



NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
REPORT ON EXAMINATION
OF THE
VANTIS LIFE INSURANCE COMPANY OF NEW YORK

CONDITION:

DECEMBER 31, 2011

DATE OF REPORT:

OCTOBER 8, 2014

NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES

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OF THE

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EXAMINER:

JO'CATENA HARGROVE

TABLE OF CONTENTS

<u>ITEM</u>	<u>PAGE NO.</u>
1. Executive summary	2
2. Scope of examination	3
3. Description of Company	4
A. History	4
B. Holding company	4
C. Management	5
D. Territory and plan of operation	7
E. Reinsurance	8
4. Significant operating results	9
5. Financial statements	11
A. Independent accountants	11
B. Net admitted assets	11
C. Liabilities, capital and surplus	12
D. Condensed summary of operations	13
E. Capital and surplus account	13
6. Market conduct activities	14
A. Advertising and sales activities	14
B. Underwriting and policy forms	15
C. Treatment of policyholders	16
7. Internal audit function	17
8. Summary and conclusions	18



NEW YORK STATE
DEPARTMENT *of*
FINANCIAL SERVICES

Andrew M. Cuomo
Governor

Benjamin M. Lawsky
Superintendent

November 6, 2014

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

Sir:

In accordance with instructions contained in Appointment No. 30824, dated March 30, 2012 and annexed hereto, an examination has been made into the condition and affairs of Vantis Life Insurance Company of New York, hereinafter referred to as “the Company,” at its administrative office located at 200 Day Hill Road, Windsor, Connecticut 06095. The Company’s home office is located at 162 Prospect Hill Road, Brewster, New York 10509.

Wherever “Department” appears in this report, it refers to the New York State Department of Financial Services.

The report indicating the results of this examination is respectfully submitted.

1. EXECUTIVE SUMMARY

The material violations and recommendation contained in this report are summarized below.

- The Company violated Section 4228(f)(1)(A) of the New York Insurance Law by paying agent compensation during the examination period according to schedules of agent compensation that were never filed with the Department.
- The Company violated Section 4211(a) of the New York Insurance Law by failing to file its notices of election of directors for all three years under exam.
- The Company violated Section 51.6(b)(4) of Department Regulation No. 60 by failing to provide to the insurer whose coverage was being replaced a copy of the sales material, proposal and Disclosure Statement used in the sale of the proposed life insurance policy within 10 days of receipt of the application.
- The Company violated Section 51.6(e) of the Department Regulation No. 60 by failing to file for approval the replacement procedures using direct mail solicitation.
- The Company violated Section 3209(b)(1) of the New York Insurance Law by failing to provide the preliminary information to the policyholder at or prior to the time an application was taken.
- The Company violated Section 3209(e) of the New York Insurance Law by failing to include a date on the policy summary.
- The examiner recommends that the Company establish and maintain an independent, adequately resourced, and competently staffed internal audit function to provide management with ongoing assessments of the Company's risk management processes and the accompanying system of internal controls. To the extent that audits performed by an affiliate on a functional basis are intended to encompass the activities of the Company, it should be clear from the audit workpapers that Company transactions or activities are specifically included in the samples reviewed by internal audit.

2. SCOPE OF EXAMINATION

This is the first examination of the Company since it was licensed on January 23, 2009. This examination covers the period from inception through December 31, 2011. As necessary, the examiner reviewed transactions occurring subsequent to December 31, 2011 but prior to the date of this report (i.e., the completion date of the examination).

The examination comprised a verification of assets and liabilities as of December 31, 2011 to determine whether the Company's 2011 filed annual statement fairly presents its financial condition. The examiner reviewed the Company's income and disbursements necessary to accomplish such verification and utilized the National Association of Insurance Commissioners' Examiners Handbook or such other examination procedures, as deemed appropriate, in such review and in the review or audit of the following matters:

- Company history
- Management and control
- Corporate records
- Fidelity bond and other insurance
- Officers' and employees' welfare and pension plans
- Territory and plan of operation
- Market conduct activities
- Growth of Company
- Business in force by states
- Mortality and loss experience
- Reinsurance
- Accounts and records
- Financial statements

