

## COLORADO DIVISION OF INSURANCE 2004 COMPLAINT RATIO

The 2004 consumer complaint ratios of insurance companies and health carriers illustrate how some companies generate more complaints per \$1 million of premium than others. The ratios provide helpful information to consumers interested in evaluating their insurance companies and/or health carriers, and to state regulators in targeting companies requiring closer review.

In the tables below, a complaint ratio of 4.40, for example, means the company had approximately 4.40 complaints per \$1 million worth of business. Total complaint numbers are also listed, together with premium volume and market share. For the purposes of this report, a complaint is defined as written correspondence expressing a grievance against an insurer or carrier; no judgment is made in the ratios as to whether the complaint is justified. Private passenger automobile protests are included in the number of complaints. Federal Employees Health Benefit Plan premiums are not included in this report as the complaints are not counted against the company.

The report includes companies with five (5) or more complaints or at least one tenth of a percent (.1%) of the premium volume in a particular line of insurance. In this manner, the report looks at those companies with significant numbers of complaints but also provides information on a number of insurers and carriers writing business in Colorado. Due to the small number of health maintenance organizations and prepaid dental organizations, all have been included in the report.

Tables are included for lines of insurance which account for the greatest numbers of complaints and premiums written. On average, private passenger automobile insurance generates the highest complaint ratios, followed by homeowners/farmowners and accident and health insurance. Life insurance companies and health maintenance organizations have lower average complaint ratios, though significant differences can be seen between companies within these lines.

Large differences can be seen among competing companies; small differences should not be considered meaningful. Complaint ratios which are based on less than \$1 million in premium are highly variable and may not be adequate measures of a company's performance.

Consumers are cautioned against relying only on complaint ratios when evaluating companies; premiums, benefits, financial condition, and level of service should all be considered.

**Please Note: The companies included in this report are responsible for reconciling documented complaints and reporting discrepancies to the Division of Insurance; however, not all of the companies have performed this review. Therefore, this report may contain unconfirmed information.**

**All numbers have been rounded to two (2) decimal places.**

**Private Passenger Auto Insurance Complaints**

	2004 Complaint Ratio	Total Complaints 1/1/04 - 12/31/04	Premium (\$ Million)	2004 Marketshare
AIU Insurance Co.	1.32	19	14.41	0.51%
Allied Property and Casualty Insurance Co.	1.10	16	14.59	0.52%
Allstate Indemnity Co.	0.85	18	21.26	0.76%
Allstate Insurance Co.	0.97	109	112.32	3.99%
Allstate Property and Casualty Insurance Co.	0.68	42	62.12	2.21%
AMCO Insurance Co.	0.67	12	17.83	0.63%
American Bankers Insurance Co. of FL	1.08	33	30.66	1.09%
American Family Mutual Insurance Co.	1.54	338	220.18	7.82%
American International Insurance Co.	2.41	13	5.40	0.19%
American International South Insurance Co.	3.98	8	2.01	0.07%
American National General Insurance Co.	2.15	7	3.25	0.12%
American National Property and Casualty Co.	1.55	40	25.88	0.92%
American Standard Insurance Co. of WI	1.11	81	73.22	2.60%
AMEX Assurance Co.	1.29	14	10.85	0.39%
Amica Mutual Insurance Co.	0.76	12	15.74	0.56%
Auto-Owners Insurance Co.	0.96	4	4.18	0.15%
Bristol West Insurance Co.	0.00	0	4.87	0.17%
California Casualty Indemnity Exchange	1.60	23	14.36	0.51%
Charter Oak Fire Insurance Co.	1.75	17	9.69	0.34%
Colorado Casualty Insurance Co.	3.27	26	7.95	0.28%
Colorado Farm Bureau Mutual Insurance Co	1.41	43	30.48	1.08%
Country Mutual Insurance Co.	0.53	13	24.74	0.88%
Country Preferred Insurance Co.	0.45	5	11.05	0.39%
Dairyland Insurance Co.	1.93	10	5.17	0.18%
Deerbrook Insurance Co.	2.23	12	5.37	0.19%
Depositors Insurance Co.	1.34	6	4.48	0.16%
Economy Premier Assurance Co.	0.95	6	6.31	0.22%
Electric Insurance Co.	6.86	7	1.02	0.04%
Encompass Indemnity Co.	0.00	0	6.52	0.23%
Encompass Insurance Co. of America	0.52	9	17.32	0.62%
Esurance Insurance Co.	0.42	3	7.20	0.26%
Farmers Alliance Mutual Insurance Co.	0.43	2	4.70	0.17%
Farmers Insurance Exchange	0.97	279	286.26	10.17%
Federal Insurance Co.	0.00	0	2.93	0.10%
Financial Indemnity Co.	1.63	23	14.12	0.50%
Fireman's Fund Insurance Co.	0.37	1	2.72	0.10%
GEICO Casualty Co.	1.19	33	27.66	0.98%
GEICO General Insurance Co.	1.28	55	42.99	1.53%

