

**QUARTERLY STATEMENT**

**OF THE**

**First Allmerica Financial Life Insurance Company**

**TO THE**

**Insurance Department**

**OF THE**

**STATE OF**

**FOR THE QUARTER ENDED  
MARCH 31, 2021**

LIFE, ACCIDENT AND HEALTH

FRATERNAL BENEFIT SOCIETIES

**2021**



LIFE, ACCIDENT AND HEALTH COMPANIES/FRATERNAL BENEFIT SOCIETIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF MARCH 31, 2021

OF THE CONDITION AND AFFAIRS OF THE

First Allmerica Financial Life Insurance Company

NAIC Group Code 3891 (Current) 3891 (Prior) NAIC Company Code 69140 Employer's ID Number 04-1867050

Organized under the Laws of Massachusetts, State of Domicile or Port of Entry MA

Country of Domicile United States of America

Licensed as business type: Life Accident and Health [X] Fraternal Benefit Societies [ ]

Incorporated/Organized 03/18/1844 Commenced Business 06/01/1845

Statutory Home Office 20 Guest Street (Street and Number) Brighton, MA, US 02135 (City or Town, State, Country and Zip Code)

Main Administrative Office 20 Guest Street (Street and Number) Brighton, MA, US 02135 (City or Town, State, Country and Zip Code) 508-460-2400 (Area Code) (Telephone Number)

Mail Address 20 Guest Street (Street and Number or P.O. Box) Brighton, MA, US 02135 (City or Town, State, Country and Zip Code)

Primary Location of Books and Records 20 Guest Street (Street and Number) Brighton, MA, US 02135 (City or Town, State, Country and Zip Code) 508-460-2400 (Area Code) (Telephone Number)

Internet Website Address www.globalatlantic.com

Statutory Statement Contact Andrew Chilson Morse (Name) 508-460-2468 (Area Code) (Telephone Number) andrew.morse@gafj.com (E-mail Address) 774-369-3825 (FAX Number)

OFFICERS

President Robert Michael Arena Jr. Chief Financial Officer David Allen Jacoby
SVP, Associate General Counsel, Sec. Kathryn Lauren Freund SVP and Appointed Actuary Robert James Egan

OTHER

Anup Agarwal, Chief Investment Officer; Padma Elmgart, Chief Technology Officer; Jason Alexander Bickler, MD, Chief Distribution Officer; Mark Francis Erickson, MD & COO - Investments; Thomas Andrew Doruska, SVP, Illustration Actuary; Susan Lorraine Fiangco, Managing Director; Brian Michael Hendry, Chief Audit Executive; Jonathan Hecht, Managing Director; Virginia Hope Johnson, SVP, Asst. GC, Asst. Sec.; Jason Kao, Managing Director; Kevin Michael Kimmerling, SVP, Assoc. GC, Asst. Sec.; Lori Ann LaForge, Chief Marketing Officer; Victoria May Lau, Senior Vice President; Kevin Francis Leavey, SVP, Product Actuary; Emily Anne LeMay, Managing Director; Hanben Kim Lee, Executive Vice President; Juan Ignacio Mazzini, Senior Vice President; Justin David MacNeil, MD, Asst. Treasurer; Stephen John McInyre, Managing Director; Daniel Patrick O'Shea, Chief Administrative Officer; Sarah Marie Patterson, Managing Director; Samuel Ramos, Chief Legal Officer and GC; Jason Michael Roach, Managing Director; Kelly June Rutherford, Senior Vice President; Maru Sareen, Managing Director; Lauren Taylor Scott, Senior Vice President; Andrew Mead Shalberg, Chief Compliance Officer; Philip William Sherrill, Managing Director; Gary Phillip Silber, Managing Director; Sarah Anne Williams, Managing Director; Zhilong Zhou, Senior Vice President; Edward Clive Wilson, Chief Risk Officer

DIRECTORS OR TRUSTEES

Robert Michael Arena Jr., Eric David Todd, David Allen Jacoby, David Paul Wilken, Hanben Kim Lee

State of Iowa County of Polk 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.

DocuSigned by: Robert Michael Arena, Jr. President

DocuSigned by: Kathryn Lauren Freund SVP, Associate General Counsel, Secretary

DocuSigned by: David Allen Jacoby Chief Financial Officer

Subscribed and sworn to before me this 28th day of April, 2021 Jennifer Coggins

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



STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**ASSETS**

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds .....	2,048,554,766		2,048,554,766	2,067,627,812
2. Stocks:				
2.1 Preferred stocks .....				
2.2 Common stocks .....				
3. Mortgage loans on real estate:				
3.1 First liens .....	5,827,409		5,827,409	5,897,583
3.2 Other than first liens .....				
4. Real estate:				
4.1 Properties occupied by the company (less \$ encumbrances) .....				
4.2 Properties held for the production of income (less \$ ..... encumbrances) .....				
4.3 Properties held for sale (less \$ encumbrances) .....				
5. Cash (\$ .....11,618,051 ), cash equivalents (\$ .....56,287,374 ) and short-term investments (\$ ..... ) .....	67,905,425		67,905,425	71,872,105
6. Contract loans (including \$ ..... premium notes) .....	46,879,167	3,127,262	43,751,905	44,509,106
7. Derivatives .....	5,820		5,820	1,528,656
8. Other invested assets .....	10,733,816		10,733,816	12,420,943
9. Receivables for securities .....	222		222	1,712,884
10. Securities lending reinvested collateral assets .....				
11. Aggregate write-ins for invested assets .....				
12. Subtotals, cash and invested assets (Lines 1 to 11) .....	2,179,906,625	3,127,262	2,176,779,363	2,205,569,089
13. Title plants less \$ ..... charged off (for Title insurers only) .....				
14. Investment income due and accrued .....	31,538,419		31,538,419	30,227,470
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection .....	417,467	194,915	222,552	244,516
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ ..... earned but unbilled premiums) .....	1,979,242		1,979,242	2,108,227
15.3 Accrued retrospective premiums (\$ ..... ) and contracts subject to redetermination (\$ ..... ) .....				
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers .....	28,583,714		28,583,714	34,950,437
16.2 Funds held by or deposited with reinsured companies .....	584,898,256		584,898,256	588,720,713
16.3 Other amounts receivable under reinsurance contracts .....	40,410,531	144,284	40,266,247	28,130,200
17. Amounts receivable relating to uninsured plans .....				
18.1 Current federal and foreign income tax recoverable and interest thereon .....	31,559,090		31,559,090	31,278,517
18.2 Net deferred tax asset .....	1,309,645		1,309,645	
19. Guaranty funds receivable or on deposit .....	119,316		119,316	119,316
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 .....	103,239	103,239		
25. Aggregate write-ins for other than invested assets .....	1,840,005	221	1,839,784	2,786,623
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25) .....	2,902,665,549	3,569,921	2,899,095,628	2,924,135,108
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts .....	138,734,836		138,734,836	138,148,491
28. Total (Lines 26 and 27) .....	3,041,400,385	3,569,921	3,037,830,464	3,062,283,599
<b>DETAILS OF WRITE-INS</b>				
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. Service fee receivable .....	315,887	221	315,666	1,254,752
2502. Pension annuity contract .....	1,508,878		1,508,878	1,531,871
2503. Third Party Funding .....	15,240		15,240	
2598. Summary of remaining write-ins for Line 25 from overflow page .....				
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above) .....	1,840,005	221	1,839,784	2,786,623

**LIABILITIES, SURPLUS AND OTHER FUNDS**

	1 Current Statement Date	2 December 31 Prior Year
1. Aggregate reserve for life contracts \$ 448,838,672 less \$ included in Line 6.3 (including \$ Modco Reserve)	448,838,672	453,957,641
2. Aggregate reserve for accident and health contracts (including \$ Modco Reserve)		
3. Liability for deposit-type contracts (including \$ Modco Reserve)	291,560,867	295,198,947
4. Contract claims:		
4.1 Life	16,599,557	12,063,762
4.2 Accident and health		
5. Policyholders' dividends/refunds to members \$ and coupons \$ due and unpaid	269,347	267,820
6. Provision for policyholders' dividends, refunds to members and coupons payable in following calendar year - estimated amounts:		
6.1 Policyholders' dividends and refunds to members apportioned for payment (including \$ Modco)	62,275	136,295
6.2 Policyholders' dividends and refunds to members not yet apportioned (including \$ Modco)		
6.3 Coupons and similar benefits (including \$ Modco)		
7. Amount provisionally held for deferred dividend policies not included in Line 6		
8. Premiums and annuity considerations for life and accident and health contracts received in advance less \$ discount; including \$ accident and health premiums	56,187	38,502
9. Contract liabilities not included elsewhere:		
9.1 Surrender values on canceled contracts		
9.2 Provision for experience rating refunds, including the liability of \$ accident and health experience rating refunds of which \$ is for medical loss ratio rebate per the Public Health Service Act		
9.3 Other amounts payable on reinsurance, including \$ 4,277,667 assumed and \$ 35,114,529 ceded	39,392,196	46,348,358
9.4 Interest Maintenance Reserve	27,314,548	27,558,769
10. Commissions to agents due or accrued-life and annuity contracts \$ , accident and health \$ and deposit-type contract funds \$	33,107	11,728
11. Commissions and expense allowances payable on reinsurance assumed		
12. General expenses due or accrued	2,899,401	1,751,094
13. Transfers to Separate Accounts due or accrued (net) (including \$ accrued for expense allowances recognized in reserves, net of reinsured allowances)	(3,205,468)	(3,450,308)
14. Taxes, licenses and fees due or accrued, excluding federal income taxes	628,386	928,315
15.1 Current federal and foreign income taxes, including \$ on realized capital gains (losses)		
15.2 Net deferred tax liability		769,142
16. Unearned investment income	45	217
17. Amounts withheld or retained by reporting entity as agent or trustee	78,946	83,912
18. Amounts held for agents' account, including \$ agents' credit balances		
19. Remittances and items not allocated	14,813,689	17,657,575
20. Net adjustment in assets and liabilities due to foreign exchange rates		
21. Liability for benefits for employees and agents if not included above	3,070,313	3,048,014
22. Borrowed money \$ and interest thereon \$		
23. Dividends to stockholders declared and unpaid		
24. Miscellaneous liabilities:		
24.01 Asset valuation reserve	14,326,355	12,300,365
24.02 Reinsurance in unauthorized and certified (\$ ) companies		
24.03 Funds held under reinsurance treaties with unauthorized and certified (\$ ) reinsurers	697,710,017	701,175,163
24.04 Payable to parent, subsidiaries and affiliates	1,449,266	1,493,059
24.05 Drafts outstanding		
24.06 Liability for amounts held under uninsured plans		
24.07 Funds held under coinsurance	1,224,394,064	1,222,836,683
24.08 Derivatives		227,995
24.09 Payable for securities		859,133
24.10 Payable for securities lending		
24.11 Capital notes \$ and interest thereon \$		
25. Aggregate write-ins for liabilities	13,581,363	13,314,677
26. Total liabilities excluding Separate Accounts business (Lines 1 to 25)	2,793,873,133	2,808,576,857
27. From Separate Accounts Statement	138,734,836	138,148,491
28. Total liabilities (Lines 26 and 27)	2,932,607,969	2,946,725,348
29. Common capital stock	5,000,010	5,000,010
30. Preferred capital stock		
31. Aggregate write-ins for other than special surplus funds		
32. Surplus notes		
33. Gross paid in and contributed surplus	452,977,661	452,977,661
34. Aggregate write-ins for special surplus funds	2,250,000	2,250,000
35. Unassigned funds (surplus)	(355,005,176)	(344,669,420)
36. Less treasury stock, at cost:		
36.1 shares common (value included in Line 29 \$ )		
36.2 shares preferred (value included in Line 30 \$ )		
37. Surplus (Total Lines 31+32+33+34+35-36) (including \$ in Separate Accounts Statement)	100,222,485	110,558,241
38. Totals of Lines 29, 30 and 37	105,222,495	115,558,251
39. Totals of Lines 28 and 38 (Page 2, Line 28, Col. 3)	3,037,830,464	3,062,283,599
<b>DETAILS OF WRITE-INS</b>		
2501. Funds withheld other liabilities	10,351,439	10,397,278
2502. Other liabilities	2,229,924	1,917,399
2503. Misc Liab -Litigation Reserves	1,000,000	1,000,000
2598. Summary of remaining write-ins for Line 25 from overflow page		
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	13,581,363	13,314,677
3101.		
3102.		
3103.		
3198. Summary of remaining write-ins for Line 31 from overflow page		
3199. Totals (Lines 3101 through 3103 plus 3198)(Line 31 above)		
3401. Contingency reserves	2,250,000	2,250,000
3402.		
3403.		
3498. Summary of remaining write-ins for Line 34 from overflow page		
3499. Totals (Lines 3401 through 3403 plus 3498)(Line 34 above)	2,250,000	2,250,000

## SUMMARY OF OPERATIONS

	1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
1. Premiums and annuity considerations for life and accident and health contracts	(291,709)	1,461,489	(921,930,887)
2. Considerations for supplementary contracts with life contingencies	26,000	56,126	283,633
3. Net investment income	20,909,863	27,055,581	105,731,251
4. Amortization of Interest Maintenance Reserve (IMR)	761,083	1,214,171	5,278,803
5. Separate Accounts net gain from operations excluding unrealized gains or losses			
6. Commissions and expense allowances on reinsurance ceded	4,131,056	2,132,461	(22,666,195)
7. Reserve adjustments on reinsurance ceded			
8. Miscellaneous Income:			
8.1 Income from fees associated with investment management, administration and contract guarantees from Separate Accounts	4,601,155	2,627,399	17,831,969
8.2 Charges and fees for deposit-type contracts			
8.3 Aggregate write-ins for miscellaneous income	(1,453,610)	11,950,070	33,382,251
9. Totals (Lines 1 to 8.3)	28,683,838	46,497,297	(782,089,176)
10. Death benefits	6,757,680	13,849,853	44,025,575
11. Matured endowments (excluding guaranteed annual pure endowments)	218	386	749
12. Annuity benefits	5,784,280	6,157,416	28,228,934
13. Disability benefits and benefits under accident and health contracts	10,426	119,048	262,359
14. Coupons, guaranteed annual pure endowments and similar benefits			
15. Surrender benefits and withdrawals for life contracts	2,611,807	11,162,376	28,211,439
16. Group conversions			
17. Interest and adjustments on contract or deposit-type contract funds	(159,478)	(40,989)	(654,934)
18. Payments on supplementary contracts with life contingencies			
19. Increase in aggregate reserves for life and accident and health contracts	(5,118,969)	(4,586,165)	(917,996,799)
20. Totals (Lines 10 to 19)	9,885,964	26,661,925	(817,922,677)
21. Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only)	353,515	418,749	1,554,160
22. Commissions and expense allowances on reinsurance assumed	1,000,654	1,261,622	4,961,401
23. General insurance expenses and fraternal expenses	2,829,939	2,698,344	11,511,446
24. Insurance taxes, licenses and fees, excluding federal income taxes	1,035,467	807,589	3,051,040
25. Increase in loading on deferred and uncollected premiums	10,718	(81,191)	5,619,897
26. Net transfers to or (from) Separate Accounts net of reinsurance	(928,748)	(52,998)	(607,732)
27. Aggregate write-ins for deductions	23,317,546	17,329,442	56,484,604
28. Totals (Lines 20 to 27)	37,505,055	49,043,482	(735,347,861)
29. Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)	(8,821,217)	(2,546,185)	(46,741,315)
30. Dividends to policyholders and refunds to members	2,415	68,213	(46,749)
31. Net gain from operations after dividends to policyholders, refunds to members and before federal income taxes (Line 29 minus Line 30)	(8,823,632)	(2,614,398)	(46,694,566)
32. Federal and foreign income taxes incurred (excluding tax on capital gains)	6,697	(5,423,911)	(35,625,283)
33. Net gain from operations after dividends to policyholders, refunds to members and federal income taxes and before realized capital gains or (losses) (Line 31 minus Line 32)	(8,830,329)	2,809,513	(11,069,283)
34. Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of \$ (408,323) (excluding taxes of \$ 121,053 transferred to the IMR)	559,558	2,608,358	506,133
35. Net income (Line 33 plus Line 34)	(8,270,771)	5,417,871	(10,563,150)
<b>CAPITAL AND SURPLUS ACCOUNT</b>			
36. Capital and surplus, December 31, prior year	115,558,251	245,634,758	245,634,758
37. Net income (Line 35)	(8,270,771)	5,417,871	(10,563,150)
38. Change in net unrealized capital gains (losses) less capital gains tax of \$ (149,782)	(563,465)	(9,874,610)	(6,788,128)
39. Change in net unrealized foreign exchange capital gain (loss)			
40. Change in net deferred income tax	1,929,005	(3,723,870)	(12,128,329)
41. Change in nonadmitted assets	83,685	(227,466)	2,432,738
42. Change in liability for reinsurance in unauthorized and certified companies			
43. Change in reserve on account of change in valuation basis, (increase) or decrease			
44. Change in asset valuation reserve	(2,025,991)	(316,418)	(999,812)
45. Change in treasury stock			
46. Surplus (contributed to) withdrawn from Separate Accounts during period			
47. Other changes in surplus in Separate Accounts Statement			
48. Change in surplus notes			
49. Cumulative effect of changes in accounting principles			
50. Capital changes:			
50.1 Paid in			
50.2 Transferred from surplus (Stock Dividend)			
50.3 Transferred to surplus			
51. Surplus adjustment:			
51.1 Paid in			(100,000,000)
51.2 Transferred to capital (Stock Dividend)			
51.3 Transferred from capital			
51.4 Change in surplus as a result of reinsurance	(1,488,219)	(619,060)	(2,029,827)
52. Dividends to stockholders			
53. Aggregate write-ins for gains and losses in surplus			
54. Net change in capital and surplus for the year (Lines 37 through 53)	(10,335,756)	(9,343,553)	(130,076,507)
55. Capital and surplus, as of statement date (Lines 36 + 54)	105,222,495	236,291,205	115,558,251
<b>DETAILS OF WRITE-INS</b>			
08.301. Mortality fee income	8,088,004	9,233,158	33,269,052
08.302. Funds withheld assumed net investment income	(9,599,051)	2,030,568	207,919
08.303. FWH assumed realized loss	28,683		(139,942)
08.398. Summary of remaining write-ins for Line 8.3 from overflow page	28,754	686,344	45,222
08.399. Totals (Lines 08.301 through 08.303 plus 08.398) (Line 8.3 above)	(1,453,610)	11,950,070	33,382,251
2701. Net change in deposit liabilities	16,085,786	8,559,522	58,504,878
2702. Funds withheld ceded net investment income	6,483,486	8,507,055	34,578,602
2703. FWH ceded realized gain		(437,423)	
2798. Summary of remaining write-ins for Line 27 from overflow page	748,274	700,288	(36,598,876)
2799. Totals (Lines 2701 through 2703 plus 2798)(Line 27 above)	23,317,546	17,329,442	56,484,604
5301. Prior year adjustment			
5302.			
5303.			
5398. Summary of remaining write-ins for Line 53 from overflow page			
5399. Totals (Lines 5301 through 5303 plus 5398)(Line 53 above)			

