## IAPD Report

# JEFFREY PETER MORAND

CRD# 728191



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

## JEFFREY PETER MORAND (CRD# 728191)

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 **07/07/2026**.

## CURRENT EMPLOYERS

This individual is not currently registered as an Investment Adviser Representative.

## QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and 0 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 | INDEPENDENT FINANCIAL GROUP, LLC | 7717 | Englewood, CO | 01/02/2019 - 07/07/2026 |
| IA | RICE BROWN FINANCIAL SERVICES | 148312 | ENGLEWOOD, CO | 08/30/2013 - 12/31/2019 |
| IA | UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER | 20804 | ENGLEWOOD, CO | 08/19/2008 - 08/15/2013 |

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 |
|---|---|
| Criminal | 1 |
| Customer Dispute | 6 |

 

# 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 **0** jurisdiction(s) and 0 SRO(s) through his or her employer(s).

### Employment 1 of 1

| | |
|---|---|
| Firm Name: | **SAN BLAS SECURITIES LLC** |
| Main Address: | 233 S WACKER DR<br>SUITE 4400<br>CHICAGO, IL 60606 |
| Firm ID#: | 290605 |

### Branch Office Locations

6500 South Quebec Street Suite 300
Englewood, CO 80111

 

# 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, 0 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 |
|---|---|---|
| No information reported. | | |

### State Securities Law Exams

| | Exam | Category | Date |
|---|---|---|---|
| IA | Uniform Investment Adviser Law Examination (S65) | Series 65 | 11/10/1997 |

## 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.

 

# 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 | 01/02/2019 - 07/07/2026 | INDEPENDENT FINANCIAL GROUP, LLC | CRD# 7717 | Englewood, CO |
| IA | 08/30/2013 - 12/31/2019 | RICE BROWN FINANCIAL SERVICES | CRD# 148312 | ENGLEWOOD, CO |
| IA | 08/19/2008 - 08/15/2013 | UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER | CRD# 20804 | ENGLEWOOD, CO |
| IA | 06/29/2007 - 08/28/2008 | HEARTLAND FINANCIAL CONSULTANTS | CRD# 113511 | CENTENNIAL, CO |
| IA | 10/12/2000 - 05/23/2007 | ING FINANCIAL PARTNERS, INC | CRD# 2882 | ENGLEWOOD, CO |

## 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 |
|---|---|---|---|---|
| 06/2023 - Present | JP Morand Success Coach | Independent Contractor | N | Englewood, CO, United States |
| 01/1999 - Present | JPM RENTAL PROPERTY | OWNER OF RENTAL PROPERTY | Y | ENGLEWOOD, CO, United States |
| 01/1981 - Present | J P MORAND & COMPANY | SELF-EMPLOYED / INSURANCE AGENT | Y | ENGLEWOOD, CO, United States |
| 01/2019 - 07/2026 | INDEPENDENT FINANCIAL GROUP | REGISTERED REPRESENTATIVE | Y | ENGLEWOOD, CO, United States |
| 01/2004 - 12/2025 | COLLEGE FUNDING COACH.COM | OWNER | N | ENGLEWOOD, CO, United States |
| 08/2013 - 12/2018 | RICE BROWN FINANCIAL SERVICES | ADVISOR | Y | ENGELWOOD, CO, United States |
| 08/2008 - 12/2018 | UNITED PLANNERS' FINANCIAL SERVICES | REG REP | Y | SCOTTSDALE, AZ, 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) INSURANCE AGENT

# Registration & Employment History

## OTHER BUSINESS ACTIVITIES

POSITION: Agent/Representative NATURE: Insurance outside of IFG INVESTMENT RELATED: Yes NUMBER OF HOURS: 20 SECURITIES TRADING HOURS: 20 START DATE: 01/01/1981
ADDRESS: 6500 South Quebec Street, Suite 300, Englewood CO 80111, United States
DESCRIPTION: CO INSURANCE AGENT PROVIDNG VARIOUS TYPES OF INSURANCE

