

BrokerCheck Report

SYMETRA SECURITIES, INC.

CRD# 739

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

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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Thank you for using FINRA BrokerCheck.



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)



SYMETRA SECURITIES, INC.

CRD# 739

SEC# 8-13470

Main Office Location

777 108TH AVE NE, SUITE 1200
BELLEVUE, WA 98004-5135
Regulated by FINRA Denver Office

Mailing Address

777 108TH AVE NE, SUITE 1200
BELLEVUE, WA 98004-5135

Business Telephone Number

800-796-3872

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 Washington on 08/24/1967.

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 firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 51 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 2 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

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	3

The number of disclosures from non-registered control affiliates is 15



Firm Profile

This firm is classified as a corporation.
This firm was formed in Washington on 08/24/1967.
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.

SYMETRA SECURITIES, INC.
Doing business as SYMETRA SECURITIES, INC.
CRD# 739
SEC# 8-13470

Main Office Location
777 108TH AVE NE, SUITE 1200
BELLEVUE, WA 98004-5135
Regulated by FINRA Denver Office

Mailing Address
777 108TH AVE NE, SUITE 1200
BELLEVUE, WA 98004-5135

Business Telephone Number
800-796-3872

Other Names of this Firm

Name	Where is it used
SYMETRA SECURITIES, INC.	AK, AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, WY



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):	SYMETRA FINANCIAL CORPORATION
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	OWNER
Position Start Date	08/2004
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):	BALKOVETZ, CHANTEL LEE 2490011
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	05/2020
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):	DIMITRI, DAVID MICHAEL 4806001
Is this a domestic or foreign entity or an individual?	Individual
Position	SECRETARY
Position Start Date	05/2024

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? No

Is this a public reporting company? No

Legal Name & CRD# (if any): DOW, SHANEN LYNN
7676848

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

Position ASSISTANT TREASURER

Position Start Date 12/2022

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): ELLIS, COURTNEY LYNN
5460601

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

Position CHIEF OPERATING OFFICER

Position Start Date 05/2019

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): FARRELL, ANDREW MICHAEL

Firm Profile



Direct Owners and Executive Officers (continued)

	4463467
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT, DIRECTOR
Position Start Date	01/2013
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
<hr/>	
Legal Name & CRD# (if any):	HANSON, COLLEEN 7271134
Is this a domestic or foreign entity or an individual?	Individual
Position	ASSISTANT VICE PRESIDENT, FINANCIAL AND OPERATIONS PRINCIPAL
Position Start Date	05/2025
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
<hr/>	
Legal Name & CRD# (if any):	MURPHY, COLLEEN MARY 4842602
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	09/2013
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): NORBERG, KRISTIN ROUST
7033021

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

Position VICE PRESIDENT

Position Start Date 09/2018

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): OBERDECK, ANDREW A
8015633

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

Position ASSISTANT SECRETARY

Position Start Date 11/2024

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): OTTO, JOSEPHINE R
8015301

Firm Profile



Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	ASSISTANT SECRETARY
Position Start Date	11/2024
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): RABIN, KEVIN WILLIAM
7033042

Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	09/2018
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): SANDERS, BARBARA ANN
2206030

Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER
Position Start Date	10/2018
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? No

Is this a public reporting company? No

Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.



Indirect Owners

Legal Name & CRD# (if any):	SUMITOMO LIFE INSURANCE CO.
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	SYMETRA FINANCIAL CORPORATION
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	02/2016
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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 currently registered with the SEC, 1 SRO and 51 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	10/14/1967

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: Yes

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	10/18/1967



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	10/24/1981
Alaska	Approved	08/28/1986
Arizona	Approved	04/12/1968
Arkansas	Approved	09/20/1968
California	Approved	01/01/1970
Colorado	Approved	02/01/1983
Connecticut	Approved	03/12/1969
Delaware	Approved	05/23/1997
District of Columbia	Approved	10/01/1988
Florida	Approved	04/27/1983
Georgia	Approved	09/22/1981
Hawaii	Approved	06/05/1997
Idaho	Approved	01/01/1968
Illinois	Approved	05/16/1968
Indiana	Approved	10/21/1981
Iowa	Approved	07/14/1983
Kansas	Approved	06/28/1995
Kentucky	Approved	07/16/1982
Louisiana	Approved	04/20/1983
Maine	Approved	01/02/1996
Maryland	Approved	10/03/1981
Massachusetts	Approved	11/25/1986
Michigan	Approved	05/11/1995
Minnesota	Approved	09/09/1986
Mississippi	Approved	10/14/1981
Missouri	Approved	07/18/1983
Montana	Approved	04/20/1983
Nebraska	Limited	10/08/1981
Nevada	Approved	07/19/1983
New Hampshire	Approved	09/15/1994
New Jersey	Approved	07/15/1983
New Mexico	Approved	10/07/1981
New York	Approved	03/30/1984

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	07/15/1982
North Dakota	Limited	05/30/1989
Ohio	Approved	07/16/1982
Oklahoma	Approved	07/17/1982
Oregon	Approved	10/24/1981
Pennsylvania	Approved	08/20/1986
Rhode Island	Approved	02/01/1983
South Carolina	Approved	10/28/1981
South Dakota	Approved	06/14/1995
Tennessee	Approved	05/15/1995
Texas	Limited	07/25/1983
Utah	Approved	08/20/1986
Vermont	Approved	08/31/1994
Virginia	Approved	09/27/1981
Washington	Approved	09/21/1967
West Virginia	Approved	09/30/1981
Wisconsin	Approved	06/27/1968
Wyoming	Approved	03/15/1968



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 2 types of businesses.

