



OFFICE OF
INSURANCE COMMISSIONER

In the Matter of)	No. 14-169
)	
The Financial Examination of)	FINDINGS, CONCLUSIONS,
SEATTLE SYMPHONY FOUNDATION)	AND ORDER ADOPTING REPORT
)	OF EXAMINATION

A Domestic Charitable Gift Annuity Issuer.

BACKGROUND

An examination of the financial condition of **SEATTLE SYMPHONY FOUNDATION** (SSF) as of August 31, 2013 was conducted by examiners of the Washington State Office of the Insurance Commissioner (OIC). SSF holds a Washington certificate of exemption to issue charitable gift annuities. This examination was conducted in compliance with the laws and regulations of the state of Washington and in accordance with the procedures promulgated by the National Association of Insurance Commissioners and the OIC.

The examination report with the findings (see Exhibit A) was transmitted to SSF for its comments on July 31, 2014. SSF's response to the report is attached to this order (see Exhibit B) only for the purpose of a more convenient review of the response.

The Commissioner or a designee has considered the report, the relevant portions of the examiners' work papers, and the submissions by SSF.

Subject to the right of SSF to demand a hearing pursuant to Chapters 48.04 and 34.05 RCW, the Commissioner adopts the following findings, conclusions, and order.

FINDINGS

Findings in Examination Report. The Commissioner adopts as findings the findings of the examiners as contained in pages 1 through 6 of the report.



CONCLUSIONS

It is appropriate and in accordance with law to adopt the attached examination report as the final report of the financial examination of **SEATTLE SYMPHONY FOUNDATION** and to order SSF to take the actions described in the Comments and Recommendations section of the report. The Commissioner acknowledges that SSF may have implemented the Comment and Recommendation prior to the date of this order. The Comment and Recommendation in the report is an appropriate response to the matters found in the examination.

ORDER

The examination report as filed, attached hereto as Exhibit A, and incorporated by reference, is hereby ADOPTED as the final examination report.

SSF is ordered as follows, this being the Comment and Recommendation contained in the examination report on page 1.

1. SSF is ordered to consider implementing a conflict of interest policy and developing a standard conflict of interest statement. Key employees should be required to review the policy and submit a signed statement on an annual basis. Comments and Recommendations 1, Examination Report, page 2.

ENTERED at Olympia, Washington, this 9th day of September, 2014.



MIKE KREIDLER
Insurance Commissioner

Miller, Susan (OIC)

From: Maureen Melville [Maureen.Melville@SeattleSymphony.org]
Sent: Wednesday, August 20, 2014 5:02 PM
To: Miller, Susan (OIC)
Cc: Karau, Bert (OIC); Kreske, Charles (OIC)
Subject: Seattle Symphony Foundation Audit Response
Attachments: SSF IRS Determination Letter 1987.pdf; SSF OIC Audit Report for Reply.xlsx

(Ms. Miller, Please forward this to Mr. Michaels)

Dear Mr. Michaels,

In response to your audit report, I have a few minor revisions.

- 1) Page 1, Organization Profile, the date the organization was established should be 1987. See attached IRS form.
- 2) Page 2, Schedule 2. There are some discrepancies in the way that transfers are listed. See the attached Excel report that has the transfers listed separately from revenue for each year. The net asset numbers are fine. Schedule 1 is also OK.

For the comment on the conflict of interest form, we do have one for the Symphony board members. We are implementing one this year for the SSF independent board members.

Let me know if you need more of an explanation for Schedule 2.

Maureen Campbell Melville | Vice President of Finance | SEATTLE SYMPHONY
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