(2) RENTAL PROPERTY
POSITION: Owner NATURE: Real Estate Sales/Rental Properties/Property Management INVESTMENT RELATED: Yes NUMBER OF HOURS: 1 SECURITIES TRADING HOURS: 1 START DATE: 01/01/2000
ADDRESS: 6500 South Quebec Street, Suite 300, Englewood CO 80111, United States
DESCRIPTION: 100% RENTAL PROPERTY OWNER

(3) JP MORAND & COMPANY
POSITION: Officer/Director NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: No NUMBER OF HOURS: 100 SECURITIES TRADING HOURS: 50 START DATE: 01/01/1981
ADDRESS: 6500 South Quebec Street, Suite 300, Englewood CO 80111, United States
DESCRIPTION: 50% OWNER OF DBA JP MORAND & COMPANY USED FOR MARKETING PURPOSES SINCE 1980. INVESTMENT RELATED. 99% OF TIME SPENT. BUSINESS CONDUCTED AT ADDRESS OF RECORD.

(4) JP MORAND SUCCESS COACH
POSITION: Independent Contractor NATURE: Consulting Services INVESTMENT RELATED: No NUMBER OF HOURS: 20 SECURITIES TRADING HOURS: 20 START DATE: 06/19/2023
ADDRESS: 6500 South Quebec Street, Suite 300, Englewood CO 80111, United States
DESCRIPTION: Success coach:
Guide and supports individuals and businesses in achieving their personal and professional goals. Provide guidance, motivation, goal setting and marketing plans to help meet those personal and business goals.
And to help blend personal and business goals to complement each other.

(5) JP MORAND & COMPANY THE CENTER FOR RETIREMENT READINESS
POSITION: Marketing purposes. Clients and prospects. NATURE: DBA Name for Marketing Purposes Only INVESTMENT RELATED: No NUMBER OF HOURS: 5 SECURITIES TRADING HOURS: 5 START DATE: 12/19/2025
ADDRESS: 6500 So Quebec St, Suite 300, Englewood CO 80111, United States
DESCRIPTION: Agreement to be able to use the logo and name for marketing purposes.
Only duties or responsibilities will be to not change the name or logo in any way. And be respectful to the meaning and purpose..

# 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*.
    - o A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
    - o A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
    - o 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*.
    - o 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.
    - o 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.
    - o 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 |
| --- | --- |
| Criminal | 1 |
| Customer Dispute | 6 |

### Criminal

This disclosure event involves a criminal charge against the Investment Adviser Representative that has resulted in a dismissal, plea, acquittal or conviction. The criminal matter may relate to any felony or certain misdemeanor offenses (e.g., bribery, perjury, forgery, counterfeiting, extortion, fraud, wrongful taking of property).