**CASH FLOW**

	1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
<b>Cash from Operations</b>			
1. Premiums collected net of reinsurance .....	2,943,503	1,007,359	17,030,447
2. Net investment income .....	18,812,027	22,464,836	95,273,741
3. Miscellaneous income .....	(3,047,349)	26,394,449	1,991,200
4. Total (Lines 1 to 3) .....	18,708,181	49,866,644	114,295,388
5. Benefit and loss related payments .....	11,058,577	56,342,276	106,139,450
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts .....	(1,173,588)	14,872	(925,124)
7. Commissions, expenses paid and aggregate write-ins for deductions .....	28,020,886	16,983,687	115,436,514
8. Dividends paid to policyholders .....	74,908	207,589	190,732
9. Federal and foreign income taxes paid (recovered) net of \$ ..... 0 tax on capital gains (losses) .....			3,329,336
10. Total (Lines 5 through 9) .....	37,980,783	73,548,424	224,170,908
11. Net cash from operations (Line 4 minus Line 10) .....	(19,272,602)	(23,681,780)	(109,875,520)
<b>Cash from Investments</b>			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds .....	48,543,222	38,498,411	323,051,559
12.2 Stocks .....			
12.3 Mortgage loans .....	61,823	81,105	3,780,734
12.4 Real estate .....			
12.5 Other invested assets .....	909,867	11,564,149	905,100
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments .....	1,199	(3,896)	(11,488)
12.7 Miscellaneous proceeds .....	2,495,812	(10,896)	28,234,129
12.8 Total investment proceeds (Lines 12.1 to 12.7) .....	52,011,923	50,128,873	355,960,034
13. Cost of investments acquired (long-term only):			
13.1 Bonds .....	28,140,727	60,532,796	140,856,573
13.2 Stocks .....			
13.3 Mortgage loans .....			
13.4 Real estate .....			
13.5 Other invested assets .....		6,550,187	508,609
13.6 Miscellaneous applications .....			691,140
13.7 Total investments acquired (Lines 13.1 to 13.6) .....	28,140,727	67,082,983	142,056,322
14. Net increase (or decrease) in contract loans and premium notes .....	(829,965)	(1,127,933)	(2,477,118)
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14) .....	24,701,161	(15,826,177)	216,380,830
<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 .....			(100,000,000)
16.3 Borrowed funds .....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities .....	(3,638,080)	(2,652,298)	(4,079,237)
16.5 Dividends to stockholders .....			
16.6 Other cash provided (applied) .....	(5,757,158)	(33,145,171)	(51,926,847)
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6) .....	(9,395,238)	(35,797,469)	(156,006,084)
<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) .....	(3,966,679)	(75,305,426)	(49,500,774)
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year .....	71,872,104	121,372,878	121,372,878
19.2 End of period (Line 18 plus Line 19.1) .....	67,905,425	46,067,452	71,872,104

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

20.0001. Non-cash tax free exchange on bonds .....			10,258,628
20.0002. Tax free exchange on bonds .....			3,495,390
20.0003. Non-cash premiums ceded on a funds withheld basis .....			927,937,273
20.0004. Non-cash transfer of assets .....			
20.0005. Non-cash increase contract loans .....			
20.0006. Remittance of bonds and accrued interest for capital contribution .....			

**EXHIBIT 1**

**DIRECT PREMIUMS AND DEPOSIT-TYPE CONTRACTS**

	1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
1. Industrial life .....			
2. Ordinary life insurance .....	15,234,609	16,649,614	50,029,101
3. Ordinary individual annuities .....	78,046	37,873	249,132
4. Credit life (group and individual) .....			
5. Group life insurance .....	858,040	883,678	3,164,831
6. Group annuities .....	93,888	257,622	1,615,943
7. A & H - group .....			
8. A & H - credit (group and individual) .....			
9. A & H - other .....	13,973	25,488	67,981
10. Aggregate of all other lines of business .....			
11. Subtotal (Lines 1 through 10) .....	16,278,556	17,854,275	55,126,987
12. Fraternal (Fraternal Benefit Societies Only) .....			
13. Subtotal (Lines 11 through 12) .....	16,278,556	17,854,275	55,126,987
14. Deposit-type contracts .....		573,616	
15. Total (Lines 13 and 14)	16,278,556	18,427,891	55,126,987
DETAILS OF WRITE-INS			
1001. ....			
1002. ....			
1003. ....			
1098. Summary of remaining write-ins for Line 10 from overflow page .....			
1099. Totals (Lines 1001 through 1003 plus 1098)(Line 10 above)			

## Notes to the Financial Statements

### 1. Summary of Significant Accounting Policies and Going Concern

#### A. Accounting Practices

First Allmerica Financial Life Insurance Company (FAFLIC or the Company) is a stock life insurance company organized under the laws of the Commonwealth of Massachusetts, and is a wholly-owned subsidiary of the Commonwealth Annuity and Life Insurance Company (Commonwealth Annuity). FAFLIC insures and reinsures blocks of traditional life, retirement products, and fixed annuities. The Company has issued such products as variable annuities, variable life products, and certain accident & health products, which have been reinsured with and are administered by reinsurers.

The financial statements of FAFLIC are completed in accordance with those statutory accounting practices prescribed or permitted by the Commonwealth of Massachusetts. The National Association of Insurance Commissioners' (NAIC) Accounting Practices and Procedures manual (NAIC SAP) has been fully adopted as a component of prescribed or permitted practices by the Commonwealth of Massachusetts. The Commonwealth of Massachusetts has not issued any permitted practices to the Company.

	SSAP #	F/S Page	F/S Line #	03/31/2021	12/31/2020
Net Income					
(1) State basis (Page 4, Line 35, Columns 1 & 3)	XXX	XXX	XXX	\$ (8,270,771)	\$ (10,563,150)
(2) State prescribed practices that are an increase / (decrease) from NAIC SAP:					
(3) State permitted practices that are an increase / (decrease) from NAIC SAP:					
(4) NAIC SAP (1-2-3=4)	XXX	XXX	XXX	<u>\$ (8,270,771)</u>	<u>\$ (10,563,150)</u>
Surplus					
(5) State basis (Page 3, Line 38, Columns 1 & 2)	XXX	XXX	XXX	\$ 105,222,495	\$ 115,558,251
(6) State prescribed practices that are an increase / (decrease) from NAIC SAP:					
(7) State permitted practices that are an increase / (decrease) from NAIC SAP:					
(8) NAIC SAP (5-6-7=8)	XXX	XXX	XXX	<u>\$ 105,222,495</u>	<u>\$ 115,558,251</u>

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

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

#### C. Accounting Policy

Life premiums are recognized as income over the premium paying period of the related policies. Annuity considerations are recognized as income when received. Deposits on deposit-type contracts are entered directly as a liability when received. Treaties that do not meet the definition of risk transfer are recorded under the rules of deposit accounting as prescribed in Statement of Statutory Accounting Principles (SSAP) No. 61R – *Life, Deposit-Type and Accident and Health Reinsurance*. Expenses incurred in connection with acquiring new insurance business, including acquisition costs such as sales commissions, are charged to operations as incurred. The amount of dividends to be paid to policyholders is determined annually by the Company's Board of Directors. The aggregate amount of policyholder dividends is set such that anticipated revenue from the Closed Block is expected to be sufficient to support future payments for claims, certain expenses and taxes and to provide for the continuation of the dividend scales set in that year. In addition, the Company uses the following accounting policies:

- (1) Short-term investments that have original maturities of greater than three months and less than twelve months at date of purchase are carried at amortized cost, which approximates fair value.
- (2) Bonds not backed by other loans are stated at amortized cost or fair value, using the modified scientific method, in accordance with the NAIC Purposes and Procedures Manual of the Capital Markets and Investment Analysis Office. The Company does not hold SVO - designated securities which would be valued using a systematic value measurement method.
- (3) Common stocks are carried at fair value, except investments in stocks of uncombined subsidiaries and affiliates in which the Company has an interest of 10% or more are carried on the equity basis. The Company does not have any common stock.
- (4) The Company does not have any preferred stocks.
- (5) Mortgage loans are stated at amortized cost or fair value, in accordance with the NAIC Purposes and Procedures Manual of the Capital Markets and Investment Analysis Office.
- (6) Loan-backed bonds and structured securities are stated at amortized cost using the interest method including anticipated prepayments at the date of purchase in accordance with SSAP No. 43R - *Loan-Backed and Structured Securities*. Changes in prepayment speeds and estimated cash flows from the original purchase assumptions are evaluated quarterly and are accounted for on the prospective basis.
- (7) The Company does not have any investments in subsidiary, controlled and affiliated companies.
- (8) The Company has ownership interests in limited partnerships, joint ventures, or limited liability entities. The Company carries these interests based upon their proportionate share of the underlying GAAP equity of the investment.
- (9) Derivative instruments are accounted for at fair value. The changes in the fair market value of the derivative instruments are recorded as unrealized gains or unrealized losses until termination.
- (10) The Company does not anticipate investment income as a factor in the premium deficiency calculation.
- (11) Claim reserves are established equal to 100% of the estimated benefit payable.
- (12) The Company did not have a change in the capitalization policy or resultant predefined thresholds from the prior year.
- (13) The Company does not have any pharmaceutical rebate receivables.

#### D. Going Concern

There is no substantial doubt about the Company's ability to continue as a going concern.

## Notes to the Financial Statements

**2. Accounting Changes and Corrections of Errors** - Not Applicable

**3. Business Combinations and Goodwill**

- A. Statutory Purchase Method - Not Applicable
- B. Statutory Merger - Not Applicable
- C. Assumption Reinsurance - Not Applicable
- D. Impairment Loss - Not Applicable

**4. Discontinued Operations**

The Company does not have any discontinued operations.

**5. Investments**

A. Mortgage Loans, including Mezzanine Real Estate Loans

- (1) Maximum and minimum lending rates for mortgage loans - Not Applicable
- (2) The maximum percentage of any one admitted loan to the value of the security at the time of the loan, exclusive of insured or guaranteed or purchase money mortgages during 2021 was 75.0%.
- (3) Taxes, assessments and any amounts advanced and not included in mortgage loan total - None

**Notes to the Financial Statements**

**5. Investments (Continued)**

(4) Age analysis of mortgage loans and identification of mortgage loans in which the insurer is a participant or co-lender in a mortgage loan agreement

	Farm	Residential		Commerical		Mezzanine	Total
		Insured	All Other	Insured	All Other		
a. Current Year							
1. Recorded Investment (All)							
(a) Current	\$	\$	\$	\$	5,827,409	\$	5,827,409
(b) 30 - 59 days past due							
(c) 60 - 89 days past due							
(d) 90 - 179 days past due							
(e) 180+ days past due							
2. Accruing Interest 90-179 Days Past Due							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest accrued							
3. Accruing Interest 180+ Days Past Due							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest accrued							
4. Interest Reduced							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
(b) Number of loans							
(c) Percent reduced	%	%	%	%	%	%	%
5. Participant or Co-lender in a Mortgage Loan Agreement							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
b. Prior Year							
1. Recorded Investment							
(a) Current	\$	\$	\$	\$	5,897,583	\$	5,897,583
(b) 30 - 59 days past due							
(c) 60 - 89 days past due							
(d) 90 - 179 days past due							
(e) 180+ days past due							
2. Accruing Interest 90-179 Days Past Due							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest accrued							
3. Accruing Interest 180+ Days Past Due							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest accrued							
4. Interest Reduced							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$
(b) Number of loans							
(c) Percent reduced	%	%	%	%	%	%	%
5. Participant or Co-lender in a Mortgage Loan Agreement							
(a) Recorded investment	\$	\$	\$	\$	\$	\$	\$

(5) Investment in impaired loans with or without allowance for credit losses and impaired loans subject to a participant or co-lender mortgage loan agreement for which the reporting entity is restricted from unilaterally foreclosing on the mortgage loan - Not Applicable

(6) Investment in impaired loans - average recorded investment, interest income recognized, recorded investment on nonaccrual status and amount of interest income recognized using a cash-basis method of accounting - None

(7) Allowance for credit losses - Not Applicable

(8) Mortgage loans derecognized as a result of foreclosure - Not Applicable

(9) Policy for recognizing interest income and impaired loans - Not Applicable

B. Debt Restructuring - Not Applicable

C. Reverse Mortgages - Not Applicable

**Notes to the Financial Statements**

**5. Investments (Continued)**

D. Loan-Backed Securities

- (1) Loan-backed and structured securities (LBASS) are valued and reported in accordance with SSAP No. 43R – *Loan-Backed and Structured Securities*. Prepayment assumptions are primarily obtained from external sources or internal estimates. These assumptions are consistent with the current interest rate and economic environment. The prospective adjustment method is used on most non-agency LBASS. Fair values are based on independent pricing sources. The Company reviews securities at least quarterly for other-than-temporary impairments (OTTI) using current cash flow assumptions. The Company has recognized an OTTI charge on loan-backed securities of \$42,064 and \$0 for the periods ended March 31, 2021 and December 31, 2020, respectively.
- (2) Loan-backed and structured securities with a recognized other-than-temporary impairment (OTTI) - Not Applicable
- (3) Securities held that were other-than-temporarily impaired due to the present value of cash flows expected to be collected was less than the amortized cost of securities

(1)	(2)	(3)	(4)	(5)	(6)	(7)
CUSIP	Book/Adjusted Carrying Value Amortized Cost Before Current Period OTTI	Present Value of Projected Cash Flows	Recognized OTTI	Amortized Cost After OTTI	Fair Value at Time of OTTI	Date of Financial Statement Where Reported
..45661KAA8..	\$..... 1,695,192	\$..... 1,653,128	\$..... 42,064	\$..... 1,653,128	\$..... 1,653,128	.....03/31/2021.....
<b>Total</b>			<b>\$..... 42,064</b>			

- (4) All impaired securities for which an OTTI has not been recognized in earnings as a realized loss

- a. The aggregate amount of unrealized losses:
  - 1. Less than 12 months..... \$..... (194,962)
  - 2. 12 months or longer..... (33,151)
- b. The aggregate related fair value of securities with unrealized losses:
  - 1. Less than 12 months..... \$..... 12,692,220
  - 2. 12 months or longer..... 540,277

- (5) The Company evaluates whether credit impairment exists by considering primarily the following factors: a) changes in the financial condition, credit rating and near term prospects of the issuer, b) whether the issuer is current on contractually obligated interest and principal payments, c) changes in the financial condition of the security's underlying collateral, d) the payment structure of the security and e) the length of time and extent to which the fair value has been less than amortized cost of the security.

