

**ANNUAL STATEMENT**

**OF THE**

**AMERICAN ECONOMY INSURANCE COMPANY**

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**of** **INDIANAPOLIS**

**in the state of** **INDIANA**

**TO THE**

**Insurance Department**

**OF THE**

**FOR THE YEAR ENDED**

**December 31, 2011**

**PROPERTY AND CASUALTY**

**2011**



19690201120100100

# ANNUAL STATEMENT

For the Year Ended December 31, 2011  
OF THE CONDITION AND AFFAIRS OF THE

## American Economy Insurance Company

**NAIC Group Code** 0111 0111 **NAIC Company Code** 19690 **Employer's ID Number** 35-1044900  
(Current Period) (Prior Period)

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

**Incorporated/Organized** October 19, 1959 **Commenced Business** October 23, 1959

**Statutory Home Office** 350 East 96th Street, Indianapolis, IN 46240  
(Street and Number) (City or Town, State and Zip Code)

**Main Administrative Office** 175 Berkeley Street  
(Street and Number)  
Boston, MA 02116 617-357-9500  
(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**  
James Paul Condrin, III #

	Name	Title
1.	<u>James Paul Condrin, III #</u>	<u>President and Chief Executive Officer</u>
2.	<u>Dexter Robert Legg</u>	<u>Secretary</u>
3.	<u>James Paul McKenney #</u>	<u>Treasurer and Chief Financial Officer</u>

### VICE-PRESIDENTS

Name	Title	Name	Title
<u>Anthony Alexander Fontanes</u>	<u>EVP and Chief Investment Officer</u>	<u>Micahel Joseph Fallon #</u>	<u>Executive Vice President</u>

### DIRECTORS OR TRUSTEES

<u>James Paul Condrin, III #</u>	<u>John Derek Doyle</u>	<u>Michael Joseph Fallon</u>	<u>Kevin John Kirschner</u>
<u>Dexter Robert Legg #</u>	<u>Christopher Charles Mansfield</u>	<u>James Paul McKenney #</u>	

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) <u>James Paul Condrin, III #</u> _____ (Printed Name) 1. <u>President and Chief Executive Officer</u> _____ (Title)	_____ (Signature) <u>Dexter Robert Legg</u> _____ (Printed Name) 2. <u>Secretary</u> _____ (Title)	_____ (Signature) <u>James Paul McKenney #</u> _____ (Printed Name) 3. <u>Treasurer and Chief Financial Officer</u> _____ (Title)
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Subscribed and sworn to (or affirmed) before me on this  
23rd day of January, 2012, 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)	847,966,089		847,966,089	863,129,921
2. Stocks (Schedule D):				
2.1 Preferred stocks	12,046,800		12,046,800	13,188,900
2.2 Common stocks	68,145,433		68,145,433	60,636,860
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens	26,843,049	86,730	26,756,319	27,192,600
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 (\$ 100,108, Schedule E - Part 1), cash equivalents (\$ 8,884,381, Schedule E - Part 2), and short-term investments (\$ 34,769,559, Schedule DA)	43,754,048		43,754,048	19,809,709
6. Contract loans (including \$ 0 premium notes)				
7. Derivatives (Schedule DB)				
8. Other invested assets (Schedule BA)	88,296		88,296	86,999
9. Receivables for securities	4,581,993		4,581,993	584,990
10. Securities lending reinvested collateral assets (Schedule DL)	5,716,337		5,716,337	11,438,307
11. Aggregate write-ins for invested assets				
12. Subtotals, cash and invested assets (Lines 1 to 11)	1,009,142,045	86,730	1,009,055,315	996,068,286
13. Title plants less \$ 0 charged off (for Title insurers only)				
14. Investment income due and accrued	8,969,444		8,969,444	9,504,803
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	25,339,505	2,899,311	22,440,194	20,102,764
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ 350,776 earned but unbilled premiums)	168,900,188	35,078	168,865,110	161,676,876
15.3 Accrued retrospective premiums	287,288	28,701	258,587	513,008
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	17,912,808		17,912,808	12,277,222
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	1,993,419		1,993,419	8,760,541
18.2 Net deferred tax asset	57,184,000	29,201,570	27,982,430	35,415,596
19. Guaranty funds receivable or on deposit	673,304		673,304	946,222
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	5,260,364		5,260,364	6,492,210
24. Health care (\$ 0) and other amounts receivable				
25. Aggregate write-ins for other than invested assets	5,495,532	676,858	4,818,674	4,906,437
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	1,301,157,897	32,928,248	1,268,229,649	1,256,663,965
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts				
28. Total (Lines 26 and 27)	1,301,157,897	32,928,248	1,268,229,649	1,256,663,965

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	3,307,509		3,307,509	3,255,438
2502. Equities and deposits in pools and associations	1,466,929		1,466,929	1,481,366
2503. Other assets	721,094	676,858	44,236	169,633
2598. Summary of remaining write-ins for Line 25 from overflow page				
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)	5,495,532	676,858	4,818,674	4,906,437

## LIABILITIES, SURPLUS AND OTHER FUNDS

	1	2
	Current Year	Prior Year
1. Losses (Part 2A, Line 35, Column 8)	504,804,800	500,110,560
2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6)	37,679,383	33,556,125
3. Loss adjustment expenses (Part 2A, Line 35, Column 9)	111,621,344	111,617,900
4. Commissions payable, contingent commissions and other similar charges	15,716,607	15,105,240
5. Other expenses (excluding taxes, licenses and fees)	8,799,976	4,420,876
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	4,154,838	5,051,601
7.1 Current federal and foreign income taxes (including \$ 0 on realized capital gains (losses))		
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 \$ 124,843,138 and including warranty reserves of \$ 0 and accrued accident and health experience rating refunds including \$ 0 for medical loss ratio rebate per the Public Health Service Act)	282,190,835	271,776,831
10. Advance premium	1,926,261	1,842,016
11. Dividends declared and unpaid:		
11.1 Stockholders		
11.2 Policyholders	77,270	52,492
12. Ceded reinsurance premiums payable (net of ceding commissions)	18,120,154	18,882,943
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	553,905	274,250
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	19,940,142	18,330,381
19. Payable to parent, subsidiaries and affiliates	6,889,286	11,334,004
20. Derivatives		
21. Payable for securities	6,685,537	6,991,840
22. Payable for securities lending	5,716,337	11,438,307
23. Liability for amounts held under uninsured plans		
24. Capital notes \$ 0 and interest thereon \$ 0		
25. Aggregate write-ins for liabilities	9,322,941	9,592,358
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	1,034,199,616	1,020,377,724
27. Protected cell liabilities		
28. Total liabilities (Lines 26 and 27)	1,034,199,616	1,020,377,724
29. Aggregate write-ins for special surplus funds	10,504,733	9,949,447
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	206,979,280	206,979,280
35. Unassigned funds (surplus)	11,546,020	14,357,514
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)	234,030,033	236,286,241
38. Totals (Page 2, Line 28, Col. 3)	1,268,229,649	1,256,663,965

DETAILS OF WRITE-IN LINES		
2501. Retroactive reinsurance reserves	4,967,483	5,342,458
2502. Other liabilities	4,053,806	2,905,610
2503. Amounts held under uninsured plans	301,652	602,604
2598. Summary of remaining write-ins for Line 25 from overflow page		741,686
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)	9,322,941	9,592,358
2901. SSAP 10R incremental change	9,327,477	8,738,224
2902. Special surplus from retroactive reinsurance	1,177,256	1,211,223
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page		
2999. Totals (Lines 2901 through 2903 plus 2998) (Line 29 above)	10,504,733	9,949,447
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
<b>UNDERWRITING INCOME</b>		
1. Premiums earned (Part 1, Line 35, Column 4)	586,389,471	577,594,080
DEDUCTIONS:		
2. Losses incurred (Part 2, Line 35, Column 7)	362,787,722	323,631,706
3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1)	70,840,263	68,185,720
4. Other underwriting expenses incurred (Part 3, Line 25, Column 2)	189,056,610	194,108,456
5. Aggregate write-ins for underwriting deductions	(59,937)	(31,596)
6. Total underwriting deductions (Lines 2 through 5)	622,624,658	585,894,286
7. Net income of protected cells		
8. Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7)	(36,235,187)	(8,300,206)
<b>INVESTMENT INCOME</b>		
9. Net investment income earned (Exhibit of Net Investment Income, Line 17)	41,688,783	46,562,911
10. Net realized capital gains (losses) less capital gains tax of \$ 706,622 (Exhibit of Capital Gains (Losses))	1,312,298	9,004,654
11. Net investment gain (loss) (Lines 9 + 10)	43,001,081	55,567,565
<b>OTHER INCOME</b>		
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$ 20,769 amount charged off \$ 1,331,438)	(1,310,669)	(2,426,980)
13. Finance and service charges not included in premiums	4,950,866	5,096,734
14. Aggregate write-ins for miscellaneous income	(1,834,864)	(7,239,262)
15. Total other income (Lines 12 through 14)	1,805,333	(4,569,508)
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	8,571,227	42,697,851
17. Dividends to policyholders	1,177,584	(197,359)
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)	7,393,643	42,895,210
19. Federal and foreign income taxes incurred	(2,034,622)	(5,539,360)
20. Net income (Line 18 minus Line 19) (to Line 22)	9,428,265	48,434,570
<b>CAPITAL AND SURPLUS ACCOUNT</b>		
21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2)	236,286,241	508,630,666
22. Net income (from Line 20)	9,428,265	48,434,570
23. Net transfers (to) from Protected Cell accounts		
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$ (1,684,184)	(2,532,332)	123,335
25. Change in net unrealized foreign exchange capital gain (loss)		
26. Change in net deferred income tax	(656,884)	(12,476,174)
27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Col. 3)	(9,533,248)	7,072,276
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	448,738	
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		(136,602,521)
33.2 Transferred to capital (Stock Dividend)		
33.3 Transferred from capital		
34. Net remittances from or (to) Home Office		
35. Dividends to stockholders		(169,397,479)
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	589,253	(9,498,432)
38. Change in surplus as regards policyholders for the year (Lines 22 through 37)	(2,256,208)	(272,344,425)
39. Surplus as regards policyholders, December 31 current year (Lines 21 plus Line 38) (Page 3, Line 37)	234,030,033	236,286,241

<b>DETAILS OF WRITE-IN LINES</b>		
0501. Private passenger auto escrow	(59,937)	(31,596)
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)	(59,937)	(31,596)
1401. Retroactive reinsurance gain/(loss)	(119,538)	(7,152,755)
1402. Other income/(expense)	(1,715,326)	(86,507)
1403.		
1498. Summary of remaining write-ins for Line 14 from overflow page		
1499. Totals (Lines 1401 through 1403 plus 1498) (Line 14 above)	(1,834,864)	(7,239,262)
3701. SSAP 10R incremental change	589,253	(9,157,938)
3702. Other changes in surplus		(340,494)
3703.		
3798. Summary of remaining write-ins for Line 37 from overflow page		
3799. Totals (Lines 3701 through 3703 plus 3798) (Line 37 above)	589,253	(9,498,432)

## CASH FLOW

	1	2
	Current Year	Prior Year
<b>Cash from Operations</b>		
1. Premiums collected net of reinsurance	586,513,885	599,139,734
2. Net investment income	45,633,664	54,284,573
3. Miscellaneous income	1,858,395	(8,613,390)
4. Total (Lines 1 through 3)	634,005,944	644,810,917
5. Benefit and loss related payments	357,996,049	339,764,391
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts		
7. Commissions, expenses paid and aggregate write-ins for deductions	255,350,981	288,971,844
8. Dividends paid to policyholders	1,152,806	225,587
9. Federal and foreign income taxes paid (recovered) net of \$ 0 tax on capital gains (losses)	(8,095,122)	7,975,898
10. Total (Lines 5 through 9)	606,404,714	636,937,720
11. Net cash from operations (Line 4 minus Line 10)	27,601,230	7,873,197
<b>Cash from Investments</b>		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds	229,306,517	704,774,240
12.2 Stocks	9,373,959	22,948,340
12.3 Mortgage loans	738,092	475,319
12.4 Real estate		
12.5 Other invested assets	79,502,712	
12.6 Net gains (or losses) on cash, cash equivalents and short-term investments		
12.7 Miscellaneous proceeds	(3,997,002)	(584,990)
12.8 Total investment proceeds (Lines 12.1 to 12.7)	314,924,278	727,612,909
13. Cost of investments acquired (long-term only):		
13.1 Bonds	217,342,857	414,934,180
13.2 Stocks	18,148,410	35,324,673
13.3 Mortgage loans	388,807	16,949,481
13.4 Real estate		
13.5 Other invested assets	73,780,742	11,525,306
13.6 Miscellaneous applications	306,303	(6,991,840)
13.7 Total investments acquired (Lines 13.1 to 13.6)	309,967,119	471,741,800
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)	4,957,159	255,871,109
<b>Cash from Financing and Miscellaneous Sources</b>		
16. Cash provided (applied):		
16.1 Surplus notes, capital notes		
16.2 Capital and paid in surplus, less treasury stock		(136,602,521)
16.3 Borrowed funds		
16.4 Net deposits on deposit-type contracts and other insurance liabilities		
16.5 Dividends to stockholders		169,397,479
16.6 Other cash provided (applied)	(8,614,050)	6,635,936
17. Net cash from financing and miscellaneous sources (Lines 16.1 to Line 16.4 minus Line 16.5 plus Line 16.6)	(8,614,050)	(299,364,064)
<b>RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS</b>		
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	23,944,339	(35,619,758)
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year	19,809,709	55,429,467
19.2 End of year (Line 18 plus Line 19.1)	43,754,048	19,809,709

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

20.0001	12.1 - Proceeds from investments sold, matured or repaid - Bonds	249,107,071
20.0002	12.2 - Proceeds from investments sold, matured or repaid - Stocks	23,361,330
20.0003	16.5 Dividends to stockholders	148,397,479
20.0004	16.2 Capital and paid in surplus, less treasury stock	(71,702,766)

