

BrokerCheck Report

LOCUST STREET SECURITIES, INC.

CRD# 1703

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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.

About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck 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 broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

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

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

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Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. [For more information about FINRA, visit www.finra.org.](http://www.finra.org)



LOCUST STREET SECURITIES, INC.

CRD# 1703

SEC# 8-14037

Main Office Location

909 LOCUST STREET
DES MOINES, IA 50309-9270

Mailing Address

909 LOCUST STREET
DES MOINES, IA 50309-9270

Business Telephone Number

515-698-7300

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a corporation.
This firm was formed in Iowa on 07/16/1968.
Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This brokerage firm is no longer registered with FINRA or a national securities exchange.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	2
Arbitration	2

Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



Date firm ceased business: 01/01/2004

Does this brokerage firm owe any money or securities to any customer or brokerage firm? No



Firm Profile

This firm is classified as a corporation.
This firm was formed in Iowa on 07/16/1968.
Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

LOCUST STREET SECURITIES, INC.
Doing business as LOCUST STREET SECURITIES, INC.
CRD# 1703
SEC# 8-14037

Main Office Location
909 LOCUST STREET
DES MOINES, IA 50309-9270

Mailing Address
909 LOCUST STREET
DES MOINES, IA 50309-9270

Business Telephone Number
515-698-7300

Other Names of this Firm

Name	Where is it used
VARIABLE LIFE BROKERAGE DISTRIBUTORS	AK, AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	ING ADVISORS NETWORK. INC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	SOLE SHAREHOLDER
Position Start Date	12/1999
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	COKINIS, CHRISTOPHER ALEX 1527389
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT, CHIEF COMPLIANCE OFFICER AND SECRETARY
Position Start Date	01/2003
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FRIEBERG, DAVID EUGENE 1289486
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT, RECRUITING
Position Start Date	04/2001

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): LARAIA, KEVIN MICHAEL
2456743

Is this a domestic or foreign entity or an individual? Individual

Position TREASURER, VICE PRESIDENT FINANCE & OPERATIONS, FIN OP, COO

Position Start Date 12/1999

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): LINDBERG, KARL STEPHEN
1001270

Is this a domestic or foreign entity or an individual? Individual

Position PRESIDENT/DIRECTOR

Position Start Date 07/1999

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): SIMMERS, JOHN STEPHEN

Firm Profile



Direct Owners and Executive Officers (continued)

	711578
Is this a domestic or foreign entity or an individual?	Individual
Position	CHAIRMAN OF BOARD
Position Start Date	10/2001
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No
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Legal Name & CRD# (if any):	STEPHENS, LYNN ANNETTE 2169858
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT, BUSINESS DEVELOPMENT
Position Start Date	04/2001
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No
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Legal Name & CRD# (if any):	STYCH, KEVIN PAUL 1904094
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT, SALES & MARKETING
Position Start Date	06/1999
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No



Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any): ING AMERICA INSURANCE HOLDING, INC (ING US)

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established ING ADVISORS NETWORK, INC

Relationship to Direct Owner SOLE SHAREHOLDER

Relationship Established 12/1999

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): ING GROEP, NV

Is this a domestic or foreign entity or an individual? Foreign Entity

Company through which indirect ownership is established ING VERZKERINGEN, NV

Relationship to Direct Owner SOLE SHAREHOLDER

Relationship Established 03/1991

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? Yes

Legal Name & CRD# (if any): ING INSURANCE INTERNATIONAL, BV (ING INTERNATIONAL)

Is this a domestic or foreign entity or an individual? Foreign Entity

Firm Profile



Indirect Owners (continued)

Company through which indirect ownership is established	ING US
Relationship to Direct Owner	SOLE SHAREHOLDER
Relationship Established	04/1997
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
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Legal Name & CRD# (if any):	ING VERZKERERINGEN, NV
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	ING INTERNATIONAL
Relationship to Direct Owner	SOLE SHAREHOLDER
Relationship Established	12/1963
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
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Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.



Firm Operations



Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is no longer registered.

The firm's registration was from 09/13/1968 to 02/05/2004.



