

EXAMINATION REPORT OF
PRINCIPAL NATIONAL LIFE INSURANCE COMPANY
DES MOINES, IOWA
AS OF DECEMBER 31, 2022

HONORABLE DOUG OMMEN
Commissioner of Insurance
State of Iowa
Des Moines, Iowa

Commissioner:

In accordance with your authorization and pursuant to Iowa statutory provisions, an examination has been made of the records, business affairs and financial condition of

PRINCIPAL NATIONAL LIFE INSURANCE COMPANY

DES MOINES, IOWA

AS OF DECEMBER 31, 2022

at its home office located at 711 High Street, Des Moines, Iowa.

INTRODUCTION

Principal National Life Insurance Company, hereinafter referred to as the “Company”, was last examined as of December 31, 2017, by the Iowa Insurance Division. The examination reported herein was conducted as an examination of an insurance holding company group by the contracting firms, Risk & Regulatory Consulting, LLC, Insurance Strategies Consulting, and examiners of the Iowa Insurance Division. The Company’s affiliate, Principal Life Insurance Company (PLIC), was also examined as part of the holding company group, with a separate examination report prepared for each entity.

SCOPE OF EXAMINATION

This is the regular comprehensive financial examination of the Company covering the intervening period from January 1, 2018 to the close of business on December 31, 2022, including any material transactions and/or events occurring and noted subsequent to the examination period.

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

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

This examination report includes significant findings of fact and general information about the insurer and its financial condition.

HISTORY

The Company was incorporated in the State of Ohio on November 6, 1967, and commenced business on March 1, 1968 as Progressive National Life Insurance Company.

The Company changed its name in 1971 to Progressive American Life Insurance Company.

During 1991, ownership of the Company was transferred from Progressive Casualty Insurance Company of Beachwood, Ohio, to The Progressive Corporation.

In October 2003, Principal Financial Services, Inc. purchased Progressive American Life Insurance Company, an Ohio domiciled shell insurance company. Subsequent to the acquisition, Progressive American was renamed Principal Health Insurance Company and redomiciled to the State of Iowa.

Effective October 16, 2007, Principal Health Insurance Company was renamed Principal National Life Insurance Company.

CAPITAL STOCK AND DIVIDENDS TO STOCKHOLDERS

The Company has authorized 5,000,000 shares of common stock, valued at \$1 par value. As of December 31, 2022, 2,500,000 shares were issued and outstanding, resulting in reporting common capital stock of \$2,500,000, and the Company reported gross paid in and contributed surplus of \$122,936,714.

The Company did not pay any dividends during the examination period, but the Company did report an extraordinary distribution of \$179,844,312 of cash and invested assets as a return of capital during 2022. The extraordinary distribution was approved by the Iowa Insurance Division.

MANAGEMENT AND CONTROL

SHAREHOLDERS

The annual meeting of the shareholders for the election of directors and for the transaction of such other business as may properly come before the meeting, shall be held on the third Monday in May of each year at such place and time as the Board of Directors shall each year fix, or at such other place, time and date as the Board of Directors shall fix.

Special meetings of the shareholders may be called by the Chairman of the Board, the Chief Executive Officer or the Board of Directors, and shall be called by the Board of Directors upon the written demand, signed, dated and delivered to the Secretary, of the holders of at least ten percent of all the votes entitled to be cast on any issue proposed to be considered at the meeting.

Notice of the place, date, and time of all meetings of the shareholders and, in the case of a special meeting, the purpose or purposes for which the meeting is called, shall be communicated not fewer than ten days nor more than 60 days before the date of the meeting to each shareholder entitled to vote at such meeting.

BOARD OF DIRECTORS

The business and affairs of the Company shall be managed under the direction of the Board of Directors. The directors shall be elected at the annual meeting and the number to be elected, shall be fixed at five (5) and shall be determined by the shareholder or a majority of the entire Board of Directors. Each director shall serve a term of approximately three (3) years.

Regular meetings of the Board of Directors shall be held without notice once in each calendar quarter on such date and at such hour and place, within or without the State of Iowa, as may be fixed by the Board of Directors, except that the meeting in the second quarter shall be held in the principal office of the Company in Des Moines on the date of the annual meeting of the shareholders of the Company.