#### Disclosure 1 of 1

| | |
| --- | --- |
| **Reporting Source:** | Individual |
| **Court Details:** | STATE OF CALIFORNIA, NORTH ORANGE COUNTY MUNICIPAL COURT/CALIF. DEPARTMENT OF INSURANCE NF8800385; DR # 88F01497 |
| **Charge Date:** | 04/11/1988 |
| **Charge Details:** | SECTION 556(A)(2)CALIFORNIA INSURANCE CODE (FILING MULTIPLE INSURANCE CLAIMS). TOTAL AMOUNT OF CLAIMS WAS $15,135.75. SECTION 487.1, CALIFORNIA PENAL CODE (FELONY, GRAND THEFT, 1 COUNT). BOTH CHARGES RELATED TO THE SAME ALLEGED EVENT. |
| **Felony?** | Yes |
| **Current Status:** | Final |
| **Status Date:** | 07/18/1988 |
| **Disposition Details:** | PLEADED GUILTY TO SECTION 602(J) OF THE CALIFORNIA PENAL CODE (MISDEMEANOR TRESPASSING). I WAS ORDERED TO PAY $3,000 IN COURT COSTS AND REPAY $7,035.75 TO PRUDENTIAL INSURANCE CO. AND $8,100 TO TRAVELERS INSURANCE CO. I WAS PLACED ON THREE YEARS SUMMARY PROBATION AND ORDERED TO REFRAIN FROM VIOLATING ANY LAWS ON 4/2/1986. |
| **Broker Statement** | MY CAR WAS BURGLARIZED AND OVER $20,000 IN PROPERTY WAS STOLEN. I FILED CLAIMS ON MORE THAN ONE POLICY AS I EXPECTED PARITAL COVERAGE ON EACH. THE TOTAL I RECEIVED WAS LESS THAN MY LOSS. I HAD NO INTENTION TO DEFRAUD AND DO NOT BELIEVE THAT CRIMINAL INTENT COULD HAVE BEEN PROVEN. DUE TO THE MOUNTIN COSTS AND LOSS OF TIME FROM MY EMPLOYMENTS, I AGREED TO PLEAD GUILTY TO MISDEMEANOR TRESPASSING. |

## 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 6

| | |
|---|---|
| **Reporting Source:** | Firm |
| **Employing firm when activities occurred which led to the complaint:** | UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER |
| **Allegations:** | Breach of fiduciary duty, suitability, Securities Act, common law fraud and common law negligence, violation of FINRA Rule 2210, violation of FINRA rules 2010, IM-2310-2, and 2020, fraudulent misrepresentations and omissions, and breach of contract. |
| **Product Type:** | Other: Alternative Investment |
| **Alleged Damages:** | $0.00 |
| **Alleged Damages Amount Explanation (if amount not exact):** | No alleged damage amount specified and firm determined amount may exceed $5,000.00. |
| **Is this an oral complaint?** | No |
| **Is this a written complaint?** | Yes |
| **Is this an arbitration/CFTC reparation or civil litigation?** | Yes |
| **Arbitration/Reparation forum or court name and location:** | FINRA |
| **Docket/Case #:** | 22-00722 |
| **Filing date of arbitration/CFTC reparation or civil litigation:** | 04/01/2022 |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 04/08/2022 |
| **Complaint Pending?** | No |
| **Status:** | Settled |
| **Status Date:** | 06/22/2023 |
| **Settlement Amount:** | $170,000.00 |
| **Individual Contribution Amount:** | $0.00 |
| **Firm Statement** | [REDACTED] and [REDACTED] are the only customers named that are a clients of Jeffrey Morand. |

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| | |
|---|---|
| **Reporting Source:** | Individual |

 

| | |
|---|---|
| **Employing firm when activities occurred which led to the complaint:** | UNITED PLANNERS' FINANCIAL SERVICES OF AMERICA A LIMITED PARTNER 4. |
| **Allegations:** | Breach of fiduciary duty, suitability, Securities Act, common law fraud and common law negligence, violation of FINRA Rule 2210, violation of FINRA rules 2010, IM-2310-2, and 2020, fraudulent misrepresentations and omissions, and breach of contract |
| **Product Type:** | Other: Alternative Investment |
| **Alleged Damages:** | $0.00 |
| **Alleged Damages Amount Explanation (if amount not exact):** | No alleged damage amount specified and firm determined amount may exceed $5,000.00. |
| **Is this an oral complaint?** | No |
| **Is this a written complaint?** | Yes |
| **Is this an arbitration/CFTC reparation or civil litigation?** | Yes |
| **Arbitration/Reparation forum or court name and location:** | FINRA |
| **Docket/Case #:** | 22-00722 |
| **Filing date of arbitration/CFTC reparation or civil litigation:** | 04/01/2022 |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 04/08/2022 |
| **Complaint Pending?** | No |
| **Status:** | Settled |
| **Status Date:** | 06/22/2023 |
| **Settlement Amount:** | $170,000.00 |
| **Individual Contribution Amount:** | $0.00 |
| **Broker Statement** | Class action attorneys allege that I , United Planners (my former broker dealer ), and many, many others that represented Atlas Oil & Gas program violated FINRA rule 2210 & 2020 which reads in part: common law fraud, common law negligence, fraudulent misrepresentations and omissions and breach of contract. I categorically disagree that I misrepresented Atlas Oil and Gas Growth Partners in any way. I did not attempt in any way to defraud or neglect or misrepresent any of the material facts of the investment. I presented all the appropriate fact sheets from the Atlas and information that was provided to me by United Planners my broker dealer at the time in presenting the Atlas Oil & Gas program, I presented a current prospectus, fact sheets, brochures, Atlas website and information provided to me from my Atlas wholesaler. (Notes can be provided upon request) Before investing I went through all the suitability questions with the client and had client initial or sign where appropriate those questions in the subscription documents. Acknowledging risks, liquidity, and lack of direct management. Client and I talked on more than one occasion as to the volatility of the oil & gas market, the uncertainty of drilling, and production of the various oil wells that were included in the portfolio. |

