



Viceroy Research, LLC  
1901 Orange Street  
Wilmington DE 19801

February 14, 2025

**Insurance Commissioners of the United States of America**

As listed

By email:

- |  |  |  |
|--|--|--|
| <a href="mailto:insdept@insurance.alabama.gov">insdept@insurance.alabama.gov</a>           | <a href="mailto:insurance.mia@maryland.gov">insurance.mia@maryland.gov</a>                     | <a href="mailto:donna.dorr@oid.ok.gov">donna.dorr@oid.ok.gov</a>                           |
| <a href="mailto:insurance@alaska.gov">insurance@alaska.gov</a>                             | <a href="mailto:CSSComplaints@mass.gov">CSSComplaints@mass.gov</a>                             | <a href="mailto:DFR.InsuranceHelp@dcbs.oregon.gov">DFR.InsuranceHelp@dcbs.oregon.gov</a>   |
| <a href="mailto:insurance.consumers@difi.az.gov">insurance.consumers@difi.az.gov</a>       | <a href="mailto:DIFSInfo@michigan.gov">DIFSInfo@michigan.gov</a>                               | <a href="mailto:wrohaly@pa.gov">wrohaly@pa.gov</a>   |
| <a href="mailto:insurance.consumers@arkansas.gov">insurance.consumers@arkansas.gov</a>     | <a href="mailto:consumer.protection@state.mn.us">consumer.protection@state.mn.us</a>           | <a href="mailto:dbr.insurance@dbr.ri.gov">dbr.insurance@dbr.ri.gov</a>                     |
| <a href="mailto:lewis.deslauriers@insurance.ca.gov">lewis.deslauriers@insurance.ca.gov</a> | <a href="mailto:john.hornback@mid.ms.gov">john.hornback@mid.ms.gov</a>                         | <a href="mailto:info@doi.sc.gov">info@doi.sc.gov</a>                                       |
| <a href="mailto:dora_insurance@state.co.us">dora_insurance@state.co.us</a>                 | <a href="mailto:consumeraffairs@insurance.mo.gov">consumeraffairs@insurance.mo.gov</a>         | <a href="mailto:insurance@state.sd.us">insurance@state.sd.us</a>                           |
| <a href="mailto:cid.admin@ct.gov">cid.admin@ct.gov</a>                                     | <a href="mailto:tbidon@mt.gov">tbidon@mt.gov</a>   | <a href="mailto:michele.stone@tn.gov">michele.stone@tn.gov</a>                             |
| <a href="mailto:consumer@delaware.gov">consumer@delaware.gov</a>                           | <a href="mailto:doi.insurancecomplaints@nebraska.gov">doi.insurancecomplaints@nebraska.gov</a> | <a href="mailto:Cindy.Wright@tdi.texas.gov">Cindy.Wright@tdi.texas.gov</a>                 |
| <a href="mailto:disb@dc.gov">disb@dc.gov</a>   | <a href="mailto:dcassetty@doi.nv.gov">dcassetty@doi.nv.gov</a>                                 | <a href="mailto:aglick@utah.gov">aglick@utah.gov</a>                                       |
