# STATE OF CONNECTICUT



### INSURANCE DEPARTMENT

#### ORDER ADOPTING REPORT OF EXAMINATION

I, Anne Melissa Dowling, Deputy Insurance Commissioner of the State of Connecticut, having fully considered and reviewed the Examination Report (the "Report") of the Knights of Columbus ("the Knights") as of December 31, 2013, do hereby adopt the findings and recommendations contained therein based on the following findings and conclusions,

#### TO WIT:

- 1. I, Anne Melissa Dowling, Deputy Insurance Commissioner of the State of Connecticut, and as such is charged with the duty of administering and enforcing the provisions of Title 38a of the Connecticut General Statutes ("CGS").
- 2. The Knights is a domestic insurer authorized to transact the business of insurance in the State of Connecticut.
- 3. On November 19, 2014, the verified Report of the Knights was filed with the Connecticut Insurance Department (the "Department").
- 4. In accordance with CGS §38a-14(e) (3), the Company was afforded a period of thirty (30) days within which to submit to the Connecticut Insurance Department a written submission or rebuttal with respect to any matters contained in the Report.
- 5. On December 11, 2014, the Knights filed a written submission indicating that they were in agreement with all of the recommendations contained in the Report. A copy of the report is attached hereto and incorporated herein as Exhibit A.

## NOW, THEREFORE, it is ordered as follows:

- 1. That the Report of the Knights hereby is adopted as filed with the Department.
- 2. That the Knights shall comply with all of the recommendations set forth in the Report, and that the failure of the Knights to so comply shall result in sanctions or administrative action as provided by Title 38a of the CGS.

Dated at Hartford, Connecticut this 15th day of December, 2014

Anne Melissa Dowling

Deputy Insurance Commissioner

### EXHIBIT A

## **EXAMINATION REPORT**

OF THE

## KNIGHTS OF COLUMBUS

AS OF

**DECEMBER 31, 2013** 

BY THE CONNECTICUT INSURANCE DEPARTMENT

## TABLE OF CONTENTS

	<u>PAGE</u>
Salutation	1
Scope of Examination	1
History	2
Organizational Chart	3
Management and Control	3
Related Party Transactions	5
Insurance Coverage	6
Territory and Plan of Operation	7
Reinsurance	7
Information Technology Controls	8
Accounts and Records	8
Financial Statements	9
Assets	9
Liabilities, Surplus and Other Funds	10
Statement of Income	11
Pricing, Underwriting, Reserve and Liquidity Risk Review	12
Conclusion	13
Signature	14

The Honorable Thomas B. Leonardi Insurance Commissioner State of Connecticut Insurance Department 153 Market Street Hartford, Connecticut 06103

#### Dear Commissioner:

In compliance with your instructions and pursuant to the requirements of Section 38a-616 of the Connecticut General Statutes (CGS), the undersigned has made a financial examination of the condition and affairs of the:

#### KNIGHTS OF COLUMBUS

(hereinafter referred to as the Order), a fraternal benefit Order incorporated under the laws of the state of Connecticut and having its home office located at 1 Columbus Plaza, New Haven, Connecticut. The report of such examination is submitted herewith.

### SCOPE OF EXAMINATION

The previous examination of the Order was conducted as of December 31, 2008. The current examination, which covers the period from January 1, 2009 to December 31, 2013, was conducted at the administrative office of the Order.

As part of the examination planning procedures, the Financial Regulation Division of the Connecticut Insurance Department (the Department) reviewed the following materials submitted by the Order:

- Audit reports from 2009 through 2013 completed by the CPA firm retained by the Order;
- Board of Director (Board) minutes from 2009 through the latest available;
- Committee minutes from 2009 through the latest available;
- Management's Discussion and Analysis;
- · Statements of Actuarial Opinion; and
- Annual statements filed with the Department.

A review of the 2009 through 2013 independent audit reports indicated no material concerns with respect to the financial condition or regulatory compliance of the Order. A comprehensive review was made of the financial analysis files and documents submitted to the Financial Analysis Unit of the Department.

