

LIFE AND ACCIDENT AND HEALTH COMPANIES - ASSOCIATION EDITION

### ANNUAL STATEMENT

FOR THE YEAR ENDED DECEMBER 31, 2009

OF THE CONDITION AND AFFAIRS OF THE

## Symetra National Life Insurance Company

NAIC			ie <u>90581</u> Employer's ID	Number <u>91-1079693</u>
Organized under the Laws of	(Current) ( Washi	Prior) ngton,	State of Domicile or Port of En	try Washington
Country of Domicile		United States	of America	
Incorporated/Organized	09/04/1979		Commenced Business	09/05/1979
Statutory Home Office	_777 108th Avenue N	E, Suite 1200,		Bellevue , WA 98004
	(Street and N	umber)	(Ci	ty or Town, State and Zip Code)
Main Administrative Office		777 108th Avenue	NE, Suite 1200	
	Balleuma WA 00004	(Street and	Number)	405 050 2000
(Ci	Bellevue, WA 98004 ty or Town, State and Zip Code	'	(A	425-256-8000
<b>V</b> <sup>2</sup>	, , , , , , , , , , , , , , , , , , , ,	)		
Mail Address	P.O.Box 34690 (Street and Number or P			Seattle , WA 98124-1690
	(Suber and Number of P	.0. 60x)	(0)	iy of Town, State and Zip Code)
Primary Location of Books and	d Records	777 108th Avenu		
	Bellevue , WA 98004	(Street and	Number)	425-256-8000
(C	ity or Town, State and Zip Code	, )	(A	rea Code) (Telephone Number)
Internet Website Address		www.sym	etra com	
internet webaite Address				
Statutory Statement Contact	Kristin J	aneen Khalighi	·	425-256-8557
	kristin.khalighi@symetra.com	(Name)		(Area Code) (Telephone Number) 425-256-5818
	(E-mail Address)	,		(FAX Number)
		OFFIC	ERS	
President	Randall How	ard Talbot	Treasurer	Colleen Mary Murphy
Secretary	George Christo	pher Pagos	Chief Actuary	Tommie David Brooks
		OTH	IER	
Allyn David Close	Senior Vice President		s Senior Vice President	Colin Michael Elder Vice President
	Senior Vice President		z Vice President	Roger Floyd Harbin Executive Vice President
	ard Vice President		Holmes Vice President	Michele Marie Kemper Vice President
	dden Vice President		ffey_Vice President	Patrick Bryan McCormick Senior Vice President
	heridan Vice President	Margaret Alice Meister	Executive Vice President	James Dwyer Pirak Vice President
		DIRECTORS O		
	avid Close		ctoria Davies	Michael William Fry #
	ieris Lindsay #	Margaret A	Alice Meister	George Christopher Pagos
State of	Washington	—— SS:		

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 filling 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.

largh /alter

Kina

County of

Marg A M.

February, 2010

Randall Howard Talbot President

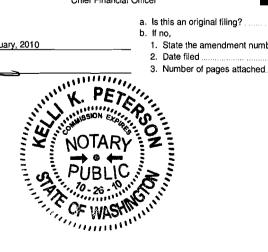
Margaret Alice Meister Chief Financial Officer

a. Is this an original filing?

b. If no,
1. State the amendment number.

Yes [X] No []

Subscribed and sworn to before me this day of /12th



	A30	SETS			
	_	1	Current Year 2	3	Prior Year 4
		Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	Net Admitted Assets
1.	Bonds (Schedule D)				
2.	Stocks (Schedule D):				10,700,004
2.	2.1 Preferred stocks	498 650			494 882
	2.2 Common stocks	,		,	101,002
3.	Mortgage loans on real estate (Schedule B):				
0.	3.1 First liens				
4.	Real estate (Schedule A):				
4.	4.1 Properties occupied by the company (less \$				
	encumbrances)				
	4.2 Properties held for the production of income (less				
	4.3 Properties held for sale (less \$				
	encumbrances)				
5.	Cash (\$				
5.	(\$, Schedule E - Part 2) and short-term				
		205 500		295 500	616 410
•	investments (\$				
6.	Contract loans (including \$ premium notes)				
7.	Other invested assets (Schedule BA)				
8.					
9.	Aggregate write-ins for invested assets				
10.	Subtotals, cash and invested assets (Lines 1 to 9)	16,480,921		16,480,921	
11.	Title plants less \$ charged off (for Title insurers				
	only)			·····	
12.	Investment income due and accrued	1/1,014			
13.	Premiums and considerations:				
	13.1 Uncollected premiums and agents' balances in the course of collection			3,831	
	13.2 Deferred premiums and agents' balances and installments booked but				
	deferred and not yet due (including \$				
	earned but unbilled premiums)				61, 161
	13.3 Accrued retrospective premiums				
14.	Reinsurance:				
	14.1 Amounts recoverable from reinsurers				
	14.2 Funds held by or deposited with reinsured companies				
	14.3 Other amounts receivable under reinsurance contracts				
15.	Amounts receivable relating to uninsured plans				
16.1	5				
16.2	Net deferred tax asset				
17.	Guaranty funds receivable or on deposit	10,437			7,913
18.	Electronic data processing equipment and software				
19.	Furniture and equipment, including health care delivery assets				
	(\$				
20.	Net adjustment in assets and liabilities due to foreign exchange rates				
21.	Receivables from parent, subsidiaries and affiliates				
22.	Health care (\$ ) and other amounts receivable				
23.	Aggregate write-ins for other than invested assets				
24.	Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 10 to 23)	17 424 520	650,406		17 264 526
05		17,434,520	050,400	10,704,114	
25.	From Separate Accounts, Segregated Accounts and Protected Cell Accounts				
26.	Total (Lines 24 and 25)	17,434,520	650,406	16,784,114	17,364,526
	DETAILS OF WRITE-INS				
0901.					
0902.					
0903.					
0998.	Summary of remaining write-ins for Line 9 from overflow page				
0999.	Totals (Lines 0901 thru 0903 plus 0998)(Line 9 above)				
2301.	Accounts and notes receivable	300			
2302.					
2303.					
2398.	Summary of remaining write-ins for Line 23 from overflow page				
	,			[ [	

## ASSETS

## LIABILITIES, SURPLUS AND OTHER FUNDS

		1 Current Year	2 Prior Year
1.	Aggregate reserve for life contracts	6 330 708	6 1/8 208
2.	Aggregate reserve for accident and health contracts (Exhibit 6, Line 17, Col. 1) (including \$	0,339,708	0, 140,290
	Modco Reserve)		
	Liability for deposit-type contracts (Exhibit 7, Line 14, Col. 1) (including \$		
4.	Contract claims: 4.1 Life (Exhibit 8, Part 1, Line 4.4, Col. 1 less sum of Cols. 9, 10 and 11)	2 000	2 000
	4.1 Ene (Exhibit 6, Part 1, Ene 4.4, Col. Tress 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 \$		
	6.3 Coupons and similar benefits (including \$ Modeo)		
	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)	2 981	3 076
9.	Contract liabilities not included elsewhere:		
	9.1 Surrender values on canceled contracts		
	9.2 Provision for experience rating refunds, including \$ accident and health experience rating		
	refunds		
	ceded		
	9.4 Interest maintenance reserve (IMR, Line 6)		
10.	Commissions to agents due or accrued-life and annuity contracts \$		
11.	and deposit-type contract funds      Commissions and expense allowances payable on reinsurance assumed		
12.	General expenses due or accrued (Exhibit 2, Line 12, Col. 6)		
	Transfers to Separate Accounts due or accrued (net) (including \$ accrued for expense		
	allowances recognized in reserves, net of reinsured allowances)		
	Taxes, licenses and fees due or accrued, excluding federal income taxes (Exhibit 3, Line 9, Col. 5)		
	Current federal and foreign income taxes including \$		
	Unearned investment income		
17.	Amounts withheld or retained by company as agent or trustee		
	Amounts held for agents' account, including \$ agents' credit balances		
	Remittances and items not allocated		
	Net adjustment in assets and liabilities due to foreign exchange rates		
	Borrowed money \$ and interest thereon \$		
23.	Dividends to stockholders declared and unpaid		
24.	Miscellaneous liabilities:		10.000
	24.1 Asset valuation reserve (AVR, Line 16, Col. 7)         24.2 Reinsurance in unauthorized companies		
	24.3 Funds held under reinsurance treaties with unauthorized reinsurers		
	24.4 Payable to parent, subsidiaries and affiliates		
	24.5 Drafts outstanding		
	24.6 Liability for amounts held under uninsured plans		
	24.7 Purios held under consurance		
	24.9 Capital notes \$ and interest thereon \$		
	Aggregate write-ins for liabilities		22
	Total Liabilities excluding Separate Accounts business (Lines 1 to 25)		6,379,325
27. 28.	From Separate Accounts Statement		6 970 995
	Common capital stock	6,540,528	6,379,325
	Preferred capital stock		
31.	Aggregate write-ins for other than special surplus funds		
	Surplus notes		
	Gross paid in and contributed surplus (Page 3, Line 33, Col. 2 plus Page 4, Line 51.1, Col. 1)		
	Aggregate write-ins for special surplus funds		
	Less treasury stock, at cost:		
	36.1 shares common (value included in Line 29 \$ )		
	36.2shares preferred (value included in Line 30 \$)		0 405 001
	Surplus (Total Lines 31+32+33+34+35-36) (including \$ in Separate Accounts Statement) Totals of Lines 29, 30 and 37 (Page 4, Line 55)	7,743,586	8,485,201 10,985,201
39.	Totals of Lines 28 and 38 (Page 2, Line 30)	16,784,114	17,364,526
	DETAILS OF WRITE-INS		· · ·
	Accrued interest on policy claims		
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)	22	22
3101. 3102.			
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. 3402.	Deferred tax asset adjustment related to SSAP #10R	,	
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)	35,126	

## SUMMARY OF OPERATIONS

	SUMMANT OF CRATIONS	1	2
		Current Year	Prior Year
1.	Premiums and annuity considerations for life and accident and health contracts (Exhibit 1, Part 1, Line 20.4, Col. 1, less Col. 11)	316 302	
2.	Considerations for supplementary contracts with life contingencies		
3.	Net investment income (Exhibit of Net Investment Income, Line 17)		
4.	Amortization of interest maintenance reserve (IMR, Line 5)		
5. 6.	Separate Accounts net gain from operations excluding unrealized gains or losses		
0. 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		
9.	Total (Lines 1 to 8.3)	1,142,323	1,207,505
	Death benefits	, ,	
11.	Matured endowments (excluding guaranteed annual pure endowments)		
12.	Annuity benefits (Exhibit 8, Part 2, Line 6.4, Cols. 4 + 8)		
13. 14.	Disability benefits and benefits under accident and health contracts Coupons, guaranteed annual pure endowments and similar benefits		8,896
	Surrender benefits and withdrawals for life contracts		
16.	Group conversions		
17.	Interest and adjustments on contract or deposit-type contract funds		
18.	Payments on supplementary contracts with life contingencies		
	Increase in aggregate reserves for life and accident and health contracts	191,410	45,546
20. 21.	Totals (Lines 10 to 19)		239, 181
	2, Line 31, Col. 1)		
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)		
24.	Insurance taxes, licenses and fees, excluding federal income taxes (Exhibit 3, Line 7, Cols. 1 + 2 + 3)		
25. 26.	Increase in loading on deferred and uncollected premiums Net transfers to or (from) Separate Accounts net of reinsurance		(2,290)
27.	Aggregate write-ins for deductions		
28.	Totals (Lines 20 to 27)	720,433	519,499
29.	Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)		
30.	Dividends to policyholders		
31.			
32. 33.	Federal and foreign income taxes incurred (excluding tax on capital gains) Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or	179,847	217,373
	(losses) (Line 31 minus Line 32)		
34.	Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of		
	\$	(1,048)	(398)
35.	Net income (Line 33 plus Line 34) CAPITAL AND SURPLUS ACCOUNT		
36.	Capital and surplus, December 31, prior year (Page 3, Line 38, Col. 2)	10,985,201	10,503,964
37.	Net income (Line 35)		
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		
41. 42.	Change in nonadmitted assets		
43.	Change in reserve on account of change in valuation basis, (increase) or decrease (Exh. 5A, Line 99999999, Col. 4)		
44.	Change in asset valuation reserve	(10,395)	(7,086)
	Change in treasury stock (Page 3, Lines 36.1 and 36.2, Col. 2 minus Col. 1)		
	Surplus (contributed to) withdrawn from Separate Accounts during period		
47.	Other changes in surplus in Separate Accounts Statement		
48. 49.	Change in surplus notes		
50.	Capital changes:		
	50.1 Paid in		
	50.2 Transferred from surplus (Stock Dividend)		
	F		
51.	Surplus adjustment: 51.1 Paid in		
	51.2 Transferred to capital (Stock Dividend)		
	51.4 Change in surplus as a result of reinsurance		
52.	Dividends to stockholders		
	Aggregate write-ins for gains and losses in surplus	35,126	404 007
54. 55.	Net change in capital and surplus for the year (Lines 37 through 53) Capital and surplus, December 31, current year (Lines 36 + 54) (Page 3, Line 38)	(741,615) 10,243,586	481,237 10,985,201
55.	DETAILS OF WRITE-INS	10,243,300	10,300,201
08.301.			
08.302.			
	Summary of remaining write-ins for Line 8.3 from overflow page		
08.399. 2701.	Totals (Lines 08.301 thru 08.303 plus 08.398)(Line 8.3 above)		
2701. 2702.			
2702.			
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		
5302.			
5303. 5398.	Summary of remaining write-ins for Line 53 from overflow page		
	Totals (Lines 5301 thru 5303 plus 5398)(Line 53 above)	35,126	
-		- / -	

## **CASH FLOW**

		1	2
		Current Year	Prior Year
	Cash from Operations		
1.	Premiums collected net of reinsurance	,	
2.	Net investment income		
3.	Miscellaneous income		
4.	Total (Lines 1 through 3)		1,237,3
5.	Benefit and loss related payments		
6.	Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts		
7.	Commissions, expenses paid and aggregate write-ins for deductions		
8.	Dividends paid to policyholders		
9.	Federal and foreign income taxes paid (recovered) net of \$1,088 tax on capital gains (losses)	190,391	225,
10.	Total (Lines 5 through 9)		711,2
11.	Net cash from operations (Line 4 minus Line 10)		526,
	Cash from Investments		
12.	Proceeds from investments sold, matured or repaid:		
	12.1 Bonds	2,071,614	
	12.2 Stocks		
	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		310,
	12.8 Total investment proceeds (Lines 12.1 to 12.7)	2,071,614	882,
3.	Cost of investments acquired (long-term only):		
	13.1 Bonds	1,764,441	
	13.2 Stocks		
	13.3 Mortgage loans		
	13.4 Real estate		
	13.5 Other invested assets		
	13.6 Miscellaneous applications	15,469	
	13.7 Total investments acquired (Lines 13.1 to 13.6)		1,215,
1	Net increase (decrease) in contract loans and premium notes		
4.  5			(1,
5.	Net cash from investments (Line 12.8 minus Line 13.7 minus Line 14)	307,709	(330,
0	Cash from Financing and Miscellaneous Sources		
6.	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		
	16.6 Other cash provided (applied)		34,
7.	Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6)	(1,021,172)	34,
	RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS		
8.	Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	(230,907)	230,
9.	Cash, cash equivalents and short-term investments:		
	19.1 Beginning of year	616,413	
	19.2 End of year (Line 18 plus Line 19.1)	385,506	616,

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

										1	A i d	12	
		1	2	3	Ordinary 4	F	6	Grou	up8	9	Accident and Health 10	11	12 Aggregate of All
		Total	Industrial Life	J Life Insurance	4 Individual Annuities	5 Supplementary Contracts	Credit Life (Group and Individual)	Life Insurance	o Annuities	Group	Credit (Group and Individual)	Other	Other Lines of Business
1.	Premiums and annuity considerations for life and accident and health contracts	.316.302	inddotnar Eno	316.302	individual / initiaties	Contracto	and mannadaly	(4)	/ IIII ditioo	Group	marviadaly	Other	Bacinece
2.	Considerations for supplementary contracts with life contingencies												
3.	Net investment income												
4.	Amortization of Interest Maintenance Reserve (IMR)	5,578		5,578									
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	1,142,323		1,142,323							+		+
9.	Totals (Lines 1 to 8.3)												
10.	Death benefits							-					
11. 12.	Matured endowments (excluding guaranteed annual pure endowments)												
13.	Disability benefits and benefits under accident and health contracts			8, 168									
14.	Coupons, guaranteed annual pure endowments and similar benefits												
15.	Surrender benefits and withdrawals for life contracts												
16.	Group conversions												
17.	Interest and adjustments on contract or deposit-type contract funds	1,436		1,436									
18.	Payments on supplementary contracts with life contingencies												
19.	Increase in aggregate reserves for life and accident and health contracts	191,410		191,410									
20.	Totals (Lines 10 to 19)												
21.	Commissions on premiums, annuity considerations and deposit-type contract funds (direct business only)												
22.	Commissions and expense allowances on reinsurance assumed												
23.	General insurance expenses												
24.	Insurance taxes, licenses and fees, excluding federal income taxes												
25.	Increase in loading on deferred and uncollected premiums	5,924											
26.	Net transfers to or (from) Separate Accounts net of reinsurance												
27. 28.	Totals (Lines 20 to 27)	720,433		720,433									+
28. 29.	Net gain from operations before dividends to policyholders and federal	720,433		720,433									
29.	income taxes (Line 9 minus Line 28)												
30.	Dividends to policyholders												
31.	Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30)												
32.	Federal income taxes incurred (excluding tax on capital gains)	179,847		179,847									
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)	242,043		242.043									
<b>—</b>	DETAILS OF WRITE-INS	2.2,0.0		2.2,310							1 1		1
08.303.	Summary of remaining write-ins for Line 8.3 from overflow page												
	Totals (Lines 08.301 thru 08.303 plus 08.398) (Line 8.3 above)												
	Totais (Lines 08.301 thru 08.303 plus 08.398) (Line 8.3 above)						+			+	+ +		+
				+	<u>+</u>		+			t	-++-		+
2702. 2703.					†		+			†	++		1
	Summary of remaining write-ins for Line 27 from overflow page				†		1			1	++		1
	Totals (Lines 2701 thru 2703 plus 2798) (Line 27 above)												
2100.	(a) Includes the following amounts for FEGLI/SGLI: Line 1	Line 10		Line 16	I	Line 23	1	Line 24		1	1		

## ANALYSIS OF INCREASE IN RESERVES DURING THE YEAR

	1	2		Ordinary		6	Gr	מוומ
		_	3	4	5		7	8
	Total	Industrial Life	Life Insurance	Individual Annuities	Supplementary Contracts	Credit Life (Group and Individual)	Life Insurance	Annuities
Involving Life or Disability Contingencies (Reserves)								
(Net of Reinsurance Ceded)								
1. Reserve December 31, prior year			6, 148, 298					
2. Tabular net premiums or considerations								
3. Present value of disability claims incurred					XXX			
4. Tabular interest			242,648					
5. Tabular less actual reserve released								
6. Increase in reserve on account of change in valuation basis								
7. Other increases (net)								
8. Totals (Lines 1 to 7)	6,657,746		6,657,746					
9. Tabular cost					XXX			
10. Reserves released by death			43,774	xxx	XXX			XXX
11. Reserves released by other terminations (net)	149,346		149,346					
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)			318,038					
15. Reserve December 31, current year	6,339,708		6,339,708					

## ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra National Life Insurance Company EXHIBIT OF NET INVESTMENT INCOME

			1	2	
		Collec	ted During Year	Earned During	Year
1.	U.S. Government bonds	(a)			38,677
1.1	Bonds exempt from U.S. tax				
1.2	Other bonds (unaffiliated)	. (a)		43	39,771
1.3	Bonds of affiliates	. (a)			
2.1	Preferred stocks (unaffiliated)	(b)			45,968
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				11,127
6	Cash, cash equivalents and short-term investments				
7	Derivative instruments	(f)			
8.	Other invested assets				
9.	Aggregate write-ins for investment income		(7)		(7)
10.	Total gross investment income		848,468	83	38,183
11.	Investment expenses			(g)	17,740
12.	Investment taxes, licenses and fees, excluding federal income taxes			(g)	
13.	Interest expense			(h)	
14.	Depreciation on real estate and other invested assets			(i)	
15.	Aggregate write-ins for deductions from investment income				
16.	Total deductions (Lines 11 through 15)				17,740
17.	Net investment income (Line 10 minus Line 16)				20,443
	DETAILS OF WRITE-INS				
0901.	Misc Securities Income		(7)		(7)
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)		(7)		(7)
1501.			. ,		. ,
1502.					
1503.					
1598.	Summary of remaining write-ins for Line 15 from overflow page				
	Totals (Lines 1501 thru 1503 plus 1598) (Line 15, above)				
				1	

(a) Includes \$		accrual of discount less \$	60,980	amortization of premium and less \$	5,011	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 ow	n building	s; and excludes \$	interest on encu	mbrances.
(e) Includes \$		accrual of discount less \$		amortization of premium and less \$		paid for accrued interest on purchases.
(f) Includes \$		accrual of discount less \$		amortization of premium.		
	and Separate Acc			investment taxes, licenses and fe	ees, excluding fede	ral income taxes, attributable to
(h) Includes \$		interest on surplus notes and \$		interest on capital notes.		
(i) Includes \$		depreciation on real estate and \$		depreciation on other inves	ted assets.	

