



## IAPD Report

# PAUL DAVID FERRANTE

CRD# 4525287

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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

### PAUL DAVID FERRANTE (CRD# 4525287)

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 **05/18/2026**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
<b>B</b>	MML INVESTORS SERVICES, LLC	CRD# 10409	03/21/2011
<b>IA</b>	MML INVESTORS SERVICES, LLC	CRD# 10409	01/11/2022

### QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **17** 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>	MML INVESTORS SERVICES, LLC	10409	Boca Raton, FL	05/19/2021 - 12/10/2021
<b>B</b>	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	2881	NEW YORK, NY	08/07/2002 - 02/16/2011

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

### Employment 1 of 1

Firm Name: **MML INVESTORS SERVICES, LLC**  
Main Address: 1295 STATE STREET  
SPRINGFIELD, MA 01111-0001  
Firm ID#: 10409

	Regulator	Registration	Status	Date
<b>B</b>	FINRA	Invest. Co and Variable Contracts	Approved	03/21/2011
<b>B</b>	FINRA	General Securities Representative	Approved	01/19/2016
<b>B</b>	California	Agent	Approved	12/16/2021
<b>B</b>	Connecticut	Agent	Approved	04/19/2013
<b>B</b>	District of Columbia	Agent	Approved	08/22/2023
<b>B</b>	Florida	Agent	Approved	10/22/2020
<b>IA</b>	Florida	Investment Adviser Representative	Approved	05/05/2025
<b>B</b>	Georgia	Agent	Approved	01/24/2018
<b>B</b>	Illinois	Agent	Approved	01/30/2025
<b>B</b>	Maryland	Agent	Approved	01/31/2023
<b>B</b>	Massachusetts	Agent	Approved	01/31/2023
<b>B</b>	Nevada	Agent	Approved	05/22/2019
<b>B</b>	New Jersey	Agent	Approved	12/09/2019



### Qualifications

Regulator	Registration	Status	Date
<b>B</b> New York	Agent	Approved	03/28/2011
<b>IA</b> New York	Investment Adviser Representative	Approved	01/11/2022
<b>B</b> North Carolina	Agent	Approved	03/25/2025
<b>B</b> Pennsylvania	Agent	Approved	04/09/2021
<b>B</b> Texas	Agent	Approved	05/18/2021
<b>IA</b> Texas	Investment Adviser Representative	Restricted Approval	01/13/2022
<b>B</b> Virginia	Agent	Approved	07/19/2024
<b>B</b> Washington	Agent	Approved	04/13/2023
<b>B</b> Wyoming	Agent	Approved	08/11/2025

### Branch Office Locations

**MML INVESTORS SERVICES, LLC**  
MAMARONECK, NY

**MML INVESTORS SERVICES, LLC**  
90 Park Ave  
18th Floor  
New York, NY 10016

**MML INVESTORS SERVICES, LLC**  
BOCA RATON, FL

**MML INVESTORS SERVICES, LLC**  
220 Congress Park Drive  
Suite 340  
Delray Beach, FL 33445



## 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 2 state securities law exams.**

#### 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	01/19/2016
Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	08/06/2002

#### State Securities Law Exams

Exam	Category	Date
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Uniform Combined State Law Examination (S66)	Series 66	01/11/2022
Uniform Securities Agent State Law Examination (S63)	Series 63	08/12/2002

### 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	05/19/2021 - 12/10/2021	MML INVESTORS SERVICES, LLC	CRD# 10409	Boca Raton, FL
B	08/07/2002 - 02/16/2011	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	CRD# 2881	NEW YORK, NY

#### 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
03/2011 - Present	MML INVESTORS SERVICES, LLC	REGISTERED REPRESENTATIVE	Y	NEW YORK, NY, United States
01/2011 - Present	MASS MUTUAL LIFE INSURANCE COMPANY	AGENT	Y	NEW YORK, NY, United States