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 10 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Broker or dealer selling oil and gas interests
Investment advisory services
Broker or dealer selling tax shelters or limited partnerships in primary distributions
Non-exchange member arranging for transactions in listed securities by exchange member
Broker or dealer involved in a networking, kiosk or similar arrangement with a: bank, savings bank or association, or credit union

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name:	PERSHING, LLC
Business Address:	ONE PERSHING PLAZA JERSEY CITY, NJ 07399
Effective Date:	01/17/2003
Description:	APPLICANT HAS ENTERED INTO A CORRESPONDENT CLEARING ARRANGEMENT WITH PERSHING. ON A FULLY DISCLOSED BASIS, APPLICANT INTRODUCES CUSTOMERS TO PERSHING, THROUGH WHICH ALL SUCH CUSTOMER EXCHANGE LISTED AND OVER-THE-COUNTER SECURITIES TRANSACTIONS ARE PROCESSED.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name: PERSHING, LLC

Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399

Effective Date: 01/17/2003

Description: APPLICANT HAS ENTERED INTO A CORRESPONDENT CLEARING ARRANGEMENT WITH PERSHING, THROUGH WHICH ALL EXCHANGE LISTED AND OVER-THE-COUNTER SECURITIES TRANSACTIONS ARE PROCESSED. CUSTOMER ACCOUNT RECORDS ARE MAINTAINED BY PERSHING.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does have customer accounts, funds, or securities maintained by a third party.

Name: PERSHING, LLC

Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399

Effective Date: 01/17/2003

Description: APPLICANT ENTERED INTO A CORRESPONDENT CLEARING ARRANGEMENT WITH PERSHING, THROUGH WHICH ALL SUCH CUSTOMER EXCHANGE LISTED AND OVER-THE-COUNTER SECURITIES TRANSACTIONS ARE PROCESSED. CUSTOMER ACCOUNTS ARE MAINTAINED AND FUNDS AND SECURITIES ARE HELD BY PERSHING.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

ING DIRECT SECURITIES INC. is under common control with the firm.

CRD #:	112624
Business Address:	1 SOUTH ORANGE STREET WILMINGTON, DE 19801
Effective Date:	09/18/2001
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ON 9/18/01, ING A FORMED A BD AFFILIATE OF ING DIRECT SERVICES, INC. PREVIOUSLY ON 10/23/97 ING PURCHASED LOCUST STREET SECURITIES, INC.

ING DIRECT FUNDS LIMITED is under common control with the firm.

Business Address:	111 GORDON BAKER RD, STE 900 TORONTO, ONTARIO M2H 3R1
Effective Date:	11/26/1999
Foreign Entity:	Yes
Country:	CANADA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ING PURCHASED ING DIRECT FUNDS LIMITED ON 11/26/1999. PREVIOUSLY, ING PURCHASED LOCUST STREET SECURITIES, INC. ON OCTOBER 23, 1997.

Firm Operations



Organization Affiliates (continued)

ING INVESTMENT MANAGEMENT ADVISORS B.V. is under common control with the firm.

Business Address:	PRINCESS BEATRIXLAAN 15 THE HAGUE, THE NETHERLANDS FOREIGN
Effective Date:	10/23/1997
Foreign Entity:	Yes
Country:	NETHERLANDS
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ON FEBRUARY 7, 1992, ING PURCHASED ING INVESTMENT MANAGEMENT ADVISORS B.V. ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

AELTUS INVESTMENT MANAGEMENT, INC. is under common control with the firm.

Business Address:	10 STATE HOUSE SQUARE HARTFORD, CT 06103
Effective Date:	12/13/2000
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ON DECEMBER 13, 2000, ING PURCHASED AELTUS INVESTMENT MANAGEMENT, INC. PREVIOUSLY ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

FINANCIAL NETWORK INVESTMENT CORPORATION is under common control with the firm.

