

JUN 14 2024

FILED

CERTIFICATION

June 14, 2024

I, Eric Dunning, Director of Insurance of the State of Nebraska, do hereby certify that the attached is a full and correct copy of the Financial Examination Report of

FIRST NATIONAL LIFE INSURANCE COMPANY OF THE U.S.A.

AS OF

DECEMBER 31, 2022

The report is now on file and forming a part of the records of this Department.

I hereto subscribe my name under the seal of my office at Lincoln, Nebraska.



A handwritten signature in blue ink, appearing to read "Eric Dunning".

DIRECTOR OF INSURANCE

CERTIFICATE OF ADOPTION

Notice of the proposed report for the financial examination of

FIRST NATIONAL LIFE INSURANCE COMPANY OF THE U.S.A.

121 SOUTH 13TH STREET, SUITE 200

LINCOLN, NE 68508

dated as of December 31, 2022, verified under oath by the examiner-in-charge on
May 7, 2024, and received by the company on May 20, 2024, has been adopted
without modification as the final report pursuant to Neb. Rev. Stat. § 44-5906(3) (a).

Dated this 4th day of June 2024.

STATE OF NEBRASKA
DEPARTMENT OF INSURANCE

A handwritten signature in black ink, appearing to read "L. Crawford", written in a cursive style.

Lindsay Crawford, CFE
Chief Financial Regulator

STATE OF NEBRASKA

Department of Insurance

EXAMINATION REPORT

OF

FIRST NATIONAL LIFE INSURANCE COMPANY OF THE U.S.A.

as of

December 31, 2022

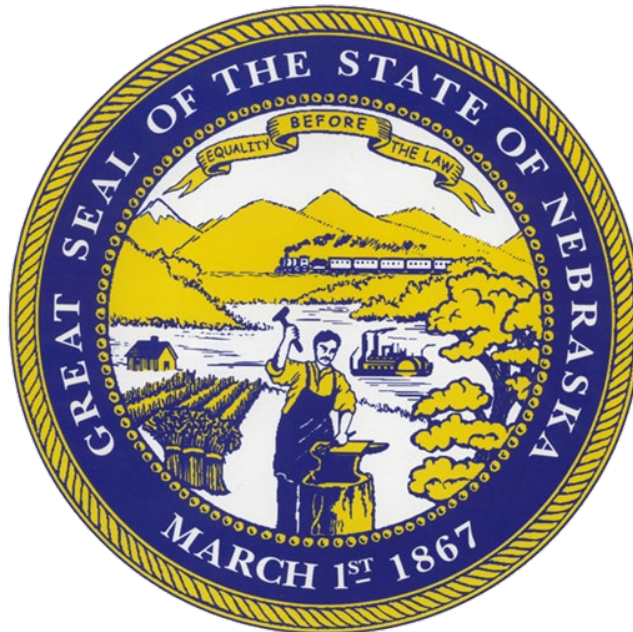


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Lincoln, NE
April 4, 2024

Honorable Eric Dunning
Director of Insurance
Nebraska Department of Insurance
1526 K Street, Suite 200
Lincoln, Nebraska 68508

Dear Sir:

Pursuant to your instruction and authorizations, and in accordance with statutory requirements, an examination has been conducted of the financial condition and business affairs of:

**FIRST NATIONAL LIFE INSURANCE COMPANY OF THE U.S.A.
121 South 13th Street, Suite 200
Lincoln, Nebraska 68508**

(hereinafter also referred to as the “Company”), and the report of such examination is respectfully presented herein.

INTRODUCTION

The State of Nebraska last examined the Company as of December 31, 2017. The current financial condition examination covers the intervening period to, and includes, the close of business on December 31, 2022 and such subsequent events and transactions as were considered pertinent to this report. The State of Nebraska participated in this examination and assisted in the preparation of this report.

SCOPE OF EXAMINATION

The examination was conducted pursuant to and in accordance with both the NAIC Financial Condition Examiners Handbook (Handbook) and Section §44-5904(1) of the Nebraska Insurance Statutes. The Handbook requires that examiners plan and perform the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining

information about the Company, including but not limited to: corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. The examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation and management's compliance with Statutory Accounting Principles and Annual Statement Instructions when applicable to domestic state regulations.