E. Dollar Repurchase Agreements and/or Securities Lending Transactions - Not Applicable

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing - Not Applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing - Not Applicable

H. Repurchase Agreements Transactions Accounted for as a Sale - Not Applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale - Not Applicable

J. Real Estate - Not Applicable

K. Low-Income Housing Tax Credits (LIHTC) - Not Applicable

L. Restricted Assets

- (1) Restricted assets (including pledged) - No Significant Changes
- (2) Detail of assets pledged as collateral not captured in other categories (contracts that share similar characteristics, such as reinsurance and derivatives, are reported in the aggregate) - Not Applicable
- (3) Detail of other restricted assets (contracts that share similar characteristics, such as reinsurance and derivatives, are reported in the aggregate) - None
- (4) Collateral received and reflected as assets within the reporting entity's financial statements - None

M. Working Capital Finance Investments - Not Applicable

N. Offsetting and Netting of Assets and Liabilities - Not Applicable

O. 5GI Securities - Not Applicable

P. Short Sales - Not Applicable

Q. Prepayment Penalty and Acceleration Fees

	General Account	Separate Account
(1) Number of CUSIPs.....	2	
(2) Aggregate amount of investment income.....	\$..... 100,237	\$.....

R. Reporting Entity's Share of Cash Pool by Asset type - Not Applicable

**6. Joint Ventures, Partnerships and Limited Liability Companies**

A. Investments in Joint Ventures, Partnerships or Limited Liability Companies that Exceed 10% of Admitted Assets

The Company did not have any investments in joint ventures, partnerships, or limited liability companies that exceeded 10% of total admitted assets as of March 31, 2021 and December 31, 2020, respectively.

## Notes to the Financial Statements

### 6. Joint Ventures, Partnerships and Limited Liability Companies (Continued)

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

The Company recognizes impairments when it is probable that it will be unable to recover the carrying amount of the investment or there is evidence indicating inability of the investee to sustain earnings which would justify the carrying value of the investment. The Company did not have any impairment in joint ventures, partnerships, or limited liability companies as of March 31, 2021 and December 31, 2020, respectively.

### 7. Investment Income

The Company did not have any due and accrued income over 90 days past due that was excluded from surplus as of March 31, 2021 and December 31, 2020, respectively.

### 8. Derivative Instruments

#### A. Derivatives under SSAP No. 86 - Derivatives

- (1) The Company owns equity index options to limit its net exposure to equity market risk. The Company enters into equity index future contracts through exchange to hedge the general business risk. The Company receives collateral from its derivative counterparties to limit the risk of nonperformance by the counterparties.
- (2) The Company holds equity futures to hedge general business risks associated with equity markets. The total carrying value of derivative assets were \$5,820 and \$1,528,656 as of March 31, 2021 and December 31, 2020, respectively.
- (3) None of the Company's derivatives qualify for hedge accounting under SSAP No. 86 - *Derivatives*; they are accounted for under the fair value method of accounting, with changes in fair value recorded as unrealized investment gains or losses. The realized gains/losses are recorded at the option expiration date.
- (4) Derivative contracts with financing premiums - Not Applicable
- (5) Net gain or loss recognized - Not Applicable
- (6) Net gain or loss recognized from derivatives no longer qualifying for hedge accounting - Not Applicable
- (7) Derivatives accounted for as cash flow hedges of a forecasted transaction - Not Applicable
- (8) Premium Cost for Derivative Contracts - Not Applicable

#### B. Derivatives under SSAP No. 108 - Derivative Hedging Variable Annuity Guarantees (Life/Fraternal Only) - Not Applicable

### 9. Income Taxes - No Significant Changes

### 10. Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

#### A. Nature of Relationships

On February 1, 2021, KKR & Co. Inc. ("KKR") indirectly acquired a majority interest in First Allmerica Financial Life Insurance Company ("FAFLIC") following the merger of Global Atlantic Financial Group Limited ("GAFGL") and Magnolia Merger Sub Limited, with GAFGL as the surviving entity of the merger transaction. Prior to the merger transaction, Magnolia Merger Sub Limited was a Bermuda exempted company, a direct wholly owned subsidiary of Magnolia Parent LLC (now known as The Global Atlantic Financial Group LLC or "TGAFGL") and an indirect subsidiary of KKR. Accordingly, TGAFGL is now the holding company of GAFGL and KKR is deemed the ultimate controlling person of FAFLIC.

In connection with the merger transaction, on February 1, 2021, FAFLIC entered into an investment management agreement with Kohlberg Kravis Roberts & Co. L.P., a Delaware limited partnership and KKR subsidiary.

The Company is organized as a stock life insurance company and is a wholly-owned direct subsidiary of Commonwealth Annuity. Commonwealth Annuity is a wholly-owned indirect subsidiary of TGAFGL, a Bermuda Company.

KKR Magnolia Holdings LLC owns a total of approximately 61% of the outstanding ordinary shares of TGAFGL; the remaining investors, none of whom own more than 9.9%, own the remaining approximately 39% of the outstanding ordinary shares.

The Company owns market traded bonds of KKR, with an NAIC rating of 1, a carrying value of \$5,039,433, and a market value of \$6,096,291, as of March 31, 2021. The purchase of these securities constituted arms-length transactions.

At December 31, 2020, The Goldman Sachs Group, Inc. (Goldman Sachs) owned a total of approximately 22% of the outstanding ordinary shares of GAFGL; the remaining investors, none of whom own more than 7.0%, own the remaining approximately 78% of the outstanding ordinary shares.

The Company owns market traded bonds of Goldman Sachs, with an NAIC rating of 2, a carrying value of \$13,587,112, and a market value of \$17,864,618, as of December 31, 2020. The purchase of these securities constituted arms-length transactions.

#### B. Detail of Transactions Greater than ½ of 1% of total admitted assets:

As of March 31, 2021, no transactions greater than 1/2 of 1% of net admitted assets had occurred.

In December 2020, having received the approval of the Massachusetts Division of Insurance, the Company distributed a \$100,000,000 extraordinary dividend to its parent, Commonwealth Annuity.

#### C. Transactions With Related Party Who Are Not Reported on Schedule Y - None

#### D. Amounts due to or from Related Parties

The Company pays portfolio management fees to Kohlberg Kravis Roberts & Co ("KKR"). This resulted in a payable to KKR of \$727,874 and \$0 as of March 31, 2021 and December 31, 2020, respectively.

The Company had a payable due to Goldman Sachs Asset Management L.P. (GSAM) related to portfolio management fees of \$674,314 as of December 31, 2020.

As of March 31, 2021, the Company reported a receivable from parent, subsidiaries and affiliates of \$0 and a payable of \$1,449,265. As of December 31, 2020, the Company reported a receivable from parent, subsidiaries and affiliates of \$0 and a payable of \$1,493,059. Intercompany balances are settled on a monthly basis.

## Notes to the Financial Statements

### 10. Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties (Continued)

#### E. Management, Service Contracts, Cost Sharing Arrangements

The Company has entered into administration, shared services, management services, and investment management services agreements with related parties. These affiliates provide legal, compliance, technology, operations, financial reporting, human resources, risk management, distribution services, use of facilities and such other services as the parties may agree to from time to time. The Company recorded expenses for these agreements of \$727,874 and \$2,869,651 for the years ended March 31, 2021 and December 31, 2020, respectively.

The Company has agreements with affiliated parties to receive and pay certain fee income and expenses related to policyholder administration of \$27,956 and \$1,030,650 as of March 31, 2021 and December 31, 2020, respectively and had a net \$27,956 and \$251,369 receivable at March 31, 2021 and December 31, 2020, respectively.

#### F. Guarantees or Contingencies for Related Parties

On December 19, 2012, Commonwealth Annuity entered into an agreement to guarantee the performance of the Company, related to a reinsured block of fixed annuities.

#### G. Nature of Relationships that Could Affect Operations

The Company has entered into a Services and Expenses Agreement, with GAFC, as amended, pursuant to which GAFC and other affiliates will provide certain services to the Company, including, but not limited to, seconding employees and providing management services, administrative support, and use of facilities.

#### H. Amount Deducted for Investment in Upstream Company - Not Applicable

#### I. Detail of Investments in Affiliates Greater Than 10% of Admitted Assets - Not Applicable

#### J. Write-Down for Impairments of Investments in Subsidiary Controlled or Affiliated Companies - Not Applicable

#### K. Foreign Subsidiary Value Using CARVM - Not Applicable

#### L. Downstream Holding Company Value Using Look-Through Method - Not Applicable

#### M. All SCA Investments - Not Applicable

#### N. Investment in Insurance SCAs - Not Applicable

#### O. SCA and SSAP No. 48 Entity Loss Tracking - None

### 11. Debt

#### A. Debt, Including Capital Notes - Not Applicable

#### B. FHLB (Federal Home Loan Bank) Agreements - Not Applicable

### 12. Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans

#### A. Defined Benefit Plan - Not Applicable

#### B. Investment Policies and Strategies of Plan Assets - Not Applicable

#### C. Fair Value of Each Class of Plan Assets - Not Applicable

#### D. Expected Long-Term Rate of Return for the Plan Assets - Not Applicable

#### E. Defined Contribution Plans

In 2014, the Company assumed, and received assets for, a nonqualified defined contribution pension plan covering career distribution system agents. The balance of this obligation was \$3,070,313 and \$3,048,014 as of March 31, 2021 and December 31, 2020, respectively. There were no expenses recognized in association with this plan for the three months and year ended March 31, 2021 and December 31, 2020.

#### F. Multiemployer Plans - Not Applicable

#### G. Consolidated/Holding Company Plans

The Company is allocated a share of the costs of the GAFC employee-sponsored defined contribution plans. GAFC matches 100% of the first 6% of eligible compensation contributed by participants. Participants are 100% vested in the 4% employer safe harbor matching contribution. Participants vest in the additional 2% employer matching contribution on a graded schedule over five years, based upon years of service. The allocated expense for the years ended March 31, 2021 and December 31, 2020 was \$209,025 and \$542,953, respectively.

#### H. Postemployment Benefits and Compensated Absences - Not Applicable

#### I. Impact of Medicare Modernization Act on Postretirement Benefits (INT 04-17) - Not Applicable

### 13. Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

#### A. The Company has 1,000,000 shares authorized, 500,001 shares issued and outstanding, par value \$10.00 per share.

#### B. The Company has no preferred stock outstanding.

#### C. Massachusetts has enacted laws governing the payment of dividends and other distributions to stockholders by insurers. These laws affect the dividend paying ability of the Company. Pursuant to Massachusetts statutes, the maximum amount of dividends and other distributions that an insurer may pay in any twelve month period, without prior approval of the MA DOI, is limited to the greater of the Company's statutory net gains from operations of the preceding December 31 or 10% of the statutory policyholder's surplus as of the preceding December 31. Any dividend from the Company to Commonwealth Annuity requires prior approval of the MA DOI since dividends may not be paid from negative unassigned funds.

#### D. In December 2020, having received the approval of the Massachusetts Division of Insurance, the Company distributed a \$100,000,000 extraordinary dividend to its parent, Commonwealth Annuity. The entire \$100,000,000, being in excess of undistributed earnings, was accounted for as a return of capital.

#### E. Within the limitations of (C) above, there are no restrictions placed on the portion of Company profits that may be paid as ordinary dividends to stockholders

## Notes to the Financial Statements

### 13. Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations (Continued)

- F. The Company has no restrictions on the use of the Company's unassigned surplus and all unassigned surplus is held for the benefit of the shareholders.
- G. The Company has no surplus advances.
- H. Stock Held for Special Purposes  
None of the Company's stock is held for special purposes.
- I. Changes in Special Surplus Funds - Not Applicable
- J. Unassigned Funds (Surplus)  
The portion of unassigned funds (surplus) represented or reduced by cumulative unrealized gains and losses are \$2,963,509 and \$3,526,974, at March 31, 2021 and December 31, 2020, respectively.
- K. Company-Issued Surplus Debentures or Similar Obligations - Not Applicable
- L. Impact of Any Restatement Due to Prior Quasi-Reorganizations - Not Applicable
- M. Effective Date(s) of Quasi-Reorganizations in the Prior 10 Years - Not Applicable

### 14. Liabilities, Contingencies and Assessments

- A. Contingent Commitments
  - (1) Commitments or contingent commitment(s) to an SCA entity, joint venture, partnership, or limited liability company  
The Company invests in certain joint ventures, limited liability companies (LLC's) and partnerships, and in some cases makes a commitment for additional investment up to a maximum invested amount.  
  
As of March 31, 2021, commitments to make additional investments to joint ventures, LLC's and partnerships total \$4,605,452.
  - (2) Nature and circumstances of guarantee - None
  - (3) Aggregate compilation of guarantee obligations - None
- B. Assessments
  - (1) Unfavorable economic conditions may contribute to an increase in the number of insurance companies that are under regulatory supervision. This may result in an increase in mandatory assessments by state guaranty funds, or voluntary payments by solvent insurance companies to cover losses to policyholders of insolvent or rehabilitated companies. Mandatory assessments, which are subject to statutory limits, can be partially recovered through a reduction in future premium taxes in some states. The Company is not able to reasonably estimate the potential impact of any such future assessments or voluntary payments.
  - (3) Guaranty fund liabilities and assets related to long-term care insolvencies - None
- C. Gain Contingencies - Not Applicable
- D. Claims Related Extra Contractual Obligation and Bad Faith Losses Stemming from Lawsuits - Not Applicable
- E. Joint and Several Liabilities - Not Applicable
- F. All Other Contingencies

The Company may be involved from time to time in judicial, regulatory and arbitration proceedings concerning matters arising in connection with the conduct of its business. The Hanover Insurance Group, Inc. (THG) has agreed to indemnify the Company and Commonwealth Annuity with respect to certain of these matters as provided in the Stock Purchase Agreement. Management believes, based on currently available information, that the results of such proceedings, in the aggregate, will not have a material adverse effect on the Company's financial condition. Given the inherent difficulty of predicting the outcome of the Company's litigation and regulatory matters, particularly in cases or proceedings in which substantial or indeterminate damages or fines are sought, the Company cannot estimate losses, or ranges of losses, for cases or proceedings where there is only a reasonable possibility that a loss may be incurred. However, the Company believes that at the present time there are no pending or threatened lawsuits or regulatory proceedings that are reasonably likely to have a material adverse effect on the Company's consolidated financial position.

In addition, the Company is involved, from time to time, in investigations and proceedings by governmental and self-regulatory agencies, which may include investigations into such matters as revenue sharing, claims payment practices, unclaimed property escheatment practices, and other matters. A number of companies have announced settlements of enforcement actions related to such matters with various regulatory agencies, including the SEC, which has included a range of monetary penalties and restitution. The Company is not currently involved in any such investigations or proceedings, though there can be no assurance that such investigations or proceedings may not arise in the future.

In connection with the process of converting over 500,000 in-force life insurance policies (representing policies for both the Company and Accordia) from systems managed by Athene Holdings Limited to the platform of one of our third party service providers DXC, or the "Conversion," the Company and Accordia expect to incur a variety of litigation-related costs. On June 28, 2018 a subsidiary of Athene and FAFLIC entered into a consent order with the New York State Department of Financial Services, or "NYSDFS," relating to the NYSDFS' market conduct examination findings that related primarily to disruptions in servicing caused by the Conversion. Pursuant to the consent order, Athene paid the NYSDFS a fine of \$15 million and will also take corrective actions and provide remediation to policyholders impacted by the Conversion. The agreements between the Company, Commonwealth Annuity and Athene provide indemnities to Athene, including for fines and penalties resulting from violations of law. Commonwealth Annuity has reimbursed Athene an amount equal to the NYSDFS fine in July, 2018. Additionally, the Company has put up a reserve of \$4.2 million for costs related to certain aspects of the corrective actions agreed under the consent order. The Company anticipates additional regulatory, restitution and legal costs associated with the investigation, defense, and settlement of potential claims related to the Conversion.

The Company's ultimate legal and financial responsibility cannot be estimated at this time.

The Company's sister company, Accordia Life and Annuity Company is a defendant in a putative policyholder class action, *Clapp, et al. v. Accordia Life and Annuity Company, et al.*, in the Central District of Illinois. Plaintiffs in *Clapp* filed a Motion for Preliminary Approval of Class Settlement on May 10, 2019, which was granted by the Court on June 7, 2019. The Court granted final approval on June 23, 2020. Although the Company is not a party to that lawsuit, it is a released party pursuant to the terms of the settlement agreement and some FAFLIC policyholders are members of the settlement class.

