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BEFORE THE COMMISSIONER OF INSURANCE  
OF THE STATE OF UTAH

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In Re:	:	
	:	
MULTISTATE REGULATORY	:	ADOPTION OF
SETTLEMENT AGREEMENT WITH:	:	REGULATORY
	:	SETTLEMENT AGREEMENT
	:	
SYMETRA LIFE INSURANCE COMPANY,	:	Docket No. 2014-123 AD
AND SYMETRA NATIONAL LIFE	:	
INSURANCE COMPANY	:	Enforcement Case No. 3553
	:	
	:	

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WHEREAS, a regulatory settlement agreement (“Regulatory Settlement Agreement” or “RSA”) has been entered into between (a) Symetra Life Insurance Company and Symetra National Life Insurance Company and each of their predecessors, successors, assigns and subsidiaries (collectively referred to herein as “Symetra,” the “Company,” or the “Companies”)

and (b) the insurance regulators of California, Florida, Illinois, North Dakota, New Hampshire, Pennsylvania, and Washington (“Lead States” or “Departments”), which RSA was signed by Symetra on November 19, 2014, and by each Lead State and at least 13 other states to sign no later than December 19, 2014;

WHEREAS, the Departments have regulatory jurisdiction over the business of insurance conducted in their respective jurisdictions, including the authority to conduct market conduct examinations;

WHEREAS, the Departments are the Lead and Participating States in the Multi-State Examination that were called to assess the Company's activities relating to certain practices and procedures with respect to funds held or owing under life insurance policies, annuity contracts and retained asset accounts, and to determine if Symetra’s practices reflected systemic unfair claim or deceptive acts and/or unfair settlement practices;

WHEREAS, based upon the information gathered to date, the Departments have identified concerns regarding the timely and adequate identification of potentially deceased insured, annuitant, annuity contract owners, and/or retained asset account holders; efforts to locate and pay beneficiaries when Symetra may have had knowledge that an insured, annuitant, annuity contract owner and/or retained asset account owner has died but no claim has been filed; and handling of other areas related to claims settlement practices and management of unclaimed property;

WHEREAS, the Company and the Departments desire to resolve the differences between the Parties as an alternative to a lengthy adjudicatory process and a negotiated settlement would provide immediate benefits to Symetra’s life insurance policyholders and annuitants;

WHEREAS, the Departments assert that the level of claims handling by Symetra was sufficient to merit further regulatory action, though no special formal finding were reached by the parties;

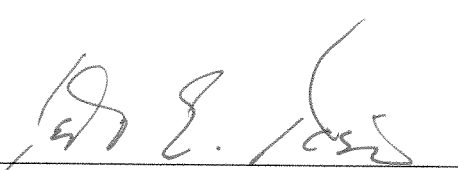
WHEREAS, the RSA will become effective upon the date the RSA has been executed by the Company, the Lead States, and the insurance regulators of at least 13 of the other "Participating States;" and

WHEREAS, the Commissioner of Insurance of the State of Utah has determined that it is in the best interests of the citizens of the State of Utah that the Utah Insurance Department participate in the settlement of the subject matter of the RSA;

NOW THEREFORE, IT IS HEREBY ORDERED:

The Commissioner of Insurance of the State of Utah, as executive director of the Utah Insurance Department, hereby adopts, agrees to, and approves the Regulatory Settlement Agreement by and between the Companies and the Participating States (including the Lead States) that was signed by Symetra on November 19, 2014, and by the Participating States no later than December 19, 2014.

DATED this 14 day of December, 2014.



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TODD E. KISER  
Commissioner of Insurance  
of the State of Utah  
Utah Insurance Department  
3110 State Office Building  
Salt Lake City, UT 84114  
Telephone: 801-538-3800

**SCHEDULE B  
PARTICIPATING REGULATOR ADOPTION**

**SYMETRA**

**EXAMINATION RESOLUTION AGREEMENT**

On behalf of Utah, I, Todd E. Kiser,  
(Jurisdiction) (Chief Insurance Regulator)  
hereby adopt, agree, and approve this Agreement.

BY: [Signature]  
(Signature)

JURISDICTION: Utah

TITLE: Commissioner

DATE: December 1 2014

Please provide the following information as to how your jurisdiction's allocation of the Multi-State Examination Payment should be sent from the SYMETRA Companies.

CONTACT NAME: PATRICK LEE

MAILING ADDRESS: 3110 State Office Bldg  
SLC, UT 84114

PAYMENT MADE TO: Utah Insurance  
Department

Please return this form to:


Raquel Cano, Assistant to the General Counsel  
Legal Division Office  
California Department of Insurance  
45 Fremont Street, 23rd Floor  
San Francisco, California 94105  
Phone: 415-538-4372  
Fax: 415-904-5889  
Email: Raquel.Cano@insurance.ca.gov

CERTIFICATE OF MAILING

The undersigned hereby certifies that on this date, a true and correct copy of the foregoing ADOPTION OF REGULATORY SETTLEMENT AGREEMENT was e-mailed, to [Raquel.Cano@insurance.ca.gov](mailto:Raquel.Cano@insurance.ca.gov) and mailed, postage prepaid, a true and correct copy of the following:

Raquel Cano, Assistant to the General Counsel  
Legal Division Office  
California Department of Insurance  
45 Fremont Street, 23rd Floor  
San Francisco, California 94105

DATED this 1<sup>st</sup> day December, 2014

  
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LINDA HARDY  
UTAH INSURANCE DEPARTMENT  
STATE OFFICE BUILDING, ROOM 3110  
SALT LAKE CITY, UT 84114-6901