

# VALIC RETIREMENT SERVICES CO

## **FORM TA-1/A** (Amended Transfer Agent Registration)

Filed 10/03/24

Address	2929 ALLEN PARKWAY L4-01 HOUSTON, TX, 77019
Telephone	713-831-3150
CIK	0001202048
Fiscal Year	12/31

Form TA-1 Filer Information	UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549	OMB APPROVAL
FORM TA-1/A	FORM TA-1/A	OMB Number: 3235-0084 Estimated average burden hours per response: 1.5

TA-1/A : Filer Information

1(a). Filer CIK:	0001202048
1(b). Filer CCC:	*****
1(c). Is this a LIVE or TEST submission?	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Test
1(d). Would you like a Return Copy?	<input checked="" type="checkbox"/> Yes
1(e). Is this filing an amendment to a previous filing?	<input checked="" type="checkbox"/> Yes
1(e)(i). File Number	084-06057

Submission Contact Information

The registrant may provide a single e-mail address for contact purposes.

1(f)(i). Contact Name:	
1(f)(ii). Contact Phone Number:	
1(f)(iii). Contact E-Mail Address:	

Notification Information

The registrant may provide additional e-mail addresses for those persons the filer would like to receive notification e-mails regarding the filing.

1(g). Notification E-mail Address:
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TA-1/A : Registrant Information

2. Appropriate regulatory agency (check one):	<input checked="" type="checkbox"/> Securities and Exchange Commission <input type="checkbox"/> Federal Deposit Insurance Corporation <input type="checkbox"/> Comptroller of the Currency
3(a). Full Name of Registrant:	VALIC RETIREMENT SERVICES CO
3(a)(i). Previous name, if being amended:	AIG RETIREMENT SERVICES CO
3(b). Financial Industry Number (FINS) number:	502575
3(c). Address of principal office where transfer agent activities are, or will be, performed:	
3(c)(i). Address 1	2929 Allen Parkway
3(c)(ii). Address 2	
3(c)(iii). City	Houston

<b>3(c)(iv).</b> State or Country	<input type="text" value="TEXAS"/>
<b>3(c)(v).</b> Postal Code	<input type="text" value="77019"/>
<b>3(d).</b> Is Mailing address different from response to Question 3c? If "yes" provide address(es):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>3(e).</b> Telephone Number (Include Area Code)	<input type="text" value="713-831-3150"/>
<b>4.</b> Does Registrant conduct, or will it conduct, transfer agent activities at any location other than that given in Questions 3(c) above? If "Yes" provide address (es):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>5.</b> Does registrant act, or will it act, as a transfer agent solely for its own securities, and/or securities of an affiliate(s)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>6.</b> Has registrant, as a named transfer agent, engaged, or will it engage, a service company to perform any transfer agent functions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>7.</b> Has registrant been engaged, or will it be engaged as a service company by a named transfer agent to perform transfer agent functions?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

TA-1/A : Independent, Non-Issuer Registrant Information

Completion of Question 8 on this form is required by all independent, non-issuer registrants whose appropriate regulatory authority is the Securities and Exchange Commission. Those registrants who are not required to complete Question 8 should select "Not Applicable".

<b>8.</b> Is registrant a:	<input type="text" value="Corporation"/>
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Section for Initial Registration and for Amendments Reporting Additional Persons.

corporation or partner information Related to item 8 Record: 1

<b>8(a)(i).</b> Full Name	<input type="text" value="The Variable Annuity Life Insurance Company (VALIC)"/>
<b>8(a)(ii).</b> Relationship Start Date	<input type="text" value="11/18/1996"/>
<b>8(a)(iii).</b> Title or Status	<input type="text" value="Owner"/>
<b>8(a)(iv).</b> Ownership Code	<input type="text" value="E"/>
<b>8(a)(v).</b> Control Person	<input checked="" type="checkbox"/> Yes
<b>8(a)(vi).</b> Relationship End Date	<input type="text"/>

corporation or partner information Related to item 8 Record: 2

<b>8(a)(i).</b> Full Name	<input type="text" value="Todd McGrath"/>
<b>8(a)(ii).</b> Relationship Start Date	<input type="text" value="06/17/2021"/>
<b>8(a)(iii).</b> Title or Status	<input type="text" value="President"/>
<b>8(a)(iv).</b> Ownership Code	<input type="text" value="NA"/>
<b>8(a)(v).</b> Control Person	<input checked="" type="checkbox"/> Yes
	<input type="text"/>

**8(a)(vi).** Relationship End Date

corporation or partner information Related to item 8 Record: 3

**8(a)(i).** Full Name

[Kara R. Boling](#)

**8(a)(ii).** Relationship Start Date

[06/28/2016](#)

**8(a)(iii).** Title or Status

[Executive Vice President & COO](#)

**8(a)(iv).** Ownership Code

[NA](#)

**8(a)(v).** Control Person

☒ Yes

**8(a)(vi).** Relationship End Date

corporation or partner information Related to item 8 Record: 4

**8(a)(i).** Full Name

[Barbara Rayll](#)

**8(a)(ii).** Relationship Start Date

[11/30/2023](#)

**8(a)(iii).** Title or Status

[Vice President](#)

**8(a)(iv).** Ownership Code

[NA](#)

**8(a)(v).** Control Person

☐ Yes

**8(a)(vi).** Relationship End Date

**9.** Does any person or entity not named in the answer to Question 8:

**9(a).** directly or indirectly, through agreement or otherwise exercise or have the power to exercise control over the management or policies of applicant, or;....

