

**QUARTERLY STATEMENT**

**OF THE**

**First Allmerica Financial Life Insurance Company**

**TO THE**

**Insurance Department**

**OF THE**

**STATE OF**

**FOR THE QUARTER ENDED  
MARCH 31, 2022**

LIFE, ACCIDENT AND HEALTH

FRATERNAL BENEFIT SOCIETIES

**2022**



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

QUARTERLY STATEMENT

AS OF MARCH 31, 2022

OF THE CONDITION AND AFFAIRS OF THE

First Allmerica Financial Life Insurance Company

NAIC Group Code 3891 (Current) 3891 (Prior) NAIC Company Code 89148 Employer's ID Number 04-1887050

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 03/16/1844 Commenced Business 06/01/1845
Statutory Home Office 20 Guest Street Brighton, MA, US 02135
Main Administrative Office 20 Guest Street Brighton, MA, US 02135
Mail Address 20 Guest Street Brighton, MA, US 02135
Primary Location of Books and Records 20 Guest Street Brighton, MA, US 02135
Internet Website Address www.globalatlantic.com
Statutory Statement Contact Carrie Jo Thomas 515-393-3690

OFFICERS

President Manu Sareen SVP, Associate General Counsel, Sec. Kathryn Lauren Freund
Co-President & Chairman Robert Michael Arena Jr. Chief Financial Officer, Treasurer David Allen Jacoby

OTHER

Anup Agarwal, Chief Investment Officer; Padma Elmgar, Chief Technology Officer; Jane Spanier Grosso, SVP and Controller; Leah Marie Hoppe, Managing Director; Kevin Michael Kimmerling, SVP, Assoc. GC, Asst. Sec.; Victoria May Lau, Senior Vice President; Emily Anne LeMay, Managing Director; Juan Ignacio Mazzini, Managing Director; Paula Genevieve Nelson, Managing Director; Peggy Hlu Poon, Senior Vice President; Peter John Rugele, Chief Operations Officer; Andrew Mead Shainberg, Chief Compliance Officer; Eric David Todd, Managing Director; Jason Alexander Bickler, MD, Chief Distribution Officer; Susan Lorraine Flengo, Managing Director; Jonathan Hecht, Managing Director; Douglas Robert Jaworski, Senior Vice President; Lori Ann LaForge, Chief Marketing Officer; Kevin Francis Leavey, SVP, Illustration & Product Actuary; Justin David MacNeil, MD, Asst. Treasurer; Stephen John McIntyre, Managing Director; Daniel Patrick O'Shea, Chief Administrative Officer; Samuel Ramos, Chief Legal Officer, GC; Kelly June Rutherford, Managing Director; Philip William Sherrill, MD, Chief Strategy Officer; Edward Clive Wilson, Chief Risk Officer; Robert James Egan, SVP, Appointed Actuary; Risa Beth Gordon, SVP, Asso. GC, Asst. Sec.; Brian Michael Hendry, Chief Audit Executive; Jason Kao, Managing Director; Donna Marie Lasick, Senior Vice President; Hanben Kim Lee, Executive Vice President; Tonya Rachelle Maxwell, Senior Vice President; Barrie Ribet Moskovich, Managing Director; Sarah Marie Patterson, Managing Director; Jason Michael Roach, Managing Director; Lauren Taylor Scott, Senior Vice President; Gary Phillip Silber, Managing Director

DIRECTORS OR TRUSTEES

Robert Michael Arena Jr., Peter John Rugele; Hanben Kim Lee, Manu Sareen; Paula Genevieve Nelson, Eric David Todd

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: Manu Sareen, Kathryn Lauren Freund, David Jacoby
Manu Sareen, President; Kathryn Lauren Freund, SVP, Associate General Counsel, Secretary; David Allen Jacoby, Chief Financial Officer, Treasurer

Subscribed and sworn to before me this 18th day of April, 2022. 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, 2022 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 .....	2,260,880,194		2,260,880,194	2,258,857,468
2. Stocks:				
2.1 Preferred stocks .....				
2.2 Common stocks .....				
3. Mortgage loans on real estate:				
3.1 First liens .....	5,501,197		5,501,197	5,581,714
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 (\$ .....(5,007,757) ), cash equivalents (\$ .....67,513,368 ) and short-term investments (\$ ..... 113 ) .....	62,505,724		62,505,724	100,648,029
6. Contract loans (including \$ ..... premium notes) .....	40,640,443	7,148,434	33,492,009	37,217,176
7. Derivatives .....	29,045		29,045	36,243
8. Other invested assets .....	1,954,334		1,954,334	5,430,554
9. Receivables for securities .....	19,461,168		19,461,168	19,904
10. Securities lending reinvested collateral assets .....				
11. Aggregate write-ins for invested assets .....				
12. Subtotals, cash and invested assets (Lines 1 to 11) .....	2,390,972,104	7,148,434	2,383,823,670	2,407,791,088
13. Title plants less \$ ..... charged off (for Title insurers only) .....				
14. Investment income due and accrued .....	34,263,989		34,263,989	32,939,322
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection .....	806,000	213,789	592,211	463,264
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ ..... earned but unbilled premiums) .....	1,926,423		1,926,423	1,979,504
15.3 Accrued retrospective premiums (\$ ..... ) and contracts subject to redetermination (\$ ..... ) .....				
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers .....	36,470,070		36,470,070	41,799,030
16.2 Funds held by or deposited with reinsured companies .....	593,976,913		593,976,913	593,464,596
16.3 Other amounts receivable under reinsurance contracts .....	17,696,726	323,118	17,373,608	28,577,149
17. Amounts receivable relating to uninsured plans .....				
18.1 Current federal and foreign income tax recoverable and interest thereon .....	4,372,887		4,372,887	4,444,844
18.2 Net deferred tax asset .....				
19. Guaranty funds receivable or on deposit .....	40,583		40,583	40,583
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 .....	127,585	127,585		
25. Aggregate write-ins for other than invested assets .....	2,961,813		2,961,813	1,482,134
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25) .....	3,083,615,093	7,812,926	3,075,802,167	3,112,981,514
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts .....	136,284,979		136,284,979	149,630,413
28. Total (Lines 26 and 27) .....	3,219,900,072	7,812,926	3,212,087,146	3,262,611,927
<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 .....	1,635,340		1,635,340	110,059
2502. Pension annuity contract .....	1,326,473		1,326,473	1,372,075
2503. ....				
2598. Summary of remaining write-ins for Line 25 from overflow page .....				
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above) .....	2,961,813		2,961,813	1,482,134