## Notes to the Financial Statements

### 15. Leases

- A. Lessee Operating Lease - Not Applicable
- B. Lessor Leases - Not Applicable

### 16. Information About Financial Instruments With Off-Balance-Sheet Risk And Financial Instruments With Concentrations of Credit Risk

Credit risk is managed by entering into transactions with creditworthy counterparties and obtaining full collaterals from counterparties. The Company did not hold over the counter derivative contracts as of March 31, 2021. The exchange-traded derivatives are affected through a regulated exchange and positions are marked to market on a daily basis, the Company has little exposure to credit-related losses in the event of nonperformance by counterparties to such financial instruments.

- 1. Face Amount of the Company's Financial Instruments with Off-Balance-Sheet Risk - Not Applicable
- 2. Nature of Terms - Not Applicable
- 3. Exposure to Credit Related Losses - Not Applicable
- 4. Collateral Policy - Not Applicable

### 17. Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

- A. Transfers of Receivables Reported as Sales - Not Applicable
- B. Transfers and Servicing of Financial Assets - Not Applicable
- C. Wash Sales - None

### 18. Gain or Loss to the Reporting Entity from Uninsured Plans and the Uninsured Portion of Partially Insured Plans

- A. ASO Plans - Not Applicable
- B. ASC Plans - Not Applicable
- C. Medicare or Other Similarly Structured Cost Based Reimbursement Contract - Not Applicable

### 19. Direct Premium Written/Produced by Managing General Agents/Third Party Administrators - Not Applicable

### 20. Fair Value Measurements

- A. Fair Value Measurement

As of March 31, 2021, the Company's assets and liabilities carried at fair value consist of separate account funds are classified as Level 1 in the fair value hierarchy.

Derivatives consist of short equity futures classified as Level 1 in the fair value hierarchy. The Company did not own any Level 3 securities carried at fair value as of March 30, 2021 and December 31, 2020.

- (1) Fair value measurements at reporting date

Description for each class of asset or liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
a. Assets at fair value					
Derivative Assets	\$ 5,820	\$	\$	\$	\$ 5,820
Separate Accounts	138,734,836				138,734,836
Total assets at fair value/NAV	<u>\$ 138,740,656</u>	<u>\$</u>	<u>\$</u>	<u>\$</u>	<u>\$ 138,740,656</u>
b. Liabilities at fair value					
Derivative Liabilities	\$	\$	\$	\$	\$
Total liabilities at fair value	<u>\$</u>	<u>\$</u>	<u>\$</u>	<u>\$</u>	<u>\$</u>

- (2) Fair value measurements in Level 3 of the fair value hierarchy - None

- (3) Transfers Between Level 1 and Level 2

There were no transfers between Levels 1 and 2 during the current year.

- (4) Fair Value Inputs Level 2 and Level 3

#### Bonds

In accordance with the NAIC Purposes and Procedures Manual of the NAIC Investment Analysis Office, bonds rated 6 are carried at the lower of amortized cost or fair value. As of March 31, 2021 and December 31, 2020, the Company did not own any bonds rated 6.

#### Separate Account Assets

The estimated fair value of assets held in separate accounts is based on quoted market prices. Separate account assets representing contract holder funds are measured at fair value and reported as a summary total in the Statement of Assets, with an equivalent summary total reported for related liabilities. The market value adjusted annuity is comprised of bonds, in which the fair value is based on external vendor prices. Based on the level of observable activity, these bonds will be measured at either Level 1 or Level 2.

#### Derivatives

The Company enters into certain OTC derivatives, primarily equity index options to hedge the growth in interests credited for the indexed universal life insurance products. The Company values the OTC options utilizing the Black-Scholes models. The Company also compares the derivative valuations to valuations to validate the model outputs. For OTC derivatives that trade in liquid markets, model inputs can generally be verified and model selection does not involve significant management judgment. Such instruments are typically classified within Level 2 of the fair value hierarchy.

- (5) Derivatives - Not Applicable

## Notes to the Financial Statements

### 20. Fair Value Measurements (Continued)

#### B. Other Fair Value Disclosures

No additional disclosures are required pertaining to fair value measurement.

#### C. Fair Values for All Financial Instruments by Level 1, 2 and 3

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 2,317,733,375	\$ 2,048,554,766	\$ 7,582,477	\$ 2,271,099,896	\$ 39,051,002		
Mortgage Loans	6,035,278	5,827,409			6,035,278		
Other Invested Assets	1,721,571	10,733,816		1,721,571			9,012,246
Cash and Equivalents	67,905,426	67,905,426	67,905,426				
Derivatives	5,820	5,820	5,820				
Total Assets	2,393,401,470	2,133,027,237	75,493,723	2,272,821,467	45,086,280		9,012,246
Derivative Liabilities							
Total Liabilities							

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

As of March 31, 2021, the Company owned 2 financial instruments that were not practicable to estimate fair value.

Type or Class of Financial Instrument	Carrying Value	Effective Interest Rate	Maturity Date	Explanation
BA Common Stock	\$ 9,012,246	%		1

#### Explanations

1: For our equity method investments, our carrying amount generally is our share of the net asset value of the funds or the partnerships, which approximates fair

#### E. Nature and Risk of Investments Reported at NAV - Not Applicable

### 21. Other Items

#### A. Unusual or Infrequent Items - Not Applicable

#### B. Troubled Debt Restructuring - Not Applicable

#### C. Other Disclosures

Assets values of \$11,960,005 and \$11,979,307 at March 31, 2021 and December 31, 2020, respectively, were on deposit with government authorities or trustees as required by law.

The Company previously completed a conversion to a new life insurance administration system. In a limited number of cases, as a result of the conversion, the Company is using estimates for certain policyholder balances recorded in the financial statements. Any variances to the estimates will be recorded in future periods if estimates are revised or no longer utilized.

Effective October 1, 2020, the Company entered into a 90% quota share Funds Withheld Retrocession Reinsurance Agreement with Accordia Life and Annuity Company (Accordia). The business covered under this agreement consists of whole life, term, and universal life policies assumed under the Non NLG, Non-Financed NLG and JANY reinsurance agreements and policies novated from Athene Life Insurance Company of New York (ALICNY). At December 31, 2020, the Company ceded \$940,712,245 of premium revenue, \$889,156,294 of reserves, and \$32,500,000 of commission expense allowance to Accordia.

Note 14 references "remediation to policyholders impacted by the Conversion" as directed by the NYSDFS. In compliance with this directive, one of these remediation options was to allow policyholders to pay current premiums on a go forward basis and any premium in arrears (i.e. premium that had not been billed) would be applied to the policy, to be collected at the time the policy terminates (e.g. surrender or death). The premium that has been applied under this option has been set up as lien against the policy. In accordance with statutory guidance it is being treated as a non-admitted asset.

#### D. Business Interruption Insurance Recoveries

The Company did not have any business interruption insurance recoveries as of March 31, 2021 and December 31, 2020.

#### E. State Transferable and Non-Transferable Tax Credits - Not Applicable

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

(1) While the Company holds no direct investments in subprime mortgage loans, the Company may have limited exposure to subprime borrowers through direct investments in primarily investment grade subprime residential mortgage-backed securities. The Company's definition of subprime is predominantly based on borrower statistics from a residential pool of mortgages. Included in the statistics evaluated is the average credit score of the borrower, the loan-to-value ratio, the debt-to-income statistics, and the diversity of all these statistics across the borrower profile. As is true for all securities in the Company's portfolio, the entire mortgage-backed asset portfolio is reviewed for impairments at least quarterly. Additionally, reviews of specific mortgage-backed securities are made on a periodic basis by reviewing both the unrealized gain/loss as well as changes to the underlying statistics. Included in the analysis are current delinquency and default statistics, as well as the current and original levels of subordination on the security.

(2) Direct exposure through investments in subprime mortgage loans - Not Applicable

(3) Direct exposure through other investments

The Company holds the following residential mortgage backed securities with subprime exposure as of March 31, 2021.

**Notes to the Financial Statements**

**21. Other Items (Continued)**

	Actual Cost	Book/Adjusted Carrying Value (Excluding Interest)	Fair Value	Other-Than-Temporary Impairment Losses Recognized
a. Residential mortgage-backed securities.....	\$ 12,290,954	\$ 11,614,535	\$ 16,433,280	\$ .....
b. Commercial mortgage-backed securities.....	.....	.....	.....	.....
c. Collateralized debt obligations.....	.....	.....	.....	.....
d. Structured securities.....	.....	.....	.....	.....
e. Equity investment in SCAs.....	.....	.....	.....	.....
f. Other assets.....	.....	.....	.....	.....
g. Total.....	<u>\$ 12,290,954</u>	<u>\$ 11,614,535</u>	<u>\$ 16,433,280</u>	<u>\$ .....</u>

(4) Underwriting exposure to subprime mortgage risk through Mortgage Guaranty or Financial Guaranty insurance coverage - Not Applicable

G. Retained Assets - Not Applicable

H. Insurance-Linked Securities (ILS) Contracts - Not Applicable

I. The Amount That Could Be Realized on Life Insurance Where the Reporting Entity is Owner and Beneficiary or Has Otherwise Obtained Rights to Control the Policy - None

**22. Events Subsequent**

Type I – Recognized Subsequent Events – No Type I subsequent events to report.

Type II – No Type II subsequent events to report.

Subsequent events have been considered through May 13, 2021.

**COVID-19**

The COVID-19 outbreak is currently impacting the United States and many countries around the world. Due to the recent and rapidly evolving nature of these events, the Company is unable to estimate the full impact at this time. However, at this time, the Company does not believe the situation will materially impact the Company's liability or capital position.

**23. Reinsurance - No Significant Changes**

**24. Retrospectively Rated Contracts & Contracts Subject to Redetermination**

The Company does not have any retrospectively rated contracts or contract subject to redetermination.

A. Method Used to Estimate - Not Applicable

B. Method Used to Record - Not Applicable

C. Amount and Percent of Net Retrospective Premiums - Not Applicable

D. Medical Loss Ratio Rebates Required Pursuant to the Public Health Service Act - Not Applicable

E. Risk-Sharing Provisions of the Affordable Care Act (ACA)

(1) Accident and health insurance premium subject to the Affordable Care Act risk-sharing provisions

Accident and health insurance premium subject to the Affordable Care Act risk-sharing provisions

Did the reporting entity write accident and health insurance premium which is subject to the Affordable Care Act risk sharing provisions?

NO

(2) Impact of Risk-Sharing Provisions of the Affordable Care Act on admitted assets, liabilities and revenue for the current year - Not Applicable

(3) Roll-forward of prior year ACA risk-sharing provisions for the following asset (gross of any nonadmission) and liability balances, along with the reasons for adjustments to prior year balance - Not Applicable

(4) Roll-forward of risk corridors asset and liability balances by program benefit year - Not Applicable

(5) ACA risk corridors receivable as of reporting date - Not Applicable

**25. Change in Incurred Losses and Loss Adjustment Expenses**

A. Reasons for Changes in the Provision for Incurred Loss and Loss Adjustment Expenses Attributable to Insured Events of Prior Years

The Company does not have any change in incurred loss adjustment expenses.

B. Significant Changes in Methodologies and Assumptions Used in Calculating the Liability for Unpaid Losses and Loss Adjustment Expenses

The Company does not have any change in methodologies and assumptions used in calculating the liability for unpaid losses and loss adjustment expenses.

**26. Intercompany Pooling Arrangements - Not Applicable**

**27. Structured Settlements**

The Company does not have any structured settlements.

**28. Health Care Receivables - Not Applicable**

**29. Participating Policies - No Significant Changes**

**30. Premium Deficiency Reserves - Not Applicable**

## Notes to the Financial Statements

- 31. **Reserves for Life Contracts and Annuity Contracts** - No Significant Changes
- 32. **Analysis of Annuity Actuarial Reserves and Deposit Type Contract Liabilities by Withdrawal Characteristics** - No Significant Changes
- 33. **Analysis of Life Actuarial Reserves by Withdrawal Characteristics** - No Significant Changes
- 34. **Premiums and Annuity Considerations Deferred and Uncollected** - No Significant Changes
- 35. **Separate Accounts** - No Significant Changes
- 36. **Loss/Claim Adjustment Expenses** - Not Applicable

# GENERAL INTERROGATORIES

## PART 1 - COMMON INTERROGATORIES

### GENERAL

- 1.1 Did the reporting entity experience any material transactions requiring the filing of Disclosure of Material Transactions with the State of Domicile, as required by the Model Act? ..... Yes [ ] No [ X ]
- 1.2 If yes, has the report been filed with the domiciliary state? ..... Yes [ ] No [ X ]
- 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 [ X ]
- 2.2 If yes, date of change: .....
- 3.1 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 [ X ] No [ ]  
If yes, complete Schedule Y, Parts 1 and 1A.
- 3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? ..... Yes [ X ] No [ ]
- 3.3 If the response to 3.2 is yes, provide a brief description of those changes.  
On February 1, 2021, KKR & Co. Inc. ("KKR") indirectly acquired a majority interest in First Allmerica Financial Life Insurance Company ("FAFLIC") following the merger of Global Atlantic Financial Group Limited ("GAFGL") and Magnolia Merger Sub Limited, with GAFGL as the surviving entity of the merger transaction. Prior to the merger transaction, Magnolia Merger Sub Limited was a Bermuda exempted company, a direct wholly owned subsidiary of Magnolia Parent LLC (now known as The Global Atlantic Financial Group LLC or "TGAFGL") and an indirect subsidiary of KKR. Accordingly, TGAFGL is now the holding company of GAFGL and KKR is deemed the ultimate controlling person of FAFLIC. In connection with the merger transaction, on February 1, 2021, FAFLIC entered into an investment management agreement with Kohlberg Kravis Roberts & Co. L.P., a Delaware limited partnership and KKR subsidiary.
- 3.4 Is the reporting entity publicly traded or a member of a publicly traded group? ..... Yes [ X ] No [ ]
- 3.5 If the response to 3.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group. .... 0001404912
- 4.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? ..... Yes [ ] No [ X ]  
If yes, complete and file the merger history data file with the NAIC.
- 4.2 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

5. If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved? ..... Yes [ ] No [ X ] N/A [ ]  
If yes, attach an explanation.
- 6.1 State as of what date the latest financial examination of the reporting entity was made or is being made. .... 12/31/2019
- 6.2 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. .... 12/31/2014
- 6.3 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). .... 05/27/2016
- 6.4 By what department or departments?  
Massachusetts Division of Insurance
- 6.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments? ..... Yes [ X ] No [ ] N/A [ ]
- 6.6 Have all of the recommendations within the latest financial examination report been complied with? ..... Yes [ X ] No [ ] N/A [ ]
- 7.1 Has this 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 [ X ]
- 7.2 If yes, give full information:
- 8.1 Is the company a subsidiary of a bank holding company regulated by the Federal Reserve Board? ..... Yes [ X ] No [ ]
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.  
The Goldman Sachs Group, Inc.
- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? ..... Yes [ X ] No [ ]
- 8.4 If response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

1 Affiliate Name	2 Location (City, State)	3 FRB	4 OCC	5 FDIC	6 SEC
REDI Global Technologies LLC. ....	New York, NY .....	NO	NO	NO	YES
Mercer Allied Company, L.P. ....	Saratoga Springs, NY .....	NO	NO	NO	YES
Global Atlantic Investment Advisors, LLC .....	Indianapolis, Indiana .....	NO	NO	NO	YES
Global Atlantic Distributors, LLC .....	Simsbury, Connecticut .....	NO	NO	NO	YES
KKR Credit Advisors (Singapore) Pte. Ltd. ....	Singapore .....	NO	NO	NO	YES
KKR Registered Advisor LLC .....	New York, NY .....	NO	NO	NO	YES
Kohlberg Kravis Roberts & Co. L.P. ....	New York, NY .....	NO	NO	NO	YES
FS/KKR Advisor, LLC .....	New York, NY .....	NO	NO	NO	YES
KKR Credit Advisors (US) LLC .....	San Francisco, CA .....	NO	NO	NO	YES
KKR Capital Markets LLC .....	New York, NY .....	NO	NO	NO	YES
MCS Capital Markets LLC .....	New York, NY .....	NO	NO	NO	YES

## GENERAL INTERROGATORIES

- 9.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? ..... Yes  No   
 (a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;  
 (b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;  
 (c) Compliance with applicable governmental laws, rules and regulations;  
 (d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and  
 (e) Accountability for adherence to the code.
- 9.11 If the response to 9.1 is No, please explain:
- 9.2 Has the code of ethics for senior managers been amended? ..... Yes  No
- 9.21 If the response to 9.2 is Yes, provide information related to amendment(s).
- 9.3 Have any provisions of the code of ethics been waived for any of the specified officers? ..... Yes  No
- 9.31 If the response to 9.3 is Yes, provide the nature of any waiver(s).