Workpapers prepared by the Order's independent public accountant, Seward and Monde, in connection with its annual statutory audit were reviewed and relied upon to the extent deemed necessary.

Jennan Enterprises, LLC (Jennan) was engaged by the Department to assist in staffing the examination and to perform the Information Technology (IT) controls review of the Order.

The examination was conducted on a full scope, comprehensive basis in accordance with the procedures outlined in the National Association of Insurance Commissioners (NAIC) Financial Condition Examiners Handbook (the Handbook). The Handbook requires that we plan and perform the examination to evaluate the financial condition and identify prospective risks of the Order by obtaining information about the Order, including corporate governance, identifying inherent risks within the Order, and evaluating system controls and procedures used to mitigate those risks. An examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation, management compliance with the NAIC Accounting Practices & Procedures Manual (Manual) and the NAIC Fraternal Annual Statement Instructions (Instructions).

Comments in this report are generally limited to exceptions noted or to items considered to be of a material nature.

Failure of items in this report to add to totals or for totals to agree with captioned amounts is due to rounding.

#### **HISTORY**

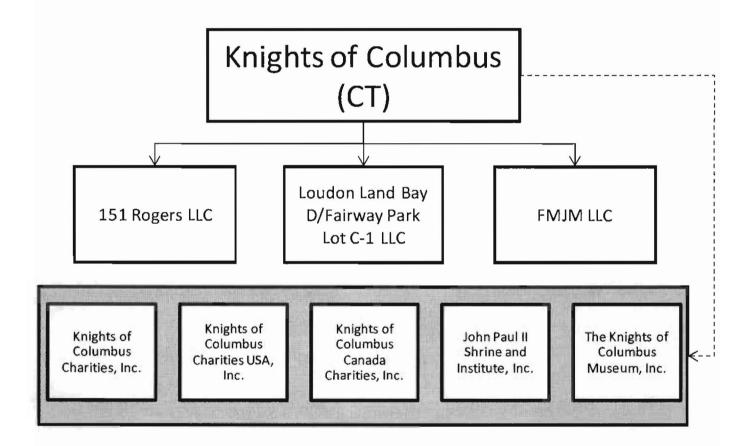
The Order was founded February 2, 1882, through the efforts of Reverend Michael J. McGivney. By special act of the General Assembly of the State of Connecticut, a charter was issued to the Order on March 29, 1882.

The first subordinate council was created on May 15, 1882, in New Haven, Connecticut, and in 1885, the first council outside of Connecticut was instituted in Rhode Island. The first council outside of the United States was established in 1897, in Montreal, Quebec, Canada. Associate (non-insurance) members are admitted in Mexico, the Philippines, Poland, Lithuania, Ukraine, several Caribbean countries, the United States, and Canada.

The Order became a legal reserve Order in 1902, insuring only members until 1948, when the program was extended to juvenile sons upon application by the member. It was further extended in 1958, to include juvenile daughters and again in 1959, to include wives.

### ORGANIZATIONAL CHART

The following organizational chart presents the identities of and interrelationships between the Order and related companies as of December 31, 2013:



### MANAGEMENT AND CONTROL

The Charter Constitution and Laws of the Knights provide that the Board meet at least quarterly. The executive authority of the Order is vested in the Board consisting of 24 insurance members, the Supreme Chaplain, and Past Supreme Knights of the Order who retired from office in good standing. The regular term of Directors other than the Supreme Chaplain and Past Supreme Knights shall be three years from and after the first day of September following their election.

Standing committees of the Board that pertain to the insurance operations are the Audit, Executive and Finance, Executive Compensation, and Pension-401(k) committees. The Board may establish other committees as they deem to be in the best interest of the Order.

