

# LIFE, ACCIDENT AND HEALTH/FRATERNAL INSURERS

**COMPANY NAME:** \_\_\_\_\_ **NAIC Company Code:** \_\_\_\_\_

**Contact:** \_\_\_\_\_ **Telephone:** \_\_\_\_\_

**REQUIRED FILINGS IN THE STATE OF:** \_\_\_\_\_ **Filings Made During the Year 2024**

**FRATERNAL COMPANIES BEGIN FILING LIFE/FRATERNAL STATEMENT EFFECTIVE WITH FIRST QUARTER, 2019.**

(1) Checklist	(2) Line #	(3) REQUIRED FILINGS FOR THE ABOVE STATE	(4) NUMBER OF COPIES*			(5) DUE DATE	(6) FORM SOURCE**	(7) APPLICABLE NOTES
			Domestic		Foreign			
			State	NAIC	State			
		<b>I. NAIC FINANCIAL STATEMENTS</b>						Please refer to all Notes.
	1	Annual Statement (8 ½"x14")	2	EO	xxx	3/1	NAIC	Postmark date accepted Notes E, F, H, S
	1.1	Printed Investment Schedule detail (Pages E01-E29)	2	EO	xxx	3/1	NAIC	Notes O
	2	Quarterly Financial Statement (8 ½" x 14")	2	EO	xxx	5/15, 8/15, 11/15	NAIC	Postmark date accepted Notes H
	3	Separate Accounts Annual Statement (8 ½"x14")	2	EO	xxx	3/1	NAIC	
		<b>II. NAIC SUPPLEMENTS</b>						Notes E, F, I, M, S
	11	Accident & Health Policy Experience Exhibit	2	EO	xxx	4/1	NAIC	
	12	Credit Insurance Experience Exhibit	2	EO	xxx	4/1	NAIC	
	13	Health Supplement	2	EO	xxx	3/1	NAIC	Notes N
	14	Life, Health & Annuity Guaranty Association Assessable Premium Exhibit, Parts 1 and 2	2	EO	xxx	4/1	NAIC	
	15	Long-term Care Experience Reporting Forms	2	EO	xxx	4/1	NAIC	
	16	Management Discussion & Analysis	2	EO	xxx	4/1	Company	
	17	Market Conduct Annual Statement Premium Exhibit for Year	2	EO	xxx	3/1	NAIC	Notes N
	18	Medicare Supplement Insurance Experience Exhibit	2	EO	xxx	3/1	NAIC	
	19	Medicare Part D Coverage Supplement	2	EO	xxx	3/1, 5/15, 8/15, 11/15	NAIC	
	20	Risk-Based Capital Report	2	EO	xxx	3/1	NAIC	
	21	Schedule SIS	2	N/A	N/A	3/1	NAIC	
	22	Supplemental Compensation Exhibit	2	N/A	N/A	3/1	NAIC	
	23	Supplemental Health Care Exhibit (Parts 1 and 2 )	2	EO	xxx	4/1	NAIC	Notes N
	24	Supplemental Investment Risk Interrogatories	2	EO	xxx	4/1	NAIC	
	25	Supplemental Schedule O	2	EO	xxx	3/1	NAIC	
	26	Supplemental Term and Universal Life Insurance Reinsurance Exhibit	2	EO	xxx	4/1	NAIC	
	27	Trusted Surplus Statement	2	EO	xxx	3/1, 5/15, 8/15, 11/15	NAIC	
	28	Variable Annuities Supplement	2	EO	xxx	4/1	NAIC	
	29	VM 20 Reserves Supplement	2	EO	xxx	3/1	NAIC	
	30	Workers' Compensation Carve-Out Supplement	2	EO	xxx	3/1	NAIC	
		<b>Actuarial Related Items</b>						
	31	Actuarial Certification regarding use 2001 Preferred Class Table	2	EO	xxx	3/1	Company	
	32	Actuarial Certification Related Annuity Nonforfeiture Ongoing Compliance for Equity Indexed Annuities	2	EO	xxx	3/1	Company	
	33	Actuarial Memorandum Related to Universal Life with Secondary Guarantee Policies required by Actuarial Guideline XXXVIII 8D	2	N/A	xxx	4/30	Company	
	34	Actuarial Opinion	2	EO	xxx	3/1	Company	
	35	Actuarial Opinion on Separate Accounts Funding Guaranteed Minimum Benefit	2	EO	xxx	3/1	Company	
	36	Actuarial Opinion on Synthetic Guaranteed Investment Contracts	2	EO	xxx	3/1	Company	
	37	Actuarial Opinion on X-Factors	2	EO	xxx	3/1	Company	
	38	Actuarial Opinion required by Modified Guaranteed Annuity Model Regulation	2	EO	xxx	3/1	Company	

