

LIFE AND ACCIDENT AND HEALTH COMPANIES - ASSOCIATION EDITION

ANNUAL STATEMENT

FOR THE YEAR ENDED DECEMBER 31, 2010 OF THE CONDITION AND AFFAIRS OF THE

Symetra National Life Insurance Company

Code 1129 1129 NAIC Company Code 90581 Employer's ID Number 91-1079693

Organized under the Laws of	(Current) (Prior) Washington	, St	ate of Domicile or Port of En	ntry	Washington			
Country of Domicile		United States of	America_	-				
Incorporated/Organized	09/04/1979	<u>_</u> _	Commenced Business		9/05/1979			
Statutory Home Office	777 108th Avenue NE Suite 1	200		Bellevue , WA 9800	14			
	(Street and Number)		(C	ity or Town, State and Z		_		
Main Administrative Office		777 108th Avenue N	E, Suite 1200					
	January 1414 00004	(Street and N	umber)	405 050 0000				
			(A	425-256-8000 Area Code) (Telephone I	Number)			
Mail Address	P.O. Boy 34690			Seattle , WA 98124-1	690			
			(C	ity or Town, State and Z		•		
Primary Location of Books and Recor	ds	777 108th Avenue I	NE. Suite 1200					
,		(Street and N						
				425-256-8000 Area Code) (Telephone I	Number)			
, ,	, m, claic and ap code,		·	mod doda, (v oropinario				
Internet Website Address		www.symeti	a.com					
Statutory Statement Contact		nalighi	,	425-256-8				
kristin.l	, ,			(Area Code) (Teleph 425-256-5818	one Number)			
	E-mail Address)			(FAX Number)				
B (1)	77	OFFICE	· · -	0 11				
· · · · · · · · · · · · · · · · · · ·	United Standard Curley # Directions in the related with service President John Eric Galaviz Vice President John Eric Galaviz Vice President Michael Bidner Alberta Simone Thompson # Vice President John Eric Galaviz Vice President Jo				Colleen Mary Murphy Fommie David Brooks			
Secretary	George Christopher Pag	<u> </u>	Chief Actuary		ile David Brooks			
Colin Michael Elder Vid	o President	OTHE Lydia May Flora #		Michael Willian	n Fry Senior Vice Pro	esident		
John Eric Galaviz Vic	President Sh	eridan Houston Holler	nder # Vice President	Christine Ann Katzma	ar Holmes # Senior V	ice President		
		Linda Corlett Mahaffe Michael Fintan Murph			McSheridan Vice P er Pirak Vice Presid			
			y ii tioo i josident					
		DIRECTORS OR	TRUSTEES					
		Michael Wi	lliam Fry		Richard Guilbert #			
Thomas Michael N	larra #	Margaret Alic	ce Meister	George	e Christopher Pagos			
State of W	nahinatan							
State ofW County of		S:						
all of the herein described assets w statement, together with related exhi condition and affairs of the said repo in accordance with the NAIC Annua rules or regulations require differer respectively. Furthermore, the scop	ere the absolute property of the soits, schedules and explanations truing entity as of the reporting period to the statement Instructions and According the reporting not related to be of this attestation by the describer.	said reporting entity, therein contained, and od stated above, and ounting Practices and accounting practices also included	ree and clear from any lien- exed or referred to, is a full of its income and deduction. Procedures manual except and procedures, according des the related corresponding	s or claims thereon, ex and true statement of al s therefrom for the peric to the extent that: (1) st g to the best of their ng electronic filing with	cept as herein stated I the assets and liabili d ended, and have be ate law may differ; or information, knowled the NAIC, when requ	I, and that this ities and of the een completed r, (2) that state ge and belief ired, that is ar		
1 n1 n	-Zar	10 10	11 2	(20	n	,		
- V 101, 100		mger f	(Coll	Muyo	y_		
	a	Margaret Alic Chief Financi		(Colleen Mary Murphy Treasurer	V		
Subscribed and sworn to before me day of			a. Is this an original filir b. If no, 1. State the amendn 2. Date filed 3. Number of pages	nent number	Yes [X] No [J		



ASSETS

			Current Year		Prior Year
		1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
1.	Bonds (Schedule D)				15,393,063
2.	Stocks (Schedule D):				
	2.1 Preferred stocks				498,650
	2.2 Common stocks				
3.	Mortgage loans on real estate (Schedule B):				
	3.1 First liens				
	3.2 Other than first liens.				
4.	Real estate (Schedule A):				
	4.1 Properties occupied by the company (less \$				
	encumbrances)				
	4.2 Properties held for the production of income (less succession of income (less succession))				
	4.3 Properties held for sale (less \$				
	encumbrances)				
5.	Cash (\$28,902 , Schedule E - Part 1), cash equivalents				
	(\$, Schedule E - Part 2) and short-term				
	investments (\$226,797 , Schedule DA)	255.699		255.699	385.506
6.	Contract loans (including \$ premium notes)				190.421
7.	Derivatives				
8.	Other invested assets (Schedule BA)				
9.	Receivables for securities				
10.	Securities lending reinvested collateral assets				
11.	Aggregate write-ins for invested assets				
12.	Subtotals, cash and invested assets (Lines 1 to 11)				
	Title plants less \$ charged off (for Title insurers	10,001,323		10,001,323	10,400,921
13.					
1.1	only) Investment income due and accrued				171 014
14.		102,920		132,923	171,014
15.	Premiums and considerations: 15.1 Uncollected premiums and agents' balances in the course of collection	2 202		2 202	2 021
	15.2 Deferred premiums and agents' balances and installments booked but				,001
	deferred and not yet due (including \$				
	earned but unbilled premiums)	46 403		46,403	50,269
				40,403	50,209
10	15.3 Accrued retrospective premiums				
16.	Reinsurance:				
	16.1 Amounts recoverable from reinsurers				
	16.2 Funds held by or deposited with reinsured companies				
17.	16.3 Other amounts receivable under reinsurance contracts				
	Amounts receivable relating to uninsured plans				
18.1	Current federal and foreign income tax recoverable and interest thereon Net deferred tax asset				
		*	,	, , , , , , , , , , , , , , , , , , ,	,
19.	Guaranty funds receivable or on deposit				
20.	Electronic data processing equipment and software				
21.	Furniture and equipment, including health care delivery assets				
00	(\$				
22.	Net adjustment in assets and liabilities due to foreign exchange rates				
23.	Receivables from parent, subsidiaries and affiliates				
24.	Health care (\$				200
25.	Aggregate write-ins for other than invested assets	50	50		300
26.	Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	17,770,485	634,006	17, 136, 479	16,784,114
27.	From Separate Accounts, Segregated Accounts and Protected Cell Accounts		,	,,	
28.	Total (Lines 26 and 27)	17,770,485	634,006	17,136,479	16,784,114
	DETAILS OF WRITE-INS	, , , , , , , , , , , , , , , , , , , ,	,	,,	*, * ,
1101.					
1102.					
1103.					
1198.	Summary of remaining write-ins for Line 11 from overflow page				
1199.	Totals (Lines 1101 thru 1103 plus 1198)(Line 11 above)				
2501.	Other Assets	50	50		300
2502.	Other Assets				500
2502. 2503.					
2598.	Summary of remaining write-ins for Line 25 from overflow page				
2599.	Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	50			300
	,	- 30	- 00	<u> </u>	500

LIABILITIES, SURPLUS AND OTHER FUNDS

		1 Current Year	2 Prior Year
	gregate reserve for life contracts \$6, 178, 641 (Exh. 5, Line 9999999) less \$		
inc	cluded in Line 6.3 (including \$	6, 178, 641	6,339,708
Z. Agg	odco Reserve)		
3. Lial	bility for deposit-type contracts (Exhibit 7, Line 14, Col. 1) (including \$ Modco Reserve)		
	ntract claims:		
4.1	Life (Exhibit 8, Part 1, Line 4.4, Col. 1 less sum of Cols. 9, 10 and 11)	2,000	2,000
5. Pol	licyholders' dividends \$ and coupons \$ due and unpaid (Exhibit 4,		
Liı	ne 10)		
	ovision for policyholders' dividends and coupons payable in following calendar year - estimated amounts:		
6.1	Dividends apportioned for payment (including \$ Modco)		
6.2	Coupons and similar benefits (including \$ Modco)		
7. Am	nount provisionally held for deferred dividend policies not included in Line 6		
8. Pre	emiums and annuity considerations for life and accident and health contracts received in advance less		
	discount; including \$0 accident and health premiums (Exhibit 1,	0.004	0.004
	art 1, Col. 1, sum of lines 4 and 14)	3,001	2,981
	Surrender values on canceled contracts		
	Provision for experience rating refunds, including \$ accident and health experience rating		
	refunds		
9.3	Other amounts payable on reinsurance including \$ assumed and \$		
9.4	ceded		
10. Cor	mmissions to agents due or accrued-life and annuity contracts \$	00,000	00,730
\$	and deposit-type contract funds \$		56
	mmissions and expense allowances payable on reinsurance assumed		
	neral expenses due or accrued (Exhibit 2, Line 12, Col. 6)	897	1,060
	lowances recognized in reserves, net of reinsured allowances)		
14. Tax	xes, licenses and fees due or accrued, excluding federal income taxes (Exhibit 3, Line 9, Col. 5)	15 . 567	15,619
15.1 Cur	rrent federal and foreign income taxes including \$411 on realized capital gains (losses)	48,511	35,012
	t deferred tax liability		
	earned investment incomeounts withheld or retained by company as agent or trustee		6,824 260
	nounts held for agents' account, including \$ agents or trustee agents' credit balances		200
19. Rei	mittances and items not allocated	(126)	
20. Net	t adjustment in assets and liabilities due to foreign exchange rates		
21. Lial	bility for benefits for employees and agents if not included above		
	rrowed money \$ and interest thereon \$		
	scellaneous liabilities:		
	.01 Asset valuation reserve (AVR, Line 16, Col. 7)	48, 197	50,491
	.03 Funds held under reinsurance treaties with unauthorized reinsurers	40 F74	00 505
		· ·	22,595
	06 Liability for amounts held under uninsured plans		
	07 Funds held under coinsurance		
	08 Derivatives		
	09 Payable for securities		
	11 Capital notes \$ and interest thereon \$		
25. Agg	gregate write-ins for liabilities	18	22
	tal Liabilities excluding Separate Accounts business (Lines 1 to 25)	6,385,341	6,540,528
	om Separate Accounts Statement	6,385,341	C E40 E00
	mmon capital stock		6,540,528 2,500,000
30. Pre	eferred capital stock		······
31. Agg	gregate write-ins for other than special surplus funds		
32. Sur	rplus notes		4 500 000
33. Gro	oss paid in and contributed surplus (Page 3, Line 33, Col. 2 plus Page 4, Line 51.1, Col. 1)gregate write-ins for special surplus funds	4,500,000	4,500,000 35,126
	assigned funds (surplus)	3.717 916	3,208,460
36. Les	ss treasury stock, at cost:		2,200,100
	1shares common (value included in Line 29 \$)		
	2 shares preferred (value included in Line 30 \$)		7 740 500
	tals of Lines 29, 30 and 37 (Page 4, Line 55)	8,251,138 10,751,138	7,743,586 10,243,586
	tals of Lines 28 and 38 (Page 2, Line 28, Col. 3)	17, 136, 479	16,784,114
	TAILS OF WRITE-INS	,,	,,,,-11
	rued interest on policy claims	18	22
2502 2503.			
	mmary of remaining write-ins for Line 25 from overflow page		
	tals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	18	22
	mmary of remaining write-ins for Line 31 from overflow page		
	mmary of remaining write-ins for Line 31 from overflow page		
	erred tax asset adjustment related to SSAP #10R	33 222	35, 126
	orred tax asset adjustment forated to com a for	,	
3403			
	mmary of remaining write-ins for Line 34 from overflow page		0F 400
3499. Tot	tals (Lines 3401 thru 3403 plus 3498)(Line 34 above)	33,222	35,126

SUMMARY OF OPERATIONS

		1	2
		Current Year	Prior Year
1.	Premiums and annuity considerations for life and accident and health contracts (Exhibit 1, Part 1, Line 20.4, Col. 1, less Col. 11)	297 410	316 302
2.	Considerations for supplementary contracts with life contingencies		
3.	Net investment income (Exhibit of Net Investment Income, Line 17)		
4.	Amortization of interest maintenance reserve (IMR, Line 5)		
5.	Separate Accounts net gain from operations excluding unrealized gains or losses		
6.	Commissions and expense allowances on reinsurance ceded (Exhibit 1, Part 2, Line 26.1, Col. 1)		
7. 8.	Reserve adjustments on reinsurance ceded		
0.	8.1 Income from fees associated with investment management, administration and contract guarantees from Separate		
	Accounts		
	8.2 Charges and fees for deposit-type contracts		
	8.3 Aggregate write-ins for miscellaneous income		
9.	Total (Lines 1 to 8.3)	1,103,560	1,142,323
10.	Death benefits		157,573
11.	Matured endowments (excluding guaranteed annual pure endowments)		
12.	Annuity benefits (Exhibit 8, Part 2, Line 6.4, Cols. 4 + 8)		
13. 14.	Disability benefits and benefits under accident and health contracts		
15.	Surrender benefits and withdrawals for life contracts		
16.	Group conversions		
17.	Interest and adjustments on contract or deposit-type contract funds		
18.	Payments on supplementary contracts with life contingencies		
19.	Increase in aggregate reserves for life and accident and health contracts	(161,067)	191,410
20.	Totals (Lines 10 to 19)	138,362	449,955
21.	Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only) (Exhibit 1, Part		
	2, Line 31, Col. 1)	1,054	944
22.	Commissions and expense allowances on reinsurance assumed (Exhibit 1, Part 2, Line 26.2, Col. 1)		
23. 24.	General insurance expenses (Exhibit 2, Line 10, Cols. 1, 2, 3 and 4)	147,990	
25.	Increase in loading on deferred and uncollected premiums	(344)	5 924
26.	Net transfers to or (from) Separate Accounts net of reinsurance.		
27.	Aggregate write-ins for deductions		
28.	Totals (Lines 20 to 27)	354,236	720,433
29.	Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)	749,323	421,890
30.	Dividends to policyholders	·	
31.	Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30)	749,323	421,890
32.	Federal and foreign income taxes incurred (excluding tax on capital gains)	232,283	179,847
33.	Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or	547.040	040.040
0.4	(losses) (Line 31 minus Line 32)	517,040	242,043
34.	Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of \$	(7,004)	(1.048)
35.	\$. , ,	240.995
33.	CAPITAL AND SURPLUS ACCOUNT		240,000
36.	Capital and surplus, December 31, prior year (Page 3, Line 38, Col. 2)	10,243,586	10,985,201
37.	Net income (Line 35)		240,995
38.	Change in net unrealized capital gains (losses) less capital gains tax of \$		
39.	Change in net unrealized foreign exchange capital gain (loss)		
40.	Change in net deferred income tax	(21, 178)	34,460
41.	Change in nonadmitted assets		
42.	Change in liability for reinsurance in unauthorized companies		
43.	Change in reserve on account of change in valuation basis, (increase) or decrease (Exh. 5A, Line 9999999, Col. 4)		
44.	Change in asset valuation reserve		
45.	Change in treasury stock (Page 3, Lines 36.1 and 36.2, Col. 2 minus Col. 1)		
46. 47.	Surplus (contributed to) withdrawn from Separate Accounts during period		
48.	Change in surplus notes		
49.			
50.	Capital changes:		
	50.1 Paid in		
	50.2 Transferred from surplus (Stock Dividend)		
	50.3 Transferred to surplus		
51.	Surplus adjustment:		
	51.1 Paid in		
	51.2 Transferred to capital (Stock Dividend)		
	51.3 Transferred from capital		
52.	51.4 Change in surplus as a result of reinsurance		
	Dividends to stockholders		
53. 54.	Aggregate write-ins for gains and losses in surplus	(1,904) 507,552	35, 126 (741, 615)
55.	Capital and surplus, December 31, current year (Lines 36 + 54) (Page 3, Line 38)	10,751,138	10,243,586
- 55.	DETAILS OF WRITE-INS	13,131,100	10,270,000
08.301.	DETAILED OF WHITE-INC		
08.303.			
08.398.	Summary of remaining write-ins for Line 8.3 from overflow page		
08.399.	Totals (Lines 08.301 thru 08.303 plus 08.398)(Line 8.3 above)		
2701.			
2702.			
2703.			
	Summary of remaining write-ins for Line 27 from overflow page		
	Totals (Lines 2701 thru 2703 plus 2798)(Line 27 above)	,,	
	Deferred tax asset adjustment related to SSAP #10R		
5302.			
5303.			
	Summary of remaining write-ins for Line 53 from overflow page		
	Totals (Lines 5301 thru 5303 plus 5398)(Line 53 above)	(1,904)	35, 126

	CASITILOW	1 1	2
		Current Year	Prior Year
	Cash from Operations	Current Year	Prior Year
1.	Premiums collected net of reinsurance	302 080	323,268
2.	Net investment income		867,738
3.	Miscellaneous income		
4.	Total (Lines 1 through 3)		1,191,006
5.	Benefit and loss related payments	, ,	258,545
6.	Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts		250,040
7.	Commissions, expenses paid and aggregate write-ins for deductions		259,514
8.	Dividends paid to policyholders		209,014
9.	Federal and foreign income taxes paid (recovered) net of \$		190,391
10.	Total (Lines 5 through 9)		708,450
11.	Net cash from operations (Line 4 minus Line 10)	414,469	482,556
	Out to the standard		
10	Cash from Investments		
12.	Proceeds from investments sold, matured or repaid:	2 202 777	0.071.614
	12.1 Bonds		
	12.2 Stocks	, i	
	12.3 Mortgage loans		
	12.4 Real estate		
	12.5 Other invested assets		
	12.6 Net gains or (losses) on cash, cash equivalents and short-term investments		
	12.7 Miscellaneous proceeds		
	12.8 Total investment proceeds (Lines 12.1 to 12.7)	3,885,340	2,071,614
13.	Cost of investments acquired (long-term only):		
	13.1 Bonds	4,448,564	1,764,441
	13.2 Stocks		
	13.3 Mortgage loans		
	13.4 Real estate		
	13.5 Other invested assets		
	13.6 Miscellaneous applications		15,469
	13.7 Total investments acquired (Lines 13.1 to 13.6)	4,448,564	1,779,910
14.	Net increase (decrease) in contract loans and premium notes	(22,087)	(16,005)
15.	Net cash from investments (Line 12.8 minus Line 13.7 minus Line 14)	(541, 138)	307,709
	Cash from Financing and Miscellaneous Sources		
16.	Cash provided (applied):		
	16.1 Surplus notes, capital notes		
	16.2 Capital and paid in surplus, less treasury stock		
	16.3 Borrowed funds		
	16.4 Net deposits on deposit-type contracts and other insurance liabilities		
	16.5 Dividends to stockholders		1,000,000
	16.6 Other cash provided (applied)	(3,139)	(21, 172)
17.	Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6)		(1,021,172)
	,	(-,/	, , , /
	RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS		
18.	Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	(129,808)	(230,907)
19.	Cash, cash equivalents and short-term investments:	,,	,,, /
	19.1 Beginning of year	385,506	616,413
	19.2 End of year (Line 18 plus Line 19.1)	255,698	385,506
	.o.z zd o. your (zino to plao zino to.)	200,000	303,300

Ν	lote: Supplemental disclosures of cash flow information for non-cash transactions:		

ANALYSIS OF OPERATIONS BY LINES OF BUSINESS

		. 1		<u> </u>		<u> </u>	3 OF BUS						
		1	2	3	Ordinary 4	-	6	Gr	oup	9	Accident and Health	11	12 Aggregate of All
				3	4	Supplementary	Credit Life (Group	Life Insurance	8	9	Credit (Group and	11	Other Lines of
		Total	Industrial Life	Life Insurance	Individual Annuities	Contracts	and Individual)	(a)	Annuities	Group	Individual)	Other	Business
1.	Premiums and annuity considerations for life and accident and health						,	` '			,		1
	contracts	297,410		297,410									
2.	Considerations for supplementary contracts with life contingencies												
3.	Net investment income	799,097		799,097									
4.	Amortization of Interest Maintenance Reserve (IMR)	7,053		7,053									
5.	Separate Accounts net gain from operations excluding unrealized gains or losses												
6.	Commissions and expense allowances on reinsurance ceded												
7.	Reserve adjustments on reinsurance ceded												
8.	Miscellaneous Income: 8.1 Fees associated with income from investment management,												
	administration and contract guarantees from Separate Accounts												
	8.2 Charges and fees for deposit-type contracts												
	8.3 Aggregate write-ins for miscellaneous income												
9.	Totals (Lines 1 to 8.3)	1,103,560		1,103,560									
10.	Death benefits	206,732		206,732						ļ			
11.	Matured endowments (excluding guaranteed annual pure endowments)												
12.	Annuity benefits												
13.	Disability benefits and benefits under accident and health contracts	6,644		6,644									
14.	Coupons, guaranteed annual pure endowments and similar benefits												
15.	Surrender benefits and withdrawals for life contracts	84,736		84,736									
16.	Group conversions												
17.	Interest and adjustments on contract or deposit-type contract funds	1,318		1,318									
18.	Payments on supplementary contracts with life contingencies												
19.	Increase in aggregate reserves for life and accident and health contracts	(161,067)		(161,067)								
20.	Totals (Lines 10 to 19)	138,362		138,362									
21.	Commissions on premiums, annuity considerations and deposit-type contract funds (direct business only)	1,054		1,054									
22.	Commissions and expense allowances on reinsurance assumed												
23.	General insurance expenses	147,990		147,990									
24.	Insurance taxes, licenses and fees, excluding federal income taxes	67, 174		67, 174									
25.	Increase in loading on deferred and uncollected premiums	(344)		(344)								
26.	Net transfers to or (from) Separate Accounts net of reinsurance.												
27.	Aggregate write-ins for deductions												
28.	Totals (Lines 20 to 27)	354,236		354,236									
29.	Net gain from operations before dividends to policyholders and federal												
	income taxes (Line 9 minus Line 28)	749,323		749,323						ļ			
30.	Dividends to policyholders												
31.	Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30)	749,323		749,323									
32.	Federal income taxes incurred (excluding tax on capital gains)	232,283		232,283									
33.	Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or (losses) (Line 31 minus Line 32)	517,040		517,040									
	DETAILS OF WRITE-INS											-	
08.301.							<u> </u>			<u> </u>			
08.302.													
08.303.													
08.398.	Summary of remaining write-ins for Line 8.3 from overflow page												
08.399.	Totals (Lines 08.301 thru 08.303 plus 08.398) (Line 8.3 above)				<u> </u>			<u> </u>		<u> </u>			<u> </u>
2701.													
2702.													
2703.													
2798.	Summary of remaining write-ins for Line 27 from overflow page												
	Totals (Lines 2701 thru 2703 plus 2798) (Line 27 above)												
-	(a) Includes the following amounts for FEGLI/SGLI: Line 1	Line 10		Line 16		Line 23		Line 24			•		

ANALYSIS OF INCREASE IN RESERVES DURING THE YEAR

AITALIOIO OI I								
	1	2		Ordinary		6	Gro	oup
			3	4	5		7	8
	Total	Industrial Life	Life Insurance	Individual Annuities	Supplementary Contracts	Credit Life (Group and Individual)	Life Insurance	Annuities
			Ziio iiiodi aiioo	marrada / marado	Contracto		2.10 11.00.01.100	7
Involving Life or Disability Contingencies (Reserves)								
(Net of Reinsurance Ceded)								
Reserve December 31, prior year	6,339,708		6,339,708					
Tabular net premiums or considerations	246,959		246,959					
	.,		, , , , , , , , , , , , , , , , , , , ,					
Present value of disability claims incurred					XXX			
4. Tabular interest	224,947		224,947					
Tabular less actual reserve released								
5. Tabulal less actual leselve leleaseu								
6. Increase in reserve on account of change in valuation basis								
7. Other increases (net)								
8. Totals (Lines 1 to 7)	6,811,614		6,811,614					
9. Tabular cost	524,257		524,257		XXX			
			44.545					
10. Reserves released by death	11,545		11,545	XXX	XXX			XXX
11. Reserves released by other terminations (net)	97, 171		97, 171					
12. Annuity, supplementary contract and disability payments involving life contingencies								
13. Net transfers to or (from) Separate Accounts								
14. Total Deductions (Lines 9 to 13)	632,973		632,973					
	,		·					
15. Reserve December 31, current year	6,178,641		6,178,641					

EXHIBIT OF NET INVESTMENT INCOME

		1	2
		Collected During Year	
1.	U.S. Government bonds	(a)285, 125	279,282
1.1	Bonds exempt from U.S. tax	(a)	
1.2	Other bonds (unaffiliated)	(a)508,978	496,802
1.3	Bonds of affiliates	(a)	
2.1	Preferred stocks (unaffiliated)	(b)22,450	22,450
2.11	Preferred stocks of affiliates	(b)	
2.2	Common stocks (unaffiliated)		
2.21	Common stocks of affiliates		
3.	Mortgage loans	(c)	
4.	Real estate	(d)	
5	Contract loans	8,810	10,036
6	Cash, cash equivalents and short-term investments	(e)716	644
7	Derivative instruments	(f)	
8.	Other invested assets		
9.	Aggregate write-ins for investment income	8, 182	8, 182
10.	Total gross investment income	834,261	817,396
11.	Investment expenses		(g)18,299
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)		18,299
17.	Net investment income (Line 10 minus Line 16)		799,097
	DETAILS OF WRITE-INS		
0901.	Misc Securities Income	8, 182	
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)	8, 182	8, 182
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 \$	23,208	accrual of discount less \$	65,303	amortization of premium and less \$	8,920	paid for accrued interest on purchases.	
(b) Includes \$	1,350	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 building	s; and excludes \$. interest on encur	mbrances.	
(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.			
	and Separate Acco		\$	investment taxes, licenses and f	ees, excluding fede	eral income taxes, attributable to	
(h) Includes \$		interest on surplus notes a	nd \$	interest on capital notes.			
(i) Includes \$		depreciation on real estate	e and \$	depreciation on other inves	ted 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					
1.1	Bonds exempt from U.S. tax					
1.2	Other bonds (unaffiliated)	9,817		9,817		
1.3	Bonds of affiliates					
2.1	Preferred stocks (unaffiliated)					
2.11	Preferred stocks of affiliates					
2.2	Common stocks (unaffiliated)					
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)					
10.	Total capital gains (losses)	9,817		9,817		
	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)					

