

Form **990**
Department of the Treasury
Internal Revenue Service

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047
2021
Open to Public Inspection

A For the 2021 calendar year, or tax year beginning 01-01-2021, and ending 12-31-2021

B Check if applicable:
 Address change
 Name change
 Initial return
 Final return/terminated
 Amended return
 Application pending

C Name of organization: GUARANTY ASSOCIATION BENEFITS COMPANY
 Doing business as:
 Number and street (or P.O. box if mail is not delivered to street address) Room/suite: FAEGRE DRINKER 1500 K ST NW 1100
 City or town, state or province, country, and ZIP or foreign postal code: WASHINGTON, DC 20005

D Employer identification number: 45-3635388

E Telephone number: (202) 802-1917

F Name and address of principal officer: LYNDA LOOMIS, FAEGRE DRINKER 1500 K ST NW 1100, WASHINGTON, DC 20005

G Gross receipts \$ 2,692,453,856

H(a) Is this a group return for subordinates? Yes No
H(b) Are all subordinates included? Yes No
 If "No," attach a list. See instructions.
H(c) Group exemption number ▶

I Tax-exempt status: 501(c)(3) 501(c)(6) ◀ (insert no.) 4947(a)(1) or 527

J Website: ▶ WWW.GABENEFITSCO.COM

K Form of organization: Corporation Trust Association Other ▶

L Year of formation: 2011 **M** State of legal domicile: DC

Part I Summary

1 Briefly describe the organization's mission or most significant activities:
 THE ORGANIZATION OPERATES TO PROTECT, IN ACCORDANCE WITH A COURT-APPROVED LIQUIDATION PLAN, INDIVIDUALS RELYING UPON ANNUITIES ISSUED BY INSOLVENT EXECUTIVE LIFE INSURANCE COMPANY OF NEW YORK, IN FURTHERANCE OF THE COMMON INTERESTS OF THE STATE GUARANTY ASSOCIATIONS AND THEIR MEMBERS.

2 Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets.

3 Number of voting members of the governing body (Part VI, line 1a)	3	7
4 Number of independent voting members of the governing body (Part VI, line 1b)	4	7
5 Total number of individuals employed in calendar year 2021 (Part V, line 2a)	5	0
6 Total number of volunteers (estimate if necessary)	6	0
7a Total unrelated business revenue from Part VIII, column (C), line 12	7a	0
7b Net unrelated business taxable income from Form 990-T, Part I, line 11	7b	0

	Prior Year	Current Year
8 Contributions and grants (Part VIII, line 1h)	0	0
9 Program service revenue (Part VIII, line 2g)	0	0
10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)	59,870,876	52,395,571
11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)	929,979	1,851,951
12 Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	60,800,855	54,247,522
13 Grants and similar amounts paid (Part IX, column (A), lines 1–3)	0	0
14 Benefits paid to or for members (Part IX, column (A), line 4)	0	0
15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)	406,522	436,254
16a Professional fundraising fees (Part IX, column (A), line 11e)	0	0
b Total fundraising expenses (Part IX, column (D), line 25) ▶ 0		
17 Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e)	46,267,218	44,686,085
18 Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)	46,673,740	45,122,339
19 Revenue less expenses. Subtract line 18 from line 12	14,127,115	9,125,183

	Beginning of Current Year	End of Year
20 Total assets (Part X, line 16)	1,654,485,818	1,687,230,547
21 Total liabilities (Part X, line 26)	1,533,460,123	1,557,392,017
22 Net assets or fund balances. Subtract line 21 from line 20	121,025,695	129,838,530

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer: *****
 Date: 2022-11-15

LYNDA LOOMIS VICE PRES OPERATIONS
 Type or print name and title

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN P00200641
Firm's name ▶ EISNER ADVISORY GROUP LLC			Firm's EIN ▶ 87-1353108	
Firm's address ▶ 111 WOOD AVENUE SOUTH ISELIN, NJ 088302700			Phone no. (732) 243-7000	

May the IRS discuss this return with the preparer shown above? (see instructions) Yes No

Part III Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III

1 Briefly describe the organization's mission:

THE ORGANIZATION OPERATES TO PROTECT, IN ACCORDANCE WITH A COURT-APPROVED LIQUIDATION PLAN, INDIVIDUALS RELYING UPON ANNUITIES ISSUED BY INSOLVENT EXECUTIVE LIFE INSURANCE COMPANY OF NEW YORK, IN FURTHERANCE OF THE COMMON INTERESTS OF THE STATE GUARANTY ASSOCIATIONS AND THEIR MEMBERS.

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? Yes No

If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? Yes No

If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code:) (Expenses \$ 82,317,204 including grants of \$) (Revenue \$)
See Additional Data

4b (Code:) (Expenses \$ including grants of \$) (Revenue \$)

4c (Code:) (Expenses \$ including grants of \$) (Revenue \$)

4d Other program services (Describe in Schedule O.)
(Expenses \$ including grants of \$) (Revenue \$)

4e Total program service expenses ▶ 82,317,204

Part IV Checklist of Required Schedules

		Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A		No
2	Is the organization required to complete Schedule B, Schedule of Contributors? See instructions.		No
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I		No
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II		
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Rev. Proc. 98-19? If "Yes," complete Schedule C, Part III		No
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I		No
7	Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II		No
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III		No
9	Did the organization report an amount in Part X, line 21 for escrow or custodial account liability; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV		No
10	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi endowments? If "Yes," complete Schedule D, Part V		No
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable.		
11a	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI	Yes	
11b	Did the organization report an amount for investments—other securities—in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII		No
11c	Did the organization report an amount for investments—program related—in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII		No
11d	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX		No
11e	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	Yes	
11f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	Yes	
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	Yes	
12b	Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional		No
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E		No
14a	Did the organization maintain an office, employees, or agents outside of the United States?		No
14b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV		No
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV		No
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV		No
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I. See instructions.		No
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II		No
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III		No
20a	Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H		No
20b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II		No

Part IV Checklist of Required Schedules (continued)