(1) Checklist	(2) Line #	(3) REQUIRED FILINGS FOR THE ABOVE STATE	(4) NUMBER OF COPIES*			(5) DUE DATE	(6) FORM SOURCE**	(7) APPLICABLE NOTES
			Domestic		Foreign			
			State	NAIC	State			
	39	Request for Life PBR Exemption (if applicable)	2	E/O	xxx	Commissioner 7/1 NAIC 8/15	Company	
	40	Executive Summary of the PBR Actuarial Report	2	N/A	xxx	4/1	Company	
	41	Life Summary of the PBR Actuarial Report	2	N/A	xxx	4/1	Company	
	42	Variable Annuities Summary of the PBR Actuarial Report	2	N/A	xxx	4/1	Company	
	43	PBR Actuarial Report (provide upon request)	2	N/A	xxx	As Required	Company	
	44	RAAIS required by <i>Valuation Manual</i>	2	N/A	xxx	4/1	Company	
	45	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXV	2	EO	xxx	3/1,5/15, 8/15, 11/15	Company	
	46	Reasonableness of Assumptions Certification required by Actuarial Guideline XXXV	2	EO	xxx	3/1,5/15, 8/15, 11/15	Company	
	47	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Average Market Value)	2	EO	xxx	3/1,5/15, 8/15, 11/15	Company	
	48	Reasonableness & Consistency of Assumptions Certification required by Actuarial Guideline XXXVI (Updated Market Value)	2	EO	xxx	3/1,5/15, 8/15, 11/15	Company	
	49	Reasonableness of Assumptions Certification for Implied Guaranteed Rate Method required by Actuarial Guideline XXXVI	2	EO	xxx	3/1,5/15, 8/15, 11/15	Company	
	50	RBC Certification required under C-3 Phase I	2	EO	xxx	3/1	Company	
	51	RBC Certification required under C-3 Phase II	2	EO	xxx	3/1	Company	
	52	Statement on non-guaranteed elements - Exhibit 5 Int. #3	2	EO	xxx	3/1	Company	
	53	Statement on par/non-par policies – Exhibit 5 Int. 1&2	2	EO	xxx	3/1	Company	
		<b>III. ELECTRONIC FILING REQUIREMENTS</b>						
								Notes F, M, P
	61	Annual Statement Electronic Filing	xxx	EO	xxx	3/1	NAIC	
	62	March .PDF Filing	xxx	EO	xxx	3/1	NAIC	
	63	Risk-Based Capital Electronic Filing	xxx	EO	N/A	3/1	NAIC	
	64	Risk-Based Capital .PDF Filing	xxx	EO	N/A	3/1	NAIC	
	65	Separate Accounts Electronic Filing	xxx	EO	xxx	3/1	NAIC	
	66	Separate Accounts .PDF Filing	xxx	EO	xxx	3/1	NAIC	
	67	Supplemental Electronic Filing	xxx	EO	xxx	4/1	NAIC	
	68	Supplemental .PDF Filing	xxx	EO	xxx	4/1	NAIC	
	69	Quarterly Statement Electronic Filing	xxx	EO	xxx	5/15, 8/15, 11/15	NAIC	
	70	Quarterly .PDF Filing	xxx	EO	xxx	5/15, 8/15, 11/15	NAIC	
	71	June .PDF Filing	xxx	EO	xxx	6/1	NAIC	
		<b>IV. AUDIT/INTERNAL CONTROL RELATED REPORTS</b>						
								Notes E, F S, T
	81	Accountants Letter of Qualifications	2	EO	N/A	6/1	Company	
	82	Audited Financial Reports	2	EO	xxx	6/1	Company	
	83	Audited Financial Reports Exemption Affidavit	2	N/A	N/A	As Required	Company	
	84	Communication of Internal Control Related Matters Noted in Audit	2	EO	N/A	8/1	Company	
	85	Independent CPA (change)	2	N/A	N/A	As Required	Company	
	86	Management's Report of Internal Control Over Financial Reporting	2	N/A	N/A	8/1	Company	
	87	Notification of Adverse Financial Condition	2	N/A	N/A	As Required	Company	
	88	Relief from the five-year rotation requirement for lead audit partner	2	EO	N/A	3/1	Company	
	89	Relief from the one-year cooling off period for independent CPA	2	EO	N/A	3/1	Company	
	90	Relief from the Requirements for Audit Committees	2	EO	N/A	3/1	Company	
	91	Request for Exemption to File Management's Report of Internal Control Over Financial Reporting	2	N/A	N/A	As Required	Company	
		<b>V. STATE REQUIRED FILINGS</b>						
	101	Premium Tax Return and Payments	1	xxx	1	3/1, 6/1	DISB	Postmark date accepted Notes D, E
	102	State Filing Fees (License Renewal)	1	xxx	1	4/30	DISB	Notes C, E
	103	Signed Jurat Page	2	xxx	xxx	Various Dates	NAIC	Notes H

