



LIFE AND ACCIDENT AND HEALTH COMPANIES - ASSOCIATION EDITION

ANNUAL STATEMENT

FOR THE YEAR ENDED DECEMBER 31, 2009
OF THE CONDITION AND AFFAIRS OF THE

Symetra Life Insurance Company

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

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

Country of Domicile United States of America

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

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

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

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

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

Internet Website Address www.symetra.com

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

OFFICERS

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

OTHER

List of other officers including Allyn David Close, David Christopher Fry, Roger Floyd Harbin, Michele Marie Kemper, Michael Edward Madden, Patrick Bryan McCormick, Troy Junko Olson-Blair, John Richard Warren, Jennifer Victoria Davies, Michael William Fry, Laurie Ann Hubbard, Richard Jefferis Lindsay, Linda Corlett Mahaffey, Kimberly Elaine McSheridan, James Dwyer Pirak, Colin Michael Elder, John Eric Galaviz, Christine Ann Katzmar Holmes, Richard Joseph Lyons, David Elliott Manning, Margaret Alice Meister, and Craig James Schmidt.

DIRECTORS OR TRUSTEES

Allyn David Close, Richard Jefferis Lindsay #, Randall Howard Talbot, Jennifer Victoria Davies, Margaret Alice Meister, Michael William Fry #, George Christopher Pagos

State of Washington SS:
County of King

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

Signatures of Randall Howard Talbot (President), Margaret Alice Meister (Chief Financial Officer), and Colleen Mary Murphy (Treasurer)

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

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



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

**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) .....	14,480,111,022		14,480,111,022	12,313,790,055
2. Stocks (Schedule D):				
2.1 Preferred stocks .....	63,178,945		63,178,945	560,058,638
2.2 Common stocks .....	226,904,128		226,904,128	160,494,027
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens .....	1,177,741,609		1,177,741,609	990,327,460
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 \$ ..... encumbrances) .....				
4.3 Properties held for sale (less \$ encumbrances) .....				
5. Cash (\$ .....(43,119,647) , Schedule E - Part 1), cash equivalents (\$ ..... , Schedule E - Part 2) and short-term investments (\$ .....94,920,630 , Schedule DA) .....	51,800,983		51,800,983	297,912,055
6. Contract loans (including \$ ..... premium notes) .....	73,649,137		73,649,137	74,962,718
7. Other invested assets (Schedule BA) .....	119,541,208		119,541,208	117,425,940
8. Receivables for securities .....	13,429,550	4,865,217	8,564,333	11,834,952
9. Aggregate write-ins for invested assets .....	1,776,506		1,776,506	2,274,242
10. Subtotals, cash and invested assets (Lines 1 to 9) .....	16,208,133,088	4,865,217	16,203,267,871	14,529,080,087
11. Title plants less \$ ..... charged off (for Title insurers only) .....				
12. Investment income due and accrued .....	197,371,361	5,077	197,366,284	171,566,124
13. Premiums and considerations:				
13.1 Uncollected premiums and agents' balances in the course of collection .....	17,961,888	2,387,036	15,574,852	21,426,446
13.2 Deferred premiums and agents' balances and installments booked but deferred and not yet due (including \$ ..... earned but unbilled premiums) .....	49,327,104		49,327,104	47,261,538
13.3 Accrued retrospective premiums .....	99,167		99,167	
14. Reinsurance:				
14.1 Amounts recoverable from reinsurers .....	1,745,175		1,745,175	2,168,763
14.2 Funds held by or deposited with reinsured companies .....	72,806,886		72,806,886	69,734,732
14.3 Other amounts receivable under reinsurance contracts .....	1,324,819		1,324,819	1,581,825
15. Amounts receivable relating to uninsured plans .....				
16.1 Current federal and foreign income tax recoverable and interest thereon .....	17,991,178		17,991,178	22,136,914
16.2 Net deferred tax asset .....	115,818,066	34,734,427	81,083,639	42,803,128
17. Guaranty funds receivable or on deposit .....	10,479,862		10,479,862	7,567,239
18. Electronic data processing equipment and software .....	1,607,389	1,607,389		
19. Furniture and equipment, including health care delivery assets (\$ ..... ) .....	4,655,495	4,655,495		
20. Net adjustment in assets and liabilities due to foreign exchange rates .....				
21. Receivables from parent, subsidiaries and affiliates .....	26,274,052		26,274,052	7,564,667
22. Health care (\$ ..... ) and other amounts receivable .....				
23. Aggregate write-ins for other than invested assets .....	27,365,163	27,068,857	296,306	1,701,598
24. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 10 to 23) .....	16,752,960,693	75,323,498	16,677,637,195	14,924,593,061
25. From Separate Accounts, Segregated Accounts and Protected Cell Accounts .....	4,121,446,909		4,121,446,909	3,721,509,888
26. Total (Lines 24 and 25) .....	20,874,407,602	75,323,498	20,799,084,104	18,646,102,949
<b>DETAILS OF WRITE-INS</b>				
0901. Options .....	1,776,506		1,776,506	2,274,242
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) .....	1,776,506		1,776,506	2,274,242
2301. Accounts and Notes Receivable .....	8,734,734	8,442,030	292,704	1,698,421
2302. Accounts receivable - other insurance companies .....	3,602		3,602	3,177
2303. Intangible Assets .....	15,319,753	15,319,753		
2398. Summary of remaining write-ins for Line 23 from overflow page .....	3,307,074	3,307,074		
2399. Totals (Lines 2301 thru 2303 plus 2398)(Line 23 above) .....	27,365,163	27,068,857	296,306	1,701,598

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

**LIABILITIES, SURPLUS AND OTHER FUNDS**

	1 Current Year	2 Prior Year
1. Aggregate reserve for life contracts \$ .....12,263,550,221 (Exh. 5, Line 9999999) less \$ ..... included in Line 6.3 (including \$ .....611,253 Modco Reserve) .....	12,263,550,221	10,579,100,461
2. Aggregate reserve for accident and health contracts (Exhibit 6, Line 17, Col. 1) (including \$ ..... Modco Reserve) .....	5,440,087	5,744,537
3. Liability for deposit-type contracts (Exhibit 7, Line 14, Col. 1) (including \$ ..... Modco Reserve) .....	2,308,884,223	2,419,277,104
4. Contract claims:		
4.1 Life (Exhibit 8, Part 1, Line 4.4, Col. 1 less sum of Cols. 9, 10 and 11) .....	14,088,936	11,158,354
4.2 Accident and health (Exhibit 8, Part 1, Line 4.4, sum of Cols. 9, 10 and 11) .....	99,951,114	114,211,371
5. Policyholders' dividends \$ ..... and coupons \$ ..... due and unpaid (Exhibit 4, Line 10) .....		
6. Provision for policyholders' dividends and coupons payable in following calendar year - estimated amounts:		
6.1 Dividends apportioned for payment (including \$ ..... Modco) .....	4,633	4,617
6.2 Dividends not yet apportioned (including \$ ..... Modco) .....		
6.3 Coupons and similar benefits (including \$ ..... Modco) .....		
7. Amount provisionally held for deferred dividend policies not included in Line 6 .....		
8. Premiums and annuity considerations for life and accident and health contracts received in advance less \$ ..... discount; including \$ .....1,696,247 accident and health premiums (Exhibit 1, Part 1, Col. 1, sum of lines 4 and 14) .....	2,090,469	1,440,313
9. Contract liabilities not included elsewhere:		
9.1 Surrender values on canceled contracts .....		
9.2 Provision for experience rating refunds, including \$ .....77,076 accident and health experience rating refunds .....	77,076	218,000
9.3 Other amounts payable on reinsurance including \$ ..... assumed and \$ ..... ceded .....		
9.4 Interest maintenance reserve (IMR, Line 6) .....	240,227,505	260,779,068
10. Commissions to agents due or accrued-life and annuity contracts \$ .....(539,001) accident and health \$ .....3,686,429 and deposit-type contract funds \$ .....76,750 .....	3,224,178	1,835,735
11. Commissions and expense allowances payable on reinsurance assumed .....		
12. General expenses due or accrued (Exhibit 2, Line 12, Col. 6) .....	19,817,404	19,319,929
13. Transfers to Separate Accounts due or accrued (net) (including \$ .....6,718,993 accrued for expense allowances recognized in reserves, net of reinsured allowances) .....	(6,792,261)	(6,913,278)
14. Taxes, licenses and fees due or accrued, excluding federal income taxes (Exhibit 3, Line 9, Col. 5) .....	13,954,620	9,292,085
15.1 Current federal and foreign income taxes including \$ ..... on realized capital gains (losses) .....		
15.2 Net deferred tax liability .....		
16. Unearned investment income .....	1,645,923	1,642,048
17. Amounts withheld or retained by company as agent or trustee .....	7,196,885	7,689,869
18. Amounts held for agents' account, including \$ .....10,835 agents' credit balances .....	10,835	4,590
19. Remittances and items not allocated .....	62,447,917	78,542,947
20. Net adjustment in assets and liabilities due to foreign exchange rates .....		
21. Liability for benefits for employees and agents if not included above .....		
22. Borrowed money \$ ..... and interest thereon \$ .....		
23. Dividends to stockholders declared and unpaid .....		
24. Miscellaneous liabilities:		
24.1 Asset valuation reserve (AVR, Line 16, Col. 7) .....	119,046,100	112,732,854
24.2 Reinsurance in unauthorized companies .....		46,632
24.3 Funds held under reinsurance treaties with unauthorized reinsurers .....		
24.4 Payable to parent, subsidiaries and affiliates .....	24,187,364	21,689,298
24.5 Drafts outstanding .....		
24.6 Liability for amounts held under uninsured plans .....		
24.7 Funds held under coinsurance .....		
24.8 Payable for securities .....	1,723,433	22,053,340
24.9 Capital notes \$ ..... and interest thereon \$ .....		
25. Aggregate write-ins for liabilities .....	81,425,427	85,748,528
26. Total Liabilities excluding Separate Accounts business (Lines 1 to 25) .....	15,262,202,090	13,745,618,402
27. From Separate Accounts Statement .....	4,121,446,909	3,721,509,888
28. Total Liabilities (Lines 26 and 27) .....	19,383,648,999	17,467,128,290
29. Common capital stock .....	5,000,000	5,000,000
30. Preferred capital stock .....		
31. Aggregate write-ins for other than special surplus funds .....		
32. Surplus notes .....		
33. Gross paid in and contributed surplus (Page 3, Line 33, Col. 2 plus Page 4, Line 51.1, Col. 1) .....	422,175,394	320,107,129
34. Aggregate write-ins for special surplus funds .....	38,662,583	
35. Unassigned funds (surplus) .....	949,597,128	853,867,530
36. Less treasury stock, at cost:		
36.1 ..... shares common (value included in Line 29 \$ ..... ) .....		
36.2 ..... shares preferred (value included in Line 30 \$ ..... ) .....		
37. Surplus (Total Lines 31+32+33+34+35-36) (including \$ ..... in Separate Accounts Statement) .....	1,410,435,105	1,173,974,659
38. Totals of Lines 29, 30 and 37 (Page 4, Line 55) .....	1,415,435,105	1,178,974,659
39. Totals of Lines 28 and 38 (Page 2, Line 26, Col. 3) .....	20,799,084,104	18,646,102,949
<b>DETAILS OF WRITE-INS</b>		
2501. Affordable housing liability .....	35,064,439	52,418,158
2502. Amounts held for the account of others .....	43,857,225	30,914,178
2503. Unearned mortgage loan fees .....	2,049,801	2,088,751
2598. Summary of remaining write-ins for Line 25 from overflow page .....	453,962	327,441
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above) .....	81,425,427	85,748,528
3101. ....		
3102. ....		
3103. ....		
3198. Summary of remaining write-ins for Line 31 from overflow page .....		
3199. Totals (Lines 3101 thru 3103 plus 3198)(Line 31 above) .....		
3401. Deferred tax asset adjustment related to SSAP #10R .....	38,662,583	
3402. ....		
3403. ....		
3498. Summary of remaining write-ins for Line 34 from overflow page .....		
3499. Totals (Lines 3401 thru 3403 plus 3498)(Line 34 above) .....	38,662,583	

**SUMMARY OF OPERATIONS**

	1 Current Year	2 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) .....	2,827,927,555	2,275,145,032
2. Considerations for supplementary contracts with life contingencies .....		
3. Net investment income (Exhibit of Net Investment Income, Line 17) .....	947,509,167	842,865,956
4. Amortization of interest maintenance reserve (IMR, Line 5) .....	19,827,539	20,076,297
5. Separate Accounts net gain from operations excluding unrealized gains or losses .....		1,103,413
6. Commissions and expense allowances on reinsurance ceded (Exhibit 1, Part 2, Line 26.1, Col. 1) .....	9,835,389	12,994,206
7. Reserve adjustments on reinsurance ceded .....	24,197	23,594
8. Miscellaneous Income:		
8.1 Income from fees associated with investment management, administration and contract guarantees from Separate Accounts .....	48,036,593	50,801,547
8.2 Charges and fees for deposit-type contracts .....		
8.3 Aggregate write-ins for miscellaneous income .....	11,387,123	11,569,748
9. Total (Lines 1 to 8.3) .....	3,864,547,564	3,214,579,793
10. Death benefits .....	89,733,669	86,203,940
11. Matured endowments (excluding guaranteed annual pure endowments) .....	66,879	109,494
12. Annuity benefits (Exhibit 8, Part 2, Line 6.4, Cols. 4 + 8) .....	292,545,459	281,167,396
13. Disability benefits and benefits under accident and health contracts .....	283,858,678	289,162,968
14. Coupons, guaranteed annual pure endowments and similar benefits .....		
15. Surrender benefits and withdrawals for life contracts .....	817,514,805	839,704,610
16. Group conversions .....		
17. Interest and adjustments on contract or deposit-type contract funds .....	150,565,629	163,008,859
18. Payments on supplementary contracts with life contingencies .....	11,979	11,979
19. Increase in aggregate reserves for life and accident and health contracts .....	1,684,145,303	1,085,684,195
20. Totals (Lines 10 to 19) .....	3,318,442,401	2,745,053,441
21. Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only) (Exhibit 1, Part 2, Line 31, Col. 1) .....	165,448,054	139,676,314
22. Commissions and expense allowances on reinsurance assumed (Exhibit 1, Part 2, Line 26.2, Col. 1) .....	457,574	495,733
23. General insurance expenses (Exhibit 2, Line 10, Cols. 1, 2, 3 and 4) .....	178,552,706	183,086,593
24. Insurance taxes, licenses and fees, excluding federal income taxes (Exhibit 3, Line 7, Cols. 1 + 2 + 3) .....	20,851,380	20,654,677
25. Increase in loading on deferred and uncollected premiums .....	2,036,480	926,583
26. Net transfers to or (from) Separate Accounts net of reinsurance .....	18,545,122	10,512,944
27. Aggregate write-ins for deductions .....		
28. Totals (Lines 20 to 27) .....	3,704,333,717	3,100,406,285
29. Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28) .....	160,213,847	114,173,508
30. Dividends to policyholders .....	5,164	4,090
31. Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30) .....	160,208,683	114,169,418
32. Federal and foreign income taxes incurred (excluding tax on capital gains) .....	30,741,842	14,949,197
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) .....	129,466,841	99,220,221
34. Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of \$ ..... (20,937,942) (excluding taxes of \$ ..... (389,860) transferred to the IMR) .....	(86,414,574)	(62,512,058)
35. Net income (Line 33 plus Line 34) .....	43,052,267	36,708,163
<b>CAPITAL AND SURPLUS ACCOUNT</b>		
36. Capital and surplus, December 31, prior year (Page 3, Line 38, Col. 2) .....	1,178,974,659	1,224,998,183
37. Net income (Line 35) .....	43,052,267	36,708,163
38. Change in net unrealized capital gains (losses) less capital gains tax of \$ ..... 19,489,248 .....	34,790,607	(72,916,349)
39. Change in net unrealized foreign exchange capital gain (loss) .....	818,471	(733,381)
40. Change in net deferred income tax .....	9,019,416	13,881,238
41. Change in nonadmitted assets .....	14,497,469	(35,504,892)
42. Change in liability for reinsurance in unauthorized companies .....	46,632	(46,632)
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 .....	(6,313,243)	62,588,329
45. Change in treasury stock (Page 3, Lines 36.1 and 36.2, Col. 2 minus Col. 1) .....		
46. Surplus (contributed to) withdrawn from Separate Accounts during period .....		384,566
47. Other changes in surplus in Separate Accounts Statement .....		(384,566)
48. Change in surplus notes .....		
49. Cumulative effect of changes in accounting principles .....	(182,021)	
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 .....	102,068,265	50,000,000
51.2 Transferred to capital (Stock Dividend) .....		
51.3 Transferred from capital .....		
51.4 Change in surplus as a result of reinsurance .....		
52. Dividends to stockholders .....		(100,000,000)
53. Aggregate write-ins for gains and losses in surplus .....	38,662,583	
54. Net change in capital and surplus for the year (Lines 37 through 53) .....	236,460,446	(46,023,524)
55. Capital and surplus, December 31, current year (Lines 36 + 54) (Page 3, Line 38) .....	1,415,435,105	1,178,974,659
<b>DETAILS OF WRITE-INS</b>		
08.301. Other revenue .....	5,674,645	5,784,294
08.302. Surrender, set-up and administration fees .....	5,272,457	4,822,271
08.303. Reinsurance experience refunds .....	440,021	963,183
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) .....	11,387,123	11,569,748
2701. ....		
2702. ....		
2703. ....		
2798. Summary of remaining write-ins for Line 27 from overflow page .....		
2799. Totals (Lines 2701 thru 2703 plus 2798)(Line 27 above) .....		
5301. Deferred tax asset adjustment related to SSAP #10R .....	38,662,583	
5302. ....		
5303. ....		
5398. Summary of remaining write-ins for Line 53 from overflow page .....		
5399. Totals (Lines 5301 thru 5303 plus 5398)(Line 53 above) .....	38,662,583	

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

**CASH FLOW**

	1	2
	Current Year	Prior Year
<b>Cash from Operations</b>		
1. Premiums collected net of reinsurance .....	2,829,553,037	2,275,935,816
2. Net investment income .....	909,985,851	836,749,853
3. Miscellaneous income .....	68,707,369	76,114,769
4. Total (Lines 1 through 3) .....	3,808,246,257	3,188,800,438
5. Benefit and loss related payments .....	1,644,125,329	1,635,093,046
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts .....	18,424,105	6,948,635
7. Commissions, expenses paid and aggregate write-ins for deductions .....	356,129,406	341,897,448
8. Dividends paid to policyholders .....	5,148	5,130
9. Federal and foreign income taxes paid (recovered) net of \$ .....(24,142,800) tax on capital gains (losses) .....	5,268,304	41,827,942
10. Total (Lines 5 through 9) .....	2,023,952,292	2,025,772,201
11. Net cash from operations (Line 4 minus Line 10) .....	1,784,293,965	1,163,028,237
<b>Cash from Investments</b>		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds .....	1,465,523,222	1,009,479,133
12.2 Stocks .....	41,416,286	42,268,810
12.3 Mortgage loans .....	74,862,581	91,428,556
12.4 Real estate .....		
12.5 Other invested assets .....		101,753,794
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments .....		(18,439)
12.7 Miscellaneous proceeds .....	3,693,971	16,616,103
12.8 Total investment proceeds (Lines 12.1 to 12.7) .....	1,585,496,060	1,261,527,957
13. Cost of investments acquired (long-term only):		
13.1 Bonds .....	3,202,274,988	1,690,678,027
13.2 Stocks .....	71,326,228	132,806,369
13.3 Mortgage loans .....	264,466,779	235,835,117
13.4 Real estate .....		
13.5 Other invested assets .....	12,606,081	18,869,319
13.6 Miscellaneous applications .....	24,730,177	1,914,966
13.7 Total investments acquired (Lines 13.1 to 13.6) .....	3,575,404,253	2,080,103,798
14. Net increase (decrease) in contract loans and premium notes .....	(1,313,580)	(1,967,213)
15. Net cash from investments (Line 12.8 minus Line 13.7 minus Line 14) .....	(1,988,594,613)	(816,608,628)
<b>Cash from Financing and Miscellaneous Sources</b>		
16. Cash provided (applied):		
16.1 Surplus notes, capital notes .....		
16.2 Capital and paid in surplus, less treasury stock .....	102,068,265	50,000,000
16.3 Borrowed funds .....		
16.4 Net deposits on deposit-type contracts and other insurance liabilities .....	(110,392,880)	(146,336,634)
16.5 Dividends to stockholders .....		100,000,000
16.6 Other cash provided (applied) .....	(33,485,809)	42,687,314
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6) .....	(41,810,424)	(153,649,320)
<b>RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS</b>		
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17) .....	(246,111,072)	192,770,289
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year .....	297,912,055	105,141,766
19.2 End of year (Line 18 plus Line 19.1) .....	51,800,983	297,912,055

Note: Supplemental disclosures of cash flow information for non-cash transactions:

20.0001. Bonds and Stocks - Exchanges .....	214,638,538	44,226,030
20.0002. Bonds - Capital Contribution to the Company from Parent .....	101,985,765	49,729,250
20.0003. Interest Capitalization .....	32,698,772	29,345,926
20.0004. Other Invested Assets - Affordable Housing Liability .....	10,695,949	4,202,340
20.0005. Bonds and Stocks - Bonds Converted to Stock .....	5,604,665	1,043,438
20.0006. Bonds and Stocks - net transfer (from)/to General Account (to)/from Separate Account .....	4,472,561	(36,239,249)
20.0007. Mortgage loans - Refinances .....	1,477,716	11,969,423
20.0008. Stocks - Preferred Stock converted to Common Stock .....	305,758	
20.0009. Bonds and Other Invested Assets - Bonds converted to Warrants .....	253,771	
20.0010. Stocks - Spinoffs .....	77,930	949,849
20.0011. Non Cash Litigation Settlement .....	5,078	195,840
20.0012. Bonds and Stocks - Transfer from Parent to the Company in exchange for Other Invested Assets .....		79,031,953

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

	1 Total	2 Industrial Life	3 Ordinary			6 Credit Life (Group and Individual)	7 Group		9 Accident and Health			12 Aggregate of All Other Lines of Business
			3 Life Insurance	4 Individual Annuities	5 Supplementary Contracts		7 Life Insurance (a)	8 Annuities	9 Group	10 Credit (Group and Individual)	11 Other	
1. Premiums and annuity considerations for life and accident and health contracts	2,827,927,555		107,237,716	2,214,579,089			33,881,818	57,431,734	413,784,869		1,012,330	
2. Considerations for supplementary contracts with life contingencies												
3. Net investment income	947,509,167		100,244,122	767,897,926	155,195		3,752,966	61,111,473	13,936,020		411,465	
4. Amortization of Interest Maintenance Reserve (IMR)	19,827,539		2,097,704	16,069,002	3,248		78,534	1,278,816	291,625		8,610	
5. Separate Accounts net gain from operations excluding unrealized gains or losses												
6. Commissions and expense allowances on reinsurance ceded	9,835,389		9,834,461	928								
7. Reserve adjustments on reinsurance ceded	24,197		24,197									
8. Miscellaneous Income:												
8.1 Fees associated with income from investment management, administration and contract guarantees from Separate Accounts	48,036,593		38,237,771	5,748,607			521,768	3,528,447				
8.2 Charges and fees for deposit-type contracts												
8.3 Aggregate write-ins for miscellaneous income	11,387,123		4,782,723	5,619,855	11		145	680,402	303,975		12	
9. Totals (Lines 1 to 8.3)	3,864,547,563		262,458,693	3,009,915,407	158,454		38,235,231	124,030,872	428,316,489		1,432,417	
10. Death benefits	89,733,669		84,687,834				5,045,835					
11. Matured endowments (excluding guaranteed annual pure endowments)	66,879		66,879									
12. Annuity benefits	292,545,459			284,670,708				7,874,751				
13. Disability benefits and benefits under accident and health contracts	283,858,678		361,556						282,440,137		1,056,985	
14. Coupons, guaranteed annual pure endowments and similar benefits												
15. Surrender benefits and withdrawals for life contracts	817,514,805		123,812,444	541,850,795			7,804	151,843,762				
16. Group conversions			(134,976)				134,976					
17. Interest and adjustments on contract or deposit-type contract funds	150,565,629		2,140,483	143,042,484	151,401		12,838	5,214,064	3,859		500	
18. Payments on supplementary contracts with life contingencies	11,979				11,979							
19. Increase in aggregate reserves for life and accident and health contracts	1,684,145,303		(103,398,048)	1,827,238,314	(3,519)		(3,761,156)	(35,625,837)	(435,785)		131,334	
20. Totals (Lines 10 to 19)	3,318,442,401		107,536,172	2,796,802,301	159,861		1,440,297	129,306,740	282,008,211		1,188,819	
21. Commissions on premiums, annuity considerations and deposit-type contract funds (direct business only)	165,448,054		20,640,864	105,779,496			2,501,015	2,333,996	34,179,777		12,905	
22. Commissions and expense allowances on reinsurance assumed	457,574		357,171						100,403			
23. General insurance expenses	178,552,706		39,538,613	61,254,318			5,002,050	12,914,838	59,637,285		205,602	
24. Insurance taxes, licenses and fees, excluding federal income taxes	20,851,380		4,033,089	3,804,925			1,445,923	726,230	10,812,309		28,904	
25. Increase in loading on deferred and uncollected premiums	2,036,480		2,036,480									
26. Net transfers to or (from) Separate Accounts net of reinsurance	18,545,122		41,905,773	(18,605,599)			23,706,086	(28,461,138)				
27. Aggregate write-ins for deductions												
28. Totals (Lines 20 to 27)	3,704,333,717		216,048,162	2,949,035,441	159,861		34,095,371	116,820,666	386,737,985		1,436,230	
29. Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)	160,213,847		46,410,531	60,879,966	(1,407)		4,139,860	7,210,206	41,578,504		(3,813)	
30. Dividends to policyholders	5,164		5,164									
31. Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30)	160,208,683		46,405,367	60,879,966	(1,407)		4,139,860	7,210,206	41,578,504		(3,813)	
32. Federal income taxes incurred (excluding tax on capital gains)	30,741,842		10,460,155	5,073,011	(4,283)		1,230,340	(323,761)	14,342,323		(35,943)	
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)	129,466,841		35,945,212	55,806,955	2,876		2,909,520	7,533,967	27,236,181		32,130	
<b>DETAILS OF WRITE-INS</b>												
08.301. Surrender Fees, Set-up and Administration Fees	5,272,457		291,101	4,399,185				582,171				
08.302. Other Revenue	5,674,645		4,305,304	1,220,670	11		145	98,231	50,272		12	
08.303. Reinsurance Experience Refunds	440,021		186,318						253,703			
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)	11,387,123		4,782,723	5,619,855	11		145	680,402	303,975		12	
2701.												
2702.												
2703.												
2798. Summary of remaining write-ins for Line 27 from overflow page												
2799. 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 \_\_\_\_\_

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

	1 Total	2 Industrial Life	Ordinary			6 Credit Life (Group and Individual)	Group	
			3 Life Insurance	4 Individual Annuities	5 Supplementary Contracts		7 Life Insurance	8 Annuities
Involving Life or Disability Contingencies (Reserves)  (Net of Reinsurance Ceded)								
1. Reserve December 31, prior year .....	10,579,100,461		1,604,854,051	8,035,509,194	107,071		25,048,563	913,581,582
2. Tabular net premiums or considerations .....	2,547,457,065		241,564,424	2,214,579,089			33,881,818	57,431,734
3. Present value of disability claims incurred .....	74,396		74,396		XXX			
4. Tabular interest .....	542,650,636		75,331,117	428,794,530	11,979		1,285,821	37,227,189
5. Tabular less actual reserve released .....	(11,022,311)		145,833	(12,137,241)	(3,519)			972,616
6. Increase in reserve on account of change in valuation basis .....								
7. Other increases (net) .....	(2,159,721)		(2,992,424)	3,917,840			(3,085,137)	
8. Totals (Lines 1 to 7) .....	13,656,100,526		1,918,977,397	10,670,663,412	115,531		57,131,065	1,009,213,121
9. Tabular cost .....	233,491,531		221,463,742		XXX		12,027,789	
10. Reserves released by death .....	22,927,775		22,909,949	XXX	XXX		17,826	XXX
11. Reserves released by other terminations (net) .....	824,634,627		130,848,113	541,850,794			91,956	151,843,764
12. Annuity, supplementary contract and disability payments involving life contingencies .....	292,951,251		393,813	284,670,708	11,979			7,874,751
13. Net transfers to or (from) Separate Accounts .....	18,545,121		41,905,772	(18,605,599)			23,706,086	(28,461,138)
14. Total Deductions (Lines 9 to 13) .....	1,392,550,305		417,521,389	807,915,903	11,979		35,843,657	131,257,377
15. Reserve December 31, current year	12,263,550,221		1,501,456,008	9,862,747,509	103,552		21,287,408	877,955,744

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

**EXHIBIT OF NET INVESTMENT INCOME**

	1 Collected During Year	2 Earned During Year
1. U.S. Government bonds .....	(a) 4,082,546	3,955,453
1.1 Bonds exempt from U.S. tax .....	(a) .....	.....
1.2 Other bonds (unaffiliated) .....	(a) 851,184,656	876,738,930
1.3 Bonds of affiliates .....	(a) .....	.....
2.1 Preferred stocks (unaffiliated) .....	(b) 4,536,700	4,536,700
2.11 Preferred stocks of affiliates .....	(b) .....	.....
2.2 Common stocks (unaffiliated) .....	2,496,465	2,521,506
2.21 Common stocks of affiliates .....	1,000,000	1,000,000
3. Mortgage loans .....	(c) 67,485,421	68,059,970
4. Real estate .....	(d) .....	.....
5. Contract loans .....	4,272,989	4,370,616
6. Cash, cash equivalents and short-term investments .....	(e) 1,294,555	974,871
7. Derivative instruments .....	(f) .....	.....
8. Other invested assets .....	2,760,689	2,563,938
9. Aggregate write-ins for investment income .....	1,455,776	1,455,776
10. Total gross investment income .....	940,569,797	966,177,760
11. Investment expenses .....		(g) 18,499,063
12. Investment taxes, licenses and fees, excluding federal income taxes .....		(g) 168,019
13. Interest expense .....		(h) 1,511
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) .....		18,668,593
17. Net investment income (Line 10 minus Line 16) .....		947,509,167
<b>DETAILS OF WRITE-INS</b>		
0901. Interest Income -Tax .....	9,376	9,376
0902. Interest Income -Affiliates .....	565,334	565,334
0903. Income Rec - Securities Lending .....	137,258	137,258
0998. Summary of remaining write-ins for Line 9 from overflow page .....	743,808	743,808
0999. Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above) .....	1,455,776	1,455,776
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 \$ 49,028,167 accrual of discount less \$ 38,899,914 amortization of premium and less \$ 19,073,541 paid for accrued interest on purchases.
- (b) Includes \$ 33,916 accrual of discount less \$ 129,124 amortization of premium and less \$ ..... paid for accrued dividends on purchases.
- (c) Includes \$ ..... accrual of discount less \$ ..... amortization of premium and less \$ ..... paid for accrued interest on purchases.
- (d) Includes \$ ..... for company's occupancy of its own buildings; and excludes \$ ..... interest on encumbrances.
- (e) Includes \$ 8,695 accrual of discount less \$ 6,631 amortization of premium and less \$ 9,252 paid for accrued interest on purchases.
- (f) Includes \$ ..... accrual of discount less \$ ..... amortization of premium.
- (g) Includes \$ ..... investment expenses and \$ ..... investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$ ..... interest on surplus notes and \$ ..... interest on capital notes.
- (i) Includes \$ ..... depreciation on real estate and \$ ..... depreciation on other invested assets.

**EXHIBIT OF CAPITAL GAINS (LOSSES)**

	1	2	3	4	5
	Realized Gain (Loss) On Sales or Maturity	Other Realized Adjustments	Total Realized Capital Gain (Loss) (Columns 1 + 2)	Change in Unrealized Capital Gain (Loss)	Change in Unrealized Foreign Exchange Capital Gain (Loss)
1. U.S. Government bonds .....	(1,235,495)		(1,235,495)		
1.1 Bonds exempt from U.S. tax .....					
1.2 Other bonds (unaffiliated) .....	6,203,105	(90,546,326)	(84,343,221)	8,248,127	665
1.3 Bonds of affiliates .....					
2.1 Preferred stocks (unaffiliated) .....				50,840	
2.11 Preferred stocks of affiliates .....					
2.2 Common stocks (unaffiliated) .....	4,314,173	(26,250,609)	(21,936,436)	58,697,711	1,258,522
2.21 Common stocks of affiliates .....				(1,304,058)	
3. Mortgage loans .....		(2,190,049)	(2,190,049)		
4. Real estate .....					
5. Contract loans .....					
6. Cash, cash equivalents and short-term investments .....					
7. Derivative instruments .....	2,266,839		2,266,839	(1,443,737)	
8. Other invested assets .....		(496,736)	(496,736)	(9,969,028)	
9. Aggregate write-ins for capital gains (losses) .....		(531,304)	(531,304)		
10. Total capital gains (losses) .....	11,548,622	(120,015,024)	(108,466,402)	54,279,855	1,259,187
<b>DETAILS OF WRITE-INS</b>					
0901. Allowance for Uncollectible Receivable .....		(486,000)	(486,000)		
0902. FX Income Settlement Gain/Loss .....		(45,304)	(45,304)		
0903. ....					
0998. Summary of remaining write-ins for Line 9 from overflow page .....					
0999. Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above) .....		(531,304)	(531,304)		



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

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

	1 Total	2 Industrial Life	Ordinary		5 Credit Life (Group and Individual)	Group		Accident and Health			11 Aggregate of All Other Lines of Business
			3 Life Insurance	4 Individual Annuities		6 Life Insurance	7 Annuities	8 Group	9 Credit (Group and Individual)	10 Other	
<b>FIRST YEAR (other than single)</b>											
1. Uncollected	3,509,901		30,252			54,255		3,425,394			
2. Deferred and accrued	2,514,484		2,514,484								
3. Deferred, accrued and uncollected:											
3.1 Direct	6,233,756		2,556,453			113,866		3,563,437			
3.2 Reinsurance assumed	57,106							57,106			
3.3 Reinsurance ceded	266,477		11,717			59,611		195,149			
3.4 Net (Line 1 + Line 2)	6,024,385		2,544,736			54,255		3,425,394			
4. Advance	681,502		11,871					669,631			
5. Line 3.4 - Line 4	5,342,883		2,532,865			54,255		2,755,763			
6. Collected during year:											
6.1 Direct	248,952,997		10,382,017	158,170,854		1,992,163	10,399,531	68,008,432			
6.2 Reinsurance assumed	86,263		222					86,041			
6.3 Reinsurance ceded	3,238,146		666,759			631,563		1,939,823			
6.4 Net	245,801,114		9,715,480	158,170,854		1,360,600	10,399,531	66,154,649			
7. Line 5 + Line 6.4	251,143,997		12,248,345	158,170,854		1,414,854	10,399,531	68,910,412			
8. Prior year (uncollected + deferred and accrued - advance)	4,820,596		913,482			52,524		3,854,590			
9. First year premiums and considerations:											
9.1 Direct	249,288,082		11,837,950	158,170,854		1,987,799	10,399,531	66,891,948			
9.2 Reinsurance assumed	99,458		222					99,236			
9.3 Reinsurance ceded	3,064,139		503,309			625,468		1,935,362			
9.4 Net (Line 7 - Line 8)	246,323,401		11,334,863	158,170,854		1,362,331	10,399,531	65,055,822			
<b>SINGLE</b>											
10. Single premiums and considerations:											
10.1 Direct	2,056,725,068		15,591,213	2,016,090,842		25,043,013					
10.2 Reinsurance assumed											
10.3 Reinsurance ceded											
10.4 Net	2,056,725,068		15,591,213	2,016,090,842		25,043,013					
<b>RENEWAL</b>											
11. Uncollected	12,252,266		(3,198,062)	(848)		(557,015)		16,008,192			
12. Deferred and accrued	23,183,413		23,183,413								
13. Deferred, accrued and uncollected:											
13.1 Direct	41,923,108		24,295,532	71,298		340,109		17,216,169			
13.2 Reinsurance assumed	56,298		56,298								
13.3 Reinsurance ceded	6,543,727		4,366,479	72,146		897,125		1,207,977			
13.4 Net (Line 11 + Line 12)	35,435,679		19,985,351	(848)		(557,015)		16,008,192			
14. Advance	1,408,967		361,955			20,396		1,026,616			
15. Line 13.4 - Line 14	34,026,712		19,623,396	(848)		(577,411)		14,981,576			
16. Collected during year:											
16.1 Direct	586,134,375		126,790,701	41,216,907		11,432,371	47,032,203	358,592,904		1,069,289	
16.2 Reinsurance assumed	531,343		128,908	5,200		51,058		346,177			
16.3 Reinsurance ceded	59,797,267		44,424,292	875,722		4,020,325		10,419,968		56,959	
16.4 Net	526,868,451		82,495,317	40,346,384		7,463,104	47,032,203	348,519,113		1,012,330	
17. Line 15 + Line 16.4	560,895,164		102,118,712	40,345,536		6,885,693	47,032,203	363,500,689		1,012,330	
18. Prior year (uncollected + deferred and accrued - advance)	36,016,079		21,807,073	28,144		(590,780)		14,771,642			
19. Renewal premiums and considerations:											
19.1 Direct	583,771,059		124,090,430	41,191,167		11,393,496	47,032,203	358,994,474		1,069,289	
19.2 Reinsurance assumed	520,157		117,722	5,200		51,058		346,177			
19.3 Reinsurance ceded	59,412,130		43,896,512	878,974		3,968,080		10,611,604		56,959	
19.4 Net (Line 17 - Line 18)	524,879,086		80,311,640	40,317,393		7,476,474	47,032,203	348,729,047		1,012,330	
<b>TOTAL</b>											
20. Total premiums and annuity considerations:											
20.1 Direct	2,889,784,210		151,519,593	2,215,452,863		38,424,308	57,431,734	425,886,422		1,069,289	
20.2 Reinsurance assumed	619,614		117,944	5,200		51,058		445,412			
20.3 Reinsurance ceded	62,476,269		44,399,822	878,974		4,593,548		12,546,965		56,959	
20.4 Net (Lines 9.4 + 10.4 + 19.4)	2,827,927,555		107,237,716	2,214,579,089		33,881,818	57,431,734	413,784,869		1,012,330	

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

	1 Total	2 Industrial Life	Ordinary		5 Credit Life (Group and Individual)	Group		Accident and Health			11 Aggregate of All Other Lines of Business
			3 Life Insurance	4 Individual Annuities		6 Life Insurance	7 Annuities	8 Group	9 Credit (Group and Individual)	10 Other	
<b>DIVIDENDS AND COUPONS APPLIED (included in Part 1)</b>											
21. To pay renewal premiums .....	520		520								
22. All other .....	454		454								
<b>REINSURANCE COMMISSIONS AND EXPENSE ALLOWANCES INCURRED</b>											
23. First year (other than single):											
23.1 Reinsurance ceded .....	502,960		502,960								
23.2 Reinsurance assumed .....	20,081							20,081			
23.3 Net ceded less assumed .....	482,879		502,960					(20,081)			
24. Single:											
24.1 Reinsurance ceded .....											
24.2 Reinsurance assumed .....	357,171		357,171								
24.3 Net ceded less assumed .....	(357,171)		(357,171)								
25. Renewal:											
25.1 Reinsurance ceded .....	9,332,429		9,331,501	928							
25.2 Reinsurance assumed .....	80,322							80,322			
25.3 Net ceded less assumed .....	9,252,107		9,331,501	928				(80,322)			
26. Totals:											
26.1 Reinsurance ceded (Page 6, Line 6) .....	9,835,389		9,834,461	928							
26.2 Reinsurance assumed (Page 6, Line 22) .....	457,574		357,171					100,403			
26.3 Net ceded less assumed .....	9,377,815		9,477,290	928				(100,403)			
<b>COMMISSIONS INCURRED (direct business only)</b>											
27. First year (other than single) .....	20,501,635		7,380,985	4,538,473		640,042	47,682	7,894,453			
28. Single .....	107,370,509		12,019,885	94,494,150		700,492	155,982				
29. Renewal .....	33,803,887		1,239,994	3,567,671		1,160,482	1,537,512	26,285,324		12,905	
30. Deposit-type contract funds .....	3,772,022			3,179,202			592,820				
31. Totals (to agree with Page 6, Line 21)	165,448,054		20,640,864	105,779,496		2,501,015	2,333,996	34,179,777		12,905	

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

**EXHIBIT 2 - GENERAL EXPENSES**

	Insurance				5 Investment	6 Total
	1 Life	2 Accident and Health		4 All Other Lines of Business		
		2 Cost Containment	3 All Other			
1. Rent	4,802,907		1,935,717		186,470	6,925,094
2. Salaries and wages	61,301,619		24,630,714		2,253,489	88,185,822
3.11 Contributions for benefit plans for employees	9,674,021		3,895,468		207,728	13,777,217
3.12 Contributions for benefit plans for agents						
3.21 Payments to employees under non-funded benefit plans						
3.22 Payments to agents under non-funded benefit plans						
3.31 Other employee welfare	1,114,705		448,854		3,361	1,566,919
3.32 Other agent welfare						
4.1 Legal fees and expenses	753,415		303,186		17,221	1,073,823
4.2 Medical examination fees	2,879,015	30,317	1,128,245		35,000	4,072,577
4.3 Inspection report fees	43,475		17,495		24,385	85,355
4.4 Fees of public accountants and consulting actuaries	1,348,145		542,515			1,890,661
4.5 Expense of investigation and settlement of policy claims	709,234		285,407			994,642
5.1 Traveling expenses	2,034,315		888,701		81,896	3,004,912
5.2 Advertising	1,971,974		970,200		6,716	2,948,890
5.3 Postage, express, telegraph and telephone	2,147,039		866,490		36,933	3,050,461
5.4 Printing and stationery	2,545,594		1,031,491		14,519	3,591,604
5.5 Cost or depreciation of furniture and equipment	905,124		364,657		27,801	1,297,582
5.6 Rental of equipment						
5.7 Cost or depreciation of EDP equipment and software	5,907,739		2,377,944		45,969	8,331,652
6.1 Books and periodicals	290,198		116,813		657	407,668
6.2 Bureau and association fees	472,831		190,738		5,440	669,008
6.3 Insurance, except on real estate	833,920		335,583			1,169,503
6.4 Miscellaneous losses						
6.5 Collection and bank service charges	792,593		318,952		111,824	1,223,370
6.6 Sundry general expenses						
6.7 Group service and administration fees	413,324		6,698,068			7,111,392
6.8 Reimbursements by uninsured plans						
7.1 Agency expense allowance						
7.2 Agents' balances charged off (less \$ recovered)	15,057		6,059			21,116
7.3 Agency conferences other than local meetings	791,414					791,414
9.1 Real estate expenses						
9.2 Investment expenses not included elsewhere	(80,940)				15,426,687	15,345,747
9.3 Aggregate write-ins for expenses	17,043,102		12,459,272		12,968	29,515,343
10. General expenses incurred	118,709,819	30,317	59,812,570		18,499,063	(a) 197,051,769
11. General expenses unpaid December 31, prior year	13,998,386		5,182,383		139,160	19,319,929
12. General expenses unpaid December 31, current year	13,640,278		5,811,103		366,022	19,817,404
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)	119,067,927	30,317	59,183,850		18,272,201	196,554,294
<b>DETAILS OF WRITE-INS</b>						
09.301. Consulting Fees	13,146,040		5,320,370		12,858	18,479,268
09.302. Miscellaneous	3,886,141		1,564,680		110	5,450,931
09.303. Amortization of Goodwill	10,921		3,004,222			3,015,143
09.398. Summary of remaining write-ins for Line 9.3 from overflow page			2,570,000			2,570,000
09.399. Totals (Lines 09.301 thru 09.303 plus 09.398) (Line 9.3 above)	17,043,102		12,459,272		12,968	29,515,343

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

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

	Insurance			4 Investment	5 Total
	1 Life	2 Accident and Health	3 All Other Lines of Business		
1. Real estate taxes	42,890	10,945			53,835
2. State insurance department licenses and fees	1,020,592	1,030,412			2,051,004
3. State taxes on premiums	3,296,954	8,358,102			11,655,056
4. Other state taxes, including \$ for employee benefits	832,547	212,458		11,333	1,056,338
5. U.S. Social Security taxes	4,229,806	1,079,404		154,946	5,464,156
6. All other taxes	587,378	149,893		1,739	739,010
7. Taxes, licenses and fees incurred	10,010,167	10,841,213		168,019	21,019,399
8. Taxes, licenses and fees unpaid December 31, prior year	1,473,838	7,818,247			9,292,085
9. Taxes, licenses and fees unpaid December 31, current year	11,155,493	2,799,127			13,954,620
10. Taxes, licenses and fees paid during year (Lines 7 + 8 - 9)	328,511	15,860,333		168,019	16,356,863

**EXHIBIT 4 - DIVIDENDS OR REFUNDS**

	1 Life	2 Accident and Health
1. Applied to pay renewal premiums	520	
2. Applied to shorten the endowment or premium-paying period		
3. Applied to provide paid-up additions	454	
4. Applied to provide paid-up annuities		
5. Total Lines 1 through 4	974	
6. Paid in cash	638	
7. Left on deposit	3,536	
8. Aggregate write-ins for dividend or refund options		
9. Total Lines 5 through 8	5,148	
10. Amount due and unpaid		
11. Provision for dividends or refunds payable in the following calendar year	4,633	
12. Terminal dividends		
13. Provision for deferred dividend contracts		
14. Amount provisionally held for deferred dividend contracts not included in Line 13		
15. Total Lines 10 through 14	4,633	
16. Total from prior year	4,617	
17. Total dividends or refunds (Lines 9 + 15 - 16)	5,164	
<b>DETAILS OF WRITE-INS</b>		
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	6
Valuation Standard	Total	Industrial	Ordinary	Credit (Group and Individual)	Group
0100001. 1941 CSO NLP 2.5% (57 - 66)	179,178		179,178		
0100002. 1941 CSO NLP 3% (57 - 64)	5,051,137		5,051,137		
0100003. 1941 CSO CRVM 3% (58 - 63, 68 - 97)	316,821		316,821		
0100004. 1958 CET CRVM 3% (67 - 76)	392,772		392,772		
0100005. 1958 CET CRVM 3.5% (75 - 81)	224,401		224,401		
0100006. 1958 CET CRVM 4% (80 - 92)	163,563		163,563		
0100007. 1958 CET NLP 3% (62 - 84)	194,518		194,518		
0100008. 1958 CET NLP 3.5% (74 - 80)	7,828		7,828		
0100009. 1958 CET NLP 4% (78 - 01)	63,449		63,449		
0100010. 1958 CSO CRVM 2.5% (63 - 67)	56,051		56,051		
0100011. 1958 CSO CRVM 3% (61 - 06)	18,031,360		18,031,360		
0100012. 1958 CSO CRVM 3.5% (67 - 83)	7,980,063		7,980,063		
0100013. 1958 CSO CRVM 4% (80 - 95)	4,961,669		4,961,669		
0100014. 1958 CSO CRVM 5.5% (80 - 85)	194,642		194,642		
0100015. 1958 CSO CRVM 3.75% (71)	23,225		23,225		
0100016. 58 CSO CRVM 5.5% (1982-87)	15,961,665		15,961,665		
0100017. 58 CSO CRVM 6.0% (1982-85, 87-92)	75,536,960		75,536,960		
0100018. 1958 CSO FPT 3.5% (74 - 93)	518		518		
0100019. 1958 CSO NLP 3% (62 - 08)	25,197,904		25,197,904		
0100020. 1958 CSO NLP 3.5% (68 - 81)	5,066,730		5,066,730		
0100021. 1958 CSO NLP 4% (68 - 04)	26,521,806		26,521,806		
0100022. 1980 CSO CRVM 3% (64 - 07)	7,604		7,604		
0100023. 1980 CSO CRVM 4% (92 - 09)	40,696,792		38,572,757		2,124,035
0100024. 1980 CSO CRVM 4.5% (95 - 07)	1,147,632,410		1,147,597,805		34,605
0100025. 1980 CSO CRVM 4.75% (99 - 05)	456,895		456,895		
0100026. 1980 CSO CRVM 5% (93 - 05)	54,696,084		54,688,209		7,875
0100027. 1980 CSO CRVM 5.25% (94 - 98)	4,503,390		4,503,390		
0100028. 1980 CSO CRVM 5.5% (85 - 00)	193,790,786		193,759,513		31,273
0100029. 1980 CSO CRVM 6% (84 - 02)	50,906,009		50,906,009		
0100030. Group - 2005 GTL - 4.00%	292,533				292,533
0100031. Unearned Premium	248				248
0100032. 80 CSO NLP 4.00% (1989-NB)	12,160,381		12,160,381		
0100033. 1980 CET CRVM 4% (85 - 06)	75,949		75,949		
0100034. 2001 CSO CRVM 4% (06 - NB)	50,385,447		50,385,447		
0100035. Group - Hunter's Disability - 3.00%	35,652				35,652
0100036. Group - 1970 Gp Life PW - 3.50%	671,081				671,081
0100037. Group - 1970 Gp Life PW - 4.50%	1,889,632				1,889,632
0100038. Group - 1970 Gp Life PW - 4.75%	1,239,876				1,239,876
0100039. Group - 1970 Gp Life PW - 5.00%	1,688,356				1,688,356
0100040. Group - 1970 Gp Life PW - 5.25%	853,552				853,552
0100041. Group - 1970 Gp Life PW - 5.50%	1,849,138				1,849,138
0100042. Group - 1970 Gp Life PW - 6.00%	1,257,698				1,257,698
0100043. Group - 1970 Gp Life PW - 6.50%	89,272				89,272
0100044. Group - 1970 Gp Life PW - 6.75%	59,901				59,901
0100045. Group - 1970 Gp Life PW - 7.25%	33,917				33,917
0100046. Group - Unreported Claims Estimate	29,000				29,000
0100047. Group Conversion Mortality 1959-1967 Inter Co Experience - 4.0%	107,838		107,838		
0100048. Group Conversion Mortality 1959-1967 Inter Co Experience - 4.5%	453,205		453,205		
0100049. Group Conversion Mortality 1968-1977 Inter Co Experience - 5.0%	37,790		37,790		
0100050. Group Conversion Mortality 1968-1977 Inter Co Experience - 5.5%	30,141		30,141		
0100051. Group Conversion Mortality 1968-1977 Inter Co Experience - 6.0%	272		272		
0100052. GIR - 41 CSO - 2.5%	1,188		1,188		
0100053. GIR - 58 CSO - 3.5%	22,083		22,083		
0100054. GIR - 58 CSO - 4.0%	32,044		32,044		
0199997. Totals (Gross)	1,752,112,424		1,739,924,780		12,187,644
0199998. Reinsurance ceded	271,186,493		271,040,226		146,267
0199999. Life Insurance: Totals (Net)	1,480,925,931		1,468,884,554		12,041,377
0200001. Deferred - Sinking Fund - 3.5% (1964-76)	3,638,466	XXX	3,638,466	XXX	
0200002. 1937 Standard 3% (1979-2005)	21,213	XXX		XXX	21,213
0200003. Progressive Annuity 3% (1974-75)	3,998	XXX	3,998	XXX	
0200004. Progressive Annuity 3.5% (1975-77)	441,966	XXX	441,966	XXX	
0200005. Deferred - 1971 IAM 4% (1977-80)	176,830	XXX	176,830	XXX	
0200006. Deferred - 1971 IAM 4.5% (1980-87)	4,563,522	XXX	4,563,522	XXX	
0200007. Deferred - 1971 IAM 5.25% (1994-2001)	253,810	XXX	253,810	XXX	
0200008. Deferred - 1971 IAM 5.5% (1993)	10,540	XXX	10,540	XXX	
0200009. Deferred - 1971 IAM 6% (1992)	1,657,181	XXX	74,135	XXX	1,583,046
0200010. Deferred - 1971 IAM 6.25% (1987, 90-91)	1,672,464	XXX	1,672,464	XXX	
0200011. Deferred - 1971 IAM 6.5% (1989)	764,944	XXX	764,944	XXX	
0200012. Deferred - 1971 IAM 6.75% (1986-88)	1,623,817	XXX	1,623,817	XXX	
0200013. Deferred - 1983 a - 7.25% (1986)	864,413	XXX	864,413	XXX	
0200014. Deferred - 1983 a - 7.0% (1988-89)	62,297,605	XXX	62,297,605	XXX	
0200015. Deferred - 1983 a - 6.75% (1988, 91)	27,111,929	XXX	27,111,929	XXX	
0200016. Deferred - 1983 a - 6.50% (1987, 89-90)	38,007,858	XXX	37,711,805	XXX	296,053
0200017. Deferred - 1983 a - 6.25% (1990-92)	69,700,297	XXX	69,700,297	XXX	
0200018. Deferred - 1983 a - 6.00% (1992-95)	56,300,228	XXX	56,300,228	XXX	
0200019. Deferred - 1983 a - 5.75% (1993, 95, 00)	55,893,192	XXX	55,893,192	XXX	
0200020. Deferred - 1983 a - 5.50% (1993-94, 96-98, 00-01)	211,398,047	XXX	211,398,047	XXX	
0200021. Deferred - 1983 a - 5.25% (1994, 96-99, 01)	82,926,029	XXX	82,926,029	XXX	
0200022. Deferred - 1983 a - 5.00% (1998-99, 08)	24,668,874	XXX	24,668,874	XXX	
0200023. Deferred - Annuity 2000 - 5.5% (2002)	132,106,073	XXX	132,106,073	XXX	
0200024. Deferred - Annuity 2000 - 5.25% (2002)	2,766,266	XXX	2,766,266	XXX	
0200025. Deferred - Annuity 2000 - 5.0% (2003, NB)	2,036,608,717	XXX	2,036,608,717	XXX	
0200026. Deferred - Annuity 2000 - 4.75% (2003-04, 2008)	2,002,556,640	XXX	2,002,556,640	XXX	
0200027. Deferred - Annuity 2000 - 4.5% (2005-2008)	564,059,458	XXX	564,059,458	XXX	

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**EXHIBIT 5 - AGGREGATE RESERVE FOR LIFE CONTRACTS**

1	2	3	4	5	6
Valuation Standard	Total	Industrial	Ordinary	Credit (Group and Individual)	Group
0200028. Deferred - 1963 Exp. Proj. - 4.75% (77-89)	69,512,823	XXX	69,451,390	XXX	61,433
0200029. Deferred - 1963 Exp. Proj. - 5.75% (1974-84)	198,109,605	XXX		XXX	198,109,605
0200030. Deferred - 1963 Exp. Proj. - 6.00% (1976-84)	5,199,968	XXX		XXX	5,199,968
0200031. Deferred - 1983 a Proj. 20 yrs w/G - 4.5% (1977, 79-94)	85,115,813	XXX	85,115,813	XXX	
0200032. Deferred - 1983 a Proj. 20 yrs w/G - 4.75% (1979, 81-82, 85-94)	265,552,754	XXX	265,552,754	XXX	
0200033. Deferred - 1983 a Proj. 20 yrs w/G - 4.5% CRVM (1995-NB)	230,289,224	XXX	230,289,224	XXX	
0200034. Deferred - 1983 a Proj. 20 yrs w/G - 4.75% CRVM (1995-2006)	102,300,708	XXX	102,300,708	XXX	
0200035. Deferred - 1983 GAM Proj. 20 yrs w/H - 4.5% (1984-NB)	83,782,223	XXX		XXX	83,782,223
0200036. Deferred - 1983 GAM Proj. 20 yrs w/H - 4.75% (1988-2004)	55,311,986	XXX		XXX	55,311,986
0200037. Deferred - 1983 GAM Proj. 20 yrs w/H - 5.75% (1985-2007)	422,253,709	XXX		XXX	422,253,709
0200038. Deferred - 1983 GAM Proj. 20 yrs w/H - 6.00% (1985-93)	2,155,176	XXX		XXX	2,155,176
0200039. Immediate - Sinking Fund - 3.5% (1964-79)	80,485	XXX	80,485	XXX	
0200040. Immediate - 1971 IAM - 5.5% (1980-81)	4,748,436	XXX	4,748,436	XXX	
0200041. Immediate - 1971 IAM - 7.5% (1980-81)	8,140,991	XXX	8,140,991	XXX	
0200042. Immediate - 1983 a - 3%-8% (1982-2004, 2006)	1,834,242	XXX	1,834,242	XXX	
0200043. Future Annuity Options	237	XXX	237	XXX	
0200044. 1971 IAM or Sinking Fund - 1982 ISSUES - 13.25%	9,152,955	XXX	9,152,955	XXX	
0200045. 1971 IAM or Sinking Fund - 1982 ISSUES - 12.50%	1,166,603	XXX	1,166,603	XXX	
0200046. 1971 IAM or Sinking Fund - 1982 ISSUES - 11.25%	1,438,982	XXX	1,438,982	XXX	
0200047. 1971 IAM or Sinking Fund - 1982 ISSUES - 8.75%	14,906,813	XXX	14,906,813	XXX	
0200048. 1971 IAM or Sinking Fund - 1983 ISSUES - 10.50%	2,455,184	XXX	2,455,184	XXX	
0200049. 1971 IAM or Sinking Fund - 1983 ISSUES - 10.00%	14,019,998	XXX	14,019,998	XXX	
0200050. 1971 IAM or Sinking Fund - 1983 ISSUES - 8.50%	2,239,497	XXX	2,239,497	XXX	
0200051. 1971 IAM or Sinking Fund - 1983 ISSUES - 7.00%	10,345,501	XXX	10,345,501	XXX	
0200052. 1971 IAM or Sinking Fund - 1984 ISSUES - 11.25%	44,989,348	XXX	44,989,348	XXX	
0200053. 1971 IAM or Sinking Fund - 1984 ISSUES - 10.75%	5,551,393	XXX	5,551,393	XXX	
0200054. 1971 IAM or Sinking Fund - 1984 ISSUES - 9.75%	7,676,904	XXX	7,676,904	XXX	
0200055. 1971 IAM or Sinking Fund - 1984 ISSUES - 7.50%	24,318,231	XXX	24,318,231	XXX	
0200056. 1983 a or Sinking Fund - 2005-07 ISSUES - 4.250%	430,903	XXX	430,903	XXX	
0200057. 1983 a or Sinking Fund - 2004, 2008 ISSUES - 4.500%	536,521	XXX	536,521	XXX	
0200058. 1983 a or Sinking Fund - 1998, 99, 2003, 05, 06, NB ISSUES - 4.750%	1,817,326	XXX	1,817,326	XXX	
0200059. 1983 a or Sinking Fund - 1994, 96, 2002, 04, 07, 08 ISSUES - 5.000%	5,247,016	XXX	5,247,016	XXX	
0200060. 1983 a or Sinking Fund - 1993, 97, 2000, 01, 05, 06 ISSUES - 5.250%	52,506,986	XXX	52,506,986	XXX	
0200061. 1983 a or Sinking Fund - 1995, 99, 2004, 07-NB ISSUES - 5.500%	153,703,710	XXX	153,703,710	XXX	
0200062. 1983 a or Sinking Fund - 2005-07 ISSUES - 5.750%	9,301,135	XXX	9,301,135	XXX	
0200063. 1983 a or Sinking Fund - 1987, 90, 91, 94, 96, 97, 2001, 2003, NB ISSUES - 6.000%	229,456,892	XXX	229,456,892	XXX	
0200064. 1983 a or Sinking Fund - 1988, 89, 93, 98, 99, 2000 ISSUES - 6.250%	209,909,543	XXX	209,909,543	XXX	
0200065. 1983 a or Sinking Fund - 1986, 94, 95, 2002 ISSUES - 6.500%	362,194,355	XXX	362,194,355	XXX	
0200066. 1983 a or Sinking Fund - 1992, 96, 97, 2000, 01 ISSUES - 6.750%	392,437,659	XXX	392,437,659	XXX	
0200067. 1983 a or Sinking Fund - 1993, 2000 ISSUES - 7.000%	412,520,542	XXX	412,520,542	XXX	
0200068. 1983 a or Sinking Fund - 1987, 90, 91, 95 ISSUES - 7.250%	228,974,508	XXX	228,974,508	XXX	
0200069. 1983 a or Sinking Fund - 1985 ISSUES - 7.500%	54,845,237	XXX	54,845,237	XXX	
0200070. 1983 a or Sinking Fund - 1987, 92 ISSUES - 7.750%	181,631,568	XXX	181,631,568	XXX	
0200071. 1983 a or Sinking Fund - 1986, 87 ISSUES - 8.000%	93,241,113	XXX	93,241,113	XXX	
0200072. 1983 a or Sinking Fund - 1990, 91 ISSUES - 8.250%	428,619,894	XXX	428,619,894	XXX	
0200073. 1983 a or Sinking Fund - 1986, 88, 89 ISSUES - 8.750%	565,603,757	XXX	565,603,757	XXX	
0200074. 1983 a or Sinking Fund - 1986 ISSUES - 9.250%	112,474,411	XXX	112,474,411	XXX	
0200075. 1983 a or Sinking Fund - 1985 ISSUES - 9.500%	23,336,055	XXX	23,336,055	XXX	
0200076. 1983 a or Sinking Fund - 1985 ISSUES - 10.500%	9,969,882	XXX	9,969,882	XXX	

**EXHIBIT 5 - AGGREGATE RESERVE FOR LIFE CONTRACTS**

1	2	3	4	5	6
Valuation Standard	Total	Industrial	Ordinary	Credit (Group and Individual)	Group
0200077. 1983 a or Sinking Fund - 1985 ISSUES - 11.000%	48,535,829	XXX	48,535,829	XXX	
0200078. 1994 GAR - 6.25% CARVM (1998, 1999)	108,951,567	XXX		XXX	108,951,567
0200079. 1994 GAR - 5.50% CARVM (1999)	47,160	XXX		XXX	47,160
0200080. 1994 GAR - 4.75% CARVM (1998, 1999)	167,240	XXX		XXX	167,240
0200081. 1994 GAR - 6.50% CARVM (2002)	6,911	XXX		XXX	6,911
0299997. Totals (Gross)	10,741,211,886	XXX	9,863,264,596	XXX	877,947,290
0299998. Reinsurance ceded	4,842,554	XXX	4,842,554	XXX	
0299999. Annuities: Totals (Net)	10,736,369,332	XXX	9,858,422,042	XXX	877,947,290
0300001. 1983 IAM 4% (1976, 1979, 1996)	103,552		103,552		
0399997. Totals (Gross)	103,552		103,552		
0399998. Reinsurance ceded					
0399999. SCWLC: Totals (Net)	103,552		103,552		
0400001. 1926-1933 I-D DI w/41 CSO - 2.5% (1957-62)	110		110		
0400002. 1926-1933 I-D DI w/41 CSO - 3.0% (1957-62)	464		464		
0400003. 1959 INTERCO DISA - 3.0% (1962-NB)	84,622		84,622		
0400004. 1959 ADB 1958 CSO 3%	195,000		195,000		
0400005. Unearned Premium	52,910		52,910		
0499997. Totals (Gross)	333,106		333,106		
0499998. Reinsurance ceded					
0499999. Accidental Death Benefits: Totals (Net)	333,106		333,106		
0500001. 1926 CLASS (3) w/41 CSO - 3.0% (1957-62)	332		332		
0500002. 150% MOD. CLASS (3) DISABILITY - 1941	917		917		
0500003. 1952 Period 2 - 1958 CSO 3%	481,000		481,000		
0500004. 1952 INTERCO DISA - 3.0% (1962-NB)	22,967		22,967		
0500005. Unearned Premium	242,146		242,146		
0599997. Totals (Gross)	747,362		747,362		
0599998. Reinsurance ceded	26		26		
0599999. Disability-Active Lives: Totals (Net)	747,336		747,336		
0600001. 1926 CLASS (3) w/41 CSO - 3.0% (1957-62)	4,676		4,676		
0600002. 1952 Period 2 3%	688,738		688,738		
0600003. 1952 INTERCO DISA - 3.0% (1962-NB)	3,749,775		3,749,775		
0600004. Hunters	189,410				189,410
0699997. Totals (Gross)	4,632,599		4,443,189		189,410
0699998. Reinsurance ceded					
0699999. Disability-Disabled Lives: Totals (Net)	4,632,599		4,443,189		189,410
0700001. For excess of valuation net premiums over corresponding gross premiums on respective policies, computed according to the standard of valuation required by this state.	30,225,574		21,171,275		9,054,299
0700002. For non-deduction of deferred fractional premiums or return of premiums at the death of the insured.	1,589,678		1,589,678		
0700003. Interest on Suspense and Holding Accounts	56,572		56,572		
0700004. AG 32 Reserve for Immediate Payment of Claims	5,454,549		5,452,227		2,322
0700005. AG 43 Aggregate Reinsurance Excess	4,277,348		4,268,895		8,453
0700006. Extra Mortality on Substandard Policies	972,177		972,177		
0700007. GIR - Extra Mortality on GIR options	3,451,095		3,451,095		
0799997. Totals (Gross)	46,026,993		36,961,919		9,065,074
0799998. Reinsurance ceded	5,588,628		5,588,628		
0799999. Miscellaneous Reserves: Totals (Net)	40,438,365		31,373,291		9,065,074
9999999. Totals (Net) - Page 3, Line 1	12,263,550,221		11,364,307,070		899,243,151

**EXHIBIT 5 - INTERROGATORIES**

- 1.1 Has the reporting entity ever issued both participating and non-participating contracts?..... Yes [ X ] No [ ]
- 1.2 If not, state which kind is issued.  
.....
- 2.1 Does the reporting entity at present issue both participating and non-participating contracts?..... Yes [ ] 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?..... Yes [ X ] No [ ]  
If so, attach a statement that contains the determination procedures, answers to the interrogatories and an actuarial opinion as described in the instructions.
4. Has the reporting entity any assessment or stipulated premium contracts in force? Yes [ ] No [ X ]  
If so, state:  
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.  
.....
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?..... Yes [ X ] No [ ]
- 6.1 If so, state the amount of reserve on such contracts on the basis actually held: ..... \$ ..... 997,660,672
- 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: ..... \$ ..... 1,122,765,792
- 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?..... Yes [ ] 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**

1 Description of Valuation Class	Valuation Basis		4 Increase in Actuarial Reserve Due to Change
	2 Changed From	3 Changed To	
<b>NONE</b>			
9999999 - Total (Column 4, only)			

**EXHIBIT 6 - AGGREGATE RESERVE FOR ACCIDENT AND HEALTH CONTRACTS**

	1 Total	2 Group Accident and Health	3 Credit Accident and Health (Group and Individual)	4 Collectively Renewable	Other Individual Contracts				
					5 Non-Cancelable	6 Guaranteed Renewable	7 Non-Renewable for Stated Reasons Only	8 Other Accident Only	9 All Other
<b>ACTIVE LIFE RESERVE</b>									
1. Unearned premium reserves .....	143,950	2,979				140,971			
2. Additional contract reserves (a) .....	4,142,003	2,344,637				1,797,366			
3. Additional actuarial reserves-Asset/Liability analysis .....									
4. Reserve for future contingent benefits .....									
5. Reserve for rate credits .....									
6. Aggregate write-ins for reserves .....									
7. Totals (Gross) .....	4,285,953	2,347,616				1,938,337			
8. Reinsurance ceded .....	64,316	9,012				55,304			
9. Totals (Net) .....	4,221,637	2,338,604				1,883,033			
<b>CLAIM RESERVE</b>									
10. Present value of amounts not yet due on claims .....	60,104,754	58,245,409				1,859,345			
11. Additional actuarial reserves-Asset/Liability analysis .....									
12. Reserve for future contingent benefits .....									
13. Aggregate write-ins for reserves .....									
14. Totals (Gross) .....	60,104,754	58,245,409				1,859,345			
15. Reinsurance ceded .....	58,886,304	58,231,409				654,895			
16. Totals (Net) .....	1,218,450	14,000				1,204,450			
17. TOTAL (Net) .....	5,440,087	2,352,604				3,087,483			
18. TABULAR FUND INTEREST .....	199,539	127,397				72,142			
<b>DETAILS OF WRITE-INS</b>									
0601. ....									
0602. ....									
0603. ....									
0698. Summary of remaining write-ins for Line 6 from overflow page .....									
0699. TOTALS (Lines 0601 thru 0603 plus 0698) (Line 6 above) .....									
1301. ....									
1302. ....									
1303. ....									
1398. Summary of remaining write-ins for Line 13 from overflow page .....									
1399. TOTALS (Lines 1301 thru 1303 plus 1398) (Line 13 above) .....									

(a) Attach statement as to valuation standard used in calculating this reserve, specifying reserve bases, interest rates and methods.



**EXHIBIT 7 - DEPOSIT TYPE CONTRACTS**

	1	2	3	4	5	6
	Total	Guaranteed Interest Contracts	Annuities Certain	Supplemental Contracts	Dividend Accumulations or Refunds	Premium and Other Deposit Funds
1. Balance at the beginning of the year before reinsurance .....	2,419,614,384	5,390,913	2,298,576,503	1,330,423	236,299	114,080,246
2. Deposits received during the year .....	113,535,158		89,649,816		3,536	23,881,806
3. Investment earnings credited to the account .....	148,303,071	296,501	143,034,339	40,916	16,543	4,914,772
4. Other net change in reserves .....						
5. Fees and other charges assessed .....						
6. Surrender charges .....						
7. Net surrender or withdrawal payments .....	372,353,957		341,260,137	264,214	2,281	30,827,325
8. Other net transfers to or (from) Separate Accounts .....						
9. Balance at the end of current year before reinsurance (Lines 1+2+3+4-5-6-7-8) .....	2,309,098,656	5,687,414	2,190,000,521	1,107,125	254,097	112,049,499
10. Reinsurance balance at the beginning of the year .....	(277,888)		(277,888)			
11. Net change in reinsurance assumed .....	(14,353)		(14,353)			
12. Net change in reinsurance ceded .....	(77,808)		(77,808)			
13. Reinsurance balance at the end of the year (Lines 10+11-12) .....	(214,433)		(214,433)			
14. Net balance at the end of current year after reinsurance (Lines 9 + 13)	2,308,884,223	5,687,414	2,189,786,088	1,107,125	254,097	112,049,499

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

**EXHIBIT 8 - CLAIMS FOR LIFE AND ACCIDENT AND HEALTH CONTRACTS**

**PART 1 - Liability End of Current Year**

	1 Total	2 Industrial Life	Ordinary			6 Credit Life (Group and Individual)	Group		Accident and Health		
			3 Life Insurance	4 Individual Annuities	5 Supplementary Contracts		7 Life Insurance	8 Annuities	9 Group	10 Credit (Group and Individual)	11 Other
1. Due and unpaid:											
1.1 Direct .....											
1.2 Reinsurance assumed .....											
1.3 Reinsurance ceded .....											
1.4 Net .....											
2. In course of settlement:											
2.1 Resisted .....	200,000		200,000								
2.11 Direct .....			200,000								
2.12 Reinsurance assumed .....											
2.13 Reinsurance ceded .....											
2.14 Net .....	200,000		(b) 200,000	(b)		(b)	(b)				
2.2 Other .....	33,573,574		15,569,668				85,200		17,918,706		
2.21 Direct .....			15,569,668				85,200		17,918,706		
2.22 Reinsurance assumed .....	64,376		64,376								
2.23 Reinsurance ceded .....	5,906,212		5,906,212								
2.24 Net .....	27,731,738		(b) 9,727,832	(b)		(b)	(b) 85,200		(b) 17,918,706	(b)	(b)
3. Incurred but unreported:											
3.1 Direct .....	88,649,623		3,207,000				1,612,808		83,593,815		236,000
3.2 Reinsurance assumed .....	102,510								102,510		
3.3 Reinsurance ceded .....	2,643,821						743,904		1,899,917		
3.4 Net .....	86,108,312		(b) 3,207,000	(b)		(b)	(b) 868,904		(b) 81,796,408	(b)	(b) 236,000
4. TOTALS .....	122,423,197		18,976,668				1,698,008		101,512,521		236,000
4.1 Direct .....	122,423,197		18,976,668				1,698,008		101,512,521		236,000
4.2 Reinsurance assumed .....	166,886		64,376						102,510		
4.3 Reinsurance ceded .....	8,550,033		5,906,212				743,904		1,899,917		
4.4 Net .....	114,040,050	(a)	(a) 13,134,832				(a) 954,104		99,715,114		236,000

(a) Including matured endowments (but not guaranteed annual pure endowments) unpaid amounting to \$ ..... in Column 2, \$ ..... in Column 3 and \$ ..... in Column 7.

(b) Include only portion of disability and accident and health claim liabilities applicable to assumed "accrued" benefits. Reserves (including reinsurance assumed and net of reinsurance ceded) for unaccrued benefits for Ordinary Life Insurance \$ .....  
 Individual Annuities \$ ..... , 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 \$ ..... 14,000  
 Credit (Group and Individual) Accident and Health \$ ..... , and Other Accident and Health \$ ..... 1,204,450 are included in Page 3, Line 2 (See Exhibit 6, Claim Reserve).

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**EXHIBIT 8 - CLAIMS FOR LIFE AND ACCIDENT AND HEALTH CONTRACTS**

**PART 2 - Incurred During the Year**

	1 Total	2 Industrial Life (a)	Ordinary			6 Credit Life (Group and Individual)	Group		Accident and Health		
			3 Life Insurance (b)	4 Individual Annuities	5 Supplementary Contracts		7 Life Insurance (c)	8 Annuities	9 Group	10 Credit (Group and Individual)	11 Other
1. Settlements During the Year:											
1.1 Direct	720,414,302		104,001,875	284,981,456	11,979	8,369,466	7,874,751	313,990,514		1,184,261	
1.2 Reinsurance assumed	713,697		475,341			86,850		151,506			
1.3 Reinsurance ceded	44,005,248		22,908,803	310,748		3,429,489		17,251,274		104,934	
1.4 Net (d)	677,122,751		81,568,413	284,670,708	11,979	5,026,827	7,874,751	296,890,746		1,079,327	
2. Liability December 31, current year from Part 1:											
2.1 Direct	122,423,197		18,976,668			1,698,008		101,512,521		236,000	
2.2 Reinsurance assumed	166,886		64,376					102,510			
2.3 Reinsurance ceded	8,550,033		5,906,212			743,904		1,899,917			
2.4 Net	114,040,050		13,134,832			954,104		99,715,114		236,000	
3. Amounts recoverable from reinsurers December 31, current year	1,745,173		592,016			248,277		898,619		6,261	
4. Liability December 31, prior year:											
4.1 Direct	130,171,875		12,318,913			1,611,284		115,979,678		262,000	
4.2 Reinsurance assumed	277,731		101,610					176,121			
4.3 Reinsurance ceded	5,079,881		2,159,834			713,619		2,206,428			
4.4 Net	125,369,725		10,260,689			897,665		113,949,371		262,000	
5. Amounts recoverable from reinsurers December 31, prior year	2,168,762		1,265,731			210,845		682,267		9,919	
6. Incurred Benefits											
6.1 Direct	712,665,624		110,659,630	284,981,456	11,979	8,456,190	7,874,751	299,523,357		1,158,261	
6.2 Reinsurance assumed	602,852		438,107			86,850		77,895			
6.3 Reinsurance ceded	47,051,811		25,981,466	310,748		3,497,206		17,161,115		101,276	
6.4 Net	666,216,665		85,116,271	284,670,708	11,979	5,045,834	7,874,751	282,440,137		1,056,985	

- (a) 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.
- (b) Including matured endowments (but not guaranteed annual pure endowments) amounting to \$ .....66,879 in Line 1.1, \$ .....66,879 in Line 1.4.  
 \$ .....66,879 in Line 6.1, and \$ .....66,879 in Line 6.4.
- (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.
- (d) Includes \$ .....393,813 premiums waived under total and permanent disability benefits.

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

**EXHIBIT OF NON-ADMITTED ASSETS**

	1	2	3
	Current Year Total Nonadmitted Assets	Prior Year Total Nonadmitted Assets	Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D) .....			
2. 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. Other invested assets (Schedule BA) .....			
8. Receivables for securities .....	4,865,217	50,328	(4,814,889)
9. Aggregate write-ins for invested assets .....			
10. Subtotals, cash and invested assets (Lines 1 to 9) .....	4,865,217	50,328	(4,814,889)
11. Title plants (for Title insurers only) .....			
12. Investment income due and accrued .....	5,077		(5,077)
13. Premiums and considerations:			
13.1 Uncollected premiums and agents' balances in the course of collection .....	2,387,036	1,364,663	(1,022,373)
13.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due .....			
13.3 Accrued retrospective premiums .....			
14. Reinsurance:			
14.1 Amounts recoverable from reinsurers .....			
14.2 Funds held by or deposited with reinsured companies .....			
14.3 Other amounts receivable under reinsurance contracts .....			
15. Amounts receivable relating to uninsured plans .....			
16.1 Current federal and foreign income tax recoverable and interest thereon .....			
16.2 Net deferred tax asset .....	34,734,427	83,827,472	49,093,045
17. Guaranty funds receivable or on deposit .....			
18. Electronic data processing equipment and software .....	1,607,389	5,087,381	3,479,992
19. Furniture and equipment, including health care delivery assets .....	4,655,495	5,191,463	535,968
20. Net adjustment in assets and liabilities due to foreign exchange rates .....			
21. Receivables from parent, subsidiaries and affiliates .....			
22. Health care and other amounts receivable .....			
23. Aggregate write-ins for other than invested assets .....	27,068,857	32,962,243	5,893,386
24. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 10 to 23) .....	75,323,498	128,483,550	53,160,052
25. From Separate Accounts, Segregated Accounts and Protected Cell Accounts .....			
26. Total (Lines 24 and 25)	75,323,498	128,483,550	53,160,052
<b>DETAILS OF WRITE-INS</b>			
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)			
2301. Intangible assets .....	15,319,753	20,905,037	5,585,284
2302. Accounts and notes receivable .....	8,442,030	9,315,572	873,542
2303. Other assets .....	3,279,007	2,686,096	(592,911)
2398. Summary of remaining write-ins for Line 23 from overflow page .....	28,067	55,538	27,471
2399. Totals (Lines 2301 thru 2303 plus 2398)(Line 23 above)	27,068,857	32,962,243	5,893,386

## NOTES TO FINANCIAL STATEMENTS

### 1. Summary of Significant Accounting Policies

#### A. Accounting Practices

The accompanying financial statements of Symetra Life Insurance Company (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 at either December 31, 2009 or 2008.

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 one percent (1%) of an insurer's assets. The Company, with the explicit permission of the Department is permitted to invest up to four percent (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, 2009 and 2008, the Company held \$94,920,630 or 0.46% and \$321,364,340 or 1.73%, respectively, of admitted assets in a single entity's mutual fund, JP Morgan Overnight Sweep. The Company has no other permitted practices.

#### B. Accounting Policy

##### Use of Estimates in the Preparation of the Financial Statements

The preparation of financial statements in conformity with Statutory Accounting Principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities. It also requires disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

#### C. Premiums are recognized annually on the policy anniversary for individual traditional life policies, consistent with the statutory reserving process. Premiums for universal life policies and annuity considerations are recognized when received. Amounts received under deposit-type contracts with no life contingencies, including guaranteed interest and certain group annuity contracts, are recorded as liabilities when received. Group life and health premiums are recognized when due. Expenses incurred in connection with acquiring new insurance business, including acquisition costs such as sales commissions, are charged to operations as incurred.

In addition, the Company uses the following accounting policies:

- (1) Short-term investments are stated at amortized cost.
- (2) Bonds not backed by other loans and hybrid bonds typically referred to as a capital security or as a trust preferred security are stated at amortized cost using the scientific method, except for those with an NAIC designation of 6, which are reported at lower or amortized cost or fair value.
- (3) Common stocks are stated at market value except for the investments in stocks of uncombined subsidiaries and affiliates in which the Company has an interest of 10% or more. (See #7 below).
- (4) Highest quality, high quality or medium quality redeemable preferred stocks (NAIC designations 1 to 3) which have characteristics of debt securities are valued at cost or amortized cost. All other redeemable preferred stocks (NAIC designations 4-6) are reported at the lower of cost, amortized cost or fair value.

Highest quality, high quality or medium quality perpetual preferred stocks (NAIC designations 1 to 3), which have characteristics of equity securities are valued at cost. All other perpetual preferred stocks (NAIC designations 4 to 6) are reported at the lower of cost or fair value.

- (5) Mortgage loans on real estate are carried at the aggregate unpaid balance.
- (6) Loan-backed securities are valued and reported in accordance with the NAIC Purposes and Procedures of the Securities Valuation Office (SVO) manual and Statement of Statutory Accounting Principles (SSAP) No. 43-Revised, *"Loan-backed and Structured Securities"*. Agency 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.

Non-agency residential mortgage-backed securities, subject to multiple NAIC designations, utilize a two-step method for determining carrying value. The first step compares the current amortized cost to the range of values assigned to the six NAIC designations for each security to establish the initial NAIC designation. Securities with an initial NAIC designation of 1 through 5, are reported at amortized cost using the retrospective methodology and securities with an initial NAIC designation of 6 are reported at the lower of amortized cost or fair value. The second step determines the final NAIC designation used for reporting by comparing the adjusted carrying value of the security from step one to the range of values assigned to the six NAIC designations for each security.

## NOTES TO FINANCIAL STATEMENTS

Agency loan-backed, non-agency residential mortgage-backed and structured securities, for which the fair value has declined below the amortized cost basis, are evaluated further to determine if the decline is other-than-temporary. When an other-than-temporary impairment has occurred due to the Company's intent to sell the security or the Company has assessed it does not have the intent and ability to retain the security until sufficient time to recover the amortized cost basis, the investments are written down and carried at fair value. When an other-than-temporary impairment has occurred because the Company does not expect to recover the entire cost basis, even if the Company has the intent and ability to hold, the investments are written down and carried at the present value of cash flows expected to be collected, discounted at the effective rate immediately prior to the recognition of the other-than-temporary impairment. For periods subsequent to the loss recognition, the prospective adjustment methodology is used to value the security and the new amortized cost basis is not adjusted for subsequent recoveries in fair value.

- (7) The Company carries subsidiaries, First Symetra National Life Insurance Company of New York and Symetra National Life Insurance Company at the equity method as described in part 8, section 3(ii)A of the Securities Valuation Handbook.

The Company carries affiliate Berkshire Hathaway, Inc. at the market valuation method as described in part 8 section 3(i) of the Securities Valuation Handbook.

- (8) At December 31, 2009, the Company was invested in twelve limited partnership interests related to low income housing and state tax credit funds, two of which were entered into during 2009. Annual amortization is based on the proportion of tax benefits received in the current year to total estimated tax benefits to be allocated to the Company. An offsetting amount is recorded in unrealized gains and losses on investments. These investments are reported in Other Invested Assets and included in Schedule BA. A liability is also recorded for the delayed equity contributions at the present value of these future contributions which are considered unconditional and legally binding.

- (9) All derivatives are stated at fair value.

- (10) The Company does not use anticipated investment income as a factor in the premium deficiency calculation.

- (11) For Medical Specific Stop Loss, the liabilities are calculated using a Gross Premium Valuation method, with assumptions and adequacy reviewed on a quarterly basis. In December 2008, we changed the methodology of calculating the Medical Aggregate Stop Loss liabilities from the factor method to the Gross Premium Valuation method (similar to the Medical Specific Stop Loss) with the assumptions to be reviewed annually. For Select Benefits and Group Term Life, the liabilities are a factor of premium as well as a policy level factor of expected claims. The factors are validated and reviewed annually for adequacy.

Liabilities for losses on individual disability income contracts are tabulated as the present value of expected future claim payments. Appropriate mortality, morbidity and interest assumptions are used in the calculations. Loss reserves are tabulated on a seriatim basis for each open claim.

- (12) The Company has not materially modified its capitalization policy from the prior year.

- (13) The Company has no pharmaceutical rebate receivables.

### 2. Accounting Changes and Correction of Errors

In accordance with the changes adopted by the NAIC's Hybrid RBC Working Group, the Company changed its categorization of hybrid securities as of January 1, 2009. These hybrid securities, also referred to as trust preferred securities and capital securities were previously reported as preferred stocks and their NAIC designation was reduced by one in the calculation of the asset valuation reserve. As of January 1, 2009, hybrid securities are reported as bonds with no reduction to their NAIC designation. The total carrying value of hybrid securities reported as preferred stocks at December 31, 2008 was \$497,050,593.

As required by SSAP No. 32, "*Investments in Preferred Stock*", hybrid securities classified as preferred stocks with NAIC designations 4 to 6 were previously reported at the lower of amortized cost or fair value. This resulted in a change in gross unrealized losses of \$20,462,054, decreasing surplus at December 31, 2008. As of January 1, 2009, hybrid securities are accounted for under SSAP No. 26, "*Bonds, excluding Loan-backed and Structured Securities*", which requires that securities with a NAIC designation of class 6 be reported at lower of amortized cost or fair value. This resulted in a release of the prior year's unrealized loss, which had a positive current year impact of \$20,462,054 to surplus.

The Company adopted SSAP No. 43-R, "*Loan-backed and Structured Securities*" 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*". It revised valuation and impairment requirements to be based on the present value of cash flows expected to recover the entire amortized cost basis, and requires securities that the Company intends to sell to be recorded at fair value. There is no cumulative effect on adoption of SSAP 43-R. The discount rate used to calculate the present value of the cash flows expected to be collected was the rate in effect before recognizing any other-than-temporary impairments.

## NOTES TO FINANCIAL STATEMENTS

The Company adopted SSAP No. 10R, "Income Taxes" as of December 31, 2009. This SSAP substantively revises SSAP No. 10 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 current recovery period of one year. In addition, SSAP No. 10R increases the limit for admissibility from the current 10% of adjusted Capital and Surplus to 15% for qualifying companies. Upon adoption of SSAP No. 10R, the Company recorded an adjustment of \$38,662,583 as an aggregate write-in for gains and losses in surplus. See Note 9A.

There were no changes in accounting principles during the year ended December 31, 2008.

There were no errors discovered during the year ended December 31, 2009.

During 2008, the Company discovered an error in the reporting of the Group Variable Annuities (Group VA) product for the year ending December 31, 2007. Group VA was reclassified as Deposit-type Contracts but should have been classified as Annuity Considerations since this product contains permanent guaranteed annuity purchase rates, which subjects the Company to mortality risk. The Group VA is in both the General Account and the Separate Accounts. In 2007, aggregate reserves for life contracts were understated and liability for deposit-type contracts were overstated by \$68,942,788. These lines were adjusted in 2008 to correct for this error. Premiums and annuity considerations for life contracts were understated by \$79,660,295 and surrender benefits and withdrawals for life contracts were understated by \$119,732,787. This was entirely offset by an overstatement in increase in aggregate reserves for life contracts of \$29,282,027, interest and adjustments on contracts or deposit-type contract funds of \$2,728,115, and Net transfers to Separate Accounts of \$8,062,350.

### 3. Business Combinations and Goodwill

Not applicable

### 4. Discontinued Operations

Not applicable

### 5. Investments

#### A. Mortgage Loans

- (1) The maximum and minimum lending rates for commercial mortgage loans made during 2009 were 7.94% and 6.00%, respectively. The maximum and minimum lending rates for commercial mortgage loans made during 2008 were 7.30% and 5.40%, respectively.
- (2) In 2009, the Company reduced interest rates on one mortgage loan. This performing loan was open to prepayment and would have paid off had we not negotiated the following interest rate reduction;

0.500%    \$    565,245 – 1 loan

In 2009, the Company placed one loan on interest only payments for six months. Subsequent to the loan being returned to normal payments, the borrower defaulted on the loan. Default interest rate was increased;

6.000%    \$    3,860,049 – 1 loan

In 2008, the company reduced interest rates on two mortgage loans. These two performing loans were open to prepayment and would have paid off had we not negotiated the following interest rate reductions;

1.125%    \$    348,650 – 1 loan

1.865%    \$    1,054,616 – 1 loan

- (3) The maximum percentage of any one loan to the value of the security at the time of the loan, exclusive of insured, or guaranteed or purchase money mortgages was 65.6%.
- (4) The Company held no mortgages with interest more than 180 days past due at December 31, 2009 or December 31, 2008.
- (5) The Company paid no taxes, assessments or advances that were not included in the mortgage loan total at December 31, 2009.
- (6) The Company had no impaired loans with a related allowance for credit losses at December 31, 2009 or 2008.
- (7) The Company had one impaired loan without an allowance for credit losses with a book value of \$1,670,000 at December 31, 2009 and no impaired loans at December 31, 2008.
- (8) The average recorded investment in impaired loans was \$2,765,025 and \$0 as of December 31, 2009 and 2008, respectively
- (9) Interest income recognized during the period the loans were impaired – None.
- (10) Amount of interest income recognized on a cash-basis during the period the loans were impaired - None.
- (11) Activity in the allowance for credit losses accounts – None.
- (12) The Company recognizes interest income on its impaired loans upon receipt.

## NOTES TO FINANCIAL STATEMENTS

### B. Debt Restructuring

- (1) The Company had no investments in restructured loans as of December 31, 2009.
- (2) Realized capital losses related to restructured loans – Not applicable.
- (3) The Company does not have any commitments to lend additional funds related to restructured loans or securities.
- (4) The Company accrues interest income on impaired loans to the extent it is deemed collectible (delinquent less than 90 days) and the loan continues to perform under its original or restructured contractual terms. Interest income on non-performing loans is generally recognized on a cash basis.

### C. Reverse Mortgages

The Company has no investments in reverse mortgages.

### D. Loan-Backed Securities

- (1) The December 31, 2009 admitted and fair values associated with the Company's loan-backed securities are as follows:

	<b>Statement (Admitted) Value</b>	<b>Fair Value</b>	<b>Excess of Statement over Fair Value (-) or Fair Value over Statement (+)</b>
Mortgage-backed securities	\$ 3,728,439,997	\$ 3,724,569,035	\$ (3,870,962)
<b>Total</b>	<b>\$ 3,728,439,997</b>	<b>\$ 3,724,569,035</b>	<b>\$ (3,870,962)</b>

In accordance with the NAIC Purposes and Procedures of the SVO manual, fair values reflect the price 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 obtained from pricing services or public market information to determine the fair value of its loan-backed securities when such information is available. When such information is not available for investments, the Company uses other valuation techniques. Such techniques include evaluating discounted cash flows, identifying comparable securities with quoted market prices, and using internally prepared valuations based on modeling and pricing methods.

- (2) Prepayment assumptions for single-class and multi-class mortgage-backed securities are obtained primarily from broker dealer survey values or internal estimates when survey values are not available.
- (3) Following are the 10 largest exposures to a single issuer, excluding U.S. government and U.S. government agency securities:

<b>Issuer</b>	<b>Book / Adjusted Carrying Value</b>
Morgan Stanley Capital I	\$ 189,950,875
Bear Stearns Commercial Mortgage	184,914,457
Countrywide Home Loan Mortgage	182,573,763
Greenwich Capital Commercial	104,688,913
GS MTG SEC CORP II	75,325,152
LB-UBS Commercial Mortgage Trust	64,489,952
Citigroup Commercial Mortgage	58,559,430
Wachovia Bank Commercial Mortgage	46,382,763
Commercial Mtg Pass-Through Certificates	45,386,540
Countrywide Alt. Loan Trust	35,326,850
	<b>\$ 987,598,695</b>



## NOTES TO FINANCIAL STATEMENTS

(4) Other –than- temporary impairments (OTTI) for loan-backed securities recognized in the current quarter are as follows:

	Amortized Cost Basis Before OTTI	OTTI Recognized in Loss		Book/Adjusted Carrying Value	Fair Value at Time of Impairment
		Interest	Non-interest		
Mortgage-Backed Securities					
Aggregate PV of Cash Flows	\$ 206,425,914	\$ -	\$ 13,298,551	\$ 192,127,363	\$156,392,630
<b>Total</b>	<b>\$ 206,425,914</b>	<b>\$ -</b>	<b>\$ 13,298,551</b>	<b>\$ 193,127,363</b>	<b>\$156,392,630</b>

(5) Loan-backed securities with prior other-than-temporary impairments (OTTI) currently held by the reporting entity as the present value of cash flows expected to be collected:

CUSIP	Book/Adj Carrying Value Amortized Cost before Current Period OTTI	Projected Cash Flows	Recognized OTTI	Amortized Cost after OTTI	Fair Value at Time of Impairment
02149DAJ8	\$ 16,391,766	\$ 14,202,559	\$ 2,189,207	\$ 14,202,559	\$ 11,468,675
02149DAJ8	13,715,616	13,075,372	640,244	13,075,372	10,559,854
05952FAE3	34,336,848	33,946,299	390,549	33,946,299	33,946,299
05952FAE3	25,175,155	24,532,842	642,313	24,532,842	22,951,044
05952FAE3	19,698,937	17,172,793	2,526,144	17,172,793	18,832,928
12545CAD2	14,406,280	12,872,641	1,533,639	12,872,641	10,332,854
12613YAB5	6,290,487	6,135,780	154,707	6,135,780	3,770,309
12667F6C4	9,322,882	9,148,753	174,129	9,148,753	4,396,129
126694W46	13,353,227	12,578,751	774,476	12,578,751	8,729,940
126694W79	16,159,185	14,621,308	1,537,877	14,621,308	6,568,734
126694X52	8,081,983	7,647,295	434,688	7,647,295	4,693,807
161630BX5	2,450,849	2,317,117	133,732	2,317,117	2,011,107
32056FAD4	9,270,761	8,085,888	1,184,873	8,085,888	8,326,062
395386AP0	15,517,666	15,146,710	370,956	15,146,710	11,310,570
46630UAC8	12,841,287	11,588,885	1,252,402	11,588,885	9,517,990
9292272X3	2,304,087	2,192,641	111,446	2,192,641	1,738,159
<b>Total</b>	<b>\$ 219,317,016</b>	<b>\$ 205,265,634</b>	<b>\$ 14,051,382</b>	<b>\$ 205,265,634</b>	<b>\$ 169,154,461</b>

(6) The aggregate amount of gross unrealized losses and corresponding fair values for loan-backed securities are as follows:

	Gross Amortized Costs	Gross Unrealized Gains	Gross Unrealized Losses	Fair Value
Mortgage-backed securities	\$ 3,728,439,997	\$ 136,921,166	\$ (140,792,128)	\$ 3,724,569,035
<b>Total</b>	<b>\$ 3,728,439,997</b>	<b>\$ 136,921,166</b>	<b>\$ (140,792,128)</b>	<b>\$ 3,724,569,035</b>

	Less Than 12 Months		12 Months or More		Total	
	Fair Value	Gross Unrealized Losses	Fair Value	Gross Unrealized Losses	Fair Value	Gross Unrealized Losses
Mortgage-backed securities	\$ 344,978,082	\$ (7,497,667)	\$ 866,284,040	\$ (133,294,461)	\$ 1,211,262,122	\$ (140,792,128)
<b>Total</b>	<b>\$ 344,978,082</b>	<b>\$ (7,497,667)</b>	<b>\$ 866,284,040</b>	<b>\$ (133,294,461)</b>	<b>\$ 1,211,262,122</b>	<b>\$ (140,792,128)</b>

## NOTES TO FINANCIAL STATEMENTS

(7) We analyze investments in loan-backed securities that meet our impairment criteria to determine whether the decline in value is other-than-temporary. To make this determination for each security, we consider both quantitative and qualitative criteria including:

- How long and by how much the fair value has been 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 or earnings potential, or compliance with terms and covenants of the security;
- Any downgrades of the security by a rating agency;
- Any reduction or elimination of dividends or nonpayment of scheduled interest payments; and
- Our intent to sell the security 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.

(8) Not applicable

E. Repurchase Agreements

The Company has no investments in repurchase agreements.

F. Real Estate

The Company has no investments in real estate.

G. Investments in low-income housing tax credits (LIHTC)

(1) The Company's LIHTC Investments are as follows:

LIHTC Investment	Remaining Years of Unexpired Credits*	Remaining Required Holding Period
MMA Financial Institutional Tax Credits XXXII	11 Years	15 Years
MMA Financial Institutional Tax Credits XXX	9 Years	14 Years
Centerline Corporate Partners XXX, LP	9 Years	13 Years
PNC MultiFamily Capital Institutional Fund XXXV	11 Years	15 Years
Centerline Corporate Partners, XXI, LP	8 Years	9 Years
Centerline Corporate Partners, XXXV, LP	10 Years	15 Years
USA Institutional Tax Credit Fund LXXII, LP	12 Years	16 Years

\* Does not include carryforward provisions in IRC Section #39.

- (2) The LIHTC property is not currently subject to any regulatory review.
- (3) The Company's aggregate investments in low-income housing tax credits does not exceed 10% of its admitted assets.
- (4) Impairment loss for its investments in LIHTC - Not applicable.
- (5) Write-downs for investments in LIHTC - Not applicable.

### 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 during the statement periods.

### 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, with the exception of mortgage loans in default. See Note B.

B. Investment income due and accrued excluded from surplus was \$5,077 and \$50,238 as of December 31, 2009 and 2008, respectively.

### 8. Derivative Instruments

- A. B. and C. In 1997 the Company introduced an equity indexed annuity product that credits the policyholder based on a percentage of the gain in the S&P 500 index. In connection with this product, the Company has a program which consists of buying over-the-counter S&P 500 index call options with the objective to mitigate the exposure to changes in the S&P 500 index. Sales of the equity indexed annuity product were suspended in the fourth quarter of 1998. These call options are not effective hedges according to the criteria in SSAP 86 and are therefore recorded at fair value in aggregate write-ins for invested assets. Related gains or losses on expired, sold or exercised options are recorded as realized gains or losses in the Statement of Operations.

**NOTES TO FINANCIAL STATEMENTS**

The Company is exposed to credit related losses in the event of non-performance by counterparties to the S&P 500 index call options. The risk is mitigated through credit review, approval controls and by entering the agreements with only highly rated counterparties.

The Company has no market risk on its equity indexed annuity product because this risk is mitigated by the options mentioned above.

D. Unrealized net gain or loss from derivative instruments excluded from assessment of hedge effectiveness - Not applicable.

E. Unrealized net gain or loss from derivatives no longer qualifying for hedge accounting - Not applicable.

F. Derivatives accounted for as cash flow hedges of a forecasted transaction - Not applicable

**9. Income Taxes****A. Deferred Tax Components**

	<u>12/31/2009</u>	<u>12/31/2009</u>
1. Gross Deferred Tax Assets – Ordinary	\$ 115,556,126	\$ 133,800,503
2. Gross Deferred Tax Assets – Capital	46,636,754	34,964,142
3. Total Gross Deferred Tax Assets	<u>162,192,880</u>	<u>168,764,645</u>
4. Statutory Valuation Allowance – Ordinary	-	-
5. Statutory Valuation Allowance – Capital	-	-
6. Adjusted Gross Deferred Tax Assets	<u>162,192,880</u>	<u>168,764,645</u>
7. Deferred Tax Liabilities – Ordinary	(46,374,814)	(42,134,045)
8. Deferred Tax Liabilities – Capital	-	-
9. Net Deferred Tax Asset (Liability)	<u>115,818,066</u>	<u>126,630,600</u>
10. Deferred Tax Assets Nonadmitted – Ordinary	(16,010,411)	(59,194,489)
11. Deferred Tax Assets Nonadmitted – Capital	<u>(18,724,016)</u>	<u>(24,632,983)</u>
12. Total Deferred Tax Assets Admitted (per SSAP No.10R)	\$ 81,083,639	\$ 42,803,128
13. (Incr.) Decr. in Deferred Tax Assets - Nonadmitted	<b>\$ 49,093,045</b>	<b>\$ (43,924,032)</b>

**SSAP No. 10R Election**

The Company has elected to admit deferred tax assets pursuant to paragraph 10.e. of SSAP No.10R. This is the first year the company is eligible to make this election. As a result, the prior years' admitted deferred tax assets were calculated pursuant to paragraphs 10.a through 10.c.

**Increased Admitted Amount Under Paragraph 10.e.**

	<u>12/31/2009</u>	<u>12/31/2008</u>	<u>Change</u>
Increased amt of admitted assets under paragraph 10.e. - Ordinary	\$ 25,060,032	\$ 0	\$ 25,060,032
Increased amt of admitted assets under paragraph 10.e. - Capital	13,602,551	0	13,602,551
Total increased amount of admitted assets under paragraph 10.e.	<u>\$ 38,662,583</u>	<u>\$ 0</u>	<u>\$ 38,662,583</u>

**Summary of Admitted Adjusted Gross Deferred Tax Assets**

	<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
Amount admitted under paragraph 10.a.	\$ 23,492,884	\$ 18,928,172	\$ 42,421,056
Amount admitted under paragraph 10.b.i.	0	0	0
Amount admitted under paragraph 10.c.	46,374,814	0	46,374,814
Total admitted under paragraphs 10.a. through 10.c.	<u>\$ 69,867,698</u>	<u>\$ 18,928,172</u>	<u>\$ 88,795,870</u>
Amount admitted under paragraph 10.e.i.	\$ 48,552,916	\$ 32,530,723	\$ 81,083,639
Amount admitted under paragraph 10.e.ii.a.	0	0	0
Amount admitted under paragraph 10.e.iii.	46,374,814	0	46,374,814
Total admitted under paragraphs 10.a. through 10.c.	<u>\$ 94,927,730</u>	<u>\$ 32,530,723</u>	<u>\$ 127,458,453</u>
Additional amount admitted under paragraph 10.e.	<u>\$ 25,060,032</u>	<u>\$ 13,602,551</u>	<u>\$ 38,662,583</u>
Ten percent of statutory surplus under paragraph 10.b.ii.	\$ 129,200,344		
Fifteen percent of statutory surplus under paragraph 10.e.ii.b.	\$ 193,800,515		
<b>Risk Based Capital Amount Utilized in Paragraph 10.d.</b>			
Total Adjusted Capital	\$ 1,497,202,352		
Authorized Control Level	\$ 183,748,589		

**NOTES TO FINANCIAL STATEMENTS****Increased Amount of Admitted DTAs, Admitted Assets, Statutory Surplus, and Total Adjusted Capital**

	<b>SSAP No. 10R Paragraphs 10.a.- 10.c.</b>	<b>SSAP No. 10R Paragraph 10.e.</b>	<b>Increased Amount</b>
Admitted Deferred Tax Assets	\$ 88,795,870	\$ 127,458,453	\$ 38,662,583
Admitted Assets	\$ 20,760,421,521	\$ 20,799,084,104	\$ 38,662,583
Statutory Surplus	\$ 1,376,772,522	\$ 1,415,435,105	\$ 38,662,583
Total Adjusted Capital	\$ 1,497,202,352	\$ 1,535,864,935	\$ 38,662,583

**B. Deferred Tax Liabilities are not recognized for the following amounts:**

The Company has no Deferred Tax Liabilities which have not been recognized.

**C. Current income taxes incurred consist of the following major components:**

	<b><u>12/31/2009</u></b>	<b><u>12/31/2008</u></b>
<b>Current Income Taxes:</b>		
Current Year Tax Provision Before Tax Credits	\$ 45,151,213	\$ 26,755,215
Tax Credits	(9,570,102)	(8,521,307)
Additional Provided	0	(321,621)
Prior Year Under/(Over) Accrual	(4,839,268)	(2,963,089)
<b>Income Tax Expense From Operations</b>	<b>30,741,843</b>	<b>14,949,198</b>
Taxes on Capital Gains/(Losses)	(21,327,802)	8,326,263
<b>Current Income Taxes Incurred</b>	<b><u>\$ 9,414,041</u></b>	<b><u>\$ 23,275,461</u></b>

**The main components of deferred tax amounts are as follows:**

	<b><u>12/31/2009</u></b>	<b><u>12/31/2008</u></b>	<b><u>Net Change</u></b>
<b>Assets</b>			
Fixed Assets/Intangibles	\$ 8,603,126	\$ 8,908,189	\$ (305,063)
Investments	47,149,416	39,508,692	7,640,724
Non-Admitted Assets	8,842,485	8,312,865	529,620
Proxy DAC	46,406,387	43,760,771	2,645,616
Reserves	37,870,713	35,429,926	2,440,787
Benefit Accruals	1,247,645	1,194,475	53,170
Unrealized Capital Losses	10,707,956	30,637,914	(19,929,958)
All Others	1,365,153	1,011,813	353,340
<b>Total Deferred Tax Assets</b>	<b><u>\$ 162,192,881</u></b>	<b><u>\$ 168,764,645</u></b>	<b><u>\$ (6,571,764)</u></b>
<b>Total Deferred Tax Asset – Nonadmitted</b>	<b><u>\$ 34,734,427</u></b>	<b><u>\$ 83,827,472</u></b>	<b><u>\$ (49,093,045)</u></b>
<b>Liabilities</b>			
Investments	21,247,291	14,202,359	7,044,932
Deferred Premium/Loading	16,478,202	17,436,813	(958,611)
Reserves	7,509,493	9,049,321	(1,539,828)
All Others	1,139,828	1,445,552	(305,724)
<b>Total Deferred Tax Liabilities</b>	<b><u>\$ 46,374,814</u></b>	<b><u>\$ 42,134,045</u></b>	<b><u>\$ 4,240,769</u></b>
<b>Net Change in Deferred Tax Asset (Liability)</b>			<b><u>\$ (10,812,533)</u></b>
<b>Surplus/Other Adjustments:</b>			
Tax effect of change in unrealized capital gains (losses)			19,929,958
Tax effect of change in nonadmitted assets			(529,620)
Change in Reserve Method Run Through Surplus			175,919
Adjustments to Prior Year Net Deferred Tax Assets			5,308,013
<b>Change in Net Deferred Income Taxes</b>			<b><u>\$ 14,071,738</u></b>

No adjustments were made to the Company's gross deferred tax assets because of a change in circumstances. As a result, the Company expects it will fully realize the deferred tax assets and no statutory valuation allowance has been recorded as of December 31, 2009.

**NOTES TO FINANCIAL STATEMENTS****D. Significant Statutory to Tax Adjustments on Current Taxes:**

	<u>12/31/2009</u>	<u>12/31/2008</u>
Ordinary Income Tax at Federal Statutory rate (35%)	\$ 56,073,039	\$ 39,960,728
Capital Income Tax at Federal Statutory rate (35%)	<u>(37,963,241)</u>	<u>(12,482,636)</u>
<b>Total Income Tax</b>	<b>\$ 18,109,798</b>	<b>\$ 27,478,092</b>
Dividends Received Deduction	(1,470,000)	(1,365,000)
Tax Exempt Income	(129,500)	(133,000)
Tax Credits	(9,570,102)	(8,521,307)
Other Permanent Items	181,013	224,416
Change in IMR	(6,939,639)	(7,026,704)
Prior Year Adjustments	(4,839,268)	(2,963,089)
Additional Provided	0	(321,621)
All Other Adjustments	<u>1</u>	<u>(1)</u>
<b>Federal Income Tax Expense (Benefit)</b>	<b>\$ (4,657,697)</b>	<b>\$ 7,371,786</b>
<b>Federal &amp; Foreign Taxes Incurred</b>	<b>\$ 9,414,041</b>	<b>\$ 23,275,461</b>
<b>Change in Net Deferred Income Taxes</b>	<b><u>(14,071,738)</u></b>	<b><u>(15,903,675)</u></b>
<b>Total Statutory Income Taxes</b>	<b>\$ (4,657,697)</b>	<b>\$ 7,371,786</b>

E. (1) The Company files a life insurance consolidated tax return with its subsidiary life insurance companies. As a result, any loss carryforwards are calculated on a consolidated basis. As of December 31, 2009, the consolidated return had no loss carryforwards estimated.

(2) The amount of federal income taxes incurred are available for recovery in the event of the carryback of future net losses is as follows:

	<b>2009</b>	<b>2008</b>	<b>2007</b>
Ordinary Income	\$ 35,581,111	\$ 11,977,589	\$ 40,535,756
Capital Gain	n/a	\$ 10,714,470	\$ 33,123,437

(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 with the following entities:

Symetra National Life Insurance Company  
First Symetra National Life Insurance Company of New York

(2) The method of allocation between the companies is subject to written agreement, approved by the Board of Directors. Allocation is based upon 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, 2003. The Internal Revenue Service is in the process of auditing the Company's returns for the tax year ended July 31, 2004 filed in consolidation with the Company's former parent, Safeco Corporation. To date, no significant or proposed adjustments have been raised by the examiners. The Internal Revenue Service has also completed an audit of the Company's returns and the statute of limitations has closed for the years ended December 31, 2004 and 2005.

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

A. B. and C. The following material related party transactions, excluding reinsurance transactions and any non-insurance transactions that were less than 1/2 of 1% of the Company's admitted assets, were entered into by the Company with an affiliate:

**During the year ended December 31, 2009:**

On May 5, 2009, the Company received \$101,984,661 in the form of mortgage backed securities with a book value of \$101,902,161 and accrued interest of \$82,500 from Symetra Financial, its parent.

On November 25, 2009, the Company received a cash dividend of \$1,000,000 from Symetra National Life Insurance Company, its subsidiary.

On December 7, 2009, the Company paid a cash contribution of \$20,000,000 to First Symetra National Life Insurance Company of New York, its subsidiary.

## NOTES TO FINANCIAL STATEMENTS

On December 31, 2009, the Company received \$83,604 in the form of fixed assets from Symetra Financial, its parent.

In 2009, the Company transferred \$47,618,292 in assets (including cash) and related reserves to Separate Accounts from the General Account due to bank-owned life insurance customers electing to transfer their General Account policy to a Separate Account policy through a policy endorsement. The related invested assets supporting the reserves were transferred. The transfers resulted in a reduction primarily of bonds.

### During the year ended December 31, 2008:

On December 2, 2008 the Company paid a cash contribution of \$20,000,000 to First Symetra National Life Insurance Company of New York, its subsidiary.

On December 22, 2008, the Company received \$50,000,000 from Symetra Financial, its parent. The contribution received is as follows: \$49,729,250 bonds, \$150,431 in accrued interest, and \$120,319 in cash.

The Company paid the following dividends to Symetra Financial Corporation, its parent.

Date	Transaction Explanation	Insurer Name	Affiliate Name	Statement Value	Asset Received	Asset Transferred
March 27, 2008	Extraordinary Dividend	Symetra Life Insurance Co	Symetra Financial Corp.	\$40,000,000		Cash
June 23, 2008	Extraordinary Dividend	Symetra Life Insurance Co	Symetra Financial Corp	\$30,000,000		Cash
September 19, 2008	Extraordinary Dividend	Symetra Life Insurance Co	Symetra Financial Corp.	\$30,000,000		Cash

In 2008, the Company transferred \$44,734,105 in assets (including cash) and related reserves to Separate Accounts from the General Account due to bank-owned life insurance customers electing to transfer their General Account policy to a Separate Account policy through a policy endorsement. The related invested assets supporting the reserves were transferred. The transfers resulted in a reduction primarily of bonds.

- D. As of December 31, 2009 and 2008, the Company reported the following amounts due (to)/from an affiliated company, which are generally settled within 30 days:

	<u>12/31/09</u>	<u>12/31/08</u>
Symetra Financial Corporation	\$ (19,611,714)	\$ (18,019,480)
White Mountains Advisors, LLC	(3,319,661)	(3,194,838)
Symetra Life Separate Accounts	25,482,468	6,873,618
Symetra Services Corporation	0	4,296
Symetra Investment Services	251,672	344,003
Symetra Assigned Benefits Service Company	(348,824)	(242,814)
Symetra National Life Insurance Company	20,232	39,187
First Symetra National Life Insurance Co of NY	318,412	205,368
Symetra Administrative Services	(1,773)	15,558
Symetra Securities, Inc.	41,160	33,727
TFS Training & Consulting	3,747	1,361
Clearscape Funding Corporation	93,297	47,550
Medical Risk Managers, Inc.	(905,392)	(232,167)
Health Network Strategies, LLC	86	0
TIF Investment LLC	62,978	0
<b>Total</b>	<b><u>\$ 2,086,688</u></b>	<b><u>\$ (14,124,631)</u></b>

As of December 31, 2009 and 2008, payables in the amount of (\$20,009,096) and (\$17,937,105), respectively included in the balances owed to Symetra Financial Corporation are for performance share plan expense and will be settled according to the terms of that agreement. See Note 12D.

- E. The company has not agreed to any guarantees for affiliates that result in a material contingent exposure.
- F. The Company entered into 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 the expenses thereof. The agreement was effective December 15, 2005, following prior notice of the transaction to the Washington Office of Insurance Commissioner pursuant to insurance holding company law.

Under a separate agreement the Company performs administrative and special services for First Symetra National Life Insurance Company of New York as stated in the Administrative Services Agreement, dated November 1, 1998, filed with the New York State Insurance Department.

## NOTES TO FINANCIAL STATEMENTS

White Mountains Advisors LLC has agreed to perform investment advisory services for the Company under the executed Investment Management Agreement dated March 14, 2004, as amended.

Symetra Assigned Benefits Service Company (SABSCO), an affiliate of the Company, purchased at a discount from third-party payees future payment streams from structured settlement annuity contracts assigned to and owned by SABSCO and issued by the Company. The payments to annuitants totaled \$60,463,906 and \$53,140,331 during the years ended December 31, 2009 and 2008, respectively. The Company, in turn, issued commutation endorsements to SABSCO to commute the payment streams in the structured settlement annuity contracts. During the years ended December 31, 2009, and 2008, the Company paid \$59,737,590, and \$43,121,598, respectively, to SABSCO related to the commutation endorsements.

- G. All outstanding shares of the 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 Symetra Financial Corporation.
- I. None of the Company's investments in Subsidiary, Controlled or Affiliated Companies (SCAs) exceed 10% of its admitted assets.
- J. The Company did not recognize any impairment write down for its investments in SCA's during the statement period.
- K. Investments in foreign insurance subsidiaries - Not applicable.
- L. 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. Retirement Plan

The Company sponsors a defined contribution plan. The plan covers substantially all employees. The Company's contributions to the plan are made in cash.

The defined contribution plan is a 401(k) plan that includes an immediate safe harbor matching contribution of 100% of a participant's contribution, up to 6% of eligible compensation. The Company's share of expenses for the plan was \$3,811,673 and \$4,093,215 for the years ended December 31, 2009 and December 31, 2008, respectively.

The plan includes automatic enrollment and automatic increase features.

- C. The Company does not participate in a multi-employer plan.
- D. Holding Company Plan

The Company participates in a performance share plan (the "Performance Share Plan"), which was adopted by the Company's parent in 2004, that provides incentives to selected executives based on the long-term success of the Company. Awards under the Performance Share Plan are typically made in the form of performance shares with a three-year award period. The value of each performance share is at the discretion of the Symetra Financial Corporation's Board of Directors and is based on achievement of a growth target in intrinsic business value and awards paid in cash. The expense recorded for grants made under the Performance Share Plan was \$8,290,668 and \$5,977,901 for the years ended December 31, 2009, and 2008, respectively.

The Company does not offer any healthcare, life insurance, or post-retirement benefits to retired employees.

- E. The Company does not participate in a cash balance or post employment benefit plan.
- F. There is no impact from the Medicare Modernization Act since the Company does not sponsor 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, \$250 per share par value. There are no other classes of capital stock.
- (2) The Company has no preferred stock.

## NOTES TO FINANCIAL STATEMENTS

- (3) The Company is restricted as to the amount that can be paid to its shareholder without prior approval of the State of Washington Office of Insurance Commissioner. This restriction is the greater of statutory net gain from operations for the previous year or 10% of policyholder 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 2010 is \$141,543,511.
- (4) The Company paid dividends of \$0 and \$100,000,000 during the years ending December 31, 2009 and December 31, 2008. A dividend schedule is provided in Note 10.
- (5) Within the limitations of (3) above, there are no restrictions placed on a portion of Company profits that may be paid as ordinary dividends to its shareholder.
- (6) The unassigned surplus funds were earned partly through the income of participating and nonparticipating policies. Restricted surplus held for the benefit of participating policyholders for the years ended December 31, 2009 and 2008 was \$519,735 and \$489,302, respectively, with the remainder being held for the benefit of the Company's shareholder.
- (7) There have been no advances to surplus.
- (8) The Company holds no stock for special purposes.
- (9) The increase in special surplus funds of \$38,662,583 was due to the implementation of SSAP No. 10R, *Income Taxes*, on December 31, 2009.
- (10) The increase (decrease) of unassigned funds (surplus) due to cumulative unrealized gains (losses) of (\$27,340,787) and (\$82,879,164) amounted to (\$55,538,376) ((\$35,609,080) - net of tax) and (\$112,267,225) ((\$73,649,730 - net of tax) at December 31, 2009 and December 31, 2008, respectively.
- (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.

The Company had unfunded mortgage commitments of \$4,010,000 and \$9,000,000 at December 31, 2009 and December 31, 2008, respectively.

- B. The Company is subject to guaranty fund and other assessments by the states in which it writes business. Guaranty fund assessments are accrued at the time of insolvencies as they become known to the Company and if they are material. Other assessments are accrued at the time of assessment, or, in the case of loss-based assessments, at the time the losses are incurred. Based upon information provided by the National Organization of Life and Health Insurance Guaranty Association (NOLHGA), the Company has accrued a liability for guaranty fund assessments of \$11,474,726 and a related premium tax benefit asset of \$7,983,460. The amounts represent management's best estimates based on information received from the states in which the Company writes business and may change due to many factors including the Company's share of the ultimate cost of current insolvencies.
- 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. Various lawsuits against the Company can arise in the course of the Company's business. Contingent liabilities which can arise from litigation, income taxes and other matters are not considered material in relation to the financial position of the Company.

### 15. Leases

- A. (1) Total rent expense for the Company for the years ended December 31, 2009 and 2008 was \$7,735,241 and \$7,712,767, respectively.
- (2) The Company leases office space and equipment under leases that expire at various dates through 2015. The Company accounts for the majority of these leases as operating leases. Certain leases include renewal options.

Minimum aggregate rental commitments to non-affiliated lessors are as follows:

2010	\$ 1,223,690
2011	722,406
2012	513,602
2013	299,981
2014	164,940
Thereafter	<u>51,574</u>
<b>Total</b>	<b><u>\$ 2,976,193</u></b>

- (3) The Company is not involved in any material sale-leaseback transactions.

B. Lessor Leases

The Company sub-leases premises that it leases. It was an insignificant part of the business activities. The Company has no leveraged lease transactions.



## NOTES TO FINANCIAL STATEMENTS

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

- (1) Financial Instruments with Off-Balance Sheet Risk  
The Company's financial instruments with off-balance sheet risk are limited to options with the asset face amount of \$2,370,000 and \$1,424,000 as of December 31, 2009 and 2008, respectively. See Schedule DB of the Company's annual statement for additional detail.
- (2) The Company uses options to mitigate the exposure from changes in the S&P 500 index related to the equity-indexed annuity product. The cost of the contracts is the cash exchanged at the onset of the contract. Options are recorded at fair value with the unrealized gain or loss recorded in surplus. Realized gains or losses incurred upon termination of the contract are recorded in realized investment gains and losses.
- (3) The Company is exposed to credit-related losses in the event of nonperformance by counterparties to financial instruments, but it does not expect any counterparties to fail to meet their obligations given their high credit ratings. The credit exposures of S&P 500 options is represented by the fair value of contracts with a positive fair value at the reporting date.
- (4) The current credit exposure of the Company's derivative contracts is limited to the fair value at the reporting date. Credit risk is managed by entering into transactions with creditworthy counterparties and obtaining collateral where appropriate and customary. The Company also attempts to minimize its exposure to credit risk through the use of various credit monitoring techniques. Approximately 100% of the net credit exposure for the Company from derivative contracts is with investment-grade counterparties.

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

- A. The Company has no transfers of receivables recorded as sales.
- B. Transfer and Servicing of Financial Assets
  - (1) Transfer of Financial Assets - Not applicable.
  - (2) The Company had securities lending agreements with JPMorgan Chase Bank which were suspended in December 2009. The loaned securities remained in exclusive control of the Company. The collateral provided by the transferee was in the form of invested assets and represented a minimum of 102 percent of the fair value of the loaned securities. If at any time the fair value of the collateral was less than 100 percent of the fair value of the loaned securities, the transferee was obligated to deliver additional collateral, the fair value of which, together with the fair value of all the collateral equaled at least 102 percent of the fair value of the loaned securities. The collateral assets were restricted and were not available for general use by the Company. The fair value of the collateral deposited by the borrower was \$0 and \$88,115,675 as of December 31, 2009 and December 31 2008, respectively.  
  
The Separate Account participated in the general account securities lending program which was suspended in December 2009. The fair value of the collateral deposited by the borrower within the separate account was \$0 and \$17,598,540 as of December 31, 2009 and 2008, respectively.
  - (3) Servicing assets and servicing liabilities - Not applicable.
  - (4) Securitized Financial Assets - Not applicable.
  - (5) Retained interest in securitized financial assets - Not applicable.
  - (6) Transfers of receivables with recourse - Not applicable.
- C. 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, 2009.

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

Gain or loss from uninsured accident and health plans and the uninsured portion of partially insured plans is not applicable to the Company at this time.

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

The Company does not use Managing General Agents. Direct premiums written through Third Party Administrators totaled \$35,797,810 and \$36,771,883 as of December 31, 2009 and 2008, respectively.

## NOTES TO FINANCIAL STATEMENTS

### 20. Other Items

- A. Extraordinary – Not applicable.
- B. Troubled Debt Restructuring – Not applicable.
- C. Other Disclosures  
Assets in the amount of \$5,640,026 and \$5,564,475 were on deposit with government authorities or trustees as required by law as of December 31, 2009 and 2008, 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

(1) <u>Description of Transferable Tax Credits</u>	<u>State</u>	<u>Carrying Value</u>	<u>Unused Amount</u>
Business Energy Income Tax Credits	Oregon	\$ 189,528	\$ 189,528
Historic Homes Rehabilitation Tax Credit	Connecticut	14,789	14,789
Historic Homes Rehabilitation Tax Credit	Massachusetts	270,000	270,000
Film Premium Tax Credit	Massachusetts	42,088	42,088
Film Premium Tax Credit	Iowa	<u>90,000</u>	<u>90,000</u>
<b>Total Transferable Tax Credits</b>		<b>\$ 606,405</b>	<b>\$ 606,405</b>

(2) Method of Estimating Utilization of Remaining Credits

The Company estimated the utilization of the remaining Transferable State Tax Credits by projecting future state tax liability based on projected premiums, net income, apportionment percentages, and tax rates, and comparing projected future tax liability to the availability of remaining Transferable State Tax Credits.

(3) Impairment Loss

The Company recognizes no impairment loss based on an analysis of the carrying amount for State Transferable Tax Credits.

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 one security with a subprime exposure. This security is B rated with an unrealized loss of \$856 due exclusively to asset value changes.
- (2) Direct exposure through investments in subprime mortgage loans - None.
- (3) Direct exposure through other investments.

<u>Type of Investment</u>	<u>Actual Cost</u>	<u>Book Adjusted Carrying Value</u>	<u>Fair Value</u>	<u>Impairment Losses</u>
Residential mortgage-backed securities	\$73,999	\$74,047	\$73,191	None

- (4) Underwriting exposure to subprime mortgage risk through Mortgage Guaranty or Financial Guaranty insurance coverage – Not applicable.

### 21. 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. Subsequent events have been considered through February 26, 2010 for the statutory statement issued on February 26, 2010.

Type II: Nonrecognized Subsequent Events:

On January 27, 2010, the Company's parent, Symetra Financial Corporation, completed an initial public offering of 34,960,000 shares of its common stock, of which 25,259,510 were new shares issued. Symetra Financial Corporation received net proceeds of \$282,485,058.

On January 29, 2010, the Company received a cash contribution of \$210,700,000 of the net proceeds from its parent.

The Company has not experienced any other 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 26, 2010 for the statutory statement issued on February 26, 2010.

## NOTES TO FINANCIAL STATEMENTS

### 22. Reinsurance

#### A. Ceded Reinsurance Report

##### Section 1 – General Interrogatories

- (1) Are any of the reinsurers, listed in Schedule S as non-affiliated, owned in excess of 10% or controlled, either directly or indirectly, by the Company or by any representative, officer, trustee, or director of the Company?  
Yes ( ) No (X)
- (2) Have any policies issued by the Company been reinsured with a company chartered in a country other than the United States (excluding U.S. Branches of such companies) which is owned in excess of 10 % or controlled directly or indirectly by an insured, a beneficiary, a creditor or an insured or any other person not primarily engaged in the insurance business?  
Yes ( ) No (X)

##### Section 2 – Ceded Reinsurance Report – Part A

- (1) Does the Company have any reinsurance agreements in effect under which the reinsurer may unilaterally cancel any reinsurance for reasons other than for nonpayment of premium or other similar credits?  
Yes ( ) No (X)
- (2) Does the reporting entity have any reinsurance agreements in effect such that the amount of losses paid or accrued through the statement date may result in a payment to the reinsurer of amounts that, in aggregate and allowing for offset of mutual credits from other reinsurance agreements with the same reinsurer, exceed the total direct premium collected under the reinsured policies?  
Yes ( ) No (X)

##### Section 3 – Ceded Reinsurance Report – Part B

- (1) What is the estimated amount of the aggregate reduction in surplus, (for agreements other than those under which the reinsurer may unilaterally cancel for reasons other than for nonpayment of premium or other similar credits that are reflected in Section 2 above) of termination of all reinsurance agreements, by either party, as of the date of this statement? Where necessary, the company may consider the current or anticipated experience of the business reinsured in making this estimate. \$0
- (2) Have any new agreements been executed or existing agreements amended, since January 1 of the year of this statement, to include policies or contracts that were in force or which had existing reserves established by the company as of the effective date of the agreement?  
Yes ( ) No (X)

#### B. Uncollectible Reinsurance

The Company had no uncollectible reinsurance as of December 31, 2009 or 2008.

#### C. Commutation of Reinsurance Reflected in Income and Expenses

The Company had no commutation of ceded reinsurance as of December 31, 2009 or 2008.

### 23. Retrospectively Rated Contracts & Contracts Subject to Redetermination

- A. The Company estimates accrued retrospective premium adjustments for two group health insurance policies per the terms of each contract. The contract for one policy calls for an additional premium to be paid if claims experience exceeds 64% of the sum of the net premiums during the policy period. The contract for the second policy refunds to the policyholder 50% of the difference between the targeted and actual claims experience when the loss ratio falls below 75%.
- B. The Company records accrued retrospective premium as an adjustment to earned premium.
- C. The amount of net premiums written by the Company for the year ended December 31, 2009 that are subject to retrospective rating features was \$2,909,686 which represented 0.69% of the total net premiums written on the Company's group health business. No other net premiums written by the Company are subject to retrospective rating.

### 24. Change in Incurred Losses and Loss Adjustment Expenses

Reserves as of December 31, 2008 were \$115,218,749. As of December 31, 2009, \$76,681,326 has been paid for incurred claims and claim adjustment expenses attributable to insured events of prior years. Reserves remaining for prior years are now \$6,589,279 for unpaid claims and claim adjustment expenses primarily on group accident and health claims and guaranteed renewable individual disability claims. Therefore, there has been \$31,948,144 favorable prior-year development since December 31, 2008. The decrease is generally the result of ongoing analysis of recent loss development trends. Original estimates are continually monitored and are updated as additional information about the expected versus actual timing of claims becomes known.

### 25. Intercompany Pooling Arrangements

Not applicable

## NOTES TO FINANCIAL STATEMENTS

### 26. Structured Settlements

Not applicable

### 27. Health Care Receivable

Not applicable

### 28. Participating Policies

For the reporting year ended December 31, 2009, premiums under ordinary life participating policies were \$3,279, or 0.003% of total ordinary life premiums earned. The Company accounts for its policyholder dividends based upon the accrual method. The Company paid dividends in the amount of \$5,148 to policyholders and did not allocate any additional income to such policyholders.

### 29. Premium Deficiency Reserves

The Company does not have accident and health premium deficiency reserves as of December 31, 2009 or 2008.

### 30. Reserves for Life Contracts and Annuity Contracts

- (1) The Company waives deduction of deferred fractional premium upon death of insured and returns any portion of the final premium beyond the date of death. Surrender values are not promised in excess of legally computed reserves.
- (2) Policies for the majority of substandard lives are charged an extra premium plus the gross premium for a rated age. Mean reserves are determined by computing the regular mean reserve for the plan at any rated age and holding in addition one-half (1/2) of any extra premium charge for the year. The Company has issued a limited number of policies at standard rates and may include impairments through Table 4. Mean reserves for these limited number of policies is the regular mean reserve for the plan.
- (3) As of December 31, 2009 and 2008, the Company had \$2,295,145,274 and \$2,726,808,207, respectively, of insurance in force for which the gross premiums are less than the net premiums according to the standard valuation set by the state of Washington. Reserves to cover the above insurance as reported in Exhibit 5, Miscellaneous Reserves Section, were \$30,225,574 and \$36,578,353 at December 31, 2009 and 2008, respectively.
- (4) The Tabular Interest has been determined by formula as described in the instructions for Page 7.
- (5) In the determination of Tabular Interest on funds not involving life contingencies for each valuation rate of interest, the Tabular Interest is calculated as the change in reserves minus premiums plus benefits. Interest is verified by comparison to the general ledger.
- (6) The Company had no significant other reserve changes.

### 31. Analysis of Annuity Actuarial Reserves and Deposit Liabilities by Withdrawal Characteristics

Withdrawal Characteristics of Annuity Actuarial Reserves and Deposit-Type Contract Funds and other Liabilities Without Life or Disability Contingencies as of December 31, 2009:

	Amount	Percent of Total
A. Subject to discretionary withdrawal:		
(1) With fair value adjustment	\$ 365,562,583	2.6%
(2) At book value less surrender charge of 5 percent or more	4,197,852,087	30.5%
(3) At fair value	<u>750,765,592</u>	<u>5.4%</u>
(4) Total with adjustment or at market value	5,314,180,262	38.5%
(5) At book value without adjustment (minimal or no charge or adjustment)	2,387,297,131	17.3%
B. Not subject to discretionary withdrawal	<u>6,099,747,332</u>	<u>44.2%</u>
C. Total (gross)	13,801,224,725	<u>100.0%</u>
D. Reinsurance ceded	<u>5,102,026</u>	
E. Total (net)* (C) - (D)	<u>\$ 13,796,122,699</u>	
* Reconciliation of total annuity actuarial reserves and deposit fund liabilities		
F. Life & Accident & Health Annual Statement:		
(1) Exhibit 5, Annuities Section, Total (net)	\$ 10,736,369,332	
(2) Exhibit 5, Supplementary Contracts with Life Contingencies Section, Total (net)	103,552	
(3) Exhibit 7 Deposit-Type Contracts, Line 14, Column 1	<u>2,308,884,223</u>	
(4) Subtotal	13,045,357,107	
Separate Accounts Annual Statement:		
(5) Exhibit 3, Line 0299999, Column 2	744,363,488	
(10) Other contract deposit funds	<u>6,402,104</u>	
(11) Subtotal	750,765,592	
(12) Combined Total	<u>\$ 13,796,122,699</u>	

G. FHLB (Federal Home Loan Bank) Agreements – Not applicable.

**NOTES TO FINANCIAL STATEMENTS**

Withdrawal Characteristics of Annuity Actuarial Reserves and Deposit - Type Contract Funds and other Liabilities Without Life or Disability Contingencies as of December 31, 2008:

	<u>Amount</u>	<u>Percent of Total</u>
A. Subject to discretionary withdrawal:		
(1) With fair value adjustment	\$ 380,456,965	3.2%
(2) At book value less surrender charge of 5 percent or more	2,508,477,298	20.9%
(3) At fair value	<u>641,090,157</u>	<u>5.3%</u>
(4) Total with adjustment or at market value	3,530,024,420	29.4%
(5) At book value without adjustment (minimal or no charge or adjustment)	2,388,775,042	19.9%
B. Not subject to discretionary withdrawal	<u>6,095,873,085</u>	<u>50.7%</u>
C. Total (gross)	12,014,672,547	<u>100.0%</u>
D. Reinsurance ceded	<u>5,515,066</u>	
E. Total (net)* (C) - (D)	<u>\$ 12,009,157,481</u>	
* Reconciliation of total annuity actuarial reserves and deposit fund liabilities		
F. Life & Accident & Health Annual Statement:	\$ 8,948,683,149	
(2) Exhibit 5, Supplementary Contracts with Life Contingencies Section, Total (net)	107,071	
(3) Exhibit 7 Deposit-Type Contracts, Line 14, Column 1	<u>2,419,277,104</u>	
(4) Subtotal	11,368,067,324	
Separate Accounts Annual Statement:		
(5) Exhibit 3, Line 0299999, Column 2	634,850,154	
(10) Other contract deposit funds	<u>6,240,003</u>	
(11) Subtotal	641,090,157	
(12) Combined Total	<u>\$ 12,009,157,481</u>	
G. FHLB (Federal Home Loan Bank) Agreements – Not applicable.		

**32. Premium and Annuity Considerations Deferred and Uncollected**

The deferred and uncollected life insurance premiums and annuity considerations as of December 31, 2009 were as follows:

<u>Type</u>	<u>Gross</u>	<u>Net of Loading</u>
Ordinary – New Business	\$ 2,544,736	\$ 649,670
Ordinary – Renewal	19,984,503	46,371,344
Group Life	<u>(531,080)</u>	<u>(531,080)</u>
Total	<u>\$ 21,998,159</u>	<u>\$ 46,489,934</u>

The deferred and uncollected life insurance premiums and annuity considerations as of December 31, 2008 were as follows:

<u>Type</u>	<u>Gross</u>	<u>Net of Loading</u>
Ordinary – New Business	\$ 927,094	\$ 162,237
Ordinary – Renewal	22,307,862	49,600,975
Group Life	<u>(531,318)</u>	<u>(531,318)</u>
Total	<u>\$ 22,703,638</u>	<u>\$ 49,231,894</u>

**NOTES TO FINANCIAL STATEMENTS****33. Separate Accounts**

- A. Funds received from sales of individual variable annuities, group variable annuities, variable universal life, and variable life products are held in separate variable accounts. The assets of these accounts are held at market value. Funds received from bank-owned life insurance are held in separate fixed accounts. The assets of these accounts are held at amortized cost.

Information regarding the separate accounts of the Company for December 31, 2009 is as follows:

	<u>Nonindexed guarantee more than 4%</u>	<u>Nonguaranteed Separate Account</u>	<u>Total</u>
1. Premiums, considerations or deposits for the year ended December 31, 2009	\$ 25,043,012	\$ 94,687,762	\$ 119,730,774
2. Reserves at December 31, 2009			
For accounts with assets at:			
a. Fair value	\$ 0	\$ 833,303,063	\$ 833,303,063
b. Amortized cost	<u>3,192,144,811</u>	<u>0</u>	<u>3,192,144,811</u>
c. Total reserves*	<u>\$ 3,192,144,811</u>	<u>\$ 833,303,063</u>	<u>\$ 4,025,447,874</u>
3. By withdrawal characteristics:			
d. At fair value	\$ 0	\$ 833,303,063	\$ 833,303,063
e. At book value without MV adjustment and with current surrender charges less than 5%	<u>3,192,144,811</u>	<u>0</u>	<u>3,192,144,811</u>
<b>f. Total</b>	<b><u>\$ 3,192,144,811</u></b>	<b><u>\$ 833,303,063</u></b>	<b><u>\$ 4,025,447,874</u></b>

**B. Reconciliation of Net Transfers To or (From) Separate Accounts**

1. Transfers as reported in the Summary of Operation of the Separate Accounts Statement:

a. Transfers to Separate Accounts (Page 4, Line 1.4)	257,168,185
b. Transfers from Separate Accounts (Page 4, Line 10)	<u>(238,623,063)</u>
c. Net Transfers to (from) Separate Accounts (a) – (b)	\$ 18,545,122

2. Transfers as reported in the Summary of Operation of the Life Accident and Health Annual Statement (page 4, Line 26)

\$ 18,545,122

Information regarding the separate accounts of the Company for December 31, 2008 is as follows:

	<u>Nonindexed guarantee more than 4%</u>	<u>Nonguaranteed Separate Account</u>	<u>Total</u>
1. Premiums, considerations or deposits for the year ended December 31, 2008	\$ 28,875,508	\$ 128,614,688	\$ 157,490,196
2. Reserves at December 31, 2008			
For accounts with assets at:			
a. Fair value	\$ 0	\$ 709,174,770	\$ 709,174,770
b. Amortized cost	<u>2,994,583,958</u>	<u>0</u>	<u>2,994,583,958</u>
c. Total reserves*	<u>\$ 2,994,583,958</u>	<u>\$ 709,174,770</u>	<u>\$ 3,703,758,728</u>
3. By withdrawal characteristics:			
d. At fair value	\$ 0	\$ 709,174,770	\$ 709,174,770
e. At book value without MV adjustment and with current surrender charges less than 5%	<u>2,994,583,958</u>	<u>0</u>	<u>2,994,583,958</u>
<b>f. Total</b>	<b><u>\$ 2,994,583,958</u></b>	<b><u>\$ 709,174,770</u></b>	<b><u>\$ 3,703,758,728</u></b>

**B. Reconciliation of Net Transfers To or (From) Separate Accounts**

1. Transfers as reported in the Summary of Operation of the Separate Accounts Statement:

a. Transfers to Separate Accounts (Page 4, Line 1.4)	296,525,116
b. Transfers from Separate Accounts (Page 4, Line 10)	<u>(286,012,172)</u>
c. Net Transfers to (from) Separate Accounts (a) – (b)	\$ 10,512,944

2. Transfers as reported in the Summary of Operation of the Life Accident and Health Annual Statement (page 4, Line 26)

\$ 10,512,944

**34. Loss/Claim Adjustment Expenses**

The balance in the liability for unpaid accident and health claim adjustment expenses was \$982,000 and \$1,228,000 as of December 31, 2009, and 2008, respectively. The Company evaluated that it had incurred \$2,637,837 and paid \$2,883,837 of claim adjustment expense in the current year, of which \$724,460 of the paid amount was attributable to insured or covered events of prior years. The Company did not take into account estimated anticipated salvage and subrogation in its determination of the liability for unpaid claims/losses.

# GENERAL INTERROGATORIES

## PART 1 - COMMON INTERROGATORIES GENERAL

- 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? ..... Yes [ X ] No [ ]
- 1.2 If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent, or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations? ..... Yes [ X ] No [ ] N/A [ ]
- 1.3 State Regulating? ..... Washington
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? ..... 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. .... 12/31/2005
- 3.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and 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 available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). .... 02/29/2008
- 3.4 By what department or departments?  
Washington
- 3.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments? ..... Yes [ ] No [ ] N/A [ X ]
- 3.6 Have all of the recommendations within the latest financial examination report been complied with? ..... Yes [ X ] No [ ] N/A [ ]
- 4.1 During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity), receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:  
4.11 sales of new business? ..... Yes [ ] No [ X ]  
4.12 renewals? ..... Yes [ ] No [ X ]
- 4.2 During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:  
4.21 sales of new business? ..... Yes [ ] No [ X ]  
4.22 renewals? ..... Yes [ ] No [ X ]
- 5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? ..... Yes [ ] No [ X ]
- 5.2 If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.
- | 1<br>Name of Entity | 2<br>NAIC Company Code | 3<br>State of Domicile |
|---------------------|------------------------|------------------------|
|                     |                        |                        |
- 6.1 Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? ..... Yes [ ] No [ X ]
- 6.2 If yes, give full information:
- 7.1 Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity? ..... Yes [ X ] No [ ]
- 7.2 If yes,  
7.21 State the percentage of foreign control; ..... 18.8 %  
7.22 State the nationality(s) of the foreign person(s) or entity(s) or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact; and identify the type of entity(s) (e.g., individual, corporation or government, manager or attorney in fact).

1 Nationality	2 Type of Entity
Bermuda .....	Corporation .....

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

**GENERAL INTERROGATORIES**

- 8.1 Is the company a subsidiary of a bank holding company regulated by the Federal Reserve Board? ..... Yes [ ] No [ X ]
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.
- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? ..... Yes [ X ] No [ ]
- 8.4 If response to 8.3 is yes, please provide the names and locations (city and state of the main office) of any affiliates regulated by a federal financial regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Office of Thrift Supervision (OTS), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC) and identify the affiliate's primary federal regulator.

1 Affiliate Name	2 Location (City, State)	3 FRB	4 OCC	5 OTS	6 FDIC	7 SEC
Symetra Investment Services, Inc .....	Bellevue, WA .....	NO	NO	NO	NO	YES
Symetra Securities, Inc. ....	Bellevue, WA .....	NO	NO	NO	NO	YES

9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?  
Ernst & Young LLP  
Suite 3500  
999 Third Avenue  
Seattle, WA 98104
10. What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?  
Dena Simone Thompson, FSA, MAAA  
Senior Actuary and Assistant Vice President  
Symetra Life Insurance Company  
777 108th Avenue NE, Suite 1200  
MS: SC-14  
Bellevue, WA 98004
- 11.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? ..... Yes [ ] No [ X ]
- 11.11 Name of real estate holding company .....
- 11.12 Number of parcels involved .....
- 11.13 Total book/adjusted carrying value ..... \$ .....

11.2 If, yes provide explanation:  
.....

**12. FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:**

- 12.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?
- 12.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? ..... Yes [ ] No [ ]
- 12.3 Have there been any changes made to any of the trust indentures during the year? ..... Yes [ ] No [ ]
- 12.4 If answer to (12.3) is yes, has the domiciliary or entry state approved the changes? ..... Yes [ ] No [ ] N/A [ ]
- 13.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? ..... Yes [ X ] No [ ]
- (a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
- (c) Compliance with applicable governmental laws, rules and regulations;
- (d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
- (e) Accountability for adherence to the code.
- 13.11 If the response to 13.1 is No, please explain:  
.....
- 13.2 Has the code of ethics for senior managers been amended? ..... Yes [ ] No [ X ]
- 13.21 If the response to 13.2 is Yes, provide information related to amendment(s).  
.....
- 13.3 Have any provisions of the code of ethics been waived for any of the specified officers? ..... Yes [ ] No [ X ]
- 13.31 If the response to 13.3 is Yes, provide the nature of any waiver(s).  
.....

