

**APPENDIX B**  
**NLIC FINANCIAL STATEMENTS**



# ANNUAL STATEMENT

For the Year Ended December 31, 2019  
of the Condition and Affairs of the

## National Legacy Insurance Company

NAIC Group Code..... 4234, 0000 (Current Period) (Prior Period)  
 NAIC Company Code..... 16660  
 Employer's ID Number..... 83-4075490

Organized under the Laws of OK  
 State of Domicile or Port of Entry OK  
 Country of Domicile US

Incorporated/Organized..... July 3, 2019  
 Commenced Business..... October 10, 2019

Statutory Home Office  
 2 Logan Square, Suite 600 .. Philadelphia .. PA .. US .. 19103  
*(Street and Number) (City or Town, State, Country and Zip Code)*

Main Administrative Office  
 2 Logan Square, Suite 600 .. Philadelphia .. PA .. US .. 19103  
*(Street and Number) (City or Town, State, Country and Zip Code)*  
 267-675-3348  
*(Area Code) (Telephone Number)*

Mail Address  
 2 Logan Square, Suite 600 .. Philadelphia .. PA .. US .. 19103  
*(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)*

Primary Location of Books and Records  
 2 Logan Square, Suite 600 .. Philadelphia .. PA .. US .. 19103  
*(Street and Number) (City or Town, State, Country and Zip Code)*  
 267-675-3348  
*(Area Code) (Telephone Number)*

Internet Web Site Address  
 N/A

Statutory Statement Contact  
 Desiree Rose Mecca  
*(Name)*  
 267-675-3348  
*(Area Code) (Telephone Number) (Extension)*  
 desiree.mecca@rqjh.com  
*(E-Mail Address)*  
 267-675-3340  
*(Fax Number)*

### OFFICERS

Name	Title	Name	Title
1. Pamela Susan Sellers-Hoelsken #	President	2. Desiree Rose Mecca #	Treasurer
3. Michael Logan Glover #	Secretary	4.	

### OTHER

### DIRECTORS OR TRUSTEES

Andrew William McCarthy #      Desiree Rose Mecca #      Christopher William Reichow #      Pamela Susan Sellers-Hoelsken #

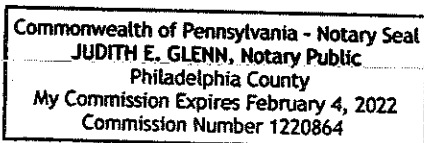
State of..... Pennsylvania  
 County of..... Philadelphia

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC *Annual Statement Instructions and Accounting Practices and Procedures* manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

(Signature)	(Signature)	(Signature)
Pamela Susan Sellers-Hoelsken	Desiree Rose Mecca	Michael Logan Glover
1. (Printed Name)	2. (Printed Name)	3. (Printed Name)
President	Treasurer	Secretary
(Title)	(Title)	(Title)

Subscribed and sworn to before me  
 This 16 day of February 2020

a. Is this an original filing? Yes [X] No [ ]  
 b. If no: 1. State the amendment number \_\_\_\_\_  
 2. Date filed \_\_\_\_\_  
 3. Number of pages attached \_\_\_\_\_



## ASSETS

	Current Year			Prior Year
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
1. Bonds (Schedule D).....			.0	
2. Stocks (Schedule D):				
2.1 Preferred stocks.....			.0	
2.2 Common stocks.....			.0	
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens.....			.0	
3.2 Other than first liens.....			.0	
4. Real estate (Schedule A):				
4.1 Properties occupied by the company (less \$.....0 encumbrances).....			.0	
4.2 Properties held for the production of income (less \$.....0 encumbrances).....			.0	
4.3 Properties held for sale (less \$.....0 encumbrances).....			.0	
5. Cash (\$.....4,719,741, Schedule E-Part 1), cash equivalents (\$.....295,099, Schedule E-Part 2) and short-term investments (\$.....0, Schedule DA).....	5,014,840		5,014,840	
6. Contract loans (including \$.....0 premium notes).....			.0	
7. Derivatives (Schedule DB).....			.0	
8. Other invested assets (Schedule BA).....			.0	
9. Receivables for securities.....			.0	
10. Securities lending reinvested collateral assets (Schedule DL).....			.0	
11. Aggregate write-ins for invested assets.....	.0	.0	.0	.0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	5,014,840	.0	5,014,840	.0
13. Title plants less \$.....0 charged off (for Title insurers only).....			.0	
14. Investment income due and accrued.....			.0	
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....			.0	
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$.....0 earned but unbilled premiums).....			.0	
15.3 Accrued retrospective premiums (\$.....0) and contracts subject to redetermination (\$.....0).....			.0	
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....			.0	
16.2 Funds held by or deposited with reinsured companies.....			.0	
16.3 Other amounts receivable under reinsurance contracts.....			.0	
17. Amounts receivable relating to uninsured plans.....			.0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....			.0	
18.2 Net deferred tax asset.....			.0	
19. Guaranty funds receivable or on deposit.....			.0	
20. Electronic data processing equipment and software.....			.0	
21. Furniture and equipment, including health care delivery assets (\$.....0).....			.0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			.0	
23. Receivables from parent, subsidiaries and affiliates.....			.0	
24. Health care (\$.....0) and other amounts receivable.....			.0	
25. Aggregate write-ins for other-than-invested assets.....	.0	.0	.0	.0
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25).....	5,014,840	.0	5,014,840	.0
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			.0	
28. TOTAL (Lines 26 and 27).....	5,014,840	.0	5,014,840	.0

### DETAILS OF WRITE-INS

1101.....			.0	
1102.....			.0	
1103.....			.0	
1198. Summary of remaining write-ins for Line 11 from overflow page.....	.0	.0	.0	.0
1199. Totals (Lines 1101 through 1103 plus 1198) (Line 11 above).....	.0	.0	.0	.0
2501.....			.0	
2502.....			.0	
2503.....			.0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	.0	.0	.0	.0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	.0	.0	.0	.0

## LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Year	2 Prior Year
1. Losses (Part 2A, Line 35, Column 8).....		
2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6).....		
3. Loss adjustment expenses (Part 2A, Line 35, Column 9).....		
4. Commissions payable, contingent commissions and other similar charges.....		
5. Other expenses (excluding taxes, licenses and fees).....		
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....		
7.1 Current federal and foreign income taxes (including \$.....0 on realized capital gains (losses)).....	3,092	
7.2 Net deferred tax liability.....		
8. Borrowed money \$.....0 and interest thereon \$.....0.....		
9. Unearned premiums (Part 1A, Line 38, Column 5) (after deducting unearned premiums for ceded reinsurance of \$.....0 and including warranty reserves of \$.....0 and accrued accident and health experience rating refunds including \$.....0 for medical loss ratio rebate per the Public Health Service Act).....		
10. Advance premium.....		
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....		
13. Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 20).....		
14. Amounts withheld or retained by company for account of others.....		
15. Remittances and items not allocated.....		
16. Provision for reinsurance (including \$.....0 certified) (Schedule F, Part 3, Column 78).....		
17. Net adjustments in assets and liabilities due to foreign exchange rates.....		
18. Drafts outstanding.....		
19. Payable to parent, subsidiaries and affiliates.....		
20. Derivatives.....		
21. Payable for securities.....		
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$.....0 and interest thereon \$.....0.....		
25. Aggregate write-ins for liabilities.....	0	0
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	3,092	0
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	3,092	0
29. Aggregate write-ins for special surplus funds.....	0	0
30. Common capital stock.....		
31. Preferred capital stock.....		
32. Aggregate write-ins for other-than-special surplus funds.....	0	0
33. Surplus notes.....		
34. Gross paid in and contributed surplus.....	5,000,117	
35. Unassigned funds (surplus).....	11,631	
36. Less treasury stock, at cost:		
36.1 .....0.000 shares common (value included in Line 30 \$.....0).....		
36.2 .....0.000 shares preferred (value included in Line 31 \$.....0).....		
37. Surplus as regards policyholders (Lines 29 to 35, less 36) (Page 4, Line 39).....	5,011,748	0
38. TOTAL (Page 2, Line 28, Col. 3).....	5,014,840	0

### DETAILS OF WRITE-INS

2501. ....		
2502. ....		
2503. ....		
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	0	0
2901. ....		
2902. ....		
2903. ....		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 through 2903 plus 2998) (Line 29 above).....	0	0
3201. ....		
3202. ....		
3203. ....		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 through 3203 plus 3298) (Line 32 above).....	0	0

**STATEMENT OF INCOME**

	1 Current Year	2 Prior Year
<b>UNDERWRITING INCOME</b>		
1. Premiums earned (Part 1, Line 35, Column 4).....		
DEDUCTIONS:		
2. Losses incurred (Part 2, Line 35, Column 7).....		
3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1).....		
4. Other underwriting expenses incurred (Part 3, Line 25, Column 2).....	.760	
5. Aggregate write-ins for underwriting deductions.....	.0	.0
6. Total underwriting deductions (Lines 2 through 5).....	.760	.0
7. Net income of protected cells.....		
8. Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7).....	(760)	.0
<b>INVESTMENT INCOME</b>		
9. Net investment income earned (Exhibit of Net Investment Income, Line 17).....	15,483	
10. Net realized capital gains (losses) less capital gains tax of \$.....0 (Exhibit of Capital Gains (Losses)).....		
11. Net investment gain (loss) (Lines 9 + 10).....	15,483	.0
<b>OTHER INCOME</b>		
12. Net gain (loss) from agents' or premium balances charged off (amount recovered \$.....0 amount charged off \$.....0).....	.0	
13. Finance and service charges not included in premiums.....		
14. Aggregate write-ins for miscellaneous income.....	.0	.0
15. Total other income (Lines 12 through 14).....	.0	.0
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	14,723	.0
17. Dividends to policyholders.....		
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17).....	14,723	.0
19. Federal and foreign income taxes incurred.....	3,092	
20. Net income (Line 18 minus Line 19) (to Line 22).....	11,631	.0
<b>CAPITAL AND SURPLUS ACCOUNT</b>		
21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2).....	.0	
22. Net income (from Line 20).....	11,631	.0
23. Net transfers (to) from Protected Cell accounts.....		
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....0.....		
25. Change in net unrealized foreign exchange capital gain (loss).....		
26. Change in net deferred income tax.....		
27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Column 3).....		
28. Change in provision for reinsurance (Page 3, Line 16, Column 2 minus Column 1).....		
29. Change in surplus notes.....		
30. Surplus (contributed to) withdrawn from Protected Cells.....		
31. Cumulative effect of changes in accounting principles.....		
32. Capital changes:		
32.1 Paid in.....		
32.2 Transferred from surplus (Stock Dividend).....		
32.3 Transferred to surplus.....		
33. Surplus adjustments:		
33.1 Paid in.....	5,000,117	
33.2 Transferred to capital (Stock Dividend).....		
33.3. Transferred from capital.....		
34. Net remittances from or (to) Home Office.....		
35. Dividends to stockholders.....		
36. Change in treasury stock (Page 3, Lines 36.1 and 36.2, Column 2 minus Column 1).....		
37. Aggregate write-ins for gains and losses in surplus.....	.0	.0
38. Change in surplus as regards policyholders for the year (Lines 22 through 37).....	5,011,748	.0
39. Surplus as regards policyholders, December 31 current year (Line 21 plus Line 38) (Page 3, Line 37).....	5,011,748	.0
<b>DETAILS OF WRITE-INS</b>		
0501. ....		
0502. ....		
0503. ....		
0598. Summary of remaining write-ins for Line 5 from overflow page.....	.0	.0
0599. Totals (Lines 0501 through 0503 plus 0598) (Line 5 above).....	.0	.0
1401. ....		
1402. ....		
1403. ....		
1498. Summary of remaining write-ins for Line 14 from overflow page.....	.0	.0
1499. Totals (Lines 1401 through 1403 plus 1498) (Line 14 above).....	.0	.0
3701. ....		
3702. ....		
3703. ....		
3798. Summary of remaining write-ins for Line 37 from overflow page.....	.0	.0
3799. Totals (Lines 3701 through 3703 plus 3798) (Line 37 above).....	.0	.0

Annual Statement for the year 2019 of the **National Legacy Insurance Company**  
**CASH FLOW**

	1 Current Year	2 Prior Year
<b>CASH FROM OPERATIONS</b>		
1. Premiums collected net of reinsurance.....		
2. Net investment income.....	15,483	
3. Miscellaneous income.....		
4. Total (Lines 1 through 3).....	15,483	0
5. Benefit and loss related payments.....		
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....		
7. Commissions, expenses paid and aggregate write-ins for deductions.....	760	
8. Dividends paid to policyholders.....		
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....		
10. Total (Lines 5 through 9).....	760	0
11. Net cash from operations (Line 4 minus Line 10).....	14,723	0
<b>CASH FROM INVESTMENTS</b>		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds.....		
12.2 Stocks.....		
12.3 Mortgage loans.....		
12.4 Real estate.....		
12.5 Other invested assets.....		
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....		
12.7 Miscellaneous proceeds.....		
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	0	0
13. Cost of investments acquired (long-term only):		
13.1 Bonds.....		
13.2 Stocks.....		
13.3 Mortgage loans.....		
13.4 Real estate.....		
13.5 Other invested assets.....		
13.6 Miscellaneous applications.....		
13.7 Total investments acquired (Lines 13.1 to 13.6).....	0	0
14. Net increase (decrease) in contract loans and premium notes.....		
15. Net cash from investments (Line 12.8 minus Lines 13.7 minus Line 14).....	0	0
<b>CASH FROM FINANCING AND MISCELLANEOUS SOURCES</b>		
16. Cash provided (applied):		
16.1 Surplus notes, capital notes.....		
16.2 Capital and paid in surplus, less treasury stock.....	5,000,117	
16.3 Borrowed funds.....		
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....		
16.5 Dividends to stockholders.....		
16.6 Other cash provided (applied).....		
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6).....	5,000,117	0
<b>RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS</b>		
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17).....	5,014,840	0
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year.....	0	
19.2 End of year (Line 18 plus Line 19.1).....	5,014,840	0

Note: Supplemental disclosures of cash flow information for non-cash transactions:

20.0001 .....		
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**Underwriting and Investment Ex. - Pt. 1 - Ex. of Premiums Earned  
NONE**

**Underwriting and Investment Ex. - Pt. 1A - Recapitulation of All Premiums  
NONE**

**Underwriting and Investment Ex. - Pt. 1B - Ex. Premiums Written  
NONE**

**Underwriting and Investment Ex. - Pt. 2 - Losses Paid and Incurred  
NONE**

**Underwriting and Investment Ex. - Pt. 2A - Unpaid Losses and Loss Adjustment Expenses  
NONE**

**UNDERWRITING AND INVESTMENT EXHIBIT**

**PART 3 - EXPENSES**

	1	2	3	4
	Loss Adjustment Expenses	Other Underwriting Expenses	Investment Expenses	Total
1. Claim adjustment services:				
1.1 Direct.....				0
1.2 Reinsurance assumed.....				0
1.3 Reinsurance ceded.....				0
1.4 Net claim adjustment services (1.1 + 1.2 - 1.3).....	0	0	0	0
2. Commission and brokerage:				
2.1 Direct, excluding contingent.....				0
2.2 Reinsurance assumed, excluding contingent.....				0
2.3 Reinsurance ceded, excluding contingent.....				0
2.4 Contingent - direct.....				0
2.5 Contingent - reinsurance assumed.....				0
2.6 Contingent - reinsurance ceded.....				0
2.7 Policy and membership fees.....				0
2.8 Net commission and brokerage (2.1 + 2.2 - 2.3 + 2.4 + 2.5 - 2.6 + 2.7).....	0	0	0	0
3. Allowances to manager and agents.....				0
4. Advertising.....				0
5. Boards, bureaus and associations.....				0
6. Surveys and underwriting reports.....				0
7. Audit of assureds' records.....				0
8. Salary and related items:				
8.1 Salaries.....				0
8.2 Payroll taxes.....				0
9. Employee relations and welfare.....				0
10. Insurance.....				0
11. Directors' fees.....				0
12. Travel and travel items.....				0
13. Rent and rent items.....				0
14. Equipment.....				0
15. Cost or depreciation of EDP equipment and software.....				0
16. Printing and stationery.....				0
17. Postage, telephone and telegraph, exchange and express.....				0
18. Legal and auditing.....			501	501
19. Totals (Lines 3 to 18).....	0	0	501	501
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of \$.....0.....				0
20.2 Insurance department licenses and fees.....		760		760
20.3 Gross guaranty association assessments.....				0
20.4 All other (excluding federal and foreign income and real estate).....				0
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4).....	0	760	0	760
21. Real estate expenses.....				0
22. Real estate taxes.....				0
23. Reimbursements by uninsured plans.....				0
24. Aggregate write-ins for miscellaneous expenses.....	0	0	0	0
25. Total expenses incurred.....	0	760	501	(a) 1,261
26. Less unpaid expenses - current year.....				0
27. Add unpaid expenses - prior year.....				0
28. Amounts receivable relating to uninsured plans, prior year.....				0
29. Amounts receivable relating to uninsured plans, current year.....				0
30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29).....	0	760	501	1,261

**DETAILS OF WRITE-INS**

2401. ....				0
2402. ....				0
2403. ....				0
2498. Summary of remaining write-ins for Line 24 from overflow page.....	0	0	0	0
2499. Totals (Lines 2401 through 2403 plus 2498) (Line 24 above).....	0	0	0	0

(a) Includes management fees of \$.....0 to affiliates and \$.....0 to non-affiliates.



## EXHIBIT OF NET INVESTMENT INCOME

	1 Collected During Year	2 Earned During Year
1. U.S. government bonds.....	(a).....	.....
1.1 Bonds exempt from U.S. tax.....	(a).....	.....
1.2 Other bonds (unaffiliated).....	(a).....	.....
1.3 Bonds of affiliates.....	(a).....	.....
2.1 Preferred stocks (unaffiliated).....	(b).....	.....
2.11 Preferred stocks of affiliates.....	(b).....	.....
2.2 Common stocks (unaffiliated).....	.....	.....
2.21 Common stocks of affiliates.....	.....	.....
3. Mortgage loans.....	(c).....	.....
4. Real estate.....	(d).....	.....
5. Contract loans.....	.....	.....
6. Cash, cash equivalents and short-term investments.....	(e)..... 15,984	..... 15,984
7. Derivative instruments.....	(f).....	.....
8. Other invested assets.....	.....	.....
9. Aggregate write-ins for investment income.....	..... 0	..... 0
10. Total gross investment income.....	..... 15,984	..... 15,984
11. Investment expenses.....	.....	(g)..... 501
12. Investment taxes, licenses and fees, excluding federal income taxes.....	.....	(g).....
13. Interest expense.....	.....	(h).....
14. Depreciation on real estate and other invested assets.....	.....	(i)..... 0
15. Aggregate write-ins for deductions from investment income.....	.....	..... 0
16. Total deductions (Lines 11 through 15).....	.....	..... 501
17. Net investment income (Line 10 minus Line 16).....	.....	..... 15,483

### DETAILS OF WRITE-INS

0901. ....	.....	.....
0902. ....	.....	.....
0903. ....	.....	.....
0998. Summary of remaining write-ins for Line 9 from overflow page.....	..... 0	..... 0
0999. Totals (Lines 0901 through 0903 plus 0998) (Line 9 above).....	..... 0	..... 0
1501. ....	.....	.....
1502. ....	.....	.....
1503. ....	.....	.....
1598. Summary of remaining write-ins for Line 15 from overflow page.....	.....	..... 0
1599. Totals (Lines 1501 through 1503 plus 1598) (Line 15 above).....	.....	..... 0

- (a) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (b) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued dividends on purchases.
- (c) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (d) Includes \$.....0 for company's occupancy of its own buildings; and excludes \$.....0 interest on encumbrances.
- (e) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (f) Includes \$.....0 accrual of discount less \$.....0 amortization of premium.
- (g) Includes \$.....0 investment expenses and \$.....0 investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$.....0 interest on surplus notes and \$.....0 interest on capital notes.
- (i) Includes \$.....0 depreciation on real estate and \$.....0 depreciation on other invested assets.

