



LIFE AND ACCIDENT AND HEALTH COMPANIES - ASSOCIATION EDITION - SEPARATE ACCOUNTS

ANNUAL STATEMENT

FOR THE YEAR ENDED DECEMBER 31, 2009

OF THE CONDITION AND AFFAIRS OF THE SEPARATE ACCOUNTS OF THE

Symetra Life Insurance Company

NAIC Group Code 1129 1129 NAIC Company Code 68608 Employer's ID Number 91-0742147
(Current) (Prior)

Organized under the Laws of Washington, State of Domicile or Port of Entry Washington

Country of Domicile United States of America

Incorporated/Organized 01/23/1957 Commenced Business 04/05/1957

Statutory Home Office 777 108th Avenue NE, Suite 1200, Bellevue, WA 98004
(Street and Number) (City or Town, State and Zip Code)

Main Administrative Office 777 108th Avenue NE, Suite 1200
(Street and Number)
Bellevue, WA 98004, 425-256-8000
(City or Town, State and Zip Code) (Area Code) (Telephone Number)

Mail Address P.O.Box 34690, Seattle, WA 98124-1690
(Street and Number or P.O. Box) (City or Town, State and Zip Code)

Primary Location of Books and Records 777 108th Avenue NE, Suite 1200
(Street and Number)
Bellevue, WA 98004, 425-256-8000
(City or Town, State and Zip Code) (Area Code) (Telephone Number)

Internet Website Address www.symetra.com

Statutory Statement Contact Kristin Janeen Khalighi, 425-256-8557
(Name) (Area Code) (Telephone Number)
kristin.khalighi@symetra.com, 425-256-5818
(E-mail Address) (FAX Number)

OFFICERS

President Randall Howard Talbot Treasurer Colleen Mary Murphy
Secretary George Christopher Pagos Chief Actuary Tommie David Brooks

OTHER

| | | |
|--|---|--|
| <u>Allyn David Close</u> Senior Vice President | <u>Jennifer Victoria Davies</u> Senior Vice President | <u>Colin Michael Elder</u> Vice President |
| <u>David Christopher Fry #</u> Vice President | <u>Michael William Fry</u> Senior Vice President | <u>John Eric Galaviz</u> Vice President |
| <u>Roger Floyd Harbin</u> Executive Vice President | <u>Laurie Ann Hubbard</u> Vice President | <u>Christine Ann Katzmar Holmes</u> Vice President |
| <u>Michele Marie Kemper</u> Vice President | <u>Richard Jeffers Lindsay</u> Senior Vice President | <u>Richard Joseph Lyons</u> Vice President |
| <u>Michael Edward Madden</u> Vice President | <u>Linda Corlett Mahaffey</u> Vice President | <u>David Elliott Manning</u> Vice President |
| <u>Patrick Bryan McCormick</u> Senior Vice President | <u>Kimberly Elaine McSheridan</u> Vice President | <u>Margaret Alice Meister</u> Executive Vice President |
| <u>Troy Junko Olson-Blair</u> Vice President | <u>James Dwyer Pirak</u> Vice President | <u>Craig James Schmidt</u> Vice President |
| <u>John Richard Warren</u> Vice President | | |

DIRECTORS OR TRUSTEES

| | | |
|----------------------------------|---------------------------------|---------------------------------|
| <u>Allyn David Close</u> | <u>Jennifer Victoria Davies</u> | <u>Michael William Fry #</u> |
| <u>Richard Jeffers Lindsay #</u> | <u>Margaret Alice Meister</u> | <u>George Christopher Pagos</u> |
| <u>Randall Howard Talbot</u> | | |

State of Washington SS:
County of King

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC Annual Statement Instructions and Accounting Practices and Procedures manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

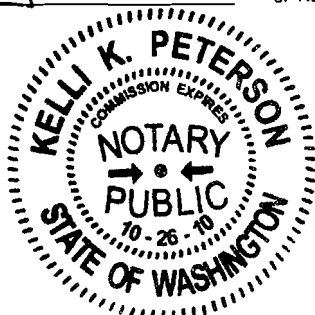
Randall Howard Talbot
Randall Howard Talbot
President

Margaret Alice Meister
Margaret Alice Meister
Chief Financial Officer

Colleen Mary Murphy
Colleen Mary Murphy
Treasurer

Subscribed and sworn to before me this 12th day of February, 2010
Kelli K Peterson

- a. Is this an original filing? Yes [X] No []
- b. If no,
1. State the amendment number
 2. Date filed
 3. Number of pages attached



ASSETS

| | Current Year | | | Prior Year |
|--|-------------------------------|--------------------------|-----------------------------|---------------|
| | 1 General Account Basis | 2 Fair Value Basis | 3 Total (Cols. 1 + 2) | 4 Total |
| 1. Bonds (Schedule D)..... | 3,120,609,323 | | 3,120,609,323 | 2,886,584,232 |
| 2. Stocks (Schedule D): | | | | |
| 2.1 Preferred stocks | | | | 38,303,034 |
| 2.2 Common stocks | | 840,022,056 | 840,022,056 | 716,088,048 |
| 3. Mortgage loans on real estate (Schedule B) | | | | |
| 4. Real estate (Schedule A): | | | | |
| 4.1 Properties held for the production of income (less \$ encumbrances) | | | | |
| 4.2 Properties held for sale (less \$ encumbrances) | | | | |
| 5. Contract loans | | | | |
| 6. Cash (\$(1,629), Schedule E - Part 1), and cash equivalents (\$, Schedule E - Part 2) | (1,629) | | (1,629) | |
| 7. Short-term investments (Schedule DA) | 124,394,520 | | 124,394,520 | 46,286,862 |
| 8. Other invested assets (Schedule BA) | 3,525,895 | | 3,525,895 | 3,526,660 |
| 9. Aggregate write-ins for invested assets | | | | |
| 10. Subtotals, cash and invested assets (Lines 1 to 9) | 3,248,528,109 | 840,022,056 | 4,088,550,165 | 3,690,788,836 |
| 11. Investment income due and accrued | 32,871,174 | | 32,871,174 | 30,625,076 |
| 12. Receivables for securities | 25,570 | | 25,570 | 95,976 |
| 13. Net adjustment in assets and liabilities due to foreign exchange rates | | | | |
| 14. Aggregate write-ins for other than invested assets..... | | | | |
| 15. Total (Lines 10 to 14) | 3,281,424,853 | 840,022,056 | 4,121,446,909 | 3,721,509,888 |
| DETAILS OF WRITE-INS | | | | |
| 0901. | | | | |
| 0902. | | | | |
| 0903. | | | | |
| 0998. Summary of remaining write-ins for Line 9 from overflow page | | | | |
| 0999. Totals (Lines 0901 thru 0903 plus 0998)(Line 9 above) | | | | |
| 1401. | | | | |
| 1402. | | | | |
| 1403. | | | | |
| 1498. Summary of remaining write-ins for Line 14 from overflow page | | | | |
| 1499. Totals (Lines 1401 thru 1403 plus 1498)(Line 14 above) | | | | |

LIABILITIES AND SURPLUS

| | Current Year | | | Prior Year |
|---|-------------------------------|--------------------------|-----------------------------|---------------|
| | 1 General Account Basis | 2 Fair Value Basis | 3 Total (Cols. 1 + 2) | 4 Total |
| 1. Aggregate reserve for life, annuity and accident and health contracts (Exhibit 3, Line 9999999, Col. 2) | 3,186,677,470 | 826,900,959 | 4,013,578,429 | 3,692,717,430 |
| 2. Liability for deposit-type contracts (Exhibit 4, Line 9, Col. 1) | | 6,402,104 | 6,402,104 | 6,240,003 |
| 3. Interest Maintenance Reserve | 5,467,341 | | 5,467,341 | 4,801,295 |
| 4. Charges for investment management, administration and contract guarantees due or accrued | | | | |
| 5. Investment expenses due or accrued (Exhibit 1, Line 24) | | | | |
| 6. Investment taxes, licenses and fees due or accrued, excluding federal income taxes (Exhibit 2, Line 8) | | | | |
| 7. Federal and foreign income taxes due or accrued (excluding deferred taxes) | | | | |
| 8. Reserve for future federal income taxes | | | | |
| 9. Unearned investment income | | | | |
| 10. Other transfers to general account due or accrued (net) (including \$6,718,993 accrued expense allowances recognized in reserves) | 73,268 | 6,718,993 | 6,792,261 | 6,913,278 |
| 11. Remittances and items not allocated | | | | |
| 12. Payable for securities | 66,270,849 | | 66,270,849 | 6,510,807 |
| 13. Net adjustment in assets and liabilities due to foreign exchange rates | | | | |
| 14. Aggregate write-ins for liabilities | 22,935,925 | | 22,935,925 | 4,327,075 |
| 15. Total liabilities (including \$73,268 due or accrued net transfers to or (from) the general account) | 3,281,424,853 | 840,022,056 | 4,121,446,909 | 3,721,509,888 |
| 16. Contributed surplus | | | | |
| 17. Aggregate write-ins for special surplus funds | | | | |
| 18. Unassigned funds | | | | |
| 19. Surplus (Lines 16 through 18) | | | | |
| 20. Totals | 3,281,424,853 | 840,022,056 | 4,121,446,909 | 3,721,509,888 |
| DETAILS OF WRITE-INS | | | | |
| 1401. Payable to general account | 22,935,925 | | 22,935,925 | 4,327,075 |
| 1402. | | | | |
| 1403. | | | | |
| 1498. Summary of remaining write-ins for Line 14 from overflow page | | | | |
| 1499. Totals (Lines 1401 thru 1403 plus 1498)(Line 14 above) | 22,935,925 | | 22,935,925 | 4,327,075 |
| 1701. | | | | |
| 1702. | | | | |
| 1703. | | | | |
| 1798. Summary of remaining write-ins for Line 17 from overflow page | | | | |
| 1799. Totals (Lines 1701 thru 1703 plus 1798)(Line 17 above) | | | | |

SUMMARY OF OPERATIONS

| | 1 Current Year | 2 Prior Year |
|--|-------------------|-----------------|
| 1. Transfers to Separate Accounts: | | |
| 1.1 Net premiums and annuity considerations for life and accident and health contracts | 119,403,037 | 157,145,875 |
| 1.2 Considerations for supplementary contracts with life contingencies | | |
| 1.3 Aggregate write-ins for other transfers to Separate Accounts | 137,765,148 | 139,379,241 |
| 1.4 Totals (Lines 1.1 to 1.3) | 257,168,185 | 296,525,116 |
| 2. Transfers on account of deposit-type contracts (including \$ 327,737 deposits less \$ 579,574 withdrawals) | (1,411,535) | (2,807,408) |
| 3. Net investment income and capital gains and losses | 351,926,106 | (223,121,018) |
| 4. Aggregate write-ins for other income | | |
| 5. Totals (Lines 1.4 to 4) | 607,682,756 | 70,596,690 |
| DEDUCT: | | |
| 6. Transfers from the Separate Account on account of contract benefits: | | |
| 6.1 Death benefits | 9,946,927 | 7,920,502 |
| 6.2 Matured endowments | | |
| 6.3 Annuity benefits | | |
| 6.4 Payments on supplementary contracts with life contingencies | | |
| 6.5 Accident and health benefits | | |
| 6.6 Surrender benefits and withdrawals for life contracts | 127,346,802 | 166,959,831 |
| 6.7 Aggregate write-ins for other transfers from Separate Accounts on account of contract benefits | 147,751,435 | 158,822,310 |
| 7. Transfers on account of policy loans | 1,317,208 | 607,943 |
| 8. Net transfer of reserves from or (to) Separate Accounts | (47,618,292) | (44,734,105) |
| 9. Other transfers from the Separate Accounts: | | |
| 9.1 Federal and foreign income taxes incurred | | |
| 9.2 Change in expense allowances recognized in reserves | (194,285) | (3,564,309) |
| 9.3 Aggregate write-ins for other transfers from Separate Accounts | 73,268 | |
| 10. Subtotals (Lines 6.1 to 9.3) | 238,623,063 | 286,012,172 |
| 11. Fees associated with charges for investment management, administration and contract guarantees | 48,036,593 | 51,904,961 |
| 12. Increase in aggregate reserve for life and accident and health contracts | 320,860,999 | (261,543,405) |
| 13. Increase in liability for deposit-type contracts | 162,101 | (6,161,604) |
| 14. Increase in reserve for future federal income taxes | | |
| 15. Aggregate write-ins for reserves and funds | | |
| 16. Totals (Lines 10 to 15) | 607,682,756 | 70,212,124 |
| 17. Net gain from operations (including \$ unrealized capital gains) (Line 5 minus Line 16) | | 384,566 |
| SURPLUS ACCOUNT | | |
| 18. Surplus, December 31, prior year | | |
| 19. Net gain from operations (Line 17) | | 384,566 |
| 20. Surplus contributed or (withdrawn) during year | | (384,566) |
| 21. Change in reserve on account of change in valuation basis, (increase) or decrease | | |
| 22. Transfer from Separate Accounts of the change in expense allowances recognized in Line 21 | | |
| 23. Aggregate write-ins for gains and losses in surplus | | |
| 24. Surplus, December 31, current year (Page 3, Line 19) | | |
| DETAILS OF WRITE-INS | | |
| 01.301. Internal transfers in | 137,765,148 | 139,379,241 |
| 01.302. | | |
| 01.303. | | |
| 01.398. Summary of remaining write-ins for Line 1.3 from overflow page | | |
| 01.399. Totals (Lines 01.301 thru 01.303 plus 01.398)(Line 1.3 above) | 137,765,148 | 139,379,241 |
| 0401. | | |
| 0402. | | |
| 0403. | | |
| 0498. Summary of remaining write-ins for Line 4 from overflow page | | |
| 0499. Totals (Lines 0401 thru 0403 plus 0498)(Line 4 above) | | |
| 06.701. Internal transfers out | 147,751,435 | 158,822,310 |
| 06.702. | | |
| 06.703. | | |
| 06.798. Summary of remaining write-ins for Line 6.7 from overflow page | | |
| 06.799. Totals (Lines 06.701 thru 06.703 plus 06.798)(Line 6.7 above) | 147,751,435 | 158,822,310 |
| 09.301. Accrual transfer of realized and unrealized gain/loss | 73,268 | |
| 09.302. | | |
| 09.303. | | |
| 09.398. Summary of remaining write-ins for Line 9.3 from overflow page | | |
| 09.399. Totals (Lines 09.301 thru 09.303 plus 09.398)(Line 9.3 above) | 73,268 | |
| 1501. | | |
| 1502. | | |
| 1503. | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | |
| 1599. Totals (Lines 1501 thru 1503 plus 1598)(Line 15 above) | | |
| 2301. | | |
| 2302. | | |
| 2303. | | |
| 2398. Summary of remaining write-ins for Line 23 from overflow page | | |
| 2399. Totals (Lines 2301 thru 2303 plus 2398)(Line 23 above) | | |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company
ANALYSIS OF OPERATIONS BY LINES OF BUSINESS

| | 1 Total | Ordinary | | | Group | | Accident and Health | | 9 Aggregate of All Other Lines of Business |
|---|--------------|---------------------|---------------------------|------------------------------|---------------------|----------------|---------------------|------------|---|
| | | 2 Life Insurance | 3 Individual Annuities | 4 Supplementary Contracts | 5 Life Insurance | 6 Annuities | 7 Group | 8 Other | |
| 1. Transfers to Separate Accounts: | | | | | | | | | |
| 1.1 Net premiums and annuity considerations for life and accident and health contracts | 119,403,037 | 11,691,231 | 37,410,348 | | 25,043,012 | 45,258,446 | | | |
| 1.2 Considerations for supplementary contracts with life contingencies | | | | | | | | | |
| 1.3 Aggregate write-ins for other transfers to Separate Accounts | 137,765,148 | 14,396,938 | 81,465,097 | | | 41,903,113 | | | |
| 1.4 Totals (Lines 1.1 to 1.3) | 257,168,185 | 26,088,169 | 118,875,445 | | 25,043,012 | 87,161,559 | | | |
| 2. Transfers on account of deposit-type contracts (including \$ 327,737 deposits less \$ 579,574 withdrawals) | (1,411,535) | | | | | (1,411,535) | | | |
| 3. Net investment income and capital gains and losses | 351,926,106 | 180,865,515 | 104,207,821 | | 3,629,830 | 63,222,940 | | | |
| 4. Aggregate write-ins for other income | | | | | | | | | |
| 5. Totals (Lines 1.4 to 4) | 607,682,756 | 206,953,684 | 223,083,266 | | 28,672,842 | 148,972,964 | | | |
| DEDUCT: | | | | | | | | | |
| 6. Transfers from the Separate Account on account of contract benefits: | | | | | | | | | |
| 6.1 Death benefits | 9,946,927 | 9,946,927 | | | | | | | |
| 6.2 Matured endowments | | | | | | | | | |
| 6.3 Annuity benefits | | | | | | | | | |
| 6.4 Payments on supplementary contracts with life contingencies | | | | | | | | | |
| 6.5 Accident and health benefits | | | | | | | | | |
| 6.6 Surrender benefits and withdrawals for life contracts | 127,346,802 | 8,172,851 | 47,785,411 | | | 71,388,540 | | | |
| 6.7 Aggregate write-ins for other transfers from Separate Accounts on account of contract benefits | 147,751,435 | 14,244,951 | 89,272,327 | | | 44,234,157 | | | |
| 7. Transfers on account of policy loans | 1,317,208 | 1,317,208 | | | | | | | |
| 8. Net transfer of reserves from or (to) Separate Accounts | (47,618,292) | (47,618,292) | | | | | | | |
| 9. Other transfers from the Separate Accounts: | | | | | | | | | |
| 9.1 Federal and foreign income taxes incurred | | | | | | | | | |
| 9.2 Change in expense allowances recognized in reserves | (194,285) | (617,590) | 423,305 | | | | | | |
| 9.3 Aggregate write-ins for other transfers from Separate Accounts | 73,268 | (1,263,657) | | | 1,336,925 | | | | |
| Subtotals (Lines 6.1 to 9.3) | 238,623,063 | (15,817,602) | 137,481,043 | | 1,336,925 | 115,622,697 | | | |
| 11. Fees associated with charges for investment management, administration and contract guarantees | 48,036,593 | 38,237,770 | 5,748,608 | | 521,768 | 3,528,447 | | | |
| 12. Increase in aggregate reserve for life and accident and health contracts | 320,860,999 | 184,533,516 | 79,853,615 | | 26,814,149 | 29,659,719 | | | |
| 13. Increase in liability for deposit-type contracts | 162,101 | | | | | 162,101 | | | |
| 14. Increase in reserve for future federal income taxes | | | | | | | | | |
| 15. Aggregate write-ins for reserves and funds | | | | | | | | | |
| 16. Totals (Lines 10 to 15) | 607,682,756 | 206,953,684 | 223,083,266 | | 28,672,842 | 148,972,964 | | | |
| 17. Net gain from operations (including \$ unrealized capital gains) (Line 5 minus Line 16) | | | | | | | | | |
| DETAILS OF WRITE-INS | | | | | | | | | |
| 01.301. Internal transfers in | 137,765,148 | 14,396,938 | 81,465,097 | | | 41,903,113 | | | |
| 01.302. | | | | | | | | | |
| 01.303. | | | | | | | | | |
| 01.398. Summary of remaining write-ins for Line 1.3 from overflow page | | | | | | | | | |
| 01.399. Totals (Lines 01.301 thru 01.303 plus 01.398) (Line 1.3 above) | 137,765,148 | 14,396,938 | 81,465,097 | | | 41,903,113 | | | |
| 0401. | | | | | | | | | |
| 0402. | | | | | | | | | |
| 0403. | | | | | | | | | |
| 0498. Summary of remaining write-ins for Line 4 from overflow page | | | | | | | | | |
| 0499. Totals (Lines 0401 thru 0403 plus 0498) (Line 4 above) | | | | | | | | | |
| 06.701. Internal transfers out | 147,751,435 | 14,244,951 | 89,272,327 | | | 44,234,157 | | | |
| 06.702. | | | | | | | | | |
| 06.703. | | | | | | | | | |
| 06.798. Summary of remaining write-ins for Line 6.7 from overflow page | | | | | | | | | |
| 06.799. Totals (Lines 06.701 thru 06.703 plus 06.798) (Line 6.7 above) | 147,751,435 | 14,244,951 | 89,272,327 | | | 44,234,157 | | | |
| 09.301. Accrual transfer of realized and unrealized gain/loss | 73,268 | (1,263,657) | | | 1,336,925 | | | | |
| 09.302. | | | | | | | | | |
| 09.303. | | | | | | | | | |
| 09.398. Summary of remaining write-ins for Line 9.3 from overflow page | | | | | | | | | |
| 09.399. Totals (Lines 09.301 thru 09.303 plus 09.398) (Line 9.3 above) | 73,268 | (1,263,657) | | | 1,336,925 | | | | |
| 1501. | | | | | | | | | |
| 1502. | | | | | | | | | |
| 1503. | | | | | | | | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | | | | | | | | |
| 1599. Totals (Lines 1501 thru 1503 plus 1598) (Line 15 above) | | | | | | | | | |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company
ANALYSIS OF INCREASE IN RESERVES DURING THE YEAR

| | 1 Total | Ordinary | | | Group | |
|--|---------------|---------------------|---------------------------|------------------------------|---------------------|----------------|
| | | 2 Life Insurance | 3 Individual Annuities | 4 Supplementary Contracts | 5 Life Insurance | 6 Annuities |
| 1. Reserve Dec. 31 of prior year | 3,692,717,430 | 3,003,470,916 | 390,611,148 | | 54,396,360 | 244,239,006 |
| 2. Tabular net premiums and considerations for annuities and supplementary contracts with life contingencies | 257,168,185 | 26,088,169 | 118,875,445 | | 25,043,012 | 87,161,559 |
| 3. Increase or (decrease) from investment results after provision for federal income taxes | 350,272,740 | 180,865,515 | 104,207,821 | | 3,629,830 | 61,569,574 |
| 4. Tabular less actual reserve released | | | | | | |
| 5. Increase in reserve on account of change in valuation basis | | | | | | |
| 6. Other increases (net) | | | | | | |
| 7. Totals (Lines 1 to 6) | 4,300,158,355 | 3,210,424,600 | 613,694,414 | | 83,069,202 | 392,970,139 |
| 8. Net transfer of reserves from or (to) Separate Accounts | (47,618,292) | (47,618,292) | | | | |
| 9. Tabular cost | | | | | | |
| 10. Reserves released by death | 9,946,927 | 9,946,927 | | | | |
| 11. Reserves released by other terminations (net) | 276,221,160 | 23,117,420 | 137,481,043 | | | 115,622,697 |
| 12. Transfers on account of annuity and supplementary contract payments involving life contingencies | | | | | | |
| 13. Charges for investment management, administration and contract guarantees | 47,956,863 | 38,237,770 | 5,748,608 | | 521,768 | 3,448,717 |
| 14. Aggregate write-ins for other decreases in reserves | 73,268 | (1,263,657) | | | 1,336,925 | |
| 15. Total deductions (Lines 8 to 14) | 286,579,926 | 22,420,168 | 143,229,651 | | 1,858,693 | 119,071,414 |
| 16. Reserve December 31 of current year | 4,013,578,429 | 3,188,004,432 | 470,464,763 | | 81,210,509 | 273,898,725 |
| DETAILS OF WRITE-INS | | | | | | |
| 1401. Accrual transfer for realized and unrealized gain/loss | 73,268 | (1,263,657) | | | 1,336,925 | |
| 1402. | | | | | | |
| 1403. | | | | | | |
| 1498. Summary of remaining write-ins for Line 14 from overflow page | | | | | | |
| 1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above) | 73,268 | (1,263,657) | | | 1,336,925 | |

EXHIBIT OF NET INVESTMENT INCOME

| | 1 Collected During Year | 2 Earned During Year |
|---|----------------------------|-------------------------|
| 1. U.S. Government bonds | (a) 397,144 | 370,777 |
| 1.1 Bonds exempt from U.S. tax | (a) | |
| 1.2 Other bonds (unaffiliated) | (a) 166,156,829 | 168,462,623 |
| 1.3 Bonds of affiliates | (a) | |
| 2.1 Preferred stocks (unaffiliated) | (b) | |
| 2.11 Preferred stocks of affiliates | (b) | |
| 2.2 Common stocks (unaffiliated) | 22,148,540 | 22,148,540 |
| 2.21 Common stocks of affiliates | | |
| 3. Mortgage loans | (c) | |
| 4. Real estate | (d) | |
| 5. Contract loans | | |
| 6. Cash, cash equivalents and short-term investments | (e) 297,810 | 264,481 |
| 7. Derivative instruments | (f) | |
| 8. Other invested assets | 270,275 | 270,275 |
| 9. Aggregate write-ins for investment income | 41,693 | (624,354) |
| 10. Total gross investment income | 189,312,291 | 190,892,342 |
| 11. Investment expenses | | (g) |
| 12. Investment taxes, licenses and fees, excluding federal income taxes | | (g) |
| 13. Interest expense | | (h) |
| 14. Depreciation on real estate and other invested assets | | (i) |
| 15. Aggregate write-ins for deductions from investment income | | |
| 16. Total deductions (Lines 11 through 15) | | |
| 17. Net investment income (Line 10 minus Line 16) | | 190,892,342 |
| DETAILS OF WRITE-INS | | |
| 0901. Interest Maintenance Reserve | | (666,047) |
| 0902. Other Investment Income | 41,693 | 41,693 |
| 0903. | | |
| 0998. Summary of remaining write-ins for Line 9 from overflow page | | |
| 0999. Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above) | 41,693 | (624,354) |
| 1501. | | |
| 1502. | | |
| 1503. | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | |
| 1599. Totals (Lines 1501 thru 1503 plus 1598) (Line 15, above) | | |

- (a) Includes \$ 5,258,717 accrual of discount less \$ 7,617,729 amortization of premium and less \$ 2,877,093 paid for accrued interest on purchases.
- (b) Includes \$ accrual of discount less \$ amortization of premium and less \$ paid for accrued dividends on purchases.
- (c) Includes \$ accrual of discount less \$ amortization of premium and less \$ paid for accrued interest on purchases.
- (d) Includes \$ for company's occupancy of its own buildings; and excludes \$ interest on encumbrances.
- (e) Includes \$ accrual of discount less \$ amortization of premium and less \$ paid for accrued interest on purchases.
- (f) Includes \$ accrual of discount less \$ amortization of premium.
- (g) Includes \$ investment expenses and \$ investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$ interest on surplus notes and \$ interest on capital notes.
- (i) Includes \$ depreciation on real estate and \$ depreciation on other invested assets.

EXHIBIT OF CAPITAL GAINS (LOSSES)

| | 1 | 2 | 3 | 4 | 5 |
|--|--|-------------------------------|--|--|---|
| | Realized Gain (Loss) On Sales or Maturity | Other Realized Adjustments | Total Realized Capital Gain (Loss) (Columns 1 + 2) | Change in Unrealized Capital Gain (Loss) | Change in Unrealized Foreign Exchange Capital Gain (Loss) |
| 1. U.S. Government bonds | 32,782 | | 32,782 | | |
| 1.1 Bonds exempt from U.S. tax | | | | | |
| 1.2 Other bonds (unaffiliated) | (355,991) | (3,589,651) | (3,945,642) | 718,846 | |
| 1.3 Bonds of affiliates | | | | | |
| 2.1 Preferred stocks (unaffiliated) | | | | | |
| 2.11 Preferred stocks of affiliates | | | | | |
| 2.2 Common stocks (unaffiliated) | (103,653,130) | | (103,653,130) | 268,103,505 | |
| 2.21 Common stocks of affiliates | | | | | |
| 3. Mortgage loans | | | | | |
| 4. Real estate | | | | | |
| 5. Contract loans | | | | | |
| 6. Cash, cash equivalents and short-term investments | | | | | |
| 7. Derivative instruments | | | | | |
| 8. Other invested assets | | | | | |
| 9. Aggregate write-ins for capital gains (losses) | | (222,595) | (222,595) | | |
| 10. Total capital gains (losses) | (103,976,339) | (3,812,246) | (107,788,585) | 268,822,351 | |
| DETAILS OF WRITE-INS | | | | | |
| 0901. Cumulative Effect Adjustment SSAP 43R | | (222,595) | (222,595) | | |
| 0902. | | | | | |
| 0903. | | | | | |
| 0998. Summary of remaining write-ins for Line 9 from overflow page | | | | | |
| 0999. Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above) | | (222,595) | (222,595) | | |

Exhibit 1
NONE

Exhibit 2
NONE

EXHIBIT 3 - AGGREGATE RESERVE FOR LIFE, ANNUITY AND ACCIDENT AND HEALTH CONTRACTS

| 1 Description of Valuation Basis | 2 Total | 3 Ordinary | 4 Group |
|---|---------------|---------------|-------------|
| 0100001. 80 CSO - CRVM 4.5% (1995-2006) | 3,155,132,743 | 3,155,084,143 | 48,600 |
| 0100002. 80 CSO - CRVM 4% (2007-2008) | 88,699,691 | 27,512,017 | 61,187,674 |
| 0100003. 2001 CSO - CRVM 4% (2007-NB) | 25,382,507 | 5,408,272 | 19,974,235 |
| 0199999. Totals | 3,269,214,941 | 3,188,004,432 | 81,210,509 |
| 0200001. Deferred Variable NAV MV | 744,363,488 | 470,464,763 | 273,898,725 |
| 0299999. Totals | 744,363,488 | 470,464,763 | 273,898,725 |
| 9999999. Totals (to Page 3, Line 1) | 4,013,578,429 | 3,658,469,195 | 355,109,234 |

EXHIBIT 3 - INTERROGATORIES

- 1.1 Has the reporting entity ever issued both participating and non-participating variable life insurance contracts?..... Yes [] No []
- 2.1 Does the reporting entity at present issue both participating and non-participating variable life insurance contracts?..... Yes [] No []
- 2.2 If not, state which kind is issued
Non-participating
- 3.1 Is any surrender value promised in excess of the reserve as legally computed? Yes [] No [] N/A []
- 3.2 If so, the amount of such excess must be included in surrender values in excess of reserves otherwise required and carried in this schedule. Has this been done? Yes [] No [] N/A []
Attach a statement of methods employed in the valuation of variable life insurance contracts issued at, or subsequently subject to, an extra premium or in the valuation of contracts otherwise issued on lives classified as substandard for the plan of contract issued or on special class lives (including paid-up variable life insurance).

EXHIBIT 3A - CHANGES IN BASIS OF VALUATION DURING THE YEAR

(Including supplementary contracts set up on a basis other than that used to determine benefits)

| 1 Description of Valuation Class | Valuation Basis | | 4 Increase in Actuarial Reserve Due to Change |
|---|-------------------|-----------------|--|
| | 2 Changed From | 3 Changed To | |
| NONE | | | |
| 9999999 - Totals (Page 6, Line 5, Analysis of Increase in Reserves) | | | |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

EXHIBIT 4 - DEPOSIT TYPE CONTRACTS

| | 1 | 2 | 3 | 4 | 5 | 6 |
|---|-----------|----------------------------------|-------------------|---------------------------|---|------------------------------------|
| | Total | Guaranteed Interest Contracts | Annuities Certain | Supplemental Contracts | Dividend Accumulations or Refunds | Premium and Other Deposit Funds |
| 1. Balance at the beginning of the year | 6,240,003 | | | | | 6,240,003 |
| 2. Deposits received during the year | 327,737 | | | | | 327,737 |
| 3. Investment earnings credited to account | 415,348 | | | | | 415,348 |
| 4. Other net change in reserves | | | | | | |
| 5. Fees and other charges assessed | 1,410 | | | | | 1,410 |
| 6. Surrender charges | | | | | | |
| 7. Net surrender or withdrawal payments | 579,574 | | | | | 579,574 |
| 8. Other net transfer to or (from) general account | | | | | | |
| 9. Balance at the end of current year (Lines 1+2+3+4-5-6-7-8) | 6,402,104 | | | | | 6,402,104 |

EXHIBIT 5 - RECONCILIATION OF CASH AND INVESTED ASSETS

| DEVELOPMENT OF INCREASE IN CASH | | 1 Amount |
|---|--|---------------|
| 1. Transfers to Separate Accounts on account of: | | |
| 1.1 Net premiums and considerations for annuities and supplementary contracts with life contingencies | | 119,403,037 |
| 1.2 Aggregate write-ins for other transfers to Separate Accounts | | 137,765,148 |
| 2. Deposits on deposit-type contract funds and other liabilities without life or disability contingencies | | 327,737 |
| 3. Investment income collected | | 191,672,066 |
| 4. Consideration on disposal of short-term bonds net of purchases | | (78,107,658) |
| 5. Consideration on disposal of investments (excluding short-term bonds) | | 1,045,765,392 |
| 6. Aggregate write-ins for other increases in funds from operations | | 18,608,850 |
| 7. Total (Lines 1 to 6) | | 1,435,434,572 |
| 8. Cost of investments acquired (excluding short-term bonds) | | 1,206,746,703 |
| 9. Transfers from Separate Accounts on account of contract benefits: | | |
| 9.1 Death benefits | | 9,946,927 |
| 9.2 Matured endowments | | |
| 9.3 Annuity benefits | | |
| 9.4 Supplementary contract benefits with life contingencies | | |
| 9.5 Accident and health benefits | | |
| 9.6 Surrender benefits and withdrawals for life contracts | | 127,346,802 |
| 9.7 Policy loans (net) | | 1,317,208 |
| 9.8 Transfers of reserves (net) | | (47,618,292) |
| 9.9 Aggregate write-ins for other transfers from Separate Accounts on account of contract benefits | | 147,751,435 |
| 10. Other transfers from Separate Accounts: | | |
| 10.1 Federal income taxes | | |
| 10.2 Aggregate write-ins for other transfers from Separate Accounts | | 73,268 |
| 11. Withdrawals on deposit-type contract funds and other liabilities without life or disability contingencies | | 1,739,272 |
| 12. Investment expenses (Exhibit 1, Line 25) | | |
| 12.1 Fees associated with investment management, administration and contract guarantees | | 48,036,593 |
| 13. Investment taxes, licenses and fees, excluding federal income taxes (Exhibit 2, Line 9) | | |
| 14. Total (Lines 8 to 13) | | 1,495,339,916 |
| 15. Funds from operations (Line 7 minus Line 14) | | (59,905,344) |
| 16. Surplus contributed or (withdrawn) during year | | |
| 17. Aggregate write-ins for other changes in funds | | |
| 18. Total funds (includes \$ 17,133,587 net transfers from general account) (Lines 15 to 17) | | (59,905,344) |
| 19. Increase in payable for investments acquired, net of receivable for investments sold | | 59,830,447 |
| 20. Decrease in policy loans | | |
| 21. Aggregate write-ins for other reconciling items | | 73,268 |
| 22. Increase in cash (Line 18 to 21) | | (1,629) |
| RECONCILIATION BETWEEN YEARS | | |
| 23. Cash and invested assets, December 31st of prior year | | 3,690,788,836 |
| 24. Increase in cash (Line 22) | | (1,629) |
| 25. Cost of invested assets acquired | | 2,153,445,245 |
| 26. Adjusted cost of assets disposed of | | 2,018,332,615 |
| 27. Increase in policy loans | | |
| 28. Accrual of discount less amortization of premium | | (2,359,777) |
| 29. Depreciation on real estate and other invested assets | | |
| 30. Increase in net unrealized gains | | 268,822,351 |
| 31. Aggregate write-ins for other reconciling items | | (3,812,246) |
| 32. Cash and invested assets, December 31st of current year | | 4,088,550,165 |
| DETAILS OF WRITE-INS | | |
| 01.201. Internal transfers in | | 137,765,148 |
| 01.202. | | |
| 01.203. | | |
| 01.298. Summary of remaining write-ins for Line 1.2 from overflow page | | |
| 01.299. Totals (Lines 01.201 thru 01.203 plus 01.298) (Line 1.2 above) | | 137,765,148 |
| 0601. Change in payable to general account | | 18,608,850 |
| 0602. | | |
| 0603. | | |
| 0698. Summary of remaining write-ins for Line 6 from overflow page | | |
| 0699. Totals (Lines 0601 thru 0603 plus 0698) (Line 6 above) | | 18,608,850 |
| 09.901. Internal transfers out | | 147,751,435 |
| 09.902. | | |
| 09.903. | | |
| 09.998. Summary of remaining write-ins for Line 9.9 from overflow page | | |
| 09.999. Totals (Lines 09.901 thru 09.903 plus 09.998) (Line 9.9 above) | | 147,751,435 |
| 10.201. Accrual transfer for realized and unrealized gain/loss | | 73,268 |
| 10.202. | | |
| 10.203. | | |
| 10.298. Summary of remaining write-ins for Line 10.2 from overflow page | | |
| 10.299. Totals (Lines 10.201 thru 10.203 plus 10.298) (Line 10.2 above) | | 73,268 |
| 1701. | | |
| 1702. | | |
| 1703. | | |
| 1798. Summary of remaining write-ins for Line 17 from overflow page | | |
| 1799. Totals (Lines 1701 thru 1703 plus 1798) (Line 17 above) | | |
| 2101. Change in due or accrued transfers for realized and unrealized gain/loss | | 73,268 |
| 2102. | | |
| 2103. | | |
| 2198. Summary of remaining write-ins for Line 21 from overflow page | | |
| 2199. Totals (Lines 2101 thru 2103 plus 2198) (Line 21 above) | | 73,268 |
| 3101. Realized loss on other than temporary impairment | | (3,812,246) |
| 3102. | | |
| 3103. | | |
| 3198. Summary of remaining write-ins for Line 31 from overflow page | | |
| 3199. Totals (Lines 3101 thru 3103 plus 3198) (Line 31 above) | | (3,812,246) |

EXHIBIT 6 - GUARANTEED INSURANCE AND ANNUITY PRODUCTS

| | 1 | 2 |
|---|---------------|------------------|
| | Amount | Percent of Total |
| 1. Aggregate reserve for life, annuity and accident and health contracts (Included in Exhibit 3): | | |
| 1.1 Life insurance | 3,186,677,470 | 77.3 |
| 1.2 Annuities | | |
| 1.3 Supplementary contracts with life contingencies | | |
| 1.4 Accident and health | | |
| 1.5 Miscellaneous reserves | | |
| 1.6 Total | 3,186,677,470 | 77.3 |
| 2. Liability for deposit-type contracts (included in Exhibit 4): | | |
| 2.1 Guaranteed interest contracts | | |
| 2.2 Annuities certain | | |
| 2.3 Supplemental contracts | | |
| 2.4 Dividend accumulations or refunds | | |
| 2.5 Premium and other deposit funds | | |
| 2.6 Total | | |
| 3. Other liabilities (included in Page 3, Lines 4, 10, 13 & 14) | 23,009,193 | 0.6 |
| 4. Total liabilities associated with guarantees (Lines 1.6 + 2.6 + 3) | 3,209,686,663 | 77.9 |
| 5. Total liabilities not associated with guarantees | 911,760,246 | 22.1 |
| 6. Total Separate Accounts liabilities (Lines 4 + 5 = Page 3, Line 15) | 4,121,446,909 | 100.0% |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company
FORM FOR CALCULATING THE INTEREST MAINTENANCE RESERVE

INTEREST MAINTENANCE RESERVE

| | 1 Amount |
|--|-------------|
| 1. Reserve as of December 31, Prior Year | 4,801,294 |
| 2. Current year's realized pre-tax capital gains/(losses) of \$1,609,766 transferred into the reserve net of taxes of \$ | 1,609,767 |
| 3. Adjustment for current year's liability gains/(losses) released from the reserve | |
| 4. Balance before reduction for amount transferred to Summary of Operations (Line 1 + Line 2 + Line 3) | 6,411,061 |
| 5. Current year's amortization released to Summary of Operations (Amortization, Line 1, Column 4) | 943,720 |
| 6. Reserve as of December 31, current year (Line 4 minus Line 5) | 5,467,341 |

AMORTIZATION

| Year of Amortization | 1 Reserve as of December 31, Prior Year | 2 Current Year's Realized Capital Gains/(Losses) Transferred into the Reserve Net of Taxes | 3 Adjustment for Current Year's Liability Gains/(Losses) Released From the Reserve | 4 Balance Before Reduction for Current Year's Amortization (Cols. 1 + 2 + 3) |
|---------------------------|--|---|---|--|
| 1. 2009 | 382,259 | 561,461 | | 943,720 |
| 2. 2010 | 378,341 | 1,161,748 | | 1,540,089 |
| 3. 2011 | 276,903 | 995,698 | | 1,272,601 |
| 4. 2012 | 283,418 | 582,529 | | 865,947 |
| 5. 2013 | 356,638 | 142,732 | | 499,370 |
| 6. 2014 | 451,758 | (331,603) | | 120,155 |
| 7. 2015 | 513,848 | (521,732) | | (7,884) |
| 8. 2016 | 523,876 | (386,747) | | 137,129 |
| 9. 2017 | 473,276 | (254,517) | | 218,759 |
| 10. 2018 | 331,520 | (109,814) | | 221,706 |
| 11. 2019 | 148,045 | 49,855 | | 197,900 |
| 12. 2020 | (24,993) | 113,577 | | 88,584 |
| 13. 2021 | (90,030) | 79,473 | | (10,557) |
| 14. 2022 | (59,174) | 39,308 | | (19,866) |
| 15. 2023 | (1,069) | 1,746 | | 677 |
| 16. 2024 | 91,147 | (45,752) | | 45,395 |
| 17. 2025 | 179,368 | (66,472) | | 112,896 |
| 18. 2026 | 202,176 | (64,125) | | 138,051 |
| 19. 2027 | 154,057 | (63,364) | | 90,693 |
| 20. 2028 | 102,113 | (61,180) | | 40,933 |
| 21. 2029 | 56,420 | (59,158) | | (2,738) |
| 22. 2030 | 22,960 | (53,149) | | (30,189) |
| 23. 2031 | 6,253 | (42,837) | | (36,584) |
| 24. 2032 | 5,108 | (31,731) | | (26,623) |
| 25. 2033 | 10,405 | (19,832) | | (9,427) |
| 26. 2034 | 11,740 | (6,346) | | 5,394 |
| 27. 2035 | 7,961 | | | 7,961 |
| 28. 2036 | 5,064 | | | 5,064 |
| 29. 2037 | 1,906 | | | 1,906 |
| 30. 2038 | | | | |
| 31. 2039 and Later | | | | |
| 32. Total (Lines 1 to 31) | 4,801,294 | 1,609,767 | | 6,411,061 |