(1) Checklist	(2) Line #	(3) REQUIRED FILINGS FOR THE ABOVE STATE	(4) NUMBER OF COPIES*			(5) DUE DATE	(6) FORM SOURCE**	(7) APPLICABLE NOTES
			Domestic		Foreign			
			State	NAIC	State			
	104	Electronic Claims Payment Form (Prompt pay form)	1	xxx	1	3/15	DISB	Notes Q
	105	Holding Company System Annual Registration Statement (Form B)	1	xxx	N/A	4/30	Company	Notes F, U
	106	Holding Company System Summary of Changes to Registration Statement (Form C)	1	xxx	N/A	4/30	Company	Notes F, U
	107	Holding Company System Prior Notice of a Material Transaction (Form D)	1	xxx	N/A	As Required	Company	Notes U
	108	Holding Company System Pre-Acquisition Notification Form (Form E)	1	xxx	xxx	As Required	Company	Notes U
	109	Holding Company System Enterprise Risk Report (Form F)****	1	xxx	xxx	7/1	Company	Notes U
	110	Regulatory Asset Adequacy Issues Summary	1	N/A	N/A	3/15	Company	Notes V
	111	Actuary Illustration Certification	2	xxx	xxx	As Required	Company	Notes W
	112	Stop-Loss Reporting Form	1	xxx	1	4/1		Notes X
	113	Corporate Governance Annual Disclosure***	1	xxx	xxx	6/1	Company	Notes U
	114	ORSA Summary Report*****	1	xxx	xxx	8/1	Company	Notes U
	115	Notification of Address Changes	1	xxx	1	As Required	Company	Notes Y
	116	Biographical Affidavits	1	xxx	N/A	As Required	DISB	Notes Z
	117	Group Capital Calculation (File with lead state only)	xxx	xxx	xxx		Company	Notes N

\*If XXX appears in this column, this state does not require this filing, if hard copy is filed with the state of domicile and if the data is filed electronically with the NAIC. If N/A appears in this column, the filing is required with the domiciliary state. EO (electronic only filing).

\*\*If Form Source is NAIC, the form should be obtained from the appropriate vendor.

\*\*\*For those states that have adopted the NAIC Corporate Governance Annual Disclosure Model Act, an annual disclosure is required of all insurers or insurance groups by June 1. The Corporate Governance Annual Disclosure is a state filing only and should not be submitted by the company to the NAIC. Note however that this filing is intended to be submitted to the lead state if filed at the insurance group level. For more information on lead states, see the following NAIC URL: [http://www.naic.org/public\\_lead\\_state\\_report.htm](http://www.naic.org/public_lead_state_report.htm).