| <a href="mailto:InsuranceCommissioner@flor.com">InsuranceCommissioner@flor.com</a>         | <a href="mailto:consumerservices@ins.nh.gov">consumerservices@ins.nh.gov</a>                   | <a href="mailto:dfr.pubinfo@vermont.gov">dfr.pubinfo@vermont.gov</a>                       |
| <a href="mailto:consumer@oci.ga.gov">consumer@oci.ga.gov</a>                               | <a href="mailto:ombudsman@dobi.nj.gov">ombudsman@dobi.nj.gov</a>                               | <a href="mailto:bureauofinsurance@scc.virginia.gov">bureauofinsurance@scc.virginia.gov</a> |
| <a href="mailto:insurance@dcca.hawaii.gov">insurance@dcca.hawaii.gov</a>                   | <a href="mailto:margaret.pena@osi.nm.gov">margaret.pena@osi.nm.gov</a>                         | <a href="mailto:bruce.lantz@oic.wa.gov">bruce.lantz@oic.wa.gov</a>                         |
| <a href="mailto:consumeraffairs@doi.idaho.gov">consumeraffairs@doi.idaho.gov</a>           | <a href="mailto:consumers@dfs.ny.gov">consumers@dfs.ny.gov</a>                                 | <a href="mailto:OICConsumerServices@wv.gov">OICConsumerServices@wv.gov</a>                 |
| <a href="mailto:Justin.Hammersmith@illinois.gov">Justin.Hammersmith@illinois.gov</a>       | <a href="mailto:marty.sumner@ncdoi.gov">marty.sumner@ncdoi.gov</a>                             | <a href="mailto:ocicomplaints@wisconsin.gov">ocicomplaints@wisconsin.gov</a>               |
| <a href="mailto:doi@idoi.in.gov">doi@idoi.in.gov</a>                                       | <a href="mailto:insurance@nd.gov">insurance@nd.gov</a>   | <a href="mailto&gt;wyinsdep@wyo.gov">wyinsdep@wyo.gov</a>                                  |
| <a href="mailto:insurance@iid.iowa.gov">insurance@iid.iowa.gov</a>                         | <a href="mailto:jana.jarrett@insurance.ohio.gov">jana.jarrett@insurance.ohio.gov</a>           | <a href="mailto:info@commerce.gov.mp">info@commerce.gov.mp</a>                             |
| <a href="mailto:kid.commissioner@ks.gov">kid.commissioner@ks.gov</a>                       | <a href="mailto:donna.dorr@oid.ok.gov">donna.dorr@oid.ok.gov</a>                               | <a href="mailto:ddiaz@osc.pr.gov">ddiaz@osc.pr.gov</a>                                     |
| <a href="mailto:DOI.ConsumerComplaints@ky.gov">DOI.ConsumerComplaints@ky.gov</a>           | <a href="mailto:DFR.InsuranceHelp@dcbs.oregon.gov">DFR.InsuranceHelp@dcbs.oregon.gov</a>       | <a href="mailto:alice.cruz@revtax.guam.gov">alice.cruz@revtax.guam.gov</a>                 |
| <a href="mailto:dominique.jones@ldi.la.gov">dominique.jones@ldi.la.gov</a>                 | <a href="mailto:wrohaly@pa.gov">wrohaly@pa.gov</a>   | <a href="mailto:elizabeth.perri@go.as.gov">elizabeth.perri@go.as.gov</a>                   |
| <a href="mailto:insurance.pfr@maine.gov">insurance.pfr@maine.gov</a>                       |  |  |

