

SECURITIES AND EXCHANGE COMMISSION

FORM TA-1/A

Application for registration as a transfer agent filed pursuant to the Securities Exchange Act of 1934 [amend]

Filing Date: **2022-07-07**
SEC Accession No. [0001424912-22-000008](#)

([HTML Version](#) on [secdatabase.com](#))

FILER

se2, LLC/TA

CIK: [1424912](#) | IRS No.: **202640636** | State of Incorporation: **KS** | Fiscal Year End: **1231**
Type: **TA-1/A** | Act: **34** | File No.: [084-06285](#) | Film No.: **221079107**

Mailing Address
*ONE SECURITY BENEFIT
PLACE
TOPEKA KS 66636-0001*

Business Address
*ONE SECURITY BENEFIT
PLACE
TOPEKA KS 66636-0001
(785) 438-3000*

X0405TA-1/A0001424912XXXXXXXXX084-06285trueLIVESECse2, LLC/TAse2, inc./TA336479One Security Benefit PlaceTopekaKS66636N785-438-3000NNNYMUFG INVESTOR SERVICES (US), LLS084-05475805 KING FARM BLVDSUITE 600ROCKVILLEMD20850OtherMark Schultis05/05/2020CEOOFFICER05/01/2022MARY ANNE DURALL06/05/2012SR. VICE PRESIDENTOFFICERTHOMAS M. SPENCER09/30/2010SR. VICE PRESIDENT, BUSINESS DEVELOPMENTOFFICERLISA M. YOUNG09/30/2010ASSISTANT TREASUREROFFICERBARRY G. WARD11/22/2013SR. VICE PRESIDENT & TREASUREROFFICERGREG L. HERRS11/22/2016SR. VICE PRESIDENTOFFICERDeepa Nayini06/01/2021VP, General Counsel & SecretaryOfficer01/26/2022Janet Duloher05/02/2016VP, Head of Human ResourcesOfficer06/17/2022Security Benefit Corporation02/14/2005Sole Member se2 HoldCo, LLCSole MemberSE2 HOLDINGS, LLC10/21/2013SOLE MEMBER IN SE2, LLCMEMBERSE2 HOLDCO, LLC10/21/2013Member SE2 ASSET HOLDINGS, LLCINDIRECT INTERESTELDRIDGE SBC HOLDINGS, LLC07/01/2010SHAREHOLDER - SECURITY BENEFIT CORPINDIRECT INTERESTELDRIDGE INDUSTRIES, LLC02/01/2017MEMBER - ELDRIDGE SBC HOLDINGS, LLCINDIRECT INTERESTSBT INVESTORS, LLC02/01/2017MEMBER - ELDRIDGE INDUSTRIES, LLCINDIRECT INTERESTNZC CAPITAL, LLC02/01/2017MEMBER - SBT INVESTORS, LLCINDIRECT INTERESTTODD L. BOEHL02/01/2017MEMBER - NZC CAPITAL, LLCINDIRECT INTERESTNANCY J. ROHN08/25/2017ASSISTANT SECRETARYOFFICERJohn McConnell07/28/2020CFOOfficerBrad Medd11/13/2020CTOOfficerMichael Celi03/15/2021Vice PresidentOfficerMilner Fenandoe06/30/2021Vice PresidentOfficerCarmen Hill05/04/2018Chief Privacy OfficerOfficerGeorge Esposito03/24/2022VP, General Counsel and SecretaryOfficerJohn Zucco03/07/2022Vice PresidentOfficerChristopher Luisa03/07/2022Vice PresidentOfficerSE2 Asset Holdings, LLC06/11/2021Shareholder -- SE2 Holdings, LLCIndirect InterestRob Frederick05/16/2022President and Chief Operating OfficerOfficerIan Jeffrey06/15/2022Head of People and CultureOfficerLimited Liability CompanyNNNNNNNNNNNNNYSecurity Distributors, Inc. (SDI)Consent Order04/13/1978New York Securities CommissionThe applicant is under common control with SDI a registered broker/dealer. The NY Securities Commission alleged that SDI failed to file renewals of its broker/dealer.SDI consented to a \$2,000 monetary fine and was ordered to cease and desist from further violations.First Security Benefit Life Insurance and Annuity Company of New York (FSBL)Stipulation No. 2010-0095-S02/26/2010State of New York Insurance Department (NYID)The NYID conducted a routine triennial market conduct exam for the period of January 1, 2004 through December 31, 2006. During such exam it found that FSBL unintentionally violated various provisions of the New York Insurance Department's replacement regulation ("Regulation 60").FSBL entered into a stipulation and consented to a \$25,000 fine and further agreed to take all steps necessary to prevent recurrence of similar Regulation 60 violations.Security Benefit Life Insurance Company (SBL)Stipulation & Consent Order05/29/2007Illinois Dept. of Financial & Professional Regulation-Division of InsuranceSBL failed to timely file a Policy In Form Mandatory Annual Statement Supplement Data Call as required by IL Div. of Insurance Regulations.SBL and the IL Div. of Insurance entered into a Stipulation 7 Consent Order agreeing to a \$2,000 fine and SBL agreed to comply with the Regulation in future.Security Benefit Life Insurance Company (SBL)Consent Order-Report ID #218603/28/2007Minnesota Commissioner of Commerce (MN COC)The Consent Order was the result of a consumer complaint against SBL alleging errors in the administration of an annuity contract resulting in incorrect payments being made to an annuitant, in violation of MN Statutes.The MN COC and SBL entered into a Consent Order wherein SBL agreed to an informal disposition of the matter without a hearing and paid a civil penalty of \$2,500.Security Benefit Life Insurance Company (SBL)Consent Order11/30/2005State of Nevada Division of Insurance (NDI)SBL failed to timely file an Annual Certification of Advertising as required by NDI Regulations.SBL consented to a fine of \$500 to settle the cause.Security Benefit Life Insurance Company (SBL)Statutory Penalty01/31/2007Commonwealth of Virginia Commissioner of Insurance (VCI)SBL failed to timely pay agent appointment fees pursuant to VCI Regulations.The VCI assessed a statutory penalty in the amount of \$3,550 against SBL.Security Benefit Life Insurance Company (SBL)Case No. C109-2006-6867504/04/2006Alabama Department of Insurance (ADI)On 4/4/2006, the ADI entered an Order to Show Cause against SBL regarding its failure to pay an invoice for agent appointment fees dated 1/2/2006. SBL paid outstanding invoice on 4/13/2006, and remitted a letter to the ADI explaining its non-payment was not a