CRD #:	13572
Business Address:	2780 SKYPARK DRIVE #3 TORRANCE, CA 90505
Effective Date:	12/13/2000
Foreign Entity:	No
Country:	

Firm Operations



Organization Affiliates (continued)

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ON DECEMBER 13, 2000, ING PURCHASED FINANCIAL NETWORK INVESTMENT CORPORATION. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

AELTUS CAPITAL, INC is under common control with the firm.

CRD #: 24928

Business Address: 10 STATE HOUSE SQUARE
HARTFORD, CT 06103-3602

Effective Date: 12/13/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ON DECEMBER 13, 2000, ING PURCHASED AELTUS CAPITAL, INC. PREVIOUSLY ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

ING LIFE INSURANCE AND ANNUITY COMPANY is under common control with the firm.

CRD #: 13256

Business Address: 151 FARMINGTON AVENUE
HARTFORD, CT 06156-1492

Effective Date: 03/06/2003

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ON DECEMBER 13, 2000, ING PURCHASED AETNA LIFE INSURANCE AND ANNUITY COMPANY. PREVIOUSLY ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

Firm Operations



Organization Affiliates (continued)

2/6/02 AETNA LIFE INSURANCE AND ANNUITY COMPANY CHANGED NAME TO ING LIFE INSURANCE AND ANNUITY COMPANY D/B/A AETNA LIFE INSURANCE AND ANNUITY COMPANY.

SYSTEMATIZED BENEFITS ADMINISTRATORS, INC. is under common control with the firm.

CRD #: 19242

Business Address: 151 FARMINGTON AVENUE
HARTFORD, CT 06156-1492

Effective Date: 12/13/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ON DECEMBER 13, 2000 ING PURCHASED SYSTEMIZED BENEFITS ADMINISTRATORS, INC. PREVIOUSLY ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

AETNA INVESTMENT SERVICES, LLC is under common control with the firm.

CRD #: 34815

Business Address: 151 FARMINGTON AVENUE
HARTFORD, CT 06156-1492

Effective Date: 05/01/2002

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ON DECEMBER 13, 2000, ING PURCHASED AETNA INVESTMENT SERVICES, LLC. PREVIOUSLY ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.
5/1/02 AETNA INVESTMENT SERVICES WAS RENAMED TO ING FINANCIAL ADVISORS, LLC

ING CAPITAL ADVISORS LLC is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 230 PARK AVENUE
NEW YORK, NY 10169

Effective Date: 10/01/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ON OCTOBER 1, 1997, ING PURCHASED CAPITAL ADVISORS LLC. ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

ING GHENT MANAGEMENT, LLC is under common control with the firm.

Business Address: 230 PARK AVENUE
NEW YORK, NY

Effective Date: 05/01/2000

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ON MAY 1, 2000, ING PURCHASED ING GHENT MANAGEMENT, LLC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

RELIASTAR INVESTMENT RESEARCH, INC. is under common control with the firm.

Business Address: 100 WASHINGTON AVE SOUTH, STE 800
MINNEAPOLIS, MN 55401-2121

Effective Date: 09/01/2000

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: ON SEPTEMBER 1, 2000, ING PURCHASED RELIASTAR INVESTMENT RESEARCH, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

ING FUNDS DISTRIBUTOR, LLC is under common control with the firm.

CRD #: 37886

Business Address: 7337 EAST DOUBLETREE RANCH RD
SCOTTSDALE, AZ 85258-2034

Effective Date: 10/01/2002

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ON SEPTEMBER 1, 2000, ING PURCHASED PILGRIM SECURITIES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

3/1/02 ING PILGRIM SECURITIES, INC. NAME WAS CHANGED TO ING FUNDS DISTRIBUTORS, INC.

10/1/02 ING FUND DISTRIBUTORS, INC. HAS BEEN CHANGED TO ING FUND DISTRIBUTOR, LLC.

ING ADVISORS, INC. is under common control with the firm.

Business Address: 7337 EAST DOUBLETREE RANCH RD
SCOTTSDALE, AZ 85258-2034

Effective Date: 03/01/2002

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ON SEPTEMBER 1, 2000, ING PURCHASED LEXINGTON MANAGEMENT CORPORATION. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC. EFFECTIVE 4/9/01, ING LEXINGTON

Firm Operations



Organization Affiliates (continued)

MANAGEMENT CORP HAS CHANGED THEIR NAME TO ING PILGRIM ADVISORS, INC.

