

BrokerCheck Report

METROPOLITAN LIFE INSURANCE COMPANY

CRD# 4095

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

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)



METROPOLITAN LIFE INSURANCE COMPANY

CRD# 4095

SEC# 8-14901

Main Office Location

200 PARK AVENUE
NEW YORK, NY 10166

Mailing Address

1 METLIFE PLAZA
27-01 QUEENS PLAZA NORTH
LONG ISLAND CITY, NY 11101

Business Telephone Number

212-578-9414

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 New York on 03/24/1968.

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 | 11 |
| Civil Event | 1 |
| Arbitration | 6 |

The number of disclosures from non-registered control affiliates is 29

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: 05/01/2007

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 New York on 03/24/1968.

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.

METROPOLITAN LIFE INSURANCE COMPANY

Doing business as METROPOLITAN LIFE INSURANCE COMPANY

CRD# 4095

SEC# 8-14901

Main Office Location

200 PARK AVENUE
NEW YORK, NY 10166

Mailing Address

1 METLIFE PLAZA
27-01 QUEENS PLAZA NORTH
LONG ISLAND CITY, NY 11101

Business Telephone Number

212-578-9414



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): | METLIFE, INC. |
| Is this a domestic or foreign entity or an individual? | Domestic Entity |
| Position | 100% SHAREHOLDER |
| Position Start Date | 04/2000 |
| 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): | BARNETTE, CURTIS HANDLEY |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | DIRECTOR |
| Position Start Date | 09/1994 |
| 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): | DOLE, BURTON A |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | DIRECTOR |
| Position Start Date | 09/1996 |
| 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? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): GRISE, CHERYL

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

Position DIRECTOR

Position Start Date 02/2004

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): HALPERIN, JEFFREY PAUL
2899327

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

Position CHIEF COMPLIANCE OFFICER, INVESTMENT ADVISER & ANTI-MONEY LAUNDERING OFFICER

Position Start Date 08/2006

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): HENRIKSON, CARL ROBERT
243239



Firm Profile

Direct Owners and Executive Officers (continued)

| | |
|---|--|
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | CHIEF EXECUTIVE OFFICER, PRESIDENT & CHAIRMAN OF THE BOARD |
| Position Start Date | 03/2006 |
| 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): | HOLTZER, DAVID MICHAEL 4345697 |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | CHIEF COMPLIANCE OFFICER, BROKER DEALER |
| Position Start Date | 09/2006 |
| 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): | HOUGHTON, JAMES RICHARDSON |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | DIRECTOR |
| Position Start Date | 07/1975 |
| Percentage of Ownership | Less than 5% |
| Does this owner direct the management or policies of the firm? | Yes |

Firm Profile



Direct Owners and Executive Officers (continued)

Is this a public reporting company? No

Legal Name & CRD# (if any): JOURNY, TIMOTHY LYONS

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

Position SENIOR VICE PRESIDENT AND GENERAL AUDITOR

Position Start Date 10/2003

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): KAMEN, HARRY PAUL
1545937

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

Position DIRECTOR

Position Start Date 06/1998

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): KANDARIAN, STEVEN ALBERT

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

Position EXECUTIVE VICE PRESIDENT & CIO

Position Start Date 04/2005

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? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): KAPLAN, HELENE L

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

Position DIRECTOR

Position Start Date 05/1987

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): KEANE, JOHN M.

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

Position DIRECTOR

Position Start Date 10/2003

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): KILTS, JAMES

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

Position DIRECTOR



Firm Profile

Direct Owners and Executive Officers (continued)

Position Start Date 01/2005

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): LEIGHTON, CHARLES

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

Position DIRECTOR

Position Start Date 09/1996

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): LIPSCOMB, JAMES LOUIS

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

Position EXECUTIVE VICE PRESIDENT & GENERAL COUNSEL

Position Start Date 07/2003

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): MATHEWS, SYLVIA



Firm Profile

Direct Owners and Executive Officers (continued)

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

Position DIRECTOR

Position Start Date 01/2004

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): MULLANEY, WILLIAM JOSEPH
2641484

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

Position PRESIDENT, INSTITUTIONAL BUSINESS

Position Start Date 01/2007

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): PRICE, HUGH BERNARD

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

Position DIRECTOR

Position Start Date 10/1994

Percentage of Ownership Less than 5%

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



Firm Profile

Direct Owners and Executive Officers (continued)

| | |
|---|--|
| Is this a public reporting company? | No |
| Legal Name & CRD# (if any): | REIN, CATHERINE AMELIA 2605134 |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | SENIOR EXECUTIVE VICE PRESIDENT AND CHIEF ADMINISTRATIVE OFFICER |
| Position Start Date | 02/1998 |
| 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): | SICCHITANO, KENTON JOSEPH |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | DIRECTOR |
| Position Start Date | 07/2003 |
| 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): | STEERE, WILLIAM CAMPBELL |
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | DIRECTOR |
| Position Start Date | 04/1997 |



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): TOPPETA, WILLIAM JOHN
2835140

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

Position PRESIDENT, INTERNATIONAL

Position Start Date 03/1999

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): VIETRI, MICHAEL JOSEPH
1068983

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

Position EXECUTIVE VICE PRESIDENT

Position Start Date 12/2005

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): WEBER, LISA M



Firm Profile

Direct Owners and Executive Officers (continued)

| | |
|---|--------------------------------|
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | PRESIDENT, INDIVIDUAL BUSINESS |
| Position Start Date | 03/1998 |
| 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): WHEELER, WILLIAM JAMES
1208521

| | |
|---|--|
| Is this a domestic or foreign entity or an individual? | Individual |
| Position | EXECUTIVE VICE PRESIDENT & CHIEF FINANCIAL OFFICER |
| Position Start Date | 12/2003 |
| 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

No information reported.

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 07/31/1969 to 07/09/2007.



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 1 type of business.

Types of Business

Broker or dealer selling variable life insurance or annuities

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does engage in other non-securities business.

Non-Securities Business Description: 11B APPLICANT IS A MUTUAL LIFE INSURANCE COMPANY AUTHORIZED TO TRANSACT BUSINESS IN ALL STATES OF THE UNITED STATES, THE DISTRICT OF COLUMBIA, PUERTO RICO AND ALL PROVINCES OF CANADA.

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 not have books or records maintained by a third party.

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.

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.

METLIFE INVESTMENT ADVISORS COMPANY, LLC is under common control with the firm.

| | |
|--|---------------------------------------|
| CRD #: | 142463 |
| Business Address: | 200 PARK AVENUE NEW YORK, NY 10166 |
| Effective Date: | 11/29/2006 |
| Foreign Entity: | No |
| Country: | |
| Securities Activities: | No |
| Investment Advisory Activities: | Yes |
| Description: | WHOLLY OWNED BY METLIFE, INC. |

METLIFE INVESTMENT FUNDS MANAGEMENT LLC is under common control with the firm.

| | |
|--|--|
| Business Address: | 400 ATRIUM DRIVE SOMERSET, NJ 08873 |
| Effective Date: | 09/01/2005 |
| Foreign Entity: | No |
| Country: | |
| Securities Activities: | No |
| Investment Advisory Activities: | Yes |
| Description: | INDIRECTLY OWNED BY METLIFE, INC. THROUGH METROPOLITAN TOWER LIFE INSURANCE COMPANY NAME CHANGED FROM CITISTREET FUNDS MANAGEMENT TO METLIFE INVESTMENT FUNDS MANAGEMENT LLC 5/06 |

Firm Operations**Organization Affiliates (continued)**

METLIFE INVESTMENT FUND SERVICES LLC is under common control with the firm.

Business Address: 400 ATRIUM DRIVE
SOMERSET, NJ 08873

Effective Date: 09/01/2005

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY METLIFE, INC. THROUGH METROPOLITAN TOWER LIFE INSURANCE COMPANY

NAME CHANGED FROM CITISTREET FINANCIAL SERVICES TO METLIFE INVESTMENT FUND SERVICES LLC ON 5/06

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

CRD #: 833

Business Address: ONE CITYPLACE
18TH FLOOR
HARTFORD, CT 06103

Effective Date: 07/01/2005

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: WHOLLY OWNED BY METLIFE, INC.

METLIFE INVESTORS DISTRIBUTION COMPANY is under common control with the firm.

CRD #: 107622

Business Address: 5 PARK PLAZA
SUITE 1900
IRVINE, CA 92614

Firm Operations**Organization Affiliates (continued)**

Effective Date: 06/21/2004
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: No
Description: INDIRECTLY WHOLLY OWNED BY METLIFE, INC. THROUGH METLIFE INVESTORS GROUP, INC.

METLIFE ADVISERS, LLC is controlled by the firm.

Business Address: 501 BOYLSTON STREET
BOSTON, MA 02116
Effective Date: 03/26/1999
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: INDIRECTLY WHOLLY OWNED BY METROPOLITAN LIFE INSURANCE COMPANY THROUGH NEW ENGLAND LIFE INSURANCE COMPANY.

WALNUT STREET SECURITIES, INC. is under common control with the firm.