## 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	11,302,302	5,585,310	5,963,346	10,924,266
2. Allied lines	9,382,670	4,637,662	5,097,027	8,923,305
3. Farmowners multiple peril	4,669,159	2,173,491	2,341,980	4,500,670
4. Homeowners multiple peril	93,537,588	44,853,620	49,749,790	88,641,418
5. Commercial multiple peril	104,465,651	53,157,758	52,395,223	105,228,186
6. Mortgage guaranty				
8. Ocean marine				
9. Inland marine	9,457,260	4,557,115	4,563,292	9,451,083
10. Financial guaranty				
11.1 Medical professional liability—occurrence	41,187	20,235	16,304	45,118
11.2 Medical professional liability—claims-made	5,567	2,338	2,564	5,341
12. Earthquake	1,972,571	973,580	1,019,168	1,926,983
13. Group accident and health				
14. Credit accident and health (group and individual)				
15. Other accident and health				
16. Workers' compensation	49,513,162	21,307,815	19,242,706	51,578,271
17.1 Other liability—occurrence	29,892,774	14,953,059	14,636,540	30,209,293
17.2 Other liability—claims-made	1,271,910	598,536	572,038	1,298,408
17.3 Excess workers' compensation				
18.1 Products liability—occurrence	732,259	416,817	369,928	779,148
18.2 Products liability—claims-made				
19.1,19.2 Private passenger auto liability	107,810,245	39,720,243	44,065,784	103,464,704
19.3,19.4 Commercial auto liability	45,729,822	22,883,660	22,101,687	46,511,795
21. Auto physical damage	83,722,242	32,735,849	35,590,536	80,867,555
22. Aircraft (all perils)				
23. Fidelity	360,736	299,723	294,439	366,020
24. Surety	41,577,159	24,405,539	24,338,417	41,644,281
26. Burglary and theft	15,711	8,353	7,839	16,225
27. Boiler and machinery	6,081	4,637	3,316	7,402
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	595,466,056	273,295,340	282,371,924	586,389,472

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	5,963,346				5,963,346
2. Allied lines	5,097,027				5,097,027
3. Farmowners multiple peril	2,341,980				2,341,980
4. Homeowners multiple peril	49,749,790				49,749,790
5. Commercial multiple peril	52,195,590	394	196,084	3,154	52,395,222
6. Mortgage guaranty					
8. Ocean marine					
9. Inland marine	4,551,791	11,501			4,563,292
10. Financial guaranty					
11.1 Medical professional liability—occurrence	16,304				16,304
11.2 Medical professional liability—claims-made	2,554	10			2,564
12. Earthquake	1,019,168				1,019,168
13. Group accident and health					
14. Credit accident and health (group and individual)					
15. Other accident and health					
16. Workers' compensation	19,317,374		212,621	(287,288)	19,242,707
17.1 Other liability—occurrence	14,521,939	59,030	58,725	(3,154)	14,636,540
17.2 Other liability—claims-made	565,104	6,665	269		572,038
17.3 Excess workers' compensation					
18.1 Products liability—occurrence	369,249		679		369,928
18.2 Products liability—claims-made					
19.1,19.2 Private passenger auto liability	44,065,784				44,065,784
19.3,19.4 Commercial auto liability	21,933,379	168,307			22,101,686
21. Auto physical damage	35,562,611	27,925			35,590,536
22. Aircraft (all perils)					
23. Fidelity	104,119	190,320			294,439
24. Surety	16,735,589	7,602,828			24,338,417
26. Burglary and theft	7,839				7,839
27. Boiler and machinery	3,316				3,316
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	274,123,853	8,066,980	468,378	(287,288)	282,371,923
36. Accrued retrospective premiums based on experience					287,288
37. Earned but unbilled premiums					(468,378)
38. Balance (Sum of Lines 35 through 37)					282,190,833

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	2,455,091	11,302,302		2,455,091		11,302,302
2. Allied lines	2,107,952	9,382,670		2,107,952		9,382,670
3. Farmowners multiple peril	9,296,733	4,669,159		9,296,733		4,669,159
4. Homeowners multiple peril	107,955	93,537,588		107,955		93,537,588
5. Commercial multiple peril	180,998,939	104,465,651		180,998,939		104,465,651
6. Mortgage guaranty						
8. Ocean marine						
9. Inland marine	888,721	9,457,260		888,721		9,457,260
10. Financial guaranty						
11.1 Medical professional liability--occurrence		41,187				41,187
11.2 Medical professional liability--claims-made		5,567				5,567
12. Earthquake	1,222,454	1,972,571		1,222,454		1,972,571
13. Group accident and health						
14. Credit accident and health (group and individual)						
15. Other accident and health						
16. Workers' compensation	20,739,947	49,513,162		20,739,947		49,513,162
17.1 Other liability—occurrence	3,014,493	29,892,774		3,014,493		29,892,774
17.2 Other liability—claims-made	13,370	1,271,910		13,370		1,271,910
17.3 Excess workers' compensation						
18.1 Products liability—occurrence	548,940	732,259		548,940		732,259
18.2 Products liability—claims-made						
19.1,19.2 Private passenger auto liability	123,144	107,810,245		123,144		107,810,245
19.3,19.4 Commercial auto liability	29,642,386	45,729,823		29,642,386		45,729,823
21. Auto physical damage	6,397,647	83,722,242		6,397,647		83,722,242
22. Aircraft (all perils)						
23. Fidelity	43,880	360,736		43,880		360,736
24. Surety	68,011	41,577,159		68,011		41,577,159
26. Burglary and theft	12,080	15,711		12,080		15,711
27. Boiler and machinery	199,693	6,081		199,693		6,081
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	257,881,436	595,466,057		257,881,436		595,466,057

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



## UNDERWRITING AND INVESTMENT EXHIBIT

### PART 2A – UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

Line of Business	Reported Losses				Incurred But Not Reported			Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	Net Unpaid Loss Adjustment Expenses
	1 Direct	2 Reinsurance Assumed	3 Deduct Reinsurance Recoverable from Authorized and Unauthorized Companies	4 Net Losses Excl. Incurred But Not Reported (Cols. 1 + 2 - 3)	5 Direct	6 Reinsurance Assumed	7 Reinsurance Ceded		
1. Fire	145,811	1,204,747	145,811	1,204,747	117,130	677,421	117,130	1,882,168	156,204
2. Allied lines	486,500	1,502,998	486,500	1,502,998	28,497	155,210	28,497	1,658,208	99,672
3. Farmowners multiple peril	1,681,218	935,421	1,681,218	935,421	33,889	11,619	33,889	947,040	308,004
4. Homeowners multiple peril	57,474	17,584,281	57,474	17,584,281	14,673	9,116,591	14,673	26,700,872	4,118,530
5. Commercial multiple peril	100,807,227	63,523,439	100,807,227	63,523,439	65,801,809	40,523,531	65,801,809	104,046,970	42,671,598
6. Mortgage guaranty									
8. Ocean marine		1,587		1,587		(237)		1,350	3
9. Inland marine	84,878	604,485	84,878	604,485	19,398	(34,279)	19,398	570,206	92,950
10. Financial guaranty									
11.1 Medical professional liability—occurrence		22,057		22,057		128,734		150,791	77,554
11.2 Medical professional liability—claims-made						29,631		29,631	8,374
12. Earthquake		89		89				89	939
13. Group accident and health								(a)	(143)
14. Credit accident and health (group and individual)									
15. Other accident and health		571,214		571,214		2,028,465		(a)	2,599,679
16. Workers' compensation	50,650,826	104,001,315	50,650,826	104,001,315	27,843,056	61,069,632	27,843,056	165,070,947	19,599,185
17.1 Other liability—occurrence	7,503,437	18,688,224	7,503,437	18,688,224	5,026,963	29,319,700	5,026,963	48,007,924	13,584,379
17.2 Other liability—claims-made	48,000	822,164	48,000	822,164	11,495	1,185,111	11,495	2,007,275	1,309,968
17.3 Excess workers' compensation									19
18.1 Products liability—occurrence	1,191,150	1,319,181	1,191,150	1,319,181	451,488	479,209	451,488	1,798,390	655,080
18.2 Products liability—claims-made									
19.1,19.2 Private passenger auto liability	17,695,026	64,419,111	17,695,026	64,419,111	239,826	10,674,011	239,826	75,093,122	14,620,684
19.3,19.4 Commercial auto liability	22,002,814	33,863,671	22,002,814	33,863,671	12,449,149	18,770,297	12,449,149	52,633,968	8,006,815
21. Auto physical damage	533,865	1,561,409	533,865	1,561,409	77,435	1,451,626	77,435	3,013,035	544,319
22. Aircraft (all perils)		25,824		25,824		113		25,937	
23. Fidelity	2,415	24,980	2,415	24,980	(5,131)	93,725	(5,131)	118,705	42,906
24. Surety		(4,240,589)		(4,240,589)	43,832	11,598,317	43,832	7,357,728	5,070,360
26. Burglary and theft		17		17		150		167	735
27. Boiler and machinery		(4,059)		(4,059)	817	(777)	817	(4,836)	2,105
28. Credit									
29. International									
30. Warranty									
31. Reinsurance-nonproportional assumed property	X X X				X X X				
32. Reinsurance-nonproportional assumed liability	X X X	4,716,435		4,716,435	X X X	6,378,998		11,095,433	304,845
33. Reinsurance-nonproportional assumed financial lines	X X X				X X X				
34. Aggregate write-ins for other lines of business									
35. TOTALS	202,890,641	311,148,001	202,890,641	311,148,001	112,154,326	193,656,798	112,154,326	504,804,799	111,621,344

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) Including \$ 0 for present value of life indemnity claims.

## UNDERWRITING AND INVESTMENT EXHIBIT

### PART 3 - EXPENSES

	1	2	3	4
	Loss Adjustment Expenses	Other Underwriting Expenses	Investment Expenses	Total
1. Claim adjustment services:				
1.1 Direct	19,055,078			19,055,078
1.2 Reinsurance assumed	27,509,737			27,509,737
1.3 Reinsurance ceded	19,055,078			19,055,078
1.4 Net claim adjustment services (1.1 + 1.2 - 1.3)	27,509,737			27,509,737
2. Commission and brokerage:				
2.1 Direct, excluding contingent		38,267,615		38,267,615
2.2 Reinsurance assumed, excluding contingent		88,559,477		88,559,477
2.3 Reinsurance ceded, excluding contingent		38,267,615		38,267,615
2.4 Contingent—direct				
2.5 Contingent—reinsurance assumed		8,292,583		8,292,583
2.6 Contingent—reinsurance ceded				
2.7 Policy and membership fees				
2.8 Net commission and brokerage (2.1+2.2-2.3+2.4+2.5-2.6+2.7)		96,852,060		96,852,060
3. Allowances to manager and agents	4,343	31,904		36,247
4. Advertising	396,852	4,547,160	17,011	4,961,023
5. Boards, bureaus and associations	87,510	1,226,226	488	1,314,224
6. Surveys and underwriting reports	6,650	3,635,906	12,102	3,654,658
7. Audit of assureds' records				
8. Salary and related items:				
8.1 Salaries	25,198,073	31,978,682	1,093,336	58,270,091
8.2 Payroll taxes	686,517	3,622,870	36,715	4,346,102
9. Employee relations and welfare	3,673,624	12,890,636	139,937	16,704,197
10. Insurance	1,914,191	515,816	20,136	2,450,143
11. Directors' fees	78	111		189
12. Travel and travel items	1,822,214	2,393,823	37,117	4,253,154
13. Rent and rent items	1,128,998	4,097,673	44,894	5,271,565
14. Equipment	906,749	2,210,349	24,358	3,141,456
15. Cost or depreciation of EDP equipment and software	222,589	2,063,221	51,998	2,337,808
16. Printing and stationery	395,412	502,458	4,671	902,541
17. Postage, telephone and telegraph, exchange and express	2,402,333	1,968,210	50,678	4,421,221
18. Legal and auditing	119,968	381,743	74,380	576,091
19. Totals (Lines 3 to 18)	38,966,101	72,066,788	1,607,821	112,640,710
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of \$ 182,548		13,166,804		13,166,804
20.2 Insurance department licenses and fees		1,655,233		1,655,233
20.3 Gross guaranty association assessments		106,338		106,338
20.4 All other (excluding federal and foreign income and real estate)		1,166,356		1,166,356
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4)		16,094,731		16,094,731
21. Real estate expenses				
22. Real estate taxes				
23. Reimbursements by uninsured plans				
24. Aggregate write-ins for miscellaneous expenses	4,364,422	4,043,029	312,258	8,719,709
25. Total expenses incurred	70,840,260	189,056,608	1,920,079	(a) 261,816,947
26. Less unpaid expenses—current year	111,621,344	28,671,422		140,292,766
27. Add unpaid expenses—prior year	111,617,900	24,577,716		136,195,616
28. Amounts receivable relating to uninsured plans, prior year				
29. Amounts receivable relating to uninsured plans, current year				
30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29)	70,836,816	184,962,902	1,920,079	257,719,797

DETAILS OF WRITE-IN LINES				
2401. Other expenses	4,364,422	4,043,029	312,258	8,719,709
2402.				
2403.				
2498. Sum of remaining write-ins for Line 24 from overflow page				
2499. Totals (Lines 2401 through 2403 plus 2498) (Line 24 above)	4,364,422	4,043,029	312,258	8,719,709

(a) Includes management fees of \$ 5,833,581 to affiliates and \$ 71,502 to non-affiliates.

