

BrokerCheck Report

TALCOTT RESOLUTION DISTRIBUTION COMPANY, INC.

CRD# 37819

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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.

• **Thank you for using FINRA BrokerCheck.**



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.



TALCOTT RESOLUTION DISTRIBUTION COMPANY, INC.

CRD# 37819

SEC# 8-48097

Main Office Location

ONE AMERICAN ROW
HARTFORD, CT 06103
Regulated by FINRA Boston Office

Mailing Address

ONE AMERICAN ROW
HARTFORD, CT 06103

Business Telephone Number

860-791-0000

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 Connecticut on 08/24/1994.

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 firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 52 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 2 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

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	1
Arbitration	1

The number of disclosures from non-registered control affiliates is 1



Firm Profile

This firm is classified as a corporation.

This firm was formed in Connecticut on 08/24/1994.

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.

TALCOTT RESOLUTION DISTRIBUTION COMPANY, INC.

Doing business as TALCOTT RESOLUTION DISTRIBUTION COMPANY, INC.

CRD# 37819

SEC# 8-48097

Main Office Location

ONE AMERICAN ROW
HARTFORD, CT 06103

Regulated by FINRA Boston Office

Mailing Address

ONE AMERICAN ROW
HARTFORD, CT 06103

Business Telephone Number

860-791-0000



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): TALCOTT HOLDINGS, LP

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

Position PARENT OF APPLICANT

Position Start Date 07/2025

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): CONNER, CHRISTOPHER SCOTT
2239639

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

Position CHIEF COMPLIANCE OFFICER AND DIRECTOR

Position Start Date 03/2009

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): DAGNAULT, CHRISTOPHER JOHN
2311161

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

Position CEO, PRESIDENT AND DIRECTOR

Position Start Date 09/2013



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? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): MATTHEWS, STILA HSUANPING
5745148

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

Position AML OFFICER AND ASSISTANT SECRETARY

Position Start Date 08/2023

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): ROSA, ANTONIO T JR
6963656

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

Position FINOP, CFO AND TREASURER

Position Start Date 08/2024

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



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	TALCOTT FINANCIAL GROUP INVESTMENTS, LLC
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	TALCOTT FINANCIAL GROUP, LTD.
Relationship to Direct Owner	SOLE STOCKHOLDER
Relationship Established	01/2021
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):	TALCOTT FINANCIAL GROUP, LTD.
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	TALCOTT FINANCIAL GROUP GP, LLC
Relationship to Direct Owner	SOLE MEMBER
Relationship Established	01/2021
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):	TALCOTT FINANCIAL GROUP, LTD.
Is this a domestic or foreign entity or an individual?	Foreign Entity



Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established TALCOTT US HOLDINGS, LTD.

Relationship to Direct Owner OWNER

Relationship Established 04/2024

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): TALCOTT US HOLDINGS, LTD.

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

Company through which indirect ownership is established TALCOTT HOLDINGS, LP

Relationship to Direct Owner LIMITED PARTNER

Relationship Established 04/2024

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): TAO SUTTON HOLDINGS, LLC

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

Company through which indirect ownership is established TALCOTT FINANCIAL GROUP INVESTMENTS, LLC

Relationship to Direct Owner MEMBER

Relationship Established 01/2021

Firm Profile



Indirect Owners (continued)

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): SIXTH STREET TAO PARTNERS (C), L.P.

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

Company through which indirect ownership is established TAO SUTTON PARENT, LLC

Relationship to Direct Owner MEMBER

Relationship Established 05/2021

Percentage of Ownership 25% but less than 50%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): TAO SUTTON PARENT, LLC

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

Company through which indirect ownership is established TAO SUTTON HOLDINGS, LLC

Relationship to Direct Owner MEMBER

Relationship Established 04/2021

Percentage of Ownership 25% but less than 50%

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

Is this a public reporting company? No

Firm Profile



Indirect Owners (continued)
company?

Legal Name & CRD# (if any):	TALCOTT FINANCIAL GROUP GP, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	TALCOTT HOLDINGS, LP
Relationship to Direct Owner	GENERAL PARTNER
Relationship Established	06/2021
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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 currently registered with the SEC, 1 SRO and 52 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	03/20/1995

