

BrokerCheck Report

Theodore Harry Chiappini Jr

CRD# 2309655

Section Title	Page(s)
Report Summary	1
Broker Qualifications	2 - 5
Registration and Employment History	7
Disclosure Events	8



When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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:
 - o 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
 - o 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.

Theodore H. Chiappini Jr

CRD# 2309655

Currently employed by and registered with the following Firm(s):

EDWARD JONES
53 N MARKET ST SUITE 100
ASHEVILLE, NC 28801
CRD# 250
Registered with this firm since: 01/19/2007

B EDWARD JONES
53 N MARKET ST SUITE 100
ASHEVILLE, NC 28801
CRD# 250
Registered with this firm since: 03/05/1993

Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is registered with:

- 4 Self-Regulatory Organizations
- 35 U.S. states and territories

This broker has passed:

- 0 Principal/Supervisory Exams
- 2 General Industry/Product Exams
- 2 State Securities Law Exams

Registration History

This broker was previously registered with the following securities firm(s):

No information reported.

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? Yes

The following types of disclosures have been reported:

Type Count
Customer Dispute 4



Date

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

Status

This individual is currently registered with 4 SROs and is licensed in 35 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **EDWARD JONES**

Main Office Address: 12555 MANCHESTER ROAD

ST. LOUIS, MO 63131-3710

Category

Firm CRD#: **250**

SRO

	SKU	Category	Status	Date
B	FINRA	General Securities Representative	Approved	03/05/1993
B	NYSE American LLC	General Securities Representative	Approved	09/13/2011
B	Nasdaq Stock Market	General Securities Representative	Approved	07/12/2006
B	New York Stock Exchange	General Securities Representative	Approved	03/29/1993
	U.S. State/ Territory	Category	Status	Date
B	Alabama	Agent	Approved	08/13/2003
B	Arizona	Agent	Approved	08/11/2015
B	Arkansas	Agent	Approved	10/07/2015
B	California	Agent	Approved	09/08/2006
B	Colorado	Agent	Approved	08/23/2018
B	Connecticut	Agent	Approved	10/21/2009
B	Florida	Agent	Approved	06/02/2004
B	Georgia	Agent	Approved	09/05/1996
B	Idaho	Agent	Approved	06/04/2015



Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Illinois	Agent	Approved	12/08/2015
B	Indiana	Agent	Approved	02/05/2007
B	Kentucky	Agent	Approved	08/20/2024
B	Louisiana	Agent	Approved	03/12/2018
B	Maine	Agent	Approved	02/24/2023
B	Maryland	Agent	Approved	03/15/2011
B	Michigan	Agent	Approved	09/26/2012
B	Missouri	Agent	Approved	02/04/2011
B	Montana	Agent	Approved	02/15/2023
B	Nevada	Agent	Approved	05/25/2012
B	New Jersey	Agent	Approved	01/25/2010
B	New York	Agent	Approved	09/03/1999
B	North Carolina	Agent	Approved	04/08/1993
IA	North Carolina	Investment Adviser Representative	Approved	01/19/2007
B	Ohio	Agent	Approved	03/13/2015
B	Oregon	Agent	Approved	06/05/2007
B	Pennsylvania	Agent	Approved	08/05/2011
B	South Carolina	Agent	Approved	01/14/1999
B	South Dakota	Agent	Approved	10/19/2021
B	Tennessee	Agent	Approved	02/13/2013
B	Texas	Agent	Approved	04/26/2004



Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
IA	Texas	Investment Adviser Representative	Restricted Approval	01/10/2019
B	Utah	Agent	Approved	02/19/2009
B	Virginia	Agent	Approved	09/24/2001
B	Washington	Agent	Approved	09/08/2006
B	West Virginia	Agent	Approved	09/02/2009
B	Wisconsin	Agent	Approved	10/04/2022
B	Wyoming	Agent	Approved	10/31/2007

Branch Office Locations

EDWARD JONES53 N MARKET ST SUITE 100
ASHEVILLE, NC 28801



Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

General Industry/Product Exams

Exam		Category	Date
B	Securities Industry Essentials Examination	SIE	10/01/2018
B	General Securities Representative Examination	Series 7	03/03/1993

State Securities Law Exams

Exam	Category	Date
B IA Uniform Combined State Law Examination	Series 66	12/19/2006
B Uniform Securities Agent State Law Examination	Series 63	03/18/1993

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

www.finra.org/brokercheck
User Guidance

Broker Qualifications



Professional Designations

This section details that the representative has reported 1 professional designation(s).

