IAPD Report

ERIC RICHARD HEMINGWAY

CRD# 2945792

Section Title	Page(s)

IAPD Information About Representatives

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

What is included in a IAPD report?

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

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

Where did this information come from?

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

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

How current is this information?

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

Need help interpreting this report?

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

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

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

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

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

Report Summary

ERIC RICHARD HEMINGWAY (CRD# 2945792)

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 **07/02/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
B	UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER	CRD# 20804	09/25/2015
IA	UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER	CRD# 20804	09/29/2015

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **31** 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	MONTICELLO INVESTMENT SERVICES, INC.	140851	MINNETONKA, MN	01/16/2014 - 09/28/2015
B	MIDAMERICA FINANCIAL SERVICES, INC.	47351	MINNETONKA, MN	01/18/2011 - 09/28/2015
B	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	2881	EDINA, MN	03/05/2001 - 04/23/2010

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

Employment 1 of 1

Firm Name: **UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER**

Main Address: 7333 EAST DOUBLETREE RANCH RD, SUITE 120
SCOTTSDALE, AZ 85258

Firm ID#: 20804

	Regulator	Registration	Status	Date
B	FINRA	Invest. Co and Variable Contracts	Approved	09/25/2015
B	Alabama	Agent	Approved	04/12/2016
B	Alaska	Agent	Approved	04/29/2016
B	Arizona	Agent	Approved	09/25/2015
B	Arkansas	Agent	Approved	01/07/2026
B	California	Agent	Approved	09/25/2015
B	Colorado	Agent	Approved	11/19/2018
B	Connecticut	Agent	Approved	09/25/2015
B	Florida	Agent	Approved	04/07/2022
B	Georgia	Agent	Approved	02/02/2023
B	Illinois	Agent	Approved	06/01/2022
B	Indiana	Agent	Approved	06/17/2026
B	Iowa	Agent	Approved	02/10/2016

Qualifications

	Regulator	Registration	Status	Date
B	Kansas	Agent	Approved	03/25/2024
B	Maryland	Agent	Approved	02/16/2016
B	Massachusetts	Agent	Approved	02/22/2023
B	Minnesota	Agent	Approved	09/25/2015
IA	Minnesota	Investment Adviser Representative	Approved	10/02/2015
B	Missouri	Agent	Approved	05/21/2025
B	Nebraska	Agent	Approved	07/07/2026
B	Nevada	Agent	Approved	06/18/2024
B	New Jersey	Agent	Approved	04/13/2016
B	New Mexico	Agent	Approved	04/07/2022
B	New York	Agent	Approved	09/25/2015
B	North Carolina	Agent	Approved	02/28/2018
B	North Dakota	Agent	Approved	03/01/2021
B	Oregon	Agent	Approved	06/22/2016
B	Pennsylvania	Agent	Approved	06/26/2026
B	South Carolina	Agent	Approved	04/07/2022
B	South Dakota	Agent	Approved	10/05/2018
B	Virginia	Agent	Approved	06/01/2020
B	Washington	Agent	Approved	04/17/2018

Qualifications

	Regulator	Registration	Status	Date
B	Wisconsin	Agent	Approved	06/21/2023

Branch Office Locations

UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER
600 Highway 169 S
STE 1500
St. Louis Park, MN 55426

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
	No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	05/21/1998

State Securities Law Exams

	Exam	Category	Date
B	Uniform Securities Agent State Law Examination (S63)	Series 63	06/08/2000

PROFESSIONAL DESIGNATIONS

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

No information reported.

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

Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/16/2014 - 09/28/2015	MONTICELLO INVESTMENT SERVICES, INC.	CRD# 140851	MINNETONKA, MN
B	01/18/2011 - 09/28/2015	MIDAMERICA FINANCIAL SERVICES, INC.	CRD# 47351	MINNETONKA, MN
B	03/05/2001 - 04/23/2010	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	CRD# 2881	EDINA, MN
B	03/05/2001 - 01/01/2002	ROBERT W. BAIRD & CO. INCORPORATED	CRD# 8158	MILWAUKEE, WI
B	06/15/1998 - 02/27/2001	ROBERT W. BAIRD & CO. INCORPORATED	CRD# 8158	MILWAUKEE, WI
B	05/22/1998 - 02/27/2001	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	CRD# 2881	MILWAUKEE, WI

