



IAPD Report

DANIEL EDWARD BRUNETTE

CRD# 813924

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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

DANIEL EDWARD BRUNETTE (CRD# 813924)

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 **04/28/2026**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	CETERA INVESTMENT ADVISERS LLC	CRD# 105644	11/12/2020
B	CETERA ADVISORS LLC	CRD# 10299	09/08/2022

QUALIFICATIONS

This representative is currently registered in **1** SRO(s) and **26** 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	FIRST ALLIED SECURITIES, INC.	32444	INDIANAPOLIS, IN	10/17/2012 - 09/08/2022
IA	FIRST ALLIED ADVISORY SERVICES, INC.	137888	INDIANAPOLIS, IN	10/18/2012 - 11/12/2020
IA	OGILVIE SECURITY ADVISORS CORP	10105	INDIANAPOLIS, IN	11/01/2002 - 10/24/2012

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	6
Customer Dispute	16
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 **26** jurisdiction(s) and 1 SRO(s) through his or her employer(s).

Employment 1 of 2

Firm Name: **CETERA ADVISORS LLC**
Main Address: 5299 DTC BLVD #800
GREENWOOD VILLAGE, CO 80111
Firm ID#: 10299

Regulator	Registration	Status	Date
B FINRA	General Securities Representative	Approved	09/08/2022
B FINRA	Invest. Co and Variable Contracts	Approved	09/08/2022
B FINRA	Operations Professional	Approved	09/08/2022
B Alabama	Agent	Approved	03/27/2026
B Arizona	Agent	Approved	04/20/2026
B Arkansas	Agent	Approved	04/08/2026
B California	Agent	Approved	03/27/2026
B Colorado	Agent	Approved	03/30/2026
B District of Columbia	Agent	Approved	03/30/2026
B Florida	Agent	Approved	03/30/2026
B Georgia	Agent	Approved	03/30/2026
B Illinois	Agent	Approved	03/30/2026
B Indiana	Agent	Approved	09/08/2022



Qualifications

Regulator	Registration	Status	Date
B Kentucky	Agent	Approved	03/30/2026
B Michigan	Agent	Approved	03/31/2026
B Minnesota	Agent	Approved	03/27/2026
B Missouri	Agent	Approved	03/27/2026
B Nevada	Agent	Approved	03/27/2026
B North Carolina	Agent	Approved	03/27/2026
B Ohio	Agent	Approved	03/27/2026
B Oklahoma	Agent	Approved	03/30/2026
B Pennsylvania	Agent	Approved	03/30/2026
B South Carolina	Agent	Approved	04/02/2026
B Tennessee	Agent	Approved	03/30/2026
B Texas	Agent	Approved	03/30/2026
B Utah	Agent	Approved	03/30/2026
B Virginia	Agent	Approved	05/05/2026
B Wisconsin	Agent	Approved	03/27/2026
B Wyoming	Agent	Approved	03/30/2026

Branch Office Locations

CETERA ADVISORS LLC
 9265 Counselors Row Suite 120
 INDIANAPOLIS, IN 46240

CETERA ADVISORS LLC
 FISHERS, IN

Employment 2 of 2



Qualifications

Firm Name: **CETERA INVESTMENT ADVISERS LLC**
Main Address: 1450 AMERICAN LANE
6TH FLOOR, SUITE 650
SCHAUMBURG, IL 60173-2096
Firm ID#: 105644

	Regulator	Registration	Status	Date
IA	Indiana	Investment Adviser Representative	Approved	11/12/2020
IA	Texas	Investment Adviser Representative	Restricted Approval	03/30/2026

Branch Office Locations

CETERA INVESTMENT ADVISERS LLC
9265 Counselors Row Suite 120
INDIANAPOLIS, IN 46240

CETERA INVESTMENT ADVISERS LLC
FISHERS, IN



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 1 principal/supervisory exam, 7 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
NYSE Branch Manager Examination (S12)	Series 12	12/29/1999

General Industry/Product Exams

Exam	Category	Date
Operations Professional Examination (S99TO)	Series 99TO	01/02/2023
Investment Company Products/Variable Contracts Representative Examination (S6TO)	Series 6TO	01/02/2023
Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
General Securities Representative Examination (S7)	Series 7	12/01/2003
Direct Participation Programs Representative Examination (S22)	Series 22	01/24/1983
Non-Member General Securities Examination (S2)	Series 2	01/24/1983
Registered Representative Examination (S1)	Series 1	10/21/1975

State Securities Law Exams

Exam	Category	Date
Uniform Investment Adviser Law Examination (S65)	Series 65	01/08/2000
Uniform Securities Agent State Law Examination (S63)	Series 63	01/24/1983



PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **2** professional designation(s).

Certified Financial Planner

Chartered Financial Consultant

This representative holds or did hold **2** professional designation(s) that may have been used to qualify as an Investment Advisor representative. Please check with the appropriate designation authority for verification that the designation is still in effect. The contact information for these professional designation authorities can be found on the website for the North American Securities Administrators Association at <http://www.nasaa.org>



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
B	10/17/2012 - 09/08/2022	FIRST ALLIED SECURITIES, INC.	CRD# 32444	INDIANAPOLIS, IN
IA	10/18/2012 - 11/12/2020	FIRST ALLIED ADVISORY SERVICES, INC.	CRD# 137888	INDIANAPOLIS, IN
IA	11/01/2002 - 10/24/2012	OGILVIE SECURITY ADVISORS CORP	CRD# 10105	INDIANAPOLIS, IN
B	08/06/2002 - 10/24/2012	OGILVIE SECURITY ADVISORS CORPORATION	CRD# 10105	INDIANAPOLIS, IN
B	10/28/1975 - 07/17/2002	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC	CRD# 2881	MILWAUKEE, WI
B	02/28/1987 - 01/01/2002	ROBERT W. BAIRD & CO. INCORPORATED	CRD# 8158	MILWAUKEE, WI
B	12/16/1986 - 01/13/1987	ROBERT W. BAIRD & CO. INCORPORATED	CRD# 8158	
B	09/24/1984 - 12/15/1986	VESTAX SECURITIES CORPORATION	CRD# 10332	
B	03/04/1983 - 10/11/1984	HALL SECURITIES CORPORATION	CRD# 13013	