**BOARD OF DIRECTORS**

14. 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? ..... Yes [ X ] No [ ]
15. Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof? ..... Yes [ X ] No [ ]
16. Has the reporting entity an established procedure for disclosure to its board of directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict with the official duties of such person? ..... Yes [ X ] No [ ]



## GENERAL INTERROGATORIES

### FINANCIAL

17. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? ..... Yes [ ] No [ X ]
- 18.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):
- 18.11 To directors or other officers.....\$ .....
  - 18.12 To stockholders not officers.....\$ .....
  - 18.13 Trustees, supreme or grand (Fraternal Only).....\$ .....
- 18.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):
- 18.21 To directors or other officers.....\$ .....
  - 18.22 To stockholders not officers.....\$ .....
  - 18.23 Trustees, supreme or grand (Fraternal Only).....\$ .....
- 19.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reported in the statement? ..... Yes [ ] No [ X ]
- 19.2 If yes, state the amount thereof at December 31 of the current year:
- 19.21 Rented from others.....\$ .....
  - 19.22 Borrowed from others.....\$ .....
  - 19.23 Leased from others.....\$ .....
  - 19.24 Other.....\$ .....
- 20.1 Does this statement include payments for assessments as described in the Annual Statement Instructions other than guaranty fund or guaranty association assessments? ..... Yes [ X ] No [ ]
- 20.2 If answer is yes,
- 20.21 Amount paid as losses or risk adjustment \$ ..... 0
  - 20.22 Amount paid as expenses.....\$ ..... 3,685,798
  - 20.23 Other amounts paid.....\$ ..... 0
- 21.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? ..... Yes [ X ] No [ ]
- 21.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: .....\$ ..... 0

### INVESTMENT

- 22.1 Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)..... Yes [ X ] No [ ]
- 22.2 If no, give full and complete information relating thereto:
- 22.3 For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided) Reference notes
- 22.4 Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions? ..... Yes [ ] No [ ] N/A [ X ]
- 22.5 If answer to 22.4 is YES, report amount of collateral. ....\$ .....
- 22.6 If answer to 22.4 is NO, report amount of collateral. ....\$ .....
- 23.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3). ..... Yes [ X ] No [ ]
- 23.2 If yes, state the amount thereof at December 31 of the current year:
- 23.21 Subject to repurchase agreements.....\$ ..... 0
  - 23.22 Subject to reverse repurchase agreements.....\$ ..... 0
  - 23.23 Subject to dollar repurchase agreements.....\$ ..... 0
  - 23.24 Subject to reverse dollar repurchase agreements.....\$ ..... 0
  - 23.25 Pledged as collateral.....\$ ..... 0
  - 23.26 Placed under option agreements.....\$ ..... 0
  - 23.27 Letter stock or other securities restricted as to sale.....\$ ..... 0
  - 23.28 On deposit with state or other regulatory body.....\$ ..... 5,640,026
  - 23.29 Other.....\$ ..... 0

23.3 For category (23.27) provide the following:

1 Nature of Restriction	2 Description	3 Amount

- 24.1 Does the reporting entity have any hedging transactions reported on Schedule DB? ..... Yes [ ] No [ X ]
- 24.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? ..... Yes [ ] No [ ] N/A [ X ]  
If no, attach a description with this statement.
- 25.1 Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into equity, or, at the option of the issuer, convertible into equity? ..... Yes [ ] No [ X ]
- 25.2 If yes, state the amount thereof at December 31 of the current year. ....\$ .....

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

**GENERAL INTERROGATORIES**

26. Excluding items in Schedule E - Part 3 - Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 3, III Conducting Examinations, F - Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook? Yes  No

26.01 For agreements that comply with the requirements of the NAIC Financial Condition Examiners Handbook, complete the following:

1 Name of Custodian(s)	2 Custodian's Address
JP Morgan Chase	1 Chase Manhattan Bank, Floor 19 Mail Code NY 1-A331 New York, NY 10005-1401

26.02 For all agreements that do not comply with the requirements of the NAIC Financial Condition Examiners Handbook, provide the name, location and a complete explanation:

1 Name(s)	2 Location(s)	3 Complete Explanation(s)

26.03 Have there been any changes, including name changes, in the custodian(s) identified in 26.01 during the current year? Yes  No

26.04 If yes, give full and complete information relating thereto:

1 Old Custodian	2 New Custodian	3 Date of Change	4 Reason

26.05 Identify all investment advisors, brokers/dealers or individuals acting on behalf of brokers/dealers that have access to the investment accounts, handle securities and have authority to make investments on behalf of the reporting entity:

1 Central Registration Depository Number(s)	2 Name	3 Address
104123	White Mountains Advisors, LLC	200 Hubbard Road Guilford, CT 06437

27.1 Does the reporting entity have any diversified mutual funds reported in Schedule D, Part 2 (diversified according to the Securities and Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5(b)(1)])? Yes  No

27.2 If yes, complete the following schedule:

1 CUSIP #	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
724010-10-3	Pioneer Value Fund A	23,638
723682-10-0	Pioneer Fund A	270,864
723750-10-8	Pioneer Mid Cap Value Fund A	28,893
72387W-40-8	Pioneer Growth Opportunities A	285,442
72387P-72-6	Pioneer Govt Income Fund A	2,133
723755-10-4	Pioneer Cash Reserve Fund A	2,747
27.2999 - Total		613,717

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

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holding	4 Date of Valuation
Pioneer Value Fund A	Chevron Corp	1,181	12/31/2009
Pioneer Fund A	Chevron Corp	7,942	12/31/2009
Pioneer Mid Cap Value Fund A	Ball Corp	831	12/31/2009
Pioneer Growth Opportunities A	Exterran Holdings Inc.	5,909	12/31/2009
Pioneer Govt Income Fund A	TII 13 / 8	141	12/31/2009
Pioneer Cash Reserve Fund A	Blackrock Liquidity Fund	123	12/31/2009

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**GENERAL INTERROGATORIES**

28. 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 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
28.1 Bonds .....	14,575,031,652	14,905,745,518	330,713,866
28.2 Preferred stocks .....	63,178,945	50,220,747	(12,958,198)
28.3 Totals	14,638,210,597	14,955,966,265	317,755,668

28.4 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 which reflects the price 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.

29.1 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 ]

29.2 If yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic copy) for all brokers or custodians used as a pricing source? ..... Yes [ ] No [ ]

29.3 If 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.

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

30.2 If no, list exceptions:

**OTHER**

31.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any? .....\$ .....415,792

31.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
Fitch Ratings .....	125,000
Standard and Poors .....	130,600

32.1 Amount of payments for legal expenses, if any? .....\$ .....1,073,823

32.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid

33.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? .....\$ .....52,752

33.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
American Council of Life Insurers .....	32,067

# GENERAL INTERROGATORIES

## PART 2 - LIFE INTERROGATORIES

1.1 Does the reporting entity have any direct Medicare Supplement Insurance in force? ..... Yes [ ] 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 Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above. .... \$

1.5 Indicate total incurred claims on all Medicare Supplement Insurance. .... \$

1.6 Individual policies:

Most current three years:

1.61 Total premium earned ..... \$

1.62 Total incurred claims ..... \$

1.63 Number of covered lives .....

All years prior to most current three years

1.64 Total premium earned ..... \$

1.65 Total incurred claims ..... \$

1.66 Number of covered lives .....

1.7 Group policies:

Most current three years:

1.71 Total premium earned ..... \$

1.72 Total incurred claims ..... \$

1.73 Number of covered lives .....

All years prior to most current three years

1.74 Total premium earned ..... \$

1.75 Total incurred claims ..... \$

1.76 Number of covered lives .....

2. Health Test:

	1 Current Year	2 Prior Year
2.1 Premium Numerator .....	382,671,934	399,579,157
2.2 Premium Denominator .....	2,827,927,555	2,275,145,032
2.3 Premium Ratio (2.1/2.2) .....	0.135	0.176
2.4 Reserve Numerator .....	100,095,064	114,369,012
2.5 Reserve Denominator .....	12,342,591,993	10,667,625,091
2.6 Reserve Ratio (2.4/2.5) .....	0.008	0.011

3.1 Does this reporting entity have Separate Accounts? ..... Yes [ X ] No [ ]

3.2 If yes, has a Separate Accounts Statement been filed with this Department? ..... Yes [ X ] No [ ] N/A [ ]

3.3 What portion of capital and surplus funds of the reporting entity covered by assets in the Separate Accounts statement, is not currently distributable from the Separate Accounts to the general account for use by the general account? ..... \$ 0

3.4 State the authority under which Separate Accounts are maintained:  
Section 48,18A.020 of the Revised Code of Washington .....

3.5 Was any of the reporting entity's Separate Accounts business reinsured as of December 31? ..... Yes [ X ] No [ ]

3.6 Has the reporting entity assumed by reinsurance any Separate Accounts business as of December 31? ..... Yes [ ] No [ X ]

3.7 If the reporting entity has assumed Separate Accounts business, how much, if any, reinsurance assumed receivable for reinsurance of Separate Accounts reserve expense allowances is included as a negative amount in the liability for "Transfers to Separate Accounts due or accrued (net)?" .....

4.1 Are personnel or facilities of this reporting entity used by another entity or entities or are personnel or facilities of another entity or entities used by this reporting entity (except for activities such as administration of jointly underwritten group contracts and joint mortality or morbidity studies)? ..... Yes [ X ] No [ ]

4.2 Net reimbursement of such expenses between reporting entities:

4.21 Paid ..... \$ 0

4.22 Received ..... \$ 2,663,273

5.1 Does the reporting entity write any guaranteed interest contracts? ..... Yes [ X ] No [ ]

5.2 If yes, what amount pertaining to these lines is included in:

5.21 Page 3, Line 1 ..... \$ 0

5.22 Page 4, Line 1 ..... \$ 0

6. FOR STOCK REPORTING ENTITIES ONLY:

6.1 Total amount paid in by stockholders as surplus funds since organization of the reporting entity: ..... \$ 422,175,394

7. Total dividends paid stockholders since organization of the reporting entity:

7.11 Cash ..... \$ 840,900,000

7.12 Stock ..... \$ 0

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

**GENERAL INTERROGATORIES**

8.1 Does the company reinsure any Workers' Compensation Carve-Out business defined as: ..... Yes [ ] No [ X ]  
 Reinsurance (including retrocessional reinsurance) assumed by life and health insurers of medical, wage loss and death benefits of the occupational illness and accident exposures, but not the employers liability exposures, of business originally written as workers' compensation insurance.

8.2 If yes, has the reporting entity completed the Workers' Compensation Carve-Out Supplement to the Annual Statement? ..... Yes [ ] No [ ]

8.3 If 8.1 is yes, the amounts of earned premiums and claims incurred in this statement are:

	1 Reinsurance Assumed	2 Reinsurance Ceded	3 Net Retained
8.31 Earned premium .....			
8.32 Paid claims .....			
8.33 Claim liability and reserve (beginning of year) .....			
8.34 Claim liability and reserve (end of year) .....			
8.35 Incurred claims .....			

8.4 If reinsurance assumed included amounts with attachment points below \$1,000,000, the distribution of the amounts reported in Lines 8.31 and 8.34 for Column (1) are:

	Attachment Point	1 Earned Premium	2 Claim Liability and Reserve
8.41	<\$25,000		
8.42	\$25,000 - 99,999		
8.43	\$100,000 - 249,999		
8.44	\$250,000 - 999,999		
8.45	\$1,000,000 or more		

8.5 What portion of earned premium reported in 8.31, Column 1 was assumed from pools? ..... \$ .....

9.1 Does the company have variable annuities with guaranteed benefits? ..... Yes [ X ] No [ ]

9.2 If 9.1 is yes, complete the following table for each type of guaranteed benefit.

Type		3 Waiting Period Remaining	4 Account Value Related to Col. 3	5 Total Related Account Values	6 Gross Amount of Reserve	7 Location of Reserve	8 Portion Reinsured	9 Reinsurance Reserve Credit
1 Guaranteed Death Benefit	2 Guaranteed Living Benefit							
Return of Premium .....	None .....	None .....	None .....	398,644,670	0	Exhibit 5 .....	None .....	0
5, 6, & 8 Yr Ratchet .....	None .....	None .....	None .....	765,255,098	0	Exhibit 5 .....	None .....	

10. For reporting entities having sold annuities to another insurer where the insurer purchasing the annuities has obtained a release of liability from the claimant (payee) as the result of the purchase of an annuity from the reporting entity only:

10.1 Amount of loss reserves established by these annuities during the current year? ..... \$ 17,604,182

10.2 List the name and location of the insurance company purchasing the annuities and the statement value on the purchase date of the annuities.

1	2 Statement Value on Purchase Date of Annuities (i.e., Present Value)
P&C Insurance Company And Location	
Injured Workers Insurance Fund, Towson, MD .....	2,217,330
XL Specialty Insurance Company, New York, NY .....	1,500,000
Westfield Insurance Company, Westfield Center, OH .....	820,967
Utica National Insurance Group, Richmond, VA .....	810,000
Pronational Insurance Company, Birmingham, AL .....	763,599
One Beacon Insurance, Canton, MA .....	736,547
FCCL Insurance Company, Sarasota, FL .....	646,706
MHA Insurance Co, Lansing, MI .....	500,000
Federated Rural Electric Insurance Exchange, Lenexa, KY .....	482,600
Auto Owners Insurance, St Louis, MO .....	450,000
Nationwide Insurance, Columbus, OH .....	445,000
Redland Ins Co, New York, NY .....	439,739
Firemans Fund Insurance Company, Chicago, IL .....	417,279
One Beacon Insurance Co, Woodbury, NY .....	380,000
Arch Specialty Insurance Company, Jersey City, NJ .....	361,665
California Joint Powers Ins Authority, Upland, CA .....	339,536
Motorists Mutual Insurance Company, Columbus, OH .....	325,000
IWIF Workers Comp Insurance, Columbia, MD .....	320,445
Firemans Fund Ins Co, Denver, CO .....	300,000
Navigators Insurance Company, Rye Brook, NY .....	300,000
Frankenmuth Mutual Insurance Company, Frankenmuth, MI .....	295,112
State Farm General Ins, West Lake Village, CA .....	280,000

11.1 Do you act as a custodian for health savings accounts? ..... Yes [ ] No [ X ]

11.2 If yes, please provide the amount of custodial funds held as of the reporting date. .... \$ .....

11.3 Do you act as an administrator for health savings accounts? ..... Yes [ ] No [ X ]

11.4 If yes, please provide the balance of funds administered as of the reporting date. .... \$ .....

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

**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)

	1 2009	2 2008	3 2007	4 2006	5 2005
<b>Life Insurance in Force</b> (Exhibit of Life Insurance)					
1. Ordinary - whole life and endowment (Line 34, Col. 4) .....	19,020,471	19,733,924	19,963,985	20,117,909	20,912,775
2. Ordinary - term (Line 21, Col. 4, less Line 34, Col. 4) .....	30,771,622	31,403,831	31,999,877	32,269,917	31,013,512
3. Credit life (Line 21, Col. 6) .....					
4. Group, excluding FEGLI/SGLI (Line 21, Col. 9 less Lines 43 & 44, Col. 4) .....	5,123,578	4,564,425	4,418,558	3,412,499	5,161,231
5. Industrial (Line 21, Col. 2) .....					
6. FEGLI/SGLI (Lines 43 & 44, Col. 4) .....					
7. Total (Line 21, Col. 10) .....	54,915,671	55,702,180	56,382,420	55,800,325	57,087,518
<b>New Business Issued</b> (Exhibit of Life Insurance)					
8. Ordinary - whole life and endowment (Line 34, Col. 2) .....	225,733	215,298	282,651	248,747	282,619
9. Ordinary - term (Line 2, Col. 4, less Line 34, Col. 2) .....	2,039,543	1,807,259	2,257,194	3,126,458	4,087,090
10. Credit life (Line 2, Col. 6) .....					
11. Group (Line 2, Col. 9) .....	754,430	671,428	1,368,876	220,338	77,656
12. Industrial (Line 2, Col. 2) .....					
13. Total (Line 2, Col. 10) .....	3,019,705	2,693,985	3,908,721	3,595,543	4,447,365
<b>Premium Income - Lines of Business</b> (Exhibit 1 - Part 1)					
14. Industrial life (Line 20.4, Col. 2) .....					
15.1 Ordinary-life insurance (Line 20.4, Col. 3) .....	107,237,716	109,129,172	121,385,047	106,956,425	108,877,049
15.2 Ordinary-individual annuities (Line 20.4, Col. 4) .....	2,214,579,089	1,619,646,021	648,123,615	558,114,629	347,822,757
16. Credit life (group and individual) (Line 20.4, Col. 5) .....					
17.1 Group life insurance (Line 20.4, Col. 6) .....	33,881,818	29,250,652	38,884,607	7,432,482	15,859,780
17.2 Group annuities (Line 20.4, Col. 7) .....	57,431,734	82,173,596	13,207,120	14,852,843	25,476,641
18.1 A & H-group (Line 20.4, Col. 8) .....	413,784,869	433,825,468	378,603,415	376,893,261	421,836,597
18.2 A & H-credit (group and individual) (Line 20.4, Col. 9) .....					
18.3 A & H-other (Line 20.4, Col. 10) .....	1,012,330	1,120,123	1,220,606	1,361,362	1,495,426
19. Aggregate of all other lines of business (Line 20.4, Col. 11) .....					
20. Total .....	2,827,927,555	2,275,145,032	1,201,424,410	1,065,611,002	921,368,250
<b>Balance Sheet (Pages 2 &amp; 3)</b>					
21. Total admitted assets excluding Separate Accounts business (Page 2, Line 24, Col. 3) .....	16,677,637,195	14,924,593,061	14,021,740,624	14,649,783,108	15,362,616,650
22. Total liabilities excluding Separate Accounts business (Page 3, Line 26) .....	15,262,202,090	13,745,618,402	12,796,742,442	13,383,561,148	14,102,480,756
23. Aggregate life reserves (Page 3, Line 1) .....	12,263,550,221	10,579,100,461	9,424,032,294	9,956,307,267	10,645,676,685
24. Aggregate A & H reserves (Page 3, Line 2) .....	5,440,087	5,744,537	6,185,724	6,916,661	7,333,183
25. Deposit-type contract funds (Page 3, Line 3) .....	2,308,884,223	2,419,277,104	2,634,556,526	2,724,853,234	2,854,619,135
26. Asset valuation reserve (Page 3, Line 24.1) .....	119,046,100	112,732,854	175,321,185	157,828,903	140,178,131
27. Capital (Page 3, Lines 29 and 30) .....	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000
28. Surplus (Page 3, Line 37) .....	1,410,435,105	1,173,974,659	1,219,998,182	1,261,221,960	1,255,135,894
<b>Cash Flow (Page 5)</b>					
29. Net Cash from Operations (Line 11) .....	1,784,293,965	1,163,028,237	(436,196,487)	(584,340,985)	
<b>Risk-Based Capital Analysis</b>					
30. Total adjusted capital .....	1,535,864,935	1,292,670,223	1,400,955,344	1,424,604,507	1,401,000,270
31. Authorized control level risk - based capital .....	185,719,736	167,811,225	150,662,443	147,170,300	153,131,180
<b>Percentage Distribution of Cash, Cash Equivalents and Invested Assets</b> (Page 2, Col. 3) (Line No. /Page 2, Line 10, Col. 3) x 100.0					
32. Bonds (Line 1) .....	89.4	84.8	85.5	86.4	92.0
33. Stocks (Lines 2.1 and 2.2) .....	1.8	5.0	5.2	4.9	1.3
34. Mortgage loans on real estate(Lines 3.1 and 3.2) .....	7.3	6.8	6.2	5.5	5.1
35. Real estate (Lines 4.1, 4.2 and 4.3) .....					
36. Cash, cash equivalents and short-term investments (Line 5) .....	0.3	2.1	0.8	1.2	0.0
37. Contract loans (Line 6) .....	0.5	0.5	0.6	0.6	0.5
38. Other invested assets (Line 7) .....	0.7	0.8	1.6	1.2	1.0
39. Receivables for securities (Line 8) .....	0.1	0.1	0.2	0.2	0.1
40. Aggregate write-ins for invested assets (Line 9) .....	0.0	0.0	0.0	0.0	0.0
41. Cash, cash equivalents and invested assets (Line 10) .....	100.0	100.0	100.0	100.0	100.0

**FIVE-YEAR HISTORICAL DATA**

(Continued)

	1 2009	2 2008	3 2007	4 2006	5 2005
<b>Investments in Parent, Subsidiaries and Affiliates</b>					
42. Affiliated bonds (Schedule D Summary, Line 12, Col. 1) .....					
43. Affiliated preferred stocks (Schedule D Summary, Line 18, Col. 1) .....					
44. Affiliated common stocks (Schedule D Summary Line 24, Col. 1), .....	76,998,356	56,784,961	39,671,645	36,708,889	33,557,879
45. Affiliated short-term investments (subtotal included in Schedule DA Verification, Col. 5, Line 10) .....					
46. Affiliated mortgage loans on real estate .....					
47. All other affiliated .....					
48. Total of above Lines 42 to 47 .....	76,998,356	56,784,961	39,671,645	36,708,889	33,557,879
<b>Total Nonadmitted and Admitted Assets</b>					
49. Total nonadmitted assets (Page 2, Line 26, Col. 2) ..	75,323,498	128,483,550	92,978,659	112,892,656	133,836,059
50. Total admitted assets (Page 2, Line 26, Col. 3) .....	20,799,084,104	18,646,102,949	18,004,829,093	18,364,578,031	18,824,483,188
<b>Investment Data</b>					
51. Net investment income (Exhibit of Net Investment Income) .....	947,509,167	842,865,956	855,779,066	898,118,828	954,203,911
52. Realized capital gains (losses) .....	(108,466,402)	(35,664,675)	48,609,003	75,285,509	62,160,323
53. Unrealized capital gains (losses) .....	55,539,042	(112,267,253)	919,297	13,539,890	(4,755,054)
54. Total of above Lines 51, 52 and 53 .....	894,581,807	694,934,028	905,307,366	986,944,227	1,011,609,180
<b>Benefits and Reserve Increases (Page 6)</b>					
55. Total contract benefits - life (Lines 10, 11, 12, 13, 14 and 15 Col. 1, minus Lines 10, 11, 12, 13, 14 and 15 Cols. 9, 10 and 11) .....	1,200,222,368	1,207,538,400	1,729,605,484	1,809,827,355	1,839,769,831
56. Total contract benefits - A & H (Lines 13 & 14, Cols. 9, 10 & 11) .....	283,497,122	288,810,008	207,739,422	227,304,940	288,586,692
57. Increase in life reserves - other than group and annuities (Line 19, Cols. 2 and 3) .....	(103,398,048)	(8,218,833)	(122,620,840)	(77,779,798)	42,825,770
58. Increase in A & H reserves (Line 19, Cols. 9, 10 & 11) .....	(304,451)	(441,186)	(730,937)	(416,521)	(132,981)
59. Dividends to policyholders (Line 30, Col. 1) .....	5,164	4,090	5,771	6,425	7,572
<b>Operating Percentages</b>					
60. Insurance expense percent (Page 6, Col. 1, Lines 21, 22 & 23, less Line 6)/(Page 6, Col. 1, Line 1 plus Exhibit 7, Col. 2, Line 2) x 100.0 .....	11.8	13.6	22.7	24.9	29.8
61. Lapse percent (ordinary only) [(Exhibit of Life Insurance, Col. 4, Lines 14 & 15) / 1/2 (Exhibit of Life Insurance, Col. 4, Lines 1 & 21)] x 100.0 .....	7.3	6.0	5.8	6.0	6.6
62. A & H loss percent (Schedule H, Part 1, Lines 5 and 6, Col. 2) .....	68.3	66.3	54.5	60.0	68.2
63. A & H cost containment percent (Schedule H, Pt. 1, Line 4, Col. 2) .....	0.0	0.0	0.0	0.0	
64. A & H expense percent excluding cost conatnment expenses (Schedule H, Pt. 1, Line 10, Col. 2) .....	25.3	25.6	28.9	27.2	26.8
<b>A &amp; H Claim Reserve Adequacy</b>					
65. Incurred losses on prior years' claims - group health (Schedule H, Part 3, Line 3.1 Col. 2) .....	82,445,199	68,895,303	58,039,087	101,686,802	86,114,253
66. Prior years' claim liability and reserve - group health (Schedule H, Part 3, Line 3.2 Col. 2) .....	113,989,371	90,064,560	97,489,557	112,635,459	129,847,490
67. Incurred losses on prior years' claims-health other than group (Schedule H, Part 3, Line 3.1 Col. 1 less Col. 2) .....	1,006,162	1,176,223	1,059,165	1,665,813	2,190,270
68. Prior years' claim liability and reserve-health other than Group (Schedule H, Part 3, Line 3.2 Col. 1 less Col. 2) .....	1,298,378	1,145,044	1,515,247	2,296,035	1,936,514
<b>Net Gains From Operations After Federal Income Taxes by Lines of Business (Page 6, Line 33)</b>					
69. Industrial life (Col. 2) .....					
70. Ordinary - life (Col. 3) .....	35,945,212	31,139,357	33,552,831	41,048,484	21,296,725
71. Ordinary - individual annuities (Col. 4) .....	55,806,955	27,278,316	39,447,837	69,792,825	91,973,220
72. Ordinary-supplementary contracts (Col. 5) .....	2,876	257,792	150,405	142,300	142,812
73. Credit life (Col. 6) .....					
74. Group life (Col. 7) .....	2,909,520	1,325,272	(4,315,456)	(545,808)	1,459,699
75. Group annuities (Col. 8) .....	7,533,967	4,849,982	13,753,440	12,293,853	13,986,369
76. A & H-group (Col. 9) .....	27,236,181	33,894,842	51,794,581	43,264,312	22,373,994
77. A & H-credit (Col. 10) .....					
78. A & H-other (Col. 11) .....	32,130	474,661	832,096	418,730	(160,527)
79. Aggregate of all other lines of business (Col. 12) ....					
80. Total (Col. 1) .....	129,466,841	99,220,222	135,215,734	166,414,696	151,072,292

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 and Correction of Errors? Yes [ ] No [ ]  
 If no, please explain: .....



**ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company**

DIRECT BUSINESS IN THE STATE OF Grand Total

DURING THE YEAR 2009

NAIC Group Code 1129

**LIFE INSURANCE**

NAIC Company Code 68608

DIRECT PREMIUMS AND ANNUITY CONSIDERATIONS	1	2	3	4	5
	Ordinary	Credit Life (Group and Individual)	Group	Industrial	Total
1. Life insurance	152,401,927		38,467,545		190,869,472
2. Annuity considerations	2,215,478,603		57,431,734		2,272,910,337
3. Deposit-type contract funds	84,679,743	XXX	22,239,444	XXX	106,919,186
4. Other considerations					
5. Totals (Sum of Lines 1 to 4)	2,452,560,272		118,138,723		2,570,698,996
<b>DIRECT DIVIDENDS TO POLICYHOLDERS</b>					
Life insurance:					
6.1 Paid in cash or left on deposit	4,174				4,174
6.2 Applied to pay renewal premiums	520				520
6.3 Applied to provide paid-up additions or shorten the endowment or premium-paying period	454				454
6.4 Other					
6.5 Totals (Sum of Lines 6.1 to 6.4)	5,148				5,148
Annuities:					
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)	5,148				5,148
<b>DIRECT CLAIMS AND BENEFITS PAID</b>					
9. Death benefits	103,573,439		8,369,465		111,942,904
10. Matured endowments	66,879				66,879
11. Annuity benefits	284,993,436		7,874,752		292,868,188
12. Surrender values and withdrawals for life contracts	677,129,303		151,973,084		829,102,388
13. Aggregate write-ins for miscellaneous direct claims and benefits paid					
14. All other benefits, except accident and health	361,556				361,556
15. Totals	1,066,124,614		168,217,301		1,234,341,915
<b>DETAILS OF WRITE-INS</b>					
1301.					
1302.					
1303.					
1398. Summary of Line 13 from overflow page					
1399. Totals (Lines 1301 thru 1303 plus 1398) (Line 13 above)					

DIRECT DEATH BENEFITS AND MATURED ENDOWMENTS INCURRED	Ordinary		Credit Life (Group and Individual)		Group		Industrial		Total	
	1	2	3	4	5	6	7	8	9	10
	No.	Amount	No. of Ind.Pols. & Gr. Certifs.	Amount	No. of Certifs.	Amount	No.	Amount	No.	Amount
16. Unpaid December 31, prior year	115	9,341,912			5	40,045			120	9,381,957
17. Incurred during current year	1,397	109,868,073			486	8,414,620			1,883	118,282,693
Settled during current year:										
18.1 By payment in full	1,378	103,640,319			487	8,369,465			1,865	112,009,784
18.2 By payment on compromised claims										
18.3 Totals paid	1,378	103,640,319			487	8,369,465			1,865	112,009,784
18.4 Reduction by compromise										
18.5 Amount rejected										
18.6 Total settlements	1,378	103,640,319			487	8,369,465			1,865	112,009,784
19. Unpaid Dec. 31, current year (16+17-18.6)	134	15,569,667			4	85,200			138	15,654,867
<b>POLICY EXHIBIT</b>										
20. In force December 31, prior year	254,273	50,923,825,935	(a)		No. of Policies 4,859	4,554,898,465			259,132	55,478,724,400
21. Issued during year	11,523	2,265,275,646			483	754,429,708			12,006	3,019,705,354
22. Other changes to in force (Net)	(19,906)	(3,590,011,791)			(1,271)	(192,910,536)			(21,177)	(3,782,922,327)
23. In force December 31 of current year	245,890	49,599,089,790	(a)		4,071	5,116,417,637			249,961	54,715,507,427

(a) Includes Individual Credit Life Insurance: prior year \$ ..... current year \$ .....  
 Includes Group Credit Life Insurance: Loans less than or equal to 60 months at issue, prior year \$ ..... , current year \$ .....  
 Loans greater than 60 months at issue BUT NOT GREATER THAN 120 MONTHS, prior year \$ ..... , current year \$ .....

**ACCIDENT AND HEALTH INSURANCE**

	1	2	3	4	5
	Direct Premiums	Direct Premiums Earned	Dividends Paid Or Credited On Direct Business	Direct Losses Paid	Direct Losses Incurred
24. Group Policies (b)	426,601,335	425,886,422		313,990,516	296,429,760
24.1 Federal Employees Health Benefits Program premium (b)					
24.2 Credit (Group and Individual)					
24.3 Collectively Renewable Policies (b)					
24.4 Medicare Title XVIII exempt from state taxes or fees Other Individual Policies:					
25.1 Non-cancelable (b)					
25.2 Guaranteed renewable (b)	1,037,033	1,069,291		1,184,260	540,121
25.3 Non-renewable for stated reasons only (b)					
25.4 Other accident only					
25.5 All other (b)					
25.6 Totals (Sum of Lines 25.1 to 25.5)	1,037,033	1,069,291		1,184,260	540,121
26. Totals (Lines 24 + 24.1 + 24.2 + 24.3 + 24.4 + 25.6)	427,638,367	426,955,713		315,174,776	296,969,881

(b) For health business on indicated lines report: Number of persons insured under PPO managed care products .....0 and number of persons  
 insured under indemnity only products .....22,703 .



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

**EXHIBIT OF LIFE INSURANCE**

	Industrial		Ordinary		Credit Life (Group and Individual)		Group			10 Total Amount of Insurance (a)
	1	2	3	4	5	6	Number of		9	
	Number of Policies	Amount of Insurance (a)	Number of Policies	Amount of Insurance (a)	Number of Individual Policies and Group Certificates	Amount of Insurance (a)	7 Policies	8 Certificates	Amount of Insurance (a)	
1. In force end of prior year .....			259,348	51,137,755			1,026	130,013	4,564,425	55,702,180
2. Issued during year .....			11,523	2,265,276			124	12,144	754,430	3,019,705
3. Reinsurance assumed .....										
4. Revived during year .....			1,109	314,344				9	274	314,618
5. Increased during year (net) .....				63,592				2,375	265,263	328,855
6. Subtotals, Lines 2 to 5 .....			12,632	2,643,212			124	14,528	1,019,967	3,663,178
7. Additions by dividends during year .....	XXX		XXX		XXX		XXX	XXX		
8. Aggregate write-ins for increases .....										
9. Totals (Lines 1 and 6 to 8) .....			271,980	53,780,967			1,150	144,541	5,584,391	59,365,358
Deductions during year:										
10. Death .....			1,334	111,051			XXX	7	122	111,173
11. Maturity .....			62	400			XXX			400
12. Disability .....							XXX			
13. Expiry .....			1,281	85,105						85,105
14. Surrender .....			8,489	1,337,381				680	29,931	1,367,312
15. Lapse .....			9,849	2,331,248			130	20,150	426,095	2,757,343
16. Conversion .....							XXX	XXX	XXX	
17. Decreased (net) .....				102,762				99	4,666	107,428
18. Reinsurance .....			856	20,926						20,926
19. Aggregate write-ins for decreases .....										
20. Totals, (Lines 10 to 19) .....			21,871	3,988,874			130	20,936	460,814	4,449,688
21. In force end of year, (Line 9 minus Line 20) .....			250,109	49,792,093			1,020	123,605	5,123,578	54,915,671
22. Reinsurance ceded end of year .....	XXX		XXX	21,920,945	XXX		XXX	XXX	2,295,519	24,216,464
23. Line 21 minus Line 22 .....	XXX		XXX	27,871,148	XXX	(b)	XXX	XXX	2,828,058	30,699,206
<b>DETAILS OF WRITE-INS</b>										
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) .....										
1901. ....										
1902. ....										
1903. ....										
1998. Summary of remaining write-ins for Line 19 from overflow page .....										
1999. TOTALS (Lines 1901 thru 1903 plus 1998) (Line 19 above) .....										

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

(b) Group \$ ..... ; Individual \$ .....

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

**EXHIBIT OF LIFE INSURANCE (Continued)**

**ADDITIONAL INFORMATION ON INSURANCE IN FORCE END OF YEAR**

	Industrial		Ordinary	
	1 Number of Policies	2 Amount of Insurance (a)	3 Number of Policies	4 Amount of Insurance (a)
24. Additions by dividends .....	XXX		XXX	22
25. Other paid-up insurance .....			9,839	46,950
26. Debit ordinary insurance .....	XXX	XXX		

**ADDITIONAL INFORMATION ON ORDINARY INSURANCE**

Term Insurance Excluding Extended Term Insurance	Issued During Year (Included in Line 2)		In Force End of Year (Included in Line 21)	
	1 Number of Policies	2 Amount of Insurance (a)	3 Number of Policies	4 Amount of Insurance (a)
27. Term policies - decreasing .....			4,316	254,007
28. Term policies - other .....	8,302	2,039,543	113,815	30,016,467
29. Other term insurance - decreasing .....	XXX		XXX	
30. Other term insurance .....	XXX		XXX	493,050
31. Totals, Lines 27 to 30 .....	8,302	2,039,543	118,131	30,763,524
Reconciliation to Lines 2 and 21:				
32. Term additions .....	XXX		XXX	
33. Totals, extended term insurance .....	XXX	XXX	1,156	8,098
34. Totals, whole life and endowment .....	3,221	225,733	130,822	19,020,471
35. Totals (Lines 31 to 34) .....	11,523	2,265,276	250,109	49,792,093

**CLASSIFICATION OF AMOUNT OF INSURANCE (a) BY PARTICIPATING STATUS**

	Issued During Year (Included in Line 2)		In Force End of Year (Included in Line 21)	
	1 Non-Participating	2 Participating	3 Non-Participating	4 Participating
36. Industrial .....				
37. Ordinary .....	2,265,276		49,791,809	283
38. Credit Life (Group and Individual) .....				
39. Group .....	754,430		5,123,578	
40. Totals (Lines 36 to 39) .....	3,019,705		54,915,387	283

**ADDITIONAL INFORMATION ON CREDIT LIFE AND GROUP INSURANCE**

	Credit Life		Group	
	1 Number of Individual Policies and Group Certificates	2 Amount of Insurance (a)	3 Number of Certificates	4 Amount of Insurance (a)
41. Amount of insurance included in Line 2 ceded to other companies .....	XXX		XXX	
42. Number in force end of year if the number under shared groups is counted on a pro-rata basis .....		XXX	123,605	XXX
43. Federal Employees' Group Life Insurance included in Line 21 .....				
44. Servicemen's Group Life Insurance included in Line 21 .....				
45. Group Permanent Insurance included in Line 21 .....				

**ADDITIONAL ACCIDENTAL DEATH BENEFITS**

46. Amount of additional accidental death benefits in force end of year under ordinary policies (a)	232,005
---	---------

**BASIS OF CALCULATION OF ORDINARY TERM INSURANCE**

47. State basis of calculation of (47.1) decreasing term insurance contained in Family Income, Mortgage Protection, etc., policies and riders and of (47.2) term insurance on wife and children under Family, Parent and Children, etc., policies and riders included above.
47.1 Face amount as of last policy anniversary .....
47.2 Family policies: \$3000 per unit for some products and face amount as of last policy anniversary for some products. Wife rider on family policies: Commuted value on some products and \$115 per unit or more depending on issue age of wife on some products. Child rider on family policies: \$200 per unit on some products and \$2000 per unit on some products. Child riders attached to policies other than family policies: \$1000 per unit

**POLICIES WITH DISABILITY PROVISIONS**

Disability Provisions	Industrial		Ordinary		Credit		Group	
	1 Number of Policies	2 Amount of Insurance (a)	3 Number of Policies	4 Amount of Insurance (a)	5 Number of Policies	6 Amount of Insurance (a)	7 Number of Certificates	8 Amount of Insurance (a)
48. Waiver of Premium .....			20,168	1,622,860			104,627	3,930,571
49. Disability Income .....								
50. Extended Benefits .....			XXX	XXX				
51. Other .....			3	25				
52. Total .....		(b)	20,171	(b) 1,622,885		(b)	104,627	(b) 3,930,571

(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, CERTIFICATES, INCOME PAYABLE AND ACCOUNT VALUES IN FORCE FOR SUPPLEMENTARY CONTRACTS, ANNUITIES, ACCIDENT & HEALTH AND OTHER POLICIES**

**SUPPLEMENTARY CONTRACTS**

	Ordinary		Group	
	1 Involving Life Contingencies	2 Not Involving Life Contingencies	3 Involving Life Contingencies	4 Not Involving Life Contingencies
1. In force end of prior year .....	3	37		
2. Issued during year .....		4		
3. Reinsurance assumed .....				
4. Increased during year (net) .....				
5. Total (Lines 1 to 4) .....	3	41		
Deductions during year:				
6. Decreased (net) .....		9		
7. Reinsurance ceded .....				
8. Totals (Lines 6 and 7) .....		9		
9. In force end of year .....	3	32		
10. Amount on deposit .....	103,552	(a) 1,107,125		(a)
11. Income now payable .....				
12. Amount of income payable .....	(a) 11,979	(a)	(a)	(a)

**ANNUITIES**

	Ordinary		Group	
	1 Immediate	2 Deferred	3 Contracts	4 Certificates
1. In force end of prior year .....	49,396	100,662	6,812	42,571
2. Issued during year .....	1,791	29,186	934	1,898
3. Reinsurance assumed .....				
4. Increased during year (net) .....				
5. Totals (Lines 1 to 4) .....	51,187	129,848	7,746	44,469
Deductions during year:				
6. Decreased (net) .....	3,231	9,918	1,296	6,670
7. Reinsurance ceded .....	7			
8. Totals (Lines 6 and 7) .....	3,238	9,918	1,296	6,670
9. In force end of year .....	47,949	119,930	6,450	37,799
Income now payable:				
10. Amount of income payable .....	(a) 603,668,658	XXX	XXX	(a) 9,355,048
Deferred fully paid:				
11. Account balance .....	XXX	(a) 5,251,217,249	XXX	(a) 62,474,628
Deferred not fully paid:				
12. Account balance .....	XXX	(a) 1,509,620,865	XXX	(a) 977,384,767

**ACCIDENT AND HEALTH INSURANCE**

	Group		Credit		Other	
	1 Certificates	2 Premiums in Force	3 Policies	4 Premiums in Force	5 Policies	6 Premiums in Force
1. In force end of prior year .....	1,346,810	409,239,105			1,331	938,271
2. Issued during year .....	176,270	74,495,064				
3. Reinsurance assumed .....						
4. Increased during year (net) .....		XXX		XXX		XXX
5. Totals (Lines 1 to 4) .....	1,523,080	XXX		XXX	1,331	XXX
Deductions during year:						
6. Conversions .....		XXX	XXX	XXX	XXX	XXX
7. Decreased (net) .....	296,460	XXX		XXX	121	XXX
8. Reinsurance ceded .....		XXX		XXX		XXX
9. Totals (Lines 6 to 8) .....	296,460	XXX		XXX	121	XXX
10. In force end of year .....	1,226,620	(a) 404,626,440		(a)	1,210	(a) 854,013

**DEPOSIT FUNDS AND DIVIDEND ACCUMULATIONS**

	1	2
	Deposit Funds Contracts	Dividend Accumulations Contracts
1. In force end of prior year .....	703	110
2. Issued during year .....	171	
3. Reinsurance assumed .....		
4. Increased during year (net) .....		
5. Totals (Lines 1 to 4) .....	874	110
Deductions During Year:		
6. Decreased (net) .....	90	1
7. Reinsurance ceded .....		
8. Totals (Lines 6 and 7) .....	90	1
9. In force end of year .....	784	109
10. Amount of account balance .....	(a) 124,211,410	(a) 245,199

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

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

**INTEREST MAINTENANCE RESERVE**

	1 Amount
1. Reserve as of December 31, Prior Year .....	260,779,069
2. Current year's realized pre-tax capital gains/(losses) of \$ .....(1,113,884) transferred into the reserve net of taxes of \$ .....(389,859) .....	(724,025)
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) .....	260,055,044
5. Current year's amortization released to Summary of Operations (Amortization, Line 1, Column 4) .....	19,827,539
6. Reserve as of December 31, current year (Line 4 minus Line 5)	240,227,505

**AMORTIZATION**

Year of Amortization	1 Reserve as of December 31, Prior Year	2 Current Year's Realized Capital Gains/(Losses) Transferred into the Reserve Net of Taxes	3 Adjustment for Current Year's Liability Gains/(Losses) Released From the Reserve	4 Balance Before Reduction for Current Year's Amortization (Cols. 1 + 2 + 3)
1. 2009 .....	20,213,199	(385,660)		19,827,539
2. 2010 .....	20,563,584	(576,279)		19,987,305
3. 2011 .....	21,124,330	(103,793)		21,020,537
4. 2012 .....	21,433,019	(96,090)		21,336,929
5. 2013 .....	21,101,744	(90,800)		21,010,944
6. 2014 .....	20,359,069	(80,074)		20,278,995
7. 2015 .....	19,448,088	(63,416)		19,384,672
8. 2016 .....	18,346,727	(42,513)		18,304,214
9. 2017 .....	16,939,266	(19,455)		16,919,811
10. 2018 .....	15,053,017	3,285		15,056,302
11. 2019 .....	12,858,864	29,260		12,888,124
12. 2020 .....	10,501,096	45,518		10,546,614
13. 2021 .....	8,312,760	50,281		8,363,041
14. 2022 .....	6,338,012	56,712		6,394,724
15. 2023 .....	5,200,203	62,902		5,263,105
16. 2024 .....	4,101,583	70,603		4,172,186
17. 2025 .....	3,907,255	69,278		3,976,533
18. 2026 .....	3,356,506	60,289		3,416,795
19. 2027 .....	2,925,462	51,587		2,977,049
20. 2028 .....	2,397,927	41,082		2,439,009
21. 2029 .....	1,879,319	29,929		1,909,248
22. 2030 .....	1,388,751	24,054		1,412,805
23. 2031 .....	934,156	23,345		957,501
24. 2032 .....	582,379	22,205		604,584
25. 2033 .....	599,518	21,499		621,017
26. 2034 .....	432,976	20,217		453,193
27. 2035 .....	237,032	17,914		254,946
28. 2036 .....	167,012	14,447		181,459
29. 2037 .....	68,104	10,691		78,795
30. 2038 .....	8,111	6,646		14,757
31. 2039 and Later		2,312		2,312
32. Total (Lines 1 to 31)	260,779,069	(724,025)		260,055,044

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

**ASSET VALUATION RESERVE**

	Default Component			Equity Component			7 Total Amount (Cols. 3 + 6)
	1 Other Than Mortgage Loans	2 Mortgage Loans	3 Total (Cols. 1 + 2)	4 Common Stock	5 Real Estate and Other Invested Assets	6 Total (Cols. 4 + 5)	
1. Reserve as of December 31, prior year .....	101,549,402	9,408,110	110,957,512		1,775,342	1,775,342	112,732,854
2. Realized capital gains/(losses) net of taxes - General Account .....	(53,640,162)	(1,423,532)	(55,063,694)	(14,258,686)	(638,778)	(14,897,464)	(69,961,158)
3. Realized capital gains/(losses) net of taxes - Separate Accounts .....	(5,667,313)		(5,667,313)				(5,667,313)
4. Unrealized capital gains/(losses) net of deferred taxes - General Account .....	4,456,333		4,456,333	39,036,750	(6,479,869)	32,556,881	37,013,214
5. Unrealized capital gains/(losses) net of deferred taxes - Separate Accounts .....	718,846		718,846				718,846
6. Capital gains credited/(losses charged) to contract benefits, payments or reserves .....							
7. Basic contribution .....	32,524,920	3,763,429	36,288,349		556,444	556,444	36,844,793
8. Accumulated balances (Lines 1 through 5 - 6 + 7) .....	79,942,027	11,748,008	91,690,034	24,778,065	(4,786,860)	19,991,203	111,681,240
9. Maximum reserve .....	156,203,196	11,456,580	167,659,777	30,598,002	1,873,464	32,471,467	200,131,242
10. Reserve objective .....	109,326,637	7,340,330	116,666,967	30,598,002	1,240,577	31,838,579	148,505,546
11. 20% of (Line 10 - Line 8) .....	5,876,922	(881,536)	4,995,386	1,163,987	1,205,487	2,369,474	7,364,861
12. Balance before transfers (Lines 8 + 11) .....	85,818,949	10,866,472	96,685,420	25,942,052	(3,581,373)	22,360,678	119,046,100
13. Transfers .....				(3,581,373)	3,581,373		XXX
14. Voluntary contribution .....							
15. Adjustment down to maximum/up to zero .....							
16. Reserve as of December 31, current year (Lines 12 + 13 + 14 + 15)	85,818,949	10,866,472	96,685,420	22,360,679		22,360,678	119,046,100

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

Line Number	NAIC Designation	Description	1 Book/Adjusted Carrying Value	2 Reclassify Related Party Encumbrances	3 Add Third Party Encumbrances	4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3)	Basic Contribution		Reserve Objective		Maximum Reserve	
							5 Factor	6 Amount (Cols.4 x 5)	7 Factor	8 Amount (Cols. 4 x 7)	9 Factor	10 Amount (Cols. 4 x 9)
LONG-TERM BONDS												
1.		Exempt Obligations .....	363,501,590	XXX	XXX	363,501,590	0.0000		0.0000		0.0000	
2.	1	Highest Quality .....	7,591,398,967	XXX	XXX	7,591,398,967	0.0004	3,036,560	0.0023	17,460,218	0.0030	22,774,197
3.	2	High Quality .....	5,473,702,491	XXX	XXX	5,473,702,491	0.0019	10,400,035	0.0058	31,747,474	0.0090	49,263,322
4.	3	Medium Quality .....	651,044,771	XXX	XXX	651,044,771	0.0093	6,054,716	0.0230	14,974,030	0.0340	22,135,522
5.	4	Low Quality .....	242,565,180	XXX	XXX	242,565,180	0.0213	5,166,638	0.0530	12,855,955	0.0750	18,192,389
6.	5	Lower Quality .....	114,145,564	XXX	XXX	114,145,564	0.0432	4,931,088	0.1100	12,556,012	0.1700	19,404,746
7.	6	In or Near Default .....	43,752,459	XXX	XXX	43,752,459	0.0000		0.2000	8,750,492	0.2000	8,750,492
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)	14,480,111,022	XXX	XXX	14,480,111,022	XXX	29,589,037	XXX	98,344,180	XXX	140,520,668
PREFERRED STOCK												
10.	1	Highest Quality .....		XXX	XXX		0.0004		0.0023		0.0030	
11.	2	High Quality .....	58,243,770	XXX	XXX	58,243,770	0.0019	110,663	0.0058	337,814	0.0090	524,194
12.	3	Medium Quality .....	4,487,851	XXX	XXX	4,487,851	0.0093	41,737	0.0230	103,221	0.0340	152,587
13.	4	Low Quality .....	447,324	XXX	XXX	447,324	0.0213	9,528	0.0530	23,708	0.0750	33,549
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)	63,178,945	XXX	XXX	63,178,945	XXX	161,928	XXX	464,743	XXX	710,330
SHORT - TERM BONDS												
18.		Exempt Obligations .....	94,920,630	XXX	XXX	94,920,630	0.0000		0.0000		0.0000	
19.	1	Highest Quality .....		XXX	XXX		0.0004		0.0023		0.0030	
20.	2	High Quality .....		XXX	XXX		0.0019		0.0058		0.0090	
21.	3	Medium Quality .....		XXX	XXX		0.0093		0.0230		0.0340	
22.	4	Low Quality .....		XXX	XXX		0.0213		0.0530		0.0750	
23.	5	Lower Quality .....		XXX	XXX		0.0432		0.1100		0.1700	
24.	6	In or Near Default .....		XXX	XXX		0.0000		0.2000		0.2000	
25.		Total Short - Term Bonds (Sum of lines 18 through 24)	94,920,630	XXX	XXX	94,920,630	XXX		XXX		XXX	

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

Line Number	NAIC Designation	Description	1 Book/Adjusted Carrying Value	2 Reclassify Related Party Encumbrances	3 Add Third Party Encumbrances	4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3)	Basic Contribution		Reserve Objective		Maximum Reserve	
							5 Factor	6 Amount (Cols. 4 x 5)	7 Factor	8 Amount (Cols. 4 x 7)	9 Factor	10 Amount (Cols. 4 x 9)
<b>DERIVATIVE INSTRUMENTS</b>												
26.		Exchange Traded .....	1,776,506	XXX	XXX	1,776,506	0.0004	711	0.0023	4,086	0.0030	5,330
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 .....	1,776,506	XXX	XXX	1,776,506	XXX	711	XXX	4,086	XXX	5,330
34.		Total (Lines 9 + 17 + 25 + 33) .....	14,639,987,103	XXX	XXX	14,639,987,103	XXX	29,751,676	XXX	98,813,009	XXX	141,236,327
<b>MORTGAGE LOANS</b>												
In Good Standing:												
35.		Farm Mortgages .....			XXX		0.0063 (a)		0.0120 (a)		0.0190 (a)	
36.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0003		0.0006		0.0010	
37.		Residential Mortgages - All Other .....			XXX		0.0013		0.0030		0.0040	
38.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0003		0.0006		0.0010	
39.		Commercial Mortgages - All Other .....	1,176,071,609		XXX	1,176,071,609	0.0032 (a)	3,763,429	0.0060 (a)	7,056,430	0.0095 (a)	11,172,680
40.		In Good Standing With Restructured Terms .....			XXX		0.2800 (b)		0.6200 (b)		1.0000 (b)	
Overdue, Not in Process:												
41.		Farm Mortgages .....			XXX		0.0420		0.0760		0.1200	
42.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0005		0.0012		0.0020	
43.		Residential Mortgages - All Other .....			XXX		0.0025		0.0058		0.0090	
44.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0005		0.0012		0.0020	
45.		Commercial Mortgages - All Other .....			XXX		0.0420		0.0760		0.1200	
In Process of Foreclosure:												
46.		Farm Mortgages .....			XXX		0.0000		0.1700		0.1700	
47.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0000		0.0040		0.0040	
48.		Residential Mortgages - All Other .....			XXX		0.0000		0.0130		0.0130	
49.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0000		0.0040		0.0040	
50.		Commercial Mortgages - All Other .....	1,670,000		XXX	1,670,000	0.0000		0.1700	283,900	0.1700	283,900
51.		Total Schedule B Mortgages (Sum of Lines 35 through 50) (Page 2, Line 3, Net Admitted Asset) .....	1,177,741,609		XXX	1,177,741,609	XXX	3,763,429	XXX	7,340,330	XXX	11,456,580
52.		Schedule DA Mortgages .....			XXX		(c)		(c)		(c)	
53.		Total Mortgage Loans on Real Estate (Line 51 + 52) .....	1,177,741,609		XXX	1,177,741,609	XXX	3,763,429	XXX	7,340,330	XXX	11,456,580

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

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

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

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

Line Number	NAIC Designation	Description	1 Book/Adjusted Carrying Value	2 Reclassify Related Party Encumbrances	3 Add Third Party Encumbrances	4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3)	Basic Contribution		Reserve Objective		Maximum Reserve	
							5 Factor	6 Amount (Cols.4 x 5)	7 Factor	8 Amount (Cols. 4 x 7)	9 Factor	10 Amount (Cols. 4 x 9)
COMMON STOCK												
1.		Unaffiliated - Public .....	149,905,772	XXX	XXX	149,905,772	0.0000		0.2000 (d)	29,981,154	0.2000 (d)	29,981,154
2.		Unaffiliated - Private .....		XXX	XXX		0.0000		0.1600		0.1600	
3.		Federal Home Loan Bank .....		XXX	XXX		0.0000		0.0050		0.0080	
4.		Affiliated - Life with AVR .....	72,253,372	XXX	XXX	72,253,372	0.0000		0.0000		0.0000	
Affiliated - Investment Subsidiary:												
5.		Fixed Income - Exempt Obligations .....					XXX		XXX		XXX	
6.		Fixed Income - Highest Quality .....					XXX		XXX		XXX	
7.		Fixed Income - High Quality .....					XXX		XXX		XXX	
8.		Fixed Income - Medium Quality .....					XXX		XXX		XXX	
9.		Fixed Income - Low Quality .....					XXX		XXX		XXX	
10.		Fixed Income - Lower Quality .....					XXX		XXX		XXX	
11.		Fixed Income - In/Near Default .....					XXX		XXX		XXX	
12.		Unaffiliated Common Stock - Public .....					0.0000		0.1300 (d)		0.1300 (d)	
13.		Unaffiliated Common Stock - Private .....					0.0000		0.1600		0.1600	
14.		Mortgage Loans .....					(c)		(c)		(c)	
15.		Real Estate .....					(e)		(e)		(e)	
16.		Affiliated - Certain Other (See SVO Purposes and Procedures Manual) .....	4,744,984	XXX	XXX	4,744,984	0.0000		0.1300	616,848	0.1300	616,848
17.		Affiliated - All Other .....		XXX	XXX		0.0000		0.1600		0.1600	
18.		Total Common Stock (Sum of Lines 1 through 17)(Page 2, Line 2.2, Net Admitted Asset)	226,904,128			226,904,128	XXX		XXX	30,598,002	XXX	30,598,002
REAL ESTATE												
19.		Home Office Property (General Account only) .....					0.0000		0.0750		0.0750	
20.		Investment Properties .....					0.0000		0.0750		0.0750	
21.		Properties Acquired in Satisfaction of Debt .....					0.0000		0.1100		0.1100	
22.		Total Real Estate (Sum of Lines 19 through 21)					XXX		XXX		XXX	
OTHER INVESTED ASSETS												
INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF BONDS												
23.		Exempt Obligations .....		XXX	XXX		0.0000		0.0000		0.0000	
24.	1	Highest Quality .....		XXX	XXX		0.0004		0.0023		0.0030	
25.	2	High Quality .....		XXX	XXX		0.0019		0.0058		0.0090	
26.	3	Medium Quality .....		XXX	XXX		0.0093		0.0230		0.0340	
27.	4	Low Quality .....		XXX	XXX		0.0213		0.0530		0.0750	
28.	5	Lower Quality .....		XXX	XXX		0.0432		0.1100		0.1700	
29.	6	In or Near Default .....		XXX	XXX		0.0000		0.2000		0.2000	
30.		Total with Bond characteristics (Sum of Lines 23 through 29)		XXX	XXX		XXX		XXX		XXX	



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

Line Number	NAIC Designation	Description	1 Book/Adjusted Carrying Value	2 Reclassify Related Party Encumbrances	3 Add Third Party Encumbrances	4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3)	Basic Contribution		Reserve Objective		Maximum Reserve	
							5 Factor	6 Amount (Cols. 4 x 5)	7 Factor	8 Amount (Cols. 4 x 7)	9 Factor	10 Amount (Cols. 4 x 9)
INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF PREFERRED STOCKS												
31.	1	Highest Quality .....	34,988,317	XXX	XXX	34,988,317	0.0004	13,995	0.0023	80,473	0.0030	104,965
32.	2	High Quality .....		XXX	XXX		0.0019		0.0058		0.0090	
33.	3	Medium Quality .....		XXX	XXX		0.0093		0.0230		0.0340	
34.	4	Low Quality .....		XXX	XXX		0.0213		0.0530		0.0750	
35.	5	Lower Quality .....		XXX	XXX		0.0432		0.1100		0.1700	
36.	6	In or Near Default .....		XXX	XXX		0.0000		0.2000		0.2000	
37.		Affiliated Life with AVR .....		XXX	XXX		0.0000		0.0000		0.0000	
38.		Total with Preferred Stock characteristics (Sum of Lines 31 through 37)	34,988,317	XXX	XXX	34,988,317	XXX	13,995	XXX	80,473	XXX	104,965
INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF MORTGAGE LOANS												
In Good Standing:												
39.		Farm Mortgages .....			XXX		0.0063 (a)		0.0120 (a)		0.0190 (a)	
40.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0003		0.0006		0.0010	
41.		Residential Mortgages - All Other .....		XXX	XXX		0.0013		0.0030		0.0040	
42.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0003		0.0006		0.0010	
43.		Commercial Mortgages - All Other .....			XXX		0.0063 (a)		0.0120 (a)		0.0190 (a)	
44.		In Good Standing With Restructured Terms .....			XXX		0.2800 (b)		0.6200 (b)		1.0000 (b)	
Overdue, Not in Process:												
45.		Farm Mortgages .....			XXX		0.0420		0.0760		0.1200	
46.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0005		0.0012		0.0020	
47.		Residential Mortgages - All Other .....			XXX		0.0025		0.0058		0.0090	
48.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0005		0.0012		0.0020	
49.		Commercial Mortgages - All Other .....			XXX		0.0420		0.0760		0.1200	
In Process of Foreclosure:												
50.		Farm Mortgages .....			XXX		0.0000		0.1700		0.1700	
51.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0000		0.0040		0.0040	
52.		Residential Mortgages - All Other .....			XXX		0.0000		0.0130		0.0130	
53.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0000		0.0040		0.0040	
54.		Commercial Mortgages - All Other .....			XXX		0.0000		0.1700		0.1700	
55.		Total with Mortgage Loan Characteristics (Sum of Lines 39 through 54)			XXX		XXX		XXX		XXX	

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

Line Number	NAIC Designation	Description	1 Book/Adjusted Carrying Value	2 Reclassify Related Party Encumbrances	3 Add Third Party Encumbrances	4 Balance for AVR Reserve Calculations (Cols. 1 + 2 + 3)	Basic Contribution		Reserve Objective		Maximum Reserve	
							5 Factor	6 Amount (Cols.4 x 5)	7 Factor	8 Amount (Cols. 4 x 7)	9 Factor	10 Amount (Cols. 4 x 9)
INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF COMMON STOCK												
56.		Unaffiliated Public .....		XXX	XXX		0.0000		0.1300 (d)		0.1300 (d)	
57.		Unaffiliated Private .....		XXX	XXX		0.0000		0.1600		0.1600	
58.		Affiliated Life with AVR .....		XXX	XXX		0.0000		0.0000		0.0000	
59.		Affiliated Certain Other (See SVO Purposes & Procedures Manual) .....		XXX	XXX		0.0000		0.1300		0.1300	
60.		Affiliated Other – All Other .....		XXX	XXX		0.0000		0.1600		0.1600	
61.		Total with Common Stock characteristics (Sum of Lines 56 through 60)		XXX	XXX		XXX		XXX		XXX	
INVESTMENTS WITH THE UNDERLYING CHARACTERISTICS OF REAL ESTATE												
62.		Home Office Property (General Account only) .....					0.0000		0.0750		0.0750	
63.		Investment Properties .....					0.0000		0.0750		0.0750	
64.		Properties Acquired in Satisfaction of Debt .....					0.0000		0.1100		0.1100	
65.		Total with Real Estate Characteristics (Lines 62 through 64)					XXX		XXX		XXX	
LOW INCOME HOUSING TAX CREDIT INVESTMENTS												
66.		Guaranteed Federal Low Income Housing Tax Credit .....					0.0003		0.0006		0.0010	
67.		Non-guaranteed Federal Low Income Housing Tax Credit .....	82,993,824			82,993,824	0.0063	522,861	0.0120	995,926	0.0190	1,576,883
68.		State Low Income Housing Tax Credit .....	665,859			665,859	0.0273	18,178	0.0600	39,952	0.0975	64,921
69.		All Other Low Income Housing Tax Credit .....					0.0273		0.0600		0.0975	
70.		Total LIHTC	83,659,683			83,659,683	XXX	541,039	XXX	1,035,877	XXX	1,641,804
ALL OTHER INVESTMENTS												
71.		Other Invested Assets – Schedule BA .....	893,211	XXX		893,211	0.0000		0.1300	116,117	0.1300	116,117
72.		Other Short-Term Invested Assets - Schedule DA .....		XXX			0.0000		0.1300		0.1300	
73.		Total All Other (Sum of Lines 71 + 72) .....	893,211	XXX		893,211	XXX		XXX	116,117	XXX	116,117
74.		Total Other Invested Assets - Schedules BA & DA (Sum of Lines 30, 38, 55, 61, 65, 70 and 73)	119,541,211			119,541,211	XXX	555,034	XXX	1,232,468	XXX	1,862,886

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

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

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

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

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

**ASSET VALUATION RESERVE (Continued)**

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

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

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

**SCHEDULE F**

Showing all claims for death losses and all other contract claims resisted or compromised during the year, and all claims for death losses and all other contract claims resisted December 31 of current year.

1	2	3	4	5	6	7	8
Contract Numbers	Claim Numbers	State of Residence of Claimant	Year of Claim for Death or Disability	Amount Claimed	Amount Paid During the Year	Amount Resisted Dec. 31 of Current Year	Why Compromised or Resisted
0599999. Death Claims - Disposed Of							XXX
1099999. Additional Accidental Death Benefits Claims - Disposed Of							XXX
1599999. Disability Benefits Claims - Disposed Of							XXX
2099999. Matured Endowments Claims - Disposed Of							XXX
2599999. Annuities with Life Contingency Claims - Disposed Of							XXX
2699999. Claims Disposed of During Current Year							XXX
AA4014790	08L0454	MS	2008	200,000		200,000	Material misrepresentation on policy application
2799999. Death Claims - Ordinary				200,000		200,000	XXX
3199999. Death Claims - Resisted				200,000		200,000	XXX
3699999. Additional Accidental Death Benefits Claims - Resisted							XXX
4199999. Disability Benefits Claims - Resisted							XXX
4699999. Matured Endowments Claims - Resisted							XXX
5199999. Annuities with Life Contingencies Claims - Resisted							XXX
5299999. Claims Resisted During Current Year				200,000		200,000	XXX
5399999 - Totals				200,000		200,000	XXX

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

**SCHEDULE H - ACCIDENT AND HEALTH EXHIBIT**

	Total		Group Accident and Health		Credit Accident and Health (Group and Individual)		Collectively Renewable		Other Individual Contracts									
									Non-Cancelable		Guaranteed Renewable		Non-Renewable for Stated Reasons Only		Other Accident Only		All Other	
	1 Amount	2 %	3 Amount	4 %	5 Amount	6 %	7 Amount	8 %	9 Amount	10 %	11 Amount	12 %	13 Amount	14 %	15 Amount	16 %	17 Amount	18 %
<b>PART 1. - ANALYSIS OF UNDERWRITING OPERATIONS</b>																		
1. Premiums written	415,568,368	XXX	414,556,038	XXX		XXX		XXX		XXX	1,012,330	XXX		XXX		XXX		XXX
2. Premiums earned	414,810,892	XXX	413,785,226	XXX		XXX		XXX		XXX	1,025,666	XXX		XXX		XXX		XXX
3. Incurred claims	283,639,194	68.4	283,163,017	68.4							476,177	46.4						
4. Cost containment expenses	30,317	0.0	30,317	0.0														
5. Incurred claims and cost containment expenses (Lines 3 and 4)	283,669,511	68.4	283,193,334	68.4							476,177	46.4						
6. Increase in contract reserves	(432,831)	(0.1)	(427,431)	(0.1)							(5,400)	(0.5)						
7. Commissions (a)	34,293,085	8.3	34,280,180	8.3							12,905	1.3						
8. Other general insurance expenses	59,812,570	14.4	59,606,968	14.4							205,602	20.0						
9. Taxes, licenses and fees	10,841,213	2.6	10,812,309	2.6							28,904	2.8						
10. Total other expenses incurred	104,946,868	25.3	104,699,457	25.3							247,411	24.1						
11. Aggregate write-ins for deductions																		
12. Gain from underwriting before dividends or refunds	26,627,344	6.4	26,319,866	6.4							307,478	30.0						
13. Dividends or refunds																		
14. Gain from underwriting after dividends or refunds	26,627,344	6.4	26,319,866	6.4							307,478	30.0						
<b>DETAILS OF WRITE-INS</b>																		
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)																		

(a) Includes \$ ..... reported as "Contract, membership and other fees retained by agents."

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**SCHEDULE H - ACCIDENT AND HEALTH EXHIBIT (Continued)**

	1 Total	2 Group Accident and Health	3 Credit Accident and Health (Group and Individual)	4 Collectively Renewable	Other Individual Contracts				
					5 Non-Cancelable	6 Guaranteed Renewable	7 Non-Renewable for Stated Reasons Only	8 Other Accident Only	9 All Other
<b>PART 2. - RESERVES AND LIABILITIES</b>									
<b>A. Premium Reserves:</b>									
1. Unearned premiums .....	143,950	2,979				140,971			
2. Advance premiums .....	1,696,247	1,696,247							
3. Reserve for rate credits .....									
4. Total premium reserves, current year .....	1,840,197	1,699,226				140,971			
5. Total premium reserves, prior year .....	1,082,721	928,414				154,307			
6. Increase in total premium reserves .....	757,476	770,812				(13,336)			
<b>B. Contract Reserves:</b>									
1. Additional reserves (a) .....	4,077,687	2,335,625				1,742,062			
2. Reserve for future contingent benefits .....									
3. Total contract reserves, current year .....	4,077,687	2,335,625				1,742,062			
4. Total contract reserves, prior year .....	4,510,518	2,763,056				1,747,462			
5. Increase in contract reserves .....	(432,831)	(427,431)				(5,400)			
<b>C. Claim Reserves and Liabilities:</b>									
1. Total current year .....	101,169,564	99,790,114				1,379,450			
2. Total prior year .....	115,287,749	113,989,371				1,298,378			
3. Increase .....	(14,118,185)	(14,199,257)				81,072			

<b>PART 3. - TEST OF PRIOR YEAR'S CLAIM RESERVES AND LIABILITIES</b>									
<b>1. Claims paid during the year:</b>									
1.1 On claims incurred prior to current year .....	76,858,424	76,557,582				300,842			
1.2 On claims incurred during current year .....	220,898,955	220,804,692				94,263			
<b>2. Claim reserves and liabilities, December 31, current year:</b>									
2.1 On claims incurred prior to current year .....	6,592,937	5,887,617				705,320			
2.2 On claims incurred during current year .....	94,576,627	93,902,497				674,130			
<b>3. Test:</b>									
3.1 Lines 1.1 and 2.1 .....	83,451,361	82,445,199				1,006,162			
3.2 Claim reserves and liabilities, December 31, prior year .....	115,287,749	113,989,371				1,298,378			
3.3 Line 3.1 minus Line 3.2 .....	(31,836,388)	(31,544,172)				(292,216)			

<b>PART 4. - REINSURANCE</b>									
<b>A. Reinsurance Assumed:</b>									
1. Premiums written .....	432,218	432,218							
2. Premiums earned .....	445,413	445,413							
3. Incurred claims .....	77,895	77,895							
4. Commissions .....	100,403	100,403							
<b>B. Reinsurance Ceded:</b>									
1. Premiums written .....	12,416,750	12,359,791				56,959			
2. Premiums earned .....	12,608,321	12,546,966				61,355			
3. Incurred claims .....	13,408,585	13,344,640				63,945			
4. Commissions .....									

(a) Includes \$ ..... premium deficiency reserve.

## ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company

**SCHEDULE H - PART 5 - HEALTH CLAIMS**

	1 Medical	2 Dental	3 Other	4 Total
<b>A. Direct:</b>				
1. Incurred Claims .....	295,427,859		1,542,025	296,969,884
2. Beginning Claim Reserves and Liabilities .....	178,067,562		1,990,604	180,058,166
3. Ending Claim Reserves and Liabilities .....	159,818,930		2,034,345	161,853,275
4. Claims Paid	313,676,491		1,498,284	315,174,775
<b>B. Assumed Reinsurance:</b>				
5. Incurred Claims.....	77,895			77,895
6. Beginning Claim Reserves and Liabilities .....	176,121			176,121
7. Ending Claim Reserves and Liabilities .....	102,510			102,510
8. Claims Paid	151,506			151,506
<b>C. Ceded Reinsurance:</b>				
9. Incurred Claims.....	13,344,640		63,945	13,408,585
10. Beginning Claim Reserves and Liabilities .....	64,936,579		702,145	65,638,724
11. Ending Claim Reserves and Liabilities .....	61,029,945		661,156	61,691,101
12. Claims Paid	17,251,274		104,934	17,356,208
<b>D. Net:</b>				
13. Incurred Claims.....	282,161,114		1,478,080	283,639,194
14. Beginning Claim Reserves and Liabilities .....	113,307,104		1,288,459	114,595,563
15. Ending Claim Reserves and Liabilities .....	98,891,495		1,373,189	100,264,684
16. Claims Paid	296,576,723		1,393,350	297,970,073
<b>E. Net Incurred Claims and Cost Containment Expenses:</b>				
17. Incurred Claims and Cost Containment Expenses .....	282,191,431		1,478,080	283,669,511
18. Beginning Reserves and Liabilities .....	113,307,104		1,288,459	114,595,563
19. Ending Reserves and Liabilities .....	98,891,495		1,373,189	100,264,684
20. Paid Claims and Cost Containment Expenses	296,607,040		1,393,350	298,000,390

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

**SCHEDULE S - PART 1 - SECTION 1**

Reinsurance Assumed Life Insurance, Annuities, Deposit Funds and Other Liabilities Without Life or Disability Contingencies, and Related Benefits Listed by Reinsured Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Reinsured	5 Location	6 Type of Reinsurance Assumed	7 Amount of In Force at End of Year	8 Reserve	9 Premiums	10 Reinsurance Payable on Paid and Unpaid Losses	11 Modified Coinsurance Reserve	12 Funds Withheld Under Coinsurance
66168	41-0417830	06/01/1981	Minnesota Mutual Life Insurance Company	St. Paul, MN	OTH/G	6,867,532		51,058			
66109	35-0838945	06/10/1988	Midwestern United Life Insurance Company	Fort Wayne, IN	ACO/I		3,432,982	5,200			
82627	06-0839705	01/01/1994	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	19,593,000		117,944	64,376		
86231	39-0989781	12/01/2001	Transamerica Life Insurance Company	Cedar Rapids, IA	CO/I	173,409,873	72,806,886				72,806,886
0299999. General Account, Non-Affiliates						199,870,405	76,239,868	174,202	64,376		72,806,886
0399999. Total General Account						199,870,405	76,239,868	174,202	64,376		72,806,886
0699999. Total Separate Accounts											
0799999 - Totals						199,870,405	76,239,868	174,202	64,376		72,806,886



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

**SCHEDULE S - PART 1 - SECTION 2**

Reinsurance Assumed Accident and Health Insurance Listed by Reinsured Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Reinsured	5 Location	6 Type of Reinsurance Assumed	7 Premiums	8 Unearned Premiums	9 Reserve Liability Other Than for Unearned Premiums	10 Reinsurance Payable on Paid and Unpaid Losses	11 Modified Coinsurance Reserve	12 Funds Withheld Under Coinsurance
77828	57-0523959	01/01/2008	Companion Life Insurance Company	Columbia, SC	OTH/G	445,412			102,510		
0299999. Total - Non-Affiliates						445,412			102,510		
0399999 - Totals						445,412			102,510		

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

**SCHEDULE S - PART 2**

Reinsurance Recoverable on Paid and Unpaid Losses Listed by Reinsuring Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Company	5 Location	6 Paid Losses	7 Unpaid Losses
97071	13-3126819	01/01/2006	Generali USA Life Reassurance Company	Kansas City, MO		374,491
70815	06-0838648	01/01/2006	Hartford Life & Accident Insurance Co.	Hartford, CT	248,277	743,904
74780	86-0214103	07/01/1987	Integrity Life Insurance Company	Cincinnati, OH		424,761
65676	35-0472300	01/01/1984	Lincoln National Life Insurance Company	Fort Wayne, IN		48,549
93572	43-1235868	01/01/1998	RGA Reinsurance Company	St. Louis, MO		530,000
93572	43-1235868	06/01/1998	RGA Reinsurance Company	St. Louis, MO	80,000	275,000
93572	43-1235868	04/01/2002	RGA Reinsurance Company	St. Louis, MO	200,000	760,000
93572	43-1235868	07/01/2002	RGA Reinsurance Company	St. Louis, MO	155,230	80,000
93572	43-1235868	01/01/2006	RGA Reinsurance Company	St. Louis, MO	60,307	
93572	43-1235868	09/01/2008	RGA Reinsurance Company	St. Louis, MO		202,500
71706	57-0290111	06/22/1970	Standard Life and Casualty Insurance Co	Salt Lake City, UT	928	
82627	06-0839705	01/01/1990	Swiss Re Life & Health America, Inc.	Stamford, CT		2,742,456
82627	06-0839705	01/01/1994	Swiss Re Life & Health America, Inc.	Stamford, CT	69,706	374,491
82627	06-0839705	12/01/1995	Swiss Re Life & Health America, Inc.	Stamford, CT		71,464
82627	06-0839705	01/01/2006	Swiss Re Life & Health America, Inc.	Stamford, CT	17,231	
82627	06-0839705	09/01/2008	Swiss Re Life & Health America, Inc.	Stamford, CT		22,500
66133	41-1760577	01/19/2005	Wilton Reassurance Company	Minneapolis, MN	8,615	
0299999. Life and Annuity - Non-Affiliates					840,294	6,650,116
0399999. Totals - Life and Annuity					840,294	6,650,116
			American Disability Reins. Underwriters			
00000	AA-9995055	01/01/1999	Syndicate	Westbrook, ME		112,000
70815	06-0838648	01/01/2006	Hartford Life & Accident Insurance Co.	Hartford, CT		108,604
65676	35-0472300	01/01/1995	Lincoln National Life Insurance Company	Fort Wayne, IN	6,261	
88099	75-1608507	01/01/2008	Optimum Re Insurance Co	Dallas, TX		31,924
67105	41-0451140	01/01/2007	Reliastar Life Insurance Company	Minneapolis, MN	634,117	714,000
68721	41-0808596	04/01/2004	Security Life Insurance Company	Minnetonka, MN		204,931
70408	81-0170040	11/01/2005	Union Security Insurance Company	Topeka, KS		3,127
38776	13-2997499	10/01/2007	White Mountains Rein Co of America	New York, NY	264,502	725,331
0599999. Accident and Health - Non-Affiliates					904,880	1,899,917
0699999. Totals - Accident and Health					904,880	1,899,917
0799999 Totals - Life, Annuity and Accident and Health					1,745,174	8,550,033

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

**SCHEDULE S - PART 3 - SECTION 1**

Reinsurance Ceded Life Insurance, Annuities, Deposit Funds and Other Liabilities Without Life or Disability Contingencies, and Related Benefits Listed by Reinsuring Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Company	5 Location	6 Type of Reinsurance Ceded	7 Amount in Force at End of Year	8 Reserve Credit Taken		10 Premiums	11 Outstanding Surplus Relief		13 Modified Coinsurance Reserve	14 Funds Withheld Under Coinsurance
							8 Current Year	9 Prior Year		11 Current Year	12 Prior Year		
60348	22-1771521	01/01/2009	ACE TEMPEST LIFE RE USA	Stamford, CT	ADB/I				470				
60348	22-1771521	01/01/2009	ACE TEMPEST LIFE RE USA	Stamford, CT	YRT/I	113,788,299	199,286		253				
68365	04-2729166	07/01/1999	AXA Re Insurance Company Connecticut General Life Insurance Co (CIGNA)	Wilmington, DE	YRT/I			36,357	176,056				
62308	06-0303370	01/01/1995	General Re Life Corporation	Bloomfield, CT	YRT/I			1,523	17,456				
86258	13-2572994	12/01/1986	General Re Life Corporation	Stamford, CT	ADB/I				185				
86258	13-2572994	12/01/1986	General Re Life Corporation	Stamford, CT	DIS/I				243				
86258	13-2572994	12/01/1986	General Re Life Corporation	Stamford, CT	YRT/I	24,670,953	43,989	4,807	152,600				
86258	13-2572994	01/01/1989	General Re Life Corporation	Stamford, CT	YRT/I	113,264	185	167	2,498				
86258	13-2572994	06/01/2004	General Re Life Corporation	Stamford, CT	DIS/I				122				
86258	13-2572994	06/01/2004	General Re Life Corporation	Stamford, CT	YRT/I	174,409,695	360,159	388,982	265,353				
86258	13-2572994	01/01/2009	General Re Life Corporation	Stamford, CT	ADB/I				950				
86258	13-2572994	01/01/2009	General Re Life Corporation	Stamford, CT	YRT/I	114,238,317	205,723		253				
97071	13-3126819	04/01/1985	Generali USA Life Reassurance Company	Kansas City, MO	ADB/I				83				
97071	13-3126819	04/01/1985	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				1,978				
97071	13-3126819	04/01/1985	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	5,635,894	4,930	4,457	67,037				
97071	13-3126819	07/01/1986	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	320,024	193	402	3,076				
97071	13-3126819	01/01/1988	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	940,000	4,407	4,015	5,725				
97071	13-3126819	01/01/1989	Generali USA Life Reassurance Company	Kansas City, MO	CO/I	8,742,015	6,910	8,100	57,777				
97071	13-3126819	01/01/1989	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				207				
97071	13-3126819	01/01/1993	Generali USA Life Reassurance Company	Kansas City, MO	ADB/I				10				
97071	13-3126819	01/01/1993	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				591				
97071	13-3126819	01/01/1993	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	18,047,679	29,444	35,854	135,658				
97071	13-3126819	06/01/1996	Generali USA Life Reassurance Company	Kansas City, MO	ADB/I				62				
97071	13-3126819	06/01/1996	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				2,933				
97071	13-3126819	06/01/1996	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	42,272,206	30,605	34,247	141,826				
97071	13-3126819	01/01/1998	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				(770)				
97071	13-3126819	01/01/1998	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	93,421,226	238,876	243,546	182,464				
97071	13-3126819	03/01/2003	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				(85)				
97071	13-3126819	03/01/2003	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	47,503,974	129,357	115,238	124,924				
97071	13-3126819	01/01/2006	Generali USA Life Reassurance Company	Kansas City, MO	ADB/I				243				
97071	13-3126819	01/01/2006	Generali USA Life Reassurance Company	Kansas City, MO	CO/I	62,895,973	353,983	230,803	186,903				
97071	13-3126819	01/01/2006	Generali USA Life Reassurance Company	Kansas City, MO	DIS/I				762				
97071	13-3126819	01/01/2006	Generali USA Life Reassurance Company	Kansas City, MO	YRT/I	42,051	17		69				
70815	06-0838648	01/01/2006	Hartford Life and Accident Insurance Company	Hartford, CT	CO/G	2,295,519,282	146,267	62,960	4,609,609				
74780	86-0214103	07/01/1987	Integrity Life Insurance Company	Cincinnati, OH	MCO/I	25,913,985			263,730			611,253	
65676	35-0472300	01/01/1963	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	601,381			10,444				
65676	35-0472300	02/01/1982	Lincoln National Life Insurance Co.	Ft. Wayne, IN	DIS/I				187				
65676	35-0472300	02/01/1982	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	2,397,548	3,900	3,933	36,643				
65676	35-0472300	03/01/1983	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	100,000			1,104				
65676	35-0472300	01/01/1984	Lincoln National Life Insurance Co.	Ft. Wayne, IN	ACC/I		5,102,026	5,388,601	103,332				
65676	35-0472300	01/01/1984	Lincoln National Life Insurance Co.	Ft. Wayne, IN	ADB/I				2,228				
65676	35-0472300	01/01/1984	Lincoln National Life Insurance Co.	Ft. Wayne, IN	DIS/I				14,893				
65676	35-0472300	01/01/1984	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	161,112,092			1,117,868				
65676	35-0472300	10/31/1985	Lincoln National Life Insurance Co.	Ft. Wayne, IN	ADB/I				284				
65676	35-0472300	10/31/1985	Lincoln National Life Insurance Co.	Ft. Wayne, IN	CO/I	62,829,950	287,463	283,508	164,467				
65676	35-0472300	10/31/1985	Lincoln National Life Insurance Co.	Ft. Wayne, IN	DIS/I				399				
65676	35-0472300	01/01/1986	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	163,736			9,093				
65676	35-0472300	07/01/1998	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	14,612,500	33,444	14	104,665				
65676	35-0472300	01/01/2000	Lincoln National Life Insurance Co.	Ft. Wayne, IN	ADB/I				1,770				
65676	35-0472300	01/01/2000	Lincoln National Life Insurance Co.	Ft. Wayne, IN	CO/I	1,648,998,158	33,913,512	33,225,077	2,651,881				
65676	35-0472300	01/01/2000	Lincoln National Life Insurance Co.	Ft. Wayne, IN	DIS/I				20,181				
65676	35-0472300	01/01/2000	Lincoln National Life Insurance Co.	Ft. Wayne, IN	YRT/I	9,975,000			28,267				
66346	58-0828824	12/01/1988	Munich American Reassurance Company	Atlanta, GA	CO/I	1,972,996	2,688	4,499	17,636				
66346	58-0828824	12/01/1988	Munich American Reassurance Company	Atlanta, GA	DIS/I				482				

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

**SCHEDULE S - PART 3 - SECTION 1**

Reinsurance Ceded Life Insurance, Annuities, Deposit Funds and Other Liabilities Without Life or Disability Contingencies, and Related Benefits Listed by Reinsuring Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Company	5 Location	6 Type of Reinsurance Ceded	7 Amount in Force at End of Year	Reserve Credit Taken		10 Premiums	Outstanding Surplus Relief		13 Modified Coinsurance Reserve	14 Funds Withheld Under Coinsurance
							8 Current Year	9 Prior Year		11 Current Year	12 Prior Year		
66346	58-0828824	01/01/1998	Munich American Reassurance Company	Atlanta, GA	DIS/I				1,665				
66346	58-0828824	01/01/1998	Munich American Reassurance Company	Atlanta, GA	YRT/I	169,138,829	425,378	459,766	412,489				
66346	58-0828824	07/01/1999	Munich American Reassurance Company	Atlanta, GA	YRT/I			38,937	140,801				
66346	58-0828824	04/02/2007	Munich American Reassurance Company	Atlanta, GA	YRT/I	7,991			47				
93572	43-1235868	11/01/1988	RGA Reinsurance Company	St. Louis, MO	DIS/I				129				
93572	43-1235868	11/01/1988	RGA Reinsurance Company	St. Louis, MO	YRT/I	2,713,755	914	1,187	12,995				
93572	43-1235868	01/01/1990	RGA Reinsurance Company	St. Louis, MO	ADB/I				73				
93572	43-1235868	01/01/1990	RGA Reinsurance Company	St. Louis, MO	DIS/I				862				
93572	43-1235868	01/01/1990	RGA Reinsurance Company	St. Louis, MO	YRT/I	14,286,263	30,520	28,771	131,170				
93572	43-1235868	04/15/1996	RGA Reinsurance Company	St. Louis, MO	DIS/I				1,088				
93572	43-1235868	04/15/1996	RGA Reinsurance Company	St. Louis, MO	YRT/I	26,724,691	24,450	27,170	329,050				
93572	43-1235868	01/01/1998	RGA Reinsurance Company	St. Louis, MO	ADB/I				5,933				
93572	43-1235868	01/01/1998	RGA Reinsurance Company	St. Louis, MO	CO/I	3,393,645,346	53,514,903	52,409,212	7,403,458				
93572	43-1235868	01/01/1998	RGA Reinsurance Company	St. Louis, MO	DIS/I				56,173				
93572	43-1235868	01/01/1998	RGA Reinsurance Company	St. Louis, MO	YRT/I	4,842,283	659	605	41,971				
93572	43-1235868	06/01/1998	RGA Reinsurance Company	St. Louis, MO	ADB/I				688				
93572	43-1235868	06/01/1998	RGA Reinsurance Company	St. Louis, MO	CO/I	327,881,684	3,592,598	3,696,385	811,491				
93572	43-1235868	06/01/1998	RGA Reinsurance Company	St. Louis, MO	DIS/I				2,737				
93572	43-1235868	06/01/1998	RGA Reinsurance Company	St. Louis, MO	YRT/I	534,874	12	10	4,566				
93572	43-1235868	02/01/2002	RGA Reinsurance Company	St. Louis, MO	ADB/I				163				
93572	43-1235868	02/01/2002	RGA Reinsurance Company	St. Louis, MO	DIS/I				212				
93572	43-1235868	02/01/2002	RGA Reinsurance Company	St. Louis, MO	YRT/I	76,319,765	40,655	36,870	207,138				
93572	43-1235868	04/01/2002	RGA Reinsurance Company	St. Louis, MO	ADB/I				4,495				
93572	43-1235868	04/01/2002	RGA Reinsurance Company	St. Louis, MO	CO/I	7,433,105,487	130,066,726	119,086,230	14,001,027				
93572	43-1235868	04/01/2002	RGA Reinsurance Company	St. Louis, MO	DIS/I				65,757				
93572	43-1235868	04/01/2002	RGA Reinsurance Company	St. Louis, MO	YRT/I	8,893,018	1,530	1,367	28,328				
93572	43-1235868	07/01/2002	RGA Reinsurance Company	St. Louis, MO	CO/I	339,762,600	3,926,465	3,729,529	1,154,625				
93572	43-1235868	07/01/2002	RGA Reinsurance Company	St. Louis, MO	DIS/I				1,320				
93572	43-1235868	07/01/2002	RGA Reinsurance Company	St. Louis, MO	YRT/I	39,620	3	3	42				
93572	43-1235868	01/01/2006	RGA Reinsurance Company	St. Louis, MO	ADB/I				2,327				
93572	43-1235868	01/01/2006	RGA Reinsurance Company	St. Louis, MO	CO/I	2,602,276,735	13,980,025	9,779,089	4,958,487				
93572	43-1235868	01/01/2006	RGA Reinsurance Company	St. Louis, MO	DIS/I				15,516				
93572	43-1235868	01/01/2006	RGA Reinsurance Company	St. Louis, MO	YRT/I	1,604,073	154	112	1,837				
93572	43-1235868	09/01/2008	RGA Reinsurance Company	St. Louis, MO	ADB/I				1,116				
93572	43-1235868	09/01/2008	RGA Reinsurance Company	St. Louis, MO	YRT/I	779,554,800	882,338	63,484	59,003				
93572	43-1235868	01/01/2009	RGA Reinsurance Company	St. Louis, MO	ADB/I				472				
93572	43-1235868	01/01/2009	RGA Reinsurance Company	St. Louis, MO	YRT/I	119,098,555	216,647		445				
64688	75-6020048	03/01/2003	SCOR Life US Reinsurance Company	Piano, TX	YRT/I	3,980,000	7,846	7,262	5,350				
64688	75-6020048	09/01/2008	SCOR Life US Reinsurance Company	Piano, TX	ADB/I				33				
64688	75-6020048	09/01/2008	SCOR Life US Reinsurance Company	Piano, TX	YRT/I	57,645,095	61,179	4,644	2,364				
87572	23-2038295	01/01/2006	Scottish Re (U.S.), Inc.	Wilmington, DE	ADB/I				106				
87572	23-2038295	01/01/2006	Scottish Re (U.S.), Inc.	Wilmington, DE	CO/I	246,051,639	1,290,451	939,865	326,420				
87572	23-2038295	01/01/2006	Scottish Re (U.S.), Inc.	Wilmington, DE	DIS/I				1,083				
87572	23-2038295	01/01/2006	Scottish Re (U.S.), Inc.	Wilmington, DE	YRT/I	256,726	24	42	182				
68713	84-0499703	04/01/2002	Security Life of Denver Insurance Company	Denver, CO	ADB/I				901				
68713	84-0499703	04/01/2002	Security Life of Denver Insurance Company	Denver, CO	CO/I	1,406,118,620	22,108,153	20,575,301	2,048,012				
68713	84-0499703	04/01/2002	Security Life of Denver Insurance Company	Denver, CO	DIS/I				10,293				
68713	84-0499703	04/01/2002	Security Life of Denver Insurance Company	Denver, CO	YRT/I	4,453,059	685	644	7,949				
68713	84-0499703	09/01/2002	Security Life of Denver Insurance Company	Denver, CO	YRT/I	3,601,049	1,679	1,613	16,871				
82627	06-0839705	12/01/1971	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	182,290							
82627	06-0839705	05/01/1974	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I		397		137				
82627	06-0839705	06/25/1979	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	245,625	3,357	3,443	5,497				
82627	06-0839705	01/01/1980	Swiss Re Life & Health America, Inc.	Stamford, CT	CO/I	334,000	5,104	5,671	7,465				
82627	06-0839705	07/01/1980	Swiss Re Life & Health America, Inc.	Stamford, CT	CO/I	399,000	10,092		9,251				
82627	06-0839705	07/01/1980	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	27,750	542	496	724				
82627	06-0839705	02/01/1982	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				61				

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

**SCHEDULE S - PART 3 - SECTION 1**

Reinsurance Ceded Life Insurance, Annuities, Deposit Funds and Other Liabilities Without Life or Disability Contingencies, and Related Benefits Listed by Reinsuring Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Company	5 Location	6 Type of Reinsurance Ceded	7 Amount in Force at End of Year	Reserve Credit Taken		10 Premiums	Outstanding Surplus Relief		13 Modified Coinsurance Reserve	14 Funds Withheld Under Coinsurance
							8 Current Year	9 Prior Year		11 Current Year	12 Prior Year		
82627	06-0839705	02/01/1982	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	846,290	1,398	2,191	17,514				
82627	06-0839705	07/01/1984	Swiss Re Life & Health America, Inc.	Stamford, CT	ADB/I				246				
82627	06-0839705	07/01/1984	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				3,432				
82627	06-0839705	07/01/1984	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	27,425,978	19,445	20,759	221,398				
82627	06-0839705	01/01/1985	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	1,276,375	2,170	2,186	30,054				
82627	06-0839705	04/01/1985	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				1,938				
82627	06-0839705	04/01/1985	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	5,503,263	20,610	20,709	54,570				
82627	06-0839705	07/01/1986	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				380				
82627	06-0839705	07/01/1986	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	4,707,724	7,104	7,288	50,339				
82627	06-0839705	01/01/1987	Swiss Re Life & Health America, Inc.	Stamford, CT	ADB/I				30				
82627	06-0839705	01/01/1987	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	1,088,862	6,951	9,237	20,062				
82627	06-0839705	01/01/1990	Swiss Re Life & Health America, Inc.	Stamford, CT	ADB/I				580				
82627	06-0839705	01/01/1990	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				15,477				
82627	06-0839705	01/01/1990	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	298,639,390	640,978	706,503	1,529,908				
82627	06-0839705	01/01/1994	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	51,331,161			120,472				
82627	06-0839705	04/01/1995	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I				847				
82627	06-0839705	12/01/1995	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	447,979,354			1,753,595				
82627	06-0839705	07/01/1996	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I			2,379	29,349				
82627	06-0839705	01/01/2002	Swiss Re Life & Health America, Inc.	Stamford, CT	CAT/G				15,000				
82627	06-0839705	03/01/2002	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				286				
82627	06-0839705	03/01/2002	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	46,033,858	27,198	24,846	296,840				
82627	06-0839705	07/01/2003	Swiss Re Life & Health America, Inc.	Stamford, CT	CAT/I				19,500				
82627	06-0839705	01/01/2006	Swiss Re Life & Health America, Inc.	Stamford, CT	ADB/I				476				
82627	06-0839705	01/01/2006	Swiss Re Life & Health America, Inc.	Stamford, CT	CO/I	150,428,097	960,189	597,549	396,399				
82627	06-0839705	01/01/2006	Swiss Re Life & Health America, Inc.	Stamford, CT	DIS/I				1,348				
82627	06-0839705	04/01/2007	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	1,814,410			30,950				
82627	06-0839705	11/01/2007	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	16,681,551			20,309				
82627	06-0839705	09/01/2008	Swiss Re Life & Health America, Inc.	Stamford, CT	ADB/I				129				
82627	06-0839705	09/01/2008	Swiss Re Life & Health America, Inc.	Stamford, CT	YRT/I	94,932,377	117,690	7,320	12,619				
86231	39-0989781	01/01/1980	Transamerica Life Insurance Company	Cedar Rapids, IA	CO/I	112,500	1,986	1,814	15,987				
86231	39-0989781	01/01/1980	Transamerica Life Insurance Company	Cedar Rapids, IA	YRT/I	97,513	3,870	3,618	19,550				
86231	39-0989781	02/01/1982	Transamerica Life Insurance Company	Cedar Rapids, IA	YRT/I	1,125,922	1,584	1,440	17,518				
66133	41-1760577	01/19/2005	Wilton Reassurance Company	Minneapolis, MN	ADB/I				1,112				
66133	41-1760577	01/19/2005	Wilton Reassurance Company	Minneapolis, MN	CO/I	1,109,710,409	8,774,984	6,958,661	1,754,808				
66133	41-1760577	01/19/2005	Wilton Reassurance Company	Minneapolis, MN	DIS/I				8,318				
66133	41-1760577	01/19/2005	Wilton Reassurance Company	Minneapolis, MN	YRT/I	1,550,447	167	125	2,539				
0299999. Authorized General Account, Non-Affiliates						24,216,255,003	281,877,174	259,350,674	49,454,174			611,253	
0399999. Total Authorized General Account						24,216,255,003	281,877,174	259,350,674	49,454,174			611,253	
00000	AA-3194154	05/01/2003	Ace Tempest Life Reinsurance Standard Life and Casualty Insurance Company	Hamilton, Bermuda Salt Lake City, UT	YRT/I			47,269	411,134				
71706	57-0290111	06/22/1970	Company		YRT/I	209,409			7,044				
0599999. Unauthorized General Account, Non-Affiliates						209,409		47,269	418,178				
0699999. Total Unauthorized General Account						209,409		47,269	418,178				
0799999. Total Authorized and Unauthorized General Account						24,216,464,412	281,877,174	259,397,943	49,872,352			611,253	
1099999. Total Authorized Separate Accounts													
1399999. Total Unauthorized Separate Accounts													
1499999. Total Authorized and Unauthorized Separate Accounts													
1599999 - Totals						24,216,464,412	281,877,174	259,397,943	49,872,352			611,253	

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

**SCHEDULE S - PART 3 - SECTION 2**

Reinsurance Ceded Accident and Health Insurance Listed by Reinsuring Company as of December 31, Current Year

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Company	5 Location	6 Type	7 Premiums	8 Unearned Premiums (Estimated)	9 Reserve Credit Taken Other than for Unearned Premiums	Outstanding Surplus Relief		12 Modified Coinsurance Reserve	13 Funds Withheld Under Coinsurance
									10 Current Year	11 Prior Year		
00000	AA-9995055	01/01/1999	American Disability Reinsurance Underwriters Syndicate (ADRUS)	Westbrook, ME	CO/G	3,818,651		58,231,409				
88072	06-0974148	01/01/2006	Hartford Life Insurance Company	Hartford, CT	CO/G	589,156						
65676	35-0472300	10/05/1987	Lincoln National Life Insurance Company	Fort Wayne, IN	CO/G	7,586						
65676	35-0472300	01/01/1995	Lincoln National Life Insurance Company	Fort Wayne, IN	OTH/I	56,959		710,199				
88099	75-1608507	01/01/2008	Optimum Reinsurance Insurance Company	Dallas, TX	CO/G	30,231						
67105	41-0451140	01/01/2009	Reliastar Life Insurance Company	Minneapolis, MN	OTH/G	3,914,014						
68721	41-0808596	04/01/2004	Security Life Insurance Company of America	Minnetonka, MN	OTH/G	1,594,366						
70408	81-0170040	11/01/2005	Union Security Insurance Company	Topeka, KS	CO/G	39,506						
38776	13-2997499	10/01/2007	White Mountains Reinsurance Company of America	New York, NY	CO/G	2,459,625		9,012				
0299999. Authorized General Account, Non-Affiliates						12,510,094		58,950,620				
0399999. Total Authorized General Account						12,510,094		58,950,620				
11985	20-0735099	01/01/2008	Companion Captive Insurance Company	Columbia, SC	OTH/G	93,830						
0599999. Unauthorized General Account, Non-Affiliates						93,830						
0699999. Total Unauthorized General Account						93,830						
0799999. Total Authorized and Unauthorized General Account						12,603,924		58,950,620				
1099999. Total Authorized Separate Accounts												
1399999. Total Unauthorized Separate Accounts												
1499999. Total Authorized and Unauthorized Separate Accounts												
1599999 - Totals						12,603,924		58,950,620				

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

**SCHEDULE S - PART 4**

Reinsurance Ceded to Unauthorized Companies

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Reinsurer	5 Reserve Credit Taken	6 Paid and Unpaid Losses Recoverable (Debit)	7 Other Debits	8 Total Cols. (5 + 6 + 7)	9 Letters of Credit	10 Trust Agreements	11 Funds Deposited by and Withheld from Reinsurers	12 Other	13 Miscellaneous Balances (Credit)	14 Sum of Cols. 9+10+11+12+13 but not in Excess of Col. 8
<b>NONE</b>													
1199999 - Total													

## ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company

**SCHEDULE S - PART 5**Five Year Exhibit of Reinsurance Ceded Business  
(000 OMITTED)

	1 2009	2 2008	3 2007	4 2006	5 2005
<b>A. OPERATIONS ITEMS</b>					
1. Premiums and annuity considerations for life and accident and health contracts .....	62,476	69,251	61,227	58,609	65,096
2. Commissions and reinsurance expense allowances .....	9,835	12,994	11,704	9,537	10,276
3. Contract claims .....	47,052	42,117	42,679	23,385	23,037
4. Surrender benefits and withdrawals for life contracts .....	392	689	706	695	942
5. Dividends to policyholders .....					
6. Reserve adjustments on reinsurance ceded .....	24	24	26	22	28
7. Increase in aggregate reserve for life and accident and health contracts .....	18,708	26,439	22,646	23,075	35,234
<b>B. BALANCE SHEET ITEMS</b>					
8. Premiums and annuity considerations for life and accident and health contracts deferred and uncollected .....	6,810	7,369	6,693	2,461	4,628
9. Aggregate reserves for life and accident and health contracts .....	340,568	321,860	295,421	272,775	249,700
10. Liability for deposit-type contracts .....	214	337	423	507	
11. Contract claims unpaid .....	8,550	5,080	5,878	5,259	3,274
12. Amounts recoverable on reinsurance .....	1,745	2,169	4,872	1,405	4,053
13. Experience rating refunds due or unpaid .....	1,325	1,582	240	233	230
14. Policyholders' dividends (not included in Line 10) .....					
15. Commissions and reinsurance expense allowances unpaid .....			1,199	320	1,343
16. Unauthorized reinsurance offset .....		47			
<b>C. UNAUTHORIZED REINSURANCE (DEPOSITS BY AND FUNDS WITHHELD FROM)</b>					
17. Funds deposited by and withheld from (F) .....		393			
18. Letters of credit (L) .....			1	1	1
19. Trust agreements (T) .....					
20. Other (O) .....					



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

**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)
<b>ASSETS (Page 2, Col. 3)</b>			
1. Cash and invested assets (Line 10) .....	16,203,267,871		16,203,267,871
2. Reinsurance (Line 14) .....	75,876,880	(75,876,880)	
3. Premiums and considerations (Line 13) .....	65,001,123	6,810,204	71,811,327
4. Net credit for ceded reinsurance .....	XXX	418,399,463	418,399,463
5. All other admitted assets (balance) .....	333,491,321		333,491,321
6. Total assets excluding Separate Accounts (Line 24) .....	16,677,637,195	349,332,787	17,026,969,982
7. Separate Account assets (Line 25) .....	4,121,446,909		4,121,446,909
8. Total assets (Line 26) .....	20,799,084,104	349,332,787	21,148,416,891
<b>LIABILITIES, CAPITAL AND SURPLUS (Page 3)</b>			
9. Contract reserves (Lines 1 and 2) .....	12,268,990,308	340,568,321	12,609,558,629
10. Liability for deposit-type contracts (Line 3) .....	2,308,884,223	214,433	2,309,098,656
11. Claim reserves (Line 4) .....	114,040,050	8,550,033	122,590,083
12. Policyholder dividends/reserves (Lines 5 through 7) .....	4,633		4,633
13. Premium & annuity considerations received in advance (Line 8) .....	2,090,469		2,090,469
14. Other contract liabilities (Line 9) .....	240,304,581		240,304,581
15. Reinsurance in unauthorized companies (Line 24.2) .....			
16. Funds held under reinsurance treaties with unauthorized reinsurers (Line 24.3) .....			
17. All other liabilities (balance) .....	327,887,825		327,887,825
18. Total liabilities excluding Separate Accounts (Line 26) .....	15,262,202,090	349,332,787	15,611,534,877
19. Separate Account liabilities (Line 27) .....	4,121,446,909		4,121,446,909
20. Total liabilities (Line 28) .....	19,383,648,999	349,332,787	19,732,981,786
21. Capital & surplus (Line 38) .....	1,415,435,105	XXX	1,415,435,105
22. Total liabilities, capital & surplus (Line 39) .....	20,799,084,104	349,332,787	21,148,416,891
<b>NET CREDIT FOR CEDED REINSURANCE</b>			
23. Contract reserves .....	340,568,321		
24. Claim reserves .....	8,550,033		
25. Policyholder dividends/reserves .....			
26. Premium & annuity considerations received in advance .....			
27. Liability for deposit-type contracts .....	214,433		
28. Other contract liabilities .....			
29. Reinsurance ceded assets .....	75,876,880		
30. Other ceded reinsurance recoverables .....			
31. Total ceded reinsurance recoverables .....	425,209,667		
32. Premiums and considerations .....	6,810,204		
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 .....	6,810,204		
37. Total net credit for ceded reinsurance .....	418,399,463		

**ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company**  
**SCHEDULE T - PREMIUMS AND ANNUITY CONSIDERATIONS**

Allocated by States and Territories

States, Etc.	1	Direct Business Only					
		Life Contracts		4 Accident and Health Insurance Premiums, Including Policy, Membership and Other Fees	5 Other Considerations	6 Total Columns 2 through 5	7 Deposit-Type Contracts
		2 Life Insurance Premiums	3 Annuity Considerations				
1. Alabama	AL	L	2,582,619	71,361,036	2,224,630	76,168,285	642,736
2. Alaska	AK	L	1,891,254	4,085,726	16,456,759	22,433,739	604,891
3. Arizona	AZ	L	2,171,488	30,886,800	24,971,995	58,030,283	3,586,212
4. Arkansas	AR	L	1,625,535	43,321,896	2,605,392	47,552,823	414,384
5. California	CA	L	20,169,861	645,935,885	49,932,629	716,038,375	11,850,481
6. Colorado	CO	L	3,458,724	48,042,699	3,069,477	54,570,900	12,465,177
7. Connecticut	CT	L	2,625,084	21,168,939	4,692,998	28,487,021	1,092,626
8. Delaware	DE	L	73,357	496,297	279,623	849,277	87,713
9. District of Columbia	DC	L	85,407	1,286,146	1,432,618	2,804,171	42,965
10. Florida	FL	L	11,786,267	137,944,102	44,952,286	194,682,655	10,479,067
11. Georgia	GA	L	3,758,743	30,744,804	6,503,371	41,006,918	1,217,389
12. Hawaii	HI	L	1,538,778	20,369,403	34,284	21,942,465	110,231
13. Idaho	ID	L	2,364,556	18,924,481	1,630,186	22,919,223	976,086
14. Illinois	IL	L	9,260,593	99,902,820	20,067,011	129,230,424	2,233,649
15. Indiana	IN	L	5,940,987	38,668,963	11,848,718	56,458,668	2,172,509
16. Iowa	IA	L	1,222,707	15,636,886	4,585,708	21,445,301	2,698,094
17. Kansas	KS	L	2,076,534	5,421,504	861,750	8,359,788	43,626
18. Kentucky	KY	L	2,198,064	27,053,222	4,820,261	34,071,547	2,442,051
19. Louisiana	LA	L	3,730,530	34,469,927	3,009,933	41,210,390	1,289,135
20. Maine	ME	L	147,717	3,055,950	1,136,612	4,340,279	708,046
21. Maryland	MD	L	1,316,605	7,435,498	12,683,820	21,435,923	96,227
22. Massachusetts	MA	L	369,639	14,353,936	16,117,674	30,841,249	1,426,431
23. Michigan	MI	L	4,063,186	46,420,932	16,792,357	67,276,475	322,260
24. Minnesota	MN	L	2,408,176	22,032,109	2,124,046	26,564,331	356,400
25. Mississippi	MS	L	2,453,013	21,663,789	1,931,288	26,048,090	615,900
26. Missouri	MO	L	5,025,206	41,683,028	4,408,932	51,117,166	339,510
27. Montana	MT	L	3,272,195	4,336,469	8,233,448	15,842,112	630,416
28. Nebraska	NE	L	868,783	14,017,872	2,660,113	17,546,768	379,518
29. Nevada	NV	L	1,146,640	10,225,375	1,413,182	12,785,197	523,803
30. New Hampshire	NH	L	141,166	1,020,403	1,980,049	3,141,618	119,909
31. New Jersey	NJ	L	462,577	31,427,202	22,272,490	54,162,269	807,769
32. New Mexico	NM	L	1,298,368	6,057,255	1,779,435	9,135,058	1,470,143
33. New York	NY	N	213,992	1,192,728	1,609,351	3,016,071	
34. North Carolina	NC	L	1,591,628	37,848,344	17,007,871	56,447,843	343,282
35. North Dakota	ND	L	495,040	4,692,974	37,088	5,225,102	
36. Ohio	OH	L	6,037,814	108,452,251	8,724,546	123,214,611	3,858,461
37. Oklahoma	OK	L	1,727,999	30,472,858	1,183,716	33,384,573	1,558,816
38. Oregon	OR	L	9,188,110	61,853,449	11,015,880	82,057,439	2,727,215
39. Pennsylvania	PA	L	2,747,316	34,051,226	14,391,206	51,189,748	453,400
40. Rhode Island	RI	L	261,080	648,568	644,337	1,553,985	172,876
41. South Carolina	SC	L	1,598,486	14,369,387	1,930,894	17,898,767	239,306
42. South Dakota	SD	L	748,558	5,526,301	150,054	6,424,913	614,137
43. Tennessee	TN	L	23,976,654	71,389,703	12,358,565	107,724,922	568,777
44. Texas	TX	L	8,525,933	152,860,763	18,551,802	179,938,498	13,032,221
45. Utah	UT	L	1,564,668	9,721,744	3,863,015	15,149,427	352,992
46. Vermont	VT	L	35,892	628,653	168,918	833,463	
47. Virginia	VA	L	1,289,031	20,909,665	6,660,357	28,859,053	924,198
48. Washington	WA	L	20,758,667	155,676,532	22,905,341	199,340,540	19,239,399
49. West Virginia	WV	L	537,215	16,681,600	970,842	18,189,657	194,500
50. Wisconsin	WI	L	6,824,384	18,418,633	5,445,215	30,688,232	321,753
51. Wyoming	WY	L	1,055,505	7,857,284	2,447,257	11,360,046	72,500
52. American Samoa	AS	N					
53. Guam	GU	N	2,754	6,320		9,074	
54. Puerto Rico	PR	N	957	200,000		200,957	
55. U.S. Virgin Islands	VI	N	7,325			7,325	
56. Northern Mariana Islands	MP	N					
57. Canada	CN	N	51,971			51,971	
58. Aggregate Other Aliens	OT	XXX	94,134		59,037	153,171	
59. Subtotal	(a)	50	190,869,472	2,272,910,337	427,638,367	2,891,418,176	106,919,186
90. Reporting entity contributions for employee benefits plans	XXX						
91. Dividends or refunds applied to purchase paid-up additions and annuities	XXX		454			454	
92. Dividends or refunds applied to shorten endowment or premium paying period	XXX						
93. Premium or annuity considerations waived under disability or other contract provisions	XXX		361,555		32,257	393,812	
94. Aggregate or other amounts not allocable by State	XXX						
95. Totals (Direct Business)	XXX		191,231,481	2,272,910,337	427,670,624	2,891,812,442	106,919,186
96. Plus reinsurance assumed	XXX		180,188	5,200	432,217	617,605	
97. Totals (All Business)	XXX		191,411,669	2,272,915,537	428,102,841	2,892,430,047	106,919,186
98. Less reinsurance ceded	XXX		49,742,939	875,722	12,416,751	63,035,412	
99. Totals (All Business) less Reinsurance Ceded	XXX		141,668,730	2,272,039,815	(b) 415,686,090	2,829,394,635	106,919,186
<b>DETAILS OF WRITE-INS</b>							
5801. Alien (1)	XXX		94,134		59,037	153,171	
5802.	XXX						
5803.	XXX						
5898. Summary of remaining write-ins for Line 58 from overflow page	XXX						
5899. Totals (Lines 5801 through 5803 plus 5898)(Line 58 above)	XXX		94,134		59,037	153,171	
9401.	XXX						
9402.	XXX						
9403.	XXX						
9498. Summary of remaining write-ins for Line 94 from overflow page	XXX						
9499. Totals (Lines 9401 through 9403 plus 9498)(Line 94 above)	XXX						

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

Ordinary Life and Annuity Considerations are allocated based on billing address of policyholder. Group annuity considerations are allocated based on mailing address of policyholder except for TSA considerations which are allocated based on mailing address of certificate holder. Group premiums are allocated as follows: a) For groups with less than 500 lives, allocation is based on state in which business or group in whose the name of insurance is written resides; b) For groups of 500 or more lives, allocation is based on state of residence of individual lives. BOLI premium allocated based on mailing address of policyholder except for Texas residents which are reported to Texas.

(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...

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

**SCHEDULE T - PART 2**  
**INTERSTATE COMPACT - EXHIBIT OF PREMIUMS WRITTEN**

Allocated by States and Territories

			Direct Business Only				6	
			1	2	3	4		5
States, Etc.			Life (Group and Individual)	Annuities (Group and Individual)	Disability Income (Group and Individual)	Long-Term Care (Group and Individual)	Deposit-Type Contracts	Totals
1. Alabama	AL		2,582,619	71,361,036	221,145		642,736	74,807,536
2. Alaska	AK		1,891,254	4,085,726	273		604,891	6,582,144
3. Arizona	AZ		2,171,488	30,886,800	13,482		3,586,212	36,657,982
4. Arkansas	AR		1,625,535	43,321,896	123,399		414,384	45,485,214
5. California	CA		20,169,861	645,935,885	192,533		11,850,481	678,148,760
6. Colorado	CO		3,458,724	48,042,699	72,016		12,465,177	64,038,616
7. Connecticut	CT		2,625,084	21,168,939	71,055		1,092,626	24,957,704
8. Delaware	DE		73,357	496,297			87,713	657,367
9. District of Columbia	DC		85,407	1,286,146	941		42,965	1,415,459
10. Florida	FL		11,786,267	137,944,102	133,015		10,479,067	160,342,451
11. Georgia	GA		3,758,743	30,744,804	283,292		1,217,389	36,004,228
12. Hawaii	HI		1,538,778	20,369,403			110,231	22,018,412
13. Idaho	ID		2,364,556	18,924,481	114,374		976,086	22,379,497
14. Illinois	IL		9,260,593	99,902,820	175,571		2,233,649	111,572,633
15. Indiana	IN		5,940,987	38,668,963	132,979		2,172,509	46,915,438
16. Iowa	IA		1,222,707	15,636,886	52,476		2,698,094	19,610,163
17. Kansas	KS		2,076,534	5,421,504	17,116		43,626	7,558,780
18. Kentucky	KY		2,198,064	27,053,222	70,112		2,442,051	31,763,449
19. Louisiana	LA		3,730,530	34,469,927	26,376		1,289,135	39,515,968
20. Maine	ME		147,717	3,055,950	2,646		708,046	3,914,359
21. Maryland	MD		1,316,605	7,435,498	149,603		96,227	8,997,933
22. Massachusetts	MA		369,639	14,353,936	84,524		1,426,431	16,234,530
23. Michigan	MI		4,063,186	46,420,932	469,442		322,260	51,275,820
24. Minnesota	MN		2,408,176	22,032,109	283,437		356,400	25,080,122
25. Mississippi	MS		2,453,013	21,663,789	17,706		615,900	24,750,408
26. Missouri	MO		5,025,206	41,683,028	60,614		339,510	47,108,358
27. Montana	MT		3,272,195	4,336,469	28,936		630,416	8,268,016
28. Nebraska	NE		868,783	14,017,872	98,605		379,518	15,364,778
29. Nevada	NV		1,146,640	10,225,375	26,937		523,803	11,922,755
30. New Hampshire	NH		141,166	1,020,403	32,036		119,909	1,313,514
31. New Jersey	NJ		462,577	31,427,202	728		807,769	32,698,276
32. New Mexico	NM		1,298,368	6,057,255	20,028		1,470,143	8,845,794
33. New York	NY		213,992	1,192,728	698			1,407,418
34. North Carolina	NC		1,591,628	37,848,344	754,548		343,282	40,537,802
35. North Dakota	ND		495,040	4,692,974	899			5,188,913
36. Ohio	OH		6,037,814	108,452,251	81,734		3,858,461	118,430,260
37. Oklahoma	OK		1,727,999	30,472,858	13,267		1,558,816	33,772,940
38. Oregon	OR		9,188,110	61,853,449	226,454		2,727,215	73,995,228
39. Pennsylvania	PA		2,747,316	34,051,226	133,405		453,400	37,385,347
40. Rhode Island	RI		261,080	648,568	135,599		172,876	1,218,123
41. South Carolina	SC		1,598,486	14,369,387	91,295		239,306	16,298,474
42. South Dakota	SD		748,558	5,526,301	10,542		614,137	6,899,538
43. Tennessee	TN		23,976,654	71,389,703	520,764		568,777	96,455,898
44. Texas	TX		8,525,933	152,860,763	104,018		13,032,221	174,522,935
45. Utah	UT		1,564,668	9,721,744	21,485		352,992	11,660,889
46. Vermont	VT		35,892	628,653	57			664,602
47. Virginia	VA		1,289,031	20,909,665	168,588		924,198	23,291,482
48. Washington	WA		20,758,667	155,676,532	304,217		19,239,399	195,978,815
49. West Virginia	WV		537,215	16,681,600	18,367		194,500	17,431,682
50. Wisconsin	WI		6,824,384	18,418,633	68,072		321,753	25,632,842
51. Wyoming	WY		1,055,505	7,857,284	38,872		72,500	9,024,161
52. American Samoa	AS							
53. Guam	GU		2,754	6,320				9,074
54. Puerto Rico	PR		957	200,000				200,957
55. U.S. Virgin Islands	VI		7,325					7,325
56. Northern Mariana Islands	MP							
57. Canada	CN		51,971					51,971
58. Aggregate Other Alien	OT		94,134					94,134
59. Total			190,869,472	2,272,910,337	5,668,278		106,919,186	2,576,367,273

**SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP**

**PART 1 - ORGANIZATIONAL CHART**

Name	FEI #	NAIC #	Domicile	Ownership
Symetra Financial Corporation	20-0978027		DE	18.8% White Mountains Insurance Group, Ltd.,* 18.8% Berkshire Hathaway, Inc., 11.7% Franklin Mutual Advisors, LLC, 50.7% Other Equity Investors **
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 Services Corporation	91-0887019		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

\*\* No Equity Investor owns 10% or more.

All named entities are corporations

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

**SCHEDULE Y**

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

1	2	3	4	5	6	7	8	9	10	11	12	13
NAIC Company Code	Federal ID Number	Names of Insurers and Parent, Subsidiaries or Affiliates	Shareholder Dividends	Capital Contributions	Purchases, Sales or Exchanges of Loans, Securities, Real Estate, Mortgage Loans or Other Investments	Income/ (Disbursements) Incurred in Connection with Guarantees or Undertakings for the Benefit of any Affiliate(s)	Management Agreements and Service Contracts	Income/ (Disbursements) Incurred Under Reinsurance Agreements	*	Any Other Material Activity Not in the Ordinary Course of the Insurer's Business	Totals	Reinsurance Recoverable/ (Payable) on Losses and/or Reserve Credit Taken/(Liability)
	20-0978027	Symetra Financial Corporation		(102,068,265)							(102,068,265)	
68608	91-0742147	Symetra Life Insurance Company	1,000,000	82,068,265							83,068,265	
90581	91-1079693	Symetra National Life Insurance Company	(1,000,000)								(1,000,000)	
78417	91-1367496	First Symetra National Life Insurance Company of New York		20,000,000							20,000,000	
	91-1246870	Symetra Assigned Benefits Service Company										
	91-1364981	Symetra Administrative Services, Inc										
	91-0824835	Symetra Securities, Inc.										
	91-0887019	Symetra Services Corporation										
	91-1354455	Symetra Investment Services, Inc.										
	20-3494693	TFS Training & Consulting, Inc.										
	20-3820455	Clearscape Funding Corporation										
	26-1099574	WSF Receivables I, LLC										
	20-8947838	Health Network Strategies, LLC										
	51-0309072	Medical Risk Managers, Inc.										
	26-3530060	TIF Invest III, LLC										
9999999	Control 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.

	<u>Responses</u>
<b>MARCH FILING</b>	
1. 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
<b>APRIL FILING</b>	
5. 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
<b>JUNE FILING</b>	
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

The following 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 type of business for which 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 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.

<b>MARCH FILING</b>	
11. Will Schedule SIS (Stockholder Information Supplement) be filed with the state of domicile by March 1? .....	NO
12. Will the Medicare Supplement Insurance Experience Exhibit be filed with the state of domicile and the NAIC by March 1? .....	NO
13. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC by March 1? .....	NO
14. Will the actuarial opinion on participating and non-participating policies as required in Interrogatories 1 and 2 to Exhibit 5 be filed by March 1? .....	YES
15. Will the actuarial opinion on non-guaranteed elements as required in interrogatory #3 to Exhibit 5 be filed by March 1? .....	YES
16. Will the actuarial opinion on X-Factors be filed with the state of domicile and electronically with the NAIC by March 1? .....	YES
17. 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? .....	YES
18. 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
19. 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
20. 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? .....	YES
21. 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
22. 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
23. 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
24. 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? .....	YES
25. 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? .....	YES
26. Will the Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO














# SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

- |                     |   |     |
|---------------------|---|-----|
| 27.                 | Will the Worker's Compensation Carve-Out Supplement be filed by March 1? .....  | NO  |
| 28.                 | Will Supplemental Schedule O be filed with the state of domicile and the NAIC by March 1? .....                                     | YES |
| 29.                 | Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC by March 1? .....                     | NO  |
| <b>APRIL FILING</b> |   |     |
| 30.                 | Will the Long-Term Care Experience Reporting Forms be filed with the state of domicile and the NAIC by April 1? .....               | NO  |
| 31.                 | Will the Interest-Sensitive Life Insurance Products Report Forms be filed with the state of domicile and the NAIC by April 1? ..... | YES |
| 32.                 | Will the Credit Insurance Experience Exhibit be filed with the state of domicile and the NAIC by April 1? .....                     | NO  |
| 33.                 | Will the Accident and Health Policy Experience Exhibit be filed by April 1? .....   | YES |

Explanations:

- 11.
- 12.
- 13.
- 18.
- 19.
- 21.
- 22.
- 23.
- 26.
- 27.
- 29.
- 30.
- 32.

Bar Codes:

- |     |  |  |
|-----|--|--|
| 11. | SIS Stockholder Information Supplement [Document Identifier 420]   |    |
| 12. | Medicare Supplement Insurance Experience Exhibit [Document Identifier 360]   |    |
| 13. | Trusted Surplus Statement [Document Identifier 490]  |    |
| 18. | Actuarial Opinion on Synthetic Guaranteed Investment Contracts [Document Identifier 444]   |    |
| 19. | Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 445]   |    |
| 21. | Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI [Document Identifier 447]     |   |
| 22. | Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI [Document Identifier 448]                        |  |
| 23. | Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) [Document Identifier 449] |  |
| 26. | Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities [Document Identifier 452]                |  |
| 27. | Workers' Compensation Carve-Out Supplement [Document Identifier 495]   |  |
| 29. | Medicare Part D Coverage Supplement [Document Identifier 365]  |  |
| 30. | Long-Term Care Experience Reporting Forms [Document Identifier 306]  |  |
| 32. | Credit Insurance Experience Exhibit [Document Identifier 230]  |  |

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

**OVERFLOW PAGE FOR WRITE-INS**

Additional Write-ins for Assets Line 23

	Current Year			Prior Year
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
2304. Other Assets .....	3,279,007	3,279,007		
2305. Leasehold Improvements .....	28,067	28,067		
2397. Summary of remaining write-ins for Line 23 from overflow page	3,307,074	3,307,074		

Additional Write-ins for Liabilities Line 25

	1 Current Year	2 Prior Year
2504. Accrued interest on policy claims .....	450,520	323,249
2505. Founders' premium benefit certificates .....	3,442	4,192
2597. Summary of remaining write-ins for Line 25 from overflow page	453,962	327,441

Additional Write-ins for Exhibit of Net Investment Income Line 9

	1 Collected During Year	2 Earned During Year
0904. FX -Gain/Loss .....	65,086	65,086
0905. Misc Securities Income .....	644,070	644,070
0906. Misc Investment Income .....	34,652	34,652
0997. Summary of remaining write-ins for Line 9 from overflow page	743,808	743,808

Additional Write-ins for Exhibit 2 Line 9.3

	Insurance			4 All Other Lines of Business	5 Investment	6 Total
	1	Accident and Health				
	Life	2 Cost Containment	3 All Other			
09.304. Amortization of Intangibles .....			2,570,000			2,570,000
09.397. Summary of remaining write-ins for Line 9.3 from overflow page			2,570,000			2,570,000

Additional Write-ins for Exhibit of Nonadmitted Assets Line 23

	1 Current Year Total Nonadmitted Assets	2 Prior Year Total Nonadmitted Assets	3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
2304. Leasehold improvements .....	28,067	55,538	27,471
2397. Summary of remaining write-ins for Line 23 from overflow page	28,067	55,538	27,471



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

**SUMMARY INVESTMENT SCHEDULE**

Investment Categories	Gross Investment Holdings		Admitted Assets as Reported in the Annual Statement	
	1 Amount	2 Percentage	3 Amount	4 Percentage
1. Bonds:				
1.1 U.S. treasury securities .....	10,462,674	0.065	10,462,674	0.065
1.2 U.S. government agency obligations (excluding mortgage-backed securities):				
1.21 Issued by U.S. government agencies .....	10,591,316	0.065	10,591,316	0.065
1.22 Issued by U.S. government sponsored agencies .....	14,089,109	0.087	14,089,109	0.087
1.3 Non-U.S. government (including Canada, excluding mortgaged-backed securities) .....	17,422,769	0.107	17,422,769	0.108
1.4 Securities issued by states, territories, and possessions and political subdivisions in the U.S. :				
1.41 States, territories and possessions general obligations .....	5,410,000	0.033	5,410,000	0.033
1.42 Political subdivisions of states, territories and possessions and political subdivisions general obligations .....	234,181,375	1.445	234,181,375	1.445
1.43 Revenue and assessment obligations .....	241,943,917	1.493	241,943,917	1.493
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:				
1.511 Issued or guaranteed by GNMA .....	328,358,491	2.026	328,358,491	2.026
1.512 Issued or guaranteed by FNMA and FHLMC .....	316,224,389	1.951	316,224,389	1.952
1.513 All other .....		0.000		0.000
1.52 CMOs and REMICs:				
1.521 Issued or guaranteed by GNMA, FNMA, FHLMC or VA .....	1,462,389,072	9.023	1,462,389,072	9.025
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 .....	1,482,822,019	9.149	1,482,822,019	9.151
1.523 All other .....		0.000		0.000
2. Other debt and other fixed income securities (excluding short-term):				
2.1 Unaffiliated domestic securities (includes credit tenant loans and hybrid securities) .....	8,928,082,945	55.084	8,928,082,945	55.101
2.2 Unaffiliated non-U.S. securities (including Canada) .....	1,428,132,946	8.811	1,428,132,946	8.814
2.3 Affiliated securities .....		0.000		0.000
3. Equity interests:				
3.1 Investments in mutual funds .....	613,717	0.004	613,717	0.004
3.2 Preferred stocks:				
3.21 Affiliated .....		0.000		0.000
3.22 Unaffiliated .....	63,178,944	0.390	63,178,944	0.390
3.3 Publicly traded equity securities (excluding preferred stocks):				
3.31 Affiliated .....	4,744,984	0.029	4,744,984	0.029
3.32 Unaffiliated .....	136,332,054	0.841	136,332,054	0.841
3.4 Other equity securities:				
3.41 Affiliated .....	72,253,372	0.446	72,253,372	0.446
3.42 Unaffiliated .....	12,960,001	0.080	12,960,001	0.080
3.5 Other equity interests including tangible personal property under lease:				
3.51 Affiliated .....		0.000		0.000
3.52 Unaffiliated .....		0.000		0.000
4. Mortgage loans:				
4.1 Construction and land development .....		0.000		0.000
4.2 Agricultural .....		0.000		0.000
4.3 Single family residential properties .....		0.000		0.000
4.4 Multifamily residential properties .....		0.000		0.000
4.5 Commercial loans .....	1,177,741,609	7.266	1,177,741,609	7.269
4.6 Mezzanine real estate loans .....		0.000		0.000
5. Real estate investments:				
5.1 Property occupied by the company .....		0.000		0.000
5.2 Property held for the 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. Contract loans .....	73,649,137	0.454	73,649,137	0.455
7. Receivables for securities .....	13,429,550	0.083	8,564,333	0.053
8. Cash, cash equivalents and short-term investments .....	51,800,983	0.320	51,800,983	0.320
9. Other invested assets .....	121,317,714	0.748	121,317,714	0.749
10. Total invested assets	16,208,133,087	100.000	16,203,267,870	100.000

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**SCHEDULE A - VERIFICATION BETWEEN YEARS**  
 Real Estate

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 6) .....	
	2.2 Additional investment made after acquisition (Part 2, Column 9) .....	
3.	Current year change in encumbrances:	
	3.1 Totals, Part 1, Column 13 .....	
	3.2 Totals, Part 3, Column 11 .....	
4.	Total gain (loss) on disposals, Part 3, Column 18 .....	
5.	Deduct amounts received on disposals, Part 3, Column 15 .....	
6.	Total foreign exchange change in book/adjusted carrying value:	
	6.1 Totals, Part 1, Column 15 .....	
	6.2 Totals, Part 3, Column 13 .....	
7.	Deduct current year's other than temporary impairment recognized:	
	7.1 Totals, Part 1, Column 12 .....	
	7.2 Totals, Part 3, Column 10 .....	
8.	Deduct current year's depreciation:	
	8.1 Totals, Part 1, Column 11 .....	
	8.2 Totals, Part 3, Column 9 .....	
9.	Book/adjusted carrying value at the end of current period (Lines 1+2+3+4-5+6-7-8) .....	
10.	Deduct total nonadmitted amounts .....	
11.	Statement value at end of current period (Line 9 minus Line 10) .....	

**NONE**

**SCHEDULE B - VERIFICATION BETWEEN YEARS**  
 Mortgage Loans

1.	Book value/recorded investment excluding accrued interest, December 31 of prior year .....	990,327,460
2.	Cost of acquired:	
	2.1 Actual cost at time of acquisition (Part 2, Column 7) .....	263,866,779
	2.2 Additional investment made after acquisition (Part 2, Column 8) .....	600,000
		264,466,779
3.	Capitalized deferred interest and other:	
	3.1 Totals, Part 1, Column 12 .....	
	3.2 Totals, Part 3, Column 11 .....	
4.	Accrual of discount .....	
5.	Unrealized valuation increase (decrease):	
	5.1 Totals, Part 1, Column 9 .....	
	5.2 Totals, Part 3, Column 8 .....	
6.	Total gain (loss) on disposals, Part 3, Column 18 .....	
7.	Deduct amounts received on disposals, Part 3, Column 15 .....	74,862,581
8.	Deduct amortization of premium and mortgage interest points and commitment fees .....	
9.	Total foreign exchange change in book value/recorded investment excluding accrued interest:	
	9.1 Totals, Part 1, Column 13 .....	
	9.2 Totals, Part 3, Column 13 .....	
10.	Deduct current year's other than temporary impairment recognized:	
	10.1 Totals, Part 1, Column 11 .....	2,190,049
	10.2 Totals, Part 3, Column 10 .....	
		2,190,049
11.	Book value/recorded investment excluding accrued interest at end of current period (Lines 1+2+3+4+5+6-7-8+9-10) .....	1,177,741,609
12.	Total valuation allowance .....	
13.	Subtotal (Line 11 plus 12) .....	1,177,741,609
14.	Deduct total nonadmitted amounts .....	
15.	Statement value at end of current period (Line 13 minus Line 14) .....	1,177,741,609

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**SCHEDULE BA - VERIFICATION BETWEEN YEARS**  
 Other Long-Term Invested Assets

1.	Book/adjusted carrying value, December 31 of prior year .....	117,425,940
2.	Cost of acquired:	
	2.1 Actual cost at time of acquisition (Part 2, Column 8) .....	9,049,865
	2.2 Additional investment made after acquisition (Part 2, Column 9) .....	3,556,216
		12,606,081
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 .....	(9,969,028)
	5.2 Totals, Part 3, Column 9 .....	(9,969,028)
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 .....	25,049
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 .....	496,736
	10.2 Totals, Part 3, Column 11 .....	496,736
11.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10) .....	119,541,208
12.	Deduct total nonadmitted amounts .....	
13.	Statement value at end of current period (Line 11 minus Line 12) .....	119,541,208

**SCHEDULE D - VERIFICATION BETWEEN YEARS**  
 Bonds and Stocks

1.	Book/adjusted carrying value, December 31 of prior year .....	13,034,342,720
2.	Cost of bonds and stocks acquired, Part 3, Column 7 .....	3,273,601,216
3.	Accrual of discount .....	49,062,083
4.	Unrealized valuation increase (decrease):	
	4.1. Part 1, Column 12 .....	7,102,087
	4.2. Part 2, Section 1, Column 15 .....	50,840
	4.3. Part 2, Section 2, Column 13 .....	45,093,025
	4.4. Part 4, Column 11 .....	13,446,668
		65,692,620
5.	Total gain (loss) on disposals, Part 4, Column 19 .....	9,187,456
6.	Deduction consideration for bonds and stocks disposed of, Part 4, Column 7 .....	1,506,939,508
7.	Deduct amortization of premium .....	39,029,038
8.	Total foreign exchange change in book/adjusted carrying value:	
	8.1. Part 1, Column 15 .....	665
	8.2. Part 2, Section 1, Column 19 .....	
	8.3. Part 2, Section 2, Column 16 .....	849,735
	8.4. Part 4, Column 15 .....	408,787
		1,259,187
9.	Deduct current year's other than temporary impairment recognized:	
	9.1. Part 1, Column 14 .....	54,816,276
	9.2. Part 2, Section 1, Column 17 .....	
	9.3. Part 2, Section 2, Column 14 .....	23,703,587
	9.4. Part 4, Column 13 .....	38,462,778
		116,982,641
10.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) .....	14,770,194,095
11.	Deduct total nonadmitted amounts .....	
12.	Statement value at end of current period (Line 10 minus Line 11) .....	14,770,194,095

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

**SCHEDULE D - SUMMARY BY COUNTRY**

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

Description		1 Book/Adjusted Carrying Value	2 Fair Value	3 Actual Cost	4 Par Value of Bonds
<b>BONDS</b>					
Governments (Including all obligations guaranteed by governments)	1. United States .....	363,501,575	365,614,025	362,380,654	350,952,389
	2. Canada .....	8,897,129	11,031,404	8,932,250	8,750,000
	3. Other Countries .....	8,525,640	8,971,018	8,567,658	8,559,518
	4. Totals	380,924,344	385,616,447	379,880,562	368,261,907
U.S. States, Territories and Possessions (Direct and guaranteed)	5. Totals	5,410,000	5,450,708	5,410,000	5,410,000
U.S. Political Subdivisions of States, Territories and Possessions (Direct and guaranteed)	6. Totals	234,181,376	230,855,418	145,810,266	307,455,000
U.S. Special revenue and special assessment obligations and all non- guaranteed obligations of agencies and authorities of governments and their political subdivisions	7. Totals	2,020,557,375	2,110,768,149	1,951,623,506	2,092,744,008
Industrial and Miscellaneous, Credit Tenant Loans and Hybrid Securities (unaffiliated)	8. United States .....	10,366,282,854	10,539,621,106	10,453,343,420	10,381,464,244
	9. Canada .....	476,572,310	509,325,501	482,404,756	479,785,939
	10. Other Countries .....	996,182,763	1,029,187,559	1,016,312,393	1,016,667,513
	11. Totals	11,839,037,927	12,078,134,166	11,952,060,569	11,877,917,696
Parent, Subsidiaries and Affiliates	12. Totals				
	13. Total Bonds	14,480,111,022	14,810,824,888	14,434,784,903	14,651,788,611
<b>PREFERRED STOCKS</b>					
Industrial and Miscellaneous (unaffiliated)	14. United States .....	51,680,089	40,503,364	51,535,597	
	15. Canada .....				
	16. Other Countries .....	11,498,856	9,717,383	12,261,887	
	17. Totals	63,178,945	50,220,747	63,797,484	
Parent, Subsidiaries and Affiliates	18. Totals				
	19. Total Preferred Stocks	63,178,945	50,220,747	63,797,484	
<b>COMMON STOCKS</b>					
Industrial and Miscellaneous (unaffiliated)	20. United States .....	110,604,650	110,604,650	104,230,600	
	21. Canada .....	24,111,949	24,111,949	19,918,583	
	22. Other Countries .....	15,189,173	15,189,173	13,879,056	
	23. Totals	149,905,772	149,905,772	138,028,239	
Parent, Subsidiaries and Affiliates	24. Totals	76,998,356	76,998,356	73,405,552	
	25. Total Common Stocks	226,904,128	226,904,128	211,433,791	
	26. Total Stocks	290,083,073	277,124,875	275,231,275	
	27. Total Bonds and Stocks	14,770,194,095	15,087,949,763	14,710,016,178	

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

**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 Rating per the NAIC Designation	1 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	7 Col. 6 as a % of Line 10.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed (a)
1. U.S. Governments											
1.1 Class 1	118,807,286	50,015,171	44,170,719	40,989,587	204,439,442	458,422,205	3.1	432,079,230	3.4	447,830,904	10,591,301
1.2 Class 2											
1.3 Class 3											
1.4 Class 4											
1.5 Class 5											
1.6 Class 6											
1.7 Totals	118,807,286	50,015,171	44,170,719	40,989,587	204,439,442	458,422,205	3.1	432,079,230	3.4	447,830,904	10,591,301
2. All Other Governments											
2.1 Class 1	2,011,869	8,520,343	977,929	5,912,628		17,422,769	0.1	11,834,156	0.1	17,422,769	
2.2 Class 2											
2.3 Class 3											
2.4 Class 4											
2.5 Class 5											
2.6 Class 6											
2.7 Totals	2,011,869	8,520,343	977,929	5,912,628		17,422,769	0.1	11,834,156	0.1	17,422,769	
3. U.S. States, Territories and Possessions etc., Guaranteed											
3.1 Class 1			4,810,000	600,000		5,410,000	0.0	13,317,707	0.1	5,410,000	
3.2 Class 2											
3.3 Class 3											
3.4 Class 4											
3.5 Class 5											
3.6 Class 6											
3.7 Totals			4,810,000	600,000		5,410,000	0.0	13,317,707	0.1	5,410,000	
4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed											
4.1 Class 1	14,304,307	28,547,168	16,250,701	44,469,220	17,884,165	121,455,561	0.8	106,301,095	0.8	121,455,561	
4.2 Class 2	1,000,073	1,043,883	80,636,393	20,505,152	4,966,809	108,152,310	0.7	122,424,141	1.0	108,152,310	
4.3 Class 3				4,573,503		4,573,503	0.0			4,573,503	
4.4 Class 4											
4.5 Class 5											
4.6 Class 6											
4.7 Totals	15,304,380	29,591,051	96,887,094	69,547,875	22,850,974	234,181,374	1.6	228,725,236	1.8	234,181,374	
5. U.S. Special Revenue & Special Assessment Obligations etc., Non-Guaranteed											
5.1 Class 1	401,607,389	592,658,368	334,910,602	393,031,896	196,292,355	1,918,500,610	13.2	1,963,988,695	15.5	1,918,500,610	
5.2 Class 2		38,846,654	57,994,020	4,367,725		101,208,399	0.7	94,581,936	0.7	62,613,373	38,595,026
5.3 Class 3								3,080,000	0.0		
5.4 Class 4								848,364	0.0		
5.5 Class 5					848,371	848,371	0.0				848,371
5.6 Class 6											
5.7 Totals	401,607,389	631,505,022	392,904,622	397,399,621	197,140,726	2,020,557,380	13.9	2,062,498,995	16.3	1,981,113,983	39,443,397

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

**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 Rating per the NAIC Designation	1 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	7 Col. 6 as a % of Line 10.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed (a)
<b>6. Industrial &amp; Miscellaneous (Unaffiliated)</b>											
6.1 Class 1	346,134,635	1,336,338,712	1,799,137,613	854,105,014	938,237,561	5,273,953,535	36.2	4,161,033,799	32.9	4,601,804,776	672,148,759
6.2 Class 2	248,342,892	1,576,519,231	1,677,452,751	920,265,483	708,693,933	5,131,274,290	35.2	4,853,420,469	38.4	3,977,181,029	1,154,093,261
6.3 Class 3	5,630,068	149,976,420	102,733,482	185,522,219	80,708,120	524,570,309	3.6	487,390,696	3.9	373,870,650	150,699,659
6.4 Class 4	7,645,941	104,066,508	55,088,848	31,592,221	18,957,873	217,351,391	1.5	259,120,961	2.1	95,753,197	121,598,194
6.5 Class 5	478,784	47,547,667	27,669,150	23,287,365	1,664,424	100,647,390	0.7	125,951,566	1.0	79,097,822	21,549,568
6.6 Class 6	437,500	7,474,135	13,524,076	2,051,154	20,265,594	43,752,459	0.3	2,549,697	0.0	20,982,316	22,770,143
6.7 Totals	608,669,820	3,221,922,673	3,675,605,920	2,016,823,456	1,768,527,505	11,291,549,374	77.5	9,889,467,188	78.3	9,148,689,790	2,142,859,584
<b>7. Credit Tenant Loans</b>											
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											
<b>8. Hybrid Securities</b>											
8.1 Class 1			9,911,926	53,276,152	191,468,451	254,656,529	1.7			210,870,072	43,786,457
8.2 Class 2				19,685,265	113,382,226	133,067,491	0.9			133,067,491	
8.3 Class 3		902,655	320,644	20,494,905	100,182,754	121,900,958	0.8			119,295,371	2,605,587
8.4 Class 4					25,213,768	25,213,768	0.2			2,723,972	22,489,796
8.5 Class 5				12,649,803		12,649,803	0.1				12,649,803
8.6 Class 6											
8.7 Totals		902,655	10,232,570	106,106,125	430,247,199	547,488,549	3.8			465,956,906	81,531,643
<b>9. Parent, Subsidiaries and Affiliates</b>											
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											

9015

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

**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 Rating per the NAIC Designation	1 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	7 Col. 6 as a % of Line 10.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed (a)
<b>10. Total Bonds Current Year</b>											
10.1 Class 1	(d) 882,865,486	2,016,079,762	2,210,169,490	1,392,384,497	1,548,321,974	8,049,821,209	55.2	XXX	XXX	7,323,294,692	726,526,517
10.2 Class 2	(d) 249,342,965	1,616,409,768	1,816,083,164	964,823,625	827,042,968	5,473,702,490	37.6	XXX	XXX	4,281,014,203	1,192,688,287
10.3 Class 3	(d) 5,630,068	150,879,075	103,054,126	210,590,627	180,890,874	651,044,770	4.5	XXX	XXX	497,739,524	153,305,246
10.4 Class 4	(d) 7,645,941	104,066,508	55,088,848	31,592,221	44,171,641	242,565,159	1.7	XXX	XXX	98,477,169	144,087,990
10.5 Class 5	(d) 478,784	47,547,667	27,669,150	35,937,168	2,512,795	114,145,564	0.8	XXX	XXX	79,097,822	35,047,742
10.6 Class 6	(d) 437,500	7,474,135	13,524,076	2,051,154	20,265,594	43,752,459	0.3	XXX	XXX	20,982,316	22,770,143
10.7 Totals	1,146,400,744	3,942,456,915	4,225,588,854	2,637,379,292	2,623,205,846	(b) 14,575,031,651	100.0	XXX	XXX	12,300,605,726	2,274,425,925
10.8 Line 10.7 as a % of Col. 6	7.9	27.0	29.0	18.1	18.0	100.0	XXX	XXX	XXX	84.4	15.6
<b>11. Total Bonds Prior Year</b>											
11.1 Class 1	794,919,012	1,870,664,356	1,414,610,648	1,435,650,375	1,172,710,291	XXX	XXX	6,688,554,682	52.9	6,171,838,569	516,716,113
11.2 Class 2	189,863,653	1,328,484,042	1,532,467,125	1,012,147,126	1,007,464,600	XXX	XXX	5,070,426,546	40.1	3,876,740,206	1,193,686,340
11.3 Class 3	3,433,361	118,329,737	116,532,742	126,821,546	125,353,310	XXX	XXX	490,470,696	3.9	342,666,283	147,804,413
11.4 Class 4	4,643,080	91,318,740	89,326,913	37,842,102	36,838,490	XXX	XXX	259,969,325	2.1	186,309,372	73,659,953
11.5 Class 5	6,036,476	44,277,239	44,991,730	27,404,640	3,241,481	XXX	XXX	(c) 125,951,566	1.0	94,747,817	31,203,749
11.6 Class 6		121,500	699,100	139,125	1,589,972	XXX	XXX	(c) 2,549,697	0.0	2,537,197	12,500
11.7 Totals	998,895,582	3,453,195,614	3,198,628,258	2,640,004,914	2,347,198,144	XXX	XXX	(b) 12,637,922,512	100.0	10,674,839,444	1,963,083,068
11.8 Line 11.7 as a % of Col. 8	7.9	27.3	25.3	20.9	18.6	XXX	XXX	100.0	XXX	84.5	15.5
<b>12. Total Publicly Traded Bonds</b>											
12.1 Class 1	865,718,930	1,856,627,708	1,973,894,353	1,152,960,929	1,474,092,771	7,323,294,691	50.2	6,171,838,569	48.8	7,323,294,691	XXX
12.2 Class 2	202,574,063	1,271,192,965	1,310,430,454	806,766,155	690,050,567	4,281,014,204	29.4	3,876,740,206	30.7	4,281,014,204	XXX
12.3 Class 3	3,467,911	69,350,991	73,630,010	173,335,939	177,954,674	497,739,525	3.4	342,666,283	2.7	497,739,525	XXX
12.4 Class 4	3,686,534	37,702,324	29,964,986	23,106,956	4,016,369	98,477,169	0.7	186,309,372	1.5	98,477,169	XXX
12.5 Class 5	424,453	42,665,986	14,299,866	21,707,516	79,097,821	79,097,821	0.5	94,747,817	0.7	79,097,821	XXX
12.6 Class 6		4,921,894	13,524,076	2,051,154	485,192	20,982,316	0.1	2,537,197	0.0	20,982,316	XXX
12.7 Totals	1,075,871,891	3,282,461,868	3,415,743,745	2,179,928,649	2,346,599,573	12,300,605,726	84.4	10,674,839,444	84.5	12,300,605,726	XXX
12.8 Line 12.7 as a % of Col. 6	8.7	26.7	27.8	17.7	19.1	100.0	XXX	XXX	XXX	100.0	XXX
12.9 Line 12.7 as a % of Line 10.7, Col. 6, Section 10	7.4	22.5	23.4	15.0	16.1	84.4	XXX	XXX	XXX	84.4	XXX
<b>13. Total Privately Placed Bonds</b>											
13.1 Class 1	17,146,556	159,452,054	236,275,137	239,423,568	74,229,203	726,526,518	5.0	516,716,113	4.1	XXX	726,526,518
13.2 Class 2	46,768,902	345,216,803	505,652,710	158,057,470	136,992,401	1,192,688,286	8.2	1,193,686,340	9.4	XXX	1,192,688,286
13.3 Class 3	2,162,157	81,528,084	29,424,116	37,254,688	2,936,200	153,305,245	1.1	147,804,413	1.2	XXX	153,305,245
13.4 Class 4	3,959,407	66,364,184	25,123,862	8,485,265	40,155,272	144,087,990	1.0	73,659,953	0.6	XXX	144,087,990
13.5 Class 5	54,331	4,881,681	13,369,284	14,229,652	2,512,795	35,047,743	0.2	31,203,749	0.2	XXX	35,047,743
13.6 Class 6	437,500	2,552,241			19,780,402	22,770,143	0.2	12,500	0.0	XXX	22,770,143
13.7 Totals	70,528,853	659,995,047	809,845,109	457,450,643	276,606,273	2,274,425,925	15.6	1,963,083,068	15.5	XXX	2,274,425,925
13.8 Line 13.7 as a % of Col. 6	3.1	29.0	35.6	20.1	12.2	100.0	XXX	XXX	XXX	XXX	100.0
13.9 Line 13.7 as a % of Line 10.7, Col. 6, Section 10	0.5	4.5	5.6	3.1	1.9	15.6	XXX	XXX	XXX	XXX	15.6

(a) Includes \$ 1,456,022,735 freely tradable under SEC Rule 144 or qualified for resale under SEC Rule 144A.