Types of Business

Mutual fund retailer

Other - SYMETRA SECURITIES SERVES AS THE UNDERWRITER FOR SYMETRA LIFE INSURANCE COMPANY'S VARIABLE INSURANCE PRODUCTS AND REGISTERED INDEXED ANNUITY PRODUCTS.

Other Types of Business

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

This firm does not engage in other non-securities business.

Non-Securities Business Description:

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 have books or records maintained by a third party.

Name: REGED, INC.

Business Address: 2100 GATEWAY CENTRE BLVD
MORRISVILLE, NC 27560

Effective Date: 07/29/2025

Description: REGED, INC.'S ADVERTISING REVIEW APPLICATION CAPTURES AND ARCHIVES ADVERTISING AND MARKETING DOCUMENTS FOR REGISTERED PRODUCTS SUBMITTED FOR REVIEW.

Name: WIPRO, LLC

Business Address: 2 TOWER CENTER BOULEVARD
SUITE 2200
EAST BRUNSWICK, NJ 08816

Effective Date: 04/07/2023

Description: WIPRO STORES HISTORICAL RECORDS RELATED TO PRODUCTS NO LONGER OFFERED BY THE FIRM FOR WHICH LIMITED ADMINISTRATIVE SERVICES ARE PROVIDED.

Name: SMARSH, INC.

Business Address: 921 SW WASHINGTON STREET
SUITE 540
PORTLAND, OR 97205

Effective Date: 09/20/2013

Description: SMARSH CAPTURES AND ARCHIVE E-MAILS, TEXT MESSAGES FROM OUR INTERNAL SYSTEM (MICROSOFT TEAMS) AND LINKEDIN POSTS. SMARSH WAS INITIALLY REPORTED UNDER STANDARD 6: COMMUNICATIONS AND OPERATIONAL SYSTEMS, ITEM 2 OF THE CONTINUING MEMBER APPLICATION SUBMITTED ON SEPTEMBER 20, 2013.

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

Industry Arrangements (continued)





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.**

SYMETRA INVESTMENT MANAGEMENT COMPANY is under common control with the firm.

CRD #:	312176
Business Address:	308 FARMINGTON AVENUE 3RD FLOOR FARMINGTON, CT 06032
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	SYMETRA INVESTMENT MANAGEMENT COMPANY AND THE APPLICANT ARE UNDER COMMON CONTROL OF SYMETRA FINANCIAL CORPORATION.

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	3	0



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 3

Reporting Source: Firm

Current Status: Final



Allegations: AS NOTED IN THE CERTIFICATE OF REVOCATION OF AUTHORITY OF FOREIGN CORPORATION TO TRANSACT BUSINESS IN ILLINOIS, SYMETRA SECURITIES, INC. "HAS FAILED TO FILE AN ANNUAL REPORT AND PAY AN ANNUAL FRANCHISE TAX." TO SYMETRA SECURITIES, INC.'S KNOWLEDGE, THE ANNUAL REPORT REFERENCED IS THE ILLINOIS FORM BCA 14.05 FOREIGN CORPORATION ANNUAL REPORT UNDER THE BUSINESS CORPORATION ACT.

Initiated By: STATE OF ILLINOIS OFFICE OF THE SECRETARY OF STATE

Date Initiated: 03/18/2019

Docket/Case Number:

Principal Product Type: Annuity(ies) - Variable

Other Product Type(s): INSURANCE, INDEX-LINKED ANNUITIES.

Principal Sanction(s)/Relief Sought: Revocation

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 04/18/2019

Firm Statement ON APRIL 18, 2019, SYMETRA SECURITIES, INC.'S STATUS AS A FOREIGN CORPORATION IN THE STATE OF ILLINOIS WAS REINSTATED RETROACTIVE TO THE REVOCATION DATE.

Disclosure 2 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: NASD CONDUCT RULE 2110 AND SEC RULE 15C3-1 - RESPONDENT MEMBER USED THE INSTRUMENTALITIES OF INTERSTATE COMMERCE TO EFFECT TRANSACTIONS IN SECURITIES WHILE FAILING TO MAINTAIN REQUIRED NET CAPITAL.

Initiated By: NASD

Date Initiated: 09/07/2004

Docket/Case Number: C3B040025

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: 09/07/2004

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 \$12,500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RESPONDENT MEMBER CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE, THE FIRM IS CENSURED AND FINED \$12,500.