☒ Yes ☐ No

Entity information Related to item 9(a) Record: 1

**9(a)(i).** Exact name of each person or entity:

[The Variable Annuity Life Insurance Company, AGC Life Insurance Company, AIG Life Holdings, Inc., Corebridge Financial, Inc., and American Intl Group.](#)

**9(a)(ii).** Description of the Agreement or other basis:

[American International Group, Inc.'s \("AIG"\) share ownership of Corebridge Financial, Inc. \("Corebridge Financial"\), the publicly-traded parent company of VALIC Retirement Services Company, and the rights granted to AIG by Corebridge Financial as part of a separation agreement between AIG and Corebridge Financial, provide AIG with control over Corebridge Financial's corporate and business activities.](#)

**9(b).** wholly or partially finance the business of the applicant, directly or indirectly, in any manner other than by a public offering of securities made pursuant to the Securities Act of 1933 or by credit extended in the ordinary course of business by suppliers, banks and others?.....

☐ Yes ☒ No

## TA-1/A : 10. Applicant and Control Affiliate Disciplinary History

The following definitions apply for purposes of answering this Question 10

Control Affiliate - An individual or firm that directly or indirectly controls, is under common control with, or is controlled by applicant. Included are any employees identified in 8(a), 8(b), 8(c) of this form as exercising control. Excluded are any employees who perform solely clerical, administrative support of similar functions, or who, regardless of title, perform no executive duties or have no senior policy making authority.

Investment or investment related	- Pertaining to securities, commodities, banking, insurance, or real estate (including, but not limited to, acting as or being associated with a broker dealer, investment company, investment adviser, futures sponsor, bank, or savings and loan association).
Involved	- Doing an act of aiding, abetting, counseling, commanding, inducing, conspiring with or failing reasonably to supervise another in doing an act.

**10(a).** In the past ten years has the applicant or a control affiliate been convicted of or plead guilty or nolo contendere ("no contest") to:

**10(a)(1).** a felony or misdemeanor involving: investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, or bribery, forgery, counterfeiting, or extortion? ☐ Yes ☒ No

**10(a)(2).** any other felony? ☐ Yes ☒ No

**10(b).** Has any court in the past ten years:

**10(b)(1).** enjoined the applicant or a control affiliate in connection with any investment-related activity? ☐ Yes ☒ No

**10(b)(2).** found that the applicant or control affiliate was involved in a violation of investment-related statutes or regulations? ☐ Yes ☒ No

**10 (c).** Has the U.S. Securities and Exchange Commission or the Commodity Futures Trading Commission ever:

**10(c)(1).** found the applicant or control affiliate to have made a false statement or omission? ☒ Yes ☐ No

Entity information Related to item 10(c)(1) Record: 1

<b>10(c)(1)(i).</b> The individuals named in the Action	<a href="#">American International Group, Inc.</a>
<b>10(c)(1)(ii).</b> Title of Action	<a href="#">Injunction</a>
<b>10(c)(1)(iii).</b> Date of Action	<a href="#">02/06/2006</a>
<b>10(c)(1)(iv).</b> The Court or body taking the Action and its location	<a href="#">Securities and Exchange Commission</a>
<b>10(c)(1)(v).</b> Description of the Action	<a href="#">THE SEC COMPLAINT ALLEGED THAT FROM 2000 UNTIL 2005, AIG MATERIALLY FALSIFIED ITS FINANCIAL STATEMENTS IN ORDER TO STRENGTHEN THE APPEARANCE OF ITS FINANCIAL RESULTS TO ANALYSTS AND INVESTORS. IN SO DOING, THE SEC ALLEGED THAT AIG HAD VIOLATED SECTION 17(A) OF THE SECURITIES ACT OF 1933 AND SECTIONS 10(B), 13(A), 13(B)(2) AND 13(B)(5) AND RULES 10B-5, 12B-20, 13A-1, 13A-13 AND 13B2-1 OF THE EXCHANGE ACT OF 1934.</a>
<b>10(c)(1)(vi).</b> The disposition of the proceeding	<a href="#">Settled 2/17/2006</a>

Entity information Related to item 10(c)(1) Record: 2

<b>10(c)(1)(i).</b> The individuals named in the Action	<a href="#">VALIC Financial Advisors, Inc. (VFA)</a>
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<b>10(c)(1)(ii).</b> Title of Action	In the Matter of VALIC Financial Advisors, Inc. SEC File No. 3-19894
<b>10(c)(1)(iii).</b> Date of Action	07/28/2020
<b>10(c)(1)(iv).</b> The Court or body taking the Action and its location	Securities and Exchange Commission
<b>10(c)(1)(v).</b> Description of the Action	On July 28, 2020, the United States Securities and Exchange Commission ("SEC") issued an administrative order against VALIC Financial Advisors, Inc. ("VFA" or the "Firm") finding that the Firm failed to disclose to certain Florida teachers that the Firm's parent company, VALIC, provided cash and other financial benefits to a for-profit company owned by Florida K-12 teachers' unions in exchange for referring teachers to products and services offered by VALIC and the Firm, in violation of Sections 206(2) and 206(4) of the Advisers Act and Advisers Act Rule 206(4)-3 thereunder. The SEC also found that VFA did not adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder, in violation of Section 206(4) of the Advisers Act and Rule 206(4)-7 thereunder. VFA neither admitted nor denied the SEC's findings.
<b>10(c)(1)(vi).</b> The disposition of the proceeding	Solely for the purpose of settling the proceeding, VFA consented to a cease-and-desist order, a censure, and to pay a civil monetary penalty of \$20 million, which was paid on July 31, 2020. VFA agreed to comply with certain undertakings as well.

