LIFE ACCIDENT AND HEALTH COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF MARCH 31, 2011

OF THE CONDITION AND AFFAIRS OF THE

ReliaStar Life Insurance Company

NAIC Group Code 0229 (Current) 0229 (Prior) NAIC Company Code 67105 Employer's ID Number 41-0451140

Organized under the Laws of Minnesota, State of Domicile or Port of Entry Minnesota

Country of Domicile United States of America

Incorporated/Organized 09/15/1885 Commenced Business 09/15/1885

Statutory Home Office 20 Washington Avenue South (Street and Number), Minneapolis , MN 55401 (City or Town, State and Zip Code)

Main Administrative Office 5780 Powers Ferry Road, NW (Street and Number)

Atlanta , GA 30327-4390 (City or Town, State and Zip Code), 770-980-5100 (Area Code) (Telephone Number)

Mail Address 5780 Powers Ferry Road, NW (Street and Number or P.O. Box), Atlanta , GA 30327-4390 (City or Town, State and Zip Code)

Primary Location of Books and Records 20 Washington Avenue South (Street and Number)

Minneapolis , MN 55401 (City or Town, State and Zip Code), 612-372-5432 (Area Code) (Telephone Number)

Internet Website Address www.ing.com/us

Statutory Statement Contact Robin Proud (Name), 770-541-3148 (Area Code) (Telephone Number)

FSSC_Compliance@us.ing.com (E-mail Address), 770-980-5800 (FAX Number)

OFFICERS

President	Donald Wayne Britton, President	Treasurer	David Scott Pendergrass, SVP and Treasurer
Secretary	Joy Michelle Benner, Secretary	Appointed Actuary	Francis de Regnaucourt, VP and Appointed Actuary

OTHER

Boyd George Combs, Senior Vice President, Tax	Ralph Robert Ferraro, Senior Vice President	Timothy Thomas Matson, Senior Vice President
Daniel Patrick Mulheran, Sr., Senior Vice President	Steven Todd Pierson, SVP and Chief Accounting Officer	Prakash Ambadas Shimpi, Senior Vice President
Catherine Hale Smith, Senior Vice President	Ewout Lucien Steenbergen, EVP and Chief Financial Officer	

DIRECTORS OR TRUSTEES

Donald Wayne Britton, Director	Patrick Gerard Flynn, Director and Chairman #	Lynne Rogich Ford, Director
Robert Graham Leary, Director	Catherine Hale Smith, Director	Michael Scott Smith, Director
Ewout Lucien Steenbergen, Director		

State of Georgia/Minnesota
County of Fulton/Hennepin 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.

Donald Wayne Britton President	Joy Michelle Benner Secretary	David Scott Pendergrass Treasurer
Subscribed and sworn to before me this 9 day of May 2011	Subscribed and sworn to before me this 27 day of April 2011	Subscribed and sworn to before me this 21 day of April 2011

MELISSA O'DONNELL
Notary Public
Minnesota
My Commission Expires January 31, 2015

KATHLEEN L. CARLSON
Notary Public
Minnesota
My Commission Expires January 31, 2014

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 .....

KIM R. HATFIELD
NOTARY PUBLIC
COBB COUNTY, GA
COMMISSION EXPIRES NOVEMBER 15, 2013

ASSETS

		Current Statement Date			4
		1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	December 31 Prior Year Net Admitted Assets
1.	Bonds	12,631,836,416	0	12,631,836,416	12,458,399,609
2.	Stocks:				
	2.1 Preferred stocks	62,997,249	0	62,997,249	57,537,250
	2.2 Common stocks	396,606,864	0	396,606,864	384,808,171
3.	Mortgage loans on real estate:				
	3.1 First liens	1,963,076,357	0	1,963,076,357	1,965,481,216
	3.2 Other than first liens	0	0	0	0
4.	Real estate:				
	4.1 Properties occupied by the company (less $ 0 encumbrances)	8,947,979	0	8,947,979	9,078,386
	4.2 Properties held for the production of income (less $ 0 encumbrances)	5,000,000	0	5,000,000	5,000,000
	4.3 Properties held for sale (less $ 0 encumbrances)	0	0	0	0
5.	Cash ($ 44,271,863), cash equivalents ($ 0) and short-term investments ($ 521,610,188)	565,882,051	0	565,882,051	604,431,273
6.	Contract loans (including $ 0 premium notes)	655,898,407	0	655,898,407	663,679,478
7.	Derivatives	68,132,732	0	68,132,732	79,855,817
8.	Other invested assets	998,937,689	12,730,309	986,207,380	929,163,713
9.	Receivables for securities	1,999,495	0	1,999,495	1,402,344
10.	Securities lending reinvested collateral assets	77,093,409	0	77,093,409	222,439,438
11.	Aggregate write-ins for invested assets	0	0	0	0
12.	Subtotals, cash and invested assets (Lines 1 to 11)	17,436,408,648	12,730,309	17,423,678,339	17,381,276,695
13.	Title plants less $ 0 charged off (for Title insurers only)	0	0	0	0
14.	Investment income due and accrued	232,856,234	0	232,856,234	217,459,431
15.	Premiums and considerations:				
	15.1 Uncollected premiums and agents' balances in the course of collection	(156,126,472)	7,524,095	(163,650,567)	229,132,915
	15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including $ 0 earned but unbilled premiums)	131,961,319	0	131,961,319	122,427,465
	15.3 Accrued retrospective premiums	0	0	0	0
16.	Reinsurance:				
	16.1 Amounts recoverable from reinsurers	168,442,850	0	168,442,850	187,052,675
	16.2 Funds held by or deposited with reinsured companies	16,252,740	0	16,252,740	55,035,608
	16.3 Other amounts receivable under reinsurance contracts	140,362,123	0	140,362,123	(162,576,072)
17.	Amounts receivable relating to uninsured plans	243,570	0	243,570	196,888
18.1	Current federal and foreign income tax recoverable and interest thereon	0	0	0	80,470,099
18.2	Net deferred tax asset	492,408,050	230,585,379	261,822,671	273,538,198
19.	Guaranty funds receivable or on deposit	6,733,146	0	6,733,146	6,733,146
20.	Electronic data processing equipment and software	0	0	0	0
21.	Furniture and equipment, including health care delivery assets ($ 0)	0	0	0	0
22.	Net adjustment in assets and liabilities due to foreign exchange rates	8,356,389	0	8,356,389	8,001,288
23.	Receivables from parent, subsidiaries and affiliates	40,189,016	770,758	39,418,258	149,227,442
24.	Health care ($ 0) and other amounts receivable	9,884,757	9,884,757	0	0
25.	Aggregate write-ins for other than invested assets	109,770,419	101,558,013	8,212,406	8,212,406
26.	Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	18,637,742,789	363,053,311	18,274,689,478	18,556,188,184
27.	From Separate Accounts, Segregated Accounts and Protected Cell Accounts	2,310,992,121	0	2,310,992,121	2,255,258,319
28.	Total (Lines 26 and 27)	20,948,734,910	363,053,311	20,585,681,599	20,811,446,503
	DETAILS OF WRITE-INS				
1101.					
1102.					
1103.					
1198.	Summary of remaining write-ins for Line 11 from overflow page	0	0	0	0
1199.	Totals (Lines 1101 through 1103 plus 1198)(Line 11 above)	0	0	0	0
2501.	Non-qualified intangible pension asset	8,212,406	0	8,212,406	8,212,406
2502.	IMR (if negative)	96,701,451	96,701,451	0	0
2503.	Other assets	4,856,562	4,856,562	0	0
2598.	Summary of remaining write-ins for Line 25 from overflow page	0	0	0	0
2599.	Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	109,770,419	101,558,013	8,212,406	8,212,406

LIABILITIES, SURPLUS AND OTHER FUNDS

		1 Current Statement Date	2 December 31 Prior Year
1.	Aggregate reserve for life contracts $ 13,338,599,644 less $ 0 included in Line 6.3 (including $ 965,446,036 Modco Reserve)	13,338,599,644	13,218,324,996
2.	Aggregate reserve for accident and health contracts (including $ 0 Modco Reserve)	290,632,289	304,339,719
3.	Liability for deposit-type contracts (including $ 0 Modco Reserve)	737,599,049	715,180,873
4.	Contract claims:		
	4.1 Life	91,385,030	98,999,337
	4.2 Accident and health	30,890,845	27,016,552
5.	Policyholders' dividends $ 6,762 and coupons $ 0 due and unpaid	6,762	9,525
6.	Provision for policyholders' dividends and coupons payable in following calendar year - estimated amounts:		
	6.1 Dividends apportioned for payment (including $ 0 Modco)	11,046,312	11,134,819
	6.2 Dividends not yet apportioned (including $ 0 Modco)	0	0
	6.3 Coupons and similar benefits (including $ 0 Modco)	0	0
7.	Amount provisionally held for deferred dividend policies not included in Line 6	0	0
8.	Premiums and annuity considerations for life and accident and health contracts received in advance less $ 0 discount; including $ 0 accident and health premiums	3,307,333	1,974,165
9.	Contract liabilities not included elsewhere:		
	9.1 Surrender values on canceled contracts	0	0
	9.2 Provision for experience rating refunds, including $ 2,944,889 accident and health experience rating refunds	27,666,059	31,169,841
	9.3 Other amounts payable on reinsurance, including $ 0 assumed and $ 0 ceded	0	363,566,723
	9.4 Interest Maintenance Reserve	0	0
10.	Commissions to agents due or accrued-life and annuity contracts $ 9,628,835 , accident and health $ 4,881,164 and deposit-type contract funds $ 0	14,509,999	24,188,065
11.	Commissions and expense allowances payable on reinsurance assumed	8,799,202	7,006,747
12.	General expenses due or accrued	54,238,780	60,899,625
13.	Transfers to Separate Accounts due or accrued (net) (including $ (83,800,194) accrued for expense allowances recognized in reserves, net of reinsured allowances)	(73,554,811)	(75,454,066)
14.	Taxes, licenses and fees due or accrued, excluding federal income taxes	12,745,577	14,129,569
15.1	Current federal and foreign income taxes, including $ (2,778,409) on realized capital gains (losses)	13,828,866	0
15.2	Net deferred tax liability	0	0
16.	Unearned investment income	26,023,640	31,746,342
17.	Amounts withheld or retained by company as agent or trustee	24,927,400	23,977,526
18.	Amounts held for agents' account, including $ 4,614,116 agents' credit balances	4,614,116	6,753,906
19.	Remittances and items not allocated	61,140,918	81,325,642
20.	Net adjustment in assets and liabilities due to foreign exchange rates	0	0
21.	Liability for benefits for employees and agents if not included above	7,958,013	8,128,673
22.	Borrowed money $ 0 and interest thereon $ 0	0	0
23.	Dividends to stockholders declared and unpaid	0	0
24.	Miscellaneous liabilities:		
	24.01 Asset valuation reserve	75,281,756	54,808,526
	24.02 Reinsurance in unauthorized companies	11,093,982	10,603,321
	24.03 Funds held under reinsurance treaties with unauthorized reinsurers	308,730,266	321,443,837
	24.04 Payable to parent, subsidiaries and affiliates	37,906,923	26,977,128
	24.05 Drafts outstanding	0	0
	24.06 Liability for amounts held under uninsured plans	0	0
	24.07 Funds held under coinsurance	647,329,346	670,007,333
	24.08 Derivatives	100,687,886	114,793,430
	24.09 Payable for securities	29,092,703	8,835,410
	24.10 Payable for securities lending	77,093,409	222,439,438
	24.11 Capital notes $ 0 and interest thereon $ 0	0	0
25.	Aggregate write-ins for liabilities	93,640,724	93,713,641
26.	Total liabilities excluding Separate Accounts business (Lines 1 to 25)	16,067,222,018	16,478,040,643
27.	From Separate Accounts Statement	2,310,992,121	2,255,258,319
28.	Total liabilities (Lines 26 and 27)	18,378,214,139	18,733,298,962
29.	Common capital stock	2,500,000	2,500,000
30.	Preferred capital stock	100,000	100,000
31.	Aggregate write-ins for other than special surplus funds	511,427,547	520,790,171
32.	Surplus notes	100,000,000	100,000,000
33.	Gross paid in and contributed surplus	2,059,125,094	2,007,125,093
34.	Aggregate write-ins for special surplus funds	95,116,598	102,365,572
35.	Unassigned funds (surplus)	(560,701,779)	(654,633,295)
36.	Less treasury stock, at cost:		
	36.1 0 shares common (value included in Line 29 $ 0)	0	0
	36.2 80,000 shares preferred (value included in Line 30 $ 100,000)	100,000	100,000
37.	Surplus (Total Lines 31+32+33+34+35-36) (including $ 0 in Separate Accounts Statement)	2,204,867,460	2,075,547,541
38.	Totals of Lines 29, 30 and 37	2,207,467,460	2,078,147,541
39.	Totals of Lines 28 and 38 (Page 2, Line 28, Col. 3)	20,585,681,599	20,811,446,503
	DETAILS OF WRITE-INS		
2501.	Other contingency reserves	40,810,296	40,923,931
2502.	Minimum non-qualified pension liability	19,020,671	19,020,671
2503.	Miscellaneous liabilities	16,451,056	15,507,919
2598.	Summary of remaining write-ins for Line 25 from overflow page	17,358,701	18,261,120
2599.	Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	93,640,724	93,713,641
3101.	Deferral of gain on reinsurance of existing business	511,427,547	520,790,171
3102.			
3103.			
3198.	Summary of remaining write-ins for Line 31 from overflow page	0	0
3199.	Totals (Lines 3101 through 3103 plus 3198)(Line 31 above)	511,427,547	520,790,171
3401.	Admitted deferred tax per SSAP 10R	86,967,313	94,042,898
3402.	Gain on sale/leaseback of home office property	8,149,285	8,322,674
3403.			
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0
3499.	Totals (Lines 3401 through 3403 plus 3498)(Line 34 above)	95,116,598	102,365,572