Dear Insurance Commissioners of the United States of America,

**Globe Life & AIL Data Protection Breaches**

We last wrote to you on June 12, 2024, regarding significant data vulnerabilities at Globe Life, in which sensitive policy holder details were publicly available. We have attached a copy of our previous letter to the end of this letter.

We write to you again to inform you that these vulnerabilities have not been resolved.

Our previous correspondence detailed security flaws in the [REDACTED] website and the public accessibility of several [REDACTED] spreadsheets containing policyholder information. As of February 13, 2025, this vulnerability remains unresolved; any user with the URL to the [REDACTED] spreadsheets can access them without signing in. The spreadsheets are accessible at the following URLs:

[REDACTED]  
[REDACTED]  
[REDACTED]

The URLs to the spreadsheets are easily accessible through [REDACTED] webpage<sup>1</sup>. [REDACTED]  
[REDACTED]  
[REDACTED]<sup>2</sup>. This indicates that, instead of implementing *any* security measures to lock sensitive client information, agencies have simply removed the unprotected link from the new iteration of their website.

<sup>1</sup> [REDACTED]  
<sup>2</sup> [REDACTED]



## Information contained in vulnerabilities

Upon re-inspection, we have found that [REDACTED] divulge a much greater extend of sensitive information than we initially thought. The following (inexhaustive) list of sensitive data includes:

- Policyholder names, policy numbers, coverage types, premiums and phone numbers.

| AgentID    | Type       | Pers Pr    | Insured's Name | Policy #   | Life or | Plan Short Name | Bill For | Bill Mode | Issue Date | Run Date  | Annualized Premi |
|------------|------------|------------|----------------|------------|---------|-----------------|----------|-----------|------------|-----------|------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLR3FN          | G        | 01        | 4/15/2023  | 1/15/2024 | -745.85          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLP3FN          | G        | 01        | 3/1/2024   | 4/10/2024 | -302.16          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLP3MN          | G        | 01        | 3/1/2024   | 4/10/2024 | -330.48          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | STRC10FN        | G        | 01        | 3/27/2024  | 4/11/2024 | -364.08          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | A&H     | A71MRIFL        | G        | 01        | 4/15/2023  | 1/15/2024 | -124.92          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLP3MN          | G        | 01        | 3/1/2024   | 4/10/2024 | -1,152.00        |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | STLCH           | G        | 01        | 3/1/2024   | 4/10/2024 | -75.00           |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLR3FN          | G        | 01        | 3/1/2024   | 4/10/2024 | -492.44          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | STRC10FN        | G        | 01        | 3/1/2024   | 4/10/2024 | -607.00          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLR3FN          | G        | 01        | 3/23/2024  | 4/23/2024 | -135.12          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | A&H     | H34MFL3         | G        | 01        | 4/15/2023  | 1/15/2024 | -106.92          |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED]     | [REDACTED] | LIFE    | WLP3MN          | G        | 01        | 3/16/2023  | 1/15/2024 | -308.44          |

[REDACTED] spreadsheet

- The status and reasons for lapses, underwriting denials, trial applications and modifications.

|            |                       |      |      |      |  |
|------------|-----------------------|------|------|------|--|
| [REDACTED] | WODS- SIGNED AMDT NTO | 4/20 | 5/4  | 6/21 | GOING TO NTO CLIENT DOES NOT WANT      |
| [REDACTED] | WOD- NO PRD NTO       | 5/2  | 5/16 | 7/2  | HARD TO REACH CLIENT                   |
| [REDACTED] | SIGNED AMDT NTO       | 5/3  | 5/17 | 7/3  | CLIENT DOES NOT WANT REDUCTION         |
| [REDACTED] | SIGNED AMDT NTO       | 5/13 | 5/27 | 6/29 | HANNAH WANTS TO REOPEN                 |
| [REDACTED] | JW- APS INC           | 6/21 | 7/1  | 7/3  |  |
| [REDACTED] | JW- EXAM WTH          | 6/22 | 7/2  | 7/3  | TRYING TO SCHEDULE                     |
| [REDACTED] | JW- APS INC           | 6/29 | 7/9  | 7/9  |  |
| [REDACTED] | MAX COV DEC           | 7/7  | 7/17 | 8/7  | INFORMATION IS VERIFIED, WITH UW       |
| [REDACTED] | MAX COV DEC           | 7/7  | 7/17 | 8/7  | INFORMATION IS VERIFIED, WITH UW       |
| [REDACTED] | MAX COV DEC           | 7/7  | 7/17 | 8/7  | INFORMATION IS VERIFIED, WITH UW       |
| [REDACTED] | WODS- COD TRIAL NTO   | 5/12 | 5/26 | 7/12 | CARLA CALLING TODAY 7.14 FOR SIGNATURE |
| [REDACTED] | JW- APS INC           | 6/30 | 7/10 | 7/17 |  |
| [REDACTED] | WODS- COD WTH         | 7/12 | 7/26 | 9/12 | CLIENT WILL TAKE RT-99 WAITING ON SIG  |
| [REDACTED] | JW- APS               | 6/23 | 7/3  | 7/24 | HERBERT WORKING ON IT                  |
| [REDACTED] | JW- DEPRESSION Q nto  | 7/4  | 7/14 | 8/7  | REOPEN SUBMITTED + QUESTIONNAIRE       |
| [REDACTED] | JW- APS CLTBS INC     | 7/28 | 8/7  | 8/7  |  |
| [REDACTED] | JW- 800# WTH          | 8/1  | 8/11 | 8/28 |  |
| [REDACTED] | DECLINED TRIAL        | 4/11 | 4/16 | 5/8  | APS RECEIVED PENDING REVIEW            |
| [REDACTED] | WODS- SIGNED AMDT     | 6/3  | 6/17 | 8/17 | WILL RESCHEDULE EXAM                   |
| [REDACTED] | JW- INC APS NO PRD    | 7/28 | 8/7  | 7/3  | EXAM COMPLETED PENDING REVIEW          |

