IAPD Report

ROBERT JAMES SIRACUSANO

CRD# 2717239

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When communicating online or investing with any professional, make sure you know who you're dealing with. Imposters might link to sites like BrokerCheck from phishing or similar scam websites, or through social media, trying to steal your personal information or your money.

Please contact FINRA with any concerns.

IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page http://www.nasaa.org/IAPD/IARReports.cfm

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association http://www.nasaa.org

Report Summary

ROBERT JAMES SIRACUSANO (CRD# 2717239)

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 **08/12/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	WELLS FARGO ADVISORS	CRD# 11025	12/03/2003
B	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC	CRD# 11025	12/03/2003

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **52** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.
Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	UBS FINANCIAL SERVICES INC.	8174	NAPERVILLE, IL	07/25/2001 - 12/03/2003
B	UBS FINANCIAL SERVICES INC.	8174	WEEHAWKEN, NJ	10/20/2000 - 12/03/2003
B	EDWARD JONES	250	ST. LOUIS, MO	01/01/1997 - 11/17/2000

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

DISCLOSURE INFORMATION

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

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

The following types of events are disclosed about this representative:

Type	Count
Customer Dispute	3

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Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works.
This individual is currently registered with **52** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **WELLS FARGO ADVISORS**

Main Address: ONE NORTH JEFFERSON AVENUE
MAIL CODE: H0004-05E
ST. LOUIS, MO 63103-2205

Firm ID#: 11025

	Regulator	Registration	Status	Date
B	FINRA	General Securities Representative	Approved	12/03/2003
B	FINRA	General Securities Sales Supervisor	Approved	03/23/2004
B	Alabama	Agent	Approved	07/07/2008
B	Alaska	Agent	Approved	11/24/2025
B	Arizona	Agent	Approved	03/27/2006
B	Arkansas	Agent	Approved	11/25/2025
B	California	Agent	Approved	12/03/2003
B	Colorado	Agent	Approved	02/20/2007
B	Connecticut	Agent	Approved	08/03/2012
IA	Connecticut	Investment Adviser Representative	Approved	02/06/2026
B	Delaware	Agent	Approved	03/16/2004
B	District of Columbia	Agent	Approved	09/15/2023
B	Florida	Agent	Approved	02/15/2005

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Qualifications

	Regulator	Registration	Status	Date
IA	Florida	Investment Adviser Representative	Approved	10/27/2022
B	Georgia	Agent	Approved	07/21/2005
B	Hawaii	Agent	Approved	02/10/2026
B	Idaho	Agent	Approved	12/16/2025
IA	Illinois	Investment Adviser Representative	Approved	12/03/2003
B	Illinois	Agent	Approved	12/04/2003
B	Indiana	Agent	Approved	12/04/2003
B	Iowa	Agent	Approved	10/02/2007
B	Kansas	Agent	Approved	02/19/2015
B	Kentucky	Agent	Approved	09/29/2022
B	Louisiana	Agent	Approved	03/11/2022
B	Maine	Agent	Approved	05/15/2014
B	Maryland	Agent	Approved	10/25/2007
B	Massachusetts	Agent	Approved	10/14/2021
B	Michigan	Agent	Approved	12/03/2003
B	Minnesota	Agent	Approved	08/09/2012
B	Mississippi	Agent	Approved	06/14/2011
B	Missouri	Agent	Approved	11/28/2005
B	Montana	Agent	Approved	05/01/2026

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Qualifications

	Regulator	Registration	Status	Date
B	Nebraska	Agent	Approved	03/09/2005
B	Nevada	Agent	Approved	05/11/2018
B	New Hampshire	Agent	Approved	01/07/2026
B	New Jersey	Agent	Approved	12/03/2003
B	New Mexico	Agent	Approved	08/27/2024
B	New York	Agent	Approved	12/03/2003
B	North Carolina	Agent	Approved	03/16/2004
B	North Dakota	Agent	Approved	12/01/2025
B	Ohio	Agent	Approved	12/03/2003
B	Oklahoma	Agent	Approved	12/07/2010
B	Oregon	Agent	Approved	03/25/2020
B	Pennsylvania	Agent	Approved	12/03/2003
B	Puerto Rico	Agent	Approved	12/10/2025
B	Rhode Island	Agent	Approved	12/01/2025
B	South Carolina	Agent	Approved	05/22/2006
B	South Dakota	Agent	Approved	10/29/2009
B	Tennessee	Agent	Approved	10/19/2005
B	Texas	Agent	Approved	12/03/2003
IA	Texas	Investment Adviser Representative	Restricted	08/29/2016

