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**Filing Fee**

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608  
FEIN: 91-0742147

**Item 2 – Filing Fee**

Enclosed are the following filing fees:

- \$50 check made payable to the Iowa Secretary of State for filing of the Amended and Restated Articles of Incorporation
- \$75 check made payable to the Iowa Insurance Division for filing of the Amended and Restated Articles of Incorporation and amending the Certificate of Authority.

Symetra Financial  
IOWSEC01 IOWA SECRETARY OF STATE

Check Number 0003018164  
Check Date 01/09/2014

Invoice Number	Invoice Date	Description	Amount	Discount	Paid Amount
010814	01/08/2014	FILING OF AMENDED ARTICLES SLI	\$50.00	\$0.00	\$50.00

TOTALS: \$50.00 \$0.00 \$50.00

W-765NBR (04/12)

WARNING!! HOLD PAPER UP TO THE LIGHT AND LOOK FOR VISIBLE RED & BLUE PAPER FIBERS AND TRUE "VERIFY FIRST" WATERMARK. IF NOT PRESENT DO NOT CASH.



777 108th Avenue NE  
Suite 1200  
Bellevue, WA 98004-5135

BANK OF AMERICA  
Controlled Disbursement Account  
Bank of America, N.A.  
Atlanta, GA

64-1278/611

0003018164

NOT VALID 6 MONTHS AFTER  
DATE  
Jan 9, 2014

Pay Fifty Dollars And 00 Cents

AMOUNT  
\$50.00

to the Order of:

IOWA SECRETARY OF STATE

LUCAS BUILDING FLR 1  
321 E 12TH ST  
DES MOINES, IA 50319

Tamper-Safe

Patent #5,772,248

DO NOT CASH UNLESS THE ORIGINAL CHECK CONTAINS A BLUE BACKGROUND PRINTED WITH WHITE LOGO AND GRAY BORDER ON WHITE PAPER.

⑈0003018164⑈ ⑆0611127881⑆ 329 911 4787⑈

Symetra Financial  
IOWSTA01 IOWA DIVISION OF INSURANCE

Check Number 0003018155  
Check Date 01/09/2014

Invoice Number	Invoice Date	Description	Amount	Discount	Paid Amount
010814	01/08/2014	NAIC 68608	\$75.00	\$0.00	\$75.00

TOTALS: \$75.00 \$0.00 \$75.00

W-765NBR (04/12)

WARNING!! HOLD PAPER UP TO THE LIGHT AND LOOK FOR VISIBLE RED & BLUE PAPER FIBERS AND TRUE "VERIFY FIRST" WATERMARK. IF NOT PRESENT DO NOT CASH.

**SYMETRA**  
RETIREMENT | BENEFITS | LIFE

777 108th Avenue NE  
Suite 1200  
Bellevue, WA 98004-5135

**BANK OF AMERICA**  
Controlled Disbursement Account  
Bank of America, F.A.  
Atlanta, GA

64-1278/611

0003018155

NOT VALID 6 MONTHS AFTER  
DATE  
Jan 9, 2014

Pay Seventy Five Dollars And 00 Cents  
to the Order of:

**IOWA DIVISION OF INSURANCE**  
TWO RUAN CENTER  
601 LOCUST ST FLR 4  
DES MOINES, IA 50309-3738

TamperSafe® Patent #5,712,248

*Z M M*

AMOUNT \$75.00

DO NOT CASH UNLESS THE ORIGINAL CHECK CONTAINS A BLUE BACKGROUND PRINTED WITH WHITE LOGO AND GRAY BORDER ON WHITE PAPER.

⑈0003018155⑈ ⑆061112788⑆ 329 911 4787⑈

## Minimum Capital and Surplus Requirements

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608

FEIN: 91-0742147

**Item 3 – Minimum Capital and Surplus Requirements**

As of December 31, 2012, the Applicant had capital equal to \$5,000,000 (represented by 20,000 issued and outstanding common shares at par value equal to \$250.00), gross paid-in and contributed surplus of \$645,323,888, and unassigned funds (surplus) of \$1,262,295,425, for total capital and surplus equal to \$1,907,619,313. This exceeds the required minimum of \$5,000,000 in capital and surplus required by Iowa Code § 508.5.