### Disclosure 2 of 6

| | |
|---|---|
| **Reporting Source:** | Firm |
| **Employing firm when activities occurred which led to the complaint:** | ING FINANCIAL PARTNERS |
| **Allegations:** | THE CLIENTS ALLEGE THE REP INVESTED THEM IN THE WRONG FUND FOR THEIR JACKSON NATIONAL LIFE VARIABLE ANNUITY. THEY STATE THE REP HAS ACKNOWLEDGED THIS MISTAKE AND REQUEST THAT CORRECTIONS BE MADE TO MAKE THEIR ACCOUNT WHOLE AGAIN. THE CONTRACT WAS SOLD IN NOVEMBER 2004. |
| **Product Type:** | Annuity-Variable |
| **Alleged Damages:** | $0.00 |
| **Alleged Damages Amount Explanation (if amount not exact):** | THE CLIENT DOESN'T ALLEGE A SPECIFIC DAMAGE AMOUNT, BUT THE FIRM CANNOT MAKE A GOOD FAITH DETERMINATION THAT DAMAGES WON'T EXCEED $5,000. |
| **Is this an oral complaint?** | No |
| **Is this a written complaint?** | Yes |
| **Is this an arbitration/CFTC reparation or civil litigation?** | No |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 09/30/2009 |
| **Complaint Pending?** | No |
| **Status:** | Closed/No Action |
| **Status Date:** | 10/28/2009 |
| **Settlement Amount:** | |
| **Individual Contribution Amount:** | |

| | |
|---|---|
| **Reporting Source:** | Individual |
| **Employing firm when activities occurred which led to the complaint:** | ING FINANCIAL PARTNERS |
| **Allegations:** | REPRESENTATIVE INDICATED A GUARANTEED MINIMUM WITHDRAW BENEFIT (GMWB)RIDER ON THE APPLICATION INSTEAD OF A GUARANTEED MINIMUM INCOME BENEFIT (GMIB) ON A JACKSON NATIONAL LIFE - VARIABLE ANNUITY CONTRACT IN 2004 |
| **Product Type:** | Annuity-Variable |
| **Alleged Damages:** | $8,100.00 |
| **Alleged Damages Amount Explanation (if amount not exact):** | VALUE FLUCTUATES WITH THE MARKET. HOWEVER, OUR GOOD FAITH DETERMINATION INDICATES VALUE TO BE OVER $5000 CURRENTLY |
| **Is this an oral complaint?** | No |

 

| | |
|---|---|
| **Is this a written complaint?** | Yes |
| **Is this an arbitration/CFTC reparation or civil litigation?** | No |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 09/08/2009 |
| **Complaint Pending?** | No |
| **Status:** | Closed/No Action |
| **Status Date:** | 10/28/2009 |
| **Settlement Amount:** | |
| **Individual Contribution Amount:** | |
| **Broker Statement** | MATTER IS BEING HANDLED BY ING FINANCIAL PARTNERS AND JACKSON NATIONAL LIFE |