willful violation of ADI Regulations. On 5/17/2006, the ADI entered an Order Lifting Order to Show Cause and Settlement Agreement. SBL consented to a \$500 fine and agreed to promptly pay invoices for the continuation of producer appointments in the future. Security Distributors, LLC In Re: Security Distributors, LLC - 00007/26/2017 Louisiana Department of Insurance Security Distributors inadvertently answered no to the regulatory action question on the Louisiana agency license application and thus failed to disclose a previously settled FINRA matter. Agreement & Consent to \$250 Fine. Security Distributors, LLC State of Oklahoma, ex rel. John D Doak, Insurance Commissioner 05/09/2017 Oklahoma Insurance Department Security Distributors inadvertently answered no to the regulatory action question on the Oklahoma agency license application and thus failed to disclose a previously settled FINRA action. Consent to Censure and Fine of \$200 SE2, LLC SE2, LLC Administrative Fine & Consent to Fine 05/12/2017 Nevada Division of Insurance It was alleged that SE2, LLC did not file its annual report with the Nevada Division of Insurance within 90 days after the fiscal year end as is required by NV Third Party Administrator statutes. SE2, LLC entered into an agreement and consented to a fine in the amount of \$500. SE2, LLC SE2, LLC Administrative Fine 12/09/2021 Kansas Insurance Department It was alleged that SE2, LLC did not file its annual report with the Kansas Insurance Department on its due date as is required by the KS Third Party Administrator statutes. SE2, LLC consented to a fine in the amount of \$1,000. Security Distributors, Inc. (SDI) Administrative Fine and Consent to Fine 07/02/1974 AG of State of New York, Bureau of Securities On July 2, 1974, the Attorney General of the State of New York, Bureau of Securities issued a cease and desist/injunction for an alleged failure to file renewal of the broker/dealer statements pursuant to the General Business Laws of the State of New York. A fine of \$4,000 was levied and paid on April 13, 1978. Security Benefit Life Insurance Company (SBL) Administrative Fine 05/30/2014 Kansas Insurance Department In May 2014, the Kansas Insurance Department issued a summary order to Security Benefit Life Insurance Company and imposed a fine of \$1,000 for three errors for untimely responses under K.A.R. 40-1-34, Section 6(B) to the Kansas Insurance Department during the investigations of complaints. In May 2014, the Kansas Insurance Department issued a summary order to Security Benefit Life Insurance Company and imposed a fine of \$1,000. Security Benefit Life Insurance Company (SBL) Administrative Fine 09/30/2016 Connecticut Insurance Department In September 2016, the Connecticut Insurance Department fined Security Benefit Life Insurance Company \$10,500 for violations described in the Market Conduct Report and Stipulation and Consent Order. Fine was paid and no further action was taken by the Connecticut Insurance Department. Security Benefit Life Insurance Company (SBL) Administrative Fine 06/08/2018 Michigan Department of Insurance On June 8, 2018, Security Benefit Life Insurance Company was fined \$5,000 by the Michigan Department of Insurance and Financial Services for failure to comply with Section 500.4037(b) of the Code. The Michigan Order was executed on June 8, 2018, and Michigan acknowledged receipt of the payment of \$5,000 on June 15, 2018. Security Benefit Life Insurance Company (SBL) Administrative Fine 10/16/2018 Delaware Department of Insurance Security Benefit Life Insurance Company was fined \$121,500 by the Delaware Department of Insurance for various compliance exceptions noted during their market conduct exam for the period January 1, 2014 through December 31, 2016. Fine was paid and no further action was taken by Delaware Department of Insurance. Security Benefit Life Insurance Company (SBL) Administrative fine 10/29/2021 Delaware Department of Insurance Stipulation and consent order entered with a fine of \$55,000 resulting from miscellaneous examination findings in a 2020 market conduct exam conducted by the Delaware Department of Insurance. Fine was paid and no further action was taken by the Delaware Department of Insurance. NNY SE2, LLC (formerly known as SE2, Inc.) TPA fees not paid 10/05/2015 Utah Insurance Department SE2, LLC (formerly known as SE2, Inc.) received a notice dated October 5, 2015 from the Utah Insurance Department notifying SE2 that its Third Party Administrator was inactivated on September 30, 2015 for failure to pay the applicable renewal fees. The fees were paid and the license was reinstated on October 13, 2015 and is currently Active. NNY Security Distributors, LLC Notice of Acceptance of Letter of Acceptance, Waiver and Consent 09/28/2016 FINRA For approximately 11 months, Security Distributors relied on an exemption to SEC Rule 15c3-3 without satisfying the terms of that exemption, which also constituted a violation of FINRA Rule 2010. Acceptance, Waiver & Consent, censure and \$20,000 fine. NNNNNN George Esposito 7854383000 Vice President, General Counsel and Secretary 07/07/2022