ASSET VALUATION RESERVE
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
DEFAULT COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|--------------------|------------------|--|-----------------------------------|--|-----------------------------------|---|--------------------|--------------------------|-------------------|---------------------------|-----------------|----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols.4 x 5) | 7 Factor | 8 Amount (Cols. 4 x 7) | 9 Factor | 10 Amount (Cols. 4 x 9) |
| LONG-TERM BONDS | | | | | | | | | | | | |
| 1. | | Exempt Obligations | 176,243,160 | XXX | XXX | 176,243,160 | 0.0000 | | 0.0000 | | 0.0000 | |
| 2. | 1 | Highest Quality | 2,200,876,805 | XXX | XXX | 2,200,876,805 | 0.0004 | 880,351 | 0.0023 | 5,062,017 | 0.0030 | 6,602,630 |
| 3. | 2 | High Quality | 692,363,043 | XXX | XXX | 692,363,043 | 0.0019 | 1,315,490 | 0.0058 | 4,015,706 | 0.0090 | 6,231,267 |
| 4. | 3 | Medium Quality | 46,831,404 | XXX | XXX | 46,831,404 | 0.0093 | 435,532 | 0.0230 | 1,077,122 | 0.0340 | 1,592,268 |
| 5. | 4 | Low Quality | 1,994,013 | XXX | XXX | 1,994,013 | 0.0213 | 42,472 | 0.0530 | 105,683 | 0.0750 | 149,551 |
| 6. | 5 | Lower Quality | 2,300,897 | XXX | XXX | 2,300,897 | 0.0432 | 99,399 | 0.1100 | 253,099 | 0.1700 | 391,152 |
| 7. | 6 | In or Near Default | | XXX | XXX | | 0.0000 | | 0.2000 | | 0.2000 | |
| 8. | | Total Unrated Multi-class Securities Acquired by Conversion | | XXX | XXX | | XXX | | XXX | | XXX | |
| 9. | | Total Bonds (Sum of Lines 1 through 8) (Page 2, Line 1, Net Admitted Asset) | 3,120,609,322 | XXX | XXX | 3,120,609,322 | XXX | 2,773,244 | XXX | 10,513,626 | XXX | 14,966,869 |
| PREFERRED STOCK | | | | | | | | | | | | |
| 10. | 1 | Highest Quality | | XXX | XXX | | 0.0004 | | 0.0023 | | 0.0030 | |
| 11. | 2 | High Quality | | XXX | XXX | | 0.0019 | | 0.0058 | | 0.0090 | |
| 12. | 3 | Medium Quality | | XXX | XXX | | 0.0093 | | 0.0230 | | 0.0340 | |
| 13. | 4 | Low Quality | | XXX | XXX | | 0.0213 | | 0.0530 | | 0.0750 | |
| 14. | 5 | Lower Quality | | XXX | XXX | | 0.0432 | | 0.1100 | | 0.1700 | |
| 15. | 6 | In or Near Default | | XXX | XXX | | 0.0000 | | 0.2000 | | 0.2000 | |
| 16. | | Affiliated Life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 17. | | Total Preferred Stocks (Sum of Lines 10 through 16) (Page 2, Line 2.1, Net Admitted Asset) | | XXX | XXX | | XXX | | XXX | | XXX | |
| SHORT - TERM BONDS | | | | | | | | | | | | |
| 18. | | Exempt Obligations | 124,394,520 | XXX | XXX | 124,394,520 | 0.0000 | | 0.0000 | | 0.0000 | |
| 19. | 1 | Highest Quality | | XXX | XXX | | 0.0004 | | 0.0023 | | 0.0030 | |
| 20. | 2 | High Quality | | XXX | XXX | | 0.0019 | | 0.0058 | | 0.0090 | |
| 21. | 3 | Medium Quality | | XXX | XXX | | 0.0093 | | 0.0230 | | 0.0340 | |
| 22. | 4 | Low Quality | | XXX | XXX | | 0.0213 | | 0.0530 | | 0.0750 | |
| 23. | 5 | Lower Quality | | XXX | XXX | | 0.0432 | | 0.1100 | | 0.1700 | |
| 24. | 6 | In or Near Default | | XXX | XXX | | 0.0000 | | 0.2000 | | 0.2000 | |
| 25. | | Total Short - Term Bonds (Sum of lines 18 through 24) | 124,394,520 | XXX | XXX | 124,394,520 | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
DEFAULT COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|-------------------------------|------------------|--|-----------------------------------|--|-----------------------------------|---|--------------------|---------------------------|-------------------|---------------------------|-----------------|----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4 x 5) | 7 Factor | 8 Amount (Cols. 4 x 7) | 9 Factor | 10 Amount (Cols. 4 x 9) |
| DERIVATIVE INSTRUMENTS | | | | | | | | | | | | |
| 26. | | Exchange Traded | | XXX | XXX | | 0.0004 | | 0.0023 | | 0.0030 | |
| 27. | 1 | Highest Quality | | XXX | XXX | | 0.0004 | | 0.0023 | | 0.0030 | |
| 28. | 2 | High Quality | | XXX | XXX | | 0.0019 | | 0.0058 | | 0.0090 | |
| 29. | 3 | Medium Quality | | XXX | XXX | | 0.0093 | | 0.0230 | | 0.0340 | |
| 30. | 4 | Low Quality | | XXX | XXX | | 0.0213 | | 0.0530 | | 0.0750 | |
| 31. | 5 | Lower Quality | | XXX | XXX | | 0.0432 | | 0.1100 | | 0.1700 | |
| 32. | 6 | In or Near Default | | XXX | XXX | | 0.0000 | | 0.2000 | | 0.2000 | |
| 33. | | Total Derivative Instruments | | XXX | XXX | | XXX | | XXX | | XXX | |
| 34. | | Total (Lines 9 + 17 + 25 + 33) | 3,245,003,842 | XXX | XXX | 3,245,003,842 | XXX | 2,773,244 | XXX | 10,513,626 | XXX | 14,966,869 |
| MORTGAGE LOANS | | | | | | | | | | | | |
| In Good Standing: | | | | | | | | | | | | |
| 35. | | Farm Mortgages | | | XXX | | 0.0063 (a) | | 0.0120 (a) | | 0.0190 (a) | |
| 36. | | Residential Mortgages - Insured or Guaranteed | | | XXX | | 0.0003 | | 0.0006 | | 0.0010 | |
| 37. | | Residential Mortgages - All Other | | | XXX | | 0.0013 | | 0.0030 | | 0.0040 | |
| 38. | | Commercial Mortgages - Insured or Guaranteed | | | XXX | | 0.0003 | | 0.0006 | | 0.0010 | |
| 39. | | Commercial Mortgages - All Other | | | XXX | | 0.0063 (a) | | 0.0120 (a) | | 0.0190 (a) | |
| 40. | | In Good Standing With Restructured Terms | | | XXX | | 0.2800 (b) | | 0.6200 (b) | | 1.0000 (b) | |
| Overdue, Not in Process: | | | | | | | | | | | | |
| 41. | | Farm Mortgages | | | XXX | | 0.0420 | | 0.0760 | | 0.1200 | |
| 42. | | Residential Mortgages - Insured or Guaranteed | | | XXX | | 0.0005 | | 0.0012 | | 0.0020 | |
| 43. | | Residential Mortgages - All Other | | | XXX | | 0.0025 | | 0.0058 | | 0.0090 | |
| 44. | | Commercial Mortgages - Insured or Guaranteed | | | XXX | | 0.0005 | | 0.0012 | | 0.0020 | |
| 45. | | Commercial Mortgages - All Other | | | XXX | | 0.0420 | | 0.0760 | | 0.1200 | |
| In Process of Foreclosure: | | | | | | | | | | | | |
| 46. | | Farm Mortgages | | | XXX | | 0.0000 | | 0.1700 | | 0.1700 | |
| 47. | | Residential Mortgages - Insured or Guaranteed | | | XXX | | 0.0000 | | 0.0040 | | 0.0040 | |
| 48. | | Residential Mortgages - All Other | | | XXX | | 0.0000 | | 0.0130 | | 0.0130 | |
| 49. | | Commercial Mortgages - Insured or Guaranteed | | | XXX | | 0.0000 | | 0.0040 | | 0.0040 | |
| 50. | | Commercial Mortgages - All Other | | | XXX | | 0.0000 | | 0.1700 | | 0.1700 | |
| 51. | | Total Schedule B Mortgages (Sum of Lines 35 through 50) (Page 2, Line 3, Net Admitted Asset) | | | XXX | | XXX | | XXX | | XXX | |
| 52. | | Schedule DA Mortgages | | | XXX | | 0.0000 (c) | | 0.0000 (c) | | 0.0000 (c) | |
| 53. | | Total Mortgage Loans on Real Estate (Line 51 + 52) | | | XXX | | XXX | | XXX | | XXX | |

(a) Times the company's Experience Adjustment Factor (EAF).

(b) Column 9 is the greater of 6.4% without any EAF adjustments or a company's EAF adjusted In Good Standing (IGS) factor plus 150 basis points. Columns 5 and 7 are 28% and 62% respectively of Column 9.

(c) Determined using the same factors and breakdowns used for directly owned mortgage loans.

ASSET VALUATION RESERVE
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|--|------------------|--|-----------------------------------|--|-----------------------------------|---|--------------------|--------------------------|-------------------|---------------------------|-----------------|----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols.4 x 5) | 7 Factor | 8 Amount (Cols. 4 x 7) | 9 Factor | 10 Amount (Cols. 4 x 9) |
| COMMON STOCK | | | | | | | | | | | | |
| 1. | | Unaffiliated - Public | | XXX | XXX | | 0.0000 | | 0.1300 (d) | | 0.1300 (d) | |
| 2. | | Unaffiliated - Private | | XXX | XXX | | 0.0000 | | 0.1600 | | 0.1600 | |
| 3. | | Federal Home Loan Bank | | XXX | XXX | | 0.0000 | | 0.0050 | | 0.0080 | |
| 4. | | Affiliated - Life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| Affiliated - Investment Subsidiary: | | | | | | | | | | | | |
| 5. | | Fixed Income - Exempt Obligations | | | | | XXX | | XXX | | XXX | |
| 6. | | Fixed Income - Highest Quality | | | | | XXX | | XXX | | XXX | |
| 7. | | Fixed Income - High Quality | | | | | XXX | | XXX | | XXX | |
| 8. | | Fixed Income - Medium Quality | | | | | XXX | | XXX | | XXX | |
| 9. | | Fixed Income - Low Quality | | | | | XXX | | XXX | | XXX | |
| 10. | | Fixed Income - Lower Quality | | | | | XXX | | XXX | | XXX | |
| 11. | | Fixed Income - In/Near Default | | | | | XXX | | XXX | | XXX | |
| 12. | | Unaffiliated Common Stock - Public | | | | | 0.0000 | | 0.1300 (d) | | 0.1300 (d) | |
| 13. | | Unaffiliated Common Stock - Private | | | | | 0.0000 | | 0.1600 | | 0.1600 | |
| 14. | | Mortgage Loans | | | | | 0.0000 (c) | | 0.0000 (c) | | 0.0000 (c) | |
| 15. | | Real Estate | | | | | 0.0000 (e) | | 0.0000 (e) | | 0.0000 (e) | |
| 16. | | Affiliated - Certain Other (See SVO Purposes and Procedures Manual) | | XXX | XXX | | 0.0000 | | 0.1300 | | 0.1300 | |
| 17. | | Affiliated - All Other | | XXX | XXX | | 0.0000 | | 0.1600 | | 0.1600 | |
| 18. | | Total Common Stock (Sum of Lines 1 through 17)(Page 2, Line 2.2, Net Admitted Asset) | | | | | XXX | | XXX | | XXX | |
| REAL ESTATE | | | | | | | | | | | | |
| 19. | | Home Office Property (General Account only) | | | | | 0.0000 | | 0.0750 | | 0.0750 | |
| 20. | | Investment Properties | | | | | 0.0000 | | 0.0750 | | 0.0750 | |
| 21. | | Properties Acquired in Satisfaction of Debt | | | | | 0.0000 | | 0.1100 | | 0.1100 | |
| 22. | | Total Real Estate (Sum of Lines 19 through 21) | | | | | XXX | | XXX | | XXX | |
| OTHER INVESTED ASSETS | | | | | | | | | | | | |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF BONDS | | | | | | | | | | | | |
| 23. | | Exempt Obligations | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 24. | 1 | Highest Quality | | XXX | XXX | | 0.0004 | | 0.0023 | | 0.0030 | |
| 25. | 2 | High Quality | | XXX | XXX | | 0.0019 | | 0.0058 | | 0.0090 | |
| 26. | 3 | Medium Quality | | XXX | XXX | | 0.0093 | | 0.0230 | | 0.0340 | |
| 27. | 4 | Low Quality | | XXX | XXX | | 0.0213 | | 0.0530 | | 0.0750 | |
| 28. | 5 | Lower Quality | | XXX | XXX | | 0.0432 | | 0.1100 | | 0.1700 | |
| 29. | 6 | In or Near Default | | XXX | XXX | | 0.0000 | | 0.2000 | | 0.2000 | |
| 30. | | Total with Bond characteristics (Sum of Lines 23 through 29) | | XXX | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|---|------------------|---|-----------------------------------|--|-----------------------------------|---|--------------------|---------------------------|-------------------|---------------------------|-----------------|----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols. 4 x 5) | 7 Factor | 8 Amount (Cols. 4 x 7) | 9 Factor | 10 Amount (Cols. 4 x 9) |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF PREFERRED STOCKS | | | | | | | | | | | | |
| 31. | 1 | Highest Quality | 3,525,895 | XXX | XXX | 3,525,895 | 0.0004 | 1,410 | 0.0023 | 8,110 | 0.0030 | 10,578 |
| 32. | 2 | High Quality | | XXX | XXX | | 0.0019 | | 0.0058 | | 0.0090 | |
| 33. | 3 | Medium Quality | | XXX | XXX | | 0.0093 | | 0.0230 | | 0.0340 | |
| 34. | 4 | Low Quality | | XXX | XXX | | 0.0213 | | 0.0530 | | 0.0750 | |
| 35. | 5 | Lower Quality | | XXX | XXX | | 0.0432 | | 0.1100 | | 0.1700 | |
| 36. | 6 | In or Near Default | | XXX | XXX | | 0.0000 | | 0.2000 | | 0.2000 | |
| 37. | | Affiliated Life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 38. | | Total with Preferred Stock characteristics (Sum of Lines 31 through 37) | 3,525,895 | XXX | XXX | 3,525,895 | XXX | 1,410 | XXX | 8,110 | XXX | 10,578 |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF MORTGAGE LOANS | | | | | | | | | | | | |
| In Good Standing: | | | | | | | | | | | | |
| 39. | | Farm Mortgages | | | XXX | | 0.0063 (a) | | 0.0120 (a) | | 0.0190 (a) | |
| 40. | | Residential Mortgages - Insured or Guaranteed | | | XXX | | 0.0003 | | 0.0006 | | 0.0010 | |
| 41. | | Residential Mortgages - All Other | | XXX | XXX | | 0.0013 | | 0.0030 | | 0.0040 | |
| 42. | | Commercial Mortgages - Insured or Guaranteed | | | XXX | | 0.0003 | | 0.0006 | | 0.0010 | |
| 43. | | Commercial Mortgages - All Other | | | XXX | | 0.0063 (a) | | 0.0120 (a) | | 0.0190 (a) | |
| 44. | | In Good Standing With Restructured Terms | | | XXX | | 0.2800 (b) | | 0.6200 (b) | | 1.0000 (b) | |
| Overdue, Not in Process: | | | | | | | | | | | | |
| 45. | | Farm Mortgages | | | XXX | | 0.0420 | | 0.0760 | | 0.1200 | |
| 46. | | Residential Mortgages - Insured or Guaranteed | | | XXX | | 0.0005 | | 0.0012 | | 0.0020 | |
| 47. | | Residential Mortgages - All Other | | | XXX | | 0.0025 | | 0.0058 | | 0.0090 | |
| 48. | | Commercial Mortgages - Insured or Guaranteed | | | XXX | | 0.0005 | | 0.0012 | | 0.0020 | |
| 49. | | Commercial Mortgages - All Other | | | XXX | | 0.0420 | | 0.0760 | | 0.1200 | |
| In Process of Foreclosure: | | | | | | | | | | | | |
| 50. | | Farm Mortgages | | | XXX | | 0.0000 | | 0.1700 | | 0.1700 | |
| 51. | | Residential Mortgages - Insured or Guaranteed | | | XXX | | 0.0000 | | 0.0040 | | 0.0040 | |
| 52. | | Residential Mortgages - All Other | | | XXX | | 0.0000 | | 0.0130 | | 0.0130 | |
| 53. | | Commercial Mortgages - Insured or Guaranteed | | | XXX | | 0.0000 | | 0.0040 | | 0.0040 | |
| 54. | | Commercial Mortgages - All Other | | | XXX | | 0.0000 | | 0.1700 | | 0.1700 | |
| 55. | | Total with Mortgage Loan Characteristics (Sum of Lines 39 through 54) | | | XXX | | XXX | | XXX | | XXX | |

ASSET VALUATION RESERVE (Continued)
BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS
EQUITY AND OTHER INVESTED ASSET COMPONENT

| Line Number | NAIC Designation | Description | 1 Book/Adjusted Carrying Value | 2 Reclassify Related Party Encumbrances | 3 Add Third Party Encumbrances | 4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3) | Basic Contribution | | Reserve Objective | | Maximum Reserve | |
|---|------------------|--|-----------------------------------|--|-----------------------------------|---|--------------------|--------------------------|-------------------|---------------------------|-----------------|----------------------------|
| | | | | | | | 5 Factor | 6 Amount (Cols.4 x 5) | 7 Factor | 8 Amount (Cols. 4 x 7) | 9 Factor | 10 Amount (Cols. 4 x 9) |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF COMMON STOCK | | | | | | | | | | | | |
| 56. | | Unaffiliated Public | | XXX | XXX | | 0.0000 | | 0.1300 (d) | | 0.1300 (d) | |
| 57. | | Unaffiliated Private | | XXX | XXX | | 0.0000 | | 0.1600 | | 0.1600 | |
| 58. | | Affiliated Life with AVR | | XXX | XXX | | 0.0000 | | 0.0000 | | 0.0000 | |
| 59. | | Affiliated Certain Other (See SVO Purposes & Procedures Manual) | | XXX | XXX | | 0.0000 | | 0.1300 | | 0.1300 | |
| 60. | | Affiliated Other – All Other | | XXX | XXX | | 0.0000 | | 0.1600 | | 0.1600 | |
| 61. | | Total with Common Stock characteristics (Sum of Lines 56 through 60) | | XXX | XXX | | XXX | | XXX | | XXX | |
| INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF REAL ESTATE | | | | | | | | | | | | |
| 62. | | Home Office Property (General Account only) | | | | | 0.0000 | | 0.0750 | | 0.0750 | |
| 63. | | Investment Properties | | | | | 0.0000 | | 0.0750 | | 0.0750 | |
| 64. | | Properties Acquired in Satisfaction of Debt | | | | | 0.0000 | | 0.1100 | | 0.1100 | |
| 65. | | Total with Real Estate Characteristics (Lines 62 through 64) | | | | | XXX | | XXX | | XXX | |
| LOW INCOME HOUSING TAX CREDIT INVESTMENTS | | | | | | | | | | | | |
| 66. | | Guaranteed Federal Low Income Housing Tax Credit | | | | | 0.0003 | | 0.0006 | | 0.0010 | |
| 67. | | Non-guaranteed Federal Low Income Housing Tax Credit | | | | | 0.0063 | | 0.0120 | | 0.0190 | |
| 68. | | State Low Income Housing Tax Credit | | | | | 0.0273 | | 0.0600 | | 0.0975 | |
| 69. | | All Other Low Income Housing Tax Credit | | | | | 0.0273 | | 0.0600 | | 0.0975 | |
| 70. | | Total LIHTC | | | | | XXX | | XXX | | XXX | |
| ALL OTHER INVESTMENTS | | | | | | | | | | | | |
| 71. | | Other Invested Assets – Schedule BA | | XXX | | | 0.0000 | | 0.1300 | | 0.1300 | |
| 72. | | Other Short-Term Invested Assets - Schedule DA | | XXX | | | 0.0000 | | 0.1300 | | 0.1300 | |
| 73. | | Total All Other (Sum of Lines 71 + 72) | | XXX | | | XXX | | XXX | | XXX | |
| 74. | | Total Other Invested Assets - Schedules BA & DA (Sum of Lines 30, 38, 55, 61, 65, 70 and 73) | 3,525,895 | | | 3,525,895 | XXX | 1,410 | XXX | 8,110 | XXX | 10,578 |

(a) Times the company's experience adjustment factor (EAF).

(b) Column 9 is the greater of 6.4% without any EAF adjustments or a company's EAF adjusted In Good Standing (IGS) factor plus 150 basis points. Columns 5 and 7 are 28% and 62% respectively of Column 9.

(c) Determined using the same factors and breakdowns used for directly owned mortgage loans.

(d) Times the company's weighted average portfolio beta (Minimum .10, Maximum .20).

(e) Determined using the same factors and breakdowns used for directly owned real estate.

ASSET VALUATION RESERVE (Continued)

BASIC CONTRIBUTION, RESERVE OBJECTIVE AND MAXIMUM RESERVE CALCULATIONS REPLICATIONS (SYNTHETIC) ASSETS

| 1 RSAT Number | 2 Type | 3 CUSIP | 4 Description of Asset(s) | 5 NAIC Designation or Other Description of Asset | 6 Value of Asset | 7 AVR Basic Contribution | 8 AVR Reserve Objective | 9 AVR Maximum Reserve |
|------------------|-----------|------------|------------------------------|--|---------------------|--------------------------------|-------------------------------|-----------------------------|
| NONE | | | | | | | | |
| 0599999 - Total | | | | | | | | |

Overflow Page for Write-ins

NONE

Schedule A - Verification - Real Estate

NONE

Schedule B - Verification Mortgage Loans

NONE

SCHEDULE BA - VERIFICATION BETWEEN YEARS

Other Long-Term Invested Assets

| | | |
|-----|--|-----------|
| 1. | Book/adjusted carrying value, December 31 of prior year | 3,526,660 |
| 2. | Cost of acquired: | |
| | 2.1 Actual cost at time of acquisition (Part 2, Column 8) | |
| | 2.2 Additional investment made after acquisition (Part 2, Column 9) | |
| 3. | Capitalized deferred interest and other: | |
| | 3.1 Totals, Part 1, Column 16 | |
| | 3.2 Totals, Part 3, Column 12 | |
| 4. | Accrual of discount | 362 |
| 5. | Unrealized valuation increase (decrease): | |
| | 5.1 Totals, Part 1, Column 13 | |
| | 5.2 Totals, Part 3, Column 9 | |
| 6. | Total gain (loss) on disposals, Part 3, Column 19 | |
| 7. | Deduct amounts received on disposals, Part 3, Column 16 | |
| 8. | Deduct amortization of premium and depreciation | 1,127 |
| 9. | Total foreign exchange change in book/adjusted carrying value: | |
| | 9.1 Totals, Part 1, Column 17 | |
| | 9.2 Totals, Part 3, Column 14 | |
| 10. | Deduct current year's other than temporary impairment recognized: | |
| | 10.1 Totals, Part 1, Column 15 | |
| | 10.2 Totals, Part 3, Column 11 | |
| 11. | Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10) | 3,525,895 |
| 12. | Deduct total nonadmitted amounts | |
| 13. | Statement value at end of current period (Line 11 minus Line 12) | 3,525,895 |

SCHEDULE D - VERIFICATION BETWEEN YEARS

Bonds and Stocks

| | | |
|-----|---|---------------|
| 1. | Book/adjusted carrying value, December 31 of prior year | 3,640,975,314 |
| 2. | Cost of bonds and stocks acquired, Part 3, Column 7 | 1,206,746,703 |
| 3. | Accrual of discount | 5,258,717 |
| 4. | Unrealized valuation increase (decrease): | |
| | 4.1. Part 1, Column 12 | |
| | 4.2. Part 2, Section 1, Column 15 | |
| | 4.3. Part 2, Section 2, Column 13 | 143,384,323 |
| | 4.4. Part 4, Column 11 | 125,438,028 |
| | | 268,822,351 |
| 5. | Total gain (loss) on disposals, Part 4, Column 19 | (103,976,339) |
| 6. | Deduction consideration for bonds and stocks disposed of, Part 4, Column 7 | 1,045,765,392 |
| 7. | Deduct amortization of premium | 7,617,729 |
| 8. | Total foreign exchange change in book/adjusted carrying value: | |
| | 8.1. Part 1, Column 15 | |
| | 8.2. Part 2, Section 1, Column 19 | |
| | 8.3. Part 2, Section 2, Column 16 | |
| | 8.4. Part 4, Column 15 | |
| 9. | Deduct current year's other than temporary impairment recognized: | |
| | 9.1. Part 1, Column 14 | 2,239,017 |
| | 9.2. Part 2, Section 1, Column 17 | |
| | 9.3. Part 2, Section 2, Column 14 | |
| | 9.4. Part 4, Column 13 | 1,573,229 |
| | | 3,812,246 |
| 10. | Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) | 3,960,631,379 |
| 11. | Deduct total nonadmitted amounts | |
| 12. | Statement value at end of current period (Line 10 minus Line 11) | 3,960,631,379 |

SCHEDULE D - SUMMARY BY COUNTRY

Long-Term Bonds and Stocks OWNED December 31 of Current Year

| Description | | 1 Book/Adjusted Carrying Value | 2 Fair Value | 3 Actual Cost | 4 Par Value of Bonds |
|---|----------------------------|--------------------------------------|-----------------|------------------|-------------------------|
| BONDS | | | | | |
| Governments (Including all obligations guaranteed by governments) | 1. United States | 176,243,147 | 176,839,230 | 176,002,245 | 169,899,161 |
| | 2. Canada | | | | |
| | 3. Other Countries | | | | |
| | 4. Totals | 176,243,147 | 176,839,230 | 176,002,245 | 169,899,161 |
| U.S. States, Territories and Possessions (Direct and guaranteed) | 5. Totals | 7,031,447 | 6,993,087 | 7,050,017 | 7,030,000 |
| U.S. Political Subdivisions of States, Territories and Possessions (Direct and guaranteed) | 6. Totals | 6,783,139 | 6,892,678 | 6,782,837 | 6,785,000 |
| U.S. Special revenue and special assessment obligations and all non- guaranteed obligations of agencies and authorities of governments and their political subdivisions | 7. Totals | 953,160,115 | 980,791,954 | 953,100,251 | 947,593,547 |
| Industrial and Miscellaneous, Credit Tenant Loans and Hybrid Securities (unaffiliated) | 8. United States | 1,695,030,398 | 1,707,285,341 | 1,712,225,718 | 1,672,410,582 |
| | 9. Canada | 43,475,981 | 46,805,864 | 44,834,841 | 40,350,000 |
| | 10. Other Countries | 238,885,096 | 246,802,721 | 239,623,687 | 242,295,000 |
| | 11. Totals | 1,977,391,475 | 2,000,893,926 | 1,996,684,246 | 1,955,055,582 |
| Parent, Subsidiaries and Affiliates | 12. Totals | | | | |
| | 13. Total Bonds | 3,120,609,323 | 3,172,410,875 | 3,139,619,596 | 3,086,363,290 |
| PREFERRED STOCKS | | | | | |
| Industrial and Miscellaneous (unaffiliated) | 14. United States | | | | |
| | 15. Canada | | | | |
| | 16. Other Countries | | | | |
| | 17. Totals | | | | |
| Parent, Subsidiaries and Affiliates | 18. Totals | | | | |
| | 19. Total Preferred Stocks | | | | |
| COMMON STOCKS | | | | | |
| Industrial and Miscellaneous (unaffiliated) | 20. United States | 840,022,056 | 840,022,056 | 924,844,079 | |
| | 21. Canada | | | | |
| | 22. Other Countries | | | | |
| | 23. Totals | 840,022,056 | 840,022,056 | 924,844,079 | |
| Parent, Subsidiaries and Affiliates | 24. Totals | | | | |
| | 25. Total Common Stocks | 840,022,056 | 840,022,056 | 924,844,079 | |
| | 26. Total Stocks | 840,022,056 | 840,022,056 | 924,844,079 | |
| | 27. Total Bonds and Stocks | 3,960,631,379 | 4,012,432,931 | 4,064,463,675 | |

SCHEDULE DA - VERIFICATION BETWEEN YEARS

Short-Term Investments

| | 1 | 2 | 3 | 4 | 5 |
|---|-------------|-------------|----------------|--|--|
| | Total | Bonds | Mortgage Loans | Other Short-term Investment Assets (a) | Investments in Parent, Subsidiaries and Affiliates |
| 1. Book/adjusted carrying value, December 31 of prior year | 46,286,862 | 46,286,862 | | | |
| 2. Cost of short-term investments acquired | 946,698,542 | 946,698,542 | | | |
| 3. Accrual of discount | | | | | |
| 4. Unrealized valuation increase (decrease) | | | | | |
| 5. Total gain (loss) on disposals | | | | | |
| 6. Deduct consideration received on disposals | 868,590,884 | 868,590,884 | | | |
| 7. Deduct amortization of premium | | | | | |
| 8. Total foreign exchange change in book/adjusted carrying value | | | | | |
| 9. Deduct current year's other than temporary impairment recognized | | | | | |
| 10. Book adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) | 124,394,520 | 124,394,520 | | | |
| 11. Deduct total nonadmitted amounts | | | | | |
| 12. Statement value at end of current period (Line 10 minus Line 11) | 124,394,520 | 124,394,520 | | | |

(a) Indicate the category of such assets, for example, joint ventures, transportation equipment:

Schedule DB - Part A - Verification - Options, Caps, Floors and Insurance Futures Options Owned

N O N E

Schedule DB - Part B - Verification - Options, Caps, Floors and Insurance Futures Options Written

N O N E

Schedule DB - Part C - Verification - Swaps and Forwards

N O N E

Schedule DB - Part D - Verification - Futures Contracts and Insurance Futures Contracts

N O N E

Schedule DB - Part E - Verification - Statement Value and Fair Value of Open Contracts

N O N E

Schedule DB - Part F - Section 1 - Replicated (Synthetic) Assets Open

N O N E

Schedule DB - Part F - Section 2 - Reconciliation of Replicated (Synthetic) Assets Open

N O N E

Schedule E - Verification - Cash Equivalents

N O N E

Schedule A - Part 1 - Real Estate Owned

N O N E

Schedule A - Part 2 - Real Estate Acquired and Additions Made

N O N E

Schedule A - Part 3 - Real Estate Disposed

N O N E

Schedule B - Part 1 - Mortgage Loans Owned

N O N E

Schedule B - Part 2 - Mortgage Loans Acquired and Additions Made

N O N E

Schedule B - Part 3 - Mortgage Loans Disposed, Transferred or Repaid

N O N E

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE BA - PART 1

Showing Other Long-Term Invested Assets OWNED December 31 of Current Year

| 1 CUSIP Identi- fication | 2 Name or Description | 3 Code | 4 Location | | 6 Name of Vendor or General Partner | 7 NAIC Designation | 8 Date Originally Acquired | 9 Type and Strategy | 10 Actual Cost | 11 Fair Value | 12 Book/ Adjusted Carrying Value Less Encum- brances | Change in Book/Adjusted Carrying Value | | | | | 18 Invest- ment Income | 19 Commit- ment for Additional Invest- ment | 20 Percent- age of Owner- ship |
|---|--|-----------|------------|------------|---|--------------------------|-------------------------------------|------------------------------|----------------------|---------------------|---|---|---|--|--|---|---------------------------------|---|--|
| | | | 4 City | 5 State | | | | | | | | 13 Unrealized Valuation Increase (Decrease) | 14 Current Year's (Depre- ciation) or (Amorti- zation)/ Accretion | 15 Current Year's Other Than Temporary Impair- ment Recogn- ized | 16 Capital- ized Deferred Interest and Other | 17 Total Foreign Exchange Change in Book/ Adjusted Carrying Value | | | |
| 29452P-AB-2 | EQUITABLE LIFE ASSURANCE SURPLUS NTS 144A 7.700% 12/01/15 | | | | Various | .1FE | 08/09/1999 | | 3,531,038 | 3,842,108 | 3,525,895 | | (765) | | | | 271,040 | | 0.000 |
| 2199999. Surplus Debentures, etc - Unaffiliated | | | | | | | | | 3,531,038 | 3,842,108 | 3,525,895 | | (765) | | | 271,040 | | XXX | |
| 3999999. Total - Unaffiliated | | | | | | | | | 3,531,038 | 3,842,108 | 3,525,895 | | (765) | | | 271,040 | | XXX | |
| 4099999. Total - Affiliated | | | | | | | | | | | | | | | | | | XXX | |
| 4199999 - Totals | | | | | | | | | 3,531,038 | 3,842,108 | 3,525,895 | | (765) | | | 271,040 | | XXX | |

E07

Schedule BA - Part 2 - Other Long-Term Invested Assets Acquired and Additions Made

N O N E

Schedule BA - Part 3 - Other Long-Term Invested Assets Disposed, Transferred or Repaid

N O N E

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 1

Showing All Long-Term BONDS Owned December 31 of Current Year

| 1 | 2 | Codes | | | 6 | 7 | Fair Value | | 10 | 11 | Change in Book/Adjusted Carrying Value | | | | Interest | | | | | Dates | |
|----------------------|--|---------|---------------|-----------------|-----------|---------------|--------------------------------|---------------|---------------|-------------------------------|---|--|---|--|----------|-------------------|-----------|---------------------------------|-----------------------------|------------|------------|
| | | 3 | 4 | 5 | | | 8 | 9 | | | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 |
| CUSIP Identification | Description | C o d e | F o r e i g n | B o n d C h a r | NAIC Des. | Actual Cost | Rate Used to Obtain Fair Value | Fair Value | Par Value | Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ (Decrease) | Current Year's (Amor-tization) Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Rate of | Effective Rate of | When Paid | Admitted Amount Due and Accrued | Amount Received During Year | Acquired | Maturity |
| 201730-AE-1 | GREENWICH CAPITAL COMMERCIAL F SERIES 2007G69 CLASS A4 | | | 2 | .1FE | 14,987,986 | .883550 | 13,827,479 | 15,650,000 | 15,092,594 | | 60,239 | | | 5.444 | 6.126 | MON | 70,999 | 851,986 | 05/30/2008 | 03/10/2039 |
| 55264T-DE-8 | MBNA CREDIT CARD MASTER NOTE 2005-A6 MORGAN STANLEY CAPITAL I SERIES 20071016 CLASS A4 | | | 2 | .1FE | 3,909,375 | .1020240 | 4,080,972 | 4,000,000 | 3,980,365 | | 30,352 | | | 4.500 | 5.362 | MON | 8,000 | 180,000 | 07/20/2007 | 01/15/2013 |
| 61756U-AE-1 | | | | 2 | .1FE | 7,126,209 | .852050 | 6,160,307 | 7,230,000 | 7,137,767 | | 8,114 | | | 5.809 | 6.066 | MON | 34,999 | 419,991 | 07/16/2008 | 12/12/2049 |
| 921796-HC-5 | VANDERBILT MORTGAGE FINANCE 1999-C IA5 (CMO-MH) | | | 2 | .1FE | 3,000,000 | .963290 | 2,889,858 | 3,000,000 | 3,000,000 | | | | | 8.005 | 8.128 | MON | 20,013 | 240,150 | 08/18/1999 | 10/07/2029 |
| 3799999 | Industrial and Miscellaneous (Unaffiliated) - Other Multi-Class Commercial Mortgage-Backed/Asset-Backed Securities | | | | | 61,586,290 | XXX | 60,948,415 | 62,650,370 | 61,834,679 | | 272,434 | | | XXX | XXX | XXX | 247,434 | 3,466,065 | XXX | XXX |
| 3899999 | Total - Industrial and Miscellaneous (Unaffiliated) Bonds | | | | | 1,956,891,858 | XXX | 1,969,779,544 | 1,917,194,582 | 1,937,830,735 | | (2,556,787) | 2,239,017 | | XXX | XXX | XXX | 26,923,497 | 100,879,326 | XXX | XXX |
| 4199999 | Total - Credit Tenant Loans | | | | | | XXX | | | | | | | | XXX | XXX | XXX | | | XXX | XXX |
| 06605H-AA-6 | BANKAMERICA CORP CAP NOTES 144A | | | 1 | .3FE | 1,068,080 | .980000 | 980,000 | 1,000,000 | 1,028,234 | | (4,035) | | | 8.070 | 7.342 | JD | 224 | 80,700 | 01/30/1998 | 12/31/2010 |
| 17305H-AA-6 | CITIGROUP CAPITAL III | | | | .3FE | 497,109 | .747590 | 373,796 | 500,000 | 497,404 | | 29 | | | 7.625 | 7.671 | JD | 3,177 | 38,125 | 10/14/1998 | 12/01/2036 |
| 302570-AW-6 | FPL GROUP CAPITAL | | | 1 | .1FE | 11,339,443 | .925000 | 10,314,675 | 11,151,000 | 11,297,100 | | (17,041) | | | 6.350 | 6.110 | AO | 177,022 | 708,089 | 05/08/2007 | 10/01/2016 |
| 404270-AA-1 | HSBC AMERICAS INC CAP SEC II 144A | | | 1 | .1FE | 3,378,957 | .955040 | 3,113,424 | 3,260,000 | 3,326,722 | | (2,603) | | | 8.380 | 8.007 | MN | 34,907 | 92,180 | 10/29/1997 | 05/15/2017 |
| 481227-AA-4 | JPMC CAPITAL XVIII | | | | .1FE | 6,596,921 | .971530 | 5,974,928 | 6,150,000 | 6,582,245 | | (6,068) | | | 6.950 | 6.397 | FA | 159,097 | 427,425 | 04/20/2007 | 08/17/2036 |
| 638611-AA-1 | NATIONWIDE FINL SERV CAP NOTES | | | | .2FE | 15,186,038 | .632490 | 8,728,307 | 13,800,000 | 15,068,343 | | (15,047) | | | 7.899 | 7.129 | MS | 363,354 | 1,090,062 | 02/03/1999 | 03/01/2037 |
| 69331V-AA-4 | PECO ENERGY CAP TRST III | | | | .2FE | 1,725,840 | .814630 | 1,629,252 | 2,000,000 | 1,760,692 | | 5,235 | | | 7.380 | 8.700 | AO | 25,010 | 147,600 | 10/20/2000 | 04/06/2028 |
| 4299999 | Hybrid Securities - Issuer Obligations | | | | | 39,792,388 | XXX | 31,114,382 | 37,861,000 | 39,560,740 | | (39,530) | | | XXX | XXX | XXX | 762,791 | 2,584,181 | XXX | XXX |
| 4899999 | Total - Hybrid Securities | | | | | 39,792,388 | XXX | 31,114,382 | 37,861,000 | 39,560,740 | | (39,530) | | | XXX | XXX | XXX | 762,791 | 2,584,181 | XXX | XXX |
| 5599999 | Total - Parent, Subsidiaries and Affiliates Bonds | | | | | | XXX | | | | | | | | XXX | XXX | XXX | | | XXX | XXX |
| 7799999 | Total - Issuer Obligations | | | | | 1,601,511,416 | XXX | 1,621,688,242 | 1,550,590,999 | 1,581,276,187 | | (3,362,301) | | | XXX | XXX | XXX | 26,492,792 | 82,432,149 | XXX | XXX |
| 7899999 | Total - Single Class Mortgage-Backed/Asset-Backed Securities | | | | | 776,744,931 | XXX | 788,210,862 | 759,761,445 | 776,237,867 | | (194,718) | | | XXX | XXX | XXX | 3,059,236 | 20,409,286 | XXX | XXX |
| 7999999 | Total - Defined Multi-Class Residential Mortgage-Backed Securities | | | | | 386,555,513 | XXX | 397,881,316 | 391,841,418 | 386,914,378 | | 244,676 | (65,660) | | XXX | XXX | XXX | 1,724,789 | 19,776,676 | XXX | XXX |
| 8099999 | Total - Other Multi-Class Residential Mortgage-Backed Securities | | | | | 68,261,194 | XXX | 57,513,309 | 71,625,788 | 68,546,584 | | 219,532 | 2,304,677 | | XXX | XXX | XXX | 335,037 | 4,023,029 | XXX | XXX |
| 8199999 | Total - Defined Multi-Class Commercial Mortgage-Backed Securities | | | | | 244,960,252 | XXX | 246,168,731 | 249,893,270 | 245,799,628 | | 367,014 | | | XXX | XXX | XXX | 983,927 | 12,320,431 | XXX | XXX |
| 8299999 | Total - Other Multi-Class Commercial Mortgage-Backed/Asset-Backed Securities | | | | | 61,586,290 | XXX | 60,948,415 | 62,650,370 | 61,834,679 | | 272,434 | | | XXX | XXX | XXX | 247,434 | 3,466,065 | XXX | XXX |
| 8399999 | Total Bonds | | | | | 3,139,619,596 | XXX | 3,172,410,875 | 3,086,363,290 | 3,120,609,323 | | (2,453,363) | 2,239,017 | | XXX | XXX | XXX | 32,843,215 | 142,427,636 | XXX | XXX |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 2 - SECTION 1