**LIABILITIES, SURPLUS AND OTHER FUNDS**

	1 Current Statement Date	2 December 31 Prior Year
1. Aggregate reserve for life contracts \$ .....565,185,757 less \$ ..... included in Line 6.3 (including \$ .....18,366,014 Modco Reserve).....	565,185,757	575,519,159
2. Aggregate reserve for accident and health contracts (including \$ ..... Modco Reserve).....		
3. Liability for deposit-type contracts (including \$ ..... Modco Reserve).....	283,904,045	287,034,019
4. Contract claims:		
4.1 Life .....	19,332,576	20,576,098
4.2 Accident and health .....		
5. Policyholders' dividends/refunds to members \$ .....267,459 and coupons \$ ..... due and unpaid .....	267,459	268,487
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).....	56,251	114,355
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 .....	45,975	44,559
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 \$ .....6,343,504 assumed and \$ .....31,497,290 ceded .....	37,840,794	40,358,570
9.4 Interest Maintenance Reserve .....	40,615,688	41,392,876
10. Commissions to agents due or accrued-life and annuity contracts \$ ..... , accident and health \$ ..... and deposit-type contract funds \$ .....	101,833	32,701
11. Commissions and expense allowances payable on reinsurance assumed .....		
12. General expenses due or accrued .....	1,513,951	1,036,879
13. Transfers to Separate Accounts due or accrued (net) (including \$ .....(2,745,764) accrued for expense allowances recognized in reserves, net of reinsured allowances) .....	(2,751,120)	(2,870,992)
14. Taxes, licenses and fees due or accrued, excluding federal income taxes .....	217,709	573,332
15.1 Current federal and foreign income taxes, including \$ ..... on realized capital gains (losses) .....		
15.2 Net deferred tax liability .....	3,891,983	3,997,875
16. Unearned investment income .....	87	223
17. Amounts withheld or retained by reporting entity as agent or trustee .....	89,894	80,441
18. Amounts held for agents' account, including \$ ..... agents' credit balances .....		
19. Remittances and items not allocated .....	15,813,786	15,342,252
20. Net adjustment in assets and liabilities due to foreign exchange rates .....		
21. Liability for benefits for employees and agents if not included above .....	1,198,684	1,244,285
22. Borrowed money \$ ..... and interest thereon \$ .....		
23. Dividends to stockholders declared and unpaid .....		
24. Miscellaneous liabilities:		
24.01 Asset valuation reserve .....	13,791,104	14,251,008
24.02 Reinsurance in unauthorized and certified (\$ ..... ) companies .....		
24.03 Funds held under reinsurance treaties with unauthorized and certified (\$ ..... ) reinsurers .....	728,392,698	741,514,168
24.04 Payable to parent, subsidiaries and affiliates .....	1,908,765	2,508,941
24.05 Drafts outstanding .....		
24.06 Liability for amounts held under uninsured plans .....		
24.07 Funds held under coinsurance .....	1,234,693,575	1,232,838,309
24.08 Derivatives .....		
24.09 Payable for securities .....		1,828,043
24.10 Payable for securities lending .....		
24.11 Capital notes \$ ..... and interest thereon \$ .....		
25. Aggregate write-ins for liabilities .....	13,847,662	13,794,617
26. Total liabilities excluding Separate Accounts business (Lines 1 to 25) .....	2,959,959,155	2,991,480,205
27. From Separate Accounts Statement .....	136,284,979	149,630,412
28. Total liabilities (Lines 26 and 27) .....	3,096,244,134	3,141,110,617
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 .....	97,062,043	97,062,043
34. Aggregate write-ins for special surplus funds .....	2,250,000	2,250,000
35. Unassigned funds (surplus) .....	11,530,959	17,189,257
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) .....	110,843,002	116,501,300
38. Totals of Lines 29, 30 and 37 .....	115,843,012	121,501,310
39. Totals of Lines 28 and 38 (Page 2, Line 28, Col. 3) .....	3,212,087,146	3,262,611,927
<b>DETAILS OF WRITE-INS</b>		
2501. Funds withheld other liabilities .....	11,596,346	11,603,539
2502. Other liabilities .....	2,251,316	2,191,078
2503. ....		
2598. Summary of remaining write-ins for Line 25 from overflow page .....		
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above) .....	13,847,662	13,794,617
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	462,378	(291,709)	177,405,460
2. Considerations for supplementary contracts with life contingencies	141,546	26,000	282,104
3. Net investment income	25,484,738	20,909,863	97,453,277
4. Amortization of Interest Maintenance Reserve (IMR)	1,268,195	761,083	4,209,577
5. Separate Accounts net gain from operations excluding unrealized gains or losses			
6. Commissions and expense allowances on reinsurance ceded	4,105,957	4,131,056	9,323,855
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	4,481,288	4,601,155	17,649,512
8.2 Charges and fees for deposit-type contracts			
8.3 Aggregate write-ins for miscellaneous income	9,092,996	(1,453,610)	14,188,187
9. Totals (Lines 1 to 8.3)	45,037,098	28,683,838	320,511,972
10. Death benefits	5,060,589	6,757,680	10,203,228
11. Matured endowments (excluding guaranteed annual pure endowments)	500	218	1,784
12. Annuity benefits	6,522,370	5,784,280	23,141,215
13. Disability benefits and benefits under accident and health contracts	14,846	10,426	48,827
14. Coupons, guaranteed annual pure endowments and similar benefits			
15. Surrender benefits and withdrawals for life contracts	8,630,608	2,611,807	12,077,079
16. Group conversions			
17. Interest and adjustments on contract or deposit-type contract funds	(271,830)	(159,478)	(399,152)
18. Payments on supplementary contracts with life contingencies			
19. Increase in aggregate reserves for life and accident and health contracts	(10,333,402)	(5,118,969)	121,561,518
20. Totals (Lines 10 to 19)	9,623,681	9,885,964	166,634,499
21. Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only)	260,501	353,515	1,216,044
22. Commissions and expense allowances on reinsurance assumed	1,392,691	1,000,654	2,220,295
23. General insurance expenses and fraternal expenses	3,263,583	2,829,939	11,425,353
24. Insurance taxes, licenses and fees, excluding federal income taxes	820,342	1,035,467	2,764,188
25. Increase in loading on deferred and uncollected premiums	(76,872)	10,718	(159,585)
26. Net transfers to or (from) Separate Accounts net of reinsurance	202,408	(928,748)	(708,380)
27. Aggregate write-ins for deductions	32,784,651	23,317,546	130,014,344
28. Totals (Lines 20 to 27)	48,270,985	37,505,055	313,406,758
29. Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)	(3,233,887)	(8,821,217)	7,105,214
30. Dividends to policyholders and refunds to members	22,085	2,415	29,641
31. Net gain from operations after dividends to policyholders, refunds to members and before federal income taxes (Line 29 minus Line 30)	(3,255,972)	(8,823,632)	7,075,573
32. Federal and foreign income taxes incurred (excluding tax on capital gains)	(2,462,273)	6,697	(31,598)
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)	(793,699)	(8,830,329)	7,107,171
34. Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of \$ 571,318 (excluding taxes of \$ 172,977 transferred to the IMR)	(607,788)	559,558	(648,548)
35. Net income (Line 33 plus Line 34)	(1,401,487)	(8,270,771)	6,458,623
<b>CAPITAL AND SURPLUS ACCOUNT</b>			
36. Capital and surplus, December 31, prior year	121,501,310	115,558,251	115,558,251
37. Net income (Line 35)	(1,401,487)	(8,270,771)	6,458,623
38. Change in net unrealized capital gains (losses) less capital gains tax of \$ 261,509	(996,018)	(563,465)	624,571
39. Change in net unrealized foreign exchange capital gain (loss)			
40. Change in net deferred income tax	(155,616)	1,929,005	(3,059,412)
41. Change in nonadmitted assets	(2,826,284)	83,685	(1,333,037)
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	459,904	(2,025,991)	(1,950,644)
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			(355,915,618)
51.2 Transferred to capital (Stock Dividend)			
51.3 Transferred from capital			
51.4 Change in surplus as a result of reinsurance	(738,797)	(1,488,219)	5,202,957
52. Dividends to stockholders			
53. Aggregate write-ins for gains and losses in surplus			355,915,618
54. Net change in capital and surplus for the year (Lines 37 through 53)	(5,658,298)	(10,335,756)	5,943,059
55. Capital and surplus, as of statement date (Lines 36 + 54)	115,843,012	105,222,495	121,501,310
<b>DETAILS OF WRITE-INS</b>			
08.301. Mortality fee income	7,877,295	8,088,004	28,636,030
08.302. Funds withheld assumed net investment income	610,191	(9,599,051)	989,573
08.303. FWH assumed realized loss		28,683	(1,172,746)
08.398. Summary of remaining write-ins for Line 8.3 from overflow page	605,510	28,754	(14,264,670)
08.399. Totals (Lines 08.301 through 08.303 plus 08.398) (Line 8.3 above)	9,092,996	(1,453,610)	14,188,187
2701. Net change in deposit liabilities	14,711,128	16,085,786	56,781,988
2702. Funds withheld ceded net investment income	17,113,513	6,483,486	70,661,051
2703. Miscellaneous expense	960,010	748,274	2,571,305
2798. Summary of remaining write-ins for Line 27 from overflow page			
2799. Totals (Lines 2701 through 2703 plus 2798)(Line 27 above)	32,784,651	23,317,546	130,014,344
5301. Miscellaneous Surplus Adj			355,915,618
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)			355,915,618

**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 .....	579,746	2,943,503	14,617,443
2. Net investment income .....	21,948,238	18,812,027	85,877,162
3. Miscellaneous income .....	27,176,020	(3,047,349)	40,858,833
4. Total (Lines 1 to 3) .....	49,704,004	18,708,181	141,353,438
5. Benefit and loss related payments .....	18,389,422	11,058,577	49,399,027
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts .....	82,536	(1,173,588)	(1,287,695)
7. Commissions, expenses paid and aggregate write-ins for deductions .....	39,531,407	28,020,886	132,186,892
8. Dividends paid to policyholders .....	81,217	74,908	50,914
9. Federal and foreign income taxes paid (recovered) net of \$ ..... tax on capital gains (losses) .....	(1,789,935)		(24,678,776)
10. Total (Lines 5 through 9) .....	56,294,647	37,980,783	155,670,362
11. Net cash from operations (Line 4 minus Line 10) .....	(6,590,643)	(19,272,602)	(14,316,924)
<b>Cash from Investments</b>			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds .....	80,900,681	48,543,222	377,437,214
12.2 Stocks .....			1,940,832
12.3 Mortgage loans .....	65,234	61,823	252,346
12.4 Real estate .....			
12.5 Other invested assets .....	2,200,363	909,867	8,048,787
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments .....		1,199	1,199
12.7 Miscellaneous proceeds .....	7,198	2,495,812	3,295,130
12.8 Total investment proceeds (Lines 12.1 to 12.7) .....	83,173,476	52,011,923	390,975,508
13. Cost of investments acquired (long-term only):			
13.1 Bonds .....	79,883,177	28,140,727	324,411,432
13.2 Stocks .....			
13.3 Mortgage loans .....			
13.4 Real estate .....			
13.5 Other invested assets .....			209,177
13.6 Miscellaneous applications .....	21,269,307		(968,910)
13.7 Total investments acquired (Lines 13.1 to 13.6) .....	101,152,484	28,140,727	323,651,699
14. Net increase (or decrease) in contract loans and premium notes .....	(965,194)	(829,965)	(6,103,496)
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14) .....	(17,013,814)	24,701,161	73,427,305
<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 .....			
16.3 Borrowed funds .....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities .....	(3,129,974)	(3,638,080)	(8,164,929)
16.5 Dividends to stockholders .....			
16.6 Other cash provided (applied) .....	(11,407,874)	(5,757,158)	(22,169,528)
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6) .....	(14,537,848)	(9,395,238)	(30,334,457)
<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) .....	(38,142,305)	(3,966,679)	28,775,924
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year .....	100,648,029	71,872,104	71,872,105
19.2 End of period (Line 18 plus Line 19.1) .....	62,505,724	67,905,425	100,648,029

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

20.0001. Assumed premiums from reinsurance transactions .....			233,088,097
20.0002. Assumed accrued investment income to settle reinsurance transactions .....			(2,179,187)
20.0003. Bonds received to settle reinsurance transactions .....			(228,897,261)
20.0004. Preferred stocks received to settle reinsurance transactions .....			(2,011,649)
20.0005. Ceded premiums from reinsurance transactions .....			(69,968,351)
20.0006. Non cash ceded commissions .....			(2,850,000)
20.0007. FIH payable and deposit assets on reinsurance ceded .....			72,818,351

## 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 .....	15,791,558	15,234,609	50,162,527
3. Ordinary individual annuities .....	105,621	78,046	244,559
4. Credit life (group and individual) .....			
5. Group life insurance .....	1,014,075	858,040	3,044,322
6. Group annuities .....	41,665	93,888	675,164
7. A & H - group .....			
8. A & H - credit (group and individual) .....			
9. A & H - other .....	13,930	13,973	51,762
10. Aggregate of all other lines of business .....			
11. Subtotal (Lines 1 through 10) .....	16,966,849	16,278,556	54,178,334
12. Fraternal (Fraternal Benefit Societies Only) .....			
13. Subtotal (Lines 11 through 12) .....	16,966,849	16,278,556	54,178,334
14. Deposit-type contracts .....			
15. Total (Lines 13 and 14)	16,966,849	16,278,556	54,178,334
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 #	03/31/2022	12/31/2021
Net Income					
(1) State basis (Page 4, Line 35, Columns 1 & 3)	XXX	XXX	XXX	\$ (1,401,485)	\$ 6,458,623
(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	\$ (1,401,485)	\$ 6,458,623
Surplus					
(5) State basis (Page 3, Line 38, Columns 1 & 2)	XXX	XXX	XXX	\$ 115,843,012	\$ 121,501,310
(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	\$ 115,843,012	\$ 121,501,310

#### 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

E. Subcomponents and Calculation of Adjusted Surplus and Total Admitted Goodwill - None

**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 2022 was 78.13%.

(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	\$	\$	\$	\$	\$ 5,501,197	\$	\$ 5,501,197
(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	\$	\$	\$	\$	\$ 5,581,714	\$	\$ 5,581,714
(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 Statement of Statutory Accounting Principles (“SSAP”) 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 \$69,216 and \$42,064 as of March 31, 2022 and December 31, 2021, 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
..03330HAA5..	\$ 9,003,693	\$ 8,934,477	\$ 69,216	\$ 8,934,477	\$ 8,934,477	.....03/31/2022.....
<b>Total</b>			<b>\$ 69,216</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..... \$ (2,620,527)
    - 2. 12 months or longer..... (185,889)
  - b. The aggregate related fair value of securities with unrealized losses:
    - 1. Less than 12 months..... \$ 81,901,974
    - 2. 12 months or longer..... 1,122,760
- (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

