

ANNUAL STATEMENT

OF THE

GENERAL INSURANCE COMPANY OF AMERICA

of SEATTLE

in the state of WASHINGTON

TO THE

Insurance Department

OF THE

FOR THE YEAR ENDED

December 31, 2010

PROPERTY AND CASUALTY

2010



ANNUAL STATEMENT

For the Year Ended December 31, 2010
OF THE CONDITION AND AFFAIRS OF THE

General Insurance Company of America

NAIC Group Code 0111 0111 **NAIC Company Code** 24732 **Employer's ID Number** 91-0231910
(Current Period) (Prior Period)

Organized under the Laws of Washington, **State of Domicile or Port of Entry** Washington
Country of Domicile United States of America

Incorporated/Organized: March 20, 1923 **Commenced Business** May 1, 1923

Statutory Home Office 1001 Fourth Avenue, Safeco Plaza, Seattle, WA 98154
(Street and Number) (City or Town, State and Zip Code)

Main Administrative Office: 1001 Fourth Avenue, Safeco Plaza
(Street and Number)
Seattle, WA 98154 206-545-5000
(City or Town, State and Zip Code) (Area Code) (Telephone Number)

Mail Address: 175 Berkeley Street, Boston, MA 02116
(Street and Number or P.O. Box) (City or Town, State and Zip Code)

Primary Location of Books and Records: 175 Berkeley Street Boston, MA 02116 617-357-9500
(Street and Number) (City or Town, State and Zip Code) (Area Code) (Telephone Number)

Internet Web Site Address WWW.SAFECO.COM

Statutory Statement Contact: Pamela Heenan 617-357-9500 x44689
(Name) (Area Code) (Telephone Number) (Extension)
Statutory.Compliance@LibertyMutual.com 617-574-5955
(E-Mail Address) (Fax Number)

OFFICERS

Chairman of the Board

Gary Richard Gregg

| | Name | Title |
|----|-----------------------|---------------------------------------|
| 1. | Gary Richard Gregg | President and Chief Executive Officer |
| 2. | Dexter Robert Legg | Secretary |
| 3. | Michael Joseph Fallon | Treasurer and Chief Financial Officer |

VICE-PRESIDENTS

| Name | Title | Name | Title |
|----------------------------|----------------------------------|-----------------------|--------------------------|
| Anthony Alexander Fontanes | EVP and Chief Investment Officer | Joseph Anthony Gilles | Executive Vice President |
| Scott Rhodes Goodby | EVP and Chief Operating Officer | | |
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DIRECTORS OR TRUSTEES

| | | | |
|--------------------|-------------------------------|-----------------------|---------------------|
| John Derek Doyle | Michael Joseph Fallon | Joseph Anthony Gilles | Scott Rhodes Goodby |
| Gary Richard Gregg | Christopher Charles Mansfield | | |
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State of Massachusetts

County of Suffolk ss

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) Gary Richard Gregg | (Signature) Dexter Robert Legg | (Signature) Michael Joseph Fallon |
| (Printed Name) 1. President and Chief Executive Officer | (Printed Name) 2. Secretary | (Printed Name) 3. Treasurer and Chief Financial Officer |
| (Title) | (Title) | (Title) |

Subscribed and sworn to (or affirmed) before me on this
31st day of January, 2011, by

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

ASSETS

| | Current Year | | | Prior Year |
|---|---------------|--------------------|-----------------------------------|---------------------|
| | 1 | 2 | 3 | 4 |
| | Assets | Nonadmitted Assets | Net Admitted Assets (Cols. 1 - 2) | Net Admitted Assets |
| 1. Bonds (Schedule D) | 1,499,461,479 | | 1,499,461,479 | 1,701,440,016 |
| 2. Stocks (Schedule D): | | | | |
| 2.1 Preferred stocks | 13,754,650 | | 13,754,650 | 17,970,230 |
| 2.2 Common stocks | 60,008,492 | | 60,008,492 | 18,354,661 |
| 3. Mortgage loans on real estate (Schedule B): | | | | |
| 3.1 First liens | 39,652,419 | | 39,652,419 | 15,660,130 |
| 3.2 Other than first liens | | | | |
| 4. Real estate (Schedule A): | | | | |
| 4.1 Properties occupied by the company (less \$ 0 encumbrances) | | | | |
| 4.2 Properties held for the production of income (less \$ 0 encumbrances) | | | | |
| 4.3 Properties held for sale (less \$ 0 encumbrances) | | | | |
| 5. Cash (\$ 228,221, Schedule E - Part 1), cash equivalents (\$ 22,087,918, Schedule E - Part 2), and short-term investments (\$ 18,108,887, Schedule DA) | 40,425,026 | | 40,425,026 | 103,959,856 |
| 6. Contract loans (including \$ 0 premium notes) | | | | |
| 7. Derivatives | | | | |
| 8. Other invested assets (Schedule BA) | 126,866 | | 126,866 | |
| 9. Receivables for securities | 246,227 | | 246,227 | |
| 10. Securities lending reinvested collateral assets | 9,727,485 | | 9,727,485 | |
| 11. Aggregate write-ins for invested assets | | | | |
| 12. Subtotals, cash and invested assets (Lines 1 to 11) | 1,663,402,644 | | 1,663,402,644 | 1,857,384,893 |
| 13. Title plants less \$ 0 charged off (for Title insurers only) | | | | |
| 14. Investment income due and accrued | 17,610,975 | | 17,610,975 | 21,505,060 |
| 15. Premiums and considerations: | | | | |
| 15.1 Uncollected premiums and agents' balances in the course of collection | 37,010,273 | 3,984,304 | 33,025,969 | 36,449,767 |
| 15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ (2,310,966) earned but unbilled premiums) | 265,618,170 | 6,160 | 265,612,010 | 258,811,213 |
| 15.3 Accrued retrospective premiums | 936,294 | 93,495 | 842,799 | 1,502,332 |
| 16. Reinsurance: | | | | |
| 16.1 Amounts recoverable from reinsurers | 16,752,137 | | 16,752,137 | 18,609,125 |
| 16.2 Funds held by or deposited with reinsured companies | | | | |
| 16.3 Other amounts receivable under reinsurance contracts | | | | |
| 17. Amounts receivable relating to uninsured plans | | | | |
| 18.1 Current federal and foreign income tax recoverable and interest thereon | 19,455,370 | | 19,455,370 | |
| 18.2 Net deferred tax asset | 67,517,000 | 14,986,308 | 52,530,692 | 55,434,700 |
| 19. Guaranty funds receivable or on deposit | 1,554,508 | | 1,554,508 | 1,703,263 |
| 20. Electronic data processing equipment and software | | | | |
| 21. Furniture and equipment, including health care delivery assets (\$ 0) | | | | |
| 22. Net adjustment in assets and liabilities due to foreign exchange rates | | | | |
| 23. Receivables from parent, subsidiaries and affiliates | 767,562 | | 767,562 | 1,089,450 |
| 24. Health care (\$ 0) and other amounts receivable | | | | |
| 25. Aggregate write-ins for other than invested assets | 9,304,649 | 1,244,073 | 8,060,576 | 7,742,064 |
| 26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25) | 2,099,929,582 | 20,314,340 | 2,079,615,242 | 2,260,231,867 |
| 27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts | | | | |
| 28. Total (Lines 26 and 27) | 2,099,929,582 | 20,314,340 | 2,079,615,242 | 2,260,231,867 |

| DETAILS OF WRITE-IN LINES | | | | |
|---|-----------|-----------|-----------|-----------|
| 1101. | | | | |
| 1102. | | | | |
| 1103. | | | | |
| 1198. Summary of remaining write-ins for Line 11 from overflow page | | | | |
| 1199. Totals (Lines 1101 through 1103 plus 1198) (Line 11 above) | | | | |
| 2501. Cash Surrender Value Life Insurance | 5,348,219 | | 5,348,219 | 5,213,506 |
| 2502. Equities and deposits in pools and associations | 2,433,673 | | 2,433,673 | 2,183,993 |
| 2503. Other assets | 1,522,757 | 1,244,073 | 278,684 | 344,565 |
| 2598. Summary of remaining write-ins for Line 25 from overflow page | | | | |
| 2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above) | 9,304,649 | 1,244,073 | 8,060,576 | 7,742,064 |

LIABILITIES, SURPLUS AND OTHER FUNDS

| | 1 | 2 |
|---|---------------|---------------|
| | Current Year | Prior Year |
| 1. Losses (Part 2A, Line 35, Column 8) | 821,610,206 | 864,827,432 |
| 2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6) | 55,127,920 | 55,754,833 |
| 3. Loss adjustment expenses (Part 2A, Line 35, Column 9) | 183,372,265 | 205,900,191 |
| 4. Commissions payable, contingent commissions and other similar charges | 24,815,752 | 24,506,544 |
| 5. Other expenses (excluding taxes, licenses and fees) | 7,262,867 | 29,092,699 |
| 6. Taxes, licenses and fees (excluding federal and foreign income taxes) | 8,299,059 | 8,819,167 |
| 7.1 Current federal and foreign income taxes (including \$ 0 on realized capital gains (losses)) | | 2,828,451 |
| 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 \$ 122,819,427 and including warranty reserves of \$ 0) | 446,490,508 | 423,304,339 |
| 10. Advance premium | 3,026,169 | 3,013,114 |
| 11. Dividends declared and unpaid: | | |
| 11.1 Stockholders | | |
| 11.2 Policyholders | 86,237 | 781,078 |
| 12. Ceded reinsurance premiums payable (net of ceding commissions) | 17,395,573 | 1,083,978 |
| 13. Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 19) | | |
| 14. Amounts withheld or retained by company for account of others | 615,711 | (278,975) |
| 15. Remittances and items not allocated | | |
| 16. Provision for reinsurance (Schedule F, Part 7) | | |
| 17. Net adjustments in assets and liabilities due to foreign exchange rates | | |
| 18. Drafts outstanding | 30,114,197 | 30,230,522 |
| 19. Payable to parent, subsidiaries and affiliates | 27,436,521 | 1,527,699 |
| 20. Derivatives | | |
| 21. Payable for securities | 18,864,751 | 15,427,684 |
| 22. Payable for securities lending | 9,727,485 | |
| 23. Liability for amounts held under uninsured plans | | |
| 24. Capital notes \$ 0 and interest thereon \$ 0 | | |
| 25. Aggregate write-ins for liabilities | 15,758,874 | 45,415,026 |
| 26. Total liabilities excluding protected cell liabilities (Lines 1 through 25) | 1,670,004,095 | 1,712,233,782 |
| 27. Protected cell liabilities | | |
| 28. Total liabilities (Lines 26 and 27) | 1,670,004,095 | 1,712,233,782 |
| 29. Aggregate write-ins for special surplus funds | 11,663,352 | 10,466,785 |
| 30. Common capital stock | 5,000,000 | 5,000,000 |
| 31. Preferred capital stock | | |
| 32. Aggregate write-ins for other than special surplus funds | | |
| 33. Surplus notes | | |
| 34. Gross paid in and contributed surplus | 170,891,058 | 170,891,058 |
| 35. Unassigned funds (surplus) | 222,056,737 | 361,640,242 |
| 36. Less treasury stock, at cost: | | |
| 36.1 0 shares common (value included in Line 30 \$ 0) | | |
| 36.2 0 shares preferred (value included in Line 31 \$ 0) | | |
| 37. Surplus as regards policyholders (Lines 29 to 35, less 36) (Page 4, Line 39) | 409,611,147 | 547,998,085 |
| 38. Totals (Page 2, Line 28, Col. 3) | 2,079,615,242 | 2,260,231,867 |

| DETAILS OF WRITE-IN LINES | | |
|---|------------|------------|
| 2501. Retroactive reinsurance reserves | 8,776,896 | 8,286,299 |
| 2502. Other liabilities | 4,773,501 | 6,923,603 |
| 2503. Accrued return retrospective premiums | 1,120,025 | 1,141,342 |
| 2598. Summary of remaining write-ins for Line 25 from overflow page | 1,088,452 | 29,063,782 |
| 2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above) | 15,758,874 | 45,415,026 |
| 2901. SSAP 10R incremental change | 9,673,485 | 8,632,671 |
| 2902. Special surplus from retroactive reinsurance | 1,989,867 | 1,834,114 |
| 2903. | | |
| 2998. Summary of remaining write-ins for Line 29 from overflow page | | |
| 2999. Totals (Lines 2901 through 2903 plus 2998) (Line 29 above) | 11,663,352 | 10,466,785 |
| 3201. | | |
| 3202. | | |
| 3203. | | |
| 3298. Summary of remaining write-ins for Line 32 from overflow page | | |
| 3299. Totals (Lines 3201 through 3203 plus 3298) (Line 32 above) | | |

STATEMENT OF INCOME

| | 1 | 2 |
|---|---------------|-------------|
| | Current Year | Prior Year |
| UNDERWRITING INCOME | | |
| 1. Premiums earned (Part 1, Line 35, Column 4) | 948,904,559 | 963,840,745 |
| DEDUCTIONS: | | |
| 2. Losses incurred (Part 2, Line 35, Column 7) | 531,680,660 | 488,813,155 |
| 3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1) | 112,019,397 | 114,436,853 |
| 4. Other underwriting expenses incurred (Part 3, Line 25, Column 2) | 318,892,463 | 319,960,654 |
| 5. Aggregate write-ins for underwriting deductions | (51,907) | 150,367 |
| 6. Total underwriting deductions (Lines 2 through 5) | 962,540,613 | 923,361,029 |
| 7. Net income of protected cells | | |
| 8. Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7) | (13,636,054) | 40,479,716 |
| INVESTMENT INCOME | | |
| 9. Net investment income earned (Exhibit of Net Investment Income, Line 17) | 74,401,483 | 84,664,667 |
| 10. Net realized capital gains (losses) less capital gains tax of \$ 4,742,039 (Exhibit of Capital Gains (Losses)) | 8,806,644 | (4,187,821) |
| 11. Net investment gain (loss) (Lines 9 + 10) | 83,208,127 | 80,476,846 |
| OTHER INCOME | | |
| 12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$ 55,372 amount charged off \$ 4,042,554) | (3,987,182) | (4,266,410) |
| 13. Finance and service charges not included in premiums | 8,373,206 | 8,217,447 |
| 14. Aggregate write-ins for miscellaneous income | (11,890,182) | (5,576,898) |
| 15. Total other income (Lines 12 through 14) | (7,504,158) | (1,625,861) |
| 16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15) | 62,067,915 | 119,330,701 |
| 17. Dividends to policyholders | (324,233) | 4,123,899 |
| 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) | 62,392,148 | 115,206,802 |
| 19. Federal and foreign income taxes incurred | (2,905,339) | 27,483,031 |
| 20. Net income (Line 18 minus Line 19) (to Line 22) | 65,297,487 | 87,723,771 |
| CAPITAL AND SURPLUS ACCOUNT | | |
| 21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2) | 547,998,085 | 447,618,803 |
| 22. Net income (from Line 20) | 65,297,487 | 87,723,771 |
| 23. Net transfers (to) from Protected Cell accounts | | |
| 24. Change in net unrealized capital gains or (losses) less capital gains tax of \$ 943,472 | 2,055,218 | 5,665,895 |
| 25. Change in net unrealized foreign exchange capital gain (loss) | | |
| 26. Change in net deferred income tax | (12,683,528) | 530,527 |
| 27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 26, Col. 3) | 12,462,454 | (2,837,049) |
| 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 | | |
| 33.2 Transferred to capital (Stock Dividend) | | |
| 33.3 Transferred from capital | | |
| 34. Net remittances from or (to) Home Office | | |
| 35. Dividends to stockholders | (206,000,000) | |
| 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 | 481,431 | 9,296,138 |
| 38. Change in surplus as regards policyholders for the year (Lines 22 through 37) | (138,386,938) | 100,379,282 |
| 39. Surplus as regards policyholders, as of December 31 current year (Lines 21 plus Line 38) (Page 3, Line 37) | 409,611,147 | 547,998,085 |

| DETAILS OF WRITE-IN LINES | | |
|---|--------------|-------------|
| 0501. Private passenger auto escrow | (51,907) | 150,367 |
| 0502. | | |
| 0503. | | |
| 0598. Summary of remaining write-ins for Line 05 from overflow page | | |
| 0599. Totals (Lines 0501 through 0503 plus 0598) (Line 05 above) | (51,907) | 150,367 |
| 1401. Other income/(expense) | (139,227) | (5,452,635) |
| 1402. Retroactive reinsurance gain/(loss) | (11,750,955) | (124,263) |
| 1403. | | |
| 1498. Summary of remaining write-ins for Line 14 from overflow page | | |
| 1499. Totals (Lines 1401 through 1403 plus 1498) (Line 14 above) | (11,890,182) | (5,576,898) |
| 3701. SSAP 10R incremental change | 1,040,814 | 8,632,671 |
| 3702. Other changes in surplus | (559,383) | 663,467 |
| 3703. | | |
| 3798. Summary of remaining write-ins for Line 37 from overflow page | | |
| 3799. Totals (Lines 3701 through 3703 plus 3798) (Line 37 above) | 481,431 | 9,296,138 |

CASH FLOW

| Cash from Operations | 1 Current Year | 2 Prior Year |
|--|-------------------|-----------------|
| 1. Premiums collected net of reinsurance | 987,422,224 | 824,567,986 |
| 2. Net investment income | 86,628,791 | 90,368,055 |
| 3. Miscellaneous income | (13,408,743) | (4,640,319) |
| 4. Total (Lines 1 through 3) | 1,060,642,272 | 910,295,722 |
| 5. Benefit and loss related payments | 573,784,137 | 478,606,320 |
| 6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts | | |
| 7. Commissions, expenses paid and aggregate write-ins for deductions | 474,739,458 | 475,661,765 |
| 8. Dividends paid to policyholders | 370,608 | 4,851,751 |
| 9. Federal and foreign income taxes paid (recovered) net of \$ 0 tax on capital gains (losses) | 24,120,521 | 4,173,589 |
| 10. Total (Lines 5 through 9) | 1,073,014,724 | 963,293,425 |
| 11. Net cash from operations (Line 4 minus Line 10) | (12,372,452) | (52,997,703) |
| Cash from Investments | | |
| 12. Proceeds from investments sold, matured or repaid: | | |
| 12.1 Bonds | 844,408,438 | 532,741,923 |
| 12.2 Stocks | 11,257,920 | 17,157,212 |
| 12.3 Mortgage loans | 693,100 | 48,518 |
| 12.4 Real estate | | |
| 12.5 Other invested assets | | |
| 12.6 Net gains (or losses) on cash, cash equivalents and short-term investments | | (6,174) |
| 12.7 Miscellaneous proceeds | (246,227) | 5,402,377 |
| 12.8 Total investment proceeds (Lines 12.1 to 12.7) | 856,113,231 | 555,343,856 |
| 13. Cost of investments acquired (long-term only): | | |
| 13.1 Bonds | 638,203,428 | 710,530,355 |
| 13.2 Stocks | 44,678,296 | 3,691,637 |
| 13.3 Mortgage loans | 24,715,585 | 15,708,648 |
| 13.4 Real estate | | |
| 13.5 Other invested assets | 9,854,351 | |
| 13.6 Miscellaneous applications | (3,437,067) | (14,252,893) |
| 13.7 Total investments acquired (Lines 13.1 to 13.6) | 714,014,593 | 715,677,747 |
| 14. Net increase (decrease) in contract loans and premium notes | | |
| 15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14) | 142,098,638 | (160,333,891) |
| Cash from Financing and Miscellaneous Sources | | |
| 16. Cash provided (applied): | | |
| 16.1 Surplus notes, capital notes | | |
| 16.2 Capital and paid in surplus, less treasury stock | | |
| 16.3 Borrowed funds | | |
| 16.4 Net deposits on deposit-type contracts and other insurance liabilities | | |
| 16.5 Dividends to stockholders | 206,000,000 | |
| 16.6 Other cash provided (applied) | 12,738,984 | 106,669,689 |
| 17. Net cash from financing and miscellaneous sources (Lines 16.1 to Line 16.4 minus Line 16.5 plus Line 16.6) | (193,261,016) | 106,669,689 |
| RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS | | |
| 18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17) | (63,534,830) | (106,661,905) |
| 19. Cash, cash equivalents and short-term investments: | | |
| 19.1 Beginning of year | 103,959,856 | 210,621,761 |
| 19.2 End of year (Line 18 plus Line 19.1) | 40,425,026 | 103,959,856 |

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

| | | |
|---------|---|-------------|
| 20.0001 | 12.1 - Proceeds from investments sold, matured or repaid - Bonds | 223,945,513 |
| 20.0002 | 12.2 - Proceeds from investments sold, matured or repaid - Stocks | 9,085,665 |
| 20.0003 | 16.5 - Dividends to Stockholders | 157,861,033 |