The Nebraska Department of Insurance made a general review of the Company's operations and the manner in which its business has been conducted in order to determine compliance with statutory and charter provisions. The Company's history was traced and has been set out in this report under the caption "Description of Company." All items pertaining to management and control were reviewed, including provisions for disclosure of conflicts of interest to the Board of Directors and the departmental organization of the Company. The Articles of Incorporation and By-Laws were reviewed, including appropriate filings of any changes or amendments thereto. The minutes of the meetings of the Shareholder and the Board of Directors, held during the examination period, were read and noted. Attendance at meetings, proxy information, election of Directors and Officers and approval of investment transactions were also noted.

The fidelity bond and other insurance coverages protecting the Company's property and interests were reviewed. Certificates of Authority to conduct the business of insurance in the various states were inspected, and a survey was made of the Company's general plan of operation.

Data reflecting the Company's growth during the period under review, as developed from the Company's filed annual statements, is reflected in the financial section of this report under the caption "Body of Report."

The Company's reinsurance facilities were ascertained and noted and have been commented upon in this report under the caption "Reinsurance." Accounting records and procedures were tested to the extent deemed necessary through the risk-focused examination process. The Company's method of claims handling and procedures pertaining to the adjustment and payment of incurred losses were also noted.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. The Company has been granted an exemption from filing an audited financial report for each year under the exam, thus our review did not include a review of workpapers prepared by external auditors.

Any failure of items to add to the totals shown in schedules and exhibits appearing throughout this report is due to rounding.

DESCRIPTION OF COMPANY

HISTORY

The Company was incorporated on March 27, 1908, and commenced business on August 8, 1908, as a burial association. The Company was originally organized as the Western Indemnity Company. In 1937, the Company's name was changed to the First National Life Insurance Company (Limited) of the U.S.A. On August 8, 1956, the name of the Company was changed to its present form.

Effective as of January 1, 1957, the Company merged its business with that of Public Life Insurance Company, Lincoln, Nebraska, and became the surviving corporation.

In November 1978, 100% ownership of the Company was acquired by Packers Service Group, Inc. (at that time, Packers Insurance Agency, Inc.). Effective January 1, 1979, Packers Reinsurance Company, an Arizona corporation owned by the Company's parent, was merged into the Company by means of a stock exchange.

Effective as of May 31, 2007, the Company's parent, Packers Service Group, Inc., merged its business into Nelnet Academic Services, LLC, a wholly owned subsidiary of Nelnet, Inc. (Nelnet).

Under the provisions of its current charter, and in conformity with Nebraska Statutes, the Company is authorized to conduct the business of a stock life insurance company. The Articles of Incorporation provide that the Company shall have a perpetual existence.

MANAGEMENT AND CONTROL

Holding Company

The Company is a member of an insurance holding company system as defined by Nebraska Statute. An organizational listing flowing from the "Ultimate Controlling Person", as reported in the 2022 Annual Statement, is represented by the following (subsidiaries are denoted through the use of indentations, and unless otherwise indicated, all subsidiaries are 100% owned). The listing includes an abbreviated chart of all insurance related entities:

Nelnet, Inc. (Michael Dunlap owns approximately 43.2% of outstanding shares and 81.9% of all votes)

 National Education Loan Network, Inc.

 Nelnet Insurance Services, LLC

 First National Life Insurance Company of the U.S.A.

Shareholder

Article VI of the Company's Articles of Incorporation states that, "the total number of shares of capital stock which the Corporation is authorized to issue is 50,000 shares with a par

value of \$10.00 per share, representing an aggregate par value of \$500,000”. At the date of this examination, Company records indicated that 17,500 shares were issued and outstanding in the name of Nelnet. No changes have occurred in the capital stock and gross paid-in and contributed surplus of the Company during the period covered by this examination.

Regarding the annual meeting, the By-Laws state that, “the annual meeting of the Shareholders shall be held on such date and time as may be fixed by the Board of Directors, President, or Secretary...”

Board of Directors

Article II, Section 1, of the Company’s By-Laws states that, “the business and affairs of the Corporation shall be managed by a Board of Directors consisting of no less than five (5) nor more than twenty-one (21) Directors... The Board of Directors shall meet at least quarterly.”

Article II, Section 2 of the Company’s By-Laws states that, “...the Shareholders shall elect Directors who shall hold office until the next succeeding annual meeting...” In addition, Section 6 states, “the annual meeting of the Board of Directors shall be held without notice other than this By-Law immediately following adjournment of the annual meeting of Shareholders...”