Showing All PREFERRED STOCKS Owned December 31 of Current Year

| 1 CUSIP Identi- fication | 2 Description | Codes | | 5 Number of Shares | 6 Par Value Per Share | 7 Rate Per Share | 8 Book/ Adjusted Carrying Value | Fair Value | | 11 Actual Cost | Dividends | | | Change in Book/Adjusted Carrying Value | | | | 20 NAIC Desig- nation | 21 Date Acquired | |
|-----------------------------------|------------------------|-----------|-------------------|-----------------------------|-----------------------------------|---------------------------|---|---|------------------|-------------------|------------------------------|---|---|--|---|--|---|--------------------------------|------------------------|---|
| | | 3 Code | 4 For- eign | | | | | 9 Rate Per Share Used to Obtain Fair Value | 10 Fair Value | | 12 Declared but Unpaid | 13 Amount Received During Year | 14 Nonadmitted Declared But Unpaid | 15 Unrealized Valuation Increase/ (Decrease) | 16 Current Year's (Amor- tization) Accretion | 17 Current Year's Other Than Temporary Impairment Recognized | 18 Total Change in Book/Adjusted Carrying Value (15 + 16 - 17) | | | 19 Total Foreign Exchange Change in Book/ Adjusted Carrying Value |
| NONE | | | | | | | | | | | | | | | | | | | | |
| 8999999 | Total Preferred Stocks | | | | | | | XXX | | | | | | | | | | | XXX | XXX |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 2 - SECTION 2

Showing All COMMON STOCKS Owned December 31 of Current Year

| 1 | 2 | Codes | | 5 | 6 | Fair Value | | 9 | Dividends | | | Change in Book/Adjusted Carrying Value | | | | 17 | 18 |
|----------------------|--------------------------------|-------|---------|------------------|------------------------------|--|------------|-------------|---------------------|-----------------------------|---------------------------------|--|---|--|---|---------------------------|---------------|
| | | 3 | 4 | | | 7 | 8 | | 10 | 11 | 12 | 13 | 14 | 15 | 16 | | |
| CUSIP Identification | Description | Code | Foreign | Number of Shares | Book/Adjusted Carrying Value | Rate Per Share Used to Obtain Fair Value | Fair Value | Actual Cost | Declared but Unpaid | Amount Received During Year | Nonadmitted Declared But Unpaid | Unrealized Valuation Increase/(Decrease) | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (13 - 14) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | NAIC Market Indicator (a) | Date Acquired |
| 008892-10-1 | AIM VI Capital Appreciation I | | | 375,797,000 | 7,639,944 | 20.330 | 7,639,944 | 9,353,354 | | 43,490 | | 1,264,243 | | 1,264,243 | | L | 12/31/2009 |
| 008892-41-6 | AIM VI Global Health Car Ser I | | | 48,949,000 | 776,817 | 15.870 | 776,817 | 825,826 | | 2,423 | | 161,614 | | 161,614 | | L | 12/31/2009 |
| 008892-50-7 | AIM VI International Growth I | | | 202,704,000 | 5,272,334 | 26.010 | 5,272,334 | 5,328,723 | | 68,751 | | 1,196,593 | | 1,196,593 | | L | 12/31/2009 |
| 008892-52-3 | AIM VI Glob Real Estate Ser I | | | 1,223,455,000 | 14,852,743 | 12.140 | 14,852,743 | 18,355,189 | | | | 3,603,020 | | 3,603,020 | | L | 12/31/2009 |
| 008892-53-1 | AIM VI Sm Cap Equity Fd Ser II | | | 5,670,000 | 71,957 | 12.690 | 71,957 | 60,465 | | 87 | | 15,464 | | 15,464 | | L | 12/31/2009 |
| 008892-65-5 | AIM VI International Growth II | | | 573,764,000 | 14,705,574 | 25.630 | 14,705,574 | 13,801,428 | | 173,325 | | 3,171,767 | | 3,171,767 | | L | 12/31/2009 |
| 008892-74-7 | AIM VI Cap Development Ser II | | | 87,608,000 | 962,811 | 10.990 | 962,811 | 1,013,830 | | | | 251,866 | | 251,866 | | L | 12/31/2009 |
| 008892-75-4 | AIM VI Capital Appreciation II | | | 101,205,000 | 2,024,104 | 20.000 | 2,024,104 | 1,924,221 | | 4,947 | | 333,173 | | 333,173 | | L | 12/31/2009 |
| 008892-85-3 | AIM VI Cap Development Ser I | | | 56,406,000 | 636,819 | 11.290 | 636,819 | 743,573 | | | | 179,949 | | 179,949 | | L | 12/31/2009 |
| 024936-10-6 | American Century Value | | | 1,236,960,000 | 6,531,150 | 5.280 | 6,531,150 | 7,216,881 | | 248,951 | | 857,131 | | 857,131 | | L | 12/31/2009 |
| 024936-20-5 | American Century International | | | 2,313,908,000 | 17,886,510 | 7.730 | 17,886,510 | 20,480,723 | | 261,020 | | 4,141,149 | | 4,141,149 | | L | 12/31/2009 |
| 024936-40-3 | American Century Balanced | | | 4,511,016,000 | 25,938,345 | 5.750 | 25,938,345 | 28,359,738 | | 928,383 | | 1,949,248 | | 1,949,248 | | L | 12/31/2009 |
| 024936-75-9 | American Century Large Co Val | | | 147,211,000 | 1,268,962 | 8.620 | 1,268,962 | 1,108,957 | | 36,111 | | 230,219 | | 230,219 | | L | 12/31/2009 |
| 024936-85-8 | American Century VP Ultra II | | | 27,682,000 | 222,563 | 8.040 | 222,563 | 202,680 | | 156 | | 47,941 | | 47,941 | | L | 12/31/2009 |
| 024936-88-2 | American Century VP Ultra CI I | | | 89,035,000 | 722,961 | 8.120 | 722,961 | 800,022 | | 1,437 | | 174,813 | | 174,813 | | L | 12/31/2009 |
| 025077-20-9 | American Century Inflat Protec | | | 752,183,000 | 8,070,920 | 10.730 | 8,070,920 | 7,804,107 | | 119,240 | | 479,604 | | 479,604 | | L | 12/31/2009 |
| 025077-30-8 | Amer Cent VP Inflation Protect | | | 6,953,000 | 74,673 | 10.740 | 74,673 | 73,793 | | 584 | | 1,482 | | 1,482 | | L | 12/31/2009 |
| 233386-40-6 | DWS Captial Growth VIP B | | | 94,593,000 | 1,594,834 | 16.860 | 1,594,834 | 1,396,224 | | 6,381 | | 277,601 | | 277,601 | | L | 12/31/2009 |
| 233386-60-4 | DWS Global Opportunities B | | | 5,148,000 | 57,194 | 11.110 | 57,194 | 54,231 | | 69 | | 2,963 | | 2,963 | | L | 12/31/2009 |
| 233386-85-1 | DWS International VIP B | | | 9,116,000 | 75,295 | 8.260 | 75,295 | 104,567 | | 2,556 | | 16,086 | | 16,086 | | L | 04/23/2009 |
| 233386-86-9 | DWS International VIP A | | | 1,390,790,000 | 11,487,928 | 8.260 | 11,487,928 | 16,270,677 | | 394,908 | | 2,450,949 | | 2,450,949 | | L | 12/31/2009 |
| 23338H-68-5 | DWS Balanced VIP A | | | 1,069,619,000 | 21,948,577 | 20.520 | 21,948,577 | 24,635,785 | | 678,181 | | 3,433,734 | | 3,433,734 | | L | 12/31/2009 |
| 23338H-79-2 | DWS VIP Money Market CI A | | | 39,646,000 | 39,646 | 1.000 | 39,646 | 39,646 | | 62 | | | | | | L | 12/15/2009 |
| 23338H-80-0 | DWS Global Thematic B | | | 3,625,000 | 29,907 | 8.250 | 29,907 | 25,089 | | 57 | | 4,600 | | 4,600 | | L | 12/09/2009 |
| 23339F-40-7 | DWS Small Cap Index A | | | 5,926,000 | 58,666 | 9.900 | 58,666 | 53,603 | | 1,697 | | 8,840 | | 8,840 | | L | 11/02/2009 |
| 261976-60-9 | Dreyfus Quality Bond | | | 1,112,619,000 | 12,327,815 | 11.080 | 12,327,815 | 12,124,911 | | 502,391 | | 1,014,564 | | 1,014,564 | | L | 12/31/2009 |
| 261976-80-7 | Dreyfus Appreciation | | | 252,529,000 | 7,929,415 | 31.400 | 7,929,415 | 8,847,597 | | 609,259 | | 841,988 | | 841,988 | | L | 12/31/2009 |
| 262014-20-2 | Dreyfus Stock Index | | | 1,016,990,000 | 26,787,518 | 26.340 | 26,787,518 | 29,473,533 | | 1,425,158 | | 3,869,273 | | 3,869,273 | | L | 12/31/2009 |
| 26201X-10-9 | Dreyfus Socially Responsible | | | 224,151,000 | 5,886,195 | 26.260 | 5,886,195 | 5,631,025 | | 36,699 | | 1,356,439 | | 1,356,439 | | L | 12/31/2009 |
| 26202A-20-7 | Dreyfus Midcap Stock | | | 1,915,689,000 | 20,038,108 | 10.460 | 20,038,108 | 24,658,137 | | 203,005 | | 4,837,366 | | 4,837,366 | | L | 12/31/2009 |
| 26202A-80-1 | Dreyfus Technology Growth | | | 537,040,000 | 5,365,031 | 9.990 | 5,365,031 | 4,690,371 | | 14,282 | | 1,738,277 | | 1,738,277 | | L | 12/31/2009 |
| 313916-10-8 | Federated Capital Income | | | 271,463,000 | 2,353,583 | 8.670 | 2,353,583 | 2,517,357 | | 115,282 | | 392,519 | | 392,519 | | L | 12/31/2009 |
| 313916-30-6 | Federated High Income Bond | | | 1,001,062,000 | 6,677,080 | 6.670 | 6,677,080 | 6,560,763 | | 518,109 | | 1,637,043 | | 1,637,043 | | L | 12/31/2009 |
| 313916-60-3 | Federated International Equity | | | 117,564,000 | 1,617,684 | 13.760 | 1,617,684 | 1,881,229 | | 34,203 | | 431,636 | | 431,636 | | L | 12/31/2009 |
| 315802-20-7 | Fidelity Growth Opportunities | | | 827,807,000 | 12,011,477 | 14.510 | 12,011,477 | 13,728,287 | | 48,491 | | 3,563,818 | | 3,563,818 | | L | 12/31/2009 |
| 315802-50-4 | Fidelity Balanced | | | 6,205,000 | 83,202 | 13.410 | 83,202 | 86,335 | | 1,557 | | 20,697 | | 20,697 | | L | 12/28/2009 |
| 315802-70-2 | Fidelity Growth & Income | | | 919,115,000 | 10,174,603 | 11.070 | 10,174,603 | 11,954,330 | | 97,030 | | 2,028,788 | | 2,028,788 | | L | 12/31/2009 |
| 317613-30-5 | Ibbotson Conserv ETF Ast All 1 | | | 15,455,000 | 162,894 | 10.540 | 162,894 | 159,194 | | 1,053 | | 11,581 | | 11,581 | | L | 10/07/2009 |
| 317613-40-4 | Ibbotson Inc & Gr ETF Ast All1 | | | 26,347,000 | 249,234 | 9.460 | 249,234 | 259,921 | | 2,705 | | 25,434 | | 25,434 | | L | 09/01/2009 |
| 317613-50-3 | Ibbotson Balance ETF Ast All 1 | | | 141,859,000 | 1,288,082 | 9.080 | 1,288,082 | 1,234,549 | | 11,204 | | 163,706 | | 163,706 | | L | 12/16/2009 |
| 317613-60-2 | Ibbotson Growth ETF Ast All 1 | | | 68,765,000 | 591,384 | 8.600 | 591,384 | 583,369 | | 3,954 | | 64,999 | | 64,999 | | L | 11/23/2009 |
| 317613-70-1 | Ibbotson Aggress Grow ETF AA 1 | | | 57,206,000 | 462,790 | 8.090 | 462,790 | 416,161 | | 2,092 | | 73,663 | | 73,663 | | L | 10/29/2009 |
| 317613-80-0 | Ibbotson Aggress Grow ETF AA 2 | | | 238,027,000 | 1,918,495 | 8.060 | 1,918,495 | 1,721,328 | | 13,927 | | 377,645 | | 377,645 | | L | 12/31/2009 |
| 317613-85-9 | Ibbotson Conservative ETF AA 2 | | | 52,853,000 | 557,075 | 10.540 | 557,075 | 515,356 | | 3,699 | | 41,617 | | 41,617 | | L | 12/31/2009 |
| 317613-86-7 | Ibbotson Growth ETF Ast All 2 | | | 208,823,000 | 1,781,260 | 8.530 | 1,781,260 | 1,547,053 | | 11,400 | | 227,153 | | 227,153 | | L | 12/31/2009 |
| 317613-87-5 | Ibbotson Balance ETF Ast All 2 | | | 388,738,000 | 3,564,724 | 9.170 | 3,564,724 | 3,102,034 | | 25,868 | | 457,719 | | 457,719 | | L | 12/30/2009 |
| 317613-88-3 | Ibbotson Inc & Growth ETF AA 2 | | | 97,321,000 | 955,696 | 9.820 | 955,696 | 890,834 | | 6,633 | | 64,860 | | 64,860 | | L | 12/29/2009 |
| 355150-22-8 | FTVIP Founding Funds Alloc 2 | | | 50,544,000 | 360,882 | 7.140 | 360,882 | 335,990 | | 7,945 | | 58,078 | | 58,078 | | L | 12/24/2009 |
| 355150-23-6 | FTVIP Founding Funds Alloc 1 | | | 9,260,000 | 66,212 | 7.150 | 66,212 | 59,018 | | 1,612 | | 11,297 | | 11,297 | | L | 12/22/2009 |
| 355150-26-9 | Franklin Flex Cap Growth Sec | | | 67,038,000 | 732,729 | 10.930 | 732,729 | 620,982 | | | | 161,118 | | 161,118 | | L | 12/31/2009 |
| 355150-41-8 | Franklin Income Sec Fund CI II | | | 552,199,000 | 7,797,055 | 14.120 | 7,797,055 | 8,402,222 | | 471,911 | | 1,430,633 | | 1,430,633 | | L | 12/31/2009 |
| 355150-42-6 | Franklin U.S. Government | | | 2,309,599,000 | 29,724,535 | 12.870 | 29,724,535 | 29,244,284 | | 951,672 | | (196,960) | | (196,960) | | L | 12/31/2009 |
| 355150-48-3 | Templeton Developing Mkts | | | 925,346,000 | 9,049,885 | 9.780 | 9,049,885 | 9,470,825 | | 217,828 | | 3,199,953 | | 3,199,953 | | L | 12/31/2009 |
| 355150-49-1 | Templeton Growth | | | 700,634,000 | 7,286,593 | 10.400 | 7,286,593 | 8,862,623 | | 173,453 | | 1,494,220 | | 1,494,220 | | L | 12/31/2009 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 2 - SECTION 2

Showing All COMMON STOCKS Owned December 31 of Current Year

| 1 CUSIP Identification | 2 Description | 3 Codes | | 5 Number of Shares | 6 Book/ Adjusted Carrying Value | 7 Fair Value | | 9 Actual Cost | 10 Dividends | | | 13 Change in Book/Adjusted Carrying Value | | | | 17 NAIC Market Indicator (a) | 18 Date Acquired |
|---------------------------|---------------------------------|---------|-----------|-----------------------|------------------------------------|--|--------------|------------------|------------------------|--------------------------------|------------------------------------|--|--|---|--|---------------------------------|---------------------|
| | | 3 Code | 4 Foreign | | | 7 Rate Per Share Used to Obtain Fair Value | 8 Fair Value | | 10 Declared but Unpaid | 11 Amount Received During Year | 12 Nonadmitted Declared But Unpaid | 13 Unrealized Valuation Increase/ (Decrease) | 14 Current Year's Other Than Temporary Impairment Recognized | 15 Total Change in Book/Adjusted Carrying Value (13 - 14) | 16 Total Foreign Exchange Change in Book/Adjusted Carrying Value | | |
| 355150-52-5 | Franklin Small Cap | | | 530,324.000 | 8,946,563 | 16,870 | 8,946,563 | 10,062,871 | | | | 2,504,947 | | | 2,504,947 | U | 12/31/2009 |
| 355150-55-8 | Mutual Shares Security | | | 710,393.000 | 10,357,534 | 14,580 | 10,357,534 | 12,278,551 | | | 162,355 | | | | 1,872,076 | U | 12/31/2009 |
| 355150-56-6 | Templeton Global Bond Fd Cl 2 | | | 479,180.000 | 8,304,182 | 17,330 | 8,304,182 | 8,003,815 | | | 732,646 | | | | 242,040 | U | 12/31/2009 |
| 355150-59-0 | Franklin Small Cap Value Sec | | | 735,682.000 | 9,394,659 | 12,770 | 9,394,659 | 8,814,218 | | | 396,601 | | | | 1,718,812 | U | 12/31/2009 |
| 355150-67-3 | Franklin Small Cap Value Cl 1 | | | 726,000 | 9,442 | 13,000 | 9,442 | 9,435 | | | 502 | | | | 1,693 | U | 06/15/2009 |
| 355150-70-7 | Templeton Global Bond Fd Cl 1 | | | 11,004.000 | 194,991 | 17,720 | 194,991 | 184,793 | | | | | | | 10,198 | U | 12/22/2009 |
| 355150-76-4 | Templeton Growth Securiti Cl 1 | | | 5,452.000 | 57,576 | 10,560 | 57,576 | 76,301 | | | 1,653 | | | | 12,048 | U | 06/15/2009 |
| 355150-77-2 | Templeton Develop Mkts Sec Cl 1 | | | 10,945.000 | 108,025 | 9,870 | 108,025 | 102,608 | | | 3,561 | | | | 40,156 | U | 12/21/2009 |
| 355150-83-0 | Franklin Zero Coupon 2010 Cl 1 | | | 6,094.000 | 97,504 | 16,000 | 97,504 | 97,382 | | | | | | | 122 | U | 09/04/2009 |
| 355150-87-1 | Franklin US Government Cl 1 | | | 467.000 | 6,111 | 13,080 | 6,111 | 5,925 | | | 240 | | | | (42) | U | 06/15/2009 |
| 355150-88-9 | Franklin Inc Securities Cl 1 | | | 912.000 | 13,163 | 14,430 | 13,163 | 15,594 | | | 908 | | | | 2,567 | U | 06/15/2009 |
| 449797-64-6 | ING Global Resources Port Cl S | | | 184,869.000 | 3,301,759 | 17,860 | 3,301,759 | 3,850,633 | | | 7,875 | | | | 840,582 | U | 12/31/2009 |
| 449797-78-6 | ING JP Morgan Emerg Mkt Eqty 2 | | | 186,637.000 | 3,803,657 | 20,380 | 3,803,657 | 2,832,014 | | | 46,357 | | | | 1,510,489 | L | 12/31/2009 |
| 480906-10-6 | JP Morgan Ins Trst US Equity I | | | 314,073.000 | 4,375,032 | 13,930 | 4,375,032 | 4,440,436 | | | | | | | (65,404) | U | 12/31/2009 |
| 480906-60-1 | JP Morgan InsTrst MidCapVal I | | | 1,307,215.000 | 7,281,188 | 5,570 | 7,281,188 | 8,436,457 | | | | | | | (1,155,269) | U | 12/31/2009 |
| 480906-77-5 | JP Morgan Ins Trst Intl Equ I | | | 1,977,605.000 | 18,866,350 | 9,540 | 18,866,350 | 22,653,187 | | | 269,795 | | | | (3,786,837) | U | 12/31/2009 |
| 641222-70-8 | NeuberBerm AMT Regency Port I | | | 1,646.000 | 20,181 | 12,260 | 20,181 | 17,221 | | | 532 | | | | 2,961 | U | 10/15/2009 |
| 641222-83-1 | NeuberBerm AMT Regency Port S | | | 1,255.000 | 16,576 | 13,210 | 16,576 | 13,746 | | | 216 | | | | 2,830 | U | 11/18/2009 |
| 641222-85-6 | NeuberBerm AMT Mid Cap Grow S | | | 18,499.000 | 386,072 | 20,870 | 386,072 | 334,435 | | | | | | | 80,681 | U | 12/31/2009 |
| 641222-87-2 | NeuberBerm AMT Guardian Port S | | | 3,009.000 | 47,820 | 15,890 | 47,820 | 48,557 | | | 391 | | | | 9,273 | U | 12/28/2009 |
| 693394-40-5 | PIMCO Total Return Port Admin | | | 26,874.000 | 290,776 | 10,820 | 290,776 | 293,999 | | | 13,737 | | | | (3,310) | L | 12/31/2009 |
| 693394-59-5 | PIMCO Com Real Ret Strat Admin | | | 782,390.000 | 6,728,558 | 8,600 | 6,728,558 | 7,285,882 | | | 838,491 | | | | 854,321 | L | 12/31/2009 |
| 693394-63-7 | PIMCO All Assets Port Advisor | | | 89,735.000 | 942,218 | 10,500 | 942,218 | 894,416 | | | 52,228 | | | | 76,736 | L | 12/31/2009 |
| 693394-65-2 | PIMCO All Asset Portfolio Admn | | | 7,093.000 | 74,126 | 10,450 | 74,126 | 76,065 | | | 4,122 | | | | 2,366 | L | 12/30/2009 |
| 724027-18-0 | Pioneer Bond VCT Cl I | | | 1,950,751.000 | 22,219,049 | 11,390 | 22,219,049 | 21,038,663 | | | 1,099,139 | | | | 2,103,306 | L | 12/31/2009 |
| 724027-20-6 | Pioneer Mid Cap Value VCT Cl I | | | 1,380,531.000 | 19,990,084 | 14,480 | 19,990,084 | 25,579,516 | | | 260,778 | | | | 3,769,817 | L | 12/31/2009 |
| 724027-23-0 | Pioneer Growth Opp VCT Cl I | | | 4,443,291.000 | 85,044,598 | 19,140 | 85,044,598 | 97,458,094 | | | | | | | 25,810,297 | L | 12/31/2009 |
| 724027-30-5 | Pioneer Real Estate VCT Cl 1 | | | 3,407.000 | 44,423 | 13,040 | 44,423 | 35,167 | | | 1,594 | | | | 9,638 | L | 12/22/2009 |
| 724027-61-0 | Pioneer High Yield VCT Cl 1 | | | 1,282.000 | 12,216 | 9,530 | 12,216 | 9,321 | | | 415 | | | | 2,895 | L | 12/31/2009 |
| 724027-62-8 | Pioneer High Yield VCT Cl II | | | 271,349.000 | 2,580,526 | 9,510 | 2,580,526 | 2,144,811 | | | 99,119 | | | | 578,417 | L | 12/31/2009 |
| 724027-64-4 | Pioneer Strategic Inc VCT Cl II | | | 604,956.000 | 6,085,862 | 10,060 | 6,085,862 | 5,971,713 | | | 501,608 | | | | 472,711 | L | 12/31/2009 |
| 724027-70-1 | Pioneer Money Market VCT Cl I | | | 9,382,289.000 | 9,382,289 | 1,000 | 9,382,289 | 9,382,289 | | | 12,421 | | | | 2,395,896 | L | 12/31/2009 |
| 724027-75-0 | Pioneer Emerg Mkts VCT Cl II | | | 265,829.000 | 7,161,446 | 26,940 | 7,161,446 | 6,521,439 | | | 38,643 | | | | 2,395,896 | L | 12/31/2009 |
| 724027-81-8 | Pioneer Real Est VCT Prt Cl II | | | 225,061.000 | 2,932,543 | 13,030 | 2,932,543 | 2,632,976 | | | 83,892 | | | | 799,461 | L | 12/31/2009 |
| 724027-82-6 | Pioneer Eqty Income VCT Cl II | | | 454,052.000 | 7,650,777 | 16,850 | 7,650,777 | 8,535,671 | | | 176,419 | | | | 851,438 | L | 12/31/2009 |
| 724027-86-7 | Pioneer Emerging Mkt VCT Cl 1 | | | 2,718.000 | 74,305 | 27,340 | 74,305 | 63,102 | | | 84 | | | | 11,269 | L | 09/04/2009 |
| 724027-87-5 | Pioneer Fund VCT Cl I | | | 4,947,030.000 | 96,961,786 | 19,600 | 96,961,786 | 109,516,588 | | | 1,455,680 | | | | 17,990,668 | L | 12/31/2009 |
| 866167-20-8 | Summit S&P MidCap 400 Index | | | 246.000 | 13,439 | 54,660 | 13,439 | 13,749 | | | | | | | (310) | U | 12/30/2009 |
| 866167-40-6 | Summit Balanced Index | | | 1,415.000 | 64,254 | 45,420 | 64,254 | 58,716 | | | 1,407 | | | | 5,538 | U | 12/30/2009 |
| 866167-50-5 | Summit Lehman Aggreg Bond Indx | | | 22,061.000 | 1,121,129 | 50,820 | 1,121,129 | 1,146,109 | | | 56,423 | | | | (29,864) | U | 12/31/2009 |
| 866167-54-7 | Summit EAFE Internatl Index F | | | 1,166.000 | 85,373 | 73,190 | 85,373 | 85,050 | | | 726 | | | | 322 | U | 12/31/2009 |
| 866167-55-4 | Summit S&P MidCap 400 Cl F | | | 1,376.000 | 75,818 | 55,100 | 75,818 | 60,469 | | | 323 | | | | 15,349 | U | 12/30/2009 |
| 866167-68-7 | Summit Russell 2000 SmCap Id F | | | 15,636.000 | 787,761 | 50,380 | 787,761 | 623,996 | | | 10,569 | | | | 167,781 | U | 12/31/2009 |
| 866167-69-5 | Summit EAFE International Indx | | | 476.000 | 33,769 | 70,890 | 33,769 | 27,966 | | | 654 | | | | 9,588 | U | 12/30/2009 |
| 866167-79-4 | Summit Russell 2000 Sm Cap Idx | | | 385.000 | 19,335 | 50,190 | 19,335 | 20,144 | | | 310 | | | | 718 | U | 12/30/2009 |
| 866167-81-0 | Summit Nasdaq 100 Ind | | | 3,380.000 | 86,218 | 25,510 | 86,218 | 64,746 | | | 63 | | | | 21,473 | U | 12/30/2009 |
| 921925-20-2 | Vanguard VIF Tot Bnd Mkt InvCl | | | 343,163.000 | 4,039,029 | 11,770 | 4,039,029 | 3,914,258 | | | 118,131 | | | | 53,735 | L | 12/21/2009 |
| 921925-30-1 | Vanguard VIF Equity Index Port | | | 12,253.000 | 258,657 | 21,110 | 258,657 | 300,913 | | | 9,568 | | | | 44,115 | L | 12/21/2009 |
| 921925-40-0 | Vanguard VIF Balance Port Inv1 | | | 46,322.000 | 803,687 | 17,350 | 803,687 | 833,052 | | | 24,824 | | | | 111,665 | L | 12/22/2009 |
| 921925-70-7 | Vanguard VIF Intern'l Port Inv | | | 93,931.000 | 1,508,524 | 16,060 | 1,508,524 | 1,386,011 | | | 34,006 | | | | 358,576 | L | 12/28/2009 |
| 921925-80-6 | Vanguard VIF High Yield Bond I | | | 116,514.000 | 869,197 | 7,460 | 869,197 | 807,259 | | | 45,367 | | | | 151,242 | L | 12/21/2009 |
| 921925-81-4 | Vanguard VIF Total Stk Mkt Idx | | | 128,068.000 | 2,782,909 | 21,730 | 2,782,909 | 2,568,089 | | | 100,195 | | | | 465,636 | L | 12/28/2009 |
| 921925-82-2 | Vanguard VIF Capital Grwth Prt | | | 7,251.000 | 109,056 | 15,040 | 109,056 | 97,382 | | | | | | | 11,674 | L | 09/04/2009 |
| 921925-84-8 | Vanguard VIF REIT Index Inv Cl | | | 62,226.000 | 516,478 | 8,300 | 516,478 | 466,137 | | | 32,709 | | | | 91,550 | L | 12/28/2009 |

E12.1

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 2 - SECTION 2

Showing All COMMON STOCKS Owned December 31 of Current Year

| 1 | 2 | Codes | | 5 | 6 | Fair Value | | 9 | Dividends | | | Change in Book/Adjusted Carrying Value | | | | 17 | 18 |
|----------------------|-------------------------------------|-------|---------|------------------|------------------------------|--|-------------|-------------|---------------------|-----------------------------|---------------------------------|--|---|--|---|---------------------------|---------------|
| | | 3 | 4 | | | 7 | 8 | | 10 | 11 | 12 | 13 | 14 | 15 | 16 | | |
| CUSIP Identification | Description | Code | Foreign | Number of Shares | Book/Adjusted Carrying Value | Rate Per Share Used to Obtain Fair Value | Fair Value | Actual Cost | Declared but Unpaid | Amount Received During Year | Nonadmitted Declared But Unpaid | Unrealized Valuation Increase/(Decrease) | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (13 - 14) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | NAIC Market Indicator (a) | Date Acquired |
| 921925-85-5 | Vanguard VIF MidCap Idx Inv Cl | | | 150,721,000 | 1,811,664 | 12.020 | 1,811,664 | 1,647,596 | | 64,738 | | 403,871 | | 403,871 | | L | 12/28/2009 |
| 921925-88-9 | Vanguard VIF Small Com Growth | | | 6,160,000 | 82,919 | 13.460 | 82,919 | 78,716 | | 695 | | 22,186 | | 22,186 | | L | 12/21/2009 |
| 922174-10-7 | Fidelity Money Market | | | 6,296,348,000 | 6,296,348 | 1.000 | 6,296,348 | 6,296,348 | | 5,921 | | | | | | L | 12/31/2009 |
| 922174-20-6 | Fidelity VIP High Income Initt | | | 253,529,000 | 1,341,167 | 5.290 | 1,341,167 | 1,461,347 | | 95,178 | | 265,887 | | 265,887 | | L | 12/31/2009 |
| 922174-30-5 | Fidelity Equity Income | | | 1,359,789,000 | 22,858,059 | 16.810 | 22,858,059 | 27,709,195 | | 439,714 | | 4,662,228 | | 4,662,228 | | L | 12/31/2009 |
| 922174-40-4 | Fidelity Growth | | | 984,842,000 | 29,584,642 | 30.040 | 29,584,642 | 33,834,141 | | 136,851 | | 6,195,254 | | 6,195,254 | | L | 12/31/2009 |
| 922174-46-1 | Fidelity VIP Freedm 2030 Ser 2 | | | 15,119,000 | 136,070 | 9.000 | 136,070 | 118,858 | | 2,617 | | 17,145 | | 17,145 | | L | 12/31/2009 |
| 922174-49-5 | Fidelity Vip Freedm 2025 Ser 2 | | | 26,722,000 | 247,709 | 9.270 | 247,709 | 213,182 | | 8,805 | | 45,078 | | 45,078 | | L | 12/31/2009 |
| 922174-50-3 | Fidelity VIP Overseas Inital | | | 190,673,000 | 2,869,632 | 15.050 | 2,869,632 | 3,602,158 | | 61,729 | | 528,038 | | 528,038 | | L | 12/31/2009 |
| 922174-53-7 | Fidelity VIP Freedm 2020 Ser 2 | | | 56,161,000 | 532,403 | 9.480 | 532,403 | 473,203 | | 20,494 | | 95,954 | | 95,954 | | L | 12/31/2009 |
| 922174-56-0 | Fidelity VIP Freedm 2015 Ser 2 | | | 6,790,000 | 66,136 | 9.740 | 66,136 | 61,173 | | 2,658 | | 8,820 | | 8,820 | | L | 12/31/2009 |
| 922174-59-4 | Fidelity VIP Freedm 2010 Ser 2 | | | 10,206,000 | 99,411 | 9.740 | 99,411 | 97,369 | | 4,019 | | 14,780 | | 14,780 | | L | 12/31/2009 |
| 922174-66-9 | Fidelity VIP Freedom Inc Ser 2 | | | 5,274,000 | 52,581 | 9.970 | 52,581 | 54,029 | | 2,358 | | 3,940 | | 3,940 | | L | 12/28/2009 |
| 922174-83-4 | Fidelity VIP Money Mkt Serv Cl | | | 23,176,165,000 | 23,176,165 | 1.000 | 23,176,165 | 23,176,165 | | 29,960 | | | | | | L | 12/31/2009 |
| 922174-87-5 | Fidelity VIP Overseas Ser 2 | | | 7,181,000 | 107,138 | 14.920 | 107,138 | 114,963 | | 1,752 | | 4,224 | | 4,224 | | L | 12/31/2009 |
| 922175-10-4 | Fidelity VIP Invest Grade Bd I | | | 115,775,000 | 1,444,870 | 12.480 | 1,444,870 | 1,428,961 | | 109,647 | | 59,706 | | 59,706 | | L | 12/31/2009 |
| 922175-20-3 | Fidelity Asset Manager | | | 404,306,000 | 5,255,978 | 13.000 | 5,255,978 | 5,775,995 | | 119,172 | | 1,010,839 | | 1,010,839 | | L | 12/31/2009 |
| 922175-30-2 | Fidelity Index 500 | | | 50,667,000 | 6,060,750 | 119.620 | 6,060,750 | 6,742,970 | | 220,017 | | 991,574 | | 991,574 | | L | 12/31/2009 |
| 922175-40-1 | Fidelity Asset Manager: Growth | | | 45,643,000 | 577,837 | 12.660 | 577,837 | 589,437 | | 8,912 | | 127,204 | | 127,204 | | L | 12/31/2009 |
| 922175-50-0 | Fidelity Contrafund | | | 2,319,321,000 | 47,824,392 | 20.620 | 47,824,392 | 57,485,610 | | 575,499 | | 11,389,528 | | 11,389,528 | | L | 12/31/2009 |
| 922176-40-9 | Fidelity VIP Mid Cap Initial | | | 3,261,000 | 83,298 | 25.540 | 83,298 | 75,198 | | 830 | | 8,592 | | 8,592 | | L | 12/18/2009 |
| 922176-80-5 | Fidelity Mid-Cap Advisor | | | 432,753,000 | 10,862,112 | 25.100 | 10,862,112 | 11,062,706 | | 89,110 | | 2,559,855 | | 2,559,855 | | L | 12/31/2009 |
| 933702-10-2 | Wanger Small Cap | | | 34,962,000 | 959,705 | 27.450 | 959,705 | 939,872 | | | | 267,810 | | 267,810 | | L | 12/31/2009 |
| 9299999 | Mutual Funds | | | | 840,022,056 | XXX | 840,022,056 | 924,844,079 | | 17,183,171 | | 143,384,323 | | 143,384,323 | | XXX | XXX |
| 9799999 | - Total Common Stocks | | | | 840,022,056 | XXX | 840,022,056 | 924,844,079 | | 17,183,171 | | 143,384,323 | | 143,384,323 | | XXX | XXX |
| 9899999 | - Total Preferred and Common Stocks | | | | 840,022,056 | XXX | 840,022,056 | 924,844,079 | | 17,183,171 | | 143,384,323 | | 143,384,323 | | XXX | XXX |

(a) For all common stock bearing the NAIC market indicator "U" provide: the number of such issues50 , the total \$ value (included in Column 8) of all such issues \$233,154,329