## EXHIBIT OF CAPITAL GAINS (LOSSES)

	1 Realized Gain (Loss) on Sales or Maturity	2 Other Realized Adjustments	3 Total Realized Capital Gain (Loss) (Columns 1 + 2)	4 Change in Unrealized Capital Gain (Loss)	5 Change in Unrealized Foreign Exchange Capital Gain (Loss)
1. U.S. government bonds.....	.....	.....	.....0	.....	.....
1.1 Bonds exempt from U.S. tax.....	.....	.....	.....0	.....	.....
1.2 Other bonds (unaffiliated).....	.....	.....	.....0	.....	.....
1.3 Bonds of affiliates.....	.....	.....	.....0	.....	.....
2.1 Preferred stocks (unaffiliated).....	.....	.....	.....0	.....	.....
2.11 Preferred stocks of affiliates.....	.....	.....	.....0	.....	.....
2.2 Common stocks (unaffiliated).....	.....	.....	.....0	.....	.....
2.21 Common stocks of affiliates.....	.....	.....	.....0	.....	.....
3. Mortgage loans.....	.....	.....	.....0	.....	.....
4. Real estate.....	.....	.....	.....0	.....	.....
5. Contract loans.....	.....	.....	.....0	.....	.....
6. Cash, cash equivalents and short-term investments.....	.....	.....	.....0	.....	.....
7. Derivative instruments.....	.....	.....	.....0	.....	.....
8. Other invested assets.....	.....	.....	.....0	.....	.....
9. Aggregate write-ins for capital gains (losses).....	..... 0	..... 0	..... 0	..... 0	..... 0
10. Total capital gains (losses).....	..... 0	..... 0	..... 0	..... 0	..... 0

### DETAILS OF WRITE-INS

0901. ....	.....	.....	.....0	.....	.....
0902. ....	.....	.....	.....0	.....	.....
0903. ....	.....	.....	.....0	.....	.....
0998. Summary of remaining write-ins for Line 9 from overflow page.....	..... 0	..... 0	..... 0	..... 0	..... 0
0999. Totals (Lines 0901 through 0903 plus 0998) (Line 9 above).....	..... 0	..... 0	..... 0	..... 0	..... 0

## EXHIBIT OF NONADMITTED ASSETS

	1 Current Year Total Nonadmitted Assets	2 Prior Year Total Nonadmitted Assets	3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D).....			0
2. Stocks (Schedule D):			
2.1 Preferred stocks.....			0
2.2 Common stocks.....			0
3. Mortgage loans on real estate (Schedule B):			
3.1 First liens.....			0
3.2 Other than first liens.....			0
4. Real estate (Schedule A):			
4.1 Properties occupied by the company.....			0
4.2 Properties held for the production of income.....			0
4.3 Properties held for sale.....			0
5. Cash (Schedule E-Part 1), cash equivalents (Schedule E-Part 2) and short-term investments (Schedule DA).....			0
6. Contract loans.....			0
7. Derivatives (Schedule DB).....			0
8. Other invested assets (Schedule BA).....			0
9. Receivables for securities.....			0
10. Securities lending reinvested collateral assets (Schedule DL).....			0
11. Aggregate write-ins for invested assets.....	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	0	0	0
13. Title plants (for Title insurers only).....			0
14. Investment income due and accrued.....			0
15. Premiums and considerations:			
15.1 Uncollected premiums and agents' balances in the course of collection.....			0
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due.....			0
15.3 Accrued retrospective premiums and contracts subject to redetermination.....			0
16. Reinsurance:			
16.1 Amounts recoverable from reinsurers.....			0
16.2 Funds held by or deposited with reinsured companies.....			0
16.3 Other amounts receivable under reinsurance contracts.....			0
17. Amounts receivable relating to uninsured plans.....			0
18.1 Current federal and foreign income tax recoverable and interest thereon.....			0
18.2 Net deferred tax asset.....			0
19. Guaranty funds receivable or on deposit.....			0
20. Electronic data processing equipment and software.....			0
21. Furniture and equipment, including health care delivery assets.....			0
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0
23. Receivables from parent, subsidiaries and affiliates.....			0
24. Health care and other amounts receivable.....			0
25. Aggregate write-ins for other-than-invested assets.....	0	0	0
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	0	0	0
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0
28. TOTALS (Lines 26 and 27).....	0	0	0

NONE

### DETAILS OF WRITE-INS

1101. ....			0
1102. ....			0
1103. ....			0
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0
1199. Totals (Lines 1101 through 1103 plus 1198) (Line 11 above).....	0	0	0
2501. ....			0
2502. ....			0
2503. ....			0
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	0	0	0

**NOTES TO FINANCIAL STATEMENTS****Note 1 – Summary of Significant Accounting Policies and Going Concern****A. Accounting Practices**

National Legacy Insurance Company is a newly formed insurance company domiciled in Oklahoma. It was incorporated on July 3, 2019 and authorized to commence business on October 10, 2019.

The financial statements of the National Legacy Insurance Company ("the Company") are presented on the basis of accounting practices prescribed or permitted by the Oklahoma Department of Insurance.

The Oklahoma Department of Insurance recognizes only statutory accounting practices prescribed or permitted by the state of Oklahoma for determining and reporting the financial condition and results of operations of an insurance company, for purposes of determining its solvency under the Oklahoma Insurance Law. The National Association of Insurance Commissioners' ("NAIC") Accounting Practices and Procedures Manual has been adopted as a component of prescribed or permitted practices by the state of Oklahoma.

	SSAP #	F/S Page	F/S Line #	2019	2018
<b>NET INCOME</b>					
(1) Company state basis (Page 4, Line 20, Columns 1 & 2)	XXX	XXX	XXX	\$ 11,631	\$
(2) State Prescribed Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(3) State Permitted Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(4) NAIC SAP (1 – 2 – 3 = 4)	XXX	XXX	XXX	\$ 11,631	\$
<b>SURPLUS</b>					
(5) Company state basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 5,011,748	\$
(6) State Prescribed Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(7) State Permitted Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(8) NAIC SAP (5 – 6 – 7 = 8)	XXX	XXX	XXX	\$ 5,011,748	\$

**B. Use of Estimates in the Preparation of the Financial Statement**

The preparation of financial statements in conformity with Statutory Accounting Principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities. It also requires disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

**C. Accounting Policy**

- (1) Basis for Short-Term Investments  
Short term investments are stated at fair value, which approximates cost.
- (2) Basis for Bonds and Amortization Schedule  
Not Applicable
- (3) Basis for Common Stocks  
Not Applicable
- (4) Basis for Preferred Stocks  
Not Applicable
- (5) Basis for Mortgage Loans  
Not Applicable
- (6) Basis for Loan-Backed Securities and Adjustment Methodology  
Not Applicable
- (7) Accounting Policies for Investments in Subsidiaries, Controlled and Affiliated Entities  
Not Applicable
- (8) Accounting Policies for Investments in Joint Ventures, Partnerships and Limited Liability Entities  
Not Applicable
- (9) Accounting Policies for Derivatives  
Not Applicable
- (10) Anticipated Investment Income Used in Premium Deficiency Calculation  
Not Applicable
- (11) Management's Policies and Methodologies for Estimating Liabilities for Losses and Loss/Claim Adjustment Expenses  
Not Applicable
- (12) Changes in the Capitalization Policy and Predefined Thresholds from Prior Period  
Not Applicable
- (13) Method Used to Estimate Pharmaceutical Rebate Receivables

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## NOTES TO FINANCIAL STATEMENTS

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Not Applicable

D. Going Concern

Not Applicable

### **Note 2 – Accounting Changes and Correction of Errors**

The Company did not have any material changes in accounting principles and/or corrections of errors.

### **Note 3 – Business Combinations and Goodwill**

A. Statutory Purchase Method

Not Applicable

B. Statutory Merger

Not Applicable

C. Impairment Loss

Not Applicable

### **Note 4 – Discontinued Operations**

A. Discontinued Operation Disposed of or Classified as Held for Sale

Not Applicable

B. Change in Plan of Sale of Discontinued Operation

Not Applicable

C. Nature of any Significant Continuing Involvement with Discontinued Operations After Disposal

Not Applicable

D. Equity Interest Retained in the Discontinued Operation After Disposal

Not Applicable

### **Note 5 – Investments**

A. Mortgage Loans, including Mezzanine Real Estate Loans

Not Applicable

B. Debt Restructuring

Not Applicable

C. Reverse Mortgages

Note Applicable

D. Loan-Backed Securities

Not Applicable

E. Dollar Repurchase Agreements and/or Securities Lending Transactions

Not Applicable

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing

Not Applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing

Not Applicable

H. Repurchase Agreements Transactions Accounted for as a Sale

Not Applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale

Not Applicable

**NOTES TO FINANCIAL STATEMENTS**

J. Real Estate

Not Applicable

K. Low-Income Housing Tax Credits (LIHTC)

Not Applicable

L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted)				Restricted		
	Current Year				6	7	
	1	2	3	4	5		
	Total General Account (G/A)	G/A Supporting Protected Cell Account Activity (a)	Total Protected Call Account (S/A) Restricted Assets	Protected Cell Account Assets Supporting G/A Activity (b)	Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)
a. Subject to contractual obligation for which liability is not shown	\$	\$	\$	\$	\$	\$	\$
b. Collateral held under security lending arrangements							
c. Subject to repurchase agreements							
d. Subject to reverse repurchase agreements							
e. Subject to dollar repurchase agreements							
f. Subject to dollar reverse repurchase agreements							
g. Placed under option contracts							
h. Letter stock or securities restricted as to sale – excluding FHLB capital stock							
i. FHLB capital stock							
j. On deposit with states	295,099				295,099		295,099
k. On deposit with other regulatory bodies							
l. Pledged as collateral to FHLB (including assets backing funding agreements)							
m. Pledged as collateral not captured in other categories							
n. Other restricted assets							
o. Total Restricted Assets	\$ 295,099	\$	\$	\$	\$ 295,099	\$	\$ 295,099

Restricted Asset Category	Current Year			
	8	9	Percentage	
			10	11
			Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)
Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)			
a. Subject to contractual obligation for which liability is not shown	\$	\$	%	%
b. Collateral held under security lending arrangements			%	%
c. Subject to repurchase agreements			%	%
d. Subject to reverse repurchase agreements			%	%
e. Subject to dollar repurchase agreements			%	%
f. Subject to dollar reverse repurchase agreements			%	%
g. Placed under option contracts			%	%
h. Letter stock or securities restricted as to sale – excluding FHLB capital stock			%	%
i. FHLB capital stock			%	%
j. On deposit with states		295,099	5.9%	5.9%
k. On deposit with other regulatory bodies			%	%
l. Pledged as collateral to FHLB (including assets backing funding agreements)			%	%
m. Pledged as collateral not captured in other categories			%	%

**NOTES TO FINANCIAL STATEMENTS**

Restricted Asset Category	Current Year			
	8 Total Nonadmitted Restricted	9 Total Admitted Restricted (5 minus 8)	Percentage	
			10	11
			Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)
n. Other restricted assets			%	%
o. Total Restricted Assets	\$	\$ 295,099	5.9%	5.9%

(a) Subset of column 1

(b) Subset of column 3

(c) Column 5 divided by Asset Page, Column 1, Line 28

(d) Column 9 divided by Asset Page, Column 3, Line 28

- (2) Detail of Assets Pledged as Collateral Not Captured in Other Categories (Contacts that Share Similar Characteristics, Such as Reinsurance and Derivatives, are Reported in the Aggregate)

Not Applicable

- (3) Detail of Other Restricted Assets (Contracts that Share Similar Characteristics, such as Reinsurance and Derivatives, are Reported in the Aggregate)

Not Applicable

- (4) Collateral Received and Reflected as Assets Within the Reporting Entity's Financial Statements

Not Applicable

## M. Working Capital Finance Investments

Not Applicable

## N. Offsetting and Netting of Assets and Liabilities

Not Applicable

## O. 5GI Securities

Not Applicable

## P. Short Sales

Not Applicable

## Q. Prepayment Penalty and Acceleration Fees

Not Applicable

**Note 6 – Joint Ventures, Partnerships and Limited Liability Companies**

## A. Investments in Joint Ventures, Partnerships and Limited Liability Companies that Exceed 10% of Ownership

Not Applicable

## B. Investments in Impaired Joint Ventures, Partnerships and Limited Liability Companies

Not Applicable

**Note 7 – Investment Income**

## A. The bases, by category of investment income, for excluding (nonadmitting) any investment income due and accrued:

The Company does not admit investment income due and accrued if amounts are over 90 days past due.

## B. The total amount excluded:

\$Not Applicable

**Note 8 – Derivative Instruments**

## A-B. Purpose, Risks, Accounting

Not Applicable

**Note 9 – Income Taxes**

National Legacy Insurance Company is a 2019 formed insurance company domiciled in Oklahoma. It was incorporated on July 3, 2019 and authorized to commence business on October 10, 2019. At December 31, 2019 there was no business written and minimal activity on the books and a current tax provision of 21% was recorded.

## A. Deferred Tax Assets/(Liabilities)

1. Components of Net Deferred Tax Asset/(Liability)

**NOTES TO FINANCIAL STATEMENTS**

	2019			2018			Change		
	1 Ordinary	2 Capital	3 (Col 1+2) Total	4 Ordinary	5 Capital	6 (Col 4+5) Total	7 (Col 1-4) Ordinary	8 (Col 2-5) Capital	9 (Col 7+8) Total
a. Gross deferred tax assets	\$	\$	\$	\$	\$	\$	\$	\$	\$
b. Statutory valuation allowance adjustment									
c. Adjusted gross deferred tax assets (1a-1b)	\$	\$	\$	\$	\$	\$	\$	\$	\$
d. Deferred tax assets nonadmitted									
e. Subtotal net admitted deferred tax asset (1c-1d)	\$	\$	\$	\$	\$	\$	\$	\$	\$
f. Deferred tax liabilities									
g. Net admitted deferred tax assets/(net deferred tax liability) (1e-1f)	\$	\$	\$	\$	\$	\$	\$	\$	\$

2. Admission Calculation Components SSAP No. 101

	2019			2018			Change		
	1 Ordinary	2 Capital	3 (Col 1+2) Total	4 Ordinary	5 Capital	6 (Col 4+5) Total	7 (Col 1-4) Ordinary	8 (Col 2-5) Capital	9 (Col 7+8) Total
a. Federal income taxes paid in prior years recoverable through loss carrybacks	\$	\$	\$	\$	\$	\$	\$	\$	\$
b. Adjusted gross deferred tax assets expected to be realized (excluding the amount of deferred tax assets from 2(a) above) after application of the threshold limitation. (The lesser of 2(b)1 and 2(b)2 below)									
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date									
2. Adjusted gross deferred tax assets allowed per limitation threshold									
c. Adjusted gross deferred tax assets (excluding the amount of deferred tax assets from 2(a) and 2(b) above) offset by gross deferred tax liabilities									
d. Deferred tax assets admitted as the result of application of SSAP 101. Total (2(a)+2(b)+2(c))	\$	\$	\$	\$	\$	\$	\$	\$	\$

3. Other Admissibility Criteria

	2019	2018
a. Ratio percentage used to determine recovery period and threshold limitation amount	%	%
b. Amount of adjusted capital and surplus used to determine recovery period and threshold limitation in 2(b)2 above	\$	\$

4. Impact of Tax Planning Strategies

(a) Determination of adjusted gross deferred tax assets and net admitted deferred tax assets, by tax character as a percentage.

	2019		2018		Change	
	1 Ordinary	2 Capital	3 Ordinary	4 Capital	5 (Col. 1-3) Ordinary	6 (Col. 2-4) Capital
1. Adjusted gross DTAs amount from Note	\$	\$	\$	\$	\$	\$

**NOTES TO FINANCIAL STATEMENTS**

	2019		2018		Change	
	1 Ordinary	2 Capital	3 Ordinary	4 Capital	5 (Col. 1-3) Ordinary	6 (Col. 2-4) Capital
9A1(c)						
2. Percentage of adjusted gross DTAs by tax character attributable to the impact of tax planning strategies	%	%	%	%	%	%
3. Net Admitted Adjusted Gross DTAs amount from Note 9A1(e)	\$	\$	\$	\$	\$	\$
4. Percentage of net admitted adjusted gross DTAs by tax character admitted because of the impact of tax planning strategies	%	%	%	%	%	%

(b) Does the company's tax planning strategies include the use of reinsurance?

B. Deferred Tax Liabilities Not Recognized - Not Applicable

C. Current and Deferred Income Taxes

## 1. Current Income Tax

	1 2019	2 2018	3 (Col 1-2) Change
a. Federal	\$ 3,092	\$	\$ 3,092
b. Foreign	\$	\$	\$
c. Subtotal	\$ 3,092	\$	\$ 3,092
d. Federal income tax on net capital gains	\$	\$	\$
e. Utilization of capital loss carry-forwards	\$	\$	\$
f. Other	\$	\$	\$
g. Federal and Foreign income taxes incurred	\$ 3,092	\$	\$ 3,092

## 2. Deferred Tax Assets

	1 2019	2 2018	3 (Col 1-2) Change
a. Ordinary:			
1. Discounting of unpaid losses	\$	\$	\$
2. Unearned premium reserve			
3. Policyholder reserves			
4. Investments			
5. Deferred acquisition costs			
6. Policyholder dividends accrual			
7. Fixed assets			
8. Compensation and benefits accrual			
9. Pension accrual			
10. Receivables - nonadmitted			
11. Net operating loss carry-forward			
12. Tax credit carry-forward			
13. Other (items <=5% and >5% of total ordinary tax assets)			
Other (items listed individually >5% of total ordinary tax assets)			
99. Subtotal	\$	\$	\$
b. Statutory valuation allowance adjustment			
c. Nonadmitted			
d. Admitted ordinary deferred tax assets (2a99-2b-2c)	\$	\$	\$
e. Capital:			
1. Investments	\$	\$	\$
2. Net capital loss carry-forward			
3. Real estate			
4. Other (items <=5% and >5% of total capital tax assets)			
Other (items listed individually >5% of total capital tax assets)			
99. Subtotal	\$	\$	\$
f. Statutory valuation allowance adjustment			
g. Nonadmitted			
h. Admitted capital deferred tax assets (2e99-2f-2g)			
i. Admitted deferred tax assets (2d+2h)	\$	\$	\$



**NOTES TO FINANCIAL STATEMENTS**

## 3. Deferred Tax Liabilities

	1	2	3
	2019	2018	(Col 1-2) Change
a. Ordinary:			
1. Investments	\$	\$	\$
2. Fixed assets			
3. Deferred and uncollected premium			
4. Policyholder reserves			
5. Other (items <=5% and >5% of total ordinary tax liabilities)			
Other (items listed individually >5% of total ordinary tax liabilities)			
99. Subtotal	\$	\$	\$
b. Capital:			
1. Investments	\$	\$	\$
2. Real estate			
3. Other (Items <=5% and >5% of total capital tax liabilities)			
Other (items listed individually >5% of total capital tax liabilities)			
99. Subtotal	\$	\$	\$
c. Deferred tax liabilities (3a99+3b99)	\$	\$	\$
4. Net Deferred Tax Assets/Liabilities (2i – 3c)	\$	\$	\$

## D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate Among the more significant book to tax adjustments were the following:

	Amount	Effective Tax Rate (%)
<b>Permanent Differences:</b>		
Provision computed at statutory rate	\$	%
Change in nonadmitted assets		%
Proration of tax exempt investment income		%
Tax exempt income deduction		%
Dividends received deduction		%
Disallowed travel and entertainment		%
Other permanent differences		%
<b>Temporary Differences:</b>		
Total ordinary DTAs		%
Total ordinary DTLs		%
Total capital DTAs		%
Total capital DTLs		%
<b>Other:</b>		
Statutory valuation allowance adjustment		%
Accrual adjustment – prior year		%
Other		%
Totals	\$	%
Federal and foreign income taxes incurred	3,092	21.0%
Realized capital gains (losses) tax		%
Change in net deferred income taxes		%
Total statutory income taxes	\$ 3,092	21.0%

## E. Operating Loss Carry Forwards and Income Taxes Available for Recoupment

## 1. The amounts, origination dates and expiration dates of operating loss and tax credit carry forwards available for tax purposes:

Description (Operating Loss or Tax Credit Carry Forward)	Amounts	Origination Dates	Expiration Dates
	\$		

## 2. The following is income tax expense for current year and proceeding years that is available for recoupment in the event of future net losses:

Year	Amounts
	\$

## 3. The Company's aggregate amount of deposits admitted under Section 6603 of the Internal Revenue Service Code

## F. Consolidated Federal Income Tax Return

## 1. The Company's federal income tax return is consolidated with the following entities:

Randall & Quilter America Holdings Inc.  
R&Q Solutions LLC  
R&Q Quest PCC, LCC  
RSI Solutions International, Inc.  
Excess and Treaty Management Corporation  
Requiem America, Inc.  
R&Q Services Holding Inc.

**NOTES TO FINANCIAL STATEMENTS**

Accredited Holding Corporation  
 Accredited Surety and Casualty Company, Inc.  
 Accredited Bond Agencies, Inc.  
 Accredited Group Agency, Inc.  
 R&Q Healthcare Interest, LLC  
 Randall & Quilter Healthcare Holdings, Inc.  
 Transport Insurance Company  
 R&Q Reinsurance Company  
 Syndicated Services Company, Inc.  
 R&Q RI Insurance Company  
 ICDC, Ltd.  
 Global Reinsurance Corporation of America  
 Global US Holdings, Inc.  
 Grafton US Holdings  
 LBL Acquisition  
 Risk Transfer Underwriting, Inc.  
 National Legacy Insurance Company

2. The manner in which the Board of Directors sets forth for allocating the consolidated federal income tax:  
 Randall & Quilter America Holdings Inc. maintains a tax sharing agreement with its subsidiaries, approved by the Board of Directors, whereby allocation of the tax liability is made primarily on a separate return basis, with current credit given for net losses utilized in the consolidated return.

The method of allocation among companies is subject to a written agreement, approved by the Board of Directors, whereby allocation is made primarily on a separate return basis with current credit for any net operating losses or other items utilized in the consolidated tax return.

- G. Federal or Foreign Federal Income Tax Loss Contingencies:

Not Applicable

- H. Repatriation Transition Tax (RTT) - RTT owed under the TCJA

Not Applicable

- I. Alternative Minimum Tax Credit

Not Applicable

**Note 10 – Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties**

- A. Nature of the Relationship Involved

The Company is a direct 100% owned subsidiary of Randall & Quilter America Holdings Inc. which in turn is a wholly-owned subsidiary of Randall & Quilter Investment Holdings Ltd. See Schedule Y, Part 1, Organizational Chart.