CRD #: 15840
Business Address: 13045 TESSON FERRY ROAD
ST. LOUIS, MO 63128
Effective Date: 06/21/2004
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: WHOLLY-OWNED BY METLIFE, INC.

Firm Operations



Organization Affiliates (continued)

METLIFE SECURITIES INC. is under common control with the firm.

CRD #: 14251
Business Address: 200 PARK AVENUE
 NEW YORK, NY 11101
Effective Date: 08/15/1983
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: WHOLLY-OWNED BY METLIFE, INC.

NEW ENGLAND SECURITIES is controlled by the firm.

CRD #: 615
Business Address: 399 BOYLSTON STREET
 BOSTON, MA 02116
Effective Date: 08/30/1996
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: INDIRECTLY WHOLLY-OWNED BY METROPOLITAN LIFE INSURANCE COMPANY THROUGH NEW ENGLAND LIFE INSURANCE COMPANY.

MET INVESTORS ADVISORY LLC is under common control with the firm.

Business Address: 5 PARK PLAZA
 SUITE 1900
 IRVINE, CA 92614
Effective Date: 10/30/1997
Foreign Entity: No
Country:

Firm Operations



Organization Affiliates (continued)

| | |
|--|--|
| Securities Activities: | No |
| Investment Advisory Activities: | Yes |
| Description: | INDIRECTLY WHOLLY-OWNED BY METLIFE, INC. THROUGH METLIFE INVESTORS GROUP, INC. |

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
- 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 | 11 | 0 |
| Civil Event | 0 | 1 | 0 |
| Arbitration | N/A | 6 | 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 11

Reporting Source: Firm
Current Status: Final



| | |
|---|--|
| Allegations: | APPLICANT TRANSACTED VARIABLE INSURANCE BUSINESS IN VERMONT WITHOUT BEING REGISTERED AS A BROKER-DEALER IN VERMONT. |
| Initiated By: | VERMONT SECURITIES DIVISION |
| Date Initiated: | 05/12/2006 |
| Docket/Case Number: | 06-030-S |
| Principal Product Type: | Annuity(ies) - Variable |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Civil and Administrative Penalt(ies) /Fine(s) |
| Other Sanction(s)/Relief Sought: | IN ADDITION TO ABOVE, APPLICANT AGREED TO REGISTER AS A BROKER-DEALER, AND WILL REGISTER ITS BRANCH OFFICE(S) AND AGENTS IN VERMONT. |
| Resolution: | Consent |
| Resolution Date: | 06/13/2006 |
| Sanctions Ordered: | Monetary/Fine \$26,500.00 |
| Other Sanctions Ordered: | IN ADDITION TO ABOVE, APPLICANT MUST REGISTER AS A BROKER-DEALER AND WILL REGISTER ITS BRANCH OFFICE(S) AND AGENTS IN VERMONT. |
| Sanction Details: | APPLICANT AGREED TO (I) PAY AN ADMINISTRATIVE FINE OF \$15,000, (II) PAY BACK-REGISTRATION FEES OF \$11,500 FOR THE FIRM AND IT'S SALES REPRESENTATIVES, AND (III)REGISTER AS A BROKER-DEALER, AND HAVE IT'S BRANCH OFFICE(S) AND AGENTS REGISTERED, EFFECTIVE JULY 1, 2006. |
| Firm Statement | APPLICANT ENTERED INTO THE ORDER WITH VERMONT ON JUNE 13, 2006 AND PAID THE FINES ON JUNE 13, 2006. |

Disclosure 2 of 11

| | |
|--------------------------|--|
| Reporting Source: | Regulator |
| Current Status: | Final |
| Allegations: | SEC ADM. PROCEEDING RELEASE 34-53624, APRIL 10, 2006; THE SECURITIES AND EXCHANGE COMMISSION COMPLAINT ALLEGES THAT RESPONDENT WILLFULLY VIOLATED SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER BY FAILING TO RETAIN THE SUITABILITY AND ASSET ALLOCATION FORMS COMPLETED BY THE FCSO, ALONG WITH ALL CORRESPONDENCE SENT TO THE FCSO; FROM FEBRUARY 2003 THROUGH JANUARY 2004, WHILE EMPLOYED BY AND |



ASSOCIATED WITH METLIFE, A REGISTERED REPRESENTATIVE OF METLIFE (THE "REGISTERED REPRESENTATIVE") MADE MISREPRESENTATIONS OF MATERIAL FACT TO THE FCSO AND DEFRAUDED THE FCSO WITH RESPECT TO THE INVESTMENT OF APPROXIMATELY \$7.2 MILLION IN SECURITIES. METLIFE FAILED REASONABLY TO SUPERVISE THE REGISTERED REPRESENTATIVE WITH A VIEW TO DETECTING AND/OR PREVENTING THESE FRAUDULENT ACTIONS. METLIFE ALSO FAILED TO KEEP CERTAIN CUSTOMER RECORDS REQUIRED BY SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER.

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 04/10/2006

Docket/Case Number: 3-12257

Principal Product Type: Annuity(ies) - Variable

Other Product Type(s):

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

Other Sanction(s)/Relief Sought: CENSURE, CIVIL PENALTY

Resolution: Order

Resolution Date: 04/10/2006

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 \$250,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: RESPONDENT HAS UNDERTAKEN TO PAY AND HAS PAID \$1,500,000 TO THE FCSO.

Sanction Details: WITHOUT ADMITTING OR DENYING FINDINGS, RESPONDENT CONSENTED TO THE ENTRY OF THIS ORDER; ACCORDINGLY PURSUANT TO SECTIONS 15(B) AND 21(C) OF THE EXCHANGE ACT IS ORDERED THAT: PURSUANT TO SECTION 15(B)(4) OF THE EXCHANGE ACT, RESPONDENT IS CENSURED; PURSUANT TO SECTION 21C OF THE EXCHANGE ACT, RESPONDENT SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY



VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A)(1) OF THE EXCHANGE ACT AND RULE 17A-4 THEREUNDER; AND RESPONDENT SHALL, WITH TEN DAYS OF ENTRY OF THIS ORDER, PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$250,000 TO THE UNITED STATES TREASURY.

Reporting Source: Firm

Current Status: Final

Allegations: FROM FEBRUARY 2003 THROUGH JANUARY 2004, A REGISTERED REPRESENTATIVE OF APPLICANT ALLEGEDLY MADE MISREPRESENTATIONS TO THE FULTON COUNTY SHERIFF'S OFFICE ("FCSO") AND DEFRAUDED THE FCSO WITH RESPECT TO THE INVESTMENT. IT WAS ALLEGED THAT APPLICANT FAILED TO SUPERVISE THE REGISTERED REPRESENTATIVE AND FAILED TO KEEP CERTAIN CUSTOMER RECORDS.

Initiated By: SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 04/01/2004

Docket/Case Number: 3-12257

Principal Product Type: Debt - Corporate

Other Product Type(s): THE PRINCIPAL PRODUCT WAS AN UNAPPROVED INVESTMENT IN PROVIDENT CAPITAL (CORPORATE BOND); THE SECONDARY PRODUCT WAS A VARIABLE ANNUITY.

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

Other Sanction(s)/Relief Sought: CENSURE; CIVIL MONETARY PENALTY

Resolution: Order

Resolution Date: 04/10/2006

Sanctions Ordered: Monetary/Fine \$250,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: IN ADDITION TO UNDERTAKING TO PAY AND PAYING THE FCSO \$1,500,000.00, APPLICANT CONSENTED TO THE ENTRY OF AN ORDER, AGREEING TO BE CENSURED, CEASE AND DESIST FROM ANY FUTURE VIOLATIONS OF THE EXCHANGE ACT, AND PAY A CIVIL MONETARY PENALTY OF \$250,000.00 TO THE UNITED STATES TREASURY.

Firm Statement IN ADDITION TO UNDERTAKING TO PAY AND PAYING THE FCSO



\$1,500,000.00, APPLICANT CONSENTED TO THE ENTRY OF AN ORDER, AGREEING TO BE CENSURED, CEASE AND DESIST FROM ANY FUTURE VIOLATIONS OF THE EXCHANGE ACT, AND PAY A CIVIL MONETARY PENALTY OF \$250,000.00 TO THE UNITED STATES TREASURY.