The Board and principal officers serving the Order at December 31, 2013, were:

<u>Directors</u> <u>Title and Principal Business Affiliation</u>

Most Rev. William E. Lori Supreme Chaplin Archbishop of Baltimore, Maryland

Carl A. Anderson Supreme Knight and Chief Executive Officer, Knights of Columbus

Daniel J. Baker Deputy Chief of Training, US Army, Shaw Air Force Base

Meclea L. Casavant

Michael G. Conrad

Virgil C. Dechant

Retired Social Worker, Government of Alberta

Claims Representative, Metropolitan Utilities

Past Supreme Knight, Knights of Columbus

Scott A. Flood Mail Carrier, U.S. Postal Service

Natale L. Gallo Retired Educator, Ontario Secondary Schools

Michael T. Gilliam Regional Agriculture Business Specialist, University of Missouri

Arthur J. Harris Retired Quality Engineer, Eastman Kodak Co.

Patrick E. Kelly

Paul J. Lambert

Logan T. Ludwig

John A. Marrella

Javier S. Martinez

Charles E. Maurer, Jr.

Vice President for Public Policy, Knights of Columbus

Telecommunications, Rural Electric Cooperative

Deputy Supreme Knight, Knights of Columbus

Supreme Advocate, Knights of Columbus

Counsel, United Insurance Company

Supreme Secretary, Knights of Columbus

Daniel Rossi Executive Director, N.E., Regional Association of State

Agricultural Experiment Station Directors

Supreme Treasurer, Knights of Columbus

James R. Scroggin Retired Administrator, Fresno Public School System

Brian W. Simer Financial Advisor, self-employed

Thomas P. Smith, Jr. Chief Insurance Officer, Knights of Columbus Kenneth E. Stockwell Retired Bank Vice President and Business Owner

Alonso L. Tan Chairman, CEO, Goldrock Construction & Development Corp.

Thomas M. Wegener Purchasing Agent, Michigan Senate Attorney

Michael L. Wills Attorney, Tennessee Valley Authority

Ronald B. White Retired, AT&T

Senior Officers Title

Michael J. O'Connor

Carl A. Anderson Supreme Knight and CEO (President)

Most Rev. William E. Lori Supreme Chaplain

Logan T. Ludwig
Charles E. Maurer, Jr.
Michael J. O'Connor
Deputy Supreme Knight
Supreme Secretary
Supreme Treasurer

John A. Marrella Supreme Advocate

Senior Officers Title

Thomas P. Smith, Jr.

Terrence T. Lescoe
Anthony Minopoli
William Brown
Chief Compliance Officer
Chief Compliance Officer
Chief Compliance Officer
Chief Corporate Actuary
Chief Security Officer
Janice Castle
Director, Human Resources

#### Committees

The committees of the Board which pertain to the insurance operations as of December 31, 2013, were: (Supreme Officers who are Board Members)

Executive and Finance Audit

Virgil C. Dechant Michael L. Wills, Chairman

Thomas P. Smith, Jr. Michael T. Gilliam Patrick E. Kelly Brian W. Simer

Kenneth E. Stockwell

Daniel Rossi

Executive Compensation Pension-401 (K)

Arthur J. Harris, Chairman Logan T. Ludwig, Chairman

Thomas M. Wegener Carl A. Anderson
Daniel J. Baker Charles E. Maurer, Jr.
Daniel Rossi Michael J. O'Connor

John A. Marrella Thomas P. Smith, Jr.

#### RELATED PARTY TRANSACTIONS

The Order controls five affiliated, not for profit, 501(c) (3) organizations through a common board membership. (Refer to Organizational Chart section above) These affiliates include Knights of Columbus Charities, Inc., Knights of Columbus Charities, Inc., Knights of Columbus Charities USA, Inc., John Paul II Shrine and Institute, Inc., and The Knights of Columbus Museum, Inc. The organizations are financially interrelated and economic support is provided by the Order. The Order makes cash and in-kind donations and also provides services to these affiliated organizations. The Order also has 100% interest in three limited liability companies. Two of the LLCs consist of several parcels of

undeveloped land, and during 2013, it acquired a 100% interest in FMJM, LLC, a film production company.