### Disclosure 3 of 6

| | |
|---|---|
| **Reporting Source:** | Firm |
| **Employing firm when activities occurred which led to the complaint:** | ING FINANCIAL PARTNERS, INC. |
| **Allegations:** | CUSTOMERS ALLEGE THEY PURCHASED FOUR VARIABLE ANNUITIES IN GOOD FAITH BASED ON THE REPRESENTATIVE'S GUIDANCE, RECOMMENDATION, EXPERTISE AND EXPLANATION AND HE MISREPRESENTED THESE VARIABLE ANNUITIES HE SOLD THEM. SPECIFICALLY, CUSTOMERS EXPRESSED SHOCK AND DISAPPOINTMENT WHEN TOLD BY THE ISSUING INSURANCE COMPANY THAT THEIR VARIABLE ANNUITIES WERE NOT WHAT THE REPRESENTATIVE SAID THEY WERE AND THE WAY REPRESENTATIVE EXPLAINED THE 6% AND LOCKING IN PREVIOUS GROWTH WAS WRONG. CUSTOMERS ARE REQUESTING REIMBURSEMENT OF LOSSES RESULTING FROM THIS INACCURATE DESCRIPTION OF THE VARIABLE ANNUITY'S GUARANTEED MINIMUM INCOME BENEFIT RIDER. |
| **Product Type:** | Annuity(ies) - Variable |
| **Alleged Damages:** | $44,538.42 |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 07/28/2008 |
| **Complaint Pending?** | No |
| **Status:** | Denied |
| **Status Date:** | 09/04/2008 |
| **Settlement Amount:** | |
| **Individual Contribution Amount:** | |
| **Firm Statement** | THE FIRM INVESTIGATED THE CLIENT'S CONCERNS AND DID NOT FIND SUFFICIENT EVIDENCE TO SUPPORT THE ALLEGATIONS OR ANY WRONGDOING ON THE PART OF THE REPRESENTATIVE IN THIS MATTER. CONSEQUENTLY, THE FIRM DENIED THE ALLEGATIONS AND REQUEST FOR |

REIMBURSEMENT OF LOSSES.

| | |
|---|---|
| **Reporting Source:** | Individual |
| **Employing firm when activities occurred which led to the complaint:** | ING FINANCIAL PARTNER, INC. |
| **Allegations:** | CUSTOMERS ALLEGE THEY PURCHASED FOUR VARIABLE ANNUITIES IN GOOD FAITH BASED ON THE REPRESENTATIVE'S GUIDANCE, RECOMMENDATION, EXPERTISE AND EXPLANATION AND HE MISREPRESENTED THESE VARIABLE ANNUITIES HE SOLD THEM. SPECIFICALLY, CUSTOMERS EXPRESSED SHOCK AND DISAPPOINTMENT WHEN TOLD BY THE ISSUING INSURANCE COMPANY THAT THEIR VARIABLE ANNUITIES WERE NOT WHAT THE REPRESENTATIVE SAID THEY WERE AND THE WAY REPRESENTATIVE EXPLAINED THE 6% AND LOCKING IN PREVIOUS GROWTH WAS WRONG. CUSTOMERS ARE REQUESTING REIMBURSEMENT OF LOSSES RESULTING FROM THIS INACCURATE DESCRIPTION OF THE VARIABLE ANNUITY'S GUARANTEED MINIMUM INCOME BENEFIT RIDER. |
| **Product Type:** | Annuity(ies) - Variable |
| **Alleged Damages:** | $44,538.42 |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 07/28/2008 |
| **Complaint Pending?** | No |
| **Status:** | Denied |
| **Status Date:** | 09/04/2008 |
| **Settlement Amount:** | |
| **Individual Contribution Amount:** | |
| **Broker Statement** | THE FIRM INVESTIGATED THE CLIENT'S CONCERNS AND DID NOT FIND SUFFICIENT EVIDENCE TO SUPPORT THE ALLEGATIONS OR ANY WRONGDOING ON THE PART OF THE REPRESENTATIVE IN THIS MATTER. CONSEQUENTLY, THE FIRM DENIED THE ALLEGATIONS AND REQUEST FOR REIMBURSEMENT OF LOSSES. |