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	296,099,237	(386,382,751)	287,257,585
2.	Considerations for supplementary contracts with life contingencies	2,765,673	772,853	3,833,119
3.	Net investment income	213,617,585	223,521,298	924,053,880
4.	Amortization of Interest Maintenance Reserve (IMR)	(8,923,488)	(9,097,559)	(39,657,599)
5.	Separate Accounts net gain from operations excluding unrealized gains or losses	0	0	0
6.	Commissions and expense allowances on reinsurance ceded	128,236,468	271,077,665	772,283,194
7.	Reserve adjustments on reinsurance ceded	38,820,236	42,999,769	13,443,624
8.	Miscellaneous Income:			
	8.1 Income from fees associated with investment management, administration and contract guarantees from Separate Accounts	22,867,738	24,447,910	94,898,537
	8.2 Charges and fees for deposit-type contracts	0	0	0
	8.3 Aggregate write-ins for miscellaneous income	6,568,043	2,589,208	21,159,232
9.	Totals (Lines 1 to 8.3)	700,051,492	169,928,393	2,077,271,572
10.	Death benefits	37,090,695	(10,557,365)	97,263,134
11.	Matured endowments (excluding guaranteed annual pure endowments)	307,559	377,370	1,336,890
12.	Annuity benefits	25,118,247	28,340,840	98,292,738
13.	Disability benefits and benefits under accident and health contracts	17,855,307	(36,930,210)	(3,621,015)
14.	Coupons, guaranteed annual pure endowments and similar benefits	0	0	0
15.	Surrender benefits and withdrawals for life contracts	267,294,098	262,253,790	1,068,397,393
16.	Group conversions	0	0	0
17.	Interest and adjustments on contract or deposit-type contract funds	5,382,085	5,769,461	24,039,353
18.	Payments on supplementary contracts with life contingencies	1,542,894	1,494,883	5,972,926
19.	Increase in aggregate reserves for life and accident and health contracts	106,567,224	(474,542,709)	(277,744,090)
20.	Totals (Lines 10 to 19)	461,158,109	(223,793,940)	1,013,937,329
21.	Commissions on premiums, annuity considerations, and deposit-type contract funds (direct business only)	91,992,467	86,327,932	336,838,764
22.	Commissions and expense allowances on reinsurance assumed	13,635,623	13,171,376	37,309,599
23.	General insurance expenses	87,384,108	99,972,874	385,903,466
24.	Insurance taxes, licenses and fees, excluding federal income taxes	15,558,605	16,534,548	59,114,005
25.	Increase in loading on deferred and uncollected premiums	(6,226,215)	(9,432,280)	(153,824)
26.	Net transfers to or (from) Separate Accounts net of reinsurance	(32,731,064)	(29,709,742)	(149,745,436)
27.	Aggregate write-ins for deductions	158,394	100,520,831	497,704,753
28.	Totals (Lines 20 to 27)	630,930,027	53,591,599	2,180,908,656
29.	Net gain from operations before dividends to policyholders and federal income taxes (Line 9 minus Line 28)	69,121,465	116,336,794	(103,637,084)
30.	Dividends to policyholders	3,474,361	3,638,906	14,468,160
31.	Net gain from operations after dividends to policyholders and before federal income taxes (Line 29 minus Line 30)	65,647,104	112,697,888	(118,105,244)
32.	Federal and foreign income taxes incurred (excluding tax on capital gains)	(1,875,278)	60,515,010	30,073,116
33.	Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or (losses) (Line 31 minus Line 32)	67,522,382	52,182,878	(148,178,360)
34.	Net realized capital gains (losses) (excluding gains (losses) transferred to the IMR) less capital gains tax of $ 52,012,791 (excluding taxes of $ (4,359,826) transferred to the IMR)	(61,903,684)	(449,595)	(86,049,077)
35.	Net income (Line 33 plus Line 34)	5,618,698	51,733,283	(234,227,437)
	CAPITAL AND SURPLUS ACCOUNT			
36.	Capital and surplus, December 31, prior year	2,078,147,541	2,190,309,986	2,190,309,986
37.	Net income (Line 35)	5,618,698	51,733,283	(234,227,437)
38.	Change in net unrealized capital gains (losses) less capital gains tax of $ 7,289,423	24,309,489	69,931,744	(73,682,293)
39.	Change in net unrealized foreign exchange capital gain (loss)	70,585	7,255,397	(1,300,708)
40.	Change in net deferred income tax	18,700,090	(32,042,873)	8,039,439
41.	Change in nonadmitted assets	66,023,158	41,712,564	16,674,790
42.	Change in liability for reinsurance in unauthorized companies	(490,662)	2,684,577	(2,152,942)
43.	Change in reserve on account of change in valuation basis, (increase) or decrease	0	0	4,687,720
44.	Change in asset valuation reserve	(20,473,231)	(45,062,052)	(35,794,160)
45.	Change in treasury stock	0	0	0
46.	Surplus (contributed to) withdrawn from Separate Accounts during period	0	0	0
47.	Other changes in surplus in Separate Accounts Statement	0	0	0
48.	Change in surplus notes	0	0	0
49.	Cumulative effect of changes in accounting principles	0	0	0
50.	Capital changes:			
	50.1 Paid in	0	0	0
	50.2 Transferred from surplus (Stock Dividend)	0	0	0
	50.3 Transferred to surplus	0	0	0
51.	Surplus adjustment:			
	51.1 Paid in	52,000,000	0	50,000,000
	51.2 Transferred to capital (Stock Dividend)	0	0	0
	51.3 Transferred from capital	0	0	0
	51.4 Change in surplus as a result of reinsurance	(9,362,623)	73,929,786	368,556,856
52.	Dividends to stockholders	0	(221,000,000)	(221,000,000)
53.	Aggregate write-ins for gains and losses in surplus	(7,075,585)	(10,799,974)	8,036,290
54.	Net change in capital and surplus for the year (Lines 37 through 53)	129,319,919	(61,657,548)	(112,162,445)
55.	Capital and surplus, as of statement date (Lines 36 + 54)	2,207,467,460	2,128,652,438	2,078,147,541
	DETAILS OF WRITE-INS			
08.301.	Other income	3,485,390	2,107	9,880,865
08.302.	Fee income	1,851,336	2,008,518	7,799,993
08.303.	Premium bonus	1,231,317	578,583	3,478,374
08.398.	Summary of remaining write-ins for Line 8.3 from overflow page	0	0	0
08.399.	Totals (Lines 08.301 through 08.303 plus 08.398) (Line 8.3 above)	6,568,043	2,589,208	21,159,232
2701.	Other expenses	310,453	7,447,746	477,402
2702.	Deferral of gain on reinsurance	0	91,313,692	492,701,831
2703.	Net litigation accrual expense	(152,059)	1,759,393	4,525,520
2798.	Summary of remaining write-ins for Line 27 from overflow page	0	0	0
2799.	Totals (Lines 2701 through 2703 plus 2798)(Line 27 above)	158,394	100,520,831	497,704,753
5301.	Recognition of additional minimum pension liability	0	0	(803,744)
5302.	Change in admitted deferred tax per SSAP 10R	(7,075,585)	(10,799,974)	8,840,034
5303.				
5398.	Summary of remaining write-ins for Line 53 from overflow page	0	0	0
5399.	Totals (Lines 5301 through 5303 plus 5398)(Line 53 above)	(7,075,585)	(10,799,974)	8,036,290