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	03/20/1995



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	06/14/1995
Alaska	Approved	05/03/1995
Arizona	Approved	05/30/1995
Arkansas	Approved	05/18/1995
California	Approved	04/20/1995
Colorado	Approved	03/22/1995
Connecticut	Approved	03/08/1995
Delaware	Approved	03/27/1995
District of Columbia	Approved	01/31/1995
Florida	Approved	05/02/1995
Georgia	Approved	05/17/1995
Hawaii	Approved	05/09/1995
Idaho	Approved	05/02/1995
Illinois	Approved	03/28/1995
Indiana	Approved	05/04/1995
Iowa	Approved	03/24/1995
Kansas	Approved	03/29/1995
Kentucky	Approved	03/21/1995
Louisiana	Approved	06/08/1995
Maine	Approved	06/08/1995
Maryland	Approved	03/30/1995
Massachusetts	Approved	05/17/1995
Michigan	Approved	06/08/1995
Minnesota	Approved	05/12/1995
Mississippi	Approved	04/17/1995
Missouri	Approved	05/17/1995
Montana	Limited	03/27/1995
Nebraska	Limited	04/14/1995
Nevada	Approved	05/24/1995
New Hampshire	Approved	06/22/1995
New Jersey	Approved	05/24/1995
New Mexico	Approved	04/21/1995
New York	Approved	04/25/1995

U.S. States & Territories	Status	Date Effective
North Carolina	Limited	05/23/1995
North Dakota	Limited	04/27/1995
Ohio	Approved	06/21/1995
Oklahoma	Approved	06/01/1995
Oregon	Approved	05/19/1995
Pennsylvania	Approved	05/18/1995
Puerto Rico	Approved	11/18/2003
Rhode Island	Approved	03/28/1995
South Carolina	Approved	04/03/1995
South Dakota	Approved	04/21/1995
Tennessee	Approved	06/02/1995
Texas	Limited	06/06/1995
Utah	Approved	04/04/1995
Vermont	Approved	06/02/1995
Virginia	Approved	04/26/1995
Washington	Limited	04/25/1995
West Virginia	Approved	03/21/1995
Wisconsin	Approved	04/11/1995
Wyoming	Approved	04/17/1995

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 2 types of businesses.

Types of Business

Mutual fund underwriter or sponsor

Broker or dealer selling variable life insurance or annuities

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 not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



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

Name: REGED, INC.

Business Address: 2100 GATEWAY CENTRE BOULEVARD
MORRISVILLE, NC 27560

Effective Date: 03/10/2023

Description: REGED'S ADVERTISING REVIEW APPLICATION IS USED TO MANAGE AND RETAIN THE REGISTRANT'S RECORDS RELATING TO APPROVAL OF COMMUNICATION WITH THE PUBLIC AND OTHER INTERNAL/INSTITUTIONAL COMMUNICATIONS.

Name: MICROSOFT

Business Address: ONE MICROSOFT WAY
REDMOND, WA 98052-6399

Effective Date: 07/22/2019

Description: MICROSOFT PROVIDES CLOUD-BASED 17A-4 WORM COMPLIANT STORAGE FOR EMAIL ARCHIVES.

Name: TALCOTT RESOLUTION LIFE, INC.

Business Address: ONE AMERICAN ROW
HARTFORD, CT 06103

Effective Date: 07/02/2019

Description: TALCOTT RESOLUTION LIFE, INC., PARENT ENTITY OF THE REGISTRANT, MAINTAINS CERTAIN BOOKS AND RECORDS ON BEHALF OF REGISTRANT AND ENGAGES THE VENDORS NAMED IN THE INDUSTRY ARRANGEMENTS SECTION.

Name: IRON MOUNTAIN RECORD MANAGEMENT

Business Address: 455 DUNKSFERRY RD
BENSALEM, PA 19020

Effective Date: 12/03/2012

Description: IRON MOUNTAIN MAINTAINS ARCHIVED BOOKS & RECORDS FOR THE REGISTRANT BEYOND TWO YEARS, FOR THE REMAINING REQUIRED RETENTION PERIOD.

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

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

Firm Operations



Industry Arrangements (continued)

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.**

SIXTH STREET LENDING PARTNERS ADVISERS, LLC is under common control with the firm.

CRD #:	320821
Business Address:	2100 MCKINNEY AVENUE SUITE 1500 DALLAS, TX 75201
Effective Date:	04/29/2022
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	MR. ALAN WAXMAN INDIRECTLY CONTROLS SIXTH STREET LENDING PARTNERS ADVISERS, LLC AND IS THE INDIRECT CONTROL PERSON OF THE APPLICANT.

SIXTH STREET BD, LLC is under common control with the firm.

CRD #:	281933
Business Address:	888 SEVENTH AVENUE 41ST FLOOR NEW YORK, NY 10106
Effective Date:	06/30/2021
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No

Firm Operations



Organization Affiliates (continued)

Description: MR. ALAN WAXMAN INDIRECTLY CONTROLS SIXTH STREET BD, LLC AND IS AN INDIRECT CONTROL PERSON OF THE APPLICANT.

SIXTH STREET SPECIALTY LENDING ADVISERS, LLC is under common control with the firm.