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO MAINTAIN REQUIRED MINIMUM NET CAPITAL

Initiated By: NASD

Date Initiated: 10/02/2003

Docket/Case Number: C3B040025

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/07/2004



Sanctions Ordered:	Censure Monetary/Fine \$12,500.00
Other Sanctions Ordered:	
Sanction Details:	SAFECO SECURITIES, INC. WAS CENSURED AND FINED \$12,500. THE FINE WAS PAID IN FULL ON 09/22/2004
Firm Statement	ON 12/31/99, 12/31/01, 1/31/02, 6/28/02, 7/31/02, 8/30/02, 9/30/02, 10/31/02, 11/29/02, 12/31/02, 1/31/03, 2/28/03, 3/31/03, 5/30/03, 6/30/03, 7/31/03, 08/29/03, AND 9/30/03 SAFECO SECURITIES FAILED TO COMPLY WITH SEC 15C3-1 IN THAT IT USED INSTRUMENTALITIES OF INTERSTATE COMMERCE TO EFFECT TRANSACTIONS IN SECURITIES WHILE FAILING TO MAINTAIN REQUIRED NET CAPITAL OF NOT LESS THAN \$5000.

Disclosure 3 of 3

Reporting Source:	Regulator
Current Status:	Final
Allegations:	DEFENDANT BROKER-DEALER FAILED TO FILE ITS AUDITED FINANCIAL STATEMENTS IN ACCORDANCE WITH VIRGINIA CODE SECTION 13.1-518.1 FOR THE SECOND YEAR.
Initiated By:	VIRGINIA - STATE CORPORATION COMMISSION DIVISION OF SECURITIES
Date Initiated:	08/23/1996
Docket/Case Number:	SEC960075
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:	
Sanctions Ordered:	Monetary/Fine \$500.00
Other Sanctions Ordered:	
Sanction Details:	DEFENDANT BROKER-DEALER WITHOUT ADMITTING OR



DENYING THE ALLEGATIONS, AGREES TO REFRAIN FROM ANY CONDUCT WHICH WOULD CONSTITUTE A VIOLATION OF VIRGINIA CODE SECTION 13.1-518.1 AS LONG AS IT IS REGISTERED AND PAY A PENALTY OF \$500.00.

Regulator Statement

CONTACT: HALL JONES, BROKER-DEALER EXAMINER,
804-371-9016.

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO FILE DECEMBER 31, 1995 ANNUAL REPORT WITHIN THE TEN-DAY TIME LIMIT

Initiated By: STATE OF VIRGINIA, STATE CORPORATION COMMISSION

Date Initiated: 06/03/1996

Docket/Case Number: SEC 960075

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 08/23/1996

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: NO SANCTIONS

Firm Statement ADMINISTRATIVE PROCEEDING, SETTLED 08/23/1996

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	15	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE STATE OF DELAWARE DEPARTMENT OF INSURANCE AS OF DECEMBER 31, 2023, SYMETRA LIFE INSURANCE COMPANY'S ("SLIC"), PRACTICES AND PROCEDURES WERE FOUND TO NOT COMPLY WITH CERTAIN SECTIONS OF THE DELAWARE ADMINISTRATIVE CODE RELATED TO: AGENCY SERVICES LICENSING, APPOINTMENTS AND TERMINATIONS, REPLACEMENTS, ILLUSTRATIONS, AND NEW BUSINESS PROCESSING.
Initiated By:	STATE OF DELAWARE DEPARTMENT OF INSURANCE
Date Initiated:	01/17/2025
Docket/Case Number:	5568
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:	Stipulation and Consent
Resolution Date:	01/23/2025
Sanctions Ordered:	Monetary/Fine \$99,000.00
Other Sanctions Ordered:	
Sanction Details:	AN ADMINISTRATIVE PENALTY OF \$99,000 WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). PENALTY WAS PAID ON 1/23/2025. NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE STATE OF DELAWARE DEPARTMENT OF INSURANCE AS OF DECEMBER 31, 2023, SYMETRA LIFE INSURANCE COMPANY'S PRACTICES AND PROCEDURES WERE FOUND TO NOT COMPLY WITH CERTAIN SECTIONS OF THE DELAWARE ADMINISTRATIVE CODE. PURSUANT TO A STIPULATION AND



CONSENT ORDER, SLIC PAID THE DEPARTMENT AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$99,000.00.

Disclosure 2 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	SYMETRA LIFE INSURANCE COMPANY WAS ALLEGED TO HAVE VIOLATED MARYLAND INSURANCE ARTICLE SECTION 27-202(1): MAKE, ISSUE, CIRCULATE, OR CAUSE TO BE MADE, ISSUED, OR CIRCULATED AN ESTIMATE, CIRCULAR, OR STATEMENT THAT MISREPRESENTS THE TERMS OF A POLICY TO BE ISSUED, THE BENEFITS OR ADVANTAGES PROMISED BY THE POLICY, OR THE DIVIDENDS OR SHARE OF THE SURPLUS TO BE RECEIVED ON THE POLICY.
Initiated By:	MARYLAND INSURANCE ADMINISTRATION
Date Initiated:	04/16/2021
Docket/Case Number:	MIA-2021-04-026
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER LEVYING AN ADMINISTRATIVE PENALTY
Resolution:	Consent
Resolution Date:	04/27/2021
Sanctions Ordered:	Monetary/Fine \$7,600.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT PAID WAS AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$7,600.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). THE FINE WAS PAID ON 4/27/2021, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	SYMETRA LIFE INSURANCE COMPANY WAS FOUND TO HAVE VIOLATED MARYLAND INSURANCE ARTICLE SECTION 27-202(1): MAKE, ISSUE, CIRCULATE, OR CAUSE TO BE MADE, ISSUED, OR CIRCULATED AN ESTIMATE, CIRCULAR, OR STATEMENT THAT MISREPRESENTS THE TERMS



OF A POLICY TO BE ISSUED, THE BENEFITS OR ADVANTAGES PROMISED BY THE POLICY, OR THE DIVIDENDS OR SHARE OF THE SURPLUS TO BE RECEIVED ON THE POLICY. PURSUANT TO THE CONSENT ORDER, SYMETRA LIFE INSURANCE COMPANY PAID AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$7,600.00.

