

and the advertisement did not include the Respondent's license number or the identity of the insurer(s) and policy forms that will be offered to the consumer.

CONCLUSIONS OF LAW

From the Findings of Fact contained herein, the Commissioner concludes as follows:

5. The Commissioner has jurisdiction over the parties and the subject matter pursuant to Arkansas Code Annotated §§ 23-61-103 and 23-64-512(e).

6. It is unlawful for an insurance producer to pay or give or offer to pay or give, directly or indirectly, as an inducement to insure, any rebate, discount, abatement, credit, reduction of the premium, or any valuable consideration or inducement whatever not specified in the policy except to the extent provided for in an applicable filing with the Insurance Commissioner as provided by law. Ark. Code Ann. § 23-66-308(a).

7. A "rebate" means the act of knowingly paying, allowing, or giving or offering to pay, allow, or give, directly or indirectly, as inducement to the insurance contract any valuable consideration or inducement whatever not specified in the contract. Ark. Code Ann. § 23-66-208(10). The giving of a gift in an amount in excess of \$25.00 is considered a violation of Arkansas Code Annotated §§ 23-66-208(10) and 23-66-308(a). *See* Directive No. 2A-2011.

8. All advertisements by a life insurance producer must include certain information, including information identifying the advertiser as a licensed insurance producer, the producer license number, and the identity of the insurer(s) and policy form(s). AID Rules 17 and 99; *see also* Directive 2-2008.

9. It is an unfair and deceptive act or practice in the business of insurance within the meaning of Arkansas Code Annotated § 23-66-206(6) for an insurance producer to use a senior-specific certification or professional designation that indicates or implies in such a way as to mislead a purchaser or prospective purchaser that the insurance producer has special certification

or training in advising or servicing seniors in connection with the solicitation, sale or purchase of a life insurance or annuity product or in the provision of advice as to the value of or the advisability of purchasing or selling a life insurance or annuity product, either directly or indirectly through publications or writings, or by issuing or promulgating analyses or reports related to a life insurance or annuity product. AID Rule 96, § 5.

10. The prohibited use of senior-specific certifications or professional designations includes, but is not limited to, the following:

(a) Use of a certification or professional designation by an insurance producer who has not actually earned or is otherwise ineligible to use such certification or designation;

(b) Use of a nonexistent or self-conferred certification or professional designation;

(c) Use of a certification or professional designation that indicates or implies a level of occupational qualifications obtained through education, training or experience that the insurance producer using the certification or designation does not have; and

(d) Use of a certification or professional designation that was obtained from a certifying or designating organization that:

(i) Is primarily engaged in the business of instruction in sales or marketing;

(ii) Does not have reasonable standards or procedures for assuring the competency of its certificants or designees;

(iii) Does not have reasonable standards or procedures for monitoring and disciplining its certificants or designees for improper or unethical conduct; or

- (iv) Does not have reasonable continuing education requirements for its certificants or designees in order to maintain the certificate or designation.

AID Rule 96, § 5.

11. A licensed producer must file with the Department any name under which he or she will conduct business and any change in or discontinuance of the name. Ark. Code Ann. § 23-64-210(d).

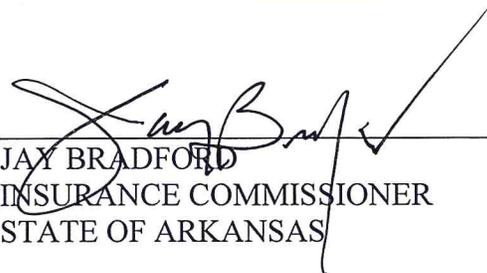
12. Respondent is a licensed insurance producer, and all advertisements disseminated by him must comply with Arkansas law. Respondent's advertisement did not contain the disclosures and information required by Rules 17 and 99, and Respondent offered a gift to the consumer in excess of \$25.00, which is an unlawful rebate. Respondent is also conducting business in the name of an entity that is not licensed with the Department or listed as a "d/b/a" under Respondent's license, in violation of Arkansas Code Annotated § 23-64-210(d), and the entity claims to be a retirement specialist, which is a violation of Rule 96.

13. Respondent is in violation of a number of Arkansas laws, and it is unlawful for him to continue to disseminate the advertisement at issue or any advertisement that violates Arkansas law.

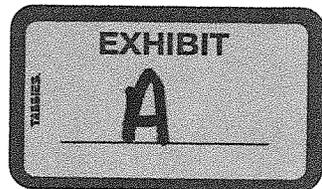
IT IS THEREFORE ORDER AS FOLLOWS:

Respondent is ordered to cease and desist using advertisements of any kind that violate Arkansas law.

IT IS SO ORDERED THIS 30th day of October, 2012.