- B. Transactions

Not Applicable

- C. Dollar Amounts of Transactions

Change in terms of Intercompany Arrangements –Intercompany agreements have been amended to include any new entities. Certain expenses are shared between Group companies on an equitable basis.

- D. Amounts Due From or To Related Parties

Amounts Due to or from Related Parties - As of December 31, 2019, the Company has no amounts due from (to) related parties.

- E. Guarantees or Undertakings

None

- F. Material Management or Service Contracts and Cost-Sharing Arrangements

The Company is part of a Service Agreement with its immediate parent, Randall & Quilter America Holdings, Inc. The cost sharing agreement is amended from time to time and approved by the applicable regulators.

- G. Nature of the Control Relationship

Not Applicable

- H. Amount Deducted from the Value of Upstream Intermediate Entity or Ultimate Parent Owned

Not Applicable

- I. Investments in SCA that Exceed 10% of Admitted Assets

Not Applicable

- J. Investments in Impaired SCAs

Not Applicable

- K. Investment in Foreign Insurance Subsidiary

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## NOTES TO FINANCIAL STATEMENTS

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Not Applicable

L. Investment in Downstream Noninsurance Holding Company

Not Applicable

M. All SCA Investments

Not Applicable

N. Investment in Insurance SCAs

Not Applicable

O. SCA or SSAP 48 Entity Loss Tracking

Not Applicable

### **Note 11 – Debt**

A. Debt, Including Capital Notes

Not Applicable

B. FHLB (Federal Home Loan Bank) Agreements

Not Applicable

### **Note 12 – Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans**

A. Defined Benefit Plan

Not Applicable

B. Investment Policies and Strategies

Not Applicable

C. Fair Value of Plan Assets

Not Applicable

D. Basis Used to Determine Expected Long-Term Rate-of-Return

Not Applicable

E. Defined Contribution Plans

Not Applicable

F. Multiemployer Plans

Not Applicable

G. Consolidated/Holding Company Plans

Not Applicable

H. Postemployment Benefits and Compensated Absences

Not Applicable

I. Impact of Medicare Modernization Act on Postretirement Benefits (INT 04-17)

Not Applicable

### **Note 13 – Capital and Surplus, Shareholder's Dividend Restrictions and Quasi-Reorganizations**

(1) Number of Shares and Par or Stated Value of Each Class

The Company has 100,000 shares of common stock authorized with a par value of \$1.00 per share.

(2) Dividend Rate, Liquidation Value and Redemption Schedule of Preferred Stock Issues

Not Applicable

(3) Dividend Restrictions

Without the prior approval of its domiciliary commissioner, dividends to shareholders are limited by the laws of the Company's state of incorporation, Oklahoma, to zero, an amount that is based on restrictions relating to statutory surplus.

(4) Dates and Amounts of Dividends Paid

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## NOTES TO FINANCIAL STATEMENTS

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Not Applicable

- (5) Profits that may be Paid as Ordinary Dividends to Stockholders

Not Applicable

- (6) Restrictions Placed on Unassigned Funds (Surplus)

Not Applicable

- (7) Amount of Advances to Surplus not Repaid

Not Applicable

- (8) Amount of Stock Held for Special Purposes

Not Applicable

- (9) Reasons for Changes in Balance of Special Surplus Funds from Prior Period

Not Applicable

- (10) The Portion of Unassigned Funds (Surplus) Represented or Reduced by Unrealized Gains and Losses is: \$0.

- (11) The Reporting Entity Issued the Following Surplus Debentures or Similar Obligations

Not Applicable

- (12) The impact of any restatement due to prior quasi-reorganizations is as follows

Not Applicable

- (13) Effective Date of Quasi-Reorganization for a Period of Ten Years Following Reorganization

Not Applicable

### **Note 14 – Liabilities, Contingencies and Assessments**

- A. Contingent Commitments

Not Applicable

- B. Assessments

Not Applicable

- C. Gain Contingencies

Not Applicable

- D. Claims Related Extra Contractual Obligation and Bad Faith Losses Stemming from Lawsuits

Not Applicable

- E. Product Warranties

Not Applicable

- F. Joint and Several Liabilities

Not Applicable

- G. All Other Contingencies

Not Applicable

### **Note 15 – Leases**

- A.-B. Not Applicable

### **Note 16 – Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk**

- 1.-4. Not Applicable

### **Note 17 – Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities**

- A. Transfers of Receivables Reported as Sales

Not Applicable

**NOTES TO FINANCIAL STATEMENTS****B. Transfer and Servicing of Financial Assets**

Not Applicable

**C. Wash Sales**

Not Applicable

**Note 18 – Gain or Loss to the Reporting Entity from Uninsured Plans and the Uninsured Portion of Partially Insured Plans**

A.-C. Not Applicable

**Note 19 – Direct Premium Written/Produced by Managing General Agents/Third Party Administrators**

Not Applicable

**Note 20 – Fair Value Measurements****A. Fair Value Measurements**

Not Applicable

**B. Fair Value Reporting under SSAP 100 and Other Accounting Pronouncements**

Not Applicable

**C. Fair Value Level**

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Cash, Cash Equivalent, & Short Term Investment	\$ 5,016,890	\$ 5,014,840	\$ 5,016,890	\$	\$	\$	\$
Total:	\$ 5,016,890	\$ 5,014,840	\$ 5,016,890	\$	\$	\$	\$

**D. Not Practicable to Estimate Fair Value**

Not Applicable

**E. NAV Practical Expedient Investments**

Not Applicable

**Note 21 – Other Items****A. Unusual or Infrequent Items**

Not Applicable

**B. Troubled Debt Restructuring Debtors**

Not Applicable

**C. Other Disclosures**

Not Applicable

**D. Business Interruption Insurance Recoveries**

Not Applicable

**E. State Transferable and Non-Transferable Tax Credits**

Not Applicable

**F. Subprime Mortgage-Related Risk Exposure**

Not Applicable

**G. Insurance-Linked Securities (ILS) Contracts**

Not Applicable

**H. The Amount that Could be Realized on Life Insurance Where the Reporting Entity is Owner and Beneficiary or has Otherwise Obtained Rights to Control the Policy**

Not Applicable

**Note 22 – Events Subsequent**

None

**Note 23 – Reinsurance****A. Unsecured Reinsurance Recoverables - None**

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## NOTES TO FINANCIAL STATEMENTS

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- B. Reinsurance Recoverable in Dispute - None
- C. Reinsurance Assumed and Ceded - Not Applicable
- D. Uncollectible Reinsurance - None
- E. Commutation of Ceded Reinsurance - None
- F. Retroactive Reinsurance - Not Applicable
- G. Reinsurance Accounted for as a Deposit - Not Applicable
- H. Disclosures for the Transfer of Property and Casualty Run-off Agreements - Not Applicable
- I. Certified Reinsurer Rating Downgraded or Status Subject to Revocation - Not Applicable
- J. Reinsurance Agreements Qualifying for Reinsurer Aggregation - Not Applicable

**Note 24 – Retrospectively Rated Contracts and Contracts Subject to Redetermination**

A.-F. Not Applicable

**Note 25 – Change in Incurred Losses and Loss Adjustment Expenses**

A.-B. Not Applicable

**Note 26 – Intercompany Pooling Arrangements**

Not Applicable

**Note 27 – Structured Settlements**

A.-B. Not Applicable

**Note 28 – Health Care Receivables**

A.-B. Not Applicable

**Note 29 – Participating Policies**

Not Applicable

**Note 30 – Premium Deficiency Reserves**

Not Applicable

**Note 31 – High Deductibles**

A.-B. Not Applicable

**Note 32 – Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses**

A.-C. Not Applicable

**Note 33 – Asbestos/Environmental Reserves**

A.-F. Not Applicable

**Note 34 – Subscriber Savings Accounts**

Not Applicable

**Note 35 – Multiple Peril Crop Insurance**

Not Applicable

**Note 36 – Financial Guaranty Insurance**

A.-B. Not Applicable

# GENERAL INTERROGATORIES

## PART 1 - COMMON INTERROGATORIES

### GENERAL

- 1.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes  No   
If yes, complete Schedule Y, Parts 1, 1A and 2.
- 1.2 If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations? Yes  No  N/A
- 1.3 State regulating? Oklahoma Insurance Department
- 1.4 Is the reporting entity publicly traded or a member of publicly traded group? Yes  No
- 1.5 If the response to 1.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group. RQIH - UK AIM
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes  No
- 2.2 If yes, date of change: \_\_\_\_\_
- 3.1 State as of what date the latest financial examination of the reporting entity was made or is being made. \_\_\_\_\_
- 3.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released. \_\_\_\_\_
- 3.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). \_\_\_\_\_
- 3.4 By what department or departments? \_\_\_\_\_
- 3.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with departments? Yes  No  N/A
- 3.6 Have all of the recommendations within the latest financial examination report been complied with? Yes  No  N/A
- 4.1 During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity) receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
- 4.11 sales of new business? Yes  No
- 4.12 renewals? Yes  No
- 4.2 During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
- 4.21 sales of new business? Yes  No
- 4.22 renewals? Yes  No
- 5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes  No   
If the answer is YES, complete and file the merger history data file with the NAIC.
- 5.2 If yes, provide the name of entity, NAIC company code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.
- | 1<br>Name of Entity | 2<br>NAIC<br>Company<br>Code | 3<br>State of<br>Domicile |
|---------------------|------------------------------|---------------------------|
|                     |                              |                           |
- 6.1 Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? Yes  No
- 6.2 If yes, give full information:
- 7.1 Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity? Yes  No
- 7.2 If yes,
- 7.21 State the percentage of foreign control 100.0%
- 7.22 State the nationality(s) of the foreign person(s) or entity(s); or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact and identify the type of entity(s) (e.g., individual, corporation, government, manager or attorney-in-fact).
- | 1<br>Nationality               | 2<br>Type of Entity |
|--------------------------------|---------------------|
| United Kingdom (Direct 19.87%) | Corporate           |
- 8.1 Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board? Yes  No
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.
- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes  No
- 8.4 If the response to 8.3 is yes, please provide below the names and locations (city and state of the main office) of any affiliates regulated by a federal financial regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.
- | 1<br>Affiliate Name | 2<br>Location (City, State) | 3<br>FRB | 4<br>OCC | 5<br>FDIC | 6<br>SEC |
|---------------------|-----------------------------|----------|----------|-----------|----------|
|                     |                             |          |          |           |          |
9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?  
2019 exemption granted.
- 10.1 Has the insurer been granted any exemptions to the prohibited non-audit services provided by the certified independent public accountant requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation? Yes  No
- 10.2 If the response to 10.1 is yes, provide information related to this exemption:
- 10.3 Has the insurer been granted any exemptions related to other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 18A of the Model Regulation, or substantially similar state law or regulation? Yes  No
- 10.4 If the response to 10.3 is yes, provide information related to this exemption:  
2019 exemption granted for the audited financials and actuarial opinion.

# GENERAL INTERROGATORIES

## PART 1 - COMMON INTERROGATORIES

- 10.5 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? Yes [ ] No [X] N/A [ ]
- 10.6 If the response to 10.5 is no or n/a, please explain:  
National Legacy Insurance Company is a newly formed insurance company domiciled in Oklahoma. It was incorporated on July 3, 2019 and authorized to commence business on October 10, 2019. Currently the Board of Directors is performing the functions of an audit committee. An audit committee will be formed when the Company begins to write business.
11. What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?  
2019 exemption granted.
- 12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? Yes [ ] No [X]
- 12.11 Name of real estate holding company
- 12.12 Number of parcels involved 0
- 12.13 Total book/adjusted carrying value \$ 0
- 12.2 If yes, provide explanation

**FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:**

- 13.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?
- 13.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? Yes [ ] No [ ]
- 13.3 Have there been any changes made to any of the trust indentures during the year? Yes [ ] No [ ]
- 13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? Yes [ ] No [ ] N/A [ ]
- 14.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? Yes [X] No [ ]
- (a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
- (c) Compliance with applicable governmental laws, rules and regulations;
- (d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
- (e) Accountability for adherence to the code.
- 14.11 If the response to 14.1 is no, please explain:
- 14.2 Has the code of ethics for senior managers been amended? Yes [ ] No [X]
- 14.21 If the response to 14.2 is yes, provide information related to amendment(s).
- 14.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes [ ] No [X]
- 14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).

- 15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance where the issuing or confirming bank is not on the SVO Bank List? Yes [ ] No [X]
- 15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount
			\$

### BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the Board of Directors or a subordinator committee thereof? Yes [X] No [ ]
17. Does the reporting entity keep a complete permanent record of the proceedings of its Board of Directors and all subordinate committees thereof? Yes [X] No [ ]
18. Has the reporting entity an established procedure for disclosure to its Board of Directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict or is likely to conflict with the official duties of such person? Yes [X] No [ ]

### FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? Yes [ ] No [X]
- 20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):
- 20.11 To directors or other officers \$ 0
- 20.12 To stockholders not officers \$ 0
- 20.13 Trustees, supreme or grand (Fraternal only) \$ 0
- 20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):
- 20.21 To directors or other officers \$ 0
- 20.22 To stockholders not officers 0
- 20.23 Trustees, supreme or grand (Fraternal only) 0
- 21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reporting in the statement? Yes [ ] No [X]
- 21.2 If yes, state the amount thereof at December 31 of the current year:
- 21.21 Rented from others \$ 0
- 21.22 Borrowed from others \$ 0
- 21.23 Leased from others \$ 0
- 21.24 Other \$ 0
- 22.1 Does this statement include payments for assessments as described in the *Annual Statement Instructions* other than guaranty fund or guaranty association assessments? Yes [ ] No [X]
- 22.2 If answer is yes:
- 22.21 Amount paid as losses or risk adjustment \$ 0
- 22.22 Amount paid as expenses \$ 0
- 22.23 Other amounts paid \$ 0



# GENERAL INTERROGATORIES

## PART 1 - COMMON INTERROGATORIES

23.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes [ ] No [X]  
 23.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ 0

### INVESTMENT

24.01 Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date (other than securities lending programs addressed in 24.03)? Yes [X] No [ ]  
 24.02 If no, give full and complete information, relating thereto:

24.03 For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet (an alternative is to reference Note 17 where this information is also provided).

24.04 Does the company's security lending program meet the requirements for a conforming program as outlined in the *Risk-Based Capital Instructions*? Yes [ ] No [ ] N/A [X]

24.05 If answer to 24.04 is yes, report amount of collateral for conforming programs. \$ 0

24.06 If answer to 24.04 is no, report amount of collateral for other programs \$ 0

24.07 Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract? Yes [ ] No [ ] N/A [X]

24.08 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? Yes [ ] No [ ] N/A [X]

24.09 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities Lending Agreement (MSLA) to conduct securities lending? Yes [ ] No [ ] N/A [X]

24.10 For the reporting entity's security lending program, state the amount of the following as of December 31 of the current year:

24.101 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0

24.102 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0

24.103 Total payable for securities lending reported on the liability page: \$ 0

25.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity or has the reporting entity sold or transferred any assets subject to a put option contract that is current in force? (Exclude securities subject to Interrogatory 21.1 and 24.03.) Yes [X] No [ ]

25.2 If yes, state the amount thereof at December 31 of the current year:

25.21 Subject to repurchase agreements \$ 0

25.22 Subject to reverse repurchase agreements \$ 0

25.23 Subject to dollar repurchase agreements \$ 0

25.24 Subject to reverse dollar repurchase agreements \$ 0

25.25 Placed under option agreements \$ 0

25.26 Letter stock or securities restricted as sale – excluding FHLB Capital Stock \$ 0

25.27 FHLB Capital Stock \$ 0

25.28 On deposit with states \$ 295,099

25.29 On deposit with other regulatory bodies \$ 0

25.30 Pledged as collateral – excluding collateral pledged to an FHLB \$ 0

25.31 Pledged as collateral to FHLB – including assets backing funding agreements \$ 0

25.32 Other \$ 0

25.3 For category (25.26) provide the following:

1 Nature of Restriction	2 Description	3 Amount
		\$

26.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes [ ] No [X]

26.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [ ] No [ ] N/A [X]  
 If no, attach a description with this statement.

**Lines 26.3 through 26.5: FOR LIFE/FRATERNAL REPORTING ENTITIES ONLY:**

26.3 Does the reporting entity utilize derivatives to hedge variable annuity guarantees subject to fluctuations as a results of interest rate sensitivity? Yes [ ] No [ ]

26.4 If the response to 26.3 is yes, does the reporting entity utilize:

26.41 Special accounting provision of SSAP No. 108 Yes [ ] No [ ]

26.42 Permitted accounting practice Yes [ ] No [ ]

26.43 Other accounting guidance Yes [ ] No [ ]

26.5 By responding yes to 26.41 regarding utilizing the special accounting provisions of SSAP No. 108, the reporting entity attests to the following: Yes [ ] No [ ]

- The reporting entity has obtained explicit approval from the domiciliary state.
- Hedging strategy subject to the special accounting provisions is consistent with the requirements of VM-21.
- Actuarial certification has been obtained which indicates that the hedging strategy is incorporated within the establishment of VM-21 reserves and provides the impact of the hedging strategy within the Actuarial Guidance Conditional Tail Expectation Amount.
- Financial Officer Certification has been obtained which indicates that the hedging strategy meets the definition of a Clearly Defined Hedging Strategy within VM-21 and the Clearly Defined Hedging Strategy is the hedging strategy being used by the company in its actual day-to-day risk mitigation efforts.

27.1 Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into equity, or, at the option of the issuer, convertible into equity? Yes [ ] No [X]

27.2 If yes, state the amount thereof at December 31 of the current year: \$ 0

28. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*? Yes [X] No [ ]

28.01 For agreements that comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, complete the following:

1 Name of Custodian(s)	2 Custodian's Address
Bank of Oklahoma	499 West Sheridan Ave, Suite 2505, Oklahoma City, OK 73102

# GENERAL INTERROGATORIES

## PART 1 - COMMON INTERROGATORIES

28.02 For all agreements that do not comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, provide the name, location and a complete explanation

1 Name(s)	2 Location(s)	3 Complete Explanation(s)

28.03 Have there been any changes, including name changes, in the custodian(s) identified in 28.01 during the current year? Yes [ ] No [ X ]

28.04 If yes, give full and complete information relating thereto:

1 Old Custodian	2 New Custodian	3 Date of Change	4 Reason

28.05 Investment management – Identify all investment advisors, investment managers, broker/dealers, including individuals that have the authority to make investment decisions on behalf of the reporting entity. For assets that are managed internally by employees of the reporting entity, note as such. ["...that have access to the investment accounts", "... handle securities"].

1 Name of Firm or Individual	2 Affiliation

28.0597 For those firms/individuals listed in the table for Question 28.05, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's invested assets? Yes [ ] No [ X ]

28.0598 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 28.05, does the total assets under management aggregate to more than 50% of the reporting entity's invested assets? Yes [ ] No [ X ]

28.06 For those firms or individuals listed in the table for 28.05 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1	2	3	4	5
Central Registration Depository Number	Name of Firm or Individual	Legal Entity Identifier (LEI)	Registered With	Investment Management Agreement (IMA) Filed

29.1 Does the reporting entity have any diversified mutual funds reported in Schedule D-Part 2 (diversified according to the Securities and Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5 (b) (1)])? Yes [ ] No [ X ]

29.2 If yes, complete the following schedule:

1 CUSIP	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
		\$
29.2999 TOTAL		\$

29.3 For each mutual fund listed in the table above, complete the following schedule:

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holding	4 Date of Valuation
		\$	

30. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

		1 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
30.1	Bonds	\$ 295,099	\$ 297,149	\$ 2,050
30.2	Preferred Stocks	\$ 0	\$ 0	\$ 0
30.3	Totals	\$ 295,099	\$ 297,149	\$ 2,050

30.4 Describe the sources or methods utilized in determining the fair values:

At this time, the only security is a treasury bill and the custodian statement was used as of December 31, 2019.

31.1 Was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Schedule D? Yes [ X ] No [ ]

31.2 If the answer to 31.1 is yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic copy) for all brokers or custodians used as a pricing source? Yes [ ] No [ X ]

31.3 If the answer to 31.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:

At this time, the only security is a MMF and the custodian statement was used as December 31, 2019.

32.1 Have all the filing requirements of the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* been followed? Yes [ X ] No [ ]

32.2 If no, list exceptions:

33. By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designation 5GI security:

- a. Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
- b. Issuer or obligor is current on all contracted interest and principal payments.
- c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

Has the reporting entity self-designated 5GI securities? Yes [ ] No [ X ]

34. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:

- a. The security was purchased prior to January 1, 2018.
- b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
- c. The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as an NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
- d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

Has the reporting entity self-designated PLGI securities? Yes [ ] No [ X ]

## GENERAL INTERROGATORIES

### PART 1 - COMMON INTERROGATORIES

35. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:
- a. The shares were purchased prior to January 1, 2019.
  - b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
  - c. The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.
  - d. The fund only or predominantly holds bonds in its portfolio.
  - e. The current reported NAIC Designation was derived from the public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO.
  - f. The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.

Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria?