Disclosure 3 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	SYMETRA LIFE INSURANCE COMPANY WAS FOUND TO HAVE VIOLATED WASHINGTON INSURANCE CODES RCW 48.19.010(2) ISSUING STOP LOSS POLICIES USING RATES OTHER THAN FILED AND APPROVED RATES; RCW 48.21.015(3) BY ISSUING STOP LOSS POLICY THAT DID NOT INCLUDE AN AGGREGATE ATTACHMENT POINT; AND RCW 48.21.015(4) BY ISSUING STOP LOSS POLICY THAT INCLUDED INDIVIDUAL ATTACHMENT POINTS BELOW THE REQUIRED MINIMUM.
Initiated By:	STATE OF WASHINGTON OFFICE OF THE INSURANCE COMMISSIONER
Date Initiated:	03/31/2021
Docket/Case Number:	ORDER NO. 21-0123
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER LEVYING A FINE
Resolution:	Consent
Resolution Date:	04/02/2021
Sanctions Ordered:	Monetary/Fine \$5,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT PAID WAS A FINE IN THE AMOUNT OF \$5,000.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). THE FINE WAS PAID ON 4/2/2021, NO AMOUNT OF THE FINE WAS WAIVED.
Firm Statement	SYMETRA LIFE INSURANCE COMPANY WAS FOUND TO HAVE VIOLATED



WASHINGTON INSURANCE CODES RCW 48.19.010(2) ISSUING STOP LOSS POLICIES USING RATES OTHER THAN FILED AND APPROVED RATES; RCW 48.21.015(3) BY ISSUING STOP LOSS POLICY THAT DID NOT INCLUDE AN AGGREGATE ATTACHMENT POINT; AND RCW 48.21.015(4) BY ISSUING STOP LOSS POLICY THAT INCLUDED INDIVIDUAL ATTACHMENT POINTS BELOW THE REQUIRED MINIMUM. PURSUANT TO THE CONSENT ORDER, SYMETRA LIFE INSURANCE COMPANY PAID A FINE IN THE AMOUNT OF \$5,000.00.

Disclosure 4 of 15

Reporting Source:	Firm
Affiliate:	FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK
Current Status:	Final
Allegations:	AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("THE DEPARTMENT"), COVERING THE PERIOD FROM JANUARY 1, 2011 THROUGH DECEMBER 31, 2015, THE DEPARTMENT FOUND CERTAIN VIOLATIONS OF THE NEW YORK INSURANCE LAW AND/OR REGULATIONS BY FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLICNY). THESE ITEMS RELATED TO AGENT APPOINTMENTS, COMPENSATION, TERMINATION CERTIFICATES, IMPORTANT NOTICE AND DISCLOSURE STATEMENTS AND REPLACEMENTS.
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	09/15/2020
Docket/Case Number:	2020-0279-S
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER
Resolution:	Consent
Resolution Date:	09/15/2020
Sanctions Ordered:	Monetary/Fine \$6,200.00
Other Sanctions Ordered:	



Sanction Details:	TOTAL AMOUNT OF FINE WAS \$6,200.00, THE ENTIRE AMOUNT WAS LEVIED AGAINST FSNLICNY (THE CONTROL AFFILIATE). FINE WAS PAID 09/17/2020, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	<p>AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES ("THE DEPARTMENT"), COVERING THE PERIOD FROM JANUARY 1, 2011 THROUGH DECEMBER 31, 2015, THE DEPARTMENT FOUND VIOLATIONS RELATED TO CERTAIN SECTIONS OF INSURANCE REGULATION 60 (SECOND AMENDMENT), INSURANCE REGULATION 152, AND NEW YORK INSURANCE LAW SECTIONS 2112(B), 2114(A)(1), AND 2112(D).</p> <p>THESE ITEMS RELATED TO AGENT APPOINTMENTS, COMPENSATION, TERMINATION CERTIFICATES, IMPORTANT NOTICE AND DISCLOSURE STATEMENTS AND REPLACEMENTS.</p> <p>FSNLICONY AND THE DEPARTMENT AGREED TO RESOLVE THE MATTER BY EXECUTING A CONSENT ORDER DATED SEPTEMBER 15, 2020 PURSUANT TO WHICH FSNLICONY PAID A \$6,200.00 FINE.</p>