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ANNUAL STATEMENT FOR THE YEAR 2010 OF THE Symetra National Life Insurance Company

EXHIBIT - 1 PART 1 - PREMIUMS AND ANNUITY CONSIDERATIONS FOR LIFE AND ACCIDENT AND HEALTH CONTRACTS

	EXHIBIT - 1 PAR	l 1 - PKEMII	UMS AND A	MNULLY CC	NSIDEKAT	IONS FOR L	IFE AND A	JCIDENI AI	ND HEALIH	CONTRAC	15	
		1	2	Ord	inary	5	Gr	oup		Accident and Health		11
				3	4		6	7	8	9	10	Aggregate of All
		Total	Industrial Life	Life Insurance	Individual Annuities	Credit Life (Group and Individual)	Life Insurance	Annuities	Group	Credit (Group and Individual)	Other	Other Lines of Business
	FIRST YEAR (other than single)					,			,	,		
	Uncollected											
	Deferred and accrued											
3	Deferred , accrued and uncollected:											
	3.1 Direct											
	3.2 Reinsurance assumed											
	3.3 Reinsurance ceded											
	3.4 Net (Line 1 + Line 2)											
4	Advance											
5												
6	Collected during year:											
	6.1 Direct											
	6.2 Reinsurance assumed											
	6.3 Reinsurance ceded											
	6.4 Net											
	Line 5 + Line 6.4											
	Prior year (uncollected + deferred and accrued - advance)											
9	First year premiums and considerations:											
	9.1 Direct											
	9.2 Reinsurance assumed											
	9.3 Reinsurance ceded											
	9.4 Net (Line 7 - Line 8)											
	SINGLE											
10	Single premiums and considerations:											
	10.1 Direct											
	10.2 Reinsurance assumed											
	10.3 Reinsurance ceded											
	10.4 Net											
	RENEWAL											
	Uncollected	4,041		4,041								
	Deferred and accrued	60,562		60,562								
13	Deferred, accrued and uncollected:											
	13.1 Direct	64,603		64,603								
	13.2 Reinsurance assumed											
	13.3 Reinsurance ceded											
	13.4 Net (Line 11 + Line 12)	64,603		64,603								
	Advance	3,001		3,001								
	Line 13.4 - Line 14	61,602		61,602								
16	Collected during year:											
	16.1 Direct	302,089		302,089								
	16.2 Reinsurance assumed								}			
	16.3 Reinsurance ceded	***************************************				 			}			
	16.4 Net	302,089		302,089		 			}	 		
17.	Line 15 + Line 16.4	363,691		363,691		 			}			
18	Prior year (uncollected + deferred and accrued - advance)	66,281		66,281		}			·			
19	Renewal premiums and considerations:	007 440		007 440								
1	19.1 Direct	297,410		297,410								
	19.2 Reinsurance assumed											
	19.3 Reinsurance ceded	007.440										
1	19.4 Net (Line 17 - Line 18)	. 297,410		297,410					-			
00	TOTAL											
20.	Total premiums and annuity considerations:	007 4:0		007 110								
	20.1 Direct	297,410		297,410								
	20.2 Reinsurance assumed											
	20.3 Reinsurance ceded	007.410										
	20.4 Net (Lines 9.4 + 10.4 + 19.4)	297,410		297,410					I			

EXHIBIT - 1 PART 2 - DIVIDENDS AND COUPONS APPLIED, REINSURANCE COMMISSIONS AND EXPENSE ALLOWANCES AND COMMISSIONS INCURRED (Direct Business Only)

	1 1	2		inary	5	Gro		. <u> </u>	Accident and Health		11
	'	2	3	4	- `	6	7	8	9	10	╡ ''
	Total	Industrial Life	Life Insurance	Individual Annuities	Credit Life (Group and Individual)	Life Insurance	Annuities	Group	Credit (Group and Individual)	Other	Aggregate of All Other Lines of Business
DIVIDENDS AND COUPONS APPLIED											
(included in Part 1)											
21. To pay renewal premiums											
22. All other											
REINSURANCE COMMISSIONS AND											
EXPENSE ALLOWANCES INCURRED											
23. First year (other than single):											
23.1 Reinsurance ceded											
23.2 Reinsurance assumed											
23.3 Net ceded less assumed											
24. Single:											
24.1 Reinsurance ceded											
24.2 Reinsurance assumed											
24.3 Net ceded less assumed											
25. Renewal:											
25.1 Reinsurance ceded											
25.2 Reinsurance assumed											
25.3 Net ceded less assumed											
26. Totals:											
26.1 Reinsurance ceded (Page 6, Line 6)											
26.2 Reinsurance assumed (Page 6, Line 22)											
26.3 Net ceded less assumed											
COMMISSIONS INCURRED											
(direct business only)											
27. First year (other than single)											
28. Single											
29. Renewal			1,054								
30. Deposit-type contract funds	1,004		1,004								
31. Totals (to agree with Page 6, Line 21)	1,054		1,054								

EXHIBIT 2 - GENERAL EXPENSES

		Insui	ance		5	6
	1	Accident a	and Health	4		
	Life	2 Cost Containment	3 All Other	All Other Lines of Business	Investment	Total
1. Rent	6,249					6,249
Salaries and wages	75.731					75,731
	9,081					9.081
3.12 Contributions for benefit plans for agents						
, , , , , , , , , , , , , , , , , , , ,						
, ,	376					376
•						
ů ,						
4.4 Fees of public accountants and consulting actuaries						21.740
4.5 Expense of investigation and settlement of policy claims						
5.1 Traveling expenses						1 523
						1,020
5.3 Postage, express, telegraph and telephone						1,410
	1,723					1.723
	990					990
·	990					
	5,045					5.045
						2.687
	2,687 5,358					5.358
, ,						
	10.600					12.683
· ·	12,683	ł				12,003
, ,						
·						
· · · · · · · · · · · · · · · · · · ·						
0 , 1						
7.2 Agents' balances charged off (less \$ recovered)						
7.3 Agency conferences other than local meetings						
9.1 Real estate expenses						
9.2 Investment expenses not included elsewhere					18,299	18,299
9.3 Aggregate write-ins for expenses	3,394					3,394
General expenses incurred	147,990				18,299	(a)166,289
11. General expenses unpaid December 31, prior year					1,060	1,060
12. General expenses unpaid December 31, current year					897	897
13. Amounts receivable relating to uninsured plans, prior year						
14. Amounts receivable relating to uninsured plans, current year						
15. General expenses paid during year (Lines 10+11-12-13+14)	147,990				18,462	166,452
DETAILS OF WRITE-INS					,	·
	3,377					3,377
09.302. Miscellaneous	17					17
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)	3,394					3,394

(a) Includes management fees of \$ to affiliates and \$ to non-affiliates.

EXHIBIT 3 - TAXES, LICENSES AND FEES (EXCLUDING FEDERAL INCOME TAXES)

			Insurance		4	5
		1	2	3 All Other Lines of		
		Life	Accident and Health	Business	Investment	Total
1.	Real estate taxes					
2.	State insurance department licenses and fees	47,459				47,459
3.	State taxes on premiums	10,091				10,091
4.	Other state taxes, including \$					
	for employee benefits	2,903				2,903
5.	U.S. Social Security taxes					4,576
6.	All other taxes	2,146				2,146
7.	Taxes, licenses and fees incurred	67, 174				67, 174
8.	Taxes, licenses and fees unpaid December 31, prior year	15,619				15,619
9.	Taxes, licenses and fees unpaid December 31, current year	15.567				15.567
10.	Taxes, licenses and fees paid during year (Lines 7 + 8 - 9)	67,226				67,226

EXHIBIT 4 - DIVIDENDS OR REFLINDS

		1	2
		Life	Accident and Health
1.	Applied to pay renewal premiums		
2.	Applied to shorten the endowment or premium-paying period		
3.	Applied to provide paid-up additions		
4.	Applied to provide paid-up annuities		
5.	Total Lines 1 through 4		
6.	Paid in cash		
7.	Left on deposit		
8.	Aggregate write-ins for dividend or refund options		
9.	Total Lines 5 through 8		
10.	Amount due and unpaid		
11.	Provision for dividends or refunds payable in the following lendar year		
12.	Terminal dividends		
13.	Provision for deferred dividend contracts		
14.	Amount provisionally held for deferred dividend contract not included in Life 13		
15.	Total Lines 10 through 14		
16.	Total from prior year		
17.	Total dividends or refunds (Lines 9 + 15 - 16)		
	DETAILS OF WRITE-INS		
0801.			
0802.			
0803.			
0898.	Summary of remaining write-ins for Line 8 from overflow page		
0899.	Totals (Lines 0801 thru 0803 plus 0898) (Line 8 above)		

EXHIBIT 5 - AGGREGATE RESERVE FOR LIFE CONTRACTS

1	2	3	4	5 Credit	6
Valuation Standard	Total	Industrial	Ordinary	(Group and Individual)	Group
0100001 50 000 00/41 0 00/ (1005 1000)			522		
0100002. 58 CSO - CRVM 4.5% (1980 - 1988)					
0100003. 58 CSO - CRVM 5.5% (1982 - 1983)			14,092		
0100004. 58 CET - CRVM 4.5% (1980 - 1988)			045 500		
0100005. 58 CET - CRVM 5.5% (1984 - 1986)					
0100006. 80 CSO - CRVM 4.5% (1984 - 1989)	1 721 770		4		
			04 000		
0100007. 00 050 - CHVM 0.0% (1902 - 1909)			,		
0100008. 80 CSO - NLP 5.5% (1987 - 1989)					
0100009. GIR - 58 CSO - 2.0% (1982 - 1988)					
0100010. GIR - Extra Mortality on GIR options			26,286		
0199997. Totals (Gross)	4,709,184		4,709,184		
0199998. Reinsurance ceded					
0199999. Life Insurance: Totals (Net)	4,709,184		4,709,184		
0299998. Reinsurance ceded		XXX		XXX	
0299999. Annuities: Totals (Net)		XXX		XXX	
0399998. Reinsurance ceded		,,,,	†	,,,,,	
0399999. SCWLC: Totals (Net)					
0499998. Reinsurance ceded			+		
0499999. Accidental Death Benefits: Totals (Net)					
0500001. 1952 INTERCO DISA W/58 CSO - 5.0% (1980 - 1989)	3.090		3.090		
0500002. 1952 INTERCO DISA W/58 CSO - 4.5% (1980 -	, , , , , , , , , , , , , , , , , , , ,		,		
1989)	1,890 67,459		1,890 67,459		
0599997. Totals (Gross)	72.439		72.439		
0599998. Reinsurance ceded	12,400		12,400		
0599999. Disability-Active Lives: Totals (Net)	70, 400		70, 400		
	72,439		72,439		
0600001. 1952 INTERCO DISA W/58 CSO - 3.0% (1980 - 1989)	69,628		69,628		
0699997. Totals (Gross)	69,628		69,628		
0699998. Reinsurance ceded					
0699999. Disability-Disabled Lives: Totals (Net)	69.628		69.628		
0700001. For excess of valuation net premiums over	21,121				
corresponding gross premiums on respective					
policies, computed according to the standard of valuation required by this state.	60.737		60.737		
0700002. For non-deduction of deferred fractional					
premiums or return of premiums at the death of					
	13,768		13,768		
0700003. AG XXXII Reserve for Immediate Payment of					
Claims			2,885		
0700004. Cash Flow Testing Reserve	1,250,000		1,250,000		
0799997. Totals (Gross)	1,327,390		1,327,390		
0799998. Reinsurance ceded					
0799999. Miscellaneous Reserves: Totals (Net)	1,327,390		1,327,390		
			†		
			+		
9999999. Totals (Net) - Page 3, Line 1	6, 178, 641		6,178,641		

EXHIBIT 5 - INTERROGATORIES

.1	Has the reporting entity ever issued both participating and non-participating contracts?	Ye	es []	No [X]	
.2	If not, state which kind is issued. NON-PARTICIPATING					
2.1	Does the reporting entity at present issue both participating and non-participating contracts?	- Ye	es []	No [X]	
2.2	If not, state which kind is issued. NON-PARTICIPATING					
3.	Does the reporting entity at present issue or have in force contracts that contain non-guaranteed elements?	. Үе	∍s [)	X]	No []	
4.	Has the reporting entity any assessment or stipulated premium contracts in force? If so, state:	Ye	es []	No [X]	
	4.1 Amount of insurance?					
	4.2 Amount of reserve?\$	·				
	4.3 Basis of reserve:					
	4.4 Basis of regular assessments:					
	4.5 Basis of special assessments:					
	4.6 Assessments collected during the year\$					
5.	If the contract loan interest rate guaranteed in any one or more of its currently issued contracts is less than 5%, not in advance, state the contract loan rate guarantees on any such contracts. N/A					
6.	Does the reporting entity hold reserves for any annuity contracts that are less than the reserves that would be held on a standard basis?	Y	es []	No [X]	
	6.1 If so, state the amount of reserve on such contracts on the basis actually held:					
	6.2 That would have been held (on an exact or approximate basis) using the actual ages of the annuitants; the interest rate(s) used in 6.1; and the same mortality basis used by the reporting entity for the valuation of comparable annuity benefits issued to standard lives. If the reporting entity has no comparable annuity benefits for standard lives to be valued, the mortality basis shall be the table most recently approved by the state of domicile for valuing individual annuity benefits:					
	Attach statement of methods employed in their valuation.					
7.	Does the reporting entity have any Synthetic GIC contracts or agreements in effect as of December 31 of the current year?	. Yo	es []	No [X]	
	7.1 If yes, state the total dollar amount of assets covered by these contracts or agreements	·				
	7.2 Specify the basis (fair value, amortized cost, etc.) for determining the amount:					
	7.3 State the amount of reserves established for this business:					
	7.4 Identify where the reserves are reported in the blank:					

EXHIBIT 5A - CHANGES IN BASES OF VALUATION DURING THE YEAR

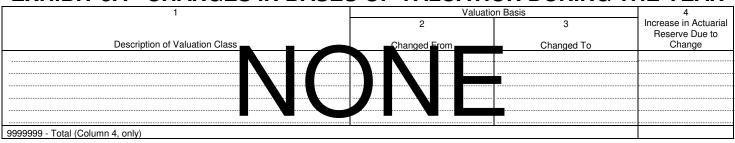


Exhibit 6 - Aggregate Reserves for Accident and Health Contracts $N\ O\ N\ E$

Exhibit 7 - Deposit-Type Contracts $N\ O\ N\ E$

EXHIBIT 8 - CLAIMS FOR LIFE AND ACCIDENT AND HEALTH CONTRACTS

PART 1 - Liability End of Current Year

		1	2		Ordinary		6				Accident and Health		
				3	4	5	0 1111111111111111111111111111111111111	7	8	9	10	11	
		Total	Industrial Life	Life Insurance	Individual Annuities	Supplementary Contracts	Credit Life (Group and Individual)	Life Insurance	Annuities	Group	Credit (Group and Individual)	Other	
. Due and unpaid:				Ello illogranoo	III al vidual 7 ii ii alii oo	Contracto		Life indurance	7 111101000	Стоир	marviadary	Othor	
. Dao ana ampaia.	1.1 Direct												
	1.2 Reinsurance assumed												
	1.3 Reinsurance ceded												
	1.4 Net												
. In course of settlement:	1.4 Net				-								
2.1 Resisted	2.11 Direct												
2.1 Hesisted	2.12 Reinsurance assumed												
	2.13 Reinsurance ceded												
	2.14 Net			(b)	(b)		(b)	(b)					
2.2 Other	2.21 Direct												
	2.22 Reinsurance assumed												
	2.23 Reinsurance ceded												
	2.24 Net			(b)	(b)		(b)	(b)		(b)	(b)	(b)	
. Incurred but unreported:				(-)			(5)	(-)		(-)	(=)	(-)	
	3.1 Direct	2.000		2.000	,								
	3.2 Reinsurance assumed	,		,									
	3.3 Reinsurance ceded												
	3.4 Net	2,000		(b)2,000	(b)			(b)			(b)	(b)	
TOTALS	4.1 Direct	2,000		2,000									
	4.2 Reinsurance assumed												
	4.3 Reinsurance ceded												
	4.4 Net	2,000	(a)	(a) 2,000				(a)					

....., credit Life (Group and Individual) \$, and Group Life \$, are included in Page 3, Line 1, (See Exhibit 5, Section on Disability Disabled Lives); and for Group Accident and Health \$

Credit (Group and Individual) Accident and Health \$, and Other Accident and Health \$ are included in Page 3, Line 2 (See Exhibit 6, Claim Reserve).

EXHIBIT 8 - CLAIMS FOR LIFE AND ACCIDENT AND HEALTH CONTRACTS

				T		2 - Incurred During				I	A :1		
		1	2		Ordinary	_	6	Gro 7			Accident and Health		
			Industrial Life	3 Life Insurance	4	5 Supplementary	Credit Life (Group	Life Insurance	8	9	10 Credit (Group	11	
		Total	(a)	(b)	Individual Annuities	Contracts	and Individual)	(c)	Annuities	Group	and Individual)	Other	
 Settler 	ments During the Year:												
1.1 Dir		213,376		213,376									
-	einsurance assumed												
1.3 Re	einsurance ceded												
1.4 Ne	et	(d)213,376		213,376									
Liabilit year f	ty December 31, current from Part 1:												
2.1 Dir	irect	2,000		2,000									
2.2 Re	einsurance assumed												
2.3 Re	einsurance ceded												
2.4 Ne	et	2,000		2,000									
reinsi	ints recoverable from surers December 31, current												
•	ty December 31, prior year:												
4.1 Dir		2.000		2.000									
4.2 Re	einsurance assumed	,		,									
4.3 Re	einsurance ceded												
4.4 Ne	et	2,000		2,000									
	ints recoverable from surers December 31, prior	,		,									
6. Incurre	ed Benefits							·					
6.1 Dir	irect	213,376		213,376									
6.2 Re	einsurance assumed												
6.3 Re	einsurance ceded												
6.4 Ne	et	213,376		213,376									

\$...... in Line 6.1, and \$..... in Line 6.4.

..... in Line 1.1, \$ in Line 1.4.

(b) Including matured endowments (but not guaranteed annual pure endowments) amounting to \$

(c) Including matured endowments (but not guaranteed annual pure endowments) amounting to \$

..... in Line 1.1, \$ in Line 1.4. \$...... in Line 6.1, and \$ in Line 6.4.

\$...... in Line 6.1, and \$ in Line 6.4.

EXHIBIT OF NON-ADMITTED ASSETS

	EXHIBIT OF HOR-ADMITTE	1 1		
		1 Current Year Total Nonadmitted Assets	2 Prior Year Total Nonadmitted Assets	3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1.	Bonds (Schedule D)			
	Stocks (Schedule D):			
	2.1 Preferred stocks			
	2.2 Common stocks			
3.	Mortgage loans on real estate (Schedule B):			
	3.1 First liens			
	3.2 Other than first liens			
4.	Real estate (Schedule A):			
	4.1 Properties occupied by the company			
	4.2 Properties held for the production of income			
	4.3 Properties held for sale			
5.	Cash (Schedule E - Part 1), cash equivalents (Schedule E - Part 2) and short-term investments (Schedule DA)			
6.	Contract loans			
7.	Derivatives			
8.	Other invested assets (Schedule BA)			
9.	Receivables for securities			
10.	Securities lending reinvested collateral assets			
11.	Aggregate write-ins for invested assets			
12.	Subtotals, cash and invested assets (Lines 1 to 11)			
13.	Title plants (for Title insurers only)			
14.	Investment income due and accrued			
15.	Premiums and considerations:			
	15.1 Uncollected premiums and agents' balances in the course of collection			
	15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due			
	15.3 Accrued retrospective premiums			
16.	Reinsurance:			
	16.1 Amounts recoverable from reinsurers			
	16.2 Funds held by or deposited with reinsured companies			
	16.3 Other amounts receivable under reinsurance contracts			
17.	Amounts receivable relating to uninsured plans			
18.1	Current federal and foreign income tax recoverable and interest thereon			
18.2	Net deferred tax asset	633,956	650,406	16,450
19.	Guaranty funds receivable or on deposit			
20.	Electronic data processing equipment and software			
21.	Furniture and equipment, including health care delivery assets			
22.	Net adjustment in assets and liabilities due to foreign exchange rates			
23.	Receivables from parent, subsidiaries and affiliates			
24.	Health care and other amounts receivable			
25.	Aggregate write-ins for other than invested assets	50		(50)
26.	Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	634,006	650,406	16,400
27.	From Separate Accounts, Segregated Accounts and Protected Cell Accounts			
28.	Total (Lines 26 and 27)	634,006	650,406	16,400
	DETAILS OF WRITE-INS			
1101.				
1102.				
1103.				
1198.	Summary of remaining write-ins for Line 11 from overflow page			
1199.	Totals (Lines 1101 thru 1103 plus 1198)(Line 11 above)			
2501.	Other Assets	50		(50)
2502.				
2503.				
2598.	Summary of remaining write-ins for Line 25 from overflow page			
2599.	Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	50		(50)

1. Summary of Significant Accounting Policies

A. Accounting Practices

The accompanying financial statements of Symetra National Life Insurance Company of (the Company) have been prepared in conformity with the National Association of Insurance Commissioners (NAIC) Accounting Practices and Procedures Manual and Annual Statement Instructions, except to the extent that practices prescribed or permitted by the Office of the Insurance Commissioner of the State of Washington (the Department) differ. No differences exist in the prescribed or permitted practices that result in a material effect on surplus as of December 31, 2010 or 2009.

Under Washington State Insurance code RCW 48.13.240(3), a mutual fund is classified as a miscellaneous investment and investment in a single entity's mutual fund is limited to no more than 1% of an insurer's admitted assets. The Company, with the explicit permission of the Department, is permitted to invest up to 4% of its assets in a single entity's mutual funds, as well as an unlimited amount of its assets in mutual funds listed on the NAIC's most recent Mutual Fund Lists as U.S. Direct Obligations/Full Faith and Credit Exempt. As of December 31, 2010 and 2009, the Company held \$226,797 or 1.3% and \$369,696 or 2.2%, respectively, of admitted assets in a single entity's mutual fund. The Company has no other permitted practices.

B. Use of Estimates in the Preparation of the Financial Statements

The preparation of financial statements in conformity with statutory accounting principles (SAP) requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Such estimates and assumptions could change in the future as more information becomes available, which could impact the amounts reported and disclosed herein.

C. Accounting Policy

Premiums are recognized annually on the policy anniversary for individual traditional life policies, consistent with the statutory reserving process. Premiums for universal life policies are recognized when received.

In addition, the Company uses the following accounting policies:

- (1) Short-term investments are stated at amortized cost.
- (2) Bonds, excluding loan-backed and structured securities are stated at amortized cost using the scientific method, except for those with an NAIC designation of 6, which are reported at lower of amortized cost or fair value.
- (3) The Company does not currently invest in common stocks.
- (4) Redeemable preferred stocks which have characteristics of debt securities and are rated as medium quality or better (NAIC designations 1 to 3) are reported at cost or amortized cost. All other redeemable preferred stocks (NAIC designations 4 to 6) are reported at the lower of cost, amortized cost or fair value.
- (5) The Company does not currently invest in mortgage loans.
- (6) Loan-backed bonds and structured securities are valued and reported in accordance with the Purposes and Procedures Manual of the NAIC Securities Valuation Office (SVO) and Statement of Statutory Accounting Principles (SSAP) No. 43-Revised, Loan-backed and Structured Securities. Loan-backed and structured securities, subject to a single NAIC designation and for which the collection of all contractual cash flows is probable, are reported at amortized cost using the retrospective methodology consistently applied by type of security, except for those with an NAIC designation of 6, which are reported at the lower of amortized cost or fair value. The retrospective methodology changes both the yield and the asset balance so that the expected future cash flows produce a return on the investment equal to the return now expected over the life of the investment as measured from the date of acquisition. NAIC designations for non-agency residential mortgage-backed and commercial mortgage-backed securities are based on security level expected losses as modeled by independent third parties engaged by the NAIC and the Company's statutory carrying value of the security rather than being based on the rating of a third party rating agency.
- (7) The Company has no investments in subsidiaries, controlled or affiliated companies.
- (8) The Company has no ownership interests in joint ventures, partnerships or limited liability companies.
- (9) The Company does not currently invest in derivatives.
- (10) The Company does not use anticipated investment income as a factor in the premium deficiency calculation.
- (11) The Company has no accident or health contracts.
- (12) The Company has not materially modified its capitalization policy from prior year.
- (13) The Company has no pharmaceutical rebate receivables.

2. Accounting Changes and Correction of Errors

The Company adopted SSAP No. 100, *Fair Value Measurements*, as of December 31, 2010. This SSAP defines fair value, establishes a framework for measuring fair value and establishes fair value disclosure requirements. The adoption did not have an impact on the Company's assets, liabilities, income or surplus but did require additional disclosures. See Note 20.

The Company adopted SSAP No. 43R, Loan-backed and Structured Securities (SSAP No. 43R) as of September 30, 2009. This SSAP substantively revises SSAP No. 43 and supersedes SSAP No. 98, Treatment of Cash Flows When Quantifying Changes in Valuations and Impairments and paragraph 13 of SSAP No. 99, Accounting for Certain Securities Subsequent to an Other-Than-Temporary Impairment. This SSAP revises valuation and impairment requirements to be based on the present value of cash flows expected to be collected for securities in which the Company has the intent and ability to hold, but does not expect to recover the entire amortized cost basis, and requires impaired securities that the Company intends to sell to be recorded at fair value. There was no cumulative effect on adoption of SSAP No. 43R.

The Company adopted SSAP No. 10R, *Income Taxes*, as of December 31, 2009. This SSAP substantively revises SSAP No. 10 *Income Taxes*, to allow the admission of adjusted gross deferred tax assets (DTAs) expected to be realized within three years of the balance sheet date, an increase from the prior recovery period of one year. In addition, SSAP No. 10R increased the limit for admissibility from the prior 10% of adjusted capital and surplus to 15% for qualifying companies. Upon adoption of SSAP No. 10R, the Company recorded an adjustment of \$35,126 as an increase to aggregate write-ins for gains and losses in surplus. See Note 9A.

There were no errors discovered during the years ended December 31, 2010 and 2009.

3. Business Combinations and Goodwill

Not applicable

. Discontinued Operations

Not applicable

5. Investments

A. Mortgage Loans

The Company has no investments in mortgage loans.

B. Debt Restructuring

The Company has no restructured debt in which the Company is a creditor.

