

**STATE OF WASHINGTON  
OFFICE OF THE INSURANCE  
COMMISSIONER**



**FINANCIAL EXAMINATION  
OF  
PEMCO LIFE INSURANCE COMPANY  
SEATTLE, WASHINGTON**

**NAIC CODE 71803  
DECEMBER 31, 2008**

**Participating States:  
Washington**

Order No. 2010-38  
PEMCO Life Insurance Company  
Exhibit A

## SALUTATION

Seattle, Washington  
February 23, 2010

The Honorable Mike Kreidler, Commissioner  
Washington State Office of the Insurance Commissioner (OIC)  
Insurance Building – Capital Campus  
302 Sid Snyder Avenue SW, Suite 200  
Olympia, WA 98504

The Honorable Alfred E. Gross, Commissioner  
Chair, NAIC Financial Condition (E) Committee  
State Corporation Commission  
Bureau of Insurance  
Commonwealth of Virginia  
PO Box 1157  
Richmond, VA 23218

The Honorable Christina Urias, Director  
NAIC Secretary, Western Zone  
Arizona Department of Insurance  
2910 North 44<sup>th</sup> Street, Suite 210  
Phoenix, AZ 85018-7256

Dear Commissioners and Director:

In accordance with your instructions and in compliance with the statutory requirements of RCW 48.03.010, an Association examination was made of the corporate affairs and financial records of

### **PEMCO Life Insurance Company**

of

Seattle, Washington

hereinafter referred to as “PLIC” or “the Company”, at its home office located 325 Eastlake Avenue East, Seattle, Washington 98109. This report is respectfully submitted showing the condition of the Company as of December 31, 2008.

**CHIEF EXAMINER'S AFFIDAVIT**

I hereby certify I have read the attached Report of the Financial Examination of PEMCO Life Insurance Company of Seattle, Washington. This report shows the financial condition and related corporate matters as of December 31, 2008.



Patrick H. McNaughton

Chief Examiner

2-23-10

Date

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## **SCOPE OF THE EXAMINATION**

This examination covers the period January 1, 2004 through December 31, 2008 and comprises a risk focused review of the books and records of the Company. The examination followed the statutory requirements contained in the Washington Administrative Code (WAC), the Revised Code of Washington (RCW), and the guidelines recommended by the National Association of Insurance Commissioners (NAIC) Financial Condition Examiners Handbook. The examination included identification and disposition of material transactions and events occurring subsequent to the date of examination through the end of field work, December 2, 2009.

Corporate records, external reference materials, and various aspects of the Company's operating procedures and financial records were reviewed and tested during the course of this examination and are commented upon in the following sections of this report. In addition, the Company's certified public accountant's (CPA's) work papers were reviewed and utilized, where possible, to facilitate efficiency in the examination.

This examination was performed in compliance with the 2009 NAIC Financial Condition Examiners Handbook which requires the examiner to consider the Company's risk management process, corporate governance structure, and control environment. The examiners utilized the information obtained during the examination to assess PLIC's overall potential risks both currently and on an on-going basis, allowing the examiners to focus on the Company's greatest areas of risk, and providing assurance on the Company's financial statements as of the examination date.

## **INSTRUCTIONS**

The examiners reviewed the Company's filed 2008 NAIC Annual Statement as part of the statutory examination. This review was performed to determine if the Company completed the NAIC Annual Statement in accordance with the NAIC Annual Statement Instructions and to determine if the Company's accounts and records were prepared and maintained in accordance with Title 48 RCW, Title 284 WAC, and the NAIC Statements of Statutory Accounting Principles (SSAP) as contained in the NAIC Accounting Practices and Procedures Manual (AP&P).