Entity information Related to item 10(c)(1) Record: 3

<b>10(c)(1)(i).</b> The individuals named in the Action	VALIC Financial Advisors, Inc. (VFA)
<b>10(c)(1)(ii).</b> Title of Action	In the Matter of VALIC Financial Advisors, Inc. SEC File No. 3-19895
<b>10(c)(1)(iii).</b> Date of Action	07/28/2020
<b>10(c)(1)(iv).</b> The Court or body taking the Action and its location	Securities and Exchange Commission
<b>10(c)(1)(v).</b> Description of the Action	On July 28, 2020, the United States Securities and Exchange Commission ("SEC") issued an administrative order against VALIC Financial Advisors, Inc. ("VFA") regarding certain VFA mutual fund and mutual fund share class selection practices. Specifically, the SEC found that the Firm had not appropriately disclosed certain conflicts of interest due to its receipt of revenue sharing, avoidance of transaction fees, and receipt of 12b-1 fees, in violation of Section 206(2) of the Advisers Act. The SEC also found that VFA did not adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder in connection with its mutual fund share class selection practices, in violation of Section 206(4) of the Advisers Act of 1940 and Rule 206(4)-7 thereunder. VFA neither admitted nor denied the SEC's findings.
<b>10(c)(1)(vi).</b> The disposition of the proceeding	Solely for the purpose of settling the proceeding, VFA consented to a cease-and-desist order, a censure, and disgorgement of \$13,232,681, prejudgment interest of \$2,211,072, and a \$4.5 million civil penalty, paid on 8/7/2020, and certain undertakings.
<b>10(c)(2).</b> found the applicant or control affiliate to have been involved in a violation of its regulation or statutes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Entity information Related to item 10(c)(2) Record: 1

<b>10(c)(2)(i).</b> The individuals named in the Action	American International Group, Inc.
<b>10(c)(2)(ii).</b> Title of Action	Docket SDNY - Case No. 06 CIV 1000
<b>10(c)(2)(iii).</b> Date of Action	02/09/2006
<b>10(c)(2)(iv).</b> The Court or body taking the	Securities and Exchange Commission

**Action and its location****10(c)(2)(v). Description of the Action**

The SEC Complaint alleged that from 2000 until 2005, AIG materially falsified its financial statements in order to strengthen the appearance of its financial results to analysts and investors. In so doing, the SEC Alleged that AIG had violated Section 17(A) of The Securities Act of 1933 and Sections 10(B), 13(A), 13(B)(2) and 13(B)(5) and Rules 10B-5, 12B-20, 13A-1, 13A-13 and 13B2-1 of the Exchange Act.

**10(c)(2)(vi). The disposition of the proceeding**

Settled 2/17/2006

Entity information Related to item 10(c)(2) Record: 2

**10(c)(2)(i). The individuals named in the Action**

VALIC Financial Advisors, Inc. (VFA)

**10(c)(2)(ii). Title of Action**

In the Matter of VALIC Financial Advisors, Inc. SEC File No. 3-19894

**10(c)(2)(iii). Date of Action**

07/28/2020

**10(c)(2)(iv). The Court or body taking the Action and its location**

Securities and Exchange Commission

**10(c)(2)(v). Description of the Action**

On July 28, 2020, the United States Securities and Exchange Commission ("SEC") issued an administrative order against VALIC Financial Advisors, Inc. ("VFA" or the "Firm") finding that the Firm failed to disclose to certain Florida teachers that the Firm's parent company, VALIC, provided cash and other financial benefits to a for-profit company owned by Florida K-12 teachers' unions in exchange for referring teachers to products and services offered by VALIC and the Firm, in violation of Sections 206(2) and 206(4) of the Advisers Act and Advisers Act Rule 206(4)-3 thereunder. The SEC also found that VFA did not adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder, in violation of Section 206(4) of the Advisers Act and Rule 206(4)-7 thereunder. VFA neither admitted nor denied the SEC's findings.

**10(c)(2)(vi). The disposition of the proceeding**

Solely for the purpose of settling the proceeding, VFA consented to a cease-and-desist order, a censure, and to pay a civil monetary penalty of \$20 million, which was paid on July 30, 2020. VFA agreed to comply with certain undertakings as well.

Entity information Related to item 10(c)(2) Record: 3

**10(c)(2)(i). The individuals named in the Action**

VALIC Financial Advisors, Inc. (VFA)

**10(c)(2)(ii). Title of Action**

In the Matter of VALIC Financial Advisors, Inc. SEC File No. 3-19895

**10(c)(2)(iii). Date of Action**

07/28/2020

**10(c)(2)(iv). The Court or body taking the Action and its location**

Securities and Exchange Commission

**10(c)(2)(v). Description of the Action**

On July 28, 2020, the United States Securities and Exchange Commission ("SEC") issued an administrative order against VALIC Financial Advisors, Inc. ("VFA") regarding certain VFA mutual fund and mutual fund share class selection practices. Specifically, the SEC found that the Firm had not appropriately disclosed certain conflicts of interest due to its receipt of revenue sharing, avoidance of transaction fees, and receipt of 12b-1 fees, in violation of Section 206(2) of the Advisers Act. The SEC also found that VFA did not adopt and implement written compliance policies and procedures reasonably designed to prevent violations of the Advisers Act and the rules thereunder in connection with its mutual fund share class selection practices, in violation of Section 206(4) of the Advisers Act of 1940 and Rule 206(4)-7 thereunder. VFA neither admitted nor denied the SEC's findings.