C. Reverse Mortgages

The Company has no investments in reverse mortgages.

- D. Loan-Backed Securities
 - (1) Prepayment assumptions for single and multi-class mortgage-backed securities are obtained primarily from broker dealer survey values or internal estimates when survey values are not available.
 - (2) Other-than- temporary impairments (OTTI) for loan-backed securities None
 - (3) Loan-backed securities with prior OTTIs currently held by the Company as the present value of cash flows expected to be collected None
 - (4) All impaired securities (fair value is less than cost or amortized cost) for which an OTTI has not been recognized in earnings as a realized loss (including securities with a recognized OTTI for non-interest related declines when a non-recognized interest related impairment remains):
 - a. The aggregate amount of unrealized losses:

1. Less than 12 months \$ (109,290) 2. 12 months or longer \$ (626)

b. The aggregate related fair value of securities

with unrealized losses:

 1. Less than 12 months
 \$ 2,051,017

 2. 12 Months or longer
 \$ 183,659

(5) The Company's review of loan-backed securities for OTTI includes both quantitative and qualitative criteria. Quantitative criteria include the length of time and amount that each security is in an unrealized loss position (i.e., is underwater) and whether expected future cash flows indicate a credit loss exists.

While all securities are monitored for impairment, the Company's experience indicates that securities for which the cost or amortized cost exceeds fair value by less than 20% do not represent a significant risk of impairment and, often, fair values recover over time as the factors that caused the declines improve. If the estimated fair value has declined and remained below cost or amortized cost by 20% or more, the Company further analyzes the decrease in fair value to determine whether it is an other-than-temporary decline. To make this determination for each security, the Company considers, among other factors:

- Extent and duration of the decline in fair value below cost or amortized cost;
- The financial condition and near-term prospects of the issuer of the security, including any specific events that may affect its operations, earnings potential or compliance with terms and covenants of the security;
- Changes in the financial condition of the security's underlying collateral;
- Any downgrades of the security by a rating agency;
- Any reduction or elimination of dividends or nonpayment of scheduled interest payments;
- Other indications that a credit loss has occurred; and
- The Company's intent to sell or whether the Company has the intent and ability to retain the investment for a period of time sufficient to recover the amortized cost basis.
- E. Repurchase Agreements and/or Securities Lending Transactions.

The Company has no investments in repurchase agreements or securities lending transactions as of December 31, 2010 or 2009.

F. Real Estate

The Company has no investments in real estate.

G. Investments in Low-Income Housing Tax Credits (LIHTC)

The Company has no investments in LIHTC.

6. Joint Ventures, Partnerships and Limited Liability Companies

- A. The Company has no investments in joint ventures, partnerships or limited liability companies that exceed 10% of its admitted assets.
- B. The Company did not recognize any impairment write-down for investments in joint ventures, partnerships or limited liability companies for the years ended December 31, 2010 and 2009.

7. Investment Income

A. Due and accrued income is excluded from surplus on the following basis:

All investment income due and accrued on bonds in or near default, and other amounts that are over 90 days past due.

B. There was no investment income due and accrued excluded from surplus as of December 31, 2010 or 2009.

8. Derivative Instruments

The Company has no investments in derivative instruments.

9. Income Taxes

A. The components of the net deferred tax asset (DTA)/deferred tax liability (DTL) as of December 31 are as follows:

1. Total DTAs and DTLs by tax characte	r
--	---

(a) Gross DTAs	
(b) Statutory valuation allowance adjustment	
(c) Adjusted gross DTAs (1a+1b)	
(d) DTLs	
(e) Subtotal (net DTAs)	
(f) DTAs nonadmitted	
(g) Net admitted DTA (1e+1f)	

<u>12/31/2010</u>										
<u>(1)</u>		<u>(2)</u>		<u>(3)</u>						
			(Col 1+2)							
Ordinary		<u>Capital</u>		<u>Total</u>						
\$ 755,236	\$	-	\$	755,236						
 -		-		-						
755,236		-		755,236						
 (58,666)		-		(58,666)						
696,570		-		696,570						
 (633,956)		-		(633,956)						
\$ 62,614	\$	-	\$	62,614						

			12/31/2009			
<u>(4</u>	<u>1)</u>		(5)			<u>(6)</u>
_	-		-			-
=	-		=			(Col 4+5)
Ordin	nary		Capital			<u>Total</u>
\$	778,832	\$	-		\$	778,832
	-					-
	778,832		-			778,832
	(61,084)		-			(61,084)
	717,748		-			717,748
	(650,406)		-			(650,406)
\$	67,342	\$	-		\$	67,342
			<u>Change</u>			
<u>(7</u>	<u>7)</u>		<u>(8)</u>			<u>(9)</u>
=	=		=			-
(Col	1-4)		(Col 2-5)			(Col 7+8)
Ordin	<u>nary</u>		Capital			<u>Total</u>
\$	(23,596)	\$	-		\$	(23,596)
	-		-			-
	(23,596)		-			(23,596)
	2,418		-			2,418
	(21,178)		-			(21,178)
	16,450		-			16,450
\$	(4,728)	\$	-		\$	(4,728)
	\$ COLUMN (Column Column Colum	778,832 (61,084) 717,748 (650,406) \$ 67,342 (7) (Col 1-4) Ordinary \$ (23,596) 2,418 (21,178) 16,450	(4)	Ordinary Capital \$ 778,832 \$ - 778,832 - (61,084) - 717,748 - (650,406) - \$ 67,342 \$ - (Col 1-4) (Col 2-5) Ordinary Capital \$ (23,596) \$ - 2,418 - (21,178) - 16,450 -	(4) (5)	(4) (5)

The calculations above to determine adjusted gross DTAs and net admitted DTAs have not been impacted by taxplanning strategies.

2. SSAP No. 10R Election

The Company has elected to admit DTAs pursuant to paragraph 10.e. of SSAP No 10R. The Company also made this election for the year ended December 31, 2009.

3. Increased admitted amount under paragraph 10.e.

Increased amount of admitted assets - Ordinary Increased amount of admitted assets - Capital Total increased amount of admitted assets

(i) Additional amount admitted under paragraph 10.e.

<u>12</u>	2/31/2010	12/31/2009	<u>Change</u>
\$	33,222	\$ 35,126	\$ (1,904)
	-	-	-
\$	33,222	\$ 35,126	\$ (1,904)

33,222

4. Summary of admitted adjusted gross DTAs 12/31/2010 (3) (1) (2) (Col 1+2) Ordinary Capital **Total** Admission calculation components - SSAP No. 10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. 29,392 29,392 \$ (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. 58,666 (d) Total admitted under paragraph 10.a. through 10.c. 88,058 \$ 88,058 Admission calculation components - SSAP No. 10R, par. 10.e. (e) Amount admitted under paragraph10.e.i. 62,614 62,614 (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. 58,666 58,666 (h) Total admitted under paragraph 10.e. 121,280 121,280

33,222

				12/21/2000		
		(4)		12/31/2009		
		<u>(4)</u>		<u>(5)</u>		<u>(6)</u>
		0-4:		Cit-1		(Col 4+5)
Admission calculation components - SSAP No.		Ordinary	<u> </u>	<u>Capital</u>	1	<u>Total</u>
10R, par. 10.a., 10.b., and 10.c.						
(a) Amount admitted under paragraph 10.a.	\$	32,216	\$	_	\$	32,216
(b) Amount admitted under paragraph 10.b.i.	Ť	-	-	-	Ť	-
(c) Amount admitted under paragraph 10.c.		61,084		-		61,084
(d) Total admitted under paragraph 10.a. through 10.c.	\$	93,300	\$	-	\$	93,300
		,	•		•	-
Admission calculation components - SSAP No. 10R, par. 10.e.						
(e) Amount admitted under paragraph 10.e.i.	\$	67,342	\$	-	\$	67,342
(f) Amount admitted under paragraph 10.e.ii.a.		-		-		-
(g) Amount admitted under paragraph 10.e.iii.		61,084		-		61,084
(h) Total admitted under paragraph 10.e.	\$	128,426	\$	-	\$	128,426
(i) Additional amount admitted under paragraph 10.e.	\$	35,126	\$	-	\$	35,126
			1	<u>Change</u>	1	
		<u>(7)</u>		<u>(8)</u>		<u>(9)</u>
		(Col 1-4)		(Col 2-5)		(Col 7+8)
		Ordinary		<u>Capital</u>		Total
		<u>oraniarj</u>		Сарітаі	1	<u> 10tui</u>
Admission calculation components - SSAP No.		<u>orumary</u>	1	Саркаг	1	10111
10R, par. 10.a., 10.b., and 10.c.				Сарка		
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a.	\$	(2,824)	\$	<u>-</u>	\$	(2,824)
10R, par. 10.a., 10.b., and 10.c.(a) Amount admitted under paragraph 10.a.(b) Amount admitted under paragraph 10.b.i.		(2,824)	\$	<u>-</u> -	\$	(2,824)
 10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. 	\$	(2,824) - (2,418)		- - -		(2,824)
10R, par. 10.a., 10.b., and 10.c.(a) Amount admitted under paragraph 10.a.(b) Amount admitted under paragraph 10.b.i.		(2,824)	\$	<u>-</u>	\$	(2,824)
 10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. 	\$	(2,824) - (2,418)		- - - -		(2,824)
 10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. 	\$	(2,824) - (2,418) (5,242)	\$	- - - -	\$	(2,824) - (2,418) (5,242)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i.	\$	(2,824) - (2,418)				(2,824)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a.	\$	(2,824) - (2,418) (5,242) (4,728)	\$		\$	(2,824) - (2,418) (5,242) (4,728)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii.	\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418)	\$		\$	(2,824) - (2,418) (5,242) (4,728) - (2,418)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a.	\$	(2,824) - (2,418) (5,242) (4,728)	\$		\$	(2,824) - (2,418) (5,242) (4,728)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e.	\$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii.	\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418)	\$		\$	(2,824) - (2,418) (5,242) (4,728) - (2,418)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e.	\$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e. (i) Additional amount admitted under paragraph 10.e.	\$ \$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146) (1,904)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e. (i) Additional amount admitted under paragraph 10.e.	\$ \$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146) (1,904)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e. (i) Additional amount admitted under paragraph 10.e.	\$ \$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146) (1,904)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e. (i) Additional amount admitted under paragraph 10.e. Ten percent of statutory surplus under paragraph 10.b.ii. Fifteen percent of statutory surplus under par. 10.e.ii.b.	\$ \$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146) (1,904)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e. (i) Additional amount admitted under paragraph 10.e. Ten percent of statutory surplus under paragraph 10.b.ii. Fifteen percent of statutory surplus under par. 10.e.ii.b. Risk based capital amount utilized in paragraph 10.d.	\$ \$ \$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146) (1,904) 1,056,275 1,584,412	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)
10R, par. 10.a., 10.b., and 10.c. (a) Amount admitted under paragraph 10.a. (b) Amount admitted under paragraph 10.b.i. (c) Amount admitted under paragraph 10.c. (d) Total admitted under paragraph 10.a. through 10.c. Admission calculation components - SSAP No. 10R, Par. 10.e. (e) Amount admitted under paragraph 10.e.i. (f) Amount admitted under paragraph 10.e.ii.a. (g) Amount admitted under paragraph 10.e.iii. (h) Total admitted under paragraph 10.e. (i) Additional amount admitted under paragraph 10.e. Ten percent of statutory surplus under paragraph 10.b.ii. Fifteen percent of statutory surplus under par. 10.e.ii.b.	\$ \$ \$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146) (1,904)	\$		\$ \$	(2,824) - (2,418) (5,242) (4,728) - (2,418) (7,146)

 $5.\ Increased\ amount\ of\ admitted\ DTAs,\ admitted\ assets,\ statutory\ surplus\ and\ total\ adjusted\ capital:$

	<u>12/31/2010</u>					
		<u>(1)</u>		<u>(2)</u>		<u>(3)</u>
	_		_			(Col 2-1)
	SSAP 10R		SSAP 10R			Increased
	Par	. 10.a10.c.		Par. 10.e.		Amount
Admitted DTAs	\$	88,058	\$	121,280	\$	33,222
Admitted assets	\$	17,085,504	\$	17,118,726	\$	33,222
Statutory surplus	\$	10,717,916	\$	10,751,138	\$	33,222
Total adjusted capital	\$	10,766,114	\$	10,799,336	\$	33,222

	<u>12/31/2009</u>					
	<u>(4)</u>			<u>(5)</u>		<u>(6)</u>
	_		_			(Col 5-4)
	SSAP 10R		SSAP 10R			Increased
	Par	r. 10.a10.c.	Par. 10.e.		Amount	
Admitted DTAs	\$	93,300	\$	128,426	\$	35,126
Admitted assets	\$	16,748,988	\$	16,784,114	\$	35,126
Statutory surplus	\$	10,208,460	\$	10,243,586	\$	35,126
Total adjusted capital	\$	10,258,951	\$	10,294,077	\$	35,126

	Change					
		<u>(7)</u>		<u>(8)</u>		<u>(9)</u>
	(Col 1-4)		(Col 2-5)			(Col 8-7)
	SSAP No. 10R		SSAP No. 10R			Increased
	Par.	10.a10.c.	I	Par. 10.e.		Amount
Admitted DTAs	\$	(5,242)	\$	(7,146)	\$	(1,904)
Admitted assets	\$	336,516	\$	334,612	\$	(1,904)
Statutory surplus	\$	509,456	\$	507,552	\$	(1,904)
Total adjusted capital	\$	507,163	\$	505,259	\$	(1,904)

B. DTLs are not recognized for the following amounts:

The Company has no DTLs which have not been recognized.

C. Components of income taxes incurred:

		(1)	(2)	(3) (Col 1-2)
	<u>1</u> 2	2/31/2010	12/31/2009	<u>Change</u>
Current income taxes:				
Current year tax provision before tax credits	\$	227,561	\$ 175,125	\$ 52,436
Prior year under accrual		4,722	4,722	0
Income tax expense from operations		232,283	179,847	52,436
Taxes on capital gains		10,440	1,647	8,793
Current income taxes incurred		242,723	\$ 181,494	\$ 61,229
		(1)	(2)	(3)
				(Col 1-2)
	<u>1</u> 2	2/31/2010	12/31/2009	<u>Change</u>
The main components of deferred tax amounts are as follows:				
Assets:				
Investments	\$	1,960	\$ 2,389	\$ (429)
Non-admitted assets		18	-	18
Proxy deferred acquisition costs		39,826	42,036	(2,210)
Reserves		712,891	733,496	(20,605)
All others	-	541	911	(370)
Total DTAs	\$	755,236	\$ 778,832	\$ (23,596)
Total DTAs – nonadmitted		633,956	650,406	(16,450)
Liabilities:				
Investments		36,055	36,842	(787)
Deferred premium/loading		22,611	24,242	(1,631)
Total DTLs	\$	58,666	\$ 61,084	\$ (2,418)
Change in net deferred income tax				\$ (21,178)
Surplus Adjustments:				
Tax effect of change in nonadmitted assets				(18)
Adjustments to prior year net DTAs				 (4,722)
Adjusted change in net deferred income tax				\$ (25,918)

No adjustments were made to the Company's gross DTAs because of a change in circumstances. The Company expects it will fully realize the DTAs and no statutory valuation allowance has been recorded as of December 31, 2010.

D. Significant statutory to tax adjustments on current taxes:

	<u>1</u> 2	2/31/2010		12/31/2009
Ordinary income tax at federal statutory rate (35%)	\$	262,263	\$	147,662
Capital income tax at federal statutory rate (35%)		3,436		599
Total income tax		265,699		148,261
Permanent items and other adjustments		689		725
Change in interest maintenance reserve	(2,469)			(1,952)
Prior year adjustment		4,722		4,722
Federal income tax expense	\$	268,641	\$	151,756
Federal & foreign taxes incurred		242,723		181,494
Change in net deferred income taxes		25,918		(29,738)
Total statutory income tax expense	\$	268,641	\$	151,756
	-			

- E. (1) At December 31, 2010, the Company had no net operating or capital loss carryforward amounts.
 - (2) The amount of federal income taxes incurred that are available for recovery in the event of the carryback of future net losses is as follows:

	<u>2010</u>	<u>2009</u>	<u>2008</u>
Ordinary income	\$ 227,561	\$ 179,848	\$ 218,703
Capital gain	\$ 10,440	\$ -	\$ 436

- (3) The Company does not have any deposits admitted under Section 6603 of the Internal Revenue Code.
- F. (1) The Company's federal income tax return is consolidated within the Symetra Financial Corporation and Subsidiaries consolidated income tax return. Please refer to Schedule Y for a list of the entities within the consolidated group.
 - (2) The method of allocation between companies is subject to written agreement, approved by the Board of Directors. Allocation is based on separate return calculations, except that current credit for tax credits and net operating loss carryforwards are determined on the basis of the consolidated group. Intercompany tax balances are settled quarterly.
 - (3) The Company's federal income tax returns have been examined and closing agreements have been executed with the Internal Revenue Service, or the statute of limitations has expired for all tax periods through December 31, 2006.

10. Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

A. B. and C. The following transactions were entered into by the Company with affiliates. Non-insurance transactions involving less than .5% of the Company's admitted assets are omitted, with the exception of cost allocation transactions which are discussed separately.

There were no dividends paid for the year ended December 31, 2010.

There were no material related party transactions for the year ended December 31, 2010.

For the year ended December 31, 2009:

Date	Transaction Explanation	Insurer Name	Affiliate Name	Statement Value	Asset Received	Asset Transferred
December 24, 2009	Ordinary Dividend	Symetra Nat'l Life Ins. Co.	Symetra Life Insurance Co.	\$1,000,000		Cash

D. As of December 31, 2010 and 2009, the Company reported the following amounts due (to)/from an affiliated company, which are generally settled within 30 days:

December 31

Symetra Life Insurance Company White Mountains Advisors, LLC Total

 2010		2009
\$ (14,376)		\$ (20,232)
 (2,195)	_	(2,363)
\$ (16,571)		\$ (22,595)

E. The Company has not agreed to any guarantees for affiliates.

F. The Company has a Services and Shared Expenses Agreement with its affiliates under common ownership with Symetra Financial Corporation, whereby the parties each agree to provide and receive from each other certain general services (related to sharing common management, personnel and facilities) and to share expenses thereof. These expenses include charges for rent, corporate overhead, data processing systems, payroll, benefits, and other miscellaneous charges and are included in investment and general insurance expenses in the summary of operations.

The Company is party to an Investment Management Agreement with White Mountains Advisors, LLC a subsidiary of White Mountains Insurance Group, Ltd., an affiliate of Symetra Financial Corporation. This agreement, as amended, provides for investment advisory services related to the Company's invested assets and portfolio management services.

- G. All outstanding shares of the Company are owned by Symetra Life Insurance Company. All outstanding shares of Symetra Life Insurance Company are owned by Symetra Financial Corporation, an insurance holding company domiciled in the state of Delaware. This control does not significantly change the operating results or financial position of the Company compared to results that would have been obtained without the control.
- H. The Company owns no shares, either directly or indirectly, in the Parent or Symetra Financial Corporation.
- I. Investments in subsidiary, controlled or affiliated companies (SCA's) Not applicable
- J. Impairment write-down for investments in impaired SCA entities Not applicable
- K. Investments in foreign insurance subsidiaries Not applicable
- Investments in downstream noninsurance holding company Not applicable

11. Debt

Not applicable

12. Retirement Plans, Deferred Compensation, Post Employment Benefits and Compensated Absences and Other Postretirement Plans

- A. The Company does not sponsor a defined benefit plan.
- B. The Company does not administer the defined contribution plan. See Note 12D.
- C. The Company does not participate in a multi-employer plan.
- D. Consolidated Holding Company Plans

Retirement Plans

The Company participates in a defined contribution plan sponsored by Symetra Life Insurance Company, its parent, for all eligible employees.

The plan includes a matching contribution of 100% of a participant's contributions, up to 6% of eligible compensation. The Company's share of expenses for the plan was not material for the years ended December 31, 2010 and 2009.

- E. The Company does not participate in a cash balance, post employment benefit or deferred compensation plan.
- F. There is no impact from the Medicare Modernization Act since the Company does not participate in postretirement benefit plans.

13. Capital and Surplus, Shareholder's Dividend Restrictions and Quasi-Reorganizations

- (1) The Company's capital is common stock, 20,000 shares authorized, issued and outstanding, \$125 per share par value. There are no other classes of capital stock.
- (2) The Company has no preferred stock.
- (3) The Company is restricted as to the amount of dividends that can be paid to its shareholder without prior approval of the Department. This restriction is the greater of statutory net gain from operations for the previous year or 10% of total capital and surplus at the close of the previous year, subject to a maximum limit equal to statutory unassigned funds. Based on this restriction, the maximum dividend payout that may be made without prior approval in 2011 is \$1,075,114.
- (4) The Company paid dividends of \$0 and \$1,000,000 for the years ended December 31, 2010 and 2009, respectively. A dividend schedule is provided in Note 10.
- (5) Within the limitations of (3) above, there are no restrictions placed on the portion of Company profits that may be paid as ordinary dividends to its shareholder.
- (6) The unassigned surplus funds are held for the benefit of the Company's shareholder, as the Company does not issue participating business.
- (7) There have been no advances to surplus.
- (8) The Company holds no stock for special purposes.

- (9) The decrease in aggregate write-ins for special surplus funds of \$1,904 is due to a decrease in the amount of the net deferred tax asset admitted under SSAP No. 10R paragraph 10.e. for the year ended December 31, 2010. See Note 9 Income Taxes for more information.
- (10) There was no increase (decrease) of unassigned funds (surplus) due to cumulative unrealized gains or losses as of December 31, 2010 or 2009.
- (11) The Company has no surplus notes.
- (12) Impact of any restatement due to quasi-reorganizations Not applicable
- (13) Effective date of quasi-reorganizations Not applicable

14. Contingencies

- A. The Company has made no commitments or contingent commitments to a SCA entity.
- B. Under state insolvency and guaranty laws, insurers licensed to do business in a state can be assessed or required to contribute to state guaranty funds to cover policyholder losses resulting from insurer insolvencies. Liabilities for guaranty funds are not discounted or recorded net of premium tax offsets and are included in other liabilities in the balance sheets. As of December 31, 2010, the Company had liabilities of \$9,783 for estimated guaranty fund assessments. The Company has a related asset for premium tax offsets of \$8,233. As of December 31, 2009, the Company had liabilities for estimated guaranty fund assessments, of \$10,078 with a related asset for premium tax offsets of \$7,472. Premium tax offsets are available for a period of five to twenty years.
- C. The Company has no material gain contingencies to report. See Note 14E.
- D. Claims related extra contractual obligation and bad faith losses stemming from lawsuits Not applicable
- E. Because of the nature of the business, the Company is subject to legal actions filed or threatened in the ordinary course of its business operations. The Company does not expect that any such litigation, pending or threatened as of December 31, 2010, will have a material adverse effect on its financial condition, future operating results, or liquidity.

15. Leases

Not applicable

16. Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk.

Not applicable

17. Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

A. Transfers of Receivables Reported as Sales

The Company has no transfers of receivables recorded as sales.

- B. Transfer and Servicing of Financial Assets Not applicable
- C. Wash Sales

The Company had no transactions which met the definition of wash sales as stated in SSAP No. 91, *Accounting for Transfers and Servicing of Financial Assets and Extinguishments of Liabilities*, for securities with a NAIC designation of 3 or below or unrated securities for the year ended December 31, 2010.

18. Gain or Loss to the Reporting Entity from Uninsured A & H Plans and the Uninsured Portion of Partially Insured Plan

Not applicable

19. Direct Premium Written/Produced by Managing General Agents/Third Party Administrators

Not applicable

20. Fair Value Measurements

The Company had no assets measured and reported at fair value for the years ended December 31, 2010 and 2009.

21. Other Disclosures

- A. Extraordinary Items Not applicable
- B. Troubled Debt Restructuring: Debtors Not applicable

C. Other Disclosures

The book/adjusted carrying values of certain bonds on deposit with state regulatory authorities was \$2,370,743 and \$2,368,373 as of December 31, 2010 and 2009, respectively.

- D. The Company does not carry any significant uncollected premium balances that are considered uncollectible.
- E. Business Interruption Insurance Recoveries Not applicable
- F. State Transferable Tax Credits Not applicable
- G. Subprime-Mortgage-Related Risk Exposure
 - (1) In order to determine our subprime exposure, we included all securities issued from a dedicated subprime shelf. We have no securities with a subprime exposure.
 - (2) Direct exposure through investments in subprime mortgage loans None
 - (3) Direct exposure through other investments None
 - (4) Underwriting exposure to subprime mortgage risk through mortgage guaranty or financial guaranty insurance coverage Not applicable
- H. Retained Assets Not applicable

22. Events Subsequent

Type I: Recognized Subsequent Events:

The Company has not experienced any events that provide additional evidence with respect to conditions that existed at the date of the balance sheet and affect the estimates inherent in the process of preparing the financial statements.

Type II: Nonrecognized Subsequent Events:

The Company has not experienced any events that provide additional evidence with respect to conditions that did not exist at the date of the balance sheet but arose subsequent to that date.

Subsequent events have been considered through February 24, 2011 for the statutory statement issued on February 24, 2011.

23. Reinsurance

Not applicable

24. Retrospectively Rated Contracts & Contracts Subject to Redetermination

Not applicable

25. Change in Incurred Losses and Loss Adjustment Expenses

Not applicable

26. Intercompany Pooling Arrangements

Not applicable

27. Structured Settlements

Not applicable

28. Health Care Receivables

Not applicable

29. Participating Policies

Not applicable

30. Premium Deficiency reserves

Not applicable

31. Reserves for Life Contracts and Annuity Contracts

- (1) The Company waives deduction of deferred fractional premium upon death of life policy insureds and returns any premium beyond the date of death. Surrender values on policies do not exceed the corresponding benefit reserves.
- (2) For substandard lives, either extra premium is charged, or the gross premium for a rated age is charged. Mean reserves are determined by computing the regular mean reserve for the plan at any rated age and, in addition, holding one-half of any extra premium charge for the year.
- (3) As of December 31, 2010 and 2009, the Company had \$4,226,936 and \$4,772,077, respectively, of insurance in force for which the gross premiums are less than the net premiums according to the standard valuation set by the Department. Reserves to cover the difference as reported in exhibit 5, miscellaneous reserves section, were \$60,737 and \$67,488 as of December 31, 2010 and 2009, respectively, and were included in aggregate reserves.
- (4) The tabular interest has been determined by formula as described in the instructions for page 7.
- (5) Tabular interest on funds not involving life contingencies Not applicable
- (6) The Company had no significant other reserve changes for the years ended December 31, 2010 and 2009.