		Yes	No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? <i>If "Yes," complete Schedule I, Parts I and III</i>		No
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5, about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J</i>	Yes	
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a</i>		No
24b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?		
24c	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?		
24d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?		
25a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I</i>		
25b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I</i>		
26	Did the organization report any amount on Part X, line 5 or 22 for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? <i>If "Yes," complete Schedule L, Part II</i>		No
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? <i>If "Yes," complete Schedule L, Part III</i>		No
28	Was the organization a party to a business transaction with one of the following parties (see the Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
28a	A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? <i>If "Yes," complete Schedule L, Part IV</i>	Yes	
28b	A family member of any individual described in line 28a? <i>If "Yes," complete Schedule L, Part IV</i>		No
28c	A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? <i>If "Yes," complete Schedule L, Part IV</i>	Yes	
29	Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M</i>		No
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M</i>		No
31	Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I</i>		No
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II</i>		No
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I</i>		No
34	Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1</i>		No
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?		No
35b	If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2</i>		
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2</i>		
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI</i>		No
38	Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19? Note. All Form 990 filers are required to complete Schedule O.	Yes	

Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V

		Yes	No
1a	Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable		
1b	Enter the number of Forms W-2G included on line 1a. Enter -0- if not applicable		
1c	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	Yes	

Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

2a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return. 2a 0
b If at least one is reported on line 2a, did the organization file all required federal employment tax returns? Note. If the sum of lines 1a and 2a is greater than 250, you may be required to e-file. See instructions. 2b
3a Did the organization have unrelated business gross income of \$1,000 or more during the year? 3a No
b If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O. 3b
4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)? 4a No
b If "Yes," enter the name of the foreign country: See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).
5a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year? 5a No
b Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction? 5b No
c If "Yes," to line 5a or 5b, did the organization file Form 8886-T? 5c
6a Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions? 6a No
b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? 6b
7 Organizations that may receive deductible contributions under section 170(c).
a Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor? 7a
b If "Yes," did the organization notify the donor of the value of the goods or services provided? 7b
c Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282? 7c
d If "Yes," indicate the number of Forms 8282 filed during the year. 7d
e Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? 7e
f Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? 7f
g If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required? 7g
h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C? 7h
8 Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year? 8
9 Sponsoring organizations maintaining donor advised funds.
a Did the sponsoring organization make any taxable distributions under section 4966? 9a
b Did the sponsoring organization make a distribution to a donor, donor advisor, or related person? 9b
10 Section 501(c)(7) organizations. Enter:
a Initiation fees and capital contributions included on Part VIII, line 12. 10a
b Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities. 10b
11 Section 501(c)(12) organizations. Enter:
a Gross income from members or shareholders. 11a
b Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.) 11b
12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041? 12a
b If "Yes," enter the amount of tax-exempt interest received or accrued during the year. 12b
13 Section 501(c)(29) qualified nonprofit health insurance issuers.
a Is the organization licensed to issue qualified health plans in more than one state? Note. See the instructions for additional information the organization must report on Schedule O. 13a
b Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans. 13b
c Enter the amount of reserves on hand. 13c
14a Did the organization receive any payments for indoor tanning services during the tax year? 14a No
b If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O. 14b
15 Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? If "Yes," see the instructions and file Form 4720, Schedule N. 15 No
16 Is the organization an educational institution subject to the section 4968 excise tax on net investment income? If "Yes," complete Form 4720, Schedule O. 16 No
17 Section 501(c)(21) organizations. Did the trust, any disqualified person, or mine operator engage in any activities that would result in the imposition of an excise tax under section 4951, 4952, or 4953? If "Yes," complete Form 6069. 17

Part VI Governance, Management, and Disclosure. For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions. Check if Schedule O contains a response or note to any line in this Part VI



Section A. Governing Body and Management

Table with 3 columns: Question, Yes, No. Rows include: 1a (7), 1b (7), 2, 3, 4, 5, 6, 7a, 7b, 8a, 8b, 9.

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

Table with 3 columns: Question, Yes, No. Rows include: 10a, 10b, 11a, 11b, 12a, 12b, 12c, 13, 14, 15a, 15b, 16a, 16b.

Section C. Disclosure

- 17 List the states with which a copy of this Form 990 is required to be filed
18 Section 6104 requires an organization to make its Form 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.
19 Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.
20 State the name, address, and telephone number of the person who possesses the organization's books and records:

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
- List all of the organization's **current** key employees, if any. See the instructions for definition of "key employee."
- List the organization's five **current** highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (box 5 of Form W-2, Form 1099-MISC, and/or box 1 of Form 1099-NEC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's **former** officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.

See the instructions for the order in which to list the persons above.

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC/1099-NEC)	(E) Reportable compensation from related organizations (W-2/1099-MISC/1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
(1) PETER G GALLANIS DIRECTOR, PRESIDENT	10.00	X		X				85,375	0	5,571
(2) THOMAS F ENGLISH DIRECTOR-MEMBER ELECT. THRU 10/24/21	1.00	X						0	0	0
(3) JOHN J FALKENBACH DIRECTOR-MEMBER ELECT. THRU 10/24/21	12.00	X		X				0	0	0
(4) JAMES F DONNELLAN DIRECTOR-MEMBER ELECTED	1.00	X						0	0	0
(5) JOHN E DEITELBAUM DIRECTOR-MEMBER ELECTED	1.00	X						0	0	0
(6) G THOMAS SULLIVAN DIRECTOR, SECRETARY ELECT. 10/27/21	10.00	X		X				0	0	0
(7) GERMAINE L MARKS DIRECTOR - MEMBER ELECTED	1.00	X						0	0	0
(8) ERIK A ANDERSON DIRECTOR - MEMBER ELECTED 10/25/21	1.00	X						0	0	0
(9) MAGARET SPERRY DIRECTOR - MEMBER ELECTED 10/25/21	1.00	X						0	0	0
(10) LYNDA G LOOMIS VICE PRESIDENT OPERATIONS	23.00			X				345,308	0	0
(11) JOHN C COLPEAN TREASURER THRU 12/31/21, CHAIRMAN	10.00			X				0	0	0
(12) PAMELA E OLSEN TREASURER APPOINTED 12/31/21	10.00			X				0	0	0

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)										
(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC/1099-NEC)	(E) Reportable compensation from related organizations (W-2/1099-MISC/1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
1b Sub-Total										
c Total from continuation sheets to Part VII, Section A										
d Total (add lines 1b and 1c)							430,683	0	5,571	

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization **▶** 1

	Yes	No
3 Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? <i>If "Yes," complete Schedule J for such individual</i>		No
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? <i>If "Yes," complete Schedule J for such individual</i>	Yes	
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? <i>If "Yes," complete Schedule J for such person</i>	Yes	

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
LEGAL & GENERAL INVEST MGMT AMERICA INC 71 S WACKER STREET STE 800 CHICAGO, IL 60606	INVESTMENT MGMT.	1,856,315
NISA INVESTMENT ADVISORS LLC 101 S HANLEY ROAD STE 1700 ST LOUIS, MO 63105	INVESTMENT ADVISORS	1,134,377
FAEGRE DRINKER BIDDLE & REATH LLC 300 N MERIDIAN STREET STE 2500 INDIANAPOLIS, IN 46204	LEGAL SERVICES	576,863
COMPUTER SCIENCES CORP PO BOX 8500-52283 PHILADELPHIA, PA 19178	3RD PTY. ADMIN.	536,183
LYNDA G LOOMIS C/O FAEGRE DRINKER 1500 K ST NW WASHINGTON, DC 20005	VP OF OPERATIONS	345,308

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization **▶** 5

Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII

Table with columns (A) Total revenue, (B) Related or exempt function revenue, (C) Unrelated business revenue, (D) Revenue excluded from tax under sections 512 - 514. Rows include Contributions, Gifts, Grants and Other Similar Amounts (1a-1g), Program Service Revenue (2a-2f), Other Revenue (3-12), and Total revenue (12).