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 3

Showing All Long-Term Bonds and Stocks ACQUIRED During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|---|--|---------|---------------|----------------------------|---------------------------|-------------|-------------|---|
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Number of Shares of Stock | Actual Cost | Par Value | Paid for Accrued Interest and Dividends |
| 17309*-92-7 | FHA PROJ SECT 236 #92 (CITICORP) 7.680% 12/01/17 | | 12/31/2009 | Symetra BOLI U-Life | | 1,513,461 | 1,537,192 | 8,526 |
| 36202F-BK-1 | Government National Mortgage A POOL 4542 5.500% 09/20/39 | | 09/30/2009 | Morgan Stanley & Co., Inc. | | 9,312,574 | 8,855,282 | 27,058 |
| 3620A2-T5-5 | GNM 5.000% 05/15/39 | | 06/23/2009 | JP Morgan Securities, Inc. | | 4,963,467 | 4,890,868 | 12,906 |
| 3620A9-P2-1 | Government National Mortgage A POOL 723241 5.000% 10/15/39 | | 12/02/2009 | JP Morgan Securities, Inc. | | 11,798,866 | 11,252,085 | 31,256 |
| 3620A9-P2-8 | Government National Mortgage A POOL 723240 5.000% 10/15/39 | | 11/03/2009 | Bank of America Securities | | 8,360,357 | 8,059,389 | 20,148 |
| 3620A9-TN-1 | Government National Mortgage A 5.500% 09/15/39 | | 10/14/2009 | UBS PaineWebber, Inc. | | 16,485,276 | 15,619,341 | 47,726 |
| 3620AA-TX-6 | Government National Mortgage A POOL 724266 5.500% 09/15/39 | | 10/06/2009 | Bank of America Securities | | 20,672,874 | 19,712,840 | 61,984 |
| 3620AC-6M-1 | GNM 2009-20 A POOL 726376 5.000% 10/15/39 | | 11/20/2009 | JP Morgan Securities, Inc. | | 16,204,757 | 15,499,991 | 43,056 |
| 3620AC-DB-7 | GNM 2009-20 A 5.470% 08/20/59 | | 07/16/2009 | Bank of America Securities | | 831,094 | 800,000 | 2,917 |
| 3620AC-DB-7 | GNM 2009-20 A 5.470% 08/20/59 | | 12/01/2009 | Interest Capitalization | | 10,963 | 10,963 | |
| 3620AD-CD-2 | Government National Mortgage A POOL 726468 5.000% 11/15/39 | | 11/13/2009 | JP Morgan Securities, Inc. | | 12,541,535 | 11,965,686 | 29,914 |
| 36295P-YT-3 | Government National Mortgage A POOL 676722 5.500% 02/15/38 | | 09/16/2009 | Morgan Stanley & Co., Inc. | | 15,829,240 | 15,095,684 | 46,126 |
| 36296D-LC-0 | Government National Mortgage A POOL 688023 6.000% 10/15/38 | | 12/31/2009 | Various | | (2,488,457) | (2,410,858) | (8,036) |
| 36296D-LC-0 | Government National Mortgage A POOL 688023 6.000% 10/15/38 | | 12/31/2009 | Symetra BOLI U-Life | | 470,683 | 461,502 | 2,231 |
| 36296Q-3N-7 | Government National Mortgage A POOL 698405 5.000% 07/15/39 | | 08/18/2009 | Bank of America Securities | | 6,663,342 | 6,505,781 | 18,072 |
| 36296Q-H9-3 | Government National Mortgage A POOL 697856 5.500% 02/15/39 | | 09/16/2009 | Morgan Stanley & Co., Inc. | | 10,225,983 | 9,752,092 | 29,798 |
| 36296X-HC-1 | Government National Mortgage A POOL 704127 5.500% 01/15/39 | | 01/21/2009 | JP MORGAN EQUITIES | | 2,518,451 | 2,440,655 | 6,712 |
| 36297A-KW-2 | Government National Mortgage A POOL 706009 5.500% 01/15/39 | | 02/10/2009 | Symetra BOLI U-Life | | 4,773,713 | 4,639,536 | 18,429 |
| 36297C-YC-7 | Government National Mortgage A POOL 708207 5.500% 02/15/39 | | 02/06/2009 | Sandler O'Neil | | 3,514,604 | 3,426,792 | 9,424 |
| 619999-AA-3 | FHA 241(F) #052-12012L(MOSSHILL) 8.200% 06/01/33 | | 12/31/2009 | Symetra BOLI U-Life | | 2,201,818 | 2,195,762 | 6,002 |
| 039999. Bonds - U.S. Governments | | | | | | 146,405,051 | 140,310,583 | 414,249 |
| 31339L-IN-7 | FHLIC REMIC SER 2395 VB (VADM) 6.000% 05/15/19 | | 12/31/2009 | Symetra BOLI U-Life | | 1,727,000 | 1,727,000 | 8,347 |
| 31362W-3B-0 | FNMA DUS POOL #73694 (30/15) 8.060% 10/01/26 | | 12/31/2009 | Symetra BOLI U-Life | | 600,492 | 593,814 | 3,856 |
| 31362W-TC-0 | FNMA DUS POOL #73447 (30/30/20) 7.400% 05/01/26 | | 12/31/2009 | Symetra BOLI U-Life | | 732,848 | 703,223 | 4,192 |
| 31368H-NN-9 | Fannie Mae 5.000% 09/01/39 | | 08/27/2009 | Citibank Mortgages | | 138,754,642 | 135,546,014 | 244,736 |
| 31377F-GU-4 | FNMA DUS POOL #375611 (30/30/15) 7.000% 01/01/28 | | 12/31/2009 | Symetra BOLI U-Life | | 705,725 | 696,392 | 3,927 |
| 31377M-NC-1 | FNMA DUS POOL #381187 (30/30/15) 6.430% 01/01/29 | | 12/31/2009 | Symetra BOLI U-Life | | 275,524 | 260,291 | 1,348 |
| 31377R-UP-3 | FNMA DUS POOL #384990 (30/18/15) 6.570% 04/01/20 | | 12/31/2009 | Symetra BOLI U-Life | | 642,709 | 609,495 | 3,226 |
| 31381G-MK-1 | FNMA DUS PL #460362 (40/15.5/15.25) 6.631% 09/01/15 | | 12/31/2009 | Symetra BOLI U-Life | | 898,328 | 889,875 | 4,753 |
| 31392E-3V-0 | FNMA REMIC SER 2002-71 PZ (PAC-Z) 5.500% 11/25/32 | | 12/31/2009 | Symetra BOLI U-Life | | 636,759 | 674,225 | 2,987 |
| 31393C-5M-1 | FNMA REMIC SER 2003-66 MZ (PAC Z) 5.000% 07/25/23 | | 12/31/2009 | Symetra BOLI U-Life | | 571,922 | 619,627 | 2,496 |
| 31393C-SZ-7 | FNMA REMIC SER 2003-45 Z (PAC Z) 5.500% 06/25/33 | | 12/01/2009 | Interest Capitalization | | 76,630 | 76,630 | |
| 31393D-Y3-9 | FNMA REMIC SER 2003-75 GZ (PAC Z) 5.000% 08/25/23 | | 12/01/2009 | Interest Capitalization | | 20,112 | 20,112 | |
| 31393E-6H-7 | FNMA REMIC SER 2003-W14 1A8 (WH-SEO) 5.858% 09/25/43 | | 12/01/2009 | Symetra BOLI U-Life | | 930,432 | 931,978 | 4,398 |
| 31393E-B2-4 | FNMA REMIC 2003-93 MK (DUS 30/10/9.5) 7.500% 11/25/19 | | 10/31/2009 | Symetra BOLI U-Life | | 821,767 | 782,711 | 4,729 |
| 31393E-IUJ-5 | FNMA REMIC SER 2003-84 PZ (PAC Z) 5.000% 09/25/33 | | 12/01/2009 | Interest Capitalization | | 107,405 | 107,405 | |
| 31393E-IUJ-5 | FNMA REMIC SER 2003-84 PZ (PAC Z) 5.000% 09/25/33 | | 11/01/2009 | Symetra BOLI U-Life | | 61,367 | 70,521 | 20 |
| 31393F-NG-5 | FHLIC REMIC SERIES 2532 CLASS BL 4.250% 09/15/16 | | 01/27/2009 | Sandler O'Neil | | 1,785,233 | 1,755,607 | 6,011 |
| 31393M-J3-6 | FHLIC REMIC SER 2585 KZ (PAC-Z) 5.500% 03/15/23 | | 12/01/2009 | Interest Capitalization | | 23,200 | 23,200 | |
| 31393M-PD-7 | FHLIC REMIC SER 2582 TD (BPAC) 5.000% 01/15/28 | | 11/01/2009 | Symetra BOLI U-Life | | 12,666 | 12,685 | 46 |
| 31393Q-DY-5 | FHLIC REMIC SER 2615 PD (BPAC) 5.500% 01/15/32 | | 11/01/2009 | Symetra BOLI U-Life | | 1,147,716 | 1,136,000 | 5,033 |
| 31393Q-Z4-7 | FHLIC REMIC SER 2611 MZ (PAC-Z) 5.500% 05/15/33 | | 12/01/2009 | Interest Capitalization | | 97,703 | 97,703 | |
| 31393T-VN-3 | FNMA REMIC SER 2003-100 KA (B-VADM) 5.000% 10/25/18 | | 11/01/2009 | Symetra BOLI U-Life | | 130,067 | 131,121 | 473 |
| 31393U-NZ-5 | FNMA REMIC SER 2004-7 Z (ACRL) 5.500% 02/25/34 | | 12/01/2009 | Interest Capitalization | | 528,224 | 528,224 | |
| 31393W-BR-9 | FHLIC REMIC SER 2640 PZ (PAC Z) 5.000% 07/15/33 | | 11/01/2009 | Symetra BOLI U-Life | | 930,433 | 1,033,018 | 4,161 |
| 31393W-SV-2 | FHLIC REMIC SER 2645 NZ (PAC Z) 5.000% 07/15/33 | | 12/01/2009 | Interest Capitalization | | 100,558 | 100,558 | |
| 31393X-ZU-4 | FNMA REMIC SER 2004-17 DZ (Z-PAC) 5.500% 04/25/34 | | 12/01/2009 | Interest Capitalization | | 172,031 | 172,031 | |
| 31394K-D3-5 | FHLIC REMIC SER 2690 VZ (PAC Z) 5.000% 10/15/33 | | 12/01/2009 | Interest Capitalization | | 59,587 | 59,587 | |
| 31394M-KN-9 | FHLIC REMIC SER 2714 LZ (PAC Z) 5.500% 12/15/33 | | 12/01/2009 | Interest Capitalization | | 31,542 | 31,542 | |
| 31394M-KN-9 | FHLIC REMIC SER 2714 LZ (PAC Z) 5.500% 12/15/33 | | 11/01/2009 | Symetra BOLI U-Life | | 1,914,070 | 2,022,333 | 8,960 |
| 31394P-VH-3 | FHLIC REMIC SER 2743 MZ (PAC Z) 5.000% 02/15/34 | | 12/01/2009 | Interest Capitalization | | 418,952 | 418,952 | |
| 31394W-Y9-3 | FHLIC REMIC SER 2785 ZU (PAC Z - RESEC) 5.000% 03/15/34 | | 12/01/2009 | Interest Capitalization | | 171,127 | 171,127 | |
| 31395A-V4-4 | FHLIC REMIC SER 2812 OG (PAC) 5.000% 06/15/34 | | 11/01/2009 | Symetra BOLI U-Life | | 1,081,685 | 1,188,000 | 4,785 |
| 31395H-MA-5 | FHLIC 2877 MV 4.750% 12/15/28 | | 11/01/2009 | Symetra BOLI U-Life | | 2,801,572 | 2,800,741 | 9,608 |
| 31396H-E9-3 | FANNIE MAE SERIES 2007-65 CLASS PC 6.000% 07/25/35 | | 11/01/2009 | Symetra BOLI U-Life | | 1,726,657 | 1,731,000 | 3,533 |
| 31396H-GJ-9 | FANNIE MAE SERIES 200755 CLASS PE 6.000% 12/25/43 | | 11/01/2009 | Symetra BOLI U-Life | | 1,797,385 | 1,795,000 | 8,676 |
| 31412Q-BN-8 | FANNIE MAE 5.000% 07/01/39 | | 07/13/2009 | UBS PaineWebber, Inc. | | 14,406,103 | 14,091,251 | 23,485 |
| 31412Q-HW-2 | FANNIE MAE 5.000% 08/01/39 | | 08/31/2009 | Citibank Mortgages | | 9,486,209 | 9,738,186 | 17,128 |
| 31412T-SU-3 | FANNIE MAE POOL 934759 5.000% 02/01/39 | | 02/23/2009 | Barclays Capital, Inc. | | 14,440,661 | 14,120,738 | 49,030 |
| 31412U-H5-2 | FANNIE MAE POOL 935052 5.000% 03/01/39 | | 03/23/2009 | Morgan Stanley & Co., Inc. | | 16,972,600 | 16,488,257 | 27,480 |
| 31414J-KK-8 | FANNIE MAE POOL 967498 5.500% 01/01/38 | | 11/01/2009 | Symetra BOLI U-Life | | 153,602 | 151,490 | 671 |
| 31415Y-XT-1 | FANNIE MAE POOL 993590 5.000% 05/01/39 | | 05/22/2009 | Various | | 18,938,019 | 18,411,563 | 25,572 |
| 31416H-UN-3 | FANNIE MAE POOL AA0588 5.500% 02/01/39 | | 02/17/2009 | Greenwich Mortgages, Inc. | | 1,893,600 | 1,898,028 | 5,335 |
| 31416L-SJ-6 | FANNIE MAE POOL AA3220 5.000% 04/01/39 | | 04/07/2009 | Bank of America Securities | | 20,579,785 | 19,935,012 | 33,225 |
| 31416L-ZX-7 | FANNIE MAE POOL AA3457 5.000% 03/01/39 | | 03/13/2009 | Greenwich Mortgages, Inc. | | 9,604,443 | 9,384,494 | 15,641 |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 3

Showing All Long-Term Bonds and Stocks ACQUIRED During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|---|--|---------|---------------|-----------------------------|---------------------------|--------------------|--------------------|---|
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Number of Shares of Stock | Actual Cost | Par Value | Paid for Accrued Interest and Dividends |
| 31416M-KD-5 | Fannie Mae 5.000% 03/01/39 | | 08/31/2009 | Citibank Mortgages | | 15,239,955 | 14,845,618 | 26,805 |
| 31416R-GU-1 | FANNIE MAE POOL AA7410 5.000% 05/01/39 | | 05/29/2009 | JP Morgan Securities, Inc. | | 7,938,328 | 7,742,350 | 10,753 |
| 31416R-PC-1 | FANNIE MAE POOL AA7618 5.000% 05/01/39 | | 05/06/2009 | KBC Securities | | 2,982,457 | 2,893,395 | 4,420 |
| 31417K-SQ-1 | FNMA Pool # AC1426 5.000% 08/01/39 | | 08/28/2009 | Bank of America Securities | | 3,941,856 | 3,847,473 | 6,947 |
| 31417S-7M-6 | Fannie Mae POOL AC6299 5.000% 12/01/39 | | 12/08/2009 | Various | | 23,312,180 | 22,275,000 | 40,219 |
| 31417U-CB-9 | Fannie Mae POOL AC7265 5.000% 11/01/39 | | 10/28/2009 | Morgan Stanley & Co., Inc. | | 9,967,985 | 9,642,549 | 14,732 |
| 31417V-PR-8 | FANNIE MAE POOL AC8531 5.000% 12/01/39 | | 12/18/2009 | JP Morgan Securities, Inc. | | 66,096,224 | 63,500,000 | |
| 38373M-AR-1 | GNMA REMIC SER 2001-34 Z (PROJ Z-ADJ) 7.021% 03/16/41 | | 12/01/2009 | Interest Capitalization | | 264,821 | 264,821 | |
| 38373S-LY-1 | GNMA REMIC SER 2003-12 OZ (PAC - Z) 5.250% 02/20/33 | | 12/01/2009 | Interest Capitalization | | 116,807 | 116,807 | |
| 38373Y-D9-2 | GNMA REMIC SER 2003-4 IZ (PAC Z) 5.500% 01/20/33 | | 12/01/2009 | Interest Capitalization | | 114,804 | 114,804 | |
| 38374L-SH-0 | GOVERNMENT NATIONAL MTG ASSOC Series 2005-60 Class IZ 5.500% 09/20/35 | | 12/01/2009 | Interest Capitalization | | 33,710 | 33,710 | |
| 3199999. Bonds - U.S. Special Revenues | | | | | | 398,208,349 | 387,701,311 | 641,744 |
| 032654-AE-5 | ANALOG DEVICES 5.000% 07/01/14 | | 06/25/2009 | Credit Suisse First Boston | | 4,978,800 | 5,000,000 | |
| 035229-DD-2 | ANHEUSER-BUSCH CO BASIC 5.500% 01/15/18 | | 11/01/2009 | Symetra BOLI U-Life | | 1,745,490 | 2,000,000 | 40,333 |
| 039483-AY-8 | ARCHER DANIELS MIDLAND CO BASIC 5.450% 03/15/18 | | 11/01/2009 | Symetra BOLI U-Life | | 1,859,182 | 2,000,000 | 21,800 |
| 054937-AE-7 | BBT CORPORATION NTS 5.200% 12/23/15 | | 11/01/2009 | Symetra BOLI U-Life | | 1,745,951 | 1,750,000 | 38,928 |
| 05955F-AA-8 | BANC OF AMERICA LARGE LOAN 2009-UB1 5.615% 06/24/50 | | 07/02/2009 | Bank of America Securities | | 7,460,156 | 9,000,000 | 9,973 |
| 072732-AC-4 | BAYER CORP DEBS 144A 6.650% 02/15/28 | | 11/01/2009 | Symetra BOLI U-Life | | 495,994 | 500,000 | 9,421 |
| 07388V-AE-8 | BEAR STEARNS COMMERCIAL MORTGAGE SERIES 2007T26 CLASS AA 5.471% 01/12/45 | | 11/01/2009 | Symetra BOLI U-Life | | 1,813,105 | 2,000,000 | 7,903 |
| 075811-AE-9 | BECKMAN COULTER INC 6.000% 06/01/15 | | 06/23/2009 | RBC Dain Rauscher, Inc. | | 10,377,950 | 10,000,000 | 55,833 |
| 081437-AF-2 | BEMIS CO INC 6.800% 08/01/19 | | 08/11/2009 | RBC Dain Rauscher, Inc. | | 5,418,650 | 5,000,000 | 16,056 |
| 12189T-BC-7 | BURLINGTON NORTHERN SANTA FE 4.700% 10/01/19 | | 09/21/2009 | Barclays Capital, Inc. | | 4,991,250 | 5,000,000 | |
| 126650-AW-0 | CVS CORP 144A 5.298% 01/11/27 | | 11/01/2009 | Symetra BOLI U-Life | | 2,076,614 | 2,081,135 | 5,207 |
| 12669E-ME-3 | COUNTRYWIDE HOME LOANS SER 2003-18 A10 (ACRL-SUB) 5.500% 07/25/33 | | 12/01/2009 | Interest Capitalization | | 30,652 | 30,652 | |
| 127391-AA-8 | CADETS TRUST Series 144A 4.800% 07/15/13 | | 11/01/2009 | Symetra BOLI U-Life | | 1,997,301 | 2,000,000 | 35,200 |
| 14912L-AE-8 | CATERPILLAR FINL SVCS 7.150% 02/15/19 | | 09/22/2009 | Credit Suisse First Boston | | 2,916,425 | 2,500,000 | 19,861 |
| 191098-AH-5 | COCA-COLA BOTTLING CO CONSOL 5.000% 06/15/16 | | 11/01/2009 | Symetra BOLI U-Life | | 990,348 | 1,000,000 | 22,500 |
| 20030N-AG-6 | COMCAST CORP 4.950% 06/15/16 | | 11/01/2009 | Symetra BOLI U-Life | | 945,893 | 1,000,000 | 22,275 |
| 20030N-AZ-4 | COMCAST CORP 5.700% 07/01/19 | | 06/15/2009 | Various | | 5,985,780 | 6,000,000 | |
| 20825C-AR-5 | CONOCOPHILLIPS 5.750% 02/01/19 | | 01/29/2009 | Bank of America Securities | | 24,831,500 | 25,000,000 | |
| 24240V-AM-3 | DEAN WITTER, DISCOVER DEBS 6.750% 01/01/16 | | 11/01/2009 | Symetra BOLI U-Life | | 2,314,183 | 2,300,000 | 62,963 |
| 24422E-QV-4 | JOHN DEERE CAPITAL CORP MTN 5.750% 09/10/18 | | 09/24/2009 | Various | | 17,547,233 | 16,005,000 | 53,683 |
| 25468P-CG-9 | THE WALT DISNEY CO MTNC 6.000% 07/17/17 | | 07/07/2009 | RBC Dain Rauscher, Inc. | | 5,431,800 | 5,000,000 | 144,167 |
| 25468P-CK-0 | THE WALT DISNEY CO 5.500% 03/15/19 | | 05/20/2009 | RBC Dain Rauscher, Inc. | | 5,173,850 | 5,000,000 | 53,472 |
| 260003-AH-1 | DOVER CORP 5.450% 03/15/18 | | 09/11/2009 | Bank of America Securities | | 6,492,120 | 6,000,000 | 908 |
| 26882P-AN-2 | ERAC USA FINANCE CO NOTES 144A 8.000% 01/15/11 | | 11/01/2009 | Symetra BOLI U-Life | | 2,148,779 | 2,100,000 | 61,600 |
| 32051D-XY-3 | FIRST HORIZON ASSET SECURITIES SER 2003-5 1A5 (ACRL) 5.250% 07/25/33 | | 12/01/2009 | Interest Capitalization | | 36,027 | 36,027 | |
| 350259-AB-3 | FOSTERS FIN CORP 144A 4.875% 10/01/14 | | 11/01/2009 | Symetra BOLI U-Life | | 292,410 | 300,000 | 2,275 |
| 36228C-VU-4 | GS MTG SEC CORP II SERIES 2005GG4 CLASS A4A 4.751% 07/10/39 | | 11/01/2009 | Symetra BOLI U-Life | | 818,701 | 1,000,000 | 3,431 |
| 362320-AT-0 | GTE CORP DEBS 8.750% 11/01/21 | | 11/01/2009 | Symetra BOLI U-Life | | 1,186,582 | 1,000,000 | 6,319 |
| 362333-AH-9 | GTE FLA INC DEBS 6.860% 02/01/28 | | 11/01/2009 | Symetra BOLI U-Life | | 999,582 | 1,000,000 | 22,104 |
| 377372-AD-9 | GLAXOSMITHKLINE CAP INC BASIC 5.650% 05/15/18 | | 11/01/2009 | Symetra BOLI U-Life | | 1,006,476 | 1,000,000 | 1,883 |
| 438516-AX-4 | HONEYWELL INC BASIC 5.300% 03/01/18 | | 11/01/2009 | First Tennessee Bank | | 13,177,793 | 12,150,000 | 75,128 |
| 438516-AZ-9 | HONEYWELL INC 5.000% 02/15/19 | | 02/17/2009 | JP MORGAN EQUITIES | | 9,964,300 | 10,000,000 | |
| 450679-BX-2 | ITT CORP 6.125% 05/01/19 | | 10/06/2009 | Various | | 16,958,141 | 15,650,000 | 324,287 |
| 45068H-AF-3 | ITT HARTFORD GROUP INC DEBS 7.300% 11/01/15 | | 11/01/2009 | Symetra BOLI U-Life | | 1,019,193 | 1,000,000 | 5,272 |
| 487836-BB-3 | KELLOGG COMPANY 4.450% 05/30/16 | | 05/18/2009 | JP Morgan Securities, Inc. | | 9,973,600 | 10,000,000 | |
| 494550-AH-9 | KINDER MORGAN ENERGY PARTNRS NOTES 6.750% 03/15/11 | | 11/01/2009 | Symetra BOLI U-Life | | 1,998,411 | 2,000,000 | 27,000 |
| 58013M-EB-6 | MCDONALD'S CORP 5.800% 10/15/17 | | 05/26/2009 | JP Morgan Securities, Inc. | | 6,386,940 | 6,000,000 | 42,533 |
| 589331-AN-7 | MERCK AND CO., INC. 5.000% 06/30/19 | | 06/22/2009 | Bank of America Securities | | 19,873,800 | 20,000,000 | |
| 653522-DO-2 | NIAGARA MOHAWK PWR CORP 144A 3.553% 10/01/14 | | 09/21/2009 | JP Morgan Securities, Inc. | | 3,000,000 | 3,000,000 | |
| 693304-AL-1 | PECO ENERGY CO 5.350% 03/01/18 | | 11/23/2009 | First Tennessee Securities | | 18,980,325 | 17,500,000 | 231,462 |
| 72018Q-AJ-0 | PIEDMONT NATURAL GAS NTS SER D 6.550% 09/26/11 | | 11/01/2009 | Symetra BOLI U-Life | | 111,381 | 110,000 | 520 |
| 771196-AQ-5 | ROCHE HLDGS INC 144A 5.000% 03/01/14 | | 02/18/2009 | JP Morgan Securities, Inc. | | 1,687,658 | 1,700,000 | |
| 771196-AS-1 | ROCHE HLDGS INC 144A 6.000% 03/01/19 | | 02/18/2009 | Various | | 27,953,552 | 28,400,000 | |
| 786514-BM-0 | SAFEWAY INC 5.625% 08/15/14 | | 03/13/2009 | JP Morgan Securities, Inc. | | 770,983 | 755,000 | 3,893 |
| 870836-AD-5 | SWISS BANK CORP NY SUB DEBS 7.000% 10/15/15 | | 11/01/2009 | Symetra BOLI U-Life | | 1,594,364 | 1,500,000 | 12,250 |
| 870845-AC-8 | SWISS BANK CORP-NY SUB DEBS 7.750% 09/01/26 | | 11/01/2009 | Symetra BOLI U-Life | | 457,163 | 400,000 | 7,406 |
| 880394-AD-3 | TENNECO PACKAGING DEBS 8.125% 06/15/17 | | 11/01/2009 | Symetra BOLI U-Life | | 2,291,823 | 1,958,000 | 71,589 |
| 9021EQ-AD-6 | Tyco/tyco intl fin sa 6.875% 01/15/21 | | 12/15/2009 | Morgan Stanley & Co., Inc. | | 4,532,160 | 4,000,000 | 116,875 |
| 92922F-RE-0 | WASHINGTON MUTUAL SER 2004-CB1 3A3 (ACRL) 5.500% 06/25/34 | | 12/01/2009 | Interest Capitalization | | 126,923 | 126,923 | |
| 71644E-AB-8 | PETRO-CANADA DEBS 9.250% 10/15/21 | | 11/01/2009 | Symetra BOLI U-Life | | 1,206,185 | 1,000,000 | 10,792 |
| 05565Q-BJ-6 | BP Capital PLC 4.750% 03/10/19 | A. | 03/05/2009 | Goldman Sachs & Co. | | 15,857,388 | 15,900,000 | |
| 822582-AJ-1 | SHELL INTERNATIONAL FIN 4.300% 09/22/19 | F. | 09/15/2009 | Morgan Stanley & Co., Inc. | | 78,029,082 | 78,300,000 | |
| 902118-BL-1 | TYCO INT'L 8.500% 01/15/19 | F. | 09/01/2009 | Cantor Fitzgerald & Company | | 2,422,220 | 2,000,000 | 23,139 |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 3

Showing All Long-Term Bonds and Stocks ACQUIRED During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|---|---|---------|---------------|--|---------------------------|-------------|-------------|---|
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Number of Shares of Stock | Actual Cost | Par Value | Paid for Accrued Interest and Dividends |
| 3899999. Bonds - Industrial and Miscellaneous (Unaffiliated) | | | | | | 362,482,169 | 356,052,737 | 1,670,341 |
| 404270-AA-1 | HSBC AMERICAS INC CAP SEC II 144A 8.380% 05/15/27 | | 11/01/2009 | Symetra BOLI U-Life | | 2,204,641 | 2,160,000 | 6,034 |
| 4899999. Bonds - Hybrid Securities | | | | | | 2,204,641 | 2,160,000 | 6,034 |
| 8399997. Total - Bonds - Part 3 | | | | | | 909,300,210 | 886,224,631 | 2,732,368 |
| 8399998. Total - Bonds - Part 5 | | | | | | 42,858,851 | 43,065,682 | 107,502 |
| 8399999. Total - Bonds | | | | | | 952,159,061 | 929,290,313 | 2,839,870 |
| 8999997. Total - Preferred Stocks - Part 3 | | | | | | | XXX | |
| 8999998. Total - Preferred Stocks - Part 5 | | | | | | | XXX | |
| 8999999. Total - Preferred Stocks | | | | | | | XXX | |
| 008892-10-1 | AIM VI Capital Appreciation I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 46,127,000 | 807,581 | | |
| 008892-41-6 | AIM VI Global Health Car Ser I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 5,822,000 | 77,411 | | |
| 008892-50-7 | AIM VI International Growth I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 43,838,000 | 979,444 | | |
| 008892-52-3 | AIM VI Glob Real Estate Ser I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 340,458,000 | 3,099,658 | | |
| 008892-53-1 | AIM VI Sm Cap Equity Fd Ser II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 4,717,000 | 46,476 | | |
| 008892-65-5 | AIM VI International Growth II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 275,830,000 | 5,804,530 | | |
| 008892-74-7 | AIM VI Cap Development Ser II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 35,807,000 | 310,007 | | |
| 008892-75-4 | AIM VI Capital Appreciation II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 58,750,000 | 985,755 | | |
| 008892-85-3 | AIM VI Cap Development Ser I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 11,038,000 | 97,105 | | |
| 024936-10-6 | American Century Value | | 12/31/2009 | American Century Variable Portfolios, Inc. | 443,547,000 | 1,960,844 | | |
| 024936-20-5 | American Century International | | 12/31/2009 | American Century Variable Portfolios, Inc. | 408,788,000 | 2,428,950 | | |
| 024936-40-3 | American Century Balanced | | 12/31/2009 | American Century Variable Portfolios, Inc. | 1,594,270,000 | 8,588,677 | | |
| 024936-75-9 | American Century Large Co Val | | 12/31/2009 | American Century Variable Portfolios, Inc. | 106,511,000 | 727,383 | | |
| 024936-85-8 | American Century VP Ultra II | | 12/31/2009 | American Century Variable Portfolios, Inc. | 17,630,000 | 114,413 | | |
| 024936-88-2 | American Century VP Ultra CI I | | 12/31/2009 | American Century Variable Portfolios, Inc. | 17,520,000 | 114,769 | | |
| 025077-20-9 | American Century Inflat Protec | | 12/31/2009 | American Century Variable Portfolios, Inc. | 344,256,000 | 3,552,837 | | |
| 025077-30-8 | Amer Cent VP Inflation Protect | | 12/31/2009 | American Century Variable Portfolios, Inc. | 6,083,000 | 64,576 | | |
| 23338G-40-6 | DWS Captial Growth VIP B | | 12/31/2009 | DWS Variable Series I and II | 69,132,000 | 973,762 | | |
| 23338G-60-4 | DWS Global Opportunities B | | 12/31/2009 | DWS Variable Series I and II | 5,148,000 | 54,231 | | |
| 23338G-85-1 | DWS International VIP B | | 04/23/2009 | DWS Variable Series I and II | 458,000 | 2,673 | | |
| 23338G-86-9 | DWS International VIP A | | 12/31/2009 | DWS Variable Series I and II | 165,222,000 | 1,046,272 | | |
| 23338H-68-5 | DWS Balanced VIP A | | 12/31/2009 | DWS Variable Series I and II | 118,536,000 | 2,004,043 | | |
| 23338H-79-2 | DWS VIP Money Market CI A | | 12/15/2009 | DWS Variable Series I and II | 36,846,000 | 36,846 | | |
| 23338H-80-0 | DWS Global Thematic B | | 12/09/2009 | DWS Variable Series I and II | 3,106,000 | 22,272 | | |
| 23339F-40-7 | DWS Small Cap Index A | | 11/02/2009 | DWS Variable Series I and II | 4,444,000 | 37,035 | | |
| 261976-60-9 | Dreyfus Quality Bond | | 12/31/2009 | Dreyfus Variable Insurance Fund | 210,109,000 | 2,188,875 | | |
| 261976-80-7 | Dreyfus Appreciation | | 12/31/2009 | Dreyfus Variable Insurance Fund | 60,796,000 | 1,550,161 | | |
| 262014-20-2 | Dreyfus Stock Index | | 12/31/2009 | Dreyfus Variable Insurance Fund | 410,660,000 | 8,960,603 | | |
| 26201X-10-9 | Dreyfus Socially Responsible | | 12/31/2009 | Dreyfus Variable Insurance Fund | 75,689,000 | 1,581,304 | | |
| 26202A-20-7 | Dreyfus Midcap Stock | | 12/31/2009 | Dreyfus Variable Insurance Fund | 407,833,000 | 3,364,071 | | |
| 26202A-80-1 | Dreyfus Technology Growth | | 12/31/2009 | Dreyfus Variable Insurance Fund | 164,922,000 | 1,256,361 | | |
| 313916-10-8 | Federated Capital Income | | 12/31/2009 | Federated Insurance Series | 41,388,000 | 293,020 | | |
| 313916-30-6 | Federated High Income Bond | | 12/31/2009 | Federated Insurance Series | 283,395,000 | 1,430,175 | | |
| 313916-60-3 | Federated International Equity | | 12/31/2009 | Federated Insurance Series | 15,773,000 | 157,952 | | |
| 315802-20-7 | Fidelity Growth Opportunities | | 12/31/2009 | Fidelity Variable Insurance Products | 122,870,000 | 1,405,336 | | |
| 315802-50-4 | Fidelity Balanced | | 12/28/2009 | Fidelity Variable Insurance Products | 1,081,000 | 11,941 | | |
| 315802-70-2 | Fidelity Growth & Income | | 12/31/2009 | Fidelity Variable Insurance Products | 198,042,000 | 1,807,581 | | |
| 317613-30-5 | Ibbotson Conserv ETF Ast All 1 | | 10/07/2009 | Financial Investors Variable Insurance Trust | 491,000 | 5,116 | | |
| 317613-40-4 | Ibbotson Inc & Gr ETF Ast All1 | | 09/01/2009 | Financial Investors Variable Insurance Trust | 5,249,000 | 46,369 | | |
| 317613-50-3 | Ibbotson Balance ETF Ast All 1 | | 12/16/2009 | Financial Investors Variable Insurance Trust | 76,059,000 | 621,006 | | |
| 317613-60-2 | Ibbotson Growth ETF Ast All 1 | | 11/23/2009 | Financial Investors Variable Insurance Trust | 41,670,000 | 338,615 | | |
| 317613-70-1 | Ibbotson Aggress Grow ETF AA 1 | | 10/29/2009 | Financial Investors Variable Insurance Trust | 37,617,000 | 264,544 | | |
| 317613-80-0 | Ibbotson Aggress Grow ETF AA 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 104,068,000 | 686,194 | | |
| 317613-85-9 | Ibbotson Conservative ETF AA 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 52,533,000 | 512,324 | | |
| 317613-86-7 | Ibbotson Growth ETF Ast All 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 190,354,000 | 1,426,881 | | |
| 317613-87-5 | Ibbotson Balance ETF Ast All 2 | | 12/30/2009 | Financial Investors Variable Insurance Trust | 378,713,000 | 3,029,513 | | |
| 317613-88-3 | Ibbotson Inc & Growth ETF AA 2 | | 12/29/2009 | Financial Investors Variable Insurance Trust | 97,321,000 | 890,834 | | |
| 355150-22-8 | FTVIP Founding Funds Alloc 2 | | 12/24/2009 | Franklin Templeton Variable Insurance Products Trust | 29,217,000 | 183,160 | | |
| 355150-23-6 | FTVIP Founding Funds Alloc 1 | | 12/22/2009 | Franklin Templeton Variable Insurance Products Trust | 7,485,000 | 44,939 | | |
| 355150-26-9 | Franklin Flex Cap Growth Sec | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 49,474,000 | 427,230 | | |
| 355150-41-8 | Franklin Income Sec Fund CI II | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 152,058,000 | 1,828,820 | | |
| 355150-42-6 | Franklin U.S. Government | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 826,016,000 | 10,649,760 | | |
| 355150-48-3 | Templeton Developing Mkts | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 329,081,000 | 2,248,489 | | |
| 355150-49-1 | Templeton Growth | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 155,806,000 | 1,324,784 | | |
| 355150-52-5 | Franklin Small Cap | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 120,828,000 | 1,630,039 | | |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 3

Showing All Long-Term Bonds and Stocks ACQUIRED During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|----------------------|---------------------------------|---------|---------------|--|---------------------------|-------------|-----------|---|
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Number of Shares of Stock | Actual Cost | Par Value | Paid for Accrued Interest and Dividends |
| 355150-55-8 | Mutual Shares Security | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 164,022.000 | 2,049,201 | | |
| 355150-56-6 | Templeton Global Bond Fd Cl 2 | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 272,423.000 | 4,526,609 | | |
| 355150-59-0 | Franklin Small Cap Value Sec | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 470,431.000 | 4,877,454 | | |
| 355150-67-3 | Franklin Small Cap Value Cl 1 | | 06/15/2009 | Franklin Templeton Variable Insurance Products Trust | 458.000 | 4,873 | | |
| 355150-70-7 | Templeton Global Bond Fd Cl 1 | | 12/22/2009 | Franklin Templeton Variable Insurance Products Trust | 11,004.000 | 184,793 | | |
| 355150-76-4 | Templeton Growth Securiti Cl 1 | | 06/15/2009 | Franklin Templeton Variable Insurance Products Trust | 264.000 | 2,258 | | |
| 355150-77-2 | Templeton Develop Mkts Sec Cl 1 | | 12/21/2009 | Franklin Templeton Variable Insurance Products Trust | 2,026.000 | 13,377 | | |
| 355150-83-0 | Franklin Zero Coupon 2010 Cl 1 | | 09/04/2009 | Franklin Templeton Variable Insurance Products Trust | 6,094.000 | 97,382 | | |
| 355150-87-1 | Franklin US Government Cl 1 | | 06/15/2009 | Franklin Templeton Variable Insurance Products Trust | 19.000 | 244 | | |
| 355150-88-9 | Franklin Inc Securities Cl 1 | | 06/15/2009 | Franklin Templeton Variable Insurance Products Trust | 77.000 | 923 | | |
| 449797-64-6 | ING Global Resources Port Cl S | | 12/31/2009 | Ing Investors Trust | 38,388.000 | 552,527 | | |
| 449797-78-6 | ING JP Morgan Emerg Mkt Eqty 2 | | 12/31/2009 | Ing Investors Trust | 14,579.000 | 221,598 | | |
| 480906-10-6 | JP Morgan Ins Trst US Equly I | | 12/31/2009 | JP Morgan Series Trust | 314,073.000 | 4,440,436 | | |
| 480906-60-1 | JP Morgan InsTrst MidCapVal I | | 12/31/2009 | JP Morgan Series Trust | 1,307,215.000 | 8,436,457 | | |
| 480906-77-5 | JP Morgan Ins Trst Intl Equ I | | 12/31/2009 | JP Morgan Series Trust | 1,977,605.000 | 22,653,187 | | |
| 641222-70-8 | NeuberBerm AMT Regency Port I | | 10/15/2009 | Neuberger Berman Advisers Management Trust | 1,646.000 | 17,221 | | |
| 641222-83-1 | NeuberBerm AMT Regency Port S | | 11/18/2009 | Neuberger Berman Advisers Management Trust | 1,255.000 | 13,746 | | |
| 641222-85-6 | NeuberBerm AMT Mid Cap Gro S | | 12/31/2009 | Neuberger Berman Advisers Management Trust | 11,975.000 | 201,727 | | |
| 641222-87-2 | NeuberBerm AMT Guardian Port S | | 12/28/2009 | Neuberger Berman Advisers Management Trust | 1,235.000 | 16,581 | | |
| 693394-40-5 | PIMCO Total Return Port Admin | | 12/31/2009 | PIMCO Variable Insurance Trust | 25,023.000 | 275,005 | | |
| 693394-59-5 | PIMCO Com Real Ret Strat Admin | | 12/31/2009 | PIMCO Variable Insurance Trust | 468,560.000 | 3,677,425 | | |
| 693394-63-7 | PIMCO All Assets Port Advisor | | 12/31/2009 | PIMCO Variable Insurance Trust | 67,936.000 | 664,278 | | |
| 693394-65-2 | PIMCO All Asset Portfolio Admn | | 12/30/2009 | PIMCO Variable Insurance Trust | 5,065.000 | 53,102 | | |
| 724027-18-0 | Pioneer Bond VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 279,086.000 | 2,997,902 | | |
| 724027-20-6 | Pioneer Mid Cap Value VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 101,354.000 | 1,228,320 | | |
| 724027-23-0 | Pioneer Growth Opp VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 266,369.000 | 3,931,849 | | |
| 724027-30-5 | Pioneer Real Estate VCT Cl I | | 12/22/2009 | Pioneer Variable Contracts Trust | 525.000 | 4,786 | | |
| 724027-61-0 | Pioneer High Yield VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 1,282.000 | 9,321 | | |
| 724027-62-8 | Pioneer High Yield VCT Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 206,307.000 | 1,582,527 | | |
| 724027-64-4 | Pioneer Strtegic Inc VCT Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 349,719.000 | 3,336,437 | | |
| 724027-70-1 | Pioneer Money Market VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 2,666,095.000 | 2,666,095 | | |
| 724027-75-0 | Pioneer Emerg Mkts VCT Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 128,934.000 | 2,627,241 | | |
| 724027-81-8 | Pioneer Real Est VCT Prt Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 140,511.000 | 1,255,451 | | |
| 724027-82-6 | Pioneer Eqty Income VCT Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 183,764.000 | 2,674,744 | | |
| 724027-86-7 | Pioneer Emerging Mkt VCT Cl 1 | | 09/04/2009 | Pioneer Variable Contracts Trust | 2,556.000 | 60,467 | | |
| 724027-87-5 | Pioneer Fund VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 401,915.000 | 6,521,987 | | |
| 866167-20-8 | Summit S&P MidCap 400 Index | | 12/30/2009 | Summit Mutual Funds, Inc. | 246.000 | 13,749 | | |
| 866167-40-6 | Summit Balanced Index | | 12/30/2009 | Summit Mutual Funds, Inc. | 1,415.000 | 58,716 | | |
| 866167-50-5 | Summit Lehman Aggreg Bond Indx | | 12/31/2009 | Summit Mutual Funds, Inc. | 18,806.000 | 984,455 | | |
| 866167-54-7 | Summit EAFE Internatl Index F | | 12/31/2009 | Summit Mutual Funds, Inc. | 1,166.000 | 85,050 | | |
| 866167-55-4 | Summit S&P MidCap 400 Cl F | | 12/30/2009 | Summit Mutual Funds, Inc. | 1,376.000 | 60,469 | | |
| 866167-68-7 | Summit Russell 2000 SmCap Id F | | 12/31/2009 | Summit Mutual Funds, Inc. | 14,040.000 | 555,293 | | |
| 866167-69-5 | Summit EAFE International Indx | | 12/30/2009 | Summit Mutual Funds, Inc. | 372.000 | 18,260 | | |
| 866167-79-4 | Summit Russell 2000 Sm Cap Idx | | 12/30/2009 | Summit Mutual Funds, Inc. | 272.000 | 14,059 | | |
| 866167-81-0 | Summit Nasdaq 100 Ind | | 12/30/2009 | Summit Mutual Funds, Inc. | 3,380.000 | 64,746 | | |
| 921925-20-2 | Vanguard VIF Tot Bnd Mkt InvCl | | 12/21/2009 | Vanguard Variable Insurance Fund Portfolios | 143,593.000 | 1,666,291 | | |
| 921925-30-1 | Vanguard VIF Equity Index Port | | 12/21/2009 | Vanguard Variable Insurance Fund Portfolios | 1,147.000 | 18,970 | | |
| 921925-40-0 | Vanguard VIF Balance Port Inv1 | | 12/22/2009 | Vanguard Variable Insurance Fund Portfolios | 10,859.000 | 165,402 | | |
| 921925-70-7 | Vanguard VIF Internl Port Inv | | 12/28/2009 | Vanguard Variable Insurance Fund Portfolios | 42,894.000 | 547,723 | | |
| 921925-80-6 | Vanguard VIF High Yield Bond I | | 12/21/2009 | Vanguard Variable Insurance Fund Portfolios | 48,024.000 | 313,176 | | |
| 921925-81-4 | Vanguard VIF Total Stk Mkt Idx | | 12/28/2009 | Vanguard Variable Insurance Fund Portfolios | 60,657.000 | 1,082,428 | | |
| 921925-82-2 | Vanguard VIF Capital Grwth Prt | | 09/04/2009 | Vanguard Variable Insurance Fund Portfolios | 7,251.000 | 97,382 | | |
| 921925-84-8 | Vanguard VIF REIT Index Inv Cl | | 12/28/2009 | Vanguard Variable Insurance Fund Portfolios | 34,062.000 | 209,470 | | |
| 921925-85-5 | Vanguard VIF MidCap Idx Inv Cl | | 12/28/2009 | Vanguard Variable Insurance Fund Portfolios | 66,754.000 | 633,621 | | |
| 921925-88-9 | Vanguard VIF Small Com Growth | | 12/21/2009 | Vanguard Variable Insurance Fund Portfolios | 665.000 | 6,990 | | |
| 922174-10-7 | Fidelity Money Market | | 12/31/2009 | Fidelity Variable Insurance Products | 6,271,490.000 | 6,271,490 | | |
| 922174-20-6 | Fidelity VIP High Income Inittl | | 12/31/2009 | Fidelity Variable Insurance Products | 64,338.000 | 326,085 | | |
| 922174-30-5 | Fidelity Equity Income | | 12/31/2009 | Fidelity Variable Insurance Products | 363,239.000 | 5,061,298 | | |
| 922174-40-4 | Fidelity Growth | | 12/31/2009 | Fidelity Variable Insurance Products | 165,324.000 | 4,106,149 | | |
| 922174-46-1 | Fidelity VIP Freedm 2030 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 13,753.000 | 109,217 | | |
| 922174-49-5 | Fidelity Vip Freedm 2025 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 24,030.000 | 182,527 | | |
| 922174-50-3 | Fidelity VIP Overseas Inital | | 12/31/2009 | Fidelity Variable Insurance Products | 23,565.000 | 307,881 | | |
| 922174-53-7 | Fidelity VIP Freedm 2020 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 6,366.000 | 53,527 | | |
| 922174-56-0 | Fidelity VIP Freedm 2015 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 5,287.000 | 45,050 | | |
| 922174-59-4 | Fidelity VIP Freedm 2010 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 4,345.000 | 36,508 | | |
| 922174-66-9 | Fidelity VIP Freedom Inc Ser 2 | | 12/28/2009 | Fidelity Variable Insurance Products | 671.000 | 6,657 | | |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 3