Special meetings of the Board of Directors may be called at any time upon two days' written notice given by the Chairman of the Board, if any, the President or a majority of directors then in office, which notice shall state the date, time and place of the special meeting.

A quorum of the Board of Directors consists of a majority of the number of directors prescribed in accordance with the By-Laws. At all meetings of directors where a quorum is present, the act of the majority of the directors present at the meeting shall be the act of the Board of Directors.

The Board of Directors duly elected and serving as of December 31, 2022 were as follows:

<u>Name and Address</u>	<u>Principal Business Affiliation</u>	<u>Term Expires</u>
Deanna D. Strable-Soethout Urbandale, IA	Executive Vice President, Chief Financial Officer Principal Financial Group, Inc.	2023
Amy C. Friedrich West Des Moines, IA	President – U.S. Insurance Solutions Principal Financial Group, Inc.	2024
Srinivas D. Reddy Clive, IA	Senior Vice President, Retirement and Income Solutions Principal Financial Group, Inc.	2024
Nathan P. Schelhaas Urbandale, IA	Senior Vice President, Head of Life Protection Solutions Principal Financial Group, Inc.	2025
Kenneth A. McCullum West Des Moines, IA	Senior Vice President, Chief Risk Officer Principal Financial Group, Inc.	2025

COMMITTEES

The Board of Directors shall appoint an Executive Committee to serve at the pleasure of the Board of Directors. The Chairman of the Board and the Chief Executive Officer, if different than the Chairman of the Board, shall serve as members. A majority of the members of the Executive Committee shall constitute a quorum. The Executive Committee shall have and may exercise all of the powers of the Board of Directors in the management and affairs of the Company except when the Board of Directors is in session.

The Board of Directors may also establish one or more other committees of the Board of Directors, each committee to consist of two (2) or more directors appointed by the Board of Directors. Any such committee shall serve at the pleasure of the Board of Directors.

The governance and oversight functions of Principal Financial Group, Inc. and Principal Life Insurance Company board committees are also provided to the Company through the following committees. Appointments to the Principal Financial Group, Inc. and Principal Life Insurance Company board committees as of December 31, 2022:

Audit Committee

Diane C. Nordin, Chairperson
Mary E. Beams
Scott M. Mills
H. Elizabeth Mitchell
Clare S. Richer
Alfredo Rivera

Human Resources Committee

Jocelyn Carter-Miller, Chairperson
Michael T. Dan
Scott M. Mills
Claudio N. Muruzabal
Alfredo Rivera

Finance Committee

Clare S. Richer, Chairperson
Jonathan S. Auerbach
Mary E. Beams
Roger C. Hochschild
H. Elizabeth Mitchell
Diane C. Nordin
Blair C. Pickerell

Nominating & Governance Committee

Roger C. Hochschild, Chairperson
Jonathan S. Auerbach
Jocelyn Carter-Miller
Michael T. Dan
Claudio N. Muruzabal
Blair C. Pickerell

Executive Committee

Daniel J. Houston, Chairperson
Jocelyn Carter-Miller
Scott M. Mills
Clare S. Richer

OFFICERS

The Bylaws provide that the Board of Directors shall elect a President of the Company to serve at the pleasure of the Board of Directors. The Board of Directors shall empower either the Chairman of the Board, if one is elected, or the President to serve as the Chief Executive Officer of the Company. The Board of Directors shall appoint a Secretary to serve at the pleasure of the Board of Directors. At any meeting of the Board of Directors, the Board of Directors may elect such other officers of the Company as the Board of Directors may deem necessary, to serve at the pleasure of the Board of Directors. The Board of Directors may authorize the Company to elect or appoint other officers, each of whom shall serve at the pleasure of the Company.

The officers duly elected and serving as of December 31, 2022:

<u>Name</u>	<u>Title</u>
Nathan P. Schelhaas	President
Janis J. Winterhof	Secretary
Gina L. Graham	Vice President and Treasurer
Dwight N. Soethout	Vice President and Chief Actuary
Amy C. Friedrich	President, U.S. Insurance Solutions
Kenneth A. McCullum	Senior Vice President and Chief Risk Officer
Patrick G. Halter	President, Principal Global Asset Management
Joel M. Pitz	Senior Vice President and Controller
Natalie Lamarque	Executive Vice President and General Counsel
Deanna D. Strable-Soethout	Executive Vice President and Chief Financial Officer

The total compensation paid during 2022 to the officers serving as of December 31, 2022, is shown in Exhibit A to be found immediately following the signature page of this report.

