

REPORT ON EXAMINATION

OF THE

ALLEGANY CO-OP INSURANCE COMPANY

AS OF

DECEMBER 31, 2011

DATE OF REPORT

MAY 24, 2013

EXAMINER

WAYNE LONGMORE

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NEW YORK STATE  
DEPARTMENT *of*  
FINANCIAL SERVICES

Andrew M. Cuomo  
Governor

Benjamin M. Lawsky  
Superintendent

May 24, 2013

Honorable Benjamin M. Lawsky  
Superintendent of Financial Services  
Albany, New York 12257

Sir:

Pursuant to the requirements of the New York Insurance Law, and in compliance with the instructions contained in Appointment Number 30887 dated October 9, 2012, attached hereto, I have made an examination into the condition and affairs of Allegany Co-op Insurance Company as of December 31, 2011, and submit the following report thereon.

Wherever the designation “the Company” appears herein without qualification, it should be understood to indicate Allegany Co-op Insurance Company.

Wherever the term “Department” appears herein without qualification, it should be understood to mean the New York State Department of Financial Services.

The examination was conducted at the Company’s home office located at 9 North Branch Road, Cuba NY, 14727.

## 1. SCOPE OF EXAMINATION

The Department has performed an individual examination of the Company, a single-state insurer. The previous examination was conducted as of December 31, 2006. This examination covered the five-year period from January 1, 2007 through December 31, 2011. Transactions occurring subsequent to this period were reviewed where deemed appropriate by the examiner.

This examination was conducted in accordance with the National Association of Insurance Commissioners (“NAIC”) Financial Condition Examiners Handbook (“Handbook”), which requires that we plan and perform the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company including corporate governance, identifying and assessing inherent risks within the Company and evaluating system controls and procedures used to mitigate those risks. This examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation, management’s compliance with Statutory Accounting Principles and annual statement instructions when applicable to domestic state regulations.

All financially significant accounts and activities of the Company were considered in accordance with the risk-focused examination process. The examiners also relied upon audit work performed by the Company’s independent public accountants when appropriate.

This examination report includes a summary of significant findings for the following items as called for in the Handbook:

- Significant subsequent events
- Company history
- Corporate records
- Management and control
- Fidelity bonds and other insurance
- Territory and plan of operation
- Growth of Company
- Loss experience
- Reinsurance
- Accounts and records
- Statutory deposits
- Financial statements
- Summary of recommendations

A review was also made to ascertain what action was taken by the Company with regard to comments and recommendations contained in the prior report on examination.

This report on examination is confined to financial statements and comments on those matters that involve departures from laws, regulations or rules, or that are deemed to require explanation or description.

## 2. DESCRIPTION OF COMPANY

Allegany Co-op Insurance Company was organized under the laws of the State of New York on April 3, 1887 as the Allegany County Farmers' Co-operative Fire Insurance Company, for the purpose of transacting business as an assessment co-operative fire insurance company in Allegany County, New York. It became licensed on April 3, 1887 and commenced business on April 15, 1887. A certificate, issued by this Department on July 19, 1971, permitted the Company to change its name to the Allegany Co-op Insurance Company.

During 2007, the policyholders of Allegany Co-op Insurance Company approved the conversion of the Company to an advance premium co-operative and the subsequent merger of the Company with Monroe Co-op Insurance Company, of Rochester New York ("Monroe"). On October 1, 2007 a merger was effected between the Company and Monroe with the Company as the surviving entity.

On December 11, 2007, the Company purchased a surplus note totaling \$1 million issued by Conemaugh Valley Mutual Insurance Company of Johnstown, Pennsylvania ("CVMIC"). CVMIC is an insurance company licensed in Pennsylvania that provides property and liability coverage in that state.

### A. Management

Pursuant to the Company's charter and by-laws, management of the Company is vested in a board of directors consisting of not less than nine or more than fifteen members. The board met at least four times during each calendar year for the period under examination. At December 31, 2011, the board of directors was comprised of the following nine members:

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>
Donald G. Bennett Pittsford, NY	CFO, Art Craft Optical Company
Rae A. Clark Jr. Pittsford, NY	Attorney, Sutton, DeLeeuw, Clark & Darcy PLLC
Marcia J. Davies Freedom, NY	Retired
Edward L. Gilbert Rushford, NY	Dairy Farmer and Insurance Agent
Kevin O. Harris Wellsville, NY	Retired
Erland E. Kailbourne Honeoye Falls, NY	Chairman, Albany International Corporation
Mathew F. Minor Brockport, NY	Senior Loan Officer, Farm Credit of Western New York
Rodney R. Stettner Spencerport, NY	Farmer
Duane A. Vaclavik Fillmore, NY	Retired

A review of the minutes of the board of directors' meetings held during the examination period indicated that the meetings were generally well attended and each board member had an acceptable record of attendance.