CASH FLOW

		1 Current Year To Date	2 Prior Year To Date	3 Prior Year Ended December 31
	Cash from Operations			
1.	Premiums collected net of reinsurance	528,486,081	(454,412,450)	9,844,907
2.	Net investment income	233,377,495	226,096,386	1,002,597,559
3.	Miscellaneous income	(337,980,946)	368,064,135	1,245,852,150
4.	Total (Lines 1 to 3)	423,882,630	139,748,071	2,258,294,616
5.	Benefit and loss related payments	333,247,670	242,270,473	1,283,769,313
6.	Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts	(29,231,822)	(27,056,002)	(151,416,663)
7.	Commissions, expenses paid and aggregate write-ins for deductions	231,370,788	229,637,242	826,696,394
8.	Dividends paid to policyholders	3,565,631	3,700,572	14,579,445
9.	Federal and foreign income taxes paid (recovered) net of $ 0 tax on capital gains (losses)	(48,521,278)	16,593,813	126,725,582
10.	Total (Lines 5 through 9)	490,430,989	465,146,098	2,100,354,071
11.	Net cash from operations (Line 4 minus Line 10)	(66,548,359)	(325,398,027)	157,940,545
	Cash from Investments			
12.	Proceeds from investments sold, matured or repaid:			
	12.1 Bonds	573,203,591	919,545,743	4,065,925,318
	12.2 Stocks	23,315	643,372	16,064,805
	12.3 Mortgage loans	91,433,178	129,002,010	417,055,726
	12.4 Real estate	0	0	3,142,060
	12.5 Other invested assets	92,957,249	33,807,146	165,592,273
	12.6 Net gains or (losses) on cash, cash equivalents and short-term investments	(182,273)	0	(47)
	12.7 Miscellaneous proceeds	25,314,474	12,857,823	27,459,769
	12.8 Total investment proceeds (Lines 12.1 to 12.7)	782,749,534	1,095,856,094	4,695,239,904
13.	Cost of investments acquired (long-term only):			
	13.1 Bonds	785,204,425	731,356,305	4,717,800,973
	13.2 Stocks	5,553,008	9,074,826	22,225,332
	13.3 Mortgage loans	89,047,109	37,862,393	161,278,732
	13.4 Real estate	0	0	0
	13.5 Other invested assets	5,723,269	20,153,768	292,122,702
	13.6 Miscellaneous applications	5,247,975	118,700,851	96,313,334
	13.7 Total investments acquired (Lines 13.1 to 13.6)	890,775,786	917,148,143	5,289,741,073
14.	Net increase (or decrease) in contract loans and premium notes	(7,781,071)	(6,414,654)	(18,950,862)
15.	Net cash from investments (Line 12.8 minus Line 13.7 and Line 14)	(100,245,181)	185,122,605	(575,550,307)
	Cash from Financing and Miscellaneous Sources			
16.	Cash provided (applied):			
	16.1 Surplus notes, capital notes	0	0	0
	16.2 Capital and paid in surplus, less treasury stock	102,000,000	0	0
	16.3 Borrowed funds	0	0	0
	16.4 Net deposits on deposit-type contracts and other insurance liabilities	22,418,176	46,493,207	59,241,360
	16.5 Dividends to stockholders	0	221,000,000	221,000,000
	16.6 Other cash provided (applied)	3,826,142	(140,865,893)	(147,264,345)
17.	Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6)	128,244,318	(315,372,686)	(309,022,985)
	RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18.	Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	(38,549,222)	(455,648,108)	(726,632,747)
19.	Cash, cash equivalents and short-term investments:			
	19.1 Beginning of year	604,431,273	1,331,064,021	1,331,064,021
	19.2 End of period (Line 18 plus Line 19.1)	565,882,051	875,415,913	604,431,273

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

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	0	0	0
2.	Ordinary life insurance	278,396,195	257,499,762	1,029,786,873
3.	Ordinary individual annuities	158,088,516	147,967,879	647,811,890
4.	Credit life (group and individual)	0	0	0
5.	Group life insurance	118,189,293	127,526,372	505,675,535
6.	Group annuities	36,875,893	33,003,839	145,897,015
7.	A & H - group	160,893,496	158,512,440	623,697,550
8.	A & H - credit (group and individual)	0	0	0
9.	A & H - other	176,457	208,505	790,662
10.	Aggregate of all other lines of business	0	0	0
11.	Subtotal	752,619,850	724,718,797	2,953,659,525
12.	Deposit-type contracts	292,976	551,014	2,237,670
13.	Total	752,912,826	725,269,811	2,955,897,195
	DETAILS OF WRITE-INS			
1001.				
1002.				
1003.				
1098.	Summary of remaining write-ins for Line 10 from overflow page	0	0	0
1099.	Totals (Lines 1001 through 1003 plus 1098)(Line 10 above)	0	0	0

NOTES TO FINANCIAL STATEMENTS

Note 1 - Summary of Significant Accounting Policies

The financial statements of ReliaStar Life Insurance Company ("the Company") are presented on the basis of accounting practices prescribed or permitted by the Minnesota Department of Insurance.

The Minnesota Department of Insurance recognizes only statutory accounting practices prescribed or permitted by the State of Minnesota for determining and reporting the financial condition and results of operations of an insurance company and for determining its solvency under the Minnesota Insurance Law. The National Association of Insurance Commissioners' ("NAIC") Accounting Practices and Procedures manual has been adopted as a component of prescribed or permitted practices by the State of Minnesota. The Commissioner of the Minnesota Department of Insurance has the right to permit other specific practices that deviate from prescribed practices.

The Company made no changes to its accounting polices and practices as of March 31, 2011.

Certain amounts in the Company's statutory basis financial statements have been reclassified to conform to the 2011 financial statement presentation.

Note 2 - Accounting Changes and Corrections of Errors

None

Note 3 - Business Combinations and Goodwill

None

Note 4 - Discontinued Operations

None

Note 5 - Investments

D. Loan-Backed Securities

(1) Prepayment assumptions for loan-backed and structured securities are obtained from third party services, broker dealer survey values, or internal estimates.

(2) The following table discloses in aggregate the additional OTTI recognized by the Company in accordance with SSAP 43R, *Loan-backed and Structured Securities* as of March 31, 2011:

	Amortized Cost Basis Before OTTI	OTTI Recognized in Loss		Fair Value
		Interest	Non-interest	
First quarter:				
Intent to sell	$ 61,589,779	$ 7,424,889	$ -	$ 54,164,893
Inability or lack of intent to hold to recovery	17,080,940	3,447,222	-	13,633,718
Total first quarter	$ 78,670,719	$ 10,872,111	$ -	$ 67,798,611
Annual aggregate total	XXX	$ 10,872,111	$ -	XXX

NOTES TO FINANCIAL STATEMENTS

(3) The following tables disclose in detail the additional OTTI recognized by the Company in accordance with SSAP 43R as of March 31, 2011:

	Amortized Cost Basis Before OTTI	Present Value of Projected Cash Flows	Recognized OTTI	Amortized Cost After OTTI	Fair Value at Time of OTTI
First quarter:					
05948KK81	$ 145,480	$ 59,012	$ 86,468	$ 59,012	$ 150,919
05948KN70	1,758,154	1,720,939	37,216	1,720,939	1,359,975
12489WJS4	1,310,682	1,016,733	293,949	1,016,733	423,840
126670CM8	6,165,382	3,463,841	2,701,541	3,463,841	3,373,550
12667GTM5	1,011,780	994,074	17,706	994,074	807,700
161546FY7	1,067,426	556,792	510,635	556,792	283,805
17307GZK7	1,281,153	1,280,166	988	1,280,166	1,195,417
225458PN2	1,928,481	1,872,113	56,368	1,872,113	1,773,482
31398GNN5	2,788,603	2,035,684	752,920	2,035,684	3,641,630
76110H2X6	1,173,464	1,147,499	25,966	1,147,499	872,516
76110WTV8	2,465,480	736,762	1,728,718	736,762	736,762
86359DUT2	1,831,621	1,693,243	138,378	1,693,243	759,703
93934FGJ5	552,491	546,414	6,077	546,414	370,245
Total first quarter	$ 23,480,197	$ 17,123,272	$ 6,356,930	$17,123,272	$15,749,544

(4) The following table shows all impaired securities at March 31, 2011 in the aggregate for which an OTTI has not been recognized in earnings as a realized loss, including securities with a recognized OTTI for non-interest related declines when a non-recognized interest related impairment remains:

	Aggregate Amount of Unrealized Losses	Aggregate Fair Value of Securities with Unrealized Losses
Less than 12 months	$ 15,250,956	$ 188,754,825
Greater than 12 months	59,701,533	402,164,069
Total	$ 74,952,489	$ 590,918,894

(5) If the fair value of a loan-backed or structured security is less than its amortized cost basis at the balance sheet date, the Company determines whether the impairment is other-than-temporary. Amortized cost basis includes adjustments made to the cost of an investment for accretion, amortization, collection of cash and previous OTTI recognized as a realized loss.

The general categories of information that the Company considers in reaching the conclusion that an impairment is other-than-temporary are as follows:

Intent to Sell - if the Company intends to sell the loan-backed or structured security (that is, it has decided to sell the security), an OTTI is considered to have occurred.

Intent and Ability to Hold - if the Company does not intend to sell the loan-backed or structured security, the Company determines whether it has the intent and ability to retain the investment in the security for a period of time sufficient to recover the amortized cost basis. If the Company does not have the intent and ability to retain the investment for the time sufficient to recover the amortized cost basis, an OTTI shall be considered to have occurred.

Recovery of the Amortized Cost Basis - if the Company does not expect to recover the entire amortized cost basis of the security, the Company would be unable to assert that it will recover its amortized cost basis even if it does not intend to sell the security and the entity has the intent and ability to hold. Therefore, in those situations, an OTTI shall be considered to have occurred. In assessing whether the entire amortized cost basis of the security will be recovered, the Company compares the present value of cash flows expected to be collected from the security with the amortized cost basis of the security. If present value of cash flows expected to be collected is less than the amortized cost basis of the security, the entire amortized cost basis of the security will not be recovered (that is, a non-interest related decline exists), and an OTTI shall be considered to have occurred.

The Company conducts a thorough quarterly review of all loan-backed and structured security holdings to conclude if the amortized cost basis of those securities is recoverable. This review is documented at a detailed level and encompasses numerous factors and assumptions. The overall credit tracking process yields a variety of key data that supports the impairment decision making process. The review process and related assumptions are updated quarterly based on trends in the marketplace.

As part of the quarterly review, the Company identifies securities whose ratio of credit enhancement to serious delinquency does not exhibit ample protection against principal

NOTES TO FINANCIAL STATEMENTS

loss. Those securities are put through a more detailed analysis which covers, among other factors, (a.) an analysis of the underlying collateral characteristics; (b.) a review of the historical performance of the collateral in the deal; (c.) structural analysis of the security; and (d.) cash flow scenario analysis.

The retrospective adjustment method is used to determine the amortized cost for the majority of loan-backed and structured securities. For certain securities, the prospective adjustments methodology is utilized, including interest-only securities and securities that have experienced an OTTI.

The market values for loan-backed and structured securities are obtained as follows:

1. For securities that are considered marketable – market values are received from third party pricing services or by obtaining a bid price from brokerage firms engaged in the business of trading those securities.
2. For securities that were privately placed and for which no ready market exists - the Company establishes fair market values using a matrix pricing system which considers key factors such as credit quality, industry sector, size of the issuer and transaction structure. A limited portion of the private placement portfolio is priced independently of the matrix system as described above.

