



ANNUAL STATEMENT

For the Year Ended December 31, 2018
of the Condition and Affairs of the

IDS PROPERTY CASUALTY INSURANCE COMPANY

NAIC Group Code.....	4, 4	NAIC Company Code.....	29068	Employer's ID Number.....	39-1173498
	(Current Period) (Prior Period)				
Organized under the Laws of WI		State of Domicile or Port of Entry	WI	Country of Domicile	US
Incorporated/Organized.....	December 6, 1972	Commenced Business.....	January 24, 1973		
Statutory Home Office	3500 Packerland Drive .. De Pere .. WI .. US .. 54115-9070				
	<i>(Street and Number) (City or Town, State, Country and Zip Code)</i>				
Main Administrative Office	3500 Packerland Drive .. De Pere .. WI .. US .. 54115-9070			920-330-5100	
	<i>(Street and Number) (City or Town, State, Country and Zip Code)</i>			<i>(Area Code) (Telephone Number)</i>	
Mail Address	3500 Packerland Drive .. De Pere .. WI .. US .. 54115-9070				
	<i>(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)</i>				
Primary Location of Books and Records	3500 Packerland Drive .. De Pere .. WI .. US .. 54115-9070			920-330-5100	
	<i>(Street and Number) (City or Town, State, Country and Zip Code)</i>			<i>(Area Code) (Telephone Number)</i>	
Internet Web Site Address					
Statutory Statement Contact	Kelly B Kinas			920-330-5619	
	<i>(Name)</i>			<i>(Area Code) (Telephone Number)</i>	
	Kelly.Kinas@ampf.com			920-330-5603	
	<i>(E-Mail Address)</i>			<i>(Fax Number)</i>	

OFFICERS

Name	Title	Name	Title
1. Thomas Vincent Ealy	President	2. Thomas Richard Moore	Secretary
3. James Anthony Brefeld Jr	Treasurer		

OTHER

Thomas Scott Botsford	Sr Vice President	Lisa Kay Jossart	Sr Vice President
Christopher Francis Malone	Sr Vice President	John Joseph Whalin	Vice President
Richard Paul Yocius	Vice President		

DIRECTORS OR TRUSTEES

Thomas Scott Botsford	Thomas Vincent Ealy	Christopher Francis Malone	Joseph Edward Sweeney
Richard Paul Yocius	James Anthony Brefeld Jr	Brian Joseph McGrane	

State of..... Wisconsin
County of..... Brown

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC *Annual Statement Instructions and Accounting Practices and Procedures* manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

(Signature) Thomas V Ealy	(Signature) Kelly B Kinas	(Signature) Christopher F Malone
1. (Printed Name) President	2. (Printed Name) Asst Secretary	3. (Printed Name) Asst Treasurer
(Title)	(Title)	(Title)

Subscribed and sworn to before me
This 5th day of February 2019

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 _____

ASSETS

	Current Year			Prior Year
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
1. Bonds (Schedule D).....	1,558,901,019		1,558,901,019	1,573,511,367
2. Stocks (Schedule D):				
2.1 Preferred stocks.....			.0	
2.2 Common stocks.....	53,017,329	3,682,632	49,334,697	48,289,495
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens.....	36,116,877		36,116,877	29,888,908
3.2 Other than first liens.....			.0	
4. Real estate (Schedule A):				
4.1 Properties occupied by the company (less \$.....11,125,758 encumbrances).....	989,308		989,308	899,888
4.2 Properties held for the production of income (less \$.....0 encumbrances).....			.0	
4.3 Properties held for sale (less \$.....0 encumbrances).....			.0	
5. Cash (\$.....(47,711,269), Schedule E-Part 1), cash equivalents (\$.....53,085,091, Schedule E-Part 2) and short-term investments (\$.....0, Schedule DA).....	5,373,821		5,373,821	(18,758,354)
6. Contract loans (including \$.....0 premium notes).....			.0	
7. Derivatives (Schedule DB).....			.0	
8. Other invested assets (Schedule BA).....			.0	
9. Receivables for securities.....			.0	
10. Securities lending reinvested collateral assets (Schedule DL).....			.0	
11. Aggregate write-ins for invested assets.....	.0	.0	.0	.0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	1,654,398,354	3,682,632	1,650,715,722	1,633,831,304
13. Title plants less \$.....0 charged off (for Title insurers only).....			.0	
14. Investment income due and accrued.....	15,125,074		15,125,074	15,463,218
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	499,744		499,744	1,475,888
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$.....0 earned but unbilled premiums).....	78,670,858		78,670,858	89,167,149
15.3 Accrued retrospective premiums (\$.....0) and contracts subject to redetermination (\$.....0).....			.0	
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....	18,725,777		18,725,777	15,017,114
16.2 Funds held by or deposited with reinsured companies.....			.0	
16.3 Other amounts receivable under reinsurance contracts.....	346,104		346,104	270,000
17. Amounts receivable relating to uninsured plans.....			.0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....	5,104,124		5,104,124	8,848,666
18.2 Net deferred tax asset.....	21,002,392		21,002,392	19,714,382
19. Guaranty funds receivable or on deposit.....			.0	
20. Electronic data processing equipment and software.....	7,500,625	5,826,316	1,674,309	2,743,201
21. Furniture and equipment, including health care delivery assets (\$.....0).....	3,154,047	3,136,119	17,928	27,681
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			.0	
23. Receivables from parent, subsidiaries and affiliates.....	6,244,097		6,244,097	3,372,163
24. Health care (\$.....0) and other amounts receivable.....			.0	
25. Aggregate write-ins for other-than-invested assets.....	1,455,594	1,451,062	4,532	4,503
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25).....	1,812,226,791	14,096,129	1,798,130,662	1,789,935,270
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			.0	
28. TOTAL (Lines 26 and 27).....	1,812,226,791	14,096,129	1,798,130,662	1,789,935,270

DETAILS OF WRITE-INS

1101.....			.0	
1102.....			.0	
1103.....			.0	
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. Prepaid expenses.....	1,451,062	1,451,062	.0	
2502. Misc Receivable.....	4,532		4,532	4,503
2503.....			.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).....	1,455,594	1,451,062	4,532	4,503

IDS PROPERTY CASUALTY INSURANCE COMPANY

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Year	2 Prior Year
1. Losses (Part 2A, Line 35, Column 8).....	494,583,566	498,143,740
2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6).....		
3. Loss adjustment expenses (Part 2A, Line 35, Column 9).....	109,408,928	113,090,688
4. Commissions payable, contingent commissions and other similar charges.....		
5. Other expenses (excluding taxes, licenses and fees).....	32,351,521	27,652,292
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	4,618,052	6,466,810
7.1 Current federal and foreign income taxes (including \$.....(68,162) on realized capital gains (losses)).....	2,276,443	
7.2 Net deferred tax liability.....		
8. Borrowed money \$.....0 and interest thereon \$.....0.....		
9. Unearned premiums (Part 1A, Line 38, Column 5) (after deducting unearned premiums for ceded reinsurance of \$.....11,892,098 and including warranty reserves of \$.....0 and accrued accident and health experience rating refunds including \$.....0 for medical loss ratio rebate per the Public Health Service Act).....	337,858,587	322,181,380
10. Advance premium.....	7,081,080	7,442,458
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	8,193,917	22,113,359
13. Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 20).....		
14. Amounts withheld or retained by company for account of others.....	293,366	167,299
15. Remittances and items not allocated.....		
16. Provision for reinsurance (including \$.....0 certified) (Schedule F, Part 3, Column 78).....		
17. Net adjustments in assets and liabilities due to foreign exchange rates.....		
18. Drafts outstanding.....		
19. Payable to parent, subsidiaries and affiliates.....	9,841,959	9,924,947
20. Derivatives.....		
21. Payable for securities.....		
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$.....0 and interest thereon \$.....0.....		
25. Aggregate write-ins for liabilities.....	2,341,870	2,114,584
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	1,008,849,289	1,009,297,556
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	1,008,849,289	1,009,297,556
29. Aggregate write-ins for special surplus funds.....	0	0
30. Common capital stock.....	5,000,000	5,000,000
31. Preferred capital stock.....		
32. Aggregate write-ins for other-than-special surplus funds.....	0	0
33. Surplus notes.....		
34. Gross paid in and contributed surplus.....	630,839,908	630,839,908
35. Unassigned funds (surplus).....	153,441,465	144,797,806
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....		
36.20.000 shares preferred (value included in Line 31 \$.....0).....		
37. Surplus as regards policyholders (Lines 29 to 35, less 36) (Page 4, Line 39).....	789,281,373	780,637,714
38. TOTAL (Page 2, Line 28, Col. 3).....	1,798,130,662	1,789,935,270

DETAILS OF WRITE-INS

2501. Unclaimed Property and Other Misc Liabilities.....	2,341,870	2,114,584
2502.		
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	2,341,870	2,114,584
2901. Incremental DTA.....		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 through 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 through 3203 plus 3298) (Line 32 above).....	0	0

STATEMENT OF INCOME

	1 Current Year	2 Prior Year
UNDERWRITING INCOME		
1. Premiums earned (Part 1, Line 35, Column 4).....	1,042,385,913	993,344,234
DEDUCTIONS:		
2. Losses incurred (Part 2, Line 35, Column 7).....	793,061,581	786,715,296
3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1).....	126,870,474	129,524,970
4. Other underwriting expenses incurred (Part 3, Line 25, Column 2).....	181,556,240	169,720,362
5. Aggregate write-ins for underwriting deductions.....	0	0
6. Total underwriting deductions (Lines 2 through 5).....	1,101,488,295	1,085,960,628
7. Net income of protected cells.....		
8. Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7).....	(59,102,382)	(92,616,394)
INVESTMENT INCOME		
9. Net investment income earned (Exhibit of Net Investment Income, Line 17).....	58,507,682	57,898,003
10. Net realized capital gains (losses) less capital gains tax of \$....(68,162) (Exhibit of Capital Gains (Losses)).....	(256,423)	(191,336)
11. Net investment gain (loss) (Lines 9 + 10).....	58,251,259	57,706,667
OTHER INCOME		
12. Net gain (loss) from agents' or premium balances charged off (amount recovered \$....116,980 amount charged off \$....2,345,286).....	(2,228,306)	(2,248,897)
13. Finance and service charges not included in premiums.....	4,429,868	4,537,038
14. Aggregate write-ins for miscellaneous income.....	385,522	306,573
15. Total other income (Lines 12 through 14).....	2,587,084	2,594,714
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	1,735,961	(32,315,013)
17. Dividends to policyholders.....		
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17).....	1,735,961	(32,315,013)
19. Federal and foreign income taxes incurred.....	(7,145,158)	(22,603,533)
20. Net income (Line 18 minus Line 19) (to Line 22).....	8,881,119	(9,711,480)
CAPITAL AND SURPLUS ACCOUNT		
21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2).....	780,637,714	800,320,941
22. Net income (from Line 20).....	8,881,119	(9,711,480)
23. Net transfers (to) from Protected Cell accounts.....		
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$....(31,877).....	2,614,366	2,569,279
25. Change in net unrealized foreign exchange capital gain (loss).....		
26. Change in net deferred income tax.....	(693,777)	(13,855,415)
27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Column 3).....	(29,788)	1,314,390
28. Change in provision for reinsurance (Page 3, Line 16, Column 2 minus Column 1).....		
29. Change in surplus notes.....		
30. Surplus (contributed to) withdrawn from Protected Cells.....		
31. Cumulative effect of changes in accounting principles.....		
32. Capital changes:		
32.1 Paid in.....		
32.2 Transferred from surplus (Stock Dividend).....		
32.3 Transferred to surplus.....		
33. Surplus adjustments:		
33.1 Paid in.....	0	
33.2 Transferred to capital (Stock Dividend).....		
33.3. Transferred from capital.....		
34. Net remittances from or (to) Home Office.....		
35. Dividends to stockholders.....		
36. Change in treasury stock (Page 3, Lines 36.1 and 36.2, Column 2 minus Column 1).....		
37. Aggregate write-ins for gains and losses in surplus.....	(2,128,261)	0
38. Change in surplus as regards policyholders for the year (Lines 22 through 37).....	8,643,659	(19,683,226)
39. Surplus as regards policyholders, December 31 current year (Line 21 plus Line 38) (Page 3, Line 37).....	789,281,373	780,637,714
DETAILS OF WRITE-INS		
0501.		
0502.		
0503.		
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0
0599. Totals (Lines 0501 through 0503 plus 0598) (Line 5 above).....	0	0
1401. Miscellaneous Income.....	385,522	306,573
1402.		
1403.		
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0
1499. Totals (Lines 1401 through 1403 plus 1498) (Line 14 above).....	385,522	306,573
3701. Prior Year Premium Adj.....	(2,128,261)	
3702.		
3703.		
3798. Summary of remaining write-ins for Line 37 from overflow page.....	0	0
3799. Totals (Lines 3701 through 3703 plus 3798) (Line 37 above).....	(2,128,261)	0

CASH FLOW

	1 Current Year	2 Prior Year
CASH FROM OPERATIONS		
1. Premiums collected net of reinsurance.....	1,055,255,978	978,047,842
2. Net investment income.....	66,159,478	65,850,669
3. Miscellaneous income.....	2,587,084	2,594,714
4. Total (Lines 1 through 3).....	1,124,002,540	1,046,493,225
5. Benefit and loss related payments.....	800,406,521	810,134,284
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....		
7. Commissions, expenses paid and aggregate write-ins for deductions.....	304,023,362	282,278,889
8. Dividends paid to policyholders.....		
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....	(13,234,305)	(5,770,988)
10. Total (Lines 5 through 9).....	1,091,195,578	1,086,642,185
11. Net cash from operations (Line 4 minus Line 10).....	32,806,962	(40,148,960)
CASH FROM INVESTMENTS		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds.....	159,098,641	208,379,704
12.2 Stocks.....		
12.3 Mortgage loans.....	1,492,030	1,002,251
12.4 Real estate.....		
12.5 Other invested assets.....		
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....	4	669
12.7 Miscellaneous proceeds.....		
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	160,590,675	209,382,624
13. Cost of investments acquired (long-term only):		
13.1 Bonds.....	151,576,394	201,759,802
13.2 Stocks.....		
13.3 Mortgage loans.....	7,720,000	9,450,000
13.4 Real estate.....	791,355	2,558,015
13.5 Other invested assets.....		
13.6 Miscellaneous applications.....		1,019,709
13.7 Total investments acquired (Lines 13.1 to 13.6).....	160,087,749	214,787,526
14. Net increase (decrease) in contract loans and premium notes.....		
15. Net cash from investments (Line 12.8 minus Lines 13.7 minus Line 14).....	502,926	(5,404,902)
CASH FROM FINANCING AND MISCELLANEOUS SOURCES		
16. Cash provided (applied):		
16.1 Surplus notes, capital notes.....		
16.2 Capital and paid in surplus, less treasury stock.....	0	
16.3 Borrowed funds.....		
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....		
16.5 Dividends to stockholders.....		
16.6 Other cash provided (applied).....	(9,177,714)	1,548,522
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6).....	(9,177,714)	1,548,522
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).....	24,132,175	(44,005,341)
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year.....	(18,758,353)	25,246,988
19.2 End of year (Line 18 plus Line 19.1).....	5,373,822	(18,758,353)

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

20.0001		
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**IDS PROPERTY CASUALTY INSURANCE COMPANY
UNDERWRITING AND INVESTMENT EXHIBIT**

PART 1 - PREMIUMS EARNED

Line of Business	1 Net Premiums Written per Column 6, Part 1B	2 Unearned Premiums December 31 Prior Year- per Col. 3, Last Year's Part 1	3 Unearned Premiums December 31 Current Year- per Col. 5, Part 1A	4 Premiums Earned During Year (Cols. 1 + 2 - 3)
1. Fire.....	0		0	0
2. Allied lines.....	0		0	0
3. Farmowners multiple peril.....	0		0	0
4. Homeowners multiple peril.....	239,463,110	131,960,195	134,535,775	236,887,530
5. Commercial multiple peril.....	0		0	0
6. Mortgage guaranty.....	0		0	0
8. Ocean marine.....	0		0	0
9. Inland marine.....	0		0	0
10. Financial guaranty.....	0		0	0
11.1 Medical professional liability - occurrence.....	0		0	0
11.2 Medical professional liability - claims-made.....	0		0	0
12. Earthquake.....	0		0	0
13. Group accident and health.....	0		0	0
14. Credit accident and health (group and individual).....	0		0	0
15. Other accident and health.....	0		0	0
16. Workers' compensation.....	0		0	0
17.1 Other liability - occurrence.....	913,891	27,192	451,546	489,537
17.2 Other liability - claims-made.....	0		0	0
17.3 Excess workers' compensation.....	0		0	0
18.1 Products liability - occurrence.....	0		0	0
18.2 Products liability - claims-made.....	0		0	0
19.1, 19.2 Private passenger auto liability.....	478,212,922	110,734,631	117,781,454	471,166,099
19.3, 19.4 Commercial auto liability.....	0		0	0
21. Auto physical damage.....	339,473,197	79,459,362	85,089,812	333,842,747
22. Aircraft (all perils).....	0		0	0
23. Fidelity.....	0		0	0
24. Surety.....	0		0	0
26. Burglary and theft.....	0		0	0
27. Boiler and machinery.....	0		0	0
28. Credit.....	0		0	0
29. International.....	0		0	0
30. Warranty.....	0		0	0
31. Reinsurance - nonproportional assumed property.....	0		0	0
32. Reinsurance - nonproportional assumed liability.....	0		0	0
33. Reinsurance - nonproportional assumed financial lines.....	0		0	0
34. Aggregate write-ins for other lines of business.....	0	0	0	0
35. TOTALS.....	1,058,063,120	322,181,380	337,858,587	1,042,385,913

DETAILS OF WRITE-INS

3401.	0		0	0
3402.	0		0	0
3403.	0		0	0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	0	0	0	0

**IDS PROPERTY CASUALTY INSURANCE COMPANY
UNDERWRITING AND INVESTMENT EXHIBIT**

PART 1A - RECAPITULATION OF ALL PREMIUMS

Line of Business		1	2	3	4	5
		Amount Unearned (Running One Year or Less from Date of Policy) (a)	Amount Unearned (Running More Than One Year from Date of Policy) (a)	Earned But Unbilled Premium	Reserve for Rate Credits and Retrospective Adjustments Based on Experience	Total Reserve for Unearned Premiums Cols. 1 + 2 + 3 + 4
1.	Fire.....				0
2.	Allied lines.....				0
3.	Farmowners multiple peril.....				0
4.	Homeowners multiple peril.....	134,535,775				134,535,775
5.	Commercial multiple peril.....				0
6.	Mortgage guaranty.....				0
8.	Ocean marine.....				0
9.	Inland marine.....				0
10.	Financial guaranty.....				0
11.1	Medical professional liability - occurrence.....				0
11.2	Medical professional liability - claims-made.....				0
12.	Earthquake.....				0
13.	Group accident and health.....				0
14.	Credit accident and health (group and individual).....				0
15.	Other accident and health.....				0
16.	Workers' compensation.....				0
17.1	Other liability - occurrence.....	451,546				451,546
17.2	Other liability - claims-made.....				0
17.3	Excess workers' compensation.....				0
18.1	Products liability - occurrence.....				0
18.2	Products liability - claims-made.....				0
19.1, 19.2	Private passenger auto liability.....	117,781,454				117,781,454
19.3, 19.4	Commercial auto liability.....				0
21.	Auto physical damage.....	85,089,812				85,089,812
22.	Aircraft (all perils).....				0
23.	Fidelity.....				0
24.	Surety.....				0
26.	Burglary and theft.....				0
27.	Boiler and machinery.....				0
28.	Credit.....				0
29.	International.....				0
30.	Warranty.....				0
31.	Reinsurance - nonproportional assumed property.....				0
32.	Reinsurance - nonproportional assumed liability.....				0
33.	Reinsurance - nonproportional assumed financial lines.....				0
34.	Aggregate write-ins for other lines of business.....	0	0	0	0	0
35.	TOTALS.....	337,858,587	0	0	0	337,858,587
36.	Accrued retrospective premiums based on experience.....				0
37.	Earned but unbilled premiums.....				0
38.	Balance (sum of Lines 35 through 37).....					337,858,587