ING INVESTMENTS, LLC is under common control with the firm.

Business Address: 7337 EAST DOUBLETREE RANCH RD
SCOTTSDALE, AZ 85258-2034

Effective Date: 03/01/2002

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: ON SEPTEMBER 1, 2000, ING PURCHASED PILMGRIM INVESTMENTS, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

GRANITE INVESTMENT SERVICES, INC. is under common control with the firm.

CRD #: 31299

Business Address: 400 FIRST STREET SOUTH, STE 300
ST CLOUD, MN 56301

Effective Date: 09/01/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ON SEPTEMBER 1, 2000, ING PURCHASED GRANITE INVESTMENT SERVICES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

GUARANTY BROKERAGE SERVICES, INC. is under common control with the firm.

CRD #: 23302

Business Address: 400 FIRST STREET SOUTH, STE 300
ST CLOUD, MN 56301

Firm Operations



Organization Affiliates (continued)

Effective Date: 09/01/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ON SEPTEMBER 1, 2000, ING PURCHASED BISYS BROKERAGE SERVICES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

FINANCIAL NORTHEASTERN SECURITIES, INC. is under common control with the firm.

CRD #: 17007

Business Address: 100 PASSAIC AVENUE
FAIRFIELD, NJ 07004

Effective Date: 09/01/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ON SEPT 1, 2000, ING PURCHASED FINANCIAL NORTHEASTERN SECURITIES, INC. PREVIOUSLY, ING PURCHASED LOCUST STREET SECURITIES, INC ON OCTOBER 23, 1997.

PRIMEVEST FINANCIAL SERVICES, INC. is under common control with the firm.

CRD #: 15340

Business Address: 400 FIRST STREET SOUTH, STE 300
ST CLOUD, MN 56301

Effective Date: 09/01/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: ON SEPT 1, 2000, ING PURCHASED PRIMEVEST FINANCIAL SERVICES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

WASHINGTON SQUARE SECURITIES, INC. is under common control with the firm.

CRD #: 2882

Business Address: 111 WASHINGTON AVE SOUTH
MINNEAPOLIS, MN 55401-1900

Effective Date: 09/01/2000

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: ON SEPT 1, 2000, ING PURCHASED WASHINGTON SQUARE SECURITIES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING PURCHASED LOCUST STREET SECURITIES, INC.

BARING ASSET MANAGEMENT (ASIA), LTD is under common control with the firm.

Business Address: 15 QUEENS RD CENTRAL
19TH FLOOR, EDINGBURG TOWER, THE LANDMARK
HONG KONG, REPUBLIC OF CHINA FOREIGN

Effective Date: 03/08/1995

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: No

Investment Advisory Activities: Yes

Description: LOCUST STREET SECURITIES AND BARING ASSET MANAGEMENT (ASIA) ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS AND BOTH ENTITIES ARE OWNED BY ING

BARING INTERNATIONAL INVESTMENT LIMITED is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 155 BISHOP GATE
LONDON, ENGLAND EC2M3XY

Effective Date: 10/23/1997

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: No

Investment Advisory Activities: Yes

Description: LOCUST STREET SECURITIES AND BARING INTERNATIONAL INVESTMENT LIMITED ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ENTITIES ARE OWNED BY ING.

BARING ASSET MANAGEMENT, INC is under common control with the firm.

Business Address: HIGH STREET TOWER, 125 HIGH STREET, STE 2700
BOSTON, MA 02110

Effective Date: 01/08/1999

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: LOCUST STREET SECURITIES AND BARING ASSET MANAGEMENT ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ARE OWNED BY ING.

ING FINANCIAL MARKETS LLC is under common control with the firm.