[REDACTED] spreadsheet

- Notes by agents in some cases including references to arrests, incarcerations, financial conditions, medical prescriptions and medical conditions.
  - Some entries explicitly reference policyholders' medical conditions with comments such as "UW- 800# DEPRESSION Q DCL" and "ELEVATED LACTATE DEHYDROGENASE- CAN BE RECONSIDERED IF CLIENT CAN SHOWS NORMAL LDH LEVELS".
  - Some entries explicitly reference policyholders' arrest records with comments such as "UW- 800# ALCOHOL/ ARREST Qs NOPRD TRIAL INC" and "DECLINED- ARREST HISTORY".
- Information we believe belongs to minors, indicated by agent notes regarding parental signatures and questionnaires.

|            |   |       |       |       |   |
|------------|---|-------|-------|-------|---|
| [REDACTED] | WODS COD NO PRD NTO   | 8/2   | 8/16  | 10/1  | STILL CAN'T REACH CLIENT  |
| [REDACTED] | WODS- SIGNED AMDT WTH                                       | 8/18  | 9/1   | 10/18 | CANCELLING THIS POLICY - WILL REWRITE WITH PARENTS AS OWNERS        |
| [REDACTED] | JW- APS DR SAID NOT P INC                                   | 9/21  | 10/1  | 10/2  |   |
| [REDACTED] | JW- APS DCL   | 8/8   | 8/18  | 8/21  | NEW INFO SUBMITTED 8.14   |
| [REDACTED] | SIGNED AMDT NTO   | 8/8   | 8/22  | 10/11 | DO NOT REASSIGN WILL FALL OFF                                       |
| [REDACTED] | SIGNED AMDT   | 8/9   | 8/23  | 10/10 | DOES NOT WANT RATINGO STILL TRYING TO REACH PARENTS TO GET FULL AMT |
| [REDACTED] | JW- APS SPECIAL AUTH- PARENT SIG DOES NOT MATCH SIG ON FILE | 12/6  | 12/16 | 11/27 | MEDICAL RECORDS RECEIVED  |
| [REDACTED] | JW- 800# VERIFY PARENTS COVERAGE DCL MAX COVERAGE           | 12/15 | 12/25 | 1/15  | MOTHER CALLED- H.O SAYS NOTHING IS NEEDED                           |
| [REDACTED] | DCL MAX COVERAGE  | 3/30  | 4/9   | 4/29  |   |
| [REDACTED] | WODS - COD - NOPROD WTH                                     | 4/3   | 4/17  | 6/4   | REFUSED COD   |
| [REDACTED] | JW- NEED NEW APPLICATION NOPRD WTH IPSTP                    | 4/23  | 5/3   | 5/20  | TRYING TO REACH APPLICANT   |
| [REDACTED] | JW- APS NOPRD WITHDRAWN                                     | 4/16  | 4/26  | 5/20  | REOPEN REQUEST 5.9  |
| [REDACTED] | WODS- SIGNED AMDT NTO                                       | 5/1   | 5/15  | 7/1   | CONTESTING EXCLUSION- WITH SR UW                                    |
| [REDACTED] | WODS- SIGNED AMDT NTO                                       | 5/4   | 5/18  | 7/4   | CONSERVATION TEAM WORKING THESE                                     |
| [REDACTED] | WODS- SIGNED AMDT NTO                                       | 5/4   | 5/18  | 7/4   | CONSERVATION TEAM WORKING THESE                                     |
| [REDACTED] | WODS- COD NOPRD NTO   | 5/30  | 6/13  | 7/30  | WILL NOT TAKE BECAUSE DAUGHTER WS DECLINED- PUT NOPRD               |
| [REDACTED] | JW- APS WTH   | 9/7   | 9/17  | 10/7  | APS RECEIVED DENISE REOPENING                                       |
| [REDACTED] | JW- EXAM WTH  | 10/1  | 10/11 | 10/28 | RESULTS RECEIVED- PENDING REVIEW                                    |
| [REDACTED] | JW- NEED SC APP NOPRD INC                                   | 10/1  | 10/11 | 10/14 |   |
| [REDACTED] | JW- NEED SC APP NOPRD INC                                   | 10/1  | 10/11 | 10/14 |   |
| [REDACTED] | JW- 800# NEED RX DETAILS DCL                                | 10/9  | 10/19 | 11/11 | DECLINED DUE TO INFORMATION FROM CALL/ STROKE                       |
| [REDACTED] | JW- 800# CHILD PARENT Q DCL                                 | 10/22 | 11/1  | 11/18 | MAX COVERAGE  |