As of December 31, 2011, the principal officers of the Company were as follows:

<u>Name</u>	<u>Title</u>
Duane A. Vaclavik	Chairman of the Board
Randall S. Peters	President and Chief Executive Officer
Marcia J. Davies	Secretary
Holly A. Thropp	Treasurer

B. Territory and Plan of Operation

As of December 31, 2011, the Company was licensed as an advance premium insurance company to transact business within all the counties of the State of New York. The Company was licensed to write business in New York only.

As of the examination date, the Company was authorized to transact the kinds of insurance as defined in the following numbered paragraphs of Section 1113(a) of the New York Insurance Law:

<u>Paragraph</u>	<u>Line of Business</u>
4	Fire
5	Miscellaneous property
6	Water damage
7	Burglary and theft
8	Glass
9	Boiler and machinery
10	Elevator
11	Animal
12	Collision
13	Personal injury liability
14	Property damage liability
19	Motor vehicle and aircraft physical damage
20	Marine and inland marine (inland only)

Based on the lines of business for which the Company is licensed and pursuant to the requirements of Articles 13, 66 and 41 of the New York Insurance Law, the Company is required to maintain a minimum surplus to policyholders in the amount of \$950,000.

The following schedule shows the direct premiums written by the Company in New York for the period under examination:

<u>Calendar Year</u>	<u>Direct Written Premiums</u>
2007	\$12,969,429
2008	\$13,243,514
2009	\$12,964,997
2010	\$12,810,740
2011	\$12,756,851

The Company's predominant lines of business are commercial multiple peril and homeowners multiple peril, which accounted for 45% and 39%, respectively, of the Company's 2011 direct written business. The Company writes mainly through approximately 300 independent agents and a director-agent.

C. Reinsurance

Assumed reinsurance

Assumed reinsurance accounted for 13% of the Company's gross premium written at December 31, 2011. Approximately 96% of the Company's assumed business is attributable to the business assumed from the Company's affiliate, CVMIC. The remainder of the Company's assumed premiums are from the FAIR Plan, a mandated pool. During the period covered by this examination, the Company's assumed reinsurance business has increased by \$576,955 or 43% since the last examination. The Company utilizes reinsurance accounting as defined in Statement of Statutory Accounting Principle ("SSAP") No. 62R for all of its assumed reinsurance business.

Effective January 1, 2009, the Company entered into quota share reinsurance agreements with its affiliate CVMIC. Under the terms of these agreements, CVMIC cedes 100% of its assumed and direct business to the Company, net of any external reinsurance. The Company in-turn pays to CVMIC its quota share of losses under the policies, loss adjustment expenses, extra contractual obligations and losses in excess of the policy limits covered under the contract subject to a limit of \$175,000 each risk, each individual loss, property, per occurrence, casualty, subject to a maximum of \$187,500 for each and every loss occurrence. The Company then retrocedes 11% quota share of its net business written or assumed to CVMIC. CVMIC shall pay to the Company its quota share of losses under the policies, loss adjustment expenses, extra contractual obligations and losses in excess of the policy limits covered under the contract subject to a limit of \$19,250 (being 11% of a maximum of \$175,000) each risk, each individual loss, property, per occurrence, casualty, subject to a maximum of \$55,000 for each and every loss occurrence.

The agreements were non-objected to by the Department in letters dated December 17, 2008 and July 27, 2009.

