



FINANCIAL CONDITION REPORT ON EXAMINATION

OF THE

WILTON REASSURANCE LIFE COMPANY

OF

NEW YORK

AS OF DECEMBER 31, 2020

EXAMINER:
DATE OF REPORT:

PHILIP G. TALERICO, CPA, CFE
JUNE 14, 2022

TABLE OF CONTENTS

<u>ITEM</u>		<u>PAGE NO.</u>
1.	Executive summary	2
2.	Scope of examination	3
3.	Description of Company	5
	A. History	5
	B. Holding company	5
	C. Organizational chart	6
	D. Service agreements	7
	E. Management	7
4.	Territory and plan of operations	9
	A. Statutory and special deposits	9
	B. Direct operations	10
	C. Reinsurance	10
5.	Financial statements	11
	A. Independent accountants	11
	B. Net admitted assets	12
	C. Liabilities, capital and surplus	13
	D. Condensed summary of operations	14
	E. Capital and surplus account	15
6.	Subsequent events	16
7.	Prior report summary and conclusions	17
8.	Summary and conclusions	18

KATHY HOCHUL
Governor



ADRIENNE A. HARRIS
Superintendent

June 17, 2022

Honorable Adrienne A. Harris
Superintendent of Financial Services
New York, New York 10004

Dear Adrienne A. Harris:

In accordance with instructions contained in Appointment No. 32294, dated August 18, 2021 and annexed hereto, an examination has been made into the condition and affairs of Wilton Reassurance Life Company of New York, hereinafter referred to as "the Company". The Company's administrative office is located at 20 Glover Avenue, 4th Floor, Norwalk, CT 06850. Due to the COVID-19 pandemic, the examination was conducted remotely.

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 comment contained in this report is summarized below.

- In March 2021, Wilton Reassurance Company entered into a definitive agreement to purchase 100% of the common stock of Allstate Life Insurance Company of New York and Intramerica Life Insurance Company from the Allstate Corporation. Allstate Life Insurance Company of New York has policies in force consisting of a closed block of interest-sensitive and traditional life insurance and annuities, while Intramerica Life Insurance Company policies consist of a closed block of variable annuities. After obtaining all regulatory approvals, Wilton Reassurance Company merged Allstate Life Insurance Company of New York and Intramerica Life Insurance Company with and into the Company. (See item 6 of this report.)

2. SCOPE OF EXAMINATION

The examination of the Company was a full-scope examination as defined in the NAIC *Financial Condition Examiners Handbook, 2021 Edition* (the “Handbook”). The examination covers the five-year period from January 1, 2016 through December 31, 2020. The examination was conducted observing the guidelines and procedures in the Handbook and, where deemed appropriate by the examiner, transactions occurring subsequent to December 31, 2021 but prior to the date of this report (i.e., the completion date of the examination) were also reviewed.

The examination was conducted on a risk-focused basis in accordance with the provisions of the Handbook published by the National Association of Insurance Commissioners (“NAIC”). The Handbook guidance provides for the establishment of an examination plan based on the examiner’s assessment of risk in the insurer’s operations and utilizing that evaluation in formulating the nature and extent of the examination. The examiner planned and performed the examination to evaluate the current financial condition as well as identify prospective risks that may threaten the future solvency of the insurer. The examiner identified key processes, assessed the risks within those processes and evaluated the internal control systems and procedures used to mitigate those risks. The examination also included assessing the principles used and significant estimates made by management, evaluating the overall financial statement presentation, and determining management’s compliance with New York statutes and Department guidelines, Statutory Accounting Principles as adopted by the Department, and annual statement instructions.

The examination was coordinated in conjunction with the examination of the Company’s parent, Wilton Reassurance Company (“WRAC”), a Minnesota domestic insurance company. The examination of the Group was called by the Minnesota Department of Commerce in accordance with the Handbook guidelines, through the NAIC’s Financial Examination Electronic Tracking System. Minnesota served as the lead state with participation from Illinois, Missouri, New York, and Texas. Since the lead and participating states are all accredited by the NAIC, all states deemed it appropriate to rely on each other’s work.