Disclosure 5 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE STATE OF CONNECTICUT INSURANCE DEPARTMENT COVERING THE PERIOD FROM JANUARY 1, 2018 - DECEMBER 31, 2018, THE INSURANCE COMMISSIONER ALLEGED THAT SYMETRA LIFE INSURANCE COMPANY ("SLIC") FAILED TO FOLLOW PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH STATUTORY REQUIREMENTS RESULTING IN TWO PRODUCERS ACTING AS AGENTS OF SLIC WITHOUT REQUIRED APPOINTMENT IN VIOLATION OF CONNECTICUT LAW.
Initiated By:	STATE OF CONNECTICUT INSURANCE DEPARTMENT
Date Initiated:	07/10/2020
Docket/Case Number:	DOCKET MC 20-62
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other



Other Sanction(s)/Relief Sought:	STIPULATION AND CONSENT ORDER
Resolution:	Stipulation and Consent
Resolution Date:	07/10/2020
Sanctions Ordered:	Monetary/Fine \$3,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT OF FINE WAS \$3,000.00; THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID 07/10/2020; NO PORTION OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF A MARKET CONDUCT EXAMINATION FROM MAY 12, 2020 THROUGH JUNE 1, 2020 BY THE STATE OF CONNECTICUT INSURANCE DEPARTMENT COVERING THE PERIOD FROM JANUARY 1, 2018 - DECEMBER 31, 2018, SYMETRA LIFE INSURANCE COMPANY ("SLIC") ADMITTED TO FAILING TO FOLLOW PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH STATUTORY REQUIREMENTS RESULTING IN TWO PRODUCERS ACTING AS AGENTS OF SLIC WITHOUT REQUIRED APPOINTMENT IN VIOLATION OF §38A-702M OF THE CONNECTICUT GENERAL STATUTES. SLIC AND THE DEPARTMENT AGREED TO RESOLVE THE MATTER BY EXECUTING A STIPULATION AND CONSENT ORDER DATED JULY 10, 2020 PURSUANT TO WHICH SLIC PAID A \$3,000 FINE.

Disclosure 6 of 15

Reporting Source:	Firm
Affiliate:	FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK
Current Status:	Final
Allegations:	AN INVESTIGATION BY THE NEW YORK STATE INSURANCE DEPARTMENT OF FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLICNY) FOR THE PERIOD OF JANUARY 1, 2008 THROUGH DECEMBER 31, 2010 REVEALED CERTAIN VIOLATIONS OF THE INSURANCE LAW AND/OR REGULATIONS, INCLUDING SECTION 51.6 OF REGULATION NO. 60, RELATED TO DISCLOSURE STATEMENT USED IN THE SALE OF A POLICY.
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	04/14/2016
Docket/Case Number:	2016-0067-S
Principal Product Type:	Insurance



Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	STIPULATION
Resolution:	Stipulation and Consent
Resolution Date:	04/14/2018
Sanctions Ordered:	Monetary/Fine \$5,700.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT PAID WAS A CIVIL PENALTY IN THE AMOUNT OF \$5700.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLICNY)(THE CONTROL AFFILIATE). FINE WAS PAID 4/14/2016, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AN INVESTIGATION BY THE NEW YORK STATE INSURANCE DEPARTMENT OF FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLICNY) FOR THE PERIOD OF JANUARY 1, 2008 THROUGH DECEMBER 31, 2010 REVEALED CERTAIN VIOLATIONS OF THE INSURANCE LAW AND/OR REGULATIONS, INCLUDING SECTION 51.6 OF REGULATION NO. 60, RELATED TO DISCLOSURE STATEMENT USED IN THE SALE OF A POLICY. PURSUANT TO A STIPULATION, FSNLICNY PAID A CIVIL PENALTY IN THE AMOUNT OF \$5700.00.

Disclosure 7 of 15

Reporting Source:	Firm
Affiliate:	FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK
Current Status:	Final
Allegations:	AN INVESTIGATION BY THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES OF FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLICNY) REVEALED CERTAIN VIOLATIONS OF THE INSURANCE LAW AND/OR REGULATIONS, INCLUDING SECTIONS 3201, 3220, 3204, 403 AND SECTION 41.5 OF REGULATION 143 RELATED TO POLICY FORMS.
Initiated By:	STATE OF NEW YORK DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	08/15/2016
Docket/Case Number:	2016-0115-S



Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	STIPULATION
Resolution:	Stipulation and Consent
Resolution Date:	08/15/2016
Sanctions Ordered:	Monetary/Fine \$249,580.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT PAID WAS A CIVIL PENALTY IN THE AMOUNT OF \$249,580.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST FSNLICNY (THE CONTROL AFFILIATE). FINE WAS PAID 8/16/2016, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AN INVESTIGATION BY THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES OF FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLCNY) REVEALED CERTAIN VIOLATIONS OF THE INSURANCE LAW AND/OR REGULATIONS, INCLUDING SECTIONS 3201, 3220, 3204, 403 AND SECTION 41.5 OF REGULATION 143 RELATED TO POLICY FORMS. PURSUANT TO A STIPULATION, FSNLCNY PAID A CIVIL PENALTY IN THE AMOUNT OF \$249,580.00.