DETAILS OF WRITE-INS

3401.0
3402.0
3403.0
3498.	Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0
3499.	Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	0	0	0	0	0

(a) State here basis of computation used in each case:

**IDS PROPERTY CASUALTY INSURANCE COMPANY
UNDERWRITING AND INVESTMENT EXHIBIT**

PART 1B - PREMIUMS WRITTEN

Line of Business	1	Reinsurance Assumed		Reinsurance Ceded		6 Net Premiums Written (Cols. 1 + 2 + 3 - 4 - 5)
	Direct Business (a)	2 From Affiliates	3 From Non-Affiliates	4 To Affiliates	5 To Non-Affiliates	
1. Fire.....						.0
2. Allied lines.....						.0
3. Farmowners multiple peril.....						.0
4. Homeowners multiple peril.....	280,306,262	513,729			41,356,881	239,463,110
5. Commercial multiple peril.....						.0
6. Mortgage guaranty.....						.0
8. Ocean marine.....						.0
9. Inland marine.....						.0
10. Financial guaranty.....						.0
11.1 Medical professional liability - occurrence.....						.0
11.2 Medical professional liability - claims-made.....						.0
12. Earthquake.....						.0
13. Group accident and health.....						.0
14. Credit accident and health (group and individual).....						.0
15. Other accident and health.....						.0
16. Workers' compensation.....						.0
17.1 Other liability - occurrence.....	9,138,913				8,225,022	913,891
17.2 Other liability - claims-made.....						.0
17.3 Excess workers' compensation.....						.0
18.1 Products liability - occurrence.....						.0
18.2 Products liability - claims-made.....						.0
19.1, 19.2 Private passenger auto liability.....	458,326,654	22,013,002			2,126,734	478,212,922
19.3, 19.4 Commercial auto liability.....						.0
21. Auto physical damage.....	331,175,814	11,257,841			2,960,458	339,473,197
22. Aircraft (all perils).....						.0
23. Fidelity.....						.0
24. Surety.....						.0
26. Burglary and theft.....						.0
27. Boiler and machinery.....						.0
28. Credit.....						.0
29. International.....						.0
30. Warranty.....						.0
31. Reinsurance - nonproportional assumed property.....	XXX					.0
32. Reinsurance - nonproportional assumed liability.....	XXX					.0
33. Reinsurance - nonproportional assumed financial lines.....	XXX					.0
34. Aggregate write-ins for other lines of business.....	.0	.0	.0	.0	.0	.0
35. TOTALS.....	1,078,947,643	33,784,572	.0	.0	54,669,095	1,058,063,120

DETAILS OF WRITE-INS

3401.0
3402.0
3403.0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	.0	.0	.0	.0	.0	.0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	.0	.0	.0	.0	.0	.0

(a) Does the company's direct premiums written include premiums recorded on an installment basis? Yes [] No [X]

If yes: 1. The amount of such installment premiums \$.....0.

2. Amount at which such installment premiums would have been reported had they been recorded on an annualized basis \$....NO.

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2 - LOSSES PAID AND INCURRED

Line of Business	Losses Paid Less Salvage				5 Net Losses Unpaid Current Year (Part 2A, Col. 8)	6 Net Losses Unpaid Prior Year	7 Losses Incurred Current Year (Cols. 4 + 5 - 6)	8 Percentage of Losses Incurred (Col. 7, Part 2) to Premiums Earned (Col. 4, Part 1)
	1 Direct Business	2 Reinsurance Assumed	3 Reinsurance Recovered	4 Net Payments (Cols. 1 + 2 - 3)				
1. Fire.....				.0	.0		.0	0.0
2. Allied lines.....				.0	.0		.0	0.0
3. Farmowners multiple peril.....				.0	.0		.0	0.0
4. Homeowners multiple peril.....	283,539,647	105,410	73,537,451	210,107,606	61,573,884	71,982,303	199,699,187	84.3
5. Commercial multiple peril.....				.0	.0		.0	0.0
6. Mortgage guaranty.....				.0	.0		.0	0.0
8. Ocean marine.....				.0	.0		.0	0.0
9. Inland marine.....	6,527			6,527	.0		6,527	0.0
10. Financial guaranty.....				.0	.0		.0	0.0
11.1 Medical professional liability - occurrence.....				.0	.0		.0	0.0
11.2 Medical professional liability - claims-made.....				.0	.0		.0	0.0
12. Earthquake.....				.0	.0		.0	0.0
13. Group accident and health.....				.0	.0		.0	0.0
14. Credit accident and health (group and individual).....				.0	.0		.0	0.0
15. Other accident and health.....				.0	.0		.0	0.0
16. Workers' compensation.....				.0	.0		.0	0.0
17.1 Other liability - occurrence.....	5,053,067		4,233,209	819,858	775,150	545,300	1,049,708	214.4
17.2 Other liability - claims-made.....				.0	.0		.0	0.0
17.3 Excess workers' compensation.....				.0	.0		.0	0.0
18.1 Products liability - occurrence.....				.0	.0		.0	0.0
18.2 Products liability - claims-made.....				.0	.0		.0	0.0
19.1, 19.2 Private passenger auto liability.....	335,578,793	19,234,913	4,962,777	349,850,929	420,811,275	424,556,636	346,105,568	73.5
19.3, 19.4 Commercial auto liability.....				.0	.0		.0	0.0
21. Auto physical damage.....	228,026,286	8,343,015	532,469	235,836,832	11,423,257	1,059,502	246,200,587	73.7
22. Aircraft (all perils).....				.0	.0		.0	0.0
23. Fidelity.....				.0	.0		.0	0.0
24. Surety.....				.0	.0		.0	0.0
26. Burglary and theft.....				.0	.0		.0	0.0
27. Boiler and machinery.....				.0	.0		.0	0.0
28. Credit.....				.0	.0		.0	0.0
29. International.....				.0	.0		.0	0.0
30. Warranty.....				.0	.0		.0	0.0
31. Reinsurance - nonproportional assumed property.....	.XXX			.0	.0		.0	0.0
32. Reinsurance - nonproportional assumed liability.....	.XXX			.0	.0		.0	0.0
33. Reinsurance - nonproportional assumed financial lines.....	.XXX			.0	.0		.0	0.0
34. Aggregate write-ins for other lines of business.....	.0	.0	.0	.0	.0	.0	.0	0.0
35. TOTALS.....	852,204,320	27,683,338	83,265,906	796,621,752	494,583,566	498,143,741	793,061,577	76.1

DETAILS OF WRITE-INS

3401.0	.0		.0	0.0
3402.0	.0		.0	0.0
3403.0	.0		.0	0.0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	.0	.0	.0	.0	.0	.0	.0	.XXX
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	.0	.0	.0	.0	.0	.0	.0	0.0

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2A - UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

Line of Business	Reported Losses				Incurred But Not Reported			8 Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	9 Net Unpaid Loss Adjustment Expenses
	1 Direct	2 Reinsurance Assumed	3 Deduct Reinsurance Recoverable	4 Net Losses Excluding Incurred but not Reported (Cols. 1 + 2 - 3)	5 Direct	6 Reinsurance Assumed	7 Reinsurance Ceded		
1. Fire.....				0				0	
2. Allied lines.....				0				0	
3. Farmowners multiple peril.....				0				0	
4. Homeowners multiple peril.....	54,313,071	58,000	27,379,868	26,991,203	46,585,612	4,953	12,007,884	61,573,884	11,558,355
5. Commercial multiple peril.....				0				0	
6. Mortgage guaranty.....				0				0	
8. Ocean marine.....				0				0	
9. Inland marine.....				0				0	
10. Financial guaranty.....				0				0	
11.1 Medical professional liability - occurrence.....				0				0	
11.2 Medical professional liability - claims-made.....				0				0	
12. Earthquake.....				0				0	
13. Group accident and health.....				0				(a) 0	
14. Credit accident and health (group and individual).....				0				0	
15. Other accident and health.....				0				(a) 0	
16. Workers' compensation.....				0				0	
17.1 Other liability - occurrence.....	5,751,500		4,976,350	775,150				775,150	
17.2 Other liability - claims-made.....				0				0	
17.3 Excess workers' compensation.....				0				0	
18.1 Products liability - occurrence.....				0				0	
18.2 Products liability - claims-made.....				0				0	
19.1, 19.2 Private passenger auto liability.....	223,712,619	37,264,989	39,765,407	221,212,201	210,601,266	12,183,132	23,185,324	420,811,275	92,841,847
19.3, 19.4 Commercial auto liability.....				0				0	
21. Auto physical damage.....	8,892,088	292,866	174,754	9,010,200	2,890,711	(61,379)	416,275	11,423,257	5,008,726
22. Aircraft (all perils).....				0				0	
23. Fidelity.....				0				0	
24. Surety.....				0				0	
26. Burglary and theft.....				0				0	
27. Boiler and machinery.....				0				0	
28. Credit.....				0				0	
29. International.....				0				0	
30. Warranty.....				0				0	
31. Reinsurance - nonproportional assumed property.....	XXX			0	XXX			0	
32. Reinsurance - nonproportional assumed liability.....	XXX			0	XXX			0	
33. Reinsurance - nonproportional assumed financial lines.....	XXX			0	XXX			0	
34. Aggregate write-ins for other lines of business.....	0	0	0	0	0	0	0	0	0
35. TOTALS.....	292,669,278	37,615,855	72,296,379	257,988,754	260,077,589	12,126,706	35,609,483	494,583,566	109,408,928
DETAILS OF WRITE-INS									
3401.				0				0	
3402.				0				0	
3403.				0				0	
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	0	0	0	0	0	0	0	0	0

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

IDS PROPERTY CASUALTY INSURANCE COMPANY UNDERWRITING AND INVESTMENT EXHIBIT

PART 3 - EXPENSES

	1 Loss Adjustment Expenses	2 Other Underwriting Expenses	3 Investment Expenses	4 Total
1. Claim adjustment services:				
1.1 Direct.....	31,830,240			31,830,240
1.2 Reinsurance assumed.....	7,033,335			7,033,335
1.3 Reinsurance ceded.....	3,673,294			3,673,294
1.4 Net claim adjustment services (1.1 + 1.2 - 1.3).....	35,190,280	0	0	35,190,280
2. Commission and brokerage:				
2.1 Direct, excluding contingent.....		14,823,059		14,823,059
2.2 Reinsurance assumed, excluding contingent.....		6,081,223		6,081,223
2.3 Reinsurance ceded, excluding contingent.....		13,536,536		13,536,536
2.4 Contingent - direct.....		6,071,563		6,071,563
2.5 Contingent - reinsurance assumed.....				0
2.6 Contingent - reinsurance ceded.....				0
2.7 Policy and membership fees.....				0
2.8 Net commission and brokerage (2.1 + 2.2 - 2.3 + 2.4 + 2.5 - 2.6 + 2.7).....	0	13,439,310	0	13,439,310
3. Allowances to manager and agents.....				0
4. Advertising.....		5,515,481	533	5,516,013
5. Boards, bureaus and associations.....	797,541	6,084,305	168	6,882,014
6. Surveys and underwriting reports.....	531,889	5,880,544		6,412,432
7. Audit of assureds' records.....				0
8. Salary and related items:				
8.1 Salaries.....	58,243,540	73,764,491	298,145	132,306,176
8.2 Payroll taxes.....	4,490,365	5,112,569	9,873	9,612,807
9. Employee relations and welfare.....	12,645,116	13,785,520	46,990	26,477,626
10. Insurance.....	71,313	2,136,308		2,207,621
11. Directors' fees.....				0
12. Travel and travel items.....	605,332	635,856	4,355	1,245,543
13. Rent and rent items.....	1,222,021	3,052,448	171,994	4,446,463
14. Equipment.....	3,424,099	7,236,760	2,906	10,663,765
15. Cost or depreciation of EDP equipment and software.....	3,048,434	3,207,805	143,358	6,399,596
16. Printing and stationery.....	10,507	2,141,084	696	2,152,287
17. Postage, telephone and telegraph, exchange and express.....	3,052,979	3,829,498	2,272	6,884,748
18. Legal and auditing.....	740,301	1,643,883	11,068	2,395,252
19. Totals (Lines 3 to 18).....	88,883,436	134,026,549	692,358	223,602,343
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of \$.....0.....		23,815,849		23,815,849
20.2 Insurance department licenses and fees.....	303,625	2,133,268	166	2,437,058
20.3 Gross guaranty association assessments.....		249,466		249,466
20.4 All other (excluding federal and foreign income and real estate).....		28,085		28,085
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4).....	303,625	26,226,668	166	26,530,458
21. Real estate expenses.....	980,545	1,414,767	14,056	2,409,368
22. Real estate taxes.....			386,708	386,708
23. Reimbursements by uninsured plans.....				0
24. Aggregate write-ins for miscellaneous expenses.....	1,512,588	6,448,947	53,916	8,015,451
25. Total expenses incurred.....	126,870,474	181,556,240	1,147,204	(a) 309,573,918
26. Less unpaid expenses - current year.....	109,408,928	36,969,574		146,378,502
27. Add unpaid expenses - prior year.....	113,090,688	34,119,102		147,209,790
28. Amounts receivable relating to uninsured plans, prior year.....				0
29. Amounts receivable relating to uninsured plans, current year.....				0
30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29).....	130,552,234	178,705,768	1,147,204	310,405,206

DETAILS OF WRITE-INS

2401. Misc Other General Expenses.....	1,512,588	(2,672,184)	53,916	(1,105,680)
2402. Credit Card Fees.....		11,947,002		11,947,002
2403. Recovery of Expense/Fees.....		(2,825,871)		(2,825,871)
2498. Summary of remaining write-ins for Line 24 from overflow page.....	0	0	0	0
2499. Totals (Lines 2401 through 2403 plus 2498) (Line 24 above).....	1,512,588	6,448,947	53,916	8,015,451

(a) Includes management fees of \$.....25,662,191 to affiliates and \$.....0 to non-affiliates.

EXHIBIT OF NET INVESTMENT INCOME

	1 Collected During Year	2 Earned During Year
1. U.S. government bonds.....	(a).....202,313202,313
1.1 Bonds exempt from U.S. tax.....	(a).....36,093,41535,403,733
1.2 Other bonds (unaffiliated).....	(a).....17,938,02418,259,349
1.3 Bonds of affiliates.....	(a).....
2.1 Preferred stocks (unaffiliated).....	(b).....
2.11 Preferred stocks of affiliates.....	(b).....
2.2 Common stocks (unaffiliated).....
2.21 Common stocks of affiliates.....
3. Mortgage loans.....	(c).....1,217,1261,247,339
4. Real estate.....	(d).....4,686,090
5. Contract loans.....
6. Cash, cash equivalents and short-term investments.....	(e).....1,018,6581,018,658
7. Derivative instruments.....	(f).....
8. Other invested assets.....
9. Aggregate write-ins for investment income.....00
10. Total gross investment income.....56,469,53660,817,482
11. Investment expenses.....	(g).....1,147,038
12. Investment taxes, licenses and fees, excluding federal income taxes.....	(g).....166
13. Interest expense.....	(h).....460,661
14. Depreciation on real estate and other invested assets.....	(i).....701,935
15. Aggregate write-ins for deductions from investment income.....0
16. Total deductions (Lines 11 through 15).....2,309,800
17. Net investment income (Line 10 minus Line 16).....58,507,682

DETAILS OF WRITE-INS

0901.
0902.
0903.
0998. Summary of remaining write-ins for Line 9 from overflow page.....00
0999. Totals (Lines 0901 through 0903 plus 0998) (Line 9 above).....00
1501.
1502.
1503.
1598. Summary of remaining write-ins for Line 15 from overflow page.....0
1599. Totals (Lines 1501 through 1503 plus 1598) (Line 15 above).....0

- (a) Includes \$.....748,187 accrual of discount less \$.....7,359,904 amortization of premium and less \$.....485,305 paid for accrued interest on purchases.
- (b) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued dividends on purchases.
- (c) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (d) Includes \$.....0 for company's occupancy of its own buildings; and excludes \$.....0 interest on encumbrances.
- (e) Includes \$.....1,018,658 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (f) Includes \$.....0 accrual of discount less \$.....0 amortization of premium.
- (g) Includes \$.....0 investment expenses and \$.....0 investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$.....0 interest on surplus notes and \$.....0 interest on capital notes.
- (i) Includes \$.....701,935 depreciation on real estate and \$.....0 depreciation on other invested assets.

EXHIBIT OF CAPITAL GAINS (LOSSES)

	1 Realized Gain (Loss) on Sales or Maturity	2 Other Realized Adjustments	3 Total Realized Capital Gain (Loss) (Columns 1 + 2)	4 Change in Unrealized Capital Gain (Loss)	5 Change in Unrealized Foreign Exchange Capital Gain (Loss)
1. U.S. government bonds.....0
1.1 Bonds exempt from U.S. tax.....176,567176,567
1.2 Other bonds (unaffiliated).....(501,156)(501,156)(151,796)
1.3 Bonds of affiliates.....0
2.1 Preferred stocks (unaffiliated).....0
2.11 Preferred stocks of affiliates.....0
2.2 Common stocks (unaffiliated).....02,734,285
2.21 Common stocks of affiliates.....0
3. Mortgage loans.....0
4. Real estate.....0
5. Contract loans.....0
6. Cash, cash equivalents and short-term investments.....44
7. Derivative instruments.....0
8. Other invested assets.....0
9. Aggregate write-ins for capital gains (losses).....00000
10. Total capital gains (losses).....(324,585)0(324,585)2,582,4890

DETAILS OF WRITE-INS

0901.0
0902.0
0903.0
0998. Summary of remaining write-ins for Line 9 from overflow page.....00000
0999. Totals (Lines 0901 through 0903 plus 0998) (Line 9 above).....00000

EXHIBIT OF NONADMITTED ASSETS

	1 Current Year Total Nonadmitted Assets	2 Prior Year Total Nonadmitted Assets	3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D).....			0
2. Stocks (Schedule D):			
2.1 Preferred stocks.....			0
2.2 Common stocks.....	3,682,632	1,993,549	(1,689,083)
3. Mortgage loans on real estate (Schedule B):			
3.1 First liens.....			0
3.2 Other than first liens.....			0
4. Real estate (Schedule A):			
4.1 Properties occupied by the company.....			0
4.2 Properties held for the production of income.....			0
4.3 Properties held for sale.....			0
5. Cash (Schedule E-Part 1), cash equivalents (Schedule E-Part 2) and short-term investments (Schedule DA).....			0
6. Contract loans.....			0
7. Derivatives (Schedule DB).....			0
8. Other invested assets (Schedule BA).....			0
9. Receivables for securities.....			0
10. Securities lending reinvested collateral assets (Schedule DL).....			0
11. Aggregate write-ins for invested assets.....	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	3,682,632	1,993,549	(1,689,083)
13. Title plants (for Title insurers only).....			0
14. Investment income due and accrued.....			0
15. Premiums and considerations:			
15.1 Uncollected premiums and agents' balances in the course of collection.....		1,243	1,243
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due.....			0
15.3 Accrued retrospective premiums and contracts subject to redetermination.....			0
16. Reinsurance:			
16.1 Amounts recoverable from reinsurers.....			0
16.2 Funds held by or deposited with reinsured companies.....			0
16.3 Other amounts receivable under reinsurance contracts.....			0
17. Amounts receivable relating to uninsured plans.....			0
18.1 Current federal and foreign income tax recoverable and interest thereon.....			0
18.2 Net deferred tax asset.....		1,949,910	1,949,910
19. Guaranty funds receivable or on deposit.....			0
20. Electronic data processing equipment and software.....	5,826,316	5,380,387	(445,929)
21. Furniture and equipment, including health care delivery assets.....	3,136,119	3,348,035	211,916
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0
23. Receivables from parent, subsidiaries and affiliates.....			0
24. Health care and other amounts receivable.....			0
25. Aggregate write-ins for other-than-invested assets.....	1,451,062	1,393,218	(57,844)
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	14,096,129	14,066,342	(29,787)
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0
28. TOTALS (Lines 26 and 27).....	14,096,129	14,066,342	(29,787)

DETAILS OF WRITE-INS

1101. Deferred Sales Expense.....			0
1102.....			0
1103.....			0
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0
1199. Totals (Lines 1101 through 1103 plus 1198) (Line 11 above).....	0	0	0
2501. Misc Receivable.....			0
2502. Prepaid expenses.....	1,451,062	1,393,218	(57,844)
2503.....			0
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	1,451,062	1,393,218	(57,844)

NOTES TO FINANCIAL STATEMENTS**Note 1 – Summary of Significant Accounting Policies and Going Concern****A. Accounting Practices**

The accompanying financial statements of IDS Property Casualty Insurance Company (the "Company") have been prepared on the basis of accounting practices prescribed or permitted by the Office of the Commissioner of Insurance of the State of Wisconsin.