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
02/2026 - Present	ARTISTIC STRATEGIES	Financial Professional	Y	Indianapolis, IN, United States
09/2022 - Present	CETERA ADVISORS LLC	REGISTERED REPRESENTATIVE	Y	ST CLOUD, MN, United States
11/2020 - Present	CETERA INVESTMENT ADVISERS LLC	INVESTMENT ADVISOR REPRESENTATIVE	Y	SCHAUMBURG, IL, United States
03/2020 - 01/2026	ARTISTRY WEALTH LLC;	CEO WEALTH MANAGER	Y	INDIANAPOLIS, IN, United States
07/2002 - 03/2025	BRUNETTE & ASSOCIATES	MEMBER	Y	INDIANAPOLIS, IN, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
10/2012 - 09/2022	FIRST ALLIED SECURITIES, INC.	FINANCIAL ADVISOR	Y	SAN DIEGO, CA, United States
09/2013 - 11/2020	FIRST ALLIED ADVISORY SERVICES, INC.	INVESTMENT ADVISOR REPRESENTATIVE	Y	SAN DIEGO, CA, 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 .DEB INV GROUP LLC; NO; INDY, IN; HOLDING CO MANAGING PASSIVE BUSINESS INTERESTS; 12/2002; 0 HRS; ESTABLISHED FOR ESTATE & INCOME TAX PURPOSES, 100% PASSIVE OWNER
- 2.DEB REAL ESTATE INV GROUP, LLC; NO; INDY, IN; HOLDING CO MANAGING PASSIVE R/E INTERESTS; 12/2002; 0 HRS; EST FOR ESTATE & INCOME TAX PURPOSES, 100% PASSIVE OWNER
3. SR 135, LLC; NO; SCOTTSDALE, AZ; OWN UNDEVELOPED LAND FOR COMMERCIAL DEVELOPMENT; 12/2002; 0 HRS; 100% MEM
4. WEST 56TH ST., LLC; NO; INDY, IN; OWN & DEVELOP LAND & COMMERCIAL PROPERTIES; 1996; 0 HRS; 50% PASSIVE OWNER
5. SI1, LLC; MEM; START DATE 01/01/07
6. NEW SESCO, INC.; MEM;OTHER; START DATE 07/01/99
7. GRAND VALLEY, LLC; MEM; OTHER; START DATE 01/01/1996
8. GENTRY PTRS, LTD;INDEPENDENT CONTRACTOR; INSURANCE;START DATE 07/01/02; 160 HRS. PER MONTH
9. D&G INVS, LP;PTR;OTHER;START DATE 09/01/95
10. ONE RESOURCE GROUP; INDEPENDENT CONTRACTOR;INSURANCE;START DATE 07/01/02; 160 HRS. PER MONTH
11. AMERICAN METAL COATINGS, INC.; OWNER; START DATE 03/01/99
12. DP ORCHARD CO.; START DATE 01/01/98
13. THE ACADEMY APTS LLC; MEM; OTHER; START DATE 05/1/98
14. SAXONY COURT ASSOCIATES, INC.; SHAREHOLDER; OTHER; START DATE 01/01/95
15. LIMIT DNE, LLC DBA MATHNASIUM; MEM; EDUCATION; START DATE 07/01/14; 4 HRS/MO.
16. SC RE GROUP; PTR; RE; START DATE 01/01/07; 4 HRS/MO
17. BEACON SOLUTIONS INC. - DBA (OWNED BY DEB INVS GROUP, LLC); MEM - EDUCATION/TRAINING; START DATE: 01/31/18; ZERO HRS/MO
18. NEWSPRING ACCEPTANCE; PTR; RE(RENTAL PROPERTY/PASSIVE INV); START DATE 04/01/18; 4 HRS/MO
19. SESCO GROUP HOLDING CO LLC; OWNER; CONSULTING; START DATE 01/01/19; 4 HRS/MO
20. PAD, LLC; COMMERCIAL BLDG; START DATE: 01/01/99; 0 HRS/MO
21. LYGOS INC; MEM; START DATE 04/01/12; 0 HRS/MO
22. SESCO GROUP COMPLIANCE; PTR; RE; START DATE: 01/01/19; 0 HRS/MO
23. SESCO GROUP HOLDING CO LLC; OWNER; CONSULTING; START DATE: 01/01/2019; 4 HRS/MO
24. BRUNETTE WEALTH ADVISORY, INC. OWNER; HOLDING CO OR TAX/BILL PAYMENT ENTITY; START DATE: 05/29/2019; 160 HOURS PER MONTH
25. SPORTSMAN UNITS LLC; PARTNER; HOLDING COMPANY OR TAX/BILL PAYMENT ENTITY; START DATE 05/21/2020; 0 HOURS PER MONTH
26. NAME OF OTHER BUSINESS: ARTISTIC STRATEGIES;
INVESTMENT RELATED: YES;
ADDRESS: SAME AS REGISTERED LOCATION;
NATURE OF BUSINESS: FINANCIAL SERVICES;



Registration & Employment History



OTHER BUSINESS ACTIVITIES

START DATE: 02/2026;
POSITION/TITLE/RELATIONSHIP: FINANCIAL PROFESSIONAL;
APX NUMBER OF HOURS PER WEEK: 40;
APX NUMBER OF HOURS DURING TRADING HOURS: 32.5;
BRIEF DESCRIPTION OF DUTIES: DBA FOR FINANCIAL AND INSURANCE SERVICES;



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	6
Customer Dispute	16
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 6

Reporting Source:	Individual
Regulatory Action Initiated By:	STATE OF INDIANA
Sanction(s) Sought:	
Other Sanction(s) Sought:	
Date Initiated:	06/23/2005
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	OGILVIE SECURITY ADVISORS CORP.
Product Type:	Insurance
Other Product Type(s):	
Allegations:	FAILURE TO NOTIFY THE STATE OF INDIANA OF A NASD ADMINISTRATIVE ACTION FOR SENDING FOUR LETTERS TO CLIENTS THAT DID NOT ACCURATELY REFLECT A VARIABLE COMPLIFE PRODUCT BEING OFFERED WITH THIRTY DAYS. THIS WAS STRICTLY AN OMISSION DUE TO IGNORANCE OF THE REQUIREMENT AND DID NOT INVOLVE ANY INDIVIDUAL FINDINGS WITHIN THE STATE OF INDIANA.
Current Status:	Final
Resolution:	Other
Resolution Date:	08/24/2005

**Sanctions Ordered:**

Other Sanctions Ordered: FINAL ORDER - ONE YEAR LICENSE PROBATIONARY STATUS PLACED ON MY PRODUCER LICENSE AND REQUIRED QUARTERLY REPORTS SUBMITTED BY MY COMPLIANCE OFFICER FOR ONE YEAR.

