



IAPD Report

COLE FLEMING

CRD# 5912786

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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

COLE FLEMING (CRD# 5912786)

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 **11/07/2025**.

CURRENT EMPLOYERS

| | Firm | CRD# | Registered Since |
|-----------|------------------------|----------|------------------|
| B | EQUITY SERVICES, INC. | CRD# 265 | 02/14/2012 |
| IA | ESI FINANCIAL ADVISORS | CRD# 265 | 06/22/2021 |

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 |
|------|------|----------|--------------------|
|------|------|----------|--------------------|

No information reported.

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 | 2 |
| Judgment/Lien | 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 7 jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **ESI FINANCIAL ADVISORS**
Main Address: ONE NATIONAL LIFE DRIVE
MONTPELIER, VT 05604
Firm ID#: 265

| Regulator | Registration | Status | Date |
|-------------------------|-----------------------------------|----------|------------|
| B FINRA | Invest. Co and Variable Contracts | Approved | 02/14/2012 |
| B California | Agent | Approved | 10/19/2021 |
| B Florida | Agent | Approved | 03/30/2020 |
| B Maine | Agent | Approved | 11/12/2020 |
| B New Jersey | Agent | Approved | 03/12/2024 |
| B New York | Agent | Approved | 02/14/2012 |
| IA New York | Investment Adviser Representative | Approved | 06/22/2021 |
| B North Carolina | Agent | Approved | 08/17/2021 |
| B South Carolina | Agent | Approved | 02/08/2017 |

Branch Office Locations

ESI FINANCIAL ADVISORS
410 MOTOR PARKWAY
2ND FLOOR
HAUPPAUGE, NY 11788



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 |
|------|----------|------|
|------|----------|------|

| | | |
|--|----------|------------|
| Securities Industry Essentials Examination (SIE) | SIE | 10/01/2018 |
| Investment Company Products/Variable Contracts Representative Examination (S6) | Series 6 | 02/02/2012 |

State Securities Law Exams

| Exam | Category | Date |
|------|----------|------|
|------|----------|------|

| | | |
|--|-----------|------------|
| Uniform Securities Agent State Law Examination (S63) | Series 63 | 02/13/2012 |
|--|-----------|------------|

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:



No information reported.

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 |
|-------------------|-----------------------|----------------|--------------------|------------------------------|
| 01/2012 - Present | EQUITY SERVICES, INC. | REGISTERED REP | Y | HAUPPAUGE, NY, United States |
| 02/2009 - Present | NATIONAL LIFE | AGENT | Y | HAUPPAUGE, 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.

*LIFE LEGACY CONCEPTS. 410 MOTOR PARKWAY, 2ND FLOOR, HAUPPAUGE, NY 11788. INV REL. MARCH 2022. FIXED INS SALES. AGENT. AGENT TO SELL FIXED LIFE INS, HEALTH, DI, AND LTC WITH VARIOUS CARRIERS. DURING TRADE HRS. *EASTERN ADVISORY GROUP. 410 MOTOR PARKWAY, 2ND FLOOR, HAUPPAUGE, NY 11788. AUG 2025. INV REL. FIXED INSURANCE. AGENT. SELL FIXED INSURANCE PRODUCTS THROUGH VARIOUS CARRIERS. DURING TRADE HRS.



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 | 2 |
| Judgment/Lien | 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 2

| | |
|--|---|
| Reporting Source: | Individual |
| Regulatory Action Initiated By: | New York State Department of Financial Services |
| Sanction(s) Sought: | Civil and Administrative Penalty(ies)/Fine(s) |
| Date Initiated: | 10/06/2025 |
| Docket/Case Number: | 2025-0246-S |
| Employing firm when activity occurred which led to the regulatory action: | Equity Services Inc |
| Product Type: | No Product |
| Allegations: | NYDFS alleged that Mr. Fleming demonstrated untrustworthiness and/or incompetence within the meaning of Section 2110(a)(4)(B)-(C) of the Insurance Law in that Mr. Fleming's relicensing application to act as an agent pursuant to Section 2103(a) of the Insurance Law, certified and submitted to the Department on or about May 30,2023, contained false and/or inaccurate information in connection with Mr. Fleming having completed fifteen hours of Continuing Education, when in fact Mr. Fleming had not taken the required courses, in violation of Section 2132(g) of Insurance Law |
| Current Status: | Final |
| Resolution: | Stipulation and Consent |



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: 10/06/2025

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

Monetary Sanction 1 of 1

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

Total Amount: \$7,500.00

Portion Levied against individual: \$7,500.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 10/03/2025

Was any portion of penalty waived? No

Amount Waived:

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 07/31/2024

Docket/Case Number: [2024081399001](#)

Employing firm when activity occurred which led to the regulatory action: Equity Services Inc.

Product Type: No Product

Allegations: Without admitting or denying the findings, Flemming consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 15 hours of continuing education required to renew his state insurance license when, in fact, another person had completed that continuing education on his behalf.

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: | 07/31/2024 |
| 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: All Capacities
Duration: One month
Start Date: 08/19/2024
End Date: 09/18/2024

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: 04/10/2025
Was any portion of penalty waived? No

Amount Waived:

.....
Reporting Source: Individual
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Other: N/A
Date Initiated: 07/31/2024
Docket/Case Number: 2024081399001
Employing firm when activity occurred which led to the regulatory action: Equity Services, Inc.



| | |
|---|---|
| Product Type: | No Product |
| Allegations: | Without admitting or denying the findings, Flemming consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 15 hours of continuing education required to renew his state insurance license when, in fact, another person had completed that continuing education on his behalf. |
| 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: | 07/31/2024 |
| Sanctions Ordered: | Civil and Administrative Penalty(ies)/Fine(s) Suspension |
| Sanction 1 of 1 | |
| Sanction Type: | Suspension |
| Capacities Affected: | All Capacities |
| Duration: | One month |
| Start Date: | 08/19/2024 |
| End Date: | 09/18/2024 |
| 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: | |
| Was any portion of penalty waived? | No |
| Amount Waived: | |



Judgment/Lien

This disclosure event involves an unsatisfied and outstanding judgment or lien against the Investment Adviser Representative.

Disclosure 1 of 1

| | |
|-----------------------------------|--------------------------|
| Reporting Source: | Individual |
| Judgment/Lien Holder: | IRS |
| Judgment/Lien Amount: | \$260,846.95 |
| Judgment/Lien Type: | Tax |
| Date Filed with Court: | 01/06/2022 |
| Date Individual Learned: | 01/12/2022 |
| Type of Court: | IRS |
| Name of Court: | INTERNAL REVENUE SERVICE |
| Location of Court: | UNITED STATES |
| Judgment/Lien Outstanding? | Yes |



End of Report

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