Showing All Long-Term Bonds and Stocks ACQUIRED During Current Year

| 1 CUSIP Identification | 2 Description | 3 Foreign | 4 Date Acquired | 5 Name of Vendor | 6 Number of Shares of Stock | 7 Actual Cost | 8 Par Value | 9 Paid for Accrued Interest and Dividends | |
|--|--------------------------------|--------------|-----------------------|--------------------------------------|-----------------------------------|------------------|----------------|--|-----------|
| 922174-83-4 | Fidelity VIP Money Mkt Serv Cl | | 12/31/2009 | Fidelity Variable Insurance Products | 21,912,199.000 | 21,912,199 | | | |
| 922174-87-5 | Fidelity VIP Overseas Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 5,444.000 | 81,950 | | | |
| 922175-10-4 | Fidelity VIP Invest Grade Bd I | | 12/31/2009 | Fidelity Variable Insurance Products | 32,168.000 | 395,261 | | | |
| 922175-20-3 | Fidelity Asset Manager | | 12/31/2009 | Fidelity Variable Insurance Products | 59,186.000 | 686,950 | | | |
| 922175-30-2 | Fidelity Index 500 | | 12/31/2009 | Fidelity Variable Insurance Products | 12,165.000 | 1,250,207 | | | |
| 922175-40-1 | Fidelity Asset Manager: Growth | | 12/31/2009 | Fidelity Variable Insurance Products | 8,651.000 | 92,549 | | | |
| 922175-50-0 | Fidelity Contrafund | | 12/31/2009 | Fidelity Variable Insurance Products | 515,027.000 | 8,666,777 | | | |
| 922176-40-9 | Fidelity VIP Mid Cap Initial | | 12/16/2009 | Fidelity Variable Insurance Products | 3,133.000 | 72,333 | | | |
| 922176-80-5 | Fidelity Mid-Cap Advisor | | 12/31/2009 | Fidelity Variable Insurance Products | 164,028.000 | 3,432,951 | | | |
| 933702-10-2 | Wanger Small Cap | | 12/31/2009 | Wanger Advisors Trust | 7,645.000 | 164,670 | | | |
| 9299999. Common Stocks - Mutual Funds | | | | | | | 225,849,624 | XXX | |
| 9799997. Total - Common Stocks - Part 3 | | | | | | | 225,849,624 | XXX | |
| 9799998. Total - Common Stocks - Part 5 | | | | | | | 28,738,018 | XXX | |
| 9799999. Total - Common Stocks | | | | | | | 254,587,642 | XXX | |
| 9899999. Total - Preferred and Common Stocks | | | | | | | 254,587,642 | XXX | |
| 9999999 - Totals | | | | | | | 1,206,746,703 | XXX | 2,839,870 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---|---------|---------------|-------------------|-----------------------------|---------------|-----------|-------------|---|--|---|---|---|---|---|--|----------------------------------|-------------------------------|--|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/Adjusted Carrying Value | Unrealized Valuation Increase/Decrease | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Book/Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/Stock Dividends Received During Year | Maturity Date |
| 31337-PN-3 | FHLMC REMIC SER 1871 Z 7.000% 08/15/26 | | 10/28/2009 | Broadpoint | | 711,718 | 650,899 | 589,747 | 611,985 | | | | 5,937 | | 617,921 | | 93,796 | 93,796 | 41,639 | 08/15/2026 |
| 31337-PN-3 | FHLMC REMIC SER 1871 Z 7.000% 08/15/26 | | 10/01/2009 | Paydown | | 115,978 | 115,978 | 105,082 | 109,044 | | | | 6,934 | | 115,978 | | | | 3,930 | 08/15/2026 |
| 31337B-XJ-1 | FHLMC REMIC SER 1941 E (SEQ) 7.500% | | 12/01/2009 | Paydown | | 34,582 | 34,582 | 33,604 | 33,930 | | | | 652 | | 34,582 | | | | 1,347 | 02/15/2027 |
| 31337G-E9-6 | FHLMC REMIC SER 2086 GB (SEQ) 6.000% | | 09/15/28 | 10/29/2009 | Morgan Keegan & Co., Inc. | 316,332 | 297,724 | 277,396 | 285,462 | | | | 2,674 | | 288,136 | | 28,196 | 28,196 | 16,325 | 09/15/2028 |
| 31337G-E9-6 | FHLMC REMIC SER 2086 GB (SEQ) 6.000% | | 09/15/28 | 10/01/2009 | Paydown | 83,091 | 83,091 | 77,418 | 79,669 | | | | 3,422 | | 83,091 | | | | 2,691 | 09/15/2028 |
| 31337G-U4-9 | FHLMC REMIC SER 2091 ZC (B-PAC-ACRL) 6.000% | | 11/15/28 | 12/01/2009 | Paydown | 1,929,601 | 1,929,601 | 1,848,242 | 1,876,153 | | | | 53,448 | | 1,929,601 | | | | 58,297 | 11/15/2028 |
| 31359B-6U-6 | FNMA REMIC SER 1993-149 M (B-PAC) 7.000% | | 08/25/23 | 12/01/2009 | Paydown | 93,762 | 93,762 | 93,410 | 93,460 | | | | 302 | | 93,762 | | | | 3,527 | 08/25/2023 |
| 31359B-P4-3 | FNMA REMIC SER 1993-133-KZ (B-PAC) 7.000% | | 08/25/23 | 12/01/2009 | Paydown | 160,376 | 160,376 | 155,546 | 157,159 | | | | 3,217 | | 160,376 | | | | 6,343 | 08/25/2023 |
| 31359B-TX-5 | FNMA REMIC SER 1993-127 H (BPAC) 6.500% | | 07/25/23 | 10/29/2009 | Broadpoint | 290,052 | 268,567 | 243,053 | 254,233 | | | | 154 | | 254,388 | | 35,664 | 35,664 | 15,954 | 07/25/2023 |
| 31359B-TX-5 | FNMA REMIC SER 1993-127 H (BPAC) 6.500% | | 07/25/23 | 10/01/2009 | Paydown | 49,555 | 49,555 | 44,848 | 46,911 | | | | 2,645 | | 49,555 | | | | 1,576 | 07/25/2023 |
| 31359F-DA-3 | FNMA REMIC SER 1993-202 J (BPAC) 6.500% | | 11/25/23 | 12/01/2009 | Paydown | 181,719 | 181,719 | 178,768 | 179,948 | | | | 1,771 | | 181,719 | | | | 6,322 | 11/25/2023 |
| 31359K-M2-0 | FNMA REMIC SER 1996-59 K (SEQ) 6.500% | | 07/25/23 | 12/01/2009 | Paydown | 202,602 | 202,602 | 199,658 | 201,231 | | | | 1,371 | | 202,602 | | | | 6,832 | 07/25/2023 |
| 31359U-YS-8 | FNMA REMIC SER 1998-58 ZB (ACRL) 6.000% | | 10/25/28 | 12/01/2009 | Paydown | 418,513 | 418,513 | 426,039 | 423,742 | | | | (5,229) | | 418,513 | | | | 13,230 | 07/25/2028 |
| 31362W-MM-5 | FNMA DUS POOL #73264 (30/30/29) 6.960% | | 12/01/25 | 12/01/2009 | Paydown | 400,693 | 400,693 | 422,230 | 415,503 | | | | (14,810) | | 400,693 | | | | 15,280 | 12/01/2025 |
| 313637-EV-8 | FNMA DUS POOL #109148 (30/18/17.5) 7.000% | | 12/01/15 | 12/01/2009 | Paydown | 22,236 | 22,236 | 22,945 | 22,492 | | | | (256) | | 22,236 | | | | 853 | 12/01/2015 |
| 31371G-SS-0 | FNMA POOL #251729 6.500% 05/01/18 | | 12/01/2009 | Paydown | 43,174 | 43,174 | 41,110 | 41,790 | | | | 1,384 | | | 43,174 | | | | 1,526 | 05/01/2018 |
| 31371H-SM-6 | FNMA POOL #252952 6.500% 10/01/19 | | 12/01/2009 | Paydown | 22,079 | 22,079 | 20,547 | 20,781 | | | | 1,298 | | | 22,079 | | | | 791 | 10/01/2019 |
| 31371H-GK-9 | FNMA POOL #252974 8.000% 10/01/19 | | 12/01/2009 | Paydown | 663 | 663 | 658 | 658 | | | | 4 | | | 663 | | | | 30 | 10/01/2019 |
| 31371H-VM-7 | FNMA POOL #252720 7.500% 08/01/29 | | 12/01/2009 | Paydown | 86,913 | 86,913 | 85,596 | 85,648 | | | | 1,265 | | | 86,913 | | | | 3,445 | 08/01/2029 |
| 31371J-BZ-9 | FNMA POOL #253057 8.000% 12/01/29 | | 12/01/2009 | Paydown | 3,960 | 3,960 | 3,975 | 3,968 | | | | (8) | | | 3,960 | | | | 170 | 12/01/2029 |
| 31371J-BZ-6 | FNMA POOL #253056 7.500% 12/01/29 | | 12/01/2009 | Paydown | 44,453 | 44,453 | 43,772 | 43,801 | | | | 652 | | | 44,453 | | | | 3,047 | 12/01/2029 |
| 31371J-KE-3 | FNMA POOL #253293 8.000% 03/01/20 | | 12/01/2009 | Paydown | 3,784 | 3,784 | 3,756 | 3,758 | | | | 27 | | | 3,784 | | | | 198 | 03/01/2020 |
| 31371J-KN-3 | FNMA POOL #253301 8.000% 04/01/20 | | 12/01/2009 | Paydown | 2,786 | 2,786 | 2,765 | 2,766 | | | | 19 | | | 2,786 | | | | 113 | 04/01/2020 |
| 31371J-LZ-5 | FNMA POOL #253344 8.000% 06/01/20 | | 12/01/2009 | Paydown | 33,690 | 33,690 | 33,437 | 33,454 | | | | 236 | | | 33,690 | | | | 1,508 | 06/01/2020 |
| 31371K-4H-1 | FNMA POOL #254724 5.000% 04/01/33 | | 12/01/2009 | Paydown | 2,654,857 | 2,654,857 | 2,655,437 | 2,654,590 | | | | 268 | | | 2,654,857 | | | | 67,257 | 04/01/2033 |
| 31371K-6B-2 | FNMA POOL #254766 5.000% 06/01/33 | | 12/01/2009 | Paydown | 750,683 | 750,683 | 746,695 | 746,806 | | | | 3,877 | | | 750,683 | | | | 19,423 | 06/01/2033 |
| 31371K-ML-2 | FNMA POOL #254263 6.500% 04/01/32 | | 12/01/2009 | Paydown | 170,024 | 170,024 | 169,334 | 169,329 | | | | 694 | | | 170,024 | | | | 5,796 | 04/01/2032 |
| 31371K-NX-5 | FNMA POOL #254306 5.500% 05/01/17 | | 12/01/2009 | Paydown | 524,969 | 524,969 | 524,723 | 524,282 | | | | 687 | | | 524,969 | | | | 16,181 | 05/01/2017 |
| 31371K-UA-7 | FNMA POOL #254477 5.500% 10/01/32 | | 12/01/2009 | Paydown | 1,149,303 | 1,149,303 | 1,155,768 | 1,154,965 | | | | (5,662) | | | 1,149,303 | | | | 33,217 | 10/01/2032 |
| 31371K-VB-4 | FNMA POOL #254510 5.000% 11/01/17 | | 12/01/2009 | Paydown | 389,353 | 389,353 | 395,133 | 393,251 | | | | (3,897) | | | 389,353 | | | | 10,033 | 11/01/2017 |
| 31371K-VF-5 | FNMA POOL #254514 5.500% 11/01/32 | | 12/01/2009 | Paydown | 1,189,282 | 1,189,282 | 1,198,202 | 1,197,268 | | | | (7,985) | | | 1,189,282 | | | | 32,652 | 11/01/2032 |
| 31371K-XT-3 | FNMA POOL #254590 5.000% 01/01/18 | | 12/01/2009 | Paydown | 1,324,872 | 1,324,872 | 1,338,121 | 1,333,401 | | | | (8,529) | | | 1,324,872 | | | | 35,425 | 01/01/2018 |
| 31371K-XW-6 | FNMA POOL #254593 5.000% 01/01/33 | | 12/01/2009 | Paydown | 368,478 | 368,478 | 367,615 | 367,627 | | | | 852 | | | 368,478 | | | | 9,715 | 01/01/2033 |
| 31371L-DH-9 | FNMA POOL #254904 5.500% 10/01/33 | | 12/01/2009 | Paydown | 144,049 | 144,049 | 143,149 | 143,170 | | | | 879 | | | 144,049 | | | | 4,146 | 10/01/2033 |
| 31371N-O2-1 | FNMA POOL #257072 5.500% 02/01/38 | | 12/01/2009 | Paydown | 240,323 | 240,323 | 243,402 | 243,336 | | | | (3,012) | | | 240,323 | | | | 5,999 | 02/01/2038 |
| 31376F-M7-9 | FNMA POOL #354182 7.500% 11/01/26 | | 12/01/2009 | Paydown | 7,045 | 7,045 | 6,955 | 6,959 | | | | 86 | | | 7,045 | | | | 272 | 11/01/2026 |
| 31377F-JP-2 | FNMA DUS POOL #375670 (30/18/17.5) 6.350% | | 03/01/16 | 12/01/2009 | Paydown | 20,867 | 20,867 | 20,639 | 20,715 | | | | 152 | | 20,867 | | | | 726 | 03/01/2016 |
| 31377L-F6-5 | FNMA DUS POOL #380089 (30/17.5/15) 7.800% | | 07/01/15 | 12/01/2009 | Paydown | 11,679 | 11,679 | 12,993 | 12,230 | | | | (551) | | 11,679 | | | | 500 | 07/01/2015 |
| 31377L-HC-0 | FNMA DUS POOL #380127 (30/17/15) 7.910% | | 07/01/15 | 10/28/2009 | Cantor Fitzgerald & Company | 1,063,595 | 936,153 | 1,036,790 | 977,734 | | | | (5,500) | | 972,234 | | 91,360 | 91,360 | 67,673 | 07/01/2015 |
| 31377L-HC-0 | FNMA DUS POOL #380127 (30/17/15) 7.910% | | 07/01/15 | 10/01/2009 | Paydown | 17,915 | 17,915 | 19,840 | 18,710 | | | | (796) | | 17,915 | | | | 656 | 07/01/2015 |
| 31377L-HE-6 | FNMA DUS POOL #380129 (30/17/15) 7.910% | | 07/01/15 | 12/01/2009 | Paydown | 19,686 | 19,686 | 21,802 | 20,561 | | | | (874) | | 19,686 | | | | 855 | 07/01/2015 |