**10(c)(2)(vi). The disposition of the proceeding**

Solely for the purpose of settling the proceeding, VFA consented to a cease-and-desist order, a censure, and disgorgement of \$13,232,681, prejudgment interest of \$2,211,072, and a \$4.5 million civil penalty, paid on 8/7/2020, and certain undertakings.

**10(c)(3).** found the applicant or control affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked or restricted?

☐ Yes ☒ No

**10(c)(4).** entered an order denying, suspending or revoking the applicant's or control affiliate's registration or otherwise disciplined it by restricting its activities?

☐ Yes ☒ No

**10(d).** Has any other Federal regulatory agency or any state regulatory agency :

**10(d)(1).** ever found the applicant or control affiliate to have made a false statement or omission or to have been dishonest, unfair, or unethical?

☒ Yes ☐ No

Entity information Related to item 10(d)(1) Record: 1

**10(d)(1)(i).** The individuals named in the Action

The VARIABLE ANNUITY LIFE INSURANCE COMPANY (VALIC)

**10(d)(1)(ii).** Title of Action

Docket/Case Number: 08-1728-9

**10(d)(1)(iii).** Date of Action

08/06/2015

**10(d)(1)(iv).** The Court or body taking the Action and its location

West Virginia Securities Commission

**10(d)(1)(v).** Description of the Action

The State alleged in twenty-four separate summary orders 1) VALIC acted as an investment adviser without proper registration, 2) advertisement violation, 3) VALIC and its agent defrauded investors by misleading them, misrepresenting material facts, and implying the were representatives of the school board or the State, 4) statements/omissions were misleading and constituted a scheme to defraud WV residents, and 5) failure of VALIC's agent to disclose to his client that was employed and controlled by VALIC.

**10(d)(1)(vi).** The disposition of the proceeding

Vacated 5/3/2019.

Entity information Related to item 10(d)(1) Record: 2

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

Docket/Case Number: 16-0572-DEN

**10(d)(1)(iii).** Date of Action

06/14/2016

**10(d)(1)(iv).** The Court or body taking the Action and its location

State of Oklahoma Insurance Department

**10(d)(1)(v).** Description of the Action

Due to an administrative error, VFA omitted certain FINRA regulatory actions on its insurance agency application.

**10(d)(1)(vi).** The disposition of the proceeding

VFA agreed to settlement and paid \$300 administrative fine.

Entity information Related to item 10(d)(1) Record: 3

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)



**10(d)(1)(ii).** Title of Action

Docket/Case Number: 16-0572-DEN

**10(d)(1)(iii).** Date of Action

06/24/2016

**10(d)(1)(iv).** The Court or body taking the Action and its location

State of Oklahoma Insurance Department

**10(d)(1)(v).** Description of the Action

VFA filed an administrative agency application on behalf of VALIC Financial Advisors, Inc., in the the State of Oklahoma. Due to an administrative error, the application omitted certain FINRA Regulatory Actions. VFS amended its application. The State issued an administrative fine against VFA for \$300 for omitting the regulatory event in its application.

**10(d)(1)(vi).** The disposition of the proceeding

VFA agreed to settlement and paid the \$300 administrative fee.

Entity information Related to item 10(d)(1) Record: 4

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

Docket/Case Number: 100130340

**10(d)(1)(iii).** Date of Action

10/07/2016

**10(d)(1)(iv).** The Court or body taking the Action and its location

Alaska Division of Insurance

**10(d)(1)(v).** Description of the Action

Alaska issued an administrative fine against VFA in the amount of \$100 for failing to timely report the fine issued by the State of Oklahoma.

**10(d)(1)(vi).** The disposition of the proceeding

VFA settled the matter and paid the fine.

Entity information Related to item 10(d)(1) Record: 5

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

Docket/Case Number; 11/7/2016

**10(d)(1)(iii).** Date of Action

11/07/2016

**10(d)(1)(iv).** The Court or body taking the Action and its location

Louisiana Department of Insurance

**10(d)(1)(v).** Description of the Action

Louisiana issued an administrative fine against VFA for \$500 for omitting prior regulatory events in the initial application and failing to timely report the fine issued by the State of Oklahoma.

**10(d)(1)(vi).** The disposition of the proceeding

VFA settled the matter and paid the \$500 fine.

Entity information Related to item 10(d)(1) Record: 6

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

12.04 - 149432J

**10(d)(1)(iii).** Date of Action

12/05/2017

**10(d)(1)(iv).** The Court or body taking the Action and its location

Tennessee Department of Insurance

**10(d)(1)(v).** Description of the Action

On 04/06/2016, VALIC Financial Advisors, Inc. (VFA) filed an insurance agency application in the state of Tennessee. Due to an administrative error, the application failed to include certain VFA Regulatory Disclosures. Upon recognizing the error, VFA amended its insurance agency application on 9/30/2017. On 1/31/2018, the State of Tennessee Insurance Division issued a civil penalty against VFA in the amount of \$500.00 for failing to include the regulatory disclosures in the initial application.

**10(d)(1)(vi).** The disposition of the proceeding

VFA signed the agreed final order and paid the fine totaling \$500.00.