Ceded reinsurance

The Company has structured its ceded reinsurance program as of December 31, 2011, as follows:

<u>Type of Treaty</u>	<u>Cession</u>
<u>Property and Casualty Combination Excess</u> 100% Authorized or Certified	<u>Property Business (Layer 1):</u> \$800,000 excess \$200,000 each loss, each risk; subject to an occurrence limit of \$2 million.  <u>Casualty Business (Layer 1):</u> \$800,000 excess \$200,000 per occurrence.  <u>Casualty and property combined:</u> In the event of a loss occurrence involving at least one property policy and one casualty policy: \$200,000 excess \$200,000 each loss occurrence.
<u>Casualty Clash Excess of Loss</u> 100% Authorized or Certified	\$2 million excess \$1 million ultimate net loss per occurrence. With respect to Workers' Compensation Insurance required by subsection (j) of Section 3420 of the New York Insurance Law, no claim shall be made unless the Company shall have first sustained an ultimate net loss in excess of \$3 million. The reinsurer shall then reimburse the Company the whole of such excess.
<u>Property Catastrophe Excess (3 layers)</u> <u>Layer 1</u> 100% Authorized or Certified	95% of \$500,000 excess \$500,000 ultimate net loss each loss occurrence (involving three or more risks)
<u>Layer 2</u> 100% Authorized or Certified	95% of \$500,000 excess \$1,000,000 ultimate net loss each loss occurrence (involving three or more risks).
<u>Layer 3</u> 100% Authorized or Certified	100% of ultimate net loss excess \$1,500,000 each loss occurrence (involving three or more risks).
<u>Casualty Excess Facultative</u>  100% Authorized or Certified Covering policies classified by the Company as Comprehensive Personal Liability, Farmowners Comprehensive Personal Liability, Commercial General Liability and Farmowners Commercial General Liability	\$1 million excess \$1 million each loss occurrence, each policy. Subject to an annual aggregate limit of \$2 million, inclusive of loss adjustment expenses during the term of the contract for all acts of Terrorism as covered by the contract.

<u>Type of Treaty</u>	<u>Cession</u>
<u>Property Facultative Per Risk Excess of Loss</u>  100% Authorized or Certified	\$2,000,000 excess \$1,000,000 each loss, each risk. However, if the cession is greater than \$250,000, the maximum cession as respects any one animal shall not exceed \$250,000.
<u>Equipment Breakdown 100% quota share (Commercial Multi-peril policies and other policies as agreed)</u>  100% Authorized	100% of the Company's net retained liability, cessions limited to \$5,000,000 any one risk.

The Company is also noted to have property facultative coverage available on an offer and acceptance basis.

It is the Company's policy to obtain the appropriate collateral for its cessions to unauthorized reinsurers.

All significant ceded reinsurance agreements in effect as of the examination date were reviewed. Except as noted herein, these contracts were found to contain the required clauses, including insolvency clause meeting the requirements of Section 1308 of the New York Insurance Law.

Examination review of the Schedule F data reported by the Company in its filed annual statement was found to accurately reflect its material reinsurance transactions. Additionally, management has represented that all material ceded reinsurance agreements transfer both underwriting and timing risk as set forth in SSAP No. 62R. Representations were supported by appropriate risk transfer analyses and an attestation from the Company's Chief Executive Officer and Chief Financial Officer pursuant to the NAIC Annual Statement Instructions. Additionally, examination review indicated that the Company was not a party to any finite reinsurance agreements. All ceded reinsurance agreements were accounted for utilizing reinsurance accounting as set forth in SSAP No. 62R.

D. Affiliated Group

At December 31, 2011, the Company is affiliated with Conemaugh Valley Mutual Insurance Company by virtue of the Company's purchase of CVMIC's \$1Million surplus note, quota share reinsurance agreements between the two companies, an expense sharing agreement, an affiliation agreement, a President in common, as well as shared directors.

At December 31, 2011, the Company was party to the following agreements with CVMIC:

Affiliated Reinsurance Agreements

The Company assumes 100% of the direct and assumed business written by CVMIC, net of outside reinsurance, and retrocedes 11% of its direct and assumed business to CVMIC as more fully explained in Item 2C of this report.

Amended and Restated Affiliation Agreement

Effective December 11, 2007, the Company entered into an affiliation agreement with CVMIC. The agreement calls for CVMIC to enter into expense sharing and reinsurance agreements with the Company. The agreement also calls for The Company to advance to CVMIC, at the effective time of the affiliation, an amount not to exceed \$1 million evidenced by a surplus note.

This agreement was filed with the Department and was non-disapproved on November 28, 2007.

Expense Sharing Agreement

The Company is party to an expense sharing agreement with affiliate CVMIC, made effective December 11, 2007. The agreement provides for the sharing of certain expenses among the parties and defines the methods to be used for allocating such expenses.