E14.2

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---|---------|---------------|-----------------------------|---------------------------|---------------|-----------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 31377M-KS-9 | FNMA DUS POOL #381105 (30/17.5/15) 7.160% | | 10/28/2009 | Cantor Fitzgerald & Company | | 1,046,285 | 936,895 | 996,329 | 962,463 | | (3,168) | | (3,168) | | 959,295 | | 86,990 | 86,990 | 61,305 | 04/01/2016 |
| 31377M-KS-9 | FNMA DUS POOL #381105 (30/17.5/15) 7.160% | | 10/01/2009 | Paydown | | 18,058 | 18,058 | 19,204 | 18,551 | | (493) | | (493) | | 18,058 | | | | 599 | 04/01/2016 |
| 31377M-QY-0 | FNMA DUS POOL #381271 (30/18/15) 6.370% | | 10/28/2009 | Banc of America Securities | | 941,078 | 859,156 | 876,339 | 867,804 | | (1,173) | | (1,173) | | 866,631 | | 74,447 | 74,447 | 50,016 | 01/01/2017 |
| 31377M-QY-0 | FNMA DUS POOL #381271 (30/18/15) 6.370% | | 10/01/2009 | Paydown | | 15,644 | 15,644 | 15,956 | 15,801 | | (157) | | (157) | | 15,644 | | | | 461 | 01/01/2017 |
| 31377N-HS-1 | FNMA DUS POOL #381941 (30/18/15) 7.455% | | 12/01/2009 | Paydown | | 35,574 | 35,574 | 35,752 | 35,592 | | (18) | | (18) | | 35,574 | | | | 1,455 | 09/01/2017 |
| 31377R-UP-3 | FNMA DUS POOL #384990 (30/18/15) 6.570% | | 12/01/2009 | Paydown | | 7,480 | 7,480 | 8,153 | 7,926 | | (446) | | (446) | | 7,480 | | | | 269 | 04/01/2020 |
| 31377S-5P-9 | FNMA DUS POOL #386154 (30/18/15) 5.320% | | 12/01/2009 | Paydown | | 29,891 | 29,891 | 30,302 | 30,156 | | (266) | | (266) | | 29,891 | | | | 870 | 04/01/2021 |
| 31377S-UU-0 | FNMA DUS POOL #385895 (30/18/15) 5.550% | | 12/01/2009 | Paydown | | 24,893 | 24,893 | 25,718 | 25,451 | | (558) | | (558) | | 24,893 | | | | 756 | 02/01/2021 |
| 31377T-VP-8 | FNMA DUS POOL #386822 (20/20/19.5) 5.400% | | 12/01/2009 | Paydown | | 64,426 | 64,426 | 66,600 | 66,096 | | (1,670) | | (1,670) | | 64,426 | | | | 1,902 | 02/01/2024 |
| 31377T-VH-5 | FNMA DUS POOL #386848 (30/18/15) 5.280% | | 12/01/2009 | Paydown | | 29,642 | 29,642 | 30,054 | 29,932 | | (290) | | (290) | | 29,642 | | | | 856 | 03/01/2022 |
| 31382F-4Y-2 | FNMA POOL #481539 6.000% 01/01/29 | | 12/01/2009 | Paydown | | 119,425 | 119,425 | 116,178 | 116,594 | | 2,830 | | 2,830 | | 119,425 | | | | 3,374 | 01/01/2029 |
| 31383K-C3-9 | FNMA POOL #505090 8.000% 10/01/27 | | 12/01/2009 | Paydown | | 5,356 | 5,356 | 5,399 | 5,384 | | (28) | | (28) | | 5,356 | | | | 235 | 10/01/2027 |
| 31384D-LH-3 | FNMA POOL #520628 8.000% 11/01/29 | | 12/01/2009 | Paydown | | 826 | 826 | 817 | 818 | | 8 | | 8 | | 826 | | | | 36 | 11/01/2029 |
| 31384L-WU-4 | FNMA POOL #527259 6.500% 11/01/19 | | 12/01/2009 | Paydown | | 137,458 | 137,458 | 127,922 | 131,127 | | 6,331 | | 6,331 | | 137,458 | | | | 5,398 | 11/01/2019 |
| 31384X-DR-6 | FNMA POOL #536612 8.000% 04/01/20 | | 12/01/2009 | Paydown | | 9,846 | 9,846 | 9,772 | 9,779 | | 67 | | 67 | | 9,846 | | | | 418 | 04/01/2020 |
| 31385W-WR-6 | FNMA DUS POOL #555156 (MEGA 30/15) 6.000% 09/01/17 | | 12/01/2009 | Paydown | | 7,966 | 7,966 | 8,202 | 8,101 | | (135) | | (135) | | 7,966 | | | | 262 | 09/01/2017 |
| 31385X-F8-5 | FNMA POOL #555591 5.500% 07/01/33 | | 12/01/2009 | Paydown | | 213,567 | 213,567 | 212,232 | 212,264 | | 1,303 | | 1,303 | | 213,567 | | | | 6,255 | 07/01/2033 |
| 31386T-FM-2 | FNMA (CL) POOL #572672 6.000% 04/01/31 | | 12/01/2009 | Paydown | | 57,167 | 57,167 | 55,274 | 55,372 | | 1,795 | | 1,795 | | 57,167 | | | | 1,660 | 04/01/2031 |
| 31387C-LV-1 | FNMA CL POOL #580040 6.000% 06/01/31 | | 12/01/2009 | Paydown | | 177,696 | 177,696 | 173,309 | 173,558 | | 4,138 | | 4,138 | | 177,696 | | | | 6,024 | 06/01/2031 |
| 31389A-YB-3 | FNMA POOL #620006 6.000% 01/01/32 | | 12/01/2009 | Paydown | | 600,725 | 600,725 | 583,642 | 585,144 | | 15,581 | | 15,581 | | 600,725 | | | | 13,535 | 01/01/2032 |
| 31389A-YC-1 | FNMA POOL #620007 6.000% 01/01/32 | | 12/01/2009 | Paydown | | 37,617 | 37,617 | 36,547 | 36,684 | | 923 | | 923 | | 37,617 | | | | 1,320 | 01/01/2032 |
| 31390M-JS-4 | FNMA POOL #650173 5.000% 11/01/32 | | 12/01/2009 | Paydown | | 1,346,016 | 1,346,016 | 1,342,861 | 1,342,937 | | 3,078 | | 3,078 | | 1,346,016 | | | | 29,784 | 11/01/2032 |
| 31392A-5V-6 | FNMA REMIC SER 2001-76 UC (B-PAC) 5.500% | | 07/01/2009 | Paydown | | 856,751 | 856,751 | 841,598 | 852,467 | | 4,284 | | 4,284 | | 856,751 | | | | 16,928 | 11/25/2015 |
| 31392D-AV-4 | FNMA REMIC SER 2002-M1 C (ACES) 6.170% | | 12/01/2009 | Paydown | | 94,260 | 94,260 | 102,766 | 98,675 | | (4,415) | | (4,415) | | 94,260 | | | | 4,012 | 02/25/2016 |
| 31392H-WT-7 | FNMA REMIC SER 2003-11 PD (B-PAC) 5.500% | | 04/01/2009 | Paydown | | 1,479,400 | 1,479,400 | 1,496,506 | 1,475,596 | | 3,805 | | 3,805 | | 1,479,400 | | | | 19,674 | 05/25/2009 |
| 31392K-LK-0 | FHLMC REMIC SER 2450 PG (BPAC) 6.000% | | 08/21/2009 | Broadpoint | | 532,813 | 500,000 | 525,156 | 513,088 | | (5,095) | | (5,095) | | 507,993 | | 24,820 | 24,820 | 22,083 | 08/15/2014 |
| 31392X-ZN-1 | FHLMC REMIC SER 2528 VB (VADM) 5.500% | | 12/16/2009 | Banc of America Securities | | 5,546,963 | 5,273,405 | 5,289,884 | 5,276,192 | | (8,665) | | (8,665) | | 5,267,528 | | 279,435 | 279,435 | 306,150 | 09/15/2011 |
| 31393C-JN-4 | FNMA REMIC SER 2003-54 PE (PAC) 5.000% | | 08/21/2009 | Various | | 10,397,438 | 9,950,000 | 9,813,188 | 9,873,019 | | 16,479 | | 16,479 | | 9,889,498 | | 507,940 | 507,940 | 350,042 | 08/25/2030 |
| 31393E-B2-4 | FNMA REMIC SER 2003-93 MK (DUS 30/10/9.5) 7.500% 11/25/19 | | 12/01/2009 | Paydown | | 249,008 | 249,008 | 268,850 | 262,666 | | (13,658) | | (13,658) | | 249,008 | | | | 10,260 | 11/25/2019 |
| 31393E-CB-3 | FNMA REMIC SER 2003-74 PT (PAC) 5.000% | | 04/06/2009 | First Tennessee Bank | | 1,231,500 | 1,200,000 | 1,204,688 | 1,199,904 | | (1,493) | | (1,493) | | 1,198,411 | | 33,089 | 33,089 | 21,333 | 07/25/2012 |
| 31393F-5B-8 | FHLMC REMIC SER 2522 PE (BPAC) 5.500% | | 12/17/2009 | Stifel Nicolaus & Co., Inc. | | 2,453,433 | 2,342,878 | 2,366,783 | 2,350,055 | | (6,803) | | (6,803) | | 2,343,251 | | 110,182 | 110,182 | 136,135 | 04/15/2013 |
| 31393F-5B-8 | FHLMC REMIC SER 2522 PE (BPAC) 5.500% | | 12/01/2009 | Paydown | | 2,768,827 | 2,768,827 | 2,796,475 | 2,777,055 | | (8,228) | | (8,228) | | 2,768,827 | | | | 94,500 | 04/15/2013 |
| 31393H-WD-0 | FHLMC REMIC SER 2552 KC (B-PAC) 5.500% | | 04/01/2009 | Paydown | | 3,284,446 | 3,284,446 | 3,317,290 | 3,279,402 | | 5,044 | | 5,044 | | 3,284,446 | | | | 38,877 | 04/15/2009 |
| 31393M-PD-7 | FHLMC REMIC SER 2582 TD (BPAC) 5.000% | | 12/01/2009 | Paydown | | 995,611 | 995,611 | 995,922 | 995,050 | | 560 | | 560 | | 995,611 | | | | 34,777 | 01/15/2010 |
| 31393P-BK-9 | FHLMC REMIC SER 2595 AE (SEQ) 5.000% | | 11/10/2009 | BB&T Capital Markets | | 1,592,344 | 1,500,000 | 1,458,516 | 1,470,295 | | 3,735 | | 3,735 | | 1,474,030 | | 118,314 | 118,314 | 71,875 | 04/15/2018 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|--|---------|---------------|-----------------------------|---------------------------|---------------|------------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 313930-X4-9 | FHLMC REMIC SER 2610 DZ (ACRL) 5.500% | | 12/17/2009 | Keybank MCD | | 1,794,295 | 1,694,730 | 1,631,062 | 1,632,496 | | 11,425 | | 11,425 | | 1,643,921 | | 150,374 | 150,374 | 98,647 | 05/15/2033 |
| 313930-Z4-7 | FHLMC REMIC SER 2611 MZ (PAC-Z) 5.500% | | 10/29/2009 | Robert W. Baird & Co., Inc. | | 325,149 | 305,663 | 307,782 | 307,242 | | (688) | | (688) | | 306,554 | | 18,594 | 18,594 | 15,364 | 01/15/2026 |
| 31393T-BH-8 | FNMA REMIC SER 2003-92 JW (PAC) 5.000% | | 12/16/2009 | RBS Greenwich Capital | | 7,979,323 | 7,638,000 | 7,728,701 | 7,655,910 | | (20,392) | | (20,392) | | 7,635,518 | | 343,806 | 343,806 | 403,117 | 04/25/2012 |
| 31393T-UH-7 | FNMA REMIC SER 2003-102 QB (B-PAC) 5.000% | | 08/21/2009 | Stifel Nicolaus & Co., Inc. | | 681,625 | 665,000 | 663,338 | 663,061 | | (178) | | (178) | | 662,882 | | 18,743 | 18,743 | 24,476 | 12/25/2030 |
| 31393T-UH-7 | FNMA REMIC SER 2003-102 QB (B-PAC) 5.000% | | 12/01/2009 | Paydown | | 438,288 | 438,288 | 437,192 | 437,009 | | 1,278 | | 1,278 | | 438,288 | | | | 21,170 | 12/25/2030 |
| 31393V-JG-7 | FHLMC REMIC SER 2626 TB (PAC) 5.000% | | 06/15/2009 | Morgan Stanley & Co., Inc. | | 5,861,131 | 5,549,000 | 5,569,809 | 5,561,899 | | (7,867) | | (7,867) | | 5,554,032 | | 307,099 | 307,099 | 205,005 | 10/15/2032 |
| 31393W-B0-1 | FHLMC REMIC SER 2640 PV (PAC) 5.000% | | 06/15/2009 | Raymond James & Associates | | 4,498,000 | 4,325,000 | 4,216,199 | 4,257,882 | | 14,154 | | 14,154 | | 4,272,035 | | 225,965 | 225,965 | 159,785 | 06/15/2023 |
| 31393W-SV-2 | FHLMC REMIC SER 2645 NZ (PAC Z) 5.000% | | 12/07/2009 | Various | | 12,058,344 | 11,792,871 | 11,152,496 | 11,190,999 | | 114,232 | | 114,232 | | 11,305,231 | | 753,113 | 753,113 | 492,853 | 07/15/2033 |
| 31393X-ZU-4 | FNMA REMIC SER 2004-17 DZ (Z-PAC) 5.500% | | 04/25/2009 | Banc of America Securities | | 908,963 | 882,489 | 842,249 | 844,285 | | 2,462 | | 2,462 | | 846,746 | | 62,217 | 62,217 | 35,863 | 04/25/2034 |
| 31393Y-ZS-7 | FNMA REMIC SER 2004-44 LT (SEQ) 4.500% | | 06/25/2009 | Performance Trust | | 2,032,578 | 2,000,000 | 1,760,625 | 1,814,084 | | 8,067 | | 8,067 | | 1,822,151 | | 210,427 | 210,427 | 42,500 | 06/25/2024 |
| 31394B-NS-9 | FNMA REMIC SER 2004-87 UC (PAC) 4.500% | | 03/25/2009 | Paydown | | 1,691,994 | 1,691,994 | 1,687,009 | 1,686,948 | | 5,045 | | 5,045 | | 1,691,994 | | | | 66,942 | 03/25/2029 |
| 31394G-H2-2 | FHLMC REMIC SER 2649 KA (SEQ) 4.500% | | 07/15/2009 | Paydown | | 206,583 | 206,583 | 195,514 | 198,944 | | 7,639 | | 7,639 | | 206,583 | | | | 6,071 | 07/15/2018 |
| 31394H-4D-0 | FHLMC REMIC SER 2662 PG (BPAC) 5.500% | | 01/15/2009 | Paydown | | 625,821 | 625,821 | 633,644 | 628,172 | | (2,351) | | (2,351) | | 625,821 | | | | 29,547 | 09/15/2010 |
| 31394H-KR-1 | FHLMC REMIC SER 2656 PD (PAC) 4.500% | | 07/15/2009 | Broadpoint | | 2,243,574 | 2,143,755 | 2,140,071 | 2,140,025 | | (8) | | (8) | | 2,140,016 | | 103,557 | 103,557 | 101,828 | 07/15/2018 |
| 31394H-KR-1 | FHLMC REMIC SER 2656 PD (PAC) 4.500% | | 12/16/2009 | Paydown | | 229,017 | 229,017 | 228,623 | 228,618 | | 399 | | 399 | | 229,017 | | | | 9,975 | 07/15/2018 |
| 31394T-C6-0 | FHLMC REMIC SER 2759 BC 5.000% 08/15/29 | | 10/28/2009 | First Tennessee Bank | | 729,967 | 695,000 | 696,520 | 694,907 | | (465) | | (465) | | 694,442 | | 35,526 | 35,526 | 31,758 | 01/15/2013 |
| 31394W-Y9-3 | FHLMC REMIC SER 2785 ZU (PAC Z - RESEC) 5.000% | | 04/01/2009 | Various | | 7,585,133 | 7,510,032 | 6,717,461 | 6,728,753 | | 21,249 | | 21,249 | | 6,750,002 | | 835,130 | 835,130 | 130,383 | 03/15/2034 |
| 31395D-G5-2 | FANNIE MAE Series 2006-43 Class D 6.000% | | 02/25/2009 | Paydown | | 3,531,081 | 3,531,081 | 3,555,081 | 3,525,066 | | 6,014 | | 6,014 | | 3,531,081 | | | | 69,490 | 07/25/2009 |
| 31395E-QX-8 | FHLMC REMIC SER 2840 OQ (PAC) 4.500% | | 10/15/2009 | Paydown | | 229,676 | 229,676 | 228,815 | 229,131 | | 546 | | 546 | | 229,676 | | | | 7,520 | 10/15/2027 |
| 31395F-E6-7 | FHLMC SER 2836 XQ (PAC) 4.500% | | 09/15/2009 | Paydown | | 4,404,094 | 4,404,094 | 4,403,405 | 4,398,563 | | 5,531 | | 5,531 | | 4,404,094 | | | | 144,155 | 09/15/2027 |
| 31395G-C3-4 | FHLMC SERIES 2852 CLASS NY 5.000% | | 09/15/2009 | Various | | 8,748,156 | 8,500,000 | 8,234,375 | 8,252,769 | | 18,970 | | 18,970 | | 8,271,739 | | 476,417 | 476,417 | 254,611 | 09/15/2033 |
| 31395H-MA-5 | FHLMC 2877 MV 4.750% | | 12/15/2009 | Various | | 8,792,709 | 8,480,365 | 8,554,568 | 8,494,931 | | (10,551) | | (10,551) | | 8,484,380 | | 308,329 | 308,329 | 339,034 | 04/15/2012 |
| 31395H-MA-5 | FHLMC 2877 MV 4.750% | | 12/01/2009 | Paydown | | 3,982,623 | 3,982,623 | 4,017,471 | 3,989,464 | | (6,840) | | (6,840) | | 3,982,623 | | | | 151,894 | 04/15/2012 |
| 31395H-R7-7 | FHLMC SER 2870 Class JG (PAC) 4.750% | | 10/15/2009 | Paydown | | 1,041,982 | 1,041,982 | 1,052,239 | 1,044,234 | | (2,252) | | (2,252) | | 1,041,982 | | | | 46,235 | 11/15/2011 |
| 31395U-PZ-8 | FHLMC 2982 4.500% | | 01/15/2009 | Paydown | | 10,086,612 | 10,086,612 | 9,874,733 | 9,988,855 | | 97,757 | | 97,757 | | 10,086,612 | | | | 235,026 | 01/15/2025 |
| 31395X-MV-4 | FHLMC 3015 DM 5.000% | | 02/15/2009 | BB&T Capital Markets | | 729,094 | 700,000 | 699,648 | 699,274 | | (252) | | (252) | | 699,022 | | 30,072 | 30,072 | 25,764 | 02/15/2031 |
| 31396F-MZ-3 | FHLMC 3074-HC 5.000% | | 04/15/2009 | Various | | 4,321,250 | 4,160,000 | 3,992,950 | 4,027,415 | | 14,997 | | 14,997 | | 4,042,412 | | 278,838 | 278,838 | 189,278 | 04/15/2034 |
| 31396T-XH-1 | FHR 3167 ME 5.750% | | 05/15/2009 | Various | | 4,125,078 | 4,000,000 | 4,028,438 | 4,016,411 | | (16,320) | | (16,320) | | 4,000,091 | | | | 188,728 | 12/15/2010 |
| 31396U-DP-2 | FHR 3192 GB 3192 GB 6.000% | | 01/15/2009 | JP Morgan Securities, Inc. | | 3,684,131 | 3,490,000 | 3,530,353 | 3,520,473 | | (19,770) | | (19,770) | | 3,500,703 | | 183,428 | 183,428 | 200,675 | 09/15/2011 |
| 31396W-E7-7 | FANNIE MAE Series 2007-65 Class PA 6.000% | | 03/25/2009 | Paydown | | 523,268 | 523,268 | 525,312 | 524,294 | | (1,027) | | (1,027) | | 523,268 | | | | 17,177 | 07/25/2012 |
| 31396W-E9-3 | FANNIE MAE SERIES 2007-65 CLASS PC 6.000% | | 07/25/2009 | JP Morgan Securities, Inc. | | 5,130,000 | 4,800,000 | 4,767,000 | 4,769,017 | | 3,581 | | 3,581 | | 4,772,598 | | 357,402 | 357,402 | 212,800 | 07/25/2035 |
| 31396W-GJ-9 | FANNIE MAE SERIES 200755 CLASS PE 6.000% | | 12/25/2009 | Performance Trust | | 3,047,719 | 2,900,000 | 2,912,008 | 2,907,342 | | (1,398) | | (1,398) | | 2,905,944 | | 141,775 | 141,775 | 82,167 | 06/25/2014 |
| 31396W-V8-6 | FANNIE MAE SERIES 200776 CLASS PC 6.000% | | 09/25/2009 | Various | | 6,638,750 | 6,200,000 | 6,352,094 | 6,329,145 | | (52,501) | | (52,501) | | 6,276,644 | | 362,106 | 362,106 | 372,100 | 08/25/2012 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---|---------|---------------|---|---------------------------|---------------|-----------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 001957-AV-1 | AT&T CORP NOTES 6.000% 03/15/09 | | 03/15/2009 | Maturity | | 153,000 | 153,000 | 137,028 | 152,508 | | 492 | | 492 | | 153,000 | | | | 4,590 | 03/15/2009 |
| 02149D-AJ-8 | Countrywide Alt. Loan Trust Series 2006-HY13 Class 3A1 5.911% 01/25/47 | | 12/01/2009 | Paydown | | 1,781,076 | 1,781,076 | 1,758,585 | 1,788,442 | | 22,547 | 29,913 | (7,366) | | 1,781,076 | | | | 52,600 | 03/25/2016 |
| 02149D-AJ-8 | Countrywide Alt. Loan Trust Series 2006-HY13 Class 3A1 5.911% 01/25/47 | | 07/28/2009 | Symetra BOLI U-Life | | 5,653,153 | 5,629,940 | 5,654,626 | 5,653,349 | | (195) | | (195) | | 5,653,153 | | | | 221,041 | 03/25/2016 |
| 023551-AE-4 | HESS CORP UNSEC'D NOTES 7.375% 10/01/09 | | 10/01/2009 | Maturity | | 4,000,000 | 4,000,000 | 3,879,180 | 3,987,312 | | 12,688 | | 12,688 | | 4,000,000 | | | | 295,000 | 10/01/2009 |
| 02666Q-UW-1 | AMERICAN HONDA FINANCE NTS 144A 4.500% 05/26/09 | | 05/26/2009 | Maturity | | 1,500,000 | 1,500,000 | 1,496,805 | 1,499,719 | | 281 | | 281 | | 1,500,000 | | | | 33,750 | 05/26/2009 |
| 032165-AF-9 | AMSOUTH BANCORPORATION UNSEC'D NOTES 6.125% 03/01/09 | | 03/01/2009 | Maturity | | 1,150,000 | 1,150,000 | 1,274,074 | 1,153,760 | | (3,760) | | (3,760) | | 1,150,000 | | | | 35,219 | 03/01/2009 |
| 045424-AB-4 | ASC NOMURA-MEGADEAL SER 1995-D1 A2 (COMM) 7.590% 07/11/27 | | 11/01/2009 | Paydown | | 260,413 | 260,413 | 282,671 | 261,552 | | (1,139) | | (1,139) | | 260,413 | | | | 13,623 | 02/11/2010 |
| 05947U-L9-7 | Banc of America Commercial Mtg 2005-2 AAB 4.742% 07/10/43 | | 12/01/2009 | Paydown | | 2,007,432 | 2,007,432 | 1,998,981 | 1,998,035 | | 9,397 | | 9,397 | | 2,007,432 | | | | 44,115 | 07/10/2043 |
| 05947U-XM-5 | Banc of America Commercial Mtg 2004-5 A2 4.176% 11/10/41 | | 12/01/2009 | Paydown | | 7,149,212 | 7,149,212 | 7,026,657 | 7,089,093 | | 60,119 | | 60,119 | | 7,149,212 | | | | 203,436 | 11/10/2041 |
| 05948X-RE-3 | BOA MTGE SEC SER 2003-6 CLASS 1A30 4.750% 08/25/33 | | 12/01/2009 | Paydown | | 700,890 | 700,890 | 700,124 | 699,412 | | 1,478 | | 1,478 | | 700,890 | | | | 21,278 | 08/25/2033 |
| 05949A-HZ-6 | BOA MTGE SEC SER 2004-F 2A5 (ADJ-SUB) 4.148% 07/25/34 | | 05/29/2009 | Direct | | 3,081,778 | 3,074,226 | 2,983,905 | 3,058,317 | | 15,908 | | 15,908 | | 3,074,226 | | 7,552 | 7,552 | 54,415 | 07/25/2034 |
| 05949A-HZ-6 | BOA MTGE SEC SER 2004-F 2A5 (ADJ-SUB) 4.148% 07/25/34 | | 05/01/2009 | Paydown | | 325,774 | 325,774 | 316,203 | 324,089 | | 1,686 | | 1,686 | | 325,774 | | | | 5,628 | 07/25/2034 |
| 05952C-AE-0 | BANC OF AMERICA COMMERCIAL MOR SERIES 2007-5 CLASS A4 5.492% 02/10/51 | | 12/15/2009 | Barclays Capital, Inc. Credit Suisse First Boston | | 5,585,766 | 6,600,000 | 6,193,945 | 6,222,307 | | 33,535 | | 33,535 | | 6,255,841 | | (670,075) | (670,075) | 379,589 | 02/10/2051 |
| 05952F-AE-3 | BANC OF AMERICA MORTGAGE 2007-2 A5 5.500% 05/25/37 | | 09/24/2009 | Paydown | | 2,644,904 | 3,574,195 | 3,532,663 | 3,534,849 | | 6,142 | | 6,142 | | 3,540,992 | | (896,087) | (896,087) | 149,880 | 05/25/2037 |
| 05952F-AE-3 | BANC OF AMERICA MORTGAGE 2007-2 A5 5.500% 05/25/37 | | 12/01/2009 | Paydown | | 7,897,801 | 7,897,801 | 7,756,985 | 7,810,860 | | 139,627 | 52,685 | 86,942 | | 7,897,801 | | | | 203,834 | 05/25/2037 |
| 05952F-AE-3 | BANC OF AMERICA MORTGAGE 2007-2 A5 5.500% 05/25/37 | | 02/19/2009 | Symetra BOLI U-Life | | 866,217 | 875,906 | 865,728 | 866,263 | | (47) | | (47) | | 866,217 | | | | 10,438 | 05/25/2037 |
| 05952H-AG-4 | BANC OF AMERICA MTG SECURITIES 2007-1 1A7 5.750% 03/25/37 | | 09/22/2009 | Various | | 2,589,168 | 2,724,745 | 2,743,052 | 2,727,222 | | (2,895) | | (2,895) | | 2,724,327 | | (135,159) | (135,159) | 117,762 | 10/25/2011 |
| 05952H-AG-4 | BANC OF AMERICA MTG SECURITIES 2007-1 1A7 5.750% 03/25/37 | | 12/01/2009 | Paydown | | 9,538,380 | 9,538,380 | 9,593,770 | 9,542,580 | | (4,199) | | (4,199) | | 9,538,380 | | | | 250,347 | 03/25/2037 |
| 05952H-AG-4 | BANC OF AMERICA MTG SECURITIES 2007-1 1A7 5.750% 03/25/37 | | 07/28/2009 | Symetra BOLI U-Life | | 8,790,128 | 8,802,019 | 8,832,786 | 8,795,433 | | (5,305) | | (5,305) | | 8,790,128 | | | | 333,193 | 03/25/2037 |
| 05953Y-AY-7 | BANC OF AMERICA FUNDING CORP 2007-4 2A3 5.500% 06/25/37 | | 04/06/2009 | Company | | 1,119,637 | 1,599,482 | 1,597,396 | 1,597,207 | | (19) | | (19) | | 1,597,188 | | (477,550) | (477,550) | 31,279 | 06/25/2037 |
| 05953Y-AY-7 | BANC OF AMERICA FUNDING CORP 2007-4 2A3 5.500% 06/25/37 | | 12/01/2009 | Paydown | | 1,101,554 | 1,101,554 | 1,100,923 | 1,099,987 | | 1,567 | | 1,567 | | 1,101,554 | | | | 28,498 | 06/25/2037 |
| 06050H-AG-5 | BOA MTGE SEC SER 2002-10 2A7 (SUP) 5.000% 11/25/17 | | 12/01/2009 | Paydown | | 22,039 | 22,039 | 22,390 | 22,241 | | (202) | | (202) | | 22,039 | | | | 499 | 10/25/2017 |
| 06050H-ZT-8 | BOA MTGE SEC SER 2002-10 1A34 (SUP/BPAC) 6.000% 11/25/32 | | 12/01/2009 | Paydown | | 40,095 | 40,095 | 40,897 | 40,648 | | (553) | | (553) | | 40,095 | | | | 1,226 | 08/25/2032 |
| 066050-CV-5 | BANKAMERICA CORP SR NOTES 5.875% 02/15/09 | | 02/15/2009 | Maturity | | 400,000 | 400,000 | 365,032 | 399,378 | | 622 | | 622 | | 400,000 | | | | 11,750 | 02/15/2009 |
| 07383F-5J-3 | BEAR STEARNS COMM'L MTGE SER 2005-T18 AAB 4.823% 02/13/42 | | 12/16/2009 | Raymond James & Associates | | 2,420,085 | 2,370,000 | 2,382,933 | 2,374,875 | | (2,374) | | (2,374) | | 2,372,502 | | 47,583 | 47,583 | 120,655 | 04/13/2014 |
| 07387B-CK-7 | Bear Stearns Commercial Mtg 2005-T20 AAB 5.133% 10/12/42 | | 12/16/2009 | Raymond James & Associates | | 1,508,933 | 1,460,000 | 1,468,014 | 1,463,681 | | (1,470) | | (1,470) | | 1,462,212 | | 46,721 | 46,721 | 80,027 | 06/12/2014 |
| 07388Q-AE-9 | BEAR STEARNS COMMERCIAL MORTGA SERIES 2007P117 CLASS A4 5.694% 06/11/50 | | 10/07/2009 | RBS Greenwich Capital | | 2,740,313 | 3,000,000 | 2,647,305 | 2,873,341 | | 9,976 | 234,755 | (224,779) | | 2,648,562 | | 91,750 | 91,750 | 148,044 | 06/11/2050 |
| 07388V-AE-8 | BEAR STEARNS COMMERCIAL MORTGA SERIES 2007T26 CLASS A4 5.471% 01/12/45 | | 08/19/2009 | RBS Greenwich Capital | | 4,233,305 | 4,700,000 | 4,241,383 | 4,255,073 | | 27,060 | | 27,060 | | 4,282,133 | | (48,829) | (48,829) | 187,853 | 01/12/2045 |
| 12513E-AF-1 | Citigroup / Deutsche Bank 2005-CD1 ASB 5.224% 07/15/44 | | 12/16/2009 | Raymond James & Associates | | 2,063,556 | 2,000,000 | 2,006,892 | 2,002,595 | | (1,521) | | (1,521) | | 2,001,074 | | 62,482 | 62,482 | 111,938 | 01/15/2015 |
| 12543P-AJ-2 | Countrywide Home Loan Mortgage 2006-21 A9 5.750% 02/25/37 | | 08/19/2009 | Various | | 4,521,135 | 4,659,462 | 4,679,506 | 4,653,929 | | (4,483) | | (4,483) | | 4,649,446 | | (128,312) | (128,312) | 195,730 | 09/25/2010 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---|---------|---------------|-----------------------------|---------------------------|---------------|------------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 12543P-AJ-2 | Countrywide Home Loan Mortgage 2006-21 A9 | | 12/01/2009 | Paydown | | 7,886,194 | 7,886,194 | 7,920,482 | 7,876,948 | | 9,247 | | 9,247 | | 7,886,194 | | | | 221,407 | 09/25/2010 |
| 126650-AW-0 | CVS CORP 144A 5.298% 01/11/27 | | 12/10/2009 | Various | | 902,633 | 902,633 | 902,982 | 877,185 | | 265 | | 265 | | 877,450 | | 25,183 | 25,183 | 26,113 | 01/11/2027 |
| 12667F-6C-4 | Countrywide Alternative Loan T 2005-J2 1A7 5.500% 04/25/35 | | 09/22/2009 | Credit Suisse First Boston | | 630,000 | 1,000,000 | 1,004,063 | 1,003,279 | | (592) | | (592) | | 1,002,688 | | (372,688) | (372,688) | 44,917 | 03/25/2035 |
| 126694-TX-6 | COUNTRYWIDE HOME LOANS 2005-30 A8 5.500% 01/25/36 | | 10/14/2009 | Various | | 6,391,219 | 8,536,000 | 7,914,758 | 8,197,064 | | 25,393 | 251,718 | (226,325) | | 7,970,739 | | (1,579,520) | (1,579,520) | 352,644 | 01/25/2036 |
| 126694-TX-6 | COUNTRYWIDE HOME LOANS 2005-30 A8 5.500% 01/25/36 | | 09/29/2009 | Symetra BOLI U-Life | | 2,194,908 | 2,250,000 | 2,175,029 | 2,186,049 | | 8,859 | | 8,859 | | 2,194,908 | | | | 102,438 | 01/25/2036 |
| 126694-W4-6 | COUNTRYWIDE HOME LOANS 2006-9 A3 6.000% 05/25/36 | | 08/19/2009 | Guggenheim | | 1,995,000 | 2,850,000 | 2,878,277 | 2,866,657 | | (3,012) | | (3,012) | | 2,863,644 | | (868,644) | (868,644) | 124,925 | 09/25/2014 |
| 126694-W4-6 | COUNTRYWIDE HOME LOANS 2006-9 A3 6.000% 05/25/36 | | 07/28/2009 | Symetra BOLI U-Life | | 1,286,279 | 1,280,000 | 1,292,700 | 1,287,481 | | (1,201) | | (1,201) | | 1,286,279 | | | | 50,560 | 09/25/2014 |
| 126694-X5-2 | COUNTRYWIDE HOME LOANS 2006-9 A12 6.000% 05/25/36 | | 07/28/2009 | Symetra BOLI U-Life | | 501,384 | 500,000 | 502,781 | 501,645 | | (262) | | (262) | | 501,384 | | | | 19,750 | 03/25/2016 |
| 12669D-4H-8 | COUNTRYWIDE HOME LOANS SER 2003-11 A6 (B-PAC/SUB) 5.000% 05/25/33 | | 12/01/2009 | Paydown | | 1,386,870 | 1,386,870 | 1,386,870 | 1,386,870 | | | | | | 1,386,870 | | | | 56,205 | 05/25/2033 |
| 12669D-QF-8 | COUNTRYWIDE HOME LOANS SER 2002-32 1A21 (SUPP/MEZZ) 6.000% 01/25/33 | | 12/01/2009 | Paydown | | 175,398 | 175,398 | 178,906 | 176,597 | | (1,200) | | (1,200) | | 175,398 | | | | 5,642 | 03/25/2032 |
| 12669E-ST-4 | COUNTRYWIDE HOME LOANS SER 2003-28 A2 (PAC-SUB) 4.150% 08/25/33 | | 12/01/2009 | Paydown | | 1,572,302 | 1,572,302 | 1,571,320 | 1,569,902 | | 2,401 | | 2,401 | | 1,572,302 | | | | 38,200 | 08/25/2033 |
| 12669F-F3-2 | COUNTRY WIDE HOME LOANS SER 2004-J5 A5 (NAS) 5.500% 07/25/34 | | 12/01/2009 | Paydown | | 79,097 | 79,097 | 76,205 | 76,875 | | 2,221 | | 2,221 | | 79,097 | | | | 3,203 | 07/25/2034 |
| 12669G-2V-2 | Countrywide Home Loans 2005-16 A3 5.500% 09/25/35 | | 08/19/2009 | Jefferies & Co., Inc. | | 4,126,800 | 5,430,000 | 5,232,200 | 5,263,493 | | 11,768 | | 11,768 | | 5,275,262 | | (1,148,462) | (1,148,462) | 218,180 | 09/25/2035 |
| 12669G-2V-2 | Countrywide Home Loans 2005-16 A3 5.500% 09/25/35 | | 09/29/2009 | Symetra BOLI U-Life | | 1,191,167 | 1,220,000 | 1,177,300 | 1,184,029 | | 7,139 | | 7,139 | | 1,191,167 | | | | 55,544 | 09/25/2035 |
| 141781-AH-7 | CARGILL INC NOTES 144A 6.300% 04/15/09 | | 04/15/2009 | Maturity | | 4,000,000 | 4,000,000 | 3,655,360 | 3,985,620 | | 14,380 | | 14,380 | | 4,000,000 | | | | 126,000 | 04/15/2009 |
| 141781-AS-3 | CARGILL INC NTS 144A 3.625% 03/04/09 | | 03/04/2009 | Maturity | | 3,000,000 | 3,000,000 | 2,908,380 | 2,990,188 | | 9,812 | | 9,812 | | 3,000,000 | | | | 54,375 | 03/04/2009 |
| 15640P-AA-6 | CENTURA BANK SUB NTS 6.500% 03/15/09 | | 03/15/2009 | Maturity | | 135,000 | 135,000 | 147,046 | 135,573 | | (573) | | (573) | | 135,000 | | | | 4,388 | 03/15/2009 |
| 161630-BX-5 | 5.944% 03/25/37 | | 12/01/2009 | Paydown | | 749,225 | 749,225 | 750,132 | 748,161 | | 1,064 | | 1,064 | | 749,225 | | | | 23,240 | 07/25/2011 |
| 172973-4J-5 | CITICORP MTG SEC INC 2005-8 2A3 5.000% 11/25/20 | | 08/19/2009 | Guggenheim | | 5,028,500 | 5,650,000 | 5,456,664 | 5,510,542 | | 20,963 | | 20,963 | | 5,531,504 | | (503,004) | (503,004) | 206,382 | 11/25/2020 |
| 172973-4J-5 | CITICORP MTG SEC INC 2005-8 2A3 5.000% 11/25/20 | | 09/29/2009 | Symetra BOLI U-Life | | 1,079,482 | 1,100,000 | 1,062,359 | 1,072,849 | | 6,634 | | 6,634 | | 1,079,482 | | | | 45,528 | 11/25/2020 |
| 17313K-AF-8 | CITIGROUP COMMERCIAL MORTGAGE SERIES 2008C7 CLASS A4 6.092% 12/10/49 | | 10/07/2009 | Cantor Fitzgerald & Company | | 1,847,188 | 2,000,000 | 1,800,620 | 1,998,317 | | 565 | 197,592 | (197,027) | | 1,801,289 | | 45,898 | 45,898 | 107,010 | 12/10/2049 |
| 20029P-AM-1 | COMCAST CABLE CORP SR NOTES 6.875% 06/15/09 | | 06/15/2009 | Maturity | | 3,250,000 | 3,250,000 | 3,239,795 | 3,249,273 | | 727 | | 727 | | 3,250,000 | | | | 111,719 | 06/15/2009 |
| 20173V-AE-0 | GREENWICH CAPITAL COMMERCIAL F SERIES 2007G611 CLASS A4 5.736% 12/10/49 | | 12/15/2009 | JP Morgan Securities, Inc. | | 11,307,000 | 12,800,000 | 12,709,250 | 12,712,850 | | 6,410 | | 6,410 | | 12,719,259 | | (1,412,259) | (1,412,259) | 768,879 | 12/10/2049 |
| 209111-CW-1 | CONS EDISON NY DEBS 7.100% 02/01/28 | | 12/31/2009 | Call | 103.0340 | 1,287,925 | 1,250,000 | 1,245,525 | 1,246,234 | | 97 | | 97 | | 1,246,331 | | 41,594 | 41,594 | 125,729 | 02/01/2028 |
| 210371-AJ-9 | CONSTELLATION ENERGY GRP BASIC 6.125% 09/01/09 | | 09/01/2009 | Maturity | | 3,000,000 | 3,000,000 | 3,028,350 | 3,008,948 | | (8,948) | | (8,948) | | 3,000,000 | | | | 183,750 | 09/01/2009 |
| 216669-AG-6 | COOPER INDS LTD CL A UNSEC'D SR NTS 5.500% 11/01/09 | | 11/01/2009 | Maturity | | 4,500,000 | 4,500,000 | 4,475,205 | 4,496,543 | | 3,457 | | 3,457 | | 4,500,000 | | | | 247,500 | 11/01/2009 |
| 22541Q-PU-0 | CSFB MTGE SECURITIES CORP SER 2003-21 1A21 (PAC) 5.250% 09/25/33 | | 12/01/2009 | Paydown | | 924,340 | 924,340 | 908,164 | 915,009 | | 9,332 | | 9,332 | | 924,340 | | | | 28,510 | 09/25/2033 |
| 22541S-2R-8 | CS FIRST BOSTON MORTGAGE SEC Series 2004-C5 Class AAB 4.587% 11/15/37 | | 12/01/2009 | Paydown | | 294 | 294 | 295 | 294 | | | | | | 294 | | | | 13 | 11/15/2037 |
| 22545L-AD-1 | CREDIT SUISSE MORTGAGE CAPITAL SERIES 2006-C5 CLASS A3 5.311% 12/15/39 | | 12/30/2009 | Symetra BOLI U-Life | | 857,512 | 1,050,000 | 852,376 | 1,018,977 | | 7,449 | 168,913 | (161,464) | | 857,512 | | | | 60,258 | 12/15/2039 |
| 23322B-GA-0 | DLJ MTG SER 1999-CG3 A1C (C.SUB) 7.440% 10/10/32 | | 07/01/2009 | Paydown | | 1,000,000 | 1,000,000 | 971,367 | 995,451 | | 4,549 | | 4,549 | | 1,000,000 | | | | 43,400 | 10/10/2032 |
| 23383V-DJ-6 | DAIMLER CHRYSLER AUTO TRUST Series 2006-A 5.000% 05/08/10 | | 05/08/2009 | Paydown | | 595,858 | 595,858 | 594,275 | 595,564 | | 294 | | 294 | | 595,858 | | | | 6,340 | 05/08/2010 |
| 263534-BJ-7 | DUPONT (EI) DE NEMOURS NOTES 6.875% 10/15/09 | | 10/15/2009 | Maturity | | 1,000,000 | 1,000,000 | 1,037,820 | 1,016,759 | | (16,759) | | (16,759) | | 1,000,000 | | | | 68,750 | 10/15/2009 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|--|---------|---------------|----------------------------|---------------------------|---------------|------------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 26441Y-AE-7 | DUKE REALTY CORP NTS 5.250% 01/15/10 | | 09/14/2009 | Tender Offer | | 1,012,500 | 1,000,000 | 1,006,910 | 1,001,448 | | | (975) | (975) | | 1,000,473 | | 12,027 | 12,027 | 61,104 | 01/15/2010 |
| 26882P-BD-3 | ERAC USA FINANCE CO Series 144A 5.800% 10/15/12 | | 02/19/2009 | Symetra BOLI U-Life | | 750,657 | 750,000 | 750,870 | 750,679 | | | (22) | (22) | | 750,657 | | | | 14,983 | 10/15/2012 |
| 31410H-AP-6 | FEDERATED DEPT STORES NTS 6.300% 04/01/09 | | 04/01/2009 | Maturity | | 1,000,000 | 1,000,000 | 1,077,530 | 1,004,487 | | | (4,487) | (4,487) | | 1,000,000 | | | | 31,500 | 04/01/2009 |
| 32052R-AG-5 | FIRST HORIZON MTG PASS-THROUGH 2006-3 1A7 6.250% 11/25/36 | | 12/01/2009 | Paydown | | 1,092,912 | 1,092,912 | 1,102,645 | 1,095,288 | | | (2,377) | (2,377) | | 1,092,912 | | | | 34,978 | 03/25/2010 |
| 36228F-QL-3 | GSR MORTGAGE LOAN TRUST SER 2003-4F 2A5 (BPAC-SUB) 5.750% 05/25/33 | | 12/01/2009 | Paydown | | 1,116,226 | 1,116,226 | 1,121,807 | 1,118,083 | | | (1,857) | (1,857) | | 1,116,226 | | | | 43,638 | 12/25/2032 |
| 362636-AM-4 | GSR MORTGAGE LOAN TRUST SERIES 20072F CLASS 2A7 5.750% 02/25/37 | | 02/19/2009 | Symetra BOLI U-Life | | 968,810 | 985,000 | 968,032 | 968,959 | | | (149) | (149) | | 968,810 | | | | 12,271 | 02/25/2037 |
| 364725-AC-5 | GANNETT CO INC NOTES 6.375% 04/01/12 | | 04/08/2009 | Various | | 917,100 | 1,495,000 | 928,377 | 1,571,362 | | | (2,444) | (640,097) | | 931,265 | | (14,165) | (14,165) | 49,685 | 04/01/2012 |
| 44108P-AP-8 | HOST MARRIOTT POOL TRUST 1999-HMTA B (COMM-144A) 7.300% 08/03/15 | | 05/01/2009 | Paydown | | 10,000,000 | 10,000,000 | 9,790,625 | 9,978,594 | | | 21,406 | 21,406 | | 10,000,000 | | | | 304,167 | 08/03/2015 |
| 45660N-QI-8 | RESIDENTIAL ASSET SECURITIZATI SER 2003-A6 A6 (ACRL-SUB) 5.500% 07/25/33 | | 09/24/2009 | Guggenheim | | 353,210 | 543,400 | 538,377 | 537,799 | | | 1,544 | 1,544 | | 539,343 | | (186,133) | (186,133) | 24,740 | 07/25/2033 |
| 459200-AG-6 | INTL BUSINESS MACHINES DEB 8.375% 11/01/19 | | 01/15/2009 | Barclays Capital, Inc. | | 4,315,395 | 3,500,000 | 4,050,690 | 3,882,519 | | | (1,327) | (1,327) | | 3,881,192 | | 434,203 | 434,203 | 65,139 | 11/01/2019 |
| 460146-BD-5 | INTERNATIONAL PAPER CO 5.850% 10/30/12 | | 05/18/2009 | Tender Offer | | 1,242,360 | 1,218,000 | 1,285,843 | 1,256,206 | | | (3,491) | (3,491) | | 1,252,715 | | (10,355) | (10,355) | 39,585 | 10/30/2012 |
| 46629Y-AC-3 | JP MORGAN CHASE COMMERCIAL MOR SERIES 2007CB18 CLASS A4 5.440% 06/12/47 | | 11/18/2009 | JP Morgan Securities, Inc. | | 2,334,656 | 2,700,000 | 2,695,676 | 2,695,649 | | | (13) | (13) | | 2,695,635 | | (360,979) | (360,979) | 143,616 | 06/12/2047 |
| 46630G-BC-8 | JP MORGAN MORTGAGE TRUST 5.290% 07/25/35 | | 12/01/2009 | Paydown | | 3,453,013 | 3,453,013 | 3,427,250 | 3,431,737 | | | 21,276 | 21,276 | | 3,453,013 | | | | 86,570 | 07/25/2035 |
| 46630G-BC-8 | JP MORGAN MORTGAGE TRUST 2007-A2 3A1 5.815% 04/25/37 | | 07/28/2009 | Symetra BOLI U-Life | | 6,794,693 | 6,837,022 | 6,786,012 | 6,794,895 | | | (202) | (202) | | 6,794,693 | | | | 238,411 | 07/25/2035 |
| 46630P-AP-0 | JP MORGAN MORTGAGE TRUST 2007-A2 3A1 5.815% 04/25/37 | | 07/01/2009 | Paydown | | 471,863 | 471,863 | 469,061 | 469,285 | | | 2,578 | 2,578 | | 471,863 | | | | 9,879 | 04/25/2037 |
| 46630P-AP-0 | JP MORGAN MORTGAGE TRUST 2007-A2 3A1 5.815% 04/25/37 | | 07/28/2009 | Symetra BOLI U-Life | | 2,311,802 | 2,324,349 | 2,310,548 | 2,311,650 | | | 152 | 152 | | 2,311,802 | | | | 89,469 | 04/25/2037 |
| 49228R-AE-3 | KERN RIVER FUNDING CORP CO GTY SR NTS 144A 4.893% 04/30/18 | | 12/31/2009 | Redemption | | 70,200 | 70,200 | 71,031 | 70,790 | | | (27) | (27) | | 70,763 | | (563) | (563) | 1,860 | 04/30/2018 |
| 52108H-SZ-8 | LB-UBS COMMERCIAL MTGE TRUST 2003-C5 A3 4.254% 07/15/27 | | 12/11/2009 | Paydown | | 1,812,999 | 1,812,999 | 1,770,839 | 1,795,133 | | | 17,866 | 17,866 | | 1,812,999 | | | | 53,515 | 07/15/2027 |
| 52109R-BM-2 | LB-UBS Commercial Mortgage Tru SERIES 2007C7 CLASS A3 5.866% 09/15/45 | | 11/18/2009 | Greenwich Mortgages, Inc. | | 11,720,939 | 13,450,000 | 13,131,100 | 13,144,499 | | | 24,501 | 24,501 | | 13,169,000 | | (1,448,061) | (1,448,061) | 749,528 | 09/15/2045 |
| 55262T-EB-5 | MBNA MASTER TRUST 1999-B A (ABS-BULLET) 5.900% 08/15/11 | | 03/15/2009 | Call | 100,000 | 1,500,000 | 1,500,000 | 1,353,984 | 1,495,676 | | | 4,324 | 4,324 | | 1,500,000 | | | | 22,125 | 08/15/2011 |
| 55274S-AK-7 | MASTER ASSET SECURITIZATION 2006-3 1A10 6.000% 10/25/36 | | 08/19/2009 | Credit Suisse First Boston | | 670,865 | 780,076 | 784,220 | 781,925 | | | (603) | (603) | | 781,322 | | (110,457) | (110,457) | 34,193 | 04/25/2012 |
| 55274S-AK-7 | MASTER ASSET SECURITIZATION 2006-3 1A10 6.000% 10/25/36 | | 12/01/2009 | Paydown | | 1,364,103 | 1,364,103 | 1,371,350 | 1,367,337 | | | (3,234) | (3,234) | | 1,364,103 | | | | 40,347 | 04/25/2012 |
| 55274S-AK-7 | MASTER ASSET SECURITIZATION 2006-3 1A10 6.000% 10/25/36 | | 07/28/2009 | Symetra BOLI U-Life | | 924,274 | 922,758 | 927,660 | 924,946 | | | (672) | (672) | | 924,274 | | | | 36,449 | 04/25/2012 |
| 57643M-LY-8 | Mastr Asset Securitization 2006-1 1A2 5.750% 05/25/36 | | 09/22/2009 | Various | | 15,222,125 | 17,100,000 | 17,129,391 | 17,101,551 | | | (19,520) | (19,520) | | 17,082,031 | | (1,859,906) | (1,859,906) | 730,581 | 08/25/2012 |
| 590188-JP-4 | MERRILL LYNCH & CO. INC. SR UNSUB 6.000% 02/17/09 | | 02/17/2009 | Maturity | | 1,400,000 | 1,400,000 | 1,484,392 | 1,402,546 | | | (2,546) | (2,546) | | 1,400,000 | | | | 42,000 | 02/17/2009 |
| 617059-GY-0 | JP MORGAN COMM MTG FINANCE SER 2000-C9 A2 (COMM) 7.770% 10/15/32 | | 10/01/2009 | Paydown | | 1,191,300 | 1,191,300 | 1,187,577 | 1,187,685 | | | 3,615 | 3,615 | | 1,191,300 | | | | 58,494 | 10/15/2032 |
| 61745M-W3-3 | MORGAN STANLEY CAPITAL I 2005-T17 AAB 4.630% 12/13/41 | | 12/01/2009 | Paydown | | 1,576 | 1,576 | 1,584 | 1,579 | | | (3) | (3) | | 1,576 | | | | 73 | 06/13/2014 |
| 61756U-AE-1 | MORGAN STANLEY CAPITAL I SERIES 20071Q16 CLASS A4 5.809% 12/12/49 | | 09/21/2009 | Various | | 3,576,328 | 4,200,000 | 4,142,906 | 4,144,785 | | | 3,204 | 3,204 | | 4,147,990 | | (571,662) | (571,662) | 184,048 | 12/12/2049 |
| 633072-AC-7 | NATIONAL BANK CANADA NY 7.750% 11/01/09 | | 11/01/2009 | Maturity | | 8,550,000 | 8,550,000 | 8,471,878 | 8,531,699 | | | 18,301 | 18,301 | | 8,550,000 | | | | 662,625 | 11/01/2009 |
| 634902-JB-7 | NATIONAL CITY BANK NTS 2.700% 08/24/09 | | 08/24/2009 | Redemption | 100,000 | 636,364 | 636,364 | 637,117 | 636,462 | | | (64) | (64) | | 636,398 | | (35) | (35) | 12,886 | 08/24/2009 |
| 634902-JZ-4 | NATIONAL CITY BANK NTS 4.150% 08/01/09 | | 08/01/2009 | Maturity | | 3,000,000 | 3,000,000 | 2,995,410 | 2,999,418 | | | 582 | 582 | | 3,000,000 | | | | 124,500 | 08/01/2009 |
| 637432-BS-3 | NATL RURAL UTIL CO-OP COLL TRUST 7.350% 11/01/26 | | 11/01/2009 | Redemption | 100,000 | 25,000 | 25,000 | 25,268 | 25,159 | | | (9) | (9) | | 25,151 | | (151) | (151) | 1,838 | 11/01/2026 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---|---------|---------------|------------------------|---------------------------|---------------|------------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 655356-JK-0 | NOMURA ASC 1998-D6 A2 (COMM) 6.992% | | 12/07/2009 | Barclays Capital, Inc. | | 6,914,534 | 6,180,589 | 6,308,289 | 6,227,934 | | (10,473) | | (10,473) | | 6,217,461 | | 697,073 | 697,073 | 437,330 | 02/15/2013 |
| 693476-AL-7 | PNC FUNDING CORP SUB 6.125% 02/15/09 | | 02/15/2009 | Maturity | | 10,277,000 | 10,277,000 | 10,007,099 | 10,271,701 | | 5,299 | | 5,299 | | 10,277,000 | | | 314,733 | 02/15/2009 | |
| 693476-AP-8 | PNC FUNDING CORP SUB NOTES 7.500% | | 11/01/2009 | Maturity | | 5,435,000 | 5,435,000 | 5,603,303 | 5,456,125 | | (21,125) | | (21,125) | | 5,435,000 | | | 407,625 | 11/01/2009 | |
| 713411-AB-2 | PEPSI BOTTLING HLDG INC NTS (GUAR:PEPSI)144A 5.625% 02/17/09 | | 02/17/2009 | Maturity | | 7,200,000 | 7,200,000 | 6,267,072 | 7,182,035 | | 17,965 | | 17,965 | | 7,200,000 | | | 202,500 | 02/17/2009 | |
| 71713U-AQ-5 | PHARMACIA CORPORATION DEBS 6.500% | | 12/01/18 | First Tennessee Bank | | | | | | | | | (54) | 1,513,209 | | 265,311 | 265,311 | 13,542 | 12/01/2018 | |
| 742741-AA-9 | PROCTER & GAMBLE ESOP DEB 9.360% | | 01/01/21 | 100.0000 | | 199,850 | 199,850 | 233,165 | 232,831 | | (633) | | (633) | 232,198 | | (32,348) | (32,348) | 14,141 | 08/01/2020 | |
| 74436J-FC-6 | PRU SEC SECURED FINANCING CORP 1999-C2 B (C_BULLET-ADJ) 7.594% 06/16/31 | | 05/01/2009 | Paydown | | 2,476,000 | 2,476,000 | 2,463,233 | 2,468,627 | | 7,373 | | 7,373 | | 2,476,000 | | | 69,057 | 06/16/2031 | |
| 759940-AG-5 | REGIONS FINANCIAL NTS 6.375% 05/15/12 | | 09/15/2009 | Various | | 1,395,000 | 1,500,000 | 1,496,175 | 1,498,435 | | 304 | | 304 | | 1,498,739 | | (103,739) | (103,739) | 80,484 | 05/15/2012 |
| 76110V-RC-4 | RESIDENTIAL FUNDING MTG 2005-H11 A4 4.700% 08/25/34 | | 12/01/2009 | Paydown | | 361,456 | 361,456 | 357,036 | 359,093 | | 2,363 | | 2,363 | | 361,456 | | | 9,028 | 08/25/2034 | |
| 795770-AK-2 | SALTON SEA FUNDING CORP SR SERIES E 8.300% 05/30/11 | | 11/30/2009 | Redemption | | 100.0000 | 185,300 | 185,300 | 186,632 | | (111) | | (111) | | 185,582 | | (282) | (282) | 11,535 | 05/30/2011 |
| 845335-BW-7 | SOUTHWESTERN BELL TEL DEBS 7.200% | | 10/15/2009 | Call | 102.1225 | 10,212,250 | 10,000,000 | 10,416,300 | 10,176,103 | | (16,469) | | (16,469) | | 10,159,634 | | 52,616 | 52,616 | 720,000 | 10/15/2026 |
| 845335-BX-5 | SOUTHWESTERN BELL TEL DEBS 7.375% | | 07/15/27 | Various | | 6,166,320 | 6,000,000 | 6,203,460 | 6,122,925 | | (8,076) | | (8,076) | | 6,114,849 | | 51,471 | 51,471 | 532,229 | 07/15/2027 |
| 852060-AF-9 | SPRINT CAP CORP 6.375% 05/01/09 | | 05/01/2009 | Maturity | | 1,000,000 | 1,000,000 | 943,510 | 997,417 | | 2,583 | | 2,583 | | 1,000,000 | | | 31,875 | 05/01/2009 | |
| 871928-AX-5 | TIERS CORP BND BKD CTF-AGC 144A 8.125% | | 09/15/2009 | Redemption | | 100.0000 | 158,802 | 158,802 | 181,471 | | (878) | | (878) | | 171,913 | | (13,111) | (13,111) | 9,741 | 09/15/2017 |
| 88031R-AA-6 | TENASKA ALABAMA II PART SR SEC'D BONDS 144A 6.125% 03/30/23 | | 12/30/2009 | Redemption | | 100.0000 | 70,905 | 70,905 | 70,905 | | | | | | 70,905 | | | 2,714 | 03/30/2023 | |
| 881685-BJ-9 | TEXACO CAPITAL INC NOTES 5.500% 01/15/09 | | 01/15/2009 | Maturity | | 2,000,000 | 2,000,000 | 1,770,260 | 1,998,686 | | 1,314 | | 1,314 | | 2,000,000 | | | 55,000 | 01/15/2009 | |
| 88947E-AC-4 | TOLL BROTHERS INC NTS 5.950% 09/15/13 | | 09/02/2009 | Various | | 4,518,588 | 4,570,000 | 4,540,935 | 4,554,305 | | 2,012 | | 2,012 | | 4,556,317 | | (37,729) | (37,729) | 266,628 | 09/15/2013 |
| 913017-AW-9 | UNITED TECHNOLOGIES NOTES 6.500% | | 06/01/2009 | Maturity | | 925,000 | 925,000 | 940,298 | 925,992 | | (992) | | (992) | | 925,000 | | | 30,063 | 06/01/2009 | |
| 91324P-AK-8 | UNITEDHEALTH GROUP INC BASIC 4.125% | | 08/15/2009 | Various | | 13,500,000 | 13,500,000 | 13,197,690 | 13,412,155 | | 87,845 | | 87,845 | | 13,500,000 | | | 556,875 | 08/15/2009 | |
| 931142-BE-2 | WAL-MART STORES INC SR NOTES 6.875% | | 08/10/2009 | Various | | 3,550,000 | 3,550,000 | 3,505,442 | 3,558,376 | | (8,376) | | (8,376) | | 3,550,000 | | | 244,063 | 08/10/2009 | |
| 94106L-AE-9 | WASTE MANAGEMENT INC SR UNSEC'D 6.875% | | 05/15/2009 | Maturity | | 4,000,000 | 4,000,000 | 3,920,834 | 3,995,803 | | 4,197 | | 4,197 | | 4,000,000 | | | 137,500 | 05/15/2009 | |
| 94984H-AA-3 | Wells Fargo Series 2006-12 A1 6.000% | | 10/25/36 | Paydown | | 6,562,657 | 6,562,657 | 6,600,883 | 6,570,075 | | (7,418) | | (7,418) | | 6,562,657 | | | 200,724 | 02/25/2011 | |
| 94984H-AA-3 | Wells Fargo Series 2006-12 A1 6.000% | | 10/25/36 | | | 768,618 | 768,609 | 772,688 | 769,280 | | (662) | | (662) | | 768,618 | | | 24,852 | 02/25/2011 | |
| 961548-AQ-7 | WESTVACO CORP DEB 7.650% 03/15/27 | | 02/19/2009 | Symetra BOLI U-Life | | 2,142,346 | 2,035,000 | 2,212,513 | 2,143,524 | | (1,178) | | (1,178) | | 2,142,346 | | | 66,595 | 03/15/2027 | |
| 961548-AS-3 | WESTVACO CORP DEB 7.500% 06/15/27 | | 06/15/2009 | Various | | 175,000 | 175,000 | 188,440 | 184,486 | | (378) | | (378) | | 184,108 | | (9,108) | (9,108) | 6,563 | 06/15/2027 |
| 962166-AW-4 | WEYERHAEUSER CO DEBS 6.950% 10/01/27 | | 07/28/2009 | Symetra BOLI U-Life | | 3,258,338 | 3,500,000 | 3,214,260 | 3,254,870 | | 3,467 | | 3,467 | | 3,258,338 | | | 200,681 | 10/01/2027 | |
| 971807-AC-6 | WILMINGTON TRUST CORPORATION NTS 4.875% | | 04/15/13 | Symetra BOLI U-Life | | 4,831,502 | 5,000,000 | 4,775,200 | 4,813,970 | | 17,533 | | 17,533 | | 4,831,502 | | | 162,500 | 04/15/2013 | |
| 989701-AJ-6 | ZIONS BANCORP 6.000% 09/15/15 | | 12/14/2009 | Boston | | 1,360,000 | 2,000,000 | 2,094,420 | 2,070,350 | | (8,601) | | (8,601) | | 2,061,749 | | (701,749) | (701,749) | 150,667 | 09/15/2015 |
| 989701-AM-9 | ZIONS BANCORP BASIC 5.500% 11/16/15 | | 07/28/2009 | Various | | 8,641,488 | 8,700,000 | 8,630,332 | 8,637,207 | | 4,282 | | 4,282 | | 8,641,488 | | | 302,103 | 11/16/2015 | |
| 136385-AB-7 | CANADIAN NATL RESOURCES NTS 6.700% | | 02/19/2009 | Symetra BOLI U-Life | | 491,471 | 475,000 | 499,534 | 492,340 | | (869) | | (869) | | 491,471 | | | 18,918 | 07/15/2011 | |
| 03746W-AB-8 | APACHE FIN PTY SR NOTES 7.000% 03/15/09 | F | 03/15/2009 | Maturity | | 1,500,000 | 1,500,000 | 1,413,300 | 1,497,384 | | 2,616 | | 2,616 | | 1,500,000 | | | 52,500 | 03/15/2009 | |
| 26054C-BR-3 | DOW CAPITAL BV NOTES SER G 8.640% | F | 02/19/2009 | Symetra BOLI U-Life | | 601,607 | 500,000 | 622,585 | 602,270 | | (662) | | (662) | | 601,607 | | | 9,360 | 06/01/2022 | |
| 4041A2-AF-1 | JP Morgan Securities, Inc. | F | 12/15/2009 | | | 3,156,800 | 4,000,000 | 3,945,230 | 3,949,193 | | 876 | | 876 | | 3,950,069 | | (793,269) | (793,269) | 271,333 | 11/01/2033 |
| 656531-AH-3 | HBOS PLC NTS 144A 6.000% 11/01/33 | F | 01/15/2009 | Maturity | | 2,592,000 | 2,592,000 | 2,623,104 | 2,592,814 | | (814) | | (814) | | 2,592,000 | | | 82,426 | 01/15/2009 | |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|---|--|---------|---------------|--|---------------------------|---------------|-------------|-------------|---|--|---|---|---|---|---|--|----------------------------------|-------------------------------|--|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/Adjusted Carrying Value | Unrealized Valuation Increase/Decrease | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Book/Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/Stock Dividends Received During Year | Maturity Date |
| 915436-AE-9 | UPM-Kymmene Corp Series 144A 5.625% 12/01/14 | F | 06/15/2009 | Symetra BOLI U-Life RBC Dain Rauscher, Inc. | | 1,174,406 | 1,150,000 | 1,187,640 | 1,176,139 | | (1,734) | | (1,734) | | 1,174,406 | | | | 34,859 | 12/01/2014 |
| 92857W-AP-5 | VODAFONE GROUP PLC 5.625% 02/27/17 | F | 04/13/2009 | | | 888,473 | 900,000 | 760,860 | 761,914 | | 3,576 | | 3,576 | | 765,490 | | 122,990 | 122,990 | 32,203 | 02/27/2017 |
| 3899999. Bonds - Industrial and Miscellaneous (Unaffiliated) | | | | | | 369,997,820 | 385,610,181 | 380,078,672 | 383,476,123 | | 584,871 | 1,573,229 | (988,358) | | 382,487,761 | | (12,489,937) | (12,489,937) | 16,646,480 | XXX |
| 02637X-AA-2 | AMERICAN GENL INSTIT CAP NTS 144A SER B 8.125% 03/15/46 | | 06/15/2009 | Symetra BOLI U-Life | | 1,118,637 | 1,000,000 | 1,119,400 | 1,118,936 | 718,846 | (299) | | 718,547 | | 1,118,637 | | | | 60,938 | |
| 302570-AW-6 | FPL GROUP CAPITAL 6.350% 10/01/66 | | 06/15/2009 | Symetra BOLI U-Life | | 506,975 | 500,000 | 508,455 | 507,315 | | (340) | | (340) | | 506,975 | | | | 22,401 | |
| 4899999. Bonds - Hybrid Securities | | | | | | 1,625,612 | 1,500,000 | 1,627,855 | 1,626,251 | 718,846 | (639) | | 718,207 | | 1,625,612 | | | | 83,339 | XXX |
| 8399997. Total - Bonds - Part 4 | | | | | | 707,904,383 | 714,866,679 | 706,222,535 | 709,604,628 | 718,846 | 1,074,032 | 1,573,229 | 219,649 | | 709,105,422 | | (1,201,037) | (1,201,037) | 28,518,288 | XXX |
| 8399998. Total - Bonds - Part 5 | | | | | | 42,757,000 | 43,065,682 | 42,858,851 | | | (979,681) | | (979,681) | | 41,879,171 | | 877,828 | 877,828 | 806,949 | XXX |
| 8399999. Total - Bonds | | | | | | 750,661,383 | 757,932,361 | 749,081,386 | 709,604,628 | 718,846 | 94,351 | 1,573,229 | (760,032) | | 750,984,593 | | (323,209) | (323,209) | 29,325,237 | XXX |
| 8999997. Total - Preferred Stocks - Part 4 | | | | | | | | XXX | | | | | | | | | | | | XXX |
| 8999998. Total - Preferred Stocks - Part 5 | | | | | | | | XXX | | | | | | | | | | | | XXX |
| 8999999. Total - Preferred Stocks | | | | | | | | XXX | | | | | | | | | | | | XXX |
| 008892-10-1 | AIM VI Capital Appreciation I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 95,391,000 | 1,671,557 | | 2,470,814 | 1,611,149 | 859,666 | | | 859,666 | | 2,470,814 | | (799,257) | (799,257) | 465 | |
| 008892-41-6 | AIM VI Global Health Car Ser I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 19,738,000 | 255,550 | | 387,404 | 246,129 | 141,275 | | | 141,275 | | 387,404 | | (131,854) | (131,854) | 54 | |
| 008892-50-7 | AIM VI International Growth I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 86,880,000 | 1,873,699 | | 2,434,233 | 1,693,292 | 740,941 | | | 740,941 | | 2,434,233 | | (560,534) | (560,534) | 1,510 | |
| 008892-52-3 | AIM VI Glob Real Estate Ser I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 450,379,000 | 4,201,042 | | 10,325,676 | 4,156,997 | 6,168,679 | | | 6,168,679 | | 10,325,676 | | (6,124,634) | (6,124,634) | | |
| 008892-53-1 | AIM VI Sm Cap Equity Fd Ser II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 1,348,000 | 13,082 | | 18,926 | 14,167 | 4,758 | | | 4,758 | | 18,926 | | (5,844) | (5,844) | | |
| 008892-54-9 | AIM VI Small Cap Equity Fund I | | 02/11/2009 | AIM Variable Insurance Funds, Inc. | 3,434,000 | 32,758 | | 37,663 | 36,472 | 1,191 | | | 1,191 | | 37,663 | | (4,905) | (4,905) | | |
| 008892-65-5 | AIM VI International Growth II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 187,464,000 | 4,002,062 | | 5,989,913 | 3,604,930 | 2,384,984 | | | 2,384,984 | | 5,989,913 | | (1,987,851) | (1,987,851) | 3,340 | |
| 008892-74-7 | AIM VI Cap Development Ser II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 25,464,000 | 216,949 | | 469,793 | 197,090 | 272,702 | | | 272,702 | | 469,793 | | (252,843) | (252,843) | | |
| 008892-75-4 | AIM VI Capital Appreciation II | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 42,366,000 | 732,125 | | 1,108,809 | 703,694 | 405,115 | | | 405,115 | | 1,108,809 | | (376,684) | (376,684) | 117 | |
| 008892-85-3 | AIM VI Cap Development Ser I | | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 16,057,000 | 141,148 | | 278,834 | 127,329 | 151,505 | | | 151,505 | | 278,834 | | (137,686) | (137,686) | | |
| 024936-10-6 | American Century Value | | 12/31/2009 | American Century Variable Portfolios, Inc. | 357,062,000 | 1,617,107 | | 2,793,604 | 1,671,050 | 1,122,555 | | | 1,122,555 | | 2,793,604 | | (1,176,497) | (1,176,497) | 62,544 | |
| 024936-20-5 | American Century International | | 12/31/2009 | American Century Variable Portfolios, Inc. | 617,806,000 | 3,836,953 | | 5,154,486 | 3,669,770 | 1,484,716 | | | 1,484,716 | | 5,154,486 | | (1,317,533) | (1,317,533) | 60,531 | |
| 024936-40-3 | American Century Balanced | | 12/31/2009 | American Century Variable Portfolios, Inc. | 1,219,369,000 | 6,381,863 | | 8,617,300 | 6,438,269 | 2,179,031 | | | 2,179,031 | | 8,617,300 | | (2,235,437) | (2,235,437) | 198,054 | |
| 024936-75-9 | American Century Large Co Val | | 12/31/2009 | American Century Variable Portfolios, Inc. | 78,893,000 | 581,072 | | 868,557 | 603,531 | 265,026 | | | 265,026 | | 868,557 | | (287,486) | (287,486) | 20,128 | |
| 024936-85-8 | American Century VP Ultra II | | 12/31/2009 | American Century Variable Portfolios, Inc. | 12,121,000 | 80,074 | | 100,806 | 72,607 | 28,199 | | | 28,199 | | 100,806 | | (20,732) | (20,732) | 123 | |
| 024936-88-2 | American Century VP Ultra CI I | | 12/31/2009 | American Century Variable Portfolios, Inc. | 20,680,000 | 139,315 | | 206,528 | 125,323 | 81,205 | | | 81,205 | | 206,528 | | (67,213) | (67,213) | 312 | |
| 02507T-20-9 | American Century Inflat Protec | | 12/31/2009 | American Century Variable Portfolios, Inc. | 268,245,000 | 2,758,307 | | 2,772,154 | 2,655,630 | 116,524 | | | 116,524 | | 2,772,154 | | (13,847) | (13,847) | 12,119 | |