**Notes to the Financial Statements**

**5. Investments (Continued)**

L. Restricted Assets

(1) Restricted assets (including pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted										
	Current Year						Current Year				
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
	Total General Account (G/A)	G/A Supporting Separate Account (S/A) Activity	Total S/A Restricted Assets	S/A Assets Supporting G/A Activity	Total (1 + 3)	Total From Prior Year	Increase / (Decrease) (5 - 6)	Total Nonadmitted Restricted	Total Admitted Restricted (5-8)	Gross (Admitted & Nonadmitted) Restricted to Total Assets, %	Admitted to Total Admitted Assets, %
a. Subject to contractual obligation for which liability is not shown	\$	\$	\$	\$	\$	\$	\$	\$	\$	%	%
b. Collateral held under security lending agreements											
c. Subject to repurchase agreements											
d. Subject to reverse repurchase agreements											
e. Subject to dollar repurchase agreements											
f. Subject to dollar reverse repurchase agreements											
g. Placed under option contracts											
h. Letter stock or securities restricted as to sale - excluding FHLB capital stock											
i. FHLB capital stock											
j. On deposit with states	11,928,688				11,928,688	11,949,257	(20,569)		11,928,688	0.370	0.371
k. On deposit with other regulatory bodies											
l. Pledged as collateral to FHLB (including assets backing funding agreements)											
m. Pledged as collateral not captured in other categories											
n. Other restricted assets											
<b>o. Total restricted assets</b>	<b>\$ 11,928,688</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$ 11,928,688</b>	<b>\$ 11,949,257</b>	<b>\$ (20,569)</b>	<b>\$</b>	<b>\$ 11,928,688</b>	<b>0.370 %</b>	<b>0.371 %</b>

(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) - None

(3) Detail of other restricted assets (contracts that share similar characteristics, such as reinsurance and derivatives, are reported in the aggregate) - Not Applicable

(4) Collateral received and reflected as assets within the reporting entity's financial statements - Not Applicable

M. Working Capital Finance Investments - Not Applicable

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

O. 5GI Securities - Not Applicable

P. Short Sales - Not Applicable

Q. Prepayment Penalty and Acceleration Fees

General Account   Separate Account

(1) Number of CUSIPs	5
(2) Aggregate amount of investment income	\$ 587,971

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

## Notes to the Financial Statements

### 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 has no investments in joint venture, partnerships or limited liability companies that exceeded 10% of total admitted assets as of March 31, 2022 and December 31, 2021, respectively.

#### 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 that would justify the carrying value of the investment. The Company did not have any impairments in joint ventures, partnerships, or limited liability companies as of March 31, 2022 and December 31, 2021, respectively.

### 7. Investment Income

The Company did not have due and accrued income over 90 days past due that was excluded from surplus as of March 31, 2022 and December 31, 2021, 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 \$29,045 and \$36,243 as of March 31, 2022 and December 31, 2021, 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 the Company 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.

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 61.5% of the outstanding ordinary shares of TGAFGL; the remaining investors, none of whom own more than 9.8%, own the remaining approximately 38.5% of the outstanding ordinary shares.

The Company owns market traded bonds of KKR; one with an NAIC rating of 1, a carrying value of \$5,038,538, and a market value of \$5,600,033; and another with an NAIC rating of 2, a carrying value of \$9,970,273, and a market value of \$8,934,744, as of March 31, 2022. 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, 2022 no transactions greater than 1/2 of 1% of net admitted assets had occurred.

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

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

As of March 31, 2022, the Company reported a receivable from parent, subsidiaries and affiliates of \$0 and a payable of \$1,908,765. As of December 31, 2021, the Company reported a receivable from parent, subsidiaries and affiliates of \$0 and a payable of \$2,508,941. Intercompany balances are settled on a monthly basis.

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

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 incurred expenses for this agreement of \$858,734 for the three months ended March 31, 2022 and \$8,841,084 for the year ended December 31, 2021.

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 \$858,734 and \$2,150,410 for the three months ended March 31, 2022 and the year ended December 31, 2021, respectively.

## Notes to the Financial Statements

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

The Company has agreements with affiliated parties to receive and pay certain fee income and expenses related to policyholder administration of \$234,794 and \$735,085 as of March 31, 2022 and December 31, 2021, respectively and had a net \$234,794 and \$240,822 receivable at March 31, 2022 and December 31, 2021, 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 \$1,198,684 and \$1,244,285 as of March 31, 2022 and December 31, 2021, respectively. There were no expenses recognized in association with this plan for the three months and year ended March 31, 2022 and December 31, 2021.

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. The allocated expense for the years ended March 31, 2022 and December 31, 2021 was \$109,686 and \$331,539, 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. As of March 31, 2022 and December 31, 2021, no dividends were paid.

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

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.

## Notes to the Financial Statements

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

I. Changes in Special Surplus Funds - Not Applicable

J. Unassigned Funds (Surplus)

Unassigned funds (surplus) was reset to zero as of June 30, 2021, due to a quasi-reorganization described in footnote 13L. The portion of unassigned funds represented or reduced by cumulative unrealized gains and losses are \$3,155,527 and \$4,151,546, at March 31, 2022 and December 31, 2021, respectively.

K. Company-Issued Surplus Debentures or Similar Obligations - Not Applicable

L. Impact of Any Restatement Due to Prior Quasi-Reorganizations

Effective July 30, 2021, the Massachusetts Division of Insurance approved the Company's request to reset gross paid and contributed surplus and unassigned funds under a quasi-reorganization pursuant to SSAP No. 72 with an effective date of June 30, 2021. The Company's unassigned funds (surplus) would be reduced to zero through the restatement of gross paid in and contributed surplus. The Company requested the reset following the February 1, 2021 change in control, in which a majority-owned indirect subsidiary of KKR & Co. acquired the Company's ultimate parent, The Global Atlantic Financial Group LLC.

	Change in Year Surplus	Change in Gross Paid-in and Contributed Surplus
SSAP No. 72 restatement under quasi-reorganization.....	\$..... 355,915,618	\$.....

M. Effective Date(s) of Quasi-Reorganizations in the Prior 10 Years - None

### 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, 2022 commitments to make additional investments to joint ventures, LLC's, and partnerships total \$4,334,820

(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 \$3.4 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.

## Notes to the Financial Statements

### 14. Liabilities, Contingencies and Assessments (Continued)

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.

### 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, 2022. 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. Transfer 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, 2022 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 31, 2022 and December 31, 2021.

- (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
<b>a. Assets at fair value</b>					
Derivative Assets	\$ 29,045	\$	\$	\$	\$ 29,045
Separate Accounts	136,284,979				136,284,979
<b>Total assets at fair value/NAV</b>	<b>\$ 136,314,024</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$ 136,314,024</b>
<b>b. Liabilities at fair value</b>					
Derivative Liabilities	\$	\$	\$	\$	\$
<b>Total liabilities at fair value</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>

- (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, 2022, the Company had 1 6 rated bond with a carrying value of \$495,975. As of December 31, 2021, the Company did not have any 6 rated bonds.

#### 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.

## Notes to the Financial Statements

### 20. Fair Value Measurements (Continued)

#### 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

#### 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	\$ 2,339,009,832	\$ 2,260,880,193	\$ 8,034,294	\$ 2,277,083,639	\$ 53,891,899	\$	\$
Mortgage Loans	5,671,558	5,501,197			5,671,558		
Other Invested Assets		1,954,334					1,954,334
Preferred Stock							
Short-Term Investments	113	113		113			
Cash and Equivalents	62,505,611	62,505,611	62,505,611				
Derivatives	29,045	29,045	29,045				
Total Assets	2,407,216,159	2,330,870,493	70,568,950	2,277,083,752	59,563,457		1,954,334
Derivative Liabilities							
Total Liabilities							

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

As of March 31, 2022, 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	\$ 1,832,711	%		1
BA Common Stock	121,623			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 value.

#### 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

Effective July 1, 2021, the Company entered into a coinsurance agreement with USAA Life Insurance Company whereby it assumed fixed annuity business. The total assumed reserves were \$209,326,019. Subsequently the Company entered into a retrocession agreement where reserves of \$62,797,806 were ceded to a third party.

Assets values of \$11,928,688 and \$11,949,257 as of March 31, 2022 and December 31, 2021, 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.

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, 2022 and December 31, 2021.

#### 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.

**Notes to the Financial Statements**

**21. Other Items (Continued)**

- (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, 2022.

	Actual Cost	Book/Adjusted Carrying Value (Excluding Interest)	Fair Value	Other-Than- Temporary Impairment Losses Recognized
a. Residential mortgage-backed securities	\$ 11,037,081	\$ 9,937,247	\$ 13,855,493	\$
b. Commercial mortgage-backed securities				
c. Collateralized debt obligations				
d. Structured securities				
e. Equity investment in SCAs				
f. Other assets				
g. Total	<u>\$ 11,037,081</u>	<u>\$ 9,937,247</u>	<u>\$ 13,855,493</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, 2022.