Yes [ ] No [X]

#### OTHER

36.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any? \$ 0

36.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
	\$

37.1 Amount of payments for legal expenses, if any? \$ 0

37.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
	\$

38.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? \$ 0

38.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
	\$

**GENERAL INTERROGATORIES****PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

1.1	Does the reporting entity have any direct Medicare Supplement Insurance in force?			Yes [ ]	No [ X ]
1.2	If yes, indicate premium earned on U.S. business only.	\$			0
1.3	What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit?	\$			0
1.31	Reason for excluding:				
1.4	Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above.	\$			0
1.5	Indicate total incurred claims on all Medicare Supplement insurance.	\$			0
1.6	Individual policies:				
	Most current three years:				
1.61	Total premium earned	\$			0
1.62	Total incurred claims	\$			0
1.63	Number of covered lives				0
	All years prior to most current three years:				
1.64	Total premium earned	\$			0
1.65	Total incurred claims	\$			0
1.66	Number of covered lives				0
1.7	Group policies:				
	Most current three years:				
1.71	Total premium earned	\$			0
1.72	Total incurred claims	\$			0
1.73	Number of covered lives				0
	All years prior to most current three years:				
1.74	Total premium earned	\$			0
1.75	Total incurred claims	\$			0
1.76	Number of covered lives				0
2.	Health Test:				
			1	2	
			Current Year	Prior Year	
2.1	Premium Numerator	\$	0	\$	0
2.2	Premium Denominator	\$	0	\$	0
2.3	Premium Ratio (2.1/2.2)		0.0%		0.0%
2.4	Reserve Numerator	\$	0	\$	0
2.5	Reserve Denominator	\$	0	\$	0
2.6	Reserve Ratio (2.4/2.5)		0.0%		0.0%
3.1	Does the reporting entity issue both participating and non-participating policies?				Yes [ ] No [ X ]
3.2	If yes, state the amount of calendar year premiums written on:				
3.21	Participating policies	\$			0
3.22	Non-participating policies	\$			0
4.	FOR MUTUAL REPORTING ENTITIES AND RECIPROCAL EXCHANGES ONLY:				
4.1	Does the reporting entity issue assessable policies?				Yes [ ] No [ ]
4.2	Does the reporting entity issue non-assessable policies?				Yes [ ] No [ ]
4.3	If assessable policies are issued, what is the extent of the contingent liability of the policyholders?				%
4.4	Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums.	\$			0
5.	FOR RECIPROCAL EXCHANGES ONLY:				
5.1	Does the exchange appoint local agents?				Yes [ ] No [ ]
5.2	If yes, is the commission paid:				
5.21	Out of Attorney's-in-fact compensation				Yes [ ] No [ ] N/A [ ]
5.22	As a direct expense of the exchange				Yes [ ] No [ ] N/A [ ]
5.3	What expenses of the exchange are not paid out of the compensation of the Attorney-in-fact?				
5.4	Has any Attorney-in-fact compensation, contingent on fulfillment of certain conditions, been deferred?				Yes [ ] No [ ]
5.5	If yes, give full information:				
6.1	What provision has this reporting entity made to protect itself from an excessive loss in the event of a catastrophe under a workers' compensation contract issued without limit of loss? <u>National Legacy Insurance Company is a newly formed company - No business written in 2019</u>				
6.2	Describe the method used to estimate this reporting entity's probable maximum insurance loss, and identify the type of insured exposures comprising that probable maximum loss, the locations of concentrations of those exposures and the external resources (such as consulting firms or computer software models), if any, used in the estimation process: <u>National Legacy Insurance Company is a newly formed company - No business written in 2019</u>				
6.3	What provision has this reporting entity made (such as catastrophic reinsurance program) to protect itself from an excessive loss arising from the types and concentrations of insured exposures comprising its probable maximum property insurance loss? <u>National Legacy Insurance Company is a newly formed company - No business written in 2019</u>				
6.4	Does the reporting entity carry catastrophe reinsurance protection for at least one reinstatement, in an amount sufficient to cover its estimated probable maximum loss attributable to a single loss event or occurrence?				Yes [ ] No [ X ]
6.5	If no, describe any arrangements or mechanisms employed by the reporting entity to supplement its catastrophe reinsurance program or to hedge its exposure to unreinsured catastrophic loss: <u>National Legacy Insurance Company is a newly formed company - No business written in 2019</u>				
7.1	Has the reporting entity reinsured any risk with any other entity under a quota share reinsurance contract that includes a provision that would limit the reinsurer's losses below the stated quota share percentage (e.g., a deductible, a loss ratio corridor, a loss cap, an aggregate limit or any similar provisions)?				Yes [ ] No [ X ]

## GENERAL INTERROGATORIES

## PART 2 – PROPERTY &amp; CASUALTY INTERROGATORIES

7.2	If yes, indicate the number of reinsurance contracts containing such provisions.	0
7.3	If yes, does the amount of reinsurance credit taken reflect the reduction in quota share coverage caused by any applicable limiting provision(s)?	Yes [ ] No [X]
8.1	Has this reporting entity reinsured any risk with any other entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on this risk, or portion thereof, reinsured?	Yes [ ] No [X]
8.2	If yes, give full information	
9.1	Has the reporting entity ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates) for which during the period covered by the statement: (i) it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; (ii) it accounted for that contract as reinsurance and not as a deposit; and (iii) the contract(s) contain one or more of the following features or other features that would have similar results: (a) A contract term longer than two years and the contract is noncancellable by the reporting entity during the contract term; (b) A limited or conditional cancellation provision under which cancellation triggers an obligation by the reporting entity, or an affiliate of the reporting entity, to enter into a new reinsurance contract with the reinsurer, or an affiliate of the reinsurer; (c) Aggregate stop loss reinsurance coverage; (d) A unilateral right by either party (or both parties) to commute the reinsurance contract, whether conditional or not, except for such provisions which are only triggered by a decline in the credit status of the other party; (e) A provision permitting reporting of losses, or payment of losses, less frequently than on a quarterly basis (unless there is no activity during the period); or (f) Payment schedule, accumulating retentions from multiple years or any features inherently designed to delay timing of the reimbursement to the ceding entity?	Yes [ ] No [X]
9.2	Has the reporting entity during the period covered by the statement ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates), for which, during the period covered by the statement, it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; excluding cessions to approved pooling arrangements or to captive insurance companies that are directly or indirectly controlling, controlled by, or under common control with (i) one or more unaffiliated policyholders of the reporting entity, or (ii) an association of which one or more unaffiliated policyholders of the reporting entity is a member where: (a) The written premium ceded to the reinsurer by the reporting entity or its affiliates represents fifty percent (50%) or more of the entire direct and assumed premium written by the reinsurer based on its most recently available financial statement; or (b) Twenty-five percent (25%) or more of the written premium ceded to the reinsurer has been retroceded back to the reporting entity or its affiliates in a separate reinsurance contract.	Yes [ ] No [X]
9.3	If yes to 9.1 or 9.2, please provide the following information in the Reinsurance Summary Supplemental Filing for General Interrogatory 9: (a) The aggregate financial statement impact gross of all such ceded reinsurance contracts on the balance sheet and statement of income; (b) A summary of the reinsurance contract terms and indicate whether it applies to the contracts meeting the criteria in 9.1 or 9.2; and (c) A brief discussion of management's principle objectives in entering into the reinsurance contract including the economic purpose to be achieved.	
9.4	Except for transactions meeting the requirements of paragraph 37 of SSAP No. 62R, <i>Property and Casualty Reinsurance</i> , has the reporting entity ceded any risk under any reinsurance contract (or multiple contracts with the same reinsurer or its affiliates) during the period covered by the financial statement, and either: (a) Accounted for that contract as reinsurance (either prospective or retroactive) under statutory accounting principles ("SAP") and as a deposit under generally accepted accounting principles ("GAAP"); or (b) Accounted for that contract as reinsurance under GAAP and as a deposit under SAP?	Yes [ ] No [X]
9.5	If yes to 9.4, explain in the Reinsurance Summary Supplemental Filing for General Interrogatory 9 (Section D) why the contract(s) is treated differently for GAAP and SAP.	
9.6	The reporting entity is exempt from the Reinsurance Attestation Supplement under one or more of the following criteria: (a) The entity does not utilize reinsurance; or, (b) The entity only engages in a 100% quota share contract with an affiliate and the affiliated or lead company has filed an attestation supplement; or (c) The entity has no external cessions and only participates in an intercompany pool and the affiliated or lead company has filed an attestation supplement.	Yes [ ] No [X]
10.	If the reporting entity has assumed risks from another entity, there should be charged on account of such reinsurances a reserve equal to that which the original entity would have been required to charge had it retained the risks. Has this been done?	Yes [ ] No [ ] N/A [X]
11.1	Has the reporting entity guaranteed policies issued by any other entity and now in force?	Yes [ ] No [X]
11.2	If yes, give full information	
12.1	If the reporting entity recorded accrued retrospective premiums on insurance contracts on Line 15.3 of the assets schedule, Page 2, state the amount of corresponding liabilities recorded for: 12.11 Unpaid losses 12.12 Unpaid underwriting expenses (including loss adjustment expenses)	\$ 0 \$ 0
12.2	Of the amount on Line 15.3, Page 2, state the amount that is secured by letters of credit, collateral and other funds?	\$ 0
12.3	If the reporting entity underwrites commercial insurance risks, such as workers' compensation, are premium notes or promissory notes accepted from its insureds covering unpaid premiums and/or unpaid losses?	Yes [ ] No [X] N/A [ ]
12.4	If yes, provide the range of interest rates charged under such notes during the period covered by this statement: 12.41 From 12.42 To	% %
12.5	Are letters of credit or collateral and other funds received from insureds being utilized by the reporting entity to secure premium notes or promissory notes taken by a reporting entity, or to secure any of the reporting entity's reported direct unpaid loss reserves, including unpaid losses under loss deductible features of commercial policies?	Yes [ ] No [X]
12.6	If yes, state the amount thereof at December 31 of current year: 12.61 Letters of Credit 12.62 Collateral and other funds	\$ 0 \$ 0
13.1	Largest net aggregate amount insured in any one risk (excluding workers' compensation):	\$ 0
13.2	Does any reinsurance contract considered in the calculation of this amount include an aggregate limit of recovery without also including a reinstatement provision?	Yes [ ] No [X]
13.3	State the number of reinsurance contracts (excluding individual facultative risk certificates, but including facultative programs, automatic facilities or facultative obligatory contracts) considered in the calculation of the amount.	0

**GENERAL INTERROGATORIES****PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

- 14.1 Is the reporting entity a cedant in a multiple cedant reinsurance contract? Yes [ ] No [X]
- 14.2 If yes, please describe the method of allocating and recording reinsurance among the cedants:
- 14.3 If the answer to 14.1 is yes, are the methods described in item 14.2 entirely contained in the respective multiple cedant reinsurance contracts? Yes [ ] No [X]
- 14.4 If the answer to 14.3 is no, are all the methods described in 14.2 entirely contained in written agreements? Yes [ ] No [X]
- 14.5 If the answer to 14.4 is no, please explain:
- 15.1 Has the reporting entity guaranteed any financed premium accounts? Yes [ ] No [X]
- 15.2 If yes, give full information
- 16.1 Does the reporting entity write any warranty business? Yes [ ] No [X]
- If yes, disclose the following information for each of the following types of warranty coverage:
- |                  | 1                      | 2                    | 3                      | 4                       | 5                     |
|------------------|------------------------|----------------------|------------------------|-------------------------|-----------------------|
|                  | Direct Losses Incurred | Direct Losses Unpaid | Direct Written Premium | Direct Premium Unearned | Direct Premium Earned |
| 16.11 Home       | \$ 0                   | \$ 0                 | \$ 0                   | \$ 0                    | \$ 0                  |
| 16.12 Products   | \$ 0                   | \$ 0                 | \$ 0                   | \$ 0                    | \$ 0                  |
| 16.13 Automobile | \$ 0                   | \$ 0                 | \$ 0                   | \$ 0                    | \$ 0                  |
| 16.14 Other*     | \$ 0                   | \$ 0                 | \$ 0                   | \$ 0                    | \$ 0                  |
- \* Disclose type of coverage:
- 17.1 Does the reporting entity include amounts recoverable on unauthorized reinsurance in Schedule F-Part 3 that is exempt from the statutory provision for unauthorized reinsurance? Yes [ ] No [X]
- Incurred but not reported losses on contracts in force prior to July 1, 1984, and not subsequently renewed are exempt from the statutory provision for unauthorized reinsurance. Provide the following information for this exemption:
- |  |      |
|--|------|
| 17.11 Gross amount of unauthorized reinsurance in Schedule F-Part 3 exempt from the statutory provision for unauthorized reinsurance | \$ 0 |
| 17.12 Unfunded portion of Interrogatory 17.11  | \$ 0 |
| 17.13 Paid losses and loss adjustment expenses portion of Interrogatory 17.11  | \$ 0 |
| 17.14 Case reserves portion of Interrogatory 17.11   | \$ 0 |
| 17.15 Incurred but not reported portion of Interrogatory 17.11   | \$ 0 |
| 17.16 Unearned premium portion of Interrogatory 17.11  | \$ 0 |
| 17.17 Contingent commission portion of Interrogatory 17.11   | \$ 0 |
- 18.1 Do you act as a custodian for health savings accounts? Yes [ ] No [X]
- 18.2 If yes, please provide the amount of custodial funds held as of the reporting date. \$ 0
- 18.3 Do you act as an administrator for health savings accounts? Yes [ ] No [X]
- 18.4 If yes, please provide the balance of the funds administered as of the reporting date. \$ 0
19. Is the reporting entity licensed or chartered, registered, qualified, eligible, or writing business in at least 2 states? Yes [ ] No [X]
- 19.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? Yes [ ] No [X]

## FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e. 17.6.

	1 2019	2 2018	3 2017	4 2016	5 2015
<b>Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 &amp; 3)</b>					
1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....					
2. Property lines (Lines 1, 2, 9, 12, 21 & 26).....					
3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....					
4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....					
5. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
6. Total (Line 35).....	.0	0	.0	.0	.0
<b>Net Premiums Written (Page 8, Part 1B, Col. 6)</b>					
7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....					
8. Property lines (Lines 1, 2, 9, 12, 21 & 26).....					
9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....					
10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....					
11. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
12. Total (Line 35).....	.0	0	.0	.0	.0
<b>Statement of Income (Page 4)</b>					
13. Net underwriting gain (loss) (Line 8).....	(760)				
14. Net investment gain (loss) (Line 11).....	15,483				
15. Total other income (Line 15).....					
16. Dividends to policyholders (Line 17).....					
17. Federal and foreign income taxes incurred (Line 19).....	3,092				
18. Net income (Line 20).....	11,631	0	.0	.0	.0
<b>Balance Sheet Lines (Pages 2 and 3)</b>					
19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3).....	5,014,840				
20. Premiums and considerations (Page 2, Col. 3):					
20.1 In course of collection (Line 15.1).....					
20.2 Deferred and not yet due (Line 15.2).....					
20.3 Accrued retrospective premiums (Line 15.3).....					
21. Total liabilities excluding protected cell business (Page 3, Line 26).....	3,092				
22. Losses (Page 3, Line 1).....					
23. Loss adjustment expenses (Page 3, Line 3).....					
24. Unearned premiums (Page 3, Line 9).....					
25. Capital paid up (Page 3, Lines 30 & 31).....					
26. Surplus as regards policyholders (Page 3, Line 37).....	5,011,748				
<b>Cash Flow (Page 5)</b>					
27. Net cash from operations (Line 11).....	14,723				
<b>Risk-Based Capital Analysis</b>					
28. Total adjusted capital.....	5,011,748				
29. Authorized control level risk-based capital.....	9,268				
<b>Percentage Distribution of Cash, Cash Equivalents and Invested Assets</b> (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0					
30. Bonds (Line 1).....					
31. Stocks (Lines 2.1 & 2.2).....					
32. Mortgage loans on real estate (Lines 3.1 & 3.2).....					
33. Real estate (Lines 4.1, 4.2 & 4.3).....					
34. Cash, cash equivalents and short-term investments (Line 5).....	100.0				
35. Contract loans (Line 6).....					
36. Derivatives (Line 7).....					
37. Other invested assets (Line 8).....					
38. Receivables for securities (Line 9).....					
39. Securities lending reinvested collateral assets (Line 10).....					
40. Aggregate write-ins for invested assets (Line 11).....					
41. Cash, cash equivalents and invested assets (Line 12).....	100.0	.00	.00	.00	.00
<b>Investments in Parent, Subsidiaries and Affiliates</b>					
42. Affiliated bonds (Sch. D, Summary, Line 12, Col. 1).....					
43. Affiliated preferred stocks (Sch. D, Summary, Line 18, Col. 1).....					
44. Affiliated common stocks (Sch. D, Summary, Line 24, Col. 1).....					
45. Affiliated short-term investments (subtotals included in Schedule DA, Verification, Column 5, Line 10).....					
46. Affiliated mortgage loans on real estate.....					
47. All other affiliated.....					
48. Total of above lines 42 to 47.....	.0	.0	.0	.0	.0
49. Total investment in parent included in Lines 42 to 47 above.....					
50. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line 48 above divided by Page 3, Col. 1, Line 37 x 100.0).....	.00				

**FIVE-YEAR HISTORICAL DATA**

(Continued)

	1	2	3	4	5
	2019	2018	2017	2016	2015
<b>Capital and Surplus Accounts (Page 4)</b>					
51. Net unrealized capital gains (losses) (Line 24).....					
52. Dividends to stockholders (Line 35).....					
53. Change in surplus as regards policyholders for the year (Line 38).....	5,011,748				
<b>Gross Losses Paid (Page 9, Part 2, Cols. 1 &amp; 2)</b>					
54. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....					
55. Property lines (Lines 1, 2, 9, 12, 21 & 26).....					
56. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....					
57. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....					
58. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
59. Total (Line 35).....	.0	.0	.0	.0	.0
<b>Net Losses Paid (Page 9, Part 2, Col. 4)</b>					
60. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....					
61. Property lines (Lines 1, 2, 9, 12, 21 & 26).....					
62. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....					
63. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....					
64. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
65. Total (Line 35).....	.0	.0	.0	.0	.0
<b>Operating Percentages (Page 4)</b> (Item divided by Page 4, Line 1) x 100.0					
66. Premiums earned (Line 1).....	100.0	100.0	100.0	100.0	100.0
67. Losses incurred (Line 2).....					
68. Loss expenses incurred (Line 3).....					
69. Other underwriting expenses incurred (Line 4).....					
70. Net underwriting gain (loss) (Line 8).....					
<b>Other Percentages</b>					
71. Other underwriting expenses to net premiums written (Page 4, Lines 4 + 5 - 15 divided by Page 8, Part 1B, Col. 6, Line 35 x 100.0).....					
72. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0).....					
73. Net premiums written to policyholders' surplus (Page 8, Part 1B, Col. 6, Line 35, divided by Page 3, Line 37, Col. 1 x 100.0).....					
<b>One Year Loss Development (\$000 omitted)</b>					
74. Development in estimated losses and loss expenses incurred prior to current year (Schedule P, Part 2-Summary, Line 12, Col. 11).....					
75. Percent of development of losses and loss expenses incurred to policyholders' surplus of prior year-end (Line 74 above divided by Page 4, Line 21, Col. 1 x 100).....					
<b>Two Year Loss Development (\$000 omitted)</b>					
76. Development in estimated losses and loss expenses incurred 2 years before the current year and prior year (Schedule P, Part 2-Summary, Line 12, Col. 12).....					
77. Percent of development of losses and loss expenses incurred to reported policyholders' surplus of second prior-year end (Line 76 above divided by Page 4, Line 21, Col. 2 x 100.0).....					

If a party to a merger, have the two most recent years of this exhibit been restated due to a merger in compliance with the disclosure requirements of SSAP No. 3, Accounting Changes and Correction of Errors?