In December 2009, the Order entered into written agreements for "certain economic and administrative support" with the following related parties: Knights of Columbus Family Life Bureau, Inc. (name changed to John Paul II Shrine and Institute, Inc.); Knights of Columbus Charities USA, Inc.; Knights of Columbus Charities, Inc.; The Knights of Columbus Museum, Inc.; and Knights of Columbus Canada Charities, Inc. All administrative services provided by the Order to the charities are "at no charge" to the charities.

#### INSURANCE COVERAGE

The Order is covered by a fidelity bond issued by St. Paul Fire and Marine Insurance Company. The aggregate limit of liability exceeds the suggested minimum limits of insurance per the Handbook.

In addition to the fidelity bond insurance, the Order is protected by the following insurance coverages:

Insurance Company

American Insurance Company

Chubb

Zurich American Insurance Company

Steadfast Insurance Company Federal Insurance Company

Hartford Fire Insurance Company

Hartford Life and Accident Insurance Company

Federal Insurance Company

Liberty Mutual Fire Insurance Company

National Union Fire Insurance Company of

Pittsburgh, PA

Hartford Casualty Insurance Company

Ohio Casualty Insurance Company

Scottsdale Insurance Company

St. Paul Fire and Marine Insurance Company

St. Paul Mercury Insurance Company

Travelers Property Casualty Insurance Company

Hartford Insurance Companies

Twin City Fire Insurance Company

XL Specialty Insurance Company

**RSUI** Indemnity Company

National Insurance Company

Travelers Casualty & Surety of America

Underwriters Lloyds

Insurance Coverage

Excess umbrella policy

Fiduciary responsibility

Directors and officers

Professional liability

Employment practices liability

Commercial general liability, Canadian general liability, business auto liability

Travel accident coverage

Excess Directors and Officers

Property

Special contingency policy, International

policy

Catastrophe

Excess umbrella policy

Catastrophe umbrella policy

Financial institution bond, computer crime,

comprehensive 3-D crime

Excess Directors and Officers

Mail, museum floater

Workers' compensation

Excess professional liability

Excess employment practices liability

Excess directors and officers

Excess employment practices liability

Excess fiduciary liability

Security and privacy

### TERRITORY AND PLAN OF OPERATION

As of December 31, 2013, the Order was licensed to transact fraternal insurance in all 50 states, the District of Columbia, and the 10 provinces of Canada, Puerto Rico, the Virgin Islands, Northern Mariana Islands, and Guam. In addition, the Order exists in non-insurance territories including the Philippines, Poland, Mexico, Panama, the Dominican Republic, Guatemala, the Bahamas, Saipan, Lithuania, and Ukraine.

The Order conducts its operations solely through a full-time, captive agency force distributing traditional life insurance, fixed annuity products, long-term care products, and disability income products to Catholic members and their families. Certificates are offered to members through a field organization operated on the general agency system. General agents are under contract directly with the Order. Their duties are primarily the recruiting, training and supervising of the agency field force, selling insurance and servicing certificate holders. All field agents are under contract with the general agent.

The Order offers individual life, individual fixed annuity, individual long-term care, and individual disability income products emphasizing the family insurance market. The Order offers life coverage on a non-rated and substandard basis. The permanent life and term life products are participating plans and include life paid-up at 100, life paid-up at 65, 20-pay life, 10-pay life, single premium life, graded premium, graded death benefit, annual renewable term, 10-year, 15-year and 20-year renewable and convertible level premium term plans. Term insurance riders are also offered. The Order also offers annuity products, including flexible premium deferred annuities, single premium deferred annuities, and single premium immediate annuities.

The Order offers two long-term care (LTC) products in the United States and Canada and utilizes third party administrators to assist with the underwriting, contract administration, and claims evaluation functions. The Order began offering a disability income (DI) product in April 2011. As with LTC, recognizing a need for DI product specific expertise, the Order entered into a contract with a third party administrator to assist with underwriting, contract administration, claims evaluation, and actuarial reserving functions.

#### REINSURANCE

The following is a summary of the reinsurance programs that the Order and its affiliates participated in as of December 31, 2013.