(b) Includes \$ 93,538,013 current year, \$ 374,735,936 prior year of bonds with Z designations and \$ , current year \$ prior year of bonds with Z\* designations. The letter "Z" means the NAIC designation was not assigned by the Securities Valuation Office (SVO) at the date of the statement. "Z\*" means the SVO could not evaluate the obligation because valuation procedures for the security class are under regulatory review.

(c) Includes \$ 848,371 current year, \$ prior year of bonds with 5\* designations and \$ 552,271 , current year \$ prior year of bonds with 6\* designations. "5\*" means the NAIC designation was assigned by the (SVO) in reliance on the insurer's certification that the issuer is current in all principal and interest payments. "6\*" means the NAIC designation was assigned by the SVO due to inadequate certification of principal and interest payments.

(d) Includes the following amount of non-rated short-term and cash equivalent bonds by NAIC designation: NAIC 1 \$ 94,920,630 ; NAIC 2 \$ ; NAIC 3 \$ ; NAIC 4 \$ ; NAIC 5 \$ ; NAIC 6 \$

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

**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

Distribution by Type	1 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	7 Col. 6 as a % of Line 10.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed
<b>1. U.S. Governments</b>											
1.1 Issuer Obligations	95,020,606	5,111,345	17,080,353	1,271,238	988,855	119,472,397	0.8	401,834,902	3.2	119,472,397	
1.2 Single Class Mortgage-Backed /Asset Backed Securities	23,786,680	44,903,826	27,090,366	39,718,348	203,450,587	338,949,807	2.3	30,244,327	0.2	328,358,507	10,591,300
1.7 Totals	118,807,286	50,015,171	44,170,719	40,989,586	204,439,442	458,422,204	3.1	432,079,229	3.4	447,830,904	10,591,300
<b>2. All Other Governments</b>											
2.1 Issuer Obligations	2,011,869	8,520,343	977,929	5,912,628		17,422,769	0.1	11,834,156	0.1	17,422,769	
2.2 Single Class Mortgage-Backed /Asset Backed Securities											
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	2,011,869	8,520,343	977,929	5,912,628		17,422,769	0.1	11,834,156	0.1	17,422,769	
<b>3. U.S. States, Territories and Possessions, Guaranteed</b>											
3.1 Issuer Obligations			4,810,000	600,000		5,410,000	0.0	13,317,707	0.1	5,410,000	
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			4,810,000	600,000		5,410,000	0.0	13,317,707	0.1	5,410,000	
<b>4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed</b>											
4.1 Issuer Obligations	15,304,380	29,591,052	96,887,093	69,547,875	22,850,975	234,181,375	1.6	228,725,236	1.8	234,181,375	
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	15,304,380	29,591,052	96,887,093	69,547,875	22,850,975	234,181,375	1.6	228,725,236	1.8	234,181,375	
<b>5. U.S. Special Revenue &amp; Special Assessment Obligations etc., Non-Guaranteed</b>											
5.1 Issuer Obligations	35,017,127	47,030,926	67,224,782	74,307,049	18,364,033	241,943,917	1.7	240,015,544	1.9	202,500,520	39,443,397
5.2 Single Class Mortgage-Backed /Asset Backed Securities	56,971,323	132,602,836	64,912,733	47,482,797	14,254,700	316,224,389	2.2	214,192,534	1.7	316,224,389	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
5.3 Defined	294,487,293	441,548,462	256,449,515	205,230,493	11,757,145	1,209,472,908	8.3	1,607,304,077	12.7	1,209,472,908	
5.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
5.5 Defined	15,131,646	10,322,797	4,317,592	70,379,281	152,764,848	252,916,164	1.7			252,916,164	
5.6 Other						986,842			0.0		
5.7 Totals	401,607,389	631,505,021	392,904,622	397,399,620	197,140,726	2,020,557,378	13.9	2,062,498,997	16.3	1,981,113,981	39,443,397

8018



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

**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

Distribution by Type	1 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	7 Col. 6 as a % of Line 10.7	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											
6.1 Issuer Obligations .....	396,799,963	2,550,448,491	3,087,412,856	1,892,871,291	1,753,140,048	9,680,672,649	66.4	8,212,093,658	65.0	7,685,252,868	1,995,419,781
6.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
6.3 Defined .....	47,673,040	90,012,658	36,735,505	24,300,827	5,027,268	203,749,298	1.4	448,407,143	3.5	203,749,298	
6.4 Other .....	61,522,974	116,841,918	32,902,143	31,573,428	10,360,189	253,200,652	1.7	36,690,387	0.3	253,200,652	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES:											
6.5 Defined .....	96,755,747	413,572,900	441,139,876	57,233,042		1,008,701,565	6.9	687,534,122	5.4	896,719,460	111,982,105
6.6 Other .....	5,918,096	51,046,706	77,415,539	10,844,868		145,225,209	1.0	504,741,876	4.0	109,767,512	35,457,697
6.7 Totals	608,669,820	3,221,922,673	3,675,605,919	2,016,823,456	1,768,527,505	11,291,549,373	77.5	9,889,467,186	78.3	9,148,689,790	2,142,859,583
7. Credit Tenant Loans											
7.1 Issuer Obligations .....											
7.2 Single Class Mortgage-Backed Securities .....											
7.7 Totals											
8. Hybrid Securities											
8.1 Issuer Obligations .....		902,655	10,232,570	106,106,125	430,247,199	547,488,549	3.8			465,956,906	81,531,643
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		902,655	10,232,570	106,106,125	430,247,199	547,488,549	3.8			465,956,906	81,531,643
9. 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											

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

**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

Distribution by Type	1 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	7 Col. 6 as a % of Line 10.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed
<b>10. Total Bonds Current Year</b>											
10.1 Issuer Obligations	544,153,945	2,641,604,812	3,284,625,583	2,150,616,206	2,225,591,110	10,846,591,656	74.4	XXX	XXX	8,730,196,835	2,116,394,821
10.2 Single Class Mortgage-Backed /Asset Backed Securities	80,758,003	177,506,662	92,003,099	87,201,145	217,705,287	655,174,196	4.5	XXX	XXX	644,582,896	10,591,300
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
10.3 Defined	342,160,333	531,561,120	293,185,020	229,531,320	16,784,413	1,413,222,206	9.7	XXX	XXX	1,413,222,206	
10.4 Other	61,522,974	116,841,918	32,902,143	31,573,428	10,360,189	253,200,652	1.7	XXX	XXX	253,200,652	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
10.5 Defined	111,887,393	423,895,697	445,457,468	127,612,323	152,764,848	1,261,617,729	8.7	XXX	XXX	1,149,635,624	111,982,105
10.6 Other	5,918,096	51,046,706	77,415,539	10,844,868		145,225,209	1.0	XXX	XXX	109,767,512	35,457,697
10.7 Totals	1,146,400,744	3,942,456,915	4,225,588,852	2,637,379,290	2,623,205,847	14,575,031,648	100.0	XXX	XXX	12,300,605,725	2,274,425,923
10.8 Line 10.7 as a % of Col. 6	7.9	27.0	29.0	18.1	18.0	100.0	XXX	XXX	XXX	84.4	15.6
<b>11. Total Bonds Prior Year</b>											
11.1 Issuer Obligations	631,248,304	2,194,905,413	2,357,015,188	1,946,879,500	1,977,772,798	XXX	XXX	9,107,821,203	72.1	7,323,837,202	1,783,984,001
11.2 Single Class Mortgage-Backed /Asset Backed Securities	21,228,278	78,724,962	67,506,731	59,599,791	17,377,099	XXX	XXX	244,436,861	1.9	229,051,603	15,385,258
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
11.3 Defined	222,288,040	710,695,929	232,754,169	569,798,622	320,174,460	XXX	XXX	2,055,711,220	16.3	2,055,711,221	(1)
11.4 Other	3,691,833	19,974,662	8,589,784	3,809,204	624,904	XXX	XXX	36,690,387	0.3	36,690,387	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
11.5 Defined	37,567,281	294,961,367	329,027,562	21,609,701	4,368,211	XXX	XXX	687,534,122	5.4	654,592,148	32,941,974
11.6 Other	82,871,845	153,933,282	203,734,824	38,308,096	26,880,671	XXX	XXX	505,728,718	4.0	374,956,884	130,771,834
11.7 Totals	998,895,581	3,453,195,615	3,198,628,258	2,640,004,914	2,347,198,143	XXX	XXX	12,637,922,511	100.0	10,674,839,445	1,963,083,066
11.8 Line 11.7 as a % of Col. 8	7.9	27.3	25.3	20.9	18.6	XXX	XXX	100.0	XXX	84.5	15.5
<b>12. Total Publicly Traded Bonds</b>											
12.1 Issuer Obligations	489,466,927	2,029,796,327	2,506,050,127	1,753,231,175	1,951,652,294	8,730,196,850	59.9	7,323,837,202	58.0	8,730,196,850	XXX
12.2 Single Class Mortgage-Backed /Asset Backed Securities	80,369,490	175,343,213	89,463,752	84,368,597	215,037,829	644,582,881	4.4	229,051,603	1.8	644,582,881	XXX
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
12.3 Defined	342,160,333	531,561,120	293,185,020	229,531,320	16,784,413	1,413,222,206	9.7	2,055,711,221	16.3	1,413,222,206	XXX
12.4 Other	61,522,974	116,841,918	32,902,143	31,573,428	10,360,189	253,200,652	1.7	36,690,387	0.3	253,200,652	XXX
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
12.5 Defined	99,610,611	392,858,984	434,021,901	70,379,261	152,764,848	1,149,635,605	7.9	654,592,148	5.2	1,149,635,605	XXX
12.6 Other	2,741,556	36,060,306	60,120,802	10,844,868		109,767,532	0.8	374,956,884	3.0	109,767,532	XXX
12.7 Totals	1,075,871,891	3,282,461,868	3,415,743,745	2,179,928,649	2,346,599,573	12,300,605,726	84.4	10,674,839,445	84.5	12,300,605,726	XXX
12.8 Line 12.7 as a % of Col. 6	8.7	26.7	27.8	17.7	19.1	100.0	XXX	XXX	XXX	100.0	XXX
12.9 Line 12.7 as a % of Line 10.7, Col. 6, Section 10	7.4	22.5	23.4	15.0	16.1	84.4	XXX	XXX	XXX	84.4	XXX
<b>13. Total Privately Placed Bonds</b>											
13.1 Issuer Obligations	54,687,018	611,808,485	778,575,456	397,385,031	273,938,816	2,116,394,806	14.5	1,783,984,001	14.1	XXX	2,116,394,806
13.2 Single Class Mortgage-Backed /Asset Backed Securities	388,513	2,163,449	2,539,347	2,832,548	2,667,458	10,591,315	0.1	15,385,258	0.1	XXX	10,591,315
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
13.3 Defined								(1)	0.0	XXX	
13.4 Other										XXX	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
13.5 Defined	12,276,782	31,036,713	11,435,567	57,233,062		111,982,124	0.8	32,941,974	0.3	XXX	111,982,124
13.6 Other	3,176,540	14,986,400	17,294,737			35,457,677	0.2	130,771,834	1.0	XXX	35,457,677
13.7 Totals	70,528,853	659,995,047	809,845,107	457,450,641	276,606,274	2,274,425,922	15.6	1,963,083,066	15.5	XXX	2,274,425,922
13.8 Line 13.7 as a % of Col. 6	3.1	29.0	35.6	20.1	12.2	100.0	XXX	XXX	XXX	XXX	100.0
13.9 Line 13.7 as a % of Line 10.7, Col. 6, Section 10	0.5	4.5	5.6	3.1	1.9	15.6	XXX	XXX	XXX	XXX	15.6

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

**SCHEDULE DA - VERIFICATION BETWEEN YEARS**

Short-Term Investments

	1	2	3	4	5
	Total	Bonds	Mortgage Loans	Other Short-term Investment Assets (a)	Investments in Parent, Subsidiaries and Affiliates
1. Book/adjusted carrying value, December 31 of prior year .....	324,132,457	324,132,457			
2. Cost of short-term investments acquired .....	4,351,287,609	4,351,287,609			
3. Accrual of discount .....	11,514	11,514			
4. Unrealized valuation increase (decrease) .....					
5. Total gain (loss) on disposals .....					
6. Deduct consideration received on disposals .....	4,580,504,319	4,580,504,319			
7. Deduct amortization of premium .....	6,631	6,631			
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) .....	94,920,630	94,920,630			
11. Deduct total nonadmitted amounts .....					
12. Statement value at end of current period (Line 10 minus Line 11)	94,920,630	94,920,630			

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

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**SCHEDULE DB - PART A - VERIFICATION BETWEEN YEARS**  
Options, Caps, Floors and Insurance Futures Options Owned

1.	Book value, December 31, prior year (Line 8, prior year) .....	1,424,000
2.	Cost/Option Premium (Section 2, Column 7) .....	2,370,000
3.	Increase/(Decrease) by Adjustment (Section 1, Column 12) plus (Section 3, Column 13) .....	
4.	Gain/(Loss) on Termination:	
	4.1 Recognized (Section 3, Column 14) .....	2,266,839
	4.2 Used to Adjust Basis of Hedged Item (Section 3, Column 15) .....	2,266,839
5.	Consideration Received on Terminations (Section 3, Column 12) .....	3,690,839
6.	Used to Adjust Basis on Open Contracts (Section 1, Column 13) .....	
7.	Disposition of Deferred Amount on Contracts Terminated in Prior Year:	
	7.1 Recognized .....	
	7.2 Used to Adjust Basis of Hedged Item .....	
8.	Book value, December 31, current year (Lines 1+2+3+4-5-6-7) .....	2,370,000

**SCHEDULE DB - PART B - VERIFICATION BETWEEN YEARS**  
Options, Caps, Floors and Insurance Futures Options Written

1.	Book value, December 31, prior year (Line 8, prior year) .....	
2.	Consideration received (Section 2, Column 7) .....	
3.	Increase/(Decrease) by Adjustment (Section 1, Column 12) plus (Section 3, Column 13) .....	
4.	Gain/(Loss) on Termination:	
	4.1 Recognized (Section 3, Column 14) .....	
	4.2 Used to Adjust Basis (Section 3, Column 15) .....	
5.	Consideration Paid on Terminations (Section 3, Column 12) .....	
6.	Used to Adjust Basis on Open Contracts (Section 1, Column 13) .....	
7.	Disposition of Deferred Amount on Contracts Terminated in Prior Year:	
	7.1 Recognized .....	
	7.2 Used to Adjust Basis .....	
8.	Book value, December 31, current year .....	

NONE

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company  
**SCHEDULE DB - PART C - VERIFICATION BETWEEN YEARS**  
 Swaps and Forwards

1.	Book value, December 31, prior year (Line 8, prior year)	.....
2.	Cost or (Consideration Received) (Section 2, Column 7)	.....
3.	Increase/(Decrease) by Adjustment (Section 1, Column 12) plus (Section 3, Column 13)	.....
4.	Gain/(Loss) on Termination:	
4.1	Recognized (Section 3, Column 14)	.....
4.2	Used to Adjust Basis of Hedged Item (Section 3, Column 15)	.....
5.	Consideration Received (or Paid) on Termination (Section 3, Column 12)	.....
6.	Used to Adjust Basis of Hedged Item on Open Contracts (Section 1, Column 13)	.....
7.	Disposition of Deferred Amount on Contracts Terminated in Prior Year:	
7.1	Recognized	.....
7.2	Used to Adjust Basis of Hedged Item	.....
8.	Book value, December 31, current year (Lines 1+2+3+4-5-6-7)	.....

**NONE**

**SCHEDULE DB - PART D- VERIFICATION BETWEEN YEARS**  
 Futures Contracts and Insurance Futures Contracts

1.	Book value, December 31, prior year (Line 8, prior year)	.....
2.	Change in total Variation Margin on Open Contracts (Difference between years - Section 1, Column 6)	.....
3.1	Change in Variation Margin on Open Contracts Used to Adjust Basis of Hedged Item (Section 1, Column 11)	.....
3.2	Change in Variation Margin on Open Contracts Recognized (Difference between years - Section 1, Column 10)	.....
4.1	Variation Margin on Contracts Terminated During the Year (Section 3, Column 6)	.....
4.2	Less:	
4.21	Gain/(Loss) Recognized in Current Year (Section 3, Column 7)	.....
4.22	Gain/(Loss) Used to Adjust Basis of Hedge (Section 3, Column 12)	.....
4.3	Subtotal (Line 4.1 minus Line 4.2)	.....
5.1	Net additions to Cash Deposits (Section 2, Column 7)	.....
5.2	Less: Net Reductions to Cash Deposits (Section 3, Column 9)	.....
6.	Subtotal (Lines 1 - 2 + 3.1 + 3.2 - 4.3 + 5.2)	.....
7.	7. Disposition of Gain/(Loss) on Contracts Terminated in Prior Year:	
7.1	Recognized	.....
7.2	Used to Adjust Basis of Hedged Item	.....
8.	Book value, December 31, current year (Lines 6+7.1+7.2)	.....

**NONE**

**SCHEDULE DB - PART E - VERIFICATION**  
 Statement Value and Fair Value of Open Contracts

		Statement Value
1.	Part A, Section 1, Column 10	1,776,506
2.	Part B, Section 1, Column 10	.....
3.	Part C, Section 1, Column 10	.....
4.	Part D, Section 1, Column 9 - 12	.....
5.	Lines (1) - (2) + (3) + (4)	1,776,506
6.	Part E, Section 1, Column 4	1,776,506
7.	Part E, Section 1, Column 5	.....
8.	Lines (5) - (6) - (7)	.....
		Fair Value
9.	Part A, Section 1, Column 11	1,776,506
10.	Part B, Section 1, Column 11	.....
11.	Part C, Section 1, Column 11	.....
12.	Part D, Section 1, Column 9	.....
13.	Lines (9) - (10) + (11) + (12)	1,776,506
14.	Part E, Section 1, Column 7	1,776,506
15.	Part E, Section 1, Column 8	.....
16.	Lines (13) - (14) - (15)	.....

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

**N O N E**

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

**N O N E**

Schedule E - Verification - Cash Equivalents

**N O N E**

Schedule A - Part 1 - Real Estate Owned

**N O N E**

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

**N O N E**

Schedule A - Part 3 - Real Estate Disposed

**N O N E**

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1098		MONTGOMERY	AL		01/25/2000	8.125	920,462						2,050,000	11/12/1999
1802		PRATVILLE	AL		08/15/2008	6.625	3,410,409						5,825,000	07/21/2008
1442		LITTLE ROCK	AR		03/12/2004	9.750	268,935						3,850,000	12/10/2003
1766		LOWELL	AR		04/10/2008	6.250	1,695,909						2,500,000	02/22/2008
1550		CHANDLER	AZ		09/29/2005	5.650	800,120						1,530,000	08/01/2005
1573		CHANDLER	AZ		01/06/2006	5.750	1,322,519						2,700,000	11/02/2005
1539		GLENDALE	AZ		10/17/2005	5.800	1,008,804						2,740,000	06/07/2005
1867		GLENDALE	AZ		04/15/2009	6.950	3,965,395						8,220,000	04/01/2009
1367		MESA	AZ		05/06/2003	6.500	958,284						1,870,000	02/21/2003
1536		MESA	AZ		06/29/2005	5.750	1,030,580						3,150,000	05/17/2005
1469		PHOENIX	AZ		07/29/2004	6.625	675,542						1,295,000	05/28/2004
1484		PHOENIX	AZ		12/10/2004	5.188	1,068,576						1,635,000	10/06/2004
1547		PHOENIX	AZ		09/20/2005	5.500	751,497						1,150,000	07/21/2005
1549		PHOENIX	AZ		09/29/2005	5.650	704,092						1,420,000	07/29/2005
1747		PHOENIX	AZ		12/27/2007	6.125	1,834,316						2,900,000	12/02/2007
1784		PHOENIX	AZ		05/19/2008	6.500	2,631,965						4,600,000	04/30/2008
1807		PHOENIX	AZ		09/11/2008	6.200	3,550,007						5,900,000	07/17/2008
1589		SCOTTSDALE	AZ		03/09/2006	5.920	2,530,223						3,900,000	01/12/2006
1155		TUCSON	AZ		10/31/2000	5.750	1,776,413						2,900,000	08/14/2000
1459		TUCSON	AZ		06/17/2004	5.875	405,656						2,000,000	04/14/2004
1511		TUCSON	AZ		05/26/2005	5.250	2,705,377						4,510,000	03/23/2005
1552		TUCSON	AZ		10/14/2005	5.700	2,980,196						5,100,000	08/04/2005
1785		TUCSON	AZ		05/15/2008	6.650	1,539,492						2,790,000	04/21/2008
1798		TUCSON	AZ		07/14/2008	6.490	2,688,637						4,180,000	06/16/2008
1036		ALISO VIEJO	CA		07/01/1999	7.375	329,043						1,750,000	04/29/1999
1894		ALISO VIEJO	CA		07/27/2009	6.950	5,472,745						9,580,000	06/30/2009
1941		ALISO VIEJO	CA		12/28/2009	6.300	2,300,000						5,550,000	12/07/2009
0730		ANAHEIM	CA		12/07/1995	8.500	93,435						1,650,000	09/06/1995
1358		ANAHEIM	CA		03/27/2003	6.500	482,892						1,750,000	01/10/2003
1531		ANAHEIM	CA		07/27/2005	5.650	1,502,477						3,400,000	05/06/2005
0811		ARCADIA	CA		03/31/1997	8.625	170,309						1,180,000	11/14/1996
1514		ARCADIA	CA		05/16/2005	5.875	1,382,304						2,750,000	03/30/2005
1616		ARCADIA	CA		05/27/2004	6.500	3,115,806						5,200,000	04/14/2004
1404		BAKERSFIELD	CA		08/28/2003	6.250	552,097						1,800,000	06/20/2003
1733		BELL	CA		11/27/2007	6.375	2,104,500						4,160,000	09/25/2007
1608		BELLFLOWER	CA		05/24/2006	6.250	673,261						1,400,000	03/30/2006
ASL 20146		BERKELEY	CA		08/22/1995	8.430	235,415						989,000	09/01/1995
1640		BEVERLY HILLS	CA		10/23/2006	6.125	5,654,566						21,730,000	08/31/2006
0409		BURBANK	CA		11/17/1987	6.500	542,772						3,860,000	09/10/1987
1853		BURLINGAME	CA		02/03/2009	6.750	4,833,476						13,600,000	12/23/2008
1856		BURLINGAME	CA		02/12/2009	6.650	5,435,264						24,000,000	01/12/2009
1920		BURLINGAME	CA		11/12/2009	6.550	5,000,000						9,850,000	10/14/2009
1375		CAMARILLO	CA		04/23/2003	6.000	493,531						1,500,000	03/18/2003
1673		CAMPBELL	CA		07/02/2007	6.230	6,456,476						14,000,000	05/25/2004
0901		CANOGA PARK	CA		03/27/1998	7.500	358,837						1,100,000	01/07/1998
0962		CANOGA PARK	CA		11/12/1998	7.000	327,703						715,000	09/16/1998
1835		CANOGA PARK	CA		11/25/2008	6.950	2,707,546						5,200,000	10/23/2008
1295		CERRITOS	CA		05/09/2002	8.000	1,021,397						2,450,000	03/06/2002
0434		CHATSWORTH	CA		06/22/1988	7.500	290,446						1,520,300	04/21/1988
0751		CHATSWORTH	CA		02/13/1996	8.250	235,170						3,650,000	12/07/1995
0963		CHATSWORTH	CA		10/20/1998	7.000	1,169,990						2,800,000	09/16/1998
1177		CHATSWORTH	CA		12/21/2000	8.460	238,980						3,000,000	11/13/2000
1590		CITRUS HEIGHTS	CA		03/15/2006	7.000	1,130,186						2,560,000	01/19/2006
1548		CITY OF INDUSTRY	CA		09/01/2005	5.690	1,506,217						2,700,000	07/29/2005
1730		CITY OF INDUSTRY	CA		10/15/2007	6.500	1,591,038						3,310,000	09/07/2007
0920		CLOVIS	CA		05/28/1998	7.500	409,096						1,150,000	04/06/1998
1173		CLOVIS	CA		01/22/2001	7.625	565,245						1,900,000	11/02/2000
1191		CLOVIS	CA		04/11/2001	7.580	776,726						1,458,000	02/20/2001
1659		COLTON	CA		04/06/2007	6.090	513,309						1,540,000	03/23/2007
0831		CORONA	CA		06/26/1997	8.500	272,481						2,250,000	03/12/1997
1394		CULVER CITY	CA		07/31/2003	5.750	419,042						4,350,000	05/23/2003
1562		CULVER CITY	CA		11/22/2005	6.375	1,666,356						3,550,000	09/14/2005

E04

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1706		DANA POINT	CA		12/20/2007	6.460	1,363,547						2,600,000	09/03/2007
1934		DANA POINT	CA		11/20/2009	7.500	4,500,000						9,940,000	03/03/2009
0918		DANVILLE	CA		06/12/1998	7.750	281,306						1,310,000	04/03/1998
1691		DANVILLE	CA		08/30/2007	6.620	621,524						2,000,000	07/30/2007
1003		DIXON	CA		04/09/1999	7.875	342,389						797,000	02/04/1999
1487		DOWNEY	CA		12/27/2004	5.750	953,444						2,330,000	10/27/2004
1808		DOWNEY	CA		09/15/2008	6.200	1,379,243						3,230,000	07/31/2008
1373		EL CAJON	CA		05/20/2003	6.250	798,532						2,100,000	03/11/2003
0711		EL CERRITO	CA		07/31/1995	6.000	464,845						1,800,000	06/02/1995
0362		EL SEGUNDO	CA		10/29/1986	10.750	180,188						1,260,000	09/08/1986
0966		EL SEGUNDO	CA		12/01/1998	7.500	467,970						1,660,000	09/25/1998
1864		EMERYVILLE	CA		04/15/2009	6.750	2,286,373						7,100,000	03/20/2009
1583		ESCONDIDO	CA		03/15/2006	6.000	1,069,557						1,959,000	12/29/2005
1317		FAIRFIELD	CA		08/14/2002	7.250	1,263,509						4,500,000	07/11/2002
1545		FOLSOM	CA		01/18/2006	6.135	1,112,348						3,050,000	07/21/2005
1267		FORT BRAGG	CA		12/28/2001	7.500	792,297						1,860,000	10/02/2001
1390		FOSTER CITY	CA		05/30/2003	6.000	1,113,968						3,380,000	04/29/2003
0804		FRESNO	CA		02/06/1997	8.625	104,203						1,150,000	10/15/1996
0913		FRESNO	CA		06/03/1998	7.250	168,741						2,684,000	02/26/1998
1007		FRESNO	CA		07/30/1999	7.875	2,887,539						7,250,000	03/03/1999
1041		FRESNO	CA		09/01/1999	7.500	221,594						667,000	06/10/1999
1096		FRESNO	CA		01/28/2000	8.125	638,593						1,275,000	11/10/1999
1144		FRESNO	CA		08/01/2000	5.750	1,116,523						2,300,000	06/28/2000
1345		FRESNO	CA		04/04/2003	5.750	556,089						1,050,000	11/12/2002
1363		FRESNO	CA		04/03/2003	5.750	520,057						1,510,000	01/21/2003
1379		FRESNO	CA		06/30/2003	6.375	855,597						2,385,000	04/01/2003
1449		FRESNO	CA		03/31/2004	5.750	1,724,681						3,000,000	01/20/2004
1488		FRESNO	CA		12/28/2004	5.900	2,159,629						3,850,000	11/23/2004
1493		FRESNO	CA		02/01/2005	5.875	542,003						1,400,000	12/17/2004
1523		FRESNO	CA		07/27/2005	5.700	555,770						850,000	04/20/2005
1541		FRESNO	CA		08/18/2005	5.500	868,395						1,800,000	06/22/2005
1543		FRESNO	CA		11/10/2005	5.920	1,939,633						7,125,000	07/14/2005
1560		FRESNO	CA		11/22/2005	5.500	586,569						925,000	09/01/2005
1586		FRESNO	CA		03/13/2006	5.840	1,206,048						5,260,000	01/04/2006
1617		FRESNO	CA		06/27/2006	6.690	987,707						1,550,000	05/09/2006
1623		FRESNO	CA		09/13/2006	6.580	2,361,182						7,000,000	05/30/2006
1639		FRESNO	CA		10/26/2006	6.385	777,130						1,350,000	08/30/2006
1670		FRESNO	CA		05/02/2007	6.150	3,334,683						6,500,000	03/08/2007
1695		FRESNO	CA		08/31/2007	6.660	1,058,326						1,500,000	08/03/2007
1696		FRESNO	CA		08/15/2007	6.300	2,112,216						3,500,000	05/14/2007
0889		GARDEN GROVE	CA		04/09/1998	7.750	599,458						2,320,000	10/17/1997
1806		GILROY	CA		09/19/2008	6.480	2,319,024						3,850,000	08/14/2008
1046		GOLETA	CA		08/18/1999	7.375	441,435						3,900,000	06/16/1999
1598		GRANADA HILLS	CA		04/19/2006	6.200	695,429						1,790,000	02/21/2006
0934		HALF MOON BAY	CA		08/27/1998	7.500	272,164						1,550,000	06/17/1998
1636		HEALDSBURG	CA		10/13/2006	6.250	2,194,594						4,400,000	08/18/2006
1810		HOLLISTER	CA		08/27/2008	6.320	3,941,258						8,300,000	07/28/2008
1240		HOLLYWOOD	CA		10/22/2001	7.750	542,662						1,640,000	07/18/2001
1346		HUNTINGTON BEACH	CA		01/02/2003	5.625	768,571						2,200,000	11/14/2002
1662		INDIO	CA		06/14/2007	6.100	1,768,408						2,860,000	04/20/2007
1681		INDIO	CA		07/17/2007	6.010	1,330,029						2,400,000	04/12/2007
1708		INDIO	CA		09/19/2007	6.400	2,646,352						4,300,000	06/04/2007
1845		INGLEWOOD	CA		01/12/2009	7.100	641,725						2,710,000	12/10/2008
0616		IRVINE	CA		05/23/2002	7.625	546,928						1,550,000	04/26/2002
1496		IRVINE	CA		03/08/2005	5.500	1,531,571						2,550,000	02/02/2005
1584		LA MESA	CA		03/15/2006	6.000	1,029,478						1,931,000	12/10/2005
1436		LAGUNA BEACH	CA		12/29/2003	6.000	877,143						2,600,000	11/04/2003
0931		LAGUNA NIGUEL	CA		10/06/1998	7.375	571,584						1,370,000	06/01/1998
1916		LAGUNA WOODS	CA		10/05/2009	7.650	2,229,964						3,750,000	09/16/2009
1603		LAKE FOREST	CA		05/17/2006	6.375	2,067,841						3,900,000	03/16/2006
0980		LAKEWOOD	CA		02/22/1999	7.250	317,197						1,060,000	12/10/1998
ASL 20142		LOS ANGELES	CA		06/05/1995	8.950	285,932						738,095	06/01/1995

E04.1



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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1378		LOS ANGELES	CA		04/24/2003	6.500	1,217,868						3,000,000	03/27/2003
1444		LOS ANGELES	CA		02/11/2004	6.250	495,684						1,300,000	12/15/2003
1519		LOS ANGELES	CA		06/23/2005	5.750	1,023,668						2,120,000	04/12/2005
1520		LOS ANGELES	CA		06/23/2005	5.750	727,955						1,840,000	04/12/2005
1838		LOS ANGELES	CA		01/30/2009	6.000	3,661,561						6,525,000	12/10/2008
1846		LOS ANGELES	CA		02/26/2009	6.050	2,378,773						8,300,000	12/01/2008
1933		LOS ANGELES	CA		12/16/2009	7.300	1,850,000						4,750,000	10/20/2009
1328		MADERA	CA		11/12/2002	6.750	472,799						3,000,000	09/03/2002
1683		MANTECA	CA		07/23/2007	6.360	1,150,779						2,410,000	06/04/2007
1847		MARINA DEL RAY	CA		02/26/2009	6.000	1,734,364						5,170,000	12/01/2008
1266		MILPITAS	CA		12/05/2001	7.375	2,293,067						8,200,000	09/28/2001
1712		MODESTO	CA		10/11/2007	6.500	2,363,689						4,800,000	08/24/2007
1878		MONROVIA	CA		09/29/2009	7.400	1,295,276						3,730,000	07/31/2009
1655		MONTCLAIR	CA		03/29/2007	6.125	4,167,910						8,800,000	02/15/2007
1779		MORGAN HILL	CA		05/23/2008	5.550	514,321						4,550,000	04/16/2008
1789		MORGAN HILL	CA		06/30/2008	6.570	976,274						3,360,000	06/02/2008
1215		N HIGHLANDS	CA		06/28/2001	7.625	635,962						1,595,000	04/24/2001
1761		NEWARK	CA		03/27/2008	5.950	1,810,961						3,310,000	01/28/2008
1745		NEWPORT BEACH	CA		02/01/2008	6.230	1,500,000						3,400,000	01/07/2008
1221		NORTHRIDGE	CA		08/08/2001	7.560	1,049,485						2,400,000	05/17/2001
1525		NORWALK	CA		07/30/2003	6.250	804,745						2,000,000	05/01/2003
0929		OCEANSIDE	CA		07/20/1998	7.500	365,499						1,525,000	05/20/1998
1609		OCEANSIDE	CA		05/31/2006	6.250	901,719						1,800,000	04/06/2006
1209		OXNARD	CA		06/14/2001	7.500	393,783						790,000	04/13/2001
1210		OXNARD	CA		06/14/2001	7.500	396,047						850,000	04/13/2001
1724		OXNARD	CA		11/02/2007	6.490	992,464						4,970,000	09/05/2007
0964		PACOIMA	CA		10/20/1998	7.000	738,881						3,000,000	09/16/1998
1605		PARAMOUNT	CA		06/22/2006	6.700	2,135,621						4,200,000	03/24/2006
1482		PASADENA	CA		11/10/2004	6.000	1,018,707						2,250,000	09/09/2004
1857		PASADENA	CA		06/11/2009	6.760	4,471,605						8,300,000	02/05/2009
1061		PLEASANTON	CA		09/20/1999	7.750	487,662						1,290,000	07/15/1999
1401		POMONA	CA		08/18/2003	5.500	3,572,775						6,150,000	06/16/2003
1723		POMONA	CA		10/31/2007	6.540	2,080,572						4,300,000	09/13/2007
1652		RANCHO CORDOVA	CA		01/18/2007	6.000	1,727,222						4,500,000	12/06/2006
1386		RANCHO CUCAMONGA	CA		05/29/2003	6.500	1,043,673						2,775,000	04/14/2003
1809		RANCHO CUCAMONGA	CA		10/02/2008	6.700	3,267,314						4,730,000	07/28/2008
1296		RANCHO DOMINGUEZ	CA		05/13/2002	6.750	933,344						3,100,000	03/08/2002
1472		REDONDO BEACH	CA		08/30/2004	6.500	647,889						2,850,000	06/29/2004
1739		REDWOOD CITY	CA		12/17/2007	6.650	5,130,250						10,500,000	11/27/2007
1892		RICHMOND	CA		08/31/2009	6.950	4,407,028						10,200,000	06/17/2009
0422		S PASADENA	CA		03/31/1988	6.500	659,396						4,000,000	12/23/1987
1540		SACRAMENTO	CA		03/14/2003	6.850	1,895,300						3,670,000	01/08/2003
1710		SACRAMENTO	CA		10/18/2007	5.920	1,201,438						1,700,000	08/21/2007
1717		SACRAMENTO	CA		09/26/2007	6.320	946,952						1,340,000	08/23/2007
1000		SALINAS	CA		04/14/1999	6.625	570,325						2,500,000	01/21/1999
1620		SALINAS	CA		08/11/2006	6.695	3,302,865						6,300,000	05/23/2006
0640		SAN DIEGO	CA		05/26/1993	7.500	142,413						4,600,000	04/26/1993
1297		SAN DIEGO	CA		11/12/1998	7.500	1,097,601						2,550,000	02/28/2002
1374		SAN DIEGO	CA		05/13/2003	5.750	545,530						1,750,000	03/11/2003
1385		SAN DIEGO	CA		05/22/2003	6.500	240,832						775,000	04/14/2003
1454		SAN DIEGO	CA		05/11/2004	6.375	502,832						2,085,000	03/12/2004
1497		SAN DIEGO	CA		04/04/2005	6.450	2,987,304						5,200,000	02/15/2005
1498		SAN DIEGO	CA		04/05/2005	4.925	2,149,507						4,700,000	02/15/2005
1599		SAN DIEGO	CA		04/25/2006	5.880	3,624,546						6,500,000	02/27/2006
1679		SAN DIEGO	CA		06/04/2007	7.500	961,894						4,700,000	02/15/2005
1781		SAN DIEGO	CA		05/09/2008	5.750	1,960,801						3,300,000	04/29/2008
1939		SAN DIEGO	CA		12/17/2009	6.750	4,700,000						10,640,000	11/10/2009
1478		SAN DIMAS	CA		10/21/2004	6.525	1,066,515						2,260,000	08/24/2004
1811		SAN FRANCISCO	CA		09/18/2008	5.880	1,300,000						3,300,000	07/28/2008
1841		SAN FRANCISCO	CA		12/24/2008	7.130	2,243,530						3,700,000	12/04/2008
1089		SAN JOSE	CA		01/11/2000	8.125	616,947						2,300,000	10/27/1999
1475		SAN JOSE	CA		09/24/2004	6.250	1,015,967						3,100,000	07/22/2004

E04.2

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1624		SAN JOSE	CA		07/31/2006	6.530	2,069,869						3,350,000	05/31/2006
1709		SAN JOSE	CA		08/30/2007	6.220	1,055,603						3,560,000	07/13/2007
1750		SAN JOSE	CA		02/13/2008	6.000	2,738,635						6,000,000	01/10/2008
1776		SAN JOSE	CA		05/16/2008	5.610	3,968,592						27,150,000	04/16/2008
1821		SAN JOSE	CA		11/10/2008	6.620	4,811,811						16,400,000	09/22/2008
1870		SAN MATEO	CA		05/21/2009	6.300	8,153,872						19,100,000	04/22/2009
1505		SANTA ANA	CA		08/10/2005	5.375	5,434,286						10,350,000	03/11/2005
1692		SANTA ANA	CA		08/09/2007	7.000	625,691						1,750,000	05/03/2007
1727		SANTA ANA	CA		10/22/2007	6.370	1,889,402						3,100,000	09/11/2007
1400		SANTA BARBARA	CA		07/31/2003	6.000	765,227						2,815,000	06/11/2003
0771		SANTA CLARA	CA		06/26/1996	8.375	135,373						1,235,000	04/18/1996
1850		SANTA CLARA	CA		02/03/2009	6.250	3,548,050						7,700,000	12/02/2008
1851		SANTA CLARA	CA		02/04/2009	6.250	2,722,690						5,000,000	12/02/2008
1852		SANTA CLARA	CA		02/04/2009	6.250	2,069,133						3,800,000	12/02/2008
1873		SANTA CLARA	CA		05/14/2009	6.750	2,745,266						7,500,000	04/20/2009
0858		SANTA FE SPGS	CA		07/29/1997	8.500	103,583						720,000	06/18/1997
1702		SANTA MONICA	CA		09/20/2007	6.330	2,191,655						7,700,000	07/25/2007
1703		SANTA MONICA	CA		09/20/2007	6.330	1,461,103						4,300,000	07/25/2007
1834		SANTA MONICA	CA		11/25/2008	6.650	1,879,315						6,650,000	11/03/2008
1848		SANTA MONICA	CA		01/29/2009	6.000	2,078,183						8,560,000	11/20/2008
1849		SANTA MONICA	CA		01/29/2009	6.000	1,237,010						7,240,000	11/30/2008
0641		SANTEE	CA		06/17/1993	6.375	226,960						1,000,000	04/28/1993
0983		SHERMAN OAKS	CA		03/31/1999	7.500	196,911						650,000	12/11/1998
1282		SIGNAL HILL	CA		04/04/2002	7.500	701,862						1,900,000	12/17/2001
1407		SIMI VALLEY	CA		09/18/2003	6.100	801,358						1,860,000	07/17/2003
1569		SUNNYVALE	CA		12/28/2005	5.750	921,003						3,100,000	10/18/2005
1924		SUNNYVALE	CA		12/31/2009	6.750	3,025,000						5,430,000	09/30/2009
1247		TARZANA	CA		12/18/2001	7.500	1,037,571						2,000,000	08/03/2001
1430		THOUSAND OAKS	CA		02/18/2004	6.375	1,969,187						5,600,000	10/10/2003
1720		THOUSAND OAKS	CA		11/15/2007	5.810	1,582,396						3,030,000	09/07/2007
1119		THOUSAND PLMS	CA		05/30/2000	5.125	1,435,041						2,950,000	03/23/2000
0939		TORRANCE	CA		07/30/1998	7.500	479,667						1,100,000	07/17/1998
1433		TURLOCK	CA		07/30/1997	7.875	5,185,331						12,500,000	04/29/1997
1434		TURLOCK	CA		08/14/2000	8.650	495,236						1,230,000	05/25/2000
1791		TURLOCK	CA		06/25/2008	6.000	2,947,356						5,220,000	05/23/2008
1406		TUSTIN	CA		08/28/2003	5.750	459,620						850,000	07/01/2003
1839		UNION CITY	CA		12/03/2008	6.650	2,758,355						9,940,000	11/13/2008
1246		VALENCIA	CA		12/18/2001	7.500	1,647,479						3,230,000	08/03/2001
0455		VAN NUYS	CA		10/04/1988	5.875	391,818						2,400,000	09/20/1988
1697		VAN NUYS	CA		09/12/2007	6.490	1,509,130						2,900,000	07/25/2007
1927		VAN NUYS	CA		12/03/2009	6.820	2,830,000						5,800,000	11/09/2009
1700		VENICE	CA		09/20/2007	6.330	745,139						7,300,000	07/25/2007
1701		VENICE	CA		09/20/2007	6.330	2,776,085						13,200,000	07/25/2007
1830		VISALIA	CA		12/15/2008	5.950	2,965,680						7,000,000	10/20/2008
1880		WALNUT	CA		07/06/2009	7.650	2,673,391						4,230,000	05/19/2009
1527		WEST SACRAMENTO	CA		06/30/2005	5.640	893,485						3,250,000	04/29/2005
1758		WESTLAKE VILLAGE	CA		03/26/2008	6.200	2,743,565						8,210,000	01/10/2008
0890		WOODLAND	CA		01/05/1998	7.750	440,827						1,200,000	10/20/1997
0764		YORBA LINDA	CA		04/03/1996	8.125	246,976						1,000,000	03/08/1996
1184		ARVADA	CO		05/23/2001	6.250	1,182,699						1,835,000	03/15/2001
1387		ARVADA	CO		06/20/2003	5.125	1,084,717						2,800,000	04/17/2003
1526		ARVADA	CO		06/20/2005	5.700	1,129,245						2,340,000	04/20/2005
1439		AURORA	CO		02/18/2004	6.500	3,966,060						6,700,000	12/03/2003
1494		AURORA	CO		03/08/2005	5.875	973,503						1,900,000	01/05/2005
0994		BOULDER	CO		03/26/1999	6.100	849,953						2,100,000	01/13/1999
1183		BOULDER	CO		02/28/2001	5.750	622,846						2,650,000	12/28/2000
1195		BOULDER	CO		04/10/2001	6.250	615,963						1,350,000	03/20/2001
1455		BOULDER	CO		05/20/2004	5.750	1,456,012						3,324,000	03/16/2004
1682		CENTENNIAL	CO		08/20/2007	6.610	1,635,131						3,100,000	06/15/2007
1716		CENTENNIAL	CO		11/14/2007	6.190	1,711,085						3,350,000	08/28/2007
0821		COLORADO SPGS	CO		04/17/1997	8.125	1,212,468						3,110,029	02/02/1997
1828		COLORADO SPRINGS	CO		11/19/2008	6.650	2,176,054						3,800,000	09/19/2008

E04.3

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1062		COMMERCE CITY	CO		09/13/1999	6.500	342,765						915,000	07/15/1999
1227		DENVER	CO		08/14/2001	7.625	1,356,820						3,640,000	05/30/2001
1353		DENVER	CO		02/25/2003	5.500	1,193,343						2,125,000	12/19/2002
1408		DENVER	CO		09/26/2003	5.850	2,158,857						3,825,000	07/22/2003
1463		DENVER	CO		07/01/2004	6.000	2,002,373						3,950,000	04/27/2004
1656		DENVER	CO		02/23/2007	6.000	2,491,530						6,700,000	12/03/2003
1077		ENGLEWOOD	CO		11/30/1999	6.250	1,264,454						2,440,000	09/23/1999
1350		ENGLEWOOD	CO		02/18/2003	6.375	949,781						1,650,000	12/10/2002
1396		ENGLEWOOD	CO		08/22/2003	6.125	1,329,320						2,260,000	06/05/2003
1612		ENGLEWOOD	CO		07/11/2006	6.600	823,622						1,450,000	04/25/2006
1201		GOLDEN	CO		04/19/2001	7.250	390,903						1,450,000	03/23/2001
1301		LAKEWOOD	CO		06/17/2002	7.700	1,504,085						3,165,000	04/04/2002
1495		LAKEWOOD	CO		03/24/2005	5.850	583,778						1,720,000	01/20/2005
0914		LITTLETON	CO		08/24/1998	7.500	627,977						1,600,000	02/27/1998
0938		LITTLETON	CO		09/18/1998	6.625	1,131,360						3,175,800	07/16/1998
1071		LITTLETON	CO		11/09/1999	5.810	628,685						1,360,000	08/27/1999
1285		LITTLETON	CO		03/06/2002	6.750	801,317						1,730,000	01/22/2002
1376		LITTLETON	CO		05/20/2003	6.250	1,437,453						2,600,000	03/21/2003
1504		LITTLETON	CO		05/05/2005	5.710	625,334						1,200,000	03/11/2005
1325		LOUISVILLE	CO		02/28/2003	5.500	3,397,879						5,970,000	12/16/2002
1223		WESTMINSTER	CO		07/25/2001	7.625	827,702						1,530,000	05/24/2001
1827		DANBURY	CT		10/14/2008	6.500	3,333,628						4,500,000	08/18/2008
1759		WASHINGTON	DC		03/14/2008	5.750	978,118						1,860,000	01/18/2008
1911		NEWARK	DE		11/03/2009	7.000	1,200,000						2,520,000	09/09/2009
1762		BOCA RATON	FL		04/07/2008	6.625	2,722,623						9,200,000	01/18/2008
1738		CLEARWATER	FL		12/14/2007	6.500	2,422,682						4,100,000	11/12/2007
1752		JACKSONVILLE	FL		01/03/2008	6.250	965,666						1,600,000	12/07/2007
1763		JACKSONVILLE	FL		03/18/2008	6.250	1,568,047						2,635,000	01/28/2008
1799		JACKSONVILLE	FL		08/01/2008	6.710	1,523,030						2,150,000	06/30/2008
1452		MIAMI	FL		03/30/2004	5.750	2,463,822						6,000,000	02/02/2004
1687		OCALA	FL		08/15/2007	6.920	1,085,007						1,615,000	07/16/2007
1258		ORANGE CITY	FL		12/28/2001	7.375	949,240						2,800,000	09/14/2001
1664		ORLANDO	FL		05/15/2007	6.280	613,999						1,700,000	04/23/2007
1742		ORLANDO	FL		01/28/2008	6.500	923,007						1,400,000	12/18/2007
1743		ORLANDO	FL		02/05/2008	6.500	2,359,652						3,635,000	11/27/2007
1744		ORLANDO	FL		12/17/2007	6.420	3,976,695						5,800,000	12/04/2007
1754		ORLANDO	FL		02/05/2008	6.150	1,387,506						2,200,000	01/15/2008
1618		WINTER HAVEN	FL		07/31/2006	6.260	938,581						2,025,000	05/16/2006
1869		ATLANTA	GA		06/01/2009	7.060	9,430,198						18,300,000	04/09/2009
1904		ATLANTA	GA		08/31/2009	6.250	4,456,069						7,630,000	07/22/2009
1705		BOGART	GA		09/17/2007	6.635	3,873,586						8,600,000	09/03/2007
1824		COLLEGE PARK	GA		10/24/2008	6.950	2,142,527						5,700,000	09/17/2008
1621		LOCUST GROVE	GA		07/10/2006	6.750	1,131,179						2,000,000	05/24/2006
1925		MARIETTA	GA		12/28/2009	7.350	2,575,000						4,425,000	10/16/2009
1872		KAHULUI	HI		05/15/2009	7.850	1,979,119						5,710,000	10/14/2008
0967		BOISE	ID		12/03/1998	7.625	1,013,462						2,612,000	10/05/1998
1311		BOISE	ID		08/27/2002	7.700	1,966,558						5,148,000	05/22/2002
1451		BOISE	ID		05/13/2004	6.500	1,475,694						3,345,000	01/30/2004
1714		BOISE	ID		10/17/2007	6.240	1,925,769						3,280,000	09/15/2007
0954		COEUR D'ALENE	ID		11/19/1998	6.650	493,056						1,300,000	09/03/1998
1928		COEUR DALENE	ID		12/03/2009	6.870	3,000,000						5,100,000	09/26/2009
1790		CENTREVILLE	IL		06/30/2008	6.450	4,336,483						10,175,000	05/27/2008
1874		HOFFMAN ESTATES	IL		06/11/2009	7.910	994,797						2,700,000	05/19/2009
0775		INDIANAPOLIS	IN		08/26/1996	8.500	562,760						4,300,000	05/01/1996
0984		INDIANAPOLIS	IN		04/09/1999	7.125	1,062,291						2,360,000	12/22/1998
1953		INDIANAPOLIS	IN		12/30/2009	6.600	8,000,000						15,700,000	12/22/2009
1831		MARION	IN		11/14/2008	6.800	2,066,825						2,800,000	10/02/2008
1501		MISHAWAKA	IN		05/04/2005	5.250	1,070,600						1,800,000	03/04/2005
1485		PORTAGE	IN		12/14/2004	5.125	2,190,748						3,700,000	10/20/2004
1628		FLORENCE	KY		08/14/2006	6.480	1,157,568						1,790,000	06/14/2006
1192		LOUISVILLE	KY		05/18/2001	7.800	897,815						1,660,000	03/05/2001
1070		AYER	MA		11/24/1999	7.750	5,924,939						12,000,000	08/25/1999

E04.4

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1764		DEVENS	MA		03/14/2008	6.200	668,881						1,900,000	02/12/2008
1931		BALTIMORE	MD		12/28/2009	7.375	6,000,000						11,450,000	11/16/2009
1595		EDGEWATER	MD		03/29/2006	5.850	3,433,020						5,900,000	01/30/2006
1389		GAITHERSBURG	MD		06/24/2003	6.500	873,082						1,810,000	04/28/2003
1506		BRIGHTON	MI		05/12/2005	5.710	2,846,432						4,400,000	03/15/2005
1734		CANTON TOWNSHIP	MI		11/14/2007	6.190	928,705						1,910,000	08/24/2007
1212		GRANDVILLE	MI		06/26/2001	7.375	169,206						1,800,000	04/19/2001
1842		NOVI	MI		01/22/2009	6.500	2,153,534						4,750,000	12/25/2008
1794		PAW PAW	MI		08/27/2008	6.375	1,254,497						1,850,000	07/29/2008
1793		PLAINWELL	MI		07/23/2008	6.110	2,510,592						3,665,000	06/18/2008
1305		ROMULUS	MI		07/16/2002	7.625	837,332						1,900,000	04/12/2002
1833		ROYAL OAK	MI		11/21/2008	6.000	1,325,937						3,250,000	11/10/2008
1735		SHELBY TOWNSHIP	MI		11/20/2007	6.190	772,620						1,580,000	08/21/2007
1653		TRAVERSE CITY	MI		02/20/2007	5.945	914,982						1,625,000	01/12/2007
1921		WARREN	MI		11/04/2009	6.625	532,798						2,100,000	06/01/2003
1409		WESTLAND	MI		09/19/2003	6.100	758,702						1,650,000	07/24/2003
1607		WESTLAND	MI		05/26/2006	6.250	722,738						2,300,000	03/30/2006
1556		BLOOMINGTON	MIN		10/24/2005	5.700	876,491						2,300,000	08/21/2005
1768		BURNSVILLE	MIN		04/11/2008	5.650	3,486,884						5,850,000	03/25/2008
1538		CAMBRIDGE	MIN		07/12/2005	5.400	1,120,911						1,680,000	05/26/2005
1769		DILWORTH	MIN		04/11/2008	5.650	2,603,537						6,000,000	03/31/2008
1909		EDEN PRAIRIE	MIN		11/03/2009	7.000	2,000,000						4,200,000	09/09/2009
1719		ELK RIVER	MIN		10/12/2007	6.150	1,179,204						1,950,000	10/05/2007
1613		GOLDEN VALLEY	MIN		08/03/2006	6.600	1,368,815						2,000,000	04/21/2006
1630		GREENWOOD	MIN		08/10/2006	6.550	942,500						1,500,000	07/07/2006
1441		ROBBINSDALE	MIN		03/12/2004	7.670	2,302,735						12,611,300	12/10/2003
1654		ROGERS	MIN		02/22/2007	6.200	2,755,126						4,275,000	12/28/2006
1663		SAUK RAPIDS	MIN		04/11/2007	6.055	1,113,875						2,280,000	01/05/2007
1770		SHAKOPEE	MIN		04/25/2008	6.000	4,658,579						8,400,000	03/28/2008
1753		SHOREVIEW	MIN		01/25/2008	5.700	1,929,715						3,900,000	12/27/2007
1660		ST LOUIS PARK	MIN		04/16/2007	6.400	1,396,265						2,190,000	03/25/2007
1749		ST MICHAEL	MIN		04/15/2008	6.250	2,251,838						3,500,000	01/25/2008
1169		ST PAUL	MIN		10/30/2000	8.625	543,962						1,900,000	10/06/2000
1509		ST PAUL	MIN		05/19/2005	5.875	746,358						1,450,000	03/17/2005
1576		WHITE BEAR LAKE	MIN		02/21/2006	6.000	1,002,741						1,900,000	11/21/2005
1377		KANSAS CITY	MO		06/09/2003	6.200	817,918						2,180,000	03/26/2003
1917		ST CHARLES	MO		10/19/2009	6.850	4,483,960						10,450,000	09/29/2009
1122		GULFPORT	MS		05/16/2000	8.500	1,255,756						2,915,000	04/04/2000
1669		HORN LAKE	MS		05/30/2007	6.150	909,260						1,900,000	04/25/2007
1668		OLIVE BRANCH	MS		05/30/2007	6.150	836,128						1,900,000	04/25/2007
1667		OXFORD	MS		05/30/2007	6.150	926,800						1,950,000	04/25/2007
1722		BOZEMAN	MT		10/22/2007	6.480	1,311,257						2,940,000	09/07/2007
1910		GREENSBORO	NC		11/03/2009	7.000	1,800,000						3,660,000	09/09/2009
1544		MATTHEWS	NC		09/14/2005	5.625	1,114,185						2,431,000	07/18/2005
1017		ROCKY MOUNT	NC		06/28/1999	7.250	1,070,657						2,400,000	03/23/1999
1559		WAYNEVILLE	NC		04/14/2004	5.940	4,666,986						7,200,000	03/15/2004
1491		BELLEVUE	NE		01/20/2005	6.000	747,697						1,320,000	12/03/2004
1508		GRAND ISLAND	NE		04/26/2005	5.875	2,927,124						4,500,000	03/17/2005
1083		LINCOLN	NE		12/01/1999	8.000	1,508,201						4,550,000	09/30/1999
1632		LINCOLN	NE		10/12/2006	6.250	943,408						2,885,000	07/25/2006
1170		OMAHA	NE		12/20/2000	8.625	357,990						850,000	10/17/2000
1748		OMAHA	NE		01/28/2008	6.080	1,184,217						2,675,000	12/04/2007
1588		ALBUQUERQUE	NM		03/21/2006	5.920	3,125,681						15,250,000	01/10/2006
1715		GARDNERVILLE	NV		10/04/2007	6.120	2,904,543						6,050,000	09/24/2007
0910		LAS VEGAS	NV		05/07/1998	7.375	513,140						1,167,000	02/12/1998
1535		LAS VEGAS	NV		07/06/2005	5.750	648,753						2,190,000	05/17/2005
1571		LAS VEGAS	NV		02/02/2006	5.960	1,947,148						3,000,000	10/31/2005
1665		LAS VEGAS	NV		05/02/2007	5.900	1,236,382						2,400,000	02/20/2007
1876		LAS VEGAS	NV		06/11/2009	6.780	1,991,691						3,670,000	05/01/2009
1473		NORTH LAS VEGAS	NV		08/19/2004	6.750	1,192,810						2,430,000	07/21/2004
1950		RENO	NV		12/30/2009	6.950	2,500,000						5,000,000	12/15/2009
1951		RENO	NV		12/30/2009	6.950	3,500,000						5,890,000	12/15/2009

E04.5

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1814		SPARKS	NV		08/27/2008	6.710	1,590,241						3,925,000	08/05/2008
1922		BUFFALO	NY		12/08/2009	6.800	5,250,000						8,350,000	09/29/2009
1923		TONOWANDA	NY		12/11/2009	6.800	7,475,000						12,900,000	10/02/2009
1314		BEACHWOOD	OH		09/30/2002	7.500	1,073,870						2,000,000	06/12/2002
1882		COLUMBUS	OH		07/30/2009	7.250	5,466,022						18,650,000	06/24/2009
1788		DAYTON	OH		06/16/2008	6.810	733,073						1,300,000	04/24/2008
1737		FAIRBORN	OH		11/16/2007	6.750	617,035						1,285,000	10/26/2007
1354		MIAMI SBURG	OH		03/10/2003	5.500	2,025,093						3,620,000	01/06/2003
1787		SPRINGFIELD	OH		06/16/2008	7.060	733,711						1,300,000	04/24/2008
1936		TALLMADGE	OH		12/28/2009	7.050	5,165,000						9,880,000	11/06/2009
1774		OKLAHOMA CITY	OK		04/23/2008	5.950	1,176,743						2,500,000	03/20/2008
1568		TULSA	OK		12/27/2005	5.750	1,588,810						2,550,000	10/07/2005
1634		TULSA	OK		09/15/2006	6.470	1,645,155						2,877,000	08/02/2006
1675		TULSA	OK		07/09/2007	6.255	2,060,462						3,000,000	06/13/2007
1085		BEAVERTON	OR		02/17/2000	5.500	1,041,156						1,680,000	10/14/1999
1315		BEND	OR		08/19/2002	6.500	647,483						1,175,000	06/25/2002
1524		BEND	OR		06/23/2005	5.750	866,032						1,820,000	04/19/2005
1570		BEND	OR		08/12/2003	6.125	482,961						1,090,000	06/24/2003
1530		CLACKAMAS	OR		06/30/2005	5.750	866,033						2,100,000	05/05/2005
1635		CLACKAMAS	OR		09/29/2006	6.700	343,478						2,100,000	08/17/2006
1707		CLACKAMAS	OR		09/24/2007	6.450	1,973,294						2,925,000	08/29/2007
1456		CORVALLIS	OR		05/25/2004	5.775	1,986,671						3,600,000	03/29/2004
1944		HILLSBORO	OR		12/11/2009	6.650	5,200,000						12,680,000	11/18/2009
1269		HILLSBORO	OR		12/12/2001	7.000	5,483,909						11,000,000	10/15/2001
1384		HILLSBORO	OR		06/27/2003	6.000	809,909						2,270,000	04/10/2003
1416		HILLSBORO	OR		10/10/2003	6.250	2,311,799						4,850,000	08/08/2003
1775		HILLSBORO	OR		05/13/2008	5.450	2,717,731						4,300,000	03/26/2008
1945		HILLSBORO	OR		12/11/2009	6.650	6,480,000						14,420,000	11/18/2009
1946		HILLSBORO	OR		12/11/2009	6.650	1,450,000						4,940,000	11/18/2009
1947		HILLSBORO	OR		12/11/2009	6.650	3,250,000						6,540,000	11/18/2009
1948		HILLSBORO	OR		12/11/2009	6.650	2,520,000						5,270,000	11/18/2009
1756		LAKE OSWEGO	OR		03/28/2008	6.250	2,198,365						3,610,000	01/31/2008
1371		MILWAUKIE	OR		04/18/2003	5.625	946,445						5,815,000	02/27/2003
1403		MILWAUKIE	OR		08/11/2003	6.050	600,924						1,100,000	06/17/2003
1197		ONTARIO	OR		06/21/2001	7.750	2,000,254						17,250,000	03/22/2001
1832		OREGON CITY	OR		12/05/2008	6.250	2,312,264						5,130,000	11/22/2008
0827		PORTLAND	OR		03/28/1997	8.500	279,224						960,000	02/25/1997
1402		PORTLAND	OR		08/11/2003	6.050	655,904						1,380,000	06/17/2003
1427		PORTLAND	OR		11/24/2003	5.250	2,978,848						4,800,000	09/18/2003
1462		PORTLAND	OR		06/22/2004	5.750	822,339						2,570,000	04/22/2004
1666		PORTLAND	OR		05/29/2007	6.250	1,146,140						2,020,000	03/14/2007
1685		PORTLAND	OR		07/20/2007	6.680	1,032,909						1,750,000	06/01/2007
1729		PORTLAND	OR		10/24/2007	6.500	1,687,444						2,450,000	09/25/2007
1816		PORTLAND	OR		10/24/2008	6.750	973,268						2,040,000	08/27/2008
1884		PORTLAND	OR		07/30/2009	7.100	3,483,071						5,750,000	06/25/2009
1887		PORTLAND	OR		08/11/2009	6.750	2,054,666						5,090,000	06/10/2009
1888		PORTLAND	OR		08/11/2009	6.750	1,138,728						1,960,000	06/10/2009
1889		PORTLAND	OR		08/11/2009	6.750	1,064,466						1,930,000	06/08/2009
1890		PORTLAND	OR		08/11/2009	6.750	693,139						1,710,000	06/08/2009
1251		SALEM	OR		10/31/2001	7.500	988,222						2,075,000	08/22/2001
1326		SALEM	OR		10/31/2001	7.500	1,900,481						4,000,000	08/22/2001
1327		SALEM	OR		12/21/2001	7.500	1,609,949						2,875,000	08/22/2001
1690		SALEM	OR		08/29/2007	6.520	1,038,247						1,440,000	07/12/2007
1786		SALEM	OR		07/30/2008	7.303	6,616,828						11,430,000	04/15/2008
1580		TROUTDALE	OR		02/23/2006	5.825	2,823,934						7,260,000	12/09/2005
1101		TUALATIN	OR		02/01/2000	8.125	2,495,869						4,100,000	12/13/1999
1372		TUALATIN	OR		04/29/2003	5.650	1,508,281						3,050,000	03/11/2003
1601		WILSONVILLE	OR		05/11/2006	6.000	1,539,191						2,815,000	03/15/2006
1591		INDIANA	PA		04/27/2006	6.077	1,076,990						2,000,000	01/26/2006
1658		MALVERN	PA		04/11/2007	6.400	1,182,158						1,900,000	01/26/2007
1600		PHILIPSBURG	PA		06/05/2006	6.430	2,211,571						5,200,000	03/13/2006
ASL 20145		PITTSBURGH	PA		07/20/1995	8.610	234,711						720,430	07/01/1995

E04.6

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1104		PITTSBURGH	PA		02/01/2000	5.870	13,420,661						33,500,000	01/19/2000
1558		CAMDEN	SC		11/10/2005	5.850	3,736,826						6,600,000	08/25/2005
1500		CHARLESTON	SC		05/04/2005	5.650	2,622,398						4,400,000	03/02/2005
1313		COLUMBIA	SC		09/05/2002	6.500	5,108,855						9,430,000	06/06/2002
1213		ABERDEEN	SD		06/14/2001	7.500	211,941						1,400,000	04/23/2001
1898		SIOUX FALLS	SD		09/11/2009	6.720	2,384,516						4,750,000	07/28/2009
1626		LIVINGSTON	TN		07/26/2006	6.630	1,836,241						2,800,000	05/31/2006
1648		MEMPHIS	TN		02/08/2007	6.050	4,569,819						11,500,000	11/21/2006
1563		MURFREESBORO	TN		10/21/2005	5.750	815,693						1,285,000	09/15/2005
1625		MURFREESBORO	TN		07/21/2006	6.630	3,437,089						5,200,000	05/31/2006
1557		NASHVILLE	TN		11/18/2005	5.625	839,008						1,300,000	08/25/2005
1143		AUSTIN	TX		10/18/2000	8.530	548,325						4,000,000	06/23/2000
1349		AUSTIN	TX		03/31/2003	6.500	631,059						1,400,000	12/04/2002
1510		AUSTIN	TX		05/05/2005	5.750	590,173						1,000,000	03/17/2005
1686		AUSTIN	TX		07/20/2007	6.340	1,678,012						2,425,000	06/25/2007
1765		AUSTIN	TX		04/01/2008	6.000	3,587,907						5,700,000	02/15/2008
1801		AUSTIN	TX		09/12/2008	6.100	1,222,449						1,725,000	07/17/2008
1815		AUSTIN	TX		09/19/2008	6.600	5,738,280						9,300,000	08/12/2008
1863		AUSTIN	TX		04/29/2009	6.650	2,484,878						4,850,000	03/05/2009
1638		CARROLLTON	TX		10/25/2006	6.580	497,974						870,000	08/30/2006
1461		COLLEGE STATION	TX		06/23/2004	7.000	1,804,761						3,050,000	04/19/2004
1726		COLLEGE STATION	TX		10/09/2007	6.590	1,451,912						3,340,000	09/17/2007
1823		CORPUS CHRISTI	TX		12/01/2008	6.150	3,930,295						5,500,000	10/08/2008
1108		DALLAS	TX		07/31/1997	8.750	299,870						800,000	02/03/2000
1109		DALLAS	TX		07/31/1997	8.750	656,199						1,500,000	02/03/2000
1141		DALLAS	TX		08/31/2000	8.440	1,636,269						3,000,000	06/14/2000
1166		DALLAS	TX		12/14/2000	6.625	990,665						2,000,000	09/25/2000
1310		DALLAS	TX		07/22/2002	7.000	11,465,626						19,950,000	05/20/2002
1361		DALLAS	TX		04/15/2003	6.500	2,435,614						5,410,000	01/14/2003
1611		DALLAS	TX		06/19/2006	6.420	3,753,278						7,000,000	05/11/2006
1661		DALLAS	TX		05/16/2007	6.065	1,144,709						3,550,000	04/20/2007
1792		EL PASO	TX		07/24/2008	7.050	1,151,999						1,650,000	06/23/2008
1680		FLOWER MOUND	TX		06/29/2007	5.955	1,933,799						3,075,000	06/18/2007
1476		FORT WORTH	TX		09/29/2004	6.750	980,600						1,570,000	07/30/2004
1678		FORT WORTH	TX		08/10/2007	6.375	1,010,530						1,500,000	06/25/2007
1844		GRAND PRAIRIE	TX		01/23/2009	7.550	1,226,581						2,190,000	11/26/2008
1344		GRAPEVINE	TX		12/26/2002	6.625	5,920,799						13,900,000	10/29/2002
1731		HOUSTON	TX		11/01/2007	6.510	1,131,491						2,400,000	09/19/2007
1741		HOUSTON	TX		12/03/2007	6.375	1,447,253						3,150,000	11/13/2007
1868		HOUSTON	TX		06/17/2009	7.130	2,186,943						6,140,000	05/26/2009
1871		HOUSTON	TX		05/27/2009	6.770	3,140,640						5,500,000	03/18/2009
1905		HOUSTON	TX		08/31/2009	6.340	5,962,128						9,975,000	07/17/2009
1642		IRVING	TX		12/14/2006	5.905	7,987,135						13,000,000	09/28/2006
1913		IRVING	TX		12/17/2009	6.370	4,600,000						7,800,000	08/20/2009
1751		LEWISVILLE	TX		01/10/2008	5.860	5,919,042						9,500,000	11/29/2007
1222		LUBBOCK	TX		08/15/2001	7.750	2,634,442						6,000,000	05/17/2001
1796		LUBBOCK	TX		07/22/2008	6.930	3,916,480						8,250,000	06/10/2008
1725		ODESSA	TX		10/09/2007	6.540	1,345,415						3,090,000	09/17/2007
1883		PASADENA	TX		07/08/2009	6.625	3,388,111						6,200,000	06/03/2009
1736		PEARSALL	TX		11/14/2007	6.190	682,873						1,340,000	08/28/2007
1614		PLANO	TX		10/09/1999	6.500	6,907,247						13,700,000	07/09/1999
1812		PLANO	TX		11/13/2008	7.000	1,659,510						3,500,000	06/20/2008
1858		PLANO	TX		02/27/2009	6.300	3,738,266						5,860,000	01/23/2009
1829		ROUND ROCK	TX		11/21/2008	5.800	2,961,708						6,750,000	11/03/2008
1684		SAGINAW	TX		07/18/2007	6.325	1,653,876						2,440,000	02/09/2007
1048		SAN ANGELO	TX		08/23/1999	5.800	712,584						2,760,000	06/21/1999
1277		SAN ANTONIO	TX		01/25/2002	7.625	2,467,258						5,860,000	11/21/2001
1352		SAN ANTONIO	TX		02/10/2003	5.375	657,333						1,380,000	12/12/2002
1651		CENTERVILLE	UT		01/30/2007	6.125	1,823,629						2,600,000	01/23/2007
1318		LOGAN	UT		09/17/2002	6.500	777,415						1,450,000	07/12/2002
1067		OREM	UT		12/14/1999	7.500	351,635						1,050,000	08/13/1999
1417		OREM	UT		10/16/2003	6.375	2,039,734						3,360,000	08/18/2003

E04.7

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1445		OREM	UT		02/11/2004	6.250	2,057,022						3,570,000	12/16/2003
1123		PROVO	UT		06/15/2000	8.125	1,451,360						2,700,000	04/07/2000
1437		PROVO	UT		12/29/2003	5.250	1,125,026						2,225,000	11/12/2003
1561		PROVO	UT		10/31/2005	5.100	479,692						1,150,000	09/14/2005
1602		ROY	UT		04/07/2006	6.250	1,680,268						2,800,000	03/16/2006
0863		SALT LAKE CITY	UT		09/05/1997	8.250	461,148						1,250,000	08/01/1997
1175		SALT LAKE CITY	UT		01/03/2001	7.850	1,720,166						3,200,000	11/03/2000
1411		SALT LAKE CITY	UT		09/26/2003	6.125	606,620						1,370,000	07/31/2003
1803		SALT LAKE CITY	UT		08/27/2008	7.030	980,670						1,875,000	08/05/2008
1383		SPANISH FORK	UT		05/01/2003	6.375	681,206						1,400,000	04/08/2003
1418		SPRINGVILLE	UT		09/30/2003	6.375	995,874						1,755,000	08/19/2003
1777		ST GEORGE	UT		06/12/2008	6.250	1,658,278						2,450,000	04/07/2008
0953		MARTINSVILLE	VA		09/25/1998	6.875	8,450,346						16,450,000	08/31/1998
1596		MERRIFIELD	VA		05/03/2006	5.920	6,975,175						11,200,000	02/01/2006
1513		MIDLOTHIAN	VA		06/01/2005	6.125	789,148						1,475,000	03/29/2005
1554		SPOTSVLVANIA	VA		12/16/2005	5.885	3,094,759						5,000,000	08/18/2005
1902		VIENNA	VA		09/21/2009	7.940	6,187,020						10,900,000	07/12/2009
1279		AUBURN	WA		01/30/2002	7.500	1,461,959						3,175,000	12/12/2001
1713		BELFAIR	WA		09/21/2007	6.300	2,873,127						6,200,000	09/14/2007
1202		BELLEVUE	WA		05/31/2001	7.250	1,458,957						3,515,000	03/30/2001
1268		BELLEVUE	WA		12/10/2001	7.000	1,286,852						2,430,000	10/11/2001
1593		BELLEVUE	WA		05/21/1999	6.000	2,123,931						7,775,000	04/22/1999
1594		BELLEVUE	WA		05/24/2005	6.000	1,821,461						12,500,000	04/01/2005
1619		BELLEVUE	WA		07/19/2006	6.400	2,772,304						7,140,000	05/18/2006
1646		BELLEVUE	WA		12/21/2006	6.260	612,721						1,800,000	11/07/2006
1694		BELLEVUE	WA		08/20/2007	6.560	5,818,280						9,500,000	07/03/2007
1582		BELLINGHAM	WA		04/18/2006	5.740	2,159,213						4,000,000	12/28/2005
1604		CHENEY	WA		05/01/2006	6.210	1,959,553						3,800,000	03/21/2006
1780		EDMONDS	WA		05/15/2008	5.875	3,236,793						5,000,000	04/02/2008
1929		EDMONDS	WA		12/18/2009	6.250	4,350,000						8,950,000	10/09/2009
1566		EVERETT	WA		01/06/2006	5.950	2,774,458						6,050,000	10/05/2005
1574		EVERETT	WA		01/05/2006	5.750	1,543,300						3,530,000	11/02/2005
1159		FEDERAL WAY	WA		10/20/2000	8.450	520,275						1,740,000	09/11/2000
1231		FEDERAL WAY	WA		09/28/2001	7.450	4,082,788						7,550,000	06/20/2001
1340		FEDERAL WAY	WA		12/17/2002	6.375	2,359,193						5,200,000	10/28/2002
1647		FEDERAL WAY	WA		01/12/2007	6.125	1,320,509						7,100,000	11/20/2006
1499		FERNDALE	WA		05/17/2005	5.785	1,362,497						3,200,000	03/01/2005
1773		FIFE	WA		04/22/2008	6.000	1,748,484						3,250,000	03/20/2008
1859		FIFE	WA		04/17/2009	6.750	2,708,852						6,000,000	02/23/2009
1797		GRAHAM	WA		06/24/2008	6.625	3,642,275						6,700,000	05/11/2008
1532		ISSAQUAH	WA		07/13/2005	5.640	3,346,024						6,500,000	05/12/2005
0628		KENT	WA		12/11/1992	7.625	686,307						1,900,000	11/05/1992
1133		KENT	WA		06/16/2000	8.625	803,992						2,250,000	05/09/2000
1319		KENT	WA		09/11/2002	6.500	732,676						1,650,000	07/12/2002
1360		KENT	WA		02/14/2003	5.750	428,884						2,400,000	01/14/2003
1483		KENT	WA		11/03/2004	6.000	754,848						2,060,000	09/15/2004
1567		KENT	WA		12/02/2005	5.750	1,015,088						1,800,000	10/06/2005
1728		KENT	WA		10/01/2007	6.340	3,311,993						5,425,000	09/13/2007
1772		KENT	WA		04/23/2008	6.600	1,558,111						2,500,000	03/04/2008
1895		KENT	WA		09/01/2009	7.860	2,394,907						3,650,000	08/04/2009
0778		KIRKLAND	WA		07/29/1996	6.500	625,723						2,000,000	05/10/1996
0907		KIRKLAND	WA		05/29/1998	8.375	123,526						575,000	01/30/1998
1805		KIRKLAND	WA		07/31/2008	5.750	982,661						5,370,000	07/08/2008
1820		KIRKLAND	WA		09/29/2008	6.920	2,915,406						5,200,000	07/25/2008
1179		LACEY	WA		01/29/2001	7.320	471,213						1,125,000	12/11/2000
1698		LIBERTY LAKE	WA		09/10/2007	6.360	1,225,100						2,960,000	08/28/2007
1885		LONGVIEW	WA		07/30/2009	7.100	6,816,865						14,925,000	06/12/2009
1704		LYNNWOOD	WA		09/11/2007	6.510	2,263,989						4,600,000	08/10/2007
1606		MERCER ISLAND	WA		06/10/2004	6.000	1,251,473						3,275,000	04/13/2004
1671		MONROE	WA		06/08/2007	5.870	1,561,270						5,100,000	05/14/2007
1171		MOUNTLAKE TERRACE	WA		12/13/2000	8.250	2,102,220						4,800,000	10/31/2000
1760		MOUNTLAKE TERRACE	WA		05/01/2008	6.400	2,013,743						4,030,000	02/07/2008

E04.8

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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	9 Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value		
1627		MUKILTEO	WA		09/28/2006	6.710	1,862,588						3,175,000	06/07/2006
1688		OLYMPIA	WA		08/31/2007	6.060	1,150,437						3,860,000	07/03/2007
1757		OLYMPIA	WA		04/22/2008	6.200	4,316,399						10,100,000	01/11/2008
1854		OLYMPIA	WA		02/05/2009	6.875	1,039,655						1,820,000	12/23/2008
1413		POULSBORO	WA		10/08/2003	6.300	1,140,551						2,510,000	08/04/2003
1257		REDMOND	WA		10/30/2001	6.500	892,213						1,860,000	09/14/2001
1516		REDMOND	WA		06/14/2005	6.000	2,238,188						4,500,000	04/05/2005
1517		REDMOND	WA		06/14/2005	6.000	1,129,961						2,450,000	04/05/2005
1597		REDMOND	WA		04/18/2006	5.970	1,512,669						3,400,000	02/21/2006
1369		RENTON	WA		04/15/2003	6.125	412,371						2,400,000	02/24/2003
1410		RENTON	WA		09/24/2003	6.200	4,395,272						7,520,000	08/01/2003
1575		RENTON	WA		03/28/2006	5.920	6,984,001						12,425,000	11/22/2005
1930		RENTON	WA		11/24/2009	6.447	5,300,000						9,950,000	10/31/2009
1174		SEATTLE	WA		02/22/2001	8.875	1,382,079						8,650,000	11/02/2000
1196		SEATTLE	WA		04/17/2001	7.350	877,848						5,600,000	03/20/2001
1232		SEATTLE	WA		09/17/2001	7.625	5,837,006						22,700,000	06/21/2001
1242		SEATTLE	WA		10/18/2001	7.500	4,824,171						9,330,000	07/26/2001
1338		SEATTLE	WA		12/11/2002	6.500	836,041						3,275,000	10/07/2002
1423		SEATTLE	WA		03/26/2004	6.250	536,935						1,900,000	09/09/2003
1503		SEATTLE	WA		05/05/2005	5.650	2,340,348						9,470,000	03/09/2005
1542		SEATTLE	WA		02/26/2002	6.750	1,062,933						2,850,000	01/02/2002
1581		SEATTLE	WA		02/28/2006	5.990	1,782,402						3,800,000	12/28/2005
1689		SEATTLE	WA		08/14/2007	6.400	6,244,337						12,000,000	07/01/2007
1767		SEATTLE	WA		04/10/2008	5.400	2,347,180						4,230,000	03/04/2008
1782		SEATTLE	WA		05/23/2008	5.830	3,434,813						6,100,000	04/11/2008
1800		SEATTLE	WA		08/19/2008	6.240	5,319,401						8,400,000	07/24/2008
1804		SEATTLE	WA		08/22/2008	5.750	491,849						2,500,000	07/18/2008
1836		SEATTLE	WA		12/09/2008	7.000	2,161,976						9,500,000	11/05/2008
1843		SEDRON WOODLEY	WA		12/04/2008	6.000	2,816,043						5,700,000	11/05/2008
1755		SHORELINE	WA		03/11/2008	6.200	4,188,050						6,930,000	01/19/2008
0706		SILVERDALE	WA		02/15/1995	8.000	1,546,814						6,360,000	01/26/1995
1877		SILVERDALE	WA		07/06/2009	7.100	1,144,436						1,925,000	06/09/2009
1938		SNOHOMISH	WA		12/22/2009	6.970	1,200,000						3,300,000	11/10/2009
1356		SPOKANE	WA		04/03/2003	6.250	2,676,248						5,400,000	01/08/2003
1470		SPOKANE	WA		11/25/2002	5.875	462,095						980,000	10/01/2002
1746		SPOKANE VALLEY	WA		01/18/2008	6.100	1,947,780						3,030,000	12/11/2007
1771		SPOKANE VALLEY	WA		04/25/2008	6.100	2,393,794						3,880,000	03/28/2008
1817		SUMNER	WA		08/16/2008	5.580	3,051,709						4,650,000	08/11/2008
1818		SUMNER	WA		09/16/2008	5.580	2,657,935						4,200,000	08/22/2008
0830		TACOMA	WA		05/20/1997	7.125	401,891						840,000	03/12/1997
1092		TACOMA	WA		12/22/1999	8.000	902,485						4,985,000	11/01/1999
1248		TACOMA	WA		11/05/2001	7.500	2,748,250						6,225,000	08/03/2001
1466		TACOMA	WA		07/07/2004	6.000	1,731,979						3,000,000	04/30/2004
1480		TACOMA	WA		10/28/2004	6.250	1,104,229						4,200,000	09/01/2004
1615		TACOMA	WA		06/29/2006	6.600	1,503,856						2,990,000	05/02/2006
1672		TACOMA	WA		05/17/2007	6.305	1,170,471						3,150,000	03/08/2005
1822		TACOMA	WA		10/06/2008	6.310	1,193,691						2,600,000	09/05/2008
1380		TUMWATER	WA		07/18/2003	6.000	2,679,202						5,000,000	04/02/2003
1464		VANCOUVER	WA		07/15/2004	7.000	1,789,741						4,098,700	04/27/2004
1825		VANCOUVER	WA		12/02/2008	5.800	2,257,387						3,600,000	09/12/2008
1837		VANCOUVER	WA		12/12/2008	6.000	1,772,113						4,755,000	11/05/2008
1502		VERADALE	WA		05/03/2005	5.600	836,068						1,350,000	03/08/2005
0776		WOODINVILLE	WA		06/27/1996	7.000	285,919						2,900,000	05/01/1996
1778		WOODINVILLE	WA		05/23/2008	6.125	8,639,024						22,280,000	04/03/2008
1875		WOODINVILLE	WA		07/15/2009	6.750	2,586,694						5,400,000	04/23/2009
1521		YAKIMA	WA		07/15/2005	5.850	1,004,190						1,570,000	04/13/2005
1522		YAKIMA	WA		07/15/2005	5.850	1,369,334						2,140,000	04/15/2005
1645		CAMPBELLSPORT	WI		12/28/2006	6.290	1,221,645						2,410,000	10/28/2006
1537		OAK HILL	WV		08/02/2005	5.500	3,040,545						6,000,000	05/27/2005
1553		CASPER	WY		11/16/2005	6.125	439,119						1,010,000	08/15/2005
0599999. Mortgages in good standing - Commercial mortgages-all other							1,176,071,609						2,646,638,654	XXX

E04.9



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

**SCHEDULE B - PART 1**

Showing All Mortgage Loans OWNED December 31 of Current Year

1 Loan Number	2 Code	3 Location		5 Loan Type	6 Date Acquired	7 Rate of Interest	8 Book Value/Recorded Investment Excluding Accrued Interest	Change in Book Value/Recorded Investment					14 Value of Land and Buildings	15 Date of Last Appraisal or Valuation	
		3 City	4 State					9 Unrealized Valuation Increase (Decrease)	10 Current Year's (Amortization)/ Accretion	11 Current Year's Other Than Temporary Impairment Recognized	12 Capitalized Deferred Interest and Other	13 Total Foreign Exchange Change in Book Value			
0899999. Total Mortgages in good standing							1,176,071,609						2,646,638,654	XXX	
1699999. Total - Restructured Mortgages															XXX
1643		STOCKTON	CA		12/11/2006	12.270	1,670,000			2,190,049			1,670,000	12/15/2009	
2199999. Mortgages with overdue interest over 90 days-Commercial mortgages-all other							1,670,000			2,190,049				1,670,000	XXX
2499999. Total - Mortgages with overdue interest over 90 days							1,670,000			2,190,049				1,670,000	XXX
3299999. Total - Mortgages in the process of foreclosure															XXX
3399999 - Totals							1,177,741,609			2,190,049				2,648,308,654	XXX

General Interrogatory:

- Mortgages in good standing \$ ..... unpaid taxes \$ ..... interest due and unpaid.
- Restructured mortgages \$ ..... unpaid taxes \$ ..... interest due and unpaid.
- Mortgages with overdue interest over 90 days not in process of foreclosure \$ ..... unpaid taxes \$ .....<sup>19,982</sup> interest due and unpaid.
- Mortgages in process of foreclosure \$ ..... unpaid taxes \$ ..... interest due and unpaid.

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

**SCHEDULE B - PART 2**

Showing All Mortgage Loans ACQUIRED AND ADDITIONS MADE During the Current Year

1 Loan Number	2 Location		3 State	4 Loan Type	5 Date Acquired	6 Rate of Interest	7 Actual Cost at Time of Acquisition	8 Additional Investment Made After Acquisition	9 Value of Land and Buildings
	City								
1809	RANCHO CUCAMONGA	CA			10/02/2008	6.700		600,000	4,730,000
1838	LOS ANGELES	CA			01/30/2009	6.000	3,700,000		6,525,000
1842	NOVI	MI			01/22/2009	6.500	2,200,000		4,750,000
1844	GRAND PRAIRIE	TX			01/23/2009	7.550	1,250,000		2,190,000
1845	INGLEWOOD	CA			01/12/2009	7.100	650,000		2,710,000
1846	LOS ANGELES	CA			02/26/2009	6.050	2,400,000		8,300,000
1847	MARINA DEL RAY	CA			02/26/2009	6.000	1,750,000		5,170,000
1848	SANTA MONICA	CA			01/29/2009	6.000	2,100,000		8,560,000
1849	SANTA MONICA	CA			01/29/2009	6.000	1,250,000		7,240,000
1850	SANTA CLARA	CA			02/03/2009	6.250	3,600,000		7,700,000
1851	SANTA CLARA	CA			02/04/2009	6.250	2,750,000		5,000,000
1852	SANTA CLARA	CA			02/04/2009	6.250	2,090,000		3,800,000
1853	BURLINGAME	CA			02/03/2009	6.750	5,000,000		13,600,000
1854	OLYMPIA	WA			02/05/2009	6.875	1,050,000		1,820,000
1856	BURLINGAME	CA			02/12/2009	6.650	5,500,000		24,000,000
1857	PASADENA	CA			06/11/2009	6.760	4,500,000		8,300,000
1858	PLANO	TX			02/27/2009	6.300	3,770,000		5,860,000
1859	FIFE	WA			04/17/2009	6.750	2,725,000		6,000,000
1863	AUSTIN	TX			04/29/2009	6.650	2,500,000		4,850,000
1864	EMERYVILLE	CA			04/15/2009	6.750	2,300,000		7,100,000
1867	GLENDALE	AZ			04/15/2009	6.950	4,000,000		8,220,000
1868	HOUSTON	TX			06/17/2009	7.130	2,200,000		6,140,000
1869	ATLANTA	GA			06/01/2009	7.060	9,500,000		18,300,000
1870	SAN MATEO	CA			05/21/2009	6.300	8,200,000		19,100,000
1871	HOUSTON	TX			05/27/2009	6.770	3,165,000		5,500,000
1872	KAHULUI	HI			05/15/2009	7.850	2,000,000		5,710,000
1873	SANTA CLARA	CA			05/14/2009	6.750	2,800,000		7,500,000
1874	HOFFMAN ESTATES	IL			06/11/2009	7.910	1,000,000		2,700,000
1875	WOODINVILLE	WA			07/15/2009	6.750	2,600,000		5,400,000
1876	LAS VEGAS	NV			06/11/2009	6.780	2,000,000		3,670,000
1877	SILVERDALE	WA			07/06/2009	7.100	1,150,000		1,925,000
1878	MONROVIA	CA			09/29/2009	7.400	1,300,000		3,730,000
1880	WALNUT	CA			07/06/2009	7.650	2,700,000		4,230,000
1882	COLUMBUS	OH			07/30/2009	7.250	5,500,000		18,650,000
1883	PASADENA	TX			07/08/2009	6.625	3,400,000		6,200,000
1884	PORTLAND	OR			07/30/2009	7.100	3,500,000		5,750,000
1885	LONGVIEW	WA			07/30/2009	7.100	6,850,000		14,925,000
1887	PORTLAND	OR			08/11/2009	6.750	2,075,000		5,090,000
1888	PORTLAND	OR			08/11/2009	6.750	1,150,000		1,960,000
1889	PORTLAND	OR			08/11/2009	6.750	1,075,000		1,930,000
1890	PORTLAND	OR			08/11/2009	6.750	700,000		1,710,000
1892	RICHMOND	CA			08/31/2009	6.950	4,650,000		10,200,000
1894	ALISO VIEJO	CA			07/27/2009	6.950	5,500,000		9,580,000
1895	KENT	WA			09/01/2009	7.860	2,400,000		3,650,000
1898	STOUX FALLS	SD			09/11/2009	6.720	2,400,000		4,750,000
1902	VIENNA	VA			09/21/2009	7.940	6,200,000		10,900,000
1904	ATLANTA	GA			08/31/2009	6.250	4,475,000		7,630,000
1905	HOUSTON	TX			08/31/2009	6.340	6,000,000		9,975,000
1909	EDEN PRAIRIE	MN			11/03/2009	7.000	2,000,000		4,200,000
1910	GREENSBORO	NC			11/03/2009	7.000	1,800,000		3,660,000
1911	NEWARK	DE			11/03/2009	7.000	1,200,000		2,520,000
1913	IRVING	TX			12/17/2009	6.370	4,600,000		7,800,000
1916	LAGUNA WOODS	CA			10/05/2009	7.650	2,235,000		3,750,000
1917	ST CHARLES	MO			10/19/2009	6.850	4,500,000		10,450,000
1920	BURLINGAME	CA			11/12/2009	6.550	5,000,000		9,850,000
1921	WARREN	MI			11/04/2009	6.625	536,779		2,100,000
1922	BUFFALO	NY			12/08/2009	6.800	5,250,000		8,350,000
1923	TONOWANDA	NY			12/11/2009	6.800	7,475,000		12,900,000
1924	SUNNYVALE	CA			12/31/2009	6.750	3,025,000		5,430,000
1925	MARIETTA	GA			12/28/2009	7.350	2,575,000		4,425,000
1927	VAN NUYS	CA			12/03/2009	6.820	2,830,000		5,800,000
1928	COEUR DALENE	ID			12/03/2009	6.870	3,000,000		5,100,000
1929	EDMONDS	WA			12/18/2009	6.250	4,350,000		8,950,000
1930	RENTON	WA			11/24/2009	6.447	5,300,000		9,950,000
1931	BALTIMORE	MD			12/28/2009	7.375	6,000,000		11,450,000
1933	LOS ANGELES	CA			12/16/2009	7.300	1,850,000		4,750,000

E05

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

**SCHEDULE B - PART 2**

Showing All Mortgage Loans ACQUIRED AND ADDITIONS MADE During the Current Year

1 Loan Number	Location		4 Loan Type	5 Date Acquired	6 Rate of Interest	7 Actual Cost at Time of Acquisition	8 Additional Investment Made After Acquisition	9 Value of Land and Buildings
	2 City	3 State						
1934	DANA POINT	CA		11/20/2009	7.500	4,500,000		9,940,000
1936	TALLMADGE	DH		12/28/2009	7.050	5,165,000		9,880,000
1938	SNOHOMISH	WA		12/22/2009	6.970	1,200,000		3,300,000
1939	SAN DIEGO	CA		12/17/2009	6.750	4,700,000		10,640,000
1941	ALISO VIEJO	CA		12/28/2009	6.300	2,300,000		5,550,000
1944	HILLSBORO	OR		12/11/2009	6.650	5,200,000		12,680,000
1945	HILLSBORO	OR		12/11/2009	6.650	6,480,000		14,420,000
1946	HILLSBORO	OR		12/11/2009	6.650	1,450,000		4,940,000
1947	HILLSBORO	OR		12/11/2009	6.650	3,250,000		6,540,000
1948	HILLSBORO	OR		12/11/2009	6.650	2,520,000		5,270,000
1950	RENO	NV		12/30/2009	6.950	2,500,000		5,000,000
1951	RENO	NV		12/30/2009	6.950	3,500,000		5,890,000
1953	INDIANAPOLIS	IN		12/30/2009	6.600	8,000,000		15,700,000
0599999. Mortgages in good standing - Commercial mortgages-all other						263,866,779	600,000	574,415,000
0899999. Total Mortgages in good standing						263,866,779	600,000	574,415,000
1699999. Total - Restructured Mortgages								
2499999. Total - Mortgages with overdue interest over 90 days								
3299999. Total - Mortgages in the process of foreclosure								
3399999 - Totals						263,866,779	600,000	574,415,000

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
0597	CHINO	CA		12/15/1991	01/02/2009	1,641,650						1,641,650	1,641,650			
0677	TUKWILA	WA		05/20/1994	06/09/2009	37,438						37,438	37,438			
0790	FRESNO	CA		09/30/1996	11/04/2009	905,195						905,195	905,195			
0837	SANTA FE SPGS	CA		05/22/1997	10/26/2009	80,790						80,790	80,790			
0840	MEMPHIS	TN		05/22/1997	07/01/2009	332,131						332,131	332,131			
0948	INGLEWOOD	CA		09/24/1998	01/12/2009	596,129						596,129	596,129			
0986	LITTLETON	CO		02/23/1999	12/01/2009	75,243						75,243	75,243			
0997	LONGVIEW	WA		03/30/1999	12/28/2009	2,117,697						2,117,697	2,117,697			
0998	SPRINGFIELD	OR		03/30/1999	02/11/2009	1,917,919						1,917,919	1,917,919			
1005	KENT	WA		05/03/1999	03/23/2009	547,924						547,924	547,924			
1008	LAS VEGAS	NV		03/30/1999	01/05/2009	221						221	221			
1024	LOS ANGELES	CA		05/26/1999	04/24/2009	489,178						489,178	489,178			
1026	LINCOLN	NE		07/06/1999	08/13/2009	1,171,058						1,171,058	1,171,058			
1027	LINCOLN	NE		07/06/1999	08/13/2009	1,298,460						1,298,460	1,298,460			
1028	LINCOLN	NE		07/06/1999	08/13/2009	681,927						681,927	681,927			
1030	LINCOLN	NE		07/06/1999	08/13/2009	568,227						568,227	568,227			
1035	CANOGA PARK	CA		07/26/1999	07/15/2009	632,993						632,993	632,993			
1073	CERRITOS	CA		11/29/1999	08/03/2009	48,083						48,083	48,083			
1127	FULLERTON	CA		06/22/2000	09/18/2009	389,628						389,628	389,628			
1148	PORTLAND	OR		09/13/2000	11/02/2009	433,652						433,652	433,652			
1186	MONROVIA	CA		02/26/2001	09/29/2009	379,145						379,145	379,145			
1187	DRAPER	UT		03/22/2001	01/22/2009	711,125						711,125	711,125			
1193	THOUSAND PLMS	CA		03/13/2002	10/22/2009	1,230,726						1,230,726	1,230,726			
1205	TIGARD	OR		05/21/2002	07/02/2009	1,820,031						1,820,031	1,820,031			
1211	JACKSONVILLE	FL		05/29/2001	07/22/2009	1,310,921						1,310,921	1,310,921			
1278	COCONUT GROVE-MIAMI	FL		02/25/2002	06/18/2009	1,362,166						1,362,166	1,362,166			
1286	CAMARILLO	CA		04/16/2002	03/23/2009	734,903						734,903	734,903			
1290	BREA	CA		04/04/2002	12/18/2009	428,781						428,781	428,781			
1300	BELLEVUE	WA		05/30/2002	12/31/2009	1,093,523						1,093,523	1,093,523			
1337	RENTON	WA		12/26/2002	05/18/2009	701,878						701,878	701,878			
1341	CHEYENNE	WY		05/04/2001	05/05/2009	4,010,016						4,010,016	4,010,016			
1388	WARREN	MI		08/29/2003	11/04/2009	556,579						556,579	556,579			
1397	TACOMA	WA		08/15/2003	07/17/2009	111,179						111,179	111,179			
1412	POULSBORO	WA		10/08/2003	05/28/2009	1,147,787						1,147,787	1,147,787			
1414	POULSBORO	WA		10/08/2003	05/28/2009	1,317,809						1,317,809	1,317,809			
1529	MILWAUKIE	OR		06/28/2001	01/07/2009	821,756						821,756	821,756			
1577	YAKIMA	WA		01/30/2006	10/06/2009	2,321,647						2,321,647	2,321,647			
0199999. Mortgages closed by repayment						34,025,515						34,025,515	34,025,515			
0362	EL SEGUNDO	CA		10/29/1986		260,546							80,358			
0409	BURBANK	CA		11/17/1987		705,066							162,294			
0422	S PASADENA	CA		03/31/1988		834,524							175,128			
0434	CHATSWORTH	CA		06/22/1988		358,447							68,001			
0455	VAN NUYS	CA		10/04/1988		480,336							88,518			
0616	IRVINE	CA		05/23/2002		599,454							52,525			
0628	KENT	WA		12/11/1992		742,192							55,885			
0640	SAN DIEGO	CA		05/26/1993		364,191							221,778			
0641	SANTEE	CA		06/17/1993		281,632							54,672			
0706	SILVERDALE	WA		02/15/1995		1,757,915							211,101			
0711	EL CERRITO	CA		07/31/1995		531,499							66,654			
0730	ANAHEIM	CA		12/07/1995		201,045							107,610			
0751	CHATSWORTH	CA		02/13/1996		433,815							198,645			
0764	YORBA LINDA	CA		04/03/1996		278,582							31,606			
0771	SANTA CLARA	CA		06/26/1996		212,011							76,638			
0775	INDIANAPOLIS	IN		08/26/1996		847,335							284,576			
0776	WOODINVILLE	WA		06/27/1996		450,821							164,902			
0778	KIRKLAND	WA		07/29/1996		698,263							72,540			
0804	FRESNO	CA		02/06/1997		179,033							74,830			
0811	ARCADIA	CA		03/31/1997		241,057							70,747			
0821	COLORADO SPGS	CO		04/17/1997		1,326,725							114,257			

E06

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
0827	PORTLAND	OR		03/28/1997		318,846								39,622		
0830	TACOMA	WA		05/20/1997		421,809								19,917		
0831	CORONA	CA		06/26/1997		425,788								153,307		
0858	SANTA FE SPGS	CA		07/29/1997		140,810								37,227		
0863	SALT LAKE CITY	UT		09/05/1997		502,046								40,898		
0889	GARDEN GROVE	CA		04/09/1998		649,414								49,957		
0890	WOODLAND	CA		01/05/1998		478,950								38,123		
0901	CANOGA PARK	CA		03/27/1998		388,714								29,877		
0907	KIRKLAND	WA		05/29/1998		152,935								29,409		
0910	LAS VEGAS	NV		05/07/1998		555,012								41,872		
0913	FRESNO	CA		06/03/1998		209,657								40,916		
0914	LITTLETON	CO		08/24/1998		733,462								105,485		
0918	DANVILLE	CA		06/12/1998		347,093								65,787		
0920	CLOVIS	CA		05/28/1998		439,687								30,591		
0929	OCEANSIDE	CA		07/20/1998		448,705								83,206		
0931	LAGUNA NIGUEL	CA		10/06/1998		616,213								44,630		
0934	HALF MOON BAY	CA		08/27/1998		332,710								60,546		
0938	LITTLETON	CO		09/18/1998		1,179,785								48,425		
0939	TORRANCE	CA		07/30/1998		521,032								41,365		
0953	MARTINSVILLE	VA		09/25/1998		8,807,878								357,532		
0954	COEUR D ALENE	ID		11/19/1998		532,348								39,292		
0962	CANOGA PARK	CA		11/12/1998		353,672								25,970		
0963	CHATSWORTH	CA		10/20/1998		1,261,389								91,399		
0964	PACOMA	CA		10/20/1998		796,613								57,732		
0966	EL SEGUNDO	CA		12/01/1998		517,064								49,094		
0967	BOISE	ID		12/03/1998		1,089,204								75,742		
0980	LAKEWOOD	CA		02/22/1999		342,541								25,350		
0983	SHERMAN OAKS	CA		03/31/1999		234,025								37,113		
0984	INDIANAPOLIS	IN		04/09/1999		1,138,654								76,363		
0984	BOULDER	CO		03/26/1999		909,920								59,966		
1000	SALINAS	CA		04/14/1999		682,922								112,597		
1003	DIXON	CA		04/09/1999		366,602								24,213		
1007	FRESNO	CA		07/30/1999		3,079,543								192,004		
1017	ROCKY MOUNT	NC		06/28/1999		1,146,550								75,893		
1036	ALISO VIEJO	CA		07/01/1999		379,361								50,318		
1041	FRESNO	CA		09/01/1999		259,074								37,480		
1046	GOLETA	CA		08/18/1999		516,270								74,835		
1048	SAN ANGELO	TX		08/23/1999		841,839								129,256		
1061	PLEASANTON	CA		09/20/1999		522,456								34,794		
1062	COMMERCE CITY	CO		09/13/1999		348,650								5,886		
1067	OREM	UT		12/14/1999		406,457								54,822		
1070	AYER	MA		11/24/1999		5,924,939										
1071	LITTLETON	CO		11/09/1999		653,413								24,727		
1077	ENGLEWOOD	CO		11/30/1999		1,311,904								47,450		
1083	LINCOLN	NE		12/01/1999		1,744,211								236,011		
1085	BEAVERTON	OR		02/17/2000		1,067,863								26,707		
1089	SAN JOSE	CA		01/11/2000		712,786								95,840		
1092	TACOMA	WA		12/22/1999		979,192								76,707		
1096	FRESNO	CA		01/28/2000		677,545								38,952		
1098	MONTGOMERY	AL		01/25/2000		985,080								64,619		
1101	TUALATIN	OR		02/01/2000		2,577,380								81,511		
1104	PITTSBURGH	PA		02/01/2000		13,938,207								517,546		
1108	DALLAS	TX		07/31/1997		326,048								26,178		
1109	DALLAS	TX		07/31/1997		713,449								57,250		
1119	THOUSAND PLMS	CA		05/30/2000		1,535,452								100,412		
1122	GULFPORT	MS		05/16/2000		1,326,945								71,189		
1123	PROVO	UT		06/15/2000		1,535,067								83,707		
1133	KENT	WA		06/16/2000		914,011								110,019		
1141	DALLAS	TX		08/31/2000		1,734,331								98,062		
1143	AUSTIN	TX		10/18/2000		616,749								68,424		
1144	FRESNO	CA		08/01/2000		1,196,167								79,644		

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment						14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)	13 Total Foreign Exchange Change in Book Value					
1155	TUCSON	AZ		10/31/2000		1,819,793											43,380
1159	FEDERAL WAY	WA		10/20/2000		689,837											169,562
1166	DALLAS	TX		12/14/2000		1,054,616											63,951
1169	ST PAUL	MN		10/30/2000		618,263											74,301
1170	OMAHA	NE		12/20/2000		400,990											43,000
1171	MOUNTLAKE TERRACE	WA		12/13/2000		2,162,651											60,431
1173	CLOVIS	CA		01/22/2001		673,116											107,871
1174	SEATTLE	WA		02/22/2001		1,636,773											254,694
1175	SALT LAKE CITY	UT		01/03/2001		1,814,380											94,214
1177	CHATSWORTH	CA		12/21/2000		478,620											239,640
1179	LACEY	WA		01/29/2001		497,661											26,448
1183	BOULDER	CO		02/28/2001		709,903											87,057
1191	CLOVIS	CA		04/11/2001		817,965											41,239
1192	LOUISVILLE	KY		05/18/2001		944,482											46,666
1194	ARVADA	CO		05/23/2001		1,222,812											40,113
1195	BOULDER	CO		04/10/2001		651,840											35,877
1196	SEATTLE	WA		04/17/2001		924,624											46,776
1197	ONTARIO	OR		06/21/2001		3,136,389											1,136,135
1201	GOLDEN	CO		04/19/2001		451,246											60,343
1202	BELLEVUE	WA		05/31/2001		1,537,422											78,465
1209	OXNARD	CA		06/14/2001		414,365											20,582
1210	OXNARD	CA		06/14/2001		416,743											20,696
1212	GRANDVILLE	MI		06/26/2001		317,398											148,192
1213	ABERDEEN	SD		06/14/2001		323,761											111,821
1215	N HIGHLANDS	CA		06/28/2001		669,059											33,097
1221	NORTHRIDGE	CA		08/08/2001		1,103,877											54,392
1222	LUBBOCK	TX		08/15/2001		2,920,829											286,388
1223	WESTMINSTER	CO		07/25/2001		870,187											42,485
1227	DENVER	CO		08/14/2001		1,505,030											148,209
1231	FEDERAL WAY	WA		09/28/2001		4,290,307											207,519
1232	SEATTLE	WA		09/17/2001		6,485,912											648,906
1240	HOLLYWOOD	CA		10/22/2001		599,856											57,194
1242	SEATTLE	WA		10/18/2001		5,061,750											237,579
1246	VALENCIA	CA		12/18/2001		1,728,482											81,003
1247	TARZANA	CA		12/18/2001		1,088,579											51,008
1248	TACOMA	WA		11/05/2001		2,884,619											136,369
1251	SALEM	OR		10/31/2001		1,037,770											49,548
1257	REDMOND	WA		10/30/2001		941,096											48,883
1258	ORANGE CITY	FL		12/28/2001		1,057,368											108,128
1266	MILPITAS	CA		12/05/2001		2,406,698											113,631
1267	FORT BRAGG	CA		12/28/2001		874,157											81,860
1268	BELLEVUE	WA		12/10/2001		1,352,459											65,607
1269	HILLSBORO	OR		12/12/2001		5,645,262											161,353
1277	SAN ANTONIO	TX		01/25/2002		2,717,150											249,892
1279	AUBURN	WA		01/30/2002		1,533,108											71,149
1282	SIGNAL HILL	CA		04/04/2002		734,894											33,032
1285	LITTLETON	CO		03/06/2002		833,442											32,125
1295	CERRITOS	CA		05/09/2002		1,068,149											46,752
1296	RANCHO DOMINGUEZ	CA		05/13/2002		1,077,435											144,091
1297	SAN DIEGO	CA		11/12/1998		1,182,463											84,862
1301	LAKEWOOD	CO		06/17/2002		1,644,768											140,683
1305	ROMULUS	MI		07/16/2002		922,141											84,809
1310	DALLAS	TX		07/22/2002		12,010,030											544,404
1311	BOISE	ID		08/27/2002		2,145,474											178,916
1313	COLUMBIA	SC		09/05/2002		5,358,483											249,628
1314	BEACHWOOD	OH		09/30/2002		1,121,895											48,024
1315	BEND	OR		08/19/2002		666,324											18,840
1317	FAIRFIELD	CA		08/14/2002		1,380,889											117,380
1318	LOGAN	UT		09/17/2002		815,033											37,619
1319	KENT	WA		09/11/2002		768,780											36,104
1325	LOUISVILLE	CO		02/28/2003		3,536,435											138,555

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
1326	SALEM	OR		10/31/2001		1,995,756								95,276		
1327	SALEM	OR		12/21/2001		1,689,009								79,061		
1328	MADERA	CA		11/12/2002		614,785								141,986		
1338	SEATTLE	WA		12/11/2002		912,290								76,249		
1340	FEDERAL WAY	WA		12/17/2002		2,484,784								125,591		
1344	GRAPEVINE	TX		12/26/2002		6,457,472								536,673		
1345	FRESNO	CA		04/04/2003		582,851								26,762		
1346	HUNTINGTON BEACH	CA		01/02/2003		841,726								73,155		
1349	AUSTIN	TX		03/31/2003		686,356								55,297		
1350	ENGLEWOOD	CO		02/18/2003		994,013								44,232		
1352	SAN ANTONIO	TX		02/10/2003		690,495								33,162		
1353	DENVER	CO		02/25/2003		1,241,995								48,653		
1354	MIAMI SBURG	OH		03/10/2003		2,125,367								100,274		
1356	SPOKANE	WA		04/03/2003		2,801,235								124,988		
1358	ANAHEIM	CA		03/27/2003		525,782								42,890		
1360	KENT	WA		02/14/2003		545,472								116,588		
1361	DALLAS	TX		04/15/2003		2,646,187								210,573		
1363	FRESNO	CA		04/03/2003		641,495								121,438		
1367	MESA	AZ		05/06/2003		1,001,831								43,547		
1369	RENTON	WA		04/15/2003		517,582								105,211		
1371	MILWAUKIE	OR		04/18/2003		1,116,973								170,529		
1372	TUALATIN	OR		04/29/2003		1,553,303								45,022		
1373	EL CAJON	CA		05/20/2003		835,109								36,577		
1374	SAN DIEGO	CA		05/13/2003		571,787								26,257		
1375	CAMARILLO	CA		04/23/2003		553,116								59,585		
1376	LITTLETON	CO		05/20/2003		1,503,275								65,822		
1377	KANSAS CITY	MO		06/09/2003		887,923								70,005		
1378	LOS ANGELES	CA		04/24/2003		1,323,150								105,283		
1379	FRESNO	CA		06/30/2003		928,177								72,580		
1380	TUMWATER	WA		07/18/2003		2,753,040								73,838		
1383	SPANISH FORK	UT		05/01/2003		740,473								59,267		
1384	HILLSBORO	OR		06/27/2003		854,442								44,532		
1385	SAN DIEGO	CA		05/22/2003		251,642								10,810		
1386	RANCHO CUCAMONGA	CA		05/29/2003		1,090,504								46,831		
1387	ARVADA	CO		06/20/2003		1,182,843								98,126		
1389	GAITHERSBURG	MD		06/24/2003		896,539								23,457		
1390	FOSTER CITY	CA		05/30/2003		1,166,020								52,052		
1394	CULVER CITY	CA		07/31/2003		510,871								91,828		
1396	ENGLEWOOD	CO		08/22/2003		1,389,211								59,891		
1400	SANTA BARBARA	CA		07/31/2003		800,281								35,054		
1401	POMONA	CA		08/18/2003		3,678,961								106,185		
1402	PORTLAND	OR		08/11/2003		685,643								29,739		
1403	MILWAUKIE	OR		08/11/2003		628,166								27,242		
1404	BAKERSFIELD	CA		08/28/2003		657,320								105,223		
1406	TUSTIN	CA		08/28/2003		480,973								21,353		
1407	SIMI VALLEY	CA		09/18/2003		852,065								50,707		
1408	DENVER	CO		09/26/2003		2,257,451								98,594		
1409	WESTLAND	MI		09/19/2003		827,482								68,780		
1410	RENTON	WA		09/24/2003		4,590,252								194,980		
1411	SALT LAKE CITY	UT		09/26/2003		633,703								27,083		
1413	POULSBORO	WA		10/08/2003		1,190,293								49,742		
1416	HILLSBORO	OR		10/10/2003		2,394,824								83,025		
1417	OREM	UT		10/16/2003		2,128,117								88,383		
1418	SPRINGVILLE	UT		09/30/2003		1,039,416								43,543		
1423	SEATTLE	WA		03/26/2004		561,400								24,465		
1427	PORTLAND	OR		11/24/2003		3,068,038								89,190		
1430	THOUSAND OAKS	CA		02/18/2004		2,053,371								84,184		
1433	TURLOCK	CA		07/30/1997		5,661,500								476,169		
1434	TURLOCK	CA		08/14/2000		540,275								45,040		
1436	LAGUNA BEACH	CA		12/29/2003		901,074								23,930		
1437	PROVO	UT		12/29/2003		1,177,679								52,653		

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
1439	AURORA	CO		02/18/2004		4,135,285								169,225		
1441	ROBBINSDALE	MI		03/12/2004		2,800,445								497,710		
1442	LITTLE ROCK	AR		03/12/2004		557,320								288,384		
1444	LOS ANGELES	CA		02/11/2004		516,630								20,946		
1445	OREM	UT		02/11/2004		2,144,773								87,751		
1449	FRESNO	CA		03/31/2004		1,800,101								75,420		
1451	BOISE	ID		05/13/2004		1,512,196								36,503		
1452	MIAMI	FL		03/30/2004		2,571,556								107,735		
1454	SAN DIEGO	CA		05/11/2004		541,746								38,913		
1455	BOULDER	CO		05/20/2004		1,518,633								62,622		
1456	CORVALLIS	OR		05/25/2004		2,071,899								85,227		
1459	TUCSON	AZ		06/17/2004		534,940								129,283		
1461	COLLEGE STATION	TX		06/23/2004		1,882,321								77,560		
1462	PORTLAND	OR		06/22/2004		884,919								62,580		
1463	DENVER	CO		07/01/2004		2,085,869								83,496		
1464	VANCOUVER	WA		07/15/2004		1,926,426								136,685		
1466	TACOMA	WA		07/07/2004		1,777,371								45,391		
1469	PHOENIX	AZ		07/29/2004		723,875								48,333		
1470	SPOKANE	WA		11/25/2002		483,177								21,083		
1472	REDONDO BEACH	CA		08/30/2004		663,575								15,686		
1473	NORTH LAS VEGAS	NV		08/19/2004		1,225,405								32,595		
1475	SAN JOSE	CA		09/24/2004		1,056,372								40,405		
1476	FORT WORTH	TX		09/29/2004		1,022,306								41,705		
1478	SAN DIMAS	CA		10/21/2004		1,107,549								41,035		
1480	TACOMA	WA		10/28/2004		1,147,784								43,554		
1482	PASADENA	CA		11/10/2004		1,059,444								40,736		
1483	KENT	WA		11/03/2004		809,062								54,214		
1484	PHOENIX	AZ		12/10/2004		1,098,083								29,507		
1485	PORTAGE	IN		12/14/2004		2,284,745								93,997		
1487	DOWNEY	CA		12/27/2004		992,122								38,679		
1488	FRESNO	CA		12/28/2004		2,214,286								54,657		
1491	BELLEVUE	NE		01/20/2005		777,112								29,415		
1493	FRESNO	CA		02/01/2005		655,027								113,023		
1494	AURORA	CO		03/08/2005		997,690								24,187		
1495	LAKEWOOD	CO		03/24/2005		680,123								96,345		
1496	IRVINE	CA		03/08/2005		1,571,441								39,870		
1497	SAN DIEGO	CA		04/04/2005		3,118,309								131,005		
1498	SAN DIEGO	CA		04/05/2005		2,209,182								59,676		
1499	FERNDALE	WA		05/17/2005		1,396,261								33,763		
1500	CHARLESTON	SC		05/04/2005		2,689,059								66,660		
1501	MISHAWAKA	IN		05/04/2005		1,114,234								43,634		
1502	VERADALE	WA		05/03/2005		857,440								21,372		
1503	SEATTLE	WA		05/05/2005		2,439,096								98,748		
1504	LITTLETON	CO		05/05/2005		649,762								24,428		
1505	SANTA ANA	CA		08/10/2005		5,574,949								140,663		
1506	BRIGHTON	MI		05/12/2005		2,957,610								111,178		
1508	GRAND ISLAND	NE		04/26/2005		2,999,285								72,161		
1509	ST PAUL	MIN		05/19/2005		796,355								49,997		
1510	AUSTIN	TX		05/05/2005		604,855								14,682		
1511	TUCSON	AZ		05/26/2005		2,777,067								71,690		
1513	MIDLOTHIAN	VA		06/01/2005		841,171								52,023		
1514	ARCADIA	CA		05/16/2005		1,416,166								33,862		
1516	REDMOND	WA		06/14/2005		2,322,559								84,371		
1517	REDMOND	WA		06/14/2005		1,172,555								42,594		
1519	LOS ANGELES	CA		06/23/2005		1,048,966								25,298		
1520	LOS ANGELES	CA		06/23/2005		745,941								17,986		
1521	YAKIMA	WA		07/15/2005		1,028,528								24,338		
1522	YAKIMA	WA		07/15/2005		1,402,526								33,192		
1523	FRESNO	CA		07/27/2005		569,513								13,742		
1524	BEND	OR		06/23/2005		899,451								33,419		
1525	NORWALK	CA		07/30/2003		840,947								36,202		

E06.4



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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
1526	ARVADA	CO		06/20/2005		1,165,586								36,340		
1527	WEST SACRAMENTO	CA		06/30/2005		979,480								85,995		
1530	CLACKAMAS	OR		06/30/2005		899,453								33,420		
1531	ANAHEIM	CA		07/27/2005		1,539,831								37,354		
1532	ISSAQUAH	WA		07/13/2005		3,429,309								83,285		
1535	LAS VEGAS	NV		07/06/2005		673,864								25,111		
1536	MESA	AZ		06/29/2005		1,070,350								39,770		
1537	OAK HILL	WV		08/02/2005		3,244,732								204,187		
1538	CAMBRIDGE	MN		07/12/2005		1,149,683								28,772		
1539	GLENDALE	AZ		10/17/2005		1,073,238								64,434		
1540	SACRAMENTO	CA		03/14/2003		1,979,473								84,173		
1541	FRESNO	CA		08/18/2005		902,180								33,786		
1542	SEATTLE	WA		02/26/2002		1,116,956								54,023		
1543	FRESNO	CA		11/10/2005		1,984,954								45,321		
1544	MATTHEWS	NC		09/14/2005		1,154,722								40,536		
1545	FOLSOM	CA		01/18/2006		1,179,758								67,411		
1547	PHOENIX	AZ		09/20/2005		780,513								29,016		
1548	CITY OF INDUSTRY	CA		09/01/2005		1,543,240								37,022		
1549	PHOENIX	AZ		09/29/2005		721,362								17,271		
1550	CHANDLER	AZ		09/29/2005		819,741								19,622		
1552	TUCSON	AZ		10/14/2005		3,092,177								111,981		
1553	CASPER	WY		11/16/2005		455,123								16,004		
1554	SPOTSVLVANIA	VA		12/16/2005		3,207,199								112,440		
1556	BLOOMINGTON	IN		10/24/2005		909,437								32,945		
1557	NASHVILLE	TN		11/18/2005		870,502								31,494		
1558	CAMDEN	SC		11/10/2005		3,825,146								88,320		
1559	WAYNEVILLE	NC		04/14/2004		4,781,100								114,114		
1560	FRESNO	CA		11/22/2005		601,054								14,485		
1561	PROVO	UT		10/31/2005		498,639								18,948		
1562	CULVER CITY	CA		11/22/2005		1,703,046								36,690		
1563	MURFREESBORO	TN		10/21/2005		846,206								30,513		
1566	EVERETT	WA		01/06/2006		2,838,209								63,751		
1567	KENT	WA		12/02/2005		1,052,452								37,364		
1568	TULSA	OK		12/27/2005		1,647,299								58,489		
1569	SUNNYVALE	CA		12/28/2005		942,878								21,875		
1570	BEND	OR		08/12/2003		523,492								40,532		
1571	LAS VEGAS	NV		02/02/2006		1,991,449								44,301		
1573	CHANDLER	AZ		01/06/2006		1,371,347								48,828		
1574	EVERETT	WA		01/05/2006		1,600,242								56,942		
1575	RENTON	WA		03/28/2006		7,122,217								158,217		
1576	WHITE BEAR LAKE	MIN		02/21/2006		1,038,147								35,406		
1580	TROUTDALE	OR		02/23/2006		2,889,330								65,396		
1581	SEATTLE	WA		02/28/2006		1,845,421								63,019		
1582	BELLINGHAM	WA		04/18/2006		2,209,102								49,889		
1583	ESCONDIDO	CA		03/15/2006		1,107,333								37,776		
1584	LA MESA	CA		03/15/2006		1,065,829								36,351		
1586	FRESNO	CA		03/13/2006		1,233,751								27,703		
1588	ALBUQUERQUE	NM		03/21/2006		3,236,092								110,411		
1589	SCOTTSDALE	AZ		03/09/2006		2,587,718								57,494		
1590	CITRUS HEIGHTS	CA		03/15/2006		1,166,028								35,842		
1591	INDIANA	PA		04/27/2006		1,114,139								37,149		
1593	BELLEVUE	WA		05/21/1999		2,514,833								390,902		
1594	BELLEVUE	WA		05/24/2005		1,865,432								43,970		
1595	EDGEWATER	MD		03/29/2006		3,511,754								78,734		
1596	MERRIFIELD	VA		05/03/2006		7,132,751								157,576		
1597	REDMOND	WA		04/18/2006		1,546,575								33,906		
1598	GRANADA HILLS	CA		04/19/2006		736,088								40,659		
1599	SAN DIEGO	CA		04/25/2006		3,706,952								82,407		
1600	PHILLIPSBURG	PA		06/05/2006		2,284,826								73,255		
1601	WILSONVILLE	OR		05/11/2006		1,573,319								34,128		
1602	ROY	UT		04/07/2006		1,716,542								36,274		

E06.5

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
1603	LAKE FOREST	CA		05/17/2006		2,136,533								68,692		
1604	CHENEY	WA		05/01/2006		2,002,080								42,528		
1605	PARAMOUNT	CA		06/22/2006		2,203,671								68,050		
1606	MERCER ISLAND	WA		06/10/2004		1,303,661								52,187		
1607	WESTLAND	MI		05/26/2006		839,061								116,323		
1608	BELLFLOWER	CA		05/24/2006		687,701								14,440		
1609	OCEANSIDE	CA		05/31/2006		932,061								30,343		
1611	DALLAS	TX		06/19/2006		3,831,355								78,077		
1612	ENGLEWOOD	CO		07/11/2006		850,104								26,481		
1613	GOLDEN VALLEY	MN		08/03/2006		1,412,210								43,395		
1614	PLANO	TX		10/09/1999		7,195,263								288,016		
1615	TACOMA	WA		06/29/2006		1,534,377								30,521		
1616	ARCADIA	CA		05/27/2004		3,202,015								86,208		
1617	FRESNO	CA		06/27/2006		1,007,504								19,797		
1618	WINTER HAVEN	FL		07/31/2006		958,401								19,820		
1619	BELLEVUE	WA		07/19/2006		2,829,742								57,437		
1620	SALINAS	CA		08/11/2006		3,368,144								65,279		
1621	LOCUST GROVE	GA		07/10/2006		1,153,514								22,335		
1623	FRESNO	CA		09/13/2006		2,408,240								47,058		
1624	SAN JOSE	CA		07/31/2006		2,111,993								42,125		
1625	MURFREESBORO	TN		07/21/2006		3,506,091								69,001		
1626	LIVINGSTON	TN		07/26/2006		1,873,109								36,868		
1627	MUKILTEO	WA		09/28/2006		1,899,050								36,463		
1628	FLORENCE	KY		08/14/2006		1,194,712								37,144		
1630	GREENWOOD	MN		08/10/2006		961,511								19,011		
1632	LINCOLN	NE		10/12/2006		962,958								19,550		
1634	TULSA	OK		09/15/2006		1,697,559								52,404		
1635	CLACKAMAS	OR		09/29/2006		354,172								10,694		
1636	HEALDSBURG	CA		10/13/2006		2,265,559								70,965		
1638	CARROLLTON	TX		10/25/2006		524,676								26,703		
1639	FRESNO	CA		10/26/2006		806,666								29,536		
1640	BEVERLY HILLS	CA		10/23/2006		5,773,750								119,184		
1642	IRVING	TX		12/14/2006		8,158,324								171,188		
1643	STOCKTON	CA		12/11/2006		3,890,151								30,102		
1645	CAMPBELLSPORT	WI		12/28/2006		1,246,471								24,826		
1646	BELLEVUE	WA		12/21/2006		676,259								63,538		
1647	FEDERAL WAY	WA		01/12/2007		1,429,935								109,426		
1648	MEMPHIS	TN		02/08/2007		4,715,882								146,063		
1651	CENTERVILLE	UT		01/30/2007		1,861,315								37,685		
1652	RANCHO CORDOVA	CA		01/18/2007		1,763,536								36,314		
1653	TRAVERSE CITY	MI		02/20/2007		934,210								19,227		
1654	ROGERS	MN		02/22/2007		2,810,958								55,831		
1655	MONTCLAIR	CA		03/29/2007		4,299,090								131,180		
1656	DENVER	CO		02/23/2007		2,571,586								80,056		
1658	MALVERN	PA		04/11/2007		1,218,008								35,850		
1659	COLTON	CA		04/06/2007		567,217								53,908		
1660	ST LOUIS PARK	MN		04/16/2007		1,438,601								42,336		
1661	DALLAS	TX		05/16/2007		1,167,894								23,185		
1662	INDIO	CA		06/14/2007		1,803,783								35,375		
1663	SAUK RAPIDS	MN		04/11/2007		1,148,922								35,047		
1664	ORLANDO	FL		05/15/2007		711,004								97,005		
1665	LAS VEGAS	NV		05/02/2007		1,262,188								25,807		
1666	PORTLAND	OR		05/29/2007		1,168,759								22,618		
1667	OXFORD	MS		05/30/2007		945,347								18,547		
1668	OLIVE BRANCH	MS		05/30/2007		852,859								16,731		
1669	HORN LAKE	MS		05/30/2007		927,481								18,220		
1670	FRESNO	CA		05/02/2007		3,401,877								67,194		
1671	MONROE	WA		06/08/2007		1,896,312								335,042		
1672	TACOMA	WA		05/17/2007		1,193,380								22,910		
1673	CAMPBELL	CA		07/02/2007		6,583,372								126,896		
1675	TULSA	OK		07/09/2007		2,100,527								40,065		

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal	
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)						13 Total Foreign Exchange Change in Book Value
1678	FORT WORTH	TX		08/10/2007		1,040,322										29,791	
1679	SAN DIEGO	CA		06/04/2007		977,800										15,906	
1680	FLOWER MOUND	TX		06/29/2007		1,973,293										39,494	
1681	INDIO	CA		07/17/2007		1,356,817										26,788	
1682	CENTENNIAL	CO		08/20/2007		1,665,147										30,016	
1683	MANTECA	CA		07/23/2007		1,172,820										22,041	
1684	SAGINAW	TX		07/18/2007		1,685,717										31,842	
1685	PORTLAND	OR		07/20/2007		1,051,801										18,891	
1686	AUSTIN	TX		07/20/2007		1,710,244										32,232	
1687	OCALA	FL		08/15/2007		1,115,138										30,131	
1688	OLYMPIA	WA		08/31/2007		1,173,296										22,859	
1689	SEATTLE	WA		08/14/2007		6,362,461										118,124	
1690	SALEM	OR		08/29/2007		1,057,554										19,307	
1691	DANVILLE	CA		08/30/2007		680,985										59,460	
1692	SANTA ANA	CA		08/09/2007		636,623										10,933	
1694	BELLEVUE	WA		08/20/2007		5,902,337										84,056	
1695	FRESNO	CA		08/31/2007		1,077,615										19,289	
1696	FRESNO	CA		08/15/2007		2,152,760										40,544	
1697	VAN NUYS	CA		09/12/2007		1,552,707										43,577	
1698	LIBERTY LAKE	WA		09/10/2007		1,260,991										35,891	
1700	VENICE	CA		09/20/2007		754,667										9,528	
1701	VENICE	CA		09/20/2007		2,811,545										35,461	
1702	SANTA MONICA	CA		09/20/2007		2,219,646										27,991	
1703	SANTA MONICA	CA		09/20/2007		1,479,764										18,661	
1704	LYNNWOOD	WA		09/11/2007		2,329,221										65,232	
1705	BOGART	GA		09/17/2007		3,943,905										70,318	
1706	DANA POINT	CA		12/20/2007		1,383,073										19,526	
1707	CLACKAMAS	OR		09/24/2007		2,010,092										36,798	
1708	INDIO	CA		09/19/2007		2,696,060										49,707	
1709	SAN JOSE	CA		08/30/2007		1,076,099										20,496	
1710	SACRAMENTO	CA		10/18/2007		1,225,472										24,034	
1712	MODESTO	CA		10/11/2007		2,431,369										67,680	
1713	BELFAIR	WA		09/21/2007		2,957,851										84,725	
1714	BOISE	ID		10/17/2007		1,962,565										36,796	
1715	GARDNERVILLE	NV		10/04/2007		2,961,488										56,944	
1716	CENTENNIAL	CO		11/14/2007		1,733,234										22,149	
1717	SACRAMENTO	CA		09/26/2007		972,368										25,416	
1719	ELK RIVER	MN		10/12/2007		1,214,288										35,084	
1720	THOUSAND OAKS	CA		11/15/2007		1,604,340										21,944	
1722	BOZEMAN	MT		10/22/2007		1,335,447										24,190	
1723	POMONA	CA		10/31/2007		2,139,881										59,310	
1724	OXNARD	CA		11/02/2007		1,020,938										28,474	
1725	ODESSA	TX		10/09/2007		1,370,030										24,615	
1726	COLLEGE STATION	TX		10/09/2007		1,478,272										26,361	
1727	SANTA ANA	CA		10/22/2007		1,944,279										54,877	
1728	KENT	WA		10/01/2007		3,354,217										42,224	
1729	PORTLAND	OR		10/24/2007		1,718,492										31,048	
1730	CITY OF INDUSTRY	CA		10/15/2007		1,620,302										29,264	
1731	HOUSTON	TX		11/01/2007		1,310,494										179,003	
1733	BELL	CA		11/27/2007		2,205,395										100,894	
1734	CANTON TOWNSHIP	MI		11/14/2007		940,728										12,023	
1735	SHELBY TOWNSHIP	MI		11/20/2007		782,622										10,002	
1736	PEARSALL	TX		11/14/2007		691,713										8,839	
1737	FAIRBORN	OH		11/16/2007		634,084										17,049	
1738	CLEARWATER	FL		12/14/2007		2,490,982										68,301	
1739	REDWOOD CITY	CA		12/17/2007		5,221,295										91,046	
1741	HOUSTON	TX		12/03/2007		1,474,222										26,968	
1742	ORLANDO	FL		01/28/2008		966,044										43,037	
1743	ORLANDO	FL		02/05/2008		2,425,859										66,207	
1744	ORLANDO	FL		12/17/2007		4,050,000										73,305	
1745	NEWPORT BEACH	CA		02/01/2008		1,500,000											

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
1746	SPOKANE VALLEY	WA		01/18/2008		2,004,772								56,992		
1747	PHOENIX	AZ		12/27/2007		1,869,476								35,159		
1748	OMAHA	NE		01/28/2008		1,206,919								22,702		
1749	ST MICHAEL	MIN		04/15/2008		2,315,102								63,264		
1750	SAN JOSE	CA		02/13/2008		2,774,639								36,004		
1751	LEWISVILLE	TX		01/10/2008		6,069,511								150,469		
1752	JACKSONVILLE	FL		01/03/2008		983,871								18,205		
1753	SHOREVIEW	MIN		01/25/2008		1,968,800								39,085		
1754	ORLANDO	FL		02/05/2008		1,453,348								65,841		
1755	SHORELINE	WA		03/11/2008		4,265,815								77,764		
1756	LAKE OSWEGO	OR		03/28/2008		2,260,625								62,260		
1757	OLYMPIA	WA		04/22/2008		4,370,416								54,017		
1758	WESTLAKE VILLAGE	CA		03/26/2008		2,778,141								34,576		
1759	WASHINGTON	DC		03/14/2008		991,504								13,386		
1760	MOUNTLAKE TERRACE	WA		05/01/2008		2,069,363								55,620		
1761	NEWARK	CA		03/27/2008		1,834,858								23,897		
1762	BOCA RATON	FL		04/07/2008		2,770,085								47,462		
1763	JACKSONVILLE	FL		03/18/2008		1,587,627								19,580		
1764	DEVENS	MA		03/14/2008		687,941								19,060		
1765	AUSTIN	TX		04/01/2008		3,656,525								68,618		
1766	LOWELL	AR		04/10/2008		1,727,409								31,500		
1767	SEATTLE	WA		04/10/2008		2,381,189								34,009		
1768	BURNSVILLE	MIN		04/11/2008		3,655,990								169,106		
1769	DILLWORTH	MIN		04/11/2008		2,729,805								126,268		
1770	SHAKOPEE	MIN		04/25/2008		4,878,254								219,675		
1771	SPOKANE VALLEY	WA		04/25/2008		2,462,207								68,413		
1772	KENT	WA		04/23/2008		1,585,177								27,065		
1773	FIFE	WA		04/22/2008		1,781,692								33,208		
1774	OKLAHOMA CITY	OK		04/23/2008		1,256,008								79,265		
1775	HILLSBORO	OR		05/13/2008		2,773,334								55,603		
1776	SAN JOSE	CA		05/16/2008		4,023,642								55,050		
1777	ST GEORGE	UT		06/12/2008		1,688,222								29,944		
1778	WOODINVILLE	WA		05/23/2008		8,748,025								109,001		
1779	MORGAN HILL	CA		05/23/2008		521,541								7,220		
1780	EDMONDS	WA		05/15/2008		3,279,564								42,771		
1781	SAN DIEGO	CA		05/09/2008		1,987,318								26,517		
1782	SEATTLE	WA		05/23/2008		3,480,410								45,596		
1784	PHOENIX	AZ		05/19/2008		2,678,070								46,105		
1785	TUCSON	AZ		05/15/2008		1,580,507								41,014		
1786	SALEM	OR		07/30/2008		6,717,952								101,124		
1787	SPRINGFIELD	OH		06/16/2008		745,433								11,722		
1788	DAYTON	OH		06/16/2008		745,244								12,171		
1789	MORGAN HILL	CA		06/30/2008		993,319								17,045		
1790	CENTREVILLE	IL		06/30/2008		4,453,755								117,271		
1791	TURLOCK	CA		06/25/2008		2,985,169								37,813		
1792	EL PASO	TX		07/24/2008		1,180,838								28,840		
1793	PLAINWELL	MI		07/23/2008		2,541,974								31,382		
1794	PAW PAW	MI		08/27/2008		1,269,332								14,836		
1796	LUBBOCK	TX		07/22/2008		3,979,860								63,380		
1797	GRAHAM	WA		06/24/2008		3,683,841								41,566		
1798	TUCSON	AZ		07/14/2008		2,735,167								46,531		
1799	JACKSONVILLE	FL		08/01/2008		1,588,990								65,959		
1800	SEATTLE	WA		08/19/2008		5,464,642								145,241		
1801	AUSTIN	TX		09/12/2008		1,237,571								15,122		
1802	PRATVILLE	AL		08/15/2008		3,484,461								74,052		
1803	SALT LAKE CITY	UT		08/27/2008		996,196								15,526		
1804	SEATTLE	WA		08/22/2008		498,387								6,537		
1805	KIRKLAND	WA		07/31/2008		995,793								13,132		
1806	GILROY	CA		09/19/2008		2,345,724								26,700		
1807	PHOENIX	AZ		09/11/2008		3,593,086								43,079		
1808	DOWNEY	CA		09/15/2008		1,397,310								18,068		

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)					
1809	RANCHO CUCAMONGA	CA		10/02/2008		2,711,983								44,669		
1810	HOLLISTER	CA		08/27/2008		3,988,358								47,100		
1811	SAN FRANCISCO	CA		09/18/2008		1,300,000										
1812	PLANO	TX		11/13/2008		1,700,000								40,490		
1814	SPARKS	NV		08/27/2008		1,658,495								68,254		
1815	AUSTIN	TX		09/19/2008		5,834,579								96,299		
1816	PORTLAND	OR		10/24/2008		997,929								24,661		
1817	SUMNER	WA		08/16/2008		3,093,300								41,591		
1818	SUMNER	WA		09/16/2008		2,694,164								36,229		
1820	KIRKLAND	WA		09/29/2008		2,988,339								72,932		
1821	SAN JOSE	CA		11/10/2008		4,978,096								166,285		
1822	TACOMA	WA		10/06/2008		1,245,706								52,015		
1823	CORPUS CHRISTI	TX		12/01/2008		4,000,000								69,705		
1824	COLLEGE PARK	GA		10/24/2008		2,195,542								53,014		
1825	VANCOUVER	WA		12/02/2008		2,300,000								42,613		
1827	DANBURY	CT		10/14/2008		3,371,649								38,021		
1828	COLORADO SPRINGS	CO		11/19/2008		2,200,000								23,946		
1829	ROUND ROCK	TX		11/21/2008		3,000,000								38,292		
1830	VISALIA	CA		12/15/2008		3,000,000								34,320		
1831	MARION	IN		11/14/2008		2,100,000								33,175		
1832	OREGON CITY	OR		12/05/2008		2,500,000								187,736		
1833	ROYAL OAK	MI		11/21/2008		1,350,000								24,063		
1834	SANTA MONICA	CA		11/25/2008		1,900,000								20,685		
1835	CANOGA PARK	CA		11/25/2008		2,750,000								42,454		
1836	SEATTLE	WA		12/09/2008		2,250,000								88,024		
1837	VANCOUVER	WA		12/12/2008		2,000,000								227,887		
1838	LOS ANGELES	CA		01/30/2009										38,439		
1839	UNION CITY	CA		12/03/2008		2,800,000								41,645		
1841	SAN FRANCISCO	CA		12/24/2008		2,275,000								31,470		
1842	NOVI	MI		01/22/2009										46,466		
1843	SEDRO WOOLLEY	WA		12/04/2008		2,930,000								113,957		
1844	GRAND PRAIRIE	TX		01/23/2009										23,419		
1845	INGLEWOOD	CA		01/12/2009										8,275		
1846	LOS ANGELES	CA		02/26/2009										21,227		
1847	MARINA DEL RAY	CA		02/26/2009										15,636		
1848	SANTA MONICA	CA		01/29/2009										21,817		
1849	SANTA MONICA	CA		01/29/2009										12,990		
1850	SANTA CLARA	CA		02/03/2009										51,950		
1851	SANTA CLARA	CA		02/04/2009										27,310		
1852	SANTA CLARA	CA		02/04/2009										20,867		
1853	BURLINGAME	CA		02/03/2009										166,524		
1854	OLYMPIA	WA		02/05/2009										10,345		
1856	BURLINGAME	CA		02/12/2009										64,736		
1857	PASADENA	CA		06/11/2009										28,395		
1858	PLANO	TX		02/27/2009										31,734		
1859	FIFE	WA		04/17/2009										16,148		
1863	AUSTIN	TX		04/29/2009										15,122		
1864	EMERYVILLE	CA		04/15/2009										13,627		
1867	GLENDALE	AZ		04/15/2009										34,605		
1868	HOUSTON	TX		06/17/2009										13,057		
1869	ATLANTA	GA		06/01/2009										69,802		
1870	SAN MATEO	CA		05/21/2009										46,128		
1871	HOUSTON	TX		05/27/2009										24,360		
1872	KAHULUI	HI		05/15/2009										20,881		
1873	SANTA CLARA	CA		05/14/2009										54,734		
1874	HOFFMAN ESTATES	IL		06/11/2009										5,203		
1875	WOODINVILLE	WA		07/15/2009										13,306		
1876	LAS VEGAS	NV		06/11/2009										8,309		
1877	SILVERDALE	WA		07/06/2009										5,564		
1878	MONROVIA	CA		09/29/2009										4,724		
1880	WALNUT	CA		07/06/2009										26,609		

