REPORT ON EXAMINATION

OF THE

CLAVERACK COOPERATIVE INSURANCE COMPANY

AS OF

DECEMBER 31, 2012

DATE OF REPORT	DECEMBER 20, 2013
EXAMINER	SHEIK H. MOHAMED

TABLE OF CONTENTS

NEW YORK STATE
DEPARTMENT of
FINANCIAL SERVICES

Andrew M. Cuomo
Governor

Benjamin M. Lawsky
Superintendent

December 20, 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 31039 dated September 9, 2013, attached hereto, I have made an examination into the condition and affairs of Claverack Cooperative Insurance Company as of December 31, 2012, and submit the following report thereon.

Wherever the designation “the Company” appears herein without qualification, it should be understood to indicate Claverack Cooperative 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 271 Roxbury Road, Hudson, New York 12534.

Based on the significant underwriting losses experienced by the Company during the examination period, as well as its high operating expenses, which has resulted in a significant erosion of the Company’s surplus, the ability of the Company to continue as a going concern is questionable unless the Company takes action to address the causes of its surplus deterioration. Subsequent to the examination date, the Company took steps to terminate its defined benefit pension plan, which accounted for almost $1 million of the surplus deterioration during the examination period. This will partially address the causes of its surplus deterioration; however, the Company will still need to address its significant underwriting losses and high operating expenses.

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, 2008. This examination covered the four-year period from January 1, 2009 through December 31, 2012. 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
Pensions and insurance plans
Territory and plan of operation
Growth of Company
Loss experience
Reinsurance
Accounts and records
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

The Company was organized in 1857 to transact business as an assessment co-operative fire insurance company in the Town of Claverack, Columbia County, New York. In 1949, the territory was extended to include all of Columbia County. In 1957, a merger was effected between the Company and the Livingston Town Insurance Company, of Livingston, New York, the Claverack Town Fire Insurance Company being the surviving corporation.

The Department issued a certificate on February 8, 1971 authorizing the Company to change its name from The Claverack Town Fire Insurance Company to Claverack Cooperative Insurance Company.

Effective December 31, 2012, the Company merged with Farmers Town Mutual Insurance Company of Clinton ("Farmers"), with the Company being the surviving company. Upon the effective date of the Merger, the policyholders of Farmers received dividend payments totaling $650,000. As a result of the merger, the Company's surplus increased by $336,860, net of the dividend payments. The prior year columns in the Company's financial statements were restated to reflect the merger for comparability purposes.

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 nor more than fifteen members. The board met at least four times during each calendar year, thereby complying with Section 6624(b) of the New York Insurance Law. At December 31, 2012, the board of directors was comprised of the following ten members:

Name and Residence	Principal Business Affiliation
Katherine Buckley Hudson, NY	Assistant Secretary and Assistant Treasurer, Claverack Cooperative Insurance Company
Sidney Byron North East, NY	Secretary and Treasurer, Farmers Mutual Insurance Company of Milan, Pine Plains & Stanford
Victoria Cross Clinton Corners, NY	Secretary and Treasurer, Farmers' Town Mutual Insurance Company of Clinton
Elizabeth Dolan Greenport, NY	Teacher and Literacy Coach
Anna Enright Hyde Park, NY	Retired
Maureen Hess Claverack, NY	Secretary and Treasurer, Claverack Cooperative Insurance Company
Floyd Merrifield Jr. Claverack, NY	Retired
Kristin Plaia Claverack, NY	School Psychologist
Martin Schroeder Livingston, NY	Retired
Joan Simard Hillsdale, 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.

According to the Company's by-laws the compensation of officers shall be fixed by the board of directors. Examination review of the board minutes revealed that the board did not approve the Company's 2011 and 2012 Christmas bonuses.

It is recommended that the Company fully comply with its by-laws by approving the compensation of officers.

As of December 31, 2012, the principal officers of the Company were as follows:

Name	Title
Floyd Merrifield Jr.	President
Maureen Hess	Secretary and Treasurer
Elizabeth Dolan	Vice President
Katherine Buckley	Assistant Secretary and Assistant Treasurer

B. Territory and Plan of Operation

As of December 31, 2012, the Company was licensed to write business in all counties of the State of New York excluding the counties of New York, Kings, Queens, Bronx and Richmond.