The Office of the Commissioner of Insurance of the State of Wisconsin requires insurance companies domiciled in the State of Wisconsin to prepare their statutory financial statements in accordance with the National Association of Insurance Commissioners' NAIC *Accounting Practices and Procedures Manual* subject to any deviations prescribed or permitted by the Office of the Commissioner of Insurance of the State of Wisconsin.

No Permitted statutory accounting practices were used in the preparation of these financial statements.

A reconciliation of the Company's net income and capital and surplus between NAIC SAP and practices prescribed and permitted by the State of Wisconsin is shown below:

	SSAP #	F/S Page	F/S Line #	2018	2017
NET INCOME					
(1) Company state basis (Page 4, Line 20, Columns 1 & 2)	XXX	XXX	XXX	\$ 8,881,119	\$ (9,711,480)
(2) State Prescribed Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(3) State Permitted Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(4) NAIC SAP (1 – 2 – 3 = 4)	XXX	XXX	XXX	\$ 8,881,119	\$ (9,711,480)
SURPLUS					
(5) Company state basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 789,281,373	\$ 780,637,714
(6) State Prescribed Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(7) State Permitted Practices that are an increase/(decrease) from NAIC SAP					
				\$	\$
(8) NAIC SAP (5 – 6 – 7 = 8)	XXX	XXX	XXX	\$ 789,281,373	\$ 780,637,714

B. Use of Estimates in the Preparation of the Financial Statement

The preparation of financial statements of the Company in accordance with the NAIC Annual Statement Instructions and Accounting Practices and Procedures manual requires the use of management's estimates and assumptions that affect the amounts reported in these financial statements and notes. Actual results could differ from those estimates.

C. Accounting Policy

Direct, assumed and ceded premiums are earned ratably over the terms of the policies and reinsurance contracts. Unearned premiums are calculated on a daily basis and represent the unexpired portion of premiums written. Expenses incurred in connection with acquiring new insurance business, including acquisition costs, are charged to operations as incurred. Expenses incurred are reduced for ceding allowances received or receivable.

Net investment income earned consists primarily of interest, dividend and rent income less investment related expense. Income from real estate is the imputed income for space occupied by the Company. Realized capital gains and losses are determined using the specific identification basis when securities are sold, redeemed or otherwise disposed.

In addition, the Company uses the following accounting policies:

- (1) Short-term investments are stated at amortized cost using the straight-line method.
- (2) Investment grade bonds, other than loan-backed and structured securities, are stated at amortized value using the scientific amortization method. Non-Investment grade bonds with NAIC designations of 3 through 6; are stated at the lower of amortized value or fair value.
- (3) Common stocks, other than investments in stocks of subsidiaries, are reported at fair value as determined by the Securities Valuation Office of the NAIC, and the net unrealized gains or losses are reported in unassigned surplus. In 2018, there was no common stock other than investments in stocks of subsidiaries.
- (4) The Company has no preferred stocks.
- (5) Mortgage loans are stated at the unpaid principle balance net of allowances for loan losses, if any.
- (6) Loan-backed and structured securities are carried at amortized cost using the scientific amortization method and include anticipated prepayments. Changes in estimated cash flow and in coupon interest cash flows from original purchase assumptions are accounted for using the retrospective method.
- (7) The Company owns Ameriprise Insurance Company, an insurance subsidiary, and it is stated at its statutory equity value. The Company owns Ameriprise Auto & Home Insurance Agency Inc., a non-insurance subsidiary, and it is stated at its equity value and fully non-admitted.
- (8) The Company has no investments in joint ventures, partnerships or limited liability companies.
- (9) The Company has no derivative investments.
- (10) The Company does not use anticipated investment income as a factor in the premium deficiency calculation.

NOTES TO FINANCIAL STATEMENTS

(11) Reserve Estimation Methods

Losses and loss adjustment expenses represent management's best estimate of the ultimate net cost of all reported and unreported losses incurred for each period. The Company does not discount loss and loss adjustment expense reserves. The reserves for unpaid losses and loss adjustment expenses are estimated using individual case-basis valuations and statistical analyses. Those estimates are subject to the effects of trends in loss severity and frequency. Although considerable variability is inherent in such estimates, management believes the reserves for losses and loss adjustment expenses are adequate. The estimates are continually reviewed and adjusted, as necessary, as experience develops or new information becomes known; such adjustments are included in current operations. This process is completed for all coverages and for all accident years. Changes are made as needed throughout the development of an accident year. The Company incurs no expense and does not write insurance business related to toxic waste cleanup, asbestos-related illnesses or other environmental remediation exposures.

The anticipated effect of inflation is implicitly considered when estimating liabilities for losses and loss adjustment expenses. While anticipated price increases due to inflation are considered in estimating the ultimate claim costs, the increase in average severities of claims is caused by a number of factors that vary with the individual type of policy written. Future average severities are projected based on historical trends adjusted for implemented changes in underwriting standards, policy provisions, and general economic trends. Those anticipated trends are monitored based on actual development and modified if necessary.

(12) The Company has a written capitalization policy for purchase of items such as electronic data processing equipment, software, furniture, other equipment and leasehold improvements. The predefined capitalization thresholds under this policy have not changed from those of the prior year.

(13) The Company has no pharmaceutical rebate receivables.

D. Going Concern

Based upon its evaluation of relevant conditions and events, management does not have substantial doubt about the Company's ability to continue as a going concern.

Note 2 – Accounting Changes and Correction of Errors

Not applicable.

Note 3 – Business Combinations and Goodwill

- A. The Company was not involved in any business combinations during the course of the year.
- B. The Company was not involved in any merger activity during the course of the year.
- C. Since the Company was not involved in any business combinations or merger activity, no impairment loss was recognized.

Note 4 – Discontinued Operations

The Company had no discontinued operations during the calendar year.

Note 5 – Investments

A. Mortgage Loans, including Mezzanine Real Estate Loans

- (1) The maximum and minimum lending rates for mortgage loans during 2018 were: 4.54% and 4.19%.
- (2) For commercial mortgage loans, the maximum percentage of any one loan to the value of security at the time of the loan, exclusive of insured or guaranteed or purchase money mortgage was 80%. The Company does not originate new residential mortgage loans.
- (3) There were no taxes, assessments, and any additional amounts advanced and not included in the mortgage loan.
- (4) Age Analysis of Mortgage Loans and Identification of Mortgage Loans in which the Insurer is a Participant or Co-Lender in a Mortgage Loan Agreement:

	Farm	Residential		Commercial		Mezzanine	Total
		Insured	All Other	Insured	All Other		
a. Current Year							
1. Recorded Investment (All)							
(a) Current	\$	\$	\$	\$	\$ 36,116,877	\$	\$ 36,116,877
(b) 30-59 Days Past Due	\$	\$	\$	\$	\$	\$	\$
(c) 60-89 Days Past Due	\$	\$	\$	\$	\$	\$	\$
(d) 90-179 Days Past Due	\$	\$	\$	\$	\$	\$	\$
(e) 180+ Days Past Due	\$	\$	\$	\$	\$	\$	\$
2. Accruing Interest 90-179 Days Past Due							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest Accrued	\$	\$	\$	\$	\$	\$	\$
3. Accruing Interest 180+ Days Past Due							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest Accrued	\$	\$	\$	\$	\$	\$	\$
4. Interest Reduced							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
(b) Number of Loans							
(c) Percent Reduced	%	%	%	%	%	%	%

NOTES TO FINANCIAL STATEMENTS

	Farm	Residential		Commercial		Mezzanine	Total
		Insured	All Other	Insured	All Other		
5. Participant or Co-Lender in a Mortgage Loan Agreement							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
b. Prior Year							
1. Recorded Investment (All)							
(a) Current	\$	\$	\$	\$	\$ 29,888,908	\$	\$ 29,888,908
(b) 30-59 Days Past Due	\$	\$	\$	\$	\$	\$	\$
(c) 60-89 Days Past Due	\$	\$	\$	\$	\$	\$	\$
(d) 90-179 Days Past Due	\$	\$	\$	\$	\$	\$	\$
(e) 180+ Days Past Due	\$	\$	\$	\$	\$	\$	\$
2. Accruing Interest 90-179 Days Past Due							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest Accrued	\$	\$	\$	\$	\$	\$	\$
3. Accruing Interest 180+ Days Past Due							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
(b) Interest Accrued	\$	\$	\$	\$	\$	\$	\$
4. Interest Reduced							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$
(b) Number of Loans							
(c) Percent Reduced	%	%	%	%	%	%	%
5. Participant or Co-Lender in a Mortgage Loan Agreement							
(a) Recorded Investment	\$	\$	\$	\$	\$	\$	\$

- (5) Investment in Impaired Loans with or without Allowance for Credit Losses and Impaired Loans Subject to a Participant or Co-Lender Mortgage Loan Agreement for which the Reporting Entity is Restricted from Unilaterally Foreclosing on the Mortgage Loan: None
- (6) Investment in Impaired Loans – Average Recorded Investment, Interest Income Recognized, Recorded Investment on Nonaccrual Status and Amount of Interest Income Recognized Using a Cash-Basis Method of Accounting: None
- (7) Allowance for Credit Balances: None
- (8) Mortgage Loans Derecognized as a Result of Foreclosure: None
- 9) Interest accrual is stopped when a mortgage is 90 days delinquent. Income received while a loan is over 90 days delinquent is recognized on a cash basis until the loan is brought current and then is returned to a normal accrual status.

B. Debt Restructuring - The Company has no restructured debt.

C. Reverse Mortgages - The Company has no reverse mortgages.

D. Loan-Backed and Structured Securities ("LBaSS")

- (1) Prepayment assumptions for LBaSS are based on financial information provided by a licensed data provider. These assumptions are consistent with the current interest rate and economic environment. The retrospective method is used to value LBaSS except in a situation where rate changes result in recalculation of the effective yield. The recalculated yield is used to amortize the investment as of the rate change date.
- (2) During the year ended December 31, 2018, the Company had no other-than- temporary impairments ("OTTI") recognized on LBaSS due to intent to sell or inability or lack of intent to retain for a period of time sufficient to recover the amortized cost.
- (3) The Company has no LBaSS for which an OTTI was recognized due to the fact that the present value of cash flows expected to be collected is less than amortized cost basis of the securities.
- (4) The following table provides information about investments in LBaSS for which the carrying value (amortized cost) exceeds fair value and the length of time that individual securities have continuously had amortized cost in excess of fair value, as of December 31, 2018:

a. The aggregate amount of unrealized losses:	1. Less than 12 Months	\$	(1,152,896)
	2. 12 Months or Longer	\$	(2,582,315)
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$	102,430,802
	2. 12 Months or Longer	\$	82,035,897

- (5) For all LBaSS for which carrying value exceeds fair value, the Company has the intent and ability to retain the investment in the security for a period of time sufficient to recover the carrying value.

E. Dollar Repurchase Agreements and/or Securities Lending Transactions - The Company has not entered into any repurchasing agreements or securities lending transactions.

NOTES TO FINANCIAL STATEMENTS

- F. Repurchase Agreements Transactions Accounted for as Secured Borrowing - The Company has not entered into any repurchase agreements transactions accounted for as secured borrowing.
- G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing - The Company has not entered into any reverse repurchase agreements transactions accounted for as secured borrowing.
- H. Repurchase Agreements Transactions Accounted for as a Sale - The Company has not entered into any repurchase agreements transactions accounted for as a sale.
- I. Reverse Repurchase Agreements Transactions Accounted for as a Sale - The Company has not entered into any reverse repurchase agreements transactions accounted for as a sale.
- J. Real Estate - See footnote 15.
- K. Low-Income Housing Tax Credits (LIHTC) - The Company has no investments in low income housing tax credits.
- L. Restricted Assets

(1) Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted					Current Year					
	Current Year				5	6	7	8	9	Percentage	
	1	2	3	4						10	11
	Total General Account (G/A)	G/A Supporting Protected Cell Account Activity (a)	Total Protected Cell Account Restricted Assets	Protected Cell Account Assets Supporting G/A Activity (b)	Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)
a. Subject to contractual obligation for which liability is not shown	\$	\$	\$	\$	\$	\$	\$	\$	\$	%	%
b. Collateral held under security lending arrangements										%	%
c. Subject to repurchase agreements										%	%
d. Subject to reverse repurchase agreements										%	%
e. Subject to dollar repurchase agreements										%	%
f. Subject to dollar reverse repurchase agreements										%	%
g. Placed under option contracts										%	%
h. Letter stock or securities restricted as to sale - excluding FHLB capital stock										%	%
i. FHLB capital stock										%	%
j. On deposit with states	4,499,657				4,499,657	4,521,547	(21,890)		4,499,657	0.2%	0.3%
k. On deposit with other regulatory bodies										%	%
l. Pledged as collateral to FHLB (including assets backing funding agreements)										%	%
m. Pledged as collateral not captured in other categories										%	%
n. Other restricted assets										%	%
o. Total Restricted Assets	\$ 4,499,657	\$	\$	\$	\$ 4,499,657	\$ 4,521,547	\$ (21,890)	\$	\$ 4,499,657	0.2%	0.3%

- (a) Subset of column 1
- (b) Subset of column 3
- (c) Column 5 divided by Asset Page, Column 1, Line 28
- (d) Column 9 divided by Asset Page, Column 3, Line 28

- (2) The Company does not have any assets pledged as collateral not captured in other categories.
- (3) The Company does not have any other restricted assets.
- (4) The Company does not have any collateral received and reflected as assets.

- M. Working Capital Finance Investments - Not applicable.
- N. Offsetting and Netting of Assets and Liabilities - Not applicable.
- O. Structured Notes - Not applicable.

NOTES TO FINANCIAL STATEMENTS

P. 5GI Securities

Investment	Number of 5GI Securities		Aggregate BACV		Aggregate Fair Value	
	Current Year	Prior Year	Current Year	Prior Year	Current Year	Prior Year
(1) Bonds – AC	2		\$ 5,116,718	\$	\$ 5,389,574	\$
(2) Bonds – FV						
(3) LB & SS – AC						
(4) LB & SS – FV						
(5) Preferred Stock – AC						
(6) Preferred Stock – FV						
(7) Total (1+2+3+4+5+6)	2		\$ 5,116,718	\$	\$ 5,389,574	\$

AC – Amortized Cost

FV – Fair Value

Q. Short Sales - Not applicable.

R. Prepayment Penalty and Acceleration Fees

	General Account	Protected Cell
(1) Number of CUSIPs	2	
(2) Aggregate Amount of Investment Income	\$ 409,924	\$

Note 6 – Joint Ventures, Partnerships and Limited Liability Companies

A. The Company had no investments in joint ventures, partnerships or limited liability companies that exceeded 10% of admitted assets.

B. The Company did not recognize any impairment write-down for investments in joint ventures, partnerships or limited liability companies.

Note 7 – Investment Income

A. Accrued Investment Income - The Company does not admit investment income due and accrued if amounts are over 90 days past due.

B. Amounts Nonadmitted - The total amount nonadmitted was \$0.

Note 8 – Derivative Instruments

A-H. The Company neither holds nor has issued any derivative financial instruments.

Note 9 – Income Taxes

A. Deferred Tax Assets/(Liabilities)

1. Components of Net Deferred Tax Asset/(Liability)

	2018			2017			Change		
	1 Ordinary	2 Capital	3 (Col 1+2) Total	4 Ordinary	5 Capital	6 (Col 4+5) Total	7 (Col 1-4) Ordinary	8 (Col 2-5) Capital	9 (Col 7+8) Total
a. Gross deferred tax assets	\$ 23,750,380	\$	\$ 23,750,380	\$ 22,047,797	\$	\$ 22,047,797	\$ 1,702,583	\$	\$ 1,702,583
b. Statutory valuation allowance adjustment									
c. Adjusted gross deferred tax assets (1a-1b)	\$ 23,750,380	\$	\$ 23,750,380	\$ 22,047,797	\$	\$ 22,047,797	\$ 1,702,583	\$	\$ 1,702,583
d. Deferred tax assets nonadmitted				1,949,910		1,949,910	(1,949,910)		(1,949,910)
e. Subtotal net admitted deferred tax asset (1c-1d)	\$ 23,750,380	\$	\$ 23,750,380	\$ 20,097,887	\$	\$ 20,097,887	\$ 3,652,493	\$	\$ 3,652,493
f. Deferred tax liabilities	2,632,669	115,319	2,747,988	369,696	13,809	383,505	2,262,973	101,510	2,364,483
g. Net admitted deferred tax assets/(net deferred tax liability) (1e-1f)	\$ 21,117,711	\$ (115,319)	\$ 21,002,392	\$ 19,728,191	\$ (13,809)	\$ 19,714,382	\$ 1,389,520	\$ (101,510)	\$ 1,288,010

NOTES TO FINANCIAL STATEMENTS

2. Admission Calculation Components SSAP No. 101

	2018			2017			Change		
	1 Ordinary	2 Capital	3 (Col 1+2) Total	4 Ordinary	5 Capital	6 (Col 4+5) Total	7 (Col 1-4) Ordinary	8 (Col 2-5) Capital	9 (Col 7+8) Total
a. Federal income taxes paid in prior years recoverable through loss carrybacks	\$	\$	\$	\$	\$	\$	\$	\$	\$
b. Adjusted gross deferred tax assets expected to be realized (excluding the amount of deferred tax assets from 2(a) above) after application of the threshold limitation. (The lesser of 2(b)1 and 2(b)2 below)	21,117,711		21,117,711	19,728,191		19,728,191	1,389,520		1,389,520
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date									
2. Adjusted gross deferred tax assets allowed per limitation threshold			21,117,711			19,728,191			1,389,520
c. Adjusted gross deferred tax assets (excluding the amount of deferred tax assets from 2(a) and 2(b) above) offset by gross deferred tax liabilities	2,632,669		2,632,669	369,696		369,696	2,262,973		2,262,973
d. Deferred tax assets admitted as the result of application of SSAP 101. Total (2(a)+2(b)+2(c))	\$ 23,750,380	\$	\$ 23,750,380	\$ 20,097,887	\$	\$ 20,097,887	\$ 3,652,493	\$	\$ 3,652,493

3. Other Admissibility Criteria

	2018	2017
a. Ratio percentage used to determine recovery period and threshold limitation amount	1,097.6%	1,136.3%
b. Amount of adjusted capital and surplus used to determine recovery period and threshold limitation in 2(b)2 above	\$ 768,278,981	\$ 760,923,331

4. Impact of Tax Planning Strategies

(a) Determination of adjusted gross deferred tax assets and net admitted deferred tax assets, by tax character as a percentage.