Disclosure 3 of 11

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|---|---|
| Reporting Source: | Regulator |
| Current Status: | Final |
| Allegations: | ARTICLE V, SECTIONS 2(C) AND 3(B) OF NASD'S BY-LAWS, NASD RULES 2110, 3010 - METROPOLITAN LIFE INSURANCE COMPANY FILED AT LEAST 340 LATE AMENDMENTS TO FORMS U4 AND U5, REPRESENTING APPROXIMATELY 62% OF THE REQUIRED AMENDMENTS RELATING TO REPORTABLE CUSTOMER COMPLAINTS, TERMINATIONS, REGULATORY ACTIONS, AND CRIMINAL DISCLOSURES. THE FIRM'S SUPERVISORY SYSTEM AND PROCEDURES WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH ITS ARTICLE V REPORTING OBLIGATIONS. |
| Initiated By: | NASD |
| Date Initiated: | 11/30/2004 |
| Docket/Case Number: | C11040042 |
| 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: | 11/30/2004 |
| 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 \$375,000.00 |
| Other Sanctions Ordered: | UNDERTAKINGS |

**Sanction Details:**

WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, METROPOLITAN LIFE INSURANCE COMPANY CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, THE FIRM IS CENSURED, FINED \$375,000 WHICH SHALL BE PAID WITHIN 10 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC. PROMPTLY FOLLOWING NOTICE OF ACCEPTANCE OF THIS AWC, THE FIRM'S INTERNAL AUDIT DEPT. OR PERSONNEL NOT DIRECTLY RESPONSIBLE FOR THE FIRM'S ARTICLE V REPORTING OBLIGATIONS AND THEIR IMMEDIATE SUPERVISORS SHALL CONDUCT AN AUDIT FOR THE PERIOD JANUARY 1, 2004 THROUGH SEPTEMBER 30, 2004 TO ASSESS THE EFFECTIVENESS OF ITS SYSTEM AND PROCEDURES FOR ENSURING TIMELY FILING OF FORM U4 AND U5 AMENDMENTS AND SHALL PREPARE A WRITTEN REPORT SUMMARIZING FINDINGS AND RECOMMENDATIONS AND SHALL FOR THE NEXT FOUR CALENDAR QUARTERS BEGINNING FOURTH QUARTER 2004, CONDUCT A SIMILAR AUDIT AND PREPARE A SIMILAR WRITTEN AUDIT REPORT. NO LATER THAN 90 DAYS AFTER NOTICE OF ACCEPTANCE OF THIS AWC, AN OFFICER OF THE FIRM SHALL CERTIFY IN WRITING TO NASD THAT AN AUDIT WAS CONDUCTED AND THE OFFICER HAS REVIEWED THE CURRENT AUDIT REPORT. NO LATER THAN 60 DAYS AFTER THE DATE OF THE REPORT, AN OFFICER SHALL CERTIFY IN WRITING TO NASD THAT THE FIRM HAS IMPLEMENTED, OR HAS BEGUN TO IMPLEMENT, ANY RECOMMENDATIONS WITHIN A SPECIFIED TIME PERIOD. NO LATER THAN 60 DAYS AFTER THE LAST DAY OF THE NEXT FOUR QUARTERS, AN OFFICER SHALL CERTIFY IN WRITING TO NASD THAT AN AUDIT WAS CONDUCTED, THE CURRENT AUDIT REPORT WAS REVIEWED, AND RECOMMENDATIONS IMPLEMENTED, OR BEGUN TO BE IMPLEMENTED. NO LATER THAN SIX MONTHS AFTER NOTICE OF ACCEPTANCE OF THIS AWC, AN OFFICER SHALL CERTIFY IN WRITING TO NASD THAT THE FIRM HAS REVIEWED ITS SYSTEM AND PROCEDURES FOR COMPLYING WITH ITS ARTICLE V REPORTING OBLIGATIONS AND HAS ESTABLISHED A SYSTEM AND PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH REPORTING REQUIREMENTS SET FORTH THEREIN.

Reporting Source: Firm

Current Status: Final

Allegations: IT WAS ALLEGED THAT METLIFE FAILED TO FILE CERTAIN AMENDMENTS TO DISCLOSURE QUESTIONS ON FORM U4 AND FORM U5 IN A TIMELY MANNER.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 06/25/2004

Docket/Case Number: C11040042



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| 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: | METLIFE WAS REQUIRED TO PAY A FINE OF \$375,000 TO THE NASD WITHIN THE TIME PERIOD SPECIFIED IN THE AWC. IN ADDITION, FOR A ONE YEAR PERIOD, METLIFE WILL (1) CONDUCT REQUIRED AUDITS OF SYSTEMS AND PROCEDURES FOR ENSURING THE TIMELY FILING OF AMENDMENTS TO FORM U4 AND FORM U5, (2) PREPARE WRITTEN REPORTS SUMMARIZING THE FINDINGS AND RECOMMENDATIONS, AND (3) NOTIFY THE NASD THAT SUCH AUDITS HAVE BEEN CONDUCTED AND ANY RECOMMENDATIONS IMPLEMENTED. |
| Resolution: | Acceptance, Waiver & Consent(AWC) |
| Resolution Date: | 11/30/2004 |
| Sanctions Ordered: | Censure Monetary/Fine \$375,000.00 |
| Other Sanctions Ordered: | METLIFE WAS REQUIRED TO PAY A FINE OF \$375,000 TO THE NASD WITHIN THE TIME PERIOD SPECIFIED IN THE AWC. IN ADDITION, FOR A ONE YEAR PERIOD, METLIFE WILL (1) CONDUCT REQUIRED AUDITS OF SYSTEMS AND PROCEDURES FOR ENSURING THE TIMELY FILING OF AMENDMENTS TO FORM U4 AND FORM U5, (2) PREPARE WRITTEN REPORTS SUMMARIZING THE FINDINGS AND RECOMMENDATIONS, AND (3) NOTIFY THE NASD THAT SUCH AUDITS HAVE BEEN CONDUCTED AND ANY RECOMMENDATIONS IMPLEMENTED. |
| Sanction Details: | METLIFE PAID A \$375,000 FINE. IN ADDITION, METLIFE MUST UNDERGO INTERNAL AUDITS AND PREPARE REQUIRED REPORTS IN ACCORDANCE WITH THE TERMS OF THE AWC. |
| Firm Statement | METLIFE EXECUTED A LETTER OF ACCEPTANCE, WAIVER, AND CONSENT DATED 11/16/2004, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS CONTAINED THEREIN, IN CONNECTION WITH THE NASD'S INVESTIGATION OF METLIFE'S LATE FILINGS OF CERTAIN AMENDMENTS TO FORM U4 AND FORM U5. THE NASD ACCEPTED THE AWC ON 11/30/2004. |

Disclosure 4 of 11

| | |
|--------------------------|--|
| Reporting Source: | Firm |
| Current Status: | Final |
| Allegations: | OFFERING OR GIVING STUFFED ANIMALS TO CUSTOMERS AND POTENTIAL CUSTOMERS IN ALLEGED VIOLATION OF STATE STATUTE. |



Initiated By: MASSACHUSETTS DIVISION OF INSURANCE

Date Initiated: 05/06/1996

Docket/Case Number: SIU INVESTIGATION NOS. 2228 & 2690 AD

Principal Product Type: Other

Other Product Type(s):

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

Other Sanction(s)/Relief Sought: A \$30,000 ADMINISTRATIVE ASSESSMENT.

Resolution: Settled

Resolution Date: 07/23/1998

Sanctions Ordered: Monetary/Fine \$30,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: METLIFE AGREED TO SETTLE THE INVESTIGATION ON JULY 23, 1998, BY AGREEING TO STOP OFFERING THESE STUFFED ANIMALS AND BY PAYING A \$30,000 ADMINISTRATIVE ASSESSMENT.

Firm Statement THE MASSACHUSETTS INSURANCE DIVISION INVESTIGATED WHETHER THE GIVING OR OFFERING OF SMALL STUFFED ANIMALS TO CUSTOMERS AND POTENTIAL CUSTOMERS VIOLATED THE STATE INSURANCE LAW AGAINST OFFERING OR PAYING VALUABLE CONSIDERATION TO CONSUMERS. METLIFE AGREED TO SETTLE THE INVESTIGATION ON JULY 23, 1998, BY AGREEING TO STOP OFFERING THESE STUFFED ANIMALS AND BY PAYING A \$30,000 ADMINISTRATIVE ASSESSMENT.

Disclosure 5 of 11

Reporting Source: Firm

Current Status: Final

Allegations: ALLEGED SALE OF LIFE INSURANCE PRODUCTS AS A SAVINGS OR RETIREMENT PLAN.

Initiated By: U.S. ATTORNEY'S OFFICE FOR THE MIDDLE DISTRICT OF FLORIDA

Date Initiated: 07/01/1994

Docket/Case Number: N/A



Principal Product Type: Insurance

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 10/29/1998

Sanctions Ordered: Monetary/Fine \$25,000,000.00

Other Sanctions Ordered: REIMBURSEMENT OF INVESTIGATIVE COSTS IN THE AMOUNT OF \$186,173.

Sanction Details: REIMBURSEMENT OF INVESTIGATIVE COSTS IN THE AMOUNT OF \$186,173.

Firm Statement
 DURING THE PERIOD 1994 TO 1998, THE UNITED STATES ATTORNEY'S OFFICE FOR THE MIDDLE DISTRICT OF FLORIDA CONDUCTED AN INVESTIGATION OF CERTAIN LIFE INSURANCE MARKETINGS AND SALES PRACTICES. THE INVESTIGATION FOCUSED ON THE SALE OF LIFE INSURANCE AS A RETIREMENT OR SAVINGS PLAN, PRINCIPALLY BY A SALES OFFICE LOCATED IN TAMPAN, FLORIDA DURING THE PERIOD 1989 THROUGH 1993. IN OCTOBER 1998, METLIFE AND THE U.S. ATTORNEY'S OFFICE ENTERED INTO A CIVIL SETTLEMENT FULLY RESOLVING THE MATTERS RAISED BY THE INVESTIGATION. METLIFE, WHICH MADE NO ADMISSIONS IN THAT SETTLEMENT, AGREED TO PAY A CIVIL MONETARY PENALTY OF \$25 MILION TO THE U.S. AND TO REIMBURSE THE U.S. POSTAL INSPECTION SERVICE \$186,173 FOR THE COSTS OF THE INVESTIGATION.