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:

Paragraph	Line of Business
4	Fire
5	Miscellaneous property
6	Water damage
7	Burglary and theft
8	Glass
12	Collision
13	Personal injury liability
14	Property damage liability
15	Workers’ compensation and employers’ liability
19	Motor vehicle and aircraft physical damage
20	Marine and inland marine

The Company is also licensed to accept and cede reinsurance as provided in Section 6606 of the New York Insurance Law.

Based on the lines of business for which the Company is licensed and pursuant to the requirements of Articles 13, 41 and 66 of the New York Insurance Law, the Company is required to maintain a minimum surplus to policyholders in the amount of $100,000.

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

Calendar Year	Direct Premiums Written
2009	$1,780,620
2010	$1,746,618
2011	$1,827,049
2012	$1,915,329

The Company writes predominantly commercial multiple peril, homeowners multiple peril, and farmowners multiple peril policies, which accounted for 47.3%, 40.3% and 9.3%, respectively, of the 2012 direct premiums written. The business is produced through approximately 117 independent agents and brokers.

C. Reinsurance

During the period under examination the Company did not assume any reinsurance business.

As of the examination date, the Company had the following reinsurance program in place:

Type of treaty	Cession
Multiline excess of loss	
Property	1st layer: $120,000 in excess of $30,000 ultimate net loss, each loss, each risk, subject to a limit of liability of $360,000 each loss occurrence.
	2nd layer: $350,000 in excess of $150,000 ultimate net loss, each loss, each risk, subject to a limit of liability of $700,000 each loss occurrence.
	3rd layer: $500,000 in excess of $500,000 ultimate net loss, each loss, each risk, subject to a limit of liability of $500,000 each loss occurrence.
Casualty	1st layer: $130,000 in excess of $20,000 ultimate net loss, each loss occurrence.
	2nd layer: $350,000 in excess of $150,000 ultimate net loss each loss occurrence.
	3rd layer: $500,000 in excess of $500,000 ultimate net loss, each loss occurrence.
Casualty and Property combined	$20,000 in excess of $30,000 each loss occurrence.

Type of treaty	Cession
Casualty Clash Excess of Loss	$1 million in excess of $1 million ultimate net loss, each loss occurrence.
Property Catastrophe Excess of Loss (3 layers)	
First Layer	$900,000 in excess of $100,000 ultimate net loss, each loss occurrence.
Second Layer	$1 million in excess of $1 million ultimate net loss, each loss occurrence.
Third Layer	100% in excess of $2 million ultimate net loss, each loss occurrence.
Property Pro Rata Facultative	Risks where a total cession value exceeds $400,000 underwritten on an offer and accept basis.
Casualty Excess of Loss Facultative Reinsurance	$1 million in excess of $1 million each loss occurrence, each policy.

All of the above cessions were to authorized or accredited reinsurers.

All ceded reinsurance agreements in effect as of the examination date were reviewed and found to contain the required clauses, including an insolvency clause meeting the requirements of Section 1308 of the New York Insurance Law.

Examination review found that the Schedule F data reported by the Company in its filed 2012 annual statement did not accurately reflect its reinsurance transactions. In particular, the Company was unable to support the majority of amounts recoverable from reinsurers reported in Schedule F – Part 3.

It is recommended that the Company comply with the NAIC Annual Statement Instructions by completing Schedule F – Part 3 correctly in all future filings with this Department. A similar recommendation was included in the previous report on examination.

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 Secretary/Treasurer and Assistant Secretary/Assistant Treasurer. 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.

During the period covered by this examination, the Company did not commute any reinsurance agreements.

D. Holding Company System

As of December 31, 2012, the Company was not a member of any holding company system.

E. Significant Operating Ratios

The following ratios have been computed as of December 31, 2012, based upon the results of this examination:

Net premiums written to policyholders' surplus	188%
Adjusted liabilities to liquid assets	94%
Gross agents' balances (in collection) to policyholders' surplus	3%

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 four-year period covered by this examination:

	Amounts	Ratios
Losses and loss adjustment expenses incurred	$4,282,114	101.20%
Other underwriting expenses incurred	1,918,610	45.34
Net underwriting loss	(1,969,313)	(46.54)
Premiums earned	$4,231,411	100.00%

Management Expense Ratio

In calendar year 2012, the ratio of the Company's management expenses to its net premiums written was 45%. Section 6613(a) of the New York Insurance Law states, in part:

> The expenses of management of any co-operative property/casualty insurance company shall not exceed in any one calendar year 42.5% of its net premiums written for such year…

It is recommended that the Company endeavor to reduce its management expenses to less than 42.5% of its net premiums written pursuant to the provisions of Section 6613(a) of the New York Insurance Law. It is noted that a similar recommendation was included in the prior report on examination.