\*\*\*\*For those states that have adopted the NAIC updated Holding Company Model Act, a Form F filing is required annually by holding company groups. Consistent with the Form B filing requirements, the Form F is a state filing only and should not be submitted by the company to the NAIC. Note however that this filing is intended to be submitted to the lead state. For more information on lead states, see the following NAIC URL: [http://www.naic.org/public\\_lead\\_state\\_report.htm](http://www.naic.org/public_lead_state_report.htm)

\*\*\*\*\*For those states that have adopted the NAIC Risk Management and Own Risk and Solvency Assessment Model Act, a summary report is required annually by insurers and insurance groups above a specified premium threshold. The ORSA Summary Report is a state filing only and should not be submitted by the company to the NAIC. Note however that this filing is intended to be submitted to the lead state if filed at the insurance group level. For more information on lead states, see the following NAIC URL: [http://www.naic.org/public\\_lead\\_state\\_report.htm](http://www.naic.org/public_lead_state_report.htm)

		<b>NOTES AND INSTRUCTIONS (A-K APPLY TO ALL FILINGS)</b>	
	A	Required Filings Contact Person:	Samuel Merlo, Financial Examiner and Analyst sam.merlo@dc.gov (e-mail) (202) 442-7833 (telephone) Also, see Notes C and D below for license and premium tax contacts
	B	Mailing Address:	Nathaniel Kevin Brown, Director - Financial Examinations, Insurance Bureau, DC Department of Insurance, Securities and Banking Financial Analysis Division 1050 First Street, NE Suite, 8 <sup>th</sup> Floor Washington, DC 20002
	C	Mailing Address for Filing Fees:	License Renewal for Life - \$200.00 Check should be payable to DC Treasurer PO Box 92180, Washington, DC 20090 Contact Person: Kathy Alexander kathy.alexander@dc.gov – (email) (202) 442-7819 (telephone)
	D	Mailing Address for Premium Tax Payments:	Payment of premium tax payments can be remitted as follows:  Insurance Tax Return due on or before March 1 and Installment Reporting Statement due on or before June 1.  Website address for Optins. <a href="https://login.optins.org/index.html">https://login.optins.org/index.html</a>  <b>Contact Person:</b> Samuel Merlo Financial Examiner and Analyst sam.merlo@dc.gov (email) (202) 442 – 7833 (telephone)
	E	Delivery Instructions:	All <b>annual financial statement</b> filings Must be postmarked no later than March 1 <sup>st</sup> . Other financial filings must be postmarked no later than the indicated due date. <b>License applications and filing fees</b> must be physically received at the address in Note C no later than April 30 <sup>th</sup> . <b>Premium tax</b> returns and payments must be received no later than March 1 <sup>st</sup> and Installment Reporting Statement due on or before June 1.
	F	Late Filings:	The Company will be fined \$100 per day for a late filing. Other actions including license suspension may be taken.
	G	Original Signatures:	Original signatures are required on all filings from domestic companies.
	H	Signature/Notarization/Certification:	The following three Officers, or a person(s) performing similar functions, of DC domiciled insurers are required to certify, on the Jurat Page, Quarterly and Annual Financial Statements filed with Insurance Department, NAIC and other states:  1) Chief Executive Officer 2) Chief Financial Officer 3) Corporate Secretary  • If your organization does not utilize the above titles, please notify the Financial Analysis Division and explain how the positions of the individuals who sign your financial statement perform similar functions to a CEO (President), CFO (Treasurer) or Secretary.