#### OTHER BUSINESS ACTIVITIES

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

(1)NAME: PAUL FERRANTE / LENOX ADVISORS INV REL: Y ADD: 90 PARK AVENUE 18TH FLOOR NEW YORK NY 10016 NATURE: INSURANCE POSITION: SALES AGENT START DATE: 01/2011 NO. HR/MO: 2 NO. HR/MO DURING SEC TRADING: 2

(2)NAME: PAUL FERRANTE INV REL: Y ADD: 640 SHORE ACRES DRIVE MAMARONECK, NY 10543 NATURE: RENTAL PROPERTY POSITION: OWNER START DATE: 12/2003 NO. HR/MO: 2 NO. HR/MO DURING SEC TRADING: 0.5 DESCRIBE DUTIES: PICK UP RENT, HANDLE TENANT ISSUES IN APARTMENTS, RENEW LEASES.



## 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

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	11/01/2013
<b>Docket/Case Number:</b>	<a href="#">2011026450201</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FINRA RULE 2010: WHILE REGISTERED WITH HIS MEMBER FIRM AND IN ANTICIPATION OF HIS MOVE TO A NEW FIRM, FERRANTE MOVED DOCUMENTS RELATED TO FIRM CUSTOMERS HE SERVICED FROM HIS FIRM OFFICE TO HIS HOME. THE DOCUMENTS CONTAINED NONPUBLIC PERSONAL INFORMATION, AS THAT TERM IS DEFINED UNDER REGULATION S-P OF THE SECURITIES EXCHANGE ACT OF 1934, AND FERRANTE MOVED THEM WITHOUT THE AUTHORIZATION AND IN CONTRAVENTION OF HIS FIRM'S POLICIES. AMONG OTHER THINGS, THE NONPUBLIC PERSONAL INFORMATION INCLUDED CUSTOMERS' ASSET AND INCOME INFORMATION, HEALTH INFORMATION, ADDRESSES, BIRTHDATES, AND EMPLOYMENT INFORMATION. BY REMOVING THE CUSTOMERS' FILES FROM HIS FIRM'S CONTROL AND POSSESSION, FERRANTE PLACED THE CUSTOMERS' NONPUBLIC PERSONAL INFORMATION AT RISK.
<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>	11/01/2013
<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>	FIVE BUSINESS DAYS
<b>Start Date:</b>	12/02/2013
<b>End Date:</b>	12/06/2013

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	Yes
<b>Date Paid by individual:</b>	11/20/2013
<b>Was any portion of penalty waived?</b>	No

**Amount Waived:**

<b>Regulator Statement</b>	WITHOUT ADMITTING OR DENYING THE FINDINGS, FERRANTE 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 FIVE BUSINESS DAYS. THE SUSPENSION IS IN EFFECT FROM DECEMBER 2, 2013 THROUGH DECEMBER 6, 2013. FINE PAID IN FULL ON NOVEMBER 20, 2013.
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<b>Reporting Source:</b>	Individual
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A



<b>Date Initiated:</b>	11/01/2013
<b>Docket/Case Number:</b>	<a href="#">2011026450201</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
<b>Product Type:</b>	No Product
<b>Allegations:</b>	FINRA RULE 2010: WHILE REGISTERED WITH NORTHWESTERN MUTUAL INVESTMENT SERVICES AND IN ANTICIPATION OF HIS MOVE TO A NEW FIRM, FERRANTE MOVED DOCUMENTS RELATED TO FIRM CUSTOMERS HE SERVICED FROM HIS FIRM OFFICE TO HIS HOME. THE DOCUMENTS CONTAINED NONPUBLIC PERSONAL INFORMATION, INCLUDING, AMONG OTHER THINGS, CUSTOMERS' ASSET AND INCOME INFORMATION, HEALTH INFORMATION, ADDRESSES, BIRTHDATES, AND EMPLOYMENT INFORMATION. FERRANTE MOVED THESE DOCUMENTS WITHOUT FIRM AUTHORIZATION AND IN CONTRAVENTION OF HIS FIRM'S POLICIES. BY REMOVING THE CUSTOMERS' FILES FROM HIS FIRM'S CONTROL AND POSSESSION, FERRANTE PLACED THE CUSTOMERS' NONPUBLIC PERSONAL INFORMATION AT RISK.
<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>	11/01/2013
<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>	ANY CAPACITY
<b>Duration:</b>	FIVE BUSINESS DAYS
<b>Start Date:</b>	12/02/2013
<b>End Date:</b>	12/06/2013
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$5,000.00
<b>Portion Levied against individual:</b>	\$5,000.00
<b>Payment Plan:</b>	
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	