Disclosure 8 of 15

Reporting Source:	Firm
Affiliate:	FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK
Current Status:	Final
Allegations:	AS A RESULT OF A FINANCIAL EXAMINATION BY THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES, FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLCNY) FAILED TO DEMONSTRATE THAT PRICING WAS PERFORMED PRIOR TO THE DATE THE STATEMENT OF SELF-SUPPORT WAS SIGNED IN CONTRAVENTION TO NEW YORK INSURANCE LAW SECTION 4228(H).
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	04/23/2018
Docket/Case Number:	2018-0068-S



Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER
Resolution:	Consent
Resolution Date:	04/23/2018
Sanctions Ordered:	Monetary/Fine \$30,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT PAID WAS AN CIVIL PENALTY IN THE AMOUNT OF \$30,000.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST FSNLICNY (THE CONTROL AFFILIATE). FINE WAS PAID 4/2018, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF A FINANCIAL EXAMINATION BY THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES, FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK (FSNLICNY) FAILED TO DEMONSTRATE THAT PRICING WAS PERFORMED PRIOR TO THE DATE THE STATEMENT OF SELF-SUPPORT WAS SIGNED IN CONTRAVENTION TO NEW YORK INSURANCE LAW SECTION 4228(H). PURSUANT TO A CONSENT ORDER, FSNLICNY PAID A CIVIL PENALTY IN THE AMOUNT OF \$30,000.00.

Disclosure 9 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	AS A RESULT OF A MARKET CONDUCT EXAMINATION CONDUCTED BY THE ILLINOIS DEPARTMENT OF INSURANCE, IT WAS DETERMINED SYMETRA LIFE INSURANCE COMPANY WAS NOT IN COMPLIANCE WITH ILLINOIS INSURANCE CODE (215 ILCS 5/1 ET SEQ.) AND DEPARTMENT REGULATIONS (50 ILL. ADM. CODE 101 ET SEQ.).
Initiated By:	ILLINOIS DEPARTMENT OF INSURANCE
Date Initiated:	04/22/2010
Docket/Case Number:	N/A



Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	STIPULATION AND CONSENT ORDER
Resolution:	Stipulation and Consent
Resolution Date:	04/22/2010
Sanctions Ordered:	Monetary/Fine \$21,000.00
Other Sanctions Ordered:	SYMETRA LIFE INSURANCE COMPANY ("SLIC") WAS REQUIRED TO INSTITUTE AND MAINTAIN PROCEDURES IN ACCORDANCE WITH CERTAIN SECTIONS OF THE ILLINOIS INSURANCE CODE AND DEPARTMENT REGULATIONS AS NOTED IN THE STIPULATION AND CONSENT ORDER. ADDITIONALLY, SLIC WAS REQUIRED TO SUBMIT PROOF OF COMPLIANCE WITH THE ORDERS WITHIN 30 DAYS OF THE EXECUTION OF THE ORDER.
Sanction Details:	TOTAL AMOUNT PAID WAS AN CIVIL FORFEITURE IN THE AMOUNT OF \$21,000.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID APRIL 2010, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF A MARKET CONDUCT EXAMINATION CONDUCTED BY THE ILLINOIS DEPARTMENT OF INSURANCE, IT WAS DETERMINED SYMETRA LIFE INSURANCE COMPANY WAS NOT IN COMPLIANCE WITH ILLINOIS INSURANCE CODE (215 ILCS 5/1 ET SEQ.) AND DEPARTMENT REGULATIONS (50 ILL. ADM. CODE 101 ET SEQ.). SYMETRA LIFE INSURANCE COMPANY ("SLIC") WAS REQUIRED TO INSTITUTE AND MAINTAIN PROCEDURES IN ACCORDANCE WITH CERTAIN SECTIONS OF THE ILLINOIS INSURANCE CODE AND DEPARTMENT REGULATIONS AS NOTED IN THE STIPULATION AND CONSENT ORDER. ADDITIONALLY, SLIC WAS REQUIRED TO SUBMIT PROOF OF COMPLIANCE WITH THE ORDERS WITHIN 30 DAYS OF THE EXECUTION OF THE ORDER.

Disclosure 10 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	SYMETRA LIFE INSURANCE COMPANY OFFERED A STOP LOSS POLICY TO 2 TRUSTS WITHOUT FILING INFORMATION ABOUT THE TRUSTS WITH THE



DIRECTOR PURSUANT TO ORS 743.526(3) AND THEREFORE THE DIRECTOR DID NOT DETERMINE THAT THE TRUSTS SATISFIED THE APPLICABLE REQUIREMENTS.

Initiated By: STATE OF OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES INSURANCE DIVISION

Date Initiated: 07/11/2011

Docket/Case Number: CASE NO. INS 11-03-015

Principal Product Type: Insurance

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: STIPULATION AND FINAL ORDER

Resolution: Stipulation and Consent

Resolution Date: 07/11/2011

Sanctions Ordered: Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: TOTAL AMOUNT PAID WAS A CIVIL PENALTY IN THE AMOUNT OF \$10,000.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID 06/20/2011, NO AMOUNT OF THE PENALTY WAS WAIVED.

Firm Statement AS A RESULT OF AN ADMINISTRATIVE PROCEEDING BY THE STATE OF OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES INSURANCE DIVISION, SYMETRA LIFE INSURANCE COMPANY ("SLIC") OFFERED A STOP LOSS POLICY TO 2 TRUSTS WITHOUT FILING INFORMATION ABOUT THE TRUSTS WITH THE DIRECTOR PURSUANT TO ORS 743.526(3) AND THEREFORE THE DIRECTOR DID NOT DETERMINE THAT THE TRUSTS SATISFIED THE APPLICABLE REQUIREMENTS. PURSUANT TO A STIPULATION AND FINAL ORDER, SLIC PAID A CIVIL PENALTY IN THE AMOUNT OF \$10,000.00.

