



LIFE AND ACCIDENT AND HEALTH COMPANIES - ASSOCIATION EDITION

# ANNUAL STATEMENT

FOR THE YEAR ENDED DECEMBER 31, 2011  
OF THE CONDITION AND AFFAIRS OF THE

## Symetra National Life Insurance Company

NAIC Group Code 1129 1129 NAIC Company Code 90581 Employer's ID Number 91-1079693  
(Current) (Prior)

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

Country of Domicile United States of America

Incorporated/Organized 09/04/1979 Commenced Business 09/05/1979

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

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

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

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

Internet Website Address www.symetra.com

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

### OFFICERS

President Thomas Michael Marra Treasurer Colleen Mary Murphy  
Secretary David Seth Goldstein # Chief Actuary Tommie David Brooks

### OTHER

<u>Chantel Lee Balkovetz # Vice President</u>	<u>Glenn Allan Black # Vice President</u>	<u>Philippe Donald Bouvier II # Vice President</u>
<u>Jonathan Edward Curley # Executive Vice President</u>	<u>Colin Michael Elder Vice President</u>	<u>Lydia May Flora Vice President</u>
<u>Michael William Fry # Executive Vice President</u>	<u>John Eric Galaviz Vice President</u>	<u>Daniel Richard Guilbert # Executive Vice President</u>
<u>Sheridan Houston Hollender Vice President</u>	<u>Christine Ann Katzmar Holmes Senior Vice President</u>	<u>Kevin Daniel Knull # Senior Vice President</u>
<u>Richard George LaVoice # Executive Vice President</u>	<u>Brent Patrick Martonik # Vice President</u>	<u>Linda Corlett Mahaffey # Senior Vice President</u>
<u>Margaret Alice Meister Executive Vice President</u>	<u>Michael Fintan Murphy Vice President</u>	<u>James Dwyer Pirak # Senior Vice President</u>
<u>Richard Peter Smolinski # Vice President</u>	<u>Bridgette Nikko Takeuchi # Vice President</u>	<u>Dena Simone Thompson Vice President</u>

### DIRECTORS OR TRUSTEES

<u>Jonathan Edward Curley</u>	<u>Michael William Fry</u>	<u>David Seth Goldstein #</u>
<u>Daniel Richard Guilbert</u>	<u>Thomas Michael Marra</u>	<u>Margaret Alice Meister</u>

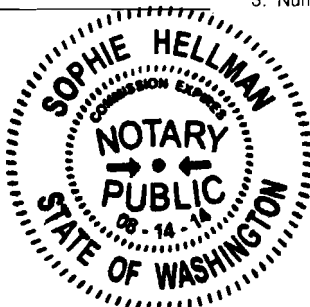
State of Washington SS:  
County of King

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

Thomas Michael Marra President	Margaret Alice Meister Chief Financial Officer	Colleen Mary Murphy Treasurer

Subscribed and sworn to before me this 24th day of February, 2012

- 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 2011 OF THE Symetra National 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) .....	15,065,943		15,065,943	16,425,572
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 (less \$ .....				
encumbrances) .....				
4.2 Properties held for the production of income (less				
\$ .....				
encumbrances) .....				
4.3 Properties held for sale (less \$ .....				
encumbrances) .....				
5. Cash (\$ .....355,736 , Schedule E - Part 1), cash equivalents				
(\$ ....., Schedule E - Part 2) and short-term				
investments (\$ .....16,532 , Schedule DA) .....	372,268		372,268	255,699
6. Contract loans (including \$ ..... premium notes) .....	165,086		165,086	168,334
7. Derivatives (Schedule DB) .....				
8. Other invested assets (Schedule BA) .....				
9. Receivables for securities .....	534,265		534,265	11,718
10. Securities lending reinvested collateral assets (Schedule DL) .....				
11. Aggregate write-ins for invested assets .....				
12. Subtotals, cash and invested assets (Lines 1 to 11) .....	16,137,562		16,137,562	16,861,323
13. Title plants less \$ ..... charged off (for Title insurers				
only) .....				
14. Investment income due and accrued .....	95,150		95,150	152,923
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection .....	3,007		3,007	3,383
15.2 Deferred premiums and agents' balances and installments booked but				
deferred and not yet due (including \$ .....				
earned but unbilled premiums) .....	45,266		45,266	46,403
15.3 Accrued retrospective premiums .....				
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers .....				
16.2 Funds held by or deposited with reinsured companies .....				
16.3 Other amounts receivable under reinsurance contracts .....				
17. Amounts receivable relating to uninsured plans .....				
18.1 Current federal and foreign income tax recoverable and interest thereon .....	10,382		10,382	
18.2 Net deferred tax asset .....	881,641	811,766	69,875	62,614
19. Guaranty funds receivable or on deposit .....	8,875		8,875	9,833
20. Electronic data processing equipment and software .....				
21. Furniture and equipment, including health care delivery assets				
(\$ ..... ) .....				
22. Net adjustment in assets and liabilities due to foreign exchange rates .....				
23. Receivables from parent, subsidiaries and affiliates .....				
24. Health care (\$ ..... ) and other amounts receivable .....				
25. Aggregate write-ins for other than invested assets .....				
26. Total assets excluding Separate Accounts, Segregated Accounts and				
Protected Cell Accounts (Lines 12 to 25) .....	17,181,883	811,766	16,370,117	17,136,479
27. From Separate Accounts, Segregated Accounts and Protected Cell				
Accounts .....				
28. Total (Lines 26 and 27) .....	17,181,883	811,766	16,370,117	17,136,479
<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)				
2501. Other Assets .....				
2502. ....				
2503. ....				
2598. Summary of remaining write-ins for Line 25 from overflow page .....				
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)				

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company

**LIABILITIES, SURPLUS AND OTHER FUNDS**

	1 Current Year	2 Prior Year
1. Aggregate reserve for life contracts \$ 6,744,742 (Exh. 5, Line 9999999) less \$ included in Line 6.3 (including \$ Modco Reserve)	6,744,742	6,178,641
2. Aggregate reserve for accident and health contracts (Exhibit 6, Line 17, Col. 1) (including \$ Modco Reserve)		
3. Liability for deposit-type contracts (Exhibit 7, Line 14, Col. 1) (including \$ Modco Reserve)		
4. Contract claims:		
4.1 Life (Exhibit 8, Part 1, Line 4.4, Col. 1 less sum of Cols. 9, 10 and 11)	32,000	2,000
4.2 Accident and health (Exhibit 8, Part 1, Line 4.4, sum of Cols. 9, 10 and 11)		
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)		
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 \$ accident and health premiums (Exhibit 1, Part 1, Col. 1, sum of lines 4 and 14)	4,015	3,001
9. Contract liabilities not included elsewhere:		
9.1 Surrender values on canceled contracts		
9.2 Provision for experience rating refunds, including the liability of \$ 0 accident and health experience rating refunds of which \$ is for medical loss ratio rebate per the Public Health Service Act		
9.3 Other amounts payable on reinsurance including \$ assumed and \$ ceded		
9.4 Interest maintenance reserve (IMR, Line 6)	59,827	66,066
10. Commissions to agents due or accrued-life and annuity contracts \$ 131 accident and health \$ and deposit-type contract funds \$	131	214
11. Commissions and expense allowances payable on reinsurance assumed		
12. General expenses due or accrued (Exhibit 2, Line 12, Col. 6)	1,318	897
13. Transfers to Separate Accounts due or accrued (net) (including \$ accrued for expense allowances recognized in reserves, net of reinsured allowances)		
14. Taxes, licenses and fees due or accrued, excluding federal income taxes (Exhibit 3, Line 9, Col. 5)	14,083	15,567
15.1 Current federal and foreign income taxes including \$ on realized capital gains (losses)		48,511
15.2 Net deferred tax liability		
16. Unearned investment income	5,680	5,598
17. Amounts withheld or retained by company as agent or trustee	301	186
18. Amounts held for agents' account, including \$ agents' credit balances		
19. Remittances and items not allocated	176	(126)
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:		
24.01 Asset valuation reserve (AVR, Line 16, Col. 7)	34,826	48,197
24.02 Reinsurance in unauthorized companies		
24.03 Funds held under reinsurance treaties with unauthorized reinsurers		
24.04 Payable to parent, subsidiaries and affiliates	22,572	16,571
24.05 Drafts outstanding		
24.06 Liability for amounts held under uninsured plans		
24.07 Funds held under coinsurance		
24.08 Derivatives		
24.09 Payable for securities		
24.10 Payable for securities lending		
24.11 Capital notes \$ and interest thereon \$		
25. Aggregate write-ins for liabilities	215	18
26. Total Liabilities excluding Separate Accounts business (Lines 1 to 25)	6,919,886	6,385,341
27. From Separate Accounts Statement		
28. Total Liabilities (Lines 26 and 27)	6,919,886	6,385,341
29. Common capital stock	2,500,000	2,500,000
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)	4,500,000	4,500,000
34. Aggregate write-ins for special surplus funds	37,861	33,222
35. Unassigned funds (surplus)	2,412,370	3,717,916
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)	6,950,231	8,251,138
38. Totals of Lines 29, 30 and 37 (Page 4, Line 55)	9,450,231	10,751,138
39. Totals of Lines 28 and 38 (Page 2, Line 28, Col. 3)	16,370,117	17,136,479
<b>DETAILS OF WRITE-INS</b>		
2501. Accrued interest on policy claims	215	18
2502.		
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page		
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	215	18
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	37,861	33,222
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)	37,861	33,222

**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) .....	285,156	297,410
2. Considerations for supplementary contracts with life contingencies .....		
3. Net investment income (Exhibit of Net Investment Income, Line 17) .....	692,796	799,097
4. Amortization of interest maintenance reserve (IMR, Line 5) .....	6,893	7,053
5. Separate Accounts net gain from operations excluding unrealized gains or losses .....		
6. Commissions and expense allowances on reinsurance ceded (Exhibit 1, Part 2, Line 26.1, Col. 1) .....		
7. Reserve adjustments on reinsurance ceded .....		
8. Miscellaneous Income:		
8.1 Income from fees associated with investment management, administration and contract guarantees from Separate Accounts .....		
8.2 Charges and fees for deposit-type contracts .....		
8.3 Aggregate write-ins for miscellaneous income .....		
9. Total (Lines 1 to 8.3) .....	984,845	1,103,560
10. Death benefits .....	216,910	206,732
11. Matured endowments (excluding guaranteed annual pure endowments) .....		
12. Annuity benefits (Exhibit 8, Part 2, Line 6.4, Cols. 4 + 8) .....		
13. Disability benefits and benefits under accident and health contracts .....	5,380	6,644
14. Coupons, guaranteed annual pure endowments and similar benefits .....		
15. Surrender benefits and withdrawals for life contracts .....	129,282	84,736
16. Group conversions .....		
17. Interest and adjustments on contract or deposit-type contract funds .....	5,769	1,318
18. Payments on supplementary contracts with life contingencies .....		
19. Increase in aggregate reserves for life and accident and health contracts .....	566,101	(161,067)
20. Totals (Lines 10 to 19) .....	923,442	138,363
21. Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only) (Exhibit 1, Part 2, Line 31, Col. 1) .....	1,568	1,054
22. Commissions and expense allowances on reinsurance assumed (Exhibit 1, Part 2, Line 26.2, Col. 1) .....		
23. General insurance expenses (Exhibit 2, Line 10, Cols. 1, 2, 3 and 4) .....	201,768	147,990
24. Insurance taxes, licenses and fees, excluding federal income taxes (Exhibit 3, Line 7, Cols. 1 + 2 + 3) .....	71,986	67,174
25. Increase in loading on deferred and uncollected premiums .....	(237)	(344)
26. Net transfers to or (from) Separate Accounts net of reinsurance .....		
27. Aggregate write-ins for deductions .....		
28. Totals (Lines 20 to 27) .....	1,198,527	354,237
29. Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28) .....	(213,682)	749,323
30. Dividends to policyholders .....		
31. Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30) .....	(213,682)	749,323
32. Federal and foreign income taxes incurred (excluding tax on capital gains) .....	104,521	232,283
33. Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or (losses) (Line 31 minus Line 32) .....	(318,203)	517,040
34. Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of \$ 3,386 (excluding taxes of \$ 352 transferred to the IMR) .....	(3,386)	(7,004)
35. Net income (Line 33 plus Line 34) .....	(321,589)	510,036
<b>CAPITAL AND SURPLUS ACCOUNT</b>		
36. Capital and surplus, December 31, prior year (Page 3, Line 38, Col. 2) .....	10,751,138	10,243,586
37. Net income (Line 35) .....	(321,589)	510,036
38. Change in net unrealized capital gains (losses) less capital gains tax of \$ .....		
39. Change in net unrealized foreign exchange capital gain (loss) .....		
40. Change in net deferred income tax .....	185,071	(21,178)
41. Change in nonadmitted assets .....	(182,399)	18,304
42. Change in liability for reinsurance in unauthorized companies .....		
43. Change in reserve on account of change in valuation basis, (increase) or decrease (Exh. 5A, Line 9999999, Col. 4) .....		
44. Change in asset valuation reserve .....	13,371	2,294
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 .....		
47. Other changes in surplus in Separate Accounts Statement .....		
48. Change in surplus notes .....		
49. Cumulative effect of changes in accounting principles .....		
50. Capital changes:		
50.1 Paid in .....		
50.2 Transferred from surplus (Stock Dividend) .....		
50.3 Transferred to surplus .....		
51. Surplus adjustment:		
51.1 Paid in .....		
51.2 Transferred to capital (Stock Dividend) .....		
51.3 Transferred from capital .....		
51.4 Change in surplus as a result of reinsurance .....		
52. Dividends to stockholders .....	(1,000,000)	
53. Aggregate write-ins for gains and losses in surplus .....	4,639	(1,904)
54. Net change in capital and surplus for the year (Lines 37 through 53) .....	(1,300,907)	507,552
55. Capital and surplus, December 31, current year (Lines 36 + 54) (Page 3, Line 38) .....	9,450,231	10,751,138
<b>DETAILS OF WRITE-INS</b>		
08.301. ....		
08.302. ....		
08.303. ....		
08.398. Summary of remaining write-ins for Line 8.3 from overflow page .....		
08.399. Totals (Lines 08.301 thru 08.303 plus 08.398)(Line 8.3 above) .....		
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 .....	4,639	(1,904)
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) .....	4,639	(1,904)

**CASH FLOW**

	1	2
	Current Year	Prior Year
<b>Cash from Operations</b>		
1. Premiums collected net of reinsurance .....	287,920	302,088
2. Net investment income .....	770,906	856,706
3. Miscellaneous income .....		
4. Total (Lines 1 through 3) .....	1,058,826	1,158,794
5. Benefit and loss related payments .....	327,144	299,433
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts .....		
7. Commissions, expenses paid and aggregate write-ins for deductions .....	275,512	215,670
8. Dividends paid to policyholders .....		
9. Federal and foreign income taxes paid (recovered) net of \$ ..... 2,560 tax on capital gains (losses) .....	167,152	229,223
10. Total (Lines 5 through 9) .....	769,808	744,326
11. Net cash from operations (Line 4 minus Line 10) .....	289,018	414,468
<b>Cash from Investments</b>		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds .....	4,335,928	3,383,777
12.2 Stocks .....		500,000
12.3 Mortgage loans .....		
12.4 Real estate .....		
12.5 Other invested assets .....		
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments .....		
12.7 Miscellaneous proceeds .....		1,563
12.8 Total investment proceeds (Lines 12.1 to 12.7) .....	4,335,928	3,885,340
13. Cost of investments acquired (long-term only):		
13.1 Bonds .....	2,995,548	4,448,564
13.2 Stocks .....		
13.3 Mortgage loans .....		
13.4 Real estate .....		
13.5 Other invested assets .....		
13.6 Miscellaneous applications .....	522,547	
13.7 Total investments acquired (Lines 13.1 to 13.6) .....	3,518,095	4,448,564
14. Net increase (decrease) in contract loans and premium notes .....	(3,248)	(22,087)
15. Net cash from investments (Line 12.8 minus Line 13.7 minus Line 14) .....	821,081	(541,137)
<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 .....		
16.3 Borrowed funds .....		
16.4 Net deposits on deposit-type contracts and other insurance liabilities .....		
16.5 Dividends to stockholders .....	1,000,000	
16.6 Other cash provided (applied) .....	6,471	(3,139)
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6) .....	(993,529)	(3,139)
<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) .....	116,570	(129,808)
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year .....	255,698	385,506
19.2 End of year (Line 18 plus Line 19.1) .....	372,268	255,698

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

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ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company  
**ANALYSIS OF OPERATIONS BY LINES OF BUSINESS**

	1 Total	2 Industrial Life	Ordinary			6 Credit Life (Group and Individual)	Group		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	285,156		285,156									
2. Considerations for supplementary contracts with life contingencies												
3. Net investment income	692,796		692,796									
4. Amortization of Interest Maintenance Reserve (IMR)	6,893		6,893									
5. Separate Accounts net gain from operations excluding unrealized gains or losses												
6. Commissions and expense allowances on reinsurance ceded												
7. Reserve adjustments on reinsurance ceded												
8. Miscellaneous Income:												
8.1 Fees associated with income from investment management, administration and contract guarantees from Separate Accounts												
8.2 Charges and fees for deposit-type contracts												
8.3 Aggregate write-ins for miscellaneous income												
9. Totals (Lines 1 to 8.3)	984,845		984,845									
10. Death benefits	216,910		216,910									
11. Matured endowments (excluding guaranteed annual pure endowments)												
12. Annuity benefits												
13. Disability benefits and benefits under accident and health contracts	5,380		5,380									
14. Coupons, guaranteed annual pure endowments and similar benefits												
15. Surrender benefits and withdrawals for life contracts	129,282		129,282									
16. Group conversions												
17. Interest and adjustments on contract or deposit-type contract funds	5,769		5,769									
18. Payments on supplementary contracts with life contingencies												
19. Increase in aggregate reserves for life and accident and health contracts	566,101		566,101									
20. Totals (Lines 10 to 19)	923,442		923,442									
21. Commissions on premiums, annuity considerations and deposit-type contract funds (direct business only)	1,568		1,568									
22. Commissions and expense allowances on reinsurance assumed												
23. General insurance expenses	201,768		201,768									
24. Insurance taxes, licenses and fees, excluding federal income taxes	71,986		71,986									
25. Increase in loading on deferred and uncollected premiums	(237)		(237)									
26. Net transfers to or (from) Separate Accounts net of reinsurance												
27. Aggregate write-ins for deductions												
28. Totals (Lines 20 to 27)	1,198,527		1,198,527									
29. Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)	(213,682)		(213,682)									
30. Dividends to policyholders												
31. Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30)	(213,682)		(213,682)									
32. Federal income taxes incurred (excluding tax on capital gains)	104,521		104,521									
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)	(318,203)		(318,203)									
<b>DETAILS OF WRITE-INS</b>												
08.301.												
08.302.												
08.303.												
08.398. Summary of remaining write-ins for Line 8.3 from overflow page												
08.399. Totals (Lines 08.301 thru 08.303 plus 08.398) (Line 8.3 above)												
2701.												
2702.												
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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 2011 OF THE Symetra National 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 .....	6,178,641		6,178,641					
2. Tabular net premiums or considerations .....	234,101		234,101					
3. Present value of disability claims incurred .....					XXX			
4. Tabular interest .....	207,907		207,907					
5. Tabular less actual reserve released .....								
6. Increase in reserve on account of change in valuation basis .....								
7. Other increases (net) .....	500,000		500,000					
8. Totals (Lines 1 to 7) .....	7,120,649		7,120,649					
9. Tabular cost .....	198,732		198,732		XXX			
10. Reserves released by death .....	10,712		10,712	XXX	XXX			XXX
11. Reserves released by other terminations (net) .....	166,463		166,463					
12. Annuity, supplementary contract and disability payments involving life contingencies .....								
13. Net transfers to or (from) Separate Accounts .....								
14. Total Deductions (Lines 9 to 13) .....	375,907		375,907					
15. Reserve December 31, current year	6,744,742		6,744,742					