Entity information Related to item 10(d)(1) Record: 7

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

State of Ohio Department of Insurance

**10(d)(1)(iii).** Date of Action

05/23/2017

**10(d)(1)(iv).** The Court or body taking the Action and its location

State of Ohio Department of Insurance

**10(d)(1)(v).** Description of the Action

On 04/06/2016, VALIC Financial Advisors, Inc. (VFA) filed an insurance agency application on the behalf in the state of Ohio. Due to an administrative error, the application failed to include certain VFA Regulatory Disclosures. Upon recognizing the error, VFA amended its insurance agency application on September 30. On May 23, the Ohio Department of Insurance issued an administrative fine against VFA in the amount of \$500.00 for inadvertently omitting regulatory disclosure in the initial application. The administrative fine invoice was received by VFA on June 26, 2017, at which time it was promptly paid.

**10(d)(1)(vi).** The disposition of the proceeding

VFA paid the \$500 fine issued by the state.

Entity information Related to item 10(d)(1) Record: 8

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

Docket/Case Number: AGN266722

**10(d)(1)(iii).** Date of Action

01/23/2017

**10(d)(1)(iv).** The Court or body taking the Action and its location

State of Maine Bureau of Insurance

**10(d)(1)(v).** Description of the Action

On 04/06/2016, VALIC Financial Advisors, Inc. (VFA) filed an insurance agency application on the behalf in the state of Maine. Due to an administrative error, the application failed to include certain VFA Regulatory Disclosures. Upon recognizing the error, VFA amended its insurance agency application on September 30. On January 23, the State of Maine Bureau of Insurance issued an administrative fine against VFA in the amount of \$50.00 for failing to include the regulatory disclosures in the initial application. The correspondence was not received by VFA until March 22, at which time payment of the fee was arranged.

**10(d)(1)(vi).** The disposition of the proceeding

VFA paid the \$50 fine issued by the state on 4/7/2017.

Entity information Related to item 10(d)(1) Record: 9

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

Docket/Case Number: 68901

**10(d)(1)(iii).** Date of Action

11/29/2016

**10(d)(1)(iv).** The Court or body taking the Action and its location

Virginia Bureau of Insurance

**10(d)(1)(v).** Description of the Action

On 04/06/2016, VALIC Financial Advisors, Inc. (VFA) filed an insurance agency application in the state of Virginia. Due to an administrative error, the application omitted certain FINRA Regulatory actions. VFA amended its application on September 30. On November 29, the State issued an administrative fine against VFA in the amount of \$500.00 for omitting the regulatory events in the initial application and failing to timely report the fine issued by the State of Oklahoma.

**10(d)(1)(vi).** The disposition of the proceeding

VFA settled the matter and paid the \$500 fine.

Entity information Related to item 10(d)(1) Record: 10

**10(d)(1)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(d)(1)(ii).** Title of Action

Docket/Case Number: 1000474400

**10(d)(1)(iii).** Date of Action

12/13/2016

**10(d)(1)(iv).** The Court or body taking the Action and its location

North Carolina Department of Insurance

**10(d)(1)(v).** Description of the Action

On 04/06/2016, VALIC Financial Advisors, Inc. (VFA) filed an insurance agency application in the state of North Carolina. Due to an administrative error, the application omitted certain FINRA Regulatory events. VFA amended its application on September 30. On December 16, the State issued an administrative fine against VFA in the amount of \$250.00 for omitting the regulatory events in the initial application and failing to timely report the fine issued by the State of Oklahoma.

**10(d)(1)(vi).** The disposition of the proceeding

VFA settled the matter and paid the \$250 fine.

**10(d)(2).** ever found the applicant or control affiliate to have been involved in a violation of investment-related regulations or statutes?

☒ Yes ☐ No

Entity information Related to item 10(d)(2) Record: 1

**10(d)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc.

**10(d)(2)(ii).** Title of Action

SEU-2018-001

**10(d)(2)(iii).** Date of Action

05/30/2019

**10(d)(2)(iv).** The Court or body taking the Action and its location

Hawaii Department of Commerce and Consumer Affairs

**10(d)(2)(v).** Description of the Action

Hawaii alleged that the firm failed to supervise a registered representative who had submitted a transactions without proper customer authorization.

**10(d)(2)(vi).** The disposition of the proceeding

Monetary/Fine \$10,000. Cease and Desist/Injunction

Entity information Related to item 10(d)(2) Record: 2

**10(d)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc.

**10(d)(2)(ii).** Title of Action

Docket/Case Number: 20-0168

**10(d)(2)(iii).** Date of Action

02/25/2020

**10(d)(2)(iv).** The Court or body taking the Action and its location

State of Washington Office of the Insurance Commissioner

**10(d)(2)(v).** Description of the Action

Due to an administrative error, VFA's Washington business entity license listed an invalid email address. The state used that contact information to send correspondence which ultimately was not received by VFA. The state issued an administrative fine against VFA in the amount of \$250 for failure to have at least one licensed affiliate and failure to respond to those inquiries.

**10(d)(2)(vi).** The disposition of the proceeding

VFA signed the agreed final order and paid the fine totaling \$250.00.

Entity information Related to item 10(d)(2) Record: 3

**10(d)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc.

**10(d)(2)(ii).** Title of Action

Delaware Department of Insurance

**10(d)(2)(iii).** Date of Action

05/06/2021

**10(d)(2)(iv).** The Court or body taking the Action and its location

Delaware Department of Insurance

**10(d)(2)(v).** Description of the Action

On June 23, 2021, the Delaware Department of Insurance signed a consent order fining VFA \$500 for failing to timely report VFA's January 8, 2021 Letter of Acceptance, Waiver, and Consent with FINRA.