Note 6 - Joint Ventures, Partnerships and Limited Liability Companies

No significant change

Note 7 - Investment Income

No significant change

Note 8 - Derivative Instruments

No significant change

Note 9 - Income Taxes

D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate

The provision for federal income tax expense and change in deferred taxes differs from the amount which would be obtained by applying the statutory federal income tax rate to income (including capital items) before income taxes for the following reasons:

	March 31, 2011		December 31, 2010	
	Amount	Effective Tax Rate	Amount	Effective Tax Rate
Ordinary income (loss)	$ 65,647,104		$(118,105,256)	
Capital losses	(14,250,619)		(90,695,100)	
Total pretax income (loss)	51,396,485		(208,800,356)	
Expected tax expense (benefit) at 35% statutory rate	17,988,770	35.0%	(73,080,125)	35.0%
Increase (decrease) in actual tax reported resulting from:				
a. Dividends received deduction	(607,094)	-1.2%	(4,227,224)	2.0%
b. Interest maintenance reserve	289,334	0.6%	15,264,590	-7.3%
c. Reinsurance	(3,276,918)	-6.4%	128,994,900	-61.8%
d. Settlement of IRS audit	2,732,561	5.3%	(6,271,762)	3.0%
e. Return of capital	-	0.0%	-	0.0%
f. Tax credits	(4,083,351)	-7.9%	(15,454,719)	7.4%
g. Change in Valuaiton allowance	(14,467,345)	-28.1%	(51,971,318)	24.9%
h. Other	49,842	0.1%	(32,003)	0.0%
Total income tax reported	$ (1,374,201)	-2.7%	$ (6,777,661)	3.2%
Current income taxes incurred	$ 45,777,686	89.1%	$ 25,427,094	-12.2%
Change in deferred income tax*	(47,151,887)	-91.7%	(32,204,755)	15.4%
Total income tax reported	$ (1,374,201)	-2.7%	$ (6,777,661)	3.2%

* excluding tax on unrealized gains (losses) and other surplus items

In March 2011, the Internal Revenue Service ("IRS") completed its examination of the Company's return for tax year 2009. In first quarter of 2011, the Company increased its current tax expense and paid its indirect parent, ING America Insurance Holdings, Inc. ("ING AIH"), $52,494,904 ($28,144,522 net of unrecognized tax benefits) to record the 2009 Audit Settlement.

NOTES TO FINANCIAL STATEMENTS

Note 10 - Information Concerning Parent, Subsidiaries and Affiliates

D. At March 31, 2011 the Company reported $37,906,923 as amounts due to affiliated companies and $40,189,016 as amounts due from affiliated companies under cost sharing arrangements, services and investment management agreements with affiliated companies. The terms of the agreements require that these balances be settled within specified due dates. The Company recorded a nonadmitted asset charge to surplus of $770,758 for amounts due from affiliated companies that were not settled within 90 days or do not have written affiliated agreements on file under the guidance of SSAP 96, *Settlement Requirements for Intercompany Transactions.*

As of March 31, 2011, the Company had an outstanding receivable of $369,324,122 including principal plus interest, due from ING AIH, an affiliate, and no outstanding payable due to ING AIH, under a reciprocal loan agreement between the Company and ING AIH. The Company has reported the outstanding receivable on Schedule DA.

The Company received a $52,000,000 capital contribution from its parent Lion Connecticut Holdings ("Lion") on March 31, 2011.

With the permission of the Minnesota Department of Insurance, the Company received a capital contribution from Lion in the amount of $50,000,000 on February 16, 2011 that was reflected in the 2010 Annual Statement per SSAP No. 72, *Surplus and Quasi-reorganization.*

E. The Company, effective January 2002, entered in a Guarantee Agreement with two other ING affiliates whereby it is jointly and severally liable for $250,000,000 obligation of another ING affiliate, Security Life of Denver International Limited ("SLDI"). The Company's Board of Directors approved this transaction on April 25, 2002. The two affiliated life insurers were Security Connecticut Life Insurance Company ("SCL") (subsequently merged into the Company) and Security Life of Denver Insurance Company ("SLD"). The joint and several guarantees of the two remaining insurers are capped at $250,000,000. The State of Colorado and the State of Minnesota did not disapprove the guarantee agreement.

Due to the ratings downgrade by Moody's Inc, on October 27, 2009, the Company was contractually required to collateralize its guarantee obligation. Accordingly, on January 22, 2010 the Company provided a letter of credit from the Federal Home Loan Bank of Des Moines in support of this obligation and renewed the letter of credit on January 21, 2011. The Company pledged assets with a book value of $301,291,911 as of March 31, 2011 to the Federal Home Loan Bank of Des Moines as collateral for the letter of credit

Note 11 - Debt

No significant change

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

No significant change.

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

No significant change.

Note 14 - Contingencies

No significant change

Note 15 - Leases

No significant change

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

No significant change

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

No significant change

Note 18 - Gain or Loss to the Reporting Entity from Uninsured A&H Plans and the Uninsured Portion of Partially Insured Plans

No significant change

NOTES TO FINANCIAL STATEMENTS

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

No significant change

Note 20- Fair Value Measurements

A. Fair Value Measurements at Reporting Date

(1) The table below shows assets and liabilities measured and reported at fair value in which the fair value measurements use quoted prices in active markets for identical assets or liabilities (Level 1), significant other observable input (Level 2) and significant unobservable inputs (Level 3) as of March 31, 2011:

	Level 1	Level 2	Level 3	Total
Assets:				
Bonds				
US corporate, state & municipal	$ -	$ 9,071,918	$ -	$ 9,071,918
Foreign	-	6,000,001	110	6,000,111
Residential mortgage-backed	-	6,655,784	-	6,655,784
Commercial mortgage-backed	-	21,994,570	-	21,994,570
Preferred stock	-	5,640,000	2,548,098	8,188,098
Common stock	55,007,251	-	10,560,899	65,568,150
Cash, cash equivalents and short-term investments	565,882,051	-	-	565,882,051
Derivatives				
Call options	-	-	2,316,986	2,316,986
Forwards	1,808,380	-	-	1,808,380
Interest rate swaps	-	63,022,907	-	63,022,907
Separate account assets	2,243,472,631	67,519,490	-	2,310,992,121
Total assets	$2,866,170,313	$179,904,670	$ 15,426,093	$3,061,501,076
Liabilities:				
Derivatives				
CDS buy	$ -	$ 102,124	$ -	$ 102,124
Forwards	-	227,622	-	227,622
Interest rate swaps	-	75,234,167	24,406,000	99,640,167
Total liabilities	$ -	$ 75,563,913	$ 24,406,000	$ 99,969,913

There were no transfers between Level 1 and Level 2 during the three months ended March 31, 2011. The Company's policy is to recognize transfers in and transfers out as of the beginning of the reporting period.

(2) The table below summarizes the changes in fair value of the Company's assets and liabilities using significant unobservable inputs (Level 3) as of March 31, 2011:

	Bonds				Derivatives		
	RMBS/FX	ABS	Preferred Stock	Common Stock	Call Options	Interest Rate Swaps	Total
Beginning balance	$ 7,111,978	$2,393,700	$ 548,098	$10,844,387	$ 2,259,212	$(28,201,111)	$ (5,043,736)
Transfers into Level 3	-	-	2,000,000	-	-	-	2,000,000
Transfers out of Level 3	(7,111,868)	(2,393,700)	-	-	-	-	(9,505,568)
Total gains (losses) included in income	-	-	-	-	473,308	3,795,111	4,268,419
Total gains (losses) included in surplus	-	-	-	(283,488)	90,191	-	(193,297)
Purchases	-	-	-	-	419,268	-	419,268
Issues	-	-	-	-	(924,993)	-	(924,993)
Ending balance	$ 110	$ -	$2,548,098	$10,560,899	$ 2,316,986	$(24,406,000)	$ (8,979,907)

The transfers out of Level 3 during the three months ended March 31, 2011 in bonds, are primarily due to the Company's determination that the market for subprime RMBS securities has become sufficiently active. While the valuation methodology has not changed, the Company has concluded that frequency of transactions in the market for subprime RMBS securities constitute an active market and therefore are now classified as level 2.

The remaining transfers in and out of Level 3 for RMBS, ABS and preferred stock during the three months ended March 31, 2011 are due to the variation in inputs relied upon for valuation each quarter. Securities that are primarily valued using independent broker quotes when prices are not available from one of the commercial pricing services are reflected as transfers into Level 3, as these securities are generally less liquid with very limited trading activity or where less transparency exists corroborating the inputs to the valuation methodologies. When securities are valued using more

widely available information, the securities are transferred out of Level 3 and into Level 1 or 2, as appropriate.

(3) The fair value hierarchy gives the highest priority to quoted prices in active markets for identical assets or liabilities (Level 1) and the lowest priority to unobservable inputs (Level 3). If the inputs used to measure fair value fall within different levels of the hierarchy, the category level is based on the lowest priority level input that is significant to the fair value measurement of the instrument.

Financial assets and liabilities recorded at fair value on the balance sheet are categorized as follows:

- Level 1 - Unadjusted quoted prices for identical assets or liabilities in an active market

- Level 2 - Quoted prices in markets that are not active or inputs that are observable either directly or indirectly for substantially the full term of the asset or liability. Level 2 inputs include the following:

  - Quoted prices for similar assets or liabilities in active markets;
  - Quoted prices for identical or similar assets or liabilities in non- active markets;
  - Inputs other than quoted market prices that are observable; and
  - Inputs that are derived principally from or corroborated by observable market data through correlation or other means.

- Level 3 - Prices or valuation techniques that require inputs that are both unobservable and significant to the overall fair value measurement. These valuations, whether derived internally or obtained from a third party, use critical assumptions that are not widely available to estimate market participant expectations in valuing the asset or liability.

(4) Fair values are based on quoted market prices when available. When market prices are not available, fair value is generally estimated using discounted cash flow analyses, incorporating current market inputs for similar financial instruments with comparable terms and credit quality (matrix pricing). In instances where there is little or no market activity for the same or similar instruments, the Company estimates fair value using methods, models and assumptions that management believes market participants would use to determine a current transaction price. These valuation techniques involve some level of management estimation and judgment which becomes significant with increasingly complex instruments or pricing models. Where appropriate, adjustments are included to reflect the risk inherent in a particular methodology, model or input used.

(5) See Note 20A(1-4) for disclosures on derivative assets and liabilities.