### Disclosure 4 of 6

| | |
|---|---|
| **Reporting Source:** | Individual |
| **Employing firm when activities occurred which led to the complaint:** | ING FINANCIAL PARTNERS INC |
| **Allegations:** | CLIENT IS COMLAINING ABOUT A PURCHASE OF A VUL, RECOMMENDED BY MR MORAND, ON OR AROUND 5/25/04. SHE CLAIMS THE VUL WAS UNSUITABLE FOR HER AND STATES THAT SHE THEREFORE DECIDED TO SURRENDER IT ON OR ABOUT 12/15/05, INCURRING $23814.22 IN SURRENDER CHARGES. THE CLIENT WANTS TO BE REIMBURSED IN AN AMOUNT EQUAL TO THE SURRENDER CHARGES THAT SHE INCURRED. |
| **Product Type:** | Options |
| **Other Product Type(s):** | VARIABLE UNIVERSAL LIFE |

 

**Alleged Damages:** $23,814.22

## Customer Complaint Information

**Date Complaint Received:** 01/23/2006

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 02/13/2006

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement** THE COMPLAINT WAS INVESTIGATED BY AN AFFILIATED THIRD-PARTY, THE ISSUING INSURANCE COMPANY, AND DENIED (ON 2/13/06). THE CLIENT WAS INFORMED THAT ADEQUATE DISCLOSURE OF SURRENDER CHARGES HAD BEEN PROVIDED AND THAT A FREE-LOOK OPPORTUNITY WAS AVAILABLE BUT NOT ELECTED.

### Disclosure 5 of 6

**Reporting Source:** Individual

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

**Allegations:** CUSTOMER CONTENDS THE REGISTERED REPRESENTATIVE FAILED TO FULLY EXPLAIN ALL OF THE RISKS AND CONSEQUENCES ASSOCIATED WITH INVESTING IN A VUL. POLICY ISSUED ON 1/14/03

**Product Type:** Annuity(ies) - Variable

**Other Product Type(s):** VUL

**Alleged Damages:** $25,836.32

## Customer Complaint Information

**Date Complaint Received:** 11/11/2004

**Complaint Pending?** No

**Status:** Denied

**Status Date:** 12/21/2004

**Settlement Amount:**

**Individual Contribution Amount:**

**Broker Statement** THE CLIENTS ALLEGATIONS WERE INVESTIGATED BY AN AFFILIATED THIRD PARTY AND WERE FOUND TO BE W/OUT MERIT

### Disclosure 6 of 6

**Reporting Source:** Individual

**Employing firm when activities occurred which led to the complaint:** WASHINGTON SQUARE SECURITIES, INC.

| | |
|---|---|
| **Allegations:** | ALLEGED UNSUITABLE RECOMMENDATION, DAMAGES ESTIMATED TO EXCEED $5,000. |
| **Product Type:** | Insurance |
| **Alleged Damages:** | $0.00 |

## Customer Complaint Information

| | |
|---|---|
| **Date Complaint Received:** | 07/22/2003 |
| **Complaint Pending?** | No |
| **Status:** | Denied |
| **Status Date:** | 09/05/2003 |
| **Settlement Amount:** | $0.00 |
| **Individual Contribution Amount:** | |
| **Broker Statement** | IN THEIR INVESTIGATION RELIASTAR LIFE INSURANCE COMPANY FOUND NO EVIDENCE TO SUPPORT ALLEGATIONS AND DENIED CLAIM. |

## End of Report

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