[REDACTED] spreadsheet (bright orange highlights added)



These spreadsheets are also currently in use with policies from as recently as February 2025.

| PolicyHolder Name | Assigned User | Type                       | Impc    | D        | NTC     |
|-------------------|---------------|----------------------------|---------|----------|---------|
|                   |               | JW- 800# VERIFY RX HISTORY | 2/12/25 | 2/22/25  | 3/17/25 |
|                   |               | MODS- SIGNED AMDT          | 2/12/25 | 2/26/25  | 4/15/25 |
|                   |               | MODS- SIGNED AMDT          | 2/12/25 | 2/26/25  | 4/15/25 |
|                   |               | MODS- SIGNED AMDT          | 2/5/25  | 2/19/25  | 4/7/25  |
|                   |               | JW- APS                    | 2/4/25  | 2/14/25  | 3/3/25  |
|                   |               | JW- APS TRIAL INC          | 1/28/25 | 2/7/25   | 2/24/25 |
|                   |               | JW- APS                    | 1/4/25  | 1/14/25  | 2/17/25 |
|                   |               | MODS- SIGNED AMDT          | 12/4/24 | 12/18/24 | 2/4/25  |

spreadsheet

The number of policies assigned to each agent category has also changed compared to the previous count in June 2024.

| June 2024    |              |            |              |
|--------------|--------------|------------|--------------|
| Sheet Name   | Policy Count | Sheet Name | Policy Count |
|              | 34           |            | 293          |
|              | 10           |            |              |
|              | 22           |            |              |
|              | 6            |            |              |
|              | 16           |            |              |
|              | 13           |            |              |
|              | 5            |            |              |
|              | 18           |            |              |
|              | 19           |            |              |
|              | 46           |            |              |
|              | 85           |            |              |
|              | 48           |            |              |
|              | 79           |            |              |
|              | 54           |            |              |
|              | 28           |            |              |
|              | 36           |            |              |
|              | 89           |            |              |
|              | 27           |            |              |
|              | 129          |            |              |
| <b>Total</b> |              |            | 1057         |

  

| February 2025 |              |            |              |
|---------------|--------------|------------|--------------|
| Sheet Name    | Policy Count | Sheet Name | Policy Count |
|               | 8            |            | 293          |
|               | 17           |            |              |
|               | 10           |            |              |
|               | 10           |            |              |
|               | 12           |            |              |
|               | 4            |            |              |
|               | 9            |            |              |
|               | 4            |            |              |
|               | 19           |            |              |
|               | 17           |            |              |
|               | 74           |            |              |
|               | 132          |            |              |
|               | 66           |            |              |
|               | 123          |            |              |
|               | 75           |            |              |
|               | 34           |            |              |
|               | 48           |            |              |
|               | 122          |            |              |
| <b>Total</b>  |              |            | 1077         |

The spreadsheet was created in April 2022 while the spreadsheet was created in January 2023. They have been publicly accessible since at least May 2024 though we believe they have been publicly accessible since their creation.