	2018		2017		Change	
	1 Ordinary	2 Capital	3 Ordinary	4 Capital	5 (Col. 1-3) Ordinary	6 (Col. 2-4) Capital
1. Adjusted gross DTAs amount from Note 9A1(c)	\$ 23,750,380	\$	\$ 22,047,797	\$	\$ 1,702,583	\$
2. Percentage of adjusted gross DTAs by tax character attributable to the impact of tax planning strategies	%	%	%	%	%	%
3. Net Admitted Adjusted Gross DTAs amount from Note 9A1(e)	\$ 23,750,380	\$	\$ 20,097,887	\$	\$ 3,652,493	\$
4. Percentage of net admitted adjusted gross DTAs by tax character admitted because of the impact of tax planning strategies	22.0%	%	63.0%	%	(41.0)%	%

(b) Does the company's tax planning strategies include the use of reinsurance? No

NOTES TO FINANCIAL STATEMENTS**B. Deferred Tax Liabilities Not Recognized**

There are no differences for which deferred tax liabilities are not recognized.

C. Current and Deferred Income Taxes**1. Current Income Tax**

	1	2	3
	2018	2017	(Col 1-2) Change
a. Federal	\$ (7,145,157)	\$ (22,338,584)	\$ 15,193,427
b. Foreign	\$	\$	\$
c. Subtotal	\$ (7,145,157)	\$ (22,338,584)	\$ 15,193,427
d. Federal income tax on net capital gains	\$ (68,163)	\$ (103,029)	\$ 34,866
e. Utilization of capital loss carry-forwards	\$	\$	\$
f. Other	\$	\$ (264,949)	\$ 264,949
g. Federal and Foreign income taxes incurred	\$ (7,213,320)	\$ (22,706,562)	\$ 15,493,242

2. Deferred Tax Assets

	1	2	3
	2018	2017	(Col 1-2) Change
a. Ordinary:			
1. Discounting of unpaid losses	\$	\$	\$
2. Unearned premium reserve	14,831,611	15,837,745	(1,006,134)
3. Policyholder reserves	6,032,074	3,641,572	2,390,502
4. Investments			
5. Deferred acquisition costs			
6. Policyholder dividends accrual			
7. Fixed assets			
8. Compensation and benefits accrual	1,600,983	1,712,114	(111,131)
9. Pension accrual			
10. Receivables - nonadmitted			
11. Net operating loss carry-forward			
12. Tax credit carry-forward			
13. Other (items <=5% and >5% of total ordinary tax assets)	1,285,712	856,366	429,346
Other (items listed individually >5% of total ordinary tax assets)			
99. Subtotal	23,750,380	22,047,797	1,702,583
b. Statutory valuation allowance adjustment			
c. Nonadmitted		1,949,910	(1,949,910)
d. Admitted ordinary deferred tax assets (2a99-2b-2c)	23,750,380	20,097,887	3,652,493
e. Capital:			
1. Investments	\$	\$	\$
2. Net capital loss carry-forward			
3. Real estate			
4. Other (items <=5% and >5% of total capital tax assets)			
Other (items listed individually >5% of total capital tax assets)			
99. Subtotal	\$	\$	\$
f. Statutory valuation allowance adjustment			
g. Nonadmitted			
h. Admitted capital deferred tax assets (2e99-2f-2g)			
i. Admitted deferred tax assets (2d+2h)	\$ 23,750,380	\$ 20,097,887	\$ 3,652,493

3. Deferred Tax Liabilities

	1	2	3
	2018	2017	(Col 1-2) Change
a. Ordinary:			
1. Investments	\$	\$	\$
2. Fixed assets		369,696	(369,696)
3. Deferred and uncollected premium			
4. Policyholder reserves	2,632,669		2,632,669
5. Other (items <=5% and >5% of total ordinary tax liabilities)			
Other (items listed individually >5% of total ordinary tax liabilities)			
99. Subtotal	2,632,669	369,696	2,262,973
b. Capital:			
1. Investments	115,319	13,809	101,510
2. Real estate			
3. Other (Items <=5% and >5% of total capital tax liabilities)			
Other (items listed individually >5% of total capital tax liabilities)			
99. Subtotal	115,319	13,809	101,510
c. Deferred tax liabilities (3a99+3b99)	\$ 2,747,988	\$ 383,505	\$ 2,364,483
4. Net Deferred Tax Assets (2i - 3c)	\$ 21,002,392	\$ 19,714,382	\$ 1,288,010

NOTES TO FINANCIAL STATEMENTS

D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate Among the more significant book to tax adjustments were the following:

	Amount	Tax Effect at 21%	Effective Tax Rate
Net gain from operations before federal income taxes	\$ 1,992,384	\$	
Realized capital gains	(324,585)		
Income before taxes	<u>\$ 1,667,799</u>	\$ 350,238	21.0%
Permanent differences:			
Unrecognized Tax Benefits	10,840,205	2,276,443	136.49%
Other Permanent adjustments	85,101	28,849	1.73%
Employee Transit Addback	90,811	19,070	1.14%
Change in Nonadmitted Assets	(289,611)	(60,818)	-3.65%
Stock Compensation	(790,284)	(165,960)	-9.95%
Audit Adjustment	(963,152)	(202,262)	-12.13%
STAT Surplus Prior Period Adjustment	(2,128,261)	(446,935)	-26.80%
Impact of Tax Act		(2,738,478)	-164.20%
Tax Exempt Muni Interest	(26,569,955)	(5,579,691)	-334.55%
Total		<u>\$ (6,519,543)</u>	<u>-390.91%</u>
Federal and foreign income taxes incurred		\$ (7,213,320)	-432.51%
Change in net deferred income taxes		693,777	41.60%
Total statutory income tax		<u>\$ (6,519,543)</u>	<u>-390.91%</u>

On December 22, 2017, the Tax Cuts and Jobs Act ("Tax Act") was signed into law. Federal income taxes for the year ended December 31, 2017 included a \$14 million surplus charge for the re-measurement of deferred tax assets and liabilities to the Tax Act's statutory rate of 21%. In 2018, the Company finalized its accounting related to the Tax Act and determined no adjustments were necessary.

E. Operating Loss Carryforwards and Income Taxes Available for Recoupment

- As of December 31, 2018, there are no net operating loss, capital loss, AMT credit or foreign tax credit carry forwards.
- The amount of federal income taxes incurred that are available for recoupment in the event of future net losses are:

Year	Amounts
2018	\$45,181
2017	\$145,406
2016	\$210,957

- The Company did not have any aggregate amount of deposits admitted under Section 6603 of the Internal Revenue Service Code.

F. Consolidated Federal Income Tax Return

- The Company's taxable income is included in the consolidated federal income tax return of Ameriprise Financial, Inc.
- The method of allocation among the companies is subject to written agreement, approved by the Board of Directors. Allocation is based upon separate return calculations with current credit for net losses to the extent they are utilized by the consolidated group. Inter-company tax balances are settled quarterly in accordance with the terms of the written agreement.

G. The Company does not expect a significant increase in tax contingencies within the next 12 month period following the balance sheet date.

H. Repatriation Transition Tax (RTT) - RTT owed under the TCJA - Not applicable.

I. Alternative Minimum Tax (AMT Credit) - Not applicable.

Note 10 – Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

A. Nature of the Relationship Involved - All outstanding shares of the Company are owned by Ameriprise Financial, Inc. (the "Parent") domiciled in the State of Delaware.

Ameriprise Insurance Company is a Wisconsin-domiciled, wholly owned subsidiary of the Company. Ameriprise Insurance Company was organized October 14, 2005 and commenced business on January 26, 2006. Ameriprise Insurance Company was capitalized on January 17, 2006.

B & C. Transactions and Dollar Amounts of Transactions - During the year the Company paid the Parent \$25,662,191 of fees for management and cost sharing arrangements. The Company did not receive additional paid in capital from the Parent nor did the Company issue any dividends during 2018.

There were no changes to the terms of any inter-company arrangements during the calendar year that impacted the results of the financial statements.

D. Amounts Due From or To Related Parties - The Company receives certain services from the Parent. The Company paid \$25,662,191 in 2018 and \$24,817,454 in 2017, respectively, for management, administrative, and investment advisory services. The basis for these allocations has been determined by management of the Company and the Parent. Expenses allocated to the Company may not be reflective of expenses that would have been incurred by the Company on a stand-alone basis. At December 31, 2018 and 2017, respectively, the Company reported \$2,864,104 and \$1,704,530 as amounts due from the Parent and affiliates and \$8,421,174 and \$8,416,158, respectively, as amounts payable to the Parent and affiliates for the same periods.

At December 31, 2018 and 2017, the Company reported \$1,804,251 and \$0, respectively, as amounts due from Ameriprise Auto & Home Insurance Agency Inc. These amounts due are for sales, servicing, accounting, compliance, audit, legal and other general administrative services.

At December 31, 2018 and 2017, respectively, the Company reported \$1,570,757 and \$1,667,498 as amounts due from Ameriprise Insurance Company. These amounts due are for management and cost sharing arrangements. The terms of the settlement require these amounts to be settled on a quarterly basis. In 2018 and 2017, the Company received \$6,723,130 and \$6,889,356, respectively, for these services.

NOTES TO FINANCIAL STATEMENTS

At December 31, 2018 and 2017, respectively, the Company reported \$1,420,785 and \$1,508,289 as amounts due to Ameriprise Insurance Company for ceding commission due pursuant to the Reinsurance Agreement. In 2018 and 2017, the Company paid \$6,081,223 and \$6,231,579, respectively, for these services.

- E. Guarantees or Undertakings - There have not been any guarantees or undertakings, written or otherwise, for the benefit of an affiliate or related party that resulted in a material contingent exposure of the reporting entity's or any related party's assets or liabilities.
- F. Material Management or Service Contracts and Cost-Sharing Arrangements
- (1) The Company has a Service and Cost Allocation Agreement which is a service level contract, effective December 31, 2005 with the Parent for which the Company pays for data processing, human resource, legal, tax, and audit services. This agreement was amended and restated on April 21, 2006 and amended on April 30, 2009.
 - (2) Federal Income Tax Sharing Agreement effective December 1, 2010 and State Income Tax Sharing Agreement effective January 1, 2010 between the Company and Ameriprise Financial, Inc. that outlines the allocation method for any federal and state income tax charges or refunds that the Company may incur.
 - (3) Inter-company Agency Agreement, effective December 31, 2005, between the Company and Ameriprise Auto & Home Insurance Agency Inc. whereby the Company will provide sales, servicing, accounting, compliance, audit, legal and other general administrative services.
 - (4) Reinsurance and Cost Sharing Agreement, effective January 1, 2006 and amended February 1, 2010, and amended February 1, 2012, between the Company and Ameriprise Insurance Company, whereby Ameriprise Insurance Company agrees to cede and the Company agrees to reinsure certain liabilities, under or arising out of property or casualty insurance policies that have been issued or renewed by Ameriprise Insurance Company on a 100% quota share basis. Effective February 1, 2012, the Company pays Ameriprise Insurance Company an 18% ceding commission in consideration for the Company's expenses for business ceded under the agreement. The Company will provide sales, servicing, accounting, compliance, audit, legal and other general administrative services as part of the cost sharing.
 - (5) Investment Management and Services Agreement, effective October 1, 2005 and amended and restated on April 21, 2006, between the Company and Columbia Management Investment Services Corp., LLC, whereby Columbia Management Investments Service Corp, LLC agrees to provide investment management and accounting services for the Company assets.
 - (6) Ameriprise and the Company entered into a capital Support Agreement on September 30, 2015, pursuant to which the Parent agrees to commit such capital to the Company as is necessary to maintain the Company's current financial strength ratings by AM Best. The maximum capital amount is \$150 million. Effective February 1, 2018, this agreement was amended to revise the expiration date to be April 1, 2019. For the year ended December 31, 2018, the Company did not draw upon the Capital Support Agreement.
- G. Nature of the Control Relationship - The Company owns all outstanding shares of Ameriprise Insurance Company and Ameriprise Auto & Home Insurance Agency Inc. All outstanding shares of the Company are owned by the parent company, Ameriprise Financial.
- H. Amount Deducted from the Value of Upstream Intermediate Entity or Ultimate Parent Owned - The Company holds no ownership in any upstream intermediate entity including the parent company, Ameriprise Financial, and therefore has no reduction for the value of such ownership in admitted assets that were reported at the end of the statement period.
- I. The Company does not have any investments in SCA's that exceed 10% of admitted assets.
- J. Investments in Impaired SCAs - The Company recorded no write-downs for impairment of assets in any affiliates during the calendar year.
- K. Investment in Foreign Insurance Subsidiary - Not applicable.
- L. Investment in Downstream Noninsurance Holding Company - The Company has no investment in a downstream noninsurance holding company.
- M. All SCA Investments
- (1) Balance Sheet Value (Admitted and Nonadmitted) All SCAs (Except 8b(i) Entities)
- | SCA Entity | Percentage of SCA Ownership | Gross Amount | Admitted Amount | Nonadmitted Amount |
|---|-----------------------------|--------------|-----------------|--------------------|
| a. SSAP No. 97 8a Entities | | | | |
| | % | \$ | \$ | \$ |
| Total SSAP No. 97 8a Entities | XXX | \$ | \$ | \$ |
| b. SSAP No. 97 8b(ii) Entities | | | | |
| Ameriprise Auto & Home Insurance Agency Inc. | 100.0% | \$ 3,682,632 | \$ | \$ 3,682,632 |
| Total SSAP No. 97 8b(ii) Entities | XXX | \$ 3,682,632 | \$ | \$ 3,682,632 |
| c. SSAP No. 97 8b(iii) Entities | | | | |
| | % | \$ | \$ | \$ |
| Total SSAP No. 97 8b(iii) Entities | XXX | \$ | \$ | \$ |
| d. SSAP No. 97 8b(iv) Entities | | | | |
| | % | \$ | \$ | \$ |
| Total SSAP No. 97 8b(iv) Entities | XXX | \$ | \$ | \$ |
| e. Total SSAP No. 97 8b Entities (except 8b(i) entities)
(b + c + d) | XXX | \$ 3,682,632 | \$ | \$ 3,682,632 |
| f. Aggregate Total (a + e) | XXX | \$ 3,682,632 | \$ | \$ 3,682,632 |
- (2) NAIC Filing Response Information - Not applicable.
- N. Investment in Insurance SCAs - The Company owns one insurance SCA entity that is carried at audited statutory equity value. Ameriprise Insurance Company follows no state prescribed or permitted practices that depart from NAIC statutory accounting practices and procedures (NAIC SAP).
- O. SCA Loss Tracking - Not applicable.

Note 11 – Debt

- A. Debt, Including Capital Notes

NOTES TO FINANCIAL STATEMENTS

As disclosed in Note 15 – Leases, the Company entered into a sales/leaseback transaction that has been recorded as a financing transaction. The lease was amended on October 1, 2012 with a lease extension until December 31, 2024. As a result, the balance sheet at December 31, 2018, reflects a mortgage payable in the amount of \$11,125,758 payable to the lessor of the real estate. The lease will be paid based on the schedule listed. The loan was amortized using an implicit rate of 4.976% until October 1, 2012. After October 1, 2012 the borrowing rate is 4.25%. The annual rent payments for 2018 were \$1,250,114. Interest paid under this agreement during 2017 was \$486,200.

Payment Schedule for the next 5 years:

Period	Annual Rate of Base Rent	Monthly Installments January-June	Monthly Installments July-December
01/01/19 - 12/31/19	\$1,265,741	\$104,823	\$106,134
01/01/20 – 12/31/20	\$1,281,563	\$106,134	\$107,460
01/01/21 - 12/31/21	\$1,297,582	\$107,460	\$108,803
01/01/22 - 12/31/22	\$1,313,802	\$108,803	\$110,164
01/01/23 - 12/31/23	\$1,330,224	\$110,164	\$111,541

B. The Company has no funding agreements with the Federal Home Loan Bank.

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

A. Defined Benefit Plan - The Company does not sponsor any defined benefit plans.

B. Investment Policies and Strategies - Not applicable.

C. Fair Value of Plan Assets - Not applicable.

D. Basis Used to Determine Expected Long-Term Rate-of-Return - Not applicable.

E. Defined Contribution Plans - The Company participates in the Parent's Retirement Plan which covers all permanent employees age 21 and over who have met certain employment requirements. Contributions to the retirement plan are based on participant's age, years of service, and total compensation for the year. Funding of retirement costs for plan complies with the applicable minimum funding requirements specified by ERISA. The Company's share of net periodic cost was \$2,973,897 and \$2,579,937 for the years ended December 31, 2018 and 2017, respectively.

The Company participates in the Parent's 401(k) savings plan and the Company's share of contributions for the 401(k) savings plan was \$3,865,131 and \$3,477,378 for 2018 and 2017, respectively.

The Company participates in the Parent's Incentive Compensation Plan. Employees, directors, and independent contractors are eligible to receive incentive awards, including stock options, restricted stock awards, restricted stock units, performance shares, and similar awards designed to comply with the applicable federal regulations and laws of jurisdiction. In 2018 and 2017, respectively, \$1,353,658 and \$1,300,181 was expensed for stock options and restricted stock awards.

F. Multiemployer Plans - Not applicable.

G. Consolidated/Holding Company Plans - See Note 12B.

H. Postemployment Benefits and Compensated Absences - The Company participates in the Parent's defined benefit healthcare plans that provide healthcare and life insurance benefits to retired U.S. employees. The plans include participant contributions and service-related eligibility requirements. Upon retirement, such employees are considered to have been employees of the Parent. The Parent expenses these benefits and allocates the expenses. The Company has no other post-employment benefits or compensated absences except for compensation related to earned vacation pay.

I. Impact of Medicare Modernization Act on Postretirement Benefits (INT 04-17) - The Parents provides health care benefits to retire employees. See Note 12E.

Note 13 – Capital and Surplus, Shareholder's Dividend Restrictions and Quasi-Reorganizations

(1) Number of Share and Par or State Value of Each Class - The Company has 2,000,000 shares of authorized common stock with 2,000,000 shares issued and outstanding. The par value of each share of common stock is \$2.50.

(2) Dividend Rate, Liquidation Value and Redemption Schedule of Preferred Stock Issues - Not applicable.