Disclosure 6 of 11

Reporting Source: Firm

Current Status: Final

Allegations: ALLEGED LIABILITY FOR CONDUCT OF TWO (2) FORMER SALES EMPLOYEES WHO DEFRAUDED CUSTOMERS BY PROMOTING AND SELLING UNAUTHORIZED RISKY INVESTMENTS.

Initiated By: NEW YORK ATTORNEY GENERAL'S OFFICE

Date Initiated: 12/15/1999

Docket/Case Number: N/A

Principal Product Type: No Product

Other Product Type(s):



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| Principal Sanction(s)/Relief Sought: | Restitution |
| Other Sanction(s)/Relief Sought: | |
| Resolution: | Stipulation and Consent |
| Resolution Date: | 05/10/2000 |
| Firm Statement | THE NEW YORK ATTORNEY GENERAL'S OFFICE COMMENCED AN INVESTIGATION CONCERNING THE CONDUCT OF TWO FORMER SALES EMPLOYEES. THE AG'S OFFICE SOUGHT RESTITUTION ON BEHALF OF INDIVIDUALS WHO LOST MONEY AFTER PLACING MONEY IN RISKY UNAUTHORIZED INVESTMENTS PROMOTED BY THE FORMER EMPLOYEES. METLIFE AGREED TO SETTLE THE MATTER BY CREATING A RESTITUTION FUND IN THE AMOUNT OF \$1,250,000, ALL OF WHICH WAS DEVOTED TO RESTITUTION. NO OTHER FINE OR PAYMENT WAS IMPOSED. |

Disclosure 7 of 11

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|---|---|
| Reporting Source: | Firm |
| Current Status: | Final |
| Allegations: | ALLEGED INVOLVEMENT IN MISREPRESENTATION OF SO-CALLED "VANISHING PREMIUM" LIFE INSURANCE POLICIES AND IMPROPER REPLACEMENT OF LIFE INSURANCE. |
| Initiated By: | FLORIDA DEPT. OF INSURANCE/FLORIDA ATTORNEY GENERAL'S OFFICE |
| Date Initiated: | 05/13/1997 |
| Docket/Case Number: | 19220-96-CO |
| Principal Product Type: | Insurance |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Restitution |
| Other Sanction(s)/Relief Sought: | MANDATORY PAYMENT TO COVER COSTS OF INVESTIGATION AND TO FUND CONSUMER OUTREACH. |
| Resolution: | Stipulation and Consent |
| Resolution Date: | 02/02/2000 |
| Sanctions Ordered: | Monetary/Fine \$7,500,000.00 |
| Other Sanctions Ordered: | |



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|--------------------------|--|
| Sanction Details: | MANDATORY PAYMENT TO COVER COSTS OF INVESTIGATION AND TO FUND CONSUMER OUTREACH. |
| Firm Statement | THE FLORIDA DEPT OF INSURANCE AND ATTORNEY GENERAL'S OFFICE JOINTLY CONDUCTED AN INVESTIGATION OF ALLEGED IMPROPER LIFE INSURANCE SALES, FOCUSING ON REPLACEMENT ISSUES AND VANISHING PREMIUMS. METLIFE ENTERED INTO A CONSENT ORDER DATED 2/02/00 RESOLVING ALL ISSUES AND AGREEING TO PAY \$7,500,000.00 TO REIMBURSE FOR COSTS OF THE INVESTIGATION AND FOR "OTHER PUBLIC PURPOSES. |

Disclosure 8 of 11

| | |
|---|---|
| Reporting Source: | Firm |
| Current Status: | Final |
| Allegations: | ALLEGED INVOLVEMENT IN MISREPRESENTATION OF SO-CALLED "VANISHING PREMIUM" LIFE INSURANCE POLICIES AND IMPROPER REPLACEMENT OF LIFE INSURANCE. |
| Initiated By: | MASSACHUSETTS ATTORNEY GENERAL OFFICE |
| Date Initiated: | 12/10/1995 |
| Docket/Case Number: | N/A |
| Principal Product Type: | Insurance |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Restitution |
| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE PAYMENT TO COVER COSTS OF INVESTIGATION AND TO FUND CONSUMER OUTREACH. |
| Resolution: | Other |
| Resolution Date: | 01/11/2000 |
| Sanctions Ordered: | Monetary/Fine \$1,200,000.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | ADMINISTRATIVE PAYMENT TO COVER COSTS OF INVESTIGATION AND TO FUND CONSUMER OUTREACH. |
| Firm Statement | THE MASSACHUSETTS ATTORNEY GENERAL'S OFFICE CONDUCTED AN INVESTIGATION OF ALLEGED IMPROPER LIFE INSURANCE SALES, FOCUSING ON "VANISHING PREMIUM" AND REPLACEMENT ISSUES. ON 1/11/00, METLIFE ENTERED INTO A MEMORANDUM OF UNDERSTANDING |



WITH THE AG'S OFFICE THE COSTS OF THE INVESTIGATION AND TO FUND VARIOUS CONSUMER OUTREACH PROGRAMS. THE MEMORANDUM OF UNDERSTANDING WAS INCORPORATED INTO A CONSENT JUDGEMENT THAT WAS ENTERED ON 6/13/00 BY THE MASS. SUPERIOR COURT FOR COUNTY OF SUFFOLK. SEE RESPONSE TO 11.H.(1)(C).

Disclosure 9 of 11

| | |
|---|---|
| Reporting Source: | Regulator |
| Current Status: | Final |
| Allegations: | ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - RESPONDENT MEMBERS MADE 351 U-5 FILINGS WHICH WERE MORE THAN 30 DAYS AFTER TERMINATION OR WERE INCOMPLETE |
| Initiated By: | NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC. |
| Date Initiated: | 08/04/1994 |
| Docket/Case Number: | C10950049 |
| 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: | 07/20/1995 |
| Sanctions Ordered: | Monetary/Fine \$75,000.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC) NO. C10950049 WAS ACCEPTED: THEREFORE, RESPONDENTS METROPOLITAN LIFE INSURANCE COMPANY AND METLIFE SECURTIES, INC. ARE CENSURED AND FINED \$75,000, JOINTLY AND SEVERALLY, AND, PERFORM THE FOLLOWING UNDERTAKING: A) WITHIN 30 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC, A COPY OF THEIR SUPERVISORY PROCEDURES INDICATING THE NAME OR TITLE OF THE INDIVIDUAL RESPONSIBLE FOR THE ACCURACY AND PROMPT SUBMISSION OF ALL FORM U-5 TRANSMISSIONS WILL BE SUBMITTED TO DISTRICT NO. 10; WITHIN 90 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC, BOTH MEMBER FIRMS WILL HAVE AN AUDIT BY AN INDEPENDENT |



(NON-EMPLOYEE)CONSULTANT NOT UNACCEPTABLE TO THE NASD OF THE ACCURACY OF THE MEMBERS' CURRENT REGISTRATION RECORDS AND A REVIEW INCLUDING BUT NOT LIMITED TO ALL POLICIES AND PROCEDURES INCLUDING SUPERVISORY ASSIGNMENTS RELEVANT TO THE REPORTING OF TERMINATIONS AND COMPLAINT INFORMATION ON FORM U-5 AND WILL PREPARE A REPORT TO SENIOR MANAGEMENT INDICATING ANY DEFICIENCIES WITH ANY RECOMMENDED CORRECTIVE ACTION. C) WITHIN 120 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC, A COPY OF THE ABOVE-REFERENCED AUDIT REPORT WILL BE SUBMITTED TO THE NASD DISTRICT NO. 10 OFFICE WITH DETAILS OF THE CORRECTIVE ACTION TAKEN AS A RESULT OF THE RECOMMENDATIONS IN THE REPORT; AND D). SIX MONTHS AND ONE YEAR AFTER NOTICE OF THIS AWC, EACH FIRM WILL PROVIDE THE NASD WITH A SUMMARY REPORT OUTLINING THE DETAILS OF EVERY LATE OR INCOMPLETE U-5 FILING, IF ANY,

MADE WITHIN THE PRIOR SIX MONTHS WITH AN EXPLANATION OF THE CAUSE OF THE DELAY OR INCOMPLETE REPORT AND THE CORRECTIVE ACTION TAKEN - (ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - RESPONDENT MEMBERS MADE 351 U-5 FILINGS WHICH WERE MORE THAN 30 DAYS AFTER TERMINATION OR WERE INCOMPLETE). **\$75,000.00 J&S PAID ON 8/8/95 INVOICE #95-10-460**