B. Other Fair Value Disclosures
None

C. Reasons Not Practicable to Estimate Fair Value
None

Note 21 - Other Items

C. Other Disclosures

On October 26, 2009, ING announced the key components of the final Restructuring Plan ING submitted to the European Commission ("EC") as part of the process to receive EC approval for the state aid granted to ING by the State of the Netherlands (the "Dutch State") in the form of EUR 10 billion Core Tier 1 securities issued on November 12, 2008 and the full credit risk transfer to the Dutch State of 80% of ING's Alt-A residential mortgage-backed securities ("RMBS") on March 31, 2009 (the "ING-Dutch State Transaction"). As part of the Restructuring Plan, ING has agreed to separate its banking and insurance businesses by 2013. ING intends to achieve this separation by divestment of its insurance and investment management operations, including the Company. ING has announced that it will explore all options for implementing the separation including initial public offerings, sales or combinations thereof. In November 2009, the Restructuring Plan received formal EC approval and the separation of insurance and banking operations and other components of the Restructuring Plan were approved by ING shareholders. ING also reached an agreement with the Dutch State to alter the repayment terms of the Core Tier 1 securities in order to facilitate early repayment and ING repurchased in December 2009 EUR 5 billion of the total EUR 10 billion Core Tier 1 securities issued to the Dutch State. As part of the Restructuring Plan, ING also agreed to make additional payments to the Dutch State corresponding to an adjustment of fees for the Back-Up Facility. In total, these extra payments amounted to a net present value of EUR 1.3 billion, and were recorded by ING as a one-time pre-tax charge in the fourth quarter of 2009. The terms of the ING-Dutch State Transaction which closed on March 31, 2009, including the transfer price of the Alt-A RMBS securities, remained unaltered and the additional payments were not borne by the

Company or any other ING U.S. subsidiaries. In order to finance the repayment of EUR 5 billion Core Tier 1 securities and the associated costs as well as to mitigate the capital impact of the additional payments for the Back-Up Facility, ING launched a capital increase without preferential subscription rights for holders of (bearer depositary receipts for) ordinary shares of up to EUR 7.5 billion in November 2009. The rights issue was completed in December 2009. Proceeds of the issue in excess of the above amounts will be used to strengthen ING's capital position.

On January 28, 2010, ING announced the filing of its appeal with the General Court of the European Union against specific elements of the EC's decision regarding the ING Restructuring Plan. Despite the appeal, ING is committed to executing the formal separation of banking and insurance and the divestment of the latter as announced on October 26, 2009. In its appeal, ING contests the state aid calculation the EC applied to the reduction in repayment premium agreed upon by ING and the Dutch State in connection with ING's December 2009 repayment of the first EUR 5 billion of Core Tier 1 securities. ING is also appealing the disproportionality of the price leadership restrictions imposed on ING with respect to the European financial sector.

On November 10, 2010, ING announced that while the option of one global initial public offering ("IPO") remains open, ING and its U.S. insurance affiliates, including the Company, are going to prepare for a base case of two IPOs: one Europe-led IPO and one separate U.S.-focused IPO.

G. Subprime-Mortgage-Related Risk Exposure

The market for securities collateralized by subprime mortgages has been in a period of extended distress and uncertainty with regards to credit performance. Underlying collateral has continued to reflect the problems associated with a housing market that has seen substantial price declines and an employment market that has declined significantly and remained under stress. Credit spreads have widened meaningfully from issuance and rating agency downgrades have been widespread and severe within the sector. Over the course of 2009 and 2010, price transparency and liquidity for bonds backed by subprime mortgages have improved with reduced volatility across broader risk markets. In managing its risk exposure to subprime mortgages, ING takes into account collateral performance and structural characteristics associated with its various positions. It constructs various scenarios to project forward looking cashflows for each bond. ING's views are updated quarterly to ensure other than temporary impairments are properly recorded.

The Company does not have direct exposure through investments in subprime mortgage loans as of March 31, 2011.

The Company's direct exposure through other investments as of March 31, 2011:

	Actual Cost	Book/Adjusted Carrying Value*	Fair Value	OTTI Losses Recognized
a. Residential mortgage-backed securities	$ 113,906,131	$ 109,190,643	$ 106,476,165	$ 368,178
b. Commercial mortgage-backed securities	-	-	-	-
c. Collateralized debt obligations	-	-	-	-
d. Structured securities	160,487,902	160,691,671	153,490,908	12,883,222
e. Equity investment in SCAs**	25,219,702	25,027,087	5,665,528	2,038,247
f. Other assets	-	-	-	-
g. Total	$ 299,613,735	$ 294,909,401	$ 265,632,601	$ 15,289,647

* Excluding accrued interest

** The Company's subsidiaries, RNY and WWII, have direct exposure through other investments that comprise less than 1% of the Company's invested assets as of March 31, 2011. The Company's subsidiaries, RR, RRII and WWI, do not have direct exposure through other investments as of March 31, 2011.

The Company does not have underwriting exposure to subprime mortgage risk through Mortgage Guaranty or Financial Guaranty insurance coverage as of March 31, 2011.

Note 22 - Events Subsequent

Type I – Recognized Subsequent Events

The Company is not aware of any events occurring subsequent to March 31, 2011 that may have a material effect on the Company's financial statements. The Company evaluated events subsequent to March 31, 2011 through May 12, 2011, the date the statutory financial statements were available to be issued.

Type II – Nonrecognized Subsequent Events

The Company is not aware of any events occurring subsequent to March 31, 2011 that may have a material effect on the Company's financial statements. The Company evaluated events

NOTES TO FINANCIAL STATEMENTS

subsequent to March 31, 2011 through May 12, 2011, the date the statutory financial statements were available to be issued.

Note 23 - Reinsurance
No significant change

Note 24 - Retrospectively Rated Contracts & Contracts Subject to Redetermination
No significant change

Note 25 - Change in Incurred Losses and Loss Adjustment Expenses
Reserves as of December 31, 2010 were $334,607,889. As of March 31, 2011, $16,876,742 has been paid for incurred losses and loss adjustment expenses attributable to insured events of prior years. Reserves remaining for prior years are now $309,083,435 as a result of re-estimation of unpaid claims and claim adjustment expenses principally on disability, group life, stop loss and workers compensation carve out lines of insurance. Therefore, there has been a $8,647,712 favorable prior-year development since December 31, 2010. The decrease is generally the result of ongoing analysis of recent loss development trends. Original estimates are increased or decreased, as additional information becomes known regarding individual claims. Included in this decrease, the Company experienced $0 of favorable prior year loss development on retrospectively rated policies. However, the business to which it relates is subject to premium adjustments. Finally, including an increase of $614,905 of accumulated required interest on claim reserves results in a true favorable development of $9,262,617.

Note 26 - Intercompany Pooling Arrangements
None

Note 27 - Structured Settlements
None

Note 28 - Health Care Receivables
None

Note 29 - Participating Policies
No significant change

Note 30 - Premium Deficiency Reserves
None

Note 31 - Reserves for Life Contracts and Annuity Contracts
No significant change

Note 32 - Analysis of Annuity Actuarial Reserves and Deposit Liabilities by Withdrawal Characteristics
No significant change

Note 33 - Premiums and Annuity Considerations Deferred and Uncollected
No significant change

Note 34 - Separate Accounts
No significant change

Note 35 - Loss/Claim Adjustment Expenses
No significant change

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 [ ]

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. Have there been any substantial changes in the organizational chart since the prior quarter end? ..... Yes [ ] No [X]
If yes, complete the Schedule Y - Part 1 - organizational chart.

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 Name of Entity	2 NAIC Company Code	3 State of Domicile

5. If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved? ..... Yes [ ] No [X] N/A [ ]
If yes, attach an explanation.

6.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2009

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. 12/31/2004

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). 06/21/2006

6.4 By what department or departments?
Minnesota

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 [ ] No [ ] N/A [X]

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 Office of Thrift Supervision (OTS), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

1 Affiliate Name	2 Location (City, State)	3 FRB	4 OCC	5 OTS	6 FDIC	7 SEC
Clarion Capital, LLC	New York, NY	NO	NO	NO	NO	YES
Directed Services LLC	West Chester, PA	NO	NO	NO	NO	YES
ING Alternative Asset Management LLC	New York, NY	NO	NO	NO	NO	YES
ING America Equities, Inc.	Denver, CO	NO	NO	NO	NO	YES
ING Bank, fsb	Wilmington, DE	NO	NO	YES	NO	NO
ING Clarion Partners, LLC	New York, NY	NO	NO	NO	NO	YES
ING Clarion Real Estate Securities, L.P.	Radnor, PA	NO	NO	NO	NO	YES
ING Direct Funds Limited	Toronto, Ontario	NO	NO	NO	NO	YES
ING DIRECT Securities, Inc.	Wilmington, DE	NO	NO	NO	NO	YES
ING Financial Advisers, LLC	Windsor, CT	NO	NO	NO	NO	YES
ING Financial Markets LLC	New York, NY	NO	NO	NO	NO	YES
ING Financial Partners, Inc.	Des Moines, IA	NO	NO	NO	NO	YES
ING Investments Distributor, LLC	Scottsdale, AZ	NO	NO	NO	NO	YES
ING Realty Group LLC	New York, NY	NO	NO	NO	NO	YES
ING Investment Management Advisors B.V.	The Hague	NO	NO	NO	NO	YES
ING Investment Management Asia/Pacific (Hong Kong) LTD.	Hong Kong, China	NO	NO	NO	NO	YES
ING Investment Management Co.	New York, NY	NO	NO	NO	NO	YES
ING Investment Management LLC	Atlanta, GA	NO	NO	NO	NO	YES
ING Investment Management Services LLC	New York, NY	NO	NO	NO	NO	YES
ING Investments, LLC	Scottsdale, AZ	NO	NO	NO	NO	YES
ING Life Insurance and Annuity Company	Windsor, CT	NO	NO	NO	NO	YES
ING National Trust	Minneapolis, MN	NO	YES	NO	NO	NO
ING Private Wealth Management LLC	New York, NY	NO	NO	NO	NO	YES
ShareBuilder Securities Corporation	Bellevue, WA	NO	NO	NO	NO	YES
ShareBuilder Advisors, LLC	Bellevue, WA	NO	NO	NO	NO	YES
Systematized Benefits Administrators, Inc.	Windsor, CT	NO	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 [X] 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 [X]

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 [X]

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 [X] No [ ]

10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: ..... $ 0

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 [X] No [ ]

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

Investments in other pledged collateral $54,601,209.

12. Amount of real estate and mortgages held in other invested assets in Schedule BA: ..... $ 318,373

13. Amount of real estate and mortgages held in short-term investments: ..... $ 0

14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates? ..... Yes [X] 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	$ 18,486,400	$ 18,135,901
14.22	Preferred Stock	$ 0	$ 0
14.23	Common Stock	$ 320,196,137	$ 331,038,714
14.24	Short-Term Investments	$ 236,709,313	$ 369,317,529
14.25	Mortgage Loans on Real Estate	$ 0	$ 0
14.26	All Other	$ 330,869,943	$ 336,803,819
14.27	Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)	$ 906,261,793	$ 1,055,295,963
14.28	Total Investment in Parent included in Lines 14.21 to 14.26 above	$ 236,709,313	$ 369,317,529

15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB? ..... Yes [X] No [ ]

15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? ..... Yes [X] No [ ]

If no, attach a description with this statement.

GENERAL INTERROGATORIES

16. 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 [ ]

16.1 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
Bank of New York Mellon	One Wall Sreet, New York, NY 10286 .....