GEICO Indemnity Co.	0.96	21	21.88	0.78%
General Insurance Co. of America	0.94	11	11.66	0.41%
Glens Falls Insurance Co.	78.95	15	0.19	0.01%
Government Employees Insurance Co.	1.43	41	28.71	1.02%
Grange Insurance Association	1.10	4	3.65	0.13%
Great Northern Insurance Co.	0.42	3	7.21	0.26%
GuideOne Elite Insurance Co.	2.90	6	2.07	0.07%
Hanover Insurance Co.	26.32	5	0.19	0.01%
Hartford Accident and Indemnity Co.	6.61	8	1.21	0.04%
Hartford Insurance Co. of the Midwest	1.63	13	8.00	0.28%
Hartford Underwriters Insurance Co.	2.71	101	37.33	1.33%
Heritage Casualty Insurance Co.	7.81	5	0.64	0.02%
Horace Mann Insurance Co.	3.21	7	2.18	0.08%
Horace Mann Property & Casualty Ins. Co.	3.70	7	1.89	0.07%
Illinois National Insurance Co.	1.88	37	19.70	0.70%
Integon National Insurance Co.	1.62	8	4.95	0.18%
Liberty Mutual Fire Insurance Co.	1.53	61	39.81	1.41%
LM Property and Casualty Insurance Co.	2.53	5	1.98	0.07%
Mendota Insurance Co.	2.44	43	17.59	0.63%
Merastar Insurance Co.	13.48	19	1.41	0.05%
Metropolitan Casualty Insurance Co.	2.32	14	6.04	0.21%
Metropolitan Property and Casualty Ins. Co.	3.07	5	1.63	0.06%
Mid-Century Insurance Co.	1.36	149	109.89	3.90%
Nat'l Farmers Union Property and Casualty Co.	1.20	23	19.20	0.68%
National General Insurance Co.	1.37	9	6.56	0.23%
Nationwide Assurance Co.	6.06	6	0.99	0.04%
Nationwide Mutual Fire Insurance Co.	3.69	13	3.52	0.13%
Nationwide Mutual Insurance Co.	2.07	24	11.62	0.41%
Nationwide Property and Casualty Ins. Co.	3.33	8	2.40	0.09%
New Hampshire Indemnity Co., Inc.	3.74	15	4.01	0.14%
Northbrook Indemnity Co.	1.78	6	3.37	0.12%
Omni Insurance Co.	2.71	9	3.32	0.12%
Owners Insurance Co.	0.58	4	6.84	0.24%
Progressive Casualty Insurance Co.	0.64	46	72.15	2.56%
Progressive Halcyon Insurance Co.	0.76	63	83.08	2.95%
Progressive Mountain Insurance Co.	1.03	7	6.79	0.24%
Progressive Preferred Insurance Co.	0.08	1	12.91	0.46%
Progressive Specialty Insurance Co.	2.04	32	15.69	0.56%
Property and Casualty Ins. Co. of Hartford	1.97	50	25.38	0.90%
Response Worldwide Insurance Co.	4.85	8	1.65	0.06%
Safeco Insurance Co. of America	1.39	78	55.94	1.99%