Information about the Company’s organizational structure, business approach and control environment were utilized to develop the examination approach. The Company’s risks and management activities were evaluated incorporating the NAIC’s nine branded risk categories. These categories are as follows:

- Pricing/Underwriting
- Reserving
- Operational
- Strategic
- Credit
- Market
- Liquidity
- Legal
- Reputational

The Company was audited annually, for the years 2016 through 2020, by the accounting firm of Deloitte & Touche, LLP (“Deloitte”). The Company received an unqualified opinion in all years. Certain audit workpapers of the accounting firm were reviewed and relied upon in conjunction with this examination. An independent internal audit department exists at the holding company level. The internal audit department was given the task of assessing the internal control structure and compliance with the Sarbanes-Oxley Act of 2002 (“SOX”) for all entities within the Group. The internal audit function is co-sourced, and the Group utilizes PricewaterhouseCoopers, LLP (“PwC”) as its service provider for certain underlying compliance procedures. Where applicable, SOX workpapers and reports were reviewed, and portions were relied upon for this examination.

The examiner reviewed the corrective actions taken by the Company with respect to the violation contained in the prior report on examination. The results of the examiner’s review are contained in item 7 of this report.

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, under the name of American Life Insurance Company of New York (“ALNY”), was incorporated as a stock life insurance company under the laws of New York on March 23, 1955, was licensed on November 9, 1956 and commenced business on April 1, 1957. Initial resources of \$2,000,000, consisting of common capital stock of \$500,000 and paid in and contributed surplus of \$1,500,000, were provided through the sale of 50,000 shares of common stock (with a par value of \$10 each) for \$40 per share.

On September 27, 2006, Wilton Re U.S. Holdings, Inc. (“Wilton Re Holdings”) acquired all the issued and outstanding shares of ALNY, Utica National Life Insurance Company (“Utica”), and the North American Company for Life and Health Insurance of New York (“NANY”) for an aggregate purchase price of \$156.7 million. Wilton Re Holdings contributed all of the issued and outstanding capital stock of ALNY, Utica, and NANY to its wholly-owned subsidiary, WRAC. On September 29, 2006, Utica and NANY were merged with and into ALNY with ALNY surviving. ALNY was renamed Wilton Reassurance Life Company of New York.

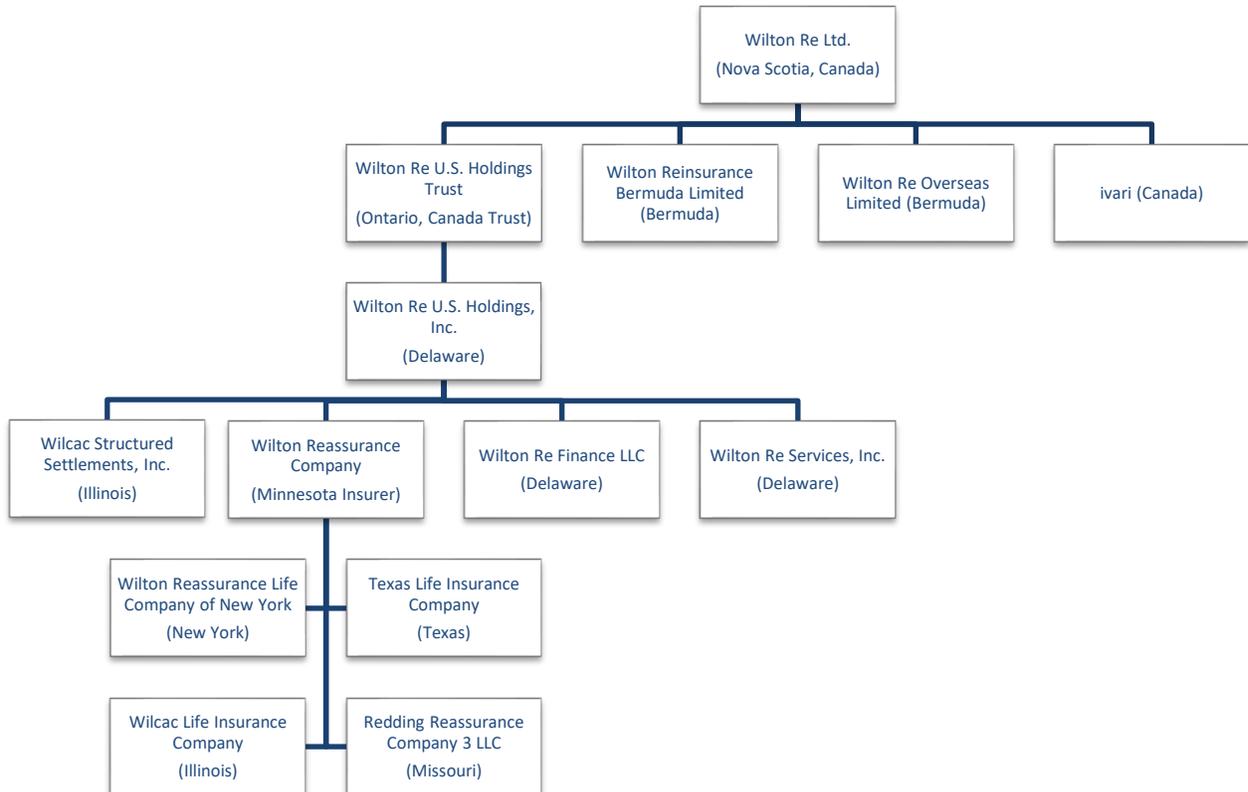
Changes in the capital and surplus of the Company since incorporation resulted in common capital stock and paid in and contributed surplus of \$2,502,4500 and \$71,546,348, respectively, as of December 31, 2020.