## EXHIBIT OF NET INVESTMENT INCOME

	1 Collected During Year	2 Earned During Year
1. U.S. Government bonds	(a) 4,001,916	4,052,797
1.1 Bonds exempt from U.S. tax	(a) 11,859,025	11,440,250
1.2 Other bonds (unaffiliated)	(a) 24,088,556	23,901,368
1.3 Bonds of affiliates	(a)	
2.1 Preferred stocks (unaffiliated)	(b) 864,724	864,724
2.11 Preferred stocks of affiliates	(b)	
2.2 Common stocks (unaffiliated)	672,938	690,641
2.21 Common stocks of affiliates		
3. Mortgage loans	(c) 1,816,260	1,815,059
4. Real estate	(d)	
5. Contract loans		
6. Cash, cash equivalents and short-term investments	(e) 35,752	38,974
7. Derivative instruments	(f)	
8. Other invested assets		
9. Aggregate write-ins for investment income	805,052	805,052
10. Total gross investment income	44,144,223	43,608,865
11. Investment expenses		(g) 1,920,081
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)		1,920,081
17. Net investment income (Line 10 minus Line 16)		41,688,784

DETAILS OF WRITE-IN LINES		
0901. Miscellaneous Income/(Expense)	805,052	805,052
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)	805,052	805,052
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 \$ 881,654 accrual of discount less \$ 4,291,175 amortization of premium and less \$ 907,727 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 \$ 780 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 \$ 322 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					
1.1 Bonds exempt from U.S. tax	482,455		482,455		
1.2 Other bonds (unaffiliated)	1,732,085	(24,361)	1,707,724	(1,980,829)	
1.3 Bonds of affiliates					
2.1 Preferred stocks (unaffiliated)				(1,142,100)	
2.11 Preferred stocks of affiliates					
2.2 Common stocks (unaffiliated)	352,384	(523,377)	(170,993)	(1,690,322)	
2.21 Common stocks of affiliates				595,438	
3. Mortgage loans	(266)		(266)		
4. Real estate					
5. Contract loans					
6. Cash, cash equivalents and short-term investments					
7. Derivative instruments					
8. Other invested assets				1,297	
9. Aggregate write-ins for capital gains (losses)					
10. Total capital gains (losses)	2,566,658	(547,738)	2,018,920	(4,216,516)	

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)					

## EXHIBIT OF NONADMITTED ASSETS

	1	2	3
	Current Year Total Nonadmitted Assets	Prior Year Total Nonadmitted Assets	Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D)			
2. Stocks (Schedule D):			
2.1 Preferred stocks			
2.2 Common stocks			
3. Mortgage loans on real estate (Schedule B):			
3.1 First liens	86,730		(86,730)
3.2 Other than first liens			
4. Real estate (Schedule A):			
4.1 Properties occupied by the company			
4.2 Properties held for the production of income			
4.3 Properties held for sale			
5. Cash (Schedule E - Part 1), cash equivalents (Schedule E - Part 2), and short-term investments (Schedule DA)			
6. Contract loans			
7. Derivatives (Schedule DB)			
8. Other invested assets (Schedule BA)			
9. Receivables for securities			
10. Securities lending reinvested collateral assets (Schedule DL)			
11. Aggregate write-ins for invested assets			
12. Subtotals, cash and invested assets (Lines 1 to 11)	86,730		(86,730)
13. Title plants (for Title insurers only)			
14. Investment income due and accrued			
15. Premiums and considerations:			
15.1 Uncollected premiums and agents' balances in the course of collection	2,899,311	2,425,228	(474,083)
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due	35,078	3,749	(31,329)
15.3 Accrued retrospective premiums	28,701	56,910	28,209
16. Reinsurance:			
16.1 Amounts recoverable from reinsurers			
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			
18.2 Net deferred tax asset	29,201,570	20,741,104	(8,460,466)
19. Guaranty funds receivable or on deposit			
20. Electronic data processing equipment and software			
21. Furniture and equipment, including health care delivery assets			
22. Net adjustment in assets and liabilities due to foreign exchange rates			
23. Receivables from parent, subsidiaries and affiliates			
24. Health care and other amounts receivable			
25. Aggregate write-ins for other than invested assets	676,858	757,262	80,404
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	32,928,248	23,984,253	(8,943,995)
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			
28. Total (Lines 26 and 27)	32,928,248	23,984,253	(8,943,995)

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. Other assets	676,858	757,262	80,404
2502.			
2503.			
2598. Summary of remaining write-ins for Line 25 from overflow page			
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)	676,858	757,262	80,404

## 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 Indiana, the accompanying financial statements of American Economy Insurance Company (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, *Investments in Subsidiary, Controlled and Affiliated Entities*, 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 2011.
13. The Company has no pharmaceutical rebate receivables.

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

- A. The Company adopted SSAP No. 35R, *Guaranty Fund and Other Assessments*, effective January 1, 2011. The cumulative effect of adopting SSAP No. 35R is reported in the Capital and Surplus Account and is not considered material.

The Company adopted SSAP No. 5R, *Liabilities, Contingencies and Impairments of Assets*, effective December 31, 2011. The adoption of SSAP No. 5R has no impact on the Company.

## NOTES TO FINANCIAL STATEMENTS

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

#### A. Statutory Purchase Method

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

#### 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 2011, 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 received for new mortgage loans during 2011 were 7.00% and 5.00%, respectively.
- (2) During 2011, the Company did not reduce interest rates of any outstanding mortgage loans.
- (3) The maximum loan to value of any loan written during 2011 was 75%.
- (4) No loans had interest more than 180 days past due.
- (5) There were \$1,546 in taxes, assessments or any amounts advanced and not included in the mortgage loan.
- (6) There was no recorded investment in impaired loans as of December 31, 2011.
- (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 2011.
- (9) There was no interest income recognized for impaired loans during 2011.
- (10) There was no interest income recognized on a cash basis for impaired loans during 2011.
- (11)
  - a) There was \$0 allowance for credit losses in 2011 and 2010.
  - b) There were \$0 additions to the allowance charged to operations in 2011, and \$22,150 in 2010.
  - c) There were \$0 direct write-downs charged against the allowance in 2011, and \$22,150 in 2010.
  - d) There were no recoveries of amounts previously charged off.
  - e) The balance in the allowance for credit losses was \$0 in 2011 and 2010.

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

#### B. Troubled Debt Restructuring for Creditors

- (1) There was \$5,578 of recorded investment in mortgage 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. Loan-Backed Securities

1. Prepayment speed assumptions are updated monthly with data sourced from the Bloomberg data service.
2. All Loan-Backed Securities with a recognized other-than-temporary impairment disclosed in the aggregate during 2011 as of December 31, 2011: None



## NOTES TO FINANCIAL STATEMENTS

3. Each Loan-Backed Security with a recognized other-than-temporary impairment held by the Company at December 31, 2011:

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
59023XAB2	463,616	405,530	58,086	405,530	406,130	3/31/2009
59023XAB2	304,430	264,229	40,201	264,229	210,340	12/31/2009
59023XAB2	250,379	216,661	33,718	216,661	173,560	12/31/2009
59023XAB2	195,487	190,655	4,832	190,655	155,328	3/31/2010
59023XAB2	161,922	158,021	3,901	158,021	125,395	3/31/2010
59023XAB2	314,745	302,668	12,077	302,668	279,755	9/30/2010
59023XAB2	138,481	137,021	1,460	137,021	94,984	9/30/2011
59023XAB2	101,208	98,118	3,090	98,118	76,680	9/30/2011
59023XAB2	126,390	115,922	10,468	115,922	91,878	12/31/2011
59023XAB2	90,535	81,192	9,343	81,192	74,173	12/31/2011
61749BAB9	483,844	459,588	24,257	459,588	295,000	12/31/2009
61749BAB9	298,907	191,503	107,404	191,503	238,152	12/31/2009
61749BAB9	404,245	400,674	3,571	400,674	326,903	3/31/2010
61749BAB9	162,702	159,819	2,883	159,819	263,907	3/31/2010
61749BAB9	326,309	324,728	1,581	324,728	301,732	12/31/2010

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, 2011:

	1	2
	Less Than 12 Months	12 Months or Longer
Gross Unrealized Loss	-	(400,413)
Fair Value of Securities with Unrealized Losses	-	3,123,782

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' surplus. 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

- The Company has not entered into any repurchase agreements during the year. Refer to Note 17B for the policy on requiring collateral related to securities lending.
- The Company has not pledged any of its assets as collateral as of December 31, 2011.
- Aggregate Amount of Contractually open cash collateral positions:

Aging of Collateral	Total Fair Value
Open	\$ 5,716,337
30 Days or Less	-
31 to 60 Days	-
61 to 90 Days	-
Greater than 90 Days	-
Sub-Total	5,716,337
Securities Received	-
Total Collateral Received	\$ 5,716,337

4. Securities Lending Transactions Administered by an Affiliated Agent

The Company's security lending transactions are not administered by an affiliate agent.

## NOTES TO FINANCIAL STATEMENTS

### 5. Collateral Reinvestment

#### a. Aggregate Amount Cash Collateral Reinvested

	Amortized Cost	Fair Value
Open	\$ -	\$ -
30 Days or Less	1,416,314	\$1,416,319
31 to 60 Days	2,795,769	2,795,818
61 to 90 Days	1,504,763	1,504,854
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	5,716,847	5,716,991
Securities Received	-	-
Total Collateral Reinvested	\$5,716,847	\$5,716,991

- b. The reporting entity's sources of cash that it uses to return the cash collateral is dependent on the liquidity of the current market conditions. Under current conditions, the reporting entity could liquidate all or a portion of its cash collateral reinvestment securities in order to meet the collateral calls that could come due under a worst-case scenario.

#### F. Real Estate

The Company does not hold any investments in 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, 2011.

### **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:

## NOTES TO FINANCIAL STATEMENTS

	December 31, 2011			December 31, 2010			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	61,256,869	1,769,131	63,026,000	60,535,200	2,119,950	62,655,150	721,669	(350,819)	370,850
Statutory Valuation Allowance Adjustment	-	-	-	-	-	-	-	-	-
Adjusted Gross Deferred Tax Assets	61,256,869	1,769,131	63,026,000	60,535,200	2,119,950	62,655,150	721,669	(350,819)	370,850
Deferred Tax Liabilities	(4,474,550)	(1,367,450)	(5,842,000)	(3,741,017)	(2,757,433)	(6,498,450)	(733,533)	1,389,983	656,450
Net DTA (DTL)	56,782,319	401,681	57,184,000	56,794,183	(637,483)	56,156,700	(11,864)	1,039,164	1,027,300
Deferred Tax Assets Nonadmitted	(28,799,889)	(401,681)	(29,201,570)	(20,741,104)	-	(20,741,104)	(8,058,785)	(401,681)	(8,460,466)
Net Admitted DTA (DTL)	27,982,430	-	27,982,430	36,053,079	(637,483)	35,415,596	(8,070,649)	637,483	(7,433,166)

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 Company does not utilize tax planning strategies.

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

	December 31, 2011			December 31, 2010			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.)	-	-	-	9,200,925	-	9,200,925	(9,200,925)	-	(9,200,925)
Lesser of:									
Expected to be recognized within one year (10bi.)	29,658,263	-	29,658,263	27,139,526	-	27,139,526	2,518,737	-	2,518,737
10% of adjusted capital and surplus (10bii.)			18,654,954			17,476,447			1,178,507
Adj. gross DTAs offset against existing DTLs (10c.)	4,474,550	1,367,450	5,842,000	3,741,017	2,757,433	6,498,450	733,533	(1,389,983)	(656,450)
Total	23,129,504	1,367,450	24,496,954	30,418,389	2,757,433	33,175,822	(7,288,885)	(1,389,983)	(8,678,868)

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

	December 31, 2011			December 31, 2010			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.)	-	-	-	9,200,925	-	9,200,925	(9,200,925)	-	(9,200,925)
Lesser of:									
Expected to be recognized within three years (10eii.)	40,071,250	-	40,071,250	38,195,408	-	38,195,408	1,875,842	-	1,875,842
15% of adjusted capital and surplus (10eib.)			27,982,430			26,214,671			1,767,759
Adj. gross DTAs offset against existing DTLs (10eiii.)	4,474,550	1,367,450	5,842,000	3,741,017	2,757,433	6,498,450	733,533	(1,389,983)	(656,450)
Total	32,456,980	1,367,450	33,824,430	39,156,613	2,757,433	41,914,046	(6,699,633)	(1,389,983)	(8,089,616)

	December 31, 2011		December 31, 2010		Change
	(1)	(2)	(3)	(4)	
Used in SSAP No. 10R, Paragraph 10.d.					
Total Adjusted Capital		224,702,556		227,548,017	(2,845,461)
Authorized Control Level		52,777,655		52,779,719	(52,779,719)

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

	December 31, 2011			December 31, 2010			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	18,654,954	-	18,654,954	27,314,855	(637,483)	26,677,372	(8,659,901)	637,483	(8,022,418)
Admitted Assets			1,258,902,172			1,247,925,741			
Adjusted Statutory Surplus*			186,549,536			174,764,474			
Total Adjusted Capital from DTAs	18,654,954	-	18,654,954	27,314,855	(637,483)	26,677,372	(8,659,901)	637,483	(8,022,418)

\*As reported on the statutory balance sheet for the most recently filed statement with the domiciliary state commissioner adjusted in accordance with SSAP No.10R, Paragraph 10bii

## NOTES TO FINANCIAL STATEMENTS

Increase due to SSAP No. 10R, Paragraph 10.e.	December 31, 2011			December 31, 2010			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	9,327,477	-	9,327,477	8,738,224	-	8,738,224	589,253	-	589,253
Admitted Assets	9,327,477	-	9,327,477	8,738,224	-	8,738,224	589,253	-	589,253
Adjusted Statutory Surplus	9,327,477	-	9,327,477	8,738,224	-	8,738,224	589,253	-	589,253

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:

	2011	2010
Federal	(2,034,622)	(5,539,360)
Foreign	-	-
Realized capital gains	706,622	4,848,660
Federal and foreign income taxes incurred	(1,328,000)	(690,700)

The Company's DTAs and DTLs result primarily from limits on unearned premium reserves, discounting of unpaid losses and LAE reserves, net operating loss carry-forward, and goodwill and intangibles.

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

	2011
Change in net deferred income tax (without unrealized gain or loss)	(656,884)
Change in tax effect of unrealized (gains) losses	1,684,184
Total change in net deferred income tax	1,027,300

D. Effective tax rates differ from the current statutory rate of 35% principally due to the effects of goodwill and intangibles, net operating loss generated in 2011, tax exempt interest, discounting of unpaid losses and LAE reserves, and unearned premium reserves.

E. The amount of Federal income taxes incurred and available for recoupment in the event of future losses is none from the current year and none from the preceding year.

