REPORT ON EXAMINATION

OF

MID-HUDSON CO-OPERATIVE INSURANCE COMPANY

AS OF

DECEMBER 31, 2018

DATE OF REPORT	DECEMBER 14, 2020
EXAMINER	DILBRINA BELGRAVE, AFE, CISA

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December 14, 2020

Honorable Linda A. Lacewell
Superintendent
New York State Department of Financial Services
Albany, New York 12257

Madam:

Pursuant to the requirements of the New York Insurance Law, and in compliance with the instructions contained in Appointment Number 31946 dated April 30, 2019, attached hereto, I have made an examination into the condition and affairs of Mid-Hudson Co-operative Insurance Company as of December 31, 2018, and submit the following report thereon.

Wherever the designation "the Company" or "MHCIC" appears herein without qualification, it should be understood to indicate Mid-Hudson Co-operative 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 104 Bracken Road, Montgomery, New York 12549.

1. SCOPE OF EXAMINATION

The Department has performed an examination of the Mid-Hudson Co-operative Insurance Company, a single-state insurer. The previous examination was conducted as of December 31, 2014. This examination covered the four-year period from January 1, 2015 through December 31, 2018. Transactions occurring subsequent to this period were reviewed when deemed appropriate by the examiner.

The examination of the Company was performed concurrently with the examinations of the following insurers: Claverack Cooperative Insurance Company ("CCIC") and Midrox Insurance Company ("MIC").

This examination was conducted in accordance with the National Association of Insurance Commissioners ("NAIC") Financial Condition Examiners Handbook, which requires that we plan and perform the examination to evaluate the financial condition and identify current and 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 New York laws, statutory accounting principles, and annual statement instructions.

This examination report includes, but is not limited to, the following:

Company history
Management and control
Territory and plan of operation
Reinsurance
Affiliated group
Financial statement presentation
Loss review and analysis
Market Conduct
Significant subsequent events
Summary of recommendations

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 incorporated as an assessment cooperative on April 19, 1900 under the laws of the State of New York as The Westchester and Putnam Patrons' Fire Relief Association. It commenced business on September 1st of the same year. On November 10, 1965, the Company changed its name to its current title.

Effective April 2, 2015, the Company and CCIC entered into an affiliation agreement.

Effective March 31, 2017, the Company converted from an assessment cooperative to an advance premium cooperative property/casualty company.

As of November 2017, Statewide Underwriter Agency, Inc. became a wholly owned subsidiary of the Company.

A. Corporate Governance

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 seven nor more than 15 members. The board met at least four times during each calendar year, in compliance with Section 6624(b) of the New York Insurance Law. At December 31, 2018, the board of directors was comprised of the following ten members:

Name and Residence	Principal Business Affiliation
Marc A. Baez[1] Liberty, NY	Chief Executive Officer and President, The Sullivan County Partnership for Economic Development President, Baez Associates
Catherine C. Bender[2] Grahamsville, NY	Partner, Coombe, Bender & Company, LLC
Katherine M. Buckley[1] Valatie, NY	Director, Claverack Cooperative Insurance Company
Greg M. Cooper[2] Montgomery, NY	Vice President, Mid-Hudson Co-operative Insurance Company
Raymond J. Enright[1] Stanfordville, NY	Director, Claverack Cooperative Insurance Company

Name and Residence	Principal Business Affiliation
Edward N. Harper[2] Niskayuna, NY	President, Mid-Hudson Co-operative Insurance Company
Maureen M. Hess[1] Hudson, NY	Director, Mid-Hudson Co-operative Insurance Company
Alan R. Lewis[1] Newburgh, NY	Principal, Alan R. Lewis, Esq. Law Firm
Fred J. Morse[2] Margaretville, NY	President, Midrox Insurance Company
Gary C. Schmidt[2] Monticello, NY	Secretary and Treasurer, Mid-Hudson Co-operative Insurance Company

[1] Also serves as a director on CCIC's board of directors
[2] Also serves as a director on both CCIC and MIC's board of directors

A review of the Company's charters for its committees noted the following:

- The audit committee charter states that "the committee shall meet no fewer than two times per year …and shall maintain minutes of all meetings . . ."
- The investment committee charter states that "the committee shall meet no fewer than three times per year . . . and shall maintain minutes of all meetings".

