

STATE OF INDIANA)
) SS: BEFORE THE INDIANA
COUNTY OF MARION) COMMISSIONER OF INSURANCE

IN THE MATTER OF:)
)
PacifiCare Life and Health Insurance Company)
9800 Health Care Lane MN006-W500)
Minnetonka, MN 55343)

Examination of: **PacifiCare Life and Health Insurance Company**


NOTICE OF ENTRY OF ORDER

Enclosed is the Final Order entered by Stephen W. Robertson, Commissioner of the Indiana Department of Insurance, after fully considering and reviewing the Verified Report of Examination of PacifiCare Life and Health Insurance Company, any relevant examination work papers, and any written submissions or rebuttals. The Verified Report of Examination, as sent to you on May 28, 2021, has been adopted by the Commissioner.

Pursuant to Ind. Code § 27-1-3.1-12(b), within thirty (30) days of receipt of the Final Order, each director of PacifiCare Life and Health Insurance Company shall file an affidavit with the Indiana Department of Insurance stating that he/she has received a copy of the Verified Report of Examination and the Final Order.

The Final Order is a final administrative decision that may be appealed pursuant to Ind. Code § 4-21.5-5.

June 9, 2021
Date


Roy Eft
Chief Financial Examiner

CERTIFIED MAIL NUMBER: 7018 1130 0001 7982 5942

STATE OF INDIANA) BEFORE THE INDIANA
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COUNTY OF MARION) COMMISSIONER OF INSURANCE

IN THE MATTER OF:)
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PacifiCare Life and Health Insurance Company)
9800 Health Care Lane MN006-W500)
Minnetonka, MN 55343)

Examination of: **PacifiCare Life and Health Insurance Company**

FINDINGS AND FINAL ORDER

The Indiana Department of Insurance conducted an examination into the affairs of the PacifiCare Life and Health Insurance Company (hereinafter “Company”) for the time period January 1, 2015 through December 31, 2019.

The Verified Report of Examination was filed with the Commissioner of the Department of Insurance (hereinafter “Commissioner”) by the Examiner on April 29, 2021.

A copy of the Verified Report of Examination, along with a Notice of Opportunity to Make Written Submission or Rebuttal, was mailed to the Company via Certified Mail on May 28, 2021 and was received by the Company on June 1, 2021.

The Company did not file any objections.

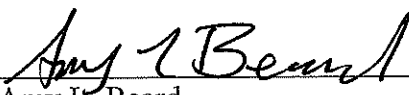
NOW THEREFORE, based on the Verified Report of Examination, I hereby make the following **FINDINGS**:

1. That the Verified Report of Examination is a true and accurate report of the financial condition and affairs of the PacifiCare Life and Health Insurance Company as of December 31, 2019.
2. That the Examiner’s Recommendations are reasonable and necessary in order for the PacifiCare Life and Health Insurance Company to comply with the laws of the State of Indiana.

Based on the FINDINGS, the Commissioner does hereby ORDER:

1. Pursuant to Ind. Code § 27-1-3.1-11(a)(1), the Verified Report of Examination is adopted and shall be filed. Hereafter the Verified Report of Examination, may constitute prima facie evidence of the facts contained therein in any action or proceeding taken by the Indiana Department of Insurance against the Company, its officers, directors, or agents.
2. The Company shall comply with the Examiner's Recommendations enumerated in summary form and throughout the text of the Verified Report of Examination. A written response to these recommendations should be provided to the Department within 30 days of receipt of this order.
3. Compliance with the Examiner's recommendations shall be completed on or before the filing of the subsequent annual statement. In the event it is not feasible to comply with a recommendation before the filing of the subsequent annual statement, the Company shall submit a written explanation as to why it was not feasible with the filing of the annual statement.

Signed this 9 day of
June, 2021.



Amy L. Beard
Insurance Commissioner
Indiana Department of Insurance

ABOUT AFFIRMATIONS

The following pages for affirmations need to be signed by each Board Member and returned to the Indiana Department of Insurance within thirty (30) days in accordance with I.C. §27-1-3.1-12(b).

If your affirmations list individuals that are no longer on your Board of Directors, you may simply retype the form on plain white paper with the correct names and a line to the right for signature. If the names are misspelled, you may do the same, simply re-type the corrected form with a line to the right for signature.

Should you have any questions or difficulties with these forms or you require additional time past the thirty (30) day requirement, please do not hesitate to contact this department at (317) 232-2390.