Disclosure 11 of 15

Reporting Source: Firm

Affiliate: SYMETRA LIFE INSURANCE COMPANY

Current Status: Final



Allegations:	SYMETRA LIFE INSURANCE COMPANY WAS FOUND TO HAVE VIOLATED SECTION 626.8817 (3) OF THE FLORIDA INSURANCE CODE: IN CASES WHERE AN ADMINISTRATOR ADMINISTERS BENEFITS FOR MORE THAN 100 CERTIFICATE HOLDERS ON BEHALF OF AN INSURER, THE INSURER SHALL, AT LEAST SEMIANNUALLY, CONDUCT A REVIEW OF THE OPERATIONS OF THE ADMINISTRATOR.
Initiated By:	OFFICE OF INSURANCE REGULATION- STATE OF FLORIDA
Date Initiated:	03/13/2012
Docket/Case Number:	116140-11
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER
Resolution:	Consent
Resolution Date:	03/28/2012
Sanctions Ordered:	Monetary/Fine \$9,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT PAID WAS AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$6,000.00 AND ADMINISTRATIVE COSTS OF \$3,000.00. THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID 03/28/2012, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF AN INVESTIGATION BY THE FLORIDA OFFICE OF INSURANCE REGULATION, SYMETRA LIFE INSURANCE COMPANY ("SLIC") WAS FOUND TO HAVE VIOLATED SECTION 626.8817 (3) OF THE FLORIDA INSURANCE CODE: IN CASES WHERE AN ADMINISTRATOR ADMINISTERS BENEFITS FOR MORE THAN 100 CERTIFICATE HOLDERS ON BEHALF OF AN INSURER, THE INSURER SHALL, AT LEAST SEMIANNUALLY, CONDUCT A REVIEW OF THE OPERATIONS OF THE ADMINISTRATOR. PURSUANT TO A CONSENT ORDER, SLIC PAID AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$6,000.00 AND ADMINISTRATIVE COSTS OF \$3,000.00.

Disclosure 12 of 15

Reporting Source: Firm



Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE CONNECTICUT INSURANCE DEPARTMENT FOR THE TIME PERIOD OF JANUARY 1, 2010 THROUGH DECEMBER 31, 2010, IT WAS DETERMINED THAT SYMETRA LIFE INSURANCE COMPANY VIOLATED §38A-702M OF THE CONNECTICUT GENERAL STATUTES BECAUSE 4 PRODUCERS ACTED AS AGENTS WITHOUT THE REQUIRED APPOINTMENT.
Initiated By:	STATE OF CONNECTICUT INSURANCE DEPARTMENT
Date Initiated:	08/22/2012
Docket/Case Number:	MC 12-87
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	STIPULATION AND CONSENT ORDER
Resolution:	Stipulation and Consent
Resolution Date:	08/22/2012
Sanctions Ordered:	Monetary/Fine \$6,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT OF FINE WAS \$6,000.00, THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID 8/22/2012, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF A MARKET CONDUCT EXAMINATION BY THE CONNECTICUT INSURANCE DEPARTMENT FOR THE TIME PERIOD OF JANUARY 1, 2010 THROUGH DECEMBER 31, 2010, IT WAS DETERMINED THAT SYMETRA LIFE INSURANCE COMPANY("SLIC") VIOLATED §38A-702M OF THE CONNECTICUT GENERAL STATUTES BECAUSE 4 PRODUCERS ACTED AS AGENTS WITHOUT THE REQUIRED APPOINTMENT. PURSUANT TO A STIPULATION AND CONSENT ORDER, SLIC PAID A FINE IN THE AMOUNT OF \$6,000.00 AND WAS REQUIRED TO PROVIDE THE INSURANCE COMMISSIONER WITH A SUMMARY OF ACTIONS TAKEN TO COMPLY WITH THE RECOMMENDATIONS IN THE MARKET CONDUCT REPORT WITHIN 90 DAYS OF THE FINAL ORDER.



Disclosure 13 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	AS A RESULT OF SELF-REPORTING BY SYMETRA LIFE INSURANCE COMPANY ("SLIC"), THE MARYLAND INSURANCE COMMISSIONER DETERMINED THAT SLIC HAD SOLD POLICIES THAT HAD NOT BEEN APPROVED BY THE ADMINISTRATION, A VIOLATION OF §11-603(A) AND 12-203(B) OF THE INSURANCE ARTICLE.
Initiated By:	MARYLAND INSURANCE COMMISSIONER
Date Initiated:	03/23/2015
Docket/Case Number:	MIA-2015-03-026
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:	03/23/2015
Sanctions Ordered:	Monetary/Fine \$35,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT OF ADMINISTRATIVE PENALTY WAS \$35,000.00, THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID 3/23/2015, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF SELF-REPORTING BY SYMETRA LIFE INSURANCE COMPANY ("SLIC"), THE MARYLAND INSURANCE COMMISSIONER DETERMINED THAT SLIC HAD SOLD POLICIES THAT HAD NOT BEEN APPROVED BY THE ADMINISTRATION, A VIOLATION OF §11-603(A) AND 12-203(B) OF THE INSURANCE ARTICLE. PURSUANT TO A CONSENT ORDER EXECUTED ON MARCH 23, 2015, SLIC PAID AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$35,000.00.