The following persons were serving as Directors at December 31, 2022:

<u>Name and Residence</u>	<u>Principal Occupation</u>
Todd M. Eicher Lincoln, Nebraska	Chief Executive Officer, TME Ventures, LLC & Co-Founder of ClearDegree.com
Jeffrey L. Jobs Lincoln, Nebraska	Internal Auditor, Horizon Bank
James D. Kruger Lincoln, Nebraska	Chief Financial Officer, Nelnet
Jane L. Mach Lincoln, Nebraska	Partner, Rembolt Ludtke LLP

<u>Name and Residence</u>	<u>Principal Occupation</u>
Thomas K. Massey Lincoln, Nebraska	President of the Company
Charles R. Norris Lincoln, Nebraska	Managing Director, Nelnet
Timothy A. Tewes Lincoln, Nebraska	President, Nelnet

The Company only pays Director fees for the independent members of the Board, Todd Eicher, Jeffrey Jobes, and Jane Mach. Each independent director receives \$150 per Board meeting.

Officers

Article III, Section 1, of the Company’s By-Laws states that, “the Officers of the Corporation shall be a President, one or more Vice Presidents (as the Board of Directors shall determine), a Secretary and a Treasurer and such other Officers and agents as may be deemed necessary by the Board of Directors. Any two or more offices may be held by the same person.”

The following is a listing of Officers elected and serving the Company as of December 31, 2022:

<u>Name and Residence</u>	<u>Office</u>
Jeffrey Jobes	Chairman
Thomas Massey	President and Secretary
Karli Toft	Treasurer and Assistant Secretary

TRANSACTIONS WITH AFFILIATES

Intercompany Services Agreement

The Company entered into an Intercompany Services Agreement with National Education Loan Network, Inc. (NELN). Under the terms of the agreement, NELN agrees to provide staffing for the services provided and will provide consultation, support, advice, and assistance as needed. Services that are to be provided include infrastructure, corporate

communication, enterprise risk management, people services, cash, accounts payable, fixed asset accounting, and facilities.

The Company agrees to pay NELN a fee commensurate with the actual time spent or expenses incurred by NELN personnel or via other mechanisms, such as a percentage of fixed assets or square foot allocation. Fees are to be settled on a quarterly basis and shall be made within 30 days of receipt of the settlement request from NELN. The Company may terminate the agreement by providing 90 days written notice to NELN.

Custodial Agreement

The Company entered into a custodial agreement with Union Bank, effective May 3, 2010. Union Bank opened and maintains an agency account in the name of the Company. The agreement was found to be in compliance with Nebraska Rules and Regulations, Chapter 81 of Title 210.

TERRITORY AND PLAN OF OPERATION

As evidenced by a current Certificate of Authority, the Company is licensed to transact business in Nebraska.

The production of business is supervised and directed by the Company's President. The primary source of revenue for the Company comes from assumed reinsurance business with Assurity Life Insurance Company (Assurity). In the past the Company wrote credit life and disability on loans to borrowers made by banks and financial institutions however, all of this business is currently in run-off and administered by a third-party administrator. The Company is not actively marketing insurance products.

REINSURANCE

Assumed

The Company entered into a coinsurance agreement for indemnity reinsurance with Assurity. The agreement reinsures two products, Peace of Mind (POM) and CollegeInsure.

POM provides benefits for the payment of private school (K-12) tuition for the remainder of the school year upon the death of the person that signed the tuition agreement, up to a maximum of \$30,000. Underwriting guidelines are limited and the only condition for coverage is the insured person, or the spouse of the person that signed the tuition payment agreement for the current school year, must be under the age of 70 on the later of the day insurance is elected or the tuition payment agreement is signed.

The amount of benefit payable is limited to the outstanding balance owed for the students' education, up to a maximum benefit amount of \$30,000. The Company assumes 90% of each certificate. Plans under this agreement are reinsured on a coinsurance basis and reinsurance premiums are proportionate to the gross premiums charged of \$13.50 per certificate for the first 100,000 agreements and \$13.50 per certificate for agreements greater than 100,000.

CollegeInsure is a term life insurance product payable on the death of the covered student. The Company assumes 90% of each certificate. The school is the policyholder, and the maximum benefit payable is \$40,000. Premium rates are \$0.20 per month per thousand of coverage.

The CollegeInsure Plan is subject to an annual experience refund. The experience refund is based upon a 60% claims-to-premiums loss ratio during each calendar year. If claims paid are less than 60% of premiums received for the preceding calendar year, an experience refund shall be paid up to that amount and the Company's share of the refund is 90%.