**EXHIBIT OF NET INVESTMENT INCOME**

	1 Collected During Year	2 Earned During Year
1. U.S. Government bonds .....	(a) 263,175	228,769
1.1 Bonds exempt from U.S. tax .....	(a) .....	.....
1.2 Other bonds (unaffiliated) .....	(a) 496,316	472,925
1.3 Bonds of affiliates .....	(a) .....	.....
2.1 Preferred stocks (unaffiliated) .....	(b) .....	.....
2.11 Preferred stocks of affiliates .....	(b) .....	.....
2.2 Common stocks (unaffiliated) .....	.....	.....
2.21 Common stocks of affiliates .....	.....	.....
3. Mortgage loans .....	(c) .....	.....
4. Real estate .....	(d) .....	.....
5. Contract loans .....	9,290	9,194
6. Cash, cash equivalents and short-term investments .....	(e) 789	813
7. Derivative instruments .....	(f) .....	.....
8. Other invested assets .....	.....	.....
9. Aggregate write-ins for investment income .....	.....	.....
10. Total gross investment income .....	769,570	711,701
11. Investment expenses .....	.....	(g) 18,905
12. Investment taxes, licenses and fees, excluding federal income taxes .....	.....	(g) .....
13. Interest expense .....	.....	(h) .....
14. Depreciation on real estate and other invested assets .....	.....	(i) .....
15. Aggregate write-ins for deductions from investment income .....	.....	.....
16. Total deductions (Lines 11 through 15) .....	.....	18,905
17. Net investment income (Line 10 minus Line 16) .....	.....	692,796
<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) .....	.....	.....
1501. ....	.....	.....
1502. ....	.....	.....
1503. ....	.....	.....
1598. Summary of remaining write-ins for Line 15 from overflow page .....	.....	.....
1599. Totals (Lines 1501 thru 1503 plus 1598) (Line 15, above) .....	.....	.....

- (a) Includes \$ 23,127 accrual of discount less \$ 43,382 amortization of premium and less \$ 7,037 paid for accrued interest on purchases.
- (b) Includes \$ ..... accrual of discount less \$ ..... amortization of premium and less \$ ..... paid for accrued dividends on purchases.
- (c) Includes \$ ..... accrual of discount less \$ ..... amortization of premium and less \$ ..... paid for accrued interest on purchases.
- (d) Includes \$ ..... for company's occupancy of its own buildings; and excludes \$ ..... interest on encumbrances.
- (e) Includes \$ ..... accrual of discount less \$ ..... amortization of premium and less \$ ..... paid for accrued interest on purchases.
- (f) Includes \$ ..... accrual of discount less \$ ..... amortization of premium.
- (g) Includes \$ ..... investment expenses and \$ ..... investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$ ..... interest on surplus notes and \$ ..... interest on capital notes.
- (i) Includes \$ ..... depreciation on real estate and \$ ..... depreciation on other invested assets.

**EXHIBIT OF CAPITAL GAINS (LOSSES)**

	1	2	3	4	5
	Realized Gain (Loss) On Sales or Maturity	Other Realized Adjustments	Total Realized Capital Gain (Loss) (Columns 1 + 2)	Change in Unrealized Capital Gain (Loss)	Change in Unrealized Foreign Exchange Capital Gain (Loss)
1. U.S. Government bonds .....	.....	.....	.....	.....	.....
1.1 Bonds exempt from U.S. tax .....	.....	.....	.....	.....	.....
1.2 Other bonds (unaffiliated) .....	1,006	.....	1,006	.....	.....
1.3 Bonds of affiliates .....	.....	.....	.....	.....	.....
2.1 Preferred stocks (unaffiliated) .....	.....	.....	.....	.....	.....
2.11 Preferred stocks of affiliates .....	.....	.....	.....	.....	.....
2.2 Common stocks (unaffiliated) .....	.....	.....	.....	.....	.....
2.21 Common stocks of affiliates .....	.....	.....	.....	.....	.....
3. Mortgage loans .....	.....	.....	.....	.....	.....
4. Real estate .....	.....	.....	.....	.....	.....
5. Contract loans .....	.....	.....	.....	.....	.....
6. Cash, cash equivalents and short-term investments .....	.....	.....	.....	.....	.....
7. Derivative instruments .....	.....	.....	.....	.....	.....
8. Other invested assets .....	.....	.....	.....	.....	.....
9. Aggregate write-ins for capital gains (losses) .....	.....	.....	.....	.....	.....
10. Total capital gains (losses) .....	1,006	.....	1,006	.....	.....
<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) .....	.....	.....	.....	.....	.....



ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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											
2. Deferred and accrued											
3. Deferred, accrued and uncollected:											
3.1 Direct											
3.2 Reinsurance assumed											
3.3 Reinsurance ceded											
3.4 Net (Line 1 + Line 2)											
4. Advance											
5. Line 3.4 - Line 4											
6. Collected during year:											
6.1 Direct											
6.2 Reinsurance assumed											
6.3 Reinsurance ceded											
6.4 Net											
7. Line 5 + Line 6.4											
8. Prior year (uncollected + deferred and accrued - advance)											
9. First year premiums and considerations:											
9.1 Direct											
9.2 Reinsurance assumed											
9.3 Reinsurance ceded											
9.4 Net (Line 7 - Line 8)											
<b>SINGLE</b>											
10. Single premiums and considerations:											
10.1 Direct											
10.2 Reinsurance assumed											
10.3 Reinsurance ceded											
10.4 Net											
<b>RENEWAL</b>											
11. Uncollected	3,585		3,585								
12. Deferred and accrued	59,269		59,269								
13. Deferred, accrued and uncollected:											
13.1 Direct	62,854		62,854								
13.2 Reinsurance assumed											
13.3 Reinsurance ceded											
13.4 Net (Line 11 + Line 12)	62,854		62,854								
14. Advance	4,015		4,015								
15. Line 13.4 - Line 14	58,839		58,839								
16. Collected during year:											
16.1 Direct	287,919		287,919								
16.2 Reinsurance assumed											
16.3 Reinsurance ceded											
16.4 Net	287,919		287,919								
17. Line 15 + Line 16.4	346,758		346,758								
18. Prior year (uncollected + deferred and accrued - advance)	61,602		61,602								
19. Renewal premiums and considerations:											
19.1 Direct	285,156		285,156								
19.2 Reinsurance assumed											
19.3 Reinsurance ceded											
19.4 Net (Line 17 - Line 18)	285,156		285,156								
<b>TOTAL</b>											
20. Total premiums and annuity considerations:											
20.1 Direct	285,156		285,156								
20.2 Reinsurance assumed											
20.3 Reinsurance ceded											
20.4 Net (Lines 9.4 + 10.4 + 19.4)	285,156		285,156								

**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 .....											
22. All other .....											
<b>REINSURANCE COMMISSIONS AND EXPENSE ALLOWANCES INCURRED</b>											
23. First year (other than single):											
23.1 Reinsurance ceded .....											
23.2 Reinsurance assumed .....											
23.3 Net ceded less assumed .....											
24. Single:											
24.1 Reinsurance ceded .....											
24.2 Reinsurance assumed .....											
24.3 Net ceded less assumed .....											
25. Renewal:											
25.1 Reinsurance ceded .....											
25.2 Reinsurance assumed .....											
25.3 Net ceded less assumed .....											
26. Totals:											
26.1 Reinsurance ceded (Page 6, Line 6) .....											
26.2 Reinsurance assumed (Page 6, Line 22) .....											
26.3 Net ceded less assumed .....											
<b>COMMISSIONS INCURRED (direct business only)</b>											
27. First year (other than single) .....											
28. Single .....											
29. Renewal .....	1,568		1,568								
30. Deposit-type contract funds .....											
31. Totals (to agree with Page 6, Line 21)	1,568		1,568								

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company  
**EXHIBIT 2 - GENERAL EXPENSES**

	Insurance				5 Investment	6 Total
	1 Life	2 Accident and Health		4 All Other Lines of Business		
		Cost Containment	3 All Other			
1. Rent	8,044					8,044
2. Salaries and wages	97,991					97,991
3.11 Contributions for benefit plans for employees	12,369					12,369
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	659					659
3.32 Other agent welfare						
4.1 Legal fees and expenses	2,650					2,650
4.2 Medical examination fees						
4.3 Inspection report fees						
4.4 Fees of public accountants and consulting actuaries	23,452					23,452
4.5 Expense of investigation and settlement of policy claims						
5.1 Traveling expenses	3,696					3,696
5.2 Advertising						
5.3 Postage, express, telegraph and telephone	1,897					1,897
5.4 Printing and stationery	2,321					2,321
5.5 Cost or depreciation of furniture and equipment	1,734					1,734
5.6 Rental of equipment						
5.7 Cost or depreciation of EDP equipment and software	4,490					4,490
6.1 Books and periodicals	2,656					2,656
6.2 Bureau and association fees	5,204					5,204
6.3 Insurance, except on real estate						
6.4 Miscellaneous losses						
6.5 Collection and bank service charges	24,296					24,296
6.6 Sundry general expenses						
6.7 Group service and administration fees						
6.8 Reimbursements by uninsured plans						
7.1 Agency expense allowance						
7.2 Agents' balances charged off (less \$ recovered)						
7.3 Agency conferences other than local meetings						
9.1 Real estate expenses						
9.2 Investment expenses not included elsewhere				18,905		18,905
9.3 Aggregate write-ins for expenses	10,309					10,309
10. General expenses incurred	201,768			18,905 (a)		220,673
11. General expenses unpaid December 31, prior year				897		897
12. General expenses unpaid December 31, current year				1,318		1,318
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)	201,768			18,484		220,252
<b>DETAILS OF WRITE-INS</b>						
09.301. Consulting Fees	6,255					6,255
09.302. Miscellaneous	4,054					4,054
09.303. ....						
09.398. Summary of remaining write-ins for Line 9.3 from overflow page						
09.399. Totals (Lines 09.301 thru 09.303 plus 09.398) (Line 9.3 above)	10,309					10,309

(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					
2. State insurance department licenses and fees	43,777				43,777
3. State taxes on premiums	8,881				8,881
4. Other state taxes, including \$ for employee benefits	4,510				4,510
5. U.S. Social Security taxes	6,498				6,498
6. All other taxes	8,320				8,320
7. Taxes, licenses and fees incurred	71,986				71,986
8. Taxes, licenses and fees unpaid December 31, prior year	15,567				15,567
9. Taxes, licenses and fees unpaid December 31, current year	14,083				14,083
10. Taxes, licenses and fees paid during year (Lines 7 + 8 - 9)	73,470				73,470

**EXHIBIT 4 - DIVIDENDS OR REFUNDS**

	1 Life	2 Accident and Health
	1. Applied to pay renewal premiums	
2. Applied to shorten the endowment or premium-paying period		
3. Applied to provide paid-up additions		
4. Applied to provide paid-up annuities		
5. Total Lines 1 through 4		
6. Paid in cash		
7. Left on deposit		
8. Aggregate write-ins for dividend or refund options		
9. Total Lines 5 through 8		
10. Amount due and unpaid		
11. Provision for dividends or refunds payable in the following calendar year		
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		
16. Total from prior year		
17. Total dividends or refunds (Lines 9 + 15 - 16)		
<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)		

**NONE**



**EXHIBIT 5 - INTERROGATORIES**

- 1.1 Has the reporting entity ever issued both participating and non-participating contracts?..... Yes [ ] No [ X ]
- 1.2 If not, state which kind is issued.  
NON-PARTICIPATING .....
- 2.1 Does the reporting entity at present issue both participating and non-participating contracts?..... 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.  
N/A .....
6. Does the reporting entity hold reserves for any annuity contracts that are less than the reserves that would be held on a standard basis? ..... Yes [ ] No [ X ]
- 6.1 If so, state the amount of reserve on such contracts on the basis actually held: ..... \$
- 6.2 That would have been held (on an exact or approximate basis) using the actual ages of the annuitants; the interest rate(s) used in 6.1; and the same mortality basis used by the reporting entity for the valuation of comparable annuity benefits issued to standard lives. If the reporting entity has no comparable annuity benefits for standard lives to be valued, the mortality basis shall be the table most recently approved by the state of domicile for valuing individual annuity benefits: ..... \$
- Attach statement of methods employed in their valuation.
7. Does the reporting entity have any Synthetic GIC contracts or agreements in effect as of December 31 of the current year? ..... 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 Reserves for Accident and Health Contracts

**N O N E**

Exhibit 7 - Deposit-Type Contracts

**N O N E**

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 .....											
2.11 Direct .....											
2.12 Reinsurance assumed .....											
2.13 Reinsurance ceded .....											
2.14 Net .....			(b)	(b)		(b)	(b)				
2.2 Other .....	30,000		30,000								
2.21 Direct .....											
2.22 Reinsurance assumed .....											
2.23 Reinsurance ceded .....											
2.24 Net .....	30,000		(b) 30,000	(b)		(b)	(b)		(b)	(b)	(b)
3. Incurred but unreported:											
3.1 Direct .....	2,000		2,000								
3.2 Reinsurance assumed .....											
3.3 Reinsurance ceded .....											
3.4 Net .....	2,000		(b) 2,000	(b)		(b)	(b)		(b)	(b)	(b)
4. TOTALS .....											
4.1 Direct .....	32,000		32,000								
4.2 Reinsurance assumed .....											
4.3 Reinsurance ceded .....											
4.4 Net .....	32,000	(a)	(a) 32,000				(a)				

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

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 .....	192,290		192,290								
1.2 Reinsurance assumed .....											
1.3 Reinsurance ceded .....											
1.4 Net (d) .....	192,290		192,290								
2. Liability December 31, current year from Part 1:											
2.1 Direct .....	32,000		32,000								
2.2 Reinsurance assumed .....											
2.3 Reinsurance ceded .....											
2.4 Net .....	32,000		32,000								
3. Amounts recoverable from reinsurers December 31, current year .....											
4. Liability December 31, prior year:											
4.1 Direct .....	2,000		2,000								
4.2 Reinsurance assumed .....											
4.3 Reinsurance ceded .....											
4.4 Net .....	2,000		2,000								
5. Amounts recoverable from reinsurers December 31, prior year .....											
6. Incurred Benefits											
6.1 Direct .....	222,290		222,290								
6.2 Reinsurance assumed .....											
6.3 Reinsurance ceded .....											
6.4 Net .....	222,290		222,290								

- (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 \$ ..... in Line 1.1, \$ ..... in Line 1.4.  
 \$ ..... in Line 6.1, and \$ ..... 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 \$ .....5,380 premiums waived under total and permanent disability benefits.



**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. Derivatives (Schedule DB) .....			
8. Other invested assets (Schedule BA) .....			
9. Receivables for securities .....			
10. Securities lending reinvested collateral assets (Schedule DL) .....			
11. Aggregate write-ins for invested assets .....			
12. Subtotals, cash and invested assets (Lines 1 to 11) .....			
13. Title plants (for Title insurers only) .....			
14. Investment income due and accrued .....			
15. Premiums and considerations:			
15.1 Uncollected premiums and agents' balances in the course of collection .....			
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due .....			
15.3 Accrued retrospective premiums .....			
16. Reinsurance:			
16.1 Amounts recoverable from reinsurers .....			
16.2 Funds held by or deposited with reinsured companies .....			
16.3 Other amounts receivable under reinsurance contracts .....			
17. Amounts receivable relating to uninsured plans .....			
18.1 Current federal and foreign income tax recoverable and interest thereon .....			
18.2 Net deferred tax asset .....	811,766	633,956	(177,810)
19. Guaranty funds receivable or on deposit .....			
20. Electronic data processing equipment and software .....			
21. Furniture and equipment, including health care delivery assets .....			
22. Net adjustment in assets and liabilities due to foreign exchange rates .....			
23. Receivables from parent, subsidiaries and affiliates .....			
24. Health care and other amounts receivable .....			
25. Aggregate write-ins for other than invested assets .....		50	50
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25) .....	811,766	634,006	(177,760)
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts .....			
28. Total (Lines 26 and 27) .....	811,766	634,006	(177,760)
<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) .....			
2501. Other Assets .....		50	50
2502. ....			
2503. ....			
2598. Summary of remaining write-ins for Line 25 from overflow page .....			
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above) .....		50	50

## NOTES TO FINANCIAL STATEMENTS

### 1. Summary of Significant Accounting Policies

#### A. Accounting Practices

The accompanying financial statements of Symetra National Life Insurance Company of (the Company) have been prepared in conformity with the National Association of Insurance Commissioners (NAIC) Accounting Practices and Procedures Manual and Annual Statement Instructions, except to the extent that practices prescribed or permitted by the Office of the Insurance Commissioner of the State of Washington (the Department) differ. No differences exist in the prescribed or permitted practices that result in a material effect on surplus as of December 31, 2011 or 2010.

Under Washington State Insurance code RCW 48.13.240(3), a mutual fund is classified as a miscellaneous investment and investment in a single entity's mutual fund is limited to no more than 1% of an insurer's admitted assets. The Company, with the explicit permission of the Department, is permitted to invest up to 4% of its assets in a single entity's mutual funds, as well as an unlimited amount of its assets in mutual funds listed on the NAIC's most recent Mutual Funds List as U.S. Direct Obligations/Full Faith and Credit Exempt. As of December 31, 2011 and 2010, the Company held \$16,532 or 0.1% and \$226,797 or 1.3%, respectively, of admitted assets in a single entity's mutual fund. The Company has no other permitted practices.

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

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

#### C. Accounting Policy

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

In addition, the Company uses the following accounting policies:

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

## NOTES TO FINANCIAL STATEMENTS

### 2. Accounting Changes and Correction of Errors

The Company adopted SSAP No. 35R, *Guaranty Funds and Other Assessments* as of January 1, 2011. This SSAP expands guidance on recognition of assets from premium tax offsets to match recognition guidance of related accrued liabilities for assessments. Additionally, estimated premium tax recoverable assets are limited to in-force policies and do not include expected renewals on short-term contracts. The adoption did not have a material impact on the Company's assets, liabilities, income or surplus.