CRD #: 155006

Business Address: 2100 MCKINNEY AVENUE
SUITE 1500
DALLAS, TX 75201

Effective Date: 06/30/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: MR. ALAN WAXMAN INDIRECTLY CONTROLS SIXTH STREET SPECIALTY LENDING ADVISERS, LLC AND IS AN INDIRECT CONTROL PERSON OF THE APPLICANT.

SIXTH STREET ADVISERS, LLC is under common control with the firm.

CRD #: 159014

Business Address: 2100 MCKINNEY AVENUE
SUITE 1500
DALLAS, TX 75201

Effective Date: 06/30/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: MR. ALAN WAXMAN INDIRECTLY CONTROLS SIXTH STREET ADVISERS, LLC AND IS AN INDIRECT CONTROL PERSON OF THE APPLICANT.

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

- bank holding company

Firm Operations



Organization Affiliates (continued)

- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- 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	1	0
Arbitration	N/A	1	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 1

Reporting Source: Regulator

Current Status: Final



Allegations: SEC ADMINISTRATIVE PROCEEDING RELEASE 33-8750, SECURITIES EXCHANGE ACT 34-54720, INVESTMENT ADVISERS RELEASE 40-2567, INVESTMENT COMPANY RELEASE 40-27549, NOVEMBER 8, 2006: HARTFORD DISTRIBUTION CAUSED AND WILLFULLY AIDED AND ABETTED OTHER RESPONDENT FIRM'S VIOLATIONS OF SECTIONS 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT AND SECTION 206(2) THE ADVISERS ACT.

FROM AT LEAST JANUARY 2000 THROUGH DECEMBER 2003, RESPONDENT FIRMS, WITH HARTFORD DISTRIBUTION'S KNOWLEDGE, MADE MATERIAL MISREPRESENTATIONS AND OMITTED TO STATE MATERIAL FACTS TO THE RETAIL AND HLS FUNDS' (COLLECTIVELY THE "FUNDS") SHAREHOLDERS AND BOARDS OF DIRECTORS RELATING TO THEIR USE OF \$51 MILLION OF FUND ASSETS IN THE FORM OF DIRECTED BROKERAGE COMMISSIONS TO SATISFY FINANCIAL OBLIGATIONS TO CERTAIN BROKER-DEALERS FOR THE MARKETING AND DISTRIBUTION OF THE RETAIL AND HLS FUNDS.

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 11/08/2006

Docket/Case Number: 3-12476

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 11/08/2006

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: Censure
Monetary/Fine \$15,000,000.00
Disgorgement/Restitution
Cease and Desist/Injunction

Other Sanctions Ordered: UNDERTAKINGS: A. THE RESPONDENTS FORMED A DISCLOSURE REVIEW COMMITTEE DESIGNED TO ENSURE THAT PROSPECTUS AND SAI DISCLOSURES FOR INVESTMENT PRODUCTS ARE ACCURATE,



APPROPRIATE, TIMELY AND, WHERE APPROPRIATE, CONSISTENT. THE COMMITTEE INCLUDES SENIOR BUSINESS LEADERS, COMPLIANCE OFFICERS AND ATTORNEYS.

B. THE RESPONDENTS HAVE APPOINTED A SENIOR LEVEL EMPLOYEE TO IMPLEMENT WRITTEN POLICIES AND PROCEDURES.

WITHIN 90 DAYS OF THE ENTRY OF THE ORDER, THE RESPONDENTS SHALL APPOINT A SENIOR LEVEL EMPLOYEE RESPONSIBLE FOR OVERSIGHT OF RELATED COMPLIANCE MATTERS. SHALL ANNUALLY SUBMIT, FOR REVIEW AND APPROVAL ANY CHANGES IN THE DISCLOSURES IN FUNDS' PROSPECTUSES AND ESTABLISH AN INTERNAL COMPLIANCE CONTROLS COMMITTEE.

Sanction Details:

WITHOUT ADMITTING OR DENYING THE FINDINGS, RESPONDENT CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF THIS ORDER; ACCORDINGLY, PURSUANT TO SECTION 8A OF THE SECURITIES ACT, SECTION 15(B) OF THE EXCHANGE ACT, SECTIONS 203(E) AND 203(K) OF THE ADVISERS ACT, AND SECTIONS 9(B) AND 9(F) OF THE INVESTMENT COMPANY ACT, IT IS HEREBY ORDERED THAT RESPONDENT IS CENSURED, AND SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(2) AND 17(A)(3) OF THE SECURITIES ACT AND CEASE AND DESIST FROM CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 206(2) OF THE ADVISERS ACT.