# **EXHIBIT OF CAPITAL GAINS (LOSSES)**

		1	2	3	4	5
				_		
				<b>T D</b>		
		Realized Gain (Loss)	Other Realized	Total Realized Capital Gain (Loss)	Change in Unrealized	Change in Unrealized Foreign Exchange
		On Sales or Maturity	Adjustments	(Columns 1 + 2)	Capital Gain (Loss)	Capital Gain (Loss)
1.	U.S. Government bonds		Adjustitients	(001011113 1 + 2)	Capital Gain (2000)	
1.1	Bonds exempt from U.S. tax					
1.2	Other bonds (unaffiliated)	1 712		1,712		
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)	1.712		1.712		
	DETAILS OF WRITE-INS	,		,		
0901.						
0902.						
0903.						
0998.	Summary of remaining write-ins for Line 9 from overflow page					
0999.	Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above)					

ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra National Life Insurance Company EXHIBIT - 1 PART 1 - PREMIUMS AND ANNUITY CONSIDERATIONS FOR LIFE AND ACCIDENT AND HEALTH CONTRACTS

		1	2		inarv	5		oup		Accident and Health		11
		·		3	4 Individual	Credit Life (Group	6	7	8	9 Credit (Group and	10	Aggregate of All Other Lines of
		Total	Industrial Life	Life Insurance	Annuities	and Individual)	Life Insurance	Annuities	Group	Individual)	Other	Business
-1	FIRST YEAR (other than single) Uncollected											
	Deferred and accrued											
3.	Deferred , accrued and uncollected:											
•	3.1 Direct											
	3.2 Reinsurance assumed											
	3.3 Reinsurance ceded											
	3.4 Net (Line 1 + Line 2)											
	Advance											
	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)											
	9.4 Net (Line 7 - Line 8)											
10	Single premiums and considerations:											
10.	10.1 Direct											
	10.2 Reinsurance assumed											
	10.3 Reinsurance ceded											
	10.4 Net											
	RENEWAL											
	Uncollected	4,573		4,573								
12.	Deferred and accrued Deferred, accrued and uncollected:											
13.	13.1 Direct											
	13.2 Reinsurance assumed											
	13.3 Reinsurance ceded											
	13.4 Net (Line 11 + Line 12)	69.262		69.262								
14.	Advance			2,981								
	Line 13.4 - Line 14											
16.	Collected during year:											
	16.1 Direct											
	16.2 Reinsurance assumed											
	16.3 Reinsurance ceded											
17	16.4 Net Line 15 + Line 16.4											
17. 10	Prior year (uncollected + deferred and accrued - advance)											
10.	Renewal premiums and considerations:	/3,24/		/3,24/								
13.	19.1 Direct											
	19.2 Reinsurance assumed											
	19.3 Reinsurance ceded											
	19.4 Net (Line 17 - Line 18)	316,302		316,302								
	TOTAL											
20.	Total premiums and annuity considerations:											
	20.1 Direct											
	20.2 Reinsurance assumed											
	20.3 Reinsurance ceded											
	20.4 Net (Lines 9.4 + 10.4 + 19.4)	316,302		316,302								

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

	1	2	Ord	inary	5		oup		Accident and Health		11
	T.L		3	4 Individual	Credit Life (Group	6	7	8	9 Credit (Group and	10	Aggregate of All Other Lines of
	Total	Industrial Life	Life Insurance	Annuities	and Individual)	Life Insurance	Annuities	Group	Individual)	Other	Business
DIVIDENDS AND COUPONS APPLIED											
(included in Part 1)											
21. To pay renewal premiums											
22. All other											
REINSURANCE COMMISSIONS AND											
EXPENSE ALLOWANCES INCURRED											
23. First year (other than single):											
23.1 Reinsurance ceded											
23.2 Reinsurance assumed											
23.3 Net ceded less assumed											
24. Single:											
24.1 Reinsurance ceded											
24.2 Reinsurance assumed											
24.3 Net ceded less assumed											
25. Renewal:											
25.1 Reinsurance ceded											
25.2 Reinsurance assumed											
25.3 Net ceded less assumed											
26. Totals:											
26.1 Reinsurance ceded (Page 6, Line 6)											
26.2 Reinsurance assumed (Page 6, Line 22)											
26.3 Net ceded less assumed											
COMMISSIONS INCURRED											
(direct business only)											
27. First year (other than single)											
28. Single											
29. Renewal			944								
30. Deposit-type contract funds											
31. Totals (to agree with Page 6, Line 21)	944		944								
	544	1	344	L	1	1	1		1		

### ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra National Life Insurance Company EXHIBIT 2 - GENERAL EXPENSES

				rance	-	5	6
		1		and Health	4		
		Life	2 Cost Containment	3 All Other	All Other Lines of Business	Investment	Total
1.	Rent		Cost Containment		Bacinoco		
2.							106.543
	5						
	· · · · ·						
	2 Contributions for benefit plans for agents						
	Payments to employees under non-funded benefit plans						
	, ,						470
	Other employee welfare	172					
	0						
	- 9	129					
	Medical examination fees						
4.3							
4.4	Fees of public accountants and consulting actuaries						
4.5	Expense of investigation and settlement of policy claims						
5.1	Traveling expenses	1,409					
5.2	Advertising						
5.3	Postage, express, telegraph and telephone						1,853
5.4	Printing and stationery						768
5.5	Cost or depreciation of furniture and equipment						1.361
5.6							,
5.7							2.93
6.1							4.848
6.2	Bureau and association fees	5.366					5.366
6.3							
6.4	Miscellaneous losses	10 000					12.902
							12,902
6.6							
6.7	Group service and administration fees						
6.8							
7.1	Agency expense allowance						
7.2	Agents' balances charged off (less \$						
	,						
7.3	Agency conferences other than local meetings						
9.1	Real estate expenses						
9.2	Investment expenses not included elsewhere						
9.3	Aggregate write-ins for expenses	2,352					2,352
10.	General expenses incurred						(a)199,208
11.							
12.						1.060	1.060
13.						,	,
14.	Amounts receivable relating to uninsured plans, current year						
15.	General expenses paid during year (Lines 10+11-12-13+14)	181,468				16.857	198,325
10.	DETAILS OF WRITE-INS	101,100				10,007	100,020
00 204		1.603					1,603
		,					1,003
		749					
	Summary of remaining write-ins for Line 9.3 from overflow page						
)9.399.	Totals (Lines 09.301 thru 09.303 plus 09.398) (Line 9.3 above)	2,352					2,352

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

			Insurance		4	5
		1	2	3	]	
				All Other Lines of		<b>-</b>
		Life	Accident and Health	Business	Investment	Total
1.	Real estate taxes					
2.	State insurance department licenses and fees					
3.	State taxes on premiums					
4.	Other state taxes, including \$					
	for employee benefits	3,170				
5.	U.S. Social Security taxes					
6.	All other taxes	6,070				6,070
7.	Taxes, licenses and fees incurred					
8.	Taxes, licenses and fees unpaid December 31, prior year					
9.	Taxes, licenses and fees unpaid December 31, current					
	year	15,619				15,619
10.	Taxes, licenses and fees paid during year (Lines 7 + 8 - 9)	75,307				75,307

### EXHIBIT 4 - DIVIDENDS OR REFUNDS

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

				•	
EXHIBIT 5 - AGGRE		3 3		5	6
				Credit (Group and	
Valuation Standard	Total	Industrial	Ordinary	Individual)	Group
0100001. 58 CSO - CRVM 3.0% (1985 - 1989)					
0100002. 58 CSO - CRVM 4.5% (1980 - 1988)					
0100003. 58 CSO - CRVM 5.5% (1982 - 1983)					
0100004. 58 CET - CRVM 4.5% (1980 - 1988)					
0100005. 58 CET - CRVM 5.5% (1984 - 1986)					
0100006. 80 CSO - CRVM 5.5% (1985 - 1989)					
0100007. 80 CSO - CRVM 6.0% (1982 - 1989)	1,529,951		, ,		
0100008. 80 CSO - NLP 5.5% (1987 - 1989)					
0100009. GIR - 58 CS0 - 2.0% (1982 - 1988)					
0100010. GIR - Extra Mortality on GIR options					
0199997. Totals (Gross)	4,825,576		4,825,576		
0199998. Reinsurance ceded					
0199999. Life Insurance: Totals (Net)	4,825,576		4,825,576		
0299998. Reinsurance ceded		XXX		XXX	
0299999. Annuities: Totals (Net)		XXX		XXX	
0399998. Reinsurance ceded					
0399999. SCWLC: Totals (Net)					
0499998. Reinsurance ceded					
0499999. Accidental Death Benefits: Totals (Net)					
0500001. 1952 INTERCO DISA W/58 CSO - 5.0% (1980 -					
1989)	3 306		3 306		
0500002. 1952 INTERCO DISA W/58 CSO - 4.5% (1980 -					
1989)	2 202		2,292		
0599997. Totals (Gross)	73.057		73.057		
0599998. Reinsurance ceded	73,057		73,057		
0599999. Disability-Active Lives: Totals (Net)	73,057		73,057		
0600001. 1952 INTERCO DISA W/58 CS0 - 3.0% (1980 -					
0699997. Totals (Gross)	106,990		106,990		
0699998. Reinsurance ceded					
0699999. Disability-Disabled Lives: Totals (Net)	106,990		106,990		
0700001. For excess of valuation net premiums over					
corresponding gross premiums on respective					
policies, computed according to the standard of					
valuation required by this state.					
0700002. For non-deduction of deferred fractional					
premiums or return of premiums at the death of					
the insured.					
0700003. AG XXXII Reserve for Immediate Payment of					
Claims					
0700004. Cash Flow Testing Reserve	1,250,000				
0799997. Totals (Gross)	1,334,085		1,334,085		
0799998. Reinsurance ceded	.,		.,		
07999999. Miscellaneous Reserves: Totals (Net)	1,334,085		1,334,085		
	1,007,000		1,007,000		
9999999. Totals (Net) - Page 3, Line 1	6,339,708		6,339,708		
-	•				

## **EXHIBIT 5 - INTERROGATORIES**

1.1	Has the reporting entity ever issued both participating and non-participating contracts?	Yes	3 [	] 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	s [	] 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? If so, attach a statement that contains the determination procedures, answers to the interrogatories and an actuarial opinion as described in the instructions.	Yes	3 [ X	] No	. ]
4.	Has the reporting entity any assessment or stipulated premium contracts in force? If so, state:				[X]
	4.1 Amount of insurance?				
	4.2 Amount of reserve?				
	4.3 Basis of reserve:				
	4.4 Basis of regular assessments:				
	4.5 Basis of special assessments:				
	4.6 Assessments collected during the year				
5.	If the contract loan interest rate guaranteed in any one or more of its currently issued contracts is less than 5%, not in advance, state the contract loan rate guarantees on any such contracts.				
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	3 [	] 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	s [	] 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	Valuatio	4	
	2	3	Increase in Actuarial Reserve Due to Change
Description of Valuation Class	Changed From	Changed To	Change
		-	
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

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

PART 1 - Liability End of Current Year

		1	2	2 Ordinary			6 Group			Accident and Health			
		Total	Industrial Life	3 Life Insurance	4 Individual Annuities	5 Supplementary Contracts	Credit Life (Group and Individual)	7 Life Insurance	8 Annuities	9 Group	10 Credit (Group and Individual)	11 Other	
1 Due and unredde		TOTAL	industrial Life	Life insurance	Individual Annullies	Contracts	and morvioual)	Life insurance	Annumes	Group	individual)	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	2.21 Direct												
	2.22 Reinsurance assumed												
	2.23 Reinsurance ceded										-		
	2.24 Net			(b)	(b)		(b)	(b)		(b)	(b)	(b)	
3. Incurred but unreported:				(6)	(0)		(0)	(0)		(0)	(0)	(0)	
	3.1 Direct												
	3.2 Reinsurance assumed												
	3.3 Reinsurance ceded												
	3.4 Net			(b)2,000	(b)		(b)	(b)		(b)	(b)	(b)	
4. TOTALS	4.1 Direct	2,000		2,000									
	4.2 Reinsurance assumed												
	4.3 Reinsurance ceded												
	4.4 Net	2,000	(a)	(a) 2,000				(a)					
cluding matured endowments	(but not guaranteed annual pure end	lowments) unpaid a	mounting 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).

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

PART 2 - Incurred During the Year

	1	2		Ordinary		6	Gro	up		Accident and Health	
			3	4	5		7	8	9	10	11
	Total	Industrial Life (a)	Life Insurance (b)	Individual Annuities	Supplementary Contracts	Credit Life (Group and Individual)	Life Insurance (c)	Annuities	Group	Credit (Group and Individual)	Other
1. Settlements During the Year:											
1.1 Direct											
1.2 Reinsurance assumed											
1.3 Reinsurance ceded											
1.4 Net	(d)165,741										
<ol> <li>Liability December 31, current year from Part 1:</li> </ol>											
2.1 Direct											
2.2 Reinsurance assumed											
2.3 Reinsurance ceded											
2.4 Net											
<ol> <li>Amounts recoverable from reinsurers December 31, current year</li> </ol>											
4. Liability December 31, prior year:											
4.1 Direct											
4.2 Reinsurance assumed											
4.3 Reinsurance ceded											
4.4 Net											
<ol> <li>Amounts recoverable from reinsurers December 31, prior year</li> </ol>											
6. Incurred Benefits											
6.1 Direct											
6.2 Reinsurance assumed	·		, 								
6.3 Reinsurance ceded											
6.4 Net	165,741		165,741								
Including matured endowments (but not	guaranteed annual pure	endowments) amount	ing to \$	in Line 1.1.	. \$	in Line 1.4.	4	4		· ·	
Ç	,	,		in Line 6.1.		-					
Including matured endowments (but not	guaranteed annual pure	endowments) amount		in Line 1.1.							
Ç	,	,		in Line 6.1.							
ncluding matured endowments (but not	guaranteed annual pure	endowments) amounti		in Line 1.1.							
J	,	,	•	in Line 6.1.							

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#### **EXHIBIT OF NON-ADMITTED ASSETS** 2 3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1) Current Year Total Prior Year Total Nonadmitted Assets Nonadmitted Assets 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 Other invested assets (Schedule BA) ... 7. Receivables for securities 8. Aggregate write-ins for invested assets 9. 10. Subtotals, cash and invested assets (Lines 1 to 9) Title plants (for Title insurers only) 11. 12. Investment income due and accrued 13. Premiums and considerations: 13.1 Uncollected premiums and agents' balances in the course of collection 13.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due 13.3 Accrued retrospective premiums Reinsurance: 14. 14.1 Amounts recoverable from reinsurers 14.2 Funds held by or deposited with reinsured companies 14.3 Other amounts receivable under reinsurance contracts Amounts receivable relating to uninsured plans 15. 16.1 Current federal and foreign income tax recoverable and interest thereon (6,675) 16.2 Net deferred tax asset .650,406 .643,731 17. Guaranty funds receivable or on deposit 18. Electronic data processing equipment and software 19. Furniture and equipment, including health care delivery assets 20. Net adjustment in assets and liabilities due to foreign exchange rates 21. Receivables from parent, subsidiaries and affiliates 22. Health care and other amounts receivable 23. Aggregate write-ins for other than invested assets 24. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts .650.406 .643.731 (6.675) (Lines 10 to 23) 25. From Separate Accounts, Segregated Accounts and Protected Cell Accounts 650,406 643,731 (6, 675)Total (Lines 24 and 25) 26. DETAILS OF WRITE-INS 0901. 0902. 0903. 0998. Summary of remaining write-ins for Line 9 from overflow page Totals (Lines 0901 thru 0903 plus 0998)(Line 9 above) 0999. Accounts and notes receivable 2301. 2302. 2303. 2398. Summary of remaining write-ins for Line 23 from overflow page Totals (Lines 2301 thru 2303 plus 2398)(Line 23 above) 2399.

#### 1. Summary of Significant Accounting Policies

### A. Accounting Practices

The accompanying financial statements of Symetra National Life Insurance Company (the Company) have been prepared in conformity with the National Association of Insurance Commissioners (NAIC) Accounting Practices and Procedures Manual and Annual Statement Instructions, except to the extent that practices prescribed or permitted by the Office of the Insurance Commissioner of the State of Washington (the Department) differ. No differences exist in the prescribed or permitted practices that result in a material effect on surplus at either December 31, 2009 or 2008.

Under Washington State Insurance code RCW 48.13.240(3), a mutual fund is classified as a miscellaneous investment and investment in a single entity's mutual fund is limited to no more than one percent (1%) of an insurer's admitted assets. The Company, with the explicit permission of the Department is permitted to invest up to four percent (4%) of its assets in a single entity's mutual funds, as well as an unlimited amount of its assets in mutual funds listed on the NAIC's most recent Mutual Fund Lists as U.S. Direct Obligations/Full Faith and Credit Exempt. As of December 31, 2009 and 2008, the Company held \$369,696 or 2.2% and \$593,547 or 3.4%, respectively, of admitted assets in a single entity's mutual fund, JP Morgan Overnight Sweep. 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 requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities. It also requires disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

#### C. 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 not backed by other loans and hybrid bonds typically referred to as a capital security or as a trust preferred security are stated at amortized cost using the scientific method, except for those with a NAIC designation of 6, which are reported at the lower of amortized cost or fair value.
- (3) The Company does not currently invest in common stocks.
- (4) Highest quality, high quality, or medium quality redeemable preferred stocks (NAIC designations 1 to 3), which have characteristics of debt securities are valued at cost or amortized cost. All other redeemable preferred stocks (NAIC designations 4 to 6) are reported at the lower of cost, amortized cost, or fair value. Highest quality, high quality, or medium quality perpetual preferred stocks (NAIC designations 1 to 3), which have characteristics of equity securities are valued at cost. All other perpetual preferred stocks (NAIC designations 4 to 6) are reported at the lower of costs (NAIC designations 1 to 3), which have characteristics of equity securities are valued at cost. All other perpetual preferred stocks (NAIC designations 4 to 6) are reported at the lower of cost or fair value.
- (5) The Company does not currently invest in mortgage loans.
- (6) Loan-backed securities are valued and reported in accordance with the NAIC Purposes and Procedures of the Securities Valuation Office (SVO) manual and Statement of Statutory Accounting Principles (SSAP) No. 43-Revised, "Loan-backed and Structured Securities". Agency loan-backed and structured securities, subject to a single NAIC designation and for which the collection of all contractual cash flows is probable, are reported at amortized cost using the retrospective methodology consistently applied by type of security, except for those with an NAIC designation of 6, which are reported at the lower of amortized cost or fair value. The retrospective methodology changes both the yield and the asset balance so that the expected future cash flows produce a return on the investment equal to the return now expected over the life of the investment as measured from the date of acquisition.

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

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

- (7) The Company 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 and health contracts.
- (12) The Company has not modified its capitalization policy from prior year.
- (13) The Company has no pharmaceutical rebate receivables.

### 2. Accounting Changes and Correction of Errors

The Company adopted SSAP No. 43-R, "*Loan-backed and Structured Securities*" as of September 30, 2009. This SSAP substantively revises SSAP No. 43 and supersedes SSAP No. 98, "*Treatment of Cash Flows When Quantifying Changes in Valuations and Impairments*" and paragraph 13 of SSAP No. 99, "*Accounting for Certain Securities Subsequent to an Other-Than-Temporary Impairment*". It revised valuation and impairment requirements to be based on the present value of cash flows expected to recover the entire amortized cost basis, and requires securities that the Company intends to sell to be recorded at fair value. There is no cumulative effect on adoption of SSAP 43-R. The discount rate used to calculate the present value of the cash flows expected to be collected was the rate in effect before recognizing any other-than-temporary impairments.

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

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

There were no errors discovered during the years ended December 31, 2009 or 2008.

## 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 the creditor.

### C. Reverse Mortgages

The Company has no reverse mortgages.

### D. Loan-Backed Securities

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

			<b>Excess of Statement</b>
	Statement		over Fair Value (-)
	(Admitted)	Fair	or Fair Value over
	Value	Value	Statement (+)
Mortgage-backed			
securities	\$3,126,434	\$3,152,591	\$26,157
Total	\$3,126,434	\$3,152,591	\$26,157

In accordance with the NAIC Purposes and Procedures of the SVO manual, fair values reflect the price at which the security would sell in an arms length transaction between a willing buyer and seller in possession of the same information. The Company uses quoted market prices from independent third party pricing services or public market information to determine the fair value of its loan-backed securities when such information is available. When such information is not available for investments, the Company uses other valuation techniques. Such techniques include evaluating discounted cash flows, identifying comparable securities with quoted market prices, and using internally prepared valuations based on modeling and pricing methods.

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

Issuer	Book / Adjusted Carrying Value
Master Asset Securitization	\$270,245
	\$270,245

(4) Other -than- temporary impairments for loan-backed securities:

#### None

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

None

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

	Gross Amortized Cost	Gross Unrealized Gains	Gross Unrealized Losses	Fair Value	
Mortgage-backed securities	\$3,126,434	\$71,761	(\$45,604)	\$3,152,591	
Total	\$3,126,434	\$71,761	(\$45,604)	\$3,152,591	
	Less than	12 months	12 month	s or more	Total
	Fair Value	Gross Unrealized Losses	Fair Value	Gross Unrealized Losses	Fair Gross Value Losses
Mortgage-backed					
			AAAA 107	$(\Phi 20, 050)$	$\phi_{7,45,660}$ ( $\phi_{45,604}$ )
securities	\$513,482	(\$7,546)	\$232,187	(\$38,058)	\$745,669 (\$45,604)

- (7) We analyze investments in loan-backed securities that meet our impairment criteria to determine whether the decline in value is other-than-temporary. To make this determination for each security, we consider both quantitative and qualitative criteria including:
  - How long and by how much the fair value has been below cost or amortized cost;
  - The financial condition and near-term prospects of the issuer of the security, including any specific events
  - that may affect its operations or earnings potential, or compliance with terms and covenants of the security;Any downgrades of the security by a rating agency;
  - Any reduction or elimination of dividends or nonpayment of scheduled interest payments; and
  - Our intent to sell the security or whether the Company has the intent and ability to retain the investment for a period of time sufficient to recover the amortized cost basis.
- (8) Not applicable.
- E. Repurchase Agreements

The Company has no investments in repurchase agreements.

F. Real Estate

The Company has no investments in real estate.

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

The Company has no investments in LIHTC.