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1 – PREMIUMS EARNED

| Line of Business | 1 Net Premiums Written per Column 6, Part 1B | 2 Unearned Premiums Dec. 31 Prior Year- per Col. 3, Last Year's Part 1 | 3 Unearned Premiums Dec. 31 Current Year- per Col. 5 Part 1A | 4 Premiums Earned During Year (Cols. 1 + 2 - 3) |
|--|--|---|---|---|
| 1. Fire | 16,975,163 | 8,741,937 | 9,175,867 | 16,541,233 |
| 2. Allied lines | 14,365,376 | 7,032,620 | 7,619,016 | 13,778,980 |
| 3. Farmowners multiple peril | 7,110,004 | 3,411,439 | 3,570,735 | 6,950,708 |
| 4. Homeowners multiple peril | 139,061,211 | 69,051,107 | 73,688,090 | 134,424,228 |
| 5. Commercial multiple peril | 170,650,873 | 89,818,837 | 87,330,602 | 173,139,108 |
| 6. Mortgage guaranty | | | | |
| 8. Ocean marine | | | | |
| 9. Inland marine | 15,572,788 | 7,657,633 | 7,486,689 | 15,743,732 |
| 10. Financial guaranty | | | | |
| 11.1 Medical professional liability—occurrence | 71,144 | 37,198 | 33,243 | 75,099 |
| 11.2 Medical professional liability—claims-made | 9,882 | 3,614 | 3,842 | 9,654 |
| 12. Earthquake | 3,147,638 | 1,653,333 | 1,599,452 | 3,201,519 |
| 13. Group accident and health | | | | |
| 14. Credit accident and health (group and individual) | | | | |
| 15. Other accident and health | (7,326) | 7,326 | | |
| 16. Workers' compensation | 83,088,021 | 34,737,061 | 35,005,697 | 82,819,385 |
| 17.1 Other liability—occurrence | 50,302,542 | 25,714,297 | 24,565,740 | 51,451,099 |
| 17.2 Other liability—claims-made | 2,116,273 | 912,837 | 983,309 | 2,045,801 |
| 17.3 Excess Workers' Compensation | | 45,192 | | 45,192 |
| 18.1 Products liability—occurrence | 1,295,708 | 888,772 | 684,771 | 1,499,709 |
| 18.2 Products liability—claims-made | | | | |
| 19.1,19.2 Private passenger auto liability | 181,140,869 | 52,294,749 | 65,254,686 | 168,180,932 |
| 19.3,19.4 Commercial auto liability | 77,644,350 | 39,561,221 | 37,594,584 | 79,610,987 |
| 21. Auto physical damage | 140,133,098 | 46,117,697 | 53,780,324 | 132,470,471 |
| 22. Aircraft (all perils) | | | | |
| 23. Fidelity | 601,711 | 504,307 | 492,402 | 613,616 |
| 24. Surety | 66,615,964 | 39,736,570 | 40,094,815 | 66,257,719 |
| 26. Burglary and theft | 28,478 | 17,597 | 13,723 | 32,352 |
| 27. Boiler and machinery | 17,537 | 3,118 | 7,619 | 13,036 |
| 28. Credit | | | | |
| 29. International | | | | |
| 30. Warranty | | | | |
| 31. Reinsurance-Nonproportional Assumed Property | | | | |
| 32. Reinsurance-Nonproportional Assumed Liability | | | | |
| 33. Reinsurance-Nonproportional Assumed Financial Lines | | | | |
| 34. Aggregate write-ins for other lines of business | | | | |
| 35. TOTALS | 969,941,304 | 427,948,462 | 448,985,206 | 948,904,560 |

| DETAILS OF WRITE-IN LINES | | | | |
|---|--|--|--|--|
| 3401. | | | | |
| 3402. | | | | |
| 3403. | | | | |
| 3498. Sum of remaining write-ins for Line 34 from overflow page | | | | |
| 3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above) | | | | |

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1A – RECAPITULATION OF ALL PREMIUMS

| Line of Business | 1 Amount Unearned (Running One Year or Less from Date of Policy) (a) | 2 Amount Unearned (Running More Than One Year from Date of Policy) (a) | 3 Earned but Unbilled Premium | 4 Reserve for Rate Credits and Retrospective Adjustments Based on Experience | 5 Total Reserve for Unearned Premiums Cols. 1 + 2 + 3 + 4 |
|--|--|--|---|---|--|
| 1. Fire | 9,175,792 | 75 | | | 9,175,867 |
| 2. Allied lines | 7,618,930 | 86 | | | 7,619,016 |
| 3. Farmowners multiple peril | 3,570,735 | | | | 3,570,735 |
| 4. Homeowners multiple peril | 73,688,090 | | | | 73,688,090 |
| 5. Commercial multiple peril | 86,143,335 | 1,438 | 1,180,648 | 5,182 | 87,330,603 |
| 6. Mortgage guaranty | | | | | |
| 8. Ocean marine | | | | | |
| 9. Inland marine | 7,457,364 | 29,325 | | | 7,486,689 |
| 10. Financial guaranty | | | | | |
| 11.1 Medical professional liability—occurrence | 33,243 | | | | 33,243 |
| 11.2 Medical professional liability—claims-made | 3,831 | 11 | | | 3,842 |
| 12. Earthquake | 1,599,452 | | | | 1,599,452 |
| 13. Group accident and health | | | | | |
| 14. Credit accident and health (group and individual) | | | | | |
| 15. Other accident and health | | | | | |
| 16. Workers' compensation | 33,856,393 | | 965,574 | 183,730 | 35,005,697 |
| 17.1 Other liability—occurrence | 24,337,280 | 91,542 | 142,099 | (5,182) | 24,565,739 |
| 17.2 Other liability—claims-made | 964,327 | 16,909 | 2,073 | | 983,309 |
| 17.3 Excess Workers' Compensation | | | | | |
| 18.1 Products liability—occurrence | 664,107 | 91 | 20,572 | | 684,770 |
| 18.2 Products liability—claims-made | | | | | |
| 19.1,19.2 Private passenger auto liability | 65,254,686 | | | | 65,254,686 |
| 19.3,19.4 Commercial auto liability | 37,234,306 | 360,279 | | | 37,594,585 |
| 21. Auto physical damage | 53,706,658 | 73,666 | | | 53,780,324 |
| 22. Aircraft (all perils) | | | | | |
| 23. Fidelity | 179,458 | 312,944 | | | 492,402 |
| 24. Surety | 21,376,853 | 18,717,961 | | | 40,094,814 |
| 26. Burglary and theft | 13,723 | | | | 13,723 |
| 27. Boiler and machinery | 7,619 | | | | 7,619 |
| 28. Credit | | | | | |
| 29. International | | | | | |
| 30. Warranty | | | | | |
| 31. Reinsurance-Nonproportional Assumed Property | | | | | |
| 32. Reinsurance-Nonproportional Assumed Liability | | | | | |
| 33. Reinsurance-Nonproportional Assumed Financial Lines | | | | | |
| 34. Aggregate write-ins for other lines of business | | | | | |
| 35. TOTALS | 426,886,182 | 19,604,327 | 2,310,966 | 183,730 | 448,985,205 |
| 36. Accrued retrospective premiums based on experience | | | | | (183,730) |
| 37. Earned but unbilled premiums | | | | | (2,310,966) |
| 38. Balance (Sum of Lines 35 through 37) | | | | | 446,490,509 |

| DETAILS OF WRITE-IN LINES | | | | | |
|---|--|--|--|--|--|
| 3401. | | | | | |
| 3402. | | | | | |
| 3403. | | | | | |
| 3498. Sum of remaining write-ins for Line 34 from overflow page | | | | | |
| 3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above) | | | | | |

(a) State here basis of computation used in each case

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1B – PREMIUMS WRITTEN

| Line of Business | 1 Direct Business (a) | Reinsurance Assumed | | Reinsurance Ceded | | 6 Net Premiums Written Cols. 1 + 2 + 3 - 4 - 5 |
|--|--------------------------------|-------------------------|---------------------------------|-----------------------|-------------------------------|--|
| | | 2 From Affiliates | 3 From Non- Affiliates | 4 To Affiliates | 5 To Non- Affiliates | |
| 1. Fire | 3,555,421 | 16,975,163 | | 3,555,421 | | 16,975,163 |
| 2. Allied lines | 3,439,157 | 14,365,376 | | 3,439,157 | | 14,365,376 |
| 3. Farmowners multiple peril | | 7,110,004 | | | | 7,110,004 |
| 4. Homeowners multiple peril | 10,320,336 | 139,061,211 | | 10,320,336 | | 139,061,211 |
| 5. Commercial multiple peril | 52,654,252 | 170,650,873 | | 52,654,252 | | 170,650,873 |
| 6. Mortgage guaranty | | | | | | |
| 8. Ocean marine | | | | | | |
| 9. Inland marine | 739,335 | 15,572,788 | | 739,335 | | 15,572,788 |
| 10. Financial guaranty | | | | | | |
| 11.1 Medical professional liability--occurrence | 745,778 | 71,144 | | 745,778 | | 71,144 |
| 11.2 Medical professional liability--claims-made | 107,409 | 9,882 | | 107,409 | | 9,882 |
| 12. Earthquake | 492,268 | 3,147,638 | | 492,268 | | 3,147,638 |
| 13. Group accident and health | | | | | | |
| 14. Credit accident and health (group and individual) | | | | | | |
| 15. Other accident and health | | (7,326) | | | | (7,326) |
| 16. Workers' compensation | 3,197,676 | 83,088,021 | | 3,197,676 | | 83,088,021 |
| 17.1 Other liability—occurrence | 12,989,138 | 50,302,542 | | 12,989,138 | | 50,302,542 |
| 17.2 Other liability—claims-made | 20,022,954 | 2,116,273 | | 20,022,954 | | 2,116,273 |
| 17.3 Excess Workers' Compensation | | | | | | |
| 18.1 Products liability—occurrence | 389,630 | 1,295,708 | | 389,630 | | 1,295,708 |
| 18.2 Products liability—claims-made | | | | | | |
| 19.1,19.2 Private passenger auto liability | 62,869,046 | 181,140,869 | | 62,869,046 | | 181,140,869 |
| 19.3,19.4 Commercial auto liability | 52,270,454 | 77,644,350 | | 52,270,454 | | 77,644,350 |
| 21. Auto physical damage | 56,953,908 | 140,133,098 | | 56,953,908 | | 140,133,098 |
| 22. Aircraft (all perils) | | | | | | |
| 23. Fidelity | 37,423 | 601,711 | | 37,423 | | 601,711 |
| 24. Surety | 2,723,800 | 66,615,964 | | 2,723,800 | | 66,615,964 |
| 26. Burglary and theft | 25,171 | 28,478 | | 25,171 | | 28,478 |
| 27. Boiler and machinery | 173,759 | 17,537 | | 173,759 | | 17,537 |
| 28. Credit | | | | | | |
| 29. International | | | | | | |
| 30. Warranty | | | | | | |
| 31. Reinsurance-Nonproportional Assumed Property | X X X | | | | | |
| 32. Reinsurance-Nonproportional Assumed Liability | X X X | | | | | |
| 33. Reinsurance-Nonproportional Assumed Financial Lines | X X X | | | | | |
| 34. Aggregate write-ins for other lines of business | | | | | | |
| 35. TOTALS | 283,706,915 | 969,941,304 | | 283,706,915 | | 969,941,304 |

| DETAILS OF WRITE-IN LINES | | | | | | |
|---|--|--|--|--|--|--|
| 3401. | | | | | | |
| 3402. | | | | | | |
| 3403. | | | | | | |
| 3498. Sum of remaining write-ins for Line 34 from overflow page | | | | | | |
| 3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above) | | | | | | |

(a) Does the company's direct premiums written include premiums recorded on an installment basis? Yes [] No [X]

If yes: 1. The amount of such installment premiums \$ 0

2. Amount at which such installment premiums would have been reported had they been recorded on an annualized basis \$ 0

EXHIBIT OF NET INVESTMENT INCOME

| | 1 Collected During Year | 2 Earned During Year |
|---|-------------------------------|----------------------------|
| 1. U.S. Government bonds | (a) 9,603,826 | 8,785,163 |
| 1.1 Bonds exempt from U.S. tax | (a) 39,105,141 | 33,965,064 |
| 1.2 Other bonds (unaffiliated) | (a) 29,177,922 | 31,184,313 |
| 1.3 Bonds of affiliates | (a) | |
| 2.1 Preferred stocks (unaffiliated) | (b) 1,180,588 | 1,077,150 |
| 2.11 Preferred stocks of affiliates | (b) | |
| 2.2 Common stocks (unaffiliated) | 86,133 | 128,257 |
| 2.21 Common stocks of affiliates | | |
| 3. Mortgage loans | (c) 1,667,477 | 1,792,143 |
| 4. Real estate | (d) | |
| 5. Contract loans | | |
| 6. Cash, cash equivalents and short-term investments | (e) 88,555 | 83,467 |
| 7. Derivative instruments | (f) | |
| 8. Other invested assets | | |
| 9. Aggregate write-ins for investment income | 502,704 | 502,704 |
| 10. Total gross investment income | 81,412,346 | 77,518,261 |
| 11. Investment expenses | | (g) 3,116,778 |
| 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) |
| 15. Aggregate write-ins for deductions from investment income | | |
| 16. Total deductions (Lines 11 through 15) | | 3,116,778 |
| 17. Net investment income (Line 10 minus Line 16) | | 74,401,483 |

| DETAILS OF WRITE-IN LINES | | |
|---|---------|---------|
| 0901. Miscellaneous Income/(Expense) | 502,704 | 502,704 |
| 0902. | | |
| 0903. | | |
| 0998. Summary of remaining write-ins for Line 09 from overflow page | | |
| 0999. Totals (Lines 0901 through 0903) plus 0998 (Line 09 above) | 502,704 | 502,704 |
| 1501. | | |
| 1502. | | |
| 1503. | | |
| 1598. Summary of remaining write-ins for Line 15 from overflow page | | |
| 1599. Totals (Lines 1501 through 1503) plus 1598 (Line 15 above) | | |

- (a) Includes \$ 2,104,976 accrual of discount less \$ 10,438,199 amortization of premium and less \$ 1,725,113 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 \$ 28,867 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 | 5,676,686 | | 5,676,686 | | |
| 1.1 Bonds exempt from U.S. tax | 8,379,979 | (1,243,320) | 7,136,659 | (3,205,159) | |
| 1.2 Other bonds (unaffiliated) | 2,160,072 | (2,353,798) | (193,726) | 3,145,238 | |
| 1.3 Bonds of affiliates | | | | | |
| 2.1 Preferred stocks (unaffiliated) | 111,363 | | 111,363 | 416,477 | |
| 2.11 Preferred stocks of affiliates | | | | | |
| 2.2 Common stocks (unaffiliated) | 847,899 | | 847,899 | 2,339,079 | |
| 2.21 Common stocks of affiliates | | | | 303,055 | |
| 3. Mortgage loans | (30,196) | | (30,196) | | |
| 4. Real estate | | | | | |
| 5. Contract loans | | | | | |
| 6. Cash, cash equivalents and short-term investments | | | | | |
| 7. Derivative instruments | | | | | |
| 8. Other invested assets | | | | | |
| 9. Aggregate write-ins for capital gains (losses) | | | | | |
| 10. Total capital gains (losses) | 17,145,803 | (3,597,118) | 13,548,685 | 2,998,690 | |

| DETAILS OF WRITE-IN LINES | | | | | |
|---|--|--|--|--|--|
| 0901. | | | | | |
| 0902. | | | | | |
| 0903. | | | | | |
| 0998. Summary of remaining write-ins for Line 09 from overflow page | | | | | |
| 0999. Totals (Lines 0901 through 0903) plus 0998 (Line 09 above) | | | | | |

NOTES TO FINANCIAL STATEMENTS

Note 1 - Summary of Significant Accounting Policies

A. Accounting Practices

Effective January 1, 2001, and subject to any deviations prescribed or permitted by the State of Washington, the accompanying financial statements of General Insurance Company of America (the "Company") have been prepared in conformity with the National Association of Insurance Commissioners ("NAIC") *Accounting Practices and Procedures Manual* ("APP Manual").

B. Use of Estimates in the Preparation of the Financial Statements

The preparation of financial statements requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, revenues, and expenses. It also requires estimates in the disclosure of contingent assets and liabilities. Actual results could differ from these estimates.

C. Accounting Policies

Premiums are earned over the terms of the related policies and reinsurance contracts. Unearned premium reserves are established to cover the unexpired portion of premiums written. Such reserves are computed by pro-rata methods. Expenses incurred in connection with acquiring new insurance business, including acquisition costs such as sales commissions, are charged to operations as incurred. Expenses incurred are reduced for ceding allowances received or receivable.

In addition, the Company applies the following accounting policies, where applicable:

1. Short term investments are carried at cost, adjusted where appropriate for amortization of premium or discount, or fair value as specified by the Purposes and Procedures Manual of the NAIC Securities Valuation Office (SVO Manual).
2. Bonds are carried at cost, adjusted where appropriate for amortization of premium or discount, or fair value as specified by the SVO Manual.
3. Common stocks are carried at fair value, except that investments in stocks of subsidiaries, controlled and affiliated ("SCA") companies are carried according to Note 1C(7).
4. Preferred stocks are carried at cost or fair value as specified by the SVO Manual. Preferred stocks of SCA companies are carried according to Note 1C(7).
5. Mortgage loans are carried at unpaid principal balances, less impairments as specified by the SVO Manual.
6. Mortgage backed/asset backed securities are carried at amortized cost or fair value based on guidance in the SVO Manual. Prepayment assumptions for mortgage backed/asset backed securities are updated monthly using the Bloomberg data service. The retrospective adjustment method is used to value all mortgage backed/asset backed securities.
7. Investments in SCA companies are carried in accordance with SSAP No. 97, *Investment in Subsidiaries, Controlled Entities and Affiliates*, and the SVO Manual.
8. Investments in joint ventures, partnerships, and limited liability companies are carried in accordance with SSAP No. 48, *Joint Ventures, Partnerships and Limited Liability Companies*, and the SVO Manual.
9. Derivative Securities, refer to Note 8.
10. Investment income is anticipated as a factor in the premium deficiency calculation, in accordance with SSAP No. 53, *Property Casualty Contracts - Premiums*. Refer to Note 30.
11. Unpaid losses and loss adjustment expenses include an amount determined from individual case estimates and loss reports and an amount, based on past experience, for losses incurred but not reported. Such liabilities are necessarily based on assumptions and estimates, and while management believes the amount is adequate, the ultimate liability may be in excess of or less than the amount provided. The methods, for making such estimates and for establishing the resulting liability, are continually reviewed and follow current standards of practice. Any adjustments to the liability are reflected in the period that they are determined.
12. The Company did not change its capitalization policy in 2010.
13. The Company has no pharmaceutical rebate receivables.

Note 2 - Accounting Changes and Correction of Errors

- A. There were no material changes in accounting principles or corrections of errors during the year.

Note 3 - Business Combinations and Goodwill

- A. Statutory Purchase Method

The Company did not enter into any statutory purchases during the year.

NOTES TO FINANCIAL STATEMENTS

B. Statutory Mergers

The Company did not enter into any statutory mergers during the year.

C. Impairment Loss

The Company did not recognize an impairment loss during the period.

Note 4 - Discontinued Operations

The Company has no discontinued operations.

Note 5 - Investments

A. Mortgage Loans, including Mezzanine Real Estate Loans

During 2010, the Company participated in direct investment in commercial mortgage loans using an experienced external manager, StanCorp Mortgage Investors.

- (1) The maximum and minimum lending rates for mortgage loans during 2010 were 10.25% and 5.24% respectively.
- (2) During 2010, the Company did not reduce interest rates of any outstanding mortgage loans.
- (3) The maximum loan to value of any loan written during 2010 was 75%.
- (4) No loans had interest more than 180 days past due.
- (5) There were \$2,867 in taxes, assessments and any amounts advanced and not included in the mortgage loan.
- (6) There was no recorded investment in impaired loans as of December 31, 2010.
- (7) There was no recorded investment in impaired loans without a related allowance for credit losses.
- (8) There was no average recorded investment in impaired loans for 2010.
- (9) There was no interest income recognized for impaired loans during 2010.
- (10) There was no interest income recognized on a cash basis for impaired loans during 2010.
- (11)
 - a) There was no allowance for credit losses in 2010 or 2009.
 - b) There were \$32,300 of additions to the allowance charged to operations in 2010 and \$0 in 2009.
 - c) There were \$32,300 of direct write-downs charged against the allowance in 2010 and \$0 in 2009.
 - d) There were no recoveries of amounts previously charged off.
 - e) The balance in the allowance for credit losses was \$0 in 2010 and \$0 in 2009.

- (12) The Company recognizes interest income on its impaired loans upon receipt.

B. Troubled Debt Restructuring for Creditors

- (1) There was no recorded investment in loans for which impairment has been recognized.
- (2) There was no realized capital loss.
- (3) There were no commitments to lend additional funds to debtors owing receivables whose terms have been modified in trouble debt restructuring.
- (4) The Company accrues interest income on impaired loans to the extent it is deemed collectible and the loan continues to perform under its original or restructured contractual terms. Interest income on non performing loans is generally recognized on a cash basis.

C. Reverse Mortgages

The Company has no reverse mortgages.