Sanction Details: FINAL ORDER - ONE YEAR LICENSE PROBATIONARY STATUS PLACED ON MY PRODUCER LICENSE AND REQUIRED QUARTERLY REPORTS SUBMITTED BY MY COMPLIANCE OFFICER FOR ONE YEAR.

Broker Statement I WAS UNAWARE OF THE REQUIREMENT TO INFORM DEPARTMENTS OF INSURANCE OF THE NASD RULING THAT STATED IN LETTERS TO FOUR CLIENTS THAT I HAD FAILED TO CLEARLY DESCRIBE THE PRODUCT AS A VARIABLE LIFE INSURANCE POLICY. ACTIONS TAKEN WERE NOT A RESULT OF ANY INDIVIDUAL COMPLAINT WITHIN ANY OF THE STATES. THERE WAS A SNOWBALLING EFFECT AS I SENT NOTIFICATION TO ALL THE STATES AS SOON AS I FOUND OUT THAT I WAS REQUIRED TO DO SO, BUT BY THEN DEFINITELY OUTSIDE OF THE 30 DAYS AVAILABLE TO DO SO IN A TIMELY MANNER, WHICH RESULTED IN SEVERAL STATES FINING ME.

Disclosure 2 of 6

Reporting Source: Individual

Regulatory Action Initiated By: STATE OF OHIO

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 11/03/2006

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action: OGILVIE SECURITY ADVISORS CORP.

Product Type: Insurance

Other Product Type(s):

Allegations: FAILURE TO REPORT TO THE DEPARTMENT (OHIO) THE STATE OF ILLINOIS, DEPARTMENT OF SECURITIES CONSENT ORDER DATED MAY 25, 2006

Current Status: Final

Resolution: Consent

Resolution Date: 12/06/2006

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered: \$400 CIVIL PENALTY AND \$100 FOR ADMINISTRATIVE COSTS. PROVIDE EACH OHIO INSURER WITH WHICH I WAS APPOINTED AND THE DEPARTMENT OF EACH STATE IN WHICH I WAS LICENSED WITH A COPY OF THE OHIO CONSENT ORDER WITHIN 60 DAYS.

Sanction Details: PROVIDE EACH OHIO INSURER WITH WHICH I WAS APPOINTED AND THE DEPARTMENT OF EACH STATE IN WHICH I WAS LICENSED WITH A COPY OF THE OHIO CONSENT ORDER WITHIN 60 DAYS.

Broker Statement I WAS UNAWARE OF THE REQUIREMENT TO INFORM DEPARTMENTS OF INSURANCE OF THE NASD RULING THAT STATED IN LETTERS TO FOUR CLIENTS THAT I HAD FAILED TO CLEARLY DESCRIBE THE PRODUCT AS A



VARIABLE LIFE INSURANCE POLICY. ACTIONS TAKEN WERE NOT A RESULT OF ANY INDIVIDUAL COMPLAINT WITHIN ANY OF THE STATES. THERE WAS A SNOWBALLING EFFECT AS I SENT NOTIFICATION TO ALL THE STATES AS SOON AS I FOUND OUT THAT I WAS REQUIRED TO DO SO, BUT BY THEN DEFINITELY OUTSIDE OF THE 30 DAYS AVAILABLE TO DO SO IN A TIMELY MANNER, WHICH RESULTED IN SEVERAL STATES FINING ME.

Disclosure 3 of 6

Reporting Source: Individual

Regulatory Action Initiated By: STATE OF WISCONSIN

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 01/25/2005

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action: OGILVIE SECURITY ADVISORS CORP.

Product Type: Insurance

Other Product Type(s):

Allegations: FAILURE TO NOTIFY THE STATE OF WISCONSIN (OCI) IN WRITING OF THE REGULATORY ACTION TAKEN BY THE NASD OCT. 5, 2004 FOR FAILING TO CLEARLY DESCRIBE A PRODUCT AS A VARIABLE LIFE INSURANCE POLICY

Current Status: Final

Resolution: Consent

Resolution Date: 01/26/2005

Sanctions Ordered: Cease and Desist/Injunction
Monetary/Fine \$1,000.00

Other Sanctions Ordered: CEASE AND DESIST FROM VIOLATION S. INS 6.60 AND S. INS 6.61 WIS ADMIN CODE

Sanction Details: CEASE AND DESIST FROM VIOLATION S. INS 6.60 AND S. INS 6.61 WIS ADMIN CODE

Broker Statement I WAS UNAWARE OF THE REQUIREMENT TO INFORM DEPARTMENTS OF INSURANCE OF THE NASD RULING THAT STATED IN LETTERS TO FOUR CLIENTS THAT I HAD FAILED TO CLEARLY DESCRIBE THE PRODUCT AS A VARIABLE LIFE INSURANCE POLICY. ACTIONS TAKEN WERE NOT A RESULT OF ANY INDIVIDUAL COMPLAINT WITHIN THE STATE OF WISCONSIN.