STATE OF INDIANA
Department of Insurance
REPORT OF EXAMINATION
OF

PACIFICARE LIFE AND HEALTH INSURANCE COMPANY

NAIC Co. CODE 70785
NAIC GROUP CODE 0707

As of

December 31, 2019

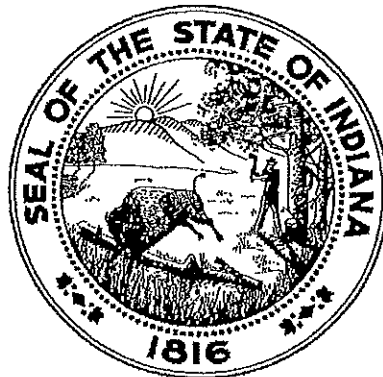


TABLE OF CONTENTS

SALUTATION.....	1
SCOPE OF EXAMINATION	2
HISTORY	2
CAPITAL AND SURPLUS	3
DIVIDENDS TO STOCKHOLDERS	3
TERRITORY AND PLAN OF OPERATION	3
GROWTH OF THE COMPANY.....	3
MANAGEMENT AND CONTROL.....	4
Directors	4
Officers.....	4
CONFLICT OF INTEREST	4
OATH OF OFFICE	5
CORPORATE RECORDS.....	5
Articles of Incorporation	5
Bylaws.....	5
Minutes.....	5
AFFILIATED COMPANIES.....	5
Organizational Structure	5
Affiliated Agreements	6
FIDELITY BOND AND OTHER INSURANCE.....	6
PENSION, STOCK OWNERSHIP, AND INSURANCE PLANS.....	6
SPECIAL AND STATUTORY DEPOSITS.....	7
REINSURANCE.....	7
ACCOUNTS AND RECORDS	7
FINANCIAL STATEMENTS	8
Assets	8
Liabilities, Surplus and Other Funds.....	9
Statement of Income.....	10
Capital and Surplus Account Reconciliation.....	11
COMMENTS ON THE FINANCIAL STATEMENTS	12
OTHER SIGNIFICANT ISSUES	12
SUBSEQUENT EVENTS.....	12
AFFIDAVIT.....	13



STATE OF INDIANA

ERIC J. HOLCOMB, GOVERNOR

Indiana Department of Insurance

Amy L. Beard, Commissioner
311 W. Washington Street, Suite 103
Indianapolis, Indiana 46204-2787
Telephone: 317-232-2385
Fax: 317-232-5251
Website: in.gov/doi

April 29, 2021

Honorable Amy L. Beard, Commissioner
Indiana Department of Insurance
311 West Washington Street, Suite 300
Indianapolis, Indiana 46204-2787

Dear Commissioner:

Pursuant to the authority vested in Appointment Number 4044 an examination has been made of the affairs and financial condition of:

PacifiCare Life and Health Insurance Company
9800 Health Care Lane MN006-W500
Minnetonka, MN 55343

an Indiana domestic, stock, life and health insurance company hereinafter referred to as the "Company" or "PLHIC". The examination was conducted remotely with support from the corporate offices of the Company.

The Report of Examination, reflecting the status of the Company as of December 31, 2019, is hereby respectfully submitted.

ACCREDITED BY THE NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

AGENCY SERVICES
317-232-2389

COMPANY COMPLIANCE
317-232-3495

CONSUMER SERVICES
317-232-2395/1-800-622-4461

FINANCIAL SERVICES
317-232-2390

MEDICAL MALPRACTICE
317-232-2402

COMPANY RECORDS
317-232-5692

STATE HEALTH INSURANCE PROGRAM
1-800-452-4800

SCOPE OF EXAMINATION

The Company was last examined by representatives of the Indiana Department of Insurance (INDOI) and covered the period from January 1, 2010 through December 31, 2014. The present risk focused examination was conducted by Noble Consulting Services, Inc., and covered the period from January 1, 2015 through December 31, 2019, and included any material transactions and/or events occurring subsequent to the examination date and noted during the course of this examination.

The examination was conducted in accordance with the NAIC *Financial Condition Examiners Handbook* (Handbook). The Handbook requires that we plan and perform the examination to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the Company, and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer's surplus to be materially misstated both currently and prospectively.

Connecticut is the lead regulator for the UnitedHealth Group Incorporated (UHG) and serves as the Lead State. The current examination was called by the State of Connecticut Insurance Department in accordance with the Handbook guidelines, through the NAIC's Financial Examination Electronic Tracking System.