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

- A. The Company has no investments in joint ventures, partnerships or limited liability companies that exceed 10% of its admitted assets.
- B. The Company did not recognize any impairment write down for investments in joint ventures, partnerships or limited liability companies during the statement periods.

### 7. Investment Income

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

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

B. There was no investment income due and accrued excluded from surplus as of December 31, 2009 or 2008.

#### 8. Derivative Instruments

The Company has no investments in derivative instruments.

### 9. Income Taxes

A.

Deferred Tax Components:	<u>12</u>	/31/2009	<u>12/31/2008</u>		
1. Gross Deferred Tax Assets – Ordinary	\$	778,832	\$	741,480	
2. Gross Deferred Tax Assets – Capital		0		0	
3. Total Gross Deferred Tax Assets		778,832		741,480	
4. Statutory Valuation Allowance – Ordinary		0		0	
5. Statutory Valuation Allowance – Capital		0		0	
6. Adjusted Gross Deferred Tax Assets		778,832		741,480	
7. Deferred Tax Liabilities – Ordinary		(61,084)		(58,192)	
8. Deferred Tax Liabilities – Capital		0		0	
9. Net Deferred Tax Asset (Liability)		717,748		683,288	
10. Deferred Tax Assets Nonadmitted – Ordinary		(650,406)		(643,731)	
11. Deferred Tax Assets Nonadmitted – Capital		0		0	
12. Total Deferred Tax Assets Admitted (per SSAP No.					
10R)	\$	67,342	\$	39,557	
13. (Incr.) Decr. in Deferred Tax Assets - Nonadmitted	\$	(6,675)	\$	38,866	

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

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

	12/	/31/2009	12/31	/2008	Change
Increased amt of admitted assets under paragraph 10.e Ordinary	\$	35,126	\$	0	\$ 35,126
Increased amt of admitted assets under paragraph 10.e Capital		0		0	0
Total incr. amt of admitted assets under paragraph 10.e.	\$	35,126	\$	0	\$ 35,126

### Summary of Admitted Adjusted Gross Deferred Tax Assets

	Ordinary	Cap	ital	Total
Amount admitted under paragraph 10.a.	\$ 32,215	\$	0	\$ 32,215
Amount admitted under paragraph 10.b.i.	0		0	0
Amount admitted under paragraph 10.c.	 61,084		0	61,084
Total admitted under paragraphs 10.a. through 10.c.	93,299		0	93,299
Amount admitted under paragraph 10.e.i.	67,341		0	67,341
Amount admitted under paragraph 10.e.ii.a.	0		0	0
Amount admitted under paragraph 10.e.iii.	 61,084		0	61,084
Total admitted under paragraphs 10.a. through 10.c.	128,425		0	128,425
Additional amount admitted under paragraph 10.e.	\$ 35,126	\$	0	\$ 35,126
Ten percent of statutory surplus under paragraph 10.b.ii.	\$ 1,124,388			
Fifteen percent of statutory surplus under paragraph 10.e.ii.b.	\$ 1,686,582			
Risk Based Capital Amount Utilized in Paragraph 10.d.				
Total Adjusted Capital	\$ 10,258,951			
Authorized Control Level	\$ 113,617			

### Increased Amount of Admitted DTAs, Admitted Assets, Statutory Surplus, and Total Adjusted Capital

	SSAP No. 10R Paragraphs 10.a10.c.	SSAP No. 10R Paragraph 10.e.	Increased Amount
Admitted Deferred Tax Assets	\$ 93,299	\$ 128,425	\$ 35,126
Admitted Assets	\$ 16,748,988	\$ 16,784,114	\$ 35,126
Statutory Surplus	\$ 10,208,460	\$ 10,243,586	\$ 35,126
Total Adjusted Capital	\$ 10,258,951	\$ 10,294,077	\$ 35,126

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

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

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

Current Income Taxes:	<u>12</u>	2/31/2009	<u>1</u> 2	2/31/2008		
Current Year Tax Provision Before Tax Credits	\$	175,125	\$	213,981		
Prior Year Under/(Over) Accrual		4,722		3,392		
Income Tax Expense From Operations		179,847		217,373		
Taxes on Capital Gains/(Losses)		1,647		436		
Current Income Taxes Incurred	\$	181,494	\$	217,809		
The main components of Deferred Tax amounts are as follows:						
Assets	12	2/31/2009	12	2/31/2008	(	Change
Investments	\$	2,389	\$	2,728	\$	(339)
Non-Admitted Assets		0		0		0
Proxy DAC		42,036		46,767		(4,731)
Reserves		733,496		691,190		42,306
All Others		911		795		116
Total Deferred Tax Assets	\$	778,832	\$	741,480	\$	37,352
Total Deferred Tax Asset – Nonadmitted	\$	650,406	\$	643,731	\$	6,675
Liabilities						
Investments	\$	36,842	\$	31,478	\$	5,364
Deferred Premium/Loading	<u> </u>	24,242		26,714	<u> </u>	(2,472)
Total Deferred Tax Liabilities	\$	61,084	\$	58,192	\$	2,892
Net Change in Deferred Tax Asset (Liability)					\$	34,460
Surplus Adjustments:						
Adjustments to Prior Year Net Deferred Tax Assets						(4,722)
Change in Net Deferred Income Taxes					\$	29,738

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

### D. Significant Statutory to Tax Adjustments on Current Taxes:

Ordinary Income Tax at Federal Statutory rate (35%) Capital Income Tax at Federal Statutory rate (35%)	<u>1</u> \$	<u>2/31/2009</u> 147,662 599	<u>1</u> \$	<u>2/31/2008</u> 240,802 38
Total IncomeTax	\$	148,261	\$	240,840
Other Permanent Items		725		976
Change in IMR		(1,952)		(3,111)
Prior Year Adjustment		4,722		3,392
Federal Income Tax Expense (Benefit)	\$	151,756	\$	242,097
Federal & Foreign Taxes Incurred	\$	81,494	\$	217,809
Change in Net Deferred Income Taxes		(29,738)		24,288
Total Statutory Income Taxes	\$	51,756	\$	242,097

- E. (1) The Company files a life insurance consolidated tax return with its parent company, Symetra Life Insurance Company. As a result, any loss carryforwards are calculated on a consolidated basis. As of December 31, 2009, the consolidated return had no loss carryforwards estimated.
  - (2) The amount of federal income taxes incurred are available for recovery in the event of the carryback of future net losses is as follows:

	<u>2009</u>	<u>2008</u>	<u>2007</u>
Ordinary Income	\$ 175,125	\$ 218,703	\$ 211,765
Capital Gain	\$ 1,647	\$ 436	\$ 1,038

(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 the companies is subject to written agreement, approved by the Board of Directors. Allocation is based upon separate return calculations, except that current credit for tax credits and net operating loss carryforwards are determined on the basis of the consolidated group. Intercompany tax balances are settled quarterly.
- (3) The Company's federal income tax returns have been examined and closing agreements have been executed with the Internal Revenue Service, or the statute of limitations has expired for all tax periods through December 31, 2003. The Internal Revenue Service is in the process of auditing the Company's returns for the tax year ended July 31, 2004 filed in consolidation with the Company's former parent, Safeco Corporation. To date, no significant or proposed adjustments have been raised by the examiners. The Internal Revenue Service has also completed an audit of the Company's returns and the statute of limitations has closed for the years ended December 31, 2004 and 2005.

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

A. B. and C. The following material related party transactions, excluding reinsurance transactions and any noninsurance transactions that were less than .5% of the Company's admitted assets, were entered into by the Company with an affiliate:

During the year ended December 31.
------------------------------------

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

There were no material related party transactions during the year ended December 31, 2008.

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

	<u>12/31/09</u>	<u>12/31/08</u>
Symetra Life Insurance Company	\$ (20,232)	\$ (39,187)
White Mountains Advisors, LLC	( 2,363)	(2,366)
Total	\$ (22,595)	\$ (41,553)

- E. The Company has not agreed to any guarantees for affiliates that result in a material contingent exposure.
- F. The Company entered into a Services and Shared Expenses Agreement with its affiliates under common ownership with Symetra Financial Corporation, whereby the parties each agree to provide and receive from each other certain general services (related to sharing common management, personnel, and facilities) and to share the expenses thereof. The agreement was effective December 15, 2005, following prior notice of the transaction to the Washington Office of Insurance Commissioner pursuant to insurance company law.

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

- 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 either Symetra Life Insurance Company or Symetra Financial Corporation.
- I. Investments in Subsidiary, Controlled or Affiliated Companies (SCAs) 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. The Company has no legal obligation for the benefits under these plans.

The plan covers substantially all employees. Symetra Life Insurance Company's contributions to these plans are made in cash.

The defined contribution plan is a 401(k)/profit sharing plan that 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, 2009 and 2008.

- 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 State of Washington Office of the Insurance Commissioner. This restriction is the greater of statutory net gain from operations for the previous year or 10% of policyholder surplus at the close of the previous year, subject to a maximum limit equal to statutory unassigned funds. Based on this restriction, the maximum dividend payout that may be made without prior approval in 2010 is \$1,024,359.
- (4) The Company paid dividends of \$1,000,000 during the year ending December 31, 2009. The Company paid no dividends during the year ending December 31, 2008. A dividend schedule is provided in Note 10.
- (5) Within the limitations of (3) above, there are no restrictions placed on the portion of Company profits that may be paid as ordinary dividends to its shareholder.
- (6) The unassigned surplus funds are held for the benefit of the Company's shareholder, as the Company does not issue participating business.
- (7) There have been no advances to surplus.
- (8) The Company holds no stock for special purposes.
- (9) The increase in special surplus funds of \$35,126 was due to the implementation of SSAP No. 10R, *Income Taxes*, on December 31, 2009.
- (10) There was no increase (decrease) of unassigned funds (surplus) due to cumulative unrealized gains or losses at December 31, 2009 or 2008.
- (11) The Company has no surplus notes.
- (12) Impact of any restatement due to a quasi-reorganizations Not applicable.
- (13) Effective date of quasi-reorganization Not applicable.

### 14. Contingencies

- A. The Company has made no commitments or contingent commitments to a SCA entity.
- B. The Company is subject to guaranty fund and other assessments by the states in which it writes business. Guaranty fund assessments are accrued at the time of insolvencies as they become known to the Company and if they are material. Other assessments are accrued at the time of assessment, or, in the case of loss-based assessments, at the time the losses are incurred. Based upon information provided by the National Organization of Life and Health Insurance Guaranty Association (NOLHGA), the Company has accrued a liability for guaranty fund assessments of \$10,078 and a related premium tax benefit asset of \$7,472. The amounts represent management's best estimates based on information received from the states in which the Company writes business and may change due to many factors including the Company's share of the ultimate cost of current insolvencies.
- C. The Company has no material gain contingencies to report. See Note 14E.
- D. Claims related extra contractual obligation and bad faith losses stemming from lawsuits Not applicable
- E. Various lawsuits against the Company can arise in the course of the Company's business. Contingent liabilities arising from litigation, income taxes and other matters are not considered material in relation to the financial position of the Company.

### 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. The Company has no transfers of receivables recorded as sales.
- B. Transfer and Servicing of Financial Assets Not applicable.
- C. The Company had no transactions which met the definition of wash sales as stated in SSAP No. 91, "Accounting for Transfers and Servicing of Financial Assets and Extinguishment of Liabilities", for securities with a NAIC designation of 3 or below or unrated securities for the year ended December 31, 2009.
- 18. Gain or Loss to the Reporting Entity from Uninsured A&H Plans and the Uninsured Portion of Partially Insured Plans Not applicable
- **19. Direct Premium Written/Produced by Managing General Agents/Third Party Administrators** Not applicable

### 20. Other Items

- A. Extraordinary Items Not applicable.
- B. Troubled Debt Restructuring Not applicable.
- C. Other Disclosures Assets in the amount of \$2,368,372 and \$2,366,105 were on deposit with government authorities or trustees as required by law, as of December 31, 2009 and 2008, respectively.
- D. The Company does not carry any significant uncollected premium balances that are considered uncollectible.
- E. Business Interruption Insurance Recoveries Not applicable.
- F. State Transferable Tax Credits Not applicable.
- G. Subprime Mortgage Related Risk Exposure Not applicable.

### 21. Events Subsequent

#### Type I: Recognized Subsequent Events:

The Company has not experienced any events that provide additional evidence with respect to conditions that existed at the date of the balance sheet and affect the estimates inherent in the process of preparing the financial statements. Subsequent events have been considered through February 26, 2010 for the statutory statement issued on February 26, 2010.

### Type II: Nonrecognized Subsequent Events:

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

The Company has not experienced any other events that provide additional evidence with respect to conditions that did not exist at the date of the balance sheet but arose subsequent to that date. Subsequent events have been considered through February 26, 2010 for the statutory statement issued on February 26, 2010.

22. Reinsurance

Not applicable

- 23. Retrospectively Rated Contracts & Contracts Subject to Redetermination Not applicable
- 24. Change in Incurred Losses and Loss Adjustment Expenses Not applicable
- **25. Intercompany Pooling Arrangements** Not applicable
- **26. Structured Settlements** Not applicable
- **27. Health Care Receivable** Not applicable
- **28.** Participating Policies Not applicable
- **29. Premium Deficiency reserves** Not applicable

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

- (1) The Company waives deduction of deferred fractional premiums upon death of insured and returns any portion of the final premium beyond the date of death. Surrender values are not promised in excess of legally computed reserves.
- (2) Policies for substandard lives are charged an extra premium plus the gross premium for a rated age. Mean reserves are determined by computing the regular mean reserve for the plan at any rated age and holding in addition one-half (1/2) of any extra premium charge for the year.
- (3) As of December 31, 2009, the Company had \$4,772,077 of insurance in force for which the gross premiums were less than the net premiums according to the standard valuation established by the state of Washington. Reserves to cover the above insurance are reported in Exhibit 5, Miscellaneous Reserves Section, as \$67,488 at December 31, 2009.
- (4) The Tabular Interest has been determined by formula as described in the instructions.
- (5) In the determination of Tabular Interest on funds not involving life contingencies for each valuation rate of interest, the Tabular Interest is calculated as the change in reserves minus premiums plus benefits. Interest is verified by comparison to the general ledger.
- (6) The Company had no significant other reserve changes.

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

There are no Annuity Actuarial Reserves or Deposit Type Liabilities.

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

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

Туре	Gross	Net of Loading
Ordinary – New Business Ordinary – Renewal	\$    0 69,262	\$0 54,100
Total	\$ 69,262	\$ 54,100

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

Туре	Gross	Net of Loading
Ordinary – New Business Ordinary – Renewal	\$    0 76,323	\$ 0 67.085
Total	\$ 76,323	67,085 \$ 67,085

## **33. Separate Accounts**

Not applicable

**34. Loss/Claim Adjustment Expenses** Not applicable

## 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 whic is an insurer?	
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?	[X] No [] N/A []
1.3	State Regulating?	Washington
2.1	Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity?	Yes [ ] No [X]
2.2	If yes, date of change:	
3.1	State as of what date the latest financial examination of the reporting entity was made or is being made.	12/31/2005
3.2	State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released.	12/31/2005
3.3	State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date).	02/27/2008
3.4	By what department or departments? Washington	
3.5	Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments?	[] No [] N/A [X]
3.6	Have all of the recommendations within the latest financial examination report been complied with?	[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 ]
т. <u>с</u>	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? 4.22 renewals?	
5.1	Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?	Yes [ ] No [ X ]
5.2	If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased t exist as a result of the merger or consolidation.	0
	1         2         3           Name of Entity         NAIC Company Code         State of Domicile	
6.1	Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended revoked by any governmental entity during the reporting period?	
6.2	If yes, give full information:	
7.1	Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity?	Yes [X] No [ ]
7.2	If yes, 7.21 State the percentage of foreign control;	18.8 %
	<ul> <li>7.21 State the percentage of horeign control,</li> <li>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).</li> </ul>	<u>10.0</u> %
	1 2	7

Nationality	Type of Entity
Bermuda	Corporation
	1

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

8.3 8.4	Is the company affiliated with one or more banks, thrifts or securities If response to 8.3 is yes, please provide the names and locations (cit financial regulatory services agency [i.e. the Federal Reserve Boarc Thrift Supervision (OTS), the Federal Deposit Insurance Corporatio the affiliate's primary federal regulator.	y and state of the main office) of any affiliates re I (FRB), the Office of the Comptroller of the Cur	egulated by a rency (OCC)	a federal ), the Offi	ce of	Yes [ X	[] No [	]
	1	2	3	4	5	6	7	
	Affiliate Name Symetra Investment Services, Inc	Location (City, State)	FRB	OCC	OTS NO	FDIC	SEC YES	
	Symetra Securities, Inc.	Bellevue, WA	N0	NO	NO	NO	YES	
9.	What is the name and address of the independent certified public act Ernst & Young LLP Suite 3500 999 Third Avenue Seattle, WA 98104					-		
10.	What is the name, address and affiliation (officer/employee of the rep firm) of the individual providing the statement of actuarial opinion/ce Dena Simone Thompson, FSA, MAAA Senior Actuary and Assistant Vice President Symetra Life Insurance Company 777 108th Avenue NE, Suite 1200 MS: SC-14 Bellevue, WA 98004	rrtification?			Ū			
11.1	Does the reporting entity own any securities of a real estate holding of	company or otherwise hold real estate indirectly I estate holding company	?			Yes [	] No [ X	]
		arcels involved						
	•	djusted carrying value						
11.2	If, yes provide explanation:					•		
12.	FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTI							
12.1	What changes have been made during the year in the United States	manager or the United States trustees of the re	porting entity	y?				
12.2	Does this statement contain all business transacted for the reporting	, ,				Yes [	] No [	]
12.3	Have there been any changes made to any of the trust indentures du						] No [	]
12.4 13.1	If answer to (12.3) is yes, has the domiciliary or entry state approved Are the senior officers (principal executive officer, principal financial of					] No [	] N/A [	]
10.1	<ul> <li>(a) Honest and ethical conduct, including the ethical handling of acture relationships;</li> <li>(b) Full, fair, accurate, timely and understandable disclosure in the period.</li> </ul>	which includes the following standards? al or apparent conflicts of interest between pers	onal and pro			Yes [ X	[] No [	]
	<ul> <li>(c) Compliance with applicable governmental laws, rules and regulati</li> <li>(d) The prompt internal reporting of violations to an appropriate person</li> </ul>	ions;	ig entity,					
13.11	(e) Accountability for adherence to the code. If the response to 13.1 is No, please explain:							
10.0						V F		,
13.2 13.21	If the response to 13.2 is Yes, provide information related to amendm	nent(s).				Yes [	] No [ X	1
13.3	Have any provisions of the code of ethics been waived for any of the					Yes [	] No [ X	]

14.	Is the purchase or sale of all investments of the reporting entity passed upon either by the board of directors or a subordinate committee thereof?	Yes [ X ]	No [	 ]
15.	Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof?	Yes [X]	No [	 1
16.	Has the reporting entity an established procedure for disclosure to its board of directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict with the official duties of such person?	Yes [ X ]	No [	 I

## **GENERAL INTERROGATORIES**

### FINANCIAL

	FINANCIAL	
17.	Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)?	Yes [ ] No [X]
18.1	Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans): 18.11 To directors or other officers	\$0
	18.12 To stockholders not officers	
	18.13 Trustees, supreme or grand (Fraternal Only)	
10.0		<u>\$</u> 0
18.2	Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans): 18.21 To directors or other officers	\$ 0
	18.22 To stockholders not officers	
	18.23 Trustees, supreme or grand	
	(Fraternal Only)	\$0
19.1	Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reported in the statement?	
19.2	If yes, state the amount thereof at December 31 of the current year: 19.21 Rented from others	\$
	19.22 Borrowed from others	
	19.23 Leased from others	\$
	19.24 Other	\$
20.1	Does this statement include payments for assessments as described in the Annual Statement Instructions other than guaranty fund or guaranty association assessments?	
20.2	If answer is yes, 20.21 Amount paid as losses or risk adjustment s	
	20.22 Amount paid as expenses	
	20.23 Other amounts paid	
21.1	Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement?	
21.2	If yes, indicate any amounts receivable from parent included in the Page 2 amount:	\$
22.1	INVESTMENT Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)	Yes [X] No []
22.1 22.2	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in	Yes[X] No[]
	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)	Yes[X] No[]
22.2	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3) If no, give full and complete information relating thereto: For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)	
22.2 22.3	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3) If no, give full and complete information relating thereto: For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided) Reference notes	] No [ ] N/A [ X ]
22.2 22.3 22.4	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3) If no, give full and complete information relating thereto: For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided) Reference notes Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?	] No [ ] N/A [ X ] \$
22.2 22.3 22.4 22.5	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided) Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?       Yes [         If answer to 22.4 is YES, report amount of collateral.	] No [ ] N/A [ X ] \$\$
22.2 22.3 22.4 22.5 22.6 23.1	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)         Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         If answer to 22.4 is NO, report amount of collateral.         Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).	] No [ ] N/A [ X ] \$ \$ Yes [ X ] No [ ]
<ul> <li>22.2</li> <li>22.3</li> <li>22.4</li> <li>22.5</li> <li>22.6</li> <li>23.1</li> </ul>	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided) Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         If answer to 22.4 is NO, report amount of collateral.         Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).         If yes, state the amount thereof at December 31 of the current year:       23.21 Subject to repurchase agreements	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$0
22.2 22.3 22.4 22.5 22.6 23.1	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)         Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         If answer to 22.4 is NO, report amount of collateral.         Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$0 \$0
<ul> <li>22.2</li> <li>22.3</li> <li>22.4</li> <li>22.5</li> <li>22.6</li> <li>23.1</li> </ul>	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)         Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).         If yes, state the amount thereof at December 31 of the current year:       23.21 Subject to repurchase agreements	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$0 \$0 \$0
<ul> <li>22.2</li> <li>22.3</li> <li>22.4</li> <li>22.5</li> <li>22.6</li> <li>23.1</li> </ul>	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 22.3)	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$0 \$0 \$0 \$0 \$0
<ul> <li>22.2</li> <li>22.3</li> <li>22.4</li> <li>22.5</li> <li>22.6</li> <li>23.1</li> </ul>	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)         Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         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, sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).         If yes, state the amount thereof at December 31 of the current year:       23.21 Subject to reverse agreements         23.25 Pledged as collateral       23.25 Pledged as collateral         23.26 Pleaced under option agreements       23.26 Pleaced under option agreements	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$0 \$0 \$0 \$0 \$0 \$0
22.2 22.3 22.4 22.5 22.6 23.1	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)         Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         If answer to 22.4 is NO, report amount of collateral.         Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).         If yes, state the amount thereof at December 31 of the current year:       23.21 Subject to repurchase agreements	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
22.2 22.3 22.4 22.5 22.6 23.1	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in         If no, give full and complete information relating thereto:         For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 16 where this information is also provided)         Reference notes         Does the Company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?         If answer to 22.4 is YES, report amount of collateral.         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, sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 19.1 and 22.3).         If yes, state the amount thereof at December 31 of the current year:       23.21 Subject to reverse agreements         23.25 Pledged as collateral       23.25 Pledged as collateral         23.26 Pleaced under option agreements       23.26 Pleaced under option agreements	] No [ ] N/A [ X ] \$\$ Yes [ X ] No [ ] \$00 \$00

### 23.3 For category (23.27) provide the following:

	1 Nature of Restriction	2 Description	3 Amount
24.1	Does the reporting entity have any hedging transactions reported on So	shedule DB?	Yes [ ] No [ X ]
24.2	If yes, has a comprehensive description of the hedging program been n If no, attach a description with this statement.	nade available to the domiciliary state? Yes [	] No [ ] N/A [ X ]
25.1	Were any preferred stocks or bonds owned as of December 31 of the c issuer, convertible into equity?		Yes [ ] No [X]
25.2	If yes, state the amount thereof at December 31 of the current year		\$

Excluding items in Schedule E - Part 3 - Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 3, III Conducting Examinations, F - Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook? 26.