D. Loaned Backed Securities

1. Prepayment speed assumptions are updated monthly with data sourced from the Bloomberg data service.
2. All Loaned Backed Securities with a recognized other-than-temporary impairment disclosed in the aggregate during 2010 as of December 31, 2010: None.
3. Each Loaned Backed Security with a recognized other-than-temporary impairment held by the Company at December 31, 2010:

| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|-----------|---|----------------------|--|--|----------------------------|--|
| CUSIP | Book/Adj Carrying Value Amortized cost before current period OTTI | Projected Cash Flows | Recognized other-than-temporary impairment | Amortized cost after other-than-temporary impairment | Fair Value at time of OTTI | Date of Financial Statement Where Report |
| 30605AAX1 | \$2,634,629 | \$1,204,593 | \$1,430,036 | \$1,204,593 | \$1,189,300 | 3/31/2010 |
| 59023XAB2 | 670,877 | 586,824 | 84,053 | 586,824 | 586,823 | 3/31/2009 |
| 59023XAB2 | 444,875 | 386,128 | 58,747 | 386,128 | 386,128 | 12/31/2009 |
| 59023XAB2 | 294,274 | 287,282 | 6,992 | 287,282 | 275,008 | 3/31/2010 |
| 61749BAB9 | 700,147 | 665,046 | 35,101 | 665,046 | 665,047 | 12/31/2009 |
| 61749BAB9 | 584,967 | 579,799 | 5,168 | 579,799 | 568,632 | 3/31/2010 |
| 61749BAB9 | 472,189 | 469,899 | 2,290 | 469,899 | 436,622 | 12/31/2010 |
| 30604VAD0 | \$2,180,596 | \$1,749,745 | \$430,851 | \$1,749,745 | \$1,749,745 | 12/31/2010 |

NOTES TO FINANCIAL STATEMENTS

4. All impaired Loan Backed Securities for which an other-than-temporary impairment has not been recognized in earnings as a realized loss as of December 31, 2010:

| | 1 | 2 |
|---|---------------------|------------------------|
| | Less Than 12 Months | Greater Than 12 Months |
| Gross Unrealized Loss | (86,889) | (1,265,526) |
| Fair Value of Securities with Unrealized Losses | 8,373,700 | 6,042,249 |

5. The Company reviews fixed income securities for impairment on a quarterly basis. Securities are reviewed for both quantitative and qualitative considerations including, but not limited to: (a) the extent of the decline in fair value below book value, (b) the duration of the decline, (c) significant adverse changes in the financial condition or near term prospects of the investment or issuer, (d) significant change in the business climate or credit ratings of the issuer, (e) general market conditions and volatility, (f) industry factors, and (g) the past impairment of the security holding or the issuer. If the Company believes a decline in the value of a particular investment is temporary, the decline is recorded as an unrealized loss in policyholders' equity. If the decline is believed to be "other-than-temporary," and the Company believes it will not be able to collect all cash flows due on its fixed income securities, then the carrying value of the investment is written down to the expected cash flow amount and a realized loss is recorded as a credit impairment.

E. Repurchase Agreements and Securities Lending

1. The Company did not enter into any repurchase agreements during the year.
2. The Company maintained collateral for loaned securities.
 - (1) For loaned securities, Company policies require a minimum of 102% of the fair value of securities loaned to be maintained as collateral. Cash collateral received is invested in short-term investments.
 - (2) The Company has not pledged any of its assets as collateral.
 - (3) Sources of collateral are cash and securities. Cash collateral is reinvested by the lending agent in short term securities.
3. Aggregate Amount of Contractually open cash collateral positions:

| Aging of Collateral | Total Fair Value |
|---------------------------|------------------|
| Open | \$ 9,728,930 |
| 30 Days or Less | |
| 31 to 60 Days | |
| 61 to 90 Days | |
| Greater than 90 Days | |
| Sub-Total | 9,728,930 |
| Securities Received | - |
| Total Collateral Received | \$ 9,728,930 |

4. Securities Lending Transactions Administered by an Affiliated Agent

Not applicable

5. Collateral Reinvestment

- a. Aggregate Amount Cash Collateral Reinvested

| | Amortized Cost | Fair Value |
|-----------------------------|----------------|-------------|
| Open | - | - |
| 30 Days or Less | \$5,208,850 | \$5,208,968 |
| 31 to 60 Days | 4,184,843 | 4,185,039 |
| 61 to 90 Days | 334,809 | 334,924 |
| 90 to 120 Days | - | - |
| 121 to 180 Days | - | - |
| 181 to 365 Days | - | - |
| 1 to 2 Years | - | - |
| 2 to 3 Years | - | - |
| Greater than 3 Years | - | - |
| Subtotal | 9,728,502 | 9,728,930 |
| Securities Received | - | - |
| Total Collateral Reinvested | \$9,728,502 | \$9,728,930 |

NOTES TO FINANCIAL STATEMENTS

- b. Maturity profile of the cash reinvestment program sufficiently matches loan profile with liquidity demands consistent with an open loan program.

F. Real Estate

The Company does not have real estate.

G. Investments in Low-Income Housing Tax Credits

The Company does not hold investments in low-income housing tax credits.

Note 6 - Joint Ventures, Partnerships & Limited Liability Companies

- A. Investments in joint ventures, partnerships and limited liability companies that exceed 10% of its admitted assets.

The Company has no investments in joint ventures, partnerships, or limited liability companies.

- B. Impairments on joint ventures, partnerships or limited liability companies

The Company does not own any investments in joint ventures, partnerships, and limited liability companies.

Note 7 - Investment Income

- A. Accrued Investment Income

The Company does not admit investment income due and accrued if amounts are over 90 days past due (over 180 days for mortgage loans in default).

- B. Amounts Nonadmitted

No amounts were excluded as of December 31, 2010.

Note 8 - Derivative Instruments

The Company's investment activities do not include derivatives. However, the Company may acquire derivatives as additions to bond, common stock, or preferred stock investments. These derivatives are ancillary to the overall investment and are immaterial to the underlying investment portfolio.

Note 9 - Income Taxes

- A. The components of the net deferred tax assets (DTAs) and liabilities (DTLs) recognized in the Company's Assets, Liabilities, Surplus and Other Funds are as follows:

| | December 31, 2010 | | | December 31, 2009 | | | Change | | |
|--|-------------------|-----------|--------------|-------------------|-----------|--------------|--------------|-------------|--------------|
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| | | | (Col 1 + 2) | | | (Col 4 + 5) | (Col 1 - 4) | (Col 2 - 5) | (Col 7 + 8) |
| | Ordinary | Capital | Total | Ordinary | Capital | Total | Ordinary | Capital | Total |
| Gross Deferred Tax Assets | 76,169,175 | 2,527,525 | 78,696,700 | 82,546,435 | 3,003,365 | 85,549,800 | (6,377,260) | (475,840) | (6,853,100) |
| Statutory Valuation Allowance Adjustment | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Adjusted Gross Deferred Tax Assets | 76,169,175 | 2,527,525 | 78,696,700 | 82,546,435 | 3,003,365 | 85,549,800 | (6,377,260) | (475,840) | (6,853,100) |
| Deferred Tax Liabilities | (10,903,217) | (276,483) | (11,179,700) | (4,405,800) | 0 | (4,405,800) | (6,497,417) | (276,483) | (6,773,900) |
| Net DTA (DTL) | 65,265,958 | 2,251,042 | 67,517,000 | 78,140,635 | 3,003,365 | 81,144,000 | (12,874,677) | (752,323) | (13,627,000) |
| Deferred Tax Assets Nonadmitted | (14,764,322) | (221,986) | (14,986,308) | (25,709,300) | 0 | (25,709,300) | 10,944,978 | (221,986) | 10,722,992 |
| Net Admitted DTA (DTL) | 50,501,636 | 2,029,056 | 52,530,692 | 52,431,335 | 3,003,365 | 55,434,700 | (1,929,699) | (974,309) | (2,904,008) |

The Company has elected to admit additional DTAs pursuant to SSAP No. 10R, paragraph 10e. The current period election does not differ from the prior reporting period.

The amount of each result or component of the calculation, by tax character, of paragraphs 10a., 10bi., 10bii., 10c.:

| | December 31, 2010 | | | December 31, 2009 | | | Change | | |
|---|-------------------|-----------|-------------|-------------------|-----------|-------------|-------------|-------------|-------------|
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| | | | (Col 1 + 2) | | | (Col 4 + 5) | (Col 1 - 4) | (Col 2 - 5) | (Col 7 + 8) |
| | Ordinary | Capital | Total | Ordinary | Capital | Total | Ordinary | Capital | Total |
| Recoverable through loss carrybacks (10a.) | 25,316,679 | 2,029,056 | 27,345,735 | 28,119,000 | 1,380,000 | 29,499,000 | (2,802,321) | 649,056 | (2,153,265) |
| Lesser of: | | | | | | | | | |
| Expected to be recognized within one year (10bi.) | 15,511,472 | 0 | 15,511,472 | 15,679,664 | 1,623,365 | 17,303,029 | (168,192) | (1,623,365) | (1,791,557) |
| 10% of adjusted capital and surplus (10bii.) | | | 32,535,256 | | | 47,064,408 | | | |
| Adj. gross DTAs offset against existing DTLs (10c.) | 10,903,217 | 276,483 | 11,179,700 | 4,405,800 | 0 | 4,405,800 | 6,497,417 | 276,483 | 6,773,900 |
| Total | 51,731,368 | 2,305,539 | 54,036,907 | 48,204,464 | 3,003,365 | 51,207,829 | 3,526,904 | (697,826) | 2,829,078 |

NOTES TO FINANCIAL STATEMENTS

The amount of each result or component of the calculation, by tax character, of paragraphs 10ei., 10eiiia., 10eiiib., and 10eiii.:

| | December 31, 2010 | | | December 31, 2009 | | | Change | | |
|---|-------------------|-----------|-------------|-------------------|-----------|-------------|-------------|-------------|-------------|
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| | | | (Col 1 + 2) | | | (Col 4 + 5) | (Col 1 - 4) | (Col 2 - 5) | (Col 7 + 8) |
| | Ordinary | Capital | Total | Ordinary | Capital | Total | Ordinary | Capital | Total |
| Recoverable through loss carrybacks (10ei.) | 25,316,679 | 2,029,056 | 27,345,735 | 28,119,000 | 1,380,000 | 29,499,000 | (2,802,321) | 649,056 | (2,153,265) |
| Lesser of: | | | | | | | | | |
| Expected to be recognized within three years (10eiiia.) | 25,184,957 | 0 | 25,184,957 | 24,312,335 | 1,623,365 | 25,935,700 | 872,622 | (1,623,365) | (750,743) |
| 15% of adjusted capital and surplus (10eiiib.) | | | 48,802,884 | | | 70,596,612 | | | |
| Adj. gross DTAs offset against existing DTLs (10eiii.) | 10,903,217 | 276,483 | 11,179,700 | 4,405,800 | 0 | 4,405,800 | 6,497,417 | 276,483 | 6,773,900 |
| Total | 61,404,853 | 2,305,539 | 63,710,392 | 56,837,135 | 3,003,365 | 59,840,500 | 4,567,718 | (697,826) | 3,869,892 |

| Used in SSAP No. 10R, Paragraph 10.d. | December 31, 2010 | December 31, 2009 | Change |
|---------------------------------------|-------------------|-------------------|---------------|
| Total Adjusted Capital | 399,937,662 | 539,365,414 | (139,427,752) |
| Authorized Control Level | 86,606,260 | 89,687,686 | (3,081,426) |

The following amounts result from the calculation in paragraphs 10a., 10b., and 10c.:

| | December 31, 2010 | | | December 31, 2009 | | | Change | | |
|----------------------------------|-------------------|-----------|---------------|-------------------|-----------|---------------|-------------|-------------|---------------|
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| | | | (Col 1 + 2) | | | (Col 4 + 5) | (Col 1 - 4) | (Col 2 - 5) | (Col 7 + 8) |
| | Ordinary | Capital | Total | Ordinary | Capital | Total | Ordinary | Capital | Total |
| Admitted Deferred Tax Assets | 40,828,151 | 2,029,056 | 42,857,207 | 43,798,664 | 3,003,365 | 46,802,029 | (2,970,513) | (974,309) | (3,944,822) |
| Admitted Assets | | | 2,069,941,757 | | | 2,251,599,196 | | | (181,657,439) |
| Adjusted Statutory Surplus | | | 399,937,662 | | | 539,365,414 | | | (139,427,752) |
| Total Adjusted Capital from DTAs | | | 399,937,662 | | | 539,365,414 | | | (139,427,752) |

| Increase due to SSAP No. 10R, Paragraph 10.e. | December 31, 2010 | | | December 31, 2009 | | | Change | | |
|---|-------------------|---------|---------------|-------------------|---------|---------------|-------------|-------------|---------------|
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| | | | (Col 1 + 2) | | | (Col 4 + 5) | (Col 1 - 4) | (Col 2 - 5) | (Col 7 + 8) |
| | Ordinary | Capital | Total | Ordinary | Capital | Total | Ordinary | Capital | Total |
| Admitted Deferred Tax Assets | 9,673,485 | 0 | 9,673,485 | 8,632,671 | 0 | 8,632,671 | 1,040,814 | 0 | 1,040,814 |
| Admitted Assets | | | 2,079,615,242 | | | 2,260,231,867 | | | (180,616,625) |
| Adjusted Statutory Surplus | | | 409,611,147 | | | 547,998,085 | | | (138,386,938) |
| Total Adjusted Capital from DTAs | | | 409,611,147 | | | 547,998,085 | | | (138,386,938) |

| | December 31, 2010 | | |
|---|-------------------|-----------------|---------------|
| | (1) | (2) | (3) |
| | | | (Col 1 + 2) |
| Impact of Tax Planning Strategies | Ordinary Percent | Capital Percent | Total Percent |
| (a) Adjusted Gross DTAs (% of Total Adjusted Gross DTAs) | 0% | 0% | 0% |
| (b) Net Admitted Adjusted Gross DTAs (% of Total Net Admitted Gross DTAs) | 0% | 0% | 0% |

B. The Company does not have any DTLs described in SSAP No. 10R, *Income Taxes*, paragraph 6d.

C. The provisions for incurred taxes on earnings for the years ended December 31 are:

| | 2010 | 2009 |
|---|-------------|-------------|
| Federal | (2,905,339) | 27,483,031 |
| Foreign | 0 | 0 |
| Realized capital gains | 4,742,039 | (2,254,981) |
| Federal and foreign income taxes incurred | 1,836,700 | 25,228,050 |

The Company's deferred tax assets and liabilities result primarily from limits on unearned premium reserves, discounting of unpaid losses and LAE reserves, statutory non-admitted assets, accrued benefits, permanent impairments and accrual of market discount.

NOTES TO FINANCIAL STATEMENTS

The change in deferred income taxes is comprised of the following:

| | 2010 |
|---|--------------|
| Change in net deferred income tax (without unrealized gain or loss) | (12,683,528) |
| Change in tax effect of unrealized (gains) losses | (943,472) |
| Total change in net deferred income tax | (13,627,000) |

- D. Effective tax rates differ from the current statutory rate of 35% principally due to the effects of tax-exempt interest, unearned premium reserves, accrual of market discount, return to provision adjustments and discounting of unpaid losses and LAE reserves.
- E. The amount of Federal income taxes incurred and available for recoupment in the event of future losses is \$10,250,700 from the current year and \$19,852,278 from the preceding year.

The Company has no remaining net operating loss carry forward available to offset future net income subject to Federal income taxes.

The Company does not have deposits admitted under Section 6603 of the Internal Revenue Code.

- F. The Company's Federal income tax return is consolidated with the following entities:

| | |
|--|--|
| <p>Access Insurance Services, Co. America First Insurance Company American Economy Insurance Company American States Insurance Company American States Lloyds Insurance Company Avomark Insurance Company (merged 2/23/2010) Berkeley Holding Company Associates, Inc. Bridgefield Casualty Insurance Company Capitol Court Corporation Capitol Agency, Inc., The (Ohio corporation) Dissolved 11/17/2010 Cascade Disability Management, Inc. Commercial Aviation Insurance, Inc. Companies Agency of Pennsylvania, Inc. (Dissolved 9/9/2010) Copley Venture Capital, Inc. Emerald City Insurance Agency, Inc. Excelsior Insurance Company First National Insurance Company of America Florida State Agency, Inc. (Dissolved 8/20/2010) General America Corporation of Texas Golden Eagle Insurance Corporation Hawkeye-Security Insurance Company Indiana Insurance Company LEXCO Limited Liberty Assignment Corporation Liberty Financial Services, Inc. Liberty Insurance Corporation Liberty Insurance Underwriters Inc. Liberty International Holdings Inc. Liberty Life Holdings Inc. Liberty Management Services, Inc. Liberty Mutual Agency Corporation Liberty Mutual Group Inc. Liberty Mutual Insurance Company Liberty Northwest Insurance Corporation Liberty RE (Bermuda) Limited Liberty Surplus Insurance Corporation LIU Specialty Insurance Agency Inc. LM Insurance Corporation LM Property & Casualty Insurance Company LRE Properties, Inc. Mid-American Fire & Casualty Company OCASCO Budget, Inc. Ohio Casualty Corporation Open Seas Solutions, Inc. Peerless Indemnity Insurance Company Pilot Insurance Services, Inc. S.C. Bellevue, Inc. Safeco Corporation Safeco Insurance Company of America Safeco Insurance Company of Indiana Safeco Lloyds Insurance Company Safeco Properties, Inc. San Diego Insurance Company</p> | <p>AMBCO Capital Corporation America First Lloyds Insurance Company American Fire & Casualty Company American States Insurance Company of Texas American States Preferred Insurance Company Barrier Ridge LLC Berkeley Management Corporation Bridgefield Employers Insurance Company Capitol Agency, Inc., The (Arizona corporation) Capitol Agency, Inc., The (Tennessee corporation) (Dissolved 7/1/2010) Colorado Casualty Insurance Company Companies Agency of New York, Inc. (Dissolved 3/3/2010) Consolidated Insurance Company Diversified Settlements, Inc. Employers Insurance Company of Wausau F.B. Beattie & Co., Inc. First State Agency Inc. General America Corporation General Insurance Company of America Gulf States AIF, Inc. Heritage-Summit HealthCare, Inc. Insurance Company of Illinois Liberty-USA Corporation Liberty Energy Canada, Inc. Liberty Hospitality Group, Inc. Liberty Insurance Holdings, Inc. Liberty International Europe Inc. Liberty Life Assurance Company of Boston Liberty Lloyds of Texas Insurance Company Liberty Mexico Holdings Inc. Liberty Mutual Fire Insurance Company Liberty Mutual Holding Company Inc. Liberty Mutual Personal Insurance Company Liberty Personal Insurance Company Liberty Sponsored Insurance (Vermont) Inc. LIH-RE of America Corporation LM General Insurance Company LM Personal Insurance Company LMHC Massachusetts Holdings Inc. Mid-American Agency, Inc. (Dissolved 8/20/2010) North Pacific Insurance Company OCI Printing, Inc. Ohio Security Insurance Company Oregon Automobile Insurance Company Peerless Insurance Company Rianoc Research Corporation SAFECARE Company, Inc. Safeco General Agency, Inc. Safeco Insurance Company of Illinois Safeco Insurance Company of Oregon Safeco National Insurance Company Safeco Surplus Lines Insurance Company SCIT, Inc. State Agency, Inc. (Indiana corporation) (Dissolved 8/23/2010)</p> |
|--|--|

NOTES TO FINANCIAL STATEMENTS

St. James Insurance Company Ltd.
 State Agency, Inc. (Wisconsin corporation) (Dissolved
 8/24/2010)
 Summit Consulting, Inc. of Louisiana
 The First Liberty Insurance Corporation
 The Ohio Casualty Insurance Company
 Wausau General Insurance Company
 West American Insurance Company
 Winmar of the Desert, Inc.
 Winmar-Metro, Inc.

Summit Consulting, Inc.
 Summit Holding Southeast, Inc.
 The Midwestern Indemnity Company
 The Netherlands Insurance Company
 The National Corporation
 Wausau Business Insurance Company
 Wausau Underwriters Insurance Company
 Winmar Company, Inc.
 Winmar Oregon, Inc.

The method of federal income tax allocation is subject to a written agreement. Allocation is based upon separate return calculations with credit applied for losses as appropriate. The Company has the enforceable right to recoup prior year payments in the event of future losses.

Note 10 - Information Concerning Parent, Subsidiaries and Affiliates

- A. All of the outstanding shares of capital stock of the Company are held by Safeco Corporation (“Safeco”), a company incorporated in Washington. Safeco is wholly owned by Liberty Mutual Agency Corporation, an insurance holding company incorporated in Delaware. Liberty Mutual Agency Corporation is wholly owned by Liberty Insurance Holdings, Inc., an insurance holding company incorporated in Delaware. Liberty Insurance Holdings, Inc. is wholly owned by Liberty Mutual Insurance Company (“LMIC”), a Massachusetts insurance company. The ultimate parent of LMIC is Liberty Mutual Holding Company Inc., a Massachusetts company.
- B. Transactions between the Company and its affiliates are listed on Schedule Y Part 2.
- C. There have been no material transactions with the Company’s affiliates during 2010.
- D. At December 31, 2010, the Company reported a net \$26,668,959 due to affiliates. In general, the terms of the inter-company arrangements require settlement at least quarterly.
- E. The Company has not made any guarantees or initiated any undertakings for the benefit of affiliates which result in a material contingent exposure of the Company’s or affiliates’ assets or liabilities.
- F. Refer to Note 26 for information regarding the Amended and Restated Reinsurance Pooling Agreement.

The Company is a party to a services agreement (the “Agreement”) with Peerless Insurance Company (“PIC”) and other affiliates. The Agreement allows PIC to provide services related to common management function including, but not limited to, coordinating marketing and advertising, information systems support, payroll and human resource services, actuarial support, accounting and other financial services, as well as consulting and other services as the parties may request.

The Company is a party to an investment management agreement with Liberty Mutual Group Inc. (“LMGI”), investment management agreements with Liberty Mutual Investment Advisors LLC (“LMIA”) and cash management agreements with LMIA. Under these agreements, LMGI and LMIA provide services to the Company.