Yes [ ] No [ ]

If no, please explain:

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**EXHIBIT OF PREMIUMS AND LOSSES (Statutory Page 14)**



NAIC Group Code....4234 NAIC Company Code....16660

BUSINESS IN GRAND TOTAL DURING THE YEAR

Line of Business	Gross Premiums, Including Policy and Membership Fees, Less Return Premiums and Premiums on Policies not Taken		3 Dividends Paid or Credited to Policyholders on Direct Business	4 Direct Unearned Premium Reserves	5 Direct Losses Paid (deducting salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Direct Defense and Cost Containment Expense Paid	9 Direct Defense and Cost Containment Expense Incurred	10 Direct Defense and Cost Containment Expense Unpaid	11 Commissions and Brokerage Expenses	12 Taxes, Licenses and Fees
	1 Direct Premiums Written	2 Direct Premiums Earned										
1. Fire.....												
2.1 Allied lines.....												
2.2 Multiple peril crop.....												
2.3 Federal flood.....												
2.4 Private crop.....												
2.5 Private flood.....												
3. Farmowners multiple peril.....												
4. Homeowners multiple peril.....												
5.1 Commercial multiple peril (non-liability portion).....												
5.2 Commercial multiple peril (liability portion).....												
6. Mortgage guaranty.....												
8. Ocean marine.....												
9. Inland marine.....												
10. Financial guaranty.....												
11. Medical professional liability.....												
12. Earthquake.....												
13. Group accident and health (b).....												
14. Credit A&H (group and individual).....												
15.1 Collectively renewable A&H (b).....												
15.2 Non-cancelable A&H (b).....												
15.3 Guaranteed renewable A&H (b).....												
15.4 Non-renewable for stated reasons only (b).....												
15.5 Other accident only.....												
15.6 Medicare Title XVIII exempt from state taxes or fees.....												
15.7 All other A&H (b).....												
15.8 Federal employees health benefits plan premium.....												
16. Workers' compensation.....												
17.1 Other liability-occurrence.....												
17.2 Other liability-claims-made.....												
17.3 Excess workers' compensation.....												
18. Products liability.....												
19.1 Private passenger auto no-fault (personal injury protection).....												
19.2 Other private passenger auto liability.....												
19.3 Commercial auto no-fault (personal injury protection).....												
19.4 Other commercial auto liability.....												
21.1 Private passenger auto physical damage.....												
21.2 Commercial auto physical damage.....												
22. Aircraft (all perils).....												
23. Fidelity.....												
24. Surety.....												
26. Burglary and theft.....												
27. Boiler and machinery.....												
28. Credit.....												
29. International.....												
30. Warranty.....												
34. Aggregate write-ins for other lines of business.....	0	0	0	0	0	0	0	0	0	0	0	0
35. TOTALS (a).....	0	0	0	0	0	0	0	0	0	0	0	0

**NONE**

**DETAILS OF WRITE-INS**

3401. ....												
3402. ....												
3403. ....												
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0	0	0	0	0	0	0
3499. TOTALS (Lines 3401 through 3403 plus 3498) (Line 34 above).....	0	0	0	0	0	0	0	0	0	0	0	0

(a) Finance and service charges not included in Lines 1 to 35 \$.....0.

(b) For health business on indicated lines report: Number of persons insured under PPO managed care products.....0 and number of persons insured under indemnity only products.....0.

**Sch. F - Pt. 1  
NONE**

**Sch. F - Pt. 2  
NONE**

**Sch. F - Pt. 3  
NONE**

**Sch. F - Pt. 3  
NONE**

**Sch. F - Pt. 3  
NONE**

**Sch. F - Pt. 3  
NONE**

**Sch. F - Pt. 3  
NONE**

**Sch. F - Pt. 4 Issuing or Confirming Banks for Letters of Credit from Scfpt3  
NONE**

**Sch. F - Pt. 5 Interrogatories for Sch. F Pt. 3  
NONE**

**SCHEDULE F - PART 6**

Restatement of Balance Sheet to Identify Net Credit for Reinsurance

	1 As Reported (Net of Ceded)	2 Restatement Adjustments	3 Restated (Gross of Ceded)
<b>ASSETS (Page 2, Col. 3)</b>			
1. Cash and invested assets (Line 12).....	5,014,840		5,014,840
2. Premiums and considerations (Line 15).....			.0
3. Reinsurance recoverable on loss and loss adjustment expense payments (Line 16.1).....			.0
4. Funds held by or deposited with reinsured companies (Line 16.2).....			.0
5. Other assets.....			.0
6. Net amount recoverable from reinsurers.....			.0
7. Protected cell assets (Line 27).....			.0
8. Totals (Line 28).....	5,014,840	.0	5,014,840
<b>LIABILITIES (Page 3)</b>			
9. Losses and loss adjustment expenses (Lines 1 through 3).....			.0
10. Taxes, expenses, and other obligations (Lines 4 through 8).....	3,092		3,092
11. Unearned premiums (Line 9).....			.0
12. Advance premiums (Line 10).....			.0
13. Dividends declared and unpaid (Line 11.1 and 11.2).....			.0
14. Ceded reinsurance premiums payable (net of ceding commissions) (Line 12).....			.0
15. Funds held by company under reinsurance treaties (Line 13).....			.0
16. Amounts withheld or retained by company for account of others (Line 14).....			.0
17. Provision for reinsurance (Line 16).....			.0
18. Other liabilities.....			.0
19. Total liabilities excluding protected cell business (Line 26).....	3,092	.0	3,092
20. Protected cell liabilities (Line 27).....			.0
21. Surplus as regards policyholders (Line 37).....	5,011,748	XXX	5,011,748
22. Totals (Line 38).....	5,014,840	.0	5,014,840

NOTE: Is the restatement of this exhibit the result of grossing up balances ceded to affiliates under 100 percent reinsurance or pooling arrangements?..Yes [ ] No [ X ]

If yes, give full explanation:

---

**Sch. H - Pt. 1  
NONE**

**Sch. H - Pt. 2  
NONE**

**Sch. H - Pt. 3  
NONE**

**Sch. H - Pt. 4  
NONE**

**Sch. H - Pt. 5  
NONE**

**Sch. P - Pt. 1  
NONE**

**Sch. P - Pt. 2  
NONE**

**Sch. P - Pt. 3  
NONE**

**Sch. P - Pt. 4  
NONE**

**Sch. P - Pt. 1A  
NONE**

**Sch. P - Pt. 1B  
NONE**

**Sch. P - Pt. 1C  
NONE**

**Sch. P - Pt. 1D  
NONE**

**Sch. P - Pt. 1E  
NONE**

**Sch. P - Pt. 1F - Sn. 1  
NONE**

**Sch. P - Pt. 1F - Sn. 2  
NONE**

**Sch. P - Pt. 1G  
NONE**

**Sch. P - Pt. 1H - Sn. 1  
NONE**

**Sch. P - Pt. 1H - Sn. 2  
NONE**

**Sch. P - Pt. 1I  
NONE**

**Sch. P - Pt. 1J**  
**NONE**

**Sch. P - Pt. 1K**  
**NONE**

**Sch. P - Pt. 1L**  
**NONE**

**Sch. P - Pt. 1M**  
**NONE**

**Sch. P - Pt. 1N**  
**NONE**

**Sch. P - Pt. 1O**  
**NONE**

**Sch. P - Pt. 1P**  
**NONE**

**Sch. P - Pt. 1R - Sn. 1**  
**NONE**

**Sch. P - Pt. 1R - Sn. 2**  
**NONE**

**Sch. P - Pt. 1S**  
**NONE**

**Sch. P - Pt. 1T**  
**NONE**

**Sch. P - Pt. 2A**  
**NONE**

**Sch. P - Pt. 2B**  
**NONE**

**Sch. P - Pt. 2C**  
**NONE**

**Sch. P - Pt. 2D**  
**NONE**

**Sch. P - Pt. 2E**  
**NONE**

**Sch. P - Pt. 2F - Sn. 1**  
**NONE**

**Sch. P - Pt. 2F - Sn. 2**  
**NONE**

**Sch. P - Pt. 2G**  
**NONE**

**Sch. P - Pt. 2H - Sn. 1**  
**NONE**

**Sch. P - Pt. 2H - Sn. 2**  
**NONE**

**Sch. P - Pt. 2I**  
**NONE**

**Sch. P - Pt. 2J**  
**NONE**

**Sch. P - Pt. 2K**  
**NONE**

**Sch. P - Pt. 2L**  
**NONE**

**Sch. P - Pt. 2M**  
**NONE**

**Sch. P - Pt. 2N**  
**NONE**

**Sch. P - Pt. 2O**  
**NONE**

**Sch. P - Pt. 2P**  
**NONE**

**Sch. P - Pt. 2R - Sn. 1**  
**NONE**

**Sch. P - Pt. 2R - Sn. 2**  
**NONE**

**Sch. P - Pt. 2S**  
**NONE**

**Sch. P - Pt. 2T**  
**NONE**

**Sch. P - Pt. 3A  
NONE**

**Sch. P - Pt. 3B  
NONE**

**Sch. P - Pt. 3C  
NONE**

**Sch. P - Pt. 3D  
NONE**

**Sch. P - Pt. 3E  
NONE**

**Sch. P - Pt. 3F - Sn. 1  
NONE**

**Sch. P - Pt. 3F - Sn. 2  
NONE**

**Sch. P - Pt. 3G  
NONE**

**Sch. P - Pt. 3H - Sn. 1  
NONE**

**Sch. P - Pt. 3H - Sn. 2  
NONE**

**Sch. P - Pt. 3I  
NONE**

**Sch. P - Pt. 3J  
NONE**

**Sch. P - Pt. 3K  
NONE**

**Sch. P - Pt. 3L  
NONE**

**Sch. P - Pt. 3M  
NONE**

**Sch. P - Pt. 3N  
NONE**

**Sch. P - Pt. 3O  
NONE**

**Sch. P - Pt. 3P  
NONE**

**Sch. P - Pt. 3R - Sn. 1**  
**NONE**

**Sch. P - Pt. 3R - Sn. 2**  
**NONE**

**Sch. P - Pt. 3S**  
**NONE**

**Sch. P - Pt. 3T**  
**NONE**

**Sch. P - Pt. 4A**  
**NONE**

**Sch. P - Pt. 4B**  
**NONE**

**Sch. P - Pt. 4C**  
**NONE**

**Sch. P - Pt. 4D**  
**NONE**

**Sch. P - Pt. 4E**  
**NONE**

**Sch. P - Pt. 4F - Sn. 1**  
**NONE**

**Sch. P - Pt. 4F - Sn. 2**  
**NONE**

**Sch. P - Pt. 4G**  
**NONE**

**Sch. P - Pt. 4H - Sn. 1**  
**NONE**

**Sch. P - Pt. 4H - Sn. 2**  
**NONE**

**Sch. P - Pt. 4I**  
**NONE**

**Sch. P - Pt. 4J**  
**NONE**

**Sch. P - Pt. 4K**  
**NONE**

**Sch. P - Pt. 4L**  
**NONE**

**Sch. P - Pt. 4M**  
**NONE**



**Sch. P - Pt. 4N  
NONE**

**Sch. P - Pt. 4O  
NONE**

**Sch. P - Pt. 4P  
NONE**

**Sch. P - Pt. 4R - Sn. 1  
NONE**

**Sch. P - Pt. 4R - Sn. 2  
NONE**

**Sch. P - Pt. 4S  
NONE**

**Sch. P - Pt. 4T  
NONE**

**Sch. P - Pt. 5A - Sn. 1  
NONE**

**Sch. P - Pt. 5A - Sn. 2  
NONE**

**Sch. P - Pt. 5A - Sn. 3  
NONE**

**Sch. P - Pt. 5B - Sn. 1  
NONE**

**Sch. P - Pt. 5B - Sn. 2  
NONE**

**Sch. P - Pt. 5B - Sn. 3  
NONE**

**Sch. P - Pt. 5C - Sn. 1  
NONE**

**Sch. P - Pt. 5C - Sn. 2  
NONE**

**Sch. P - Pt. 5C - Sn. 3  
NONE**

**Sch. P - Pt. 5D - Sn. 1  
NONE**

**Sch. P - Pt. 5D - Sn. 2  
NONE**

**Sch. P - Pt. 5D - Sn. 3  
NONE**

**Sch. P - Pt. 5E - Sn. 1  
NONE**

**Sch. P - Pt. 5E - Sn. 2  
NONE**

**Sch. P - Pt. 5E - Sn. 3  
NONE**

**Sch. P - Pt. 5F - Sn. 1A  
NONE**

**Sch. P - Pt. 5F - Sn. 2A  
NONE**

**Sch. P - Pt. 5F - Sn. 3A  
NONE**

**Sch. P - Pt. 5F - Sn. 1B  
NONE**

**Sch. P - Pt. 5F - Sn. 2B  
NONE**

**Sch. P - Pt. 5F - Sn. 3B  
NONE**

**Sch. P - Pt. 5H - Sn. 1A  
NONE**

**Sch. P - Pt. 5H - Sn. 2A  
NONE**

**Sch. P - Pt. 5H - Sn. 3A  
NONE**

**Sch. P - Pt. 5H - Sn. 1B  
NONE**

**Sch. P - Pt. 5H - Sn. 2B  
NONE**

**Sch. P - Pt. 5H - Sn. 3B  
NONE**

**Sch. P - Pt. 5R - Sn. 1A  
NONE**

**Sch. P - Pt. 5R - Sn. 2A  
NONE**

**Sch. P - Pt. 5R - Sn. 3A  
NONE**

**Sch. P - Pt. 5R - Sn. 1B**  
**NONE**

**Sch. P - Pt. 5R - Sn. 2B**  
**NONE**

**Sch. P - Pt. 5R - Sn. 3B**  
**NONE**

**Sch. P - Pt. 5T - Sn. 1**  
**NONE**

**Sch. P - Pt. 5T - Sn. 2**  
**NONE**

**Sch. P - Pt. 5T - Sn. 3**  
**NONE**

**Sch. P - Pt. 6C - Sn. 1**  
**NONE**

**Sch. P - Pt. 6C - Sn. 2**  
**NONE**

**Sch. P - Pt. 6D - Sn. 1**  
**NONE**

**Sch. P - Pt. 6D - Sn. 2**  
**NONE**

**Sch. P - Pt. 6E - Sn. 1**  
**NONE**

**Sch. P - Pt. 6E - Sn. 2**  
**NONE**

**Sch. P - Pt. 6H - Sn. 1A**  
**NONE**

**Sch. P - Pt. 6H - Sn. 2A**  
**NONE**

**Sch. P - Pt. 6H - Sn. 1B**  
**NONE**

**Sch. P - Pt. 6H - Sn. 2B**  
**NONE**

**Sch. P - Pt. 6M - Sn. 1**  
**NONE**

**Sch. P - Pt. 6M - Sn. 2**  
**NONE**

**Sch. P - Pt. 6N - Sn. 1  
NONE**

**Sch. P - Pt. 6N - Sn. 2  
NONE**

**Sch. P - Pt. 6O - Sn. 1  
NONE**

**Sch. P - Pt. 6O - Sn. 2  
NONE**

**Sch. P - Pt. 6R - Sn. 1A  
NONE**

**Sch. P - Pt. 6R - Sn. 2A  
NONE**

**Sch. P - Pt. 6R - Sn. 1B  
NONE**

**Sch. P - Pt. 6R - Sn. 2B  
NONE**

**Sch. P - Pt. 7A - Sn. 1  
NONE**

**Sch. P - Pt. 7A - Sn. 2  
NONE**

**Sch. P - Pt. 7A - Sn. 3  
NONE**

**Sch. P - Pt. 7A - Sn. 4  
NONE**

**Sch. P - Pt. 7A - Sn. 5  
NONE**

**Sch. P - Pt. 7B - Sn. 1  
NONE**

**Sch. P - Pt. 7B - Sn. 2  
NONE**

**Sch. P - Pt. 7B - Sn. 3  
NONE**

**Sch. P - Pt. 7B - Sn. 4  
NONE**

**Sch. P - Pt. 7B - Sn. 5  
NONE**

**Sch. P - Pt. 7B - Sn. 6  
NONE**

**Sch. P - Pt. 7B - Sn. 7  
NONE**

**SCHEDULE P INTERROGATORIES**

1. The following questions relate to yet-to-be-issued Extended Reporting Endorsements (EREs) arising from Death, Disability, or Retirement (DDR) provisions in Medical Professional Liability Claims-Made insurance policies. EREs provided for reasons other than DDR are not to be included.
- 1.1 Does the company issue Medical Professional Liability Claims-Made insurance policies that provide tail (also known as an extended reporting endorsement, or "ERE") benefits in the event of Death, Disability, or Retirement (DDR) at a reduced charge or at no additional cost? Yes [ ] No [X]  
 If the answer to question 1.1 is "no", leave the following questions blank. If the answer to question 1.1 is "yes", please answer the following questions.
- 1.2 What is the total amount of the reserve for that provision (DDR reserve), as reported, explicitly or not, elsewhere in this statement (in dollars)? .....
- 1.3 Does the company report any DDR reserve as Unearned Premium Reserve per SSAP #65? Yes [ ] No [X]
- 1.4 Does the company report any DDR reserve as loss or loss adjustment expense reserve? Yes [ ] No [X]
- 1.5 If the company reports DDR reserve as Unearned Premium Reserve, does that amount match the figure on the Underwriting and Investment Exhibit, Part 1A - Recapitulation of all Premiums (Page 7) Column 2, Lines 11.1 plus 11.2? Yes [ ] No [ ] N/A [X]
- 1.6 If the company reports DDR reserve as loss or loss adjustment expense reserve, please complete the following table corresponding to where these reserves are reported in Schedule P:

Years in Which Premiums Were Earned and Losses Were Incurred		DDR Reserve Included in Schedule P, Part 1F, Medical Professional Liability Column 24: Total Net Losses and Expenses Unpaid	
		1 Section 1: Occurrence	2 Section 2: Claims-Made
1.601	Prior.....	.....	.....
1.602	2010.....	.....	.....
1.603	2011.....	.....	.....
1.604	2012.....	.....	.....
1.605	2013.....	.....	.....
1.606	2014.....	.....	.....
1.607	2015.....	.....	.....
1.608	2016.....	.....	.....
1.609	2017.....	.....	.....
1.610	2018.....	.....	.....
1.611	2019.....	.....	.....
1.612	Totals.....	.0	.0

2. The definition of allocated loss adjustment expenses (ALAE) and, therefore, unallocated loss adjustment expenses (ULAE) was changed effective January 1, 1998. This change in definition applies to both paid and unpaid expenses. Are these expenses (now reported as "Defense and Cost Containment" and "Adjusting and Other") reported in compliance with these definitions in this statement? Yes [X] No [ ]
3. The Adjusting and Other expense payments and reserves should be allocated to the years in which the losses were incurred based on the number of claims reported, closed and outstanding in those years. When allocating Adjusting and Other expense between companies in a group or a pool, the Adjusting and Other expense should be allocated in the same percentage used for the loss amounts and the claim counts. For reinsurers, Adjusting and Other expense assumed should be reported according to the reinsurance contract. For Adjusting and Other expense incurred by reinsurers, or in those situations where suitable claim count information is not available, Adjusting and Other expense should be allocated by a reasonable method determined by the company and described in Interrogatory 7, below. Are they so reported in this statement? Yes [X] No [ ]

4. Do any lines in Schedule P include reserves that are reported gross of any discount to present value of future payments, and that are reported net of such discounts on Page 10? Yes [ ] No [X]

If yes, proper disclosure must be made in the Notes to Financial Statements, as specified in the Instructions. Also, the discounts must be reported in Schedule P - Part 1, Columns 32 and 33.

Schedule P must be completed gross of non-tabular discounting. Work papers relating to discount calculations must be available for examination upon request.

Discounting is allowed only if expressly permitted by the state insurance department to which this Annual Statement is being filed.

5. What were the net premiums in force at the end of the year for: (in thousands of dollars)
- 5.1 Fidelity .....
- 5.2 Surety .....
6. Claim count information is reported per claim or per claimant. (Indicate which). PER CLAIM  
 If not the same in all years, explain in Interrogatory 7.
- 7.1 The information provided in Schedule P will be used by many persons to estimate the adequacy of the current loss and expense reserves, among other things. Are there any especially significant events, coverage, retention or accounting changes that have occurred that must be considered when making such analyses? Yes [ ] No [X]
- 7.2 An extended statement may be attached.