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

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Year

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/ Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					14 Book Value/ Recorded Investment Excluding Accrued Interest on Disposal	15 Consid- eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal	
	2 City	3 State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other Than Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)						13 Total Foreign Exchange Change in Book Value
1882	COLUMBUS	OH		07/30/2009													33,978
1883	PASADENA	TX		07/08/2009													11,889
1884	PORTLAND	OR		07/30/2009													16,929
1885	LONGVIEW	WA		07/30/2009													33,135
1887	PORTLAND	OR		08/11/2009													20,334
1888	PORTLAND	OR		08/11/2009													11,272
1889	PORTLAND	OR		08/11/2009													10,534
1890	PORTLAND	OR		08/11/2009													6,861
1892	RICHMOND	CA		08/31/2009													242,972
1894	ALISO VIEJO	CA		07/27/2009													27,255
1895	KENT	WA		09/01/2009													5,093
1898	STOUX FALLS	SD		09/11/2009													15,484
1902	VIENNA	VA		09/21/2009													12,980
1904	ATLANTA	GA		08/31/2009													18,931
1905	HOUSTON	TX		08/31/2009													37,872
1916	LAGUNA WOODS	CA		10/05/2009													5,036
1917	ST CHARLES	MO		10/19/2009													6,040
1921	WARREN	MI		11/04/2009													3,981
1909	EDEN PRAIRIE	MN		11/03/2009													
1910	GREENSBORO	NC		11/03/2009													
1911	NEWARK	DE		11/03/2009													
1913	IRVING	TX		12/17/2009													
1920	BURLINGAME	CA		11/12/2009													
1922	BUFFALO	NY		12/08/2009													
1923	TONOIWANDA	NY		12/11/2009													
1924	SUNNYVALE	CA		12/31/2009													
1925	MARIETTA	GA		12/28/2009													
1927	VAN NUYS	CA		12/03/2009													
1928	COEUR DALENE	ID		12/03/2009													
1929	EDMONDS	WA		12/16/2009													
1930	RENTON	WA		11/24/2009													
1931	BALTIMORE	MD		12/28/2009													
1933	LOS ANGELES	CA		12/16/2009													
1934	DANA POINT	CA		11/20/2009													
1936	TALLMADGE	OH		12/28/2009													
1938	SNOHOMISH	WA		12/22/2009													
1939	SAN DIEGO	CA		12/17/2009													
1941	ALISO VIEJO	CA		12/28/2009													
1944	HILLSBORO	OR		12/11/2009													
1945	HILLSBORO	OR		12/11/2009													
1946	HILLSBORO	OR		12/11/2009													
1947	HILLSBORO	OR		12/11/2009													
1948	HILLSBORO	OR		12/11/2009													
1950	RENO	NV		12/30/2009													
1951	RENO	NV		12/30/2009													
1953	INDIANAPOLIS	IN		12/30/2009													
ASL 20142	LOS ANGELES	CA		06/05/1995		311,173											25,242
ASL 20145	PITTSBURGH	PA		07/20/1995		265,534											30,825
ASL 20146	BERKELEY	CA		08/22/1995		265,961											30,547
0299999. Mortgages with partial repayments						956,301,945											40,837,066
0599999 - Totals						990,327,460							34,025,515	74,862,581			

EOG-10

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

**SCHEDULE BA - PART 1**

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

1 CUSIP Identification	2 Name or Description	3 Code	4 Location		6 Name of Vendor or General Partner	7 NAIC Designation	8 Date Originally Acquired	9 Type and Strategy	10 Actual Cost	11 Fair Value	12 Book/ Adjusted Carrying Value Less Encum- brances	Change in Book/Adjusted Carrying Value					18 Invest- ment Income	19 Commit- ment for Additional Invest- ment	20 Percent- age of Owner- ship												
			4 City	5 State								13 Unrealized Valuation Increase (Decrease)	14 Current Year's (Depre- ciation) or (Amorti- zation)/ Accretion	15 Current Year's Other Than Temporary Impair- ment Recogn- ized	16 Capital- ized Deferred Interest and Other	17 Total Foreign Exchange Change in Book/ Adjusted Carrying Value															
604074-AA-2	MINN MUTUAL LIFE INS CO SURPL NOTES 144A 8.250% 09/15/25			MN	Various	1FE	07/01/1996		14,379,192	14,105,890	14,295,144		(9,965)				1,152,938		0.000												
74252N-AB-5	PRINCIPAL MUTUAL INSURANCE CO SURPL NTS 144A etc.- Unaffiliated 8.000% 03/01/44			IA	Salomon	1FE	06/30/1997		20,816,846	17,514,474	20,693,172		(15,084)				1,632,800		0.000												
<b>2199999. Surplus Debentures, etc - Unaffiliated</b>																															
000000-00-0	CENTERLINE CORPORATE PARTNERS CENTERLINE CORP PARTNERS XXXV ng Tax Credit- Unaffiliated		New York	NY	Direct	UZ	06/14/2007		10,537,397	8,374,805	8,374,805		(1,012,285)						4.380												
000000-00-0	MMA Institutional Tax Credits Affordable Housing Credit- Unaffiliated		Boston	MA	Lehman Brothers, Inc	UZ	12/19/2005		24,540,517	17,409,668	17,409,668		(2,239,736)						6.960												
000000-00-0	PNC MULTIFAMILY CAPITAL PNC MULTIFAMILY CAPITAL XXXV Tax		Portland	OR	Direct	UZ	06/27/2007		14,848,157	11,459,168	11,459,168		(1,679,528)						7.640												
000000-00-0	RELATED Affordable Housing Housing		New York	NY	Lehman Brothers, Inc	UZ	10/06/2005		13,923,082	9,064,136	9,064,136		(1,277,155)						9.400												
000000-00-0	RELATED XXI Income		New York	NY	Direct	UZ	06/08/2007		14,850,000	9,522,922	9,522,922		(1,899,745)						15.590												
000000-00-0	MMA FINANCIAL ITC Affordable Housing Credit- Unaffiliated		Boston	MA	Lehman Brothers, Inc	UZ	12/28/2006		24,218,477	18,590,652	18,590,652		(2,299,369)						4.940												
000000-00-0	USA Institutional Tax Credit Affordable Housing Other		Greenwich	CT	Direct	UZ	06/24/2009		8,651,686	8,572,473	8,572,473		(79,214)						9.030												
<b>3199999. Non-Guaranteed Federal Low Income Housing Tax Credit - Unaffiliated</b>																															
000000-00-0	Virginia Historic Tax Credit		San Francisco	CA	Joe Foss and Company		08/31/2007		126,771	19,947	19,947																				
000000-00-0	Virginia Historic 09 Tax Credit		San Francisco	CA	Joe Foss and Company		04/10/2009		153,000	17,000	17,000		(136,000)																		
000000-00-0	Missouri Tax Credit		San Francisco	CA	Joe Foss and Company		08/26/2006		420,000	329,278	329,278		(37,392)																		
000000-00-0	Georgia Tax Credit		San Francisco	CA	Joe Foss and Company		12/12/2006		328,655	237,502	237,502		(28,785)																		
000000-00-0	Georgia II Tax Credit		San Francisco	CA	Joe Foss and Company		12/15/2008		297,500	62,132	62,132		(235,368)																		
000000-00-0	Missouri IIII		San Francisco	CA	Joe Foss and Company		01/01/2008		85,656				(5,656)																		
000000-00-0	Virginia Historic 08 Tax Credit		San Francisco	CA	Joe Foss and Company		06/20/2008		153,000				(17,000)																		
<b>3399999. State Low Income Housing Tax Credit - Unaffiliated</b>																															
521865-11-3	Lear Corp s- Unaffiliated			DE	Tax Free Exchange	UZ	11/18/2009		143,771	681,170	681,170		537,398						0.000												
60467R-12-6	MIRANT CORP SERIES B WARRANT Assets- Unaffiliated				Pershing/CJS Securities	L	11/01/2006		81,577	26,913	26,912		365,679		496,736				0.000												
981442-11-4	WORLD COLOR PRESS INC Admitted				Tax Free Exchange	U	09/03/2009		55,000	126,289	126,288		71,289						0.000												
981442-12-2	WORLD COLOR PRESS INC of				Tax Free Exchange	U	09/03/2009		55,000	58,839	58,839		3,839						0.000												
<b>3799999. Any Other Class of Assets - Unaffiliated</b>																															
<b>3999999. Total - Unaffiliated</b>																															
<b>4099999. Total - Affiliated</b>																															
<b>4199999 - Totals</b>																															

E07

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

**SCHEDULE BA - PART 2**

Showing Other Long-Term Invested Assets ACQUIRED AND ADDITIONS MADE December 31 of Current Year

1 CUSIP Identification	2 Name or Description	Location		5 Name of Vendor or General Partner	6 Date Originally Acquired	7 Type and Strategy	8 Actual Cost at Time of Acquisition	9 Additional Investment Made After Acquisition	10 Amount of Encumbrances	11 Percentage of Ownership
		3 City	4 State							
000000-00-0	CENTERLINE CORPORATE PARTNERS XXXV	New York	NY	Present Value Adjustment	.06/14/2007			453,964		
000000-00-0	MMA FINANCIAL ITC Affordable Housing Credit Unaffiliated	Boston	MA	Present Value Adjustment	.12/28/2006			1,282,318		
000000-00-0	MMA Institutional Tax Credits Affordable Housing Tax	Boston	MA	Present Value Adjustment	.12/19/2005			438,650		
000000-00-0	RELATED Affordable Housing Income	New York	NY	Present Value Adjustment	.10/06/2005			544,407		
000000-00-0	PNC Multifamily Capital XXXV Housing	Portland	OR	Present Value Adjustment	.06/27/2007			827,830		
000000-00-0	USA Institutional Tax Credit Affordable Housing Other	Greenwich	CT	Direct	.06/24/2009		8,651,686			
<b>3199999. Non-Guaranteed Federal Low Income Housing Tax Credit - Unaffiliated</b>							8,651,686	3,547,169		XXX
000000-00-0	Virginia Historic 09 Tax Credit	San Francisco	CA	Joe Foss and Company	.04/10/2009		144,408	8,592		
000000-00-0	Missouri III	San Francisco	CA	Joe Foss and Company	.01/01/2008			455		
<b>3399999. State Low Income Housing Tax Credit - Unaffiliated</b>							144,408	9,047		XXX
521865-11-3	Lear Corp			Tax Free Exchange	.11/18/2009		143,771			0.000
981442-11-4	WORLD COLOR PRESS INC			Tax Free Exchange	.09/03/2009		.55,000			0.000
981442-12-2	WORLD COLOR PRESS INC			Tax Free Exchange	.09/03/2009		.55,000			0.000
<b>3799999. Any Other Class of Assets - Unaffiliated</b>							253,771			XXX
<b>3999999. Total - Unaffiliated</b>							9,049,865	3,556,216		XXX
<b>4099999. Total - Affiliated</b>										XXX
<b>4199999 - Totals</b>							9,049,865	3,556,216		XXX



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

**SCHEDULE BA - PART 3**

Showing Other Long-Term Invested Assets DISPOSED, Transferred or Repaid During the Current Year

1 CUSIP Identification	2 Name or Description	Location		5 Name of Purchaser or Nature of Disposal	6 Date Originally Acquired	7 Disposal Date	8 Book/ Adjusted Carrying Value Less Encum- brances, Prior Year	Change in Book/Adjusted Carrying Value						15 Book/ Adjusted Carrying Value Less Encum- brances on Disposal	16 Consid- eration	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Invest- ment Income	
		3 City	4 State					9 Unrealized Valuation Increase (De- crease)	10 Current Year's (Depre- ciation) or (Amorti- zation)/ Accretion	11 Current Year's Other Than Temporary Impair- ment Recog- nized	12 Capital- ized Deferred Interest and Other	13 Total Change in Book/ Adjusted Carrying Value (9+10- 11+12)	14 Total Foreign Exchange Change in Book/ Adjusted Carrying Value							
000000-00-0	Missouri III	San Francisco	CA	Joe Foss and Company	01/01/2008	03/31/2009	5,201													
3399999. State Low Income Housing Tax Credit - Unaffiliated							5,201													
3999999. Total - Unaffiliated							5,201													
4099999. Total - Affiliated																				
4199999 - Totals							5,201													

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

SCHEDULE D - PART 1

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest				Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
31315M-CA-2	FARMER MAC UNSEC'D NTS				1	1,175,602		1,072,780	1,100,000	1,119,921					5.400	4.332	AO	12,705	59,400	02/24/2004	10/14/2011
313586-RC-5	FNMA SUB CAP DEBS					1,356,650		54,300	4,000,000	2,172,000					0.000	5.907	MAT			04/02/2004	10/09/2019
3136F3-5P-7	FNMA UNSEC'D NOTES			1		9,654,850		104,6120	10,000,000	9,715,635					5.240	5.583	FA	209,600	524,000	08/12/2003	08/07/2018
880591-EH-1	TENNESSEE VALLEY AUTHORITY				1	988,820		990,860	1,000,000	980,871					5.250	5.325	MS	15,458		09/16/2009	09/15/2039
912810-DV-7	U S TREASURY		SD		1	623,984		134,6950	500,000	562,603					9.250	6.721	FA	17,469	46,250	10/27/1999	02/15/2016
912810-DW-5	U S TREASURY BOND		M		1	4,020,742		123,7890	4,350,000	4,197,853					7.250	7.961	MN	40,946	315,375	06/02/1992	05/15/2016
912810-DW-5	U S TREASURY BOND		SD		1	137,500		123,7890	125,000	131,306					7.250	6.277	MN	1,177	9,063	07/28/1999	05/15/2016
912810-EC-8	U S TREASURY N/B				1	214,438		139,6880	200,000	208,289					8.875	8.220	FA	6,704	17,750	08/24/1989	02/15/2019
912810-EQ-7	U S TREASURY N/B		SD		1	1,183,359		119,4380	1,100,000	1,161,894					6.250	5.652	FA	25,968	68,750	12/13/2000	08/15/2023
912810-EH-4	U S TREASURY BONDS		SD		1	111,398		116,9840	100,000	109,344					6.000	5.140	FA	2,266	6,000	07/21/2003	02/15/2026
912828-DP-2	US TREASURY				1	99,465		100,7540	100,000	99,976					4.000	4.120	MS	1,193	4,000	04/04/2005	03/15/2010
912828-GO-7	US TREASURY				1	3,982,656		4,288,436	4,000,000	3,991,409					4.500	4.598	AO	30,829	180,000	05/15/2007	04/30/2012
<b>0199999. U.S. Governments - Issuer Obligations</b>						<b>23,549,464</b>	<b>XXX</b>	<b>27,116,410</b>	<b>26,575,000</b>	<b>24,551,768</b>		<b>151,189</b>			<b>XXX</b>	<b>XXX</b>	<b>XXX</b>	<b>364,315</b>	<b>1,230,588</b>	<b>XXX</b>	<b>XXX</b>
041792-9A-2	FHA PROJ LOAN #023-43254 (OAKNOLL)			2	1	6,593,427		100,0000	6,528,145	6,582,174					5.600	5.546	MON	30,465	365,576	04/27/2004	06/01/2036
313455-9F-6	FHA 113			2	1	143,281		100,0000	154,351	147,410					7.430	8.258	MON	956	11,468	02/20/1992	06/01/2024
32399W-9Z-6	FHA PROJECT, CITICORP PL #152			2	1	258,716		100,0000	243,973	252,204					7.430	6.906	MON	1,511	18,130	10/12/1993	09/01/2024
36184*-9A-2	FHA 221(D)4 PROJ LOAN GMAC #56			2	1	400,279		100,0000	398,783	399,389					7.430	7.399	MON	2,469	29,625	12/28/2001	11/01/2022
36202C-QX-4	GNMA II POOL #2270			2	1	18,879		114,3140	18,686	18,833					8.000	7.876	MON	125	1,495	09/14/2000	08/20/2026
36202F-BK-1	Government National Mortgage A POOL 4542			2	1	3,931,976		104,9570	3,738,897	3,931,032					5.500	4.827	MON	17,137	34,273	09/30/2009	09/20/2039
36203D-QC-7	GNMA POOL #346151			2	1	111,117		112,5650	121,417	110,863					7.500	4.920	MON	674	8,090	04/07/1993	04/15/2023
36203G-HA-4	GNMA POOL #348625			2	1	28,263		112,4540	30,918	28,227					7.500	4.237	MON	172	2,062	04/07/1993	04/15/2023
36203R-YD-5	GNMA POOL #357208			2	1	122,938		112,5650	133,725	118,798					7.500	7.197	MON	742	8,910	05/07/1993	05/15/2023
36204G-KR-2	GNMA POOL #369404			2	1	13,170		107,1590	16,345	15,254					6.500	10.690	MON	83	991	12/05/1994	02/15/2024
3620A2-T5-5	GNMA			2	1	20,331,125		103,0280	20,640,310	20,328,325					5.000	4.820	MON	83,474	417,370	06/23/2009	05/15/2039
3620A9-PZ-8	Government National Mortgage A POOL 723240			2	1	5,470,357		103,0280	5,433,091	5,273,427					5.000	4.711	MON	21,973	21,973	11/03/2009	10/15/2039
3620AA-TX-6	Government National Mortgage A POOL 724266			2	1	10,523,954		104,8950	10,479,144	9,990,108					5.500	4.409	MON	45,788	91,576	10/06/2009	09/15/2039
3620AC-6M-1	GNM 2009-20 A POOL 726376			2	1	5,314,743		103,0280	5,237,515	5,083,598					5.000	4.646	MON	21,182		11/20/2009	10/15/2039
3620AC-DA-9	GNM 2009-20 A POOL 725597			2	1	39,256,788		104,8400	39,855,389	38,015,500					5.470	5.293	MON	173,287	685,446	12/01/2009	07/20/2059
3620AC-DB-7	GNM 2009-20 A			2	1	19,104,159		104,8050	19,282,721	18,398,719					5.470	5.257	MON	83,868	249,333	12/01/2009	08/20/2059
36215K-W6-3	GNMA POOL #137569			2	1	15,438		111,5590	17,601	15,778					11.000	11.486	MON	145	1,736	10/09/1995	10/15/2015
36224L-J7-3	GNMA POOL #331586			2	1	132,034		112,5650	144,558	130,368					7.500	7.278	MON	803	9,632	04/28/1993	04/15/2023
36224P-VF-2	GNMA POOL #334614			2	1	117,861		112,5650	129,040	114,637					7.500	7.081	MON	716	8,598	04/28/1993	05/15/2023
36224S-JA-1	GNMA POOL #336957			2	1	35,695		110,7490	39,015	35,571					7.000	6.731	MON	206	2,466	09/16/1993	05/15/2023
36295P-U2-6	Government National Mortgage A POOL 676601			2	1	5,265,678		106,4500	5,320,354	4,997,979					6.500	2.204	MON	27,072	189,507	05/05/2009	11/15/2037
36295P-YT-3	Government National Mortgage A POOL 676722			2	1	5,254,520		104,8950	5,256,315	5,011,016					5.500	2.085	MON	22,967	68,901	09/18/2009	02/15/2038
36295Q-KU-3	Government National Mortgage A POOL 677207			2	1	299,595		106,4030	308,511	289,945					6.500	3.803	MON	1,571	18,846	09/17/2008	08/15/2038
36296D-LC-0	Government National Mortgage A POOL 688023			2	1	1,600,978		105,7650	1,659,566	1,569,105					6.000	4.817	MON	7,846	94,146	12/04/2008	10/15/2038
36296F-MQ-3	Government National Mortgage A POOL 689867			2	1	4,691,983		106,4030	4,829,426	4,538,798					6.500	5.373	MON	24,585	295,022	09/16/2008	09/15/2038
36296N-W7-7	Government National Mortgage A POOL 696470			2	1	704,217		106,4030	725,174	681,534					6.500	4.602	MON	3,692	44,300	09/17/2008	08/15/2038
36296Q-3N-7	Government National Mortgage A POOL 698405			2	1	21,505,307		103,0280	21,632,510	20,996,790					5.000	4.682	MON	87,487	262,460	08/18/2009	07/15/2039
36296Q-H9-3	Government National Mortgage A POOL 697856			2	1	5,534,570		104,8950	5,536,461	5,278,088					5.500	2.733	MON	24,191	72,574	09/18/2009	02/15/2039
36296H-HC-1	Government National Mortgage A POOL 704127			2	1	6,596,586		104,8950	6,705,756	6,392,815					5.500	3.603	MON	29,300	293,004	02/06/2009	01/15/2039
36297A-KW-2	Government National Mortgage A POOL 706009			2	1	7,185,292		104,8950	7,273,731	6,934,284					5.500	3.372	MON	31,782	256,614	05/05/2009	01/15/2039
36297C-YC-7	Government National Mortgage A POOL 708207			2	1	8,435,049		104,8950	8,626,898	8,224,302					5.500	4.719	MON	37,695	376,947	02/06/2009	02/15/2039
36297E-YU-3	Government National Mortgage A			2	1	65,806,979		104,5510	64,925,053	62,099,061					5.461	5.115	MON	282,602	840,267	12/01/2009	08/20/2059
36297E-YV-1	Government National Mortgage A Pool # 710024			2	1	90,924,846		104,6090	89,507,649	85,563,693					5.460	5.095	MON	389,315	1,164,288	11/01/2009	08/20/2059
362995-BA-9	FHA PROJ 236 #071-44173 SALEM			2	1	2,011,209		100,0000	2,065,905	2,033,096					8.930	9.350	MON	15,374	184,480	02/14/1991	07/01/2019
370424-AF-0	FHA (GMAC) PROJ #110 PUTABLE (GMAC)			2	1	40,056		100,0000	72,665	62,790					6.620	13.989	MON	401	5,331	06/21/1984	04/01/2014
37099Q-9X-6	FHA PROJ SECT 236 GMAC #2-236-2			2	1	264,803		100,0000	286,513	279,058					8.090	9.167	MON	1,932	23,063	05/09/1991	11/01/2014
38099Z-GM-3	FHA 221(D)4 PROJ LOAN GMAC #12			2	1	174,190		100,0000	173,682	173,682					7.430	7.438	MON	1,075	12,994	01/24/2002	06/20/2021
664355-9I-6	FHA PROJ PL# 85-1 NON-PUTABLE			2	1	128,901		100,0000	131,166	129,627					8.548	8.835	MON	934	12,711	03/10/1992	12/25/2020

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

**SCHEDULE D - PART 1**

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

1 CUSIP Identification	2 Description	Codes			6 NAIC Des.	7 Actual Cost	Fair Value		10 Par Value	11 Book/ Adjusted Carrying Value	Change in Book/Adjusted Carrying Value				Interest				Dates			
		3 C o d e	4 F o r e i g n	5 B o n d C h a r			8 R a t e U s e d t o O b t a i n F a i r V a l u e	9 F a i r V a l u e			12 U n r e a l i z e d V a l u a t i o n I n c r e a s e/ (D e c r e a s e)	13 C u r r e n t Y e a r s (A m o r t i z a t i o n) A c c r e t i o n	14 C u r r e n t Y e a r s O t h e r T h a n T e m p o r a r y I m p a i r m e n t R e c o g n i z e d	15 T o t a l F o r e i g n E x c h a n g e i n B o o k/ A d j u s t e d C a r r y i n g V a l u e	16 R a t e o f	17 E f f e c t i v e R a t e o f	18 W h e n P a i d	19 A d m i t t e d A m o u n t D u e a n d A c c r u e d	20 A m o u n t R e c e i v e d D u r i n g Y e a r	21 A c q u i r e d	22 M a t u r i t y	
<b>0399999. Total - U.S. Government Bonds</b>							362,380,654	XXX	365,614,025	350,952,389	363,501,575	185,934			XXX	XXX	XXX	1,844,234	7,466,639	XXX	XXX	
669812-B0-1	NOVA SCOTIA POWER CORP DEBS	A			1FE	4,495,500	134,2530	6,041,399	4,500,000	4,496,783		156			9.400	9.410	AO	105,750	423,000	04/08/1991	04/01/2021	
669827-D0-7	PROVINCE OF NOVA SCOTIA DEBS	A			1FE	1,034,100	111,5790	1,115,793	1,000,000	1,009,967		(2,384)			7.250	6.930	JJ	31,014	72,500	09/14/1993	07/27/2013	
683078-FY-0	ONTARIO HYDRO POWER COMMISSION DEBS	A			1FE	990,070	114,1300	1,141,296	1,000,000	996,604		893			7.450	7.570	MS	18,832	74,500	03/02/2000	03/31/2013	
748148-PD-9	PROVINCE OF QUEBEC DEBENTURES	A			1FE	1,459,900	117,6120	1,470,144	1,250,000	1,415,845		(7,470)			7.125	5.740	FA	35,130	89,063	01/16/2003	02/09/2024	
76312-BF-0	PROVINCE OF QUEBEC	A			1FE	952,680	126,2770	1,262,773	1,000,000	977,929		2,516			9.000	9.270	APR	67,500	90,000	02/25/1988	04/01/2016	
465139-DV-2	STATE OF ISRAEL-AID GTD SF BONDS	F	2		1FE	6,323,658	105,1470	6,897,156	6,559,518	6,513,772		19,315			6.800	7.160	FA	168,507	446,047	03/18/1994	02/15/2012	
B11204-ER-9	BELGIUM KINGDOM DEBS	F			1FE	2,244,000	103,6930	2,073,862	2,000,000	2,011,869		(23,469)			9.200	7.737	JUN	93,533	184,000	11/03/1992	06/28/2010	
<b>0499999. All Other Governments - Issuer Obligations</b>							17,499,908	XXX	20,002,423	17,309,518	17,422,769	(10,443)		XXX	XXX	XXX	520,266	1,379,110	XXX	XXX	XXX	XXX
<b>1099999. Total - All Other Government Bonds</b>							17,499,908	XXX	20,002,423	17,309,518	17,422,769	(10,443)		XXX	XXX	XXX	520,266	1,379,110	XXX	XXX	XXX	XXX
686080-CV-4	OR ST LOC GOVTS TAXABLE PENSION OBLIG GO LTD				1FE	4,810,000	101,4180	4,878,206	4,810,000	4,810,000					5.941	5.941	JD	23,814	285,762	05/12/2004	06/01/2018	
686080-DA-9	OR ST LOC GOVTS TAXABLE PENSION OBLIG GO LTD		2		1FE	600,000	95,4170	572,502	600,000	600,000					6.015	6.015	JD	3,008	36,090	05/12/2004	06/01/2023	
<b>1199999. U.S. States, Territories and Possessions - Issuer Obligations</b>							5,410,000	XXX	5,450,708	5,410,000	5,410,000			XXX	XXX	XXX	26,822	321,852	XXX	XXX	XXX	XXX
<b>1799999. Total - U.S. States, Territories and Possessions Bonds</b>							5,410,000	XXX	5,450,708	5,410,000	5,410,000			XXX	XXX	XXX	26,822	321,852	XXX	XXX	XXX	XXX
010781-CK-6	ALAMEDA CALIF CMNTY IMPT COMMN TAXABLE INSD			1	2FE	2,560,000	83,9820	2,149,939	2,560,000	2,560,000					6.130	6.130	MS	52,309	156,928	12/11/2003	03/01/2023	
10115P-AA-3	MERGED IMPT A2			1	2FE	4,966,400	107,9170	5,395,855	5,000,000	4,966,809		3			7.625	7.676	JJ	175,799	381,250	06/24/1997	07/15/2097	
156809-BV-6	BOSTON UNIVERSITY DEBS			2	1FE	619,448	101,1630	531,106	525,000	567,852		(9,830)			7.750	5.364	MN	6,781	40,688	01/08/2004	11/01/2013	
167484-3K-8	CERRITOS CALIF PUB FING AUTH R TAXABLE LOS			1	1FE	3,000,000	100,4190	3,012,570	3,000,000	3,000,000					6.090	6.090	JJ	91,350	182,700	06/18/2004	01/01/2023	
215457-AY-8	CHICAGO IL TAXABLE EMERGENCY TEL GOUNLTD			2		1,550,633	43,7790	1,619,823	3,700,000	2,189,746		125,102			0.000	5.970	MAT			01/28/2004	12/01/2018	
274137-WT-1	COOK CNTY ILL HIGH SCH DIST NO TAXABLE CAP APPREC			2	1FE	356,537	42,2330	437,112	1,035,000	518,060		28,457			0.000	5.730	MAT			05/15/2003	04/01/2022	
378294-B0-4	SER C			1	1FE	5,340,000	95,3220	5,090,195	5,340,000	5,340,000					5.280	5.280	JJ	140,976	281,952	05/16/2003	07/01/2023	
441110-CU-5	HOT SPRINGS ARK INDL DEV REV TAXABLE MAGIC			1	1FE	2,555,325	96,8770	2,489,739	2,570,000	2,558,655		498			6.350	6.399	MN	27,199	163,195	08/07/2003	11/01/2023	
492279-AN-4	KERN CO CA PENS FNDG BNDG SER 1995 (MBIA)			2	2FE	7,538,436	69,0380	22,475,321	32,555,000	21,449,912		1,534,117			0.000	7.560	MAT			11/10/1995	08/15/2015	
492279-AP-9	KERN CO CA PENS FNDG BNDG SER 1995 (MBIA)			2	2FE	7,652,245	63,2850	22,659,194	35,805,000	21,862,279		1,569,454			0.000	7.580	MAT			11/10/1995	08/15/2016	
492279-AQ-7	KERN CO CA PENS FNDG BNDG SER 1995 (MBIA)			2	2FE	7,573,950	57,8970	22,151,392	38,260,000	21,668,192		1,557,472			0.000	7.600	MAT			11/10/1995	08/15/2017	
492279-AR-5	KERN CO CA PENS OBL FNDG (MBIA) SERIES 95			2	2FE	1,174,066	52,6930	2,913,923	5,530,000	2,925,727		208,246			0.000	7.522	MAT			11/13/2000	08/15/2018	
492279-AS-3	KERN CO CA PENS OBL FNDG (MBIA) 95			2	2FE	2,750,469	47,9290	7,488,906	15,625,000	7,665,114		546,849			0.000	7.540	MAT			02/21/1996	08/15/2019	
504194-GE-5	LA QUINTA CALIF REDEV AGY TAX ALLOC- REDEV PROJ			1	1FE	4,000,000	92,1800	3,687,200	4,000,000	4,000,000					6.240	6.240	MS	83,200	249,600	09/03/2003	09/01/2023	
504194-GF-2	AREA #1 (TAX)			1	1FE	5,000,000	87,3150	4,365,750	5,000,000	5,000,000					6.440	6.440	MS	107,333	322,000	09/03/2003	09/01/2032	
537363-DH-3	LITTLE ROCK ARK CAP IMPT REV DOWNTOWN PKG PROJ			1	2FE	2,960,000	84,9540	2,514,638	2,960,000	2,960,000					5.250	5.250	JJ	77,700	155,400	05/29/2003	07/01/2023	
544389-V7-1	LOS ANGELES CALIF CMNTY REDEV TAXBLE - TAX ALLOC			1	2FE	2,870,604	90,9940	2,625,177	2,885,000	2,875,423		857			5.600	5.650	JJ	80,780	161,560	11/14/2003	07/01/2018	
544389-V8-9	HOLLYWOOD D			1	2FE	2,844,400	88,6900	2,545,403	2,870,000	2,850,152		1,036			6.000	6.080	JJ	86,100	172,200	11/14/2003	07/01/2022	
544389-X8-7	LOS ANGELES CALIF CMNTY REDEV TAXABLE TAX ALLOC			1	2FE	1,000,810	98,0530	980,530	1,000,000	1,000,073		(141)			4.875	4.860	JJ	24,375	48,750	12/11/2003	07/01/2010	
544389-Y9-5	SER E			1	2FE	1,040,141	93,8310	980,534	1,045,000	1,043,883		698			5.125	5.200	JJ	26,778	53,556	12/11/2003	07/01/2011	
592646-HU-0	METROPOLITAN WASHINGTON D C AR TAXABLE SER C			1	1FE	3,500,000	95,2160	3,332,560	3,500,000	3,500,000					6.000	6.000	AO	52,500	210,000	09/11/2003	10/01/2023	
59333A-DF-5	MIAMI-DADE CNTY FLA EDL FACS A TAXABLE UNIV MIAMI			2	1	3,055,000	92,0660	2,812,616	3,055,000	3,055,000					5.360	5.360	AO	40,937	163,748	01/16/2004	04/01/2024	
61308N-AL-4	SER B			1	1FE	2,305,000	94,7420	2,183,803	2,305,000	2,305,000					5.800	5.800	MN	22,282	133,690	12/11/2003	11/01/2023	
653438-AW-1	MONTGOMERY ALA SPL LODGING TAX TAXABLE WTS			1	2FE	4,650,000	97,3560	4,527,054	4,650,000	4,650,000					6.050	6.050	JJ	129,722	281,325	09/22/2003	07/15/2024	
686053-DH-9	NIAGARA FALLS N Y PUB WTR AUTH TAXABLE SER B			1	1FE	5,000,000	100,3210	5,016,050	5,000,000	5,000,000					5.373	5.373	JD	746	268,650	02/06/2004	06/30/2020	
76443N-CP-7	OREGON SCH BRDS ASSN TAXABLE PENSION GO LTD			2	2FE	7,485,000	86,9480	6,508,058	7,485,000	7,485,000					6.300	6.300	MS	157,185	471,555	08/14/2003	09/01/2025	
786106-EF-7	RICHMOND CALIF JT PWRS FING TAXABLE SER B			2	1FE	4,998,460	97,6190	14,608,683	14,965,000	14,304,307		1,001,267			0.000	7.390	MAT			07/05/1995	08/15/2010	

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest				Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/Adjusted Carrying Value	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
786106-EG-5	SACRAMENTO CO CA PENS FNDG BND SER 95A (MBIA)	.@			.1FE	5,571,721	.92	94,970	17,831,882	19,185,000	16,931,229	1,255,334			0.000	7.854	MAT			07/31/1995	08/15/2011
786106-EJ-9	SACRAMENTO CO CA PENS FNDG BND SER 95A (MBIA)	.@			.1FE	3,785,879	.81	730	11,801,812	14,440,000	11,048,088	787,193			0.000	7.530	MAT			07/05/1995	08/15/2013
786106-EN-0	SACRAMENTO CO CA PENS FNDG BND SER 95A (MBIA)	.@			.1FE	5,476,032	.58	0680	16,723,584	28,800,000	16,250,701	1,175,352			0.000	7.650	MAT			07/05/1995	08/15/2017
786128-AC-2	CNTY PJ SER B		1		.1FE	2,425,000	.94	7040	2,296,572	2,425,000	2,425,000				6.140	6.140	JD	12,408	148,895	12/12/2003	12/01/2023
797300-D8-0	SAN DIEGO CALIF REDEV AGY CITY HEIGHTS		1		.1FE	2,912,712	.73	4980	2,190,240	2,980,000	2,917,926	1,058			6.500	6.676	MS	64,567	193,700	01/08/2004	09/01/2033
798147-UW-2	PJ-J		1		.1FE	7,471,275	.84	7970	6,359,775	7,500,000	7,477,310	1,012			5.250	5.280	FA	164,063	393,750	07/02/2003	08/01/2024
810759-PB-0	SCRANTON PENN GO UNLTD SER D		1		.3FE	4,566,650	.82	8640	3,811,744	4,600,000	4,573,503	1,268			5.500	5.561	MS	84,333	253,000	07/11/2003	09/01/2023
91335T-AB-7	UNIVERSITY ROCHESTER N Y DIRECT NT OBLIG - TAX		2		.1FE	995,280	.95	3340	953,340	1,000,000	996,310	176			5.750	5.790	JJ	28,750	57,500	11/13/2003	07/01/2023
95648X-AN-5	WEST VIRGINIA ECON DEV AUTH EXCESS LOTTERY -TAX		2		.1FE	2,000,000	.97	4320	1,948,640	2,000,000	2,000,000				6.070	6.070	JJ	60,700	121,400	01/14/2004	07/01/2026
977100-AC-0	WISCONSIN ST GEN REV TAXABLE SER A		2		.1FE	2,292,893	.94	9560	2,183,988	2,300,000	2,293,885	222			5.700	5.725	MN	21,850	131,100	12/10/2003	05/01/2026
98458P-AA-3	YALE UNIVERSITY CN NOTES		1		.1FE	9,965,900	.96	5070	9,650,710	10,000,000	9,966,240	4			7.375	7.400	AO	155,694	737,500	04/03/1996	04/15/2096
1899999	U.S. Political Subdivisions - Issuer Obligations					145,810,266	XXX	230,855,418	307,455,000	234,181,376	9,785,704				XXX	XXX	XXX	1,976,417	5,935,592	XXX	XXX
2499999	Total - U.S. Political Subdivisions Bonds					145,810,266	XXX	230,855,418	307,455,000	234,181,376	9,785,704				XXX	XXX	XXX	1,976,417	5,935,592	XXX	XXX
13033E-NC-3	CA HFA II TAXABLE 1995 SERIES C-3		1		.1FE	8,476,820	.99	8810	8,325,081	8,335,000	8,457,910	(1,997)			8.100	7.956	FA	281,306	675,135	07/25/1996	02/01/2037
298263-VK-7	EULESS TX WTR & SWR - CTF5 OBLIG		1		.1FE	4,822,630	100	8360	4,951,048	4,910,000	4,840,554	1,855			8.125	8.282	FA	166,224	398,938	10/26/2000	08/01/2010
362832-AV-9	GAINESVILLE FLA PENSION OBLIG TAXABLE SER A	.@			.1FE	859,680	.27	7370	832,110	3,000,000	1,293,959	76,763			0.000	6.210	MAT			04/21/2003	10/01/2023
39753M-D0-8	SER B ACA CBI		2		.2FE	5,026,560	.99	4110	4,453,613	4,480,000	4,779,147	(42,655)			7.250	5.864	AO	81,200	324,800	02/27/2003	10/01/2015
432321-EF-0	HILLSBOROUGH CO FL IDA TAXABLE HLTH FACS PJ UNIV B		2		.2FE	1,006,302	100	6790	971,552	965,000	986,971	(3,923)			7.400	6.817	FA	26,977	71,410	03/17/2004	08/15/2014
451443-NH-4	ID BLDG AUTH FACILITIES SER B		2		.1FE	12,686,360	.91	9720	11,427,521	12,425,000	12,650,402	(6,012)			5.980	5.824	MS	247,672	743,015	01/23/2003	09/01/2029
452874-EF-3	PARTN INDIAN WELLS CALIF REDEV AGY TAXABLE TAX ALLOC		1		.1FE	5,000,000	.93	0630	4,653,150	5,000,000	5,000,000				5.840	5.840	JJ	146,000	292,000	04/06/2004	07/01/2027
45455C-DS-4	CONS A T		1		.1FE	6,500,000	.84	4430	5,488,795	6,500,000	6,500,000				5.460	5.460	MS	118,300	354,900	05/08/2003	09/01/2022
525555-AB-4	LELAND STANFORD JR UNIV CALIF REV TAXABLE		1		.1FE	2,617,190	113	0320	2,571,478	2,275,000	2,545,945	(12,334)			6.875	5.638	FA	65,169	156,406	03/31/2003	02/01/2024
54438E-ER-5	LOS ANGELES CALIF CMNTY REDEV AUTH REV TAX FING-PICO I		2		.2FE	2,723,122	.92	7830	2,546,893	2,745,000	2,735,773	2,238			5.000	5.102	MS	45,750	137,250	06/05/2003	09/01/2013
54438E-EX-2	LOS ANGELES CALIF CMNTY REDEV TAXABLE COUNCIL		1		.1	2,775,000	.82	8400	2,298,810	2,775,000	2,775,000				6.230	6.230	MS	57,628	172,883	08/27/2003	09/01/2023
54474C-CX-3	LOS ANGELES CNTY CALIF PENSION PENS OBL CAB SER D (MBIA)	.@			.1FE	10,986,679	.98	5850	29,575,500	30,000,000	28,980,666	1,946,116			0.000	7.074	MAT			01/12/1996	06/30/2010
586606-AZ-8	MENDOCINO CNTY CALIF PENSION O REF TAXABLE		1		.1FE	3,782,449	101	5640	3,813,728	3,755,000	3,765,744	(2,749)			5.000	4.910	JJ	93,875	187,750	12/13/2002	07/01/2013
592190-JM-5	METROPOLITAN NASHVILLE ARPT AUTH REV ARPT-IMPT TAX SER B		2		.1FE	2,807,558	.92	8000	2,552,000	2,750,000	2,796,111	(2,230)			5.820	5.641	JJ	80,025	160,050	11/18/2003	07/01/2023
59333J-CC-4	MIAMI-DADE CTY HSG FIN AUTH M/F REV TAXMTG-APTS2B		1		.1FE	1,049,821	101	9500	1,055,183	1,035,000	1,039,542	(1,527)			8.150	7.959	FA	35,147	84,353	08/03/2000	08/01/2012
617734-AC-2	MORONGO BAND OF MISSION 144A		2		.2	6,700,000	.84	4050	5,655,135	6,700,000	6,700,000				6.900	6.900	MS	154,100	462,300	03/26/2008	03/01/2018
649901-ZW-8	NEW YORK ST DORM AUTH REV TAXABLE ST PERSONAL INCOME B		1		.1FE	2,415,000	100	5930	2,429,321	2,415,000	2,415,000				4.540	4.540	MS	32,283	109,641	12/19/2002	03/15/2010
650034-YH-8	NEW YORK ST UDC TAXABLE PERSONAL INCOME TAX C2		2		.1FE	1,581,315	103	0120	1,627,590	1,580,000	1,580,444	(125)			5.150	5.140	MS	23,959	81,370	12/12/2002	03/15/2013
650370-AB-8	NEWARK N J HSG AUTH SPL OBLIG PENS TAXABLE ACA		2		.2	1,552,200	.79	7490	1,244,084	1,560,000	1,555,773	728			5.550	5.614	JD	7,215	86,580	04/06/2004	12/01/2014
65537Y-AE-0	Non-Profit PFD FD TR I VAR STS Revenue Bond 144A		5*			848,300	.75	4410	641,249	850,000	848,371	7			12.000	6.511	MS	30,033	144,600	02/20/2007	09/15/2037
658196-H4-5	NC EASTN MPA TAXABLE SER G		2		.2FE	1,160,318	101	2800	1,144,464	1,130,000	1,144,114	(3,098)			5.550	5.200	JJ	31,358	62,715	01/21/2004	01/01/2014
658196-H6-0	NC EASTN MPA PIWR SYS REV TAXABLE SER 2003E		2		.2FE	3,240,000	101	5160	3,289,118	3,240,000	3,240,000				5.230	5.230	JJ	84,726	169,452	05/09/2003	01/01/2011
658196-H8-6	NC EASTN MPA TAXABLE SER E		2		.2FE	1,699,515	101	1370	1,663,704	1,645,000	1,670,293	(5,564)			5.550	5.120	JJ	45,649	91,298	01/16/2004	01/01/2014
658196-H9-4	NC EASTN MPA PIWR SYS REV TAX BND SER E		2		.2FE	4,402,820	.94	1570	3,949,886	4,195,000	4,367,725	(6,194)			6.580	6.171	JJ	138,016	276,031	05/16/2003	01/01/2026
681766-CU-3	OMAHA NEB PKG FACS CORP LEASE SER 2003-B		2		.1FE	1,070,000	101	1220	1,082,005	1,070,000	1,070,000				4.850	4.850	MS	17,298	51,895	02/20/2003	03/01/2015
68428L-CK-8	ORANGE CO CA TXBL PENS OB SER 97A (MBIA)	.@			.1FE	1,123,459	.98	4990	3,001,265	3,047,000	2,901,791	204,942			0.000	7.460	MAT			01/14/1997	09/01/2010
68583R-AQ-5	OR CMNTY COLLEGE DIST TAX SER A	.@			.1FE	4,145,717	.57	4510	5,768,080	10,040,000	6,120,624	346,307			0.000	5.910	MAT			04/10/2003	06/30/2018
68583R-AT-9	OR CMNTY COLLEGE DIST TAX SER A	.@			.1FE	3,970,266	.44	2850	5,318,629	12,010,000	9,965,277	352,251			0.000	6.180	MAT			04/10/2003	06/30/2021
750740-BC-5	RAIL CONNECTIONS INC MASS REV TAXABLE-RTE 128 PKG-ACA-CBI		2		.1FE	1,247,672	108	0000	1,420,200	1,315,000	1,280,753	4,695			8.000	8.604	JJ	52,600	105,200	01/11/2000	07/01/2015

E10.2

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
796300-AL-5	SAN ANTONIO TEX INDL DEV CORP TAX STARBRIGHT PROJ			1	1FE	11,000,000	82.9160	9,120,760	11,000,000	11,000,000					5.110	5.110	FA	212,349	562,100	06/12/2003	08/15/2033
796825-AU-1	SAN BERNARDINO CO CA PENS OBL REV CABS (MBIA)	0			2FE	8,824,800	74.1170	22,235,100	30,000,000	23,355,745		1,576,082			0.000	7.110	MAT			01/23/1996	08/01/2013
796825-AW-7	SAN BERNARDINO CO CA PENS OBL REV CAB (MBIA)	0			2FE	4,895,800	60.0130	12,002,600	20,000,000	13,376,730		929,750			0.000	7.335	MAT			01/12/1996	08/01/2015
797299-AT-1	SAN DIEGO CA PUB FAC FIN AUTH TXBL LSE REV BND				2FE	2,299,718	99.1240	2,314,545	2,335,000	2,321,102		2,388			7.400	7.552	FA	71,996	172,790	01/03/1997	02/01/2016
829788-AU-2	SISTERS PROVIDENCE OBL GRP SER 1997			2	1FE	3,173,417	104.4350	3,321,033	3,180,000	3,177,426		236			7.700	7.723	AO	61,215	244,860	03/21/1997	10/01/2017
873521-AT-5	CITY OF TACOMA WA LEASE REV			2	1FE	23,730,000	117.0350	27,772,406	23,730,000	23,730,000					9.350	9.350	MS	653,300	2,218,755	03/28/1990	03/15/2022
88948A-AR-8	TOLL ROAD INV PART II PROJ REV BONDS MBIA-144A	0			2FE	3,532,518	65.5980	7,478,149	11,400,000	7,157,053		524,025			0.000	7.750	MAT			09/13/2000	02/15/2016
88948A-AS-6	TOLL ROAD INV PART II REV MBIA-144A	0			2FE	10,325,100	61.2230	23,325,811	38,100,000	22,366,689		1,611,695			0.000	7.620	MAT			08/25/1999	02/15/2017
88948A-AT-4	TOLL ROAD INV PART II REV MBIA 144A	0			2FE	1,075,410	55.3780	2,492,028	4,500,000	2,371,283		179,851			0.000	8.045	MAT			12/17/1999	02/15/2018
897818-DB-3	TRUCKEE-DONNER PUB UTIL DIST C TAXABLE SER B	2		2		3,080,000	91.0040	2,802,923	3,080,000	3,080,000					5.750	5.750	JJ	88,550	177,100	03/28/2003	01/01/2013
<b>2599999. U.S. Special Revenues - Issuer Obligations</b>						<b>178,213,516</b>	<b>XXX</b>	<b>236,616,547</b>	<b>289,072,000</b>	<b>241,943,917</b>		<b>7,671,521</b>			<b>XXX</b>	<b>XXX</b>	<b>XXX</b>	<b>3,149,920</b>	<b>8,775,577</b>	<b>XXX</b>	<b>XXX</b>
31288E-Y3-5	FHLMC POOL #C76130			2	1	1,516,621	103.0350	1,572,474	1,526,159	1,516,919		(373)			5.000	5.198	MON	6,359	76,308	02/13/2003	02/01/2033
31288E-Q2-1	FHLMC POOL #C77673			2	1	4,015,851	102.9580	4,160,656	4,041,108	4,017,214		(60)			5.000	5.133	MON	16,838	202,055	02/13/2003	03/01/2033
31288E-S5-2	FHLMC POOL #C77740			2	1	622,456	102.9580	644,901	626,371	622,565		(280)			5.000	5.280	MON	2,610	31,319	02/13/2003	03/01/2033
31288W-EB-9	FHLMC POOL #406430 (ARM)			2	1	47,134	102.6570	48,569	47,312	47,129		(9)			3.250	3.270	MON	128	1,853	03/26/1992	03/01/2022
31292G-LB-7	FHLMC POOL #00351			2	1	43,692	114.6940	50,490	44,022	43,718		(5)			8.000	8.271	MON	293	3,522	09/06/1994	07/01/2024
31296L-PK-1	FHLMC POOL #A12226			2	1	1,485,762	102.9580	1,545,322	1,500,921	1,486,236		(1,030)			5.000	5.297	MON	6,254	75,046	12/23/2003	08/01/2033
31360A-KH-8	FNMA POOL #296			2	1	3,971	108.5230	4,397	4,052	4,004		(48)			13.250	14.024	MON	45	537	10/28/1982	09/01/2011
31362N-YL-4	FNMA POOL #66415 (ARM)			2	1	114,831	103.8930	120,615	116,096	115,402		94			5.066	5.196	MON	490	6,427	09/16/1993	07/01/2017
31362W-T2-2	FNMA DUS POOL #73686 (30/19)			2	1	4,362,541	114.9980	4,835,495	4,204,859	4,252,890		(12,576)			7.960	7.592	MON	27,892	334,707	01/07/1997	10/01/2026
31362W-3B-0	FNMA DUS POOL #73694 (30/15)			1	1	2,056,485	106.7540	2,154,979	2,018,636	2,041,330		(1,455)			8.060	7.938	MON	13,559	162,702	09/10/1996	10/01/2026
31362W-FN-1	FNMA DUS POOL #73073 (M/F) (25/15)			1	1	3,938,670	100.8750	3,652,417	3,620,725	3,773,394		(14,526)			8.900	7.963	MON	26,854	322,244	08/23/1995	02/01/2020
31362W-TC-0	FNMA DUS POOL #73447 (30/30/20)			2	1	4,122,604	113.1900	4,388,015	3,876,677	4,039,954		(8,762)			7.400	6.816	MON	23,906	286,874	11/20/1998	05/01/2026
31362W-VL-7	FNMA DUS POOL #73519 (20/20/15)			2	1	4,807,590	106.9520	4,460,238	4,170,314	4,505,147		(51,877)			7.600	5.014	MON	26,412	316,944	01/06/2004	07/01/2016
31362W-WM-4	FNMA DUS POOL #73552 (30/20)			1	1	3,358,452	105.8670	3,486,832	3,293,609	3,331,896		(2,493)			7.950	7.820	MON	21,820	261,842	06/05/1996	07/01/2026
31362W-X0-4	FNMA DUS POOL #73587 (30/20)			1	1	1,669,259	110.7120	1,843,824	1,665,424	1,665,240		(640)			7.865	7.915	MON	10,915	130,896	07/05/1996	07/01/2026
31362X-CA-0	FNMA DUS POOL #73865 (30/18/15)			1	1	2,191,817	106.9610	2,207,774	2,064,101	2,112,320		(10,776)			7.000	5.940	MON	12,041	144,487	03/06/2002	01/01/2015
31362X-DB-7	FNMA DUS POOL #73898 (30/18/15)			2	1	2,693,002	106.8950	2,768,787	2,590,203	2,617,801		(7,234)			6.965	6.420	MON	15,034	180,408	03/31/1998	01/01/2015
31362X-DC-5	FNMA DUS POOL #73899 (30/18/15)			2	1	3,597,288	106.8950	3,706,320	3,467,265	3,501,629		(9,208)			6.965	6.451	MON	20,125	241,495	03/30/1998	01/01/2015
313637-CF-5	FNMA DUS POOL #109070 (25/18/17.5)			2	1	2,337,145	111.8960	2,532,843	2,263,579	2,286,715		(4,983)			6.640	6.221	MON	12,525	150,302	08/25/1998	02/01/2016
313637-EB-9	FNMA DUS POOL #109159 (30/18/17.5)			2	1	2,088,451	110.1660	2,225,651	2,020,267	2,041,306		(4,601)			6.720	6.270	MON	11,313	135,762	07/22/1998	11/01/2015
313637-EV-8	FNMA DUS POOL #109148 (30/18/17.5)			2	1	79,188	113.5070	87,107	76,742	77,461		(164)			7.000	6.593	MON	448	5,372	12/16/1997	12/01/2015
31368H-NN-9	Fannie Mae			2	1	21,308,571	102.7240	21,382,845	20,815,822	21,304,193		(4,378)			5.000	4.659	MON	86,733	260,198	08/27/2009	09/01/2039
31371N-MG-7	FNMA POOL #256959			2	1	12,162,735	106.0780	12,782,166	12,049,769	12,159,224		(930)			6.000	5.617	MON	60,249	722,986	10/29/2007	11/01/2037
31377E-UE-7	FNMA DUS POOL #375081 (30/18/15)			1	1	3,726,345	108.8170	3,779,644	3,473,398	3,571,211		(20,638)			7.500	6.295	MON	21,709	260,505	08/19/2002	04/01/2015
31377E-V2-2	FNMA DUS POOL #375133 (30/30/15)			2	1	2,151,560	107.6660	2,267,601	2,106,146	2,134,698		(1,660)			7.790	7.636	MON	13,672	164,069	05/07/1997	05/01/2027
31377E-X6-1	FNMA DUS POOL #375201 (30/18/15)			2	1	3,281,805	109.0630	3,314,106	3,038,708	3,117,484		(15,920)			7.435	6.353	MON	18,827	225,928	06/25/1998	06/01/2015
31377E-DA-1	FNMA DUS POOL #375497 (30/18/15)			2	1	1,929,424	108.3390	1,983,690	1,831,007	1,862,613		(6,349)			6.920	6.233	MON	10,559	126,706	04/03/1998	11/01/2015
31377E-GU-4	FNMA DUS POOL #375611 (30/30/15)			2	1	2,417,735	107.0330	2,534,713	2,368,152	2,399,879		(1,779)			7.000	6.847	MON	13,814	165,771	12/17/1997	01/01/2028
31377L-EF-6	FNMA DUS POOL #380034 (30/30/15)			2	1	1,197,687	106.7050	1,268,281	1,188,587	1,193,401		(426)			6.840	6.816	MON	6,775	81,299	12/16/1997	01/01/2028
31377L-HC-0	FNMA DUS POOL #380127 (30/17/15)			2	1	526,281	112.0240	532,334	475,198	492,927		(3,378)			7.910	6.408	MON	3,132	37,588	01/05/1999	07/01/2015
31377L-HE-6	FNMA DUS POOL #380129 (30/17/15)			2	1	44,301	112.0240	44,810	40,001	41,493		(284)			7.910	6.408	MON	264	3,164	01/05/1999	07/01/2015
31377L-SE-4	FNMA DUS POOL #380417 (25/25/20)			2	1	5,595,172	110.1350	6,093,666	5,532,926	5,562,558		(3,273)			6.470	6.389	MON	29,832	357,980	06/24/1998	07/01/2023
31377M-3P-4	FNMA DUS POOL #381606 (30/17/15)			2	1	1,244,617	109.4500	1,288,920	1,177,639	1,201,104		(4,559)			7.400	6.590	MON	7,262	87,145	04/19/1999	10/01/2015
31377M-E2-3	FNMA DUS POOL #380953 (13.5/13.5/13)			2	1	2,272,747	107.5670	2,320,364	2,157,138	2,170,201		(10,070)			6.800	5.898	MON	12,224	146,685	11/20/1998	02/01/2012
31377M-E4-9	FNMA DUS POOL #380955 (13.5/13.5/13)			2	1	2,430,549	107.4550	2,518,107	2,343,404	2,351,512		(7,795)			6.580	5.956	MON	12,850	154,196	11/20/1998	03/01/2012
31377M-KS-9	FNMA DUS POOL #381105 (30/17.5/15)			1	1	751,57															

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

**SCHEDULE D - PART 1**

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

1 CUSIP Identification	2 Description	Codes			6 NAIC Des.	7 Actual Cost	Fair Value		10 Par Value	11 Book/ Adjusted Carrying Value	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3 Code	4 Foreign	5 Bond Char			8 Rate Used to Obtain Fair Value	9 Fair Value			12 Unrealized Valuation Increase/(Decrease)	13 Current Year's (Amortization) Accretion	14 Current Year's Other Than Temporary Impairment Recognized	15 Total Foreign Exchange Change in Book/ Adjusted Carrying Value	16 Rate of	17 Effective Rate of	18 When Paid	19 Admitted Amount Due and Accrued	20 Amount Received During Year	21 Acquired	22 Maturity
31377R-FU-9	FNMA DUS POOL #384579 (25/10/8)			2	1	270,159	99,9040	247,471	247,710	252,934	(3,000)				5.730	3.313	MON	1,183	14,194	03/18/2004	12/01/2011
31377R-UP-3	FNMA DUS POOL #384990 (30/18/15)			1	1	2,258,788	110,7610	2,295,274	2,072,282	2,185,157	(10,749)				6.570	5.416	MON	1,346	136,149	09/20/2002	04/01/2020
31377S-AA-0	FNMA DUS POOL #385327 (30/15/14.5)			1	1	961,286	107,6560	978,607	909,017	935,644	(3,693)				6.160	5.307	MON	4,666	55,995	09/10/2002	08/01/2017
31377S-D8-8	FNMA DUS POOL #385427 (30/13.6/13)			1	1	3,223,994	108,3920	3,436,563	3,170,492	3,190,627	(4,838)				5.760	5.482	MON	15,218	182,620	08/16/2002	03/01/2016
31377S-UL-0	FNMA DUS POOL #385887 (30/18/15)			2	1	597,654	103,4310	569,402	550,516	580,707	(2,686)				5.330	4.257	MON	2,445	29,343	06/11/2003	01/01/2021
31377S-VH-8	FNMA DUS POOL #385916 (30/18/15)			1	1	2,494,283	103,5690	2,545,115	2,457,422	2,478,731	(2,403)				5.370	5.189	MON	10,997	131,963	01/27/2003	03/01/2021
31377T-AB-2	FNMA DUS POOL #386202 (30/15/14.5)			2	1	752,017	105,6440	705,599	667,903	715,395	(5,727)				5.480	3.704	MON	3,152	37,110	06/12/2003	05/01/2018
31377T-B5-4	FNMA DUS POOL #386260 (30/18/15)			2	1	1,384,314	99,1890	1,339,389	1,350,345	1,371,659	(2,013)				4.700	4.388	MON	5,289	63,466	05/23/2003	06/01/2021
31377T-RF-5	FNMA DUS POOL #386686 (30/18/15)			2	1	1,717,216	104,0970	1,725,039	1,657,144	1,697,486	(3,464)				5.520	5.066	MON	7,623	91,474	01/14/2004	12/01/2021
31377T-R6-3	FNMA DUS POOL #386687 (30/18/15)			2	1	1,273,235	104,6110	1,276,112	1,219,866	1,255,905	(3,033)				5.600	5.052	MON	5,693	68,313	01/13/2004	12/01/2021
31377T-RH-1	FNMA DUS POOL #386688 (30/18/15)			2	1	1,666,257	104,6110	1,670,021	1,596,413	1,643,576	(3,969)				5.600	5.052	MON	7,450	89,399	01/13/2004	12/01/2021
31377T-SZ-0	FNMA DUS POOL #386736 (30/30/20)			2	1	3,838,726	102,0050	3,890,167	3,813,698	3,832,964	(1,021)				5.480	5.450	MON	17,996	211,893	11/20/2003	01/01/2034
31377T-VU-7	FNMA DUS POOL #386827 (30/18/15)			2	1	2,869,499	102,1110	2,922,753	2,862,343	2,864,551	(887)				5.230	5.209	MON	12,891	151,780	01/28/2004	02/01/2022
31381G-HK-1	FNMA DUS PL #460362 (40/15.5/15.25)			2	1	3,105,766	111,9880	3,386,822	3,024,286	3,052,977	(6,816)				6.631	6.205	MON	17,269	203,326	08/21/2001	09/01/2015
31381G-UR-7	FNMA DUS POOL #460608 (30/20/19.5)			2	1	3,279,966	108,5820	3,305,280	3,044,052	3,197,599	(12,077)				6.150	5.238	MON	15,601	187,209	10/08/2002	03/01/2022
31407N-B2-8	FNMA Pool #835357			2	1	16,263,555	100,2920	17,286,037	17,235,760	16,309,728	(23,287)				4.500	5.483	MON	64,634	775,609	10/12/2005	09/01/2025
31410K-C3-6	FANNIE MAE POOL 889390			2	1	11,373,693	106,9820	11,975,025	11,193,547	11,365,961	(3,762)				6.000	5.111	MON	55,968	671,613	07/25/2008	03/01/2023
31412Q-BN-8	FANNIE MAE			2	1	23,684,205	102,7240	23,797,635	23,166,577	23,678,193	(6,012)				5.000	4.557	MON	96,527	386,110	07/15/2009	07/01/2039
31412U-H3-7	FANNIE MAE POOL 935050			2	1	6,745,053	102,7240	6,742,979	6,548,595	6,742,200	(2,853)				5.000	4.337	MON	27,286	191,001	05/06/2009	03/01/2039
31413J-J7-7	FNMA Pool #959386			2	1	3,604,621	105,9650	3,712,415	3,503,422	3,599,413	(4,614)				5.500	4.787	MON	16,057	192,688	12/22/2008	12/01/2022
31413Y-L6-6	FNMA Pool #959449			2	1	17,217,751	105,9650	17,732,639	16,734,367	17,204,000	(11,649)				5.500	3.688	MON	76,699	920,390	12/22/2008	12/01/2022
31414J-KK-8	FANNIE MAE POOL 967498			2	1	523,284	104,7920	540,587	515,868	523,048	(97)				5.500	4.762	MON	2,364	28,373	02/06/2008	01/01/2038
31414P-AZ-9	FANNIE MAE POOL 972540			2	1	1,458,792	104,7920	1,486,875	1,418,886	1,458,146	(646)				5.500	4.293	MON	6,503	65,032	02/13/2009	02/01/2038
31415Y-XT-1	FANNIE MAE POOL 993590			2	1	9,542,035	102,7340	9,530,404	9,276,777	9,538,485	(3,550)				5.000	4.626	MON	38,653	231,919	05/22/2009	05/01/2039
31416H-Q3-2	FANNIE MAE POOL AA0473			2	1	20,007,024	102,7240	20,192,339	19,656,885	19,998,344	(8,680)				5.000	4.209	MON	81,904	737,133	02/26/2009	03/01/2039
31416M-KD-5	Fannie Mae			2	1	11,723,041	102,7340	11,731,920	11,419,705	11,713,433	(9,609)				5.000	3.177	MON	47,582	142,746	08/31/2009	03/01/2039
31416R-GU-1	FANNIE MAE POOL AA7410			2	1	9,141,105	102,7240	9,158,289	8,915,433	9,138,095	(3,010)				5.000	4.654	MON	37,148	222,886	05/29/2009	05/01/2039
31416R-PC-1	FANNIE MAE POOL AA7618			2	1	11,667,602	102,7340	11,628,650	11,319,184	11,662,820	(4,782)				5.000	4.440	MON	47,163	330,143	05/06/2009	05/01/2039
31417S-7M-6	Fannie Mae POOL AC6299			2	1	9,811,523	102,7240	9,630,375	9,375,000	9,810,640	(884)				5.000	4.627	MON	39,063	218,969	12/08/2009	12/01/2039
31418M-JT-8	Fannie Mae POOL AD0285			2	1	23,831,766	105,1060	23,704,169	22,552,610	23,812,974	(18,792)				5.000	3.105	MON	93,969	93,969	10/22/2009	09/01/2022
<b>2699999. U.S. Special Revenues - Single Class Mortgage-Backed/Asset-Backed Securities</b>						318,687,149	XXX	324,860,772	309,967,238	316,224,386	(405,444)				XXX	XXX	XXX	1,464,330	12,995,512	XXX	XXX
312906-J5-0	FHLMC REMIC SER 198-Z			2	1	320,049	110,7810	401,846	362,738	338,936	3,252				8.500	10.961	MON	1,370	30,833	08/15/1991	09/15/2022
312916-FL-8	FHLMC REMIC SER 1526-L (B-PAC)			2	1	1,874,358	107,2730	2,215,630	2,065,408	1,991,232	9,267				6.500	7.619	MON	11,188	134,252	06/01/1993	06/15/2023
312916-ZY-8	FHLMC REMIC SER 1562 Z (ACRL)			2	1	2,815,313	108,9690	3,250,987	2,983,411	2,894,134	6,234				7.000	8.033	MON	17,403	208,838	01/10/2001	07/15/2023
31339L-HN-7	FHLMC REMIC SER 2395 VB (VADM)			2	1	5,593,962	105,5310	6,195,696	5,871,000	5,796,822	63,439				6.000	6.718	MON	29,355	352,260	12/07/2001	05/15/2019
31339L-MQ-0	FHLMC REMIC SER 2395 VA (VADM)			2	1	697,591	103,2090	671,013	650,150	660,817	(10,040)				6.000	2.378	MON	3,251	39,009	12/12/2002	02/15/2011
31339L-XI-5	FHLMC REMIC SER 2391 VQ (VADM)			2	1	85,652	103,5770	84,153	81,247	82,116	(880)				6.000	3.892	MON	406	4,875	10/15/2002	04/15/2011
31339N-TZ-9	FHLMC REMIC SER 2428 ED (B-PAC)			2	1	6,318	107,1250	6,793	6,341	6,323	1				6.000	6.103	MON	32	380	04/26/2002	03/15/2017
313370-J7-0	FHLMC REMIC SER 1578 K (B-PAC)			2	1	704,013	106,5560	788,282	739,784	724,471	1,865				6.900	7.584	MON	4,254	51,045	10/13/2000	09/15/2023
313370-VX-9	FHLMC REMIC SER 1560 Z (PAC Z)			2	1	13,137,217	108,9690	15,616,880	14,331,515	13,707,901	114,299				7.000	8.614	MON	83,601	1,003,207	03/22/2002	08/15/2023
313370-Y6-5	FHLMC REMIC SER 1572 ZZ			2	1	3,356,363	99,9460	3,620,369	3,622,321	3,477,758	5,345				7.000	8.281	MON	21,130	219,300	01/28/1997	09/15/2023
313372-4T-4	FHLMC REMIC SER 1648-G (PAC1)			2	1	2,610,131	107,9690	3,465,795	3,210,000	3,028,105	70,381				6.000	8.006	MON	16,050	192,600	04/14/1994	12/15/2023
313373-3F-3	FHLMC REMIC SER 1676 KZ (PAC Z)			2	1	7,223,872	107,0310	8,459,388	7,903,658	7,580,493	84,460				6.500	8.033	MON	42,811	513,738	12/15/1999	02/15/2024
313374-DK-9	FHLMC REMIC SER 1685 J (SEQ)			2	1	6,129,417	106,6350	7,804,266	7,318,706	6,940,745	221,495				6.000	7.833	MON	36,594	439,122	03/08/1996	02/15/2024
313374-V6-0	FHLMC REMIC SER 1709-Z			2	1	4,599,650	107,2150	5,654,830	5,274,275	4,751,121	53,095				6.500	8.767	MON	28,569	331,056	12/01/2009	03/15/2024
313375-MS-9	FHLMC REMIC SER 1731 H (SEQ)			2	1	3,393,197	105,6190	4,543,739	4,301,993	4,037,142	81,692				6.250	8.667	MON	22,406	268,875	05/01/1994	05/15/2024
313375-N7-4	FHLMC REMIC SER 1755 N (SEQ)			2	1	2,016,928	103,6790	2,854,778	2,753,486	2,556,268	135,347				6.000	9.994					

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
3133TG-E9-6	FHLMC REMIC SER 2086 GB (SEQ)			2	.1	1,406,228	.1068800	1,613,111	1,509,277	1,462,690	(3,272)		15,576		6.000	7.494	MON	7,546	90,557	08/21/2001	09/15/2028
3133TG-U4-9	FHLMC REMIC SER 2091 ZC (B-PAC-ACRL)			2	.1	2,413,869	.1072580	2,551,453	2,378,810	2,405,894					6.000	5.584	MON	11,894	142,729	12/18/2007	11/15/2028
3133TK-G7-9	FHLMC REMIC SER 2141 E (SEQ)			2	.1	793,393	.1080900	918,273	849,543	803,836					6.600	8.151	MON	4,672	56,070	07/30/1999	04/15/2029
3133TP-QH-2	FHLMC REMIC SER 2252 PE (B-PAC)			2	.1	1,053,463	.1090940	1,151,421	1,055,442	1,053,078			(72)		7.500	7.597	MON	6,597	79,158	10/31/2000	08/15/2030
3133TT-TT-8	FHLMC REMIC SER 2330 PZ (PAC-Z)			2	.1	10,492,620	.1070310	12,060,854	11,268,530	10,859,130			74,585		6.500	7.833	MON	61,038	732,454	06/19/2001	06/15/2031
3135BJ-BJ-9	FNMA REMIC SER 1991-119 Z (ACRL)			2	.1	733,705	.1098750	896,902	816,293	769,700			11,101		8.500	10.615	MON	5,782	69,385	09/01/1991	09/25/2021
3135BJ-KC-4	FNMA /GNMA SER G-27 JQ (B PAC)			2	.1	421,159	.1115000	478,012	428,710	424,537			66		8.500	8.792	MON	3,037	36,440	11/26/2001	07/25/2018
3135BP-HT-7	FNMA /GNMA SER G92-35 E (B PAC)			2	.1	807,621	.1107310	876,568	791,618	796,220			207		7.500	7.328	MON	4,948	59,371	08/03/1998	07/25/2022
3135BU-ZK-1	FNMA REMIC SER 1993 50-PZ (PAC Z)			2	.1	9,615,525	.1095780	11,173,529	10,196,864	9,864,799			20,420		7.000	8.011	MON	59,482	713,780	06/03/1993	05/25/2023
3135BU-7D-2	FNMA REMIC SER 1993 70 Z			2	.1	1,679,555	.1095920	2,029,607	1,851,963	1,766,268			14,173		6.900	8.640	MON	10,649	127,785	01/31/2000	05/25/2023
3135BU-MV-5	FNMA /GNMA SER 1993 15-H (B-PAC)			2	.1	2,952,953	.1085130	3,224,010	2,971,074	2,955,240			24		7.250	7.374	MON	17,950	215,403	04/28/1998	04/25/2023
31359A-2P-3	FNMA REMIC SER 1993 104-E (SEQ)			2	.1	953,733	.1089600	1,143,731	1,049,681	1,014,696			5,493		6.500	7.654	MON	5,686	68,229	07/01/1993	07/25/2023
31359A-KE-8	FNMA REMIC SER 1993-65 ZZ (ACRL)			2	.1	104,714	.1085780	113,985	104,980	104,884			7		7.000	6.775	MON	1,347		11/01/2008	06/25/2013
31359A-UG-2	FNMA REMIC SER 1993-96 PZ (PAC Z)			2	.1	910,454	.1097350	1,039,200	947,008	924,378			1,476		7.000	7.665	MON	5,524	66,290	10/24/2003	06/25/2023
31359B-P4-3	FNMA REMIC SER 1993 133-KZ (B-PAC)			2	.1	6,953,125	.1095780	7,855,699	7,169,041	7,044,552			19,303		7.000	7.561	MON	41,819	501,833	08/06/1993	08/25/2023
31359B-TX-5	FNMA REMIC SER 1993-127 H (BPAC)			2	.1	451,037	.1089300	536,134	492,180	469,950			1,041		6.500	7.901	MON	2,666	31,992	03/31/2000	07/25/2023
31359B-VY-0	FNMA REMIC SER 1993-130 H (B-PAC)			2	.1	3,928,948	.1095980	4,986,718	4,550,000	4,301,300			66,981		6.500	7.993	MON	24,646	295,750	02/28/2000	08/25/2023
31359D-3U-5	FNMA REMIC SER 1993-163 ZA			2	.1	1,110,511	.1064430	1,229,168	1,154,769	1,127,696			1,607		7.000	7.662	MON	5,736	80,833	04/27/2000	09/25/2023
31359D-JT-1	FNMA REMIC SER 1993-156 ZB (Z)			2	.1	5,706,924	.1097860	6,545,929	5,962,450	5,810,068			11,703		7.000	7.747	MON	34,781	417,372	06/08/1999	09/25/2023
31359D-YS-6	FNMA /GNMA SER 1993 31-PW (B-PAC1)			2	.1	10,253,125	.1109510	11,095,090	10,000,000	10,087,301			(23,268)		7.000	6.837	MON	58,333	700,000	09/01/1993	09/25/2023
31359D-Z4-8	FNMA REMIC SER 1993-187 LA (B-PAC)			2	.1	9,765,300	.1096650	10,966,520	10,000,000	9,877,372			21,359		6.500	6.759	MON	54,167	650,000	09/01/1993	09/25/2023
31359E-HA-2	FNMA REMIC SER 1993-183 KA (BPAC)			2	.1	9,772,518	.1095130	10,956,786	10,005,000	9,904,573			27,482		6.500	6.765	MON	54,194	650,325	03/07/1997	10/25/2023
31359F-TF-5	FNMA REMIC SER 1993-223 PZ (PAC Z)			2	.1	2,476,256	.1090030	2,882,442	2,644,374	2,556,183			27,799		6.500	7.558	MON	14,324	167,935	10/01/2009	12/25/2023
31359G-ER-3	FNMA REMIC SER 1993-225 OK (B-PAC)			2	.1	4,034,093	.1094960	5,558,012	5,076,000	4,631,635			133,062		6.500	8.779	MON	27,495	329,940	12/12/1997	12/25/2023
31359H-5D-2	FNMA REMIC SER 1994-93 PN (B-PAC)			2	.1	2,283,530	.1108750	2,617,759	2,361,000	2,316,539			6,470		8.000	8.417	MON	15,740	188,880	08/09/1994	02/25/2024
31359K-PQ-4	FNMA REMIC SER 1996-32 PJ (B-PAC)			2	.1	1,393,648	.1098980	1,560,850	1,420,278	1,405,539			1,420		7.000	7.275	MON	8,285	99,419	06/08/1999	08/25/2026
31359L-KA-2	FNMA REMIC /GNMA SER G94-13 ZA (Z.PAC)			2	.1	9,089,010	.1087190	11,439,563	10,522,157	9,765,602			94,000		7.000	9.645	MON	61,379	736,551	11/10/1994	11/17/2024
313602-E6-5	FNMA REMIC SER 1988 17-C (B.PAC)			2	.1	56,733	.1146820	64,430	56,181	56,138			(69)		10.000	9.994	MON	468	5,618	05/31/1989	03/25/2018
31364H-FQ-5	FNMA STRIP SER 56-1 (SEQ)			2	.1	2,279	.1100730	3,353	3,046	2,623			17		6.000	10.465	MON	15	183	09/22/1989	04/01/2019
31392E-3V-0	FNMA REMIC SER 2002-71 PZ (PAC-Z)			2	.1	21,967,947	.1024530	23,599,867	23,034,778	21,755,062			389,430		5.500	6.370	MON	105,576	1,229,963	12/01/2009	11/25/2032
31392F-3U-9	FNMA REMIC SER 2002-77 VA (VADM)			2	.1	9,716,978	.1019200	9,486,996	9,308,286	9,369,332			(117,438)		5.500	3.194	MON	42,663	511,956	11/19/2002	11/25/2010
31392K-LK-0	FHLMC REMIC SER 2450 PG (BPAC)			2	.1	9,995,824	.1080600	10,284,099	9,517,000	9,643,390			(122,719)		6.000	5.361	MON	47,585	571,020	09/20/2002	08/15/2014
31392W-JK-7	FHLMC REMIC SER 2509 TF (BPAC)			2	.1	2,341,922	.1051310	2,470,567	2,344,228	2,344,228			1,023		5.500	5.582	MON	10,771	129,250	10/15/2002	08/15/2031
31393A-CP-0	FNMA REMIC SER 2003-29 QD (BPAC)			2	.1	600,613	.1005220	579,186	576,177	575,533			(3,402)		5.000	4.059	MON	2,401	28,809	03/14/2003	05/25/2010
31393A-PB-7	FNMA REMIC SER 2003-22 KJ (SEQ-NAS)			2	.1	2,597,219	.1010490	2,514,024	2,487,935	2,493,547			(23,740)		5.500	3.534	MON	11,403	136,836	05/18/2004	07/25/2010
31393B-CB-9	FNMA REMIC SER 2003-36 TB (BPAC)			2	.1	15,200,000	.1014460	15,216,870	15,000,000	14,969,975			(85,218)		5.000	4.772	MON	62,500	750,000	04/04/2003	11/25/2010
31393B-N9-2	FNMA REMIC SER 2003-35 DZ (PAC Z)			2	.1	1,391,709	.1043980	1,505,108	1,441,709	1,405,869			9,554		5.500	5.965	MON	6,608	76,981	12/01/2009	05/25/2033
31393B-ZF-5	FNMA REMIC SER 2003-41 YT (BPAC)			2	.1	10,679,347	.1022570	10,768,952	10,531,251	10,515,304			(48,785)		5.000	4.765	MON	43,880	526,563	04/04/2003	01/25/2011
31393C-5M-1	FNMA REMIC SER 2003-66 MZ (PAC Z)			2	.1	1,919,079	.0965680	2,034,169	2,106,456	1,944,299			14,572		5.000	5.865	MON	8,777	102,525	12/01/2009	07/25/2023
31393C-AH-6	FNMA REMIC SER 2003-34 AV (VADM)			2	.1	9,949,221	.1066420	9,875,459	9,260,411	9,621,192			(81,472)		6.000	2.339	MON	46,302	555,625	04/17/2003	03/25/2013
31393C-JM-6	FNMA REMIC SER 2003-54 PD (PAC)			2	.1	951,734	.1006210	959,146	953,223	950,422			(191)		4.500	4.514	MON	3,575	42,895	09/15/2003	02/25/2028
31393D-VQ-1	FNMA REMIC SER 2003-61 MZ (PAC Z)			2	.1	8,893,524	.0974700	9,365,515	9,608,574	8,950,141			42,612		5.000	5.644	MON	40,036	467,666	12/01/2009	08/25/2033
31393E-2C-2	FNMA REMIC SER 2003-85 PZ (PACZ)			2	.1	7,282,511	.0976100	8,581,986	8,778,511	7,410,755			123,218		5.000	6.618	MON	36,577	427,266	12/01/2009	09/25/2033
31393E-6H-7	FNMA REMIC SER 2003-W14 1A8 (WH-SEQ)			2	.1	3,169,047	.1071560	3,396,895	3,170,337	3,164,775			(433)		5.858	5.884	MON	15,475	185,701	08/22/2003	09/25/2043
31393E-B2-4	FNMA REMIC SER 2003-93 MK (DUS 30/10/9.5)			1	.1	2,873,619	.1115010	2,967,641	2,661,528	2,794,270			(13,243)		7.500	6.398	MON	16,635	199,615	08/21/2003	11/25/2019
31393E-CB-3	FNMA REMIC SER 2003-74 PT (PAC)			2	.1	9,909,375	.1039220	10,392,230	10,000,000	9,954,233			13,513		5.000	5.143	MON	41,667	500,000	07/30/2003	02/25/2029

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	Code	Foreign	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
31393Q-DY-5	FHLMC REMIC SER 2615 PD (BPAC)			2	1	3,975,090	105.2930	4,068,525	3,864,000	3,903,817			(30,462)		5.500	5.157	MON	17,710	212,520	06/27/2003	02/15/2015
31393R-K7-4	FHLMC REMIC SER 2625 PX (PAC)			2	1	6,065,879	101.1110	5,992,098	5,926,287	5,927,864			(14,038)		4.000	3.558	MON	19,754	237,052	06/10/2003	10/15/2010
31393T-DM-5	FNMA REMIC SER 2003-89 DW (PAC)			2	1	24,889,063	103.8550	25,963,625	25,000,000	24,912,022			6,148		5.000	5.071	MON	104,167	1,250,000	08/15/2003	03/25/2029
31393T-S2-3	FNMA REMIC SER 2003-109 PZ (PAC Z)			2	1	718,200	104.0280	752,327	723,200	717,289			(17)		6.000	6.106	MON	3,616	42,014	12/01/2009	11/25/2033
31393W-6V-6	FHLMC REMIC SER 2640 BZ (PAC-Z)			2	1	20,395,015	97.5960	21,193,314	21,715,418	20,534,425			105,785		5.000	5.555	MON	90,481	1,056,928	12/01/2009	07/15/2033
31393W-AB-5	FHLMC REMIC SER 2640 ED (PAC)			2	1	1,672,027	101.5210	1,662,642	1,637,737	1,637,862			(3,271)		4.500	4.105	MON	5,142	73,698	07/08/2003	11/15/2010
31393W-BC-2	FHLMC REMIC SER 2640 OE (PAC)			2	1	15,872,933	104.3240	16,028,263	15,364,000	15,448,056			(96,660)		5.000	4.512	MON	64,017	768,200	06/26/2003	01/15/2012
31393W-BR-9	FHLMC REMIC SER 2640 PZ (PAC Z)			2	1	18,612,833	97.8420	20,489,324	20,941,343	18,861,950			202,311		5.000	6.037	MON	87,256	1,019,252	12/01/2009	07/15/2033
31393W-SV-2	FHLMC REMIC SER 2645 NZ (PAC Z)			2	1	2,552,204	100.9790	2,781,686	2,754,715	2,601,033			36,832		5.000	5.845	MON	11,478	134,077	12/01/2009	07/15/2033
31393W-WZ-8	FHLMC REMIC SER 2638 CZ (PAC-Z)			2	1	4,283,138	100.0310	4,446,124	4,444,733	4,309,375			16,491		5.000	5.384	MON	18,520	216,333	12/01/2009	07/15/2033
31393X-BJ-5	FNMA REMIC SER 2004-12 WZ (PAC-Z)			2	1	2,713,243	104.2170	2,955,238	2,835,661	2,710,319			6,964		6.000	6.387	MON	14,178	164,737	12/01/2009	03/25/2034
31393X-J4-0	FNMA REMIC SER 2004-27 NE (NAS)			2	1	1,876,517	101.1830	1,874,696	1,852,778	1,850,797			(5,528)		4.500	4.140	MON	5,948	83,375	04/13/2004	12/25/2010
31393X-V8-7	FNMA REMIC SER 2004-35 AZ (ACRL)			2	1	15,349,605	91.8410	17,769,116	19,347,695	15,796,487			381,020		4.500	6.478	MON	72,554	849,790	12/01/2009	05/25/2034
31394B-NS-9	FNMA REMIC SER 2004-87 UC (PAC)			2	1	3,431,358	103.3090	3,557,143	3,443,194	3,432,581			248		4.500	4.551	MON	12,912	154,944	11/12/2004	03/25/2029
31394B-SF-2	FNMA REMIC SER 2004-90 PC (PAC)			2	1	10,752,032	103.5810	10,937,149	10,559,000	10,562,449			(41,529)		5.000	4.631	MON	43,996	527,950	11/08/2004	06/25/2011
31394C-D3-3	FNMA 2005-28			2	1	13,202,833	104.4610	13,947,659	13,352,000	13,259,821			13,651		5.000	5.175	MON	55,633	667,600	04/05/2005	03/25/2031
31394C-X6-4	FNMA 2005-28 BC			2	1	12,164,564	104.5210	12,858,186	12,302,000	12,217,371			12,792		5.000	5.176	MON	51,258	615,100	04/05/2005	03/25/2031
31394D-J6-6	FNMA 2005-29 GC			2	1	23,431,160	104.4340	24,760,186	23,709,000	23,540,643			27,475		5.000	5.185	MON	98,788	1,185,450	04/05/2005	03/25/2031
31394G-HT-3	FHLMC REMIC SER 2649 OC (PAC)			2	1	7,027,344	104.5730	7,320,075	7,000,000	6,995,205			(7,020)		5.000	4.961	MON	29,167	350,000	07/24/2003	04/15/2012
31394G-KL-6	FHLMC REMIC SER 2649 VA (VADM)			2	1	11,099,802	106.5720	10,989,565	10,311,908	10,752,616			(5,785)		5.500	2.274	MON	47,263	567,155	07/03/2003	11/15/2013
31394H-R4-5	FHLMC REMIC SER 2663 ZP (PAC-Z)			2	1	1,138,345	97.7970	1,207,280	1,234,478	1,148,297			7,835		5.000	5.713	MON	5,144	60,084	12/01/2009	08/15/2033
31394J-F7-7	FHLMC REMIC SER 2683 NM (PAC)			2	1	2,724,857	100.2670	2,755,810	2,748,477	2,743,218			3,008		4.500	4.680	MON	10,307	123,681	11/10/2003	09/15/2026
31394J-UZ-8	FHLMC REMIC SER 2677 VC (RESEC - VADM)			2	1	7,379,139	106.5000	7,458,991	7,003,780	7,208,330			(14,574)		5.500	3.043	MON	32,101	385,208	09/23/2003	07/15/2013
31394K-CN-2	FHLMC REMIC SER 2690 TD (PAC)			2	1	8,537,011	101.9140	8,636,965	8,474,774	8,468,011			(6,659)		4.500	4.367	MON	31,780	381,365	10/08/2003	02/15/2011
31394K-CT-9	FHLMC REMIC SER 2690 TZ (PAC Z)			2	1	10,591,413	89.9700	11,868,354	13,191,413	10,727,334			69,457		4.500	6.105	MON	49,468	579,394	12/01/2009	10/15/2033
31394K-D3-5	FHLMC REMIC SER 2690 ZP (PAC Z)			2	1	8,071,927	97.4550	9,099,896	9,337,555	8,149,297			60,809		5.000	6.175	MON	38,906	454,475	12/01/2009	10/15/2033
31394K-N8-3	FHLMC REMIC SER 2686 KZ (ACRL)			2	1	1,242,973	86.6920	1,436,122	1,656,578	1,257,781			29,748		4.500	6.599	MON	6,212	72,760	12/01/2009	10/15/2033
31394K-PM-0	FHLMC REMIC SER 2686 VL (VADM)			2	1	2,780,221	106.7480	2,821,034	2,642,717	2,727,122			3,982		5.500	3.364	MON	12,112	145,349	10/31/2003	08/15/2014
31394L-EC-2	FHLMC REMIC SER 2691 MC (PAC)			2	1	3,819,258	101.9430	3,892,265	3,818,065	3,812,198			(736)		4.500	4.503	MON	14,318	171,813	10/15/2003	02/15/2011
31394L-LE-0	FHLMC REMIC SER 2694 PC (PAC)			2	1	3,476,798	100.9410	3,498,595	3,465,967	3,460,979			(2,612)		4.500	4.441	MON	12,997	155,969	11/26/2003	08/15/2010
31394M-3J-7	FHLMC REMIC SER 2705 PN (PAC)			2	1	608,808	100.2410	603,023	601,571	600,725			(1,466)		4.500	4.248	MON	2,256	27,071	03/03/2004	03/15/2010
31394M-C7-3	FHLMC REMIC SER 2702 AB (PAC)			2	1	327,982	102.5270	344,231	335,746	334,055			705		4.500	4.997	MON	1,259	15,109	06/15/2004	07/15/2027
31394M-KN-9	FHLMC REMIC SER 2714 LZ (PAC Z)			2	1	6,431,440	101.6030	6,986,955	6,876,721	6,508,648			85,754		5.500	6.234	MON	31,518	367,189	12/01/2009	12/15/2033
31394M-NH-9	FHLMC REMIC SER 2716 VZ (PAC Z)			2	1	6,119,170	98.7840	6,669,738	6,751,834	6,199,051			51,785		5.000	5.897	MON	28,133	328,624	12/01/2009	12/15/2033
31394M-U0-1	FHLMC REMIC SER 2723 PT (BPAC)			2	1	4,978,906	101.5770	5,078,870	5,000,000	4,989,753			4,255		4.500	4.587	MON	18,750	225,000	02/25/2004	08/15/2029
31394M-VN-7	FHLMC REMIC SER 2725 CB (SEQ)			2	1	9,176,667	102.2590	10,415,741	10,185,687	9,674,831			133,149		4.000	5.261	MON	33,952	407,427	12/29/2003	12/15/2018
31394N-KB-3	FHLMC REMIC SER 2742 LB (B-PAC)			2	1	3,838,725	102.7760	3,890,584	3,785,491	3,788,195			(9,908)		5.000	4.704	MON	15,773	189,275	05/04/2004	09/15/2011
31394R-VE-6	FHLMC REMIC SER 2758 ZC (PAC Z)			2	1	9,246,876	100.4480	9,639,870	9,596,876	9,273,864			32,652		5.500	5.867	MON	43,986	512,434	12/01/2009	03/15/2034
31394R-Y7-8	FHLMC REMIC SER 2761 QZ (PAC-Z)			2	1	1,214,035	104.7100	1,255,645	1,199,160	1,213,209			(1,346)		6.000	5.974	MON	5,996	69,665	12/01/2009	03/15/2034
31394R-YT-0	FHLMC REMIC SER 2769 BX (PAC)			2	1	4,979,703	102.8850	4,995,337	4,855,287	4,867,011			(13,030)		4.500	4.003	MON	18,207	218,488	10/31/2004	10/15/2011
31394T-K6-6	FHLMC REMIC SER 2760 PN (PAC)			2	1	6,130,690	103.0600	6,280,995	6,094,503	6,091,435			(4,491)		4.500	4.391	MON	22,854	274,253	04/02/2004	11/15/2011
31394T-C6-0	FHLMC REMIC SER 2759 BC			2	1	6,951,173	104.7460	7,265,210	6,936,000	6,929,789			(5,279)		5.000	4.981	MON	28,900	346,800	08/04/2004	01/15/2013
31394U-G2-2	FANNIE MAE SERIES 2005105 CLASS AJ			2	1	6,766,250	101.4620	6,826,745	6,728,403	6,729,618			(28,964)		5.000	4.196	MON	28,035	336,420	06/11/2008	10/25/2010
31394W-NL-8	FHLMC REMIC SER 2777 ZC (ACRL-SEQ)			2	1	13,255,258	89.9220	15,569,356	17,314,252	13,775,806			382,601		4.500	6.920	MON	64,928	760,477	12/01/2009	04/15/2034
31394W-Y9-3	FHLMC REMIC SER 2785 ZU (PAC Z - RESEC)			2	1	20,477,719	98.4240	21,415,938	21,758,969	20,626,083			106,490		5.500	5.555	MON	106,662	1,059,047	12/01/2009	03/15/2034
31394X-LR-5	FHLMC REMIC SER 2780 AC (SEQ)			2	1	2,879,799	101.5550	3,264,255	3,214,286	3,170,378			63,746		3.000	4.985	MON				



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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	N A I C D e s.	A c t u a l C o s t	R a t e U s e d t o O b t a i n F a i r V a l u e	F a i r V a l u e	P a r V a l u e	B o o k / A d j u s t e d C a r r y i n g V a l u e	U n r e a l i z e d V a l u a t i o n I n c r e a s e / ( D e c r e a s e )	C u r r e n t Y e a r ' s ( A m o r t i z a t i o n ) A c c r e t i o n	C u r r e n t Y e a r ' s O t h e r T h a n T e m p o r a r y I m p a i r m e n t R e c o g n i z e d	T o t a l F o r e i g n E x c h a n g e C h a n g e i n B o o k / A d j u s t e d C a r r y i n g V a l u e	R a t e o f	E f f e c t i v e R a t e o f	W h e n P a i d	A d m i t t e d A m o u n t D u e a n d A c c r u e d	A m o u n t R e c e i v e d D u r i n g Y e a r	A c q u i r e d	M a t u r i t y
31395H-WB-2	FHLMC			2	1	19,881,250	102.5850	20,517,040	20,000,000	19,914,878		9,951			5.000	5.104	MON	83,333	1,000,000	01/19/2005	02/15/2033
31395P-5J-7	FHLMC SERIES 2931 CLASS QB			2	1	10,094,467	103.5330	10,353,260	10,000,000	10,040,606	(47,507)			4.500	4.027	MON	37,500	450,000	12/22/2008	07/15/2012	
31395P-X6-4	FHLMC 2950 NC			2	1	11,871,563	104.6010	12,552,072	12,000,000	11,933,306	18,228			5.000	5.197	MON	50,000	600,000	04/05/2005	09/15/2030	
31395U-AG-6	FHLMC Series 2981 Class XB			2	1	6,808,928	104.1760	7,056,869	6,774,000	6,792,179	(4,835)			5.000	4.968	MON	28,225	338,700	05/13/2005	09/15/2016	
31395U-AH-4	FHLMC Series 2981 Class XC			2	1	27,251,333	103.5020	28,321,635	27,363,502	27,270,057	6,623			5.000	5.077	MON	114,015	1,368,175	05/13/2005	02/15/2023	
31395U-PZ-8	FHLMC 2982			2	1	973,791	100.6370	1,000,931	994,593	990,696	5,702			4.500	5.933	MON	3,730	44,757	07/25/2006	01/15/2025	
31395X-3Z-6	FREDDIE MAC			2	1	4,030,886	104.6580	4,233,200	4,044,790	4,033,274	1,056			5.500	5.647	MON	18,539	222,464	06/19/2007	04/15/2030	
31396G-CM-1	Freddie Mac			2	1	11,700,414	101.6450	11,695,558	11,506,246	11,574,934	(123,860)			5.500	3.232	MON	52,737	632,844	12/09/2008	09/15/2010	
31396K-PR-7	FANNIE MAE 2006-69 PB			2	1	5,723,428	105.0570	5,931,284	5,645,798	5,657,810	(24,112)			6.000	5.567	MON	28,229	338,748	12/04/2006	03/25/2013	
31396T-DV-2	FHR 3164 ME			2	1	10,100,000	106.4470	10,644,740	10,000,000	10,039,512	(40,392)			6.000	5.828	MON	50,000	600,000	10/03/2006	08/15/2013	
31396T-XH-1	FHR 3167 ME			2	1	4,330,570	103.1130	4,433,842	4,300,000	4,298,505	(19,137)			5.750	5.529	MON	20,604	247,250	01/10/2007	12/15/2010	
31396V-F5-2	FANNIE MAE SERIES 200745 CLASS PD			2	1	12,313,422	105.9970	12,931,573	12,200,000	12,240,310	(30,516)			6.000	5.735	MON	61,000	732,000	10/17/2007	07/25/2012	
31396V-F7-8	FANNIE MAE SERIES 200745 CLASS PG			2	1	369,817	105.8620	386,902	365,477	368,503	(668)			6.000	5.800	MON	1,827	21,929	01/30/2008	06/25/2016	
31396V-J3-3	FANNIE MAE SERIES 200745 CLASS PQ			2	1	7,480,473	104.0490	7,670,672	7,372,194	7,428,440	(27,770)			5.500	4.317	MON	33,789	405,471	05/29/2008	01/25/2012	
31396V-RU-4	FANNIE MAE SERIES 200736 CLASS PA			2	1	9,230,553	103.4100	9,419,868	9,109,216	9,161,859	(48,616)			5.500	4.207	MON	41,751	501,007	05/29/2008	07/25/2011	
31396W-E7-7	FANNIE MAE Series 2007-65 Class PA			2	1	2,634,611	105.3510	2,764,792	2,624,360	2,626,027	(3,482)			6.000	5.640	MON	13,122	157,462	06/20/2007	07/25/2012	
31396W-E9-3	FANNIE MAE SERIES 2007-65 CLASS PC			2	1	2,467,916	106.8310	2,654,743	2,485,000	2,470,239	1,279			6.000	6.130	MON	12,425	149,100	07/09/2007	07/25/2035	
31396W-GJ-9	FANNIE MAE SERIES 200755 CLASS PE			2	1	6,130,279	106.2470	6,486,385	6,105,000	6,113,087	(7,369)			6.000	5.904	MON	30,525	366,300	10/15/2007	06/25/2014	
31396W-V8-6	FANNIE MAE SERIES 200776 CLASS PC			2	1	10,159,375	105.9660	10,596,590	10,000,000	10,068,233	(63,121)			6.000	5.538	MON	50,000	600,000	11/30/2007	08/25/2012	
31396X-FW-9	FANNIE MAE SERIES 200777 CLASS PC			2	1	1,507,969	106.7940	1,601,907	1,500,000	1,504,001	(2,439)			6.000	5.894	MON	7,500	90,000	12/18/2007	06/25/2015	
31396X-GP-3	FANNIE MAE SERIES 2007-77 CLASS J			2	1	6,929,942	104.0730	7,069,211	6,792,544	6,871,388	(55,950)			5.500	3.317	MON	31,132	373,590	12/22/2008	06/25/2011	
31397A-3R-2	FHR 3199 CLASS DB			2	1	2,965,207	102.9570	3,023,147	2,936,328	2,955,408	(9,404)			4.500	3.724	MON	11,011	132,135	12/22/2008	04/15/2012	
31397A-FW-0	FHR 3199			2	1	12,542,573	103.3990	13,254,022	12,818,339	12,542,983	20,812			6.000	6.360	MON	64,092	744,677	12/01/2009	08/15/2036	
31397B-2S-9	FHR 3210 PC			2	1	58,099	101.0660	58,177	57,563	57,574	(286)			6.000	5.121	MON	288	3,454	01/10/2007	07/15/2010	
31397B-DM-0	FHR 3210 PC			2	1	16,090,000	106.4200	17,027,216	16,000,000	16,025,181	(30,646)			6.000	5.912	MON	80,000	960,000	09/06/2006	09/15/2013	
31397C-SW-0	Freddie Mac 3242 ND			2	1	6,591,622	105.8960	6,935,844	6,549,663	6,557,356	(17,460)			5.750	5.603	MON	31,384	376,606	01/10/2007	11/15/2011	
31397H-LD-8	FREDDIE MAC Series 3322 Class AB			2	1	3,449,999	102.1370	3,512,598	3,439,118	3,438,267	(6,394)			5.500	5.161	MON	15,763	189,152	05/03/2007	01/15/2011	
31397J-QV-9	Freddie Mac SERIES 3351 CLASS O			2	1	6,589,632	108.4160	6,909,886	6,811,877	6,974,992	267,657			0.000	13.791	MON			06/02/2008	12/15/2036	
31397L-3P-2	FANNIE MAE SERIES 200861 CLASS MA			2	1	6,283,567	105.9600	6,555,623	6,186,896	6,249,582	(25,349)			5.500	4.080	MON	28,357	340,279	07/07/2008	06/25/2012	
31398E-L2-8	FREDDIE MAC 3554			2	1	11,740,301	101.7380	11,921,971	11,718,329	11,733,820	(6,481)			3.400	3.140	MON	33,202	166,010	07/08/2009	03/15/2012	
31398F-XE-6	Fannie Mae			2	1	1,048,121	98.1390	1,017,174	1,036,461	1,048,016	(1,05)			4.500	4.383	MON	3,887	3,887	11/18/2009	02/01/2023	
38373Q-J7-7	GNMA REMIC SER 2003-56 DZ (PAC Z)			2	1	2,582,013	100.5680	2,616,213	2,601,450	2,580,923	1,213			5.500	5.608	MON	11,923	138,907	12/01/2009	06/16/2033	
38373S-LY-1	GNMA REMIC SER 2003-12 OZ (PAC - Z)			2	1	580,309	101.5130	580,822	572,168	577,642	(1,469)			5.250	5.146	MON	29,202	29,202	12/01/2009	02/20/2033	
38373Y-ML-5	GNMA REMIC 2002-86 PC			2	1	1,052,004	101.9170	1,061,063	1,041,105	1,043,244	(4,368)			5.250	4.605	MON	4,555	54,658	05/12/2005	07/20/2011	
38374Z-BE-6	GNMA REMIC SERIES 200854 CLASS DC			2	1	1,295,005	103.1980	1,345,670	1,303,970	1,297,430	1,689			4.500	4.891	MON	4,890	58,679	06/11/2008	01/16/2035	
38374C-GS-4	GNMA REMIC SER 2003-76 PZ (PAC Z)			2	1	7,085,350	105.2420	7,649,189	7,268,163	7,114,976	26,287			6.000	6.337	MON	36,341	422,241	12/01/2009	09/20/2033	
38374E-UE-5	GNMA REMIC SER 2003-98 ZK (PAC-Z)			2	1	874,234	104.8770	905,640	863,523	873,297	(1,203)			6.000	5.967	MON	4,318	50,166	12/01/2009	11/20/2033	
38374L-SH-0	Class WZ			2	1	5,250,006	99.7770	5,311,941	5,323,792	5,254,019	4,961			5.500	5.671	MON	24,401	284,269	12/01/2009	09/20/2035	
38374M-CH-0	GNMA Series 2005-83 Class Z			2	1	7,112,859	98.4960	7,873,218	7,993,472	7,192,428	81,434			5.000	6.038	MON	33,306	389,056	12/01/2009	10/16/2035	
38374N-WL-9	GNMA G2SF 5.5			2	1	6,308,370	100.7020	6,641,855	6,595,567	6,337,753	32,602			5.500	5.967	MON	30,230	352,176	12/01/2009	01/20/2036	
38375D-LM-8	GNMA REMIC SERIES 200858 CLASS PA			2	1	43,611,869	105.6550	44,018,254	41,662,136	43,396,535	(215,334)			5.500	2.654	MON	190,951	1,336,660	05/05/2009	11/16/2014	
38375J-GT-6	GNMA Series 2007-6 Class LA			2	1	2,179,723	100.7410	2,192,458	2,176,323	2,172,005	(4,962)			5.500	5.105	MON	9,975	119,698	05/15/2007	05/20/2010	
38376C-AH-2	GNMA 2009-83 MA			2	1	13,872,335	103.1950	13,752,521	13,326,771	13,818,698	(53,638)			4.500	1.768	MON	49,975	149,926	09/23/2009	03/20/2013	
3837HO-NF-6	GNMA REMIC SER 1996-5 Z			2	1	1,978,141	108.9700	2,376,454	2,180,831	2,057,047	(4,102)			7.000	8.545	MON	12,722	152,658	04/18/1996	05/16/2026	
3837HO-PH-0	GNMA REMIC SER 1996-8 Z			2	1	3,464,331	109.0520	4,219,886	3,869,605	3,620,591	(4,559)			7.000	8.749	MON	22,573	270,572	05/10/1996	05/16/2026	
3837HO-SH-7	GNMA REMIC SER 1996-13 D (SEQ)			2	1	857,408	104.1820	875,928	898,278	898,278				7.000	8.214	MON	5,464	65,873	07/17/1996	07/16/2026	
3837HO-WJ-8	GNMA REMIC SER 1996-19 ZA (ACRL)			2	1	4,541,612	107.7190	5,430,908	5,041,736	4,761,252	29,708										

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

**SCHEDULE D - PART 1**

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

1 CUSIP Identification	2 Description	3 Codes			6 NAIC Des.	7 Actual Cost	8 Fair Value		10 Par Value	11 Book/ Adjusted Carrying Value	12-15 Change in Book/Adjusted Carrying Value				16-20 Interest					21-22 Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22	
			F o r e i g n	B o n d C h a r			R a t e U s e d t o O b t a i n F a i r V a l u e	F a i r V a l u e			U n r e a l i z e d V a l u e I n c r e a s e/ (D e c r e a s e)	C u r r e n t Y e a r 's (A m o r t i z a t i o n A c c r e t i o n)	C u r r e n t Y e a r 's O t h e r T h a n T e m p o r a r y I m p a i r m e n t R e c o g n i z e d	T o t a l F o r e i g n E x c h a n g e i n B o o k/ A d j u s t e d C a r r y i n g V a l u e	R a t e o f	E f f e c t i v e R a t e o f	W h e n P a i d	A d m i t t e d A m o u n t D u e a n d A c c r u e d	A m o u n t R e c e i v e d D u r i n g Y e a r	A c q u i r e d	M a t u r i t y	
2799999. U.S. Special Revenues - Defined Multi-Class Residential Mortgage-Backed Securities						1,201,661,418	XXX	1,283,518,239	1,244,016,352	1,209,472,906						XXX	XXX	XXX	5,608,361	64,924,816	XXX	XXX
31358S-6S-5	FNMA REMIC SER 2001-M1 D (COMM-ACES)			2	1	15,523,275	108.8360	17,312,571	15,907,041	15,583,788			8,925			6.460	6.716	MON	85,633	1,027,595	07/19/2001	02/25/2031
31359K-QX-8	FNMA REMIC SER 1996-M4 C (COMM-ACES)			2	1	981,554	115.1410	1,058,707	919,488	973,074			(802)			7.750	6.872	MON	5,938	71,260	06/04/2004	05/17/2035
31359R-M7-4	FNMA REMIC SER 1998-M2 E (ACES-ADJ)			2	1	4,473,990	99.9480	4,528,281	4,530,623	4,486,649			2,457			6.409	6.576	MON	24,197	290,368	02/18/1998	11/17/2037
31359X-UW-7	FNMA REMIC SER 2000-M1 Z (ACES-ADJ)			2	1	19,127,837	106.2010	21,209,547	19,971,156	19,105,924			15,295			7.208	7.744	MON	119,966	1,448,502	04/12/2000	01/17/2040
37611C-AA-4	GNMA REMIC SERIES 200775 CLASS A			2	1	2,428,980	103.3030	2,446,517	2,368,292	2,416,052			(12,927)			4.747	2.866	MON	9,368	56,205	06/05/2009	04/16/2012
38373M-SH-9	GNMA REMIC 2009-7 Z			2	1	9,032,653	85.7840	7,748,607	9,032,653	9,032,653						5.905	5.959	MON	44,444	432,653	12/01/2009	12/16/2050
38373M-AK-6	GNMA REMIC SER 2001-16 Z (AFC-PZ)			2	1	14,502,421	107.1300	13,552,281	12,650,278	14,266,457			(65,854)			6.750	5.697	MON	71,158	852,842	02/01/2009	10/16/2040
38373M-AR-1	GNMA REMIC SER 2001-34 Z (PROJ Z-ADJ)			2	1	48,109,815	110.7860	50,548,950	45,627,561	48,050,366			(76,293)			7.021	6.642	MON	266,943	3,071,731	12/01/2009	03/16/2041
38373M-AX-8	GNMA REMIC 2001-44 Z (ADJ-ACRL/FHA INSD)			2	1	43,330,067	109.8610	48,359,018	44,018,447	43,273,218			3,201			6.877	7.107	MON	252,262	2,917,338	12/01/2009	07/16/2041
38373M-BE-9	GNMA REMIC SER 2001-58 Z (PROJ Z-ADJ)			2	1	16,157,628	104.3650	18,434,462	17,663,402	16,030,282			9,717			6.221	6.995	MON	91,569	1,061,326	12/01/2009	09/16/2041
38373M-FX-3	GNMA REMIC SER 2002-56 Z (ADJ-ACRL)			2	1	2,627,275	106.3620	2,741,344	2,577,364	2,627,991			9,818			6.553	6.486	MON	14,075	163,802	12/01/2009	06/16/2042
38373M-G4-6	GNMA REMIC SERIES 200734 CLASS A			2	1	1,063,831	102.6890	1,063,338	1,035,496	1,060,154			(3,677)			4.272	1.932	MON	3,686	7,373	10/07/2009	02/16/2012
38373M-L6-5	GNMA REMIC SER 2007-69 AB			2	1	4,581,376	100.4540	4,729,965	4,708,602	4,676,668			40,875			3.000	4.958	MON	11,772	141,258	10/26/2007	07/16/2023
38373M-LP-3	GNMA REMIC SER 2004-51 A			2	1	7,948,854	101.0100	8,137,838	8,056,484	8,039,078			46,172			4.145	5.240	MON	27,828	333,941	11/02/2007	02/16/2018
38373M-LQ-1	GNMA REMIC 2004-51 B			2	1	4,947,000	104.2040	5,053,913	4,850,000	4,903,546			(42,484)			4.982	4.065	MON	20,136	241,627	12/19/2008	01/16/2012
38373M-PT-1	GNMA REMIC SERIES 200529 CLASS A			2	1	894,035	103.0390	895,597	869,182	892,201			(1,835)			4.016	2.421	MON	2,909	5,818	10/07/2009	06/16/2013
38373M-Q2-9	GNMA REMIC 2008-8 A			2	1	5,236,168	101.9500	5,240,033	5,139,797	5,220,649			(9,344)			3.612	1.974	MON	15,471	46,412	09/04/2009	01/16/2012
38373M-SX-9	GNMA REMIC SERIES 20065 CLASS A			2	1	2,886,013	103.2320	2,890,976	2,800,468	2,879,244			(6,770)			4.241	2.417	MON	9,897	19,795	10/07/2009	03/16/2013
38373M-TL-4	GNMA REMIC Series 2006-8 Class B			2	1	635,695	104.5290	627,175	600,000	634,488			(1,207)			4.815	2.346	MON	2,408	2,408	11/24/2009	04/01/2013
38373M-V2-3	GNMA REMIC SERIES 200845 CLASS A			2	1	9,097,032	101.8040	9,305,607	9,140,736	9,110,350			12,097			3.576	3.790	MON	27,239	305,081	08/19/2009	12/16/2011
38373M-VU-1	GNMA REMIC 2006-39 A			2	1	2,757,027	102.4130	2,759,746	2,694,712	2,749,987			(7,040)			3.772	2.084	MON	8,470	25,411	09/16/2009	07/16/2012
38373T-Y5-8	GNMA REMIC SER 2002-9 Z (ACRL-ADJ)			2	1	16,255,719	108.6230	17,766,841	16,356,366	16,226,977			(2,870)			6.803	6.939	MON	8,727	1,072,782	12/01/2009	12/16/2041
38374B-JX-2	GNMA REMIC SER 2003-59 Z (PROJ-Z)			2	1	20,463,178	106.5550	19,361,277	18,170,270	20,676,370			24,817			6.186	5.572	MON	93,662	1,086,794	12/01/2009	06/16/2043
2999999. U.S. Special Revenues - Defined Multi-Class Commercial Mortgage-Backed Securities						253,061,423	XXX	265,772,591	249,688,418	252,916,166			(63,904)			XXX	XXX	XXX	1,301,758	14,681,602	XXX	XXX
3199999. Total - U.S. Special Revenues Bonds						1,951,623,506	XXX	2,110,788,149	2,092,744,008	2,020,557,375			10,226,953			XXX	XXX	XXX	11,524,369	101,377,507	XXX	XXX
00036A-AB-1	AARP DEBS (144A)				1FE	4,958,850	103.9720	5,198,595	5,000,000	4,963,220			679			7.500	7.570	MON	62,500	375,000	05/01/2001	05/01/2031
00077T-AB-0	ABN AMRO BK NV (NY) SUB DEP NOTE				1FE	37,432,809	77.7760	31,064,672	39,941,000	37,439,539			306			7.125	7.602	AO	600,779	2,845,796	09/26/2000	10/15/2093
00081T-AC-2	ACCO BRANDS CORP 144A			1	4FE	95,139	110.0000	104,500	95,000	95,123			(16)			10.625	10.568	MS	2,551		09/22/2009	09/15/2014
001031-AF-0	AEP INDUSTRIES			1	5FE	3,834,530	95.7500	3,710,313	3,875,000	3,837,066			7,106			7.875	8.153	MS	89,852	305,156	06/11/2008	03/15/2013
001192-AE-3	AGL CAPITAL CORP			2	2FE	13,333,305	103.5490	13,772,070	13,300,000	13,319,619			(3,359)			4.950	4.917	JJ	303,573	658,350	02/10/2005	01/15/2015
00209T-AA-3	AT&T BROADBAND CORP UNSEC'D NTS				2FE	12,951,240	115.2700	12,967,841	11,250,000	12,193,285			(262,828)			8.375	5.483	MS	277,422	942,188	12/12/2006	03/15/2013
002824-AT-7	ABBOTT LABORATORIES BASIC				1FE	8,041,546	110.2990	9,298,197	8,430,000	8,091,054			41,514			5.875	6.660	MON	63,284	495,263	10/21/2008	05/15/2016
002824-AU-4	ABBOTT LABORATORIES				1FE	47,340,500	104.5970	49,683,480	47,500,000	47,353,218			12,718			5.125	5.167	AO	608,594	1,406,528	02/27/2009	04/01/2019
00389C-AB-0	ACADEMICA CHARTER SCHOOL NOTES (TMU-144A)			2	4	5,365,000	93.0150	4,990,255	5,365,000	5,365,000						6.850	6.850	FA	138,834	367,503	04/15/2004	08/15/2012
00389C-AC-8	ACADEMICA CHARTER SCHOOL NOTES (TMU-144A)			1	4	8,462,300	68.2060	5,889,588	8,635,000	8,485,265			5,164			8.000	8.206	FA	260,969	690,800	04/15/2004	08/15/2024
00430X-AB-3	ACCELLENT INC			1	5FE	672,000	96.2500	770,000	800,000	704,222			17,105			10.500	14.064	JD	7,000	84,000	08/08/2006	12/01/2013
004403-AA-9	ACE CASH EXPRESS INC SERIES 144A			1	5FE	740,250	73.0000	1,200,850	1,645,000	761,592			27,946	781,331		10.250	9.335	AO	42,153	168,613	01/16/2007	10/01/2014
000000-00-0	AGUA CALIENTE BAND OF CAHUILLA Series B				2FE	2,251,000	92.6460	2,085,461	2,251,000	2,251,000						6.440	6.440	AO	36,241	144,964	05/31/2007	10/01/2016
00753*-AK-5	Advance Drainage System			2	2	7,500,000	104.5880	7,844,100	7,500,000	7,500,000						5.580	5.580	JD	4,650	453,375	05/12/2005	06/27/2015
00828B-AC-9	AFFINIA GROUP INC 144A			1	4FE	167,958	108.3750	184,238	170,000	168,037			79			10.750	11.000	FA	7,005		08/06/2009	08/15/2016
00854B-AE-9	AGUA CALIENTE BAND OF CAHUILLA Series 144A				2	3,619,000	92.6460	3,352,859	3,619,000	3,619,000						6.080	6.080	AO	55,009	220,035	11/01/2006	10/01/2016
00855L-AC-3	AGUA CALIENTE BAND OF 144A				2	3,600,000	92.8760	3,343,536	3,600,000	3,600,000												

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
017475-AC-8	ALLEGIANCE CORP NTS				2FE	10,506,387	.101.0600	9,494,540	9,395,000	10,337,323			(31,875)		7.000	6.040	AO	138,837	657,650	01/14/2004	10/15/2026
018581-A8-7	Alliance Data Systems Corp				2	13,500,000		14,197,680	13,500,000	13,500,000					6.140	6.140	MN	105,915	828,900	04/28/2006	05/15/2011
018772-AL-7	ALLIANCE ONE INTL INC 144A			1	4FE	731,510	.105.0000	787,500	750,000	732,644		1,134			10.000	10.468	JJ	37,292		10/09/2009	07/15/2015
018772-AN-3	ALLIANCE ONE INTL INC 144A			1	4FE	487,500	.105.0000	525,000	500,000	488,101		601			10.000	10.512	JJ	24,861		08/12/2009	07/15/2016
020002-AC-5	ALLSTATE CORP DEBS				1FE	905,130	.112.1950	1,121,952	1,000,000	969,692		7,266			7.500	8.532	JD	3,333	75,000	02/28/1995	06/15/2013
020039-AJ-2	ALLTEL CORP				2FE	2,100,000	.107.9760	3,239,292	3,000,000	2,127,244		13,978			6.800	9.958	MN	34,000	204,000	04/22/1999	05/01/2029
022249-AU-0	ALUMINUM CO OF AMERICA NOTES				1FE	14,919,968	.96.5680	14,533,424	15,050,000	14,941,629		2,988			6.750	6.820	JJ	468,431	1,015,875	10/02/2001	01/15/2028
02378J-AU-2	AMERICAN AIRLINES			2	5FE	644,412	.78.0000	1,005,282	1,288,824	772,153		117,622			7.379	36.326	MN	10,039	95,102	01/04/2006	05/23/2016
026609-AM-9	WYETH				1FE	448,152	.106.8260	427,305	400,000	410,089		(7,981)			6.950	4.763	MS	8,186	28,400	09/24/2004	03/15/2011
02916P-AB-9	American Railcar			1	5FE	1,734,856	.93.3750	1,820,813	1,950,000	1,767,097		27,763			7.500	10.151	MS	48,750	146,250	02/09/2009	03/01/2014
030096-AF-8	AMERICAN STORES CO BONDS				3FE	13,448,358	.91.2500	11,319,563	12,405,000	13,285,100		(28,574)			8.000	7.244	JD	82,700	992,400	12/18/2007	06/01/2026
031162-AN-0	AMGEN, INC. BASIC				1FE	3,892,727	.98.7500	4,073,438	4,125,000	4,027,330		87,440			0.125	2.347	FA	2,148	5,156	07/21/2008	02/01/2011
032166-AC-3	AMSOUTH BANK NA A1				2FE	10,000,000	.88.9280	8,892,790	10,000,000	10,000,000					4.850	4.850	AO	121,250	485,000	03/24/2003	04/01/2013
032511-AN-7	ANADARKO PETROLEUM CORP UNSEC'D DEBS				2FE	15,922,944	.103.2590	15,437,176	14,950,000	15,793,241		(21,537)			7.200	6.672	MS	316,940	1,076,400	01/30/2003	03/15/2029
032654-AE-5	ANALOG DEVICES				2FE	17,004,700	.104.3190	16,781,846	16,087,000	16,981,066		(23,634)			5.000	3.649	JJ	404,409		12/03/2009	07/01/2014
035229-BP-7	ANHEUSER-BUSCH CO UNSEC'D DEBS				2FE	3,425,253	.105.6760	3,244,262	3,070,000	3,376,808		(9,572)			6.750	5.841	JD	9,210	207,225	05/07/2004	12/15/2027
035229-CE-1	ANHEUSER-BUSCH CO NOTES				2FE	3,424,018	.110.5800	3,220,090	2,912,000	3,073,527		(68,062)			7.500	4.812	MS	64,307	218,400	06/17/2004	03/15/2012
035229-CH-4	ANHEUSER-BUSCH CO SR NTS				2FE	1,333,264	.105.4490	1,254,838	1,190,000	1,218,881		(21,479)			6.000	4.042	AO	15,073	71,400	02/18/2004	04/15/2011
035229-CM-3	ANHEUSER-BUSCH CO UNSEC'D SR DEBS				2FE	1,544,786	.102.7350	1,417,749	1,380,000	1,536,476		(1,651)			6.500	5.726	MN	89,700	89,700	02/24/2004	05/01/2042
035229-CR-2	ANHEUSER-BUSCH CO NTS				2FE	2,023,700	.101.3860	2,027,726	2,000,000	2,012,600		(2,161)			4.625	4.485	FA	38,542	92,500	03/26/2004	02/01/2015
035229-CW-1	ANHEUSER-BUSCH CO UNSEC'D NTS				2FE	11,384,020	.97.5570	11,706,780	12,000,000	11,516,500		39,477			5.000	5.567	MS	200,000	600,000	12/13/2006	03/01/2019
035229-CX-9	ANHEUSER-BUSCH CO NTS				2FE	4,966,250	.104.2900	5,214,500	5,000,000	4,988,977		4,462			4.700	4.803	AO	49,111	235,000	04/28/2004	04/15/2012
035229-CY-7	ANHEUSER-BUSCH COS INC BASIC				2FE	19,957,600	.105.4300	21,085,920	20,000,000	19,976,283		4,043			5.000	5.027	JJ	461,611	1,000,000	08/11/2004	01/15/2015
035229-DD-2	ANHEUSER-BUSCH CO BASIC				2FE	12,206,745	.101.3570	14,899,494	14,700,000	12,426,141		193,167			5.500	8.154	JJ	372,808	808,500	11/19/2008	01/15/2018
035290-AJ-4	ANIXTER INTERNATIONAL INC BASIC				3FE	3,136,852	.96.2500	4,177,250	4,340,000	3,367,639		230,430			1.000	9.421	FA	16,396	34,525	04/21/2009	02/15/2013
037411-AM-7	APACHE CORP DEBS				1FE	10,360,400	.124.9000	12,490,020	10,000,000	10,345,812		(1,816)			7.375	7.110	FA	278,611	737,500	02/25/1998	08/15/2047
037411-AN-5	APACHE CORP DEBS				1FE	9,687,450	.116.8300	11,682,990	10,000,000	9,804,826		16,895			7.000	7.322	FA	291,667	700,000	10/24/2000	02/01/2018
037411-AP-0	APACHE CORP SR NOTES				1FE	4,634,280	.119.3850	4,775,412	4,000,000	4,550,995		(42,618)			7.625	5.725	JJ	152,500	305,000	12/21/2007	07/01/2019
039483-AH-5	ARCHER DANIELS MIDLAND CO				1FE	8,223,636	.121.7650	8,054,755	6,615,000	8,202,300		(21,335)			8.375	4.478	AO	116,957		11/17/2009	04/15/2017
039483-AM-4	ARCHER DANIELS MIDLAND CO NTS				1FE	2,960,368	.117.3650	3,004,547	2,560,000	2,901,594		(10,860)			7.500	6.225	MS	56,533	192,000	08/22/2003	03/15/2027
039483-AG-5	ARCHER DANIELS MIDLAND CO UNSEC'D UNSUB DEBS				1FE	4,394,790	.103.4460	4,241,274	4,100,000	4,137,672		(41,480)			5.870	4.778	MN	30,752	240,670	11/12/2002	11/15/2010
039483-AT-9	ARCHER DANIELS MIDLAND CO NOTES				1FE	13,619,702	.100.5490	14,142,231	14,065,000	13,640,788		8,256			5.935	6.183	AO	208,689	834,758	06/27/2007	10/01/2032
039483-AW-2	ARCHER DANIELS MIDLAND CO BASIC				1FE	1,554,805	.104.7500	1,702,188	1,625,000	1,571,632		11,981			0.875	1.701	FA	5,372	14,000	05/07/2009	02/15/2014
039483-AY-8	ARCHER DANIELS MIDLAND CO BASIC				1FE	18,632,398	.106.5120	20,716,662	19,450,000	18,708,813		64,966			5.450	6.029	MS	312,118	1,060,025	11/05/2008	03/15/2018
040555-CD-4	AZ PUB SVC CO SR UNSEC'D NTS				2FE	16,587,175	.107.4880	16,660,687	15,500,000	15,804,650		(129,262)			6.500	5.523	MS	335,833	1,007,500	01/16/2003	03/01/2012
04775H-AH-0	ATLANTA GAS LIGHT MTN				1FE	9,962,500	.122.9130	12,291,280	10,000,000	9,974,613		1,273			9.100	9.137	FA	379,167	910,000	03/11/1991	02/01/2021
048825-BC-6	ATLANTIC RICHFIELD CO NTS				1FE	3,315,858	.114.1870	2,968,862	2,600,000	2,823,638		(92,706)			8.500	4.434	AO	55,250	221,000	02/04/2004	04/01/2012
049560-AA-3	ATMOS ENERGY DEB				2FE	9,911,500	.102.7660	10,276,560	10,000,000	9,927,001		1,920			6.750	6.820	JJ	311,250	675,000	07/22/1998	07/15/2028
049560-AF-2	ATMOS ENERGY BASIC				2FE	45,703,050	.104.7820	49,771,308	47,500,000	46,426,188		190,954			4.950	5.493	AO	496,375	2,351,250	03/29/2006	10/15/2014
051154-AA-0	AUGUSTA FUNDING LTD SEC'D GUAR (FSA-144A)			1	1FE	9,443,100	.130.5470	13,054,700	10,000,000	9,536,766		10,595			9.250	9.819	AO	95,278	971,250	06/28/1991	10/15/2026
051155-AA-7	AUGUSTA FUNDING LTD SEC'D GUAR (CAPMAC-144A)			1	1FE	9,481,900	.128.2500	12,825,000	10,000,000	9,547,953		7,790			8.400	8.885	AO	177,333	840,000	01/13/1995	04/15/2030
05348E-AD-1	AVALONBAY COMMUNITIES INC MTN				2FE	5,556,747	.104.0580	5,098,837	4,900,000	5,000,392		(100,157)			7.500	5.267	JD	16,333	367,500	08/18/2003	12/15/2010
054937-AC-1	BBT CORPORATION SUB NTS				1FE	1,822,733	.106.2100	1,759,906	1,657,000	1,622,014		(20,719)			6.500	5.094	FA	44,877	107,705	08/14/2002	08/01/2011
054937-AE-7	BBT CORPORATION NTS				1FE	3,237,098	.103.8620	3,375,512	3,250,000	3,242,581		1,033			5.200	5.245	JD	3,756	169,000	12/16/2003	12/23/2015
05523U-AA-8	BAE SYSTEMS HOLDINGS INC 144A				2FE	15,394,028	.106.2050	15,134,170	14,250,000	14,627,322		(179,694)			6.400	4.961	JD	40,533	912,000	05/05/2005	12/15/2011
05523U-AD-2	BAE Systems Holdings Series 144A				2FE	18,996,200	.103.0190	19,573,591	19,000,000	18,998,113		282			5.200	5.202	FA	373,244	988,000	07/20/2005	08/15/2015
05523U-AJ-9	BAE SYSTEMS HOLDINGS INC 144A				2FE	8,631,730	.107.5670	8,605,352	8,000,000	8,625,938		(5,782)			6.375	5.303	JD	42,500	94,020	12/14/2009	06/01/2019
055381-AO-0	BE AEROSPACE, INC BASIC																				

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
059438-AH-4	BANC ONE CORP NTS				1FE	5,652,763		113,4750	4,964,536	4,375,000		5,436,696	(38,081)		7.625	5.407	AO	70,425	333,594	06/05/2003	10/15/2026
059438-AK-7	BANC ONE CORP DEBS				1FE	9,864,700		120,9760	10,000,000	10,000,000		9,888,544	2,871		8.000	8.121	AO	137,778	800,000	04/24/1997	04/29/2027
060505-AD-6	BANK OF AMERICA CORP NOTES				1FE	4,263,490		100,7140	3,877,489	3,850,000		3,857,790	(62,306)		7.800	6.095	FA	113,447	300,300	01/15/2002	02/15/2010
064230-AA-6	BANCWEST CORPORATION SUB NTS				1FE	706,818		101,5750	609,449	600,000		617,746	(16,210)		8.300	5.332	JJ	22,963	49,800	09/11/2003	01/15/2011
068777-AC-7	Barry-Wehmiller Companies Inc				2	10,000,000		102,5080	10,250,800	10,000,000		10,000,000			5.640	5.640	AO	112,800	564,000	09/29/2005	10/19/2015
071813-AU-3	BAXTER INT'L INC BASIC				1FE	12,473,960		106,0120	13,781,612	13,000,000		12,693,267	50,143		4.625	5.147	MS	177,035	601,250	03/18/2005	03/15/2015
07385T-AJ-5	BEAR STEARNS CO INC NTS				1FE	398,684		110,0330	440,133	400,000		400,000	111		5.700	5.738	MN	2,913	22,800	10/30/2002	11/15/2014
073902-CE-6	BEAR STEARNS CO INC NTS				2FE	4,936,750		103,2500	5,162,490	5,000,000		4,991,448	9,996		4.500	4.715	AO	39,375	225,000	11/10/2003	10/28/2010
075811-AB-5	BECKMAN COULTER INC UNSEC'D SR NTS				2FE	3,373,080		107,6620	3,229,869	3,000,000		3,100,327	(50,011)		6.875	4.979	MN	26,354	206,250	10/27/2003	11/15/2011
075811-AE-9	BECKMAN COULTER INC				2FE	15,579,175		109,0250	16,626,282	15,250,000		15,553,802	(25,373)		6.000	5.565	JD	76,250	482,917	06/23/2009	06/01/2015
075811-AF-6	BECKMAN COULTER INC				2FE	13,258,879		113,3260	14,297,233	12,616,000		13,251,069	(7,810)		7.000	6.258	JD	73,593	466,091	10/21/2009	06/01/2019
078167-AZ-6	BELL TEL CO OF PA DEBS				1FE	1,909,563		110,2430	2,011,937	1,825,000		1,895,987	(1,365)		8.350	7.961	JD	5,773	152,388	01/15/1993	12/15/2030
078167-BA-0	BELL TEL CO OF PA DEBS				1FE	15,564,100		113,9900	17,092,485	15,000,000		15,488,442	(8,235)		8.750	8.418	FA	495,833	1,312,500	06/23/1994	08/15/2031
079857-AG-3	BELLSOUTH CORP NOTES				1FE	2,483,859		100,7980	2,116,752	2,100,000		2,107,716	(62,032)		7.750	4.675	FA	61,483	162,750	01/23/2003	02/15/2010
079867-AM-9	BELLSOUTH TELECOM INC DEBENTURE				1FE	5,890,079		105,9740	6,199,502	5,850,000		5,883,869	(1,270)		7.000	6.937	AO	102,375	409,500	11/08/2001	10/01/2025
079867-AP-2	BELLSOUTH TELECOM INC DEBS				1FE	44,428,800		98,0210	44,109,315	45,000,000		44,432,028	(13)		7.000	7.089	JD	262,500	3,150,000	04/17/1996	12/01/2095
079868-AA-3	BELLSOUTH TELECOM INC SER 1994A PTC Series 144A	1			1FE	8,771,900		123,2020	12,320,200	10,000,000		9,999,900	5		8.650	8.650	JJ	430,097	865,000	12/15/1994	01/02/2020
081437-AF-2	BEMIS CO INC				2FE	39,619,810		109,9450	40,679,465	37,000,000		39,560,916	(58,894)		6.800	5.837	FA	1,076,289		10/06/2009	08/01/2019
081437-AG-0	BEMIS CO INC				2FE	7,756,056		106,4390	7,982,888	7,500,000		7,506,952	(19,105)		5.650	4.872	FA	181,271		07/27/2009	08/01/2014
088638-AA-5	BGC Partners, L.P.				2	6,000,000		100,5240	6,031,440	6,000,000		6,000,000			5.190	5.190	AO	77,850	311,400	06/11/2008	04/01/2010
092113-AE-9	BLACK HILLS CORP NTS				2FE	16,175,083		104,5990	16,526,595	15,800,000		15,981,323	(47,840)		6.500	6.115	MN	131,228	1,027,000	06/29/2005	05/15/2013
092114-AA-5	BLACK HILLS POWER INC 1ST MTG SER AE				1FE	10,000,000		108,6890	10,888,900	10,000,000		10,000,000			7.230	7.230	FA	273,133	723,000	08/08/2002	08/15/2032
09348T-AF-5	Blaze Recycling and Metals Al				4FE	338,750		67,7500	338,750	500,000		338,829	79	161,250	13.000	7.458	JJ	29,972		07/29/2009	07/16/2012
097014-AD-6	BOEING CO UNSEC'D SR NTS				1FE	2,207,360		105,7030	2,114,060	2,000,000		2,038,418	(31,552)		6.100	4.386	MS	40,667	122,000	01/15/2004	03/01/2011
097014-AK-0	BOEING CO				1FE	9,978,000		99,2600	9,925,980	10,000,000		9,978,740	740		3.250	3.298	AO	57,778		10/22/2009	10/27/2014
097023-AE-5	BOEING CO DEBS				1FE	7,885,264		131,0440	8,032,991	6,130,000		7,728,288	(32,966)		8.750	6.493	MS	157,933	536,375	06/25/2004	09/15/2031
097023-AK-1	BOEING CO DEBS				1FE	12,690,335		125,6560	14,450,440	11,500,000		12,636,699	(10,011)		7.875	7.084	AO	191,188	905,625	02/28/2003	04/15/2043
097023-AM-7	BOEING CO DEBS				1FE	393,980		113,9260	455,705	400,000		395,395	156		7.250	7.376	JD	1,289	29,200	03/06/1997	06/15/2025
097023-AN-5	BOEING CO DEBS				1FE	21,368,496		111,4890	25,787,475	23,130,000		21,455,819	8,853		6.875	7.455	AO	335,706	1,590,188	01/06/2003	10/15/2043
097023-AV-7	BOEING CO				1FE	4,977,900		107,6550	5,382,745	5,000,000		4,981,106	3,206		5.000	5.101	MS	73,611	126,389	03/10/2009	03/15/2014
097023-AW-5	BOEING CO				1FE	12,433,596		108,5160	12,153,837	11,200,000		12,405,600	(27,996)		6.000	4.554	MS	197,867	157,733	10/09/2009	03/15/2019
099599-AJ-1	BORDEN INC BONDS				6FE	750,000		73,0000	5,475,000	7,500,000		759,223	25,539	3,956,264	7.875	13.327	FA	223,125	590,625	04/22/1993	02/15/2023
10138M-AB-1	BOTTTLING GROUP LLC CO GTY				1FE	7,678,763		107,1980	8,307,837	7,750,000		7,701,256	15,443		4.625	4.862	MN	45,800	358,438	10/09/2008	11/15/2012
10138M-AD-7	BOTTTLING GROUP LLC UNSEC'D SR NTS SER B				1FE	6,940,119		103,4180	7,828,750	7,570,000		7,133,773	67,230		4.125	5.358	JD	13,878	312,263	12/14/2006	06/15/2015
10138M-AG-0	BOTTTLING GROUP LLC BASIC				1FE	4,927,750		108,1840	5,409,220	5,000,000		4,937,756	8,104		5.500	5.740	AO	68,750	275,000	10/01/2008	04/01/2016
110122-AA-6	BRISTOL MYERS SQUIBB CO DEBS				1FE	15,037,600		118,7940	17,819,115	15,000,000		15,024,229	(1,298)		7.150	7.130	JD	47,667	1,072,500	03/04/1994	06/15/2023
111384-AC-7	BROADVIEW NETWORKS HOLDING				5FE	1,461,681		95,7500	1,369,225	1,430,000		1,445,377	(8,167)		11.375	10.648	MS	54,221	162,663	11/14/2007	09/01/2011
113804-AA-6	BROOKLYN NAVY YARD COGEN 144A	2			3FE	6,257,873		82,3390	5,221,466	6,341,425		6,281,555	3,389		7.420	7.548	AO	117,634	470,534	07/07/2000	10/01/2020
115885-AK-1	BROWNING FERRIS DEBS				2FE	9,146,610		110,3390	9,930,474	9,000,000		9,134,165	(1,755)		7.400	7.271	MS	196,100	666,000	12/02/1998	09/15/2035
117043-AE-9	BRUNSWICK CORP DEB				5FE	4,689,150		67,0000	3,350,000	5,000,000		4,768,208	9,155		7.375	7.937	MS	122,917	368,750	08/23/1996	09/01/2023
117043-AG-4	BRUNSWICK CORP NOTES				5FE	16,933,078		70,0000	11,882,500	16,975,000		16,939,308	987		7.125	7.146	FA	503,945	1,209,469	12/18/2007	08/01/2027
118818-AA-0	BUFFALO THUNDER Series 144A	1			6*	71,100		17,5000	207,375	1,185,000		79,525	17,460	749,368	9.375	17.236	JD			05/18/2007	12/15/2014
120568-AC-4	BUNGE LTD FINANCE CORP UNSEC'D SR NTS				2FE	4,389,160		109,2720	4,370,876	4,000,000		4,185,424	(59,534)		7.800	5.968	AO	65,867	312,000	04/18/2006	10/15/2012
120568-AM-2	BUNGE LTD FINANCE CORP				2FE	29,277,609		102,2270	29,656,053	29,010,000		29,126,092	(24,154)		5.350	5.243	AO	327,652	1,552,035	12/18/2007	04/15/2014
120568-AC-3	BUNGE LTD FINANCE CORP				2FE	13,983,145		99,1450	13,880,328	14,000,000		13,999,743	1,565		5.100	5.115	JJ	329,233	714,000	12/12/2005	07/15/2015
120568-AT-7	BUNGE LTD FINANCE CORP				2FE	3,999,880		113,9910	4,559,628	4,000,000		3,999,998	118		8.500	8.500	JD	15,111	175,667	06/04/2009	06/15/2019
121897-WQ-1	BURLINGTON NORTHN INC SR NOTES				2FE	11,397,910		128,4910	12,849,120	10,000,000		11,061,187	(57,425)		8.750	7.367	FA	306,250	875,000	11/20/2002	02/25/2022
121899-CE-6	BURLINGTON NORTHN CONS. MORTGAGE BONDS				2FE	2,355,328		96,3120	3,196,582	3,319											

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
122014-AH-6	BURLINGTON RESOURCES DEBS				1FE	995,190		1,232,334	1,000,000	996,310		119			8.200	8.243	MS	24,144	82,000	03/21/1995	03/15/2025
124857-AA-1	CBS Corp				2FE	8,350,370		107,4850	7,000,000	7,843,486		(115,878)			7.625	5.269	JJ	246,118	533,750	03/01/2005	01/15/2016
12502C-AS-0	COH II LLC/CCH II CAP CP			1	4FE	1,512,800		1,177,500	891,458	1,495,972		(16,828)			13.500	(5.269)	FA	10,363		12/01/2009	11/30/2012
125152-AC-2	CE GENERATION LLC				3FE	84,438		96,1730	84,863	84,528		25			7.416	7.477	JD	280	6,293	07/19/2006	12/15/2018
125581-FT-0	CIT GROUP INC			1	6Z	1,769,027		93,2500	1,846,828	1,980,513		1,772,032			7.000	10.951	JAJO	8,087		12/10/2009	05/01/2013
125581-FU-7	CIT GROUP INC				6Z	2,610,742		92,8750	2,759,103	2,970,770		2,614,486			7.000	10.618	JAJO	12,131		12/10/2009	05/01/2014
125581-FV-5	CIT GROUP INC				6Z	2,518,010		89,5000	2,658,839	2,970,770		2,521,670			7.000	10.909	FMAN	12,131		12/10/2009	05/01/2015
125581-FW-3	CIT GROUP INC				6Z	4,065,910		88,0000	4,357,130	4,951,284		4,071,564			7.000	11.074	FMAN	20,218		12/10/2009	05/01/2016
125581-FX-1	CIT GROUP INC				6Z	5,559,121		86,7500	6,013,335	6,931,798		5,566,641			7.000	11.092	MJSD	28,305		12/10/2009	05/01/2017
125896-AI-0	CMS ENERGY HLDG CO			1	3FE	3,844,496		122,7500	4,787,250	3,900,000		3,803,285			2.875	2.232	JD	9,344	112,125	04/07/2009	12/07/2011
125896-BD-1	CMS ENERGY HLDG CO				3FE	735,313		122,2500	886,313	725,000		735,268			5.500	5.377	JD	1,772	19,938	11/05/2009	06/15/2029
125899-AF-6	PANHANDLE EASTERN SR NTS				2FE	4,951,700		100,6230	5,031,145	5,000,000		4,959,475			7.000	7.077	JJ	161,389	350,000	09/03/1999	07/15/2029
12616F-AA-5	CPG PARTNERS LP UNSEC'D NTS				1FE	11,764,800		104,6090	10,460,860	10,000,000		10,303,547			8.250	5.329	FA	343,750	825,000	10/09/2003	02/01/2011
12620X-AA-0	CPM HOLDINGS INC 144A			1	4FE	294,303		105,5000	316,500	300,000		294,973			10.625	11.093	MS	11,776		08/11/2009	09/01/2014
12626P-AE-3	CRH AMERICA INC NOTES				2FE	15,338,000		104,2180	15,632,700	15,000,000		15,152,277			5.300	5.001	AO	167,833	795,000	02/27/2004	10/15/2013
12626P-AF-0	CRH AMERICA INC BONDS				2FE	2,985,960		98,3100	2,949,303	3,000,000		2,987,288			6.400	6.435	AO	40,533	192,000	09/22/2003	10/15/2033
126408-BL-6	CSX CORP DEBS				2FE	1,588,617		115,8380	1,595,091	1,377,000		1,491,921			7.900	6.453	MN	18,131	108,783	02/01/1999	05/01/2017
126408-GH-0	CSX CORP				2FE	10,066,450		98,8080	9,880,810	10,000,000		10,064,846			6.000	5.951	AO	150,000	600,000	02/08/2007	10/01/2036
126408-GJ-6	CSX CORP				2FE	4,990,850		103,7390	5,186,965	5,000,000		4,992,880			5.600	5.624	MN	46,667	280,000	04/20/2007	05/01/2017
126410-LK-3	CSX Transportation Inc				2FE	2,346,794		131,1350	2,478,459	1,890,000		2,243,736			9.750	7.170	JD	8,190	184,275	08/24/2004	06/15/2020
126410-LL-1	CSX Transportation Inc BASIC				2FE	14,043,999		112,7760	15,630,740	13,860,000		14,036,448			7.875	7.768	MN	139,466	1,091,475	08/24/2004	05/15/2043
12641L-BD-4	CSX CORP MTN				2FE	10,000,000		128,0960	12,809,620	10,000,000		10,000,000			9.870	9.870	FA	372,867	987,000	02/12/1991	02/12/2021
126650-AF-7	CVS CORP PTC 144A			2	2FE	3,095,608		109,0510	2,784,027	2,552,952		2,716,589			7.770	4.124	MON	11,571	198,364	06/26/2003	01/10/2012
126650-AL-4	CVS CORP PTC 144A			2	2FE	4,813,083		106,7630	5,138,592	4,813,083		4,813,083			6.117	6.195	MON	17,174	294,416	12/03/2002	01/10/2013
126650-AI-0	CVS CORP 144A			2	2FE	15,938,487		91,4050	14,722,032	16,106,389		15,954,335			5.298	5.499	MON	49,777	853,317	10/17/2005	01/11/2027
126650-AJ-6	CVS CORP Series 144 A				2	13,331,065		90,7020	12,091,542	13,331,065		13,331,065			5.361	5.361	MON	41,690	714,678	05/16/2005	10/10/2027
126650-BH-2	CVS CORP BASIC				2FE	4,947,550		105,5410	5,277,070	5,000,000		4,958,453			5.750	5.890	JD	23,958	287,500	05/22/2007	06/01/2017
126650-BJ-8	CVS CORP BASIC				2FE	14,569,950		101,6950	15,254,250	15,000,000		14,600,296			6.250	6.508	JD	78,125	937,500	06/19/2007	06/01/2027
12681F-AA-5	Cabela's Incorporated Senior Unsecured				2	15,000,000		103,9020	15,585,300	15,000,000		15,000,000			5.990	5.990	FA	309,483	898,500	12/21/2005	02/27/2016
12681F-AC-1	Cabela's Incorporated				2	10,000,000		109,7010	10,970,100	10,000,000		10,000,000			7.200	7.200	JJ	330,000	720,000	12/21/2007	01/14/2018
127055-AG-6	CABOT CORP				2FE	24,475,730		98,0710	24,027,273	24,500,000		24,476,653			5.000	5.017	AO	330,069		09/25/2009	10/01/2016
127391-AA-8	CADETS TRUST Series 144A				1	14,951,700		95,7990	14,369,865	15,000,000		14,980,237			4.800	4.841	JJ	332,000	720,000	07/09/2003	07/15/2013
129466-AM-0	CALENERGY CO. INC SR NOTES				2FE	5,000,000		122,5860	6,129,280	5,000,000		5,000,000			8.480	8.480	MS	124,844	424,000	09/17/1998	09/15/2028
131347-BP-0	CALPINE CORP 144A			1	4FE	1,621,651		96,0000	1,987,200	2,070,000		1,628,676			7.250	11.456	AO	29,181		10/21/2009	10/15/2017
134011-AA-3	CAMP PENDLTON/QUANTICO NTS SER 2003 A-1 (144A-MBIA)			2	2FE	9,930,000		81,3980	8,082,821	9,930,000		9,930,000			5.937	5.937	AO	147,386	589,544	09/29/2003	10/01/2043
134429-AG-4	CAMPBELL SOUP CO DEBS				1FE	12,962,145		130,2280	14,976,197	11,500,000		12,570,048			8.875	7.622	MN	170,104	1,020,625	03/27/2002	05/01/2021
134429-AM-1	CAMPBELL SOUP CO NTS				1FE	28,155,800		106,3990	26,599,625	25,000,000		25,601,596			6.750	4.525	FA	637,500	1,687,500	08/05/2004	02/15/2011
134429-AR-0	CAMPBELL SOUP CO UNSEC'D NTS				1FE	8,736,437		107,9990	9,120,499	8,445,000		8,555,167			5.000	4.518	JD	32,842	422,250	02/23/2004	12/03/2012
14149Y-AF-5	CARDINAL HEALTH INC SR UNSEC'D NTS				2FE	26,658,148		104,4490	25,166,914	24,095,000		24,573,120			6.750	4.909	FA	614,423	1,626,413	03/02/2005	02/15/2011
14149Y-AG-3	CARDINAL HEALTH INC BASIC				2FE	9,024,050		98,1140	9,811,390	10,000,000		9,426,459			4.000	5.222	JD	17,778	400,000	02/07/2005	06/15/2015
141781-AC-8	CARGILL INC 144A				1FE	8,808,384		113,3880	9,547,295	8,420,000		8,715,535			7.375	7.003	AO	155,244	620,975	03/07/1996	10/01/2025
141781-AD-6	CARGILL INC 144A DEBS				1FE	6,965,789		109,0760	7,853,494	7,200,000		6,987,767			6.875	7.123	FA	206,250	495,000	07/06/2000	02/01/2036
141781-AE-4	CARGILL INC 144A SR NOTES				1FE	10,499,691		112,1440	10,081,782	8,990,000		10,248,193			7.500	6.146	MS	224,750	674,250	11/19/2002	09/01/2026
141781-AU-8	CARGILL INC Series 144A				1FE	9,775,850		99,4040	9,940,370	10,000,000		9,784,066			6.125	6.293	MS	180,347	612,500	07/17/2007	09/15/2036
141781-AV-6	CARGILL INC BASIC 144A			1	1FE	19,993,800		107,5670	21,513,360	20,000,000		19,996,546			5.600	5.607	MS	329,778	1,120,000	09/06/2007	09/15/2012
141781-F8-8	CARGILL INC				1	5,000,000		129,7850	6,489,250	5,000,000		5,000,000			8.890	8.890	MS	112,360	444,500	03/26/1992	03/31/2022
141781-G4-9	CARGILL INC SENIOR NOTES				1FE	5,000,000		131,0640	6,553,200	5,000,000		5,000,000			8.930	8.930	JD	27,286	446,500	11/18/1994	12/09/2024
141784-AR-9	CARGILL INC MTN 144A				1FE	4,600,650		107,9760	5,398,775	5,000,000		4,666,163			7.100	7.805	MN	45,361	355,000	08/05/1999	07/29/2027
141784-BH-0	CARGILL INC MTN 144A				1FE	1,607,857		105,7370	1,623,956	1,725,000		1,624,557			6.875	7.463	MN	19,766	118,594	06/25/2001	05