Ceded Credit Life and Accident & Health

An automatic reinsurance agreement is in place with Munich American Reassurance Company providing automatic excess coverage of new credit life and credit A&H business written directly by the Company on or after January 1, 2000, or existing credit life business written prior thereto. Plans covered include Level Term - Single or Joint Life, Decreasing Term - Single or Joint Life, Credit - A&H, and Outstanding Balance - Credit Life. The maximum amount retained by the Company per individual is: Life - \$20,000, A&H - \$300 per month. On level and decreasing term single and joint life plans, the reinsurer will accept up to \$180,000 in excess of retention through age 60 and \$55,000 (ages 61-65) and up to \$2,700 and \$200 for A&H only per month on A&H. Reinsurance premiums under this agreement are subject to an experience refund computed at the end of each calendar year. The policies reinsured by Munich are all in run-off.

Ceded Ordinary Life

An automatic coinsurance agreement with Optimum Re Insurance Company provides coverage on Universal Life plans. The total amount of automatic life coverage ceded shall be up to four (4) times the Company's retention for age and classification, up to a maximum of \$60,000 on any one life. The Company's retention is \$15,000 per life all ages and ratings. The treaty contains an automatic jumbo limit that provides that the Company shall not automatically cede any risk where the amount in force would exceed \$2,000,000 on any one individual. The minimum amount of insurance ceded shall not be less than \$2,000. The treaty allows for facultative options. Life and accidental death benefits under this agreement are on a Yearly Renewable Term basis and rate. The treaty contains a production/persistency bonus on the in-

force business. Coverage includes both standard and substandard lives, accidental death benefits, and waiver of premium disability benefits.

An automatic coinsurance agreement with Optimum Re Insurance Company provides coverage on business referred to as the Annual Renewable Term - "ART 100" Plan. The treaty provides for automatic cessions not to exceed four (4) times the Company's maximum retention of \$15,000 for all ages. The treaty contains an automatic jumbo limit that provides that the Company shall not automatically cede any risk where the amount in force would exceed \$2,000,000 on any one individual. The minimum amount of insurance ceded shall not be less than \$2,000. The treaty allows for facultative options. Life and accidental death benefits under this agreement are on a Yearly Renewable Term basis and rate. The treaty contains a production/persistency bonus on the in-force business. Coverage includes both standard and substandard lives, accidental death benefits, and waiver of premium disability benefits.

General

All contracts reviewed contained standard insolvency, arbitration, and termination clauses where applicable. All contracts contained the clauses necessary to assure reinsurance credits could be taken.

BODY OF REPORT

GROWTH

The following comparative data reflects the growth of the Company during the period covered by this examination:

	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
Bonds	\$1,588,752	\$1,801,045	\$2,532,356	\$1,444,406	\$1,763,922
Admitted assets	6,199,124	6,621,475	6,427,869	6,056,850	8,386,258
Aggregate reserves for life contracts	1,204,244	1,159,496	1,181,143	1,161,375	1,052,652
Aggregate reserves for accident & health contracts	514,017	395,478	354,291	206,805	110,347
Total liabilities	3,928,962	3,569,422	3,629,585	3,667,791	3,084,329
Capital and surplus	2,270,161	3,052,054	2,798,284	2,389,059	5,301,927
Premiums earned	2,004,930	1,846,414	1,859,383	1,832,224	1,765,102
Net investment income	77,202	340,079	147,422	119,939	105,836
Death benefits	1,069,376	1,165,273	1,285,831	1,537,254	1,375,050
Disability benefits	123,275	72,248	39,786	48,723	46,221
Net income	(73,964)	2,772,676	(219,449)	(238,076)	2,930,550
Life Insurance in force (in thousands)	690,339	730,213	726,132	767,044	779,961

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the Nebraska Department of Insurance and present the financial condition of the Company for the period ending December 31, 2022. The accompanying comments on financial statements reflect any examination adjustments to the amounts reported in the annual statements and should be considered an integral part of the financial statements. A reconciliation of the capital and surplus account for the period under review is also included.