Yes [ X ] No [ ]

Yes [ ] No [ X ]

Yes [ ] No [ X ]

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

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

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

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

#### 26.03 Have there been any changes, including name changes, in the custodian(s) identified in 26.01 during the current year? 26.04 If yes, give full and complete information relating thereto:

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

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

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

#### Does the reporting entity have any diversified mutual funds reported in Schedule D, Part 2 (diversified according to the Securities and 27.1 Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5(b)(1)])? If yes, complete the following schedule:

27.2

....

1	2	3
		Book/Adjusted
CUSIP #	Name of Mutual Fund	Carrying Value
27 2999 - Total		

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

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

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. 28.

	1	2	3
			Excess of Statement
			over Fair Value (-), or
	Statement (Admitted)		Fair Value over
	Value	Fair Value	Statement (+)
28.1 Bonds			
28.2 Preferred stocks			(6,795)
28.3 Totals	16,261,409	16,954,617	693,208

28.4 De cribe th ethods utilized in determining the fair value

28.4	Describe the sources or methods utilized in determining the fair values:						
	The Company has elected to use the same pricing methodology and sources as utilized for obtaining GAAP fa price at which the security would sell in an arms length transaction between a willing buyer and seller in poss The Company uses quoted market prices from independent third party pricing services or public market infor value of its investments when such information is available. When such information is not available for inves securities that are not publicly traded, we determine fair value using other valuation techniques. Such technic discounted cash flows, identifying comparable securities with quoted market prices, and using internally prep certain modeling and pricing methods.	ession of the same info mation to determine the tments, as in the case ues include evaluating	rmation. e fair of				
29.1	Was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Scher	dule D?		Yes [	] [	√o[)	(]
29.2	If yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic custodians used as a pricing source?			Yes [	] [	No [	]
29.3	If no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosurd. We utilize a nationally recognized independent third party pricing service for the majority of the prices used to assurance on the overall reasonableness and consistent application of input assumptions, valuation methodo accounting standards for fair value determination through various processes including, but not limited to, eva methodologies, analytical reviews of certain prices and back-testing of selected sales activity to determine we differences between the market price used to value the security prior to sale and the actual sales prices.	determine fair value. W blogies and compliance luation of pricing	e gain with				
30.1 30.2	Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Securities Valuation Office If no, list exceptions:	ce been followed?		Yes [ X	[] [	√o [	]
	OTHER						
31.1	Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any?		\$				0
31.2	List the name of the organization and the amount paid if any such payment represented 25% or more of the to service organizations and statistical or rating bureaus during the period covered by this statement.	tal payments to trade a	ssociations,				
	1 Name	2 Amount Paid					
32.1	Amount of payments for legal expenses, if any?		\$				129
32.2							
	1 Name	2 Amount Paid					
33.1	Amount of payments for expenditures in connection with matters before legislative bodies, officers or department		ny?\$				0
33.2	List the name of the firm and the amount paid if any such payment represented 25% or more of the total paym connection with matters before legislative bodies, officers or departments of government during the period connection with matters before legislative bodies.	ent expenditures in overed by this statemen	t.				
	1	2					
	Name	Amount Paid					

### PART 2 - LIFE INTERROGATORIES

1.1	Does	the reporting entity have any direct Medicare Supplement Insurance in force?		Yes [	] No [ X ]
1.2	lf 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 Exp	periance Exhibit?	¢	
1.0		Reason for excluding:		Ψ	
1.4	Indica	te amount of earned premium attributable to Canadian and/or Other Alien not in	ncluded in Item (1.2) above.	\$	
1.5	Indica	te total incurred claims on all Medicare Supplement Insurance.		\$	
1.6	Individ	dual policies:	Most current three years: 1.61 Total premium earned	ŧ	
			1.62 Total incurred claims		
			1.63 Number of covered lives		
			All years prior to most current three years		
			1.64 Total premium earned		
			1.66 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.	Healt	n Test:			
۲.	rican		1 2		
			Current Year Prior Year		
	2.1 2.2	Premium Numerator Premium Denominator			
	2.2	Premium Ratio (2.1/2.2)			
	2.4	Reserve Numerator	0		
	2.5	Reserve Denominator			
	2.6	Reserve Ratio (2.4/2.5)			
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	•	
		butable from the Separate Accounts to the general account for use by the gene	rai account?	\$	
3.4	State	the authority under which Separate Accounts are maintained:			
3.5	Was a	any of the reporting entity's Separate Accounts business reinsured as of Decem	iber 31?	Yes [	] No [ X ]
3.6	Has th	ne reporting entity assumed by reinsurance any Separate Accounts business as	s of December 31?	Yes [	] No [ X ]
0.7	16 41				
3.7	Acco	reporting entity has assumed Separate Accounts business, how much, if any, re punts reserve expense allowances is included as a negative amount in the liabil ?"	ity for "Transfers to Separate Accounts due or accrued		
4.1	Are po by th	ersonnel or facilities of this reporting entity used by another entity or entities or a is reporting entity (except for activities such as administration of jointly underwri	itten group contracts and joint mortality or entities used		
		es)?		Yes [ X	] No [ ]
4.2	Not re	imbursement of such expenses between reporting entities:			
	Notic		4.21 Paid	\$	132.185
			4.22 Received		
<b>-</b> -	5				
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:			
	,00,		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 repor	rting entity:	\$	7 000 000
5.1				-Ψ	
7.	Total	dividends paid stockholders since organization of the reporting entity:			
			7.11 Cash		
			7.12 Stock	\$	0

8.1	Reinsurance (incluc benefits of the occ	reinsure any Workers' ling retrocessional reir upational illness and a s workers' compensati	isurance) assu	med by life and hea	alth insurers of med	dical, wage loss and o	death	Yes [	] No[X]
8.2	0,			ompensation Carve	e-Out Supplement	to the Annual Statem	ent?	Yes [	] No [ ]
8.3	If 8.1 is yes, the am	ounts of earned premi	ums and claim	s incurred in this st	atement are: 1	2	3		
					Reinsurance Assumed	Reinsurance Ceded	Net Retained		
	8.31 Earned prem	ium							
	-								
			,						
	8.35 Incurred clain	ns							
8.4			with attachme	ent points below \$1,	000,000, the distrik	oution of the amounts	reported in Lines 8.31 an	d	
	8.34 for Column (1	) are:				1	2		
			Attachment	t		Earned	Claim Liability		
			Point			Premium	and Reserve		
	8.41		<\$25,000	200					
	8.42 8.43	d	\$25,000 - 99,9 \$100,000 - 249						
	8.44		6100,000 - 249 6250,000 - 999	,					
	8.45		\$2,000,000 - 999 \$1,000,000 or r	,					
			.,,						
8.5	What portion of ear	ned premium reported	in 8.31, Colum	nn 1 was assumed i	from pools?			\$	
9.1	Does the company	have variable annuitie	s with guarante	ed benefits?				Yes [	] No [ X ]
9.2	If 9.1 is yes, comple	te the following table f	or each type o	f guaranteed benefi	it.				
	Туре		3	4	5	6	7	8	9
	1	2	Waiting						
	Guaranteed Death Benefit	Guaranteed Living Benefit	Period Remaining	Account Value Related to Col. 3	Total Related Account Values	Gross Amount of Reserve	Location of Reserve	Portion Reinsured	Reinsurance Reserve Credit
				<u>.</u>					
10.		s having sold annuities s the result of the purc				annuities has obtain	ed a release of liability fro	m the	
10.1	u , ,			• •	• • •			\$	
10.2	List the name and lo								
	1			1			2		
				I			2 Statement V	alue/	
							on Purchase		
			P&C Insuran	ce Company And L	ocation		of Annuiti (i.e., Present		
					000001		(1.6., 1 165611	value)	

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

		1	his exhibit in thous	3	4	5
		2009	2008	2007	2006	2005
	Life Insurance in Force					
	(Exhibit of Life Insurance)					
1.	Ordinary - whole life and endowment (Line 34, Col. 4)					
2.	Ordinary - term (Line 21, Col. 4, less Line 34, Col. 4)					
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)			10 700	10 701	
7.	Total (Line 21, Col. 10)			40 , 739	43,731	46,/24
	New Business Issued					
0	(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)					
10.	Premium Income - Lines of Business					
	(Exhibit 1 - Part 1)					
14.	Industrial life (Line 20.4, Col. 2)					
14.	Ordinary-life insurance (Line 20.4, Col. 3)	316 302	338 0/5	37/ 131	307 076	400 017
	Ordinary-individual annuities (Line 20.4, Col. 4)					
15.2	Credit life (group and individual) (Line 20.4, Col. 5)					
	Group life insurance (Line 20.4, Col. 6)					
	Group annuities (Line 20.4, Col. 7)					
	A & H-group (Line 20.4, Col. 8)					
	A & H-credit (group and individual) (Line 20.4, Col. 9)					
	A & H-other (Line 20.4, Col. 10)					
19.	Aggregate of all other lines of business (Line 20.4,Col. 11)					
20.	Total		338,945	374, 131	397.976	
	Balance Sheet (Pages 2 & 3)		,.	, , , , , , , , , , , , , , , , , , , ,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
21.	Total admitted assets excluding Separate Accounts business (Page 2, Line 24, Col. 3)					
22.	Total liabilities excluding Separate Accounts					
	business (Page 3, Line 26)		6,379,325			
23.	Aggregate life reserves (Page 3, Line 1)			6, 102, 752	5,702,163	6,352,512
24.	Aggregate A & H reserves (Page 3, Line 2)					
25.	Deposit-type contract funds (Page 3, Line 3)					63
26.	Asset valuation reserve (Page 3, Line 24.1)		······ , · · · ·	,	,	
27.	Capital (Page 3, Lines 29 and 30)					2,500,000
28.	Surplus (Page 3, Line 37)	7,743,586	8,485,201		7 ,722 ,568	7,314,931
	Cash Flow (Page 5)					
29.	Net Cash from Operations (Line 11)				439,626	
	Risk-Based Capital Analysis					
30.	Total adjusted capital			10,536,974		
31.	Authorized control level risk - based capital	115,373	103,055		95,420	132,460
	Equivalents and Invested Assets (Page 2, Col. 3) (Line No. /Page 2, Line 10, Col. 3)					
	x 100.0	00.4	00.0	01.0	00.0	00.0
32.	Bonds (Line 1)					
33.	Stocks (Lines 2.1 and 2.2)		2.9			3.0
34. 25	Mortgage loans on real estate(Lines 3.1 and 3.2)					
35. 26	Real estate (Lines 4.1, 4.2 and 4.3)					
36.	Cash, cash equivalents and short-term investments (Line 5)					8.5
37.	Contract loans (Line 6)					1.2
38.	Other invested assets (Line 7)					
39.	Receivables for securities (Line 8)	0.1	0.1	1.9	0.5	0.4
40.	Aggregate write-ins for invested assets (Line 9)					
41.	Cash, cash equivalents and invested assets					

# FIVE-YEAR HISTORICAL DATA

			inued)			
		1 2009	2 2008	3 2007	4 2006	5 2005
	Investments in Parent, Subsidiaries and Affiliates	2003	2000	2001	2000	2000
42.	Affiliated bonds (Schedule D Summary, Line 12, Col. 1)					
43.	Affiliated preferred stocks (Schedule D Summary, Line 18, Col. 1)					
44.	Affiliated common stocks (Schedule D Summary Line 24, Col. 1),					
45.	Affiliated short-term investments (subtotal included in Schedule DA Verification, Col. 5, Line 10)					
46.	Affiliated mortgage loans on real estate					
47.	All other affiliated					
48.	Total of above Lines 42 to 47					
	Total Nonadmitted and Admitted Assets					
49.	Total nonadmitted assets (Page 2, Line 26, Col. 2).					
50.	Total admitted assets (Page 2, Line 26, Col. 3)					
	Investment Data					
51.	Net investment income (Exhibit of Net Investment Income)					
52.	Realized capital gains (losses)					
53.	Unrealized capital gains (losses)	,	· · · · ,	,	,	
54.	Total of above Lines 51, 52 and 53	822 155	859 343		879 739	851 2
J	Benefits and Reserve Increases (Page 6)					
55.	Total contract benefits - life (Lines 10, 11, 12, 13, 14 and 15 Col 1 minus Lines 10, 11, 12, 13, 14 and					
56.	15 Cols. 9, 10 and 11) Total contract benefits - A & H (Lines 13 & 14, Cols.					
57.	Increase in life reserves - other than group and					
58.	annuities (Line 19, Cols. 2 and 3) Increase in A & H reserves (Line 19, Cols. 9, 10 &			51,425	(650,350)	1,353,5
59.	11) Dividends to policyholders (Line 30, Col. 1)					
60.	Operating Percentages Insurance expense percent (Page 6, Col. 1, Lines					
00.	21, 22 & 23, less Line 6)/(Page 6, Col. 1, Line 1 plus Exhibit 7, Col. 2, Line 2) x 100.0		61.4			
61.	Lapse percent (ordinary only) [(Exhibit of Life Insurance, Col. 4, Lines 14 & 15) / 1/2 (Exhibit of Life Insurance, Col. 4, Lines 1 & 21)] x 100.0	4.3				Ę
62.	A & H loss percent (Schedule H, Part 1, Lines 5 and 6, Col. 2)					
63.	A & H cost containment percent (Schedule H, Pt. 1, Line 4, Col. 2)					
64.	A & H expense percent excluding cost conatinment					
	A & H Claim Reserve Adequacy					
65.	Incurred losses on prior years' claims - group health (Schedule H, Part 3, Line 3.1 Col. 2)					
66.	Prior years' claim liability and reserve - group health (Schedule H, Part 3, Line 3.2 Col. 2)					
67.	Incurred losses on prior years' claims-health other than group (Schedule H, Part 3, Line 3.1 Col. 1 less Col. 2)					
68.	Prior years' claim liability and reserve-health other than Group (Schedule H, Part 3, Line 3.2 Col. 1					
	less Col. 2) Net Gains From Operations After Federal Income Taxes by Lines of Business (Page 6, Line 33)					
69.	Industrial life (Col. 2)					
70.	Ordinary - life (Col. 3)				1, 112,074	
71.	Ordinary - individual annuities (Col. 4)					
72.	Ordinary-supplementary contracts (Col. 5)					
73.	Credit life (Col. 6)					
74.	Group life (Col. 7)					
75.	Group annuities (Col. 8)					
-						
76. 77	A & H-group (Col. 9)					
77.	A & H-credit (Col. 10)					
78.	A & H-other (Col. 11)					
79.	Aggregate of all other lines of business (Col. 12)			151.100		/
80.	Total (Col. 1)	242.043	470,633	454,188	1,112,074	(932,0

If no, please explain: ...



DIRECT BUSINESS IN THE STATE OF Grand Total

DURING THE YEAR 2009 

NAIC Group Code 1129		LI	FE INSURANCE		NAIC Company Code 90581		
		1	2 Credit Life (Group	3	4	5	
	AND ANNUITY CONSIDERATIONS	Ordinary	and Individual)	Group	Industrial	Total	
1.							
2.	Annuity considerations					,	
3.	Deposit-type contract funds		XXX		XXX		
4.							
5.	Totals (Sum of Lines 1 to 4)	315,100				315.100	
	DIRECT DIVIDENDS TO POLICYHOLDERS	,				,	
Life ir	isurance:						
6.1	Paid in cash or left on deposit						
6.2							
6.3	Applied to provide paid-up additions or shorten the endowment or premium-paying period						
6.4	Other						
6.5	Totals (Sum of Lines 6.1 to 6.4)						
Annu	ities:						
7.1	Paid in cash or left on deposit						
7.2	Applied to provide paid-up annuities						
7.3	Other						
7.4	Totals (Sum of Lines 7.1 to 7.3)						
8.	Grand Totals (Lines 6.5 plus 7.4)						
	DIRECT CLAIMS AND BENEFITS PAID						
9.	Death benefits						
10.	Matured endowments					, , ,	
11.	Annuity benefits						
12.							
	Aggregate write-ins for miscellaneous direct claims and benefits paid					·	
14.	All other benefits, except accident and health						
15.	Totals	257,109				257,109	
	DETAILS OF WRITE-INS						
1301							
1302							
1303							
1398.	Summary of Line 13 from overflow page						
	. Totals (Lines 1301 thru 1303 plus 1398) (Line 13 above)						

	C	ordinary		redit Life and Individual)		Group		ndustrial		Total
DIRECT DEATH BENEFITS AND MATURED	1	2	3 No. of Ind.Pols.	4	5	6	7	8	9	10
ENDOWMENTS INCURRED	No.	Amount	& Gr. Certifs.	Amount	No. of Certifs.	Amount	No.	Amount	No.	Amount
16. Unpaid December 31, prior year										
17. Incurred during current year		157,573							11	157,573
Settled during current year: 18.1 By payment in full	11								11	
18.2 By payment on compromised claims										
compromised claims	11									
18.4 Reduction by compromise 18.5 Amount rejected										
18.6 Total settlements	11								11	
19. Unpaid Dec. 31, current year (16+17-18.6)										
POLICY EXHIBIT					No. of Policies					
20. In force December 31, prior year	2.575	38.062.840		(a)					2.575	
21. Issued during year				,,						
22. Other changes to in force (Net)	(113)	(2,145,822)							(113)	(2, 145, 822)
23. In force December 31 of current year	2,462	35,917,018		a)					2,462	35,917,018

#### ACCIDENT AND HEALTH INSURANCE

		ACCIDENT AND	ILALIII MOOI	ANCL		
		1	2	3	4	5
				Dividends Paid Or		
			Direct Premiums	Credited On Direct		Direct Losses
		Direct Premiums	Earned	Business	Direct Losses Paid	Incurred
	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)					
	Non-renewable for stated reasons only (b)					
25.4	Other accident only					
	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)					
(1.)			880 I		0 1 1	

insured under indemnity only products  $\hfill \hfill \hfi$ 

## EXHIBIT OF LIFE INSURANCE

-		Indu	Istrial	Ord	linary	Credit Life (Group and Individual) Group					10
		1	2	3	4	5	6	Nur	mber of	9	
		Number of Policies	Amount of Insurance (a)	Number of Policies	Amount of Insurance (a)	Number of Individual Policies and Group Certificates	Amount of Insurance (a)	7 Policies	8 Certificates	Amount of Insurance (a)	Total Amount of Insurance (a)
1. In force end	d of prior vear		, incant of incarance (a)			Contineated		1 0110100	Continioateo		
<ol> <li>Issued duri</li> </ol>				,010					-		
	ce assumed								-		
4. Revived du				3					-		
	during year (net)								-		
	Lines 2 to 5	••••••		3							65
	by dividends during year	XXX				XXX		XXX	XXX		
8. Aggregate	write-ins for increases		-								
	es 1 and 6 to 8)			2,578							
	s during year:										
10. Death	s duning year.			11				XXX			
							••••				
				28	808						
	٦			20				XXX	XXX	XXX	
	l (net)										
18. Reinsurand											
	ce write-ins for decreases										
				110	0.011						0.011
	nes 10 to 19)										
	d of year, (Line 9 minus Line 20)								· ·····		
	ce ceded end of year	XXX		XXX		XXX		XXX	XXX		05.040
23. Line 21 mir		XXX		XXX	35,918	XXX	(b)	XXX	XXX		35,918
	OF WRITE-INS										
							++-				
0803.	of remaining write-ins for Line 8 from overflow										
0898. Summary o page	of remaining write-ins for Line 8 from overflow										
0899. TOTALS (L	Lines 0801 thru 0803 plus 0898) (Line 8	,							-		
above)											
1901.											
1903.											
1998. Summary of	of remaining write-ins for Line 19 from overflow										
page.											
	Lines 1901 thru 1903 plus 1998) (Line 19										
above)	nsurance in this exhibit shall be shown in thousa	L ( 11 000)							1		

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

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

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

		Indu	strial	Ordinary				
		1	2	3	4			
			Amount of Insurance		Amount of Insurance			
		Number of Policies	(a)	Number of Policies	(a)			
24.	Additions by dividends	XXX		XXX				
25.	Other paid-up insurance							
26.	Debit ordinary insurance	XXX	XXX					