# National Legacy Insurance Company SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories

States, Etc.	1 Active Status (a)	Gross Premiums, Including Policy and Membership Fees Less Return Premiums and Premiums on Policies Not Taken		4 Dividends Paid or Credited to Policyholders on Direct Business	5 Direct Losses Paid (Deducting Salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Finance and Service Charges not Included in Premiums	9 Direct Premiums Written for Federal Purchasing Groups (Incl. in Col. 2)
		2 Direct Premiums Written	3 Direct Premiums Earned						
1. Alabama.....AL	N								
2. Alaska.....AK	N								
3. Arizona.....AZ	N								
4. Arkansas.....AR	N								
5. California.....CA	N								
6. Colorado.....CO	N								
7. Connecticut.....CT	N								
8. Delaware.....DE	N								
9. District of Columbia.....DC	N								
10. Florida.....FL	N								
11. Georgia.....GA	N								
12. Hawaii.....HI	N								
13. Idaho.....ID	N								
14. Illinois.....IL	N								
15. Indiana.....IN	N								
16. Iowa.....IA	N								
17. Kansas.....KS	N								
18. Kentucky.....KY	N								
19. Louisiana.....LA	N								
20. Maine.....ME	N								
21. Maryland.....MD	N								
22. Massachusetts.....MA	N								
23. Michigan.....MI	N								
24. Minnesota.....MN	N								
25. Mississippi.....MS	N								
26. Missouri.....MO	N								
27. Montana.....MT	N								
28. Nebraska.....NE	N								
29. Nevada.....NV	N								
30. New Hampshire.....NH	N								
31. New Jersey.....NJ	N								
32. New Mexico.....NM	N								
33. New York.....NY	N								
34. North Carolina.....NC	N								
35. North Dakota.....ND	N								
36. Ohio.....OH	N								
37. Oklahoma.....OK	L								
38. Oregon.....OR	N								
39. Pennsylvania.....PA	N								
40. Rhode Island.....RI	N								
41. South Carolina.....SC	N								
42. South Dakota.....SD	N								
43. Tennessee.....TN	N								
44. Texas.....TX	N								
45. Utah.....UT	N								
46. Vermont.....VT	N								
47. Virginia.....VA	N								
48. Washington.....WA	N								
49. West Virginia.....WV	N								
50. Wisconsin.....WI	N								
51. Wyoming.....WY	N								
52. American Samoa.....AS	N								
53. Guam.....GU	N								
54. Puerto Rico.....PR	N								
55. US Virgin Islands.....VI	N								
56. Northern Mariana Islands.....MP	N								
57. Canada.....CAN	N								
58. Aggregate Other Alien.....OT	XXX	.0	.0	.0	.0	.0	.0	.0	.0
59. Totals.....	XXX	.0	.0	.0	.0	.0	.0	.0	.0

**DETAILS OF WRITE-INS**

58001.....	XXX								
58002.....	XXX								
58003.....	XXX								
58998. Summary of remaining write-ins for Line 58 from overflow page	XXX	.0	.0	.0	.0	.0	.0	.0	.0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above)	XXX	.0	.0	.0	.0	.0	.0	.0	.0

(a) Active Status Counts:

L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG.....	1	R - Registered - Non-domiciled RRGs.....	0
E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - See DSLI).....	0	Q - Qualified - Qualified or accredited reinsurer.....	0
D - Domestic Surplus Lines Insurer (DSL) - Reporting entities authorized to write surplus lines in the state of domicile.....	0	N - None of the above - Not allowed to write business in the state.....	56

(b) Explanation of Basis of Allocation of Premiums by States, etc.  
N/A

**SCHEDULE T - PART 2**

**INTERSTATE COMPACT - EXHIBIT OF PREMIUMS WRITTEN**

Allocated by States and Territories

States, Etc.		Direct Business Only					Totals
		1 Life (Group and Individual)	2 Annuities (Group and Individual)	3 Disability Income (Group and Individual)	4 Long-Term Care (Group and Individual)	5 Deposit-Type Contracts	
1.	Alabama.....AL						.0
2.	Alaska.....AK						.0
3.	Arizona.....AZ						.0
4.	Arkansas.....AR						.0
5.	California.....CA						.0
6.	Colorado.....CO						.0
7.	Connecticut.....CT						.0
8.	Delaware.....DE						.0
9.	District of Columbia.....DC						.0
10.	Florida.....FL						.0
11.	Georgia.....GA						.0
12.	Hawaii.....HI						.0
13.	Idaho.....ID						.0
14.	Illinois.....IL						.0
15.	Indiana.....IN						.0
16.	Iowa.....IA						.0
17.	Kansas.....KS						.0
18.	Kentucky.....KY						.0
19.	Louisiana.....LA						.0
20.	Maine.....ME						.0
21.	Maryland.....MD						.0
22.	Massachusetts.....MA						.0
23.	Michigan.....MI						.0
24.	Minnesota.....MN						.0
25.	Mississippi.....MS						.0
26.	Missouri.....MO						.0
27.	Montana.....MT						.0
28.	Nebraska.....NE						.0
29.	Nevada.....NV						.0
30.	New Hampshire.....NH						.0
31.	New Jersey.....NJ						.0
32.	New Mexico.....NM						.0
33.	New York.....NY						.0
34.	North Carolina.....NC						.0
35.	North Dakota.....ND						.0
36.	Ohio.....OH						.0
37.	Oklahoma.....OK						.0
38.	Oregon.....OR						.0
39.	Pennsylvania.....PA						.0
40.	Rhode Island.....RI						.0
41.	South Carolina.....SC						.0
42.	South Dakota.....SD						.0
43.	Tennessee.....TN						.0
44.	Texas.....TX						.0
45.	Utah.....UT						.0
46.	Vermont.....VT						.0
47.	Virginia.....VA						.0
48.	Washington.....WA						.0
49.	West Virginia.....WV						.0
50.	Wisconsin.....WI						.0
51.	Wyoming.....WY						.0
52.	American Samoa.....AS						.0
53.	Guam.....GU						.0
54.	Puerto Rico.....PR						.0
55.	US Virgin Islands.....VI						.0
56.	Northern Mariana Islands.....MP						.0
57.	Canada.....CAN						.0
58.	Aggregate Other Alien.....OT						.0
59.	Totals.....	.0	.0	.0	.0	.0	.0

**NONE**

## SCHEDULE Y – INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

## PART 1 – ORGANIZATIONAL CHART

Company Name	Holding	Reg. No.	Registered Office	FCA NAIC#	State Code
Randall & Quilter Investment Holdings Ltd.		47341	Clarendon House, 2 Church Street, Hamilton, HM11, Bermuda		
RQLM Limited	100%	48020	Crawford House, 50 Cedar Ave, Hamilton HM11, Bermuda		
FNF Title Company Limited	100%	C 55253	Development House, St. Anne Street, Floriana, FRN 9010, Malta		
R&Q Delta Company Limited	100%	10344871	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Ireland Company Limited by Guarantee	100%	10272	10 Earlsfort Terrace, Dublin 2, D02 T380 Ireland		
R&Q Ireland Claims Services Limited	66.6%	505967	10 Earlsfort Terrace, Dublin 2, D02 T380 Ireland		
R&Q Gamma Company Limited	100%	1335239	71 Fenchurch Street, London EC3M 4BS, England	202793	
RQIH Limited	100%	3671097	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Oast Limited	100%	3593065	71 Fenchurch Street, London, EC3M 4BS, England		
Randall & Quilter PS Holdings Inc	100%	83-1770410	c/o Cogency Global Inc, 850 New Burton Road, Suite 201, City of Dover, County of Kent DE 19904		
Randall & Quilter Canada Holdings Limited	100%	753780-8	40 King St West, Suite 5800, PO Box 1011, Toronto ON, M5H 3S1, Canada		
R&Q Risk Services Canada Limited	100%	753781-6	40 King St West, Suite 5800, PO Box 1011, Toronto ON, M5H 3S1, Canada		
Randall & Quilter II Holdings Limited	100%	7659577	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Re (Bermuda) Limited	100%	41047	Clarendon House, 2 Church St, Hamilton. HM11 Bermuda		
R&Q Bermuda (SAC) Limited	100%	30104	Clarendon House, 2 Church St, Hamilton. HM11 Bermuda		
Berda Developments Limited	100%	1848	Clarendon House, 2 Church Street, Hamilton, HM11, Bermuda		
Distinguished Re Ltd	100%	10875	First Floor, Trident House, Lower Broad Street, Bridgetown, Barbados		
R&Q Capital No. 1 Limited	95%	7382921	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Capital No.6 Limited	100%	7066541	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Capital No.7 Limited	100%	7066562	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Reinsurance Company (UK) Limited	100%	1315641	71 Fenchurch Street, London, EC3M 4BS, England	202188	
La Licorne Compagnie de Reassurances SA	100%	316 695 469	26-26 Rue des Londres, 75009 Paris, France		
R&Q Epsilon Insurance Company SE	100%	SE000120	71 Fenchurch Street, London, EC3M 4BS		
Capstan Insurance Company Limited	100%	14527	Maison Trinity, Trinity Square, St Peter Port, Guernsey, GY1 4AT	34889	
Hickson Insurance Limited	100%	7256	3rd Floor, St. James's Chambers, 64a/65 Athol Street, Douglas Isle of Man IM1 6JE		
R&Q Malta Holdings Limited	100%	C59458	3 <sup>rd</sup> Floor, Development House, St Anne Street, Floriana, FRN 9010, Malta		
Accredited Insurance (Europe) Limited	100%	C59505	3 <sup>rd</sup> Floor, Development House, St Anne Street, Floriana, FRN 9010, Malta		
R&Q Eta Company Limited	100%	5008295	71 Fenchurch Street, London, EC3M 4BS		
R&Q Insurance (Europe) Limited	100%	C78902	3rd Floor, Development House, St Anne Street, Floriana, FRN 9010, Malta		
R & Q Cyprus Ltd	100%	HE 64173	205 Louloupis Court, 5th Floor, Flat/Office 501, 3036 Linassol, Cyprus		
R&Q Alpha Company SE	100%	SE11	171 Old Bakery Street, Valletta, VLT 1455, Malta		
R&Q Beta Company SE	100%	SE12	171 Old Bakery Street, Valletta, VLT 1455, Malta		
Sandell Holdings Ltd	100%	49850	Canon's Court, 22 Victoria Street, Hamilton, HM12 Bermuda		
Sandell Re Ltd	100%	49851	Canon's Court, 22 Victoria Street, Hamilton, HM12 Bermuda		
Randall & Quilter IS Holdings Limited	100%	7659581	71 Fenchurch Street, London, EC3M 4BS, England		
R&Quiem Financial Services Limited	100%	2192234	71 Fenchurch Street, London, EC3M 4BS, England	134699	
R&Q Central Services Limited	100%	4179375	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Insurance Services Limited	100%	1097308	71 Fenchurch Street, London, EC3M 4BS, England	314329	
Callidus Solutions Limited	51%	9939234	54 Fenchurch Street, London, EC3M 3JY		
Randall & Quilter America Holdings Inc.	100%	13-3496014	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		DE
Accredited Holding Corporation	100%	59-0868428	4798 New Broad Street, Suite 200, Orlando, FL 32814		FL
Accredited Surety and Casualty Company, Inc.	100%	59-1362150	4798 New Broad Street, Suite 200, Orlando, FL 32814	26379	FL



## SCHEDULE Y – INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

## PART 1 – ORGANIZATIONAL CHART

Accredited Group Agency, Inc.	100%	59-3392908	4798 New Broad Street, Suite 200, Orlando, FL 32814		FL
Accredited Bond Agencies, Inc.	100%	59-3457839	4798 New Broad Street, Suite 200, Orlando, FL 32814		FL
Randall & Quilter Healthcare Holdings Inc.	100%	47-1219882	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		DE
R&Q Healthcare Interests LLC	100%	38-3934576	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		DE
R&Q Reinsurance Company	100%	23-1740414	Two Logan Square, Philadelphia, PA 19103	22705	PA
R&Q RI Insurance Company	100%	82-1212894	c/o Partridge, Snow & Hahn LLP, 40 Westminster Street, Suite 1100, Providence, RI 02903, USA	16206	RI
R&Q Quest PCC, LLC	100%	90-0897620	1333 H Street NW, Suite 820E, Washington DC, DC 20005, USA	RE132	DC
Transport Insurance Company	100%	75-0784127	1300 East 9 <sup>th</sup> Street, Cleveland, OH 44114	33014	OH
ICDC, Ltd.	100%	52-1557469	961 Dorset Street, South Burlington, VT 05403, USA		VT
GLOBAL U.S. Holdings, Inc	100%	13-3907460	340 Madison Avenue, 19th Floor, New York, United States		NY
GLOBAL Reinsurance Corporation of America	100%	13-5009848	340 Madison Avenue, 19th Floor, New York, United States	21032	NY
Grafton US Holdings Inc.	80%	45-0886689	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		DE
LBL Acquisitions, LLC	100%	38-3932966	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		DE
Risk Transfer Underwriting Inc.	100%	45-0981421	330 Roberts Street, Suite 203, East Hartford, CT 06180-3654		CT
R&Q Services Holding Inc.	100%	45-3265690	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		DE
Excess and Treaty Management Corporation	100%	41-1568621	Two Logan Square, Suite 600, Philadelphia, PA 19103 USA		NY
Requiem America Inc.	100%	36-3293537	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		IL
Syndicated Services Company Inc.	100%	36-3786990	c/o Cogency, 615 South DuPont Highway, Dover DE 19901, USA		IL
R&Q Solutions LLC	100%	13-3978252	Two Logan Square, Suite 600, Philadelphia, PA 19103 USA		DE
RSI Solutions International Inc.	100%	13-4131334	Two Logan Square, Suite 600, Philadelphia, PA 19103 USA		PA
National Legacy Insurance Company	100%	83-4075549	Two Logan Square, Suite 600 , Philadelphia, PA 19103 USA	16660	OK
Randall & Quilter Captive Holdings Limited	100%	7650726	71 Fenchurch Street, London, EC3M 4BS, England		
R&Q Quest Management Services (Cayman) Limited	100%	27441	Lainston International Management (Cayman) Ltd., Governors Square, P O BOX 31298, Grand Cayman, KY1-1206, Cayman Islands, British West Indies		
R&Q Quest Insurance Limited	100%	48257	22 Canon's Court, 22 Victoria Street, Hamilton HM12, Bermuda		
R&Q Quest (SAC) Limited	100%	36230	Clarendon House, 2 Church Street, Hamilton, HM11, Bermuda		
R&Q Insurance Management (IOM) Limited	100%	127029C	3rd Floor, Development House, St Anne Street, Floriana, FRN 9010, Malta		
Pender Mutual insurance Company Limited	100%	107718C	3rd Floor, St. James's Chambers, 64a/65 Athol Street, Douglas Isle of Man IM1 6JE		
R&Q Insurance Management (Gibraltar) Limited	100%	58192	Suite 2B, Mansion House, 143 Main Street, GX11 1AA		
Randall & Quilter Underwriting Management Holdings Limited	100%	7504909	71 Fenchurch Street, London EC3M 4BS, England		
R&Q MGA Limited	100%	5337045	71 Fenchurch Street, London EC3M 4BS, England	440543	
Trilogy Managing General Agents Limited	80%	8397254	71 Fenchurch Street, London EC3M 4BS, England		
R&Q Commercial Risk Services Limited	100%	7313009	71 Fenchurch Street, London EC3M 4BS, England	530938	
R&Q Munro Services Company Limited	100%	3937013	71 Fenchurch Street, London EC3M 4BS, England		
R&Q Munro MA Limited	100%	8576587	71 Fenchurch Street, London EC3M 4BS, England		

**SCHEDULE Y**

**PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM**

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
<b>Members</b>															
			N/A	N/A	N/A	London Stock Exchange (AIM)	Randall & Quilter Investment Holdings Ltd.....	BMU	NIA	Gary Channon and Sedef Channon (via their 99.34% (62.64% and 36.8% respectively) holdings in Channon Holdings Limited and its 84.91% holding in Phoenix Asset Management Partners Limited)	Ownership/ Management	0.199	N/A	N	
			N/A	N/A	N/A		RQIH Limited.....	GBR	NIA	Randall & Quilter Investment Holdings Ltd.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Oast Limited.....	GBR	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Randall & Quilter II Holdings Limited.....	GBR	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Randall & Quilter IS Holdings Limited.....	GBR	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			13-3496014	N/A	N/A		Randall & Quilter America Holdings Inc.....	USA	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Randall & Quilter Captive Holdings Limited.....	GBR	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Randall & Quilter Underwriting Management Holdings Limited	GBR	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Randall & Quilter Canada Holdings Limited.....	CAN	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			83-1770410	N/A	N/A		Randall & Quilter PS Holdings Inc.....	USA	NIA	RQIH Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Risk Services Canada Limited.....	CAN	NIA	Randall & Quilter Canada Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		RQLM Limited.....	BMU	NIA	Randall & Quilter Investment Holdings Ltd.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Insurance Management (Gibraltar) Limited	GIB	NIA	Randall & Quilter Captive Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Quest (SAC) Limited.....	BMU	NIA	Randall & Quilter Captive Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Quest Insurance Limited.....	BMU	NIA	Randall & Quilter Captive Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Quest Management Services (Cayman) Limited	CYM	NIA	Randall & Quilter Captive Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Insurance Management (IOM) Limited.....	IMN	NIA	Randall & Quilter Captive Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Pender Mutual Insurance Company Limited.....	IMN	NIA	R&Q Insurance Management (IOM) Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Central Services Limited.....	GBR	NIA	Randall & Quilter IS Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Insurance Services Limited.....	GBR	IA	Randall & Quilter IS Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Quiem Financial Services Limited.....	GBR	NIA	Randall & Quilter IS Holdings Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Callidus Solutions Limited.....	GBR	NIA	Randall & Quilter IS Holdings Limited.....	Ownership	0.510	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q MGA Limited.....	GBR	NIA	Randall & Quilter Underwriting Management Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Munro Services Company Limited.....	GBR	IA	Randall & Quilter Underwriting Management Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Munro MA Limited.....	GBR	IA	Randall & Quilter Underwriting Management Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		R&Q Commercial Risk Services Limited.....	GBR	NIA	R&Q MGA Limited.....	Ownership	1.000	Randall & Quilter Investment Holdings Ltd.....	N	
			N/A	N/A	N/A		Trilogy Managing General Agencts Limited.....	GBR	IA	R&Q MGA Limited.....	Ownership	0.800	Randall & Quilter Investment Holdings Ltd.....	N	

**SCHEDULE Y**

**PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM**

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*	
97.1			N/A	N/A	N/A	N/A	La Licorne Compagnie de Reassurances SA	FRA	IA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Capital No.1 Limited	GBR	NIA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Malta Holdings Limited	MLT	IA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	Accredited Insurance (Europe) Limited	MLT	IA	R&Q Malta Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Reinsurance Company (UK) Limited	GBR	IA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	Capstan Insurance Company Limited	GGY	IA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	Hickson Insurance Limited	IMN	IA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Re (Bermuda) Limited	BMU	NIA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Capital No.6 Limited	GBR	NIA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Capital No.7 Limited	GBR	NIA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			N/A	N/A	N/A	N/A	R&Q Epsilon Insurance Company SE	GBR	IA	Randall & Quilter II Holdings Limited	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
				52-1557469	N/A	N/A	N/A	ICDC, Ltd	USA	IA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
				47-1219882	N/A	N/A	N/A	Randall & Quilter Healthcare Holdings Inc	USA	NIA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
				38-3934576	N/A	N/A	N/A	R&Q Healthcare Interests LLC	USA	NIA	Randall & Quilter Healthcare Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
				45-0886689	N/A	N/A	N/A	Grafton US Holdings Inc	USA	NIA	Randall & Quilter America Holdings Inc	Ownership	0.800	Randall & Quilter Investment Holdings Ltd	N	
				38-3932966	N/A	N/A	N/A	LBL Acquisitions. LLC	USA	NIA	Grafton US Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
				45-0981421	N/A	N/A	N/A	Risk Transfer Underwriting Inc	USA	NIA	Grafton US Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
	4234	Randall & Quilter Investment Grp	22705	23-1740414	N/A	N/A	N/A	R&Q Reinsurance Company	USA	IA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
	4234	Randall & Quilter Investment Grp	33014	75-0784127	1302457	N/A	N/A	Transport Insurance Company	USA	IA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
				45-3265690	N/A	N/A	N/A	R&Q Services Holding Inc	USA	NIA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N	
			59-0868428	N/A	N/A	N/A	Accredited Holding Corporation	USA	NIA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			13-3907460	N/A	N/A	N/A	GLOBAL U.S. Holdings, Inc	USA	NIA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			90-0897620	N/A	N/A	N/A	R&Q Quest PCC, LLC	USA	NIA	Randall & Quilter America Holdings Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
4234	Randall & Quilter Investment Grp	26379	59-1362150	N/A	N/A	N/A	Accredited Surety and Casualty Company, Inc.	USA	IA	Accredited Holding Corporation	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			59-3392908	N/A	N/A	N/A	Accredited Group Agency, Inc.	USA	NIA	Accredited Holding Corporation	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			59-3457839	N/A	N/A	N/A	Accredited Bond Agencies, Inc.	USA	NIA	Accredited Holding Corporation	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			41-1568621	N/A	N/A	N/A	Excess and Treaty Management Corporation	USA	NIA	R&Q Services Holding Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			13-3978252	N/A	N/A	N/A	R&Q Solutions LLC	USA	NIA	R&Q Services Holding Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			13-4131334	N/A	N/A	N/A	RSI Solutions International Inc	USA	NIA	R&Q Solutions LLC	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
4234	Randall & Quilter Investment Grp	21032	13-5009848	N/A	N/A	N/A	GLOBAL Reinsurance Corporation of America	USA	IA	GLOBAL U.S. Holdings, Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			36-3293537	N/A	N/A	N/A	Requiem America Inc	USA	NIA	R&Q Services Holding Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		
			36-3786990	N/A	N/A	N/A	Syndicated Services Company Inc	USA	NIA	Requiem America Inc	Ownership	1.000	Randall & Quilter Investment Holdings Ltd	N		

## SCHEDULE Y

### PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Alpha Company SE.....	MLT.....	IA.....	R&Q Malta Holdings Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Beta Company SE.....	MLT.....	IA.....	R&Q Malta Holdings Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	FNF Title Company Limited.....	MLT.....	IA.....	Randall & Quilter Investment Holdings Ltd.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Delta Company Limited.....	GBR.....	NIA.....	Randall & Quilter Investment Holdings Ltd.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Ireland Company Limited By Guarantee..	IRL.....	NIA.....	R&Q Delta Company Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Ireland Claims Services Limited .....	IRL.....	NIA.....	R&Q Ireland Company Limited By Guarantee.	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Gamma Company Limited.....	GBR.....	IA.....	Randall & Quilter Investment Holdings Ltd.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R&Q Insurance (Europe) Limited.....	MLT.....	IA.....	R&Q Malta Holdings Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
			N/A.....	N/A.....	N/A.....	N/A.....	R & Q Cyprus Ltd.....	CYP.....	IA.....	R&Q Malta Holdings Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
97.2	4234	Randall & Quilter Investment Grp	16206..	82-1212894..	N/A.....	N/A.....	R&Q RI Insurance Company.....	USA.....	IA.....	Randall & Quilter America Holdings Inc.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
				0.....	N/A.....	N/A.....	R&Q Eta Company Limited.....	GBR.....	IA.....	Accredited Insurance (Europe) Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
				N/A.....	N/A.....	N/A.....	R&Q Bermuda (SAC) Limited.....	BMU.....	IA.....	R&Q Re (Bermuda) Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
				N/A.....	N/A.....	N/C.....	Berda Developments Limited.....	BMU.....	IA.....	R&Q Re (Bermuda) Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
				N/A.....	N/A.....	N/C.....	Distinguished Re.....	BMU.....	IA.....	R&Q Re (Bermuda) Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
				N/A.....	N/A.....	N/C.....	Sandell Holdings Ltd.....	BMU.....	IA.....	Randall & Quilter II Holdings Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
				N/A.....	N/A.....	N/C.....	Sandell Re Ltd.....	BMU.....	IA.....	Randall & Quilter II Holdings Limited.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	
4234	Randall & Quilter Investment Grp	16660..	83-4075549..	N/A.....	N/C.....	N/A.....	National Legacy Insurance Company.....	USA.....	IA.....	Randall & Quilter America Holdings Inc.....	Ownership.....	.....1.000	Randall & Quilter Investment Holdings Ltd.....	.....N.....	

