

SERFF Tracking Number: WKLY-126219399 State: Arkansas
 Filing Company: Union Fidelity Life Insurance Company State Tracking Number: 42854
 Company Tracking Number: UFLIC MS RI AR
 TOI: MS02I Individual Medicare Supplement - Pre- Standardized Sub-TOI: MS02I.000 Medicare Supplement - Pre- Standardized
 Product Name: Union Fidelity Life Insurance Company Medicare Supplement Rate Increase Prestandardized Medicare Supplement Plans
 Project Name/Number: UFLIC MS RI AR/

Filing at a Glance

Company: Union Fidelity Life Insurance Company

Product Name: Union Fidelity Life Insurance SERFF Tr Num: WKLY-126219399 State: ArkansasLH

Company Medicare Supplement Rate Increase

Prestandardized Medicare Supplement Plans

TOI: MS02I Individual Medicare Supplement - Pre-Standardized SERFF Status: Closed State Tr Num: 42854

Sub-TOI: MS02I.000 Medicare Supplement - Pre-Standardized Co Tr Num: UFLIC MS RI AR State Status: Approved-Closed

Filing Type: Rate Co Status: Reviewer(s): Stephanie Fowler
 Author: Courtney Crocker Disposition Date: 08/11/2009
 Date Submitted: 07/07/2009 Disposition Status: Approved-Closed

Implementation Date Requested: 09/01/2009 Implementation Date: 09/01/2009

State Filing Description:

General Information

Project Name: UFLIC MS RI AR

Project Number:

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact: 15%

Filing Status Changed: 08/11/2009

Deemer Date:

Filing Description:

Union Fidelity Life Insurance Company Medicare Supplement Rate Increase Prestandardized Medicare Supplement Plans

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Group Market Size:

Group Market Type:

Explanation for Other Group Market Type:

State Status Changed: 08/11/2009

Corresponding Filing Tracking Number:

SERFF Tracking Number: WKLY-126219399 State: Arkansas
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 Product Name: Union Fidelity Life Insurance Company Medicare Supplement Rate Increase Prestandardized Medicare Supplement Plans
 Project Name/Number: UFLIC MS RI AR/

Form Numbers: 1-8340, 1-8360, 110-370

Rate increase requested: 15.0%

Filing pending in Domicile State of Illinois

Company and Contact

Filing Contact Information

(This filing was made by a third party - WAI01)

Courtney Crocker, Compliance Analyst courtney.crocker@wakelyinc.com
 Wakely and Associates, Inc. (727) 584-8128 [Phone]
 Largo, FL 33773-1502 (727) 584-5613[FAX]

Filing Company Information

Union Fidelity Life Insurance Company CoCode: 62596 State of Domicile: Illinois
 200 North Martingale Road Group Code: 350 Company Type:
 Schaumburg, IL 60173-2096 Group Name: State ID Number:
 (215) 542-4590 ext. [Phone] FEIN Number: 31-0252460

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation: Prestandardized plans \$50.00 per filing
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Union Fidelity Life Insurance Company	\$50.00	07/07/2009	29032502

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Stephanie Fowler	08/11/2009	08/11/2009

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Stephanie Fowler	08/06/2009	08/06/2009	Courtney Crocker	08/11/2009	08/11/2009

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Disposition

Disposition Date: 08/11/2009

Implementation Date: 09/01/2009

Status: Approved-Closed

Comment: The requested rate increase has been approved to be implemented on or after September 1, 2009. This approval is subject to the following:

Increases will not be given more frequently than once in a twelve-month period.

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
Union Fidelity Life Insurance Company	15.000%	15.000%	\$1,297	7	\$8,645	15.000%	15.000%

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Item Type	Item Name	Item Status	Public Access
Supporting Document	Health - Actuarial Justification	Accepted for Informational Purposes	No
Supporting Document	Authorization Letter	Accepted for Informational Purposes	Yes
Rate (revised)	Rate Pages	Approved	Yes
Rate	Actuarial Memorandum		No

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Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 08/06/2009
Submitted Date 08/06/2009
Respond By Date 09/08/2009

Dear Courtney Crocker,

This will acknowledge receipt of the captioned filing.