#### Reinsurance Ceded

The Order's retention limits are \$1.5 million per life for single life policies and \$2.25 million per life for second-to-die policies.

Limits in excess of the Order's retention up to \$5.0 million are ceded to an automatic reinsurance pool through General Re Life, Munich American Re, RGA Re and Swiss Re Life.

Facultative reinsurance is utilized for limits in excess of \$5.0 million and for those situations which do not qualify for automatic binding. Facultative reinsurance is typically placed with one or more of the four reinsurers who participate in the automatic reinsurance pool.

The current reinsurance program for new disability income insurance business is a 25% first dollar quota share coinsurance treaty with Munich American Reassurance Company.

#### INFORMATION TECHNOLOGY CONTROLS

The Department engaged Jennan to conduct a risk-focused assessment and review of the Order's IT General Controls (ITGC). The review was performed in accordance with the guidelines and procedures set forth in the Handbook, Exhibit C, Evaluation of Controls in IT.

Jennan's objectives were to determine that IT resources align with the Order's objectives and to ensure that significant risk (strategic, operational, reporting, and compliance) arising out of its IT environment were appropriately mitigated by strategies and controls as outlined in the Handbook's Exhibit C Part Two – Evaluation of Controls in IT Work Program. The objectives above were achieved through an independent assessment of the Order's IT controls based upon a combination of inquiry, observation and examination of documentation.

In early 2012, the Order invested significant time and resources to undertake a project to design and implement an IT controls testing framework. This project was completed at the end of 2013. The Order's Internal Audit Department plans to leverage the work performed and conduct an initial IT review for the year ending 2014. For purposes of conducting this examination, the Department was not able to rely on the Order's IT control environment.

#### ACCOUNTS AND RECORDS

The Order's general ledger is an integrated module of the Life 70 System. The general ledger is updated, primarily through system feeds, including its policy administration systems (Life 70 & Ingenium) and manually input journal entries. The Order has a license with Princeton to use the Princeton Asset Management system for processing investment activity. The Order uses a purchased software package from Commerce Clearing House called CorpSystem Workpaper Manager (CorpSystem) to prepare its accrual basis trial balance. The Order uses a purchased annual statement software package for financial reporting.

General ledger account balances contained on CorpSystem were reconciled and traced to the amounts reported in the statutory-basis financial statements for 2013. Further detailed analyses were performed on the individual accounts throughout the examination.

### **FINANCIAL STATEMENTS**

The following statements represent the Order's financial position as filed by the Order as of December 31, 2013. No adjustments were made to surplus as a result of the examination.

### **ASSETS**

		Nonadmitted	Net Admitted
	Assets	Assets	Assets
Bonds	\$18,022,383,879		\$18,022,383,879
Preferred stocks	89,844,631		89,844,631
Common stocks	528,549,871		528,549,871
Mortgage loans on real estate	166,275,673		166,275,673
Real estate	33,350,065		33,350,065
Cash (\$28,768,687), cash equivalents (\$0) and short-			
term investments (\$163,399,821)	192,168,508		192,168,508
Contract loans	972,050,306		972,050,306
Other invested assets	271,805,876	\$3,147,851	268,658,025
Receivables for securities	3,489,061		3,489,061
Securities lending reinvested collateral assets	42,932,807		42,932,807
Investment income due and accrued	199,817,202	10,384	199,806,818
Uncollected premiums and agents' balances in course			
of collection	14,845,663	425,611	14,420,052
Amounts recoverable from reinsurers	2,313		2,313
Other amounts receivable under reinsurance contracts	5,463		5,463
Electronic data processing equipment and software	925,139	486,280	438,859
Furniture and equipment	7,209,742	7,209,742	0
Receivables from parent, subsidiaries and affiliates	9,905,839	9,905,839	0
Aggregate write-ins for other than invested assets	28,194,138	28,136,709	57,429
Totals	<u>\$20,583,7</u> 56,176	\$49,322,416	\$20,534,433,760