Disclosure 14 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	AS A RESULT OF A TARGET MARKET CONDUCT EXAMINATION BY THE DELAWARE DEPARTMENT OF INSURANCE OF AFFAIRS AND PRACTICES AS OF DECEMBER 31, 2016, SYMETRA LIFE INSURANCE COMPANY'S PRACTICES AND PROCEDURES DID NOT COMPLY WITH CERTAIN SECTIONS OF THE DELAWARE ADMINISTRATIVE CODE RELATED TO: REPLACEMENT OF LIFE INSURANCE, DUTIES OF INSURERS THAT USE AGENTS OR BROKERS, APPOINTMENTS, DELIVERY OF ILLUSTRATION AND RECORDS RETENTION AND FILING, APPROVAL OF FORMS.
Initiated By:	DELAWARE DEPARTMENT OF INSURANCE
Date Initiated:	08/10/2018
Docket/Case Number:	3865.2018
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:	Stipulation and Consent
Resolution Date:	08/10/2018
Sanctions Ordered:	Monetary/Fine \$13,000.00
Other Sanctions Ordered:	
Sanction Details:	TOTAL AMOUNT OF FINE \$13,000.00, THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY (THE CONTROL AFFILIATE). FINE WAS PAID AUGUST 20, 2018, NO AMOUNT OF THE PENALTY WAS WAIVED.
Firm Statement	AS A RESULT OF A TARGET MARKET CONDUCT EXAMINATION BY THE DELAWARE DEPARTMENT OF INSURANCE OF AFFAIRS AND PRACTICES AS OF DECEMBER 31, 2016, SYMETRA LIFE INSURANCE COMPANY'S (SLIC) PRACTICES AND PROCEDURES DID NOT COMPLY WITH CERTAIN SECTIONS OF THE DELAWARE ADMINISTRATIVE CODE RELATED TO: REPLACEMENT OF LIFE INSURANCE, DUTIES OF INSURERS THAT USE



AGENTS OR BROKERS, APPOINTMENTS, DELIVERY OF ILLUSTRATION AND RECORDS RETENTION AND FILING, APPROVAL OF FORMS. PURSUANT TO A STIPULATION AND CONSENT ORDER SLIC PAID THE DEPARTMENT AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF \$13,000.00.

Disclosure 15 of 15

Reporting Source:	Firm
Affiliate:	SYMETRA LIFE INSURANCE COMPANY
Current Status:	Final
Allegations:	SYMETRA LIFE INSURANCE COMPANY (SLIC) RECEIVED A NOTIFICATION OF INVESTIGATION ON 9/07/18 FROM THE WASHINGTON STATE OFFICE OF THE INSURANCE COMMISSIONER (OIC) AS A RESULT OF THE OIC'S RECEIPT OF A FORMAL COMPLAINT ALLEGING THAT SLIC PROVIDED EXPERIENCE REFUNDS TO STOP LOSS INSURANCE POLICYHOLDERS IN VIOLATION OF WASHINGTON INSURANCE LAW.
Initiated By:	STATE OF WASHINGTON OFFICE OF THE INSURANCE COMMISSIONER
Date Initiated:	08/30/2019
Docket/Case Number:	ORDER NO. 19-0320
Principal Product Type:	Insurance
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER LEVYING A FINE
Resolution:	Order
Resolution Date:	08/30/2019
Sanctions Ordered:	Monetary/Fine \$80,000.00
Other Sanctions Ordered:	
Sanction Details:	FINE OF \$80,000.00, THE ENTIRE AMOUNT WAS LEVIED AGAINST SYMETRA LIFE INSURANCE COMPANY AND WAS PAID ON 08/28/2019. NO PORTION OF THE PENALTY WAS WAIVED.
Firm Statement	SYMETRA LIFE INSURANCE COMPANY (SLIC) RECEIVED A NOTIFICATION OF INVESTIGATION ON 9/07/18 FROM THE WASHINGTON STATE OFFICE OF THE INSURANCE COMMISSIONER (OIC) AS A RESULT OF THE OIC'S RECEIPT OF A FORMAL COMPLAINT ALLEGING THAT SLIC PROVIDED



EXPERIENCE REFUNDS TO STOP LOSS INSURANCE POLICYHOLDERS IN VIOLATION OF WASHINGTON INSURANCE LAW. SLIC RESPONDED, DISPUTING THE ALLEGATIONS AND PROVIDING REQUESTED INFORMATION. BY LETTER DATED 7/22/2019, THE OIC PROPOSED RESOLVING THIS MATTER WITH A CONSENT ORDER AND PAYMENT OF A FINE. AFTER SEVERAL DISCUSSIONS, SLIC AND THE OIC ENTERED INTO A CONSENT ORDER DATED AUGUST 30, 2019, RESOLVING THIS MATTER AND SLIC PAID AN \$80,000 FINE.

End of Report



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