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
156431-AE-8	CENTURY ALUMINUM COMPANY BASIC				6FE	806,605	95.6250	1,434,375	1,500,000	832,423					1.750	6.468	FA	10,938	22,313	09/14/2009	08/01/2024
156700-AA-4	CENTURYTEL INC SR NTS SER H				2FE	26,602,836	104.9960	23,770,981	22,640,000	23,184,493	(663,760)				8.375	5.205	AO	400,288	1,896,100	11/17/2004	10/15/2010
159864-AB-3	CHARLES RIVER LABORATORI				3FE	575,925	97.2500	607,813	625,000	580,573					2.250	4.491	JD	625	4,781	12/17/2009	06/15/2013
165069-AP-0	CHES & POTOMAC TEL CO MD DEBS				1FE	853,200	105.1900	830,998	790,000	841,836					8.000	7.365	AO	13,342	63,200	01/15/1993	10/15/2029
165069-AS-4	CHES & POTOMAC TEL CO MD DEBS				1FE	9,746,300	101.7470	10,174,670	10,000,000	9,823,563					7.150	7.360	MN	119,167	715,000	06/22/1993	05/01/2023
165167-BZ-9	CHESAPEAKE ENERGY CORP BASIC				3FE	994,464	89.5000	1,521,500	1,700,000	1,007,455					2.500	5.352	MN	5,431	42,500	10/24/2008	05/15/2037
165167-CD-7	CHESAPEAKE ENERGY CORP				3FE	475,355	109.7500	548,750	500,000	478,220					9.500	10.625	FA	17,944	25,465	01/28/2009	02/15/2015
171265-AC-5	CHUGACH ELECTRIC ASSN SEC'D NOTE SER A (MBIA)				1FE	520,405	105.3120	526,559	500,000	503,368					6.550	5.960	MS	9,643	32,750	02/15/2002	03/15/2011
171870-AD-3	CINCINNATI BELL TEL CO MTN				3FE	6,499,950	76.7500	5,756,250	7,500,000	6,750,693					7.180	8.410	JD	23,933	538,500	08/22/1994	12/14/2023
172070-CP-7	CINCINNATI GAS & ELEC NTS				2FE	2,992,920	92.6040	2,778,108	3,000,000	2,993,662					5.400	5.416	JD	7,200	162,000	06/12/2003	06/15/2033
17252M-AG-5	CINTAS CORPORATION NO. 2 BASIC				1FE	10,626,200	94.2660	9,426,560	10,000,000	10,599,790					6.150	5.709	FA	232,333	615,000	12/06/2006	08/15/2036
172967-AL-5	CITIGROUP INC NOTES				1FE	4,524,000	105.1700	4,206,808	4,000,000	4,489,107					7.875	6.597	MN	40,250	315,000	12/18/2007	05/15/2025
177342-AP-7	CITIZENS UTILITY CO DEBS				3FE	28,949,390	77.2500	23,947,500	31,000,000	29,032,833					7.050	7.563	AO	546,375	2,185,500	03/25/1997	10/01/2046
185896-BF-3	CLEVELND CLIFS PRIVATE PLACEMENT				2	10,000,000	109.5520	10,955,200	10,000,000	10,000,000					6.310	6.311	JD	28,044	631,000	06/06/2008	06/25/2013
185896-C*-6	CLEVELND CLIFS PRIVATE PLACEMENT				2	10,000,000	109.8530	10,985,300	10,000,000	10,000,000					6.590	6.591	JD	29,289	659,000	06/06/2008	06/25/2015
191098-AH-5	COCA-COLA BOTTLING CO CONSOL				2FE	18,569,408	99.2540	19,553,038	19,700,000	18,768,980					5.000	5.884	JD	43,778	985,000	08/11/2008	06/15/2016
191216-AF-7	COCA-COLA CO DEBS				1FE	29,370,403	114.4390	35,361,775	30,900,000	29,374,007					7.375	7.758	JJ	962,192	2,278,875	12/28/1995	07/29/2093
191219-AN-4	COCA-COLA ENTERPRISES DEB				1FE	1,579,691	112.5770	1,576,077	1,400,000	1,449,795					8.500	6.632	FA	49,583	119,000	11/13/2003	02/01/2012
191219-AP-9	COCA-COLA ENTERPRISES DEBS				1FE	16,855,782	128.3620	19,626,489	15,290,000	16,476,581					8.500	7.472	FA	541,521	1,299,650	03/09/2004	02/01/2022
191219-AU-8	COCA-COLA ENTERPRISES DEBS				1FE	8,560,372	109.9770	8,666,164	7,880,000	8,425,603					6.750	6.002	MS	156,615	531,900	06/02/2004	09/15/2023
191219-AX-2	COCA-COLA ENTERPRISES BASIC				1FE	21,923,132	113.9380	23,243,291	20,400,000	21,865,092					6.700	6.149	AO	288,547	1,366,800	08/29/2007	10/15/2036
191219-AY-0	COCA-COLA ENTERPRISES NTS				1FE	7,080,741	112.7180	7,180,137	6,370,000	7,008,698					6.950	5.997	MN	56,569	442,715	12/18/2007	11/15/2026
191219-BC-7	COCA-COLA ENTERPRISES DEB				1FE	12,904,553	115.5380	14,442,213	12,500,000	12,905,588					6.750	6.480	JJ	389,063	843,750	04/10/2007	01/15/2038
191219-BE-3	COCA-COLA ENTERPRISES UNSEC'D DEBS				1FE	4,980,449	112.3380	5,279,891	4,700,000	4,947,464					6.750	6.268	MS	93,413	317,250	05/07/2004	09/15/2028
195891-AF-3	COLONIAL REALTY LP NTS				3FE	576,388	97.4050	562,024	577,000	576,876					4.800	4.818	AO	6,924	27,696	03/30/2004	04/01/2011
196816-AA-0	COLOIWOY COAL FNDG CORP COLL BONDS 144A				3FE	10,000,000	80.0000	8,000,000	10,000,000	10,000,000					10.190	10.191	MN	130,206	1,019,000	12/06/1994	11/15/2016
20029P-AG-4	COMCAST CABLE CORP NTS				2FE	15,506,480	119.8120	14,377,392	12,000,000	14,443,648					8.875	5.466	MN	177,500	1,065,000	08/12/2005	05/01/2017
200300-AN-1	COMCAST CORP SR SUB DEBS				2FE	277,188	117.9920	294,980	250,000	257,416					10.625	9.286	JJ	12,248	26,563	01/21/1997	07/15/2012
200300-AA-9	COMCAST CORP UNSEC'D SR NTS				2FE	6,970,795	100.1110	6,507,222	6,500,000	6,503,813					5.850	4.275	JJ	175,338	380,250	11/05/2004	01/15/2010
200300-AB-7	COMCAST CORP BASIC				2FE	3,115,320	112.0350	3,361,062	3,000,000	3,073,001					6.500	5.934	JJ	89,917	195,000	03/03/2006	01/15/2015
200300-AG-6	COMCAST CORP				2FE	7,446,725	102.6980	7,702,328	7,500,000	7,465,385					4.950	5.035	JD	16,500	371,250	06/28/2005	06/15/2016
200300-AZ-4	COMCAST CORP				2FE	8,978,670	104.9040	9,441,396	9,000,000	8,979,792					5.700	5.731	JJ	275,025	1,065,000	06/15/2009	07/01/2019
200339-AE-9	COMERICA BANK SUB NOTES				1FE	15,978,155	99.9960	14,499,449	14,500,000	15,072,340					8.375	7.334	JJ	559,962	1,214,375	12/30/1997	07/15/2014
200339-CG-2	COMERICA BANK				1FE	10,173,350	96.7760	9,677,550	10,000,000	10,129,675					5.750	5.521	MN	63,889	575,000	11/30/2006	11/21/2016
20035C-AB-6	COMERICA BANK				1FE	387,952	92.7030	370,813	400,000	391,184					5.200	5.558	FA	7,453	20,800	02/16/2006	08/22/2017
202608-AC-9	COMMERCIAL VEHICLE GROUP				5FE	1,231,200	59.5000	1,285,200	2,160,000	1,275,931					8.000	5.963	JJ	86,400	172,800	06/27/2006	07/01/2013
20453E-AC-3	COMPLETE PRODUCTION SERVER				4FE	1,325,000	98.6250	1,341,300	1,360,000	1,325,858					8.000	8.477	JD	4,836	88,800	10/08/2009	12/15/2016
205887-AC-6	CONAGRA FOODS INC SUB NOTES				2FE	18,497,658	127.8870	21,226,751	16,598,000	17,980,659					9.750	8.578	MS	539,435	1,618,305	01/24/2001	03/01/2021
205887-AF-9	CONAGRA FOODS INC SR NTS				2FE	9,476,188	108.5530	9,118,427	8,400,000	9,357,868					7.125	6.022	AO	149,625	598,500	05/01/2008	10/01/2026
205887-AG-5	CONAGRA FOODS INC				2FE	1,168,710	103.0250	1,030,247	1,000,000	1,148,388					6.700	5.384	FA	27,917	67,000	06/29/2005	08/01/2027
205887-AR-3	CONAGRA FOODS INC SR NTS				2FE	5,146,640	107.1640	5,358,185	5,000,000	5,140,414					7.000	6.734	AO	87,500	350,000	03/20/2008	10/01/2028
205887-AW-2	CONAGRA FOODS INC UNSEC'D NTS				2FE	2,012,469	104.6830	1,728,321	1,651,000	1,682,760					7.875	4.173	MS	38,283	130,016	03/15/2004	09/15/2010
205887-AX-0	CONAGRA FOODS INC BONDS				2FE	26,495,370	119.8700	26,371,400	22,000,000	26,039,803					8.250	6.574	MS	534,417	1,815,000	06/29/2005	09/15/2030
205887-BF-8	CONAGRA FOODS INC				2FE	15,649,800	113.1810	16,977,090	15,000,000	15,616,128					7.000	6.401	AO	221,667	527,917	04/17/2009	04/15/2019
20825C-AR-5	CONOCOPHILLIPS				1FE	18,855,360	109.4550	19,701,846	18,000,000	18,820,751					5.750	5.116	FA	431,250	511,750	06/24/2009	02/01/2019
209111-ED-1	CONS EDISON NY UNSEC'D DEBS SER O3-C				1FE	863,240	91.7930	917,933	1,000,000	874,657					5.100	6.113	JD	2,267	51,000	06/28/2004	06/15/2033
209615-BX-0	CONSOL NATURAL GAS CO SR UNSEC'D NTS SER C				2FE	6,196,199	107.6520	6,082,338	5,650,000	5,793,255					6.250	4.787	MN	58,854	353,125	10/31/2003	11/01/2011
210371-AF-7	CONSTELLATION ENERGY GRP BONDS				2FE	10,900,049	108.5930	9,393,277	8,650,000	10,706,567					7.600	5.701	AO	164,350	657,400	06/30/2005	04/01/2032
210371-AK-6	CONSTELLATION ENERGY GRP BASIC				2FE	16,978,210	100.2700	18,048,582	18,000,000	17,380,458											

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
224044-BD-8	COX COMMUNICATIONS INC.				2FE	5,564,950	105.1440	5,257,220	5,000,000	5,100,761		(79,513)			6.750	4.999	MS	99,375	337,500	04/17/2003	03/15/2011
224044-BM-8	COX COMMUNICATIONS INC.				2FE	10,028,400	107.1350	10,016,520	10,000,000	10,016,716		(2,872)			5.450	5.411	JD	24,222	545,000	05/26/2005	12/15/2014
224050-AL-8	COX ENTERPRISES NOTES 144A				2FE	2,105,620	103.9350	2,078,694	2,000,000	2,028,702		(39,077)			7.875	5.754	MS	46,375	157,500	12/18/2007	09/15/2010
226566-AC-1	CRICKET COMMUNICATIONS I				4FE	243,125	100.5000	251,250	250,000	243,331		206			9.375	10.086	MN	3,906	11,719	10/21/2009	11/01/2014
233331-AJ-6	DTE ENERGY BASIC				2FE	53,290,553	94.0460	47,305,037	50,300,000	53,049,459		(55,039)			6.375	5.936	AO	876,954	3,206,625	03/21/2005	04/15/2033
233393-AB-3	DA-LITE SCREEN				4FE	2,019,875	99.1250	1,883,375	1,900,000	1,913,024		(33,609)			9.500	7.578	MN	23,064	180,500	01/16/2007	05/15/2010
235851-AH-5	DANAHER CORP				1FE	51,313,750	105.6090	53,596,568	50,750,000	51,279,760		(33,990)			5.400	5.254	MS	913,500	1,339,800	03/20/2009	03/01/2019
237194-AB-1	DARDEN RESTAURANTS UNSEC'D DEBS				2FE	9,864,540	109.1700	9,825,300	9,000,000	9,523,320		(69,484)			7.125	5.971	FA	267,188	641,250	05/13/2004	02/01/2016
237194-AA-1	DARDEN RESTAURANTS MTN				2FE	9,988,700	104.2530	10,425,270	10,000,000	9,998,007		1,474			7.450	7.467	AO	186,250	745,000	04/11/2001	04/01/2011
239753-BC-9	DAYTON-HUDSON DEBS				1FE	11,608,375	123.7710	14,233,654	11,500,000	11,566,890		(4,344)			9.875	9.778	JJ	567,813	1,135,625	10/11/1991	07/01/2020
239753-BM-7	DAYTON-HUDSON DEBS				1FE	10,182,880	128.5290	12,852,900	10,000,000	10,129,390		(5,701)			8.800	8.628	MN	112,444	880,000	11/03/1992	05/15/2022
239753-DL-7	DAYTON-HUDSON UNSEC'D DEB				1FE	524,350	105.6930	528,466	500,000	520,626		(574)			6.650	6.271	FA	13,854	33,250	11/07/2001	08/01/2028
242361-AB-9	DEAN FOODS CO BASIC				4FE	5,984,140	95.2500	5,528,310	5,804,000	5,928,910		(11,976)			6.900	6.543	AO	84,545	400,476	09/08/2004	10/15/2017
24240V-AM-3	DEAN WITTER, DISCOVER DEBS				1FE	2,524,236	107.4550	2,901,290	2,700,000	2,616,694		10,545			6.750	7.392	JJ	91,125	182,250	07/17/1996	01/01/2016
244199-AU-9	DEERE & CO DEBS				1FE	54,715	125.9110	54,142	43,000	52,184		(510)			8.500	5.983	JJ	1,746	3,655	04/20/2004	01/09/2022
244199-BB-0	DEERE & CO NTS				1FE	21,725,016	115.4340	21,731,680	18,826,000	21,521,399		(203,616)			6.950	3.356	AO	239,875	654,204	08/20/2009	04/25/2014
24422E-QR-3	JOHN DEERE CAPITAL CORP MTN				1FE	5,327,000	105.6840	5,284,210	5,000,000	5,317,176		(9,824)			5.350	4.424	AO	65,389	133,750	09/03/2009	04/03/2018
24422E-QU-6	JOHN DEERE CAPITAL CORP MTN				1FE	6,334,680	107.4960	6,449,784	6,000,000	6,301,322		(33,358)			4.900	3.437	MS	92,283	147,000	07/21/2009	09/09/2013
24422E-QV-4	JOHN DEERE CAPITAL CORP MTN				1FE	11,819,208	108.4310	12,740,678	11,750,000	11,816,228		(2,979)			5.750	5.667	MS	212,071	337,813	04/24/2009	09/10/2018
24422E-QW-2	JOHN DEERE CAPITAL CORP MTN				1FE	10,742,300	107.9940	10,799,360	10,000,000	10,661,496		(80,804)			5.250	2.732	AO	131,250	263,958	09/18/2009	10/01/2012
247361-ZC-5	DELTA AIRLINES 144A				3FE	192,198	103.8750	202,556	195,000	195,000		110			9.500	9.875	MS	4,786		09/24/2009	09/15/2014
247916-AB-5	DENBURY RESOURCES INC				4FE	556,896	106.7500	640,500	600,000	560,764		3,868			9.750	11.250	MS	19,500	32,175	02/10/2009	03/01/2016
250847-DU-1	DETROIT EDISON CO FMB				1FE	827,200	106.3550	850,837	800,000	824,439		(486)			6.350	6.100	AO	10,724	50,800	04/02/2003	10/15/2032
251591-AK-9	DEVELOPERS DIVERS REALTY BASIC				3FE	4,979,817	98.8630	4,943,130	5,000,000	4,995,477		3,317			5.250	5.324	AO	55,417	262,500	10/06/2004	04/15/2011
25389M-AB-5	DIGITALGLOBE INC 144A				3FE	178,098	107.0000	197,950	185,000	178,828		730			10.500	11.500	MN	3,238	9,874	04/21/2009	05/01/2014
25467L-AA-7	Discovery Communications Inc.				2	20,000,000	106.7260	21,345,200	20,000,000	20,000,000					6.010	6.010	JD	100,167	1,202,000	11/04/2005	12/01/2015
254687-AH-9	THE WALT DISNEY CO. MTN				1FE	10,467,725	109.9330	11,927,709	10,850,000	10,467,939		22			7.550	7.826	JJ	377,731	819,175	01/06/1995	07/15/2093
25468P-BF-2	THE WALT DISNEY CO NOTES MTN				1FE	2,230,300	102.8670	2,057,340	2,000,000	2,019,738		(38,521)			6.800	4.758	FA	56,667	136,000	10/31/2003	06/28/2010
25468P-CK-0	THE WALT DISNEY CO				1FE	28,970,780	107.1420	31,071,151	29,000,000	28,972,723		1,943			5.500	5.513	MS	469,639	793,069	04/02/2009	03/15/2019
257469-AG-1	DOMINION RESOURCES INC BASIC				2FE	7,488,584	109.3940	7,438,758	6,800,000	7,432,300		(12,598)			6.750	5.999	JD	20,400	459,000	01/14/2005	12/15/2032
25746U-AJ-8	DOMINION RESOURCES SR NOTES SER B				2FE	10,357,850	108.0080	10,800,780	10,000,000	10,156,396		(56,922)			6.250	5.570	JD	1,736	625,000	02/24/2006	06/30/2012
25746U-AT-6	DOMINION RESOURCES				2FE	952,351	115.5000	1,039,500	900,000	949,488		(2,863)			2.125	1.681	JD	850	19,125	04/29/2009	12/15/2023
25746U-AW-9	DOMINION RESOURCES				2FE	9,983,700	105.8370	10,583,710	10,000,000	9,989,974		1,527			5.150	5.171	JJ	237,472	515,000	07/11/2005	07/15/2015
257867-AR-2	RR DONNELLEY & SONS CO BASIC				2FE	62,402,156	96.8220	60,126,338	62,100,000	62,292,136		(30,132)			5.500	5.433	MN	436,425	3,415,500	12/13/2005	05/15/2015
260543-BA-0	DOW CHEMICAL DEBS				2FE	5,390,865	106.9940	4,814,717	4,500,000	5,186,884		(39,071)			9.000	7.015	AO	101,250	405,000	10/14/2003	04/01/2021
260543-BV-4	DOW CHEMICAL BASIC				2FE	32,638,060	101.5860	34,132,829	33,600,000	32,720,823		72,338			5.700	6.086	MN	244,720	1,915,200	12/02/2008	05/15/2018
263534-BG-3	DUPONT (EI) DE NEMOURS DEBS				1FE	9,955,000	110.0100	11,001,030	10,000,000	9,963,201		1,047			6.500	6.535	JJ	299,722	650,000	10/10/2001	01/15/2028
263534-BS-7	DUPONT (EI) DE NEMOURS BASIC				1FE	16,793,725	107.0930	16,977,517	15,853,000	16,743,257		(51,155)			5.000	3.039	JJ	365,500	175,000	10/21/2009	01/15/2013
263534-BT-5	DUPONT (EI) DE NEMOURS BASIC				1FE	14,588,730	109.1170	15,603,717	14,300,000	14,558,180		(22,856)			6.000	5.730	JJ	395,633	827,017	08/19/2008	07/15/2018
263534-BU-2	DUPONT (EI) DE NEMOURS BASIC				1FE	12,157,134	107.7250	13,277,669	12,325,000	12,194,240		32,946			5.000	5.333	JJ	284,160	593,997	11/17/2008	07/15/2013
263534-BV-0	DUPONT (EI) DE NEMOURS BASIC				1FE	9,953,100	110.4640	11,046,380	10,000,000	9,962,435		9,300			5.875	5.981	JJ	270,903	347,604	12/09/2008	01/15/2014
26439R-AK-2	DUKE CAPITAL CORP SR UNSEC'D NTS				2FE	3,811,360	101.3580	4,054,324	4,000,000	3,828,207		3,129			6.750	7.139	FA	102,000	270,000	09/26/2003	02/15/2032
26439X-AB-9	DUKE ENERGY FIELD SRVCS UNSEC'D NTS				2FE	1,482,741	103.9620	1,351,511	1,300,000	1,321,141		(32,511)			7.875	5.192	FA	38,391	102,375	06/01/2004	08/16/2010
26441Y-AD-9	DUKE REALTY CORP SR NTS				2FE	341,100	101.4180	309,323	305,000	311,820		(5,382)			6.950	5.007	MS	6,241	21,198	10/30/2003	03/15/2011
26441Y-AN-7	DUKE REALTY CORP SERIES 144A				2FE	305,989	98.2500	319,313	325,000	314,624		4,941			3.750	5.520	JD	1,016	12,188	07/21/2008	12/01/2011
267482-AC-1	DYCOM INDUSTRIES INC				3FE	1,000,903	92.0000	920,000	1,000,000	1,000,572		(124)			8.125	8.107	AO	17,153	81,250	03/23/2006	10/15/2013
268648-AK-8	EMC CORP MASS BASIC				1FE	805,292	121.5000	1,002,375	825,000	811,676		6,291			1.750	2.620	JD	1,203	14,438	03/10/2009	12/01/2011
26882P-AN-2	ERAC USA FINANCE CO NOTES 144A				2FE	3,675,210	104.8510	3,381,435	3,225,000	3,293,860											

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
278058-DF-6	EATON CORP				1FE	5,374,500	105.8170	5,290,840	5,000,000	5,370,140			(4,360)		4.900	2.581	MN	31,306		12/14/2009	05/15/2013
281023-AX-9	EDISON MISSION BASIC				4FE	11,014,692	75.7500	8,332,500	11,000,000	11,012,945			(941)		7.200	7.183	MN	101,200	792,000	11/20/2007	05/15/2019
281023-BA-8	EDISON MISSION				4FE	4,019,824	67.7500	2,710,000	4,000,000	4,018,817			(514)		7.625	7.576	MN	38,972	305,000	11/20/2007	05/15/2027
283677-AW-2	EL PASO ELECTRIC CO BASIC				2FE	50,729,130	89.9290	44,964,600	50,000,000	50,683,087			(11,731)		6.000	5.895	MN	383,333	3,000,000	06/29/2005	05/15/2035
283695-AZ-7	EL PASO NATURAL GAS DEBS				2FE	18,535,050	116.6890	21,004,056	18,000,000	18,373,070			(18,543)		8.625	8.343	JJ	715,875	1,552,500	03/27/1996	01/15/2022
291011-AP-9	EMERSON ELECTRIC CO				1FE	16,612,800	110.2460	16,536,930	15,000,000	16,482,480			(130,320)		5.625	2.906	MN	107,813	421,875	08/18/2009	11/15/2013
291011-AZ-7	EMERSON ELECTRIC CO				1FE	4,987,650	103.4260	5,171,315	5,000,000	4,988,948			1,298		4.125	4.172	AO	43,542	101,979	04/14/2009	04/15/2015
291011-BA-1	EMERSON ELECTRIC CO				1FE	4,952,750	103.0620	5,153,085	5,000,000	4,955,361			2,611		5.000	5.122	AO	52,778	123,611	04/14/2009	04/15/2019
29250R-AF-3	ENBRIDGE ENERGY PARTNERS BASIC				2FE	7,032,940	104.2070	7,294,476	7,000,000	7,018,679			(3,262)		5.350	5.288	JD	16,644	374,500	02/09/2005	12/15/2014
29265A-AR-7	ENERGEN CORP MTN SER A				2FE	10,000,000	94.8230	9,482,310	10,000,000	10,000,000					7.350	7.351	AO	183,750	735,000	07/24/1997	07/28/2027
29266M-AA-7	ENERGY EAST CORP UNSEC'D NTS				1FE	1,175,760	105.7430	1,057,430	1,000,000	1,023,457			(25,720)		8.050	5.253	MN	10,286	80,500	02/18/2003	11/15/2010
29266M-AD-1	ENERGY EAST CORP UNSEC'D NTS				1FE	2,295,340	109.2950	2,185,892	2,000,000	2,093,708			(35,241)		6.750	4.705	JD	5,000	135,000	07/07/2003	06/15/2012
29266M-AE-9	ENERGY EAST CORP UNSEC'D NTS				1FE	2,724,804	104.3390	2,702,388	2,590,000	2,713,133			(2,192)		6.750	6.359	MS	51,476	174,825	12/30/2003	09/15/2033
29273R-AB-5	ENERGY TRANSFER PARTNERS				2FE	27,264,929	105.9600	28,609,281	27,000,000	27,158,880			(26,428)		5.950	5.814	FA	669,375	1,606,500	02/09/2005	02/01/2015
293489-AA-8	ENOGEX INC NOTES 144A				2FE	7,442,185	100.1060	6,506,903	6,500,000	6,506,479			(167,735)		8.125	5.434	JJ	743,524	528,125	09/04/2003	01/15/2010
293562-AD-6	ENRON OIL AND GAS NTS				1FE	2,795,266	105.5250	2,739,627	3,070,000	2,834,886			5,944		6.650	7.423	AO	151,039	204,155	06/18/2001	04/01/2028
29364D-AJ-9	ENERGY ARKANSAS INC FMB				1FE	2,990,430	96.1010	2,883,030	3,000,000	2,991,310			169		5.900	5.923	JD	14,750	177,000	06/04/2003	06/01/2033
29364N-AM-0	ENERGY MISSISSIPPI INC FMB				2FE	4,993,700	103.2950	5,164,725	5,000,000	4,998,660			955		4.650	4.671	MN	38,750	232,500	04/19/2004	05/01/2011
293791-AR-0	ENTERPRISE PRODUCTS OPER BASIC				2FE	5,665,862	102.7770	5,858,278	5,700,000	5,679,589			3,779		5.000	5.080	MS	95,000	285,000	08/17/2005	03/01/2015
294549-AE-0	EQUITABLE RESOURCES INC				2FE	4,980,050	104.3640	5,218,210	5,000,000	4,983,871			468		7.750	7.785	JD	178,681	387,500	07/23/1996	07/15/2026
294549-AR-1	EQUITABLE RESOURCES INC				2FE	11,874,699	102.5930	13,039,583	12,710,000	11,916,618			41,919		6.500	7.530	AO	206,538	413,075	05/27/2009	04/01/2018
296313-AA-7	ESCO CORP SERIES 144A				4FE	1,487,500	99.5000	1,447,725	1,455,000	1,473,274			(5,316)		8.625	8.136	JD	5,577	125,494	03/07/2007	12/15/2012
296313-AB-5	ESCO CORP SERIES 144A				4FE	1,104,300	91.1250	984,150	1,080,000	1,086,198			(6,496)		4.129	8.645	MUSD	1,982	53,331	01/04/2007	12/15/2010
300674-AA-6	EXCEL PARALUBES FUNDING CORP SR BONDS 144A				2FE	9,198,000	111.1310	10,251,835	9,225,000	9,214,250			2,348		7.430	7.466	MN	114,236	685,418	01/28/2000	11/01/2015
302106-AB-5	EXOPAC HOLDING CORP				4FE	3,119,777	101.6250	3,099,563	3,050,000	3,083,368			(13,798)		11.250	10.647	FA	142,969	343,125	02/27/2007	02/01/2012
30212P-AC-9	EXPEDIA INC 144A				3FE	2,416,021	108.1250	2,665,281	2,465,000	2,422,702			4,628		8.500	8.852	JJ	104,763	213,599	09/09/2008	07/01/2016
302182-AC-4	EXPRESS SCRIPTS INC				2FE	4,128,920	106.2600	4,250,404	4,000,000	4,108,289			(20,631)		5.250	4.079	JD	9,333	108,500	06/29/2009	06/15/2012
302182-AD-2	EXPRESS SCRIPTS INC				2FE	26,623,281	109.1130	28,249,356	25,890,000	26,559,120			(64,161)		6.250	5.578	JD	71,917	836,031	07/14/2009	06/15/2014
302182-AE-0	EXPRESS SCRIPTS INC				2FE	30,610,749	113.6180	33,057,273	29,095,000	30,555,759			(54,900)		7.250	6.519	JD	93,751	1,089,850	07/14/2009	06/15/2019
302508-AM-8	FMR CORP NOTES 144A				1FE	2,644,625	109.3690	2,734,228	2,500,000	2,598,552			(7,185)		7.490	6.915	JD	8,322	187,250	12/10/2001	06/15/2019
302508-AQ-9	FMR CORP BONDS 144A				1FE	24,660,460	105.5400	23,218,844	22,000,000	24,307,752			(57,940)		7.570	6.601	JD	74,018	1,665,400	09/26/2002	06/15/2029
302567-AA-0	FPL ENERGY AMERICAN WIND NTS 144A				2FE	4,499,250	99.3200	4,468,655	4,499,250	4,499,250					6.639	6.533	JUN	158,480	298,705	06/27/2003	06/20/2023
302568-AA-8	FPL ENERGY CALTHNESS FUNDING SR SEC NOTES 144A				2FE	6,091,466	102.7150	6,256,849	6,091,466	6,091,466					7.645	7.646	JD	1,294	465,693	07/06/1998	12/31/2018
302569-AA-6	FPL ENERGY VIRGINIA FDG SR NTS 144A				3FE	10,996,978	100.7810	10,567,525	10,485,632	10,907,281			(39,186)		7.520	6.556	JD	2,190	788,520	06/16/2003	06/30/2019
313309-AP-1	FEDERAL EXPRESS CORP DEBS				2FE	21,363,814	94.8850	20,348,002	21,445,000	21,364,480			(1)		7.600	7.628	JJ	814,910	1,629,820	05/12/2003	07/01/2097
31331F-AF-8	FEDERAL EXPRESS				2FE	564,621	110.4310	623,518	564,621	564,621					7.960	7.962	MS	11,611	44,944	12/02/1993	03/28/2017
31331F-AP-6	FEDERAL EXPRESS PTC'S				2FE	14,479,645	105.8120	15,342,723	14,500,000	14,483,108			1,442		7.580	7.598	JJ	546,497	1,099,100	01/25/2001	07/02/2019
31331F-AT-8	FEDERAL EXPRESS PTC 96 SER B2				2FE	2,000,000	103.3870	2,067,731	2,000,000	2,000,000					7.840	7.840	JJ	65,769	156,800	10/17/1996	01/30/2018
31331F-AV-3	FEDERAL EXPRESS EETC 1997-B				2FE	5,877,902	105.0820	5,892,384	5,607,401	5,695,429			(13,124)		7.520	6.886	JJ	194,440	421,677	07/29/1998	01/15/2018
316773-AD-2	FIFTH THIRD BANCORP SUB NOTES				2FE	3,601,523	81.5780	3,018,379	3,700,000	3,618,361			7,267		4.500	4.811	JD	13,878	166,500	12/18/2007	06/01/2018
318169-AA-7	FIREKEEPERS DEV AUTHORIT 144A				4FE	1,118,175	113.5000	1,339,300	1,180,000	1,126,945			6,024		13.875	15.401	FMAN	27,288	163,725	09/25/2008	05/01/2015
319963-AP-9	FIRST DATA CORP BASIC				5FE	6,390,262	93.2500	6,900,500	7,400,000	6,511,810			100,551		9.875	12.904	MS	184,717	730,750	10/14/2008	09/24/2015
337158-AE-9	FIRST TENNESSEE BANK				2FE	4,567,164	86.7350	3,989,787	4,600,000	4,577,422			2,930		5.650	5.745	AO	64,975	259,900	03/29/2006	04/01/2016
33716M-AA-5	FIRST TENNESSEE BANK SUB BK NOTES				2FE	4,000,000	92.9620	3,718,476	4,000,000	4,000,000					4.625	4.625	MN	23,639	185,000	04/28/2003	05/15/2013
340711-AG-5	FLORIDA GAS TRANS CO SR NOTES 144A				2FE	13,996,875	118.8380	16,043,130	13,500,000	13,917,581			(14,444)		9.190	8.804	MN	206,775	1,240,650	02/10/2003	11/01/2024
340711-AM-2	FLORIDA GAS TRANS CO SR NTS 144A				2FE	11,511,900	104.9950	10,499,500	10,000,000	10,224,944			(234,649)		7.625	5.075	JD	63,542	762,500	10/31/2003	12/01/2010
340711-AQ-3	FLORIDA GAS TRANS CO 144A				2FE	42,672,615	117.0440	47,402,618	40,500,000	42,582,268			(90,347)		7.900	7.134	JD	408,825	1,661,963	06/23/2009	05/15/2019
341099-BZ-1	FL PWR CORP FMB				1FE	649,170	10														



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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
351807-AH-5	FRANCHISE FIN CORP OF AMERICA NTS				1FE	9,920,500	105.7740	10,577,430	10,000,000	9,991,190				10,415	8.750	8.869	AO	184,722	875,000	09/18/2000	10/15/2010
35638P-AA-8	FREEDOM GROUP INC 144A				4FE	293,481	106.1250	318,375	300,000	318,821				340	10.250	10.750	FA	12,983		07/16/2009	08/01/2015
36155W-AC-0	GCI INC				4FE	1,444,500	99.1250	1,675,213	1,690,000	1,500,163				34,970	7.250	10.688	FA	46,287	122,525	07/22/2008	02/15/2014
362320-AT-0	GTE CORP DEBS				1FE	6,973,200	123.0970	7,385,808	6,000,000	6,672,695				(34,812)	8.750	7.317	MN	87,500	525,000	10/24/1997	11/01/2021
362333-AH-9	GTE FLA INC DEBS				1FE	3,997,920	96.1860	3,847,448	4,000,000	3,998,331				46	6.860	6.864	FA	114,333	274,400	01/29/1998	02/01/2028
367905-AE-6	GAYLORD ENTERTAINMENT CO BASIC				4Z	851,117	101.8750	916,875	900,000	851,867				750	3.750	5.029	AO	8,625		12/03/2009	10/01/2014
36804P-AL-0	Gatx Financial Corp				2FE	4,983,700	104.3430	5,217,165	5,000,000	4,992,792				3,118	5.500	5.573	FA	103,889	275,000	11/16/2006	02/15/2012
368907-AD-3	GENERAL AMERICAN TRANS				1FE	7,936,028	100.1300	7,946,314	7,936,028	7,936,028					7.860	7.860	FA	213,122	623,772	08/23/1996	08/28/2021
369300-AL-2	GENERAL CABLE CORP BASIC				4FE	461,527	102.8750	504,088	490,000	461,390				(137)	4.500	4.017	MN	796		12/18/2009	11/15/2029
369550-AN-8	GENERAL DYNAMICS CORP				1FE	14,929,200	108.7970	16,319,520	15,000,000	14,943,437				14,058	5.250	5.354	FA	328,125	494,375	12/08/2008	02/01/2014
36959C-AA-6	GENERAL ELECTRIC CAP CORP SUB NOTES				1FE	10,569,615	108.4270	11,384,835	10,500,000	10,566,186				(1,049)	7.500	7.443	FA	284,375	787,500	04/29/2004	08/21/2035
36962G-3P-7	GENERAL ELEC CAP CORP BASIC				1FE	51,354,550	92.5880	50,923,565	55,000,000	51,435,566				45,096	5.875	6.374	JJ	1,498,941	3,231,250	04/17/2008	01/14/2038
370334-AS-3	GENERAL MILLS INC NOTES				2FE	4,849,900	107.9680	5,048,565	4,676,000	4,785,433				(47,857)	6.000	4.826	FA	105,989	280,560	08/19/2008	02/15/2012
370334-BB-9	GENERAL MILLS INC				2FE	7,737,902	108.1450	8,040,603	7,435,000	7,710,699				(27,203)	5.700	5.073	FA	160,100	211,898	02/17/2009	02/15/2017
370334-BE-3	GENERAL MILLS INC				2FE	15,059,500	108.7880	16,318,155	15,000,000	15,034,042				(11,464)	5.650	5.558	MS	261,313	847,500	08/28/2007	09/10/2012
370334-BF-0	GENERAL MILLS INC BASIC				2FE	12,509,247	106.7140	13,627,416	12,770,000	12,552,049				35,389	5.200	5.569	MS	191,834	664,040	02/25/2009	03/17/2015
370334-BG-8	GENERAL MILLS INC BASIC				2FE	11,781,568	107.8840	12,875,955	11,935,000	11,813,293				29,668	5.250	5.562	FA	236,711	643,993	11/17/2008	08/15/2013
370334-BH-6	GENERAL MILLS INC				2FE	6,993,980	106.0550	7,423,857	7,000,000	6,994,577				597	5.650	5.661	FA	149,411	210,933	01/29/2009	02/15/2019
37048E-AA-2	INTERNATIONAL GROUP Private Placement				2	12,350,000		11,793,756	12,350,000	12,350,000					6.570	6.570	JD	6,762	875,796	06/05/2007	06/28/2020
373298-BR-8	GEORGIA-PACIFIC GROUP NOTES				3FE	2,656,176	98.7500	2,878,563	2,915,000	2,685,689				4,256	7.750	8.581	MN	28,867	225,913	06/02/2000	11/15/2029
377372-AC-1	GLAXOSMITHKLINE CAP INC				1FE	8,512,005	107.3450	8,792,621	8,191,000	8,453,817				(58,188)	4.850	3.826	MN	50,761	397,264	03/04/2009	05/15/2013
377372-AD-9	GLAXOSMITHKLINE CAP INC BASIC				1FE	20,625,420	107.8590	22,650,453	21,000,000	20,655,189				29,613	5.650	5.895	MN	151,608	1,186,500	11/13/2008	05/15/2018
377372-AE-7	GLAXOSMITHKLINE CAP INC GLAXOSMITHKLINE CAP INC				1FE	19,938,800	110.7890	22,157,520	20,000,000	19,940,091				736	6.375	6.398	MN	162,917	1,275,000	05/06/2008	05/15/2038
38141G-DB-7	GOLDMAN SACHS NTS				1FE	2,999,310	105.9180	3,177,543	3,000,000	2,999,738				72	5.250	5.253	AO	39,375	157,500	03/26/2003	04/01/2013
382388-AL-0	GOODRICH CORPORATION UNSEC'D NTS				2FE	10,042,295	106.5530	12,253,607	11,500,000	10,123,834				12,469	7.000	8.082	AO	169,944	805,000	08/14/2001	04/15/2038
382388-AP-1	GOODRICH CORPORATION				2FE	3,237,885	111.9800	3,191,427	2,850,000	3,216,383				(21,502)	7.625	3.040	JD	9,658	108,656	10/21/2009	12/15/2012
382388-AS-5	GOODRICH CORP				2FE	3,347,006	107.2710	3,293,226	3,070,000	3,341,224				(5,782)	6.290	4.697	JJ	96,552		10/27/2009	07/01/2016
382388-AV-8	GOODRICH CORPORATION				2FE	3,252,450	108.0220	3,240,648	3,000,000	3,246,305				(6,145)	6.125	4.997	MS	61,250		09/14/2009	03/01/2019
386088-AB-4	GRAND METROPOLITAN INV CORP NTS				1FE	12,535,500	111.1800	11,118,000	10,000,000	10,658,438				(381,932)	9.000	4.733	FA	340,000	900,000	07/20/2004	08/15/2011
386088-AF-5	GRAND METROPOLITAN INV CORP				1FE	11,583,140	123.1480	12,314,810	10,000,000	11,229,042				(63,480)	8.000	6.534	MS	235,556	800,000	09/24/2003	09/15/2022
38669P-AD-6	GRAPHIC PACKAGING INTL				4FE	7,555,000	103.2500	8,001,875	7,750,000	7,633,802				23,451	9.500	9.976	FA	278,139	736,250	06/23/2006	08/15/2011
393657-AB-7	GREENBRIER COMPANIES INC.				5FE	1,000,000	82.6250	826,250	1,000,000	1,000,000					8.375	8.375	MN	10,701	83,750	09/14/2005	05/15/2015
39538F-AA-3	GREENPOINT BANK				2FE	6,224,150	104.6210	5,231,060	5,000,000	5,162,191				(208,718)	9.250	4.771	AO	115,625	462,500	04/28/2004	10/01/2010
404119-BB-4	HCA - THE HEALTHCARE CO BASIC				4FE	1,051,000	108.2500	1,137,708	1,051,000	1,051,000					9.625	10.243	MN	12,926	102,411	05/15/2009	11/15/2016
404119-BB-4	HCA - THE HEALTHCARE CO 144A				4FE	96,673	110.5000	110,500	100,000	96,915				242	9.875	10.501	FA	3,731	4,828	02/11/2009	02/15/2017
40429C-CR-1	HSBC FINANCE CORP BASIC				1FE	23,005,059	103.8920	23,427,623	22,550,000	22,819,355				(43,542)	5.250	4.990	AO	249,929	1,183,875	04/28/2005	04/15/2015
41163G-AD-3	HARCOURT GEN INC.				2FE	12,439,992	114.5550	11,684,559	10,200,000	12,115,686				(96,990)	8.875	6.631	JD	75,438	905,250	05/08/2006	06/01/2022
41163G-AF-8	HARCOURT GEN INC.				2FE	5,596,450	88.2400	4,588,464	5,200,000	5,500,518				(10,772)	7.200	6.530	FA	156,000	374,400	05/22/2006	08/01/2027
41242*-AG-7	HARDWOOD FUND PRIVATE PLACEMENT				2	20,000,000	120.3490	24,069,800	20,000,000	20,000,000					8.270	8.259	JD	110,267	1,281,850	02/04/2009	02/27/2016
413875-AE-5	HARRIS CORPORATION DEBS				2FE	9,950,300	102.3240	10,232,410	10,000,000	9,961,930				1,252	7.000	7.004	JJ	322,778	700,000	01/10/1996	01/15/2026
413875-AJ-4	HARRIS CORPORATION				2FE	4,147,300	103.3010	5,165,055	5,000,000	4,236,839				89,539	5.000	8.404	AO	62,500	250,000	02/10/2009	10/01/2015
413875-AL-9	HARRIS CORPORATION				2FE	27,572,552	107.9780	29,154,114	27,000,000	27,550,497				(22,055)	6.375	6.087	JD	76,500	889,313	06/24/2009	06/15/2019
416515-AP-9	HARTFORD FINANCIAL SVCS GRP				2FE	6,494,540	79.9180	5,194,683	6,500,000	6,494,569				29	6.100	6.106	AO	99,125	396,500	10/10/2006	10/01/2041
418056-AR-8	HASBRO INC				2FE	42,360,166	108.8750	45,117,759	41,440,000	42,283,570				(76,596)	6.125	5.589	MN	324,326	1,283,201	09/29/2009	05/15/2014
42210P-AM-4	HEADWATERS INC 144A				4FE	402,384	104.2500	417,000	400,000	402,334				(50)	11.375	11.156	MN	8,089		10/22/2009	11/01/2013
42307T-AC-2	HEINZ H J CO UNSEC'D NTS				2FE	9,774,070	107.3790	9,234,585	8,600,000	8,859,486				(159,338)	6.625	4.571	JJ	262,718	569,750	11/18/2003	07/15/2011
42307T-AF-5	HEINZ H J CO UNSEC'D NTS				2FE	1,664,660	107.2690	1,587,574	1,480,000	1,537,047				(24,270)	6.000	4.149	MS	26,147	88,800	03/16/2004	03/15/2012
42307T-AH-1	HEINZ H J CO 144A				2FE	40,052,050	113.0540	38,438,292	34,000,000	40,034,195				(17,855)	7.125	5.855	FA	1,022,833</			

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
438516-AN-6	HONEYWELL INC BONDS				1FE	9,404,998	109.0110	9,244,167	8,480,000	8,710,223		(117,987)			6.125	4.562	MN	86,567	519,400	04/29/2003	11/01/2011
438516-AX-4	HONEYWELL INC BASIC				1FE	7,916,357	105.4730	8,279,631	7,850,000	7,938		9,938			5.300	5.132	MS	138,683	265,000	10/07/2009	03/01/2018
438516-AZ-9	HONEYWELL INC				1FE	20,582,700	103.5470	20,709,340	20,000,000	20,572,607		(10,093)			5.000	4.607	FA	377,778	243,056	10/02/2009	02/15/2019
44044K-AB-7	HORIZON LINES INC BASIC				5FE	1,570,119	81.2500	1,718,438	2,115,000	1,687,927		115,750	107,543		4.250	11.311	FA	33,958	89,888	08/06/2008	08/15/2012
441060-AD-2	HOSPIRA INC BASIC				2FE	45,286,512	108.3360	46,963,656	43,350,000	44,388,952		(202,076)			5.900	5.289	JD	113,673	2,557,650	04/01/2005	06/15/2014
441060-AJ-9	HOSPIRA INC				2FE	10,333,585	104.6620	11,198,781	10,700,000	10,373,066		39,481			6.050	6.563	MS	163,636	496,100	08/18/2009	03/30/2017
442164-BL-2	HOUSTON LIGHT & PWR FMB				2FE	20,383,389	124.9920	25,310,819	20,250,000	20,341,485		(4,697)			9.150	9.084	MS	545,569	1,852,875	10/21/1992	03/15/2021
44332L-AB-6	HUB INTL HOLDINGS SERIES 144A			1	5FE	2,400,000	95.5000	2,292,000	2,400,000	2,400,000					9.000	9.000	JD	9,600	216,000	06/08/2007	12/15/2014
444433-AF-3	HUGHES NTWK SYS				4FE	2,956,344	103.2500	3,030,388	2,935,000	2,945,059		(4,067)			9.500	9.320	AO	58,863	278,825	02/27/2008	04/15/2014
44949R-AD-4	IES UTILITIES SR UNSEC'D NTS SER B				2FE	4,551,400	105.1400	4,205,592	4,000,000	4,097,724		(77,413)			6.750	4.634	MS	79,500	270,000	05/06/2003	03/15/2011
449669-AB-6	IMC GLOBAL INC. SR DEBS				2FE	4,932,400	106.4220	5,023,137	4,720,000	4,778,388		(26,333)			9.450	8.747	JD	19,824	446,040	04/12/2002	12/15/2011
450679-BW-4	ITT CORP				2FE	39,327,761	104.7860	40,918,738	39,050,000	39,295,291		(32,470)			4.900	4.738	MN	318,908	956,725	05/06/2009	05/01/2014
450679-BX-2	ITT CORP				2FE	28,975,132	107.9820	30,488,577	28,235,000	28,949,319		(25,812)			6.125	5.766	MN	288,232	864,697	10/06/2009	05/01/2019
451866-SX-6	ILLINOIS CENTRAL RR DEBS			1	1FE	10,105,200	103.0470	10,304,730	10,000,000	10,101,969		(505)			7.700	7.617	MS	226,722	770,000	08/12/1997	09/15/2046
452308-AH-2	ILLINOIS TOOL WORKS				1FE	39,971,072	108.9460	43,578,200	40,000,000	39,973,378		2,305			5.150	5.168	AO	515,000	1,058,611	09/21/2009	04/01/2014
452308-AJ-8	Illinois Tool Works Inc				1FE	49,661,056	111.7350	55,420,659	49,600,000	49,600,474		(582)			6.250	6.232	AO	775,000	1,593,056	09/21/2009	04/01/2019
459200-AM-3	INTL BUSINESS MACHINES NTS				1FE	16,412,100	114.6400	17,195,970	15,000,000	16,180,118		(42,886)			7.000	6.212	AO	177,917	1,050,000	08/06/2003	10/30/2025
45974V-ZY-7	INTL LEASE FINANCE BASIC				2FE	9,980,600	92.1630	9,216,300	10,000,000	9,994,751		4,035			5.450	5.495	MS	146,847	545,000	03/21/2006	03/24/2011
460146-BU-6	INTERNATIONAL PAPER CO NOTES				2FE	10,044,950	103.0900	10,309,030	10,000,000	10,026,123		(4,233)			5.300	5.242	AO	132,500	530,000	07/01/2005	04/01/2015
46294*-AB-4	Iron Ore of Canada				2	22,222,223	109.4920	24,331,557	22,222,223	22,222,223					6.600	6.600	AO	248,519	1,485,000	10/11/2005	11/02/2017
465685-AC-9	ITC HOLDINGS CORP SERIES 144A				2FE	20,356,830	100.9960	20,603,184	20,400,000	20,368,522		3,678			5.875	5.903	MS	302,954	1,198,500	01/22/2007	09/30/2016
465685-AD-7	ITC HOLDINGS CORP BASIC 144A				2FE	26,003,770	92.5790	23,376,097	25,250,000	25,976,607		(10,648)			6.375	6.154	MS	406,893	1,609,898	06/22/2007	09/30/2036
465685-AE-5	ITC HOLDINGS CORP 144A				2FE	9,019,382	100.9920	10,250,637	10,150,000	9,086,008		66,626			6.050	7.825	JJ	257,570	307,038	04/16/2009	01/31/2018
46625H-BA-7	JPMORGAN CHASE & CO NTS				1FE	2,993,010	103.3740	3,101,229	3,000,000	2,999,016		1,086			4.500	4.539	MN	17,250	135,000	11/04/2003	11/15/2010
47102X-AF-2	JANUS CAPITAL GROUP INC				3FE	1,011,488	94.2550	1,343,139	1,425,000	1,031,560		20,073			6.950	12.755	JD	4,402	99,038	05/21/2009	06/15/2017
478366-AE-7	JOHNSON CONTROLS INC DEB				2FE	1,118,090	110.2590	1,081,591	1,000,000	1,081,540		(13,181)			7.700	5.847	MS	25,667	77,000	01/23/2007	03/01/2015
478366-AF-4	JOHNSON CONTROLS INC DEBS				2FE	13,418,000	89.6820	13,452,240	15,000,000	13,481,805		7,652			6.950	7.793	JD	86,875	1,042,500	03/14/2001	12/01/2045
485260-BH-5	KANSAS GAS & ELECTRIC				2FE	14,220,984	99.7670	14,138,386	14,171,405	14,212,060		(2,551)			5.647	5.612	MS	204,511	800,259	11/16/2005	03/29/2021
487836-AT-5	KELLOGG COMPANY UNSEC'D DEBS SER B				1FE	15,593,233	121.2410	14,633,789	12,070,000	15,567,376		(25,857)			7.450	5.184	AO	224,804	449,608	09/15/2009	04/01/2031
487836-AZ-1	KELLOGG COMPANY BASIC				1FE	5,116,500	108.5260	5,426,315	5,000,000	5,082,973		(26,024)			5.125	4.512	JD	19,931	256,250	09/05/2008	12/03/2012
487836-BA-5	KELLOGG COMPANY				1FE	5,014,850	104.8310	5,241,525	5,000,000	5,012,074		(2,776)			4.250	4.168	MS	67,882	106,250	03/10/2009	03/06/2013
487836-BB-3	KELLOGG COMPANY				1FE	4,986,800	102.9770	5,148,850	5,000,000	4,987,856		1,056			4.450	4.494	MN	19,160	116,813	05/18/2009	05/30/2016
49306B-NR-0	KEY BANK SR BNK NTS				1FE	3,208,342	93.2000	3,122,190	3,350,000	3,242,133		(17,020)			5.091	5.810	MS	45,006	170,549	12/18/2007	03/26/2015
49337E-AA-8	KEYSPAN GAS EAST UNSEC'D NTS				1FE	13,999,710	100.4820	12,057,804	12,000,000	12,028,448		(332,234)			7.875	4.991	FA	393,750	945,000	06/01/2004	02/01/2010
49337I-AC-4	KEYSPAN CORP GAS SR NOTES				1FE	9,188,750	115.2130	9,447,425	8,200,000	9,107,148		(18,867)			8.000	7.021	MN	83,822	656,000	10/10/2001	11/15/2030
494550-AL-0	KINDER MORGAN ENERGY SR UNSEC'D BONDS				2FE	13,537,732	112.7790	14,086,097	12,490,000	13,436,931		(18,460)			7.750	7.060	MS	285,015	967,975	01/15/2004	03/15/2032
494550-AS-5	KINDER MORGAN ENERGY BASIC				2FE	10,126,900	104.9630	10,496,280	10,000,000	10,071,485		(12,687)			5.125	4.958	MN	65,486	512,500	02/16/2005	11/15/2014
500255-AM-6	KOHL'S CORP UNSEC'D NOTES				2FE	11,141,600	105.1460	10,514,630	10,000,000	10,193,322		(158,476)			6.300	4.572	MS	210,000	630,000	04/09/2003	03/01/2011
500657-AA-9	Invista 144A			1	4FE	648,375	101.5000	614,075	605,000	617,320		(13,088)			9.250	7.585	MN	9,327	55,963	01/25/2006	05/01/2010
50075N-AB-0	KRAFT FOOD INC NTS				2FE	4,354,600	106.2070	4,248,260	4,000,000	4,088,372		(45,419)			5.625	4.586	MN	37,500	225,000	05/22/2003	11/01/2011
50075N-AH-7	KRAFT FOOD INC NTS				2FE	2,592,250	107.7730	2,694,328	2,500,000	2,552,813		(19,997)			6.250	5.306	JD	13,021	156,250	12/18/2007	06/01/2012
501044-BK-6	KROGER CO SR NOTES				2FE	16,844,535	111.8070	18,448,122	16,500,000	16,952,506		(23,121)			7.000	6.552	MN	192,500	1,155,000	04/21/2009	05/01/2018
501044-BT-7	KROGER CO SR UNSEC'D SER B				2FE	5,540,100	117.1610	5,858,070	5,000,000	5,483,924		(11,763)			7.700	6.795	JD	32,083	385,000	06/09/2004	06/01/2029
501044-CA-7	KROGER CO SR UNSEC'D				2FE	5,796,250	106.1890	5,309,445	5,000,000	5,158,555		(121,498)			6.800	4.162	AO	85,000	340,000	03/17/2004	04/01/2011
501044-CG-4	KROGER CO BASIC				2FE	18,352,825	109.2420	20,209,844	18,500,000	18,373,262		(18,576)			6.400	6.508	FA	447,289	912,000	03/31/2009	08/15/2017
501044-CL-3	KROGER CO				2FE	15,409,520	114.1290	15,978,004	14,000,000	15,212,251		(197,269)			7.500	5.100	JJ	484,167	525,000	03/30/2009	01/15/2014
50212A-AB-2	L-1 IDENTITY SOLUTIONS I			1	3FE	330,000	90.1250	330,625	500,000	333,649		3,649			3.750	7.117	MN	2,396	18,750	03/25/2009	05/15/2027
511546-AE-3	LAKE																				

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
539830-AD-1	LOCKHEED MARTIN CORP UNSEC'D DEBS				1FE	7,302,100		118,6130	7,709,871	6,500,000	7,276,181		(11,390)		7.200	6.268	MN	78,000	468,000	07/12/2007	05/01/2036
539830-AF-6	LOCKHEED MARTIN CORP DEBS				1FE	4,975,400		119,1250	5,956,245	5,000,000	4,980,771		570		7.750	7.792	MN	64,583	387,500	05/16/1996	05/01/2026
539830-AR-0	LOCKHEED MARTIN CORP SERIES B				1FE	41,957,754		105,8360	44,442,737	41,992,000	41,963,725		412		6.150	6.155	MS	860,836	2,582,508	12/18/2006	09/01/2036
543859-AH-5	LORAL CORP DEBS				1FE	10,350,950		111,8250	11,182,480	10,000,000	10,000,000		(13,210)		7.000	6.671	MS	206,111	700,000	07/28/2003	09/15/2023
543859-AL-6	LORAL CORP SR DEBS				1FE	2,962,830		119,9790	3,599,367	3,000,000	2,971,344		939		7.625	7.732	JD	10,167	228,750	03/19/1997	06/15/2025
546268-AG-8	LOUISIANA LAND&EXP-BURL RES DEBS				1FE	17,890,227		115,5050	19,053,721	16,496,000	17,543,912		(44,332)		7.650	6.928	JD	105,162	1,261,944	01/14/2004	12/01/2023
54866N-AU-3	LOWES COMPANIES INC MTN				1FE	3,268,599		115,2810	3,861,927	3,350,000	3,293,168		2,364		8.190	8.408	AO	68,591	274,365	06/09/1999	09/12/2022
54866N-AY-5	LOWES COMPANIES INC MTN				2FE	5,000,000		115,3340	5,766,680	5,000,000	5,000,000				8.200	8.202	AO	102,500	410,000	01/05/1993	01/11/2023
549271-AE-4	LUBRIZOL				2FE	18,760,260		106,4510	19,161,234	18,000,000	18,419,577		(76,677)		5.500	4.943	AO	247,500	990,000	02/08/2005	10/01/2014
55259P-AA-4	M&I MARSHALL & ILSLEY BK SUB NTS				2FE	9,495,280		100,3970	8,031,760	8,000,000	8,048,604		(235,957)		7.875	4.790	MS	185,500	630,000	12/11/2002	03/15/2010
55259P-AB-2	M&I MARSHALL & ILSLEY BK NTS				2FE	2,204,140		95,8640	1,917,280	2,000,000	2,050,062		(28,283)		6.375	4.790	MS	42,500	127,500	11/07/2003	09/01/2011
55259P-AC-0	M&I MARSHALL & ILSLEY BK SUB NTS				2FE	13,565,757		88,6370	11,722,256	13,225,000	13,338,249		(39,041)		5.250	4.903	MS	225,652	694,313	01/30/2004	09/04/2012
552676-AM-0	MDC HOLDINGS INC UNSEC'D CO GUARNTY				2FE	7,573,144		107,8140	7,654,822	7,100,000	7,277,560		(54,168)		7.000	6.051	JD	41,417	497,000	08/07/2003	12/01/2012
552676-AN-8	MDC HOLDINGS INC NTS				2FE	17,696,286		100,4700	17,481,728	17,400,000	17,518,979		(31,528)		5.000	5.276	MN	122,283	957,000	12/08/2003	05/15/2013
553758-AL-7	MSX INTERNATIONAL INC SERIES 144A				4FE	1,640,250		70,0000	1,260,000	1,800	1,681,917		33,651		12.500	15.052	AO	56,250	225,000	03/29/2007	04/01/2012
564759-AM-4	MANUFACTURERS & TRADERS TRUST UNSEC'D SUB NTS				1FE	18,506,872		104,6910	16,530,740	15,790,000	16,097,075		(393,563)		8.000	5.305	AO	315,800	1,263,200	12/09/2002	10/01/2010
565849-AA-4	MARATHON OIL CORP SR UNSEC'D NTS				2FE	3,002,732		107,4900	3,063,474	2,850,000	2,894,032		(18,378)		6.125	5.371	MS	51,399	174,563	02/11/2003	03/15/2012
565849-AB-2	MARATHON OIL CORP UNSEC'D SR NTS				2FE	5,201,500		106,0440	5,302,210	5,000,000	5,184,591		(3,654)		6.800	6.484	MS	100,111	340,000	06/16/2004	03/15/2032
565849-AF-3	MARATHON OIL CORP				2FE	9,613,100		105,3340	10,533,350	10,000,000	9,636,725		23,625		5.900	6.478	MS	295,000	295,000	04/21/2009	03/15/2018
565849-AG-1	MARATHON OIL CORP				2FE	11,069,136		110,6160	12,087,054	10,927,000	11,050,110		(19,026)		6.500	6.186	FA	268,319	351,182	03/27/2009	02/15/2014
565849-AH-9	MARATHON OIL CORP				2FE	35,393,596		115,4120	40,220,977	34,850,000	35,362,312		(31,283)		7.500	7.277	FA	987,417	1,292,354	04/03/2009	02/15/2019
570506-AH-8	MARKWEST ENERGY PART/FIN Series B				4FE	977,152		103,0000	1,014,550	985,000	978,042		550		8.750	8.872	AO	18,195	86,188	09/03/2008	04/15/2018
571903-AH-8	MARRIOTT INTERNATIONAL				2FE	9,950,100		102,5740	10,257,410	10,000,000	9,959,693		4,099		6.375	6.444	JD	28,333	637,500	06/20/2007	06/15/2017
571903-AH-6	MARRIOTT INTERNATIONAL BASIC				2FE	1,032,405		102,6110	1,128,724	1,100,000	1,051,721		13,343		5.625	7.221	FA	23,375	61,875	07/09/2008	02/15/2013
574599-AX-4	MASCO CORP NTS				3FE	7,557,690		102,1530	7,150,696	7,000,000	7,187,791		(68,083)		5.875	4.740	JJ	189,632	411,250	11/18/2003	07/15/2012
574754-AB-3	144A TAXABLE				1FE	1,979,817		71,0580	1,858,167	2,615,000	2,011,143		11,198	753,282	6.570	5.299	MS	57,269	171,806	01/23/2004	09/01/2013
574754-AE-7	MASHANTUCKET WSTRN POT TRIBE Series 144A				6FE	1,216,425		24,5000	1,216,425	4,965,000	1,216,425		54,739	3,593,358	05.700	2.820	MN	352,099	352,099	05/13/2008	11/15/2015
576323-AF-6	MASTEC INC				4FE	1,584,086		96,1250	1,576,450	1,640,000	1,592,031		4,484		7.625	8.157	FA	52,104	125,050	02/28/2008	02/01/2017
577778-AT-0	MAY DEPT STORES CO DEB				3FE	528,430		97,0140	462,999	477,250	510,236		(2,074)		9.500	7.890	AO	9,572	45,339	08/08/2000	04/15/2021
579489-AA-3	MCCLATCHY CO 144A				6FE	1,256,120		75,0000	2,511,000	3,348,000	1,320,234		64,114		15.750	51.293	JJ	270,979	270,979	06/26/2009	07/15/2014
58013M-DM-3	MCDONALD'S CORP NOTES				1FE	1,742,532		105,9650	1,748,424	1,650,000	1,669,932		(14,666)		6.000	5.017	AO	20,900	99,000	06/16/2004	04/15/2011
58013M-DR-2	MCDONALD'S CORP BASIC				1FE	4,727,070		107,7960	4,850,802	4,500,000	4,645,893		(63,175)		5.750	4.166	MS	86,250	258,750	09/12/2008	03/01/2012
58013M-EE-0	MCDONALD'S CORP MTN				1FE	9,999,200		107,2220	10,722,190	10,000,000	9,999,334		64		5.350	5.351	MS	178,333	535,000	02/26/2008	03/01/2018
58013M-EG-5	MCDONALD'S CORP MTN				1FE	4,998,300		104,5200	5,226,010	5,000,000	4,998,554		254		5.000	5.004	FA	104,167	135,417	01/13/2009	02/01/2019
581557-AV-7	MCKESSON CORP				2FE	9,983,500		104,8880	10,488,820	10,000,000	9,987,204		1,410		5.700	5.722	MS	190,000	570,000	02/28/2007	03/01/2017
581557-AW-5	MCKESSON CORP				2FE	2,067,440		110,6160	2,212,328	2,000,000	2,057,288		(10,152)		6.500	5.710	FA	49,111	66,083	02/23/2009	02/15/2014
581557-AX-3	MCKESSON CORP				2FE	11,679,291		118,5880	13,430,125	11,325,000	11,658,219		(21,072)		7.500	7.053	FA	320,875	431,766	02/25/2009	02/15/2019
581550-AA-1	MCKESSON CORP NTS				2FE	32,319,827		110,2340	30,810,291	27,950,000	29,372,621		(631,413)		7.750	5.142	FA	902,552	2,166,125	01/31/2005	02/01/2012
585055-AJ-5	MEDTRONIC INC 144A				1FE	1,817,134		101,5000	1,827,000	1,800,000	1,811,619		(9,345)		1.500	0.986	AO	5,700	27,000	07/21/2008	04/15/2011
585055-AL-0	MEDTRONIC INC				1FE	2,596,178		101,5000	2,537,500	2,500,000	2,539,257		(30,826)		1.500	0.271	AO	7,917	37,500	07/21/2008	04/15/2011
585515-AB-5	MELLON FUNDING CORP UNSEC'D NTS				1FE	10,229,700		106,1290	10,612,880	10,000,000	10,041,339		(28,191)		6.400	6.080	MN	83,556	640,000	09/25/2001	05/14/2011
585515-AD-1	MELLON FUNDING CORP NTS				1FE	2,937,960		106,5340	3,196,032	3,000,000	2,953,881		8,005		5.000	5.360	JD	12,500	150,000	12/18/2007	12/01/2014
589331-AC-1	MERCK AND CO., INC. UNSEC'D DEBS				1FE	1,049,850		108,8800	1,088,797	1,000,000	1,041,558		(1,531)		6.300	5.895	JJ	31,500	63,000	08/21/2003	01/01/2026
589331-AD-9	MERCK AND CO., INC. DEBS				1FE	1,318,607		110,3250	1,305,140	1,183,000	1,299,857		(3,684)		6.400	5.531	MS	25,237	75,712	03/03/2004	03/01/2028
589331-AE-7	MERCK AND CO., INC. DEBS				1FE	2,694,051		105,3820	2,676,710	2,540,000	2,673,961		(3,952)		5.950	5.498	JD	12,594	151,130	02/24/2004	12/01/2028
59018Y-RZ-6	MERRILL LYNCH & CO NTS SER B				1FE	4,985,900		101,8270	5,091,345	5,000,000	4,992,174		1,137		5.300	5.332	MS	66,986	265,000	09/23/2003	09/30/2015
59022C-AB-9	MERRILL LYNCH & CO BASIC				1FE	10,598,300		95,5950	9,559,470	10,000,000	10,544,297		(19,094)		6.220	5.710	MS	183,144	622,000	12/07/2006	09/15/

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
601073-AD-1	MILLIPORE CORP BASIC			1	3FE	4,305,137	.103.1250	4,563,281	4,425,000	4,294,715		(4,868)			3.750	3.437	JD	13,828	134,063	12/09/2009	12/01/2011
607059-AT-9	MOBIL CORP DEBENTURES				1FE	5,030,350	.133.3990	6,669,930	5,000,000	5,021,807		(1,063)			8.625	8.565	FA	162,917	431,250	10/05/1994	08/15/2021
608190-AF-1	MOHAWK INDUSTRIES, INC NTS SER D				3FE	4,527,520	.105.0000	4,200,000	4,000,000	4,166,718		(67,015)			7.200	5.240	AO	60,800	288,000	11/12/2003	04/15/2012
616880-BJ-8	J P MORGAN & CO INC UNSEC'D SUB NTS				1FE	2,596,488	.104.4160	2,505,989	2,400,000	2,434,984		(29,641)			6.250	4.898	FA	56,667	150,000	10/30/2003	02/15/2011
617446-HD-4	MORGAN STANLEY NOTES				1FE	2,210,980	.113.7510	2,275,010	2,000,000	2,190,640		(3,783)			7.250	6.438	AO	36,250	145,000	07/29/2003	04/01/2032
61744A-AN-0	MORGAN STANLEY NOTES				1FE	2,486,325	.101.2290	2,530,720	2,500,000	2,499,175		2,169			4.250	4.341	MN	13,576	106,250	04/30/2003	05/15/2010
61748A-AE-6	MORGAN STANLEY SUB NTS				1FE	7,930,320	.100.5750	8,045,976	8,000,000	7,966,311		6,984			4.750	4.861	AO	95,000	380,000	03/23/2004	04/01/2014
624758-AB-4	MUELLER WATER PRODUCTS BASIC			1	5FE	2,189,613	.92.5000	2,289,375	2,475,000	2,226,175		22,482			7.375	9.280	JD	15,211	182,531	06/04/2008	06/01/2017
62546R-AA-9	MULTIPLAN INC 144A				1FE	910,000	.97.5000	887,250	910,000	910,000					10.375	10.375	AO	19,932	94,413	04/07/2006	04/15/2016
628931-AB-3	NBD BANK NA MICHIGAN SUB DEBS				1FE	5,430,660	.115.0110	4,600,456	4,000,000	5,149,507		(49,515)			8.250	5.408	MN	55,000	330,000	06/24/2003	11/01/2024
62940Q-AA-3	NSG HOLDINGS LLC/NSG SERIES 144A				3FE	19,952,000	.89.5000	17,707,575	19,785,000	19,938,390		(4,915)			7.750	7.664	JD	68,148	1,533,338	12/10/2007	12/15/2025
629527-AU-6	NABISCO INC DEBS				2FE	4,211,780	.114.9330	4,022,655	3,500,000	3,861,204		(56,328)			7.550	5.330	JD	11,744	264,250	10/04/2002	06/15/2015
635405-AM-5	NATIONAL CITY CORP SUB NOTES				1FE	4,465,189	.105.8500	5,059,635	4,780,000	4,576,250		14,547			6.875	7.517	MN	41,991	328,625	07/01/1999	05/15/2019
63618E-AM-3	NATL FUEL GAS CO MTN				2FE	4,879,850	.107.0260	5,351,295	5,000,000	4,916,057		3,601			7.395	7.589	MN	61,625	369,750	06/16/1993	03/30/2023
637432-DA-0	NATL RURAL UTIL CO-OP COLL. TRUST				1FE	6,949,600	.102.6680	7,186,746	7,000,000	6,993,857		7,923			4.375	4.496	AO	76,563	306,250	09/23/2003	10/01/2010
641423-BK-3	NEVADA POWER CO BASIC				2FE	807,964	.107.3150	858,518	800,000	804,860		(811)			5.875	5.734	JJ	21,672	47,000	09/16/2005	01/15/2015
648053-AC-0	NEW PLAN EXCEL REALTY TRUST NOTES				5FE	8,043,800	.85.0000	6,800,000	8,000,000	8,007,744		(6,875)			4.500	4.407	FA	150,000	360,000	03/10/2004	02/01/2011
650094-CB-9	NY TEL CO DEBENTURES				1FE	18,784,900	.99.4260	19,885,140	20,000,000	18,928,553		14,950			7.000	7.480	JD	116,667	1,400,000	06/23/1994	12/01/2033
651229-AE-6	RUBBERMAID INC NTS				2FE	282,012	.100.7400	285,094	283,000	282,947		157			4.000	4.058	MN	1,887	11,320	05/01/2003	05/01/2010
651639-AH-9	NEWMONT MINING CORP				2FE	957,657	.124.7500	1,528,188	1,225,000	1,003,744		40,410			1.250	5.755	JJ	7,061	15,313	11/17/2008	07/15/2014
652478-AH-1	NEWS AMERICA HOLDINGS SR DEB				2FE	11,726,400	.116.6750	11,667,450	10,000,000	10,512,107		(143,046)			9.250	7.363	FA	385,417	925,000	07/31/1997	02/01/2013
652478-AU-2	NEWS AMERICA HOLDINGS NTS				2FE	1,998,465	.102.7810	1,798,669	1,750,000	1,954,075		(8,683)			7.750	6.475	FA	56,510	135,625	02/24/2004	02/01/2024
652478-BA-5	NEWS AMERICA HOLDINGS SR UNSEC'D DEBS				2FE	7,621,556	.111.6280	9,320,930	8,350,000	7,640,826		2,603			7.750	8.506	JD	53,927	647,125	06/02/2000	12/01/2045
652478-BZ-0	NEWS AMERICA HOLDINGS BONDS				2FE	10,290,410	.101.9560	10,705,338	10,500,000	10,290,580		12			8.250	8.418	AO	178,063	866,250	03/08/2001	10/17/2096
652482-AM-2	NEWS AMERICA INC DEBS				2FE	1,044,780	.113.8000	1,137,999	1,000,000	1,026,652		(2,293)			7.250	6.827	MN	8,660	72,500	02/17/1999	05/18/2018
65338L-AA-7	NCO Group			1	5FE	3,800,000	.76.6250	2,911,750	3,800,000	3,800,000					11.875	11.875	MN	57,660	451,250	08/20/2007	11/15/2014
653522-DQ-2	NIAGARA MOHAWK PIIR CORP 144A				1FE	2,000,000	.99.6940	1,993,878	2,000,000	2,000,000					3.553	3.553	AO	18,357		09/21/2009	10/01/2014
65463P-AH-0	NIPSCO CAP MKTS INC MTN				2FE	5,001,504	.105.0720	5,227,312	4,975,000	4,995,860		(969)			7.990	7.936	MS	117,042	397,503	05/18/2001	04/01/2022
65473Q-AR-4	NISOURCE FINANCE CORP				2FE	11,121,570	.96.9700	11,878,837	12,250,000	11,319,632		58,874			5.450	6.443	MS	196,578	667,625	05/16/2006	09/15/2020
65543A-AB-0	NORANDA ALUMINUM ACO			1	2FE	1,339,633	.77.6250	1,841,610	2,372,445	1,364,200		31,660	799,484		5.274	7.048	MN	16,048	152,445	11/15/2009	05/15/2015
655664-AH-3	NORDSTROM INC UNSEC'D SR DEBS				2FE	22,787,262	.108.7890	23,015,443	21,156,000	22,574,098		(40,811)			6.950	6.324	MS	432,934	1,470,342	06/22/2004	03/15/2028
655844-AJ-7	NORFOLK SOUTHERN CORP BONDS				2FE	822,686	.120.2100	934,031	777,000	817,629		(1,148)			7.800	7.287	MN	7,744	60,606	08/20/2003	05/15/2027
655844-AK-4	NORFOLK SOUTHERN CORP BONDS				2FE	29,660,872	.114.6060	33,132,566	28,910,000	29,660,833		(5)			7.900	7.700	MN	291,830	2,283,890	08/08/2003	05/15/2097
655844-AX-6	NORFOLK SOUTHERN CORP BASIC				2FE	17,471,795	.96.8180	19,579,545	20,223,000	17,722,640		60,981			5.640	6.797	MN	139,404	1,140,577	05/17/2005	05/17/2029
655855-FA-7	NORFOLK SOUTHERN RAILWAY				2FE	3,240,811	.133.0080	3,471,498	2,610,000	3,098,493		(30,676)			9.750	7.170	JD	11,310	254,475	08/24/2004	06/15/2020
655855-FB-5	NORFOLK SOUTHERN RAILWAY				2FE	19,394,093	.119.5650	22,884,645	19,140,000	19,383,667		(1,526)			7.875	7.768	MN	192,596	1,507,275	08/24/2004	05/15/2043
659421-AD-3	NORTH FORK BANKCORP INC NTS				2FE	5,321,700	.103.7640	5,188,185	5,000,000	5,110,545		(38,568)			5.875	4.965	FA	110,972	293,750	10/10/2003	08/15/2012
665228-CA-8	NORTHERN ILLINOIS GAS FMB				1FE	696,626	.100.6190	704,331	700,000	697,291		123			5.800	5.841	JD	3,383	40,600	12/04/2003	12/01/2023
666807-AP-7	NORTHROP-GRUMMAN CORP DEBS				2FE	5,789,160	.118.2150	7,092,876	6,000,000	5,893,280		12,875			7.750	8.122	MS	155,000	465,000	06/06/2000	03/01/2016
666807-AQ-5	NORTHROP-GRUMMAN CORP DEBS				2FE	27,103,000	.121.0650	30,266,250	25,000,000	26,670,197		(54,552)			7.875	7.167	MS	656,250	1,968,750	12/16/1998	03/01/2026
666807-AT-9	NORTHROP-GRUMMAN CORP NTS				2FE	28,382,200	.105.8580	26,093,923	24,650,000	25,455,117		(639,755)			7.125	4.114	FA	663,496	1,578,188	04/01/2009	02/15/2011
666807-BA-9	NORTHROP-GRUMMAN CORP				2FE	10,482,700	.102.1160	10,211,570	10,000,000	10,481,058		(1,642)			5.050	4.428	FA	211,819		12/10/2009	08/01/2019
667748-AF-4	NORTHWEST PIPELINE CORP DEBS				2FE	3,984,000	.104.2000	4,167,988	4,000,000	4,167,696		405			7.125	7.158	JD	23,750	285,000	11/30/1995	12/01/2025
667748-AM-9	NORTHWEST PIPELINE CORP				2FE	511,250	.112.5990	562,995	500,000	508,303		(1,000)			7.000	6.679	JD	1,556	35,000	10/10/2006	06/15/2016
67019E-AA-5	NSTAR UNSEC'D NTS				1FE	3,575,880	.100.7970	3,023,898	3,000,000	3,012,740		(102,499)			8.000	4.450	FA	90,667	240,000	11/06/2003	02/15/2010
67019E-AB-3	NSTAR				1FE	4,958,350	.97.7910	4,889,535	5,000,000	4,958,760		410			4.500	4.605	MN	27,500		11/12/2009	11/15/2019
67021C-AA-5	NSTAR ELECTRIC CO NTS				1FE	1,985,940	.106.7830	2,135,664	2,000,000	1,995,371		1,514			4.875	4.965	AO	20,583	97,500	10/09/2002	10/15/2012
67021C-AD-9	NSTAR ELECTRIC CO DEBS				1FE	7,309,077	.102.1670	6,232,187	6,100,000												

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest				Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
681904-AL-2	OMNICARE INC BASIC			1	4FE	1,280,570	.813750	1,533,919	1,885,000	1,292,397		9,365			3.250	5.548	JD	2,723	57,200	07/23/2009	12/15/2035
68233D-AR-8	ONCOR ELECTRIC DELIVERY NTS REG				2FE	25,529,900	.111850	27,796,225	25,000,000	25,412,868	(20,334)				7.000	6.802	MS	583,333	1,750,000	04/04/2003	09/01/2022
68233D-AT-4	ONCOR ELECTRIC DELIVERY SR SEC NTS REG				2FE	16,584,414	.1106090	16,547,166	14,960,000	16,416,298	(29,840)				7.000	6.189	MN	174,533	1,047,200	01/15/2004	05/01/2022
684181-AA-8	ORANGE COGEN. FUND CORP SR SEC 144A			2	2FE	3,380,000	.1022130	3,454,799	3,380,000	3,380,000					8.175	8.259	INJSD	12,281	276,315	03/21/1997	03/15/2022
69320D-AA-7	PC FINANCIAL PARTNERSHIP BASIC				2FE	10,980,750	.1048530	11,533,775	11,000,000	10,989,654		1,833			5.000	5.022	MN	70,278	550,000	02/24/2005	11/15/2014
693304-AG-2	PECO ENERGY CO FMB				1FE	964,050	.1014030	1,014,029	1,000,000	966,953		576			5.900	6.164	MN	9,833	59,000	06/28/2004	05/01/2034
693304-AL-1	PECO ENERGY CO				1FE	9,219,015	.1050930	8,932,931	8,500,000	9,212,669	(6,346)				5.350	4.129	MS	151,583		11/23/2009	03/01/2018
693320-AJ-2	PHH CORP BASIC				3FE	142,346	.942500	141,375	150,000	142,346					4.000	5.250	MS	1,617		12/31/2009	09/01/2014
69349H-AB-3	PNM RESOURCES INC BASIC				3FE	1,757,875	.1051250	1,844,944	1,755,000	1,757,655	(220)				9.250	9.214	MN	20,743	162,338	09/17/2008	05/15/2015
693506-AG-0	PPG INDUSTRIES DEBS				2FE	4,873,350	.1197110	5,985,535	5,000,000	4,913,121		4,207			9.000	9.251	MN	75,000	450,000	05/14/1991	05/01/2021
693506-AW-7	PPG INDUSTRIES NTS				2FE	4,672,800	.1066540	5,332,710	5,000,000	4,794,698		18,621			6.875	7.580	MN	57,292	343,750	07/19/2001	11/01/2017
693506-BA-4	PPG INDUSTRIES				2FE	20,282,152	.1067690	21,500,053	20,137,000	20,253,998	(28,153)				5.750	5.549	MS	340,931	1,157,878	03/03/2009	03/15/2013
693506-BB-2	PPG INDUSTRIES				2FE	35,118,062	.1088550	37,707,303	34,640,000	35,089,866	(28,196)				6.650	6.443	MS	678,270	2,137,310	06/04/2009	03/15/2018
693627-AJ-0	PSI ENERGY INC FMB				1FE	5,563,400	.1247240	6,236,195	5,000,000	5,425,488					8.850	7.750	JJ	204,042	442,500	03/05/2001	01/15/2022
693627-AK-7	PSI ENERGY INC				1FE	5,964,013	.1100160	6,600,954	6,000,000	5,966,684		484			8.310	8.365	MS	166,200	498,600	05/03/1999	09/01/2032
69363F-BD-3	PSI ENERGY INC SEC MTN				1FE	4,994,640	.1003040	5,015,205	5,000,000	4,996,206		172			8.240	8.250	FA	155,644	412,000	08/20/1992	08/22/2022
693659-AC-8	PVINGS II FNDG CORP SLOB			2	2FE	6,179,362	.1078160	6,691,061	6,206,000	6,193,750		1,537			8.000	8.042	JD	1,379	487,637	04/16/1993	12/30/2015
693927-AC-9	PMPF FUNDING CORP CLB			2	2FE	3,490,000	.1113260	3,885,277	3,490,000	3,490,000					9.120	9.120	MN	27,408	318,288	11/14/1991	05/30/2016
694032-AT-0	PACIFIC BELL DEBENTURES				1FE	28,136,315	.1089150	31,040,747	28,500,000	28,217,964		8,119			7.125	7.227	MS	597,906	2,030,625	10/20/1993	03/15/2026
694032-AV-5	PACIFIC BELL DEBS			1	1FE	15,659,538	.998980	17,292,275	17,310,000	15,725,597		8,796			7.375	8.177	JJ	588,660	1,276,613	06/07/2000	07/15/2043
694032-AX-1	PACIFIC BELL DEBS			1	1FE	12,073,600	.990850	13,871,858	14,000,000	12,281,409		21,842			6.625	7.741	AO	195,806	927,500	07/08/1994	10/15/2034
694308-GC-5	PACIFIC GAS & ELEC FMB				1FE	1,994,800	.1031930	2,063,854	2,000,000	1,999,012		813			4.200	4.244	MS	28,000	84,000	03/18/2004	03/01/2011
694308-GE-1	PACIFIC GAS & ELEC FMB				1FE	7,652,310	.1044030	8,352,272	8,000,000	7,678,290		5,368			6.050	6.377	MS	161,333	484,000	06/23/2004	03/01/2034
695114-BT-4	PACIFICORP 1ST MTG SEC'D				1FE	18,388,860	.1249370	22,488,624	18,000,000	18,347,855	(6,653)				7.700	7.516	MN	177,100	1,386,000	04/18/2002	11/15/2031
695114-BY-3	PACIFICORP BASIC				1FE	6,974,520	.1065870	7,461,111	7,000,000	6,986,582		2,522			4.950	4.997	FA	130,900	346,500	08/19/2004	08/15/2014
69512E-FF-7	PACIFICORP SEC MTN				1FE	5,000,000	.1236440	6,182,210	5,000,000	5,000,000					8.230	8.231	MS	137,167	411,500	01/20/1993	01/20/2023
69512E-FF-5	PACIFICORP SEC MTN				1FE	4,063,320	.1236440	4,945,768	4,000,000	4,044,828		(1,860)			8.230	8.090	MS	109,733	329,200	01/29/1993	01/20/2023
69563A-GD-7	PAINE WEBBER GROUP SR NTS SER C				1FE	2,062,678	.1078710	1,833,799	1,700,000	1,700,000					7.810	5.467	MS	44,257	132,770	04/28/2004	02/13/2017
69563A-HT-1	PAINE WEBBER GROUP SR NTS SER C				1FE	1,606,731	.1021310	1,388,980	1,360,000	1,524,135		(16,500)			7.390	5.467	MS	33,501	100,504	04/28/2004	10/16/2017
696970-00-3	Old National Bank Private Placement				2	21,190,135	.977330	20,709,755	21,190,135	21,190,135					6.640	6.733	MON	39,084	1,407,947	06/28/2007	09/19/2027
697933-AM-1	PANAMSAT CORP DEBS				4FE	7,895,649	.855000	7,182,000	8,400,000	7,951,166		10,900			6.875	7.408	JJ	266,292	577,500	08/30/2004	01/15/2028
698604-AG-0	PANOLAM INDUSTRIES INTL BASIC			1	6*	22,500	.322500	161,250	500,000	22,500		3,350	382,844		10.750	16.462	AO			11/23/2007	10/01/2013
700677-AK-3	PARK-OHIO INDUSTRIES				5FE	480,200	.767500	752,150	980,000	495,867		18,374	461,025		8.375	7.647	MN	10,487	82,075	08/02/2005	11/15/2014
705322-AD-7	PEDERNALES ELEC CO-OP SR SUB 93-A MTG 144A (AMBAC)			2	1FE	20,000,000	.1148950	22,979,000	20,000,000	20,000,000					8.550	8.552	MN	218,500	1,710,000	01/21/1993	11/15/2020
705322-AJ-4	PEDERNALES ELEC CO-OP FMB SER 02-A 144A (MBIA)			2	1FE	15,000,000	.1004830	15,072,450	15,000,000	15,000,000					5.952	5.951	MN	114,080	892,800	10/10/2002	11/15/2022
707882-AA-4	PENN VIRGINIA CORP				4	1,145,302	.947500	1,160,688	1,225,000	1,147,225		1,923			4.500	6.978	MN	7,194	2,250	12/30/2009	11/15/2012
708160-BL-9	J C PENNEY CO INC BND				3FE	3,000,000	.900000	2,700,000	3,000,000	3,000,000					7.625	7.625	MS	76,250	228,750	02/20/1997	03/01/2097
711030-AC-0	PEOPLES ENERGY CORP NTS				2FE	3,388,850	.1045840	3,137,511	3,000,000	3,065,543		(60,243)			6.900	4.718	JJ	95,450	207,000	01/13/2004	01/15/2011
713291-AG-7	PEPCO HOLDINGS INC BASIC				2FE	14,858,505	.1073270	14,489,145	13,500,000	14,015,625		(180,169)			6.450	4.880	FA	328,950	870,750	10/27/2004	08/15/2012
713291-AH-5	PEPCO HOLDINGS INC BASIC				2FE	11,661,300	.1057540	10,575,440	10,000,000	11,521,544		(30,284)			7.450	6.191	FA	281,444	745,000	09/21/2004	08/15/2032
71343P-AB-7	PEPSIAMERICAS INC BASIC				1FE	29,754,600	.1045940	31,378,290	30,000,000	29,832,094		18,359			5.000	5.092	MN	191,667	1,500,000	05/11/2005	05/15/2017
71343P-AC-5	PEPSIAMERICAS INC BASIC				1FE	9,628,326	.980670	10,370,585	10,575,000	9,663,561		14,618			5.500	6.177	MN	74,319	581,625	07/18/2007	05/15/2035
713448-BJ-6	PEPSICO INC BASIC				1FE	12,545,897	.1227260	14,311,021	11,661,000	12,474,008		(65,736)			7.900	6.826	MN	153,537	939,132	11/21/2008	11/01/2018
716495-AH-9	PETROHAWK ENERGY CORP			1	4FE	340,900	.1092500	404,225	370,000	341,870		970			10.500	12.737	FA	16,188		10/22/2009	08/01/2014
716747-AA-8	PETROPOWER I FUNDING TRUST NT 144A			1	2FE	174,546	.995290	173,724	174,546	174,546					7.360	7.360	FA	4,853	12,847	02/09/1996	02/15/2014
71674P-AB-6	PETROQUEST ENERGY INC			1	5FE	1,087,120	.1000000	1,100,000	1,100,000	1,094,512		1,943			10.375	10.619	MN	14,583	114,125	09/23/2005	05/15/2012
717081-DB-6	PFIZER INC				1FE	14,984,850	.1111620	16,674,330	15,000,000	14,985,414		564			6.200	6.214	MS	273,833	441,750	03/17/2009	03/15/2019
71713U-AW-2	PHARMACIA CORPORATION DEBS				1FE	5,011,023	.1095910	4,811,036	4,390,000	4,929,547		(15,838)			6.600	5.543	JD				

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
723787-AF-4	PIONEER NATURAL RESOURCES				3FE	3,996,120		98,9420	4,000,000	3,996,993		260			6.875	6.887	MN	45,833	275,000	04/26/2006	05/01/2018
727610-AE-7	PLASTIPAK HOLDINGS INC 144A			1	4FE	469,147		110.2500	480,000	480,000		305			10.625	11.000	FA	21,675		07/23/2009	08/15/2019
730857-AA-7	POKAGON GAMING 144A			1	4FE	931,000		104.0000	931,000	931,000					10.375	10.375	JD	4,293	96,591	06/15/2006	06/15/2014
73651H-AV-3	PORTLAND GEN ELEC CO SEC MTN				1FE	5,000,000		119.9290	5,000,000	5,000,000					9.310	9.313	AO	98,272	465,500	08/12/1991	08/11/2021
73763H-AS-5	POTLATCH CORP MTN				3FE	5,000,000		104.7480	5,000,000	5,000,000					8.800	8.802	JD	36,667	440,000	01/27/1992	02/01/2016
73763H-AW-6	POTLATCH CORP MTN				3FE	5,000,000		101.3820	5,000,000	5,000,000					8.875	8.877	JD	36,979	443,750	02/04/1992	02/05/2018
73932L-AL-1	POWER RECEIVABLES FINANC SR NTS 144A			2	2FE	2,841,710		101.9490	2,872,460	2,824,023		(3,144)			6.290	6.101	JAJO	44,306	177,224	06/15/2004	01/01/2012
742718-DL-0	PROCTOR & GAMBLE CO BASIC				1FE	6,998,460		106.4780	7,453,432	6,998,998		538			4.600	4.604	JJ	148,478	185,150	12/15/2008	01/15/2014
742741-AA-9	PROCTER & GAMBLE ESOP DEB			2	1FE	35,114,614		121.9490	36,419,108	29,864,212		(337,650)			9.360	6.567	JJ	1,397,645	2,795,290	11/24/2008	08/01/2020
743263-AD-7	PROGRESS ENERGY INC SR UNSEC'D NTS				2FE	5,320,327		105.8420	4,969,301	4,822,563		(104,458)			7.100	4.670	MS	111,115	333,345	09/29/2004	03/01/2011
743263-AE-5	PROGRESS ENERGY INC BASIC				2FE	23,897,000		117.5760	23,515,280	20,000,000		(78,858)			7.750	6.236	MS	516,667	1,550,000	09/17/2004	03/01/2031
743410-AE-2	PROLOGIS TRUST NTS				2FE	4,990,050		98.9260	4,996,300	5,000,000		1,048			5.500	5.526	MS	287,500	287,500	02/19/2003	03/01/2013
744331-AF-6	PRUDENTIAL FNDG CORP NOTES 144A				1FE	22,682,565		95.1920	25,225,748	26,500,000		107,861			6.750	8.055	MS	526,688	1,788,750	04/16/2001	09/15/2023
74438Y-AA-0	PRUVIENT ENERGY GUAM LLC TAX MUNI (144A)			2	3	2,438,888		99.5710	2,434,511	2,445,000		696			5.450	5.511	MS	133,253	133,253	04/09/2003	09/01/2011
744516-AA-3	PUB SVC OF NORTH CAROLINA SR DEBS				1FE	10,000,000		107.5160	10,751,620	10,000,000					6.990	6.990	JJ	322,317	699,000	01/16/1996	01/15/2026
74451P-AA-1	PUB SERV NC INC NOTES				1FE	4,593,160		104.6500	4,186,004	4,000,000		(4,106,325)			6.625	4.174	FA	100,111	265,000	01/23/2004	02/15/2011
744567-CN-6	PUB SVC ELEC & GAS FRMBS				1FE	10,165,750		130.5170	13,051,690	10,000,000		(5,605)			9.250	9.087	JD	77,083	925,000	10/22/1991	06/01/2021
744567-EA-2	PUB SVC ELEC & GAS FRMBS (MBIA)				1FE	8,003,946		130.5170	9,958,439	7,890,816		(12,896)			9.250	8.770	JD	58,815	705,775	10/25/1994	06/01/2021
74531E-AA-0	PUGET SOUND ENERGY SR NOTES MTN SER A				2FE	11,052,500		110.7420	12,181,642	11,000,000		(1,225)			7.020	6.980	MS	227,370	772,200	09/18/2002	12/01/2027
74531E-AB-8	PUGET SOUND ENERGY FMB SER A				2FE	5,018,000		110.1250	5,506,230	5,000,000		(983)			6.740	6.703	MS	99,228	337,000	09/16/2002	06/15/2018
74837R-AC-8	QUICKSILVER RESOURCES IN			1	4FE	1,877,350		93.2500	1,832,363	1,965,000		8,224			7.125	7.856	AO	35,002	140,006	09/09/2008	04/01/2016
74913G-AW-5	QUIEST CORP 144A				2FE	930,319		107.2500	1,072,500	1,000,000		930,650			8.375	9.870	MN	13,958		12/18/2009	05/01/2016
74955D-AA-9	AEP GENERATING CO RGS FUNDING			2	2FE	26,020,145		117.3180	30,975,321	26,402,872		26,114,404			9.810	9.961	JD	172,675	2,590,122	08/28/1990	12/07/2022
74955D-AB-7	AEP GENERATING CO			2	2FE	2,749,371		117.3250	3,336,574	2,843,873		2,773,143			9.820	10.170	JD	18,618	279,268	09/05/1990	12/07/2022
74955E-AA-7	INDIANA-MICHIGAN PIWR CO RGS FUNDING			2	2FE	8,314,644		117.3180	9,935,480	8,468,845		8,353,011			9.810	10.000	JD	55,386	830,794	08/28/1990	12/07/2022
74955E-AB-5	INDIANA-MICHIGAN PIWR CO RGS FUNDING			2	2FE	7,069,209		117.3250	8,146,793	6,943,783		7,037,148			9.820	9.636	JD	45,459	681,879	06/27/1991	12/07/2022
75102B-AA-9	RALCORP HOLDINGS CORP 144A			1	2	13,748,700		108.5730	15,200,220	14,000,000		13,763,765			7.290	7.560	FA	385,560	510,300	04/28/2009	08/15/2018
75102B-DA-5	RALCORP HOLDINGS PRIVATE PLACEMENT				2	10,650,000		113.8090	12,120,659	10,650,000					7.450	7.450	MN	72,731	396,713	04/23/2009	05/28/2019
751277-AS-3	RALSTON PURINA DEBS				1FE	23,149,683		116.8590	23,371,840	20,000,000		22,709,618			7.875	6.555	JD	70,000	1,575,000	10/15/2001	06/15/2025
755111-AU-5	RAYTHEON DEBS				1FE	1,079,770		113.6640	1,136,642	1,000,000		1,068,423			6.400	5.425	JD	2,844	64,000	12/21/2007	12/15/2018
756109-AE-4	REALTY INCOME CORP NTS				2FE	4,975,450		98.4220	4,921,085	5,000,000		4,990,719			5.375	5.439	MS	79,132	268,750	03/05/2003	03/15/2013
758202-AB-1	REED ELSEVIER CAPITAL				2FE	14,289,825		107.1870	14,470,178	13,500,000		13,754,610			6.750	5.490	FA	379,688	911,250	02/21/2006	08/01/2011
758202-AF-2	REED ELSEVIER CAPITAL				2FE	29,923,200		113.8530	34,155,750	30,000,000		29,935,663			7.750	7.813	JJ	1,072,083	1,156,042	01/13/2009	01/15/2014
758200-AC-6	REED ELSEVIER CAPITAL				2FE	10,980,400		98.0820	9,808,200	10,000,000		(32,083)			7.500	6.588	MN	95,833	750,000	05/08/2006	05/15/2025
75884R-AF-0	REGENCY CENTERS LP UNSEC'D NTS				2FE	1,746,150		102.6580	1,539,876	1,500,000		(43,933)			8.450	5.297	MS	42,250	126,750	06/23/2004	09/01/2010
75884R-AH-6	REGENCY CENTERS LP UNSEC'D NTS				2FE	2,398,020		104.0980	2,081,964	2,000,000		(62,007)			7.950	4.588	JJ	73,317	159,000	01/14/2004	01/15/2011
758940-AF-7	REGIONS FINANCIAL UNSEC'D SUB NTS				2FE	5,914,842		98.5110	5,093,008	5,170,000		5,291,689			7.000	4.891	MS	120,633	361,900	09/25/2002	03/01/2011
758940-AG-5	REGIONS FINANCIAL NTS				2FE	10,473,225		95.2400	10,000,158	10,500,000		3,013			6.375	6.410	MN	669,375	669,375	05/09/2002	05/15/2012
760759-AC-4	REPUBLIC SERVICES UNSEC'D SR NTS				2FE	6,194,706		105.4900	5,891,628	5,585,000		5,732,813			6.750	5.030	FA	142,418	376,888	07/20/2004	08/15/2011
771196-AG-5	ROCHE HLDGS INC 144A				1FE	42,290,724		106.9840	45,575,056	42,600,000		42,338,394			5.000	5.166	MS	710,000	1,100,500	02/18/2009	03/01/2014
771196-AS-1	ROCHE HLDGS INC 144A				1FE	37,993,208		109.8850	42,415,649	38,600,000		38,032,314			6.000	6.213	MS	772,000	1,196,600	02/18/2009	03/01/2019
773903-AC-3	ROCKWELL INTL CORP DEB				1FE	10,140,862		74.9880	12,474,204	16,635,000		10,145,099			5.200	8.530	JJ	398,870	865,020	05/16/2000	01/15/2098
775371-AU-1	ROHM & HAAS CO DEBS				3FE	8,127,497		106.5380	6,988,880	6,560,000		7,920,750			7.850	6.028	JJ	237,454	514,960	02/13/2004	07/15/2029
783549-AZ-1	RYDER SYSTEM INC MTN				2FE	13,902,749		94.2580	13,523,138	14,347,000		13,986,397			6.900	7.215	JD	83,093	997,117	05/25/2006	12/01/2025
78355H-JH-3	RYDER SYSTEM INC MTN				2FE	6,266,210		103.0640	6,415,722	6,225,000		(6,004)			5.500	4.753	JD	13,833	155,625	07/09/2009	06/15/2012
78355H-JK-6	RYDER SYSTEM INC				2FE	11,894,750		99.4190	11,930,280	12,000,000		11,920,808			5.850	5.969	MN	117,000	702,000	01/23/2007	11/01/2014
78355H-JL-4	RYDER SYSTEM INC MTN				2FE	10,055,000		104.7080	10,470,810	10,000,000		(4,217)			5.850	5.711	MS	195,000	292,500	07/09/2009	03/01/2014
78355H-JM-2	RYDER SYSTEM INC MTN				2FE	8,667,296		105.1240	8,830,424	8,400,000		(8,648,345)			6.000	4.973	MS	168,000	120,000	10/02/2009	03/01/2013
78442F-AB-4	SLM CORP BASIC				2FE	13,726,100		93.7470	12,655,899	13,584,613		(29,187)			5.125	4.870	FA	238			

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
79546V-AF-3	SALLY HOLDINGS LLC			1	5FE	1,000,000		1,075,000	1,000,000	1,000,000					10.500	10.500	MN	13,417	105,000	08/28/2007	11/15/2016
795770-AN-6	SALTON SEA FUNDING CORP SER F			2	2FE	2,327,089		1,066,719	2,483,059	2,326,976			(38)		7.475	7.471	MN	14,977	173,923	07/19/2006	11/30/2018
803111-AK-9	SARA LEE CORP UNSEC'D NTS			2	2FE	12,173,275		106,690	11,650,493	10,920,000			(162,496)		6.250	4.587	MS	200,958	682,500	04/30/2003	09/15/2011
806605-AG-6	SCHERING-PLOUGH NTS			1	1FE	38,557,241		112,327	41,488,125	36,935,000			(31,499)		6.500	5.328	JD	200,065	2,493,113	09/16/2004	12/01/2033
806605-AJ-0	SCHERING-PLOUGH BASIC			1	1FE	24,877,750		111,075	27,768,625	25,000,000			9,964		6.000	6.066	MS	441,667	1,500,000	09/12/2007	09/15/2017
80874Y-AG-5	SCIENTIFIC GAMES INTERNA			1	3FE	377,974		105,000	409,500	390,000			241		9.250	9.746	JD	1,603	20,443	10/30/2009	06/15/2019
80874Y-AH-3	SCIENTIFIC GAMES INTERNA 144A			1	3FE	203,051		105,000	210,000	200,000			(12)		9.250	8.965	JD	822	10,483	10/30/2009	06/15/2017
81211K-AJ-9	SEALED AIR CORP NTS 144A			1	3FE	59,798		105,736	63,442	60,000			21		5.625	5.669	JJ	1,556	3,375	06/26/2003	07/15/2013
814138-AK-9	SECURITY CAPITAL INDUSTRIAL TR DEB			1	2FE	4,489,106		96,994	4,728,438	4,875,000			22,102		7.625	8.528	JJ	185,859	383,906	01/03/2001	07/01/2017
81413P-AG-0	SECURITY CAPITAL CORP SR NTS			1	1FE	11,010,118		85,180	9,263,303	10,875,000			(3,201)		7.700	7.588	JD	37,217	837,375	09/17/2002	06/15/2028
816391-AD-8	SELKIRK COGEN FUNDING CORP FMB			2	3FE	5,685,143		104,927	5,965,250	5,685,143					8.980	8.846	JD	7,091	510,526	05/09/1994	06/26/2012
823777-AE-7	Sheridan Acquisition Crp			1	4FE	926,500		93,370	793,688	850,000			(12,348)		10.250	7.806	FA	32,914	87,125	03/04/2005	08/15/2011
82459A-AA-9	Shingle Springs Tribal Gaming Series 144A			1	5FE	241,200		76,000	254,600	335,000			2,744	93,800	9.375	9.375	JD	1,396	31,406	06/22/2007	06/15/2015
82567D-AE-4	SHURGARD STORAGE CENTERS A UNSEC'D NTS			1	1FE	6,748,248		105,228	7,102,917	6,750,000			90		7.750	7.752	FA	187,453	523,125	10/19/2001	02/22/2011
826428-AN-4	SIERRA PACIFIC RESOURCES			1	3FE	4,189,426		97,429	4,189,426	4,189,465			(583)	122,902	6.750	6.673	FA	109,650	290,250	04/13/2006	08/15/2017
828807-AH-0	SIMON PROPERTY GROUP INC NTS			1	1FE	6,283,691		104,391	5,642,355	5,405,000			(134,342)		7.750	5.032	JJ	187,336	418,888	10/30/2003	01/20/2011
828807-BA-4	SIMON PROPERTY GROUP INC NTS			1	1FE	1,137,576		100,661	1,172,705	1,165,000			4,743		4.875	5.303	MS	16,249	56,794	08/18/2003	03/18/2010
832248-AR-9	SMITHFIELD FOODS INC			1	5FE	589,289		98,375	688,625	700,000			12,412		4.000	8.748	JD	78	24,000	08/05/2009	06/30/2013
833034-AE-1	SNAP-ON INC. BASIC			2	2FE	3,879,120		99,950	3,998,096	4,000,000			3,895,475		5.500	5.960	JJ	101,444	220,000	07/31/2008	01/15/2017
833034-AH-4	SNAP-ON INC.			2	2FE	8,166,480		102,370	7,882,721	7,700,000			8,162,712		6.125	5.422	MS	179,480		12/04/2009	09/01/2021
834376-AK-1	SOLUTIA INC			1	4FE	250,000		104,125	260,313	250,000			250,000		8.750	8.750	MN	4,618		10/09/2009	11/01/2017
84263P-AC-4	SOUTHERN CONN GAS			1	1FE	8,700,000		112,048	9,748,133	8,700,000			8,700,000		7.950	7.950	FA	261,290	345,825	02/26/2009	08/03/2026
843452-BC-6	SOUTHERN NAT GAS Series 144A			2	2FE	998,340		102,694	1,026,936	1,000,000			138		5.900	5.922	AO	14,750	59,000	03/14/2007	04/01/2017
843646-AC-4	SOUTHERN POWER CO B			2	2FE	7,608,160		108,902	7,623,147	7,000,000			(89,058)		6.250	3.185	JJ	201,736		07/14/2009	07/15/2012
843646-AF-7	SOUTHERN POWER CO BASIC			2	2FE	17,625,212		104,082	17,277,562	16,600,000			(14,187)		4.875	3.650	JJ	373,154		12/09/2009	07/15/2015
844730-AG-6	SOUTHTRUST CORP NTS			2	1FE	2,246,490		104,761	2,357,116	2,250,000			334		5.800	5.820	JD	5,800	130,500	05/19/2004	06/15/2014
844741-AG-3	SOUTHWEST AIR PTC 1993-B			2	2FE	256,928		103,905	272,274	262,041			288		6.260	6.504	MS	4,420	16,404	09/21/1993	09/24/2012
8447HE-AA-4	SOUTHTRUST BK ATLANTA MTN			1	1FE	1,043,160		107,950	1,079,547	1,000,000			(1,121)		7.740	7.380	MN	9,890	77,400	05/24/1995	05/15/2025
844895-AR-3	SOUTHWEST GAS CORP BASIC			2	2FE	3,241,888		106,524	2,982,666	2,800,000			(80,829)		8.375	5.198	FA	88,589	234,500	05/27/2005	02/15/2011
844895-AS-1	SOUTHWEST GAS CORP BASIC			2	2FE	5,715,627		108,841	5,420,292	4,980,000			(108,983)		7.625	5.067	MN	48,520	379,725	06/23/2005	05/15/2012
852060-AD-4	SPRINT CAP CORP			1	3FE	36,376,039		83,125	29,450,356	35,429,000			36,300,507		6.875	6.644	MN	311,234	2,435,744	05/10/2006	11/15/2028
852061-AA-8	SPRINT CORP COM DEB			1	3FE	820,000		97,500	975,000	1,000,000			827,518		9.250	11.373	AO	19,528	92,500	05/07/1992	04/15/2022
852862-AB-7	Stanadyne corp			1	5FE	2,080,000		91,000	1,820,000	2,000,000			(11,288)		10.000	9.235	FA	75,556	200,000	03/30/2005	08/15/2012
855030-AH-5	STAPLES BASIC			2	2FE	3,993,825		110,072	4,127,693	3,750,000			3,961,106		7.375	5.150	AO	69,141	138,281	07/09/2009	10/01/2012
855030-AJ-1	STAPLES BASIC			2	2FE	47,587,065		121,845	51,841,435	42,547,000			(411,359)		9.750	6.593	JJ	1,912,842	1,082,104	08/31/2009	01/15/2014
857477-AB-9	STATE STREET CORP SUB NTS			1	1FE	16,974,565		102,910	14,921,994	14,500,000			(374,793)		7.650	4.910	JD	49,300	1,109,250	12/03/2002	06/15/2010
857689-AZ-6	STATION CASINOS INC.			1	6FE	8,750		0,500	8,750	1,750,000			8,750		6.625	5,126,729	MS			11/29/2006	03/15/2018
86664R-AB-2	SUN CANADA FINL CO SUB NOTE 144A			2	1FE	28,422,765		99,610	28,390,902	28,500,000			4,602	93,938	7.250	7.276	JD	91,833	2,066,250	12/14/1995	12/15/2015
867914-AR-4	SUNTRUST BANK INC SUB NOTES			2	2FE	24,034,538		101,848	22,997,369	22,580,000			(304,598)		7.750	6.756	MN	291,658	1,749,950	10/02/2001	05/01/2010
86881R-AA-1	Surgical Care Affiliates Series 144A			1	4FE	1,147,696		91,000	1,147,696	1,147,696					8.875	8.875	JJ	46,968	101,287	07/15/2009	07/15/2015
870836-AC-7	SWISS BANK CORP NY SUB DEBS			1	1FE	6,767,810		99,916	5,445,395	5,450,000			(43,341)		7.500	5.558	JJ	188,479	408,750	01/14/2004	07/15/2025
870836-AD-5	SWISS BANK CORP NY SUB DEBS			1	1FE	10,062,405		106,289	11,160,387	10,280,769			29,364		7.000	7.451	AO	155,167	735,000	11/17/1999	10/15/2015
870845-AC-8	SWISS BANK CORP-NY SUB DEBS			1	1FE	15,047,000		100,720	15,118,725	15,000,000			(1,107)		7.750	7.723	MS	387,500	1,162,500	09/25/1996	09/01/2026
871928-AX-5	TIERS CORP BND BKO CTF-AGC 144A			2	4FE	11,039,140		77,580	8,293,715	10,690,533			(24,459)		8.125	7.580	MS	255,756	868,606	10/02/2002	09/15/2017
87255M-AA-8	TL ACQUISITIONS INC SERIES 144A			1	5FE	9,131,970		95,625	8,845,313	9,250,000			9,161,824		10.500	10.750	JJ	447,854	971,250	06/22/2007	01/15/2015
873050-BS-9	TTX CORP NTS 144A			2	2FE	9,995,900		99,865	9,996,500	10,000,000			9,999,359		4.500	4.507	JD	20,000	450,000	12/12/2003	12/15/2010
873050-BU-4	TTX CORP NTS 144A			2	2FE	9,990,200		99,920	9,992,010	10,000,000			9,994,965		5.625	5.638	JD	46,875	562,500	06/01/2004	06/01/2014
873050-BX-8	TTX CORP 144A			2	2FE	14,927,700		98,602	14,790,270	15,000,000			14,973,881		5.000	5.083	AO	187,500	750,000	04/04/2005	04/01/2012
875127-AV-4	TAMPA ELECTRIC			2	2FE	10,175,200		105,976	10,597,600	10,000,000			(2,436)		6.550	6.415	MN	89,694	655,000	07/10/2007	05/15/2036
87875U-AB-8	TECO FINANCE INC BASIC			2	2FE	4,097,427		106,7													

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
880394-AE-1	TENNECO PACKAGING DEBS				2FE	4,980,518	102.0600	5,102,995	5,000,000	4,983,172		422			8.375	8.412	AO	88,403	418,750	11/05/1999	04/15/2027
880451-AT-6	TENNESSEE GAS PIPELINE				2FE	263,753	110.8950	277,238	250,000	277,381	(760)				7.500	6.974	AO	4,688	18,750	01/27/1998	04/01/2017
881448-AG-9	TERREMARK WORLDWIDE INC 144A			1	4FE	661,181	110.5000	767,975	695,000	662,455		1,274			12.000	13.000	JD	3,707	39,615	06/17/2009	06/15/2017
881609-AT-8	TESORO PETROLEUM CORP			1	3FE	797,038	93.0000	869,550	935,000	812,698		11,213			6.500	8.951	JD	5,065	60,775	08/14/2008	06/01/2017
881609-AW-1	TESORO PETROLEUM CORP			1	3FE	1,408,954	103.5000	1,449,000	1,400,000	1,409,131		177			9.750	9.562	JD	11,375	66,733	10/05/2009	06/01/2017
882389-CA-5	TEXAS EASTERN TRANSMISSION UNSEC'D NTS				2FE	7,623,924	105.1510	6,808,527	6,475,000	6,638,221		(171,197)			7.300	4.455	JD	39,390	472,675	07/07/2003	12/01/2010
884315-AG-7	THOMAS & BETTS CORP				2FE	9,918,600	97.7560	9,775,550	10,000,000	9,919,083		483			5.625	5.720	MN	59,375		11/16/2009	11/15/2021
88633P-AB-0	TICKETMASTER ONLINE-CITY - B			1	3FE	1,581,387	107.7500	1,707,838	1,585,000	1,581,547		160			10.750	10.797	FA	70,995		08/11/2009	08/01/2016
887315-AM-1	TIME WARNER COMPANIES INC DEB				2FE	14,053,264	120.6830	15,248,348	12,635,000	13,732,063		(46,013)			9.150	8.064	FA	481,709	1,219,278	07/21/2000	02/01/2023
88731E-AJ-9	TIME WARNER SR NTS				2FE	11,023,000	119.5440	11,954,410	10,000,000	10,931,045		(14,136)			8.375	7.525	JJ	386,181	837,500	06/21/2001	07/15/2033
88732J-AV-0	Time Warner Cable - A				2FE	4,967,650	98.7950	4,939,725	5,000,000	4,967,905		255			3.500	3.638	FA	9,722		12/08/2009	02/01/2015
88830M-AD-4	TITAN INTL INC				4FE	1,329,152	98.0000	1,288,700	1,315,000	1,321,939		(3,055)			8.000	7.714	JJ	48,509	105,200	05/31/2007	01/15/2012
891490-AS-3	TOSCO CORP NOTES				1FE	10,030,150	116.0340	11,603,430	10,000,000	10,029,446		(135)			7.900	7.875	JJ	395,000	790,000	08/15/1997	01/01/2047
89566E-AA-6	TRISTATE GEN/TRANS ASSN BONDS 144A			2	1FE	11,115,845	102.1720	10,870,269	10,639,196	10,909,607		(33,856)			6.040	5.314	JJ	269,538	642,607	05/06/2005	01/31/2018
89566E-AB-4	TRISTATE GEN/TRANS ASSN BONDS SER B 144A			2	1FE	9,511,515	101.7590	9,244,797	9,085,000	9,440,472		(14,083)			7.144	6.719	JJ	272,233	649,032	03/02/2004	07/31/2033
895953-AD-9	YUM BRANDS INC UNSEC'D SR NTS				2FE	18,290,092	108.2070	16,231,095	15,000,000	15,699,831		(514,816)			8.875	5.076	AO	281,042	1,331,250	06/16/2004	04/15/2011
896522-AF-6	TRINITY INDUSTRIES				3FE	1,197,450	74.7500	1,177,313	1,575,000	1,198,357		908			3.875	5.624	JD	5,086	20,344	12/18/2009	06/01/2036
89816W-AA-4	TRUMP ENTERTAINMENT RES			1	6FE	16,500	2.0630	16,500	800,000	16,500		(30)	89,500		8.500	65.540	AD		(34,000)	10/19/2005	06/01/2015
898404-AB-4	Truststreet Properties Inc.				1FE	2,078,478	103.4110	2,135,443	2,065,000	2,071,905	30	(1,829)			7.500	7.382	AO	38,719	154,875	12/07/2005	04/01/2013
900262-AR-7	TURNER BROADCASTING SYSTEM /TURNER BROADCAST SR NOTES				2FE	1,523,263	113.9540	1,663,725	1,460,000	1,483,183		(5,556)			8.375	7.847	JJ	61,138	129,575	03/02/2000	07/01/2013
9021E0-AD-6	Tyco/tyco intl fin sa				2FE	12,463,440	112.1950	12,341,406	11,000,000	12,460,082		(3,358)			6.875	5.273	JJ	348,715		12/15/2009	01/15/2021
902549-AE-4	UAL CORP			1	6FE	1,073,775	91.0000	1,478,750	1,625,000	994,885	(65,689)		126,191		5.000	7.114	JD	226	81,250	01/14/2009	02/01/2021
902917-AH-6	WASTE MANAGEMENT INC UNSEC'D SR NTS				2FE	5,191,200	107.7010	5,385,065	5,000,000	5,169,772		(4,536)			7.000	6.678	JJ	161,389	350,000	06/25/2004	07/15/2028
903293-AV-0	USG CORP 144A				3FE	686,602	106.7500	747,250	700,000	687,456		854			9.750	10.250	FA	27,869		07/30/2009	08/01/2014
90333E-AC-2	USEC INC				5FE	3,239,202	65.0000	3,185,000	4,900,000	3,284,945		45,743			3.000	12.386	AO	36,750	8,250	12/21/2009	10/01/2014
90333L-AB-8	U S CONCRETE INC			1	5FE	766,594	60.1250	766,594	1,275,000	766,698		17,186	486,306		8.375	7.165	AO	26,695	106,781	08/01/2005	04/01/2014
90338W-AK-9	US ONCOLOGY INC				4FE	489,946	105.0000	525,000	500,000	490,019		73			9.125	9.496	FA	17,236		12/15/2009	08/15/2017
904201-AA-8	UMBRELLA ACQUISITION Series 144A			1	5FE	762,500	87.6250	4,611,266	5,262,500	709,386		(31,752)	146,622		9.750	43.083	MS	151,078	506,250	09/15/2009	03/15/2015
904764-AG-2	UNILEVER CAPITAL NTS				1FE	9,286,252	105.4090	8,432,728	8,000,000	8,173,108		(200,287)			7.125	4.442	MN	95,000	570,000	10/09/2003	11/01/2010
904764-AH-0	UNILEVER CAPITAL NTS				1FE	9,676,150	106.6350	10,663,500	10,000,000	9,691,180		5,995			5.900	6.153	MN	75,389	590,000	07/24/2007	11/15/2032
904851-AA-0	UNIONBANCAL CORPORATION NOTES				1FE	5,911,125	102.7310	5,885,453	5,729,000	5,813,054		(18,850)			5.250	4.838	JD	12,532	300,773	02/19/2004	12/16/2013
907818-AZ-1	UNION PACIFIC CORP BONDS				2FE	5,296,750	111.0790	5,553,925	5,000,000	5,264,942		(31,808)			7.000	5.949	FA	145,833	175,000	02/03/2009	02/01/2016
907818-CK-2	UNION PACIFIC CORP UNSEC'D NTS				2FE	13,646,343	105.4770	12,927,298	12,256,000	12,477,388		(203,233)			6.650	4.844	JJ	375,817	815,024	10/02/2007	01/15/2011
907818-CN-6	UNION PACIFIC CORP NTS				2FE	2,690,856	108.7070	2,608,966	2,400,000	2,479,709		(36,605)			6.125	4.403	JJ	67,783	147,000	07/03/2003	01/15/2012
907818-CP-1	UNION PACIFIC CORP NTS				2FE	5,650,300	109.2060	5,460,295	5,000,000	5,206,650		(83,959)			6.500	4.574	AO	68,611	325,000	02/09/2004	04/15/2012
907818-CU-0	UNION PACIFIC CORP NTS				2FE	4,922,200	103.5570	5,177,850	5,000,000	4,928,133		1,215			6.250	6.367	MN	52,083	312,500	04/29/2004	05/01/2034
907818-DB-1	UNION PACIFIC CORP BASIC				2FE	12,468,700	121.0000	13,310,011	11,000,000	12,365,848		(102,852)			7.875	6.069	JJ	399,438	433,125	01/29/2009	01/15/2019
908068-AG-4	UNION PLANTERS CORP UNSEC'D SUB NTS				2FE	2,944,710	99.4250	2,485,620	2,500,000	2,581,320		(66,477)			7.750	4.837	MS	64,583	193,750	10/31/2003	03/01/2011
908584-DE-2	UNION TANK CAR CO DEBS			2	1FE	996,980	110.3830	996,980	1,100,498	996,980					8.625	8.625	JJ	42,756	85,990	06/24/1992	07/02/2013
909205-AB-2	Unisource Energy Corp			1	3	3,154,519	99.7500	3,241,875	3,250,000	3,154,735		282			4.500	4.646	MS	48,750	146,250	01/26/2009	03/01/2035
909440-AP-4	UNITED AUTO GROUP INC			1	5FE	1,000,000	96.7500	967,500	1,000,000	1,000,000					7.750	7.750	JD	3,444	77,500	06/07/2007	12/15/2016
91019P-CL-4	UNITED DOMINION RLTY TR NTS				2FE	4,968,850	100.0600	5,003,005	5,000,000	4,988,833		5,686			3.900	4.018	MS	57,417	195,000	03/15/2004	03/15/2010
911308-AA-2	UNITED PARCEL SERVICE DEBS				1FE	8,871,064	126.4030	8,557,476	6,770,000	8,269,223		(106,428)			8.375	5.516	AO	141,747	566,988	02/02/2004	04/01/2020
911312-AK-2	UNITED PARCEL SERVICE - CL B				1FE	37,473,375	105.5250	39,571,838	37,500,000	37,475,437		2,062			5.125	5.134	AO	480,469	998,307	03/19/2009	04/01/2019
911312-AL-0	UNITED PARCEL SERVICE - CL B				1FE	39,911,200	103.8970	41,558,960	40,000,000	39,924,036		12,836			3.875	3.924	AO	387,500	805,139	03/19/2009	04/01/2014
912920-AG-0	US WEST COMMUNICATIONS DEBS			1	2FE	7,829,088	82.0000	7,175,000	8,750,000	7,869,766		4,954			7.125	7.989	MN	79,601	623,438	09/15/2000	11/15/2043
912920-AM-7	US WEST COMMUNICATIONS DEBS			1	2FE	2,957,250	88.0000	2,640,000	3,000,000	2,961,777		489			7.250	7.361	AO	45,917	217,500	10/10/1995	10/15/2035
913017-AT-6	UNITED TECHNOLOGIES NOTES				1FE	4,141,224	112.0770	5,207,097	4,646,000	4,212,366		9,972			6.700	7.					