Disclosure 4 of 6

Reporting Source: Individual

Regulatory Action Initiated By: STATE OF PENNSYLVANIA

Sanction(s) Sought: Cease and Desist

Other Sanction(s) Sought: FINE OF \$1,000.00



Date Initiated:	08/01/2005
Docket/Case Number:	
Employing firm when activity occurred which led to the regulatory action:	OGILVIE SECURITY ADVISORS CORP.
Product Type:	Insurance
Other Product Type(s):	
Allegations:	FAILURE TO INFORM STATE OF PENNSYLVANIA OF A NASD ADMINISTRATIVE ACTION FOR SENDING FOUR CLIENTS THAT DID NOT ACCURATELY REFLECT A VARIABLE COMPLLIFE PRODUCT BEING OFFERED WITHIN 30 DAYS. THIS WAS STRICTLY AN OMISSION DUE TOIGNORANCE OF THE REQUIREMENT AND DID NOT INVOLVE ANY INDIVIDUAL FINDINGS WITHIN THE STATE OF PENNSYLVANIA,
Current Status:	Final
Resolution:	Consent
Resolution Date:	09/19/2006
Sanctions Ordered:	Cease and Desist/Injunction Monetary/Fine \$1,000.00
Other Sanctions Ordered:	ORDER TO CEASE AND DESIST FORM ENGAGING IN THE ACTIVITIES DESCRIBED IN THE FINDINGS OF FACT AND CONCLUSION OF LAW
Sanction Details:	ORDER TO CEASE AND DESIST FORM ENGAGING IN THE ACTIVITIES DESCRIBED IN THE FINDINGS OF FACT AND CONCLUSION OF LAW
Broker Statement	I WAS UNAWARE OF REQUIREMENT TO INFORM DEPTS. OF INSURANCE OF THE NASD RULING THAT STATED IN LETTERS TO FOUR CLIENTS, I FAILED TO CLEARLY DESCRIBE THE PRODUCT AS A VARIABLE LIFE INSURANCE POLICY. ACTIONS TAKEN WERE NOT A RESULT OF ANY INDIVIDUAL COMPLAINT WITHIN ANY OF THE STATES. THERE WAS A SNOWBALLING EFFECT AS I SENT NOTIFICATION TO ALL THE STATES AS SOON AS I FOUND OUT THAT I WAS REQUIRED TO DO SO, BUT I WAS BY THEN DEFINITELY OUTSIDE OF THE 30 DAYS AVAILABLE TO DO SO IN A TIMELY MANNER WHICH RESULTED IN SEVERAL STATES FINING ME.
Disclosure 5 of 6	
Reporting Source:	Regulator
Regulatory Action Initiated By:	ILLINOIS
Sanction(s) Sought:	Revocation
Other Sanction(s) Sought:	
Date Initiated:	05/25/2006
Docket/Case Number:	0400697
Employing firm when activity occurred which led to the regulatory action:	OGILVIE SECURITY ADVISORS CORPORATION
Product Type:	Other



Other Product Type(s):

Allegations: RESPONDENT'S REGISTRATION AS A SALESPERSON IN THE STATE OF ILLINOIS IS SUBJECT TO REVOCATION PURSUANT TO SECTION 8.E(1)(J) OF THE ILLINOIS SECURITIES LAW.

Current Status: Final

Resolution: 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: 05/25/2006

Regulator Statement CONSENT ORDER OF WITHDRAWEL FOR TWO(2) YEARS. ANY QUESTIONS CALL CHERYL WEISS @ 312-793-3324.

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Reporting Source: Individual

Regulatory Action Initiated By: ILLINOIS DEPARTMENT OF STATE - SECURITIES DEPARTMENT

Sanction(s) Sought: Revocation

Other Sanction(s) Sought: WITHDRAWAL OF REGISTRATION FOR 2 YEARS & \$1,000.00 FINE

Date Initiated: 10/26/2005

Docket/Case Number: 0400697

Employing firm when activity occurred which led to the regulatory action: OGILVIE SECURITY ADVISORS CORPORATION

Product Type: Insurance

Other Product Type(s):

Allegations: RESPONDENT'S REGISTRATION AS A SALESPERSON IN THE STATE OF ILLINOIS IS SUBJECT TO REVOCATION PURSUANT TO SECTION 8.E(1)(J) OF THE ILLINOIS SECURITIES LAW.

STATE OF ILLINOIS REQUIRED THAT I COME TO CHICAGO TO DISCUSS MY FAILURE TO INFORM THEM ON A TIMELY BASIS OF THE NASD FINDINGS. I ELECTED NOT TO GO AS I THOUGHT IT COULD BE HANDLED OVER THE PHONE.

Current Status: Final

Resolution: Consent

Resolution Date: 05/25/2006

Sanctions Ordered: Monetary/Fine \$1,000.00

Other Sanctions Ordered:

Sanction Details: CONSENT ORDER OF WITHDRAWL FOR TWO (2) YEARS. ANY QUESTIONS CALL CHERYL WEISS@312-793-3324.



FINED \$1,000.00 FOR ADMINISTRATIVE COSTS, WITHDRAWAL OF REGISTRATION RENEWAL FOR PERIOD OF TWO YEARS AT WHICH TIME I CAN REAPPLY.

Broker Statement

NOTICE OF HEARING ISSUED AND THE HEARING DATE IS SET FOR DECEMBER 14, 2005. ANY QUESTIONS CALL CHERYL WEISS @ 312.793.3324.

THIS ACTION WAS TAKEN SOLELY AS A RESULT OF MY FAILURE TO REPORT NASD FINDINGS OF 10/5/2004 IN WHICH THE NASD CONDUCT RULE 2110-2210 STATED THAT IN LETTERS TO FOUR CLIENTS, I FAILED TO CLEARLY DESCRIBE THE PRODUCT AS A VARIABLE LIFE INSURANCE POLICY. THE ACTION NOT DUE TO ANY INDIVIDUAL COMPLAINT WITHIN THE STATE OF ILLINOIS.

Disclosure 6 of 6

Reporting Source: Regulator

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Date Initiated: 10/05/2004

Docket/Case Number: CAF040075

Employing firm when activity occurred which led to the regulatory action: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Product Type: Annuity-Variable

Allegations: NASD CONDUCT RULE 2110 AND 2210 - DANIEL E. BRUNETTE IN LETTERS TO FOUR OF HIS CLIENTS FAILED TO CLEARLY DESCRIBE THE PRODUCT REFERENCED IN THE LETTERS AS A VARIABLE LIFE INSURANCE POLICY.

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: 10/05/2004

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

Regulator Statement

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, DANIEL E. BRUNETTE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS CENSURED, FINED \$10,000, AND SUSPENDED IN ALL CAPACITIES FOR FIVE BUSINESS DAYS. THE SUSPENSION WILL COMMENCE WITH THE OPENING OF BUSINESS ON OCTOBER 18, 2004 AND WILL CONCLUDE AT THE CLOSE OF BUSINESS ON OCTOBER 22, 2004. FINES PAID.



Reporting Source: Firm

Regulatory Action Initiated By: NASD

Sanction(s) Sought:

Other Sanction(s) Sought:

Date Initiated: 10/05/2004

Docket/Case Number: CAF040075

Employing firm when activity occurred which led to the regulatory action: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Product Type: Insurance

Other Product Type(s):

Allegations: NASD CONDUCT RULE 2110 AND 2210 - DANIEL E. BRUNETTE IN LETTERS TO FOUR OF HIS CLIENTS FAILED TO CLEARLY DESCRIBE THE PRODUCT REFERENCED IN THE LETTERS AS A VARIABLE LIFE INSURANCE POLICY.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/05/2004

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, DANIEL E. BRUNETTE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS CENSURED, FINED \$10,000, AND SUSPENDED IN ALL CAPACITIES FOR FIVE BUSINESS DAYS. THE SUSPENSION WILL COMMENCE WITH THE OPENING OF BUSINESS ON OCTOBER 18, 2004 AND WILL CONCLUDE AT THE CLOSE OF BUSINESS ON OCTOBER 22, 2004.