The Company has net operating loss carry-forward available to offset future net income subject to Federal income taxes as follows:

Year Generated	Amount	Expiration
2011	18,623,000	2031

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:

Access Insurance Services, Co. (Dissolved 10/24/2011)	Liberty Mutual Holding Company Inc.
AMBCO Capital Corporation	Liberty Mutual Insurance Company
America First Insurance Company	Liberty Mutual Personal Insurance Company
America First Lloyds Insurance Company	Liberty Northwest Insurance Corporation
American Economy Insurance Company	Liberty Personal Insurance Company
American Fire & Casualty Company	Liberty RE (Bermuda) Limited
American States Insurance Company	Liberty Sponsored Insurance (Vermont) Inc.
American States Insurance Company of Texas	Liberty Surplus Insurance Corporation
American States Lloyds Insurance Company	LIH-RE of America Corporation
American States Preferred Insurance Company	LIU Specialty Insurance Agency Inc.
Barrier Ridge LLC	LM General Insurance Company
Berkeley Holding Company Associates, Inc.	LM Insurance Corporation
Berkeley Management Corporation	LM Property & Casualty Insurance Company
Bridgefield Casualty Insurance Company	LMHC Massachusetts Holdings Inc.
Bridgefield Employers Insurance Company	LRE Properties, Inc.
Capitol Court Corporation	Mid-American Fire & Casualty Company
Capitol Agency, Inc., The (Arizona corporation) (Dissolved 1/20/2011)	North Pacific Insurance Company
Cascade Disability Management, Inc.	OCASCO Budget, Inc.
Colorado Casualty Insurance Company	OCI Printing, Inc.
Commercial Aviation Insurance, Inc.	Ohio Casualty Corporation
Consolidated Insurance Company	Ohio Security Insurance Company
Copley Venture Capital, Inc.	Open Seas Solutions, Inc.
	Oregon Automobile Insurance Company

## NOTES TO FINANCIAL STATEMENTS

Diversified Settlements, Inc.	Peerless Indemnity Insurance Company
Emerald City Insurance Agency, Inc.	Peerless Insurance Company
Employers Insurance Company of Wausau	Pilot Insurance Services, Inc.
Excelsior Insurance Company	Rianoc Research Corporation
F.B. Beattie & Co., Inc.	S.C. Bellevue, Inc.
First National Insurance Company of America	SAFECARE Company, Inc.
First State Agency Inc.	Safeco Corporation
General America Corporation	Safeco General Agency, Inc.
General America Corporation of Texas	Safeco Insurance Company of America
General Insurance Company of America	Safeco Insurance Company of Illinois
Golden Eagle Insurance Corporation	Safeco Insurance Company of Indiana
Gulf States AIF, Inc.	Safeco Insurance Company of Oregon
Hawkeye-Security Insurance Company	Safeco Lloyds Insurance Company
Heritage-Summit HealthCare, Inc.	Safeco National Insurance Company
Indiana Insurance Company	Safeco Properties, Inc.
Insurance Company of Illinois	Safeco Surplus Lines Insurance Company
LEXCO Limited	San Diego Insurance Company
Liberty-USA Corporation	SCIT, Inc.
Liberty Assignment Corporation	St. James Insurance Company Ltd.
Liberty Energy Canada, Inc.	Summit Consulting, Inc.
Liberty Financial Services, Inc.	Summit Consulting, Inc. of Louisiana
Liberty Hospitality Group, Inc.	Summit Holding Southeast, Inc.
Liberty Insurance Corporation	The First Liberty Insurance Corporation
Liberty Insurance Holdings, Inc.	The Midwestern Indemnity Company
Liberty Insurance Underwriters Inc.*	The National Corporation
Liberty International Europe Inc.	The Netherlands Insurance Company
Liberty International Holdings Inc.	The Ohio Casualty Insurance Company
Liberty Life Assurance Company of Boston	Wausau Business Insurance Company
Liberty Life Holdings Inc.	Wausau General Insurance Company
Liberty Lloyds of Texas Insurance Company	Wausau Underwriters Insurance Company
Liberty Management Services, Inc.	West American Insurance Company
Liberty Mexico Holdings Inc.	Winmar Company, Inc.
Liberty Mutual Agency Corporation	Winmar of the Desert, Inc.
Liberty Mutual Fire Insurance Company	Winmar Oregon, Inc.
Liberty Mutual Group Asset Management Inc.**	Winmar-Metro, Inc.
Liberty Mutual Group Inc.	

\* Merged with and into LM Personal Insurance Company and LM Personal Insurance Company changed its name to Liberty Insurance Underwriters Inc. on January 3, 2011.

\*\* This company joined the consolidated group in 2011 and its activity from the date it joined the group is included in the consolidated return.

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”), an insurance holding 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. (“LMHC”), 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 2011.
- D. At December 31, 2011, the Company reported a net \$1,628,922 due to affiliates. In general, the terms of the intercompany arrangements require settlement at least quarterly.
- E. The Company has not made any guarantees or initiated any undertakings, written or otherwise, for the benefit of affiliates or other related parties.

## NOTES TO FINANCIAL STATEMENTS

- F. Refer to Note 26 for information regarding the Amended and Restated Reinsurance Pooling Agreement.

The Company is a party to a management services agreement (the "Agreement") with Peerless Insurance Company ("PIC"). 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 Asset Management Inc. ("LMGAM"), an investment management agreement with Liberty Mutual Investment Advisors LLC ("LMIA") and a cash management agreement with LMIA. Under these agreements, LMGAM and LMIA provide services to the Company.

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

The Company is a party to a revolving credit agreement under which the Company may borrow up to \$100,000,000 from LMIC. The purpose of the extension of credit is for operating liquidity to accommodate fluctuations in daily cash flow and to promote efficient management of investments. As of December 31, 2011, there have been no drawings under this agreement.

The Company is a party to an Amended and Restated Short Term Borrowing Agreement with Safeco Corporation and affiliates.

- 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.

- 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**

The Company does not have any direct employees and therefore, 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 10F.

### **Note 13 - Capital and Surplus, Shareholders' Dividend restrictions and Quasi-Reorganizations**

1. The Company has 1,000,000 shares authorized, issued and outstanding as of December 31, 2011. All shares have a stated par value of \$5.
2. Preferred Stock  
Not applicable
3. There are no dividend restrictions.
4. The Company did not pay any dividends to its parent during 2011.
5. The maximum amount of dividends which can be paid to shareholders by Indiana-domiciled insurance companies without the 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 which may be made without prior approval in 2012 is \$11,546,020.
6. As of December 31, 2011, the Company has restricted surplus of \$9,327,477 from recording the increase in admitted DTA's as a result of applying the revised guidance in SSAP No. 10R, *Income Taxes*, and pre-tax restricted surplus of \$1,177,256 resulting from retroactive reinsurance contracts.
7. The Company had no advances to surplus.

## NOTES TO FINANCIAL STATEMENTS

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 2011 and from the adoption of the revised guidance on calculating admitted DTA's in SSAP 10R.
10. The portion of unassigned funds (surplus) represented by cumulative net unrealized gains is \$18,398,973 after applicable deferred taxes of \$375,780.
11. Surplus Notes  
Not applicable
12. Quasi-reorganization (dollar impact)  
Not applicable
13. Quasi-reorganization (effective date)  
Not applicable

### **Note 14 - Contingencies**

#### A. Contingent Commitments

1. The Company has made no commitments or contingent commitments on behalf of affiliates.
2. The Company has made no guarantees on behalf of affiliates.

#### B. Assessments

The Company is subject to guaranty fund and other assessments by the states in which it writes business. Guaranty fund assessments and premium-based assessments are presumed probable when the premium on which the assessments are expected to be based are written. In the case of loss-based assessments, the event that obligates the entity is an entity incurring the losses on which the assessments are expected to be based.

The Company has accrued a liability for guaranty funds and other assessments of \$2,286,192 that is offset by future premium tax credits of \$293,823. Current assessments are expected to be paid out in the next two years, while premium tax offsets are expected to be realized in the next eleven years, beginning in 2012. During 2011 there were no material insolvencies to report. The Company continues to remit payments relating to prior year insolvencies.

Reconciliation of paid and accrued premium tax offsets and policy surcharges at prior year-end to current year-end:

a. Assets recognized from paid and accrued premium tax offsets and policy surcharges prior year-end	\$ 466,741
b. Decreases current year: Premium tax offset applied	172,918
c. Increases current year: Premium tax offset increase	-
d. Assets recognized from paid and accrued premium tax offsets and policy surcharges current year-end	\$ 293,823

#### 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	\$30,000

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 [ ]

## NOTES TO FINANCIAL STATEMENTS

### E. Product Warranties

The Company does not write product warranty business.

### F. All Other Contingencies

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") and Liberty Mutual Agency Corporation ("LMAC"). LMGI is the plan sponsor of the Liberty Mutual Retirement Benefit Plan, a qualified plan under federal law. LMAC is the Plan Sponsor of the Liberty Mutual Agency Corporation Retirement Benefit Plan, also 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, or LMAC has not made the minimum required contributions with respect to the Liberty Mutual Agency Corporation 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.

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>
2012	\$ 317,663	\$ 2,256,618
2013	317,663	2,248,285
2014	26,472	2,086,706
2015	-	1,626,915
2016	-	1,479,917
2017 & thereafter	-	1,823,485
<u>Total</u>	<u>\$ 661,797</u>	<u>\$ 11,521,926</u>

The amount of liability the Company recognized in its financial statements for lease agreements for which it is no longer using the leased property benefits is \$799,845.

#### 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. 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 collateral is unrestricted and 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, 2011 the total fair value of securities on loan was \$5,602,126, with corresponding collateral value of \$5,716,337 of which \$5,716,337 represents cash collateral.

#### C. Wash Sales

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



## NOTES TO FINANCIAL STATEMENTS

### **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 2011, the Company recorded net CEA administrative fees of \$64,133.

#### C. Medicare or Other Similarly Structured Cost Based Reimbursement Contracts

Not applicable

### **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, 2011:

1	2	3	4	5
Description	Level 1	Level 2	Level 3	Total
Assets at fair value				
Bonds				
Issuer Obligations	-	\$ 52,661,421	-	\$ 52,661,421
Residential Mortgage-Backed Securities	-	1,560,747	-	1,560,747
Total Bonds	-	\$ 54,222,168	-	\$ 54,222,168
Preferred Stocks				
Industrial and Miscellaneous (Unaffiliated)	-	\$ 5,296,800	-	\$ 5,296,800
Total Preferred Stocks	-	\$ 5,296,800	-	\$ 5,296,800
Common Stocks				
Industrial and Miscellaneous	\$ 44,718,866	-	\$ 229	\$ 44,719,095
Total Common Stocks	\$ 44,718,866	-	\$ 229	\$ 44,719,095
Total assets at fair value	\$ 44,718,866	\$ 59,518,968	\$ 229	\$104,238,063
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 period ended December 31, 2011.

## NOTES TO FINANCIAL STATEMENTS

### 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	8	9	10	11
	Balance at 12/31/2010	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	Settlements	Balance at 12/31/2011
Bonds	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Preferred Stock	-	-	-	-	-	-	-	-	-	-
Common Stock	229	-	-	-	-	-	-	-	-	229
Total	\$ 229	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 229

### 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.

## NOTES TO FINANCIAL STATEMENTS

### 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 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. Other Fair Value Disclosures

Not applicable

#### C. 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 \$ 40,387,797 and \$45,733,239 as of December 31, 2011 and 2010, respectively, were on deposit with government authorities or trustees as required by law.
- 2) Interrogatory 6.2

The Company employs industry recognized catastrophe modeling software to estimate the Probable Maximum Loss. For property exposures, the Company employs RiskLink v11.0 from RMS and AIR Clasic/2 v12.0. For workers' compensation, Liberty Mutual utilizes RiskLink v11.0 from RMS.

#### Interrogatory 6.3

In 2011, the Company ceded 100% of its business to Peerless Insurance Company and had the benefit, together with its affiliates that cede business to the Peerless Insurance Company or that are members of the intercompany reinsurance pool of which Peerless Insurance Company is the lead company, of traditional prop cat excess of loss reinsurance with limits of \$742,500,000 part of \$825,000,000 xs \$500,000,000 purchased by Peerless Insurance Company and covering Peerless' direct and assumed from affiliates property business.

## NOTES TO FINANCIAL STATEMENTS

- 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 and Non-transferable Tax Credits

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

<u>Description of State Transferable and Non-transferable Tax Credits</u>	<u>State</u>	<u>Carrying Value</u>	<u>Unused Amount</u>
Historical Rehabilitation Credit	CT	\$32,000	\$32,000
<b>Total</b>		<b>\$32,000</b>	<b>\$32,000</b>

- (2) Method of estimating utilization of remaining transferable and non-transferable state tax credits or other projected recovery of the current carrying value; and

The Company estimated the utilization of the remaining transferable and non-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 and non-transferable state tax credits

- (3) Impairment amount recognized by the reporting period, if any.

The Company has not recognized any impairment losses associate with its transferable and non-transferable state tax credits during the reporting period.

- (4) Identify state tax credit by transferable and non-transferable classification, and identify the admitted and nonadmitted portions of each classification.

<u>Description of State Transferable and Non-transferable Tax Credits</u>	<u>State</u>		<u>Transferable</u>	<u>Non-Transferable</u>
Historical Rehabilitation Credit	CT	Admitted	-	\$32,000
Historical Rehabilitation Credit	CT	Non Admitted	-	-
<b>Total</b>				<b>\$32,000</b>

G. Subprime-Mortgage-Related Risk Exposure

- The Company has not purchased securities characterized by the market as subprime. The Company looks at 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 acquisition of collateral assets at the termination of a securities lending agreement in 2008.
- The Company does not have any direct exposure through investments in subprime mortgage loans.
- The Company has direct exposure through their investment 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>
\$525,940	\$578,792	\$611,338	\$316,870

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

**Note 22 - Events Subsequent**

- B. The Company evaluated subsequent events through February 24, 2012, the date the financial statements were available to be issued.

There were no events subsequent to December 31, 2011 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.

## NOTES TO FINANCIAL STATEMENTS

### C. Reinsurance Assumed & Ceded

1. 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, 2011.

	Assumed Reinsurance		Ceded Reinsurance		Net Reinsurance	
	UEP	Commission Equity	UEP	Commission Equity	UEP	Commission Equity
Affiliates	\$ 282,190,835	\$ 42,328,625	\$ 124,843,138	\$ 18,726,471	\$ 157,347,697	\$ 23,602,154
All Other	-	-	-	-	-	-
Total	\$ 282,190,835	\$ 42,328,625	\$ 124,843,138	\$ 18,726,471	\$ 157,347,697	\$ 23,602,154

Direct Unearned Premium Reserve: \$ 124,843,138

2. 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, 2011 are as follows:

Description	Direct	Assumed	Ceded	Net
Contingent commissions	\$ -	\$ 15,615,489	\$ -	\$ 15,615,489
Sliding scale adjustments	-	-	-	-
Other profit commissions	-	-	-	-
Totals	\$ -	\$ 15,615,489	\$ -	\$ 15,615,489

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	\$ 26,589,730	-
2. Adjustments – Prior Year(s)	(21,247,272)	-
3. Adjustments – Current Year	(374,976)	-
4. Total	\$ 4,967,483	-
b. Consideration Paid or Received:		
1. Initial	\$ 21,880,453	-
2. Adjustments – Prior Year(s)	834,004	-
3. Adjustments – Current Year	-	-
4. Total	\$ 22,714,458	-
c. Amounts Recovered / Paid – Cumulative:		
1. Initial		
2. Adjustments – Prior Year(s)	\$ 26,907,228	-
3. Adjustments – Current Year	408,341	-
4. Total	\$ 27,315,570	-
d. Special Surplus from Retroactive Reinsurance:		
1. Initial Surplus Gain or Loss	\$ (5,529,040)	-
2. Adjustments – Prior Year(s)	(4,825,952)	-
3. Adjustments – Current Year	(33,366)	-
4. Current Year Special Surplus	1,177,256	-
5. Cumulative Total Transferred to Unassigned Funds	\$ (11,565,614)	-
e. All cedents and reinsurers included in the above transactions:		
Peerless Insurance Company	\$ 4,967,483	-
Total	\$ 4,967,483	-

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.

