

UNITED STATES OF AMERICA  
before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934  
Release No. 91666 / April 23, 2021

Admin. Proc. File No. 3-19955

In the Matter of  
UNIFUNDS LIMITED

ORDER REGARDING SERVICE

The Securities and Exchange Commission (“Commission”) issued an Order Instituting Proceedings (“OIP”) on September 2, 2020, pursuant to Section 12(j) of the Securities Exchange Act of 1934, against Unifunds Limited (“Respondent”).<sup>1</sup>

On October 6, 2020, the Division of Enforcement filed the Declaration of Sandhya C. Harris (“Declaration”), which stated that, pursuant to Commission Rule of Practice 141(a)(2)(ii),<sup>2</sup> service of the OIP was made on Respondent on September 15, 2020. The Declaration stated that service of the OIP was made by mailing the OIP to an address in Bangkok, Thailand taken from Respondent’s “last filing with the Commission,” a Form 10-Q filed with the Commission on July 31, 2018. The Form 10-Q in the EDGAR database shows a Bangkok, Thailand address.<sup>3</sup> An exhibit to the Declaration shows that delivery of the OIP was attempted in Thailand on September 15, 2020.

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<sup>1</sup> *Unifunds Ltd.*, Exchange Act Release No. 89742, 2020 WL 5290836 (Sept. 2, 2020).

<sup>2</sup> 17 C.F.R. § 201.141(a)(2)(ii).

<sup>3</sup> *See* Rule of Practice 323, 17 C.F.R. § 201.323 (permitting the Commission to take official notice of, among other things, “any matter in the public official records of the Commission”).

The Declaration did not state, however, what steps the Division took to ensure that this method of serving Respondent was valid, including whether it had determined that mail is an acceptable means of service in Thailand, and the basis for that determination.<sup>4</sup>

Accordingly, it is ORDERED that by May 7, 2021, the Division of Enforcement shall file a declaration or status report providing additional information regarding its efforts to effect service of the OIP on Respondent.

The parties' attention is called to the Commission's March 18, 2020 order regarding the filing and service of papers, which provides that, pending further order of the Commission, parties shall to the extent possible submit all filings electronically at [apfilings@sec.gov](mailto:apfilings@sec.gov).<sup>5</sup> Also, the Commission's Rules of Practice were recently amended to include new e-filing requirements, which took effect on April 12, 2021.<sup>6</sup>

For the Commission, by the Office of the General Counsel, pursuant to delegated authority.

Vanessa A. Countryman  
Secretary

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<sup>4</sup> See Rule of Practice 141(a)(2)(iv), 17 C.F.R. § 201.141(a)(2)(iv) (providing that service may be made upon corporations or entities in a foreign country by “[a]ny method specified in” Rule 141(a)(2)(ii) “that is not prohibited by the law of the foreign country”); *Alife Corp.*, Exchange Act Release No. 89179, 2020 WL 3529897 (June 29, 2020) (providing that a supplemental declaration “established service of the OIP by describing the steps taken by the Division to determine . . . that mail service is an acceptable means of service in Singapore”).

<sup>5</sup> See *Pending Administrative Proceedings*, Exchange Act Release No. 88415, 2020 WL 1322001, at \*1 (Mar. 18, 2020), <https://www.sec.gov/litigation/opinions/2020/33-10767.pdf>.

<sup>6</sup> *Amendments to the Commission's Rules of Practice*, 85 Fed. Reg. 86,464, 86,474 (Dec. 30, 2020); see also *Amendments to the Commission's Rules of Practice*, Exchange Act Release No. 90442, 2020 WL 7013370 (Nov. 17, 2020); *Instructions for Electronic Filing and Service of Documents in SEC Administrative Proceedings and Technical Specifications*, <https://www.sec.gov/efapdocs/instructions.pdf>. The amendments also impose other obligations on parties to administrative proceedings such as a new redaction and omission of sensitive personal information requirement. *Amendments to the Commission's Rules of Practice*, 85 Fed. Reg. at 86,465–81.