(3) Dividend Restrictions - Dividends paid by the Company are restricted by Wisconsin insurance regulations. The payment of dividends by the Company is limited and cannot be made except from earned profits of the Company and, in certain circumstances, without prior approval of the Office of the Commissioner of Insurance of the State of Wisconsin.

The maximum dividend available for distribution, without prior approval of the Office of the Commissioner of Insurance of the State of Wisconsin (OCI), is the lesser of 10% of the previous year-end capital and surplus or greater of 1) previous year's net income less realized capital gains, or 2) aggregate net income of previous three years less realized capital gains.

(4) Dates and Amounts of Dividends Paid - There were no dividends paid in 2018 and 2017.

(5) Profits that may be Paid as Ordinary Dividends to Stockholders - See Note 13.C above.

(6) Restrictions Plans on Unassigned Funds (Surplus) - See Note 13.C above.

(7) Amount of Advances to Surplus not Repaid - Not applicable.

(8) Amount of Stock Held for Special Purposes - Not applicable.

(9) Changes in Special Surplus Funds for 2018 and 2017 were \$0 and \$0.

(10) The Portion of Unassigned Funds (Surplus) Represented or Reduced by Unrealized Gains and Losses is: \$2,582,489.

(11) The Reporting Entity Issued the Following Surplus Debentures or Similar Obligations - Not applicable.

NOTES TO FINANCIAL STATEMENTS

- (12) The impact of any restatement due to prior quasi-reorganizations is as follows - Not applicable.
- (13) Effective Date of Quasi-Reorganization for a Period of Ten Years Following Reorganization - Not applicable.

Note 14 – Liabilities, Contingencies and Assessments

- A. Contingent Commitments - The Company entered into an incentive compensation agreement with one of their large business partners. The incentive compensation is based on profitability and growth during the partner's fiscal year. During 2018, the Company paid a total of \$4,673,268 in incentive compensation and has a contingency accrual of \$1,398,295 at 12/31/2018.

The Company has made no guarantees on behalf of affiliates. See Note 10E.

- B. Assessments - The Company is subject to guaranty funds and other assessments by the states in which it writes business. Most assessments are recorded either at the time the assessments are levied or, in the case of premium-based assessments, at the time the premiums are written. The Company is not subject to loss-based assessments.

Insurance company insolvencies in states where the Company writes business may result in guaranty fund assessments on future premiums. These assessments will be recorded as future premiums are written.

The Company accrues for guaranty fund and other assessments. During 2018, all accruals were paid prior to year end and the Company had no related premium tax benefit asset. The amount recorded represents management's best estimates based on assessment rate information received from the states in which the Company writes business and the direct premiums written in those states.

- C. Gain Contingencies - Not applicable.
- D. Claims Related Extra Contractual Obligation and Bad Faith Losses Stemming from Lawsuits - The Company has not identified any contractual obligations or alleged bad faith losses that could have a material impact on the reported financial results.
- E. Product Warranties - Not applicable.
- F. Joint and Several Liabilities - Not applicable.
- G. All Other Contingencies

In the normal course of its business operations, the Company is involved in litigation with claimants and others. Those actions are considered by the Company in estimating the loss and loss adjustment expense reserves. The Company's management believes that the resolution of those actions will not have a material effect on the Company's financial position or results of operations.

Uncollectible Premiums Receivable - At December 31, 2018 and 2017, the Company had admitted assets of \$79,170,602 and \$90,643,036, respectively, in premiums receivable due from policyholders. The Company routinely assesses the collectability of these receivables. Based upon company experience, any uncollectible premiums receivable as of December 31, 2018 are not expected to exceed the nonadmitted amounts totaling \$0 and, therefore, no additional provision for uncollectible amounts has been recorded. The potential for any additional loss is not believed to be material to the Company's financial condition.

Note 15 – Leases

- A. Lessee Operating Lease

On December 16, 2004, the Company sold its office building for \$18,000,000. Concurrent with the sale, the Company leased the property back for a period of ten years. October 1, 2012 the Company amended the lease agreement which extended the lease term until December 31, 2024. The rent is \$1,227,012 for the first 57 months and incremental changes each year thereafter. The lease is renewable at the Company's option for an additional six successive terms of five years each. The Company parent, Ameriprise, provided a guarantee of the Company's payments under the subsequent lease. As a result of the parental guarantee, the Company did not meet the requirements of sales/leaseback accounting due to a continuing involvement. Accordingly, the transaction has been recorded as a financing transaction rather than as a sale, and the building and related accounts will continue to be recognized in the accompanying financial statements.

The future minimum lease payments under the terms of the related lease agreement are as follows:

Year Ending December 31	Lease Payments
2019	\$1,265,741
2020	\$1,281,563
2021	\$1,297,582
2022	\$1,313,802
2023	\$1,330,224
2024	\$1,346,852

The Company has an office space lease in Phoenix, Arizona for a satellite office that commenced on October 1, 2005 and as amended in 2013, expires on November 30, 2019. The rental expense was \$656,566 and \$630,111 in 2018 and 2017, respectively. The Second Amendment of the lease is renewable at the Company's option for one additional period of five years. The future minimum lease payments under the terms of the related lease agreement are as follows:

Year Ending December 31	Lease Payments
2019	\$708,062

- B. Lessor Leases - Not applicable

Note 16 – Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk

- Face or Contracts Amounts - The Company has no financial instruments with off-balance sheet risk.
- Nature and Terms of Off-Balance Sheet Risk - The Company has no financial instruments with off-balance sheet risk or concentrations of credit risk.
- Amount of Loss if any Party to the Financial Instrument Failed - The Company has no exposure to credit related losses.

NOTES TO FINANCIAL STATEMENTS

4. Collateral or Other Security Required to Support Financial Instrument - The Company holds no collateral.

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

- A. Transfers of Receivables Reported as Sales - Not applicable.
 B. Transfer and Servicing of Financial Assets - Not applicable.
 C. Wash Sales - Not applicable.

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

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

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

The Company does not have any direct written premium produced by managing general agents or third party administrators that exceeds 5% of policyholders' surplus.

Note 20 – Fair Value Measurements

- A. Fair Value Measurements

- (1) Fair Value Measurements at December 31, 2018:

Description for Each Type of Asset or Liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Assets at Fair Value					
Bonds: U.S. Special Revenue	\$	\$ 2,029,766	\$	\$	\$ 2,029,766
Total	\$	\$ 2,029,766	\$	\$	\$ 2,029,766
Liabilities at Fair Value					
	\$	\$	\$	\$	\$
Total	\$	\$	\$	\$	\$

Bonds

When available, fair value is based on quoted prices in active markets. If quoted prices are not available, fair values are obtained from third party pricing services, non-binding broker quotes or other model-based valuation techniques. Level 2 securities include municipal bonds. The fair value of these Level 2 securities is based on a market approach with prices obtained from third party pricing services. Observable inputs used to value these securities can include, but are not limited to, reported trades, benchmark yields, issuer spreads and non-binding broker quotes.

- (2) Fair Value Measurements in (Level 3) of the Fair Value Hierarchy - The Company has no assets or liabilities measured at fair value in the Level 3 category as of December 31, 2018.
 (3) Policies when Transfers Between Levels are Recognized - The Company recognizes transfers between levels of the fair value hierarchy as of the beginning of the quarter in which each transfer occurred.
 (4) Description of Valuation Techniques and Inputs Used in Fair Value Measurement - The Company categorizes its fair value measurements according to a three-level hierarchy. The hierarchy prioritizes the inputs used by the Company's valuation techniques. A level is assigned to each fair value measurement based on the lowest level input that is significant to the fair value measurement in its entirety. The three levels of the fair value hierarchy are defined as follows:

Level 1	Unadjusted quoted prices for identical assets or liabilities in active markets that are accessible at the measurement date.
Level 2	Prices or valuations based on observable inputs other than quoted prices in active markets for identical assets and liabilities.
Level 3	Prices or valuations that require inputs that are both significant to the fair value measurement and unobservable.

The Company uses valuation techniques consistent with the market and income approaches to measure the fair value of its assets and liabilities. The Company's market approach uses prices and other relevant information generated by market transactions involving identical or comparable assets or liabilities. The Company's income approach uses valuation techniques to convert future projected cash flows to a single discounted present value amount. When applying either approach, the Company maximizes the use of observable inputs and minimizes the use of unobservable inputs.

- (5) Fair Value Disclosures - The Company does not have any derivative assets or liabilities as of December 31, 2018.

- B. Fair Value Reporting under SSAP 100 and Other Accounting Pronouncements - See Notes 1 and 5

- C. The following table provides the carrying value and the estimated fair value of financial instruments that are not reported at fair value as of December 31, 2018:

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$1,571,731,793	\$1,556,871,253	\$ 4,703,354	\$1,557,028,439	\$ 10,000,000	\$	\$
Cash equivalents	\$ 53,085,091	\$ 53,085,091	\$	\$ 53,085,091	\$	\$	\$
Mortgage loans	\$ 35,135,381	\$ 36,116,877	\$	\$	\$ 35,135,381	\$	\$

Bonds

When available, fair value is based on quoted prices in active markets. If quoted prices are not available, fair values are obtained from third party pricing services, non-binding broker quotes or other model-based valuation techniques. Level 1 securities include U.S. Treasury securities. Level 2 securities include municipal and corporate bonds, U.S. government agency residential mortgage backed securities, non-agency commercial mortgage backed securities and asset backed securities. The fair value of these Level 2 securities is based on a market approach with prices obtained from third party pricing services. Observable inputs used to value these securities can include, but are not limited to, reported trades, benchmark yields, issuer spreads and non-binding broker quotes. Level 3 securities include a non-agency residential mortgage backed security. The fair value of this Level 3 security is based on a single non-binding broker quote. The underlying inputs used for some of the non-binding broker quotes are not readily available to the Company.

NOTES TO FINANCIAL STATEMENTSCash equivalents

Cash equivalents include highly liquid investments with original maturities of three months or less. Cash equivalents are classified as Level 2 and measured at amortized cost, which is a reasonable estimate of fair value because of the short time between the purchase of the instrument and its expected realization.

Mortgage loans on real estate

The fair value of commercial mortgage loans, except those with significant credit deterioration is determined by discounting contractual cash flows using discount rates that reflect current pricing for loans with similar remaining maturities, liquidity and characteristics including loan-to-value ratio, occupancy rate, refinance risk, debt-service coverage, location, and property condition. For commercial mortgage loans with significant credit deterioration, fair value is determined using the same adjustments as above with an additional adjustment for the Company's estimate of the amount recoverable on the loan. Given the significant unobservable inputs to this valuation, these measurements are classified as Level 3.

D. Not Practicable to Estimate Fair Value - Not applicable.

E. NAV Practical Expedient Investments - Not applicable.

Note 21 – Other Items

A. Unusual or Infrequent Items - Not applicable.

B. Troubled Debt Restructuring Debtors - Not applicable.

C. Other Disclosures - Assets in the amount of \$4,499,657 and \$4,521,547 at December 31, 2018 and 2017 respectively, were on deposit with government authorities as required by law.

D. Business Interruption Insurance Recoveries- The Company did not have any business interruption insurance recoveries.

E. State Transferable and Non-Transferable Tax Credits - Not applicable.

F. Subprime Mortgage Related Risk Exposure

(1) Sub-prime mortgage lending is the origination of residential mortgage loans to customers with weak credit profiles. Alt-A mortgage lending is the origination of residential mortgage loans to customers who have credit ratings above sub-prime but may not conform to government-sponsored standards. Prime mortgage lending is the origination of residential mortgage loans to customers with good credit profiles. The Company has exposure to prime and Alt-A types of loans predominantly through mortgage backed and asset backed securities. The slowdown in the U.S. housing market, combined with relaxed underwriting standards by some originators, has led to higher delinquency and loss rates for some of these investments. Market conditions have increased the likelihood of other-than-temporary impairments for certain non-agency residential mortgage backed securities. As a part of the Company's risk management process, an internal rating system is used in conjunction with market data as the basis of analysis to assess the likelihood that the Company will not receive all contractual principal and interest payments for these investments. For the investments that are more at risk for impairment, the Company performs its own assessment of projected cash flows incorporating assumptions about default rates, prepayment speeds and loss severity to determine if an other-than-temporary impairment should be recognized.

(2) There is no direct exposure to subprime mortgage loans.

(3) The Company has no exposure to securities with underlying subprime exposure as of December 31, 2018.

Securities with underlying Alt-A exposure, as of December 31, 2018:

	Actual Cost	Book/Adjusted Carrying Value (Excluding Interest)	Fair Value	Other-Than-Temporary Impairment Losses Recognized
a. Residential mortgage backed securities	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$
b. Commercial mortgage backed securities				
c. Collateralized debt obligations				
d. Structured securities				
e. Equity investments in SCAs*				
f. Other assets				
g. Total	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000	\$

* These investments comprise % of the company's invested assets.

(4) There is no underwriting exposure to subprime mortgage risk.

G. Insurance-Linked Securities (ILS) Contracts - Not applicable.

Note 22 – Events Subsequent

The Company has evaluated events or transactions that may have occurred since December 31, 2018, that would merit recognition or disclosure in the financial statements. The Company is not aware of any events subsequent to December 31, 2018, which would materially affect its financial condition. This evaluation was completed through February 5, 2019, the date the financial statements were available to be issued.

A. Did the reporting entity write accident and health insurance premium that is subject to Section 9010 of the Federal Affordable Care Act (YES/NO)?

Yes [] No [X]

	2018	2017
B. ACA fee assessment payable for the upcoming year	\$	\$
C. ACA fee assessment paid	\$	\$
D. Premium written subject to ACA 9010 assessment	\$	\$
E. Total adjusted capital before surplus adjustment (Five-Year Historical Line 28)	\$ 789,281,373	
F. Total adjusted capital after surplus adjustment (Five-Year Historical Line 28 minus 22B above)	\$ 789,281,373	
G. Authorized control level (Five-Year Historical Line 29)	\$ 69,993,171	

NOTES TO FINANCIAL STATEMENTS

- H. Would reporting the ACA assessment as of December 31, 2018 have triggered an RBC action level (YES/NO)? Yes [] No [X]

Note 23 – Reinsurance

- A. Unsecured Reinsurance Recoverables - The Company does not have any unsecured aggregate recoverable for losses, paid and unpaid including IBNR, loss adjustment expenses and unearned premium with any individual reinsurers, authorized or unauthorized, that exceeds 3% of the Company policyholder surplus.
- B. Reinsurance Recoverable in Dispute - The Company does not have any reinsurance recoverable on paid and unpaid losses, including IBNR that is in dispute of payment by the participating reinsurer that exceed 5% of policyholders' surplus from an individual reinsurer or exceed 10% of policyholders' surplus in aggregate.
- C. Reinsurance Assumed and Ceded

(1) Maximum Amount of Return Commission

	Assumed Reinsurance		Ceded Reinsurance		Net	
	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity
a. Affiliates	\$ 8,084,223	\$	\$	\$	\$ 8,084,223	\$
b. All Other			11,892,100		(11,892,100)	
c. Total	\$ 8,084,223	\$	\$ 11,892,100	\$	\$ (3,807,877)	\$

d. Direct Unearned Premium Reserves	\$ 341,666,458
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(2) Additional or Return Commission

	Direct	Assumed	Ceded	Net
a. Contingent commission	\$	\$	\$	\$
b. Sliding scale adjustments			5,507,750	(5,507,750)
c. Other profit commission arrangements				
d. Total	\$	\$	\$ 5,507,750	\$ (5,507,750)

- (3) Types of Risks Attributed to Protected Cell The Company does not use protective cells as an alternative to traditional reinsurance.
- D. Uncollectible Reinsurance - The Company has not written off any uncollectible reinsurance during the course of the current calendar year.
- E. Commutation of Ceded Reinsurance - The Company had no commutation of ceded reinsurance during the course of the current calendar year.
- F. Retroactive Reinsurance - Not applicable.
- G. Reinsurance Accounted for as a Deposit - Not applicable.
- H. Disclosures for the Transfer of Property and Casualty Run-off Agreements - Not applicable.
- I. Certified Reinsurer Rating Downgraded or Status Subject to Revocation - The Company did not have any certified reinsurers downgraded.
- J. Reinsurance Agreements Qualifying for Reinsurer Aggregation - Not applicable.

Note 24 – Retrospectively Rated Contracts and Contracts Subject to Redetermination

- A-F. The Company is not involved in any retrospectively rated contracts or contracts subject to redetermination.

Note 25 – Change in Incurred Losses and Loss Adjustment Expenses

- A. Reserves at December 31, 2018 decreased approximately \$7.2 million from prior year end reflecting improved current year loss performance.

	2018	2017
Balance as of January 1 (in 000)	\$ 611,234	\$ 614,059
Add provision for claims occurring in:		
Current year	\$ 921,958	\$ 907,472
Prior years	(2,026)	8,768
Net incurred losses during current year	\$ 919,932	\$ 916,240
Deduct paid claims, net of reinsurance, occurring in:		
Current year	\$ 604,797	\$ 594,067
Prior years	322,377	324,997
Net paid claims during current year	927,174	919,064
Balance as of December 31	\$ 603,992	\$ 611,234

The prior year development was primarily due to favorable FL Hurricane CAT Fund recoveries and favorable updated estimates for prior year catastrophes recognized in 2018 along with slight increase in specific non-cat claims. The company entered into an agreement for the sale of subrogation rights of the claims related to the 2017 and 2018 California wildfires.

- B. Information about Significant Changes in Methodologies and Assumptions - There were no significant changes in methodologies and assumptions in the current calendar year.

Note 26 – Intercompany Pooling Arrangements

- A-G. The Company was not involved in any inter-company pooling arrangements during the statement period.

Note 27 – Structured Settlements

NOTES TO FINANCIAL STATEMENTS

A. Reserves No Longer Carried - Not applicable.

B. Annuities Which Equal or Exceed 1% of Policyholders' Surplus - Not applicable.

Note 28 – Health Care Receivables

A-B. The Company has no health care receivables.

Note 29 – Participating Policies

The Company has no participating accident and health policies.

Note 30 – Premium Deficiency Reserves

The Company evaluated the need to record a premium deficiency reserve as of the end of the current year and no reserve was required. The Company does not anticipate investment income when evaluating the need for premium deficiency reserves.

Note 31 – High Deductibles

A-B. The Company had no reserve credits recorded at the end of the reporting period for unpaid claims with high deductibles.

Note 32 – Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

A-C. The Company does not discount unpaid losses or unpaid loss adjustment expenses for financial reporting.

Note 33 – Asbestos/Environmental Reserves

A-F. The Company has no expense for asbestos and/or environmental claims.

Note 34 – Subscriber Savings Accounts

A. The Company is not a reciprocal insurance company.

Note 35 – Multiple Peril Crop Insurance

Not applicable.

Note 36 – Financial Guaranty Insurance

A-B. The Company has no financial guaranty insurance premiums, earnings or obligations.