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Qualifications

	Regulator	Registration	Status	Date
			Approval	
B	Utah	Agent	Approved	12/03/2003
B	Vermont	Agent	Approved	08/06/2020
B	Virginia	Agent	Approved	04/28/2006
B	Washington	Agent	Approved	09/10/2004
B	West Virginia	Agent	Approved	09/21/2006
B	Wisconsin	Agent	Approved	04/12/2004
B	Wyoming	Agent	Approved	04/13/2020

Branch Office Locations

WELLS FARGO ADVISORS
400 EAST DIEHL RD
SUITE 330
NAPERVILLE, IL 60563

WELLS FARGO ADVISORS
BRADENTON BEACH, FL

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

Principal/Supervisory Exams

	Exam	Category	Date
B	General Securities Sales Supervisor - General Module Examination (S10)	Series 10	03/17/2004
B	General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	02/18/2004

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	General Securities Representative Examination (S7)	Series 7	12/30/1996

State Securities Law Exams

	Exam	Category	Date
IA B	Uniform Combined State Law Examination (S66)	Series 66	06/13/2001
B	Uniform Securities Agent State Law Examination (S63)	Series 63	01/03/1997

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.

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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	07/25/2001 - 12/03/2003	UBS FINANCIAL SERVICES INC.	CRD# 8174	NAPERVILLE, IL
B	10/20/2000 - 12/03/2003	UBS FINANCIAL SERVICES INC.	CRD# 8174	WEEHAWKEN, NJ
B	01/01/1997 - 11/17/2000	EDWARD JONES	CRD# 250	ST. LOUIS, MO

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
05/2009 - Present	WELLS FARGO ADVISORS FINANCIAL NETWORK LLC	REGISTERED REP	Y	NAPERVILLE, IL, 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.

PS AVIATION LLC; NOT INV RELATED; NAPERVILLE, IL; 50% OWNERSHIP; START 1/23/2012; 25 HOURS DEVOTED PER MONTH; NONE DURING TRADING HOURS; AIRCRAFT OWNERSHIP, BUYING AND SELLING.
REGENERATE THERAPY LLC, NOT INV RELATED, AURORA, IL, 100% OWNER, START 5/1/2018, 1 HOUR PER MONTH/0 DURING TRADING DUTIES: MANAGING EXPENSES.
CHICAGO AVIATION SERVICES; NOT INV RELATED; CHICAGO, IL; 100% OWNERSHIP; START 9/20/2019; NUMBER OF HOURS PER MONTH 30; NUMBER OF HOURS DURING TRADING 15; AIRCRAFT MAINTENANCE AND REPAIR.
RAGF REAL ESTATE LLC, INV RELATED, NAPERVILLE, IL, 100% OWNERSHIP, START 4/22/2021, 1 HOUR PER MONTH, ZERO HOURS DURING TRADING, TO HOLD RENTAL PROPERTY.
FAMILY INTELLIGENCE; INV RELATED;NAPERVILLE,IL; STAFFED BY LICENSED CPA'S;100% OWNERSHIP; START DATE: 08/01/2026; 15 HRS PER MONTH; 15 HRS DURING TRADING;

SIRACUSANO - SLEEZER LLC, INV RELATED, NAPERVILLE, IL, 65% OWNERSHIP, START 2/22/2010, 200 HOURS PER MONTH, 150 HOURS DURING TRADING, FINET PRACTICE EXPENSES.
REAL WORLD AVIAVIONT INC., NOT INV RELATED, NAPERVILLE, IL, 100% OWNERSHIP, START 2/18/2014, 100 HOURS PER MONTH, 50 HOURS DURING TRADING, HOLDING COMPANY FOR AVIATION BUSINESS EXPENSES.
SIRACUSANO MARKETING GROUP, LLC, INVT RELATED, NAPERVILLE, IL, 100% OWNERSHIP, START 12/20/2021, 1 HR PER MONTH, 0 HRS DURING TRADING, WORK WITH INTERNET MARKETING COMPANIES TO FIND CASES FOR ATTORNEYS.
SIRACUSANO GAMING LLC; INV. RELATED; NAPERVILLE, IL; 100% OWNERSHIP; START 1/15/2023; 3 HRS PER MONTH; 0 HRS DURING TRADING; LICENSE AND LEASE GAMIN G MACHINES VIA A TERMINAL OPERATOR.
SIRACUSANO AVIATION SERVICES LLC, NOT INV RELATED, NAPERVILLE, IL, 100% OWNERSHIP, START 7/22/24, 1 HRS PER MONTH, 0 HRS DURING TRADING, AIRCRAFT OWNERSHIP.

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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.