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

There were no errors discovered for the years ended December 31, 2011 or 2010.

### 3. Business Combinations and Goodwill

Not applicable

### 4. Discontinued Operations

Not applicable

### 5. Investments

#### A. Mortgage Loans

The Company has no investments in mortgage loans.

#### B. Debt Restructuring

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

#### C. Reverse Mortgages

The Company has no investments in reverse mortgages.

#### D. Loan-Backed Securities

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

1. Less than 12 months	\$ (2,506)
------------------------	------------
  - b. The aggregate related fair value of securities with unrealized losses:
 

1. Less than 12 months	\$ 102,998
------------------------	------------
- (5) The Company's review of loan-backed securities for OTTI includes both quantitative and qualitative criteria. Quantitative criteria include the length of time and amount that each security is in an unrealized loss position (i.e., is underwater) and whether expected future cash flows indicate a credit loss exists.

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

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

## NOTES TO FINANCIAL STATEMENTS

### E. Repurchase Agreements and/or Securities Lending Transactions.

The Company has no investments in repurchase agreements or securities lending transactions.

### F. Real Estate

The Company has no investments in real estate.

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

The Company has no investments in LIHTC.

## 6. Joint Ventures, Partnerships and Limited Liability Companies

The Company has no investments in joint ventures, partnerships or limited liability companies.

## 7. Investment Income

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

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

### B. There was no investment income due and accrued excluded from surplus as of December 31, 2011 or 2010.

## 8. Derivative Instruments

The Company has no investments in derivative instruments.

## 9. Income Taxes

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

#### 1. Total DTAs and DTLs by tax character

12/31/2011		
(1)	(2)	(3)
<u>Ordinary</u>	<u>Capital</u>	<u>(Col 1+2)</u> <u>Total</u>
\$ 921,630	\$ -	\$ 921,630
-	-	-
921,630	-	921,630
(39,989)	-	(39,989)
881,641	-	881,641
(811,766)	-	(811,766)
<u>\$ 69,875</u>	<u>\$ -</u>	<u>\$ 69,875</u>

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

12/31/2010		
(4)	(5)	(6)
<u>Ordinary</u>	<u>Capital</u>	<u>(Col 4+5)</u> <u>Total</u>
\$ 755,236	\$ -	\$ 755,236
-	-	-
755,236	-	755,236
(58,666)	-	(58,666)
696,570	-	696,570
(633,956)	-	(633,956)
<u>\$ 62,614</u>	<u>\$ -</u>	<u>\$ 62,614</u>

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

## NOTES TO FINANCIAL STATEMENTS

	Change		
(7) (Col 1-4) Ordinary	(8) (Col 2-5) Capital	(9) (Col 7+8) Total	
(a) Gross DTAs	\$ 166,394	\$ -	\$ 166,394
(b) Statutory valuation allowance adjustment	-	-	-
(c) Adjusted gross DTAs (1a+1b)	166,394	-	166,394
(d) DTLs	18,677	-	18,677
(e) Subtotal (net DTAs)	185,071	-	185,071
(f) DTAs nonadmitted	(177,810)	-	(177,810)
(g) Net admitted DTA (1e+1f)	\$ 7,261	\$ -	\$ 7,261

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

### 2. SSAP No. 10R Election

The Company first elected to admit DTAs pursuant to paragraph 10.e. of SSAP No. 10R upon adoption of SSAP No. 10R as of December 31, 2009. The Company did not change this election for the years ended December 31, 2011 and 2010.

### 3. Increased admitted amount under paragraph 10.e.

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

12/31/2011	12/31/2010	Change
\$ 37,861	\$ 33,222	\$ 4,639
-	-	-
\$ 37,861	\$ 33,222	\$ 4,639

### 4. Summary of admitted adjusted gross DTAs

#### Admission calculation components - SSAP No. 10R, par. 10.a., 10.b., and 10.c.

(a) Amount admitted under paragraph 10.a.  
(b) Amount admitted under paragraph 10.b.i.  
(c) Amount admitted under paragraph 10.c.  
(d) Total admitted under paragraph 10.a. through 10.c.

12/31/2011		
(1) Ordinary	(2) Capital	(3) (Col 1+2) Total
\$ 32,015	\$ -	\$ 32,015
-	-	-
39,989	-	39,989
\$ 72,004	\$ -	\$ 72,004

#### Admission calculation components - SSAP No. 10R, par. 10.e.

(e) Amount admitted under paragraph 10.e.i.  
(f) Amount admitted under paragraph 10.e.ii.a.  
(g) Amount admitted under paragraph 10.e.iii.  
(h) Total admitted under paragraph 10.e.

\$ 69,876	\$ -	\$ 69,876
-	-	-
39,989	-	39,989
\$ 109,865	\$ -	\$ 109,865

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

\$ 37,861	\$ -	\$ 37,861
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## NOTES TO FINANCIAL STATEMENTS

				<u>12/31/2010</u>		
				(4)	(5)	(6)
				Ordinary	Capital	(Col 4+5) Total
<u>Admission calculation components - SSAP No. 10R, par. 10.a., 10.b., and 10.c.</u>						
(a) Amount admitted under paragraph 10.a.	\$	29,392	\$	-	\$	29,392
(b) Amount admitted under paragraph 10.b.i.		-		-		-
(c) Amount admitted under paragraph 10.c.		58,666		-		58,666
(d) Total admitted under paragraph 10.a. through 10.c.	\$	88,058	\$	-	\$	88,058
<u>Admission calculation components - SSAP No. 10R, par. 10.e.</u>						
(e) Amount admitted under paragraph 10.e.i.	\$	62,614	\$	-	\$	62,614
(f) Amount admitted under paragraph 10.e.ii.a.		-		-		-
(g) Amount admitted under paragraph 10.e.iii.		58,666		-		58,666
(h) Total admitted under paragraph 10.e.	\$	121,280	\$	-	\$	121,280
(i) Additional amount admitted under paragraph 10.e.	\$	33,222	\$	-	\$	33,222
				<u>Change</u>		
				(7)	(8)	(9)
				(Col 1-4)	(Col 2-5)	(Col 7+8)
				Ordinary	Capital	Total
<u>Admission calculation components - SSAP No. 10R, par. 10.a., 10.b., and 10.c.</u>						
(a) Amount admitted under paragraph 10.a.	\$	2,623	\$	-	\$	2,623
(b) Amount admitted under paragraph 10.b.i.		-		-		-
(c) Amount admitted under paragraph 10.c.		(18,677)		-		(18,677)
(d) Total admitted under paragraph 10.a. through 10.c.	\$	(16,054)	\$	-	\$	(16,054)
<u>Admission calculation components - SSAP No. 10R, Par. 10.e.</u>						
(e) Amount admitted under paragraph 10.e.i.	\$	7,262	\$	-	\$	7,262
(f) Amount admitted under paragraph 10.e.ii.a.		-		-		-
(g) Amount admitted under paragraph 10.e.iii.		(18,677)		-		(18,677)
(h) Total admitted under paragraph 10.e.	\$	(11,415)	\$	-	\$	(11,415)
(i) Additional amount admitted under paragraph 10.e.	\$	4,639	\$	-	\$	4,639
Ten percent of statutory surplus under paragraph 10.b.ii.	\$	990,193				
Fifteen percent of statutory surplus under par. 10.e.ii.b.		1,485,289				
Risk based capital amount utilized in paragraph 10.d.						
Total adjusted capital	\$	9,447,195				
Authorized control level		79,392				

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

				<u>12/31/2011</u>		
				(1)	(2)	(3)
				-	-	(Col 2-1)
				SSAP 10R	SSAP 10R	Increased
				Par. 10.a.-10.c.	Par. 10.e.	Amount
Admitted DTAs	\$	72,004	\$	109,865	\$	37,861
Admitted assets		16,329,813		16,367,674		37,861
Statutory surplus		9,412,369		9,450,230		37,861
Total adjusted capital		9,447,195		9,485,056		37,861

## NOTES TO FINANCIAL STATEMENTS

	<u>12/31/2010</u>		
	(4)	(5)	(6)
	-	-	(Col 5-4)
	SSAP 10R	SSAP 10R	Increased
	Par. 10.a.-10.c.	Par. 10.e.	Amount
Admitted DTAs	\$ 88,058	\$ 121,280	\$ 33,222
Admitted assets	17,085,504	17,118,726	33,222
Statutory surplus	10,717,916	10,751,138	33,222
Total adjusted capital	10,766,114	10,799,336	33,222

	Change		
	(7)	(8)	(9)
	(Col 1-4)	(Col 2-5)	(Col 8-7)
	SSAP No. 10R	SSAP No. 10R	Increased
	Par. 10.a.-10.c.	Par. 10.e.	Amount
Admitted DTAs	\$ (16,054)	\$ (11,415)	\$ 4,639
Admitted assets	(755,691)	(751,052)	4,639
Statutory surplus	(1,305,547)	(1,300,908)	4,639
Total adjusted capital	(1,318,919)	(1,314,280)	4,639

B. DTLs are not recognized for the following amounts:

The Company has no DTLs which have not been recognized.

C. Components of income taxes incurred:

	(1)	(2)	(3)
	<u>12/31/2011</u>	<u>12/31/2010</u>	(Col 1-2)
			<u>Change</u>
Current income taxes:			
Current year tax provision before tax credits	\$ 99,799	\$ 227,561	\$ (127,762)
Prior year under accrual	4,722	4,722	-
Income tax expense from operations	104,521	232,283	(127,762)
Taxes on capital gains(losses)	3,738	10,440	(6,702)
Current income taxes incurred	<u>\$ 108,259</u>	<u>\$ 242,723</u>	<u>\$ (134,464)</u>

The main components of deferred tax amounts are as follows:

Assets:

	(1)	(2)	(3)
	<u>12/31/2011</u>	<u>12/31/2010</u>	(Col 1-2)
			<u>Change</u>
Investments	\$ 1,988	\$ 1,960	\$ 28
Non-admitted assets	-	18	(18)
Proxy deferred acquisition costs	39,218	39,826	(608)
Reserves	879,868	712,891	166,977
All others	556	541	15
Total DTAs	<u>\$ 921,630</u>	<u>\$ 755,236</u>	<u>\$ 166,394</u>
Total DTAs – nonadmitted	811,766	633,956	177,810

Liabilities:

Investments	17,990	36,055	(18,065)
Deferred premium/loading	21,999	22,611	(612)
Total DTLs	<u>\$ 39,989</u>	<u>\$ 58,666</u>	<u>\$ (18,677)</u>

Change in net deferred income tax \$ 185,071

Surplus Adjustments:

Tax effect of change in nonadmitted assets	18
Adjustments to prior year net DTAs	(4,722)
Adjusted change in net deferred income tax	<u>\$ 180,367</u>

No adjustments were made to the Company's gross DTAs because of a change in circumstances. The Company expects it will fully realize the DTAs and no statutory valuation allowance has been recorded as of December 31, 2011 or 2010.

## NOTES TO FINANCIAL STATEMENTS

## D. Significant statutory to tax adjustments on current taxes:

	<u>12/31/2011</u>	<u>12/31/2010</u>
Ordinary income tax at federal statutory rate (35%)	\$ (74,789)	\$ 262,263
Capital income tax at federal statutory rate (35%)	352	3,436
Total income tax	(74,437)	265,699
Permanent items and other adjustments	20	689
Change in interest maintenance reserve	(2,413)	(2,469)
Prior year adjustment	4,722	4,722
Federal income tax expense	<u>\$ (72,108)</u>	<u>\$ 268,641</u>
Federal & foreign taxes incurred	\$ 108,259	\$ 242,723
Change in net deferred income taxes	(180,367)	25,918
Total statutory income tax expense	<u>\$ (72,108)</u>	<u>\$ 268,641</u>

## E. (1) The Company had no net operating or capital loss carryforward amounts as of December 2011 or 2010.

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

	<u>2011</u>	<u>2010</u>	<u>2009</u>
Ordinary income	\$ 99,799	\$ 242,723	\$ 179,848
Capital gain	3,738	-	-

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

## (2) The method of allocation between companies is subject to written agreement, approved by the Board of Directors. Allocation is based on separate return calculations, except that current credit for tax credits and net operating loss carryforwards are determined on the basis of the consolidated group. Intercompany tax balances are settled quarterly.

## (3) The Company's federal income tax returns have been examined and closing agreements have been executed with the Internal Revenue Service, or the statute of limitations has expired for all tax periods through December 31, 2007.

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

A. B. and C. The following transactions were entered into by the Company with affiliates. Non-insurance transactions involving less than 0.5% of the Company's admitted assets are omitted, with the exception of cost allocation transactions which are discussed separately.

For the year ended December 31, 2011:

Date	Transaction Explanation	Insurer Name	Affiliate Name	Statement Value	Asset Received	Asset Transferred
June 23, 2011	Ordinary Dividend	Symetra National Life Insurance Co.	Symetra Life Insurance Co.	\$1,000,000		Cash

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

There were no material related party transactions for the years ended December 31, 2011 or 2010.

## D. As of December 31, 2011 and 2010, the Company reported the following amounts due (to)/from an affiliated company, which are generally settled within 30 days:

	December 31	
	2011	2010
Symetra Life Insurance Company	\$ (20,566)	\$ (14,376)
White Mountains Advisors, LLC	(2,006)	(2,195)
Total	<u>\$ (22,572)</u>	<u>\$ (16,571)</u>



## NOTES TO FINANCIAL STATEMENTS

- E. The Company has not agreed to any guarantees for affiliates.
- F. The Company has a Services and Shared Expenses Agreement with its affiliates under common ownership with Symetra Financial Corporation, whereby the parties each agree to provide and receive from each other certain general services (related to sharing common management, personnel and facilities) and to share expenses thereof. These expenses include charges for rent, corporate overhead, data processing systems, payroll, benefits, and other miscellaneous charges and are included in investment and general insurance expenses in the summary of operations.

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

- G. All outstanding shares of the Company are owned by Symetra Life Insurance Company. All outstanding shares of Symetra Life Insurance Company are owned by Symetra Financial Corporation, an insurance holding company domiciled in the state of Delaware. This control does not significantly change the operating results or financial position of the Company compared to results that would have been obtained without the control.
- H. The Company owns no shares, either directly or indirectly, in the Parent or Symetra Financial Corporation.
- I. Investments in subsidiary, controlled or affiliated companies (SCA's) - Not applicable
- J. Impairment write-down for investments in impaired SCA entities - Not applicable
- K. Investments in foreign insurance subsidiaries - Not applicable
- 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. The Company does not administer the defined contribution plan. See Note 12D.
- C. The Company does not participate in a multi-employer plan.

#### D. Consolidated Holding Company Plans

##### Retirement Plans

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

The plan includes a matching contribution of 100% of a participant's contributions, up to 6% of eligible compensation. The Company's share of expenses for the plan was not material for the years ended December 31, 2011 and 2010.

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

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

- (1) The Company's capital is common stock, 20,000 shares authorized, issued and outstanding, \$125 per share par value. There are no other classes of capital stock.
- (2) The Company has no preferred stock.
- (3) The Company is restricted as to the amount of dividends that can be paid to its shareholder without prior approval of the Department. This restriction is the greater of statutory net gain from operations for the previous year or 10% of total capital and surplus at the close of the previous year, subject to a maximum limit equal to statutory unassigned funds. Based on this restriction, the maximum dividend payout that may be made without prior approval in 2012 is \$945,023.
- (4) The Company paid dividends of \$1,000,000 and \$0 for the years ended December 31, 2011 and 2010, respectively. A dividend schedule is provided in Note 10.
- (5) Within the limitations of (3) above, there are no restrictions placed on the portion of Company profits that may be paid as ordinary dividends to shareholders.

## NOTES TO FINANCIAL STATEMENTS

- (6) The unassigned surplus funds are held for the benefit of the Company's shareholder, as the Company does not issue participating business.
- (7) There have been no advances to surplus.
- (8) The Company holds no stock for special purposes.
- (9) The increase in aggregate write-ins for special surplus funds of \$4,639 is due to an increase in the amount of the net deferred tax asset admitted under SSAP No. 10R paragraph 10.e. for the year ended December 31, 2011. See Note 9 – Income Taxes, for more information.
- (10) There was no increase (decrease) of unassigned funds (surplus) due to cumulative unrealized gains or losses as of December 31, 2011 or 2010.
- (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. (1) The Company has made no commitments or contingent commitments to an SCA entity.
  - (2) The Company has made no guarantees as of December 31, 2011 and 2010.
  - (3) Not applicable
- B. (1) The Company has liabilities established under SSAP No. 35R, *Guaranty Fund and Other Assessments* relating to estimated retrospective premium based guaranty fund assessments in the amounts of \$9,120 and \$9,783 as of December 31, 2011 and 2010, respectively. Changes in the liability for guaranty fund assessments are charged to operations in the period in which the Company is notified.
  - (2) Under SSAP No. 35R, the Company has related premium tax offsets of \$7,530 and \$8,233 as of December 31, 2011 and 2010, respectively.
- C. The Company has no material gain contingencies to report.
- D. Claims related extra contractual obligation and bad faith losses stemming from lawsuits - Not applicable
- E. Because of the nature of the business, the Company is subject to legal actions filed or threatened in the ordinary course of its business operations. The Company does not expect that any such litigation, pending or threatened as of December 31, 2011, will have a material adverse effect on its financial condition, future operating results, or liquidity.

### 15. Leases

Not applicable

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

Not applicable

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

- A. Transfers of Receivables Reported as Sales
  - The Company has no transfers of receivables recorded as sales.
- B. Transfer and Servicing of Financial Assets – Not applicable
- C. Wash Sales

The Company had no transactions which met the definition of wash sales as stated in SSAP No. 91, *Accounting for Transfers and Servicing of Financial Assets and Extinguishments of Liabilities*, for securities with a NAIC designation of 3 or below or unrated securities for the year ended December 31, 2011.

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

Not applicable

## NOTES TO FINANCIAL STATEMENTS

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

Not applicable

### 20. Fair Value Measurements

The Company had no assets measured and reported at fair value for the years ended December 31, 2011 and 2010.

### 21. Other Disclosures

A. Extraordinary Items – Not applicable

B. Troubled Debt Restructuring: Debtors – Not applicable

C. Other Disclosures

The book/adjusted carrying values of certain bonds on deposit with state regulatory authorities was \$2,372,857 and \$2,370,743 as of December 31, 2011 and 2010, respectively.

D. The Company does not carry any significant uncollected premium balances that are considered uncollectible.

E. Business Interruption Insurance Recoveries - Not applicable

F. State Transferable Tax Credits - Not applicable

G. Subprime-Mortgage- Related Risk Exposure

(1) In order to determine our subprime exposure, we included all securities issued from a dedicated subprime shelf. We have no securities with a subprime exposure.