THE RESPONDENT SHALL, WITHIN 30 DAYS OF THE ENTRY OF THIS ORDER, PAY DISGORGEMENT IN THE AMOUNT OF \$40 MILLION AND CIVIL MONEY PENALTIES IN THE AMOUNT OF \$15 MILLION, FOR WHICH IT SHALL BE JOINTLY AND SEVERALLY LIABLE. THE RESPONDENT AND THE OTHER RESPONDENTS SHALL PAY THE ENTIRE \$55 MILLION TO THE AFFECTED HARTFORD FUNDS

Regulator Statement

SEC ADMINISTRATIVE PROCEEDING RELEASE 33-8752, NOVEMBER 16, 2006: BASED ON THE REPRESENTATIONS IN THE RESPONDENT'S MARCH 16, 2006 REQUEST LETTER, THE COMMISSION HAS DETERMINED THAT, PURSUANT TO RULE 602(E), A SHOWING OF GOOD CAUSE HAD BEEN MADE AND THAT THE REQUEST FOR A WAIVER OF THE DISQUALIFICATION SHOULD BE GRANTED. ACCORDINGLY, IT IS ORDERED THAT A WAIVER OF THE DISQUALIFICATION PROVISION OF RULE 602(C)(3) UNDER THE SECURITIES ACT RESULTING FROM THE ENTRY OF THE ORDER IS HEREBY GRANTED.

SEC ADMIN RELEASES 33-10438, 34-82151, IA RELEASE 40-4813, INVESTMENT COMPANY ACT RELEASE 40-32906, NOVEMBER 22, 2017: THE RESPONDENT HAS SUBMITTED AN AMENDED OFFER OF SETTLEMENT, WHICH THE COMMISSION HAS DETERMINED TO ACCEPT, PROPOSING TO



MODIFY THE COMMISSION'S 2006 ORDER TO: RELIEVE THE RESPONDENT OF THE OBLIGATION TO MAINTAIN A DISCLOSURE REVIEW COMMITTEE IN ACCORDANCE WITH PARAGRAPH 35.A OF THE 2006 ORDER; RELIEVE THE RESPONDENT OF THE OBLIGATION TO MAINTAIN AN INTERNAL COMPLIANCE CONTROLS COMMITTEE IN ACCORDANCE WITH PARAGRAPHS 36.D - 36.H OF THE 2006 ORDER; MODIFY THE REQUIREMENTS REGARDING REVENUE SHARING POLICIES IN ACCORDANCE WITH PARAGRAPH 35.B OF THE 2006 ORDER; AND MODIFY THE REQUIREMENTS REGARDING ANNUAL COMPLIANCE TRAINING IN ACCORDANCE WITH PARAGRAPH 36.I OF THE 2006 ORDER. SOLELY FOR PURPOSES OF THESE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION, OR TO WHICH THE COMMISSION IS A PARTY, AND WITHOUT ADMITTING OR DENYING THE FINDINGS HEREIN, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER THEM AND THE SUBJECT MATTER OF THESE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENTS CONSENT TO THE ENTRY OF THIS ORDER MODIFYING ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933, SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934, SECTIONS 203(E) AND 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940, AND SECTIONS 9(B) AND 9(F) OF THE INVESTMENT COMPANY ACT OF 1940.

ACCORDINGLY, IT IS HEREBY ORDERED THAT THE RELEVANT PARAGRAPHS OF THE 2006 ORDER BE MODIFIED. ALL OTHER PROVISIONS OF THE 2006 ORDER REMAIN IN EFFECT.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE SEC ALLEGED THAT HARTFORD INVESTMENT FINANCIAL SERVICES, LLC (HIFS) AND HL INVESTMENT ADVISORS (HL ADVISORS) VIOLATED SECTIONS 17(A)(2) AND (3) OF THE SECURITIES ACT OF 1933, SECTION 206(2) OF THE INVESTMENT ADVISERS ACT OF 1940, AND SECTION 34(B) OF THE INVESTMENT COMPANY ACT OF 1940 THROUGH MISREPRESENTATIONS OR OMISSIONS OF FACT CONCERNING THE USE OF DIRECTED BROKERAGE IN CONNECTION WITH THE MARKETING AND DISTRIBUTION OF HARTFORD MUTUAL FUNDS AND ANNUITIES. THE SEC ALLEGED THAT HARTFORD SECURITIES DISTRIBUTION COMPANY, INC. (HSD) CAUSED AND AIDED AND ABETTED THE ALLEGED VIOLATIONS BY HIFS AND HL ADVISORS OF SECTIONS 17(A)(2) AND (3) OF THE SECURITIES ACT OF 1933 AND SECTION 206(2) OF THE INVESTMENT ADVISERS ACT OF 1940.