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

3. DESCRIPTION OF COMPANY

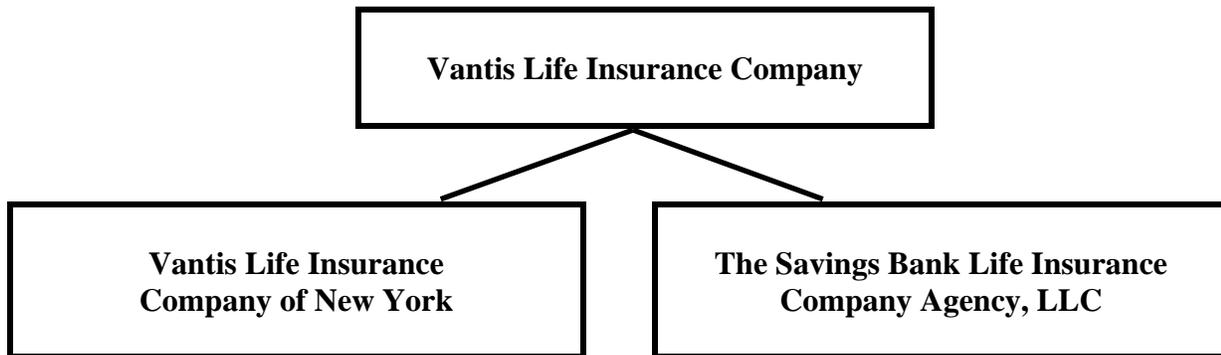
A. History

The Company was incorporated as a stock life insurance company under the laws of New York on March 1, 2007, was licensed and commenced business on January 23, 2009. Initial resources of \$6,400,000, consisting of common capital stock of \$2,000,000 and paid in and contributed surplus of \$4,400,000, were provided through the sale of 20,000 shares of common stock (with a par value of \$100 each) to its parent.

B. Holding Company

The Company is a wholly owned subsidiary of Vantis Life Insurance Company (“VLIC”), a Connecticut life insurance company.

An organization chart reflecting the relationship between the Company and significant entities in its holding company system as of December 31, 2011 follows:



The Company had one service agreement in effect with affiliates during the examination period:

Type of Agreement and Department File Number	Effective Date	Provider(s) of Service(s)	Recipient(s) of Service(s)	Specific Service(s) Covered	Income/ (Expense)* For Each Year of the Examination
Underwriting Management and Administrative Services Agreement Department File No. 37858	01/23/09	Vantis Life Insurance Company	Vantis Life Insurance Company of New York	Underwriting duties, claims services, actuarial services, policyholder services, accounting and certain other administrative functions.	2009 \$ 0 2010 \$ 0 2011 \$(150,636)

* Amount of Income or (Expense) Incurred by the Company

The Company participates in a federal income tax allocation agreement with its parent and affiliate.

C. Management

The Company's by-laws provide that the board of directors shall be comprised of not less than nine and not more than 13 directors. The number of directors shall be increased to not less than thirteen within one year following the end of the calendar year in which the Company shall exceed one and one-half billion dollars in admitted assets. Directors are elected for a period of three years at the annual meeting of the stockholders held in June of each year. As of December 31, 2011, the board of directors consisted of ten members. Meetings of the board are held annually.

The ten board members and their principal business affiliation, as of December 31, 2011, were as follows:

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
Richard P. Bellacero* Scarsdale, NY	Vice President Countrywide Investment Services, Inc	2008
Rheo A. Brouillard* Hampton, CT	President and Chief Executive Officer Savings Institute Bank & Trust Company	2008

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
J. Edward Diamond* New York, NY	Retired Executive Vice President New Alliance Bank	2008
Bryan J. Huebner* Easton, CT	Retired Executive Vice President People's Bank	2008
David W. Libbey* Grafton, MA	Retired Vice President Manulife Financial	2008
Paul R. McConnell* Marblehead, MA	Retired President and Chief Executive Officer Liberty Bank	2008
Peter K. Mulligan* Vernon, CT	Retired Senior Executive Vice President Webster Bank	2008
John J. Patrick, Jr.* Glastonbury, CT	President and Chief Executive Officer Farmington Savings Bank	2008
Duncan C. Stoddard* Groton, CT	Retired President and Chief Executive Officer Chelsea Groton Savings Bank	2008
Peter L. Tedone Simsbury, CT	President and Chief Executive Officer Vantis Life Insurance Company of New York	2008

* Not affiliated with the Company or any other company in the holding company system

The examiner's review of the minutes of the meetings of the board of directors and its committees indicated that meetings were well attended and that each director attended a majority of meetings.