Due to the number of legal entities that are members of UHG and the nature of their operations, the coordinated examination consists of examination subgroups. The examination subgroups are designated by the lead regulator and states appointed to lead these subgroups are known as facilitating states. This coordinated examination was led by the Missouri Department of Commerce and Insurance as a facilitating state. In addition to the INDOI, examiners representing Alabama, Arizona, Colorado, Florida, Illinois, New Mexico, North Carolina, Oklahoma, Oregon, Texas, Washington and Wisconsin participated in the examination.

Karen Elsom, FSA, MAAA, of Lewis & Ellis, Inc., was appointed by the Lead State to provide all actuarial services throughout the examination and conduct a review of the actuarial related risks as of December 31, 2019.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

This examination report includes significant findings of fact, as mentioned in the Indiana Code (IC) 27-1-3.1-10 and general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not included within the examination report but separately communicated to other regulators and/or the Company.

HISTORY

The Company was incorporated on March 1, 1967, under the laws of the state of Indiana, as a life, accident, and health insurer. Operations commenced on September 1, 1967.

The Company is a wholly owned subsidiary of United HealthCare Services, Inc. (UHS). Its ultimate parent company is UHG. UHG is a publicly held company trading on the New York Stock Exchange.

CAPITAL AND SURPLUS

The Company's direct parent, UHS, owns 100% of the Company's issued and outstanding shares of common stock as of the examination date. There were 2,000 authorized shares of common stock with a par value of \$2,000 per share and 1,500 shares issued and outstanding throughout the examination period. The Company has no preferred stock outstanding.

DIVIDENDS TO STOCKHOLDERS

The Company paid the following dividends during the examination period:

<u>Year</u>	<u>Total</u>	<u>Ordinary Dividends</u>	<u>Extraordinary Dividends</u>
2019	-	-	-
2018	3,400,000	3,400,000	-
2017	3,200,000	3,200,000	-
2016	19,700,000	19,700,000	-
2015	-	-	-
Total	<u>26,300,000</u>	<u>26,300,000</u>	<u>-</u>

In accordance with IC 27-1-23-4(h), the payment of dividends to holding companies or affiliated insurers may not exceed the greater of 10% of the prior year's surplus or the net income of such insurer of the prior year. The Company paid three (3) dividends during the examination period that were ordinary in nature and did not require prior regulatory approval. In accordance with IC 27-1-23-1.5, the Company notified the INDOI of all declared dividends to the parent during the examination period.

TERRITORY AND PLAN OF OPERATION

PLHIC is licensed to sell life, accident, and health insurance in all states, the District of Columbia, and the territory of the U.S. Virgin Islands with the exception of New York. The Company provides Medicare Supplement and vision insurance coverage. The Company no longer issues new policies.

GROWTH OF THE COMPANY

The following table summarizes the financial results of the Company during the examination period:

<u>Year</u>	<u>Admitted Assets</u>	<u>Liabilities</u>	<u>Surplus and Other Funds</u>	<u>Premiums Earned</u>	<u>Net Income</u>
2019	\$191,009,467	\$5,026,778	\$185,982,689	\$12,034,067	\$3,632,375
2018	187,485,432	5,095,568	182,389,864	12,808,867	4,314,575
2017	187,324,791	5,844,378	181,480,413	13,594,806	3,393,889
2016	189,203,330	8,366,491	180,836,839	14,261,367	3,225,466
2015	205,672,564	8,307,571	197,364,993	15,773,174	4,132,202

As noted in the Territory and Plan of Operation section above, the Company no longer issues new policies. The decline in earned premiums over the examination period is attributable to no new business being written by the Company.

MANAGEMENT AND CONTROL

Directors

The Bylaws provide that the Company shall be managed by a Board of Directors (Board) comprised of five (5) directors. Every director shall, during his whole term of service, be a citizen of the United States or the Dominion of Canada, and at least one (1) of the directors shall reside in the State of Indiana.

The following is a listing of persons serving as directors as of December 31, 2019, and their principal occupations as of that date:

<u>Name and Address</u>	<u>Principal Occupation</u>
Leslie Johnson Carter Cypress, CA	Vice President, General Management UHG
Brandon Eric Cuevas Santa Ana, CA	Regional Chief Executive Officer UHG
Kimberly Kathleen Sonerholm Indianapolis, IN	Health Plan Chief Executive Officer UHG
Michael Ryan Wei Cypress, CA	Director of Finance UHG
Gregory Scott Wright Santa Ana, CA	Health Plan Chief Executive Officer UHG

Officers

The Bylaws state the officers of the Company shall consist of a President, Secretary and Treasurer.