## SCHEDULE Y

### PART 2 - SUMMARY OF INSURER'S TRANSACTIONS WITH ANY AFFILIATES

1	2	3	4	5	6	7	8	9	10	11	12	13
NAIC Company Code	ID Number	Names of Insurers and Parent, Subsidiaries or Affiliates	Shareholder Dividends	Capital Contributions	Purchases, Sales or Exchanges of Loans, Securities, Real Estate, Mortgage Loans or Other Investments	Income/ (Disbursements) Incurred in Connection with Guarantees or Undertakings for the Benefit of any Affiliate(s)	Management Agreements and Service Contracts	Income/ (Disbursements) Incurred under Reinsurance Agreements	*	Any Other Material Activity Not in the Ordinary Course of the Insurer's Business	Totals	Reinsurance Recoverable/ (Payable) on Losses and/or Reserve Credit Taken/ (Liability)
<b>Affiliated Transactions</b>												
	13-3496014	Randall & Quilter America Holdings Inc	15,000,000	(142,787,826)			3,167,221				(124,620,605)	
	45-3265690	R&Q Services Holding Inc		23,223,488							23,223,488	
	13-3978585	R&Q Solutions LLC		17,405,471			4,403,162				21,808,633	
16206	82-1212894	R&Q RI Insurance Company					(4,160)				(4,160)	
33014	75-0784127	Transport Insurance Company					(572,974)				(572,974)	
22705	23-1740414	R&Q Reinsurance Company					(2,160,117)				(2,160,117)	
	13-3907460	Global U.S. Holdings Inc		86,515,198							86,515,198	
21032	13-5009848	GLOBAL Reinsurance Corporation of America		(6,015,198)			(516,676)				(6,531,874)	
	45-0886689	Grafton US Holdings Inc		280,000							280,000	
	52-1557469	ICDC, Ltd					(37,803)				(37,803)	
	59-0868428	Accredited Holding Corporation		750,000			12,780				762,780	
	59-3457839	Accredited Bond Agencies, Inc					2,659,751				2,659,751	
	59-3392908	Accredited Group Agency, Inc					29,571				29,571	
26379	59-1362150	Accredited Surety and Casualty Company	(15,000,000)	20,628,867			(6,980,755)				(1,351,888)	
9999999	Control Totals		0	0	0	0	0	0	XXX	0	0	0

**SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES**

The following supplemental reports are required to be filed as part of your statement filing unless specifically waived by the domiciliary state. However, in the event that your domiciliary state waives the filing requirement, your response of WAIVED to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

**MARCH FILING**

1. Will an actuarial opinion be filed by March 1?
2. Will the Supplemental Compensation Exhibit be filed with the state of domicile by March 1?
3. Will the confidential Risk-Based Capital Report be filed with the NAIC by March 1?
4. Will the confidential Risk-Based Capital Report be filed with the state of domicile, if required, by March 1?

**Responses**

WAIVED

YES

YES

YES

**APRIL FILING**

5. Will the Insurance Expense Exhibit be filed with the state of domicile and the NAIC by April 1?
6. Will the Management's Discussion and Analysis be filed by April 1?
7. Will the Supplemental Investment Risks Interrogatories be filed by April 1?

YES

YES

YES

**MAY FILING**

8. Will this company be included in a combined annual statement that is filed with the NAIC by May 1?

NO

**JUNE FILING**

9. Will an audited financial report be filed by June 1?
10. Will Accountants Letter of Qualifications be filed with the state of domicile and electronically with the NAIC by June 1?

WAIVED

WAIVED

**AUGUST FILING**

11. Will the regulator-only (non-public) Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile and electronically with the NAIC (as a regulator-only non-public document) by August 1?

WAIVED

The following supplemental reports are required to be filed as part of your statement filing **if your company is engaged in the type of business covered by the supplement. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below.**

If the supplement is required of your company but is not being filed for whatever reason, enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

**MARCH FILING**

12. Will Schedule SIS (Stockholder Information Supplement) be filed with the state of domicile by March 1?
13. Will the Financial Guaranty Insurance Exhibit be filed by March 1?
14. Will the Medicare Supplement Insurance Experience Exhibit be filed with the state of domicile and the NAIC by March 1?
15. Will Supplement A to Schedule T (Medical Professional Liability Supplement) be filed by March 1?
16. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC by March 1?
17. Will the Premiums Attributed to Protected Cells Exhibit be filed by March 1?
18. Will the Reinsurance Summary Supplemental Filing for General Interrogatory 9 be filed with the state of domicile and the NAIC by March 1?
19. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC by March 1?
20. Will the confidential Actuarial Opinion Summary be filed with the state of domicile, if required, by March 15 (or the date otherwise specified)?
21. Will the Reinsurance Attestation Supplement be filed with the state of domicile and the NAIC by March 1?
22. Will the Exceptions to the Reinsurance Attestation Supplement be filed with the state of domicile by March 1?
23. Will the Bail Bond Supplement be filed with the state of domicile and the NAIC by March 1?
24. Will the Director and Officer Insurance Coverage Supplement be filed with the state of domicile and the NAIC by March 1?
25. Will an approval from the reporting entity's state of domicile for relief related to the five-year rotation requirement for lead audit partner be filed electronically with the NAIC by March 1?
26. Will an approval from the reporting entity's state of domicile for relief related to the one-year cooling off period for independent CPA be filed electronically with the NAIC by March 1?
27. Will an approval from the reporting entity's state of domicile for relief related to the Requirements for Audit Committees be filed electronically with the NAIC by March 1?
28. Will the Supplemental Schedule for Reinsurance Counterparty Reporting Exception - Asbestos and Pollution Contracts be filed with the state of domicile and the NAIC by March 1?

NO

NO

NO

NO

NO

NO

NO

NO

NO

NO

YES

NO

NO

NO

NO

NO

NO

NO

NO

**APRIL FILING**

29. Will the Credit Insurance Experience Exhibit be filed with state of domicile and the NAIC by April 1?
30. Will the Long-Term Care Experience Reporting Forms be filed with the state of domicile and the NAIC by April 1?
31. Will the Accident and Health Policy Experience Exhibit be filed by April 1?
32. Will the Supplemental Health Care Exhibit (Parts 1, 2 and 3) be filed with the state of domicile and the NAIC by April 1?
33. Will the regulator-only (non-public) Supplemental Health Care Exhibit's Expense Allocation Report be filed with the state of domicile and the NAIC by April 1?
34. Will the Cybersecurity and Identity Theft Insurance Coverage Supplement be filed with the state of domicile and the NAIC by April 1?
35. Will the Life, Health & Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit be filed with the state of domicile and the NAIC by April 1?
36. Will the Adjustments to the Life, Health & Annuity Guaranty Association Model Act Assessment Base Reconciliation Exhibit (if required) be filed with state of domicile and the NAIC by April 1?

NO

NO

NO

NO

NO

NO

NO

NO

NO

NO

**AUGUST FILING**

37. Will Management's Report of Internal Control Over Financial Reporting be filed with the state of domicile by August 1?

NO

# SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing unless specifically waived by the domiciliary state. However, in the event that your domiciliary state waives the filing requirement, your response of WAIVED to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

**EXPLANATION:**

1. OK approved exemption

**BAR CODE:**



2.

3.

4.

5.

6.

7.

8.

9. OK approved exemption



10. OK approved exemption



11. OK approved exemption



12. The data for this supplement is not required to be filed.



13. The data for this supplement is not required to be filed.



14. The data for this supplement is not required to be filed.



15. The data for this supplement is not required to be filed.



16. The data for this supplement is not required to be filed.



17. The data for this supplement is not required to be filed.



18. The data for this supplement is not required to be filed.



19. The data for this supplement is not required to be filed.

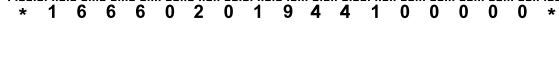


20. The data for this supplement is not required to be filed.



21.

22. The data for this supplement is not required to be filed.



23. The data for this supplement is not required to be filed.



24. The data for this supplement is not required to be filed.



25. The data for this supplement is not required to be filed.



26. The data for this supplement is not required to be filed.



27. The data for this supplement is not required to be filed.



28. The data for this supplement is not required to be filed.



29. The data for this supplement is not required to be filed.



30. The data for this supplement is not required to be filed.



31. The data for this supplement is not required to be filed.



32. The data for this supplement is not required to be filed.



33. The data for this supplement is not required to be filed.



34. The data for this supplement is not required to be filed.



## SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing unless specifically waived by the domiciliary state. However, in the event that your domiciliary state waives the filing requirement, your response of WAIVED to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

35. The data for this supplement is not required to be filed.



36. The data for this supplement is not required to be filed.



37. The data for this supplement is not required to be filed.





**Overflow Page  
NONE**

**Overflow Page  
NONE**

## SUMMARY INVESTMENT SCHEDULE

Investment Categories	Gross Investment Holdings		Admitted Assets as Reported in the Annual Statement			
	1 Amount	2 Percentage of Column 1 Line 13	3 Amount	4 Securities Lending Reinvested Collateral Amount	5 Total (Col. 3 + 4) Amount	6 Percentage of Column 5 Line 13
1. Long-Term Bonds (Schedule D, Part 1):						
1.01 U.S. Governments.....		0.0			0	0.0
1.02 All Other Governments.....		0.0			0	0.0
1.03 U.S. States, Territories and Possessions, etc., Guaranteed.....		0.0			0	0.0
1.04 U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed.....		0.0			0	0.0
1.05 U.S. Special Revenue and Special Assessment Obligations, etc., Non-Guaranteed.....		0.0			0	0.0
1.06 Industrial and Miscellaneous.....		0.0			0	0.0
1.07 Hybrid Securities.....		0.0			0	0.0
1.08 Parent, Subsidiaries and Affiliates.....		0.0			0	0.0
1.09 SVO Identified Funds.....		0.0			0	0.0
1.10 Unaffiliated Bank Loans.....		0.0			0	0.0
1.11 Total Long-Term Bonds.....	0	0.0	0	0	0	0.0
2. Preferred Stocks (Schedule D, Part 2, Section 1):						
2.01 Industrial and Misc. (Unaffiliated).....		0.0			0	0.0
2.02 Parent, Subsidiaries and Affiliates.....		0.0			0	0.0
2.03 Total Preferred Stock.....	0	0.0	0	0	0	0.0
3. Common Stocks (Schedule D, Part 2, Section 2):						
3.01 Industrial and Miscellaneous Publicly Traded (Unaffiliated).....		0.0			0	0.0
3.02 Industrial and Miscellaneous Other (Unaffiliated).....		0.0			0	0.0
3.03 Parent, Subsidiaries and Affiliates Publicly Traded.....		0.0			0	0.0
3.04 Parent, Subsidiaries and Affiliates Other.....		0.0			0	0.0
3.05 Mutual Funds.....		0.0			0	0.0
3.06 Unit Investment Trusts.....		0.0			0	0.0
3.07 Closed-End Funds.....		0.0			0	0.0
3.08 Total Common Stocks.....	0	0.0	0	0	0	0.0
4. Mortgage Loans (Schedule B):						
4.01 Farm Mortgages.....		0.0			0	0.0
4.02 Residential Mortgages.....		0.0			0	0.0
4.03 Commercial Mortgages.....		0.0			0	0.0
4.04 Mezzanine Real Estate Loans.....		0.0			0	0.0
4.05 Total Mortgage Loans.....	0	0.0	0	0	0	0.0
5. Real Estate (Schedule A):						
5.01 Properties Occupied by Company.....		0.0			0	0.0
5.02 Properties Held for Production of Income.....		0.0			0	0.0
5.03 Properties Held for Sale.....		0.0			0	0.0
5.04 Total Real Estate.....	0	0.0	0	0	0	0.0
6. Cash, Cash Equivalents, and Short-Term Investments:						
6.01 Cash (Schedule E, Part 1).....	4,719,741	94.1	4,719,741		4,719,741	94.1
6.02 Cash Equivalents (Schedule E, Part 2).....	295,099	5.9	295,099		295,099	5.9
6.03 Short-Term Investments (Schedule DA).....		0.0			0	0.0
6.04 Total Cash, Cash Equivalents, and Short-Term Investments.....	5,014,840	100.0	5,014,840	0	5,014,840	100.0
7. Contract Loans.....		0.0			0	0.0
8. Derivatives (Schedule DB).....		0.0			0	0.0
9. Other Invested Assets (Schedule BA).....		0.0			0	0.0
10. Receivables for Securities.....		0.0			0	0.0
11. Securities Lending (Schedule DL, Part 1).....		0.0		XXX	XXX	XXX
12. Other Invested Assets (Page 2, Line 11).....		0.0			0	0.0
13. Total Invested Assets.....	5,014,840	100.0	5,014,840	0	5,014,840	100.0

**Sch. A - Verification**  
**NONE**

**Sch. B - Verification**  
**NONE**

**Sch. BA - Verification**  
**NONE**

**Sch. D - Verification**  
**NONE**

**Sch. D - Summary by Country**  
**NONE**

**SCHEDULE D - PART 1A - SECTION 1**

Quality and Maturity Distribution of All Bonds Owned December 31, At Book/Adjusted Carrying Values By Major Types of Issues and NAIC Designations

NAIC Designation	1 1 Year or Less	2 Over 1 Year Through 5 Years	3 Over 5 Years Through 10 Years	4 Over 10 Years Through 20 Years	5 Over 20 Years	6 No Maturity Date	7 Total Current Year	8 Column 7 as a % of Line 11.7	9 Total from Column 7 Prior Year	10 % from Col. 8 Prior Year	11 Total Publicly Traded	12 Total Privately Placed (a)
<b>1. U.S. Governments</b>												
1.1 NAIC 1.....	295,099					.XXX	295,099	100.0		.00		295,099
1.2 NAIC 2.....						.XXX	0	0.0		.00		
1.3 NAIC 3.....						.XXX	0	0.0		.00		
1.4 NAIC 4.....						.XXX	0	0.0		.00		
1.5 NAIC 5.....						.XXX	0	0.0		.00		
1.6 NAIC 6.....						.XXX	0	0.0		.00		
1.7 Totals.....	295,099	0	0	0	0	.XXX	295,099	100.0	0	.00	0	295,099
<b>2. All Other Governments</b>												
2.1 NAIC 1.....						.XXX	0	0.0		.00		
2.2 NAIC 2.....						.XXX	0	0.0		.00		
2.3 NAIC 3.....						.XXX	0	0.0		.00		
2.4 NAIC 4.....						.XXX	0	0.0		.00		
2.5 NAIC 5.....						.XXX	0	0.0		.00		
2.6 NAIC 6.....						.XXX	0	0.0		.00		
2.7 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	.00	0	0
<b>3. U.S. States, Territories and Possessions, etc., Guaranteed</b>												
3.1 NAIC 1.....						.XXX	0	0.0		.00		
3.2 NAIC 2.....						.XXX	0	0.0		.00		
3.3 NAIC 3.....						.XXX	0	0.0		.00		
3.4 NAIC 4.....						.XXX	0	0.0		.00		
3.5 NAIC 5.....						.XXX	0	0.0		.00		
3.6 NAIC 6.....						.XXX	0	0.0		.00		
3.7 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	.00	0	0
<b>4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed</b>												
4.1 NAIC 1.....						.XXX	0	0.0		.00		
4.2 NAIC 2.....						.XXX	0	0.0		.00		
4.3 NAIC 3.....						.XXX	0	0.0		.00		
4.4 NAIC 4.....						.XXX	0	0.0		.00		
4.5 NAIC 5.....						.XXX	0	0.0		.00		
4.6 NAIC 6.....						.XXX	0	0.0		.00		
4.7 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	.00	0	0
<b>5. U.S. Special Revenue &amp; Special Assessment Obligations, etc., Non-Guaranteed</b>												
5.1 NAIC 1.....						.XXX	0	0.0		.00		
5.2 NAIC 2.....						.XXX	0	0.0		.00		
5.3 NAIC 3.....						.XXX	0	0.0		.00		
5.4 NAIC 4.....						.XXX	0	0.0		.00		
5.5 NAIC 5.....						.XXX	0	0.0		.00		
5.6 NAIC 6.....						.XXX	0	0.0		.00		
5.7 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	.00	0	0

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**SCHEDULE D - PART 1A - SECTION 1 (continued)**

Quality and Maturity Distribution of All Bonds Owned December 31, At Book/Adjusted Carrying Values By Major Types of Issues and NAIC Designations

NAIC Designation	1 1 Year or Less	2 Over 1 Year Through 5 Years	3 Over 5 Years Through 10 Years	4 Over 10 Years Through 20 Years	5 Over 20 Years	6 No Maturity Date	7 Total Current Year	8 Column 7 as a % of Line 11.7	9 Total from Column 7 Prior Year	10 % from Col. 8 Prior Year	11 Total Publicly Traded	12 Total Privately Placed (a)
<b>6. Industrial and Miscellaneous (unaffiliated)</b>												
6.1 NAIC 1.....						XXX.....	0	0.0		0.0		
6.2 NAIC 2.....						XXX.....	0	0.0		0.0		
6.3 NAIC 3.....						XXX.....	0	0.0		0.0		
6.4 NAIC 4.....						XXX.....	0	0.0		0.0		
6.5 NAIC 5.....						XXX.....	0	0.0		0.0		
6.6 NAIC 6.....						XXX.....	0	0.0		0.0		
6.7 Totals.....	0	0	0	0	0	XXX.....	0	0.0	0	0.0	0	0
<b>7. Hybrid Securities</b>												
7.1 NAIC 1.....						XXX.....	0	0.0		0.0		
7.2 NAIC 2.....						XXX.....	0	0.0		0.0		
7.3 NAIC 3.....						XXX.....	0	0.0		0.0		
7.4 NAIC 4.....						XXX.....	0	0.0		0.0		
7.5 NAIC 5.....						XXX.....	0	0.0		0.0		
7.6 NAIC 6.....						XXX.....	0	0.0		0.0		
7.7 Totals.....	0	0	0	0	0	XXX.....	0	0.0	0	0.0	0	0
<b>8. Parent, Subsidiaries and Affiliates</b>												
8.1 NAIC 1.....						XXX.....	0	0.0		0.0		
8.2 NAIC 2.....						XXX.....	0	0.0		0.0		
8.3 NAIC 3.....						XXX.....	0	0.0		0.0		
8.4 NAIC 4.....						XXX.....	0	0.0		0.0		
8.5 NAIC 5.....						XXX.....	0	0.0		0.0		
8.6 NAIC 6.....						XXX.....	0	0.0		0.0		
8.7 Totals.....	0	0	0	0	0	XXX.....	0	0.0	0	0.0	0	0
<b>9. SVO Identified Funds</b>												
9.1 NAIC 1.....	XXX	XXX	XXX	XXX	XXX		0	0.0		0.0		
9.2 NAIC 2.....	XXX	XXX	XXX	XXX	XXX		0	0.0		0.0		
9.3 NAIC 3.....	XXX	XXX	XXX	XXX	XXX		0	0.0		0.0		
9.4 NAIC 4.....	XXX	XXX	XXX	XXX	XXX		0	0.0		0.0		
9.5 NAIC 5.....	XXX	XXX	XXX	XXX	XXX		0	0.0		0.0		
9.6 NAIC 6.....	XXX	XXX	XXX	XXX	XXX		0	0.0		0.0		
9.7 Totals.....	XXX	XXX	XXX	XXX	XXX		0	0.0	0	0.0	0	0
<b>10. Unaffiliated Bank Loans</b>												
10.1 NAIC 1.....						XXX.....	0	0.0		0.0		
10.2 NAIC 2.....						XXX.....	0	0.0		0.0		
10.3 NAIC 3.....						XXX.....	0	0.0		0.0		
10.4 NAIC 4.....						XXX.....	0	0.0		0.0		
10.5 NAIC 5.....						XXX.....	0	0.0		0.0		
10.6 NAIC 6.....						XXX.....	0	0.0		0.0		
10.7 Totals.....	0	0	0	0	0	XXX.....	0	0.0	0	0.0	0	0

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**NONE**

### SCHEDULE D - PART 1A - SECTION 1 (continued)

Quality and Maturity Distribution of All Bonds Owned December 31, At Book/Adjusted Carrying Values By Major Types of Issues and NAIC Designations