Safeco Insurance Co. of IL	0.93	13	14.03	0.50%
Sentinel Insurance Co., Ltd.	0.56	5	8.85	0.31%
Sentry Insurance A Mutual Co.	1.51	5	3.32	0.12%
Shelter General Insurance Co.	1.42	4	2.81	0.10%
Shelter Mutual Insurance Co.	0.61	14	22.97	0.82%
Standard Fire Insurance Co.	1.81	7	3.87	0.14%
State Farm Fire and Casualty Co.	1.45	62	42.75	1.52%
State Farm Mutual Automobile Insurance Co.	0.53	302	566.90	20.14%
Teachers Insurance Co.	2.24	15	6.70	0.24%
Titan Indemnity Co.	1.09	16	14.64	0.52%
TravCo Insurance Co.	2.04	6	2.94	0.10%
Travelers Indemnity Co. of America	5.61	40	7.13	0.25%
Travelers Property Casualty Co. of America	3.03	31	10.24	0.36%
Trinity Universal Insurance Co.	3.59	7	1.95	0.07%
Trinity Universal Insurance Co. of KS, Inc.	0.82	4	4.86	0.17%
United Services Automobile Association	1.33	128	96.17	3.42%
Unitrin Auto and Home Insurance Co.	1.32	11	8.34	0.30%
USAA Casualty Insurance Co.	0.92	72	78.51	2.79%
USAA General Indemnity Co.	0.27	2	7.49	0.27%
Viking Insurance Co. of WI	1.43	34	23.71	0.84%
West American Insurance Co.	0.34	1	2.92	0.10%

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**Accident and Health Insurance Complaints***(Excluding HMOs and Prepaid Dental Organizations)*

	2004 Complaint Ratio	Total Complaints 1/1/04 - 12/31/04	Premium (\$ Million)	2004 Marketshare
Aetna Life Insurance Co.	0.13	9	70.02	2.48%
AIG Life Insurance Co.	0.00	0	5.59	0.20%
Allianz Life Insurance Co. of North America	0.00	0	9.41	0.33%
American Bankers Insurance Co. of FL	0.00	0	2.85	0.10%
American Family Life Assur. Co. of Columbus	0.21	7	33.44	1.18%
American Family Mutual Insurance Co.	0.13	1	7.97	0.28%
American Fidelity Assurance Co.	0.49	4	8.14	0.29%
American Heritage Life Insurance Co.	0.28	1	3.53	0.12%
American Medical Security Life Insurance Co.	0.07	1	13.85	0.49%
American Republic Insurance Co.	0.26	5	18.97	0.67%
Ameritas Life Insurance Corp.	0.00	0	3.42	0.12%
Anthem Blue Cross and Blue Shield	0.32	145	450.86	15.94%
Bankers Life and Casualty Co.	0.32	5	15.58	0.55%
Celtic Insurance Co.	0.82	3	3.65	0.13%
Colonial Life & Accident Insurance Co.	0.16	1	6.29	0.22%
Combined Insurance Co. of America	0.34	4	11.90	0.42%
Companion Life Insurance Co.	0.00	0	8.31	0.29%
Connecticut General Life Insurance Co.	0.13	15	119.12	4.21%
Conseco Health Insurance Co.	0.81	4	4.95	0.17%
Conseco Senior Health Insurance Co.	1.71	6	3.51	0.12%
Continental Assurance Co.	1.01	3	2.96	0.10%
Continental Casualty Co.	1.44	9	6.25	0.22%
Continental General Insurance Co.	0.22	1	4.49	0.16%
CUNA Mutual Insurance Society	0.21	1	4.67	0.17%
Empire Fire and Marine Insurance Co.	3.87	38	9.81	0.35%
Equitable Life & Casualty Insurance Co.	0.10	1	10.30	0.36%
Fidelity Security Life Insurance Co.	1.06	5	4.72	0.17%
Fortis Benefits Insurance Co.	0.06	2	33.79	1.19%
Fortis Insurance Co.	0.78	58	74.05	2.62%
GE Group Life Assurance Co.	0.00	0	11.09	0.39%
General Electric Capital Assurance Co.	0.00	0	27.49	0.97%
Golden Rule Insurance Co.	0.32	15	46.25	1.63%
Great-West Life & Annuity Insurance Co.	0.06	2	32.82	1.16%
Guarantee Trust Life Insurance Co.	1.13	4	3.53	0.12%
Guardian Life Insurance Co. of America	0.17	11	63.79	2.25%
Hartford Life and Accident Insurance Co.	0.13	3	23.99	0.85%
Hartford Life Group Insurance Co.	0.00	0	2.79	0.10%