The following is a list of the officers and their respective titles as of December 31, 2019:

<u>Name</u>	<u>Office</u>
Leslie Johnson Carter	President
Kimberly Dellinger Dunn	Secretary
Peter Marshall Gill	Treasurer

CONFLICT OF INTEREST

Directors and officers are required to review and sign Conflict of Interest statements annually. It was determined that all Directors and Officers listed in the Management and Control section of this Report of Examination have reviewed and signed their statements as of December 31, 2019.

OATH OF OFFICE

IC 27-1-7-10(i) stipulates that every director, when elected, shall take and subscribe to an oath stating that he or she will faithfully, honestly, and diligently administer the affairs of the Company and will not knowingly violate any of the laws applicable to such Company. It was determined that all Directors listed in the Management and Control section of this Report of Examination have subscribed to an oath as of December 31, 2019.

CORPORATE RECORDS

Articles of Incorporation

There were no amendments made to the Articles of Incorporation during the examination period.

Bylaws

There were no amendments made to the Bylaws during the examination period.

Minutes

The Board and shareholders meeting minutes were reviewed for the period under examination through the fieldwork date. Significant actions taken during each meeting were noted.

IC 27-1-7-7(b) states an annual meeting of shareholders, members, or policyholders shall be held within five (5) months after the close of each fiscal year of the Company and at such time within that period as the Bylaws may provide. An annual meeting of Shareholders was not held in 2018, and therefore the Company is not in compliance with IC 27-1-7-7(b). See the Other Significant Issues section in this Report of Examination.

The Audit Committee meeting minutes for the examination period, and through the fieldwork date, were reviewed.

AFFILIATED COMPANIES

Organizational Structure

The following abbreviated organizational chart shows the Company and its affiliated Indiana domiciled companies as of December 31, 2019:

	<u>NAIC Co. Code</u>	<u>Domiciliary State/Country</u>
UnitedHealth Group Incorporated		DE
Golden Rule Financial Corporation		DE
Golden Rule Insurance Company	62286	IN
All Savers Insurance Company	82406	IN
AHN Target Holding, LLC		DE
American Health Network of Indiana, LLC	52623	IN
United HealthCare Services, Inc.		MN
PacifiCare Life and Health Insurance Company	70785	IN

Affiliated Agreements

The following affiliated agreements and transactions were disclosed as part of the Form B – Holding Company Registration Statement and were filed with the INDOI, as required, in accordance with IC 27-1-23-4.

Administrative Services Agreement

Effective January 1, 1999, PLHIC entered into an Administrative Services Agreement with Dental Benefit Providers, Inc., (DBP) (f/k/a PacifiCare Dental and Vision Administrators). Pursuant to this agreement, DBP provides administrative services to PLHIC for insured group dental and vision products.

During the calendar year ended December 31, 2019, PLHIC paid \$379,839 for the services described in this agreement.

Tax Sharing Agreement

Effective December 20, 2005, PLHIC became a party to the Tax Sharing Agreement. The Tax Sharing Agreement establishes a formal method for the allocation and payment of federal, state and local income tax liabilities related to the consolidated federal tax returns of UHG and subsidiaries filed each year.

Effective March 1, 2019, PLHIC entered into the First Amendment to the Tax Sharing Agreement. The Tax Sharing Agreement was amended to reflect that the agreement shall automatically be amended in the event any change in the “Tax Law” (as defined in the agreement) makes any provision of the Agreement invalid or unenforceable.

The tax liability associated with the Agreement for the calendar year 2019 was \$835,361.

Subordinated Revolving Credit Agreement

Effective September 1, 2012, PLHIC entered into a Revolving Credit Agreement with UHG. Under the terms of the Agreement, UHG is providing a short-term borrowing facility for PLHIC. The aggregate principal amount that may be outstanding at any time shall not exceed the lesser of 3% of PLHIC admitted assets or 25% of PLHIC surplus as of the preceding December 31st.

No advances were made under the Agreement in 2019 and there was no outstanding balance under the Agreement as of December 31, 2019.

FIDELITY BOND AND OTHER INSURANCE

The Company protects itself against loss from any fraudulent or dishonest acts by any employees through a fidelity bond issued by Old Republic Insurance Company. The Company is insured for losses up to \$10 million with a \$0 deductible. The fidelity bond coverage limit was adequate to meet the prescribed minimum coverage specified by the NAIC.