16.2 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)

16.3 Have there been any changes, including name changes, in the custodian(s) identified in 16.1 during the current quarter? ..... Yes [ ] No [X]

16.4 If yes, give full information relating thereto:

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

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

1 Central Registration Depository	2 Name(s)	3 Address
108934	ING Investment Management, LLC	5780 Powers Ferry Rd NW, Suite 300 Atlanta, GA 30327-4349 .....

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

17.2 If no, list exceptions:

19420WAA9
48632HAA5
524908UB4
86358RND5
X4338#AA3

GENERAL INTERROGATORIES

PART 2 - LIFE & HEALTH

			1 Amount
1.	Report the statement value of mortgage loans at the end of this reporting period for the following categories:		
	1.1 Long-Term Mortgages In Good Standing		
	1.11 Farm Mortgages	$	0
	1.12 Residential Mortgages	$	0
	1.13 Commercial Mortgages	$	1,963,076,357
	1.14 Total Mortgages in Good Standing	$	1,963,076,357
	1.2 Long-Term Mortgages In Good Standing with Restructured Terms		
	1.21 Total Mortgages in Good Standing with Restructured Terms	$	0
	1.3 Long-Term Mortgage Loans Upon which Interest is Overdue more than Three Months		
	1.31 Farm Mortgages	$	0
	1.32 Residential Mortgages	$	0
	1.33 Commercial Mortgages	$	0
	1.34 Total Mortgages with Interest Overdue more than Three Months	$	0
	1.4 Long-Term Mortgage Loans in Process of Foreclosure		
	1.41 Farm Mortgages	$	0
	1.42 Residential Mortgages	$	0
	1.43 Commercial Mortgages	$	0
	1.44 Total Mortgages in Process of Foreclosure	$	0
1.5	Total Mortgage Loans (Lines 1.14 + 1.21 + 1.34 + 1.44) (Page 2, Column 3, Lines 3.1 + 3.2)	$	1,963,076,357
1.6	Long-Term Mortgages Foreclosed, Properties Transferred to Real Estate in Current Quarter		
	1.61 Farm Mortgages	$	0
	1.62 Residential Mortgages	$	0
	1.63 Commercial Mortgages	$	0
	1.64 Total Mortgages Foreclosed and Transferred to Real Estate	$	0
2.	Operating Percentages:		
	2.1 A&H loss percent		31.900 %
	2.2 A&H cost containment percent		0.000 %
	2.3 A&H expense percent excluding cost containment expenses		109.400 %
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	$	0
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	$	0

SCHEDULE S - CEDED REINSURANCE

Showing All New Reinsurance Treaties - Current Year to Date

1 NAIC Company Code	2 Federal ID Number	3 Effective Date	4 Name of Reinsurer	5 Domiciliary Jurisdiction	6 Type of Reinsurance Ceded	7 Is Insurer Authorized? (Yes or No)

NONE

SCHEDULE T - PREMIUMS AND ANNUITY CONSIDERATIONS

Current Year To Date - Allocated by States and Territories

States, Etc.		1 Active Status	Direct Business Only					
			Life Contracts		4	5	6	7
			2 Life Insurance Premiums	3 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	4,450,353	262,420	371,126	0	5,083,900	0
2. Alaska	AK	L	850,936	1,949,767	2,419,565	0	5,220,267	0
3. Arizona	AZ	L	5,940,215	2,671,065	3,063,162	0	11,674,442	0
4. Arkansas	AR	L	2,537,205	1,089,195	705,071	0	4,331,472	64,237
5. California	CA	L	47,212,370	28,033,110	23,817,065	0	99,062,545	37,044
6. Colorado	CO	L	7,522,076	1,374,776	8,260,482	0	17,157,334	0
7. Connecticut	CT	L	9,114,909	356,329	2,370,700	0	11,841,937	0
8. Delaware	DE	L	2,887,142	96,052	237,006	0	3,220,200	0
9. District of Columbia	DC	L	893,970	127,278	365,461	0	1,386,709	0
10. Florida	FL	L	24,451,004	47,536,926	8,785,677	0	80,773,607	13,714
11. Georgia	GA	L	12,709,133	6,119,425	4,066,920	0	22,895,478	0
12. Hawaii	HI	L	1,307,333	2,658,968	81,758	0	4,048,058	0
13. Idaho	ID	L	1,774,718	540,752	743,873	0	3,059,343	0
14. Illinois	IL	L	17,168,661	5,093,378	6,555,677	0	28,817,716	154
15. Indiana	IN	L	5,497,545	2,441,582	2,394,855	0	10,333,983	0
16. Iowa	IA	L	6,256,468	728,643	1,371,785	0	8,356,896	0
17. Kansas	KS	L	3,406,180	921,469	1,185,725	0	5,513,374	0
18. Kentucky	KY	L	3,533,316	1,602,446	993,179	0	6,128,941	0
19. Louisiana	LA	L	3,928,171	2,053,680	1,327,627	0	7,309,477	0
20. Maine	ME	L	831,286	239,525	372,340	0	1,443,151	0
21. Maryland	MD	L	10,388,252	961,497	2,876,679	0	14,226,428	0
22. Massachusetts	MA	L	8,854,937	1,140,347	4,047,615	0	14,042,899	0
23. Michigan	MI	L	13,262,793	26,025,570	988,626	0	40,276,989	0
24. Minnesota	MN	L	22,844,092	2,689,542	6,219,097	0	31,752,732	28,566
25. Mississippi	MS	L	2,432,134	1,506,659	911,926	0	4,850,719	0
26. Missouri	MO	L	7,052,600	413,415	2,044,955	0	9,510,970	0
27. Montana	MT	L	2,970,110	1,290,603	698,414	0	4,959,127	0
28. Nebraska	NE	L	1,955,329	95,741	929,232	0	2,980,301	0
29. Nevada	NV	L	2,556,343	4,180,553	2,817,512	0	9,554,408	0
30. New Hampshire	NH	L	1,431,660	986,834	517,825	0	2,936,320	0
31. New Jersey	NJ	L	11,980,343	2,633,365	4,547,637	0	19,161,344	0
32. New Mexico	NM	L	1,809,571	2,573,053	1,255,904	0	5,638,527	0
33. New York	NY	0	5,962,789	20,059	1,800,767	0	7,783,615	0
34. North Carolina	NC	L	10,615,535	5,368,113	4,229,592	0	20,213,240	12,118
35. North Dakota	ND	L	1,251,235	232,863	258,787	0	1,742,885	0
36. Ohio	OH	L	10,999,882	7,319,915	2,573,267	0	20,893,064	30,000
37. Oklahoma	OK	L	3,393,531	1,359,566	1,491,372	0	6,244,469	0
38. Oregon	OR	L	3,154,458	450,451	1,756,597	0	5,361,506	0
39. Pennsylvania	PA	L	14,193,414	894,941	3,698,441	0	18,786,795	0
40. Rhode Island	RI	L	2,257,707	124,139	147,037	0	2,528,883	0
41. South Carolina	SC	L	5,201,134	2,120,259	1,829,792	0	9,151,184	0
42. South Dakota	SD	L	2,338,554	1,140,943	1,061,963	0	4,541,461	0
43. Tennessee	TN	L	6,442,247	1,533,682	1,957,613	0	9,933,542	0
44. Texas	TX	L	30,319,328	8,544,125	24,699,715	0	63,563,168	0
45. Utah	UT	L	5,624,920	1,193,813	765,582	0	7,584,316	0
46. Vermont	VT	L	402,307	13,685	202,433	0	618,425	0
47. Virginia	VA	L	10,505,740	8,585,564	1,777,217	0	20,868,521	54,916
48. Washington	WA	L	11,228,255	3,558,261	2,869,868	0	17,656,384	0
49. West Virginia	WV	L	850,424	1,241,201	471,655	0	2,563,280	52,227
50. Wisconsin	WI	L	7,827,331	511,123	7,558,960	0	15,897,414	0
51. Wyoming	WY	L	847,156	186,375	1,449,521	0	2,483,052	0
52. American Samoa	AS	N	874	0	0	0	874	0
53. Guam	GU	L	65,380	0	0	0	65,380	0
54. Puerto Rico	PR	L	776,529	1,450	0	0	777,979	0
55. U.S. Virgin Islands	VI	N	19,315	0	0	0	19,315	0
56. Northern Mariana Islands	MP	N	0	0	0	0	0	0
57. Canada	CN	N	246,251	0	843	0	247,094	0
58. Aggregate Other Aliens	OT	XXX	584,132	13,439	0	0	597,571	0
59. Subtotal		(a) 52	384,919,586	194,807,931	157,945,501	0	737,673,017	292,976
90. Reporting entity contributions for employee benefits plans		XXX	0	0	0	0	0	0
91. Dividends or refunds applied to purchase paid-up additions and annuities		XXX	2,139,931	0	0	0	2,139,931	0
92. Dividends or refunds applied to shorten endowment or premium paying period		XXX	0	0	0	0	0	0
93. Premium or annuity considerations waived under disability or other contract provisions		XXX	362,444	0	0	0	362,444	0
94. Aggregate or other amounts not allocable by State		XXX	0	0	0	0	0	0
95. Totals (Direct Business)		XXX	387,421,961	194,807,931	157,945,501	0	740,175,392	292,976
96. Plus Reinsurance Assumed		XXX	40,967,028	0	1,301,921	0	42,268,949	0
97 Totals (All Business)		XXX	428,388,989	194,807,931	159,247,422	0	782,444,341	292,976
98. Less Reinsurance Ceded		XXX	101,477,778	8,568	152,471,915	0	253,958,261	0
99. Totals (All Business) less Reinsurance Ceded		XXX	326,911,211	194,799,363	6,775,507	0	528,486,080	292,976
DETAILS OF WRITE-INS								
5801. Other alien		XXX	584,132	13,439	0	0	597,571	0
5802.		XXX						
5803.		XXX						
5898. Summary of remaining write-ins for Line 58 from overflow page		XXX	0	0	0	0	0	0
5899. Totals (Lines 5801 through 5803 plus 5898)(Line 58 above)		XXX	584,132	13,439	0	0	597,571	0
9401.		XXX						
9402.		XXX						
9403.		XXX						
9498. Summary of remaining write-ins for Line 94 from overflow page		XXX	0	0	0	0	0	0
9499. Totals (Lines 9401 through 9403 plus 9498)(Line 94 above)		XXX	0	0	0	0	0	0

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

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

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

NONE

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?	YES
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?	NO

Explanation:

1.

2.

3.

5.

6.

7.