Based on the review of the committee meeting minutes, it was noted that the Company held the required number of audit committee meetings pursuant to its audit committee charter in 2016 only. Additionally, for all years under review, the investment committee did not hold the required number of meetings pursuant to its investment committee charter.

It is recommended that the Company comply with its committee charters by holding all required meetings pursuant to such charter.

Part 89.12(e) of Department Regulation No. 118 states:

> "The Company shall provide written notification to the superintendent of the selection of its audit committee within 30 days of the effective date of this Part and within 30 days of any change in membership of the audit committee. The notice shall include a description of the reason for the change".

Based on a review of audit committee membership, there were changes to audit committee memberships for all years under review. However, the Company neglected to notify the Department of changes in membership to the audit committee.

It is recommended that the Company ensure compliance with Department Regulation No. 118 by notifying the superintendent of all changes in audit committee membership within 30 days.

Section 312(b) of the New York Insurance Law states, in part:

> "A copy of the report shall be furnished by such insurer or other person to each member of its board of directors and each such member shall sign a statement which shall be retained in the insurer's files confirming that such member has received and read such report . . ."

Based on the examiner's review, it appears that the Company neglected to retain in its files, statements confirming that the board of directors received and read the prior report on examination.

It is recommended that the Company comply with the provisions of Section 312(b) of the New York Insurance Law and provide a copy of the report on examination to each member of its board of directors, and maintain a statement signed by each board member indicating that he/she has received and read the report.

As of December 31, 2018, the principal officers of the Company were as follows:

Name	Title
Edward N. Harper[3]	President
Gary C. Schmidt[4]	Secretary and Treasurer
Greg M. Cooper[3]	Vice President

[3] Also a principal officer of both CCIC and MIC
[4] Also a principal officer of CCIC

B. Territory and Plan of Operation

As of December 31, 2018, the Company was licensed to write business solely in New York State.

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
9	Boiler and machinery
12	Collision
13	Personal injury liability
14	Property damage liability
15	Workers' compensation and employers' liability (excluding workers' compensation)
19	Motor vehicle and aircraft physical damage (excluding aircraft physical damage)
20	Marine and inland marine (inland marine only)

The Company is also authorized to accept and cede reinsurance as provided in Section 6606(a)(1) 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 $1,150,000.

The following schedule shows the direct and assumed premiums written by the Company for the period under examination:

Calendar Year	Direct Premiums	Assumed Premiums	Total Gross Premiums
2015	$11,285,104	$ 1,907,547	$13,192,651
2016	$13,759,103	$ 2,817,544	$16,576,647
2017	$14,842,523	$ 2,952,449	$17,794,972
2018	$16,476,283	$10,913,372	$27,389,655

The Company writes predominantly commercial multiple peril, homeowners multiple peril, and fire policies, which accounted for 57.4%, 22% and 9.2%, respectively, of the 2018 direct premiums written. The business is produced through approximately 300 independent agents and brokers.

The Company assumes business from CCIC and MIC. Effective April 1, 2015, the Company entered into a quota share reinsurance agreement with CCIC. The quota share agreement was renewed on January 1, 2016, wherein the Company assumes 100% of CCIC's writings. Additionally, effective January 1, 2018, the Company entered into a quota share reinsurance agreement with MIC, wherein the Company assumes 100% of MIC's writings. These agreements were approved by the Department.

C. Reinsurance Ceded

The Company has structured its reinsurance program as follows:

Type of Treaty	Cession
Property Excess of Loss (2 layers)	\$800,000 in excess of \$200,000 ultimate net loss subject to a \$2,400,000 each occurrence limit.
Casualty Excess of Loss (3 layers)	\$2,800,000 in excess of \$200,000 ultimate net loss subject to a \$4,000,000 each occurrence limit for the third layer.
Section C – Combined Property and Casualty	\$200,000 in excess of \$200,000 ultimate net loss in any one combined occurrence.
Property Catastrophe (4 layers)	\$24,500,000 in excess of \$500,000 each loss occurrence subject to a \$49,000,000 all loss occurrence limit.
Property Facultative (2 layers)	\$4,000,000 in excess of \$1,000,000 ultimate net loss subject to a \$3,000,000 limit in any one loss occurrence for layer A.
Boiler & Machinery	100% quota share.