# LIABILITIES, SURPLUS AND OTHER FUNDS

Aggregate reserve for life certificates and contracts	\$11,598,768,103
Aggregate reserve for accident and health contracts	287,449,752
Liability for deposit-type contracts	5,810,085,162
Contract claims – Life	48,993,867
Contract claims – Accident and health	460,616
Refunds due and unpaid	1,220,800
Provision for refunds payable in following calendar year-estimated amounts:	
Apportioned for payment	285,511,364
Premium and annuity considerations for life and accident and health contracts	
received in advance including \$606,734 accident and health premiums	6,863,917
Contract liabilities not included elsewhere:	
Interest Maintenance Reserve	47,623,569
Commissions to fieldworkers due or accrued - accident and health	21,119
General expenses due or accrued	18,943,293
Taxes, licenses and fees due or accrued	6,409,942
Amounts withheld or retained by Society as agent or trustee	5,471,442
Amounts held for fieldworkers' account	44,534
Remittances and items not allocated	12,991,546
Miscellaneous liabilities:	
Asset valuation reserve	238,903,537
Payable to subsidiaries and affiliates	8,906
Drafts outstanding	1,125,070
Payable for securities	57,769,175
Payable for securities lending	42,932,807
Aggregate write-ins for liabilities	<u>153,001,496</u>
Total liabilities	<u>\$18,624,600,017</u>
Aggregate write-ins for surplus funds	31,700,000
Unassigned funds	1,878,133,743
Total surplus	\$1,909,833,743
Total liabilities, surplus and other funds	\$20,534,433,760
Total Habilities, Salpius and Otter Rands	920,00 1, 100,700

# STATEMENT OF INCOME

Premiums and annuity considerations for life and accident and health	
contracts	\$1,143,920,419
Considerations for supplementary contracts with life contingencies	28,208,251
Net investment income	919,968,424
Amortization of Interest Maintenance Reserve	20,628,704
Commissions and expense allowances	84,090
Miscellaneous Income:	01,000
Charges and fees for deposit-type contracts	1,744,074
Aggregate write-ins for miscellaneous income	1,037,598
Totals	2,115,591,560
Death benefits	313,614,587
Matured endowments	4,965,275
Annuity benefits	1,538,086
Disability benefits and benefits under accident and health contracts,	2,000,000
including premiums waived \$8,900,383	16,975,763
Surrender benefits and withdrawals for life contracts	163,099,623
Interest and adjustments on contract or deposit-type contract funds	176,269,700
Payments on supplementary contracts with life contingencies	29,627,322
Increase in aggregate reserve for life and accident and health contracts	673,576,495
Totals	1,379,666,851
Commissions on premiums, annuity considerations and deposit-type	
contract funds (direct business only)	111,509,027
General insurance expenses and fraternal expenses	264,568,527
Insurance taxes, licenses and fees	13,635,884
Increase in loading on deferred and uncollected premiums	54,324
Totals	1,769,434,613
Net gain from operations before refunds to members	346,156,947
Refunds to members	278,326,687
Net gain from operations after refunds to members and before realized	
capital gains (losses)	67,830,260
Net realized capital gains (losses) less capital gains tax (excluding	
(\$1,077,488) transferred to the IMR)	45,910,016
Net income	<u>\$113,740,276</u>

SURPLUS ACCOUNT Surplus, December 31 previous year	\$1,835,959,346
Net income from operations	113,740,276
Change in net unrealized capital gains (losses) Change in net unrealized foreign exchange capital gains (losses)	83,542,029 (27,834,325)
Change in nonadmitted assets Change in asset valuation reserve	31,851,366 (33,923,788)
Cumulative effect of changes in accounting principles Aggregate write-ins for gains and losses in surplus	(82,801,209) (10,699,952)
Net change in surplus for the year	73,874,397
Surplus, December 31 current year	\$1,909,833,743

#### PRICING, UNDERWRITING, RESERVE AND LIQUIDITY RISK REVIEW

The Department's Actuarial Unit (Actuaries) performed the review and analysis of reserves and related actuarial items of the Order. The scope of their review encompassed the policy reserves for the life, annuity, and LTC as well as the calculation of the dividend liability. Further refinement of scope within these business segments was performed. The Actuaries participated in the identification and assessment of specific risks and related control and substantive testing related to pricing, underwriting, reserving and liquidity risk areas.