**10(d)(2)(vi).** The disposition of the proceeding

VFA signed the agreed final order and paid the fine totaling \$500.00.

Entity information Related to item 10(d)(2) Record: 4

**10(d)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc.

**10(d)(2)(ii).** Title of Action

Louisiana Department of Insurance

**10(d)(2)(iii).** Date of Action

06/14/2021

**10(d)(2)(iv).** The Court or body taking the Action and its location

Louisiana Department of Insurance

**10(d)(2)(v).** Description of the Action

On July 14, 2021, the Louisiana Department of Insurance signed a consent order fining VFA \$500 for failing to timely report VFA's January 8, 2021 Letter of Acceptance, Waiver, and Consent with FINRA.

**10(d)(2)(vi).** The disposition of the proceeding

VFA signed the agreed final order and paid the fine totaling \$500.00.

Entity information Related to item 10(d)(2) Record: 5

**10(d)(2)(i).** The individuals named in the Action

The Variable Annuity Life Insurance Company

**10(d)(2)(ii).** Title of Action

Docket/Case Number: 24-012-I

**10(d)(2)(iii).** Date of Action

08/05/2024

**10(d)(2)(iv).** The Court or body taking the Action and its location

State of Vermont Department of Financial Regulation

**10(d)(2)(v).** Description of the Action

On September 5, 2024, The Variable Annuity Life Insurance Company paid a \$16,000 voluntary forfeiture to the State of Vermont Department of Financial Regulation to resolve the Department's finding of a violation of V.S.A. Section 2435(b)(3) for failing to notify

the Department of a data breach for a Vermont consumer within 14 days of the date the Company discovered the breach or the date the Company provides notice to consumers, whichever is earlier.

Consent order. Administrative Penalty of \$16,000.

☐ Yes ☒ No

☒ Yes ☐ No

**10(d)(2)(vi).** The disposition of the proceeding

**10(d)(3).** ever found the applicant or control affiliate to have been a cause of an investment-related business having its authorization to do business Denied, suspended, revoked or restricted?

**10(d)(4).** in the past ten years entered an order against the applicant or control affiliate in connection with investment-related activity?

Entity information Related to item 10(d)(4) Record: 1

**10(d)(4)(i).** The individuals named in the Action

American General Life Insurance Company

**10(d)(4)(ii).** Title of Action

Docket/Case Number: 10-076-S

**10(d)(4)(iii).** Date of Action

09/20/2010

**10(d)(4)(iv).** The Court or body taking the Action and its location

Vermont Dept of Banking, Insurance, Securities and Healthcare Administration ("B

**10(d)(4)(v).** Description of the Action

SunAmerica Annuity and Life Assurance Company ("SALAC") merged into American General Life Insurance Company ("AGLIC") in December 2012. AGLIC is a related person of Varagon Capital Partners, L.P. BISHCA alleged that SALAC violated the Vermont Uniform Securities Act by (1) using a prospectus that was ambiguous in describing its automatic asset re-balance program feature applicable to certain variable annuities, and (2) not re-balancing certain sub-accounts within the annuities to return to allocations given in the account owners' last trade instructions.

**10(d)(4)(vi).** The disposition of the proceeding

Stipulation and Consent. Sanction ordered in the amount of \$100,000.

Entity information Related to item 10(d)(4) Record: 2

**10(d)(4)(i).** The individuals named in the Action

American General Life Insurance Company American International Group, Inc.

**10(d)(4)(ii).** Title of Action

In the Matter of, American General Life Insurance Company American International

**10(d)(4)(iii).** Date of Action

01/28/2021

**10(d)(4)(iv).** The Court or body taking the Action and its location

New York State Department of Financial Services

**10(d)(4)(v).** Description of the Action

American International Group, Inc. ("AIG") and AGL entered into a consent order with New York State Department of Financial Services finding that AGL had conducted an insurance business in New York without a New York license in connection with its Pension Risk Transfer ("PRT") business, in violation of insurance law section 1102(A).

**10(d)(4)(vi).** The disposition of the proceeding

Order made findings only against AGL. AGL paid a \$12,000,000 civil penalty on 02/05/2021. Pursuant to the order, AGL will also take agreed upon actions with respect to NY-based participants in legacy and future PRT transactions.

Entity information Related to item 10(d)(4) Record: 3

**10(d)(4)(i).** The individuals named in the Action

American General Life Insurance Company

<b>10(d)(4)(ii).</b> Title of Action	<a href="#">In the Matter of American General Life Insurance Company, Docket No. 4516</a>
<b>10(d)(4)(iii).</b> Date of Action	<a href="#">08/12/2021</a>
<b>10(d)(4)(iv).</b> The Court or body taking the Action and its location	<a href="#">State of Delaware Department of Insurance</a>
<b>10(d)(4)(v).</b> Description of the Action	<a href="#">On August 12, 2021, American General Life Insurance Company paid a \$106,000 administrative fine to the Delaware Department of Insurance to resolve alleged violations arising out of the state's routine market conduct examination of the company's individual life and individual annuity business.</a>
<b>10(d)(4)(vi).</b> The disposition of the proceeding	<a href="#">Stipulation and Consent. Administrative Penalty in the amount of \$106,000.</a>