**Was any portion of penalty waived?**

No

**Amount Waived:**

**Broker Statement**

WITHOUT ADMITTING OR DENYING THE FINDINGS, FERRANTE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS. THEREFORE, HE WAS FINED \$5,000 AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR FIVE BUSINESS DAYS. THE SUSPENSION IS IN EFFECT FROM DECEMBER 2, 2013 THROUGH DECEMBER 6, 2013.



### 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:** Discharged

**Termination Date:** 01/18/2011

**Allegations:** REPRESENTATIVE WAS DISCHARGED AFTER HE ENTERED THE OSJ AFTER-HOURS WITHOUT ANY APPARENT LEGITIMATE BUSINESS PURPOSE AND REMOVED CONFIDENTIAL AND PROPRIETARY DOCUMENTS.

**Product Type:** No Product

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**Reporting Source:** Individual

**Firm Name:** NORTHWESTERN MUTUAL

**Termination Type:** Discharged

**Termination Date:** 01/18/2011

**Allegations:** REPRESENTATIVE WAS DISCHARGED AFTER HE ENTERED THE OSJ AFTER-HOURS WITHOUT ANY APPARENT LEGITIMATE BUSINESS PURPOSE AND REMOVED CONFIDENTIAL AND PROPRIETARY DOCUMENTS

**Product Type:** No Product

**Broker Statement**

SPECIFICALLY MY AGENT CONTRACT WITH NORTHWESTERN MUTUAL MADE CLEAR THAT AS AN AGENT, I AM FREE TO EXERCISE MY OWN JUDGMENT (SECTION 4: RELATIONSHIP) AND DETERMINE THE TIME, PLACE AND MANNER OF MY CONDUCT. MOREOVER, SECTION 11: RECORDS OF THE AGENT CONTRACT EXPRESSLY STATES THAT IT IS MY RESPONSIBILITY TO "HOLD AND PRESERVE ALL RECORDS RELATING TO TRANSACTIONS BY OR FOR NORTHWESTERN MUTUAL." THUS THE AGENT CONTRACT MAKES IT CLEAR THAT I WAS PERMITTED TO CONDUCT BUSINESS AT ANY TIME OF DAY, INCLUDING "AFTER HOURS" AND THAT NOT ONLY WAS I ENTITLED TO POSSESS FILES RELATING TO TRANSACTIONS CONDUCTED FOR THE BENEFIT OF NORTHWESTERN MUTUAL, BUT I WAS OBLIGATED TO HOLD THESE FILES AND ENSURE THAT THEY ARE IN GOOD ORDER.

ALTHOUGH THERE DO NOT APPEAR TO BE ANY PROVISIONS THAT RESTRICTED MY ACCESS TO THE OSJ TO "LEGITIMATE BUSINESS PURPOSES" ONLY, THE FORM U5 DISCLOSURE NONETHELESS IMPLIES THAT MY CONDUCT WAS NOT LEGITIMATE. IF THERE WERE QUESTIONS REGARDING THE BUSINESS PURPOSE OF MY VISIT TO THE OFFICE, THEN THE APPROPRIATE PERSONNEL SHOULD HAVE INQUIRED AND I WOULD HAVE CLEARED UP THE CONFUSION. I BELIEVE THAT NMIS PURPOSEFULLY DID NOT MAKE THESE REASONABLE INQUIRIES NOR DID THEY REVIEW THE APPLICABLE CONTRACTS. RATHER, THE U5 DISCLOSURE SEEMS TO BE CONSISTENT WITH THE OTHER RETALIATORY EFFORTS OF NMIS, THE RUSSO GROUP AND NORTHWESTERN MUTUAL. IN THE MONTHS LEADING UP TO MY TERMINATION FROM NMIS, I HAD BEEN HONEST ABOUT MY CONVERSATIONS WITH COMPETING AGENCIES