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX

Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21				
2 Grants and other assistance to domestic individuals. See Part IV, line 22				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16.				
4 Benefits paid to or for members				
5 Compensation of current officers, directors, trustees, and key employees	436,254			
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)				
7 Other salaries and wages				
8 Pension plan accruals and contributions (include section 401 (k) and 403(b) employer contributions)				
9 Other employee benefits				
10 Payroll taxes				
11 Fees for services (non-employees):				
a Management	245,436			
b Legal	576,863			
c Accounting	363,210			
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees	3,267,467			
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	529,125			
12 Advertising and promotion				
13 Office expenses	65,540			
14 Information technology				
15 Royalties				
16 Occupancy				
17 Travel	1,741			
18 Payments of travel or entertainment expenses for any federal, state, or local public officials				
19 Conferences, conventions, and meetings				
20 Interest	225			
21 Payments to affiliates				
22 Depreciation, depletion, and amortization	173			
23 Insurance	437,334			
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a ANNUITY BENEFITS PAYMEN	82,317,204			
b LICENSES AND PERMITS	96,274			
c DATA PROCESSING	43,291			
d INT & PEN ST WITHHOLDIN	9,585			
e All other expenses	-43,267,383			
25 Total functional expenses. Add lines 1 through 24e	45,122,339			
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720).				

Part X Balance Sheet

Check if Schedule O contains a response or note to any line in this Part IX

		(A) Beginning of year		(B) End of year
Assets	1 Cash—non-interest-bearing	17,019,949	1	18,539,752
	2 Savings and temporary cash investments		2	
	3 Pledges and grants receivable, net		3	
	4 Accounts receivable, net		4	
	5 Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		5	
	6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B)		6	
	7 Notes and loans receivable, net		7	
	8 Inventories for sale or use		8	
	9 Prepaid expenses and deferred charges	362,240	9	370,782
	10a Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a 1,730		
	b Less: accumulated depreciation	10b 1,730	173	10c 0
	11 Investments—publicly traded securities	1,613,739,751	11	1,648,323,178
	12 Investments—other securities. See Part IV, line 11		12	
	13 Investments—program-related. See Part IV, line 11		13	
	14 Intangible assets		14	
	15 Other assets. See Part IV, line 11	23,363,705	15	19,996,835
16 Total assets. Add lines 1 through 15 (must equal line 33)	1,654,485,818	16	1,687,230,547	
Liabilities	17 Accounts payable and accrued expenses	8,703,984	17	12,929,492
	18 Grants payable		18	
	19 Deferred revenue		19	
	20 Tax-exempt bond liabilities		20	
	21 Escrow or custodial account liability. Complete Part IV of Schedule D		21	
	22 Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		22	
	23 Secured mortgages and notes payable to unrelated third parties		23	
	24 Unsecured notes and loans payable to unrelated third parties		24	
	25 Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D	1,524,756,139	25	1,544,462,525
	26 Total liabilities. Add lines 17 through 25	1,533,460,123	26	1,557,392,017
Net Assets or Fund Balances	Organizations that follow FASB ASC 958, check here <input type="checkbox"/> and complete lines 27, 28, 32, and 33.			
	27 Net assets without donor restrictions		27	
	28 Net assets with donor restrictions		28	
	Organizations that do not follow FASB ASC 958, check here <input checked="" type="checkbox"/> and complete lines 29 through 33.			
	29 Capital stock or trust principal, or current funds	0	29	0
	30 Paid-in or capital surplus, or land, building or equipment fund	108,446,136	30	108,446,136
	31 Retained earnings, endowment, accumulated income, or other funds	12,579,559	31	21,392,394
32 Total net assets or fund balances	121,025,695	32	129,838,530	
33 Total liabilities and net assets/fund balances	1,654,485,818	33	1,687,230,547	

Part XI Reconciliation of Net Assets

Check if Schedule O contains a response or note to any line in this Part XI

1	Total revenue (must equal Part VIII, column (A), line 12)	1	54,247,522
2	Total expenses (must equal Part IX, column (A), line 25)	2	45,122,339
3	Revenue less expenses. Subtract line 2 from line 1	3	9,125,183
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	121,025,695
5	Net unrealized gains (losses) on investments	5	-312,348
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	
9	Other changes in net assets or fund balances (explain in Schedule O)	9	0
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (B))	10	129,838,530

Part XII Financial Statements and Reporting

Check if Schedule O contains a response or note to any line in this Part XII

- 1** Accounting method used to prepare the Form 990: Cash Accrual Other See schedule o
 If the organization changed its method of accounting from a prior year or checked "Other," explain on Schedule O.
- 2a** Were the organization's financial statements compiled or reviewed by an independent accountant?
 If 'Yes,' check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:
 Separate basis Consolidated basis Both consolidated and separate basis
- b** Were the organization's financial statements audited by an independent accountant?
 If 'Yes,' check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:
 Separate basis Consolidated basis Both consolidated and separate basis
- c** If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?
 If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.
- 3a** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?
- b** If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.

	Yes	No
2a		No
2b	Yes	
2c	Yes	
3a		No
3b		

Additional Data

Software ID:

Software Version:

EIN: 45-3635388

Name: GUARANTY ASSOCIATION BENEFITS COMPANY

Form 990 (2021)

Form 990, Part III, Line 4a:

THE ORGANIZATION OPERATES TO PROTECT, IN ACCORDANCE WITH A COURT-APPROVED LIQUIDATION PLAN, INDIVIDUALS RELYING UPON ANNUITIES ISSUED BY INSOLVENT EXECUTIVE LIFE INSURANCE COMPANY OF NEW YORK ("ELNY"), IN FURTHERANCE OF THE COMMON INTERESTS OF THE STATE GUARANTY ASSOCIATIONS AND THEIR MEMBERS. THE ORGANIZATION'S OBLIGATIONS COMMENCED ON AUGUST 8, 2013, WHEN THE ORDER OF LIQUIDATION AGAINST ELNY BECAME EFFECTIVE. THE ORGANIZATION MET ITS OBLIGATIONS IN 2021 BY PROVIDING ANNUITY BENEFIT PAYMENTS IN THE AMOUNTS SET FORTH ABOVE.