HCC Life Insurance Co.	0.00	0	11.73	0.41%
Humana Insurance Co.	0.27	33	121.26	4.29%
HumanaDental Insurance Co.	0.11	1	9.41	0.33%
IDS Life Insurance Co.	0.19	1	5.20	0.18%
Jefferson Pilot Financial Insurance Co.	0.12	2	16.77	0.59%
John Alden Life Insurance Co.	0.52	3	5.81	0.21%
John Hancock Life Insurance Co.	0.17	3	18.10	0.64%
Kaiser Permanente Insurance Co.	1.20	10	8.33	0.29%
Liberty Life Assurance Co. of Boston	0.00	0	4.25	0.15%
Life Insurance Co. of North America	0.00	0	11.85	0.42%
Life Investors Insurance Co. of America	0.47	8	16.96	0.60%
Lincoln Benefit Life Co.	0.00	0	2.69	0.10%
London Life Reinsurance Co.	0.00	0	2.74	0.10%
Massachusetts Mutual Life Insurance Co.	0.00	0	5.97	0.21%
MEGA Life and Health Insurance Co.	1.61	65	40.30	1.42%
Metropolitan Life Insurance Co.	0.18	9	51.36	1.82%
Mid-West National Life Insurance Co. of TN	0.92	19	20.75	0.73%
Minnesota Life Insurance Co.	0.46	3	6.56	0.23%
Monumental Life Insurance Co.	0.26	1	3.82	0.13%
Mutual of Omaha Insurance Co.	0.24	6	25.08	0.89%
National Foundation Life Insurance Co.	0.51	4	7.86	0.28%
New England Life Insurance Co.	0.38	5	13.05	0.46%
New York Life Insurance Co.	0.20	2	10.11	0.36%
Northwestern Mutual Life Insurance Co.	0.06	1	16.34	0.58%
Pacific Life & Annuity Co.	0.91	36	39.46	1.39%
PacifiCare Life Assurance Co.	0.08	10	133.13	4.71%
Paul Revere Life Insurance Co.	0.16	1	6.19	0.22%
Penn Treaty Network America Insurance Co.	0.46	2	4.34	0.15%
Physicians Mutual Insurance Co.	0.00	0	9.36	0.33%
Principal Life Insurance Co.	0.06	2	35.65	1.26%
Provident Life & Accident Insurance Co.	0.00	0	12.48	0.44%
Prudential Insurance Co. of America	0.20	2	9.93	0.35%
Reliance Standard Life Insurance Co.	0.00	0	6.14	0.22%
Reliastar Life Insurance Co.	0.00	0	6.48	0.23%
Rocky Mountain Healthcare Options, Inc.	0.23	15	66.13	2.34%
Standard Insurance Co.	0.09	3	31.98	1.13%
Standard Life and Accident Insurance Co.	0.56	2	3.60	0.13%
State Farm Mutual Automobile Insurance Co.	0.00	0	15.50	0.55%
Stonebridge Life Insurance Co.	0.00	0	6.62	0.23%
Sun Life Assurance Co. of Canada (U.S.)	0.00	0	10.07	0.36%

Symetra Life Insurance Co.	0.00	0	9.36	0.33%
Thrivent Financial for Lutherans	0.00	0	7.57	0.27%
Transamerica Life Insurance Co.	0.00	0	5.26	0.19%
Travelers Insurance Co.	3.77	8	2.12	0.08%
Unicare Life & Health Insurance Co.	0.69	4	5.80	0.21%
Union Labor Life Insurance Co.	0.00	0	3.45	0.12%
United American Insurance Co.	1.18	9	7.63	0.27%
United Healthcare Insurance Co.	0.15	91	590.72	20.88%
United of Omaha Life Insurance Co.	0.00	0	7.56	0.27%
United States Life Ins. Co. in the City of NY	0.35	3	8.53	0.30%
Unum Life Insurance Co. of America	0.12	4	32.55	1.15%
USAA Life Insurance Co.	0.00	0	2.96	0.10%
Vision Service Plan Insurance Co.	0.00	0	28.64	1.01%
World Insurance Co.	0.67	6	8.90	0.31%