FINANCIAL STATEMENT
December 31, 2022

<u>Assets</u>	<u>Assets</u>	<u>Assets Not Admitted</u>	<u>Net Admitted Assets</u>
Bonds	\$1,763,922		\$1,763,922
Common stocks	199,906		199,906
Cash and short-term investments	3,470,085		3,470,085
Other invested assets	<u>2,838,925</u>		<u>2,838,925</u>
Subtotal, cash and invested assets	\$8,272,838		\$8,272,838
Investment income due and accrued	630		630
Deferred premiums	865		865
Amounts recoverable from reinsurer	1,627		1,627
Receivables from parent, subsidiaries and affiliates	3,404		3,404
Prepayment and other receivables	<u>106,894</u>		<u>106,894</u>
Totals	<u>\$8,386,258</u>		<u>\$8,386,258</u>

Liabilities, Surplus, and Other Funds

Aggregate reserves for life contract	\$1,052,652
Aggregate reserves for accident and health contracts	110,347
Contract claims:	
Life	470,165
Accident and health	15,513
Other amounts payable on reinsurance	51,150
Interest maintenance reserve	351,241
General expenses due and accrued	9,052
Taxes, licenses and fees due or accrued	5,431
Current federal and foreign income taxes	7,583
Net deferred tax liability	489,748
Amounts held for agents' account	(320)
Asset valuation reserve	501,052
Payable to parent, subsidiaries and affiliates	<u>20,175</u>
 Total liabilities	 <u>\$3,084,329</u>
 Common capital stock	 175,000
Gross paid in and contributed surplus	114,863
Unassigned funds (surplus)	5,012,064
 Total capital and surplus	 <u>\$5,301,927</u>
 Totals	 <u>\$8,386,256</u>

SUMMARY OF OPERATIONS – 2022

Premiums and annuity considerations	\$1,765,102
Net investment income	105,836
Amortization of interest maintenance reserve	15,441
Commission and expense allowances on reinsurance ceded	<u>9,081</u>
Totals	<u>\$1,895,460</u>
Death benefits	\$1,375,050
Matured endowments (excluding guaranteed annual pure endowments)	500
Disability benefits and benefits under accident and health contracts	46,221
Increase in aggregate reserves for life and accident and health contracts	<u>(205,181)</u>
Totals	<u>\$1,216,590</u>
Commissions on premiums, annuity considerations and deposit-type contract funds	\$ (21,084)
Commissions and expense allowances on reinsurance assumed	284,311
General insurance expenses	493,559
Insurance taxes, licenses and fees, excluding federal income taxes	18,561
Increase in loading on deferred and uncollected premiums	<u>89</u>
Totals	<u>\$1,992,026</u>
Net gain from operations before federal income taxes	\$ (96,566)
Federal income taxes incurred	(30,824)
Net gain from operations after federal income taxes and before realized capital gains	(65,742)
Net realized capital gains	<u>2,996,292</u>
Net income	<u><u>\$2,930,550</u></u>

CAPITAL AND SURPLUS ACCOUNT

	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
Capital and surplus, beginning	\$2,358,102	\$2,270,164	\$3,052,054	\$2,798,288	\$2,389,060
Net income	\$ (73,954)	\$2,772,676	\$ (219,449)	\$ (238,076)	\$2,930,550
Change in net unrealized capital gains	(92,962)	(1,619,888)			
Change in net deferred income tax	11,199	(520,595)	48,181	(93,311)	123,022
Change in asset valuation reserve	67,779	149,700	(82,498)	(77,837)	(140,709)
Net change for the year	\$ (87,938)	\$ 781,893	\$ (253,766)	\$ (409,224)	\$2,912,863
Capital and surplus, ending	\$2,270,164	\$3,052,054	\$2,798,288	\$2,389,060	\$5,301,922

EXAMINATION CHANGES IN FINANCIAL STATEMENTS

Unassigned funds (surplus) in the amount of \$5,012,064 as reported in the Company's 2022 Annual Statement has been accepted for examination purposes. Examination findings, in the aggregate, were considered to have no material effect on the Company's financial condition.

COMPLIANCE WITH PREVIOUS RECOMMENDATIONS

The recommendations appearing in the previous report of examination are reflected below together with the remedial actions taken by the Company to comply therewith:

Election of Officers - It is recommended that the Board of Directors conduct an annual election of Officers in accordance with their stated By-Laws.

Action: The Company has complied with this recommendation

Appointed Actuary Reporting - It is recommended the Company work with its Appointed Actuary to ensure a presentation is given to the Board of Directors each year on the items within the scope of the Actuarial Opinion. The presentation conducted by the Appointed Actuary should be robust and include discussion of all relevant risks.

Action – The Company has not complied with this recommendation. This recommendation will be repeated under the caption “Commentary on Current Examination Findings” in this report.

Stockholder Meeting – It is recommended the Company hold its Stockholder meeting on or before June 30th each calendar year as required by Nebraska Revised Statutes §44-210.