SCHEDULE D
(Form 990)

Department of the Treasury
Internal Revenue Service

Supplemental Financial Statements

OMB No. 1545-0047
2021
Open to Public Inspection

▶ Complete if the organization answered "Yes," on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.
▶ Attach to Form 990.
▶ Go to www.irs.gov/Form990 for instructions and the latest information.

Name of the organization
GUARANTY ASSOCIATION BENEFITS COMPANY

Employer identification number
45-3635388

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.
Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

	(a) Donor advised funds	(b) Funds and other accounts
1 Total number at end of year		
2 Aggregate value of contributions to (during year)		
3 Aggregate value of grants from (during year)		
4 Aggregate value at end of year		

5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control? Yes No

6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit? Yes No

Part II Conservation Easements.
Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

1 Purpose(s) of conservation easements held by the organization (check all that apply).

Preservation of land for public use (e.g., recreation or education) Preservation of an historically important land area

Protection of natural habitat Preservation of a certified historic structure

Preservation of open space

2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.

	Held at the End of the Year
a Total number of conservation easements	2a
b Total acreage restricted by conservation easements	2b
c Number of conservation easements on a certified historic structure included in (a)	2c
d Number of conservation easements included in (c) acquired after 7/25/06, and not on a historic structure listed in the National Register	2d

3 Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year ▶ _____

4 Number of states where property subject to conservation easement is located ▶ _____

5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds? Yes No

6 Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ▶ _____

7 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ▶ \$ _____

8 Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)? Yes No

9 In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement, and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements.

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.
Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

1a If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide, in Part XIII, the text of the footnote to its financial statements that describes these items.

b If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items:

(i) Revenue included on Form 990, Part VIII, line 1 ▶ \$ _____

(ii) Assets included in Form 990, Part X ▶ \$ _____

2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under FASB ASC 958 relating to these items:

a Revenue included on Form 990, Part VIII, line 1 ▶ \$ _____

b Assets included in Form 990, Part X ▶ \$ _____

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

- 3 Using the organization's acquisition, accession, and other records, check any of the following that are a significant use of its collection items (check all that apply):
a Public exhibition
b Scholarly research
c Preservation for future generations
d Loan or exchange programs
e Other
4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.
5 During the year, did the organization solicit or receive donations of art, historical treasures or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? Yes No

Part IV Escrow and Custodial Arrangements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

- 1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X? Yes No
b If "Yes," explain the arrangement in Part XIII and complete the following table:
Table with columns: Amount, 1c Beginning balance, 1d Additions during the year, 1e Distributions during the year, 1f Ending balance
2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? Yes No
b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided in Part XIII

Part V Endowment Funds.

Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

Table with 5 columns: (a) Current year, (b) Prior year, (c) Two years back, (d) Three years back, (e) Four years back. Rows include: 1a Beginning of year balance, b Contributions, c Net investment earnings, gains, and losses, d Grants or scholarships, e Other expenditures for facilities and programs, f Administrative expenses, g End of year balance.

- 2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:
a Board designated or quasi-endowment
b Permanent endowment
c Term endowment
The percentages on lines 2a, 2b, and 2c should equal 100%.
3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:
(i) Unrelated organizations
(ii) Related organizations
b If "Yes" on 3a(ii), are the related organizations listed as required on Schedule R?
4 Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI Land, Buildings, and Equipment.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Table with 4 columns: (a) Cost or other basis (investment), (b) Cost or other basis (other), (c) Accumulated depreciation, (d) Book value. Rows include: 1a Land, b Buildings, c Leasehold improvements, d Equipment, e Other, Total. Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10(c).)

Part VII Investments - Other Securities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) Financial derivatives		
(2) Closely-held equity interests		
(3) Other _____		
(A)		
(C)		
(D)		
(E)		
(F)		
(G)		
(H)		
(H)		
Total. (Column (b) must equal Form 990, Part X, col. (B) line 12.)		

Part VIII Investments - Program Related.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
(10)		
Total. (Column (b) must equal Form 990, Part X, col.(B) line 13.)		

Part IX Other Assets.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

(a) Description	(b) Book value
(1)	
(2)	
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
(10)	
Total. (Column (b) must equal Form 990, Part X, col.(B) line 15.)	

Part X Other Liabilities.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Book value
(1) Federal income taxes	
(2) AGGREGATE LIFE RESERVE	1,192,630,457
(3) INTEREST MAINTENANCE RESERVE	351,832,068
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
Total. (Column (b) must equal Form 990, Part X, col.(B) line 25.)	1,544,462,525

2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FIN 48 (ASC 740). Check here if the text of the footnote has been provided in Part XIII

Part XI Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

1	Total revenue, gains, and other support per audited financial statements		1	50,980,055
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			
a	Net unrealized gains (losses) on investments	2a		
b	Donated services and use of facilities	2b		
c	Recoveries of prior year grants	2c		
d	Other (Describe in Part XIII.)	2d		
e	Add lines 2a through 2d		2e	0
3	Subtract line 2e from line 1		3	50,980,055
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	3,267,467	
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b		4c	3,267,467
5	Total revenue. Add lines 3 and 4c . (This must equal Form 990, Part I, line 12.)		5	54,247,522

Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

1	Total expenses and losses per audited financial statements		1	41,854,872
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:			
a	Donated services and use of facilities	2a		
b	Prior year adjustments	2b		
c	Other losses	2c		
d	Other (Describe in Part XIII.)	2d		
e	Add lines 2a through 2d		2e	0
3	Subtract line 2e from line 1		3	41,854,872
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	3,267,467	
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b		4c	3,267,467
5	Total expenses. Add lines 3 and 4c . (This must equal Form 990, Part I, line 18.)		5	45,122,339

Part XIII Supplemental Information

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

Return Reference	Explanation
See Additional Data Table	

Part XIII Supplemental Information (continued)

Return Reference	Explanation

Additional Data

Software ID:

Software Version:

EIN: 45-3635388

Name: GUARANTY ASSOCIATION BENEFITS COMPANY

Supplemental Information

Return Reference	Explanation
PART X, LINE 2:	GABC HAS BEEN CLASSIFIED BY THE INTERNAL REVENUE SERVICE (THE "IRS") AS A NON-PROFIT ORGANIZATION DESCRIBED UNDER SECTION 501(C)(6) OF THE INTERNAL REVENUE CODE, AND THEREFORE IS EXEMPT FROM FEDERAL INCOME TAXES. MANAGEMENT HAS ANALYZED THE TAX POSITIONS TAKEN BY GABC, AND HAS CONCLUDED THAT AS OF DECEMBER 31, 2021 AND 2020, THERE ARE NO UNCERTAIN POSITIONS TAKEN OR EXPECTED TO BE TAKEN THAT WOULD REQUIRE RECOGNITION OF A LIABILITY OR DISCLOSURE IN THE SPECIAL-PURPOSE FINANCIAL STATEMENTS. GABC RECOGNIZES ACCRUED INTEREST AND PENALTIES ASSOCIATED WITH UNCERTAIN TAX POSITIONS, IF ANY AS AN OPERATING EXPENSE. THERE WAS NO INCOME TAX-RELATED INTEREST OR PENALTIES RECORDED FOR THE PERIODS ENDED DECEMBER 31, 2021 AND 2020.

Supplemental Information

Return Reference	Explanation
SCHEDULE D, PART XI, LINE 4B	INVESTMENT MANAGEMENT FEES: \$3,029,693 CUSTODY FEES-US BANK: \$237,774

Supplemental Information

Return Reference	Explanation
SCHEDULE D, PART XII, LINE 4B	INVESTMENT MANAGEMENT FEES: \$3,029,693 CUSTODY FEES-US BANK: \$237,774

Schedule J
(Form 990)

Compensation Information

OMB No. 1545-0047
2021
Open to Public Inspection

For certain Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees
 ▶ Complete if the organization answered "Yes" on Form 990, Part IV, line 23.
 ▶ Attach to Form 990.
 ▶ Go to www.irs.gov/Form990 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Name of the organization
GUARANTY ASSOCIATION BENEFITS COMPANY

Employer identification number
45-3635388

Part I Questions Regarding Compensation

	Yes	No								
<p>1a Check the appropriate box(es) if the organization provided any of the following to or for a person listed on Form 990, Part VII, Section A, line 1a. Complete Part III to provide any relevant information regarding these items.</p> <table border="0"> <tr> <td><input type="checkbox"/> First-class or charter travel</td> <td><input type="checkbox"/> Housing allowance or residence for personal use</td> </tr> <tr> <td><input type="checkbox"/> Travel for companions</td> <td><input type="checkbox"/> Payments for business use of personal residence</td> </tr> <tr> <td><input type="checkbox"/> Tax idemnification and gross-up payments</td> <td><input type="checkbox"/> Health or social club dues or initiation fees</td> </tr> <tr> <td><input type="checkbox"/> Discretionary spending account</td> <td><input type="checkbox"/> Personal services (e.g., maid, chauffeur, chef)</td> </tr> </table>	<input type="checkbox"/> First-class or charter travel	<input type="checkbox"/> Housing allowance or residence for personal use	<input type="checkbox"/> Travel for companions	<input type="checkbox"/> Payments for business use of personal residence	<input type="checkbox"/> Tax idemnification and gross-up payments	<input type="checkbox"/> Health or social club dues or initiation fees	<input type="checkbox"/> Discretionary spending account	<input type="checkbox"/> Personal services (e.g., maid, chauffeur, chef)		
<input type="checkbox"/> First-class or charter travel	<input type="checkbox"/> Housing allowance or residence for personal use									
<input type="checkbox"/> Travel for companions	<input type="checkbox"/> Payments for business use of personal residence									
<input type="checkbox"/> Tax idemnification and gross-up payments	<input type="checkbox"/> Health or social club dues or initiation fees									
<input type="checkbox"/> Discretionary spending account	<input type="checkbox"/> Personal services (e.g., maid, chauffeur, chef)									
<p>b If any of the boxes on Line 1a are checked, did the organization follow a written policy regarding payment or reimbursement or provision of all of the expenses described above? If "No," complete Part III to explain</p>	1b									
<p>2 Did the organization require substantiation prior to reimbursing or allowing expenses incurred by all directors, trustees, officers, including the CEO/Executive Director, regarding the items checked on Line 1a?</p>	2									
<p>3 Indicate which, if any, of the following the filing organization used to establish the compensation of the organization's CEO/Executive Director. Check all that apply. Do not check any boxes for methods used by a related organization to establish compensation of the CEO/Executive Director, but explain in Part III.</p> <table border="0"> <tr> <td><input type="checkbox"/> Compensation committee</td> <td><input type="checkbox"/> Written employment contract</td> </tr> <tr> <td><input type="checkbox"/> Independent compensation consultant</td> <td><input type="checkbox"/> Compensation survey or study</td> </tr> <tr> <td><input type="checkbox"/> Form 990 of other organizations</td> <td><input type="checkbox"/> Approval by the board or compensation committee</td> </tr> </table>	<input type="checkbox"/> Compensation committee	<input type="checkbox"/> Written employment contract	<input type="checkbox"/> Independent compensation consultant	<input type="checkbox"/> Compensation survey or study	<input type="checkbox"/> Form 990 of other organizations	<input type="checkbox"/> Approval by the board or compensation committee				
<input type="checkbox"/> Compensation committee	<input type="checkbox"/> Written employment contract									
<input type="checkbox"/> Independent compensation consultant	<input type="checkbox"/> Compensation survey or study									
<input type="checkbox"/> Form 990 of other organizations	<input type="checkbox"/> Approval by the board or compensation committee									
<p>4 During the year, did any person listed on Form 990, Part VII, Section A, line 1a, with respect to the filing organization or a related organization:</p> <p>a Receive a severance payment or change-of-control payment?</p> <p>b Participate in, or receive payment from, a supplemental nonqualified retirement plan?</p> <p>c Participate in, or receive payment from, an equity-based compensation arrangement?</p> <p>If "Yes" to any of lines 4a-c, list the persons and provide the applicable amounts for each item in Part III.</p>	4a	No								
	4b	No								
	4c	No								
<p>Only 501(c)(3), 501(c)(4), and 501(c)(29) organizations must complete lines 5-9.</p> <p>5 For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the revenues of:</p> <p>a The organization?</p> <p>b Any related organization?</p> <p>If "Yes," on line 5a or 5b, describe in Part III.</p>	5a									
	5b									
<p>6 For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the net earnings of:</p> <p>a The organization?</p> <p>b Any related organization?</p> <p>If "Yes," on line 6a or 6b, describe in Part III.</p>	6a									
	6b									
<p>7 For persons listed on Form 990, Part VII, Section A, line 1a, did the organization provide any nonfixed payments not described in lines 5 and 6? If "Yes," describe in Part III.</p>	7									
<p>8 Were any amounts reported on Form 990, Part VII, paid or accrued pursuant to a contract that was subject to the initial contract exception described in Regulations section 53.4958-4(a)(3)? If "Yes," describe in Part III.</p>	8									
<p>9 If "Yes" on line 8, did the organization also follow the rebuttable presumption procedure described in Regulations section 53.4958-6(c)?</p>	9									

Part II Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees. Use duplicate copies if additional space is needed.