## Violations:

As we wrote in our previous letter, we believe that Globe Life and American Income Life's data management practices breach the following provisions:

### NAIC Insurance Data Security Model Law:

- Section 4(D)(2)(a): Failure to implement access controls to protect Nonpublic Information.
- Section 4(D)(2)(g): Failure to utilize effective security controls, such as Multi-Factor Authentication.

### Gramm-Leach-Bliley Act (GLBA):

- FTC Title 16 CFR Part 314: Failing to limit access to necessary customer information, monitor user activity, and implement multifactor authentication.

### Health Insurance Portability and Accountability Act (HIPAA):

- DHHS Title 45 CFR 164.306(a): Failing to meet general security requirements.
- DHHS Title 45 CFR 164.312(a)(2)(i): Not using unique user identification.
- DHHS Title 45 CFR 164.308(a)(3)(i): Lacking appropriate workforce security policies.
- DHHS Title 45 CFR 164.312(d): Not authenticating the person or entity accessing sensitive information.

### California Financial Information Privacy Act (CFIPA):

- Section 4056(a)(2)(B): Failing to limit the use of nonpublic personal information to authorized transactions.

### Children's Online Privacy Protection Act (COPPA):

- Section 312.8: Failing to ensure the security, confidentiality, and integrity of personal information collected from children.

## Conclusion and Requests:

We reiterate the closing remarks from our previous letter:

“We are bringing this to your attention because it has become clear to us that Globe Life exercises no effective oversight over its subsidiaries and agencies whilst providing them with unfettered access to sensitive policyholder information. In separate issues Globe Life has distanced themselves from the actions of its agents using their 1099 contractor status as a shield.

Nonetheless, as the ultimate insurer and custodian of policyholder information it is their responsibility to ensure their compliance with the relevant regulations. We do not believe that these are the only violations the company is responsible for.”

Globe Life has failed to ensure the security of its policyholders' data even after we reported these breaches to you. [REDACTED]

If we had not reported the initial vulnerabilities, it is unclear how long it would have gone unaddressed by the company. After almost 9 months, those same vulnerabilities are still unresolved.

Our ability to investigate further flaws in Globe Life's security pales in comparison to that of your offices. Given the **complete** lack of comprehensive data protection policies at all sample agencies we have explored, we believe these flaws are systemic across Globe Life's business.



We reiterate our urge for immediate action:

1. Address the violations detailed above.
2. Conduct a thorough investigation of Globe Life, American Income Life, and their agencies for additional violations.
3. Inform the affected individuals of the unsafe storage and processing of their data.
4. Make a public announcement about the ongoing breach given its scale and severity.
5. Request undertakings from Globe Life Inc. to restructure its information and data management practices to ensure compliance with all relevant data protection and privacy regulations.

We intend to disclose the existence of these breaches publicly on February 17, 2025, to ensure Globe Life's policyholders are aware that their personal information, medical information, is available freely on the web. We do not intend to disclose instructions on how to access the data.

The above, in addition to our findings, demonstrates a clear and persistent disregard for required data protection and management practices.

We trust that this disclosure will prompt swift and decisive action to protect consumers.

Yours faithfully

Viceroy Research, LLC  
1901 Orange Street  
Wilmington  
DE 19801, USA



### **Attention: Whistleblowers**

Viceroy encourage any parties with information pertaining to misconduct within Globe Life, its affiliates, or any other entity to file a report with the appropriate regulatory body.

We also understand first-hand the retaliation whistleblowers sometimes face for championing these issues. Where possible, Viceroy is happy act as intermediaries in providing information to regulators and reporting information in the public interest in order to protect the identities of whistleblowers.

You can contact the Viceroy team via email on [viceroy@viceroyresearch.com](mailto:viceroy@viceroyresearch.com).

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