Section 4211(a) of the New York Insurance Law states, in part:

"No election of directors of a domestic stock life insurance company shall be valid unless a copy of the notice of election shall have been filed in the office of the superintendent at least ten days before the day of such election . . ."

The review of the Company's minutes as well as the Department's records revealed that the Company did not file its annual notice of election, as required, for each of the three years during the examination period.

The Company violated Section 4211(a) of the New York Insurance Law by failing to file its notices of election of directors for each of the three years under exam.

The following is a listing of the principal officers of the Company as of December 31, 2011:

<u>Name</u>	<u>Title</u>
Peter L. Tedone	President and Chief Executive Officer
Gail E. Lataille	Senior Vice President and Treasurer
Scott E. Smith*	Executive Vice President, Chief Operating Officer & Corporate Secretary
Craig D. Simms	Senior Vice President - Marketing
Bruce A. Friedland	Senior Vice President and Chief Actuary
Edmund V. Mahoney	Vice President - Investments

* Designated consumer services officer per Section 216.4(c) of Department Regulation No. 64

D. Territory and Plan of Operation

The Company is authorized to write life insurance, annuities and accident and health insurance as defined in paragraphs 1, 2 and 3 of Section 1113(a) of the New York Insurance Law.

The Company is only licensed to transact business in New York. In 2011, 100% of life insurance premiums were received from New York. Policies are written on a non-participating basis.

The Company offers a full portfolio of individual term life and traditional permanent life products. All products are customized for bank distribution and are available for internet-based quotation and application.

The Company's "SuperEZ" simplified issue term life product portfolio provides 10, 15, and 20-year level premium options with no medical exam. The Company's fully underwritten "SuperTerm" level term life insurance product line provides 10, 15, 20, 25, and 30-year level premium options. The Company's level term products can be converted to permanent life insurance without evidence of insurability. The Company also offers a single premium children's term life product.

The Company's permanent life insurance portfolio consists of a straight whole life, a 20-payment whole life, and a whole life paid-up at age 65 product. The Company also offers "Guaranteed Golden" a guaranteed acceptance whole life product for consumers ages 50 to 80

that cannot be cancelled because of age, and "EstateWise", a single premium whole life ("SPWL") product.

The Company's agency operations are conducted on a general agency, branch office and a direct response basis. The Company primarily markets its products through community and regional banks and credit unions.

E. Reinsurance

As of December 31, 2011, the Company had reinsurance treaties in effect with two companies, one of which was authorized and the other accredited. The Company's life business is reinsured on a coinsurance and a yearly renewable term basis. Reinsurance is provided on an automatic basis.

The maximum retention limit for individual life contracts is \$300,000. The total face amount of life insurance ceded as of December 31, 2011, was \$92,524,076, which represents 65% of the total face amount of life insurance in force.

4. SIGNIFICANT OPERATING RESULTS

Indicated below is significant information concerning the operations of the Company during the period under examination as extracted from its filed annual statements. Failure of items to add to the totals shown in any table in this report is due to rounding.

The following table indicates the Company's financial growth (decline) during the period under review:

	December 31, <u>2008</u>	December 31, <u>2011</u>	Increase (Decrease)
Admitted assets	\$ <u>6,721,844</u>	\$ <u>6,460,371</u>	\$(<u>261,473</u>)
Liabilities	\$ <u>281,993</u>	\$ <u>472,201</u>	\$ <u>190,208</u>
Common capital stock	\$ 2,000,000	\$ 2,000,000	\$ 0
Gross paid in and contributed surplus	4,400,000	4,400,000	
Unassigned funds (surplus)	<u>39,851</u>	<u>(411,830)</u>	<u>(451,681)</u>
Total capital and surplus	\$ <u>6,439,851</u>	\$ <u>5,988,170</u>	\$(<u>451,681</u>)
Total liabilities, capital and surplus	\$ <u>6,721,844</u>	\$ <u>6,460,371</u>	\$(<u>261,473</u>)

The Company's invested assets as of December 31, 2011, were mainly comprised of bonds (93.5%), and cash and short-term investments (6.5%).

The Company's entire bond portfolio, as of December 31, 2011, was comprised of investment grade obligations.