Certified Financial Planner

This representative holds or did hold **1** 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 and Employment History



Registration History

The broker previously was registered with the following firms:

Registration Dates Firm Name CRD# Branch Location

No information reported.

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
11/1992 - Present	EDWARD D. JONES & CO., L.P.	NOT PROVIDED	Υ	ASHEVILLE, NC, United States

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker 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.

No information reported.

Disclosure Events



What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

2. Certain thresholds must be met before an event is reported to CRD, for example:

- o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
- A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

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3. Disclosure events in BrokerCheck reports come from different sources:

 As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage 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 BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.

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4. There are different statuses and dispositions for disclosure events:

- o 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.
- o 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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Customer Dispute	0	4	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a discloure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

Disclosure 1 of 2

Reporting Source: Broker

Employing firm when

activities occurred which led

to the complaint:

Allegations:

EDWARD JONES

CLAIMANT ALLEGES THAT FA MISMANAGED HER JONES ACCOUNT,

RESULTING IN SUBSTANTIAL LOSSES. CLAIMANT ALLEGES THAT FA OVER CONCENTRATED HER PORTFOLIO IN AGGRESSIVE INVESTMENTS AND FAILED TO DIVERSIFY. (DAMAGES SOUGHT: \$330,000 FOR UNSUITABILITY,

BREACH OF FIDUCIARY DUTY, FRAUD, NEGLIGENCE, RESPONDEAT SUPERIOR, AND FOR INTEREST, ATTORNEYS FEES AND COSTS).

Product Type: No Product

Alleged Damages: \$330,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation?

Yes

Arbitration/Reparation forum or court name and location:

FINRA

Docket/Case #: 11-00612

Filing date of arbitration/CFTC reparation

02/22/2011

or civil litigation:



Customer Complaint Information

Date Complaint Received: 02/22/2011

Complaint Pending? No

Status: Settled

Status Date: 01/06/2012

Settlement Amount: \$42,500.00

Individual Contribution

Amount:

\$0.00

Broker Statement SETTLED FOR \$42,500. (1/6/12)

Disclosure 2 of 2

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:

EDWARD JONES

Allegations: 9/1/08-10/6/-08; CLIENTS STATE JUST OVER A YEAR AGO THEIR ACCOUNT

WAS AT \$580,000 AND THEY ASKED THE FA IF THEY SHOULD CONSIDER CASHING OUT OF THEIR ANNUITY AND MOVING IT INTO SOMETHING WITH MORE FLEXABILITY. CLIENTS INDICATE THE FA ADVISED THEM TO HOLD ON TO THE ANNUITY UNTIL OCTOBER 2009 AND NOW THEY INCURRED A \$200,000 LOSS. *****ARBITRATION: CLAIMANTS ALLEGE BREACH OF FIDUCIARY DUTY, FAILURE TO SUPERVISE, MISREPRESENTATION AND SUITABILITY IN RELATION TO THEIR PURCHASE OF A HARTFORD'S LEADERS EDGE ANNUITY. (AMOUNT CLAIMED: IN EXCESS OF \$150,000 PLUS INTEREST, COSTS, ATTORNEYS' FEES AND PUNITIVE DAMAGES.)

Product Type: Annuity-Variable

Alleged Damages: \$5,000.00

Alleged Damages Amount Explanation (if amount not exact):

ALLEGATIONS CLAIM DAMAGES THAT APPEAR TO BE IN EXCESS OF \$5,000

Customer Complaint Information

Date Complaint Received: 10/07/2008

Complaint Pending? No



Status: Denied

Status Date: 12/15/2008

Settlement Amount:

Individual Contribution

Amount:

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA,

CFTC, etc.):

FINRA

Docket/Case #:

10-02541

Date Notice/Process Served:

06/11/2010

Arbitration Pending?

No

Disposition:

Settled

Disposition Date:

05/31/2011

Monetary Compensation

Amount:

\$13,000.00

Individual Contribution

Amount:

\$0.00

Broker Statement

ACCORDING TO FA, HE MET WITH CLIENTS SEVERAL TIMES AND THEY EXPLAINED YOUR NEED FOR INCOME AND MODERATE GROWTH. FA STATED AFTER DISCUSSING VARIOUS INVESTMENT OPTIONS, AN ANNUITY WAS CHOSEN AND THIS WAS REVIEWED WITH THE CLIENTS' CPA. SINCE

THE ANNUITIES WERE PURCHASED IN 2004, THERE ARE NINE

DOCUMENTED REVIEWS OF THE CLIENTS' ACCOUNTS WITH FA AND, IN ADDITION, HE HAS CONTACTED THE CLIENTS BY TELEPHONE ON A QUARTERLY BASIS. ACCORDING TO FA, THE PERFORMANCE OF THE ANNUITIES EXCEEDED EXPECTATIONS EARLY ON; HOWEVER, FA REMINDED THE CLIENTS OF THE RISK OF MARKET FLUCTUATION.