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Reporting Source: Individual

Regulatory Action Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Sanction(s) Sought: Suspension

Other Sanction(s) Sought:

Date Initiated: 10/05/2004

Docket/Case Number: CAF040075

Employing firm when activity occurred which led to the regulatory action: NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY

Product Type: Insurance

Other Product Type(s):



Allegations: NASD CONDUCT RULE 2110-2210-DANIEL E. BRUNETTE IS LETTERS TO FOUR OF HIS CLIENTS FAILED TO CLEARLY DESCRIBE THE PRODUCT REFERENCED IN THE LETTERS AS A VARIABLE LIFE INSURANCE POLICY.

Current Status: Final

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/05/2004

Sanctions Ordered: Monetary/Fine \$10,000.00
Suspension

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, DANIEL E. BRUNETTE CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS CENSURED, FINED \$10,000, AND SUSPENDED IN ALL CAPACITIES FOR FIVE BUSINESS DAYS. THE SUSPENSION WILL COMMENCE WITH THE OPENING OF BUSINESS ON OCTOBER 18, 2004 AND WILL CONCLUDE AT THE CLOSE OF BUSINESS ON OCTOBER 22, 2004.



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 16

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	FIRST ALLIED SECURITIES, INC.
Allegations:	Claimant generally alleges unsuitability, due diligence, fraud and failure to supervise.
Product Type:	Direct Investment-DPP & LP Interests
Alleged Damages:	\$100,000.01
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:	07/01/2020
Complaint Pending?	No
Status:	Settled
Status Date:	06/24/2022
Settlement Amount:	\$12,500.00
Individual Contribution Amount:	\$0.00

Disclosure 2 of 16

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	Northwestern Mutual Investment Services, LLC.
Allegations:	A client claims that he suffered financial loss as a result of purchasing a variable life insurance policy in the 1990's, the terms and characteristics of which the (now former) representative allegedly misrepresented. The client also alleges that the policy has under-performed when compared to the illustration provided to him by the representative at the time of sale.
Product Type:	Insurance
Alleged Damages:	\$3,034,852.00
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: 03/18/2020

Complaint Pending? No

Status: Denied

Status Date: 05/05/2020

Settlement Amount: \$0.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: Northwestern Mutual Investment Services, LLC.

Allegations: A client claims that he suffered financial loss as a result of purchasing a variable life insurance policy in the 1990's, the terms and characteristics of which the (now former) representative allegedly misrepresented. The client also alleges that the policy has under-performed when compared to the illustration provided to him by the representative at the time of sale.

Product Type: Insurance

Alleged Damages: \$3,034,852.00

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: 03/18/2020

Complaint Pending? No

Status: Denied

Status Date: 05/05/2020

Settlement Amount: \$0.00

Individual Contribution Amount: \$0.00

Disclosure 3 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: COMPLAINANTS ALLEGE MISREPRESENTATION OF VARIABLE LIFE INSURANCE POLICIES THEY PURCHASED. NO DAMAGES SPECIFIED.



Product Type: Insurance

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 09/25/2005

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 04/07/2002

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: INDEPENDENT ARBITRATION, NO CASE NUMBER

Date Notice/Process Served: 04/07/2002

Arbitration Pending? No

Disposition: Settled

Disposition Date: 09/25/2005

Monetary Compensation Amount: \$50,000.00

Individual Contribution Amount: \$0.00

Civil Litigation Information

Disposition: Settled

Disposition Date: 09/25/2005

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: COMPLAINTS ALLEGE MISREPRESENTATION OF VARIABLE LIFE INSURANCE POLICIES THEY PURCHASED. NO DAMAGES SPECIFIED.

Product Type: Insurance

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 09/25/2005

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 04/04/2002

Settlement Amount:



Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: INDEPENDENT ARBITRATION, NO CASE NUMBER

Date Notice/Process Served: 04/07/2002

Arbitration Pending? No

Disposition: Settled

Disposition Date: 09/25/2005

Monetary Compensation Amount: \$50,000.00

Individual Contribution Amount: \$0.00

Civil Litigation Information

Disposition: Settled

Disposition Date: 09/25/2005

Disclosure 4 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: THE CUSTOMERS ALLEGE THE REPRESENTATIVE MISREPRESENTED THE VARIABLE LIFE INSURANCE POLICIES THEY PURCHASED AS "OVER FUNDED PRIVATE PENSIONS."

Product Type: Insurance

Alleged Damages: \$131,492.45

Customer Complaint Information

Date Complaint Received: 03/22/2005

Complaint Pending? No

Status: Denied

Status Date: 04/14/2005

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: THE CUSTOMERS ALLEGE THE REPRESENTATIVE MISREPRESENTED THE VARIABLE LIFE INSURANCE POLICIES THEY PURCHASED AS "OVER



FUNDED PRIVATE PENSIONS."

Product Type: Insurance

Alleged Damages: \$131,492.45

Customer Complaint Information

Date Complaint Received: 03/22/2005

Complaint Pending? No

Status: Denied

Status Date: 04/14/2005

Settlement Amount:

Individual Contribution Amount:

Disclosure 5 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES. LLC

Allegations: COMPLAINANT ALLEGES THAT THE REPRESENTATIVE USED MISLEADING SALES MATERIALS AND MISREPRESENTED A VARIABLE LIFE INSURANCE POLICY, PURCHASED IN 1997, AS A PRIVATE PENSION PLAN.

Product Type: Insurance

Alleged Damages: \$20,588.00

Customer Complaint Information

Date Complaint Received: 05/17/2004

Complaint Pending? No

Status: Settled

Status Date: 07/22/2004

Settlement Amount: \$20,588.24

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC.

Allegations: COMPLAINT ALLEGES THAT THE REPRESENTATIVE USED MISLEADING SALES MATERIALS AND MISREPRESENTED A VARIABLE LIFE INSURANCE POLICY, PURCHASED IN 1997, AS A PRIVATE PENSION PLAN.

Product Type: Insurance

Alleged Damages: \$20,588.00

Customer Complaint Information



Date Complaint Received: 05/20/2004
Complaint Pending? No
Status: Settled
Status Date: 07/22/2004
Settlement Amount: \$20,588.24
Individual Contribution Amount: \$0.00

Disclosure 6 of 16

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: IN 2002 THIS CUSTOMER WAS ADDED AS AN ADDITIONAL CLAIMANT IN AN ARBITRATION PROCESS. NO WRITTEN COMPLAINT WAS EVER RECEIVED. NO SPECIFIC DAMAGES WERE ALLEGED.