The Company is a party to a management services agreement with LMIC. Under the agreement, LMIC may provide services related to common management functions including, but not limited to, accounting, financial, tax and auditing, information technology and support, purchasing, payroll and employee benefits, policy administration, real estate management, legal, general administration, as well as consulting and other services as the parties may request.

The Company is party to Amended and Restated Short Term Borrowing Agreement with Safeco Corporation and affiliates (11/07).

The Company is party to a Federal Tax Sharing Agreement between LMIC and affiliates (Refer to Note 9F).

- G. The Company is a member of a holding company structure as illustrated in Schedule Y Part 1.
- H. The Company does not own shares of any upstream intermediate or ultimate parent, either directly or indirectly via a downstream subsidiary, controlled or affiliated company.
- I. The Company does not own investments in subsidiary, controlled or affiliated companies that exceed 10% of its admitted assets.
- J. The Company did not recognize any impairment write down for its investments in subsidiary, controlled, or affiliated entities during the statement period.
- K. The Company does not hold any investments in foreign insurance subsidiaries.
- L. The Company does not hold any investments in downstream non-insurance holding companies.

Note 11 - Debt

- A. Debt (Including Capital Notes)

The Company has no debt, including capital notes.

NOTES TO FINANCIAL STATEMENTS

B. Federal Home Loan Bank Agreements

The Company has not entered into any agreements with the Federal Home Loan Bank.

Note 12 - Retirement Plans, Deferred Compensation, Compensated Absences, Post Employment Benefits and Other Postretirement Benefit Plans

As the Company does not have direct employees, the Company does not have any direct obligations for a defined benefit plan, deferred compensation arrangements, compensated absences or other post retirement benefit plans. Services for the operation of the Company are provided under provisions of the management services agreements as described in note 10 F.

As a result of the acquisition of Safeco Corporation, by Liberty Mutual on September 22, 2008, the Safeco Corporation's eligible U.S. employees became employees of Liberty Mutual and began participating in non contributory defined benefit pension plans and contributory defined contribution pension plans sponsored by LMGI, effective January 1, 2009. The Safeco 401(k) plan assets merged into the Liberty Mutual Employees' Thrift-Incentive plan in May of 2009.

The Safeco Corporation sponsored a cash balance defined benefit pension plan (CBP) covering a wide range of former Company employees. Safeco Corporation terminated the CBP effective December 31, 2008. The Internal Revenue Service issued a favorable letter of determination for the Plan on May 6, 2010. As a result, all assets of the plan were distributed to plan participants by the end of the third quarter of 2010. The final distribution resulted in a settlement charge of \$4,094,970. The CBP pension costs are subject to the inter-company pooling agreement described in Note 26. These costs amounted to \$640,416 and \$131,193 in 2010 and 2009, respectively. Also, a CBP additional minimum liability of \$0 and \$456,689, also subject to the inter-company pooling agreement, was recognized in 2010 and 2009 respectively in accordance with SSAP 89 and is reported as a component of unassigned funds (surplus). The Company has no legal obligation for benefits under this plan.

Note 13 - Capital and Surplus, Shareholders' Dividend Restrictions and Quasi-Reorganizations

1. The Company has 20,000 shares authorized, issued and outstanding as of December 31, 2010. All shares have a stated par value of \$250.
2. Preferred Stock
Not applicable
3. There are no dividend restrictions.
4. The Company paid dividends to its parent in 2010 of:

| | Ordinary | Extraordinary | Return of Capital | Total Dividends |
|--------|--------------|---------------|-------------------|-----------------|
| March | \$87,723,771 | \$68,276,229 | | \$156,000,000 |
| August | | | \$50,000,000 | 50,000,000 |
| Total | \$87,723,771 | \$68,276,229 | \$50,000,000 | \$206,000,000 |

5. The maximum amount of dividends that can be paid by Washington-domiciled insurance companies to shareholders without prior approval of the Insurance Commissioner is the greater of (a) 10% of surplus or (b) net income, subject to the availability of accumulated undistributed earnings. The maximum dividend payout that may be made without prior approval in 2011 is \$65,297,488.
6. As of December 31, 2010, the Company has restricted surplus of \$9,673,485 from recording the increase in admitted adjusted gross DTA's as a result of applying the revised guidance in SSAP No. 10R, *Income Taxes*, and pre-tax restricted surplus of \$1,989,867 resulting from retroactive reinsurance contracts.
7. The Company had no advances to surplus.
8. The Company does not hold stock for special purposes.
9. The Company had changes in special surplus funds resulting from prior year's retroactive reinsurance contracts during 2010 and from the adoption of the revised guidance on calculating admitted adjusted gross DTA's in SSAP 10R.
10. The portion of unassigned funds (surplus) represented by cumulative net unrealized gains is \$5,008,483 after applicable deferred taxes of \$162,575.
11. Surplus Notes
Not applicable
12. Quasi re-organization (dollar impact)
Not applicable
13. Quasi re-organization (effective date)
Not applicable

NOTES TO FINANCIAL STATEMENTS

Note 14 - Contingencies

A. Contingent Commitments

The Company has made no commitments, contingent commitments or guarantees on behalf of affiliates, except as indicated in Note 10E.

B. Assessments

The Company is subject to guaranty fund and other assessments by the states in which it writes business. Guaranty fund assessments are accrued at the time of insolvencies. Other assessments are accrued either at the time of assessments or in the case of premium based assessments, at the time the premiums are written, or, in the case of loss based assessments, at the time the losses are incurred.

The Company has accrued a liability for guaranty funds and other assessments of \$4,190,772 that is offset by future premium tax credits of \$766,814. This represents management's best estimate based on information received from the states in which the Company writes business and may change due to factors including the Company's share of the ultimate cost of current insolvencies.

Current assessments are expected to be paid out in the next five years, while premium tax offsets are expected to be realized in the next eleven years, beginning in 2010.

During 2010 there were no material insolvencies to report. The Company continues to remit payments relating to prior year insolvencies.

C. Gain Contingencies

Not applicable

D. Claims related extra contractual obligations and bad faith losses stemming from lawsuits

The Company paid the following amounts in the reporting period to settle claims related extra contractual obligations or bad faith claims stemming from lawsuits.

| | |
|--|----------|
| | Direct |
| Claims related ECO and bad faith losses paid during the reporting period | \$71,935 |

Number of claims where amounts were paid to settle claims related extra contractual obligations or bad faith claims resulting from lawsuits during the reporting period.

| (a) 0-25 Claims | (b) 26-50 Claims | (c) 51-100 Claims | (d) 101-500 Claims | (e) More than 500 Claims |
|----------------------|-----------------------|------------------------|-------------------------|-------------------------------|
| X | | | | |

Indicate whether claim count information is disclosed per claim or per claimant.

(f) Per Claim [X] (g) Per Claimant []

E. All Other Contingencies

Lawsuits arise against the Company in the normal course of business. Contingent liabilities arising from litigation, income taxes, and other matters are not considered material in relation to the financial position of the Company.

As disclosed in Note 9 F, the Company is a member of a controlled group for federal income tax purposes, and that group includes Liberty Mutual Group Inc. ("LMGI"). LMGI is the plan sponsor of the Liberty Mutual Retirement Benefit Plan, a qualified plan under federal law. Pursuant to federal law, if LMGI has not made the minimum required contributions with respect to the Liberty Mutual Retirement Benefit Plan, the Company, jointly and severally with all other members of the controlled group, would be contingently liable to make such contributions.

Note 15 - Leases

A. Lessee Leasing Arrangements

The Company leases office space, plant and equipment under various non cancelable operating lease arrangements. The Company has also entered into sale-leaseback arrangements with unrelated parties on certain property, plant and equipment. The transactions have been accounted for in accordance with SSAP No. 22. The Company has a purchase option for all property, plant and equipment at the end of each respective lease.

NOTES TO FINANCIAL STATEMENTS

The Company's minimum lease obligations under these agreements are as follows:

| <u>Year(s)</u> | <u>Sale Lease-back</u> | <u>All Other Operating Lease Arrangements</u> |
|-------------------|----------------------------|---|
| 2011 | \$521,874 | \$3,673,044 |
| 2012 | 521,874 | 3,626,530 |
| 2013 | 521,874 | 2,444,000 |
| 2014 | 43,490 | 2,292,357 |
| 2015 | 0 | 1,277,616 |
| 2016 & thereafter | 0 | 1,826,107 |
| Total | <u>\$1,609,112</u> | <u>\$15,139,654</u> |

B. Leasing as a Significant Part of Lessor's Business Activities

Leasing is not a significant part of the Company's business activities.

Note 16 - Information About Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk

The Company is not exposed to financial instruments with off-balance sheet risk or concentration of credit risk.

Note 17 - Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

A. Transfers of Receivables Reported as Sales

The Company did not have any transfers of receivables reported as sales during the year.

B. Transfers and Servicing of Financial Assets

The Company participates in a Securities Lending Program to generate additional income, whereby certain fixed income and mortgage backed securities are loaned for a period of time from the Company's portfolio to qualifying third parties, via a lending agent. The Company does not participate in term loans; therefore, the Company does not have contractual collateral transactions that extend beyond one year from the reporting date. Borrowers of these securities provide collateral equal to or in excess of 102% of the market value of the loaned securities. Acceptable collateral may be in the form of cash or U.S. Government securities, such as Treasuries and Agency Bonds. Collateral is not restricted and currently \$0 extends beyond one year from December 31, 2010. The market value of the loaned securities is monitored and additional collateral is obtained if the market value of the collateral falls below 102% of the market value of the loaned securities. Additionally, the lending agent indemnifies the Company against borrower defaults. Cash collateral is carried as an asset with an offsetting liability on the balance sheet, as the Company can exercise discretion as to how the collateral is invested. The loaned securities remain a recorded asset of the Company.

At December 31, 2010 the total fair value of securities on loan was \$9,350,383, with corresponding collateral value of \$9,728,930 of which \$9,728,930 represents cash collateral.

C. Wash Sales

The Company did not have any wash sale transactions during the year.

Note 18 - Gain or Loss from Uninsured Accident and Health Plans and the Uninsured Portion of Partially Insured Plans

A. Administrative Services Only (ASO) Plans

Not applicable

B. Administrative Services Contract (ASC) Plans

In 2008, certain members of the PIC Amended and Restated Reinsurance Pooling Agreement (refer to Note 26) agreed to become participating insurers of the California Earthquake Authority ("CEA"), a publicly-managed, privately funded organization that provides residential earthquake insurance in California. As participating insurers of the CEA, the companies act as third party administrators and perform certain administrative services on behalf of the CEA, including underwriting, policy issuance, premium collection, and claims payment. The CEA reimburses the companies for commissions and claims paid on behalf of the CEA. The companies also receive an administrative fee equal to 3.43% of premium and 9% of claims paid. These administrative fees are subject to the inter-company pooling agreement. In 2010, the Company recorded net CEA administrative fees of \$97,520.

C. Medicare or Other Similarly Structured Cost Based Reimbursement Contracts

Not applicable

NOTES TO FINANCIAL STATEMENTS

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

The Company has no direct premiums written or produced through managing general agents or third party administrators.

Note 20 – Fair Value Measurements

A. Inputs Used for Assets and Liabilities Measured at Fair Value

1. Fair Value Measurements by Levels 1, 2 and 3

Fair value is the price that would be received to sell an asset or would be paid to transfer a liability in an orderly transaction between market participants at the measurement date. In determining fair value, the Company primarily uses the market approach which generally utilizes market transaction data for identical or similar instruments.

The hierarchy level assigned to each security in the Company's portfolio is based on the Company's assessment of the transparency and reliability of the inputs used in the valuation of each instrument at the measurement date. The highest priority is given to Level 1 measurements and the lowest priority to Level 3 measurements. Securities are classified based on the lowest level of input that is significant to the fair value measurement. The Company recognizes transfers between levels at the end of each reporting period. The three hierarchy levels are defined as follows:

- Level 1 — Valuations based on unadjusted observable quoted market prices in active markets for identical assets or liabilities that the Company has the ability to access at the measurement date.
- Level 2 — Valuations based on directly or indirectly observable inputs (other than Level 1 prices) at the measurement date, such as quoted prices in active markets or prices in markets that are not active for similar assets or liabilities or other inputs that are observable.
- Level 3 — Valuations based on inputs that are unobservable and reflect the Company's own assumptions about the assumptions that market participants might use.

The following table summarizes the Company's assets and liabilities that are measured at fair value at December 31, 2010:

| 1 | 2 | 3 | 4 | 5 |
|---------------------------------------|--------------|--------------|----------|--------------|
| Description | Level 1 | Level 2 | Level 3 | Total |
| Assets at fair value | | | | |
| Bonds | | | | |
| Issuer Obligations | - | \$25,798,887 | - | \$25,798,887 |
| Commercial Mortgage-Backed Securities | - | 11,512,640 | - | 11,512,640 |
| Total Bonds | - | 37,311,527 | - | 37,311,527 |
| Preferred Stocks | | | | |
| Industrial and Miscellaneous | - | 13,754,650 | - | 13,754,650 |
| Total Preferred Stocks | - | 13,754,650 | - | 13,754,650 |
| Common Stocks | | | | |
| Industrial and Miscellaneous | \$46,231,892 | - | \$12,052 | 46,243,944 |
| Total Common Stocks | 46,231,892 | - | 12,052 | 46,243,944 |
| Total assets at fair value | \$46,231,892 | \$51,066,177 | \$12,052 | \$97,310,121 |
| Liabilities at fair value | | | | |
| Total liabilities at fair value | \$0 | \$0 | \$0 | \$0 |

The Company did not have significant transfers between Levels 1 and 2 during the year ended December 31, 2010.

2. Rollforward of Level 3 Items

The following tables set forth the fair values of assets basis classified as Level 3 within the fair value hierarchy:

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|-----------------|--------------------------|---------------------------|-----------------------------|--|---|--|--------------------------|
| | Balance at 12/31/2009 | Transfers into Level 3 | Transfers out of Level 3 | Total gains and (losses) included in Net Income | Total gains and (losses) included in Surplus | Purchases, issuances, sales and settlements | Balance at 12/31/2010 |
| Bonds | | | | | | | |
| Preferred Stock | | | | | | | |
| Common Stock | \$20,597 | | | | \$(8,545) | | \$12,052 |
| Total | \$20,597 | | | | \$(8,545) | | \$12,052 |

NOTES TO FINANCIAL STATEMENTS

3. Policy on Transfers Into and Out of Level 3

Transfers in and/or out of Level 3 are due to re-evaluation of the observability of pricing inputs.

4. Inputs and Techniques Used for Fair Value

Fixed Maturities

At each valuation date, the Company uses various valuation techniques to estimate the fair value of its fixed maturities portfolio. The primary method for valuing the Company's securities is through independent third-party valuation service providers. For positions where valuations are not available from independent third-party valuation service providers, the Company utilizes broker quotes and internal pricing methods to determine fair values. The Company obtains a single non-binding price quote from a broker familiar with the security who, similar to the Company's valuation service providers, may consider transactions or activity in similar securities, as applicable, among other information. The brokers providing price quotes are generally from the brokerage divisions of leading financial institutions with market making, underwriting and distribution expertise regarding the security subject to valuation. The evaluation and prioritization of these valuation sources is systematic and predetermined resulting in a single quote or price for each financial instrument. The following describes the techniques generally used to determine the fair value of the Company's fixed maturities by asset class:

U.S. government and agency

U.S. government and agency securities consist primarily of bonds issued by the U.S. Treasury and mortgage pass-through agencies such as the Federal Home Loan Bank, the Federal National Mortgage Association and the Federal Home Loan Mortgage Corporation. As the fair values of the Company's U.S. Treasury securities are based on unadjusted market prices, they are classified within Level 1. The fair value of U.S. government agency securities is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active, benchmark yields, reported trades, bids, offers and credit spreads. Accordingly, the fair value of U.S. government agency securities is classified within Level 2.

Mortgage-Backed Securities

The Company's portfolio of residential mortgage-backed securities ("MBS") and commercial MBS are originated by both agencies and non-agencies, the majority of which are pass-through securities issued by U.S. government agencies. The fair value of MBS is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active, benchmark yields, contractual cash flows, prepayment speeds, collateral performance and credit spreads. Accordingly, the fair value of MBS is primarily classified within Level 2.

Asset-Backed Securities

Asset-backed securities ("ABS") include mostly investment-grade bonds backed by pools of loans with a variety of underlying collateral, including automobile loan receivables, credit card receivables, and collateralized loan obligation securities originated by a variety of financial institutions. The fair value of ABS is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active, benchmark yields, contractual cash flows, prepayment speeds, collateral performance and credit spreads. Accordingly, the fair value of ABS is primarily classified within Level 2.

Municipals

The Company's municipal portfolio comprises bonds issued by U.S. domiciled state and municipal entities. The fair value of municipal securities is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active, benchmark yields, broker quotes, issuer ratings, reported trades and credit spreads. Accordingly, the fair value of municipal securities is primarily classified within Level 2.

Corporate debt and other

Corporate debt securities consist primarily of investment-grade debt of a wide variety of corporate issuers and industries. The fair value of corporate and other securities is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active, benchmark yields, new issuances, issuer ratings, reported trades of identical or comparable securities, bids, offers and credit spreads. Accordingly, the fair value of corporate and other securities is primarily classified within Level 2. In the event third-party vendor valuation is not available, prices are determined using non-binding price quotes from a broker familiar with the security. In this instance, the valuation inputs are generally unobservable and the fair value is classified within Level 3.

Foreign government securities

Foreign government securities comprise bonds issued by foreign governments and their agencies along with supranational organizations. The fair value of foreign government securities is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active, benchmark yields, broker quotes, issuer ratings, reported trades of identical or comparable securities and credit spreads. Accordingly, the fair value of foreign government securities is primarily classified within Level 2.

Equity Securities

Equity securities include common and preferred stocks. Common stocks with fair values based on quoted market prices in active markets are classified in Level 1. Common stocks with fair values determined using observable market inputs

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that include quoted prices for identical or similar assets in markets that are not active are classified in Level 2. The fair value of preferred stock is generally determined using observable market inputs that include quoted prices for identical or similar assets in markets that are not active. Accordingly, the fair value of preferred stock is primarily classified within Level 2.

Other Investments

Other investments include primarily international loans, foreign cash deposits and equity investments in privately held businesses. International loans and cash deposits are primarily valued using quoted prices for similar instruments in active markets; these assets are categorized as Level 2 of the fair value hierarchy. Equity investments in privately held businesses are valued using internal management estimates; they are categorized as Level 3 of the hierarchy. Limited partnership investments, which represent the remainder of the other investment balance on the consolidated balance sheet, are not subject to these disclosures and therefore are excluded from the above table.

5. Derivative Fair Values

Not applicable

B. This Disclosure was removed by NAIC December 2010.

C. Other Fair Value Disclosures

Not applicable

D. Reasons Not Practical to Estimate Fair Value

Not applicable

Note 21 - Other Items

A. Extraordinary Items

The Company has no extraordinary items to report.

B. Troubled Debt Restructuring: Debtors

Not applicable

C. Other Disclosures

1) Assets in the amount of \$80,334,833 and \$80,886,451 as of December 31, 2010 and 2009, respectively, were on deposit with government authorities or trustees as required by law.

2) 2010 North Carolina Private Passenger Automobile Escrow

As mandated by North Carolina Statute #58-7-26(C), the escrow account of the Company was \$228,221 at December 31, 2010.

4) Interrogatory 6.1

In 2010, as a member of the inter-company reinsurance pooling arrangement in which PIC is the pool leader, the Company had the benefit, together with its affiliates that cede business to PIC or that are members of the reinsurance pooling arrangement, of Workers' Compensation Catastrophe XOL reinsurance with limits of \$110,000,000 part of \$200,000,000 xs \$100,000,000 purchased by PIC and covering PIC's direct and assumed from affiliates workers' compensation business.

Interrogatory 6.3

In 2010, as a member of the inter-company pooling arrangement in which PIC is the pool leader, the Company had the benefit, together with its affiliates that cede business to PIC or that are members of the reinsurance pooling arrangement, of traditional Property Catastrophe XOL reinsurance, with limits of \$742,500,000 part of \$825,000,000 xs \$500,000,000 covering PIC's direct and assumed from affiliates property business.

D. The Company routinely assesses the collectability of its premium receivable balances. The Company does not believe that amounts in excess of non-admitted amounts are material.

E. Business Interruption Insurance Recoveries

The Company does not purchase business interruption coverage.

F. State Transferable Tax Credits

(1) Carrying value of transferable state tax credits gross of any related state tax liabilities and total unused transferable state tax credits by state and in total

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| <u>Description of State Transferable Tax Credits</u> | <u>State</u> | <u>Carrying Value</u> | <u>Unused Amount</u> |
|--|--------------|-----------------------|----------------------|
| Historical Rehabilitation Credit | CT | \$80,000 | \$80,000 |
| <u>Total</u> | | <u>\$80,000</u> | <u>\$80,000</u> |

(2) Method of Estimating Utilization of Remaining Transferable State Tax Credits

The Company estimated the utilization of the remaining transferable State Tax Credits by projecting future premium taking into account policy growth and rate changes, projecting future tax liability based on projected premium, tax rates and tax credits, and comparing projected future tax liability to the availability of remaining transferable State Tax Credits.

(3) Impairment Loss

The Company has not recognized any impairment losses associate with its Transferable State Tax Credits.