F. Accounts and Records

i. Preparation of annual statement

During the examination the examiners found several errors in the preparation of the 2012 annual statement. Specifically, the following were noted:

- Schedule D - Part 2 - Section 2, two errors were found when examiner matched the 2012 trade tickets to the annual statement: a) The annual statement shows that the Company owns 350 shares of Aflac common stocks. The trade ticket and bank confirmation shows 450 shares; b) The date acquired for Pepsico Inc. share also was incorrect. The Company reported May 12, 2012 instead of May 16, 2012.

- Underwriting and Investment Exhibit - Part 1B - Premiums Written - the Company reported ceded premiums under reinsurance ceded to affiliates instead of non-affiliates.

- Jurat page - As of December 31, 2012, the Company had ten directors but they only listed nine on the jurat page.

- Supplemental Compensation Exhibit - The Company continues to list a salary associated with the title Chief Executive Officer ("CEO"), yet the Jurat page does not indicate anyone holding the title of CEO.

It is recommended that the Company exercise greater care in the preparation of its annual statement in all future filings with this Department.

ii. <u>Classification of annual statement lines</u>

Examination review of the Company's 2012 Underwriting & Expense Exhibit (Part 3 - Expenses) in accordance with the NAIC Annual Statement instructions revealed that several expenses were misclassified, as follows:

- Expenses that should have been classified as "Employee Relations and Welfare" were classified as "Advertising" or "Miscellaneous"
- Expenses that should have been classified as "Travel and Travel Items were classified as "Advertising".

Additionally, the review of the accounts that comprise Page 3, Line 5 - Other Expenses (excluding taxes, licenses, and fees) in the Company's filed 2012 annual statement showed that the Company incorrectly included payroll tax withholdings. In accordance with the NAIC Annual Statement instructions, employees' withholdings should be included on Page 3, Line 14 - Amounts withheld or retained by company for account of others.

It is recommended that the Company classify accounts correctly in accordance with the NAIC Annual Statement instructions in all future financial statements filed with the Department. It is noted that a similar recommendation was included in the prior report on examination.

iii. <u>Late Filing</u>

It was noted that the Company's 2011 and 2012 Management's Discussion and Analysis ("MD&A") were not received by the Department until May 16, 2012 and April 17, 2013, respectively. Pursuant to the NAIC Annual Statement Instructions, the MD&A is due on April 1 of each year. Additionally, the Company's quarterly statement as of March 31, 2013 was not received by the Department until July 1, 2013. Pursuant to the NAIC Annual Statement Instructions, the March 31 quarterly statement is due on May 15 of each year.

It is recommended that the Company file its financial statements and supplements in a timely manner pursuant to the NAIC Annual Statement Instructions.

3. FINANCIAL STATEMENTS

A. Balance Sheet

The following shows the assets, liabilities and surplus as regards policyholders as of December 31, 2012 as determined by this examination and as reported by the Company:

Assets	Assets	Examination Assets Not Admitted	Net Admitted Assets	Company Net Admitted Assets	Surplus Increase (Decrease)
Bonds	$1,353,806	$ 0	$1,353,806	$1,353,806	$ 0
Preferred stocks	131,363	0	131,363	131,363	0
Common stocks	380,557	0	380,557	380,557	0
Cash, cash equivalents and short-term investments	1,643,510	0	1,643,510	1,643,510	0
Investment income due and accrued	10,208	0	10,208	10,208	0
Uncollected premiums and agents' balances in the course of collection	27,691	9,236	18,455	18,455	0
Deferred premiums, agents' balances and installments booked but deferred and not yet due	270,628	0	270,628	270,628	0
Amounts recoverable from reinsurers	224,669	162,441	62,228	224,669	(162,441)
Current federal and foreign income tax recoverable and interest thereon	37,685	0	37,685	37,685	0
Net deferred tax asset	323,309	323,309	0	0	0
Electronic data processing equipment and software	5,533	0	5,533	5,533	0
Prepaid assets	3,308	3,308	0	0	0
Totals assets	$4,412,267	$498,294	$3,913,973	$4,076,414	$(162,441)