Product Type: Insurance

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 04/01/2002
Complaint Pending? No
Status: Arbitration/Reparation
Status Date: 04/01/2002
Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: PRIVATE ARBITRATION. NO COURTS OR REGULATORY AGENCIES INVOLVED

Date Notice/Process Served: 04/01/2002

Arbitration Pending? No

Disposition: Settled

Disposition Date: 11/20/2003

Monetary Compensation Amount: \$14,000.00

Individual Contribution Amount: \$0.00

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Reporting Source: Individual



Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES LLC

Allegations: IN 2002 THIS CUSTOMER WAS ADDED AS AN ADDITIONAL CLAIMANT IN AN ARBITRATION PROCESS. NO WRITTEN COMPLAINT WAS EVER RECEIVED.

Product Type: Insurance

Alleged Damages:

Customer Complaint Information

Date Complaint Received: 04/01/2002

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 04/01/2002

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: PRIVATE ARBITRATION. NO COURTS OR REGULATORY AGENIES INVOLVED. NO SPECIFIC DAMAGES WERE ALLEGED.

Date Notice/Process Served: 04/01/2002

Arbitration Pending? No

Disposition: Settled

Disposition Date: 11/20/2003

Monetary Compensation Amount: \$14,000.00

Individual Contribution Amount: \$0.00

Broker Statement NO SPECIFIC DAMAGES WERE ALLEGED.

Disclosure 7 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: COMPLAINANTS ALLEGE THAT THE REPRESENTATIVE USED MISLEADING SALES MATERIALS AND MISREPRESENTED VARIABLE LIFE INSURANCE POLICIES, PURCHASED IN 1997, AS PRIVATE PENSION PLANS. NO DAMAGES WERE SPECIFIED.

Product Type: Insurance

Alleged Damages: \$0.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC Yes



reparation or civil litigation?

Arbitration/Reparation forum or court name and location: MARION COUNTY SUPERIOR COURT, INDIANA

Docket/Case #: 49D110207CT001258

Filing date of arbitration/CFTC reparation or civil litigation: 11/17/2003

Customer Complaint Information

Date Complaint Received: 11/17/2003

Complaint Pending? No

Status: Evolved into Civil litigation (the individual is a named party)

Status Date: 08/27/2009

Settlement Amount: \$150,000.00

Individual Contribution Amount: \$0.00

Civil Litigation Information

Type of Court: State Court

Name of Court: MARION COUNTY SUPERIOR COURT

Location of Court: MARIAN COUNTY, INDIANA

Docket/Case #: 49D110207CT001258

Date Notice/Process Served: 11/17/2003

Litigation Pending? No

Disposition: Settled

Disposition Date: 08/27/2009

Monetary Compensation Amount: \$150,000.00

Individual Contribution Amount: \$0.00

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL LIFE CORP.

Allegations: CUSTOMER CLAIMS HE WAS NOT AWARE HE WAS BUYING A LIFE INSURANCE POLICY IN APRIL 1997.

Product Type: Insurance

Alleged Damages: \$0.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes



Arbitration/Reparation forum or court name and location: MARION COUNTY SUPERIOR COURT

Docket/Case #: 49D110207CT001258

Filing date of arbitration/CFTC reparation or civil litigation: 11/10/2003

Customer Complaint Information

Date Complaint Received: 11/10/2003

Complaint Pending? No

Status: Evolved into Civil litigation (the individual is a named party)

Status Date: 08/27/2009

Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Type of Court: State Court

Name of Court: MARION COUNTY SUPERIOR COURT

Location of Court: MARIAN COUNTY, INDIANA

Docket/Case #: 49D110207CT001258

Date Notice/Process Served: 11/10/2003

Litigation Pending? No

Disposition: Settled

Disposition Date: 08/27/2009

Monetary Compensation Amount: \$150,000.00

Individual Contribution Amount: \$0.00

Broker Statement REP DENIES ALL ALLEGATIONS. E&O CARRIER RESOLVED OVER THE REP'S OBJECTION. THE SETTLEMENT WITH THE CLIENT IS A COMPROMISE OF A DISPUTED CLAIM AND THAT THE PAYMENT SHOULD NOT BE CONSTRUED AS ADMISSION OF ANY WRONGDOING, ADMISSION OF ANY GUILT, AND OR LIABILITY ON THE PART OF ANY PARTY, PERSON, OR ENTITY.

Disclosure 8 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CLIENT ALLEGES THAT REPRESENTATIVE MISREPRESENTED A VARIABLE LIFE INSURANCE POLICY SOLD IN 1998 AS A PRIVATE PENSION PLAN. HE ALSO ALLEGES THAT HIS SIGNATURE AND INITIALS ON CERTAIN APPLICATION FORMS FOR THIS INSURANCE ARE NOT HIS.



Product Type: Insurance
Alleged Damages: \$17,336.48

Customer Complaint Information

Date Complaint Received: 09/25/2003
Complaint Pending? No
Status: Settled
Status Date: 12/17/2003
Settlement Amount: \$18,112.31
Individual Contribution Amount: \$0.00

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CLIENT ALLEGES THAT REPRESENTATIVE MISREPRESENTED A VARIABLE LIFE INSURANCE POLICY SOLD IN 1998 AS A PRIVATE PENSION PLAN. HE ALSO ALLEGES THAT HIS SIGNATURE AND INITIALS ON CERTAIN APPLICATION FORMS FOR THIS INSURANCE ARE NOT HIS.

Product Type: Insurance
Alleged Damages: \$17,336.48

Customer Complaint Information

Date Complaint Received: 10/06/2003
Complaint Pending? No
Status: Settled
Status Date: 12/17/2003
Settlement Amount: \$18,112.31
Individual Contribution Amount: \$0.00

Disclosure 9 of 16

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CLIENT ALLEGES THE REPRESENTATIVE USED UNAPPROVED, MISLEADING SALES MATERIAL, AND MISREPRESENTED POLICY FEATURES INCLUDING LOAN PROVISIONS, AND "TAX-FREE" ANNUAL PAYMENTS AS A SOURCE OF RETIREMENT INCOME. THE CLIENT PURCHASED THE VARIABLE LIFE INSURANCE POLICY IN 1997. THE CLIENT DOES NOT SPECIFY DAMAGE AMOUNT.