### FINANCIAL

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

### INVESTMENT

- 11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.) ..... Yes  No
- 11.2 If yes, give full and complete information relating thereto:

12. Amount of real estate and mortgages held in other invested assets in Schedule BA: ..... \$ .....
13. Amount of real estate and mortgages held in short-term investments: ..... \$ .....
- 14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates? ..... Yes  No
- 14.2 If yes, please complete the following:

	1 Prior Year-End Book/Adjusted Carrying Value	2 Current Quarter Book/Adjusted Carrying Value
14.21 Bonds .....	\$ 13,587,112	\$ 5,039,433
14.22 Preferred Stock .....	\$ .....	\$ .....
14.23 Common Stock .....	\$ .....	\$ .....
14.24 Short-Term Investments .....	\$ .....	\$ .....
14.25 Mortgage Loans on Real Estate .....	\$ .....	\$ .....
14.26 All Other .....	\$ .....	\$ .....
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26) .....	\$ 13,587,112	\$ 5,039,433
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above .....	\$ .....	\$ .....

- 15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB? ..... Yes  No
- 15.2 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.
16. For the reporting entity's security lending program, state the amount of the following as of the current statement date:
- 16.1 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2. .... \$ .....
- 16.2 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2. .... \$ .....
- 16.3 Total payable for securities lending reported on the liability page. .... \$ .....

## GENERAL INTERROGATORIES

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

1 Name of Custodian(s)	2 Custodian Address
U.S Bank N.A .....	1025 Connecticut Avenue, NM Suite 517, Washington DC 20036 .....
Bank of New York Mellon .....	One Wall Street, New York, NY 10286 .....

- 17.2 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)

- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? ..... Yes [  ] No [  ]
- 17.4 If yes, give full information relating thereto:

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

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

1 Name of Firm or Individual	2 Affiliation
Internal Global Atlantic Investment Team .....	I.....
Kohlberg Kravis Roberts & Co. L.P. ....	A.....
Goldman Sachs Asset Management CL0, Corp. ....	U.....

- 17.5097 For those firms/individuals listed in the table for Question 17.5, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's invested assets? ..... Yes [  ] No [  ]
- 17.5098 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 17.5, does the total assets under management aggregate to more than 50% of the reporting entity's invested assets? ..... Yes [  ] No [  ]

- 17.6 For those firms or individuals listed in the table for 17.5 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1	2	3	4	5
Central Registration Depository Number	Name of Firm or Individual	Legal Entity Identifier (LEI)	Registered With	Investment Management Agreement (IMA) Filed
1399770 .....	Kohlberg Kravis Roberts & Co. L.P. ....	K3NEK11EF7N3JVJE7V46 .....		DS.....
107738 .....	Goldman Sachs Asset Management CL0, Corp. ....	5493000C7DKPYVEOMA87 .....		OS.....

- 18.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Investment Analysis Office been followed? ..... Yes [  ] No [  ]
- 18.2 If no, list exceptions:

19. By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designated 5GI security:
- Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
  - Issuer or obligor is current on all contracted interest and principal payments.
  - The insurer has an actual expectation of ultimate payment of all contracted interest and principal.
- Has the reporting entity self-designated 5GI securities? ..... Yes [  ] No [  ]

20. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:
- The security was purchased prior to January 1, 2018.
  - The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
  - The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as a NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
  - The reporting entity is not permitted to share this credit rating of the PL security with the SVO.
- Has the reporting entity self-designated PLGI securities? ..... Yes [  ] No [  ]

21. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:
- The shares were purchased prior to January 1, 2019.
  - The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
  - The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.
  - The fund only or predominantly holds bonds in its portfolio.
  - The current reported NAIC Designation was derived from the public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO.
  - The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.
- Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria? ..... Yes [  ] No [  ]

## GENERAL INTERROGATORIES

### PART 2 - LIFE AND ACCIDENT AND HEALTH COMPANIES/FRATERNAL BENEFIT SOCIETIES

**Life and Accident Health Companies/Fraternal Benefit Societies:**

1. Report the statement value of mortgage loans at the end of this reporting period for the following categories: 1  
Amount
- 1.1 Long-Term Mortgages In Good Standing
- 1.11 Farm Mortgages ..... \$ .....
- 1.12 Residential Mortgages ..... \$ .....
- 1.13 Commercial Mortgages ..... \$ ..... 5,827,409
- 1.14 Total Mortgages in Good Standing ..... \$ ..... 5,827,409
- 1.2 Long-Term Mortgages In Good Standing with Restructured Terms
- 1.21 Total Mortgages in Good Standing with Restructured Terms ..... \$ .....
- 1.3 Long-Term Mortgage Loans Upon which Interest is Overdue more than Three Months
- 1.31 Farm Mortgages ..... \$ .....
- 1.32 Residential Mortgages ..... \$ .....
- 1.33 Commercial Mortgages ..... \$ .....
- 1.34 Total Mortgages with Interest Overdue more than Three Months ..... \$ .....
- 1.4 Long-Term Mortgage Loans in Process of Foreclosure
- 1.41 Farm Mortgages ..... \$ .....
- 1.42 Residential Mortgages ..... \$ .....
- 1.43 Commercial Mortgages ..... \$ .....
- 1.44 Total Mortgages in Process of Foreclosure ..... \$ .....
- 1.5 Total Mortgage Loans (Lines 1.14 + 1.21 + 1.34 + 1.44) (Page 2, Column 3, Lines 3.1 + 3.2) ..... \$ ..... 5,827,409
- 1.6 Long-Term Mortgages Foreclosed, Properties Transferred to Real Estate in Current Quarter
- 1.61 Farm Mortgages ..... \$ .....
- 1.62 Residential Mortgages ..... \$ .....
- 1.63 Commercial Mortgages ..... \$ .....
- 1.64 Total Mortgages Foreclosed and Transferred to Real Estate ..... \$ .....
2. Operating Percentages:
- 2.1 A&H loss percent ..... %
- 2.2 A&H cost containment percent ..... %
- 2.3 A&H expense percent excluding cost containment expenses ..... %
- 3.1 Do you act as a custodian for health savings accounts? ..... Yes [ ] No [ X ]
- 3.2 If yes, please provide the amount of custodial funds held as of the reporting date ..... \$ .....
- 3.3 Do you act as an administrator for health savings accounts? ..... Yes [ ] No [ X ]
- 3.4 If yes, please provide the balance of the funds administered as of the reporting date ..... \$ .....
4. Is the reporting entity licensed or chartered, registered, qualified, eligible or writing business in at least two states? ..... Yes [ X ] No [ ]
- 4.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? ..... Yes [ ] No [ ]
- Fraternal Benefit Societies Only:**
- 5.1 In all cases where the reporting entity has assumed accident and health risks from another company, provisions should be made in this statement on account of such reinsurances for reserve equal to that which the original company would have been required to establish had it retained the risks. Has this been done? ..... Yes [ ] No [ ] N/A [ ]
- 5.2 If no, explain: .....
- 6.1 Does the reporting entity have outstanding assessments in the form of liens against policy benefits that have increased surplus? ..... Yes [ ] No [ ]
- 6.2 If yes, what is the date(s) of the original lien and the total outstanding balance of liens that remain in surplus?

Date	Outstanding Lien Amount
.....	.....

**SCHEDULE S - CEDED REINSURANCE**

Showing All New Reinsurance Treaties - Current Year to Date

1 NAIC Company Code	2 ID Number	3 Effective Date	4 Name of Reinsurer	5 Domiciliary Jurisdiction	6 Type of Reinsurance Ceded	7 Type of Business Ceded	8 Type of Reinsurer	9 Certified Reinsurer Rating (1 through 6)	10 Effective Date of Certified Reinsurer Rating
<b>NONE</b>									

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE T - PREMIUMS AND ANNUITY CONSIDERATIONS**

Current Year To Date - Allocated by States and Territories

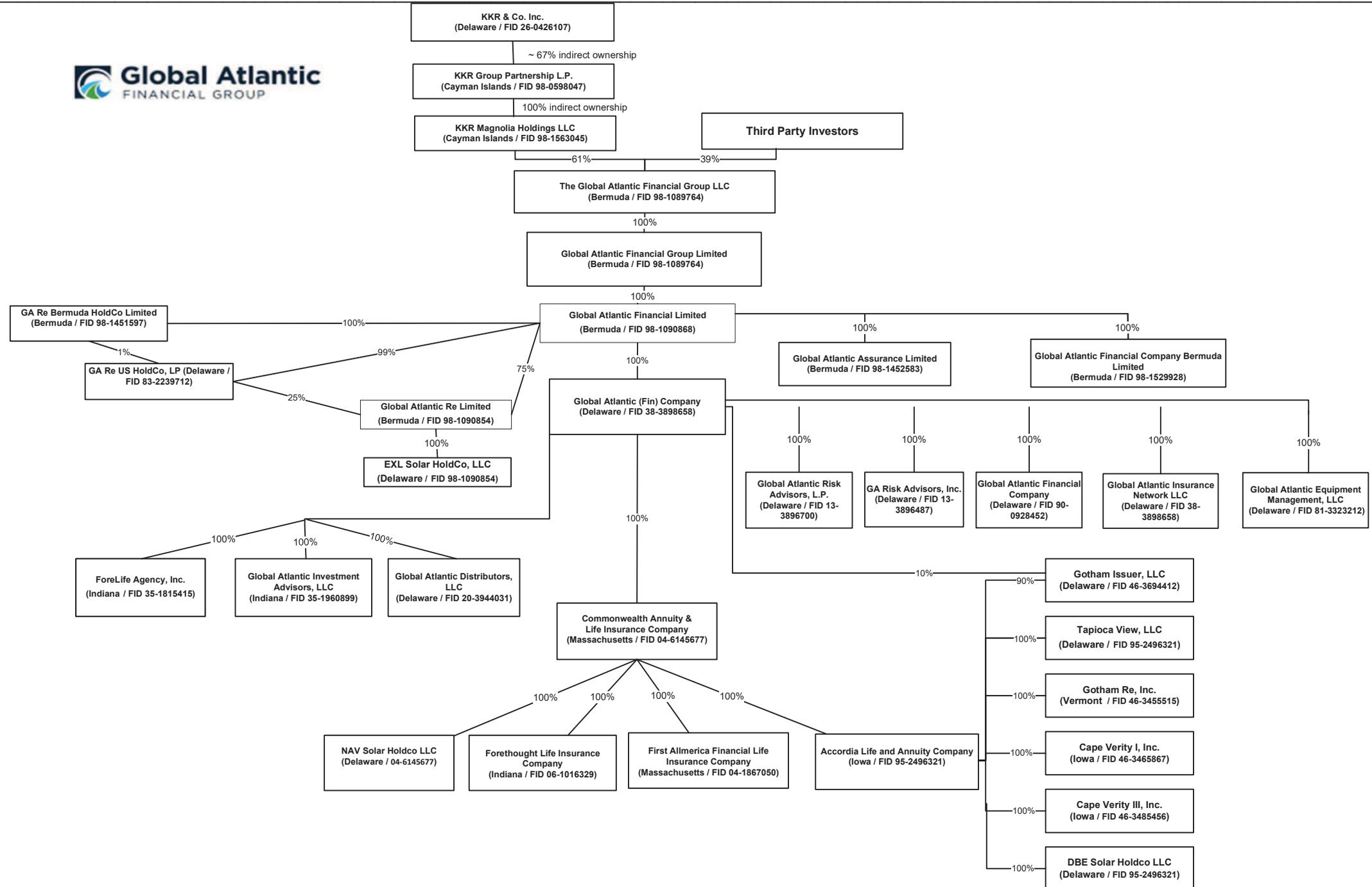
States, Etc.	1	Direct Business Only					7	
		Life Contracts		4	5	6		
	Active Status (a)	2	3				Accident and Health Insurance Premiums, Including Policy, Membership and Other Fees	Other Considerations
		Life Insurance Premiums	Annuity Considerations					
1. Alabama	AL	L	19,517				19,517	
2. Alaska	AK	L	2,044		96		2,140	
3. Arizona	AZ	L	53,974				53,974	
4. Arkansas	AR	L	3,923	4,665	31		8,619	
5. California	CA	L	178,753		88		178,841	
6. Colorado	CO	L	165,959		682		166,641	
7. Connecticut	CT	L	247,758	480			248,238	
8. Delaware	DE	L	10,439				10,439	
9. District of Columbia	DC	L	6,716	10,543			17,259	
10. Florida	FL	L	602,257		276		602,533	
11. Georgia	GA	L	78,944				78,944	
12. Hawaii	HI	L	3,499				3,499	
13. Idaho	ID	L	4,437		114		4,551	
14. Illinois	IL	L	159,503				159,503	
15. Indiana	IN	L	58,123				58,123	
16. Iowa	IA	L	10,057				10,057	
17. Kansas	KS	L	5,079				5,079	
18. Kentucky	KY	L	16,296		221		16,517	
19. Louisiana	LA	L	95,838				95,838	
20. Maine	ME	L	77,189				77,189	
21. Maryland	MD	L	97,974	17,178	26		115,178	
22. Massachusetts	MA	L	179,370	35,000			214,370	
23. Michigan	MI	L	227,829		418		228,247	
24. Minnesota	MN	L	343,953				343,953	
25. Mississippi	MS	L	17,530		111		17,641	
26. Missouri	MO	L	15,266				15,266	
27. Montana	MT	L	2,295				2,295	
28. Nebraska	NE	L	15,207				15,207	
29. Nevada	NV	L	25,404		79		25,483	
30. New Hampshire	NH	L	43,331				43,331	
31. New Jersey	NJ	L	690,141				690,141	
32. New Mexico	NM	L	5,169	55,756	11,168		72,093	
33. New York	NY	L	8,279,179				8,279,179	
34. North Carolina	NC	L	168,162				168,162	
35. North Dakota	ND	L	393		47		440	
36. Ohio	OH	L	93,257				93,257	
37. Oklahoma	OK	L	3,090				3,090	
38. Oregon	OR	L	18,854	4,165			23,019	
39. Pennsylvania	PA	L	246,327				246,327	
40. Rhode Island	RI	L	16,181				16,181	
41. South Carolina	SC	L	83,753				83,753	
42. South Dakota	SD	L	3,410				3,410	
43. Tennessee	TN	L	70,645	3,454			74,099	
44. Texas	TX	L	122,732				122,732	
45. Utah	UT	L	10,699				10,699	
46. Vermont	VT	L	11,103		17		11,120	
47. Virginia	VA	L	161,826				161,826	
48. Washington	WA	L	28,537				28,537	
49. West Virginia	WV	L	2,976				2,976	
50. Wisconsin	WI	L	13,537				13,537	
51. Wyoming	WY	L	6,700				6,700	
52. American Samoa	AS	L						
53. Guam	GU	L		40,692	221		40,913	
54. Puerto Rico	PR	N	22,541				22,541	
55. U.S. Virgin Islands	VI	L	477				477	
56. Northern Mariana Islands	MP	N						
57. Canada	CAN	N	941				941	
58. Aggregate Other Aliens	OT	XXX	25,234				25,234	
59. Subtotal	XXX		12,854,328	171,933	13,595		13,039,856	
90. Reporting entity contributions for employee benefits plans	XXX							
91. Dividends or refunds applied to purchase paid-up additions and annuities	XXX		4,064,352				4,064,352	
92. Dividends or refunds applied to shorten endowment or premium paying period	XXX							
93. Premium or annuity considerations waived under disability or other contract provisions	XXX		115,666				115,666	
94. Aggregate or other amounts not allocable by State	XXX		68,979				68,979	
95. Totals (Direct Business)	XXX		17,103,325	171,933	13,595		17,288,853	
96. Plus Reinsurance Assumed	XXX		4,426,229	632,916	184		5,059,329	
97. Totals (All Business)	XXX		21,529,554	804,849	13,779		22,348,182	
98. Less Reinsurance Ceded	XXX		24,452,633	568,710	13,779		25,035,122	
99. Totals (All Business) less Reinsurance Ceded	XXX		(2,923,079)	236,139			(2,686,940)	
DETAILS OF WRITE-INS								
58001. ZZZ Other Alien	XXX		25,234				25,234	
58002.	XXX							
58003.	XXX							
58998. Summary of remaining write-ins for Line 58 from overflow page	XXX							
58999. Totals (Lines 58001 through 58003 plus 58998)(Line 58 above)	XXX		25,234				25,234	
9401. Non-pay settlement adjustments	XXX		68,979				68,979	
9402.	XXX							
9403.	XXX							
9498. Summary of remaining write-ins for Line 94 from overflow page	XXX							
9499. Totals (Lines 9401 through 9403 plus 9498)(Line 94 above)	XXX		68,979				68,979	

(a) Active Status Counts:

L - Licensed or Chartered - Licensed Insurance carrier or domiciled RRG..... 54  
 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..... 3

R - Registered - Non-domiciled RRGs.....  
 Q - Qualified - Qualified or accredited reinsurer.....