32. Analysis of Annuity Actuarial Reserves and Deposit-Type Liabilities by Withdrawal Characteristics

There are no annuity actuarial reserves or deposit-type liabilities.

33. Premium and Annuity Considerations Deferred and Uncollected

The deferred and uncollected life insurance premiums as of December 31, 2010 are as follows:

<u>Type</u>	Gross	Net of Loading
Ordinary – new business	\$ 0	\$ 0
Ordinary – renewal	64,603	49,785
Total	<u>\$ 64,603</u>	<u>\$ 49,785</u>

The deferred and uncollected life insurance premiums as of December 31, 2009 are as follows:

<u>Type</u>	Gross	Net of Loading
Ordinary – new business	\$ 0	\$ 0
Ordinary – renewal	69,262	54,100
Total	<u>\$ 69,262</u>	<u>\$ 54,100</u>

34. Separate Accounts

Not applicable

35. Loss/Claim Adjustment Expenses

Not applicable

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES GENERAL

1.1	1.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer?					
1.2	If yes, did the reporting entity register and file with its domiciliary State such regulatory official of the state of domicile of the principal insurer providing disclosure substantially similar to the standards adopted by its Model Insurance Holding Company System Regulatory Act and m subject to standards and disclosure requirements substantially similar	in the Holding Company System, a registration statement the National Association of Insurance Commissioners (NAIC) in	s[X] No[] N/A[]			
1.3	State Regulating?		Washington			
2.1	Has any change been made during the year of this statement in the charge reporting entity?	narter, by-laws, articles of incorporation, or deed of settlement of the	Yes [] No [X]			
2.2	If yes, date of change:					
3.1	State as of what date the latest financial examination of the reporting	entity was made or is being made	12/31/2010			
3.2	State the as of date that the latest financial examination report becamentity. This date should be the date of the examined balance sheet a	e available from either the state of domicile or the reporting nd not the date the report was completed or released	12/31/2005			
3.3	State as of what date the latest financial examination report became a domicile or the reporting entity. This is the release date or completion examination (balance sheet date).	available to other states or the public from either the state of a date of the examination report and not the date of the	02/27/2008			
3.4	By what department or departments? Washington					
3.5	Have all financial statement adjustments within the latest financial exastatement filed with Departments?	amination report been accounted for in a subsequent financial Ye	s [] No [] N/A [X]			
3.6	Have all of the recommendations within the latest financial examination	on report been complied with?	s [X] No [] N/A []			
4.1		loyees of the reporting entity), receive credit or commissions for or				
4.2	During the period covered by this statement, did any sales/service org receive credit or commissions for or control a substantial part (more premiums) of:	anization owned in whole or in part by the reporting entity or an affiliat				
		es of new business?ewals?				
5.1	Has the reporting entity been a party to a merger or consolidation duri	ng the period covered by this statement?	Yes [] No [X]			
5.2	If yes, provide the name of the entity, NAIC Company Code, and state ceased to exist as a result of the merger or consolidation.	e of domicile (use two letter state abbreviation) for any entity that has				
	1 Name of Entity	2 NAIC Company Code State of Domicile				
6.1	Has the reporting entity had any Certificates of Authority, licenses or revoked by any governmental entity during the reporting period?	egistrations (including corporate registration, if applicable) suspended				
6.2	If yes, give full information:					
7.1	Does any foreign (non-United States) person or entity directly or indire	ectly control 10% or more of the reporting entity?				
7.2	If yes, 7.21 State the percentage of foreign control;		14.7			
	7.21 State the percentage of foreign control, 7.22 State the nationality(s) of the foreign person(s) or entity(s) or if th attorney-in-fact; and identify the type of entity(s) (e.g., individual,	e entity is a mutual or reciprocal, the nationality of its manager or	14.7 %			
	1 Nationality	2 Type of Entity				
	Bermuda					

GENERAL INTERROGATORIES

8.1 8.2	Is the company a subsidiary of a bank holding company regulated by If response to 8.1 is yes, please identify the name of the bank holding					Yes [] [No [X	[]
8.3 8.4	Is the company affiliated with one or more banks, thrifts or securities If response to 8.3 is yes, please provide the names and locations (cit financial regulatory services agency [i.e. the Federal Reserve Board Thrift Supervision (OTS), the Federal Deposit Insurance Corporatio the affiliate's primary federal regulator.	ry and state of the main office) of any affiliates red (FRB), the Office of the Comptroller of the Cur	gulated by a	a federal	ce of	Yes [X] 1	No []
	1	2	3	4	5	6		7	
	Affiliate Name Symetra Investment Services, Inc.	Location (City, State)	FRB	OCC	OTS	FDIC	_	EC	
	Symetra Investment Services, Inc.	Bellevue, WA	NO	N0 N0	NO NO	NO NO		ES ES	
	oyiietta decurrites, mc.								
9. 10.1	What is the name and address of the independent certified public acc Ernst & Young LLP Suite 3500 999 Third Avenue Seattle, WA 98104 Has the insurer been granted any exemptions to the prohibited non-a	audit services provided by the certified independ	ent public a	ccountant					
10.2	requirements as allowed in Section 7H of the Annual Financial Replaw or regulation?					Yes [] 1	No [X	(]
10.3 10.4	Has the insurer been granted any exemptions to the audit committee Reporting Model Regulation, or substantially similar state law or reg If the response to 10.3 is yes, provide information related to this exer	julation?				Yes [] 1	No [X	[]
10.5	Has the insurer been granted any exemptions related to the other rec	quirements of the Annual Financial Reporting M	odel Regula	tion as					
10.6	allowed for in Section 17A of the Model Regulation, or substantially If the response to 10.5 is yes, provide information related to this exer	nption:				Yes [J L	NO [X	.]
10.7	Has the reporting entity established an Audit Committee in compliance	ce with the domiciliary state insurance laws?				1 No f	1	N/A [í 1
10.8	If the response to 10.7 is no or n/a, please explain	,			•] 140 [1	IVA [. 1
	firm) of the individual providing the statement of actuarial opinion/ce Dena Simone Thompson, FSA, MAAA Senior Actuary and Vice President Symetra Life Insurance Company 777 108th Avenue NE, Suite 1200 MS: SC-14 Bellevue, WA 98004								
12.1	Does the reporting entity own any securities of a real estate holding of 12.11 Name of real	company or otherwise hold real estate indirectly' I estate holding company	·			Yes [] N	No [X	[]
		arcels involved							
400		djusted carrying value			\$				
12.2	If, yes provide explanation:								
13.	FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTIT								
13.1	What changes have been made during the year in the United States	•							
13.2	Does this statement contain all business transacted for the reporting					Yes [1 1	No [1
13.3	Have there been any changes made to any of the trust indentures du	ring the year?				Yes [-	-	j
	If answer to (13.3) is yes, has the domiciliary or entry state approved $% \left(13.3\right) =10^{-3}$] No []	N/A [i]
14.1	Are the senior officers (principal executive officer, principal financial of similar functions) of the reporting entity subject to a code of ethics, (a) Honest and ethical conduct, including the ethical handling of acturelationships; (b) Full, fair, accurate, timely and understandable disclosure in the performance with applicable governmental laws, rules and regulations.	which includes the following standards?al or apparent conflicts of interest between pers	onal and pro			Yes [X] N	No []
	(d) The prompt internal reporting of violations to an appropriate person	ions;							
4.11	(d) The prompt internal reporting of violations to an appropriate personal (e) Accountability for adherence to the code. If the response to 14.1 is No, please explain:	ions; on or persons identified in the code; and							
	(d) The prompt internal reporting of violations to an appropriate perso. (e) Accountability for adherence to the code.	ions; on or persons identified in the code; and				Yes [] 1	No [X	:]
14.2	(d) The prompt internal reporting of violations to an appropriate personal (e) Accountability for adherence to the code. If the response to 14.1 is No, please explain:	ions; on or persons identified in the code; and entities and entities are code; and				Yes [] !	No [X	(]
14.2 4.21 14.3	(d) The prompt internal reporting of violations to an appropriate perso (e) Accountability for adherence to the code. If the response to 14.1 is No, please explain: Has the code of ethics for senior managers been amended? If the response to 14.2 is yes, provide information related to amendment.	ions; on or persons identified in the code; and ent(s).							

GENERAL INTERROGATORIES

BOARD OF DIRECTORS

15.	5. Is the purchase or sale of all investments of the reporting entity passed upon either by the board of directors or a subordinate committee thereof?					[]	
16.	Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof?					[]	
17.		erial interest or affiliation on the				[]	
	FINANCIAL						
18.	Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g Accounting Principles)?		Yes	[]	l No	[X]	
19.1	Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans): 19.11 To o						
	19.12 To s	tockholders not officers	\$				
	19.13 Trus	tees, supreme or grand					
		ternal Only)	\$				
19.2	Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of	lirectors or other officers	Φ				
		tockholders not officers	.\$				
	19.23 Irus (Fra	tees, supreme or grand ternal Only)	Φ.				
20.1		out the liability for such	Ψ				
_0	obligation being reported in the statement?		Yes	[]	No	[X]	
20.2		ted from others					
		owed from others					
		sed from others					
		er					
21.1	Does this statement include payments for assessments as described in the Annual Statement Instructions of guaranty association assessments?	er than guaranty fund or					
21.2		paid as losses or risk adjustment s					
		paid as expenses	\$			2,5	545
		mounts paid					
22.1	Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this state	ment?	Yes	[]	No	[X]	
22.2	If yes, indicate any amounts receivable from parent included in the Page 2 amount:						
	INVESTMENT						
23.1	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting the actual possession of the reporting entity on said date? (other than securities lending programs addressed		Yes	[X]] No)[]	
23.2	If no, give full and complete information relating thereto						
23.3	For security lending programs, provide a description of the program including value for collateral and amount	of loaned coourities, and					
20.0	whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 17 where this inform Reference notes	ation is also provided)					
23.4	Does the Company's security lending program meet the requirements for a conforming program as outlined in Instructions?] N	lo [] N	√A [)	(]
23.5	If answer to 23.4 is yes, report amount of collateral for conforming programs.		\$				
23.6	If answer to 23.4 is no, report amount of collateral for other programs.		\$				
23.7	Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from toutset of the contract?] N	lo [] N	√A [)	(]
23.8	Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%?	Yes [] N	lo [] N	√A [)	(]
23.9	Does the reporting entity or the reporting entity 's securities lending agent utilize the Master Securities lending conduct securities lending?] N	lo [] N	√A [)	(]

GENERAL INTERROGATORIES

24.1	24.1 Were any of the stocks, bonds or other assets of the reporting entity owned at Deceml control of the reporting entity, or has the reporting entity sold or transferred any asse force? (Exclude securities subject to Interrogatory 20.1 and 23.3).			assets sub	ets subject to a put option contract that is currently in			
24.2	If yes, state the amount thereo	of at December 31 of the	current year:	24.22	Subject to reverse re	se agreements epurchase agreementsurchase agreements	\$	
				24.24	Subject to reverse d	ollar repurchase agreements	\$	
						J		
						agreementssecurities restricted as to sale		
						e or other regulatory body		
				24.29	Other		\$	
24.3	For category (24.27) provide t	he following:						
	Natu	1 ire of Restriction			2 Description	1	3 Amount	
25.1	Does the reporting entity have	any hedging transactions	reported on Schedule D)B?			Yes [] No [X]	
25.2	If yes, has a comprehensive of the formatter of the second		program been made avai	ilable to the	domiciliary state?	Yes [] No [] N/A [X	
26.1	Were any preferred stocks or issuer, convertible into equity	bonds owned as of Dece	mber 31 of the current yea	ar mandato	rily convertible into e	equity, or, at the option of the	Yes [] No [X]	
26.2	If yes, state the amount thereo	of at December 31 of the	current year				\$	
27.	offices, vaults or safety depo custodial agreement with a c	sit boxes, were all stocks ualified bank or trust com	bonds and other securiti pany in accordance with	ies, owned Section 1, I	throughout the curre		Yes [X] No []	
27.01	For agreements that comply v	vith the requirements of th	e NAIC Financial Conditi	on Examine	ers Handbook, comp	elete the following:		
		1 ustodian(s)				2 's Address		
	Traine or o	uotoulari(o)	4 New York Plaza -		- Guotoula	57.taa.656		
	JP Morgan Chase		· ·	-2413				
27.02	For all agreements that do no and a complete explanation:	t comply with the requiren	nents of the NAIC Financi	ial Conditio	n Examiners Handbo	ook, provide the name, location		
	1 Name(s)	Loca	2 ation(s)		3 Complete Explanat	` '	
	Have there been any changes If yes, give full and complete i			ntified in 27.	<u>.</u>	t year?		
	1 Old Custodian	1	2 New Custodian		3 Date of Chang	e 4 Reaso	n	
27.05	Identify all investment advisor handle securities and have a	-,				ess to the investment accounts,		
	1		2			3		
	Central Registration Depository Number(s)		Name			Address		
	104123	White Mountains Advisor	s, LLC	G				
	138756	Pioneer Investment Mana	gement, Inc	Be	5 State Street			
	106595	Wellington Management C	ompany, LLP	B	oston, MA 02109			

GENERAL INTERROGATORIES

28.1		y have any diversified mutual funds reported in Schedule D, Part 2 (diversified according to the Securities and n (SEC) in the Investment Company Act of 1940 [Section 5(b)(1)])?	Yes [] No [Х	
28.2 If yes, complete the following schedule:						
	1	2	3		1	

1	2	3
		Book/Adjusted
CUSIP#	Name of Mutual Fund	Carrying Value
28.2999 - Total		0

28.3 For each mutual fund listed in the table above, complete the following schedule:

1	2	3	4
		Amount of Mutual	
		Fund's Book/Adjusted	
		Carrying Value	
	Name of Significant Holding of the	Attributable to the	Date of
Name of Mutual Fund (from above table)	Mutual Fund	Holding	Valuation

29. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

	1	2	3
			Excess of Statement over Fair Value (-), or
	Statement (Admitted)		Fair Value over
	Value	Fair Value	Statement (+)
29.1 Bonds	16,652,369	17,219,090	566,721
29.2 Preferred stocks	0	0	0
29.3 Totals	16,652,369	17,219,090	566,721

29.4 Describe the sources or methods utilized in determining the fair values:

The Company has elected to use the same pricing methodology and sources as utilized for obtaining GAAP fair values at which the security would sell in an arms length transaction between a willing buyer and seller in possession of the same information. The Company uses quoted market prices from independent third party pricing services or public market information to determine the fair value of its investments when such information is available. When such information is not available for investments, as in the case of securities that are not publicly traded, we determine fair value using other valuation techniques. Such techniques include evaluating discounted cash flows, identifying comparable securities with quoted market prices, and using internally prepared valuations based on certain modeling and pricing methods. ...

30.1	was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Schedule D?	Yes []	No	[X	L

- 30.3 If the answer to 30.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:

We utilize a nationally recognized independent third party pricing service for the majority of the prices used to determine fair value. We gain assurance on the overall reasonableness and consistent application of input assumptions, valuation methodologies and compliance with accounting standards for fair value determination through various processes including, but not limited to, evaluation of pricing methodologies, analytical reviews of certain prices and back-testing of selected sales activity to determine whether there are any significant differences between the market price used to value the security prior to sale and the actual sales prices.

1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Securities Valuation Office been followed?	Yes [X] No [
---	----------------

31.2 If no, list exceptions:

GENERAL INTERROGATORIES

OTHER

32.1	Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any?		\$	0
32.2	List the name of the organization and the amount paid if any such payment represented 25% or more of the to service organizations and statistical or rating bureaus during the period covered by this statement.	otal payments to trade a	associations,	
	1 Name	2 Amount Paid		
33.1	Amount of payments for legal expenses, if any?		\$	0
33.2	List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment during the period covered by this statement.	nents for legal expenses	S	
	1 Name	2 Amount Paid		
34.1	Amount of payments for expenditures in connection with matters before legislative bodies, officers or departm	ents of government, if a	any?\$	0
34.2	List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment connection with matters before legislative bodies, officers or departments of government during the period of		nt.	
	1 Name	2 Amount Paid		

GENERAL INTERROGATORIES

PART 2 - LIFE INTERROGATORIES

1.1	Does the reporting entity have any direct Medicare Supplement Insurance in force?] [No [X]
1.2	If yes, indicate premium earned on U.S. business only						
1.3		What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit? 1.31 Reason for excluding:					
1.4	Indica	Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above.					
1.5	Indica	dicate total incurred claims on all Medicare Supplement insurance.					
1.6	Indivi	dual policies:					
1.6	maivio	dual policies:	Most current three ye	ears: earned	¢		
				claims			
				ered lives			
			1.03 Number of cove	7160 IIV63			
			All years prior to mo	st current three years			
				earned	\$		
			·	claims			
				ered lives			
1.7	Group	policies:	Most current three ye	ears:			
			1.71 Total premium	earned	\$		
			1.72 Total incurred of	claims	\$		
			1.73 Number of cove	ered lives			
				st current three years			
			1.74 Total premium	earned	\$		
			1.75 Total incurred of	claims	\$		
			1.76 Number of cove	ered lives			
_		T .					
2.	Healtr	n Test:	1	2			
				Prior Year			
	2.1	Premium Numerator		0			
	2.2	Premium Denominator					
	2.3	Premium Ratio (2.1/2.2)	0.000	0.000			
	2.4	Reserve Numerator					
	2.5	Reserve Denominator					
	2.6	Reserve Ratio (2.4/2.5)	0.000	0.000			
0.4	D	ability and the state of the st			V .		
3.1	Does	this reporting entity have Separate Accounts?			Yes [] [No [X]
3.2	If yes	has a Separate Accounts Statement been filed with this Department?		Yes [] No []	N/A [X]
3.3	What distri	portion of capital and surplus funds of the reporting entity covered by assets in the butable from the Separate Accounts to the general account for use by the gener	ne Separate Accounts statement, al account?	is not currently	\$		
3.4	State	the authority under which Separate Accounts are maintained:					
0.5	141						N F V 3
3.5	was a	any of the reporting entity's Separate Accounts business reinsured as of Decemb	oer 31?		Yes [] [NO [X]
3.6	Has th	Has the reporting entity assumed by reinsurance any Separate Accounts business as of December 31?					No [X]
3.7	Acco	reporting entity has assumed Separate Accounts business, how much, if any, rei nunts reserve expense allowances is included as a negative amount in the liabilit?"	y for "Transfers to Separate Acco	unts due or accrued	e 		
4.1	by th	ersonnel or facilities of this reporting entity used by another entity or entities or ar is reporting entity (except for activities such as administration of jointly underwrit es)?	ten group contracts and joint mor	tality or morbidity	Yes [X	(] (No []
4.2	Net re	imbursement of such expenses between reporting entities:					
		minute contain of cook of portions southern reporting criticals.	4 21 Paid		\$		97 472
			4 22 Received		φs		
5.1	Does	the reporting entity write any guaranteed interest contracts?			Yes [] [No [X]
5.2							
	If yes,	what amount pertaining to these lines is included in:					
			5.21 Page 3, Line 1		\$		
•	F0-	OTOOK DEDODTING ENTITIES ONLY	5.22 Page 4, Line 1		\$		
6.	FOR S	STOCK REPORTING ENTITIES ONLY:					
6.1	Total	amount naid in by stockholders as surplus funds since organization of the report	ing entity:		\$		4 500 000
U. I	. Jiai	Total amount paid in by stockholders as surplus funds since organization of the reporting entity:					, , 000 , 000
7.	Total	dividends paid stockholders since organization of the reporting entity:					
			7.11 Cash		\$.18,585,835
			7.12 Stock		\$		

GENERAL INTERROGATORIES

8.1	Does the company Reinsurance (inclu- benefits of the oc- originally written	Yes [] No [X]							
8.2	If yes, has the rep	Yes [] No []							
8.3	If 8.1 is yes, the amounts of earned premiums and claims incurred in this statement are:									
					Reinsurance Assumed	Reinsurance Ceded	Net Retained			
	•									
			•							
	0.00 Incurred cia									
8.4	If reinsurance ass 8.34 for Column	ıd								
			Attachment			1 Earned	2 Claim Liability			
			Point			Premium	and Reserve			
	8.41		<\$25,000							
	8.42		\$25,000 - 99,9							
	8.43		100,000 - 249,							
	8.44 8.45		250,000 - 999, 1,000,000 or n							
	0.43	φ	1,000,000 01 11	iore						
8.5	What portion of ea	arned premium reported	in 8.31, Colum	nn 1 was assumed	from pools?			\$		
9.1	Does the company	y have variable annuities	with guarante	ed benefits?				Yes [] No [X]	
9.2	If 9.1 is yes, comp	lete the following table f	or each type of	guaranteed benefi	it.					
	Тур		3	4	5	6	7	8	9	
	1 Guaranteed	2 Guaranteed	Waiting Period	Account Value	Total Related	Gross Amount	Location of	Portion	Reinsurance	
	Death Benefit	Living Benefit	Remaining	Related to Col. 3	Account Values	of Reserve	Reserve	Reinsured	Reserve Credit	
10.		ies having sold annuities as the result of the purc				annuities has obtaine	ed a release of liability fro	m the		
10.1								\$		
10.2	List the name and	location of the insuranc	e company pur	rchasing the annuit	ies and the stateme	ent value on the purch	ase date of the annuities	i.		
		/alua								
		/alue Date								
	of Annuities P&C Insurance Company And Location (i.e., Present Vi									
P&C Insurance Company And Location							, ,	value)		
	<u> </u>									
11.1	Do you act as a cu	ustodian for health savin	gs accounts?					Yes [] No [X]	
11.2	2 If yes, please provide the amount of custodial funds held as of the reporting date.									
11.3	3 Do you act as an administrator for health savings accounts?] No [X]	
11.4	4 If yes, please provide the balance of funds administered as of the reporting date.									

FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e. 17.6.

Show amounts of life insurance in this exhibit in thousands (OMIT \$000)

	Show amounts of		this exhibit in thous			-
		1 2010	2 2009	3 2008	4 2007	5 2006
	Life Insurance in Force					
	(Exhibit of Life Insurance)					
1.	Ordinary - whole life and endowment (Line 34, Col. 4)	20, 217	20, 219	21 241	22 542	22 740
2.	Ordinary - term (Line 21, Col. 4, less Line 34, Col. 4)					
3.	Credit life (Line 21, Col. 6)				10, 190	19,991
4.	Group, excluding FEGLI/SGLI (Line 21, Col. 9 less					
_	Lines 43 & 44, Col. 4)					
	Industrial (Line 21, Col. 2)					
6.	FEGLI/SGLI (Lines 43 & 44, Col. 4)	20.050	05.040	20.004	40.700	40.704
7.	Total (Line 21, Col. 10)	33,859 [35,918	38,064	40,739	43,/31
	New Business Issued (Exhibit of Life Insurance)					
8.	Ordinary - whole life and endowment (Line 34, Col.					
	2)					
9.	Ordinary - term (Line 2, Col. 4, less Line 34, Col. 2)					
10.	Credit life (Line 2, Col. 6)					
11.	Group (Line 2, Col. 9)					
12.	Industrial (Line 2, Col. 2)					
13.	Total (Line 2, Col. 10) Premium Income - Lines of Business					
	(Exhibit 1 - Part 1)					
14.	Industrial life (Line 20.4, Col. 2)					
15.1	Ordinary-life insurance (Line 20.4, Col. 3)	297 . 410	316.302			397.976
	Ordinary-individual annuities (Line 20.4, Col. 4)					
16	Credit life (group and individual) (Line 20.4, Col. 5)					
17.1	Group life insurance (Line 20.4, Col. 6)					
	Group annuities (Line 20.4, Col. 7)					
18.1	A & H-group (Line 20.4, Col. 8)					
18.2	A & H-credit (group and individual) (Line 20.4, Col. 9)					
10 2	A & H-other (Line 20.4, Col. 10)					
	Aggregate of all other lines of business (Line					
13.	20.4,Col. 11)					
20.	Total	297,410	316,302	338,945	374, 131	397,976
	Balance Sheet (Pages 2 & 3)					
21.	Total admitted assets excluding Separate Accounts business (Page 2, Line 26, Col. 3)	17 136 //70	16 784 114	17 364 526	16 807 500	16 175 307
22.	Total liabilities excluding Separate Accounts					
	business (Page 3, Line 26)					5,952,739
23.	Aggregate life reserves (Page 3, Line 1)					5,702,163
24.	Aggregate A & H reserves (Page 3, Line 2)					
25.	Deposit-type contract funds (Page 3, Line 3)			40.000		
26.	Asset valuation reserve (Page 3, Line 24.01)		· ·	· ·	,	2,500,000
27. 28.	Capital (Page 3, Lines 29 and 30)		, ,			
20.	Cash Flow (Page 5)			0,403,201	0,000,904 [
29.	Net Cash from Operations (Line 11)	414 469	482 556	526 134	496 856	439 626
20.	Risk-Based Capital Analysis					
30.	Total adjusted capital	10,799,335	10,294,077	11,025,297	10,536,974	10,268,581
31.	Authorized control level risk - based capital			103,055		
	Percentage Distribution of Cash, Cash					
	Equivalents and Invested Assets					
	(Page 2, Col. 3) (Line No. /Page 2, Line 12, Col. 3) x 100.0					
32.	Bonds (Line 1)	97.4	93.4	92.2	91.6	90.6
33.	Stocks (Lines 2.1 and 2.2)					3.2
34.	Mortgage loans on real estate(Lines 3.1 and 3.2)					
35.	Real estate (Lines 4.1, 4.2 and 4.3)					
36.	Cash, cash equivalents and short-term investments	, ,				
07	(Line 5)					
37.	Contract loans (Line 6)					
38. 39.	Derivatives (Page 2, Line 7)					
39. 40.	Receivables for securities (Line 9)					0.5
40. 41.	Securities lending reinvested collateral assets (Line					
 11.	10)		xxx	XXX	xxx	XXX
42.	Aggregate write-ins for invested assets (Line 11)					
43.	Cash, cash equivalents and invested assets	100.0	100.0	100.0	100.0	100.0
	(Line 12)	IUU.U	IUU.U	100.0	100.0	IUU.U

FIVE-YEAR HISTORICAL DATA

(Continued) 5 2010 2009 2008 2007 2006 Investments in Parent, Subsidiaries and Affiliated bonds (Schedule D Summary, Line 12. 44. Col. 1) .. Affiliated preferred stocks (Schedule D Summary, 45. Line 18, Col. 1) .. Affiliated common stocks (Schedule D Summary 46. Line 24, Col. 1), ... Affiliated short-term investments (subtotal included 47. in Schedule DA Verification, Col. 5, Line 10) Affiliated mortgage loans on real estate. 48. 49. 50. Total of above Lines 44 to 49 Total Nonadmitted and Admitted Assets Total nonadmitted assets (Page 2, Line 28, Col. 2)... ..634,006 .650,406 643,731 .682,829 829.511 51. Total admitted assets (Page 2, Line 28, Col. 3) . .17, 136, 479 .16,784,114 .17,364,526 .16,807,590 .16, 175, 307 Investment Data Net investment income (Exhibit of Net Investment 53. 799.097 820.443 859.671 885.151 874.221 Realized capital gains (losses) ...9,817 ...1,712 ..(328) ..(600) .5,518 54. 55. Unrealized capital gains (losses) 56. Total of above Lines 53, 54 and 55 .808,914 .822, 155 .859,343 .884,551 .879,739 Benefits and Reserve Increases (Page 6) Total contract benefits - life (Lines 10, 11, 12, 13, 14 57. and 15 Col. 1, minus Lines 10, 11,12, 13, 14 and 15 Cols. 9, 10 and 11) . 298 112 257 109 192 854 256 963 387 353 Total contract benefits - A & H (Lines 13 & 14, Cols. 58. 9, 10 & 11) Increase in life reserves - other than group and 59. (161.067) 191.410 45.546 51.425 (650.350) annuities (Line 19, Cols. 2 and 3) Increase in A & H reserves (Line 19, Cols. 9, 10 & 60. 11) .. Dividends to policyholders (Line 30, Col. 1) ... 61. **Operating Percentages** 62. Insurance expense percent (Page 6, Col. 1, Lines 21, 22 & 23, less Line 6)/(Page 6, Col. 1, Line 1 .50.1 59.3 49.3 .61.4 plus Exhibit 7, Col. 2, Line 2) x 100.0 Lapse percent (ordinary only) [(Exhibit of Life Insurance, Col. 4, Lines 14 & 15) / 1/2 (Exhibit of 63. 3.2 4.3 5.5 Life Insurance, Col. 4, Lines 1 & 21)] x 100.0 . 5.3 6.3 A & H loss percent (Schedule H, Part 1, Lines 5 and 64. 6, Col. 2) A & H cost containment percent (Schedule H, Pt. 1. 65. Line 4, Col. 2). A & H expense percent excluding cost containment expenses (Schedule H, Pt. 1, Line 10, Col. 2) A & H Claim Reserve Adequacy Incurred losses on prior years' claims - group health (Schedule H, Part 3, Line 3.1 Col. 2) 67. 68. Prior years' claim liability and reserve - group health (Schedule H, Part 3, Line 3.2 Col. 2) .. Incurred losses on prior years' claims-health other than group (Schedule H, Part 3, Line 3.1 Col. 1 69. less Col. 2) Prior years' claim liability and reserve-health other than group (Schedule H, Part 3, Line 3.2 Col. 1 less Col. 2) **Net Gains From Operations After Federal** Income Taxes by Lines of Business (Page 6, Line 33) 71. Industrial life (Col. 2) Ordinary - life (Col. 3) 517.040 1.112.074 72. 242.043 470.633 454.188 73. Ordinary - individual annuities (Col. 4) Ordinary-supplementary contracts (Col. 5) 74. 75. Credit life (Col. 6) 76. Group life (Col. 7) 77. Group annuities (Col. 8). 78. A & H-group (Col. 9) 79. A & H-credit (Col. 10) .. A & H-other (Col. 11) ... 81. Aggregate of all other lines of business (Col. 12) ...