CONFLICT OF INTEREST

The Company maintains a formal conflict of interest policy statement and has established for procedures for the Board of Directors or committee thereof to receive information on the annual conflict of interest disclosure procedures of any material interest or affiliation on behalf of the Company's directors officers, and key employees, which is in conflict with their official duties. The examination team reviewed the conflict-of-interest questionnaires completed by the Company's directors and officers for each year of the period covered by this examination.

CORPORATE RECORDS

There were no amendments to the Company's Articles of Incorporation or Bylaws during the examination period.

The minutes from the meetings of the Shareholder, the Board of Directors, and the committees of the board were reviewed for the examination period. All minutes provided were signed and properly attested.

The minutes of the board meetings show that the Report of Examination as of December 31, 2017 by the Iowa Insurance Division was received through the Annual Regulated Activities Report presented to the Audit Committee and the Board of Directors on August 19, 2019.

FIDELITY BONDS AND OTHER INSURANCE

The Company is protected by a financial institution bond with computer crime endorsement up to a single loss limit of \$50,000,000, and an aggregate loss limit of \$100,000,000, with a \$1,000,000 deductible. The insurance coverage meets the NAIC's suggested minimum amount of coverage. The financial institution bond policy as well as other insurance policies under the Principal Financial Group, Inc. insurance program provide adequate coverages and are all with authorized insurers.

RELATED PARTY AGREEMENTS

Administrative Services

The Company entered into an agreement with PLIC, whereby PLIC will provide certain administrative services to the Company necessary for the conduct of its business.

The Company and PLIC entered into an Expense Reimbursement Agreement with Principal Securities, Inc., whereby Principal Securities, Inc. will receive limited reimbursement for expenses associated with the sale of the insurers' products.

The Company entered into an agreement with Principal Securities, Inc., whereby the Company has designated Principal Securities, Inc. as the principal underwriter of its variable life insurance policies with Principal Securities, Inc. serving as distributor.

The Company and PLIC entered into a Cost Allocation Agreement with Principal Financial Group, Inc., whereby the Company and PLIC agreed to an allocation of cost and expense amounts for Principal Financial Group, Inc.'s sponsorship of certain plans that provide benefits to employees of Principal Financial Group, Inc subsidiaries, and, in certain instances, individual field agents.

The Company entered into an Intercompany Trademark Agreement with Principal Financial Services, Inc., whereby the Company wishes to use Principal Financial Services, Inc. trademarks and service marks.

The Company entered into a Personnel Utilization and Administrative Services Agreement with Principal Workforce, LLC, pursuant to which the Company shall reimburse PLIC for the compensation, benefits, and other expenses subject to the terms of the agreement.

The Company entered into an agreement with Principal Securities, Inc., whereby the Company has designated Principal Securities, Inc. as the principal underwriter of its variable life insurance and variable annuity contracts. The Company will pay to Principal Securities, Inc. an amount equal to the expenses incurred by Principal Securities, Inc. in performing the agreement. The Company assumes the costs of all administrative and legal functions pertaining to the policies and contracts.

Cash Management Agreements

The Company and its affiliates entered into an agreement with Principal Financial Services, Inc., to implement a cash management program whereby available short-term investment monies are pooled. Each party to the agreement may either advance or receive funds from the other party. All advances are evidenced by an interest-bearing master note. The amounts advanced are payable upon demand or upon termination of the agreement. Interest is payable on or before the 10th day of each month, so long as an advance is outstanding, with no provision for accrual or deferral of interest.

Federal Income Tax Allocation

The Company and its affiliates entered into a Consolidated Federal Income Tax Allocation Agreement with Principal Financial Group, Inc., whereby Principal Financial Group and its subsidiary companies that are eligible for inclusion agree to file a consolidated federal income tax return pursuant to federal income tax law. This agreement provides for a method of allocation among parties to the agreement based on a pro rata contribution of taxable income or operating losses.