Regulator Statement

[TOP] ON 7/20/95, DISTRICT NO. 10 NOTIFIED RESPONDENTS METROPOLITAN LIFE INSURANCE COMPANY AND METLIFE SECURTIES, INC. THAT THE LETTER OF ACCEPTANCE, WAIVER AND CONSENT (AWC) NO. C10950049 WAS ACCEPTED: THEREFORE, THEY ARE CENSURED AND FINED \$75,000, JOINTLY AND SEVERALLY, AND, PERFORM THE FOLLOWING UNDERTAKING: A) WITHIN 30 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC, A COPY OF THEIR SUPERVISORY PROCEDURES INDICATING THE NAME OR TITLE OF THE INDIVIDUAL RESPONSIBLE FOR THE ACCURACY AND PROMPT SUBMISSION OF ALL FORM U-5 TRANSMISSIONS WILL BE SUBMITTED TO DISTRICT NO. 10; WITHIN 90 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC, BOTH MEMBER FIRMS WILL HAVE AN AUDIT BY AN INDEPENDENT (NON-EMPLOYEE)CONSULTANT NOT UNACCEPTABLE TO THE NASD OF THE ACCURACY OF THE MEMBERS' CURRENT REGISTRATION RECORDS AND A REVIEW INCLUDING BUT NOT LIMITED TO ALL POLICIES AND PROCEDURES INCLUDING SUPERVISORY ASSIGNMENTS RELEVANT TO THE REPORTING OF TERMINATIONS AND COMPLAINT INFORMATION ON FORM U-5 AND WILL PREPARE A REPORT TO SENIOR MANAGEMENT INDICATING ANY DEFICIENCIES WITH ANY RECOMMENDED CORRECTIVE ACTION. C) WITHIN 120 DAYS OF NOTICE OF ACCEPTANCE OF THIS AWC, A COPY OF THE ABOVE-REFERENCED AUDIT REPORT WILL BE SUBMITTED TO THE NASD DISTRICT NO. 10 OFFICE WITH DETAILS OF THE CORRECTIVE ACTION TAKEN AS A RESULT OF THE RECOMMENDATIONS IN THE REPORT; AND D). SIX MONTHS AND ONE YEAR AFTER NOTICE OF THIS AWC, EACH FIRM WILL PROVIDE THE NASD WITH A



SUMMARY REPORT OUTLINING THE DETAILS OF EVERY LATE OR INCOMPLETE U-5 FILING, IF ANY, MADE WITHIN THE PRIOR SIX MONTHS WITH AN EXPLANATION OF THE CAUSE OF THE DELAY OR INCOMPLETE REPORT AND THE CORRECTIVE ACTION TAKEN - (ARTICLE III, SECTION 1 OF THE RULES OF FAIR PRACTICE - RESPONDENT MEMBERS MADE 351 U-5 FILINGS WHICH WERE MORE THAN 30 DAYS AFTER TERMINATION OR WERE INCOMPLETE). **\$75,000.00 J&S PAID ON 8/8/95 INVOICE #95-10-460**

Reporting Source: Firm

Current Status: Final

Allegations: LATE AND INCOMPLETE FILING OF TERMINATION NOTICES FOR REGISTERED REPRESENTATIVES.

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 08/04/1994

Docket/Case Number: AWC C10950049

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: 07/19/1995

Sanctions Ordered: Monetary/Fine \$75,000.00

Other Sanctions Ordered:

Sanction Details: METLIFE AND METLIFE SECURITIES, INC. JOINTLY PAID A \$75,000 FINE AND AGREED TO UNDERGO AN INDEPENDENT AUDIT OF ITS REGISTRATION RECORDS AND A REVIEW OF ITS POLICIES AND PROCEDURES RELATED TO THE REPORTING OF TERMINATIONS OF REGISTERED INDIVIDUALS AND COMPLAINTS DISCLOSED ON TERMINATION NOTICES. METLIFE AND METLIFE SECURITIES, INC. AGREED TO PREPARE A REPORT TO BE DELIVERED TO THE NASD WITHIN 18 MONTHS OF THE SETTLEMENT DETAILING LATE OR INCOMPLETE TERMINATION NOTICES WITHIN THE PRIOR 6 MONTHS AND THE REASONS FOR THE DELAY OR INCOMPLETION AND ANY CORRECTIVE ACTION TAKEN.



Firm Statement METLIFE AND METLIFE SECURITIES, INC. EXECUTED A LETTER OF ACCEPTANCE, WAIVER AND CONSENT, DATED APRIL 26, 1995, WHICH WAS ACCEPTED BY THE NASD ON JULY 19, 1995, WITHOUT ADMITTING OR DENYING THE ALLEGATIONS CONTAINED THEREIN IN CONNECTION WITH THE FILING OF LATE AND INCOMPLETE TERMINATION NOTICES FOR REGISTERED REPRESENTATIVES.

Disclosure 10 of 11

Reporting Source: Firm

Current Status: Final

Allegations: IMPROPER REPLACEMENT OF LIFE INSURANCE AND MISREPRESENTATION OF SO CALLED "VANISHING PREMIUM" LIFE INSURANCE POLICIES.

Initiated By: STATE OF CONNECTICUT INSURANCE DEPT. AND CONN ATTORNEY GENERAL

Date Initiated: 10/20/1998

Docket/Case Number: MC 98-104

Principal Product Type: Insurance

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 10/20/1998

Sanctions Ordered: Monetary/Fine \$800,000.00

Other Sanctions Ordered: METLIFE PAID \$150,000 TO A FUND FOR CONSUMER EDUCATION AND AGREED TO FUND A REMEDIATION PLAN FOR CERTAIN PURCHASERS OF LIFE INSURANCE PRODUCTS.

Sanction Details: PAID \$800,000 FINE, \$150,000 FOR CONSUMER EDUCATION AND \$50,000 FOR REIMBURSEMENT OF COSTS.

Firm Statement CONSENT ORDER ENTERED ON OCTOBER 20, 1998.

Disclosure 11 of 11



Reporting Source: Regulator

Current Status: Final

Allegations: ALLEGES THAT FIRM VIOLATED THE VIRGINIA SECURITIES ACT RULES 303 D.1, 303 D.4., 304 A.2. AND 305 A.3. BY FAILING TO EXERCISE DILIGENT SUPERVISION OVER THE SECURITIES ACTIVITIES OF ITS AGENT, FAILING TO MAINTAIN A CURRENT RECORD OF CUSTOMER INVESTMENT OBJECTIVES AND ALLOWING THE RECOMMENDATION TO A CUSTOMER THE PURCHASE OR SALE OF A SECURITY WITHOUT REASONABLE GROUND TO BELIEVE SUCH RECOMMENDATION TO BE SUITABLE.

Initiated By: VIRGINIA - STATE CORPORATION COMMISSION
DIVISION OF SECURITIES

Date Initiated: 02/12/1993

Docket/Case Number: SEC 930002

URL for Regulatory Action:

Principal Product Type:

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Consent

Resolution Date: 04/21/1993

Sanctions Ordered: Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: ENTERED INTO AN ORDER, WITHOUT ADMITTING OR DENYING ALLEGATIONS, DEFENDANT AGREED TO OFFER RECISSION AND RESTITUTION TO THE VIRGINIA RESIDENT INVOLVED AND REIMBURSEMENT OF THE COSTS OF INVESTIGATION IN THE AMOUNT OF \$750.00.

Regulator Statement CONTACT HAZEL CHEATHAM, SENIOR BROKER-DEALER EXAMINER, 804-371-2685.



Reporting Source: Firm

Current Status: Final

Allegations: IT WAS ALLEGED THAT METLIFE SECURITIES, INC. ("MSI") FAILED TO EXERCISE DILIGENT SUPERVISION, FAILED TO MAINTAIN AND KEEP CERTAIN RECORDS AND RECOMMENDED THE PURCHASE OF A SECURITY WITHOUT REASONABLE BASIS IN CONNECTION WITH THE SALES OF \$85,000.00 WORTH OF HIGH YIELD MUTUAL FUND SHARES TO VIRGINIA RESIDENT.

Initiated By: COMMONWEALTH OF VIRGINIA, EX REL. STATE CORPORATION COMMISSION

Date Initiated: 02/09/1993

Docket/Case Number: CASE NO. SEC 930002

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Restitution

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 04/21/1993

Sanctions Ordered:

Other Sanctions Ordered: PURSUANT TO OFFER OF SETTLEMENT, MSI REFUNDED CONSIDERATIN PAID BY THE VIRGINIA RESIDENT, TOGETHER WITH SIX PERCENT INTEREST, LESS INCOME RECIEVED OR THE SUBSTANTIAL EQUIVALENT IN DAMAGES FOR SHARES ALREADY REDEEMED. (TOTAL REFUND OF \$113,275.00 MINUS THE AMOUNT DESCRIBED ABOVE CAUSED ADDITIONAL PAYMENTS OF \$6540.25 TO INVESTOR). MSI ALSO PAID \$750.00 TO THE STATE FOR COSTS OF THE INVESTIGATION.

Sanction Details: MSI REFUNDED THE VIRGINIA RESIDENT IN FULL ON OR ABOUT FEBRUARY 9, 1993. MSI ALSO REIMBURSED THE STATE FOR THE COSTS OF THE INVESTIGATION.

