

MIKE KREIDLER
STATE INSURANCE COMMISSIONER

STATE OF WASHINGTON

Phone: (360) 725-7000
www.insurance.wa.gov



OFFICE OF
INSURANCE COMMISSIONER

FILED

2014 APR 28 A 10:15

OIC HEARINGS UNIT
PATRICIA PETERSEN
CHIEF HEARING OFFICER

April 24, 2014

Patricia Petersen, Chief Hearing Officer
Office of the Insurance Commissioner, Hearings Unit
P.O. Box 40255
Olympia, WA 98504-0255
5000 Capitol Blvd.
Tumwater, WA 98501

Re: Redomestication applications for Symetra Life Insurance Company and Symetra National Life Insurance Company

Dear Ms. Petersen:

Attached please find the redomestication applications and associated supplementary documents for Symetra Life Insurance Company ("Symetra Life") and Symetra National Life Insurance Company ("Symetra National"). The applicants have proposed to transfer their state of domicile from Washington to Iowa.

Symetra Life and Symetra National are domestic Washington companies admitted in 1957 and 1979 respectively, to transact life and disability insurances. As set forth in the applications, the companies *"believe that redomestication to Iowa will further our efforts to grow and diversify our product portfolio and risk profile by permitting us to take advantage of the statutes and regulations governing the life insurance industry in Iowa, including Iowa's legislation that allows the enforcement of derivative netting provisions in the event of insurer insolvency."*

The applicants requested an effective date of redomestication no later than July 1, 2014.

The Company Supervision Division is satisfied that the redomestication applications are complete and requests that a hearing be scheduled in this matter as soon as possible. Ms. Andrea Philhower, OIC Staff Attorney, is assigned to this case.

If you have any questions, please call me at 360-725-7210 or Ms. Philhower at 360-725-7063.

Sincerely,

A handwritten signature in cursive script that reads "Gayle Pasero".

Gayle Pasero, CPCU
Company Licensing Manager

Cc: Andrea Philhower, Bill Michels, Andrew Oberdeck

David S. Goldstein
Senior Vice President, General Counsel and Secretary
Symetra Financial Corporation
777 108th Avenue NE, Suite 1200
Bellevue, WA 98004-5135
Phone 425.256.8021
david.goldstein@symetra.com



February 6, 2014

FF 2/10/2014

RECEIVED

FEB 7 2014

WASHINGTON STATE INSURANCE DIVISION

The Hon. Mike Kreidler
Insurance Commissioner
Washington State Office of the Insurance Commissioner
5000 Capitol Blvd. SE,
Tumwater, Washington 98501

Re: Redomestication of Symetra National Life Insurance Company

Dear Commissioner Kreidler:

With reference to our correspondence of January 14, 2014 in which we officially requested to transfer the domicile of (or "redomesticate") Symetra Life Insurance Company and Symetra National Life Insurance Company, enclosed herewith is a copy of the UCAA Primary Application for Redomestication of Symetra National Life Insurance Company, express mailed to the Iowa Insurance Division on February 6, 2014 and which is to be filed upon receipt (the "Application"). Except with respect to those materials identified in Schedule I (attached hereto), the enclosed Application is identical to that which will be filed with the Iowa Insurance Division.

We have also enclosed an extra copy of this letter and a return envelope. We kindly request that you file stamp this letter and return at your convenience.

If you have any questions regarding this request, please do not hesitate to contact me.

Respectfully submitted,

David S. Goldstein

Encl.

cc: James T. Odiorne
Thomas M. Marra
Margaret Meister

David S. Goldstein
Senior Vice President, General Counsel and Secretary
Symetra Financial Corporation
777 108th Avenue NE, Suite 1200
Bellevue, WA 98004-5135
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david.goldstein@symetra.com



January 14, 2014

The Hon. Mike Kreidler
Insurance Commissioner
Washington State Office of the Insurance Commissioner
5000 Capitol Blvd. SE,
Tumwater, Washington 98501

RECEIVED

JAN 15 2014

INSURANCE COMMISSIONER
COMPANY SUPERVISION

Re: Redomestication of Symetra Life Insurance Company

Dear Commissioner Kreidler:

Please accept this letter as the official request pursuant to Washington Revised Code §48.07.210(2) to transfer the domicile of (or “redomesticate”) Symetra Life Insurance Company (“Symetra Life”) and Symetra National Life Insurance Company (“Symetra National”), each a Washington stock insurance company (collectively, the “Applicants”), to the state of Iowa.

As further set forth in the Application, we believe that the redomestication of the Applicants to Iowa will further our efforts to grow and to diversify Symetra’s product portfolio and risk profile. Following the redomestication, Symetra will maintain its corporate headquarters in Bellevue, Washington, which includes nearly 900 employees in the company’s home office. In this regard, please note that Symetra Life recently renewed its lease for its home office space in downtown Bellevue through July 2025.