Investment Management

The Company entered into an Investment Management Agreement with Principal Global Investors, LLC, whereby Principal Global Investors, LLC will provide certain investment advisory and management services to the Company.

EMPLOYEES' AND AGENTS' WELFARE

The Company does not have any direct employees. All of the Company's employees and personnel resources are provided through Principal Workforce, LLC.

Principal Financial Group, Inc. offers employee benefits to all eligible employees. Such benefits include access to retirement benefits, group life insurance, supplemental term life insurance, accidental death and dismemberment insurance, business travel accident insurance, comprehensive medical coverage, dental coverage, vision coverage, short-term disability coverage, long-term disability insurance, educational assistance, an adoption expense reimbursement program, flexible reimbursement accounts, severance pay, personal time-off and flex time-off, a stock purchase plan for its employees who qualify, and other forms of compensation.

Principal Financial Group, Inc. sponsors 401(k) select savings and select savings excess plans with matching contributions for all eligible employees.

Principal Financial Group, Inc. also sponsors a defined benefit pension. The Principal Pension Plan (the Plan) is a non-contributory defined benefit plan that covers substantially all home office employees (other than certain specified investment professionals), field managers, and agents holding a Career Agent Contract from Principal Financial Group, Inc. or its adopting affiliates. The Plan provides for retirement and death benefits. While virtually all employees continue to have access to the post-retirement retirement and death benefits, only those that were hired prior to January 1, 2002, and retired prior to January 1, 2011, (post-65 medical) or January 1, 2022, (life insurance and pre-65 medical) were eligible to receive subsidized benefits. All others pay the full cost of coverage. The long-term care plan was subsidized only for those who retired prior to January 1, 2000, and is no longer accessible. The subsidy level for all benefits varies by plan, age, service, and retirement date.

REINSURANCE

Certain reinsurance contracts of the Company were reviewed, and no contract provisions were found to be outside the custom of the industry. All contracts reviewed acceptable insolvency clauses and transfer of risk.

Assumed

During 2006, the Company began assuming reinsurance from PLIC. As of December 31, 2022, the Company had assumed 53 policies at 50 percent net amount at risk, with reserves totaling \$18,209.

Ceded

During 2009, the Company began ceding direct business to PLIC on a coinsurance basis for all non-variable life policies. In 2011, the Company entered into a modified coinsurance agreement for all variable life policies. As of December 31, 2022, the reserve credit taken was \$9,406.2 million and the modified coinsurance reserve was \$671.7 million.

STATUTORY DEPOSIT

The book/adjusted carrying value of securities held in a custodial account and vested in the Iowa Commissioner of Insurance for the benefit of all policyholders as of December 31, 2022, totaled \$5,035,470, which met the minimum statutory requirement.

TERRITORY AND PLAN OF OPERATION

The Company is licensed to transact the business of insurance in the District of Columbia and all fifty states except New York. During the examination period, the Company offered traditional term, universal life, variable universal life and indexed universal life insurance products. Products and services were provided through a variety of distribution channels including affiliated financial representatives, non-affiliated brokers, independent advisors, and agents. June 28, 2021, insurers within the Principal Financial Group, Inc. announced they would discontinue new sales of U.S. retail fixed annuities and consumer life-insurance products.

GROWTH OF COMPANY

The financial information was obtained from the Annual Statements filed with the Iowa Insurance Division during the examination period.

<u>Year</u>	<u>Admitted Assets</u>	<u>Separate Accounts Assets</u>	<u>Liabilities</u>	<u>Separate Accounts Liabilities</u>	<u>Capital & Surplus</u>
2018	\$214,824,534	\$172,374,277	\$9,641,258	\$172,374,277	\$205,183,276
2019	235,981,469	240,424,971	15,111,906	240,424,971	220,869,563
2020	269,487,200	352,525,178	18,823,124	352,525,178	250,664,076
2021	286,649,531	545,749,248	17,147,272	545,749,248	269,502,259
2022	91,975,626	630,536,016	14,202,473	630,536,016	77,773,153