Firm Statement MSI SETTLED THIS MATTER WITHOUT ADMITTING OR DENYING THE ALLEGATIONS DESCRIBED IN QUESTION 7.



Civil - Final

This type of disclosure event involves (1) an injunction issued by a foreign or domestic court within the last 10 years in connection with investment-related activity, (2) a finding by a court of a violation of any investment-related statute or regulation, or (3) an action dismissed by a court pursuant to a settlement agreement.

Disclosure 1 of 1

| | |
|---|---|
| Reporting Source: | Firm |
| Current Status: | Final |
| Allegations: | ALLEGED INVOLVEMENT IN MISREPRESENTATION OF SO-CALLED "VANISHING PREMIUM" LIFE INSURANCE POLICIES AND IMPROPER REPLACEMENT OF LIFE INSURANCE. |
| Initiated By: | MASSACHUSETTS ATTORNEY GENERAL'S OFFICE |
| Court Details: | MASSACHUSETTS SUPERIOR COURT, SUFFOLK COUNTY, NO. 00-2516-A. |
| Date Court Action Filed: | 06/08/2000 |
| Principal Product Type: | Insurance |
| Other Product Types: | |
| Relief Sought: | Restitution |
| Other Relief Sought: | MONETARY PAYMENT OF \$1,200,000. |
| Resolution: | Consent |
| Resolution Date: | 06/13/2000 |
| Sanctions Ordered or Relief Granted: | Monetary/Fine \$1,200,000.00 |
| Other Sanctions: | |
| Sanction Details: | MONETARY PAYMENT OF \$1,200,000. |
| Firm Statement | THE MASSACHUSETTS ATTORNEY GENERAL'S OFFICE CONDUCTED AN INVESTIGATION OF ALLEGED IMPROPER LIFE INSURANCE SALES, FOCUSING ON "VANISHING PREMIUM" AND REPLACEMENT ISSUES. ON 1/11/00, METLIFE ENTERED INTO A MEMORANDUM OF UNDERSTANDING WITH THE AG'S OFFICE THE COSTS OF THE INVESTIGATION AND TO FUND VARIOUS CONSUMER OUTREACH PROGRAMS. THE MEMORANDUM OF UNDERSTANDING WAS INCORPORATED INTO A CONSENT JUDGEMENT THAT WAS ENTERED ON 6/13/00 BY THE MASS. SUPERIOR COURT FOR COUNTY OF SUFFOLK. SEE RESPONSE TO 11.H.(1)(C). |

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 6

| | |
|-------------------------------------|--|
| Reporting Source: | Regulator |
| Type of Event: | ARBITRATION |
| Allegations: | ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE |
| Arbitration Forum: | NASD |
| Case Initiated: | 10/05/2005 |
| Case Number: | 05-04607 |
| Disputed Product Type: | NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES |
| Sum of All Relief Requested: | \$22,526.00 |
| Disposition: | AWARD AGAINST PARTY |
| Disposition Date: | 02/17/2006 |
| Sum of All Relief Awarded: | \$12,738.51 |

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 6

| | |
|---------------------------|--|
| Reporting Source: | Regulator |
| Type of Event: | ARBITRATION |
| Allegations: | ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-NEGLIGENCE; NO OTHER CONTROVERSY INVOLVED |
| Arbitration Forum: | NASD |
| Case Initiated: | 03/09/2006 |
| Case Number: | 06-00227 |



Disputed Product Type: NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
Sum of All Relief Requested: Unspecified Damages
Disposition: AWARD AGAINST PARTY
Disposition Date: 06/04/2007
Sum of All Relief Awarded: \$105,000.00

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

Disclosure 3 of 6

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-OTHER; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE; ACCOUNT RELATED-NEGLIGENCE; ACCOUNT RELATED-OTHER
Arbitration Forum: FINRA
Case Initiated: 08/08/2014
Case Number: 14-02160
Disputed Product Type: ANNUITIES; VARIABLE ANNUITIES
Sum of All Relief Requested: \$50,000.00
Disposition: AWARD AGAINST PARTY
Disposition Date: 03/23/2015
Sum of All Relief Awarded: \$45,129.33

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

Disclosure 4 of 6

Reporting Source: Regulator
Type of Event: ARBITRATION
Allegations: ACCOUNT ACTIVITY-BRCH OF FIDUCIARY DT; ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-SUITABILITY; NO OTHER



CONTROVERSY INVOLVED

| | |
|-------------------------------------|---|
| Arbitration Forum: | NASD |
| Case Initiated: | 06/04/1991 |
| Case Number: | 91-01457 |
| Disputed Product Type: | NO OTHER TYPE OF SEC INVOLVE; OTHER TYPES OF SECURITIES |
| Sum of All Relief Requested: | \$10,000.00 |
| Disposition: | AWARD AGAINST PARTY |
| Disposition Date: | 04/09/1992 |
| Sum of All Relief Awarded: | \$10,688.00 |

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

Disclosure 5 of 6

| | |
|-------------------------------------|---|
| Reporting Source: | Regulator |
| Type of Event: | ARBITRATION |
| Allegations: | ACCOUNT RELATED-NEGLIGENCE; NO OTHER CONTROVERSY INVOLVED |
| Arbitration Forum: | NASD |
| Case Initiated: | 03/28/1995 |
| Case Number: | 95-00297 |
| Disputed Product Type: | NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES |
| Sum of All Relief Requested: | \$378.00 |
| Disposition: | AWARD AGAINST PARTY |
| Disposition Date: | 01/17/1996 |
| Sum of All Relief Awarded: | \$408.33 |

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

Disclosure 6 of 6

| | |
|--------------------------|-------------|
| Reporting Source: | Regulator |
| Type of Event: | ARBITRATION |



Allegations: ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT RELATED-BREACH OF CONTRACT; ACCOUNT RELATED-FAILURE TO SUPERVISE

Arbitration Forum: NASD

Case Initiated: 11/07/1996

Case Number: 96-04625

Disputed Product Type: ANNUITIES; NO OTHER TYPE OF SEC INVOLVE

Sum of All Relief Requested: \$29,971.21

Disposition: AWARD AGAINST PARTY

Disposition Date: 09/15/1997

Sum of All Relief Awarded: \$2,000.00

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



Disclosure 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 |
|------------------|----------------|--------------|------------------|
| Regulatory Event | 0 | 29 | 0 |

Disclosure Event Details

Regulatory - Final

Disclosure 1 of 29

| | |
|---|---|
| Reporting Source: | Firm |
| Affiliate: | METLIFE INVESTORS USA INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | IT WAS ALLEGED THAT A REGISTERED REPRESENTATIVE AT WORKMAN SECURITIES SOLD METLIFE INVESTOR VARIABLE CONTRACTS, THAT INCLUDED A GMIB RIDER AVAILABLE IN OREGON, TO MINNESOTA CLIENTS. THE APPLICATIONS INDICATED THAT THE CLIENTS WERE IN OREGON AT THE TIME THE APPLICATIONS WERE SIGNED WHEN THE CLIENTS WERE APPARENTLY IN MINNESOTA. THE COMMISSION'S POSITION WAS THAT METLIFE INVESTORS WAS RESPONSIBLE FOR SUPERVISING THE REPRESENTATIVE. |
| Initiated By: | STATE OF MINNESOTA COMMISSIONER OF COMMERCE |
| Date Initiated: | 04/17/2006 |
| Docket/Case Number: | |
| Principal Product Type: | Annuity(ies) - Variable |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Cease and Desist |
| Other Sanction(s)/Relief Sought: | CIVIL PENALTY OF \$250000 |
| Resolution: | Order |
| Resolution Date: | 11/29/2006 |
| Sanctions Ordered: | Monetary/Fine \$250,000.00 Cease and Desist/Injunction |
| Other Sanctions Ordered: | |
| Sanction Details: | THE \$250000 CIVIL PENALTY WAS PAID ON NOVEMBER 29, 2006. |
| Firm Statement | METLIFE INVESTORS USA INSURANCE COMPANY PAID THE CIVIL PENALTY OF \$250,000 AND AGREED TO KEEP THE OREGON CONTRACTS IN FORCE, INCLUDING ANY AND ALL BENEFITS TO MINNESOTA CONTACT OWNERS THAT ARE EQUAL TO OR GREATER THAN THE COMPARABLE MINNESOTA APPROVED CONTRACTS AND WITHOUT ANY GREATER COSTS OR |

EXPENSES, UNLESS SURRENDERED OR TERMINATED BY THE CONTRACT OWNERS. THE \$250,000 CIVIL PENALTY WAS PAID ON NOVEMBER 29, 2006.