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

- 1.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes No
 If yes, complete Schedule Y, Parts 1, 1A and 2.
- 1.2 If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations? Yes No N/A
- 1.3 State regulating? Wisconsin
- 1.4 Is the reporting entity publicly traded or a member of publicly traded group? Yes No
- 1.5 If the response to 1.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group. 820027
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes No
- 2.2 If yes, date of change: 12/31/2013
- 3.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2013
- 3.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released. 12/31/2013
- 3.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). 02/20/2015
- 3.4 By what department or departments?
State of Wisconsin Office of the Commissioner of Insurance
- 3.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with departments? Yes No N/A
- 3.6 Have all of the recommendations within the latest financial examination report been complied with? Yes No N/A
- 4.1 During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity) receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
- 4.11 sales of new business? Yes No
- 4.12 renewals? Yes No
- 4.2 During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
- 4.21 sales of new business? Yes No
- 4.22 renewals? Yes No
- 5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?
 If the answer is YES, complete and file the merger history data file with the NAIC. Yes No
- 5.2 If yes, provide the name of 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

- 6.1 Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? Yes No
- 6.2 If yes, give full information:
- 7.1 Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity? Yes No
- 7.2 If yes,
- 7.21 State the percentage of foreign control _____ %
- 7.22 State the nationality(s) of the foreign person(s) or entity(s); or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact and identify the type of entity(s) (e.g., individual, corporation, government, manager or attorney-in-fact).

1 Nationality	2 Type of Entity

- 8.1 Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board? Yes No
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.
- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes No
- 8.4 If the response to 8.3 is yes, please provide below the names and locations (city and state of the main office) of any affiliates regulated by a federal financial regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

1 Affiliate Name	2 Location (City, State)	3 FRB	4 OCC	5 FDIC	6 SEC
Ameriprise Enterprise Investment Services, Inc.	Minneapolis, MN				YES
Lionstone Partners, LLC	Houston, TX				YES
Ameriprise Certificate Company	Minneapolis, MN				YES
Ameriprise Financial Services, Inc.	Minneapolis, MN				YES
Ameriprise Financial, Inc.	Minneapolis, MN				YES
Columbia Wanger Asset Management, LLC.	Chicago, IL				YES
RiverSource Distributors, Inc.	Minneapolis, MN				YES
Columbia Management Investment Advisers, LLC.	Boston, MA				YES
Columbia Management Investment Services, Co.	Boston, MA				YES
J. & W. Seligman & Co. Incorporated	New York, NY				YES

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

Columbia Management Investment Distributors, Inc.	New York, NY				YES
Riversource Life Insurance Company	Minneapolis, MN				YES
Ameriprise National Trust Bank	Minneapolis, MN		YES		

9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?
PricewaterhouseCoopers LLP, Milwaukee, WI
- 10.1 Has the insurer been granted any exemptions to the prohibited non-audit services provided by the certified independent public accountant requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation? Yes [] No [X]
- 10.2 If the response to 10.1 is yes, provide information related to this exemption:
- 10.3 Has the insurer been granted any exemptions related to other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 18A of the Model Regulation, or substantially similar state law or regulation? Yes [] No [X]
- 10.4 If the response to 10.3 is yes, provide information related to this exemption:
- 10.5 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? Yes [X] No [] N/A []
- 10.6 If the response to 10.5 is no or n/a, please explain:
11. What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?
Christopher P. Walker, Principal, PricewaterhouseCoopers LLP, Chicago, IL
- 12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? Yes [] No [X]
- 12.11 Name of real estate holding company
- 12.12 Number of parcels involved 0
- 12.13 Total book/adjusted carrying value \$ 0
- 12.2 If yes, provide explanation

13. FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:

- 13.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?
- 13.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? Yes [] No []
- 13.3 Have there been any changes made to any of the trust indentures during the year? Yes [] No []
- 13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? Yes [] No [] N/A []
- 14.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? 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.
- 14.11 If the response to 14.1 is no, please explain:
- 14.2 Has the code of ethics for senior managers been amended? Yes [] No [X]
- 14.21 If the response to 14.2 is yes, provide information related to amendment(s).
- 14.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes [] No [X]
- 14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).

- 15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance where the issuing or confirming bank is not on the SVO Bank List? Yes [] No [X]
- 15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

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

BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the Board of Directors or a subordinator committee thereof? Yes [X] No []
17. Does the reporting entity keep a complete permanent record of the proceedings of its Board of Directors and all subordinate committees thereof? Yes [X] No []
18. Has the reporting entity an established procedure for disclosure to its Board of Directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict or is likely to conflict with the official duties of such person? Yes [X] No []

FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? Yes [] No [X]
- 20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):
- 20.11 To directors or other officers \$ 0
- 20.12 To stockholders not officers \$ 0
- 20.13 Trustees, supreme or grand (Fraternal only) \$ 0
- 20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):
- 20.21 To directors or other officers \$ 0
- 20.22 To stockholders not officers 0
- 20.23 Trustees, supreme or grand (Fraternal only) 0
- 21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reporting in the statement? Yes [] No [X]
- 21.2 If yes, state the amount thereof at December 31 of the current year:

GENERAL INTERROGATORIES**PART 1 - COMMON INTERROGATORIES**

21.21	Rented from others	\$	0
21.22	Borrowed from others	\$	0
21.23	Leased from others	\$	0
21.24	Other	\$	0
22.1	Does this statement include payments for assessments as described in the <i>Annual Statement Instructions</i> other than guaranty fund or guaranty association assessments?		Yes [] No [X]
22.2	If answer is yes:		
22.21	Amount paid as losses or risk adjustment	\$	0
22.22	Amount paid as expenses	\$	0
22.23	Other amounts paid	\$	0
23.1	Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement?		Yes [X] No []
23.2	If yes, indicate any amounts receivable from parent included in the Page 2 amount:	\$	2,864,104

INVESTMENT

24.01	Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date (other than securities lending programs addressed in 24.03)?		Yes [X] No []					
24.02	If no, give full and complete information, relating thereto:							
24.03	For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet (an alternative is to reference Note 17 where this information is also provided).							
24.04	Does the company's security lending program meet the requirements for a conforming program as outlined in the <i>Risk-Based Capital Instructions</i> ?	Yes [] No [] N/A [X]						
24.05	If answer to 24.04 is yes, report amount of collateral for conforming programs.	\$	0					
24.06	If answer to 24.04 is no, report amount of collateral for other programs	\$	0					
24.07	Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract?	Yes [] No [] N/A [X]						
24.08	Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%?	Yes [] No [] N/A [X]						
24.09	Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities Lending Agreement (MSLA) to conduct securities lending?	Yes [] No [] N/A [X]						
24.10	For the reporting entity's security lending program, state the amount of the following as of December 31 of the current year:							
24.101	Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2:	\$	0					
24.102	Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2:	\$	0					
24.103	Total payable for securities lending reported on the liability page:	\$	0					
25.1	Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity or has the reporting entity sold or transferred any assets subject to a put option contract that is current in force? (Exclude securities subject to Interrogatory 21.1 and 24.03.)		Yes [X] No []					
25.2	If yes, state the amount thereof at December 31 of the current year:							
25.21	Subject to repurchase agreements	\$	0					
25.22	Subject to reverse repurchase agreements	\$	0					
25.23	Subject to dollar repurchase agreements	\$	0					
25.24	Subject to reverse dollar repurchase agreements	\$	0					
25.25	Placed under option agreements	\$	0					
25.26	Letter stock or securities restricted as sale – excluding FHLB Capital Stock	\$	0					
25.27	FHLB Capital Stock	\$	0					
25.28	On deposit with states	\$	4,499,657					
25.29	On deposit with other regulatory bodies	\$	0					
25.30	Pledged as collateral – excluding collateral pledged to an FHLB	\$	0					
25.31	Pledged as collateral to FHLB – including assets backing funding agreements	\$	0					
25.32	Other	\$	0					
25.3	For category (25.26) provide the following:							
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">1 Nature of Restriction</th> <th style="width: 33%;">2 Description</th> <th style="width: 33%;">3 Amount</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td style="text-align: right;">\$</td> </tr> </tbody> </table>	1 Nature of Restriction	2 Description	3 Amount			\$	
1 Nature of Restriction	2 Description	3 Amount						
		\$						
26.1	Does the reporting entity have any hedging transactions reported on Schedule DB?		Yes [] No [X]					
26.2	If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? If no, attach a description with this statement.	Yes [] No [] N/A [X]						
27.1	Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into equity, or, at the option of the issuer, convertible into equity?		Yes [] No [X]					
27.2	If yes, state the amount thereof at December 31 of the current year:	\$	0					
28.	Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC <i>Financial Condition Examiners Handbook</i> ?		Yes [X] No []					
28.01	For agreements that comply with the requirements of the NAIC <i>Financial Condition Examiners Handbook</i> , complete the following:							
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">1 Name of Custodian(s)</th> <th style="width: 50%;">2 Custodian's Address</th> </tr> </thead> <tbody> <tr> <td>JP Morgan</td> <td>New York, NY</td> </tr> </tbody> </table>	1 Name of Custodian(s)	2 Custodian's Address	JP Morgan	New York, NY			
1 Name of Custodian(s)	2 Custodian's Address							
JP Morgan	New York, NY							
28.02	For all agreements that do not comply with the requirements of the NAIC <i>Financial Condition Examiners Handbook</i> , provide the name, location and a complete explanation							
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">1 Name(s)</th> <th style="width: 33%;">2 Location(s)</th> <th style="width: 33%;">3 Complete Explanation(s)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	1 Name(s)	2 Location(s)	3 Complete Explanation(s)				
1 Name(s)	2 Location(s)	3 Complete Explanation(s)						

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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

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

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

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

1 Name of Firm or Individual	2 Affiliation
Columbia Management Investment Advisors, LLC	A

28.0597 For those firms/individuals listed in the table for Question 28.05, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's assets? Yes [] No [X]

28.0598 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 28.05, does the total assets under management aggregate to more than 50% of the reporting entity's assets? Yes [] No [X]

28.06 For those firms or individuals listed in the table for 28.05 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1	2	3	4	5
Central Registration Depository Number	Name of Firm or Individual	Legal Entity Identifier (LEI)	Registered With	Investment Management Agreement (IMA) Filed
108257	Columbia Management Investment Advisors, LLC	6YVO3HOUHJXER5SGR23	SEC	DS

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

29.2 If yes, complete the following schedule:

1 CUSIP	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
		\$
29.2999 TOTAL		\$

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

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

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

		1 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
30.1	Bonds	\$ 1,611,986,109	\$ 1,626,846,650	\$ 14,860,541
30.2	Preferred Stocks	\$ 0	\$ 0	\$ 0
30.3	Totals	\$ 1,611,986,109	\$ 1,626,846,650	\$ 14,860,541

30.4 Describe the sources or methods utilized in determining the fair values:

The fair value of bonds is based on quoted prices in active markets. If quoted prices are not available, fair values are obtained from nationally recognized pricing services, broker quotes or other model-based valuation techniques.

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

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

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

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

32.2 If no, list exceptions:

33. By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designation 5GI security:

- a. Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
- b. Issuer or obligor is current on all contracted interest and principal payments.
- c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

Has the reporting entity self-designated 5GI securities? Yes [X] No []

34. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:

- a. The security was purchased prior to January 1, 2018.
- b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
- c. The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as an NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
- d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

Has the reporting entity self-designated PLGI securities? Yes [] No [X]

OTHER

35.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any? \$ 3,483,193

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

35.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
ISO	\$ 2,926,384

36.1 Amount of payments for legal expenses, if any?

\$ 29,213

36.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
Baker & Mckenzie LLP	\$ 21,130

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

\$ 0

37.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
	\$

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

1.1	Does the reporting entity have any direct Medicare Supplement Insurance in force?			Yes []	No [X]
1.2	If yes, indicate premium earned on U.S. business only.	\$			0
1.3	What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit?	\$			0
1.31	Reason for excluding:				
1.4	Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above.	\$			0
1.5	Indicate total incurred claims on all Medicare Supplement insurance.	\$			0
1.6	Individual policies:				
	Most current three years:				
1.61	Total premium earned	\$			0
1.62	Total incurred claims	\$			0
1.63	Number of covered lives				0
	All years prior to most current three years:				
1.64	Total premium earned	\$			0
1.65	Total incurred claims	\$			0
1.66	Number of covered lives				0
1.7	Group policies:				
	Most current three years:				
1.71	Total premium earned	\$			0
1.72	Total incurred claims	\$			0
1.73	Number of covered lives				0
	All years prior to most current three years:				
1.74	Total premium earned	\$			0
1.75	Total incurred claims	\$			0
1.76	Number of covered lives				0
2.	Health Test:				
			1	2	
			Current Year	Prior Year	
2.1	Premium Numerator	\$	0	0	
2.2	Premium Denominator	\$	1,042,385,913	993,344,234	
2.3	Premium Ratio (2.1/2.2)		0.0%	0.0%	
2.4	Reserve Numerator	\$	0	0	
2.5	Reserve Denominator	\$	941,851,081	933,415,808	
2.6	Reserve Ratio (2.4/2.5)		0.0%	0.0%	
3.1	Does the reporting entity issue both participating and non-participating policies?				Yes [] No [X]
3.2	If yes, state the amount of calendar year premiums written on:				
3.21	Participating policies	\$			0
3.22	Non-participating policies	\$			0
4.	FOR MUTUAL REPORTING ENTITIES AND RECIPROCAL EXCHANGES ONLY:				
4.1	Does the reporting entity issue assessable policies?				Yes [] No []
4.2	Does the reporting entity issue non-assessable policies?				Yes [] No []
4.3	If assessable policies are issued, what is the extent of the contingent liability of the policyholders?				%
4.4	Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums.	\$			0
5.	FOR RECIPROCAL EXCHANGES ONLY:				
5.1	Does the exchange appoint local agents?				Yes [] No []
5.2	If yes, is the commission paid:				
5.21	Out of Attorney's-in-fact compensation				Yes [] No [] N/A []
5.22	As a direct expense of the exchange				Yes [] No [] N/A []
5.3	What expenses of the exchange are not paid out of the compensation of the Attorney-in-fact?				
5.4	Has any Attorney-in-fact compensation, contingent on fulfillment of certain conditions, been deferred?				Yes [] No []
5.5	If yes, give full information:				
6.1	What provision has this reporting entity made to protect itself from an excessive loss in the event of a catastrophe under a workers' compensation contract issued without limit of loss?				
6.2	Describe the method used to estimate this reporting entity's probable maximum insurance loss, and identify the type of insured exposures comprising that probable maximum loss, the locations of concentrations of those exposures and the external resources (such as consulting firms or computer software models), if any, used in the estimation process:				
6.3	What provision has this reporting entity made (such as catastrophic reinsurance program) to protect itself from an excessive loss arising from the types and concentrations of insured exposures comprising its probable maximum property insurance loss?				
6.4	Does the reporting entity carry catastrophe reinsurance protection for at least one reinstatement, in an amount sufficient to cover its estimated probable maximum loss attributable to a single loss event or occurrence?				Yes [X] No []
6.5	If no, describe any arrangements or mechanisms employed by the reporting entity to supplement its catastrophe reinsurance program or to hedge its exposure to uninsured catastrophic loss:				
7.1	Has the reporting entity reinsured any risk with any other entity under a quota share reinsurance contract that includes a provision that would limit the reinsurer's losses below the stated quota share percentage (e.g., a deductible, a loss ratio corridor, a loss cap, an aggregate limit or any similar provisions)?				Yes [] No [X]

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

7.2	If yes, indicate the number of reinsurance contracts containing such provisions.	0
7.3	If yes, does the amount of reinsurance credit taken reflect the reduction in quota share coverage caused by any applicable limiting provision(s)?	Yes [] No []
8.1	Has this reporting entity reinsured any risk with any other entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on this risk, or portion thereof, reinsured?	Yes [] No [X]
8.2	If yes, give full information	
9.1	Has the reporting entity ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates) for which during the period covered by the statement: (i) it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; (ii) it accounted for that contract as reinsurance and not as a deposit; and (iii) the contract(s) contain one or more of the following features or other features that would have similar results: (a) A contract term longer than two years and the contract is noncancellable by the reporting entity during the contract term; (b) A limited or conditional cancellation provision under which cancellation triggers an obligation by the reporting entity, or an affiliate of the reporting entity, to enter into a new reinsurance contract with the reinsurer, or an affiliate of the reinsurer; (c) Aggregate stop loss reinsurance coverage; (d) A unilateral right by either party (or both parties) to commute the reinsurance contract, whether conditional or not, except for such provisions which are only triggered by a decline in the credit status of the other party; (e) A provision permitting reporting of losses, or payment of losses, less frequently than on a quarterly basis (unless there is no activity during the period); or (f) Payment schedule, accumulating retentions from multiple years or any features inherently designed to delay timing of the reimbursement to the ceding entity?	Yes [] No [X]
9.2	Has the reporting entity during the period covered by the statement ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates), for which, during the period covered by the statement, it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; excluding cessions to approved pooling arrangements or to captive insurance companies that are directly or indirectly controlling, controlled by, or under common control with (i) one or more unaffiliated policyholders of the reporting entity, or (ii) an association of which one or more unaffiliated policyholders of the reporting entity is a member where: (a) The written premium ceded to the reinsurer by the reporting entity or its affiliates represents fifty percent (50%) or more of the entire direct and assumed premium written by the reinsurer based on its most recently available financial statement; or (b) Twenty-five percent (25%) or more of the written premium ceded to the reinsurer has been retroceded back to the reporting entity or its affiliates in a separate reinsurance contract.	Yes [] No [X]
9.3	If yes to 9.1 or 9.2, please provide the following information in the Reinsurance Summary Supplemental Filing for General Interrogatory 9: (a) The aggregate financial statement impact gross of all such ceded reinsurance contracts on the balance sheet and statement of income; (b) A summary of the reinsurance contract terms and indicate whether it applies to the contracts meeting the criteria in 9.1 or 9.2; and (c) A brief discussion of management's principle objectives in entering into the reinsurance contract including the economic purpose to be achieved.	
9.4	Except for transactions meeting the requirements of paragraph 31 of <i>SSAP No. 62R, Property and Casualty Reinsurance</i> , has the reporting entity ceded any risk under any reinsurance contract (or multiple contracts with the same reinsurer or its affiliates) during the period covered by the financial statement, and either: (a) Accounted for that contract as reinsurance (either prospective or retroactive) under statutory accounting principles ("SAP") and as a deposit under generally accepted accounting principles ("GAAP"); or (b) Accounted for that contract as reinsurance under GAAP and as a deposit under SAP?	Yes [] No [X]
9.5	If yes to 9.4, explain in the Reinsurance Summary Supplemental Filing for General Interrogatory 9 (Section D) why the contract(s) is treated differently for GAAP and SAP.	
9.6	The reporting entity is exempt from the Reinsurance Attestation Supplement under one or more of the following criteria: (a) The entity does not utilize reinsurance; or, (b) The entity only engages in a 100% quota share contract with an affiliate and the affiliated or lead company has filed an attestation supplement; or (c) The entity has no external cessions and only participates in an intercompany pool and the affiliated or lead company has filed an attestation supplement.	Yes [] No [X] Yes [] No [X] Yes [] No [X]
10.	If the reporting entity has assumed risks from another entity, there should be charged on account of such reinsurances a reserve equal to that which the original entity would have been required to charge had it retained the risks. Has this been done?	Yes [X] No [] N/A []
11.1	Has the reporting entity guaranteed policies issued by any other entity and now in force?	Yes [] No [X]
11.2	If yes, give full information	
12.1	If the reporting entity recorded accrued retrospective premiums on insurance contracts on Line 15.3 of the assets schedule, Page 2, state the amount of corresponding liabilities recorded for: 12.11 Unpaid losses 12.12 Unpaid underwriting expenses (including loss adjustment expenses)	\$ 0 \$ 0
12.2	Of the amount on Line 15.3, Page 2, state the amount that is secured by letters of credit, collateral and other funds?	\$ 0
12.3	If the reporting entity underwrites commercial insurance risks, such as workers' compensation, are premium notes or promissory notes accepted from its insureds covering unpaid premiums and/or unpaid losses?	Yes [] No [] N/A [X]
12.4	If yes, provide the range of interest rates charged under such notes during the period covered by this statement: 12.41 From 12.42 To	% %
12.5	Are letters of credit or collateral and other funds received from insureds being utilized by the reporting entity to secure premium notes or promissory notes taken by a reporting entity, or to secure any of the reporting entity's reported direct unpaid loss reserves, including unpaid losses under loss deductible features of commercial policies?	Yes [X] No []
12.6	If yes, state the amount thereof at December 31 of current year: 12.61 Letters of Credit 12.62 Collateral and other funds	\$ 27,607 \$ 0
13.1	Largest net aggregate amount insured in any one risk (excluding workers' compensation):	\$ 1,000,000
13.2	Does any reinsurance contract considered in the calculation of this amount include an aggregate limit of recovery without also including a reinstatement provision?	Yes [] No [X]
13.3	State the number of reinsurance contracts (excluding individual facultative risk certificates, but including facultative programs, automatic	0

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

facilities or facultative obligatory contracts) considered in the calculation of the amount.

