



Please Reply to: PO Box 40259  
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October 25, 2012

OFFICE OF  
INSURANCE COMMISSIONER

Patricia D. Petersen, JD, Chief Hearing Officer  
Office of the Insurance Commissioner, Hearings Unit  
PO Box 40255  
Olympia, WA 98504-0255  
5000 Capitol Boulevard  
Tumwater, WA 98501

Patricia D. Petersen  
Chief Hearing Officer

Re: Form A Merger Filing dated September 28, 2012 – Proposed Merger of PEMCO Life Insurance Company with and into Sagicor Life Insurance Company

Dear Ms. Petersen:

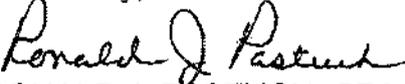
Attached please find the Form A filing regarding the proposed merger with a domestic insurer. The merger documents describe the proposed merger transaction between PEMCO Life Insurance Company, a Washington-domiciled stock insurer, and Sagicor Life Insurance Company, a Texas-domiciled stock insurer.

The proposed merger transaction comes at the request of both PEMCO Life Insurance Company and Sagicor Life Insurance Company. Sagicor Life Insurance Company is the parent company of PEMCO Life Insurance Company through its recent acquisition of control which was approved by you during September 2012. Sagicor Life Insurance Company now owns all of PEMCO Life Insurance Company's common stock. Both companies request a decision be rendered on this matter on or before December 31, 2012.

The Company Supervision division is satisfied that the merger filing is complete, and requests that a hearing be scheduled in this matter according to RCW 48.31B.015. Ms. Robin Aronson is the OIC staff attorney assigned to this case.

If you have any questions, please call me at 360-725-7211 or Ms. Aronson at 360-725-7181.

Yours truly,

  
RONALD J. PASTUCH, CPA  
Holding Company Manager  
Company Supervision Division  
E-Mail: RonP@oic.wa.gov

Cc: James T. Odiome, CPA, JD, Deputy Insurance Commissioner  
Robin Aronson, Staff Attorney

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