NOTE:	If a party to a merger, have the two most recent years	of this exhibit been restated due to a merger in	compliance with the disclosure			
	requirements of SSAP No. 3, Accounting Changes an	nd Correction of Errors?		Yes [] No []
	If no please explain:					

242.043

470.633

454 . 188

1.112.074

517.040

82

Total (Col. 1)



AND TENER TO THE TENER	io 10 Ci Trie Cymetra National Elic modranice Company
DIRECT BUSINESS IN THE STATE OF Grand Total	DURING THE YEA

DIKE	CT BUSINESS IN THE STATE OF Grand Total				DURING THE	E YEAR 2010
NAIC	Group Code 1129	LI	FE INSURANCE		NAIC Compa	ny Code 90581
	DIRECT PREMIUMS AND ANNUITY CONSIDERATIONS	1 Ordinary	2 Credit Life (Group and Individual)	3 Group	4 Industrial	5 Total
1.		295.445		•		295.445
2.	Annuity considerations					,
3.	Deposit-type contract funds		XXX			
4	Other considerations					
5.	Totals (Sum of Lines 1 to 4)	295.445				295.445
- J.	DIRECT DIVIDENDS TO POLICYHOLDERS	233,443				290,440
l ife ir	surance:					
6.1	D 111 1 1 0 1 1					
6.2						
6.3	Applied to provide paid-up additions or shorten the endowment or premium-paying period					
6.4	Other					
6.5	Totals (Sum of Lines 6.1 to 6.4)					
Annu						
7.1	Paid in cash or left on deposit					
7.2	Applied to provide paid-up annuities					
7.3	Other					
7.4	Totals (Sum of Lines 7.1 to 7.3)					
8.	Grand Totals (Lines 6.5 plus 7.4)					
	DIRECT CLAIMS AND BENEFITS PAID					
9.	Death benefits					206,732
10.	Matured endowments					
11.	Annuity benefits					
12.	Surrender values and withdrawals for life contracts	84,736				84,736
13.						
14.	All other benefits, except accident and health	6,644				6,644
15.	Totals	298, 112				298, 112
	DETAILS OF WRITE-INS					
1301.						
1302.	-					
1303.						
1000	Commany of Line 10 from available name					

	C	Ordinary		redit Life and Individual)		Group	Ir	ndustrial		Total
DIRECT DEATH BENEFITS AND MATURED ENDOWMENTS	1	2	3 No. of Ind.Pols. & Gr.	4	5 No. of	6	7	8	9	10
INCURRED	No.	Amount	Certifs.	Amount	Certifs.	Amount	No.	Amount	No.	Amount
16. Unpaid December 31, prior year										
17. Incurred during current year Settled during current year:	10	206,732							10	206,732
18.1 By payment in full	10	206,732							10	206,732
compromised claims	10	206 732								206,732
18.4 Reduction by compromise 18.5 Amount rejected										
18.6 Total settlements	10	206,732							10	206,732
19. Unpaid Dec. 31, current year (16+17-18.6)										
POLICY EXHIBIT					No. of Policies					
20. In force December 31, prior year	2,462	35,917,018		(a)					2,462	35,917,018
21. Issued during year 22. Other changes to in force (Net)		(2,059,346)							(115)	(2,059,346)
23. In force December 31 of current year	2,347	33,857,672		(a)					2,347	33,857,672

1399. Totals (Lines 1301 thru 1303 plus 1398) (Line 13 above)

(a) Includes	Individual Credit Life I	nsurance p	rior year \$, current y	ear \$	 		
Includes	Group Credit Life Insu	rance Loar	is less than oi	equal to 60 mg	onths at issue, prior	year \$, CL	ırrent year \$.	
Loans g	reater than 60 months	at issue BL	IT NOT GREA	ATER THAN 12	20 MONTHS, prior y	/ear \$, CL	ırrent year \$.	

ACCIDENT AND HEALTH INSURANCE

ACCIDENT AND HEALTH INSURANCE											
1	2	3	4	5							
		Dividends Paid Or									
	Direct Premiums	Credited On Direct		Direct Losses							
	Earned	Business	Direct Losses Paid	Incurred							
	Direct Premiums	1 2 Direct Premiums Earned	1 2 Dividends Paid Or Credited On Direct Premiums Earned Business	1 2 Dividends Paid Or Credited On Direct Business Direct Losses Paid							

b) For health business on indicated lines report:	Number of persons insured under PPO managed care produc	ts0 and number of persons
insured under indemnity only products	0	

EXHIBIT OF LIFE INSURANCE

					OF LIFE IN						
			ustrial		linary	Credit Life (Gro	up and Individual)		Group		10
		1	2	3	4	5 Number of Individual Policies and Group	6	Nun 7	mber of 8	9	Total
		Number of Policies	Amount of Insurance (a)	Number of Policies	Amount of Insurance (a)		Amount of Insurance (a)	Policies	Certificates	Amount of Insurance (a)	Amount of Insurance (a)
1.	In force end of prior year			2.462	35.918						35.918
2.	Issued during year			· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·						, , , , , , , , , , , , , , , , , , ,
3.	Reinsurance assumed										
4.	Revived during year			1	25						25
5.	Increased during year (net)										
6.	Subtotals, Lines 2 to 5			1	25						25
7.	•	XXX		XXX		XXX		XXX	XXX		
8.	Aggregate write-ins for increases										
-	Totals (Lines 1 and 6 to 8)			2,463	35,943						35,943
"	Deductions during year:										
10	Death			9	206			XXX			206
11.				10	105			XXX			105
12.	Disability							XXX			
13.	Expiry			23	232						232
14.	, ,			64	928						928
15.	Lapse			10	175						175
16.	Conversion			10	173			XXX	XXX	XXX	175
17.	Decreased (net)				438						438
18.	,										
									-		
				116	2,084						2,084
	I otals (Lines 10 to 19)			2,347					-		33,859
		XXX									
	Reinsurance ceded end of year			XXX	00.050	XXX		XXX	XXX		00.050
23.	Line 21 minus Line 22	XXX		XXX	33,859	XXX	(b)	XXX	XXX		33,859
	DETAILS OF WRITE-INS										
						1					
0802.							-				
0803.	Summary of remaining write-ins for Line 8 from overflow										
0898.	page										
0899.	TOTALS (Lines 0801 thru 0803 plus 0898) (Line 8										
0033.	above)										
1901.											
1902.											
1903.											
1998.	Summary of remaining write-ins for Line 19 from overflow	1									
	page.										
1999.	TOTALS (Lines 1901 thru 1903 plus 1998) (Line 19										
	above)]									

(8	1)	Amounts	of life	insurance ir	ı this	exhibit	shall b	e shown	in t	housands	(omit	000	ı)
----	----	---------	---------	--------------	--------	---------	---------	---------	------	----------	-------	-----	----

⁽b) Group \$; Individual \$

EXHIBIT OF LIFE INSURANCE (Continued) ADDITIONAL INFORMATION ON INSURANCE IN FORCE END OF YEAR

	ADDITIONAL INI CHIMATION ON	I IIIOOIIAIIOE III I C	THE LIND OF TEAT	•	
		Indu	strial	Ordi	nary
		1	2	3	4
			Amount of Insurance		Amount of Insurance
		Number of Policies	(a)	Number of Policies	(a)
24.	Additions by dividends	XXX		XXX	
25.	Other paid-up insurance			581	6, 144
26.	Debit ordinary insurance	XXX	XXX		

ADDITIONAL INFORMATION ON ORDINARY INSURANCE

	ADDITIONAL INI OTIMAT	Issued D	uring Year		nd of Year
		(Included	in Line 2)	(Included	in Line 21)
		1	2	3	4
			Amount of Insurance		Amount of Insurance
	Term Insurance Excluding Extended Term Insurance	Number of Policies	(a)	Number of Policies	(a)
27.	Term policies - decreasing			24	170
28.	Term policies - other			771	13,421
29.	Other term insurance - decreasing			XXX	
30.	Other term insurance			XXX	50
31.	Totals (Lines 27 to 30)	-		795	13,641
	Reconciliation to Lines 2 and 21:				
32.	Term additions	XXX		XXX	
33.	Totals, extended term insurance	XXX	XXX		
34.	Totals, whole life and endowment	_		1,552	20,217
35.	Totals (Lines 31 to 34)			2,347	33,858

CLASSIFICATION OF AMOUNT OF INSURANCE (a) BY PARTICIPATING STATUS

			ıring Year in Line 2)	In Force End of Year (Included in Line 21)			
		1	2	3	4		
		Non-Participating	Participating	Non-Participating	Participating		
36	Industrial						
37.	Ordinary			33,858			
38.	Credit Life (Group and Individual)						
39.	Group						
40.	Totals (Lines 36 to 39)			33,858			

ADDITIONAL INFORMATION ON CREDIT LIFE AND GROUP INSURANCE

	ADDITIONA									
						Credit	Life			oup
					1		2	1	3	4
		lack		licio	Individual Gro		Anount of Ir			Amount of Insurance
				C	e ific es		(2)		Number of Certificates	(a)
41.	Amount of insurance included in Line 2 ceded to	her conp	nies		. KXX				XXX	
42.	Number in force end of year if the number under on a pro-rata basis	ared gl	s is unted		\			I		xxx
43.	Federal Employees' Group Life Insurance included	d in Line 21								
44.	Servicemen's Group Life Insurance included in Lir	ne 21								
45.	Group Permanent Insurance included in Line 21									

			DITI	N <i>A</i>	AC	CCIDE	TAI	A	ΑT	ГН	ENI	FITS
46.	Amount of additional accidental death benefits in	rce	pd o	/ea	unde	er ordina	ро	ies)		
				\								

BASIL OF CALCULATION CORP. ARY T. RM. NSURANCE

		DAG:		07.	705		9				TOOTIATOL
	47.	State basis of calculation of (47.1) decreasing ter	iì.	rance	con	ined in Fan	lno	m	Morte	ge F	otection, etc., policies and riders and of (47.2) term insurance on
		wife and children under Family, Parent and Child	en,	ç., p	icie	and riders i	rud	l ab	e.		
		47.1									
L		47.2							- 1		

POLICIES WITH DISABILITY PROVISIONS

			Industrial		Ordinary		Credit		Group
		1	2	3	4	5	6	7	8
								Number of	
		Number of	Amount of Insurance	Number of	Amount of Insurance	Number of	Amount of Insurance	Certifi-	Amount of Insurance
	Disability Provisions	Policies	(a)	Policies	(a)	Policies	(a)	cates	(a)
48.	Waiver of Premium			477	11,814				
49.	Disability Income								
50.	Extended Benefits			XXX	XXX				
51.	Other								
52.	Total		(b)	477	(b) 11,814		(b)		(b)

⁽a) Amounts of life insurance in this exhibit shall be shown in thousands (omit 000)

⁽b) See Paragraph 9 of the Annual Audited Financial Reports in the General section of the annual statement instructions

Exhibit of Number of Policies, Contracts, ...Supplementary Contracts $N\ O\ N\ E$

Exhibit of Number of Policies, Contracts, ... Annuities NONE

Exhibit of Number of Policies, Contracts, ... Accident and Health Insurance $N\ O\ N\ E$

Exhibit of Number of Policies, Contracts, ...Deposit Funds $N\ O\ N\ E$

FORM FOR CALCULATING THE INTEREST MAINTENANCE RESERVE

INTEREST MAINTENANCE RESERVE

		1 Amount
1.	Reserve as of December 31, Prior Year	66,738
2.	Current year's realized pre-tax capital gains/(losses) of \$	6,381
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)	73,119
5.	Current year's amortization released to Summary of Operations (Amortization, Line 1, Column 4)	7,053
6.	Reserve as of December 31, current year (Line 4 minus Line 5)	66,066

AMORTIZATION

		1	2	3	4
	Year of Amortization	Reserve as of December 31, Prior Year	Current Year's Realized Capital Gains/(Losses) Transferred into the Reserve Net of Taxes	Adjustment for Current Year's Liability Gains/(Losses) Released From the Reserve	Balance Before Reduction for Current Year's Amortization (Cols. 1 + 2 + 3)
1.	2010	4,206	2,846		7,052
2.	2011	3,929	2,945		6,874
3.	2012	3,565	37		3,602
4.	2013	3,986	39		4,025
5.	2014	4,988	42		5,030
6.	2015	5,418	44		5,463
7.	2016	5,943	48		5,991
8.	2017	6,540	50		6,590
9.	2018	6,933	53		6,986
10.	2019	6,690	57		6,747
11.	2020	5,676	60		5,736
12.	2021	4,361	56		4,417
13.	2022	2,912	45		2,957
14.	2023	1,333	33		1,366
15.	2024	255	20		275
16.	2025		7		7
17.	2026				
18.	2027				
19.	2028				
20.	2029				
21.	2030				
22.	2031				
23.	2032				
24.	2033				
25.	2034				
26.	2035				
27.	2036				
28.	2037				
29.	2038				
30.	2039				
31.	2040 and Later				
32.	Total (Lines 1 to 31)	66,738	6,381		73,119

ASSET VALUATION RESERVE

			Default Component			Equity Component		
		1	2	3	4	5 Real Estate and	6	7
		Other Than Mortgage Loans	Mortgage Loans	Total (Cols. 1 + 2)	Common Stock	Other Invested Assets	Total (Cols. 4 + 5)	Total Amount (Cols. 3 + 6)
1.	Reserve as of December 31, prior year	50,490		50,490				50,490
2.	Realized capital gains/(losses) net of taxes - General Account							
3.	Realized capital gains/(losses) net of taxes - Separate Accounts							
4.	Unrealized capital gains/(losses) net of deferred taxes - General Account							
5.	Unrealized capital gains/(losses) net of deferred taxes - Separate Accounts							
6.	Capital gains credited/(losses charged) to contract benefits, payments or reserves							
7.	Basic contribution	9,407		9,407				9,407
8.	Accumulated balances (Lines 1 through 5 - 6 + 7)	59,897		59,897				59,897
9.	Maximum reserve	48 , 197		48 , 197				48 , 197
10.	Reserve objective	34,479		34,479				34,479
11.	20% of (Line 10 - Line 8)	(5,084)		(5,084)				(5,084)
12.	Balance before transfers (Lines 8 + 11)	54,814		54,814				54,814
13.	Transfers							XXX
14.	Voluntary contribution							
15.	Adjustment down to maximum/up to zero	(6,617)		(6,617)				(6,617)
16.	Reserve as of December 31, current year (Lines 12 + 13 + 14 + 15)	48, 197		48, 197				48, 197

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

					IAGEIG	CIVIPONEI	4 I					
			1	2	3	4	Basic (Contribution	Reserv	ve Objective	Maximu	m Reserve
							5	6	7	8	9	10
Line				Reclassify		Balance for AVR						
Num-	NAIC	5	Book/Adjusted	Related Party	Add Third Party	Reserve Calculations	_	Amount	_	Amount	_	Amount
ber	Designation	'	Carrying Value	Encumbrances	Encumbrances	(Cols. 1 + 2 + 3)	Factor	(Cols.4 x 5)	Factor	(Cols. 4 x 7)	Factor	(Cols. 4 x 9)
		LONG-TERM BONDS										
1.		Exempt Obligations	7,460,458	XXX	XXX	7,460,458	0.0000		0.0000		0.0000	
2.	1	Highest Quality	7,611,406	XXX	XXX	7,611,406	0.0004	3,045	0.0023	17,506	0.0030	22,834
3.	2	High Quality	853,743	XXX	XXX	853,743	0.0019	1,622	0.0058	4,952	0.0090	7,684
4.	3	Medium Quality	499,965	XXX	XXX	499,965	0.0093	4,650	0.0230	11,499	0.0340	16,999
5.	4	Low Quality		XXX	XXX		0.0213		0.0530		0.0750	
6.	5	Lower Quality		XXX	XXX		0.0432		0.1100		0.1700	
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)	16,425,572	XXX	XXX	16,425,572	XXX	9,316	XXX	33,957	XXX	47,517
		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		XXX	XXX		0.0000		0.0000		0.0000	
19.	1	Highest Quality	226,797	XXX	XXX		0.0004	91	0.0023	522	0.0030	680
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)	226,797	XXX	XXX	226.797	XXX	91	XXX	522	XXX	680

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

			1	2	3	4	Basic C	Contribution	Reserve	Objective	Maximur	m Reserve
Line Num- ber	NAIC Designation	Description	Book/Adjusted Carrying Value	Reclassify Related Party Encumbrances	Add Third Party Encumbrances	Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3)	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)	16,652,369	XXX	XXX	16,652,369	XXX	9,407	XXX	34,479	XXX	48,19
0.5		MORTGAGE LOANS In Good Standing:			xxx		0.0063 (a)		0.0120 (a)		0.0190 (a)	
35.		Farm Mortgages										
36. 37.					XXX		0.0003 0.0013		0.0006 0.0030		0.0010	
37. 38.		Residential Mortgages - All Other Commercial Mortgages - Insured or Guaranteed			XXX		0.0003		0.0006		0.0010	
38. 39.		5 5			XXX		0.0063 (a)		0.0120 (a)		0.0190 (a)	
39. 40.		Commercial Mortgages - All Other			XXX		0.2800 (b)		0.6200 (b)		1.0000 (b)	
40.		Overdue, Not in Process:									1.0000 (b)	
41.		Farm Mortgages			XXX		0.0420		0.0760		0.1200	
41.		Residential Mortgages - Insured or Guaranteed			XXX		0.0005		0.0012		0.0020	
43.		Residential Mortgages - All Other			XXX		0.0025		0.0058		0.0020	
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	
40.		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		(c)		(c)		(c)	
53.		Total Mortgage Loans on Real Estate (Lines 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 - Equity Component NONE

Asset Valuation Reserve Replications (Synthetic) Assets
NONE

Schedule F - Claims
NONE

Schedule H - Part 1 - Analysis of Underwriting Operations
NONE

Schedule H - Part 2 - Reserves and Liabilities
NONE

Schedule H - Part 3 - Prior Year's Claim Reserves and Liabilities

NONE

Schedule H - Part 4 - Reinsurance NONE

Schedule H - Part 5 - Health Claims
NONE

Schedule S - Part 1 - Section 1

NONE

Schedule S - Part 1 - Section 2

NONE

Schedule S - Part 2

NONE

Schedule S - Part 3 - Section 1

NONE

Schedule S - Part 3 - Section 2

NONE

Schedule S - Part 4
NONE

Schedule S - Part 5
NONE

SCHEDULE S - PART 6

Restatement of Balance Sheet to Identify Net Credit for Ceded Reinsurance

		1 As Reported (net of ceded)	2 Restatement Adjustments	3 Restated (gross of ceded)
	ASSETS (Page 2, Col. 3)			
1.	Cash and invested assets (Line 12)	16,861,323		16,861,323
2.	Reinsurance (Line 16)			
3.	Premiums and considerations (Line 15)	49,785		49,785
4.	Net credit for ceded reinsurance	XXX		
5.	All other admitted assets (balance)	225,371		225,371
6.	Total assets excluding Separate Accounts (Line 26)	17,136,479		17, 136, 479
7.	Separate Account assets (Line 27)			
8.	Total assets (Line 28)	17, 136, 479		17,136,479
	LIABILITIES, CAPITAL AND SURPLUS (Page 3)			
9.	Contract reserves (Lines 1 and 2)	6, 178, 641		6, 178, 641
10.	Liability for deposit-type contracts (Line 3)			
11.	Claim reserves (Line 4)	2,000		2,000
12.	Policyholder dividends/reserves (Lines 5 through 7)			
13.	Premium & annuity considerations received in advance (Line 8)	3,001		3,001
14.	Other contract liabilities (Line 9)	66,066		66,066
15.	Reinsurance in unauthorized companies (Line 24.02)			
16.	Funds held under reinsurance treaties with unauthorized reinsurers (Line 24.03)			
17.	All other liabilities (balance)	135,633		135,633
18.	Total liabilities excluding Separate Accounts (Line 26)	6,385,341		6,385,341
19.	Separate Account liabilities (Line 27)			
20.	Total liabilities (Line 28)	6,385,341		6,385,341
21.	Capital & surplus (Line 38)		xxx	10,751,138
22.	Total liabilities, capital & surplus (Line 39)	17, 136, 479		17, 136, 479
	NET CREDIT FOR CEDED REINSURANCE			
23.	Contract reserves			
24.	Claim reserves			
25.	Policyholder dividends/reserves			
26.	Premium & annuity considerations received in advance			
27.	Liability for deposit-type contracts			
28.	Other contract liabilities			
29.	Reinsurance ceded assets			
30.	Other ceded reinsurance recoverables			
31.	Total ceded reinsurance recoverables			
32.	Premiums and considerations			
33.	Reinsurance in unauthorized companies			
34.	Funds held under reinsurance treaties with unauthorized reinsurers			
35.	Other ceded reinsurance payables/offsets			
36.	Total ceded reinsurance payable/offsets			
37.	Total net credit for ceded reinsurance			

SCHEDULE T - PREMIUMS AND ANNUITY CONSIDERATIONS

Allocated by States and Territories Life Contracts Accident and Health Insurance Premiums, Including Policy, Membership Total Life Insurance Annuity Other Deposit-Type 2 through 5 Active Status Premium Considerations and Other Fees Considerations Contracts Alabama .12,514 AL 2. Alaska 173 173 3. Arizona ΑZ 1.768 1.768 Arkansas 1,006 .1,006 AR 5. California CA 28.825 28.825 6. Colorado CO ..2,280 .2,280 Connecticut СТ .6,622 .6,622 8. Delaware DE 128 128 District of Columbia DC 10. Florida 12,620 12,620 11. Georgia GΑ 14.077 14.077 12. ΗΙ 13 Idaho 6.808 6.808 ID 14. Illinois IL 15,659 15,659 Indiana 15. 3,731 .3,731 IN 16. lowa 2.403 2.403 Kansas KS 6 301 6 301 18. Kentucky 2,795 2,795 ΚY 19. Louisiana .6, 165 .6, 165 Maine . 20. ME 21 Maryland 6,608 6,608 MD 22. Massachusetts MA 28 763 763 MI 24 Minnesota 833 833 MN 25. Mississippi MS 6.203 6.203 28,336 .28,336 MO 27. Montana 411 411 28. Nebraska NF 166 166 3,485 .3,485 ΝV 30. New Hampshire 59 59 NH 31. New Jersey 159 159 N.I N New Mexico 1,609 1,609 NM 33. New York NY 1 014 1 014 34. North Carolina NC 5.981 5.981 35. North Dakota ND 36. Ohio ОН 4.619 4 619 37. Oklahoma 1,773 OK 1,773 12,283 38. Oregon . OR 12,283 39. Pennsylvania РΔ 469 469 40. RI 41. South Carolina .2,999 .2,999 SC 42. South Dakota SD 43. Tennessee 20,639 20.639 ΤN 44. Texas. 13,384 13,384 45. Utah .. UT 1.069 1.069 46. Vermont VT 47. Virginia VA 7 826 7 826 Washington .44.062 WA 44.062 49. West Virginia 455 455 W۷ 50. Wisconsin ١٨/١ 4.085 4 085 Wyoming 1,280 .1,280 WY 52. American Samoa AS 53. Guam. GH Puerto Rico PR 55 U.S. Virgin Islands ۷I Northern Mariana Islands 56. MP N .972 972 CN 58. Aggregate Other Alien 59. Subtotal 295.445 295.445 Reporting entity contributions for employee bene 91. Dividends or refunds applied to purchase paid-up additions and annuities.