## NOTES TO FINANCIAL STATEMENTS

### 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, 2011.

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

The Company has not entered into any agreements which have been approved by their domiciliary regulator and have qualified pursuant to SSAP No. 62R, *Property and Casualty Reinsurance* to receive P&C Run-off Accounting Treatment.

### **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. Medical Loss Ratio Rebates

The Company does not recognize a liability for medical loss ratio rebates pursuant to the Public Health Service Act, as the Company does not write direct comprehensive major medical health business.

- E. 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 nonadmitted.

a.	Total accrued retro premium	\$ 287,288
b.	Unsecured amount	
c.	Less: Nonadmitted amount (10%)	28,701
d.	Less: Nonadmitted for any person for whom agents' balances or uncollected premiums are nonadmitted	
e.	Admitted amount (a) - (c) - (d)	\$ 258,587

### **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 \$16,413,887 during 2011. This decrease was primarily the result of updated reserving analysis and improving loss trends in the Commercial Multiple Peril \$7,014,266, Other Liability \$6,180,635, Fidelity/Surety \$4,969,619, and Private Passenger Auto Liability/Medical \$4,469,963 lines. This was partially offset by deteriorating loss trends in the Workers Compensation \$6,254,255 line. 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:

Lead Company:	Peerless Insurance Company ("PIC")	NAIC Company Number	Pooling Percentage	Line of Business
		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

## NOTES TO FINANCIAL STATEMENTS

	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%	Liberty Northwest Insurance Corporation ("LNW")	41939	0.00%	All Lines
Quota	North Pacific Insurance Company ("NPIC")	23892	0.00%	All Lines
Share	Oregon Automobile Insurance Company ("OAIC")	23922	0.00%	All Lines
Affiliated Companies:	Liberty Mutual Mid-Atlantic Insurance Company ("LMMAIC")	14486	0.00%	All Lines

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 of December 31, 2011:

Affiliate:	Amount:
Peerless Insurance Company	\$ (3,907,052)

### **Note 27 - Structured Settlements**

- A. As a result of purchased annuities with the claimant as payee, The Company no longer carries reserves of \$6,865,587 after applying Intercompany 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 \$6,865,587 as of December 31, 2011.
- 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:

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	2,759,990

### **Note 28 - Health Care Receivables**

Not applicable

## NOTES TO FINANCIAL STATEMENTS

### **Note 29 - Participating Policies**

Not applicable

### **Note 30 - Premium Deficiency Reserves**

1. Liability carried for premium deficiency reserves	\$ -
2. Date of the most recent evaluation of this liability	12/31/2011
3. Was anticipated investment income utilized in the calculation?	Yes

### **Note 31 - High Dollar Deductible Policies**

Not applicable

### **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, 2011 liabilities subject to discount were carried at a value representing a discount of \$7,439,028 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 that 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 reserves for anticipated losses and bulk reserves for claim adjustment expenses and incurred but not reported claims reserves ("IBNR"). The Company maintained casualty excess of loss reinsurance during the relevant periods. The reserves are reported net of cessions to 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 insureds 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 claims and claim 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. The 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 (e.g., Mississippi) have been favorable to defendants. Most importantly, several states have enacted and sustained 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.

In the third quarter of 2011, the Company completed ground-up asbestos and environmental reserve studies. The studies were completed by a multi-disciplined team of internal claims, legal, reinsurance and actuarial personnel, and they included all major segments of the Company's direct, assumed, and ceded asbestos and environmental claims. As part of the internal reviews, potential exposures of certain policyholders were individually evaluated using the Company's proprietary stochastic model, which is consistent with published actuarial papers 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. The studies resulted in an increase to reserves. Between comprehensive studies, the Company monitors asbestos and environmental activity to determine whether or not any adjustment to reserves is warranted.



## NOTES TO FINANCIAL STATEMENTS

### 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 on historical data and trends. As a result, the use of conventional reserving methodologies frequently has to be supplemented by subjective considerations 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 Company's future operating results and financial condition.

### 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 following tables summarize the activity for the Company's asbestos and environmental claims and claim adjustment expenses, a component of the Company's unpaid claims and claim adjustment expenses, for the years ended December 31, 2011, 2010, 2009, 2008, and 2007:

### Asbestos:

	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>
<b>Direct Basis</b>					
Beginning Reserves	9,602,925	9,059,318	9,373,412	8,769,607	7,891,529
Incurred losses and LAE	524,504	1,381,258	119,710	(726)	(1,589,005)
Calendar year payments	956,110	1,067,164	723,514	877,352	552,632
Ending Reserves	<u>9,171,319</u>	<u>9,373,412</u>	<u>8,769,608</u>	<u>7,891,529</u>	<u>5,749,892</u>

### **Assumed Reinsurance Basis**

Beginning Reserves	6,030,806	7,448,312	6,375,702	8,882,056	7,749,792
Incurred losses and LAE	1,716,140	(253,085)	3,151,647	(3,123)	1,374,022
Calendar year payments	577,787	819,526	645,293	1,129,141	529,491
Ending Reserves	<u>7,169,159</u>	<u>6,375,701</u>	<u>8,882,056</u>	<u>7,749,792</u>	<u>8,594,324</u>

### **Net of Ceded Reinsurance Basis**

Beginning Reserves	12,629,296	13,375,982	12,831,685	15,109,158	13,289,884
Incurred losses and LAE	1,852,870	674,364	3,558,408	7,110	(99,688)
Calendar year payments	1,277,100	1,218,661	1,280,936	1,826,384	1,574,613
Ending Reserves	<u>13,205,066</u>	<u>12,831,685</u>	<u>15,109,157</u>	<u>13,289,884</u>	<u>11,615,583</u>

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

Direct Basis	865,406
Assumed Reinsurance Basis	43,635
Net of Ceded Reinsurance Basis	448,071

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

Direct Basis	1,688,303
Assumed Reinsurance Basis	73,179
Net of Ceded Reinsurance Basis	1,139,958

### Environmental:

	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>
<b>Direct Basis</b>					
Beginning Reserves	10,951,297	10,412,279	8,895,424	7,577,425	6,782,633
Incurred losses and LAE	2,881,251	229,257	(386,129)	(40,526)	1,363,238
Calendar year payments	2,082,128	1,746,113	931,870	754,266	974,671
Ending Reserves	<u>11,750,420</u>	<u>8,895,423</u>	<u>7,577,425</u>	<u>6,782,633</u>	<u>7,171,199</u>

### **Assumed Reinsurance Basis**

Beginning Reserves	2,056,866	1,999,169	1,922,341	1,383,747	1,266,238
Incurred losses and LAE	30,043	112	(489,929)	25,470	(136,036)
Calendar year payments	52,450	76,940	48,665	142,979	157,799
Ending Reserves	<u>2,034,459</u>	<u>1,922,341</u>	<u>1,383,747</u>	<u>1,266,238</u>	<u>972,403</u>

### **Net of Ceded Reinsurance Basis**

Beginning Reserves	11,455,465	11,454,884	9,769,437	7,815,346	6,959,226
Incurred losses and LAE	3,179,006	(201,701)	(1,032,370)	4,355	(840)
Calendar year payments	1,766,778	1,483,746	921,721	860,475	(541,081)
Ending Reserves	<u>12,867,693</u>	<u>9,769,437</u>	<u>7,815,346</u>	<u>6,959,226</u>	<u>7,499,467</u>

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**NOTES TO FINANCIAL STATEMENTS**


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<b>Ending Reserves for Bulk + IBNR included above (Loss &amp; LAE)</b>	
Direct Basis	522,380
Assumed Reinsurance Basis	1,866
Net of Ceded Reinsurance Basis	437,248
<b>Ending Reserves for LAE included above (Case, Bulk &amp; IBNR)</b>	
Direct Basis	1,215,317
Assumed Reinsurance Basis	12,589
Net of Ceded Reinsurance Basis	1,111,252

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 Guaranty 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? \_\_\_\_\_ Indiana \_\_\_\_\_
- 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: \_\_\_\_\_ 04/18/2011 \_\_\_\_\_
- 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. \_\_\_\_\_ 12/31/2009 \_\_\_\_\_
- 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). \_\_\_\_\_ 06/29/2011 \_\_\_\_\_
- 3.4 By what department or departments?  
 Indiana Department of Insurance  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
- 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. \_\_\_\_\_ 0.00 %  
 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 related to the other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 17A of the 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 reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? Yes  No  N/A

10.6 If the response to 10.5 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?

Kristen M. Bessette, 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

12.11 Name of real estate holding company

12.12 Number of parcels involved

12.13 Total book/adjusted carrying value

	0
\$	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

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

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

14.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?

- 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  No

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

.....  
 .....  
 .....

14.2 Has the code of ethics for senior managers been amended? Yes  No

14.21 If the response to 14.2 is yes, provide information related to amendment(s).

In 2011, Code provisions were added for Registered Investment Adviser compliance, as a Liberty Mutual subsidiary obtained SEC approval as a Registered Investment Adviser. Several non-material Code changes were also made to clarify existing provisions.

.....  
 .....

## GENERAL INTERROGATORIES

14.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes [ ] No [X]

14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).

.....  
 .....  
 .....

15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance with a NAIC rating of 3 or below? Yes [ ] No [X]

15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount
0			0
0			0
0			0

## BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the board of directors or a subordinate thereof? Yes [X] No [ ]

17. Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof? Yes [X] No [ ]

18. Has the reporting entity an established procedure for disclosure to its board of directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict or is likely to conflict with the official duties of such person? Yes [X] No [ ]

## FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? Yes [ ] No [X]

20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):

20.11 To directors or other officers	\$	0
20.12 To stockholders not officers	\$	0
20.13 Trustees, supreme or grand (Fraternal only)	\$	0

20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):

20.21 To directors or other officers	\$	0
20.22 To stockholders not officers	\$	0
20.23 Trustees, supreme or grand (Fraternal only)	\$	0

21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reported in the statement? Yes [ ] No [X]

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

21.21 Rented from others	\$	0
21.22 Borrowed from others	\$	0
21.23 Leased from others	\$	0
21.24 Other	\$	0

22.1 Does this statement include payments for assessments as described in the Annual Statement Instructions other than guaranty fund or guaranty association assessments? Yes [ ] No [X]

22.2 If answer is yes:

22.21 Amount paid as losses or risk adjustment	\$	0
22.22 Amount paid as expenses	\$	0
22.23 Other amounts paid	\$	0

## GENERAL INTERROGATORIES

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

### INVESTMENT

- 24.1 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 24.3) Yes  No
- 24.2 If no, give full and complete information, relating thereto:  
 .....  
 .....  
 .....
- 24.3 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 .....  
 .....  
 .....
- 24.4 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
- 24.5 If answer to 24.4 is yes, report amount of collateral for conforming programs. \$ 5,716,337
- 24.6 If answer to 24.4 is no, report amount of collateral for other programs. \$ 0
- 24.7 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
- 24.8 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? Yes  No  N/A
- 24.9 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities Lending Agreement (MSLA) to conduct securities lending? Yes  No  N/A
- 25.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 21.1 and 24.3). Yes  No

- 25.2 If yes, state the amount thereof at December 31 of the current year:
- |  |       |  |                      |
|--|-------|--|----------------------|
|  | 25.21 | Subject to repurchase agreements                 | \$ <u>0</u>          |
|  | 25.22 | Subject to reverse repurchase agreements         | \$ <u>0</u>          |
|  | 25.23 | Subject to dollar repurchase agreements          | \$ <u>0</u>          |
|  | 25.24 | Subject to reverse dollar repurchase agreements  | \$ <u>0</u>          |
|  | 25.25 | Pledged as collateral                            | \$ <u>0</u>          |
|  | 25.26 | Placed under option agreements                   | \$ <u>0</u>          |
|  | 25.27 | Letter stock or securities restricted as to sale | \$ <u>0</u>          |
|  | 25.28 | On deposit with state or other regulatory body   | \$ <u>40,387,797</u> |
|  | 25.29 | Other  | \$ <u>0</u>          |

25.3 For category (25.27) provide the following:

1 Nature of Restriction	2 Description	3 Amount
.....	.....	0
.....	.....	0
.....	.....	0

- 26.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes  No
- 26.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes  No  N/A   
 If no, attach a description with this statement.

## GENERAL INTERROGATORIES

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

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

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

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

1 Name of Custodian(s)	2 Custodian's Address
JP Morgan Chase	1 Chase Manhattan Plaza, New York, NY 10005
Bank of New York	601 Travis Street, Houston, TX 77002

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

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

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

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

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

28.05 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	3 Address
N/A	Liberty Mutual Investment Advisors, LLC	175 Berkeley Street, Boston, MA 02116
N/A	Liberty Mutual Group Asset Managemen	175 Berkeley Street, Boston, MA 02116
N/A	Stancorp Mortgage Investors	1100 SW Sixth Avenue, Portland, OR 97204

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

29.2 If yes, complete the following schedule:

1 CUSIP #	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
		0
		0
		0
29.2999 TOTAL		0



## GENERAL INTERROGATORIES

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

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holding	4 Date of Valuation
.....	.....	0	.....
.....	.....	0	.....
.....	.....	0	.....

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

	1 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
30.1 Bonds	888,731,844	929,651,585	40,919,741
30.2 Preferred stocks	12,046,800	12,289,800	243,000
30.3 Totals	900,778,644	941,941,385	41,162,741

30.4 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.

.....

.....