The following is the net gain (loss) from operations by line of business after federal income taxes but before realized capital gains (losses) reported for each of the years under examination in the Company's filed annual statements:

	<u>2009</u>	<u>2010</u>	<u>2011</u>
Ordinary:			
Life insurance	<u>136,652</u>	<u>(31,082)</u>	<u>(360,494)</u>
Total ordinary	<u>\$136,652</u>	<u>\$(31,082)</u>	<u>\$(360,494)</u>
 Total	 <u>\$136,652</u>	 <u>\$(31,082)</u>	 <u>\$(360,494)</u>

The Company is in start-up mode and experienced losses during 2010 and 2011 due to the new business strain. This trend is expected to continue over the short-term as the Company increases operations in the state.

5. FINANCIAL STATEMENTS

The following statements show the assets, liabilities, capital and surplus as of December 31, 2011, as contained in the Company's 2011 filed annual statement, a condensed summary of operations and a reconciliation of the capital and surplus account for each of the years under review. The examiner's review of a sample of transactions did not reveal any differences which materially affected the Company's financial condition as presented in its financial statements contained in the December 31, 2011 filed annual statement.

A. Independent Accountant

The firm of PricewaterhouseCoopers, LLP was retained by the Company to audit the combined statutory basis statements of financial position of the Company as of December 31st of each year in the examination period, and the related statutory-basis statements of operations, capital and surplus, and cash flows for the year then ended.

PricewaterhouseCoopers, LLP concluded that the statutory financial statements presented fairly, in all material respects, the financial position of the Company at the respective audit dates. Balances reported in these audited financial statements were reconciled to the corresponding years' annual statements with no discrepancies noted.

B. Net Admitted Assets

Bonds	\$5,691,048
Cash, cash equivalents and short term investments	397,141
Investment income due and accrued	71,910
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	15,443
Deferred premiums, agents' balances and installments booked but deferred and not yet due	75,987
Current federal and foreign income tax recoverable and interest thereon	<u>208,842</u>
 Total admitted assets	 <u>\$6,460,371</u>

C. Liabilities, Capital and Surplus

Aggregate reserve for life policies and contracts	\$ 233,639
Premiums and annuity consideration for life and accident and health contracts received in advance	1,073
Contract liabilities not included elsewhere:	
Other amounts payable on reinsurance	8,479
Interest maintenance reserve	17,223
Commissions to agents due or accrued	49,288
General expenses due or accrued	19,309
Amounts withheld or retained by company as agent or trustee	777
Remittances and items not allocated	5,717
Miscellaneous liabilities:	
Asset valuation reserve	21,983
Payable to parent, subsidiaries and affiliates	<u>114,713</u>
 Total liabilities	 \$ <u>472,201</u>
 Common capital stock	 \$2,000,000
Gross paid in and contributed surplus	4,400,000
Unassigned funds (surplus)	(411,830)
Surplus	<u>3,988,170</u>
Total capital and surplus	<u>\$5,988,170</u>
 Total liabilities, capital and surplus	 <u>\$6,460,371</u>

D. Condensed Summary of Operations

	<u>2009</u>	<u>2010</u>	<u>2011</u>
Premiums and considerations	\$ 30,399	\$222,315	\$ 780,596
Investment income	433,026	396,926	351,258
Miscellaneous income	<u>50</u>	<u>20</u>	<u>0</u>
Total income	<u>\$463,475</u>	<u>\$619,261</u>	<u>\$1,131,854</u>
Benefit payments	\$ 0	\$ 0	\$ 35
Increase in reserves	2,408	32,965	198,266
Commissions	8,017	125,469	395,566
General expenses and taxes	253,768	442,532	939,857
Increase in loading on deferred and uncollected premiums	<u>13,482</u>	<u>64,229</u>	<u>112,466</u>
Total deductions	<u>\$277,675</u>	<u>\$ 665,195</u>	<u>\$ 1,646,190</u>
Net gain (loss)	\$185,800	\$ (45,934)	\$ (514,336)
Federal and foreign income taxes incurred	<u>49,148</u>	<u>(14,852)</u>	<u>\$ (153,842)</u>
Net income	<u>\$136,652</u>	<u>\$ (31,082)</u>	<u>\$ (360,494)</u>