Please be advised that, simultaneously with the submission of this request to redomesticate, we have submitted a UCAA Primary Application for Redomestication on behalf of Symetra Life Insurance Company (the “Application”) to the Iowa Insurance Division (the “Iowa Division”). Except with respect to those materials identified in Schedule I (attached hereto), we have enclosed a copy of the Application filed with the Iowa Division in support of this request to redomesticate. In addition, please note that as Symetra National is not currently licensed in the state of Iowa, we have submitted a UCAA Expansion Application (the “Expansion Application”) to the Iowa Division on behalf of Symetra National, and will submit a UCAA Primary Application for Redomestication on behalf of Symetra National to the Iowa Division promptly following the Iowa Division’s approval of the Expansion Application. We will provide this Office with a copy of the UCAA Primary Application for Redomestication on behalf of Symetra National upon its filing with the Iowa Division.

The Applicants respectfully request that the transfer of their domiciles to Iowa be effective no later than April 30, 2014.

The Hon. Mike Kreidler
Washington Insurance Commissioner
January 14, 2014
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Please let us know at your earliest convenience if a public hearing will be required with respect to this matter and whether any additional documentation is needed for your review. We request that any required hearing be held with respect to both Symetra Life and Symetra National.

We look forward to hearing from you regarding the foregoing request. If you have any questions regarding this request, please do not hesitate to contact me.

Respectfully submitted,



David S. Goldstein

Encl.

cc: James T. Odiorne
Thomas M. Marra
Margaret Meister

David S. Goldstein
Senior Vice President, General Counsel and Secretary
Symetra Financial Corporation
777 108th Avenue NE, Suite 1200
Bellevue, WA 98004-5135
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January 14, 2014

Mr. Nicholas C. Gerhart
Commissioner of Insurance
Iowa Insurance Division
Two Ruan Center
601 Locust, 4th Floor
Des Moines, Iowa 50309-3738

Re: Redomestication of Symetra Life Insurance Company (the "Applicant")

Dear Commissioner Gerhart:

Please accept this UCAA Primary Application for Redomestication (the "Application") which has been submitted seeking your approval for the redomestication of the Applicant to the state of Iowa. The Applicant is currently admitted to transact life insurance in the state of Iowa.

The Washington Office of the Insurance Commissioner (the "Washington OIC") is being provided with a copy of this Application, along with a request seeking its approval of the Applicant's redomestication. It is our understanding that the Washington OIC may require a hearing prior to granting its approval and that such approval may be subject to the approval of the redomestication by the Iowa Insurance Division (the "Iowa Division").

As further set forth in the Application, we believe that the redomestication of the Applicants to Iowa will further our efforts to grow and to diversify Symetra's product portfolio and risk profile. In conjunction with the redomestication, it is our intent to open an office in Des Moines and add employees to that office as we implement our growth plans. We do not anticipate that the redomestication will affect the Applicant's business operations and employees in the state of Washington.

In addition to the Application, we also intend to submit a UCAA Primary Application for Redomestication on behalf of Symetra National Life Insurance Company ("Symetra National"), a direct subsidiary of Symetra Life Insurance Company. As Symetra National is not currently licensed in the state of Iowa, we have submitted a UCAA Expansion Application (the "Expansion Application") on behalf of Symetra National concurrently with the Application. We will submit the UCAA Primary Application for Redomestication on behalf of Symetra National promptly following the Iowa Division's approval of Symetra National's Expansion Application.

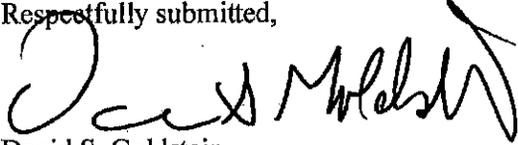
We understand that the Application and its contents will be treated as materials disclosed to the Iowa Division in the course of analysis of the financial condition or market conduct of the Applicant, and therefore will be treated as privileged and confidential pursuant to the authority set forth in Iowa Code §507.14. In the event that the Iowa Division at any time receives a request for or a subpoena requiring production of all or any portion of the Application that does not fall within the exceptions set forth in Iowa Code §507.14, subsection 3, we respectfully request that the Iowa Division immediately advise us

Mr. Nicholas C. Gerhart
Iowa Commissioner of Insurance
January 14, 2014
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of such request or subpoena in order that we may take the appropriate action to protect confidential information within the Application.

We look forward to hearing from you regarding the foregoing request. If you require any additional information, please do not hesitate to contact me.

Respectfully submitted,



David S. Goldstein

Encl.

cc: James N. Armstrong
James T. Odiorne
Thomas M. Marra
Margaret Meister