#### ADDITIONAL INFORMATION ON ORDINARY INSURANCE

		Issued During Year (Included in Line 2)		In Force End of Year (Included in Line 21)		
		1	2	3	4	
			Amount of Insurance		Amount of Insurance	
	Term Insurance Excluding Extended Term Insurance	Number of Policies	(a)	Number of Policies	(a)	
27.	Term policies - decreasing					
28.	Term policies - other					
29.	Other term insurance - decreasing			XXX		
30.	Other term insurance	XXX		XXX	50	
31.	Totals, Lines 27 to 30					
	Reconciliation to Lines 2 and 21:					
32.	Term additions	XXX		XXX		
33.	Totals, extended term insurance		XXX			
34.	Totals, whole life and endowment	-		1,552	20,218	
35.	Totals (Lines 31 to 34)			2,462	35,918	

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

		Issued Du (Included	ıring Year in Line 2)	In Force End of Year (Included in Line 21)		
		1	1 2		4	
		Non-Participating	Participating	Non-Participating	Participating	
36	Industrial					
37.	Ordinary					
38.	Credit Life (Group and Individual)					
39.	Group					
40.	Totals (Lines 36 to 39)			35,918		

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

					Credit Life		Gro	oup
				um	1 be Individu	2	3	4
				Nio	cie a d Grou	A nount of Insurance		Amount of Insurance
					Ce ific es	(2)	Number of Certificates	(a)
41.	Amount of insurance included in Line 2 ceded to	her comp	nies		KXX		XXX	
42.	Number in force end of year if the number under on a pro-rata basis	ared gi	s is unted					xxx
43.	Federal Employees' Group Life Insurance include	d in Line 21						
44.	Servicemen's Group Life Insurance included in Li	ne 21						
45.	Group Permanent Insurance included in Line 21							



	BASI OF CAL	:UL/	IONC	ORI	ARY T	RМ	NSURANCE
	f (47.1) decreasing tern in vranc amily, Parent and Children, 15., p		ined in Fam and riders in		m Mort I abure.	g ge F	ptection, etc., policies and riders and of (47.2) term insurance on
47.1				<u> </u>			

#### POLICIES WITH DISABILITY PROVISIONS

	Industrial			Ordinary		Credit	Group	
	1	2	3	4	5	6	7	8
							Number of	
	Number of	Amount of Insurance	Number of	Amount of Insurance	Number of	Amount of Insurance	Certifi-	Amount of Insurance
Disability Provisions	Policies	(a)	Policies	(a)	Policies	(a)	cates	(a)
Waiver of Premium								
			XXX	XXX				
Total		(b)	551	(b) 13,965		(b)		(b)
	Disability Provisions Waiver of Premium Disability Income Extended Benefits Other	Disability Provisions Policies Waiver of Premium Disability Income Extended Benefits Other	1     2       Number of Policies     Amount of Insurance Policies       Waiver of Premium	1     2     3       Disability Provisions     Number of Policies     Amount of Insurance (a)     Number of Policies       Waiver of Premium	1     2     3     4       Disability Provisions     Number of Policies     Amount of Insurance (a)     Number of Policies     Amount of Insurance (a)       Waiver of Premium	1     2     3     4     5       Disability Provisions     Number of Policies     Amount of Insurance (a)     Number of Policies     Amount of Insurance (a)     Number of Policies       Waiver of Premium	1     2     3     4     5     6       Number of Policies     Amount of Insurance (a)     Number of Policies     Amount of Insurance Policies     Number of Policies     Amount of Insurance Policies     Number of Policies     Amount of Insurance Policies     Amount of Insurance Policies	1     2     3     4     5     6     7       Number of Disability Provisions     Number of Policies     Amount of Insurance (a)     Number of Policies       Waiver of Premium     551     551     13,965

(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 2009 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	71,203
2.	Current year's realized pre-tax capital gains/(losses) of \$	1, 113
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)	72,316
5.	Current year's amortization released to Summary of Operations (Amortization, Line 1, Column 4)	5,578
6.	Reserve as of December 31, current year (Line 4 minus Line 5)	66,738

AMORTIZATION										
		1	2	3	4					
	Year of Amortization	Reserve as of December 31, Prior Year	Current Year's Realized Capital Gains/(Losses) Transferred into the Reserve Net of Taxes	Adjustment for Current Year's Liability Gains/(Losses) Released From the Reserve	Balance Before Reduction for Current Year's Amortization (Cols. 1 + 2 + 3)					
1.	2009									
2.	2010				4,207					
3.	2011									
4.	2012				3,566					
5.	2013									
6.	2014	4,943	45		4,988					
7.	2015									
8.	2016									
9.	2017	6,540			6,540					
10.	2018									
11.	2019				6,690					
12.	2020				5,676					
13.	2021	4,361			4,361					
14.	2022				2,912					
15.	2023									
16.	2024									
17.	2025									
18.	2026									
19.	2027									
20.	2028									
21.	2029									
22.	2030									
23.	2031									
24.	2032									
25.	2033									
26.	2034									
27.	2035									
28.	2036									
29.	2037									
30.	2038									
31.	2039 and Later									
32.	Total (Lines 1 to 31)	71,203	1,113		72,316					

## **ASSET VALUATION RESERVE**

	Default Component			Equity Component		
	1 2	3	4	5 Real Estate and	6	7
	Other Than Mortgage Loans Mortgage Loans	Total (Cols. 1 + 2)	Common Stock	Other Invested Assets	Total (Cols. 4 + 5)	Total Amount (Cols. 3 + 6)
1. Reserve as of December 31, prior year		40,096				40,096
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	13,077	13,077				13,077
8. Accumulated balances (Lines 1 through 5 - 6 + 7)						
9. Maximum reserve						
10. Reserve objective		39,759				39,759
11. 20% of (Line 10 - Line 8)		(2,683)				(2,683)
12. Balance before transfers (Lines 8 + 11)		50,490				
13. Transfers						xxx
14. Voluntary contribution						
15. Adjustment down to maximum/up to zero						
16. Reserve as of December 31, current year (Lines 12 + 13 + 14 + 15)	50,490	50,490				50,490

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

			1	2	3	4	Basic C	Contribution	Reserve	e Objective	Maximur	m Reserve
							5	6	7	8	9	10
Line	NAIO		De als (A alissanta al	Reclassify	A del Third Deuter	Balance for AVR						<b>.</b> .
Num- ber	NAIC Designation	Description	Book/Adjusted Carrying Value	Related Party Encumbrances	Add Third Party Encumbrances	Reserve Calculations (Cols. 1 + 2 + 3)	Factor	Amount (Cols.4 x 5)	Factor	Amount (Cols, 4 x 7)	Factor	Amount (Cols. 4 x 9)
Dei	Designation	LONG-TERM BONDS	Carrying value	LIICUIIDI allees	LIICUIIDI diiCes	(COIS. 1 + 2 + 3)	Factor	(COIS.4 X 5)	Factor	(COIS. 4 X 7)	Factor	(COIS. 4 X 9)
1.		EXEMPT Obligations	9,078,230	XXX	XXX	9,078,230	0.0000		0.0000		0.0000	
1.	1	Highest Quality	4,836,588			4,836,588	0.0000	1.935	0.0000		0.0030	14.510
2.	2	High Quality			XXX						0.0090	
3.	2	Medium Quality			XXX		0.0093	4.646	0.0230		0.0340	
4.	3	Low Quality			XXX		0.0213		0.0530		0.0340	
э. с	4 5	Low Quality	••••		XXX		0.0213					
0. 7	5 6	In or Near Default			XXX XXX		0.0000		0.2000		0.2000	
7.	0						0.0000		0.2000		0.2000	
8.		Total Unrated Multi-class Securities Acquired by Conversion		XXX	XXX		XXX		XXX		XXX	
9.		Total Bonds (Sum of Lines 1 through 8) (Page 2, Line 1,		7000	7000		7001		7000		7001	
0.		Net Admitted Asset)	15,393,063	XXX	XXX	15,393,063	XXX	8,440	XXX	28,290	XXX	40,302
		PREFERRED STOCK	, , , , , , , , , , , , , , , , , , ,					, i i i i i i i i i i i i i i i i i i i		, i i i i i i i i i i i i i i i i i i i		,
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	498,650	XXX	XXX	498,650	0.0093	4,637			0.0340	.16,954
13.	4	Low Quality		XXX	XXX		0.0213	·	0.0530	·	0.0750	, 
14.	5	Lower Quality		XXX	XXX		0.0432		0.1100			
15.	6	In or Near Default		XXX	XXX						0.2000	
16.		Affiliated Life with AVR		XXX	XXX		0.0000		0.0000		0.0000	
17.		Total Preferred Stocks (Sum of Lines 10 through 16)										
		(Page 2, Line 2.1, Net Admitted Asset)	498,650	XXX	XXX	498,650	XXX	4,637	XXX	11,469	XXX	16,954
		SHORT - TERM BONDS										
18.		Exempt Obligations		XXX	XXX				0.0000			
19.	1	Highest Quality		XXX	XXX		0.0004		0.0023			
20.	2	High Quality		XXX	XXX		0.0019		0.0058			
21.	3	Medium Quality		XXX	XXX		0.0093		0.0230		0.0340	
22.	4	Low Quality		XXX	XXX				0.0530			
23.	5	Lower Quality		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)	369,696	XXX	XXX	369,696	XXX		XXX		XXX	

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

			1	2	3	4	Basic C	ontribution	Reserve	e Objective	Maximu	m Reserve
							5	6	7	8	9	10
Line				Reclassify		Balance for AVR						
Num- ber	NAIC Designation	Description	Book/Adjusted Carrying Value	Related Party Encumbrances	Add Third Party Encumbrances	Reserve Calculations	E t - v	Amount	Fastan	Amount	E t - u	Amount
ber	Designation		Carrying value	Encumbrances	Encumbrances	(Cols. 1 + 2 + 3)	Factor	(Cols.4 x 5)	Factor	(Cols. 4 x 7)	Factor	(Cols. 4 x 9)
		DERIVATIVE INSTRUMENTS		1004	1004		0.0004		0.0000		0.0000	
26.		Exchange Traded		XXX	XXX		0.0004		0.0023		0.0030	
27.	1	Highest Quality		XXX	XXX		0.0004				0.0030	
28.	2	High Quality		XXX	XXX		0.0019		0.0058		0.0090	
29.	3	Medium Quality		XXX	XXX		0.0093		0.0230		0.0340	
30.	4	Low Quality		XXX	XXX		0.0213		0.0530		0.0750	
31.	5	Lower Quality		XXX	XXX		0.0432		0.1100		0.1700	
32.	6	In or Near Default		XXX	XXX		0.0000		0.2000		0.2000	
33.		Total Derivative Instruments		XXX	XXX		XXX		XXX		XXX	
34.		Total (Lines 9 + 17 + 25 + 33)	16,261,409	XXX	XXX	16,261,409	XXX	13,077	XXX	39,759	XXX	57,256
		MORTGAGE LOANS										
		In Good Standing:										
35.		Farm Mortgages			XXX		0.0063 (a)		0.0120 (a)		0.0190 (a)	
36.		Residential Mortgages - Insured or Guaranteed										
37.		Residential Mortgages - All Other			XXX		0.0013				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					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			////		0.0000		0.1700		0.1700	
_		50) (Page 2, Line 3, Net Admitted Asset)			XXX		XXX		XXX		xxx	
52.		Schedule DA Mortgages			XXX		(C)		(c)		(C)	
53.		Total Mortgage Loans on Real Estate (Line 51 + 52)			XXX		XXX		XXX		XXX	

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

(b) Column 9 is the greater of 6.4% without any EAF adjustments or a company's EAF adjusted In Good Standing (IGS) factor plus 150 basis points. Columns 5 and 7 are 28% and 62% respectively of Column 9. (c) Determined using the same factors and breakdowns used for directly owned mortgage loans. Asset Valuation Reserve - Equity Component

Asset Valuation Reserve Replications (Synthetic) Assets N O N E

Schedule F - Claims

Schedule H - Part 1 - Analysis of Underwriting Operations N O N E

Schedule H - Part 2 - Reserves and Liabilities NONE

Schedule H - Part 3 - Prior Year's Claim Reserves and Liabilities NONE

Schedule H - Part 4 - Reinsurance

Schedule H - Part 5 - Health Claims NONE

Schedule S - Part 1 - Section 1 NONE

Schedule S - Part 1 - Section 2 NONE

> Schedule S - Part 2 NONE

Schedule S - Part 3 - Section 1 NONE

Schedule S - Part 3 - Section 2 NONE

Schedule S - Part 4

Schedule S - Part 5

32,33,34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46

## **SCHEDULE S - PART 6**

	Restatement of Balance Sheet to Identify Net C	1 As Reported (net of ceded)	2 Restatement Adjustments	3 Restated (gross of ceded)
	ASSETS (Page 2, Col. 3)			
1.	Cash and invested assets (Line 10)			16,480,921
2.	Reinsurance (Line 14)			
3.	Premiums and considerations (Line 13)			
4.	Net credit for ceded reinsurance			
5.	All other admitted assets (balance)	249,093		249,093
6.	Total assets excluding Separate Accounts (Line 24)			
7.	Separate Account assets (Line 25)			
8.	Total assets (Line 26)	16,784,114		16,784,114
	LIABILITIES, CAPITAL AND SURPLUS (Page 3)			
9.	Contract reserves (Lines 1 and 2)			6,339,708
10.	Liability for deposit-type contracts (Line 3)			
11.	Claim reserves (Line 4)			
12.	Policyholder dividends/reserves (Lines 5 through 7)			
13.	Premium & annuity considerations received in advance (Line 8)			
14.	Other contract liabilities (Line 9)			
15.	Reinsurance in unauthorized companies (Line 24.2)			
16.	Funds held under reinsurance treaties with unauthorized reinsurers (Line 24.3)			
17.	All other liabilities (balance)			129, 101
18.	Total liabilities excluding Separate Accounts (Line 26)			
19.	Separate Account liabilities (Line 27)			
20.	Total liabilities (Line 28)			
21.	Capital & surplus (Line 38)		XXX	10,243,586
22.	Total liabilities, capital & surplus (Line 39)	16,784,114		16,784,114
	NET CREDIT FOR CEDED REINSURANCE			
23.	Contract reserves			
24.	Claim reserves			
25.	Policyholder dividends/reserves			
26.	Premium & annuity considerations received in advance			
27.	Liability for deposit-type contracts			
28.	Other contract liabilities			
29.	Reinsurance ceded assets			
30.	Other ceded reinsurance recoverables			
31.	Total ceded reinsurance recoverables			
32.	Premiums and considerations			
33.	Reinsurance in unauthorized companies			
34.	Funds held under reinsurance treaties with unauthorized reinsurers			
35.	Other ceded reinsurance payables/offsets			
35. 36.	Total ceded reinsurance payable/offsets			
00.	Total net credit for ceded reinsurance			

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

			Al	located by State	es and Territorie				
			1	Life Co	ntracts	Direct Bus 4	iness Only 5	6	7
				2	3	Accident and Health Insurance Premiums, Including Policy,	J	Total	,
	States, Etc.		Active Status	Life Insurance Premiums	Annuity Considerations	Membership and Other Fees	Other Considerations	Columns 2 through 5	Deposit-Type Contracts
1.	Alabama	- AL	L					11,656	
2.	Alaska	- AK	N						
3. 4.	Arizona Arkansas	- AZ - AR	L.	1,811 1,207				1,811 1,207	
4. 5.	California	- AR - CA	EE						
6.	Colorado	- CO	E						
7.	Connecticut	- CT	L	6,892				6,892	
8.	Delaware	DE	k						
9. 10.	District of Columbia Florida	- DC FL	L.						
11.	Georgia	- FL - GA	E						
12.	Hawaii	- HI	N.						
13.	Idaho	- ID	L	6,538				6,538	
14. 15.	Illinois Indiana	IL	L						
15. 16.	lowa	- IN - IA	LN	4,174 2.325				4,174 2.325	
17.	Kansas	- IA - KS	L						
18.	Kentucky	- KY	L					2,836	
19.	Louisiana	- LA	L	6,054				6,054	
20.	Maine	- ME	N.						
21. 22.	Maryland		L	7,504 .96				7,504 .96	
22.	Michigan	- MA - MI	N						
24.	Minnesota	- MN	L						
25.	Mississippi	- MS	L	6,582				6,582	
26.	Missouri	- MO	L						
27.	Montana	MT							
28. 29.	Nebraska Nevada	- NE - NV	L						
30.	New Hampshire	- NH	∟ N						
31.	New Jersey		N						
32.	New Mexico	- NM	L	3, 163				3, 163	
33.	New York	- NY	N						
34. 25	North Carolina		Ļ	6,453				6,453	
35. 36.	North Dakota Ohio	ND OH	L	4,521				4.521	
37.	Oklahoma	- OH - OK	L	4,521				4,521	
38.	Oregon	- OK	F						
39.	Pennsylvania	PA	L						
40.	Rhode Island	- RI	N.						
41.	South Carolina	- SC	Ļ	2,885				2,885	
42. 43.	South Dakota	- SD - TN	L						
43. 44.	Texas		E 						
45.	Utah		L						
46.	Vermont		N.						
47.	Virginia		L						
48. 40	Washington		L						
49. 50.	West Virginia Wisconsin		k						
50. 51.	Wyoming		LN	4,494 1,280				4,494 1,280	
52.	American Samoa		N	1,200				1,200	
53.	Guam	- GU	N.						
54.	Puerto Rico		N.						
55.	U.S. Virgin Islands		N						
56. 57.	Northern Mariana Islands Canada		NN	225	<u> </u>				
57. 58.	Aggregate Other Aliens		N						
59.	Subtotal		(a)40						
90.	Reporting entity contributions for employee b	enefits							
91.	plans. Dividends or refunds applied to purchase pai		XXX						
51.	additions and annuities		xxx						
92.	Dividends or refunds applied to shorten endo	wment	t						
93.	or premium paying period Premium or annuity considerations waived ur		XXX						
	disability or other contract provisions			8,168				8 , 168	
94.	Aggregate or other amounts not allocable by								
95. 96	Totals (Direct Business)		XXX						
96. 97	Plus reinsurance assumed Totals (All Business)								
97 98.	Less reinsurance ceded			ఎ८ఎ , 20ర				ఎ८ఎ, ८०४	
99.	Totals (All Business) less Reinsurance Cede		XXX	323,268		(b)		323,268	
	DETAILS OF WRITE-INS			,		. /		,	
5801.			XXX						
5802. 5803			XXX						
5803. 5898.	Summary of remaining write-ins for Line 58 fu	rom	XXX						
5898. 5899.	overflow page Totals (Lines 5801 through 5803 plus 5898)(I								
9401.	58 above)		XXX XXX						
9401. 9402.			XXX			+		[	
9403.			XXX						
9498.	Summary of remaining write-ins for Line 94 fi	rom							
9499.	overflow page Totals (Lines 9401 through 9403 plus 9498)(I	Line	XXX		L				
5 100.	94 above)		XXX						
		action		cation by states, e				•	

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

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

#### SCHEDULE T - PART 2

#### **INTERSTATE COMPACT - EXHIBIT OF PREMIUMS WRITTEN**

Allocated by States and Territories

			Allocated by States and Territories Direct Business Only						
			1 Life	2 Annuities	3 Disability Income	4 Long-Term Care	5	6	
	States, Etc.		(Group and Individual)	(Group and Individual)	(Group and Individual)	(Group and Individual)	Deposit-Type Contracts	Totals	
1.	Alabama	AL							
2.	Alaska	AK							
3.	Arizona	AZ	1,811					1,811	
4.	Arkansas	AR	1,207					1,207	
5.	California	CA							
6.	Colorado	СО	2,799						
7.	Connecticut	СТ	6,892						
8.	Delaware	DE							
9.	District of Columbia	DC							
10.	Florida	FL							
11.	Georgia	GA	14,599						
12.	Hawaii	HI							
13.	Idaho	ID	6,538						
14.	Illinois	IL							
15.	Indiana	IN	4, 174					4, 174	
16.	lowa	IA	2,325						
17.	Kansas	KS	5,653						
18.	Kentucky	KY	2,836						
19.	Louisiana	LA	6,054						
20.	Maine	ME	10						
21.	Maryland	MD	7,504					7,504	
22.	Massachusetts	MA	96						
23.	Michigan	MI	1,058						
24.	Minnesota	MN							
25.	Mississippi	MS	6,582						
26.	Missouri	МО							
27.	Montana	MT							
28.	Nebraska	NE							
29.	Nevada	NV							
30.	New Hampshire	NH							
31.	New Jersey	NJ							
32.	New Mexico	NM	3, 163						
33.	New York	NY							
34.	North Carolina	NC	6,453						
35.	North Dakota	ND							
36.	Ohio	ОН	4,521					4,521	
37.	Oklahoma	ОК	1,799						
38.	Oregon	OR							
39.	Pennsylvania	PA							
40.	Rhode Island								
41.	South Carolina	SC	2,885						
42.	South Dakota	SD							
43.	Tennessee	TN							
44.	Texas	тх							
45.	Utah	UT							
46.	Vermont	VT							
47.	Virginia		8,332						
48.	Washington								
49.	West Virginia	wv							
50.	Wisconsin		4,494					4,494	
51.	Wyoming		1,280				[		
52.	American Samoa								
53.		GU					[		
54.	Puerto Rico								
55.	U.S. Virgin Islands								
56.	Northern Mariana Islands								
57.	Canada								
58.	Aggregate Other Alien	-							
59.	Total		315,100				[	315,100	
			0.0,100			1	ı	010,100	