The Company cedes its business to authorized reinsurers. All significant 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 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 the NAIC Accounting Practices and Procedures Manual, Statement of Statutory Accounting Principles (“SSAP”) No. 62R. Representations were supported by an attestation from the Company's President and Vice President. 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. <u>Affiliated Group</u>

Effective April 2, 2015, the Company entered into an affiliation agreement with CCIC, whereby the companies operate under a common management team and board of directors. This agreement was approved by the Department.

Referenced in the affiliation agreement with CCIC is the quota share agreement, described in section 2B of this report, and an expense sharing agreement. Per the terms of the expense sharing agreement, effective April 2, 2015, the Company and CCIC share certain insurance business related costs. All expenses incurred by one company on behalf of the other are allocated between the companies in accordance with Department Regulation No. 30. This agreement was approved by the Department.

As of February 2016, the Company had controlling interest in Statewide Underwriters Agency, Inc. ("Statewide", formerly known as Midrox Agency Inc.). In November 2017, the Company purchased the remaining minority interest, making Statewide a direct, wholly-owned subsidiary.

<u>Correct Reporting of Subsidiary Investments</u>

The Company reported ownership of 6,800 shares of Statewide as an unaffiliated entity in its Schedule D–Part 2–Section 2 of its 2017 and 2018 filed annual statements. Upon examination, it was determined that the Company actually wholly-owns Statewide. It is recommended that the Company correctly complete its investment schedules in its filed annual statements with information pertaining to its subsidiary, Statewide

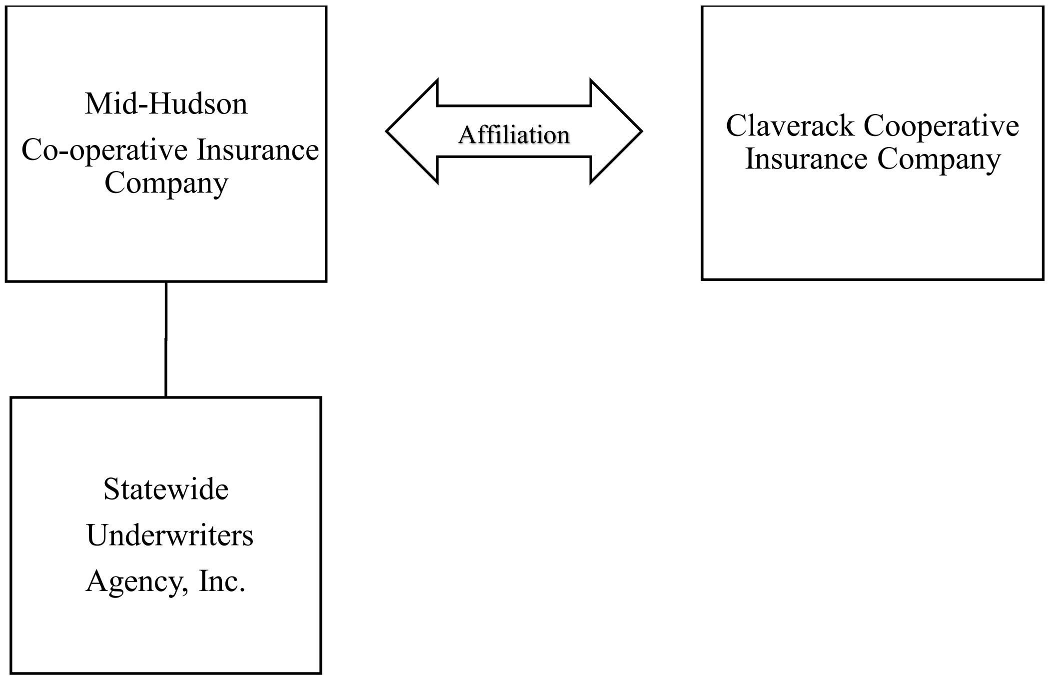
<u>Tax Allocation Agreement</u>

Effective November 16, 2016, the Company entered into a tax allocation agreement with its wholly owned subsidiary, Statewide, to file consolidated federal income tax returns. Examination review of the agreement revealed that it is consistent with the guidelines contained in Department Circular Letter No. 33 (1979).

All agreements subject to Section 1505 of the New York Insurance Law were filed and non-disapproved accordingly.