Liabilities, surplus and other funds

	Examination	Company	Surplus Increase (Decrease)
Losses and loss adjustment expenses	$ 624,110	$ 624,110	$ 0
Commissions payable, contingent commissions and other similar charges	82,340	64,818	(17,522)
Other expenses (excluding taxes, licenses and fees)	12,039	12,039	0
Taxes, licenses and fees (excluding federal and foreign income taxes)	688	688	0
Unearned premiums	1,000,981	1,000,981	0
Advance premium	39,914	39,914	0
Policyholders (dividends declared and unpaid)	650,000	650,000	0
Ceded reinsurance premiums payable (net of ceding commissions)	158,577	158,577	0
Remittances and items not allocated	14,472	14,472	0
Provision for reinsurance	4,261	42,398	38,137
Pension liabilities	731,497	731,497	0
Total liabilities	$3,318,879	$3,339,494	$ 20,615
Minimum required surplus	$ 100,000	$ 100,000	$
Unassigned funds (surplus)	495,094	636,920	(141,826)
Surplus as regards policyholders	$ 595,094	$ 736,920	$(141,826)
Total liabilities, surplus and other funds	$3,913,973	$4,076,414	$(162,441)

Note: The Internal Revenue Service did not audit the Company's federal income tax returns for the years under examination. Audits covering subsequent years have yet to commence. 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 decreased $1,439,368 during the four-year examination period January 1, 2009 through December 31, 2012, detailed as follows:

Underwriting Income		
Premiums earned		$4,231,411
Deductions:		
Losses and loss adjustment expenses incurred	$4,282,114	
Other underwriting expenses incurred	1,936,132	
Total underwriting deductions		6,218,246
Net underwriting gain or (loss)		$(1,986,835)
Investment Income		
Net investment income earned	$ 259,765	
Net realized capital gain	(3,440)	
Net investment gain or (loss)		256,325
Other Income		
Net gain or (loss) from agents' or premium balances charged off	$ 2,236	
Finance and service charges not included in premiums	220,572	
Settlement	47,634	
Ceded UPR transfer	425,644	
Total other income		696,086
Net income before dividends to policyholders and before federal and foreign income taxes		$(1,034,424)
Dividends to policyholders		(650,000)
Net income after dividends to policyholders but before federal and foreign income taxes		$(1,684,424)
Federal and foreign income taxes incurred		(78,677)
Net Income		$(1,605,747)

	Gains in Surplus	Losses in Surplus	
Surplus as regards policyholders per report on examination as of December 31, 2008			$ 2,034,462
Net income		$1,605,747	
Net unrealized capital gains or (losses)	$ 43,353		
Change in net deferred income tax	186,186		
Change in nonadmitted assets		406,877	
Change in provision for reinsurance		4,261	
Surplus adjustment due to merger	986,860		
Change in minimum pension accrual		387,427	
Error correction in unpaid reinsurance ceded	0	251,456	
Gains / Losses in Surplus	$1,216,399	$2,655,767	
Net increase (decrease) in surplus			$(1,439,368)
Surplus as regards policyholders per report on examination as of December 31, 2012			$ 595,094

4. LOSSES AND LOSS ADJUSTMENT EXPENSES

The examination liability for the captioned items of $624,110 is the same as reported by the Company as of December 31, 2012. 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. AMOUNTS RECOVERABLE FROM REINSURERS

The examination admitted asset for the captioned item of $62,228 is $162,441 less than the $224,669 reported by the Company as of December 31, 2012.

The examination adjustment to this item represents amounts reported by the Company as recoverable from reinsurers, for which it could not provide substantiation. It is noted that the Company wrote off $124,832 of uncollected reinsurance recoverable in its quarterly statement as of June 30, 2013. Additionally, it is noted that there is a corresponding adjustment to the liability “Provision for reinsurance”, which partially offsets the reduction to this asset. See item 7 in this report.

6. COMMISSIONS PAYABLE, CONTINGENT COMMISSIONS AND OTHER SIMILAR CHARGES

The examination liability for the captioned item of $83,340 is $17,522 more than the $64,818 reported by the Company as of December 31, 2012.

The examination change represents contingency commissions earned by two of the Company's agents in 2012 and paid by the Company in 2013, for which the Company failed to establish a liability.

It is recommended that the Company establish a liability for all expenses incurred by it as of the statement date.