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]

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]

7. Reasonableness and Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value) [Document Identifier 449]

OVERFLOW PAGE FOR WRITE-INS

Additional Write-ins for Liabilities Line 25

		1 Current Statement Date	2 December 31 Prior Year
2504.	Margin call collateral	9,485,000	10,595,000
2505.	Unclaimed property	7,861,919	7,654,338
2506.	Funds due to clients	11,782	11,782
2597.	Summary of remaining write-ins for Line 25 from overflow page	17,358,701	18,261,120

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	14,078,386	17,261,247
2.	Cost of acquired:		
	2.1 Actual cost at time of acquisition	0	0
	2.2 Additional investment made after acquisition	0	0
3.	Current year change in encumbrances	0	0
4.	Total gain (loss) on disposals	0	1,013,390
5.	Deduct amounts received on disposals	0	3,142,060
6.	Total foreign exchange change in book/adjusted carrying value	0	0
7.	Deduct current year's other than temporary impairment recognized	0	525,000
8.	Deduct current year's depreciation	130,407	529,191
9.	Book/adjusted carrying value at the end of current period (Lines 1+2+3+4-5+6-7-8)	13,947,979	14,078,386
10.	Deduct total nonadmitted amounts	0	0
11.	Statement value at end of current period (Line 9 minus Line 10)	13,947,979	14,078,386

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	1,965,481,216	2,225,989,203
2.	Cost of acquired:		
	2.1 Actual cost at time of acquisition	89,047,109	161,097,889
	2.2 Additional investment made after acquisition	0	180,843
3.	Capitalized deferred interest and other	0	0
4.	Accrual of discount	36,498	294,129
5.	Unrealized valuation increase (decrease)	0	0
6.	Total gain (loss) on disposals	0	1,096,306
7.	Deduct amounts received on disposals	91,433,178	417,055,726
8.	Deduct amortization of premium and mortgage interest points and commitment fees	55,288	461,334
9.	Total foreign exchange change in book value/recorded investment excluding accrued interest	0	0
10.	Deduct current year's other than temporary impairment recognized	0	5,660,094
11.	Book value/recorded investment excluding accrued interest at end of current period (Lines 1+2+3+4+5+6-7-8+9-10)	1,963,076,357	1,965,481,216
12.	Total valuation allowance	0	0
13.	Subtotal (Line 11 plus Line 12)	1,963,076,357	1,965,481,216
14.	Deduct total nonadmitted amounts	0	0
15.	Statement value at end of current period (Line 13 minus Line 14)	1,963,076,357	1,965,481,216

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	1,023,128,103	1,050,423,735
2.	Cost of acquired:		
	2.1 Actual cost at time of acquisition	0	14,071,711
	2.2 Additional investment made after acquisition	5,723,269	291,872,702
3.	Capitalized deferred interest and other	0	0
4.	Accrual of discount	31,271	123,573
5.	Unrealized valuation increase (decrease)	3,787,888	(93,884,801)
6.	Total gain (loss) on disposals	0	70,809
7.	Deduct amounts received on disposals	32,957,249	225,592,273
8.	Deduct amortization of premium and depreciation	775,593	4,261,060
9.	Total foreign exchange change in book/adjusted carrying value	0	0
10.	Deduct current year's other than temporary impairment recognized	0	9,696,293
11.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10)	998,937,689	1,023,128,103
12.	Deduct total nonadmitted amounts	12,730,309	93,964,390
13.	Statement value at end of current period (Line 11 minus Line 12)	986,207,380	929,163,713

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	12,900,745,030	12,354,594,869
2.	Cost of bonds and stocks acquired	790,757,429	4,740,026,305
3.	Accrual of discount	(17,900,901)	(64,448,447)
4.	Unrealized valuation increase (decrease)	25,703,473	10,904,438
5.	Total gain (loss) on disposals	(3,919,924)	114,188,808
6.	Deduct consideration for bonds and stocks disposed of	573,226,915	4,095,811,847
7.	Deduct amortization of premium	11,888,625	30,729,716
8.	Total foreign exchange change in book/adjusted carrying value	0	0
9.	Deduct current year's other than temporary impairment recognized	18,829,038	127,979,380
10.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	13,091,440,529	12,900,745,030
11.	Deduct total nonadmitted amounts	0	0
12.	Statement value at end of current period (Line 10 minus Line 11)	13,091,440,529	12,900,745,030

SCHEDULE D - PART 1B

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

		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
	BONDS								
1.	Class 1 (a)	7,624,298,536	798,439,334	1,090,236,034	(51,882,790)	7,280,619,046	0	0	7,624,298,536
2.	Class 2 (a)	4,228,101,558	489,739,300	117,361,582	18,162,581	4,618,641,857	0	0	4,228,101,558
3.	Class 3 (a)	614,018,932	47,824,756	11,496,741	5,791,150	656,138,097	0	0	614,018,932
4.	Class 4 (a)	152,087,132	2,381,251	14,837,632	(14,791,541)	124,839,210	0	0	152,087,132
5.	Class 5 (a)	79,742,597	1,457,498	8,999,853	(10,657,336)	61,542,906	0	0	79,742,597
6.	Class 6 (a)	23,979,427	0	446,840	18,815,374	42,347,961	0	0	23,979,427
7.	Total Bonds	12,722,228,182	1,339,842,139	1,243,378,682	(34,562,562)	12,784,129,077	0	0	12,722,228,182
	PREFERRED STOCK								
8.	Class 1	12,382,202	4,800,000	0	0	17,182,202	0	0	12,382,202
9.	Class 2	35,005,131	0	0	0	35,005,131	0	0	35,005,131
10.	Class 3	2,440,102	0	0	203,000	2,643,102	0	0	2,440,102
11.	Class 4	2,203,000	0	0	323,814	2,526,814	0	0	2,203,000
12.	Class 5	5,506,815	0	0	133,185	5,640,000	0	0	5,506,815
13.	Class 6	0	0	0	0	0	0	0	0
14.	Total Preferred Stock	57,537,250	4,800,000	0	659,999	62,997,249	0	0	57,537,250
15.	Total Bonds and Preferred Stock	12,779,765,432	1,344,642,139	1,243,378,682	(33,902,563)	12,847,126,326	0	0	12,779,765,432

(a) Book/Adjusted Carrying Value column for the end of the current reporting period includes the following amount of non-rated short-term and cash equivalent bonds by NAIC designation: NAIC 1 $ 0 ; NAIC 2 $ 0 ; NAIC 3 $ 0 ;
NAIC 4 $ 0 ; NAIC 5 $ 0 ; NAIC 6 $ 0

SCHEDULE DA - PART 1

Short-Term Investments

	1 Book/Adjusted Carrying Value	2 Par Value	3 Actual Cost	4 Interest Collected Year-to-Date	5 Paid for Accrued Interest Year-to-Date
9199999 Totals	521,610,188	XXX	521,561,103	66,319	230

SCHEDULE DA - VERIFICATION

Short-Term Investments

		1 Year To Date	2 Prior Year Ended December 31
1.	Book/adjusted carrying value, December 31 of prior year	500,537,884	1,226,372,412
2.	Cost of short-term investments acquired	3,851,417,138	21,074,091,735
3.	Accrual of discount	75,001	409,213
4.	Unrealized valuation increase (decrease)	0	0
5.	Total gain (loss) on disposals	(182,273)	(47)
6.	Deduct consideration received on disposals	3,830,237,553	21,800,335,392
7.	Deduct amortization of premium	9	37
8.	Total foreign exchange change in book/adjusted carrying value	0	0
9.	Deduct current year's other than temporary impairment recognized	0	0
10.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	521,610,188	500,537,884
11.	Deduct total nonadmitted amounts	0	0
12.	Statement value at end of current period (Line 10 minus Line 11)	521,610,188	500,537,884

SCHEDULE DB - PART A - VERIFICATION

Options, Caps, Floors, Collars, Swaps and Forwards

1.	Book/Adjusted Carrying Value, December 31, prior year (Line 9, prior year)	(34,937,613)
2.	Cost Paid/(Consideration Received) on additions	712,310
3.	Unrealized Valuation increase/(decrease)	2,017,358
4.	Total gain (loss) on termination recognized	(43,063)
5.	Considerations received/(paid) on terminations	882,282
6.	Amortization	578,136
7.	Adjustment to the Book/Adjusted Carrying Value of hedged item	0
8.	Total foreign exchange change in Book/Adjusted Carrying Value	0
9.	Book/Adjusted Carrying Value at End of Current Period (Lines 1+2+3+4-5+6+7+8)	(32,555,154)
10.	Deduct nonadmitted assets	0
11.	Statement value at end of current period (Line 9 minus Line 10)	(32,555,154)

SCHEDULE DB - PART B - VERIFICATION

Futures Contracts

1.	Book/Adjusted carrying value, December 31 of prior year		
2.	Net cash deposits (Section 1, Broker Name/Net Cash Deposits Footnote)		
3.1	Change in variation margin on open contracts		
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 16, current year to date minus		
	3.24 Section 1, Column 16, prior year		
3.3	Subtotal (Line 3.1 minus Line 3.2)		
4.1	Variation margin on terminated contracts during the year		
4.2	Less:		
	4.21 Amount used to adjust basis of hedged item		
	4.22 Amount recognized		
4.3	Subtotal (Line 4.1 minus Line 4.2)		
5.	Dispositions gains (losses) on contracts terminated in prior year:		
	5.1 Recognized		
	5.2 Used to adjust basis of hedged items		
6.	Book/Adjusted carrying value at end of current period (Lines 1+2+3.3-4.3-5.1-5.2)		
7.	Deduct total nonadmitted amounts		
8.	Statement value at end of current period (Line 6 minus Line 7)		