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

## **PART 1 - ORGANIZATIONAL CHART**

Name	FEI #	NAIC #	Domicile	Ownership
Symetra Financial Corporation	20-0978027		DE	18.8% White Mountains Insurance
				18.8% Berkshire Hathaway, Inc.,
				11.7% Franklin Mutual Advisors, LLC
				50.7% Other Equity Investors **
Symetra Life Insurance Company	91-0742147	68608	WA	100% Symetra Financial Corporation
Symetra National Life Insurance Company	91-1079693	90581	WA	100% Symetra Life Insurance Comp
First Symetra National Life Insurance Company of New York	91-1367496	78417	NY	100% Symetra Life Insurance Comp
Symetra Assigned Benefits Service Company	91-1246870		WA	100% Symetra Financial Corporation
Symetra Administrative Services, Inc.	91-1364981		WA	100% Symetra Financial Corporation
Symetra Securities, Inc.	91-0824835		WA	100% Symetra Financial Corporation
Symetra Services Corporation	91-0887019		WA	100% Symetra Financial Corporation
Symetra Investment Services, Inc.	91-1354455		WA	100% Symetra Financial Corporation
TFS Training & Consulting, Inc.	20-3494693		WA	100% Symetra Financial Corporation
Clearscape Funding Corporation	20-3820455		WA	100% Symetra Financial Corporation
WSF Receivables I, LLC	26-1099574		FL	100% Clearscape Funding Corporati
Health Network Strategies, LLC	20-8947838		DE	60% Symetra Financial Corporation
				40% Other Members
Medical Risk Managers, Inc.	51-0309072		DE	100% Symetra Financial Corporation
TIF Invest III, LLC	26-3530060		DE	100% Symetra Financial Corporation

\* Controlling Entity

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

All named entities are corporations

ce Group, Ltd.,\* LLC, ion npany npany ion ion ion ion ion ion ion ation on ion ion

## 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
						Income/						
						(Disbursements)						
					Purchases, Sales	Incurred in		. ,				Reinsurance
					or Exchanges of Loans, Securities,	Connection with Guarantees or		Income/ (Disbursements)		Any Other Material Activity Not in the		Recoverable/
NAIC					Real Estate.	Undertakings for	Management	(Disbursements)		Ordinary Course of		(Payable) on Losses and/or
Company	Federal ID	Names of Insurers and Parent.	Shareholder	Capital	Mortgage Loans or	the Benefit of any	Agreements and	Reinsurance		the Insurer's		Reserve Credit
Code	Number	Subsidiaries or Affiliates	Dividends	Contributions	Other Investments	Affiliate(s)	Service Contracts	Agreements	*	Business	Totals	Taken/(Liability)
	20-0978027	Symetra Financial Corporation		(102,068,265)							(102,068,265)	
		Symetra life Insurance Company	1,000,000									
		Symetra National Life Insurance Company	(1,000,000)	· · ·							(1,000,000)	
		First Symetra National Life Insurance										
		Company of New York										
	91-1246870	Symetra Assigned Benefits Service Company										
		Symetra Administative Services, Inc										
	91-0824835	Symetra Securities, Inc.										
	91-0887019	Symetra Services Corporation										
	91-1354455	Symetra Investment Services, Inc.										
	20-3494693	TFS Training & Consulting, Inc.										
	20-3820455	Clearscape Funding Corporation										
	26-1099574	WSF Receivables I, LLC										
	20-8947838	Health Network Strategies, LLC										
		Medical Risk Managers, Inc										
	26-3530060	TIF Invest III, LLC										
9999999 Con	ntrol Totals								XXX			

## SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

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

		Responses
	MARCH FILING	
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
	APRIL FILING	
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? JUNE FILING	YES
9.	Will an audited financial report be filed by June 1?	YES
10.	Will Accountant's Letter of Qualifications be filed with the state of domicile and electronically with the NAIC by June 1?	YES

The following supplemental reports are required to be filed as part of your annual statement filing. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

11.	MARCH FILING Will Schedule SIS (Stockholder Information Supplement) be filed with the state of domicile by March 1?	NO
12.	Will the Medicare Supplement Insurance Experience Exhibit be filed with the state of domicile and the NAIC by March 1?	NO
13.	Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC by March 1?	NO
14.	Will the actuarial opinion on participating and non-participating policies as required in Interrogatories 1 and 2 to Exhibit 5 be filed by March 1?	NO
15.	Will the actuarial opinion on non-guaranteed elements as required in interrogatory #3 to Exhibit 5 be filed by March 1?	YES
16.	Will the actuarial opinion on X-Factors be filed with the state of domicile and electronically with the NAIC by March 1?	NO
17.	Will the actuarial opinion on Separate Accounts Funding Guaranteed Minimum Benefit be filed with the state of domicile and electronically with the NAIC by March 1?	NO
18.	Will the actuarial opinion on Synthetic Guaranteed Investment Contracts be filed with the state of domicile and electronically with the NAIC by March 1?	NO
19.	Will the Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC by March 1?	NO
20.	Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC by March 1?	NO
21.	Will the Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI be filed with the state of domicile and electronically with the NAIC by March 1?	NO
22.	Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value) be filed with the state of domicile and electronically with the NAIC by March 1?	NO
23.	Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) be filed with the state of domicile and electronically with the NAIC by March 1?	NO
24.	Will the C-3 RBC Certifications required under C-3 Phase I be filed with the state of domicile and electronically with the NAIC by March 1?	NO
25.	Will the C-3 RBC Certifications required under C-3 Phase II be filed with the state of domicile and electronically with the NAIC by March 1?	NO
26.	Will the Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities be filed with the state of domicile and electronically with the NAIC by March 1?	NO

## SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

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

 12.

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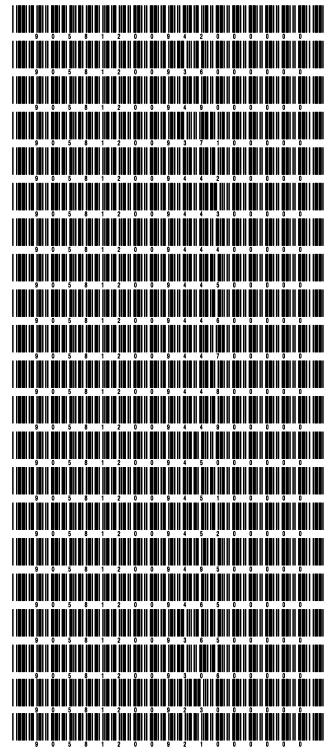
Bar Codes:

12. Medicare Supplement Insurance Experience Exhibit [Document Identifier 360]

SIS Stockholder Information Supplement [Document Identifier 420]

13. Trusteed Surplus Statement [Document Identifier 490]

- 14. Participating Opinion for Exhibit 5 [Document Identifier 371]
- 16. Actuarial Opinion on X-Factors [Document Identifier 442]
- 17. Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit [Document Identifier 443]
- Actuarial Opinion on Synthetic Guaranteed Investment Contracts [Document Identifier 444]
- Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 445]
- Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 446]
- Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI [Document Identifier 447]
- 22. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI [Document Identifier 448]
- Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) [Document Identifier 449]
- 24. C-3 RBC Certifications Required Under C-3 Phase I [Document Identifier 450]
- 25. C-3 RBC Certifications Required Under C-3 Phase II [Document Identifier 451]
- Actuarial Certifications Related to Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities [Document Identifier 452]
- 27. Workers' Compensation Carve-Out Supplement [Document Identifier 495]
- 28. Supplemental Schedule O [Document Identifier 465]
- 29. Medicare Part D Coverage Supplement [Document Identifier 365]
- 30. Long-Term Care Experience Reporting Forms [Document Identifier 306]
- 32. Credit Insurance Experience Exhibit [Document Identifier 230]
- 33. Accident and Health Policy Experience Exhibit [Document Identifier 210]



#### ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra National Life Insurance Company OVERFLOW PAGE FOR WRITE-INS

Additional Write-ins for Assets Line 9			
0997. Summary of remaining write-ins for Line 9 from overflow page			
			•
Additional Write-ins for Assets Line 23			
2397. Summary of remaining write-ins for Line 23 from overflow page			
Additional Write-ins for Liabilities Line 25			
2597. Summary of remaining write-ins for Line 25 from overflow page			
Additional Write-ins for Liabilities Line 31			
3197. Summary of remaining write-ins for Line 31 from overflow page			
Additional Write-ins for Liabilities Line 34		T	
3497. Summary of remaining write-ins for Line 34 from overflow page			
Additional Write-ins for Summary of Operations Line 8.3			
08.397. Summary of remaining write-ins for Line 8.3 from overflow page			
Additional Write-ins for Summary of Operations Line 27			
2797. Summary of remaining write-ins for Line 27 from overflow page			
Additional Write-ins for Summary of Operations Line 53			
5397. Summary of remaining write-ins for Line 53 from overflow page			
Additional Write-ins for Exhibit of Nonadmitted Assets Line 9		T	
0997. Summary of remaining write-ins for Line 9 from overflow page			
Additional Write-ins for Exhibit of Nonadmitted Assets Line 23	П	I	T
2397. Summary of remaining write-ins for Line 23 from overflow page			

#### SUMMARY INVESTMENT SCHEDULE Admitted Assets as Reported in the Gross Investment Holdings Annual Statement 3 4 Investment Categories Amount Percentage Amount Percentage 1. Bonds: ...7,031,080 .42.662 42.662 1.1 U.S. treasury securities 1.2 U.S. government agency obligations (excluding mortgage-backed securities): 0.000 0.000 1.21 Issued by U.S. government agencies 1.22 Issued by U.S. government sponsored agencies .0.000 .0.000 1.3 Non-U.S. government (including Canada, excluding mortgaged-backed .0.000 .0.000 securities) 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 0.000 0.000 political subdivisions general obligations .0.000 0.000 1.43 Revenue and assessment obligations 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: 2,047,149 12.421 2,047,149 12.421 1.511 Issued or guaranteed by GNMA 1.512 Issued or guaranteed by FNMA and FHLMC . .522.055 3.168 ..522.055 3.168 0.000 .0.000 1.513 All other ... 1.52 CMOs and REMICs: 1.521 Issued or guaranteed by GNMA, FNMA, FHLMC or VA 286.984 1.741 286.984 1.741 1.522 Issued by non-U.S. Government issuers and collateralized by mortgage-backed securities issued or guaranteed by agencies shown in Line 1.521 270,245 1.640 270,245 1.640 1.523 All other .0.000 .0.000 2. Other debt and other fixed income securities (excluding short-term): 2.1 Unaffiliated domestic securities (includes credit tenant loans and hybrid 4,240,147 25.728 4,240,147 25.728 securities) 2.2 Unaffiliated non-U.S. securities (including Canada) 995.403 6.040 .995,403 6.040 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 498,650 3.026 498,650 3.026 3.3 Publicly traded equity securities (excluding preferred stocks): .0.000 3.31 Affiliated 0.000 3.32 Unaffiliated 0.000 0.000 3.4 Other equity securities: 0.000 .0.000 3.41 Affiliated . 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 .0.000 .0.000 4.2 Agricultural 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: 0.000 0.000 5.1 Property occupied by the company 5.2 Property held for the production of income (including \$ .... of property acquired in satisfaction of 0.000 0.000 debt) 5.3 Property held for sale (including \$ property acquired in satisfaction of debt). 0.000 0.000 1,155 6 Contract loans 190 421 1.155 190 421 ...13,281 0.081 ...13,281 0.081 7. Receivables for securities . 8. Cash, cash equivalents and short-term investments .385,506 2.339 385,506 .2.339 9. Other invested assets 0.000 0.000 16,480,921 16,480,921 100.000 Total invested assets 10. 100.000

Schedule A - Verification - Real Estate NONE

Schedule B - Verification - Mortgage Loans N O N E

#### SCHEDULE BA - VERIFICATION BETWEEN YEARS

Other Long-Term Invested Assets

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

## **SCHEDULE D - VERIFICATION BETWEEN YEARS**

Bonds and Stocks

1.	Book/adjusted carrying value, December 31 of prior year	
2.	Cost of bonds and stocks acquired, Part 3, Column 7	
3.	Accrual of discount	
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	1,712
6.	Deduction consideration for bonds and stocks disposed of, Part 4, Column 7	
7.	Deduct amortization of premium	
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)	
11.	Deduct total nonadmitted amounts	
12.	Statement value at end of current period (Line 10 minus Line 11)	

## SCHEDULE D - SUMMARY BY COUNTRY

		Long-Term Bonds and Sto	ocks OWNED December 31	l of Current Year		
			1 Book/Adjusted	2	3	4
	)escripti	on	Carrying Value	Fair Value	Actual Cost	Par Value of Bonds
BONDS	1.				9,100,011	8,995,465
Governments	2.	Canada				· · · · ·
(Including all obligations guaranteed	3.	Other Countries				
by governments)	4.	Totals	9,078,229	9,505,939	9,100,011	8,995,465
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	809,039	868,824	800,347	863,596
	8.	United States			4,677,883	
Industrial and Miscellaneous, Credit Tenant Loans and Hybrid Securities	9.	Canada				
(unaffiliated)	10.	Other Countries	995,404	1,067,500	966,365	1,000,000
	11.	Totals	5,505,795	5,718,303	5,644,248	5,419,168
Parent, Subsidiaries and Affiliates	12.	Totals				
	13.	Total Bonds	15,393,063	16,093,066	15,544,606	15,278,229
PREFERRED STOCKS	14.	United States				
Industrial and Miscellaneous	15.	Canada				
(unaffiliated)	16.	Other Countries				
	17.	Totals	498,650	491,855	481,952	
Parent, Subsidiaries and Affiliates	18.	Totals				
	19.	Total Preferred Stocks	498,650	491,855	481,952	
COMMON STOCKS	20.	United States				
Industrial and Miscellaneous	21.	Canada				
(unaffiliated)	22.	Other Countries				
	23.	Totals				
Parent, Subsidiaries and Affiliates	24.	Totals				
	25.	Total Common Stocks				
	26.	Total Stocks	498,650	491,855	481,952	
	27.	Total Bonds and Stocks	15,891,713	16,584,921	16,026,558	

#### 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

r	Quality and M			December 31, at B			or Types of Issues a				
	1	2 Over 1 Veer	3 Over 5 Veero	4 Over 10 Veer-	5	6		8 Tatal from Cal. C	9 % From Col. 7	10 Total Dublish	11 Tetel Drivetely
Quality Rating per the NAIC Designation	1 Year or Less	Over 1 Year Through 5 Years	Over 5 Years Through 10 Years	Over 10 Years Through 20 Years	Over 20 Years	Total Current Year	Col. 6 as a % of Line 10.7	Total from Col. 6 Prior Year	% From Col. 7 Prior Year	Total Publicly Traded	Total Privately Placed (a)
1. U.S. Governments	1 100.01 2000	initiagite reale	in ough to toulo	rinough zo routo	0101 20 10410	Fotal Gallont Foa	2.110 1017	i noi rodi	1 1101 1 0001		1 14004 (4)
1.1 Class 1				.370.510			59.9			9,447,925	
1.2 Class 2	, ,	, , ,	,	,	,	, ,		, ,		, ,	
1.3 Class 3											
1.4 Class 4											
1.5 Class 5											
1.6 Class 6											
1.7 Totals	1,680,079	6,703,843	385,169	370,510	308,324	9,447,925	59.9	9,437,661	57.8	9,447,925	
2. All Other Governments	.,,	-,,		,	,					-,,	
2.1 Class 1											
2.2 Class 2											
2.3 Class 3											
2.4 Class 4											
2.5 Class 5											
2.6 Class 6											
2.7 Totals											
3. U.S. States, Territories and Possessions etc.,											
Guaranteed											
3.1 Class 1											
3.2 Class 2											
3.3 Class 3											
3.4 Class 4											
3.5 Class 5											
3.6 Class 6											
3.7 Totals											
4. U.S. Political Subdivisions of States, Territories and											
Possessions, Guaranteed											
4.1 Class 1											
4.2 Class 2											
4.3 Class 3											
4.4 Class 4											
4.5 Class 5											
4.6 Class 6											
4.7 Totals											
5. U.S. Special Revenue & Special Assessment Obligations etc., Non-Guaranteed											
5.1 Class 1							5.1				
5.2 Class 2			,			,		, .			
5.3 Class 3											
5.4 Class 4											
5.5 Class 5											
5.6 Class 6											
5.7 Totals	118,210	349,733	149,980	143,822	47,294	809,039	5.1	936,094	5.7	809,039	

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

	1	2	3	4	5	6	7	8	9	10	11
		Over 1 Year	Over 5 Years	Over 10 Years			Col. 6 as a % of	Total from Col. 6	% From Col. 7	Total Publicly	Total Privately
Quality Rating per the NAIC Designation	1 Year or Less	Through 5 Years	Through 10 Years	Through 20 Years	Over 20 Years	Total Current Year	Line 10.7	Prior Year	Prior Year	Traded	Placed (a)
6. Industrial & Miscellaneous (Unaffiliated)											
6.1 Class 1	1,009,158	1,511,749				4,027,550	25.6	4,247,318		4,027,550	
6.2 Class 2							6.2	1,212,657			
6.3 Class 3									3.1		
6.4 Class 4											
6.5 Class 5											
6.6 Class 6											
6.7 Totals	1, 159, 324	2,131,356	989,516	1,225,599		5,505,795	34.9	5,959,097	36.5	5,505,795	
7. Credit Tenant Loans											
7.1 Class 1											
7.2 Class 2											
7.3 Class 3											
7.4 Class 4											
7.5 Class 5											
7.6 Class 6											
7.7 Totals											
8. Hybrid Securities											
8.1 Class 1											
8.2 Class 2											
8.3 Class 3											
8.4 Class 4											
8.5 Class 5											
8.6 Class 6											
8.7 Totals											
9. Parent, Subsidiaries and Affiliates											
9.1 Class 1											
9.2 Class 2											
9.3 Class 3											
9.4 Class 4											
9.4 Class 4 9.5 Class 5											
9.5 Class 5											
9.6 Class 6 9.7 Totals											
9.1 10tais						1	I				