G. Subprime-Mortgage-Related Risk Exposure

- The Company has not purchased securities characterized by the market as subprime. The Company reviews such factors as average FICO scores, loan to value ratios, and levels of documentation when evaluating securities. The Company's only exposure to subprime was inherited through past acquisitions of insurance companies.
- The Company does not have any direct exposure through investments in sub-prime mortgage loans.
- The Company has direct exposure through investments in residential mortgage-backed securities.

| <u>Actual Cost</u> | <u>Book Adjusted Carrying Value</u> | <u>Fair Value</u> | <u>Other Than Temporary Impairments Recognized</u> |
|--------------------|-------------------------------------|-------------------|--|
| \$1,583,275 | \$1,565,970 | \$1,569,812 | \$192,350 |

- The Company does not have any underwriting exposure to sub-prime mortgage risk.

Note 22 - Events Subsequent

- A. The Company evaluated subsequent events through February 24, 2011, the date the financial statements were available to be issued.

There were no events subsequent to December 31, 2010 that would require disclosure.

Note 23 - Reinsurance

A. Unsecured Reinsurance Recoverable

Excluding amounts arising pursuant to the Intercompany Reinsurance Agreement, as described in Note 26, there are no unsecured reinsurance recoverables with an individual reinsurer which exceed 3% of policyholder's surplus.

B. Reinsurance Recoverable in Dispute

There are no reinsurance recoverables in dispute from an individual reinsurer which exceeds 5% of the Company's surplus. In addition, the aggregate reinsurance recoverables in dispute do not exceed 10% of the Company's surplus.

C. Reinsurance Assumed & Ceded

- The following table sets forth the maximum return premium and commission equity due the reinsurers or the Company if all of the Company's assumed and ceded reinsurance were canceled as of December 31, 2010.

| | Assumed Reinsurance | | Ceded Reinsurance | | Net Reinsurance | |
|------------|---------------------|-------------------|-------------------|-------------------|-----------------|-------------------|
| | UEP | Commission Equity | UEP | Commission Equity | UEP | Commission Equity |
| Affiliates | \$446,490,508 | \$66,973,576 | \$122,819,427 | \$18,422,914 | \$323,671,081 | \$48,550,662 |
| All Other | - | - | - | - | - | - |
| Total | \$446,490,508 | \$66,973,576 | \$122,819,427 | \$18,422,914 | \$323,671,081 | \$48,550,662 |

Direct Unearned Premium Reserve: \$122,819,427

- Certain contracts provide for additional or return commissions based on the actual loss experience of the produced or reinsured business. Amounts accrued at December 31, 2010 are as follows:

| Description | Direct | Assumed | Ceded | Net |
|---------------------------|--------|--------------|-------|--------------|
| Contingent commissions | - | \$23,954,055 | - | \$23,954,055 |
| Sliding scale adjustments | - | - | - | - |
| Other profit commissions | - | - | - | - |
| Totals | - | \$23,954,055 | - | \$23,954,055 |

NOTES TO FINANCIAL STATEMENTS

3. The Company does not use protected cells as an alternative to traditional reinsurance

D. Uncollectible Reinsurance

The Company did not write off any uncollectible balances in the current year.

E. Commutation of Ceded Reinsurance

The Company did not commute any reinsurance treaties in the current year.

F. Retroactive Reinsurance

The Company's retroactive reinsurance is a result of the Intercompany Reinsurance Agreement as described in Note 26.

| | | Assumed | Ceded |
|----|--|----------------|-------|
| a. | Reserves Transferred: | | |
| | 1. Initial | \$43,683,128 | - |
| | 2. Adjustments – Prior Year(s) | (35,396,830) | - |
| | 3. Adjustments – Current Year | 490,597 | - |
| | 4. Total | \$8,776,896 | - |
| b. | Consideration Paid or Received: | | |
| | 1. Initial | \$35,946,459 | - |
| | 2. Adjustments – Prior Year(s) | 1,370,150 | - |
| | 3. Adjustments – Current Year | - | - |
| | 4. Total | \$37,316,609 | - |
| c. | Amounts Recovered / Paid – Cumulative: | | |
| | 1. Initial | | |
| | 2. Adjustments – Prior Year(s) | \$44,353,432 | - |
| | 3. Adjustments – Current Year | (148,700) | - |
| | 4. Total | \$44,204,732 | - |
| d. | Special Surplus from Retroactive Reinsurance: | | |
| | 1. Initial Surplus Gain or Loss | \$(9,083,423) | - |
| | 2. Adjustments – Prior Year(s) | (7,586,452) | - |
| | 3. Adjustments – Current Year | (341,898) | - |
| | 4. Current Year Special Surplus | 1,989,867 | - |
| | 5. Cumulative Total Transferred to Unassigned Funds | \$(19,001,640) | - |
| e. | All cedents and reinsurers included in the above transactions: | | |
| | Peerless Insurance Company | \$8,776,896 | - |
| | Total | \$8,776,896 | - |

There are no reinsurance contracts covering losses that have occurred prior to the inception of the contract that have not been accounted for in conformity with the NAIC Accounting Practices and Procedures Manual.

G. Reinsurance Accounted for as a Deposit

The Company has not entered into any reinsurance agreements that have been accounted for as deposits as of December 31, 2010.

H. Disclosures for the Transfer of Property and Casualty Run-off Agreements

The Company has not entered into any property and casualty run-off agreements which qualify for prospective reinsurance accounting treatment, pursuant to SSAP No. 62R, *Property and Casualty Reinsurance*.

Note 24 - Retrospectively Rated Contracts and Contracts Subject to Redetermination

- A. The Company estimates accrued retrospective premium adjustments through the review of each individual retrospectively rated risk, comparing case-base loss development with that anticipated in the policy contract to arrive at the best estimate of return or additional retrospective premium.
- B. Accrued retrospective premiums are recorded as a component of written premiums.
- C. For detail of net premium written subject to retrospective rating features refer to Schedule P, Part 7A.
- D. Ten Percent of the amount of accrued retrospective premiums not offset by retrospective return premiums, other liabilities to the same party (other than loss and loss adjustment expense reserves), or collateral as permitted by SSAP No. 66, *Retrospectively Rated Contracts*, has been non-admitted.

NOTES TO FINANCIAL STATEMENTS

| | | |
|----|--|-----------|
| a. | Total accrued retro premium | \$936,294 |
| b. | Unsecured amount | |
| c. | Less: Non-admitted amount (10%) | 93,495 |
| d. | Less: Non-admitted for any person for whom agents' balances or uncollected premiums are non-admitted | |
| e. | Admitted amount (a) - (c) - (d) | \$842,799 |

Note 25 - Changes in Incurred Losses and Loss Adjustment Expenses

Incurred loss and loss adjustment expense attributed to insured events on prior years has decreased \$11,180,029 during 2010. This decrease was primarily the result of updated reserving analysis and improving loss trends in the Commercial Multiple Peril \$2,772,038, Fidelity/Surety \$8,970,476 and Private Passenger Auto Liability \$10,259,774 lines. The decrease was also the result of a reclassification of loss adjustment expenses to other underwriting expenses in the Commercial Multiple Peril line. This was partially offset by weakening loss trends in the Workers' Compensation \$5,274,549, Other-Including Credit, Accident and Health \$3,562,348, and Nonproportional Assumed Liability \$2,783,672 lines. Prior estimates are revised as additional information becomes known regarding individual claims.

Note 26 - Intercompany Pooling Arrangements

The Company is a member of the PIC Amended and Restated Reinsurance Pooling Agreement consisting of the following affiliated companies:

| | | NAIC Company <u>Number</u> | Pooling <u>Percentage</u> | Line of <u>Business</u> |
|--|--|----------------------------------|------------------------------|----------------------------|
| Lead Company: | Peerless Insurance Company ("PIC") | 24198 | 25.20% | All Lines |
| Affiliated Pool Companies: | The Ohio Casualty Insurance Company ("OCIC") | 24074 | 20.40% | All Lines |
| | Safeco Insurance Company of America ("SICOA") | 24740 | 15.20% | All Lines |
| | General Insurance Company of America ("GICA") | 24732 | 9.20% | All Lines |
| | American States Insurance Company ("ASIC") | 19704 | 7.60% | All Lines |
| | American Economy Insurance Company ("AEIC") | 19690 | 5.60% | All Lines |
| | Indiana Insurance Company ("IIC") | 22659 | 4.80% | All Lines |
| | Golden Eagle Insurance Corporation ("GEIC") | 10836 | 3.00% | All Lines |
| | Peerless Indemnity Insurance Company ("PIIC") | 18333 | 3.00% | All Lines |
| | Safeco Insurance Company of Illinois ("SICIL") | 39012 | 2.00% | All Lines |
| | The Netherlands Insurance Company ("NIC") | 24171 | 1.80% | All Lines |
| | American States Preferred Insurance Company ("ASPCO") | 37214 | 0.80% | All Lines |
| | First National Insurance Company of America ("FNICA") | 24724 | 0.80% | All Lines |
| | American Fire and Casualty Company ("AFCIC") | 24066 | 0.60% | All Lines |
| | America First Insurance Company ("AFIC") | 12696 | 0.00% | All Lines |
| | America First Lloyd's Insurance Company ("AFLIC") | 11526 | 0.00% | All Lines |
| | American States Insurance Company of Texas ("ASICT") | 19712 | 0.00% | All Lines |
| | American States Lloyds Insurance Company ("ASLCO") | 31933 | 0.00% | All Lines |
| | Colorado Casualty Insurance Company ("CCIC") | 41785 | 0.00% | All Lines |
| | Consolidated Insurance Company ("CIC") | 22640 | 0.00% | All Lines |
| | Excelsior Insurance Company ("EIC") | 11045 | 0.00% | All Lines |
| | Hawkeye-Security Insurance Company ("HSIC") | 36919 | 0.00% | All Lines |
| | Mid-American Fire & Casualty Company ("MAFCC") | 23507 | 0.00% | All Lines |
| | The Midwestern Indemnity Company ("MWIC") | 23515 | 0.00% | All Lines |
| | Montgomery Mutual Insurance Company ("MMIC") | 14613 | 0.00% | All Lines |
| | National Insurance Association ("NIA") | 27944 | 0.00% | All Lines |
| | Ohio Security Insurance Company ("OSIC") | 24082 | 0.00% | All Lines |
| | Safeco Insurance Company of Indiana ("SICIN") | 11215 | 0.00% | All Lines |
| | Safeco Insurance Company of Oregon ("SICOR") | 11071 | 0.00% | All Lines |
| | Safeco Lloyds Insurance Company ("SLICO") | 11070 | 0.00% | All Lines |
| | Safeco National Insurance Company ("SNIC") | 24759 | 0.00% | All Lines |
| | Safeco Surplus Lines Insurance Company ("SSLIC") | 11100 | 0.00% | All Lines |
| | West American Insurance Company ("WAIC") | 44393 | 0.00% | All Lines |
| | | | 100.0% | |
| 100% Quota Share Affiliated Companies: | Liberty Northwest Insurance Corporation ("LNW") | 41939 | 0.00% | All Lines |
| | North Pacific Insurance Company ("NPIC") | 23892 | 0.00% | All Lines |
| | Oregon Automobile Insurance Company ("OAIC") | 23922 | 0.00% | All Lines |
| | Liberty Mutual Mid-Atlantic Insurance Company ("LMMAIC") | 14486 | 0.00% | All Lines |

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Under the terms of the Reinsurance Agreements, the sequence of transactions is as follows:

- (a) Each Affiliated Pool Company cedes its net underwriting activity to the Lead Company. Each 100% Quota Share Affiliated Company cedes its net underwriting activity to the Lead Company.
- (b) After recording the assumed affiliate transactions noted above, the Lead Company records 100% of its external assumed and ceded reinsurance activity.
- (c) The Lead Company's remaining underwriting activity, after processing all internal and external reinsurance is retroceded to the pool members in accordance with each company's pool participation percentage, as noted above.
- (d) There were no members that are parties to reinsurance agreements with non-affiliated reinsurers covering business subject to the pooling agreement that have a contractual right of direct recovery from the non-affiliated reinsurer per the terms of such reinsurance agreements.
- (e) There were no discrepancies between entries regarding pooled business on the assumed and ceded reinsurance schedules of the Lead Company and corresponding entries on the assumed and ceded reinsurance schedules of other pooled participants.
- (f) The write-off of uncollectible reinsurance is pooled and the Provision for Reinsurance is recognized by the entity placing the outbound external reinsurance
- (g) Amounts due (to)/from affiliated entities participating in the PIC Amended and Restated Reinsurance Pooling Agreement as at December 31, 2010:

| Affiliate: | Amount: |
|--|--------------|
| Peerless Insurance Company | (24,025,293) |
| The Netherlands Insurance Company | (2,042,444) |
| Indiana Insurance Company | (5,446,518) |
| Peerless Indemnity Insurance Company | (3,404,074) |
| Ohio Casualty Insurance Company | (20,160,168) |
| Ohio Security Insurance Company | 972,506 |
| West America Insurance Company | (1,234,734) |
| American Fire and Casualty Insurance Company | (1,083,517) |
| Golden Eagle Insurance Corporation | (3,404,074) |
| American Economy Insurance Company | 251,450 |
| American States Insurance Company | (14,046,151) |
| American States Insurance Company of Texas | (318,718) |
| American States Lloyds Insurance Company | (3,029) |
| American States Preferred Insurance Company | 1,378,282 |
| First National Insurance Company | 4,977,377 |
| General Insurance Company of America | (9,795,724) |
| Safeco Insurance Company of America | 23,738,540 |
| Safeco Insurance Company of Illinois | 38,606,218 |
| Safeco Insurance Company of Indiana | 5,927,201 |
| Safeco Insurance Company of Oregon | 7,829,541 |
| Safeco Lloyds Insurance Company | 1,513,595 |
| Safeco National Insurance Company | 69,388 |
| Safeco Surplus Insurance Company | (60,938) |

Effective January 1, 2010, LMMAIC cancelled its participation in the Peerless Insurance Company ("PIC") Amended and Restated Reinsurance Pooling Agreement and concurrently became a participant in the Liberty Mutual Inter-Company Reinsurance Agreement with a 0.0% pool participation percentage and entered into an 100% Quota Share Reinsurance Agreement with PIC. Pursuant to the 100% Quota Share Reinsurance Agreement with PIC, the Company continues to cede the business it wrote for the Peerless Pool to PIC. New business is ceded to Liberty Mutual Insurance Company ("LMIC"), the lead company in the Liberty Pool.

Effective January 1, 2010, BCIC and BEIC novated their 100% Quota Share Reinsurance Agreements with PIC and entered into 100% Quota Share Inter-Company Reinsurance Agreements with LMIC.

Effective February 23, 2010, Avomark Insurance Company merged with WAIC. WAIC was the surviving entity.

Note 27- Structured Settlements

- A. As a result of purchased annuities with the claimant as payee, The Company no longer carries reserves of \$11,211,209 after applying Inter-Company Reinsurance Agreement percentages. The Company is contingently liable should the issuers of the purchased annuities fail to perform under the terms of the annuities. The amount of unrecorded loss contingencies related to the purchased annuities was \$11,211,209 as of December 31, 2010.
- B. A summary of purchased structured settlement annuities exceeding 1% of policyholders' surplus and whereby the Company has not obtained a release of liability from the claimant is as follows:

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| Life Insurance Company and Location | Licensed in Company's State of Domicile (Yes/No) | Statement Value of Annuities |
|--|---|------------------------------|
| Symetra Life Insurance Company Bellevue, Washington | Yes | \$4,882,393 |

Note 28 - Health Care Receivables

Not applicable

Note 29 - Participating Policies

Not applicable

Note 30 - Premium Deficiency Reserves

| | |
|---|------------|
| 1. Liability carried for premium deficiency reserves | \$0 |
| 2. Date of the most recent evaluation of this liability | 12/31/2010 |
| 3. Was anticipated investment income utilized in the calculation? | Yes |

Note 31 - High Dollar Deductible Policies

The Company does not have any high deductible policies.

Note 32 - Discounting of Liabilities for Unpaid Losses and Unpaid Loss Adjustment Expenses

For Workers' Compensation, the Company discounts its reserves for unpaid losses using a tabular discount on the long-term annuity portion of certain workers' compensation claims. The tabular discount is based on the Unit Statistical Plan tables as approved by the respective states at an annual discount rate of 4.0%. The December 31, 2010 liabilities subject to discount were carried at a value representing a discount of \$12,489,224 net of all reinsurance.

For all other lines, the Company does not discount its reserves for unpaid losses and loss adjustment expenses.

Note 33 - Asbestos/Environmental Reserves

The Company has exposure to asbestos and environmental claims which emanate principally from general liability policies written prior to the mid-1980's. In establishing the Company's asbestos and environmental reserves, the Company estimates case basis reserves for anticipated losses and bulk reserves for loss adjustment expenses and incurred but not reported losses. The Company maintained casualty excess of loss reinsurance during the relevant periods. The reserves are reported net of expected recoveries from reinsurers and include any reserves reported by ceding reinsurers on assumed reinsurance contracts.

Factors Contributing to Uncertainty in Establishing Adequate Reserves

The process of establishing reserves for asbestos and environmental claims is subject to greater uncertainty than the establishment of reserves for liabilities relating to other types of insurance claims. A number of factors contribute to this greater uncertainty surrounding the establishment of asbestos and environmental reserves, including, without limitation: (i) the lack of available and reliable historical claims data as an indicator of future loss development, (ii) the long waiting periods between exposure and manifestation of any bodily injury or property damage, (iii) the difficulty in identifying the source of asbestos or environmental contamination, (iv) the difficulty in properly allocating liability for asbestos or environmental damage, (v) the uncertainty as to the number and identity of insured's with potential exposure, (vi) the cost to resolve claims, and (vii) the collectability of reinsurance.

The uncertainties associated with establishing reserves for asbestos and environmental losses and loss adjustment expenses are compounded by the differing, and at times inconsistent, court rulings on environmental and asbestos coverage issues involving: (i) the differing interpretations of various insurance policy provisions and whether asbestos and environmental losses are or were ever intended to be covered, (ii) when the loss occurred and what policies provide coverage, (iii) whether there is an insured obligation to defend, (iv) whether a compensable loss or injury has occurred, (v) how policy limits are determined, (vi) how policy exclusions are applied and interpreted, (vii) the impact of entities seeking bankruptcy protection as a result of asbestos-related liabilities, (viii) whether clean-up costs are covered as insured property damage, and (ix) applicable coverage defenses or determinations, if any, including the determination as to whether or not an asbestos claim is a products/completed operation claim subject to an aggregate limit and the available coverage, if any, for that claim. These uncertainties cannot be reasonably estimated, but could have a material impact on the Company's future operating results and financial condition.

In the last few years the Company, as well as the industry generally, has seen decreases in the number of asbestos claims being filed. This turn to a more favorable trend is due to a number of factors. Screening activity used by some lawyers to find new plaintiffs utilized questionable practices discovered in the Federal Silica Multi District Litigation. Court decisions in several key states have been favorable to defendants. More importantly, several states have enacted legislation in the past few years that contain medical criteria provisions aimed at reducing the number of lawsuits filed by unimpaired plaintiffs and providing prompt and fair compensation to those who meet the criteria.

Uncertainty Regarding Reserving Methodologies

As a result of the significant uncertainty inherent in determining a company's asbestos and environmental liabilities and establishing related reserves, the amount of reserves required to adequately fund the Company's asbestos and environmental claims cannot be accurately estimated using conventional reserving methodologies based upon historical data and trends. As a result, the use of conventional reserving methodologies frequently has to be supplemented by subjective considerations

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including managerial judgment. In that regard, the estimation of asbestos claims and associated liabilities and the analysis of environmental claims considered prevailing applicable law and certain inconsistencies of court decisions as to coverage, plaintiffs' expanded theories of liability, and the risks inherent in major litigation and other uncertainties, the Company believes that in future periods it is possible that the outcome of the continued uncertainties regarding asbestos and environmental related claims could result in an aggregate liability that differs from current reserves by an amount that could be material to the Companies' future operating results and financial condition.

In the third quarter of 2009, the Company completed its biennial ground-up asbestos reserve study. The study was completed by a multi-disciplined team of internal claims, legal, reinsurance and actuarial personnel, and it included all major segments of the Company's direct, assumed, and ceded asbestos claims. As part of the internal review, potential exposures of certain policyholders were individually evaluated using the Company's proprietary stochastic model, which is consistent with the latest published actuarial paper on asbestos reserving. Among the factors reviewed in depth by the team of specialists were the type of business, level of exposure, coverage limits, geographic distribution of products, types of injury, state jurisdictions, legal defenses, and reinsurance potential. The remaining policyholders (those with less potential exposure) were evaluated using aggregate methods that utilized information and experience specific to these insureds. Between comprehensive studies, the Company monitors asbestos activity to determine whether or not any adjustment to reserves is warranted. The Company also completed its annual study on the environmental claims liability, resulting in immaterial adjustments to held reserves. During 2010 the Company monitored asbestos and environmental activity to determine whether or not any adjustment to reserves is warranted. Based on this review of actual emerged losses, no material adjustments were made.

Effect of Uncertainty in Reserving For Asbestos and Environmental Claims on Company's Financial Condition

The methods of determining estimates for reported and unreported losses and establishing resulting reserves and related reinsurance recoverables are periodically reviewed and updated, and adjustments resulting from this review are reflected in income currently.