Dividends or refunds applied to shorten endowment or premium paying period. XXX 92. Premium or annuity considerations waived under disability or other contract provisions..... 93. XXX 6.644 6.644 Aggregate or other amounts not allocable by State 94 XXX 95. Totals (Direct Business). XXX 302.089 302.089 Plus reinsurance assumed XXX 97 Totals (All Business) 302,089 302,089 Less reinsurance ceded... 98. XXX Totals (All Business) less Reinsurance Ceded 302,089 302,089 XXX **DETAILS OF WRITE-INS** 5801 XXX 5802 XXX. 5803. XXX 5898 Summary of remaining write-ins for Line 58 from XXX 5899. 58 above) XXX 9401 XXX 9402 XXX 9403. XXX 9498. Summary of remaining write-ins for Line 94 from overflow page Totals (Lines 9401 through 9403 plus 9498)(Line 9499. 94 above)

⁽L) Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) Registered - Non-domiciled RRGs; (Q) Qualified - Qualified or Accredited Reinsurer; (E) Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) None of the above - Not allowed to write business in the state

Explanation of basis of allocation by states, etc., of premiums and annuity considerations

The company allocates individual insurance premium based on the billing address of the policyholder.

(a) Insert the number of L responses except for Canada and Other Alien.

(b) Column 4 should balance with Exhibit 1, Lines 6.4, 10.4, and 16.4, Cols. 8, 9, 10, or with Schedule H, Part 1, Line 1, indicate which: Exhibit 1, Lines 6.4, 10.4, and 16.4, Cols. 8, 9, 10....

SCHEDULE T - PART 2

INTERSTATE COMPACT - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories

Direct Business Only

				•	Direct Business Only 3 4 5			
			1	2	3 Disability	4 Long-Term	5	6
			Life	Annuities	Income	Care		
	States, Etc.		(Group and Individual)	(Group and Individual)	(Group and Individual)	(Group and Individual)	Deposit-Type Contracts	Totals
1.	•	AL	12.514	a.v.aaa.y	a.r.aaa.y	arriada;	oonii aata	12,514
			,					,
2.	Alaska		173				 	173
3.	Arizona	AZ	1,768				-	1,768
4.	Arkansas	AR	1,006					1,006
5.	California	CA	28,825					28,825
6.	Colorado	СО	2,280					2,280
7.	Connecticut	СТ	6,622					6,622
8.	Delaware	_	128					128
_								120
9.	District of Columbia	_						
10.	Florida	FL	12,620					12,620
11.	Georgia	GA	14,077					14,077
12.	Hawaii	HI						
13.	ldaho	ID .	6,808					6,808
14.	Illinois	.	15.659					15,659
15.	Indiana	_	3,731					3,731
								,
16.	lowa		2,403					2,403
17.	Kansas		6,301					6,301
18.	Kentucky	KY	2,795					2,795
19.	Louisiana	LA	6,165					6, 165
20.	Maine	ME						
21.	Maryland	MD	6,608					6,608
22.	Massachusetts		28					28
23.	Michigan I		763					763
24.	Minnesota	MN	833					833
25.	Mississippi	MS	6,203					6,203
26.	Missouri	МО	28,336					28,336
27.	Montana	МТ	411					411
28.	Nebraska	NF	166					166
29.	Nevada		3,485					3,485
			•					
30.	New Hampshire		59					59
31.	New Jersey	NJ	159					159
32.	New Mexico	NM	1,609					1,609
33.	New York	NY	1,014					1,014
34.	North Carolina	NC	5,981					5,981
35.	North Dakota	ND						
36.	Ohio		4,619					4.619
		_	1,773					,
37.	Oklahoma							1,773
38.	Oregon		12,283					12,283
39.	Pennsylvania	PA	469				-	469
40.	Rhode Island	RI						
41.	South Carolina	sc	2,999					2,999
42.	South Dakota	SD						
43.	Tennessee		20,639					20.639
			13,384					,
44.	Texas							,
45.	Utah		1,069					1,069
46.	Vermont							
47.	Virginia	VA	7,826					7,826
48.	Washington	WA	44,062					44,062
49.	West Virginia	wv	455					455
50.	Wisconsin		4,085					4,085
	Wyoming		1,280					1,280
51.	, ,						 	1 , ∠ou
52.	American Samoa							
53.	Guam	GU						
54.	Puerto Rico	PR						
55.	U.S. Virgin Islands	VI						
56.	Northern Mariana Islands							
57.	Canada		972					972
			JIE					۷۱۶
58.	Aggregate Other Alien	UΙ		<u> </u>	 	 	 	· ·
59.	Total		295,445			<u> </u>		295,445

SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP PART 1 - ORGANIZATIONAL CHART

Name	FEI#	NAIC#	Domicile	Ownership 10% or greater owners of record (excludes shares held in "street
Symetra Financial Corporation	20-0978027		DE	name" by brokerage firms and other intermediaries): White Mountains Insurance Group, Ltd.* and Berkshire Hathaway, Inc.
Symetra Life Insurance Company	91-0742147	68608	WA	100% Symetra Financial Corporation
Symetra National Life Insurance Company	91-1079693	90581	WA	100% Symetra Life Insurance Company
First Symetra National Life Insurance Company of New York	91-1367496	78417	NY	100% Symetra Life Insurance Company
Symetra Assigned Benefits Service Company	91-1246870		WA	100% Symetra Financial Corporation
Symetra Administrative Services, Inc.	91-1364981		WA	100% Symetra Financial Corporation
Symetra Securities, Inc.	91-0824835		WA	100% Symetra Financial Corporation
Symetra Investment Services, Inc.	91-1354455		WA	100% Symetra Financial Corporation
TFS Training & Consulting, Inc.	20-3494693		WA	100% Symetra Financial Corporation
Clearscape Funding Corporation	20-3820455		WA	100% Symetra Financial Corporation
WSF Receivables I, LLC	26-1099574		FL	100% Clearscape Funding Corporation
Health Network Strategies, LLC	20-8947838		DE	60% Symetra Financial Corporation
				40% Other Members
Medical Risk Managers, Inc.	51-0309072		DE	100% Symetra Financial Corporation
TIF Invest III, LLC	26-3530060		DE	100% Symetra Financial Corporation

^{*} Controlling Entity

SCHEDULE Y

PART 2 - SUMMARY OF INSURER'S TRANSACTIONS WITH ANY AFFILIATES

	FART 2 - SUMMART OF INSURER S TRANSACTIONS WITH ANT ALTIEIATES											
1	2	3	4	5	6	7	8	9	10	11	12	13
						Income/						
						(Disbursements)						
					Purchases, Sales	` Incurred in '						Reinsurance
					or Exchanges of Loans, Securities,	Connection with		Income/		Any Other Material		Recoverable/
					Loans, Securities,	Guarantees or		(Disbursements)		Activity Not in the		(Payable) on
NAIC					Real Estate,	Undertakings for	Management	Incurred Under		Any Other Material Activity Not in the Ordinary Course of		Losses and/or
Company	Federal ID	Names of Insurers and Parent,	Shareholder	Capital	Mortgage Loans or	the Benefit of any	Agreements and	Reinsurance		the Insurer's		Reserve Credit
Code	Number	Subsidiaries or Affiliates	Dividends	Contributions	Other Investments	Affiliate(s)	Service Contracts	Agreements	*	Business	Totals	Taken/(Liability)
	20-0978027	Symetra Financial Corporation	40,000,000	(213,264,501)		, ,					(173,264,501)	, , ,
		Symetra Life Insurance COmpany	(40,000,000)	213,264,501							173,264,501	
	31 0172171	Joynietta Effe modifiance company	(40,000,000)							†I	170,204,301	
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			<u> </u>									
9999999 Cor	ntrol Totals								XXX			

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing unless specifically waived by the domiciliary state. However, in the event that your domiciliary state waives the filing requirement, your response of WAIVED to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

•	·	Responses
1.	MARCH FILING Will the Supplemental Compensation Exhibit be filed with the state of domicile by March 1?	YES
2.	Will the confidential Risk-based Capital Report be filed with the NAIC by March 1?	YES
3.	Will the confidential Risk-based Capital Report be filed with the state of domicile, if required, by March 1?	YES
4.	Will an actuarial opinion be filed by March 1?	YES
5.	APRIL FILING Will Management's Discussion and Analysis be filed by April 1?	YES
6.	Will the Life, Health & Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit be filed with the state of domicile and the NAIC by April 1?	YES
7.	Will the Adjustment Form (if required) be filed with the state of domicile and the NAIC by April 1?	YES
8.	Will the Supplemental Investment Risks Interrogatories be filed by April 1?	YES
	JUNE FILING	
9.	Will an audited financial report be filed by June 1?	YES
10.	Will Accountant's Letter of Qualifications be filed with the state of domicile and electronically with the NAIC by June 1?	YES
	AUGUST FILING	
11.	Will Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile by August 1?	YES
for which	lowing supplemental reports are required to be filed as part of your annual statement filing. However, in the event that your company does not transact the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be plement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but it is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but it is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but it is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but it is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory was provided in the company but it is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation filed for whatever reason enter SEE EXPLANATION and provide an explanation following the company but it is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the company but it is not being filed for whatever reason e	e printed below. If
12.	Will Schedule SIS (Stockholder Information Supplement) be filed with the state of domicile by March 1?	NO
13.	Will the Medicare Supplement Insurance Experience Exhibit be filed with the state of domicile and the NAIC by March 1?	NO
14.	Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC by March 1?	NO
15.	Will the actuarial opinion on participating and non-participating policies as required in Interrogatories 1 and 2 to Exhibit 5 be filed with the state of domicile and electronically with the NAIC by March 1?	NO
16.	Will the actuarial opinion on non-guaranteed elements as required in interrogatory #3 to Exhibit 5 be filed with the state of domicile and electronically with the NAIC by March 1?	YES
17.	Will the actuarial opinion on X-Factors be filed with the state of domicile and electronically with the NAIC by March 1?	NO
18.	Will the actuarial opinion on Separate Accounts Funding Guaranteed Minimum Benefit be filed with the state of domicile and electronically with the NAIC by March 1?	NO
19.	Will the actuarial opinion on Synthetic Guaranteed Investment Contracts be filed with the state of domicile and electronically with the NAIC by March 1?	NO
20.	Will the Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC by March 1?	NO
21.	Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC by March 1?	NO
22.	Will the Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI be filed with the state of domicile and electronically with the NAIC by March 1?	NO
23.	Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value) be filed with the state of domicile and electronically with the NAIC by March 1?	NO
24.	Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) be filed with the state of domicile and electronically with the NAIC by March 1?	NO
25.	Will the C-3 RBC Certifications required under C-3 Phase I be filed with the state of domicile and electronically with the NAIC by March 1?	NO
26.	Will the C-3 RBC Certifications required under C-3 Phase II be filed with the state of domicile and electronically with the NAIC by March 1?	NO

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

Will the Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities be filed with the state of domicile 27 and electronically with the NAIC by March 1? Will the actuarial opinion required by the Modified Guaranteed Annuity Model Regulation be filed with the state of domicile and electronically with the 28 NAIC by March 13 N0 Will the Actuarial Certifications Related to Hedging required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the 29. NAIC by March 1?

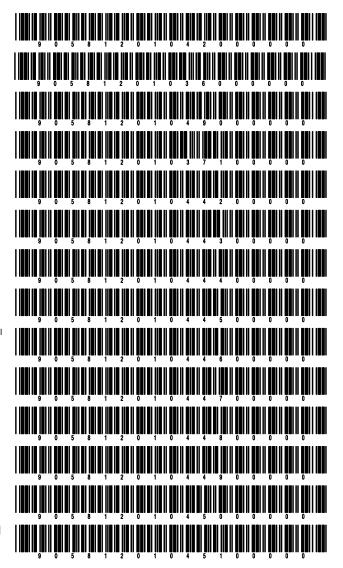
Will the Financial Officer Certification Related to Clearly Defined Hedging Strategy required by Actuarial Guideline XLIII be filed with the state of NO domicile and electronically with the NAIC by March 1? N0 Will the Management Certification That the Valuation Reflects Management's Intent required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the NAIC by March 1? 31 N0 Will the Actuarial Certification Related to the Reserves required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the 32. Will the Worker's Compensation Carve-Out Supplement be filed by March 1? 33 N0 Will Supplemental Schedule O be filed with the state of domicile and the NAIC by March 1? NO 35. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC by March 1? **APRIL FILING** 37. YES 38 40 Will the Analysis of Annuity Operations by Lines of Business be filed with the state of domicile and the NAIC by April 1? NO Will the Analysis of Increase in Annuity Reserves During the Year be filed with the state of domicile and the NAIC by April 1? ... Will the Supplemental Health Care Exhibit (Parts 1, 2 and 3) be filed with the state of domicile and the NAIC by April 1? 42 43 Will the regulator only (non-public) Supplemental Health Care Exhibit's Expense Allocation Report be filed with the stateof domicile and the NAIC by NO AUGUST FILING 44. Will Management's Report of Internal Control Over Financial Reporting be filed with the state of domicile by August 1? N0 12. 13. 14 15 17

Bar Codes:

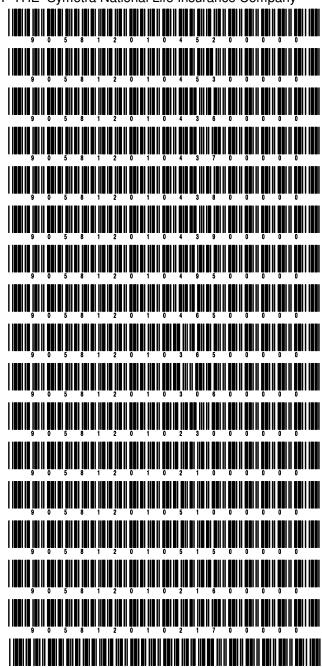
- SIS Stockholder Information Supplement [Document Identifier 420]
- 13. Medicare Supplement Insurance Experience Exhibit [Document Identifier 360]
- 14. Trusteed Surplus Statement [Document Identifier 490]
- 15. Participating Opinion for Exhibit 5 [Document Identifier 371]
- 17. Actuarial Opinion on X-Factors [Document Identifier 442]
- Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit [Document Identifier 443]
- 19. Actuarial Opinion on Synthetic Guaranteed Investment Contracts [Document Identifier 444]
- Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 445]
- Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 446]
- Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI [Document Identifier 447]
- 23. Reasonableness and Consistency of Assumptions Certification required by

Actuarial Guideline XXXVI [Document Identifier 448]

- 24. Reasonableness and Consistency of Assumptions Certification required by
- Actuarial Guideline XXXVI (Updated Market Value) [Document Identifier 449]
- 25. C-3 RBC Certifications Required Under C-3 Phase I [Document Identifier 450]
- 26. C-3 RBC Certifications Required Under C-3 Phase II [Document Identifier 451]



- Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities [Document Identifier 452]
- 28. Modified Guaranteed Annuity Model Regulation [Document Identifier 453]
- Actuarial Certifications Related to Hedging required by Actuarial Guideline XLIII [Document Identifier 436]
- Financial Officer Certification Related to Clearly Defined Hedging Strategy required by Actuarial Guideline XLIII [Document Identifier 437]
- 31. Management Certification That the Valuation Reflects Management's Intent required by Actuarial Guideline XLIII [Document Identifier 438]
- Actuarial Certification Related to the Reserves required by Actuarial Guideline XLIII [Document Identifier 439]
- 33. Workers' Compensation Carve-Out Supplement [Document Identifier 495]
- 34. Supplemental Schedule O [Document Identifier 465]
- 35. Medicare Part D Coverage Supplement [Document Identifier 365]
- 36. Long-Term Care Experience Reporting Forms [Document Identifier 306]
- 38. Credit Insurance Experience Exhibit [Document Identifier 230]
- 39. Accident and Health Policy Experience Exhibit [Document Identifier 210]
- 40. Analysis of Annuity Operations by Lines of Business [Document Identifier 510]
- Analysis of Increase in Annuity Reserves During the Year [Document Identifier 515]
- 42. Supplemental Health Care Exhibit (Parts 1, 2 and 3) [Document Identifier 216]
- Supplemental Health Care Exhibit's Expense Allocation Report [Document Identifier 217]
- Management's Report of Internal Control Over Financial Reporting [Document Identifier 223]



OVERFLOW PAGE FOR WRITE-INS

Additional Write-ins for Assets Line 11			
1197. Summary of remaining write-ins for Line 11 from overflow page			
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Additional Marks in the Assets Line OF			
Additional Write-ins for Assets Line 25			
2597. Summary of remaining write-ins for Line 25 from overflow page			
Additional Write-ins for Liabilities Line 25			
2597. Summary of remaining write-ins for Line 25 from overflow page			
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Additional Write-ins for Liabilities Line 31			
3197. Summary of remaining write-ins for Line 31 from overflow page			
3197. Summary of remaining write-ins for Line 31 from overnow page			
Additional Write-ins for Liabilities Line 34			
3497. Summary of remaining write-ins for Line 34 from overflow page			
Additional Write-ins for Summary of Operations Line 8.3			
08.397. Summary of remaining write-ins for Line 8.3 from overflow page			
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Additional Write-ins for Summary of Operations Line 27			
2797. Summary of remaining write-ins for Line 27 from overflow page			
Additional Write-ins for Summary of Operations Line 53			
5397. Summary of remaining write-ins for Line 53 from overflow page			
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Additional Write-ins for Exhibit of Nonadmitted Assets Line 11		The state of the s	
1197. Summary of remaining write-ins for Line 9 from overflow page			
	·		
Additional Write-ins for Exhibit of Nonadmitted Assets Line 25			
2597. Summary of remaining write-ins for Line 25 from overflow page			

SUMMARY INVESTMENT SCHEDULE

		Gross Investme	ent Holdings	Admitted Assets as Annual Sta	
	Investment Categories	1 Amount	2 Percentage	3 Amount	4 Percentage
1.	Bonds:				
	,	6,028,543	35.754	6,028,543	35.754
	1.2 U.S. government agency obligations (excluding mortgage-backed securities):				
	1.21 Issued by U.S. government agencies				0.000
	1.22 Issued by U.S. government sponsored agencies		0.000		0.000
	Non-U.S. government (including Canada, excluding mortgaged-backed securities) Securities issued by states, territories, and possessions and political	498,846	2.959	498,846	2.959
	subdivisions in the U.S. : 1.41 States, territories and possessions general obligations		0.000		0.000
	1.42 Political subdivisions of states, territories and possessions and				
	political subdivisions general obligations				0.000
	1.43 Revenue and assessment obligations		0.000		0.000
	1.44 Industrial development and similar obligations		0.000		0.000
	1.5 Mortgage-backed securities (includes residential and commercial MBS):				
	1.51 Pass-through securities:	1 421 015	0.400	1 401 015	0.400
	1.511 Issued or guaranteed by GNMA		8.492 2.559		
	1.512 Issued or guaranteed by FNMA and FHLMO		0.000	401,400	0.000
	1.52 CMOs and REMICs:				
	1.521 Issued or guaranteed by GNMA, FNMA, FHLMC or VA	4 670 366	27 699	4 670 366	27.699
	1.522 Issued by non-U.S. Government issuers and collateralized by mortgage-backed securities issued or guaranteed by				
	agencies shown in Line 1.521				0.000
		184,285	1.093	184,285	1.093
2.	Other debt and other fixed income securities (excluding short-term): 2.1 Unaffiliated domestic securities (includes credit tenant loans and hybrid securities)	3 180 159	18.861	3 180 159	18 861
	2.2 Unaffiliated non-U.S. securities (including Canada)			, ,	0.000
					0.000
3.	Equity interests:				
	• •		0.000		0.000
	3.2 Preferred stocks:				
	3.21 Affiliated		0.000		0.000
	3.22 Unaffiliated		0.000		0.000
	3.3 Publicly traded equity securities (excluding preferred stocks):				
	3.31 Affiliated		0.000		0.000
	3.32 Unaffiliated		0.000		0.000
	3.4 Other equity securities:				
	3.41 Affiliated		0.000		0.000
	3.42 Unaffiliated		0.000		0.000
	3.5 Other equity interests including tangible personal property under lease:				
	3.51 Affiliated				
4			0.000		0.000
4.	Mortgage loans: 4.1 Construction and land development		0.000		0.000
	4.2 Agricultural				0.000
	4.3 Single family residential properties				0.000
	4.4 Multifamily residential properties				
	4.5 Commercial loans				
	4.6 Mezzanine real estate loans				0.000
5.	Real estate investments:				
	5.1 Property occupied by company		0.000		0.000
	5.2 Property held for production of income (including				
	\$ of property acquired in satisfaction of debt)		0.000		0.000
	5.3 Property held for sale (including \$				
	property acquired in satisfaction of debt)		0.000		0.000
6.	, , , , ,				0.998
7.		11,718		, , , , , , , , , , , , , , , , , , ,	0.069
8.		255,699		255,699	1.516
9.	Other invested assets		0.000		0.000
10.	Total invested assets	16,861,323	100.000	16,861,323	100.000

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
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
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
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)
12.	Deduct total nonadmitted amounts
13.	Statement value at end of current period (Line 11 minus Line 12)

SCHEDULE D - VERIFICATION BETWEEN YEARS

Bonds and Stocks

 15,891,713
4,448,563
 24,558
 9,817
 3,883,777
 65,302
 16,425,572
 16,425,572

SCHEDULE D - SUMMARY BY COUNTRY

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

_			1 Book/Adjusted	2	3	4
	escripti		Carrying Value	Fair Value	Actual Cost	Par Value of Bonds
BONDS	1.			7,843,003	7,449,590	7,406,702
Governments	2.	Canada			445, 400	
(Including all obligations guaranteed by governments)	3.	Other Countries	498,846	507,889	445,460	500,000
, ,	4.	Totals	7,959,304	8,350,892	7,895,050	7,906,702
U.S. States, Territories and Possessions						
(Direct and guaranteed)	5.	Totals				
U.S. Political Subdivisions of States, Territories and Possessions (Direct and guaranteed)	6.	Totals				
II.C. Carriel assessed and addition	ъ.	Totals				
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	5,101,824	5,084,147	5, 102, 931	4,977,916
	8.	United States	3,364,444	3,557,254	3,382,576	3,292,347
Industrial and Miscellaneous, Credit	9.	Canada				
Tenant Loans and Hybrid Securities (unaffiliated)	10.	Other Countries				
(11.	Totals	3,364,444	3,557,254	3,382,576	3,292,347
Parent, Subsidiaries and Affiliates	12.	Totals				
	13.	Total Bonds	16,425,572	16,992,293	16,380,557	16,176,965
PREFERRED STOCKS	14.	United States				
Industrial and Miscellaneous	15.	Canada				
(unaffiliated)	16.	Other Countries				
	17.	Totals				
Parent, Subsidiaries and Affiliates	18.	Totals				
	19.	Total Preferred Stocks				
COMMON STOCKS	20.	United States				
Industrial and Miscellaneous	21.	Canada				
(unaffiliated)	22.	Other Countries				
	23.	Totals				
Parent, Subsidiaries and Affiliates	24.	Totals				
	25.	Total Common Stocks				
	26.	Total Stocks				
	27.	Total Bonds and Stocks	16,425,572	16,992,293	16,380,557	

SCHEDULE D - PART 1A - SECTION 1

Quality and Maturity Distribution of All Bonds Owned December 31, at Book/Adjusted Carrying Values by Major Types of Issues and NAIC Designations

	Quality and M	laturity Distribution				ying Values by Majo	or Types of Issues a			10	
	1	Over 1 Vear	3 Over 5 Vears	4 Over 10 Vears	5	6	Col 6 as a % of	8 Total from Col. 6	9 % From Col. 7	10 Total Publicly	11 Total Privately
Quality Rating per the NAIC Designation	1 Year or Less	Over 1 Year Through 5 Years	Over 5 Years Through 10 Years	Over 10 Years Through 20 Years	Over 20 Years	Total Current Year	Col. 6 as a % of Line 10.7	Total from Col. 6 Prior Year	Prior Year	Total Publicly Traded	Placed (a)
I. U.S. Governments											
1.1 Class 1	3,217,590	4,059,848	160 , 164	22,575	281	7,460,458	44.8	9,447,925	59.9	7,460,459	
1.2 Class 2											
1.3 Class 3											
1.4 Class 4											
1.5 Class 5											
1.6 Class 6											
1.7 Totals	3,217,590	4,059,848	160, 164	22,575	281	7,460,458	44.8	9,447,925	59.9	7,460,459	
2. All Other Governments											
2.1 Class 1	498,846					498,846	3.0			498,846	
2.2 Class 2											
2.3 Class 3											
2.4 Class 4											
2.5 Class 5											
2.6 Class 6											
2.7 Totals	498,846					498,846	3.0			498,846	
3. U.S. States, Territories and Possessions etc.,											
Guaranteed											
3.1 Class 1											
3.2 Class 2											
3.3 Class 3											
3.4 Class 4											
3.5 Class 5											
3.6 Class 6											
3.7 Totals											
4. U.S. Political Subdivisions of States, Territories and											
Possessions , Guaranteed											
4.1 Class 1											
4.2 Class 2											
4.3 Class 3											
4.4 Class 4											
4.5 Class 5											
4.6 Class 6											
4.7 Totals											
5. U.S. Special Revenue & Special Assessment Obligations, etc., Non-Guaranteed											
5.1 Class 1	170,501	2,428,386	2,367,211	108,644	27,082	5, 101,824	30.6	809,039	5.1	5, 101,824	
5.2 Class 2											
5.3 Class 3											
5.4 Class 4											
5.5 Class 5											
5.6 Class 6											
5.7 Totals	170,501	2,428,386	2,367,211	108,644	27,082	5,101,824	30.6	809,039	5.1	5,101,824	

SCHEDULE D - PART 1A - SECTION 1 (Continued)

Quality and Maturity Distribution of All Bonds Owned December 31, at Book/Adjusted Carrying Values by Major Types of Issues and NAIC Designations