Initiated By:	SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	11/08/2006
Docket/Case Number:	3-12476
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	THE HARTFORD MUTUAL FUNDS AND HARTFORD HLS SERIES FUNDS
Principal Sanction(s)/Relief Sought:	Disgorgement
Other Sanction(s)/Relief Sought:	CEASE AND DESIST, UNDERTAKING, CENSURE, CIVIL AND ADMINISTRATIVE PENALTIES
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	11/22/2017
Sanctions Ordered:	Censure Monetary/Fine \$15,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	HIFS, HL ADVISORS AND HSD HAVE VOLUNTARILY UNDERTAKEN OR OTHERWISE AGREED TO: (1) FORM A DISCLOSURE REVIEW COMMITTEE DESIGNED TO ENSURE THAT ALL PROSPECTUS AND SAI DISCLOSURES FOR INVESTMENT PRODUCTS ARE ACCURATE; STRENGTHEN OVERSIGHT OVER COMPLIANCE MATTERS RELATED TO PREVENTING AND DETECTING CONFLICTS OF INTERESTS, BREACHES OF FIDUCIARY DUTY, AND VIOLATION OF FEDERAL SECURITIES LAWS RELATED TO INVESTMENT PRODUCTS; (2) ENSURE THE RESPONDENTS' BOARDS OF DIRECTORS REVIEW AND APPROVE DISCLOSURES CONCERNING CERTAIN PAYMENTS MADE TO BROKER DEALERS AND OTHER INTERMEDIARIES; AND (3) STRENGTHEN OVERALL COMPLIANCE OVERSIGHT PROVIDED WITHIN HIFS, HL ADVISORS AND HSD.
Sanction Details:	THE RESPONDENTS ARE REQUIRED TO PAY DISGORGEMENT OF \$40 MILLION AND CIVIL MONETARY PENALTIES OF \$15 MILLION TO THE AFFECTED HARTFORD MUTUAL FUNDS WITHIN 30 DAYS OF NOVEMBER 8, 2006.
Firm Statement	ON NOVEMBER 8, 2006, THE SEC ISSUED AN ORDER THAT INSTITUTED ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS, MADE CERTAIN FINDINGS RELATIVE TO THESE PROCEEDINGS AND IMPOSED REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER PURSUANT TO SECTION 8A OF THE SECURITIES ACT OF 1933, SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934, SECTIONS 203(E) AND 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940, AND SECTIONS 9(B) AND 9(F) OF THE



INVESTMENT COMPANY ACT OF 1940. ALSO ON NOVEMBER 8, 2006, THE RESPONDENTS SETTLED THIS MATTER WITHOUT ADMITTING OR DENYING THE FINDINGS SET FORTH IN THE SEC'S NOVEMBER 8, 2006 ORDER. PLEASE SEE RESPONSE TO QUESTION 12 FOR A DESCRIPTION OF THE RESOLUTION OF THESE PROCEEDINGS.

IN CONNECTION WITH SEC ADMINISTRATIVE PROCEEDING 3-12476, HIFS (NOW KNOWN AS HARTFORD FUNDS DISTRIBUTORS, LLC), HL ADVISORS AND HSD (COLLECTIVELY, "RESPONDENTS") SUBMITTED AN AMENDED OFFER OF SETTLEMENT ("OFFER") TO REQUEST MODIFICATION OF THE SEC'S NOVEMBER 8, 2006 ORDER ("2006 ORDER"). THIS OFFER WAS ACCEPTED BY THE SEC ON NOVEMBER 22, 2017 TO RELIEVE THE RESPONDENTS OF THE OBLIGATION TO MAINTAIN A DISCLOSURE REVIEW COMMITTEE IN ACCORDANCE WITH PARAGRAPH 35.A OF THE 2006 ORDER AND AN INTERNAL COMPLIANCE CONTROLS COMMITTEE IN ACCORDANCE WITH PARAGRAPHS 36.D - 36.H OF THE 2006 ORDER; MODIFY THE REQUIREMENTS REGARDING REVENUE SHARING POLICIES IN ACCORDANCE WITH PARAGRAPH 35.B OF THE 2006 ORDER; AND MODIFY THE REQUIREMENTS REGARDING ANNUAL COMPLIANCE TRAINING IN ACCORDANCE WITH PARAGRAPH 36.I OF THE 2006 ORDER. THE PARAGRAPHS 35.A AND 36.D - 36.I OF THE 2006 ORDER WERE MODIFIED AND ALL OTHER PROVISIONS OF THE 2006 ORDER REMAIN IN EFFECT. THE RESPONDENTS OBLIGATION TO MAINTAIN THE DISCLOSURE REVIEW COMMITTEE AND INTERNAL COMPLIANCE CONTROLS COMMITTEE IS UNTIL NOVEMBER 30, 2017.