<u>Year</u>	<u>Aggregate Life Reserves</u>	<u>Aggregate A&H Reserves</u>	<u>Deposit-type Contract Funds</u>	<u>Premium and Annuity Considerations</u>	<u>Life Insurance Inforce</u>
2018	\$14,441	\$0	\$0	\$7,200	\$245,168,043,000
2019	15,749	0	0	8,055	283,163,171,000
2020	17,076	0	0	8,503	330,490,478,000
2021	17,757	0	0	8,657	366,977,007,000
2022	18,209	0	0	8,730	373,834,837,000

ACCOUNTS AND RECORDS

Trial balances were prepared for all years of the examination period. Amounts from the general ledger accounts were reconciled and found to be in agreement with balances reported on the filed annual statements for assets, liabilities, income or disbursements.

During the course of the examination, no material aggregate surplus difference was identified from the amount reflected in the financial statements, as presented in the annual statement of December 31, 2022.

SUBSEQUENT EVENTS

No subsequent events were noted during the examination.

FINANCIAL STATEMENTS
AND COMMENTS THEREON

NOTE: The following financial statements are based on the statutory financial statements filed by the Company with the Iowa Insurance Division and present the financial condition of the Company for the period ending December 31, 2022.

STATEMENT OF ASSETS AND LIABILITIES

ASSETS

	<u>Ledger</u>	Not <u>Admitted</u>	<u>Admitted</u>
Bonds	\$ 70,727,433	\$ -	\$ 70,727,433
Cash and short-term investments	904,370	-	904,370
Receivable for securities	82,645	-	82,645
Investment income due and accrued	635,250	-	635,250
Reinsurance:			
Other amounts receivable	8,616,514	-	8,616,514
Net deferred tax asset	55,493,491	45,118,946	10,374,545
Guaranty funds receivable	374,188	-	374,188
Receivable from parent, subsidiaries, affiliates	99,439	-	99,439
Health care and other amounts receivable	116,216	116,216	-
Aggregate write-ins for other-than-invested assets:			
Miscellaneous accounts receivable	<u>161,240</u>	<u>-</u>	<u>161,240</u>
Total assets excluding separate accounts	\$137,210,788	\$45,235,162	\$91,975,626
Total assets from separate accounts	<u>\$630,536,016</u>	<u>\$ -</u>	<u>\$630,536,016</u>
Total assets	<u>\$767,746,804</u>	<u>\$45,235,162</u>	<u>\$ 722,511,642</u>

LIABILITIES, SURPLUS AND OTHER FUNDS

Aggregate reserve for life contracts	\$ 18,209
Contract liabilities not included elsewhere:	
Interest maintenance reserve	873,495
Transfers to separate accounts due to accrued allowances recognized in reserves, net of reinsured allowances	(1,526,734)
Taxes, licenses, and fees due or accrued, excluding federal income taxes	3,391,499
Current federal and foreign income taxes	2,630,757
Amounts withheld or retained by reporting entity as agent or trustee	1,591
Remittances and items not allocated	1,127,163
Miscellaneous liabilities:	
Asset valuation reserve	670,572
Payable to parent, subsidiaries and affiliates	6,734,697
Aggregate write-ins for liabilities	<u>281,224</u>
 Total liabilities excluding separate accounts	 \$ 14,202,473
 Total liabilities from separate accounts statement	 <u>\$630,536,016</u>
 Total liabilities	 <u>\$644,738,489</u>
 Common capital stock	 2,500,000
Gross pain-in and contributed surplus	122,936,714
Unassigned funds (surplus)	<u>(47,663,561)</u>
 Total surplus	 \$ 75,273,153
 Total capital and surplus	 <u>\$ 77,773,153</u>
 Total liabilities and surplus	 <u>\$722,511,642</u>