Please submit the current and proposed monthly rates.

Please feel free to contact me if you have questions.

Sincerely,

Stephanie Fowler

Response Letter

Response Letter Status Submitted to State
Response Letter Date 08/11/2009
Submitted Date 08/11/2009

Dear Stephanie Fowler,

Comments:

Thank you for your continued consideration of this rate increase request.

Response 1

Comments: Attached are the current and proposed rate pages.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

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Rate/Rule Schedule Item Changes

Document Name: Affected Form Numbers: Rate Action: Rate Action Information: Attach Document:

Rate Pages 1-8340, 1-8360, 130-305 Revised Previous State Filing Number 39407
Percent Rate Change Request 15

Previous Version

Actuarial 1-8340, 1-8360, 110-370 Revised Previous State Filing Number 39407
Memorandum Percent Rate Change Request 15

Sincerely,

Courtney Crocker

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Rate Information

Rate data applies to filing.

Filing Method: SERFF
Rate Change Type: Increase
Overall Percentage of Last Rate Revision: 10.000%
Effective Date of Last Rate Revision: 09/01/2008
Filing Method of Last Filing: SERFF

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
Union Fidelity Life Insurance Company	15.000%	15.000%	\$1,297	7	\$8,645	15.000%	15.000%

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Rate/Rule Schedule

Review Status:	Document Name:	Affected Form Numbers: (Separated with commas)	Rate Action:	Rate Action Information:	Attachments
Approved	Rate Pages	1-8340, 1-8360, 130-305	Revised	Previous State Filing Number: 39407 Percent Rate Change Request: 15.000	AR Rates.pdf

UNION FIDELITY LIFE INSURANCE COMPANY

Actuarial Justification for Medicare Supplement Rate Increase Pre-Standardized Medicare Supplement Plans

Arkansas Rate Pages

Current Rates

Form Number	Mode				
	Annual	Semi-Annual	Quarterly	Monthly	PAC
130-305	596	298	149	50	50
1-8340	2,330	1,165	583	212	201
1-8360	777	388	194	71	67

Proposed Rate Increase

15.0%

Proposed Rates

Form Number	Mode				
	Annual	Semi-Annual	Quarterly	Monthly	PAC
130-305	686	343	171	57	57
1-8340	2,680	1,340	670	244	231
1-8360	893	447	223	81	77

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Project Name/Number: UFLIC MS RI AR/

Supporting Document Schedules

Satisfied -Name: Health - Actuarial Justification **Review Status:** Accepted for Informational Purposes 08/11/2009

Comments:
Actuarial Memorandum

Attachment:
Pre 2009 - UFLIC- AR.pdf

UNION FIDELITY LIFE INSURANCE COMPANY

Actuarial Justification for Medicare Supplement Rate Increase Pre-Standardized Medicare Supplement Plans

1. Purpose of Filing

This is a rate increase filing for existing Medicare Supplement forms. The purpose of this rate filing is to demonstrate that the anticipated loss ratio of these forms meet the minimum requirements of this state. This rate filing is not intended to be used for any other purpose.

2. Scope of Filing

This filing applies to all of the company's pre-standardized Medicare Supplement business. These forms have similar benefits which supplement Medicare and are therefore being pooled. They will continue to be pooled for all future filings.