NONE

SCHEDULE DB - PART C - SECTION 1

Replication (Synthetic Asset) Transactions Open as of Current Statement Date

Replication (Synthetic Asset) Transactions								Components of the Replication (Synthetic Asset) Transactions							
								Derivative Instrument(s) Open			Cash Instrument(s) Held				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Number	Description	NAIC Designation or Other Description	Notional Amount	Book/Adjusted Carrying Value	Fair Value	Effective Date	Maturity Date	Description	Book/Adjusted Carrying Value	Fair Value	CUSIP	Description	NAIC Designation or Other Description	Book/Adjusted Carrying Value	Fair Value
44980*AA0	MANAGED SYNTHETIC CDO	1FE	15,000,000	15,900,000	12,619,137	08/24/2006	09/20/2013	CDS SELL	0	(3,280,863)	50180C-AF-7	LBUCMT_06-C7 AM	1Z*	15,900,000	15,900,000
44980*AA0	MANAGED SYNTHETIC CDO	2	4,000,000	4,262,360	2,895,334	08/24/2006	09/20/2013	CDS SELL	0	(1,367,026)	46628F-AF-8	JPMCC_06-LDP7 A4	1Z*	4,262,360	4,262,360
94106LE@4	WASTE MANAGEMENT INC	1	1,670,939	1,849,446	1,850,603	01/25/2007	03/20/2012	CDS SELL	0	1,157	97181#-KG-7	UNION PACIFIC CORP PRVT	1	1,849,446	1,849,446
CDS000373	CDXIG14 EX- FINANCIALS	1	25,000,000	11,856,759	11,961,590	07/07/2010	06/20/2015	CDS SELL	(20,741)	84,090	912803-BM-4	TREASURY STRIP (PRIN)	1	11,877,500	11,877,500
CDS000373	CDXIG14 EX- FINANCIALS	1	24,600,000	34,524,230	34,750,021	07/07/2010	06/20/2015	CDS SELL	(44,674)	181,117	912810-EK-0	TREASURY BOND	1	34,568,904	34,568,904
CDS000373	CDXIG14 EX- FINANCIALS	1	45,000,000	44,991,446	45,701,074	07/07/2010	06/20/2015	CDS SELL	(140,404)	569,224	912810-PX-0	TREASURY BOND	1	45,131,850	45,131,850
CDS000374	CDXIG14 EX-FINANCIALS	1	21,000,000	24,085,478	24,280,218	07/13/2010	06/20/2015	CDS SELL	63,998	258,738	912810-FP-8	TREASURY BOND	1	24,021,480	24,021,480
CDS000374	CDXIG14 EX-FINANCIALS	1	50,000,000	23,791,799	23,903,775	07/13/2010	06/20/2015	CDS SELL	36,799	148,775	912803-BM-4	TREASURY STRIP (PRIN)	1	23,755,000	23,755,000
CDS000374	CDXIG14 EX-FINANCIALS	1	30,000,000	37,160,197	37,442,571	07/13/2010	06/20/2015	CDS SELL	92,797	375,171	912810-FB-9	TREASURY BOND	1	37,067,400	37,067,400
CDS000373	CDXIG14 EX- FINANCIALS	1	50,000,000	50,001,310	50,735,130	07/07/2010	06/20/2015	CDS SELL	(145,190)	588,630	912810-PX-0	TREASURY BOND	1	50,146,500	50,146,500
CDS000373	CDXIG14 EX- FINANCIALS	1	25,000,000	24,999,857	25,370,799	07/07/2010	06/20/2015	CDS SELL	(73,393)	297,549	912810-PX-0	TREASURY BOND	1	25,073,250	25,073,250
CDS000373	CDXIG14 EX- FINANCIALS	1	21,000,000	20,999,306	21,313,800	07/07/2010	06/20/2015	CDS SELL	(62,224)	252,270	912810-PX-0	TREASURY BOND	1	21,061,530	21,061,530
CDS000373	CDXIG14 EX- FINANCIALS	1	11,800,000	11,894,955	12,007,850	07/07/2010	06/20/2015	CDS SELL	(22,337)	90,558	912810-FT-0	TREASURY BOND	1	11,917,292	11,917,292
CDS000373	CDXIG14 EX- FINANCIALS	1	10,000,000	4,741,427	4,789,811	07/07/2010	06/20/2015	CDS SELL	(9,573)	38,811	912803-BM-4	TREASURY STRIP (PRIN)	1	4,751,000	4,751,000
CDS000373	CDXIG14 EX- FINANCIALS	1	10,000,000	10,002,177	10,139,264	07/07/2010	06/20/2015	CDS SELL	(27,123)	109,964	912810-PX-0	TREASURY BOND	1	10,029,300	10,029,300
CDS000373	CDXIG14 EX- FINANCIALS	1	41,000,000	40,992,490	41,637,607	07/07/2010	06/20/2015	CDS SELL	(127,640)	517,477	912810-PX-0	TREASURY BOND	1	41,120,130	41,120,130
CDS000373	CDXIG14 EX- FINANCIALS	1	15,000,000	14,999,276	15,225,067	07/07/2010	06/20/2015	CDS SELL	(44,674)	181,117	912810-PX-0	TREASURY BOND	1	15,043,950	15,043,950
CDS000374	CDXIG14 EX-FINANCIALS	1	30,000,000	37,145,688	37,442,571	07/13/2010	06/20/2015	CDS SELL	78,288	375,171	912810-FB-9	TREASURY BOND	1	37,067,400	37,067,400
CDS000374	CDXIG14 EX-FINANCIALS	1FE	13,500,000	16,330,854	16,452,566	07/13/2010	06/20/2015	CDS SELL	39,999	161,711	31359M-EU-3	FNMA BENCHMARK NOTES	1FE	16,290,855	16,290,855
CDS000374	CDXIG14 EX-FINANCIALS	1	25,000,000	11,904,699	11,987,464	07/13/2010	06/20/2015	CDS SELL	27,199	109,964	912803-BM-4	TREASURY STRIP (PRIN)	1	11,877,500	11,877,500
CDS000374	CDXIG14 EX-FINANCIALS	1	15,000,000	18,565,699	18,663,069	07/13/2010	06/20/2015	CDS SELL	31,999	129,369	912810-FB-9	TREASURY BOND	1	18,533,700	18,533,700
CDS000374	CDXIG14 EX-FINANCIALS	1	15,000,000	15,087,149	15,218,598	07/13/2010	06/20/2015	CDS SELL	43,199	174,648	912810-PX-0	TREASURY BOND	1	15,043,950	15,043,950
CDS000374	CDXIG14 EX-FINANCIALS	1	21,000,000	20,718,968	20,913,708	07/13/2010	06/20/2015	CDS SELL	63,998	258,738	912810-PW-2	TREASURY BOND	1	20,654,970	20,654,970
CDS000374	CDXIG14 EX-FINANCIALS	1	10,000,000	9,619,499	9,707,132	07/13/2010	06/20/2015	CDS SELL	28,799	116,432	912810-QB-7	WI TREASURY BOND	1	9,590,700	9,590,700
CDS000374	CDXIG14 EX-FINANCIALS	1FE	21,000,000	25,335,818	25,530,558	07/13/2010	06/20/2015	CDS SELL	63,998	258,738	31359M-EB-5	FNMA	1FE	25,271,820	25,271,820
CDS000374	CDXIG14 EX-FINANCIALS	1	22,500,000	8,305,299	8,368,590	07/13/2010	06/20/2015	CDS SELL	20,799	84,090	912833-7R-5	TREASURY STRIP (INT)	1	8,284,500	8,284,500
CDS000374	CDXIG14 EX-FINANCIALS	2	4,000,000	4,293,200	4,317,542	07/13/2010	06/20/2015	CDS SELL	8,000	32,342	N4281@-BC-8	ROYAL VOPAK N.V. PRVT	2	4,285,200	4,285,200
CDS000374	CDXIG14 EX-FINANCIALS	2	5,000,000	5,375,807	5,414,748	07/13/2010	06/20/2015	CDS SELL	12,807	51,748	A6488#-AA-1	PORSCHE HOLDINGS GMBH PRVT	2	5,363,000	5,363,000
CDS000374	CDXIG14 EX-FINANCIALS	1	6,000,000	6,423,927	6,462,868	07/13/2010	06/20/2015	CDS SELL	12,807	51,748	69351U-AF-0	PPL CORP PRVT	1	6,411,120	6,411,120
CDS000374	CDXIG14 EX-FINANCIALS	2	25,567,500	29,484,745	29,728,170	07/13/2010	06/20/2015	CDS SELL	79,998	323,423	031100-A#-7	AMETEK INC PRVT	2	29,404,747	29,404,747
CDS000384	EMBARQ CORP	2	10,125,445	11,340,975	11,329,887	03/23/2011	06/20/2016	CDS SELL	68,317	57,229	62962@-AA-2	XCEL ENERGY INC PRVT	2	11,272,658	11,272,658
CDS000386	EMBARQ CORP	2	15,714,286	16,624,358	16,578,293	03/24/2011	06/20/2016	CDS SELL	117,601	71,536	G6177#-AA-1	INCHCAPE FINANCE PLC PRVT	2	16,506,757	16,506,757
CDS000386	EMBARQ CORP	2	16,000,000	16,411,584	16,375,949	03/24/2011	06/20/2016	CDS SELL	92,864	57,229	147528-E@-8	CASEYS GENERAL STORES INC. PRVT	2	16,318,720	16,318,720
9999999 - Totals				630,020,782	631,115,362	XXX	XXX	XXX	266,293	1,360,873	XXX	XXX	XXX	629,754,489	629,754,489

SCHEDULE DB - PART C - SECTION 2

Replication (Synthetic Asset) Transactions Open

	First Quarter		Second Quarter		Third Quarter		Fourth Quarter		Year To Date	
	1 Number of Positions	2 Total Replication (Synthetic Asset) Transactions Statement Value	3 Number of Positions	4 Total Replication (Synthetic Asset) Transactions Statement Value	5 Number of Positions	6 Total Replication (Synthetic Asset) Transactions Statement Value	7 Number of Positions	8 Total Replication (Synthetic Asset) Transactions Statement Value	9 Number of Positions	10 Total Replication (Synthetic Asset) Transactions Statement Value
1. Beginning Inventory	30	585,511,444	0	0	0	0	0	0	30	585,511,444
2. Add: Opened or Acquired Transactions	3	44,376,917	0	0	0	0	0	0	3	44,376,917
3. Add: Increases in Replication (Synthetic Asset) Transactions Statement Value	XXX	10,935,707	XXX	0	XXX	0	XXX	0	XXX	10,935,707
4. Less: Closed or Disposed of Transactions	0	0	0	0	0	0	0	0	0	0
5. Less: Positions Disposed of for Failing Effectiveness Criteria	0	0	0	0	0	0	0	0	0	0
6. Less: Decreases in Replication (Synthetic Asset) Transactions Statement Value	XXX	10,803,287	XXX	0	XXX	0	XXX	0	XXX	10,803,287
7. Ending Inventory	33	630,020,781	0	0	0	0	0	0	33	630,020,781

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	(32,555,154)	
2.	Part B, Section 1, Column 14	0	
3.	Total (Line 1 plus Line 2)		(32,555,154)
4.	Part D, Column 5	68,132,732	
5.	Part D, Column 6	(100,687,886)	
6.	Total (Line 3 minus Line 4 minus Line 5)		0

		Fair Value Check	
7.	Part A, Section 1, Column 16	(86,405,890)	
8.	Part B, Section 1, Column 13	0	
9.	Total (Line 7 plus Line 8)		(86,405,890)
10.	Part D, Column 8	81,623,581	
11.	Part D, Column 9	(168,029,471)	
12	Total (Line 9 minus Line 10 minus Line 11)		0

		Potential Exposure Check	
13.	Part A, Section 1, Column 21	557,506,175	
14.	Part B, Section 1, Column 19	0	
15.	Part D, Column 11	557,506,175	
16.	Total (Line 13 plus Line 14 minus Line 15)		0

SCHEDULE E - VERIFICATION

(Cash Equivalents)

		1 Year To Date	2 Prior Year Ended December 31
1.	Book/adjusted carrying value, December 31 of prior year	0	55,515,293
2.	Cost of cash equivalents acquired	0	1,069,099,307
3.	Accrual of discount	0	197,955
4.	Unrealized valuation increase (decrease)	0	0
5.	Total gain (loss) on disposals	0	264
6.	Deduct consideration received on disposals	0	1,124,812,819
7.	Deduct amortization of premium	0	0
8.	Total foreign exchange change in book/adjusted carrying value	0	0
9.	Deduct current year's other than temporary impairment recognized	0	0
10.	Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	0	0
11.	Deduct total nonadmitted amounts	0	0
12.	Statement value at end of current period (Line 10 minus Line 11)	0	0