



**DEPARTMENT OF INSURANCE, FINANCIAL  
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

P.O. Box 690, Jefferson City, Mo. 65102-0690

RE: Examination Report of Sunset Life Insurance Company of America for the period ended December 31, 2014

**ORDER**

After full consideration and review of the report of the financial examination of Sunset Life Insurance Company of America for the period ended December 31, 2014, together with any written submissions or rebuttals and any relevant portions of the examiner's workpapers, I, John M. Huff, Director, Missouri Department of Insurance, Financial Institutions and Professional Registration pursuant to section 374.205.3(3)(a), RSMo, adopt such examination report. After my consideration and review of such report, workpapers, and written submissions or rebuttals, I hereby incorporate by reference and deem the following parts of such report to be my findings and conclusions to accompany this order pursuant to section 374.205.3(4), RSMo: summary of significant findings, subsequent events, company history, management and control, territory and plan of operation, reinsurance, financial statements, financial statement changes resulting from the examination, comments on financial statement items, and summary of recommendations.

Based on such findings and conclusions, I hereby ORDER, that the report of the Financial Examination of Sunset Life Insurance Company of America as of December 31, 2014 be and is hereby ADOPTED as filed and for Sunset Life Insurance Company of America to take the following action or actions, which I consider necessary to cure any violation of law, regulation or prior order of the Director revealed by such report: (1) account for its financial condition and affairs in a manner consistent with the Director's findings and conclusions.

So ordered, signed and official seal affixed this 2<sup>nd</sup> day of June 2016.



A handwritten signature in blue ink, appearing to read "John M. Huff", is written over a horizontal line.

John M. Huff, Director  
Department of Insurance, Financial Institutions  
and Professional Registration

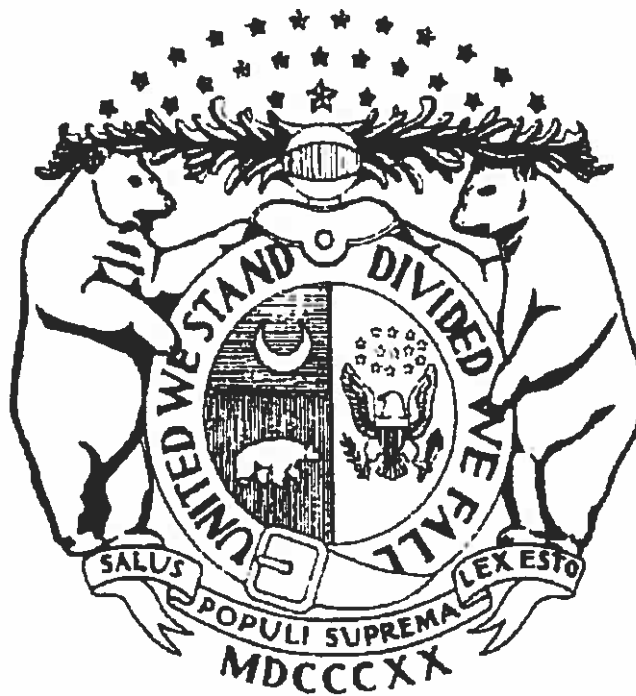
**REPORT OF THE  
FINANCIAL EXAMINATION OF  
SUNSET LIFE INSURANCE  
COMPANY OF AMERICA**

**AS OF  
DECEMBER 31, 2014**

**FILED**

**JUN 13 2016**

**DIRECTOR OF INSURANCE,  
FINANCIAL INSTITUTIONS &  
PROFESSIONAL REGISTRAR**



**STATE OF MISSOURI  
DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS  
AND PROFESSIONAL REGISTRATION  
JEFFERSON CITY, MISSOURI**

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Kansas City, Missouri  
March 24, 2016

Honorable John M. Huff, Director  
Missouri Department of Insurance, Financial Institutions  
and Professional Registration  
301 West High Street, Room 530  
Jefferson City, Missouri 65101

Director Huff:

In accordance with your financial examination warrant, an examination has been made of the records, affairs and financial condition of

**Sunset Life Insurance Company of America**

hereinafter referred to as such, as Sunset Life, or as the Company. Its administrative office is located at 3520 Broadway, Kansas City, Missouri 64111, telephone number (816) 753-7000. This examination began on June 24, 2015 and was completed on the above date.