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE SEC ALLEGED THAT HARTFORD INVESTMENT FINANCIAL SERVICES, LLC (HIFS) AND HL INVESTMENT ADVISORS (HL ADVISORS) VIOLATED SECTIONS 17(A)(2) AND (3) OF THE SECURITIES ACT OF 1933, SECTION 206(2) OF THE INVESTMENT ADVISERS ACT OF 1940, AND SECTION 34(B) OF THE INVESTMENT COMPANY ACT OF 1940 THROUGH MISREPRESENTATIONS OR OMISSIONS OF FACT CONCERNING THE USE OF DIRECTED BROKERAGE IN CONNECTION WITH THE MARKETING AND DISTRIBUTION OF HARTFORD MUTUAL FUNDS AND ANNUITIES. THE SEC ALLEGED THAT HARTFORD SECURITIES DISTRIBUTION COMPANY, INC. (HSD) CAUSED AND AIDED AND ABETTED THE ALLEGED VIOLATIONS BY HIFS AND HL ADVISORS OF SECTIONS 17(A)(2) AND (3) OF THE SECURITIES ACT OF 1933 AND SECTION 206(2) OF THE INVESTMENT ADVISERS ACT OF 1940.
Initiated By:	SECURITIES AND EXCHANGE COMMISSION



Date Initiated:	11/08/2006
Docket/Case Number:	3-12476
Principal Product Type:	Mutual Fund(s)
Other Product Type(s):	THE HARTFORD MUTUAL FUNDS AND HARTFORD HLS SERIES FUNDS
Principal Sanction(s)/Relief Sought:	Disgorgement
Other Sanction(s)/Relief Sought:	CEASE AND DESIST, UNDERTAKING, CENSURE, CIVIL AND ADMINISTRATIVE PENALTIES
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	11/22/2017
Sanctions Ordered:	Censure Monetary/Fine \$15,000,000.00 Disgorgement/Restitution Cease and Desist/Injunction
Other Sanctions Ordered:	HIFS, HL ADVISORS AND HSD HAVE VOLUNTARILY UNDERTAKEN OR OTHERWISE AGREED TO: (1) FORM A DISCLOSURE REVIEW COMMITTEE DESIGNED TO ENSURE THAT ALL PROSPECTUS AND SAI DISCLOSURES FOR INVESTMENT PRODUCTS ARE ACCURATE; STRENGTHEN OVERSIGHT OVER COMPLIANCE MATTERS RELATED TO PREVENTING AND DETECTING CONFLICTS OF INTERESTS, BREACHES OF FIDUCIARY DUTY, AND VIOLATION OF FEDERAL SECURITIES LAWS RELATED TO INVESTMENT PRODUCTS; (2) ENSURE THE RESPONDENTS' BOARDS OF DIRECTORS REVIEW AND APPROVE DISCLOSURES CONCERNING CERTAIN PAYMENTS MADE TO BROKER DEALERS AND OTHER INTERMEDIARIES; AND (3) STRENGTHEN OVERALL COMPLIANCE OVERSIGHT PROVIDED WITHIN HIFS, HL ADVISORS AND HSD.
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THE FINDINGS SET FORTH IN THE SEC'S NOVEMBER 8, 2006 ORDER. PLEASE SEE RESPONSE TO QUESTION 12 FOR A DESCRIPTION OF THE RESOLUTION OF THESE PROCEEDINGS.

IN CONNECTION WITH SEC ADMINISTRATIVE PROCEEDING 3-12476, HIFS (NOW KNOWN AS HARTFORD FUNDS DISTRIBUTORS, LLC), HL ADVISORS AND HSD (COLLECTIVELY, "RESPONDENTS") SUBMITTED AN AMENDED OFFER OF SETTLEMENT ("OFFER") TO REQUEST MODIFICATION OF THE SEC'S NOVEMBER 8, 2006 ORDER ("2006 ORDER"). THIS OFFER WAS ACCEPTED BY THE SEC ON NOVEMBER 22, 2017 TO RELIEVE THE RESPONDENTS OF THE OBLIGATION TO MAINTAIN A DISCLOSURE REVIEW COMMITTEE IN ACCORDANCE WITH PARAGRAPH 35.A OF THE 2006 ORDER AND AN INTERNAL COMPLIANCE CONTROLS COMMITTEE IN ACCORDANCE WITH PARAGRAPHS 36.D - 36.H OF THE 2006 ORDER; MODIFY THE REQUIREMENTS REGARDING REVENUE SHARING POLICIES IN ACCORDANCE WITH PARAGRAPH 35.B OF THE 2006 ORDER; AND MODIFY THE REQUIREMENTS REGARDING ANNUAL COMPLIANCE TRAINING IN ACCORDANCE WITH PARAGRAPH 36.I OF THE 2006 ORDER. THE PARAGRAPHS 35.A AND 36.D - 36.I OF THE 2006 ORDER WERE MODIFIED AND ALL OTHER PROVISIONS OF THE 2006 ORDER REMAIN IN EFFECT. THE RESPONDENTS OBLIGATION TO MAINTAIN THE DISCLOSURE REVIEW COMMITTEE AND INTERNAL COMPLIANCE CONTROLS COMMITTEE IS UNTIL NOVEMBER 30, 2017.