Disclosure 2 of 29

| | |
|---|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO MAKE TIMELY SUBMISSION OF COMPLAINT REPORT FOR YEAR 2001. |
| Initiated By: | NEVADA DIVISION OF INSURANCE |
| Date Initiated: | 01/01/2003 |
| Docket/Case Number: | 03.324 |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE FINE |
| Resolution: | Other |
| Resolution Date: | 04/24/2003 |
| Sanctions Ordered: | Monetary/Fine \$1,000.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | ON JULY 17, 2003, THE TRAVELERS INSURANCE COMPANY SIGNED CONSENT TO FINE AND PAID A FINE IN THE AMOUNT OF \$1000.00 |
| Firm Statement | ON JULY 17, 2003, THE TRAVELERS INSURANCE COMPANY SIGNED CONSENT TO FINE AND PAID A FINE IN THE AMOUNT OF \$1000.00 |

Disclosure 3 of 29

| | |
|--------------------------|---------------------------------|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |



| | |
|---|--|
| Allegations: | FAILURE TO PROVIDE RESPONSES ON GENERAL INFORMATION REQUEST TO GEORGIA INSURERS |
| Initiated By: | GEORGIA DEPARTMENT OF INSURANCE |
| Date Initiated: | 03/31/2003 |
| Docket/Case Number: | 2003C-006 |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE FINE |
| Resolution: | Other |
| Resolution Date: | 04/15/2003 |
| Sanctions Ordered: | Monetary/Fine \$1,000.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | ON JUNE 23, 2003, THE TRAVELERS INSURANCE COMPANY SIGNED A STIPULATION AGREEMENT AND PAID A FINE IN THE AMOUNT OF \$1000.00. |
| Firm Statement | ON JUNE 23, 2003, THE TRAVELERS INSURANCE COMPANY SIGNED A STIPULATION AGREEMENT AND PAID A FINE IN THE AMOUNT OF \$1000.00. |

Disclosure 4 of 29

| | |
|--------------------------------|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO ESTABLISH PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH CONNECTICUT MANDATES. |
| Initiated By: | STATE OF CONNECTICUT INSURANCE DEPARTMENT |
| Date Initiated: | 01/01/1998 |
| Docket/Case Number: | MC 01-38 |
| Principal Product Type: | No Product |
| Other Product Type(s): | |



Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: MARKET CONDUCT EXAMINATION FINE

Resolution: Other

Resolution Date: 06/20/2001

Sanctions Ordered: Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 5 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: FAILURE TO ESTABLISH PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH MARYLAND MANDATES.

Initiated By: MARYLAND INSURANCE ADMINISTRATOR

Date Initiated: 10/20/1999

Docket/Case Number: MIA-1237-11/99

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: MARKET CONDUCT EXAMINATION FINE

Resolution: Other

Resolution Date: 11/12/1999

Sanctions Ordered: Monetary/Fine \$15,200.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID.

NO PORTION OF THE FINE WAS WAIVED.

Disclosure 6 of 29

| | |
|---|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO ESTABLISH PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH FLORIDA MANDATES. |
| Initiated By: | FLORIDA DEPARTMENT OF INSURANCE |
| Date Initiated: | 06/16/1997 |
| Docket/Case Number: | 17935-96-C |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | MARKET CONDUCT EXAMINATION FINE |
| Resolution: | Other |
| Resolution Date: | 10/14/1997 |
| Sanctions Ordered: | Monetary/Fine \$1,000.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED. |

Disclosure 7 of 29

| | |
|--------------------------|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO ESTABLISH PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH CONNECTICUT MANDATES. |
| Initiated By: | STATE OF CONNECTICUT INSURANCE DEPARTMENT |



Date Initiated: 01/03/1996
Docket/Case Number: 96-37
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Other
Other Sanction(s)/Relief Sought: MARKET CONDUCT EXAMINATION FINE
Resolution: Other
Resolution Date: 06/02/1996
Sanctions Ordered: Monetary/Fine \$54,000.00
Other Sanctions Ordered:
Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 8 of 29

Reporting Source: Firm
Affiliate: THE TRAVELERS INSURANCE COMPANY
Current Status: Final
Allegations: FAILURE TO ESTABLISH PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH NEW YORK MANDATES.
Initiated By: NEW YORK INSURANCE DEPARTMENT
Date Initiated: 10/16/1995
Docket/Case Number:
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Other
Other Sanction(s)/Relief Sought: MARKET CONDUCT EXAMINATION FINE
Resolution: Other



Resolution Date: 11/16/1995

Sanctions Ordered: Monetary/Fine \$60,000.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 9 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: FAILURE TO ESTABLISH PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH FLORIDA MANDATE.

Initiated By: FLORIDA DEPARTMENT OF INSURANCE

Date Initiated: 07/29/1993

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: MARKET CONDUCT EXAMINATION FINE

Resolution: Other

Resolution Date: 09/09/1993

Sanctions Ordered: Monetary/Fine \$12,500.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 10 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY



Current Status: Final

Allegations: ACCEPTING SIXTEEN APPLICATIONS FOR LIFE INSURANCE, WHICH REPLACED EXISTING LIFE INSURANCE AND FAILING TO PROVIDE NOTICES TO THE EXISTING COMPANIES

Initiated By: STATE OF NEBRASKA DEPARTMENT OF INSURANCE

Date Initiated: 03/23/1995

Docket/Case Number: CAUSE NO. C-891

Principal Product Type: Insurance

Other Product Type(s): LIFE INSURANCE

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ADMINISTRATIVE FINE

Resolution: Other

Resolution Date: 04/25/1995

Sanctions Ordered: Monetary/Fine \$2,000.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 11 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: PREMIUMS CALCULATED INCONSISTENTLY WITH SMALL EMPLOYER REFORM LEGISLATION AND USING AN UNFILED APPLICATION

Initiated By: STATE OF KANSAS INSURANCE DEPARTMENT

Date Initiated: 04/30/1994

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):



Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FORFEITURE

Resolution: Other

Resolution Date: 09/22/1994

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: AGREEMENT, VOLUNTARY FORFEITURE OF \$5000.00

Disclosure 12 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: INADVERTENT MISUSE OF TERM "MEDICARE SUPPLEMENT" IN A SALES BROCHURE.

Initiated By: TEXAS DEPARTMENT OF INSURANCE

Date Initiated: 09/29/1993

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ADMINISTRATIVE PENALTY

Resolution: Other

Resolution Date: 01/06/1994

Sanctions Ordered: Monetary/Fine \$10,000.00

Other Sanctions Ordered: SIGNED CONSENT ORDER AND PAYMENT OF ADMINISTRATIVE PENALTY

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.



Disclosure 13 of 29

| | |
|---|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO RESPOND TO INSURANCE DEPARTMENT INQUIRY ON A TIMELY BASIS. |
| Initiated By: | TEXAS DEPARTMENT OF INSURANCE |
| Date Initiated: | 05/11/1993 |
| Docket/Case Number: | |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE PENALTY |
| Resolution: | Other |
| Resolution Date: | 09/15/1993 |
| Sanctions Ordered: | Monetary/Fine \$2,000.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED. |

Disclosure 14 of 29

| | |
|--------------------------|--|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | NON-COMPLIANCE WITH INSURANCE DEPARTMENT DIRECTIVE IN CONNECTION WITH A CONSUMER COMPLAINT |
| Initiated By: | LOUISIANA INSURANCE DEPARTMENT |
| Date Initiated: | 01/05/1993 |

Docket/Case Number:**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Other**Other Sanction(s)/Relief Sought:** ADMINISTRATIVE FINE**Resolution:** Other**Resolution Date:** 05/13/1993**Sanctions Ordered:** Monetary/Fine \$250.00**Other Sanctions Ordered:****Sanction Details:** A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.**Disclosure 15 of 29****Reporting Source:** Firm**Affiliate:** THE TRAVELERS INSURANCE COMPANY**Current Status:** Final**Allegations:** FAILURE TO NOTIFY THE INSURANCE DEPARTMENT OF AGENT APPOINTMENT IN A TIMELY MANNER.**Initiated By:** KANSAS DEPARTMENT OF INSURANCE**Date Initiated:** 12/05/1994**Docket/Case Number:****Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Other**Other Sanction(s)/Relief Sought:** ADMINISTRATIVE PENALTY**Resolution:** Other**Resolution Date:** 12/22/1994



Sanctions Ordered: Monetary/Fine \$1,500.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 16 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: FAILURE TO RESPOND TO DIVISION OF INSURANCE REQUESTS FOR INFORMATION ON A TIMELY BASIS.

Initiated By: SOUTH DAKOTA DEPARTMENT OF COMMERCE AND REGULATION

Date Initiated: 09/06/2002

Docket/Case Number: 02-6122

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FINE

Resolution: Other

Resolution Date: 09/12/2002

Sanctions Ordered: Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 17 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final



Allegations: FAILURE TO FILE LONG TERM CARE ADVERTISEMENTS PRIOR TO DISTRIBUTION

Initiated By: STATE OF FLORIDA DEPARTMENT OF INSURANCE

Date Initiated: 08/17/1995

Docket/Case Number: 08122-94-C-EMM

Principal Product Type: Insurance

Other Product Type(s): LONG TERM CARE

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ADMINISTRATIVE FINE

Resolution: Other

Resolution Date: 09/05/1995

Sanctions Ordered: Monetary/Fine \$16,000.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 18 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: PAYMENTS OF COMMISSIONS TO AN UNLICENSED AGENCY

Initiated By: MASSACHUSETTS DIVISION OF INSURANCE

Date Initiated: 01/22/1996

Docket/Case Number:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other



Other Sanction(s)/Relief Sought: FINE

Resolution: Other

Resolution Date: 02/22/1996

Sanctions Ordered: Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 19 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: FAILURE TO PROMPTLY REPLY AND PROVIDE THE INFORMATION REQUESTED BY THE COMMISSIONER.