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

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

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

.....

.....

.....

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

32.2 If no, list exceptions:

.....

.....

.....

### OTHER

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

33.2 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

34.1 Amount of payments for legal expenses, if any? \$ \_\_\_\_\_ 118,022

## 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 payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
.....	\$ ..... 0
.....	\$ ..... 0
.....	\$ ..... 0

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

\$ 28,673

35.2 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 [ ] No [X]

1.2 If yes, indicate premium earned on U.S. business only. \$ 0

1.3 What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit? \$ 0

1.31 Reason for excluding

.....

.....

.....

1.4 Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above. \$ 0

1.5 Indicate total incurred claims on all Medicare Supplement insurance. \$ 0

1.6 Individual policies:

Most current three years:

1.61 Total premium earned \$ 0

1.62 Total incurred claims \$ 0

1.63 Number of covered lives 0

All years prior to most current three years:

1.64 Total premium earned \$ 0

1.65 Total incurred claims \$ 0

1.66 Number of covered lives 0

1.7 Group policies:

Most current three years:

1.71 Total premium earned \$ 0

1.72 Total incurred claims \$ 0

1.73 Number of covered lives 0

All years prior to most current three years:

1.74 Total premium earned \$ 0

1.75 Total incurred claims \$ 0

1.76 Number of covered lives 0

2. Health Test:

	1	2	
	Current Year	Prior Year	
2.1 Premium Numerator	\$ <u>0</u>	\$ <u>0</u>	
2.2 Premium Denominator	\$ <u>586,389,471</u>	\$ <u>577,594,080</u>	
2.3 Premium Ratio (2.1/2.2)	<u>0.00</u>	<u>0.00</u>	
2.4 Reserve Numerator	\$ <u>2,945,794</u>	\$ <u>2,822,133</u>	
2.5 Reserve Denominator	\$ <u>936,296,362</u>	\$ <u>917,743,171</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 [X] No [ ]

3.2 If yes, state the amount of calendar year premiums written on:

3.21 Participating policies \$ 68,011

3.22 Non-participating policies \$ 257,813,426

4. For Mutual reporting entities and Reciprocal Exchanges only:

4.1 Does the reporting entity issue assessable policies? Yes [ ] No [X]

4.2 Does the reporting entity issue non-assessable policies? Yes [ ] No [X]

4.3 If assessable policies are issued, what is the extent of the contingent liability of the policyholders? 0 %

4.4 Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums. \$ 0

5. For Reciprocal Exchanges Only:

5.1 Does the exchange appoint local agents? Yes [ ] No [X]

5.2 If yes, is the commission paid:

5.21 Out of Attorney's-in-fact compensation Yes [ ] No [ ] N/A [X]

5.22 As a direct expense of the exchange Yes [ ] No [ ] N/A [X]

5.3 What expenses of the Exchange are not paid out of the compensation of the Attorney-in-fact?

.....

.....

.....

5.4 Has any Attorney-in-fact compensation, contingent on fulfillment of certain conditions, been deferred? Yes [ ] No [X]

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:  
 In 2011, the Company was a member of an intercompany reinsurance pooling arrangement where it ceded its business to Peerless Insurance Company.

.....

.....

## 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:  
See Note 21C
- 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  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 unreinsured 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
- 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
- 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
- 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
- 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
- 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 31 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
- 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   
(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   
(c) The entity has no external cessions and only participates in an intercompany pool and the affiliated or lead company has filed an attestation supplement. Yes  No

## 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   |  | \$ | 19,185,967 |
| 12.12 Unpaid underwriting expenses (including loss adjustment expenses) |  | \$ | 1,784,723  |
- 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? \$ 238,672
- 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 |  |  | 0.00 % |
| 12.42 To   |  |  | 9.00 % |
- 12.5 Are letters of credit or collateral and other funds received from insureds being utilized by the reporting entity to secure premium notes or promissory notes taken by a reporting entity or to secure any of the reporting entity's reported direct unpaid loss reserves, including unpaid losses under loss deductible features of commercial policies? Yes  No
- 12.6 If yes, state the amount thereof at December 31 of current year:
- |                                  |  |    |            |
|----------------------------------|--|----|------------|
| 12.61 Letters of Credit          |  | \$ | 44,475,845 |
| 12.62 Collateral and other funds |  | \$ | 9,973,980  |
- 13.1 Largest net aggregate amount insured in any one risk (excluding workers' compensation): \$ 26,171,400
- 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	\$	0	\$	0	\$	0	\$	0	\$	0
16.12 Products	\$	0	\$	0	\$	0	\$	0	\$	0
16.13 Automobile	\$	0	\$	0	\$	0	\$	0	\$	0
16.14 Other*	\$	0	\$	0	\$	0	\$	0	\$	0

\* Disclose type of coverage: \_\_\_\_\_

## 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
	2011	2010	2009	2008	2007
<b>Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 &amp; 3)</b>					
1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4)	289,079,207	299,767,266	332,500,572	394,970,745	429,844,796
2. Property lines (Lines 1, 2, 9, 12, 21 & 26)	128,936,701	130,081,032	113,156,000	210,796,889	220,383,079
3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	393,281,799	404,835,684	414,300,152	474,783,174	513,612,001
4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	42,049,786	41,118,773	31,312,118	63,282,456	54,846,029
5. Nonproportional reinsurance lines (Lines 31, 32 & 33)			6	1,494	154
6. Total (Line 35)	853,347,493	875,802,755	891,268,848	1,143,834,758	1,218,686,059
<b>Net Premiums Written (Page 8, Part 1B, Col. 6)</b>					
7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4)	234,996,927	240,841,871	263,590,913	311,601,546	338,393,068
8. Property lines (Lines 1, 2, 9, 12, 21 & 26)	115,852,756	115,787,634	96,481,947	189,051,399	196,561,714
9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	202,678,479	192,858,902	175,461,076	183,947,163	202,298,091
10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	41,937,895	40,910,648	31,176,766	63,131,763	54,607,233
11. Nonproportional reinsurance lines (Lines 31, 32 & 33)			6	1,494	154
12. Total (Line 35)	595,466,057	590,399,055	566,710,708	747,733,365	791,860,260
<b>Statement of Income (Page 4)</b>					
13. Net underwriting gain (loss) (Line 8)	(36,235,187)	(8,300,206)	24,641,393	20,621,541	50,847,554
14. Net investment gain (loss) (Line 11)	43,001,081	55,567,565	54,905,121	49,634,935	66,272,024
15. Total other income (Line 15)	1,805,333	(4,569,508)	(1,000,114)	1,257,861	2,485,590
16. Dividends to policyholders (Line 17)	1,177,584	(197,359)	2,510,199	930,371	664,240
17. Federal and foreign income taxes incurred (Line 19)	(2,034,622)	(5,539,360)	13,760,528	8,355,046	21,028,924
18. Net income (Line 20)	9,428,265	48,434,570	62,275,673	62,228,920	97,912,004
<b>Balance Sheet Lines (Pages 2 and 3)</b>					
19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3)	1,268,229,649	1,256,663,965	1,546,119,817	1,438,460,340	1,525,338,883
20. Premiums and considerations (Page 2, Col. 3)					
20.1 In course of collection (Line 15.1)	22,440,194	20,102,764	22,186,815	69,671,737	95,385,921
20.2 Deferred and not yet due (Line 15.2)	168,865,110	161,676,876	157,537,260	117,162,078	103,485,496
20.3 Accrued retrospective premiums (Line 15.3)	258,587	513,008	914,463	326,924	285,225
21. Total liabilities excluding protected cell business (Page 3, Line 26)	1,034,199,616	1,020,377,724	1,037,489,151	1,129,311,330	1,125,004,856
22. Losses (Page 3, Line 1)	504,804,800	500,110,560	526,416,697	542,818,524	534,861,501
23. Loss adjustment expenses (Page 3, Line 3)	111,621,344	111,617,900	125,330,551	126,537,370	127,344,417
24. Unearned premiums (Page 3, Line 9)	282,190,835	271,776,831	257,663,511	282,825,872	309,075,031
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)	234,030,033	236,286,241	508,630,666	309,149,010	400,334,027
<b>Cash Flow (Page 5)</b>					
27. Net cash from operations (Line 11)	27,601,230	7,873,197	(27,884,070)	60,737,162	104,313,556
<b>Risk-Based Capital Analysis</b>					
28. Total adjusted capital	234,030,033	236,286,241	508,630,666	309,149,010	400,334,027
29. Authorized control level risk-based capital	52,781,863	52,785,350	53,190,943	64,309,664	69,011,838
<b>Percentage Distribution of Cash, Cash Equivalents and Invested Assets</b> (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0					
30. Bonds (Line 1)	84.0	86.7	90.1	85.3	82.3
31. Stocks (Lines 2.1 & 2.2)	7.9	7.4	4.7	4.9	15.5
32. Mortgage loans on real estate (Lines 3.1 and 3.2)	2.7	2.7	0.8		
33. Real estate (Lines 4.1, 4.2 & 4.3)					
34. Cash, cash equivalents and short-term investments (Line 5)	4.3	2.0	4.4	9.8	2.2
35. Contract loans (Line 6)					
36. Derivatives (Line 7)			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)	0.5	0.1		0.0	0.0
39. Securities lending reinvested collateral assets (Line 10)	0.6	1.1	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
<b>Investments in Parent, Subsidiaries and Affiliates</b>					
42. Affiliated bonds, (Sch. D, Summary, Line 12, Col. 1)					
43. Affiliated preferred stocks (Sch. D, Summary, Line 18, Col. 1)					
44. Affiliated common stocks (Sch. D, Summary, Line 24, Col. 1)	23,426,337	22,830,898	22,292,911	21,443,102	20,390,000
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	23,426,337	22,830,898	22,292,911	21,443,102	20,390,000
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)	10.0	9.7	4.4	6.9	5.1

## FIVE – YEAR HISTORICAL DATA

(Continued)

	1	2	3	4	5
	2011	2010	2009	2008	2007
<b>Capital and Surplus Accounts (Page 4)</b>					
50. Net unrealized capital gains (losses) (Line 24)	(2,532,332)	123,335	8,660,867	(31,019,580)	3,531,864
51. Dividends to stockholders (Line 35)		(169,397,479)	(7,200,000)	(107,000,000)	(230,000,000)
52. Change in surplus as regards policyholders for the year (Line 38)	(2,256,208)	(272,344,425)	199,481,657	(91,185,018)	(128,455,407)
<b>Gross Losses Paid (Page 9, Part 2, Cols. 1 &amp; 2)</b>					
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)	182,365,848	217,623,910	169,620,389	223,057,047	247,240,908
54. Property lines (Lines 1, 2, 9, 12, 21 & 26)	72,512,590	65,274,612	73,967,460	118,786,260	120,152,576
55. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	259,629,589	227,177,703	257,642,083	305,288,115	233,742,938
56. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	10,564,281	8,093,426	4,247,266	3,221,631	(356,777)
57. Nonproportional reinsurance lines (Lines 31, 32 & 33)	441,590	1,199,015	17,313,736	2,957,848	1,943,449
58. Total (Line 35)	525,513,898	519,368,666	522,790,934	653,310,901	602,723,094
<b>Net Losses Paid (Page 9, Part 2, Col. 4)</b>					
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)	142,251,591	178,524,293	138,920,821	178,794,687	204,802,544
60. Property lines (Lines 1, 2, 9, 12, 21 & 26)	65,741,280	59,334,100	66,541,304	107,519,503	109,017,276
61. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	139,087,916	102,785,011	86,907,266	122,493,601	94,014,082
62. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	10,571,104	8,095,426	4,270,810	3,193,579	(438,537)
63. Nonproportional reinsurance lines (Lines 31, 32 & 33)	441,590	1,199,015	17,300,068	2,957,848	1,943,449
64. Total (Line 35)	358,093,481	349,937,845	313,940,269	414,959,218	409,338,814
<b>Operating Percentages (Page 4)</b> (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)	61.9	56.0	50.7	55.5	53.1
67. Loss expenses incurred (Line 3)	12.1	11.8	11.9	11.5	9.7
68. Other underwriting expenses incurred (Line 4)	32.2	33.6	33.2	30.3	30.7
69. Net underwriting gain (loss) (Line 8)	(6.2)	(1.4)	4.2	2.7	6.5
<b>Other Percentages</b>					
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)	31.4	33.6	34.6	31.2	30.0
71. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0)	73.9	67.8	62.6	67.0	62.9
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)	254.4	249.9	111.4	241.9	197.8
<b>One Year Loss Development (000 omitted)</b>					
73. Development in estimated losses and loss expenses incurred prior to current year (Schedule P, Part 2-Summary, Line 12, Col. 11)	(15,777)	(6,792)	(43,196)	(21,805)	(20,569)
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)	(6.7)	(1.3)	(14.0)	(5.4)	(3.9)
<b>Two Year Loss Development (000 omitted)</b>					
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)	(14,158)	(34,526)	(62,244)	(31,290)	(43,138)
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)	(2.8)	(11.2)	(15.5)	(5.9)	(8.6)