ACCORDING TO FA, CLIENTS BEGAN TO HAVE MARKET FLUCTUATION.
ACCORDING TO FA, CLIENTS BEGAN TO HAVE MARKET JITTERS IN JULY
2008 AND HE RECOMMENDED TO CONTINUE HOLDING THE ANNUITIES AND
PROVIDED AN EXPLANATION OF BEAR MARKETS. FA HAS STATED HE
INFORMED CLIENTS THE ANNUITIES WERE ACTUALLY PERFORMING QUITE
WELL CONSIDERING THE MARKET STRAIN AND TAKING INTO ACCOUNT
THE AMOUNT THE CLIENTS INVESTED AND WITHDRAWALS, WE CONCUR
WITH THE FA'S ASSESSMENT. THROUGHOUT CLIENTS EMAILS AND
TELEPHONE CONVERSATIONS WITH THE HOME OFFICE, THEY HAVE
EXPRESSED THAT THEY ARE CONSERVATIVE INVESTORS; HOWEVER, IT



DOES NOT APPEAR CLIENTS HAD ANY CONCERNS RELATING TO THE ANNUITIES WHEN THE CONTRACTS WERE UP IN VALUE BUT AS THE VALUES HAVE DECLINED YOU ARE NOW QUESTIONING THE SUITABILITY OF FA'S RECOMMENDATION. BASED ON MY REVIEW OF THIS MATTER, IT APPEARS THE FA'S INVESTMENT RECOMMENDATIONS FOR THE CLIENTS ACCOUNTS WERE NOT OUTSIDE THE STATED OBJECTIVES OF THE ACCOUNTS. WHILE WE UNDERSTAND THEIR DISAPPOINTMENT IN THE PERFORMANCE OF THE ANNUITIES, WE HAVE BEEN EXPERIENCING TUMULTUOUS MARKET CONDITIONS AND FLUCTUATION IS A RISK ASSOCIATED WITH OWNING ANY INVESTMENT. AS A RESULT, WE RESPECTFULLY DENY ANY REQUEST FOR REIMBURSEMENT OF LOSSES ASSOCIATED WITH THE ABOVE-REFERENCED ANNUITIES. ARBITRATION SETTLED FOR \$13,000.



Customer Dispute - Closed-No Action / Withdrawn / Dismissed / Denied

This type of disclosure event involves (1) a consumer-initiated, investment-related arbitration or civil suit containing allegations of sales practice violations against the individual broker that was dismissed, withdrawn, or denied; or (2) a consumer-initiated, investment-related written complaint containing allegations that the broker engaged in sales practice violations resulting in compensatory damages of at least \$5,000, forgery, theft, or misappropriation, or conversion of funds or securities, which was closed without action, withdrawn, or denied.

Disclosure 1 of 2

Reporting Source: Regulator

Employing firm when activities occurred which led

to the complaint:

EDWARD D. JONES & CO. LP

Allegations: BREACH OF GENERAL DUTIES OF A STOCKBROKER; UNSUITABILITY;

COMMON LAW FRAUD; FIDUCIARY BREACH; AND, NEGLIGENCE.

THE CAUSES OF ACTION RELATE TO THE PLACEMENT OF CLAIMANT'S IRA FUNDS INTO AN IRS PRE-RETIREMENT DISTRIBUTION PROCESS CALLED A

"72(T)" AND TO MISMANAGEMENT OF THE ACCOUNT.

Product Type: Other: 72(T) PRE-RETIREMENT DISTRIBUTION

Alleged Damages: \$182,632.22

Arbitration Information

Arbitration/Reparation Claim

filed with and Docket/Case

No.:

FINRA - CASE #12-01708

Date Notice/Process Served: 05/08/2012

Arbitration Pending? No

Disposition: Other

Disposition Date: 02/04/2013

Disposition Detail: THEODORE CHIAPPINI WAS A SUBJECT OF THE CUSTOMER'S STATEMENT

OF CLAIM ALLEGING THAT CHIAPPINI AND HIS MEMBER FIRM CAUSED

SALES PRACTICE VIOLATIONS. THE ARBITRATION PANEL FOUND CHIAPPINI'S MEMBER FIRM LIABLE FOR COMPENSATORY DAMAGES IN

THE AMOUNT OF \$20,000.