The following summarizes the exceptions noted while performing this review:

### **1. Actuarial Exceptions**

An actuarial review was performed on the Company's Statement of Actuarial Opinion (SAO), Memorandum in the Support of the Actuarial Opinion (Memorandum), and the requirements of WAC 284-74-340 as it pertains to X factors. The following discrepancies were noted in the review:

**a. Statement of Actuarial Opinion**

- i. Per RCW 48.74.025(3), each SAO requires a supporting Memorandum. PLIC's Memorandum is not consistent with the SAO. Amounts reported as tested in the SAO were not the same as the amounts reported as tested in the Memorandum.
- ii. The SAO reported the "Gross Deferred and Uncollected Premium" and not the "Net Deferred and Uncollected Premium" required by SSAP No. 61, paragraph 25, WAC 284-07-380(1)(b) and WAC 284-07-380(2)(b).

**b. Memorandum in Support of the Statement of Actuarial Opinion**

- i. PLIC's Memorandum is that of Miller & Newberg, Inc. (MNI) and not the Company's Board of Director's appointed actuary. As provided by RCW 48.74.025(3), WAC 284-07-390(1) and WAC 284-74-340(3), the opinion must be supported by a Memorandum prepared by the appointed actuary.
- ii. The anticipated mortality assumptions in the Memorandum are different from those stated by the appointed actuary for the purpose of testing mortality experience under WAC 284-74-340(3).
- iii. The documentation of expense assumptions required to be included in the Memorandum by WAC 284-07-390(2)(a)(vii) were: inconsistent (Section E.6 and E.7 do not agree); did not allow an actuary reviewing the assumptions to come to a conclusion regarding the reasonableness of the assumptions; and did not compare the lapse and mortality assumptions with the Company experience.
- iv. Extremely low mortality rates were assumed, without supporting rationale. The Memorandum does not adhere to ASOP No. 22 (3.3.3) requiring the actuary to select appropriate assumptions and provide supporting rationale for the appropriateness of the assumptions.

**c. Actuarial Opinion and Report**

- i. The appointed actuary did not opine that the mortality rates resulting from the application of X factors met the requirements of WAC 284-74-340(3)(i)(ii).
- ii. The appointed actuary did not disclose the lowest X factors used as required by WAC 284-74-340(3)(i)(ii).
- iii. The X factors used did not reflect anticipated future mortality taking into account relevant emerging experience required by WAC 284-74-340(3)(i)(ii) and did not describe the basis for determining anticipated mortality required by ASOP No. 40(4.1.2.c.1).
- iv. ASOP No. 40(4.1.2.c.2) states that the actuarial report should describe the analysis performed to evaluate the credibility of relevant, historical company experience. There was no description of the credibility of this experience, a description of related experience, or a statement that professional judgment was used.

**The Company is instructed to adhere to WAC 284-07-380, 284-07-390, 284-74-340, RCW 48.74.025 and SSAP No. 61 by preparing a SAO, a Memorandum in Support of the SAO and the requirements documented in WAC 284-74-340 regarding X factors that are consistent and contain all the required disclosures. The Company is also instructed to re-evaluate its X factors to reflect anticipated future mortality as used in the asset adequacy analysis.**

## **2. Capital Contribution**

The Company failed to update its holding company registration statement Form B by disclosing a material capital contribution of \$1,150,000 made by PEMCO Mutual Insurance Company (PMIC) to its subsidiary, PLIC, in October of 2008. The contribution exceeded more than one-half of one percent of PLIC's prior year-end admitted assets. Per RCW 48.31B.025(2)(c)(iii), Form B must be updated for transactions not in the ordinary course of business between affiliates. Per WAC 284-07-050(5)(a) the Company did not properly file its NAIC Quarterly Statement when it failed to disclose the capital contribution as a subsequent event in the Notes of its quarterly statement for the period ending September 30, 2008.

**The Company is instructed per RCW 48.31B.025(2)(c)(iii) to disclose in its registration statement all material changes or additions within fifteen days after the end of the month in which it learns of any change or addition. Also, the Company is instructed to comply with WAC 284-07-050(5)(a) by filing its NAIC Quarterly Statement in the general form and context approved by the NAIC.**

## **3. Custodial Agreement Deficiencies**

The Company responded in its 2008 NAIC Annual Statement General Interrogatories 26.01 that its custodial agreements complied with the FCEH. However, they did not contain several provisions required by the FCEH. RCW 48.05.250 requires a company to file a true statement of its financial condition, transactions, and affairs.