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## Statutory Deposit Requirements

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608

FEIN: 91-0742147

**Item 4 – Statutory Deposit Requirements**

An original certificate of deposit from the Washington Office of the Insurance Commissioner is included as Item 4.

In addition, please note that in accordance with Iowa Code § 511.8 and implementing regulations, the Applicant will, upon redomestication, make a deposit of securities in custodian banks or clearing corporations in order to satisfy its legal reserve requirement.

STATE OF WASHINGTON



OFFICE OF  
INSURANCE COMMISSIONER

No. 1271

*I, MIKE KREIDLER, State Insurance Commissioner, do hereby certify that I am the state official charged with the general control and supervision of all insurance business (except State Workers' Compensation) transacted in the State of Washington and charged with the administration of the laws relating to insurance in said jurisdiction, and that this office is a department of record, having custody of original documents.*

*I FURTHER CERTIFY That as of December 31, 2012, SYMETRA NATIONAL LIFE INSURANCE COMPANY, Bellevue, Washington has \$1,563,952.88 on deposit in the State of Washington. This deposit is held in trust and safekeeping in the depository bank, US Bank, under a tripartite agreement by and between the Insurance Commissioner, the Bank, and the Company for the benefit of all policyholders and obligees of the Company.*

IN WITNESS WHEREOF, *I have hereunto set my hand and affixed the official seal of the Insurance Commissioner of the State of Washington, this 16<sup>th</sup> day of December 2013*

MIKE KREIDLER  
Insurance Commissioner

By: *Ronald J. Pastuch*  
Acting Deputy Insurance Commissioner



## Name Approval

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608

FEIN: 91-0742147

**Item 5 – Name Approval**

This Item is not applicable, as the Applicant will retain the name “Symetra Life Insurance Company.”

**Narrative**

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608  
FEIN: 91-0742147

**Item 6 – Plan of Operation**

The Applicant has attached the following materials in response to Item 6 of the Application:

- Exhibit 6-A A brief narrative supporting the Application, including the Applicant's reasons for seeking to redomesticate.
- Exhibit 6-B Pro-forma financial statements/projections in the form provided by the NAIC.
- Exhibit 6-C Completed Questionnaire on Form 8, together with exhibits referenced therein.

**Narrative in Support of the Redomestication Application of  
Symetra Life Insurance Company**

Symetra Life Insurance Company ("Applicant") is a direct, wholly-owned subsidiary of Symetra Financial Corporation ("Symetra Financial") (NYSE: SYA), which is a diversified financial services company based in Bellevue, Washington. In business since 1957, Symetra Financial and its subsidiaries provide employee benefits, annuities and life insurance through a national network of benefit consultants, financial institutions, and independent agents.

At present, Applicant is a Washington domiciled life insurance company licensed in 49 states and the District of Columbia. The Applicant's principal products include medical stop-loss insurance, fixed deferred annuities, single premium immediate annuities, universal life insurance, including single-premium life and bank-owned life insurance, and term life insurance. The Applicant distributes its products through a national network of benefits consultants, financial institutions and independent agents.

Symetra Financial believes that the redomestication of Applicant to Iowa will further its efforts to grow and to diversify its product portfolio and risk profile, as the Applicant will benefit from the sophisticated and robust statutes and regulations governing the life insurance industry in Iowa. Specifically, Iowa supports the following initiatives, among others, that are relevant to the life insurance industry:

- the financing of certain statutory reserve amounts associated with universal life insurance products with secondary guarantees;
- the implementation of principle-based reserving;
- the enforcement of termination and netting provisions under qualified financial contracts entered into by life insurance companies; and
- the implementation of reinsurance collateral reform.

In addition, Applicant's status as an Iowa-domiciled insurance company will generate savings in retaliatory taxes which the Applicant would otherwise pay on premiums written in other jurisdictions.

Following the redomestication, Applicant will open an office in Des Moines, Iowa. Applicant anticipates staffing the office with 20-40 employees over the next two to four years.

Pro Forma

Applicant Name: Symetra Life Insurance Company

NAIC No. 68608

FEIN: 91-0742147

**Exhibit 6-B Pro Forma Financial Information**

Pro forma financial statements are included as Exhibit 6-B of the application.