(2) Direct exposure through investments in subprime mortgage loans – None

(3) Direct exposure through other investments – None

(4) Underwriting exposure to subprime mortgage risk through mortgage guaranty or financial guaranty insurance coverage - Not applicable

H. Retained Assets – Not applicable

### 22. Events Subsequent

Type I: Recognized Subsequent Events:

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

Type II: Nonrecognized Subsequent Events:

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

Subsequent events have been considered through February 24, 2012 for the statutory statement issued on February 24, 2012.

### 23. Reinsurance

Not applicable

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

Not applicable

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

Not applicable

### 26. Intercompany Pooling Arrangements

Not applicable

### 27. Structured Settlements

Not applicable

### 28. Health Care Receivables

Not applicable

## NOTES TO FINANCIAL STATEMENTS

### 29. Participating Policies

Not applicable

### 30. Premium Deficiency reserves

Not applicable

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

- (1) The Company waives deduction of deferred fractional premium upon death of life policy insureds and returns any premium beyond the date of death. Surrender values on policies do not exceed the corresponding benefit reserves.
- (2) For substandard lives, either extra premium is charged, or the gross premium for a rated age is charged. Mean reserves are determined by computing the regular mean reserve for the plan at any rated age and, in addition, holding one-half of any extra premium charge for the year.
- (3) As of December 31, 2011 and 2010, the Company had \$4,171,032 and \$4,226,936, respectively, of insurance in force for which the gross premiums are less than the net premiums according to the standard valuation set by the Department. Reserves to cover the difference as reported in exhibit 5, miscellaneous reserves section, were \$56,789 and \$60,737 as of December 31, 2011 and 2010, respectively, and were included in aggregate reserves.
- (4) The tabular interest has been determined by formula as described in the instructions for page 7.
- (5) Tabular interest on funds not involving life contingencies - Not applicable
- (6) The Company completed cash flow testing at December 31, 2011 and determined an additional reserve of \$500,000 was needed in response to the increase in expenses in 2011. The Company had no significant other reserve changes for the year ended December 31, 2010.

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

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

### 33. Premium and Annuity Considerations Deferred and Uncollected

The deferred and uncollected life insurance premiums as of December 31, 2011 were as follows:

<u>Type</u>	<u>Gross</u>	<u>Net of Loading</u>
Ordinary – new business	\$ -	\$ -
Ordinary – renewal	<u>62,854</u>	<u>48,273</u>
Total	<u>\$ 62,854</u>	<u>\$ 48,273</u>

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

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

### 34. Separate Accounts

Not applicable

### 35. Loss/Claim Adjustment Expenses

Not applicable

# 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. .... 12/31/2010
- 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. .... 12/31/2010
- 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). .... 02/07/2012
- 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 the name of the 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; ..... 14.7 %  
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 .....	Limited Liability 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
- 10.1 Has the insurer been granted any exemptions to the prohibited non-audit services provided by the certified independent public accountant requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation? ..... Yes [ ] No [ X ]
- 10.2 If the response to 10.1 is yes, provide information related to this exemption:  
.....
- 10.3 Has the insurer been granted any exemptions related to the other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 17A of the Model Regulation, or substantially similar state law or regulation? ..... Yes [ ] No [ X ]
- 10.4 If the response to 10.3 is yes, provide information related to this exemption:  
.....
- 10.5 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? ..... Yes [ X ] No [ ] N/A [ ]
- 10.6 If the response to 10.5 is no or n/a, please explain  
.....
11. 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 Thompson, FSA, MAAA  
Senior Actuary and Vice President  
Symetra National Life Insurance Company  
777 108th Avenue NE, Suite 1200  
MS: SC-14  
Bellevue, WA 98004 .....
- 12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? ..... Yes [ ] No [ X ]
- 12.11 Name of real estate holding company .....
- 12.12 Number of parcels involved .....
- 12.13 Total book/adjusted carrying value ..... \$ .....
- 12.2 If, yes provide explanation:  
.....
13. **FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:**
- 13.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?  
.....
- 13.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? ..... Yes [ ] No [ ]
- 13.3 Have there been any changes made to any of the trust indentures during the year? ..... Yes [ ] No [ ]
- 13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? ..... Yes [ ] No [ ] N/A [ ]
- 14.1 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.
- 14.11 If the response to 14.1 is No, please explain:  
.....
- 14.2 Has the code of ethics for senior managers been amended? ..... Yes [ ] No [ X ]
- 14.21 If the response to 14.2 is yes, provide information related to amendment(s).  
.....
- 14.3 Have any provisions of the code of ethics been waived for any of the specified officers? ..... Yes [ ] No [ X ]
- 14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).  
.....

**GENERAL INTERROGATORIES**

- 15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance with a NAIC rating of 3 or below? ..... Yes [ ] No [ X ]  
 15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount

**BOARD OF DIRECTORS**

16. 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 [ ]  
 17. 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 [ ]  
 18. 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 [ ]

**FINANCIAL**

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? ..... Yes [ ] No [ X ]  
 20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):  
     20.11 To directors or other officers.....\$ .....0  
     20.12 To stockholders not officers.....\$ .....0  
     20.13 Trustees, supreme or grand (Fraternal Only) .....\$ .....0  
 20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):  
     20.21 To directors or other officers.....\$ .....0  
     20.22 To stockholders not officers.....\$ .....0  
     20.23 Trustees, supreme or grand (Fraternal Only) .....\$ .....0  
 21.1 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 ]  
 21.2 If yes, state the amount thereof at December 31 of the current year:  
     21.21 Rented from others.....\$ .....  
     21.22 Borrowed from others.....\$ .....  
     21.23 Leased from others.....\$ .....  
     21.24 Other.....\$ .....  
 22.1 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 [ ]  
 22.2 If answer is yes:  
     22.21 Amount paid as losses or risk adjustment \$ .....0  
     22.22 Amount paid as expenses .....\$ .....2,902  
     22.23 Other amounts paid .....\$ .....0  
 23.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? ..... Yes [ ] No [ X ]  
 23.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: .....\$ .....

**INVESTMENT**

- 24.1 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 24.3)..... Yes [ X ] No [ ]  
 24.2 If no, give full and complete information relating thereto  
 .....  
 24.3 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 17 where this information is also provided) Reference notes .....  
 24.4 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 ]  
 24.5 If answer to 24.4 is yes, report amount of collateral for conforming programs. ....\$ .....  
 24.6 If answer to 24.4 is no, report amount of collateral for other programs. ....\$ .....  
 24.7 Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract? ..... Yes [ ] No [ ] N/A [ X ]  
 24.8 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? ..... Yes [ ] No [ ] N/A [ X ]  
 24.9 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities lending Agreement (MSLA) to conduct securities lending? ..... Yes [ ] No [ ] N/A [ X ]

**GENERAL INTERROGATORIES**

25.1 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 21.1 and 24.3) ..... Yes [ X ] No [ ]

25.2 If yes, state the amount thereof at December 31 of the current year:

	25.21 Subject to repurchase agreements .....\$ .....0
	25.22 Subject to reverse repurchase agreements .....\$ .....0
	25.23 Subject to dollar repurchase agreements .....\$ .....0
	25.24 Subject to reverse dollar repurchase agreements .....\$ .....0
	25.25 Pledged as collateral .....\$ .....0
	25.26 Placed under option agreements .....\$ .....0
	25.27 Letter stock or other securities restricted as to sale ...\$ .....0
	25.28 On deposit with state or other regulatory body .....\$ .....2,372,857
	25.29 Other .....\$ .....0

25.3 For category (25.27) provide the following:

1 Nature of Restriction	2 Description	3 Amount

26.1 Does the reporting entity have any hedging transactions reported on Schedule DB? ..... Yes [ ] No [ X ]

26.2 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.

27.1 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 ]

27.2 If yes, state the amount thereof at December 31 of the current year. ....\$ .....

28. 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 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook?..... Yes [ X ] No [ ]

28.01 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 .....	4 New York Plaza - 12 Floor Mail Code NY1-E290 New York, NY 10004-2413 .....

28.02 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)

28.03 Have there been any changes, including name changes, in the custodian(s) identified in 28.01 during the current year?..... Yes [ ] No [ X ]

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

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

28.05 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 .....
138756 .....	Pioneer Investment Management Inc. ....	60 State Street Boston, MA 02109 .....
106595 .....	Wellington Management Company, LLP .....	75 State Street Boston, MA 02109 .....



ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company  
**GENERAL INTERROGATORIES**

- 29.1 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 [ X ]
- 29.2 If yes, complete the following schedule:

1 CUSIP #	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
29.2999 - Total		0

- 29.3 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

30. 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 (+)
30.1 Bonds .....	15,082,475	16,163,065	1,080,590
30.2 Preferred stocks .....	.0	.0	.0
30.3 Totals	15,082,475	16,163,065	1,080,590

- 30.4 Describe the sources or methods utilized in determining the fair values:

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

- 31.1 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 ]

- 31.2 If the answer to 31.1 is 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 [ ]

- 31.3 If the answer to 31.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:  
 We utilize a nationally recognized independent third party pricing service for the majority of the prices used to determine fair value. We gain assurance on the overall reasonableness and consistent application of input assumptions, valuation methodologies and compliance with accounting standards for fair value determination through various processes including, but not limited to, evaluation of pricing methodologies, analytical reviews of certain prices and back-testing of selected sales activity to determine whether there are any significant differences between the market price used to value the security prior to sale and the actual sales prices. ....

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

- 32.2 If no, list exceptions:  
 .....

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company  
**GENERAL INTERROGATORIES**

**OTHER**

33.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any? .....\$ .....0

33.2 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

34.1 Amount of payments for legal expenses, if any? .....\$ .....2,650

34.2 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

35.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? .....\$ .....0

35.2 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

# 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 .....		
2.2 Premium Denominator .....	285,156	297,410
2.3 Premium Ratio (2.1/2.2) .....	0.000	0.000
2.4 Reserve Numerator .....		
2.5 Reserve Denominator .....	4,952,486	4,853,251
2.6 Reserve Ratio (2.4/2.5) .....	0.000	0.000

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

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

3.3 What 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? ..... \$

3.4 State the authority under which Separate Accounts are maintained:  
.....

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

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

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 ..... \$ 125,287

4.22 Received ..... \$ 0

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

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

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

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

6. FOR STOCK REPORTING ENTITIES ONLY:

6.1 Total amount paid in by stockholders as surplus funds since organization of the reporting entity: ..... \$ 4,500,000

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

7.11 Cash ..... \$ 19,585,835

7.12 Stock ..... \$ 0

## 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 [ ] No [ X ]

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

Type		3	4	5	6	7	8	9
1 Guaranteed Death Benefit	2 Guaranteed Living Benefit	Waiting Period Remaining	Account Value Related to Col. 3	Total Related Account Values	Gross Amount of Reserve	Location of Reserve	Portion Reinsured	Reinsurance Reserve Credit
.....	.....	.....	.....	.....	.....	.....	.....	.....

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: ..... \$ .....

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	.....

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. .... \$ .....

**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 2011	2 2010	3 2009	4 2008	5 2007
<b>Life Insurance in Force</b> (Exhibit of Life Insurance)					
1. Ordinary - whole life and endowment (Line 34, Col. 4) .....	18,275	20,217	20,218	21,341	22,543
2. Ordinary - term (Line 21, Col. 4, less Line 34, Col. 4) .....	13,282	13,642	15,700	16,723	18,196
3. Credit life (Line 21, Col. 6) .....					
4. Group, excluding FEGLI/SGLI (Line 21, Col. 9 less Lines 43 & 44, Col. 4) .....					
5. Industrial (Line 21, Col. 2) .....					
6. FEGLI/SGLI (Lines 43 & 44, Col. 4) .....					
7. Total (Line 21, Col. 10) .....	31,557	33,859	35,918	38,064	40,739
<b>New Business Issued</b> (Exhibit of Life Insurance)					
8. Ordinary - whole life and endowment (Line 34, Col. 2) .....					
9. Ordinary - term (Line 2, Col. 4, less Line 34, Col. 2) .....					
10. Credit life (Line 2, Col. 6) .....					
11. Group (Line 2, Col. 9) .....					
12. Industrial (Line 2, Col. 2) .....					
13. Total (Line 2, Col. 10) .....					
<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) .....	285,156	297,410	316,302	338,945	374,131
15.2 Ordinary-individual annuities (Line 20.4, Col. 4) .....					
16. Credit life (group and individual) (Line 20.4, Col. 5) .....					
17.1 Group life insurance (Line 20.4, Col. 6) .....					
17.2 Group annuities (Line 20.4, Col. 7) .....					
18.1 A & H-group (Line 20.4, Col. 8) .....					
18.2 A & H-credit (group and individual) (Line 20.4, Col. 9) .....					
18.3 A & H-other (Line 20.4, Col. 10) .....					
19. Aggregate of all other lines of business (Line 20.4, Col. 11) .....					
20. Total .....	285,156	297,410	316,302	338,945	374,131
<b>Balance Sheet (Pages 2 &amp; 3)</b>					
21. Total admitted assets excluding Separate Accounts business (Page 2, Line 26, Col. 3) .....	16,370,117	17,136,479	16,784,114	17,364,526	16,807,590
22. Total liabilities excluding Separate Accounts business (Page 3, Line 26) .....	6,919,886	6,385,341	6,540,528	6,379,325	6,303,626
23. Aggregate life reserves (Page 3, Line 1) .....	6,744,742	6,178,641	6,339,708	6,148,298	6,102,752
24. Aggregate A & H reserves (Page 3, Line 2) .....					
25. Deposit-type contract funds (Page 3, Line 3) .....					
26. Asset valuation reserve (Page 3, Line 24.01) .....	34,826	48,197	50,491	40,096	33,010
27. Capital (Page 3, Lines 29 and 30) .....	2,500,000	2,500,000	2,500,000	2,500,000	2,500,000
28. Surplus (Page 3, Line 37) .....	6,950,231	8,251,138	7,743,586	8,485,201	8,003,964
<b>Cash Flow (Page 5)</b>					
29. Net Cash from Operations (Line 11) .....	289,018	414,469	482,556	526,134	496,856
<b>Risk-Based Capital Analysis</b>					
30. Total adjusted capital .....	9,485,056	10,799,335	10,294,077	11,025,297	10,536,974
31. Authorized control level risk - based capital .....	80,679	97,629	115,373	103,055	78,862
<b>Percentage Distribution of Cash, Cash Equivalents and Invested Assets</b> (Page 2, Col. 3) (Line No. /Page 2, Line 12, Col. 3) x 100.0					
32. Bonds (Line 1) .....	93.4	97.4	93.4	92.2	91.6
33. Stocks (Lines 2.1 and 2.2) .....			3.0	2.9	3.0
34. Mortgage loans on real estate(Lines 3.1 and 3.2 ) .....					
35. Real estate (Lines 4.1, 4.2 and 4.3) .....					
36. Cash, cash equivalents and short-term investments (Line 5) .....	2.3	1.5	2.3	3.6	2.3
37. Contract loans (Line 6) .....	1.0	1.0	1.2	1.2	1.3
38. Derivatives (Page 2, Line 7) .....			XXX	XXX	XXX
39. Other invested assets (Line 8) .....					
40. Receivables for securities (Line 9) .....	3.3	0.1	0.1	0.1	1.9
41. Securities lending reinvested collateral assets (Line 10) .....			XXX	XXX	XXX
42. Aggregate write-ins for invested assets (Line 11) .....					
43. Cash, cash equivalents and invested assets (Line 12) .....	100.0	100.0	100.0	100.0	100.0

**FIVE-YEAR HISTORICAL DATA**

(Continued)

	1 2011	2 2010	3 2009	4 2008	5 2007
<b>Investments in Parent, Subsidiaries and Affiliates</b>					
44. Affiliated bonds (Schedule D Summary, Line 12, Col. 1) .....					
45. Affiliated preferred stocks (Schedule D Summary, Line 18, Col. 1) .....					
46. Affiliated common stocks (Schedule D Summary Line 24, Col. 1), .....					
47. Affiliated short-term investments (subtotal included in Schedule DA Verification, Col. 5, Line 10) .....					
48. Affiliated mortgage loans on real estate .....					
49. All other affiliated .....					
50. Total of above Lines 44 to 49 .....					
<b>Total Nonadmitted and Admitted Assets</b>					
51. Total nonadmitted assets (Page 2, Line 28, Col. 2) ..	811,766	634,006	650,406	643,731	682,829
52. Total admitted assets (Page 2, Line 28, Col. 3) .....	16,370,117	17,136,479	16,784,114	17,364,526	16,807,590
<b>Investment Data</b>					
53. Net investment income (Exhibit of Net Investment Income) .....	692,796	799,097	820,443	859,671	885,151
54. Realized capital gains (losses) (Page 4, Line 34, Column 1) .....	(3,386)	(7,004)	(1,048)	(398)	(885)
55. Unrealized capital gains (losses) (Page 4, Line 38, Column 1) .....					
56. Total of above Lines 53, 54 and 55 .....	689,410	792,093	819,395	859,273	884,266
<b>Benefits and Reserve Increases (Page 6)</b>					
57. 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) .....	351,572	298,112	257,109	192,854	256,963
58. Total contract benefits - A & H (Lines 13 & 14, Cols. 9, 10 & 11) .....					
59. Increase in life reserves - other than group and annuities (Line 19, Cols. 2 and 3) .....	566,101	(161,067)	191,410	45,546	51,425
60. Increase in A & H reserves (Line 19, Cols. 9, 10 & 11) .....					
61. Dividends to policyholders (Line 30, Col. 1) .....					
<b>Operating Percentages</b>					
62. 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 .....	71.3	50.1	57.7	61.4	59.3
63. 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 .....	5.4	3.2	4.3	5.3	5.5
64. A & H loss percent (Schedule H, Part 1, Lines 5 and 6, Col. 2) .....					
65. A & H cost containment percent (Schedule H, Pt. 1, Line 4, Col. 2) .....					
66. A & H expense percent excluding cost containment expenses (Schedule H, Pt. 1, Line 10, Col. 2) .....					
<b>A &amp; H Claim Reserve Adequacy</b>					
67. Incurred losses on prior years' claims - group health (Schedule H, Part 3, Line 3.1 Col. 2) .....					
68. Prior years' claim liability and reserve - group health (Schedule H, Part 3, Line 3.2 Col. 2) .....					
69. Incurred losses on prior years' claims-health other than group (Schedule H, Part 3, Line 3.1 Col. 1 less Col. 2) .....					
70. Prior years' claim liability and reserve-health other than group (Schedule H, Part 3, Line 3.2 Col. 1 less Col. 2) .....					
<b>Net Gains From Operations After Federal Income Taxes by Lines of Business (Page 6, Line 33)</b>					
71. Industrial life (Col. 2) .....					
72. Ordinary - life (Col. 3) .....	(318,203)	517,040	242,043	470,633	454,188
73. Ordinary - individual annuities (Col. 4) .....					
74. Ordinary-supplementary contracts (Col. 5) .....					
75. Credit life (Col. 6) .....					
76. Group life (Col. 7) .....					
77. Group annuities (Col. 8) .....					
78. A & H-group (Col. 9) .....					
79. A & H-credit (Col. 10) .....					
80. A & H-other (Col. 11) .....					
81. Aggregate of all other lines of business (Col. 12) ....					
82. Total (Col. 1) .....	(318,203)	517,040	242,043	470,633	454,188

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 2011 OF THE Symetra National Life Insurance Company**

DIRECT BUSINESS IN THE STATE OF Grand Total

DURING THE YEAR 2011

NAIC Group Code 1129

**LIFE INSURANCE**

NAIC Company Code 90581

DIRECT PREMIUMS AND ANNUITY CONSIDERATIONS	1	2	3	4	5
	Ordinary	Credit Life (Group and Individual)	Group	Industrial	Total
1. Life insurance	282,539				282,539
2. Annuity considerations					
3. Deposit-type contract funds		XXX		XXX	
4. Other considerations					
5. Totals (Sum of Lines 1 to 4)	282,539				282,539
<b>DIRECT DIVIDENDS TO POLICYHOLDERS</b>					
Life insurance:					
6.1 Paid in cash or left on deposit					
6.2 Applied to pay renewal premiums					
6.3 Applied to provide paid-up additions or shorten the endowment or premium-paying period					
6.4 Other					
6.5 Totals (Sum of Lines 6.1 to 6.4)					
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)					
<b>DIRECT CLAIMS AND BENEFITS PAID</b>					
9. Death benefits	186,910				186,910
10. Matured endowments					
11. Annuity benefits					
12. Surrender values and withdrawals for life contracts	129,282				129,282
13. Aggregate write-ins for miscellaneous direct claims and benefits paid					
14. All other benefits, except accident and health	5,380				5,380
15. Totals	321,572				321,572
<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										
17. Incurred during current year	11	216,910							11	216,910
Settled during current year:										
18.1 By payment in full	9	186,910							9	186,910
18.2 By payment on compromised claims										
18.3 Totals paid	9	186,910							9	186,910
18.4 Reduction by compromise										
18.5 Amount rejected										
18.6 Total settlements	9	186,910							9	186,910
19. Unpaid Dec. 31, current year (16+17-18.6)	2	30,000							2	30,000
<b>POLICY EXHIBIT</b>										
20. In force December 31, prior year	2,347	33,857,672	(a)		No. of Policies				2,347	33,857,672
21. Issued during year										
22. Other changes to in force (Net)	(125)	(2,300,883)							(125)	(2,300,883)
23. In force December 31 of current year	2,222	31,556,789	(a)						2,222	31,556,789

(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)					
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)					
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)					
26. Totals (Lines 24 + 24.1 + 24.2 + 24.3 + 24.4 + 25.6)					

(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 .....0 .