**The Company is instructed to comply with RCW 48.05.250 by filing a true statement of its financial condition, transactions and affairs and to follow the NAIC Annual Statement Instructions and the AP&P, as required by WAC 284-07-050(2). The Company is also instructed to execute a revised or amended custodial agreement that complies with the FCEH.**

## **4. Annual Statement Error**

The Company records amounts owed to the parent for general insurance expenses as general insurance expenses due or accrued instead of payable to parent. This is in violation of the NAIC Annual Statement Instructions and the AP&P. The Company should report the expenses as paid and should only recognize a payable owed to the parent.

**The Company is instructed to comply with RCW 48.05.250 by filing a true statement of its financial condition, transactions and affairs and to follow the NAIC Annual Statement Instructions and the AP&P, as required by WAC 284-07-050(2).**

## **COMMENTS AND RECOMMENDATIONS**

### **1. Computer Administration System Access**

The Company identified six (6) PLIC employees who have access to the Genelco automated system. Each of these employees has full access within the system. The job functions of these employees include policy administration, claims and accounting. The full access level allows the user to process new life accounts, process claims for an account, and make data changes to an account. The full access level does not provide any segregation of duties between these job functions.

**It is recommended user access levels for the Genelco System be changed so that there is restricted access between the policy administration, claims and accounting functions. The assigned access should restrict user access to their essential functions.**

### **2. Segregation of Duties**

The majority of the financial accounting process is performed by two employees. This, along with the computer system user access recommendation identified above, creates a control environment susceptible to undetected errors and activity.

**It is recommended the Company review controls and segregation of duties to identify processes to enhance controls and mitigate the risk of errors and inappropriate activity.**

### **3. Internal Audit Department**

During the period covered by the examination, the internal audit department of PMIC did not perform any operational audits of PLIC.

**Based on the weak controls identified at PLIC, it is recommended that the internal audit department evaluate the frequency of internal audits. (See Recommendations No. 1 and 2.)**

#### 4. Conflict of Interest Disclosures

PLIC's conflict of interest policy requires that conflict of interest disclosures be updated annually. The Company was unable to provide the current conflict of interest disclosure for one of the officers.

**In order to demonstrate compliance with RCW 48.05.370, it is recommended that the Company obtain and review conflict of interest declarations from appropriate personnel and to report the results to the Company's Board of Directors, as required by the Company's conflict of interest policy.**

### COMPANY PROFILE

#### **Company History**

PLIC is a Washington corporation organized as a stock life insurance company on May 27, 1963. Following a dividend of 100% of its common stock, the Company became a wholly-owned subsidiary of PMIC, on December 1, 2004. Prior to that, the Company was a wholly-owned subsidiary of affiliate, PEMCO Corporation.

#### **Territory and Plan of Operation**

The Company is licensed to do business in the states of Washington and Oregon and its Certificates of Authority were issued on June 11, 1963 and February 11, 2004, respectively. It is authorized to write life and disability insurance

PLIC employs life sales specialists and in addition, the Company uses independent and direct agents of the parent, PMIC, to acquire new business in Washington.

#### **Growth of Company**

The Company's growth, as reported in its NAIC Annual Statements, is illustrated below:

	<u>Assets</u>	<u>Liabilities</u>	<u>Capital and Surplus</u>
2008	\$7,221,236	\$4,012,857	\$3,208,379
2007	6,625,832	3,452,451	3,173,381
2006	6,889,127	3,135,993	3,753,134
2005	7,261,470	2,670,526	4,590,944
2004	7,641,133	2,296,236	5,344,897