**SCOPE OF EXAMINATION**

**Period Covered**

The Missouri Department of Insurance, Financial Institutions and Professional Registration (DIFP) performed our multi-state examination of Sunset Life. The last examination covered the period of January 1, 2006 through December 31, 2009. This examination covers the period of January 1, 2010 through December 31, 2014.

This examination was performed concurrently with the examination of the Company's parent, Kansas City Life Insurance Company (Kansas City Life) and an affiliate, Old American Insurance Company (Old American), collectively referred to as the Kansas City Life Insurance Companies or the Companies.

**Procedures**

This examination was conducted in accordance with the National Association of Insurance Commissioners (NAIC) Financial Condition Examiners Handbook (Handbook), except where practices, procedures and applicable regulations of the DIFP and statutes of the State of Missouri prevailed. 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 the Company's surplus to be materially misstated both currently and prospectively.

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 this examination an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

This examination report includes findings of facts and general information about the Company 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.

#### **Reliance Upon Others**

The examination relied upon information provided by the Company and its management. Where deemed appropriate, this information has been tested or verified with external sources. The examination also relied upon information supplied by the Company's independent auditor, KPMG, LLP of Kansas City, Missouri for its audit covering the period from January 1, 2014 through December 31, 2014.

### **SUMMARY OF SIGNIFICANT FINDINGS**

There were no material adverse findings, significant non-compliance issues, or material changes to the financial statements noted during the examination.

### **SUBSEQUENT EVENTS**

On December 15, 2015, shareholders of Kansas City Life Insurance Company voted to approve a reverse/forward stock split transaction. The transaction did not result in a change in control but reduced the number of holders of record for the Company's stock, and permitted the Company to terminate its registration under the Securities Exchange Act of 1934 and suspend its periodic reporting requirements with the Securities and Exchange Commission. The reverse stock split was effective at 6:00 p.m. Central Time on December 16, 2015, and the forward stock split was effective at 6:01 p.m. Central Time on December 16, 2015. Kansas City Life is no longer traded on the NASDAQ exchange and now trades on OTCQX U.S. Premier, which is operated by OTC Markets Group, a centralized electronic quotation service for over-the-counter securities.

## COMPANY HISTORY

### General

Sunset Life Insurance Company of America was incorporated as a stock life insurance company under the laws of the State of Washington on May 12, 1937. The Company was a wholly owned subsidiary of American Underwriters Corporation (AUC), until AUC was voluntarily dissolved in October 1960. Upon dissolution, Sunset Life's shares of stock were distributed to the owners of AUC.

In early 1974, Kansas City Life made a tender offer for all of the outstanding common stock of Sunset Life. As of December 31, 1975, 96.8% of the stock had been purchased. A capital restructuring was completed in December 1990, which resulted in Kansas City Life owning 100% of the outstanding common stock of the Company.

### Dividends

Cash dividends declared and paid to the sole shareholder, Kansas City Life, during the period under examination were as follows: 2010 - \$6,850,000, 2011 - \$6,455,000, 2012 - \$6,715,000, 2013 - \$6,535,000 and 2014 - \$4,835,000.

### Capital Contribution

The Company did not receive any capital contributions during the period under examination.

### Mergers and Acquisitions

The Company was not the subject of an acquisition or merger during the period under examination.

## MANAGEMENT AND CONTROL

### Board of Directors

The management of the Company is vested in a Board of Directors that is elected by the sole shareholder, Kansas City Life Insurance Company. The Company's Bylaws specify that the Board of Directors should consist of at least nine (9) and no more than twenty one (21) members. The Directors elected and serving as of December 31, 2014 were as follows:

| <u>Name</u>        | <u>Address</u>         | <u>Principal Occupation and Business Affiliation</u>         |
|--------------------|------------------------|--|
| R. Phillip Bixby   | Kansas City, Missouri  | Chairman of the Board, President & CEO Kansas City Life      |
| Walter E. Bixby    | Kansas City, Missouri  | Executive Vice President and Vice Chairman, Kansas City Life |
| James P. Bixby     | Kansas City, Missouri  | Assistant Vice President, Sunset Life                        |
| Aaron L. Bush      | Blue Springs, Missouri | Vice President, Kansas City Life                             |
| Nancy Bixby Hudson | Lander, Wyoming        | Director, Kansas City Life                                   |

|                                  |                       |  |
|----------------------------------|-----------------------|--|
| Tracy W. Knapp                   | Overland Park, Kansas | Senior Vice President, Finance, Kansas City Life             |
| Mark A. Milton                   | Kansas City, Missouri | Senior Vice President and Actuary, Kansas City Life          |
| Donald E. Krebs                  | Overland Park, Kansas | Senior Vice President, Marketing and Sales, Kansas City Life |
| Richard D. Ropp                  | Kansas City, Missouri | Vice President, Kansas City Life                             |
| Matthew R. O'Connor <sup>1</sup> | Kansas City, Missouri | Secretary, Sunset Life                                       |