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 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded			
1. Prior	X X X	X X X	X X X	13,841	1,644	1,914	103	740	158	186	14,590	X X X
2. 2002	510,542	50,190	460,352	281,782	28,163	21,346	2,005	36,178	1,829	16,574	307,309	X X X
3. 2003	557,381	46,552	510,829	272,995	23,897	19,186	1,399	40,886	1,941	17,061	305,830	X X X
4. 2004	599,833	33,095	566,738	280,056	11,378	17,632	629	40,091	853	21,119	324,919	X X X
5. 2005	624,890	25,310	599,580	286,427	11,611	18,436	675	42,069	660	20,186	333,986	X X X
6. 2006	624,062	27,871	596,191	287,977	6,528	18,151	785	42,628	953	17,620	340,490	X X X
7. 2007	636,961	31,108	605,853	289,747	6,380	17,594	661	42,356	600	18,973	342,056	X X X
8. 2008	635,709	23,634	612,075	316,822	9,651	16,245	698	46,946	492	16,677	369,172	X X X
9. 2009	596,434	37,301	559,133	252,854	16,557	10,418	790	41,195	356	14,888	286,764	X X X
10. 2010	589,515	11,921	577,594	232,239	1,590	6,482	61	43,641	83	14,989	280,628	X X X
11. 2011	597,228	10,838	586,390	202,288	719	2,640	24	34,322	67	11,353	238,440	X X X
12. Totals	X X X	X X X	X X X	2,717,028	118,118	150,044	7,830	411,052	7,992	169,626	3,144,184	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 Direct and Assumed	14 Ceded	15 Direct and Assumed	16 Ceded	17 Direct and Assumed	18 Ceded	19 Direct and Assumed	20 Ceded	21 Direct and Assumed	22 Ceded			
1. Prior	68,149	23,813	33,705	4,937	2,297	526	6,557	782	5,524	1	1,605	86,173	X X X
2. 2002	12,205	1,904	1,583	661	139	12	471	41	533		11	12,313	X X X
3. 2003	4,533	679	2,228	310	97	1	900	34	432		246	7,166	X X X
4. 2004	5,650	1,393	3,147	383	150	1	898	44	575		1,040	8,599	X X X
5. 2005	6,979	772	3,631	534	212	1	1,749	64	732		1,246	11,932	X X X
6. 2006	10,803	1,434	3,684	542	338	1	2,439	116	1,081		3,362	16,252	X X X
7. 2007	18,225	859	6,659	1,339	587	1	3,262	260	1,690		1,231	27,964	X X X
8. 2008	25,366	555	12,843	2,552	1,035	7	6,585	306	3,110		4,045	45,519	X X X
9. 2009	39,877	840	22,527	2,363	1,242	36	9,816	389	4,734		4,224	74,568	X X X
10. 2010	58,616	536	34,520	2,269	1,367	11	15,324	564	8,214		6,995	114,661	X X X
11. 2011	94,000	470	86,098	1,078	1,121	1	18,339	104	13,601	230	11,749	211,276	X X X
12. Totals	344,403	33,255	210,625	16,968	8,585	598	66,340	2,704	40,226	231	35,754	616,423	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 Direct and Assumed	27 Ceded	28 Net	29 Direct and Assumed	30 Ceded	31 Net	32 Loss	33 Loss Expense		35 Losses Unpaid	36 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	73,104	13,069
2. 2002	354,237	34,615	319,622	69,384	68,968	69,430			5.600	11,223	1,090
3. 2003	341,257	28,261	312,996	61,225	60,708	61,272			5.600	5,772	1,394
4. 2004	348,199	14,681	333,518	58,049	44,360	58,849			5.600	7,021	1,578
5. 2005	360,235	14,317	345,918	57,648	56,567	57,693			5.600	9,304	2,628
6. 2006	367,101	10,359	356,742	58,824	37,168	59,837			5.600	12,511	3,741
7. 2007	380,120	10,100	370,020	59,677	32,468	61,074			5.600	22,686	5,278
8. 2008	428,952	14,261	414,691	67,476	60,341	67,752			5.600	35,102	10,417
9. 2009	382,663	21,331	361,332	64,158	57,186	64,624			5.600	59,201	15,367
10. 2010	400,403	5,114	395,289	67,921	42,899	68,437			5.600	90,331	24,330
11. 2011	452,409	2,693	449,716	75,751	24,848	76,692			5.600	178,550	32,726
12. Totals	X X X	X X X	X X X	X X X	X X X	X X X			X X X	504,805	111,618

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	
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	One Year	Two Year	
1. Prior	293,133	313,248	316,489	326,270	330,207	333,774	326,850	341,897	349,234	349,470	236	7,573	
2. 2002	294,787	293,283	290,633	284,489	283,462	281,167	279,281	280,995	280,937	285,108	4,171	4,113	
3. 2003	X X X	290,345	285,024	277,923	276,486	278,395	276,254	275,244	274,133	273,891	(242)	(1,353)	
4. 2004	X X X	X X X	326,526	318,604	314,456	300,775	298,945	295,496	294,697	294,024	(673)	(1,472)	
5. 2005	X X X	X X X	X X X	340,738	327,774	311,569	309,585	305,813	304,992	304,067	(925)	(1,746)	
6. 2006	X X X	X X X	X X X	X X X	335,339	328,499	319,920	312,769	313,793	314,331	538	1,562	
7. 2007	X X X	X X X	X X X	X X X	X X X	359,438	349,904	328,027	327,856	326,956	(900)	(1,071)	
8. 2008	X X X	X X X	X X X	X X X	X X X	X X X	389,046	371,351	369,899	365,570	(4,329)	(5,781)	
9. 2009	X X X	X X X	X X X	X X X	X X X	X X X	X X X	332,114	321,646	316,131	(5,515)	(15,983)	
10. 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	351,997	343,858	(8,139)	X X X	
11. 2011	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	402,257	X X X	X X X	
											12. Totals	(15,778)	(14,158)

**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
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011		
1. Prior	000	87,003	141,135	176,115	199,836	216,511	230,660	239,702	250,390	264,398	X X X	X X X
2. 2002	134,342	196,655	226,324	247,053	257,651	263,786	267,666	269,759	271,998	272,960	X X X	X X X
3. 2003	X X X	135,563	195,216	223,816	242,473	255,069	260,568	263,879	265,667	266,885	X X X	X X X
4. 2004	X X X	X X X	140,654	211,232	244,150	263,702	275,251	280,959	283,697	285,680	X X X	X X X
5. 2005	X X X	X X X	X X X	143,995	213,806	247,234	268,960	282,569	289,152	292,576	X X X	X X X
6. 2006	X X X	X X X	X X X	X X X	146,648	217,874	248,889	273,931	289,403	298,815	X X X	X X X
7. 2007	X X X	X X X	X X X	X X X	X X X	152,389	226,351	260,333	284,960	300,299	X X X	X X X
8. 2008	X X X	X X X	X X X	X X X	X X X	X X X	176,692	261,277	298,117	322,718	X X X	X X X
9. 2009	X X X	X X X	X X X	X X X	X X X	X X X	X X X	147,585	213,909	245,924	X X X	X X X
10. 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	162,100	237,071	X X X	X X X
11. 2011	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	204,184	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
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
1. Prior	111,630	89,321	68,402	58,758	53,229	45,317	43,720	47,290	48,244	38,680
2. 2002	89,523	45,510	25,905	14,965	10,979	7,442	4,932	4,562	2,716	1,721
3. 2003	X X X	81,188	40,431	23,122	16,012	11,653	8,539	5,802	3,680	3,055
4. 2004	X X X	X X X	101,937	50,729	33,498	18,060	13,281	7,185	5,273	3,938
5. 2005	X X X	X X X	X X X	113,871	56,628	28,633	17,753	10,111	6,976	5,072
6. 2006	X X X	X X X	X X X	X X X	102,708	51,707	31,523	15,182	8,622	5,809
7. 2007	X X X	X X X	X X X	X X X	X X X	106,186	55,392	26,100	14,198	8,705
8. 2008	X X X	X X X	X X X	X X X	X X X	X X X	115,461	50,800	30,306	17,014
9. 2009	X X X	X X X	X X X	X X X	X X X	X X X	X X X	101,212	51,250	29,963
10. 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	99,942	47,350
11. 2011	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	103,424

## SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN Allocated By States and Territories

States, Etc.	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							
1. Alabama	AL	L	4,428,285	5,062,076	4,210,336	3,308,732	3,336,349	53,987	446
2. Alaska	AK	L	116,712	150,124	34,347	66,823	131,298	1,423	
3. Arizona	AZ	L	1,883,809	2,009,321	2,340,674	1,195,718	3,032,494	22,966	
4. Arkansas	AR	L	911,929	1,000,446	272,189	484,548	758,547	11,118	
5. California	CA	L	59,610,310	63,632,557	27,415,074	19,841,759	42,853,551	726,733	
6. Colorado	CO	L	4,719,543	4,838,487	2,424,286	2,656,521	4,549,176	57,538	
7. Connecticut	CT	L	6,593,689	7,300,114	6,732,518	6,648,391	14,554,122	80,386	
8. Delaware	DE	L	7,890	7,953	12,291	17,232	7,265	96	
9. District of Columbia	DC	L	133,111	175,713	81,934	520,666	490,408	1,623	
10. Florida	FL	L	30,685,466	31,899,576	8,296,399	7,964,890	15,479,833	374,099	
11. Georgia	GA	L	4,581,002	5,887,808	3,847,170	5,668,687	14,768,504	55,849	
12. Hawaii	HI	L							
13. Idaho	ID	L	3,557,297	3,644,505	1,157,285	2,482,498	3,664,766	43,368	
14. Illinois	IL	L	10,152,723	12,002,730	9,188,994	7,383,284	19,928,459	123,776	
15. Indiana	IN	L	2,262,153	2,305,245	3,339,596	8,879,028	14,362,123	27,579	
16. Iowa	IA	L	399,957	421,922	148,007	128,606	108,128	4,876	
17. Kansas	KS	L	1,911,986	2,032,925	1,056,795	923,182	844,260	23,310	
18. Kentucky	KY	L	1,150,759	1,216,729	569,955	75,872	1,534,371	14,029	
19. Louisiana	LA	L	4,741,625	4,727,512	1,800,514	3,269,986	4,834,816	57,807	
20. Maine	ME	L	9,820	12,028		(1,011)	751	120	
21. Maryland	MD	L	995,845	1,083,021	739,490	541,079	5,190,964	12,141	
22. Massachusetts	MA	L	1,052,255	1,183,652	554,361	919,979	1,807,192	12,828	
23. Michigan	MI	L	2,639,390	3,125,751	6,270,640	2,154,853	17,877,679	32,178	
24. Minnesota	MN	L	2,808,298	3,014,489	1,724,155	1,207,388	7,681,790	34,237	
25. Mississippi	MS	L	1,872,943	2,157,603	822,590	837,460	1,354,408	22,834	
26. Missouri	MO	L	5,614,717	5,718,568	9,779,279	15,273,688	9,725,899	68,451	
27. Montana	MT	L	4,128,610	4,656,614	3,162,200	1,473,400	2,991,353	50,334	
28. Nebraska	NE	L	449,234	474,290	320,435	433,786	278,537	5,477	
29. Nevada	NV	L	1,969,779	2,148,524	649,844	961,648	2,039,209	24,014	
30. New Hampshire	NH	L	156,379	199,831	73,074	22,029	226,382	1,906	
31. New Jersey	NJ	N	555	47			5,000	7	
32. New Mexico	NM	L	1,767,654	1,860,209	582,175	847,842	1,365,942	21,550	
33. New York	NY	L	6,650,812	7,493,221	6,164,605	7,582,335	19,019,412	81,083	1,114
34. North Carolina	NC	L	693,563	748,018	605,005	1,129,753	1,646,621	8,456	
35. North Dakota	ND	L	799,650	783,780	488,268	256,930	300,416	9,749	
36. Ohio	OH	L	1,426,644	1,585,898	1,313,066	679,131	1,716,504	17,393	
37. Oklahoma	OK	L	2,630,294	2,479,069	2,940,211	2,515,355	1,197,544	32,067	
38. Oregon	OR	L	13,561,769	13,509,199	7,896,115	2,163,420	15,886,359	165,337	
39. Pennsylvania	PA	L	2,383,050	2,734,996	2,261,340	2,650,830	9,840,974	29,053	
40. Rhode Island	RI	L	281,920	272,128	42,236	184,426	431,747	3,437	
41. South Carolina	SC	L	1,956,769	2,149,340	1,025,926	909,691	2,156,459	23,856	
42. South Dakota	SD	L	1,847,513	1,866,968	663,055	880,660	1,591,484	22,524	
43. Tennessee	TN	L	2,259,548	2,540,827	1,936,589	2,261,346	1,677,307	27,547	
44. Texas	TX	L	22,975,204	25,046,235	22,366,005	19,547,968	25,031,771	280,100	
45. Utah	UT	L	2,269,400	2,412,706	982,747	1,607,529	2,014,190	27,667	
46. Vermont	VT	L	65,519	80,438	110,841	(25,827)	211,659	799	
47. Virginia	VA	L	1,795,862	1,882,342	937,972	545,110	1,801,327	21,894	
48. Washington	WA	L	32,182,680	33,112,112	18,536,758	16,900,635	30,266,984	392,352	
49. West Virginia	WV	L	629,941	632,878	126,251	58,799	371,994	7,680	
50. Wisconsin	WI	L	510,880	553,209	423,709	446,410	2,400,201	6,228	
51. Wyoming	WY	L	1,646,700	1,665,565	993,119	1,229,861	1,698,438	20,076	
52. American Samoa	AS	N							
53. Guam	GU	N							
54. Puerto Rico	PR	N							
55. U.S. Virgin Islands	VI	N							
56. Northern Mariana Islands	MP	N							
57. Canada	CN	N							
58. Aggregate Other Alien	OT	X X X							
59. Totals	(a) 50		257,881,443	275,499,299	167,420,425	157,712,926	315,044,967	3,143,938	1,560

DETAILS OF WRITE-INS									
5801.		X X X							
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							