**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.

## Notes to the Financial Statements

- 28. **Health Care Receivables** - Not Applicable
- 29. **Participating Policies** - No Significant Changes
- 30. **Premium Deficiency Reserves** - Not Applicable
- 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 [ ] No [ X ]
- 3.3 If the response to 3.2 is yes, provide a brief description of those changes.
- 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 ]
- 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	2	3
Name of Entity	NAIC Company Code	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. .... 12/31/2019
- 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). .... 05/26/2021
- 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 [ ] No [ X ]
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.
- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? ..... Yes [ 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	2	3	4	5	6
Affiliate Name	Location (City, State)	FRB	OCC	FDIC	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 .....	Philadelphia, PA .....	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
KKR Alternative Investment Management Unlimited Company .....	Dublin, Ireland .....	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 .....	\$ 15,007,952	\$ 15,008,810
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) .....	\$ 15,007,952	\$ 15,008,810
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 [ X ] 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, NW 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 [ X ]
- 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 [ X ]
- 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 [ X ]

- 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 [ X ] 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 [ X ]

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 [ X ]

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 [ X ]

## 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 ..... \$ ..... 5,501,197
- 1.14 Total Mortgages in Good Standing ..... \$ ..... 5,501,197
- 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) ..... \$ ..... 5,501,197
- 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, 2022 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE T - PREMIUMS AND ANNUITY CONSIDERATIONS**

Current Year To Date - Allocated by States and Territories

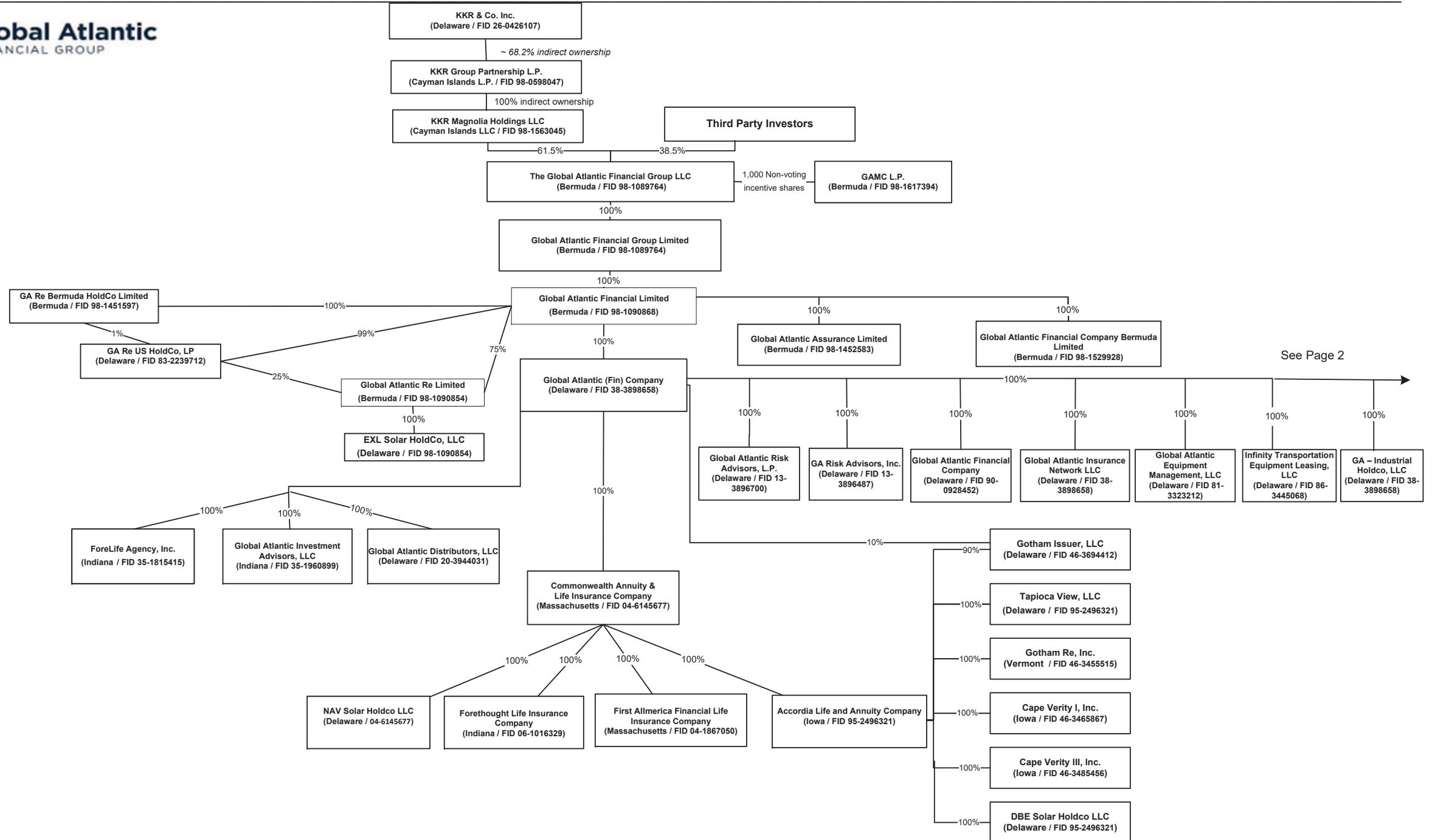
States, Etc.	1	Direct Business Only					7	
		Life Contracts		4	5	6		
		2	3					
Active Status (a)	Life Insurance Premiums	Annuity Considerations	Accident and Health Insurance Premiums, Including Policy, Membership and Other Fees	Other Considerations	Total Columns 2 Through 5	Deposit-Type Contracts		
1. Alabama	AL	L	18,292				18,292	
2. Alaska	AK	L	1,899				1,899	
3. Arizona	AZ	L	50,207		96		50,303	
4. Arkansas	AR	L	3,525				3,525	
5. California	CA	L	211,226				211,226	
6. Colorado	CO	L	158,597		87		158,684	
7. Connecticut	CT	L	118,714		682		119,396	
8. Delaware	DE	L	9,091				9,091	
9. District of Columbia	DC	L	3,767				3,767	
10. Florida	FL	L	739,663				739,663	
11. Georgia	GA	L	68,657		276		68,933	
12. Hawaii	HI	L	2,995				2,995	
13. Idaho	ID	L	4,311				4,311	
14. Illinois	IL	L	158,285		41		158,326	
15. Indiana	IN	L	54,553		386		54,939	
16. Iowa	IA	L	10,040				10,040	
17. Kansas	KS	L	4,059				4,059	
18. Kentucky	KY	L	16,230				16,230	
19. Louisiana	LA	L	91,636		221		91,857	
20. Maine	ME	L	63,612				63,612	
21. Maryland	MD	L	61,708				61,708	
22. Massachusetts	MA	L	157,921		25		157,946	
23. Michigan	MI	L	254,884	50,000			304,884	
24. Minnesota	MN	L	429,131		418		429,549	
25. Mississippi	MS	L	13,799				13,799	
26. Missouri	MO	L	13,318		111		13,429	
27. Montana	MT	L	2,140				2,140	
28. Nebraska	NE	L	14,322				14,322	
29. Nevada	NV	L	21,558				21,558	
30. New Hampshire	NH	L	40,833		37		40,870	
31. New Jersey	NJ	L	752,194				752,194	
32. New Mexico	NM	L	4,799				4,799	
33. New York	NY	L	7,755,064	56,521	11,226		7,822,811	
34. North Carolina	NC	L	125,717				125,717	
35. North Dakota	ND	L	393				393	
36. Ohio	OH	L	79,680		47		79,727	
37. Oklahoma	OK	L	2,581				2,581	
38. Oregon	OR	L	26,866				26,866	
39. Pennsylvania	PA	L	232,942	1,890			234,832	
40. Rhode Island	RI	L	16,678				16,678	
41. South Carolina	SC	L	92,343				92,343	
42. South Dakota	SD	L	2,741				2,741	
43. Tennessee	TN	L	62,186				62,186	
44. Texas	TX	L	113,553				113,553	
45. Utah	UT	L	8,984				8,984	
46. Vermont	VT	L	17,330				17,330	
47. Virginia	VA	L	120,320		33		120,353	
48. Washington	WA	L	23,159				23,159	
49. West Virginia	WV	L	3,040				3,040	
50. Wisconsin	WI	L	12,299		24		12,323	
51. Wyoming	WY	L	7,012				7,012	
52. American Samoa	AS	L						
53. Guam	GU	L						
54. Puerto Rico	PR	N	22,884	38,875	220		61,979	
55. U.S. Virgin Islands	VI	L	576				576	
56. Northern Mariana Islands	MP	N						
57. Canada	CAN	N	941				941	
58. Aggregate Other Aliens	OT	XXX	34,269				34,269	
59. Subtotal	XXX		12,317,524	147,286	13,930		12,478,740	
90. Reporting entity contributions for employee benefits plans	XXX							
91. Dividends or refunds applied to purchase paid-up additions and annuities	XXX		3,843,425				3,843,425	
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		109,837				109,837	
94. Aggregate or other amounts not allocable by State	XXX		671,414				671,414	
95. Totals (Direct Business)	XXX		16,942,200	147,286	13,930		17,103,416	
96. Plus Reinsurance Assumed	XXX		8,651,516	1,524,172	184		10,175,872	
97. Totals (All Business)	XXX		25,593,716	1,671,458	14,114		27,279,288	
98. Less Reinsurance Ceded	XXX		24,809,387	706,586	14,114		25,530,087	
99. Totals (All Business) less Reinsurance Ceded	XXX		784,329	964,872			1,749,201	
DETAILS OF WRITE-INS								
58001. ZZZ Other Alien	XXX		34,269				34,269	
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		34,269				34,269	
9401. Non-pay settlement adjustments	XXX		671,414				671,414	
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		671,414				671,414	

(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

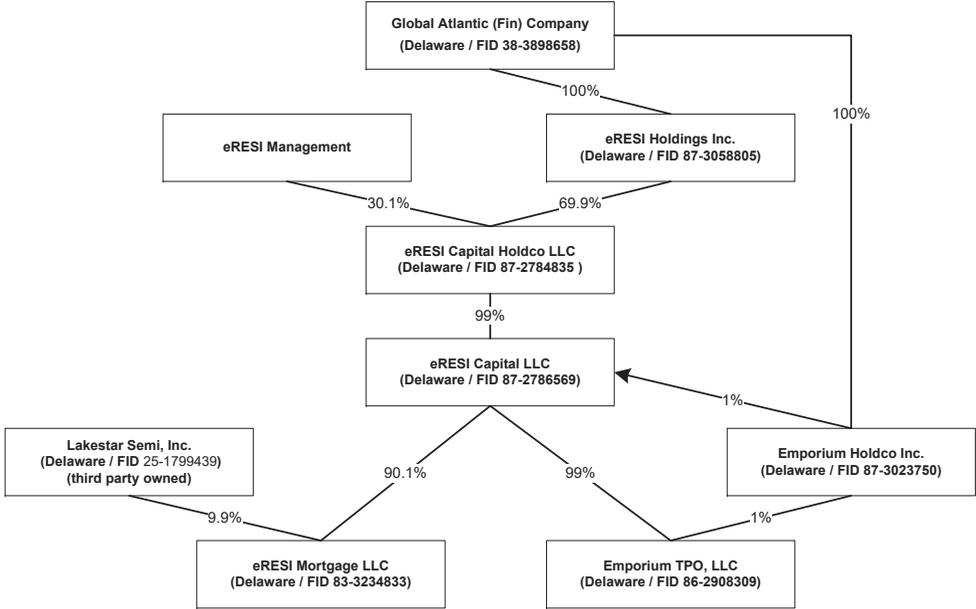
R - Registered - Non-domiciled RRGs.....  
 Q - Qualified - Qualified or accredited reinsurer.....