**Committees**

The Company's Bylaws authorize an Executive Committee and any other committees that may be needed. The Investment Committee and the Audit Committee of Kansas City Life performs the investment and audit committee functions for Sunset Life. The established Sunset Life committees and the members elected and serving as of December 31, 2014 were as follows:

**Executive Committee**

R. Philip Bixby, Chairman  
 Walter E. Bixby  
 Mark A. Milton  
 Matthew R. O'Connor<sup>1</sup>

**Nominating Committee**

R. Philip Bixby, Chairman  
 Walter E. Bixby

**Wealth Building Opportunity Planning Committee**

David A. Laird  
 James R. Wilcox  
 Keith L. Kelley

**Officers**

The officers elected and serving as of December 31, 2014 were as follows:

|                                  |                                       |
|----------------------------------|---------------------------------------|
| R. Philip Bixby                  | President & Chairman of the Board     |
| Walter E. Bixby                  | Vice Chairman of the Board            |
| Matthew R. O'Connor <sup>1</sup> | Secretary                             |
| David A. Laird                   | Vice President and Controller         |
| Donald E. Krebs                  | Vice President, Sales and Marketing   |
| Mark A. Milton                   | Vice President and Actuary            |
| Richard D. Ropp                  | Vice President, Policy Administration |

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<sup>1</sup> November 4, 2015, Matthew O'Connor resigned his positions as Secretary and Director of Sunset Life. On December 10, 2015, Mr. Scott Harvison was appointed by the Board to serve the remainder of Mr. O'Connor's term as a Sunset Life Director and Secretary.



**Corporate Records**

The Company's Articles of Incorporation and Bylaws were reviewed for the period under examination. The Articles of Incorporation and Bylaws were not amended during the examination period.

The minutes of the Board of Directors' meetings, committee meetings, and stockholder's meetings were reviewed for proper approval of corporate transactions. In general, the minutes appear to properly reflect and approve the Company's major transactions and events for the period under examination.

**Holding Company, Subsidiaries and Affiliates**

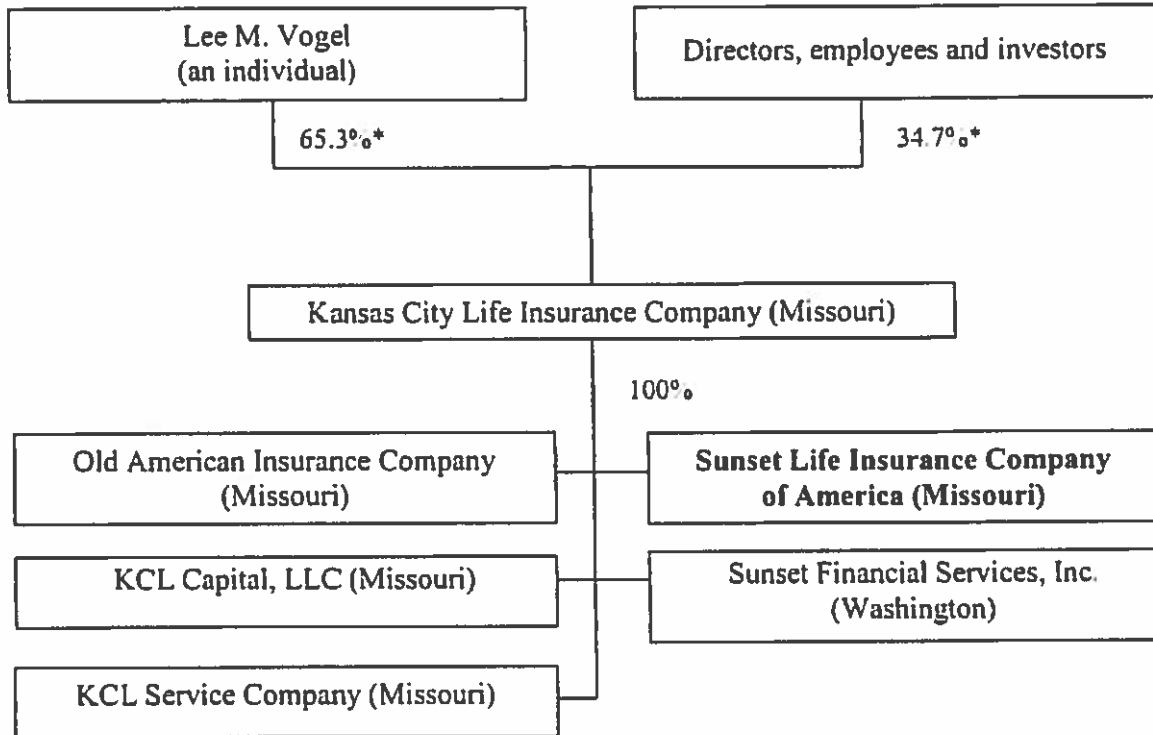
Sunset Life is a member of an Insurance Holding Company System as defined by Section 382.010, RSMo (Definitions). An Insurance Holding Company System Registration Statement was filed by the parent, Kansas City Life, for each year of the examination period on behalf of itself and its subsidiaries, including Sunset Life. The Company is a wholly owned subsidiary of Kansas City Life. Lee M. Vogel, an individual, is the ultimate controlling person within the holding company system of Kansas City Life.