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### **HMO and Prepaid Dental Complaints**

	2004 Complaint Ratio	Total Complaints 1/1/04 - 12/31/04	Premium (\$ Million)	2004 Marketshare
Aetna Health Inc.	0.13	13	103.71	4.47%
CIGNA Dental Health of CO, Inc.	0.22	2	9.04	0.39%
CIGNA Healthcare of CO, Inc.	0.16	33	203.10	8.76%
Colorado Dental Service, Inc.	0.02	2	108.38	4.67%
Denver Health Medical Plan, Inc.	0.00	0	25.89	1.12%
Great-West Healthcare of CO, Inc.	0.08	4	51.91	2.24%
HMO Colorado, Inc.	0.11	22	204.95	8.84%
Humana Health Plan, Inc.	0.00	0	0.12	0.01%
Kaiser Foundation Health Plan of CO	0.05	43	868.38	37.44%
Pacificare Dental of CO, Inc.	0.00	0	2.71	0.12%
PacifiCare of CO, Inc.	0.14	61	451.52	19.46%
Rocky Mountain HMO, Inc.	0.09	15	163.24	7.04%
San Luis Valley HMO, Inc.	0.23	3	12.83	0.55%
United Dental Care of CO, Inc.	0.00	0	4.11	0.18%
United Healthcare of CO, Inc.	0.29	32	109.78	4.73%

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### **Homeowners and Farmowners Insurance Complaints**

	2004 Complaint Ratio	Total Complaints 1/1/04 - 12/31/04	Premium (\$ Million)	2004 Marketshare
Alliance Insurance Co., Inc.	1.23	2	1.63	0.14%
Allied Property and Casualty Insurance Co.	0.53	5	9.50	0.83%
Allstate Indemnity Co.	0.15	3	19.98	1.75%
Allstate Insurance Co.	0.60	33	54.57	4.78%
Allstate Property and Casualty Insurance Co.	0.12	2	16.68	1.46%
AMCO Insurance Co.	0.49	6	12.23	1.07%
American Automobile Insurance Co.	0.24	1	4.17	0.37%
American Bankers Insurance Co. of FL	0.61	1	1.64	0.14%
American Family Mutual Insurance Co.	0.30	46	153.83	13.48%
American International Ins. Co.	0.00	0	6.24	0.55%
American National Property and Casualty Co.	0.46	6	13.02	1.14%
American States Insurance Co.	0.00	0	2.13	0.19%
AMEX Assurance Co.	0.34	1	2.96	0.26%
Amica Mutual Insurance Co.	0.30	2	6.73	0.59%
Armed Forces Insurance Exchange	0.00	0	1.73	0.15%
Automobile Insurance Co. of Hartford, CT	0.63	2	3.20	0.28%
Auto-Owners Insurance Co.	0.80	2	2.51	0.22%
Balboa Insurance Co.	1.01	6	5.96	0.52%
California Casualty Indemnity Exchange	0.78	2	2.56	0.22%
Centre Insurance Co.	2.68	3	1.12	0.10%
Charter Oak Fire Insurance Co.	1.40	5	3.58	0.31%
Colorado Casualty Insurance Co.	0.44	4	8.99	0.79%
Colorado Farm Bureau Mutual Insurance Co.	0.54	12	22.32	1.96%
Country Mutual Insurance Co.	0.41	6	14.47	1.27%
Economy Premier Assurance Co.	0.45	2	4.45	0.39%
Encompass Indemnity Co.	0.00	0	2.58	0.23%
Encompass Insurance Co. of America	0.35	3	8.66	0.76%
Farmers Alliance Mutual Insurance Co.	0.00	0	5.60	0.49%
Farmers Insurance Exchange	2.05	5	2.44	0.21%
Federal Insurance Co.	0.25	2	7.95	0.70%
Fidelity National Property and Casualty Ins. Co.	0.56	1	1.77	0.16%
Fire Insurance Exchange	0.41	65	160.28	14.05%
Fireman's Fund Insurance Co.	0.25	1	3.93	0.34%
Foremost Insurance Co. Grand Rapids, MI	0.95	11	11.57	1.01%
Foremost Property and Casualty Insurance Co.	3.54	4	1.13	0.10%
Grange Insurance Association	0.73	3	4.11	0.36%
Great Northern Insurance Co.	0.00	0	23.19	2.03%
GuideOne Mutual Insurance Co.	1.71	2	1.17	0.10%