			<ul style="list-style-type: none"> <li>Individuals performing the duties of both CFO and Secretary must sign separately under each title.</li> <li>Appropriate notarization is required.</li> </ul> <p>The name and address of any consulting person or organization who participated in the preparation of the annual statement must be noted on the Jurat Page of the statement.</p>
	I	Amended Filings:	<ul style="list-style-type: none"> <li>Domestic company amended items must be filed within 10 days of an amendment, along with a letter of explanation for each amended item and a statement as to what impact the amendment had on the year-end Risk Based Capital Report. Only the amended pages should be filed.</li> <li>If any amendments are determined by the company to impact the results of the RBC calculation as reported on the Five-Year Historical page of the annual statement, then a revised RBC report must be filed along with an amended 5 Year Historical page with the Department and the NAIC.</li> <li>A new Jurat page completed in all respects, must accompany all amendments. Signature requirements for the original filing noted above in Notes G and H should be followed for any amendment.</li> </ul>
	J	Exceptions from normal filings:	Foreign companies must supply a written copy of any extension received by its state of domicile at least 10 days prior to the filing date. Domestic companies should apply at least 30 days prior to the due date and, for extensions, must submit a written request explaining the reason for the delay and a detailed timeline of any expected component completion dates and contingencies.
	K	Bar Codes (State or NAIC):	Please follow the instructions in the NAIC Annual Statement Instructions.
	L	Signed Jurat:	See Notes G, H, I
	M	NONE Filings:	District of Columbia does not require the filing of a “NONE” page if applicable supplemental interrogatory indicates that the filing is non-applicable.
	N	Filings new, discontinued or modified materially since last year:	<p>Market Conduct Annual Statement Premium Exhibit for Year is a new filing.</p> <p>Health Supplement and Supplement Health Care Exhibit (Parts 1 and 2 and 3) were modified.</p> <p>Group Capital Calculation. Has not been adopted by the District of Columbia. (DISB)</p>
	O	Item 1.1 Investment Schedule Detail:	Domestic Companies are not required to submit an additional copy of the detailed investment schedules if they are already bound in the Annual Statement.
	P	Electronic Filing Requirements:	<p>See general Instructions for Companies to use checklist to follow for specific guidance on electronic filing requirements including the requirements to file certain items in the portable document (PDF Files). Any questions regarding electronic filing should be directed to the NAIC. The NAIC web site is at <a href="http://www.naic.org">http://www.naic.org</a></p> <p>The main phone line is (816) 842-3600.</p> <p>The NAIC help desk line is (816) 783-8500.</p>
	Q	Electronic Claims Payment Report (Prompt Pay Form):	The “Prompt Pay Act 2002” (DC Code 31-3135) which went into effect on July 23, 2002 requires that health insurers file a claim payment report to the Commissioner no later than March 15 <sup>th</sup> of each year. <b>This is an electronic filing.</b> Please refer to the DISB website for the Claims Payment Reform Form. The report should only be filed by companies that write health insurance as Defined in DC Official Code Title 31,

			Chapter 33, 3301.1. A zero report is required from those writing health insurance but having no claims. <b>Contact Person:</b> Rashaunda Benson Rashaunda.benson@dc.gov or at (202) 442-7763.
	R	Standard Report Requirements:	To order NAIC publications, including the Annual Statement Blanks and Instructions and the Accounting Practices and Procedures Manual, call Publications at (816) 783-8300. Publications catalogue also available on-line at <a href="http://www.naic.org">http://www.naic.org</a>
	S	Foreign Company Filings:	Foreign Companies to file hard copy of statements only upon written request.
	T	Audited Statements:	Please refer to DC Code 31, Chapter 3 for guidance. Audited Statement must be prepared on a statutory basis. Auditor must be an independent CPA. CPA appointment or Change Notice – refer to DC Code 31-304.
	U	Annual & Other Holding Company Requirements:	Foreign Companies domiciled in States that have holding company system filing requirements, similar to the District of Columbia, are not routinely required to file with the DISB. Please refer to DC Code 31, Chapter 31, and Chapter 7 for guidance.
	V	Regulatory Asset Adequacy Issues Summary:	This document is only required for domestic Companies or if requested by regulator.
	W	Actuary Illustration Certification:	The District requires domestic life companies to file the certification. For non-domestic companies, the certification only needs to be filed upon request from the regulator.
	X	Stop-Loss Reporting Form:	Howard M. Liebers, Manager, Insurance Products - Forms & Policy Analysis, Insurance Bureau DC Department of Insurance, Securities, and Banking (DISB) Insurance Bureau 1050 First Street, NE, 8 <sup>th</sup> Floor Washington, DC 20002 <b>Contact person:</b> Howard M. Liebers <a href="mailto:Howard.liebers@dc.gov">Howard.liebers@dc.gov</a> (e-mail) (202) 422-8571 (telephone) The form is at: <a href="https://dcgov.seamlessdocs.com/f/DCStopLossReportingForm">https://dcgov.seamlessdocs.com/f/DCStopLossReportingForm</a>  All Form Submissions will go to <a href="mailto:insurance.bureau@dc.gov">insurance.bureau@dc.gov</a>
	Y	Notification of Address Changes	Whenever a company has a change in Statutory Home Office or Mailing Address, a form must be completed and submitted to enable us to update our records. Please complete the applicable NAIC UCAA Form (2c or 14) <a href="https://content.naic.org/industry/ucaa">https://content.naic.org/industry/ucaa</a> and file electronically through the UCAA system.
	Z	Biographical Affidavits	Bios should not be filed by Foreign/Alien companies who have filed with their state of domicile.  We require all pages of the NAIC biographical affidavit to be completed. Incomplete affidavits will be considered unfiled. All bios should be updated for current officers and directors at the time any of the information changes.  Bios for domestic companies must be filed in the original and kept current for Officers and Directors.  For domestic companies, the Department requires original bios to be filed for all Officers and Directors listed on Jurat page: <ul style="list-style-type: none"> <li>• When a new Officer or Director is named.</li> <li>• When the information of any current officer and/or director changes.</li> </ul>