NAIC Designation	1 1 Year or Less	2 Over 1 Year Through 5 Years	3 Over 5 Years Through 10 Years	4 Over 10 Years Through 20 Years	5 Over 20 Years	6 No Maturity Date	7 Total Current Year	8 Column 7 as a % of Line 11.7	9 Total from Column 7 Prior Year	10 % from Col. 8 Prior Year	11 Total Publicly Traded	12 Total Privately Placed (a)
<b>11. Total Bonds Current Year</b>												
11.1 NAIC 1.....	(d).....295,099	.....0	.....0	.....0	.....0	.....0	.....295,099	.....100.0	.....XXX	.....XXX	.....0	.....295,099
11.2 NAIC 2.....	(d).....0	.....0	.....0	.....0	.....0	.....0	.....0	.....0.0	.....XXX	.....XXX	.....0	.....0
11.3 NAIC 3.....	(d).....0	.....0	.....0	.....0	.....0	.....0	.....0	.....0.0	.....XXX	.....XXX	.....0	.....0
11.4 NAIC 4.....	(d).....0	.....0	.....0	.....0	.....0	.....0	.....0	.....0.0	.....XXX	.....XXX	.....0	.....0
11.5 NAIC 5.....	(d).....0	.....0	.....0	.....0	.....0	.....0	.....0	.....0.0	.....XXX	.....XXX	.....0	.....0
11.6 NAIC 6.....	(d).....0	.....0	.....0	.....0	.....0	.....0	(c).....0	.....0.0	.....XXX	.....XXX	.....0	.....0
11.7 Totals.....	.....295,099	.....0	.....0	.....0	.....0	.....0	(b).....295,099	.....100.0	.....XXX	.....XXX	.....0	.....295,099
11.8 Line 11.7 as a % of Col. 7.....	.....100.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....100.0	.....XXX	.....XXX	.....XXX	.....0.0	.....100.0
<b>12. Total Bonds Prior Year</b>												
12.1 NAIC 1.....							.....XXX	.....XXX	.....0	.....0.0		
12.2 NAIC 2.....							.....XXX	.....XXX	.....0	.....0.0		
12.3 NAIC 3.....							.....XXX	.....XXX	.....0	.....0.0		
12.4 NAIC 4.....							.....XXX	.....XXX	.....0	.....0.0		
12.5 NAIC 5.....							.....XXX	.....XXX	(c).....0	.....0.0		
12.6 NAIC 6.....							.....XXX	.....XXX	(c).....0	.....0.0		
12.7 Totals.....	.....0	.....0	.....0	.....0	.....0	.....0	.....XXX	.....XXX	(b).....0	.....0.0	.....0	.....0
12.8 Line 12.7 as a % of Col. 9.....	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....XXX	.....XXX	.....0.0	.....XXX	.....0.0	.....0.0
<b>13. Total Publicly Traded Bonds</b>												
13.1 NAIC 1.....							.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.2 NAIC 2.....							.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.3 NAIC 3.....							.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.4 NAIC 4.....							.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.5 NAIC 5.....							.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.6 NAIC 6.....							.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.7 Totals.....	.....0	.....0	.....0	.....0	.....0	.....0	.....0	.....0.0	.....0	.....0.0	.....0	.....XXX
13.8 Line 13.7 as a % of Col. 7.....	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....XXX	.....XXX	.....XXX	.....0.0	.....XXX
13.9 Line 13.7 as a % of Line 11.7, Col. 7, Section 11.....	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....XXX	.....XXX	.....XXX	.....0.0	.....XXX
<b>14. Total Privately Placed Bonds</b>												
14.1 NAIC 1.....	.....295,099						.....295,099	.....100.0	.....0	.....0.0	.....XXX	.....295,099
14.2 NAIC 2.....							.....0	.....0.0	.....0	.....0.0	.....XXX	.....0
14.3 NAIC 3.....							.....0	.....0.0	.....0	.....0.0	.....XXX	.....0
14.4 NAIC 4.....							.....0	.....0.0	.....0	.....0.0	.....XXX	.....0
14.5 NAIC 5.....							.....0	.....0.0	.....0	.....0.0	.....XXX	.....0
14.6 NAIC 6.....							.....0	.....0.0	.....0	.....0.0	.....XXX	.....0
14.7 Totals.....	.....295,099	.....0	.....0	.....0	.....0	.....0	.....295,099	.....100.0	.....0	.....0.0	.....XXX	.....295,099
14.8 Line 14.7 as a % of Col. 7.....	.....100.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....100.0	.....XXX	.....XXX	.....XXX	.....XXX	.....100.0
14.9 Line 14.7 as a % of Line 11.7, Col. 7, Section 11.....	.....100.0	.....0.0	.....0.0	.....0.0	.....0.0	.....0.0	.....100.0	.....XXX	.....XXX	.....XXX	.....XXX	.....100.0

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(a) Includes \$.....0 freely tradable under SEC Rule 144 or qualified for resale under SEC Rule 144A.  
 (b) Includes \$.....0 current year of bonds with Z designations and \$.....0 prior year of bonds with Z designations. The letter "Z" means the NAIC designation was not assigned by the Securities Valuation Office (SVO) at the date of the statement.  
 (c) Includes \$.....0 current year of bonds with 5GI designations, \$.....0 prior year of bonds with 5GI designations and \$.....0 current year, \$.....0 prior year of bonds with 6\* designations. "5GI" means the NAIC designation was assigned by the SVO in reliance on the insurer's certification that the issuer is current in all principal and interest payments. "6\*" means the NAIC designation was assigned by the SVO due to inadequate certification of principal and interest payments.  
 (d) Includes the following amount of short-term and cash equivalent bonds by NAIC designation: NAIC 1 \$.....295,099; NAIC 2 \$.....0; NAIC 3 \$.....0; NAIC 4 \$.....0; NAIC 5 \$.....0; NAIC 6 \$.....0.

## SCHEDULE D - PART 1A - SECTION 2

Maturity Distribution of All Bonds Owned December 31, At Book/Adjusted Carrying Values By Major Type and Subtype of Issues

Distribution by Type	1 1 Year or Less	2 Over 1 Year Through 5 Years	3 Over 5 Years Through 10 Years	4 Over 10 Years Through 20 Years	5 Over 20 Years	6 No Maturity Date	7 Total Current Year	8 Column 7 as a % of Line 11.08	9 Total from Column 7 Prior Year	10 % from Col. 8 Prior Year	11 Total Publicly Traded	12 Total Privately Placed
<b>1. U.S. Governments</b>												
1.01 Issuer Obligations.....	295,099					.XXX	295,099	100.0		0.0		295,099
1.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
1.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
1.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
1.05 Totals.....	295,099	0	0	0	0	.XXX	295,099	100.0	0	0.0	0	295,099
<b>2. All Other Governments</b>												
2.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
2.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
2.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
2.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
2.05 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0
<b>3. U.S. States, Territories and Possessions, Guaranteed</b>												
3.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
3.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
3.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
3.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
3.05 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0
<b>4. U.S. Political Subdivisions of States, Territories and Possessions, Guaranteed</b>												
4.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
4.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
4.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
4.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
4.05 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0
<b>5. U.S. Special Revenue &amp; Special Assessment Obligations, etc., Non-Guaranteed</b>												
5.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
5.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
5.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
5.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
5.05 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0
<b>6. Industrial and Miscellaneous (unaffiliated)</b>												
6.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
6.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
6.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
6.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
6.05 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0
<b>7. Hybrid Securities</b>												
7.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
7.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
7.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
7.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
7.05 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0
<b>8. Parent, Subsidiaries and Affiliates</b>												
8.01 Issuer Obligations.....						.XXX	0	0.0		0.0		
8.02 Residential Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
8.03 Commercial Mortgage-Backed Securities.....						.XXX	0	0.0		0.0		
8.04 Other Loan-Backed and Structured Securities.....						.XXX	0	0.0		0.0		
8.05 Affiliated Bank Loans - Issued.....						.XXX	0	0.0		0.0		
8.06 Affiliated Bank Loans - Acquired.....						.XXX	0	0.0		0.0		
8.07 Totals.....	0	0	0	0	0	.XXX	0	0.0	0	0.0	0	0

SIOIS

## SCHEDULE D - PART 1A - SECTION 2 (continued)

Maturity Distribution of All Bonds Owned December 31, At Book/Adjusted Carrying Values By Major Type and Subtype of Issues

	1 1 Year or Less	2 Over 1 Year Through 5 Years	3 Over 5 Years Through 10 Years	4 Over 10 Years Through 20 Years	5 Over 20 Years	6 No Maturity Date	7 Total Current Year	8 Column 7 as a % of Line 11.08	9 Total from Column 7 Prior Year	10 % from Col. 8 Prior Year	11 Total Publicly Traded	12 Total Privately Placed
Distribution by Type												
<b>9. SVO Identified Funds</b>												
9.01 Exchange Traded Funds Identified by the SVO.....	XXX	XXX	XXX	XXX	XXX		.0	.00		.00		
9.02 Bond Mutual Funds Identified by the SVO.....	XXX	XXX	XXX	XXX	XXX		.0	.00		.00		
9.03 Totals.....	XXX	XXX	XXX	XXX	XXX	.0	.0	.00	.0	.00	.0	.0
<b>10. Unaffiliated Bank Loans</b>												
10.01 Unaffiliated Bank Loans - Issued.....						XXX	.0	.00		.00		
10.02 Unaffiliated Bank Loans - Acquired.....						XXX	.0	.00		.00		
10.03 Totals.....	.0	.0	.0	.0	.0	XXX	.0	.00	.0	.00	.0	.0
<b>11. Total Bonds Current Year</b>												
11.01 Issuer Obligations.....	295,099	.0	.0	.0	.0	XXX	295,099	100.0	XXX	XXX	.0	295,099
11.02 Residential Mortgage-Backed Securities.....	.0	.0	.0	.0	.0	XXX	.0	.00	XXX	XXX	.0	.0
11.03 Commercial Mortgage-Backed Securities.....	.0	.0	.0	.0	.0	XXX	.0	.00	XXX	XXX	.0	.0
11.04 Other Loan-Backed and Structured Securities.....	.0	.0	.0	.0	.0	XXX	.0	.00	XXX	XXX	.0	.0
11.05 SVO Identified Funds.....	XXX	XXX	XXX	XXX	XXX	.0	.0	.00	XXX	XXX	.0	.0
11.06 Affiliated Bank Loans.....	.0	.0	.0	.0	.0	XXX	.0	.00	XXX	XXX	.0	.0
11.07 Unaffiliated Bank Loans.....	.0	.0	.0	.0	.0	XXX	.0	.00	XXX	XXX	.0	.0
11.08 Totals.....	295,099	.0	.0	.0	.0	.0	295,099	100.0	XXX	XXX	.0	295,099
11.09 Line 11.08 as a % of Col. 7.....	100.0	.00	.00	.00	.00	.00	100.0	XXX	XXX	XXX	.00	100.0
<b>12. Total Bonds Prior Year</b>												
12.01 Issuer Obligations.....						XXX	XXX	XXX	.0	.00		
12.02 Residential Mortgage-Backed Securities.....						XXX	XXX	XXX	.0	.00		
12.03 Commercial Mortgage-Backed Securities.....						XXX	XXX	XXX	.0	.00		
12.04 Other Loan-Backed and Structured Securities.....						XXX	XXX	XXX	.0	.00		
12.05 SVO Identified Funds.....	XXX	XXX	XXX	XXX	XXX	.0	.0	.00	XXX	XXX	.0	.0
12.06 Affiliated Bank Loans.....						XXX	XXX	XXX	.0	.00		
12.07 Unaffiliated Bank Loans.....						XXX	XXX	XXX	.0	.00		
12.08 Totals.....	.0	.0	.0	.0	.0	.0	XXX	XXX	.0	100.0	.0	.0
12.09 Line 12.08 as a % of Col. 9.....	.00	.00	.00	.00	.00	.00	XXX	XXX	.00	XXX	.00	.00
<b>13. Total Publicly Traded Bonds</b>												
13.01 Issuer Obligations.....						XXX	.0	.00	.0	.00	.0	XXX
13.02 Residential Mortgage-Backed Securities.....						XXX	.0	.00	.0	.00	.0	XXX
13.03 Commercial Mortgage-Backed Securities.....						XXX	.0	.00	.0	.00	.0	XXX
13.04 Other Loan-Backed and Structured Securities.....						XXX	.0	.00	.0	.00	.0	XXX
13.05 SVO Identified Funds.....	XXX	XXX	XXX	XXX	XXX	.0	.0	.00	.0	.00	.0	XXX
13.06 Affiliated Bank Loans.....						XXX	.0	.00	.0	.00	.0	XXX
13.07 Unaffiliated Bank Loans.....						XXX	.0	.00	.0	.00	.0	XXX
13.08 Totals.....	.0	.0	.0	.0	.0	.0	.0	.00	.0	.00	.0	XXX
13.09 Line 13.08 as a % of Col. 7.....	.00	.00	.00	.00	.00	.00	.00	XXX	XXX	XXX	.00	XXX
13.10 Line 13.08 as a % of Line 11.08, Col. 7, Section 11.....	.00	.00	.00	.00	.00	.00	.00	XXX	XXX	XXX	.00	XXX
<b>14. Total Privately Placed Bonds</b>												
14.01 Issuer Obligations.....	295,099					XXX	295,099	100.0	.0	.00	XXX	295,099
14.02 Residential Mortgage-Backed Securities.....						XXX	.0	.00	.0	.00	XXX	.0
14.03 Commercial Mortgage-Backed Securities.....						XXX	.0	.00	.0	.00	XXX	.0
14.04 Other Loan-Backed and Structured Securities.....						XXX	.0	.00	.0	.00	XXX	.0
14.05 SVO Identified Funds.....	XXX	XXX	XXX	XXX	XXX	.0	.0	.00	.0	.00	XXX	.0
14.06 Affiliated Bank Loans.....						XXX	.0	.00	.0	.00	XXX	.0
14.07 Unaffiliated Bank Loans.....						XXX	.0	.00	.0	.00	XXX	.0
14.08 Totals.....	295,099	.0	.0	.0	.0	.0	295,099	100.0	.0	.00	XXX	295,099
14.09 Line 14.08 as a % of Col. 7.....	100.0	.00	.00	.00	.00	.00	100.0	XXX	XXX	XXX	.00	XXX
14.10 Line 14.08 as a % of Line 11.08, Col. 7, Section 11.....	100.0	.00	.00	.00	.00	.00	100.0	XXX	XXX	XXX	.00	XXX

601S



**Sch. DA - Verification  
NONE**

**Sch. DB - Pt. A - Verification  
NONE**

**Sch. DB - Pt. B - Verification  
NONE**

**Sch. DB - Pt. C - Sn. 1  
NONE**

**Sch. DB - Pt. C - Sn. 2  
NONE**

**Sch. DB - Verification  
NONE**

## SCHEDULE E - PART 2 - VERIFICATION BETWEEN YEARS

### Cash Equivalents

	1 Total	2 Bonds	3 Money Market Mutual Funds	4 Other (a)
1. Book/adjusted carrying value, December 31 of prior year.....	0			
2. Cost of cash equivalents acquired.....	295,099	295,099		
3. Accrual of discount.....	0			
4. Unrealized valuation increase (decrease).....	0			
5. Total gain (loss) on disposals.....	0			
6. Deduct consideration received on disposals.....	0			
7. Deduct amortization of premium.....	0			
8. Total foreign exchange change in book/adjusted carrying value.....	0			
9. Deduct current year's other-than-temporary impairment recognized.....	0			
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	295,099	295,099	0	0
11. Deduct total nonadmitted amounts.....	0			
12. Statement value at end of current period (Line 10 minus Line 11).....	295,099	295,099	0	0

S15

(a) Indicate the category of such investments, for example, joint ventures, transportation equipment.....

**Sch. A - Pt. 1  
NONE**

**Sch. A - Pt. 2  
NONE**

**Sch. A - Pt. 3  
NONE**

**Sch. B - Pt. 1  
NONE**

**Sch. B - Pt. 2  
NONE**

**Sch. B - Pt. 3  
NONE**

**Sch. BA - Pt. 1  
NONE**

**Sch. BA - Pt. 2  
NONE**

**Sch. BA - Pt. 3  
NONE**

**Sch. D - Pt. 1  
NONE**

**Sch. D - Pt. 2 - Sn. 1  
NONE**

**Sch. D - Pt. 2 - Sn. 2  
NONE**

**Sch. D - Pt. 3  
NONE**

**Sch. D - Pt. 4  
NONE**

**Sch. D - Pt. 5  
NONE**

**Sch. D - Pt. 6 - Sn. 1  
NONE**

**Sch. D - Pt. 6 - Sn. 2  
NONE**

**Sch. DA - Pt. 1  
NONE**

**Sch. DB - Pt. A - Sn. 1  
NONE**

**Sch. DB - Pt. A - Sn. 2  
NONE**

**Sch. DB - Pt. B - Sn. 1**  
**NONE**

**Sch. DB - Pt. B - Sn. 2**  
**NONE**

**Sch. DB - Pt. D - Sn. 1**  
**NONE**

**Sch. DB - Pt. D - Sn. 2**  
**NONE**

**Sch. DB - Pt. E**  
**NONE**

**Sch. DL - Pt. 1**  
**NONE**

**Sch. DL - Pt. 2**  
**NONE**

**SCHEDULE E - PART 1 - CASH**

1	2	3	4	5	6	7
Depository	Code	Rate of Interest	Amount of Interest Received During Year	Amount of Interest Accrued December 31 of Current Year	Balance	*
<b>Open Depositories</b>						
Bank of Oklahoma..... Tulsa, OK.....					4,719,741	XXX
0199999. Total - Open Depositories.....	XXX	XXX	0	0	4,719,741	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	0	0	4,719,741	XXX
0599999. Total Cash.....	XXX	XXX	0	0	4,719,741	XXX

TOTALS OF DEPOSITORY BALANCES ON THE LAST DAY OF EACH MONTH DURING THE CURRENT YEAR

1. January.....	4. April.....	7. July.....	10. October.....	4,710,977
2. February.....	5. May.....	8. August.....	11. November.....	4,715,270
3. March.....	6. June.....	9. September.....	12. December.....	4,719,741
				4,706,973

## SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned December 31 of Current Year

1 CUSIP	2 Description	3 Code	4 Date Acquired	5 Rate of Interest	6 Maturity Date	7 Book/Adjusted Carrying Value	8 Amount of Interest Due & Accrued	9 Amount Received During Year
<b>U.S. Government Bonds - Issuer Obligations</b>								
	Treasury Bill.....		08/23/2019.....		08/13/2020.....	295,099	0	0
0199999	U.S. Government Bonds - Issuer Obligations.....					295,099	0	0
0599999	Total - U.S. Government Bonds.....					295,099	0	0
<b>Total Bonds</b>								
7699999	Subtotals - Issuer Obligations.....					295,099	0	0
8399999	Subtotals - Bonds.....					295,099	0	0
8899999	Total - Cash Equivalents.....					295,099	0	0

**SCHEDULE E - PART 3 - SPECIAL DEPOSITS**

States, Etc.	1 Type of Deposit	2 Purpose of Deposit	Deposits for the Benefit of All Policyholders		All Other Special Deposits	
			3 Book/Adjusting Carrying Value	4 Fair Value	5 Book/Adjusting Carrying Value	6 Fair Value
1. Alabama.....AL						
2. Alaska.....AK						
3. Arizona.....AZ						
4. Arkansas.....AR						
5. California.....CA						
6. Colorado.....CO						
7. Connecticut.....CT						
8. Delaware.....DE						
9. District of Columbia.....DC						
10. Florida.....FL						
11. Georgia.....GA						
12. Hawaii.....HI						
13. Idaho.....ID						
14. Illinois.....IL						
15. Indiana.....IN						
16. Iowa.....IA						
17. Kansas.....KS						
18. Kentucky.....KY						
19. Louisiana.....LA						
20. Maine.....ME						
21. Maryland.....MD						
22. Massachusetts.....MA						
23. Michigan.....MI						
24. Minnesota.....MN						
25. Mississippi.....MS						
26. Missouri.....MO						
27. Montana.....MT						
28. Nebraska.....NE						
29. Nevada.....NV						
30. New Hampshire.....NH						
31. New Jersey.....NJ						
32. New Mexico.....NM						
33. New York.....NY						
34. North Carolina.....NC						
35. North Dakota.....ND						
36. Ohio.....OH						
37. Oklahoma.....OK	ST.	For security of policyholders of the state.....	295,099	297,149		
38. Oregon.....OR						
39. Pennsylvania.....PA						
40. Rhode Island.....RI						
41. South Carolina.....SC						
42. South Dakota.....SD						
43. Tennessee.....TN						
44. Texas.....TX						
45. Utah.....UT						
46. Vermont.....VT						
47. Virginia.....VA						
48. Washington.....WA						
49. West Virginia.....WV						
50. Wisconsin.....WI						
51. Wyoming.....WY						
52. American Samoa.....AS						
53. Guam.....GU						
54. Puerto Rico.....PR						
55. US Virgin Islands.....VI						
56. Northern Mariana Islands.....MP						
57. Canada.....CAN						
58. Aggregate Alien and Other.....OT	XXX	XXX	0	0	0	0
59. Total.....	XXX	XXX	295,099	297,149	0	0

**DETAILS OF WRITE-INS**

5801. ....						
5802. ....						
5803. ....						
5898. Summary of remaining write-ins for line 58 from overflow page.....	XXX	XXX	0	0	0	0
5899. Total (Lines 5801 thru 5803+5898) (Line 58 above).....	XXX	XXX	0	0	0	0

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