JAY BRADFORD
INSURANCE COMMISSIONER
STATE OF ARKANSAS



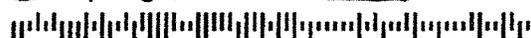
25255 Highway 5
Suite J
Lonsdale, AR 72087

A Special Invitation for...

PRSR STD
U.S. POSTAGE
PAID
MAILED FROM 33634
PERMIT NO. 2401



*A Complimentary \$100 Gift Card and Fine Dining Experience
at Sonny Williams' Steak Room or Back Porch Grill / Martinis On The Bay*



This is an opportunity to privately discuss important financial issues that may affect you and your family today and for years to come. **This is not a seminar event.** This exclusive invitation entitles you to a unique consultation and portfolio analysis, completely free of charge. After your consultation and portfolio analysis, as a **special thank you** for meeting with us, **you will enjoy a fine-dining experience at one of the restaurants below.** Because my calendar fills up quickly, please call (800) 390-7319 today and give RSVP code #313738.

RETIREMENT RESCUE: Are You Missing Information That Could Be Costing You Money Now?

Help cut your future taxes, increase your income, and improve your retirement now just like many other informed retirees who are finding new ways to take back control, enjoy their lives and redirect newly found money to vacations, eating out, grandkids, medical expenses, charity, or whatever you desire.

We will discuss...

- The **3 biggest misconceptions** that your CPA, attorney and financial advisor may be missing that might be **costing you thousands of dollars per year!!!** (*Are your advisors in the dark on this?*)
- If you have mutual funds you may be affected by **phantom income taxes**. *Stop this taxation now!*
- If the **tax return you filed contains one of these 3 items...** you will most likely pay more than your necessary share of taxes. *Stop this and **save taxes now!***
- How to **eliminate capital gains taxes** on the sale of highly appreciated assets. *Learn now before the tax rate goes higher!*
- What **today's smartest investors** are doing to uncover hidden tax and investment risks to **avoid nightmares** in the future!
- A simple technique, if you own any annuity, that can **save you and your heirs thousands in taxes**. *One simple question for you and your accountant will show you how!*
- **3 important things your trust or will doesn't cover** that could cost you and your heirs dearly!
- How a **simple beneficiary mistake** on any of your retirement accounts **could cost you or your heirs thousands of dollars!** *Are you making this mistake?*
- How to **protect your IRAs** from becoming IOUs to the IRS!
- How the **new health insurance rules** will affect your future and how you might be able to **find the money** to pay for part or all of the costs of your future health care needs.
- How to potentially **create an income for the rest of your life**. Lock in an above average income stream for life!
- How much purchasing power do you stand to lose in the next 5, 10 or 15 years?

If you would like to potentially **cut your taxes, lower your market risk, increase your income and much more**, then join us for this exclusive private meeting to learn how to make your retirement more comfortable and **take back control!**

***Receive a Valuable Second Opinion
On What You're Doing Now To Secure Your Lifestyle!***

Also, call today and schedule an appointment to receive a \$100 gift card and enjoy lunch or dinner at one of

On What You're Doing Now To Secure Your Lifestyle!

Allen. call today and schedule an appointment to receive a \$100 gift card, and enjoy lunch or dinner on us at one of the restaurants listed below.

There is absolutely no cost or obligation for you to participate, you'll learn valuable information and techniques that can be implemented to improve your financial position.



RSVP Number:
(800) 390-7319
Your Personal RSVP
Code: 313738



25255 Highway 5 • Suite J • Lonsdale, AR 72087
(Eastgate Hot Springs Village)

Appointments are limited!
So please call today to schedule your complimentary consultation.

Gift card offer limited to one per household. Gift card will be received after consultation and portfolio analysis is completed.

Investment Advisory Services offered through Global Financial Private Capital, LLC, an SEC Registered Investment Advisor. Insurance Product guarantees are subject to the financial strength of the issuing company, and are not guaranteed by any bank or FDIC. Marriott Wealth Advisors, Inc. reserves the right to withdraw this invitation at any time at their discretion.

313738 000203

© 2012 RME, LLC.

FS-FC-011



Joseph W. Marriott



Marriott Wealth Advisors, Inc.

ARKANSAS' RETIREMENT SPECIALISTS

Your Host

Joseph W. Marriott: Joe has 21 years of industry experience in portfolio management, retirement income planning and risk management. He was a Senior Vice President - Complex Manager for two of Wall Street's biggest firms and received his MBA from the University of Iowa. Joe is an advocate for the homeless and currently serves on an executive committee for a homeless organization in Little Rock. Joe and his wife, Diana, have six children and one granddaughter.

Investment Advisory Services offered through Global Financial Private Capital a SEC Registered Investment Advisor. Global Financial Private Capital LLC is not affiliated with Marriott Wealth Advisors, Inc. Insurance Product guarantees are subject to the financial strength of the issuing company, and are not guaranteed by any bank or FDIC.