CRD #: 28872

Business Address: 1325 AVENUE OF THE AMERICAS
NEW YORK, NY 10019

Effective Date: 10/23/1997

Foreign Entity: No

Country:

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: LOCUST STREET SECURITIES AND ING (US) SECURITIES, FUTURES, & OPTIONS, INC. ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ARE OWNED BY ING. EFFECTIVE 4/30/01, ING (US) SECURITIES, FUTURES & OPTIONS HAS CHANGED THEIR NAME TO ING BARINGS CORP. EFFECTIVE 4/11/02 ING BARINGS CORP RENAMED TO ING FINANCIAL MARKETS LLC.

BARING INVESTMENT SERVICES, INC. is under common control with the firm.

CRD #: 29645

Business Address: HIGH STREET TOWER, 125 HIGH STREET, STE 2700
BOSTON, MA 02110

Effective Date: 10/23/1997

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: LOCUST STREET SECURITIES AND BARING INVESTMENT SERVICES, INC. ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ENTITIES ARE OWNED BY ING.

FSIP, LLC is under common control with the firm.

Business Address: 230 PARK AVENUE
NEW YORK, NY 10169

Effective Date: 10/23/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: BOTH LOCUST STREET SECURITIES, INC. AND FSIP, LLC ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH

Firm Operations



Organization Affiliates (continued)

ENTITIES ARE OWNED BY ING.

FURMAN SELZ CAPITAL MANAGEMENT, LLC is under common control with the firm.

Business Address: 230 PARK AVENUE
NEW YORK, NY 10169

Effective Date: 10/23/1997

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: BOTH LOCUST STREET SECURITIES AND FURMAN SELZ CAPITAL MANAGEMENT, LLC ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ENTITIES ARE OWNED BY ING.

UNITED VARIABLE SERVICES, INC. is under common control with the firm.

CRD #: 38181

Business Address: 1475 DUNWOODY DRIVE
WEST CHESTER, PA 19380

Effective Date: 04/30/1999

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: LOCUST STREET SECURITIES AND UNITED VARIABLE SERVICES, INC. ARE ENGAGED IN SECURITIES AND/OR ADVISORY BUSINESS, AND BOTH ENTITIES ARE OWNED BY ING.

ING AMERICA EQUITIES, INC. is under common control with the firm.

CRD #: 36259

Business Address: 1290 BROADWAY
DENVER, CO 80203

Firm Operations



Organization Affiliates (continued)

Effective Date: 10/23/1999

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: ING AMERICA EQUITIES, INC. WAS ESTABLISHED AS THE WHOLESALE BROKER-DEALER FOR SECURITY LIFE OF DENVER IN AUGUST 1994. SECURITY LIFE OF DENVER WAS PURCHASED BY ING PRIOR TO THE DATE ING PURCHASED EQUITABLE OF IOWA COMPANIES ON OCTOBER 23, 1997.

ING FURMAN SELZ FINANCIAL SERVICES LLC is under common control with the firm.

CRD #: 21644

Business Address: 230 PARK AVENUE
NEW YORK, NY 10169

Effective Date: 10/23/1999

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: BOTH LOCUST STREET SECURITIES, INC. AND ING FURMAN SELZ FINANCIAL SERVICES, LLC ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ENTITIES ARE OWNED BY ING.

ING INVESTMENT MANAGEMENT, LLC is under common control with the firm.

Business Address: 5780 POWERS FERRY RD
ATLANTA, GA 30327

Effective Date: 12/16/1997

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	Yes
Description:	BOTH LOCUST STREET SECURITIES AND ING INVESTMENT MANAGEMENT, LLC ARE ENGAGED IN THE SECURITIES AND/OR INVESTMENT ADVISORY BUSINESS, AND BOTH ENTITIES ARE OWNED BY ING.

DIRECTED SERVICES, INC. is under common control with the firm.

CRD #:	21675
Business Address:	1475 DUNWOODY DRIVE WESTCHESTER, PA 19380
Effective Date:	08/13/1996
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	ON AUGUST 13, 1996, EQUITABLE OF IOWA COMPANIES ACQUIRED GOLDEN AMERICAN LIFE INSURANCE COMPANY. DIRECTED SERVICES IS OWNED BY GOLDEN AMERICA LIFE INSURANCE COMPANY.