14.1 Is the reporting entity a cedant in a multiple cedant reinsurance contract? Yes [] No [X]

14.2 If yes, please describe the method of allocating and recording reinsurance among the cedants:

14.3 If the answer to 14.1 is yes, are the methods described in item 14.2 entirely contained in the respective multiple cedant reinsurance contracts? Yes [] No []

14.4 If the answer to 14.3 is no, are all the methods described in 14.2 entirely contained in written agreements? Yes [] No []

14.5 If the answer to 14.4 is no, please explain:

15.1 Has the reporting entity guaranteed any financed premium accounts? Yes [] No [X]

15.2 If yes, give full information

16.1 Does the reporting entity write any warranty business? Yes [] No [X]

If yes, disclose the following information for each of the following types of warranty coverage:

	1	2	3	4	5
	Direct Losses Incurred	Direct Losses Unpaid	Direct Written Premium	Direct Premium Unearned	Direct Premium Earned
16.11 Home	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
16.12 Products	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
16.13 Automobile	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
16.14 Other*	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

* Disclose type of coverage:

17.1 Does the reporting entity include amounts recoverable on unauthorized reinsurance in Schedule F-Part 3 that is exempt from the statutory provision for unauthorized reinsurance? Yes [] No [X]

Incurred but not reported losses on contracts in force prior to July 1, 1984, and not subsequently renewed are exempt from the statutory provision for unauthorized reinsurance. Provide the following information for this exemption:

17.11 Gross amount of unauthorized reinsurance in Schedule F-Part 3 exempt from the statutory provision for unauthorized reinsurance	\$ 0
17.12 Unfunded portion of Interrogatory 17.11	\$ 0
17.13 Paid losses and loss adjustment expenses portion of Interrogatory 17.11	\$ 0
17.14 Case reserves portion of Interrogatory 17.11	\$ 0
17.15 Incurred but not reported portion of Interrogatory 17.11	\$ 0
17.16 Unearned premium portion of Interrogatory 17.11	\$ 0
17.17 Contingent commission portion of Interrogatory 17.11	\$ 0

18.1 Do you act as a custodian for health savings accounts? Yes [] No [X]

18.2 If yes, please provide the amount of custodial funds held as of the reporting date. \$ 0

18.3 Do you act as an administrator for health savings accounts? Yes [] No [X]

18.4 If yes, please provide the balance of the funds administered as of the reporting date. \$ 0

19. Is the reporting entity licensed or chartered, registered, qualified, eligible, or writing business in at least 2 states? Yes [X] No []

19.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? Yes [] No []

FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e. 17.6.

	1 2018	2 2017	3 2016	4 2015	5 2014
Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 & 3)					
1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	489,478,569	459,977,034	432,140,808	416,583,963	405,658,134
2. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	342,433,655	318,715,059	305,701,717	327,534,649	298,163,911
3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	280,819,991	349,890,371	347,047,451	343,061,692	314,332,419
4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....				552	1,713
5. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
6. Total (Line 35).....	1,112,732,215	1,128,582,464	1,084,889,976	1,087,180,856	1,018,156,177
Net Premiums Written (Page 8, Part 1B, Col. 6)					
7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	479,126,813	450,048,523	424,453,991	408,990,194	398,560,057
8. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	339,473,197	316,110,663	304,091,561	325,751,408	296,606,599
9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	239,463,110	191,196,682	336,707,523	333,488,995	305,772,239
10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....				552	1,713
11. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
12. Total (Line 35).....	1,058,063,120	957,355,868	1,065,253,075	1,068,231,149	1,000,940,608
Statement of Income (Page 4)					
13. Net underwriting gain (loss) (Line 8).....	(59,102,382)	(92,616,394)	(93,487,012)	(149,081,525)	(117,175,037)
14. Net investment gain (loss) (Line 11).....	58,251,259	57,706,667	58,870,248	56,956,516	54,639,887
15. Total other income (Line 15).....	2,587,084	2,594,714	2,673,958	3,978,968	4,137,895
16. Dividends to policyholders (Line 17).....					
17. Federal and foreign income taxes incurred (Line 19).....	(7,145,158)	(22,603,533)	(23,590,239)	(43,763,814)	(33,105,349)
18. Net income (Line 20).....	8,881,119	(9,711,480)	(8,352,567)	(44,382,227)	(25,291,906)
Balance Sheet Lines (Pages 2 and 3)					
19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3).....	1,798,130,662	1,789,935,270	1,826,317,319	1,661,810,013	1,414,322,994
20. Premiums and considerations (Page 2, Col. 3):					
20.1 In course of collection (Line 15.1).....	499,744	1,475,888	739,071	774,836	928,332
20.2 Deferred and not yet due (Line 15.2).....	78,670,858	89,167,149	89,234,743	94,919,841	87,882,236
20.3 Accrued retrospective premiums (Line 15.3).....					
21. Total liabilities excluding protected cell business (Page 3, Line 26).....	1,008,849,289	1,009,297,556	1,025,996,380	978,207,423	854,378,743
22. Losses (Page 3, Line 1).....	494,583,566	498,143,740	510,173,211	471,627,374	390,266,574
23. Loss adjustment expenses (Page 3, Line 3).....	109,408,928	113,090,688	103,885,420	97,151,600	82,751,586
24. Unearned premiums (Page 3, Line 9).....	337,858,587	322,181,380	358,169,745	366,797,606	341,964,042
25. Capital paid up (Page 3, Lines 30 & 31).....	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000
26. Surplus as regards policyholders (Page 3, Line 37).....	789,281,373	780,637,714	800,320,940	683,602,591	559,944,249
Cash Flow (Page 5)					
27. Net cash from operations (Line 11).....	32,806,962	(40,148,960)	69,242,114	68,625,402	66,465,964
Risk-Based Capital Analysis					
28. Total adjusted capital.....	789,281,373	780,637,714	800,320,940	683,602,591	559,944,249
29. Authorized control level risk-based capital.....	69,993,171	66,965,573	70,518,305	60,669,212	49,241,370
Percentage Distribution of Cash, Cash Equivalents and Invested Assets (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0					
30. Bonds (Line 1).....	94.4	96.3	94.5	96.3	98.6
31. Stocks (Lines 2.1 & 2.2).....	3.0	3.0	2.8	3.1	3.6
32. Mortgage loans on real estate (Lines 3.1 & 3.2).....	2.2	1.8	1.3	1.2	
33. Real estate (Lines 4.1, 4.2 & 4.3).....	0.1	0.1	(0.1)	(0.1)	(0.1)
34. Cash, cash equivalents and short-term investments (Line 5).....	0.3	(1.1)	1.5	(0.6)	(2.0)
35. Contract loans (Line 6).....					
36. Derivatives (Line 7).....					
37. Other invested assets (Line 8).....					
38. Receivables for securities (Line 9).....					
39. Securities lending reinvested collateral assets (Line 10).....					
40. Aggregate write-ins for invested assets (Line 11).....					
41. Cash, cash equivalents and invested assets (Line 12).....	100.0	100.0	100.0	100.0	100.0
Investments in Parent, Subsidiaries and Affiliates					
42. Affiliated bonds (Sch. D, Summary, Line 12, Col. 1).....					
43. Affiliated preferred stocks (Sch. D, Summary, Line 18, Col. 1).....					
44. Affiliated common stocks (Sch. D, Summary, Line 24, Col. 1).....	53,017,329	50,283,044	47,713,765	47,585,912	46,714,694
45. Affiliated short-term investments (subtotals included in Schedule DA, Verification, Column 5, Line 10).....					
46. Affiliated mortgage loans on real estate.....					
47. All other affiliated.....					
48. Total of above lines 42 to 47.....	53,017,329	50,283,044	47,713,765	47,585,912	46,714,694
49. Total investment in parent included in Lines 42 to 47 above.....					
50. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line 48 above divided by Page 3, Col. 1, Line 37 x 100.0).....	6.7	6.4	6.0	7.0	8.3

FIVE-YEAR HISTORICAL DATA

(Continued)

	1	2	3	4	5
	2018	2017	2016	2015	2014
Capital and Surplus Accounts (Page 4)					
51. Net unrealized capital gains (losses) (Line 24).....	2,614,366	2,569,279	127,852	871,218	3,513,238
52. Dividends to stockholders (Line 35).....					
53. Change in surplus as regards policyholders for the year (Line 38).....	8,643,659	(19,683,226)	116,718,349	123,658,341	29,230,566
Gross Losses Paid (Page 9, Part 2, Cols. 1 & 2)					
54. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	359,866,773	350,890,266	317,704,611	350,667,916	334,597,443
55. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	236,375,828	232,543,334	238,756,735	237,874,323	212,824,097
56. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	283,645,057	338,569,225	268,095,768	229,296,417	200,867,175
57. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....					
58. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
59. Total (Line 35).....	879,887,658	922,002,825	824,557,114	817,838,656	748,288,715
Net Losses Paid (Page 9, Part 2, Col. 4)					
60. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	350,670,787	342,017,355	311,740,578	341,173,646	329,617,969
61. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	235,843,359	229,038,011	238,706,737	237,802,142	212,647,238
62. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	210,107,606	227,689,404	266,500,973	228,987,692	195,410,355
63. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....					
64. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
65. Total (Line 35).....	796,621,752	798,744,770	816,948,288	807,963,480	737,675,562
Operating Percentages (Page 4) (Item divided by Page 4, Line 1) x 100.0					
66. Premiums earned (Line 1).....	100.0	100.0	100.0	100.0	100.0
67. Losses incurred (Line 2).....	76.1	79.2	79.7	85.2	83.5
68. Loss expenses incurred (Line 3).....	12.2	13.0	11.6	12.5	12.1
69. Other underwriting expenses incurred (Line 4).....	17.4	17.1	17.5	16.6	16.7
70. Net underwriting gain (loss) (Line 8).....	(5.7)	(9.3)	(8.7)	(14.3)	(12.3)
Other Percentages					
71. Other underwriting expenses to net premiums written (Page 4, Lines 4 + 5 - 15 divided by Page 8, Part 1B, Col. 6, Line 35 x 100.0).....	16.9	17.5	17.4	15.8	15.5
72. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0).....	88.3	92.2	91.2	97.7	95.6
73. Net premiums written to policyholders' surplus (Page 8, Part 1B, Col. 6, Line 35, divided by Page 3, Line 37, Col. 1 x 100.0).....	134.1	122.6	133.1	156.3	178.8
One Year Loss Development (\$000 omitted)					
74. Development in estimated losses and loss expenses incurred prior to current year (Schedule P, Part 2-Summary, Line 12, Col. 11).....	4,774	18,629	(13,694)	61,468	60,700
75. Percent of development of losses and loss expenses incurred to policyholders' surplus of prior year-end (Line 74 above divided by Page 4, Line 21, Col. 1 x 100).....	0.6	2.3	(2.0)	11.0	11.4
Two Year Loss Development (\$000 omitted)					
76. Development in estimated losses and loss expenses incurred 2 years before the current year and prior year (Schedule P, Part 2-Summary, Line 12, Col. 12).....	16,021	(5,587)	56,935	93,813	65,854
77. Percent of development of losses and loss expenses incurred to reported policyholders' surplus of second prior-year end (Line 76 above divided by Page 4, Line 21, Col. 2 x 100.0).....	2.0	(0.8)	10.2	17.7	14.2

If a party to a merger, have the two most recent years of this exhibit been restated due to a merger in compliance with the disclosure requirements of SSAP No. 3, Accounting Changes and Correction of Errors?

Yes [] No []

If no, please explain:

SCHEDULE P - ANALYSIS OF LOSSES AND LOSS EXPENSES**SCHEDULE P - PART 1 - SUMMARY**

(\$'000 Omitted)

Years in Which Premiums Were Earned and Losses Were Incurred	Premiums Earned			Loss and Loss Expense Payments							10 Salvage and Subrogation Received	11 Total Net Paid (Cols. 4 - 5 + 6 - 7 + 8 - 9)	12 Number of Claims Reported- Direct and Assumed
	1 Direct and Assumed	2 Ceded	3 Net (Cols. 1 - 2)	Loss Payments		Defense and Cost Containment Payments		Adjusting and Other Payments					
				4 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded				
1. Prior.....	XXX.....	XXX.....	XXX.....	3,523	2,391	66	4	17		84	1,211	XXX.....	
2. 2009.....	658,401	10,826	647,575	470,628	2,940	19,968	254	51,141		60,697	538,543	XXX.....	
3. 2010.....	701,533	12,057	689,476	549,786	13,228	22,978	706	65,996		71,171	624,826	XXX.....	
4. 2011.....	738,120	13,896	724,224	583,616	4,116	26,551	186	58,094		74,032	663,959	XXX.....	
5. 2012.....	788,609	13,361	775,247	615,524	6,182	25,791	153	65,717		81,803	700,696	XXX.....	
6. 2013.....	861,353	16,316	845,037	641,637	6,241	29,126	296	68,302	1	83,183	732,527	XXX.....	
7. 2014.....	971,922	16,775	955,147	759,189	6,790	32,143	545	82,476	2	94,022	866,471	XXX.....	
8. 2015.....	1,062,214	18,813	1,043,401	808,730	3,738	32,297	330	88,357	6	100,955	925,310	XXX.....	
9. 2016.....	1,093,464	19,583	1,073,881	818,994	8,008	21,534	198	82,715	63	97,020	914,974	XXX.....	
10. 2017.....	1,116,462	123,118	993,344	817,002	143,739	9,790	3,965	85,175	606	94,243	763,657	XXX.....	
11. 2018.....	1,136,462	94,077	1,042,386	563,808	44,928	3,011	1,762	85,055	387	65,224	604,797	XXX.....	
12. Totals.....	XXX.....	XXX.....	XXX.....	6,632,437	242,301	223,255	8,399	733,045	1,065	822,434	7,336,972	XXX.....	

	Losses Unpaid				Defense and Cost Containment Unpaid				Adjusting and Other Unpaid		23 Salvage and Subrogation Anticipated	24 Total Net Losses and Expenses Unpaid	25 Number of Claims Outstanding- Direct and Assumed
	Case Basis		Bulk + IBNR		Case Basis		Bulk + IBNR		21 Direct and Assumed	22 Ceded			
	13 Direct and Assumed	14 Ceded	15 Direct and Assumed	16 Ceded	17 Direct and Assumed	18 Ceded	19 Direct and Assumed	20 Ceded					
1. Prior.....	37,595	36,560									190	1,035	XXX.....
2. 2009.....	263	135	44				67		7		73	246	XXX.....
3. 2010.....	1,713		1,617	1,138			146		16		99	2,354	XXX.....
4. 2011.....	2,122	633	1,278	949			423		67		317	2,308	XXX.....
5. 2012.....	2,647	517	2,115	1,783			851		118		300	3,431	XXX.....
6. 2013.....	5,205	435	2,607	1,749			1,674		260		702	7,562	XXX.....
7. 2014.....	10,211	322	3,622	2,245			3,213		549		1,568	15,028	XXX.....
8. 2015.....	23,845	93	6,927	3,762			7,506		1,183		3,338	35,606	XXX.....
9. 2016.....	43,568	2,367	17,926	4,681			15,572		2,572		10,049	72,590	XXX.....
10. 2017.....	78,691	10,369	51,629	2,966			23,608	1,015	7,097		23,329	146,675	XXX.....
11. 2018.....	124,427	20,865	184,440	16,336			29,587	1,218	17,126		50,805	317,161	XXX.....
12. Totals.....	330,287	72,296	272,205	35,609	0	0	82,647	2,234	28,995	0	90,770	603,995	XXX.....

	Total Losses and Loss Expenses Incurred			Loss and Loss Expense Percentage (Incurred/Premiums Earned)			Nontabular Discount		34 Inter-Company Pooling Participation Percentage	Net Balance Sheet Reserves after Discount	
	26 Direct and Assumed	27 Ceded	28 Net	29 Direct and Assumed	30 Ceded	31 Net	32 Loss	33 Loss Expense		35 Losses Unpaid	36 Loss Expenses Unpaid
1. Prior..	XXX.....	XXX.....	XXX.....	XXX.....	XXX.....	XXX.....			XXX.....	1,035	0
2. 2009.	542,118	3,329	538,789	82.3	30.8	83.2				172	74
3. 2010.	642,252	15,072	627,180	91.5	125.0	91.0				2,192	162
4. 2011.	672,151	5,884	666,267	91.1	42.3	92.0				1,818	490
5. 2012.	712,762	8,635	704,127	90.4	64.6	90.8				2,462	969
6. 2013.	748,811	8,722	740,089	86.9	53.5	87.6				5,628	1,934
7. 2014.	891,403	9,904	881,499	91.7	59.0	92.3				11,266	3,762
8. 2015.	968,845	7,929	960,916	91.2	42.1	92.1				26,917	8,689
9. 2016.	1,002,881	15,317	987,564	91.7	78.2	92.0				54,446	18,144
10. 2017.	1,072,992	162,660	910,332	96.1	132.1	91.6				116,985	29,690
11. 2018.	1,007,454	85,496	921,958	88.6	90.9	88.4				271,666	45,495
12. Totals	XXX.....	XXX.....	XXX.....	XXX.....	XXX.....	XXX.....	0	0	XXX.....	494,587	109,408

Note: Parts 2 and 4 are gross of all discounting, including tabular discounting. Part 1 is gross of only nontabular discounting, which is reported in Columns 32 and 33 of Part 1. The tabular discount, if any, is reported in the Notes to Financial Statements, which will reconcile Part 1 with Parts 2 and 4.