As of December 31, 2014, shares in Kansas City Life were publicly traded on the NASDAQ stock exchange. On December 16, 2015, Kansas City Life amended its Articles of Incorporation creating stock split transactions allowing for a delisting of its shares from the NASDAQ exchange as of January 4, 2016. The Company's shares are now publicly traded on OTCQX, an "Over the Counter" exchange. The transactions leading to the stock delisting are further detailed in the Subsequent Events section of this Report.

The parent, Kansas City Life, is a life and health insurer organized as a Missouri corporation. The holding company system includes another life and health insurer, Old American Insurance Company, and as of December 31, 2014, three other affiliates that are related in part or entirely to the insurance operations. Sunset Financial Services, Inc., a Washington corporation, markets all of Kansas City Life's variable products and performs investment services for policyholders. The other subsidiaries are currently inactive or do not have any significant operations.

**Organizational Chart**

The following organizational chart depicts Sunset Life’s ownership and holding company structure as of December 31, 2014:



\*Due to the Company’s reverse and forward stock splits on December 16, 2015, the ownership percentages have subsequently changed to 73.1% for Mr. Vogel and 26.9% for Directors, employees and investors.

**Intercompany Agreements**

The Company is a party to the intercompany agreements outlined below.

1. **Type:** Tax Allocation Agreement
- Parties:** Kansas City Life, Old American, Sunset Life and the wholly owned non-life insurance companies.
- Effective:** December 31, 2008
- Terms:** A consolidated federal income tax return is filed each year. The portion of the consolidated tax liability that is allocated to each company is based upon the subsidiary’s tax liability on a stand-alone basis.

- 2. Type:** Intercompany Affiliate Service Agreement  
**Parties:** Kansas City Life and Sunset Life  
**Effective:** August 1, 2009  
**Terms:** The agreement is effective for five years unless otherwise terminated upon 30 days' notice by either party prior to the expiration. Services to be performed include, but are not limited to: accounting, tax, auditing, underwriting, claims, investments, and functional support services. Each party agrees to reimburse the other for services and facilities provided under this agreement.
- 3. Type:** Loan Guaranty  
**Parties:** Kansas City Life and Sunset Life  
**Effective:** August 4, 1999  
**Terms:** Kansas City Life has guaranteed the indebtedness of Sunset Life on borrowings under a UMB Bank \$20,000,000 Line of Credit.
- 4. Type:** Guaranty  
**Parties:** Kansas City Life and Sunset Life  
**Effective:** Various dates  
**Terms:** Kansas City Life has guaranteed to several states that the capital and surplus of Sunset Life will not fall below the stated minimum.
- 5. Type:** Inter-Company Retained Asset Program for Benefit Payments  
**Parties:** Kansas City Life and Sunset Life  
**Effective:** January 1, 2006  
**Terms:** Certain benefit payments for all parties will be paid through a Kansas City Life corporate account maintained with State Street Bank and BISYS (State Street). Through Kansas City Life's contract with State Street, retained asset checking accounts are established for beneficiaries of death claims and cash surrenders in excess of \$10,000 for each of the parties to this agreement. Accounts are identified for each company based on branch codes built into the beneficiary's checking account number. When beneficiaries submit checks for payment they are paid from the State Street account. The amounts paid out to the beneficiaries are tracked through the account numbers and shown on each individual company's account as each company funds the account for their respective disbursement liabilities. In addition, bank service fees will be paid by each party based on their proportional share of the fees. Fees identified by the respective branch code of the account as being incurred by one party will be paid by that party.