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



See Page 2

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



12.1

STATEMENT AS OF MARCH 31, 2022 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? (Yes/No)	*
			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	.NIA	Global Atlantic Financial Limited	Ownership	75.000	The Global Atlantic Financial Group LLC		
			98-1090854				Global Atlantic Re Limited	.BMJ	.NIA	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				GA Industrial Holdco LLC	.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	4520225			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	61.500	KKR Group Partnership L.P.		
			98-1089764	4520225			The Global Atlantic Financial Group LLC	.BMJ	.NIA	Third Party Investors	Ownership	38.500	Third Party Investors		
			98-1563045				KKR Magnolia Holdings LLC	.CYM	.NIA	KKR Group Partnership L.P.	Ownership	100.000	KKR & Co. Inc.		
3891	Global Atlantic Grp	69140	98-0598047	2578101	793699		KKR Group Partnership L.P.	.CYM	.NIA	KKR & Co, Inc.	Ownership	68.200	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		
3891	Global Atlantic Grp	15333	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		
3891	Global Atlantic Grp	15475	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		
3891	Global Atlantic Grp	91642	35-1815415		1554348		ForeLife Agency, Inc	.IN	.NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		

STATEMENT AS OF MARCH 31, 2022 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? (Yes/No)	*
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		
			81-3323212				Global Atlantic Equipment Management, LLC	DE	NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			86-3445068				Infinity Transportation Equipment Leasing, LLC	DE	NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1452583				Global Atlantic Assurance Limited	BMJ	NIA	Global Atlantic Financial Limited	Ownership	100.000	The Global Atlantic Financial Group LLC		
			98-1451597				GA Re Bermuda HoldCo Limited	BMJ	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				Nav Solar Holdco LLC	DE	NIA	Commonwealth Annuity and Life Insurance Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			87-3058805				eRESI Holdings Inc.	DE	NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			87-2784835				eRESI Capital Holdco LLC	DE	NIA	eRESI Holdings Inc.	Ownership	69.900	The Global Atlantic Financial Group LLC		
			87-2784835				eRESI Capital Holdco LLC	DE	NIA	eRESI Management	Ownership	30.100	The Global Atlantic Financial Group LLC		
			87-2786569				eRESI Capital LLC	DE	NIA	eRESI Capital Holdco LLC	Ownership	99.000	The Global Atlantic Financial Group LLC		
			87-2786569				eRESI Capital LLC	DE	NIA	Emporium Holdco Inc.	Ownership	1.000	The Global Atlantic Financial Group LLC		
			87-3023750				Emporium Holdco Inc.	DE	NIA	Global Atlantic (Fin) Company	Ownership	100.000	The Global Atlantic Financial Group LLC		
			83-3234833				eRESI Mortgage LLC	DE	NIA	eRESI Capital LLC	Ownership	90.100	The Global Atlantic Financial Group LLC		
			86-2908309				Emporium TPO, LLC	DE	NIA	eRESI Capital LLC	Ownership	99.000	The Global Atlantic Financial Group LLC		
			86-2908309				Emporium TPO, LLC	DE	NIA	Emporium Holdco Inc.	Ownership	1.000	The Global Atlantic Financial Group LLC		

**NONE**

Asterisk	Explanation

13.1

## 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

**AUGUST FILING**

9. Will the regulator-only (non-public) Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile and electronically with the NAIC (as a regulator-only non-public document) by August 1? 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 .....	445,793	28,754	800,077
08.305. Net assumed adjustment to IMR .....	159,717		(15,064,747)
08.397. Summary of remaining write-ins for Line 8.3 from overflow page	605,510	28,754	(14,264,670)

**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 .....	5,581,714	5,897,583
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 .....		
5. Unrealized valuation increase (decrease) .....		
6. Total gain (loss) on disposals .....		
7. Deduct amounts received on disposals .....	65,234	252,346
8. Deduct amortization of premium and mortgage interest points and commitment fees .....	15,283	63,523
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) .....	5,501,197	5,581,714
12. Total valuation allowance .....		
13. Subtotal (Line 11 plus Line 12) .....	5,501,197	5,581,714
14. Deduct total nonadmitted amounts .....		
15. Statement value at end of current period (Line 13 minus Line 14)	5,501,197	5,581,714

**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 .....	5,430,554	12,420,943
2. Cost of acquired:		
2.1 Actual cost at time of acquisition .....		85,857
2.2 Additional investment made after acquisition .....		123,320
3. Capitalized deferred interest and other .....		
4. Accrual of discount .....		
5. Unrealized valuation increase (decrease) .....	(1,239,387)	646,425
6. Total gain (loss) on disposals .....		
7. Deduct amounts received on disposals .....	2,236,833	7,845,991
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) .....	1,954,334	5,430,554
12. Deduct total nonadmitted amounts .....		
13. Statement value at end of current period (Line 11 minus Line 12)	1,954,334	5,430,554

**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 .....	2,258,857,468	2,067,627,812
2. Cost of bonds and stocks acquired .....	79,883,177	555,320,343
3. Accrual of discount .....	3,713,052	15,675,950
4. Unrealized valuation increase (decrease) .....	(10,942)	(22,289)
5. Total gain (loss) on disposals .....	893,406	4,244,732
6. Deduct consideration for bonds and stocks disposed of .....	80,900,681	379,378,046
7. Deduct amortization of premium .....	2,074,042	8,712,018
8. Total foreign exchange change in book/adjusted carrying value .....		
9. Deduct current year's other than temporary impairment recognized .....	69,216	42,064
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees .....	587,971	4,143,049
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10) .....	2,260,880,193	2,258,857,468
12. Deduct total nonadmitted amounts .....		
13. Statement value at end of current period (Line 11 minus Line 12)	2,260,880,193	2,258,857,468

STATEMENT AS OF MARCH 31, 2022 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) .....	1,196,699,936	37,604,382	79,096,372	(9,219,416)	1,145,988,530			1,196,699,936
2. NAIC 2 (a) .....	1,049,350,014	39,956,608	479,041	18,192,869	1,107,020,450			1,049,350,014
3. NAIC 3 (a) .....	12,512,193	1,805,266	212,737	(7,401,099)	6,703,623			12,512,193
4. NAIC 4 (a) .....	449,275	470,920	239,601	(8,867)	671,727			449,275
5. NAIC 5 (a) .....								
6. NAIC 6 (a) .....		501,000		(5,025)	495,975			
7. Total Bonds	2,259,011,418	80,338,176	80,027,751	1,558,462	2,260,880,305			2,259,011,418
<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	2,259,011,418	80,338,176	80,027,751	1,558,462	2,260,880,305			2,259,011,418

(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 \$ .....113 ; NAIC 2 \$ ..... ; NAIC 3 \$ ..... NAIC 4 \$ ..... ; NAIC 5 \$ ..... ; NAIC 6 \$ .....

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## SCHEDULE DA - PART 1

Short-Term Investments

	1	2	3	4	5
	Book/Adjusted Carrying Value	Par Value	Actual Cost	Interest Collected Year-to-Date	Paid for Accrued Interest Year-to-Date
7709999999 Totals	113	XXX	113	2	

## SCHEDULE DA - VERIFICATION

Short-Term Investments

	1	2
	Year To Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year .....	153,950	
2. Cost of short-term investments acquired .....	455,000	4,236,715
3. Accrual of discount .....		
4. Unrealized valuation increase (decrease) .....		
5. Total gain (loss) on disposals .....	(488)	1,683
6. Deduct consideration received on disposals .....	607,959	4,060,568
7. Deduct amortization of premium .....	390	23,881
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) .....	113	153,950
11. Deduct total nonadmitted amounts .....		
12. Statement value at end of current period (Line 10 minus Line 11)	113	153,950

**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)	.....	
2. Cost Paid/(Consideration Received) on additions	.....	
3. Unrealized Valuation increase/(decrease)	.....	
4. SSAP No. 108 adjustments	.....	
5. Total gain (loss) on termination recognized	.....	
6. Considerations received/(paid) on terminations	.....	
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)	.....	

**NONE**

**SCHEDULE DB - PART B - VERIFICATION**

Futures Contracts

1. Book/Adjusted carrying value, December 31 of prior year (Line 6, prior year)	.....	36,243
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	.....	29,045
3.12 Section 1, Column 15, prior year	.....	36,243 (7,198)
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	.....	(7,198)
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)	.....	(7,198)
4.1 Cumulative variation margin on terminated contracts during the year	.....	(36,470)
4.2 Less:		
4.21 Amount used to adjust basis of hedged item	.....	
4.22 Amount recognized	.....	(36,470)
4.23 SSAP No. 108 adjustments	.....	(36,470)
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)	.....	29,045
7. Deduct total nonadmitted amounts	.....	
8. Statement value at end of current period (Line 6 minus Line 7)	.....	29,045

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.....	29,045
3.	Total (Line 1 plus Line 2).....	29,045
4.	Part D, Section 1, Column 6.....	29,045
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.....	29,045
9.	Total (Line 7 plus Line 8).....	29,045
10.	Part D, Section 1, Column 9.....	29,045
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.....	24,000
15.	Part D, Section 1, Column 12.....	24,000
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 .....	54,544,379	54,886,104
2. Cost of cash equivalents acquired .....	178,513,132	623,039,632
3. Accrual of discount .....		
4. Unrealized valuation increase (decrease) .....		
5. Total gain (loss) on disposals .....		
6. Deduct consideration received on disposals .....	165,544,143	623,381,284
7. Deduct amortization of premium .....		73
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) .....	67,513,368	54,544,379
11. Deduct total nonadmitted amounts .....		
12. Statement value at end of current period (Line 10 minus Line 11)	67,513,368	54,544,379

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		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
	3 City	3 State						
<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
	3 City	3 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		23,559		(2,685)			(2,685)		20,874		20,874		
805153541	CARMEL	IN		07/31/2015		44,497		(137)			(137)		44,359		44,359		
0299999. Mortgages with partial repayments						68,056		(2,822)			(2,822)		65,234		65,234		
0599999 - Totals						68,056		(2,822)			(2,822)		65,234		65,234		

STATEMENT AS OF MARCH 31, 2022 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 Counterparty	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	Capital Distribution	05/26/2015	02/25/2022	841,503							841,503	841,503			521,989	
BGA065-V0-1	GSO ENERGY SELECT OPPORTUNITIES		DE	Capital Distribution	10/28/2015	03/31/2022	1,233,030							1,233,030	1,233,030			863,757	
000000-00-0	RABBI TRUST				05/01/2014	03/31/2022	154,726	7,575						162,300	162,300				
1999999. Joint Venture Interests - Common Stock - Unaffiliated							2,229,259	7,575						2,236,833	2,236,833			1,385,746	
4899999. Total - Unaffiliated							2,229,259	7,575							2,236,833	2,236,833			1,385,746
4999999. Total - Affiliated																			
5099999 - Totals							2,229,259	7,575							2,236,833	2,236,833			1,385,746