### Pricing and Underwriting Risk

The Actuaries' pricing and underwriting procedures included:

- Review appropriateness of product pricing for the risks assumed.
- Review of the Order's approach for managing its dividend scale and measuring the appropriateness of its premiums.
- Review of LTC business to determine if it is being managed in a reasonable fashion. This review included the Order's pricing determinations.
- Review of several policy contract forms and pricing memoranda for consistency. In particular, review of the Order's latest LTC and term life products.

### Reserving Risk

The Actuaries' reserving procedures included:

 Review of assumptions and methodologies for reasonableness, appropriateness and accuracy for the life and LTC lines of business.

- Confirmation that policies with supplemental or accelerated benefits have been properly separated and reserved for in accordance with statutory accounting principles.
- Confirmation that liability computations are performed correctly and that selected estimates are reasonable for the life, LTC and deposit-type contracts.
- Verification that the Order's statutory reserves make reasonable and adequate provision for the unmatured obligations of the life, annuity and LTC care contracts.
- Performance of a trend analysis of liability items in all major annual statement exhibits.
- Review of actuarial memoranda, contract forms and formula statutory reserves for sample policies
  and agreement of supporting reserve documents to the annual statement exhibits for all material
  liabilities.
- Independent verification and analysis of the approaches, procedures, and methods employed by the Order for its actuarial opinions, supporting memoranda and supplementary reports.
- Testing of formula statutory reserves for a sample of policies covering a range of material products. For each of these sample policies, confirmation that the calculations were accurate and met minimum standards under the Standard Valuation Law and CGS (Sections 38a-78).
- Review of the assumptions and methods used by the Order to perform asset adequacy testing.
- Review of the Order's X-Factor Opinion and supporting actuarial report for conformance with the Valuation of Life Insurance Policies Model Regulation.

### Liquidity Risk

The Actuaries' liquidity procedures included analysis to determine the Order's ability to meet contractual obligations, as they become due, without incurring unacceptable losses due to liquidating assets to meet those obligations.

#### Conclusion

Based on the risk-based assessment and review procedures performed, no material concerns were noted relating to pricing and underwriting risk, reserve risk and liquidity risk.

#### CONCLUSION

The results of this examination disclosed that as of December 31, 2013, the Order had admitted assets of \$20,534,433,760, liabilities of \$18,624,600,017, and surplus of \$1,909,833,743. During the period under examination, admitted assets increased \$4,985,505,336, liabilities increased \$4,723,175,948, and surplus as regards policyholders increased \$262,329,388.

## **SIGNATURE**

In addition to the undersigned, the following members of the Department participated in the examination: Gerald Burke, CFE; Sharon Altieri, CPA; Edna Bosley; Michael Estabrook AFE; Kenneth Roulier, AFE, AES, CISA; William Tatelman, CFE; Andrew Rarus, ASA, MAAA; Debra A. Zadzilko, ASA, MAAA; Tricia A. Davé, FSA, MAAA; and the consulting firm of Jennan.

Roulier, AFE, AES, CISA; William Tatelman, CFE; Andrew Rarus, ASA, MAAA; Debra A. Zadzilko, ASA, MAAA; Tricia A. Davé, FSA, MAAA; and the consulting firm of Jennan.
I, Mark Murphy, CFE, do solemnly swear that the foregoing report of examination is hereby represented to be a full and true statement of the condition and affairs of the subject insurer as of December 31, 2013, to the best of my information, knowledge and belief.
Respectfully submitted,
Mark Murphy, CFE Insurance Certified Supervising Examiner State of Connecticut Insurance Department
State of Connecticut ss
County of Hartford
Subscribed and sworn to before me, Patricia Butier, Notary Public/Commissioner of the Superior Court, on this 19th day of November, 2014  Patricia a Bute.  Notary Public
My Commission Expires September 30, 2018