Entity information Related to item 10(d)(4) Record: 4

<b>10(d)(4)(i).</b> The individuals named in the Action	<a href="#">The Variable Annuity Life Insurance Company</a>
<b>10(d)(4)(ii).</b> Title of Action	<a href="#">In the Matter of The Variable Annuity Life Insurance Company, No. 2021-0089-S</a>
<b>10(d)(4)(iii).</b> Date of Action	<a href="#">09/21/2021</a>
<b>10(d)(4)(iv).</b> The Court or body taking the Action and its location	<a href="#">New York State Department of Financial Services</a>
<b>10(d)(4)(v).</b> Description of the Action	<a href="#">On September 17, 2021, VALIC paid a \$230,820 administrative fine to the NYSDFS to resolve alleged violations arising out of the state's routine market conduct examination of the company's group and individual annuity business.</a>
<b>10(d)(4)(vi).</b> The disposition of the proceeding	<a href="#">Consent Order. Administrative Penalty in the amount of \$230,820.</a>

Entity information Related to item 10(d)(4) Record: 5

<b>10(d)(4)(i).</b> The individuals named in the Action	<a href="#">American General Life Insurance Company</a>
<b>10(d)(4)(ii).</b> Title of Action	<a href="#">In the Matter of American General Life Insurance Company; No. MIA-2021-09-023</a>
<b>10(d)(4)(iii).</b> Date of Action	<a href="#">09/30/2021</a>
<b>10(d)(4)(iv).</b> The Court or body taking the Action and its location	<a href="#">Maryland Insurance Administration</a>
<b>10(d)(4)(v).</b> Description of the Action	<a href="#">On September 21, 2021, American General Life Insurance Company paid a \$32,250.00 administrative fine to the Maryland Insurance Administration to resolve alleged violations arising out of the State's routine market conduct examination of the Company's individual life insurance business, covering the time period of June 1, 2018 through January 31, 2020.</a>
<b>10(d)(4)(vi).</b> The disposition of the proceeding	<a href="#">Order. Administrative Fine in the amount of \$32,250.</a>

Entity information Related to item 10(d)(4) Record: 6

<b>10(d)(4)(i).</b> The individuals named in the Action	<a href="#">The United States Life Insurance Company in the City of New York</a>
<b>10(d)(4)(ii).</b> Title of Action	<a href="#">In the Matter of The United States Life Insurance Company, No. 2020-0232-S</a>
<b>10(d)(4)(iii).</b> Date of Action	<a href="#">12/12/2023</a>
<b>10(d)(4)(iv).</b> The Court or body taking the	<a href="#">New York State Department of Financial Services</a>

Action and its location

**10(d)(4)(v).** Description of the Action

**10(d)(4)(vi).** The disposition of the proceeding

On December 12, 2023, The United States Life Insurance Company in the City of New York ("USL") paid a \$5,146,245 civil penalty to the NYSDFS to resolve alleged violations arising out of the state's routine market conduct examination.

Consent order. Civil Penalty in the amount of \$5,146,245.

Entity information Related to item 10(d)(4) Record: 7

**10(d)(4)(i).** The individuals named in the Action

**10(d)(4)(ii).** Title of Action

**10(d)(4)(iii).** Date of Action

**10(d)(4)(iv).** The Court or body taking the Action and its location

**10(d)(4)(v).** Description of the Action

**10(d)(4)(vi).** The disposition of the proceeding

American General Life Insurance Company

In Re: American General Life Insurance Company, Docket No.: Ins. No. 24-012-EP

04/03/2024

New Hampshire Insurance Department

On March 30, 2024, American General Life Insurance Company paid an administrative penalty of \$2,500 to the New Hampshire Insurance Department to resolve alleged violations that the Company violated NH RSA 400-A:16, II by failing to respond within 10 working days to the NHID's January 10, 2024 request and by failing to respond within 10 working days to the NHID's January 30, 2024 request.

Consent Order. Administrative Fine in the amount of \$2,500.

Entity information Related to item 10(d)(4) Record: 8

**10(d)(4)(i).** The individuals named in the Action

**10(d)(4)(ii).** Title of Action

**10(d)(4)(iii).** Date of Action

**10(d)(4)(iv).** The Court or body taking the Action and its location

**10(d)(4)(v).** Description of the Action

**10(d)(4)(vi).** The disposition of the proceeding

**10(d)(5).** ever denied, suspended, or revoked applicant's or control affiliate's registration or license, or prevented it from associating with an investment-related business, or otherwise disciplined it by restricting its activities?

**10(d)(6).** ever revoked or suspended the applicant's or a control affiliate's license as an attorney or accountant?

The Variable Annuity Life Insurance Company

Docket No. 24-012-I

08/05/2024

State of Vermont Department of Financial Regulation

On September 5, 2024, The Variable Annuity Life Insurance Company paid a \$16,000 voluntary forfeiture to the State of Vermont Department of Financial Regulation to resolve the Department's finding of a violation of V.S.A. Section 2435(b)(3) for failing to notify the Department of a data breach for a Vermont consumer within 14 days of the date the Company discovered the breach or the date the Company provides notice to consumers, whichever is earlier.

Consent Order. Administrative Penalty of \$16,000.

☐ Yes ☒ No

☐ Yes ☒ No

**10(e).** Has any self-regulatory organization or commodities exchange ever:

**10(e)(1).** found the applicant or a control

☐ Yes ☒ No



affiliate to have made a false statement or omission?

**10(e)(2).** found the applicant or a control affiliate to have been involved in a violation of its rules?

☒ Yes ☐ No

Entity information Related to item 10(e)(2) Record: 1

**10(e)(2)(i).** The individuals named in the Action

AIG Capital Services, Inc.