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company

**EXHIBIT OF LIFE INSURANCE**

	Industrial		Ordinary		Credit Life (Group and Individual)		Group			10
	1	2	3	4	5	6	Number of		9	Total Amount of Insurance (a)
	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 .....			2,347	33,859						33,859
2. Issued during year .....										
3. Reinsurance assumed .....										
4. Revived during year .....			1	20						20
5. Increased during year (net) .....										
6. Subtotals, Lines 2 to 5 .....			1	20						20
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) .....			2,348	33,879						33,879
Deductions during year:										
10. Death .....			10	217			XXX			217
11. Maturity .....			5	50			XXX			50
12. Disability .....							XXX			
13. Expiry .....			25	259						259
14. Surrender .....			86	1,755						1,755
15. Lapse .....										
16. Conversion .....							XXX	XXX	XXX	
17. Decreased (net) .....				41						41
18. Reinsurance .....										
19. Aggregate write-ins for decreases .....										
20. Totals (Lines 10 to 19) .....			126	2,322						2,322
21. In force end of year (Line 9 minus Line 20) .....			2,222	31,557						31,557
22. Reinsurance ceded end of year .....	XXX		XXX		XXX		XXX	XXX		
23. Line 21 minus Line 22 .....	XXX		XXX	31,557	XXX	(b)	XXX	XXX		31,557
<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 2011 OF THE Symetra National 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	
25. Other paid-up insurance .....			581	6,161
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 .....			14	97
28. Term policies - other .....			809	13,141
29. Other term insurance - decreasing .....	XXX		XXX	
30. Other term insurance .....	XXX		XXX	44
31. Totals (Lines 27 to 30) .....			823	13,282
32. Reconciliation to Lines 2 and 21:				
32. Term additions .....	XXX		XXX	
33. Totals, extended term insurance .....	XXX	XXX		
34. Totals, whole life and endowment .....			1,399	18,275
35. Totals (Lines 31 to 34) .....			2,222	31,557

**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 .....			31,557	
38. Credit Life (Group and Individual) .....				
39. Group .....				
40. Totals (Lines 36 to 39) .....			31,557	

**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
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 .....				

**NONE**

**ADDITIONAL ACCIDENTAL DEATH BENEFITS**

46. Amount of additional accidental death benefits in force end of year under ordinary policies .....	
---	--

**NONE**

**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 .....	
47.2 .....	

**NONE**

**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 .....			410	9,882				
49. Disability Income .....								
50. Extended Benefits .....			XXX	XXX				
51. Other .....								
52. Total .....		(b)	410	(b) 9,882		(b)		(b)

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

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

Exhibit of Number of Policies, Contracts, ...Supplementary Contracts

**N O N E**

Exhibit of Number of Policies, Contracts, ...Annuities

**N O N E**

Exhibit of Number of Policies, Contracts, ...Accident and Health Insurance

**N O N E**

Exhibit of Number of Policies, Contracts, ...Deposit Funds

**N O N E**

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company  
**FORM FOR CALCULATING THE INTEREST MAINTENANCE RESERVE**

**INTEREST MAINTENANCE RESERVE**

	1 Amount
1. Reserve as of December 31, Prior Year .....	66,066
2. Current year's realized pre-tax capital gains/(losses) of \$ .....1,006 transferred into the reserve net of taxes of \$ .....352 .....	654
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) .....	66,720
5. Current year's amortization released to Summary of Operations (Amortization, Line 1, Column 4) .....	6,893
6. Reserve as of December 31, current year (Line 4 minus Line 5)	59,827

**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. 2011 .....	6,874	19		6,893
2. 2012 .....	3,602	38		3,640
3. 2013 .....	4,025	40		4,065
4. 2014 .....	5,030	42		5,072
5. 2015 .....	5,463	44		5,506
6. 2016 .....	5,991	46		6,037
7. 2017 .....	6,590	49		6,640
8. 2018 .....	6,985	51		7,036
9. 2019 .....	6,747	53		6,800
10. 2020 .....	5,736	56		5,792
11. 2021 .....	4,417	59		4,476
12. 2022 .....	2,957	55		3,012
13. 2023 .....	1,366	44		1,410
14. 2024 .....	275	33		308
15. 2025 .....	7	20		27
16. 2026 .....		7		7
17. 2027 .....				
18. 2028 .....				
19. 2029 .....				
20. 2030 .....				
21. 2031 .....				
22. 2032 .....				
23. 2033 .....				
24. 2034 .....				
25. 2035 .....				
26. 2036 .....				
27. 2037 .....				
28. 2038 .....				
29. 2039 .....				
30. 2040 .....				
31. 2041 and Later				
32. Total (Lines 1 to 31)	66,066	654		66,720

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 .....	48,197		48,197				48,197
2. Realized capital gains/(losses) net of taxes - General Account .....							
3. Realized capital gains/(losses) net of taxes - Separate Accounts .....							
4. Unrealized capital gains/(losses) net of deferred taxes - General Account .....							
5. Unrealized capital gains/(losses) net of deferred taxes - Separate Accounts .....							
6. Capital gains credited/(losses charged) to contract benefits, payments or reserves .....							
7. Basic contribution .....	4,984		4,984				4,984
8. Accumulated balances (Lines 1 through 5 - 6 + 7) .....	53,181		53,181				53,181
9. Maximum reserve .....	34,825		34,825				34,825
10. Reserve objective .....	26,165		26,165				26,165
11. 20% of (Line 10 - Line 8) .....	(5,403)		(5,403)				(5,403)
12. Balance before transfers (Lines 8 + 11) .....	47,778		47,778				47,778
13. Transfers .....							XXX
14. Voluntary contribution .....							
15. Adjustment down to maximum/up to zero .....	(12,952)		(12,952)				(12,952)
16. Reserve as of December 31, current year (Lines 12 + 13 + 14 + 15)	34,826		34,826				34,826

**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 .....	4,446,278	XXX	XXX	4,446,278	0.0000		0.0000		0.0000	
2.	1	Highest Quality .....	10,133,517	XXX	XXX	10,133,517	0.0004	4,053	0.0023	23,307	0.0030	30,401
3.	2	High Quality .....	486,148	XXX	XXX	486,148	0.0019	924	0.0058	2,820	0.0090	4,375
4.	3	Medium Quality .....		XXX	XXX		0.0093		0.0230		0.0340	
5.	4	Low Quality .....		XXX	XXX		0.0213		0.0530		0.0750	
6.	5	Lower Quality .....		XXX	XXX		0.0432		0.1100		0.1700	
7.	6	In or Near Default .....		XXX	XXX		0.0000		0.2000		0.2000	
8.		Total Unrated Multi-class Securities Acquired by Conversion .....		XXX	XXX		XXX		XXX		XXX	
9.		Total Bonds (Sum of Lines 1 through 8)	15,065,943	XXX	XXX	15,065,943	XXX	4,977	XXX	26,127	XXX	34,776
PREFERRED STOCK												
10.	1	Highest Quality .....		XXX	XXX		0.0004		0.0023		0.0030	
11.	2	High Quality .....		XXX	XXX		0.0019		0.0058		0.0090	
12.	3	Medium Quality .....		XXX	XXX		0.0093		0.0230		0.0340	
13.	4	Low Quality .....		XXX	XXX		0.0213		0.0530		0.0750	
14.	5	Lower Quality .....		XXX	XXX		0.0432		0.1100		0.1700	
15.	6	In or Near Default .....		XXX	XXX		0.0000		0.2000		0.2000	
16.		Affiliated Life with AVR .....		XXX	XXX		0.0000		0.0000		0.0000	
17.		Total Preferred Stocks (Sum of Lines 10 through 16)		XXX	XXX		XXX		XXX		XXX	
SHORT - TERM BONDS												
18.		Exempt Obligations .....		XXX	XXX		0.0000		0.0000		0.0000	
19.	1	Highest Quality .....	16,532	XXX	XXX	16,532	0.0004	7	0.0023	38	0.0030	50
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)	16,532	XXX	XXX	16,532	XXX	7	XXX	38	XXX	50

**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 .....		XXX	XXX		0.0004		0.0023		0.0030	
27.	1	Highest Quality .....		XXX	XXX		0.0004		0.0023		0.0030	
28.	2	High Quality .....		XXX	XXX		0.0019		0.0058		0.0090	
29.	3	Medium Quality .....		XXX	XXX		0.0093		0.0230		0.0340	
30.	4	Low Quality .....		XXX	XXX		0.0213		0.0530		0.0750	
31.	5	Lower Quality .....		XXX	XXX		0.0432		0.1100		0.1700	
32.	6	In or Near Default .....		XXX	XXX		0.0000		0.2000		0.2000	
33.		Total Derivative Instruments .....		XXX	XXX		XXX		XXX		XXX	
34.		Total (Lines 9 + 17 + 25 + 33)	15,082,475	XXX	XXX	15,082,475	XXX	4,984	XXX	26,165	XXX	34,825
<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 .....			XXX		0.0063 (a)		0.0120 (a)		0.0190 (a)	
40.		In Good Standing With Restructured Terms .....			XXX		0.2800 (b)		0.6200 (b)		1.0000 (b)	
Overdue, Not in Process:												
41.		Farm Mortgages .....			XXX		0.0420		0.0760		0.1200	
42.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0005		0.0012		0.0020	
43.		Residential Mortgages - All Other .....			XXX		0.0025		0.0058		0.0090	
44.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0005		0.0012		0.0020	
45.		Commercial Mortgages - All Other .....			XXX		0.0420		0.0760		0.1200	
In Process of Foreclosure:												
46.		Farm Mortgages .....			XXX		0.0000		0.1700		0.1700	
47.		Residential Mortgages - Insured or Guaranteed .....			XXX		0.0000		0.0040		0.0040	
48.		Residential Mortgages - All Other .....			XXX		0.0000		0.0130		0.0130	
49.		Commercial Mortgages - Insured or Guaranteed .....			XXX		0.0000		0.0040		0.0040	
50.		Commercial Mortgages - All Other .....			XXX		0.0000		0.1700		0.1700	
51.		Total Schedule B Mortgages (Sum of Lines 35 through 50)			XXX		XXX		XXX		XXX	
52.		Schedule DA Mortgages			XXX		(c)		(c)		(c)	
53.		Total Mortgage Loans on Real Estate (Lines 51 + 52)			XXX		XXX		XXX		XXX	

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

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

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

Asset Valuation Reserve – Equity Component

**N O N E**

Asset Valuation Reserve Replications (Synthetic) Assets

**N O N E**

Schedule F - Claims

**N O N E**

Schedule H – Part 1 – Analysis of Underwriting Operations

**N O N E**

Schedule H – Part 2 – Reserves and Liabilities

**N O N E**

Schedule H – Part 3 – Prior Year’s Claim Reserve and Liabilities

**N O N E**

Schedule H – Part 4 – Reinsurance

**N O N E**

Schedule H – Part 5 – Health Claims

**N O N E**

Schedule S – Part 1 – Section 1

**N O N E**

Schedule S – Part 1 – Section 2

**N O N E**

Schedule S – Part 2

**N O N E**

Schedule S – Part 3 – Section 1

**N O N E**

Schedule S – Part 3 – Section 2

**N O N E**

Schedule S – Part 4

**N O N E**

Schedule S – Part 5

**N O N E**

**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 12) .....	16,137,562		16,137,562
2. Reinsurance (Line 16) .....			
3. Premiums and considerations (Line 15) .....	48,273		48,273
4. Net credit for ceded reinsurance .....	XXX		
5. All other admitted assets (balance) .....	184,282		184,282
6. Total assets excluding Separate Accounts (Line 26) .....	16,370,117		16,370,117
7. Separate Account assets (Line 27) .....			
8. Total assets (Line 28)	16,370,117		16,370,117
<b>LIABILITIES, CAPITAL AND SURPLUS (Page 3)</b>			
9. Contract reserves (Lines 1 and 2) .....	6,744,742		6,744,742
10. Liability for deposit-type contracts (Line 3) .....			
11. Claim reserves (Line 4) .....	32,000		32,000
12. Policyholder dividends/reserves (Lines 5 through 7) .....			
13. Premium & annuity considerations received in advance (Line 8) .....	4,015		4,015
14. Other contract liabilities (Line 9) .....	59,827		59,827
15. Reinsurance in unauthorized companies (Line 24.02) .....			
16. Funds held under reinsurance treaties with unauthorized reinsurers (Line 24.03) .....			
17. All other liabilities (balance) .....	79,302		79,302
18. Total liabilities excluding Separate Accounts (Line 26) .....	6,919,886		6,919,886
19. Separate Account liabilities (Line 27) .....			
20. Total liabilities (Line 28) .....	6,919,886		6,919,886
21. Capital & surplus (Line 38) .....	9,450,231	XXX	9,450,231
22. Total liabilities, capital & surplus (Line 39)	16,370,117		16,370,117
<b>NET CREDIT FOR CEDED REINSURANCE</b>			
23. Contract reserves .....			
24. Claim reserves .....			
25. Policyholder dividends/reserves .....			
26. Premium & annuity considerations received in advance .....			
27. Liability for deposit-type contracts .....			
28. Other contract liabilities .....			
29. Reinsurance ceded assets .....			
30. Other ceded reinsurance recoverables .....			
31. Total ceded reinsurance recoverables .....			
32. Premiums and considerations .....			
33. Reinsurance in unauthorized companies .....			
34. Funds held under reinsurance treaties with unauthorized reinsurers .....			
35. Other ceded reinsurance payables/offsets .....			
36. Total ceded reinsurance payable/offsets .....			
37. Total net credit for ceded reinsurance			



**ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company**  
**SCHEDULE T - PREMIUMS AND ANNUITY CONSIDERATIONS**

Allocated by States and Territories

States, Etc.	1	Direct Business Only					7
		Life Contracts		4	5	6	
		2	3				
Active Status	Life Insurance Premiums	Annuity Considerations	Accident and Health Insurance Premiums, Including Policy, Membership and Other Fees	Other Considerations	Total Columns 2 through 5	Deposit-Type Contracts	
1. Alabama	AL	L	12,770				12,770
2. Alaska	AK	N	173				173
3. Arizona	AZ	L	1,804				1,804
4. Arkansas	AR	L	1,119				1,119
5. California	CA	L	25,730				25,730
6. Colorado	CO	L	2,291				2,291
7. Connecticut	CT	L	6,737				6,737
8. Delaware	DE	L	128				128
9. District of Columbia	DC	L					
10. Florida	FL	L	11,623				11,623
11. Georgia	GA	L	12,354				12,354
12. Hawaii	HI	N					
13. Idaho	ID	L	4,782				4,782
14. Illinois	IL	L	15,032				15,032
15. Indiana	IN	L	2,469				2,469
16. Iowa	IA	N	2,426				2,426
17. Kansas	KS	L	4,771				4,771
18. Kentucky	KY	L	2,880				2,880
19. Louisiana	LA	L	5,926				5,926
20. Maine	ME	N					
21. Maryland	MD	L	6,897				6,897
22. Massachusetts	MA	N	138				138
23. Michigan	MI	L	705				705
24. Minnesota	MN	L	828				828
25. Mississippi	MS	L	6,545				6,545
26. Missouri	MO	L	29,208				29,208
27. Montana	MT	L	313				313
28. Nebraska	NE	L	166				166
29. Nevada	NV	L	3,200				3,200
30. New Hampshire	NH	N	59				59
31. New Jersey	NJ	N	159				159
32. New Mexico	NM	L	1,615				1,615
33. New York	NY	N	1,127				1,127
34. North Carolina	NC	L	6,002				6,002
35. North Dakota	ND	L					
36. Ohio	OH	L	4,370				4,370
37. Oklahoma	OK	L	1,828				1,828
38. Oregon	OR	L	11,753				11,753
39. Pennsylvania	PA	L	399				399
40. Rhode Island	RI	N					
41. South Carolina	SC	L	2,862				2,862
42. South Dakota	SD	L					
43. Tennessee	TN	L	21,043				21,043
44. Texas	TX	L	12,650				12,650
45. Utah	UT	L	1,149				1,149
46. Vermont	VT	N					
47. Virginia	VA	L	7,170				7,170
48. Washington	WA	L	43,016				43,016
49. West Virginia	WV	L	455				455
50. Wisconsin	WI	L	3,533				3,533
51. Wyoming	WY	N	1,332				1,332
52. American Samoa	AS	N					
53. Guam	GU	N					
54. Puerto Rico	PR	N					
55. U.S. Virgin Islands	VI	N					
56. Northern Mariana Islands	MP	N					
57. Canada	CN	N	1,002				1,002
58. Aggregate Other Alien	OT	XXX					
59. Subtotal	(a)	40	282,539				282,539
90. Reporting entity contributions for employee benefits plans	XXX						
91. Dividends or refunds applied to purchase paid-up additions and annuities	XXX						
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	5,380					5,380
94. Aggregate or other amounts not allocable by State	XXX						
95. Totals (Direct Business)	XXX	287,919					287,919
96. Plus reinsurance assumed	XXX						
97. Totals (All Business)	XXX	287,919					287,919
98. Less reinsurance ceded	XXX						
99. Totals (All Business) less Reinsurance Ceded	XXX	287,919		(b)			287,919
<b>DETAILS OF WRITE-INS</b>							
5801.		XXX					
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					
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					