B. Holding Company

The Company is a wholly owned subsidiary of WRAC, a Minnesota domestic insurance company. WRAC is in turn a wholly owned subsidiary of Wilton Re Holdings, a Delaware corporation. The ultimate parent of the Company is Wilton Re Limited, a Nova Scotia, Canada corporation.

C. Organizational Chart

An organization chart reflecting the relationship between the Company and significant entities in its holding company system as of December 31, 2020 follows:



D. Service Agreements

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

Type of Agreement	Effective Date	Provider(s) of Service(s)	Recipient(s) of Service(s)	Specific Service(s) Covered	Income/ (Expense)* for as of Year of the Examination
Administrative Services File No. 35181H	09/27/2006	Wilton Re Services Inc.	The Company	Accounting, actuarial and administrative	2016 \$ (957,198) 2017 \$(2,117,764) 2018 \$(4,189,037) 2019 \$(6,559,869) 2020 \$(8,675,089)

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

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

E. Management

The Company's by-laws provide that the board of directors shall be comprised of not less than 7 and not more than 13 directors. Directors are elected for a period of one year at the annual meeting of the stockholders held in the second quarter of each year. As of December 31, 2020, the board of directors consisted of eight members. Meetings of the board are held annually and as frequently as the dispatch of business shall require.

The eight board members and their principal business affiliation, as of December 31, 2020, were as follows:

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
Perry H. Braun New York, New York	Senior Vice President and Chief Investment Officer Wilton Reassurance Life Company of New York	2006
Robert V. Deutsch* Armonk, New York	Chief Strategy Officer Hamilton Insurance Group	2006
Michael E. Fleitz Wilton, Connecticut	Chief Executive Officer Wilton Reassurance Life Company of New York	2006
Steven D. Lash	Senior Vice President and Chief Financial Officer	2017

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
Demarest, New Jersey	Wilton Reassurance Life Company of New York	
Herman D. Overbeeke* Wilton, Connecticut	President and Chief Executive Officer Brake Parts Inc., LLC	2007
John J. Quinn* Indianapolis, Indiana	Owner John Quinn Consulting	2018
John P. Schreiner* Chicago, Illinois	Retired Actuary Milliman, Inc.	2012
Chris C. Stroup Wilton, Connecticut	Chairman Wilton Reassurance Life Company of New York	2006

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

In July 2021, Chris C. Stroup left the board and was replaced by Michael Fleitz as Chairman. Further, in July 2021, Scott Sheefel assumed the role of President and replaced Chris Stroup on the board of directors. Finally, in July 2021, Dmitri E. Ponomarev was appointed to the board.

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.

The following is a listing of the principal officers of the Company as of December 31, 2020:

<u>Name</u>	<u>Title</u>
Michael E. Fleitz	Chief Executive Officer
Steven D. Lash	Senior Vice President, Chief Financial Officer
Mark R. Sarlitto	Senior Vice President, General Counsel and Secretary
Robert C. Fahr	Vice President, Controller
Robert L. Buckner	Vice President, Valuation Actuary

Patricia Harrigan, Associate General Counsel, is the Company's designated consumer services officer per Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64).

In July 2021, Scott Sheefel was elected as President, replacing Chris Stroup and assumed Mr. Stroup's role as a director in the board of director as well.