COMPULIFE INVESTOR SERVICES, INC. is under common control with the firm.

CRD #:	21543
Business Address:	400 FIRST STREET SOUTH, STE 300 ST. CLOUD, MN 56301
Effective Date:	11/20/1998
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ING AMERICA INSURANCE HOLDINGS, INC ON NOVEMBER 20, 1998 PURCHASED THE PARENT COMPANY OF COMPULIFE INVESTOR SERVICES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING AMERICA INSURANCE HOLDINGS, INC PURCHASED EQUITABLE OF IOWA COMPANIES WHICH IS A SOLE SHAREHOLDER OF LOCUST STREET

Firm Operations



Organization Affiliates (continued)

SECURITIES.

IFG ADVISORY SERVICES, INC. is under common control with the firm.

Business Address:	3424 PEACHTREET RD, STE 1900 ATLANTA, GA 30326
Effective Date:	11/20/1998
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ING AMERICA INSURANCE HOLDINGS, INC. ON NOVEMBER 20, 1998 PURCHASED THE PARENT COMPANY OF IFG ADVISORY SERVICES, INC. PREVIOUSLY ON OCTOBER 23, 1997, ING AMERICA INSURANCE HOLDINGS, INC PURCHASED EQUITABLE OF IOWA COMPANIES WHICH IS A SOLE SHAREHOLDER OF LOCUST STREET SECURITIES.

IFG NETWORK SECURITIES, INC. is under common control with the firm.

CRD #:	19948
Business Address:	3424 PEACHTREE RD, STE 1900 ATLANTA, GA 30326
Effective Date:	11/20/1998
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	ING AMERICAN HOLDINGS, INC. ON NOVEMBER 20, 1998 PURCHASED THE PARENT COMPANY OF IFG NETWORK SECURITIES, INC. PREVIOUSLY, ON OCTOBER 23, 1997, ING AMERICA INSURANCE HOLDINGS, INC. PURCHASED EQUITABLE OF IOWA COMPANIES WHICH IS THE SOLE SHAREHOLDER OF LOCUST STREET SECURITIES, INC.

MULTI-FINANCIAL SECURITIES CORPORATION is under common control with the firm.

CRD #:	10299
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Firm Operations



Organization Affiliates (continued)

Business Address:	1290 BROADWAY DENVER, CO 80203
Effective Date:	09/11/2002
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	ON MAY 1, 1998 ING AMERICAN INSURANCE HOLDINGS, INC. PURCHASED MULTI FINANCIAL SECURITIES CORP. PREVIOUSLY ON OCTOBER 23, 1997, ING AMERICA INSURANCE HOLDINGS, INC. PURCHASED EQUITABLE OF IOWA COMPANIES, WHICH IS A SOLE SHAREHOLDER OF LOCUST STREET SECURITIES.

VESTAX SECURITIES CORPORATION is under common control with the firm.

CRD #:	10332
Business Address:	1931 GEORGETOWN RD HUDSON, OH 44236
Effective Date:	10/23/1997
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	ON MAY 28, 1997, ING AMERICA INSURANCE HOLDINGS, INC. PURCHASED VESTAX SECURITIES CORP. SUBSEQUENTLY, ON OCTOBER 23, 1997 ING AMERICA INSURANCE HOLDINGS, INC. PURCHASED EQUITABLE OF IOWA COMPANIES, WHICH IS THE SOLE SHAREHOLDER OF LOCUST STREET SECURITIES.

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank

Firm Operations



Organization Affiliates (continued)

- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	2	0
Arbitration	N/A	2	N/A



Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - A final 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 involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 2

Reporting Source: Regulator

Current Status: Final



Allegations: DEFENDANT, A REGISTERED BROKER-DEALER, OMITTED MATERIAL FACTS, ENGAGED IN A PRACTICE AND COURSE OF BUSINESS WHICH OPERATED AS FRAUD AND DECEIT UPON INVESTORS, MISREPRESENTED MATERIAL FACTS, SOLD UNSUITABLE SECURITIES BEING IN THE FORM OF PROMISSORY NOTES, INVESTMENT CONTRACT AND SOLD UNREGISTERED SECURITIES. FAILED TO EXERCISE DILIGENT SUPERVISION OVER THE ACTIVITIES OF HENRY M. AKIN, III AND FAILED TO ANNUALLY INSPECT MR. AKIN'S BUSINESS OFFICE.