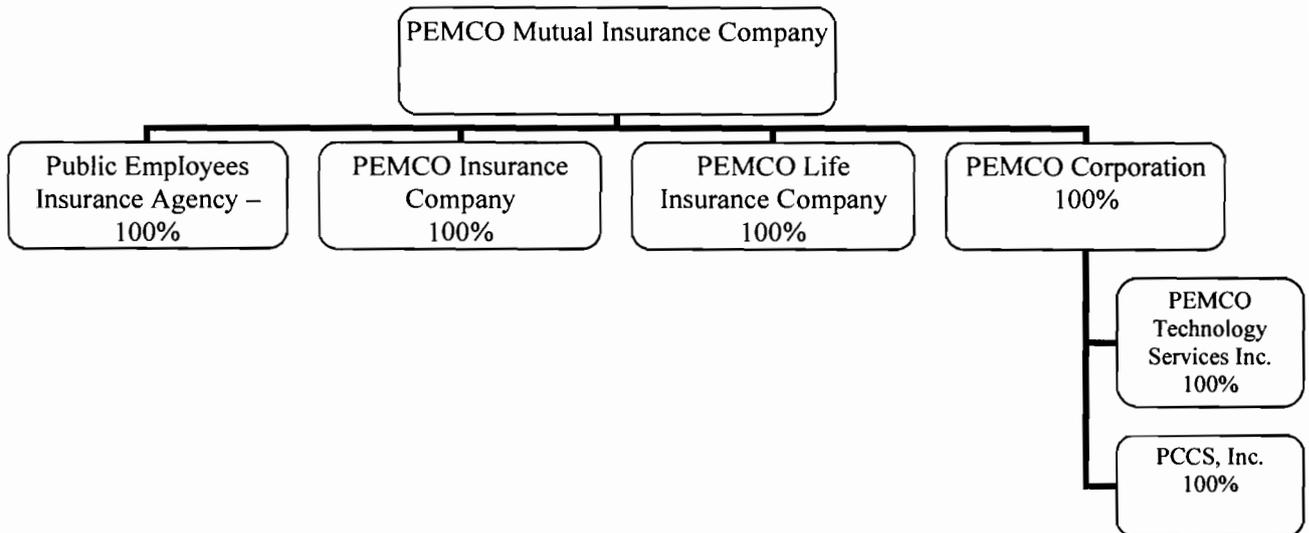
**Net Investment**

<u>Premiums</u>	<u>Income</u>	<u>Death Benefits</u>
\$1,706,438	\$228,030	\$535,840
1,616,134	278,893	633,052
1,523,061	273,871	652,136
1,579,495	262,113	341,147
1,531,449	254,749	264,852

**AFFILIATED COMPANIES**

PLIC is a wholly-owned subsidiary of PEMCO Mutual Insurance Company (PMIC), a mutual property and casualty insurer in the state of Washington. PMIC writes multiple-line property and casualty coverage.

The following is an abbreviated organizational chart:



**Intercompany Contracts**

The Company was a party to intercompany contracts with PMIC and affiliates. Significant agreements in force at December 31, 2008 were: shared services agreement, used to define responsibilities regarding payment of the 401K Plan expenses and to define the applicable cost allocation methodology for the companies; and the cost sharing agreement, used for allocation of operational expenses performed for affiliates by PMIC.

## MANAGEMENT AND CONTROL

### **Board of Directors (BOD)**

As of December 31, 2008:

Stan McNaughton	Chairman
Diane Beckley	
Rodney Brooks	
Hugh McGough	
Steven Ricco	

### **Officers**

As of December 31, 2008:

Stan McNaughton	President and CEO
Steven Ricco	Vice President, Treasurer, and CFO
Rodney Brooks	Vice President and CMO
Denice Town	Secretary

### **Committees**

The BOD has the authority to appoint such additional standing or temporary committees as the Board may deem necessary. The only active committee during the period of the examination was the Investment Committee.

### **Conflict of Interest**

All affiliated companies have a combined Conflict of Interest and Confidentiality Policy which requires completion of a conflict of interest statement by officers, directors, and employees annually. All are required to promptly disclose relevant outside interests, memberships, associations and affiliations. The Company could not provide the 2008 conflict of interest disclosure for one officer. (See Comment and Recommendation No. 4.)