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that are not listed on Form 990, Part VII.

Note. The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

(A) Name and Title		(B) Breakdown of W-2, 1099-MISC compensation, and/or 1099-NEC			(C) Retirement and other deferred compensation	(D) Nontaxable benefits	(E) Total of columns (B)(i)-(D)	(F) Compensation in column (B) reported as deferred on prior Form 990
		(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation				
1 LYNDA G LOOMIS VICE PRESIDENT OPERATIONS	(i)	345,308 -----	0 -----	0 -----	0 -----	0 -----	345,308 -----	0 -----
	(ii)	0	0	0	0	0	0	0
2 PETER G GALLANIS DIRECTOR, PRESIDENT	(i)	85,375 -----	0 -----	0 -----	2,767 -----	2,804 -----	90,946 -----	0 -----
	(ii)	0	0	0	0	0	0	0

Part III Supplemental Information

Provide the information, explanation, or descriptions required for Part I, lines 1a, 1b, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, and 8, and for Part II. Also complete this part for any additional information.

Return Reference	Explanation
PART II, LINE 1	<p>THE ORGANIZATION'S PRESIDENT, WHICH IS ITS TOP MANAGEMENT OFFICIAL, IS NOT COMPENSATED DIRECTLY BY THE ORGANIZATION. THE ORGANIZATION'S PRESIDENT IS ALSO THE PRESIDENT OF THE NATIONAL ORGANIZATION OF LIFE AND HEALTH INSURANCE GUARANTY ASSOCIATIONS ("NOLHGA") WHICH IS AN UNRELATED ENTITY. THE ORGANIZATION HAS ENTERED INTO AN AGREEMENT WITH NOLHGA FOR VARIOUS SERVICES TO BE PROVIDED TO THE ORGANIZATION BY NOLHGA (E.G., PROVIDING IMPORTANT IT SERVICES TO THE ORGANIZATION AND OVERSIGHT AND TRACKING OF THE ORGANIZATION'S ADMINISTRATIVE COSTS AND EXPENSES, ETC.). THE SERVICES PROVIDED TO THE ORGANIZATION UNDER THE AGREEMENT ALSO INCLUDE ADVICE AND LEADERSHIP BY NOLHGA'S PRESIDENT, WHO ALSO SERVES AS PRESIDENT OF THE ORGANIZATION. AN APPROPRIATE PORTION OF THE TIME SPENT ON THE ORGANIZATION'S BEHALF BY NOLHGA'S PRESIDENT IS CHARGED TO THE ORGANIZATION. THUS, THE ORGANIZATION'S PRESIDENT RECEIVES NO ADDITIONAL COMPENSATION FOR SERVING AS THE ORGANIZATION'S PRESIDENT, BUT THE ORGANIZATION REIMBURSES NOLHGA FOR THE PORTION OF TIME NOLHGA'S PRESIDENT DEVOTES TO THE ORGANIZATION. THE TERMS OF THE AGREEMENT WERE NEGOTIATED ON BEHALF OF THE ORGANIZATION BY ITS OUTSIDE COUNSEL, WITH OVERSIGHT BY THE CHAIRMAN OF THE BOARD. ONCE FINAL, THE AGREEMENT WAS PRESENTED TO AND APPROVED BY THE ORGANIZATION'S BOARD.</p>

Schedule L (Form 990) Department of the Treasury Internal Revenue Service

Transactions with Interested Persons

OMB No. 1545-0047 2021 Open to Public Inspection

Complete if the organization answered "Yes" on Form 990, Part IV, lines 25a, 25b, 26, 27, 28a, 28b, or 28c, or Form 990-EZ, Part V, line 38a or 40b. Attach to Form 990 or Form 990-EZ. Go to www.irs.gov/Form990 for instructions and the latest information.

Name of the organization GUARANTY ASSOCIATION BENEFITS COMPANY

Employer identification number 45-3635388

Part I Excess Benefit Transactions (section 501(c)(3), section 501(c)(4), and section 501(c)(29) organizations only). Complete if the organization answered "Yes" on Form 990, Part IV, line 25a or 25b, or Form 990-EZ, Part V, line 40b.

Table with 5 columns: (a) Name of disqualified person, (b) Relationship between disqualified person and organization, (c) Description of transaction, (d) Corrected? (Yes/No)

2 Enter the amount of tax incurred by the organization managers or disqualified persons during the year under section 4958.
3 Enter the amount of tax, if any, on line 2, above, reimbursed by the organization.

Part II Loans to and/or From Interested Persons. Complete if the organization answered "Yes" on Form 990-EZ, Part V, line 38a, or Form 990, Part IV, line 26; or if the organization reported an amount on Form 990, Part X, line 5, 6, or 22

Table with 9 columns: (a) Name of interested person, (b) Relationship with organization, (c) Purpose of loan, (d) Loan to or from the organization (To/From), (e) Original principal amount, (f) Balance due, (g) In default? (Yes/No), (h) Approved by board or committee? (Yes/No), (i) Written agreement? (Yes/No)

Total \$

Part III Grants or Assistance Benefiting Interested Persons. Complete if the organization answered "Yes" on Form 990, Part IV, line 27.

Table with 5 columns: (a) Name of interested person, (b) Relationship between interested person and the organization, (c) Amount of assistance, (d) Type of assistance, (e) Purpose of assistance

Part IV Business Transactions Involving Interested Persons.

Complete if the organization answered "Yes" on Form 990, Part IV, line 28a, 28b, or 28c.