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DISCLOSURE EVENT DETAILS

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

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

The following types of events are disclosed about this representative:

Type	Count
Customer Dispute	3

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 3

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC
Allegations:	On or about September 2021, claimant alleges that unsuitable recommendations were made to purchase an annuity and mutual funds.
Product Type:	Other: Miscellaneous
Alleged Damages:	$0.00
Alleged Damages Amount Explanation (if amount not exact):	Claimant is seeking at least $1,000,000 in damages.
Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	24-01955
Filing date of arbitration/CFTC reparation or civil litigation:	09/11/2024

Customer Complaint Information

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Date Complaint Received:	09/11/2024
Complaint Pending?	No
Status:	Settled
Status Date:	11/14/2025
Settlement Amount:	$100,000.00
Individual Contribution Amount:	$0.00
Broker Statement	In order to avoid the expense of a hearing, and without making an admission of liability, Respondent resolved the pending action against it for $100,000.00.

Disclosure 2 of 3

Reporting Source:	Regulator
Employing firm when activities occurred which led to the complaint:	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC
Allegations:	BREACH OF FIDUCIARY DUTY, VIOLATIONS OF FINRA CONDUCT RULES, NEGLIGENCE, MISREPRESENTATION, AND VICARIOUS LIABILITY
Product Type:	Mutual Fund Other: ANNUITIES AND EQUITIES
Alleged Damages:	$641,379.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.:	FINRA - CASE #11-01815
Date Notice/Process Served:	05/05/2011
Arbitration Pending?	No
Disposition:	Award
Disposition Date:	09/12/2012
Disposition Detail:	SIRACUSANO WAS THE SUBJECT OF THE CLAIMANT'S STATEMENT OF CLAIM FOR THIS ARBITRATION ALLEGING THAT HE WITH HIS MEMBER FIRM CONTRIBUTED TO THE SALES PRACTICE VIOLATIONS. THE FIRM IS LIABLE FOR AND SHALL PAY TO CLAIMANT THE SUM OF $8,500.00 IN COMPENSATORY DAMAGES.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	WELLS FARGO FINANCIAL NETWORK, LLC
Allegations:	CLAIMANTS, RESIDENTS OF INDIANA, ALLEGE UNSUITABLE INVESTMENTS IN VARIABLE ANNUITIES AGAINST FA BETWEEN LATE 2003 - 2010. CLAIMANTS SEEK DAMAGES OF $641,388.00.
Product Type:	Annuity-Variable
Alleged Damages:	$641,388.00

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Is this an oral complaint?	No
Is this a written complaint?	No
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	11-01815
Filing date of arbitration/CFTC reparation or civil litigation:	05/11/2011

Customer Complaint Information

Date Complaint Received:	05/17/2011
Complaint Pending?	No
Status:	Arbitration Award/Monetary Judgment (for claimants/plaintiffs)
Status Date:	09/12/2012
Settlement Amount:	$8,500.00
Individual Contribution Amount:	$0.00
Broker Statement	AFTER A HEARING, IN WHICH THE CLAIMANT SOUGHT $641,374.00, THE ARBITRATION PANEL ENTERED AN AWARD GRANTING CLAIMANT $8,500.00.

Disclosure 3 of 3

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	EDWARD JONES
Allegations:	TRUSTEE FOR THE FAMILY TRUST IS QUESTIONING THE SUITABILITY OF THE HARTFORD VARIABLE LIFE INSURANCE POLICY ISSUED IN 1999. POTENTIAL LOSSES COULD EXCEED $5,000.
Product Type:	Insurance
Alleged Damages:	$5,000.00

Customer Complaint Information

Date Complaint Received:	09/20/2003
Complaint Pending?	No
Status:	Denied
Status Date:	10/21/2003
Settlement Amount:	
Individual Contribution Amount:	
Firm Statement	UPON REVIEW OF THE LETTER IN WHICH THE SUITABILITY OF THE PURCHASE OF THE HARTFORD VARIABLE LIFE INSURANCE POLICY [POLICY #] ISSUED ON 12/27/99 HAS BEEN QUESTIONED, IT IS