**SCHEDULE Y – INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP  
PART 1 – ORGANIZATIONAL CHART**



STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

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

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
			98-1089764				Global Atlantic Financial Group Limited	.BMJ	.NIA	The Global Atlantic Financial Group LLC	Ownership	100.000	The Global Atlantic Financial Group LLC		
			90-0928452				Global Atlantic Financial Company	.DE	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			38-3898658				Global Atlantic (Fin) Company	.DE	.NIA	Global Atlantic Financial Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1090868				Global Atlantic Financial Limited	.BMJ	.NIA	Global Atlantic Financial Group Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1090854				Global Atlantic Re Limited	.BMJ	.IA	Global Atlantic Financial Limited	Ownership	75.000	The Global Atlantic Financial Group LLC		
			98-1090854				Global Atlantic Re Limited	.BMJ	.IA	GA Re US HoldCo, LP	Ownership	25.000	The Global Atlantic Financial Group LLC		
			13-3896700				Global Atlantic Risk Advisors, L.P.	.DE	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			38-3898658				Global Atlantic Insurance Network, LLC	.DE	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			13-3896487				GA Risk Advisors, Inc.	.DE	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1529928				Global Atlantic Financial Company Bermuda Limited	.BMJ	.NIA	Global Atlantic Financial Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1089764	4520225			The Global Atlantic Financial Group LLC	.BMJ	.NIA	KKR Magnolia Holdings LLC	Ownership	61.000	KKR Group Partnership L.P.		
			98-1089764	4520225			The Global Atlantic Financial Group LLC	.BMJ	.NIA	Third Party Investors	Ownership	39.000	Third Party Investors		
			98-1563045				KKR Magnolia Holdings LLC	.CYM	.NIA	KKR Group Partnership L.P.	Ownership	100.000	KKR & Co. Inc.		
			98-0598047				KKR Group Partnership L.P.	.CYM	.NIA	KKR & Co. Inc.	Ownership	67.000	KKR & Co. Inc.		
3891	Global Atlantic Grp	69140	04-1867050	2578101	793699		First Allmerica Financial Life Insurance Company	.MA	.RE	Commonwealth Annuity and Life Insurance Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
3891	Global Atlantic Grp	84824	04-6145677	3958278	1391312		Commonwealth Annuity and Life Insurance Company	.MA	.IA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
3891	Global Atlantic Grp	62200	95-2496321				Accordia Life and Annuity Company	.IA	.IA	Commonwealth Annuity and Life Insurance Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			46-3694412				Gotham Issuer, LLC	.DE	.NIA	Global Atlantic (Fin) Company	Ownership	10.000	The Global Atlantic Financial Group LLC		
			46-3694412				Gotham Issuer, LLC	.DE	.NIA	Accordia Life and Annuity Company	Ownership	90.000	The Global Atlantic Financial Group LLC		
			95-2496321				DBE Solar Holdco LLC	.DE	.NIA	Accordia Life and Annuity Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
3891	Global Atlantic Grp	15333	46-3455515				Gotham Re, Inc.	.VT	.IA	Accordia Life and Annuity Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			95-2496321				Tapioca View, LLC	.DE	.NIA	Accordia Life and Annuity Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
3891	Global Atlantic Grp	15475	46-3465867				Cape Verity I, Inc.	.IA	.IA	Accordia Life and Annuity Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
3891	Global Atlantic Grp	15473	46-3485456				Cape Verity III, Inc.	.IA	.IA	Accordia Life and Annuity Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			35-1960899				Global Atlantic Investment Advisors, LLC	.IN	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			20-3944031				Global Atlantic Distributors, LLC	.DE	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			35-1815415				ForeLife Agency, Inc	.IN	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
3891	Global Atlantic Grp	91642	06-1016329		1554348		Forethought Life Insurance Company	.IN	.IA	Commonwealth Annuity and Life Insurance Company	Ownership	100.000	The Global Atlantic Financial Group LLC		

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

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
			81-3323212				Global Atlantic Equipment Management, LLC	DE	NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1452583				Global Atlantic Assurance Limited	BMU	NIA	Global Atlantic Financial Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1451597				GA Re Bermuda HoldCo Limited	BMU	NIA	Global Atlantic Financial Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			83-2239712				GA Re US HoldCo, LP	DE	NIA	Global Atlantic Financial Limited	Ownership	99.000	The Global Atlantic Financial Group LLC		
			83-2239712				GA Re US HoldCo, LP	DE	NIA	GA Re Bermuda HoldCo Limited	Ownership	1.000	The Global Atlantic Financial Group LLC		
			98-1090854				EXL Solar HoldCo, LLC	DE	NIA	Global Atlantic Re Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			04-6145677				Na Solar HoldCo, LLC	DE	NIA	Commonwealth Annuity and Life Insurance	Ownership	100.000	The Global Atlantic Financial Group LLC		

**NONE**

Asterisk	Explanation

## SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

	Response
1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement? .....	NO
2. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC with this statement? .....	NO
3. Will the Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC? .....	NO
4. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV be filed with the state of domicile and electronically with the NAIC? .....	NO
5. Will the Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI be filed with the state of domicile and electronically with the NAIC? .....	NO
6. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value) be filed with the state of domicile and electronically with the NAIC? .....	NO
7. Will the Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) be filed with the state of domicile and electronically with the NAIC? .....	YES
8. Will the Life PBR Statement of Exemption be filed with the state of domicile by July 1st and electronically with the NAIC with the second quarterly filing per the Valuation Manual (by August 15)? (2nd Quarter Only) The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter. ....	N/A

Explanation:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

Bar Code:

1. Trusteed Surplus Statement [Document Identifier 490]	
2. Medicare Part D Coverage Supplement [Document Identifier 365]	
3. Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 445]	
4. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXV [Document Identifier 446]	
5. Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI [Document Identifier 447]	
6. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI [Document Identifier 448]	

**OVERFLOW PAGE FOR WRITE-INS**

Additional Write-ins for Summary of Operations Line 8.3

	1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
08.304. Miscellaneous income .....	28,754	686,344	45,222
08.397. Summary of remaining write-ins for Line 8.3 from overflow page	28,754	686,344	45,222

Additional Write-ins for Summary of Operations Line 27

	1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
2704. Miscellaneous expense .....	748,274	700,288	(36,598,876)
2797. Summary of remaining write-ins for Line 27 from overflow page	748,274	700,288	(36,598,876)

**SCHEDULE A - VERIFICATION**

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year .....		
2. Cost of acquired:		
2.1 Actual cost at time of acquisition .....		
2.2 Additional investment made after acquisition .....		
3. Current year change in encumbrances .....		
4. Total gain (loss) on disposals .....		
5. Deduct amounts received on disposals .....		
6. Total foreign exchange change in book/adjusted carrying value .....		
7. Deduct current year's other than temporary impairment recognized .....		
8. Deduct current year's depreciation .....		
9. Book/adjusted carrying value at the end of current period (Lines 1+2+3+4-5+6-7-8) .....		
10. Deduct total nonadmitted amounts .....		
11. Statement value at end of current period (Line 9 minus Line 10)		

**NONE****SCHEDULE B - VERIFICATION**

Mortgage Loans

	1 Year to Date	2 Prior Year Ended December 31
1. Book value/recorded investment excluding accrued interest, December 31 of prior year .....	5,897,583	9,697,358
2. Cost of acquired:		
2.1 Actual cost at time of acquisition .....		
2.2 Additional investment made after acquisition .....		
3. Capitalized deferred interest and other .....		
4. Accrual of discount .....		925
5. Unrealized valuation increase (decrease) .....		
6. Total gain (loss) on disposals .....		37,712
7. Deduct amounts received on disposals .....	61,823	3,780,734
8. Deduct amortization of premium and mortgage interest points and commitment fees .....	8,351	57,678
9. Total foreign exchange change in book value/recorded investment excluding accrued interest .....		
10. Deduct current year's other than temporary impairment recognized .....		
11. Book value/recorded investment excluding accrued interest at end of current period (Lines 1+2+3+4+5+6-7-8+9-10) .....	5,827,409	5,897,583
12. Total valuation allowance .....		
13. Subtotal (Line 11 plus Line 12) .....	5,827,409	5,897,583
14. Deduct total nonadmitted amounts .....		
15. Statement value at end of current period (Line 13 minus Line 14)	5,827,409	5,897,583

**SCHEDULE BA - VERIFICATION**

Other Long-Term Invested Assets

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year .....	12,420,943	15,387,936
2. Cost of acquired:		
2.1 Actual cost at time of acquisition .....		
2.2 Additional investment made after acquisition .....		508,609
3. Capitalized deferred interest and other .....		
4. Accrual of discount .....		
5. Unrealized valuation increase (decrease) .....	(849,912)	(776,724)
6. Total gain (loss) on disposals .....	174,974	
7. Deduct amounts received on disposals .....	1,012,189	2,698,878
8. Deduct amortization of premium and depreciation .....		
9. Total foreign exchange change in book/adjusted carrying value .....		
10. Deduct current year's other than temporary impairment recognized .....		
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10) .....	10,733,816	12,420,943
12. Deduct total nonadmitted amounts .....		
13. Statement value at end of current period (Line 11 minus Line 12)	10,733,816	12,420,943

**SCHEDULE D - VERIFICATION**

Bonds and Stocks

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year .....	2,067,627,812	2,215,950,223
2. Cost of bonds and stocks acquired .....	28,140,727	154,610,591
3. Accrual of discount .....	1,866,583	19,120,563
4. Unrealized valuation increase (decrease) .....		
5. Total gain (loss) on disposals .....	576,445	22,352,884
6. Deduct consideration for bonds and stocks disposed of .....	48,543,222	336,805,577
7. Deduct amortization of premium .....	1,171,752	9,071,284
8. Total foreign exchange change in book/adjusted carrying value .....		
9. Deduct current year's other than temporary impairment recognized .....	42,064	
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees .....	100,237	1,470,412
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10) .....	2,048,554,766	2,067,627,812
12. Deduct total nonadmitted amounts .....		
13. Statement value at end of current period (Line 11 minus Line 12)	2,048,554,766	2,067,627,812

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE D - PART 1B**

Showing the Acquisitions, Dispositions and Non-Trading Activity  
During the Current Quarter for all Bonds and Preferred Stock by NAIC Designation

NAIC Designation	1 Book/Adjusted Carrying Value Beginning of Current Quarter	2 Acquisitions During Current Quarter	3 Dispositions During Current Quarter	4 Non-Trading Activity During Current Quarter	5 Book/Adjusted Carrying Value End of First Quarter	6 Book/Adjusted Carrying Value End of Second Quarter	7 Book/Adjusted Carrying Value End of Third Quarter	8 Book/Adjusted Carrying Value December 31 Prior Year
<b>BONDS</b>								
1. NAIC 1 (a) .....	1,029,573,336	8,789,335	28,677,074	(12,371,091)	997,314,506			1,029,573,336
2. NAIC 2 (a) .....	1,016,557,291	19,351,392	18,681,500	13,073,269	1,030,300,452			1,016,557,291
3. NAIC 3 (a) .....	21,497,185		507,965	(49,411)	20,939,809			21,497,185
4. NAIC 4 (a) .....								
5. NAIC 5 (a) .....								
6. NAIC 6 (a) .....								
7. Total Bonds	2,067,627,812	28,140,727	47,866,540	652,767	2,048,554,766			2,067,627,812
<b>PREFERRED STOCK</b>								
8. NAIC 1 .....								
9. NAIC 2 .....								
10. NAIC 3 .....								
11. NAIC 4 .....								
12. NAIC 5 .....								
13. NAIC 6 .....								
14. Total Preferred Stock								
15. Total Bonds and Preferred Stock	2,067,627,812	28,140,727	47,866,540	652,767	2,048,554,766			2,067,627,812

(a) Book/Adjusted Carrying Value column for the end of the current reporting period includes the following amount of short-term and cash equivalent bonds by NAIC designation:

NAIC 1 \$ ..... ; NAIC 2 \$ ..... ; NAIC 3 \$ ..... NAIC 4 \$ ..... ; NAIC 5 \$ ..... ; NAIC 6 \$ .....

S102

Schedule DA - Part 1 - Short-Term Investments

**N O N E**

Schedule DA - Verification - Short-Term Investments

**N O N E**

**SCHEDULE DB - PART A - VERIFICATION**

Options, Caps, Floors, Collars, Swaps and Forwards

1. Book/Adjusted Carrying Value, December 31, prior year (Line 10, prior year)	1,528,657
2. Cost Paid/(Consideration Received) on additions	320,966
3. Unrealized Valuation increase/(decrease)	(94,746)
4. SSAP No. 108 adjustments	
5. Total gain (loss) on termination recognized	119,447
6. Considerations received/(paid) on terminations	1,874,324
7. Amortization	
8. Adjustment to the Book/Adjusted Carrying Value of hedged item	
9. Total foreign exchange change in Book/Adjusted Carrying Value	
10. Book/Adjusted Carrying Value at End of Current Period (Lines 1+2+3+4+5-6+7+8+9)	
11. Deduct nonadmitted assets	
12. Statement value at end of current period (Line 10 minus Line 11)	

**SCHEDULE DB - PART B - VERIFICATION**

Futures Contracts

1. Book/Adjusted carrying value, December 31 of prior year (Line 6, prior year)	(227,995)
2. Cumulative cash change (Section 1, Broker Name/Net Cash Deposits Footnote - Cumulative Cash Change column)	
3.1 Add:	
Change in variation margin on open contracts - Highly Effective Hedges	
3.11 Section 1, Column 15, current year to date minus	5,820
3.12 Section 1, Column 15, prior year	(227,995)
3.12 Section 1, Column 15, prior year	233,815
Change in variation margin on open contracts - All Other	
3.13 Section 1, Column 18, current year to date minus	
3.14 Section 1, Column 18, prior year	233,815
3.2 Add:	
Change in adjustment to basis of hedged item	
3.21 Section 1, Column 17, current year to date minus	
3.22 Section 1, Column 17, prior year	
Change in amount recognized	
3.23 Section 1, Column 19, current year to date minus	
3.24 Section 1, Column 19, prior year plus	
3.25 SSAP No. 108 adjustments	
3.3 Subtotal (Line 3.1 minus Line 3.2)	233,815
4.1 Cumulative variation margin on terminated contracts during the year	(102,323)
4.2 Less:	
4.21 Amount used to adjust basis of hedged item	
4.22 Amount recognized	(102,323)
4.23 SSAP No. 108 adjustments	(102,323)
4.3 Subtotal (Line 4.1 minus Line 4.2)	
5. Dispositions gains (losses) on contracts terminated in prior year:	
5.1 Total gain (loss) recognized for terminations in prior year	
5.2 Total gain (loss) adjusted into the hedged item(s) for terminations in prior year	
6. Book/Adjusted carrying value at end of current period (Lines 1+2+3.3-4.3-5.1-5.2)	5,820
7. Deduct total nonadmitted amounts	
8. Statement value at end of current period (Line 6 minus Line 7)	5,820

Schedule DB - Part C - Section 1 - Replication (Synthetic Asset) Transactions (RSATs) Open

**N O N E**

Schedule DB-Part C-Section 2-Reconciliation of Replication (Synthetic Asset) Transactions Open

**N O N E**

## SCHEDULE DB - VERIFICATION

Verification of Book/Adjusted Carrying Value, Fair Value and Potential Exposure of all Open Derivative Contracts

		Book/Adjusted Carrying Value Check
1.	Part A, Section 1, Column 14.....	
2.	Part B, Section 1, Column 15 plus Part B, Section 1 Footnote - Total Ending Cash Balance.....	5,820
3.	Total (Line 1 plus Line 2).....	5,820
4.	Part D, Section 1, Column 6.....	5,820
5.	Part D, Section 1, Column 7.....	
6.	Total (Line 3 minus Line 4 minus Line 5).....	
		Fair Value Check
7.	Part A, Section 1, Column 16.....	
8.	Part B, Section 1, Column 13.....	5,820
9.	Total (Line 7 plus Line 8).....	5,820
10.	Part D, Section 1, Column 9.....	5,820
11.	Part D, Section 1, Column 10.....	
12.	Total (Line 9 minus Line 10 minus Line 11).....	
		Potential Exposure Check
13.	Part A, Section 1, Column 21.....	
14.	Part B, Section 1, Column 20.....	132,000
15.	Part D, Section 1, Column 12.....	132,000
16.	Total (Line 13 plus Line 14 minus Line 15).....	