Initiated By: DIVISION OF SECURITIES - VIRGINIA

Date Initiated: 08/31/2000

Docket/Case Number: SEC000058

URL for Regulatory Action:

Principal Product Type: Investment Contract(s)

Other Product Type(s): INVESTMENT CONTRACTS AND PROMISSORY NOTES.

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 08/31/2000

Sanctions Ordered: Monetary/Fine \$8,000.00

Other Sanctions Ordered: REIMBURSE THREE VIRGINIA RESIDENTS.

Sanction Details: PAID \$8,000 FINE AND \$1,900 FOR COSTS OF INVESTIGATION.

Regulator Statement BY ORDER DATED AUGUST 31, 2000, THE DEFENDANT AGREED, WITHOUT ADMITTING NOR DENYING THE ALLEGATIONS, TO REIMBURSE THREE VIRGINIA RESIDENTS FOR LOSSES ON THE SECURITIES SALES, PROVIDE EACH INVESTOR WITH A COPY OF THE ORDER, EXERCISE DILIGENT SUPERVISION OF ITS AGENTS, PAY \$8,000 TO THE COMMISSION AND \$1,900 FOR THE COSTS OF THE INVESTIGATION.

Reporting Source: Firm

Current Status: Final

Allegations: STATE OF VIRGINIA HAS ALLEGED THAT LSSI FAILED TO EXERCISE DILIGENT SUPERVISION OVER SECURITIES ACTIVITIES OF A FORMER LSSI REPRESENTATIVE AND FAILED TO ANNUALLY INSPECT THE



REPRESENTATIVE'S BUSINESS LOCATION.

Initiated By: COMMONWEALTH OF VIRGINIA, STATE CORPORATION COMMISSION

Date Initiated: 06/26/2000

Docket/Case Number: SEC000058

Principal Product Type: Other

Other Product Type(s): PROMISSORY NOTE

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: SETTLEMENT ORDER - \$8,000.00 MONETARY FINE

Resolution: Order

Resolution Date: 08/31/2000

Sanctions Ordered: Monetary/Fine \$8,000.00

Other Sanctions Ordered:

Sanction Details: ON AUGUST 21, 2000, LSSI PAID TO THE STATE OF VIRGINIA A FINE IN THE AMOUNT OF \$8,000.00, AND PAID RESTITUTION TO EACH OF THREE CLIENTS WHO PURCHASED PROMISSORY NOTES FROM A FORMER LSSI REPRESENTATIVE. THE AMOUNTS OF RESTITUTION WERE \$31,542.16, \$34,446.24 AND \$28,880.47.

Firm Statement ON JUNE 26, 2000, THE STATE OF VIRGINIA SECURITIES DIVISION ALLEGED THAT LSSI FAILED TO ADEQUATELY SUPERVISE AND INSPECT THE ACTIVITIES OF A FORMER REPRESENTATIVE. CONSEQUENTLY, LSSI ENTERED INTO A SETTLEMENT WITH EACH OF THREE CLIENTS WHO MADE CLAIMS AGAINST THE FIRM IN RELATION TO THE FORMER REPRESENTATIVE SALES OF PROMISSORY NOTES.

Disclosure 2 of 2

Reporting Source: Regulator

Current Status: Final

Allegations: NASD RULES 2110 AND 3010 - RESPONDENT MEMBER FAILED TO IMPLEMENT AND ENFORCE ADEQUATE WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.



Date Initiated: 03/13/2000

Docket/Case Number: C04000011

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/13/2000

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, LOCUST STREET SECURITIES CONSENTED TO THE DESCRIBED SANCTION AND TO THE ENTRY OF FINDINGS, THEREFORE, THE FIRM IS FINED \$5,000.