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UNDERSTOOD THAT THE CLIENT, HER ATTORNEY, HER CPA, HER SON AND THE TRUSTEE FOR THE FAMILY TRUST WERE PRESENT DURING THE DISCUSSIONS WITH THE IR REGARDING THE PURCHASE OF THIS POLICY. WE HAVE REVIEWED THE DOCUMENTS ON THIS POLICY PROVIDED BY HARTFORD LIFE WHICH INCLUDED THE APPLICATION, AS-SOLD ILLUSTRATION, POLICY DELIVERY RECEIPT AND SPECIFICATION PAGES. IT WOULD APPEAR THE PARTIES INVOLVED WERE AWARE AND UNDERSTOOD THE FINANCIAL STATE OF THE CLIENT AT THE TIME THE POLICY WAS ISSUED AND ESTABLISHED THE POLICY FOR ESTATE PLANNING PURPOSES. THE AS-SOLD ILLUSTRATION (PROVIDED PRIOR TO THE POLICY BEING ISSUED) SETS OUT SPECIFIC INFORMATION REGARDING THE POLICY TO INCLUDE THE AMOUNT OF THE ANNUAL PREMIUM. AS THE DOCUMENT REFLECTS, THE TRUSTEE REVIEWED THE INFORMATION AND ACKNOWLEDGED HIS UNDERSTANDING OF THE ASPECTS OF THE POLICY (INCLUDING THE ANNUAL PREMIUM) THROUGH HIS SIGNATURE ON THE DOCUMENT DATED 12/21/99. THE APPLICATION ALSO SETS OUT THE ANNUAL PREMIUM OF THE POLICY AND WAS SIGNED BY THE TRUSTEE AND THE CLIENT ON THE SAME DATE, 12/21/99. IT WOULD, THEREFORE, APPEAR THE TRUSTEE AND THE CLIENT MADE THE DETERMINATION AS TO THE ABILITY TO COVER THE ANNUAL PREMIUM AND ACCEPTED THE TERMS OF THE POLICY. BASED ON OUR REVIEW, NO FURTHER ACTION WILL BE TAKEN ON THIS MATTER.

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	EDWARD JONES
Allegations:	TRUSTEE FOR THE FAMILY TRUST IS QUESTIONING THE SUITABILITY OF THE HARTFORD VARIABLE LIFE INSURANCE POLICY ISSUED IN 1999. POTENTIAL LOSSES COULD EXCEED $5,000.
Product Type:	Insurance
Alleged Damages:	$5,000.00

Customer Complaint Information

Date Complaint Received:	09/20/2003
Complaint Pending?	No
Status:	Denied
Status Date:	10/21/2003
Settlement Amount:	
Individual Contribution Amount:	
Broker Statement	UPON REVIEW OF THE LETTER IN WHICH THE SUITABILITY OF THE PURCHASE OF THE HARTFORD VARIABLE LIFE INSURANCE POLICY [POLICY #] ISSUED ON 12/27/99 HAS BEEN QUESTIONED, IT IS UNDERSTOOD THAT THE CLIENT, HER ATTORNEY, HER CPA, HER SON AND THE TRUSTEE FOR THE FAMILY TRUST WERE PRESENT DURING THE DISCUSSIONS WITH THE IR REGARDING THE PURCHASE OF THIS POLICY. WE HAVE REVIEWED THE DOCUMENTS ON THIS POLICY PROVIDED BY HARTFORD LIFE WHICH INCLUDED THE APPLICATION, AS-SOLD ILLUSTRATION, POLICY DELIVERY RECEIPT AND SPECIFICATION PAGES. IT WOULD APPEAR THE PARTIES INVOLVED WERE AWARE AND

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UNDERSTOOD THE FINANCIAL STATE OF THE CLIENT AT THE TIME THE POLICY WAS ISSUED AND ESTABLISHED THE POLICY FOR ESTATE PLANNING PURPOSES. THE AS-SOLD ILLUSTRATION (PROVIDED PRIOR TO THE POLICY BEING ISSUED) SETS OUT SPECIFIC INFORMATION REGARDING THE POLICY TO INCLUDE THE AMOUNT OF THE ANNUAL PREMIUM. AS THE DOCUMENT REFLECTS, THE TRUSTEE REVIEWED THE INFORMATION AND ACKNOWLEDGED HIS UNDERSTANDING OF THE ASPECTS OF THE POLICY (INCLUDING THE ANNUAL PREMIUM) THROUGH HIS SIGNATURE ON THE DOCUMENT DATED 12/21/99. THE APPLICATION ALSO SETS OUT THE ANNUAL PREMIUM OF THE POLICY AND WAS SIGNED BY THE TRUSTEE AND THE CLIENT ON THE SAME DATE, 12/21/99. IT WOULD, THEREFORE, APPEAR THE TRUSTEE AND THE CLIENT MADE THE DETERMINATION AS TO THE ABILITY TO COVER THE ANNUAL PREMIUM AND ACCEPTED THE TERMS OF THE POLICY. BASED ON OUR REVIEW, NO FURTHER ACTION WILL BE TAKEN ON THIS MATTER.

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End of Report

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