E14.10

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---------------------------------|---------|---------------|--|---------------------------|---------------|-----------|-------------|---|--|---|---|---|---|---|--|----------------------------------|-------------------------------|--|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/Adjusted Carrying Value | Unrealized Valuation Increase/Decrease | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Book/Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/Stock Dividends Received During Year | Maturity Date |
| 02507T-30-8 | Amer Cent VP Inflation Protect | | 12/24/2009 | American Century Variable Portfolios, Inc. | 66,000 | 706 | | 701 | 659 | 43 | | | 43 | | 701 | | 5 | 5 | | 7 |
| 23338G-40-6 | DWS Captial Growth VIP B | | 12/31/2009 | DWS Variable Series I and II | 12,891,000 | 194,670 | | 247,025 | 173,899 | 73,126 | | | 73,126 | | 247,025 | | (52,355) | (52,355) | | 1,608 |
| 23338G-60-4 | DWS Global Opportunities B | | 03/23/2009 | DWS Variable Series I and II | 4,000 | 30 | | 30 | 33 | (3) | | | (3) | | 30 | | | | | |
| 23338G-85-1 | DWS International VIP B | | 12/31/2009 | DWS Variable Series I and II | 551,000 | 4,037 | | 6,335 | 3,595 | 2,739 | | | 2,739 | | 6,335 | | (2,298) | (2,298) | | 117 |
| 23338G-86-9 | DWS International VIP A | | 12/31/2009 | DWS Variable Series I and II | 278,663,000 | 1,917,823 | | 3,391,554 | 1,816,881 | 1,574,673 | | | 1,574,673 | | 3,391,554 | | (1,473,731) | (1,473,731) | | 55,993 |
| 23338H-68-5 | DWS Balanced VIP A | | 12/31/2009 | DWS Variable Series I and II | 256,014,000 | 4,622,451 | | 6,138,589 | 4,444,410 | 1,694,179 | | | 1,694,179 | | 6,138,589 | | (1,516,138) | (1,516,138) | | 125,802 |
| 23338H-79-2 | DWS VIP Money Market CI A | | 12/31/2009 | DWS Variable Series I and II | 141,849,000 | 141,849 | | 141,849 | 141,849 | | | | | | 141,849 | | | | | 377 |
| 23338H-80-0 | DWS Global Thematic B | | 12/31/2009 | DWS Variable Series I and II | 33,000 | 248 | | 179 | 193 | (14) | | | (14) | | 179 | | 69 | 69 | | 3 |
| 23339F-40-7 | DWS Small Cap Index A | | 12/31/2009 | DWS Variable Series I and II | 101,000 | 910 | | 1,221 | 875 | 347 | | | 347 | | 1,221 | | (312) | (312) | | 70 |
| 261976-60-9 | Dreyfus Quality Bond | | 12/31/2009 | DWS Variable Series I and II | 443,411,000 | 4,584,351 | | 4,999,309 | 4,482,880 | 516,429 | | | 516,429 | | 4,999,309 | | (414,959) | (414,959) | | 92,376 |
| 261976-80-7 | Dreyfus Appreciation | | 12/31/2009 | Dreyfus Variable Insurance Fund | 64,627,000 | 1,759,779 | | 2,239,074 | 1,866,423 | 372,651 | | | 372,651 | | 2,239,074 | | (479,295) | (479,295) | | 147,634 |
| 262014-20-2 | Dreyfus Stock Index | | 12/31/2009 | Dreyfus Variable Insurance Fund | 417,576,000 | 9,422,124 | | 13,793,004 | 9,604,239 | 4,188,765 | | | 4,188,765 | | 13,793,004 | | (4,370,880) | (4,370,880) | | 457,345 |
| 26201X-10-9 | Dreyfus Socially Responsible | | 12/31/2009 | Dreyfus Variable Insurance Fund | 75,242,000 | 1,663,584 | | 2,164,939 | 1,494,311 | 670,627 | | | 670,627 | | 2,164,939 | | (501,354) | (501,354) | | 11,748 |
| 26202A-20-7 | Dreyfus Midcap Stock | | 12/31/2009 | Dreyfus Variable Insurance Fund | 657,188,000 | 5,531,943 | | 11,094,596 | 5,158,926 | 5,935,670 | | | 5,935,670 | | 11,094,596 | | (5,562,653) | (5,562,653) | | 56,339 |
| 26202A-80-1 | Dreyfus Technology Growth | | 12/31/2009 | Dreyfus Variable Insurance Fund | 200,409,000 | 1,573,168 | | 1,967,019 | 1,276,604 | 690,415 | | | 690,415 | | 1,967,019 | | (393,851) | (393,851) | | 5,180 |
| 313916-10-8 | Federated Capital Income | | 12/31/2009 | Federated Insurance Series | 122,334,000 | 940,905 | | 1,270,158 | 886,919 | 383,238 | | | 383,238 | | 1,270,158 | | (329,252) | (329,252) | | 41,738 |
| 313916-30-6 | Federated High Income Bond | | 12/31/2009 | Federated Insurance Series | 357,787,000 | 2,039,027 | | 2,752,976 | 1,799,667 | 953,309 | | | 953,309 | | 2,752,976 | | (713,949) | (713,949) | | 184,563 |
| 313916-60-3 | Federated International Equity | | 12/31/2009 | Federated Insurance Series | 41,650,000 | 487,597 | | 659,502 | 420,663 | 238,838 | | | 238,838 | | 659,502 | | (171,904) | (171,904) | | 10,976 |
| 315802-20-7 | Fidelity Growth Opportunities | | 12/31/2009 | Fidelity Variable Insurance Products | 225,908,000 | 2,655,011 | | 3,496,083 | 2,256,826 | 1,239,257 | | | 1,239,257 | | 3,496,083 | | (841,072) | (841,072) | | 466 |
| 315802-50-4 | Fidelity Balanced | | 12/31/2009 | Fidelity Variable Insurance Products | 1,612,000 | 18,739 | | 22,764 | 15,912 | 6,852 | | | 6,852 | | 22,764 | | (4,024) | (4,024) | | 34 |
| 315802-70-2 | Fidelity Growth & Income | | 12/31/2009 | Fidelity Variable Insurance Products | 291,285,000 | 2,690,279 | | 4,118,899 | 2,560,400 | 1,558,499 | | | 1,558,499 | | 4,118,899 | | (1,428,620) | (1,428,620) | | 1,864 |
| 317613-30-5 | Ibbotson Conserv ETF Ast All 1 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 744,000 | 7,485 | | 7,712 | 7,265 | 447 | | | 447 | | 7,712 | | (227) | (227) | | |
| 317613-40-4 | Ibbotson Inc & Gr ETF Ast All 1 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 2,692,000 | 23,805 | | 27,195 | 22,638 | 4,557 | | | 4,557 | | 27,195 | | (3,390) | (3,390) | | |
| 317613-50-3 | Ibbotson Balance ETF Ast All 1 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 60,697,000 | 477,023 | | 591,332 | 464,335 | 126,998 | | | 126,998 | | 591,332 | | (114,310) | (114,310) | | |
| 317613-60-2 | Ibbotson Growth ETF Ast All 1 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 74,602,000 | 494,418 | | 637,044 | 516,992 | 120,052 | | | 120,052 | | 637,044 | | (142,627) | (142,627) | | |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|--------------------------------|---------|---------------|--|---------------------------|---------------|-----------|-------------|---|--|---|---|---|---|---|--|----------------------------------|-------------------------------|--|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/Adjusted Carrying Value | Unrealized Valuation Increase/Decrease | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Book/Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/Stock Dividends Received During Year | Maturity Date |
| 317613-70-1 | Ibbotson Aggress Grow ETF AA 1 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 14,471,000 | 100,672 | | 129,285 | 92,037 | 37,249 | | | 37,249 | | 129,285 | | (28,613) | (28,613) | | |
| 317613-80-0 | Ibbotson Aggress Grow ETF AA 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 8,464,000 | 60,335 | | 79,227 | 54,003 | 25,224 | | | 25,224 | | 79,227 | | (18,892) | (18,892) | | |
| 317613-85-9 | Ibbotson Conservative ETF AA 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 1,315,000 | 13,372 | | 12,575 | 12,890 | (315) | | | (315) | | 12,575 | | 797 | 797 | | |
| 317613-86-7 | Ibbotson Growth ETF Ast All 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 16,060,000 | 125,895 | | 138,882 | 110,654 | 28,228 | | | 28,228 | | 138,882 | | (12,987) | (12,987) | | |
| 317613-87-5 | Ibbotson Balance ETF Ast All 2 | | 12/31/2009 | Financial Investors Variable Insurance Trust | 24,001,000 | 202,826 | | 205,762 | 185,527 | 20,235 | | | 20,235 | | 205,762 | | (2,936) | (2,936) | | |
| 317613-88-3 | Ibbotson Inc & Growth ETF AA 2 | | 11/04/2009 | Franklin Templeton Variable Insurance Products Trust | 11,398,000 | 100,332 | | 96,266 | 99,509 | (3,242) | | | (3,242) | | 96,266 | | 4,066 | 4,066 | | |
| 355150-22-8 | FTVIP Founding Funds Alloc 2 | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 6,805,000 | 41,100 | | 56,958 | 38,174 | 18,783 | | | 18,783 | | 56,958 | | (15,857) | (15,857) | | 11 |
| 355150-23-6 | FTVIP Founding Funds Alloc 1 | | 12/22/2009 | Franklin Templeton Variable Insurance Products Trust | 1,261,000 | 8,891 | | 10,387 | 7,085 | 3,303 | | | 3,303 | | 10,387 | | (1,496) | (1,496) | | 208 |
| 355150-26-9 | Franklin Flex Cap Growth Sec | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 17,648,000 | 159,417 | | 209,758 | 145,062 | 64,696 | | | 64,696 | | 209,758 | | (50,341) | (50,341) | | |
| 355150-41-8 | Franklin Income Sec Fund Cl II | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 181,778,000 | 2,233,563 | | 3,134,903 | 2,061,363 | 1,073,541 | | | 1,073,541 | | 3,134,903 | | (901,340) | (901,340) | | 118,754 |
| 355150-42-6 | Franklin U.S. Government | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 924,054,000 | 11,982,301 | | 11,456,708 | 12,003,466 | (546,758) | | | (546,758) | | 11,456,708 | | 525,593 | 525,593 | | 198,208 |
| 355150-48-3 | Templeton Developing Mkts | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 286,289,000 | 2,121,565 | | 3,857,217 | 1,729,185 | 2,128,032 | | | 2,128,032 | | 3,857,217 | | (1,735,652) | (1,735,652) | | 92,681 |
| 355150-49-1 | Templeton Growth | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 142,134,000 | 1,232,349 | | 1,900,125 | 1,165,504 | 734,621 | | | 734,621 | | 1,900,125 | | (667,776) | (667,776) | | 22,830 |
| 355150-52-5 | Franklin Small Cap | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 160,670,000 | 2,216,589 | | 3,338,984 | 1,887,875 | 1,451,109 | | | 1,451,109 | | 3,338,984 | | (1,122,395) | (1,122,395) | | |
| 355150-55-8 | Mutual Shares Security | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 177,140,000 | 2,203,723 | | 3,343,783 | 2,086,708 | 1,257,075 | | | 1,257,075 | | 3,343,783 | | (1,140,061) | (1,140,061) | | 14,514 |
| 355150-56-6 | Templeton Global Bond Fd Cl 2 | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 114,216,000 | 1,938,349 | | 1,921,172 | 1,953,086 | (31,914) | | | (31,914) | | 1,921,172 | | 17,177 | 17,177 | | 147,751 |
| 355150-59-0 | Franklin Small Cap Value Sec | | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 261,991,000 | 2,858,757 | | 4,679,973 | 2,764,008 | 1,915,965 | | | 1,915,965 | | 4,679,973 | | (1,821,217) | (1,821,217) | | 116,447 |
| 355150-67-3 | Franklin Small Cap Value Cl 1 | | 12/24/2009 | Franklin Templeton Variable Insurance Products Trust | 17,000 | 192 | | 290 | 180 | 110 | | | 110 | | 290 | | (98) | (98) | | 8 |
| 355150-70-7 | Templeton Global Bond Fd Cl 1 | | 12/22/2009 | Franklin Templeton Variable Insurance Products Trust | 1,434,000 | 24,900 | | 23,654 | 24,973 | (1,319) | | | (1,319) | | 23,654 | | 1,246 | 1,246 | | 780 |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|---------------------------------|---------|---------------|--|---------------------------|---------------|-----------|-------------|---|--|---|---|---|---|---|--|----------------------------------|-------------------------------|--|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/Adjusted Carrying Value | Unrealized Valuation Increase/Decrease | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Book/Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/Stock Dividends Received During Year | Maturity Date |
| 355150-76-4 | Templeton Growth Securiti CI 1 | | 12/24/2009 | Franklin Templeton Variable Insurance Products Trust | 77.000 | 688 | | 1,226 | 646 | 580 | | | 580 | | 1,226 | | (538) | (538) | | 14 |
| 355150-77-2 | Templeton Develop Mkts Sec CI 1 | | 12/21/2009 | Franklin Templeton Variable Insurance Products Trust | 215.000 | 1,628 | | 3,155 | 1,314 | 1,841 | | | 1,841 | | 3,155 | | (1,527) | (1,527) | | 78 |
| 355150-83-0 | Franklin Zero Coupon 2010 CI 1 | | 02/11/2009 | Franklin Templeton Variable Insurance Products Trust | 1,148.000 | 19,027 | | 18,753 | 19,143 | (390) | | | (390) | | 18,753 | | 275 | 275 | | |
| 355150-87-1 | Franklin US Government CI 1 | | 12/17/2009 | Franklin Templeton Variable Insurance Products Trust | 12.000 | 160 | | 154 | 160 | (6) | | | (6) | | 154 | | 6 | 6 | | 4 |
| 355150-88-9 | Franklin Inc Securities CI 1 | | 12/24/2009 | Franklin Templeton Variable Insurance Products Trust | 23.000 | 291 | | 409 | 268 | 141 | | | 141 | | 409 | | (119) | (119) | | 15 |
| 449797-64-6 | ING Global Resources Port CI S | | 12/31/2009 | ING Investors Trust | 69,508.000 | 993,938 | | 1,426,755 | 905,686 | 521,067 | | | 521,067 | | 1,513,100 | | (432,815) | (432,815) | | 1,181 |
| 449797-78-6 | ING JP Morgan Emerg Mkt Eqty 2 | | 12/31/2009 | ING Investors Trust | 58,295.000 | 857,911 | | 674,669 | 701,877 | (27,209) | | | (27,209) | | 674,669 | | 183,242 | 183,242 | | 4,356 |
| 480906-80-9 | JP Morgan Ins Trst Govt Bond 1 | | 02/11/2009 | JP Morgan Series Trust | 1,700.000 | 20,197 | | 18,753 | 20,249 | (1,496) | | | (1,496) | | 18,753 | | 1,444 | 1,444 | | |
| 616919-30-4 | JP Morgan US Lrg Cap Core Eqty | | 04/24/2009 | JP Morgan Series Trust | 362,755.000 | 4,833,703 | | 4,997,152 | 3,736,378 | 1,260,775 | | | 1,260,775 | | 4,997,152 | | (163,449) | (163,449) | | 85,752 |
| 616919-50-2 | JP Morgan International Equity | | 04/24/2009 | JP Morgan Series Trust | 2,067,882.000 | 23,061,953 | | 27,277,720 | 16,398,308 | 10,879,411 | | | 10,879,411 | | 27,277,720 | | (4,215,767) | (4,215,767) | | 1,279,825 |
| 616919-60-1 | JP Morgan Mid-Cap Value | | 04/24/2009 | JP Morgan Series Trust | 355,257.000 | 9,535,835 | | 10,372,801 | 6,721,466 | 3,651,335 | | | 3,651,335 | | 10,372,801 | | (836,966) | (836,966) | | 158,125 |
| 641222-85-6 | NeuberBerm AMT Mid Cap Grow S | | 12/31/2009 | Neuberger Berman Advisers Management Trust | 2,789.000 | 49,594 | | 68,285 | 44,315 | 23,970 | | | 23,970 | | 68,285 | | (18,691) | (18,691) | | |
| 641222-87-2 | NeuberBerm AMT Guardian Port S | | 12/31/2009 | Neuberger Berman Advisers Management Trust | 903.000 | 11,506 | | 17,145 | 11,181 | 5,964 | | | 5,964 | | 17,145 | | (5,639) | (5,639) | | 3 |
| 693394-40-5 | PIMCO Total Return Port Admin | | 12/21/2009 | PIMCO Variable Insurance Trust | 4,071.000 | 42,574 | | 41,722 | 41,976 | (254) | | | (254) | | 41,722 | | 852 | 852 | | 356 |
| 693394-59-5 | PIMCO Com Real Ret Strat Admin | | 12/31/2009 | PIMCO Variable Insurance Trust | 280,876.000 | 2,186,407 | | 3,943,372 | 1,966,131 | 1,977,240 | | | 1,977,240 | | 3,943,372 | | (1,756,965) | (1,756,965) | | 33,594 |
| 693394-63-7 | PIMCO All Assets Port Advisor | | 12/31/2009 | PIMCO Variable Insurance Trust | 41,024.000 | 417,776 | | 486,264 | 378,652 | 107,612 | | | 107,612 | | 486,264 | | (68,488) | (68,488) | | 4,895 |
| 693394-65-2 | PIMCO All Asset Portfolio Adm | | 12/07/2009 | PIMCO Variable Insurance Trust | 80.000 | 811 | | 908 | 734 | 174 | | | 174 | | 908 | | (98) | (98) | | 12 |
| 724027-18-0 | Pioneer Bond VCT CI I | | 12/31/2009 | Pioneer Variable C Contracts Trust | 504,351.000 | 5,427,339 | | 5,641,732 | 5,164,556 | 477,176 | | | 477,176 | | 5,641,732 | | (214,393) | (214,393) | | 141,332 |
| 724027-20-6 | Pioneer Mid Cap Value VCT CI I | | 12/31/2009 | Pioneer Variable C Contracts Trust | 361,605.000 | 4,461,189 | | 7,963,318 | 4,238,013 | 3,725,304 | | | 3,725,304 | | 7,963,318 | | (3,502,129) | (3,502,129) | | 31,338 |
| 724027-23-0 | Pioneer Growth Opp VCT CI I | | 12/31/2009 | Pioneer Variable C Contracts Trust | 982,419.000 | 15,148,311 | | 20,363,875 | 13,007,229 | 7,356,645 | | | 7,356,645 | | 20,363,875 | | (5,215,564) | (5,215,564) | | |
| 724027-30-5 | Pioneer Real Estate VCT CI 1 | | 12/28/2009 | Pioneer Variable C Contracts Trust | 2,035.000 | 17,193 | | 26,331 | 21,183 | 5,148 | | | 5,148 | | 26,331 | | (9,138) | (9,138) | | 18 |
| 724027-33-9 | Pioneer Small Cap Value CI II | | 04/23/2009 | Pioneer Variable C Contracts Trust | 556,180.000 | 3,515,893 | | 7,056,710 | 3,759,780 | 3,296,929 | | | 3,296,929 | | 7,056,710 | | (3,540,817) | (3,540,817) | | 19,517 |
| 724027-35-4 | Pioneer Sm Cap Val II VCT CI I | | 04/23/2009 | Pioneer Variable C Contracts Trust | 1,468,577.000 | 9,369,485 | | 21,759,502 | 10,045,066 | 11,714,436 | | | 11,714,436 | | 21,759,502 | | (12,390,017) | (12,390,017) | | 90,525 |
| 724027-40-4 | Pioneer Equity Income VCT CI 1 | | 02/11/2009 | Pioneer Variable C Contracts Trust | 4,891.000 | 68,587 | | 75,540 | 74,243 | 1,298 | | | 1,298 | | 75,540 | | (6,953) | (6,953) | | |
| 724027-61-0 | Pioneer High Yield VCT CI 1 | | 12/29/2009 | Pioneer Variable C Contracts Trust | 5,647.000 | 43,590 | | 58,583 | 36,477 | 22,106 | | | 22,106 | | 58,583 | | (14,994) | (14,994) | | 2,166 |
| 724027-62-8 | Pioneer High Yield VCT CI II | | 12/31/2009 | Pioneer Variable C Contracts Trust | 284,051.000 | 2,045,638 | | 2,358,855 | 1,832,131 | 526,724 | | | 526,724 | | 2,358,855 | | (313,218) | (313,218) | | 66,445 |
| 724027-64-4 | Pioneer Strtegic Inc VCT CI II | | 12/31/2009 | Pioneer Variable C Contracts Trust | 149,489.000 | 1,398,657 | | 1,603,202 | 1,333,441 | 269,760 | | | 269,760 | | 1,603,202 | | (204,544) | (204,544) | | 76,903 |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 |
|----------------------|--------------------------------|---------|---------------|----------------------------------|---------------------------|---------------|-----------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date |
| 724027-70-1 | Pioneer Money Market VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 4,890,454.000 | 4,890,454 | | 4,890,454 | 4,890,454 | | | | | | 4,890,454 | | | | | 6.891 |
| 724027-75-0 | Pioneer Emerg Mkts VCT Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 124,490.000 | 2,632,952 | | 4,939,027 | 1,944,540 | 2,994,487 | | | 2,994,487 | | 4,939,027 | | (2,306,074) | (2,306,074) | | 13.376 |
| 724027-81-8 | Pioneer Real Est VCT Prt Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 87,660.000 | 882,325 | | 2,088,611 | 909,907 | 1,178,705 | | | 1,178,705 | | 2,088,611 | | (1,206,286) | (1,206,286) | | 18.632 |
| 724027-82-6 | Pioneer Eqty Income VCT Cl II | | 12/31/2009 | Pioneer Variable Contracts Trust | 136,545.000 | 2,027,092 | | 3,447,350 | 2,083,674 | 1,363,677 | | | 1,363,677 | | 3,447,350 | | (1,420,258) | (1,420,258) | | 25.398 |
| 724027-86-7 | Pioneer Emerging Mkt VCT Cl 1 | | 12/21/2009 | Pioneer Variable Contracts Trust | 1,175.000 | 16,938 | | 40,739 | 18,619 | 22,120 | | | 22,120 | | 40,739 | | (23,802) | (23,802) | | 4 |
| 724027-87-5 | Pioneer Fund VCT Cl I | | 12/31/2009 | Pioneer Variable Contracts Trust | 1,081,200.000 | 17,799,364 | | 23,726,621 | 17,234,326 | 6,492,295 | | | 6,492,295 | | 23,726,621 | | (5,927,257) | (5,927,257) | | 123.959 |
| 866167-40-6 | Summit Balanced Index | | 04/08/2009 | Summit Mutual Funds, Inc. | 62.000 | 2,305 | | 2,755 | 2,411 | 344 | | | 344 | | 2,755 | | (450) | (450) | | |
| 866167-50-5 | Summit Lehman Aggreg Bond Indx | | 12/31/2009 | Summit Mutual Funds, Inc. | 2,399.000 | 125,095 | | 119,178 | 122,761 | (3,583) | | | (3,583) | | 119,178 | | 5,917 | 5,917 | | 5 |
| 866167-54-7 | Summit EAFE Internatl Index F | | 04/30/2009 | Summit Mutual Funds, Inc. | 2.000 | 115 | | 156 | 137 | 19 | | | 19 | | 156 | | (41) | (41) | | |
| 866167-55-4 | Summit S&P MidCap 400 Cl F | | 07/31/2009 | Summit Mutual Funds, Inc. | 309.000 | 13,467 | | 17,512 | 12,566 | 4,946 | | | 4,946 | | 17,512 | | (4,045) | (4,045) | | |
| 866167-68-7 | Summit Russell 2000 SmCap Id F | | 12/31/2009 | Summit Mutual Funds, Inc. | 2,639.000 | 118,575 | | 155,083 | 106,943 | 48,140 | | | 48,140 | | 155,083 | | (36,509) | (36,509) | | 1 |
| 866167-69-5 | Summit EAFE International Indx | | 12/18/2009 | Summit Mutual Funds, Inc. | 361.000 | 18,152 | | 34,490 | 20,391 | 14,099 | | | 14,099 | | 34,490 | | (16,338) | (16,338) | | |
| 866167-79-4 | Summit Russell 2000 Sm Cap Idx | | 12/07/2009 | Summit Mutual Funds, Inc. | 3.000 | 136 | | 176 | 131 | 45 | | | 45 | | 176 | | (40) | (40) | | |
| 866167-81-0 | Summit Nasdaq 100 Ind | | 04/27/2009 | Summit Mutual Funds, Inc. | 506.000 | 9,337 | | 9,746 | 8,416 | 1,330 | | | 1,330 | | 9,746 | | (409) | (409) | | |
| 921925-20-2 | Vanguard VIF Tot Bnd Mkt InvCl | | 12/31/2009 | Vanguard Variable Insurnace Fund | 59,581.000 | 688,280 | | 682,062 | 692,331 | (10,268) | | | (10,268) | | 682,062 | | 6,218 | 6,218 | | 10.045 |
| 921925-30-1 | Vanguard VIF Equity Index Port | | 12/31/2009 | Vanguard Variable Insurnace Fund | 157.000 | 2,818 | | 4,193 | 2,756 | 1,437 | | | 1,437 | | 4,193 | | (1,375) | (1,375) | | 109 |
| 921925-40-0 | Vanguard VIF Balance Port Inv1 | | 12/31/2009 | Vanguard Variable Insurnace Fund | 4,598.000 | 69,537 | | 90,014 | 68,285 | 21,729 | | | 21,729 | | 90,014 | | (20,477) | (20,477) | | 2.583 |
| 921925-70-7 | Vanguard VIF Intern'l Port Inv | | 12/31/2009 | Vanguard Variable Insurnace Fund | 12,641.000 | 166,107 | | 268,706 | 149,158 | 119,547 | | | 119,547 | | 268,706 | | (102,599) | (102,599) | | 3.681 |
| 921925-80-6 | Vanguard VIF High Yield Bond I | | 12/31/2009 | Vanguard Variable Insurnace Fund | 23,970.000 | 158,206 | | 189,732 | 141,663 | 48,069 | | | 48,069 | | 189,732 | | (31,526) | (31,526) | | 7.664 |
| 921925-81-4 | Vanguard VIF Total Stk Mkt Idx | | 12/31/2009 | Vanguard Variable Insurnace Fund | 36,395.000 | 711,084 | | 1,069,712 | 661,306 | 408,406 | | | 408,406 | | 1,069,712 | | (358,628) | (358,628) | | 33.824 |
| 921925-82-2 | Vanguard VIF Capital Grwth Prt | | 02/11/2009 | Vanguard Variable Insurnace Fund | 5,842.000 | 70,094 | | 75,011 | 72,558 | 2,454 | | | 2,454 | | 75,011 | | (4,918) | (4,918) | | |
| 921925-84-8 | Vanguard VIF REIT Index Inv Cl | | 12/31/2009 | Vanguard Variable Insurnace Fund | 18,161.000 | 131,012 | | 265,954 | 138,929 | 127,024 | | | 127,024 | | 265,954 | | (134,942) | (134,942) | | 12.658 |
| 921925-85-5 | Vanguard VIF MidCap Idx Inv Cl | | 12/31/2009 | Vanguard Variable Insurnace Fund | 49,673.000 | 518,785 | | 845,540 | 457,983 | 387,557 | | | 387,557 | | 845,540 | | (326,755) | (326,755) | | 25.162 |
| 921925-88-9 | Vanguard VIF Small Com Growth | | 12/31/2009 | Vanguard Variable Insurnace Fund | 103.000 | 1,142 | | 1,604 | 1,006 | 598 | | | 598 | | 1,604 | | (462) | (462) | | 10 |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 4

Showing All Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Change In Book/Adjusted Carrying Value | | | | | 16 | 17 | 18 | 19 | 20 | 21 | | | | | | |
|---|---------------------------------|---------|---------------|--------------------------------------|---------------------------|---------------|-----------|-------------|--|---|--|---|--|--|--|--|----------------------------------|-------------------------------|---|---------------|-------------|---------------|---------------|---------------|------------|-----|
| | | | | | | | | | | 11 | 12 | 13 | 14 | 15 | | | | | | | | | | | | |
| CUSIP Identification | Description | Foreign | Disposal Date | Name of Purchaser | Number of Shares of Stock | Consideration | Par Value | Actual Cost | Prior Year Book/ Adjusted Carrying Value | Unrealized Valuation Increase/ Decrease | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (11+12-13) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Book/ Adjusted Carrying Value at Disposal Date | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Bond Interest/ Stock Dividends Received During Year | Maturity Date | | | | | | |
| 922174-10-7 | Fidelity Money Market | | 12/31/2009 | Fidelity Variable Insurance Products | 3,375,850.000 | 3,375,850 | | 3,375,850 | 3,375,850 | | | | | | 3,375,850 | | | | | 12,438 | | | | | | |
| 922174-20-6 | Fidelity VIP High Income Initl | | 12/31/2009 | Fidelity Variable Insurance Products | 47,950.000 | 231,628 | | 333,018 | 189,880 | 143,137 | | | 143,137 | | 333,018 | | (101,389) | (101,389) | | 1,279 | | | | | | |
| 922174-30-5 | Fidelity Equity Income | | 12/31/2009 | Fidelity Variable Insurance Products | 480,464.000 | 6,681,090 | | 12,187,885 | 6,332,512 | 5,855,374 | | | 5,855,374 | | 12,187,885 | | (5,506,796) | (5,506,796) | | 10,137 | | | | | | |
| 922174-40-4 | Fidelity Growth | | 12/31/2009 | Fidelity Variable Insurance Products | 276,829.000 | 6,824,249 | | 9,880,348 | 6,513,783 | 3,366,566 | | | 3,366,566 | | 9,880,348 | | (3,056,100) | (3,056,100) | | 2,804 | | | | | | |
| 922174-46-1 | Fidelity VIP Freedom 2030 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 7,475.000 | 50,181 | | 89,992 | 53,147 | 36,845 | | | 36,845 | | 89,992 | | (39,811) | (39,811) | | 26 | | | | | | |
| 922174-49-5 | Fidelity Vip Freedom 2025 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 169.000 | 1,399 | | 2,032 | 1,265 | 767 | | | 767 | | 2,032 | | (633) | (633) | | 16 | | | | | | |
| 922174-50-3 | Fidelity VIP Overseas Initial | | 12/31/2009 | Fidelity Variable Insurance Products | 46,751.000 | 591,759 | | 807,690 | 568,961 | 238,729 | | | 238,729 | | 807,690 | | (215,931) | (215,931) | | 2,098 | | | | | | |
| 922174-53-7 | Fidelity VIP Freedom 2020 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 1,543.000 | 12,050 | | 17,377 | 11,869 | 5,509 | | | 5,509 | | 17,377 | | (5,327) | (5,327) | | 43 | | | | | | |
| 922174-56-0 | Fidelity VIP Freedom 2015 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 497.000 | 3,857 | | 5,493 | 4,054 | 1,439 | | | 1,439 | | 5,493 | | (1,636) | (1,636) | | 30 | | | | | | |
| 922174-59-4 | Fidelity VIP Freedom 2010 Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 132.000 | 1,179 | | 1,504 | 1,081 | 423 | | | 423 | | 1,504 | | (325) | (325) | | 8 | | | | | | |
| 922174-66-9 | Fidelity VIP Freedom Inc Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 507.000 | 4,612 | | 5,275 | 4,622 | 654 | | | 654 | | 5,275 | | (663) | (663) | | 40 | | | | | | |
| 922174-83-4 | Fidelity VIP Money Mkt Serv Cl | | 12/31/2009 | Fidelity Variable Insurance Products | 19,701,892.000 | 19,701,892 | | 19,701,892 | 19,701,892 | | | | | | 19,701,892 | | | | | 64,612 | | | | | | |
| 922174-87-5 | Fidelity VIP Overseas Ser 2 | | 12/31/2009 | Fidelity Variable Insurance Products | 2,069.000 | 25,815 | | 33,201 | 24,966 | 8,235 | | | 8,235 | | 33,201 | | (7,386) | (7,386) | | 23 | | | | | | |
| 922175-10-4 | Fidelity VIP Invest Grade Bd 1 | | 12/31/2009 | Fidelity Variable Insurance Products | 29,018.000 | 347,521 | | 366,664 | 343,577 | 23,087 | | | 23,087 | | 366,664 | | (19,143) | (19,143) | | 15,560 | | | | | | |
| 922175-20-3 | Fidelity Asset Manager | | 12/31/2009 | Fidelity Variable Insurance Products | 112,761.000 | 1,268,052 | | 1,712,922 | 1,162,562 | 550,360 | | | 550,360 | | 1,712,922 | | (444,870) | (444,870) | | 2,746 | | | | | | |
| 922175-30-2 | Fidelity Index 500 | | 12/31/2009 | Fidelity Variable Insurance Products | 20,605.000 | 2,042,322 | | 3,137,721 | 2,043,835 | 1,093,886 | | | 1,093,886 | | 3,137,721 | | (1,095,399) | (1,095,399) | | 42,463 | | | | | | |
| 922175-40-1 | Fidelity Asset Manager: Growth | | 12/31/2009 | Fidelity Variable Insurance Products | 14,846.000 | 157,336 | | 205,549 | 143,712 | 61,837 | | | 61,837 | | 205,549 | | (48,213) | (48,213) | | 327 | | | | | | |
| 922175-50-0 | Fidelity Contrafund | | 12/31/2009 | Fidelity Variable Insurance Products | 557,679.000 | 9,459,614 | | 15,865,903 | 8,582,683 | 7,283,219 | | | 7,283,219 | | 15,865,903 | | (6,406,288) | (6,406,288) | | 10,466 | | | | | | |
| 922176-40-9 | Fidelity VIP Mid Cap Initial | | 12/24/2009 | Fidelity Variable Insurance Products | 2,017.000 | 35,819 | | 56,880 | 37,182 | 19,698 | | | 19,698 | | 56,880 | | (21,060) | (21,060) | | | | | | | | |
| 922176-80-5 | Fidelity Mid-Cap Advisor | | 12/31/2009 | Insurance Products | 126,774.000 | 2,641,635 | | 4,209,273 | 2,297,138 | 1,912,134 | | | 1,912,134 | | 4,209,273 | | (1,567,637) | (1,567,637) | | 2,167 | | | | | | |
| 933702-10-2 | Wanger Small Cap | | 12/31/2009 | Wanger Advisors Trust | 12,300.000 | 278,119 | | 400,835 | 237,399 | 163,436 | | | 163,436 | | 400,835 | | (122,717) | (122,717) | | | | | | | | |
| 9299999. Common Stocks - Mutual Funds | | | | | | | | | | 265,730,985 | XXX | | 370,019,119 | 245,299,936 | 124,719,182 | | | | | 124,719,182 | 370,105,464 | (104,288,136) | (104,288,136) | 4,713,468 | XXX | |
| 9799997. Total - Common Stocks - Part 4 | | | | | | | | | | 265,730,985 | XXX | | 370,019,119 | 245,299,936 | 124,719,182 | | | | | | 124,719,182 | 370,105,464 | (104,288,136) | (104,288,136) | 4,713,468 | XXX |
| 9799998. Total - Common Stocks - Part 5 | | | | | | | | | | 29,373,024 | XXX | | 28,738,018 | | | | | | | | 635,006 | 635,006 | | | 251,901 | XXX |
| 9799999. Total - Common Stocks | | | | | | | | | | 295,104,009 | XXX | | 398,757,137 | 245,299,936 | 124,719,182 | | | | | | 124,719,182 | 398,843,482 | (103,653,130) | (103,653,130) | 4,965,369 | XXX |
| 9899999. Total - Preferred and Common Stocks | | | | | | | | | | 295,104,009 | XXX | | 398,757,137 | 245,299,936 | 124,719,182 | | | | | | 124,719,182 | 398,843,482 | (103,653,130) | (103,653,130) | 4,965,369 | XXX |
| 9999999 - Totals | | | | | | | | | | 1,045,765,392 | XXX | | 1,147,838,523 | 954,904,564 | 125,438,028 | | 94,351 | 1,573,229 | | | 123,959,150 | 1,149,828,075 | (103,976,339) | (103,976,339) | 34,290,606 | XXX |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 5