4. TERRITORY AND PLAN OF OPERATIONS

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 licensed to transact business in all 50 states, the District of Columbia and the U.S. Virgin Islands. In 2020, 66.8% of life premiums, 87.4% of annuity considerations, and 84% of accident and health premiums were received from New York. Policies are written on a participating and non-participating basis.

The following tables show the percentage of direct premiums received, by state, and by major lines of business for the year 2020:

<u>Life Insurance Premiums</u>		<u>Annuity Considerations</u>	
New York	66.8%	New York	87.4%
Florida	8.8	Connecticut	8.1
Pennsylvania	4.6	Florida	1.4
New Jersey	3.2	New Jersey	1.3
North Carolina	<u>2.0</u>	Rhode Island	<u>0.6</u>
Subtotal	85.4%	Subtotal	98.8%
All others	<u>14.6</u>	All others	<u>1.2</u>
Total	<u>100.0%</u>	Total	<u>100.0%</u>

<u>Accident and Health Insurance Premiums</u>	
New York	84.0%
California	6.1
Florida	2.1
Ohio	1.7
Texas	<u>0.6</u>
Subtotal	94.5%
All others	<u>5.5</u>
Total	<u>100.0%</u>

A. Statutory and Special Deposits

As of December 31, 2020, the Company had \$5,000,000 (par value) of Type B assets on deposit with the State of New York, its domiciliary state, for the benefit of all policyholders,

claimants and creditors of the Company. As reported in Schedule E of the 2020 filed annual statement an additional \$3,955,966 was being held by the states of Arkansas, Florida, Georgia, Massachusetts, New Mexico, North Carolina, South Carolina, and Virginia and U.S. Virgin Islands.

B. Direct Operations

The Company operates predominantly in the individual life, as well as the group and individual annuity lines of business. The Company's operating strategy is focused on the acquisition of closed blocks of life and annuity business and are considered run-off as the Company does not actively market or write new business.

The Company utilizes third party administrators ("TPAs") for the purpose of administering the closed blocks of business acquired. These TPAs include DXC Technology Services LLC, Alliance-One Services, Inc., Mutual of America Life Insurance Company, American Heritage Life Insurance Company, Jackson National Life Insurance Company, American Progressive Life & Health Insurance Company of New York, and Swiss Re Life & Health America, Inc.

C. Reinsurance

As of December 31, 2020, the Company had reinsurance treaties in effect with 24 companies, of which 12 were authorized, accredited, or certified. The Company's life, accident and health business is reinsured on a coinsurance, modified-coinsurance, and yearly renewable term basis. Reinsurance is provided on an automatic and facultative basis.

The maximum retention limit for individual life contracts is \$1,000,000. The total face amount of life insurance ceded as of December 31, 2020, was \$6,660,758,194, which represents 85% of the total face amount of life insurance in force. Reserve credit taken for reinsurance ceded to unauthorized companies, totaling \$26,223,222, was supported by letters of credit, trust agreements and funds withheld.

The total face amount of life insurance assumed as of December 31, 2020, was \$220,731,538.

5. FINANCIAL STATEMENTS

The following statements show the assets, liabilities, capital and surplus as of December 31, 2020, as contained in the Company's 2020 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, 2020 filed annual statement.

A. Independent Accountants

The firm of Deloitte was retained by the Company to audit the Company's combined statutory basis statements of financial position 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.

Deloitte 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	\$682,887,448
Stocks:	
Preferred stocks	38,792,132
Common stocks	594,640
Mortgage loans on real estate:	
First liens	15,362,565
Cash, cash equivalents and short-term investments	15,886,308
Contract loans	11,675,726
Other invested assets	81,337,176
Receivable for securities	505,353
Investment income due and accrued	5,515,596
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	678,376
Deferred premiums, agents' balances and installments booked but deferred and not yet due	814,724
Reinsurance:	
Amounts recoverable from reinsurers	5,272,112
Other amounts receivable under reinsurance contracts	8,119,621
Net deferred tax asset	5,366,023
Guaranty funds receivable or on deposit	300,309
Health care and other amounts receivable	732
Other assets non-admitted	
Prepaid reinsurance - NYSID allowed under Circ Letter 11	855,859
From separate accounts, segregated accounts and protected cell accounts	<u>963,548</u>
Total admitted assets	<u>\$874,928,248</u>