Hartford Casualty Insurance Co.	0.32	1	3.16	0.28%
Hartford Ins. Co. of the Midwest	0.00	0	3.11	0.27%
Hartford Underwriters Insurance Co.	0.41	6	14.68	1.29%
Homesite Indemnity Co.	0.67	1	1.50	0.13%
Horace Mann Insurance Co.	1.57	2	1.27	0.11%
Indemnity Insurance Co. of North America	0.00	0	2.39	0.21%
Liberty Mutual Fire Insurance Co.	0.19	3	15.82	1.39%
LM Property and Casualty Insurance Co.	14.71	5	0.34	0.03%
Metropolitan Direct Property and Casualty Ins. Co.	1.05	2	1.90	0.17%
Metropolitan Property and Casualty Insurance Co.	0.75	1	1.34	0.12%
Nat'l Farmers Union Property and Casualty Co.	0.43	5	11.54	1.01%
Nationwide Mutual Fire Insurance Co.	1.77	5	2.82	0.25%
Owners Insurance Co.	0.16	1	6.07	0.53%
Property and Casualty Insurance Co. of Hartford	0.71	7	9.85	0.86%
Safeco Insurance Co. of America	0.68	15	22.12	1.94%
Sentinel Insurance Co. Ltd.	0.00	0	5.08	0.45%
Sentry Insurance A Mutual Co.	0.90	2	2.21	0.19%
Shelter Mutual Insurance Co.	0.60	7	11.73	1.03%
Standard Fire Insurance Co.	0.48	15	31.39	2.75%
State Farm Fire and Casualty Co.	0.23	62	271.64	23.80%
Teachers Insurance Co.	0.00	0	2.20	0.19%
Travelers Indemnity Co. of America	0.82	4	4.87	0.43%
Travelers Indemnity Co. of CT	0.47	1	2.14	0.19%
Travelers Indemnity Co.	0.83	1	1.20	0.11%
Trinity Universal Insurance Co.	1.16	2	1.73	0.15%
Twin City Fire Insurance Co.	0.45	1	2.23	0.20%
Union Insurance Co. of Providence	0.00	0	1.52	0.13%
United Services Automobile Association	0.15	6	39.89	3.50%
Unitrin Auto and Home Insurance Co.	0.60	2	3.32	0.29%
USAA Casualty Insurance Co.	0.33	8	24.29	2.13%
Vigilant Insurance Co.	0.00	0	5.24	0.46%
West American Insurance Co.	0.31	1	3.20	0.28%
Western Mutual Insurance Co.	1.59	2	1.26	0.11%

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### **Life Insurance and Annuity Complaints**