(a) Name of interested person	(b) Relationship between interested person and the organization	(c) Amount of transaction	(d) Description of transaction	(e) Sharing of organization's revenues?	
				Yes	No
(1) LYNDA G LOOMIS	VICE PRESIDENT OPERATIONS	345,308	SEE SUPPLEMENTAL INFORMATION		No
(2) PETER G GALLANIS	DIRECTOR, PRESIDENT	90,946	SEE SUPPLEMENTAL INFORMATION		No

Part V Supplemental Information

Provide additional information for responses to questions on Schedule L (see instructions).

Return Reference	Explanation
SCHEDULE L, PART IV, LINE 1D	THE VICE PRESIDENT OPERATIONS IS A NON-EMPLOYEE OFFICER THAT IS COMPENSATED UNDER A SERVICE CONTRACT. THE ORGANIZATION'S PRESIDENT AND CHAIRMAN OVERSAW THE NEGOTIATION OF THE SERVICE CONTRACT ON BEHALF OF THE ORGANIZATION. BOTH THE PRESIDENT AND THE CHAIRMAN ARE FAMILIAR WITH THE SERVICES THE VICE PRESIDENT OF OPERATIONS IS OBLIGATED TO PROVIDE UNDER THE SERVICE CONTRACT AND THE COST OF SIMILAR SERVICES PROVIDED TO STATE LIFE AND HEALTH INSURANCE GUARANTY ASSOCIATIONS, WHICH ARE SIMILAR TO THE ORGANIZATION.
SCHEDULE L, PART IV, LINE 2D	THE ORGANIZATION'S PRESIDENT, WHICH IS ITS TOP MANAGEMENT OFFICIAL, IS NOT COMPENSATED DIRECTLY BY THE ORGANIZATION. THE ORGANIZATION'S PRESIDENT IS ALSO THE PRESIDENT OF THE NATIONAL ORGANIZATION OF LIFE AND HEALTH INSURANCE GUARANTY ASSOCIATIONS ("NOLHGA"). THE ORGANIZATION HAS ENTERED INTO AN AGREEMENT WITH NOLHGA FOR VARIOUS SERVICES TO BE PROVIDED TO THE ORGANIZATION BY NOLHGA (E.G., PROVIDING IMPORTANT IT SERVICES TO THE ORGANIZATION AND OVERSIGHT AND TRACKING OF THE ORGANIZATION'S ADMINISTRATIVE COSTS AND EXPENSES, ETC.). THE SERVICES PROVIDED TO THE ORGANIZATION UNDER THE AGREEMENT ALSO INCLUDE ADVICE AND LEADERSHIP BY NOLHGA'S PRESIDENT, WHO ALSO SERVES AS PRESIDENT OF THE ORGANIZATION. AN APPROPRIATE PORTION OF THE TIME SPENT ON THE ORGANIZATION'S BEHALF BY NOLHGA'S PRESIDENT IS CHARGED TO THE ORGANIZATION. THUS, THE ORGANIZATION'S PRESIDENT RECEIVES NO ADDITIONAL COMPENSATION FOR SERVING AS THE ORGANIZATION'S PRESIDENT, BUT THE ORGANIZATION REIMBURSES NOLHGA FOR THE PORTION OF TIME NOLHGA'S PRESIDENT DEVOTES TO THE ORGANIZATION. THE TERMS OF THE AGREEMENT WERE NEGOTIATED ON BEHALF OF THE ORGANIZATION BY ITS OUTSIDE COUNSEL, WITH OVERSIGHT BY THE CHAIRMAN OF THE BOARD. ONCE FINAL, THE AGREEMENT WAS PRESENTED TO AND APPROVED BY THE ORGANIZATION'S BOARD.
SCHEDULE L, PART IV, LINE 2D	THE ORGANIZATION OPERATES TO PROTECT, IN ACCORDANCE WITH A COURT-APPROVED LIQUIDATION PLAN, INDIVIDUALS RELYING UPON ANNUITIES ISSUED BY INSOLVENT EXECUTIVE LIFE INSURANCE COMPANY OF NEW YORK ("ELNY"), IN FURTHERANCE OF THE COMMON INTERESTS OF THE STATE GUARANTY ASSOCIATIONS AND THEIR MEMBERS. IN THAT CAPACITY, THE ORGANIZATION IS A PARTY TO VARIOUS AGREEMENTS, INCLUDING AN "AGREEMENT OF RESTRUCTURING" TO WHICH NOLHGA IS A PARTY, AND PETER GALLANIS (THE ORGANIZATION'S PRESIDENT AND A DIRECTOR) IS THE PRESIDENT OF NOLHGA. THE ORGANIZATION IS ALSO A PARTY TO TWO OTHER RELATED AGREEMENTS WITH 39 LIFE INSURANCE COMPANIES, INCLUDING MASS MUTUAL (DIRECTOR JOHN DEITELBAUM IS AN OFFICER), METLIFE (DIRECTOR JAMES DONNELLAN IS AN OFFICER), NEW YORK LIFE (DIRECTOR ERIK ANDERSON IS AN OFFICER) AND PRUDENTIAL (DIRECTOR GERMAINE MARKS IS AN OFFICER). ALL OF THE TRANSACTIONS RELATED TO THE ELNY LIQUIDATION, INCLUDING ALL OF THE FOREGOING, CLOSED AS OF AUGUST 8, 2013, WHEN THE LIQUIDATION ORDER AGAINST ELNY BECAME EFFECTIVE AND THE ORGANIZATION COMMENCED ITS OPERATIONS.

SCHEDULE O
(Form 990)Department of the Treasury
Internal Revenue Service**Supplemental Information to Form 990 or 990-EZ**Complete to provide information for responses to specific questions on
Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

▶ Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2021**Open to Public
Inspection**

Name of the organization

GUARANTY ASSOCIATION BENEFITS COMPANY

Employer identification number

45-3635388

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 6	THE ORGANIZATION IS A NON-STOCK, NON-PROFIT MEMBERSHIP ORGANIZATION ORGANIZED UNDER THE DI STRICT OF COLUMBIA NONPROFIT CORPORATION ACT OF 2010. MEMBERSHIP IS RESTRICTED TO THE STAT E LIFE AND HEALTH INSURANCE GUARANTY ASSOCIATIONS THAT PARTICIPATED IN THE COURT-APPROVED LIQUIDATION PLAN FOR EXECUTIVE LIFE INSURANCE COMPANY OF NEW YORK.

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 7A	THE ORGANIZATION'S MEMBERS ELECT FOUR (4) OF THE ORGANIZATION'S SEVEN (7) BOARD MEMBERS, BUT EACH PERSON ELIGIBLE FOR ELECTION TO THE BOARD BY THE MEMBERS MUST SATISFY THE REQUIREMENTS IN THE ORGANIZATION'S BYLAWS.