The table below summarizes reserve and loss activity for the Company's asbestos and environmental loss and loss adjustment expenses for each of the five most recent calendar years. Gross reserves for both asbestos and environmental are representative of the companies included in Note 26. Net reserves for asbestos and environmental are allocated based on the Company's Inter-company Reinsurance Agreement, as discussed in Note 26.

Asbestos:

| | <u>2006</u> | <u>2007</u> | <u>2008</u> | <u>2009</u> | <u>2010</u> |
|---------------------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| Direct Basis | | | | | |
| Beginning Reserves | 13,645,061 | 15,776,234 | 14,883,165 | 15,399,176 | 14,407,212 |
| Incurring losses and LAE | 3,246,245 | 861,685 | 2,269,209 | 196,666 | (1,193) |
| Calendar year payments | 1,115,071 | 1,570,752 | 1,753,198 | 1,188,630 | 1,441,365 |
| Ending Reserves | <u>15,776,235</u> | <u>15,067,167</u> | <u>15,399,176</u> | <u>14,407,212</u> | <u>12,964,654</u> |
| Assumed Reinsurance Basis | | | | | |
| Beginning Reserves | 10,044,014 | 9,907,753 | 12,236,513 | 10,474,367 | 14,591,949 |
| Incurring losses and LAE | 433,978 | 2,819,373 | (415,782) | 5,177,706 | (5,131) |
| Calendar year payments | 570,239 | 949,222 | 1,346,364 | 1,060,124 | 1,855,017 |
| Ending Reserves | <u>9,907,753</u> | <u>11,777,904</u> | <u>10,474,367</u> | <u>14,591,949</u> | <u>12,731,801</u> |
| Net of Ceded Reinsurance Basis | | | | | |
| Beginning Reserves | 19,507,475 | 20,748,129 | 21,974,828 | 21,080,626 | 24,822,188 |
| Incurring losses and LAE | 2,771,398 | 3,044,000 | 1,107,884 | 5,845,956 | 11,682 |
| Calendar year payments | 1,530,745 | 2,098,093 | 2,002,086 | 2,104,394 | 3,000,488 |
| Ending Reserves | <u>20,748,128</u> | <u>21,694,036</u> | <u>21,080,626</u> | <u>24,822,188</u> | <u>21,833,382</u> |

Ending Reserves for Bulk + IBNR included above (Loss & LAE)

| | |
|--------------------------------|------------|
| Direct Basis | 7,790,715 |
| Assumed Reinsurance Basis | 7,251,671 |
| Net of Ceded Reinsurance Basis | 13,973,584 |

Ending Reserves for LAE included above (Case, Bulk & IBNR)

| | |
|--------------------------------|-----------|
| Direct Basis | 4,109,608 |
| Assumed Reinsurance Basis | 67,800 |
| Net of Ceded Reinsurance Basis | 3,409,567 |

Environmental:

| | <u>2006</u> | <u>2007</u> | <u>2008</u> | <u>2009</u> | <u>2010</u> |
|--------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| Direct Basis | | | | | |
| Beginning Reserves | 18,466,530 | 17,991,416 | 17,105,887 | 14,613,911 | 12,448,627 |
| Incurring losses and LAE | 1,698,850 | 4,733,484 | 376,637 | (634,355) | (66,579) |
| Calendar year payments | 2,173,965 | 3,420,639 | 2,868,613 | 1,530,929 | 1,239,152 |
| Ending Reserves | <u>17,991,415</u> | <u>19,304,261</u> | <u>14,613,911</u> | <u>12,448,627</u> | <u>11,142,896</u> |

NOTES TO FINANCIAL STATEMENTS

Assumed Reinsurance Basis

| | | | | | |
|------------------------|------------------|------------------|------------------|------------------|------------------|
| Beginning Reserves | 3,743,306 | 3,379,138 | 3,284,348 | 3,158,132 | 2,273,299 |
| Inurred losses and LAE | 74,463 | 49,357 | 185 | (804,884) | 41,844 |
| Calendar year payments | 438,631 | 86,168 | 126,401 | 79,950 | 234,893 |
| Ending Reserves | <u>3,379,138</u> | <u>3,342,327</u> | <u>3,158,132</u> | <u>2,273,298</u> | <u>2,080,250</u> |

Net of Ceded Reinsurance Basis

| | | | | | |
|------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| Beginning Reserves | 20,211,693 | 18,819,692 | 18,818,738 | 16,049,789 | 12,839,497 |
| Inurred losses and LAE | 1,008,433 | 5,222,653 | (331,366) | (1,696,036) | 7,154 |
| Calendar year payments | 2,400,434 | 2,902,564 | 2,437,583 | 1,514,256 | 1,413,637 |
| Ending Reserves | <u>18,819,692</u> | <u>21,139,781</u> | <u>16,049,789</u> | <u>12,839,497</u> | <u>11,433,014</u> |

Ending Reserves for Bulk + IBNR included above (Loss & LAE)

| | |
|--------------------------------|-----------|
| Direct Basis | 6,502,105 |
| Assumed Reinsurance Basis | 1,284,002 |
| Net of Ceded Reinsurance Basis | 6,529,278 |

Ending Reserves for LAE included above (Case, Bulk & IBNR)

| | |
|--------------------------------|-----------|
| Direct Basis | 2,714,642 |
| Assumed Reinsurance Basis | 10,252 |
| Net of Ceded Reinsurance Basis | 2,549,523 |

Upon entering the PIC Pool, effective January 1, 2008 (refer to Note 26), the Ohio Casualty Companies' asbestos and environmental claims coding was revised to reflect the definition employed by the Peerless "Pool", which is consistent with industry practice. As a result, the 2007 ending balances for asbestos and environmental reserves, which is the sum of the former PIC Pool's amounts and the Ohio Casualty Companies' Pool amounts, differ from the 2008 beginning balances, which reflect a single common definition.

Note 34 - Subscriber Savings Accounts

The Company is not a reciprocal insurance company.

Note 35 - Multiple Peril Crop Insurance

Not applicable

Note 36 - Financial Guarantee Insurance

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
- 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? _____ Washington _____
- 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. _____ 12/31/2009 _____
- 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. _____ 12/31/2005 _____
- 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). _____ 06/12/2007 _____
- 3.4 By what department or departments?
 Washington State Office of the Insurance Commissioner

- 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
- 5.2 If yes, provide the name of the 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 Name of Entity | 2 NAIC Company Code | 3 State of Domicile |
|---------------------|------------------------|------------------------|
| | 00000 | |
| | 00000 | |
| | 00000 | |

- 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

GENERAL INTERROGATORIES

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 [X]

7.2 If yes,

- 7.21 State the percentage of foreign control. _____ %
- 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 Nationality | 2 Type of Entity |
|------------------|---------------------|
| | |

8.1 Is the company a subsidiary of a bank holding company regulated by the Federal Reserve Board? Yes [] No [X]

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 [X]

8.4 If response to 8.3 is yes, please provide 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 Office of Thrift Supervision (OTS), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

| 1 Affiliate Name | 2 Location (City, State) | 3 FRB | 4 OCC | 5 OTS | 6 FDIC | 7 SEC |
|------------------------|--------------------------------|----------|----------|----------|-----------|----------|
| | | | | | | |

9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?

Ernst & Young, LLP
 200 Clarendon Street
 Boston, MA 02116

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 [X]

10.2 If response to 10.1 is "yes," provide information related to this exemption:

.....

10.3 Has the insurer been granted any exemptions to the audit committee requirements as allowed in Section 14H of the Annual Financial Reporting Model Regulation, or substantially similar state law or regulation? Yes [] No [X]

10.4 If response to 10.3 is "yes," provide information related to this exemption:

.....

GENERAL INTERROGATORIES

10.5 Has the insurer been granted any exemptions related to the other requirements of the Annual Financial Reporting Model Regulation as allowed in Section 17A of the Model Regulation, or substantially similar state law or regulation? Yes [] No [X]

10.6 If response to 10.5 is "yes," provide information related to this exemption:

10.7 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance law? Yes [X] No [] N/A []

10.8 If the response to 10.7 is no or n/a, please explain:

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?
 Thomas E. Schadler, FCAS, MAAA
 175 Berkeley Street Boston, MA 02116
 Sr. Vice President & Chief Actuary of Liberty Mutual Agency Corporation

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:

13. 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 [X]

13.3 Have there been any changes made to any of the trust indentures during the year? Yes [] No [X]

13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? Yes [] No [] N/A [X]

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?
 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. Yes [X] No []

14.11 If the response to 14.1 is no, please explain:

GENERAL INTERROGATORIES

- 14.2 Has the code of ethics for senior managers been amended? Yes No
- 14.21 If the response to 14.2 is yes, provide information related to amendment(s).
 During the 1st quarter, Liberty Mutual Group published several non-material changes to its Code of Business Ethics and Conduct designed to clarify existing Code provisions.

- 14.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes No
- 14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).

BOARD OF DIRECTORS

15. Is the purchase or sale of all investments of the reporting entity passed upon either by the board of directors or a subordinate committee thereof? Yes No
16. Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof? Yes No
17. 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 No

FINANCIAL

18. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? Yes No
- 19.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):
- | | | | |
|--|---|----|---|
| | 19.11 To directors or other officers | \$ | 0 |
| | 19.12 To stockholders not officers | \$ | 0 |
| | 19.13 Trustees, supreme or grand (Fraternal only) | \$ | 0 |
- 19.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):
- | | | | |
|--|---|----|---|
| | 19.21 To directors or other officers | \$ | 0 |
| | 19.22 To stockholders not officers | \$ | 0 |
| | 19.23 Trustees, supreme or grand (Fraternal only) | \$ | 0 |
- 20.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reported in the statement? Yes No
- 20.2 If yes, state the amount thereof at December 31 of the current year:
- | | | | |
|--|----------------------------|----|---|
| | 20.21 Rented from others | \$ | 0 |
| | 20.22 Borrowed from others | \$ | 0 |
| | 20.23 Leased from others | \$ | 0 |
| | 20.24 Other | \$ | 0 |
- 21.1 Does this statement include payments for assessments as described in the Annual Statement Instructions other than guaranty fund or guaranty association assessments? Yes No
- 21.2 If answer is yes:
- | | | | |
|--|--|----|---|
| | 21.21 Amount paid as losses or risk adjustment | \$ | 0 |
| | 21.22 Amount paid as expenses | \$ | 0 |
| | 21.23 Other amounts paid | \$ | 0 |
- 22.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes No
- 22.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ 0

GENERAL INTERROGATORIES

INVESTMENT

- 23.1 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 23.3) Yes No
- 23.2 If no, give full and complete information relating thereto:

- 23.3 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)
 Please reference Note 17B

- 23.4 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
- 23.5 If answer to 23.4 is yes, report amount of collateral for conforming programs. \$ 9,727,485
- 23.6 If answer to 23.4 is no, report amount of collateral for other programs. \$ 0
- 23.7 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
- 23.8 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? Yes No N/A
- 23.9 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities lending Agreement (MLSA) to conduct securities lending? Yes No N/A
- 24.1 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 currently in force? (Exclude securities subject to Interrogatory 20.1 and 23.3) Yes No
- 24.2 If yes, state the amount thereof at December 31 of the current year:
- | | | | |
|--|-------|--|----------------------|
| | 24.21 | Subject to repurchase agreements | \$ <u>0</u> |
| | 24.22 | Subject to reverse repurchase agreements | \$ <u>0</u> |
| | 24.23 | Subject to dollar repurchase agreements | \$ <u>0</u> |
| | 24.24 | Subject to reverse dollar repurchase agreements | \$ <u>0</u> |
| | 24.25 | Pledged as collateral | \$ <u>0</u> |
| | 24.26 | Placed under option agreements | \$ <u>0</u> |
| | 24.27 | Letter stock or securities restricted as to sale | \$ <u>0</u> |
| | 24.28 | On deposit with state or other regulatory body | \$ <u>80,334,833</u> |
| | 24.29 | Other | \$ <u>0</u> |
- 24.3 For category (24.27) provide the following:
- | 1
Nature of Restriction | 2
Description | 3
Amount |
|----------------------------|------------------|-------------|
| | | 0 |
| | | 0 |
| | | 0 |
- 25.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes No
- 25.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? If no, attach a description with this statement. Yes No N/A
- 26.1 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
- 26.2 If yes, state the amount thereof at December 31 of the current year. \$ 0

GENERAL INTERROGATORIES

27. 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 No

27.01 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 |
|---------------------------|---|
| JP Morgan Chase | 1 Chase Manhattan Plaza, New York, NY 10005 |
| Bank of New York Mellon | 601 Travis Street, Houston, TX 77002 |

27.02 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) |
|--------------|------------------|------------------------------|
| | | |
| | | |

27.03 Have there been any changes, including name changes, in the custodian(s) identified in 27.01 during the current year?

Yes No

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

| 1 Old Custodian | 2 New Custodian | 3 Date of Change | 4 Reason |
|--------------------|-------------------------|---------------------|-------------------------------|
| N/A | Bank of New York Mellon | 03/01/2010 | Custodian for new asset types |
| | | | |

27.05 Identify all investment advisors, broker/dealers or individuals acting on behalf of broker/dealers that have access to the investment accounts, handle securities and have authority to make investments on behalf of the reporting entity:

| 1 Central Registration Depository Number(s) | 2 Name(s) | 3 Address |
|--|---|--|
| N/A | Liberty Mutual Investment Advisors, LLC | 175 Berkeley Street, Boston, MA 02116 |
| N/A | Liberty Mutual Group Inc. | 175 Berkeley Street, Boston, MA 02116 |
| N/A | Stancorp Mortgage Investors | 1100 SW Sixth Avenue, Portland, OR 97204 |

28.1 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

28.2 If yes, complete the following schedule:

| 1 CUSIP # | 2 Name of Mutual Fund | 3 Book/Adjusted Carrying Value |
|---------------|--------------------------|-----------------------------------|
| | | 0 |
| | | 0 |
| | | 0 |
| 28.2999 TOTAL | | 0 |

28.3 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 |
|--|--|---|------------------------|
| | | 0 | |
| | | 0 | |
| | | 0 | |

GENERAL INTERROGATORIES

29. 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 (+) |
|-----------------------|------------------------------------|-----------------|---|
| 29.1 Bonds | 1,539,658,284 | 1,530,927,672 | 8,730,612 |
| 29.2 Preferred stocks | 13,754,650 | 13,754,650 | 0 |
| 29.3 Totals | 1,553,412,934 | 1,544,682,322 | 8,730,612 |

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

The primary source is published unit prices from the NAIC Securities Valuation Office. The secondary source is the pricing vendor, Interactive Data Corporation, followed by backfill from Bloomberg and Markit. Lastly, management determines fair value based on quoted market prices of similar financial instruments or by using industry recognized valuation techniques.

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

30.2 If the answer to 30.1 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

30.3 If the answer to 30.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:

The Company reviews the pricing methodology of its vendors on an annual basis. The company has also established acceptable price change and tolerance guidelines. Vendor prices falling outside the guidelines are further reviewed by management on a monthly basis. All prices determined internally by the insurer are reviewed and signed off by the Chief Investment Officer.

31.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Securities Valuation Office been followed? Yes No

31.2 If no, list exceptions:

OTHER

32.1 Amount of payments to Trade associations, service organizations and statistical or Rating Bureaus, if any? \$ 0

32.2 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 |
|-----------|------------------|
| | 0 |
| | 0 |
| | 0 |

33.1 Amount of payments for legal expenses, if any? \$ 314,146

33.2 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 |
|-----------|------------------|
| | 0 |
| | 0 |
| | 0 |

34.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? \$ 22,446

GENERAL INTERROGATORIES

34.2 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 |
|-----------|------------------|
| | 0 |
| | 0 |
| | 0 |

GENERAL INTERROGATORIES

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

| | | | |
|------|--|-------------------------|--|
| 1.1 | Does the reporting entity have any direct Medicare Supplement Insurance in force? | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 1.2 | If yes, indicate premium earned on U.S. business only. | | \$ <u>0</u> |
| 1.3 | What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit? | | \$ <u>0</u> |
| 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. | | \$ <u>0</u> |
| 1.5 | Indicate total incurred claims on all Medicare Supplement insurance. | | \$ <u>0</u> |
| 1.6 | Individual policies: | | |
| | Most current three years: | | |
| 1.61 | Total premium earned | | \$ <u>0</u> |
| 1.62 | Total incurred claims | | \$ <u>0</u> |
| 1.63 | Number of covered lives | | <u>0</u> |
| | All years prior to most current three years: | | |
| 1.64 | Total premium earned | | \$ <u>0</u> |
| 1.65 | Total incurred claims | | \$ <u>0</u> |
| 1.66 | Number of covered lives | | <u>0</u> |
| 1.7 | Group policies: | | |
| | Most current three years: | | |
| 1.71 | Total premium earned | | \$ <u>0</u> |
| 1.72 | Total incurred claims | | \$ <u>0</u> |
| 1.73 | Number of covered lives | | <u>0</u> |
| | All years prior to most current three years: | | |
| 1.74 | Total premium earned | | \$ <u>0</u> |
| 1.75 | Total incurred claims | | \$ <u>0</u> |
| 1.76 | Number of covered lives | | <u>0</u> |
| 2. | Health Test: | | |
| | | 1 | 2 |
| | | Current Year | Prior Year |
| 2.1 | Premium Numerator | \$ <u>0</u> | \$ <u>653,182</u> |
| 2.2 | Premium Denominator | \$ <u>948,904,559</u> | \$ <u>963,840,745</u> |
| 2.3 | Premium Ratio (2.1/2.2) | <u>0.00</u> | <u>0.00</u> |
| 2.4 | Reserve Numerator | \$ <u>4,636,361</u> | \$ <u>715,273</u> |
| 2.5 | Reserve Denominator | \$ <u>1,451,472,979</u> | \$ <u>1,549,786,794</u> |
| 2.6 | Reserve Ratio (2.4/2.5) | <u>0.00</u> | <u>0.00</u> |
| 3.1 | Does the reporting entity issue both participating and non-participating policies? | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 3.2 | If yes, state the amount of calendar year premiums written on: | | |
| 3.21 | Participating policies | | \$ <u>0</u> |
| 3.22 | Non-participating policies | | \$ <u>0</u> |
| 4. | For Mutual reporting entities and Reciprocal Exchanges only: | | |
| 4.1 | Does the reporting entity issue assessable policies? | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 4.2 | Does the reporting entity issue non-assessable policies? | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 4.3 | If assessable policies are issued, what is the extent of the contingent liability of the policyholders? | | <u>0</u> |
| 4.4 | Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums. | | \$ <u>0</u> |
| 5. | For Reciprocal Exchanges Only: | | |
| 5.1 | Does the exchange appoint local agents? | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 5.2 | If yes, is the commission paid: | | |
| 5.21 | Out of Attorney's-in-fact compensation | | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 5.22 | As a direct expense of the exchange | | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| 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 loss: See Note 21C | | |
| | | | |
| | | | |

GENERAL INTERROGATORIES

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

- 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:
 The Company employs industry recognized catastrophe modeling software to estimate the Probable Maximum Loss. For property exposures, we employ RiskLink v10.0 from RMS and AIR Classic/2 v12.0. For workers' compensation, Liberty Mutual utilizes RiskLink v10.0 from RMS.

.....

.....
- 6.3 What provision has this reporting entity made (such as a 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?
 See Note 21C

.....

.....
- 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 [X] No []
- 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 uninsured catastrophic loss

.....

.....
- 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]
- 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 32 of SSAP No. 62R, Property and Casualty Reinsurance, 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, Yes [] No [X]
 - (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 Yes [] No [X]
 - (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 [X] No []

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

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

11.1 Has the reporting entity guaranteed policies issued by any other entity and now in force: Yes No

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 asset schedule, Page 2, state the amount of corresponding liabilities recorded for:

| | |
|---|---------------------|
| 12.11 Unpaid losses | \$ <u>3,787,758</u> |
| 12.12 Unpaid underwriting expenses (including loss adjustment expenses) | \$ <u>473,557</u> |

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? \$ 110,400

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 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 | <u>0.00</u> |
| 12.42 To | <u>9.00</u> |

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 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

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

| | |
|----------------------------------|----------------------|
| 12.61 Letters of Credit | \$ <u>77,068,391</u> |
| 12.62 Collateral and other funds | \$ <u>22,768,503</u> |

13.1 Largest net aggregate amount insured in any one risk (excluding workers' compensation): \$ 33,106,200

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

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. 1

14.1 Is the company a cedant in a multiple cedant reinsurance contract? Yes No

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

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

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

15.2 If yes, give full information

16.1 Does the reporting entity write any warranty business? Yes No
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 | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> |
| 16.12 Products | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> |
| 16.13 Automobile | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> |
| 16.14 Other* | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> | \$ <u>0</u> |

* Disclose type of coverage: _____

GENERAL INTERROGATORIES

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

17.1 Does the reporting entity include amounts recoverable on unauthorized reinsurance in Schedule F – Part 3 that it excludes from Schedule F – Part 5.