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 1

Reporting Source:	Regulator
Type of Event:	ARBITRATION
Allegations:	ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY
Arbitration Forum:	NASD
Case Initiated:	11/03/2005
Case Number:	05-04272
Disputed Product Type:	ANNUITIES; NO OTHER TYPE OF SEC INVOLVE; MUTUAL FUNDS
Sum of All Relief Requested:	\$45,000.00
Disposition:	AWARD AGAINST PARTY
Disposition Date:	05/11/2006
Sum of All Relief Awarded:	\$2,606.25

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

Disclosure Events for Non-Registered Control Affiliates



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
Civil Event	0	1	0



Disclosure Event Details

Civil - Final

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	HARTFORD LIFE, INC
Current Status:	Final
Allegations:	THE CIVIL COMPLAINTS FILED BY THE NEW YORK ATTORNEY GENERAL AND THE CONNECTICUT ATTORNEY GENERAL ALLEGED THAT THE HARTFORD FINANCIAL SERVICES GROUP, INC. AND HARTFORD LIFE, INC. (COLLECTIVELY REFERRED TO AS "THE COMPANY") PAID COMPENSATION TO BROKERS OF TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITIES, WHICH WAS NOT FULLY DISCLOSED TO PLAN SPONSORS, TO IMPROPERLY INCENT THE PLACEMENT OF BUSINESS WITH THE COMPANY, IN VIOLATION OF STATE LAW.
Initiated By:	ATTORNEY GENERAL FOR THE STATES OF NEW YORK AND CONNECTICUT
Court Details:	SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK SUPERIOR COURT OF THE STATE OF CONNECTICUT, JUDICIAL DISTRICT OF HARTFORD.
Date Court Action Filed:	05/10/2006
Principal Product Type:	Other
Other Product Types:	SINGLE PREMIUM GROUP (FIXED) ANNUITY
Relief Sought:	Disgorgement
Other Relief Sought:	INJUNCTION, MONETARY DAMAGES, RESTITUTION
Resolution:	Settled
Resolution Date:	05/10/2006
Sanctions Ordered or Relief Granted:	Monetary/Fine \$3,900,000.00
Other Sanctions:	
Sanction Details:	THE COMPANY ENTERED INTO A SETTLEMENT AGREEMENT PRIOR TO ANY COURT MAKING ANY FINDINGS OF FACT OR CONCLUSIONS OF LAW. THE TERMS OF THE SETTLEMENT CALL FOR THE COMPANY TO PAY \$20 MILLION, OF WHICH \$16.1 MILLION WILL BE PAID TO CERTAIN PLAN SPONSORS THAT PURCHASED TERMINAL OR MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITIES BETWEEN JANUARY 1, 1998 AND DECEMBER 31, 2004 WITH THE BALANCE OF \$3.9 MILLION TO BE PAID AS A FINE TO



THE STATES OF NEW YORK AND CONNECTICUT. THE SETTLEMENT ALSO CALLS FOR THE COMPANY TO REFRAIN FOR A PERIOD OF THREE YEARS FROM PAYING CONTINGENT COMPENSATION TO PRODUCERS IN ITS TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITY LINE OF BUSINESS.

Firm Statement

ON MAY 10, 2006 THE HARTFORD FINANCIAL SERVICES GROUP, INC. AND HARTFORD LIFE, INC. (COLLECTIVELY REFERRED TO AS "THE COMPANY") ENTERED INTO A SETTLEMENT AGREEMENT WITH THE NEW YORK ATTORNEY GENERAL AND THE CONNECTICUT ATTORNEY GENERAL THAT RESOLVED INVESTIGATIONS BY THESE AGENCIES INTO THE COMPANY'S PAYMENTS UNDER AN EXPENSE REIMBURSEMENT PROGRAM IN ITS TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITY LINE OF BUSINESS. THE GROUP ANNUITY PRODUCTS IN ISSUE ARE FIXED PRODUCTS AND ARE NOT SECURITIES. THE TERMS OF THE SETTLEMENT CALL FOR THE COMPANY TO PAY \$20 MILLION, OF WHICH \$16.1 MILLION WILL BE PAID TO CERTAIN PLAN SPONSORS THAT PURCHASED TERMINAL OR MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITIES BETWEEN JANUARY 1, 1998 AND DECEMBER 31, 2004 WITH THE BALANCE OF \$3.9 MILLION TO BE PAID AS A FINE TO THE STATES OF NEW YORK AND CONNECTICUT. THE SETTLEMENT ALSO CALLS FOR THE COMPANY TO REFRAIN FOR A PERIOD OF THREE YEARS FROM PAYING CONTINGENT COMPENSATION TO PRODUCERS IN ITS TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITY LINE OF BUSINESS. THE NEW YORK AND CONNECTICUT CIVIL ACTIONS WERE DISMISSED WITH PREJUDICE ON THE SAME DAY THEY WERE COMMENCED, MAY 10, 2006.