E. Capital and Surplus Account

	<u>2009</u>	<u>2010</u>	<u>2011</u>
Capital and surplus, December 31, prior year	\$6,439,851	\$6,527,940	\$ 6,447,135
Net income	\$ 136,652	\$ (31,082)	\$ (360,494)
Change in net deferred income tax	(7,720)	21,387	(11,186)
Change in non-admitted assets and related items	(33,452)	(66,366)	(83,907)
Change in asset valuation reserve	<u>(7,391)</u>	<u>(4,744)</u>	<u>(3,378)</u>
Net change in capital and surplus for the year	<u>88,089</u>	<u>(80,805)</u>	<u>(458,965)</u>
Capital and surplus, December 31, current year	<u>\$6,527,940</u>	<u>\$6,447,135</u>	<u>\$5,988,170</u>

6. MARKET CONDUCT ACTIVITIES

The examiner reviewed various elements of the Company's market conduct activities affecting policyholders, claimants, and beneficiaries to determine compliance with applicable statutes and regulations and the operating rules of the Company.

A. Advertising and Sales Activities

The examiner reviewed a sample of the Company's advertising files and the sales activities of the agency force including trade practices, solicitation and the replacement of insurance policies.

Section 4228(f)(1)(A) of the New York Insurance Law states, in part:

“A company shall make annual information filings with respect to any newly-introduced plans or changes under which the company makes payments to agents if such plans are commission plans for which the commission percentages are, in all policy or contract years, no greater than the commission percentages set forth in paragraphs one, two, three and four of subsection (d) of this section, expense allowance plans other than those meeting the definition of a compensation arrangement, plans subject to the provisions of paragraph one of subsection (e) of this section under which compensation is not in excess of two percent of the fund annually in any of the first four policy or contract years, or plans subject to the provisions of paragraph four of subsection (e) of this section.”

A review of compensation payments made by the Company during the examination period revealed that the Company never filed schedules of agent compensation with the Department in accordance with Section 4228 of the New York Insurance Law.

The Company violated Section 4228(f)(1)(A) of the New York Insurance Law by paying agent compensation during the examination period according to schedules of agent compensation that were never filed with the Department.

Section 51.6(b)(4) of Department Regulation No. 60 states, in part:

“. . . (b) Where a replacement has occurred or is likely to occur, the insurer replacing the life insurance policy or annuity contract shall . . .

(4) Within ten days of receipt of the application furnish to the insurer whose coverage is being replaced a copy of any proposal, including the sales material used in the sale of the proposed life insurance policy or annuity contract, and the completed "Disclosure Statement . . .”

In 5 of the 15 (40%) replacements reviewed, the Company failed to provide to the insurers whose coverage was being replaced a copy of any proposal, including the sales material used in the sale of the proposed life insurance policy, and the completed Disclosure Statement, within 10 days of receipt of the application.

The Company violated Section 51.6(b)(4) of Department Regulation No. 60 by failing to provide to the insurer whose coverage was being replaced a copy of the sales material, proposal and Disclosure Statement used in the sale of the proposed life insurance policy within 10 days of receipt of the application.

Section 51.6(e) of Department Regulation No. 60 states:

“(e) Both the insurer whose life insurance policy or annuity contract is being replaced and the insurer replacing the life insurance policy or annuity contract shall establish and implement procedures to ensure compliance with the requirements of this Part. These procedures shall include a requirement that all material be dated upon receipt. Such insurers shall also designate a principal officer specifically responsible for the monitoring and enforcement of these procedures. All insurers covered under this Part shall furnish the Superintendent of Insurance with these procedures and the name and title of the designated principal officer by the effective date of this Part. Any changes in these procedures or the designated principal officer shall be furnished to the Superintendent of Insurance within thirty days of such change.”

In 7 of the 15 replacement files reviewed by the examiner, the replaced policy was solicited through direct mail solicitation. The Company’s Department Regulation No. 60 procedures that are on file with the Department do not include direct mail solicitation.

The Company violated Section 51.6(e) of the Department Regulation No. 60 by failing to file for approval the replacement procedures using direct mail solicitation.

B. Underwriting and Policy Forms

The examiner reviewed a sample of new underwriting files, both issued and declined, and the applicable policy forms.

Section 3209 of the New York Insurance Law states, in part:

“(b)(1) No policy of life insurance shall be delivered or issued for delivery in this state after the applicable effective date, as set forth in subsection (n) of this section, unless the prospective purchaser has been provided with the following:
(A) a copy of the most recent buyer's guide and the preliminary information

required by subsection (d) of this section, at or prior to the time an application is taken . . . and (B) a policy summary upon delivery of the policy. . . .

