

FORM 8-K/A

CURRENT REPORT
PURSUANT TO SECTION 13 OR 15(d) OF THE
SECURITIES EXCHANGE ACT OF 1934

Date of Report (Date of Earliest Event Reported): April 26, 2005

SECURITY NATIONAL FINANCIAL CORPORATION
(Exact name of registrant as specified in this Charter)

| | | |
|---|--------------------------|--------------------------------------|
| Utah | 0-9341 | 87-0345941 |
| ----- | ----- | ----- |
| (State or other jurisdiction of incorporation) | (Commission File Number) | (IRS Employer Identification No.) |

| | |
|---|------------|
| 5300 South 360 West, Salt Lake City, Utah | 84123 |
| ----- | ----- |
| (Address of principal executive offices) | (Zip Code) |

Registrant's Telephone Number, Including Area Code: (801) 264-1060

Does Not Apply
(Former name or former address, if changed since last report)

ITEM 4.01 Changes in Registrant's Certifying Accountant.

On April 26, 2005, Tanner LC ("Tanner") resigned as the independent accountants of Security National Financial Corporation (the "Company"). The resignation by Tanner was due to the five-year partner rotation requirement mandated by the Sarbanes-Oxley Act and the determination by Tanner that in the future it would be unable to maintain the necessary industry expertise to continue as the independent accountants for the Company (a letter from Tanner is attached to this filing as an exhibit). Because Tanner resigned as the Company's independent accountants, the Company's audit committee had no alternative but to accept such resignation by Tanner.

During the fiscal years ended December 31, 2004 and 2003 and the subsequent interim period preceding the cessation of the relationship with Tanner, there were no disagreements (as defined in Item 304(a)(1)(iv) of Regulation S-K) with Tanner on any matter of accounting principles or practices, financial statement disclosure or auditing scope or procedures or any reportable events (as described in Item 304(a)(1)(v) of Regulation S-K), which disagreement, if not resolved to the satisfaction of the former accountants, would have caused it to make reference to the subject matter of the disagreement in connection with its report. In addition, the reports by Tanner on the balance sheet as of December 31, 2004, and the related statements of operations, stockholders' equity, and

cash flows for each of the two years in the period ended December 31, 2004, did not contain an adverse opinion or a disclaimer of opinion and were not qualified or modified as to uncertainty, audit scope or accounting principles.

Pursuant to Item 304 of Regulation S-K, the Company submitted a copy of this amended Form 8-K to Tanner prior to filing with the Commission.

ITEM 9.01 Financial Statements and Exhibits

(c) Exhibits

16.1 Letter from Tanner LC dated April 26, 2005 confirming cessation of the independent auditor relationship.

16.2 Letter from Tanner LC dated June 6, 2005 agreeing with the statements in the amended Form 8-K/A.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

SECURITY NATIONAL FINANCIAL CORPORATION
(Registrant)

Date: June 6, 2005

By: /s/ Scott M. Quist

Scott M. Quist
President and Chief Operating Officer

[Tanner LC Letterhead]

April 16, 2005

Mr. Scott M. Quist
President and Chief Operating Officer
Security National Financial Corporation
5300 South 360 West, Suite 250
Salt Lake City, UT 84123

Dear Mr. Quist:

This is to confirm that the client-auditor relationship between Security National Financial Corporation (Commission File Number 0-9341) and Tanner LC, independent registered public accounting firm, has ceased.

Sincerely,

/s/ Tanner LC

cc: Office of the Chief Accountant
PCAOB Letter File
Securities and Exchange Commission
Mail Stop 9-5
450 Fifth Street, NW
Washington, DC 20549

[Tanner LC Letterhead]

June 6, 2005

Securities and Exchange Commission
Washington, D.C. 20549

Ladies and Gentlemen:

We have read the statements included under Item 4.01 in the Form 8-K/A dated June 6, 2005, of Security National Financial Corporation to be filed with the Securities and Exchange Commission and are in agreement with the statements therein insofar as they relate to our firm.

Very truly yours,

/s/ Tanner LC

MACKEY PRICE THOMPSON & OSTLER
A Professional Corporation
Attorneys and Counselors at Law

American Plaza II
57 West 200 South, Suite 350
Salt Lake City, UT 84101-3663
Telephone 801-575-5000
Fax 801-575-5006

Randall A. Mackey
rmackey@mpwlaw.com

June 7, 2005

VIA FEDERAL EXPRESS

Securities and Exchange Commission
Division of Corporation Finance
450 Fifth Street, N.W., Mail Stop 0408
Judiciary Plaza
Washington, D.C. 20549

Attn: Benjamin Phippen
Staff Accountant

Re: Security National Financial Corporation - Amendment No.1 to Form 8-K,
as filed on May 3, 2005, File No. 000-09341

Ladies and Gentlemen:

In connection with the above-captioned Form 8-K (the "Form 8-K"), we enclose the following with the Securities and Exchange Commission (the "Commission") for review on behalf of Security National Financial Corporation (the "Company"):

- A. Two conformed copies of Amendment No. 1 (the "Amendment") to the Form 8-K, including exhibits; and
- B. Two additional conformed copies of Amendment No. 1 to the Form 8-K, which have been marked to indicate changes from the Form 8-K filed with the Commission on May 3, 2005.

It should be noted that the Company electronically filed the Amendment to the Form 8-K via the Edgar system on June 7, 2005.

We are also enclosing a copy of the comment letter dated May 31, 2005, which we received from the staff of the Commission. The following responses to the comments are tied to the numbered paragraphs on the enclosed comment letter.

1. The Form 8-K has been revised to state that Tanner LC ("Tanner") resigned as the independent accountants of the Company due to the five-year partner rotation requirement mandated by the Sarbanes-Oxley Act and the determination by Tanner that in the future it would be unable to maintain the necessary industry expertise to continue as the Company's independent accountants.

2. Because Tanner resigned as the Company's independent accountants, the Company's audit committee had no choice but to accept such resignation by Tanner. However, the Company's audit committee approved the engagement of Hansen, Barnett & Maxwell, P.C. ("Hansen") as the new independent accountants to replace Tanner.

3. The Company reported engagement of Hansen in a Form 8-K that was filed with the Securities and Exchange Commission on May 25, 2005. The disclosures in the May 25, 2005 Form 8-K about consultations with Hansen were made through the date of engagement.

4. In response to this comment, a letter from Tanner, the Company's former independent accountants, addressing the revised disclosures have been included as Exhibit 16 to an amended Form 8-K. The amended Form 8-K, or Form 8-K/A, includes the Item 4 designation.

The Company has prepared Amendment No. 1 to the Form 8-K in an effort to respond to the comments from the staff. Any additional comments or questions should be directed to Randall A. Mackey, Esq, at (801) 575-5000, counsel for the Company.

Very truly yours,

/s/ Randall A. Mackey
Randall A. Mackey

Enclosures

cc: Scott M. Quist (w/encls.)
G. Robert Quist (w/encls.)
Stephen M. Sill (w/encls.)
Virgil R. Pugsley (w/encls.)
Douglas J. Hansen