A review of the holding company registration statements filed with this Department indicated that such filings were complete and were filed in a timely manner pursuant to Department Circular Letter 10 (2010).

The following is an unabridged chart of the affiliate group at December 31, 2018.



E. Significant Ratios

The Company's operating ratios, computed as of December 31, 2018, fell within the benchmark ranges set forth in the Insurance Regulatory Information System of the NAIC.

Operating Ratios	Result
Net premiums written to policyholders' surplus	236%
Adjusted liabilities to liquid assets	72%

Taking into account the financial adjustment noted in sections 3D, 3E and 4 of this report, the Company's two-year overall operating ratio of 101% is slightly above the benchmark range.

Underwriting Ratios

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

	Amounts	Ratio
Losses and loss adjustment expenses incurred	$30,744,815	60.52%
Other underwriting expenses incurred	23,080,574	45.44
Net underwriting gain (loss)	(3,026,870)	(5.96)
Premiums earned	$50,798,519	100.00%

The Company's reported risk-based capital ("RBC") score was 437.3% at December 31, 2018. The RBC is a measure of the minimum amount of capital appropriate for a reporting entity to support its overall business operations in consideration of its size and risk profile. There was a financial adjustment in this report (refer to sections 3D, 3E, and 4) that impacted the Company's RBC score. The adjusted RBC score due to the financial adjustment is 331.1% at December 31, 2018. An RBC of 200% or below can result in regulatory action.

F. Accounts and Records

Preparation of annual statement

During the examination, the examiners found several errors in the preparation of the 2018 annual statement. Specifically, the following were noted:

- Underwriting and Investment Exhibit - Part 1B - Premiums Written - the Company reported all assumed premiums from non-affiliates. A portion of the assumed premium is from the Company's affiliated entity, CCIC.
- The Company improperly reported its investment in its subsidiary, Statewide, as unaffiliated in Schedule D - Part 2 – Section 2.
- The Company did not properly disclose ownership of Statewide in the Notes to the Financial Statements.
- The Company did not include Statewide in its Schedule Y – Part 1 organizational chart.
- The Company neglected to disclose its investment advisor in interrogatory #28.05 of the General Interrogatories – Part 1.

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

3. FINANCIAL STATEMENTS

A. Balance Sheet

The following shows the assets, liabilities and surplus as regards policyholders as of December 31, 2018, as reported by the Company:

Assets	Assets	Assets Not Admitted	Net Admitted Assets
Bonds	$16,070,163	$ 0	$16,070,163
Common stocks	6,036,161	11,250	6,024,911
Properties occupied by the company	202,646	0	202,646
Cash, cash equivalents and short-term investments	3,797,111	0	3,797,111
Investment income due and accrued	123,553	0	123,553
Uncollected premiums and agents' balances in the course of collection	130,955	14,086	116,869
Deferred premiums, agents' balances and installments booked but deferred and not yet due	3,825,895	0	3,825,895
Amounts recoverable from reinsurers	216,597	0	216,597
Current federal and foreign income tax recoverable and interest thereon	9,600	0	9,600
Net deferred tax asset	83,600	0	83,600
Electronic data processing equipment and software	1,653,616	1,653,616	0
Furniture and equipment, including health care delivery assets	83,468	83,468	0
Receivables from parent, subsidiaries and affiliates	1,346,346	0	1,346,346
Aggregate write-ins for other than invested assets	1,392	1,392	0
Total assets	$33,581,102*	$1,763,812	$31,817,290*

*Rounding difference of $1

Liabilities, surplus and other funds

Liabilities		
Losses and Loss Adjustment Expenses		$ 6,125,749
Reinsurance payable on paid losses and loss adjustment expenses		368,507
Commissions payable, contingent commissions and other similar charges		1,204,657
Other expenses (excluding taxes, licenses and fees)		352,850
Taxes, licenses and fees (excluding federal and foreign income taxes)		38,131
Unearned premiums		12,601,428
Advance premium		157,100
Ceded reinsurance premiums payable (net of ceding commissions)		126,208
Remittances and items not allocated		1,423
Aggregate write-ins for liabilities		21,970
Total liabilities		$20,998,023
Surplus and other funds		
Aggregate write-ins for special surplus funds	$1,150,000	
Unassigned funds (surplus)	9,669,267	
Surplus as regards policyholders		10,819,267
Total liabilities, surplus and other funds		$31,817,290