	2004 Complaint Ratio	Total Complaints 1/1/04 - 12/31/04	Premium (\$ Million)	2004 Marketshare
Aetna Life Insurance Co.	0.00	0	39.76	0.47%
AGL Life Assurance Co.	0.00	0	31.53	0.37%
AIG Annuity Insurance Co.	0.00	0	81.50	0.95%
AIG SunAmerica Life Assurance Co.	0.02	1	55.69	0.65%
Allianz Life Insurance Co. of North America	0.03	8	292.42	3.43%
Allmerica Financial Life Ins. and Annuity Co.	0.40	4	9.95	0.12%
Allstate Life Insurance Co.	0.09	3	34.67	0.41%
American Equity Investment Life Ins. Co.	0.00	0	43.15	0.51%
American Family Life Insurance Co.	0.04	1	26.10	0.31%
American General Life Insurance Co.	0.10	6	57.24	0.67%
American Investors Life Insurance Co.	0.00	0	16.81	0.20%
American National Insurance Co.	0.04	2	47.60	0.56%
American Skandia Life Assurance Corp.	0.02	2	107.81	1.26%
American United Life Insurance Co.	0.00	0	39.51	0.46%
Ameritas Variable Life Insurance Co.	0.00	0	8.50	0.10%
AmerUs Life Insurance Co.	0.03	1	30.02	0.35%
Anthem Life Insurance Co.	0.00	0	13.76	0.16%
AXA Equitable Life Insurance Co.	0.01	2	240.29	2.81%
Bankers Life and Casualty Co.	0.15	3	20.08	0.24%
Beneficial Life Insurance Co.	0.00	0	9.88	0.12%
Chase Insurance Life and Annuity Co.	0.09	1	10.84	0.13%
CM Life Insurance Co.	0.00	0	26.95	0.32%
Connecticut General Life Ins. Co.	0.00	0	61.89	0.72%
Conseco Life Insurance Co.	2.62	14	5.35	0.06%
CUNA Mutual Insurance Society	0.10	1	10.48	0.12%
CUNA Mutual Life Insurance Co.	0.00	0	11.70	0.14%
Equitrust Life Insurance Co.	0.00	0	14.73	0.17%
Farm Bureau Life Insurance Co.	0.00	0	14.77	0.17%
Farmers New World Life Insurance Co.	0.17	8	47.14	0.55%
Fidelity and Guaranty Life Insurance Co.	0.03	2	61.63	0.72%
Fidelity Investments Life Insurance Co.	0.07	1	14.31	0.17%
First Colony Life Insurance Co.	0.10	3	31.25	0.37%
Fortis Benefits Insurance Co.	0.18	2	11.38	0.13%
Fortis Insurance Co.	0.00	0	8.52	0.10%
GE Life and Annuity Assurance Co.	0.07	2	29.89	0.35%
General American Life Insurance Co.	0.06	1	15.47	0.18%
General Electric Capital Assurance Co.	0.08	1	12.58	0.15%
Glenbrook Life & Annuity Co.	0.00	0	70.74	0.83%

Great-West Life & Annuity Insurance Co.	0.00	0	271.26	3.18%
Guardian Life Insurance Co. of America	0.04	1	23.78	0.28%
Hartford Life and Accident Insurance Co.	0.06	2	31.22	0.37%
Hartford Life and Annuity Insurance Co.	0.02	4	177.13	2.07%
Hartford Life Insurance Co.	0.03	3	118.33	1.39%
Horace Mann Life Insurance Co.	0.00	0	9.84	0.12%
IDS Life Insurance Co.	0.00	0	46.97	0.55%
ING Life Insurance and Annuity Co.	0.06	2	31.73	0.37%
ING USA Annuity and Life Insurance Co.	0.00	1	273.56	3.20%
Jackson National Life Insurance Co.	0.01	4	309.40	3.62%
Jefferson Pilot Financial Insurance Co.	0.11	2	18.45	0.22%
Jefferson Pilot Life Insurance Co.	0.04	1	24.35	0.29%
John Hancock Life Insurance Co.	0.02	1	51.13	0.60%
John Hancock Life Insurance Co. (U.S.A.)	0.00	1	206.30	2.42%
John Hancock Variable Life Insurance Co.	0.00	0	25.72	0.30%
Kansas City Life Insurance Co.	0.00	0	20.56	0.24%
Kemper Investors Life Insurance Co.	0.00	0	12.13	0.14%
Knights of Columbus	0.00	0	9.01	0.11%
Life Insurance Co. of North America	0.00	0	13.81	0.16%
Life Investors Ins. Co. of America	0.00	0	9.64	0.11%
Lincoln Benefit Life Co.	0.02	1	66.42	0.78%
Lincoln National Life Insurance Co.	0.00	0	209.62	2.46%
Massachusetts Mutual Life Insurance Co.	0.02	2	89.61	1.05%
Merrill Lynch Life Insurance Co.	0.00	0	11.88	0.14%
MetLife Investors Insurance Co.	0.00	0	30.72	0.36%
MetLife Investors USA Insurance Co.	0.00	0	57.09	0.67%
Metropolitan Life Insurance Co.	0.03	10	289.64	3.39%
Midland National Life Insurance Co.	0.06	5	85.78	1.00%
Minnesota Life Insurance Co.	0.00	0	66.70	0.78%
Modern Woodmen of America	0.00	0	12.49	0.15%
Monumental Life Insurance Co.	0.01	1	94.06	1.10%
Mutual of America Life Insurance Co.	0.00	0	12.66	0.15%
National Western Life Insurance Co.	0.06	1	15.61	0.18%
Nationwide Life and Annuity Insurance Co.	0.00	0	15.46	0.18%
Nationwide Life Insurance Co.	0.01	2	155.89	1.83%
New England Life Insurance Co.	0.07	4	53.81	0.63%
New York Life Insurance and Annuity Corp.	0.01	1	87.75	1.03%
New York Life Insurance Co.	0.03	3	93.48	1.10%
North American Co. for Life and Health Ins.	0.13	3	22.58	0.26%
Northwestern Mutual Life Insurance Co.	0.00	0	143.69	1.68%
Ohio National Life Ins. Co.	0.00	0	17.79	0.21%