Initiated By: OFFICE OF THE COMMISSIONER OF INSURANCE, STATE OF WISCONSIN

Date Initiated: 06/01/1998

Docket/Case Number: 98-C25487

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ADMINISTRATIVE FINE

Resolution: Other

Resolution Date: 06/16/1998

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.



Disclosure 20 of 29

| | |
|---|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | PROPERTY AND CASUALTY ANNUAL FINANCIAL STATEMENT WAS NOT FILED ON A TIMELY BASIS. |
| Initiated By: | STATE OF CALIFORNIA, DEPARTMENT OF INSURANCE |
| Date Initiated: | 06/15/1998 |
| Docket/Case Number: | |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | LATE FILING FEE |
| Resolution: | Other |
| Resolution Date: | 07/16/1998 |
| Sanctions Ordered: | Monetary/Fine \$472.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED. |

Disclosure 21 of 29

| | |
|----------------------------|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO SUBMIT ANNUAL RATE FILINGS FOR YEARS 1995 AND 1996 |
| Initiated By: | STATE OF FLORIDA DEPARTMENT OF INSURANCE |
| Date Initiated: | 12/16/1999 |
| Docket/Case Number: | CASE NUMBER 27479-99-C |



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|---|---|
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE FINE |
| Resolution: | Other |
| Resolution Date: | 11/10/1999 |
| Sanctions Ordered: | Monetary/Fine \$2,750.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED. |

Disclosure 22 of 29

| | |
|---|---|
| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | FAILURE TO FILE ANNUAL COMPLAINT REPORT WITH THE DIVISION OF INSURANCE |
| Initiated By: | STATE OF NEVADA, DEPARTMENT OF BUSINESS AND INDUSTRY, DIVISION OF INSURANCE |
| Date Initiated: | 06/01/1999 |
| Docket/Case Number: | CAUSE NUMBER 99.717 |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE FINE |
| Resolution: | Other |
| Resolution Date: | 07/08/1999 |
| Sanctions Ordered: | Monetary/Fine \$500.00 |

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 23 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: FAILURE TO PROMPTLY REPLY IN WRITING AND TO PROVIDE THE INFORMATION REQUESTED IN INQUIRIES MADE BY THE COMMISSIONER

Initiated By: OFFICE OF THE COMMISSIONER OF INSURANCE, STATE OF WISCONSIN

Date Initiated: 04/24/2000

Docket/Case Number: 00-C26583

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ADMINISTRATIVE FINE

Resolution: Other

Resolution Date: 05/18/2000

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Disclosure 24 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: ALLOWED SOLICITATION OF INSURANCE AND ACCEPTED APPLICATIONS



PRIOR TO PROPERLY LISTING THE INDIVIDUAL IN QUESTION.

Initiated By: OFFICE OF THE COMMISSIONER OF INSURANCE, STATE OF WISCONSIN

Date Initiated: 06/26/2000

Docket/Case Number: 00-C26631

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: FORFEITURE

Resolution: Other

Resolution Date: 07/19/2000

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED.

Firm Statement PAID FINE PURSUANT TO ORDER OF FORFEITURE.

Disclosure 25 of 29

Reporting Source: Firm

Affiliate: THE TRAVELERS INSURANCE COMPANY

Current Status: Final

Allegations: FAILURE TO COMPLETE THE UTAH INSURANCE DEPARTMENT ACCIDENT AND HEALTH SURVEY ON A TIMELY BASIS.

Initiated By: STATE OF UTAH DEPARTMENT OF INSURANCE

Date Initiated: 11/20/2001

Docket/Case Number: 2001-215-HL

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other



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| Other Sanction(s)/Relief Sought: | ADMINISTRATIVE FINE |
| Resolution: | Other |
| Resolution Date: | 12/07/2001 |
| Sanctions Ordered: | Monetary/Fine \$500.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | A FINE WAS IMPOSED AGAINST THE CONTROL AFFILIATE AND WAS PAID. NO PORTION OF THE FINE WAS WAIVED. |

Disclosure 26 of 29

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| Reporting Source: | Firm |
| Affiliate: | THE TRAVELERS INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | THE COMPANY ALLEGEDLY OMITTED TO STATE MATERIAL FACTS IN ITS FINANCIAL STATEMENTS. |
| Initiated By: | SEC |
| Date Initiated: | 05/03/1994 |
| Docket/Case Number: | ADMIN PROC. FILE NO. 3-8355 |
| Principal Product Type: | No Product |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Other |
| Other Sanction(s)/Relief Sought: | CONSENT ORDER |
| Resolution: | Consent |
| Resolution Date: | 05/03/1994 |
| Sanctions Ordered: | Cease and Desist/Injunction |
| Other Sanctions Ordered: | |
| Sanction Details: | RESTATEMENT OF FINANCIAL STATEMENTS. |
| Firm Statement | MATTER WAS RESOLVED BY CONSENT ORDER 5/3/1994. |

Disclosure 27 of 29

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|---|--|
| Reporting Source: | Firm |
| Affiliate: | GENERAL AMERICAN LIFE INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | IT WAS ALLEGED THAT GENERAL AMERICAN LIFE INSURANCE COMPANY FAILED TO SUBMIT ADVERTISING MATERIALS USED TO MARKET VARIABLE LIFE PRODUCTS TO THE ADMINISTRATION FOR APPROVAL. |
| Initiated By: | MARYLAND INSURANCE ADMINISTRATION |
| Date Initiated: | 02/08/2000 |
| Docket/Case Number: | |
| Principal Product Type: | Insurance |
| Other Product Type(s): | |
| Principal Sanction(s)/Relief Sought: | Civil and Administrative Penalt(ies) /Fine(s) |
| Other Sanction(s)/Relief Sought: | |
| Resolution: | Order |
| Resolution Date: | 02/08/2000 |
| Sanctions Ordered: | Monetary/Fine \$2,500.00 |
| Other Sanctions Ordered: | |
| Sanction Details: | ON FEBRUARY 8, 2000 GENERAL AMERICAN LIFE INSURANCE COMPANY ENTERED INTO A CONSENT ORDER WITH THE MARYLAND INSURANCE ADMINISTRATION UNDER WHICH THE COMPANY PAID AN ADMINISTRATIVE PENALTY OF \$2500.00. THE CONSENT ORDER AROSE FROM A TARGETED MARKET CONDUCT EXAMINATION. |

Disclosure 28 of 29

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|--------------------------|---|
| Reporting Source: | Firm |
| Affiliate: | GENERAL AMERICAN LIFE INSURANCE COMPANY |
| Current Status: | Final |
| Allegations: | IT WAS ALLEGED THAT GENERAL AMERICAN LIFE INSURANCE COMPANY VIOLATED CONNECTICUT INSURANCE LAWS PERTAINING TO AGENT |



LICENSING, AND ADVERTISING.

Initiated By: CONNECTICUT DEPT. OF INSURANCE

Date Initiated: 10/28/1999

Docket/Case Number:

Principal Product Type: Insurance

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 10/28/1999

Sanctions Ordered: Monetary/Fine \$14,000.00

Other Sanctions Ordered:

Sanction Details: ON OCTOBER 28, 1999, GENERAL AMERICAN LIFE INSURANCE COMPANY ENTERED INTO A STIPULATION AND FINAL ORDER WITH THE CONNECTICUT DEPARTMENT OF INSURANCE UNDER WHICH THE COMPANY PAID AN ADMINISTRATIVE FINE OF \$14,000 IN CONNECTION WITH A MARKET CONDUCT EXAMINATION CONDUCTED BY THE DEPT.

Disclosure 29 of 29

Reporting Source: Firm

Affiliate: GENERAL AMERICAN LIFE INSURANCE COMPANY

Current Status: Final

Allegations: IT WAS ALLEGED THAT GENERAL AMERICAN LIFE INSURANCE COMPANY VIOLATED OKLAHOMA INSURANCELAWS RELATING TO AGENT LICENSING, ADVERTISING AND CLAIM PROCESSING.

Initiated By: OKLAHOMA DEPT. OF INSURANCE

Date Initiated: 08/01/1999

Docket/Case Number:

Principal Product Type: Insurance

Other Product Type(s):



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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 08/01/1999

Sanctions Ordered: Monetary/Fine \$6,650.00

Other Sanctions Ordered:

Sanction Details: IN AUGUST 1999, GENERAL AMERICAN LIFE INSURANCE COMPANY PAID A CIVIL PENALTY IN THE AMOUNT OF \$6650.00 TO THE OKLAHOMA DEPT. OF INSURANCE IN CONNECTION WITH A MARKET CONDUCT EXAMINATION CONDUCTED BY THE DEPT.

End of Report



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