Note: The Internal Revenue Service has not audited tax returns covering tax years 2015 through 2018. 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

Net income for the examination period as reported by the Company was $164,591, as detailed below:

Underwriting Income		
Premiums earned		$50,798,519
Deductions:		
Losses and loss adjustment expenses incurred	$29,222,815	
Other underwriting expenses incurred	23,080,574	
Total underwriting deductions		52,303,389
Net underwriting gain or (loss)		$(1,504,870)
Investment Income		
Net investment income earned	$ 998,529	
Net realized capital gain	672,534	
Net investment gain or (loss)		1,671,063
Other Income		
Net gain or (loss) from agents' or premium balances charged off	$ (154,322)	
Finance and service charges not included in premiums	614,328	
Aggregate write-ins for miscellaneous income	(11,637)	
Total other income		448,369
Net income before federal and foreign income taxes		614,562
Federal and foreign income taxes incurred		449,971
Net income		$ 164,591

C. Capital and Surplus

Surplus as regards policyholders decreased $580,806 during the four-year examination period January 1, 2015 through December 31, 2018, as reported by the Company, detailed as follows:

	Gains in Surplus	Losses in Surplus	
Surplus as regards policyholders as reported by the Company as of December 31, 2014			$11,400,073
Net income	$164,591	$ 0	
Net unrealized capital gains or (losses)	493,253	0	
Change in net deferred income tax	258,289	0	
Change in non-admitted assets	0	1,496,577	
Aggregate write-ins for gains and losses in surplus	0	362	
Total gains and losses	$916,133	$1,496,939	
Net increase (decrease) in surplus			(580,806)
Surplus as regards policyholders as reported by the Company as of December 31, 2018			$10,819,267

D. Analysis of Changes to Surplus

	Surplus Increase	Surplus Decrease	
Surplus as regards policyholders as of December 31, 2018, as reported by the Company			$10,819,267
Examination change in loss and loss adjustment expense reserves		$1,522,000	
Net increase (or decrease) in surplus			(1,522,000)
Surplus as regards policyholders as of December 31, 2018, per report on examination			$9,297,267

E. Analysis of Changes to Income

	Income Increase	Income Decrease	
Net income for the examination period, as reported by the Company			$ 164,591
Examination change in loss and loss adjustment expense reserves		$1,522,000	
Net increase (decrease) in income			(1,522,000)
Net income (loss) for the examination period, after examination adjustments			$(1,357,409)

4. LOSSES AND LOSS ADJUSTMENT EXPENSES

The examination liability for the captioned items of $7,647,749 is $1,522,000 more than the $6,125,749 reported by the Company in its December 31, 2018 filed annual statement. The examination analysis of the loss and loss adjustment expense reserves was conducted in accordance with generally accepted actuarial principles and statutory accounting principles, including SSAP No. 55.

Section 1303 of the New York Insurance Law states, in part:

> "Every insurer shall . . . maintain reserves in an amount estimated in the aggregate to provide for the payment of all losses or claims incurred on or prior to the date of statement, whether reported or unreported, which are unpaid as of such date and for which such insurer may be liable, and also reserves in an amount estimated to provide for the expenses of adjustment or settlement of such losses or claims."

Further, Paragraph 10 of SSAP No. 55 states, in part:

> "The liability for claim reserves and claim liabilities, unpaid losses, and loss/claim adjustment expenses shall be based upon the estimated ultimate cost of settling the claims (including the effects of inflation and other societal and economic factors), using past experience adjusted for current trends, and any other factors that would modify past experience . . ."

It is recommended that the Company address these ongoing reserving inadequacies and increase its carried reserves to an appropriate level, pursuant to the provisions of Section 1303 of the New York Insurance Law and SSAP No. 55.

By virtue of the Company's 21-month loss and loss adjustment expense adverse runoff for accident years 2018 and prior, as reported by the Company in its filed September 30, 2020 quarterly statement, the Company has acknowledged a deficiency of $2,462,000.

5. MARKET CONDUCT

In the course of this examination, a review was made of the manner in which the Company conducts its business and fulfills its contractual obligations to policyholders and claimants.

The review was general in nature and is not to be construed to encompass the more precise scope of a market conduct investigation, which is the responsibility of the Market Conduct Unit of the Property Bureau of this Department.