SUMMARY OF OPERATIONS

Premiums and annuity considerations for life and accident and health contracts	\$ 8,730
Net investment income	2,391,782
Amortization of interest maintenance reserve	255,056
Commissions and expense allowances on reinsurance ceded	240,294,727
Reserve adjustments on reinsurance ceded	187,151,444
Miscellaneous income:	
Income from fees associated with investment management, administration and contract guarantees from separate accounts	24,698,892
Aggregate write-ins from miscellaneous income	<u>1,131,418</u>
Total	\$455,932,050
Increase in aggregate reserves for life and accident and health contracts	<u>\$ 452</u>
Total	\$ 452
Commissions on premiums, annuity considerations, and deposit-type contract funds	\$ 54,349,029
General insurance expenses and fraternal expenses	163,741,376
Insurance taxes, licenses, and fees, excluding federal income taxes	29,636,153
Net transfers to or (from) separate accounts net of reinsurance	211,850,336
Aggregate write-ins for deductions	<u>100</u>
Total	<u>\$459,577,446</u>
Net gain from operations before dividends to policyholders, refunds to members and before federal income taxes	\$ (3,645,396)
Dividends to policyholders and refunds to members	<u>-</u>
Net gain from operations after dividends to policyholders, refunds to members and before federal income taxes	\$ (3,645,396)
Federal and foreign income taxes incurred	<u>5,593,736</u>
Net gain from operations after dividends to policyholders, refunds to members and federal income taxes and before realized capital gains or (losses)	\$ (9,239,132)
Net realized capital gains	<u>29,251</u>
Net income (loss)	<u>\$ (9,209,881)</u>

CAPITAL AND SURPLUS ACCOUNT

Capital and surplus, December 31, 2021	\$ 269,502,259
Net income (loss)	\$ (9,209,881)
Change in net deferred income tax	7,168,568
Change in nonadmitted assets	(12,535,161)
Change in asset valuation reserve	679,606
Surplus Adjustment:	
Paid in	\$(177,592,900)
Aggregate write-ins for gains and losses in surplus	<u>(239,338)</u>
Net change in capital and surplus for the year	<u>\$(191,729,106)</u>
Capital and surplus, December 31, 2022	<u>\$ 77,773,153</u>

CASH FLOW STATEMENT

Cash from Operations

Premiums collected net of reinsurance	\$ 8,730	
Net investment income	4,385,481	
Miscellaneous income	<u>25,799,136</u>	
Total		\$ 30,193,346
Benefit and loss related payments	\$(187,151,444)	
Net transfers to separate accounts	211,999,134	
Commissions, expenses paid and aggregate write-ins	5,102,232	
Federal income taxes (paid) recovered	<u>5,746,060</u>	
Total		<u>\$ 35,695,982</u>
Net cash from operations		<u>\$ (5,502,635)</u>

Cash from Investments

Proceeds from investments sold, matured or repaid:		
Bonds	\$ 15,770,153	
Miscellaneous proceeds	<u>5,805</u>	
Total		\$ 15,775,959
Cost of investments acquired (long-term only):		
Bonds	<u>\$ -</u>	
Total		\$ -
Net increase (decrease) in contract loans and premium notes		<u>\$ -</u>
Net cash from investments		<u>\$ 15,775,959</u>

Cash from Financing and Miscellaneous Sources

Cash provided (applied):		
Capital and paid in surplus, less treasury stock	\$ (29,000,000)	
Other cash provided (applied)	<u>(3,119,130)</u>	
Net cash from financing and miscellaneous sources		<u>\$(32,119,130)</u>

RECONCILIATION OF CASH AND SHORT-TERM INVESTMENTS

Net change in cash, cash equivalents and short-term investments		\$(21,845,807)
Cash, cash equivalents and short-term investments:		
Beginning of year		<u>22,750,177</u>
End of period		<u>\$ 904,370</u>

CONCLUSION

The cooperation and assistance extended by the officers and employees of the Company is hereby acknowledged.

In addition to the undersigned, Jan Moenck, CFE, and Rhonda Ball, CFE of Risk & Regulatory Consulting, LLC; Alex Matovu and Randy Guzman; Financial Examiners for the Iowa Insurance Division; Robert Panah, CFE of Assurity Resources, Inc.; and Carl Harris, FSA, MAAA, and actuarial specialists of Insurance Strategies Consulting, Inc. participated in the examination and preparation of this report.

Respectfully submitted,

/s/ Joshua J. Johnson
Joshua J. Johnson, CFE
Examiner in Charge
Risk & Regulatory Consulting, LLC
On behalf of the Iowa Insurance Division

/s/ Amanda Theisen
Amanda Theisen, CFE
Supervisor and Assistant Chief Examiner
Iowa Insurance Division