## TERRITORY AND PLAN OF OPERATION

Sunset Life Insurance Company of America is licensed by the Missouri Department of Insurance, Financial Institution and Professional Registration under Chapter 376 RSMo (Life, Health and Accident Insurance) to provide the following kinds of insurance: life, accident and health (A&H), and variable contracts. As of December 31, 2014, the Company was licensed to transact business in 43 states and the District of Columbia.

Sunset Life maintains its current block of business, but does not produce new sales. Sunset Life is included in the Individual Insurance segment of Kansas City Life and its individual insurance products include traditional and interest sensitive products.

## REINSURANCE

### General

The Company's premium activity, in thousands, on a direct, assumed and ceded basis for the period under examination is detailed below:

|                      | <u>2014</u>            | <u>2013</u>            | <u>2012</u>            | <u>2011</u>            | <u>2010</u>            |
|----------------------|------------------------|------------------------|------------------------|------------------------|------------------------|
| Direct Business      | \$26,432               | \$26,171               | \$21,105               | \$25,056               | \$24,714               |
| Reinsurance Assumed: |                        |                        |                        |                        |                        |
| Affiliates           | 0                      | 0                      | 0                      | 0                      | 0                      |
| Non-affiliates       | 0                      | 0                      | 0                      | 0                      | 0                      |
| Reinsurance Ceded:   |                        |                        |                        |                        |                        |
| Affiliates           | (424)                  | (405)                  | (382)                  | (386)                  | (395)                  |
| Non-affiliates       | (10,045)               | (10,434)               | (10,743)               | (12,311)               | (12,528)               |
| <b>Net Premiums</b>  | <b><u>\$15,963</u></b> | <b><u>\$15,332</u></b> | <b><u>\$ 9,980</u></b> | <b><u>\$12,359</u></b> | <b><u>\$11,790</u></b> |

### Assumed

The Company did not assume any business during the period under examination.

### Ceded

Sunset Life is contingently liable for all reinsurance losses ceded or retroceded to others. This contingent liability would become an actual liability in the event that an assuming reinsurer fails to perform its obligations under the reinsurance agreement.

Sunset Life cedes business under various reinsurance arrangements with affiliated and unaffiliated insurers. Reinsurance is primarily used to reinsure mortality risks in excess of the Company's retention and also to help manage statutory capital. Reinsurance is also ceded on a facultative basis to utilize the underwriting expertise of the reinsurer and to assist with additional capacity. The maximum retention on an individual life is \$350,000.

Historically, mortality risks exceeding the Company's retention have been ceded to a reinsurance pool. In 2001, new universal life plans were reinsured on a quota share yearly renewable term basis ("YRT") whereby the Company ceded up to 80% of the mortality risk. Effective January 1, 2002, Sunset Life reinsured 80% of the retained mortality risk on the in-force block under a YRT reinsurance agreement to a pool of four reinsurers.

In 1994, the Company introduced a series of level term products. The plans were coinsured on a quota share basis whereby the Company ceded 80% of the business. The primary purpose was to reduce the capital impact of the associated reserves. Beginning in 2000, the level term plans were ceded on a 90% quota share basis.

### **FINANCIAL STATEMENTS**

The following financial statements are based on the statutory financial statements filed by the Company with the DIFP and present the financial condition of Sunset Life Insurance Company of America for the period ending December 31, 2014. The accompanying comments on financial statements reflect any examination adjustments to the amounts reported in the annual statement and should be considered integral part of the financial statements.