Part 216.6(h) of Department Regulation No. 64 states:

> (h) Any notice rejecting any element of a claim involving personal property insurance shall contain the identity and the claims processing address of the insurer, the insured's policy number, the claim number, and the following statement prominently set forth:
>
> 'Should you wish to take this matter up with the New York State Department of Financial Services, you may file with the department either on its website at *http://www.dfs.ny.gov/consumer/fileacomplaint.htm* or you may write to or visit the Consumer Assistance Unit, Financial Frauds and Consumer Protection Division, New York State Department of Financial Services, at: One State Street, New York, NY 10004; One Commerce Plaza, Albany, NY 12257; 1399 Franklin Avenue, Garden City, NY 11530; or Walter J. Mahoney Office Building, 65 Court Street, Buffalo, NY 14202.'

Examination review of denied claims revealed that the notices in the denial letters either did not include, or was not consistent, with the language specified in Regulation No. 64.

It is recommended that the Company comply with all the requirements of Part 216.6(h) of Department Regulation No. 64 when issuing notices rejecting any element of a claim involving personal property insurance.

6. SUBSEQUENT EVENTS

Effective January 1, 2019, the Company (and CCIC and MIC, each independently) entered into a Management Service Agreement with Statewide. Under the terms of the agreement, Statewide will provide all underwriting, marketing, claims and some accounting services. These agreements were approved by the Department.

On March 11, 2020, the World Health Organization declared an outbreak of a novel coronavirus ("COVID-19") pandemic. The risks and uncertainties surrounding the COVID-19 pandemic may impact the Company's, and its competitors', operational and financial performance. The extent of the impact of the COVID-19 pandemic on the Company's operational and financial performance will depend on certain developments, including the duration and spread of the outbreak, regulatory decisions, and the impact on the financial markets. All of these developments are uncertain and cannot be predicted. The related financial impact cannot be reasonably estimated at this time.

7. COMPLIANCE WITH PRIOR REPORT ON EXAMINATION

There were no comments or recommendations in the prior report on examination.

8. SUMMARY OF COMMENTS AND RECOMMENDATIONS

ITEM			PAGE NO.
A.		Corporate Governance	
	i.	It is recommended that the Company comply with its committee charters by holding all required meetings pursuant to such charter.	4
	ii.	It is recommended that the Company ensure compliance with Department Regulation No. 118 by notifying the superintendent of all changes in audit committee membership within 30 days.	5
	iii.	It is recommended that the Company comply with the provisions of Section 312(b) of the New York Insurance Law and provide a copy of the report on examination to each member of its board of directors, and maintain a statement signed by each board member indicating that he/she has received and read the report.	5
B.		Holding Company It is recommended that the Company correctly complete its investment schedules in its filed annual statements with information pertaining to its subsidiary, Statewide.	8
C.		Accounts and Records It is recommended that the Company exercise greater care in the preparation of its annual statement in all future filings with this Department.	10
D.		Loss and Loss Adjustment Expense It is recommended that the Company address the ongoing reserving inadequacies and increase its carried reserves to an appropriate level, pursuant to the provisions of Section 1303 of the New York Insurance Law and SSAP No. 55.	15
E.		Market Conduct It is recommended that the Company comply with all the requirements of Part 216.6(h) of Department Regulation No. 64 when issuing notices rejecting any element of a claim involving personal property insurance.	16

Respectfully submitted,

______________/S/_________________
Dilbrina Belgrave, AFE, CISA
Senior Insurance Examiner

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

Dilbrina Belgrave, being duly sworn, deposes and says that the foregoing report, subscribed by her, is true to the best of her knowledge and belief.

____________/S/___________
Dilbrina Belgrave

Subscribed and sworn to before me

this_________ day of __________________, 2021.

APPOINTMENT NO. 31946

NEW YORK STATE

DEPARTMENT OF FINANCIAL SERVICES

*I, **Linda A. Lacewell**, Acting 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:*

Dilbrina Belgrave

as a proper person to examine the affairs of the

Mid-Hudson Co-Operative Insurance Company

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 by name and affixed the official Seal of the Department at the City of New York

this 30th day of April, 2019

LINDA A. LACEWELL
Acting Superintendent of Financial Services

By:

Joan Riddell
Deputy Bureau Chief