C. Liabilities, Capital and Surplus

Aggregate reserve for life policies and contracts	\$ 720,052,642
Aggregate reserve for accident and health contracts	19,281
Liability for deposit-type contracts	10,544,923
Contract claims:	
Life	12,940,216
Accident and health	7,423
Premiums and annuity considerations for life and accident and health contracts received in advance	67,590
Contract liabilities not included elsewhere:	
Surrender values on cancelled contracts	16,502
Other amounts payable on reinsurance	706,419
Interest maintenance reserve	10,590,615
Commissions to agents due or accrued	47,457
Commissions and expense allowances payable on reinsurance assumed	(105,066)
General expenses due or accrued	11,699,619
Taxes, licenses and fees due or accrued, excluding federal income taxes	192,366
Current federal and foreign income taxes	665,749
Unearned investment income	61,597
Amounts withheld or retained by company as agent or trustee	(427,281)
Amounts held for agents' account	638,342
Remittances and items not allocated	2,971,270
Miscellaneous liabilities:	
Asset valuation reserve	14,690,725
Reinsurance in unauthorized companies	2,219,965
Funds held under reinsurance treaties with unauthorized reinsurers	2,939,544
Payable to parent, subsidiaries and affiliates	538,701
Abandoned property	1,008,495
Contingency reserve	404,779
Payable to NACOLAH	250,702
From Separate Accounts statement	<u>963,548</u>
Total liabilities	<u>\$ 793,706,123</u>
Common capital stock	\$ 2,502,500
Gross paid in and contributed surplus	71,546,348
Unassigned funds (surplus)	<u>7,173,277</u>
Surplus	<u>\$ 78,719,625</u>
Total capital and surplus	<u>\$ 81,222,125</u>
Total liabilities, capital and surplus	<u>\$ 874,928,248</u>

D. Condensed Summary of Operations

	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Premiums and considerations	\$19,428,714	\$14,451,775	\$13,206,043	\$11,383,945	\$11,591,595
Investment income	45,890,949	45,113,143	43,302,721	45,194,264	44,021,339
Commissions and reserve adjustments on reinsurance ceded	1,487,298	1,584,586	(184,822)	261,501	414,486
Miscellaneous income	<u>(140,462)</u>	<u>(110,941)</u>	<u>119,355</u>	<u>401,573</u>	<u>190,272</u>
Total income	<u>\$66,666,499</u>	<u>\$61,038,563</u>	<u>\$56,443,297</u>	<u>\$57,241,283</u>	<u>\$56,217,692</u>
Benefit payments	\$46,338,073	\$48,501,885	\$47,478,324	\$44,954,368	\$48,133,566
Increase in reserves	1,548,929	(8,483,296)	(11,150,518)	(15,633,879)	7,225,336
Commissions	1,108,863	872,247	(264,707)	628,397	352,176
General expenses and taxes	6,700,902	5,744,562	7,527,090	10,943,231	11,623,909
Net transfers to (from) Separate Accounts	(44,796)	(367)	13,565	(70,655)	(4,299)
Miscellaneous deductions	<u>(9,789)</u>	<u>47,906</u>	<u>(4,444)</u>	<u>(322,104)</u>	<u>393,325</u>
Total deductions	<u>\$55,642,182</u>	<u>\$46,682,937</u>	<u>\$43,599,310</u>	<u>\$40,499,358</u>	<u>\$67,724,013</u>
Net gain (loss)	\$11,024,317	\$14,355,626	\$12,843,987	\$16,741,925	\$(11,506,321)
Federal and foreign income taxes incurred	<u>5,019,401</u>	<u>6,256,962</u>	<u>3,916,361</u>	<u>3,561,948</u>	<u>(646,124)</u>
Net gain (loss) from operations before net realized capital gains	\$ 6,004,916	\$ 8,098,664	\$ 8,927,626	\$13,179,977	\$(10,860,197)
Net realized capital gains (losses)	<u>(1,153,107)</u>	<u>(287,587)</u>	<u>(224,608)</u>	<u>(268,006)</u>	<u>(845,636)</u>
Net income (loss)	<u>\$ 4,851,809</u>	<u>\$ 7,811,077</u>	<u>\$ 8,703,018</u>	<u>\$12,911,971</u>	<u>\$(11,705,833)</u>