**Assets**

|   | <u>Assets</u>               | <u>Non-Admitted Assets</u> | <u>Net Admitted Assets</u>  |
|---|-----------------------------|----------------------------|-----------------------------|
| Bonds   | \$ 270,390,986              | \$ 0                       | \$270,390,986               |
| Preferred Stocks  | 2,207,305                   | 0                          | 2,207,305                   |
| Common Stocks   | 429,500                     | 0                          | 429,500                     |
| Mortgage Loans on Real Estate                                     | 58,517,398                  | 0                          | 58,517,398                  |
| Cash, Cash Equivalents and Short-term Investments                 | 6,588,746                   | 0                          | 6,588,746                   |
| Contract Loans  | 8,816,278                   | 216                        | 8,816,062                   |
| Other Invested Assets   | 154,492                     | 100,417                    | 54,075                      |
| Receivable for Securities   | 179,626                     | 0                          | 179,626                     |
| Investment Income Due and Accrued                                 | 3,415,804                   | 2,901                      | 3,412,903                   |
| Premiums and Considerations:                                      |                             |                            |                             |
| Uncollected Premiums and Agents' Balances in Course of Collection | 190                         | 0                          | 190                         |
| Deferred Premiums and Agents' Balances                            | 481,960                     | 0                          | 481,960                     |
| Reinsurance:  |                             |                            |                             |
| Amounts Recoverable from Reinsurers                               | 1,290,054                   | 150                        | 1,289,904                   |
| Other Amounts Receivable Under Reinsurance                        | 11,334                      |                            | 11,334                      |
| Net Deferred Tax Assets   | 2,910,288                   | 1,291,852                  | 1,618,436                   |
| Guaranty Funds Receivable or on Deposit                           | 101,890                     | 0                          | 101,890                     |
| Aggregate Write-ins for Other Assets:                             |                             |                            |                             |
| Other Assets  | 48,232                      | 25                         | 48,207                      |
| <b>TOTAL ASSETS</b>   | <b><u>\$355,544,083</u></b> | <b><u>\$1,395,561</u></b>  | <b><u>\$354,148,522</u></b> |

**Liabilities, Surplus and Other Funds**

|  |                       |
|--|-----------------------|
| Aggregate Reserve for Life Contracts                                       | \$ 295,616,762        |
| Aggregate Reserve for Accident and Health Contracts                        | 5,050                 |
| Liability for Deposit-type Contract  | 4,304,168             |
| Contract Claims: Life  | 1,352,913             |
| Contract Claims: Accident and Health                                       | 5,565                 |
| Policyholders' Dividends and Coupons Due and Unpaid                        | 27                    |
| Provision for Policyholders' Dividends and Coupons Apportioned for Payment | 46,800                |
| Provision for Policyholders' Dividends and Coupons and Similar Benefits    | 2,500                 |
| Advance Premium  | 23,295                |
| Interest Maintenance Reserve   | 2,603,698             |
| Commissions to Agents Due or Accrued                                       | 31,708                |
| General Expenses Due or Accrued  | 24,000                |
| Taxes, Licenses and Fees   | 200,000               |
| Current Federal Income Taxes   | 165,493               |
| Unearned Investment Income   | 33,812                |
| Amounts Withheld or Retained by Company                                    | 12,923,722            |
| Remittances and Items not Allocated  | 1,264,772             |
| Liability for Benefits for Employees and Agents                            | 1,000,423             |
| Asset Valuation Reserve  | 2,275,000             |
| Payable to Parent, Subsidiaries and Affiliates                             | 101,685               |
| Aggregate Write-ins for Liabilities  | 131,238               |
| <b>TOTAL LIABILITIES</b>   | <b>\$ 322,112,631</b> |
| Common Capital Stock   | 5,320,000             |
| Gross paid in and Contributed Surplus                                      | 12,717,600            |
| Unassigned Funds (Surplus)   | 13,998,294            |
| <b>TOTAL SURPLUS</b>   | <b>26,715,894</b>     |
| <b>TOTAL CAPITAL AND SURPLUS</b>   | <b>32,035,894</b>     |
| <b>TOTAL LIABILITIES AND SURPLUS</b>                                       | <b>\$ 354,148,525</b> |