SCHEDULE P - PART 2 - SUMMARY

Years in Which Losses Were Incurred	Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)										DEVELOPMENT	
	1	2	3	4	5	6	7	8	9	10	11	12
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	One Year	Two Year
1. Prior.....	123,598	117,659	118,469	116,795	114,527	116,359	118,950	119,602	121,019	121,660	641	2,058
2. 2009.....	489,483	484,768	488,668	488,899	485,020	486,764	488,497	488,307	487,724	487,641	(83)	(666)
3. 2010.....	XXX	532,097	555,304	560,863	553,488	557,038	561,391	561,140	561,169	561,168	(1)	28
4. 2011.....	XXX	XXX	550,197	594,756	591,299	605,540	608,235	607,726	608,118	608,106	(12)	380
5. 2012.....	XXX	XXX	XXX	571,439	613,773	632,905	640,343	639,433	638,694	638,293	(401)	(1,140)
6. 2013.....	XXX	XXX	XXX	XXX	634,638	654,839	669,143	668,254	670,461	671,528	1,067	3,274
7. 2014.....	XXX	XXX	XXX	XXX	XXX	770,323	798,678	796,241	795,666	798,476	2,810	2,235
8. 2015.....	XXX	XXX	XXX	XXX	XXX	XXX	867,909	858,749	864,707	871,382	6,675	12,633
9. 2016.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	905,121	915,644	902,340	(13,304)	(2,781)
10. 2017.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	811,284	818,666	7,382	XXX
11. 2018.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	820,164	XXX	XXX
12. Totals.....											4,774	16,021

SCHEDULE P - PART 3 - SUMMARY

Years in Which Losses Were Incurred	Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)										11	12
	1	2	3	4	5	6	7	8	9	10	Number of Claims Closed With Loss Payment	Number of Claims Closed Without Loss Payment
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018		
1. Prior.....	000	62,338	89,778	103,127	110,484	114,009	116,523	117,682	119,431	120,625	XXX	XXX
2. 2009.....	313,483	410,716	446,793	467,505	479,085	484,114	485,798	486,763	487,086	487,402	XXX	XXX
3. 2010.....	XXX	350,053	461,189	508,014	532,884	547,565	555,266	557,256	558,107	558,830	XXX	XXX
4. 2011.....	XXX	XXX	381,121	497,826	545,917	582,174	597,300	602,315	604,155	605,865	XXX	XXX
5. 2012.....	XXX	XXX	XXX	401,846	524,858	584,346	615,603	628,765	632,794	634,980	XXX	XXX
6. 2013.....	XXX	XXX	XXX	XXX	416,419	555,764	611,696	639,113	657,475	664,226	XXX	XXX
7. 2014.....	XXX	XXX	XXX	XXX	XXX	506,806	669,376	722,488	762,077	783,997	XXX	XXX
8. 2015.....	XXX	XXX	XXX	XXX	XXX	XXX	561,283	722,850	790,958	836,959	XXX	XXX
9. 2016.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	585,919	762,297	832,322	XXX	XXX
10. 2017.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	519,856	679,088	XXX	XXX
11. 2018.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	520,129	XXX	XXX

SCHEDULE P - PART 4 - SUMMARY

Years in Which Losses Were Incurred	Bulk and IBNR Reserves on Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)									
	1	2	3	4	5	6	7	8	9	10
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
1. Prior.....	55,132	21,381	13,249	6,717	1,054	333	642	545	549	
2. 2009.....	98,365	32,387	19,384	10,069	1,047	382	1,381	842	210	111
3. 2010.....	XXX	92,480	43,387	25,307	4,731	1,408	2,126	1,270	1,111	625
4. 2011.....	XXX	XXX	79,940	45,881	12,897	5,963	3,761	2,277	1,784	752
5. 2012.....	XXX	XXX	XXX	79,392	35,921	16,051	9,023	4,950	2,635	1,183
6. 2013.....	XXX	XXX	XXX	XXX	124,878	42,056	22,378	10,366	4,886	2,532
7. 2014.....	XXX	XXX	XXX	XXX	XXX	140,545	60,457	29,210	10,682	4,590
8. 2015.....	XXX	XXX	XXX	XXX	XXX	XXX	175,017	65,716	26,807	10,671
9. 2016.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	204,047	87,518	28,817
10. 2017.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	178,902	71,256
11. 2018.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	196,473

IDS PROPERTY CASUALTY INSURANCE COMPANY SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories

States, Etc.	1 Active Status (a)	Gross Premiums, Including Policy and Membership Fees Less Return Premiums and Premiums on Policies Not Taken		4 Dividends Paid or Credited to Policyholders on Direct Business	5 Direct Losses Paid (Deducting Salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Finance and Service Charges not Included in Premiums	9 Direct Premiums Written for Federal Purchasing Groups (Incl. in Col. 2)
		2 Direct Premiums Written	3 Direct Premiums Earned						
1. Alabama.....AL	L	4,317,377	5,780,588		4,450,699	3,732,088	2,136,872	17,381	
2. Alaska.....AK	L								
3. Arizona.....AZ	L	36,825,120	38,944,669		26,409,418	26,013,196	12,688,762	156,835	
4. Arkansas.....AR	L	3,580,858	4,456,488		3,418,097	3,396,135	1,174,825	12,115	
5. California.....CA	L	422,163,874	410,414,966		329,508,471	350,462,183	226,329,422	1,832,092	
6. Colorado.....CO	L	30,680,123	31,774,984		35,541,731	34,851,668	12,636,345	93,901	
7. Connecticut.....CT	L	13,533,463	14,868,932		15,266,174	12,255,266	6,958,862	63,235	
8. Delaware.....DE	L	3,005,506	3,078,900		1,756,967	1,345,731	2,107,380	11,176	
9. District of Columbia.....DC	L	778,054	821,788		540,894	873,936	584,152	4,395	
10. Florida.....FL	L	27,034,418	26,417,081		22,326,395	21,761,836	16,881,241	114,834	
11. Georgia.....GA	L	13,753,209	18,003,455		19,806,506	15,473,965	6,965,126	46,973	
12. Hawaii.....HI	L	3,067,324	3,139,508		2,475,399	1,997,241	1,374,651	17,663	
13. Idaho.....ID	L	1,901,905	1,872,056		1,127,442	1,131,939	488,899	10,392	
14. Illinois.....IL	L	18,017,614	18,060,614		13,580,323	11,670,274	7,130,554	69,560	
15. Indiana.....IN	L	10,528,628	11,837,583		8,670,750	5,597,694	2,627,552	38,192	
16. Iowa.....IA	L	2,367,542	2,906,077		2,117,791	1,884,261	868,193	8,873	
17. Kansas.....KS	L	2,061,675	2,432,103		1,391,034	1,299,942	664,879		
18. Kentucky.....KY	L	3,753,634	3,857,093		2,690,358	1,353,639	1,769,405	14,126	
19. Louisiana.....LA	L								
20. Maine.....ME	L								
21. Maryland.....MD	L	17,305,066	17,054,587		14,280,499	12,975,122	5,189,140	59,479	
22. Massachusetts.....MA	L	16,185,037	17,692,204		11,460,541	10,139,420	6,786,861	50,511	
23. Michigan.....MI	L	57,680,025	59,124,132		42,409,608	39,811,296	56,136,503	183,926	
24. Minnesota.....MN	L	24,622,491	26,777,427		23,588,510	22,231,221	7,979,174	82,257	
25. Mississippi.....MS	L	851,501	1,624,330		1,359,730	2,297,099	1,542,180	4,647	
26. Missouri.....MO	L	9,284,766	11,399,878		6,612,562	5,957,401	2,905,190	29,999	
27. Montana.....MT	L	4,243,425	4,142,777		3,594,266	3,860,669	1,281,145	16,951	
28. Nebraska.....NE	L	2,213,185	2,389,043		2,043,257	1,173,754	229,822	6,357	
29. Nevada.....NV	L	16,588,068	16,171,603		12,321,108	17,547,528	12,529,954	71,255	
30. New Hampshire.....NH	L	1,034,342	1,665,331		1,229,687	484,470	326,608	7,614	
31. New Jersey.....NJ	L	34,218,800	35,272,004		30,407,475	24,920,014	26,037,874	112,345	
32. New Mexico.....NM	L	3,019,490	3,153,168		3,343,282	3,676,042	1,526,160	13,356	
33. New York.....NY	L	15,956,169	16,481,500		11,324,972	10,737,584	11,933,160	78,673	
34. North Carolina.....NC	L	14,463,520	16,187,374		13,049,117	15,247,160	8,369,527	59,846	
35. North Dakota.....ND	L								
36. Ohio.....OH	L	14,274,308	17,749,879		10,159,445	9,985,793	5,405,551	64,832	
37. Oklahoma.....OK	L	3,730,753	4,350,173		2,483,586	2,578,991	1,082,590	11,973	
38. Oregon.....OR	L	30,089,756	30,506,078		17,237,253	18,628,355	12,327,705	124,025	
39. Pennsylvania.....PA	L	7,051,379	7,301,762		4,433,259	3,260,294	3,594,986	32,009	
40. Rhode Island.....RI	L								
41. South Carolina.....SC	L	7,602,973	7,618,792		5,256,192	6,214,322	3,197,233	28,245	
42. South Dakota.....SD	L	1,026,260	1,036,652		853,416	670,062	85,698	3,293	
43. Tennessee.....TN	L	4,396,395	5,564,496		3,420,183	3,293,916	1,532,635	19,680	
44. Texas.....TX	L	69,749,139	75,694,576		53,644,673	56,851,207	22,903,722	217,891	
45. Utah.....UT	L	7,432,889	7,236,485		5,187,377	4,404,737	3,569,006	35,249	
46. Vermont.....VT	L	3,661,558	3,661,375		2,102,494	1,785,934	989,712	17,572	
47. Virginia.....VA	L	15,468,010	15,815,202		14,386,471	12,979,629	5,043,145	44,602	
48. Washington.....WA	L	84,183,640	81,670,530		54,794,547	53,028,791	40,747,023	339,347	
49. West Virginia.....WV	L								
50. Wisconsin.....WI	L	15,244,379	16,278,453		10,142,366	9,564,213	6,107,443	64,141	
51. Wyoming.....WY	L								
52. American Samoa.....AS	N								
53. Guam.....GU	N								
54. Puerto Rico.....PR	N								
55. US Virgin Islands.....VI	N								
56. Northern Mariana Islands.....MP	N								
57. Canada.....CAN	N								
58. Aggregate Other Alien.....OT	XXX	0	0	0	0	0	0	0	0
59. Totals.....	XXX	1,078,947,648	1,102,286,696	0	852,204,325	849,406,018	552,746,867	4,291,817	0

DETAILS OF WRITE-INS

58001.....	XXX								
58002.....	XXX								
58003.....	XXX								
58998. Summary of remaining write-ins for Line 58 from overflow page	XXX	0	0	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above)	XXX	0	0	0	0	0	0	0	0

Explanation of Basis of Allocation of Premiums by States, etc.

Actual State No Allocation

(a) Active Status Counts:

L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG.....	51
E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - See DSLI).....	0
D - Domestic Surplus Lines Insurer (DSLI) - Reporting entities authorized to write surplus lines in the state of domicile.....	0

R - Registered - Non-domiciled RRGs.....	0
Q - Qualified - Qualified or accredited reinsurer.....	0
N - None of the above - Not allowed to write business in the state.....	6

**INSURER MEMBERS OF A HOLDING COMPANY GROUP
PART 1 - ORGANIZATIONAL CHART**

	<u>ID Number</u>	<u>STATE</u>	<u>NAIC #</u>
Ameriprise Financial, Inc.....	13-3180631		
— Ameriprise Advisor Capital, LLC.....	27-0544454		
— Ameriprise Advisor Financing, LLC.....			
— Ameriprise Capital Trust I.....	45-6157641		
— Ameriprise Capital Trust II.....	45-6157643		
— Ameriprise Capital Trust III.....	45-6157644		
— Ameriprise Capital Trust IV.....	45-6157645		
— Ameriprise Captive Insurance Company.....	20-5761939	VT	12852
— Ameriprise Certificate Company.....	41-6009975		
— Investors Syndicate Development Corporation.....	41-0951695		
— Ameriprise Holdings, Inc.....	26-3878824		
— 201 Eleventh Street South, LLC.....	45-5464028		
— Ameriprise India Private Limited.....			
— Ameriprise National Trust Bank.....	06-1791061		
— Ameriprise Trust Company.....	41-6219335		
— AMPF Holding Corporation.....	38-2722519		
— American Enterprise Investment Services Inc.....	41-1667086		
— Ameriprise Advisory Management, LLC.....			
— Ameriprise Financial Services, Inc.....	41-0973005		
— AMPF Property Corporation.....	38-3050688		
— AMPF Realty Corporation.....	38-3050690		
— Investment Professionals, Inc.....	74-2629876		
— IDS Property Casualty Insurance Company.....	39-1173498	WI	29068
— Ameriprise Auto & Home Insurance Agency, Inc.....	82-0541142		
— Ameriprise Insurance Company.....	65-1261374	WI	12504
— RiverSource Distributors, Inc.....	42-1690915		
— RiverSource Life Insurance Company.....	41-0823832	MN	65005
— RiverSource Life Insurance Co. of New York.....	41-0987741	NY	80594
— RiverSource NY REO, LLC.....	27-0380139		
— RiverSource REO 1, LLC.....	26-4164569		
— RiverSource Tax Advantaged Investments, Inc.....	13-6178563		
— AEXP Affordable Housing Portfolio, LLC.....	41-1977631		
— CREA Corporate Tax Credit Fund XXVIII, LLC.....			
— Columbia Management Investment Advisers, LLC.....	41-1533211		
— Advisory Capital Strategies Group, Inc.....	41-1624224		
— Columbia Multi-Sector Municipal Income ETF.....	82-5504769		
— Columbia Emerging Markets Bond Private Fund LLC.....	46-4842432		
— Columbia Focused Large Cap Growth Private Fund, LLC (Private Invest Fund).....			
— Columbia Institutional High Yield Fixed Income Private Fund, LLC.....	45-5077345		
— Columbia U.S. Contrarian Core Equity Private Fund, LLC.....			
— Emerging Global Advisors, LLC.....			
— Centurion CDO IV Limited.....			
— Centurion CDO VI, Ltd.....	98-0424253		
— Centurion CDO 7 Limited.....	98-0416968		
— Centurion CDO 8, Ltd.....	98-0435521		
— Centurion CDO IX Limited.....	98-0446511		
— Centurion CDO 10 Limited.....	98-0465083		
— Cent CLO 11 Limited.....	98-0463886		
— Cent CLO 12 Limited.....	98-0507952		
— Cent CLO 14 Limited.....	98-0509628		
— Cent CLO 15 Limited.....	98-0528007		
— Cent CLO 18 Limited.....	98-1105047		
— Cent CLO 19 Limited.....	98-1132125		
— Cent CLO 21 Limited.....	98-1174078		
— Cent CLO 23 Limited.....	98-1210182		
— Cent CLO 24 Limited.....	98-1252643		
— Cent CLO 27 Limited.....			
— Cent CLO 28 Limited.....			
— Columbia Adaptive Retirement 2020.....	82-2427165		
— Columbia Adaptive Retirement 2025.....	82-4135960		
— Columbia Adaptive Retirement 2030.....	82-2442360		
— Columbia Adaptive Retirement 2035.....	82-4150305		
— Columbia Adaptive Retirement 2040.....	82-2464783		
— Columbia Adaptive Retirement 2045.....	82-4172289		
— Columbia Adaptive Retirement 2050.....	82-2481153		
— Columbia Adaptive Retirement 2055.....	82-4188116		
— Columbia Adaptive Retirement 2060.....	82-2498236		
— Columbia Adaptive Risk Allocation Fund, LLC.....	46-4892631		
— Columbia Wanger Asset Management, LLC.....	04-3519872		
— GA Legacy, LLC.....	26-2639148		
— J. & W. Seligman & Co. Incorporated.....	13-3043476		
— Columbia Management Investment Distributors, Inc.....	13-3043478		
— Seligman Partners, LLC.....	13-4200160		
— Seligman Tech Spectrum Fund, LLC.....	13-4200160		
— Lionstone Partners, LLC.....	76-0694729		
— Cash Flow Asset Management GP, LLC.....	81-4006192		
— Cash Flow Asset Management, L.P.....	20-0065394		
— Lionstone Advisory Services, LLC.....	27-1065302		
— Lionstone CFRE II Real Estate Advisory, LLC.....	47-1271089		
— Lionstone Development Services, LLC.....	46-4179110		
— LPL 1111 Broadway GP, LLC.....	81-4664116		
— LPL 1111 Broadway, L.P.....	36-4855005		
— RiverSource CDO Seed Investments, LLC.....	87-0812264		
— Columbia Management Investment Services Corp.....	41-1861053		

**INSURER MEMBERS OF A HOLDING COMPANY GROUP
PART 1 - ORGANIZATIONAL CHART**

	<u>ID Number</u>	<u>STATE</u>	<u>NAIC #</u>
Ameriprise Financial, Inc. (continued).....	13-3180631		
— Ameriprise International Holdings GmbH.....			
— Ameriprise Asset Management Holdings GmbH.....			
— Ameriprise Asset Management Holdings Singapore (Pte.) Ltd.....			
— Ameriprise Asset Management Holdings Hong Kong Limited.....			
— Threadneedle Portfolio Services Hong Kong Ltd.....			
— Threadneedle Asset Management Malaysia Sdn. Bhd.....			
— Threadneedle Investments Singapore (Pte.) Ltd.....			
— Threadneedle Investments Taiwan Ltd.....			
— Ameriprise Holdings Singapore (Pte.) Ltd.....			
— Threadneedle Asset Management Holdings Sarl.....			
— CTM Holdings Limited.....			
— Columbia Threadneedle Investments (ME) Ltd.....			
— TAM Investment Ltd.....			
— Threadneedle International Investments GmbH.....			
— Threadneedle Management Luxembourg S.A.....			
— Threadneedle Asian Focus.....			
— Threadneedle US Disciplined Core Equities.....			
— Threadneedle Holdings Ltd.....			
— TAM UK Holdings Ltd.....			
— Threadneedle Asset Management Holdings Ltd.....			
— Columbia Threadneedle Foundation.....			
— TC Financing Limited.....			
— Threadneedle Asset Management Ltd.....	98-0691981		
— Threadneedle Investment Services Ltd.....	98-0691982		
— Threadneedle Asset Management (Nominees) Ltd.....			
— Sackville TIPP Property (GP) Ltd.....			
— Threadneedle Asset Management Finance Ltd.....			
— TMS Investment Ltd.....			
— Threadneedle International Ltd.....			
— Threadneedle Investments Ltd.....			
— Threadneedle Investments (Channel Islands) Ltd.....			
— Threadneedle Management Services Ltd.....			
— Threadneedle Securities Ltd.....			
— Threadneedle Navigator ISA Manager Ltd.....			
— Threadneedle Pensions Ltd.....			
— Sackville (TPEN) (75%).....			
— Threadneedle Portfolio Services Ltd.....			
— Threadneedle Portfolio Services AG.....			
— Threadneedle Property Investments Ltd.....			
— Sackville LCW (GP) Ltd.....			
— Sackville (CTESIF) GP S.á r.l.....			
— Sackville Property (GP) Ltd.....			
— Sackville SPF IV (GP) No. 1 Ltd.....			
— Sackville SPF IV (GP) No. 2 Ltd.....			
— Sackville SPF IV (GP) No. 3 Ltd.....			
— Sackville SPF IV Property (GP) Ltd.....			
— Sackville Tandem Property (GP) Ltd.....			
— Sackville TPEN Property (GP) Ltd.....			
— Sackville TPEN Property Nominee Ltd.....			
— Sackville (TPEN) (25%).....			
— Sackville TSP Property (GP) Ltd.....			
— Sackville UK Property Select II (GP) Ltd.....			
— Sackville UK Property Select II (GP) No. 1 Ltd.....			
— Sackville UK Property Select II (GP) No. 2 Ltd.....			
— Sackville UK Property Select II (GP) No. 3 Ltd.....			
— Threadneedle Unit Trust Manager Ltd.....			
— Threadneedle EMEA Holdings 1, LLC.....	47-3044011		

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