		Bio Form:	<ul style="list-style-type: none"> <li>When the last bio filed with the Department is five years old.</li> </ul> <a href="https://content.naic.org/sites/default/files/ucaa-industry-naic-biographical-affidavit.pdf">https://content.naic.org/sites/default/files/ucaa-industry-naic-biographical-affidavit.pdf</a>

**General Instructions  
For Companies to Use Checklist**

**Please Note:** This state's instructions for companies to file with the NAIC are included in this Checklist. The NAIC will not be sending their own checklist this year.

**Electronic filing is intended to be filing(s) submitted to the NAIC via the NAIC Internet Filing Site which eliminates the need for a company to submit diskettes or CD-ROM to the NAIC. Companies are not required to file hard copy filings with the NAIC.**

**Column (1) Checklist**

Companies may use the checklist to submit to a state, if the state requests it. Companies should copy the checklist and place an "x" in this column when submitting information to the state.

**Column (2) Line #**

Line # refers to a standard filing number used for easy reference. This line number may change from year to year.

**Column (3) Required Filings**

Name of item or form to be filed.

The ***Annual Statement Electronic Filing*** includes the annual statement data and all supplements due March 1, per the *Annual Statement Instructions*. This includes all detail investment schedules and other supplements for which the *Annual Statement Instructions* exempt printed detail.

The ***March.PDF Filing*** is the .pdf file for annual statement data, detail for investment schedules and supplements due March 1.

The ***Risk-Based Capital Electronic Filing*** includes all risk-based capital data.

The ***Risk-Based Capital.PDF Filing*** is the .pdf file for risk-based capital data.

The ***Separate Accounts Electronic Filing*** includes the separate accounts annual statement and investment schedule detail.

The ***Separate Accounts.PDF Filing*** is the .pdf file for the separate accounts annual statement and all investment schedule detail.

The ***Supplemental Electronic Filing*** includes all supplements due April 1, per the *Annual Statement Instructions*.

The ***Supplement.PDF Filing*** is the .pdf file for all supplemental schedules and exhibits due April 1.

The ***Quarterly Electronic Filing*** includes the quarterly statement data.

The ***Quarterly.PDF Filing*** is the .pdf for quarterly statement data.

The ***June.PDF Filing*** is the .pdf file for the Audited Financial Statements and Accountants Letter of Qualifications.

**Column (4) Number of Copies**

Indicates the number of copies that each foreign or domestic company is required to file for each type of form. The Blanks (EX) Task Force modified the 1999 *Annual Statement Instructions* to waive paper filings of certain NAIC supplements and certain investment schedule detail, if such investment schedule data is available to the states via the NAIC database. The checklists reflect this action taken by the Blanks (EX) Task Force. XXX appears in the "Number of Copies" "Foreign" column for the appropriate schedules and exhibits. **Some states have chosen to waive printed quarterly and annual statements from their foreign insurers and to rely upon the NAIC database for these filings. This waiver could include supplemental annual statement filings. The XXX in this column might signify that the state has waived the paper filing of the annual statement and all supplements.**



**Column (5) Due Date**

Indicates the date on which the company must file the form.

**Column (6) Form Source**

This column contains one of three words: “NAIC,” “State,” or “Company.” If this column contains “NAIC,” the company must obtain the forms from the appropriate vendor. If this column contains “State,” the state will provide the forms with the filing instructions. If this column contains “Company,” the company, or its representative (e.g., its CPA firm), is expected to provide the form based upon the appropriate state instructions or the NAIC *Annual Statement Instructions*.

**Column (7) Applicable Notes**

This column contains references to the Notes to the Instructions that apply to each item listed on the checklist. The company should carefully read these notes before submitting a filing.

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