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
10/2022 - Present	HEMINGWAY WEALTH MANAGEMENT (INSURANCE AGENT)	MANAGING PARTNER & FOUNDER	Y	MINNETONKA, MN, United States
09/2022 - Present	Chiswick Lane, Inc.	President	N	Minnetonka, MN, United States
02/2017 - Present	CHISWICK LANE, INC.	PRESIDENT	Y	MINNETONKA, MN, United States
08/2015 - Present	UNITED PLANNERS' FINANCIAL SERVICES	REGISTERED REP	Y	SCOTTSDALE, AZ, United States
01/2002 - Present	PROFESSIONAL BUSINESS CONSORTIUM	CO-FOUNDING MEMBER/PRESIDENT	N	PLYMOUTH, MN, United States
12/2018 - 01/2024	Successor Executor	Successor Executor	Y	Minnetonka, MN, United States
04/2021 - 09/2022	Eric Hemingway	Self	N	Minnetonka, MN, United States

Registration & Employment History

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

1.) HEMINGWAY WEALTH MANAGEMENT (D/B/A) - MANAGING PARTNER & FOUNDER - DBA NAME FOR MARKETING PURPOSES ONLY - MINNETONKA, MN - SINCE 10/2022 - INVESTMENT RELATED
2.) HEMINGWAY WEALTH MANAGEMENT (INSURANCE AGENT) - MANAGING PARTNER - NON-VARIABLE INSURANCE - MINNETONKA, MN - SINCE 10/2022 - INVESTMENT RELATED
3.) CHISWICK LANE, INC.- PRESIDENT - LEASING OUT OFFICE SPACE - MINNETONKA, MN - SINCE 02/2017 - INVESTMENT RELATED
4.) CHISWICK LANE, INC. - PRESIDENT - DBA NAME FOR MARKETING PURPOSES ONLY - MAPLE GROVE, MN - SINCE 08/2022 - INVESTMENT RELATED
5.) CHISWICK LANE, INC. - PRESIDENT - CONSULTING SERVICES - MINNETONKA, MN - SINCE 09/2022 - NOT INVESTMENT RELATED
6.) SELF - VOLUNTEER - COMMUNITY, CIVIC OR CHARITABLE BOARD MEMBER OR OFFICER - PLYMOUTH, MN - SINCE 09/2024 - NOT INVESTMENT RELATED.

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
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 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	06/28/2012
Docket/Case Number:	2010022648601
Employing firm when activity occurred which led to the regulatory action:	NORTHWESTERN MUTUAL INVESTMENT SERVICES, INC.
Product Type:	Other: EQUITY INDEXED ANNUITIES
Allegations:	FINRA RULE 2010, NASD RULES 2110, 3030 - ERIC RICHARD HEMINGWAY'S MEMBER FIRM PERMITTED THE SALE OF EQUITY INDEXED ANNUITIES (EIAS) BUT CHANGED ITS POLICY AND PROHIBITED THE SALE OF EIAS. HEMINGWAY'S SUPERVISOR GAVE HIM PERMISSION TO CONTINUE SERVICING AND RECEIVING COMPENSATION FROM EXISTING EIA CUSTOMERS ALTHOUGH HIS FIRM'S POLICY PROHIBITED HIM FROM SELLING NEW CONTRACTS TO THESE CUSTOMERS. HEMINGWAY SOLD 54 EIAS TO 37 CUSTOMERS, INCLUDING 31 FIRM CUSTOMERS; 40 OF THE NEW POLICIES WERE PURCHASED BY CUSTOMERS WHO PREVIOUSLY PURCHASED EIAS WITH HEMINGWAY WHEN HIS FIRM PERMITTED HIM TO DO SO AND THE FUNDING FOR THE NEW CONTRACTS CAME FROM OLD CONTRACTS. FOURTEEN (14) POLICIES WERE SOLD TO CUSTOMERS MAKING AN EIA PURCHASE FOR THE FIRST TIME. HEMINGWAY EARNED APPROXIMATELY $300,000 IN COMMISSIONS FROM THE SALE OF EIAS; APPROXIMATELY $53,000 RELATED TO THE 14 POLICIES SOLD TO FIRST-TIME CUSTOMERS. HEMINGWAY DID NOT PROVIDE PROMPT WRITTEN

	NOTICE OF THIS OUTSIDE BUSINESS ACTIVITY TO HIS MEMBER FIRM AND DID NOT RECEIVE APPROVAL TO SELL NEW EIAS.
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?	No
Resolution Date:	06/28/2012
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	
Sanction Type:	Suspension
Capacities Affected:	ANY CAPACITY
Duration:	FOUR MONTHS
Start Date:	07/16/2012
End Date:	11/15/2012
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$5,000.00
Portion Levied against individual:	$5,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	07/19/2012
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, HEMINGWAY CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED $5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR FOUR MONTHS. THE SUSPENSION IS IN EFFECT FROM JULY 16, 2012 THROUGH NOVEMBER 15, 2012.