Yes [] No [X]

Incurred but not reported losses on contracts in force prior to July 1, 1984, and not subsequently renewed are exempt from inclusion in Schedule F – Part 5. Provide the following information for this exemption:

| | |
|--|-----------------------|
| 17.11 Gross amount of unauthorized reinsurance in Schedule F – Part 3 excluded from Schedule F – Part 5 | \$ <u> 0</u> |
| 17.12 Unfunded portion of Interrogatory 17.11 | \$ <u> 0</u> |
| 17.13 Paid losses and loss adjustment expenses portion of Interrogatory 17.11 | \$ <u> 0</u> |
| 17.14 Case reserves portion of Interrogatory 17.11 | \$ <u> 0</u> |
| 17.15 Incurred but not reported portion of Interrogatory 17.11 | \$ <u> 0</u> |
| 17.16 Unearned premium portion of Interrogatory 17.11 | \$ <u> 0</u> |
| 17.17 Contingent commission portion of Interrogatory 17.11 | \$ <u> 0</u> |

Provide the following information for all other amounts included in Schedule F – Part 3 and excluded from Schedule F – Part 5, not included above.

| | |
|--|-----------------------|
| 17.18 Gross amount of unauthorized reinsurance in Schedule F – Part 3 excluded from Schedule F – Part 5 | \$ <u> 0</u> |
| 17.19 Unfunded portion of Interrogatory 17.18 | \$ <u> 0</u> |
| 17.20 Paid losses and loss adjustment expenses portion of Interrogatory 17.18 | \$ <u> 0</u> |
| 17.21 Case reserves portion of Interrogatory 17.18 | \$ <u> 0</u> |
| 17.22 Incurred but not reported portion of Interrogatory 17.18 | \$ <u> 0</u> |
| 17.23 Unearned premium portion of Interrogatory 17.18 | \$ <u> 0</u> |
| 17.24 Contingent commission portion of Interrogatory 17.18 | \$ <u> 0</u> |

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

FIVE – YEAR HISTORICAL DATA

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

| | 1 | 2 | 3 | 4 | 5 |
|---|---------------|---------------|---------------|---------------|---------------|
| | 2010 | 2009 | 2008 | 2007 | 2006 |
| Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 & 3) | | | | | |
| 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) | 548,260,874 | 579,391,011 | 773,491,159 | 843,478,819 | 864,503,788 |
| 2. Property lines (Lines 1, 2, 9, 12, 21 & 26) | 255,427,801 | 215,277,207 | 508,013,126 | 601,552,546 | 584,301,284 |
| 3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27) | 379,987,972 | 356,423,054 | 379,131,460 | 423,512,058 | 417,469,168 |
| 4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34) | 69,971,572 | 53,652,971 | 109,872,047 | 95,307,263 | 81,392,216 |
| 5. Nonproportional reinsurance lines (Lines 31, 32 & 33) | | 10 | 2,455 | 254 | 322 |
| 6. Total (Line 35) | 1,253,648,219 | 1,204,744,253 | 1,770,510,247 | 1,963,850,940 | 1,947,666,778 |
| Net Premiums Written (Page 8, Part 1B, Col. 6) | | | | | |
| 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) | 395,668,789 | 433,042,214 | 511,916,829 | 555,931,468 | 558,699,927 |
| 8. Property lines (Lines 1, 2, 9, 12, 21 & 26) | 190,222,541 | 158,506,060 | 310,584,442 | 322,922,816 | 332,769,041 |
| 9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27) | 316,839,625 | 288,257,482 | 302,198,913 | 332,346,864 | 324,307,115 |
| 10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34) | 67,210,349 | 51,218,974 | 103,716,469 | 89,711,882 | 75,396,760 |
| 11. Nonproportional reinsurance lines (Lines 31, 32 & 33) | | 10 | 2,455 | 254 | 322 |
| 12. Total (Line 35) | 969,941,304 | 931,024,740 | 1,228,419,108 | 1,300,913,284 | 1,291,173,165 |
| Statement of Income (Page 4) | | | | | |
| 13. Net underwriting gain (loss) (Line 8) | (13,636,054) | 40,479,716 | 33,878,242 | 83,535,267 | 149,543,577 |
| 14. Net investment gain (loss) (Line 11) | 83,208,127 | 80,476,846 | 60,157,872 | 124,565,428 | 139,892,810 |
| 15. Total other income (Line 15) | (7,504,158) | (1,625,861) | 2,066,492 | 4,083,469 | (1,258,464) |
| 16. Dividends to policyholders (Line 17) | (324,233) | 4,123,899 | 1,528,468 | 1,091,252 | 1,527,200 |
| 17. Federal and foreign income taxes incurred (Line 19) | (2,905,339) | 27,483,031 | 20,532,444 | 42,250,530 | 60,753,595 |
| 18. Net income (Line 20) | 65,297,487 | 87,723,771 | 74,041,694 | 168,842,382 | 225,897,128 |
| Balance Sheet Lines (Pages 2 and 3) | | | | | |
| 19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3) | 2,079,615,242 | 2,260,231,867 | 2,302,042,774 | 2,432,373,782 | 2,702,742,949 |
| 20. Premiums and considerations (Page 2, Col. 3) | | | | | |
| 20.1 In course of collection (Line 15.1) | 33,025,969 | 36,449,767 | 114,460,712 | 156,705,443 | 141,533,937 |
| 20.2 Deferred and not yet due (Line 15.2) | 265,612,010 | 258,811,213 | 192,480,558 | 170,011,887 | 189,068,306 |
| 20.3 Accrued retrospective premiums (Line 15.3) | 842,799 | 1,502,332 | 537,089 | 468,585 | 555,040 |
| 21. Total liabilities excluding protected cell business (Page 3, Line 26) | 1,670,004,095 | 1,712,233,782 | 1,854,423,971 | 1,838,026,406 | 1,826,146,338 |
| 22. Losses (Page 3, Line 1) | 821,610,206 | 864,827,432 | 891,773,290 | 878,701,037 | 867,930,439 |
| 23. Loss adjustment expenses (Page 3, Line 3) | 183,372,265 | 205,900,191 | 207,882,820 | 209,208,686 | 221,600,829 |
| 24. Unearned premiums (Page 3, Line 9) | 446,490,508 | 423,304,339 | 464,642,504 | 507,766,123 | 492,678,051 |
| 25. Capital paid up (Page 3, Lines 30 & 31) | 5,000,000 | 5,000,000 | 5,000,000 | 5,000,000 | 5,000,000 |
| 26. Surplus as regards policyholders (Page 3, Line 37) | 409,611,147 | 547,998,085 | 447,618,803 | 594,347,376 | 876,596,611 |
| Cash Flow (Page 5) | | | | | |
| 27. Net cash from operations (Line 11) | (12,372,452) | (52,997,703) | 95,069,666 | 149,637,541 | 176,130,672 |
| Risk-Based Capital Analysis | | | | | |
| 28. Total adjusted capital | 409,611,147 | 547,998,085 | 447,618,803 | 594,347,376 | 876,596,611 |
| 29. Authorized control level risk-based capital | 86,611,961 | 89,691,682 | 105,596,083 | 113,439,557 | 113,069,635 |
| Percentage Distribution of Cash, Cash Equivalents and Invested Assets (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0 | | | | | |
| 30. Bonds (Line 1) | 90.1 | 91.6 | 85.3 | 81.5 | 85.0 |
| 31. Stocks (Lines 2.1 & 2.2) | 4.4 | 2.0 | 2.6 | 17.2 | 15.0 |
| 32. Mortgage loans on real estate (Lines 3.1 and 3.2) | 2.4 | 0.8 | | | |
| 33. Real estate (Lines 4.1, 4.2 & 4.3) | | | | | |
| 34. Cash, cash equivalents and short-term investments (Line 5) | 2.4 | 5.6 | 11.7 | 1.3 | 0.0 |
| 35. Contract loans (Line 6) | | | | | |
| 36. Derivatives (Line 7) | | X X X | X X X | X X X | X X X |
| 37. Other invested assets (Line 8) | 0.0 | | | 0.0 | 0.0 |
| 38. Receivables for securities (Line 9) | 0.0 | | 0.3 | 0.0 | 0.0 |
| 39. Securities lending reinvested collateral assets (Line 10) | 0.6 | X X X | X X X | X X X | X X X |
| 40. Aggregate write-ins for invested assets (Line 11) | | | | | |
| 41. Cash, cash equivalents and invested assets (Line 12) | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| Investments in Parent, Subsidiaries and Affiliates | | | | | |
| 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) | 13,764,548 | 13,461,491 | 13,017,640 | 12,570,000 | 12,203,000 |
| 45. Affiliated short-term investments (subtotals included in Schedule DA Verification, Col. 5, Line 10) | | | | | |
| 46. Affiliated mortgage loans on real estate | | | | | |
| 47. All other affiliated | | | | | |
| 48. Total of above Lines 42 to 47 | 13,764,548 | 13,461,491 | 13,017,640 | 12,570,000 | 12,203,000 |
| 49. 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) | 3.4 | 2.5 | 2.9 | 2.1 | 1.4 |

FIVE – YEAR HISTORICAL DATA

(Continued)

| | 1 | 2 | 3 | 4 | 5 |
|--|---------------|-------------|---------------|---------------|---------------|
| | 2010 | 2009 | 2008 | 2007 | 2006 |
| Capital and Surplus Accounts (Page 4) | | | | | |
| 50. Net unrealized capital gains (losses) (Line 24) | 2,055,218 | 5,665,895 | (63,901,178) | (24,712,419) | 14,100,953 |
| 51. Dividends to stockholders (Line 35) | (206,000,000) | | (123,000,000) | (425,000,000) | (170,000,000) |
| 52. Change in surplus as regards policyholders for the year (Line 38) | (138,386,938) | 100,379,282 | (146,728,573) | (282,249,235) | 62,335,853 |
| Gross Losses Paid (Page 9, Part 2, Cols. 1 & 2) | | | | | |
| 53. 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) | 388,958,632 | 362,597,376 | 496,946,725 | 548,819,203 | 481,397,364 |
| 54. Property lines (Lines 1, 2, 9, 12, 21 & 26) | 136,445,301 | 169,484,882 | 273,704,542 | 295,269,063 | 317,398,430 |
| 55. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27) | 205,900,092 | 186,666,067 | 255,007,682 | 190,089,390 | 172,968,513 |
| 56. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34) | 13,634,990 | 6,476,901 | 5,400,655 | (737,546) | 3,593,591 |
| 57. Nonproportional reinsurance lines (Lines 31, 32 & 33) | 1,969,810 | 41,628,040 | 5,925,868 | 4,105,764 | 775,724 |
| 58. Total (Line 35) | 746,908,825 | 766,853,266 | 1,036,985,472 | 1,037,545,874 | 976,133,622 |
| Net Losses Paid (Page 9, Part 2, Col. 4) | | | | | |
| 59. 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) | 293,289,908 | 228,227,063 | 293,734,129 | 336,461,323 | 306,527,933 |
| 60. Property lines (Lines 1, 2, 9, 12, 21 & 26) | 97,477,450 | 109,317,858 | 176,639,184 | 179,099,810 | 187,491,828 |
| 61. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27) | 168,861,089 | 142,776,221 | 201,239,486 | 154,451,706 | 147,300,125 |
| 62. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34) | 13,299,628 | 7,016,330 | 5,246,594 | (720,454) | 5,989,922 |
| 63. Nonproportional reinsurance lines (Lines 31, 32 & 33) | 1,969,810 | 28,421,541 | 4,859,322 | 3,192,809 | (115,951) |
| 64. Total (Line 35) | 574,897,885 | 515,759,013 | 681,718,715 | 672,485,194 | 647,193,857 |
| Operating Percentages (Page 4) (Item divided by Page 4, Line 1) x 100.0 | | | | | |
| 65. Premiums earned (Line 1) | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |
| 66. Losses incurred (Line 2) | 56.0 | 50.7 | 55.5 | 53.1 | 47.1 |
| 67. Loss expenses incurred (Line 3) | 11.8 | 11.9 | 11.5 | 9.7 | 11.4 |
| 68. Other underwriting expenses incurred (Line 4) | 33.6 | 33.2 | 30.3 | 30.7 | 30.0 |
| 69. Net underwriting gain (loss) (Line 8) | (1.4) | 4.2 | 2.7 | 6.5 | 11.6 |
| Other Percentages | | | | | |
| 70. 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) | 33.6 | 34.6 | 31.2 | 30.0 | 30.1 |
| 71. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0) | 67.8 | 62.6 | 67.0 | 62.9 | 58.5 |
| 72. 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) | 236.8 | 169.9 | 274.4 | 218.9 | 147.3 |
| One Year Loss Development (000 omitted) | | | | | |
| 73. Development in estimated losses and loss expenses incurred prior to current year (Schedule P, Part 2-Summary, Line 12, Col. 11) | (11,150) | (70,964) | (35,823) | (33,792) | (32,081) |
| 74. Percent of development of losses and loss expenses incurred to policyholders' surplus of prior year end (Line 73 above divided by Page 4, Line 21, Col. 1 x 100.0) | (2.0) | (15.9) | (6.0) | (3.9) | (3.9) |
| Two Year Loss Development (000 omitted) | | | | | |
| 75. 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) | (56,711) | (102,257) | (51,404) | (70,869) | (29,394) |
| 76. Percent of development of losses and loss expenses incurred to reported policyholders' surplus of second prior year end (Line 75 above divided by Page 4, Line 21, Col. 2 x 100.0) | (12.7) | (17.2) | (5.9) | (8.7) | (4.1) |

NOTE: 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 [X]

If no, please explain:

Not applicable

SCHEDULE P – ANALYSIS OF LOSSES AND LOSS EXPENSES

SCHEDULE P – PART 1 – SUMMARY

(\$000 omitted)

| Years in Which Premiums Were Earned and Losses Were Incurred | Premiums Earned | | | Loss and Loss Expense Payments | | | | | | | | 12 Number of Claims Reported - Direct and Assumed |
|--|-------------------------|------------|----------------------|--------------------------------|---------|---------------------------------------|--------|------------------------------|--------|--|--|--|
| | 1 Direct and Assumed | 2 Ceded | 3 Net (Cols. 1–2) | Loss Payments | | Defense and Cost Containment Payments | | Adjusting and Other Payments | | 10 Salvage and Subrogation Received | 11 Total Net Paid (Cols. 4 - 5 + 6 - 7 + 8 - 9) | |
| | | | | 4 | 5 | 6 | 7 | 8 | 9 | | | |
| | | | | Direct and Assumed | Ceded | Direct and Assumed | Ceded | Direct and Assumed | Ceded | | | |
| 1. Prior | X X X | X X X | X X X | 12,734 | 1,282 | 3,526 | 101 | 773 | 117 | 311 | 15,533 | X X X |
| 2. 2001 | 771,349 | 47,891 | 723,458 | 493,932 | 34,535 | 36,470 | 1,959 | 60,425 | 1,911 | 27,378 | 552,422 | X X X |
| 3. 2002 | 838,748 | 82,456 | 756,292 | 461,134 | 45,630 | 34,528 | 3,175 | 59,305 | 2,912 | 27,190 | 503,250 | X X X |
| 4. 2003 | 915,697 | 76,479 | 839,218 | 446,168 | 38,452 | 30,992 | 2,254 | 66,984 | 3,069 | 27,609 | 500,369 | X X X |
| 5. 2004 | 985,440 | 54,370 | 931,070 | 457,248 | 18,346 | 28,190 | 1,019 | 65,701 | 1,371 | 34,580 | 530,403 | X X X |
| 6. 2005 | 1,026,606 | 41,581 | 985,025 | 465,535 | 18,454 | 29,048 | 1,093 | 68,847 | 1,005 | 32,690 | 542,878 | X X X |
| 7. 2006 | 1,025,245 | 45,788 | 979,457 | 460,216 | 10,387 | 26,904 | 1,285 | 69,137 | 1,483 | 27,898 | 543,102 | X X X |
| 8. 2007 | 1,046,436 | 51,106 | 995,330 | 455,607 | 9,990 | 23,609 | 1,075 | 68,265 | 917 | 28,720 | 535,499 | X X X |
| 9. 2008 | 1,044,379 | 38,828 | 1,005,551 | 486,211 | 14,583 | 19,033 | 899 | 75,037 | 697 | 25,400 | 564,102 | X X X |
| 10. 2009 | 979,856 | 61,280 | 918,576 | 367,868 | 25,347 | 10,059 | 1,157 | 64,231 | 443 | 21,770 | 415,211 | X X X |
| 11. 2010 | 968,488 | 19,584 | 948,904 | 263,821 | 1,278 | 3,839 | 77 | 59,716 | 60 | 13,303 | 325,961 | X X X |
| 12. Totals | X X X | X X X | X X X | 4,370,474 | 218,284 | 246,198 | 14,094 | 658,421 | 13,985 | 266,849 | 5,028,730 | X X X |

| | Losses Unpaid | | | | Defense and Cost Containment Unpaid | | | | Adjusting and Other Unpaid | | 23 Salvage and Subrogation Anticipated | 24 Total Net Losses and Expenses Unpaid | 25 Number of Claims Outstanding Direct and Assumed |
|------------|--------------------|--------|--------------------|--------|-------------------------------------|-------|--------------------|-------|----------------------------|-------|---|--|---|
| | Case Basis | | Bulk + IBNR | | Case Basis | | Bulk + IBNR | | Other Unpaid | | | | |
| | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | | | |
| | Direct and Assumed | Ceded | Direct and Assumed | Ceded | Direct and Assumed | Ceded | Direct and Assumed | Ceded | Direct and Assumed | Ceded | | | |
| 1. Prior | 109,591 | 38,855 | 65,132 | 7,890 | 3,950 | 879 | 12,634 | 1,477 | 10,127 | 225 | 3,447 | 152,108 | X X X |
| 2. 2001 | 10,505 | 1,815 | 3,005 | 777 | 180 | 10 | 1,320 | 128 | 778 | 22 | 478 | 13,036 | X X X |
| 3. 2002 | 12,251 | 2,268 | 3,171 | 638 | 262 | 21 | 1,323 | 107 | 831 | 18 | 510 | 14,786 | X X X |
| 4. 2003 | 9,669 | 2,080 | 4,222 | 544 | 277 | 2 | 1,955 | 100 | 976 | 14 | 612 | 14,359 | X X X |
| 5. 2004 | 11,599 | 2,470 | 6,682 | 698 | 280 | 1 | 2,156 | 117 | 1,046 | 20 | 1,725 | 18,457 | X X X |
| 6. 2005 | 15,397 | 1,337 | 8,310 | 943 | 505 | 1 | 3,722 | 179 | 1,573 | 17 | 2,092 | 27,030 | X X X |
| 7. 2006 | 26,741 | 1,587 | 9,782 | 1,710 | 754 | 3 | 5,755 | 313 | 2,549 | 14 | 4,627 | 41,954 | X X X |
| 8. 2007 | 47,083 | 1,298 | 16,895 | 2,879 | 1,366 | 3 | 9,102 | 445 | 4,693 | 16 | 3,700 | 74,498 | X X X |
| 9. 2008 | 66,982 | 1,061 | 38,051 | 4,893 | 2,227 | 7 | 16,843 | 856 | 6,712 | 31 | 8,542 | 123,967 | X X X |
| 10. 2009 | 93,089 | 2,199 | 66,367 | 4,532 | 1,980 | 67 | 23,244 | 1,342 | 11,337 | 24 | 12,443 | 187,853 | X X X |
| 11. 2010 | 147,060 | 819 | 132,638 | 1,313 | 1,540 | 1 | 32,727 | 83 | 25,202 | | 20,411 | 336,951 | X X X |
| 12. Totals | 549,967 | 55,789 | 354,255 | 26,817 | 13,321 | 995 | 110,781 | 5,147 | 65,824 | 401 | 58,587 | 1,004,999 | X X X |

| | Total Losses and Loss Expenses Incurred | | | Loss and Loss Expense Percentage (Incurred/Premiums Earned) | | | Nontabular Discount | | 34 Inter-Company Pooling Participation Percentage | Net Balance Sheet Reserves After Discount | |
|------------|---|--------|---------|---|--------|--------|---------------------|--------------|--|---|----------------------|
| | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | | 35 | 36 |
| | Direct and Assumed | Ceded | Net | Direct and Assumed | Ceded | Net | Loss | Loss Expense | | Losses Unpaid | Loss Expenses Unpaid |
| 1. Prior | X X X | X X X | X X X | X X X | X X X | X X X | | | X X X | 127,978 | 24,130 |
| 2. 2001 | 606,615 | 41,157 | 565,458 | 78.643 | 85.939 | 78.160 | | | 9.200 | 10,918 | 2,118 |
| 3. 2002 | 572,805 | 54,769 | 518,036 | 68.293 | 66.422 | 68.497 | | | 9.200 | 12,516 | 2,270 |
| 4. 2003 | 561,243 | 46,515 | 514,728 | 61.291 | 60.821 | 61.334 | | | 9.200 | 11,267 | 3,092 |
| 5. 2004 | 572,902 | 24,042 | 548,860 | 58.137 | 44.219 | 58.949 | | | 9.200 | 15,113 | 3,344 |
| 6. 2005 | 592,937 | 23,029 | 569,908 | 57.757 | 55.383 | 57.857 | | | 9.200 | 21,427 | 5,603 |
| 7. 2006 | 601,838 | 16,782 | 585,056 | 58.702 | 36.652 | 59.733 | | | 9.200 | 33,226 | 8,728 |
| 8. 2007 | 626,620 | 16,623 | 609,997 | 59.881 | 32.527 | 61.286 | | | 9.200 | 59,801 | 14,697 |
| 9. 2008 | 711,096 | 23,027 | 688,069 | 68.088 | 59.305 | 68.427 | | | 9.200 | 99,079 | 24,888 |
| 10. 2009 | 638,175 | 35,111 | 603,064 | 65.129 | 57.296 | 65.652 | | | 9.200 | 152,725 | 35,128 |
| 11. 2010 | 666,543 | 3,631 | 662,912 | 68.823 | 18.541 | 69.861 | | | 9.200 | 277,566 | 59,385 |
| 12. Totals | X X X | X X X | X X X | X X X | X X X | X X X | | | X X X | 821,616 | 183,383 |

Note: Parts 2 and 4 are gross of all discounting, including tabular discounting. Part 1 is gross of only nontabular discounting, which is reported in Columns 32 and 33 of Part 1. The tabular discount, if any, is reported in the Notes to Financial Statements, which will reconcile Part 1 with Parts 2 and 4.