(e) A policy summary shall include the following . . .

(10) the date on which the policy summary is prepared.”

The Company was not able to provide any evidence that, during the period under examination, prospective applicants were provided with a copy of the preliminary information required by Section 3209(b) of the New York Insurance Law, at or prior to the time the application was taken.

The Company violated Section 3209(b)(1) of the New York Insurance Law by failing to provide the preliminary information to the policyholder at or prior to the time an application was taken.

The review of policy summaries provided to applicants upon delivery of their policy revealed that the policy summaries failed to include the date the policy summary was prepared.

The Company violated Section 3209(e)(10) of the New York Insurance Law by failing to include the date the policy summary was prepared on policy summaries provided to applicants upon delivery of their policy.

C. Treatment of Policyholders

The examiner reviewed a sample of various types of claims, surrenders, changes and lapses. The examiner also reviewed the various controls involved, checked the accuracy of the computations and traced the accounting data to the books of account.

Based upon the sample reviewed, no significant findings were noted.

7. INTERNAL AUDIT FUNCTION

The Company does not have an internal audit function. Internal audit is an integral part of corporate governance that includes the audit committee, the board of directors, senior management and the external auditors. In particular, internal auditors and audit committees are mutually supportive. Consideration of the work of internal auditors is essential for the audit committee to gain a complete understanding of the Company's operations. Internal audit identifies strategic, operational and financial risks facing the organization, and assesses controls put in place by management to mitigate those risks.

The examiner recommends that the Company establish and maintain an independent, adequately resourced, and competently staffed internal audit function to provide management with ongoing assessments of the Company's risk management processes and the accompanying system of internal controls. To the extent that audits performed by an affiliate on a functional basis are intended to encompass the activities of the Company, it should be clear from the audit workpapers that Company transactions or activities are specifically included in the samples reviewed by internal audit.

8. SUMMARY AND CONCLUSIONS

Following are the violations and recommendation contained in this report:

<u>Item</u>	<u>Description</u>	<u>Page No(s).</u>
A	The Company violated Section 4211(a) of the New York Insurance Law by failing to file its notices of election of directors for all three years under exam.	7
B	The Company violated Section 4228(f)(1)(A) of the New York Insurance Law by paying agent compensation during the examination period according to schedules of agent compensation that were never filed with the Department.	14
C	The Company violated Section 51.6(b)(4) of Department Regulation No. 60 by failing to provide to the insurer whose coverage was being replaced a copy of the sales material, proposal and Disclosure Statement used in the sale of the proposed life insurance policy within 10 days of receipt of the application.	15
D	The Company violated Section 51.6(e) of the Department Regulation No. 60 by failing to file for approval the replacement procedures using direct mail solicitation.	15
E	The Company violated Section 3209(b)(1) of the New York Insurance Law by failing to provide the preliminary information to the policyholder at or prior to the time an application was taken.	16
F	The Company violated Section 3209(e)(10) of the New York Insurance Law by failing to include the date the policy summary was prepared on policy summaries provided to applicants upon delivery of their policy.	16
G	The examiner recommends that the Company establish and maintain an independent, adequately resourced, and competently staffed internal audit function to provide management with ongoing assessments of the Company's risk management processes and the accompanying system of internal controls. To the extent that audits performed by an affiliate on a functional basis are intended to encompass the activities of the Company, it should be clear from the audit workpapers that Company transactions or activities are specifically included in the samples reviewed by internal audit.	17

Respectfully submitted,

Jo'Catena Hargrove
Senior Insurance Examiner

STATE OF NEW YORK)
)SS:
COUNTY OF NEW YORK)

Jo'Catena Hargrove, being duly sworn, deposes and says that the foregoing report, subscribed by her, is true to the best of her knowledge and belief.

Jo'Catena Hargrove

Subscribed and sworn to before me

this _____ day of _____

APPOINTMENT NO. 30824

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:

JO CATENA HARGROVE

as a proper person to examine the affairs of the

VANTISLIFE INSURANCE COMPANY OF NEW YORK

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

COMPANY

with such other information as she shall deem requisite.

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

this 30th day of March, 2012

BENJAMIN M. LAWSKY
Superintendent of Financial Services

By:



MICHAEL MAFFEI

ASSISTANT DEPUTY SUPERINTENDENT
AND CHIEF OF THE LIFE BUREAU