STATEMENT AS OF MARCH 31, 2022 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	2	3	4	5	6	7	8	9	10
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol
91282C-EF-4	UNITED STATES TREASURY		.03/30/2022	Bank of America Merrill Lynch		2,004,531	2,000,000		1.A FE
0109999999	Subtotal - Bonds - U.S. Governments					2,004,531	2,000,000		XXX
037833-EJ-5	APPLE INC		.01/05/2022	Bank of America Merrill Lynch		7,694,560	8,000,000	57,422	1.B FE
05610H-AN-3	BX 22LP2 G - CMBS		.02/10/2022	CITIGROUP GLOBAL MARKETS, INC		9,758,090	9,800,000		2.B
06406R-AW-7	BANK OF NEW YORK MELLON CORP		.01/05/2022	Bank of America Merrill Lynch		3,936,224	4,085,000	32,680	1.E FE
172967-BL-4	CITIGROUP INC		.02/08/2022	CITIGROUP GLOBAL MARKETS, INC		3,184,937	2,515,410	25,460	2.B FE
442851-BH-3	THE HOWARD UNIVERSITY		.03/08/2022	J.P. MORGAN SECURITIES INC		5,000,000	5,000,000		2.C FE
62954H-AH-1	NXP BV	C.	.01/05/2022	Bank of America Merrill Lynch		7,833,466	7,925,000	21,585	2.B FE
89236T-JQ-9	TOYOTA MOTOR CREDIT CORP		.01/05/2022	Bank of America Merrill Lynch		11,976,087	12,433,000	74,805	1.E FE
92343V-CQ-5	VERIZON COMMUNICATIONS INC		.02/08/2022	JEFF GA		2,360,356	2,137,500	25,864	2.A FE
94973V-AH-0	ANTHEM INC		.02/08/2022	CITIGROUP GLOBAL MARKETS, INC		6,819,759	5,415,000	49,224	2.B FE
BGA10A-CQ-8	INFINITY ASSET HLD 2020 CLASS A - ABS		.01/03/2022	INFINITY		11,501,386	11,501,386		1.F PL
BGA10A-CQ-8	INFINITY ASSET HLD 2020 CLASS A - ABS		.03/01/2022	INFINITY		36,593	36,593		1.F PL
BGA10A-CR-6	INFINITY ASSET HLDS 2020 CLASS B - ABS		.01/03/2022	INFINITY		1,799,541	1,799,541		3.B PL
BGA10A-CR-6	INFINITY ASSET HLDS 2020 CLASS B - ABS		.03/01/2022	INFINITY		5,725	5,725		3.B PL
BGA10A-CS-4	INFINITY ASSET HLDS 2020 CLASS C - ABS		.01/03/2022	INFINITY		469,427	469,427		4.B PL
BGA10A-CS-4	INFINITY ASSET HLDS 2020 CLASS C - ABS		.03/01/2022	INFINITY		1,494	1,494		4.B PL
BGA10A-CT-2	INFINITY ASSET HLDS 2020 CLASS D - ABS		.01/03/2022	INFINITY		501,000	501,000		6.
1109999999	Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)					72,878,646	71,626,076	287,039	XXX
744320-BJ-0	PRUDENTIAL FINANCIAL INC		.02/23/2022	MORGAN STANLEY & CO. LLC		5,000,000	5,000,000		2.B FE
1309999999	Subtotal - Bonds - Hybrid Securities					5,000,000	5,000,000		XXX
2509999997	Total - Bonds - Part 3					79,883,177	78,626,076	287,039	XXX
2509999998	Total - Bonds - Part 5					XXX	XXX	XXX	XXX
2509999999	Total - Bonds					79,883,177	78,626,076	287,039	XXX
4509999997	Total - Preferred Stocks - Part 3						XXX		XXX
4509999998	Total - Preferred Stocks - Part 5					XXX	XXX	XXX	XXX
4509999999	Total - Preferred Stocks						XXX		XXX
5989999997	Total - Common Stocks - Part 3						XXX		XXX
5989999998	Total - Common Stocks - Part 5					XXX	XXX	XXX	XXX
5989999999	Total - Common Stocks						XXX		XXX
5999999999	Total - Preferred and Common Stocks						XXX		XXX
6009999999	Totals					79,883,177	XXX	287,039	XXX

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STATEMENT AS OF MARCH 31, 2022 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		03/01/2022	Paydown		457	457	481	460		(3)		(3)		457				5	11/15/2023	1.A FE	
36204G-13-0	GN 369830 - RMBS		03/01/2022	Paydown		485	485	542	530		(46)		(46)		485				5	12/15/2023	1.A FE	
<b>0109999999 Subtotal - Bonds - U.S. Governments</b>																			11	XXX	XXX	
282726-DM-7	EL CAMINO CALIF CMNTY COLLEGE DIST		01/20/2022	BARCLAYS CAPITAL INC.		1,933,300	2,000,000	1,954,160	1,958,970		598		598		1,959,568		(26,268)	(26,268)		08/01/2025	1.B FE	
<b>0709999999 Subtotal - Bonds - U.S. Political Subdivisions of States, Territories and Possessions</b>																					XXX	XXX
04048R-DP-8	ARIZONA BRD REGENTS ARIZ ST UNIV SYS REV		01/20/2022	STIFEL NICOLAUS & COMPANY INC.		1,064,600	1,000,000	1,099,240	1,077,284		(2,699)		(2,699)		1,074,584		(9,984)	(9,984)	30,558	07/01/2023	1.C FE	
235036-G2-0	DALLAS FORT WORTH TEX INTL ARPT REV		01/20/2022	BARCLAYS CAPITAL INC.		1,035,220	1,000,000	1,060,040	1,039,629		(2,500)		(2,500)		1,037,129		(1,909)	(1,909)	10,972	11/01/2026	1.E FE	
419794-G4-8	HAWAII ST ARPTS SYS REV		01/01/2022	Direct		455,000	455,000	457,361	455,000						455,000					07/01/2024	1.E FE	
45656T-AY-4	INDUSTRY CALIF PUB FACS AUTH TAX ALLOCAT		01/01/2022	Call @ 100.00		1,071,794	990,000	1,087,416	1,073,376		(18)		(18)		1,073,358		(83,358)	(83,358)		07/01/2024	1.C FE	
626207-YM-0	MUNICIPAL ELEC AUTH GA		03/03/2022	Call @ 100.00		21,000	21,000	22,958			(3)		(3)		22,699		(1,699)	(1,699)		04/01/2057	1.F FE	
67908P-AX-4	OKLAHOMA ST CAPITOL IMPT AUTH REV		02/10/2022	Call @ 100.00		185,000	185,000	206,157	203,952		(591)		(591)		203,360		(18,360)	(18,360)	4,926	07/01/2025	1.D FE	
89602N-US-6	TRIBOROUGH BRDG & TUNL AUTH N Y REVS		01/20/2022	GMS Group via Pershing		446,667	425,000	459,264	452,933		(812)		(812)		452,121		(5,455)	(5,455)	3,172	11/15/2023	1.E FE	
<b>0909999999 Subtotal - Bonds - U.S. Special Revenues</b>																				49,628	XXX	XXX
008684-AA-0	AHMA 2006-6 A1A - CMO/RMBS		03/25/2022	Paydown		410,328	566,746	407,009	456,542		(46,214)		(46,214)		410,328				241	12/25/2046	1.D FM	
02660X-AD-6	AHMA 2006-2 2A1 - RMBS		03/25/2022	Paydown		67,730	61,923	46,908	50,100		17,630		17,630		67,730				29	09/25/2046	1.D FM	
07387U-FW-6	BSABS 2006-1M1 A3 - RMBS		03/25/2022	Paydown		152,800	151,054	152,941	154,190		(1,390)		(1,390)		152,800				162	04/25/2036	1.A FM	
07401M-AG-6	BSMF 2007-AR1 2A3 - RMBS		03/25/2022	Paydown		103,429	101,923	93,932	102,681		747		747		103,429					02/25/2037	1.A FM	
07401N-AA-7	BSMF 2006-AR5 1A1 - RMBS		03/25/2022	Paydown		169,233	169,233	147,768	149,088		20,145		20,145		169,233				70	12/26/2036	1.A FM	
07401T-AA-4	BSMF 2007-AR2 A1 - RMBS		03/25/2022	Paydown		149,038	149,038	101,362	101,362		47,676		47,676		149,038				59	03/25/2037	1.A FM	
07401Y-AA-3	BSMF 2007-AR4 1A1 - RMBS		03/25/2022	Paydown		80,997	80,997	68,150	68,993		12,004		12,004		80,997				42	04/27/2037	1.A FM	
09539#-AC-1	BLUE EAGLE 18-1_C (A RATED) - ABS		01/15/2022	Direct		83,597	83,597	83,597	83,597						83,597				799	05/23/2034	1.F PL	
09539#-AD-9	BLUE EAGLE 18-1_D (BBB RATED) - ABS		01/15/2022	Direct		171,446	171,446	171,446	171,446						171,446				2,205	05/23/2034	2.B PL	
10010Y-AA-0	TURK HAVA YOLLARI AO - ABS		03/15/2022	Paydown		9,979	9,415	(537)	537				537						210	09/15/2028	4.B FE	
11042A-AA-2	BRITISH AIRWAYS PASS THROUGH TRUST 2013		03/20/2022	Paydown		15,924	15,924	16,792	16,746		(822)		(822)		15,924				184	12/20/2025	1.F FE	
11043X-AA-1	BRITISH AIRWAYS 2019-1 PASS THROUGH TRUS		03/15/2022	Paydown		2,702	2,702	2,791	2,791		(90)		(90)		2,702				22	06/15/2034	1.F FE	
12566Q-AG-8	CIALT 2007-A1 1A7 - CMO/RMBS		03/01/2022	Paydown		33,606	32,536	27,994	29,813		3,793		3,793		33,606				301	01/25/2037	2.B FM	
12566X-AK-4	CIALT 2007-A7 2A1 - CMO/RMBS		03/25/2022	Paydown		20,642	21,116	17,160	18,782		1,860		1,860		20,642				14	07/25/2037	2.B FM	
126650-BV-1	CVSPAS 2010 CTF - CMBS		03/10/2022	Paydown		8,375	10,647	12,700	10,303		(1,928)		(1,928)		8,375				103	01/10/2033	2.B FE	
126650-BY-5	CVSPAS 2011 CTF - CMBS		03/10/2022	Paydown		1,424	1,424	1,741	1,733		(310)		(310)		1,424				14	01/10/2034	2.B FE	
12667G-LB-4	CIALT 2005-27 1A2 - CMO/RMBS		03/01/2022	Paydown		24,323	24,323	12,453	14,092		10,232		10,232		24,323				60	08/25/2035	1.D FM	
12667G-MF-7	CIALT 2005-16 A4 - CMO/RMBS		03/25/2022	Paydown		25,753	25,753	12,836	15,187		10,566		10,566		25,753				23	06/25/2035	1.D FM	
12667G-NS-8	CIALT 2005-24 1A1 - CMO/RMBS		03/01/2022	Paydown		50,865	50,181	34,933	32,981		17,883		17,883		50,865				77	07/20/2035	1.D FM	
12667G-Y9-8	CIALT 2005-38 A1 - CMO/RMBS		03/01/2022	Paydown		31,247	31,247	25,270	25,337		5,910		5,910		31,247				92	09/25/2035	1.D FM	
12667G-Z3-0	CIALT 2005-38 A3 - CMO/RMBS		03/25/2022	Paydown		54,162	54,162	42,022	42,748		11,414		11,414		54,162				81	09/25/2035	1.D FM	
12668A-EV-3	CIALT 2005-59 1A1 - CMO/RMBS		03/22/2022	Paydown		179,286	179,286	131,601	137,487		41,799		41,799		179,286				276	11/20/2035	1.D FM	
12668A-GN-9	CIALT 2005-56 1A1 - CMO/RMBS		03/25/2022	Paydown		91,832	91,832	44,496	47,176		44,656		44,656		91,832				214	11/25/2035	1.D FM	
12668A-TN-5	CIALT 2005-62 1A1 - CMO/RMBS		03/25/2022	Paydown		100,392	100,392	75,531	71,552		28,840		28,840		100,392				132	12/25/2035	1.D FM	
126694-D7-0	CIHL 2006-HYB2 4A1 - CMO/RMBS		03/01/2022	Paydown		12,628	7,293	6,018	11,890		738		738		12,628				4	04/22/2036	1.A FM	
17312V-AD-0	CIULTI 2007-6 12A - CMO/RMBS		03/01/2022	Paydown		142,327	129,789	51,912	46,493		95,834		95,834		142,327				622	03/25/2037	1.D FM	
17312V-AE-8	CIULTI 2007-6 13A - CMO/RMBS		03/01/2022	Paydown		134,134	134,079	46,389	62,779		71,355		71,355		134,134				603	03/25/2037	1.D FM	
23242G-AE-4	CIALT 2006-0A16 A2 - RMBS		03/25/2022	Paydown		8,860	8,860	5,793	6,283		2,577		2,577		8,860				8	10/25/2046	1.A FM	
23245Q-AA-7	CIALT 2006-0A21 A1 - CMO/RMBS		03/21/2022	Paydown		92,458	92,458	57,883	59,172		33,286		33,286		92,458				64	03/20/2047	1.D FM	
23332U-GH-0	DSL A 2006-AR1 21A - RMBS		03/01/2022	Paydown		390,472	390,472	334,076	337,445		53,027		53,027		390,472				675	04/19/2046	1.D FM	
26362#-AA-1	DUBLIN ASSET HOLDINGS - ABS		03/15/2022	Direct		200,718	200,718	200,718	200,718						200,718					11/30/2067	1.F PL	
26362#-AB-9	DUBLIN ASSET HOLDINGS A2 - ABS		03/15/2022	Direct		148,394	148,394	148,394	148,394						148,394					11/30/2067	1.F PL	
30290M-AQ-0	FREMIF 2012-K19 C - CMBS		02/14/2022	MORGAN STANLEY & COMPANY		11,500,449	11,500,000	10,666,250	11,455,355		28,997		28,997		11,484,352		16,097	16,097	95,778	05/25/2045	1.A FM	
32029G-AC-8	FFML 2007-FF2 A2B - RMBS		03/25/2022	Paydown		568,742	568,742	323,879	294,069		274,673		274,673		568,742				193	03/25/2037	1.D FM	
3622EB-AE-5	GSAA 2006-15 AF5 - RMBS		03/01/2022	Paydown		88,379	88,379	39,052	29,063		59,316		59,316		88,379				353	09/25/2036	1.D FM	
3622EB-AF-2	GSAA 2006-15 AF6 - RMBS		03/01/2022	Paydown		113,569	113,569	49,897	37,147		76,422		76,422		113,569				454	09/25/2036	1.D FM	
3622EQ-AC-9	GSAA 2007-1 2A1 - RMBS		03/25/2022	Paydown		363,040	363,040	289,973	262,597		100,443		100,443		363,040				179	02/25/2037	1.D FM	