**10(e)(2)(ii).** Title of Action

Docket/Case Number: C11000014

**10(e)(2)(iii).** Date of Action

07/07/2000

**10(e)(2)(iv).** The Court or body taking the Action and its location

National Association of Securities Dealers, Inc.

**10(e)(2)(v).** Description of the Action

The NASD alleged AIG Capital Services, Inc. ("ACS") failed to establish, maintain, and enforce written supervisory procedures reasonably designed to achieve compliance with applicable rules of NASD, to ensure (I) the timely filing and processing of registration applications; (II) the timely filing and processing of notices reporting terminations of employment; and (III) that its registered representatives fulfilled the requirements of the regulatory element of the continuing education program.

**10(e)(2)(vi).** The disposition of the proceeding

AWC/Sanctions Ordered: Censure, Monetary Fine \$75,000.00.

Entity information Related to item 10(e)(2) Record: 2

**10(e)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(e)(2)(ii).** Title of Action

Docket/Case Number: 2014042360001

**10(e)(2)(iii).** Date of Action

11/28/2016

**10(e)(2)(iv).** The Court or body taking the Action and its location

FINRA

**10(e)(2)(v).** Description of the Action

Alleged violations of NASD Rule 3010(A)(B) and FINRA Rules 2010, 2330( C), (D), and E.

**10(e)(2)(vi).** The disposition of the proceeding

AWC: Censure, Monetary Fine \$1,750,000

Entity information Related to item 10(e)(2) Record: 3

**10(e)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(e)(2)(ii).** Title of Action

Matter No. 2018060548501

**10(e)(2)(iii).** Date of Action

01/08/2021

**10(e)(2)(iv).** The Court or body taking the Action and its location

FINRA

**10(e)(2)(v).** Description of the Action

On January 8, 2021, VALIC Financial Advisors, Inc. (VFA) completed a Letter of Acceptance, Waiver and Consent (AWC) with FINRA for the purpose of settling alleged FINRA rule violations that it failed to (i) establish a reasonably designed system and written supervisory procedures to monitor rates of variable annuity exchanges and implement corrective action in the case of inappropriate exchanges, violating FINRA Rules 2330(d), 3110, and 2010; (ii) reasonably supervise recommendations involving the investment of additional funds in an existing variable annuity, violating FINRA Rules



**10(e)(2)(vi).** The disposition of the proceeding

3110 and 2010, and (iii) timely report statistical and summary information for certain customer complaints during a specified period, violating FINRA Rules 4530(d) and 2010. VFA neither admitted nor denied FINRA's findings. Solely for the purpose of settling the proceeding, VFA consented to a censure and a fine of \$350,000.

VFA neither admitted nor denied FINRA's findings. Solely for the purpose of settling the proceeding, VFA consented to a censure and a fine of \$350,000.

Entity information Related to item 10(e)(2) Record: 4

**10(e)(2)(i).** The individuals named in the Action

VALIC Financial Advisors, Inc. (VFA)

**10(e)(2)(ii).** Title of Action

Docket/Case Number: E062005009701

**10(e)(2)(iii).** Date of Action

10/31/2006

**10(e)(2)(iv).** The Court or body taking the Action and its location

FINRA

**10(e)(2)(v).** Description of the Action

NASD Rules 2110, 2830(k), 3010, 3070 - Respondent member violated the directed brokerage provisions by accepting directed brokerage commissions in exchange for providing a mutual fund company with preferred access to its sales force. The findings stated that the firm failed to report, or to timely report, disclosure events pursuant to NASD Rule 3070. The findings also stated that the firm failed to establish, maintain, and enforce a system and procedures reasonably designed to achieve compliance with Federal Securities Laws and NASD Rule 3070 Reporting Requirements.

**10(e)(2)(vi).** The disposition of the proceeding

Without admitting or denying the findings, VALIC Financial Advisors, Inc. consented to the described sanctions and to the entry of findings, therefore, the firm was censured and fined \$250,000.

**10(e)(3).** found the applicant or a control affiliate to have been the cause of an investment-related business losing its authorization to do business?

☐ Yes ☒ No

**10(e)(4).** disciplined the applicant or a control affiliate by expelling or suspending it from membership, by barring or suspending its association with other members, or by otherwise restricting its activities?

☐ Yes ☒ No

**10(f).** Has any foreign government, court, regulatory agency or exchange ever entered an order against the applicant or a control affiliate related to investments or fraud?

☐ Yes ☒ No

**10(g).** Is the applicant or a control affiliate now the subject of a proceeding that could result in a yes answer for questions 10(a) – 10(f) ?

☐ Yes ☒ No

**10(h).** Has a bonding company denied, paid out on, or revoked a bond for the applicant or a control affiliate?

☐ Yes ☒ No

**10(i).** Does the applicant or a control affiliate have any unsatisfied judgments or liens against it?

☐ Yes ☒ No

**TA-1/A : Signature**

ATTENTION: INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACT CONSTITUTE FEDERAL CRIMINAL VIOLATIONS. See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a)

SIGNATURE: The registrant submitting this form, and as required, the SEC supplement and Schedules A-D, And the executing official hereby represent that all the information contained herein is true, correct and complete.

<b>11(a).</b> Signature of Official responsible for Form:	<div>Todd McGrath</div>
<b>11(b).</b> Telephone Number:	<div>713-831-8000</div>
<b>11(c).</b> Title of Signing Officer:	<div>Chief Operating Officer</div>
<b>11(d).</b> Date Signed (Month/Day/Year):	<div>10/03/2024</div>