

# NEBRASKA

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## DEPARTMENT OF INSURANCE

January 06, 2023

Jennifer Webb  
Pacific Mutual Holding Company  
700 Newport Center Drive, Newport Beach, CA 92660  
Office: (949) 219-3639  
Mobile: (202) 340-5377  
Jennifer.Webb@PacificLife.com

RE: Designation of International Insurance Group

Dear Ms. Webb:

Pursuant to Neb. Rev. Stat. § 44-2154, an insurance holding company system shall be considered an international insurance group if the holding company system includes an insurer registered under Neb. Rev. Stat. § 44-2132 and:

- 1) The insurance holding company system has premiums written in at least three countries;
- 2) The percentage of gross premiums written outside the United States is at least ten percent of the insurance holding company system's gross written premiums; and
- 3) Based on a three-year rolling average, the total assets of the insurance holding company system are at least fifty billion dollars or the total gross written premiums of the insurance holding company system are at least ten billion dollars.

Pacific Mutual Holding Company meets these criteria and is therefore an international insurance group. Neb. Rev. Stat. § 44-2155 sets forth the criteria to consider in determining a group-wide supervisor for international insurance groups. Based on the

*Eric Dunning, Director*

**Department of Insurance**

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information available and pursuant to this statute, I have determined that I, as Director of the Nebraska Department of Insurance, am the appropriate group wide supervisor for Pacific Mutual Holding Company. However, prior to making this determination Neb. Rev. Stat. § 44-2155(8) requires you have thirty days to provide any additional information pertinent to this determination. Please provide any relevant information related to making this determination prior to February 05, 2023.

Thank you for your attention to this matter, and do not hesitate to reach out with any questions or concerns.

Nebraska Department of Insurance

A handwritten signature in blue ink, appearing to read "E. Dunning", is written over a horizontal line. The signature is stylized and extends to the right of the line.

Eric Dunning  
Director