**SCHEDULE E - PART 2 - VERIFICATION**

(Cash Equivalents)

	1	2
	Year To Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year .....	54,886,104	103,850,225
2. Cost of cash equivalents acquired .....	129,229,765	822,358,035
3. Accrual of discount .....		
4. Unrealized valuation increase (decrease) .....		
5. Total gain (loss) on disposals .....		(11,499)
6. Deduct consideration received on disposals .....	127,828,495	871,310,657
7. Deduct amortization of premium .....		
8. Total foreign exchange change in book/adjusted carrying value .....		
9. Deduct current year's other than temporary impairment recognized .....		
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9) .....	56,287,374	54,886,104
11. Deduct total nonadmitted amounts .....		
12. Statement value at end of current period (Line 10 minus Line 11)	56,287,374	54,886,104

Schedule A - Part 2 - Real Estate Acquired and Additions Made

**N O N E**

Schedule A - Part 3 - Real Estate Disposed

**N O N E**

**SCHEDULE B - PART 2**

Showing All Mortgage Loans ACQUIRED AND ADDITIONS MADE During the Current Quarter

1 Loan Number	2 Location		3 State	4 Loan Type	5 Date Acquired	6 Rate of Interest	7 Actual Cost at Time of Acquisition	8 Additional Investment Made After Acquisition	9 Value of Land and Buildings
	City								
<b>NONE</b>									
3399999 - Totals									

**SCHEDULE B - PART 3**

Showing All Mortgage Loans DISPOSED, Transferred or Repaid During the Current Quarter

1 Loan Number	2 Location		4 Loan Type	5 Date Acquired	6 Disposal Date	7 Book Value/Recorded Investment Excluding Accrued Interest Prior Year	8 Change in Book Value/Recorded Investment					13 Total Foreign Exchange Change in Book Value	14 Book Value/Recorded Investment Excluding Accrued Interest on Disposal	15 Consid-eration	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal
	City	State					8 Unrealized Valuation Increase (Decrease)	9 Current Year's (Amortization) /Accretion	10 Current Year's Other-Than-Temporary Impairment Recognized	11 Capitalized Deferred Interest and Other	12 Total Change in Book Value (8+9-10+11)						
805153525	Chicago	IL		07/31/2015		22,179		(2,801)			(2,801)		19,378		19,378		
805153541	CARMEL	IN		07/31/2015		42,832		(388)			(388)		42,445		42,445		
0299999. Mortgages with partial repayments						65,011		(3,188)			(3,188)		61,823		61,823		
0599999 - Totals																	

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE BA - PART 2**

Showing Other Long-Term Invested Assets ACQUIRED AND ADDITIONS MADE During the Current Quarter

1 CUSIP Identification	2 Name or Description	3 Location		5 Name of Vendor or Partner	6 NAIC Designation, NAIC Designation Modifier and SVO Admini- strative	7 Date Originally Acquired	8 Type and Strategy	9 Actual Cost at Time of Acquisition	10 Additional Investment Made After Acquisition	11 Amount of Encumbrances	12 Commitment for Additional Investment	13 Percentage of Ownership
		City	State									
<b>NONE</b>												
5099999 - Totals												XXX

**SCHEDULE BA - PART 3**

Showing Other Long-Term Invested Assets DISPOSED, Transferred or Repaid During the Current Quarter

1 CUSIP Identification	2 Name or Description	3 Location		5 Name of Purchaser or Nature of Disposal	6 Date Originally Acquired	7 Disposal Date	8 Book/ Adjusted Carrying Value Less Encum- brances, Prior Year	9 Change in Book/Adjusted Carrying Value						15 Book/ Adjusted Carrying Value Less Encum- brances on Disposal	16 Consid- eration	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Invest- ment Income
		City	State					9 Unrealized Valuation Increase (De- crease)	10 Current Year's (Depre- ciation) or (Amorti- zation)/ Accretion	11 Current Year's Other Than Temporary Impair- ment Recogn- ized	12 Capital- ized Deferred Interest and Other	13 Total Change in Book/ Adjusted Carrying Value (9+10- 11+12)	14 Total Foreign Exchange Change in Book/ Adjusted Carrying Value						
BGA03Y-56-5	MTP ENERGY OPPORTUNITIES FUND		DE	Various	05/26/2015	02/10/2021	814,972							814,972	989,946		174,974	174,974	61,274
1999999. Joint Venture Interests - Common Stock - Unaffiliated								814,972						814,972	989,946		174,974	174,974	61,274
000000-00-0	RABBI TRUST			Various	05/01/2014	03/31/2021	22,243							22,243	22,243				
4799999. Any Other Class of Assets - Affiliated								22,243						22,243	22,243				
4899999. Total - Unaffiliated								814,972						814,972	989,946		174,974	174,974	61,274
4999999. Total - Affiliated								22,243						22,243	22,243				
5099999 - Totals								837,215						837,215	1,012,189		174,974	174,974	61,274

E03

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE D - PART 3**

Show All Long-Term Bonds and Stock Acquired During the Current Quarter

1 CUSIP Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Number of Shares of Stock	7 Actual Cost	8 Par Value	9 Paid for Accrued Interest and Dividends	10 NAIC Designation, NAIC Designation Modifier and SVO Admini- strative Symbol
12503M-AC-2	CBOE GLOBAL MARKETS INC		.02/19/2021	GOLDMAN		4,901,650	5,000,000	15,122	1.G FE
205887-CD-2	CONAGRA BRANDS INC		.01/08/2021	MORGAN STANLEY		4,519,292	3,435,000	35,905	2.C FE
29268B-AC-5	ENEL FINANCE INTERNATIONAL NV	C	.02/02/2021	BARCLAY INVESTMENTS, INC.		14,832,100	10,000,000	262,556	2.A FE
466306-AA-5	JPALT 2008-R2 - CMO/RMBS		.01/25/2021	Direct		8,201	8,201		1.D FM
74922T-AA-4	RALI 2007-QH4 A1 - RMBS		.01/01/2021	Direct		3,879,484	4,837,493	91	1.D FM
3899999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)						28,140,727	23,280,694	313,673	XXX
8399997. Total - Bonds - Part 3						28,140,727	23,280,694	313,673	XXX
8399998. Total - Bonds - Part 5						XXX	XXX	XXX	XXX
8399999. Total - Bonds						28,140,727	23,280,694	313,673	XXX
8999997. Total - Preferred Stocks - Part 3							XXX		XXX
8999998. Total - Preferred Stocks - Part 5						XXX	XXX	XXX	XXX
8999999. Total - Preferred Stocks							XXX		XXX
9799997. Total - Common Stocks - Part 3							XXX		XXX
9799998. Total - Common Stocks - Part 5						XXX	XXX	XXX	XXX
9799999. Total - Common Stocks							XXX		XXX
9899999. Total - Preferred and Common Stocks							XXX		XXX
9999999 - Totals						28,140,727	XXX	313,673	XXX

E04

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE D - PART 4**

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11 + 12 - 13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol
36203N-6W-3	GN 354685 - RMBS		03/01/2021	Paydown		647	647	682	658		(11)		(11)		647				8	11/15/2023	1.A
0599999	Subtotal - Bonds - U.S. Governments					647	647	682	658		(11)		(11)		647				8	XXX	XXX
008684-AA-0	AHMA 2006-6 A1A - CMO/RMBS		03/25/2021	Paydown		349,227	467,263	335,565	375,349	(26,122)			(26,122)		349,227				210	12/25/2046	1.D FM
020002-AQ-4	ALLSTATE CORP		03/19/2021	J P MORGAN SECURITIES		1,911,135	1,500,000	1,615,839	1,584,935	(1,050)			(1,050)		1,583,886		327,249	327,249	24,075	06/01/2033	1.G FE
02660X-AD-6	AHMA 2006-2 2A1 - RMBS		03/25/2021	Paydown		65,136	72,491	54,913	59,465				5,671		65,136				54	09/25/2046	1.D FM
07387U-FW-6	BSABS 2006-1M1 A3 - RMBS		03/25/2021	Paydown		487,803	449,952	455,574	456,826				30,977		487,803				565	04/25/2036	1.D FM
07401M-AG-6	BSMF 2007-AR1 2A3 - RMBS		03/25/2021	Paydown		105,783	91,235	84,082	105,142				641		105,783				83	02/25/2037	1.D FM
07401N-AA-7	BSMF 2006-AR5 1A1 - RMBS		03/25/2021	Paydown		182,407	182,407	159,271	159,359				23,048		182,407				69	12/26/2036	1.D FM
07401T-AA-4	BSMF 2007-AR2 A1 - RMBS		03/25/2021	Paydown		131,249	131,249	92,280	86,976				44,273		131,249				52	03/25/2037	1.D FM
07401Y-AA-3	BSMF 2007-AR4 1A1 - RMBS		03/25/2021	Paydown		109,149	109,149	91,837	92,358				16,792		109,149				52	04/27/2037	1.D FM
12503M-AC-2	CBCE GLOBAL MARKETS INC		03/19/2021	J P MORGAN SECURITIES		4,643,650	5,000,000	4,901,650					642		4,902,292		(258,642)	(258,642)	21,215	12/15/2030	1.G FE
12566Q-AG-8	CWALT 2007-A1 1A7 - CMO/RMBS		03/01/2021	Paydown		51,264	53,892	46,370	49,632				1,632		51,264				573	01/25/2037	3.B FM
12566X-AK-4	CWALT 2007-A7 2A1 - CMO/RMBS		03/25/2021	Paydown		17,979	20,331	16,522	18,119				(140)		17,979				14	07/25/2037	3.B FM
12667G-LB-4	CWALT 2005-27 1A2 - CMO/RMBS		03/01/2021	Paydown		39,982	39,982	20,470	23,101				16,881		39,982				246	08/25/2035	1.D FM
12667G-MF-7	CWALT 2005-16 A4 - CMO/RMBS		03/25/2021	Paydown		28,951	28,951	14,430	17,471				11,480		28,951				179	06/25/2035	1.D FM
12667G-NS-8	CWALT 2005-24 1A1 - CMO/RMBS		03/01/2021	Paydown		57,909	57,918	40,319	39,381				18,529		57,909				202	07/20/2035	1.D FM
12667G-Y9-8	CWALT 2005-38 A1 - CMO/RMBS		03/01/2021	Paydown		67,356	67,356	54,472	55,046				12,310		67,356				138	09/25/2035	1.D FM
12667G-Z3-0	CWALT 2005-38 A3 - CMO/RMBS		03/25/2021	Paydown		116,751	116,751	90,582	92,657				24,094		116,751				316	11/20/2035	1.D FM
12668A-EV-3	CWALT 2005-59 1A1 - CMO/RMBS		03/22/2021	Paydown		266,956	266,956	195,954	205,319				61,636		266,956				138	11/20/2035	1.D FM
12668A-GN-9	CWALT 2005-56 1A1 - CMO/RMBS		03/25/2021	Paydown		56,732	56,732	27,489	29,444				27,288		56,732				203	11/25/2035	1.D FM
12668A-TN-5	CWALT 2005-62 1A1 - CMO/RMBS		03/25/2021	Paydown		189,571	189,571	142,624	139,891				49,679		189,571				148	12/25/2035	1.D FM
126694-D7-0	CWHL 2006-HYB2 4A1 - CMO/RMBS		03/01/2021	Paydown		13,396	7,339	6,056	12,663				734		13,396				3	04/22/2036	1.D FM
17312V-AD-0	CWLT 2007-6 12A - CMO/RMBS		03/01/2021	Paydown		138,426	137,852	55,136	49,833				88,593		138,426				596	03/25/2037	1.D FM
17312V-AE-8	CWLT 2007-6 13A - CMO/RMBS		03/01/2021	Paydown		11,170	13,563	4,693	6,156				5,014		11,170				59	03/25/2037	1.D FM
202740-HR-3	COMMONWEALTH BANK OF AUSTRALIA	C	03/05/2021	Direct		8,619,300	7,500,000	7,414,980	7,453,152				1,709		7,454,861		1,164,439	1,164,439	86,250	12/09/2025	2.A FE
23242G-AE-4	CWALT 2006-0A16 A2 - RMBS		03/25/2021	Paydown		6,110	6,110	3,995	4,373				1,737		6,110				3	10/25/2046	1.D FM
23245Q-AA-7	CWALT 2006-0A21 A1 - CMO/RMBS		03/22/2021	Paydown		107,311	107,311	67,181	71,351				35,960		107,311				55	03/20/2047	1.D FM
23332U-GH-0	DSL A 2006-AR1 21A - RMBS		03/01/2021	Paydown		134,691	134,691	115,238	117,313				17,378		134,691				382	04/19/2046	1.D FM
32029G-AC-8	FFML 2007-FF2 A2B - RMBS		03/25/2021	Paydown		386,844	386,844	220,294	208,404				178,439		386,844				148	03/25/2037	1.D FM
35177P-AL-1	ORANGE SA	C	03/19/2021	J P MORGAN SECURITIES		1,540,690	1,000,000	1,416,239	1,306,787				(4,899)		1,301,887		238,803	238,803	49,500	03/01/2031	2.A FE
3622EB-AE-5	GSAA 2006-15 AF5 - RMBS		03/01/2021	Paydown		83,323	83,323	36,818	30,735				52,587		83,323				248	09/25/2036	1.D FM
3622EB-AF-2	GSAA 2006-15 AF6 - RMBS		03/01/2021	Paydown		107,072	107,072	47,043	39,287				67,784		107,072				318	09/25/2036	1.D FM
3622EQ-AC-9	GSAA 2007-1 2A1 - RMBS		03/25/2021	Paydown		246,310	246,310	196,737	183,931				62,380		246,310				83	02/25/2037	1.D FM
39538H-EA-2	GPWF 2005-AR5 1A1 - CMO/RMBS		03/25/2021	Paydown		190,707	190,707	163,921	166,753				23,954		190,707				211	11/25/2045	1.D FM
39538H-HF-8	GPWF 2006-AR3 4A1 - RMBS		03/25/2021	Paydown		153,395	153,395	113,150	117,087				36,309		153,395				162	04/25/2036	1.D FM
406216-AS-0	HALLIBURTON CO		03/09/2021	JPM/INTL FCSTONE FINANCIAL INC		5,819,900	5,000,000	6,965,150	6,954,730				120		6,954,850		(1,134,950)	(1,134,950)	217,444	08/15/2096	2.A FE
41161P-L4-3	HVMT 2006-4 21A - CMO/RMBS		03/19/2021	Paydown		32,994	32,870	14,738	14,625				18,369		32,994				22	05/19/2046	1.D FM
41161P-WC-3	HVMT 2005-13 2A2 - CMO/RMBS		03/19/2021	Paydown		24,373	24,373	19,606	18,087				6,286		24,373				65	02/19/2036	1.D FM
41161Q-AB-7	HVMT 2006-3 2A - CMO/RMBS		03/01/2021	Paydown		31,751	31,751	16,016	14,820				16,931		31,751				99	06/19/2036	1.D FM
41162C-AC-5	HVMT 2006-10 21A - RMBS		03/19/2021	Paydown		612,248	612,248	508,599	530,675				81,573		612,248				341	11/19/2036	1.D FM
411640-AA-3	HVMT 2007-7 1AA - RMBS		03/25/2021	Paydown		1,269,694	1,123,637	1,037,969	1,045,517				224,177		1,269,694				2	10/25/2037	1.D FM
456612-AA-8	INDX 2006-AR6 A1A - RMBS		03/01/2021	Paydown		191,484	200,477	183,812	193,039				(1,555)		191,484				469	06/25/2046	3.B FM
45661E-AA-2	INDX 2006-AR2 A1A - RMBS		03/25/2021	Paydown		130,915	130,915	104,749	107,638				23,277		130,915				106	04/25/2046	1.D FM
45661E-AV-6	INDX 2006-AR4 A1A - RMBS		03/25/2021	Paydown		131,866	131,866	109,566	114,458				17,408		131,866				103	05/25/2046	1.D FM
45661E-DE-1	INDX 2006-AR7 5A1 - CMO/RMBS		03/01/2021	Paydown		15,584	3,010	2,950	15,551				33		15,584				3	05/25/2036	1.D FM
45661K-AA-8	INDX 2006-AR11 1A1 - CMO/RMBS		03/01/2021	Paydown		24,806	9,540	9,076	24,749				57		24,806				3	06/25/2036	3.B FM
466302-AG-1	JPALT 2006-S4 A4 - RMBS		03/01/2021	Paydown		755,177	746,369	439,876	556,579				198,598		755,177				8,548	12/25/2036	1.D FM
466306-AA-5	JPALT 2008-R2 - CMO/RMBS		03/25/2021	Paydown		152,939	153,207	96,287	88,812				64,126		152,939				1,694	06/25/2038	1.D FM
52522D-AL-5	LXS 2006-16N A31 - RMBS		03/25/2021	Paydown		215,595	215,595	185,397	197,308				97		215,595				134	11/25/2046	1.D FM
52522D-AM-3	LXS 2006-16N A4A - RMBS		03/25/2021	Paydown		6,276	6,276	4,998	5,280				97		6,276				4	11/25/2046	1.D FM
52524G-AA-0	LXS 2007-7N A1A - RMBS		03/25/2021	Paydown		119,072	119,068	96,058	105,328				13,744		119,072				53	06/25/2047	1.D FM