E. Capital and Surplus Account

	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Capital and surplus, December 31, prior year	<u>\$90,770,807</u>	<u>\$96,257,825</u>	<u>\$ 92,866,976</u>	<u>\$100,047,419</u>	<u>\$103,176,560</u>
Net income	\$ 4,851,809	\$ 7,811,077	\$ 8,703,018	\$ 12,911,971	\$(11,705,833)
Change in net unrealized capital gains (losses)	254,137	3,452,065	(178,839)	516,894	1,345,126
Change in net deferred income tax	7,927,878	(6,867,291)	1,909,990	996,632	4,043,178
Change in non-admitted assets and related items	(7,439,225)	7,287,326	(35,163)	(475,169)	(3,651,594)
Change in liability for reinsurance in unauthorized companies	(289,768)	(4,640,326)	6,275,763	820,345	(133,773)
Change in reserve valuation basis	0	0	0	0	(5,902,397)
Change in asset valuation reserve	182,182	(1,058,166)	(958,864)	(1,636,790)	(5,949,142)
Dividends to stockholders	0	(9,375,533)	(8,535,462)	(10,004,742)	0
Net change in capital and surplus for the year	<u>\$ 5,487,013</u>	<u>\$ (3,390,849)</u>	<u>\$ 7,180,443</u>	<u>\$ 3,129,141</u>	<u>\$(21,954,436)</u>
Capital and surplus, December 31, current year	<u>\$96,257,825</u>	<u>\$92,866,976</u>	<u>\$100,047,419</u>	<u>\$103,176,560</u>	<u>\$ 81,222,125</u>

6. SUBSEQUENT EVENTS

In March 2021, WRAC entered into a definitive agreement to purchase 100% of the common stock of Allstate Life Insurance Company of New York and Intramerica Life Insurance Company from the Allstate Corporation and was submitted to the Department for approval on April 27, 2021. Allstate Life Insurance Company of New York has policies in force consisting of a closed block of interest-sensitive and traditional life insurance and annuities, while Intramerica Life Insurance Company policies consist of a closed block of variable annuities. The application for acquisition of control was approved by the Department on September 27, 2021. On October 1, 2021, after obtaining all required regulatory approvals, the acquisition was announced and was closed for an approximate purchase price of \$400,000,000. Subsequently, WRAC merged Allstate Life Insurance Company of New York and Intramerica Life Insurance Company with and into the Company.

7. PRIOR REPORT SUMMARY AND CONCLUSIONS

Following is the violation contained in the prior report on examination and the subsequent actions taken by the Company in response to the citation:

<u>Item</u>	<u>Description</u>
A	<p>The Company violated Section 4228(h) of the New York Insurance Law by failing to demonstrate that pricing was performed prior to the date the statement of self-support was signed.</p> <p>The examination revealed that the demonstrations were signed, dated and finalized prior to the date of the statement of self-support and that the demonstrations were organized, containing detailed narrative descriptions of the methodologies and material assumptions used such that another actuary can make a reasonable assessment of the analysis performed.</p>

8. SUMMARY AND CONCLUSIONS

Following is the comment contained in this report:

<u>Item</u>	<u>Description</u>	<u>Page No(s).</u>
A	In March 2021, WRAC entered into a definitive agreement to purchase 100% of the common stock of Allstate Life Insurance Company of New York and Intramerica Life Insurance Company from the Allstate Corporation. After obtaining all required regulatory approvals, WRAC merged Allstate Life Insurance Company of New York and Intramerica Life Insurance Company with and into the Company.	16

Respectfully submitted,



Philip G. Talerico, CPA, CFE
Baker Tilly US, LLP

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

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



Philip G. Talerico

Subscribed and sworn to before me
this 17th day of June, 2022
Audrey Hall

AUDREY HALL
Notary Public, State of New York
No. 01HA8274800
Qualified in Kings County
Commission Expires January 28, 2025

Respectfully submitted,

_____/s/
Courtney Williams
Principal Insurance Examiner

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

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

_____/s/
Courtney Williams

Subscribed and sworn to before me
this _____ day of _____

APPOINTMENT NO. 32294

NEW YORK STATE

DEPARTMENT OF FINANCIAL SERVICES

*I, **LINDA A. LACEWELL**, 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:*

***PHILIP G. TALERICO
(BAKER TILLY US, LLP)***

as a proper person to examine the affairs of the

WILTON REASSURANCE LIFE COMPANY OF NEW YORK

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

this 18th day of August, 2021

LINDA A. LACEWELL
Superintendent of Financial Services

By:

mark mcleod

MARK MCLEOD
DEPUTY CHIEF - LIFE BUREAU