The review of the allocation of expenses between the parties revealed that the charges appeared reasonable and in accordance with the requirements of Department Regulation No. 30.

This agreement was filed with the Department and was non-disapproved on November 28, 2007.

E. Significant Operating Ratios

The following ratios have been computed as of December 31, 2011, based upon the results of this examination:

Net premiums written to surplus as regards policyholders	50%
Liabilities to liquid assets (cash and invested assets less investments in affiliates)	38%
Premiums in course of collection to surplus as regards policyholders	2%

All of the above ratios fall within the benchmark ranges set forth in the Insurance Regulatory Information System of the National Association of Insurance Commissioners.

The underwriting ratios presented below are on an earned/incurred basis and encompass the five-year period covered by this examination:

	<u>Amounts</u>	<u>Ratios</u>
Losses and loss adjustment expenses incurred	\$29,219,607	49.77%
Other underwriting expenses incurred	22,033,815	37.53
Net underwriting loss	<u>7,458,831</u>	<u>12.70</u>
Premiums earned	<u>\$58,712,253</u>	<u>100.00%</u>

F. Accounts and Records

i. Unsecured reinsurance disclosure

The previous report on examination included the following recommendation:

*It is recommended that the Company make the required disclosure regarding unsecured reinsurance recoverables in future filed annual statements pursuant to SSAP No. 62 and the NAIC Annual Statement Instructions.*

SSAP 62R paragraph 72 states in part:

If the entity has with any individual reinsurers, authorized or unauthorized, an unsecured aggregate recoverable for losses, paid and unpaid including IBNR, loss adjustment

expenses, and unearned premium, that exceeds 3% of the entity's policyholder surplus, list each individual reinsurer and the unsecured aggregate recoverable pertaining to that reinsurer.

In 2011 there were no reinsurers with unsecured reinsurance recoverables in excess of the 3% of surplus limit; however, there was at least one reinsurer with unsecured reinsurance recoverable balances in excess of the limit in each of the previous four years and this was not disclosed in the Notes to Financial Statements as required by SSAP No. 62R paragraph 72.

It is again recommended that the Company make the required disclosure regarding unsecured reinsurance recoverables in its filed annual statements pursuant to SSAP No. 62R and the NAIC Annual Statement Instructions.

ii. Certified Public Accountant ('CPA') Contract

Part 89.8 "Notification of adverse financial condition" of Department Regulation 118 states in part:

*a) Every company required to furnish an annual audited financial report shall require the CPA to submit written notification to the superintendent, the board of directors and the company's audit committee within five business days of any determination by the CPA that the company has materially misstated its financial condition as reported to the superintendent as of the balance sheet date currently under audit or that the company does not meet the minimum capital or surplus requirement of the insurance law as of that date...*

The examiner's review of the Company's contract with its independent auditor for the 2011 audit revealed that the contract required notification within fifteen days of any determination by the CPA that the Company had materially misstated its financial condition, rather than five days as required by Part 89.8 of Department Regulation 118.

It is recommended that the Company ensure that the contract with its CPA firm complies with the requirements of Department Regulation 118.

### 3. FINANCIAL STATEMENTS

#### A. Balance Sheet

The following shows the assets, liabilities and surplus as regards policyholders as of December 31, 2011 as determined by this examination and as reported by the Company:

<u>Assets</u>	<u>Assets</u>	<u>Assets Not Admitted</u>	<u>Net Admitted Assets</u>
Bonds	\$24,006,453	\$ 0	\$24,006,453
Preferred stocks (stocks)	531,238	0	531,238
Common stocks (stocks)	5,838,480	0	5,838,480
Real estate: Properties occupied by the company	1,115,419	0	1,115,419
Cash, cash equivalents and short-term investments	2,075,948	0	2,075,948
Other invested assets	1,000,000	1,000,000	0
Aggregate write-ins for invested assets	(17)	0	(17)
Investment income due and accrued	137,574	0	137,574
Uncollected premiums and agents' balances in the course of collection	535,309	0	535,309
Deferred premiums, agents' balances and installments booked but deferred and not yet due	1,707,583	2,719	1,704,864
Amounts recoverable from reinsurers	33,453	0	33,453
Funds held by or deposited with reinsured companies	1,597,000	0	1,597,000
Current federal and foreign income tax recoverable and interest thereon	293,009	0	293,009
Net deferred tax asset	506,663	0	506,663
Electronic data processing equipment and software	21,101	4,350	16,751
Furniture and equipment, including health care delivery assets	29,735	29,735	0
Receivables from parent, subsidiaries and affiliates	13,965	0	13,965
Aggregate write-ins for other than invested assets	<u>260,119</u>	<u>206</u>	<u>259,913</u>
Total assets	<u>\$39,703,032</u>	<u>\$1,037,010</u>	<u>\$38,666,022</u>