	Quality and M	aturity Distribution	or All Bonds Owned	December 31, at E	sook/Adjusted Carr	ying Values by Majo	or Types of Issues a	and NAIC Designation		40	44
	ı	Over 1 Year	Over 5 Years	Over 10 Years	5	б	Col. 6 as a % of	Total from Col. 6	9 % From Col. 7	10 Total Publicly	11 Total Privately
Quality Rating per the NAIC Designation	1 Year or Less	Through 5 Years	Through 10 Years	Through 20 Years	Over 20 Years	Total Current Year	Line 10.7	Prior Year	Prior Year	Traded	Placed (a)
6. Industrial & Miscellaneous (Unaffiliated)	1 1001 01 2000	·····oug··· o ·· ou.o	····oug.···o	oug.: 20 . ou.0	010.20.00.0	Total Gallone Total	20 1017	11101 1001	1 1101 1 001		aooa (a)
6.1 Class 1	.226,797	1,250,726		760,010		2.237.533	13.4	4,027,550	25.6	2,237,533	
6.2 Class 2	92,834	91,451	246.750	422,708		853,743	5.1	978,717	6.2	853,743	
6.3 Class 3	499,965			, , , , , , , , , , , , , , , , , , , ,		499.965	3.0	499.528	3.2	499.965	
6.4 Class 4	·									·	
6.5 Class 5											
6.6 Class 6											
6.7 Totals	819,596	1,342,177	246,750	1, 182, 718		3,591,241	21.6	5,505,795	34.9	3,591,241	
7. Credit Tenant Loans											
7.1 Class 1											
7.2 Class 2											
7.3 Class 3											
7.4 Class 4											
7.5 Class 5											
7.6 Class 6											
7.7 Totals											
8. Hybrid Securities											
8.1 Class 1											
8.2 Class 2											
8.3 Class 3											
8.4 Class 4											
8.5 Class 5											
8.6 Class 6											
8.7 Totals											
9. Parent, Subsidiaries and Affiliates											
9.1 Class 1											
9.2 Class 2											
9.3 Class 3											
9.4 Class 4											
9.5 Class 5											
9.6 Class 6											
9.7 Totals				_			_				

SCHEDULE D - PART 1A - SECTION 1 (Continued)

Quality and Maturity Distribution of All Bonds Owned December 31, at Book/Adjusted Carrying Values by Major Types of Issues and NAIC Designations

	1	2	3	4	5	6	7	8	9	10	11
O III D II HAMOD II II	4.1/	Over 1 Year	Over 5 Years	Over 10 Years	0 00 1/	T	Col. 6 as a % of	Total from Col. 6	% From Col. 7	Total Publicly	Total Privately
Quality Rating per the NAIC Designation	1 Year or Less	Through 5 Years	Through 10 Years	Through 20 Years	Over 20 Years	Total Current Year	Line 10.7	Prior Year	Prior Year	Traded	Placed (a)
0. Total Bonds Current Year	4 110 704	7 700 000	0 507 075	004 000	07.000	15 000 001	01.0	2007	2004	4F 000 000	
10.1 Class 1	(d)4, 113,734	7,738,960	2,527,375	891,229	27,363	15,298,661	91.9	XXX	XXX	15,298,662	
10.2 Class 2	(d)92,834	91,451	246,750	422,708		853,743	5.1	XXX	XXX	853,743	
10.3 Class 3	(d)499,965					499,965	3.0	XXX	XXX	499,965	
10.4 Class 4	(d)							XXX	XXX		
10.5 Class 5	(d)					(c)		XXX	XXX		
10.6 Class 6	(d)					(c)		XXX	XXX		
10.7 Totals	4,706,533	7,830,411	2,774,125	1,313,937	27,363	(b)16,652,369	100.0	XXX	XXX	16,652,370	
10.8 Line 10.7 as a % of Col. 6	28.3	47.0	16.7	7.9	0.2	100.0	XXX	XXX	XXX	100.0	
11. Total Bonds Prior Year											
11.1 Class 1	2,807,447	8,565,325	1,278,383	1,277,741	355,618	XXX	XXX	14,284,514	90.6	14,284,514	
11.2 Class 2	150 , 166	120,079	246,282	462,190		XXX	XXX	978,717	6.2	978,717	
11.3 Class 3		499,528				XXX	XXX	499,528	3.2	499,528	
11.4 Class 4						XXX	XXX				
11.5 Class 5						XXX	XXX	(c)			
11.6 Class 6						XXX	XXX	(c)			
11.7 Totals	2,957,613	9,184,932	1,524,665	1,739,931	355,618	XXX	XXX	(b)15,762,759	100.0	15,762,759	
11.8 Line 11.7 as a % of Col. 8	18.8	58.3	9.7	11.0	2.3	XXX	XXX	100.0	XXX	100.0	
12. Total Publicly Traded Bonds											
12.1 Class 1	4,113,734	7,738,960	2,527,375	891,229	27,363	15,298,661	91.9	14,284,514	90.6	15,298,661	XXX
12.2 Class 2	92,834	91,451	246,750	422,708		853,743	5.1	978,717	6.2	853,743	XXX
12.3 Class 3	499,965					499,965	3.0	499,528	3.2	499,965	XXX
12.4 Class 4											XXX
12.5 Class 5											XXX
12.6 Class 6											XXX
12.7 Totals	4,706,533	7,830,411	2,774,125	1,313,937	27,363	16,652,369	100.0	15,762,759	100.0	16,652,369	XXX
12.8 Line 12.7 as a % of Col. 6	28.3	47.0	16.7	7.9	0.2	100.0	XXX	XXX	XXX	100.0	XXX
12.9 Line 12.7 as a % of Line 10.7, Col. 6,											
Section 10	28.3	47.0	16.7	7.9	0.2	100.0	XXX	XXX	XXX	100.0	XXX
13. Total Privately Placed Bonds											
13.1 Class 1										XXX	
13.2 Class 2										XXX	
13.3 Class 3										XXX	
13.4 Class 4										XXX	
13.5 Class 5										XXX	
13.6 Class 6										XXX	
13.7 Totals										XXX	
13.8 Line 13.7 as a % of Col. 6							XXX	XXX	XXX	XXX	
13.9 Line 13.7 as a % of Line 10.7, Col. 6, Section 10							XXX	XXX	XXX	XXX	

(a) Includes \$	freely tradable under SEC	Rule 144 or qualified for resale under SEC Rule 144A.				
(b) Includes \$	current year, \$	prior year of bonds with Z designations and \$	184,285 , current year \$	270,245 prior year of bonds with Z*	designations. The letter "Z" mear	is the NAIC designation was not
assigned by the Secu	rities Valuation Office (SVO) at the date of t	ne statement. " Z^* " means the SVO could not evaluate the obligation be	cause valuation procedures for the sec	curity class are under regulatory review.		
(c) Includes \$	current year, \$	prior year of bonds with 5* designations and \$, current year \$	prior year of bonds with 6*	designations. "5*" means the NA	IC designation was assigned by the
(SVO) in reliance on t	he insurer's certification that the issuer is cu	rrent in all principal and interest payments. "6*" means the NAIC design	nation was assigned by the SVO due to	o inadequate certification of principal and interes	t payments.	
(d) Includes the following	amount of non-rated short-term and cash ed	uivalent bonds by NAIC designation: NAIC 1 \$; N	IAIC 2 \$; NAIC 3	3 \$; NAIC 4 \$; NAIC 5 \$.; NAIC 6 \$

SCHEDULE D - PART 1A - SECTION 2

Maturity Distribution of All Bonds Owned December 31, at Book/Adjusted Carrying Values by Major Type and Subtype of Issues

Ma	aturity Distribution of		d December 31, a	at Book/Adjusted			Subtype of issi				
	1	2	3	4	5	6	7	8	9	10	11
Distribution by Type	1 Year or Less	Over 1 Year Through 5 Years	Over 5 Years Through 10 Years	Over 10 Years Through 20 Years	Over 20 Years	Total Current Year	Col. 6 as a % of Line 10.7	Total from Col. 6 Prior Year	% From Col. 7 Prior Year	Total Publicly Traded	Total Privately Placed
1. U.S. Governments	i real of Less	imough 5 rears	imough to rears	moughzo rears	Over 20 reals	TOTAL CULTER TEAL	LINE 10.7	i edi	FIIUI TEAI	Haueu	Flaceu
1.1 Issuer Obligations	2,735,463	3,293,080				6,028,543	36.2	7,400,776	47.0	6,028,543	
1.2 Single Class Mortgage-Backed /Asset Backed Securities	482 127	766.768	160 . 164	22,575	281	1.431.915	8.6		13.0	1.431.915	
1.7 Totals	3,217,590	4,059,848	160, 164	22.575	281	7,460,458	44.8		59.9	7,460,458	
2. All Other Governments	0,217,000	4,000,040	100, 104	22,010	201	7,400,430	77.0	3,447,323	00.0	7,400,400	
2.1 Issuer Obligations	498,846					498,846	3.0			498.846	
2.2 Single Class Mortgage-Backed /Asset Backed Securities						,100,040				,00,040	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
2.3 Defined											
2.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
2.5 Defined											
2.6 Other											
2.7 Totals	498,846	·				498,846	3.0			498,846	·
U.S. States, Territories and Possessions, Guaranteed 3.1 Issuer Obligations											
3.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
3.3 Defined											
3.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
3.5 Defined											
3.6 Other											
3.7 Totals											
U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed 4.1 Issuer Obligations											
4.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES: 4.3 Defined											
4.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
4.5 Defined											
4.6 Other											
4.7 Totals											
5. U.S. Special Revenue & Special Assessment Obligations etc., Non-Guaranteed						1					
5.1 Issuer Obligations						ļ ļ					
5.2 Single Class Mortgage-Backed /Asset Backed Securities	74,702	147,046	73,984	108,644	27,082	431,458	2.6	522,055	3.3	431,458	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
5.3 Defined	95,799	2,281,340	2,293,227			4,670,366	28.0	286,984	1.8	4,670,366	
5.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES: 5.5 Defined											
5.5 Defined											
5.6 Other	170.501	2.428.386	2.367.211	108.644	27.082	5.101.824	30.6	809.039	5.1	5.101.824	
3./ TOTAIS	1/0,501	2,428,386	2,367,211	108,644	27,082	5, 101,824	30.6	809,039	5.1	5, 101,824	

SCHEDULE D - PART 1A - SECTION 2 (Continued) Maturity Distribution of All Bonds Owned December 31, at Book/Adjusted Carrying Values by Major Type and Subtype of Issues

Mat	urity Distribution of	f All Bonds Owne	ed December 31,	at Book/Adjusted	Carrying Values	by Major Type and	d Subtype of Issu				
Distribution by Type	1 Year or Less	2 Over 1 Year Through 5 Years	3 Over 5 Years Through 10 Years	4 Over 10 Years Through 20 Years	5 Over 20 Years	6 Total Current Year		8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed
6. Industrial and Miscellaneous	1 Total of Ecss	Thiough 5 Tours	Through to Tours	Through 20 Tours	Over 20 rears	Total Odifont Total	Line 10.7	T HOL T CAI	THOI TOU	Traded	i iacca
6.1 Issuer Obligations	726,762	1,250,727	246,750	1,182,718		3,406,957	20.5	5,235,550	33.2	3,406,957	
6.2 Single Class Mortgage-Backed /Asset Backed Securities		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		,		,,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
6.3 Defined											
6.4 Other	92,834	91,450				184,284	1.1	270,245	1.7	184,284	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES: 6.5 Defined	,	,				,				,	
6.6 Other											
6.7 Totals	819,596	1,342,177	246,750	1,182,718		3,591,241	21.6	5,505,795	34.9	3,591,241	
7. Credit Tenant Loans	010,000	1,042,177	240,730	1,102,710		0,001,241	21.0	3,000,700	04.0	0,001,241	
7.1 Issuer Obligations											
7.2 Single Class Mortgage-Backed Securities											
7.7 Totals											
8. Hybrid Securities											
8.1 Issuer Obligations											
8.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
8.3 Defined											
8.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES: 8.5 Defined											
8.6 Other											
8.7 Totals	-										
Parent, Subsidiaries and Affiliates											
9.1 Issuer Obligations											
9.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:	-										
9.3 Defined											
9.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES:											
9.5 Defined											
9.6 Other											
9.7 Totals											

SCHEDULE D - PART 1A - SECTION 2 (Continued) Maturity Distribution of All Bonds Owned December 31, at Book/Adjusted Carrying Values by Major Type and Subtype of Issues

Ma	turity Distribution of		ed December 31,		Carrying Values	by Major Type and	d Subtype of Issu				
	1	2	3	4	5	6	7	8	9	10	11
Distribution by Torre	4. ٧	Over 1 Year	Over 5 Years	Over 10 Years	0	T-t-1 O	Col. 6 as a % of Line 10.7	Total from Col. 6 Prior		Total Publicly	Total Privately
Distribution by Type	1 Year or Less	Through 5 Years	Through 10 Years	Through 20 Years	Over 20 Years	Total Current Year	Line 10./	Year	Prior Year	Traded	Placed
10. Total Bonds Current Year	0.004.074	4,543,807	246.750	1,182,718		9.934.346	59.7	XXX	VVV	0.004.046	
10.1 Issuer Obligations		913.814	234 . 148	1, 182, 718	27.363	1.863.373	59.7		XXX XXX	9,934,346 1.863.373	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:		913,614	234, 140		21,303		11.2		XXX	1,003,3/3	
10.3 Defined	95,799	2.281.340	2.293.227			4.670.366	28.0	VVV	XXX	4.670.366	
10.4 Other	92,834	2,281,340 91.450	2,293,221			184.284	1.1		XXX	184.284	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED	92,034	91,430				104,204		XXX	XXX	104,204	
SECURITIES:											
10.5 Defined								XXX	XXX		
10.6 Other								XXX	XXX		
10.7 Totals	4,706,533	7,830,411	2,774,125	1,313,937	27,363	16,652,369	100.0	XXX	XXX	16,652,369	
10.8 Line 10.7 as a % of Col. 6	28.3	47.0	16.7	7.9	0.2	100.0	XXX	XXX	XXX	100.0	
11. Total Bonds Prior Year		<u> </u>			·				· · · · · · · · · · · · · · · · · · ·		
11.1 Issuer Obligations	2,384,407	8,036,804	989,516	1,225,599		XXX	XXX	12,636,326	80.2	12,636,326	
11.2 Single Class Mortgage-Backed /Asset Backed Securities			498,973	514,332	355,618	XXX	XXX	2,569,204	16.3	2,569,203	1
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
11.3 Defined	60,915	189,893	36, 176			XXX	XXX	286,984	1.8	286,985	(1
11.4 Other	150, 166	120,079				XXX	XXX	270,245	1.7	270,245	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
11.5 Defined						XXX	XXX	-			
11.6 Other						XXX	XXX				
11.7 Totals	2,957,613	9, 184, 932	1,524,665	1,739,931	355,618	XXX	XXX	15,762,759	100.0	15,762,759	
11.8 Line 11.7 as a % of Col. 8	18.8	58.3	9.7	11.0	2.3	XXX	XXX	100.0	XXX	100.0	
12. Total Publicly Traded Bonds											
12.1 Issuer Obligations		4,543,807	246,750	1, 182,718		9,934,346	59.7	12,636,326	80.2	9,934,346	XXX
12.2 Single Class Mortgage-Backed /Asset Backed Securities		913,814	234 , 148	131,219	27,363	1,863,373	11.2	2,569,203	16.3	1,863,373	XXX
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
12.3 Defined	95,799	2,281,340	2,293,227			4,670,366	28.0		1.8	4,670,366	XXX
12.4 Other	92,834	91,450				184,284	1.1	270,245	1.7	184,284	XXX
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
12.5 Defined											XXX
12.6 Other	4 700 500	7 000 111	0.774.205	1 010 000	A7 666	40.050.000	1000	45 700 750	100.0	40.050.000	XXX
12.7 Totals	4,706,533	7,830,411	2,774,125	1,313,937	27,363	16,652,369	100.0		100.0	16,652,369	XXX
12.8 Line 12.7 as a % of Col. 6		47.0 47.0	16.7 16.7	7.9 7.9	0.2 0.2	100.0 . 100.0	XXX	XXX	XXX	100.0 100.0	XXX
12.9 Line 12.7 as a % of Line 10.7, Col. 6, Section 10	20.3	47.0	10.7	7.9	0.2	100.0	XXX	XXX	XXX	100.0	XXX
13. Total Privately Placed Bonds 13.1 Issuer Obligations										xxx	
13.2 Single Class Mortgage-Backed /Asset Backed Securities								1	0.0	XXX	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES: 13.3 Defined								(1)	0.0	2007	
								(1)		XXX	
13.4 Other										XXX	
13.5 Defined										XXX	
13.6 Other										XXX	
13.7 Totals										XXX	
											[
13.8 Line 13.7 as a % of Col. 6							XXX	XXX	XXX	XXX	

SCHEDULE DA - VERIFICATION BETWEEN YEARS

Short-Term Investments

Short-remi investi	1	2	3	4	5
	Total	Bonds	Mortgage Loans	Other Short-term Investment Assets (a)	Investments in Parent, Subsidiaries and Affiliates
Book/adjusted carrying value, December 31 of prior year	369,696	369,696			
Cost of short-term investments acquired	5,308,321	5,308,321			
3. Accrual of discount					
Unrealized valuation increase (decrease)					
5. Total gain (loss) on disposals					
6. Deduct consideration received on disposals	5,451,220	5,451,220			
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)	226,797	226,797			
11. Deduct total nonadmitted amounts					
12. Statement value at end of current period (Line 10 minus Line 11)	226,797	226,797			

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

Schedule DB - Part A - Verification - Options, Caps, Floors, Collars, Swaps and Forwards NONE

Schedule DB - Part B - Verification - Futures Contracts
NONE

Schedule DB - Part C - Section 1 - Replication (Synthetic Asset) Transactions (RSATs) Open NONE

Schedule DB-Part C-Section 2-Reconciliation of Replication (Synthetic Asset) Transactions Open NONE

Schedule DB - Verification - Book/Adjusted Carrying Value, Fair Value and Potential Exposure of Derivatives

NONE

Schedule E - Verification - Cash Equivalents

NONE

Schedule A - Part 1 - Real Estate Owned NONE

Schedule A - Part 2 - Real Estate Acquired and Additions Made NONE

Schedule A - Part 3 - Real Estate Disposed NONE

Schedule B - Part 1 - Mortgage Loans Owned NONE

Schedule B - Part 2 - Mortgage Loans Acquired and Additions Made NONE

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

NONE

Schedule BA - Part 1 - Other Long-Term Invested Assets Owned NONE

Schedule BA - Part 2 - Other Long-Term Invested Assets Acquired and Additions Made NONE

Schedule BA - Part 3 - Other Long-Term Invested Assets Disposed, Transferred or Repaid NONE

SCHEDULE D - PART 1

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

								Showing All Lor	ng-Term BOND:	S Owned Decer	mber 31 of (Current Ye	ar								
1	2		Codes	3	6	7		Fair Value	10	11	Change	in Book/Adi	usted Carryin	g Value			Ir	nterest		Da	tes
•		3	4	5	-		8	9			12	13	14	15	16	17	18	19	20	21	22
		ľ		ŭ			ŭ	Ĭ						Total				. •			
														Foreign							
			_											0							
			F										Current	Exchange							
			0										Year's	Change							
			r				Rate					Current	Other	in							
		С	е				Used to			Book/	Unrealized	Year's	Than	Book/				Admitted			
		0	i I				Obtain			Adjusted	Valuation	(Amor-	Temporary	Adjusted		Effective		Amount	Amount		
CUSIP		ď	ر ا	Bond	NAIC	Actual	Fair	Fair	Par	Carrying	Increase/	tization)	Impairment	Carrying	Rate		When	Due and	Received		
	Description	_																		المعينية م	Moturity
Identification	Description	е	n	Char	Des.	Cost	Value	Value	Value	Value	(Decrease)	Accretion	Recognized	Value	of	of	Paid	Accrued	During Year	Acquired	Maturity
912828-BH-2	US Treasury NOTES	SD		-	1	1,338,852	.108.8750	1,469,813	1,350,000	1,346,420		1,262			4.250	4.358	FA	21,672	57,375	04/30/2004	08/15/2013
	US Treasury NOTES	SD			1		_111.6950	167,543	150,000	151,282		(345)			4.750	4.474	MN	925	7 , 125	07/06/2004	05/15/2014
912828-FA-3	US Treasury	SD			1		101.0900	237,561	235,000	234,955		181			4.750		MS	2,852	11, 163	04/04/2006	03/31/2011
912828-FS-4	US Treasury						_102.8670	2,057,344	2,000,000	2,001,113		(1,627)			4.625	4.538	FA	31,430	92,500	09/27/2006	08/31/2011
912828-GC-8	US Treasury				1	497,266		521, 172	500,000	499,396		578			4.625	4.751		64	23 , 125	02/07/2007	12/31/2011
912828-GQ-7	US Treasury	SD		-		888,961		949,535	900,000	896,780		2,296			4.500	4.781		6,936	40,500	05/24/2007	04/30/2012
	US Treasury					298,652		319,817	300,000	299,561		276			4.875	4.978		40	14,625	06/28/2007	06/30/2012
	US Treasury US TREASURY N/B	SD				598,031		633,844	600,000	599,036		393			3.125	3.197		3,211	18,750	05/27/2008	04/30/2013
	Governments - Issuer Obligations					6,016,691		6,356,629	6,035,000	6,028,543		3,014			XXX	XXX	XXX	67,130	265,163	XXX	XXX
	Government National Mortgage A POOL 724266		2		1		108.1710		807,309	845,224		(333)			5.500	3.410		3,700	44,402	09/23/2009	09/15/2039
	GNM 2009-20 A POOL 726376		2		1		106.3850	389,803	366,408	382,809		(240)			5.000	2.744		1,527	18,320	11/20/2009	10/15/2039
36295N-NM-5	Government National Mortgage A POOL 675496		2		1	204,049	_112.7830	223,294	197,985	203,882		16			6.500	5.089	MON	1,072	12,869	08/08/2008	06/15/2038
0299999. U.S	S. Governments - Single Class Mortgage-	-Backe	ed/Asse	t-Backe	d																
Se	curities					1,432,899	XXX	1,486,374	1,371,702	1,431,915		(557)			XXX	XXX	XXX	6,299	75,591	XXX	XXX
0399999 Tot	tal - U.S. Government Bonds					7.449.590	XXX	7,843,003	7.406.702	7.460.458		2,457			XXX	XXX	XXX	73,429	340,754	XXX	XXX
	INTER AMERICAN DEVELOPMENT BNK		F		1FE	445,460			500,000	498.846		5,488			8.500	9,700	MS	12.514	42,500	09/06/1988	03/15/2011
	Other Governments - Issuer Obligations					445,460	XXX	507,889	500,000	498.846		5.488			XXX	XXX	XXX	, .	,	XXX	XXX
								,										12,514	42,500		
	tal - All Other Government Bonds					445,460		507,889	500,000	498,846		5,488			XXX	XXX	XXX	12,514	42,500	XXX	XXX
	al - U.S. States, Territories and Possess	ions B	onds				XXX								XXX	XXX	XXX			XXX	XXX
2499999. Tot	tal - U.S. Political Subdivisions Bonds						XXX								XXX	XXX	XXX			XXX	XXX
31297A-5B-6	FHLMC POOL #A23542		2		1	200,437	.103.1620	224,337	217,460	201,072		(115)			4.500	8.138		815	9,786	06/10/2004	06/01/2034
31401W-TE-9	FNMA POOL #720649		2		1	225,914	_100.0800	256, 197	255,993	230,386		473			4.000	5.267	MON	853	10,240	06/10/2004	05/01/2033
2699999. U.S	S. Special Revenues - Single Class Morto	gage-B	acked/	Asset-B	acked																
	curities	33-				426.351	XXX	480.534	473.453	431.458		358			XXX	XXX	XXX	1.668	20.026	XXX	XXX
	FHLMC REMIC SER 2791 OB (SEQ-NAS)		2		1	228,016		247,423	234, 463	231, 134		324			4.500	5.420		879	10,551	06/10/2004	05/15/2033
	GNMA GNR 2010-93 GP		2		1	1,493,164		1,405,608	1,390,000	1,490,109		(3,055)			4.500	3.392		5,213	10,425	09/28/2010	11/20/2019
	GNMA GNR 2010-60 QG		2		1	2,284,800			2,240,000	2,278,925		(5,875)			4.500	4.005		8,400	58,800	05/19/2010	03/20/2016
	GNMA SERIES 2010-114 CLASS NB		2		1	670,600	100.8450	645,409	640,000	670, 198		(402)			4.500	3.816	MON	2,400	2,400	11/15/2010	03/20/2020
2799999. U.S	S. Special Revenues - Defined Multi-Clas	s Resi	dential	Mortgac	ie-																
	cked Securities			33	,-	4,676,580	XXX	4,603,613	4,504,463	4,670,366		(9,008)			XXX	XXX	XXX	16.892	82,176	XXX	XXX
	tal - U.S. Special Revenues Bonds					5,102,931		5,084,147	4.977.916	5, 101, 824		(8,650)			XXX	XXX	XXX	18.560	102,202	XXX	XXX
035229-CV-3	ANHEUSER-BUSCH CO NTS	1 1		1	2FE	5, 102, 931			4,977,916	5,101,824		468			5.050	5.314		2,665	102,202	07/06/2004	10/15/2016
097023-AM-7	Boeing Co DEBS				2FE	459,950		479,218		246,750		(2, 197)			7.250	5.903		1,273	28,638	07/06/2004	06/15/2025
10138M-AD-7	BOTTLING GROUP LLC UNSEC'D SR NTS SER B				1FE	226,938		266,867	250,000	239,019					4.125	5.244		458	10,313	07/06/2004	06/15/2015
494368-AS-2	KIMBERLY CLARK CORP NTS				1FE	321,384			280,000	313,756		(1,201)			6.375	5.291		8,925	17,850	07/00/2004	01/01/2028
59018Y-SU-6	MERRILL LYNCH & CO UNSUB SR NTS SER C				1FE	517,745		517,455	500,000	516,730		(1,201)			5.000	4.548		10,278	25,000	03/24/2004	02/03/2014
74955D-AB-7	AEP GENERATING CO		2		2FE	418,657		484,064	433,047	422,708		431			9.820	10.170		2,835	42,525	09/05/1990	12/07/2022
852060-AJ-1	SPRINT CAP CORP NOTES				3FE		_100.2500	501,250	500,000	499,965		437			7.625	7.718		15,991	38, 125	01/18/2001	01/30/2011
90333W-AC-2	US BANK NA SUB NTS				1FE		_107.8340	539.170	500,000	505.263		(1.090)			4.800	4.527		5.067	24.000	03/25/2004	04/15/2015
	ustrial and Miscellaneous (Unaffiliated) -	Issuer	Oblinat	tions		3,197,297	XXX	3,373,595	3,108,047	3,180,160		(2,917)			XXX	XXX		47,492	199,076	XXX	XXX
	MASTER ASSET SECURITIZATION 2006-3 1A10	1	Jongai	T	27*	185, 279			184,300	184,284		(52)			6.000	5.693		922	11.054	01/11/2007	06/25/2013
	ustrial and Miscellaneous (Unaffiliated) -	Other	Multi-C	lace Ro				100,009				(32)							11,034	1/ 11/ 2007	
		Other	widiti-C	iass ne:	Siderillal	185.279	XXX	183.659	184.300	184.284		(52)			XXX	XXX	XXX	922	11.054	XXX	XXX
	ortgage-Backed Securities								. ,	. , .		. ,							,		
	al - Industrial and Miscellaneous (Unaffili	iated) l	Bonds			3,382,576		3,557,254	3,292,347	3,364,444		(2,969)			XXX	XXX	XXX	48,414	210, 130	XXX	XXX
	tal - Credit Tenant Loans						XXX								XXX	XXX	XXX			XXX	XXX
4899999. Tot	al - Hybrid Securities						XXX								XXX	XXX	XXX			XXX	XXX
5599999. Tot	tal - Parent, Subsidiaries and Affiliates Bo	onds					XXX								XXX	XXX	XXX			XXX	XXX
	tal - Issuer Obligations					9,659,448	XXX	10,238,113	9,643,047	9,707,549		5,585			XXX	XXX	XXX	127, 136	506,739	XXX	XXX
	tal - Single Class Mortgage-Backed/Asse	t Back	od Soo	urition		1.859.250	XXX	1.966.908	1.845.155	1.863.373		(199)			XXX	XXX	XXX	7.967	95.617	XXX	XXX
						, ,		, ,		, ,		, ,						, , , , , , , , , , , , , , , , , , , ,			
7999999. Tot	tal - Defined Multi-Class Residential Mort	gage-E	3acked	Securiti	es	4,676,580	XXX	4,603,613	4,504,463	4,670,366		(9,008)			XXX	XXX	XXX	16,892	82,176	XXX	XXX