Product Type: Insurance
Alleged Damages:



Customer Complaint Information

Date Complaint Received: 02/10/2003

Complaint Pending? No

Status: Denied

Status Date: 03/19/2003

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CLIENT ALLEGES THE REPRESENTATIVE USED UNAPPROVED, MISLEADING SALES MATERIAL AND MISREPRESENTED POLICY FEATURES INCLUDING LOAN PROVISIONS, AND "TAX-FREE" ANNUAL PAYMENTS AS A SOURCE OF RETIREMENT INCOME. THE CLIENT PURCHASED THE VARIABLE LIFE INSURANCE POLICY IN 1997. THE CLIENT DOES NOT SPECIFY DAMAGE AMOUNT.

Product Type: Insurance

Alleged Damages: \$0.00

Customer Complaint Information

Date Complaint Received: 02/10/2003

Complaint Pending? No

Status: Denied

Status Date: 03/19/2003

Settlement Amount:

Individual Contribution Amount:

Broker Statement REP DENIES ALLEGATIONS

Disclosure 10 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CUSTOMER ALLEGES HE PURCHASED A VARIABLE LIFE INSURANCE POLICY IN 1998 BASED ON MISREPRESENTATIONS. THE CUSTOMER FURTHER ALLEGES THE VARIABLE LIFE INSURANCE POLICY WAS NOT SUITABLE TO HIS STATED NEEDS.

Product Type: Insurance

Alleged Damages: \$75,000.00



Customer Complaint Information

Date Complaint Received: 03/18/2003
Complaint Pending? No
Status: Litigation
Status Date: 05/28/2004

Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Court Details: MARION COUNTY SUPERIOR COURT, STATE OF INDIANA, CASE # 490030405PL000996

Date Notice/Process Served: 05/25/2004

Litigation Pending? No

Disposition: Settled

Disposition Date: 08/24/2005

Monetary Compensation Amount: \$5,656.24

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CUSTOMER ALLEGES HE PURCHASED A VARIABLE LIFE INSURANCE POLICY IN 1998 BASED ON MISREPRESENTATIONS. THE CUSTOMER FURTHER ALLEGES THE VARIABLE LIFE INSURANCE POLICY WAS NOT SUITABLE TO HIS STATED NEEDS. THE CLIENT DID NOT SPECIFY DAMAGES.

Product Type: Insurance

Alleged Damages: \$75,000.00

Customer Complaint Information

Date Complaint Received: 03/18/2003
Complaint Pending? No
Status: Litigation
Status Date: 05/28/2004

Settlement Amount:

Individual Contribution Amount:

Civil Litigation Information

Court Details: MARION COUNTY SUPERIOR COURT, STATE OF INDIANA, CASE # 490030405PL000996



Date Notice/Process Served: 05/25/2004
Litigation Pending? No
Disposition: Settled
Disposition Date: 08/24/2004
Monetary Compensation Amount: \$5,656.24
Individual Contribution Amount: \$0.00
Broker Statement REP DENIES ALLEGATIONS

Disclosure 11 of 16

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
Allegations: CLIENTS ALLEGE THAT REPRESENTATIVE MISREPRESENTED VARIABLE LIFE INSURANCE POLICIES SOLD IN 1999 AND 2000 AS VARIABLE PENSION PLANS AND PRIVATE PENSION PLANS.
Product Type: Insurance
Alleged Damages: \$42,948.55

Customer Complaint Information

Date Complaint Received: 01/20/2003
Complaint Pending? No
Status: Settled
Status Date: 10/06/2003
Settlement Amount: \$41,837.44
Individual Contribution Amount: \$0.00
Firm Statement NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY CONCLUDED ITS INVESTIGATION, FINDING NO EVIDENCE TO SUPPORT THE CLIENT'S ALLEGATIONS.

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
Allegations: CLIENTS ALLEGE THAT REPRESENTATIVE MISREPRESENTED VARIABLE LIFE INSURANCE POLICIES SOLD IN 1999 AND 2000 AS VARIABLE PENSION PLANS AND PRIVATE PENSION PLANS.
Product Type: Insurance
Alleged Damages: \$42,948.55

Customer Complaint Information



Date Complaint Received: 01/20/2003

Complaint Pending? No

Status: Settled

Status Date: 10/06/2003

Settlement Amount: \$41,837.44

Individual Contribution Amount: \$0.00

Broker Statement REP CLAIMS SALE DISCUSSIONS WERE BASED ON LIFE INSURANCE AND EDUCATIONAL PLANNING FOR CHILDREN. REP DENIES ALLEGATIONS. NORTHWESTERN MUTUAL LIFE INSURANCE CO CONCLUDED ITS INVESTIGATION, FINDING NO EVIDENCE TO SUPPORT THE CLIENT'S ALLEGATIONS.

Disclosure 12 of 16

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL, LLC

Allegations: CUSTOMERS ALLEGE THAT VARIABLE LIFE POLICIES SOLD TO THEM IN 1996 WERE SOLD BY REPRESENTATIVE AS PRIVATE PENSION PLANS, THAT REPRESENTATIVE GUARANTEED A CERTAIN RATE OF TAX-FREE RETURN AND STATED THAT POLICIES WOULD PROVIDE A RATE OF RETURN IN EXCESS OF THE GUARANTEED RATE OF RETURN; THAT REPRESENTATIVE SAID THAT PREMIUM PAYMENTS WOULD ONLY HAVE TO BE MADE UNTIL AGE 55 AND THAT THE POLICY WOULD PROVIDE A CERTAIN ANNUAL PAYMENT, TAX-FREE, FOR A SOURCE OF RETIREMENT INCOME. NO DAMAGES AMOUNT IS SPECIFIED.

Product Type: Insurance

Alleged Damages: \$0.00

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: MARION SUPERIOR COURT

Docket/Case #: 49E110205CT0000798

Filing date of arbitration/CFTC reparation or civil litigation: 05/10/2002

Customer Complaint Information

Date Complaint Received: 05/10/2002

Complaint Pending? No

Status: Settled

Status Date: 09/03/2009



Settlement Amount: \$260,000.00

Individual Contribution Amount: \$0.00

Civil Litigation Information

Type of Court: State Court

Name of Court: MARION COUNTY SUPERIOR COURT

Location of Court: MARION COUNTY, INDIANA

Docket/Case #: 49D110205CT000798

Date Notice/Process Served: 05/10/2002

Litigation Pending? No

Disposition: Settled

Disposition Date: 09/03/2009

Monetary Compensation Amount: \$260,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CUSTOMERS ALLEGE THAT VARIABLE LIFE POLICIES SOLD TO THEM IN 1996 WERE SOLD BY REPRESENTATIVE AS PRIVATE PENSION PLANS, THAT REPRESENTATIVE GUARANTEED A CERTAIN RATE OF TAX-FREE RETURN AND STATED THAT POLICIES WOULD PROVIDE A RATE OF RETURN IN EXCESS OF THE GUARANTEED RATE OF RETURN; REPRESENTATIVE ALLEGEDLY ADVISED THAT PREMIUM PAYMENTS WOULD ONLY HAVE TO BE MADE UNTIL AGE 55 AND THAT THE POLICY WOULD PROVIDE A CERTAIN ANNUAL PAYMENT, TAX-FREE, FOR A SOURCE OF RETIREMENT INCOME. NO DAMAGES AMOUNT IS SPECIFIED.