Liabilities, Surplus and Other FundsLiabilities

Losses and loss adjustment expenses		\$ 4,150,675
Reinsurance payable on paid losses and loss adjustment expenses		6,286
Commissions payable, contingent commissions and other similar charges		710,134
Other expenses (excluding taxes, licenses and fees)		652,466
Taxes, licenses and fees (excluding federal and foreign income taxes)		7,586
Unearned premiums		7,046,163
Advance premium		255,560
Ceded reinsurance premiums payable (net of ceding commissions)		102,734
Funds held by company under reinsurance treaties		<u>1,135,000</u>
Total liabilities		<u>\$14,066,604</u>

Surplus and Other Funds

Special contingent surplus	\$ 547,227	
Unassigned funds (surplus)	<u>24,052,191</u>	
Surplus as regards policyholders		<u>24,599,418</u>
Total liabilities, surplus and other funds		<u>\$38,666,022</u>

Note: The Internal Revenue Service has not yet begun to audit tax returns covering the years 2007 through 2011. The examiner is unaware of any potential exposure of the Company to any tax assessment and no liability has been established herein relative to such contingency.

B. Statement of Income

Surplus as regards policyholders increased \$9,740,537 during the five-year examination period January 1, 2007 through December 31, 2011, detailed as follows:

Underwriting Income

Premiums earned		\$58,712,253
Deductions:		
Losses and loss adjustment expenses incurred	\$29,219,607	
Other underwriting expenses incurred	<u>22,033,815</u>	
Total underwriting deductions		<u>51,253,422</u>
Net underwriting gain or (loss)		\$ 7,458,831

Investment Income

Net investment income earned	\$ 3,498,345	
Net realized capital gain	<u>309,639</u>	
Net investment gain or (loss)		3,807,984

Other Income

Net gain or (loss) from agents' or premium balances charged off	\$ 63,503	
Finance and service charges not included in premiums	846,626	
Aggregate write-ins for miscellaneous income	<u>37,322</u>	
Total other income		<u>947,451</u>
Net income after dividends to policyholders but before federal and foreign income taxes		\$12,214,266
Federal and foreign income taxes incurred		<u>3,565,593</u>
Net Income		\$ <u>8,648,673</u>

Surplus as regards policyholders per report on examination as of December 31, 2006			\$14,858,881
	<u>Gains in</u> <u>Surplus</u>	<u>Losses in</u> <u>Surplus</u>	
Net income	\$ 8,648,674		
Net unrealized capital gains or (losses)	725,737		
Change in net deferred income tax		\$302,098	
Change in nonadmitted assets		263,775	
Surplus adjustments paid in	<u>931,999</u>	<u>0</u>	
Total gains and losses	<u>\$10,306,410</u>	<u>\$565,873</u>	
Net increase (decrease) in surplus			\$ <u>9,740,537</u>
Surplus as regards policyholders per report on examination as of December 31, 2011			<u>\$24,599,418</u>

#### **4. LOSSES AND LOSS ADJUSTMENT EXPENSES**

The examination liability for the captioned items of \$4,150,675 is the same as reported by the Company as of December 31, 2011. The examination analysis was conducted in accordance with generally accepted actuarial principles and practices and was based on statistical information contained in the Company's internal records and in its filed annual statements.

## 5. COMPLIANCE WITH PRIOR REPORT ON EXAMINATION

The prior report on examination contained eleven recommendations as follows (page numbers refer to the prior report):