Showing All Long-Term Bonds and Stocks ACQUIRED During Year and Fully DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | Change in Book/Adjusted Carrying Value | | | | | 17 | 18 | 19 | 20 | 21 |
|---|---|---------|---------------|----------------------------|---------------|-----------------------------|---|-------------|---------------|--|--|---|---|---|---|--|----------------------------------|-------------------------------|---|---|
| | | | | | | | | | | | 12 | 13 | 14 | 15 | 16 | | | | | |
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Disposal Date | Name of Purchaser | Par Value (Bonds) or Number of Shares (Stock) | Actual Cost | Consideration | Book/Adjusted Carrying Value at Disposal | Unrealized Valuation Increase/(Decrease) | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (12 + 13 - 14) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Interest and Dividends Received During Year | Paid for Accrued Interest and Dividends |
| 17309*-9Z-7 | FHA PROJ SECT 236 #92 (CITICORP) | | 11/27/2009 | Symetra BOLI U-Life | 12/01/2009 | Paydown | 11,535 | 11,357 | 11,535 | 11,535 | | .178 | | .178 | | | | | .74 | .64 |
| 36202F-BK-1 | 4542 5.500% 09/20/39 | | 09/30/2009 | Morgan Stanley & Co., Inc. | 12/01/2009 | Paydown | 128,329 | 134,956 | 128,329 | 128,329 | | (6,627) | | (6,627) | | | | | .932 | .392 |
| 3620A2-T5-5 | GNMA 5.000% 05/15/39 | | 06/23/2009 | JP Morgan Securities, Inc. | 12/01/2009 | Paydown | 292,172 | 296,509 | 292,172 | 292,172 | | (4,337) | | (4,337) | | | | | 4,763 | 771 |
| 3620A9-PZ-8 | 723240 5.000% 10/15/39 | | 11/03/2009 | Banc of America Securities | 12/01/2009 | Paydown | 30,796 | 31,946 | 30,796 | 30,796 | | (1,150) | | (1,150) | | | | | .128 | .77 |
| 3620A9-TN-1 | 09/15/39 | | 10/14/2009 | UBS PaineWebber, Inc. | 12/01/2009 | Paydown | 556,403 | 587,266 | 556,403 | 556,403 | | (30,863) | | (30,863) | | | | | 3,862 | 1,700 |
| 3620AA-TX-6 | 724266 5.500% 09/15/39 | | 10/06/2009 | Banc of America Securities | 12/01/2009 | Paydown | 339,588 | 356,126 | 339,588 | 339,588 | | (16,538) | | (16,538) | | | | | 1,945 | 1,068 |
| 3620AD-CD-2 | 726468 5.000% 11/15/39 | | 11/13/2009 | JP Morgan Securities, Inc. | 12/01/2009 | Paydown | 34,314 | 35,965 | 34,314 | 34,314 | | (1,651) | | (1,651) | | | | | .143 | .86 |
| 36295P-VT-3 | 676722 5.500% 02/15/38 | | 09/16/2009 | Morgan Stanley & Co., Inc. | 12/01/2009 | Paydown | 2,979,314 | 3,124,090 | 2,979,314 | 2,979,314 | | (144,776) | | (144,776) | | | | | 26,113 | 9,103 |
| 36296D-LC-0 | 688023 6.000% 10/15/38 | | 01/01/2009 | Morgan Stanley & Co., Inc. | 12/01/2009 | Paydown | 2,350,840 | 2,426,507 | 2,350,840 | 2,350,840 | | (75,668) | | (75,668) | | | | | 69,507 | 7,836 |
| 36296Q-3N-7 | 698405 5.000% 07/15/39 | | 08/18/2009 | Banc of America Securities | 12/01/2009 | Paydown | 334,542 | 342,644 | 334,542 | 334,542 | | (8,102) | | (8,102) | | | | | 3,537 | 929 |
| 36296Q-H9-3 | 697856 5.500% 02/15/39 | | 09/16/2009 | Morgan Stanley & Co., Inc. | 12/01/2009 | Paydown | 2,072,907 | 2,173,637 | 2,072,907 | 2,072,907 | | (100,730) | | (100,730) | | | | | 20,392 | 6,334 |
| 36296X-HC-1 | 704127 5.500% 01/15/39 | | 01/21/2009 | JP MORGAN EQUITIES | 12/01/2009 | Paydown | 1,255,837 | 1,295,867 | 1,255,837 | 1,255,837 | | (40,030) | | (40,030) | | | | | 30,646 | 3,454 |
| 36297A-KW-2 | 706009 5.500% 01/15/39 | | 02/10/2009 | Symetra BOLI U-Life | 12/01/2009 | Paydown | 152,464 | 156,873 | 152,464 | 152,464 | | (4,409) | | (4,409) | | | | | .699 | .606 |
| 36297C-YC-7 | 708207 5.500% 02/15/39 | | 02/06/2009 | Sandler O'Neil | 12/01/2009 | Paydown | 573,208 | 587,896 | 573,208 | 573,208 | | (14,688) | | (14,688) | | | | | 19,315 | 1,576 |
| 619999-AA-3 | FHA 241(F) #052-12012L(MOSSHILL) | | 11/27/2009 | Symetra BOLI U-Life | 12/15/2009 | Paydown | 2,093 | 2,098 | 2,093 | 2,093 | | (6) | | (6) | | | | | .14 | .6 |
| 039999. Bonds - U.S. Governments | | | | | | | 11,114,342 | 11,563,737 | 11,114,342 | 11,114,342 | | (449,397) | | (449,397) | | | | | 182,070 | 34,002 |
| 31368H-NN-9 | Fannie Mae 5.000% 09/01/39 | | 08/27/2009 | Citibank Mortgages | 12/01/2009 | Paydown | 3,803,985 | 3,894,032 | 3,803,985 | 3,803,985 | | (90,047) | | (90,047) | | | | | 34,955 | 6,868 |
| 31393F-NQ-5 | FHLMC REMIC SERIES 2532 CLASS BL | | 01/27/2009 | Sandler O'Neil | 12/01/2009 | Paydown | 2,201,730 | 2,238,884 | 2,201,730 | 2,201,730 | | (37,154) | | (37,154) | | | | | 45,423 | 7,538 |
| 31393M-PD-7 | FHLMC REMIC SER 2582 TD (BPAC) | | 11/27/2009 | Symetra BOLI U-Life | 12/01/2009 | Paydown | 325,415 | 324,923 | 325,415 | 325,415 | | .493 | | .493 | | | | | 1,356 | 1,175 |
| 31393Q-X4-9 | FHLMC REMIC SER 2610 DZ (ACRL) | | 12/01/2009 | Interest Capitalization | 12/17/2009 | Keybank MCD | 95,596 | 95,596 | 101,212 | 92,730 | | (2,866) | | (2,866) | | 8,482 | | .8,482 | 2,693 | |
| 31393Q-Z4-7 | FHLMC REMIC SER 2611 NZ (PAC-Z) | | 10/01/2009 | Interest Capitalization | 10/29/2009 | Robert W. Baird & Co., Inc. | 14,302 | 14,302 | 15,214 | 14,344 | | .42 | | .42 | | .870 | | .870 | .356 | |
| 31393T-VN-3 | FNMA REMIC SER 2003-100 KA (B-VADM) | | 11/27/2009 | Symetra BOLI U-Life | 12/01/2009 | Paydown | 2 | 2 | 2 | 2 | | | | | | | | | | |
| 31393W-SV-2 | FHLMC REMIC SER 2645 NZ (PAC Z) | | 12/01/2009 | Interest Capitalization | 12/07/2009 | Various | 468,169 | 468,169 | 479,660 | 448,939 | | (19,230) | | (19,230) | | 30,721 | | 30,721 | 9,673 | |
| 31393X-ZU-4 | FNMA REMIC SER 2004-17 DZ (Z-PAC) | | 08/01/2009 | Interest Capitalization | 08/24/2009 | Banc of America Securities | 32,882 | 32,882 | 33,868 | 31,550 | | (1,332) | | (1,332) | | 2,318 | | 2,318 | .654 | |
| 31394W-Y9-3 | FHLMC REMIC SER 2785 ZU (PAC Z - RESEC) | | 04/01/2009 | Interest Capitalization | 04/01/2009 | Goldman Sachs & Co. | 125,952 | 125,952 | 127,211 | 113,205 | | (12,747) | | (12,747) | | 14,006 | | 14,006 | .872 | |
| 31395H-MA-5 | FHLMC 2877 MV 4.750% 12/15/28 | | 11/27/2009 | Symetra BOLI U-Life | 12/01/2009 | Paydown | 110,990 | 111,023 | 110,990 | 110,990 | | (33) | | (33) | | | | | .439 | .381 |
| 31412Q-BN-8 | FANNIE MAE 5.000% 07/01/39 | | 07/13/2009 | UBS PaineWebber, Inc. | 12/01/2009 | Paydown | 771,147 | 788,378 | 771,147 | 771,147 | | (17,230) | | (17,230) | | | | | 9,937 | 1,285 |
| 31412Q-HW-2 | FANNIE MAE 5.000% 08/01/39 | | 08/31/2009 | Citibank Mortgages | 12/01/2009 | Paydown | 513,799 | 527,446 | 513,799 | 513,799 | | (13,648) | | (13,648) | | | | | 4,401 | 928 |
| 31412T-SU-3 | FANNIE MAE POOL 934759 5.000% | | 02/01/39 | Barclays Capital, Inc. | 12/01/2009 | Paydown | 5,179,262 | 5,296,604 | 5,179,262 | 5,179,262 | | (117,343) | | (117,343) | | | | | 123,542 | 17,984 |
| 31412U-H5-2 | FANNIE MAE POOL 935052 5.000% | | 03/01/39 | Morgan Stanley & Co., Inc. | 12/01/2009 | Paydown | 2,684,490 | 2,763,347 | 2,684,490 | 2,684,490 | | (78,857) | | (78,857) | | | | | 51,137 | 4,474 |
| 31415Y-XT-1 | FANNIE MAE POOL 993590 5.000% | | 05/22/2009 | Various | 12/01/2009 | Paydown | 1,012,168 | 1,041,110 | 1,012,168 | 1,012,168 | | (28,942) | | (28,942) | | | | | 17,460 | 1,406 |
| 31416H-UN-3 | FANNIE MAE POOL AA0588 5.000% | | 02/01/39 | Greenwich Mortgages, Inc. | 12/01/2009 | Paydown | 136,972 | 141,113 | 136,972 | 136,972 | | (4,141) | | (4,141) | | | | | 3,881 | .398 |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 5

Showing All Long-Term Bonds and Stocks ACQUIRED During Year and Fully DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | Change in Book/Adjusted Carrying Value | | | | | 17 | 18 | 19 | 20 | 21 | |
|---|---|---------|---------------|--|---------------|---|---|-------------|---------------|--|--|---|---|---|---|--|----------------------------------|-------------------------------|---|---|--|
| | | | | | | | | | | | 12 | 13 | 14 | 15 | 16 | | | | | | |
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Disposal Date | Name of Purchaser | Par Value (Bonds) or Number of Shares (Stock) | Actual Cost | Consideration | Book/Adjusted Carrying Value at Disposal | Unrealized Valuation Increase/(Decrease) | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (12 + 13 - 14) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Interest and Dividends Received During Year | Paid for Accrued Interest and Dividends | |
| 31416L-SJ-6 | FANNIE MAE POOL AA3220 5.000% 04/01/39 | | 04/07/2009 | Banc of America Securities | 12/01/2009 | Paydown | 1,364,988 | 1,409,137 | 1,364,988 | 1,364,988 | | (44,149) | | (44,149) | | | | | 32,558 | 2,275 | |
| 31416L-ZX-7 | FANNIE MAE POOL AA3457 5.000% 03/01/39 | | 03/13/2009 | Greenwich Mortgages, Inc. | 12/01/2009 | Paydown | 1,183,991 | 1,211,741 | 1,183,991 | 1,183,991 | | (27,750) | | (27,750) | | | | | 23,836 | 1,973 | |
| 31416M-KD-5 | Fannie Mae 5.000% 03/01/39 | | 08/31/2009 | Citibank Mortgages | 12/01/2009 | Paydown | 2,054,373 | 2,108,942 | 2,054,373 | 2,054,373 | | (54,569) | | (54,569) | | | | | 17,687 | 3,709 | |
| 31416R-GU-1 | FANNIE MAE POOL AA7410 5.000% 05/01/39 | | 05/29/2009 | JP Morgan Securities, Inc. | 12/01/2009 | Paydown | 447,763 | 459,097 | 447,763 | 447,763 | | (11,334) | | (11,334) | | | | | 8,122 | 622 | |
| 31416R-PC-1 | FANNIE MAE POOL AA7618 5.000% 05/01/39 | | 05/06/2009 | KBC Securities | 12/01/2009 | Paydown | 191,605 | 197,503 | 191,605 | 191,605 | | (5,898) | | (5,898) | | | | | 2,880 | 293 | |
| 31417K-SQ-1 | FNMA Pool # AC1426 5.000% 08/01/39 Fannie Mae POOL AC7265 5.000% | | 08/28/2009 | Banc of America Securities | 12/01/2009 | Paydown | 51,582 | 52,847 | 51,582 | 51,582 | | (1,265) | | (1,265) | | | | | 513 | 93 | |
| 31417U-CB-9 | FNMA REMIC SER 2003-60 ZN (PAC-Z) 5.000% 07/16/33 | | 10/28/2009 | Morgan Stanley & Co., Inc. | 12/01/2009 | Paydown | 17,451 | 18,040 | 17,451 | 17,451 | | (589) | | (589) | | | | | 73 | 27 | |
| 38374B-KG-7 | Interest Capitalization | | 08/01/2009 | Citibank Mortgages | 08/24/2009 | | 226,030 | 226,030 | 229,138 | 208,211 | | (17,819) | | (17,819) | | | 20,927 | 20,927 | 4,092 | | |
| 3199999. Bonds - U.S. Special Revenues | | | | | | | 23,014,644 | 23,547,100 | 23,038,016 | 22,960,692 | | (586,408) | | (586,408) | | | 77,324 | 77,324 | 396,540 | 51,429 | |
| 07388V-AE-8 | BEAR STEARNS COMMERCIAL MORTGA SERIES 2007726 CLASS A4 5.471% 01/12/45 | | 01/27/2009 | Cantor Fitzgerald & Company | 08/19/2009 | RBS Greenwich Capital Redemption 100.0000 | 5,000,000 | 3,872,656 | 4,503,516 | 3,927,994 | | 55,338 | | 55,338 | | | 575,521 | 575,521 | 177,048 | 22,036 | |
| 126650-AI-0 | CVS CORP 144A 5.298% 01/11/27 RESIDENTIAL ASSET SECURITIZATI SER 2003-A6 A6 (ACRL-SUB) 5.500% | | 11/27/2009 | Symetra BOLI U-Life | 12/10/2009 | | 13,865 | 13,835 | 13,865 | 13,835 | | | | | | 30 | 30 | 61 | 35 | | |
| 45660N-QI-8 | 07/25/33 ROCHE HLDGS INC 144A 6.000% 03/01/19 | | 09/01/2009 | Interest Capitalization | 09/24/2009 | Guggenheim | 22,831 | 22,831 | 14,840 | 22,660 | | (170) | | (170) | | (7,820) | (7,820) | 513 | | | |
| 771196-AS-1 | Various | | 02/18/2009 | Various | 05/15/2009 | Various | 3,900,000 | 3,838,692 | 4,072,421 | 3,839,648 | | 956 | | 956 | | 232,773 | 232,773 | 50,717 | | | |
| 3899999. Bonds - Industrial and Miscellaneous (Unaffiliated) | | | | | | | 8,936,696 | 7,748,014 | 8,604,642 | 7,804,137 | | 56,124 | | 56,124 | | | 800,504 | 800,504 | 228,339 | 22,071 | |
| 8399998. Total - Bonds | | | | | | | 43,065,682 | 42,858,851 | 42,757,000 | 41,879,171 | | (979,681) | | (979,681) | | | 877,828 | 877,828 | 806,949 | 107,502 | |
| 8999998. Total - Preferred Stocks | | | | | | | | | | | | | | | | | | | | | |
| 008892-10-1 | AIM VI Capital Appreciation I | | 01/26/2009 | AIM Variable Insurance Funds, Inc. | 01/26/2009 | AIM Variable Insurance Funds, Inc. | 8,000 | 124 | 124 | 124 | | | | | | | | | | | |
| 008892-50-7 | AIM VI International Growth I | | 06/29/2009 | AIM Variable Insurance Funds, Inc. | 12/24/2009 | AIM Variable Insurance Funds, Inc. | 25,000 | 546 | 629 | 546 | | | | | | 83 | 83 | | | | |
| 008892-53-1 | AIM VI Sm Cap Equity Fd Ser II | | 03/20/2009 | AIM Variable Insurance Funds, Inc. | 12/31/2009 | AIM Variable Insurance Funds, Inc. | 46,000 | 386 | 531 | 386 | | | | | | 145 | 145 | | | | |
| 024936-85-8 | American Century VP Ultra II | | 08/26/2009 | American Century Variable Portfolios, Inc. | 12/31/2009 | American Century Variable Portfolios, Inc. | 6,775,000 | 48,218 | 48,307 | 48,218 | | | | | | 89 | 89 | | | | |
| 02507T-20-9 | American Century Inflat Protec | | 05/29/2009 | American Century Variable Portfolios, Inc. | 06/02/2009 | American Century Variable Portfolios, Inc. | 0,000 | | | | | | | | | | | | | | |
| 233386-40-6 | DIWS Captial Growth VIP B | | 04/06/2009 | DIWS Variable Series I and II | 12/31/2009 | DIWS Variable Series I and II | 1,619,000 | 21,044 | 21,827 | 21,044 | | | | | | 783 | 783 | 31 | | | |
| 233386-60-4 | DIWS Global Opportunities B | | 10/15/2009 | DIWS Variable Series I and II | 12/31/2009 | DIWS Variable Series I and II | 386,000 | 3,822 | 3,807 | 3,822 | | | | | | (16) | (16) | 2 | | | |
| 23339F-40-7 | DIWS Small Cap Index A | | 09/01/2009 | DIWS Variable Series I and II | 12/31/2009 | DIWS Variable Series I and II | 9,000 | 74 | 83 | 74 | | | | | | 9 | 9 | | | | |
| 261976-87-2 | Dreyfus VIF Int'l Value Inital | | 01/26/2009 | Dreyfus Variable Insurance Fund | 02/11/2009 | Dreyfus Variable Insurance Fund | 2,204,000 | 17,172 | 17,679 | 17,172 | | | | | | 507 | 507 | | | | |
| 26201X-10-9 | Dreyfus Socially Responsible | | 05/15/2009 | Dreyfus Variable Insurance Fund | 12/31/2009 | Dreyfus Variable Insurance Fund | 36,000 | 685 | 730 | 685 | | | | | | 45 | 45 | 6 | | | |
| 26202A-20-7 | Dreyfus Midcap Stock | | 03/27/2009 | Dreyfus Variable Insurance Fund | 06/02/2009 | Dreyfus Variable Insurance Fund | 4,000 | 33 | 38 | 33 | | | | | | 5 | 5 | | | | |
| 26202A-80-1 | Dreyfus Technology Growth | | 03/30/2009 | Dreyfus Variable Insurance Fund | 12/22/2009 | Dreyfus Variable Insurance Fund | 1,591,000 | 10,500 | 14,171 | 10,500 | | | | | | 3,671 | 3,671 | | | | |
| 317613-40-4 | Ibbotson Inc & Gr ETF Ast All1 | | 07/28/2009 | Financial Investors Variable Insurance Trust | 12/16/2009 | Financial Investors Variable Insurance Trust | 7,000,000 | 60,174 | 65,131 | 60,174 | | | | | | 4,957 | 4,957 | | | | |

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ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 5

Showing All Long-Term Bonds and Stocks ACQUIRED During Year and Fully DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | Change in Book/Adjusted Carrying Value | | | | | 17 | 18 | 19 | 20 | 21 |
|----------------------|--------------------------------|---------|---------------|--|---------------|--|---|-------------|---------------|--|--|---|---|---|---|--|----------------------------------|-------------------------------|---|---|
| | | | | | | | | | | | 12 | 13 | 14 | 15 | 16 | | | | | |
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Disposal Date | Name of Purchaser | Par Value (Bonds) or Number of Shares (Stock) | Actual Cost | Consideration | Book/Adjusted Carrying Value at Disposal | Unrealized Valuation Increase/(Decrease) | Current Year's (Amortization)/Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/Adjusted Carrying Value (12 + 13 - 14) | Total Foreign Exchange Change in Book/Adjusted Carrying Value | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Interest and Dividends Received During Year | Paid for Accrued Interest and Dividends |
| 317613-60-2 | Ibbotson Growth ETF Ast All 1 | | 11/04/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 4,612,000 | 32,777 | 37,975 | 32,777 | | | | | | | 5,198 | 5,198 | | |
| 317613-70-1 | Ibbotson Aggress Grow ETF AA 1 | | 10/16/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 25,000 | 191 | 195 | 191 | | | | | | | 5 | 5 | | |
| 317613-80-0 | Ibbotson Aggress Grow ETF AA 2 | | 12/07/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 3,000 | 21 | 21 | 21 | | | | | | | | | | |
| 317613-85-9 | Ibbotson Conservative ETF AA 2 | | 02/02/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 2,790,000 | 26,558 | 27,582 | 26,558 | | | | | | | 1,024 | 1,024 | | |
| 317613-86-7 | Ibbotson Growth ETF Ast All 2 | | 08/26/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 9,911,000 | 61,667 | 79,125 | 61,667 | | | | | | | 17,458 | 17,458 | | |
| 317613-87-5 | Ibbotson Balance ETF Ast All 2 | | 04/21/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 1,352,000 | 9,937 | 10,855 | 9,937 | | | | | | | 918 | 918 | | |
| 317613-88-3 | Ibbotson Inc & Growth ETF AA 2 | | 05/28/2009 | Financial Investors Variable Insurance Trust | 12/31/2009 | Financial Investors Variable Insurance Trust | 3,141,000 | 26,695 | 30,018 | 26,695 | | | | | | | 3,323 | 3,323 | | |
| 355150-26-9 | Franklin Flex Cap Growth Sec | | 07/02/2009 | Franklin Templeton Variable Insurance Products Trust | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 4,244,000 | 34,457 | 43,488 | 34,457 | | | | | | | 9,030 | 9,030 | | |
| 355150-41-8 | Franklin Income Sec Fund Cl II | | 05/18/2009 | Franklin Templeton Variable Insurance Products Trust | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 1,000 | 15 | 3 | 15 | | | | | | | (12) | (12) | | 1 |
| 355150-48-3 | Templeton Developing Mkts | | 11/06/2009 | Franklin Templeton Variable Insurance Products Trust | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 0,000 | 3 | 2 | 3 | | | | | | | (1) | (1) | | |
| 355150-52-5 | Franklin Small Cap | | 07/07/2009 | Franklin Templeton Variable Insurance Products Trust | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 2,000 | 20 | 27 | 20 | | | | | | | 7 | 7 | | |
| 355150-56-6 | Templeton Global Bond Fd Cl 2 | | 06/15/2009 | Franklin Templeton Variable Insurance Products Trust | 12/31/2009 | Franklin Templeton Variable Insurance Products Trust | 15,000 | 231 | 224 | 231 | | | | | | | (7) | (7) | | 4 |
| 355150-70-7 | Templeton Global Bond Fd Cl 1 | | 07/13/2009 | Franklin Templeton Variable Insurance Products Trust | 12/24/2009 | Franklin Templeton Variable Insurance Products Trust | 201,000 | 3,208 | 3,540 | 3,208 | | | | | | | 331 | 331 | | |
| 355150-83-0 | Franklin Zero Coupon 2010 Cl 1 | | 09/04/2009 | Franklin Templeton Variable Insurance Products Trust | 12/01/2009 | Franklin Templeton Variable Insurance Products Trust | 35,000 | 553 | 555 | 553 | | | | | | | 1 | 1 | | |
| 480906-10-6 | JP Morgan Ins Trst US Equity I | | 04/27/2009 | JP Morgan Series Trust | 12/31/2009 | JP Morgan Series Trust | 46,880,000 | 667,993 | 581,069 | 667,993 | | | | | | | (86,924) | (86,924) | | |
| 480906-60-1 | JP Morgan InsTrst MidCapVal I | | 07/10/2009 | JP Morgan Series Trust | 12/31/2009 | JP Morgan Series Trust | 343,719,000 | 2,288,043 | 1,701,187 | 2,288,043 | | | | | | | (586,856) | (586,856) | | |
| 480906-77-5 | JP Morgan Ins Trst Intl Equ I | | 04/27/2009 | JP Morgan Series Trust | 12/31/2009 | JP Morgan Series Trust | 520,558,000 | 6,223,610 | 4,441,276 | 6,223,610 | | | | | | | (1,782,334) | (1,782,334) | | 1,962 |
| 616919-30-4 | JP Morgan US Lrg Cap Core Eqty | | 04/23/2009 | JP Morgan Series Trust | 04/24/2009 | JP Morgan Series Trust | 20,528,000 | 198,553 | 279,283 | 198,553 | | | | | | | 80,730 | 80,730 | | 2,798 |
| 616919-50-2 | JP Morgan International Equity | | 04/23/2009 | JP Morgan Series Trust | 04/24/2009 | JP Morgan Series Trust | 479,008,000 | 3,343,832 | 5,717,723 | 3,343,832 | | | | | | | 2,373,892 | 2,373,892 | | 181,036 |
| 616919-60-1 | JP Morgan Mid-Cap Value | | 04/23/2009 | JP Morgan Series Trust | 04/24/2009 | JP Morgan Series Trust | 34,049,000 | 590,113 | 944,107 | 590,113 | | | | | | | 353,994 | 353,994 | | 10,397 |
| 641222-70-8 | NeuberBerm AMT Regency Port I | | 07/29/2009 | Neuberger Berman Advisers Management Trust | 12/31/2009 | Neuberger Berman Advisers Management Trust | 1,244,000 | 12,911 | 13,946 | 12,911 | | | | | | | 1,036 | 1,036 | | 416 |
| 641222-83-1 | NeuberBerm AMT Regency Port S | | 03/31/2009 | Neuberger Berman Advisers Management Trust | 12/31/2009 | Neuberger Berman Advisers Management Trust | 7,000 | 57 | 84 | 57 | | | | | | | 27 | 27 | | 1 |
| 641222-85-6 | NeuberBerm AMT Mid Cap Grow S | | 04/21/2009 | Neuberger Berman Advisers Management Trust | 12/31/2009 | Neuberger Berman Advisers Management Trust | 519,000 | 8,117 | 8,519 | 8,117 | | | | | | | 402 | 402 | | |
| 693394-63-7 | PIMCO All Assets Port Advisor | | 02/26/2009 | PIMCO Variable Insurance Trust | 12/31/2009 | PIMCO Variable Insurance Trust | 136,000 | 1,200 | 1,422 | 1,200 | | | | | | | 222 | 222 | | 19 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 5

Showing All Long-Term Bonds and Stocks ACQUIRED During Year and Fully DISPOSED OF During Current Year

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | Change in Book/Adjusted Carrying Value | | | | | 17 | 18 | 19 | 20 | 21 |
|----------------------|---------------------------------|---------|---------------|---|---------------|---|---|-------------|---------------|---|---|--|---|--|--|--|----------------------------------|-------------------------------|---|---|
| | | | | | | | | | | | 12 | 13 | 14 | 15 | 16 | | | | | |
| CUSIP Identification | Description | Foreign | Date Acquired | Name of Vendor | Disposal Date | Name of Purchaser | Par Value (Bonds) or Number of Shares (Stock) | Actual Cost | Consideration | Book/ Adjusted Carrying Value at Disposal | Unrealized Valuation Increase/ (Decrease) | Current Year's (Amortization)/ Accretion | Current Year's Other Than Temporary Impairment Recognized | Total Change in Book/ Adjusted Carrying Value (12 + 13 - 14) | Total Foreign Exchange Change in Book/ Adjusted Carrying Value | Foreign Exchange Gain (Loss) on Disposal | Realized Gain (Loss) on Disposal | Total Gain (Loss) on Disposal | Interest and Dividends Received During Year | Paid for Accrued Interest and Dividends |
| 724027-33-9 | Pioneer Small Cap Value CI II | | 04/22/2009 | Pioneer Variable Contracts Trust | 04/23/2009 | Pioneer Variable Contracts Trust | 64,891,000 | 400,610 | 416,580 | 400,610 | | | | | | | 15,970 | 15,970 | 3,392 | |
| 724027-35-4 | Pioneer Sm Cap Val II VCT CI I | | 04/27/2009 | Pioneer Variable Contracts Trust | 04/28/2009 | Pioneer Variable Contracts Trust | 68,807,000 | 429,381 | 445,157 | 429,381 | | | | | | | 15,776 | 15,776 | 5,204 | |
| 724027-40-4 | Pioneer Equity Income VCT CI 1 | | 01/23/2009 | Pioneer Variable Contracts Trust | 02/11/2009 | Pioneer Variable Contracts Trust | 33,000 | 466 | 467 | 466 | | | | | | | 1 | 1 | | |
| 724027-61-0 | Pioneer High Yield VCT CI 1 | | 04/20/2009 | Pioneer Variable Contracts Trust | 12/29/2009 | Pioneer Variable Contracts Trust | 2,722,000 | 18,690 | 26,024 | 18,690 | | | | | | | 7,334 | 7,334 | 1,036 | |
| 724027-62-8 | Pioneer High Yield VCT CI II | | 07/23/2009 | Pioneer Variable Contracts Trust | 12/31/2009 | Pioneer Variable Contracts Trust | 129,489,000 | 1,027,732 | 1,144,818 | 1,027,732 | | | | | | | 117,086 | 117,086 | 15,806 | |
| 724027-82-6 | Pioneer Eqly Income VCT CI II | | 08/07/2009 | Pioneer Variable Contracts Trust | 12/31/2009 | Pioneer Variable Contracts Trust | 42,000 | 602 | 643 | 602 | | | | | | | 41 | 41 | 6 | |
| 866167-40-6 | Summit Balanced Index | | 08/27/2009 | Summit Mutual Funds, Inc. | 12/31/2009 | Summit Mutual Funds, Inc. | 3,644,000 | 151,919 | 157,686 | 151,919 | | | | | | | 5,767 | 5,767 | | |
| 866167-54-7 | Summit EAFE Internatl Index F | | 06/11/2009 | Summit Mutual Funds, Inc. | 12/31/2009 | Summit Mutual Funds, Inc. | 181,000 | 9,693 | 12,626 | 9,693 | | | | | | | 2,933 | 2,933 | | |
| 866167-55-4 | Summit S&P MidCap 400 CI F | | 04/02/2009 | Summit Mutual Funds, Inc. | 12/31/2009 | Summit Mutual Funds, Inc. | 1,941,000 | 73,215 | 109,121 | 73,215 | | | | | | | 35,906 | 35,906 | | |
| 866167-81-0 | Summit Nasdaq 100 Ind | | 04/27/2009 | Summit Mutual Funds, Inc. | 12/31/2009 | Summit Mutual Funds, Inc. | 1,351,000 | 24,470 | 25,615 | 24,470 | | | | | | | 1,145 | 1,145 | | |
| 921925-40-0 | Vanguard VIF Balance Port Inv1 | | 10/06/2009 | Vanguard Variable Insurance Fund Portfolios | 12/31/2009 | Vanguard Variable Insurance Fund Portfolios | 19,000 | 318 | 329 | 318 | | | | | | | 11 | 11 | | |
| 921925-80-6 | Vanguard VIF High Yield Bond I | | 11/23/2009 | Vanguard Variable Insurance Fund Portfolios | 12/10/2009 | Vanguard Variable Insurance Fund Portfolios | 2,823,000 | 17,462 | 17,991 | 17,462 | | | | | | | 529 | 529 | | |
| 921925-81-4 | Vanguard VIF Total Stk Mkt Idx | | 03/26/2009 | Vanguard Variable Insurance Fund Portfolios | 10/20/2009 | Vanguard Variable Insurance Fund Portfolios | 1,228,000 | 19,378 | 26,037 | 19,378 | | | | | | | 6,659 | 6,659 | | |
| 921925-82-2 | Vanguard VIF Capital Grwth Prt | | 09/04/2009 | Vanguard Variable Insurance Fund Portfolios | 12/01/2009 | Vanguard Variable Insurance Fund Portfolios | 41,000 | 553 | 575 | 553 | | | | | | | 22 | 22 | | |
| 921925-84-8 | Vanguard VIF REIT Index Inv CI | | 03/26/2009 | Vanguard Variable Insurance Fund Portfolios | 10/20/2009 | Vanguard Variable Insurance Fund Portfolios | 1,377,000 | 6,252 | 10,504 | 6,252 | | | | | | | 4,252 | 4,252 | | |
| 921925-85-5 | Vanguard VIF MidCap Idx Inv CI | | 03/26/2009 | Vanguard Variable Insurance Fund Portfolios | 10/20/2009 | Vanguard Variable Insurance Fund Portfolios | 1,912,000 | 15,701 | 22,329 | 15,701 | | | | | | | 6,628 | 6,628 | | |
| 922174-10-7 | Fidelity Money Market | | 12/30/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 6,400,672,000 | 6,400,672 | 6,400,672 | 6,400,672 | | | | | | | | | 14,463 | |
| 922174-20-6 | Fidelity VIP High Income Initl | | 09/08/2009 | Fidelity Variable Insurance Products | 12/10/2009 | Fidelity Variable Insurance Products | 781,000 | 4,047 | 4,308 | 4,047 | | | | | | | 262 | 262 | | |
| 922174-30-5 | Fidelity Equity Income | | 02/13/2009 | Fidelity Variable Insurance Products | 06/02/2009 | Fidelity Variable Insurance Products | 3,000 | 43 | 47 | 43 | | | | | | | 3 | 3 | | |
| 922174-46-1 | Fidelity VIP Freedom 2030 Ser 2 | | 04/24/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 4,705,000 | 32,950 | 35,930 | 32,950 | | | | | | | 2,980 | 2,980 | | |
| 922174-49-5 | Fidelity Vip Freedom 2025 Ser 2 | | 04/20/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 1,801,000 | 12,745 | 14,509 | 12,745 | | | | | | | 1,764 | 1,764 | 9 | |
| 922174-53-7 | Fidelity VIP Freedom 2020 Ser 2 | | 04/14/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 10,000 | 76 | 87 | 76 | | | | | | | 11 | 11 | | |
| 922174-66-9 | Fidelity VIP Freedom Inc Ser 2 | | 06/16/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 2,000 | 17 | 15 | 17 | | | | | | | (2) | (2) | | |
| 922174-83-4 | Fidelity VIP Money Mkt Serv CI | | 10/07/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 6,364,542,000 | 6,364,540 | 6,364,542 | 6,364,540 | | | | | | | 4 | 4 | 14,608 | |
| 922174-87-5 | Fidelity VIP Overseas Ser 2 | | 08/06/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 2,466,000 | 29,056 | 36,865 | 29,056 | | | | | | | 7,808 | 7,808 | 702 | |
| 922175-30-2 | Fidelity Index 500 | | 06/24/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 43,000 | 3,883 | 4,262 | 3,883 | | | | | | | 379 | 379 | 2 | |

E15.3

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE D - PART 5

Showing All Long-Term Bonds and Stocks ACQUIRED During Year and Fully DISPOSED OF During Current Year

| 1 CUSIP Identi- fication | 2 Description | 3 For- eign | 4 Date Acquired | 5 Name of Vendor | 6 Disposal Date | 7 Name of Purchaser | 8 Par Value (Bonds) or Number of Shares (Stock) | 9 Actual Cost | 10 Consid- eration | 11 Book/ Adjusted Carrying Value at Disposal | Change in Book/Adjusted Carrying Value | | | | | 17 Foreign Exchange Gain (Loss) on Disposal | 18 Realized Gain (Loss) on Disposal | 19 Total Gain (Loss) on Disposal | 20 Interest and Dividends Received During Year | 21 Paid for Accrued Interest and Dividends |
|--|---------------------|-------------------|-----------------------|--------------------------------------|-----------------------|--------------------------------------|---|------------------|--------------------------|---|--|--|--|--|---|--|---|---|---|--|
| | | | | | | | | | | | 12 Unrealized Valuation Increase/ (Decrease) | 13 Current Year's (Amort- ization)/ Accretion | 14 Current Year's Other Than Temporary Impairment Recognized | 15 Total Change in Book/ Adjusted Carrying Value (12 + 13 - 14) | 16 Total Foreign Exchange Change in Book/ Adjusted Carrying Value | | | | | |
| 922175-50-0 | Fidelity Contrafund | | 11/06/2009 | Fidelity Variable Insurance Products | 12/31/2009 | Fidelity Variable Insurance Products | 0.000 | .7 | .2 | .7 | | | | | | | (5) | (5) | | |
| 9299999. Common Stocks - Mutual Funds | | | | | | | | 28,738,018 | 29,373,024 | 28,738,018 | | | | | | | 635,006 | 635,006 | 251,901 | |
| 9799998. Total - Common Stocks | | | | | | | | 28,738,018 | 29,373,024 | 28,738,018 | | | | | | | 635,006 | 635,006 | 251,901 | |
| 9899999. Total - Preferred and Common Stocks | | | | | | | | 28,738,018 | 29,373,024 | 28,738,018 | | | | | | | 635,006 | 635,006 | 251,901 | |
| 9999999 - Totals | | | | | | | | 71,596,869 | 72,130,024 | 70,617,189 | | | | (979,681) | (979,681) | | 1,512,834 | 1,512,834 | 1,058,850 | 107,502 |

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE SEPARATE ACCOUNTS OF THE Symetra Life Insurance Company

SCHEDULE DA - PART 1

Showing All SHORT-TERM INVESTMENTS Owned December 31 of Current Year

| 1 CUSIP Identi- fication | 2 Description | Codes | | 5 Date Acquired | 6 Name of Vendor | 7 Maturity Date | 8 Book/ Adjusted Carrying Value | Change in Book/Adjusted Carrying Value | | | | 13 Par Value | 14 Actual Cost | Interest | | | | | 21 Paid for Accrued Interest | |
|---|------------------|-----------|-------------------|-----------------------|---------------------|-----------------------|---|---|--|--|---|-----------------|-------------------|--|--|------------------|-------------------------------|--------------------|---------------------------------------|--|
| | | 3 Code | 4 For- eign | | | | | 9 Unrealized Valuation Increase/ (Decrease) | 10 Current Year's (Amor- tization)/ Accretion | 11 Current Year's Other Than Temporary Impairment Recognized | 12 Total Foreign Exchange Change in Book/ Adjusted Carrying Value | | | 15 Amount Due and Accrued Dec. 31 of Current Year on Bonds not in Default | 16 Non- Admitted Due and Accrued | 17 Rate of | 18 Effective Rate of | 19 When Paid | | 20 Amount Received During Year |
| 0399999. Total - U.S. Government Bonds | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 1099999. Total - All Other Government Bonds | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 1799999. Total - U.S. States, Territories and Possessions Bonds | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 2499999. Total - U.S. Political Subdivisions of States, Territories and Possessions Bonds | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 3199999. Total - U.S. Special Revenues Bonds | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 3899999. Total - Industrial and Miscellaneous Bonds (Unaffiliated) | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 4199999. Total - Credit Tenant Loans | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 4899999. Total - Hybrid Securities | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 7799999. Total - Issuer Obligations | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 7899999. Total - Single Class Mortgage-Backed/Asset-Backed Securities | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 7999999. Total - Defined Multi-Class Residential Mortgage-Backed Securities | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 8099999. Total - Other Multi-Class Residential Mortgage-Backed Securities | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 8199999. Total - Defined Multi-Class Commercial Mortgage-Backed Securities | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 8299999. Total - Other Multi-Class Commercial Mortgage-Backed/Asset-Backed Securities | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 8399999. Total Bonds | | | | | | | | | | | | | | | | XXX | XXX | XXX | | |
| 8699999. Total - Parent, Subsidiaries and Affiliates | | | | | | | | | | | | XXX | | | | XXX | XXX | XXX | | |
| 481200-67-0 JP MORGAN OVERNIGHT SWEEP | | | | 12/31/2009 | Various | | XXX | 124,394,520 | | | | | 124,394,520 | | | 0.000 | 0.000 | Monthly | 32,630 | |
| 8899999. Exempt Money Market Mutual Funds | | | | | | | | 124,394,520 | | | | XXX | 124,394,520 | | | XXX | XXX | XXX | 32,630 | |
| 9199999 - Totals | | | | | | | | 124,394,520 | | | | XXX | 124,394,520 | | | XXX | XXX | XXX | 32,630 | |

E17

Schedule DB - Part A - Section 1 - Options, Caps, Floors and Insurance Futures Options Owned

N O N E

Schedule DB - Part A - Section 2 - Options, Caps, Floors and Insurance Futures Options Acquired

N O N E

Schedule DB - Part A - Section 3 - Options, Caps, Floors and Insurance Futures Options Terminated

N O N E

Schedule DB - Part B - Section 1 - Options, Caps, Floors and Insurance Futures Options Written and
In Force

N O N E

Schedule DB - Part B - Section 2 - Options, Caps, Floors and Insurance Futures Options Written

N O N E

Schedule DB - Part B - Section 3 - Options, Caps, Floors and Insurance Futures Options Terminated

N O N E

Schedule DB - Part C - Section 1 - Collar, Swap and Forwards Open

N O N E

Schedule DB - Part C - Section 2 - Collar, Swap and Forwards Opened

N O N E

Schedule DB - Part C - Section 3 - Collar, Swap and Forwards Terminated

N O N E

Schedule DB - Part D - Section 1 - Futures Contracts and Insurance Futures Contracts Open

N O N E

Schedule DB - Part D - Section 2 - Futures Contracts and Insurance Futures Contracts Opened

N O N E

Schedule DB - Part D - Section 3 - Futures Contracts and Insurance Futures Contracts Terminated

N O N E

Schedule DB - Part E - Section 1 - Counterparty Exposure for Derivative Instruments Open

N O N E

Schedule E - Part 2 - Cash Equivalents Owned

N O N E

Schedule E - Part 3 - Special Deposits

N O N E

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