**Statement of Income**

|  |                             |
|--|-----------------------------|
| Premiums and Annuity Considerations                                  | \$ 15,963,299               |
| Considerations for Supplementary Contracts                           | 1,852,940                   |
| Net Investment Income  | 16,409,779                  |
| Amortization of Interest Maintenance Reserve                         | 383,701                     |
| Commissions and Expense Allowance on Reinsurance Ceded               | 244,589                     |
| Aggregate Write-ins for Miscellaneous Income                         | 657                         |
| <b>TOTAL</b>   | <b><u>\$ 34,854,965</u></b> |
| Death Benefits   | 4,620,720                   |
| Matured Endowments   | 80,312                      |
| Annuity Benefits   | 14,088,625                  |
| Disability Benefits and Benefits Under Accident and Health Contracts | 124,729                     |
| Coupons, Guaranteed Annual Pure Endowments and Similar Benefits      | 2,510                       |
| Surrender Benefits and Withdrawals for Life Contracts                | 8,132,420                   |
| Interest and Adjustments on Contracts for Deposit-type Funds         | 261,248                     |
| Payments on Supplementary Contracts with Life Contingencies          | 1,016,568                   |
| Increase in Aggregate Reserves for Life and Accident and Health      | (4,501,673)                 |
| Commissions on Premiums, Annuity Considerations and Deposit Funds    | 320,485                     |
| General Insurance Expenses   | 3,055,303                   |
| Insurance Taxes, Licenses and Fees                                   | 382,612                     |
| Increase in Loading on Deferred and Uncollected Premiums             | 1,171                       |
| Aggregate Write-ins for Deductions                                   | 56,449                      |
| <b>TOTAL</b>   | <b><u>\$ 27,641,479</u></b> |
| Net Gain Before Dividends to Policyholders and Federal Income Taxes  | 7,213,486                   |
| Dividends to Policyholders   | 50,193                      |
| Federal and Foreign Income Taxes Incurred                            | 1,810,472                   |
| Net Realized Capital Loss  | (979,493)                   |
| <b>Net Income</b>  | <b><u>\$ 4,373,328</u></b>  |



**Capital and Surplus Account**

|   |                      |
|---|----------------------|
| Capital and Surplus, December 31, 2013                    | \$ 31,198,207        |
| Net Income  | 4,373,328            |
| Change in Net Unrealized Capital Gains and (Losses)       | 19,023               |
| Change in Net Deferred Income Tax                         | (352,822)            |
| Change in Nonadmitted Assets                              | 830,261              |
| Change in Reserve on Account of Charge in Valuation Basis | (22,108)             |
| Change in Asset Valuation Reserve                         | 825,000              |
| Dividends to Stockholders                                 | (4,835,000)          |
| Net Change in Capital and Surplus                         | <u>\$ 837,682</u>    |
| Capital and Surplus at December 31, 2014                  | <u>\$ 32,035,889</u> |

**FINANCIAL STATEMENT CHANGES RESULTING FROM THE EXAMINATION**

None

**COMMENTS ON FINANCIAL STATEMENT ITEMS**

None

**SUMMARY OF RECOMMENDATIONS**

None

**ACKNOWLEDGMENT**

The assistance and cooperation extended by the officers and the employees of Sunset Life Insurance Company of America during the course of this examination is hereby acknowledged and appreciated. In addition to the undersigned, Vicki L. Denton, CFE, Karen Baldree, CPA, CFE, Laura L. Church, CPA, CFE, Emily Pennington, AFE, and Stephen Shahlari, CPA, examiners for the Missouri DIFP also participated in this examination. Kimberly Dobbs, CFE, AES, Information System Examiner for the DIFP, performed a review of the information system environment. The actuarial firm of Miller & Newberg, Consulting Actuaries, of Overland Park, Kansas also participated as consulting actuaries.

**VERIFICATION**


State of Missouri )  
  )  
County of                    )

I, Levi N. Nwasoria, on my oath swear that to the best of my knowledge and belief the above examination report is true and accurate and is comprised of only facts appearing upon the books, records or other documents of Sunset Life Insurance Company of America its agents or other persons examined or as ascertained from the testimony of its officers or agents or other persons examined concerning its affairs and such conclusions and recommendations as the examiners find reasonably warranted from the facts.



Levi N. Nwasoria, CPA, CFE  
Examiner-In-Charge  
Missouri DIFP

Sworn to and subscribed before me this 30<sup>th</sup> day of March 2016.

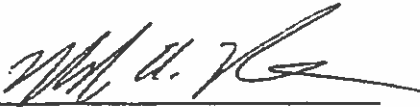
My commission expires: 01/07/2018   
Notary Public



TAMMY MORALES  
My Commission Expires  
January 7, 2018  
Clay County  
Commission #14451086

**SUPERVISION**

The examination process has been monitored and supervised by the undersigned. The examination report and supporting workpapers have been reviewed and approved. Compliance with NAIC procedures and guidelines as contained in the Financial Condition Examiners Handbook has been confirmed.



Mark A. Nance, CPA, CFE  
Audit Manager  
Missouri DIFP