AND MY THOUGHTS ABOUT LEAVING IF CERTAIN THINGS DID NOT IMPROVE. AS YOU CAN UNDERSTAND, A LOT GOES INTO A DECISION TO CHANGE AGENCIES, INCLUDING THE NEED TO UNDERSTAND THE LEVEL OF COMMISSIONS BEING LEFT BEHIND AND THE DESIRE TO ENSURE THAT IF I DID DEPART, THAT CLIENT FILES WERE COMPLETE AND THAT CLIENTS WOULD NOT BE IMPAIRED BY MY CAREER CHOICES. AT THE TIME I WAS TERMINATED, I HAD NOT YET FINALIZED MY DECISION REGARDING MY FUTURE WITH THE RUSSO GROUP; MY TERMINATION MADE THE DECISION FOR ME.

AT THE TIME I WAS TERMINATED, NORTHWESTERN MUTUAL DEMANDED THAT I RETURN THE CLIENT FILES THEN IN MY POSSESSION. ALTHOUGH THE OPERABLE AGREEMENTS DO NOT SPECIFY THE TIME PERIOD WITHIN WHICH THIS RETURN OF FILES NEEDED TO OCCUR, I RETURNED THE FILES WITHIN FOUR BUSINESS DAYS OF THE DEMAND TO DO SO, WHICH IS REASONABLE. OVER THE YEARS I HAVE KNOWN MANY AGENTS WHO LEFT THE RUSSO GROUP AND OPENLY TOOK CLIENT FILES WITH THEM WITHOUT ANY PROBLEMS. I HAVE CLEARLY BEEN SINGLED OUT FOR ADVERSE TREATMENT AS THESE INDIVIDUALS WERE NOT TREATED THE WAY I HAVE BEEN TREATED NOR DID THEY HAVE SIMILAR ENTRIES ON THEIR U5.

I WOULD ALSO LIKE TO POINT OUT THAT THE RUSSO GROUP UNILATERALLY TERMINATED MY STATUS AS A NORTHWESTERN MUTUAL AGENT WITHOUT ADVANCE NOTICE, DESPITE THE FACT THAT MY ACTIONS WERE ENTIRELY WITHIN THE SCOPE OF MY AGENT CONTRACT, AND CONSISTENT WITH PAST PRACTICE. BY DOING SO, THE RUSSO GROUP BREACHED THE AGENT CONTRACT, WHICH ONLY PERMITS IMMEDIATE TERMINATION FOR CAUSE, SUCH AS THE FAILURE OF AN AGENT TO COMPLY WITH THE TERMS OF THE AGENT CONTRACT. I SHOULD HAVE BEEN AFFORDED THE 30 DAYS REQUIRED BY THE AGENT CONTRACT, WHICH ALSO WOULD HAVE ALLOWED ME TO COLLECT COMMISSIONS GENERATED DURING THIS PERIOD. THESE ACTIONS ARE CURRENTLY THE SUBJECT OF CONVERSATIONS BETWEEN MYSELF AND NORTHWESTERN MUTUAL AND MAY ESCALATE.

DURING MY CAREER, I HAVE PRIDED MYSELF ON MY ETHICAL AND STRAIGHTFORWARD DEALINGS. I RESPECTFULLY REQUEST THAT YOU CONSIDER THE FACTS AT PLAY HERE AS WELL AS THE MOTIVATIONS OF THE RUSSO GROUP AND NMIS IN ATTEMPTING TO DARKEN MY OTHERWISE PRISTINE BUSINESS CONDUCT RECORD.



## End of Report

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