The Company is requesting an increase of 15.0% in the premium rates for these forms. Since this is a closed block of issue age business, this rate increase will apply to inforce business only. The number of policyholders, annualized premium inforce and average premium per policy for these forms as of 3/31/09 are as follows:

State	Policies Inforce	Annualized Premium	Average Premium
AK	3	3,947 \$	1,316
AL	14	35,918 \$	2,566
AR	7	8,645 \$	1,235
AZ	26	54,608 \$	2,100
CA	112	245,290 \$	2,190
CO	20	27,192 \$	1,360
DC	11	23,836 \$	2,167
DE	4	7,771 \$	1,943
FL	162	321,745 \$	1,986
GA	30	56,926 \$	1,898
HI	3	6,194 \$	2,065
IA	36	66,908 \$	1,859
ID	17	46,065 \$	2,710
IL	61	122,821 \$	2,013
IN	103	114,102 \$	1,108
KS	1	625 \$	625
KY	65	163,311 \$	2,512
LA	14	38,617 \$	2,758
MA	3	1,713 \$	571
MD	21	54,197 \$	2,581
ME	3	4,653 \$	1,551
MI	22	62,977 \$	2,863
MN	10	3,692 \$	369
MO	64	146,613 \$	2,291
MS	27	61,434 \$	2,275
MT	5	7,426 \$	1,485
NC	110	308,196 \$	2,802
ND	7	11,825 \$	1,689
NE	15	42,519 \$	2,835
NH	1	1,453 \$	1,453
NJ	62	113,028 \$	1,823
NM	12	37,027 \$	3,086
NV	7	18,625 \$	2,661
OH	49	139,577 \$	2,849
OK	20	52,359 \$	2,618
OR	18	38,266 \$	2,126
PA	130	207,029 \$	1,593

UNION FIDELITY LIFE INSURANCE COMPANY

Actuarial Justification for Medicare Supplement Rate Increase Pre-Standardized Medicare Supplement Plans

State	Policies Inforce	Annualized Premium	Average Premium
SC	20	57,195 \$	2,860
SD	12	30,434 \$	2,536
TN	25	47,095 \$	1,884
TX	62	142,904 \$	2,305
UT	9	15,813 \$	1,757
VA	93	130,156 \$	1,400
VT	2	2,772 \$	1,386
WA	37	74,618 \$	2,017
WI	2	3,581 \$	1,791
WV	48	155,051 \$	3,230
WY	2	8,880 \$	4,440
Nationwide:	1,587	3,325,629 \$	2,096

3. Reason for Rate Increase Request

The Company is requesting an increase of 15.0% in premiums to account for adverse experience, medical provider reimbursement rate increases, utilization changes, medical cost shifting, and new medical procedures and technology.

The average nationwide effective date for implementation of this increase has been assumed to be 10/1/2009 for projection purposes. The actual date which the new rates become effective for this state will not be sooner than one year after the implementation date of the last approved rate increase.

4. Rate Increase History

The most recent average nationwide rate increases are as follows:

<u>Calendar Year</u>	<u>Percent Increase</u>	<u>Effective Date</u>	<u>Calendar Year</u>	<u>Percent Increase</u>	<u>Effective Date</u>
1997	9.9%	1/1/1997	2003	7.2%	10/1/2003
1998	14.0%	5/1/1998	2004	6.3%	10/1/2004
1999	12.1%	7/1/1999	2006	7.8%	4/1/2006
2000	11.2%	10/1/2000	2007	8.0%	7/1/2007
2001	15.0%	10/1/2001	2008	7.7%	10/1/2008
2002	10.7%	10/1/2002			

5. Rate Justification Standard - Minimum Loss Ratios

This filing demonstrates that, after implementation of the requested increase, the projected future loss ratio for these forms are higher than the required minimum loss ratio.

Type of Coverage:	Pre-Standardized Medicare Supplement
Renewal Clause:	Guaranteed Renewable
Minimum Required Loss Ratio:	60%

UNION FIDELITY LIFE INSURANCE COMPANY

Actuarial Justification for Medicare Supplement Rate Increase Pre-Standardized Medicare Supplement Plans

6. Projection Assumptions

- a. Interest - A 5.0% effective annual rate of interest has been assumed for accumulating historical experience and for discounting projected future experience to present values.
- b. Persistency - An annual termination rate of 20.0% has been assumed for projecting the inforce into the future.
- c. Claim Cost Trend - An annual claim cost trend of 11.18% has been assumed as the overall claim cost trend. It is comprised of a 2.0% aging component and a medical trend component of 9.0%.
- d. Rate Increase - For purposes of calculating the anticipated lifetime loss ratio, a rate increase of 15.0% effective 10/1/2009 has been assumed. Thereafter, annual rate increases of 9.0% have been assumed in order to keep pace with medical trend.