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

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

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

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

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

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

Allocated by States and Territories

States, Etc.		Direct Business Only					Totals
		1 Life (Group and Individual)	2 Annuities (Group and Individual)	3 Disability Income (Group and Individual)	4 Long-Term Care (Group and Individual)	5 Deposit-Type Contracts	
1. Alabama	AL	12,770					12,770
2. Alaska	AK	173					173
3. Arizona	AZ	1,804					1,804
4. Arkansas	AR	1,119					1,119
5. California	CA	25,730					25,730
6. Colorado	CO	2,291					2,291
7. Connecticut	CT	6,737					6,737
8. Delaware	DE	128					128
9. District of Columbia	DC						
10. Florida	FL	11,623					11,623
11. Georgia	GA	12,354					12,354
12. Hawaii	HI						
13. Idaho	ID	4,782					4,782
14. Illinois	IL	15,032					15,032
15. Indiana	IN	2,469					2,469
16. Iowa	IA	2,426					2,426
17. Kansas	KS	4,771					4,771
18. Kentucky	KY	2,880					2,880
19. Louisiana	LA	5,926					5,926
20. Maine	ME						
21. Maryland	MD	6,897					6,897
22. Massachusetts	MA	138					138
23. Michigan	MI	705					705
24. Minnesota	MN	828					828
25. Mississippi	MS	6,545					6,545
26. Missouri	MO	29,208					29,208
27. Montana	MT	313					313
28. Nebraska	NE	166					166
29. Nevada	NV	3,200					3,200
30. New Hampshire	NH	59					59
31. New Jersey	NJ	159					159
32. New Mexico	NM	1,615					1,615
33. New York	NY	1,127					1,127
34. North Carolina	NC	6,002					6,002
35. North Dakota	ND						
36. Ohio	OH	4,370					4,370
37. Oklahoma	OK	1,828					1,828
38. Oregon	OR	11,753					11,753
39. Pennsylvania	PA	399					399
40. Rhode Island	RI						
41. South Carolina	SC	2,862					2,862
42. South Dakota	SD						
43. Tennessee	TN	21,043					21,043
44. Texas	TX	12,650					12,650
45. Utah	UT	1,149					1,149
46. Vermont	VT						
47. Virginia	VA	7,170					7,170
48. Washington	WA	43,016					43,016
49. West Virginia	WV	455					455
50. Wisconsin	WI	3,533					3,533
51. Wyoming	WY	1,332					1,332
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	1,002					1,002
58. Aggregate Other Alien	OT						
59. Total		282,539					282,539

**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	10% or greater owners of record (excludes shares held in "street name" by brokerage firms and other intermediaries): White Mountains Insurance Group, LTD.* and Berkshire Hathaway, Inc.
Symetra Life Insurance Company	91-0742147	68608	WA	100% Symetra Financial Corporation
Symetra National Life Insurance Company	91-1079693	90581	WA	100% Symetra Life Insurance Company
First Symetra National Life Insurance Company of New York	91-1367496	78417	NY	100% Symetra Life Insurance Company
Symetra Assigned Benefits Service Company	91-1246870		WA	100% Symetra Financial Corporation
Symetra Administrative Services, Inc.	91-1364981		WA	100% Symetra Financial Corporation
Symetra Securities, Inc.	91-0824835		WA	100% Symetra Financial Corporation
Symetra Investment Management, Inc.	36-4715812		WA	100% Symetra Financial Corporation
Symetra Investment Services, Inc.	91-1354455		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

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company

**SCHEDULE Y**

**PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM**

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
.1129	WHITE MOUNTAINS GROUP	.68608	20-0978027 91-0742147		0001403385	NYSE	SYMETRA FINANCIAL CORPORATION SYMETRA LIFE INSURANCE COMPANY SYMETRA NATIONAL LIFE INSURANCE COMPANY	WIA	UIP UDP	SYMETRA FINANCIAL CORPORATION	Board of Directors Ownership	.000 100.000	WHITE MOUNTAINS INSURANCE GROUP, LTD. SYMETRA FINANCIAL CORPORATION	1
.1129	WHITE MOUNTAINS GROUP	.90581	91-1079693				FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY OF NEW YORK SYMETRA ASSIGNED BENEFITS SERVICE COMPANY	WIA		SYMETRA LIFE INSURANCE COMPANY			SYMETRA FINANCIAL CORPORATION	
.1129	WHITE MOUNTAINS GROUP	.78417	91-1367496				SYMETRA ADMINISTRATIVE SERVICES, INC.	NY	IA	SYMETRA LIFE INSURANCE COMPANY	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			91-1246870				SYMETRA FINANCIAL CORPORATION	WIA	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			91-1364981				SYMETRA SECURITIES, INC.	WIA	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			91-0824835				SYMETRA INVESTMENT MANAGEMENT, INC.	WIA	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			36-4715812				SYMETRA INVESTMENT SERVICES, INC.	WIA	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			91-1354455				CLEARSCAPE FUNDING CORPORATION	WIA	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			20-3820455				WSF RECEIVABLES I, LLC	FL	NIA	CLEARSCAPE FUNDING CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			26-1099574				HEALTH NETWORK STRATEGIES, LLC	DE	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	.60.000	SYMETRA FINANCIAL CORPORATION	2
			20-8947838				MEDICAL RISK MANAGERS, INC	DE	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			51-0309072				TIF INVEST III, LLC	DE	NIA	SYMETRA FINANCIAL CORPORATION	Ownership	100.000	SYMETRA FINANCIAL CORPORATION	
			26-3530060											

Asterisk	Explanation
1	Applicable to columns 11 through 14: General Reinsurance Corporation is the direct owner of 21%, including exercisable warrants. General Reinsurance Corporation's ultimate controlling person, Berkshire Hathaway, Inc., has filed a Disclaimer of Control with the reporting person's domiciliary jurisdiction. White Mountains Insurance Group, Ltd. is the beneficial owner of 21%, including exercisable warrants. No direct owner whose ultimate controlling person is White Mountains Insurance Group, Ltd. has ownership of 10% or greater.
2	40% owned by non-affiliated members.

**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	52,000,000	(4,434,512)							47,565,488	
68608	91-0742147	Symetra Life Insurance Company	(51,000,000)	4,434,512							(46,565,488)	
90581	91-1079693	Symetra National Life Insurance Company	(1,000,000)								(1,000,000)	
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
<b>AUGUST FILING</b>	
11. Will Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile by August 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>	
12. Will Schedule SIS (Stockholder Information Supplement) be filed with the state of domicile by March 1? .....	NO
13. Will the Medicare Supplement Insurance Experience Exhibit be filed with the state of domicile and the NAIC by March 1? .....	NO
14. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC by March 1? .....	NO
15. Will the actuarial opinion on participating and non-participating policies as required in Interrogatories 1 and 2 to Exhibit 5 be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
16. Will the actuarial opinion on non-guaranteed elements as required in interrogatory #3 to Exhibit 5 be filed with the state of domicile and electronically with the NAIC by March 1? .....	YES
17. Will the actuarial opinion on X-Factors be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
18. Will the actuarial opinion on Separate Accounts Funding Guaranteed Minimum Benefit be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
19. Will the actuarial opinion on Synthetic Guaranteed Investment Contracts be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
20. Will the Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
21. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
22. Will the Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
23. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value) be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
24. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
25. Will the C-3 RBC Certifications required under C-3 Phase I be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO
26. Will the C-3 RBC Certifications required under C-3 Phase II be filed with the state of domicile and electronically with the NAIC by March 1? .....	NO

# SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

- 27. 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
- 28. Will the actuarial opinion required by the Modified Guaranteed Annuity Model Regulation be filed with the state of domicile and electronically with the NAIC by March 1? ..... NO
- 29. Will the Actuarial Certifications Related to Hedging required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the NAIC by March 1? ..... NO
- 30. Will the Financial Officer Certification Related to Clearly Defined Hedging Strategy required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the NAIC by March 1? ..... NO
- 31. Will the Management Certification That the Valuation Reflects Management's Intent required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the NAIC by March 1? ..... NO
- 32. Will the Actuarial Certification Related to the Reserves required by Actuarial Guideline XLIII be filed with the state of domicile and electronically with the NAIC by March 1? ..... NO
- 33. Will the Actuarial Certification regarding the use of 2001 Preferred Class Tables required by the Model Regulation Permitting the Recognition of Preferred Mortality Tables for Use in Determining Minimum Reserve Liabilities be filed with the state of domicile and electronically with the NAIC by March 1? ..... NO
- 34. Will the Worker's Compensation Carve-Out Supplement be filed by March 1? ..... NO
- 35. Will Supplemental Schedule O be filed with the state of domicile and the NAIC by March 1? ..... NO
- 36. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC by March 1? ..... NO
- 37. Will an approval from the reporting entity's state of domicile for relief related to the five-year rotation requirement for lead audit partner be filed electronically with the NAIC by March 1? ..... NO
- 38. Will an approval from the reporting entity's state of domicile for relief related to the one-year cooling off period for independent CPA be filed electronically with the NAIC by March 1? ..... NO
- 39. Will an approval from the reporting entity's state of domicile for relief related to the Requirements for Audit Committees be filed electronically with the NAIC by March 1? ..... NO

**APRIL FILING**

- 40. Will the Long-Term Care Experience Reporting Forms be filed with the state of domicile and the NAIC by April 1? ..... NO
- 41. Will the Interest-Sensitive Life Insurance Products Report Forms be filed with the state of domicile and the NAIC by April 1? ..... YES
- 42. Will the Credit Insurance Experience Exhibit be filed with the state of domicile and the NAIC by April 1? ..... NO
- 43. Will the Accident and Health Policy Experience Exhibit be filed by April 1? ..... NO
- 44. Will the Analysis of Annuity Operations by Lines of Business be filed with the state of domicile and the NAIC by April 1? ..... NO
- 45. Will the Analysis of Increase in Annuity Reserves During the Year be filed with the state of domicile and the NAIC by April 1? ..... NO
- 46. Will the Supplemental Health Care Exhibit (Parts 1, 2 and 3) be filed with the state of domicile and the NAIC by April 1? ..... NO
- 47. Will the regulator only (non-public) Supplemental Health Care Exhibit's Expense Allocation Report be filed with the state of domicile and the NAIC by April 1? ..... NO

**AUGUST FILING**

- 48. Will Management's Report of Internal Control Over Financial Reporting be filed with the state of domicile by August 1? ..... NO

Explanations:

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Bar Codes:

- 12. SIS Stockholder Information Supplement [Document Identifier 420]



- 13. Medicare Supplement Insurance Experience Exhibit [Document Identifier 360]



- 14. Trusteed Surplus Statement [Document Identifier 490]



- 15. Participating Opinion for Exhibit 5 [Document Identifier 371]



- 17. Actuarial Opinion on X-Factors [Document Identifier 442]



- 18. Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit [Document Identifier 443]



- 19. Actuarial Opinion on Synthetic Guaranteed Investment Contracts [Document Identifier 444]



- 20. Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 445]



- 21. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 446]



























- 22. Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI [Document Identifier 447]



- 23. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI [Document Identifier 448]



ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company

24. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) [Document Identifier 449]	 9 0 5 8 1 2 0 1 1 4 4 9 0 0 0 0 0 0
25. C-3 RBC Certifications Required Under C-3 Phase I [Document Identifier 450]	 9 0 5 8 1 2 0 1 1 4 5 0 0 0 0 0 0 0
26. C-3 RBC Certifications Required Under C-3 Phase II [Document Identifier 451]	 9 0 5 8 1 2 0 1 1 4 5 1 0 0 0 0 0 0
27. Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities [Document Identifier 452]	 9 0 5 8 1 2 0 1 1 4 5 2 0 0 0 0 0 0
28. Modified Guaranteed Annuity Model Regulation [Document Identifier 453]	 9 0 5 8 1 2 0 1 1 4 5 3 0 0 0 0 0 0
29. Actuarial Certifications Related to Hedging required by Actuarial Guideline XLIII [Document Identifier 436]	 9 0 5 8 1 2 0 1 1 4 3 6 0 0 0 0 0 0
30. Financial Officer Certification Related to Clearly Defined Hedging Strategy required by Actuarial Guideline XLIII [Document Identifier 437]	 9 0 5 8 1 2 0 1 1 4 3 7 0 0 0 0 0 0
31. Management Certification That the Valuation Reflects Management's Intent required by Actuarial Guideline XLIII [Document Identifier 438]	 9 0 5 8 1 2 0 1 1 4 3 8 0 0 0 0 0 0
32. Actuarial Certification Related to the Reserves required by Actuarial Guideline XLIII [Document Identifier 439]	 9 0 5 8 1 2 0 1 1 4 3 9 0 0 0 0 0 0
33. Actuarial Certification regarding the use of 2001 Preferred Class Tables required by the Model Regulation Permitting the Recognition of Preferred Mortality Tables for Use in Determining Minimum Reserve Liabilities [Document Identifier 454]	 9 0 5 8 1 2 0 1 1 4 5 4 0 0 0 0 0 0
34. Workers' Compensation Carve-Out Supplement [Document Identifier 495]	 9 0 5 8 1 2 0 1 1 4 6 5 0 0 0 0 0 0
35. Supplemental Schedule O [Document Identifier 465]	 9 0 5 8 1 2 0 1 1 4 6 5 0 0 0 0 0 0
36. Medicare Part D Coverage Supplement [Document Identifier 365]	 9 0 5 8 1 2 0 1 1 3 6 5 0 0 0 0 0 0
37. Relief from the five-year rotation requirement for lead audit partner [Document Identifier 224]	 9 0 5 8 1 2 0 1 1 2 2 4 0 0 0 0 0 0
38. Relief from the one-year cooling off period for independent CPA [Document Identifier 225]	 9 0 5 8 1 2 0 1 1 2 2 5 0 0 0 0 0 0
39. Relief from the Requirements for Audit Committees [Document Identifier 226]	 9 0 5 8 1 2 0 1 1 2 2 6 0 0 0 0 0 0
40. Long-Term Care Experience Reporting Forms [Document Identifier 306]	 9 0 5 8 1 2 0 1 1 3 0 6 0 0 0 0 0 0
42. Credit Insurance Experience Exhibit [Document Identifier 230]	 9 0 5 8 1 2 0 1 1 2 3 0 0 0 0 0 0 0
43. Accident and Health Policy Experience Exhibit [Document Identifier 210]	 9 0 5 8 1 2 0 1 1 2 1 0 0 0 0 0 0 0
44. Analysis of Annuity Operations by Lines of Business [Document Identifier 510]	 9 0 5 8 1 2 0 1 1 5 1 0 0 0 0 0 0 0
45. Analysis of Increase in Annuity Reserves During the Year [Document Identifier 515]	 9 0 5 8 1 2 0 1 1 5 1 5 0 0 0 0 0 0
46. Supplemental Health Care Exhibit (Parts 1, 2 and 3) [Document Identifier 216]	 9 0 5 8 1 2 0 1 1 2 1 6 0 0 0 0 0 0
47. Supplemental Health Care Exhibit's Expense Allocation Report [Document Identifier 217]	 9 0 5 8 1 2 0 1 1 2 1 7 0 0 0 0 0 0
48. Management's Report of Internal Control Over Financial Reporting [Document Identifier 223]	 9 0 5 8 1 2 0 1 1 2 2 3 0 0 0 0 0 0



**OVERFLOW PAGE FOR WRITE-INS**

**NONE**

**SUMMARY INVESTMENT SCHEDULE**

Investment Categories	Gross Investment Holdings		Admitted Assets as Reported in the Annual Statement			
	1 Amount	2 Percentage	3 Amount	4 Securities Lending Reinvested Collateral Amount	5 Total (Col. 3 + 4) Amount	6 Percentage
1. Bonds:						
1.1 U.S. treasury securities .....	3,297,137	20.431	3,297,137		3,297,137	20.431
1.2 U.S. government agency obligations (excluding mortgage-backed securities):						
1.21 Issued by U.S. government agencies .....		0.000				0.000
1.22 Issued by U.S. government sponsored agencies .....		0.000				0.000
1.3 Non-U.S. government (including Canada, excluding mortgaged-backed securities) .....		0.000				0.000
1.4 Securities issued by states, territories, and possessions and political subdivisions in the U.S. :						
1.41 States, territories and possessions general obligations .....		0.000				0.000
1.42 Political subdivisions of states, territories and possessions and political subdivisions general obligations .....		0.000				0.000
1.43 Revenue and assessment obligations .....		0.000				0.000
1.44 Industrial development and similar obligations .....		0.000				0.000
1.5 Mortgage-backed securities (includes residential and commercial MBS):						
1.51 Pass-through securities:						
1.511 Issued or guaranteed by GNMA .....	1,149,142	7.121	1,149,142		1,149,142	7.121
1.512 Issued or guaranteed by FNMA and FHLMC .....	319,845	1.982	319,845		319,845	1.982
1.513 All other .....		0.000				0.000
1.52 CMOs and REMICs:						
1.521 Issued or guaranteed by GNMA, FNMA, FHLMC or VA .....	7,560,164	46.848	7,560,164		7,560,164	46.848
1.522 Issued by non-U.S. Government issuers and collateralized by mortgage-backed securities issued or guaranteed by agencies shown in Line 1.521 .....		0.000				0.000
1.523 All other .....	105,504	0.654	105,504		105,504	0.654
2. Other debt and other fixed income securities (excluding short-term):						
2.1 Unaffiliated domestic securities (includes credit tenant loans and hybrid securities) .....	2,634,153	16.323	2,634,153		2,634,153	16.323
2.2 Unaffiliated non-U.S. securities (including Canada) .....		0.000				0.000
2.3 Affiliated securities .....		0.000				0.000
3. Equity interests:						
3.1 Investments in mutual funds .....		0.000				0.000
3.2 Preferred stocks:						
3.21 Affiliated .....		0.000				0.000
3.22 Unaffiliated .....		0.000				0.000
3.3 Publicly traded equity securities (excluding preferred stocks):						
3.31 Affiliated .....		0.000				0.000
3.32 Unaffiliated .....		0.000				0.000
3.4 Other equity securities:						
3.41 Affiliated .....		0.000				0.000
3.42 Unaffiliated .....		0.000				0.000
3.5 Other equity interests including tangible personal property under lease:						
3.51 Affiliated .....		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 .....		0.000				0.000
4.6 Mezzanine real estate loans .....		0.000				0.000
5. Real estate investments:						
5.1 Property occupied by company .....		0.000				0.000
5.2 Property held for production of income (including \$ ..... of property acquired in satisfaction of debt) .....		0.000				0.000
5.3 Property held for sale (including \$ ..... property acquired in satisfaction of debt) .....		0.000				0.000
6. Contract loans .....	165,086	1.023	165,086		165,086	1.023
7. Derivatives .....		0.000				0.000
8. Receivables for securities .....	534,265	3.311	534,265		534,265	3.311
9. Securities Lending (Line 10, Asset Page reinvested collateral) .....		0.000		XXX	XXX	XXX
10. Cash, cash equivalents and short-term investments .....	372,268	2.307	372,268		372,268	2.307
11. Other invested assets .....		0.000				0.000
12. Total invested assets	16,137,563	100.000	16,137,563		16,137,563	100.000