### **Fidelity Bond and Other Insurance**

The Company has a fidelity institution bond with Hartford Fire Insurance Company with a single loss limit of liability of \$5,000,000 and a single loss deductible of \$25,000. This bond covers all Company employees. The Company's fidelity coverage meets the NAIC's minimum recommended amount.

### **Officers', Employees', and Agents' Welfare and Pension Plans**

The Company sponsors a 401(k) Plan. This is a defined contribution retirement plan and substantially all employees are eligible to participate. Eligible employees may contribute up to \$15,500 (in 2008) of their salary to the plan, which is subject to a two-for-one Company match of the first 6%.

The Company offers a non-qualified deferred compensation plan for certain senior executives and directors of the Company.

In addition, the Company provides certain medical and dental insurance coverage for eligible employees, directors, and retirees.

### **CORPORATE RECORDS**

The Articles of Incorporation and By-Laws were not amended during the years under examination.

The BOD was active during the examination period. Meetings were well attended and the minutes demonstrated that the BOD members were actively involved in the administration of the Company's affairs. All meetings were documented in writing, noting discussion items and specific actions taken.

### **MORTALITY AND LOSS**

The reserving function of PLIC, with respect to the 2008 NAIC Annual Statement, was a key activity of the Company and its inherent risk was determined to be low. The inherent risk was mitigated by several factors: reserve analysis performed by the external CPA; the Company's internal audit review of reserves; the reinsurers calculation of the reserve credit; and the calculation of reserves by the Consulting Actuary

Since the inherent risk was determined to be low and was mitigated by the work performed by professionals, the actuarial review performed by the OIC actuary was limited to a review of the Company's Asset Adequacy Analysis for reasonableness and compliance with actuarial standards and Washington Statutes and a review of the Actuarial Opinion and Memorandum for reasonableness and compliance with Washington Statutes. During the OIC actuary's review, several discrepancies were noted. (See Instruction No. 1.)

### **REINSURANCE**

Reinsurance agreements were found to be in compliance with Washington State reinsurance statutes. All of the reinsurers are authorized in the state of Washington. The treaties are properly classified in Schedule S of the 2008 NAIC Annual Statement. The Company has controls in place to monitor its reinsurance program including the financial condition of the reinsurers. In addition, PLIC utilizes the services of a reinsurance intermediary to solicit, negotiate, and place reinsurance cessions on its behalf.

## **ACCOUNTING RECORDS AND INFORMATION SYSTEMS**

The Company maintains its accounting records on a Statutory Accounting Practices (SAP) basis for NAIC Annual Statement reporting. The Company is audited annually by the certified public accounting firm of PriceWaterhouseCoopers. The Company received an unqualified opinion for all years under review. The Company's accounting procedures, internal controls, and transaction cycles were reviewed during the planning and testing phase of the examination.

PLIC uses the Genelco automated system for life policy administration, policy premiums, policy payments and claims processing. The Genelco System lacks the appropriate user access levels and internal controls to provide proper separation of duties. All users have been assigned full access and have the ability to create and modify records related to policy administration and claims. (See Comment and Recommendation No. 1.)

The management of the Company is sufficiently knowledgeable of the information systems (IS) process. Systems development, acquisition, and maintenance controls were evaluated to gain assurance that appropriate controls are in place. Operations and application controls were reviewed to determine the type of hardware installed; operating systems and proprietary software in use; back up and recovery facilities employed; and the controls exercised to maintain data security. The Company's IS Department has the ability to recover from an incident or disaster and has documented these procedures in a detailed, written disaster recovery plan.

## **SUBSEQUENT EVENTS**

1. On October 16, 2009, the Company borrowed \$500,000 from PMIC. This was a short-term loan and was re-paid in full on October 28, 2009. Form D was filed with the OIC on August 31, 2009.
2. On November 10, 2009, the Company received a capital contribution of \$1,650,000 from PMIC to maintain its surplus level of approximately \$3.5 million. An amendment to the 2008 Form B was filed with the OIC on November 13, 2009.

## **FOLLOW UP ON PREVIOUS EXAMINATION FINDINGS**

All previous report instructions and comments have been addressed or corrected.