Product Type: Insurance

Alleged Damages: \$0.00

Is this an oral complaint? No

Is this a written complaint? No

Is this an arbitration/CFTC reparation or civil litigation? Yes

Arbitration/Reparation forum or court name and location: MARION SUPERIOR COURT

Docket/Case #: 49E110205CT0000798

Filing date of arbitration/CFTC reparation or civil litigation: 05/10/2002

Customer Complaint Information

Date Complaint Received: 05/10/2002



Complaint Pending? No
Status: Evolved into Civil litigation (the individual is a named party)
Status Date: 08/25/2009

Settlement Amount:
Individual Contribution Amount:

Civil Litigation Information

Type of Court: State Court
Name of Court: MARION COUNTY SUPERIOR COURT
Location of Court: MARION COUNTY, INDIANA
Docket/Case #: 49D110205CT000798
Date Notice/Process Served: 05/10/2002

Litigation Pending? No
Disposition: Settled
Disposition Date: 09/03/2009
Monetary Compensation Amount: \$260,000.00
Individual Contribution Amount: \$0.00

Broker Statement
E&O CARRIER RESOLVED OVER REP'S OBJECTION. THE SETTLEMENT WITH THE CLIENT IS A COMPROMISE OF A DISPUTED CLAIM AND THAT THE PAYMENT SHOULD NOT BE CONSTRUED AS ADMISSION OF ANY WRONGDOING, ADMISSION OF ANY GUILT, AND OR LIABILITY ON THE PART OF ANY PARTY, PERSON OR ENTITY.

Disclosure 13 of 16

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
Allegations: CUSTOMER ALLEGES REPRESENTATIVE USED UNAPPROVED, MISLEADING SALES MATERIAL AND MISREPRESENTED VARIABLE LIFE INSURANCE.
Product Type: Insurance
Alleged Damages: \$25,000.00

Customer Complaint Information

Date Complaint Received: 07/07/2000
Complaint Pending? No
Status: Settled
Status Date: 07/28/2000
Settlement Amount: \$30,000.00



Individual Contribution Amount: \$30,000.00

Firm Statement COMPLAINT SETTLED BY PURCHASE OF VARIABLE LIFE POLICY FOR APPROXIMATELY \$30,000.

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Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CUSTOMER ALLEGES REPRESENTATIVE USED UNAPPROVED, MISLEADING SALES MATERIAL AND MISREPRESENTED VARIABLE LIFE INSURANCE.

Product Type: Insurance

Alleged Damages: \$25,000.00

Customer Complaint Information

Date Complaint Received: 07/07/2000

Complaint Pending? No

Status: Settled

Status Date: 07/28/2000

Settlement Amount: \$30,000.00

Individual Contribution Amount: \$30,000.00

Broker Statement COMPLAINT SETTLED BY PURCHASE OF VARIABLE LIFE POLICY FOR APPROXIMATELY \$30,000.

Disclosure 14 of 16

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC

Allegations: CUSTOMER ALLEGES VARIABLE LIFE INSURANCE WAS MISREPRESENTED AS A PRIVATE PENSION PLAN BY REPRESENTATIVE.

Product Type: Insurance

Alleged Damages: \$80,000.00

Customer Complaint Information

Date Complaint Received: 08/02/2000

Complaint Pending? No

Status: Denied

Status Date: 09/01/2000

Settlement Amount:

Individual Contribution Amount:



Broker Statement DENIED ALLEGATIONS BASED ON MATERIALS PROVIDED TO CUSTOMER AT TIME OF SALE.

Disclosure 15 of 16

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
Allegations: CUSTOMER ALLEGES REPRESENTATIVE MISREPRESENTED VARIABLE LIFE INSURANCE POLICY.
Product Type: Insurance
Alleged Damages: \$9,000.00

Customer Complaint Information

Date Complaint Received: 08/29/2000
Complaint Pending? No
Status: Denied
Status Date: 11/21/2000

Settlement Amount:

Individual Contribution Amount:

Broker Statement CUSTOMER OFFERED AND HAS ACCEPTED CHANGE OF POLICY TO TERM PLAN AS RESOLUTION. THIS CHANGE IS A PLAN PROVISION.

Disclosure 16 of 16

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
Allegations: ALLEGES THAT REPRESENTATIVE MISREPRESENTED VARIABLE LIFE INSURANCE AS A PRIVATE PENSION PLAN OR DIVERSIFIED INVESTMENT RETIREMENT PLAN.
Product Type: Insurance
Alleged Damages: \$5,171.35

Customer Complaint Information

Date Complaint Received: 09/19/2000
Complaint Pending? No
Status: Denied
Status Date: 11/03/2000

Settlement Amount:

Individual Contribution Amount:

Broker Statement SALE DEFENDED BASED ON INFORMATION IN CLIENT FILES AND



MATERIALS PROVIDED TO CUSTOMER DURING THE SALE.



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:	Individual
Firm Name:	NORTHWESTERN MUTUAL INVESTMENT SERVICES, LLC
Termination Type:	Permitted to Resign
Termination Date:	07/12/2002
Allegations:	FAILURE TO ABIDE BY TERMS OF SPECIAL SUPERVISORY PROCEDURES AND FAILURE TO FULLY AND COMPLETELY DISCLOSE ALL OUTSIDE BUSINESS ACTIVITY.
Product Type:	Insurance
Other Product Types:	MUTUAL FUNDS
Broker Statement	REG REP VOLUNTARILY RESIGNED BY MUTUAL AGREEMENT. REG REP NEITHER ADMITS OR DENIES ALLEGATIONS OF VIOLATING SUPERVISORY SALES PROCEDURES OF FIRM.



End of Report

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