Schedule A - Verification - Real Estate

**N O N E**

Schedule B - Verification - Mortgage Loans

**N O N E**

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company  
**SCHEDULE BA - VERIFICATION BETWEEN YEARS**  
 Other Long-Term Invested Assets

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

NONE

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

1.	Book/adjusted carrying value, December 31 of prior year .....	16,425,572
2.	Cost of bonds and stocks acquired, Part 3, Column 7 .....	2,995,548
3.	Accrual of discount .....	23,127
4.	Unrealized valuation increase (decrease):	
	4.1. Part 1, Column 12 .....	
	4.2. Part 2, Section 1, Column 15 .....	
	4.3. Part 2, Section 2, Column 13 .....	
	4.4. Part 4, Column 11 .....	
5.	Total gain (loss) on disposals, Part 4, Column 19 .....	1,006
6.	Deduction consideration for bonds and stocks disposed of, Part 4, Column 7 .....	4,335,928
7.	Deduct amortization of premium .....	43,382
8.	Total foreign exchange change in book/adjusted carrying value:	
	8.1. Part 1, Column 15 .....	
	8.2. Part 2, Section 1, Column 19 .....	
	8.3. Part 2, Section 2, Column 16 .....	
	8.4. Part 4, Column 15 .....	
9.	Deduct current year's other than temporary impairment recognized:	
	9.1. Part 1, Column 14 .....	
	9.2. Part 2, Section 1, Column 17 .....	
	9.3. Part 2, Section 2, Column 14 .....	
	9.4. Part 4, Column 13 .....	
10.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) .....	15,065,943
11.	Deduct total nonadmitted amounts .....	
12.	Statement value at end of current period (Line 10 minus Line 11) .....	15,065,943

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 .....	4,446,279	4,680,992	4,427,965	4,400,985
	2. Canada .....				
	3. Other Countries .....				
	4. Totals	4,446,279	4,680,992	4,427,965	4,400,985
U.S. States, Territories and Possessions (Direct and guaranteed)	5. Totals				
U.S. Political Subdivisions of States, Territories and Possessions (Direct and guaranteed)	6. Totals				
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	7,880,008	8,396,147	7,904,478	7,799,915
Industrial and Miscellaneous and Hybrid Securities (unaffiliated)	8. United States .....	2,739,656	3,069,395	2,764,610	2,670,138
	9. Canada .....				
	10. Other Countries .....				
	11. Totals	2,739,656	3,069,395	2,764,610	2,670,138
Parent, Subsidiaries and Affiliates	12. Totals				
	13. Total Bonds	15,065,943	16,146,534	15,097,053	14,871,038
<b>PREFERRED STOCKS</b>					
Industrial and Miscellaneous (unaffiliated)	14. United States .....				
	15. Canada .....				
	16. Other Countries .....				
	17. Totals				
Parent, Subsidiaries and Affiliates	18. Totals				
	19. Total Preferred Stocks				
<b>COMMON STOCKS</b>					
Industrial and Miscellaneous (unaffiliated)	20. United States .....				
	21. Canada .....				
	22. Other Countries .....				
	23. Totals				
Parent, Subsidiaries and Affiliates	24. Totals				
	25. Total Common Stocks				
	26. Total Stocks				
	27. Total Bonds and Stocks	15,065,943	16,146,534	15,097,053	

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 9.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed (a)
<b>1. U.S. Governments</b>											
1.1 Class 1	1,389,422	2,593,636	280,719	160,942	21,560	4,446,279	29.5	7,460,458	44.8	4,446,279	
1.2 Class 2											
1.3 Class 3											
1.4 Class 4											
1.5 Class 5											
1.6 Class 6											
1.7 Totals	1,389,422	2,593,636	280,719	160,942	21,560	4,446,279	29.5	7,460,458	44.8	4,446,279	
<b>2. All Other Governments</b>											
2.1 Class 1								498,846	3.0		
2.2 Class 2											
2.3 Class 3											
2.4 Class 4											
2.5 Class 5											
2.6 Class 6											
2.7 Totals								498,846	3.0		
<b>3. U.S. States, Territories and Possessions etc., Guaranteed</b>											
3.1 Class 1											
3.2 Class 2											
3.3 Class 3											
3.4 Class 4											
3.5 Class 5											
3.6 Class 6											
3.7 Totals											
<b>4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed</b>											
4.1 Class 1											
4.2 Class 2											
4.3 Class 3											
4.4 Class 4											
4.5 Class 5											
4.6 Class 6											
4.7 Totals											
<b>5. U.S. Special Revenue &amp; Special Assessment Obligations, etc., Non-Guaranteed</b>											
5.1 Class 1	203,830	2,179,200	5,101,137	395,802	39	7,880,008	52.2	5,101,824	30.6	7,880,008	
5.2 Class 2											
5.3 Class 3											
5.4 Class 4											
5.5 Class 5											
5.6 Class 6											
5.7 Totals	203,830	2,179,200	5,101,137	395,802	39	7,880,008	52.2	5,101,824	30.6	7,880,008	

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 9.7	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 .....	16,532	1,497,092		756,416		2,270,040	15.1	2,237,533	13.4	2,270,040	
6.2 Class 2 .....	63,455	42,049		380,644		486,148	3.2	853,743	5.1	486,148	
6.3 Class 3 .....								499,965	3.0		
6.4 Class 4 .....											
6.5 Class 5 .....											
6.6 Class 6 .....											
6.7 Totals	79,987	1,539,141		1,137,060		2,756,188	18.3	3,591,241	21.6	2,756,188	
<b>7. Hybrid Securities</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. Parent, Subsidiaries and Affiliates</b>											
8.1 Class 1 .....											
8.2 Class 2 .....											
8.3 Class 3 .....											
8.4 Class 4 .....											
8.5 Class 5 .....											
8.6 Class 6 .....											
8.7 Totals											

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 9.7	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed (a)
<b>9. Total Bonds Current Year</b>											
9.1 Class 1	(d) 1,609,784	6,269,928	5,381,856	1,313,160	21,599	14,596,327	96.8	XXX	XXX	14,596,327	
9.2 Class 2	(d) 63,455	42,049		380,644		486,148	3.2	XXX	XXX	486,148	
9.3 Class 3	(d)							XXX	XXX		
9.4 Class 4	(d)							XXX	XXX		
9.5 Class 5	(d)							XXX	XXX		
9.6 Class 6	(d)							XXX	XXX		
9.7 Totals	1,673,239	6,311,977	5,381,856	1,693,804	21,599	15,082,475	100.0	XXX	XXX	15,082,475	
9.8 Line 9.7 as a % of Col. 6	11.1	41.8	35.7	11.2	0.1	100.0	XXX	XXX	XXX	100.0	
<b>10. Total Bonds Prior Year</b>											
10.1 Class 1	4,113,734	7,738,960	2,527,375	891,229	27,363	XXX	XXX	15,298,661	91.9	15,298,661	
10.2 Class 2	92,834	91,451	246,750	422,708		XXX	XXX	853,743	5.1	853,743	
10.3 Class 3	499,965					XXX	XXX	499,965	3.0	499,965	
10.4 Class 4						XXX	XXX				
10.5 Class 5						XXX	XXX		(c)		
10.6 Class 6						XXX	XXX		(c)		
10.7 Totals	4,706,533	7,830,411	2,774,125	1,313,937	27,363	XXX	XXX	16,652,369	100.0	16,652,369	
10.8 Line 10.7 as a % of Col. 8	28.3	47.0	16.7	7.9	0.2	XXX	XXX	100.0	XXX	100.0	
<b>11. Total Publicly Traded Bonds</b>											
11.1 Class 1	1,609,784	6,269,928	5,381,856	1,313,160	21,599	14,596,327	96.8	15,298,661	91.9	14,596,327	XXX
11.2 Class 2	63,455	42,049		380,644		486,148	3.2	853,743	5.1	486,148	XXX
11.3 Class 3								499,965	3.0		XXX
11.4 Class 4											XXX
11.5 Class 5											XXX
11.6 Class 6											XXX
11.7 Totals	1,673,239	6,311,977	5,381,856	1,693,804	21,599	15,082,475	100.0	16,652,369	100.0	15,082,475	XXX
11.8 Line 11.7 as a % of Col. 6	11.1	41.8	35.7	11.2	0.1	100.0	XXX	XXX	XXX	100.0	XXX
11.9 Line 11.7 as a % of Line 9.7, Col. 6, Section 9	11.1	41.8	35.7	11.2	0.1	100.0	XXX	XXX	XXX	100.0	XXX
<b>12. Total Privately Placed Bonds</b>											
12.1 Class 1										XXX	
12.2 Class 2										XXX	
12.3 Class 3										XXX	
12.4 Class 4										XXX	
12.5 Class 5										XXX	
12.6 Class 6										XXX	
12.7 Totals										XXX	
12.8 Line 12.7 as a % of Col. 6								XXX	XXX	XXX	
12.9 Line 12.7 as a % of Line 9.7, Col. 6, Section 9								XXX	XXX	XXX	

(a) Includes \$ ..... freely tradable under SEC Rule 144 or qualified for resale under SEC Rule 144A.

(b) Includes \$ ..... current year, \$ ..... prior year of bonds with Z designations and \$ ..... , current year \$ .....184,285 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 \$ ..... current year, \$ ..... prior year of bonds with 5\* designations and \$ ..... , 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 \$ ..... ; NAIC 2 \$ ..... ; NAIC 3 \$ ..... ; NAIC 4 \$ ..... ; NAIC 5 \$ ..... ; NAIC 6 \$ .....



ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 9.5	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 .....	1,199,035	2,098,102				3,297,137	21.9	6,028,543	36.2	3,297,137	
1.2 Residential Mortgage-Backed Securities .....	190,387	495,534	280,719	160,942	21,560	1,149,142	7.6	1,431,915	8.6	1,149,142	
1.3 Commercial Mortgage-Backed Securities .....											
1.4 Other Loan-Backed and Structured Securities .....											
1.5 Totals	1,389,422	2,593,636	280,719	160,942	21,560	4,446,279	29.5	7,460,458	44.8	4,446,279	
<b>2. All Other Governments</b>											
2.1 Issuer Obligations .....								498,846	3.0		
2.2 Residential Mortgage-Backed Securities .....											
2.3 Commercial Mortgage-Backed Securities .....											
2.4 Other Loan-Backed and Structured Securities .....											
2.5 Totals								498,846	3.0		
<b>3. U.S. States, Territories and Possessions, Guaranteed</b>											
3.1 Issuer Obligations .....											
3.2 Residential Mortgage-Backed Securities .....											
3.3 Commercial Mortgage-Backed Securities .....											
3.4 Other Loan-Backed and Structured Securities .....											
3.5 Totals											
<b>4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed</b>											
4.1 Issuer Obligations .....											
4.2 Residential Mortgage-Backed Securities .....											
4.3 Commercial Mortgage-Backed Securities .....											
4.4 Other Loan-Backed and Structured Securities .....											
4.5 Totals											
<b>5. U.S. Special Revenue &amp; Special Assessment Obligations etc., Non-Guaranteed</b>											
5.1 Issuer Obligations .....											
5.2 Residential Mortgage-Backed Securities .....	203,830	1,556,576	3,635,475	395,802	39	5,791,722	38.4	5,101,824	30.6	5,791,722	
5.3 Commercial Mortgage-Backed Securities .....		622,624	1,465,662			2,088,286	13.8			2,088,286	
5.4 Other Loan-Backed and Structured Securities .....											
5.5 Totals	203,830	2,179,200	5,101,137	395,802	39	7,880,008	52.2	5,101,824	30.6	7,880,008	
<b>6. Industrial and Miscellaneous</b>											
6.1 Issuer Obligations .....	16,532	1,497,092		1,137,060		2,650,684	17.6	3,406,957	20.5	2,650,684	
6.2 Residential Mortgage-Backed Securities .....	63,455	42,049				105,504	0.7	184,284	1.1	105,504	
6.3 Commercial Mortgage-Backed Securities .....											
6.4 Other Loan-Backed and Structured Securities .....											
6.5 Totals	79,987	1,539,141		1,137,060		2,756,188	18.3	3,591,241	21.6	2,756,188	
<b>7. Hybrid Securities</b>											
7.1 Issuer Obligations .....											
7.2 Residential Mortgage-Backed Securities .....											
7.3 Commercial Mortgage-Backed Securities .....											
7.4 Other Loan-Backed and Structured Securities .....											
7.5 Totals											
<b>8. Parent, Subsidiaries and Affiliates</b>											
8.1 Issuer Obligations .....											
8.2 Residential Mortgage-Backed Securities .....											
8.3 Commercial Mortgage-Backed Securities .....											
8.4 Other Loan-Backed and Structured Securities .....											
8.5 Totals											

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 9.5	8 Total from Col. 6 Prior Year	9 % From Col. 7 Prior Year	10 Total Publicly Traded	11 Total Privately Placed
<b>9. Total Bonds Current Year</b>											
9.1 Issuer Obligations .....	1,215,567	3,595,194	3,916,194	1,137,060		5,947,821	39.4	XXX	XXX	5,947,821	
9.2 Residential Mortgage-Backed Securities .....	457,672	2,094,159	1,465,662	556,744	21,599	7,046,368	46.7	XXX	XXX	7,046,368	
9.3 Commercial Mortgage-Backed Securities .....		622,624	1,465,662			2,088,286	13.8	XXX	XXX	2,088,286	
9.4 Other Loan-Backed and Structured Securities .....								XXX	XXX		
9.5 Totals .....	1,673,239	6,311,977	5,381,856	1,693,804	21,599	15,082,475	100.0	XXX	XXX	15,082,475	
9.6 Line 9.5 as a % of Col. 6 .....	11.1	41.8	35.7	11.2	0.1	100.0	XXX	XXX	XXX	100.0	
<b>10. Total Bonds Prior Year</b>											
10.1 Issuer Obligations .....	3,961,071	4,543,807	246,750	1,182,718		XXX	XXX	9,934,346	59.7	9,934,346	
10.2 Residential Mortgage-Backed Securities .....	745,462	3,286,603	2,527,376	131,219	27,363	XXX	XXX	6,718,023	40.3	6,718,023	
10.3 Commercial Mortgage-Backed Securities .....						XXX	XXX				
10.4 Other Loan-Backed and Structured Securities .....						XXX	XXX				
10.5 Totals .....	4,706,533	7,830,410	2,774,126	1,313,937	27,363	XXX	XXX	16,652,369	100.0	16,652,369	
10.6 Line 10.5 as a % of Col. 8 .....	28.3	47.0	16.7	7.9	0.2	XXX	XXX	100.0	XXX	100.0	
<b>11. Total Publicly Traded Bonds</b>											
11.1 Issuer Obligations .....	1,215,567	3,595,194	3,916,194	1,137,060		5,947,821	39.4	9,934,346	59.7	5,947,821	XXX
11.2 Residential Mortgage-Backed Securities .....	457,672	2,094,159	1,465,662	556,744	21,599	7,046,368	46.7	6,718,023	40.3	7,046,368	XXX
11.3 Commercial Mortgage-Backed Securities .....		622,624	1,465,662			2,088,286	13.8			2,088,286	XXX
11.4 Other Loan-Backed and Structured Securities .....											XXX
11.5 Totals .....	1,673,239	6,311,977	5,381,856	1,693,804	21,599	15,082,475	100.0	16,652,369	100.0	15,082,475	XXX
11.6 Line 11.5 as a % of Col. 6 .....	11.1	41.8	35.7	11.2	0.1	100.0	XXX	XXX	XXX	100.0	XXX
11.7 Line 11.5 as a % of Line 9.5, Col. 6, Section 9 .....	11.1	41.8	35.7	11.2	0.1	100.0	XXX	XXX	XXX	100.0	XXX
<b>12. Total Privately Placed Bonds</b>											
12.1 Issuer Obligations .....										XXX	
12.2 Residential Mortgage-Backed Securities .....										XXX	
12.3 Commercial Mortgage-Backed Securities .....										XXX	
12.4 Other Loan-Backed and Structured Securities .....										XXX	
12.5 Totals .....										XXX	
12.6 Line 12.5 as a % of Col. 6 .....							XXX	XXX	XXX	XXX	
12.7 Line 12.5 as a % of Line 9.5, Col. 6, Section 9 .....							XXX	XXX	XXX	XXX	

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 .....	226,797	226,797			
2. Cost of short-term investments acquired .....	7,054,680	7,054,680			
3. Accrual of discount .....					
4. Unrealized valuation increase (decrease) .....					
5. Total gain (loss) on disposals .....					
6. Deduct consideration received on disposals .....	7,264,945	7,264,945			
7. Deduct amortization of premium .....					
8. Total foreign exchange change in book/adjusted carrying value .....					
9. Deduct current year's other than temporary impairment recognized .....					
10. Book adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) .....	16,532	16,532			
11. Deduct total nonadmitted amounts .....					
12. Statement value at end of current period (Line 10 minus Line 11)	16,532	16,532			

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

Schedule DB - Part A - Verification - Options, Caps, Floors, Collars, Swaps and Forwards

**N O N E**

Schedule DB - Part B - Verification - Futures Contracts

**N O N E**

Schedule DB - Part C - Section 1 - Replication (Synthetic Asset) Transactions (RSATs) Open

**N O N E**

Schedule DB-Part C-Section 2-Reconciliation of Replication (Synthetic Asset) Transactions Open

**N O N E**

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

**N O N E**

**SCHEDULE E - VERIFICATION BETWEEN YEARS**

(Cash Equivalents)