Pacific Life & Annuity Co.	0.03	2	61.76	0.72%
Pacific Life Insurance Co.	0.00	1	217.07	2.54%
Penn Mutual Life Insurance Co.	0.09	1	11.40	0.13%
Peoples Benefit Life Insurance Co.	0.13	2	15.06	0.18%
PHL Variable Insurance Co.	0.00	0	11.75	0.14%
Phoenix Life Insurance Co.	0.00	0	14.82	0.17%
Primerica Life Insurance Co.	0.11	2	18.31	0.21%
Principal Life Insurance Co.	0.00	0	311.58	3.65%
Protective Life Insurance Co.	0.07	1	13.57	0.16%
Provident Life and Accident Insurance Co.	0.06	1	17.26	0.20%
Pruco Life Insurance Co.	0.00	0	47.12	0.55%
Prudential Insurance Co. of America	0.02	6	320.80	3.76%
ReliaStar Life Insurance Co.	0.03	1	37.84	0.44%
Security Benefit Life Insurance Co.	0.07	2	29.01	0.34%
Security Life of Denver Insurance Co.	0.00	4	945.84	11.08%
Standard Insurance Co.	0.00	0	88.03	1.03%
State Farm Life Insurance Co.	0.01	1	70.53	0.83%
Sun Life Assurance Co. of Canada	0.05	1	18.70	0.22%
Sun Life Assurance Co. of Canada (U.S.)	0.01	1	82.70	0.97%
Symetra Life Insurance Co.	0.00	0	12.41	0.15%
Teachers Ins. & Annuity Assn. of America	0.00	0	117.60	1.38%
Thrivent Financial for Lutherans	0.00	0	78.49	0.92%
Transamerica Life Insurance and Annuity Co.	0.05	2	40.91	0.48%
Transamerica Life Insurance Co.	0.00	0	97.07	1.14%
Transamerica Occidental Life Insurance Co.	0.00	0	182.85	2.14%
Travelers Insurance Co.	0.00	0	64.18	0.75%
Travelers Life & Annuity Co.	0.00	0	20.53	0.24%
United of Omaha Life Insurance Co.	0.03	1	33.09	0.39%
Unum Life Insurance Co. of America	0.11	2	17.77	0.21%
USAA Life Insurance Co.	0.00	0	29.19	0.34%
Valley Forge Life Insurance Co.	0.21	3	14.29	0.17%
Variable Annuity Life Insurance Co.	0.00	0	78.17	0.92%
West Coast Life Insurance Co.	0.23	2	8.82	0.10%
Western Reserve Life Assurance Co. of OH	0.00	0	45.58	0.53%

**Please Note: The companies included in this report are responsible for reconciling documented complaints and reporting discrepancies to the Division of Insurance; however, not all of the companies have performed this review. Therefore, this report may contain unconfirmed information.**

**All numbers have been rounded to two (2) decimal places.**