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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
918436-AD-8	WVR Funding Inc Series B			1	5FE	2,000,000	104.0000	2,080,000	2,000,000	2,000,000					10.250	10.250	JJ	94,528	205,000	02/21/2008	07/15/2015
920355-AC-8	VALSPAR CORP				2FE	5,995,620	95.6940	5,741,622	6,000,000	5,995,620					5.100	5.439	FA	127,500	306,000	07/12/2005	08/01/2015
920355-AD-6	VALSPAR CORP				2FE	5,179,000	104.7960	5,239,810	5,000,000	5,155,200		(23,180)			5.625	4.207	MN	46,875	140,625	08/13/2009	05/01/2012
920355-AE-4	VALSPAR CORP				2FE	6,483,360	101.2690	6,582,511	6,500,000	6,487,104		1,360			6.050	6.084	MN	65,542	393,250	04/12/2007	05/01/2017
920355-AF-1	VALSPAR CORP				2FE	26,109,670	109.7370	28,531,698	26,000,000	26,105,521		(4,149)			7.250	7.190	JD	83,778	921,556	06/24/2009	06/15/2019
923366-99-9	VERASUN ENERGY Escrow - Priced at 0				6Z		0.0000		720,000						0.000	0.000	JD			04/23/2009	12/15/2012
92344S-AJ-9	VERIZON WIRELESS				1FE	14,898,159	114.8670	17,229,990	15,000,000	14,901,051		2,892			7.375	7.575	MN	141,354		11/15/2009	11/15/2013
92344S-AK-6	VERIZON WIRELESS				1FE	29,153,913	124.0380	31,009,550	25,000,000	29,108,004		(45,910)			8.500	6.076	MN	271,528		11/15/2009	11/15/2018
92344X-AB-5	VERIZON NEW YORK INC BONDS				1FE	2,962,860	107.7200	3,231,609	3,000,000	2,966,433		577			7.375	7.479	AO	55,313	221,250	03/25/2002	04/01/2032
925524-AH-3	CBS CORP GLOBAL BONDS				2FE	11,741,963	107.8540	10,461,848	9,700,000	11,542,543		(43,386)			7.875	6.224	JJ	320,403	763,875	03/01/2005	07/30/2030
925524-AO-3	CBS CORP SR UNSEC'D CO GTY				2FE	27,363,999	104.7960	25,624,620	24,452,000	25,112,619		(457,381)			6.625	4.567	MN	206,993	1,619,945	09/22/2004	05/15/2011
925524-AU-4	CBS CORP BASIC				2FE	10,281,920	92.6730	10,193,975	11,000,000	10,490,486		47,236			4.625	5.318	MN	65,000	508,750	02/22/2005	05/15/2018
927804-FB-5	VA ELEC & PWIR CO				1FE	19,944,800	103.5440	20,708,780	20,000,000	19,946,597		756			6.000	6.020	MN	153,333	1,200,000	05/14/2007	05/15/2037
929290-AO-0	WMX TECHNOLOGIES INC NTS				2FE	5,926,700	108.2450	5,412,260	5,000,000	5,772,051		(27,531)			7.100	5.653	FA	147,917	355,000	06/12/2003	08/01/2026
929903-AM-4	WACHOVIA CORP BASIC				1FE	7,166,125	88.2660	6,619,973	7,500,000	7,185,064		5,256			5.500	5.817	FA	171,875	412,500	01/10/2007	08/01/2035
931142-AU-7	WAL-MART STORES INC DEB'S				1FE	13,931,850	115.7670	17,364,975	15,000,000	14,207,533		29,988			6.750	7.351	AO	213,750	1,012,500	09/30/1994	10/15/2023
93114K-AC-7	WAL-MART STORES P/T TRUSTS SER 94-A1			2	1FE	105,971	100.0120	103,872	103,859	103,861		(464)			8.570	8.333	JJ	4,426	8,901	11/03/1994	01/02/2010
931422-AE-9	WALGREEN CO BASIC				1FE	14,921,550	106.1210	15,918,120	15,000,000	14,927,522		5,972			5.250	5.318	JJ	363,125	398,125	01/08/2009	01/15/2019
93936K-BK-4	WASHINGTON NATURAL GAS CO MTN				2FE	15,000,000	109.9350	16,490,265	15,000,000	15,000,000					7.150	7.150	JD	47,667	1,072,500	12/15/1995	12/19/2025
939653-AE-1	WASHINGTON REIT NTS				2FE	4,999,250	95.1910	4,759,530	5,000,000	4,999,825		38			5.250	5.251	JJ	121,042	262,500	12/08/2003	01/15/2014
941063-AF-6	WASTE MANAGEMENT INC DEBS				2FE	1,347,637	105.9510	1,303,201	1,230,000	1,251,215		(16,543)			7.650	6.137	MS	27,706	94,095	01/22/2003	03/15/2011
94106L-AK-5	WASTE MANAGEMENT INC UNSEC'D SR NTS				2FE	5,443,750	103.5860	5,179,320	5,000,000	5,041,761		(68,389)			7.375	5.897	FA	153,646	368,750	01/16/2003	08/01/2010
94874R-AY-2	WEINGARTEN REALTY INVST MTN A (PUT)				2FE	5,458,250	90.9740	4,548,710	5,000,000	5,388,621		(13,575)			6.640	5.898	MS	97,756	332,000	01/23/2004	07/15/2026
94973V-AG-2	WELLPOINT INC				1FE	4,188,550	104.0320	5,201,595	5,000,000	4,310,968		107,982			5.000	8.464	JD	11,111	250,000	11/07/2008	12/15/2014
94973V-AH-0	WELLPOINT INC BASIC				1FE	38,015,225	94.7820	35,069,266	37,000,000	37,934,912		(18,079)			5.950	5.754	JD	97,844	2,201,500	05/18/2006	12/15/2034
94973V-AM-9	WELLPOINT INC BASIC				1FE	14,863,050	103.0250	15,453,780	15,000,000	14,890,961		11,307			5.875	5.997	JD	39,167	881,250	07/24/2007	06/15/2017
94973V-AN-7	WELLPOINT INC BASIC				1FE	17,714,580	101.7580	18,316,386	18,000,000	17,724,458		3,568			6.375	6.495	JD	51,000	1,147,500	12/04/2007	06/15/2037
94974E-AE-7	WELLS FARGO BANK NA UNSEC'D GLOBAL NTS				1FE	16,199,969	103.2510	14,289,233	13,820,000	13,991,754		(353,289)			7.550	4.840	JD	28,984	1,043,410	05/08/2003	06/21/2010
950810-AH-7	WESCO DISTRIBUTION INC 144A			1	4FE	407,400	97.7500	474,088	485,000	414,515		5,695			7.500	10.256	AO	7,679	36,375	09/25/2008	10/15/2017
961548-AL-8	WESTVACO CORP DEBS				3FE	9,834,500	106.1880	10,618,780	10,000,000	9,888,596		5,805			9.750	9.923	JD	43,333	975,000	08/17/1990	06/15/2020
961548-AQ-7	WESTVACO CORP DEB			2	3FE	2,212,513	92.6540	1,885,509	2,035,000	2,178,905		36,559			7.650	6.939	MS	45,838	155,678	01/29/1999	03/15/2027
961548-AR-5	WESTVACO CORP SOLID WASTE FAC REV 97A 144A				3FE	5,443,190	70.7010	3,888,555	5,500,000	5,451,409		1,204			7.670	7.762	JJ	194,520	421,850	06/19/2000	01/15/2027
961548-AS-3	WESTVACO CORP DEB			2	3FE	13,068,198	87.6100	10,797,933	12,325,000	12,789,315		(16,300)			7.500	6.908	JD	41,083	924,375	11/20/1998	06/15/2027
961548-AV-6	WESTVACO CORP UNSEC'D DEBS				3FE	17,865,021	102.8790	15,045,995	14,625,000	17,481,393		(68,798)			8.200	6.448	JJ	552,988	1,199,250	05/28/2003	01/15/2030
961548-AY-0	WESTVACO CORP BASIC				3FE	8,280,766	97.5820	8,440,852	8,650,000	8,289,654		6,530			7.950	8.355	FA	259,788	687,675	02/14/2005	02/15/2031
962166-AS-3	WEYERHAEUSER CO DEBENTURES				3FE	16,082,260	91.0400	14,771,240	16,225,000	16,125,186		4,191			7.125	7.197	JJ	533,059	1,156,031	03/03/1998	07/15/2023
962166-AT-1	WEYERHAEUSER CO DEBS				3FE	2,137,160	103.0440	2,060,878	2,000,000	2,115,185		(4,135)			8.500	7.831	JJ	78,389	170,000	07/31/2003	01/15/2025
962166-AW-4	WEYERHAEUSER CO DEBS				3FE	17,786,835	90.5600	15,395,268	17,000,000	17,702,579		(25,527)			6.950	6.544	AO	295,375	1,059,875	09/08/2004	10/01/2027
962166-BT-0	WEYERHAEUSER CO BASIC				3FE	10,189,608	88.6640	7,802,397	8,800,000	10,082,656		(24,489)			6.875	5.747	JD	26,889	605,000	02/02/2005	12/15/2033
963320-AH-9	WHIRLPOOL CORP DEBS				2FE	987,400	105.6330	1,056,329	1,000,000	993,709		712			7.750	7.875	JJ	35,736	77,500	09/04/1996	07/15/2016
963320-AK-2	WHIRLPOOL CORP UNSEC'D NTS				2FE	12,274,750	102.1450	10,214,470	10,000,000	10,119,826		(351,522)			8.600	4.897	MN	143,333	860,000	02/04/2003	05/01/2010
96432Y-AA-9	WHITE PINE HYDRO PORTF				3	9,000,000	86.4430	7,779,825	9,000,000	9,000,000					7.260	7.260	JJ	292,215	653,400	05/30/2007	07/20/2015
969133-AK-3	WILLAMETTE IND DEBS				3FE	14,650,860	88.3470	12,368,524	14,000,000	14,550,773		(16,883)			7.850	7.430	JJ	549,500	1,099,000	07/18/2002	07/01/2026
969130-BA-3	WILLAMETTE IND MTN SER C				3FE	7,500,000	101.8900	7,641,720	7,500,000	7,500,000					6.600	6.602	MN	63,250	495,000	07/02/1998	07/09/2012
971807-AC-6	WILMINGTON TRUST CORPORATION NTS				3FE	4,775,200	94.1210	4,706,050	5,000,000	4,853,364		21,861			4.875	5.870	AO	51,458	121,875	12/18/2007	04/15/2013
973735-AY-9	WINDSOR PETRO TRANS SEC NOTE 144A			2	3FE	4,146,082	91.8330	4,565,518	4,971,560	4,346,408		30,580			7.840	9.723	JJ	179,727	389,770	07/07/2000	01/15/2021
97381W-AC-8	WINDSTREAM CORP BASIC				3FE	1,650,000	103.7500	2,075,000	2,000,000	1,718,498		58,425			8.125	13.180	FA	162,500	162,500	10/22/2008	08/01/2013
976656-BL-1	WISCONSIN ELECTRIC POWER NOTES				1FE	39,561,150	106.7010	44,814,210													

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	Bond Char	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
989701-AM-9	ZIONS BANCORP BASIC				3FE	30,644,602	70.6990	23,189,141	32,800,000	30,734,420		48,006	1,688,291		5.500	5.727	MN	225,500	1,564,750	12/18/2007	11/16/2015
BL5336-55-9	Genetek Holding				4FE	294,000	100.7920	302,375	300,000	300,000		163			7.250	7.806	MJSD	1,873		10/28/2009	10/29/2014
BL5409-55-4	BL Cit Group Exp Bank Loans				6	950,000	102.3330	1,023,333	1,000,000	952,501		2,501			9.500	2.307		6,597	11,780	10/26/2009	01/18/2012
BL5427-65-5	Michaels Stores Bank Loans				4FE	446,880	93.9290	536,106	570,759	448,508		1,628			4.812	7.924		3,357		11/30/2009	07/31/2016
BL5502-45-7	TASC Inc. Term Loan A				3FE	89,100	100.1670	90,150	90,000	89,104		4			0.000	0.199	MJSD			12/14/2009	12/18/2014
BL5502-49-9	TASC Inc. Term Loan B				3FE	178,200	100.4580	180,825	180,000	178,208		8			5.750	6.025	MJSD	345		12/14/2009	12/18/2014
EG4565-52-9	US CORRUGATED INC				4FE	1,076,225	83.0000	1,037,500	1,250,000	1,113,550		26,263			10.000	13.374	JD	10,417	125,000	05/31/2007	06/01/2012
LN0135-81-1	BL CHARTER COMM CHARTER COMMUNICATIONS				3FE	2,252,650	93.6250	2,775,710	2,964,710	2,381,441		119,269			2.260	4.832		5,956	138,015	01/06/2009	09/06/2014
LN1953-14-7	Vought Aircraft Company Bank Loan				3FE	137,916	100.0000	172,395	146,267	146,267		8,351			0.234	8.453		36	3,698	04/17/2009	12/22/2011
LN1986-74-1	Accuride Corporation Bank Loan Bank Loan				3FE	1,541,000	99.6460	1,594,333	1,600,000	1,548,686		3,211			10.000	2.519		444	96,825	08/19/2009	01/31/2012
LN2303-11-0	Neiman Marcus Group Inc Bank Loans				4FE	294,102	90.3210	355,368	393,448	306,109		12,006			2.255	9.464		616	4,568	06/02/2009	04/06/2013
LN2641-10-5	BL SENSATA TLB Kansas City Southern Railway Kansas City Southern				4FE	422,832	88.6880	819,670	924,223	490,256		67,424			2.031	19.486	JAJO	3,336	14,588	02/24/2009	04/27/2013
LN2683-18-0	Railway				3FE	820,620	93.0000	918,107	987,212	859,809		32,810			2.039	8.358		1,957	22,690	10/15/2008	04/28/2013
LN2710-10-8	BL UTD COMP INC Bank Loan				4FE	1,250,145	92.2500	1,614,375	1,750,000	1,362,650		112,505			2.250	10.312		2,406	40,972	02/02/2009	06/30/2012
LN2813-80-3	REXNORD CORP TLB1 BANK LOAN				4FE	777,450	93.6880	1,025,878	1,095,000	847,542		67,704			6.003	7.498		9,129	25,001	12/08/2008	07/19/2013
LN2849-00-5	NIELSEN FINANCE LLC/CO				4FE	605,590	93.3750	700,272	749,957	634,366		28,776			2.188	4.743		1,048	31,021	01/29/2009	08/09/2013
LN2915-11-1	WESCO AIRCRAFT H Bank Loans				4FE	497,500	88.2500	617,750	700,000	514,089		16,589			0.187	7.344		116	10,727	08/19/2009	03/29/2014
LN2966-30-4	REYNOLDS & REYNOLDS CO Bank Loans				4FE	207,900	100.3750	210,788	210,000	208,314		414			6.250	0.223		911	438	11/02/2009	04/24/2014
LN3029-72-2	FREESCALE SEMICONDUCTOR INC Bank Loans				4FE	477,594	87.3750	547,620	626,747	493,595		16,001			1.985	6.123		1,071	2,032	06/16/2009	12/01/2013
LN3032-49-4	FORD MOTOR COMPANY Bank Loan				4FE	958,352	92.2500	1,336,058	1,448,302	1,028,677		70,325			3.289	9.048		9,925	2,479	06/08/2009	12/16/2013
LN3034-50-8	BL REVOLON CONSUM Bank Loans				4FE	1,337,500	97.4640	1,461,965	1,500,000	1,369,502		32,002			4.277	5.725		4,099	41,679	06/05/2009	01/15/2012
688248-AJ-5	OSHKOSH TRUCK Bank Loans				4FE	208,134	99.7130	209,632	210,236	211,428		3,294			6.277	0.229		1,613	3,041	07/27/2009	12/06/2013
LN3039-03-6	BL MOMENTIVE TL				5FE	754,587	89.7000	890,611	992,877	791,626		37,040			0.078	5.790		89	19,561	02/26/2009	12/04/2013
LN3098-57-8	HUDSON PRODUCTS Bank Loan				3FE	890,824	78.0000	716,333	918,375	895,048		3,052			7.980	0.431	MJSD	4,682	74,534	08/26/2008	08/24/2015
LN3129-21-7	BUILDING MAT COR Bank Loans				3FE	422,878	92.3130	459,258	497,503	430,997		8,119			3.000	3.319		3,567	3,567	07/10/2009	02/22/2014
LN3161-09-5	BL OPEN SOLUTION TB Bank Loan				4FE	504,375	82.6250	821,931	994,773	564,547		60,172			2.405	14.229		4,652	15,813	03/26/2009	01/23/2014
LN3194-71-6	BL WEST CORP TLB Bank Loan				4FE	1,437,644	93.9290	1,859,452	1,979,644	1,517,325		79,682			2.608	6.531		1,578	41,219	02/09/2009	12/24/2013
LN3210-88-4	LEVEL 3 COMM INC Bank Loans				4FE	341,000	90.6670	362,667	400,000	346,745		5,745			2.530	3.863		2,249	1,446	06/16/2009	03/13/2014
LN3237-17-6	Consolidate Container Co				4FE	429,190	91.3330	453,172	496,173	436,444		7,254			0.078	3.055		33	8,055	06/05/2009	03/28/2014
LN3246-74-8	Harland Clarke Holdings Bank Loan				4FE	902,462	84.2500	1,045,086	1,240,458	941,518		39,056			0.034	6.764		95	26,841	05/26/2009	06/30/2014
LN3281-04-2	Pinnacle Foods Finance Bank Loan				4FE	309,990	93.0000	323,015	347,328	314,826		4,836			2.985	2.345		864	5,170	06/02/2009	04/02/2014
LN3286-03-3	BERRY PLASTICS Bank Loans				4FE	338,261	86.5000	344,230	397,954	341,711		3,450			2.254	3.615		449	2,944	07/27/2009	04/03/2015
LN3288-53-4	Catalent PTS Acquisition Bank Loan				3FE	2,811,100	84.6880	2,633,079	3,109,171	2,885,598		37,961			2.481	1.642		214	89,738	06/04/2008	04/10/2014
LN3311-68-2	VERINT SYSTEMS Bank Loans				4FE	870,000	93.5000	935,000	1,000,000	879,852		9,852			3.490	7.089		873	14,382	06/18/2009	05/25/2014
LN3319-68-5	VERTRUE INC Bank Loans				4FE	410,000	81.5000	407,500	500,000	417,005		7,005			0.035	5.059		45	10,156	07/28/2009	08/18/2014
LN3319-80-0	VERTRUE INC Bank Loan				5FE	156,800	65.0000	159,250	245,000	160,111		3,311			0.079	7.765		49		10/01/2009	08/14/2015
LN3337-14-1	VENOCO INC Bank Loans				4FE	236,250	89.7810	269,344	300,000	245,625		9,375			4.250	14.144		390	4,227	08/12/2009	09/20/2011
LN3337-30-7	SWIFT TRANS CO Bank Loans				4FE	382,500	90.5420	452,709	500,000	392,903		10,403			0.000	5.533	MON			06/26/2009	05/10/2014
LN3343-09-9	Michaels Stores Inc Bank Loan				4FE	322,325	90.0310	381,834	424,112	333,886		11,560			2.562	6.177		1,328	5,487	05/13/2009	10/31/2013
LN3385-88-4	Rite Aid Corp Bank Loans				4FE	1,018,390	87.8500	1,089,806	1,240,530	1,044,728		26,338			1.148	3.853		949	28,033	04/30/2009	06/04/2014
LN3391-63-5	NRG ENERGY				3FE	436,738	94.9750	414,792	436,738	436,738					1.996	0.000		24	12,171	06/08/2007	02/01/2013
LN3391-67-6	NRG ENERGY				3FE	257,328	94.9750	244,397	257,328	257,328					0.151	0.000	MJSD	1	4,822	06/08/2007	02/02/2011
LN3411-16-9	ASURION CORP Bank Loan				4FE	1,129,669	95.5420	1,429,543	1,496,250	1,177,880		48,212			3.244	5.273		3,910	19,053	03/02/2009	07/07/2014
LN3411-24-3	ASURION CORP Bank Loans				3Z	182,000	96.5630	193,125	200,000	182,192		192			6.734	4.002		786	18,506	07/15/2009	07/07/2015
LN3416-15-0	AMMINS				4FE	176,382	86.6250	212,209	244,975	201,500		17,033			2.757	6.193		431	8,607	02/07/2008	06/11/2013
LN3445-06-8	JNVERNESS MEDICAL INNOV				4FE	940,000	96.1880	904,163	940,000	940,000					4.481	0.000		234	48,067	06/26/2007	06/26/2015
LN3452-87-4	Novelis Strip BL NOVELIS STRIP				3FE	978,001	91.1610	1,292,629	1,417,967	1,050,108		67,423			0.044	7.345		89	36,820	01/14/2009	07/06/2014
LN3457-28-7	NIAGRA BANK				4FE	715,413	64.5000	848,975	1,316,240	719,626		12,889			9.250	(2.524)		30,688	69,760	05/19/2008	06/29/2014
LN3486-82-3	New World Gaming				3FE	332,368	82.3130	292,902	355,842	337,854		4,319			2.787	1.078	JAJO		15,622	07/10/2008	07/16/2014
LN3486-86-4	New World Gaming				3FE	1,639,969	82.3130	1,446,113	1,756,857	1,667,288		21,513			2.787	1.087	JAJO	12,376	77,170	07/10/2008	07/16/2014
LN3522-96-5	ALLISON TRANS Bank Loans				4FE	480,293	91.5250														

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
LN3634-69-5	Energy Future Holdings				4FE	2,115,071		81,2500	2,142,457	2,636,870		2,185,196		65,410	3.735	8.927	MON	6,292	94,027	11/06/2009	10/10/2014
LN3647-53-1	NUVEEN INVESTM Bank Loans				4FE	348,344		87,3500	397,750	455,352		455,352		8,720	3.281	4.992		2,698	3,786	06/24/2009	11/13/2014
LN3684-91-4	SEQUA CORP Bank Loan				4FE	777,366		88,9380	1,039,653	1,168,971		830,325		52,959	3.887	7.042		11,106	25,238	01/30/2009	12/03/2014
LN3764-54-2	BL FED MOGUL STR				4FE	280,294		83,7500	343,950	410,687		289,645		9,351	2.167	7.963		519	6,086	06/11/2009	12/27/2014
LN3764-58-3	BL FED MOGUL STR Bank Loans				4FE	143,029		83,7500	175,512	209,566		146,926		3,897	2.167	6.866		265	926	06/11/2009	12/27/2015
LN3775-66-2	SOLUTIA INC Bank Loans				4FE	340,051		101,3390	374,571	369,620		342,693		2,643	7.151	1.768	MJSD	73	16,579	06/18/2009	02/28/2014
LN3782-14-8	BL CALPINE TLB Bank Loan				4FE	361,679		94,4500	388,188	410,998		370,924		9,246	3.135	5.688		36	11,115	05/06/2009	03/29/2014
LN4025-71-1	FOX ACQUISITION SUB LLC Bank Loans				4FE	412,550		94,0000	515,845	548,771		423,578		11,027	0.080	6.865		113	20,316	07/08/2009	07/14/2015
LN4389-26-5	Freescale Semiconductor Inc				4FE	925,639		102,6670	1,881,828	1,832,949		977,718		52,078	12.500	32.392	MJSD	19,730	167,329	03/17/2009	12/15/2014
LN4730-24-5	Rite Aid Corp				4FE	988,800		103,3440	1,064,441	1,030,000		992,417		3,617	0.297	2.955		263	38,024	06/05/2009	06/10/2015
45957@-AD-8	INTERNATIONAL GROUP				2	2,400,000		100,2600	2,406,240	2,400,000		2,400,000			5.240	5.240	AO	21,659	125,760	10/08/2004	10/29/2011
338906-B*-0	FLEXI-VAN LEASING PRIVATE PLACEMENT				3FE	15,000,000		99,7900	14,968,500	15,000,000		15,000,000			5.130	5.130	MN	98,325	769,500	11/03/2004	11/16/2011
39121J-A*-1	GREAT RIVER ENRG PRIVATE PLACEMENT				1Z	14,400,000		105,2430	15,154,992	14,400,000		14,400,000			5.810	5.810	JJ	276,556		08/13/2009	07/01/2021
PP330T-L3-7	SOUTHERN LNG INC PRIVATE PLACEMENT				2FE	14,000,000		123,9260	17,349,640	14,000,000		14,000,000			9.750	9.720	FA	458,792	709,042	02/06/2009	02/24/2016
PP3909-07-2	CAIT LONG PRIVATE PLACEMENT				2	10,900,000		96,8830	10,560,247	10,900,000		10,900,000			5.710	5.710	JJ	286,991	311,195	01/15/2009	01/15/2032
PP390A-RJ-4	Major League Baseball Trust Private Placement				1Z	19,600,000		102,0200	19,995,920	19,600,000		19,600,000			4.270	4.270	JD	53,470		11/20/2009	12/08/2015
PP3X31-AS-6	MARS INC PRIVATE PLACEMENT				1	22,000,000		111,8960	24,617,120	22,000,000		22,000,000			6.470	6.470	AO	336,081	1,423,400	09/12/2008	10/06/2018
PP3X32-TR-6	BRSP LLC Bank Loans				4FE	431,532		97,5000	447,600	459,077		431,857			7.500	7.294		2,391	14,346	06/23/2009	06/30/2014
PP3X32-TS-4	Quebecor Bank Loans				4FE	530,041		100,2500	590,407	588,935		535,891		5,850	9.163	3.523		4,647	11,328	06/29/2009	06/30/2012
PP3X32-UV-5	CASELLA WASTE				3FE	357,305		100,7500	380,936	378,100		359,343			0.304	2.099		70	11,613	07/01/2009	03/31/2014
PP4F1E-AE-9	OMEGA LEASING LLC PRIVATE PLACEMENT				1Z	7,134,372		110,0950	7,854,587	7,134,372		7,134,372			5.980	5.980	JAJO	88,882	105,474	06/03/2009	07/16/2016
PP401N-ZG-3	Army air force exchange srvc PRIVATE PLACEMENT				1	5,700,000		109,8990	6,264,243	5,700,000		5,700,000			5.740	5.740	JD	12,724	163,590	05/21/2009	06/17/2014
13861F-AD-9	CANTOR FITZ LLP PRIVATE PLACEMENT				2	15,000,000		113,8180	17,072,700	15,000,000		15,000,000			9.000	9.000	JJ	675,000		07/01/2009	07/01/2016
74842@-AA-3	QUIKRETE HOLDING PRIVATE PLACEMENT				2Z	10,000,000		97,7540	9,775,400	10,000,000		10,000,000			5.830	5.830	JD	25,911		11/04/2009	12/15/2019
73664F-AA-8	PORTLAND GAS SEC'D SR NTS	2			2	5,898,535		102,8180	6,064,756	5,898,535		5,898,535			5.900	5.943	MJSD	967	348,014	03/18/2003	12/31/2018
81775F-AB-5	SES GLOBAL GTD SR NTS	2			2	10,000,000		107,9060	10,790,600	10,000,000		10,000,000			5.830	5.830	MS	147,369	583,000	07/24/2003	09/30/2015
83787F-AA-9	SO FT MEADE LP (GUAR: CARGILL, INC.)	2			1	1,011,961		102,3960	1,036,207	1,011,961		1,011,961			6.920	6.978	JAJO	12,838	70,005	12/15/1995	12/15/2010
PP5P0M-QQ-5	Chicago Baseball Holdings LLC Private Placement				2Z	11,000,000		106,6650	11,733,150	11,000,000		11,000,000			6.790	6.790	AO	134,857		09/25/2009	10/26/2017
00111@-AA-2	AES HAWAII PRVT PLACEMENT	2			2	8,023,000		104,9350	8,418,935	8,023,000		8,023,000			6.870	6.929	MJSD	1,531	551,180	07/29/2003	06/30/2022
PP6A04-Jg-7	VYTIMINS 1991-1-F TRUST CERTS				1	519,666		112,9490	558,476	494,449		497,344		(5,023)	40.160	9.453	MN	31,992	212,047	05/20/1991	05/03/2010
40453*-AA-6	HACKENSACK MED PL LLC SR SEC NTS (MBIA)	2			2	6,250,743		62,5660	5,304,514	8,478,216		6,340,986		60,921	7.950	11.614	MON	56,168	674,018	05/07/1996	06/01/2028
PP6A0J-2E-7	AMETEK INC PRIVATE PLACEMENT				2	14,250,000		111,4230	15,877,778	14,250,000		14,250,000			7.080	7.080	MS	291,460	1,008,900	08/21/2008	09/17/2018
PP600M-ZP-4	BL SKYPE TECH Bank Loans				4FE	336,375		102,5500	353,798	345,000		336,563		188	3.240	3.551		1,521		11/12/2009	10/19/2014
PP600M-DE-5	TRANSISTRN PIPE PRIVATE PLACEMENT				2Z	12,500,000		95,6750	11,959,375	12,500,000		12,500,000			5.360	5.360	JD	40,944		11/13/2009	12/09/2020
000000-00-0	BL LEAR EXIT TLB PRIVATE PLACEMENT				3FE	143,859		100,2500	145,676	145,313		143,909		50	3.646	3.577		1,060		10/21/2009	11/05/2014
000000-00-0	BL Sinclair Tib PRIVATE PLACEMENT				3FE	338,100		100,1250	345,431	345,000		337,983		(117)	6.500	5.950		1,744	1,682	10/23/2009	10/13/2015
003924-AH-0	ABITIBI CONSOLIDATED INC DEB	A			6*	427,500		14,5000	826,500	5,700,000		435,895		8,132	8.850	117.723	FA	252,225		01/29/2007	08/01/2030
009037-AM-4	AINSWORTH LUMBER 144A	A	1		5FE	571,179		62,1250	1,049,555	1,689,425		552,975		(18,563)	11,000	4.873	JD	516	212,125	12/30/2009	07/29/2015
012873-AH-8	ALBERTA ENERGY BONDS	A			2FE	9,899,900		120,5190	12,051,900	10,000,000		9,946,500		968	8.125	8.179	MS	239,236	812,500	09/12/2000	09/15/2030
013716-AP-0	ALCAN ALUMINUM UNSEC'D DEBS	A			2FE	9,405,165		104,9150	8,917,792	8,500,000		8,657,128		(124,193)	6.450	4.846	MS	161,429	548,250	01/30/2003	03/15/2011
013716-AU-9	ALCAN ALUMINUM BONDS	A			2FE	1,976,140		101,7010	2,034,012	2,000,000		1,978,206		388	6.125	6.213	JD	5,444	122,500	12/03/2003	12/15/2033
013716-AV-7	ALCAN INC BASIC	A			2FE	11,891,160		102,6660	12,319,860	12,000,000		11,934,357		10,280	5.000	5.117	JD	50,000	600,000	05/25/2005	06/01/2015
013716-AW-5	ALCAN ALUMINUM BASIC	A			2FE	9,079,800		96,8810	9,688,130	10,000,000		9,103,198		13,671	5.750	6.474	JD	47,917	575,000	04/18/2008	06/01/2035
01660N-AA-6	ALGOMA ACQUISITION CORP SERIES 144A	A	1		5FE	1,047,200		85,1250	1,591,838	1,870,000		1,071,268		24,068	9.875	8.440	JD	8,207	184,663	06/13/2007	06/15/2015
01877K-AC-7	ALLIANCE PIPELINE LP BONDS 144A	A			2FE	9,419,963		114,1300	10,305,939	9,030,000		9,339,924		(15,652)	7.877	7.441	JD	711,293		01/28/2004	12/31/2025
01877K-AD-5	ALLIANCE PIPELINE LP BONDS (144A)	I	2		2FE	2,722,819		95,7920	2,608,243	2,722,819		2,722,819			4.591	4.591	JD	347	125,005	05/20/2003	12/31/2025
032479-AC-1	ANADARKO FINANCE CO	A			2FE	14,122,385		105,6730	13,209,150	12,500,000		12,811,814		(221,833)	6.750	4.792	MN	140,625	843,750	10/30/2003	05/01/2011
046828-AA-7	ATHABASCA OIL SANDS INV SR NTS 144A	A			2FE	20,564,016		106,6780	17,015,203	15,950,000		19,852,743		(127,521)	8.200	5.917	AO	326,975	1,307,900	06/16/2003	04/01/2027
078149-DP-3	BELL CANADA DEBS	A			2FE	2,468,280		106,1910	2,123,822	2,000,000		2,038,733		(46,533)	9.500	6.918	AO	40,111	190,000		

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
136385-AN-1	CANADIAN NATL RESOURCES	A			2FE	10,923,600	107.4710	10,747,070	10,000,000	10,916,863		(6,737)			5.900	4.532	FA	245,833		12/01/2009	02/01/2018
136420-AF-3	CANADIAN OCCIDENTAL PETROLEUM NOTES	A			2FE	18,768,315	95.5570	18,633,557	19,500,000	15,160		7.400			7.400	7.730	MN	240,500	1,443,000	01/05/2001	05/01/2028
13643E-AA-3	CANADIAN OIL SANDS NTS 144A	A			2FE	5,876,500	112.6770	5,633,830	5,000,000	5,675,995		(38,440)			7.900	6.250	MS	131,667	395,000	11/25/2003	09/01/2021
136440-AL-8	CANADIAN PACIFIC LTD DEBS	A			2FE	3,468,770	130.5150	3,262,868	2,500,000	3,239,211		(43,532)			9.450	5.890	FA	98,438	236,250	03/30/2004	08/01/2021
136454-AB-1	CDN PAC RAIL CO PTC SER 97-A2	A			2FE	1,000,000	106.1190	1,061,194	1,000,000	1,000,000					7.650	7.650	JAN	73,950	76,500	01/14/1997	01/13/2014
13645R-AF-1	CANADIAN PACIFIC RR	A			2FE	44,566,880	94.9420	43,673,320	46,000,000	44,615,357		18,918			5.950	6.179	MN	349,728	2,737,000	08/28/2007	05/15/2037
30217V-AC-1	EXPRESS PIPELINE LP SUB NTS 144A SER B	A	2		2FE	8,001,083	106.1970	7,981,767	7,516,000	7,778,341		(35,219)			7.390	6.449	JD	1,543	555,432	03/03/2003	12/31/2017
41754W-AB-7	Harvest Operations CORP	A	1		5FE	1,286,250	101.5000	1,314,425	1,295,000	1,292,063		1,475			7.875	8.014	AO	21,529	101,981	09/06/2005	10/15/2011
448096-AE-7	HUSKY OIL LTD SR DEBS	A			2FE	8,654,490	112.8310	9,889,602	8,765,000	8,698,414		6,695			7.550	7.690	MN	84,558	661,758	07/20/2000	11/15/2016
496902-AB-3	KINROSS GOLD CORP Series 144A	A	1		3	1,233,711	104.1250	1,379,656	1,325,000	1,236,926		3,215			1.750	2.193	MS	6,827	22,094	03/23/2009	03/15/2028
496902-AD-9	KINROSS GOLD CORP	A	1		3	251,122	104.1250	260,313	250,000	251,218		96			1.750	1.108	MS	1,288	438	12/21/2009	03/20/2013
552697-AD-6	MDC PARTNERS INC 144A	A	1		4FE	476,680	104.0000	520,000	500,000	477,090		410			11.000	12.000	MN	10,389		10/20/2009	11/01/2016
669771-AR-8	NOVA GAS TRANSMISSION LTD NOTES	A			1FE	4,961,100	115.7240	5,786,220	5,000,000	4,989,497		3,006			8.500	8.582	JD	18,889	425,000	12/15/1992	12/15/2012
669771-AS-6	NOVA GAS TRANSMISSION LTD DEBS	A			1FE	14,114,440	119.5640	16,738,946	14,000,000	14,079,758		(3,554)			7.875	7.804	AO	275,625	1,102,500	07/29/1993	04/01/2023
669771-AH-2	NOVA CHEMICALS CORP	A			4FE	961,226	91.5000	878,400	960,000	960,000		(364)			3.649	7.633	MN	4,598	49,885	02/10/2006	11/15/2013
66987E-AA-5	NOVAGOLD RESOURCES INC BASIC	A			5	427,594	92.3750	484,969	525,000	429,336		3,170	122,031		5.500	4.449	MN	4,812	28,875	07/21/2008	05/01/2015
71644E-AB-8	PETRO-CANADA DEBS	A			2FE	16,526,650	128.2010	20,512,160	16,000,000	16,367,262		(17,185)			9.250	8.930	AO	312,444	1,480,000	09/02/1992	10/15/2021
71644E-AE-2	PETRO-CANADA DEBS	A			2FE	4,975,500	115.8540	5,792,690	5,000,000	4,980,868		552			7.875	7.917	JD	17,500	393,750	06/25/1996	06/15/2026
725906-AN-1	PLACER DOME INC NTS	A			2FE	2,989,470	102.6500	3,079,488	3,000,000	2,990,277		144			6.450	6.476	AO	40,850	193,500	10/07/2003	10/15/2035
73755L-AB-3	POTASH CORP OF SASKATCHEWAN NOTES	A			2FE	7,347,106	108.4100	7,572,418	6,985,000	7,057,945		(48,974)			7.750	6.952	MN	46,615	541,338	02/27/2003	05/31/2011
73755L-AC-1	POTASH CORP OF SASKATCHEWAN NOTES	A			2FE	2,672,360	105.6180	2,911,897	2,757,000	2,732,617		9,461			4.875	5.296	MS	44,801	134,404	11/05/2003	03/01/2013
73755L-AE-7	POTASH CORP-SASKATCHEWAN	A			2FE	22,668,420	107.4600	22,566,684	21,000,000	22,610,903		(57,517)			5.250	3.348	MN	140,875	594,125	10/30/2009	05/15/2014
73755L-AF-4	POTASH CORP-SASKATCHEWAN	A			2FE	21,308,247	110.7550	20,952,688	18,918,000	21,284,525		(23,722)			6.500	4.824	MN	157,125	245,194	11/30/2009	05/15/2019
748ESC-AC-4	Quebecor Notes	A			6*		0.0000		8,000,000						4.875	0.000	MN			09/03/2009	11/12/2039
878742-AM-7	TECKCOMINCO LTD W1	A			3FE	370,902	116.5000	431,050	370,000	370,902					10.250	10.192	MN	4,846	19,700	08/19/2009	05/15/2016
87971M-AC-7	TELLUS CORPORATION NTS	A			2FE	4,065,306	108.2600	3,786,945	3,498,000	3,786,522		(86,728)			8.000	5.228	JD	23,320	279,840	04/28/2004	06/01/2011
884903-BA-2	THOMSON CORPORATION BASIC	A			1FE	7,401,000	109.4710	8,210,333	7,500,000	7,418,357		17,357			5.950	6.298	JJ	205,771	223,125	02/26/2009	07/15/2013
884903-BB-0	THOMSON CORPORATION BASIC	A			1FE	43,478,628	113.0250	48,770,115	43,150,000	43,450,161		(24,544)			6.500	6.393	JJ	1,293,301	2,999,524	08/19/2008	07/15/2018
887147-AD-8	TIMBERWEST FOREST CRP	C			2FE	3,819	129.0000	3,753	2,909	4,232		(252)			9.000	1.658	JAUO	56	155	10/15/2009	02/11/2014
893526-BY-8	TRANS CANADA PIPELINES LTD DEB	A			1FE	21,430,290	134.3000	27,330,111	20,350,000	21,080,393		(38,377)			9.875	9.339	JJ	1,004,781	2,009,563	06/30/1994	01/01/2021
LN2572-27-6	STRATOS GLOBAL Bank Loan	A			3FE	688,749	97.6670	688,106	704,545	696,219		3,570			2.751	0.539	MJSD	54	24,215	12/19/2007	02/13/2012
LN3627-44-2	Telesat Canada Inc.	A			4FE	831,435	95.3570	809,862	849,294	835,170		(3,112)			3.240	0.314		76	38,978	10/05/2009	10/23/2014
LN3627-48-3	Telesat Canada Inc.	A			4FE	71,413	95.3570	69,560	72,947	72,060		(1,382)			3.240	0.451	MON	13	2,709	10/05/2009	10/23/2014
PP6K14-KE-7	MAPLE LEAF FOODS PRIVATE PLACEMENT	A			3	21,000,000	104.3200	21,907,200	21,000,000	21,000,000					5.210	5.210	JD	69,901	1,094,100	11/16/2004	12/08/2011
002920-AC-0	ABBEEY NATIONAL PLC UNSEC'D SUB NTS	F			1	16,811,620	111.9170	15,668,436	14,000,000	16,490,207		(61,599)			7.950	6.358	AO	200,958	1,113,000	06/09/2004	10/26/2029
03512Q-AA-5	Anglogold Holdings 144A	F			2	616,250	113.0000	678,000	600,000	614,705		(1,545)			3.500	2.898	MN	2,275	10,500	07/02/2009	05/22/2014
04519D-AA-5	ASIA ALUMINUM HOLDINGS L 144A	F			6	80,500	15.6250	179,688	1,150,000	80,500		1,267	1,050,342		8.000	8.690	JD			02/08/2006	12/23/2011
049255-AG-7	ATLAS COPCO AB 144A	F			1FE	15,428,941	100.8160	15,841,187	15,713,000	15,465,914		26,044			5.600	5.865	MN	95,326	879,928	09/20/2008	05/22/2017
054536-AA-5	AXA SA SUB NOTES	F			1FE	14,956,800	116.2060	17,430,870	15,000,000	14,961,072		648			8.600	8.627	JD	57,333	1,290,000	12/08/2000	12/15/2030
054540-AC-4	BHP FINANCE USA DEBS	F			1FE	988,550	116.8950	1,168,945	1,000,000	996,964		882			8.500	8.620	JD	7,083	85,000	12/18/1992	12/01/2012
054541-AG-3	BHP BILLITON FIN USA LTD	F			1FE	8,304,375	109.6830	8,226,233	7,500,000	8,284,312		(20,063)			5.500	2.867	AO	103,125		11/17/2009	04/01/2014
05565Q-BJ-6	BP Capital PLC	F			1FE	34,008,612	102.2530	34,868,273	34,100,000	34,014,541		5,929			4.750	4.784	MS	499,423	809,875	03/05/2009	03/10/2019
125182-AA-3	CEVA GROUP PLC CEVA GROUP PLC 144A	F			5FE	666,650	95.0000	636,500	670,000	667,341		428			10.000	10.109	MS	22,333	67,000	08/01/2008	09/01/2014
126168-AB-9	CRA FINANCE LTD NOTES	F			2FE	994,200	106.5560	1,065,560	1,000,000	998,157		395			7.125	7.180	JD	5,938	71,250	12/02/1993	12/01/2013
143658-AN-2	CARNIVAL CORP	F			2FE	720,688	103.1250	773,438	750,000	722,172		1,484			2.000	2.373	AO	3,167	10,250	08/20/2009	04/15/2021
15114V-AA-0	CELL C PTY LTD 144A	F	1		5FE	46,125	99.0000	49,500	50,000	47,180		340			11.000	12.447	JD	2,750	5,500	06/06/2006	07/01/2015
189909-AA-2	CMA CGM SA Series 144A	F	1		3FE	80,000	63.0000	50,400	80,000	80,000					7.250	7.250	FA	2,417	5,800	02/03/2006	02/01/2013
204386-AL-0	CIE GEN GEOPHYSIQUE 144A	F	1		3FE	484,760	107.0000	535,000	500,000	485,589		829			9.500	10.125	MN	6,069	20,583	06/02/2009	05/15/2016
20444P-AA-4	COMP DE DESARROLLO AEROPU SR NOTES 144A	F																			

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest				Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	N A I C D e s.	A c t u a l C o s t	R a t e U s e d t o O b t a i n F a i r V a l u e	F a i r V a l u e	P a r V a l u e	B o o k / A d j u s t e d C a r r y i n g V a l u e	U n r e a l i z e d V a l u a t i o n I n c r e a s e / ( D e c r e a s e )	C u r r e n t Y e a r ' s ( A m o r t i z a t i o n ) A c c r e t i o n	C u r r e n t Y e a r ' s O t h e r T h a n T e m p o r a r y I m p a i r m e n t R e c o g n i z e d	T o t a l F o r e i g n E x c h a n g e C h a n g e i n B o o k / A d j u s t e d C a r r y i n g V a l u e	R a t e o f	E f f e c t i v e R a t e o f	W h e n P a i d	A d m i t t e d A m o u n t D u e a n d A c c r u e d	A m o u n t R e c e i v e d D u r i n g Y e a r	A c q u i r e d	M a t u r i t y
302203-AA-2	Expro Finance Luxembourg Series 144A	F			4FE	548,380		99,2500	565,725	570,000		548,514		134	8.500	9.230	JD	1,346	768,750	12/14/2009	12/15/2016
30239X-AC-1	Fosters Fin Corp Series 144A	F			2FE	14,928,600		103,5060	15,525,915	15,000,000		14,956,276		6,776	5.125	5.187	JD	34,167		06/21/2005	06/15/2015
30250B-AC-3	FMG FINANCE PTY LTD SERIES 144 A	F			4FE	1,855,000		110,6250	2,052,094	1,855,000		1,855,000			10.625	10.625	MS	65,698	197,094	08/11/2006	09/01/2016
35177P-AK-3	FRANCE TELECOM UNSEC'D NTS (Rtng-Adj Cpn)	F			1FE	3,619,770		107,1770	3,215,310	3,000,000		3,115,808		(95,188)	7.750	4.308	MS	77,500	232,500	02/19/2004	03/01/2011
35177P-AL-1	FRANCE TELECOM UNSEC'D NTS (Rtng-AdjCpn)	F			1FE	6,618,650		133,0810	6,654,070	5,000,000		6,449,910		(33,153)	8.500	6.052	MS	141,667	425,000	02/19/2004	03/01/2031
36318M-AA-0	Galaxy Entertainment Series 144A	F			4FE	227,700		100,0000	345,000	345,000		240,478		12,778	9.875	8.922	JD	1,514	34,069	12/07/2005	12/15/2012
37932J-AB-9	GLOBAL CROSSING LTD 144A	F			4FE	695,402		109,7500	779,225	710,000		696,652		1,250	12.000	12.451	MS	23,430		09/17/2009	09/15/2015
4041A2-AF-1	HBOS PLC NTS 144A	F			2FE	4,715,400		75,5130	3,775,660	5,000,000		4,737,867		4,567	6.000	6.433	MN	50,000	300,000	06/17/2004	11/01/2033
404280-AF-6	HSBC Holdings PLC	F			1FE	6,776,155		106,3670	6,190,554	5,820,000		6,707,570		(17,660)	7.625	6.340	MN	54,239	443,775	08/25/2005	05/17/2032
434808-AA-9	HOLDEN FUNDING CORP SEC GTD AMORT NTS 144A (AMBAC)	F			5FE	4,003,219		64,2280	2,601,627	4,050,611		4,012,190		875	7.345	7.449	MN	49,586	297,517	11/01/1995	11/01/2035
45661Y-AA-8	INEOS GROUP HOLDINGS PLC 144A	F			5FE	57,500		67,2500	672,500	1,000,000		60,131		3,304	8.500	7.354	FA	32,111	85,000	05/04/2006	02/15/2016
45687A-AA-0	INGERSOLL-RAND GL HLD CO BASIC	F			2FE	24,964,250		110,8400	27,709,900	25,000,000		24,967,863		2,653	6.875	6.895	FA	649,306	1,718,750	08/13/2008	08/15/2018
45687A-AB-8	INGERSOLL-RAND GL HLD CO BASIC	F			2FE	5,997,420		107,9770	6,478,590	6,000,000		5,998,057		467	6.000	6.010	FA	136,000	360,000	08/13/2008	08/15/2013
45820E-AB-8	INTL TELECOM SATELLITE UNSEC'D NTS	F			5FE	5,572,875		99,0000	6,687,450	6,755,000		6,210,909		197,216	7.625	10.770	AO	108,737	515,069	07/30/2003	04/15/2012
500472-AB-1	PHILIPS ELECTRONICS NV	F			1FE	50,045,420		106,4060	53,735,030	50,500,000		50,103,185		36,066	5.750	5.872	MS	887,257	2,903,750	02/04/2009	03/11/2018
592664-AA-4	METROPOLITANO DE LISBOA Series 144A	F			1FE	1,400,000		111,5300	1,561,420	1,400,000		1,400,000			7.420	7.420	AO	21,930	103,880	10/02/1996	10/15/2016
597433-AD-3	MIDLAND BANK PLC UNSEC'D SUB NTS	F			1FE	3,416,430		104,3000	3,129,009	3,000,000		3,076,197		(60,288)	6.950	4.748	MS	61,392	208,500	08/12/2003	03/15/2011
636274-AC-6	NATL GRID PLC	F			2FE	21,421,570		108,7550	22,838,592	21,000,000		21,161,114		(80,586)	6.300	5.866	FA	551,250	1,165,500	02/10/2009	08/01/2016
64016A-AA-3	BASELL AF SCA 144A	F			6*	12,500		19,0000	95,000	500,000		14,351		40	8.375	287,515	FA			06/15/2006	08/15/2015
686200-00-7	Singet Group PLC	F			2	10,318,000		104,3540	10,767,246	10,318,000		10,318,000			8.110	6.110	MN	88,328	828,195	03/02/2006	05/23/2016
686870-00-7	ROLLART MEDIA GROUP	F			3	7,056,066		107,2610	7,568,407	7,056,066		7,056,066			7.180	7.180	AO	91,474	569,103	03/31/2006	04/26/2014
686900-00-2	QUINN GROUP UNLIMITED	F			2	17,000,000		100,3040	17,051,680	17,000,000		17,000,000			6.110	6.110	AO	190,428	1,038,700	03/31/2006	04/25/2013
687680-00-9	FOUR SEAS	F			1FE	25,000,000		108,7710	27,192,750	25,000,000		25,000,000			7.165	7.234	MJSD	4,976	1,791,250	06/28/2006	03/19/2012
688380-00-5	CEMENTOS DE CHIHUAHUA	F			2	10,925,000		94,0000	10,269,500	10,925,000		10,925,000			8.740	8.740	JJ	400,504	1,442,869	06/30/2006	07/31/2016
000000-00-0	VITOL	F			2	5,600,000		103,7580	5,810,448	5,600,000		5,600,000			6.130	6.130	MN	50,538	343,280	10/05/2006	11/08/2011
694860-00-8	ROYAL VOPAK	F			2	4,000,000		101,2300	4,049,200	4,000,000		4,000,000			6.140	6.140	JD	8,187	245,600	04/17/2007	06/19/2022
705006-AB-0	PEARSON DOLLAR FIN PLC 144A	F			2FE	4,904,150		105,5850	5,279,270	5,000,000		4,904,109		11,527	5.700	6.013	JD	23,750	285,000	09/14/2006	06/01/2014
705015-AA-3	PEARSON PLC (U.K.) UNSEC'D SR NTS 144A	F			2FE	18,739,707		105,8960	17,414,597	16,445,000		16,982,434		(349,670)	7.000	4.648	JD	51,162	1,151,150	08/13/2004	06/15/2011
706448-BK-2	PEMEX FINANCE LTD SER 00-1 CL A1	F			1FE	855,158		103,0000	798,250	775,000		784,170		(7,023)	9.030	7.110	FIAN	8,942	69,982	02/06/2002	02/15/2011
75902A-AA-6	REGIONAL DIVERSIFIED FUNDING Series 144A	F			6FE	18,485,912		35,0000	6,617,101	18,906,004		6,617,101		(11,909,193)	9.250	9.475	MS	514,926	1,748,805	03/09/2000	03/15/2030
767201-AC-0	RIO TINTO FIN USA LTD BASIC	F			2FE	25,090,100		109,8480	27,462,000	25,000,000		25,082,108		(6,903)	6.500	6.449	JJ	749,306	1,706,250	07/16/2008	07/15/2018
767201-AE-6	RIO TINTO FIN USA LTD BASIC	F			2FE	4,413,550		107,9040	5,395,185	5,000,000		4,536,117		107,300	5.875	8.995	JJ	135,451	308,438	11/05/2008	07/15/2013
78572M-AA-3	SABMILLER PLC Series 144A	F			2FE	27,004,560		102,2210	24,532,920	24,000,000		26,792,593		(54,988)	6.625	5.720	FA	600,667	1,590,000	11/16/2005	08/15/2033
78572M-AD-7	SABMILLER PLC SABMILLER PLC 144A	F			2FE	17,393,995		109,7000	18,100,500	16,500,000		17,172,694		(83,267)	6.500	5.740	JJ	536,250	1,072,500	04/05/2007	07/01/2016
78572M-AF-2	SABMILLER PLC 144A	F			2FE	5,697,948		109,2910	6,229,576	5,700,000		5,698,144		156	6.500	6.505	JJ	170,842	368,442	07/10/2008	07/15/2018
803070-AB-7	SAPPI PAPIER HOLDING 144A	F			4FE	17,540,352		63,0000	13,041,000	20,700,000		17,665,476		40,913	7.500	9.009	JD	69,000	1,552,500	03/01/2005	06/15/2032
81013T-AB-7	Scottish Power PLC	F			1FE	34,997,550		106,1750	37,161,390	35,000,000		34,998,333		271	5.375	5.376	MS	553,924	1,881,250	03/15/2005	03/15/2015
81180V-AA-1	SEAGATE TECHNOLOGY INTL 144A	F			3FE	857,853		110,5000	994,500	900,000		862,266		4,413	10.000	11.250	MN	15,000	45,000	04/16/2009	05/01/2014
822582-AJ-1	SHELL INTERNATIONAL FIN	F			1FE	9,666,438		98,7990	9,583,464	9,700,000		9,667,196		758	4.300	4.343	MS	114,703		09/15/2009	09/22/2019
826200-AD-9	SIEMENS FINANCIERINGSMAT SERIES 144A	F			1FE	7,679,550		105,9460	7,945,928	7,500,000		7,662,870		(5,636)	6.125	5.918	FA	170,990	459,375	09/20/2006	08/17/2026
858577-AH-2	Stena AB	F			3FE	2,276,875		96,2500	2,165,625	2,250,000		2,257,237		(4,672)	7.500	7.258	MN	28,125	168,750	03/29/2005	11/01/2013
869434-AB-6	SUTTON BRIDGE FIN LTD GTD SEC BNDS 144A	F			2FE	6,924,780		107,4970	7,443,931	6,924,780		6,924,780			7.970	7.970	JD	1,533	551,905	05/29/1997	06/30/2022
87203R-AC-6	SYSTEMS 2001 ASSET TRUST Series 144A	F			2FE	8,869,838		104,1560	9,102,581	8,739,372		8,763,322		(15,027)	7.156	6.924	MJSD	27,795	625,654	05/24/2002	12/15/2011
87927V-AF-5	TELECOM ITALIA CAPITAL	F			2FE	9,950,224		98,5920	9,859,190	10,000,000		9,954,555		792	6.375	6.412	MN	81,458	637,500	10/15/2004	11/15/2033
879385-AC-6	TELEFONICA EUROPE BV GLOBAL	F			1FE	11,741,500		104,6110	10,461,080	10,000,000		10,216,270		(297,212)	7.750	4.577	MS	228,194	775,000	05/04/2004	09/15/2010
879385-AD-4	TELEFONICA EUROPE BV NTS	F			1FE	17,708,840		124,5040	17,430,574	14,000,000		17,319,816		(77,712)	8.250	6.199	MS	340,083	1,155,000	06/28/2004	09/15/2030
881575-AA-2	TESCO PLC																				

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
910200-AA-5	UNITED ENERGY DISTRIBUTION NTS 144A (AMBAC)	F			2FE	4,994,950		102,4270	5,121,330	4,998,954		.772			4.700	4.717	AO	49,611	235,000	11/12/2003	04/15/2011
915436-AE-9	UPM-Kymmene Corp Series 144A	F			3FE	9,176,177		93,8050	8,348,654	9,003,736		(26,826)			5.625	5.196	JD	41,719	468,281	09/09/2005	12/01/2014
915436-AF-6	UPM-Kymmene Corp Series 144A	F			3FE	6,219,262		85,7520	5,376,650	6,233,410		3,498			5.500	5.591	JJ	144,645	344,850	08/03/2005	01/30/2018
92857T-AG-2	VODAFONE GROUP PLC - ADR NEW UNSEC'D NTS	F			1FE	16,536,617		100,7640	14,182,533	14,075,000		(437,470)			7.750	4.519	FA	412,085	1,090,813	12/21/2007	02/15/2010
92857W-AG-5	VODAFONE GROUP PLC	F			1FE	5,594,460		104,8170	6,288,990	6,000,000		5,719,203			5.000	5.981	MS	88,333	300,000	09/06/2006	09/15/2015
92857W-AM-2	VODAFONE GROUP PLC	F			1FE	14,955,450		105,4660	15,819,885	15,000,000		14,987,597			5.500	5.560	JD	36,667	825,000	03/09/2006	06/15/2011
92857W-AP-5	VODAFONE GROUP PLC	F			1FE	3,466,140		106,2170	4,354,889	4,100,000		3,528,102			5.625	8.245	FA	79,438	230,625	11/25/2008	02/27/2017
A8417*-AA-7	.STEIN	F			.2	17,500,000		104,9920	18,373,600	17,500,000		17,500,000			5.020	5.020	MS	258,669	878,500	02/04/2005	03/15/2012
BL5073-41-8	Warner Chilcott	F			4FE	77,186		100,0780	78,027	77,966		.30			0.070	0.267		12		10/14/2009	10/30/2014
BL5073-49-1	Warner Chilcott Bank Loans	R			4FE	123,498		100,0780	124,842	123,542		.43			0.073	0.252		20	318	10/14/2009	04/30/2015
EF2365-74-2	DDI HOLDING AS 144A	F	1		.4	2,078,842		92,0000	1,912,535	2,078,842		2,078,842			9.300	9.257	JJ	87,397	193,332	01/09/2006	01/19/2012
E60069-37-7	SEVAN MARINE ASA	F			.5	1,000,000		92,0000	1,000,000	1,000,000		1,000,000			9.250	9.250	DEC		92,500	12/15/2006	12/20/2011
F6132F-AA-6	MESSER GROUP	F			.2	482,833		105,8570	511,113	482,833		482,833			5.240	5.240	JJ	10,682	25,300	07/08/2005	08/02/2012
F6132F-AB-4	MESSER GROUP	F			.2	1,578,598		104,1890	1,644,883	1,578,598		1,578,598			5.460	5.460	FA	35,674	86,191	07/08/2005	08/02/2015
F9181F-AF-9	THOMSON S.A.	F			.6	7,279,500		76,5000	11,475,000	15,000,000		6,892,500			8.200	(4.047)	MN		1,140,250	04/12/2006	05/17/2011
G9020*-AA-8	Travis Perkins PLC	F			.2	15,000,000		99,7260	14,958,900	15,000,000		15,000,000			5.770	5.770	JJ	372,646	865,500	12/01/2005	01/26/2013
L6346*-AA-1	Messer Group	F			.2	1,017,167		105,8570	1,076,742	1,017,167		1,017,167			5.240	5.240	JJ	22,504	53,300	07/08/2005	08/02/2012
L6346*-AB-9	Messer Group	F			.2	4,621,402		104,1990	4,815,455	4,621,402		4,621,402			5.460	5.460	FA	104,436	252,329	07/08/2005	08/02/2015
LN2804-18-2	Ineos US Finance ASGN Bank Loan	F			5FE	590,959		90,2500	551,256	610,810		596,605		3,734	7.501	0.544	MS	12,091	45,925	12/11/2007	12/16/2013
LN2804-22-4	Ineos US Finance ASGN Bank Loan	F			5FE	590,896		90,2500	551,197	610,745		595,869		3,544	8.001	0.466	MS	12,895	49,041	12/11/2007	12/16/2014
LN3623-11-0	Flextronics Semiconductor	F			.3Z	1,319,322		92,4170	1,338,974	1,338,474		1,338,474		(27,618)	2.447	0.407		5,732	56,523	10/30/2009	10/01/2014
LN3623-15-1	Flextronics Semiconductor	F			3FE	379,115		92,4170	355,452	384,619		380,767		(6,583)	2.448	0.422	JAJO	2,040	14,920	10/30/2009	10/01/2014
NA281F-AB-9	Koninklijke Cooperatie	F			.2	7,329,576		104,1080	7,834,127	7,525,000		7,425,257		24,654	4.930	5.342	JJ	155,607	370,983	09/12/2005	07/31/2013
G56556-AB-4	LOUGHMANE LTD PRIVATE PLACEMENT	F			.2	15,000,000		106,8660	16,029,900	15,000,000		15,000,000			5.530	5.530	JD	34,563	829,500	10/21/2004	12/16/2012
PP3269-H2-1	OVERSEAS ASSITAN PRIVATE PLACEMENT	F			.2	6,750,000		106,6680	7,200,090	6,750,000		6,750,000			6.810	6.810	MN	60,013	459,675	04/18/2008	05/14/2018
PP3269-B2-9	CEMEX ESPANA FIN PRIVATE PLACEMENT	R			.4	16,553,701		96,7500	17,340,342	16,636,256		17,922,834		82,555	8.910	11.262	MJSD	70,974	1,078,762	09/01/2009	02/14/2014
PP4H11-LG-6	BARILLA FINANCE PRIVATE PLACEMENT	F			.2	2,993,640		106,0760	3,182,280	3,000,000		2,996,853		.697	5.550	5.580	JD	10,175	166,500	11/30/2004	12/09/2013
PP4H11-LH-4	BARILLA FINANCE PRIVATE PLACEMENT	F			.2	5,966,040		105,0310	6,301,860	6,000,000		5,979,125		2,875	5.690	5.760	JD	20,863	341,400	11/29/2004	12/09/2015
PP5D0M-UC-8	NEICREST MINING PRIVATE PLACEMENT	F			.2	20,000,000		106,3680	21,273,600	20,000,000		20,000,000			5.410	5.407	MN	147,272	1,082,000	04/14/2005	05/11/2012
PP6K14-SY-5	CSL FINANCE PTY LTD	F			.2	2,772,981		105,1130	2,838,051	2,700,000		2,730,620		(9,382)	5.300	4.884	JD	4,770	143,100	12/09/2004	12/19/2012
PP6K14-SZ-2	CSL USA, INC	F			.2	1,188,421		105,1130	1,216,308	1,157,143		1,170,266		(4,021)	5.300	4.884	JD	2,044	61,329	12/09/2004	12/19/2012
Q0455*-AK-4	APT Pipelines LTD	F			.2	20,000,000		101,3060	20,261,200	20,000,000		20,000,000			6.140	6.140	MN	156,911	1,228,000	03/29/2007	05/15/2022
Q1403*-AD-5	BLUESCOPE STEEL FINANCE LIMITE PRIVATE PLACEMENT	F			.2	15,000,000		105,9540	15,893,100	15,000,000		15,000,000			6.710	6.710	JD	2,796	1,006,500	06/02/2008	06/30/2018
Q8513*-AA-9	SKY CITY ENTERTAINMENT	F			.2	20,000,000		105,3120	21,062,400	20,000,000		20,000,000			5.170	5.170	MS	304,456	1,034,000	12/09/2004	03/15/2012
X5427F-AA-2	M.J MAILLIS PACKING SYSTEMS	F			.6	4,480,000		32,0000	4,480,000	14,000,000		4,480,000		(128)	8.230	10.619	JD	20,863	85,131	11/14/2005	12/19/2012
844030-AA-4	SOUTHERN UNION CO UNSEC'D SR NTS	F			2FE	10,584,950		105,8510	10,585,120	10,000,000		10,479,313		(19,400)	7.600	7.057	FA	316,667	760,000	04/24/2003	02/01/2024
844030-AC-0	SOUTHERN UNION CO UNSEC'D SR NTS	F			2FE	10,724,100		111,6600	11,166,020	10,000,000		10,649,237		(13,699)	8.250	7.611	MN	105,417	825,000	01/30/2003	11/15/2029
<b>3299999. Industrial and Miscellaneous (Unaffiliated) - Issuer Obligations</b>						<b>9,798,161,665</b>	<b>XXX</b>	<b>10,108,013,049</b>	<b>9,649,959,666</b>	<b>9,680,672,649</b>	<b>(13,188,332)</b>	<b>(17,364,753)</b>	<b>41,806,192</b>	<b>665</b>	<b>XXX</b>	<b>XXX</b>	<b>XXX</b>	<b>158,452,166</b>	<b>561,139,391</b>	<b>XXX</b>	<b>XXX</b>
00077B-7C-1	AMAC SER 2002-10 1A26 (SUB/NAS)	2			.12*	1,597,995		90,5750	1,434,333	1,583,582		1,583,966		(6,925)	5.750	5.587	MON	7,588	91,056	02/13/2003	04/25/2031
000780-JT-4	AMAC SER 2003-8 A24 (PAC)	2			.12*	7,938,424		81,2230	6,366,259	7,838,000		7,886,047		(36,995)	5.500	5.385	MON	35,924	431,090	05/30/2003	06/25/2033
05948X-RE-3	BOA MTGE SEC SER 2003-6 CLASS 1A30	2			.12*	2,689,043		99,9850	2,691,594	2,683,825		2,691,987		(2,484)	4.750	4.750	MON	10,656	127,869	11/15/2004	08/25/2033
05952H-AG-4	BANC OF AMERICA MTG SECURITIES 2007-1 1A7	2			.22*	10,468,387		96,2790	10,033,091	10,420,905		10,405,550		(9,029)	5.750	5.522	MON	49,933	364,718	12/18/2007	10/25/2011
05953Y-AY-7	BANC OF AMERICA FUNDING CORP 2007-4 2A3	2			.12*	11,885,161		86,8180	10,324,093	11,891,664		11,868,538		(6,210)	5.500	5.416	MON	54,503	654,042	05/11/2007	06/25/2037
073905-CR-0	BEAR STEARNS SER 1989 1-E (B-PAC)	2			.12*	179,915		98,5120	188,942	188,751		184,264		.156	8.900	9.579	MON	1,400	16,799	08/04/1989	02/01/2019
12543P-AJ-2	Countrywide Home Loan Mortgage 2006-21 A9	2			.12*	1,260,619		96,2970	1,204,625	1,250,945		1,249,089		(3,740)	5.750	5.594	MON	5,994	171,929	11/26/2007	09/25/2010
12667F-6C-4	Countrywide Alternative Loan T 2005-J2 1A7	2			.12*	9,148,753		47,2700	4,396,129	9,300,000		9,150,185		(6,183)	5.500	5.689	MON	42,625	511,506	02/08/2005	04/25/2035
12669D-4H-8	COUNTRYWIDE HOME LOANS SER 2003-11 A6 (B-PAC/SUB)	2			.12*	7,851,267		95,9080	7,529,954	7,851,267		7,851,267			5.000	4.999	MON	32,714	392,563	04/29/2003	05/25/2033
12669D-R3-4	COUNTRYWIDE HOME LOANS SER 2003-11T1 A1 (BPAC)	2			.12*	7,646,875		72,4300	5,794,384	8,000,000		7,796,992		78,049	4.500	5.013	MON	30,000			

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest				Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
12669E-SV-9	COUNTRYWIDE HOME LOANS SER 2003-28 A4 (PAC-SUB)	2			22*	10,918,000	.88,8390	9,416,913	10,600,000	10,767,121		(88,586)			5.500	5.197	MON	48,583	583,000	07/02/2003	06/25/2033
12669E-ZK-5	COUNTRYWIDE HOME LOANS SER 2003-34 A9 (PAC)	2			12*	278,250	.84,9380	254,813	300,000	288,609		5,629			5.000	5.961	MON	1,250	15,000	12/23/2003	09/25/2033
12669F-F3-2	COUNTRY WIDE HOME LOANS SER 2004-J5 A5 (NAS)	2			12*	12,987,233	.75,2000	10,137,062	13,480,099	13,218,170		116,621			5.500	6.066	MON	61,784	741,405	06/21/2004	07/25/2034
12669F-WJ-8	COUNTRY WIDE HOME LOANS 2004-5 2A14	2			12*	9,605,126	.95,4940	9,172,280	9,605,126	9,605,126					5.000	4.987	MON	40,021	480,256	08/04/2004	05/25/2034
193908-AS-9	CMOT SER 57-D (B-PAC)	2			12*	68,965	.107,6560	75,664	70,283	69,709		(40)			9.900	10.342	MON	580	6,958	04/26/1989	02/01/2019
19390Q-AF-7	CMOT SER 46 C (B-TAC)	2			12*	14,477	.109,6560	16,434	14,987	14,820		(30)			9.500	10.185	MON	119	1,424	08/05/1988	09/01/2018
22541N-W7-0	CSFB MTGE SECURITIES CORP SER 2003-8 3A25 (B-PAC)	2			12*	1,546,297	.59,0740	910,327	1,541,000	1,537,330		(7,625)			5.500	5.449	MON	7,063	84,755	05/20/2003	07/25/2011
22541Q-BT-8	CSFB MTGE SECURITIES CORP SER 2003-11 1A32 (B-PAC)	2			12*	2,293,898	.71,9160	1,635,370	2,274,000	2,279,762		(10,728)			5.500	5.415	MON	10,423	125,070	05/21/2003	04/25/2033
22541Q-ZN-5	CSFB MTGE SECURITIES CORP SER 2003-25 1A9 (ACRL)	2			12*	1,878,382	.85,9130	1,777,586	2,069,061	1,933,551		63,453			5.500	6.750	MON	9,483	110,457	12/01/2009	10/25/2033
32051D-X4-9	FIRST HORIZON ASSET SECURITIES 2004-2 1A6	2			12*	2,051,697	.99,1850	2,031,157	2,047,857	2,043,983		(6,207)			6.000	5.662	MON	10,239	122,871	04/11/2006	02/25/2011
32051D-XY-3	FIRST HORIZON ASSET SECURITIES SER 2003-5 1A5 (ACRL)	2			12*	3,773,491	.100,4330	3,828,395	3,811,882	3,794,477		19,790			5.250	5.459	MON	16,677	194,547	12/01/2009	07/25/2033
32051G-N5-0	FIRST HORIZON MTG PASS-THROUGH 2005-8 1A3	2			12*	888,492	.94,3190	832,214	882,340	880,065		(5,426)			5.750	5.248	MON	4,228	50,735	11/18/2005	05/25/2010
36185N-K9-0	GMAC MTG CORP LOAN SER 2003-J9 A8 (ACRL-NAS)	2			12*	9,869,891	.75,8230	8,009,458	10,563,391	10,102,487		228,274			5.500	6.433	MON	48,416	564,042	12/01/2009	01/25/2034
36185N-L5-7	GMAC MTG CORP LOAN SER 2003-J9 A12 (VADM-NAS)	2			12*	8,114,250	.93,6720	7,364,866	7,862,407	7,923,951		(78,031)			5.500	4.087	MON	36,036	432,432	04/19/2004	11/25/2011
36185N-UY-4	GMAC MTG CORP LOAN SER 2002-J7 A7 (SUPP) MBIA	2			12*	209,376	.94,9700	196,633	207,047	207,609		(744)			5.750	5.450	MON	992	11,905	05/07/2003	12/25/2030
45660N-QI-8	RESIDENTIAL ASSET SECURITIZATI SER 2003-A6 A6 (ACRL-SUB)	2			12*	9,602,372	.90,7290	8,789,040	9,687,134	9,617,736		25,133			5.500	5.648	MON	44,399	517,253	12/01/2009	07/25/2033
46630G-BC-8	JP MORGAN MORTGAGE TRUST MASTR ASSET SECURITIZATION TRU SER 2003-1 2A13 (ACRL)	2			12*	5,604,626	.96,0530	5,423,878	5,646,756	5,616,123		4,327			5.290	5.512	MON	24,895	124,522	01/09/2007	07/25/2035
55265K-QH-5	RFSC SER 2003-RM2 A16 (PAC)	2			12*	1,628,368	.86,9460	1,486,123	1,709,254	1,675,084		43,548			5.750	6.604	MON	8,190	95,243	12/01/2009	02/25/2033
760985-VA-6	RESIDENTIAL ACCREDIT LOANS INC SER 2003-0S11 A8 (SEQ)	2			22*	6,572,964	.81,6380	5,266,448	6,451,000	6,523,436		(33,899)			5.500	5.342	MON	29,567	354,506	05/16/2003	04/25/2033
76110H-EQ-8	RESIDENTIAL ACCREDIT LOANS INC 2003-QS22 A3	2			12*	3,416,999	.56,1090	1,923,971	3,429,000	3,416,997					5.250	5.308	MON	15,002	180,023	06/12/2003	06/25/2033
76110H-MX-4	WASHINGTON MUTUAL SER 2003-S5 1A19 (PAC-SUB)	2			12*	1,983,751	.96,7260	1,926,628	1,991,843	1,984,033		180			5.375	5.451	MON	8,922	107,062	12/01/2005	12/26/2033
929227-2X-3	WASHINGTON MUTUAL SER 2004-CB1 3A3 (ACRL)	2			12*	2,192,641	.73,7700	1,738,159	2,294,000	2,193,013		(6,950)	111,446		5.500	6.186	MON	10,514	126,170	05/21/2003	06/25/2033
92922F-RE-0	WASHINGTON MUTUAL SER 2004-CB1 3A3 (ACRL)	2			12*	5,223,442	.79,9750	4,678,286	5,849,656	5,220,008		(10,160)	(221,329)		5.500	6.229	MON	26,811	312,302	12/01/2009	06/25/2034
949761-AC-4	WELLS FARGO MBS TRUST SER 2003-11 1A3 (PAC-SUB)	2			12*	3,266,070	.99,9940	3,235,550	3,235,735	3,228,392		(5,601)			4.750	4.554	MON	12,808	153,744	10/14/2003	09/25/2010
<b>3499999. Industrial and Miscellaneous (Unaffiliated) - Defined Multi-Class Residential Mortgage-Backed Securities</b>						203,657,222	XXX	177,459,776	205,686,746	203,749,298		332,312	64,246		XXX	XXX	XXX	921,492	10,549,040	XXX	XXX
02149D-AJ-8	Countrywide Alt. Loan Trust Series 2006-HY13 Class 3A1	2			12*	13,075,372	.66,8600	10,559,854	15,793,884	13,077,997		(25,437)	2,755,504		5.911	7.310	MON	77,803	757,466	12/29/2006	01/25/2047
026710-AE-3	AMERICAN HSG TRUST II 1-D	2			12*	594,438	.99,7260	702,585	704,519	653,510		4,217			8.300	10.262	MON	4,873	58,367	10/05/1990	12/25/2018
05946X-X8-1	Banc of America Funding Corp 2005-8 2A1	2			12*	2,007,553	.96,6840	1,951,046	2,017,958	2,009,212		1,052			5.500	5.626	MON	9,249	110,988	12/02/2005	01/25/2036
05952F-AE-3	BANC OF AMERICA MORTGAGE 2007-2 A5	2			12*	17,172,939	.92,8520	18,832,928	20,282,738	17,185,778		186,536	3,060,185		5.500	29.223	MON	92,963	1,110,142	04/04/2007	05/25/2037
12545C-AD-2	COUNTRYWIDE HOME LOANS SERIES 2007-10 CLASS A4	2			12*	12,872,641	.66,2600	10,071,550	15,200,000	12,907,021		184,079	1,533,639		5.500	7.630	MON	69,667	835,917	03/26/2008	07/25/2037
126694-JT-6	COUNTRYWIDE HOME LOANS 2005-24 A3	2			12*	24,507,035	.75,9540	18,988,375	25,000,000	24,547,856		41,853			5.500	5.855	MON	114,583	1,374,971	10/17/2005	11/25/2035
126694-TX-6	COUNTRYWIDE HOME LOANS 2005-30 A8	2			12*	15,760,108	.73,9970	12,087,459	16,335,000	15,914,878		60,918			5.500	5.967	MON	74,869	805,612	12/05/2005	01/25/2036
126694-W4-6	COUNTRYWIDE HOME LOANS 2006-9 A3	2			12*	12,578,751	.66,5910	8,848,372	13,287,600	12,554,694		(39,846)	774,476		6.000	5.627	MON	66,438	752,426	03/01/2006	05/25/2036
126694-W7-9	COUNTRYWIDE HOME LOANS 2006-9 A6	2			12*	14,621,308	.39,8980	6,458,721	16,188,000	14,619,380		(1,760)	1,537,877		6.000	6.652	MON	80,940	971,268	03/01/2006	05/25/2036
126694-X5-2	COUNTRYWIDE HOME LOANS 2006-9 A12	2			12*	7,647,295	.58,6230	4,725,592	8,061,000	7,636,202		(16,377)	434,688		6.000	5.798	MON	40,305	466,160	03/14/2006	05/25/2036
12669G-2V-2	Countrywide Home Loans 2005-16 A3	2			12*	13,230,050	.70,0700	9,606,624	13,710,000	13,385,356		72,537			5.500	6.005	MON	62,838	703,275	11/09/2005	09/25/2035
16162Y-AE-5	CHASE 2006-S4	2			12*	10,300,688	.80,2350	8,244,115	10,275,000	10,264,991		(14,248)			6.000	5.930	MON	51,375	616,476	12/07/2006	01/25/2014
161630-BX-5	CHASE MORTGAGE FINANCE CORP 2007-A1 12A1	2			12*	2,317,117	.81,8660	2,011,107	2,456,572	2,317,991		(1,358)	133,732		5.944	13.973	MON	12,168	145,798	02/28/2007	03/25/2037
17025A-AL-6	Countrywide Home Loans 2006-17 A11	2			12*	4,581,107	.24,4580	2,510,968	10,266,364	4,382,688		(198,419)			6.000	17.683	MON	51,332	547,977	12/01/2009	12/25/2036
172973-AJ-5	CITICORP MTG SEC INC 2005-8 2A3	2			12*	1,062,359	.84,3140	927,457	1,100,000	1,079,522		40			5.000	5.581	MON	4,583	13,750	01/26/2006	11/25/2020
32056F-AA-0	FIRST HORIZON MORTGAGE PASS-TH SERIES 20075 CLASS A1	2			12*	3,104,842	.82,0940	2,955,353	3,599,971	3,173,098		49,580			6.250	11.342	MON	18,750	224,998	09/10/2008	11/25/2037
32056F-AD-4	FIRST HORIZON MORTGAGE PASS-TH SERIES 20075 CLASS A4	2			12*	8,085,888	.77,0940	8,326,062	10,799,912	8,090,035		182,371	1,184,873		6.250	19.198	MON	56,250	674,960	08/08/2008	11/25/2037
362636-AM-4	GSR MORTGAGE LOAN TRUST SERIES 20072F CLASS 2A7	2			12*	11,842,352	.73,0510	8,802,559	12,049,931	11,875,420		21,880			5.750	6.024	MON	57,739	683,431	11/01/2007	02/25/2037
46630P-AP-0	JP MORGAN MORTGAGE TRUST 2007-A2 3A1	2			12*	3,794,965	.85,8580	3,264,961	3,802,763	3,791,236		(860)			5.815	5.815	MON	18,429	157,111	12/18/2007	04/25/2037
46630U-AC-8	JP Morgan Mortgage Trust 2007-A3 2A1	2			12*	10,659,012	.77,5520	9,173,125	11,828,384	10,615,520		(45,595)	1,151,911		5.755	3.252	MON	56,725	684,881	04/30/2007	05/25/2037

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
55274S-AK-7	MASTER ASSET SECURITIZATION 2006-3 1A10	2			22*	21,022,143	.85	9350	17,971,273	20,912,733	20,916,222		(44,348)		6.000	5.628	MON	104,564	1,226,394	01/11/2007	04/25/2012
74957E-AR-8	RESIDENTIAL FUNDING MTG 2006-S5 A16	2			22*	28,595,611	.82	2790	23,491,392	28,551,000	28,489,635		(51,830)		6.000	5.926	MON	142,755	1,713,060	01/02/2007	10/25/2012
76110V-RC-4	RESIDENTIAL FUNDING MTG 2005-H11 A4	2			12*	73,999	.97	6980	73,191	74,915	74,047		(378)		4.700	4.839	MON	293	3,521	04/13/2007	08/25/2034
94984H-AA-3	Wells Fargo Series 2006-12 A1	2			12*	4,870,803	.97	1410	4,705,771	4,844,294	4,838,067		(10,373)		6.000	5.567	MON	24,221	273,913	10/06/2006	02/25/2011
94984H-AD-7	Wells Fargo 2006-12 A4	2			12*	8,778,656	.73	0440	6,573,969	9,000,000	8,800,296		11,746		6.000	6.275	MON	45,000	539,892	09/15/2006	10/25/2036
3599999. Industrial and Miscellaneous (Unaffiliated) - Other Multi-Class Residential Mortgage-Backed Securities						253,156,886	XXX	201,864,409	276,142,538	253,200,652		365,980	12,566,885		XXX	XXX	XXX	1,338,712	15,453,204	XXX	XXX
05952C-AA-8	BANC OF AMERICA COMMERCIAL MOR SERIES 20075 CLASS A1	2			1FE	10,391,844	.102	3910	10,881,447	10,627,347	10,440,621		48,777		5.175	6.626	MON	45,830	320,813	05/05/2009	02/10/2051
05952C-AE-0	BANC OF AMERICA COMMERCIAL MOR SERIES 2007-5 CLASS A4	2			1FE	8,070,898	.84	3630	7,255,218	8,600,000	8,153,222		45,368		5.492	6.439	MON	39,359	472,312	02/08/2008	02/10/2051
05955F-AA-8	BANC OF AMERICA LARGE LOAN 2009-UB1	2			1FE	9,117,969	.9	8080	9,988,902	11,000,000	9,209,130		91,161		5.615	5.926	MON	51,474	259,723	07/02/2009	06/24/2050
07383F-SJ-3	BEAR STEARNS COMM'L MTGE SER 2005-T18 A/B	2			1FE	5,454,604	.100	9480	5,476,445	5,425,000	5,430,565		(5,595)		4.823	4.751	MON	21,804	261,648	04/19/2005	04/13/2014
07383F-X2-9	BEAR STEARNS COMM'L MTGE SER 2004-PWR6 A3	2			1FE	13,317,591	.99	7480	13,316,331	13,350,000	13,318,271		15,972		4.355	4.528	MON	48,449	581,393	12/18/2007	11/11/2041
07387M-AE-9	BEAR STEARNS COMMERCIAL MORTGA SERIES 2006PW11 CLASS A4	2			1FE	8,755,801	.97	7430	10,263,015	10,500,000	8,987,808		194,745		5.455	8.788	MON	47,736	577,890	01/13/2009	03/11/2039
07388P-AE-1	BEAR STEARNS COMMERCIAL MORTGA SERIES 2006PW14 CLASS A4	2			1FE	30,202,500	.96	0890	30,748,608	32,000,000	30,513,147		174,779		5.201	6.113	MON	138,693	1,664,320	02/29/2008	12/11/2038
07388Q-AE-9	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007PW17 CLASS A4	2			1FE	22,018,947	.87	5580	20,269,608	23,150,000	22,164,448		104,091		5.694	6.504	MON	109,847	1,318,161	07/25/2008	06/11/2050
07388R-AE-7	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007PW15 CLASS A4	2			1FE	45,998,047	.86	2970	43,148,700	50,000,000	46,645,111		367,292		5.331	6.609	MON	222,125	2,665,500	03/05/2008	02/11/2044
07388V-AE-8	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007T26 CLASS A4	2			1FE	22,356,314	.94	6420	25,515,456	26,960,000	22,773,363		387,267		5.471	8.498	MON	122,915	1,406,936	01/27/2009	01/12/2045
073945-AE-7	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007T28 CLASS A4	2			1FE	24,524,508	.96	3100	30,337,524	31,500,000	25,053,436		482,168		5.742	9.628	MON	150,728	1,665,180	03/02/2009	09/11/2042
07401D-AB-7	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007-PW18 CLASS A2	2			1FE	10,054,906	.101	4260	10,142,580	10,000,000	10,028,306		(13,582)		5.613	5.511	MON	46,775	561,300	12/13/2007	02/11/2013
12513E-AF-1	Citigroup / Deutsche Bank 2005-CD1 ASB	2			1FE	8,328,602	.102	3310	8,493,506	8,304,000	8,304,270		(6,499)		5.224	5.188	MON	36,135	439,646	10/27/2005	01/15/2015
12513Y-AE-0	CITIGROUP/DEUTSCHE BANK COMMER SERIES 2007CD4 CLASS ASB	2			1FE	23,681,641	.95	8690	23,967,250	25,000,000	23,966,597		201,519		5.278	6.451	MON	109,958	1,319,500	07/22/2008	12/11/2049
126175-AB-4	Commercial Mtg Pass-Through Series 2003-LB1A class A2	2			1FE	40,471,982	.97	9850	41,202,861	42,050,000	41,335,618		193,344		4.084	4.674	MON	143,110	1,717,322	03/01/2005	06/10/2038
161505-HZ-8	CHASE COMM MTG SEC CORP SERIES 2001245 144A	2			1FE	7,079,023	.103	2760	7,229,292	7,000,000	7,029,705		(36,684)		6.421	5.916	MON	37,456	455,712	08/19/2008	02/12/2011
161582-AE-1	CHASE MANHATTAN BK-1ST UNION SER 1999-1 C (CMBS-AFC)	2			1FE	16,742,880	.100	4800	16,679,614	16,600,000	16,615,332		(333,756)	(140,952)	7.625	6.117	MON	105,479	1,265,750	10/07/2002	06/15/2010
173110-BE-9	CITIGROUP COMMERCIAL MORTGAGE SERIES 2007C6 CLASS A1	2			1FE	20,723,202	.102	5960	21,340,795	20,800,806	20,759,425		12,013		5.622	5.741	MON	97,452	964,476	05/05/2009	04/10/2012
17313K-AE-1	CITIGROUP COMMERCIAL MORTGAGE SERIES 2008C7 CLASS ASB	2			1FE	37,762,248	.95	3770	36,243,260	38,000,000	37,800,005		22,893		6.092	6.257	MON	192,908	2,348,344	04/11/2008	12/10/2049
20046F-AU-4	COMM SER 2001-J2A B (C.SUB 144A)	2			1FE	4,003,688	.105	5390	4,300,714	4,075,000	4,050,922		7,547		6.304	6.606	MON	21,407	256,888	04/12/2002	07/16/2034
201736-AA-3	COMM'L MTG LEASE-BACKED CERTS 2001-CMLB A1 (MBIA-144A)	2			1FE	7,916,132	.107	6050	8,358,135	7,767,458	7,819,601		(12,564)		6.746	6.466	MON	43,666	523,993	08/24/2001	11/20/2015
201736-AC-9	COMM'L MTG LEASE-BACKED CERTS 2001-CMLB A3 (CTL_144A) MBIA	2			1FE	13,576,641	.111	9700	15,203,219	13,578,000	13,561,404		(2,241)		7.471	7.550	MON	84,534	1,014,412	01/26/2001	06/20/2031
20173Q-AD-3	GREENWICH CAPITAL COMMERCIAL F SERIES 2007G69 CLASS AAB	2			1FE	21,144,524	.97	3430	20,950,053	21,522,000	21,238,045		45,988		5.441	5.798	MON	97,584	1,171,012	11/20/2007	03/10/2039
20173V-AE-0	GREENWICH CAPITAL COMMERCIAL F SERIES 2007G611 CLASS A4	2			2FE	14,469,531	.88	7660	13,314,960	15,000,000	14,549,011		45,208		5.736	6.305	MON	71,700	860,400	05/22/2008	12/10/2049
20173W-CB-2	COMMERCIAL MORTGAGE LOAN TRUST 2008-LS1 A4BF	2			1FE	17,940,626	.68	9670	13,793,380	20,000,000	18,231,368		167,254		5.550	7.134	MON	92,500	1,110,000	03/05/2008	12/10/2049
22540A-AT-5	INDYMAC MANUFAC HOUSING SERIES 1997C1 CLASS E	2			1FE	2,766,905	.101	2380	2,822,338	2,787,814	2,774,318		6,697		7.500	7.884	MON	17,424	209,086	11/18/2008	06/20/2029
22541S-2R-8	CS FIRST BOSTON MORTGAGE SEC Series 2004-C5 Class A/B	2			1FE	20,998,738	.100	7670	21,105,419	20,944,773	20,936,221		(13,614)		4.587	4.557	MON	80,061	960,737	03/17/2005	11/15/2013
22545L-AD-1	CREDIT SUISSE MORTGAGE CAPITAL SERIES 2006-C5 CLASS A3	2			1FE	23,275,372	.83	4220	20,200,516	24,215,000	23,406,646		68,561		5.311	5.947	MON	107,172	1,230,293	02/06/2008	12/15/2039

E10.30



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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest				Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
225470-AP-8	CS FIRST BOSTON MORTGAGE SECUR SERIES 2005C5 CLASS A4			2	1FE	4,275,000	96.3400	4,816,995	5,000,000	4,359,114		84,114			5.100	8.172	MON	21,250	212,500	01/29/2009	08/15/2038
361849-M6-6	GMAC COMM MTG SEC SERIES 2005C1 CLASS A2			2	1FE	7,016,117	100.0940	7,075,252	7,068,579	7,055,686		22,769			4.471	5.179	MON	26,336	316,036	04/11/2008	05/10/2043
36228C-LS-0	GS MTG SEC CORP II 2001-GL3A A2 144A			2	1FE	10,025,684	104.8750	9,596,053	9,150,000	9,378,829		(151,247)			6.449	4.680	MON	49,174	590,084	05/04/2005	08/05/2011
36228C-UV-3	GS MTG SEC CORP II SER 2005-ROCK CLASS 144A			2	1FE	43,669,492	80.5620	35,447,368	44,000,000	43,671,660		9,961			5.366	5.494	MON	196,753	2,361,040	04/12/2007	05/03/2032
36228C-VU-4	GS MTG SEC CORP II SERIES 2005G4 CLASS A4A			2	1FE	12,800,363	96.8170	15,142,116	15,640,000	13,163,610		362,739			4.751	8.658	MON	61,921	743,056	12/23/2008	07/10/2039
36246L-AA-9	GS MORTGAGE SECURITIES CORPORA SERIES 2007G610 CLASS A1			2	1FE	9,044,387	102.3440	9,463,315	9,246,620	9,111,053		43,901			5.690	6.979	MON	43,844	438,444	05/05/2009	08/10/2045
36828Q-KQ-8	GE Capital Commercial Mtg Corp 2005-C1 A4			2	1FE	18,088,828	93.4460	16,820,208	18,000,000	18,035,098		(5,105)			4.724	4.686	MON	70,860	850,320	02/03/2005	07/10/2014
36828Q-PW-0	GE Capital Commercial Mtg Corp SERIES 2005C3 CLASS A7A			2	1FE	12,178,906	95.5570	14,333,610	15,000,000	12,528,298		320,870			4.974	8.897	MON	62,175	704,650	02/06/2009	07/10/2045
396789-ER-6	Greenwich Cap Fund SERIES 2003C2 CLASS A3			2	1FE	5,654,002	101.4230	5,853,092	5,771,000	5,700,541		35,355			4.533	5.281	MON	21,800	261,599	08/28/2008	01/05/2036
396789-JT-7	Greenwich Cap Fund Series 2005-G63 Class AAB			2	1FE	49,665,625	101.5050	50,752,550	50,000,000	49,847,303		44,757			4.619	4.762	MON	192,458	2,309,500	03/21/2005	08/10/2042
46629Y-AC-3	JP MORGAN CHASE COMMERCIAL MOR SERIES 2007CB18 CLASS A4			2	1FE	32,747,469	87.1170	28,574,245	32,800,000	32,746,957		(183)			5.440	5.501	MON	148,693	1,784,320	12/04/2007	06/12/2047
52108H-SZ-8	LB-UBS COMMERCIAL MTGE TRUST 2003-C5 A3			2	1FE	11,130,995	101.6160	11,602,025	11,417,575	11,327,649		32,042			4.254	4.759	MON	26,984	485,704	03/31/2005	07/15/2027
52108H-AF-0	LB-UBS Commercial Mortgage Tru SERIES 2005C7 CLASS A4			2	1FE	4,900,000	98.2910	6,880,391	7,000,000	5,154,286		238,061			5.197	12.277	MON	20,211	363,790	12/02/2008	11/15/2030
52109P-AD-7	LB-UBS Commercial Mortgage Tru 2007-C6 AAB			2	1FE	32,159,622	96.6520	30,928,544	32,700,000	32,107,287		(23,265)			5.855	5.826	MON	104,089	1,873,600	08/24/2007	08/15/2016
52109R-BM-2	LB-UBS Commercial Mortgage Tru SERIES 2007C7 CLASS A3			2	1FE	15,857,211	87.7710	14,218,902	16,200,000	15,900,731		29,458			5.866	6.244	MON	52,794	950,292	07/08/2008	09/15/2045
59022H-NC-2	MERRILL LYNCH MORTGAGE TRUST SERIES 2005LC1 CLASS A4			2	1FE	9,537,109	97.1430	9,714,280	10,000,000	9,619,436		61,356			5.291	6.225	MON	44,092	529,100	08/15/2008	01/12/2044
616912-AA-9	MORGANBERRY CORP SER 1 A (SEQ-144A)			2	1FE	664,236	96.0610	638,074	664,236	664,236					7.802	7.801	MS	13,100	51,824	09/05/1996	03/31/2019
61745M-NB-2	MORGAN STANLEY CAPITAL I 2004-I08 A4			2	1FE	21,564,335	98.1940	20,772,920	21,155,000	21,297,169		(59,796)			4.900	4.615	MON	86,383	1,036,595	04/26/2005	11/15/2013
61745M-T3-7	MORGAN STANLEY CAPITAL I			2	1FE	43,386,207	97.7820	42,124,658	43,080,000	43,155,366		(50,908)			4.830	4.739	MON	173,397	2,080,764	01/12/2005	08/13/2013
61745M-W3-3	MORGAN STANLEY CAPITAL I 2005-T17 AAB			2	1FE	20,701,912	100.8620	20,776,914	20,599,430	20,614,921		(19,252)			4.630	4.567	MON	79,479	953,754	01/20/2005	06/13/2014
61745M-W4-1	MORGAN STANLEY CAPITAL I 2005-T17 A5			2	1FE	17,047,143	98.1790	16,641,341	16,950,000	16,990,840		(12,494)			4.780	4.732	MON	67,518	810,210	01/27/2005	12/13/2014
61745M-YZ-0	MORGAN STANLEY CAPITAL I 2004-I07 A3			2	1FE	10,396,875	101.3420	10,134,230	10,000,000	10,103,695		(66,420)			5.350	4.656	MON	44,583	535,000	03/07/2005	10/15/2012
61747B-AC-9	MSDW MTGE CAPITAL OWNER TRUST 2000-F1 A2A (FRAN-144A) MBIA			2	1FE	6,596,341	82.1210	5,215,687	6,351,230	6,425,073		(82,173)			7.700	7.223	MON	40,754	489,045	11/27/2001	03/15/2015
61750C-AF-4	MORGAN STANLEY CAPITAL I SERIES 2006HQ9 CLASS A4			2	1FE	5,297,461	97.9590	7,346,888	7,500,000	5,491,697		194,236			5.731	12.241	MON	35,819	358,188	02/02/2009	07/12/2044
61750H-AE-6	MORGAN STANLEY CAPITAL I SERIES 2006HQ10 CLASS A4			2	1FE	2,593,719	93.9410	4,067,650	4,330,000	2,744,391		139,433			5.328	14.335	MON	19,225	226,307	03/11/2009	11/12/2041
61751X-AE-0	MORGAN STANLEY CAPITAL I SERIES 2007T25 CLASS A3			2	1FE	10,123,313	95.2210	10,283,836	10,800,000	10,216,508		66,292			5.514	6.578	MON	49,626	595,512	07/23/2008	11/12/2049
61754J-AA-6	Morgan Stanley Capital I 2007-T27 A1			2	1FE	15,952,756	103.1950	16,421,513	15,913,043	15,919,292		(13,583)			5.606	5.488	MON	74,340	948,461	07/19/2007	03/11/2012
61755B-AA-2	MORGAN STANLEY CAPITAL I SERIES 2007-H012 CLASS A1			2	1FE	8,709,326	103.4130	9,240,872	8,935,864	8,802,466		48,998			5.519	6.797	MON	41,098	493,170	02/14/2008	04/12/2049
61756U-AD-3	MORGAN STANLEY CAPITAL I SERIES 2007I016 CLASS A3			2	1FE	25,136,365	96.7970	24,199,150	25,000,000	25,089,694		(23,040)			5.852	5.795	MON	121,917	1,463,000	11/15/2007	12/12/2016
92976B-LJ-9	WACHOVIA BANK COMMERCIAL MORT 2007-IHL8 Class A1			2	1FE	7,014,887	83.6050	6,264,113	7,492,536	7,397,228		59,096			0.313	5.823	MON	1,108	37,224	12/15/2008	06/15/2020
92978M-AE-6	WACHOVIA BANK COMMERCIAL MORT 2006-C28 A4			2	1FE	38,731,250	92.5630	37,025,280	40,000,000	38,985,535		109,986			5.572	6.070	MON	185,733	2,228,800	07/30/2007	10/15/2048
36999999	Industrial and Miscellaneous (Unaffiliated) - Defined Multi-Class Commercial Mortgage-Backed Securities					1,003,812,600	XXX	994,921,218	1,047,818,311	1,008,701,565		3,654,057	(140,952)		XXX	XXX	XXX	4,561,795	54,684,636	XXX	XXX
045424-AE-8	ASC NOMURA-MEGADEAL SER 1995-D1 A4 (C SUB 144A)			2	1FE	3,417,744	105.9730	3,524,937	3,326,272	3,337,796		(9,760)			7.590	7.355	MON	21,039	252,464	04/13/1998	10/11/2012
045424-FK-9	ASC NOMURA-MEGADEAL SER 1997-D5 A2 (COMM)			2	1FE	653,906	107.0000	695,502	650,000	650,733		(374)			6.879	6.903	MON	2,484	45,420	04/28/1999	02/14/2043
05947N-KE-3	BALL 2006-277 PAJ 2006-277 - 144A			2		9,918,134	68.1650	7,498,150	11,000,000	10,103,272		100,055			6.293	8.038	MON	57,686	701,844	12/18/2007	10/10/2045
05947U-L9-7	Banc of America Commercial Mtg 2005-2 AAB			2	1FE	729,787	101.2860	765,704	755,981	738,630		3,116			4.742	5.731	MON	2,987	35,915	07/18/2007	07/10/2043
12613Y-AB-5	CNL FUNDING 2000-AA A2 (MBIA-FRAN 144A)			2	4FE	12,775,432	66.2340	8,434,624	12,734,506	12,748,820		(50,229)	148,949		8.044	5.064	MON	85,364	1,024,364	01/08/2002	02/25/2017
161571-BT-0	Chase Issuance Trust Series 2007-A3			2	1FE	9,810,937	106.2720	10,627,230	10,000,000	9,839,384		20,490			5.230	5.567	MON	23,244	523,000	05/15/2008	04/15/2019
161571-CW-2	Chase Issuance Trust Series 2008-A9			2	1FE	11,998,447	103.9640	12,475,620	12,000,000	11,999,228		630			4.260	4.303	MON	22,720	511,200	05/22/2008	05/15/2013
161623-AL-7	CHASE RV OWNER TRUST 1997-A B (ABS-RV)			2	1FE	343,008	99.7260	340,154	341,089	341,368		(90)			6.540	6.549	MON	991	22,307	01/07/1999	03/15/2012
17305E-DY-8	Citibank Credit Card Issuance Citibank Credit Card Issuance			2	1FE	24,132,859	108.3180	27,702,329	25,575,000	24,300,710		123,507			5.650	6.479	MS	405,399	1,444,988	08/08/2008	09/20/2019

E10.31

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates	
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor-tization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity
201730-AE-1	GREENWICH CAPITAL COMMERCIAL F SERIES 2007G69			2	1FE	13,312,609	.88.3550	12,016,212	13,600,000	13,354,013		26,112			5.444	5.807	MON	61,699	740,384	05/30/2008	03/10/2039
233046-AB-7	DB MASTER FINANCE LLC 2006-1 M1 144A			2	3FE	1,958,140	.84.4960	1,630,773	1,930,000	1,941,253		(6,961)			8.285	7.993	MON	4,886	168,662	09/17/2007	06/20/2011
23321P-C4-8	DLJ MTG SERIES 1996-CF2 CLASS S 144A			2	1FE	9,585	0.0050	.42		9,127		(166)			1.683	200.695	MON	1,291	15,104	02/27/2001	08/12/2016
306035-AC-0	FALCON FRANCHISE LOAN LLC SER 1999-1 B (FRAN-144A)			2	1FE	1,174,588	.99.5120	1,040,715	1,045,822	1,050,448		(26,103)			8.289	5.918	MON	7,224	86,688	12/17/2003	06/05/2010
36246M-AH-2	GLOBAL TOWER PARTNERS ACQ 2007-1A G Series 144A			2	4FE	1,335,000	.98.0000	1,308,300	1,335,000	1,335,000					7.874	8.003	MON	4,672	105,114	05/18/2007	05/15/2037
393505-QY-1	GREEN TREE FINANCIAL CORP SER 1996-9 A6 (CMO-MH)			2	1FE	860,762	.100.7780	786,364	780,294	839,627		(3,472)			7.690	6.250	MON	2,667	60,005	02/25/2004	03/15/2022
393505-RG-9	GREEN TREE FINANCIAL CORP SER 1996-10 A5 (CMO-MH)			2	1FE	62,002	.102.1070	59,681	58,450	58,559		(18)			6.830	4.526	MON	177	3,992	03/12/2004	02/15/2010
395386-AP-0	GREENPOINT MANUFACTURED HSGN 1999-3 1A7 (CMO-MH)			2	4FE	15,146,710	.72.4680	11,870,275	16,380,000	15,114,854		57,319	370,956		7.270	6.747	MON	99,236	1,190,826	02/26/2002	06/15/2029
61756U-AE-1	MORGAN STANLEY CAPITAL I SERIES 20071Q16 CLASS A4			2	1FE	9,516,375	.85.2050	8,179,661	9,600,000	9,524,836		5,940			5.809	5.982	MON	46,472	557,664	07/16/2008	12/12/2049
65475F-AF-2	NISSAN AUTO RECEIVABLES OWNER SERIES 2008A CLASS A4			2	1FE	12,071,267	.104.0560	12,486,732	12,000,000	12,050,728		(20,539)			4.280	4.032	MON	22,827	342,400	05/05/2009	06/15/2012
69361Y-AG-8	PSE&G TRANSITION FUNDING LLC SER 2001-1 A7 (ABS-UTIL)			2	1FE	11,843,797	.114.1510	11,723,256	10,270,000	10,954,913		(142,751)			6.750	5.015	MUSD	30,810	693,225	10/04/2002	09/15/2014
80585B-AU-4	SBA CMBS TRUST SERIES 144A			2	4FE	1,069,977	.102.8750	1,100,763	1,070,000	1,069,989		7			7.825	7.954	MON	3,721	83,676	10/31/2006	11/15/2036
88576P-AB-9	HENDERSON RECEIVABLES I LLC SER 2003-A (ABS-144A)			2	1FE	3,861,827	.88.2280	3,407,398	3,862,024	3,861,922		33			4.855	4.905	MON	8,333	187,502	11/14/2003	11/15/2033
3799999. Industrial and Miscellaneous (Unaffiliated) - Other Multi-Class Commercial Mortgage-Backed/Asset-Backed Securities						146,002,893	XXX	137,674,422	148,314,438	145,225,210		76,746	519,905		XXX	XXX	XXX	915,929	8,796,744	XXX	XXX
3899999. Total - Industrial and Miscellaneous (Unaffiliated) Bonds						11,404,791,266	XXX	11,619,932,874	11,327,921,699	11,291,549,374	(13,188,332)	(12,935,658)	54,816,276	665	XXX	XXX	XXX	166,190,094	650,623,015	XXX	XXX
4199999. Total - Credit Tenant Loans							XXX								XXX	XXX	XXX			XXX	XXX
01039X-AA-8	ALABAMA POWER CAP TR V CO GTY (FIX to FLT) BOND			2	2FE	18,189,520	.100.0000	18,000,000	18,000,000	17,993,958		(28,233)			3.390	5.314	AO	152,536	990,000	10/03/2002	10/01/2042
026351-BB-1	AMERICAN GENERAL CORP UNSEC'D NTS (TRUPS)			2	4FE	2,791,997	.73.6800	1,639,387	2,225,000	2,723,972		1,800,770	(11,399)		8.500	6.504	JJ	94,563	189,125	09/19/2002	07/01/2030
02637X-AA-2	AMERICAN GENL INSTIT CAP NTS 144A SER B			2	4FE	22,563,703	.73.5040	14,884,540	20,250,000	22,489,796		13,681,790	(12,363)		8.125	7.256	MS	484,453	1,604,648	12/21/2007	03/15/2046
05379H-AA-2	AVISTA CAPITAL CAP SECS BNDS			1	3FE	19,824,880	.84.4550	16,890,960	20,000,000	19,867,180		2,685,739	14,461		1.131	6.196	MUSD	19,472	402,649	01/14/1999	06/01/2037
05518F-20-9	BAC CAPITAL TRUST VI			1	3FE	9,354,350	.80.0450	8,004,470	10,000,000	9,381,241		10,177			5.625	6.109	MS	176,563	562,500	04/26/2007	03/08/2035
05529M-AA-0	BB&T CAPITAL TRUST I BASIC			1	1FE	28,862,000	.81.1250	24,337,410	30,000,000	28,919,611		16,100			5.850	6.127	FA	648,375	1,755,000	05/17/2006	08/18/2035
056335-AA-0	Bac Capital Trust XI			1	3FE	37,505,250	.89.3570	31,274,950	35,000,000	37,408,889		(36,413)			6.625	6.097	MN	244,757	2,318,750	05/31/2007	05/23/2036
17305H-AA-6	CITIGROUP CAPITAL III			1	3FE	15,909,885	.74.7590	11,961,472	16,000,000	15,919,113		891			7.625	7.670	JD	101,667	1,220,000	10/14/1998	12/01/2036
20036C-AA-7	Commercial Capital Trust II			1	2FE	15,276,850	.80.0000	12,000,000	15,000,000	15,262,618		(5,269)			6.576	6.427	FA	358,940	986,400	02/15/2007	02/20/2032
22237A-AB-2	COUNTRYWIDE FNDG CORP SUB CAP SECS			1	3FE	20,519,847	.93.7500	18,750,000	20,000,000	20,494,905		(13,549)			8.050	7.821	JD	71,556	1,610,000	01/05/1998	06/15/2027
26156F-AA-1	DRESNER FNDG TRUST I BONDS 144A			1	5FE	12,787,147	.72.1740	8,429,958	11,680,000	12,649,803		(21,915)			8.151	7.343	JD	2,645	952,154	01/07/2002	06/30/2029
302570-AW-6	FPL GROUP CAPITAL			1	1FE	2,820,783	.92.5000	2,682,500	2,900,000	2,819,462		(283)			6.350	6.508	AO	46,038	168,275	12/18/2007	10/01/2016
31945H-AA-3	FIRST CHICAGO-NBD CAP I CAP SEC			1	1FE	19,260,000	.71.1500	14,230,000	20,000,000	19,538,640		93,474			0.831	6.585	FMAN	27,688	407,600	01/22/1998	02/01/2027
33716P-AA-8	FIRST TENNESSEE CAP II CO GTY SER B			1	2FE	5,000,000	.54.3410	2,717,035	5,000,000	5,000,000		2,122,120			6.300	6.300	AO	66,500	315,000	03/24/2004	04/15/2034
33735Y-AA-6	FIRST UNION CAPITAL II CO QUARTY NTS SER A			1	1FE	1,214,170	.97.1630	971,629	1,000,000	1,189,743		(4,716)			7.950	6.267	MN	10,158	79,500	12/15/2003	11/15/2029
38143V-AA-7	GOLDMAN SACHS CAPITAL I SUB (CDTPS)			1	1FE	11,047,600	.93.6260	10,298,849	11,000,000	11,043,818		(764)			6.345	6.313	FA	263,670	697,950	02/25/2004	02/15/2034
40427P-AA-3	HSBC AMERICAS INC CAP SEC 144A			1	1FE	10,000,000	.98.0000	9,800,000	10,000,000	10,000,000					7.808	7.808	JD	34,702	780,800	12/03/1996	12/15/2026
40427Q-AA-1	HSBC AMERICAS INC CAP SEC II 144A			1	1FE	4,394,718	.95.5040	4,049,361	4,240,000	4,326,779		(8,365)			8.380	8.007	MN	45,401	355,312	10/29/1997	05/15/2017
481227-AA-4	JPMC CAPITAL XVIII			1	1FE	1,448,105	.97.1530	1,311,570	1,350,000	1,444,883		(1,332)			6.950	6.397	FA	34,924	93,825	04/20/2007	08/17/2036
48123C-AA-2	JP Morgan Chase Capt			1	1FE	11,318,020	.91.6500	9,944,003	10,850,000	11,316,699		(868)			6.550	6.272	MS	181,617	710,675	02/09/2007	09/15/2066
49326Q-AA-4	KEYCORP CAPITAL III CAPITAL SECURITIES			1	2FE	6,566,435	.83.8820	5,464,938	6,515,000	6,561,282		(1,266)			7.750	7.675	JJ	232,821	504,913	12/08/2003	07/15/2029
53079E-AQ-7	Liberty Mutual 144A			1	3FE	2,601,963	.77.0080	2,133,111	2,770,000	2,605,587		1,676			7.000	7.510	MS	57,093	193,900	12/10/2007	03/15/2037
553086-AC-3	MMI CAP TRUST TRUPS			1	1FE	4,427,350	.78.9750	3,948,740	5,000,000	4,503,609		11,179			7.625	8.730	JD	16,944	381,250	07/14/2000	12/15/2027
638611-AA-1	NATIONWIDE FINL SERV CAP NOTES			1	2FE	15,150,075	.63.2490	9,487,290	15,000,000	15,138,724		(1,479)			7.899	7.816	MS	394,950	1,184,850	06/25/1997	03/01/2037
68331V-AA-4	PECO ENERGY CAP TRST III			1	2FE	7,982,010	.81.4630	7,535,291	9,250,000	8,143,199		24,214			7.380	8.700	AO	115,671	682,650	10/20/2000	04/06/2028
760715-AB-8	REPUBLIC NY CAPITAL I			1	1FE	4,979,293	.91.7360	4,586,810	5,000,000	4,983,528		461			7.750	7.785	MN	49,514	387,500	06/05/1997	11/15/2026
29379V-AN-3	Enterprise Products			1	3FE	3,829,017	.88.5000	3,393,975	3,835,000	3,829,017					7.000	4.260	JD	22,371	134,225	10/27/2009	06/01/2067
293791-AV-1	ENTERPRISE PRODUCTS OPER			1	3FE	6,500,000	.97.5000	6,337,500	6,500,000	6,500,000					8.375	8.375	FA	226,823	544,375	07/13/2006	08/01/2066
844030-AH-9	SOUTHERN UNION CO			1	3FE	5,898,230	.85.5000	5,044,500	5,900,000	5,895,027		(1,306)			7.200	7.183	MN	70,800	424,800	02/22/2007	11/01/2011
868001-AA-4	Suntrust Capital VIII			1	2FE	43,806,850	.69.6520	31,343,220	45,000,000	43,817,973		2,159			6.100	6.270	JD	122,000	2,745,000	04/26/2007	12/01/2066

E10.32

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

**SCHEDULE D - PART 1**

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

1	2	Codes			6	7	Fair Value		10	11	Change in Book/Adjusted Carrying Value				Interest					Dates		
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22	
CUSIP Identification	Description	C o d e	F o r e i g n	B o n d C h a r	NAIC Des.	Actual Cost	Rate Used to Obtain Fair Value	Fair Value	Par Value	Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization) Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Rate of	Effective Rate of	When Paid	Admitted Amount Due and Accrued	Amount Received During Year	Acquired	Maturity	
90330S-AA-8	USF&G CAPITAL NTS 144A				1FE	11,358,600	.912760	9,127,620	10,000,000	11,320,448		(7,242)			8.312	7.275	JJ	415,600	831,200	05/01/2003	07/01/2046	
90654B-BT-8	UNION ELECTRIC CO SUB NOTES			1	2FE	16,138,165	.950980	15,691,121	16,500,000	16,168,955		3,504			7.690	7.870	JD	56,393	1,268,850	01/22/1997	12/15/2036	
91731K-AA-8	USB Capital IX				1FE	39,380,629	.803750	31,426,625	39,100,000	39,380,001		143			6.189	6.141	AO	510,868	2,419,899	10/26/2007	10/29/2049	
929767-AA-9	WACHOVIA CAPITAL TRUST I 144A CAP SECS.			1	1FE	12,980,655	.945480	12,763,926	13,500,000	13,060,632		11,824			7.640	7.993	JJ	475,590	1,031,400	02/07/2001	01/15/2027	
92977E-AA-3	WACHOVIA BANK CAP SECS 144A			1	1FE	5,141,150	.948160	4,740,815	5,000,000	5,078,596		(7,623)			7.965	7.683	JD	33,188	398,250	09/19/1997	06/01/2017	
92978A-AA-0	WACHOVIA CAP TRUST III			1	1FE	21,460,756	.765000	16,547,715	21,631,000	21,467,017		1,699			5.800	5.853	MS	369,409	1,254,598	06/29/2007	03/15/2042	
94978S-AA-7	WELLS FARGO CAPITAL X BASIC				1FE	64,229,300	.870000	56,550,000	65,000,000	64,263,063		10,506			5.950	6.035	JD	171,889	3,867,500	04/11/2007	12/15/2036	
984119-AC-1	XEROX CORPORATION CAP SECS			1	2FE	4,750,000	.990000	9,900,000	10,000,000	4,980,785		48,660			8.000	17.017	FA	333,333	800,000	08/06/1999	02/01/2027	
<b>4299999. Hybrid Securities - Issuer Obligations</b>						547,269,303	XXX	458,201,291	549,996,000	547,488,553	20,290,419	86,743			XXX	XXX	XXX	6,741,482	35,255,363	XXX	XXX	
<b>4899999. Total - Hybrid Securities</b>						547,269,303	XXX	458,201,291	549,996,000	547,488,553	20,290,419	86,743			XXX	XXX	XXX	6,741,482	35,255,363	XXX	XXX	
<b>5599999. Total - Parent, Subsidiaries and Affiliates Bonds</b>							XXX								XXX	XXX	XXX			XXX	XXX	
<b>7799999. Total - Issuer Obligations</b>						10,715,914,122	XXX	11,086,255,846	10,845,777,184	10,751,671,032	7,102,087	319,961	41,806,192	665		XXX	XXX	XXX	171,231,388	614,037,473	XXX	XXX
<b>7899999. Total - Single Class Mortgage-Backed/Asset-Backed Securities</b>						657,518,339	XXX	663,358,387	634,344,627	655,174,193		(370,699)			XXX	XXX	XXX	2,944,249	19,231,563	XXX	XXX	
<b>7999999. Total - Defined Multi-Class Residential Mortgage-Backed Securities</b>						1,405,318,640	XXX	1,460,978,015	1,449,703,098	1,413,222,204		3,357,092	64,246		XXX	XXX	XXX	6,529,853	75,473,856	XXX	XXX	
<b>8099999. Total - Other Multi-Class Residential Mortgage-Backed Securities</b>						253,156,886	XXX	201,864,409	276,142,538	253,200,652		365,980	12,566,885		XXX	XXX	XXX	1,338,712	15,453,204	XXX	XXX	
<b>8199999. Total - Defined Multi-Class Commercial Mortgage-Backed Securities</b>						1,256,874,023	XXX	1,260,693,809	1,297,506,729	1,261,617,731		3,590,153	(140,952)		XXX	XXX	XXX	5,863,553	69,366,238	XXX	XXX	
<b>8299999. Total - Other Multi-Class Commercial Mortgage-Backed/Asset-Backed Securities</b>						146,002,893	XXX	137,674,422	148,314,438	145,225,210		76,746	519,905		XXX	XXX	XXX	915,929	8,796,744	XXX	XXX	
<b>8399999 - Total Bonds</b>						14,434,784,903	XXX	14,810,824,888	14,651,788,614	14,480,111,022	7,102,087	7,339,233	54,816,276	665	XXX	XXX	XXX	188,823,684	802,359,078	XXX	XXX	

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

**SCHEDULE D - PART 2 - SECTION 1**

Showing All PREFERRED STOCKS Owned December 31 of Current Year

1 CUSIP Identi- fication	2 Description	Codes		5 Number of Shares	6 Par Value Per Share	7 Rate Per Share	8 Book/ Adjusted Carrying Value	Fair Value		11 Actual Cost	Dividends			Change in Book/Adjusted Carrying Value				20 NAIC Desig- nation	21 Date Acquired	
		3 Code	4 For- eign					9 Rate Per Share Used to Obtain Fair Value	10 Fair Value		12 Declared but Unpaid	13 Amount Received During Year	14 Nonadmitted Declared But Unpaid	15 Unrealized Valuation Increase/ (Decrease)	16 Current Year's (Amor- tization) Accretion	17 Current Year's Other Than Temporary Impairment Recognized	18 Total Change in Book/Adjusted Carrying Value (15 + 16 - 17)			19 Total Foreign Exchange Change in Book/ Adjusted Carrying Value
283678-20-9	EL PASO ENERGY CAP TRST FIRSTAR CORP 8.875% REIT PFD SER B (144A)			14,900,000	50.00	30.411	447,324	36.563	544,781	453,119		34,378		50,840			50,840	P4LFE	09/14/2009	
33765A-20-2				17,000,000	1,000.00		16,843,715	869.063	14,774,063	16,843,715		1,508,750						P2UFE	08/01/2004	
74251V-20-1	Principal Finl Group REGIONS FINANCIAL ASSET MGMT 8.44% PFD			250,000,000	100.00		25,000,000	76.031	19,007,825	25,000,000		1,390,750						P2LFE	06/14/2005	
75913Y-30-1	4/30/10 (144A)			4,500,000	1,000.00		4,487,851	983.710	4,426,695	4,337,564		379,800		33,916			33,916	RP3LFE	08/01/2004	
86788X-20-3	SUNTRUST BANK REIT 9% SER B PFD (144A) CENTAUR FUNDING CORP PFD SER B 9.08%			50,000	100,000.00		4,901,200	35,000.000	1,750,000	4,901,200		450,000						P2LFE	09/01/2000	
151327-20-2	4/21/20 144A		F	9,562,000	1,000.00		11,498,855	1,016.250	9,717,383	12,261,887		868,230		(129,124)			(129,124)	RP2LFE	08/01/2004	
8499999	Total - Preferred Stock - Industrial and Miscellaneous (Unaffiliated)							63,178,945	XXX	50,220,747	63,797,485		4,631,908		50,840	(95,208)		(44,368)	XXX	XXX
8999999	Total Preferred Stocks							63,178,945	XXX	50,220,747	63,797,485		4,631,908		50,840	(95,208)		(44,368)	XXX	XXX

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

**SCHEDULE D - PART 2 - SECTION 2**

Showing All COMMON STOCKS Owned December 31 of Current Year

1	2	Codes		5	6	Fair Value		9	Dividends			Change in Book/Adjusted Carrying Value				17	18
		3	4			7	8		10	11	12	13	14	15	16		
CUSIP Identification	Description	Code	Foreign	Number of Shares	Book/Adjusted Carrying Value	Rate Per Share Used to Obtain Fair Value	Fair Value	Actual Cost	Declared but Unpaid	Amount Received During Year	Nonadmitted Declared But Unpaid	Unrealized Valuation Increase/(Decrease)	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (13 - 14)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	NAIC Market Indicator (a)	Date Acquired
00685R-40-9	ADELPHIA CONTINGENT VALUE			2,564,197.000	82,054	0.032	82,054	32,052				247,189	190,777	56,412		L	02/13/2007
006ESC-9F-6	ADELPHIA CONTINGENT VALUE			2,625,000.000		0.000										U	02/13/2007
017361-10-6	ALLEGHENY ENERGY INC			154,500.000	3,627,660	23.480	3,627,660	3,942,269		18,735		(314,609)		(314,609)		L	12/31/2009
053015-10-3	AUTOMATIC DATA PROCESSING			121,700.000	5,211,194	42.820	5,211,194	4,615,518	41,378	103,620		649,615		649,615		L	09/21/2009
093671-10-5	H & R BLOCK			163,100.000	3,689,322	22.620	3,689,322	3,396,574	24,465	87,900		333,793	311,168	22,625		L	12/07/2009
125581-80-1	CIT GROUP INC			170,477.000	4,706,870	27.610	4,706,870	4,746,656				(39,786)		(39,786)		U	12/10/2009
131347-30-4	CALPINE CORP COMMON			395,368.000	4,349,048	11.000	4,349,048	3,998,582				4,622,808	3,173,623	1,449,185		L	09/29/2009
134429-10-9	CAMPBELL SOUP CO			41,700.000	1,409,460	33.800	1,409,460	1,262,893	11,468	11,400		146,567		146,567		L	11/03/2009
16122M-10-0	CHARTER FINANCIAL CORP			52,900.000	529,000	10.000	529,000	1,342,223				50,825		37,832		U	10/28/2009
171798-10-1	CIMAREX ENERGY CO COMMON			77,600.000	4,110,472	52.970	4,110,472	2,450,323		17,778		2,589,690	466,950	2,122,740		L	03/16/2009
191216-10-0	COCA COLA CO			15,400.000	877,800	57.000	877,800	633,493		25,256		180,642		180,642		L	04/13/2006
191219-10-4	COCA-COLA ENTERPRISES COMMON			90,400.000	1,916,480	21.200	1,916,480	1,545,296				828,968		828,968		L	09/29/2008
20030N-20-0	COMCAST CORP			103,000.000	1,649,030	16.010	1,649,030	1,485,264		2,916		163,766		163,766		L	11/04/2009
254687-10-6	THE WALT DISNEY CO.			17,923.000	578,017	32.250	578,017	561,425	6,273	6,273		171,344		171,344		L	09/03/2008
257701-20-1	DONEGAL GROUP INC-CL A COMMON			23,800.000	369,852	15.540	369,852	394,995				16,726		(16,726)		L	08/07/2009
263534-10-9	DUPONT (E) DE NEMOURS			221,000.000	7,441,070	33.670	7,441,070	7,940,540		356,618		3,342,097	1,521,702	1,820,395		L	12/22/2009
28336L-10-9	EL PASO CORPORATION			77,700.000	763,791	9.830	763,791	831,621	777	10,360		304,559	188,448	116,111		L	09/11/2009
283677-85-4	EL PASO ELECTRIC CO			13,351.000	270,758	20.280	270,758	249,643				29,239		29,239		L	04/18/2006
346233-10-9	FORESTAR REAL ESTATE GROUP COMMON			73,400.000	1,613,332	21.980	1,613,332	330,880				914,564		914,564		L	12/19/2008
349631-10-1	FORTUNE BRANDS, INC.			46,800.000	2,021,760	43.200	2,021,760	2,090,462		40,821		379,389	162,498	216,891		L	12/16/2009
363576-10-9	GALLAGHER (ARTHUR J.) & CO			28,900.000	650,539	22.510	650,539	754,982	9,248	36,992		(98,260)		(98,260)		L	11/03/2008
373200-30-2	GEORGIA GULF CORP			31,537.000	548,113	17.380	548,113	154,377				393,736		393,736		L	10/29/2009
388689-10-1	GRAPHIC PACKAGING HOLDING CO COMMON			187,200.000	649,584	3.470	649,584	445,651				436,176		436,176		L	12/29/2008
42809H-10-7	HESS CORP			30,743.000	1,859,952	60.500	1,859,952	1,013,572	3,074	12,297		505,529	294,632	210,897		L	11/13/2008
447011-10-9	HUNTSMAN CORP COMMON			8,300.000	93,707	11.290	93,707	22,530				71,177		71,177		L	03/10/2009
459506-10-1	INTL FLAVORS & FRAGRANCES			24,400.000	1,003,816	41.140	1,003,816	799,010	6,100	10,550		204,806		204,806		L	07/01/2009
46146P-10-2	INVESTORS BANCORP INC			19,000.000	207,860	10.940	207,860	267,615				(47,310)		(47,310)		L	07/21/2008
521865-20-4	Lear Corp			15,399.000	1,041,588	67.640	1,041,588	226,920				814,668		814,668		L	11/18/2008
540424-10-8	LOEWS CORP			117,300.000	4,263,855	36.350	4,263,855	3,489,005		25,044		1,275,538	203,574	1,071,964		L	10/14/2009
565849-10-6	MARATHON OIL CORP			77,000.000	2,403,940	31.220	2,403,940	2,777,325		62,448		390,934	176,225	214,709		L	07/22/2009
582411-10-4	MCMORAN EXPLORATION CO COMMON			137,600.000	1,103,552	8.020	1,103,552	730,207				373,345		373,345		L	07/08/2009
587902-10-7	MERCER INSURANCE GROUP INC COMMON			21,400.000	388,838	18.170	388,838	306,207		5,520		96,936		96,936		L	05/05/2009
589433-10-1	Meredith Corp			133,400.000	4,115,390	30.850	4,115,390	4,022,015		120,060		1,831,582		1,831,582		L	08/11/2008
60467R-10-0	MIRANT CORP			502,004.000	7,665,601	15.270	7,665,601	7,307,369				5,199,919	6,981,024	(1,781,105)		L	12/07/2009
640079-10-9	NEENAH PAPER INC			106,200.000	1,481,490	13.950	1,481,490	1,014,809		36,330		909,629	143,325	766,304		L	05/06/2009
650111-10-7	THE NEW YORK TIMES COMPANY CL A			82,200.000	1,015,992	12.360	1,015,992	1,372,660				625,106	211,640	413,466		L	08/27/2008
651639-10-6	NEWMONT MINING CORP			107,700.000	5,095,287	47.310	5,095,287	4,728,397		43,080		711,897		711,897		L	11/03/2008
67073Y-10-6	NV Energy			275,600.000	3,411,928	12.380	3,411,928	2,851,189				112,996		686,244		L	11/17/2008
717081-10-3	PFIZER INC			195,200.000	3,550,688	18.190	3,550,688	4,163,519				139,520		80,124		L	12/08/2009
737464-10-7	POST PROPERTIES INC			248,400.000	4,868,640	19.600	4,868,640	6,755,030	49,680	195,440		2,518,337	1,748,253	770,084		L	12/18/2009
74973W-10-7	RTI INTERNATIONAL METALS INC			9,800.000	246,666	25.170	246,666	223,552				23,114		23,114		L	11/09/2009
774186-10-0	ROCKVILLE FINANCIAL INC			17,100.000	179,550	10.500	179,550	234,421			3,420	(59,337)		(59,337)		L	07/21/2008
77581P-10-9	ROMA FINANCIAL INC			10,600.000	131,016	12.360	131,016	150,979				3,392		(2,438)		L	07/21/2008
798241-10-5	SAN JUAN BASIN ROYALTY TR			35,100.000	605,124	17.240	605,124	522,134	3,905	9,864		82,990		82,990		L	09/01/2009
803111-10-3	SARA LEE CORP			83,300.000	1,014,594	12.180	1,014,594	923,826				90,768		90,768		L	11/04/2009
855707-10-5	STATE AUTO FINANCIAL CORP			136,400.000	2,523,400	18.500	2,523,400	3,045,376		71,820		(825,390)	198,018	(1,023,408)		L	12/18/2009
868536-10-3	SUPERVALU INC			80,702.000	1,025,722	12.710	1,025,722	1,456,327		28,639		(111,682)		(111,682)		L	12/29/2009
879433-10-0	TELEPHONE AND DATA SYSTEMS, INC			25,300.000	858,176	33.920	858,176	832,246		1,258		25,930		25,930		L	12/22/2009
884453-10-1	THOMAS PROPERTIES GROUP			40,800.000	120,768	2.960	120,768	104,910		3,534		193,412	179,988	13,424		L	01/09/2009
890516-10-7	Tootsie Roll			137,868.000	3,774,826	27.380	3,774,826	3,470,525	11,029	36,420		379,861		379,861		L	10/14/2009
909205-10-6	Unisource Energy Corp			71,500.000	2,301,585	32.190	2,301,585	1,723,881		82,940		202,345		202,345		L	04/09/2008
931422-10-9	WALGREEN CO			36,800.000	1,351,296	36.720	1,351,296	900,297		18,400		442,404		442,404		L	01/15/2009
941888-10-9	WATERSTONE FINANCIAL INC WATERSTONE FINANCIAL INC			50,500.000	103,525	2.050	103,525	463,319				129,903	195,553	(65,650)		L	12/17/2008

E12

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

**SCHEDULE D - PART 2 - SECTION 2**

Showing All COMMON STOCKS Owned December 31 of Current Year

1	2	Codes		5	6	Fair Value		9	Dividends			Change in Book/Adjusted Carrying Value				17	18	
		3	4			7	8		10	11	12	13	14	15	16			
CUSIP Identification	Description	Code	Foreign	Number of Shares	Book/Adjusted Carrying Value	Rate Per Share Used to Obtain Fair Value	Fair Value	Actual Cost	Declared but Unpaid	Amount Received During Year	Nonadmitted Declared But Unpaid	Unrealized Valuation Increase/(Decrease)	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (13 - 14)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	NAIC Market Indicator (a)	Date Acquired	
969490-10-1	CLAYTON WILLIAM COMMON			60,400,000	2,115,812	35.030	2,115,812	1,321,168				777,815	49,000	728,815		L	11/10/2009	
984121-10-3	XEROX CORP			324,241,000	2,743,079	8.460	2,743,079	2,991,271	13,780	47,909		1,094,304	801,819	292,485		L	11/06/2009	
000000-00-0	CALPINE ESCROW			4,495,000,000	258,463	0.058	258,463	279,888				862,305	783,642	78,663		U	07/21/2008	
067901-10-8	Barrick Gold Corp	A		162,300,000	6,391,374	39.380	6,391,374	5,377,186		54,757		1,413,506	991,204	422,302		L	12/28/2009	
257559-20-3	DOMTAR CORP	A		91,602,000	5,075,667	55.410	5,075,667	3,671,584				1,404,083	410,716	993,367		L	12/29/2009	
65334H-10-2	NEXEN INC COMMON	A		314,200,000	7,518,806	23.930	7,518,806	5,774,974		41,904		4,177,887	2,001,922	2,175,965		L	11/25/2009	
666416-10-2	Northgate Minerals Corp	A		228,100,000	702,548	3.080	702,548	385,037				615,537	111,300	504,237		U	12/31/2009	
68383K-10-9	OPTI CANADA INC COMMON	C		430,200,000	833,029	1.936	833,029	1,466,020				203,145	278,040	(74,895)	278,204		U	01/06/2009
887147-13-0	TIMBERWEST FOREST CRP	C		366,900,000	1,518,907	4.140	1,518,907	2,466,549				(1,197,785)	439,666	(1,637,451)	250,142		L	10/28/2009
92849T-10-8	VITERRA INC.	C		40,400,000	380,358	9.415	380,358	312,298				22,810		22,810	46,652		U	11/04/2008
981442-10-6	WORLD COLOR PRESS INC	A		50,642,000	466,413	9.210	466,413	110,000				356,413		356,413		U	09/03/2009	
C01023-20-6	AINSWORTH LUMBER CO LTD	C		484,554,000	1,224,848	2.528	1,224,848	354,934				2,070,032	1,488,880	581,152	274,737		L	08/07/2008
035128-20-6	ANGLOGOLD ASHANTI-SPON ADR	F		15,900,000	638,862	40.180	638,862	355,021		2,012		198,273		198,273		L	10/03/2008	
38059T-10-6	GOLD FIELDS LTD	F		437,600,000	5,736,936	13.110	5,736,936	6,072,386		45,018		928,011		928,011		L	10/21/2009	
76026T-20-5	REPSOL SA SPONSORED ADR	R		85,600,000	2,282,096	26.660	2,282,096	1,965,695		21,244		316,401		316,401		L	12/18/2009	
G0450A-10-5	Arch Capital Group Ltd	F		23,000,000	1,645,650	71.550	1,645,650	1,514,106				131,544		131,544		L	12/18/2009	
66052F-10-3	MAX CAPITAL GROUP LTD MAX CAPITAL GROUP LTD	F		86,600,000	1,931,180	22.300	1,931,180	1,438,877		29,884		381,807		381,807		L	08/10/2009	
G7127P-10-0	PLATINUM UNDERWRITERS HLDGS PLATINUM UNDERWRITER HLDGS	F		39,700,000	1,520,113	38.290	1,520,113	1,245,604		9,832		225,085		225,085		L	12/18/2009	
H89128-10-4	TYCO International	R		40,200,000	1,434,336	35.680	1,434,336	1,267,367		23,947		146,969		146,969		L	06/01/2009	
<b>9099999. Total - Common Stock - Industrial and Miscellaneous (Unaffiliated)</b>					<b>149,292,055</b>	<b>XXX</b>	<b>149,292,055</b>	<b>137,494,856</b>	<b>181,177</b>	<b>2,109,348</b>		<b>46,251,076</b>	<b>23,703,587</b>	<b>22,547,489</b>	<b>849,735</b>	<b>XXX</b>	<b>XXX</b>	
084670-20-7	BERKSHIRE HATHAWAY INC CLASS B			1,444,000	4,744,984	3,286.000	4,744,984	4,405,552				100,309		100,309		L	12/18/2009	
000000-00-0	First Symetra National Life of New York			20,000,000	62,009,786	3,100.489	62,009,786	62,000,000				(662,752)		(662,752)		U	10/11/1989	
000000-00-0	Symetra National Life			20,000,000	10,243,586	512.179	10,243,586	7,000,000				(741,615)		(741,615)		U	04/25/1983	
<b>9199999. Total - Common Stock - Parent, Subsidiaries and Affiliates</b>					<b>76,998,356</b>	<b>XXX</b>	<b>76,998,356</b>	<b>73,405,552</b>				<b>(1,304,058)</b>		<b>(1,304,058)</b>		<b>XXX</b>	<b>XXX</b>	
723682-10-0	Pioneer Fund A			7,582,986	270,864	35.720	270,864	246,546		3,074		49,863		49,863		L	12/31/2009	
724010-10-3	Pioneer Value Fund A			2,251,217	23,638	10.500	23,638	31,848		328		3,822		3,822		L	12/31/2009	
723750-10-8	Pioneer Mid Cap Value Fund A			1,602,524	28,893	18.030	28,893	36,335		199		5,523		5,523		L	12/31/2009	
72387H-40-8	Pioneer Growth opportunities Fund A			12,513,907	285,442	22.810	285,442	213,753				86,808		86,808		L	12/31/2009	
72387P-72-6	Pioneer Government Income Fund A			218,552	2,133	9.760	2,133	2,154		93		(9)		(9)		L	12/31/2009	
<b>9299999. Mutual Funds</b>					<b>610,970</b>	<b>XXX</b>	<b>610,970</b>	<b>530,636</b>		<b>3,694</b>		<b>146,007</b>		<b>146,007</b>		<b>XXX</b>	<b>XXX</b>	
723755-10-4	Pioneer Cash Reserves Fund A			2,746,510	2,747	1.000	2,747	2,747		4						L	12/31/2009	
<b>9399999. Money Market Mutual Funds</b>					<b>2,747</b>	<b>XXX</b>	<b>2,747</b>	<b>2,747</b>		<b>4</b>						<b>XXX</b>	<b>XXX</b>	
<b>9799999 - Total Common Stocks</b>					<b>226,904,128</b>	<b>XXX</b>	<b>226,904,128</b>	<b>211,433,791</b>	<b>181,177</b>	<b>2,113,046</b>		<b>45,093,025</b>	<b>23,703,587</b>	<b>21,389,438</b>	<b>849,735</b>	<b>XXX</b>	<b>XXX</b>	
<b>9899999 - Total Preferred and Common Stocks</b>					<b>290,083,073</b>	<b>XXX</b>	<b>277,124,875</b>	<b>275,231,276</b>	<b>181,177</b>	<b>6,744,954</b>		<b>45,143,865</b>	<b>23,703,587</b>	<b>21,345,070</b>	<b>849,735</b>	<b>XXX</b>	<b>XXX</b>	

(a) For all common stock bearing the NAIC market indicator "U" provide: the number of such issues .....10 , the total \$ value (included in Column 8) of all such issues \$ .....80,130,053

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
36202F-BK-1	Government National Mortgage A POOL 4542 5.500% 09/20/39		09/30/2009	Morgan Stanley & Co., Inc.		3,931,971	3,738,897	11,424
3620A2-T5-5	GNMA 5.000% 05/15/39		06/23/2009	JP Morgan Securities, Inc.		20,331,125	20,033,749	52,867
3620A9-PZ-8	Government National Mortgage A POOL 723240 5.000% 10/15/39		11/03/2009	Bank of America Securities		5,470,357	5,273,427	13,184
3620AA-TX-6	Government National Mortgage A POOL 724266 5.500% 09/15/39		10/06/2009	Bank of America Securities		10,523,954	9,990,108	30,525
3620AC-6M-1	GNM 2009-20 A POOL 726376 5.000% 10/15/39		11/20/2009	JP Morgan Securities, Inc.		5,314,743	5,083,598	14,121
3620AC-DA-9	GNM 2009-20 A POOL 725597 5.470% 07/20/59		06/23/2009	Bank of America Securities		38,595,785	37,354,496	119,327
3620AC-DA-9	GNM 2009-20 A POOL 725597 5.470% 07/20/59		12/01/2009	Interest Capitalization		661,004	661,004	
3620AC-DB-7	GNM 2009-20 A 5.470% 08/20/59		07/16/2009	Bank of America Securities		18,855,439	18,150,000	66,187
3620AC-DB-7	GNM 2009-20 A 5.470% 08/20/59		12/01/2009	Interest Capitalization		248,719	248,719	
36295P-U2-6	Government National Mortgage A POOL 676601 6.500% 11/15/37		05/05/2009	Direct		5,265,678	4,997,979	3,610
36295P-YT-3	Government National Mortgage A POOL 676722 5.500% 02/15/38		09/18/2009	Morgan Stanley & Co., Inc.		5,254,520	5,011,016	15,311
362960-3N-7	Government National Mortgage A POOL 698405 5.000% 07/15/39		08/18/2009	Bank of America Securities		21,505,307	20,996,790	58,324
362960-H9-3	Government National Mortgage A POOL 697856 5.500% 02/15/39		09/18/2009	Morgan Stanley & Co., Inc.		5,534,570	5,278,088	16,127
36296X-HC-1	Government National Mortgage A POOL 704127 5.500% 01/15/39		02/06/2009	JP MORGAN EQUITIES		6,596,586	6,392,815	17,580
36297A-KW-2	Government National Mortgage A POOL 706009 5.500% 01/15/39		05/05/2009	Various		7,185,292	6,934,284	9,548
36297C-YC-7	Government National Mortgage A POOL 708207 5.500% 02/15/39		02/06/2009	Sandler O'Neil		8,435,049	8,224,302	22,617
36297E-YU-3	Government National Mortgage A 5.461% 08/20/59		09/03/2009	Bank of America Securities		64,987,893	61,279,976	139,438
36297E-YU-3	Government National Mortgage A 5.461% 08/20/59		12/01/2009	Interest Capitalization		819,085	819,085	
36297E-YY-1	Government National Mortgage A Pool # 710024 5.460% 08/20/59		09/10/2009	Jefferies & Co., Inc.		90,342,900	84,981,747	296,445
36297E-YY-1	Government National Mortgage A Pool # 710024 5.460% 08/20/59		11/01/2009	Interest Capitalization		581,947	581,947	
880591-EH-1	TENNESSEE VALLEY AUTHORITY 5.250% 09/15/39		09/16/2009	Barclays Capital, Inc.		988,820	1,000,000	1,021
<b>0399999. Bonds - U.S. Governments</b>						321,430,744	307,032,027	887,656
3133T4-V6-0	FHLMC REMIC SER 1709-Z 6.500% 03/15/24		12/01/2009	Interest Capitalization		331,056	331,056	
31359A-KE-8	FNMA REMIC SER 1993-65 ZZ (ACRL) 7.000% 06/25/13		01/01/2009	Direct		96,558	96,558	
31359F-TF-5	FNMA REMIC SER 1993-223 PZ (PAC Z) 6.500% 12/25/23		10/01/2009	Interest Capitalization		134,974	134,974	
31368H-NN-9	Fannie Mae 5.000% 09/01/39		08/27/2009	Citibank Mortgages		21,308,571	20,815,822	37,584
31392E-3V-0	FNMA REMIC SER 2002-71 PZ (PAC-Z) 5.500% 11/25/32		12/01/2009	Interest Capitalization		1,229,963	1,229,963	
31393B-N9-2	FNMA REMIC SER 2003-35 DZ (PAC Z) 5.500% 05/25/33		12/01/2009	Interest Capitalization		76,981	76,981	
31393C-SM-1	FNMA REMIC SER 2003-66 MZ (PAC Z) 5.000% 07/25/23		12/01/2009	Interest Capitalization		102,525	102,525	
31393D-VQ-1	FNMA REMIC SER 2003-61 MZ (PAC Z) 5.000% 08/25/33		12/01/2009	Interest Capitalization		467,666	467,666	
31393E-2C-2	FNMA REMIC SER 2003-85 PZ (PAC Z) 5.000% 09/25/33		12/01/2009	Interest Capitalization		427,266	427,266	
31393E-IJ-5	FNMA REMIC SER 2003-84 PZ (PAC Z) 5.000% 09/25/33		12/01/2009	Interest Capitalization		908,733	908,733	
31393L-AC-6	FHLMC REMIC SER 2571 PZ (PAC Z) 5.500% 02/15/33		12/01/2009	Interest Capitalization		1,553,772	1,553,772	
31393N-QM-4	FHLMC REMIC SER 2599 DZ (PAC-Z) 5.500% 04/15/33		12/01/2009	Interest Capitalization		76,981	76,981	
31393T-S2-3	FNMA REMIC SER 2003-109 PZ (PAC Z) 6.000% 11/25/33		12/01/2009	Interest Capitalization		42,014	42,014	
31393W-6V-6	FHLMC REMIC SER 2640 BZ (PAC-Z) 5.000% 07/15/33		12/01/2009	Interest Capitalization		1,056,928	1,056,928	
31393W-BR-9	FHLMC REMIC SER 2640 PZ (PAC Z) 5.000% 07/15/33		12/01/2009	Interest Capitalization		1,019,252	1,019,252	
31393W-SV-2	FHLMC REMIC SER 2645 NZ (PAC Z) 5.000% 07/15/33		12/01/2009	Interest Capitalization		134,077	134,077	
31393W-WZ-8	FHLMC REMIC SER 2638 CZ (PAC-Z) 5.000% 07/15/33		12/01/2009	Interest Capitalization		216,333	216,333	
31393X-BJ-5	FNMA REMIC SER 2004-12 WZ (PAC-Z) 6.000% 03/25/34		12/01/2009	Interest Capitalization		164,737	164,737	
31393X-V8-7	FNMA REMIC SER 2004-35 AZ (ACRL) 4.500% 05/25/34		12/01/2009	Interest Capitalization		849,790	849,790	
31394H-R4-5	FHLMC REMIC SER 2663 ZP (PAC-Z) 5.000% 08/15/33		12/01/2009	Interest Capitalization		60,084	60,084	
31394K-CT-9	FHLMC REMIC SER 2690 TZ (PAC Z) 4.500% 10/15/33		12/01/2009	Interest Capitalization		579,394	579,394	
31394K-D3-5	FHLMC REMIC SER 2690 VZ (PAC Z) 5.000% 10/15/33		12/01/2009	Interest Capitalization		454,475	454,475	
31394K-NB-3	FHLMC REMIC SER 2686 KZ (ACRL) 4.500% 10/15/33		12/01/2009	Interest Capitalization		72,760	72,760	
31394M-KN-9	FHLMC REMIC SER 2714 LZ (PAC Z) 5.500% 12/15/33		12/01/2009	Interest Capitalization		367,189	367,189	
31394M-NH-9	FHLMC REMIC SER 2716 VZ (PAC Z) 5.000% 12/15/33		12/01/2009	Interest Capitalization		328,624	328,624	
31394R-VE-6	FHLMC REMIC SER 2758 KZ (PAC Z) 5.500% 03/15/34		12/01/2009	Interest Capitalization		512,434	512,434	
31394R-Y7-8	FHLMC REMIC SER 2761 QZ (PAC-Z) 6.000% 03/15/34		12/01/2009	Interest Capitalization		69,665	69,665	
31394W-NL-8	FHLMC REMIC SER 2777 ZC (ACRL-SEQ) 4.500% 04/15/34		12/01/2009	Interest Capitalization		760,477	760,477	
31394W-Y9-3	FHLMC REMIC SER 2785 ZU (PAC Z - RESEC) 5.000% 03/15/34		12/01/2009	Interest Capitalization		1,059,047	1,059,047	
31397A-FM-0	FHR 3199 6.000% 08/15/36		12/01/2009	Interest Capitalization		744,677	744,677	
31398E-L2-8	FREDDIE MAC 3554 3.400% 07/15/19		07/08/2009	First Tennessee Bank		11,740,301	11,718,329	32,095
31398F-XE-6	Fannie Mae 4.500% 11/25/24		11/18/2009	Jefferies & Co., Inc.		1,048,121	1,036,461	2,850
31412Q-BN-8	FANNIE MAE 5.000% 07/01/39		07/13/2009	UBS PainelWebber, Inc.		23,684,205	23,166,577	38,611
31412U-H3-7	FANNIE MAE POOL 935050 5.000% 03/01/39		05/06/2009	Citigroup Global Markets		6,745,053	6,548,595	10,005
31414P-AZ-9	FANNIE MAE POOL 972540 5.500% 02/01/38		02/13/2009	JMP Securities		1,458,792	1,418,886	3,902
31415Y-XT-1	FANNIE MAE POOL 993590 5.000% 05/01/39		05/22/2009	Morgan Stanley & Co., Inc.		9,542,035	9,276,777	12,884
31416H-Q3-2	FANNIE MAE POOL AA0473 5.000% 03/01/39		02/26/2009	Greenwich Capital Mkts., Inc.		20,007,024	19,656,885	30,031
31416M-KD-5	Fannie Mae 5.000% 03/01/39		08/31/2009	Citibank Mortgages		11,723,041	11,419,705	20,619
31416R-GU-1	FANNIE MAE POOL AA7410 5.000% 05/01/39		05/29/2009	JP Morgan Securities, Inc.		9,141,105	8,915,433	12,383
31416R-PC-1	FANNIE MAE POOL AA7618 5.000% 05/01/39		05/06/2009	KBC Securities		11,667,602	11,319,184	17,293
31417S-7M-6	Fannie Mae POOL AC6299 5.000% 12/01/39		12/08/2009	Bank of America Securities		9,811,523	9,375,000	16,927
31418M-J7-8	Fannie Mae POOL AD0285 5.000% 09/01/22		10/22/2009	Credit Suisse First Boston		23,831,766	22,552,610	50,117
37611C-AA-4	GNMA REMIC SERIES 200775 CLASS A 4.747% 04/16/29		06/05/2009	Raymond James & Associates		2,428,980	2,368,292	4,996

E13

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
38373M-5H-9	GNMA REMIC 2009-7 Z 5.905% 12/16/50		01/28/2009	JP Morgan Securities, Inc.		8,600,000	8,600,000	36,674
38373M-5H-9	GNMA REMIC 2009-7 Z 5.905% 12/16/50		12/01/2009	Interest Capitalization		432,653	432,653	
38373M-AK-6	GNMA REMIC SER 2001-16 Z (AFC-PZ) 6.750% 10/16/40		02/01/2009	Interest Capitalization		124,522	124,522	
38373M-AR-1	GNMA REMIC SER 2001-34 Z (PROJ Z-ADJ) 7.021% 03/16/41		12/01/2009	Interest Capitalization		3,071,731	3,071,731	
38373M-AX-8	GNMA REMIC 2001-44 Z (ADJ-ACRL/FHA INSD) 6.877% 07/16/41		12/01/2009	Interest Capitalization		2,917,338	2,917,338	
38373M-BE-9	GNMA REMIC SER 2001-58 Z (PROJ Z-ADJ) 6.221% 09/16/41		12/01/2009	Interest Capitalization		1,061,326	1,061,326	
38373M-FX-3	GNMA REMIC SER 2002-56 Z (ADJ-ACRL) 6.553% 06/16/42		12/01/2009	Interest Capitalization		163,082	163,082	
38373M-G4-6	GNMA REMIC SERIES 200734 CLASS A 4.272% 11/16/26		10/07/2009	Various		1,063,831	1,035,496	655
38373M-PT-1	GNMA REMIC SERIES 200529 CLASS A 4.016% 07/16/27		10/07/2009	Raymond James & Associates		894,035	869,182	1,164
38373M-Q2-9	GNMA REMIC 2008-8 A 3.612% 11/16/27		09/04/2009	COHEN & CO		5,236,168	5,139,797	4,641
38373M-SX-9	GNMA REMIC SERIES 20065 CLASS A 4.241% 07/16/29		10/07/2009	First Tennessee Bank		2,886,013	2,800,468	3,959
38373M-TL-4	GNMA REMIC Series 2006-8 Class B 4.815% 02/16/30		11/24/2009	Sandler O'Neil		635,695	600,000	2,327
38373M-V2-3	GNMA REMIC SERIES 200845 CLASS A 3.576% 11/16/27		08/19/2009	Goldman Sachs & Co.		928,213	914,074	2,088
38373M-VU-1	GNMA REMIC 2006-39 A 3.772% 06/16/25		09/16/2009	COHEN & CO		2,757,027	2,694,712	5,647
38373Q-J7-7	GNMA REMIC SER 2003-56 DZ (PAC Z) 5.500% 06/16/33		12/01/2009	Interest Capitalization		138,907	138,907	
38373S-LY-1	GNMA REMIC SER 2003-12 OZ (PAC - Z) 5.250% 02/20/33		12/01/2009	Interest Capitalization		29,202	29,202	
38373T-Y5-8	GNMA REMIC SER 2002-9 Z (ACRL-ADJ) 6.803% 12/16/41		12/01/2009	Interest Capitalization		1,072,782	1,072,782	
38374B-JX-2	GNMA REMIC SER 2003-59 Z (PROJ-Z) 6.186% 06/16/43		12/01/2009	Interest Capitalization		1,086,794	1,086,794	
38374C-GS-4	GNMA REMIC SER 2003-76 PZ (PAC Z) 6.000% 09/20/33		12/01/2009	Interest Capitalization		422,241	422,241	
38374E-UE-5	GNMA REMIC SER 2003-98 ZK (PAC-Z) 6.000% 11/20/33		12/01/2009	Interest Capitalization		50,166	50,166	
38374L-5H-0	GOVERNMENT NATIONAL MTG ASSOC Series 2005-60 Class WZ 5.500% 09/20/35		12/01/2009	Interest Capitalization		284,269	284,269	
38374M-CH-0	GNMA Series 2005-83 Class Z 5.000% 10/16/35		12/01/2009	Interest Capitalization		389,056	389,056	
38374M-WL-9	GNMA 62SF 5.5 5.500% 01/20/36		12/01/2009	Interest Capitalization		352,176	352,176	
38375D-LM-8	GNMA REMIC SERIES 200858 CLASS PA 5.500% 06/16/36		05/05/2009	Direct		43,611,869	41,662,136	25,460
38376C-AH-2	GNMA 2009-83 MA 4.500% 10/20/26		09/23/2009	Raymond James & Associates		13,872,335	13,326,771	48,310
<b>3199999. Bonds - U.S. Special Revenues</b>						270,117,982	262,725,869	421,222
00081T-AC-2	ACCO BRANDS CORP 144A 10.625% 03/15/15		09/22/2009	Various		95,139	95,000	
002824-AU-4	ABBOTT LABORATORIES 5.125% 04/01/19		02/27/2009	Various		47,340,500	47,500,000	2,491
00828B-AC-9	AFFINIA GROUP INC 144A 10.750% 08/15/16		08/06/2009	JP Morgan Securities, Inc.		167,958	170,000	
00868P-AA-3	AHOLD LEASE USA INC PTC SER 01-A2 8.620% 01/02/25		09/30/2009	Interest Capitalization		275,341	275,341	
018772-AL-7	ALLIANCE ONE INTL INC 144A 10.000% 07/15/16		10/09/2009	Various		731,510	750,000	7,153
018772-AN-3	ALLIANCE ONE INTL INC 144A 10.000% 07/15/16		08/12/2009	Credit Suisse First Boston		487,500	500,000	7,500
02149D-AJ-8	Countrywide Alt. Loan Trust Series 2006-HY13 Class 3A1 5.911% 01/25/47		01/01/2009	Various		5,277,877	5,256,205	23,483
02916P-AB-9	American Railcar 7.500% 03/01/14		02/09/2009	BNY Capital Markets		354,450	510,000	17,106
032654-AE-5	ANALOG DEVICES 5.000% 07/01/14		12/03/2009	Various		17,004,700	16,087,000	292,256
035290-AJ-4	ANIXTER INTERNATIONAL INC BASIC 1.000% 02/15/13		04/21/2009	Various		3,030,652	4,160,000	11,557
039483-AH-5	ARCHER DANIELS MIDLAND CO 8.375% 04/15/17		11/17/2009	First Tennessee Bank		8,223,636	6,615,000	53,862
039483-AW-2	ARCHER DANIELS MIDLAND CO BASIC 0.875% 02/15/14		05/07/2009	JP Morgan Securities, Inc.		44,962	50,000	106
05523U-AJ-9	BAE SYSTEMS HOLDINGS INC 144A 6.375% 06/01/19		12/14/2009	Various		8,631,730	8,000,000	35,948
055381-AQ-0	BE AEROSPACE, INC BASIC 8.500% 07/01/18		03/31/2009	Various		629,175	755,000	16,340
055776-AG-5	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/13/2009	JP Morgan Securities, Inc.		6,522,141	6,522,141	
055776-AH-3	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/13/2009	JP Morgan Securities, Inc.		6,277,185	6,277,185	
055776-AJ-9	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/12/2009	JP Morgan Securities, Inc.		1,957,606	1,957,606	
055776-AK-6	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/13/2009	JP Morgan Securities, Inc.		1,973,853	1,973,853	
055776-AM-2	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/12/2009	JP Morgan Securities, Inc.		819,216	819,216	
05952C-AA-8	BANC OF AMERICA COMMERCIAL MOR SERIES 20075 CLASS A1 5.175% 02/10/51		05/05/2009	Direct		10,391,844	10,627,347	6,111
05952F-AE-3	BANC OF AMERICA MORTGAGE 2007-2 A5 5.500% 05/25/37		01/01/2009	BOLI-SA Roslyn 00-1		583,596	590,123	1,623
05952H-AG-4	BANC OF AMERICA MTG SECURITIES 2007-1 1A7 5.750% 03/25/37		01/01/2009	Various		6,981,372	6,981,816	30,148
05955F-AA-8	BANC OF AMERICA LARGE LOAN 2009-UB1 5.615% 06/24/50		07/02/2009	Banc of America Securities		9,117,969	11,000,000	12,190
07387M-AE-9	BEAR STEARNS COMMERCIAL MORTGA SERIES 2006P11 CLASS A4 5.455% 03/11/39		01/13/2009	Morgan Stanley & Co., Inc.		421,816	500,000	1,137
07388V-AE-8	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007T26 CLASS A4 5.471% 01/12/45		01/27/2009	Cantor Fitzgerald & Company		11,559,879	14,925,000	65,777
073945-AE-7	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007T28 CLASS A4 5.742% 09/11/42		03/02/2009	JP Morgan Securities, Inc.		6,584,375	10,000,000	6,380
075811-AE-9	BECKMAN COULTER INC 6.000% 06/01/15		06/23/2009	Various		15,579,175	15,250,000	33,125
075811-AF-6	BECKMAN COULTER INC 7.000% 06/01/19		10/21/2009	Various		13,258,879	12,616,000	139,121
081437-AF-2	BEMIS CO INC 6.800% 08/01/19		10/06/2009	Various		39,619,810	37,000,000	190,967
081437-AG-0	BEMIS CO INC 5.650% 08/01/14		07/27/2009	Various		7,756,056	7,500,000	
09348T-AF-5	Blaze Recycling and Metals A1 13.000% 07/16/12		07/29/2009	Tax Free Exchange		500,000	500,000	2,115
097014-AK-0	BOEING CO 3.250% 10/27/14		10/22/2009	Credit Suisse First Boston		9,978,000	10,000,000	
097023-AV-7	BOEING CO 5.000% 03/15/14		03/10/2009	Banc of America Securities		4,977,900	5,000,000	
097023-AW-5	BOEING CO 6.000% 03/15/19		10/09/2009	Various		12,433,596	11,200,000	175,600
120568-AT-7	BUNGE LTD FINANCE CORP 8.500% 06/15/19		06/04/2009	JMP Securities		3,993,880	4,000,000	
12189T-BC-7	BURLINGTON NORTHERN SANTA FE 4.700% 10/01/19		09/21/2009	Barclays Capital, Inc.		9,962,500	10,000,000	
12502C-AS-0	CCH II LLC/CCH II CAP CP 13.500% 11/30/16		12/01/2009	Taxable Exchange		1,512,800	891,458	334
125581-FT-0	CIT GROUP INC 7.000% 05/01/13		12/10/2009	Taxable Exchange		1,769,027	1,980,513	
125581-FU-7	CIT GROUP INC 7.000% 05/01/14		12/10/2009	Taxable Exchange		2,610,742	2,970,770	

