

**STATE OF NORTH DAKOTA**  
**SECURITIES DEPARTMENT**

In the Matter of Hartford Equity Sales )  
Company Inc. and Craig H. Miller, )  
 )  
 ) **CONSENT ORDER**  
 )  
 Respondents. )

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The North Dakota Securities Commissioner has advised the Respondents, Hartford Equity Sales Company Inc. and Craig H. Miller, that the Commissioner is prepared to commence formal action pursuant to Chapter 10-04 of the North Dakota Century Code and has determined as follows:

1. Respondent, Hartford Equity Sales Company Inc., CRD #6604, (Hartford) is a broker-dealer headquartered in Simsbury, Connecticut. Respondent is, and for all times relevant to this matter has been, registered as a broker-dealer with the North Dakota Securities Department, selling variable insurance products.
2. Respondent, Craig H. Miller, CRD #2232520, (Miller) is a Nebraska resident and was a registered securities agent of MetLife Investors Distribution Company in North Dakota from December 11, 2004, through October 29, 2009. Miller began working as an agent with Hartford Equity Sales Company Inc. on November 15, 2009, but was not approved for registration as a securities agent with Hartford in North Dakota until January 28, 2010.
3. Between December 10, 2009, and January 6, 2010, Respondent Hartford, through Respondent Miller, participated in the offer and sale of a Hartford variable life

insurance policy to two North Dakota residents, while Miller was not registered as an agent with the North Dakota Securities Department. Such conduct was a violation of N.D.C.C. § 10-04-10(2).

4. Respondent Hartford failed to supervise Respondent Miller with respect to these transactions in that it allowed him to do business in a state in which he was not properly registered. Pursuant to N.D.C.C. § 10-04-11(1)(m), a broker-dealer is required to properly supervise its agents.

5. Pursuant to N.D.C.C. § 10-04-16, when it shall appear to the Commissioner that any person has engaged in, or is engaging in, or is about to engage in any act or practice which is prohibited by Chapter 10-04 of the North Dakota Century Code, the Securities Commissioner may issue any order and assess civil penalties in an amount not to exceed \$10,000 for each violation. The violations described above are sufficient grounds for the Commissioner to assess civil penalties against the Respondents pursuant to N.D.C.C. § 10-04-16(1).

6. Respondents acknowledge their rights to a hearing on this matter and waive these rights to a hearing and to present arguments to the Commissioner.

7. Respondents agree to resolve this matter with the Commissioner by this Consent Order.

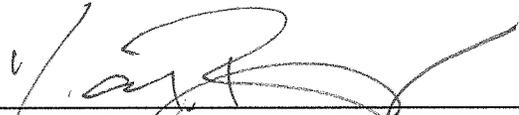
8. The following Order is necessary and appropriate in the public interest for the protection of investors.

**NOW, THEREFORE, IT IS ORDERED, that:**

1. Respondent, Hartford Equity Sales Company Inc., shall pay a civil penalty of \$2,000, made payable to the North Dakota Securities Department, pursuant to N.D.C.C. §10-04-16(1).
2. Respondent, Craig H. Miller, shall pay a civil penalty of \$1,000, made payable to the North Dakota Securities Department, pursuant to N.D.C.C. §10-04-16(1).
3. This Order shall be effective upon signature of the Commissioner.

IN TESTIMONY WHEREOF, witness my hand and seal this 1<sup>st</sup> day of March, 2012.



  
\_\_\_\_\_  
Karen J. Tyler, Securities Commissioner  
North Dakota Securities Department  
600 East Boulevard Ave.  
State Capitol – Fifth Floor  
Bismarck, ND 58505-0510  
(701) 328-2910

STATE OF NORTH DAKOTA

SECURITIES DEPARTMENT

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 )  
 )  
 Respondents. )

CONSENT TO ENTRY  
OF ORDER

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Based on mutual concessions and a willingness to resolve all matters discussed in the foregoing Consent Order, each of the undersigned persons, on behalf of the Respondents, state that:

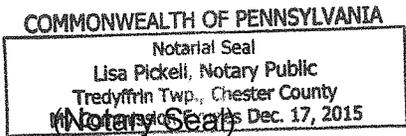
1. He or she has read the foregoing Consent Order, and knows and fully understands its contents and effects.
2. The Respondents have been advised of their rights to a hearing with regard to this matter, and have specifically waived their rights to a hearing.
3. The foregoing Consent Order constitutes the entire settlement agreement between the Respondents and the Securities Commissioner, there being no other promises or agreements, either expressed or implied.
4. The Respondents admit the accuracy of the factual determinations of the Commissioner, as set forth in the foregoing Consent Order, and they are specifically precluded from denying those determinations in any forum, public or otherwise.
5. The Respondents consent to entry of the foregoing Consent Order by the Securities Commissioner, and do so willingly for the purpose of resolving the issues described in the foregoing Consent Order.

Dated this 27<sup>th</sup> day of February, 2012.

HARTFORD EQUITY SALES COMPANY INC.

By: *Chris Conner*  
Its: CEO

Subscribed and Sworn before me this 27<sup>th</sup> day of February, 2012.



*Lisa Pickell*

Notary Public  
State: PA County: Chester  
My Commission Expires: Dec. 17, 2015

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

\_\_\_\_\_  
Craig H. Miller

Subscribed and Sworn before me this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

(Notary Seal)

\_\_\_\_\_  
Notary Public  
State: \_\_\_\_\_ County: \_\_\_\_\_  
My Commission Expires: \_\_\_\_\_

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

HARTFORD EQUITY SALES COMPANY INC.

By: \_\_\_\_\_

Its: \_\_\_\_\_

Subscribed and Sworn before me this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

(Notary Seal)

\_\_\_\_\_  
Notary Public

State: \_\_\_\_\_ County: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

Dated this 29<sup>th</sup> day of Feb., 2012.

*Craig H. Miller*  
\_\_\_\_\_  
Craig H. Miller

Subscribed and Sworn before me this 29<sup>th</sup> day of Feb., 2012.

*Angela Archer*  
\_\_\_\_\_  
Angela Archer

Notary Public

State: \_\_\_\_\_ County: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

