

**Settlement Amount:**

\$0.00

**Individual Contribution Amount:**

\$0.00

**Broker Statement**

MY COMPLIANCE DEPARTMENT REVIEWED THIS MATTER AND FOUND NO FAULT IN MY ACTIONS. THEY FOUND THE CLIENT RECEIVED ALL PROPER DISCLOSURES, HAD FAMILY MEMBERS INVOLVED IN HER DECISION MAKING, AUTHORIZED ALL TRANSACTIONS, AND THE INVESTMENTS SELECTED WERE SUITABLE TO HER.



## End of Report

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