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 7B	THE ORGANIZATION'S MEMBERS RETAIN THE RIGHTS TO APPROVE ALL AMENDMENTS TO THE ORGANIZATION'S ARTICLES OF INCORPORATION AND TO AMEND THE ORGANIZATION'S BYLAWS. IN ADDITION, THE ORGANIZATION'S MEMBERS RETAIN THE RIGHTS PROVIDED UNDER THE DISTRICT OF COLUMBIA NONPROFIT CORPORATION ACT OF 2010 TO APPROVE CERTAIN EXTRAORDINARY ACTIONS BY THE ORGANIZATION (E.G. CERTAIN DISPOSITION OF ASSETS, DISSOLUTION OR MERGER OF THE ORGANIZATION).

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	THE ORGANIZATION'S MANAGEMENT WORKED WITH THE ORGANIZATION'S INDEPENDENT AUDIT FIRM TO COMPLETE THE 990. THE ORGANIZATION'S CHAIRMAN CAUSED THE 990 TO BE CIRCULATED ELECTRONICALLY TO ALL BOARD MEMBERS AFTER IT WAS COMPLETED FOR THEIR REVIEW AND COMMENTS. THE TRANSMITTAL ASKED EACH BOARD MEMBER TO NOTIFY THE CHAIRMAN OF ANY QUESTIONS, COMMENTS OR OBSERVATIONS ABOUT THE 990 WITHIN FIVE (5) DAYS, AND ADVISED THE BOARD MEMBERS THAT THE CHAIRMAN WOULD CALL A MEETING OF THE BOARD IF TWO OR MORE BOARD MEMBERS SO REQUESTED. ANY COMMENTS RECEIVED FROM ANY BOARD MEMBER WERE CONSIDERED PRIOR TO FINALIZING THE 990. ANY ADJUSTMENTS DETERMINED BY THE CHAIRMAN AND THE ORGANIZATION'S MANAGEMENT TO BE WARRANTED WERE MADE TO THE FORM 990 BEFORE IT WAS FINALIZED AND FILED WITH THE INTERNAL REVENUE SERVICE.

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 12C	EACH YEAR THE ORGANIZATION'S OUTSIDE COUNSEL PREPARES A "CERTIFICATE OF COMPLIANCE AND CONFLICT OF INTEREST STATEMENT" THAT IS PRESENTED TO EACH DIRECTOR, OFFICER AND KEY PERSONNEL FOR EXECUTION. OUTSIDE COUNSEL EXPLAINS THE REASON FOR THE STATEMENT. OUTSIDE COUNSEL REVIEWS THE STATEMENTS AND EVALUATES ANY ITEMS THAT MAY BE LISTED BY THE INDIVIDUALS TO DETERMINE IF A CONFLICT MIGHT EXIST AND WOULD ADVISE DISINTERESTED OFFICERS OF THE ORGANIZATION IF ANY ACTIONS WOULD BE ADVISABLE. EACH "CERTIFICATE OF COMPLIANCE AND CONFLICT OF INTEREST STATEMENT" ARE MADE PART OF THE ORGANIZATION'S OFFICIAL MINUTE BOOK.

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 15	<p>THE ORGANIZATION'S PRESIDENT, WHICH IS ITS TOP MANAGEMENT OFFICIAL, IS NOT COMPENSATED DIRECTLY BY THE ORGANIZATION. THE ORGANIZATION'S PRESIDENT IS ALSO THE PRESIDENT OF THE NATIONAL ORGANIZATION OF LIFE AND HEALTH INSURANCE GUARANTY ASSOCIATIONS ("NOLHGA"). THE ORGANIZATION HAS ENTERED INTO AN AGREEMENT WITH NOLHGA FOR VARIOUS SERVICES TO BE PROVIDED TO THE ORGANIZATION BY NOLHGA (E.G., PROVIDING IMPORTANT IT SERVICES TO THE ORGANIZATION AND OVERSIGHT AND TRACKING OF THE ORGANIZATION'S ADMINISTRATIVE COSTS AND EXPENSES, ETC.). THE SERVICES PROVIDED TO THE ORGANIZATION UNDER THE AGREEMENT ALSO INCLUDE ADVICE AND LEADERSHIP BY NOLHGA'S PRESIDENT, WHO ALSO SERVES AS PRESIDENT OF THE ORGANIZATION. AN APPROPRIATE PORTION OF THE TIME SPENT ON THE ORGANIZATION'S BEHALF BY NOLHGA'S PRESIDENT IS CHARGED TO THE ORGANIZATION. THUS, THE ORGANIZATION'S PRESIDENT RECEIVES NO ADDITIONAL COMPENSATION FOR SERVING AS THE ORGANIZATION'S PRESIDENT, BUT THE ORGANIZATION REIMBURSES NOLHGA FOR THE PORTION OF TIME NOLHGA'S PRESIDENT DEVOTES TO THE ORGANIZATION. THE TERMS OF THE AGREEMENT WERE NEGOTIATED ON BEHALF OF THE ORGANIZATION BY ITS OUTSIDE COUNSEL, WITH OVERSIGHT BY THE CHAIRMAN OF THE BOARD. ONCE FINAL, THE AGREEMENT WAS PRESENTED TO AND APPROVED BY THE ORGANIZATION'S BOARD. FORM 990, PART VI, SECTION B, LINE 15B: THE ORGANIZATION'S VICE PRESIDENT OPERATIONS IS A NON-EMPLOYEE OFFICER THAT IS COMPENSATED UNDER A SERVICE CONTRACT. THE ORGANIZATION'S PRESIDENT AND CHAIRMAN OVERSAW THE NEGOTIATION OF THE SERVICE CONTRACT ON BEHALF OF THE ORGANIZATION. BOTH THE PRESIDENT AND THE CHAIRMAN ARE FAMILIAR WITH THE SERVICES THE VICE PRESIDENT OF OPERATIONS IS OBLIGATED TO PROVIDE UNDER THE SERVICE CONTRACT AND THE COST OF SIMILAR SERVICES PROVIDED TO STATE LIFE AND HEALTH INSURANCE GUARANTY ASSOCIATIONS.</p>

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION C, LINE 19	WHEN APPROPRIATE, THE ORGANIZATION'S RELEVANT DOCUMENTS WILL BE DELIVERED IN AN AGREED UPON MANNER UPON REQUEST.

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART IX, LINE 24E	RESERVE -16,482,551. CHANGES IN ANNUITY RESERVES -26,784,832.