Reporting Source:	Firm
Affiliate:	THE HARTFORD FINANCIAL SERVICES GROUP, INC
Current Status:	Final
Allegations:	THE CIVIL COMPLAINTS FILED BY THE NEW YORK ATTORNEY GENERAL AND THE CONNECTICUT ATTORNEY GENERAL ALLEGED THAT THE HARTFORD FINANCIAL SERVICES GROUP, INC. AND HARTFORD LIFE, INC. (COLLECTIVELY REFERRED TO AS "THE COMPANY") PAID COMPENSATION TO BROKERS OF TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITIES, WHICH WAS NOT FULLY DISCLOSED TO PLAN SPONSORS, TO IMPROPERLY INCENT THE PLACEMENT OF BUSINESS WITH THE COMPANY, IN VIOLATION OF STATE LAW.
Initiated By:	ATTORNEY GENERAL FOR THE STATES OF NEW YORK AND CONNECTICUT
Court Details:	SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK SUPERIOR COURT OF THE STATE OF CONNECTICUT, JUDICIAL DISTRICT



OF HARTFORD.

Date Court Action Filed: 05/10/2006

Principal Product Type: Other

Other Product Types: SINGLE PREMIUM GROUP (FIXED) ANNUITY

Relief Sought: Disgorgement

Other Relief Sought: INJUNCTION, MONETARY DAMAGES, RESTITUTION

Resolution: Settled

Resolution Date: 05/10/2006

Sanctions Ordered or Relief Granted: Monetary/Fine \$3,900,000.00

Other Sanctions:

Sanction Details:

THE COMPANY ENTERED INTO A SETTLEMENT AGREEMENT PRIOR TO ANY COURT MAKING ANY FINDINGS OF FACT OR CONCLUSIONS OF LAW. THE TERMS OF THE SETTLEMENT CALL FOR THE COMPANY TO PAY \$20 MILLION, OF WHICH \$16.1 MILLION WILL BE PAID TO CERTAIN PLAN SPONSORS THAT PURCHASED TERMINAL OR MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITIES BETWEEN JANUARY 1, 1998 AND DECEMBER 31, 2004 WITH THE BALANCE OF \$3.9 MILLION TO BE PAID AS A FINE TO THE STATES OF NEW YORK AND CONNECTICUT. THE SETTLEMENT ALSO CALLS FOR THE COMPANY TO REFRAIN FOR A PERIOD OF THREE YEARS FROM PAYING CONTINGENT COMPENSATION TO PRODUCERS IN ITS TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITY LINE OF BUSINESS.

Firm Statement

ON MAY 10, 2006 THE HARTFORD FINANCIAL SERVICES GROUP, INC. AND HARTFORD LIFE, INC. (COLLECTIVELY REFERRED TO AS "THE COMPANY") ENTERED INTO A SETTLEMENT AGREEMENT WITH THE NEW YORK ATTORNEY GENERAL AND THE CONNECTICUT ATTORNEY GENERAL THAT RESOLVED INVESTIGATIONS BY THESE AGENCIES INTO THE COMPANY'S PAYMENTS UNDER AN EXPENSE REIMBURSEMENT PROGRAM IN ITS TERMINAL AND MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITY LINE OF BUSINESS. THE GROUP ANNUITY PRODUCTS IN ISSUE ARE FIXED PRODUCTS AND ARE NOT SECURITIES. THE TERMS OF THE SETTLEMENT CALL FOR THE COMPANY TO PAY \$20 MILLION, OF WHICH \$16.1 MILLION WILL BE PAID TO CERTAIN PLAN SPONSORS THAT PURCHASED TERMINAL OR MATURITY FUNDING SINGLE PREMIUM GROUP ANNUITIES BETWEEN JANUARY 1, 1998 AND DECEMBER 31, 2004 WITH THE BALANCE OF \$3.9 MILLION TO BE PAID AS A FINE TO THE STATES OF NEW YORK AND CONNECTICUT. THE SETTLEMENT ALSO CALLS FOR THE COMPANY TO REFRAIN FOR A PERIOD OF THREE YEARS FROM PAYING CONTINGENT



COMPENSATION TO PRODUCERS IN ITS TERMINAL AND MATURITY
FUNDING SINGLE PREMIUM GROUP ANNUITY LINE OF BUSINESS. THE NEW
YORK AND CONNECTICUT CIVIL ACTIONS WERE DISMISSED WITH
PREJUDICE ON THE SAME DAY THEY WERE COMMENCED, MAY 10, 2006.

End of Report



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