E05

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE D - PART 4**

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21	22	
										11	12	13	14	15								
CUSIP Identification	Description	Foreign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/(Decrease)	Current Year's (Amortization)/Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in Book/Adjusted Carrying Value (11 + 12 - 13)	Total Foreign Exchange Change in Book/Adjusted Carrying Value	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol	
550279-BA-0	LUM 2006-2 A1A - CMO/RMBS		03/25/2021	Paydown		181,828	181,799	120,219	127,582		54,246		54,246		181,828				140	02/25/2046	1.D FI	
55275T-AE-8	MABS 2007-WMC1 A5 - RMBS		03/25/2021	Paydown		15,087	15,088	1,476	1,538		13,550		13,550		15,087				31	01/25/2037	1.D FI	
56585A-AD-4	MARATHON PETROLEUM CORP		03/01/2021	Maturity @ 100.00		1,000,000	1,000,000	1,068,441	1,001,467		(1,467)		(1,467)		1,000,000				25,625	03/01/2021	2.B FE	
59025E-AT-3	MANA 2007-0AR4 A2 - RMBS		03/25/2021	Paydown		40,249	38,640	18,136	22,393		17,856		17,856		40,249				32	08/25/2037	1.D FI	
606822-AA-2	MITSUBISHI UFJ FINANCIAL GROUP INC	C	03/01/2021	Maturity @ 100.00		1,596,000	1,596,000	1,592,680	1,595,882		118		118		1,596,000				23,541	03/01/2021	1.G FE	
61751D-AG-9	MSM 2006-17XS A4 - RMBS		03/01/2021	Paydown		103,519	103,519	44,440	38,830		64,690		64,690		103,519				283	10/25/2046	1.D FI	
61752J-AA-8	MSM 2007-1XS 1A1 - RMBS		03/01/2021	Paydown		18,793	18,793	9,679	9,322		9,471		9,471		18,793				62	09/25/2046	1.D FI	
61756V-AC-3	MSM 2007-14AR 1A3 - CMO/RMBS		03/01/2021	Paydown		29	30	7	5		23		23		29					10/25/2037	1.D FI	
64829J-AN-3	NRZT 2017-1 B1 - CMO/RMBS		03/01/2021	Paydown		53,185	53,185	55,006	54,407		(1,222)		(1,222)		53,185				399	02/26/2057	1.D FI	
65535V-MY-1	NAA 2005-AR4 4A1 - RMBS		03/01/2021	Paydown		1,060	1,060	653	648		412		412		1,060					08/25/2035	1.D FI	
65538D-AA-3	NAA 2006-AR4 A1A - RMBS		03/25/2021	Paydown		129,166	124,874	82,526	82,158		47,008		47,008		129,166				84	12/25/2036	1.D FI	
65538D-AE-5	NAA 2006-AR4 A4A - RMBS		03/25/2021	Paydown		149,202	144,265	96,579	96,378		52,824		52,824		149,202				126	12/25/2036	1.D FI	
68389X-BM-6	ORACLE CORP		03/23/2021	WELLS FARGO SECURITIES LLC		2,100,720	2,000,000	1,878,680	1,925,045		2,864		2,864		1,927,908		172,812	172,812	36,806	07/15/2026	2.A FE	
74340X-BE-0	PROLOGIS LP		03/08/2021	Various		2,249,300	2,000,000	2,158,680	2,085,681		(3,028)		(3,028)		2,082,853		66,727	66,727	126,178	11/01/2025	1.G FE	
74922T-AA-0	RALI 2007-QH1 A1 - RMBS		03/25/2021	Paydown		329,032	329,032	265,271	278,515		50,517		50,517		329,032				127	02/25/2037	1.D FI	
74922T-AA-4	RALI 2007-QH4 A1 - RMBS		02/01/2021	Paydown		3,880,199	4,837,493	3,813,349	3,880,199						3,880,199				91	05/26/2037	1.D FI	
74922T-AA-4	RALI 2007-QH4 A1 - RMBS		03/25/2021	Paydown		302,980	302,980	238,836	249,377		53,603		53,603		302,980				117	05/26/2037	1.D FI	
75115F-AD-2	RALI 2006-Q08 A3A - RMBS		03/25/2021	Paydown		1,690,725	1,656,663	1,179,134	1,365,097		325,628		325,628		1,690,725				1,104	10/25/2046	1.D FI	
75116C-AA-4	RALI 2007-QS6 A1 - CMO/RMBS		03/25/2021	Paydown		104,838	131,706	81,639	83,363		21,475		21,475		104,838				99	04/25/2037	1.D FI	
76111X-P6-4	RFMSI 2006-S3 A8 - CMO/RMBS		03/01/2021	Paydown		16,683	21,140	19,148	19,233		(2,550)		(2,550)		16,683				233	03/25/2036	3.B FI	
78443C-0M-4	SLMA 2006-A B - ABS		03/15/2021	Paydown		180,724	180,724	167,057	174,102		6,622		6,622		180,724				233	06/15/2039	1.B FE	
78443D-AD-4	SLMA 2007-A A4 - ABS		03/15/2021	Paydown		222,954	222,954	196,957	208,471		14,483		14,483		222,954				254	12/16/2041	1.B FE	
82481L-AB-5	SHIRE ACQUISITIONS INVESTMENTS IRELAND D	C	01/22/2021	Call @ 100.00		42,517	42,000	41,955	41,993		1		1		41,994		6	6	851	09/23/2021	2.B FE	
85554N-AJ-9	STARF 2007-3 2A1 - CMO/RMBS		03/01/2021	Paydown		205,750	193,285	184,886	204,507		1,244		1,244		205,750				335	06/25/2037	3.B FI	
86358E-RW-8	SAIL 2005-3 M2 - RMBS		03/25/2021	Paydown		249,621	249,621	225,954	248,419		1,202		1,202		249,621				335	04/25/2035	1.D FI	
86358R-RA-1	SASC 2002-14A 1A1 - CMO/RMBS		03/01/2021	Paydown		300	300	135	300		300		300		300				2	07/25/2032	1.D FI	
86361B-AJ-6	SARM 2006-7 4A1 - CMO/RMBS		03/01/2021	Paydown		100	100	26	24		(24)		(24)		100					08/25/2036	1.D FI	
86364D-AA-8	SARM 2007-7 1A1 - CMO/RMBS		03/25/2021	Paydown		268,236	268,236	210,203	212,208		56,029		56,029		268,236				178	08/25/2037	1.D FI	
885220-BR-3	TMST 2002-3 A3 - CMO/RMBS		03/01/2021	Paydown		4,061	4,061	3,745	3,842		219		219		4,061				14	09/25/2042	1.D FI	
885220-EC-3	TMST 2003-5 2A - CMO/RMBS		03/01/2021	Paydown		12,281	12,281	9,121	7,989		4,291		4,291		12,281				62	10/25/2043	1.D FI	
885220-GZ-0	TMST 2005-1 A1 - CMO/RMBS		03/01/2021	Paydown		3,181	3,181	1,016	1,016		3,181		3,181		3,181				12	04/25/2045	1.D FI	
88522U-AC-1	TMST 2008-1 2A1 - CMO/RMBS		03/01/2021	Paydown		193,059	208,019	161,869	191,376		1,683		1,683		193,059				12	04/25/2038	1.D FI	
92927B-AA-0	WAMU 2007-QA6 1A - CMO/RMBS		03/01/2021	Paydown		386,412	386,412	314,696	319,016		67,396		67,396		386,412				825	07/25/2047	1.D FI	
93364A-AB-8	WAMU 2007-QA3 2A - CMO/RMBS		03/01/2021	Paydown		139,027	140,002	114,000	120,041		18,986		18,986		139,027				265	04/25/2047	1.D FI	
933936-DH-3	WAMU 2002-AR14 A2 - CMO/RMBS		03/01/2021	Paydown		3,360	3,360	2,697	2,753		607		607		3,360				20	11/25/2032	1.D FI	
93934F-QP-0	WMALT 2006-AR3 A1A - CMO/RMBS		03/01/2021	Paydown		37,852	38,299	20,510	22,989		14,863		14,863		37,852				113	05/25/2046	1.D FI	
93935H-AF-4	WMALT 2006-7 A3 - RMBS		03/01/2021	Paydown		49,890	49,890	21,126	18,630		31,260		31,260		49,890				146	09/25/2036	1.D FI	
94985K-AA-5	WFALT 2007-PA6 A1 - CMO/RMBS		03/01/2021	Paydown		221,374	229,702	195,800	191,590		29,785		29,785		221,374				871	12/28/2037	1.D FI	
94988G-AQ-6	WFMLT 2012-RR2 3A2 - CMO/RMBS		03/29/2021	Paydown		836,855	902,365	594,172	692,750		144,105		144,105		836,855				394	03/27/2047	1.D FI	
8399999	Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)					47,172,460	45,208,962	43,287,075	38,923,509		2,670,619		2,670,619		46,495,778		576,445	576,445	637,211	XXX	XXX	
26362#-AA-1	DUBLIN ASSET HOLDINGS		03/15/2021	Direct		682,956	682,956	682,956	682,956						682,956				883	11/30/2067	1.F PL	
26362#-AB-9	DUBLIN ASSET HOLDINGS A2		03/15/2021	Direct		504,919	504,919	504,919	504,919						504,919				653	11/30/2067	1.F PL	
45673#-AA-7	INFINITY ASSET HOLDINGS LLC		02/15/2021	Direct		113,864	113,864	113,864	113,864						113,864				92	12/15/2067	1.F	
BGA00Z-AJ-5	INFINITY LD ASSET HOLDINGS LLC A7		02/15/2021	Direct		54,524	54,524	54,524	54,524						54,524				190	12/31/2067	1.F	
BGA00Z-AJ-5	INFINITY LD ASSET HOLDINGS LLC A7		03/15/2021	Direct		13,852	13,852	13,852	13,852						13,852				(42)	12/31/2067	1.F	
8299999	Subtotal - Bonds - Unaffiliated Bank Loans					1,370,115	1,370,115	1,370,115	1,370,115						1,370,115				1,776	XXX	XXX	
8399997	Total - Bonds - Part 4					48,543,222	46,579,724	44,657,871	40,294,281		2,670,609		2,670,609		47,866,540		576,445	576,445	638,995	XXX	XXX	
8399998	Total - Bonds - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
8399999	Total - Bonds					48,543,222	46,579,724	44,657,871	40,294,281		2,670,609		2,670,609		47,866,540		576,445	576,445	638,995	XXX	XXX	
8999997	Total - Preferred Stocks - Part 4					XXX	XXX	XXX	XXX						XXX				XXX	XXX	XXX	

E05.1

STATEMENT AS OF MARCH 31, 2021 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE D - PART 4**

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1 CUSIP Ident- ification	2 Description	3 For- eign	4 Disposal Date	5 Name of Purchaser	6 Number of Shares of Stock	7 Consid- eration	8 Par Value	9 Actual Cost	10 Prior Year Book/ Adjusted Carrying Value	Change In Book/Adjusted Carrying Value					16 Book/ Adjusted Carrying Value at Disposal Date	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Bond Interest/ Stock Dividends Received During Year	21 Stated Con- tractual Maturity Date	22 NAIC Desig- nation, NAIC Desig- nation Modifier and SVO Admini- strative Symbol	
										11 Unrealized Valuation Increase/ (Decrease)	12 Current Year's (Amor- tization)/ Accretion	13 Current Year's Other Than Temporary Impairment Recog- nized	14 Total Change in Book/ Adjusted Carrying Value (11 + 12 - 13)	15 Total Foreign Exchange Change in Book /Adjusted Carrying Value								
8999998. Total - Preferred Stocks - Part 5						XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	
8999999. Total - Preferred Stocks							XXX														XXX	XXX
9799997. Total - Common Stocks - Part 4							XXX														XXX	XXX
9799998. Total - Common Stocks - Part 5						XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
9799999. Total - Common Stocks							XXX														XXX	XXX
9899999. Total - Preferred and Common Stocks							XXX														XXX	XXX
9999999 - Totals						48,543,222	XXX	44,657,871	40,294,281		2,670,609		2,670,609		47,866,540		576,445	576,445	638,995		XXX	XXX



**SCHEDULE DB - PART B - SECTION 1**

Futures Contracts Open as of the Current Statement Date

1	2	3	4	5	6	7	8	9	10	11	12	13	14	Highly Effective Hedges			18	19	20	21	22	
														15	16	17						
Ticker Symbol	Number of Contracts	Notional Amount	Description	Description of Item(s) Hedged, Used for Income Generation or Replicated	Schedule/ Exhibit Identifier	Type(s) of Risk(s) (a)	Date of Maturity or Expiration	Exchange	Trade Date	Transaction Price	Reporting Date Price	Fair Value	Book/ Adjusted Carrying Value	Cumulative Variation Margin	Deferred Variation Margin	Change in Variation Margin Gain (Loss) Used to Adjust Basis of Hedged Item	Cumulative Variation Margin for All Other Hedges	Change in Variation Margin Gain (Loss) Recognized in Current Year	Potential Exposure	Hedge Effectiveness at Inception and at Quarter-end (b)	Value of One (1) Point	
ESM1	12	2,374,620	EMINI S&P JUN1				06/18/2021	Chicago Mercantile E		3,957,7000	3,967,4000	5,820	5,820	5,820					132,000		50	
1569999999. Subtotal - Long Futures - Other													5,820	5,820	5,820					132,000	XXX	XXX
1579999999. Subtotal - Long Futures													5,820	5,820	5,820					132,000	XXX	XXX
1649999999. Subtotal - Short Futures																					XXX	XXX
1679999999. Subtotal - SSAP No. 108 Adjustments																					XXX	XXX
1689999999. Subtotal - Hedging Effective Excluding Variable Annuity Guarantees Under SSAP No.108																					XXX	XXX
1699999999. Subtotal - Hedging Effective Variable Annuity Guarantees Under SSAP No.108																					XXX	XXX
1709999999. Subtotal - Hedging Other																					XXX	XXX
1719999999. Subtotal - Replication																					XXX	XXX
1729999999. Subtotal - Income Generation																					XXX	XXX
1739999999. Subtotal - Other																				132,000	XXX	XXX
1749999999. Subtotal - Adjustments for SSAP No. 108 Derivatives													5,820	5,820	5,820						XXX	XXX
1759999999 - Totals													5,820	5,820	5,820					132,000	XXX	XXX

**NONE**

Broker Name	Beginning Balance	Cumulative Cash Change	Ending Cash Balance
Total Net Cash Deposits			

(a)

Code	Description of Hedged Risk(s)

(b)

Code	Financial or Economic Impact of the Hedge at the End of the Reporting Period



Schedule DB - Part D-Section 2 - Collateral for Derivative Instruments Open - Pledged By

**N O N E**

Schedule DB - Part D-Section 2 - Collateral for Derivative Instruments Open - Pledged To

**N O N E**

Schedule DB - Part E - Derivatives Hedging Variable Annuity Guarantees

**N O N E**

Schedule DL - Part 1 - Reinvested Collateral Assets Owned

**N O N E**

Schedule DL - Part 2 - Reinvested Collateral Assets Owned

**N O N E**

**SCHEDULE E - PART 1 - CASH**

Month End Depository Balances

1 Depository	2 Code	3 Rate of Interest	4 Amount of Interest Received During Current Quarter	5 Amount of Interest Accrued at Current Statement Date	Book Balance at End of Each Month During Current Quarter			9 *
					6 First Month	7 Second Month	8 Third Month	
Bank of New York ..... New York, NY .....					34,172	617,547	489,294	.XXX.
UMB ..... Kansas City, MO .....					(673,914)	(753,079)	(934,246)	.XXX.
Citi ..... New York, NY .....					42,505,332	15,888,954	15,656,916	.XXX.
Wells Fargo ..... Lincoln, NR .....					(7,757,648)	(3,319,010)	(4,069,884)	.XXX.
US Bank ..... New York, NY .....					5,897	10,000		.XXX.
JPM ..... New York, NY .....					1,288,979	383,847	475,971	.XXX.
0199998. Deposits in ... depositories that do not exceed the allowable limit in any one depository (See instructions) - Open Depositories	XXX	XXX						XXX
0199999. Totals - Open Depositories	XXX	XXX			35,402,818	12,828,259	11,618,051	XXX
0299998. Deposits in ... depositories that do not exceed the allowable limit in any one depository (See instructions) - Suspended Depositories	XXX	XXX						XXX
0299999. Totals - Suspended Depositories	XXX	XXX						XXX
0399999. Total Cash on Deposit	XXX	XXX			35,402,818	12,828,259	11,618,051	XXX
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX				XXX
.....								
.....								
.....								
.....								
.....								
0599999. Total - Cash	XXX	XXX			35,402,818	12,828,259	11,618,051	XXX