SCHEDULE D - PART 1

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

1	2		Codes	6	6	7	F	air Value	10	11	Change	in Book/Ad	usted Carryin	g Value			Ir	nterest		Da	tes
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
														Total							
														Foreign							
			F										Current	Exchange							
			0										Year's	Change							
			r				Rate					Current	Other	in							
		С	е				Used to			Book/	Unrealized	Year's	Than	Book/				Admitted			
		0	i				Obtain			Adjusted	Valuation	(Amor-	Temporary	Adjusted		Effective		Amount	Amount		
CUSIP		d		Bond	NAIC	Actual	Fair	Fair	Par	Carrying	Increase/	tization)	Impairment	Carrying	Rate	Rate	When	Due and	Received		
Identification	Description	е	n	Char	Des.	Cost	Value	Value	Value	Value	(Decrease)	Accretion	Recognized	Value	of	of	Paid	Accrued	During Year	Acquired	Maturity
8099999. Tota	al - Other Multi-Class Residential Mor	tgage-Bac	ked Se	ecuritie	S	185,279	XXX	183,659	184,300	184,284		(52)			XXX	XXX	XXX	922	11,054	XXX	XXX
8199999. Tota	al - Defined Multi-Class Commercial N	/lortgage-E	Backec	d Secur	ities		XXX								XXX	XXX	XXX			XXX	XXX
8299999. Tota	al - Other Multi-Class Commercial Mo	rtgage-Ba	cked/A	Asset-B	acked																
Sec	curities						XXX								XXX	XXX	XXX			XXX	XXX
8399999 - To	tal Bonds					16,380,557	7 XXX	16,992,293	16,176,965	16,425,572		(3,674)			XXX	XXX	XXX	152,917	695,586	XXX	XXX

Schedule D - Part 2 - Section 1 - Preferred Stocks Owned $\stackrel{\textstyle N}{}$ $\stackrel{\textstyle O}{}$ $\stackrel{\textstyle N}{}$ $\stackrel{\textstyle E}{}$

Schedule D - Part 2 - Section 2 - Common Stocks Owned NONE

SCHEDULE D - PART 3

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

1 2	3	4	5	6	7	8	9
							Paid for Accrued
CUSIP		Date		Number of Shares			Interest and
Identification Description	Foreign	Acquired	Name of Vendor	of Stock	Actual Cost	Par Value	Dividends
38374Y-CZ-4 GNIMA GNR 2010-93 GP 4.500% 02/20/39			Nomura Securities Int'l, Inc.		1,493,164	1,390,000	
38377E-K3-7 GNNA GNR 2010-60 QG 4.500% 03/20/39			Mizuho Securities		2,284,800	2,240,000	7,560
38377K-AD-2 GNMA SERIES 2010-114 CLASS NB 4.500% 06/20/39		11/15/2010	Citibank Mortgages		670,600	640,000	1,360
3199999. Bonds - U.S. Special Revenues					4,448,564	4,270,000	8,920
8399997. Total - Bonds - Part 3					4,448,564	4,270,000	8,920
8399998. Total - Bonds - Part 5							
8399999. Total - Bonds					4,448,564	4,270,000	8,920
8999997. Total - Preferred Stocks - Part 3						XXX	
8999998. Total - Preferred Stocks - Part 5						XXX	
8999999. Total - Preferred Stocks						XXX	
9799997. Total - Common Stocks - Part 3						XXX	
9799998. Total - Common Stocks - Part 5						XXX	
9799999. Total - Common Stocks						XXX	
9899999. Total - Preferred and Common Stocks						XXX	
				ļ			
		· · · · · · · · · · · · · · · · · · ·					
9999999 - Totals				h	4,448,564	XXX	8,920

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

					Showing All Lo	ong-Term E	Bonds and Sto	ocks SOLD, I	REDEEMED	or Otherwis	se DISPOS	ED OF Dur	ing Current '	Year						
1	2	3	4	5	6	7	8	9	10	(Change In Bo	ok/Adjusted (Carrying Value)	16	17	18	19	20	21
										11	12	13	14	15						
														Total						
												Current	Total	Foreign					Bond	
												Year's	Change in	Exchange	Book/				Interest/	
									Prior Year		Current	Other	Book/	Change in	Adjusted	Foreign			Stock	
									Book/	Unrealized	Year's	Than	Adjusted	Book/	Carrying	Exchange			Dividends	
CUSIP					Number of				Adjusted	Valuation	(Amor-	Temporary	Carrying	Adjusted	Value at	Gain	Realized	Total Gain	Received	
Identi-		For-	Disposal	Name	Shares of	Con-			Carrying	Increase/	tization)/	Impairment	Value	Carrying	Disposal	(Loss) on G	ain (Loss)	(Loss) on	During	Maturity
fication	Description	eign	Date	of Purchaser	Stock	sideration	Par Value	Actual Cost	Value	Decrease	Accretion	Recognized		Value	Date	Disposal o	n Disposal	Disposal	Year	Date
	Government National Mortgage A POOL 724266																•			
3620AA-TX-6	. 5.500% 09/15/39		12/01/2010 .	Paydown		359,418	359,419	376,548	376,447		(17,028)		(17,028)		359,419				11,363	09/15/2039
	GNM 2009-20 A POOL 726376 5.000%																			
3620AC-6M-1	_ 10/15/39 Government National Mortgage A POOL 675496		12/01/2010 .	Paydown		131,984	131,984	137,986	137,979		(5,994)		(5,994)		131,984				4,/03	10/15/2039
36295N-NM-5	6.500% 06/15/38		12/01/2010 _	Paydown		97,360	97,360	100,341	100,252		(2,892)		(2,892)		97,360				2 806	06/15/2038
	US Treasury 4.500% 05/15/10		1.05/15/2010			1.000.000	1.000.000	1.035.547	1,005,552		(5,552)		(5,552)		1.000.000					05/15/2010
	Bonds - U.S. Governments		4.20/ 10/2010 .			1,588,762	1,588,763	1,650,422	1,620,230		(31,466)		(31,466)		1,588,763				41,462	
	FHLMC POOL #A23542 4.500% 06/01/34		12/01/2010 _	Pavdown			88,161	81,260	81,564		6.597		6.597							06/01/2034
	FHLMC REMIC SER 2791 OB (SEQ-NAS) 4.500%			•			·	,	,		, , , ,									
31394Y-KH-6	05/15/33		12/01/2010 _			57,063	57,063	55,493	56, 174		889		889		57,063					05/15/2033
	FNMA POOL #720649 4.000% 05/01/33		12/01/2010 .	Paydown		10,456			9,390		1,065		1,065		10,456					05/01/2033
3199999.	Bonds - U.S. Special Revenues			T		155,680	155,680	145,980	147, 128		8,551		8,551		155,680				4,474	XXX
400044 10 7	BURLINGTON RESOURCES DEBS 9.875%		00/45/0040			500.000	500 000		507 440		(7.440)		(7.440)		500.000				04.000	00/45/0040
122014-AC-7	MASTER ASSET SECURITIZATION 2006-3 1A10		06/15/2010 .	. Maturity		500,000	500,000	609,390	507, 112		(7, 112)		(7, 112)		500,000				24,688	06/15/2010
55274S-AK-7	6.000% 10/25/36		12/01/2010 .	Pavdown		85.891	85.891		85.908		(16)		(16)		85.892		(2)	(2)	2 764	06/25/2013
002140 /110 /	0.000% 10/20/00		1	Redemption									(10)				(2)			
74955D-AB-7	AEP GENERATING CO 9.820% 12/07/22		12/07/2010 _			40,931	40,931	39,571	39,913		28		28		39,941		990	990	3,087	12/07/2022
	UNITED TECHNOLOGIES UNSEC'D NTS 6.350%																			
913017-BD-0	. 03/01/11		09/30/2010 _	_ Call 102.5027		512,513	500,000	560,000	510,044		(6,360)		(6,360)		503,684		8,829	8,829	34,308	03/01/2011
070005 40 0	TELEFONICA EUROPE BV GLOBAL 7.750% 09/15/10	_	09/15/2010 _	W 4 14		500.000	500,000	520,905	502,046		(2,046)		(2,046)		500,000				00.750	09/15/2010
879385-AC-6	Bonds - Industrial and Miscellaneous	/Llmof		_maturity		1.639.335	1.626.822	1.816.213	1,645,023		(15,506)		(15,506)		1.629.517		9.817	9.817	103,597	
	Total - Bonds - Part 4	(Unai	illiated)			3,383,777	3,371,265	3,612,615	3,412,381		(38,421)				3.373.960		9,817	- 7.	149,533	
	Total - Bonds - Part 5					3,383,777	3,3/1,265	3,612,615	3,412,381		(38,421)		(38,421)		3,3/3,960		9,817	9,817	149,533	XXX
						0.000.777	0.074.005	0.040.045	0.440.004		(00, 404)		(00, 404)		0.070.000		0.047	0.047	440.500	
8399999.	Total - Bonds REGIONS FINANCIAL ASSET MGMT 8.44% PFD	1	1	Redemption		3,383,777	3,371,265	3,612,615	3,412,381		(38,421)		(38,421)		3,373,960		9,817	9,817	149,533	XXX
75013V_30_1	4/30/10 (144A)		.04/30/2010		500,000	500.000	0.00	481.952	498.650		1.350		1.350		500.000				21, 100	
	Preferred Stocks - Industrial and Misc	ellane				500,000		481,952	498,650		1,350		1,350		500,000				21,100	
	Total - Preferred Stocks - Part 4	Chan	cous (onam	matou)		500,000	XXX	481.952	498,650		1,350		1,350		500,000				21,100	
	Total - Preferred Stocks - Part 5					300,000	XXX	401,332	450,030		1,000		1,550		300,000				21,100	XXX
	Total - Preferred Stocks					500.000		481.952	498.650		1.350	1	1.350		500.000				21,100	
	Total - Common Stocks - Part 4					500,000	XXX	401,932	480,000		1,300		1,350		300,000				21,100	XXX
							XXX													XXX
	Total - Common Stocks - Part 5 Total - Common Stocks						XXX													XXX
											,		,							
	Total - Preferred and Common Stocks	S				500,000	XXX	481,952	498,650		1,350		1,350		500,000				21,100	
9999999 -	I otals					3,883,777	XXX	4,094,567	3,911,031		(37,071)		(37,071)		3,873,960		9,817	9,817	170,633	XXX

Schedule D - Part 5 - Long Term Bonds and Stocks Acquired and Fully Disposed Of ${\sf N} \; {\sf O} \; {\sf N} \; {\sf E}$

Schedule D-Part 6-Section 1-Valuation of Shares of Subsidiary, Controlled or Affiliated Companies $N\ O\ N\ E$

Schedule D - Part 6 - Section 2 NONE

SCHEDULE DA - PART 1

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

1	2	Code	s	5	6	7 7	8			usted Carryin		13	14			Intere	est			21
1 '	_	3	4	ŭ	ŭ	,		9	10	11	12	.0		15	16	17	18	19	20	
			-					Ŭ	10		Total			10	10	.,	10	10	20	
										Current	Foreign			Amount Due						
										Year's	Exchange			and Accrued						
									Current	Other	Change in			Dec. 31 of						
							Book/	Unrealized	Year's	Than	Book/			Current	Non-				Amount	
CUSIP							Adjusted	Valuation	(Amor-	Temporary	Adjusted			Year on	Admitted		Effective		Received	Paid for
Identi-			For-	Date		Maturity	Carrying	Increase/	tization)/	Impairment	Carrying			Bonds not	Due and	Rate	Rate	When	During	Accrued
fication	Description	Code	eign	Acquired	Name of Vendor	Date	Value	(Decrease)	Accretion	Recognized	Value	Par Value	Actual Cost	in Default	Accrued	of	of	Paid	Year	Interest
	Total - U.S. Government Bonds															XXX	XXX	XXX		
	Total - All Other Government Bon															XXX	XXX	XXX		
	Total - U.S. States, Territories and															XXX	XXX	XXX		
	Total - U.S. Political Subdivisions		tories a	and Possession	ns Bonds											XXX	XXX	XXX		
	Total - U.S. Special Revenues Bo															XXX	XXX	XXX		
	Total - Industrial and Miscellaneou	us Bonds (Unaf	filiated))												XXX	XXX	XXX		
	Total - Credit Tenant Loans															XXX	XXX	XXX		
	Total - Hybrid Securities															XXX	XXX	XXX		
5599999. 7	Total - Parent, Subsidiaries and A	ffiliates Bonds														XXX	XXX	XXX		
	Total - Issuer Obligations															XXX	XXX	XXX		
	Total - Single Class Mortgage-Bad															XXX	XXX	XXX		
	Total - Defined Multi-Class Reside															XXX	XXX	XXX		
	Total - Other Multi-Class Resident															XXX	XXX	XXX		
8199999. 7	Total - Defined Multi-Class Comm	ercial Mortgage	e-Back	ed Securities												XXX	XXX	XXX		
	Total - Other Multi-Class Commer	cial Mortgage-E	Backed	l/Asset-Backed	d Securities											XXX	XXX	XXX		
8399999. 7	Total Bonds															XXX	XXX	XXX		
8699999. 7	Total - Parent, Subsidiaries and A	ffiliates			·							XXX				XXX	XXX	XXX		
	JP MORGAN OVERNIGHT SWEEP			.12/31/2010 Vari	ious	XXX	226,797						226,797			0.000	0.000	MON	68	
8999999. 0	Class One Money Market Mutual	Funds					226,797					XXX	226,797			XXX	XXX	XXX	68	
												····								
										<u> </u>						2001	\0.07			
9199999 -	Lotais						226 797			1	1	XXX	226 797	1	1	XXX	XXX	XXX	68	I

Schedule DB - Part A - Section 1 - Options, Caps, Floors, Collars, Swaps and Forwards Open NONE

Schedule DB - Part A - Section 2 - Options, Caps, Floors, Collars, Swaps and Forwards Terminated NONE

Schedule DB - Part B - Section 1 - Futures Contracts Open \overline{N} \overline{O} \overline{N} \overline{E}

Schedule DB - Part B - Section 1B - Brokers with whom cash deposits have been made $N\ O\ N\ E$

Schedule DB - Part B - Section 2 - Futures Contracts Terminated $\stackrel{\textstyle \bullet}{\mathsf{N}} \stackrel{\textstyle \bullet}{\mathsf{O}} \stackrel{\textstyle \bullet}{\mathsf{N}} \stackrel{\textstyle \bullet}{\mathsf{E}}$

Schedule DB - Part B - Section 2B - Brokers with whom cash deposits have been made ${\sf NONE}$

Schedule DB - Part D - Counterparty Exposure for Derivative Instruments Open NONE

Schedule DL - Part 1 - Reinvested Collateral Assets Owned \overline{N} \overline{O} \overline{N} \overline{E}

Schedule DL - Part 2 - Reinvested Collateral Assets Owned NONE

SCHEDULE E - PART 1 - CASH

JOHEDOL		1 711				
1	2	3 Rate of	4 Amount of Interest	5 Amount of Interest Accrued December 31	6	7
Depository	Code		Received During Year	of Current Year	Balance	*
Bank of America		intoroot	roai	or carrone rear	30,914	XXX
JPMorgan New York, NY					(2,012)	
0199998 Deposits in depositories which do not exceed the allowable limit in any one depository (See instructions) - open						
depositories	XXX	XXX				XXX
0199999. Totals - Open Depositories	XXX	XXX			28,902	XXX
0299998 Deposits in depositories which do not exceed the allowable limit in any one depository (See instructions) - suspended	2004	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\				\0.07
depositories 0299999. Totals - Suspended Depositories	XXX	XXX				XXX
0399999. Total Cash on Deposit	XXX	XXX			28,902	
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX	20,002	XXX
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0599999 Total - Cash	XXX	XXX			28,902	XXX
10000000 101d1 - 0a511		_ ^^^		1	20,902	_^^^

TOTALS OF DEPOSITORY BALANCES ON THE LAST DAY OF EACH MONTH DURING THE CURRENT YEAR

		TOTALS OF DEF	03110	NI DALA	INCES ON THE LAS	I DAI	OF EACH IV	IONTITI DUNING TITI	L CON	NENI IEAN	<u> </u>
1.	January	22,512	4.	April	534,235	7.	July	27,200	10.	October	33,151
2.	February	14,298	5.	May	21,775	8.	August	34,664	11.	November	9,715
3	March	30 558	6	June	27 724	a	Sentember	47 352	12	December	28 902

8699999 - Total Cash Equivalents

ANNUAL STATEMENT FOR THE YEAR 2010 OF THE Symetra National Life Insurance Company

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investmen	nts Owned	d December 31 of 0	Current Year				
1 Description	2 Code	3 Date Acquired	4 Rate of Interest	5 Maturity Date	6 Book/Adjusted Carrying Value	7 Amount of Interest Due and Accrued	8 Amount Received During Year
	.						-
	-						
	-						
	-						
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SCHEDULE E - PART 3 - SPECIAL DEPOSITS

States Elic				DOLL E - PARTI 3 - SI	Donosit			
State Etc. Typo of			1	2			All Other Spe	cial Deposits
States Etc. Deposit Purpose of Deposit Carrying Value Fair Value Carrying Value AL				_	3		5	6
1. Alabama							Book/Adjusted	
2. Alaska		•		Purpose of Deposit	Carrying Value	Fair Value	Carrying Value	Fair Value
3. AirCria AZ								
4. Alancase								
5. California CA Colorado CO COlorado C	3.	Arizona	۱Z					
6. Colorado CO 7. Comecicul CT 8. Delaware DE 9. District of Columbia DC 11. Garogia GA B. Life Insurance 9. Spirit of Columbia DC 11. Garogia GA B. Life Insurance 9. Spirit of Columbia DC 11. Garogia GA B. Life Insurance 9. Spirit of Columbia DC 12. Hawaii H. H. Spirit of Columbia DC 13. Indiana II. Spirit of Columbia DC 14. Bilmois II. Spirit of Columbia DC 15. Indiana II. Spirit of Columbia DC 16. Icowa II. Spirit of Columbia DC 17. Kansas KS 18. Kentucky KY 19. Louistana L. A. D. Spirit of Columbia DC 18. Maine ME 19. Maryland MD 19. Maine MB 19	4.	Arkansas	ιR					
6. Colorado	5.	California	Α					
7. Commercial CT	6.		0					
B. Delaware DE	7	Connecticut						
9. District of Columbia DC								
10. Florida								
11. Georgia GA B Life Insurance								
12 Hawaii								
13.		•		Life Insurance			49,821	52,752
14. Illinois	12.	Hawaii	HI					
15. Indiana	13.	Idaho	ID					
16 lowa	14.	Illinois	JL					
17. Kansas	15.	Indiana	IN					
18. Kentucky	16.	lowa	IA					
18. Kentucky KY 19. Louisiana LA LA LA LA LA LA LA L	17	Kansas	s					
19. Louislana								
20. Maine								
21. Maryland						<u> </u>		
22. Massachusetts								
23. Michigan						}		
24. Minnesota								
25. Mississippi	23.	Michigan	MI					
26. Missouri MO 27. Montana MT 28. Nebraska NE 29. Nevada NV 30. New Hampshire NH 31. New Jersey NJ 32. New Mexico NM 33. New York NY 34. North Carolina NC 35. North Dakota ND 36. Ohio OH 37. Oklahoma OK 38. Oregon OR 39. Pennsylvania PA 40. Rhode Island RI 41. South Carolina SC 42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA 48. Washington WA 49. West Virginia WY 50. Wisconsin WI 51. Us. Virgin Islands VY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR	24.	Minnesota	IN					
26. Missouri	25.	Mississippi	1S					
28. Nebraska	26.	Missouri	ю					
28. Nebraska	27.	Montana M	ıT					
29. Nevada								
30. New Hampshire NH								
31. New Jersey								
32. New Mexico		·						
33. New York NY 34. North Carolina NC B. Life Insurance 400,		<u>-</u>						
34. North Carolina				Life Insurance			149,971	151,635
35. North Dakota								
36. Ohio	34.	North Carolina	ICB	Life Insurance			400,388	431,303
37. Oklahoma	35.	North Dakota	ID					
38. Oregon OR 39. Pennsylvania PA 40. Rhode Island RI 41. South Carolina SC 42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA 48. Washington WA 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN	36.	Ohio	Н					
38. Oregon OR 39. Pennsylvania PA 40. Rhode Island RI 41. South Carolina SC 42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA 48. Washington WA 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN	37.	Oklahoma C	K B	Life Insurance			149,463	158,256
39. Pennsylvania PA 40. Rhode Island RI 41. South Carolina SC 42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA B. Life Insurance 48. Washington WA B. Life Insurance 1,521,261 1,650,816 49. West Virginia WV 50. Wisconsin .WI WI 51. Wyoming WY WY 52. American Samoa AS S 53. Guam GU GU 54. Puerto Rico PR S 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN								
40. Rhode Island RI 41. South Carolina SC 42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA 48. Washington WA 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN		•						
41. South Carolina SC 42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA 48. Washington WA 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN		•						
42. South Dakota SD 43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont .VT 47. Virginia VA 48. Washington WA 49. West Virginia WV 50. Wisconsin .WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN								
43. Tennessee TN 44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA B. Life Insurance 99,1 48. Washington WA B. Life Insurance 1,521,261 1,650,816 49. West Virginia WV WV 50. Wisconsin WI WI 51. Wyoming WY WY 52. American Samoa AS AS 53. Guam GU GU 54. Puerto Rico PR PR 55. U.S. Virgin Islands VI VI 56. Northern Mariana Islands MP MP 57. Canada CN CN								
44. Texas TX 45. Utah UT 46. Vermont VT 47. Virginia VA B Life Insurance 99,1 48. Washington WA B Life Insurance 1,521,261 1,650,816 49. West Virginia WV WV 50. Wisconsin WI WY WY 51. Wyoming WY WY WY 52. American Samoa AS AS S 53. Guam GU GU S 54. Puerto Rico PR PR S 55. U.S. Virgin Islands VI VI S 56. Northern Mariana Islands MP MP S 57. Canada CN CN CN CN								
45. Utah UT 46. Vermont VT 47. Virginia VA 48. Washington WA 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN	43.							
46. Vermont VT 47. Virginia VA B Life Insurance 99, 48. Washington WA B Life Insurance 1,521,261 1,650,816 49. West Virginia WV WV<	44.							
47. Virginia VA B. Life Insurance 99,4 48. Washington WA B. Life Insurance 1,521,261 1,650,816 49. West Virginia WV WI	45.	Utahl	JT					
48. Washington WA B. Life Insurance 1,521,261 1,650,816 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN	46.	Vermont	/T					
48. Washington WA B. Life Insurance 1,521,261 1,650,816 49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN	47.	Virginia\	/AB	Life Insurance			99,839	105,641
49. West Virginia WV 50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN							.,	
50. Wisconsin WI 51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN					, 521,201	, 550, 510		
51. Wyoming WY 52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN								
52. American Samoa AS 53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN						ļ		
53. Guam GU 54. Puerto Rico PR 55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN								
54. Puerto Rico _PR 55. U.S. Virgin Islands _VI 56. Northern Mariana Islands _MP 57. Canada _CN								
55. U.S. Virgin Islands VI 56. Northern Mariana Islands MP 57. Canada CN								
56. Northern Mariana Islands MP 57. Canada CN						ļ		
57. Canada	55.	U.S. Virgin Islands	VI					
	56.	Northern Mariana Islands	1P					
	57.	Canada	N					
JOS. Aggregate Allett and OtherOT AAA XXX		Aggregate Alien and Other		XXX				
					1 521 261	1 650 816	849,482	899,587
DETAILS OF WRITE-INS	55.				1,021,201	1,000,010	0-10 , 402	555,567
	5004							
5801.								
5802.								
5803.	5803.							
5898. Summary of remaining write-ins for		Summary of remaining write-ins for	r					
Line 58 from overflow pageXXXXXX		Line 58 from overflow page		(XXX				
5899. Totals (Lines 5801 thru 5803 plus	5899.			,				
5898)(Line 58 above) XXX XXX		5898)(Line 58 above)	XX	K XXX				

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