E13.1



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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
125581-FV-5	CIT GROUP INC 7.000% 05/01/15		12/10/2009	Taxable Exchange		2,518,010	2,970,770	
125581-FW-3	CIT GROUP INC 7.000% 05/01/16		12/10/2009	Taxable Exchange		4,065,910	4,951,284	
125581-FX-1	CIT GROUP INC 7.000% 05/01/17		12/10/2009	Taxable Exchange		5,559,121	6,931,798	
125896-AW-0	CMS ENERGY HLDG CO 2.875% 12/01/24		04/07/2009	Various		1,309,243	1,300,000	8,196
125896-BD-1	CMS ENERGY HLDG CO 5.500% 06/15/29		11/05/2009	Barclays Capital, Inc.		735,313	725,000	1,661
12620X-AA-0	CPM HOLDINGS INC 144A 10.625% 09/01/14		08/11/2009	Jefferies & Co., Inc.		294,303	300,000	
126694-TX-6	COUNTRYWIDE HOME LOANS 2005-30 A8 5.500% 01/25/36		01/01/2009	BOLI-SA Sovereign Bank 99-1		2,194,908	2,250,000	9,625
126694-IV-6	COUNTRYWIDE HOME LOANS 2006-9 A3 6.000% 05/25/36		01/01/2009	BOLI-SA Roslyn 00-1		1,286,279	1,280,000	5,760
126694-XS-2	COUNTRYWIDE HOME LOANS 2006-9 A12 6.000% 05/25/36		01/01/2009	BOLI-SA Amcore 00-1		501,384	500,000	2,250
12669E-JV-9	COUNTRYWIDE HOME LOANS SER 2003-J5 1A10 (ACRL-SUB) 5.500% 07/25/33		12/01/2009	Interest Capitalization		1,271,595	1,271,595	
12669E-ME-3	COUNTRYWIDE HOME LOANS SER 2003-18 A10 (ACRL-SUB) 5.500% 07/25/33		12/01/2009	Interest Capitalization		260,542	260,542	
12669G-2V-2	Countrywide Home Loans 2005-16 A3 5.500% 09/25/35		01/01/2009	BOLI-SA Staten Island 99-1		1,191,167	1,220,000	5,219
127055-AG-6	CABOT CORP 5.000% 10/01/16		09/25/2009	Various		24,475,730	24,500,000	3,750
131347-BP-0	CALPINE CORP 144A 7.250% 10/15/17		10/21/2009	Tax Free Exchange		1,621,651	2,070,000	2,501
149123-BO-3	CATERPILLAR INC BASIC 7.900% 12/15/18		01/14/2009	Various		20,388,640	17,500,000	154,269
14912L-3U-3	CATERPILLAR FINL SVCS MTN 5.450% 04/15/18		01/22/2009	First Tennessee Bank		12,172,500	12,500,000	193,021
14912L-4D-0	CATERPILLAR FINL SVCS BASIC 7.050% 10/01/18		01/13/2009	Wachovia Bank of Georgia		10,911,200	10,000,000	215,417
14912L-4E-8	CATERPILLAR FINL SVCS 7.150% 02/15/19		09/22/2009	Various		33,706,775	32,500,000	59,583
156431-AE-8	CENTURY ALUMINUM COMPANY BASIC 1.750% 08/01/24		09/14/2009	Pershing/CJS Securities		224,115	425,000	965
159864-AB-3	CHARLES RIVER LABORATI 2.250% 06/15/13		12/17/2009	Various		575,925	625,000	609
165167-CD-7	CHESAPEAKE ENERGY CORP 9.500% 02/15/15		01/28/2009	Deutsche Bank Securities, Inc.		475,355	500,000	
17025A-AL-6	Countrywide Home Loans 2006-17 A11 6.000% 12/25/36		01/12/2009	Goldman Sachs & Co.		4,033,131	9,718,387	22,676
17025A-AL-6	Countrywide Home Loans 2006-17 A11 6.000% 12/25/36		12/01/2009	Interest Capitalization		547,977	547,977	
172973-4J-5	CITICORP MTG SEC INC 2005-8 2A3 5.000% 11/25/20		01/01/2009	BOLI-SA Staten Island 99-1		1,079,482	1,100,000	4,278
173110-BE-9	CITIGROUP COMMERCIAL MORTGAGE SERIES 2007C6 CLASS A1 5.622% 12/10/49		05/05/2009	Direct		8,818,773	8,749,025	5,465
20030N-AZ-4	COMCAST CORP 5.700% 07/01/19		06/15/2009	Bank of America Securities		8,978,670	9,000,000	
20453E-AC-3	COMPLETE PRODUCTION SERVER 8.000% 12/15/16		10/08/2009	Broadpoint		465,000	500,000	13,222
205887-BF-8	CONAGRA FOODS INC 7.000% 04/15/19		04/17/2009	Various		15,649,800	15,000,000	14,583
20825C-AR-5	CONOCOPHILLIPS 5.750% 02/01/19		06/24/2009	Deutsche Bank Securities, Inc.		18,855,360	18,000,000	419,750
216871-AC-7	COOPER US INC BASIC 6.100% 07/01/17		05/08/2009	Barclays Capital, Inc.		5,196,850	5,000,000	111,833
22541Q-ZN-5	CSFB MTGE SECURITIES CORP SER 2003-25 1A9 (ACRL) 5.500% 10/25/33		12/01/2009	Interest Capitalization		110,457	110,457	
22545L-AD-1	CREDIT SUISSE MORTGAGE CAPITAL SERIES 2006-C5 CLASS A3 5.311% 12/15/39		01/01/2009	BOLI-SA Pool #1 MBS		857,512	1,050,000	4,492
225470-AP-8	CS FIRST BOSTON MORTGAGE SECUR SERIES 2005C5 CLASS A4 5.100% 08/15/38		01/29/2009	Credit Suisse First Boston		4,275,000	5,000,000	1,417
226566-AC-1	CRICKET COMMUNICATIONS I 9.375% 11/01/14		10/21/2009	Credit Suisse First Boston		243,125	250,000	11,393
235851-AH-5	DANAHER CORP 5.400% 03/01/19		03/20/2009	Various		51,313,750	50,750,000	72,000
244199-BB-0	DEERE & CO NTS 6.950% 04/25/14		08/20/2009	First Tennessee Bank		21,725,016	18,826,000	436,136
24422E-OR-3	JOHN DEERE CAPITAL CORP MTN 5.350% 04/03/18		09/03/2009	Credit Suisse First Boston		5,327,000	5,000,000	115,917
24422E-QU-6	JOHN DEERE CAPITAL CORP MTN 4.900% 09/09/13		07/21/2009	RBC Dain Rauscher, Inc.		6,334,680	6,000,000	111,067
24422E-QV-4	JOHN DEERE CAPITAL CORP MTN 5.750% 09/10/18		04/24/2009	Dain Bosworth		11,819,208	11,750,000	95,714
24422E-QW-2	JOHN DEERE CAPITAL CORP MTN 5.250% 10/01/12		09/18/2009	Various		10,742,300	10,000,000	206,354
247361-ZC-5	DELTA AIRLINES 144A 9.500% 09/15/14		09/24/2009	JP Morgan Securities, Inc.		192,198	195,000	
247916-AB-5	DENBURY RESOURCES INC 9.750% 03/01/16		02/10/2009	JP Morgan Securities, Inc.		556,896	600,000	
25389M-AB-5	DIGITALGLOBE INC 144A 10.500% 05/01/14		04/21/2009	Morgan Stanley & Co., Inc.		178,098	185,000	
25468P-CK-0	THE WALT DISNEY CO 5.500% 03/15/19		04/02/2009	Various		28,970,780	28,000,000	12,833
25746U-AT-6	DOMINION RESOURCES 2.125% 12/15/23		04/29/2009	Various		952,351	900,000	2,853
263534-BS-7	DUPONT (E1) DE NEMOURS BASIC 5.000% 01/15/13		10/21/2009	Wells Fargo Brokerage Svcs.		13,292,075	12,353,000	173,285
268648-AK-8	EMC CORP MASS BASIC 1.750% 12/01/11		03/10/2009	Various		364,460	375,000	1,236
26882P-BD-3	ERAC USA FINANCE CO Series 144A 5.800% 10/15/12		01/01/2009	BOLI-SA Carolina First 99-1		750,657	750,000	14,983
26884L-AA-7	EQT Corp 8.125% 06/01/19		06/12/2009	Various		50,778,363	48,650,000	168,684
278058-DF-6	EATON CORP 4.900% 05/15/13		12/14/2009	First Tennessee Bank		5,374,500	5,000,000	21,778
291011-AP-9	EMERSON ELECTRIC CO 5.625% 11/15/13		08/18/2009	Wachovia Capital Markets		16,612,800	15,000,000	225,000
291011-AZ-7	EMERSON ELECTRIC CO 4.125% 04/15/15		04/14/2009	JMP Securities		4,987,650	5,000,000	
291011-BA-1	EMERSON ELECTRIC CO 5.000% 04/15/19		04/14/2009	JP Morgan Securities, Inc.		4,952,750	5,000,000	
29379V-AN-3	Enterprise Products 7.000% 06/01/67		10/27/2009	Tax Free Exchange		3,829,017	3,835,000	108,871
294549-AR-1	EQUITABLE RESOURCES INC 6.500% 04/01/18		05/27/2009	JP Morgan Securities, Inc.		11,874,699	12,710,000	137,692
302182-AC-4	EXPRESS SCRIPTS INC 5.250% 06/15/12		06/29/2009	RBC Dain Rauscher, Inc.		4,128,920	4,000,000	13,417
302182-AD-2	EXPRESS SCRIPTS INC 6.250% 06/15/14		07/14/2009	Various		26,623,281	25,890,000	50,056
302182-AE-0	EXPRESS SCRIPTS INC 7.250% 06/15/19		07/14/2009	Various		30,610,749	29,095,000	65,039
32051D-XY-3	FIRST HORIZON ASSET SECURITIES SER 2003-5 1A5 (ACRL) 5.250% 07/25/33		12/01/2009	Interest Capitalization		194,547	194,547	
340711-AO-3	FLORIDA GAS TRANS CO 144A 7.900% 05/15/19		06/23/2009	Various		42,672,615	40,500,000	110,819
35638P-AA-8	FREEDOM GROUP INC 144A 10.250% 08/01/15		07/16/2009	Bank of America Securities		293,481	300,000	
36185N-K9-0	GMAC MTG CORP LOAN SER 2003-J9 A8 (ACRL-NAS) 5.500% 01/25/34		12/01/2009	Interest Capitalization		564,042	564,042	
36246L-AA-9	GS MORTGAGE SECURITIES CORPORA SERIES 2007GG10 CLASS A1 5.690% 08/10/45		05/05/2009	Direct		3,613,442	3,698,648	2,338
362636-AM-4	GSR MORTGAGE LOAN TRUST SERIES 2007ZF CLASS 2A7 5.750% 02/25/37		01/01/2009	BOLI-SA Pool #1 MBS		968,810	985,000	2,832
367905-AE-6	GAYLORD ENTERTAINMENT CO BASIC 3.750% 10/01/14		12/03/2009	Various		851,117	900,000	5,828
36828Q-PW-0	GE Capital Commercial Mtg Corp SERIES 2005C3 CLASS A7A 4.974% 07/10/45		02/06/2009	Deutsche Bank Securities, Inc.		3,971,484	5,000,000	6,908

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
369300-AL-2	GENERAL CABLE CORP BASIC 4.500% 11/15/29		12/18/2009	Taxable Exchange		461,527	490,000	
370334-BB-9	GENERAL MILLS INC 5.700% 02/15/17		02/17/2009	First Tennessee Bank		7,737,902	7,435,000	5,886
370334-BF-0	GENERAL MILLS INC BASIC 5.200% 03/17/15		02/25/2009	First Tennessee Bank		5,078,000	5,000,000	119,167
370334-BH-6	GENERAL MILLS INC 5.650% 02/15/19		01/29/2009	JP Morgan Securities, Inc.		6,993,980	7,000,000	
377372-AC-1	GLAXOSMITHKLINE CAP INC 4.850% 05/15/13		03/04/2009	JP Morgan Securities, Inc.		8,512,005	8,191,000	125,800
382388-AP-1	GOODRICH CORPORATION 7.625% 12/15/12		10/21/2009	Bank of America Securities		3,237,885	2,850,000	79,078
382388-AS-5	GOODRICH CORP 6.290% 07/01/16		10/27/2009	Bank of America Securities		3,347,006	3,070,000	63,831
382388-AV-8	GOODRICH CORPORATION 6.125% 03/01/19		09/14/2009	JP Morgan Securities, Inc.		3,252,450	3,000,000	8,167
404119-BA-6	HCA - THE HEALTHCARE CO BASIC 9.625% 11/15/16		05/15/2009	Interest Capitalization		51,832	51,832	
404119-BB-4	HCA - THE HEALTHCARE CO 144A 9.875% 02/15/17		02/11/2009	Bank of America Securities		96,673	100,000	
41242*-AG-7	HARDWOOD FUND PRIVATE PLACEMENT 8.270% 02/27/16		02/04/2009	Bank of America Securities		20,000,000	20,000,000	
413875-AJ-4	HARRIS CORPORATION 5.000% 10/01/15		02/10/2009	JP Morgan Securities, Inc.		4,147,300	5,000,000	91,667
413875-AL-9	HARRIS CORPORATION 6.375% 06/15/19		06/24/2009	Various		27,572,552	27,000,000	30,387
418056-AR-8	HASBRO INC 6.125% 05/15/14		09/29/2009	Various		42,360,166	41,440,000	196,589
42210P-AM-4	HEADWATERS INC 144A 11.375% 11/01/14		10/22/2009	Deutsche Bank Securities, Inc.		402,384	400,000	
42307T-AH-1	HEINZ H J CO 144A 7.125% 08/01/39		09/22/2009	RBC Dain Rauscher, Inc.		40,052,050	34,000,000	364,365
427093-AB-5	Hercules Offshor 144A 10.500% 10/15/17		10/08/2009	UBS Securities		243,458	250,000	
427866-AO-1	HERSHEY FOOD CORP 5.000% 04/01/13		07/14/2009	Bank of America Securities		5,316,750	5,000,000	73,611
431318-AC-8	HILCORP ENERGY Series 144A 7.750% 11/01/15		09/17/2009	Jefferies & Co., Inc.		421,875	450,000	13,659
438516-AX-4	HONEYWELL INC BASIC 5.300% 03/01/18		10/07/2009	First Tennessee Bank		3,092,307	2,850,000	17,623
438516-AZ-9	HONEYWELL INC 5.000% 02/15/19		10/02/2009	Various		20,582,700	20,000,000	71,528
441060-AJ-9	HOSPIRA INC 6.050% 03/30/17		08/18/2009	Various		10,333,585	10,700,000	235,345
450679-BW-4	ITT CORP 4.900% 05/01/14		05/06/2009	Various		39,327,761	39,050,000	24,194
450679-BX-2	ITT CORP 6.125% 05/01/19		10/06/2009	Various		28,975,132	28,235,000	151,551
452308-AH-2	ILLINOIS TOOL WORKS 5.150% 04/01/14		09/21/2009	Tax Free Exchange		39,971,072	40,000,000	1,001,389
452308-AJ-8	Illinois Tool Works Inc 6.250% 04/01/19		09/21/2009	Tax Free Exchange		49,661,056	49,600,000	1,506,944
45660N-QW-8	RESIDENTIAL ASSET SECURITIZATI SER 2003-A6 A6 (ACRL-SUB) 5.500% 07/25/33		12/01/2009	Interest Capitalization		517,253	517,253	
465685-AE-5	ITC HOLDINGS CORP 144A 6.050% 01/31/18		04/16/2009	Wachovia Capital Markets		9,019,382	10,150,000	132,285
46630G-BC-8	JP MORGAN MORTGAGE TRUST 5.290% 07/25/35		01/01/2009	Various		5,611,796	5,646,756	22,422
46630P-AP-0	JP MORGAN MORTGAGE TRUST 2007-A2 3A1 5.815% 04/25/37		01/01/2009	BOLI-SA Allfirst 99-1		1,891,119	1,901,382	8,334
47102X-AF-2	JANUS CAPITAL GROUP INC 6.950% 06/15/17		05/21/2009	Credit Suisse First Boston		1,011,488	1,425,000	39,406
487836-AT-5	KELLOGG COMPANY UNSEC'D DEBS SER B 7.450% 04/01/31		09/15/2009	JP Morgan Securities, Inc.		15,593,233	12,070,000	417,136
487836-BA-5	KELLOGG COMPANY 4.250% 03/06/13		03/10/2009	First Tennessee Bank		5,014,850	5,000,000	4,132
487836-BB-3	KELLOGG COMPANY 4.450% 05/30/16		05/18/2009	JP Morgan Securities, Inc.		4,986,800	5,000,000	
501044-BK-6	KROGER CO SR NOTES 7.000% 05/01/18		04/21/2009	Dain Bosworth		12,247,385	11,500,000	386,847
501044-CG-4	KROGER CO BASIC 6.400% 08/15/17		03/31/2009	Various		8,770,385	8,500,000	66,933
501044-CL-3	KROGER CO 7.500% 01/15/14		03/30/2009	Dain Bosworth		15,409,520	14,000,000	224,583
50212A-AB-2	L-1 IDENTITY SOLUTIONS I 3.750% 05/15/27		03/25/2009	Merrill Lynch		330,000	500,000	7,031
521ESC-90-8	Lear Corp BASIC 0.000% 12/01/16		11/18/2009	Direct			2,750,000	
532457-BD-9	LILLY (ELI) & CO. 3.550% 03/06/12		03/03/2009	Deutsche Bank Securities, Inc.		1,997,960	2,000,000	
55265K-QH-5	MASTR ASSET SECURITIZATION TRU SER 2003-1 2A13 (ACRL) 5.750% 02/25/33		12/01/2009	Interest Capitalization		95,243	95,243	
55274S-AK-7	MASTER ASSET SECURITIZATION 2006-3 1A10 6.000% 10/25/36		01/01/2009	BOLI-SA Sovereign Bank 99-1		811,903	810,571	3,648
565849-AF-3	MARATHON OIL CORP 5.900% 03/15/18		04/21/2009	First Tennessee Bank		9,613,100	10,000,000	63,917
565849-AG-1	MARATHON OIL CORP 6.500% 02/15/14		03/27/2009	Various		11,069,136	10,927,000	67,851
565849-AH-9	MARATHON OIL CORP 7.500% 02/15/19		04/03/2009	Various		35,393,596	34,850,000	104,656
579489-AA-3	MCCLATCHY CO 144A 15.750% 07/15/14		06/26/2009	Taxable Exchange		1,256,120	3,348,000	
58013M-EG-5	MCDONALD'S CORP MTN 5.000% 02/01/19		01/13/2009	JP Morgan Securities, Inc.		4,998,300	5,000,000	
581557-AW-5	MCKESSON CORP 6.500% 02/15/14		02/23/2009	Dain Bosworth		2,067,440	2,000,000	5,056
581557-AX-3	MCKESSON CORP 7.500% 02/15/19		02/25/2009	Various		11,679,291	11,325,000	26,354
601073-AD-1	MILLIPORE CORP BASIC 3.750% 06/01/26		12/09/2009	Various		2,671,876	2,775,000	17,828
61750C-AF-4	MORGAN STANLEY CAPITAL I SERIES 2006HQ9 CLASS A4 5.731% 07/12/44		02/02/2009	BB&T Capital Markets		5,297,461	7,500,000	4,776
61750H-AE-6	MORGAN STANLEY CAPITAL I SERIES 2006HQ10 CLASS A4 5.328% 11/12/41		03/11/2009	Morgan Keegan & Co., Inc.		214,500	330,000	733
653522-DG-2	NIAGARA MOHAWK PWR CORP 144A 3.553% 10/01/14		09/21/2009	JP Morgan Securities, Inc.		2,000,000	2,000,000	
65475F-AF-2	NISSAN AUTO RECEIVABLES OWNER SERIES 2008A CLASS A4 4.280% 06/16/14		05/05/2009	Direct		12,071,267	12,000,000	28,533
65543A-AB-0	NORANDA ALUMINUM ACQ 5.274% 05/15/15		11/15/2009	Interest Capitalization		152,445	152,445	
65543A-AB-0	NORANDA ALUMINUM ACQ 5.274% 05/15/15		01/01/2009	Tax Free Exchange		5	385,000	11,368
666807-AT-9	NORTHROP-GRUMMAN CORP NTS 7.125% 02/15/11		04/01/2009	Dain Bosworth		5,351,900	5,000,000	50,469
666807-BA-9	NORTHROP-GRUMMAN CORP 5.050% 08/01/19		12/10/2009	First Tennessee Bank		10,482,700	10,000,000	189,375
67019E-AB-3	NSTAR 4.500% 11/15/19		11/12/2009	Bank of America Securities		4,958,350	5,000,000	
681904-AL-2	ONIVICARE INC BASIC 3.250% 12/15/35		07/23/2009	Barclays Capital, Inc.		185,120	250,000	970
693304-AL-1	PECO ENERGY CO 5.350% 03/01/18		11/23/2009	First Tennessee Securities		9,219,015	8,500,000	112,424
693320-AJ-2	PHH CORP BASIC 4.000% 09/01/14		12/31/2009	Deutsche Bank Securities, Inc.		142,346	150,000	1,617
693506-BA-4	PPG INDUSTRIES 5.750% 03/15/13		03/03/2009	Various		20,282,152	20,137,000	473,405
693506-BB-2	PPG INDUSTRIES 6.650% 03/15/18		06/04/2009	Various		35,118,062	34,640,000	816,731
707882-AA-4	PENN VIRGINIA CORP 4.500% 11/15/12		12/30/2009	Various		1,145,302	1,225,000	5,663
716495-AH-9	PETROHAWK ENERGY CORP 10.500% 08/01/14		10/22/2009	Tax Free Exchange		340,900	370,000	8,741

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
717081-DB-6	PFIZER INC 6.200% 03/15/19		03/17/2009	Goldman Sachs & Co.		14,984,850	15,000,000	
727610-AE-7	PLASTIPAK HOLDINGS INC 144A 10.625% 08/15/19		07/23/2009	JP Morgan Securities, Inc.		469,147	480,000	
74913G-AW-5	QWEST CORP 144A 8.375% 05/01/16		12/18/2009	Tax Free Exchange		930,319	1,000,000	10,934
751028-AA-9	RALCORP HOLDINGS CORP 144A 7.290% 08/15/18		04/28/2009	JP Morgan Securities, Inc.		13,748,700	14,000,000	215,460
751028-DF-5	RALCORP HOLDINGS PRIVATE PLACEMENT 7.450% 05/28/19		04/23/2009	JP Morgan Securities, Inc.		10,650,000	10,650,000	
758202-AF-2	REED ELSEVIER CAPITAL 7.750% 01/15/14		01/13/2009	Barclays Capital, Inc.		29,923,200	30,000,000	
771196-AQ-5	ROCHE HLDGS INC 144A 5.000% 03/01/14		02/18/2009	JP Morgan Securities, Inc.		42,290,724	42,600,000	
771196-AS-1	ROCHE HLDGS INC 144A 6.000% 03/01/19		02/18/2009	Bank of America Securities		37,993,208	38,600,000	
78355H-JH-3	RYDER SYSTEM INC MTN 5.000% 06/15/12		07/09/2009	Credit Suisse First Boston		6,266,210	6,225,000	25,073
78355H-JL-4	RYDER SYSTEM INC MTN 5.850% 03/01/14		07/09/2009	Credit Suisse First Boston		10,055,000	10,000,000	216,125
78355H-JM-2	RYDER SYSTEM INC MTN 6.000% 03/01/13		10/02/2009	Various		8,667,296	8,400,000	123,733
786514-BM-0	SAFEWAY INC 5.625% 08/15/14		03/13/2009	JP Morgan Securities, Inc.		14,806,965	14,500,000	74,766
786514-BQ-1	SAFEWAY INC 6.250% 03/15/14		02/26/2009	First Tennessee Bank		5,191,150	5,000,000	61,632
80874Y-AG-5	SCIENTIFIC GAMES INTERNA 9.250% 06/15/19		10/30/2009	Tax Free Exchange		377,974	390,000	15,933
80874Y-AH-3	SCIENTIFIC GAMES INTERNA 144A 9.250% 06/15/19		10/30/2009	JP Morgan Securities, Inc.		203,051	200,000	8,376
832248-AR-9	SMITHFIELD FOODS INC 4.000% 06/30/13		08/05/2009	Various		589,289	700,000	9,633
833034-AH-4	SNAP-ON INC. 6.125% 09/01/21		12/04/2009	Various		8,166,480	7,700,000	107,783
834376-AK-1	SOLUTIA INC 8.750% 11/01/17		10/09/2009	Deutsche Bank Securities, Inc.		250,000	250,000	
84263P-AC-4	SOUTHERN CONN GAS 7.950% 08/03/26		02/26/2009	Tax Free Exchange		8,700,000	8,700,000	21,134
843646-AC-4	SOUTHERN POWER CO B 6.250% 07/15/12		07/14/2009	First Tennessee Bank		7,608,160	7,000,000	2,431
843646-AF-7	SOUTHERN POWER CO BASIC 4.875% 07/15/15		12/09/2009	Various		17,625,212	16,600,000	298,377
855030-AH-5	STAPLES BASIC 7.375% 10/01/12		07/09/2009	First Tennessee Bank		3,993,825	3,750,000	79,128
855030-AJ-1	STAPLES BASIC 9.750% 01/15/14		08/31/2009	Various		47,587,065	42,547,000	659,497
86881R-AA-1	Surgical Care Affiliates Series 144A 8.875% 07/15/15		07/15/2009	Direct		52,696	52,696	
881448-AG-9	TERREMARK WORLDWIDE INC 144A 12.000% 06/15/17		06/17/2009	Credit Suisse First Boston		661,181	695,000	
881609-AW-1	TESORO PETROLEUM CORP 9.750% 06/01/19		10/05/2009	Various		1,408,954	1,400,000	21,288
884315-AG-7	THOMAS & BETTS CORP 5.625% 11/15/21		11/16/2009	Bank of America Securities		9,918,600	10,000,000	
88633P-AB-0	TICKETMASTER ONLINE-CITY - B 10.750% 08/01/16		08/11/2009	JP Morgan Securities, Inc.		321,387	325,000	
88633P-AB-0	TICKETMASTER ONLINE-CITY - B 10.750% 08/01/16		07/29/2009	Tax Free Exchange		1,260,000	1,260,000	66,973
88732J-AV-0	Time Warner Cable - A 3.500% 02/01/15		12/08/2009	Deutsche Bank Securities, Inc.		4,967,650	5,000,000	
896522-AF-6	TRINITY INDUSTRIES 3.875% 06/01/36		12/18/2009	Various		1,197,450	1,575,000	17,193
9021EQ-AD-6	Tyco/tyco intl fin sa 6.875% 01/15/21		12/15/2009	Morgan Stanley & Co., Inc.		12,463,440	11,000,000	321,406
902549-AE-4	UAL CORP 5.000% 02/01/21		01/14/2009	Pershing/GJS Securities		26,250	50,000	139
903293-AV-0	USG CORP 144A 9.750% 08/01/14		07/30/2009	JP Morgan Securities, Inc.		686,602	700,000	
90333E-AC-2	USEC INC 3.000% 10/01/14		12/21/2009	Various		3,239,202	4,900,000	18,665
90338W-AK-9	US ONCOLOGY INC 9.125% 08/15/17		12/15/2009	Tax Free Exchange		489,946	500,000	15,208
904201-AA-8	UMBRELLA ACQUISITION Series 144A 9.750% 03/15/15		09/15/2009	Interest Capitalization		262,500	262,500	
907818-AZ-1	UNION PACIFIC CORP BONDS 7.000% 02/01/16		02/03/2009	Dain Bosworth		5,296,750	5,000,000	4,861
907818-DB-1	UNION PACIFIC CORP BASIC 7.875% 01/15/19		01/29/2009	Dain Bosworth		12,468,700	11,000,000	29,094
909205-AB-2	Unisource Energy Corp 4.500% 03/01/35		01/26/2009	Various		174,938	200,000	3,388
911312-AK-2	UNITED PARCEL SERVICE - CL B 5.125% 04/01/19		03/19/2009	JP Morgan Securities, Inc.		37,473,375	37,500,000	
911312-AL-0	UNITED PARCEL SERVICE - CL B 3.875% 04/01/14		03/19/2009	Citigroup Global Markets		39,911,200	40,000,000	
913017-BO-1	UNITED TECHNOLOGIES BASIC 6.125% 02/01/19		10/20/2009	Barclays Capital, Inc.		17,072,700	15,000,000	209,271
920355-AD-6	VALSPAR CORP 5.625% 05/01/12		08/13/2009	Bank of America Securities		5,179,000	5,000,000	83,594
920355-AF-1	VALSPAR CORP 7.250% 06/15/19		06/24/2009	Various		26,109,670	26,000,000	22,153
92336G-99-9	VERASUN ENERGY Escrow - Priced at 0 0.000% 12/15/12		04/23/2009	Direct			720,000	
92344S-AJ-9	VERIZON WIRELESS 7.375% 11/15/13		11/15/2009	Tax Free Exchange		14,898,159	15,000,000	
92344S-AK-6	VERIZON WIRELESS 8.500% 11/15/18		11/15/2009	Tax Free Exchange		29,153,913	25,000,000	
92922F-RE-0	WASHINGTON MUTUAL SER 2004-CB1 3A3 (ACRL) 5.500% 06/25/34		12/01/2009	Interest Capitalization		312,302	312,302	
931422-AE-9	WALGREEN CO BASIC 5.250% 01/15/19		01/08/2009	Bank of America Securities		14,921,550	15,000,000	
94984H-AA-3	Wells Fargo Series 2006-12 A1 6.000% 10/25/36		01/01/2009	Various		557,623	557,617	1,301
961548-AQ-7	WESTVACO CORP DEB 7.650% 03/15/27		01/01/2009	BOLI-SA Sovereign Bank 99-1		2,142,346	2,035,000	66,595
962166-AW-4	WEYERHAEUSER CO DEBS 6.950% 10/01/27		01/01/2009	BOLI-SA Staten Island 99-1		3,258,338	3,500,000	79,056
971807-AC-6	WILMINGTON TRUST CORPORATION NTS 4.875% 04/15/13		01/01/2009	BOLI-SA Sovereign Bank 99-1		4,831,502	5,000,000	40,625
989701-AM-9	ZIONS BANCORP BASIC 5.500% 11/16/15		01/01/2009	Various		8,641,488	8,700,000	62,853
BL5336-55-9	Gentek Holding 7.250% 10/29/14		10/28/2009	Goldman Sachs & Co.		294,000	300,000	
BL5409-55-4	BL Cit Group Exp Bank Loans 9.500% 01/18/12		10/26/2009	Bank of America Securities		950,000	1,000,000	
BL5427-65-5	Michaels Stores Bank Loans 4.812% 07/31/16		11/30/2009	Tax Free Exchange		446,880	570,759	903
BL5502-45-7	TASC Inc. Term Loan A 0.000% 12/18/14		12/14/2009	Robert W. Baird & Co., Inc.		89,100	90,000	
BL5502-49-9	TASC Inc. Term Loan B 5.750% 12/18/14		12/14/2009	Robert W. Baird & Co., Inc.		178,200	180,000	
LN0135-81-1	BL CHARTER COMM CHARTER COMMUNICATIONS 2.260% 09/06/14		01/06/2009	JP Morgan Securities, Inc.		747,650	964,710	
LN1953-14-7	Vought Aircraft Company Bank Loan 0.234% 12/22/11		04/17/2009	Citigroup Global Markets		137,916	172,395	
LN1986-74-1	Accuride Corporation Bank Loan Bank Loan 10.000% 01/31/12		08/19/2009	Morgan Stanley & Co., Inc.		561,000	600,000	
LN2303-11-0	Neiman Marcus Group Inc Bank Loans 2.255% 04/06/13		06/02/2009	Credit Suisse First Boston		294,102	393,448	
LN2430-43-4	BL PANAMSAT 2.914% 01/03/14		01/01/2009	Prior Period Adjustment		(1,277,000)	(1,555,000)	
LN2641-10-5	BL SENSATA TLB 2.031% 04/27/13		02/24/2009	Citigroup Global Markets		422,832	924,223	

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
LN2710-10-8	BL LTD COMP INC Bank Loan 2.250% 06/30/12		02/02/2009	Barclays Capital, Inc.		1,250,145	1,750,000	
LN2849-00-5	NIELSEN FINANCE LLC/CO 2.188% 08/09/13		01/29/2009	Credit Suisse First Boston		605,590	749,957	
LN2915-11-1	WESCO AIRCRAFT H Bank Loans 0.187% 03/29/14		08/19/2009	Barclays Capital, Inc.		497,500	700,000	
LN2966-30-4	REYNOLDS & REYNOLDS CO Bank Loans 6.250% 04/24/14		11/02/2009	Credit Suisse First Boston		207,900	210,000	
LN3029-72-2	FREESCALE SEMICONDUCTOR INC Bank Loans 1.985% 12/01/13		06/16/2009	Various		477,594	626,747	
LN3032-49-4	FORD MOTOR COMPANY Bank Loan 3.289% 12/16/13		06/08/2009	Various		958,352	1,448,302	
LN3034-50-8	BL REVLON CONSUM Bank Loans 4.277% 01/15/12		06/05/2009	Citigroup Global Markets		1,337,500	1,500,000	
68824B-AJ-5	OSHKOSH TRUCK Bank Loans 6.277% 12/06/13		07/27/2009	Banc of America Securities		208,134	210,236	
LN3039-03-6	BL MOMENTIVE TL 0.078% 12/04/13		02/26/2009	JP Morgan Securities, Inc.		754,587	992,877	
LN3129-21-7	BUILDING MAT COR Bank Loans 3.000% 02/22/14		07/10/2009	Goldman Sachs & Co.		422,878	497,503	
LN3161-09-5	BL OPEN SOLUTION TB Bank Loan 2.405% 01/23/14		03/26/2009	Various		504,373	994,773	
LN3194-71-6	BL WEST CORP TLB Bank Loan 2.608% 12/24/13		02/09/2009	Various		1,437,644	1,979,644	
LN3210-88-4	LEVEL 3 COMM INC Bank Loans 2.530% 03/13/14		06/16/2009	Banc of America Securities		341,000	400,000	
LN3237-17-6	Consolidate Container Co 0.078% 03/28/14		06/05/2009	Deutsche Bank Securities, Inc.		429,190	496,173	
LN3246-74-8	Harland Clarke Holdings Bank Loan 0.034% 06/30/14		05/26/2009	Various		902,462	1,240,458	
LN3281-04-2	Pinnacle Foods Finance Bank Loan 2.985% 04/02/14		06/02/2009	Morgan Stanley & Co., Inc.		309,990	347,328	
LN3286-03-3	BERRY PLASTICS Bank Loans 2.254% 04/03/15		07/27/2009	Citigroup Global Markets		338,261	397,954	
LN3311-68-2	VERINT SYSTEMS Bank Loans 3.490% 05/25/14		06/18/2009	Barclays Capital, Inc.		870,000	1,000,000	
LN3319-68-5	VERTRUE INC Bank Loans 0.035% 08/18/14		07/28/2009	Barclays Capital, Inc.		410,000	500,000	
LN3319-80-0	VERTRUE INC Bank Loan 0.079% 08/14/15		10/01/2009	Barclays Capital, Inc.		156,800	245,000	
LN3337-14-1	VENOCO INC Bank Loans 4.250% 09/20/11		08/12/2009	Barclays Capital, Inc.		236,250	300,000	
LN3337-30-7	SWIFT TRANS CO Bank Loans 0.000% 05/10/14		06/26/2009	Credit Suisse First Boston		382,500	500,000	
LN3343-09-9	Michaels Stores Inc Bank Loan 2.562% 10/31/13		05/13/2009	Deutsche Bank Securities, Inc.		322,325	424,112	
LN3385-88-4	Rite Aid Corp Bank Loans 1.148% 06/04/14		04/30/2009	Various		1,018,390	1,240,530	
LN3411-16-9	ASURION CORP Bank Loan 3.244% 07/07/14		03/02/2009	Banc of America Securities		1,129,669	1,496,250	
LN3411-24-3	ASURION CORP Bank Loans 6.734% 07/07/15		07/15/2009	Banc of America Securities		182,000	200,000	
LN3411-40-9	BLCOMMUNITYLTH PRIVATE PLACEMENT 3.098% 07/25/14		01/01/2009	Prior Period Adjustment		(1,617,500)	(2,000,000)	
LN3452-87-4	Novellis Strip BL NOVELUS STRIP 0.044% 07/06/14		01/14/2009	Credit Suisse First Boston		265,350	435,000	
LN3522-96-5	ALLISON TRANS Bank Loans 6.302% 08/07/14		05/28/2009	Citigroup Global Markets		480,293	621,739	
LN3532-96-4	AEROFLEX INC 3.562% 08/15/14		07/20/2009	Deutsche Bank Securities, Inc.		820,242	990,927	
LN3605-19-0	First Data Corporation Bank Loan 1.863% 09/24/14		04/30/2009	Credit Suisse First Boston		1,103,366	1,488,579	
LN3634-53-9	CDW Corp Bank Loan 4.234% 10/12/14		05/13/2009	Barclays Capital, Inc.		746,762	1,082,264	
LN3634-69-5	Energy Future Holdings 3.735% 10/10/14		11/06/2009	Various		753,438	1,075,000	
LN3647-53-1	NUVEEN INVESTM Bank Loans 3.281% 11/13/14		06/24/2009	Deutsche Bank Securities, Inc.		348,344	455,352	
LN3684-91-4	SEQUA CORP Bank Loan 3.887% 12/03/14		01/30/2009	Citigroup Global Markets		777,366	1,168,971	
LN3764-54-2	BL FED MOGUL STR 2.167% 12/27/14		06/11/2009	Citigroup Global Markets		280,294	410,687	
LN3764-58-3	BL FED MOGUL STR Bank Loans 2.167% 12/27/15		06/11/2009	Citigroup Global Markets		143,029	209,566	
LN3775-66-2	SOLUTIA INC Bank Loans 7.151% 02/28/14		06/18/2009	Deutsche Bank Securities, Inc.		340,051	369,620	
LN3782-14-8	BL CALPINE TLB Bank Loan 3.135% 03/29/14		05/06/2009	Goldman Sachs & Co.		361,679	410,998	
LN4025-71-1	FOX ACQUISITION SUB LLC Bank Loans 0.080% 07/14/15		07/08/2009	Deutsche Bank Securities, Inc.		412,550	548,771	
LN4389-26-5	Freescal Semiconductor Inc 12.500% 12/15/14		03/17/2009	Taxable Exchange		925,639	1,832,949	
LN4730-24-5	Rite Aid Corp 0.297% 06/10/15		06/05/2009	Citigroup Global Markets		988,800	1,030,000	
39121J-AA-1	GREAT RIVER ENRG PRIVATE PLACEMENT 5.810% 07/01/21		08/13/2009	Keybank MCD		14,400,000	14,400,000	
PP330T-L3-7	SOUTHERN LNG INC PRIVATE PLACEMENT 9.750% 02/24/16		02/06/2009	Various		14,000,000	14,000,000	
PP3909-07-2	CAIT LONG PRIVATE PLACEMENT 5.710% 01/15/32		01/15/2009	Tax Free Exchange		10,900,000	10,900,000	
PP390A-RJ-4	Major League Baseball Trust Private Placement 4.270% 12/08/15		11/20/2009	Banc of America Securities		19,600,000	19,600,000	
PP332-TR-6	BRSP LLC Bank Loans 7.500% 06/30/14		06/23/2009	Barclays Capital, Inc.		431,532	459,077	
PP332-TS-4	Quebecor Bank Loans 9.163% 06/30/12		06/29/2009	Credit Suisse First Boston		530,041	588,935	
PP332-UV-5	CASELLA WASTE 0.304% 03/31/14		07/01/2009	Banc of America Securities		357,305	378,100	
PP4F1E-AE-9	OMEGA LEASING LLC PRIVATE PLACEMENT 5.980% 07/16/16		06/03/2009	Royal Bank of Scotland		7,134,372	7,134,372	
PP4Q1N-ZG-3	Army air force exchange srvc PRIVATE PLACEMENT 5.740% 06/17/14		05/21/2009	JP Morgan Securities, Inc.		5,700,000	5,700,000	
13861F-AD-9	CANTOR FITZ LLP PRIVATE PLACEMENT 9.000% 07/01/16		07/01/2009	Various		15,000,000	15,000,000	
748426-AA-3	QUIKRETE HOLDING PRIVATE PLACEMENT 5.830% 12/15/19		11/04/2009	Wells Fargo Securities LLC		10,000,000	10,000,000	
PP5P0M-QQ-5	Chicago Baseball Holdings LLC Private Placement 6.790% 10/26/17		09/25/2009	Banc of America Securities		11,000,000	11,000,000	
PP6Q0M-ZP-4	BL SKYPE TECH Bank Loans 3.240% 10/19/14		11/12/2009	JP Morgan Securities, Inc.		336,375	345,000	
PP6Q0N-OE-5	TRANSWSTRN PIPE PRIVATE PLACEMENT 5.360% 12/09/20		11/13/2009	Banc of America Securities		12,500,000	12,500,000	
000000-00-0	BL LEAR EXIT TLB PRIVATE PLACEMENT 3.646% 11/05/14		10/21/2009	JP Morgan Securities, Inc.		143,859	145,313	
000000-00-0	BL Sinclair Tlb PRIVATE PLACEMENT 6.500% 10/13/15		10/23/2009	JP Morgan Securities, Inc.		338,100	345,000	
009037-AM-4	AINSWORTH LUMBER 144A 11.000% 07/29/15	A.	06/30/2009	Direct		73,227	40,199	
009037-AM-4	AINSWORTH LUMBER 144A 11.000% 07/29/15	A.	12/30/2009	Interest Capitalization		41,202	41,202	
136375-BT-8	CANADIAN NAT'L RAILWAY 5.550% 03/01/19	A.	02/18/2009	JP Morgan Securities, Inc.		12,360,125	12,500,000	
136385-AB-7	CANADIAN NATL RESOURCES NTS 6.700% 07/15/11	A.	01/01/2009	BOLI-SA BBAT2 06-1		491,471	475,000	3,006
136385-AN-1	CANADIAN NATL RESOURCES 5.900% 02/01/18	A.	12/01/2009	First Tennessee Bank		10,923,600	10,000,000	201,583
496902-AB-3	KINROSS GOLD CORP Series 144A 1.750% 03/15/28	A.	03/23/2009	Various		1,233,711	1,325,000	9,792
496902-AD-9	KINROSS GOLD CORP 1.750% 03/15/28	A.	12/21/2009	Various		251,122	250,000	1,074
552697-AD-6	MDC PARTNERS INC 144A 11.000% 11/01/16	A.	10/20/2009	Goldman Sachs & Co.		476,680	500,000	

E13.5

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
73755L-AE-7	POTASH CORP-SASKATCHEWAN 5.250% 05/15/14	A	10/30/2009	Various		22,668,420	21,000,000	551,104
73755L-AF-4	POTASH CORP-SASKATCHEWAN 6.500% 05/15/19	A	11/30/2009	Various		21,308,247	18,918,000	257,386
748ESC-AC-4	Quebecor Notes 4.875% 11/12/39	A	09/03/2009	Direct			8,000,000	
878742-AM-7	TECKCOMINCO LTD WI 10.250% 05/15/16	I	08/19/2009	Tax Free Exchange		370,902	370,000	10,640
884903-BA-2	THOMSON CORPORATION BASIC 5.950% 07/15/13	A	02/26/2009	Credit Suisse First Boston		7,401,000	7,500,000	59,500
887147-AD-8	TIMBERWEST FOREST CRP 9.000% 02/11/14	C	02/06/2009	Direct		3,773	2,406	
887147-AD-8	TIMBERWEST FOREST CRP 9.000% 02/11/14	C	10/15/2009	Interest Capitalization		46	46	
LN3627-44-2	Telesat Canada Inc. 3.240% 10/23/14	A	10/05/2009	Morgan Stanley & Co., Inc.		35,226	36,836	
LN3627-48-3	Telesat Canada Inc. 3.240% 10/23/14	A	10/05/2009	Morgan Stanley & Co., Inc.		3,026	3,164	
03512Q-AA-5	Anglogold Holdings 144A 3.500% 05/22/14	F	07/02/2009	Various		616,250	600,000	1,964
055451-AG-3	BHP BILLITON FIN USA LTD 5.500% 04/01/14	F	11/17/2009	First Tennessee Bank		8,304,375	7,500,000	56,146
055650-BJ-6	BP Capital PLC 4.750% 03/10/19	F	03/05/2009	Goldman Sachs & Co.		34,100,612	34,100,000	
143658-AN-2	CARNIVAL CORP 2.000% 04/15/21	F	08/20/2009	Various		720,688	750,000	4,408
204386-AL-0	CIE GEN GEOPHYSIQUE 144A 9.500% 05/15/16	F	06/02/2009	Credit Suisse First Boston		484,760	500,000	
25243Y-AM-1	DIAGEO CAPITAL PLC DIAGEO CAP PLC 5.750% 10/23/17	F	10/29/2009	Credit Suisse First Boston		8,128,511	7,478,000	11,944
25243Y-AN-9	DIAGEO CAPITAL PLC DIAGEO CAP PLC 7.375% 01/15/14	F	02/12/2009	Credit Suisse First Boston		5,665,200	5,000,000	119,844
26054C-BR-3	DOW CAPITAL BV NOTES SER G 8.640% 06/01/22	F	01/01/2009	BOLI-SA First Hawaii		601,607	500,000	9,360
302203-AA-2	Expro Finance Luxembourg Series 144A 8.500% 12/15/16	F	12/14/2009	Goldman Sachs & Co.		548,380	570,000	
37932J-AB-9	GLOBAL CROSSING LTD 144A 12.000% 09/15/15	F	09/11/2009	Goldman Sachs & Co.		685,402	710,000	
500472-AB-1	PHILIPS ELECTRONICS NV 5.750% 03/11/18	F	02/04/2009	Dain Bosworth		3,370,430	3,500,000	82,736
636274-AC-6	NATL GRID PLC 6.300% 08/01/16	F	02/10/2009	Cantor Fitzgerald & Company		4,833,800	5,000,000	10,500
81180V-AA-1	SEAGATE TECHNOLOGY INTL 144A 10.000% 05/01/14	F	04/16/2009	JP Morgan Securities, Inc.		857,853	900,000	
822582-AJ-1	SHELL INTERNATIONAL FIN 4.300% 09/22/19	F	09/15/2009	Morgan Stanley & Co., Inc.		9,666,438	9,700,000	
881575-AA-2	TESCO PLC-ADR 144A 5.500% 11/15/17	F	02/25/2009	Various		16,491,035	16,500,000	238,410
902118-BK-3	TYCO INT'L 6.000% 11/15/13	F	10/08/2009	Bank of America Securities		2,875,661	2,625,000	65,188
902118-BL-1	TYCO INT'L 8.500% 01/15/19	F	09/01/2009	Various		8,633,180	8,000,000	34,708
902118-BM-9	TYCO INT'L 4.125% 10/15/14	F	10/15/2009	Various		16,052,732	15,900,000	14,956
915436-AE-9	UPM-Kymmene Corp Series 144A 5.625% 12/01/14	F	01/01/2009	BOLI-SA Star Bank 00-1		1,174,406	1,150,000	2,516
BL5073-41-8	Warner Chilcott 0.070% 10/30/14	F	10/14/2009	Bank of America Securities		77,186		
BL5073-49-1	Warner Chilcott Bank Loans 0.073% 04/30/15	R	10/14/2009	Bank of America Securities		123,498	124,746	
LN3623-11-0	Flextronics Semiconductor 2.447% 10/01/14	F	10/30/2009	Credit Suisse First Boston		98,050	104,866	
LN3623-15-1	Flextronics Semiconductor 2.448% 10/01/14	F	10/30/2009	Credit Suisse First Boston		28,175	30,134	
FP326D-82-9	CEMEX ESPANA FIN PRIVATE PLACEMENT 6.910% 02/14/14	R	09/01/2009	Tax Free Exchange		16,553,701	17,922,834	201,569
<b>3899999. Bonds - Industrial and Miscellaneous (Unaffiliated)</b>						<b>2,396,710,943</b>	<b>2,378,779,241</b>	<b>16,994,198</b>
02637X-AA-2	AMERICAN GENL INSTIT CAP NTS 144A SER B 8.125% 03/15/46		01/01/2009	BOLI-SA Star Bank 00-1		1,118,637	1,000,000	20,313
302570-AH-6	FPL GROUP CAPITAL 6.350% 10/01/66		01/01/2009	BOLI-SA Star Bank 00-1		506,975	500,000	6,526
<b>4899999. Bonds - Hybrid Securities</b>						<b>1,625,612</b>	<b>1,500,000</b>	<b>26,839</b>
<b>8399997. Total - Bonds - Part 3</b>						<b>2,989,885,281</b>	<b>2,950,037,137</b>	<b>18,329,915</b>
<b>8399998. Total - Bonds - Part 5</b>						<b>212,389,707</b>	<b>211,190,932</b>	<b>743,633</b>
<b>8399999. Total - Bonds</b>						<b>3,202,274,988</b>	<b>3,161,228,069</b>	<b>19,073,548</b>
283678-20-9	EL PASO ENERGY CAP TRST		09/14/2009	Various	7,600,000	215,267	0.00	
<b>8499999. Preferred Stocks - Industrial and Miscellaneous (Unaffiliated)</b>						<b>215,267</b>	<b>XXX</b>	
<b>8999997. Total - Preferred Stocks - Part 3</b>						<b>215,267</b>	<b>XXX</b>	
<b>8999998. Total - Preferred Stocks - Part 5</b>						<b>305,759</b>	<b>XXX</b>	
<b>8999999. Total - Preferred Stocks</b>						<b>521,026</b>	<b>XXX</b>	
017361-10-6	ALLEGHENY ENERGY INC		12/31/2009	Various	154,500,000	3,942,269		
053015-10-3	AUTOMATIC DATA PROCESSING		09/21/2009	Various	54,000,000	1,898,261		
093671-10-5	H & R BLOCK		12/07/2009	Various	16,600,000	338,217		
125581-80-1	CIT GROUP INC		12/10/2009	Taxable Exchange	170,477,000	4,746,656		
131347-30-4	CALPINE CORP COMMON		09/29/2009	Various	4,800,000	56,528		
134429-10-9	CAMPBELL SOUP CO		11/03/2009	Various	41,700,000	1,262,893		
16122M-10-0	CHARTER FINANCIAL CORP		10/28/2009	Various	10,300,000	107,768		
171798-10-1	CIMAREX ENERGY CO COMMON		03/16/2009	Various	20,500,000	458,594		
20030N-20-0	COMCAST CORP		11/04/2009	Various	103,000,000	1,485,264		
257701-20-1	DONEGAL GROUP INC-CL A COMMON		08/07/2009	Various	8,300,000	126,643		
263534-10-9	DUPONT (EI) DE NEMOURS		12/22/2009	Various	3,800,000	125,515		
28336L-10-9	EL PASO CORPORATION		09/11/2009	Various	24,500,000	231,124		
349631-10-1	FORTUNE BRANDS, INC.		12/16/2009	Various	11,400,000	343,557		
373200-30-2	GEORGIA GULF CORP		10/29/2009	Tax Free Exchange	31,537,000	154,377		
447011-10-7	HUNTSMAN CORP COMMON		03/10/2009	Direct Trading	8,300,000	22,530		
459506-10-1	INTL FLAVORS & FRAGRANCES		07/01/2009	Various	24,400,000	799,010		
521865-20-4	Lear Corp		11/18/2009	Tax Free Exchange	15,399,000	226,920		
540424-10-8	LOEWS CORP		10/14/2009	Various	53,200,000	1,381,066		

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

**SCHEDULE D - PART 3**

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

1	2	3	4	5	6	7	8	9
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends
565849-10-6	MARATHON OIL CORP		07/22/2009	Various	36,800.000	1,089,359		
582411-10-4	MCMORAN EXPLORATION CO COMMON		07/08/2009	Various	137,600.000	730,207		
587902-10-7	MERCER INSURANCE GROUP INC COMMON		05/05/2009	Various	14,600.000	205,950		
60467R-10-0	MIRANT CORP		12/07/2009	Various	7,000.000	105,981		
640079-10-9	NEENAH PAPER INC		05/06/2009	Various	61,500.000	320,038		
717081-10-3	PFIZER INC		12/08/2009	Various	20,800.000	381,940		
737464-10-7	POST PROPERTIES INC		12/18/2009	Various	5,200.000	85,756		
74973W-10-7	RTI INTERNATIONAL METALS INC		11/09/2009	Various	9,800.000	223,552		
798241-10-5	SAN JUAN BASIN ROYALTY TR		09/01/2009	Various	35,100.000	522,134		
803111-10-3	SARA LEE CORP		11/04/2009	Various	83,300.000	923,826		
855707-10-5	STATE AUTO FINANCIAL CORP		12/18/2009	Various	43,400.000	751,228		
868536-10-3	SUPERVALU INC		12/29/2009	Various	43,800.000	598,635		
879433-10-0	TELEPHONE AND DATA SYSTEMS, INC		12/22/2009	Various	25,300.000	832,246		
884453-10-1	THOMAS PROPERTIES GROUP		01/09/2009	Various	7,400.000	20,838		
890516-10-7	Tootsie Roll		10/14/2009	Various	29,400.000	698,008		
890516-10-7	Tootsie Roll		03/06/2009	Stock Dividend	3,159.000			
931422-10-9	WALGREEN CO		01/15/2009	Pershing/CJS Securities	500.000	13,371		
969490-10-1	CLAYTON WILLIAM COMMON		11/10/2009	Various	55,700.000	1,173,429		
984121-10-3	XEROX CORP		11/06/2009	Various	81,600.000	516,746		
067901-10-8	Barrick Gold Corp	A.	12/28/2009	Various	1,500.000	56,456		
257559-20-3	DOMTAR CORP	A.	12/29/2009	Various	40,100.000	1,386,444		
257559-20-3	DOMTAR CORP	A.	06/11/2009	Tax Free Exchange	51,502.000	2,695,855		
65334H-10-2	NEXEN INC COMMON	A.	11/25/2009	Various	59,500.000	865,215		
666416-10-2	Northgate Minerals Corp	A.	12/31/2009	Direct Trading	4,000.000	12,308		
68383K-10-9	OPTI CANADA INC COMMON	C.	01/06/2009	Nesbitt Burns Securities Inc.	10,000.000	17,034		
887147-13-0	TIMBERWEST FOREST CRP	C.	10/28/2009	Various	34,500.000	126,278		
887147-13-0	TIMBERWEST FOREST CRP	C.	05/11/2009	Tax Free Exchange	332,400.000	2,779,937		
887147-20-5	TIMBERWEST FOREST CRP	C.	01/01/2009	Direct Trading	(5,000.000)	(14,007)		
981442-10-6	WORLD COLOR PRESS INC	A.	09/03/2009	Tax Free Exchange	50,642.000	110,000		
38059T-10-6	GOLD FIELDS LTD	F.	10/21/2009	Various	134,200.000	1,796,163		
76026T-20-5	REPSOL SA SPONSORED ADR	R.	12/18/2009	Various	85,600.000	1,965,695		
60450A-10-5	Arch Capital Group Ltd	F.	12/18/2009	Various	23,000.000	1,514,106		
66052F-10-3	MAX CAPITAL GROUP LTD MAX CAPITAL GROUP LTD	F.	08/10/2009	Various	17,300.000	322,763		
67127P-10-0	PLATINUM UNDERWRITERS HLDGS PLATINUM UNDERWRITER HLDGS	F.	12/18/2009	Various	19,700.000	573,428		
H89128-10-4	TYCO International	R.	06/01/2009	Various	15,300.000	361,742		
H89128-10-4	TYCO International	R.	03/17/2009	Tax Free Exchange	24,900.000	925,625		
9099999	Common Stocks - Industrial and Miscellaneous (Unaffiliated)					42,395,478	XXX	
084670-20-7	BERKSHIRE HATHAWAY INC CLASS B		12/18/2009	Various	471.000	1,517,453		
000000-00-0	First Symetra National Life of NY		12/07/2009	Capital Contribution		20,000,000		
9199999	Common Stocks - Parent, Subsidiaries and Affiliates					21,517,453	XXX	
723682-10-0	Pioneer Fund A		12/31/2009	Pioneer	101.775	3,074		
724010-10-3	Pioneer Value Fund A		12/31/2009	Pioneer	34.164	328		
723750-10-8	Pioneer Mid Cap Value Fund A		12/31/2009	Pioneer	11.031	199		
72387W-40-8	Pioneer Growth Opportunities Fund A		12/31/2009	Pioneer	300.420	3,829		
72387P-72-6	Pioneer Government Income Fund A		12/31/2009	Pioneer	9.510	93		
9299999	Common Stocks - Mutual Funds					7,523	XXX	
723755-10-4	Pioneer Cash Reserves Fund A		12/31/2009	Pioneer	4.170	4		
9399999	Common Stocks - Money Market Mutual Funds					4	XXX	
9799997	Total - Common Stocks - Part 3					63,920,458	XXX	
9799998	Total - Common Stocks - Part 5					6,884,744	XXX	
9799999	Total - Common Stocks					70,805,202	XXX	
9899999	Total - Preferred and Common Stocks					71,326,228	XXX	
9999999	Totals					3,273,601,216	XXX	19,073,548

E13.7

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/Decrease	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Maturity Date
041792-9A-2	FHA PROJ LOAN #023-43254 (OAKNOLL)		12/01/2009	Paydown		97,612	97,635	98,612	98,475			(839)	(839)		97,635				2,989	06/01/2036
17309*-9Z-7	FHA PROJ SECT 236 #92 (CITICORP) 7.680%		12/01/17	Paydown		122,101	122,101	118,495	120,096		2,005		2,005		122,101				4,739	12/01/2017
17309*-9Z-7	FHA PROJ SECT 236 #92 (CITICORP) 7.680%		12/01/17	Paydown																
17309*-9Z-7	FHA PROJ SECT 236 #92 (CITICORP) 7.680%		12/01/17	City		1,524,819	1,548,726	1,502,996	1,523,293		1,527		1,527		1,524,819				117,623	12/01/2017
3128X2-K4-6	FHLB UNSEC'D BONDS SER BP18 5.400%		03/05/2009	Call	100.0000	5,000,000	5,000,000	5,012,500	5,000,501		(501)		(501)		5,000,000				130,000	03/05/2019
3133MU-SW-6	FHLB UNSEC'D BONDS SER BP18 5.400%		02/05/2009	Call	100.0000	100,000	100,000	101,000	100,000						100,000				3,075	01/10/2018
313455-9F-6	FHA 113 7.430% 06/01/24		12/01/2009	Paydown		6,681	6,681	6,201	6,366		314		314		6,681				272	06/01/2024
3134A3-ZJ-8	FHLB UNSEC'D DEBS (callable) 0.000%		09/14/29	Call	25.2085	50,416,978	200,000,000	32,250,000	49,245,097		2,399,494		2,399,494		51,644,591		(1,227,613)	(1,227,613)		09/14/2029
31359M-EY-5	FNMA 6.625% 09/15/09		09/15/2009	Maturity		1,650,000	1,650,000	1,619,449	1,647,142		2,858		2,858		1,650,000				109,313	09/15/2009
32399W-9Z-6	FHA PROJECT, CITICORP PL #152 7.430%		09/01/24	Paydown		9,144	9,144	9,697	9,472		(328)		(328)		9,144				375	09/01/2024
36184*-9A-2	FHA 221(D)4 PROJ LOAN GMAC #56 7.430%		11/01/22	Paydown		150,429	150,429	150,993	150,086		343		343		150,429				9,444	11/01/2022
36199T-9C-7	FHA PROJ GMAC # 195 SECT 221(D)4 7.430%		11/01/25	Direct		1	8,050	7,819	7,883											11/01/2025
36202C-QX-4	GNMA 11 POOL #2270 8.000% 08/20/26		12/01/2009	Paydown		2,196	2,196	2,218	2,215		(19)		(19)		2,196		(7,882)	(7,882)	105	08/20/2026
36203D-QC-7	GNMA POOL #346151 7.500% 04/15/23		12/01/2009	Paydown		61,444	61,444	63,297	63,161		(1,717)		(1,717)		61,444				2,639	04/15/2023
36203G-HA-4	GNMA POOL #348625 7.500% 04/15/23		12/01/2009	Paydown		20,247	20,247	20,814	20,756		(508)		(508)		20,247				1,223	04/15/2023
36203R-YD-5	GNMA POOL #357208 7.500% 05/15/23		12/01/2009	Paydown		9,059	9,059	9,375	9,245		(186)		(186)		9,059				362	05/15/2023
36204G-KR-2	GNMA POOL #369404 6.500% 02/15/24		12/01/2009	Paydown		8,591	8,591	7,418	7,514		1,077		1,077		8,591				373	02/15/2024
36215K-W6-3	GNMA POOL #137569 11.000% 10/15/15		12/01/2009	Paydown		1,916	1,916	1,875	1,895		21		21		1,916				116	10/15/2015
36223D-TP-1	GNMA #304858 PROJECT SEC 241(F) 8.250%		04/15/32	Paydown		1,155,875	1,155,875	1,191,274	1,182,169		(26,293)		(26,293)		1,155,875				71,188	04/15/2032
36224L-J7-3	GNMA POOL #331586 7.500% 04/15/23		12/01/2009	Paydown		6,835	6,835	7,027	6,945		(109)		(109)		6,835				285	04/15/2023
36224P-VF-2	GNMA POOL #334614 7.500% 05/15/23		12/01/2009	Paydown		17,504	17,504	17,996	17,833		(330)		(330)		17,504				719	05/15/2023
36224S-JA-1	GNMA POOL #336957 7.000% 05/15/23		12/01/2009	Paydown		6,539	6,539	6,626	6,614		(75)		(75)		6,539				262	05/15/2023
36295Q-KU-3	Government National Mortgage A POOL 677207 6.500% 08/15/38		12/01/2009	Paydown		294,605	294,605	304,410	304,357		(9,752)		(9,752)		294,605				8,853	08/15/2038
36296D-LC-0	Government National Mortgage A POOL 688023 6.000% 10/15/38		12/01/2009	Paydown		1,262,830	1,262,830	1,288,481	1,288,439		(25,609)		(25,609)		1,262,830				42,723	10/15/2038
36296D-LC-0	Government National Mortgage A POOL 688023 6.000% 10/15/38		12/30/2009	BOLI- SA Renasant Bank		470,683	461,502	470,876	470,860		(177)		(177)		470,683				29,921	10/15/2038
36296F-MQ-3	Government National Mortgage A POOL 689867 6.500% 09/15/38		12/01/2009	Paydown		2,908,278	2,908,278	3,006,432	3,005,899		(97,622)		(97,622)		2,908,278				88,626	09/15/2038
36296N-W7-7	Government National Mortgage A POOL 696470 6.500% 08/15/38		12/01/2009	Paydown		565,726	565,726	584,554	584,453		(18,727)		(18,727)		565,726				16,331	08/15/2038
362995-BA-9	FHA PROJ 236 #071-44173 SALEM 8.930%		07/01/19	Paydown		130,128	130,128	126,683	127,952		2,176		2,176		130,128				6,380	07/01/2019
370424-A#-0	FHA (GMAC) PROJ #110 PUTABLE (GMAC) 6.620% 04/01/14		12/01/2009	Paydown		137,777	137,777	75,949	115,624		22,153		22,153		137,777				5,045	04/01/2014
37099Q-9X-6	FHA PROJ SECT 236 GMAC #2-236-2 8.090%		11/01/14	Paydown		248,527	248,527	229,695	241,133		7,394		7,394		248,527				10,989	11/01/2014
380992-GM-3	FHA 221(D)4 PROJ LOAN GMAC #12 7.430%		06/20/21	Paydown		118,745	118,745	119,093	118,823		(78)		(78)		118,745				5,759	06/20/2021
619999-AA-3	FHA 241(F) #052-12012L(MOSSHILL) 8.200%		06/01/33	Paydown		21,961	21,961	22,071	22,030		(69)		(69)		21,961				912	06/01/2033
619999-AA-3	FHA 241(F) #052-12012L(MOSSHILL) 8.200%		06/01/33	Paydown		2,203,916	2,197,854	2,208,844	2,204,721		(805)		(805)		2,203,916				171,213	06/01/2033
664355-9I-6	FHA PROJ PL# 85-1 NON-PUTABLE 8.548%		12/25/20	Paydown		19,635	19,635	19,296	18,616		1,019		1,019		19,635				2,346	12/25/20
912827-5N-8	U S TREASURY NOTES 6.000% 08/15/09		08/15/2009	Various		1,060,000	1,060,000	1,127,658	1,066,048		(6,048)		(6,048)		1,060,000				63,600	08/15/2009
917991-8U-8	FHA PROJ #132 NON-PUTABLE (USG1) 7.430%		12/01/23	Paydown		20,800	20,800	11,694	14,482		6,318		6,318		20,800				847	12/01/2023

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
917991-8Y-0	FHA SECT 236 USGI PC #2055 8.930% 10/01/19		12/01/2009	Paydown		20,846	20,846	19,527	20,090						20,846				1,022	10/01/2019
0399999	<b>Bonds - U.S. Governments</b>					69,852,428	219,452,186	51,820,945	68,830,285		2,257,662		2,257,662		71,087,946		(1,235,495)	(1,235,495)	909,669	XXX
465139-DV-2	STATE OF ISRAEL-AID GTD SF BONDS 6.800% 02/15/12	F	08/15/2009	Redemption 100.0000		2,331,778	2,331,778	2,247,934	2,308,649		2,532		2,532		2,311,182		20,596	20,596	119,583	02/15/2012
1099999	<b>Bonds - All Other Governments</b>					2,331,778	2,331,778	2,247,934	2,308,649		2,532		2,532		2,311,182		20,596	20,596	119,583	XXX
156809-BV-6	CERRITOS CALIF PUB FING AUTH R TAXABLE LOS COYOTES SER B 7.750% 11/01/13		11/01/2009	Redemption 100.0000		110,000	110,000	129,789	121,038		(1,702)		(1,702)		119,336		(9,336)	(9,336)	8,525	11/01/2013
40727P-AJ-1	HAMILTON CNTY OHIO GAS SUPPLY TAXABLE 7.370% 08/01/09		08/01/2009	Maturity		1,000,000	1,000,000	1,191,040	1,020,238		(20,238)		(20,238)		1,000,000				73,700	08/01/2009
544389-X7-9	LOS ANGELES CALIF CMNTY REDEV TAXABLE TAX ALLOC SER E 4.500% 07/01/09		07/01/2009	Maturity		955,000	955,000	955,907	955,093		(93)		(93)		955,000				42,975	07/01/2009
2499999	<b>Bonds - U.S. Political Subdivisions of States, Territories and Possessions</b>					2,065,000	2,065,000	2,276,736	2,096,369		(22,033)		(22,033)		2,074,336		(9,336)	(9,336)	125,200	XXX
29270C-FL-4	ENERGY NORTHWEST REF TAXABLE PROJ NO 1 SER B 4.060% 07/01/09		07/01/2009	Maturity		3,000,000	3,000,000	3,000,000	3,000,000						3,000,000				121,800	07/01/2009
31288E-Y3-5	FHLMC POOL #C76130 5.000% 02/01/33		12/01/2009	Paydown		477,519	477,519	474,534	474,744		2,775		2,775		477,519				15,651	02/01/2033
31288G-Q2-1	FHLMC POOL #C77673 5.000% 03/01/33		12/01/2009	Paydown		624,868	624,868	620,962	621,182		3,685		3,685		624,868				17,795	03/01/2033
31288G-S5-2	FHLMC POOL #C77740 5.000% 03/01/33		12/01/2009	Paydown		181,394	181,394	180,260	180,373		1,021		1,021		181,394				5,225	03/01/2033
31288H-EB-9	FHLMC POOL #406430 (ARM) 3.250% 03/01/22		12/01/2009	Paydown		2,770	2,770	2,759	2,756		14		14		2,770				64	03/01/2022
312906-J5-0	FHLMC REMIC SER 198-Z 8.500% 09/15/22 FHLMC REMIC SER 1526-L (B-PAC) 6.500%		12/15/2009	Paydown		121,921	121,921	107,573	112,828		9,093		9,093		121,921				4,712	09/15/2022
312916-FL-8	FHLMC REMIC SER 1562 Z (ACRL) 7.000%		12/01/2009	Paydown		446,205	446,205	404,931	428,179		18,027		18,027		446,205				14,888	06/15/2023
312916-ZY-8	FHLMC REMIC SER 1562 Z (ACRL) 7.000%		12/01/2009	Paydown		637,306	637,306	601,398	616,904		20,403		20,403		637,306				25,330	07/15/2023
312926-L8-7	FHLMC POOL #00351 8.000% 07/01/24		12/01/2009	Paydown		8,474	8,474	8,410	8,416		58		58		8,474				441	07/01/2024
31296L-PK-1	FHLMC POOL #A12226 5.000% 08/01/33 FHLMC REMIC SER 2392 PV (B-PAC) 6.000%		12/01/2009	Paydown		316,490	316,490	313,294	313,611		2,879		2,879		316,490				7,318	08/01/2033
31339L-HC-7	FHLMC REMIC SER 2395 VB (VADM) 6.000%		06/01/2009	Paydown		277,119	277,119	276,513	276,475		644		644		277,119				5,297	12/15/2020
31339L-IN-7	FHLMC REMIC SER 2395 VB (VADM) 6.000% BOLI - SA Renasant Bank		12/30/2009	Paydown		1,705,153	1,727,000	1,645,507	1,686,519		18,634		18,634		1,705,153				111,967	05/15/2019
31339L-MQ-0	FHLMC REMIC SER 2395 VA (VADM) 6.000%		12/01/2009	Paydown		206,108	206,108	221,147	212,672		(6,564)		(6,564)		206,108				6,760	02/15/2011
31339L-XI-5	FHLMC REMIC SER 2391 VQ (VADM) 6.000%		10/15/12	Paydown		25,767	25,767	27,164	26,321		(555)		(555)		25,767				845	04/15/2011
31339N-TZ-9	FHLMC REMIC SER 2428 ED (B-PAC) 6.000%		12/01/2009	Paydown		2,138	2,138	2,130	2,132		6		6		2,138				69	03/15/2017
313370-J7-0	FHLMC REMIC SER 1578 K (B-PAC) 6.900%		12/01/2009	Paydown		159,215	159,215	151,516	155,518		3,697		3,697		159,215				6,311	09/15/2023
313370-VX-9	FHLMC REMIC SER 1560 Z (PAC Z) 7.000%		12/01/2009	Paydown		3,457,099	3,457,099	3,169,006	3,279,097		178,002		178,002		3,457,099				131,660	08/15/2023
313370-Y6-5	FHLMC REMIC SER 1572 ZZ 7.000% 09/15/23 FHLMC REMIC SER 1629 K (B-PAC) 6.000%		12/01/2009	Call 99.2399		672,000	677,147	635,013	653,437		(1,309)		(1,309)		652,127		19,873	19,873	287,318	09/15/2023
313372-A8-3	FHLMC REMIC SER 1676 KZ (PAC Z) 6.500%		04/01/2009	Paydown		6,251	6,251	6,593	6,247		4		4		6,251				78	03/15/2009
313373-3F-3	FHLMC REMIC SER 1685 J (SEQ) 6.000%		12/01/2009	Paydown		2,072,452	2,072,452	1,894,203	1,965,567		106,885		106,885		2,072,452				72,467	02/15/2024
313374-DK-9	FHLMC REMIC SER 1731 H (SEQ) 6.250%		12/01/2009	Paydown		741,294	741,294	620,833	680,576		60,717		60,717		741,294				34,122	02/15/2024
313375-MS-9	FHLMC REMIC SER 1755 N (SEQ) 6.000%		12/01/2009	Paydown		698,007	698,007	550,553	641,780		56,227		56,227		698,007				28,116	05/15/2024
313375-N7-4	FHLMC REMIC SER 1806 D (SEQ) 6.500%		12/01/2009	Paydown		1,268,141	1,268,141	928,913	1,114,975		153,165		153,165		1,268,141				38,893	10/15/2024
313376-QN-4	FHLMC REMIC SER 1811 G (SEQ) 6.500%		12/01/2009	Paydown		268,209	268,209	249,434	256,609		11,600		11,600		268,209				7,911	12/15/2025
313376-SH-5	FHLMC REMIC SER 1843 Z (SEQ Z) 7.000%		12/01/2009	Paydown		285,213	285,213	266,853	274,050		11,163		11,163		285,213				15,334	01/15/2026
313376-T7-6	FHLMC REMIC SER 1843 Z (SEQ Z) 7.000%		12/01/2009	Paydown		572,242	572,242	497,758	529,650		42,591		42,591		572,242				24,792	04/15/2026



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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
31337-PN-3	FHLMC REMIC SER 1871 Z 7.000% 08/15/26		12/01/2009	Paydown		101,298	101,298	91,781	95,242		6,056		6,056		101,298				4,034	08/15/2026
313378-LK-1	FHLMC REMIC SER 1910 ZU (ACRL) 8.000%		12/01/2009	Paydown		601,443	601,443	617,547	611,564		(10,121)		(10,121)		601,443				25,300	11/15/2026
313378-XJ-1	FHLMC REMIC SER 1941 E (SEQ) 7.500%		12/01/2009	Paydown		76,258	76,258	74,101	74,821		1,437		1,437		76,258				2,970	02/15/2027
31337B-WG-1	FHLMC REMIC SER 1995 PD (B-PAC) 6.500%		12/01/2009	Paydown		319,464	319,464	298,050	306,486		12,978		12,978		319,464				10,958	10/20/2027
31337G-E9-6	FHLMC REMIC SER 2086 GB (SEQ) 6.000%		12/01/2009	Paydown		507,776	507,776	473,106	486,862		20,914		20,914		507,776				18,090	09/15/2028
31337G-U4-9	FHLMC REMIC SER 2091 ZC (B-PAC-ACRL) 6.000%		12/01/2009	Paydown		806,726	806,726	818,615	817,020		(10,294)		(10,294)		806,726				24,373	11/15/2028
31337K-G7-9	FHLMC REMIC SER 2141 E (SEQ) 6.600%		12/01/2009	Paydown		163,420	163,420	152,619	154,427		8,993		8,993		163,420				5,880	04/15/2029
31337P-QW-2	FHLMC REMIC SER 2252 PE (B-PAC) 7.500%		12/01/2009	Paydown		249,772	249,772	249,304	249,230		542		542		249,772				9,007	08/15/2030
31337T-TT-8	FHLMC REMIC SER 2330 PZ (PAC-Z) 6.500%		12/01/2009	Paydown		3,495,788	3,495,788	3,255,081	3,345,644		150,145		150,145		3,495,788				115,504	06/15/2031
31343L-W7-5	FHLMC POOL #279670 10.000% 09/01/15		06/01/2009	Paydown		1,614	1,614	1,604	1,600		14		14		1,614				56	09/01/2015
31358J-BJ-9	FNMA REMIC SER 1991-119 Z (ACRL) 8.500%		12/01/2009	Paydown		184,290	184,290	165,645	171,265		13,025		13,025		184,290				9,205	09/25/2021
31358J-KC-4	FNMA /GNMA SER G-27 JQ (B PAC) 8.500%		12/01/2009	Paydown		97,086	97,086	95,376	96,126		960		960		97,086				4,588	07/25/2018
31358P-HT-7	FNMA /GNMA SER G92-35 E (B PAC) 7.500%		12/01/2009	Paydown		134,406	134,406	137,123	135,152		(746)		(746)		134,406				5,502	07/25/2022
31358U-2K-1	FNMA REMIC SER 1993 50-PZ (PAC Z) 7.000%		12/01/2009	Paydown		2,223,047	2,223,047	2,096,308	2,146,201		76,846		76,846		2,223,047				78,291	05/25/2023
31358U-7D-2	FNMA REMIC SER 1993-70 Z 6.900% 05/25/23		12/01/2009	Paydown		509,696	509,696	462,246	482,211		27,486		27,486		509,696				19,728	05/25/2023
31358U-MV-5	FNMA /GNMA SER 1993 15-H (B-PAC) 7.250%		12/01/2009	Paydown		530,277	530,277	527,043	527,447		2,830		2,830		530,277				21,299	04/25/2023
31359A-2P-3	FNMA REMIC SER 1993 104-E (SEQ) 6.500%		12/01/2009	Paydown		264,320	264,320	240,160	254,127		10,193		10,193		264,320				9,633	07/25/2023
31359A-KE-8	FNMA REMIC SER 1993-65 ZZ (ACRL) 7.000%		03/01/2009	Call	100.0000	(8,422)	(8,422)	(8,156)	(8,319)						(8,319)		(102)	(102)	(49)	06/25/2013
31359A-UG-2	FNMA REMIC SER 1993-96 PZ (PAC Z) 7.000%		12/01/2009	Paydown		211,177	211,177	203,026	205,802		5,375		5,375		211,177				7,172	06/25/2023
31359B-P4-3	FNMA REMIC SER 1993 133-KZ (B-PAC) 7.000% 08/25/23		12/01/2009	Paydown		1,815,914	1,815,914	1,761,222	1,779,491		36,423		36,423		1,815,914				71,821	08/25/2023
31359B-TX-5	FNMA REMIC SER 1993-127 H (BPAC) 6.500%		12/01/2009	Paydown		106,525	106,525	97,621	101,489		5,037		5,037		106,525				3,788	07/25/2023
31359D-3U-5	FNMA REMIC SER 1993-163 ZA 7.000%		12/01/2009	Paydown		232,127	232,127	223,242	226,362		5,765		5,765		232,127				8,701	09/25/2023
31359D-JT-1	FNMA REMIC SER 1993-156 ZB (Z) 7.000%		12/01/2009	Paydown		1,244,507	1,244,507	1,191,172	1,210,258		34,248		34,248		1,244,507				46,160	09/25/2023
31359F-TF-5	FNMA REMIC SER 1993-223 PZ (PAC Z) 6.500% 12/25/23		12/01/2009	Paydown		134,800	134,800	125,769	128,569		6,231		6,231		134,800				8,406	12/25/2023
31359H-SB-1	FNMA REMIC SER 1994-72 J (B-PAC) 6.000%		08/01/2009	Paydown		460,055	460,055	461,205	458,388		1,667		1,667		460,055				11,427	08/25/2010
31359K-PQ-4	FNMA REMIC SER 1996-32 PJ (B-PAC) 7.000% 08/25/26		12/01/2009	Paydown		304,347	304,347	298,640	300,884		3,463		3,463		304,347				11,956	08/25/2026
31359K-QX-8	FNMA REMIC SER 1996-114 C (COMM-ACES) 7.750% 08/17/35		12/01/2009	Paydown		276,228	276,228	294,873	292,567		(16,339)		(16,339)		276,228				19,135	05/17/2035
31359L-KA-2	FNMA REMIC /GNMA SER G94-13 ZA (Z,PAC) 7.000% 11/17/24		12/01/2009	Paydown		2,447,733	2,447,733	2,114,345	2,249,872		197,862		197,862		2,447,733				97,487	11/17/2024
31359X-UII-7	FNMA REMIC SER 2000-M1 Z (ACES-ADJ) 7.208% 01/17/40		12/01/2009	Paydown		11,806,895	11,806,895	11,308,327	11,286,330		520,565		520,565		11,806,895				469,906	01/17/2040
313602-EG-5	FNMA REMIC SER 1988 17-C (B.PAC) 10.000%		12/01/2009	Paydown		9,633	9,633	9,728	9,638		(4)		(4)		9,633				606	03/25/2018
31360A-KH-8	FNMA POOL #296 13.250% 09/01/11		12/01/2009	Paydown		3,319	3,319	3,252	3,280		39		39		3,319				240	09/01/2011

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
31362N-YL-4	FNMA POOL #66415 (ARM) 5.066% 07/01/17		12/01/2009	Paydown		19,150	19,150	18,941	19,020			130	130		19,150				.540	07/01/2017
31362W-2T-2	FNMA DUS POOL #73686 (30/19) 7.960%		12/01/2009	Paydown		103,905	103,905	107,801	105,403		(1,498)		(1,498)		103,905				4,540	10/01/2026
31362W-3B-0	FNMA DUS POOL #73694 (30/15) 8.060%		12/01/2009	Paydown		65,613	65,613	66,843	66,398		(785)		(785)		65,613				2,902	10/01/2026
31362W-3B-0	FNMA DUS POOL #73694 (30/15) 8.060%		12/30/2009	BOLI- SA Renasant Bank		600,492	593,814	604,948	600,918		(426)		(426)		600,492				51,717	10/01/2026
31362W-EZ-5	FNMA DUS POOL #73052 (30/20) 8.950%		12/01/2009	Paydown		11,632,952	11,632,952	11,821,988	11,739,569		(106,617)		(106,617)		11,632,952				1,032,879	12/01/2024
31362W-FN-1	FNMA DUS POOL #73073 (M/F) (25/15) 8.900% 02/01/20		12/01/2009	Paydown		201,528	201,528	219,224	210,834		(9,306)		(9,306)		201,528				9,857	02/01/2020
31362W-TC-0	FNMA DUS POOL #73447 (30/30/20) 7.400%		12/01/2009	Paydown		123,731	123,731	131,580	129,222		(5,491)		(5,491)		123,731				5,024	05/01/2026
31362W-TC-0	FNMA DUS POOL #73447 (30/30/20) 7.400%		12/30/2009	BOLI- SA Renasant Bank		732,848	703,223	747,833	734,430		(1,582)		(1,582)		732,848				56,230	05/01/2026
31362W-VL-7	FNMA DUS POOL #73519 (20/20/15) 7.600%		12/01/2009	Paydown		452,684	452,684	521,860	494,661		(41,977)		(41,977)		452,684				18,878	07/01/2016
31362W-WM-4	FNMA DUS POOL #73552 (30/20) 7.950%		12/01/2009	Paydown		85,279	85,279	86,958	86,335		(1,056)		(1,056)		85,279				3,721	07/01/2026
31362W-XC-5	FNMA DUS POOL #73575 (25/25/15) 7.990%		11/01/2009	Paydown		1,811,327	1,811,327	1,843,592	1,827,309		(15,982)		(15,982)		1,811,327				360,695	08/01/2021
31362W-XQ-4	FNMA DUS POOL #73587 (30/20) 7.865%		12/01/2009	Paydown		41,989	41,989	42,085	42,000		(12)		(12)		41,989				1,813	07/01/2026
31362X-CA-0	FNMA DUS POOL #73865 (30/18/15) 7.000%		12/01/2009	Paydown		52,715	52,715	55,977	54,222		(1,507)		(1,507)		52,715				2,024	01/01/2015
31362X-DB-7	FNMA DUS POOL #73898 (30/18/15) 6.965%		12/01/2009	Paydown		68,050	68,050	70,750	68,965		(915)		(915)		68,050				2,599	01/01/2015
31362X-DC-5	FNMA DUS POOL #73899 (30/18/15) 6.965%		12/01/2009	Paydown		91,092	91,092	94,508	92,236		(1,145)		(1,145)		91,092				3,479	01/01/2015
313637-CF-5	FNMA DUS POOL #109070 (25/18/17.5) 6.640%		12/01/2009	Paydown		96,769	96,769	99,914	97,971		(1,202)		(1,202)		96,769				3,521	02/01/2016
313637-E8-9	FNMA DUS POOL #109159 (30/18/17.5) 6.720%		12/01/2009	Paydown		57,470	57,470	59,410	58,199		(729)		(729)		57,470				2,117	11/01/2015
313637-EV-8	FNMA DUS POOL #109148 (30/18/17.5) 7.000%		12/01/2009	Paydown		1,854	1,854	1,913	1,875		(21)		(21)		1,854				.71	12/01/2015
31364H-FQ-5	FNMA STRIP SER 56-1 (SEQ) 6.000%		12/01/2009	Paydown		456	456	341	390		66		66		456				.15	04/01/2019
31371N-MG-7	FNMA POOL #256959 6.000% 11/01/37		12/01/2009	Paydown		4,445,089	4,445,089	4,486,762	4,485,810		(40,721)		(40,721)		4,445,089				125,451	11/01/2037
31377E-UE-7	FNMA DUS POOL #375081 (30/18/15) 7.500%		12/01/2009	Paydown		83,725	83,725	89,822	86,580		(2,855)		(2,855)		83,725				3,446	04/01/2015
31377E-V2-2	FNMA DUS POOL #375133 (30/30/15) 7.790%		12/01/2009	Paydown		49,352	49,352	50,416	50,060		(708)		(708)		49,352				2,110	05/01/2027
31377E-X6-1	FNMA DUS POOL #375201 (30/18/15) 7.435%		12/01/2009	Paydown		72,440	72,440	78,235	74,697		(2,257)		(2,257)		72,440				2,955	06/01/2015
31377F-DA-1	FNMA DUS POOL #375497 (30/18/15) 6.920%		12/01/2009	Paydown		40,802	40,802	42,995	41,648		(846)		(846)		40,802				1,550	11/01/2015
31377F-GU-4	FNMA DUS POOL #375611 (30/30/15) 7.000%		12/01/2009	Paydown		74,443	74,443	76,001	75,496		(1,053)		(1,053)		74,443				2,856	01/01/2028
31377F-GU-4	FNMA DUS POOL #375611 (30/30/15) 7.000%		12/30/2009	BOLI- SA Renasant Bank		705,725	696,392	710,973	706,245		(521)		(521)		705,725				52,674	01/01/2028
31377L-EF-6	FNMA DUS POOL #380034 (30/30/15) 6.840%		12/01/2009	Paydown		29,073	29,073	29,295	29,201		(128)		(128)		29,073				1,090	01/01/2028
31377L-HC-0	FNMA DUS POOL #380127 (30/17/15) 7.910%		12/01/2009	Paydown		11,036	11,036	12,223	11,526		(490)		(490)		11,036				.479	07/01/2015
31377L-HE-6	FNMA DUS POOL #380129 (30/17/15) 7.910%		12/01/2009	Paydown		929	929	1,029	970		(41)		(41)		929				.40	07/01/2015
31377L-SE-4	FNMA DUS POOL #380417 (25/25/20) 6.470%		12/01/2009	Paydown		239,519	239,519	242,213	240,943		(1,424)		(1,424)		239,519				8,481	07/01/2023

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/Decrease	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Maturity Date
31377M-3P-4	FNMA DUS POOL #381606 (30/17/15) 7.400% 10/01/15		12/01/2009	Paydown		27,258	27,258	28,808	27,906		(649)		(649)		27,258				1,106	10/01/2015
31377M-E2-3	FNMA DUS POOL #380953 (13.5/13.5/13) 6.800% 02/01/12		12/01/2009	Paydown		49,958	49,958	52,636	50,494		(536)		(536)		49,958				1,862	02/01/2012
31377M-E4-9	FNMA DUS POOL #380955 (13.5/13.5/13) 6.580% 03/01/12		12/01/2009	Paydown		55,251	55,251	57,305	55,626		(375)		(375)		55,251				1,992	03/01/2012
31377M-KS-9	FNMA DUS POOL #381105 (30/17.5/15) 7.160% 04/01/16		12/01/2009	Paydown		16,522	16,522	17,570	16,973		(451)		(451)		16,522				649	04/01/2016
31377M-NC-1	FNMA DUS POOL #381187 (30/30/15) 6.430% 01/01/29		12/01/2009	Paydown		26,381	26,381	28,388	27,994		(1,613)		(1,613)		26,381				929	01/01/2029
31377M-NC-1	FNMA DUS POOL #381187 (30/30/15) 6.430% 01/01/29		12/30/2009	BOLI- SA Renasant Bank		275,524	260,291	280,097	276,205		(681)		(681)		275,524				18,085	01/01/2029
31377N-4G-1	FNMA DUS POOL #382523 (16/16/10) 7.770% 06/01/16		12/01/2009	Paydown		262,202	262,202	266,749	262,228		(26)		(26)		262,202				11,180	06/01/2016
31377N-CW-7	FNMA DUS POOL #381785 (30/15.5/15) 7.180% 01/01/15		12/01/2009	Paydown		29,208	29,208	29,829	29,401		(193)		(193)		29,208				1,159	01/01/2015
31377P-R2-2	FNMA DUS POOL #383105 (30/10/9.5) 6.200% 01/01/11		12/01/2009	Paydown		128,338	128,338	144,461	132,887		(4,549)		(4,549)		128,338				4,708	01/01/2011
31377Q-F9-8	FNMA DUS POOL #383692 (30/10/9.5) 6.440% 05/01/11		12/01/2009	Paydown		7,252	7,252	8,163	7,539		(287)		(287)		7,252				258	05/01/2011
31377Q-KZ-4	FNMA DUS POOL #383812 (30/10/9.5) 6.480% 07/01/11		05/01/2009	Paydown		689,640	689,640	778,000	718,873		(29,233)		(29,233)		689,640				79,152	07/01/2011
31377Q-VG-4	FNMA DUS POOL #384115 (10/10/9.5) 6.290% 10/01/11		12/01/2009	Paydown		5,076	5,076	5,583	5,249		(174)		(174)		5,076				175	10/01/2011
31377R-FU-9	FNMA DUS POOL #384579 (25/10/8) 5.730% 12/01/11		12/01/2009	Paydown		8,022	8,022	8,749	8,288		(266)		(266)		8,022				251	12/01/2011
31377R-UP-3	FNMA DUS POOL #384990 (30/18/15) 6.570% 04/01/20		12/01/2009	Paydown		44,102	44,102	48,071	46,733		(2,631)		(2,631)		44,102				1,588	04/01/2020
31377R-UP-3	FNMA DUS POOL #384990 (30/18/15) 6.570% 04/01/20		12/30/2009	BOLI- SA Renasant Bank		642,709	609,495	664,349	645,855		(3,146)		(3,146)		642,709				43,270	04/01/2020
31377S-AA-0	FNMA DUS POOL #385327 (30/15/14.5) 6.160% 08/01/17		12/01/2009	Paydown		15,398	15,398	16,284	15,912		(514)		(514)		15,398				519	08/01/2017
31377S-D8-8	FNMA DUS POOL #385427 (30/13.6/13) 5.760% 03/01/16		12/01/2009	Paydown		56,126	56,126	57,074	56,568		(442)		(442)		56,126				1,769	03/01/2016
31377S-UL-0	FNMA DUS POOL #385887 (30/18/15) 5.330% 01/01/21		12/01/2009	Paydown		10,276	10,276	11,156	10,890		(614)		(614)		10,276				299	01/01/2021
31377S-VH-8	FNMA DUS POOL #385916 (30/18/15) 5.370% 03/01/21		12/01/2009	Paydown		44,157	44,157	44,820	44,584		(426)		(426)		44,157				1,297	03/01/2021
31377T-AB-2	FNMA DUS POOL #386202 (30/15/14.5) 5.480% 05/01/18		12/01/2009	Paydown		10,919	10,919	12,294	11,789		(870)		(870)		10,919				330	05/01/2018
31377T-B5-4	FNMA DUS POOL #386260 (30/18/15) 4.700% 06/01/21		12/01/2009	Paydown		26,748	26,748	27,421	27,210		(462)		(462)		26,748				687	06/01/2021
31377T-RF-5	FNMA DUS POOL #386686 (30/18/15) 5.520% 12/01/21		12/01/2009	Paydown		28,165	28,165	29,186	28,910		(745)		(745)		28,165				850	12/01/2021
31377T-RG-3	FNMA DUS POOL #386687 (30/18/15) 5.600% 12/01/21		12/01/2009	Paydown		20,479	20,479	21,375	21,135		(656)		(656)		20,479				627	12/01/2021
31377T-RH-1	FNMA DUS POOL #386688 (30/18/15) 5.600% 12/01/21		12/01/2009	Paydown		26,801	26,801	27,973	27,659		(858)		(858)		26,801				821	12/01/2021
31377T-SZ-0	FNMA DUS POOL #386736 (30/30/20) 5.480% 01/01/34		12/01/2009	Paydown		65,549	65,549	65,979	65,897		(349)		(349)		65,549				1,981	01/01/2034
31377T-VU-7	FNMA DUS POOL #386827 (30/18/15) 5.230% 02/01/22		12/01/2009	Paydown		45,999	45,999	46,114	46,048		(50)		(50)		45,999				1,327	02/01/2022
31381G-MK-1	FNMA DUS PL #460362 (40/15.5/15.25) 6.631% 09/01/15		12/01/2009	Paydown		27,535	27,535	28,277	27,859		(323)		(323)		27,535				1,001	09/01/2015
31381G-MK-1	FNMA DUS PL #460362 (40/15.5/15.25) 6.631% 09/01/15		12/30/2009	BOLI- SA Renasant Bank		898,328	889,875	913,850	900,323		(1,995)		(1,995)		898,328				64,581	09/01/2015
31381G-U9-7	FNMA DUS POOL #460608 (30/20/19.5) 6.150% 03/01/22		12/01/2009	Paydown		153,559	153,559	165,460	161,914		(8,355)		(8,355)		153,559				5,169	03/01/2022

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
31392E-3V-0	FNMA REMIC SER 2002-71 PZ (PAC-Z) 5.500%		12/30/2009	BOLI- SA Renasant Bank		602,759	638,224	589,436	589,368		13,391		13,391		602,759				37,930	11/25/2032
31392F-3U-9	FNMA REMIC SER 2002-77 VA (VADM) 5.500%		12/01/2009	Paydown		1,833,080	1,833,080	1,913,564	1,868,229		(35,149)		(35,149)		1,833,080				55,068	11/25/2010
31392V-VU-3	FHLMC REMIC SER 2495 VA (VADM) 6.000%		06/01/2009	Paydown		7,632,390	7,632,390	8,166,657	7,696,638		(64,248)		(64,248)		7,632,390				136,049	06/15/2009
31392X-3X-4	FHLMC REMIC SER 2517 PV (VADM) 6.000%		06/15/2009	Paydown		2,642,780	2,642,780	2,839,337	2,662,565		(19,785)		(19,785)		2,642,780				40,795	10/15/2009
31392X-5U-8	FHLMC REMIC SER 2517 VP (VADM) 6.000%		06/15/2009	Paydown		3,676,888	3,676,888	3,950,356	3,702,987		(26,099)		(26,099)		3,676,888				62,243	05/15/2009
31393A-CP-0	FNMA REMIC SER 2003-29 QD (BPAC) 5.000%		10/25/15	Paydown		1,488,346	1,488,346	1,551,468	1,495,471		(7,125)		(7,125)		1,488,346				40,981	05/25/2010
31393A-PB-7	FNMA REMIC SER 2003-22 KJ (SEQ-NAS) 5.500%		04/25/33	Paydown		4,543,054	4,543,054	4,742,610	4,596,651		(53,597)		(53,597)		4,543,054				134,516	07/25/2010
31393C-5M-1	FNMA REMIC SER 2003-66 MZ (PAC Z) 5.000%		07/25/23	BOLI- SA Renasant Bank		544,085	589,469	534,351	537,483		6,602		6,602		544,085				31,848	07/25/2023
31393C-AH-6	FNMA REMIC SER 2003-34 AV (VADM) 6.000%		04/25/17	Paydown		998,167	998,167	1,072,413	1,045,837		(47,670)		(47,670)		998,167				32,737	03/25/2013
31393C-JM-6	FNMA REMIC SER 2003-54 PD (PAC) 4.500%		02/25/28	Paydown		3,950,559	3,950,559	3,944,386	3,939,739		10,820		10,820		3,950,559				84,124	02/25/2028
31393E-6H-7	FNMA REMIC SER 2003-W14 1A8 (WH-SEQ) 5.858%		09/25/43	Paydown		547,895	547,895	547,724	547,061		835		835		547,895				17,368	09/25/2043
31393E-6H-7	FNMA REMIC SER 2003-W14 1A8 (WH-SEQ) 5.858%		09/25/43	BOLI- SA Renasant Bank		930,432	931,978	931,687	930,558		(126)		(126)		930,432				58,993	09/25/2043
31393E-B2-4	FNMA REMIC 2003-93 MK (DUS 30/10/9.5) 7.500%		11/25/19	Paydown		198,848	198,848	214,693	209,755		(10,907)		(10,907)		198,848				8,193	11/25/2019
31393E-B2-4	FNMA REMIC 2003-93 MK (DUS 30/10/9.5) 7.500%		11/25/19	BOLI- SA Renasant Bank		821,767	782,711	845,083	825,643		(3,876)		(3,876)		821,767				63,432	11/25/2019
31393E-IJ-5	FNMA REMIC SER 2003-84 PZ (PAC Z) 5.000%		09/25/33	Various		61,367	70,521	61,257	61,801		(434)		(434)		61,367				20	
31393L-PN-7	FHLMC REMIC SER 2564 VH (PAC) 5.500%		01/15/14	Paydown		838,393	838,393	896,819	870,405		(32,012)		(32,012)		838,393				25,186	10/15/2013
31393M-PD-7	FHLMC REMIC SER 2582 TD (BPAC) 5.000%		01/15/28	Paydown		6,604,035	6,604,035	6,767,072	6,635,365		(31,330)		(31,330)		6,604,035				225,776	01/15/2010
31393M-PD-7	FHLMC REMIC SER 2582 TD (BPAC) 5.000%		01/15/28	BOLI-SA PNC/National City		337,589	338,100	346,447	339,704		(2,116)		(2,116)		337,589				16,717	01/15/2010
31393Q-C2-6	FHLMC REMIC SER 2612 LM (BPAC) 5.000%		08/15/28	Paydown		3,083,836	3,083,836	3,196,987	3,119,918		(36,082)		(36,082)		3,083,836				154,192	10/15/2010
31393Q-DY-5	FHLMC REMIC SER 2615 PD (BPAC) 5.500%		01/15/32	BOLI- SA Renasant Bank		1,147,716	1,136,000	1,168,660	1,156,662		(8,945)		(8,945)		1,147,716				67,513	02/15/2015
31393R-2K-5	FHLMC REMIC SER 2620 C (PAC) 4.500%		04/15/26	Paydown		7,120,926	7,120,926	7,310,076	7,131,600		(10,673)		(10,673)		7,120,926				119,273	08/15/2009
31393R-K7-4	FHLMC REMIC SER 2625 PX (PAC) 4.000%		10/15/26	Paydown		10,299,829	10,299,829	10,542,438	10,326,968		(27,140)		(27,140)		10,299,829				198,084	10/15/2010
31393T-VN-3	FNMA REMIC SER 2003-100 KA (B-VADM) 5.000%		10/25/18	Paydown		19	19	18	19						19				1	10/25/2018
31393T-VN-3	FNMA REMIC SER 2003-100 KA (B-VADM) 5.000%		10/25/18	BOLI-SA PNC/National City		130,069	131,123	127,640	128,473		1,597		1,597		130,069				6,483	10/25/2018
31393W-AB-5	FHLMC REMIC SER 2640 ED (PAC) 4.500%		12/15/26	Paydown		2,371,917	2,371,917	2,421,579	2,376,837		(4,920)		(4,920)		2,371,917				51,771	11/15/2010
31393W-BR-9	FHLMC REMIC SER 2640 PZ (PAC Z) 5.000%		07/15/33	BOLI- SA Renasant Bank		885,147	982,739	867,876	870,185		14,962		14,962		885,147				53,095	07/15/2033
31393X-J4-0	FNMA REMIC SER 2004-27 NE (NAS) 4.500%		09/25/20	Paydown		2,016,215	2,016,215	2,042,047	2,020,075		(3,861)		(3,861)		2,016,215				50,000	12/25/2010
31394B-NS-9	FNMA REMIC SER 2004-87 UC (PAC) 4.500%		03/25/29	Paydown		556,806	556,806	554,892	555,049		1,756		1,756		556,806				22,029	03/25/2029
31394G-KL-6	FHLMC REMIC SER 2649 VA (VADM) 5.500%		06/15/14	Paydown		1,974,315	1,974,315	2,125,165	2,059,800		(85,486)		(85,486)		1,974,315				59,311	11/15/2013





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

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	For- eign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Con- sideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amor- tization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
873521-AT-5	CITY OF TACOMA WA LEASE REV 9.350% 03/15/22		09/15/2009	Various		630,000	630,000	630,000	630,000						630,000				52,594	03/15/2022
911760-AP-1	VA/VENDEE MTG TRUST 1992-1 2Z (ACRL) 7.750% 05/15/22		12/01/2009	Paydown		115,206	115,206	114,584	114,649		556		556		115,206				4,654	05/15/2022
911760-B6-0	VA/VENDEE MTG TRUST 1992-2 Z (ACRL) 7.250% 09/15/22		12/01/2009	Paydown		1,444,502	1,444,502	1,346,887	1,381,013		63,489		63,489		1,444,502				60,722	09/15/2022
911760-EJ-1	VA/VENDEE MTG TRUST 1994-2 3ZB (ACRL) 6.500% 06/15/24		12/01/2009	Paydown		2,714,767	2,714,767	2,309,513	2,447,944		266,823		266,823		2,714,767				99,745	06/15/2024
911760-JJ-6	VA/VENDEE MTG TRUST 1996-3 2Z (ACRL) 7.750% 10/15/26		12/01/2009	Paydown		1,032,675	1,032,675	1,007,045	1,013,669		19,006		19,006		1,032,675				41,216	10/15/2026
911760-TK-2	VA/VENDEE MTG TRUST SER 2003-2 J (VADM) 5.000% 06/15/10		12/01/2009	Paydown		657,982	657,982	688,542	664,665		(6,683)		(6,683)		657,982				17,956	06/15/2010
3199999	Bonds - U.S. Special Revenues					330,620,004	330,892,177	327,844,086	329,486,566		1,151,552		1,151,552		330,638,124		(18,119)	(18,119)	11,403,879	XXX
00077B-7C-1	AMAC SER 2002-10 1A26 (SUB/NAS) 5.750% 01/25/33		12/01/2009	Paydown		299,643	299,643	302,370	301,026		(1,383)		(1,383)		299,643				8,751	04/25/2031
00163X-AB-6	AMB PROPERTIES LP NTS 8.000% 11/01/10		05/06/2009	Tender Offer		3,000,000	3,000,000	3,695,910	3,194,149		(35,353)		(35,353)		3,158,797		(158,797)	(158,797)	123,333	11/01/2010
001765-BB-1	AMR CORP BASIC 4.500% 02/15/24 ACADEMICA CHARTER SCHOOL NOTES (TMU-144A)		02/17/2009	Direct		1,450,000	1,450,000	1,369,139	1,350,843		(2,183)		(2,183)		1,348,661		101,339	101,339	32,625	02/15/2024
00389C-AB-0	6.850% 08/15/12		08/15/2009	Call Cantor Fitzgerald & Company	100.0000	830,000	830,000	830,000	830,000						830,000				56,855	08/15/2012
004398-AE-3	ACCURIDE CORP 8.500% 02/01/15 AGUA CALIENTE BAND OF CAHUILLA Series B		10/08/2009	Redemption		1,225,000	2,000,000	400,000	1,983,043		7,834	1,583,743	(1,575,909)		407,134		817,866	817,866	85,000	02/01/2015
000000-00-0	6.440% 10/01/16		10/01/2009	Redemption 100.0000		249,000	249,000	249,000	249,000						249,000				16,036	10/01/2016
00753*-AK-5	Advance Drainage System 5.580% 06/27/15 AGUA CALIENTE BAND OF CAHUILLA Series 144A		06/25/2009	Redemption 100.0000		1,250,000	1,250,000	1,250,000	1,250,000						1,250,000					06/27/2015
008548-AE-9	6.080% 10/01/16		10/01/2009	Redemption 100.0000		402,000	402,000	402,000	402,000						402,000				24,442	10/01/2016
00868P-AA-3	AHOLD LEASE USA INC PTC SER 01-A2 8.620% 01/02/25		01/02/2009	Redemption 100.0000		727,634	727,634	736,098	746,890		1		1		746,891		(19,257)	(19,257)	31,361	01/02/2025
018772-AB-9	ALLIANCE ONE INTL INC BASIC 11.000% 05/15/12		07/02/2009	Tender Offer		1,167,375	1,100,000	1,130,938	1,126,480		(5,110)		(5,110)		1,121,370		46,005	46,005	76,297	05/15/2012
018772-AJ-2	ALLIANCE ONE INTL INC BASIC 8.500% 05/15/12		07/02/2009	Tender Offer		1,050,000	1,050,000	1,053,463	1,052,772		(368)		(368)		1,052,404		(2,404)	(2,404)	56,277	05/15/2012
021490-AJ-8	Countrywide Alt. Loan Trust Series 2006- HY13 Class 3A1 5.911% 01/25/47		12/01/2009	Paydown		1,951,263	1,951,263	1,909,764	1,959,296		41,366	49,399	(8,033)		1,951,263				64,047	01/25/2047
022089-AC-0	ALTRA INDUSTRIAL MOTION 9.000% 12/01/11		11/17/2009	Tender Offer Deutsche Bank Securities, Inc.		2,535,000	2,535,000	2,598,373	2,571,000		(16,219)		(16,219)		2,554,781		(19,781)	(19,781)	287,723	12/01/2011
023139-AB-4	AMBC DEBS 7.500% 05/01/23		07/30/2009	Various		4,290,000	13,000,000	6,941,688	7,003,400		72,674		72,674		7,076,074		(2,786,074)	(2,786,074)	739,375	05/01/2023
02378J-AU-2	AMERICAN AIRLINES 7.379% 05/23/16 AMERICAN HONDA FINANCE NTS 144A 4.500%		11/23/2009	Various		76,122	76,122	38,061	38,659		1,373		1,373		40,032		36,090	36,090	3,065	05/23/2016
02666Q-UW-1	05/26/09		05/26/2009	Maturity		4,500,000	4,500,000	4,490,415	4,499,158		842		842		4,500,000				101,250	05/26/2009
026710-AE-3	AMERICAN HSG TRUST II 1-D 8.300% 12/25/18		12/01/2009	Paydown		119,759	119,759	101,047	110,371		9,388		9,388		119,759				5,247	12/25/2018
02932N-AC-2	AMER ROCK SALT CO LLC 9.500% 03/15/14		04/13/2009	Call	104.7500	932,275	890,000	910,025	901,081		(847)		(847)		900,234		32,041	32,041	48,851	03/15/2014
031162-AN-0	AMGEN, INC. BASIC 0.125% 02/01/11 AMSOUTH BANCORPORATION UNSEC'D NOTES		08/07/2009	Various		1,759,370	1,875,000	1,840,667	1,853,964		2,905		2,905		1,856,869		(97,499)	(97,499)	1,660	02/01/2011
032165-AF-9	6.125% 03/01/09		03/01/2009	Various		9,445,000	9,445,000	10,419,155	9,477,256		(32,256)		(32,256)		9,445,000				289,253	03/01/2009
035229-AL-7	ANHEUSER-BUSCH CO DEBS 9.000% 12/01/09		12/01/2009	Maturity BOLI-SA PNC/National City		4,450,000	4,450,000	4,921,745	4,511,559		(61,559)		(61,559)		4,450,000				400,500	12/01/2009
035229-DD-2	ANHEUSER-BUSCH CO BASIC 5.500% 01/15/18		11/27/2009	City Banc of America Securities		1,745,490	2,000,000	1,723,160	1,725,507		19,984		19,984		1,745,490				150,333	01/15/2018
035287-AB-7	ANIXTER INC BASIC 5.950% 03/01/15		12/01/2009	Wachovia Capital Markets		992,425	1,070,000	981,725	1,004,448		8,097		8,097		1,012,545		(20,120)	(20,120)	80,112	03/01/2015
038521-AD-2	ARAMARK CORP 8.500% 02/01/15		08/28/2009	Various		975,000	1,000,000	1,000,000	1,000,000						1,000,000		(25,000)	(25,000)	92,319	02/01/2015
039483-AW-2	ARCHER DANIELS MIDLAND CO BASIC 0.875% 02/15/14		11/18/2009	Various		2,846,214	2,925,000	2,927,168	2,925,682		1,517		1,517		2,927,198		(80,984)	(80,984)	19,222	02/15/2014
039483-AY-8	ARCHER DANIELS MIDLAND CO BASIC 5.450% 03/15/18		11/27/2009	Various		1,859,182	2,000,000	1,844,760	1,847,898		11,285		11,285		1,859,182				130,800	03/15/2018

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

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
046003-DD-8	ASSOC CORP OF N AMER SUB DEBS 8.150%		08/01/2009	Maturity		1,000,000	1,000,000	929,950	995,705		4,295		4,295		1,000,000				81,500	08/01/2009
049560-AE-5	ATMOS ENERGY 4.000% 10/15/09		04/30/2009	Call 101.6420		8,445,434	8,309,000	7,875,852	8,204,341		42,898		42,898		8,247,239		198,194	198,194	180,029	10/15/2009
053505-AA-1	AVENTINE RENEWABLE ENERGY 10.000%		04/01/17	Deutsche Bank Securities, Inc.		430,000	2,000,000	360,000	1,235,830		9,795	885,335	(875,540)		360,290		69,710	69,710		04/01/2017
054303-AM-4	AVON PRODUCTS SR NTS 7.150% 11/15/09		11/15/2009	Maturity		4,810,000	4,810,000	5,073,481	4,847,087		(37,087)		(37,087)		4,810,000				343,915	11/15/2009
054937-AE-7	BBT CORPORATION NTS 5.200% 12/23/15		11/27/2009	BOLI-SA PNC/National City		1,745,951	1,750,000	1,743,053	1,745,449		502		502		1,745,951				84,428	12/23/2015
055381-AQ-0	BE AEROSPACE, INC BASIC 8.500% 07/01/18		08/25/2009	Credit Suisse First Boston		1,132,750	1,150,000	1,150,000	1,150,000						1,150,000		(17,250)	(17,250)	113,227	07/01/2018
056037-AD-6	BVPS II FNDG CRP CLOB (OHIO ED) 8.890% 06/01/17		12/01/2009	Various JP Morgan Securities, Inc.		1,333,000	1,333,000	1,396,783	1,366,346		(2,704)		(2,704)		1,363,642		(30,642)	(30,642)	97,301	06/01/2017
057741-AA-8	BALDOR ELECTRIC CO 8.625% 02/15/17		08/25/2009	Banc of America Funding Corp 2005-8 2A1		2,468,750	2,500,000	2,565,534	2,553,592		(4,580)		(4,580)		2,549,012		(80,262)	(80,262)	223,411	02/15/2017
05946X-XB-1	5.500% 01/25/36		12/01/2009	Paydown		1,027,113	1,027,113	1,021,817	1,022,126		4,987		4,987		1,027,113				35,440	01/25/2036
05947U-L9-7	4.742% 07/10/43		12/01/2009	Paydown		118,084	118,084	113,993	114,887		3,197		3,197		118,084				2,595	07/10/2043
05948X-RE-3	4.750% 08/25/33		12/01/2009	Paydown		6,308,013	6,308,013	6,301,113	6,294,707		13,306		13,306		6,308,013				191,498	08/25/2033
05949A-HZ-6	4.148% 07/25/34		05/29/2009	Direct		4,443,262	4,430,502	4,300,333	4,407,575		22,926		22,926		4,430,502		12,761	12,761	76,559	07/25/2034
05949A-HZ-6	4.148% 07/25/34		05/29/2009	Paydown		469,498	469,498	455,705	467,069		2,430		2,430		469,498				8,113	07/25/2034
05952F-AE-3	5.500% 05/25/37		12/01/2009	Paydown		11,969,069	11,969,069	11,731,962	11,837,310		236,666	104,906	131,760		11,969,069				324,990	05/25/2037
05952H-AG-4	5.750% 03/25/37		12/01/2009	Paydown		2,212,504	2,212,504	2,227,369	2,214,515		(2,011)		(2,011)		2,212,504				67,444	10/25/2011
05953Y-AY-7	5.500% 06/25/37		12/01/2009	Paydown		4,255,029	4,255,029	4,252,702	4,248,976		6,053		6,053		4,255,029				121,128	06/25/2037
064057-AZ-5	12/01/09		12/01/2009	Maturity		5,000,000	5,000,000	5,356,000	5,050,564		(50,564)		(50,564)		5,000,000				365,000	12/01/2009
06423R-BG-0	Bank One Issuance Trust 2004 - A1 A1 3.450% 10/17/11		02/17/2009	Call 100.0000		10,000,000	10,000,000	9,807,031	9,981,575		18,425		18,425		10,000,000				57,500	10/17/2011
072732-AC-4	BAYER CORP DEBS 144A 6.650% 02/15/28		11/27/2009	BOLI-SA PNC/National City		495,994	500,000	495,730	495,894		100		100		495,994				42,671	02/15/2028
07388V-AE-8	BEAR STEARNS COMMERCIAL MORTGA SERIES 2007T26 CLASS A4 5.471% 01/12/45		11/27/2009	BOLI-SA PNC/National City		1,813,105	2,000,000	1,790,938	1,795,621		17,484		17,484		1,813,105				108,204	01/12/2045
073905-CR-0	02/01/19		12/01/2009	Paydown		28,375	28,375	27,047	27,677		698		698		28,375				1,447	02/01/2019
079860-AF-9	BELLSOUTH CORP 4.200% 09/15/09		09/15/2009	Maturity		10,000,000	10,000,000	9,577,000	9,905,732		94,268		94,268		10,000,000				420,000	09/15/2009
09348T-AA-6	10.875% 07/15/12		07/29/2009	Tax Free Exchange		500,000	500,000	500,000	500,000						500,000				58,634	07/15/2012
113804-AA-6	10/01/20		10/01/2009	Redemption 100.0000		901,925	901,925	901,925	901,925						901,925				50,192	10/01/2020
12189P-AM-4	5.140% 01/15/21		07/15/2009	Various		101,018	101,018	101,018	101,018						101,018				4,066	01/15/2021
12189T-AM-6	6.125% 03/15/09		03/15/2009	Maturity		9,510,000	9,510,000	10,473,967	9,545,310		(35,310)		(35,310)		9,510,000				291,244	03/15/2009
12502C-AM-3	CCH II LLC/CCH II CAP CP 10.250% 09/15/10		12/01/2009	Taxable Exchange		1,948,494	1,220,000	1,085,800	1,225,314		(1,748)	137,766	(139,514)		1,085,800		862,694	862,694	75,618	09/15/2010
125152-AC-2	CE GENERATION LLC 7.416% 12/15/18		12/15/2009	Redemption 100.0000		9,533	9,533	9,485	9,492		2		2		9,494		38	38	530	12/15/2018
12543D-AF-7	COMMUNITY HEALTH SYSTEMS BASIC 8.875% 07/15/15		08/25/2009	Barclays Capital, Inc.		496,875	500,000	496,551	497,005		230		230		497,235		(360)	(360)	49,675	07/15/2015
12543P-AJ-2	Countrywide Home Loan Mortgage 2006-21 A9 5.750% 02/25/37		12/01/2009	Paydown		1,749,055	1,749,055	1,762,582	1,751,691		(2,635)		(2,635)		1,749,055				55,295	09/25/2010
125581-CS-5	CIT GROUP INC 5.850% 09/15/16		12/10/2009	Taxable Exchange		15,180,480	20,000,000	12,604,660	20,572,860		124,128	7,922,640	(7,798,512)		12,774,349		2,406,131	2,406,131	1,170,000	09/15/2016
12560P-DB-4	CIT GROUP INC NTS 4.750% 12/15/10		12/10/2009	Various		6,089,016	8,000,000	5,526,576	8,009,428		156,394	2,479,345	(2,322,951)		5,686,477		402,539	402,539	190,000	12/15/2010

E14.9



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

**SCHEDULE D - PART 4**

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

1 CUSIP Identification	2 Description	3 Foreign	4 Disposal Date	5 Name of Purchaser	6 Number of Shares of Stock	7 Consideration	8 Par Value	9 Actual Cost	10 Prior Year Book/ Adjusted Carrying Value	Change In Book/Adjusted Carrying Value					16 Book/ Adjusted Carrying Value at Disposal Date	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Bond Interest/ Stock Dividends Received During Year	21 Maturity Date
										11 Unrealized Valuation Increase/ Decrease	12 Current Year's (Amortization)/ Accretion	13 Current Year's Other Than Temporary Impairment Recognized	14 Total Change in Book/ Adjusted Carrying Value (11+12-13)	15 Total Foreign Exchange Change in Book/ Adjusted Carrying Value						
125896-AW-0	CMS ENERGY HLDG CO 2.875% 12/01/24		09/18/2009	Various		548,523	500,000	596,234	555,198		(12,947)		(12,947)		542,250		6,273	6,273	11,045	12/01/2024
12613Y-AB-5	CNL FUNDING 2000-AA A2 (MBIA-FRAN 144A) 8.04% 04/25/17		12/01/2009	Paydown		2,280,994	2,280,994	2,350,046	2,319,234		(32,482)	5,759	(38,241)		2,280,994				81,202	02/25/2017
12616F-AD-9	CPG PARTNERS LP UNSEC'D NTS 3.500% 03/15/09		03/15/2009	Maturity Redemption		3,000,000	3,000,000	2,986,020	2,999,389		611		611		3,000,000				52,500	03/15/2009
126650-AF-7	CVS CORP PTC 144A 7.770% 01/10/12		12/10/2009	100.0000		235,348	235,348	285,374	256,719		(3,073)		(3,073)		253,646		(18,298)	(18,298)	10,022	01/10/2012
126650-AL-4	CVS CORP PTC 144A 6.117% 01/10/13		12/10/2009	Various		376,664	376,664	376,664	376,664						376,664				12,597	01/10/2013
126650-AW-0	CVS CORP 144A 5.298% 01/11/27		12/10/2009	Various		1,405,526	1,405,526	1,392,277	1,393,334		127		127		1,393,461		12,064	12,064	40,327	01/11/2027
126650-AW-0	CVS CORP 144A 5.298% 01/11/27		11/27/2009	BOLI-SA PNC/National City		2,090,449	2,095,000	2,089,972	2,090,382		67		67		2,090,449				106,985	01/11/2027
126650-AY-6	CVS CORP Series 144 A 5.361% 10/10/27		12/10/2009	Various		435,097	435,097	435,097	435,097						435,097				12,738	10/10/2027
12669D-4H-8	COUNTRYWIDE HOME LOANS SER 2003-11 A6 (B-PAC/SUB) 5.000% 05/25/33		12/01/2009	Paydown		1,922,733	1,922,733	1,922,733	1,922,733						1,922,733				77,922	05/25/2033
12669E-4P-8	COUNTRYWIDE HOME LOANS SER 2003-20CB 1A3 (SEQ) 5.500% 08/25/14		12/01/2009	Paydown		968,866	968,866	1,011,254	992,247		(23,381)		(23,381)		968,866				29,106	08/25/2014
12669E-ST-4	COUNTRYWIDE HOME LOANS SER 2003-28 A2 (PAC-SUB) 4.150% 08/25/33		12/01/2009	Paydown		4,838,014	4,838,014	4,834,991	4,830,641		7,374		7,374		4,838,014				117,541	08/25/2033
12669F-F3-2	COUNTRYWIDE HOME LOANS SER 2004-J5 A5 (NAS) 5.500% 07/25/34		12/01/2009	Paydown		569,901	569,901	549,064	553,896		16,004		16,004		569,901				23,076	07/25/2034
12669F-UJ-8	COUNTRYWIDE HOME LOANS 2004-5 2A14 5.000% 05/25/34		12/01/2009	Paydown		6,044,874	6,044,874	6,044,874	6,044,874						6,044,874				178,028	05/25/2034
127391-AA-8	CADETS TRUST Series 144A 4.800% 07/15/13		11/27/2009	BOLI-SA PNC/National City		1,997,301	2,000,000	1,993,560	1,996,697		603		603		1,997,301				131,200	07/15/2013
12806*-AC-5	CAIT LONG PRIVATE PLACEMENT 5.640% 01/15/32		01/15/2009	Tax Free Exchange		1,446,067	1,446,067	1,446,067	1,446,067						1,446,067				40,779	01/15/2032
133131-AG-7	CAMDEN PROPERTY TRUST SR UNSEC'D NTS 7.625% 02/15/11		05/01/2009	Direct		1,500,000	1,500,000	1,694,010	1,569,595		(10,324)		(10,324)		1,559,272		(59,272)	(59,272)	81,333	02/15/2011
134011-AA-3	CAMP PENDLTON/QUANTICO NTS SER 2003 A-1 (144A-MBIA) 5.937% 10/01/43		04/01/2009	Direct		35,000	35,000	35,000	35,000						35,000				1,039	10/01/2043
134011-AA-3	CAMP PENDLTON/QUANTICO NTS SER 2003 A-1 (144A-MBIA) 5.937% 10/01/43		10/01/2009	Redemption		35,000	35,000	35,000	35,000						35,000				2,078	10/01/2043
13861F-AA-5	Cantor 5.190% 04/01/10		07/01/2009	Direct		4,000,000	4,000,000	4,000,000	4,000,000						4,000,000				161,700	04/01/2010
144141-CK-2	CAROLINA PWR & LT SR NTS 5.950% 03/01/09		03/01/2009	Maturity		635,000	635,000	648,856	635,408		(408)		(408)		635,000				18,891	03/01/2009
14743R-AB-9	CASE CORP NOTES 7.250% 01/15/16		08/25/2009	Goldman Sachs & Co.		1,417,500	1,500,000	1,500,000	1,500,000						1,500,000		(82,500)	(82,500)	121,740	01/15/2016
153527-AF-3	CENTRAL GARDEN & PET CO SR SUB NTS 9.125% 02/01/13		09/02/2009	Barclays Capital, Inc.		1,256,250	1,250,000	1,293,750	1,272,316		(6,961)		(6,961)		1,265,355		(9,105)	(9,105)	125,786	02/01/2013
156431-AE-8	CENTURY ALUMINUM COMPANY BASIC 1.750% 08/01/24		08/05/2009	MCMAHON		85,313	100,000	65,476	65,668		910		910		66,578		18,735	18,735	1,794	08/01/2024
161623-AL-7	CHASE RV OWNER TRUST 1997-A B (ABS-RV) 6.540% 08/15/17		12/15/2009	Paydown		468,474	468,474	471,110	468,983		(508)		(508)		468,474				14,991	03/15/2012
161630-BX-5	CHASE MORTGAGE FINANCE CORP 2007-A1 12A1 5.944% 03/25/37		12/01/2009	Paydown		1,762,672	1,762,672	1,764,806	1,760,167		2,504		2,504		1,762,672				54,674	07/25/2011
163893-AA-8	Chemtura Corp 6.875% 06/01/16		06/08/2009	Deutsche Bank Securities, Inc.		5,737,350	8,315,000	3,741,750	8,112,722		4,423	4,375,395	(4,370,972)		3,741,750		1,995,600	1,995,600		06/01/2016
165167-BY-2	CHESAPEAKE ENERGY CORP 7.625% 07/15/13		08/25/2009	Credit Suisse First Boston		2,122,200	2,160,000	2,122,546	2,133,684		3,268		3,268		2,136,952		(14,752)	(14,752)	184,373	07/15/2013
17305E-DA-0	Citibank Credit Card Issuance Series 2006 Class A2 4.850% 02/10/11		02/10/2009	Various		12,025,000	12,025,000	11,969,332	12,020,121		4,879		4,879		12,025,000				291,606	02/10/2011
17311Q-BE-9	CITIGROUP COMMERCIAL MORTGAGE SERIES 2007C6 CLASS A1 5.622% 12/10/49		12/01/2009	Paydown		879,377	879,377	868,625	870,391		8,985		8,985		879,377				27,995	12/10/2049
184496-AD-9	Clean Harbors 11.250% 07/15/12		08/31/2009	Call 102.8130		176,838	172,000	191,125	180,723		(1,433)		(1,433)		179,290		(2,451)	(2,451)	21,823	07/15/2012
184502-AR-3	CLEAR CHANNEL COMMUNICATIONS NTS 4.400% 05/15/11		08/11/2009	Various		2,921,000	6,500,000	2,600,000	6,495,815		(17,800)	3,896,654	(3,914,454)		2,581,361		339,639	339,639	210,381	05/15/2011
186108-BV-7	CLEVELAND ELEC ILLUM CO FMB SER D 7.430% 11/01/09		11/01/2009	Maturity		2,153,000	2,153,000	2,442,943	2,194,959		(41,959)		(41,959)		2,153,000				159,968	11/01/2009
191098-AH-5	COCA-COLA BOTTLING CO CONSOL 5.000% 06/15/16		11/27/2009	BOLI-SA PNC/National City		990,348	1,000,000	985,621	989,251		1,097		1,097		990,348				47,500	06/15/2016

E14.10

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
193908-AS-9	CMOT SER 57-D (B-PAC) 9.900% 02/01/19		12/01/2009	Paydown		9,884	9,884	9,699	9,809		.75		.75		9,884				434	02/01/2019
193900-AF-7	CMOT SER 46 C (B-TAC) 9.500% 09/01/18		12/01/2009	Paydown		4,792	4,792	4,629	4,748		.44		.44		4,792				219	09/01/2018
195891-AF-3	COLONIAL REALTY LP NTS 4.800% 04/01/11		05/04/2009	Tender Offer		1,351,850	1,423,000	1,421,492	1,422,459		.77		.77		1,422,537		(70,687)	(70,687)	83,103	04/01/2011
197670-AL-9	COLUMBIA/HCA HEALTHCARE NTS 8.700% 02/10/10		08/26/2009	Citigroup Global Markets		1,503,750	1,500,000	1,681,305	1,536,192		(21,337)		(21,337)		1,514,854		(11,104)	(11,104)	92,800	02/10/2010
20030N-AG-6	COMCAST CORP 4.950% 06/15/16		11/27/2009	BOLI-SA PNC/National City		945,893	1,000,000	933,490	939,927		5,966		5,966		945,893				47,025	06/15/2016
20047P-BA-4	COMMERCIAL MTGE PRVT PL 2005-LP5 GMB2 144A 5.248% 05/10/43		10/01/2009	Paydown		4,000,000	4,000,000	4,032,916	4,004,551		(4,551)		(4,551)		4,000,000				174,933	02/10/2010
20047P-BB-2	COMMERCIAL MTGE PRVT PL 2005-LP5 GMB3 5.493% 05/10/43		10/01/2009	Paydown		4,600,000	4,600,000	4,656,265	4,609,795		(9,795)		(9,795)		4,600,000				210,565	02/10/2010
20047P-BC-0	COMMERCIAL MTGE PRVT PL Series 2005-LP5 Class GMB 144A 5.738% 05/10/43		10/01/2009	Paydown		3,649,999	3,649,999	3,716,674	3,663,310		(13,311)		(13,311)		3,649,999				174,531	02/10/2010
201736-AA-3	COMM'L MTG LEASE-BACKED CERTS 2001-CMLB A1 (MBIA-144A) 6.746% 06/20/31		12/01/2009	Paydown		951,181	951,181	969,388	959,105		(7,924)		(7,924)		951,181				35,833	11/20/2015
20449C-AA-8	COMPASS BANK BASIC 8.100% 08/15/09		08/15/2009	Maturity		5,000,000	5,000,000	5,848,450	5,119,986		(119,986)		(119,986)		5,000,000				405,000	08/15/2009
20449E-AA-4	COMPASS BANK SUB NTS 6.450% 05/01/09		05/01/2009	Maturity		500,000	500,000	554,425	503,899		(3,899)		(3,899)		500,000				16,125	05/01/2009
208464-BH-9	CONSECO FINANCIAL TRUST 3.500% 09/30/35		11/13/2009	Direct		2,050,000	2,050,000	1,645,838	1,846,980		435	210,831	(210,396)		1,636,584		413,416	413,416	80,320	09/30/2035
21036P-AG-3	CONSTITUTION BRANDS INC BASIC 8.375% 12/15/14		08/26/2009	Barclays Capital, Inc.		918,575	905,000	899,063	899,802		462		462		900,263		18,312	18,312	53,898	12/15/2014
210518-BX-3	CONSUMERS ENERGY CO NTS 4.800% 02/17/09		02/17/2009	Maturity		2,000,000	2,000,000	2,048,100	2,001,333		(1,333)		(1,333)		2,000,000				48,533	02/17/2009
210805-DB-0	CONTINENTAL AIRLINES ETC SERIES 2000-1 8.499% 11/01/12		05/01/2009	Redemption 100.0000		50,126	50,126	47,474	48,438		122		122		48,561		1,565	1,565	2,130	11/01/2012
216669-AG-6	COOPER INDS LTD CL A UNSEC'D SR NTS 5.500% 11/01/09		11/01/2009	Maturity		5,000,000	5,000,000	4,972,450	4,996,159		3,841		3,841		5,000,000				275,000	11/01/2009
216762-AB-0	COOPER STANDARD AUTO BASIC 7.000% 12/15/12		10/07/2009	Broadpoint Credit Suisse First Boston		244,138	405,000	210,600	121,500		242,468	3,946	157,314	89,100	210,600		33,538	33,538		12/15/2012
216762-AD-6	COOPER STANDARD AUTO 8.375% 12/15/14		07/14/2009	Boston		45,000	750,000	45,000	131,250		452,096	8,545	546,891	(86,250)	45,000					12/15/2014
22540A-AT-5	INDYMAC MANUFAC HOUSING SERIES 1997C1 CLASS E 7.500% 06/20/29		12/01/2009	Paydown		6,285,281	6,285,281	6,238,142	6,239,756		45,525		45,525		6,285,281				249,745	06/20/2029
22541S-2R-8	CS FIRST BOSTON MORTGAGE SEC Series 2004-C5 Class AAB 4.587% 11/15/37		12/01/2009	Paydown		227	227	228	227						227				10	11/15/2013
233046-AB-7	DB MASTER FINANCE LLC 2006-1 M1 144A 8.285% 06/20/31		01/01/2009	Paydown		(575)	(575)	(582)	(575)						(575)				(8,630)	06/20/2031
23321P-C4-8	DLJ MTG SERIES 1996-CF2 CLASS S 144A 1.683% 11/12/21		12/01/2009	Paydown				1,681	1,630		(1,630)		(1,630)						1,267	08/12/2016
233331-AG-2	DTE ENERGY UNSEC'D SR NTS SER A 6.650% 04/15/09		04/15/2009	Maturity		10,000,000	10,000,000	10,342,100	10,033,399		(33,399)		(33,399)		10,000,000				332,500	04/15/2009
242361-AB-9	DEAN FOODS CO BASIC 6.900% 10/15/17		11/03/2009	Various		1,484,000	1,600,000	1,644,000	1,633,495		(2,279)		(2,279)		1,631,216		(147,216)	(147,216)	110,170	10/15/2017
24240V-AM-3	DEAN WITTER, DISCOVER DEBS 6.750% 01/01/16		11/27/2009	Various		2,314,183	2,300,000	2,308,839	2,315,924		(1,742)		(1,742)		2,314,183				218,213	01/01/2016
251591-AH-6	DEVELOPERS DIVERS REALTY UNSEC'D NTS 3.875% 01/30/09		01/30/2009	Maturity		3,000,000	3,000,000	2,843,790	2,997,050		2,950		2,950		3,000,000				58,125	01/30/2009
254063-AG-5	DILLARD DEPARTMENT STORES DEBS 9.500% 09/01/09		09/01/2009	Maturity		2,000,000	2,000,000	2,265,997	2,039,648		(39,648)		(39,648)		2,000,000				190,000	09/01/2009
257469-AH-9	DOMINION RESOURCES INC UNSEC'D SR NTS 5.125% 12/15/09		12/15/2009	Maturity		265,000	265,000	269,653	265,756		(756)		(756)		265,000				13,581	12/15/2009
260543-BH-5	DOW CHEMICAL UNSEC'D DEBS 5.970% 01/15/09		01/15/2009	Maturity		1,625,000	1,625,000	1,643,516	1,625,127		(127)		(127)		1,625,000				48,506	01/15/2009
263578-AG-1	DUANE READE INC 4.754% 12/15/10		08/07/2009	Tender Offer		970,000	1,000,000	1,004,471	1,000,000						1,000,000		(30,000)	(30,000)	68,154	12/15/2010
26441Y-AD-9	DUKE REALTY CORP SR NTS 6.950% 03/15/11		09/29/2009	Various		1,620,000	1,600,000	1,831,390	1,679,385		(25,804)		(25,804)		1,653,580		(33,580)	(33,580)	163,524	03/15/2011
268648-AK-8	EMC CORP MASS BASIC 1.750% 12/01/11		12/21/2009	Various		302,041	250,000	246,768	246,768		1,005		1,005		247,773		54,268	54,268	4,449	12/01/2011
26882P-AN-2	ERAC USA FINANCE CO NOTES 144A 8.000% 01/15/11		11/27/2009	BOLI-SA PNC/National City		2,148,779	2,100,000	2,393,160	2,185,590		(36,811)		(36,811)		2,148,779				229,600	01/15/2011
26884A-AV-5	EQUITY RESIDENTIAL PROPERTIES 3.850% 08/15/26		12/31/2009	Various		3,678,891	3,700,000	3,639,953	3,641,227		2,097		2,097		3,643,324		35,567	35,567	186,062	08/15/2026
277461-BE-8	EASTMAN KODAK 3.375% 10/15/33		10/19/2009	Various		5,027,375	5,050,000	4,829,943	4,828,260		(574)		(574)		4,827,686		199,689	199,689	171,159	10/15/2033
294752-AA-8	EQUITY ONE INC NTS 3.875% 04/15/09		04/15/2009	Maturity		1,000,000	1,000,000	998,750	999,924		.76		.76		1,000,000				19,375	04/15/2009

E14.11

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

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/Decrease	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Maturity Date
302567-AA-0	FPL ENERGY AMERICAN WIND NTS 144A 6.639% 06/20/23		06/20/2009	Redemption		602,250	602,250	602,250	602,250						602,250				39,983	06/20/2023
302568-AA-8	FPL ENERGY CAITHNESS FUNDING SR SEC NOTES 144A 7.645% 12/31/18		12/31/2009	Redemption		470,667	470,667	470,667	470,667						470,667				35,982	12/31/2018
302569-AA-6	FPL ENERGY VIRGINIA FDG SR NTS 144A 7.520% 06/30/19		12/31/2009	Various		839,080	839,080	891,769	886,565		(4,723)		(4,723)		881,842		(42,762)	(42,762)	46,028	06/30/2019
306035-AC-0	FALCON FRANCHISE LOAN LLC SER 1999-1 B (FRAN-144A) 8.289% 12/05/12		12/01/2009	Paydown		965,678	965,678	1,084,578	994,053		(28,375)		(28,375)		965,678				64,027	06/05/2010
31331F-AV-3	FEDERAL EXPRESS EETC 1997-B 7.520% 01/15/18		01/15/2009	Redemption		836,126	836,126	876,461	851,209		(125)		(125)		851,084		(14,958)	(14,958)	31,438	01/15/2018
31410H-AP-6	FEDERATED DEPT STORES NTS 6.300% 04/01/09		04/01/2009	Various		7,500,000	7,500,000	7,748,164	7,510,932		(10,932)		(10,932)		7,500,000				236,250	04/01/2009
31410H-AS-0	FEDERATED DEPT STORES UNSEC'D SR NTS 6.625% 04/01/11		12/17/2009	Various		7,677,150	7,530,000	8,435,257	7,843,543		(119,261)		(119,261)		7,724,281		(47,131)	(47,131)	565,560	04/01/2011
32051D-X4-9	FIRST HORIZON ASSET SECURITIES 2004-2 1A6 6.000% 05/25/34		12/01/2009	Paydown		2,510,991	2,510,991	2,515,699	2,513,851		(2,860)		(2,860)		2,510,991				73,545	02/25/2011
32051G-NS-0	FIRST HORIZON MTG PASS-THROUGH 2005-8 1A3 5.750% 02/25/36		12/01/2009	Paydown		1,738,504	1,738,504	1,750,625	1,744,713		(6,209)		(6,209)		1,738,504				56,070	05/25/2010
32056F-AA-0	FIRST HORIZON MORTGAGE PASS-TH SERIES 20075 CLASS A1 6.250% 11/25/37		12/01/2009	Paydown		870,213	870,213	750,526	755,041		115,172		115,172		870,213				29,765	11/25/2037
32056F-AD-4	FIRST HORIZON MORTGAGE PASS-TH SERIES 20075 CLASS A4 6.250% 11/25/37		12/01/2009	Paydown		2,610,638	2,610,638	2,176,824	2,197,918		412,720		412,720		2,610,638				89,288	11/25/2037
340711-AG-5	FLORIDA GAS TRANS CO SR NOTES 144A 9.190% 11/01/24		11/01/2009	Various		900,000	900,000	961,781	951,786		(1,393)		(1,393)		950,394		(50,394)	(50,394)	82,710	11/01/2024
34460X-AA-7	FONTEINBLEAU LAS VEGAS SERIES 144A 10.250% 06/15/15		06/12/2009	Oppenheimer		31,000	620,000	18,600	411,154		7,695	396,777	(389,082)		22,071		8,929	8,929		06/15/2015
34528C-AB-1	FORD CREDIT AUTO OWNER TRUST SER 2006-C (ABS) 5.290% 12/15/09		01/15/2009	Call		100,000	4,626	4,618	4,626						4,626				20	12/15/2009
345397-UK-7	FORD MOTOR CREDIT CO 4.734% 04/15/12		01/01/2009	Taxable Exchange		506,631	500,000	510,000	554,460		(47,829)		(47,829)		506,631				9,252	04/15/2012
345397-UK-7	FORD MOTOR CREDIT CO 4.734% 04/15/12		01/01/2009	Tax Free Exchange		(506,631)	(500,000)	(510,000)	(554,460)						(554,460)		47,829	47,829		04/15/2012
350259-AB-3	FOSTERS FIN CORP 144A 4.875% 10/01/14		11/27/2009	City		292,410	300,000	286,755	291,200		1,210		1,210		292,410				16,900	10/01/2014
35671D-AS-4	FREEMPORT-MCMORAN COPPER -B 8.375% 04/01/17		08/28/2009	Wachovia Capital Markets		410,800	395,000	395,000	395,000						395,000		15,800	15,800	30,416	04/01/2017
35687M-AM-9	FREESCALE SEMICONDUCTOR BASIC 8.875% 12/15/14		03/17/2009	Taxable Exchange Deutsche Bank Securities, Inc.		933,917	4,860,000	4,900,856	4,895,689		(4,558)		(4,558)		4,891,132		(3,957,215)	(3,957,215)	110,228	12/15/2014
36155W-AC-0	GCI INC. 7.250% 02/15/14		09/10/2009			281,250	300,000	262,500	265,257		3,805		3,805		269,062		12,188	12,188	23,563	02/15/2014
361849-IG-6	GMAC COMM MTG SEC SERIES 2005C1 CLASS A2 4.471% 05/10/43		12/01/2009	Paydown		15,052,437	15,052,437	14,940,720	14,976,494		75,943		75,943		15,052,437				547,599	05/10/2043
36185N-L5-7	GMAC MTG CORP LOAN SER 2003-J9 A12 (VADM- NAS) 5.500% 01/25/34		12/01/2009	Paydown		977,872	977,872	1,009,195	995,232		(17,359)		(17,359)		977,872				29,377	11/25/2011
36185N-UY-4	GMAC MTG CORP LOAN SER 2002-J7 A7 (SUPP) MBIA 5.750% 11/25/32		12/01/2009	Paydown		160,237	160,237	162,040	161,249		(1,011)		(1,011)		160,237				4,881	12/25/2030
36228C-VU-4	GS MTG SEC CORP II SERIES 2005GG4 CLASS A4A 4.751% 07/10/39		01/27/2009	BOLI-SA Pool #1 MBS BOLI-SA PNC/National City		818,701	1,000,000	818,438	818,470		231		231		818,701				7,390	07/10/2039
362320-AT-0	GTE CORP DEBS 8.750% 11/01/21		11/27/2009	BOLI-SA PNC/National City		1,186,582	1,000,000	1,239,870	1,195,740		(9,157)		(9,157)		1,186,582				93,819	11/01/2021
362333-AH-9	GTE FLA INC DEBS 6.860% 02/01/28		11/27/2009	BOLI-SA PNC/National City		999,582	1,000,000	999,480	999,571		10		10		999,582				90,704	02/01/2028
36246L-AA-9	GS MORTGAGE SECURITIES CORPORA SERIES 2007GG10 CLASS A1 5.690% 08/10/45		12/01/2009	Paydown		218,806	218,806	214,190	215,088		3,718		3,718		218,806				7,194	08/10/2045
364725-AC-5	GANNETT CO INC NOTES 6.375% 04/01/12		04/08/2009	Boston Redemption		340,000	500,000	310,494	525,539		(147)	213,262	(213,409)		312,130		27,870	27,870	17,089	04/01/2012
368907-AD-3	GENERAL AMERICAN TRANS 7.860% 08/28/21 GENERAL MILLS INC NTS SER E 5.390%		02/28/2009	100,000		5,454	5,454	5,454	5,454						5,454				214	08/28/2021
37033L-FG-6	01/20/09		01/20/2009	Maturity		5,000,000	5,000,000	5,305,350	5,003,464		(3,464)		(3,464)		5,000,000				93,576	01/20/2009

E14.12

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
370488-AA-2	INTERNATIONAL GROUP Private Placement 6.570% 06/28/20		07/06/2009	Redemption	100.0000		325,000	325,000	325,000						325,000				9,650	06/28/2020
373200-AQ-7	Georgia Gulf Corporation 9.500% 10/15/14		08/17/2009	Tax Free Exchange		177,952	715,000	214,500	214,574		13,566		13,566		228,140		(50,188)	(50,188)		10/15/2014
373200-AT-1	GLAXOSMITHKLINE CAP INC BASIC 5.650%		08/17/2009	Tax Free Exchange		141,460	1,565,000	109,550	1,077,376		38,963	975,006	(936,043)		141,333		127	127		10/15/2016
377372-AD-9	BOLLSA PNC/National City		11/27/2009			1,006,476	1,000,000	1,007,310	1,007,005		(529)		(529)		1,006,476				58,383	05/15/2018
393505-QY-1	GREEN TREE FINANCIAL CORP SER 1996-9 A6 (CMT-MH) 7.690% 01/15/28		12/15/2009	Paydown		234,506	234,506	258,690	253,381		(18,875)		(18,875)		234,506				9,561	03/15/2022
393505-RG-9	GREEN TREE FINANCIAL CORP SER 1996-10 A5 (CMT-MH) 6.830% 11/15/28		12/15/2009	Paydown		24,692	24,692	26,193	24,746		(54)		(54)		24,692				888	02/15/2010
404119-BA-6	HCA - THE HEALTHCARE CO BASIC 9.625%		11/15/16	Direct		755	832	832	832						832		(77)	(77)	43	11/15/2016
441060-AB-6	HOSPIRA INC BASIC 4.950% 06/15/09		06/15/2009	Maturity		21,803,000	21,803,000	21,425,769	21,746,520		56,480		56,480		21,803,000				539,624	06/15/2009
450688-AF-3	ITT HARTFORD GROUP INC DEBS 7.300%		11/01/15	BOLLSA PNC/National City		1,019,193	1,000,000	1,040,600	1,021,496		(2,303)		(2,303)		1,019,193				78,272	11/01/2015
452092-CG-2	IL PIWR CO 7.500% 06/15/09		06/15/2009	Maturity		4,849,000	4,849,000	5,159,336	4,894,722		(45,722)		(45,722)		4,849,000				181,838	06/15/2009
452558-AR-0	IMPERIAL BANK SUB NTS 8.500% 04/01/09		04/01/2009	Maturity		1,000,000	1,000,000	1,102,650	1,004,439		(4,439)		(4,439)		1,000,000				42,500	04/01/2009
45661T-AD-3	INERGY LP/ INERGY FIN 8.250% 03/01/16		08/26/2009	Wachovia Capital Markets		306,125	310,000	310,000	310,000						310,000		(3,875)	(3,875)	25,575	03/01/2016
460146-BY-8	INTERNATIONAL PAPER CO NTS 4.000%		04/01/10	Tender Offer		6,060,000	6,000,000	5,994,780	5,998,838		349		349		5,999,187		60,813	60,813	152,667	04/01/2010
46294*-AB-4	Iron Ore of Canada 6.600% 11/02/17		10/30/2009	Redemption	100.0000		1,111,124	1,111,124	1,111,124						1,111,124				36,667	11/02/2017
46630P-AP-0	JP MORGAN MORTGAGE TRUST 2007-A2 3A1 5.815% 04/25/37		12/01/2009	Paydown		894,830	894,830	896,472	894,639		190		190		894,830				30,054	11/25/2012
46630U-AC-8	JP Morgan Mortgage Trust 2007-A3 2A1 5.755% 05/25/37		12/01/2009	Paydown		4,542,167	4,542,167	4,441,387	4,536,269		106,388	100,491	5,897		4,542,167				152,440	05/25/2037
477143-AC-5	Jetblue Airways 3.750% 03/15/35		05/05/2009	Pershing/CJS Securities		710,000	775,000	603,652	559,422	45,818	934		46,752		606,174		103,826	103,826	18,633	03/15/2035
485260-BH-5	KANSAS GAS & ELECTRIC 5.647% 03/29/21		09/29/2009	Various		802,615	802,615	808,235	807,489		(211)		(211)		807,278		(4,662)	(4,662)	45,324	03/29/2021
49446Q-AJ-0	KIMCO REALTY CORP MTN 7.060% 07/14/09		07/14/2009	Various		1,850,000	1,850,000	2,060,711	1,871,562		(21,562)		(21,562)		1,850,000				102,674	07/14/2009
494550-AH-9	KINDER MORGAN ENERGY PRTRNS NOTES 6.750%		03/15/11	BOLLSA PNC/National City		1,998,411	2,000,000	1,991,280	1,997,383		1,028		1,028		1,998,411				162,000	03/15/2011
499040-AP-8	KNIGHT-RIDDER INC. 5.750% 09/01/17		04/22/2009	Citigroup Global Markets		180,000	1,200,000	144,000	192,051		5,154	52,388	(47,234)		144,818		35,182	35,182	45,233	09/01/2017
499040-AP-8	KNIGHT-RIDDER INC. 5.750% 09/01/17		06/26/2009	Various		1,256,120	12,400,000	1,488,000	8,082,773		81,220	6,664,591	(6,583,371)		1,499,401		(243,281)	(243,281)	584,264	09/01/2017
502413-AJ-6	L-3 COMMUNICATIONS CORP SR SUB NTS 7.625% 06/15/12		08/25/2009	JP Morgan Securities, Inc.		2,512,500	2,500,000	2,500,000	2,500,000						2,500,000		12,500	12,500	133,967	06/15/2012
502413-AQ-0	L-3 COMMUNICATIONS CORP SR SUB NTS 6.125% 01/15/14		08/25/2009	Barclays Capital, Inc.		4,787,500	5,000,000	4,637,500	4,702,961		32,823		32,823		4,735,784		51,716	51,716	342,830	01/15/2014
52108H-SZ-8	LB-LBS COMMERCIAL MTGE TRUST 2003-C5 A3 4.254% 07/15/27		12/11/2009	Paydown		572,425	572,425	558,058	566,311		6,115		6,115		572,425				16,896	07/15/2027
521865-AQ-8	Lear Corp BASIC 8.750% 12/01/16		11/18/2009	Tax Free Exchange		572,338	2,750,000	563,750	2,427,947		15,023	1,870,631	(1,855,608)		572,338					12/01/2016
52467@-AY-1	LENNAR CORP UNSEC'D SR NTS 7.625%		12/15/2009	Redemption	100.0000		103,708	103,708	118,305		(213)		(213)		117,434		(13,726)	(13,726)	4,239	01/15/2027
526057-AB-0	LEUCADIA NATL 8.125% 09/15/15		03/01/2009	Maturity		1,534,000	1,534,000	1,820,152	1,542,963		(8,963)		(8,963)		1,534,000				58,484	03/01/2009
527288-BD-5	LEUCADIA NATL 8.125% 09/15/15		11/02/2009	Jefferies & Co., Inc.		1,776,250	1,750,000	1,751,053	1,750,974		(115)		(115)		1,750,859		25,391	25,391	161,936	09/15/2015
53219L-AG-4	LIFEPOINT HOSPITALS INC 3.250% 08/15/25		08/26/2009	Credit Suisse First Boston		770,888	915,000	541,110	541,685		7,761		7,761		549,446		221,442	221,442	31,059	08/15/2025
53219L-AH-2	LIFEPOINT HOSPITALS INC BASIC 3.500%		05/15/14	Various		313,673	380,000	228,950	229,646		9,815		9,815		239,462		74,212	74,212	8,356	05/15/2014
538021-AM-8	LITTON INDUSTRIES INC BASIC 8.000%		10/15/2009	Various		10,350,000	10,350,000	11,233,738	10,559,903		(209,903)		(209,903)		10,350,000				828,000	10/15/2009
55264T-DP-3	MEANA CREDIT CARD MASTER NOTE 2006-A1 A1 4.900% 07/15/11		02/17/2009	Call	100.0000		13,900,000	13,900,000	13,891,691		785		785		13,899,994		6	6	113,517	07/15/2011