PENSION, STOCK OWNERSHIP, AND INSURANCE PLANS

The Company has no defined benefit plans, defined contribution plans, multiemployer plans, consolidated/holding company plans, postemployment benefits, or compensated absences plans and is not impacted by the Medicare Modernization Act on postretirement benefits.

SPECIAL AND STATUTORY DEPOSITS

The Company reported the following deposits as of December 31, 2019:

<u>State</u>	<u>Book Value</u>	<u>Fair Value</u>
For All Policyholders:		
Georgia	\$ 35,215	\$ 35,212
Indiana	1,539,531	1,538,468
North Carolina	413,126	419,647
Virginia	383,211	383,201
All Other Special Deposits:		
Massachusetts	102,190	102,187
Nevada	203,667	204,080
New Hampshire	1,002,623	1,002,320
South Carolina	50,000	50,000
Total Deposits	<u>\$ 3,729,563</u>	<u>\$ 3,735,115</u>

REINSURANCE

The Company does not have any material reinsurance agreements in place as of December 31, 2019.

ACCOUNTS AND RECORDS

The Company's accounting procedures, practices, account records, and supporting data were reviewed and tested to the extent deemed necessary. The trial balances prepared from the Company's general ledger for the years ended December 31, 2018 and December 31, 2019, were agreed to the respective Annual Statements. The Annual Statements for the years ended December 31, 2015 through December 31, 2019, were agreed to each year's independent audit report without material exception. The Company's accounting procedures, practices, and account records were deemed satisfactory.

FINANCIAL STATEMENTS

PACIFICARE LIFE AND HEALTH INSURANCE COMPANY

Assets

As of December 31, 2019

	<u>Per Examination*</u>
Bonds	\$ 178,637,108
Cash, cash equivalents and short-term investments	10,498,278
Receivables for securities	3,098
Subtotals, cash and invested assets	<u>189,138,484</u>
Investment income due and accrued	1,155,477
Premiums and considerations:	
Uncollected premiums and agents' balances in course of collection	273,048
Reinsurance:	
Amounts recoverable from reinsurers	1,689
Current federal and foreign income tax recoverable and interest thereon	9,640
Guaranty funds receivable or on deposit	103,667
Receivables from parent, subsidiaries and affiliates	204,705
Aggregate write-ins for other than invested assets	<u>122,757</u>
Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts	<u>191,009,467</u>
Totals	<u>\$ 191,009,467</u>

* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

PACIFICARE LIFE AND HEALTH INSURANCE COMPANY
Liabilities, Surplus and Other Funds
As of December 31, 2019

	Per Examination*
Aggregate reserve for life contracts	\$ 124,742
Aggregate reserve for accident and health contracts	277,987
Liability for deposit type contracts	
Contract claims:	
Accident and health	1,404,550
Contract liabilities not included elsewhere:	
Provision for experience rating refunds	81,158
Interest maintenance reserve	1,376,336
Commissions to agents due or accrued	56,929
General expenses due or accrued	218,627
Taxes, licenses and fees due or accrued	255,644
Net deferred tax liability	51,492
Remittances and items not allocated	102,851
Borrowed money and interest thereon	908
Miscellaneous liabilities:	
Asset valuation reserve	665,686
Aggregate write-ins for liabilities	409,868
Total liabilities	5,026,778
Common capital stock	3,000,000
Gross paid in and contributed surplus	18,057,274
Aggregate write-ins for special surplus funds	63,172
Unassigned funds (surplus)	164,862,243
Surplus as regards policyholders	185,982,689
Totals	\$ 191,009,467

* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

PACIFICARE LIFE AND HEALTH INSURANCE COMPANY
Statement of Income
For the Year Ended December 31, 2019

	Per Examination*
Premiums and annuity considerations	\$ 12,034,067
Net investment income	4,274,595
Amortization of interest maintenance reserve	267,964
Total	16,576,626
Disability benefits and benefits under accident and health contracts	9,490,358
Increase in aggregate reserves for life and accident	(39,769)
Totals	9,450,589
Commissions on premiums	378,820
General insurance expenses and fraternal expenses	2,020,210
Insurance taxes, licenses and fees	254,792
Aggregate write-ins for deductions	3,563
Totals	12,107,974
Net gain from operations after dividends to policyholders, refunds to members and before federal income taxes	4,468,652
Federal and foreign income taxes incurred	827,487
Net gain from operations after dividends to policyholders, refunds to members and federal income taxes and before realized capital gains or (losses)	3,641,165
Net realized capital gains (losses)	(8,790)
Net income	\$ 3,632,375

* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

PACIFICARE LIFE AND HEALTH INSURANCE COMPANY:
Capital and Surplus Account Reconciliation

	2019	2018	2017	2016	2015
Capital and surplus, December 31 prior year	\$ 182,389,864	\$ 181,480,413	\$ 180,836,839	\$ 197,364,993	\$ 193,270,639
Net income	3,632,375	4,314,575	3,393,889	3,225,466	4,132,202
Change in net deferred income tax	10,541	(23,110)	(612)	23,497	(73,882)
Change in nonadmitted assets	10,331	22,085	(1,371)	(17,533)	111,575
Change in asset valuation reserve	(60,422)	(4,099)	(6,407)	(59,584)	(75,541)
Cumulative effect of changes in accounting principles	-	-	458,075	-	-
Dividends to stockholders	-	(3,400,000)	(3,200,000)	(19,700,000)	-
Net change in capital and surplus for the year	<u>3,592,825</u>	<u>909,451</u>	<u>643,574</u>	<u>(16,528,154)</u>	<u>4,094,354</u>
Capital and surplus, December 31 current year	<u>\$ 185,982,689</u>	<u>\$ 182,389,864</u>	<u>\$ 181,480,413</u>	<u>\$ 180,836,839</u>	<u>\$ 197,364,993</u>

COMMENTS ON THE FINANCIAL STATEMENTS

There were no recommended adjustments to the financial statements as of December 31, 2019, based on the results of this examination.

OTHER SIGNIFICANT ISSUES

IC 27-1-7-7(b) states an annual meeting of Shareholders, Members, or Policyholders shall be held within five (5) months after the close of each fiscal year of the Company and at such time within that period as the Bylaws may provide. An annual meeting of Shareholders was not held in 2018 and therefore the Company is not in compliance with IC 27-1-7-7(b). It is recommended that the Company hold an annual meeting of Shareholders within five (5) months after the close of each fiscal year.

SUBSEQUENT EVENTS

Subsequent to the examination period, John Bry replaced Michael Wei as a Director and as Chief Financial Officer, Stephen Cain replaced Leslie Carter as a Director and as President, and Daniel Rogoff replaced Kimberly Dunn as Secretary.

In March 2020, the World Health Organization declared Coronavirus disease (COVID-19) a pandemic. As of the date of this report, there was significant uncertainty on the effect that the pandemic would have on the insurance industry, economy, and society at large. Any impact to the Company will take time to assess and will be specific to the class and mix of business they underwrite. The Department will continue to monitor how the pandemic might impact the Company.

AFFIDAVIT

This is to certify that the undersigned is a duly qualified Examiner-in-Charge appointed by the Indiana Department of Insurance and that she, in coordination with staff assistance from Noble Consulting Services, Inc., performed an examination of PacifiCare Life and Health Insurance Company, as of December 31, 2019.

The Indiana Department of Insurance is accredited under the National Association of Insurance Commissioners Financial Regulation Accreditation Standards.

This examination was performed in accordance with those procedures required by the NAIC Financial Condition Examiners Handbook and other procedures tailored for this examination. Such procedures performed on this examination do not constitute an audit made in accordance with generally accepted auditing standards and no audit opinion is expressed on the financial statements contained in this report.

The attached Report of Examination is a true and complete report of the condition of PacifiCare Life and Health Insurance Company as of December 31, 2019, as determined by the undersigned.

Elizabeth Nielson
Elizabeth Nielson, CPA, CFE
Noble Consulting Services, Inc.

Under the Supervision of:

Jerry Ehlers
Jerry Ehlers, CFE, AES
Examinations Manager
Indiana Department of Insurance

State of: Indiana
County of: Marion

On this 10th day of June, 2021, before me personally appeared, Elizabeth Nielson and Jerry Ehlers, to sign this document.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal in said County and State, the day and year last above written.

My commission expires: October 4, 2025 Darcy L. Shawver
Notary Public

DARCY L. SHAWVER
NOTARY PUBLIC
SEAL
MARION COUNTY, STATE OF INDIANA
MY COMMISSION EXPIRES OCTOBER 4, 2025
COMMISSION NO 706053

Darcy L. Shawver
Notary Public