	1	2	3
	Total	Bonds	Other (a)
1. Book/adjusted carrying value, December 31 of prior year .....			
2. Cost of cash equivalents acquired .....	1,199,775	1,199,775	
3. Accrual of discount .....	225	225	
4. Unrealized valuation increase (decrease) .....			
5. Total gain (loss) on disposals .....			
6. Deduct consideration received on disposals .....	1,200,000	1,200,000	
7. Deduct amortization of premium .....			
8. Total foreign exchange change in book/adjusted carrying value .....			
9. Deduct current year's other than temporary impairment recognized .....			
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) .....			
11. Deduct total nonadmitted amounts .....			
12. Statement value at end of current period (Line 10 minus Line 11)			

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

Schedule A - Part 1 - Real Estate Owned

**N O N E**

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

**N O N E**

Schedule A - Part 3 - Real Estate Disposed

**N O N E**

Schedule B - Part 1 - Mortgage Loans Owned

**N O N E**

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

**N O N E**

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

**N O N E**

Schedule BA - Part 1 - Other Long-Term Invested Assets Owned

**N O N E**

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

**N O N E**

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

**N O N E**

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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
912828-BH-2	US TREASURY N/B NOTES	.SD			1	1,338,852		1,064,610	1,350,000	1,347,739		1,318			4.250	4.358	FA	21,672	57,375	04/30/2004	08/15/2013
912828-CJ-7	US TREASURY N/B NOTES	.SD			1	153,264		110,4530	150,000	150,921		(360)			4.750	4.474	MN	920	7,125	07/06/2004	05/15/2014
912828-GQ-7	US TREASURY N/B	.SD			1	888,961		1,014,410	900,000	899,185		2,405			4.500	4.781	AO	6,898	40,500	05/24/2007	04/30/2012
912828-GI-4	US TREASURY N/B	.SD			1	298,652		102,3590	300,000	299,851		290			4.875	4.978	JD	40	14,625	06/28/2007	06/30/2012
912828-HY-9	US TREASURY N/B US TREASURY N/B	.SD			1	598,031		103,8560	600,000	599,441		405			3.125	3.197	AO	3,194	18,750	05/27/2008	04/30/2013
0199999	Subtotal - Bonds - U.S. Governments - Issuer Obligations					3,277,760	XXX	3,446,086	3,300,000	3,297,137		4,058			XXX	XXX	XXX	32,724	138,375	XXX	XXX
3620AA-TX-6	GNMA POOL #724266		2		1	684,745		112,3280	734,173	653,597		(214)			5.500	4.493	MON	2,996	35,948	09/23/2009	09/15/2039
3620AC-6M-1	GNM 2009-20 A POOL #726376		2		1	307,768		110,8780	294,382	307,507		(54)			5.000	3.963	MON	1,227	14,719	11/20/2009	10/15/2039
36295N-NM-5	GNMA POOL #675496		2		1	157,692		113,9340	153,006	157,557		(7)			6.500	5.524	MON	829	9,945	08/08/2008	06/15/2038
0299999	Subtotal - Bonds - U.S. Governments - Residential Mortgage-Backed Securities					1,150,205	XXX	1,234,906	1,100,985	1,149,142		(275)			XXX	XXX	XXX	5,052	60,612	XXX	XXX
0599999	Total - U.S. Government Bonds					4,427,965	XXX	4,680,992	4,400,985	4,446,279		3,783			XXX	XXX	XXX	37,776	198,987	XXX	XXX
1099999	Total - All Other Government Bonds						XXX								XXX	XXX	XXX			XXX	XXX
1799999	Total - U.S. States, Territories and Possessions Bonds						XXX								XXX	XXX	XXX			XXX	XXX
2499999	Total - U.S. Political Subdivisions Bonds						XXX								XXX	XXX	XXX			XXX	XXX
31297A-5B-6	FHLMC POOL #A23542		2		1	142,141		106,3060	154,214	142,658		66			4.500	7.827	MON	578	6,940	06/10/2004	06/01/2034
31394Y-KH-6	FHLMC REHIC SERIES 2791 CLASS QB (SEQ-NAS)		2		1	142,027		104,1200	146,043	144,636		667			4.500	5.631	MON	548	6,572	06/10/2004	01/15/2014
31397S-2Z-6	FANVIE MAE SERIES 2011-45 CLASS TY		2		1	904,648		1,015,298	1,000,000	908,424		3,775			3.000	4.139	MON	2,500	15,000	06/21/2011	01/25/2026
31401W-TE-9	FNMA POOL #720649		2		1	176,198		105,7210	199,658	177,187		(2,499)			4.000	10.149	MON	666	7,986	06/10/2004	05/01/2033
38374Y-CZ-4	GNMA SERIES 2010-93 CLASS GP		2		1	1,493,164		1,115,500	1,390,000	1,478,226		(11,881)			4.500	3.422	MON	5,213	62,550	09/28/2010	01/20/2020
38377E-K3-7	GNMA SERIES 2010-60 CLASS QG		2		1	2,284,800		1,110,1510	2,240,000	2,273,721		(5,203)			4.500	4.142	MON	8,400	100,800	05/19/2010	09/20/2018
38377K-AD-2	GNMA SERIES 2010-114 CLASS NB		2		1	670,600		111,8040	640,000	666,870		(3,328)			4.500	3.829	MON	2,400	28,800	11/15/2010	05/20/2020
2699999	Subtotal - Bonds - U.S. Special Revenues - Residential Mortgage-Backed Securities					5,813,578	XXX	6,275,853	5,769,915	5,791,722		(18,403)			XXX	XXX	XXX	20,305	228,648	XXX	XXX
38376G-4H-0	GOVERNMENT NATIONAL MO SERIES 2011-126 CLASS AE		2		1	2,090,900		104,4480	2,030,000	2,088,286		(2,614)			3.131	2.557	MON	5,297	15,892	09/07/2011	08/16/2018
2799999	Subtotal - Bonds - U.S. Special Revenues - Commercial Mortgage-Backed Securities					2,090,900	XXX	2,120,294	2,030,000	2,088,286		(2,614)			XXX	XXX	XXX	5,297	15,892	XXX	XXX
3199999	Total - U.S. Special Revenues Bonds					7,904,478	XXX	8,396,147	7,799,915	7,880,008		(21,017)			XXX	XXX	XXX	25,602	244,540	XXX	XXX
035229-CV-3	ANHEUSER-BUSCH CO NTS				1FE	244,088		113,8950	284,738	247,244		493			5.050	5.314	AO	2,665	12,625	07/06/2004	10/15/2016
097023-AM-7	BOEING CO DEBS				1FE	459,950		134,7580	395,000	443,926		(2,328)			7.250	5.903	JD	1,273	28,638	07/03/2003	06/15/2025
10138M-AD-7	BOTTLING GROUP LLC UNSEC'D SR NTS SER B				1FE	226,938		109,4650	250,000	241,269		2,250			4.125	5.244	JD	458	10,313	07/06/2004	06/15/2015
494368-AS-2	KIMBERLY CLARK CORP NTS				1FE	321,384		128,6310	280,000	312,490		(1,266)			6.375	5.291	JJ	8,925	17,850	07/03/2003	01/01/2028
59018Y-SU-6	MERRILL LYNCH & CO UNSUB SR NTS SER C				1FE	517,745		99,4860	500,000	504,455		(1,989)			5.000	4.548	FA	10,278	25,000	03/24/2004	02/03/2014
74955D-AB-7	AEP GENERATING CO		2		2FE	376,573		121,2230	389,517	380,644		428			9.820	10.170	JD	2,550	38,251	09/05/1990	12/07/2022
90333W-AC-2	US BANK NA SUB NTS				1FE	511,750		109,1850	500,000	504,124		(1,138)			4.800	4.527	AO	5,067	24,000	03/25/2004	04/15/2015
3299999	Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated) - Issuer Obligations					2,658,428	XXX	2,966,397	2,564,517	2,634,152		(3,550)			XXX	XXX	XXX	31,216	156,677	XXX	XXX
55274S-AK-7	MASTER ASSET SECURITIZATION 2006-3 1A10		2		2FM	106,182		97,5170	105,621	105,504		(109)			6.000	5.723	MON	528	6,337	01/11/2007	10/25/2013
3399999	Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated) - Residential Mortgage-Backed Securities					106,182	XXX	102,998	105,621	105,504		(109)			XXX	XXX	XXX	528	6,337	XXX	XXX
3899999	Total - Industrial and Miscellaneous (Unaffiliated) Bonds					2,764,610	XXX	3,069,395	2,670,138	2,739,656		(3,659)			XXX	XXX	XXX	31,744	163,014	XXX	XXX
4899999	Total - Hybrid Securities						XXX								XXX	XXX	XXX			XXX	XXX
5599999	Total - Parent, Subsidiaries and Affiliates Bonds						XXX								XXX	XXX	XXX			XXX	XXX
7799999	Total - Issuer Obligations					5,936,188	XXX	6,412,483	5,864,517	5,931,289		508			XXX	XXX	XXX	63,940	295,052	XXX	XXX
7899999	Total - Residential Mortgage-Backed Securities					7,069,965	XXX	7,613,757	6,976,521	7,046,368		(18,787)			XXX	XXX	XXX	25,885	295,597	XXX	XXX
7999999	Total - Commercial Mortgage-Backed Securities					2,090,900	XXX	2,120,294	2,030,000	2,088,286		(2,614)			XXX	XXX	XXX	5,297	15,892	XXX	XXX
8099999	Total - Other Loan-Backed and Structured Securities						XXX								XXX	XXX	XXX			XXX	XXX
8399999	Total Bonds					15,097,053	XXX	16,146,534	14,871,038	15,065,943		(20,893)			XXX	XXX	XXX	95,122	606,541	XXX	XXX

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Schedule D - Part 2 - Section 1 - Preferred Stocks Owned

**N O N E**

Schedule D - Part 2 - Section 2 - Common Stocks Owned

**N O N E**



ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National Life Insurance Company

**SCHEDULE D - PART 3**

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

1 CUSIP Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Number of Shares of Stock	7 Actual Cost	8 Par Value	9 Paid for Accrued Interest and Dividends
313975-22-6	FANNIE MAE SERIES 2011-45 CLASS TY 3.000% 05/25/26		06/21/2011	Deutsche Bank Securities, Inc.		904,648	1,000,000	1,917
383766-4H-0	GOVERNMENT NATIONAL MO SERIES 2011-126 CLASS AE 3.131% 01/16/45		09/07/2011	JP Morgan Securities, Inc.		2,090,900	2,030,000	5,120
3199999. Subtotal - Bonds - U.S. Special Revenues						2,995,548	3,030,000	7,037
8399997. Total - Bonds - Part 3						2,995,548	3,030,000	7,037
8399998. Total - Bonds - Part 5								
8399999. Total - Bonds						2,995,548	3,030,000	7,037
8999997. Total - Preferred Stocks - Part 3							XXX	
8999998. Total - Preferred Stocks - Part 5							XXX	
8999999. Total - Preferred Stocks							XXX	
9799997. Total - Common Stocks - Part 3							XXX	
9799998. Total - Common Stocks - Part 5							XXX	
9799999. Total - Common Stocks							XXX	
9899999. Total - Preferred and Common Stocks							XXX	
9999999 - Totals						2,995,548	XXX	7,037

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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	
3620AA-TX-6	GIMA POOL #724266 5.500% 09/15/39		12/01/2011	Paydown		153,712	153,712	161,038	160,931		(7,219)		(7,219)		153,712				4,089	09/15/2039	
	GIM 2009-20 A POOL #726376 5.000%																				
3620AC-6M-1	10/15/39		12/01/2011	Paydown		72,025	72,025	75,300	75,249		(3,224)		(3,224)		72,025				1,642	10/15/2039	
36295N-NM-5	GIMA POOL #675496 6.500% 06/15/38		12/01/2011	Paydown		44,979	44,979	46,356	46,319		(1,340)		(1,340)		44,979				1,319	06/15/2038	
912828-FA-3	US TREASURY N/B 4.750% 03/31/11		03/31/2011	Maturity		235,000	235,000	234,165	234,955		45		45		235,000				5,581	03/31/2011	
912828-FS-4	US TREASURY N/B 4.625% 08/31/11		08/31/2011	Maturity		2,000,000	2,000,000	2,007,500	2,001,113		(1,113)		(1,113)		2,000,000				92,500	08/31/2011	
912828-GC-8	US TREASURY N/B 4.625% 12/31/11		12/31/2011	Maturity		500,000	500,000	497,266	499,396		604		604		500,000				23,125	12/31/2011	
<b>0599999. Subtotal - Bonds - U.S. Governments</b>						3,005,716	3,005,716	3,021,625	3,017,963		(12,247)		(12,247)		3,005,716				128,256	XXX	
458182-BM-3	INTER AMERICAN DEVELOPMENT BNK 8.500%	F	03/15/2011	Maturity		500,000	500,000	445,460	498,846		1,154		1,154		500,000				21,250	03/15/2011	
<b>1099999. Subtotal - Bonds - All Other Governments</b>						500,000	500,000	445,460	498,846		1,154		1,154		500,000				21,250	XXX	
31297A-5B-6	FHLMC POOL #A23542 4.500% 06/01/34		12/01/2011	Paydown		63,247	63,247	58,296	58,480		4,766		4,766		63,247				1,465	06/01/2034	
	FHLMC REMIC SERIES 2791 CLASS OB (SEQ-NAS)																				
31394Y-KH-6	4.500% 05/15/33		12/01/2011	Paydown		88,421	88,421	85,989	87,165		1,256		1,256		88,421				2,698	01/15/2014	
31401W-TE-9	FNMA POOL #720649 4.000% 05/01/33		12/01/2011	Paydown		56,335	56,335	49,716	50,700		5,635		5,635		56,335				1,712	05/01/2033	
<b>3199999. Subtotal - Bonds - U.S. Special Revenues</b>						208,003	208,003	194,001	196,345		11,657		11,657		208,003				5,875	XXX	
55274S-AK-7	MASTER ASSET SECURITIZATION 2006-3 1A10 6.000% 10/25/36		12/01/2011	Paydown		78,679	78,679	79,097	78,673		6		6		78,679				2,517	10/25/2013	
	Redemption																				
74955D-AB-7	AEP GENERATING CO 9.820% 12/07/22		12/07/2011	100.0000		43,530	43,530	42,084	42,491		33		33		42,524		1,006	1,006	3,283	12/07/2022	
852060-AJ-1	SPRINT CAP CORP NOTES 7.625% 01/30/11		01/30/2011	Maturity		500,000	500,000	496,785	499,965		35		35		500,000				19,063	01/30/2011	
<b>3899999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)</b>						622,209	622,209	617,966	621,129		74		74		621,203		1,006	1,006	24,863	XXX	
<b>8399997. Total - Bonds - Part 4</b>						4,335,928	4,335,928	4,279,052	4,334,283		638		638		4,334,922		1,006	1,006	180,244	XXX	
<b>8399998. Total - Bonds - Part 5</b>																					XXX
<b>8399999. Total - Bonds</b>						4,335,928	4,335,928	4,279,052	4,334,283		638		638		4,334,922		1,006	1,006	180,244	XXX	
<b>8999997. Total - Preferred Stocks - Part 4</b>								XXX													XXX
<b>8999998. Total - Preferred Stocks - Part 5</b>								XXX													XXX
<b>8999999. Total - Preferred Stocks</b>								XXX													XXX
<b>9799997. Total - Common Stocks - Part 4</b>								XXX													XXX
<b>9799998. Total - Common Stocks - Part 5</b>								XXX													XXX
<b>9799999. Total - Common Stocks</b>								XXX													XXX
<b>9899999. Total - Preferred and Common Stocks</b>								XXX													XXX
<b>9999999 - Totals</b>						4,335,928	4,335,928	4,279,052	4,334,283		638		638		4,334,922		1,006	1,006	180,244	XXX	

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Schedule D - Part 5 - Long Term Bonds and Stocks Acquired and Fully Disposed Of

**N O N E**

Schedule D-Part 6-Section 1-Valuation of Shares of Subsidiary, Controlled or Affiliated Companies

**N O N E**

Schedule D - Part 6 - Section 2

**N O N E**

ANNUAL STATEMENT FOR THE YEAR 2011 OF THE Symetra National 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 Identi- fication	Description	Code	For- eign	Date Acquired	Name of Vendor	Maturity Date	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	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
0599999. 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 Bonds																XXX	XXX	XXX		
3199999. Total - U.S. Special Revenues Bonds																XXX	XXX	XXX		
3899999. Total - Industrial and Miscellaneous (Unaffiliated) Bonds																XXX	XXX	XXX		
4899999. Total - Hybrid Securities																XXX	XXX	XXX		
5599999. Total - Parent, Subsidiaries and Affiliates Bonds																XXX	XXX	XXX		
7799999. Total - Issuer Obligations																XXX	XXX	XXX		
7899999. Total - Residential Mortgage-Backed Securities																XXX	XXX	XXX		
7999999. Total - Commercial Mortgage-Backed Securities																XXX	XXX	XXX		
8099999. Total - Other Loan-Backed and Structured Securities																XXX	XXX	XXX		
8399999. Total Bonds																XXX	XXX	XXX		
8699999. Total - Parent, Subsidiaries and Affiliates												XXX				XXX	XXX	XXX		
4812A0-36-7 JP MORGAN PRIME MKT OVERNIGHT SHEEP				12/16/2011	Direct		16,532						16,532			0.000	0.000	MON		30
8999999. Subtotal - Class One Money Market Mutual Funds							16,532					XXX	16,532			XXX	XXX	XXX		30
9199999 - Totals							16,532					XXX	16,532			XXX	XXX	XXX		30

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Schedule DB - Part A - Section 1 - Options, Caps, Floors, Collars, Swaps and Forwards Open

**N O N E**

Schedule DB - Part A - Section 2 - Options, Caps, Floors, Collars, Swaps and Forwards Terminated

**N O N E**

Schedule DB - Part B - Section 1 - Futures Contracts Open

**N O N E**

Schedule DB - Part B - Section 1B - Brokers with whom cash deposits have been made

**N O N E**

Schedule DB - Part B - Section 2 - Futures Contracts Terminated

**N O N E**

Schedule DB - Part B - Section 2B - Brokers with whom cash deposits have been made

**N O N E**

Schedule DB - Part D - Counterparty Exposure for Derivative Instruments Open

**N O N E**

Schedule DL - Part 1 - Reinvested Collateral Assets Owned

**N O N E**

Schedule DL - Part 2 - Reinvested Collateral Assets Owned

**N O N E**



**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 2011 OF THE Symetra National 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	B Qualifying			49,955	50,721	
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 Qualifying			149,860	155,783	
33. New York	NY						
34. North Carolina	NC	B Qualifying			400,695	419,283	
35. North Dakota	ND						
36. Ohio	OH						
37. Oklahoma	OK	B Qualifying			149,864	152,162	
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 Qualifying			99,907	103,856	
48. Washington	WA	B Qualifying	1,522,576	1,618,969			
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	1,522,576	1,618,969	850,281	881,805	
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					



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