EDWARD JONES

Reporting Source: Broker

Employing firm when activities occurred which led

to the complaint:



Allegations: CLAIMANT CLIENT ALLEGES THAT FA MADE UNSUITABLE

RECOMMENDATION TO PLACE HIS

IRA RETIREMENT FUND INTO A COMPLEX IRS PRE-RETIREMENT

DISTRIBUTION PROCESS

CALLED 72(T). CLAIMANT ALLEGES THAT RETIREMENT SAVINGS DROPPED

IN VALUE AND

ARE VIRTUALLY GONE DUE TO MATERIAL MISREPRESENTATION AND THE

UNSUITABILITY OF

THE PRODUCT. CLAIMANT ALLEGES THAT JONES NEGLIGENTLY

SUPERVISED ITS FA AND IS

RESPONSIBLE FOR THE FA'S ALLEGED UNSUITABLE RECOMMENDATIONS.

Other: MISCELLANEOUS **Product Type:**

Alleged Damages: \$0.00

Alleged Damages Amount

Explanation (if amount not exact):

UNSPECIFIED RESCISSIONARY DAMAGES FOR COMMON LAW FRAUD,

UNSUITABILITY.

RESPONDEAT SUPERIOR, FIDUCIARY BREACH, NEGLIGENCE, ATTORNEYS

FEES, INTEREST,

COSTS, AND OTHER RELIEF DEEMED JUST AND PROPER

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation?

Yes

Arbitration/Reparation forum or court name and location:

FINRA

Docket/Case #: 12-01708

Filing date of

05/15/2012

arbitration/CFTC reparation

or civil litigation:

Customer Complaint Information

Date Complaint Received: 05/15/2012

Complaint Pending? No

Status: Arbitration Award/Monetary Judgment (for claimants/plaintiffs)

Status Date: 02/04/2013

Settlement Amount: \$20,000.00



Individual Contribution

Amount:

\$0.00

Broker Statement

THEODORE CHIAPPINI WAS A SUBJECT OF THE CUSTOMER'S STATEMENT OF CLAIM ALLEGING THAT CHIAPPINI AND HIS MEMBER FIRM CAUSED SALES PRACTICE VIOLATIONS. THE ARBITRATION PANEL FOUND CHIAPPINI'S MEMBER FIRM LIABLE FOR COMPENSATORY DAMAGES IN THE AMOUNT OF \$20000.00

Disclosure 2 of 2

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint:

EDWARD JONES

Allegations:

6/05-1/09; CLIENT STATES FA SOLD HIM A TAX DEFERRED ANNUITY IN HIS

TAX DEFERRED IRA ACCOUNT. CLIENT STATES THIS WAS NOT

NECESSARY AND BELIEVES HE WAS NOT TOLD ABOUT COMMISSIONS.

CLIENT IS REQUESTING RETURN OF COMMISSIONS.

Product Type: Annuity-Variable

Alleged Damages: \$5,000.00

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: 01/23/2009

Complaint Pending? No

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Status: Denied

Status Date: 05/13/2009

Settlement Amount:

Individual Contribution

Amount:

Broker Statement FA EXPLAINED THAT THE PURPOSE OF THE VARIABLE ANNUITY WAS TO

CREATE A GUARANTEED INCOME STREAM PROVIDED BY THE PRINCIPAL FIRST RIDER, WHICH WAS ALSO OUTLINED AS ONE OF THE REASONS FOR



PURCHASE ON THE 'VARIABLE ANNUITY PURCHASE IN A TAX QUALIFIED ACCOUNT ACKNOWLEDGEMENT LETTER. THE ACCOUNT HISTORY DOES INDICATE REGULAR MONTHLY WITHDRAWALS FROM THE ANNUITY FROM THE TIME OF PURCHASE TO THE PRESENT. FA STATED THAT SALES CHARGES ASSOCIATED WITH THE VARIABLE ANNUITY PURCHASE WERE DISCLOSED DURING THE PRESENTATION MEETING. ADDITIONALLY, INFORMATION PROVIDED WITHIN THE REQUIRED PROSPECTUS AS WELL AS THE 'VARIABLE ANNUITY PURCHASE IN A TAX QUALIFIED ACCOUNT' OUTLINE THE SALES CHARGES ASSOCIATED WITH A SHARE PURCHASES. THEREFORE, THE REQUEST FOR RETURN OF SALES CHARGES WAS DENIED.

End of Report



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