## **FINANCIAL STATEMENTS**

Assets, Liabilities, Surplus and Other Funds  
Summary of Operations  
Reconciliation of Surplus

**PEMCO LIFE INSURANCE COMPANY**  
**ASSETS, LIABILITIES, SURPLUS AND OTHER FUNDS**  
**DECEMBER 31, 2008**

	<u>BALANCE PER COMPANY</u>	<u>EXAMINATION ADJUSTMENTS</u>	<u>BALANCE PER EXAMINATION</u>
<b>Assets</b>			
Bonds	\$4,316,416	\$0	\$4,316,416
Preferred stocks	103,900		103,900
Cash and short term investments	867,763		867,763
Contract loans	46,875		46,875
Subtotals, cash and invested assets	5,334,954	0	5,334,954
Investment income due and accrued	55,589		55,589
Premiums and considerations:			
Uncollected premiums and agents' balance in course of collection	46,033		46,033
Deferred premiums, agents' balances and installments booked but deferred and not yet due	1,664,948		1,664,948
Amount recoverable from reinsurers	66,667		66,667
Current federal & foreign income tax recoverable	17,400		17,400
Receivables from parent, subsidiaries, and affiliates	35,645		35,645
Total assets excluding separate accounts, segregated	7,221,236	0	7,221,236
<b>Total Assets</b>	<b>\$7,221,236</b>	<b>\$0</b>	<b>\$7,221,236</b>
<b>Liabilities</b>			
Aggregate reserve for life contracts	\$3,435,627	\$0	\$3,435,627
Contract claims - life	118,069		118,069
Premiums and annuity considerations received in advance	57,398		57,398
Commissions to agents due and accrued	39,018		39,018
General expenses due or accrued	322,850		322,850
Taxes, licenses and fees due or accrued	11,596		11,596
Payable to parent, subsidiaries and affiliates	26,772		26,772
Aggregate write-ins for liabilities	1,527	0	1,527
Total liabilities excluding separate Account	4,012,857		4,012,857
<b>Total Liabilities</b>	<b>4,012,857</b>	<b>0</b>	<b>4,012,857</b>
Common capital stock	125,000		125,000
Gross paid in and contributed	1,225,000		1,225,000
Unassigned funds (surplus)	1,858,379		1,858,379
Capital and surplus	3,208,379	0	3,208,379
<b>Total Liabilities, Surplus, and Other Funds</b>	<b>\$7,221,236</b>	<b>\$0</b>	<b>\$7,221,236</b>

**PEMCO LIFE INSURANCE COMPANY**  
**SUMMARY OF OPERATIONS**  
**YEAR ENDED DECEMBER 31, 2008**

	<u>BALANCE PER COMPANY</u>	<u>EXAMINATION ADJUSTMENTS</u>	<u>BALANCE PER EXAMINATION</u>
<b>Income</b>			
Premiums and annuity considerations	\$1,706,438	\$0	\$1,706,438
Net investment income	228,030		228,030
Amortization of interest maintenance reserve	(679)		(679)
Commissions and expense allowance on reinsurance	669,856		669,856
<b>Total Income</b>	<u>2,603,645</u>	<u>0</u>	<u>2,603,645</u>
<b>Benefits</b>			
Death benefits	535,840		535,840
Disability benefits	3,557		3,557
Surrender benefits	5,938		5,938
Increase in aggregate reserves for life and health policies and contracts	514,354		514,354
<b>Total Benefits</b>	<u>1,059,689</u>	<u>0</u>	<u>1,059,689</u>
<b>Expenses</b>			
Commissions on premiums and annuity considerations	362,606		362,606
General insurance expenses	1,818,178		1,818,178
Insurance taxes, licenses and fees, excl. federal income taxes	155,315		155,315
Increase in loading	5,547		5,547
Premiums over and short	8,856		8,856
<b>Total Expenses and Benefits</b>	<u>3,410,191</u>	<u>0</u>	<u>3,410,191</u>
Net gain from operations before dividends to policyholders and income taxes	(806,546)		(806,546)
Federal and foreign income taxes incurred (excluding tax on capital gains)	27,517		27,517
Net gain from operations after dividends to policy holders and federal income taxes and before realized capital gains or losses	(834,063)		(834,063)
Net realized capital gains (losses) (excluding gains (losses) transferred to the Interest Maintenance Reserve)	(229,350)		(229,350)
<b>Net Income</b>	<u>(\$1,063,413)</u>	<u>\$0</u>	<u>(\$1,063,413)</u>
<b>Capital and Surplus Account</b>			
Capital and Surplus, December 31, Previous Year	\$3,173,381	\$0	\$3,173,381
Net income	(1,063,413)		(1,063,413)
Change in net deferred income tax	395,325		395,325
Change in non-admitted assets and related items	(466,038)		(466,038)
Change in asset valuation reserve	13,447		13,447
Surplus adjustment - paid in	1,150,000		1,150,000
Aggregate write-ins	5,677		5,677
Net change in capital and surplus for the year	<u>34,998</u>		<u>34,998</u>
Capital and Surplus, December 31, 2008	<u>\$3,208,379</u>	<u>\$0</u>	<u>\$3,208,379</u>