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STATEMENT AS OF MARCH 31, 2022 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
39538H-EA-2	GPWF 2005-AR5 1A1 - CMO/RMBS		03/25/2022	Paydown		156,536	156,536	134,550	136,226		20,310		20,310		156,536				250	11/25/2045	1.A FM
39538H-HF-8	GPWF 2006-AR3 4A1 - RMBS		03/25/2022	Paydown		893,202	893,202	658,858	681,143		212,059		212,059		893,202				660	04/25/2036	1.A FM
41161P-L4-3	HVMTL 2006-4 21A - CMO/RMBS		03/21/2022	Paydown		30,312	30,312	13,591	12,329		17,983		17,983		30,312				21	05/19/2046	1.D FM
41161P-WC-3	HVMTL 2005-13 2A2 - CMO/RMBS		03/21/2022	Paydown		8,183	8,183	6,583	5,667		2,516		2,516		8,183				23	02/19/2036	1.D FM
41161Q-AB-7	HVMTL 2006-3 2A - CMO/RMBS		03/01/2022	Paydown		30,701	30,701	15,486	13,343		17,358		17,358		30,701				81	06/19/2036	1.D FM
41162C-AC-5	HVMTL 2006-10 21A - RMBS		03/21/2022	Paydown		412,980	412,980	343,066	361,434		51,546		51,546		412,980				200	11/19/2036	1.A FM
411640-AA-3	HVMTL 2007-7 1AA - RMBS		03/25/2022	Paydown		766,635	764,798	706,488	712,432		54,203		54,203		766,635				1,162	10/25/2037	1.D FM
419838-AA-5	HAWAIIAN AIRLINES 2013-1 PASS THROUGH TR		03/30/2022	Various		220,568	240,443	239,498	239,549		52		52		239,601		(19,034)	(19,034)	6,656	07/15/2027	4.B FE
456612-AA-8	INDX 2006-AR6 A1A - RMBS		03/01/2022	Paydown		212,737	212,737	195,053	206,324		6,414		6,414		212,737				352	06/25/2046	3.B FM
45661E-AA-2	INDX 2006-AR2 A1A - RMBS		03/25/2022	Paydown		179,883	179,883	143,930	147,953		31,931		31,931		179,883				146	04/25/2046	1.D FM
45661E-AV-6	INDX 2006-AR4 A1A - RMBS		03/25/2022	Paydown		114,565	114,565	95,191	99,843		14,721		14,721		114,565				75	05/25/2046	1.A FM
45661E-DE-1	INDX 2006-AR7 5A1 - CMO/RMBS		03/01/2022	Paydown		15,672	15,672	7,169	7,315		15,672		15,672		15,672				44	05/25/2036	1.A FM
45661K-AA-8	INDX 2006-AR11 1A1 - CMO/RMBS		03/01/2022	Paydown		30,015	19,468	18,068	29,902		112		112		30,015				1,249	06/25/2036	1.D FM
456738-AA-7	INFINITY ASSET HOLDINGS LLC - ABS		03/15/2022	Direct		107,094	107,094	107,094	107,094						107,094				1,249	12/15/2067	1.G PL
456758-AH-0	INFINITY LD ASSET HOLDINGS LLC A7 - ABS		03/15/2022	Direct		86,071	86,071	86,071	86,071						86,071				628	12/31/2067	1.F PL
466302-AG-1	JPALT 2006-S4 A4 - RMBS		03/01/2022	Paydown		615,796	609,670	359,312	486,112		129,684		129,684		615,796				7,329	12/25/2036	1.D FM
466306-AA-5	JPALT 2008-R2 A1 - CMO/RMBS		03/01/2022	Paydown		51,286	52,043	32,723	28,803		22,483		22,483		51,286				613	06/25/2038	1.D FM
478045-AA-5	JOHN SEVIER COMBINED CYCLE GENERATION LL		01/15/2022	Paydown		19,329	19,329	23,659	23,598		(4,269)		(4,269)		19,329				447	01/15/2042	1.C FE
52522D-AL-5	LXS 2006-16N A31 - RMBS		03/25/2022	Paydown		303,055	303,055	260,606	280,397		22,658		22,658		303,055				281	11/25/2046	1.A FM
52522D-AM-3	LXS 2006-16N A4A - RMBS		03/25/2022	Paydown		8,823	8,823	7,025	7,447		1,376		1,376		8,823				8	11/25/2046	1.A FM
52524G-AA-0	LXS 2007-7N A1A - RMBS		03/25/2022	Paydown		300,320	300,313	242,278	267,061		33,259		33,259		300,320				227	06/25/2047	1.D FM
550279-BA-0	LUM 2006-2 A1A - CMO/RMBS		03/25/2022	Paydown		120,316	119,155	78,794	81,549		38,767		38,767		120,316				99	02/25/2046	1.D FM
55275T-AE-8	MABS 2007-WMC1 A5 - RMBS		03/25/2022	Paydown		204,038	204,038	19,965	19,681		184,357		184,357		204,038				116	01/25/2037	1.D FM
59025E-AT-3	MANA 2007-0AR4 A2 - RMBS		03/25/2022	Paydown		60,956	56,769	26,645	32,421		28,534		28,534		60,956				66	08/25/2037	1.A FM
61751D-AG-9	MSM 2006-17XS A4 - RMBS		03/01/2022	Paydown		58,086	58,086	24,936	19,370		38,716		38,716		58,086				126	10/25/2046	1.D FM
61752J-AA-8	MSM 2007-1XS 1A1 - RMBS		02/01/2022	Paydown		10,724	10,724	5,523	4,908		5,816		5,816		10,724				21	09/25/2046	1.D FM
61756V-AC-3	MSM 2007-14AR 1A3 - CMO/RMBS		03/01/2022	Paydown		470	470	114	79		391		391		470				3	10/25/2037	1.D FM
64829J-AN-3	NRZT 2017-1 B1 - CMO/RMBS		03/01/2022	Paydown		71,008	71,008	73,439	72,247		(1,239)		(1,239)		71,008				595	02/26/2057	1.A FM
65535V-MY-1	NAA 2005-AR4 4A1 - RMBS		03/01/2022	Paydown		47,259	47,259	29,106	29,032		18,227		18,227		47,259					08/25/2035	1.D FM
65538D-AA-3	NAA 2006-AR4 A1A - RMBS		03/25/2022	Paydown		115,874	115,098	76,066	77,279		38,596		38,596		115,874				65	12/25/2036	1.A FM
65538D-AE-5	NAA 2006-AR4 A4A - RMBS		03/25/2022	Paydown		133,847	132,954	89,007	90,611		43,236		43,236		133,847				98	12/25/2036	1.A FM
74922H-AA-0	RALI 2007-QH1 A1 - RMBS		03/25/2022	Paydown		166,455	166,455	134,199	141,360		25,095		25,095		166,455				123	02/25/2037	1.A FM
74922T-AA-4	RALI 2007-QH4 A1 - RMBS		03/25/2022	Paydown		242,935	242,935	191,503	200,766		42,170		42,170		242,935				155	05/26/2037	1.A FM
75115F-AD-2	RALI 2006-Q08 A3A - RMBS		03/25/2022	Paydown		1,591,825	1,516,740	1,079,543	1,301,378		290,448		290,448		1,591,825				1,324	10/25/2046	1.A FM
75116C-AA-4	RALI 2007-QS6 A1 - CMO/RMBS		03/25/2022	Paydown		63,049	72,161	44,730	45,562		17,487		17,487		63,049				46	04/25/2037	1.D FM
76111X-P6-4	RFMSI 2006-S3 A8 - CMO/RMBS		03/01/2022	Paydown		24,369	23,493	21,279	21,025		3,344		3,344		24,369				198	03/25/2036	2.B FM
78409V-AV-6	S&P GLOBAL INC		03/21/2022	Call @ 100.00		3,548,643	3,425,000	3,416,961	3,421,190		379		379		3,421,569				174,675	05/01/2024	1.G FE
78409V-AX-2	S&P GLOBAL INC		03/24/2022	Call @ 100.00		4,244,160	4,000,000	4,005,960	4,004,026		(204)		(204)		4,003,822		(3,822)	(3,822)	338,400	03/01/2026	1.G FE
78443C-CM-4	SLMA 2006-A B - ABS		03/15/2022	Paydown		402,618	402,618	372,170	393,572		9,047		9,047		402,618				506	06/15/2039	1.B FE
78443D-AD-4	SLMA 2007-A A4 - ABS		03/15/2022	Paydown		182,846	182,846	161,526	171,030		11,816		11,816		182,846				202	12/16/2041	1.A FE
85554N-AJ-9	STARM 2007-3 2A1 - CMO/RMBS		03/01/2022	Paydown		18,104	12,094	11,569	18,046		57		57		18,104					06/25/2037	1.D FM
86358R-RA-1	SASC 2002-14A 1A1 - CMO/RMBS		03/01/2022	Paydown		3,320	3,320	1,494	3,320		3,320		3,320		3,320				21	07/25/2032	1.A FM
86361B-AJ-6	SARM 2006-7 4A1 - CMO/RMBS		03/01/2022	Paydown		48,814	48,814	12,892	10,302		38,511		38,511		48,814				429	08/25/2036	1.D FM
86364D-AA-8	SARM 2007-7 1A1 - CMO/RMBS		03/25/2022	Paydown		186,183	186,183	145,902	150,102		36,081		36,081		186,183				89	08/25/2037	1.D FM
869099-AH-4	TRUIST FINANCIAL CORP		01/19/2022	DEUTSEC		1,023,650	1,000,000	1,050,312	1,029,904		(2,481)		(2,481)		1,027,423		(3,773)	(3,773)	23,142	08/15/2022	1.G FE
885220-BR-3	TMST 2002-3 A3 - CMO/RMBS		03/01/2022	Paydown		4,217	4,216	3,889	4,010		207		207		4,217				13	09/25/2042	1.A FM
885220-EC-3	TMST 2003-5 2A - CMO/RMBS		03/01/2022	Paydown		13,756	13,756	10,217	9,079		4,677		4,677		13,756				71	10/25/2043	1.A FM
885220-GZ-0	TMST 2005-1 A1 - CMO/RMBS		03/01/2022	Paydown		2,708	2,708	865	865		2,708		2,708		2,708				11	04/25/2045	1.A FM
88522U-AC-1	TMST 2008-1 2A1 - CMO/RMBS		03/01/2022	Paydown		71,428	56,444	43,922	71,299		129		129		71,428				11	04/25/2038	1.D FM
89566E-AB-4	TRI-STATE GENERATION AND TRANSMISSION AS		01/31/2022	Paydown		219,180	219,180	275,778	281,641		(62,461)		(62,461)		219,180				7,829	07/31/2033	2.A FE
90352J-AA-1	UBS GROUP AG	C	01/19/2022	JP Morgan Securities Inc		4,335,819	4,300,000	4,390,386	4,353,047		(7,098)		(7,098)		4,345,949		(10,130)	(10,130)	23,768	05/23/2023	1.G FE

