ACTUARIAL OPINION AND MEMORANDUM & RISK BASED CAPITAL CHECKLIST

December 31, 2025

Instructions: **This checklist must be submitted from the Appointed Actuary's e-mail account to the Albany Life Bureau by March 1st. This submission should be independent of all other submission materials. Separate e-mail should be submitted for each legal entity. The subject line of the e-mail should include: COMPANY NAME, NAIC CODE, AND "AOM CHECKLIST". If the Company is granted an extension for an initial memorandum filing, enter "on extension until [extension date]" in the source file(s) field. An updated Checklist should accompany the submission of all files on extension. Note: Extensions only apply to Actuarial Memoranda; Actuarial Opinions must be filed by March 1st.**

Company Name_____

NAIC Code _____ Appointed Actuary _____.

REGULATION 126 ACTUARIAL OPINION & MEMORANDUM SUBMISSION

Under which Section did the Company file their Regulation 126 Actuarial Opinion? (Section 95.7 or 95.8) _____

If filing a 95.8 Actuarial Opinion, did you receive an extension for filing your Actuarial Memorandum? _____

If you received an extension, provide the date of the Department's approval and identify the name and location of the source file for the Summary of Results of the Company's Asset Adequacy Analysis.

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REGULATION 127, 128, 136, 147, 179, and PBR SUBMISSIONS

Does the Company have any market value adjusted (MVA) annuities on their books? _____

If yes, under which Section did the Company establish reserves for their MVA annuities? (44.11(b), (c) or (d)) _____

Please note: Companies that establish reserves for MVA annuities in accordance with Sections 44.11(b) or 44.11(c) are required to file a Regulation 127 Actuarial Opinion and Memorandum.

Is the Company required to file a Regulation 128 Actuarial Opinion & Memorandum? _____

Is the Company required to file a Regulation 136 Actuarial Opinion & Memorandum? _____

Is the Company required to file a Regulation 147 X-Factor Actuarial Opinion & Report? _____

Does the Company have Universal Life with Secondary Guarantees which is subject to Section 98.9(c)(2)(viii)(j) of Regulation 147? If yes, a Stand-alone Asset Adequacy Analysis (AAA) is required. _____

Does the Company use the 2001 CSO Preferred Mortality Tables to establish reserves for any of its policies? _____

(If yes, the Company is required to file an actuarial certification and accompanying report per Section 100.10(b) of Regulation 179)

Has the Company filed a PBR Actuarial Report consistent with VM-31? _____

Is the Company required to file an Variable Annuity Option Value Floor Report under Section 103.6(e)(5)(ii) of Regulation 213? _____

For all Actuarial Opinions and Memoranda filed, complete the chart below. Use separate lines for Opinion and Memorandum documents. "Source files" should include the file name and location (e.g., CD #1, e-mail, etc.). Additional rows may be added as necessary.

Reg. #	Business	Opining Actuary	Date Signed	Confidentiality Requested?(Y/N)	Source File(s)
126 Opinion					
126 Memo					
127 Opinion					
127 Memo					
128 Opinion					
128 Memo					
136 Opinion					
136 Memo					
147 X-Factor Opinion					
147 X-Factor Report					
147 Stand-alone ULSG Opinion					
147 Stand-alone AAA					
179 Certification					
179 Report					
AG 43 Certification					
AG 43 Memo					
AG43 Management Certification					
VM-31 PBR Report[1]					
VA Option Value Floor Report					

[1]This should be the full VM31 report (Executive Summary, Life Summary, Life Report, VA Summary, VA Report) and discuss any additional amounts held in excess of the Valuation Manual per Regulation 213.

RISK BASED CAPITAL

Was the Company required to perform C-3 Phase I testing for Life Risk Based Capital? _____

Was the Company required to perform C-3 Phase II testing for Life Risk Based Capital? _____

SPECIAL CONSIDERATIONS LETTER RESPONSE

Identify the location of the response to the Department's Special Considerations Letter for 12/31/2025 Reserves

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GUIDANCE

Questions concerning this checklist should be directed via e-mail to Matthew Ryan, (Supervising Actuary – Life) or by phone at (518) 474–7929.

AOMCHKLST