#### 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

Outling net Phot NAC Designation         1 Year rese         Through 5 Years         Through 2 Years         Total Concent Year         Total		1	2	3	4	5	6	7	8	9	10	11
0. Total Book Current Year         0. Total Socie Current Year	Quality Rating per the NAIC Designation	1 Year or Less				Over 20 Years	Total Current Year					Total Private Placed (a)
101 Olass 1       (r) 2, 207 40       3, 565, 565       1, 77, 741       555, 681       14, 24, 514       99, 6       xxxx       xxxx       14, 24, 514         102 Class 5       (r)	, , , , , , , , , , , , , , , , , , , ,											
10.2 Cause 2         (n)         (n) </td <td></td> <td>(d) 2.807.447</td> <td>8,565,325</td> <td>1.278.383</td> <td>1.277.741</td> <td>355,618</td> <td>14,284,514</td> <td>90.6</td> <td>XXX</td> <td>XXX</td> <td>14,284,514</td> <td></td>		(d) 2.807.447	8,565,325	1.278.383	1.277.741	355,618	14,284,514	90.6	XXX	XXX	14,284,514	
11.0 Close 3         (n)	10.2 Class 2						, , , , , , , , , , , , , , , , , , , ,					
104 Class 4         (n) <th< td=""><td></td><td>· · ·</td><td></td><td></td><td>······, ····</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></th<>		· · ·			······, ····							
10 6 Clines 6         (i)	10.4 Class 4	(-)	,				,				,	
Info         Info <th< td=""><td>10.5 Class 5</td><td></td><td></td><td></td><td></td><td></td><td>(c)</td><td></td><td></td><td></td><td></td><td></td></th<>	10.5 Class 5						(c)					
10 Totals         2 497 613         9,94,832         1,524,665         1,729,811         2356,616         10,1 / 23,3         100,0         xxxx         xxxx <td>10.6 Class 6</td> <td>· /</td> <td></td> <td></td> <td></td> <td></td> <td>( )</td> <td></td> <td></td> <td></td> <td></td> <td></td>	10.6 Class 6	· /					( )					
10.8 Line 10.7 as a % of Col. 6         118.8         58.3         9.7         11.0         2.3         100.0         XXX         XXXX         XXX         XXX			9 184 932	1 524 665	1 739 931	355 618		100.0			15 762 759	
1. Total Bronds Prior Year         1. Total Bronds Prior Year <th< td=""><td></td><td></td><td>,,</td><td></td><td>, , , , , , , , , , , , , , , , , , , ,</td><td>,</td><td>(-)</td><td></td><td></td><td></td><td></td><td></td></th<>			,,		, , , , , , , , , , , , , , , , , , , ,	,	(-)					
11.1 Class 1       2.20,837       9.582,784       1,701,821       1,003,773       1017,88       XXX				•				7000	7000	7000		
11.2 Class 2       504.801       245.838       .462.018       XXX       XXX       XXX       .499.122       .31       .499.122         11.4 Class 4		2 220 937	9 592 784	1 701 821	1 003 773	101 758	XXX	XXX	14 621 073	89.5	14 621 073	
11.3 Class 3		_,,00/										
11 A Class 4				io,000								
11.5 Class 6       xxx												
11.6 Class 6									(c)			
11.7 Totals         2.20,937         10,566,707         1.947,659         1.465,791         101,758         XXX         XXX         100.0         XXX         112 Class 4         114 Glass 4         90.6         14,621,073         88.5         14,284,514         XXX         122 Class 4         149,528         XXX         XXXX									( )			
11.8 Line 11.7 as a % of Col. 8       13.6       64.9       11.9       9.0       0.6       XXX       XXX       100.0       XXX       100.0         2. Total Publicly Traded Bonds       2, 807,447       8, 565,325       1, 278,383       1, 277,741       355,618       14, 284,514       90.6       14, 621,073       99.5       14, 284,514       XXX         12. Class 1       2, 807,447       8, 565,325       1, 278,383       1, 277,741       355,618       14, 284,514       90.6       14, 621,073       99.5       14, 284,514       XXX         12.2 Class 2       150,166       120,079       246,282       462,190       978,717       6.2       1, 212,657       7.4       978,717       XXX         12.4 Class 4		2 220 937	10 596 707	1 947 659	1 465 791	101 758				100.0	16 332 852	
2. Total Publicly Traded Bonds       2,807,447       8,565,325       1,278,383       1,277,741       355,618       14,284,514       90.6       14,621,073       89.5       14,284,514       xxxx         12.2 Class 2       150,166       120,079       246,282       462,190       978,717       6.2       1,212,657       7.4       978,717       xxxx         12.3 Class 4       499,528       3.2       499,122       3.1       499,528       xxxx         12.4 Class 4       499,528       3.2       499,122       3.1       499,528       xxxx         12.6 Class 5       409,528       3.2       499,122       3.1       499,528       xxxx         12.7 Totals       2,957,613       9,184,932       1,524,665       1,739,931       355,618       15,762,759       100.0       16,332,852       100.0       15,762,759       xxxx         12.8 Line 12.7 as a % of Col. 6       18.8       58.3       9.7       11.0       2.3       100.0       xxxx       xxxx       100.0       xxxx       xxxx       100.0       xxxx       13,702,852       100.0       xxxx       13,702,852       100.0       xxxx       13,702,852       100.0       xxxx       13,702,853       13,702,853       13,702,853       13,		, ,,,,		,. ,	, , , ,	,			· · ·		.,,	
12.1 Class 1       2.807.447       8,565.325       1.277.343       1.277.741       3355,618       1.4 284,514       90.6       14,621.073       98.5       1.4 284,514       XXXL         12.2 Class 2       150.166       120.079       246,282       .462.190       .978,717       6.2       1.212,657       7.4       .978,717       XXXL         12.4 Class 4		10.0	01.0	11.0	0.0	0.0	7000	,,,,,	100.0	,,,,,	100.0	
12.2 Class 2       150, 166       120, 079       246, 282       .462, 190		2 807 447	8 565 325	1 278 383	1 277 741	355 618	14 284 514	90.6	14 621 073	89.5	14 284 514	XXX
12.3 Class 3												
12.4 Class 4												
12.5 Class 5												
$\begin{array}{c c c c c c c c c c c c c c c c c c c $												
12.7 Totals       2.957,613       9.184,932       1.524,665       1.739,931       .355,618       .15,762,759       .100.0       .16,332,852       .100.0       .15,762,759       .xxx         12.8 Line 12.7 as a % of Col. 6       18.8       58.3       9.7       11.0       2.3       100.0       .xxx       .xxx       .xxx       100.0       .xxx       .xxx       100.0       .xxx       .xxx       .xxx       100.0       .xxx       .xxx       .xxx       100.0       .xxx												
12.8 Line 12.7 as a % of Col. 6.       18.8       58.3       9.7       11.0       2.3       100.0       XXX       XXX       XXX       100.0       XXX         12.9 Line 12.7 as a % of Line 10.7, Col. 6, Section 10       18.8       58.3       9.7       11.0       2.3       100.0       XXX       XXX       XXX       100.0       XXX         3. Total Privately Placed Bonds       18.8       58.3       9.7       11.0       2.3       100.0       XXX       XXX       XXX       100.0       XXX         13.1 Class 1		2 957 613	9 184 932	1 524 665	1 739 931	355 618	15 762 759	100.0	16 332 852	100.0	15 762 759	
12.9 Line 12.7 as a % of Line 10.7, Col. 6, Section 10       18.8       58.3       9.7       11.0       2.3       100.0       XXX       XXX       XXX       100.0       XXX         3. Total Privately Placed Bonds					, ,							
Section 10         18.8         58.3         9.7         11.0         2.3         100.0         XXX         XXX         XXX         XXX         100.0         XXX           3. Total Privately Placed Bonds         13.1 Class 1												
13.1 Class 1		18.8	58.3	9.7	11.0	2.3	100.0	XXX	XXX	XXX	100.0	XXX
13.2 Class 2	3. Total Privately Placed Bonds											
13.3 Class 3	13.1 Class 1										XXX	
13.4 Class 4	13.2 Class 2										XXX	
13.5 Class 5	13.3 Class 3										XXX	
13.6 Class 6          XXX         13.7 Totals            XXX         13.8 Line 13.7 as a % of Col. 6            XXX       XXX       XXX         13.9 Line 13.7 as a % of Line 10.7, Col. 6,	13.4 Class 4										XXX	
13.7 Totals											XXX	
13.8 Line 13.7 as a % of Col. 6	13.6 Class 6										XXX	
13.9 Line 13.7 as a % of Line 10.7, Col. 6,	13.7 Totals										XXX	
13.9 Line 13.7 as a % of Line 10.7, Col. 6, Section 10 XXX XXX XXX XXX XXX	13.8 Line 13.7 as a % of Col. 6							XXX	XXX	XXX	XXX	
								XXX	XXX	xxx	XXX	
) Includes \$ freely tradable under SEC Rule 144 or qualified for resale under SEC Rule 144A.		\$								tions. The letter "Z" mea		

#### 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

Ivia.	urity Distribution o										
	1	2 Over 1 Veer	3 Over 5 Years	4 Over 10 Years	5	6	7 Col 6 oo o % of	8 Total from Col. 6 Prior	9 % From Col. 7	10 Total Publicly	11 Total Privately
Distribution by Type	1 Year or Less	Over 1 Year Through 5 Years	Over 5 Years Through 10 Years	Over 10 Years Through 20 Years	Over 20 Years	Total Current Year	Col. 6 as a % of Line 10.7	Year	% From Col. 7 Prior Year	Traded	Placed
1. U.S. Governments	1 1041 01 2000	initiagine route	rinough to routo	mough zo routo	0101 20 10010	Total Garrent Foar	2000 1000	104	The real	Hadoa	1 10000
1.1 Issuer Obligations	1,375,249	6,025,527				7,400,776		8,886,049			
1.2 Single Class Mortgage-Backed /Asset Backed Securities	304,830	678,316	385,169	370,510	308,324	2,047,149	13.0	551,612	3.4	2,047,149	
1.7 Totals	1,680,079	6,703,843	385,169	370,510	308,324	9,447,925	59.9	9,437,661	57.8	9,447,925	
2. All Other Governments											
2.1 Issuer Obligations											
2.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
2.3 Defined											
2.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
2.5 Defined											
2.6 Other	-										
2.7 Totals											
3. U.S. States, Territories and Possessions, Guaranteed											
3.1 Issuer Obligations											
3.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
3.3 Defined											
3.4 Other MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED											
SECURITIES:											
3.5 Defined											
3.6 Other											
3.7 Totals											
4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed											
4.1 Issuer Obligations											
4.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
4.3 Defined											
4.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED											
SECURITIES:											
4.5 Defined											
4.6 Other											
4.7 Totals 5. U.S. Special Revenue & Special Assessment Obligations etc., Non-Guaranteed	+										
5. U.S. Special Revenue & Special Assessment Obligations etc., Non-Guaranteed 5.1 Issuer Obligations											
5.2 Single Class Mortgage-Backed /Asset Backed Securities		159,840					3.3		3.5	522,055	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
5.3 Defined	60.915	189,893				286.984	1.8		2.2	286.984	
5.4 Other	1									200,001	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
5.5 Defined											
5.6 Other	-										
5.7 Totals	118,210	349,733	149,980	143,822	47,294	809,039	5.1	936,093	5.7	809,039	

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

	1	2	3	4	5	6	7	8	9	10	11
		Over 1 Year	Over 5 Years	Over 10 Years	-	-	Col. 6 as a % of	Total from Col. 6	% From Col. 7	Total Publicly	Total Privately
Distribution by Type	1 Year or Less	Through 5 Years	Through 10 Years	Through 20 Years	Over 20 Years	Total Current Year	Line 10.7	Prior Year	Prior Year	Traded	Placed
6. Industrial and Miscellaneous											
6.1 Issuer Obligations		2,011,277		1,225,599		<u>5</u> ,235,550		5,596,645			
6.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
6.3 Defined									2.2		
6.4 Other						270,245	1.7			270,245	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES:											
6.5 Defined											
6.6 Other											
6.7 Totals	1, 159, 324	2,131,356	989,516	1,225,599		5,505,795	34.9	5,959,097	36.5	5,505,795	
7. Credit Tenant Loans											
7.1 Issuer Obligations											
7.2 Single Class Mortgage-Backed Securities											
7.7 Totals											
8. Hybrid Securities											
8.1 Issuer Obligations											
8.2 Single Class Mortgage-Backed /Asset Backed Securities MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
8.3 Defined											
8.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES:											
8.5 Defined											
8.6 Other											
8.7 Totals											
9. Parent, Subsidiaries and Affiliates 9.1 Issuer Obligations											
9.2 Single Class Mortgage-Backed /Asset Backed Securities											
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES: 9.3 Defined											
9.4 Other											
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET- BACKED SECURITIES:											
9.5 Defined											
9.6 Other											
9.7 Totals											

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

IVic	aturity Distribution of	2						8	9	10	11
	I	2 Over 1 Year	Over 5 Years	4 Over 10 Years	5	6	Col. 6 as a % of	8 Total from Col. 6 Prior	9 % From Col. 7	Total Publicly	Total Privately
Distribution by Type	1 Year or Less	Through 5 Years	Through 10 Years	Through 20 Years	Over 20 Years	Total Current Year	Line 10.7	Year	Prior Year	Traded	Placed
10. Total Bonds Current Year											
10.1 Issuer Obligations				1,225,599				XXX	XXX		
10.2 Single Class Mortgage-Backed /Asset Backed Securities						2,569,204		XXX	XXX		
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
10.3 Defined								XXX	XXX		
10.4 Other								XXX	XXX		
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES: 10.5 Defined								xxx	xxx		
10.6 Other								XXX			
10.7 Totals			1.524.665				100.0	XXX	XXX		
10.7 Totals	2,957,613 18.8			1,739,931 11.0	2.3					100.0	
	18.8	58.3	9.7	11.0	2.3	100.0	XXX	XXX	XXX	100.0	
11. Total Bonds Prior Year	1,843,122	9,760,726	1,650,206	1,228,640		100/	1000	14,482,694	88.7	14.482.694	
11.1 Issuer Obligations		400.636		1,228,640 237,151	101.758	XXX	XXX				
11.2 Single Class Mortgage-Backed /Asset Backed Securities MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:			2 10,296			XXX	XXX				
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES: 11.3 Defined	196,467	435.344				2004	2004	718,968	4.4	718,968	
11.3 Defined						XXX	XXX	/ 10,900		/ 10,900	
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED						XXX	XXX				
MOLTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES: 11.5 Defined						xxx	XXX				
11.6 Other						XXX	XXX				
11.7 Totals	2.220.937	10,596,706	1,947,659	1,465,791	101.758	XXX	XXX		100.0	16.332.851	
11.8 Line 11.7 as a % of Col. 8	2,220,937	64.9		1,403,791 9.0	0.6		XXX XXX	10,332,831		10,332,831	
12. Total Publicly Traded Bonds	13.0	04.9	11.9	9.0	0.0	***	***	100.0	***	100.0	
	2.384.407	8.036.804	989.516	1,225,599		12.636.326	80.2	14.482.694	88.7	12.636.326	xxx
12.1 Issuer Obligations 12.2 Single Class Mortgage-Backed /Asset Backed Securities		8,036,804						, , , , , , , , , , , , , , , , , , , ,			
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:		, ,	, , ,			, ,		1, 131, 189		, , ,	XXX
12.3 Defined								718,968	4.4		XXX
12.4 Other							1.7				XXX
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES: 12-5 Defined											xxx
12.6 Other											XXX
12.7 Totals	2.957.613	9,184,932	1.524.665	1.739.931		15.762.759	100.0		100.0	15,762,759	XXX
12.8 Line 12.7 as a % of Col. 6							XXX		XXX	100.0	
12.9 Line 12.7 as a % of Line 10.7, Col. 6, Section 10	18.8	58.3		11.0	2.3	100.0	XXX	XXX	XXX	100.0	XXX
13. Total Privately Placed Bonds		0010			2.0		,,,,,	7000	7000		7000
13.1 Issuer Obligations										XXX	
13.2 Single Class Mortgage-Backed /Asset Backed Securities		1				1				XXX	
MULTI-CLASS RESIDENTIAL MORTGAGE-BACKED SECURITIES:											
13.3 Defined		(1)				(1)	0.0			XXX	(1
13.4 Other		(')								XXX	(
MULTI-CLASS COMMERCIAL MORTGAGE-BACKED/ASSET-BACKED SECURITIES:											
13.5 Defined										XXX	
13.6 Other										XXX	
13.7 Totals										XXX	
13.8 Line 13.7 as a % of Col. 6							XXX		XXX	XXX	
13.9 Line 13.7 as a % of Line 10.7, Col. 6, Section 10	1		1			1	XXX	XXX	XXX	ХХХ	

## SCHEDULE DA - VERIFICATION BETWEEN YEARS

Short-Term Investments

	1	2	3	4 Other Short-term	5 Investments in Parent,
	Total	Bonds	Mortgage Loans	Investment Assets (a)	Subsidiaries and Affiliates
1. Book/adjusted carrying value, December 31 of prior year					
2. Cost of short-term investments acquired					
3. Accrual of discount					
4. Unrealized valuation increase (decrease)					
5. Total gain (loss) on disposals					
6. Deduct consideration received on disposals	5,708,080				
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)	369,696	369,696			

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

Schedule DB - Part A - Verification  $\,$  - Options, Caps, Floors and Insurance Futures Options Owned NONE

Schedule DB - Part B - Verification  $\,$  - Options, Caps, Floors and Insurance Futures Options Written  $N \ O \ N \ E$ 

Schedule DB - Part C - Verification - Swaps and Forwards NONE

Schedule DB - Part D - Verification - Futures Contracts and Insurance Futures Contracts  $N \ O \ N \ E$ 

Schedule DB - Part E - Verification - Statement Value and Fair Value of Open Contracts  $N \ O \ N \ E$ 

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

Schedule DB - Part F - Section 2 - Reconciliation of Replicated (Synthetic) Assets Open  $N\ O\ N\ E$ 

Schedule E - Verification - Cash Equivalents

Schedule A - Part 1 - Real Estate Owned NONE

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

Schedule A - Part 3 - Real Estate Disposed NONE

Schedule B - Part 1 - Mortgage Loans Owned NONE

Schedule B - Part 2 - Mortgage Loans Acquired and Additions Made  $N\ O\ N\ E$ 

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  $N\ O\ N\ E$ 

## **SCHEDULE D - PART 1**

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

	0	0.1			-								1					<b>D</b>	
1	2	Code		6	/		air Value	10	11			usted Carrying Value			1	nterest		Da	
		3 4	5			8	9			12	13	14 15	16	17	18	19	20	21	22
												Total							
												Foreign							
		F										3							
												Current Exchange							
		0										Year's Change							
		r				Rate					Current	Other in							
		Ce				Used to			Book/	Unrealized	Year's	Than Book/				Admitted			
																	• •		
		o i				Obtain			Adjusted	Valuation	(Amor-	Temporary Adjusted		Effective		Amount	Amount		
CUSIP		d g	Bond	NAIC	Actual	Fair	Fair	Par	Carrying	Increase/	tization)	Impairment Carrying	Rate	Rate	When	Due and	Received		
Identification	Description	e n	Char	Des.	Cost	Value	Value	Value	Value	(Decrease)	Accretion	Recognized Value	of	of	Paid	Accrued	During Year	Acquired	Maturity
			Unai	Des.						(Decrease)		Tiecognized Value			i aiu				
	S TREASURY NOTES	SD		!	1,338,852	107.9060	1,456,734	1,350,000	1,345,160		1,208		4.250	4.358	FA	21,672		04/30/2004	08/15/2013
	S TREASURY NOTES	SD		1		110.0310							4.750	4.474		925	7, 125	07/06/2004	05/15/2014
	S TREASURY	SD		1		104.9060					172		4.750	4.831	MS	2,852		04/04/2006	03/31/2011
912828-FS-4 U	S TREASURY			1	2,007,500	106.0390					(1,555)		4.625	4.538				09/27/2006	08/31/2011
912828-GC-8 U	S TREASURY			1		106.8440							4.625	4.751	JD				12/31/2011
912828-GQ-7 U	S TREASURY	SD		1		107.2110	964,898						4.500	4.781	AO	6,936		05/24/2007	04/30/2012
	S TREASURY			1			1,015,664	1,000,000	1,005,552		(14,727)		4.500	2.978		.5,843		12/06/2007	
	S TREASURY			1		108.4530	325.359						4.875	4.978					
	S TREASURY US TREASURY N/B	SD		1	598.031	104.1880	625, 125	600,000			381		3.125	3.197					04/30/2012
	Governments - Issuer Obligations				7,052,238		7,454,358	7,035,000	7,031,080		(11,850)		XXX	XXX		72,973	310,163	XXX	XXX
	overnment National Mortgage A POOL 724266	.+	2	1			1,223,842	1, 166, 728			(326)		5.500	4.524		5,348	10,695	09/23/2009	
	NM 2009-20 A POOL 726376		2	1		103.0280					(25)		5.000	4.646				11/20/2009	10/15/2039
	overnment National Mortgage A POOL 675496	k	2	1								L	6.500	4.705					
	Governments - Single Class Mortgage-	Backed/Ass	et-Back	ed										1		,			
		-Dackeu/Ass	Sel-Dack	eu		2004							2004	2004	2004			2004	2004
	urities				2,047,773	XXX	2,051,581	1,960,465	2,047,149		(457)		XXX	XXX	XXX	9,025	29,892	XXX	XXX
0399999. Tota	I - U.S. Government Bonds				9,100,011	XXX	9,505,939	8,995,465	9,078,229		(12,307)		XXX	XXX	XXX	81,998	340,055	XXX	XXX
1099999 Tota	I - All Other Government Bonds					XXX							XXX	XXX	XXX			XXX	XXX
	I - U.S. States, Territories and Possessi	ions Bonds				XXX							XXX	XXX	XXX			XXX	XXX
2499999. Tota	I - U.S. Political Subdivisions Bonds					XXX							XXX	XXX	XXX			XXX	XXX
31297A-5B-6 F	HLMC POOL #A23542		2	1		100.3540							4.500	6.528	MON			06/10/2004	
	NMA POOL #720649		2	1	235,141	97.1350	258,816	266,449	239.304		649		4.000		MON	888	10,658		05/01/2033
					200, 141		200,010		200,004										
	Special Revenues - Single Class Morto	jage-васкес	J/ASSEI-E	заскео															
Seci	urities				516,838	XXX	565,520	572,070	522,055		43		XXX	XXX	XXX	2,034	24,411	XXX	XXX
31394Y-KH-6 F	HLMC REMIC SER 2791 OB (SEQ-NAS)		2	1		104.0400							4.500	5.120	MON	1,093			
	Special Revenues - Defined Multi-Clas	c Posidontia	Mortaa	00	, , , , , , , , , , , , , , , , , , , ,			, ,								,	,		
		is nesidentia	ai wonga	iye-		2004							2004	2004	2004			2004	2004
	ked Securities				283,509	XXX	303, 304	291,526	286,984		916		XXX	XXX	XXX	1,093	13,119	XXX	XXX
3199999. Tota	I - U.S. Special Revenues Bonds				800,347	XXX	868,824	863,596	809,039		959		XXX	XXX	XXX	3,127	37,530	XXX	XXX
	NHEUSER-BUSCH CO NTS			2FE	244.088	102.1560						ii	5.050		A0				10/15/2016
	DE ING CO DEBS			1FE			450,009	395,000	448,452		(2,073)		7.250			1,273	28,638	07/03/2003	06/15/2025
	OTTLING GROUP LLC UNSEC'D SR NTS SER B							250,000	236,881			[ [	4.125				10,313	07/06/2004	06/15/2015
	URLINGTON RESOURCES DEBS			1FE		103.4180								6.633					
		-+										<u>├</u> <u>├</u>							
	IMBERLY CLARK CORP NTS			1FE		108.9520					(1,140)	+ <b>+</b>	6.375	5.291				07/03/2003	01/01/2028
	ERRILL LYNCH & CO UNSUB SR NTS SER C	-+		1FE		101.2020					(1,818)		5.000	4.548		10,278		03/24/2004	
	EP GENERATING CO	-+	2	2FE		117.3250							9.820	10.170			46,545	09/05/1990	12/07/2022
852060-AJ-1 S	PRINT CAP CORP NOTES			3FE		102.3750					405		7.625	7.718		15,991		01/18/2001	01/30/2011
	S BANK NA SUB NTS			1FE		104.9330					(1,042)		4.800	4.527				03/25/2004	04/15/2015
913017-BD-0 U	NITED TECHNOLOGIES UNSEC'D NTS			1FE		105.9870							6.350	4.555	MS			02/04/2003	03/01/2011
458182-BM-3 I	NTER AMERICAN DEVELOPMENT BNK			1FE		108.8890	544,446					L	8.500	9,700	MS				
	ELEFONICA EUROPE BV GLOBAL	F		1FE			523,054	500,000			(2,755)		7.750			11,410			
	strial and Miscellaneous (Unaffiliated) -	lecuar Oblia	ations		5,372,622		5,486,116	5,148,978	5,235,550		(23,754)		XXX	XXX		84,461	365,471	XXX	XXX
		issuer Oblig	aliuns	07+															
	ASTER ASSET SECURITIZATION 2006-3 1A10		2	2Z*		85.9350					(586)		6.000	5.624	MON	1,351		01/11/2007	04/25/2012
3599999. Indu	strial and Miscellaneous (Unaffiliated) -	Other Multi-	Class Re	esidential										1					
	gage-Backed Securities				271.626	XXX	232.187	270, 190	270,245		(586)		XXX	XXX	XXX	1.351	16,211	XXX	XXX
	I - Industrial and Miscellaneous (Unaffili	inted) Danda	<u></u>		1.1.1	XXX					1	1	XXX	XXX	XXX			XXX	XXX
		aleu) bonds	<b>)</b>		5,644,248		5,718,303	5,419,168	5,505,795		(24,340)					85,812	381,682		
4199999. Tota	I - Credit Tenant Loans					XXX						<u>                                      </u>	XXX	XXX	XXX			XXX	XXX
4899999 Tota	I - Hybrid Securities					XXX							XXX	XXX	XXX			XXX	XXX
		ondo				XXX	i						XXX	XXX	XXX			XXX	XXX
	I - Parent, Subsidiaries and Affiliates Bo	JIIUS																	
7799999. Tota	I - Issuer Obligations				12,424,860	XXX	12,940,474	12,183,978	12,266,630		(35,604)		XXX	XXX	XXX	157,434	675,634	XXX	XXX
	I - Single Class Mortgage-Backed/Asse	t-Backed Se	curities		2,564,611	XXX	2.617.101	2,532,535	2,569,204		(414)		XXX	XXX	XXX	11,059	54,303	XXX	XXX
				41			_,,				()	<u> </u>							
7999999. Tota	I - Defined Multi-Class Residential Morte	gage-Backe	a Securi	ties	283,509	XXX	303,304	291,526	286,984		916		XXX	XXX	XXX	1,093	13,119	XXX	XXX