Reporting Source: Firm

Current Status: Final

Allegations: IT WAS ALLEGED THAT LSSI FAILED TO IMPLEMENT AND ENFORCE ADEQUATE WRITTEN SUPERVISORY PROCEDURES DESIGNED TO ACHIEVE COMPLIANCE WITH SECURITIES LAWS AND REGULATIONS. SPECIFICALLY NO PROVISIONS WERE MADE FOR NON-BRANCH LOCATION INSPECTIONS AND ANNUAL COMPLIANCE MEETINGS, THE DESCRIPTION OF SUPERVISORY PERSONNEL DUTIES WAS INADEQUATE, SUPERVISORY PROCEDURES FOR REVIEW OF MUTUAL FUNDS AND VARIABLE PRODUCTS WERE NOT REASONABLY DESIGNED TO DETECT UNSUITABLE RECOMMENDATIONS, AND PROCEDURES DID NOT PROVIDE ADEQUATE INFORMATION REGARDING ALL INDIVIDUALS RESPONSIBLE FOR SUPERVISING THE FIRMS SPECIFIC TYPES OF BUSINESS.

Initiated By: NASD REGULATION, INC



Date Initiated: 03/13/2000

Docket/Case Number: C04000011

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/13/2000

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: A FINE OF \$5,000.00 WAS LEVIED AGAINST LSSI. THE FINE WAS PAID BY CHECK, AND WAS SUBMITTED TO NASDR IN AUGUST 1999, WHEN LSSI ORGINIALLY SUBMITTED THE AWC.

Firm Statement IN AUGUST 1999, LSSI SUBMITTED TO NASD REGULATION, INC. A LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC). ON MARCH 13, 2000, THIS AWC WAS ACCEPTED BY THE NASD REGULATION, INC'S OFFICE OF DISCLIPINARY AFFAIRS AND THE NAC, AND A \$5000 SANCTION WAS IMPOSED ON LSSI. LSSI ACCEPTED AND CONSENTED TO, WITHOUT ADMITTING OR DENYING, THE NASD REGULATION, INC'S ENTRY OF FINDINGS THAT LSSI FAILED TO IMPLEMENT AND ENFORCE ADEQUATE WRITTEN SUPERVISORY PROCEDURES. CONSEQUENTLY, LSSI HAS REVISED ITS WRITTEN SUPERVISORY PROCEDURES TO REMEDY THE ALLEGED DEFICIENCIES.



Arbitration Award - Award / Judgment

Brokerage firms are not required to report arbitration claims filed against them by customers; however, BrokerCheck provides summary information regarding FINRA arbitration awards involving securities and commodities disputes between public customers and registered securities firms in this section of the report.

The full text of arbitration awards issued by FINRA is available at www.finra.org/awardsonline.

Disclosure 1 of 2

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-UNAUTHORIZED TRADING; ACCOUNT RELATED-FAILURE TO SUPERVISE; NO OTHER CONTROVERSY INVOLVED
Arbitration Forum:	NASD
Case Initiated:	06/14/2002
Case Number:	02-03389
Disputed Product Type:	NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested:	\$13,000,000.01
Disposition:	AWARD AGAINST PARTY
Disposition Date:	01/13/2005
Sum of All Relief Awarded:	\$2,650,000.00

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

Disclosure 2 of 2

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; NO OTHER CONTROVERSY INVOLVED
Arbitration Forum:	NASD
Case Initiated:	04/27/1992
Case Number:	92-01407
Disputed Product Type:	ANNUITIES; NO OTHER TYPE OF SEC INVOLVE; REAL ESTATE INVESTMENT



TRUST

Sum of All Relief Requested:	\$107,785.94
Disposition:	AWARD AGAINST PARTY
Disposition Date:	05/17/1993
Sum of All Relief Awarded:	\$8,662.00

There may be a non-monetary award associated with this arbitration.
Please select the Case Number above to view more detailed information.

End of Report



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