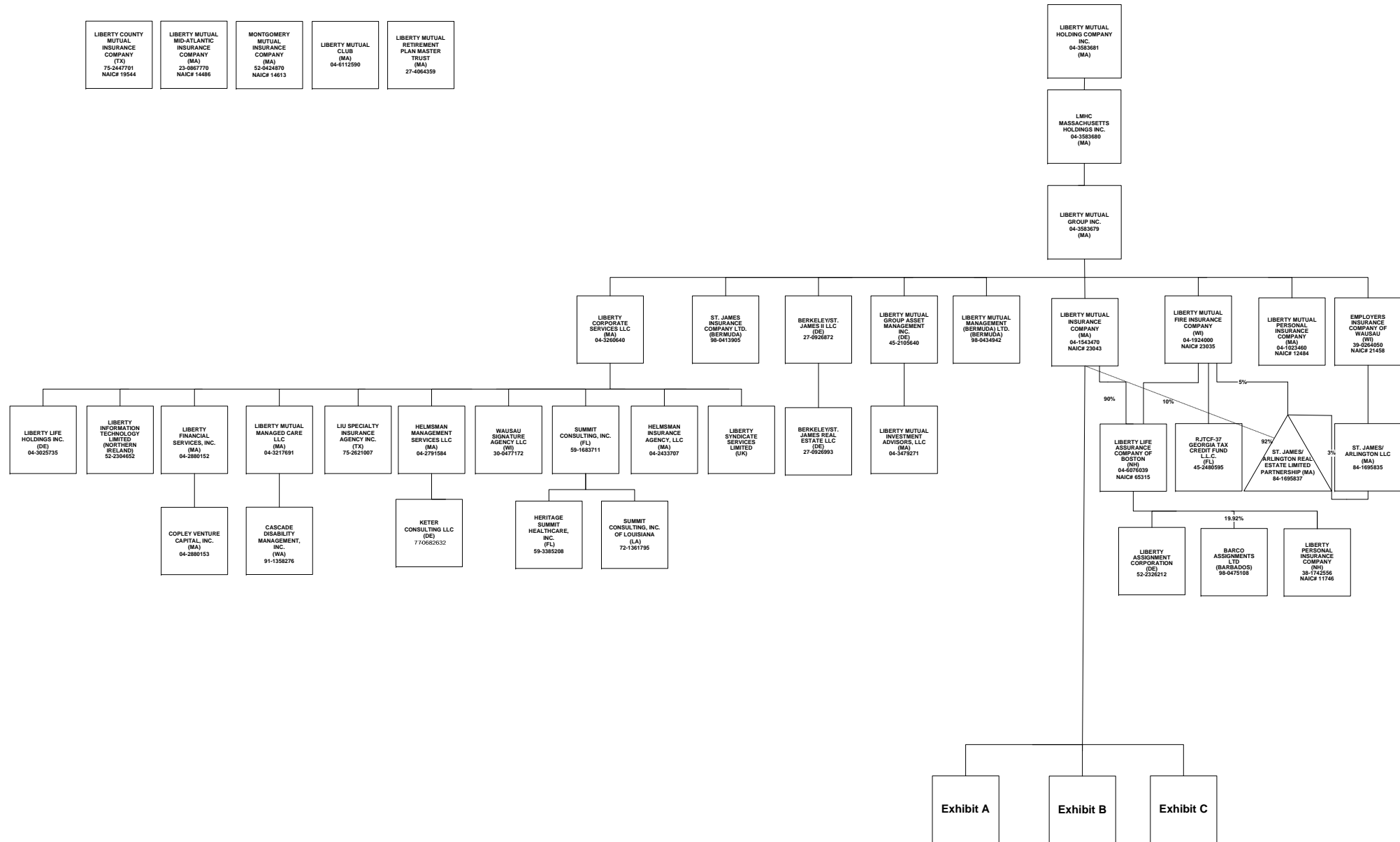
(L) Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) Registered - Non-domiciled RRGs; (Q) Qualified - Qualified or Accredited Reinsurer; (E) Eligible - Reporting Entities eligible or approved to write Surplus Lines In the state; (N) None of the above - Not allowed to write business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

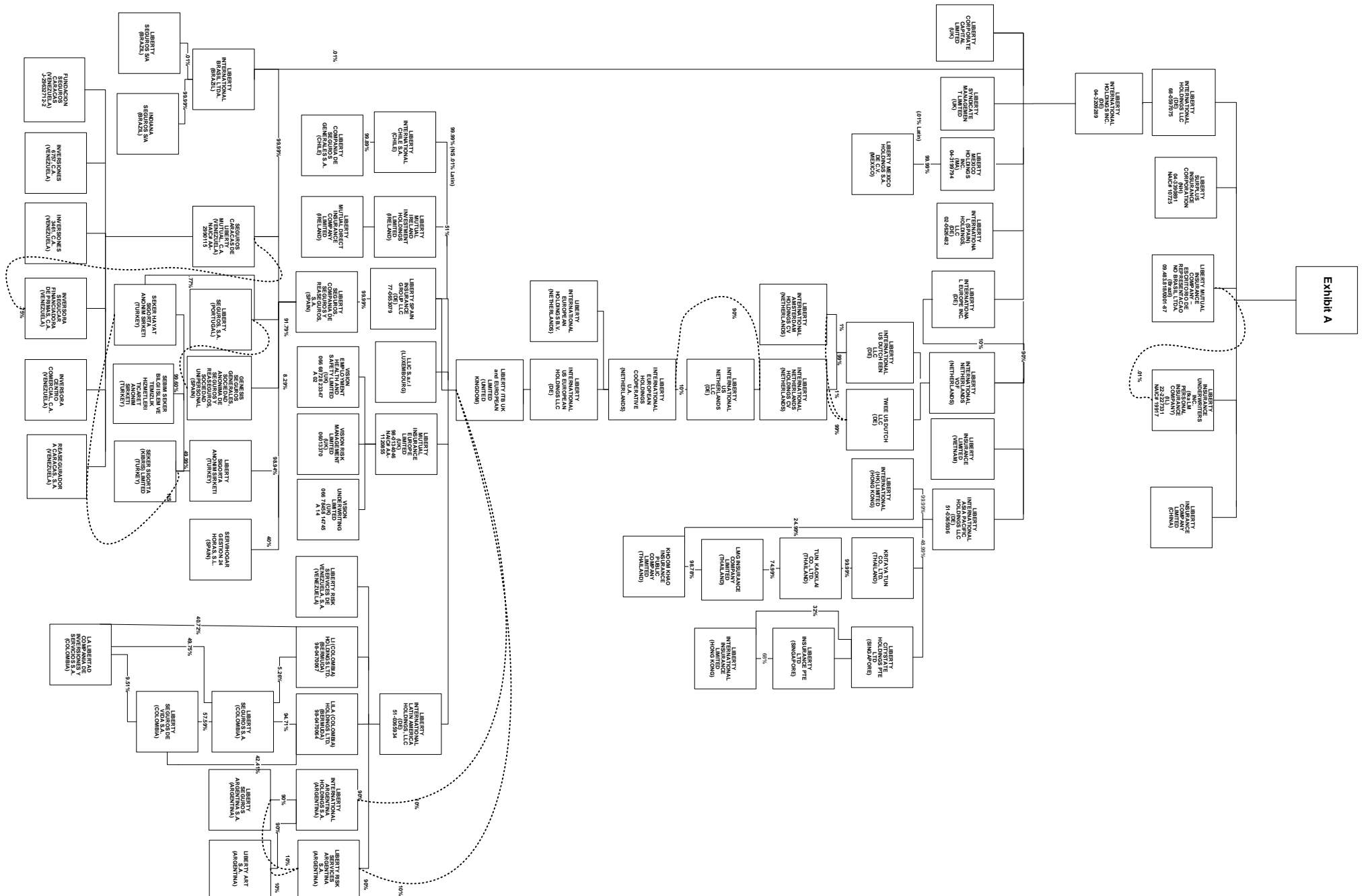
# SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

## PART 1 - ORGANIZATIONAL CHART



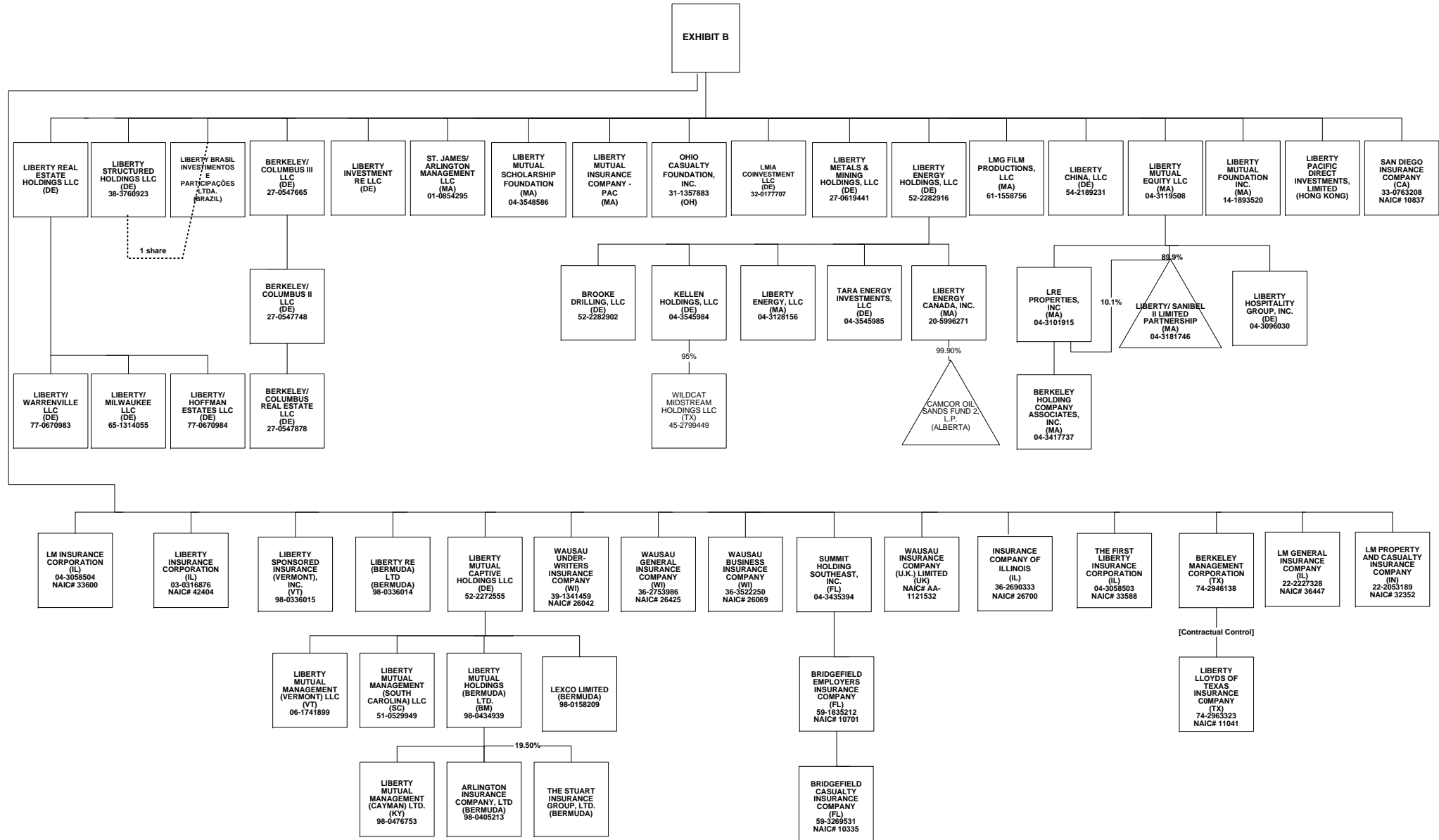
SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

PART 1 - ORGANIZATIONAL CHART



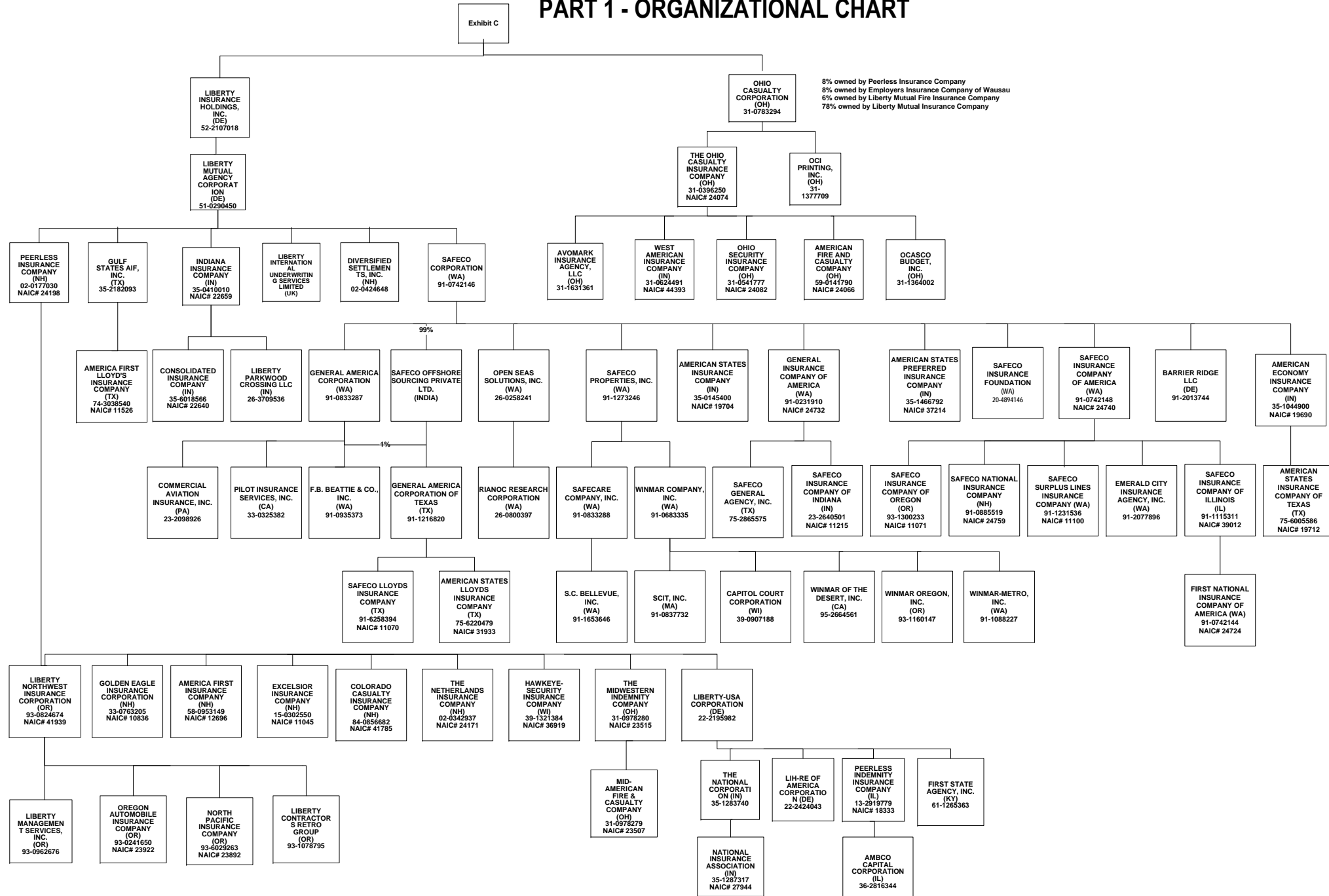
# SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

## PART 1 - ORGANIZATIONAL CHART



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**OVERFLOW PAGE FOR WRITE-INS**

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<b>REMAINING WRITE-INS AGGREGATED AT LINE 25 FOR LIABILITIES</b>	Current Year	Prior Year
2504. Accrued return retrospective premiums .....		681,754
2505. Private passenger auto escrow .....		59,932
2597. Totals (Lines 2504 through 2596) (Page 3, Line 2598)		741,686



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