<u>ITEM</u>	<u>PAGE NO.</u>
A. <u>Reinsurance</u>	
i. It is recommended that the Company comply with Section 308 of the New York Insurance Law and file with the Superintendent changes in its inter-company reinsurance treaties as specified in Department Circular Letter 17 (2001) at least thirty days in advance of the effective date.	7
The Company has complied with this recommendation.	
ii. It is recommended that the Company comply with Section 1308(e) of the New York Insurance Law and file its reinsurance treaties with the Department for review, when the amount of reinsurance ceded is greater than 50% of the unearned premiums reserves reported at the beginning of each year.	7
The Company has complied with this recommendation.	
B. <u>Accounts and Records</u>	
i. It is recommended that when entering into custodial agreement in the future, the Company comply with the NAIC Financial Condition Examiners Handbook Part 1 Section IV J.	9
The Company has complied with this recommendation.	
ii. It is recommended that the Company comply with Section 6611(a)(4)(C) of the New York Insurance Law regarding signatory requirements on checks.	9
The Company has complied with this recommendation.	
iii. It is recommended that, henceforth, the Company classify shares in mutual funds in accordance with SSAP No. 30.	9
The Company has complied with this recommendation.	
iv. It is recommended that the Company classify inter-company balances in accordance with the NAIC Annual Statement Instructions.	10
The Company has complied with this recommendation.	

ITEMPAGE NO.

- v. It is recommended that the Company make the required disclosure regarding unsecured reinsurance recoverables in future filed annual statements pursuant to SSAP No. 62 and the NAIC Annual Statement Instructions. 10

The Company has not complied with this recommendation. A similar comment is made in this report.

C. Market Conduct Activities

- i. It is recommended that the Company comply with Section 6609(b) of the New York Insurance Law and file with this Department for approval all of its policy forms prior to use. 15

The Company has complied with this recommendation.

- ii. It is recommended that the Company comply with Part 216.9 of Department Regulation 64 and notify claimants in writing at the time payments are made to claimant's attorneys in third party liability settlements of \$5,000 or more. 15

The Company has complied with this recommendation.

- iii. It is recommended that the Company ensure that advertisements, public announcements, etc., that it reimburses, in whole or in part, agents or brokers for are in compliance with Section 2122(b) of the New York Insurance Law. 16

The Company has complied with this recommendation.

- iv. It is recommended that the Company state the specific reason or reasons for non-renewal in all non-renewal notices of personal lines policies in order to comply with Section 3425(d)(1) of the New York Insurance Law. 16

The Company has complied with this recommendation.

**6. SUMMARY OF COMMENTS AND RECOMMENDATIONS**

<u>ITEM</u>		<u>PAGE NO.</u>
B.	<u>Accounts and Records</u>	
i	It is again recommended that the Company make the required disclosure regarding unsecured reinsurance recoverables in its filed annual statements pursuant to SSAP No. 62R and the NAIC Annual Statement Instructions.	11
ii.	It is recommended that the Company ensure that the contract with its CPA firm complies with the requirements of Department Regulation 118.	11

Respectfully submitted,

\_\_\_\_\_/s/  
Wayne Longmore  
Senior Insurance Examiner

STATE OF NEW YORK     )  
  )ss:  
COUNTY OF NEW YORK    )

Wayne Longmore, being duly sworn, deposes and says that the foregoing report, subscribed by him, is true to the best of his knowledge and belief.

\_\_\_\_\_/s/  
Wayne Longmore

Subscribed and sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_, 20xx.

APPOINTMENT NO. 30887

NEW YORK STATE  
**DEPARTMENT OF FINANCIAL SERVICES**

I, BENJAMIN M. LAWSKY, Superintendent of Financial Services of the State of New York, pursuant to the provisions of the Financial Services Law and the Insurance Law, do hereby appoint:

*Wayne Longmore*

*as a proper person to examine the affairs of the*

**ALLEGANY CO-OP INSURANCE COMPANY.**

*and to make a report to me in writing of the condition of said*

**COMPANY**

*with such other information as he shall deem requisite.*

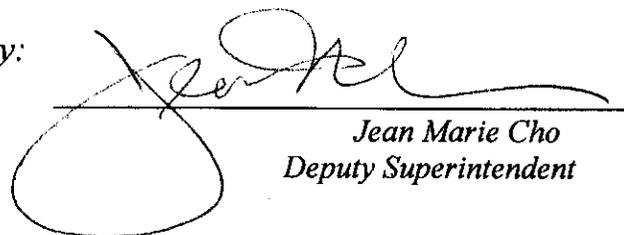
*In Witness Whereof, I have hereunto subscribed by name  
and affixed the official Seal of the Department  
at the City of New York*

*this 9th day of October, 2012*

**BENJAMIN M. LAWSKY**  
*Superintendent of Financial Services*



By:

  
\_\_\_\_\_  
Jean Marie Cho  
Deputy Superintendent