Action: Company has complied with this recommendation

COMMENTARY ON CURRENT EXAMINATION FINDINGS

Schedule Y Part 2

A review of the Schedule Y Part 2 disclosure in the 2022 Annual Statement filing indicated that the Company has not properly disclosed transactions with affiliates from management agreements in accordance with the NAIC Annual Statement Instructions. It is recommended that the Company enhance documentation such that all transactions from management service agreements with affiliates are properly disclosed in Schedule Y Part 2 in accordance with the NAIC Annual Statement Instructions.

Quarterly Investment Approvals

Review of the Board of Directors minutes indicated that there was no Board of Directors meeting held for third quarter 2022, therefore there was no quarterly investment approval for third quarter 2022. Nebraska Revised Statutes §44-5105(3) requires that the Company approve investments transactions on no less than a quarterly basis. It is recommended that the Company hold quarterly Board of Directors meetings and that investment activity be approved at said meetings in accordance with Neb. Rev. Stat. §44-5105(3).

Annual Investment Policy Review

Review of the Board of Directors minutes indicated that the Board of Directors was not approving the investment policy on an annual basis. Neb. Rev. Stat. §44-5105 requires that the Board of Directors formally review the written investment policy on an annual basis. It is

recommended that the Board of Directors formally review and approve the written investment policy on an annual basis in accordance with Neb. Rev. Stat. §44-5105.

Appointed Actuary Reporting

Review of the Board of Directors minutes indicated that the Appointed Actuary only participated in one Board of Directors meeting during the examination period. NAIC Annual Statement Instructions state, “the Appointed Actuary must report to the Board of Directors or the Audit Committee each year on the items within the scope of the Actuarial Opinion. The minutes of the Board of Directors shall reflect that the Appointed Actuary presented such information to the Board of Directors or the Audit Committee.”

It is recommended the Company ensures its Appointed Actuary presents to the Board of Directors on the Actuarial Opinion at least annually in accordance with the NAIC Annual Statement Instructions.

SUMMARY OF COMMENTS AND RECOMMENDATIONS

The following comments and recommendations have been made as a result of this examination:

Schedule Y Part 2 – It is recommended that the Company ensure that all transactions from management service agreements with affiliates are properly disclosed in Schedule Y Part 2 in accordance with the NAIC Annual Statement Instructions.

Quarterly Investment Approvals – It is recommended that the Company hold quarterly Board of Directors meetings and that investment activity is approved at said meetings in accordance with Neb. Rev. Stat. §44-5105(3).

Annual Investment Policy Review – It is recommended that the Board of Directors formally review and approve the written investment policy on an annual basis at said meetings in accordance with Neb. Rev. Stat. §44-5105.

Appointed Actuary Reporting – It is recommended the Company ensures its Appointed Actuary presents to the Board of Directors on the Actuarial Opinion at least annually in accordance with the NAIC Annual Statement Instructions.

ACKNOWLEDGMENT

The courteous cooperation extended by the Officers and employees of the Company during this examination is hereby acknowledged.

In addition to the undersigned, Joe Jacobson, CFE, Michael Sullivan, CFE, and Alexis Anderson, AFE, Financial Examiners; Gary Evans, CISA, CFE, Information Systems Specialist; and Joshua Wearne and Michael Muldoon, MAAA, FCA, ASA, Actuarial Examiners; all with the Nebraska Department of Insurance, participated in this examination and assisted in the preparation of this report.

Respectfully submitted,



Tadd K. Wegner, CFE
Examiner-in-Charge
Department of Insurance
State of Nebraska

State of Nebraska,

County of Lancaster,


Tadd K. Wegner, being duly sworn, states as follows:

1. I have authority to represent the Department of Insurance of the State of Nebraska in the examination of First National Life Insurance Company of the USA.
2. The Department of Insurance of the State of Nebraska is accredited under the National Association of Insurance Commissioners Financial Regulation Standards and Accreditation.
3. I have reviewed the examination work papers and examination report, and the examination of First National Life Insurance Company of the USA was performed in a manner consistent with the standards and procedures required by the Department of Insurance of the State of Nebraska.

The affiant says nothing further.

Tadd K. Wegner
Examiner-in-Charge's Signature

Subscribed and sworn before me by Tadd K. Wegner on this 7 day of May, 2024.

(SEAL) 

Patricia K. Hill
Notary Public

My commission expires 8-8-27 [date].