7. Historical Experience

Historical nationwide experience has been provided for these forms by the Company. Nationwide historical experience since inception is as follows:

Year	Paid Claims by Year Incurred	Remaining Claim Reserve	Incurred Claims	Earned Premium	Loss Ratio
1984 & Prior	94,879,734	0	94,879,734	169,081,058	56.1%
1985	44,283,943	0	44,283,943	84,214,475	52.6%
1986	49,056,124	0	49,056,124	81,829,329	59.9%
1987	49,562,357	0	49,562,357	78,483,772	63.1%
1988	43,944,805	0	43,944,805	68,123,102	64.5%
1989	31,938,837	0	31,938,837	53,361,512	59.9%
1990	31,999,609	0	31,999,609	48,968,215	65.3%
1991	28,958,125	0	28,958,125	44,428,139	65.2%
1992	25,134,184	0	25,134,184	39,243,284	64.0%
1993	22,852,049	0	22,852,049	33,975,701	67.3%
1994	20,404,470	0	20,404,470	29,429,356	69.3%
1995	17,663,098	0	17,663,098	25,156,547	70.2%
1996	15,870,640	0	15,870,640	21,023,903	75.5%
1997	13,839,735	0	13,839,735	17,791,379	77.8%
1998	12,711,285	0	12,711,285	15,017,793	84.6%
1999	10,846,077	0	10,846,077	13,312,830	81.5%
2000	8,997,105	0	8,997,105	11,670,300	77.1%
2001	7,576,101	0	7,576,101	10,374,284	73.0%
2002	6,636,079	0	6,636,079	9,397,197	70.6%
2003	5,674,899	0	5,674,899	8,455,905	67.1%
2004	5,313,086	0	5,313,086	7,376,491	72.0%
2005	5,044,552	0	5,044,552	6,426,307	78.5%
2006	4,317,216	0	4,317,216	5,330,821	81.0%
2007	3,842,170	147,868	3,990,038	4,486,943	88.9%
2008	2,964,785	385,720	3,350,505	3,652,703	91.7%
1/1/09-3/31/09	302,793	423,694	726,487	820,364	88.6%
Total	564,613,856	957,282	565,571,138	891,431,709	63.4%
Accumulated at 5.0%			1,447,468,588	2,343,436,822	61.8%

UNION FIDELITY LIFE INSURANCE COMPANY

Actuarial Justification for Medicare Supplement Rate Increase Pre-Standardized Medicare Supplement Plans

8. Current Loss Ratio at 3/31/09

Historical experience for the most recent calendar year has been restated at 3/31/09 premium and claim levels for purposes of projecting experience loss ratios beyond 3/31/09.

Year	Historical Earned Premium	Current Rate Level Factor*	Current Earned Premium	Historical Incurred Claims	Claim Trend Factor**	Current Incurred Claims	Current Loss Ratio
2008	3,652,703	1.136	4,149,465	3,350,505	1.083	3,627,691	87.4%
1/1/09-3/31/09	820,364	1.021	837,791	726,487	1.013	736,175	87.9%
Total	4,473,067		4,987,255	4,076,992		4,363,866	87.5%

*Adjusts for average nationwide rate increases previously approved.