**PEMCO LIFE INSURANCE COMPANY  
FIVE YEAR RECONCILIATION OF SURPLUS  
FOR THE YEARS ENDED DECEMBER 31**

	<u>2008</u>	<u>2007</u>	<u>2006</u>	<u>2005</u>	<u>2004</u>
<b>Capital and Surplus, December 31, prior year</b>	<b>\$3,173,381</b>	<b>\$3,753,134</b>	<b>\$4,590,944</b>	<b>\$5,344,897</b>	<b>\$4,965,816</b>
Net income	(1,063,413)	(544,993)	(669,836)	(384,662)	(53,734)
Change in net deferred income tax	395,325	206,129	86,748	180,362	73,320
Change in non-admitted assets and related items	(466,038)	(242,108)	34,475	(268,248)	(49,849)
Change in reserve on account of change in valuation basis (increase) or decrease	0	0	0	(66,466)	408,174
Change in asset valuation reserve	13,447	1,219	(14,666)	13,177	1,170
Cumulative effect of changes in accounting principles	0	0	0	2,991	0
Surplus Adjustment: Paid In	1,150,000	0	0	0	0
Dividends to Stockholders	0	0	(347,574)	0	0
Aggregate write-ins for gains and losses in surplus	5,677	0	73,043	(231,107)	0
Net change in capital and surplus	<u>34,998</u>	<u>(579,753)</u>	<u>(837,810)</u>	<u>(753,953)</u>	<u>379,081</u>
<b>Capital and Surplus, December 31, current year</b>	<b><u>\$3,208,379</u></b>	<b><u>\$3,173,381</u></b>	<b><u>\$3,753,134</u></b>	<b><u>\$4,590,944</u></b>	<b><u>\$5,344,897</u></b>

**NOTES TO FINANCIAL STATEMENTS**

**None**

## **ACKNOWLEDGMENT**

The cooperation and assistance of the officers and employees of the Company during the examination are hereby acknowledged.

In addition to the undersigned, Michael V. Jordan, CPA, CFE, MHP, Assistant Chief Examiner; Timoteo L. Navaja, CFE, CIE, Property and Casualty Field Supervisor; Jerry Epler, CPA, CFE, ABV; John Jacobson, AFE, CISA, AES, Automated Examination Specialist; Roy Olson, FSA, MAAA, Life Actuary; Albert Karau, Jr., CPA, CFE, FLMI, Financial Examiner, and Zairina Othman, Financial Examiner, all from the Washington State Office of the Insurance Commissioner, participated in the examination and in the preparation of this report.

Respectfully submitted,

A handwritten signature in cursive script that reads "Susan Campbell".

Susan Campbell, CPA, FLMI, CFE, ARA  
Reinsurance Specialist  
Examiner in Charge  
State of Washington