E14.13

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21	
										11	12	13	14	15							
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date	
55274S-AK-7	MASTER ASSET SECURITIZATION 2006-3 1A10		12/01/2009	Paydown		6,800,469	6,800,469	6,836,026	6,816,202		(15,733)		(15,733)		6,800,469					218,916	04/25/2012
574754-AB-3	6.00% 10/25/36 MASHANTUCKET WSTRN POT TRIBE SPECIAL REV 98		09/01/2009	Various		500,000	500,000	550,836	527,850		(3,605)		(3,605)		524,246		(24,246)	(24,246)		32,850	09/01/2013
576203-AH-6	A 144A TAXABLE 6.570% 09/01/13 MASSEY ENERGY CO 6.875% 12/15/13		08/28/2009	Various		2,166,700	2,305,000	2,140,888	2,177,275		14,430		14,430		2,191,705		(25,005)	(25,005)		113,129	12/15/2013
577778-AT-0	MAY DEPT STORES CO DEB 9.500% 04/15/21		10/15/2009	100.0000		41,500	41,500	45,950	44,549		(159)		(159)		44,390		(2,890)	(2,890)		2,957	04/15/2021
585055-AJ-5	MEDTRONIC INC 144A 1.500% 04/15/11		08/12/2009	Barclays Capital, Inc.		294,750	300,000	323,250	319,388		(5,353)		(5,353)		314,035		(19,285)	(19,285)		3,775	04/15/2011
585055-AL-0	MEDTRONIC INC 1.500% 04/15/11 MORGANBERRY CORP SER 1 A (SEQ-144A)		05/11/2009	Various		448,388	475,000	511,812	505,698		(2,242)		(2,242)		503,457		(55,069)	(55,069)		2,693	04/15/2011
616912-AA-9	7.802% 03/31/19 MORGAN STANLEY CAPITAL I 2005-T17 AAB		09/30/2009	Paydown		122,302	122,302	122,302	122,302						122,302					5,762	03/31/2019
61745M-W3-3	4.630% 12/13/41 MSDW MTGE CAPITAL OWNER TRUST 2000-F1 A2A (FRAN-144A) MBI A 7.700% 08/15/22		12/01/2009	Paydown		20,570	20,570	20,673	20,605		(35)		(35)		20,570					952	06/13/2014
61747B-AC-9	Morgan Stanley Capital I 2007-T27 A1		12/01/2009	Paydown		1,404,335	1,404,335	1,458,532	1,438,832		(34,497)		(34,497)		1,404,335					45,970	03/15/2015
61754J-AA-6	5.606% 06/11/42 MORGAN STANLEY CAPITAL I SERIES 2007-HQ12		12/01/2009	Paydown		2,915,952	2,915,952	2,923,229	2,919,585		(3,634)		(3,634)		2,915,952					94,448	03/11/2012
61755B-AA-2	CLASS A1 5.519% 04/12/49 NSG HOLDINGS LLC/NSG SERIES 144A 7.750%		12/01/2009	Paydown		484,100	484,100	471,828	474,219		9,881		9,881		484,100					14,697	04/12/2049
62940Q-AA-3	12/15/25 NSG HOLDINGS LLC/NSG SERIES 144A 7.750%		09/02/2009	Oppenheimer		422,500	500,000	500,000	500,000						500,000		(77,500)	(77,500)		28,309	12/15/2025
633072-AC-7	NATIONAL BANK CANADA NY 7.750% 11/01/09 NEW PLAN EXCEL REALTY TR NTS 7.400%		11/01/2009	Maturity		875,000	875,000	967,535	895,796		(20,796)		(20,796)		875,000					67,813	11/01/2009
64805E-AA-0	09/15/09 RUBBERMAID INC NTS 4.000% 05/01/10		04/08/2009	Tender Offer		3,245,700	3,490,000	3,970,583	3,554,649		(24,324)		(24,324)		3,530,325		(284,625)	(284,625)		145,630	09/15/2009
651229-AE-6	05/04/2009 RUBBERMAID INC NTS 4.000% 05/01/10		05/04/2009	Tender Offer		702,660	717,000	714,498	716,467		133		133		716,600		(13,940)	(13,940)		35,850	05/01/2010
651639-AH-9	02/25/2009 NEWMONT MINING CORP 1.250% 07/15/14		02/25/2009	Various		395,788	350,000	373,123	371,817		(579)		(579)		371,238		24,550	24,550		2,670	07/15/2014
651630-AA-6	01/05/2009 NEWMONT GOLD SER A1 8.910% 01/05/09		01/05/2009	Maturity		78,103	78,103	78,103	78,103						78,103					3,479	01/05/2009
65543A-AA-2	05/15/15 NORANDA ALUMINUM ACO SERIES 144A 4.524%		01/01/2009	Tax Free Exchange		11,373					5		5		5		11,368	11,368			01/05/2009
665772-BR-9	08/01/2009 NORTH STS PWR MINN UNSEC'D SR NTS 6.875% 08/01/09		08/01/2009	Maturity		6,000,000	6,000,000	6,040,000	6,004,335		(4,335)		(4,335)		6,000,000					412,500	08/01/2009
66586G-BU-0	08/01/09 NORTHERN TRUST CO SUB NTS 7.100%		08/01/2009	Maturity		3,550,000	3,550,000	4,042,623	3,600,012		(50,012)		(50,012)		3,550,000					252,050	08/01/2009
670768-AA-8	05/01/2009 NYNEX CORP DEBS 9.550% 05/01/10		05/01/2009	Redemption		51,720	51,720	51,720	51,720						51,720					2,470	05/01/2010
679574-AG-8	12/01/28 OLD DOMINION ELEC CO-OP NTS 6.210%		12/01/2009	Redemption		833,333	833,333	833,333	833,333						833,333					51,750	12/01/2028
682680-AC-7	02/01/2009 ONECK INC UNSEC'D DEBS 6.000% 02/01/09		02/01/2009	Maturity		1,500,000	1,500,000	1,617,015	1,502,238		(2,238)		(2,238)		1,500,000					45,000	02/01/2009
684181-AA-8	12/15/2009 ORANGE COGEN. FUND CORP SR SEC 144A		12/15/2009	Redemption		80,000	80,000	80,000	80,000						80,000					4,088	03/15/2022
693476-AL-7	02/15/2009 PNC FUNDING CORP SUB 6.125% 02/15/09		02/15/2009	Various		2,575,000	2,575,000	2,761,585	2,579,437		(4,437)		(4,437)		2,575,000					78,859	02/15/2009
693476-AP-8	11/01/09 PNC FUNDING CORP SUB NOTES 7.500%		11/01/2009	Maturity		1,030,000	1,030,000	1,147,682	1,046,545		(16,545)		(16,545)		1,030,000					77,250	11/01/2009
693659-AC-8	12/30/2015 PVNGS II FNDG CORP SLOB 8.000% 12/30/15		12/30/2009	Call	100.0000	890,000	890,000	889,252	889,591		38		38		889,629		371	371		69,243	12/30/2015
693927-AC-9	05/30/2009 PNPP FUNDING CORP CLB 9.120% 05/30/16		05/30/2009	Call	100.0000	206,000	206,000	206,000	206,000						206,000					9,394	05/30/2016
693927-AC-9	11/30/2009 PNPP FUNDING CORP CLB 9.120% 05/30/16		11/30/2009	Redemption	100.0000	230,000	230,000	230,000	230,000						230,000					20,976	05/30/2016
696680-00-8	01/15/2009 CAITHNESS LONG ISLAND Private Placement		01/15/2009	Tax Free Exchange		3,357,200	3,357,200	3,357,200	3,357,200						3,357,200					111,795	01/15/2032
696690-00-7	01/15/2009 CAITHNESS LONG ISLAND Private Placement		01/15/2009	Tax Free Exchange		1,356,444	1,356,444	1,356,444	1,356,444						1,356,444					45,170	01/15/2032
696970-00-3	12/21/2009 Old National Bank Private Placement		12/21/2009	Redemption	100.0000	606,310	606,310	606,310	606,310						606,310					21,105	09/19/2027
705220-AL-5	09/01/2009 PECO ENERGY TRANSITION TRUST SER 2000-A A4 (ABS-BULLETT) 7.650% 03/01/10		09/01/2009	Paydown		5,275,000	5,275,000	5,876,680	5,338,356		(63,356)		(63,356)		5,275,000					403,538	09/01/2009
709903-BB-3	11/15/2009 PENNZOIL CO DEB 10.125% 11/15/09		11/15/2009	Various		1,807,000	1,807,000	2,348,632	1,868,848		(61,848)		(61,848)		1,807,000					182,959	11/15/2009
713411-AB-2	02/17/2009 PEPSI BOTTLING HLDG INC. NTS (GUAR:PEPST)144A 5.625% 02/17/09		02/17/2009	Maturity		1,300,000	1,300,000	1,139,593	1,296,888		3,112		3,112		1,300,000					36,563	02/17/2009

E14.14

## ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company

**SCHEDULE D - PART 4**

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

1 CUSIP Identification	2 Description	3 Foreign	4 Disposal Date	5 Name of Purchaser	6 Number of Shares of Stock	7 Con- sideration	8 Par Value	9 Actual Cost	10 Prior Year Book/ Adjusted Carrying Value	Change In Book/Adjusted Carrying Value					16 Book/ Adjusted Carrying Value at Disposal Date	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Bond Interest/ Stock Dividends Received During Year	21 Maturity Date
										11 Unrealized Valuation Increase/ Decrease	12 Current Year's (Amor- tization)/ Accretion	13 Current Year's Other Than Temporary Impairment Recognized	14 Total Change in Book/ Adjusted Carrying Value (11+12-13)	15 Total Foreign Exchange Change in Book/ Adjusted Carrying Value						
716747-AA-8	PETROPOWER I FUNDING TRUST NT 144A 7.360% 02/15/14		08/15/2009	Redemption		33,167	33,167	33,167	33,167						33,167				1,844	02/15/2014
720180-AJ-0	PIEDMONT NATURAL GAS NTS SER D 6.550% 09/26/11		11/27/2009	BOLI-SA PNC/National City		111,381	110,000	115,467	112,006		(626)		(626)		111,381				7,725	09/26/2011
73768E-AL-2	POTOMAC ELECTRIC NTS MTN SER A 6.250% 01/20/09		01/20/2009	Maturity		10,000,000	10,000,000	10,128,900	10,001,243		(1,243)		(1,243)		10,000,000				293,403	01/20/2009
73922P-AA-4	POWER CONTRACT FINANCING III Series 144A 1.331% 02/05/10		09/23/2009	Morgan Stanley & Co., Inc.		1,470,000	1,500,000	1,191,630	1,385,171		77,132		77,132		1,462,303		7,697	7,697	20,394	02/05/2010
73932L-AA-1	POWER RECEIVABLES FINANC SR NTS 144A 6.290% 01/01/12		10/01/2009	Redemption		1,131,191	1,131,191	1,142,947	1,135,869		(545)		(545)		1,135,325		(4,134)	(4,134)	44,974	01/01/2012
742741-AA-9	PROCTER & GAMBLE ESOP DEB 9.360% 01/01/21		07/01/2009	Redemption		1,363,776	1,363,776	1,603,541	1,569,652		(3,922)		(3,922)		1,565,730		(201,953)	(201,953)	96,496	08/01/2020
74438Y-AA-0	PRUVIENT ENERGY GUAM LLC TAX MUNI (144A) 5.450% 09/01/11		09/01/2009	Redemption		1,130,000	1,130,000	1,127,175	1,128,811		515		515		1,129,326		674	674	61,585	09/01/2011
745867-AH-4	PULTE HOMES INC SR UNSEC'D CO GUARNTY 8.125% 03/01/11		07/08/2009	JP Morgan Securities, Inc.		21,250,000	21,250,000	21,356,250	22,514,360		(276,931)	882,589	(1,159,520)		21,354,841		(104,841)	(104,841)	1,496,354	03/01/2011
745867-AL-5	PULTE HOMES INC SR UNSEC'D 7.875% 08/01/11		07/08/2009	JP Morgan Securities, Inc.		5,000,000	5,000,000	5,012,500	5,397,146		(72,670)	311,976	(384,646)		5,012,500		(12,500)	(12,500)	374,063	08/01/2011
74837R-AE-4	QUICKSILVER RESOURCES IN BASIC 8.250% 08/01/15		08/27/2009	Citigroup Global Markets		1,222,000	1,300,000	1,282,515	1,283,619		1,348		1,348		1,284,967		(62,967)	(62,967)	126,317	08/01/2015
74913G-AG-0	QUEST CORP 7.500% 10/01/14 AEP GENERATING CO RGS FUNDING 9.810% 12/07/22		12/17/2009	Citigroup Global Markets		517,500	500,000	500,000	500,000						500,000		17,500	17,500	45,938	10/01/2014
74955D-AA-9	Redemption 100.0000		12/07/2009			7,047	7,047	7,091	7,080		(1)		(1)		7,079		(32)	(32)	464	12/07/2022
74955D-AB-7	Redemption 100.0000		12/07/2009			1,570	1,570	1,517	1,529		1		1		1,530		39	39	117	12/07/2022
74955E-AA-7	INDIANA-MICHIGAN PIWR CO RGS FUNDING 9.810% 12/07/22		12/07/2009	Redemption		2,261	2,261	2,261	2,261						2,261				149	12/07/2022
74955E-AB-5	INDIANA-MICHIGAN PIWR CO RGS FUNDING 9.820% 12/07/22		12/07/2009	Redemption		3,832	3,832	3,914	3,896		(2)		(2)		3,894		(62)	(62)	287	12/07/2022
74971X-AA-5	RELANT RESOURCES INC 6.750% 12/15/14 RALSTON PURINA DEBS 9.250% 10/15/09		09/02/2009	Various		1,000,000	1,000,000	996,250	997,513		216		216		997,728		2,272	2,272	44,878	12/15/2014
751277-AM-6	Range Resources 7.500% 05/15/16 RESIDENTIAL ACCREDIT LOANS INC 2003-QS22 A3		10/15/2009	Maturity		1,250,000	1,250,000	1,522,298	1,271,593		(21,593)		(21,593)		1,250,000				115,625	10/15/2009
75281A-AG-4	Various 1,189,938		08/26/2009	Various		1,205,000	1,205,000	1,205,000	1,205,000						1,205,000		(15,063)	(15,063)	71,798	05/15/2016
76110H-IX-4	RESIDENTIAL ACCREDIT LOANS INC 2003-QS22 A3 5.375% 12/26/33		12/01/2009	Paydown		805,200	805,200	801,928	801,970		3,230		3,230		805,200				24,145	12/26/2033
76110V-RC-4	RESIDENTIAL FUNDING MTG 2005-H11 A4 4.700% 08/25/34		12/01/2009	Paydown		333,652	333,652	329,572	331,470		2,181		2,181		333,652				8,334	08/25/2034
785583-AC-9	SABINE PASS LNG BASIC 7.250% 11/30/13		11/03/2009	Credit Suisse First Boston JP Morgan Securities, Inc.		669,375	750,000	669,375	750,000		1,673	80,625	(78,952)		671,048		(1,673)	(1,673)	50,750	11/30/2013
79377W-AG-3	SAKS INC NOTES 9.875% 10/01/11 SALLY HOLDINGS LLC BASIC 9.250% 11/15/14		11/04/2009	Inc. Pershing/CJS Securities		2,020,000	2,000,000	1,752,500	1,901,452		27,336		27,336		1,928,788		91,212	91,212	218,347	10/01/2011
79546V-AC-0	SALTON SEA FUNDING CORP SER F 7.475% 11/30/18		05/14/2009	Redemption		466,163	465,000	465,000	465,000						465,000		1,163	1,163	21,984	11/15/2014
795770-AN-6	SAN PASQUAL CASINO Series 144A 8.000% 09/15/13		11/30/2009	Redemption		19,394	19,394	19,493	19,472		(3)		(3)		19,469		(75)	(75)	1,087	11/30/2018
799183-AA-6	SANDRIDGE ENERGY INC 144A 8.000% 06/01/18		08/26/2009	Jefferies & Co., Inc.		622,375	650,000	650,000	650,000						650,000		(27,625)	(27,625)	49,978	09/15/2013
80007P-AC-3	Barclays Capital, Inc. Deutsche Bank Securities, Inc.		11/04/2009			595,925	605,000	605,000	605,000						605,000		(9,075)	(9,075)	45,442	06/01/2018
800907-AJ-6	SANMINA-SCI CORP 6.750% 03/01/13 SELKIRK COGEN FUNDING CORP FMB 8.980% 06/26/12		08/28/2009	Redemption		667,950	730,000	565,750	730,799		1,190	164,877	(163,687)		567,112		100,838	100,838	49,412	03/01/2013
816391-AD-8	Sheridan Acquisition Crp 10.250% 08/15/11 Shingle Springs Tribal Gaming Series 144A 9.375% 06/15/15		12/26/2009	Redemption		1,934,132	1,934,132	1,934,132	1,934,132						1,934,132				128,276	06/26/2012
823777-AE-7	Shingle Springs Tribal Gaming Series 144A 9.375% 06/15/15		11/06/2009	Wachovia Bank of Georgia		360,500	400,000	436,000	405,811		(5,811)		(5,811)		400,000		(39,500)	(39,500)	50,908	08/15/2011
82459A-AA-9	SHURGARD STORAGE CENTERS A UNSEC'D NTS 7.750% 02/22/11		12/09/2009	Various		448,675	615,000	442,800	615,000		2,557	172,200	(169,643)		445,357		3,318	3,318	53,121	06/15/2015
82567D-AE-4	Direct 2,250,000		02/12/2009			2,250,000	2,250,000	2,249,416	2,249,933		3		3		2,249,936		64	64	82,344	02/22/2011

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

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/Decrease	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Maturity Date
826428-AN-4	SIERRA PACIFIC RESOURCES 6.750% 08/15/17		09/03/2009	Deutsche Bank Securities, Inc.		1,146,000	1,200,000	1,211,422	1,207,907		(1,035)		(1,035)		1,206,871		(60,871)	(60,871)	86,400	08/15/2017
837004-BJ-8	SC ELEC & GAS CO 1st MTG BONDS 6.125% 03/01/09		03/01/2009	Maturity		4,000,000	4,000,000	3,953,520	3,998,680		1,320		1,320		4,000,000				122,500	03/01/2009
84263P-AB-6	SOUTHERN CONN GAS MTN 144A 7.950% 08/03/26		02/26/2009	Tax Free Exchange Redemption		8,700,000	8,700,000	8,700,000	8,700,000						8,700,000				366,959	08/03/2026
844741-AG-3	SOUTHWEST AIR PTC 1993-B 6.260% 09/24/12		09/24/2009			88,493	88,493	86,766	88,067		150		150		88,217		276	276	5,540	09/24/2012
845743-BF-9	SW PUBLIC SERV CO UNSEC'D SR NTS SER A 6.200% 03/01/09		03/01/2009	Maturity		5,000,000	5,000,000	4,950,000	4,998,421		1,579		1,579		5,000,000				155,000	03/01/2009
870836-AD-5	SWISS BANK CORP NY SUB DEBS 7.000% 10/15/15		11/27/2009	BOLI-SA PNC/National City		1,594,364	1,500,000	1,618,800	1,606,281		(11,917)		(11,917)		1,594,364				117,250	10/15/2015
870845-AC-8	SWISS BANK CORP-NY SUB DEBS 7.750% 09/01/26		11/27/2009	BOLI-SA PNC/National City		457,163	400,000	460,600	458,859		(1,696)		(1,696)		457,163				38,406	09/01/2026
871928-AX-5	TIERS CORP BND BKD CTF-AGC 144A 8.125% 09/15/17		09/15/2009	Various		918,513	918,513	948,464	937,626		(1,107)		(1,107)		936,518		(18,006)	(18,006)	56,343	09/15/2017
872384-AC-6	TEPCO PARTNERS - LP 7.000% 06/01/67		10/27/2009	Tax Free Exchange		3,829,017	3,835,000	3,828,826	3,829,011		6		6		3,829,017				243,096	06/01/2067
87255M-AA-8	TL ACQUISITIONS INC SERIES 144A 10.500% 01/15/15		09/02/2009	JP Morgan Securities, Inc.		678,750	750,000	740,430	741,827		694		694		742,521		(63,771)	(63,771)	90,344	01/15/2015
87612E-AJ-5	TARGET CORP NTS 5.375% 06/15/09		06/15/2009	Maturity		4,500,000	4,500,000	4,496,310	4,499,722		278		278		4,500,000				120,938	06/15/2009
88031R-AA-6	TENASKA ALABAMA II PART SR SEC'D BONDS 144A 6.125% 03/30/23		12/30/2009	Various		43,924	43,924	43,924	43,924						43,924				1,682	03/30/2023
880394-AD-3	TENNECO PACKAGING DEBS 8.125% 06/15/17		11/27/2009	City		2,291,823	1,958,000	2,433,598	2,323,602		(31,779)		(31,779)		2,291,823				151,133	06/15/2017
883199-AQ-4	TEXTRON FIN CORP NTS 6.000% 11/20/09		10/13/2009	Tender Offer		17,018,750	17,500,000	17,892,875	17,558,972		(52,016)		(52,016)		17,506,956		(488,206)	(488,206)	1,467,083	11/20/2009
883203-BJ-9	TEXTRON INC SR UNSEC'D NTS 4.500% 08/01/10		09/22/2009	Tender Offer		1,017,500	1,000,000	972,060	991,955		3,610		3,610		995,565		21,935	21,935	51,375	08/01/2010
88576P-AB-9	HENDERSON RECEIVABLES I LLC SER 2003-A (ABS-144A) MBIA 4.855% 11/15/33		12/15/2009	Paydown		787,558	787,558	787,518	787,530		28		28		787,558				18,779	11/15/2033
88633P-AA-2	TICKETMASTER ONLINE-CITY - B 144A 10.750% 07/28/16		07/29/2009	Tax Free Exchange		1,260,000	1,260,000	1,260,000	1,260,000						1,260,000				203,551	07/28/2016
88830M-AD-4	TITAN INTL INC 8.000% 01/15/12		09/11/2009	Credit Suisse First Boston		422,400	440,000	443,361	442,388		(510)		(510)		441,878		(19,478)	(19,478)	41,164	01/15/2012
88947E-AC-4	TOLL BROTHERS INC NTS 5.950% 09/15/13		12/18/2009	Various		5,473,393	5,430,000	5,395,465	5,411,351		3,257		3,257		5,414,609		58,784	58,784	393,682	09/15/2013
89566E-AA-6	TRISTATE GEN/TRANS ASSN BONDS 144A 6.040% 01/31/18		01/31/2009	Various		946,487	946,487	988,890	973,555		(292)		(292)		973,263		(26,776)	(26,776)	28,584	01/31/2018
89652P-AA-6	TRINITY INDUSTRIES LE PTC 144A 7.755% 02/15/09		02/15/2009	Redemption		3,634,458	3,634,458	3,634,458	3,634,458						3,634,458				140,926	02/15/2009
897053-AB-0	TRONOX WORLDWIDE /FINANCE 9.500% 12/01/12		06/04/2009	Goldman Sachs & Co. Credit Suisse First		222,300	1,235,000	123,500	123,500	101	(101)				123,500		98,800	98,800	(58,663)	12/01/2012
89816W-AA-4	TRUMP ENTERTAINMENT RES 8.500% 06/01/15		10/15/2009	Boston		35,000	500,000	40,000	66,250	19	(19)	26,250	(26,250)		40,000		(5,000)	(5,000)	(21,250)	06/01/2015
902973-AT-3	U.S. BANCORP 0.000% 02/06/37		02/09/2009	Direct		1,950,000	1,950,000	1,906,135	1,906,759		255		255		1,907,015		42,985	42,985	4,765	02/06/2037
903290-AD-6	U S F & G CORP Zero CPN 0.000% 03/03/09		03/03/2009	Maturity		200,000	200,000	176,438	198,492		1,508		1,508		200,000					03/03/2009
90333L-AB-8	UMBRELLA ACQUISITION Series 144A 9.750% 04/01/14		10/27/2009	Pali Partners		451,750	650,000	422,500	640,531		5,220	222,206	(216,986)		423,545		28,205	28,205	58,823	04/01/2014
904201-AA-8	UNION PACIFIC CORP 7.375% 09/15/09		12/01/2009	JP Morgan Securities, Inc.		1,176,621	1,500,000	150,000	187,578		13,745		13,745		201,323		975,298	975,298	182,754	03/15/2015
907818-CG-1	UNION PACIFIC CORP 7.375% 09/15/09		09/15/2009	Maturity		4,680,000	4,680,000	4,971,892	4,743,570		(63,570)		(63,570)		4,680,000				345,150	09/15/2009
908584-DE-2	UNION TANK CAR CO DEBS 8.625% 07/02/13		01/02/2009	Redemption		379	379	379	379						379				16	07/02/2013
908584-DK-8	UNION TANK CAR CO UNSEC'D NTS 7.450% 06/01/09		06/01/2009	Various		3,010,000	3,010,000	3,389,382	3,038,088		(28,088)		(28,088)		3,010,000				112,123	06/01/2009
909205-AB-2	Unisource Energy Corp 4.500% 03/01/35		09/17/2009	Various		410,156	450,000	464,944	455,601		(2,915)		(2,915)		452,686		(42,530)	(42,530)	20,250	03/01/2035
91359P-AF-7	UNIVERSAL HOSPITAL SERV BASIC 8.500% 06/01/15		08/25/2009	Banc of America Securities		616,000	640,000	640,000	640,000						640,000		(24,000)	(24,000)	40,347	06/01/2015
918436-AD-8	VWR Funding Inc Series B 10.250% 07/15/15		09/02/2009	Jefferies & Co., Inc.		433,750	500,000	500,000	500,000						500,000		(66,250)	(66,250)	51,250	07/15/2015
92336G-AB-2	VERASUN ENERGY 9.875% 12/15/12		04/21/2009	Direct		742,355	720,000	432,000	432,000						432,000		310,355	310,355	35,550	12/15/2012

E14.16

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/Decrease	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Maturity Date
923366-AF-3	VERASUN ENERGY BASIC 9.375% 06/01/17		06/04/2009	JP Morgan Securities, Inc.		51,750	690,000	34,500	82,800			48,300	(48,300)		34,500		17,250	17,250	(32,344)	06/01/2017
92344S-AH-3	VERIZON WIRELESS 144A 7.375% 11/15/13		11/15/2009	Tax Free Exchange		14,898,159	15,000,000	14,877,750	14,880,018		18,141		18,141		14,898,159				1,087,813	11/15/2013
925524-AJ-9	CBS CORP UNSEC'D SR NTS 7.700% 07/30/10		05/18/2009	Tender Offer		6,846,525	6,615,000	7,726,555	6,879,024		(61,343)		(61,343)		6,817,681		28,844	28,844	407,484	07/30/2010
925524-AZ-3	CBS CORP 5.750% 04/30/11		08/31/2009	Tender Offer		5,306,250	5,000,000	4,990,050	4,994,660		1,451		1,451		4,996,111		310,139	310,139	239,583	04/30/2011
931142-BE-2	WAL-MART STORES INC SR NOTES 6.875%		08/10/09	Maturity		1,000,000	1,000,000	961,930	996,688		3,312		3,312		1,000,000				68,750	08/10/2009
93114K-AC-7	WAL-MART STORES P/T TRUSTS SER 94-A1 8.570% 01/02/10		07/02/2009	Redemption		100,000	167,726	171,136	168,477		(92)		(92)		168,385		(659)	(659)	8,949	01/02/2010
93443M-AC-5	WARNER CHLCO TT 8.750% 02/01/15		09/03/2009	Various		1,947,689	1,949,000	1,944,969	1,941,894		(956)		(956)		1,940,938		6,751	6,751	188,101	02/01/2015
94106L-AE-9	WASTE MANAGEMENT INC SR UNSEC'D 6.875%		05/15/09	Maturity		10,486,000	10,486,000	11,496,570	10,560,283		(74,283)		(74,283)		10,486,000				360,456	05/15/2009
948741-AD-5	WEINGARTEN REALTY INVST UNSEC'D NTS 7.000% 07/15/11		06/10/2009	Tender Offer		3,000,000	3,000,000	3,495,660	3,188,258		(31,313)		(31,313)		3,156,945		(156,945)	(156,945)	189,583	07/15/2011
949761-AC-4	WELLS FARGO MBS TRUST SER 2003-11 1A3 (PAC-SUB) 4.750% 10/25/18		12/01/2009	Paydown		6,100,265	6,100,265	6,157,455	6,096,981		3,284		3,284		6,100,265				154,696	09/25/2010
94984H-AA-3	Wells Fargo Series 2006-12 A1 6.000%		10/25/36	Paydown		3,442,805	3,442,805	3,461,719	3,446,130		(3,325)		(3,325)		3,442,805				107,094	02/25/2011
960080-AF-6	WESTFED HOLDINGS INC NEW 18.000% 09/15/99		11/30/2009	Redemption		0,000	1,782,150													09/15/1999
961548-AS-3	WESTVACO CORP DEB 7.500% 06/15/27		06/15/2009	Redemption		725,000	725,000	768,718	752,095		(1,063)		(1,063)		751,032		(26,032)	(26,032)	27,188	06/15/2027
96950H-AD-2	WILLIAMS PARTNERS LP/WIL 7.250% 02/01/17		09/02/2009	Jefferies & Co., Inc.		731,250	750,000	750,000	750,000						750,000		(18,750)	(18,750)	59,964	02/01/2017
973735-AY-9	WINDSOR PETRO TRANS SEC NOTE 144A 7.840%		07/15/2009	Redemption		28,440	28,440	23,718	24,689		92		92		24,781		3,659	3,659	2,230	01/15/2021
97381W-AC-8	WINDSTREAM CORP BASIC 8.125% 08/01/13		08/25/2009	Banc of America Securities		3,015,000	3,000,000	3,033,750	3,027,250		(3,342)		(3,342)		3,023,908		(8,908)	(8,908)	262,031	08/01/2013
983024-AD-2	WYETH 0.465% 01/15/24		07/15/2009	Various		3,247,875	3,250,000	3,355,434	3,285,601		(24,555)		(24,555)		3,261,046		(13,171)	(13,171)	55,749	01/15/2024
985577-AB-1	YRC WORLDWIDE INC BASIC 3.375% 11/25/23		04/07/2009	JP Morgan Securities, Inc.		119,438	525,000	288,188	139,125	290,304	1,246	140,137	151,413		290,538		(171,101)	(171,101)	6,792	11/25/2023
LN2269-09-7	Acco Brands corp Bak Loans		12/31/2009	Various															6	08/17/2012
LN2406-68-1	Georgia Pacific 1.026% 12/20/12		09/24/2009	Barclays Capital, Inc.		1,381,199	1,431,294	1,148,513	1,151,969		53,234		53,234		1,205,204		175,995	175,995	31,322	12/20/2012
LN2406-68-1	Georgia Pacific 1.026% 12/20/12		09/30/2009	Redemption		100,000	368,706	368,706	313,987		5,456		5,456		320,914		47,792	47,792	3,670	12/20/2012
LN2430-43-4	BL PANAMSAT 2.914% 01/03/14		06/10/2009	Morgan Stanley & Co., Inc.		409,105	439,898	362,916	364,300		10,398		10,398		374,697		34,408	34,408	6,686	01/03/2014
LN2430-43-4	BL PANAMSAT 2.914% 01/03/14		01/08/2009	Redemption		100,000	5,102	5,102	4,225		(4,982)		(4,982)		4,228		874	874	3,317	01/03/2014
LN2460-23-3	HERTZ CORP HERTZ CORP 1.812% 12/21/12		10/07/2009	Morgan Stanley & Co., Inc.		645,512	694,099	506,692	511,932		34,745		34,745		546,677		98,835	98,835	7,150	12/21/2012
LN2460-23-3	HERTZ CORP HERTZ CORP 1.812% 12/21/12		09/30/2009	Redemption		100,000	5,901	5,901	4,308		164		164		4,516		1,385	1,385	266	12/21/2012
LN2510-91-2	AMC ENTERTAINMENT INC 0.258% 01/26/13		05/22/2009	Barclays Capital, Inc.		1,550,548	1,689,971	1,390,001	1,397,276		27,475		27,475		1,424,751		125,797	125,797	14,131	01/26/2013
LN2510-91-2	AMC ENTERTAINMENT INC 0.258% 01/26/13		06/30/2009	Redemption		100,000	5,659	5,659	4,654		108		108		4,787		872	872	4,786	01/26/2013
LN2617-04-8	CABLEVISION TLB BANK LOAN 2.095%		06/04/2009	Barclays Capital, Inc.		935,179	994,872	828,231	830,360		15,321		15,321		845,681		89,499	89,499	9,808	03/30/2013
LN2617-04-8	CABLEVISION TLB BANK LOAN 2.095%		03/30/13	Redemption		100,000	5,128	5,128	4,269		23		23		4,303		825	825	125	03/30/2013
LN2683-18-0	Kansas City Southern Railway Kansas City Southern Railway 2.039% 04/28/13		12/31/2009	Redemption		100,000	10,230	8,504	8,570		207		207		8,777		1,454	1,454	142	04/28/2013
LN2771-94-4	BL TRANSDIGM BANK LOAN 4.855% 06/23/13		09/22/2009	Various		1,753,625	1,800,000	1,332,000	1,336,859		77,489		77,489		1,414,347		339,278	339,278	38,999	06/23/2013
LN2813-80-3	REXNORD CORP TLB1 BANK LOAN 6.003%		07/19/13	Banc of America Securities		695,625	750,000	532,500	534,136		42,893		42,893		577,028		118,597	118,597	17,124	07/19/2013
LN2958-09-5	ARAMARK COPR 1.629% 01/26/14		05/14/2009	Deutsche Bank Securities, Inc.		1,845,000	2,000,000	1,700,000	1,706,414		20,184		20,184		1,726,598		118,402	118,402	18,922	01/26/2014
LN2999-69-3	Sally Beauty SALLY BEAUTY TERM LOAN B 0.074% 11/16/13		12/03/2009	Various		902,839	957,767	797,341	800,638		29,249		29,249		829,888		72,951	72,951	23,694	11/16/2013

E14.17



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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
LN2999-69-3	Sally Beauty SALLY BEAUTY TERM LOAN B 0.074% 11/16/13		09/30/2009	Redemption 100.0000		39,682	39,682	33,035	33,171		1,012		1,012		34,184		5,498	5,498	1,535	11/16/2013
LN3048-84-7	TALECRIS BIOTHERAPEUTICS IN TALECRIS BIOTHERAPEUTICS IN 3.960% 12/06/13		09/01/2009	Morgan Stanley & Co., Inc.		1,416,797	1,462,500	1,380,234	1,383,308		10,343		10,343		1,393,651		23,146	23,146	54,538	12/06/2013
LN3048-84-7	TALECRIS BIOTHERAPEUTICS IN TALECRIS BIOTHERAPEUTICS IN 3.960% 12/06/13		06/30/2009	Redemption 100.0000		7,500	7,500	7,078	7,094		29		29		7,123		377	377	3,529	12/06/2013
LN3098-57-8	HUDSON PRODUCTS Bank Loan 7.980% 08/24/15		12/31/2009	Redemption 100.0000		9,300	9,300	9,021	9,033		18		18		9,051		249	249	471	08/24/2015
LN3204-58-0	BL METRO PCS TLB BL METRO PCS TLB 3.301% 11/03/13		06/08/2009	Various		1,896,421	2,000,000	1,673,750	1,680,972		43,371		43,371		1,724,343		172,077	172,077	35,286	11/03/2013
LN3230-10-6	SUNGARD DATA SYSTEMS INC SUNGARD DATA SYSTEMS INC 3.897% 02/28/14		12/08/2009	JP Morgan Securities, Inc.		2,384,307	2,468,233	1,865,562	1,874,813		109,653		109,653		1,984,466		399,841	399,841	63,221	02/28/2014
LN3230-10-6	SUNGARD DATA SYSTEMS INC SUNGARD DATA SYSTEMS INC 3.897% 02/28/14		12/31/2009	Redemption 100.0000		31,767	31,767	24,438	24,577		811		811		25,388		6,379	6,379	330	02/28/2014
LN3288-53-4	Catalent PTS Acquisition Bank Loan 2.481% 04/10/14		12/31/2009	Redemption 100.0000		31,889	31,889	29,727	30,057		151		151		30,208		1,681	1,681	611	04/10/2014
LN3291-93-4	HCA Inc HCA INC 2.533% 11/18/13		11/04/2009	Various		1,304,986	1,384,809	1,140,642	1,145,898		29,720		29,720		1,175,617		129,369	129,369	34,736	11/18/2013
LN3291-93-4	HCA Inc HCA INC 2.533% 11/18/13		08/13/2009	Redemption 100.0000		610,102	610,102	506,385	508,958		7,249		7,249		516,206		93,896	93,896	9,754	11/18/2013
LN3391-63-5	NRG ENERGY 1.996% 02/01/13		09/24/2009	Various		1,722,834	1,816,154	1,674,128	1,676,719		21,210		21,210		1,697,929		24,905	24,905	34,223	02/01/2013
LN3391-63-5	NRG ENERGY 1.996% 02/01/13		12/31/2009	Redemption 100.0000		246,214	246,214	234,375	234,621		580		580		235,200		11,014	11,014	1,552	02/01/2013
LN3391-67-6	NRG ENERGY 0.151% 02/02/11		09/24/2009	Various		923,299	973,287	897,579	901,362		21,287		21,287		922,649		649	649	14,816	02/02/2011
LN3411-40-9	BLCOMMUNITYHLTH PRIVATE PLACEMENT 3.025% 07/06/14		01/01/2009	Various							(6,177)		(6,177)						5,314	07/25/2014
LN3416-15-0	AMWINS 2.757% 06/11/13		12/31/2009	Redemption 100.0000		2,513	2,513	1,809	1,892		124		124		2,016		496	496	58	06/11/2013
LN3452-87-4	Novelis Strip BL NOVELUS STRIP 0.044% 07/06/14		12/31/2009	Redemption 100.0000		14,501	14,501	10,513	10,582		430		430		11,012		3,489	3,489	244	07/06/2014
LN3457-28-7	NIAGRA BANK 9.250% 06/29/14		12/31/2009	Redemption 100.0000		13,500	13,500	10,395	13,500		14	3,105	(3,091)		10,409		3,091	3,091	407	06/29/2014
LN3469-17-5	DOLLAR GENERAL CORP Dollar General Corp 3.025% 07/06/14		11/04/2009	Citigroup Global Markets		1,934,112	1,994,560	1,576,138	1,579,859		46,582		46,582		1,626,441		307,671	307,671	54,561	07/06/2014
LN3469-17-5	DOLLAR GENERAL CORP Dollar General Corp 3.025% 07/06/14		09/30/2009	Redemption 100.0000		5,440	5,440	4,162	4,162		136		136		4,297		1,143	1,143	782	07/06/2014
LN3486-82-3	New World Gaming 2.787% 07/16/14		09/30/2009	Redemption 100.0000		1,788	1,788	1,788	1,788						1,788				56	07/16/2014
LN3486-86-4	New World Gaming 2.787% 07/16/14		09/30/2009	Redemption 100.0000		13,411	13,411	13,411	13,411						13,411				355	07/16/2014
LN3532-96-4	AEROFLEX INC 3.562% 08/15/14		10/07/2009	Redemption 100.0000		11,305	11,305	10,189	10,221		120		120		10,341		964	964	375	08/15/2014
LN3633-92-9	CATALINA MKTG Bank Loans 2.987% 10/11/14		11/03/2009	RBS Greenwich Capital		414,372	440,821	335,024	336,806		18,446		18,446		355,252		59,120	59,120	12,428	10/11/2014
LN3633-92-9	CATALINA MKTG Bank Loans 2.987% 10/11/14		12/21/2009	Redemption 100.0000		4,090	4,090	3,108	3,125		184		184		3,309		781	781	144	10/11/2014
LN3634-69-5	Energy Future Holdings 3.735% 10/10/14		12/31/2009	Redemption 100.0000		30,630	30,630	25,635	25,727		370		370		26,097		4,533	4,533	621	10/10/2014
LN3640-09-8	MYLAN LABORATORIES INC 3.870% 12/02/14		09/22/2009	JP Morgan Securities, Inc.		1,715,214	1,759,194	1,488,887	1,490,813		40,210		40,210		1,531,022		184,192	184,192	44,142	12/02/2014
LN3640-09-8	MYLAN LABORATORIES INC 3.870% 12/02/14		03/31/2009	Redemption 100.0000		40,806	40,806	36,113	36,190		136		136		36,325		4,481	4,481	394	12/02/2014
LN3667-42-2	URS Corp TLB 2.817% 05/01/13		08/26/2009	Morgan Stanley & Co., Inc.		861,664	871,143	866,689	867,277		(138)		(138)		867,139		(5,475)	(5,475)	33,998	05/01/2013
LN3667-42-2	URS Corp TLB 2.817% 05/01/13		06/17/2009	Redemption 100.0000		123,292	123,292	122,662	122,745		(134)		(134)		122,611		681	681	3,073	05/01/2013
LN3671-76-2	ALLTELL COMMUNICATIONS INC 2.538% 05/15/15		01/09/2009	Redemption 100.0000		997,475	997,475	957,576	958,332		121		121		958,454		39,021	39,021	2,845	05/15/2015
45957@-AD-8	INTERNATIONAL GROUP 5.240% 10/29/11		11/01/2009	Redemption 100.0000		600,000	600,000	600,000	600,000						600,000				31,440	10/29/2011

E14.18

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/Decrease	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Maturity Date
PP3907-Y2-0	Centennial BI CENTENNIAL CEL TL 3.579%		02/09/11	Credit Suisse First Boston		1,492,500	1,500,000	1,400,100	1,403,236		15,130		15,130		1,418,366		74,134	74,134	18,395	02/09/2011
PP3A06-76-0	CAIT LONG PRIVATE PLACEMENT 5.900%		01/15/32	Tax Free Exchange		947,089	947,089	947,089	947,089						947,089				27,939	01/15/2032
73664#-AA-8	PORTLAND GAS SEC'D SR NTS 5.900%		12/31/18	100.0000		506,618	506,618	506,618	506,618						506,618				18,682	12/31/2018
83787#-AA-9	SO FT MEADE LP (GUAR: CARGILL INC.) 6.920%		12/15/10	Redemption		749,368	749,368	749,368	749,368						749,368				32,672	12/15/2010
00111#-AA-2	AES HAWAII PRVT PLACEMENT 6.870%		06/30/22	100.0000		376,000	376,000	376,000	376,000						376,000				16,316	06/30/2022
PP6A04-JG-7	VYTIMNS 1991-1-F TRUST CERTS 40.160%		05/03/10	Redemption		482,599	482,599	507,212	490,327		(1,666)		(1,666)		488,662		(6,062)	(6,062)	102,454	05/03/2010
40453*-AA-6	HACKENSACK MED PL LLC SR SEC NTS (MBIA) 7.950%		06/01/28	Redemption		193,870	193,870	142,934	143,605		640		640		144,245		49,624	49,624	8,450	06/01/2028
PP6K1H-QW-2	CAIT LONG PRIVATE PLACEMENT 5.640%		01/15/32	Tax Free Exchange		1,199,000	1,199,000	1,199,000	1,199,000						1,199,000				31,584	01/15/2032
PP8J02-HU-1	CAITHNS 70810 PRIVATE PLACEMENT 3.950%		01/15/32	Tax Free Exchange		334,267	334,267	334,267	334,267						334,267				5,499	01/15/2032
PP8J03-0E-3	CAITHNS.95 PRIVATE PLACEMENT 8.500%		01/15/32	Tax Free Exchange		2,259,933	2,259,933	2,259,933	2,259,933						2,259,933				3,719	01/15/2032
003924-AD-9	ABITIBI CONSOLIDATED INC DEB 8.500%	A.	08/01/29	Barclays Capital, Inc		1,100,000	10,000,000	700,000	700,452		14,023		14,023		714,475		385,525	385,525	425,000	08/01/2029
01877K-AD-5	ALLIANCE PIPELINE LP BONDS (144A) 4.591%	I.	12/31/25	Redemption		293,597	293,597	293,597	293,597						293,597				10,109	12/31/2025
034918-AC-6	ANGIOTECH PHARMACEUTICAL 7.750%	I.	04/01/14	Various		873,650	2,115,000	454,725	454,725	234	29,694		29,928		484,654		388,996	388,996	96,607	04/01/2014
13645R-AC-8	CANADIAN PACIFIC RR NTS 6.250%	A.	10/15/11	Tender Offer		1,668,300	1,660,000	1,842,301	1,727,521		(10,194)		(10,194)		1,717,327		(49,027)	(49,027)	118,102	10/15/2011
30217V-AC-1	EXPRESS PIPELINE LP SUB NTS 144A SER B 7.390%	A.	12/31/19	Various		492,000	492,000	523,754	511,478		(2,347)		(2,347)		509,131		(17,131)	(17,131)	28,525	12/31/2017
71644E-AB-8	PETRO-CANADA DEBS 9.250%	A.	10/15/21	BOLI-SA PNC/National City		1,206,185	1,000,000	1,226,620	1,216,212		(10,028)		(10,028)		1,206,185				103,292	10/15/2021
7481F1-AC-0	QUEBECOR WORLD INC NOTES 4.875%	A.	11/15/08	Tax Free Exchange		220,000	8,000,000	220,000	220,000						220,000					11/15/2008
87971M-AC-7	TELUS CORPORATION NTS 8.000%	A.	06/01/11	Redemption		1,648,340	1,502,000	1,745,594	1,595,285		(37,134)		(37,134)		1,558,150		90,189	90,189	130,173	06/01/2011
884903-AS-4	THOMSON CORPORATION 4.250%	A.	08/15/09	Maturity		1,000,000	1,000,000	960,920	992,103		7,897		7,897		1,000,000				42,500	08/15/2009
LN2572-27-6	STRATOS GLOBAL Bank Loan 2.751%	A.	02/13/12	Redemption		7,576	7,576	7,481	7,507		1		1		7,508		67	67		02/13/2012
LN3627-44-2	Telesat Canada Inc. 3.240%	A.	10/23/14	Redemption		8,385	8,385	8,217	8,288		(29)		(29)		8,259		126	126	281	10/23/2014
LN3627-48-3	Telesat Canada Inc. 3.240%	A.	10/23/14	Redemption		717	717	702	723		(14)		(14)		710		7	7	18	10/23/2014
10553H-AE-2	BRASKEM SA 144A 11.750%	F.	01/22/14	SANTANDER CAPITAL		1,205,000	1,000,000	1,145,000	1,097,275		(10,505)		(10,505)		1,086,771		118,229	118,229	130,556	01/22/2014
111013-AB-4	BRITISH SKY BROADCASTING NTS 6.875%	F.	02/23/09	Maturity		2,000,000	2,000,000	2,254,660	2,007,864		(7,864)		(7,864)		2,000,000				68,750	02/23/2009
111013-AD-0	BRITISH SKY BROADCASTING CO GTY UNSEC'D 8.200%	F.	07/15/09	Maturity		9,110,000	9,110,000	10,956,062	9,315,140		(205,140)		(205,140)		9,110,000				747,020	07/15/2009
143658-AV-4	CARNIVAL CORP 0.500%	F.	04/29/33	Various		889,344	1,375,000	940,244	898,172		5,026		5,026		903,197		(13,854)	(13,854)	3,453	04/29/2033
143658-AV-4	CARNIVAL CORP 0.500%	F.	04/29/33	Call	66.4010	813,412	1,225,000	790,307	800,168		9,244		9,244		809,412		4,000	4,000	6,125	04/29/2033
15114V-AA-0	CELL C PTY LTD 144A 11.000%	F.	07/01/15	Various		249,150	260,000	239,850	243,564		878		878		244,442		4,708	4,708	28,854	07/01/2015
20444P-AA-4	COMP DE DESAROLLO AEROPU SR NOTES 144A 10.190%	F.	05/31/11	Redemption		55,000	55,000	39,342	49,076		1,613		1,613		50,689		4,311	4,311	4,203	05/31/2011
25380C-AA-7	Digicel Limited 144A 9.250%	F.	09/01/12	Banc of America Securities		1,827,175	1,855,000	1,919,091	1,890,554		(8,003)		(8,003)		1,882,551		(55,376)	(55,376)	170,158	09/01/2012
33938E-AL-1	FLEXTRONICS INTL LTD BASIC 1.000%	F.	08/01/10	Goldman Sachs & Co.		263,625	285,000	220,519	226,131		10,828		10,828		236,958		26,667	26,667	2,106	08/01/2010
434808-AA-9	HOLDEN FUNDING CORP SEC GTD AMORT NTS 144A (AMBAC) 7.345%	F.	11/01/35	Redemption		51,115	51,115	50,516	50,619		16		16		50,635		480	480	2,833	11/01/2035
45763U-AC-9	Inmarsat Finance II PLC 10.375%	F.	11/15/12	Various		1,551,250	1,500,000	1,278,750	1,594,874		(9,945)		(9,945)		1,584,929		(33,679)	(33,679)	92,943	11/15/2012

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21
										11	12	13	14	15						
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date
458182-BS-0	INTER AMERICAN DEVELOPMENT BNK DEBS																			
45867X-AE-4	8.400% 09/01/09	F	09/01/2009	Maturity		2,000,000	2,000,000	1,991,400	1,999,438		562		562		2,000,000				168,000	09/01/2009
48282A-AB-1	INTERGEN NV Series 144A 9.000% 06/30/17	F	09/02/2009	Barclays Capital, Inc.		2,352,000	2,400,000	2,380,536	2,382,090		1,002		1,002		2,383,092		(31,092)	(31,092)	148,800	06/30/2017
485161-AD-5	KABEL DEUTSCHLAND GMBH 10.625% 07/01/14	F	08/28/2009	Various		1,536,150	1,470,000	1,531,776	1,512,229		(7,089)		(7,089)		1,505,140		31,010	31,010	182,653	07/01/2014
592664-AA-4	KANSAS CITY SOUTHERN MEX 7.625% 12/01/13	F	12/01/2009	Banc of America Securities		1,165,125	1,195,000	1,197,840	1,197,379		(500)		(500)		1,196,879		(31,754)	(31,754)	91,878	12/01/2013
679480-00-4	METROPOLITANO DE LISBOA Series 144A 7.420% 10/15/16	F	10/15/2009	Redemption		200,000	200,000	200,000	200,000						200,000				11,130	10/15/2016
686200-00-7	Cemex Espana Finance 5.620% 06/13/15	F	09/01/2009	Various		23,000,000	23,000,000	23,000,000	23,000,000						23,000,000				926,363	06/13/2015
686870-00-7	Singet Group PLC 8.110% 05/23/16	F	03/17/2009	Redemption		3,682,000	3,682,000	3,682,000	3,682,000						3,682,000				19,493	05/23/2016
689380-00-5	ROULARTA MEDIA GROUP 7.180% 04/26/14	F	09/04/2009	100.0000		943,934	943,934	943,934	943,934						943,934				40,121	04/26/2014
706448-BC-0	CEMENTOS DE CHIHUAHUA 8.740% 07/31/16	F	03/24/2009	Various		575,000	575,000	575,000	575,000						575,000				28,035	07/31/2016
706448-BK-2	PEMEX FINANCE LTD SER 99-2 CL A1 9.690%	F	08/15/2009	Redemption		3,666,750	3,666,750	4,186,615	3,711,615		(29,672)		(29,672)		3,681,944		(15,194)	(15,194)	177,654	08/15/2009
75902A-AA-6	PEMEX FINANCE LTD SER 00-1 CL A1 9.030%	F	08/15/2009	Redemption		620,000	620,000	684,127	632,954		(3,458)		(3,458)		629,496		(9,496)	(9,496)	34,991	02/15/2011
780641-AG-1	REGIONAL DIVERSIFIED FUNDING Series 144A 9.250% 03/15/30	F	09/15/2009	100.0000		205,107	205,107	200,550	200,922		26		26		200,948		4,160	4,160	13,322	03/15/2030
869434-AB-6	KONINKLIJKE KPN NV SR UNSEC'D UNSUB NTS 8.000% 10/01/10	F	07/02/2009	Tender Offer		5,325,000	5,000,000	5,757,550	5,235,616		(65,183)		(65,183)		5,170,434		154,566	154,566	301,111	10/01/2010
87203R-AC-6	SUTTON BRIDGE FIN LTD GTD SEC BNDS 144A 7.970% 06/30/22	F	12/31/2009	Redemption		728,153	728,153	728,153	728,153						728,153				43,525	06/30/2022
872402-AK-8	SYSTEMS 2001 ASSET TRUST Series 144A 7.156% 12/15/11	F	12/15/2009	Various		3,159,395	3,159,395	3,221,797	3,178,685		(5,338)		(5,338)		3,173,347		(13,952)	(13,952)	152,067	12/15/2011
887060-AA-2	TFM SA DE CV 9.375% 05/01/12	F	08/26/2009	JP Morgan Securities, Inc.		481,297	490,000	490,000	490,000						490,000		(8,703)	(8,703)	38,281	05/01/2012
887060-AA-2	HELLAS II SERIES 144A 6.034% 01/15/15	F	06/02/2009	Inc.		90,000	500,000	82,500	385,483		6,294	306,973	(300,679)		84,803		5,197	5,197	26,850	01/15/2015
ED3449-16-9	ANGLOGOLD ASHANT 2.375% 02/27/09	F	02/27/2009	Maturity		3,410,000	3,410,000	3,380,392	3,407,366		2,634		2,634		3,410,000				40,494	02/27/2009
EF2365-74-2	DDI HOLDING AS 144A 9.300% 01/19/12	F	01/21/2009	Redemption		283,478	283,478	283,478	283,478						283,478				13,182	01/19/2012
LN2804-18-2	Ineos US Finance ASGN Bank Loan 7.501% 12/16/13	F	12/31/2009	Redemption		6,363	6,363	6,156	6,176		39		39		6,215		148	148	478	12/16/2013
LN2804-22-4	Ineos US Finance ASGN Bank Loan 8.001% 12/16/14	F	12/31/2009	Redemption		6,362	6,362	6,155	6,170		33		33		6,203		159	159	511	12/16/2014
LN3623-11-0	Flextronics Semiconductor 2.447% 10/01/14	F	12/31/2009	Redemption		12,890	12,890	12,761	13,090		(266)		(266)		12,825		65	65	386	10/01/2014
LN3623-15-1	Flextronics Semiconductor 2.448% 10/01/14	F	12/31/2009	Redemption		3,704	3,704	3,667	3,753		(66)		(66)		3,687		17	17	114	10/01/2014
PP6K14-SY-5	CSL FINANCE PTY LTD 5.300% 12/19/12	F	12/19/2009	Redemption		900,000	900,000	924,327	913,334		(3,012)		(3,012)		910,322		(10,322)	(10,322)	47,700	12/19/2012
PP6K14-SZ-2	CSL USA, INC 5.300% 12/19/12	F	12/19/2009	Redemption		385,714	385,714	396,140	391,429		(1,291)		(1,291)		390,138		(4,424)	(4,424)	20,443	12/19/2012
PP6K14-TR-9	MONDADORI INTERNATIONAL 5.420% 12/18/13	F	05/23/2009	Various		20,000,000	20,000,000	19,966,000	19,979,652		1,420		1,420		19,981,071		18,929	18,929	475,756	12/18/2013
<b>3899999. Bonds - Industrial and Miscellaneous (Unaffiliated)</b>						<b>834,796,160</b>	<b>906,131,414</b>	<b>845,429,391</b>	<b>864,264,140</b>	<b>1,031,040</b>	<b>178,618</b>	<b>34,988,362</b>	<b>(33,778,704)</b>		<b>830,496,600</b>		<b>4,299,555</b>	<b>4,299,555</b>	<b>40,637,000</b>	<b>XXX</b>
002270-AA-4	AVA CAPITAL TRUST III FIXtoFLTon 4/09 FLEX TRST PFD 6.500% 04/01/34		04/01/2009	Call	100.0000	2,000,000	2,000,000	2,000,000	2,000,000	115,000			115,000		2,000,000				65,000	
404270-AA-1	HSBC AMERICAS INC CAP SEC II 144A 8.380% 05/15/27		11/27/2009	BOLI-SA PNC/National City		2,204,641	2,160,000	2,238,818	2,208,470		(3,829)		(3,829)		2,204,641				187,042	
984119-AC-1	XEROX CORPORATION CAP SECS 8.000% 02/01/27		09/16/2009	Broadpoint		4,760,000	5,000,000	2,375,000	2,466,062		17,214		17,214		2,483,276		2,276,724	2,276,724	455,556	
125577-AX-4	CIT GROUP INC. 6.100% 03/15/67		07/15/2009	Various		3,945,000	15,000,000	5,689,350	6,684,222		1,279	995,124	(993,845)		5,690,378		(1,745,378)	(1,745,378)	770,633	
<b>4899999. Bonds - Hybrid Securities</b>						<b>12,909,641</b>	<b>24,160,000</b>	<b>12,303,168</b>	<b>13,358,754</b>	<b>115,000</b>	<b>14,664</b>	<b>995,124</b>	<b>(865,460)</b>		<b>12,378,295</b>		<b>531,346</b>	<b>531,346</b>	<b>1,478,231</b>	<b>XXX</b>
<b>8399997. Total - Bonds - Part 4</b>						<b>1,252,575,011</b>	<b>1,485,032,555</b>	<b>1,241,922,260</b>	<b>1,280,344,763</b>	<b>1,146,040</b>	<b>3,582,995</b>	<b>35,983,486</b>	<b>(31,254,451)</b>		<b>1,248,986,483</b>		<b>3,588,547</b>	<b>3,588,547</b>	<b>54,673,562</b>	<b>XXX</b>
<b>8399998. Total - Bonds - Part 5</b>						<b>212,948,211</b>	<b>211,190,932</b>	<b>212,389,707</b>			<b>(793,975)</b>	<b>71,901</b>	<b>(865,876)</b>		<b>211,569,141</b>	<b>45,304</b>	<b>1,379,063</b>	<b>1,424,367</b>	<b>6,739,636</b>	<b>XXX</b>

E14.20

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

**SCHEDULE D - PART 4**

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

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21	
										11	12	13	14	15							
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ Decrease	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (11+12-13)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date	
<b>8399999. Total - Bonds</b>						1,465,523,222	1,696,223,487	1,454,311,967	1,280,344,763	1,146,040	2,789,020	36,055,387	(32,120,327)		1,460,555,624	45,304	4,967,610	5,012,914	61,413,198	XXX	
<b>8999997. Total - Preferred Stocks - Part 4</b>							XXX													XXX	
<b>8999998. Total - Preferred Stocks - Part 5</b>							XXX		305,759						305,759					XXX	
<b>8999999. Total - Preferred Stocks</b>							XXX		305,759						305,759					XXX	
013817-10-1	ALCOA INC		05/22/2009	Various	52,600,000	473,321		1,501,567	592,276	909,291			909,291		1,501,567		(1,028,246)	(1,028,246)		9,755	
131347-30-4	CALPINE CORP COMMON		12/31/2009	Various	6,300,000	69,338		42,903	45,864	78,408			(2,961)		42,903		26,435	26,435			
140570-10-6	Capitol Federal Financial		01/12/2009	Direct Trading	3,800,000	164,609		120,422	173,280	(52,858)			(52,858)		120,422		44,187	44,187			
163893-10-0	Chemtura Corp		11/03/2009	Various	272,000,000	300,264		12,920	380,800	48,249			(367,880)		12,920		287,344	287,344			
171798-10-1	CIMAREX ENERGY CO COMMON		12/30/2009	Various	7,300,000	380,214		206,882	195,494	238,637			11,388		206,882		173,332	173,332		1,752	
172062-10-1	CINCINNATI FINANCIAL CORP		08/18/2009	Various	33,900,000	833,616		1,085,342	985,473	99,869			99,869		1,085,342		(251,726)	(251,726)		34,203	
191216-10-0	COCA COLA CO		10/06/2009	Various	7,600,000	394,553		359,158	344,052	15,106			15,106		359,158		35,394	35,394		8,159	
191219-10-4	COCA-COLA ENTERPRISES COMMON		10/02/2009	First Clearing, LLC	1,400,000	28,642		26,397	16,842	9,555			9,555		26,397		2,245	2,245		308	
268176-10-2	DYNEGY INC-CL A COMMON		06/12/2009	Various	39,500,000	76,206		141,247	79,000	62,247			62,247		141,247		(65,041)	(65,041)			
28336L-10-9	EL PASO CORPORATION		08/04/2009	Various	15,100,000	143,056		311,281	118,233	193,048			193,048		311,281		(168,224)	(168,224)		2,015	
283677-85-4	EL PASO ELECTRIC CO		11/24/2009	Various	21,500,000	366,262		409,822	388,935	20,887			20,887		409,822		(43,559)	(43,559)			
29255W-10-0	ENCORE ACQUISITION CO		12/11/2009	Various	28,900,000	1,167,891		727,508	727,508	213,756			(10,020)		727,508		440,383	440,383			
346233-10-9	FORESTAR REAL ESTATE GROUP COMMON		12/24/2009	Various	8,100,000	124,716		58,340	77,112	(18,772)			(18,772)		58,340		66,377	66,377			
388689-10-1	GRAPHIC PACKAGING HOLDING CO COMMON		12/28/2009	Various	11,000,000	37,638		33,840	12,540	21,300			21,300		33,840		3,798	3,798			
42809H-10-7	HESS CORP		08/07/2009	Various	3,300,000	162,480		208,245	177,012	145,893			114,660		208,245		(25,765)	(25,765)		990	
428236-10-3	HEWLETT-PACKARD CO		11/25/2009	Various	42,700,000	1,931,291		1,619,710	1,549,583	70,127			70,127		1,619,710		311,581	311,581		10,616	
440694-30-5	HORSEHEAD HOLDING CORP COMMON		12/04/2009	Various	10,300,000	120,193		42,749	48,410	(5,661)			(5,661)		42,749		77,444	77,444			
549271-10-4	LUBRIZOL COMMON		06/15/2009	Various	11,300,000	512,812		392,743	411,207	(18,464)			(18,464)		392,743		120,068	120,068		7,006	
553120-20-8	MMC ENERGY INC		04/14/2009	Weeden & Company	62,700,000	48,130		164,865	109,689	55,176			55,176		109,689		(116,736)	(116,736)			
583334-10-7	MEADWESTVACO CORP COMMON		12/15/2009	Various	78,700,000	1,955,754		1,455,841	880,653	575,188			575,188		1,455,841		499,912	499,912		57,799	
587902-10-7	MERCER INSURANCE GROUP INC COMMON		09/11/2009	Various	4,400,000	81,193		74,071	55,616	18,455			18,455		74,071		7,122	7,122		705	
589433-10-1	Meredith Corp		08/19/2009	Various	600,000	16,839		32,267	10,272	21,995			21,995		32,267		(15,428)	(15,428)		270	
60467R-10-0	MIRANT CORP		12/29/2009	Various	4,300,000	66,834		170,323	81,141	89,182			89,182		170,323		(103,489)	(103,489)			
640079-10-9	NEENAH PAPER INC		12/04/2009	Various	7,000,000	83,542		193,407	61,880	131,527			131,527		193,407		(109,865)	(109,865)		2,200	
651639-10-6	NEWMONT MINING CORP		09/18/2009	Various	26,100,000	1,169,643		1,286,836	1,062,270	224,566			224,566		1,286,836		(117,193)	(117,193)		3,330	
668074-30-5	NORTHWESTERN CORP COMMON		05/06/2009	Various	26,000,000	561,203		645,263	610,220	35,043			35,043		645,263		(84,061)	(84,061)		7,270	
67073Y-10-6	NV Energy		09/15/2009	Various	900,000	10,529		9,311	8,901	410			410		9,311		1,218	1,218		270	
701081-10-1	PARKER DRILLING CO COMMON		09/11/2009	Various	104,900,000	430,041		855,998	304,210	551,788			551,788		855,998		(425,958)	(425,958)			
726505-10-0	PLAINS EXPLORATION & PROD COMMON		06/23/2009	Various	42,294,000	1,090,802		1,709,431	982,913	945,193			218,674		1,709,431		(618,629)	(618,629)			
855707-10-5	STATE AUTO FINANCIAL CORP		12/21/2009	Direct Trading	400,000	7,135		13,741	12,024	1,717			1,717		13,741		(6,607)	(6,607)		240	
884453-10-1	THOMAS PROPERTIES GROUP		12/31/2009	Direct Trading	24,300,000	71,609		208,606	62,937	145,669			145,669		208,606		(136,998)	(136,998)		2,369	
890516-10-7	Tootsie Roll		04/09/2009	Direct	1,000			26	22	3			3		26		(20)	(20)			
909205-10-6	Unisource Energy Corp		12/30/2009	Various	77,600,000	2,340,269		2,360,214	2,278,336	81,878			81,878		2,360,214		(19,944)	(19,944)		66,932	
931422-10-9	WALGREEN CO		10/19/2009	Various	11,900,000	461,499		354,641	293,573	61,068			61,068		354,641		106,858	106,858		4,314	
969490-10-1	CLAYTON WILLIAM COMMON		12/23/2009	INV Technology GP Inc	1,200,000	41,499		35,088	54,528	54,060			73,500		35,088		6,411	6,411			
067901-10-8	Barrick Gold Corp	A.	09/17/2009	Jefferies & Co., Inc.	2,000,000	75,961		64,840	73,540	33,324			42,024		64,840		11,121	11,121		340	
257559-10-4	DOMSTAR CORP	A.	06/11/2009	Tax Free Exchange	605,026,000	2,639,157		2,687,905	1,010,393	1,677,512			1,677,512		2,687,905		(48,748)	(48,748)			
65334H-10-2	NEXEN INC COMMON	A.	06/11/2009	Various	14,900,000	377,653		581,254	261,942	319,312			319,312		581,254		(203,601)	(203,601)		1,242	
71644E-10-2	PETRO-CANADA COMMON	A.	07/31/2009	Various	105,200,000	4,277,542		3,489,278	2,302,828	1,970,170			783,720		3,489,278		788,265	788,265		40,436	
87425E-10-3	TALISMAN ENERGY INC COMMON	A.	03/25/2009	Various	61,500,000	627,411		1,103,003	614,385	488,618			488,618		1,103,003		(475,592)	(475,592)			
887147-20-5	TIMBERWEST FOREST CRP	C.	01/05/2009	Spin Off	0,000			77,545	18,976	48,800			9,769		77,545						
887147-20-5	TIMBERWEST FOREST CRP	C.	05/11/2009	Tax Free Exchange	240,900,000	2,014,702		2,745,365	671,819	1,727,215			1,727,215		2,553,836		(191,219)	(191,219)			
92849T-10-8	VITERRA INC	C.	12/01/2009	Various	25,600,000	258,900		290,553	197,003	40,534			40,534		279,769		(20,869)	(20,869)			
035128-20-6	ANGLOGOLD ASHANTI-SPON ADR	F.	10/09/2009	Various	17,500,000	708,080		434,273	484,925	(50,652)			(50,652)		434,273		273,807	273,807		1,518	
656531-60-5	NORSK HYDRO	F.	08/19/2009	Various	76,600,000	416,511		691,870	304,117	563,370			175,617		691,870		(275,359)	(275,359)			
66052F-10-3	MAX CAPITAL GROUP LTD MAX CAPITAL GROUP LTD	F.	12/18/2009	Various	5,200,000	120,359		128,886	92,040	36,846			36,846		128,886		(8,527)	(8,527)		1,976	
69143X-20-8	Tyco International LTD	F.	03/17/2009	Tax Free Exchange	23,900,000	888,451		888,999	516,240	372,759			372,759		888,999		(547)	(547)		4,280	
<b>9099999. Common Stocks - Industrial and Miscellaneous (Unaffiliated)</b>						28,225,900	XXX	30,054,778	19,696,521	12,305,857			2,356,718	9,949,139	408,787	29,852,463	(202,005)	(1,626,564)	(1,828,569)	270,295	XXX
723682-10-0	Pioneer Fund A		12/31/2009	Pioneer	853,120	25,401		24,330	24,851	(521)			(521)		24,330		1,071	1,071			
724010-10-3	Pioneer Value Fund A		12/31/2009	Pioneer	19,506	179		235	172	63			63		235		(56)	(56)			
723750-10-8	Pioneer Mid Cap Value Fund A		12/31/2009	Pioneer	39,432	612		663	574	89			89		663		(				

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

**SCHEDULE D - PART 4**

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

1 CUSIP Identi- fication	2 Description	3 For- eign	4 Disposal Date	5 Name of Purchaser	6 Number of Shares of Stock	7 Con- sideration	8 Par Value	9 Actual Cost	10 Prior Year Book/ Adjusted Carrying Value	Change In Book/Adjusted Carrying Value					16 Book/ Adjusted Carrying Value at Disposal Date	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Bond Interest/ Stock Dividends Received During Year	21 Maturity Date
										11 Unrealized Valuation Increase/ Decrease	12 Current Year's (Amor- tization)/ Accretion	13 Current Year's Other Than Temporary Impairment Recognized	14 Total Change in Book/ Adjusted Carrying Value (11+12-13)	15 Total Foreign Exchange Change in Book/ Adjusted Carrying Value						
72387P-72-6	Pioneer Government Income Fund A		12/31/2009	Pioneer	39,495	388		393	387	6			6		393		(4)	(4)		
9299999	Common Stocks - Mutual Funds					57,036	XXX	47,449	52,678	(5,229)			(5,229)		47,449		9,588	9,588		XXX
9799997	Total - Common Stocks - Part 4					28,282,936	XXX	30,102,227	19,749,199	12,300,628		2,356,718	9,943,910	408,787	29,899,912	(202,005)	(1,616,976)	(1,818,981)	270,295	XXX
9799998	Total - Common Stocks - Part 5					12,827,591	XXX	6,884,744				50,673	(50,673)		6,896,447	62,374	5,931,149	5,993,523	112,906	XXX
9799999	Total - Common Stocks					41,110,527	XXX	36,986,971	19,749,199	12,300,628		2,407,391	9,893,237	408,787	36,796,359	(139,631)	4,314,173	4,174,542	383,201	XXX
9899999	Total - Preferred and Common Stocks					41,416,286	XXX	37,292,730	19,749,199	12,300,628		2,407,391	9,893,237	408,787	37,102,118	(139,631)	4,314,173	4,174,542	383,201	XXX
9999999	Totals					1,506,939,508	XXX	1,491,604,697	1,300,093,962	13,446,668	2,789,020	38,462,778	(22,227,090)	408,787	1,497,657,742	(94,327)	9,281,783	9,187,456	61,796,399	XXX

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

**SCHEDULE D - PART 5**

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

1	2	3	4	5	6	7	8	9	10	11	Change in Book/Adjusted Carrying Value					17	18	19	20	21
											12	13	14	15	16					
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Disposal Date	Name of Purchaser	Par Value (Bonds) or Number of Shares (Stock)	Actual Cost	Consideration	Book/Adjusted Carrying Value at Disposal	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (12 + 13 - 14)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Interest and Dividends Received During Year	Paid for Accrued Interest and Dividends
36202F-BK-1	Government National Mortgage A POOL		09/30/2009	Morgan Stanley & Co., Inc.	12/01/2009	Paydown	54,183	56,982	54,183	54,183		(2,798)		(2,798)					394	166
3620A2-T5-5	GNMA 5.000% 05/15/39		06/23/2009	JP Morgan Securities, Inc.	12/01/2009	Paydown	1,196,783	1,214,548	1,196,783	1,196,783		(17,765)		(17,765)					19,510	3,158
3620A9-PZ-8	Government National Mortgage A POOL		11/03/2009	Banc of America Securities	12/01/2009	Paydown	20,151	20,903	20,151	20,151		(753)		(753)					84	50
3620AA-TX-6	Government National Mortgage A POOL		10/06/2009	Banc of America Securities	12/01/2009	Paydown	172,097	181,293	172,097	172,097		(9,196)		(9,196)					986	526
36295P-U2-6	Government National Mortgage A POOL		05/05/2009	Direct	12/01/2009	Paydown	3,139,923	3,308,102	3,139,923	3,139,923		(168,179)		(168,179)					77,143	2,268
36295P-YT-3	Government National Mortgage A POOL		09/18/2009	Morgan Stanley & Co., Inc.	12/01/2009	Paydown	988,984	1,037,042	988,984	988,984		(48,058)		(48,058)					8,668	3,022
36296Q-3N-7	Government National Mortgage A POOL		08/18/2009	Banc of America Securities	12/01/2009	Paydown	1,079,702	1,105,851	1,079,702	1,079,702		(26,149)		(26,149)					11,416	2,999
36296Q-H9-3	Government National Mortgage A POOL		09/18/2009	Morgan Stanley & Co., Inc.	12/01/2009	Paydown	1,121,912	1,176,430	1,121,912	1,121,912		(54,518)		(54,518)					11,037	3,428
36296X-HC-1	Government National Mortgage A POOL		02/06/2009	JP MORGAN EQUITIES	12/01/2009	Paydown	3,289,417	3,394,267	3,289,417	3,289,417		(104,850)		(104,850)					80,272	9,046
36297A-KW-2	Government National Mortgage A POOL		05/05/2009	Various	12/01/2009	Paydown	4,307,283	4,451,883	4,307,283	4,307,283		(144,600)		(144,600)					93,183	8,438
36297A-KW-2	Government National Mortgage A POOL		02/10/2009	Banc of America Securities	11/27/2009	BOLI-SA PNC/National City	4,792,000	4,935,760	4,930,587	4,930,587		(5,173)		(5,173)					216,705	13,178
36297C-YC-7	Government National Mortgage A POOL		02/06/2009	Sandler O'Neil	12/01/2009	Paydown	1,375,698	1,410,951	1,375,698	1,375,698		(35,252)		(35,252)					46,355	3,783
36297E-YV-1	Government National Mortgage A Pool #		09/10/2009	Jefferies & Co., Inc.	12/01/2009	Paydown	163,649	173,973	163,649	163,649		(10,324)		(10,324)					2,234	571
36297E-YV-1	Government National Mortgage A Pool #		11/01/2009	Interest Capitalization	12/01/2009	Paydown	1,121	1,121	1,121	1,121									8	
<b>0399999. Bonds - U.S. Governments</b>							21,702,903	22,469,106	21,841,490	21,841,490		(627,615)		(627,615)					567,995	50,633
31359A-KE-8	FNMA REMIC SER 1993-65 ZZ (ACRL)		01/01/2009	Direct	12/25/2009	Call	99,6765	80,959	80,697	80,959								(262)	(262)	13,290
31359F-TF-5	FNMA REMIC SER 1993-223 PZ (PAC Z)		10/01/2009	Interest Capitalization	12/01/2009	Paydown	7,251	7,251	7,251	7,251									240	
31368H-NN-9	Fannie Mae 5.000% 09/01/39		08/27/2009	Citibank Mortgages	12/01/2009	Paydown	584,179	598,007	584,179	584,179		(13,829)		(13,829)					5,368	1,055
31392E-3V-0	FNMA REMIC SER 2002-71 PZ (PAC-Z)		12/01/2009	Interest Capitalization	12/30/2009	BOLI- SA Renasant Bank	36,001	36,001	34,000	34,000		(2,001)		(2,001)					1,058	
31393C-5M-1	FNMA REMIC SER 2003-66 MZ (PAC Z)		12/01/2009	Interest Capitalization	12/30/2009	BOLI- SA Renasant Bank	30,158	30,158	27,836	27,836		(2,322)		(2,322)					806	
31393W-BR-9	FHLMC REMIC SER 2640 PZ (PAC Z)		12/01/2009	Interest Capitalization	12/30/2009	BOLI- SA Renasant Bank	50,279	50,279	45,286	45,286		(4,993)		(4,993)					1,344	
31394M-KN-9	FHLMC REMIC SER 2714 LZ (PAC Z)		12/01/2009	Interest Capitalization	12/30/2009	BOLI- SA Renasant Bank	107,984	107,984	102,204	102,204		(5,781)		(5,781)					3,173	
31398E-L2-8	FREDDIE MAC 3554 3.400% 07/15/19		07/08/2009	First Tennessee Bank	12/01/2009	Paydown	1,206,671	1,208,933	1,206,671	1,206,671		(2,263)		(2,263)					10,754	3,305
31412Q-BN-8	FANNIE MAE 5.000% 07/01/39		07/13/2009	UBS PaineWebber, Inc.	12/01/2009	Paydown	1,267,797	1,296,124	1,267,797	1,267,797		(28,327)		(28,327)					16,338	2,113
31412U-H3-7	FANNIE MAE POOL 935050 5.000%		05/06/2009	Citigroup Global Markets	12/01/2009	Paydown	710,302	731,611	710,302	710,302		(21,309)		(21,309)					11,825	1,085
31414P-4Z-9	FANNIE MAE POOL 972540 5.000%		02/13/2009	JMP Securities	12/01/2009	Paydown	560,630	576,398	560,630	560,630		(15,768)		(15,768)					12,150	1,542
31415Y-XT-1	FANNIE MAE POOL 993590 5.000%		05/22/2009	Morgan Stanley & Co., Inc.	12/01/2009	Paydown	509,987	524,569	509,987	509,987		(14,582)		(14,582)					8,797	708
31416H-Q3-2	FANNIE MAE POOL AA0473 5.000%		03/01/39	Greenwich Capital Mkts., Inc.	12/01/2009	Paydown	5,208,590	5,301,368	5,208,590	5,208,590		(92,778)		(92,778)					110,700	7,958
31416M-KD-5	Fannie Mae 5.000% 03/01/39		08/31/2009	Citibank Mortgages	12/01/2009	Paydown	1,580,287	1,622,263	1,580,287	1,580,287		(41,976)		(41,976)					13,606	2,853
31416R-GU-1	FANNIE MAE POOL AA7410 5.000%		05/29/2009	JP Morgan Securities, Inc.	12/01/2009	Paydown	515,606	528,657	515,606	515,606		(13,051)		(13,051)					9,352	716
31416R-PC-1	FANNIE MAE POOL AA7618 5.000%		05/06/2009	KBC Securities	12/01/2009	Paydown	749,573	772,646	749,573	749,573		(23,073)		(23,073)					11,268	1,145
31418M-J7-8	Fannie Mae POOL AD0285 5.000%		10/22/2009	Credit Suisse First Boston	12/01/2009	Paydown	497,119	525,315	497,119	497,119		(28,196)		(28,196)					2,071	1,105

E15

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

**SCHEDULE D - PART 5**

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

1	2	3	4	5	6	7	8	9	10	11	Change in Book/Adjusted Carrying Value					17	18	19	20	21
											12	13	14	15	16					
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Disposal Date	Name of Purchaser	Par Value (Bonds) or Number of Shares (Stock)	Actual Cost	Consideration	Book/Adjusted Carrying Value at Disposal	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (12 + 13 - 14)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Interest and Dividends Received During Year	Paid for Accrued Interest and Dividends
37611C-AA-4	GNMA REMIC SERIES 200775 CLASS A 4.74% 04/16/29		06/05/2009	Raymond James & Associates	12/01/2009	Paydown	42,171	43,251	42,171	42,171		(1,081)		(1,081)					587	89
38373M-AK-6	GNMA REMIC SER 2001-16 Z (AFC-PZ) 6.750% 10/16/40		02/01/2009	Interest Capitalization	12/01/2009	Paydown	18,073	18,073	18,073	18,073									697	
38373M-G4-6	GNMA REMIC SERIES 200734 CLASS A 4.272% 11/16/26		10/07/2009	Various	12/01/2009	Paydown	6,413	6,588	6,413	6,413		(175)		(175)					34	4
38373M-PT-1	GNMA REMIC SERIES 200529 CLASS A 4.016% 07/16/27		10/07/2009	Raymond James & Associates	12/01/2009	Paydown	5,285	5,436	5,285	5,285		(151)		(151)					27	7
38373M-Q2-9	GNMA REMIC 2008-8 A 3.612% 11/16/27		09/04/2009	COHEN & CO	12/01/2009	Paydown	44,831	45,671	44,831	44,831		(841)		(841)					270	40
38373M-SX-9	GNMA REMIC SERIES 20065 CLASS A 4.241% 07/16/29		10/07/2009	First Tennessee Bank	12/01/2009	Paydown	15,173	15,636	15,173	15,173		(463)		(463)					80	21
38373M-V2-3	GNMA REMIC SERIES 200845 CLASS A 3.576% 11/16/27		08/19/2009	Goldman Sachs & Co.	12/01/2009	Paydown	10,222	10,381	10,222	10,222		(158)		(158)					76	23
38373M-VU-1	GNMA REMIC 2006-39 A 3.772% 06/16/25		09/16/2009	COHEN & CO	12/01/2009	Paydown	29,610	30,295	29,610	29,610		(685)		(685)					186	62
38375D-LM-8	GNMA REMIC SERIES 200858 CLASS PA 5.500% 06/16/36		05/05/2009	Direct	12/01/2009	Paydown	3,745,456	3,920,739	3,745,456	3,745,456		(175,282)		(175,282)					68,310	2,289
38376C-AH-2	GNMA 2009-83 MA 4.500% 10/20/26		09/23/2009	Raymond James & Associates	12/01/2009	Paydown	383,234	398,923	383,234	383,234		(15,689)		(15,689)					2,972	1,389
<b>3199999. Bonds - U.S. Special Revenues</b>							<b>18,003,841</b>	<b>18,493,516</b>	<b>17,988,483</b>	<b>17,988,745</b>		<b>(504,774)</b>		<b>(504,774)</b>			<b>(262)</b>	<b>(262)</b>	<b>305,379</b>	<b>27,509</b>
01741R-AD-4	ALLEGHENY TECHNOLOGIES 4.250% 06/01/14		05/28/2009	JP Morgan Securities, Inc.	06/01/2009	JP Morgan Securities, Inc.	50,000	50,000	56,933	50,000							6,933	6,933	12	
02149D-AJ-8	Countrywide Alt. Loan Trust Series 2006- HY13 Class 3A1 5.911% 01/25/47		01/01/2009	Various	12/01/2009	Various	373,736	375,277	373,736	373,736		23,006	24,547	(1,541)					5,125	1,670
035290-AJ-4	ANIXTER INTERNATIONAL INC BASIC 1.000% 02/15/13		02/10/2009	Merrill Lynch	08/10/2009	Miller Tabak Roberts	125,000	99,153	107,031	102,004		2,851		2,851			5,027	5,027	1,243	618
053774-AA-3	Avis Budget Grp 144A 3.500% 10/01/14		10/08/2009	JP Morgan Securities, Inc.	10/21/2009	Miller Tabak Roberts	75,000	75,000	74,601	75,000						(399)	(399)		182	
05577@-AG-5	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/13/2009	JP Morgan Securities, Inc.	08/26/2009	Redemption 100.0000	167,234	167,234	167,234	167,234									5,477	
05577@-AH-3	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/13/2009	JP Morgan Securities, Inc.	08/26/2009	Redemption 100.0000	160,953	160,953	160,953	160,953									5,271	
05577@-AJ-9	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/12/2009	JP Morgan Securities, Inc.	08/26/2009	Redemption 100.0000	50,195	50,195	50,195	50,195									1,644	
05577@-AK-6	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/13/2009	JP Morgan Securities, Inc.	08/26/2009	Redemption 100.0000	50,612	50,612	50,612	50,612									1,658	
05577@-AM-2	BURLINGTON NORTH PRIVATE PLACEMENT 6.550% 02/26/21		02/12/2009	JP Morgan Securities, Inc.	08/26/2009	Redemption 100.0000	21,006	21,006	21,006	21,006									688	
05952C-AA-8	BANC OF AMERICA COMMERCIAL MOR SERIES 20075 CLASS A1 5.175% 02/10/51		05/05/2009	Direct	12/01/2009	Paydown	4,213,034	4,119,673	4,213,034	4,213,034		93,361		93,361					93,062	2,422
05952F-AE-3	BANC OF AMERICA MORTGAGE 2007-2 A5 5.500% 05/25/37		01/01/2009	BOLI-SA Roslyn 00-1	12/01/2009	Paydown	285,782	282,621	285,782	285,782		6,528	3,367	3,161					6,488	786
05952H-AG-4	BANC OF AMERICA MTG SECURITIES 2007-1 1A7 5.750% 03/25/37		01/01/2009	Various	12/01/2009	Various	1,811,203	1,808,757	1,811,203	1,811,203		2,447		2,447					25,919	7,811
125896-BD-1	CMS ENERGY HLDG CO 5.500% 06/15/29		11/05/2009	Barclays Capital, Inc.	12/21/2009	Barclays Capital, Inc.	25,000	28,438	30,656	28,425		(12)		(12)			2,231	2,231	722	554
173110-BE-9	CITIGROUP COMMERCIAL MORTGAGE SERIES 2007C6 CLASS A1 5.622% 12/10/49		05/05/2009	Direct	12/01/2009	Paydown	402,154	405,360	402,154	402,154		(3,206)		(3,206)					7,476	251
18449E-AE-7	Clean Harbors 144A 7.625% 08/15/16		08/11/2009	Goldman Sachs & Co.	10/29/2009	Various	720,000	701,057	733,125	701,493		436		436		31,632	31,632	11,588		
268648-AK-8	EMC CORP MASS BASIC 1.750% 12/01/11		02/12/2009	Robert W. Baird & Co., Inc.	11/17/2009	Various	425,000	426,063	493,906	425,835		(228)		(228)			68,072	68,072	6,170	1,591
277461-BZ-5	EASTMAN KODAK 144A 7.000% 04/01/17		09/17/2009	Merrill Lynch	09/29/2009	Various	650,000	653,438	653,438	650,000							3,438	3,438	1,001	
345550-AL-1	FOREST CITY ENTERPRISES 144A 5.000% 10/15/16		10/21/2009	Barclays Capital, Inc.	11/12/2009	Barclays Capital, Inc.	25,000	25,000	25,750	25,000							750	750	73	
35804G-AF-5	FRESENTIUS US FINANCE II 144A 9.000% 07/15/15		01/15/2009	JP Morgan Securities, Inc.	03/18/2009	JP Morgan Securities, Inc.	265,000	246,651	270,963	246,993		341		341			23,970	23,970	4,108	
36246L-AA-9	GS MORTGAGE SECURITIES CORPORA SERIES 2007GG10 CLASS A1 5.690% 08/10/45		05/05/2009	Direct	12/01/2009	Paydown	93,295	91,146	93,295	93,295		2,149		2,149					1,810	59

E15.1

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

**SCHEDULE D - PART 5**

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

1	2	3	4	5	6	7	8	9	10	11	Change in Book/Adjusted Carrying Value					17	18	19	20	21
											12	13	14	15	16					
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Disposal Date	Name of Purchaser	Par Value (Bonds) or Number of Shares (Stock)	Actual Cost	Consideration	Book/ Adjusted Carrying Value at Disposal	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/ Adjusted Carrying Value (12 + 13 - 14)	Total Foreign Exchange Change in Book/ Adjusted Carrying Value	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Interest and Dividends Received During Year	Paid for Accrued Interest and Dividends
36298Y-AA-8	GSAA Home equity Trust 0.281% 09/25/36		11/18/2009	Direct	12/03/2009	JP Morgan Securities, Inc.	2,652,752	2,652,752	1,246,793	2,652,752							(1,405,958)	(1,405,958)	923	498
36298Y-AA-8	GSAA Home equity Trust 0.281% 09/25/36		11/18/2009	Direct	11/25/2009	Paydown	104,186	104,186	104,186	104,186									26	20
369300-AK-4	GENERAL CABLE CORP BASIC 1.000% 10/15/12		01/28/2009	Merrill Lynch	12/18/2009	Taxable Exchange	530,000	347,994	461,763	384,544		36,550		36,550			77,218	77,218	6,228	1,491
369300-AL-2	GENERAL CABLE CORP BASIC 4.500% 11/15/29		12/18/2009	Taxable Exchange	12/18/2009	Direct	250	235	250	235							15	15		
404119-BA-6	HCA - THE HEALTHCARE CO BASIC 9.625% 11/15/16		05/15/2009	Interest Capitalization	06/17/2009	Direct	43	43	39	43							(4)	(4)		
404119-BE-8	HCA - THE HEALTHCARE CO 144A 8.500% 04/15/19		04/15/2009	Citigroup Global Markets	11/04/2009	Barclays Capital, Inc.	445,000	430,560	470,588	431,055		495		495			39,533	39,533	20,699	
452308-AF-6	ILLINOIS TOOL WORKS 144A 5.150% 04/01/14		03/23/2009	Banc of America Securities	09/21/2009	Tax Free Exchange	40,000,000	39,968,000	39,971,072	39,971,072		3,072		3,072					1,001,389	
452308-AG-4	ILLINOIS TOOL WORKS 144A 6.250% 04/01/19		03/26/2009	Various	09/21/2009	Tax Free Exchange	49,600,000	49,662,440	49,661,056	49,661,056		(1,384)		(1,384)					1,506,944	14,410
46630G-BC-8	JP MORGAN MORTGAGE TRUST 2007-A2 3A1 5.290% 07/25/35		01/01/2009	Various	12/01/2009	Various	1,190,267	1,182,898	1,190,267	1,190,267		7,369		7,369					16,250	4,726
46630P-AP-0	5.815% 04/25/37 JANUS CAPITAL GROUP INC 3.250%		01/01/2009	BOLI-SA Allfirst 99-1	12/01/2009	Paydown	422,967	420,684	422,967	422,967		2,283		2,283					5,748	1,854
47102X-AG-0	07/15/14		07/15/2009	JP Morgan Securities, Inc.	07/27/2009	JP Morgan Securities, Inc.	75,000	75,000	87,288	75,000							12,288	12,288	61	
477143-AC-5	Jetblue Airways 3.750% 03/15/35 MASTER ASSET SECURITIZATION 2006-3 1A10		01/27/2009	Pershing/CJS Securities	04/29/2009	Pershing/CJS Securities	75,000	62,100	68,250	62,168		68		68			6,082	6,082	1,789	1,055
55274S-AK-7	6.000% 10/25/36		01/01/2009	BOLI-SA Sovereign Bank 99-1	12/01/2009	Paydown	112,187	112,371	112,187	112,187		(184)		(184)					1,677	505
64110D-AA-2	NETAPP INC 144A 1.750% 06/01/13		03/18/2009	Various	05/29/2009	Various	275,000	226,515	240,757	228,637		2,122		2,122			12,119	12,119	2,222	1,198
64110D-AA-2	NETAPP INC 144A 1.750% 06/01/13		03/13/2009	Various	07/10/2009	Tax Free Exchange	950,000	764,107	779,523	779,523		15,416		15,416					10,114	3,295
64110D-AB-0	NETAPP INC 1.750% 06/01/13 PETROHAWK ENERGY CORP 144A 10.500%		07/10/2009	Tax Free Exchange	12/07/2009	Various	950,000	779,523	1,100,494	793,322		13,799		13,799			307,172	307,172	7,722	1,801
716495-AE-6	08/01/14		01/22/2009	JP Morgan Securities, Inc.	10/22/2009	Tax Free Exchange	370,000	337,732	340,900	340,900		3,168		3,168					28,598	
744320-AJ-1	12/15/37		03/10/2009	Barclays Capital, Inc.	06/12/2009	Direct	200,000	193,500	200,000	193,555		55		55			6,445	6,445	183	179
74913G-AU-9	QUIEST CORP 144A 8.375% 05/01/16		04/07/2009	JP Morgan Securities, Inc.	12/18/2009	Tax Free Exchange	1,000,000	924,980	930,319	930,319		5,339		5,339					56,997	
781750-AC-8	Rural/Metro Oper 9.875% 03/15/15 SCIENTIFIC GAMES INTERNA 144A 9.250%		10/08/2009	Jefferies & Co., Inc.	12/09/2009	Tender Offer	500,000	500,625	527,070	500,625							26,445	26,445	21,521	3,977
80874Y-AE-0	06/15/19		05/18/2009	JP Morgan Securities, Inc.	10/30/2009	Tax Free Exchange	390,000	377,610	377,974	377,974		365		365					15,933	
883203-BN-0	TEXTRON INC TXT 4.500% 05/01/13 US ONCOLOGY INC 144A 9.125% 08/15/17		04/29/2009	JP Morgan Securities, Inc.	05/05/2009	Inc.	50,000	50,000	55,048	50,000							5,048	5,048	19	
90338W-AJ-2	UMBRELLA ACQUISITION Series 144A 9.750% 03/15/15		06/05/2009	Morgan Stanley & Co., Inc.	12/15/2009	Tax Free Exchange	500,000	489,625	489,946	489,946		321		321					22,432	
904201-AA-8	US STEEL CORP 4.000% 05/15/14		09/15/2009	Interest Capitalization	12/01/2009	Inc.	78,750	78,750	61,773	10,569		(24,194)	43,987	(68,181)			51,203	51,203	1,621	
912909-AE-8	VERIZON WIRELESS 144A 8.500% 11/15/18		04/28/2009	JP Morgan Securities, Inc.	04/30/2009	Direct Trading	125,000	125,000	132,531	125,000							7,531	7,531	14	
92344S-AG-5	Wells Fargo Series 2006-12 A1 6.000% 10/25/36		01/27/2009	First Tennessee Bank	11/15/2009	Tax Free Exchange	25,000,000	29,420,000	29,153,913	29,153,913		(266,087)		(266,087)					2,089,583	407,292
94984H-AA-3	BL CHARTER COMM CHARTER COMMUNICATIONS 2.260% 09/06/14		01/01/2009	Various	12/01/2009	Various	210,993	210,995	210,993	210,993		(2)		(2)					3,672	492
LN0135-81-1	Vought Aircraft Company Bank Loan 0.234% 12/22/11		01/06/2009	JP Morgan Securities, Inc.	12/31/2009	Redemption 100.0000	35,290	27,350	35,290	28,079		730		730			7,211	7,211	790	
LN1953-14-7	Acco Brands Corp Bank Loans 0.215% 08/17/12		04/17/2009	Citigroup Global Markets	12/31/2009	Redemption 100.0000	227,605	182,084	227,605	189,284		7,200		7,200			38,320	38,320	585	
LN2269-09-7	Neiman Marcus Group Inc Bank Loans 2.255% 04/06/13		04/16/2009	CIBC World Markets Corp.	09/30/2009	Redemption 100.0000	1,500,000	952,500	1,500,000	1,009,477		56,977		56,977			490,523	490,523	39,499	
LN2303-11-0	BL PANAMSAT 2.914% 01/03/14		06/02/2009	Credit Suisse First Boston	10/27/2009	Morgan Stanley & Co., Inc.	6,552	4,898	6,552	5,039		141		141			1,513	1,513	43	
LN2430-43-4	BL PANAMSAT 2.914% 01/03/14		01/14/2009	Various	06/10/2009	Redemption 100.0000	2,048,619	1,690,406	1,905,216	1,741,191		50,785		50,785			164,025	164,025	30,623	
LN2430-43-4	BL PANAMSAT 2.914% 01/03/14		01/14/2009	Citigroup Global Markets	04/06/2009		6,381	5,344	6,381	5,372		28		28			1,009	1,009	59	

E15.2



## ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra Life Insurance Company

## SCHEDULE D - PART 5

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

1	2	3	4	5	6	7	8	9	10	11	Change in Book/Adjusted Carrying Value					17	18	19	20	21
											12	13	14	15	16					
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Disposal Date	Name of Purchaser	Par Value (Bonds) or Number of Shares (Stock)	Actual Cost	Consideration	Book/Adjusted Carrying Value at Disposal	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (12 + 13 - 14)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Interest and Dividends Received During Year	Paid for Accrued Interest and Dividends
LN2510-91-2	AMC ENTERTAINMENT INC 0.258% 01/26/13		01/20/2009	Citigroup Global Markets	05/22/2009	Barclays Capital, Inc.	494,341	427,605	453,558	432,927		5,322		5,322			20,631	20,631	3,280	
LN2510-91-2	AMC ENTERTAINMENT INC 0.258% 01/26/13		01/20/2009	Citigroup Global Markets	03/31/2009	Redemption	5,659	4,895	5,659	4,924		30		30			734	734	18	
LN2641-10-5	BL SENSATA TLB 2.031% 04/27/13		02/24/2009	Citigroup Global Markets	12/31/2009		9,577	4,382	9,577	4,750		368		368			4,828	4,828	69	
LN2813-80-3	REXNORD CORP TLB1 BANK LOAN 6.003% 07/19/13		05/06/2009	Credit Suisse First Boston	12/11/2009	Banc of America Securities	500,000	410,000	463,750	420,695		10,695		10,695			43,055	43,055	6,119	
LN2849-00-5	NIELSEN FINANCE LLC/CO 2.188% 08/09/13		01/29/2009	Credit Suisse First Boston	11/05/2009	Banc of America Securities	1,000,000	807,500	913,750	844,841		37,341		37,341			68,909	68,909	15,201	
LN2849-00-5	NIELSEN FINANCE LLC/CO 2.188% 08/09/13		01/29/2009	Credit Suisse First Boston	06/23/2009	Redemption	250,043	201,910	250,043	206,873		4,964		4,964			43,170	43,170	1,447	
LN2999-69-3	Sally Beauty SALLY BEAUTY TERM LOAN B 0.074% 11/16/13		02/02/2009	Banc of America Securities	09/29/2009	Banc of America Securities	1,473,493	1,234,051	1,392,217	1,263,688		29,637		29,637			128,529	128,529	18,402	
LN2999-69-3	Sally Beauty SALLY BEAUTY TERM LOAN B 0.074% 11/16/13		02/02/2009	Banc of America Securities	06/30/2009	Redemption	26,507	22,199	26,507	22,659		460		460			3,847	3,847	254	
LN3029-72-2	FREESCALE SEMICONDUCTOR INC Bank Loans 1.985% 12/01/13		06/16/2009	Citigroup Global Markets	12/01/2009		3,253	2,481	3,253	2,531		51		51			722	722	8	
LN3032-49-4	FORD MOTOR COMPANY Bank Loan 3.289% 12/16/13		06/08/2009	JP Morgan Securities, Inc.	12/15/2009	Redemption	16,698	12,273	16,698	12,633		359		359			4,066	4,066	10	
68824B-AJ-5	OSHKOSH TRUCK Bank Loans 6.277% 12/06/13		07/27/2009	Banc of America Securities	12/31/2009	Redemption	39,764	39,366	39,764	39,377		10		10			387	387	74	
LN3039-03-6	BL MOMENTIVE TL 0.078% 12/04/13		02/26/2009	JP Morgan Securities, Inc.	12/31/2009	Redemption	7,123	5,413	7,123	5,610		197		197			1,513	1,513	98	
LN3129-21-7	BUILDING MAT COR Bank Loans 3.000% 02/22/14		07/10/2009	Goldman Sachs & Co.	12/31/2009	Redemption	2,497	2,122	2,497	2,153		30		30			344	344	9	
LN3161-09-5	BL OPEN SOLUTION TB Bank Loan 2.405% 01/23/14		02/18/2009	Wachovia Capital Markets	12/31/2009	Redemption	10,227	5,625	10,227	5,981		356		356			4,246	4,246	64	
LN3194-71-6	BL WEST CORP TLB Bank Loan 2.608% 12/24/13		02/09/2009	Barclays Capital, Inc.	12/29/2009	Redemption	20,356	16,081	20,356	16,446		364		364			3,910	3,910	218	
LN3204-58-0	BL METRO PCS TLB BL METRO PCS TLB 3.301% 11/03/13		01/21/2009	JP Morgan Securities, Inc.	05/15/2009	JP Morgan Securities, Inc.	488,517	422,567	451,878	426,703		4,136		4,136			25,175	25,175	3,985	
LN3204-58-0	BL METRO PCS TLB BL METRO PCS TLB 3.301% 11/03/13		01/21/2009	JP Morgan Securities, Inc.	03/31/2009	Redemption	11,483	9,933	11,483	9,961		28		28			1,522	1,522	13	
LN3230-10-6	SUNGARD DATA SYSTEMS INC SUNGARD DATA SYSTEMS INC 3.897% 02/28/14		01/22/2009	JP Morgan Securities, Inc.	12/08/2009	JP Morgan Securities, Inc.	500,000	376,250	469,031	397,808		21,558		21,558			71,223	71,223	23,039	
LN3237-17-6	Consolidate Container Co 0.078% 03/28/14		06/05/2009	Deutsche Bank Securities, Inc.	12/31/2009	Redemption	3,827	3,310	3,827	3,345		35		35			481	481	32	
LN3246-74-8	Harland Clarke Holdings Bank Loan 0.034% 06/30/14		05/26/2009	CIBC World Markets Corp.	12/31/2009	Redemption	9,542	7,538	9,542	7,642		104		104			1,900	1,900	122	
LN3249-94-0	EDUCATION MGT Bank Loan 2.063% 06/01/13		02/13/2009	Citigroup Global Markets, Inc.	11/03/2009	Deutsche Bank Securities, Inc.	793,723	681,610	738,163	698,470		16,860		16,860			39,693	39,693	12,992	
LN3249-94-0	EDUCATION MGT Bank Loan 2.063% 06/01/13		02/13/2009	Citigroup Global Markets, Inc.	09/30/2009	Redemption	6,277	5,390	6,277	5,454		63		63			823	823	2,289	
LN3281-04-2	Pinnacle Foods Finance Bank Loan 2.985% 04/02/14		06/02/2009	Morgan Stanley & Co., Inc.	12/31/2009	Redemption	2,672	2,385	2,672	2,407		22		22			265	265	20	
LN3286-03-3	BERRY PLASTICS Bank Loans 2.254% 04/03/15		07/27/2009	Citigroup Global Markets	12/31/2009	Redemption	2,046	1,739	2,046	1,753		14		14			293	293	9	
LN3291-41-3	ANTERO RESOURCES BANK LOAN 2.375% 04/12/14		09/10/2009	Barclays Capital, Inc.	11/17/2009	Redemption	300,000	226,125	300,000	231,083		4,958		4,958			68,917	68,917	2,434	
LN3291-93-4	HCA Inc HCA INC 2.533% 11/18/13		01/16/2009	Credit Suisse First Boston	11/04/2009	Banc of America Securities	500,000	405,000	461,250	418,626		13,626		13,626			42,624	42,624	14,232	
LN3331-09-4	TRW AUTOMOTIVE Bank Loans 3.819% 02/09/14		07/31/2009	Various	12/31/2009	Redemption	1,000,000	905,550	1,000,000	912,823		7,273		7,273			87,177	87,177	19,229	
LN3343-09-9	Michaels Stores Inc Bank Loan 2.562% 10/31/13		05/13/2009	Deutsche Bank Securities, Inc.	10/30/2009	Redemption	5,128	3,897	5,128	3,973		76		76			1,155	1,155	32	
LN3343-09-9	Michaels Stores Inc Bank Loan 2.562% 10/31/13		05/13/2009	Deutsche Bank Securities, Inc.	11/30/2009	Tax Free Exchange	570,759	433,777	447,249	447,249		13,472		13,472					7,919	

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

SCHEDULE D - PART 5

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

1 CUSIP Identifi- cation	2 Description	3 For- eign	4 Date Acquired	5 Name of Vendor	6 Disposal Date	7 Name of Purchaser	8 Par Value (Bonds) or Number of Shares (Stock)	9 Actual Cost	10 Consid- eration	11 Book/ Adjusted Carrying Value at Disposal	Change in Book/Adjusted Carrying Value					17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Interest and Dividends Received During Year	21 Paid for Accrued Interest and Dividends
											12 Unrealized Valuation Increase/ (Decrease)	13 Current Year's (Amort- ization)/ Accretion	14 Current Year's Other Than Temporary Impairment Recognized	15 Total Change in Book/ Adjusted Carrying Value (12 + 13 - 14)	16 Total Foreign Exchange Change in Book/ Adjusted Carrying Value					
LN3385-88-4	Rite Aid Corp Bank Loans 1.148% 06/04/14		04/30/2009	Citigroup Global Markets	12/31/2009	Redemption	100.0000	9,470	7,860	9,470	7,969						1,501	1,501	133	
LN3411-16-9	ASURION CORP Bank Loan 3.244% 07/07/14		03/02/2009	Banc of America Securities	12/31/2009	Redemption	100.0000	3,750	2,831	3,750	2,952		109			109	798	798	48	
LN3411-40-9	BLCOMMUNITYHLTH PRIVATE PLACEMENT 3.098% 07/25/14		01/01/2009	Various	06/17/2009	Banc of America Securities	1,963,889	1,587,528	1,796,959	1,644,482	1,644,482		56,954			56,954	152,477	152,477	38,878	7,973
LN3411-40-9	BLCOMMUNITYHLTH PRIVATE PLACEMENT 3.098% 07/25/14		01/01/2009	Credit Suisse First Boston	04/03/2009	Redemption	100.0000	36,111	29,972	36,111	30,306		334			334	5,805	5,805	315	299
LN3478-23-4	CONSOLIDATED COM Bank Loans 2.750% 12/31/14		06/12/2009	Wachovia Capital Markets	11/02/2009	Wells Fargo Brokerage Svc.	525,000	450,188	481,688	454,450	454,450		4,262			4,262	27,238	27,238	2,536	
LN3522-96-5	ALLISON TRANS Bank Loans 6.302% 08/07/14		05/28/2009	Citigroup Global Markets Deutsche Bank Securities, Inc.	09/30/2009	Redemption	100.0000	3,261	2,519	3,261	2,539		20			20	722	722	10	
LN3532-96-4	AEROFLEX INC 3.562% 08/15/14 First Data Corporation Bank Loan		07/20/2009		10/15/2009	Redemption	100.0000	9,073	7,758	9,073	7,798		40			40	1,275	1,275	49	
LN3605-19-0	1.863% 09/24/14 CATALINA MKTG Bank Loans 2.987%		04/30/2009	Credit Suisse First Boston	12/31/2009	Redemption	100.0000	11,421	8,509	11,421	8,677		168			168	2,744	2,744	135	
LN3633-92-9	10/11/14 CATALINA MKTG Bank Loans 2.987%		02/23/2009	Morgan Stanley & Co., Inc.	11/03/2009	RBS Greenwich Capital Svc.	559,179	447,343	525,628	462,996	462,996		15,653			15,653	62,632	62,632	15,765	
LN3633-92-9	10/11/14 CATALINA MKTG Bank Loans 2.987%		02/23/2009	Morgan Stanley & Co., Inc.	09/18/2009	Redemption	100.0000	100,821	80,657	100,821	82,899		2,242			2,242	17,922	17,922	2,406	
LN3634-53-9	CDW Corp Bank Loan 4.234% 10/12/14 NUVEEN INVESTM Bank Loans 3.281%		05/13/2009	Barclays Capital, Inc. Deutsche Bank Securities, Inc.	12/31/2009	Redemption	100.0000	3,214	2,217	3,214	2,285		67			67	929	929	52	
LN3647-53-1	11/13/14 SEQUA CORP Bank Loan 3.887% 12/03/14		06/24/2009		08/11/2009	Redemption	100.0000	44,648	34,156	44,648	34,299		143			143	10,349	10,349		
LN3684-91-4			01/30/2009	Citigroup Global Markets	05/06/2009	Redemption	100.0000	1,029	685	1,029	695		10			10	335	335	5	
LN3764-54-2	BL FED MOGUL STR 2.167% 12/27/14 BL FED MOGUL STR Bank Loans 2.167%		06/11/2009	Citigroup Global Markets	12/31/2009	Redemption	100.0000	3,165	2,160	3,165	2,206		46			46	958	958	28	
LN3764-58-3	12/27/15 SOLUTIONIA INC Bank Loans 7.151%		06/11/2009	Citigroup Global Markets Deutsche Bank Securities, Inc.	09/30/2009	Redemption	100.0000	1,582	1,080	1,582	1,090		10			10	492	492	2	
LN3775-66-2	02/28/14 BL CALPINE TLB Bank Loan 3.135%		06/18/2009		12/31/2009	Redemption	100.0000	130,380	119,949	130,380	120,485		535			535	9,895	9,895	2,260	
LN3782-14-8	03/29/14 BL CALPINE TLB Bank Loan 3.135%		05/06/2009	Various	12/31/2009	Redemption	100.0000	19,002	16,178	19,002	16,307		128			128	2,695	2,695	236	
LN3782-14-8	03/29/14 DEX MEDIA INC Bank Loans 0.000%		05/06/2009	Various	10/21/2009	Tax Free Exchange JP Morgan Securities, Inc.	2,070,000	1,564,643	1,620,335	1,620,335	1,620,335		55,692			55,692			55,286	
LN3907-27-3	10/24/14 FOX ACQUISITION SUB LLC Bank Loans		06/24/2009	JP Morgan Securities, Inc. Deutsche Bank Securities, Inc.	06/30/2009	Redemption	100.0000	1,000,000	846,250	825,000	846,250						(21,250)	(21,250)		
LN4025-71-1	0.080% 07/14/15 Freescale Semiconductor Inc 12.500%		07/08/2009		12/30/2009	Redemption	100.0000	3,916	2,965	3,916	2,988		24			24	928	928	46	
LN4389-26-5	12/15/14 BL NALCO CO BANK LOAN 6.125% 05/13/16		03/17/2009	Taxable Exchange Deutsche Bank Securities, Inc.	12/01/2009	Deutsche Bank Securities, Inc.	13,851	6,995	13,851	7,226	7,226		231			231	6,625	6,625	813	10
LN4679-57-4	BL NALCO CO BANK LOAN 6.125% 05/13/16		05/06/2009	Deutsche Bank Securities, Inc.	09/30/2009	Redemption	100.0000	1,119,375	1,091,391	1,140,363	1,088,349		(3,042)			(3,042)	52,014	52,014	26,377	
LN4679-57-4	BL NALCO CO BANK LOAN 6.125% 05/13/16		05/06/2009	Deutsche Bank Securities, Inc.	10/01/2009	Redemption	100.0000	5,625	5,484	5,625	5,469		(15)			(15)	156	156	7,154	
LN4722-32-5	ASHLAND INC BANK LOAN 0.000% 05/13/14		05/22/2009	Banc of America Securities	06/24/2009	Citigroup Global Markets	1,142,100	1,128,888	1,152,093	1,129,136	1,129,136		247			247	22,958	22,958	2,718	
LN4722-32-5	ASHLAND INC BANK LOAN 0.000% 05/13/14		05/22/2009	Banc of America Securities	06/30/2009	Redemption	100.0000	72,900	72,262	72,900	72,272		10			10	628	628	1,575	
PP3X32-TR-6	BRSP LLC Bank Loans 7.500% 06/30/14		06/23/2009	Barclays Capital, Inc.	12/07/2009	Redemption	100.0000	10,923	10,268	10,923	10,275		7			7	648	648	341	
PP3X32-TS-4	Quebecor Bank Loans 9.163% 06/30/12		06/29/2009	Credit Suisse First Boston	10/30/2009	Redemption	100.0000	1,065	959	1,065	967		8			8	99	99	4	
PP3X32-UV-5	CASELLA WASTE 0.304% 03/31/14 OMEGA LEASING LLC PRIVATE PLACEMENT		07/01/2009	Banc of America Securities	12/31/2009	Redemption	100.0000	1,900	1,796	1,900	1,798		2			2	102	102	37	
PP4F1E-AE-9	5.980% 07/16/16		06/03/2009	Royal Bank of Scotland	10/16/2009	Redemption	100.0000	115,628	115,628	115,628	115,628								1,709	

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

**SCHEDULE D - PART 5**

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

1 CUSIP Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Disposal Date	7 Name of Purchaser	8 Par Value (Bonds) or Number of Shares (Stock)	9 Actual Cost	10 Consideration	11 Book/Adjusted Carrying Value at Disposal	Change in Book/Adjusted Carrying Value					17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Interest and Dividends Received During Year	21 Paid for Accrued Interest and Dividends		
											12 Unrealized Valuation Increase/(Decrease)	13 Current Year's (Amortization)/Accretion	14 Current Year's Other Than Temporary Impairment Recognized	15 Total Change in Book/Adjusted Carrying Value (12 + 13 - 14)	16 Total Foreign Exchange Change in Book/Adjusted Carrying Value							
000000-00-0	BL LEAR EXIT TLB PRIVATE PLACEMENT 3.64% 11/05/14		10/21/2009	JP Morgan Securities, Inc.	11/25/2009	Redemption	99,000		9,591	9,592												
380956-AA-0	GOLDCORP INC 144A 2.00% 08/01/14	A	06/02/2009	JP Morgan Securities, Inc.		Various	200,000	200,000	199,738	200,000				.1		.1						
878742-AK-1	TECKCOMINCO LTD 144a 10.25% 05/15/16	A	05/06/2009	JP Morgan Securities, Inc.	08/19/2009	Tax Free Exchange	370,000	370,925	370,902	370,902											10,640	316
878742-AN-5	TECKCOMINCO LTD 144a 10.75% 05/15/19	A	05/05/2009	JP Morgan Securities, Inc.	05/06/2009	JP Morgan Securities, Inc.	370,000	351,104	376,475	351,104											25,371	331
887147-AD-8	TIMBERWEST FOREST CRP 9.00% 02/11/14	C	02/06/2009	Direct	12/07/2009	BMO Capital	155,208	195,689	214,901	226,830							44,447				11,929	8,042
887147-AD-8	TIMBERWEST FOREST CRP 9.00% 02/11/14	C	10/15/2009	Interest Capitalization	12/07/2009	BMO Capital	2,992	2,406	4,143	4,373							857				(230)	627
25243Y-AN-9	DIAGEO CAPITAL PLC DIAGEO CAP PLC 7.375 01/15/14	F	02/12/2009	Credit Suisse First Boston	03/18/2009	First Tennessee Bank	5,000,000	5,665,200	5,430,050	5,654,310											(224,260)	155,694
45687A-AD-4	INGERSOLL-RAND GL HLD CO BASIC 4.500% 04/15/12	F	03/31/2009	JP MORGAN EQUITIES	04/03/2009	JP MORGAN EQUITIES	50,000	50,000	58,875	50,000											8,875	13
LN3623-11-0	Flextronics Semiconductor 2.447% 10/01/14	F	06/15/2009	Various	09/21/2009	Barclays Capital, Inc.	688,249	589,269	619,424	594,037											4,768	25,387
LN3623-11-0	Flextronics Semiconductor 2.447% 10/01/14	F	06/15/2009	Citigroup Global Markets	08/18/2009	Redemption 100.0000	1,751	1,506	1,751	1,513											7	238
PP326D-8Z-9	CEMEX ESPANA FIN PRIVATE PLACEMENT 8.910% 02/14/14	R	09/01/2009	Tax Free Exchange	12/15/2009	Redemption 100.0000	6,979,464	6,446,299	6,979,464	6,459,584											13,284	519,880
LN4328-21-4	Lyondell Chemical Company		05/14/2009	UBS Warburg LLC	07/07/2009	Jpmorgan Securities	1,000,000	1,020,000	1,030,000	1,014,944											(5,056)	15,050
<b>8399999. Bonds - Industrial and Miscellaneous (Unaffiliated)</b>							171,484,188	171,427,085	173,118,238	171,738,906				338,414	71,901	266,513	45,304	1,379,325	1,424,629	5,866,262	665,491	
<b>8399998. Total - Bonds</b>							211,190,932	212,389,707	212,948,211	211,569,141				(793,975)	71,901	(865,876)	45,304	1,379,063	1,424,367	6,739,636	743,633	
000000-00-0	Georgia Gulf Preferred		08/17/2009	Tax Free Exchange	10/01/2009	Tax Free Exchange	62,554,000	305,759	305,759	305,759												
<b>8499999. Preferred Stocks - Industrial and Miscellaneous (Unaffiliated)</b>								305,759	305,759	305,759												
<b>8999998. Total - Preferred Stocks</b>								305,759	305,759	305,759												
000000-00-0	GGC restricted common stock		10/01/2009	Tax Free Exchange	10/29/2009	Tax Free Exchange	65,346,000	319,412	319,412	319,412												
11133T-10-3	BROADRIDGE FINANCIAL SOLUTIONS		02/12/2009	Various	05/08/2009	Various	19,500,000	268,115	372,633	268,115											104,518	1,365
125581-80-1	CIT GROUP INC		12/10/2009	Taxable Exchange	12/29/2009	Direct	1,000	.30	.25	.30											(.5)	(.5)
127055-10-1	CABOT CORP		07/17/2009	Various	12/10/2009	Various	36,200,000	459,944	861,293	459,944											401,349	10,332
163893-10-0	Chemtura Corp		03/04/2009	Direct Trading	12/23/2009	Various	117,000,000	56,230	114,125	5,558											50,673	(50,673)
268176-10-2	DYNEGY INC-CL A COMMON		01/05/2009	Various	06/12/2009	Various	49,000,000	112,462	108,202	112,462											108,568	108,568
346233-10-9	FORESTAR REAL ESTATE GROUP COMMON		03/03/2009	Buckingham Research	09/22/2009	Various	1,200,000	7,852	20,226	7,852											(4,260)	(4,260)
370334-10-4	GENERAL MILLS INC		06/18/2009	Various	11/24/2009	Various	9,000,000	482,414	606,326	482,414											123,912	123,912
373200-30-2	GEORGIA GULF CORP		10/29/2009	Tax Free Exchange	12/30/2009	Various	33,808,000	165,035	530,026	165,035											364,991	364,991
428236-10-3	HEWLETT-PACKARD CO		03/16/2009	Various	11/30/2009	Various	12,300,000	409,869	568,375	409,869											158,506	158,506
440694-30-5	HORSEHEAD HOLDING CORP COMMON		05/15/2009	Various	12/28/2009	Various	137,400,000	615,007	1,626,749	615,007											1,011,742	1,011,742
447011-10-7	HUNTSMAN CORP COMMON		03/26/2009	Various	12/31/2009	Various	162,700,000	486,072	1,573,135	486,072											1,087,064	1,087,064
521865-20-4	Lear Corp		11/18/2009	Tax Free Exchange	12/29/2009	Various	13,684,000	201,647	887,630	201,647											685,983	685,983
549271-10-4	LUBRIZOL COMMON		03/17/2009	Various	06/29/2009	Various	33,500,000	1,002,979	1,528,291	1,002,979											525,313	525,313
582411-10-4	MCMORAN EXPLORATION CO COMMON		06/30/2009	Various	12/30/2009	Various	44,300,000	257,713	376,609	257,713											118,897	118,897
582839-10-6	MEAD JOHNSON NUTRITION CO-A		02/10/2009	JP Morgan Securities, Inc.	04/08/2009	Bear Stearns & Co., Inc.	3,000,000	72,000	81,404	72,000											9,404	9,404
583334-10-7	MEADWESTVACO CORP COMMON		05/11/2009	Various	12/15/2009	Various	35,800,000	495,478	495,478	495,478											435,725	435,725
804137-10-7	SAUER-DANFOSS INC		09/03/2009	Various	12/04/2009	Various	28,800,000	144,584	264,675	144,584											120,090	120,090
88732J-10-8	Time Warner Cable - A		01/01/2009	Direct	01/09/2009	Direct	.000	.1	.19	.1											.18	.18
88732J-10-8	Time Warner Cable - A		01/01/2009	Direct	03/13/2009	Tax Free Exchange	255,000	5,077	255	5,077											(4,822)	(4,822)
88732J-20-7	Time Warner Cable - A		03/13/2009	Tax Free Exchange	03/16/2009	Credit Suisse First Boston	85,000	255	2,208	255											1,953	1,953
88732J-20-7	Time Warner Cable - A		03/13/2009	Tax Free Exchange	03/13/2009	No Broker	170,000															
890516-10-7	Tootsie Roll		03/06/2009	Stock Dividend	04/09/2009	Direct	.000															
931422-10-9	WALGREEN CO		01/15/2009	Various	10/19/2009	Various	1,300,000	35,449	51,774	35,449											16,325	16,325
257559-10-4	DOMTAR CORP	A	03/05/2009	Direct Trading	06/11/2009	Tax Free Exchange	13,000,000	7,959	56,707	7,959											48,748	48,748
257559-20-3	DOMTAR CORP	A	06/11/2009	Tax Free Exchange	06/11/2009	Cash Adjustment	.000	.9	.3	.9											(.6)	(.6)
257559-20-3	DOMTAR CORP	A	06/11/2009	Tax Free Exchange	06/11/2009	No Broker	566,524,000															
71644E-10-2	PETRO-CANADA COMMON	A	01/23/2009	Weeden & Company	07/31/2009	Pershing/CJS Securities	1,000,000	22,230	41,672	22,230											19,442	19,442
887147-11-4	TIMBERWEST FOREST CRP RIGHT	C	01/05/2009	Spin Off	02/06/2009	Direct	245,900,000	77,930	67,792	67,653											(10,277)	139

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

**SCHEDULE D - PART 5**

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

1 CUSIP Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Disposal Date	7 Name of Purchaser	8 Par Value (Bonds) or Number of Shares (Stock)	9 Actual Cost	10 Consid- eration	11 Book/ Adjusted Carrying Value at Disposal	Change in Book/Adjusted Carrying Value					17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Interest and Dividends Received During Year	21 Paid for Accrued Interest and Dividends		
											12 Unrealized Valuation Increase/ (Decrease)	13 Current Year's (Amort- ization)/ Accretion	14 Current Year's Other Than Temporary Impairment Recognized	15 Total Change in Book/ Adjusted Carrying Value (12 + 13 - 14)	16 Total Foreign Exchange Change in Book/ Adjusted Carrying Value							
887147-20-5	TIMBERWEST FOREST CRP	C	01/01/2009	Direct Trading	01/05/2009	Spin Off	0.000	385	385	385												
887147-20-5	TIMBERWEST FOREST CRP	C	05/01/2009	Various	05/11/2009	Tax Free Exchange	91,500.000	213,828	765,235	226,101					12,273	539,135	551,408					
893460-10-7	TRANSALTA CORP	C	06/30/2009	Various	09/03/2009	Various	52,700.000	943,719	1,034,028	1,004,098					60,378	29,930	90,308					11,544
69143X-20-8	Tyco International LTD	F	01/22/2009	McAdams, Wright, Ragen, Inc.	03/17/2009	Tax Free Exchange	1,000.000	21,059	37,174	21,059						16,115	16,115					
9099999. Common Stocks - Industrial and Miscellaneous (Unaffiliated)								6,884,744	12,827,591	6,896,447			50,673	(50,673)		62,374	5,931,149	5,993,523		112,906		
9799998. Total - Common Stocks								6,884,744	12,827,591	6,896,447			50,673	(50,673)		62,374	5,931,149	5,993,523		112,906		
9899999. Total - Preferred and Common Stocks								7,190,503	13,133,350	7,202,206			50,673	(50,673)		62,374	5,931,149	5,993,523		112,906		
9999999 - Totals								219,580,210	226,081,561	218,771,347			(793,975)	122,574	(916,549)	107,678	7,310,212	7,417,890		6,852,542		743,633

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

**SCHEDULE D - PART 6 - SECTION 1**

Valuation of Shares of Subsidiary, Controlled or Affiliated Companies

1 CUSIP Identification	2 Description, Name of Subsidiary, Controlled or Affiliated Company	3 Foreign	4 NAIC Company Code or Alien Insurer Identification Number	5 NAIC Valuation Method (See SVO Purposes and Procedures Manual)	6 Do Insurer's Assets Include Intangible Assets Connected with Holding of Such Company's Stock?	7 Total Amount of Such Intangible Assets	8 Book/Adjusted Carrying Value	Stock of Such Company Owned by Insurer on Statement Date	
								9 Number of Shares	10 % of Outstanding
<b>0999999. Total Preferred Stocks</b>								XXX	XXX
000000-00-0	First Symetra Natl Life Ins Co of NY		78417	4CIB1	NO		62,009,786	20,000,000	100.0
000000-00-0	Symetra National Life Insurance Co		90581	4CIB1	NO		10,243,586	20,000,000	100.0
<b>1299999. Common Stock - U.S. Life Insurer</b>								XXX	XXX
084670-20-7	BERKSHIRE HATHAWAY INC			4CIA1	NO		72,253,372	1,444,000	
<b>1799999. Common Stock - Other Affiliates</b>								XXX	XXX
							4,744,984		
<b>1899999. Total Common Stocks</b>								XXX	XXX
							76,998,356		
<b>1999999 - Totals</b>								XXX	XXX

1. Amount of insurer's capital and surplus from the prior period's statutory statement reduced by any admitted EDP, goodwill and net deferred tax assets included therein \$ 1,136,171,531

2. Total amount of intangible assets nonadmitted \$ 15,319,753

**SCHEDULE D - PART 6 - SECTION 2**

1 CUSIP Identification	2 Name of Lower-Tier Company	3 Name of Company Listed in Section 1 Which Controls Lower-Tier Company	4 Total Amount of Intangible Assets Included in Amount Shown in Column 7, Section 1	Stock in Lower-Tier Company Owned Indirectly by Insurer on Statement Date	
				5 Number of Shares	6 % of Outstanding
<b>NONE</b>					
<b>0399999 - Total</b>				XXX	XXX

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

**SCHEDULE DA - PART 1**

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

1	2	Codes		5	6	7	8	Change in Book/Adjusted Carrying Value				13	14	Interest					21	
		3	4					9	10	11	12			15	16	17	18	19		20
CUSIP Identification	Description	Code	Foreign	Date Acquired	Name of Vendor	Maturity Date	Book/Adjusted Carrying Value	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Par Value	Actual Cost	Amount Due and Accrued Dec. 31 of Current Year on Bonds not in Default	Non-Admitted Due and Accrued	Rate of	Effective Rate of	When Paid	Amount Received During Year	Paid for Accrued Interest
0399999	Total - U.S. Government Bonds															XXX	XXX	XXX		
1099999	Total - All Other Government Bonds															XXX	XXX	XXX		
1799999	Total - U.S. States, Territories and Possessions Bonds															XXX	XXX	XXX		
2499999	Total - U.S. Political Subdivisions of States, Territories and Possessions Bonds															XXX	XXX	XXX		
3199999	Total - U.S. Special Revenues Bonds															XXX	XXX	XXX		
3899999	Total - Industrial and Miscellaneous Bonds (Unaffiliated)															XXX	XXX	XXX		
4199999	Total - Credit Tenant Loans															XXX	XXX	XXX		
4899999	Total - Hybrid Securities															XXX	XXX	XXX		
7799999	Total - Issuer Obligations															XXX	XXX	XXX		
7899999	Total - Single Class Mortgage-Backed/Asset-Backed Securities															XXX	XXX	XXX		
7999999	Total - Defined Multi-Class Residential Mortgage-Backed Securities															XXX	XXX	XXX		
8099999	Total - Other Multi-Class Residential Mortgage-Backed Securities															XXX	XXX	XXX		
8199999	Total - Defined Multi-Class Commercial Mortgage-Backed Securities															XXX	XXX	XXX		
8299999	Total - Other Multi-Class Commercial Mortgage-Backed/Asset-Backed Securities															XXX	XXX	XXX		
8399999	Total Bonds															XXX	XXX	XXX		
8699999	Total - Parent, Subsidiaries and Affiliates											XXX				XXX	XXX	XXX		
299920-43-9	EVERGREEN INST TREAS MI OVERNIGHT SWEEP	SD		01/01/2009	Various		50,000						50,000			0.000	0.000	Monthly		
481200-66-2	JP MORGAN OVERNIGHT SWEEP			12/31/2009	Various		2,023,215						2,023,215			0.000	0.000	Monthly	509	
481200-67-0	JP MORGAN OVERNIGHT SWEEP			12/31/2009	Various		82,527,415						82,527,415			0.000	0.000	Monthly	58,992	
481200-67-0	JP MORGAN OVERNIGHT SWEEP			12/31/2009	Various		10,320,000						10,320,000			0.000	0.000	Monthly	141,294	
8899999	Exempt Money Market Mutual Funds						94,920,630					XXX	94,920,630			XXX	XXX	XXX	200,795	
9199999	Totals						94,920,630					XXX	94,920,630			XXX	XXX	XXX	200,795	

E17

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

**SCHEDULE DB - PART A - SECTION 1**

Showing all Options, Caps, Floors and Insurance Futures Options Owned December 31 of Current Year

1	2	3	4	5	6	7	8	9	10	11	12	13	14
Description	Number of Contracts or Notional Amount	Date of Maturity, Expiry or Settlement	Strike Price, Rate or Index	Date of Acquisition	Exchange or Counterparty	Cost/Option Premium	Book Value	*	Statement Value	Fair Value	Increase/ (Decrease) by Adjustment	Used to Adjust Basis of Hedged Item	Other Investment/ Miscellaneous Income
SP500 INDEX 12/30/2010 Strike 105 SPI0TC5J1	30,000,000	12/30/2010	105.000000	08/20/2009	US - CBOE	2,370,000	2,370,000		1,776,506	1,776,506			
0399999. Subtotal - Call Options - Other						2,370,000	2,370,000	XXX	1,776,506	1,776,506			
0499999. Subtotal - Call Options						2,370,000	2,370,000	XXX	1,776,506	1,776,506			
0899999. Subtotal - Put Options								XXX					
1299999. Subtotal - Caps								XXX					
1699999. Subtotal - Floors								XXX					
2099999. Subtotal - Insurance Futures Call Options								XXX					
2499999. Subtotal - Insurance Futures Put Options								XXX					
2599999. Subtotal - Hedging								XXX					
2799999. Subtotal - Other						2,370,000	2,370,000	XXX	1,776,506	1,776,506			
9999999 - Totals						2,370,000	2,370,000	XXX	1,776,506	1,776,506			

**SCHEDULE DB - PART A - SECTION 2**

Showing all Options, Caps, Floors and Insurance Futures Options Acquired During Current Year

1	2	3	4	5	6	7
Description	Number of Contracts or Notional Amount	Date of Maturity, Expiry or Settlement	Strike Price, Rate or Index	Date of Acquisition	Exchange or Counterparty	Cost/Option Premium
SP500 INDEX 12/30/2010 Strike 105 SPI0TC5J1	30,000,000	12/30/2010	105.000000	08/20/2009	US - CBOE	2,370,000
0399999. Subtotal - Call Options - Other						2,370,000
0499999. Subtotal - Call Options						2,370,000
0899999. Subtotal - Put Options						
1299999. Subtotal - Caps						
1699999. Subtotal - Floors						
2099999. Subtotal - Insurance Futures Call Options						
2499999. Subtotal - Insurance Futures Put Options						
2599999. Subtotal - Hedging						
2799999. Subtotal - Other						2,370,000
9999999 - Totals						2,370,000

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

**SCHEDULE DB - PART A - SECTION 3**

Showing all Owned Options, Caps, Floors and Insurance Futures Options Terminated During Current Year

1 Description	2 Number of Contracts or Notional Amount	3 Date of Maturity, Expiry or Settlement	4 Strike Price, Rate or Index	5 Date of Acquisition	6 Exchange or Counterparty	7 Cost/Option Premium	8 Indicate Exercise, Expiration, Maturity or Sale	9 Termination Date	10 Book Value	11 *	12 Consideration Received on Terminations	13 Increase/ (Decrease) by Adjustment	Gain/(Loss) on Termination			17 Other Investment/ Miscellaneous Income
													14 Recognized	15 Used to Adjust Basis of Hedged Item	16 Deferred	
SP500 INDEX 12/31/2009 Strike 948.41 SPI0TC9J7	20,000,000	12/31/2009	948.41	08/18/2008	US - CBOE	1,424,000	Closing Sale	12/31/2009	1,424,000		3,690,839		2,266,839			
0399999. Subtotal - Call Options - Other						1,424,000	XXX	XXX	1,424,000	XXX	3,690,839		2,266,839			
0499999. Subtotal - Call Options						1,424,000	XXX	XXX	1,424,000	XXX	3,690,839		2,266,839			
0899999. Subtotal - Put Options							XXX	XXX		XXX						
1299999. Subtotal - Caps							XXX	XXX		XXX						
1699999. Subtotal - Floors							XXX	XXX		XXX						
2099999. Subtotal - Insurance Futures Call Options							XXX	XXX		XXX						
2499999. Subtotal - Insurance Futures Put Options							XXX	XXX		XXX						
2599999. Subtotal - Hedging							XXX	XXX		XXX						
2799999. Subtotal - Other						1,424,000	XXX	XXX	1,424,000	XXX	3,690,839		2,266,839			
9999999 - Totals						1,424,000	XXX	XXX	1,424,000	XXX	3,690,839		2,266,839			

**SCHEDULE DB - PART B - SECTION 1**

Showing all Options, Caps, Floors and Insurance Futures Options Written and In-Force December 31 of Current Year

1 Description	2 Number of Contracts or Notional Amount	3 Date of Maturity, Expiry or Settlement	4 Strike Price, Rate or Index	5 Date of Issuance/ Purchase	6 Exchange or Counterparty	7 Consideration Received	8 Book Value	9 *	10 Statement Value	11 Fair Value	12 Increase/ (Decrease) by Adjustment	13 Used to Adjust Basis	14 Other Investment/ Miscellaneous Income
<b>NONE</b>													
9999999 - Totals								XXX					



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

**N O N E**

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

**N O N E**

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

**N O N E**

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

**N O N E**

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

**N O N E**

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

**N O N E**

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

**N O N E**

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

**N O N E**

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

**SCHEDULE DB - PART E - SECTION 1**

Showing Counterparty Exposure for Derivative Instruments Open December 31 of Current Year

1 Description Counterparty or Exchange Traded	2 Master Agreement (Y or N)	3 Fair Value of Acceptable Collateral	Statement Value			Fair Value			10 Potential Exposure	11 Off-Balance Sheet Exposure
			4 Contracts Statement Value >0	5 Contracts Statement Value <0	6 Exposure Net of Collateral	7 Contracts Fair Value >0	8 Contracts Fair Value <0	9 Exposure Net of Collateral		
0199999 - Aggregate Sum of Exchange Traded Derivatives	XXX		1,776,506		1,776,506	1,776,506		1,776,506		
0899999 - Totals			1,776,506		1,776,506	1,776,506		1,776,506		



**SCHEDULE E - PART 2 - CASH EQUIVALENTS**

Show Investments Owned December 31 of 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
<b>NONE</b>							
8699999 - Total Cash Equivalents							

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

**SCHEDULE E - PART 3 - SPECIAL DEPOSITS**

States, Etc.	1 Type of Deposit	2 Purpose of Deposit	Deposits For the Benefit of All Policyholders		All Other Special Deposits	
			3 Book/Adjusted Carrying Value	4 Fair Value	5 Book/Adjusted Carrying Value	6 Fair Value
1. Alabama	AL					
2. Alaska	AK					
3. Arizona	AZ					
4. Arkansas	AR					
5. California	CA					
6. Colorado	CO					
7. Connecticut	CT					
8. Delaware	DE					
9. District of Columbia	DC					
10. Florida	FL					
11. Georgia	GA	0 Life Insurance			88,696	99,516
12. Hawaii	HI					
13. Idaho	ID					
14. Illinois	IL					
15. Indiana	IN					
16. Iowa	IA					
17. Kansas	KS					
18. Kentucky	KY					
19. Louisiana	LA					
20. Maine	ME					
21. Maryland	MD					
22. Massachusetts	MA					
23. Michigan	MI					
24. Minnesota	MN					
25. Mississippi	MS					
26. Missouri	MO					
27. Montana	MT					
28. Nebraska	NE					
29. Nevada	NV					
30. New Hampshire	NH					
31. New Jersey	NJ					
32. New Mexico	NM	B Life Insurance			145,112	185,684
33. New York	NY					
34. North Carolina	NC	B Life Insurance			386,964	495,156
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	B Life Insurance			54,672	58,492
48. Washington	WA	B Life Insurance	4,964,582	6,172,066		
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					
58. Aggregate Alien and Other	OT	XXX	XXX			
59. Subtotal	XXX	XXX	4,964,582	6,172,066	675,444	838,848
DETAILS OF WRITE-INS						
5801.						
5802.						
5803.						
5898. Summary of remaining write-ins for Line 58 from overflow page	XXX	XXX				
5899. Totals (Lines 5801 thru 5803 plus 5898)(Line 58 above)	XXX	XXX				

## ALPHABETICAL INDEX

### ANNUAL STATEMENT BLANK

Analysis of Increase in Reserves During The Year .....	7
Analysis of Operations By Lines of Business .....	6
Asset Valuation Reserve Default Component .....	30
Asset Valuation Reserve Equity .....	32
Asset Valuation Reserve Replications (Synthetic) Assets .....	35
Asset Valuation Reserve .....	29
Assets .....	2
Cash Flow .....	5
Exhibit 1 - Part 1 - Premiums and Annuity Considerations for Life and Accident and Health Contracts .....	9
Exhibit 1 - Part 2 - Dividends and Coupons Applied, Reinsurance Commissions and Expense .....	10
Exhibit 2 - General Expenses .....	11
Exhibit 3 - Taxes, Licenses and Fees (Excluding Federal Income Taxes) .....	11
Exhibit 4 - Dividends or Refunds .....	11
Exhibit 5 - Aggregate Reserve for Life Contracts .....	12
Exhibit 5 - Interrogatories .....	13
Exhibit 5A - Changes in Bases of Valuation During The Year .....	13
Exhibit 6 - Aggregate Reserves for Accident and Health Contracts .....	14
Exhibit 7 - Deposit-Type Contracts .....	15
Exhibit 8 - Claims for Life and Accident and Health Contracts - Part 1 .....	16
Exhibit 8 - Claims for Life and Accident and Health Contracts - Part 2 .....	17
Exhibit of Capital Gains (Losses) .....	8
Exhibit of Life Insurance .....	25
Exhibit of Net Investment Income .....	8
Exhibit of Nonadmitted Assets .....	18
Exhibit of Number of Policies, Contracts, Certificates, Income Payable and Account Values .....	27
Five-Year Historical Data .....	22
Form for Calculating the Interest Maintenance Reserve (IMR) .....	28
General Interrogatories .....	20
Jurat Page .....	1
Liabilities, Surplus and Other Funds .....	3
Life Insurance (State Page) .....	24
Notes To Financial Statements .....	19
Overflow Page For Write-ins .....	53
Schedule A - Part 1 .....	E01
Schedule A - Part 2 .....	E02
Schedule A - Part 3 .....	E03
Schedule A - Verification Between Years .....	SI02
Schedule B - Part 1 .....	E04
Schedule B - Part 2 .....	E05
Schedule B - Part 3 .....	E06
Schedule B - Verification Between Years .....	SI02
Schedule BA - Part 1 .....	E07
Schedule BA - Part 2 .....	E08
Schedule BA - Part 3 .....	E09
Schedule BA - Verification Between Years .....	SI03
Schedule D - Part 1 .....	E10
Schedule D - Part 1A - Section 1 .....	SI05
Schedule D - Part 1A - Section 2 .....	SI08
Schedule D - Part 2 - Section 1 .....	E11
Schedule D - Part 2 - Section 2 .....	E12
Schedule D - Part 3 .....	E13
Schedule D - Part 4 .....	E14
Schedule D - Part 5 .....	E15
Schedule D - Part 6 - Section 1 .....	E16
Schedule D - Part 6 - Section 2 .....	E16
Schedule D - Summary By Country .....	SI04
Schedule D - Verification Between Years .....	SI03
Schedule DA - Part 1 .....	E17
Schedule DA - Verification Between Years .....	SI11

**ANNUAL STATEMENT BLANK (Continued)**

Schedule DB - Part A - Section 1 .....	E18
Schedule DB - Part A - Section 2 .....	E18
Schedule DB - Part A - Section 3 .....	E19
Schedule DB - Part A - Verification Between Years .....	SI12
Schedule DB - Part B - Section 1 .....	E19
Schedule DB - Part B - Section 2 .....	E20
Schedule DB - Part B - Section 3 .....	E20
Schedule DB - Part B - Verification Between Years .....	SI12
Schedule DB - Part C - Section 1 .....	E21
Schedule DB - Part C - Section 2 .....	E21
Schedule DB - Part C - Section 3 .....	E22
Schedule DB - Part C - Verification Between Years .....	SI13
Schedule DB - Part D - Section 1 .....	E22
Schedule DB - Part D - Section 2 .....	E23
Schedule DB - Part D - Section 3 .....	E23
Schedule DB - Part D - Verification Between Years .....	SI13
Schedule DB - Part E - Section 1 .....	E24
Schedule DB - Part E - Verification Between Years .....	SI13
Schedule DB - Part F - Section 1 .....	SI14
Schedule DB - Part F - Section 2 .....	SI15
Schedule E - Part 1 - Cash .....	E25
Schedule E - Part 2 - Cash Equivalents .....	E26
Schedule E - Part 3 - Special Deposits .....	E27
Schedule E - Verification Between Years .....	SI16
Schedule F .....	36
Schedule H - Accident and Health Exhibit - Part 1 .....	37
Schedule H - Part 2, Part 3 and Part 4 .....	38
Schedule H - Part 5 - Health Claims .....	39
Schedule S - Part 1 - Section 1 .....	40
Schedule S - Part 1 - Section 2 .....	41
Schedule S - Part 2 .....	42
Schedule S - Part 3 - Section 1 .....	43
Schedule S - Part 3 - Section 2 .....	44
Schedule S - Part 4 .....	45
Schedule S - Part 5 .....	46
Schedule S - Part 6 .....	47
Schedule T - Part 2 Interstate Compact .....	49
Schedule T - Premiums and Annuity Considerations .....	48
Schedule Y - Information Concerning Activities of Insurer Members of a Holding Company Group .....	50
Schedule Y - Part 2 - Summary of Insurer's Transactions With Any Affiliates .....	51
Summary Investment Schedule .....	SI01
Summary of Operations .....	4
Supplemental Exhibits and Schedules Interrogatories .....	52