STATEMENT AS OF MARCH 31, 2022 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	
91754R-ZE-0	UTSHGR 2016-1 B - ABS		03/24/2022	Call @ 100.00		10,528,375	10,450,000	9,298,306	9,680,267		90,336		90,336		9,770,603		679,397	679,397	119,548	09/25/2056	1.C FE	
91754R-ZG-5	UTSHGR 2017-1 B - ABS		03/23/2022	Call @ 100.00		10,060,000	10,000,000	9,225,400	9,583,366		38,361		38,361		9,621,727		378,273	378,273	99,400	01/25/2057	1.F FE	
92927B-AA-0	WAMU 2007-0A6 1A - CMO/RMBS		03/01/2022	Paydown		390,321	390,321	317,880	315,772		74,549		74,549		390,321				677	07/25/2047	1.D FM	
93364A-AB-8	WAMU 2007-0A3 2A - CMO/RMBS		03/01/2022	Paydown		335,026	320,787	261,210	271,720		63,306		63,306		335,026				509	04/25/2047	1.D FM	
939336-DH-3	WAMU 2002-AR14 A2 - CMO/RMBS		03/01/2022	Paydown		37	37	30	30		7		7		37					11/25/2032	1.D FM	
93934F-OP-0	WMALT 2006-AR3 A1A - CMO/RMBS		03/01/2022	Paydown		43,453	47,656	25,521	28,412		15,041		15,041		43,453				70	05/25/2046	1.D FM	
93935H-AF-4	WMALT 2006-7 A3 - RMBS		03/01/2022	Paydown		88,075	88,075	37,296	29,030		59,045		59,045		88,075				262	09/25/2036	1.D FM	
94985K-AA-5	WFALT 2007-PA6 A1 - CMO/RMBS		03/01/2022	Paydown		129,204	132,427	112,881	110,664		18,539		18,539		129,204				750	12/28/2037	1.D FM	
94988G-AQ-6	WFMLT 2012-RR2 3A2 - CMO/RMBS		03/28/2022	Paydown		1,019,088	1,019,088	671,029	784,700		234,387		234,387		1,019,088				383	03/27/2047	1.D FM	
BGA10A-CQ-8	INFINITY ASSET HLD 2020 CLASS A - ABS		03/25/2022	Direct		204,698	204,698	204,698			(97)		(97)		204,698				645	03/15/2056	1.F PL	
BGA107-YP-3	INFINITY ASSET HOLDINGS 2020-1 A30		01/03/2022	INFINITY		4,294,550	4,294,550	4,294,550	4,294,550						4,294,550					06/24/2070	1.F PL	
BGA107-YQ-1	INFINITY ASSET HOLDINGS 2020-1 A31		01/03/2022	INFINITY		10,020,616	10,020,616	10,020,616	10,020,616						10,020,616					06/24/2070	1.F PL	
1109999999	Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)					74,687,159	74,153,556	67,928,913	69,877,594		3,058,154		3,058,154		73,140,542		1,040,440	1,040,440	919,184	XXX	XXX	
2509999997	Total - Bonds - Part 4					80,900,681	80,230,498	74,276,532	76,162,430		3,052,080		3,052,080		79,419,304		893,406	893,406	968,822	XXX	XXX	
2509999998	Total - Bonds - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
2509999999	Total - Bonds					80,900,681	80,230,498	74,276,532	76,162,430		3,052,080		3,052,080		79,419,304		893,406	893,406	968,822	XXX	XXX	
4509999997	Total - Preferred Stocks - Part 4						XXX													XXX	XXX	
4509999998	Total - Preferred Stocks - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
4509999999	Total - Preferred Stocks						XXX													XXX	XXX	
5989999997	Total - Common Stocks - Part 4						XXX													XXX	XXX	
5989999998	Total - Common Stocks - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
5989999999	Total - Common Stocks						XXX													XXX	XXX	
5999999999	Total - Preferred and Common Stocks						XXX													XXX	XXX	
6009999999	Totals					80,900,681	XXX	74,276,532	76,162,430		3,052,080		3,052,080		79,419,304		893,406	893,406	968,822	XXX	XXX	

E05.2

STATEMENT AS OF MARCH 31, 2022 OF THE First Allmerica Financial Life Insurance Company

**SCHEDULE DB - PART A - SECTION 1**

Showing all Options, Caps, Floors, Collars, Swaps and Forwards Open as of Current Statement Date

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23			
Description	Description of Item(s) Hedged, Used for Income Generation or Replicated	Schedule/ Exhibit Identifier	Type(s) of Risk(s) (a)	Exchange, Counterparty or Central Clearinghouse	Trade Date	Date of Maturity or Expiration	Number of Contracts	Notional Amount	Received (Paid)	Index	Cumulative Price Change (Received) (Paid)	Current Year Initial Un-counted (Received) (Paid)	Current Year Income	Book/ Adjusted Carrying Value	Code	Fair Value	Unrealized Valuation Increase/ (Decrease)	Total Foreign Exchange Change in B./A.C.V.	Current Year's (Amortization)/ Accretion	Adjustment to Carrying Value of Hedged Item	Potential Exposure	Credit Quality of Reference Entity	Hedge Effectiveness at Inception and at Quarter-end (b)		
1759999999 - Totals															XXX									XXX	XXX

NONE

(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 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	
ESM2	2	453,825	EMINI S&P JUN2	Fixed Index Annuity	Annual Exh 5 Reserve	Equity/Index	06/17/2022	JPMorgan Chase Bank	03/11/2022	4,247.8000	4,538.2500	29,045	29,045	29,045					24,000	12,000.00	50	
1539999999. Subtotal - Long Futures - Hedging Other													29,045	29,045	29,045					24,000	XXX	XXX
1579999999. Subtotal - Long Futures													29,045	29,045	29,045					24,000	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													29,045	29,045	29,045					24,000	XXX	XXX
1719999999. Subtotal - Replication																					XXX	XXX
1729999999. Subtotal - Income Generation																					XXX	XXX
1739999999. Subtotal - Other																					XXX	XXX
1749999999. Subtotal - Adjustments for SSAP No. 108 Derivatives																					XXX	XXX
1759999999 - Totals													29,045	29,045	29,045					24,000	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**