***Applies a claim cost trend of 11.18% from the midpoint of the period to 3/31/09.

9. Projected Future Experience

Future nationwide experience has been projected for 20 years using the current loss ratio at 3/31/09, annualized premium in force at 3/31/09, and the rate increase and persistency assumptions as follows:

Year	Persistency Factor*	Projected Earned Premium w/o Increase	Current Loss Ratio Factor**	Projected Incurred Claims	Rate Increase Factor***	Projected Earned Premium with Increase	Projected Loss Ratio
3/31/09 Values -->		3,325,629	87.9%				
Rest of 2009	0.920	2,294,002	91.4%	2,097,488	1.038	2,380,027	88.1%
2010	0.757	2,516,149	100.3%	2,524,151	1.176	2,958,676	85.3%
2011	0.605	2,012,919	111.5%	2,245,080	1.282	2,579,966	87.0%
2012	0.484	1,610,335	124.0%	1,996,864	1.397	2,249,730	88.8%
2013	0.387	1,288,268	137.9%	1,776,091	1.523	1,961,765	90.5%
2014	0.310	1,030,614	153.3%	1,579,726	1.660	1,710,659	92.3%
2015	0.248	824,492	170.4%	1,405,072	1.809	1,491,694	94.2%
2016	0.198	659,593	189.5%	1,249,727	1.972	1,300,758	96.1%
2017	0.159	527,675	210.7%	1,111,557	2.150	1,134,261	98.0%
2018	0.127	422,140	234.2%	988,664	2.343	989,075	100.0%
2019	0.102	337,712	260.4%	879,357	2.554	862,474	102.0%
2020	0.081	270,169	289.5%	782,135	2.784	752,077	104.0%
2021	0.065	216,136	321.9%	695,662	3.034	655,811	106.1%
2022	0.052	172,908	357.8%	618,750	3.307	571,867	108.2%
2023	0.042	138,327	397.9%	550,341	3.605	498,668	110.4%
2024	0.033	110,661	442.3%	489,495	3.929	434,839	112.6%
2025	0.027	88,529	491.8%	435,377	4.283	379,179	114.8%
2026	0.021	70,823	546.8%	387,241	4.669	330,644	117.1%
2027	0.017	56,659	607.9%	344,428	5.089	288,322	119.5%
2028	0.014	45,327	675.9%	306,348	5.547	251,417	121.8%
Total				22,463,555		23,781,909	94.5%
		Discounted at 5.0%		16,926,349		18,275,640	92.6%

* Applies a 20.0% annual termination rate from 3/31/09 to the midpoint of the period.

** Applies the current loss ratio, projected using an annual trend factor of 11.18%.

*** Applies a rate increase of 15.0% effective 10/1/2009 with annual increases of 9.0% on 10/1 for each year thereafter.

UNION FIDELITY LIFE INSURANCE COMPANY

Actuarial Justification for Medicare Supplement Rate Increase Pre-Standardized Medicare Supplement Plans

10. Lifetime Anticipated Loss Ratio

The lifetime anticipated loss ratio is defined as the present value of the historical and projected future incurred claims divided by the present value of the historical and projected future earned premiums. The active life reserve is not included in this calculation. These values, previously calculated, are summarized below.

		PV at 5.0%	
	Earned Premium	Incurred Claims	Incurred Loss Ratio
Historical	2,343,436,822	1,447,468,588	61.8%
Projected Future	18,275,640	16,926,349	92.6%
Lifetime	2,361,712,462	1,464,394,936	62.0%

The above demonstrates that both the anticipated future loss ratio and the lifetime anticipated loss ratio are in compliance with minimum loss ratio requirements after implementation of the 15.0% rate increase.

11. Actuarial Certification

To the best of my knowledge and judgment, the following items are true with respect to this filing: the assumptions present my best judgment as to the expected value for each assumption and are consistent with the issuer's business plan at the time of the filing; the anticipated lifetime loss ratio, future loss ratios, and third year loss ratio all exceed the applicable ratio; the filed rates maintain the proper relationship between policies which had different rating methodologies; and the filing was prepared based on the current standards of practice as promulgated by the Actuarial Standards Board. This filing is in compliance with applicable laws and regulations in your state. The benefits are reasonable in relationship to the rates.

Respectfully Submitted,



William M. Reynolds, FSA, MAAA
Consulting Actuary
Wakely and Associates, Inc.
Largo, Florida