Reporting Source:	Individual
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	06/28/2012

Docket/Case Number:	2010022648601
Employing firm when activity occurred which led to the regulatory action:	NORTHWESTERN MUTUAL INVESTMENT SERVICES
Product Type:	Other: EQUITY INDEXED ANNUITY
Allegations:	FINRA RULE 2010, NASD RULES 2110, 3030 - ERIC RICHARD HEMINGWAY'S MEMBER FIRM PERMITTED THE SALE OF EQUITY INDEXED ANNUITIES (EIAS) BUT CHANGED ITS POLICY AND PROHIBITED THE SALE OF EIAS. HEMINGWAY'S SUPERVISOR GAVE HIM PERMISSION TO CONTINUE SERVICING AND RECEIVING COMPENSATION FROM EXISTING EIA CUSTOMERS ALTHOUGH HIS FIRM'S POLICY PROHIBITED HIM FROM SELLING NEW CONTRACTS TO THESE CUSTOMERS. HEMINGWAY SOLD 54 EIAS TO 37 CUSTOMERS, INCLUDING 31 FIRM CUSTOMERS; 40 OF THE NEW POLICIES WERE PURCHASED BY CUSTOMERS WHO PREVIOUSLY PURCHASED EIAS WITH HEMINGWAY WHEN HIS FIRM PERMITTED HIM TO DO SO AND THE FUNDING FOR THE NEW CONTRACTS CAME FROM OLD CONTRACTS. FOURTEEN (14) POLICIES WERE SOLD TO CUSTOMERS MAKING AN EIA PURCHASE FOR THE FIRST TIME. HEMINGWAY EARNED APPROXIMATELY $300,000 IN COMMISSIONS FROM THE SALE OF EIAS; APPROXIMATELY $53,000 RELATED TO THE 14 POLICIES SOLD TO FIRST-TIME CUSTOMERS. HEMINGWAY DID NOT PROVIDE PROMPT WRITTEN NOTICE OF THIS OUTSIDE BUSINESS ACTIVITY TO HIS MEMBER FIRM AND DID NOT RECEIVE APPROVAL TO SELL NEW EIAS.
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?	No
Resolution Date:	06/28/2012
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	ANY CAPACITY
Duration:	FOUR MONTHS
Start Date:	07/16/2012
End Date:	11/15/2012
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$5,000.00
Portion Levied against individual:	$5,000.00
Payment Plan:	

Is Payment Plan Current:	
Date Paid by individual:	07/19/2012
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, HEMINGWAY CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS FINED $5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR FOUR MONTHS. THE SUSPENSION IS IN EFFECT FROM JULY 16, 2012 THROUGH NOVEMBER 15, 2012. MR. HEMINGWAY WAS LICENSED TO SELL EQUITY INDEXED ANNUITIES. FIRM ALLOWED SALES OF EQUITY INDEXED ANNUITIES IN THE PAST. MR. HEMINGWAY DID NOT ATTEMPT TO CONCEAL HIS OFFERING OF THIS PRODUCT TO CERTAIN CLIENTS WHERE, IN HIS VIEW, IT WAS THE MOST APPROPRIATE AND SUITABLE PRODUCT AVAILABLE FOR A CLIENT.

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:	NMIS, LLC
Termination Type:	Permitted to Resign
Termination Date:	04/02/2010
Allegations:	REPRESENTATIVE WAS PERMITTED TO RESIGN WHILE UNDER INTERNAL REVIEW FOR SELLING UNREGISTERED EQUITY INDEXED ANNUITIES (A/K/A FIXED INDEXED ANNUITIES) IN VIOLATION OF FIRM POLICY.
Product Type:	Annuity-Fixed

Reporting Source:	Individual
Firm Name:	NORTHWESTERN MUTUAL INVESTMENT SERVICES
Termination Type:	Permitted to Resign
Termination Date:	04/02/2010
Allegations:	REPRESENTATIVE WAS PERMITTED TO RESIGN WHILE UNDER INTERNAL REVIEW FOR SELLING UNREGISTERED EQUITY INDEXED ANNUITIES (A/K/A FIXED INDEXED ANNUITIES) IN VIOLATION OF FIRM POLICY.
Product Type:	Annuity-Fixed
Broker Statement	REPRESENTATIVE WAS LICENSED TO SELL EQUITY INDEXED ANNUITIES. FIRM ALLOWED SALES OF EQUITY INDEXED ANNUITIES IN THE PAST. REPRESENTATIVE DID NOT ATTEMPT TO CONCEAL HIS OFFERING OF THIS PRODUCT TO CERTAIN CLIENTS WHERE, IN HIS VIEW, IT WAS THE MOST APPROPRIATE AND SUITABLE PRODUCT AVAILABLE FOR A CLIENT.

End of Report

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