7. PROVISION FOR REINSURANCE

The examination liability for the captioned item of $4,261 is $38,137 less than the $42,398 reported by the Company as of December 31, 2012.

The examination adjustment represents the elimination of the reinsurance penalty on reinsurance recoverable balances that were not admitted by this examination, as more fully explained in item 5 of this report.

8. CONCLUSION

Based on the significant underwriting losses experienced by the Company during the examination period, as well as its high operating expenses, which has resulted in a significant erosion of the Company's surplus, the ability of the Company to continue as a going concern is questionable unless the Company takes action to address the causes of its surplus deterioration. Subsequent to the examination date, the Company took steps to terminate its defined benefit pension plan, which accounted for almost $1 million of the surplus deterioration during the examination period. This will partially address the causes of its surplus deterioration; however, the Company will still need to address its significant underwriting losses and high operating expenses.

9. COMPLIANCE WITH PRIOR REPORT ON EXAMINATION

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

ITEM		PAGE NO.
A	Reinsurance It was recommended that the Company comply with the NAIC Annual Statement instructions by completing Schedule F – Part 3 correctly in all future filings with the Department.	7
	The Company has not complied with this recommendation. A similar comment is made in this report.	
B	Management Expense Ratio It was recommended that the Company comply with Section 6613(a) of the New York Insurance Law and make efforts to bring its management expenses to within the limits allowed by this specific section.	8
	The Company has not complied with this recommendation. A similar comment is made in this report.	
C	Accounts and Records	
i.	It was recommended that securities transactions be recorded in the annual statement on the trade date in accordance with SSAP No. 26, SSAP No. 30 and SSAP No. 32.	9
	The Company has complied with this recommendation.	
ii.	It was recommended that the Company classify accounts correctly in accordance with the NAIC Annual Statement instructions in all future financial statements filed with the Department.	9
	The Company has not complied with this recommendation. A similar comment is made in this report.	
iii.	It was recommended that the Company comply with Section 1409(a) of the New York Insurance Law and limit its investment in any one institution to 10% of its admitted assets.	9
	The Company has complied with this recommendation.	

10. SUMMARY OF COMMENTS AND RECOMMENDATIONS

ITEM		PAGE NO.
A.	Surplus Deterioration Based on the significant underwriting losses experienced by the Company during the examination period, as well as its high operating expenses, which has resulted in a significant erosion of the Company's surplus, the ability of the Company to continue as a going concern is questionable unless the Company takes action to address the causes of its surplus deterioration. Subsequent to the examination date, the Company took steps to terminate its defined benefit pension plan, which accounted for almost $1 million of the surplus deterioration during the examination period. This will partially address the causes of its surplus deterioration; however, the Company will still need to address its significant underwriting losses and high operating expenses.	1, 15
B.	Management It is recommended that the Company comply with its by-laws by approving the compensation of officers.	4
C.	Reinsurance It is recommended that the Company comply with the NAIC Annual Statement Instructions by completing Schedule F - Part 3 correctly in all future filings with this Department. A similar recommendation was included in the prior report on examination.	6
D.	Management Expense Ratio It is recommended that the Company comply with Section 6613(a) of the New York Insurance Law and make efforts to bring its management expenses to within the limits allowed by this specific section. It is noted that a similar recommendation was included in the prior report on examination.	9
E.	Accounts and Records	
i.	It is recommended that the Company exercise more care in all future filings with this Department.	9
ii.	It is recommended that the Company classify accounts correctly in accordance with the NAIC Annual Statement instructions in all future financial statements filed with the Department. It is noted that a similar recommendation was included in the prior report on examination.	10
iii.	It is recommended that the Company ensure that timely filing of all quarterly statements and MD&A be made in accordance with NAIC Annual Statement Instructions.	10
F.	Commissions Payable and Contingent Commissions It is recommended that the Company establish a liability for all expenses incurred by it as of the statement date.	15

Respectfully submitted,

______________/s/______________
Sheik H. Mohamed, CPCU
Senior Insurance Examiner

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

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

______________/s/______________
Sheik H. Mohamed

Subscribed and sworn to before me

this__________ day of ___________________, 2014.

APPOINTMENT NO. ***31039***

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:*

Sheik Mohamed

as a proper person to examine the affairs of the

Claverack Cooperative 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 September, 2013

BENJAMIN M. LAWSKY
Superintendent of Financial Services

By:

Jean Marie Cho
Deputy Superintendent