## **SCHEDULE D - PART 1**

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

			<u> </u>			-															
1	2		Cod	es	6	/	Fa	air Value	10	11	Change	e in Book/Adj	usted Carryin	g Value			In	terest		Dat	tes
		3	4	5			8	9			12	13	14	15	16	17	18	19	20	21	22
														Total							
														Foreign							
			F										Current	Exchange							
			0										Year's	Change							
			r				Rate					Current	Other	in							
		С	е				Used to			Book/	Unrealized	Year's	Than	Book/				Admitted			
		0	i				Obtain			Adjusted	Valuation	(Amor-	Temporary	Adjusted		Effective		Amount	Amount		
CUSIP		d	g	Bond	NAIC	Actual	Fair	Fair	Par	Carrying	Increase/	tization)	Impairment	Carrying	Rate	Rate	When	Due and	Received		
Identification	Description	e	n	Char	Des.	Cost	Value	Value	Value	Value	(Decrease)	Accretion	Recognized	Value	of	of	Paid	Accrued	During Year	Acquired	Maturity
8099999. Total - Oth	ner Multi-Class Residential Mo	rtgage-Ba	acked	Securitie	s	271,626	XXX	232, 187	270, 190	270,245		(586)			XXX	XXX	XXX	1,351	16,211	XXX	XXX
8199999. Total - Def	fined Multi-Class Commercial	Mortgage	-Back	ed Secui	rities		XXX								XXX	XXX	XXX			XXX	XXX
8299999. Total - Oth	ner Multi-Class Commercial Mo	ortgage-B	acked	l/Asset-B	Backed																
Securities							XXX								XXX	XXX	XXX			XXX	XXX
8399999 - Total Bon	lds					15,544,606	XXX	16,093,066	15,278,229	15,393,063		(35,688)			XXX	XXX	XXX	170,937	759,267	XXX	XXX

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

Showing All PREFERRED STOCKS Owned December 31 of Current Year

1	2	Codes	5	6	7	8		air Value	11		Dividends			Change in E	Book/Adjusted	Carrying Value		20	21
		3 4					9	10		12	13	14	15	16	17	18	19		
CUSIP			Number	Par Value	Rate	Book/ Adjusted	Rate Per Share Used to Obtain				Amount	Nonadmitted	Unrealized Valuation	Current Year's (Amor-	Than Temporary	in Book/Adjusted	Total Foreign Exchange Change in Book/ Adjusted	NAIC	
Identi-		Fo	r- of	Per	Per	Carrying	Fair			Declared	Received	Declared But	Increase/	tization)	Impairment	Carrying Value	Carrying	Desig-	Date
fication	Description	Code eig	n Shares	Share	Share	Value	Value	Fair Value	Actual Cost	but Unpaid	During Year	Unpaid	(Decrease)	Accretion	Recognized	(15 + 16 - 17)	Value	nation	Acquired
	REGIONS FINANCIAL ASSET MGMT 8.44% PFD																		
	4/30/10 (144A)			1,000.00			983.710									3,768		RP3LFE	08/01/2004
8499999. To	otal - Preferred Stock - Industrial ar	nd Miscellar	neous (Unaffiliated)		1	498,650	XXX	491,855	481,952		42,200			3,768	1	3,768		XXX	XXX
				+															
													+						
													†						
8999999 - T	otal Preferred Stocks					498,650	XXX	491,855	481,952		42,200			3,768		3,768		XXX	XXX

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

Showing All COMMON STOCKS Owned December 31 of Current Year

1	2	Cod	les	5 6		Fa	air Value	9		Dividends		Ch	ange in Book/Ad	justed Carrying Va	alue	17	18
CUSIP Identi- fication	Description	3 Code	4 For- eign	Book Number Adjuste of Carryir Shares Value	k/ L ed o ng	7 Rate Per Share Jsed to Obtain Fair Value	8 Fair Value	Actual Cost	10 Declared but Unpaid	11 Amount Received During Year	12 Nonadmitted Declared But Unpaid	13 Unrealized Valuation Increase/ (Decrease)	14 Current Year's Other Than Temporary Impairment Recognized	15 Total Change in Book/Adjusted Carrying Value (13 - 14)	16 Total Foreign Exchange Change in Book/Adjusted Carrying Value	NAIC Market Indicator (a)	Date Acquired
																	<b> </b>
				++													<u> </u>
																	[
																	<b> </b>
				++													<u> </u>
				+									+				<b> </b>
				+									+				t
													<b>_</b>				
799999 - T	otal Common Stocks					XXX										XXX	XXX
899999 - T	otal Preferred and Common Stocks				498,650	XXX	491.855	481.952		42,200				3,768		XXX	XXX

## **SCHEDULE D - PART 3**

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

		0110	,			_		
1	2	3	4	5	6	7	8	9
								Paid for Accrued
CUSIP			Date		Number of Shares			Interest and
Identification	Description	Foreign	Acquired	Name of Vendor	of Stock	Actual Cost	Par Value	Dividends
3620AA-TX-6	Government National Mortgage A POOL 724266 5.500% 09/15/39			Banc of America Securities				
3620AC-6M-1	GNM 2009-20 A POOL 726376 5.000% 10/15/39		11/20/2009	JP Morgan Securities, Inc				1,385
0399999. Bonds	s - U.S. Governments					1,743,384	1,665,120	4,950
8399997. Total	- Bonds - Part 3					1,743,384	1,665,120	4,950
8399998. Total						21,057	20,099	61
8399999. Total	- Bonds					1,764,441	1,685,219	5,011
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 - Total	S					1,764,441	XXX	5,011

## SCHEDULE D - PART 4

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

	_	- 1		-					10 Change In Book/Adjusted Carrying Value								1.0			
1	2	3	4	5	6	7	8	9	10				1 1 0		16	17	18	19	20	21
										11	12	13	14	15						
														Total						
													Total	Foreign					Bond	
												Current	Change in	Exchange	Book/				Interest/	
									Prior Year		Current	Year's Other	Book/	Change in	Adjusted	Foreign			Stock	
									Book/	Unrealized	Year's	Than	Adjusted	Book/	Carrying	Exchange			Dividends	
CUSIP					Number of				Adjusted	Valuation	(Amor-	Temporary		Adjusted	Value at	Gain	Realized	Total Gain	Received	
Identi-		For-	Disposal	Name	Shares of	Con-			Carrying	Increase/	tization)/	Impairment		Carrying	Disposal	(Loss) on	Gain (Loss)	(Loss) on	During	Maturity
fication	Description	eign		of Purchaser	Stock	sideration	Par Value	Actual Cost	Value	Decrease	Accretion	Recognized		Value	Date	Disposal	on Disposal		Year	Date
	Government National Mortgage A POOL 675496	<u>.</u>								200.0400	71001011011	riccognizod	(	- dide	_ 0.00					
36295N-NM-5	6 500% 06/15/38			Paydown								)	(7,220)							06/15/2038
912828-CN-8	US TREASURY NOTES 3.625% 07/15/09		07/15/2009 _	Maturity							( 139)	)	(139)							07/15/2009
912828-FX-3	US TREASURY NOTES 4.625% 11/15/09		11/15/2009 .																	11/15/2009
	onds - U.S. Governments					1,490,167	1,490,167	1,496,897	1,496,962		(6,795)		(6,795)		1,490,167				60,098	
	FHLMC POOL #A23542 4.500% 06/01/34		12/01/2009 .	Paydown					49,642										1,398	06/01/2034
	FNMA REMIC SER 2001-68 JQ (SEQ) 5.500%																			
31392A-A7-3			04/01/2009 .	Paydown									55							03/25/2009
	FHLMC REMIC SER 2791 OB (SEQ-NAS) 4.500%		40 (04 (0000	<b>D</b> 1		40,000	40,000	44 407	11 100		700		700						004	05/15/2033
31394Y-KH-6	05/15/33 FNMA POOL #720649		12/01/2009					41,127 7.806	41,499 7,923											05/15/2033
	Bonds - U.S. Special Revenues		12/01/2009 _	_ Fayuown		133.682	133.683	128.807	128.013		5.670		5.670		133,683				2,895	
	GENERAL ELEC CAP CORP SUB NOTES 8.125%	- 1				133,062	133,003	128,807	126,013		5,670		5,670		133,003				2,890	~~~~
369622-DN-2			04/09/2009	Tender Offer		336.000					(2.792)		(2,792)				1.705	1.705	9 750	05/15/2012
003022 DN 2	MASTER ASSET SECURITIZATION 2006-3 1A10																			00/ 10/ 2012
	6.000% 10/25/36		12/01/2009	Paydown							(217)	)	(217)						2,942	04/25/2012
			T	Redemption									, ,							
74955D-AB-7	AEP GENERATING CO 9.820% 12/07/22		12/07/2009 .	100.0000													7	7	20	12/07/2022
3899999. E	onds - Industrial and Miscellaneous	(Unaff	filiated)			427,666	391,666	479,863	428,963		(3,009)	)	(3,009)		425,955		1,712	1,712	12,712	XXX
8399997. T	otal - Bonds - Part 4					2,051,515	2,015,516	2,105,567	2,053,938		(4,134)	)	(4,134)		2,049,805		1,712	1,712	75,705	XXX
8399998. T	otal - Bonds - Part 5					20,099	20,099	21,057			(958)	)	(958)		20,099				115	XXX
8399999. T	otal - Bonds					2.071.614	2,035,615	2.126.624	2,053,938		(5.092	)	(5.092)		2.069.904		1.712	1.712	75,820	XXX
	otal - Preferred Stocks - Part 4					1. 1.	XXX													XXX
	otal - Preferred Stocks - Part 5						XXX									1				XXX
	otal - Preferred Stocks						XXX				1	1	1	1		1	1			XXX
	otal - Common Stocks - Part 4						XXX					1				<u> </u>				XXX
	otal - Common Stocks - Part 5						XXX													XXX
	otal - Common Stocks						XXX										1			XXX
	otal - Preferred and Common Stocks						XXX									ł	-			XXX
98999999. 1		>				0.074.044	XXX	0 400 004	2.053.938		(5.092)		(5.000)		0.000.001		1.712	4 740	75.820	
222232323	IOIAIS					2,071,614	777	2,126,624	2,053,938		(5,092	)	(5,092)	1	2,069,904		1,/12	1,712	/5,820	777

## **SCHEDULE D - PART 5**

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

4	2	3	4		6					11					_	17	18	10	20	21
	2	3	4	5	Ö	1	ō	э	10	11			ok/Adjusted C			17	10	19	20	21
											12	13	14	15	16					
														<b>T</b>	Total					
														Total	Foreign					
							Par Value						Current		Exchange					
							(Bonds)			Book/		Current	Year's Other		Change in	Foreign			Interest and	
							or			Adjusted	Unrealized	Year's	_ Than	Adjusted	Book/	Exchange	Realized		Dividends	Paid for
CUSIP		_	_				Number of			Carrying	Valuation	(Amort-	Temporary		Adjusted	Gain	Gain	Total Gain		Accrued
Identi-		For-	Date		Disposal	Name of	Shares		Consid-	Value at	Increase/	ization)/		Value (12 +		(Loss) on	(Loss) on	(Loss) on	During	Interest and
fication		eign	Acquired	Name of Vendor	Date	Purchaser	(Stock)	Actual Cost	eration	Disposal	(Decrease)	Accretion	Recognized	13 - 14)	Value	Disposal	Disposal	Disposal	Year	Dividends
	vernment National Mortgage A POOL				10 (01 (0000 0			04.057		~ ~ ~ ~ ~		(050		(050)						
	266 5.500% 09/15/39			Banc of America Securities	12/01/2009 Pa	ydown							,	(958)						
	ds - U.S. Governments						20,099	21,057	20,099	20,099		(958		(958)					115	61
8399998. Tota							20,099	21,057	20,099	20,099		(958	)	(958)					115	61
	al - Preferred Stocks																			
	al - Common Stocks																			
9899999. Tota	al - Preferred and Common St	ocks	1	1	1		1													
			•••••																	
					· · · · · · · · · · · · · · · · · · ·															
							+	+								+	+		+	
																+			+	
																†				
				]																
																<u> </u>				
9999999 - Tot	tals							21,057	20,099	20,099		(958)	)	(958)					115	61

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

# ΝΟΝΕ

Schedule D - Part 6 - Section 2 NONE

## **SCHEDULE DA - PART 1**

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

1	2	Co	des	5	6		8			usted Carryin		13	14			Intere	st			21
		3	4		_		_	9	10	11	12	-		15	16	17	18	19	20	ı
								_			Total			-	_		-	-	-	ı
											Foreign			Amount Due						ı
										Current	Exchange			and Accrued						ı
									Current	Year's Other				Dec. 31 of						ı
							Book/	Unrealized	Year's	Than	Book/			Current	Non-				Amount	
CUSIP			_				Adjusted	Valuation	(Amor-	Temporary	Adjusted			Year on	Admitted		Effective		Received	Paid for
Identi-	Description	0	For-	Date		Maturity	Carrying	Increase/	tization)/	Impairment	Carrying	DevValue		Bonds not	Due and	Rate	Rate	When	During	Accrued
fication	Description	Code	eign	Acquired	Name of Vendor	Date	Value	(Decrease)	Accretion	Recognized	Value	Par value	Actual Cost	in Default	Accrued	OT	of	Paid	Year	Interest
	otal - U.S. Government Bonds															XXX	XXX	XXX		
	otal - All Other Government Bonds		<b>D</b> 1													XXX	XXX	XXX		
	otal - U.S. States, Territories and Po				ning Danda											XXX	XXX	XXX		
	otal - U.S. Political Subdivisions of S		erritories	and Posses	ssions Bonds											XXX	XXX	XXX XXX		
	otal - U.S. Special Revenues Bonds		- (()) - +	I)												XXX	XXX			
	otal - Industrial and Miscellaneous E	sonas (Ur	amilated	<b>1</b> )												XXX XXX	XXX XXX	XXX XXX		
	otal - Credit Tenant Loans															XXX	XXX	XXX		
	otal - Hybrid Securities															XXX	XXX	XXX		
	otal - Issuer Obligations otal - Single Class Mortgage-Backe	-1/4 + 17														XXX	XXX	XXX		
	otal - Defined Multi-Class Residentia															XXX	XXX	XXX		
	otal - Other Multi-Class Residential															XXX	XXX	XXX		
	otal - Defined Multi-Class Commerc															XXX	XXX	XXX		I
	otal - Other Multi-Class Commercial															XXX	XXX	XXX		I
8399999. T		rivioriyay	e-Dacker	u/Assel-Dau	cked Securities											XXX	XXX	XXX		
	otal - Parent, Subsidiaries and Affilia	atos										XXX				XXX	XXX	XXX		
	JP MORGAN OVERNIGHT SWEEP	4100		12/31/2009	Direct	XXX	369,696	3				~~~~	369.696			0.000	0.000	MN		
	JP MORGAN OVERNIGHT SWEEP				Various			,								0.000	0.000	MN		
	Exempt Money Market Mutual Funds		1	. 12/01/2003	1411040		369.696	3				XXX	369.696			XXX	XXX	XXX	395	
							000,000					,	000,000			,			000	
9199999 - 7	Totals						369,696	6				XXX	369,696			XXX	XXX	XXX	395	

Schedule DB - Part A - Section 1 - Options, Caps, Floors and Insurance Futures Options Owned  $N \ O \ N \ E$ 

Schedule DB - Part A - Section 2 - Options, Caps, Floors and Insurance Futures Options Acquired NONE

Schedule DB - Part A - Section 3 - Options, Caps, Floors and Insurance Futures Options Terminated  $N\ O\ N\ E$ 

Schedule DB - Part B - Section 1 - Options, Caps, Floors and Insurance Futures Options Written and In Force NONE

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

Schedule DB - Part B - Section 3 - Options, Caps, Floors and Insurance Futures Options Terminated NONE

Schedule DB - Part C - Section 1 - Collar, Swap and Forwards Open NONE

Schedule DB - Part C - Section 2 - Collar, Swap and Forwards Opened  $N\ O\ N\ E$ 

Schedule DB - Part C - Section 3 - Collar, Swap and Forwards Terminated NONE

Schedule DB - Part D - Section 1 - Futures Contracts and Insurance Futures Contracts Open NONE

Schedule DB - Part D - Section 2 - Futures Contracts and Insurance Futures Contracts Opened  $N\ O\ N\ E$ 

Schedule DB - Part D - Section 3 - Futures Contracts and Insurance Futures Contracts Terminated NONE

Schedule DB - Part E - Section 1 - Counterparty Exposure for Derivative Instruments Open  $N\ O\ N\ E$ 

				T 1 - CAS			
	1 Dopository	2 Code	3 Rate of	4 Amount of Interest Received During	5 Amount of Interest Accrued December 31 of Current Year	6 Balance	7
Bank of America	Depository Covina, CA		Interest	Year	or Guirent Year	Balance 23,614	XY
0199998 Deposits in	depositories which do not excee sitory (See instructions) - open	ed the				(1,001	
depositories		XXX	XXX				XXX
0199999. Totals - Open Depos	sitories	XXX	XXX			15,810	XXX
0299998 Deposits in	depositories which do not excee sitory (See instructions) - suspended	ed the					
depositories		XXX	XXX				XXX
0299999. Totals - Suspended		XXX	XXX				XXX
0399999. Total Cash on Depo		XXX	XXX			15,810	
0499999. Cash in Company's	Office	XXX	XXX	XXX	XXX		XXX
							+
							+
						••••••	
						••••••	
				+			+
							[
							+
						••••••	
				+	-+		+
				+	-++		.+
				+			1

	TOTALS OF DEPOSITORY BALANCES ON THE LAST DAY OF EACH MONTH DURING THE CURRENT YEAR											
1.	January		4.	April		7.	July		10.	October		
2.	February		5.	May		8.	August		11.	November		
3.	March	262,790	6.	June	920,541	9.	September	3,776	12.	December	15,810	

## **SCHEDULE E - PART 2 - CASH EQUIVALENTS**

Show Investments Owned December 31 of Current Year

1	2	3	4	5	6	7	8
Description	Code	Date Acquired	Rate of Interest	Maturity Date	6 Book/Adjusted Carrying Value	Amount of Interest Due and Accrued	Amount Received During Year
3699999 - Total Cash Equivalents							

#### ANNUAL STATEMENT FOR THE YEAR 2009 OF THE Symetra National Life Insurance Company SCHEDULE E - PART 3 - SPECIAL DEPOSITS

			JLE	E - PART 3 - SPE				
			1	2		s For the Policyholders	All Other Spe	cial Deposits
				-	3	4	5	6
	States, Etc.		Type of Deposit	Purpose of Deposit	Book/Adjusted Carrying Value	Fair Value	Book/Adjusted Carrying Value	Fair Value
1.	Alabama							
2.	Alaska	AK						
3.	Arizona	AZ						
4.	Arkansas	AR						
5.	California	CA						
6.	Colorado	CO						
7.	Connecticut							
8.	Delaware							
9.	District of Columbia							
10.	Florida						40,004	
11.	Georgia Hawaii		В	Life Insurance				
12. 13.	Idaho							
13. 14.	Illinois							
14.	Indiana							
16.	lowa							
17.	Kansas							
17.	Kentucky							
19.	Louisiana							
20.	Maine							
20.	Maryland							
21.	Massachusetts							
23.	Michigan							
24.	Minnesota							
25.	Mississippi							
26.	Missouri	MO						
27.	Montana	МТ						
28.	Nebraska	NE						
29.	Nevada	NV						
30.	New Hampshire	NH						
31.	New Jersey	NJ						
32.	New Mexico	NM	В	Life Insurance				
33.	New York	NY						
34.	North Carolina	NC	В	Life Insurance				
35.	North Dakota	ND						
36.	Ohio	OH						
37.	Oklahoma	OK	В	Life Insurance			149,081	
38.	Oregon							
39.	Pennsylvania							
40.	Rhode Island							
41.	South Carolina							
42.	South Dakota							
43.	Tennessee							
44.	Texas							
45.	Utah							
46.	Vermont		D	life Incurence				404 400
47.	Virginia		В В	Life Insurance	1,519,874	1 620 672		
48. 49.	Washington			Life Insurance				
49. 50.	Wisconsin							
50. 51.	Wyoming							
51. 52.	American Samoa							
52. 53.	Guam							
53. 54.	Puerto Rico							
55.	U.S. Virgin Islands							
56.	Northern Mariana Islands							
57.	Canada							
58.	Aggregate Alien and Other		XXX	XXX				
59.	Subtotal		XXX	XXX	1,519,874	1,639,673	848,499	909,042
	DETAILS OF WRITE-INS				,,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	-,*	,
5801.								
	Summary of remaining write-ins							
	overflow page		XXX	XXX				
5899.	Totals (Lines 5801 thru 5803 plu	is 5898)(Line 58	10.0	10.07				
	above)		XXX	XXX				

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Schedule DB - Part B - Section 2	
Schedule DB - Part B - Section 3	
Schedule DB - Part B - Verification Between Years	_
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Schedule DB - Part C - Section 2	
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-	