SCHEDULE P – PART 2 – SUMMARY

| Years in Which Losses Were Incurred | Incurred Net Losses and Defense and Cost Containment Expenses Reported At Year End (\$000 OMITTED) | | | | | | | | | | DEVELOPMENT | |
|-------------------------------------|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|-------------|----------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | One Year | Two Year |
| 1. Prior | 466,328 | 485,422 | 515,090 | 518,848 | 534,672 | 542,837 | 546,297 | 539,330 | 560,436 | 572,650 | 12,214 | 33,320 |
| 2. 2001 | 505,191 | 502,472 | 505,844 | 507,411 | 507,653 | 505,959 | 508,360 | 503,958 | 507,562 | 506,942 | (620) | 2,984 |
| 3. 2002 | X X X | 484,292 | 481,822 | 477,469 | 467,375 | 465,687 | 461,917 | 458,819 | 461,635 | 461,544 | (91) | 2,725 |
| 4. 2003 | X X X | X X X | 476,996 | 468,253 | 456,588 | 454,227 | 457,364 | 453,847 | 452,186 | 450,367 | (1,819) | (3,480) |
| 5. 2004 | X X X | X X X | X X X | 536,435 | 523,420 | 516,607 | 494,130 | 491,123 | 485,459 | 484,141 | (1,318) | (6,982) |
| 6. 2005 | X X X | X X X | X X X | X X X | 559,784 | 538,485 | 511,864 | 508,604 | 502,406 | 501,059 | (1,347) | (7,545) |
| 7. 2006 | X X X | X X X | X X X | X X X | X X X | 550,915 | 539,677 | 525,583 | 513,834 | 515,518 | 1,684 | (10,065) |
| 8. 2007 | X X X | X X X | X X X | X X X | X X X | X X X | 590,505 | 574,842 | 538,901 | 538,627 | (274) | (36,215) |
| 9. 2008 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 639,147 | 610,077 | 607,694 | (2,383) | (31,453) |
| 10. 2009 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 545,616 | 528,420 | (17,196) | X X X |
| 11. 2010 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 578,277 | X X X | X X X |
| 12. Totals | | | | | | | | | | | (11,150) | (56,711) |

SCHEDULE P – PART 3 – SUMMARY

| Years in Which Losses Were Incurred | Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported At Year End (\$000 OMITTED) | | | | | | | | | | 11 | 12 |
|-------------------------------------|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | Number of Claims Closed With Loss Payment | Number of Claims Closed Without Loss Payment |
| | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | | |
| 1. Prior | 000 | 143,745 | 234,970 | 291,028 | 330,089 | 358,169 | 379,192 | 397,126 | 408,880 | 423,757 | X X X | X X X |
| 2. 2001 | 250,507 | 362,568 | 414,278 | 447,150 | 465,556 | 476,445 | 482,818 | 488,129 | 491,229 | 493,908 | X X X | X X X |
| 3. 2002 | X X X | 220,705 | 323,077 | 371,818 | 405,873 | 423,284 | 433,362 | 439,737 | 443,176 | 446,857 | X X X | X X X |
| 4. 2003 | X X X | X X X | 222,710 | 320,713 | 367,698 | 398,348 | 419,043 | 428,077 | 433,515 | 436,454 | X X X | X X X |
| 5. 2004 | X X X | X X X | X X X | 231,074 | 347,024 | 401,104 | 433,226 | 452,198 | 461,575 | 466,073 | X X X | X X X |
| 6. 2005 | X X X | X X X | X X X | X X X | 236,563 | 351,254 | 406,170 | 441,862 | 464,220 | 475,036 | X X X | X X X |
| 7. 2006 | X X X | X X X | X X X | X X X | X X X | 240,921 | 357,936 | 408,889 | 450,030 | 475,448 | X X X | X X X |
| 8. 2007 | X X X | X X X | X X X | X X X | X X X | X X X | 250,353 | 371,862 | 427,690 | 468,151 | X X X | X X X |
| 9. 2008 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 290,279 | 429,241 | 489,762 | X X X | X X X |
| 10. 2009 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 242,461 | 351,423 | X X X | X X X |
| 11. 2010 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 266,305 | X X X | X X X |

SCHEDULE P – PART 4 – SUMMARY

| Years in Which Losses Were Incurred | Bulk and IBNR Reserves On Net Losses and Defense and Cost Containment Expenses Reported At Year End (\$000 OMITTED) | | | | | | | | | |
|-------------------------------------|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 |
| 1. Prior | 170,771 | 128,721 | 116,314 | 90,253 | 80,798 | 73,531 | 64,916 | 64,262 | 70,927 | 75,086 |
| 2. 2001 | 116,456 | 54,671 | 30,428 | 22,123 | 15,732 | 13,917 | 9,532 | 7,565 | 6,763 | 4,174 |
| 3. 2002 | X X X | 147,073 | 74,766 | 42,559 | 24,586 | 18,036 | 12,226 | 8,102 | 7,495 | 4,463 |
| 4. 2003 | X X X | X X X | 133,380 | 66,423 | 37,985 | 26,305 | 19,144 | 14,029 | 9,532 | 6,049 |
| 5. 2004 | X X X | X X X | X X X | 167,468 | 83,341 | 55,032 | 29,671 | 21,819 | 11,804 | 8,660 |
| 6. 2005 | X X X | X X X | X X X | X X X | 187,073 | 93,032 | 47,041 | 29,165 | 16,611 | 11,459 |
| 7. 2006 | X X X | X X X | X X X | X X X | X X X | 168,734 | 84,947 | 51,789 | 24,941 | 14,165 |
| 8. 2007 | X X X | X X X | X X X | X X X | X X X | X X X | 174,448 | 91,001 | 42,879 | 23,328 |
| 9. 2008 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 189,686 | 83,458 | 49,791 |
| 10. 2009 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 166,277 | 84,194 |
| 11. 2010 | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | X X X | 164,192 |

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated By States and Territories

| States, Etc. | | 1 Active Status | 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 Premium Written for Federal Purchasing Groups (Included in Col. 2) |
|------------------------------|--------|--------------------|--|-----------------------------|---|---|-----------------------------|---------------------------|---|--|
| | | | 2 Direct Premiums Written | 3 Direct Premiums Earned | | | | | | |
| | | | 1. Alabama | AL | | | | | | |
| 2. Alaska | AK | L | 181,886 | 197,020 | | 8,064 | 33,170 | 93,589 | 2,310 | |
| 3. Arizona | AZ | L | 1,225,900 | 1,472,520 | | 928,643 | 396,030 | 5,398,104 | 15,567 | |
| 4. Arkansas | AR | L | 484,215 | 568,483 | | 835,329 | 611,481 | 528,064 | 6,149 | |
| 5. California | CA | L | 42,459,173 | 45,037,979 | | 28,123,056 | 21,221,075 | 77,917,062 | 539,179 | |
| 6. Colorado | CO | L | 2,734,384 | 2,612,636 | | 2,031,158 | 921,798 | 2,979,957 | 34,723 | |
| 7. Connecticut | CT | L | 5,502,245 | 3,956,217 | | 3,073,923 | 1,368,775 | 7,241,813 | 69,872 | |
| 8. Delaware | DE | L | 209,252 | 211,131 | | 8,108 | 57,450 | 149,691 | 2,657 | |
| 9. District of Columbia | DC | L | 183,059 | 201,581 | | 3,553 | 86,040 | 295,783 | 2,325 | |
| 10. Florida | FL | L | 16,264,463 | 15,460,090 | | 8,308,595 | 12,135,112 | 18,305,134 | 206,539 | |
| 11. Georgia | GA | L | 7,068,518 | 7,243,055 | | 5,452,045 | 4,097,023 | 4,726,300 | 89,762 | |
| 12. Hawaii | HI | L | 12,578 | 19,415 | | | 64,908 | 110,947 | 160 | |
| 13. Idaho | ID | L | 1,522,533 | 1,725,406 | | 1,800,699 | 1,952,544 | 5,291,897 | 19,334 | |
| 14. Illinois | IL | L | 2,978,491 | 3,716,057 | | 3,305,317 | 4,254,193 | 17,103,618 | 37,823 | |
| 15. Indiana | IN | L | 1,641,706 | 1,617,948 | | 661,499 | 562,169 | 2,596,990 | 20,848 | |
| 16. Iowa | IA | L | 134,996 | 174,769 | | 35,447 | 75,601 | 289,766 | 1,714 | |
| 17. Kansas | KS | L | 916,500 | 978,174 | | 580,086 | 798,509 | 1,820,793 | 11,638 | |
| 18. Kentucky | KY | L | 1,135,698 | 1,178,320 | | 306,161 | 718,598 | 2,308,042 | 14,422 | |
| 19. Louisiana | LA | L | 46,760,391 | 41,000,777 | | 21,970,820 | 20,428,378 | 18,065,810 | 593,799 | |
| 20. Maine | ME | L | 25,229 | 50,293 | | 10,727 | 23,761 | 114,104 | 320 | |
| 21. Maryland | MD | L | 714,103 | 834,991 | | 199,048 | (67,499) | 1,798,046 | 9,068 | |
| 22. Massachusetts | MA | L | 1,072,581 | 1,132,371 | | 115,376 | 547,693 | 1,923,723 | 13,620 | |
| 23. Michigan | MI | L | 2,005,221 | 2,353,180 | | 1,417,315 | 680,076 | 3,290,355 | 25,464 | |
| 24. Minnesota | MN | L | 1,690,960 | 1,571,941 | | 2,049,374 | 4,331,629 | 12,246,368 | 21,473 | |
| 25. Mississippi | MS | L | 735,646 | 859,421 | | 818,532 | 198,334 | 2,591,314 | 9,342 | |
| 26. Missouri | MO | L | 1,811,548 | 2,073,079 | | 912,846 | 708,749 | 2,698,233 | 23,004 | |
| 27. Montana | MT | L | 2,389,583 | 2,764,045 | | 2,086,795 | 2,937,193 | 7,722,341 | 30,345 | |
| 28. Nebraska | NE | L | 133,905 | 114,689 | | 60,329 | (53,251) | 236,523 | 1,700 | |
| 29. Nevada | NV | L | 828,470 | 1,138,829 | | 2,455,020 | 4,129,251 | 3,302,212 | 10,521 | |
| 30. New Hampshire | NH | L | 633,338 | 640,201 | | 171,904 | 174,228 | 407,170 | 8,043 | |
| 31. New Jersey | NJ | L | 1,761,560 | 2,105,288 | | 929,271 | 1,808,990 | 8,599,540 | 22,370 | |
| 32. New Mexico | NM | L | 929,925 | 989,288 | | 1,149,781 | 2,767,237 | 4,201,601 | 11,809 | |
| 33. New York | NY | L | 16,372,847 | 18,328,224 | | 11,217,581 | 18,176,589 | 50,652,391 | 207,915 | |
| 34. North Carolina | NC | L | 4,963,212 | 4,683,735 | | 2,498,366 | 1,962,909 | 2,420,858 | 63,027 | |
| 35. North Dakota | ND | L | 203,852 | 232,245 | | 27,481 | 94,426 | 308,644 | 2,589 | |
| 36. Ohio | OH | L | 840,678 | 989,182 | | 1,337,436 | 4,838,121 | 7,314,135 | 10,676 | |
| 37. Oklahoma | OK | L | 1,016,430 | 1,037,014 | | 641,479 | 1,050,154 | 2,436,694 | 12,907 | |
| 38. Oregon | OR | L | 8,284,150 | 7,714,302 | 67,076 | 4,374,266 | 41,958,881 | 63,738,728 | 105,199 | |
| 39. Pennsylvania | PA | L | 6,952,981 | 7,316,970 | | 6,385,833 | 7,407,282 | 8,986,805 | 88,294 | |
| 40. Rhode Island | RI | L | 162,465 | 173,564 | | 68,149 | 47,220 | 232,504 | 2,063 | |
| 41. South Carolina | SC | L | 1,378,321 | 1,446,557 | | 980,483 | 1,313,610 | 1,999,284 | 17,503 | |
| 42. South Dakota | SD | L | 309,238 | 363,045 | | 246,779 | 151,143 | 397,290 | 3,927 | |
| 43. Tennessee | TN | L | 3,654,089 | 3,347,324 | | 4,106,720 | 3,312,329 | 12,022,499 | 46,402 | |
| 44. Texas | TX | L | 44,435,788 | 42,797,412 | | 26,345,992 | 21,930,666 | 30,796,277 | 564,280 | |
| 45. Utah | UT | L | 1,227,917 | 1,449,574 | | 2,156,105 | 152,922 | 1,877,430 | 15,593 | |
| 46. Vermont | VT | L | 7,393,504 | 6,276,151 | | 3,293,497 | 2,861,843 | 2,951,224 | 93,888 | |
| 47. Virginia | VA | L | 16,098,166 | 13,636,718 | | 7,138,909 | 9,611,013 | 6,439,770 | 204,427 | |
| 48. Washington | WA | L | 19,112,468 | 20,230,558 | | 8,732,550 | 12,516,381 | 33,123,241 | 242,705 | |
| 49. West Virginia | WV | L | 1,761,182 | 1,793,531 | | 1,517,754 | 1,106,243 | 554,075 | 22,365 | |
| 50. Wisconsin | WI | L | 218,786 | 193,963 | | 95,503 | 171,825 | 957,605 | 2,778 | |
| 51. Wyoming | WY | L | 861,757 | 871,327 | | 394,326 | 334,295 | 564,274 | 10,943 | |
| 52. American Samoa | AS | N | | | | | | | | |
| 53. Guam | GU | L | 775 | 77 | | | | | 10 | |
| 54. Puerto Rico | PR | L | 248,218 | 101,569 | | | 27,614 | 27,614 | | |
| 55. U.S. Virgin Islands | VI | L | 5,000 | 653 | | | | | 63 | |
| 56. Northern Mariana Islands | MP | N | | | | | | | | |
| 57. Canada | CN | N | (181) | (61) | | | 669,960 | 889,808 | | |
| 58. Aggregate Other Alien | OT | X X X | 123,682 | 52,083 | | | 6,970 | 6,970 | | |
| 59. Totals | (a) 54 | | 283,706,906 | 279,127,320 | 67,076 | 172,010,939 | 218,817,167 | 446,807,546 | 3,598,007 | |

| DETAILS OF WRITE-INS | | | | | | | | | | |
|----------------------|---|-------|---------|--------|--|--|-------|-------|--|--|
| 5801. | Other alien | X X X | 123,682 | 52,083 | | | 6,970 | 6,970 | | |
| 5802. | | X X X | | | | | | | | |
| 5803. | | X X X | | | | | | | | |
| 5898. | Summary of remaining write-ins for Line 58 from overflow page | X X X | | | | | | | | |
| 5899. | Totals (Lines 5801 through 5803 plus 5898) (Line 58 above) | X X X | 123,682 | 52,083 | | | 6,970 | 6,970 | | |

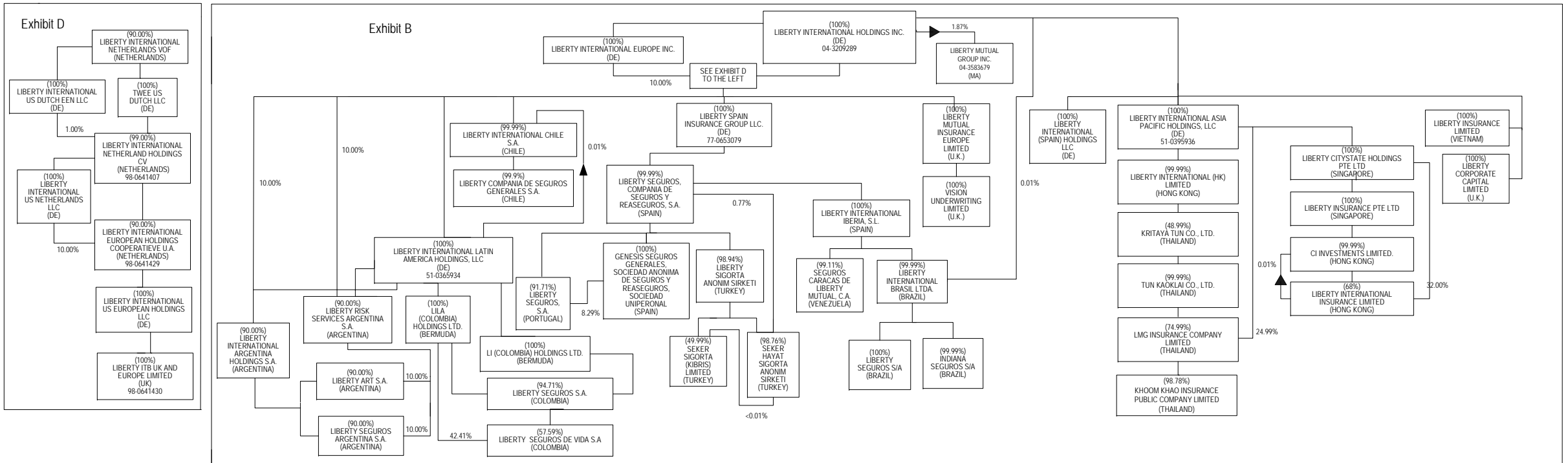
(L) Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) Registered - Non-domiciled RRGs; (Q) Qualified - Qualified or Accredited Reinsurer; (E) Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) None of the above - Not allowed to write business in the state.

| Explanation of basis of allocation of premiums by states, etc. | |
|--|---|
| *Location of coverage - Fire, Allied Lines, Homeowners Multi Peril, Commercial Multi Peril, Earthquake, Boiler and Machinery | *Location of Court - Surety |
| *States employee's main work place - Worker's Compensation | *Address of Assured - Other Accident and Health |
| *Location of Principal place of garaging of each individual car - Auto Liability, Auto Physical Damage | *Location of Properties covered - Burglary and Theft |
| *Principal Location of business or location of coverage - Liability other than Auto, Fidelity, Warranty | *Principal Location of Assured - Ocean Marine, Credit |
| *Point of origin of shipment or principal location of assured - Inland Marine | *Primary residence of Assured - Aircraft (all perils) |
| *State in which employees regularly work - Group Accident and Health | |

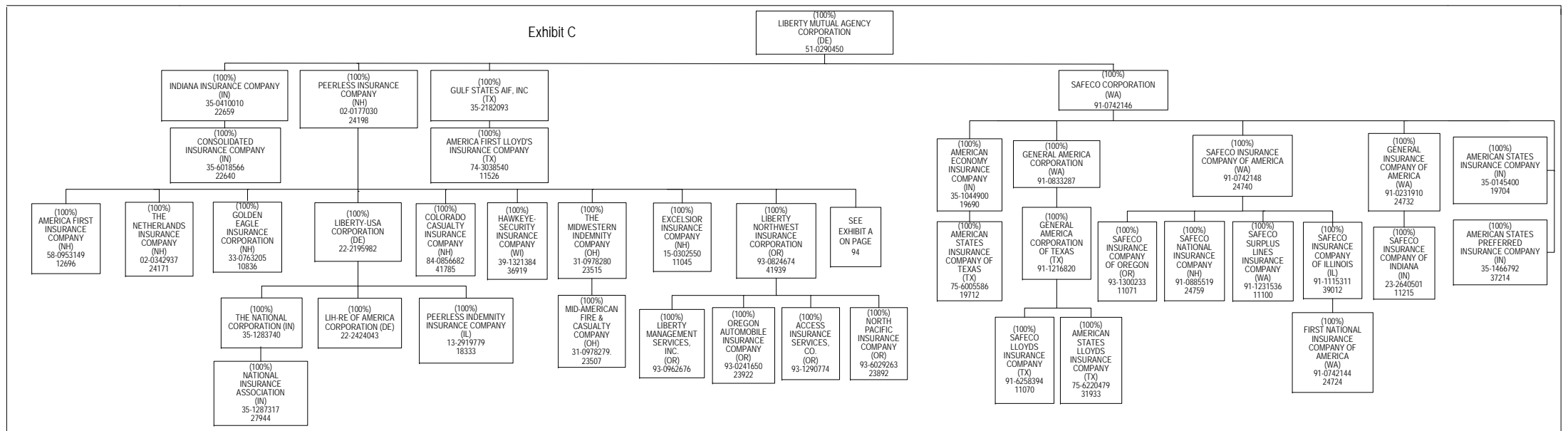
(a) Insert the number of L responses except for Canada and Other Alien.

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

PART 1 - ORGANIZATIONAL CHART



94.1



OVERFLOW PAGE FOR WRITE-INS

Page 3 - Continuation

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|--|--------------|------------|
| REMAINING WRITE-INS AGGREGATED AT LINE 25 FOR LIABILITIES | Current Year | Prior Year |
| 2504. Amounts held under uninsured plans | 989,992 | 6,670,270 |
| 2505. Private passenger auto escrow | 98,460 | 150,367 |
| 2506. Collateral held for securities loaned | | 22,243,145 |
| 2597. Totals (Lines 2504 through 2596) (Page 3, Line 2598) | 1,088,452 | 29,063,782 |

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