



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

ORDER ADOPTING REPORT OF EXAMINATION

I, Andrew N. Mais Insurance Commissioner of the State of Connecticut, having fully considered and reviewed the Examination Report (the “Report”) of **ACE Life Insurance Company** (the “Company”) as of December 31, 2021, do hereby adopt the findings and recommendations contained therein based on the following findings and conclusions,

TO WIT:

1. I, Andrew N. Mais, as the 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 Company is a domestic insurer authorized to transact the business of insurance in the State of Connecticut.
3. On March 19, 2023, the verified Report of the Company was filed with the Connecticut Insurance Department (“Insurance Department”).
4. In accordance with Section 38a-14(e)(3) of the CGS, the Company was afforded a period of thirty (30) days within which to submit to the Insurance Department a written submission or rebuttal with respect to any matters contained in the Report.
5. On March 24, 2023, the Company 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 Company hereby is adopted as filed with the Insurance Department.
2. That the Company shall comply with all of the recommendations set forth in the Report, and that failure by the Company to so comply shall result in sanctions or administrative action as provided by Title 38a of the CGS.
3. **Section 38a-14(e)(4)(A) of the CGS requires that:**

“The secretary of the board of directors or similar governing body of the entity shall provide a copy of the report or summary to each director and shall certify to the commissioner, in writing, that a copy of the report or summary has been provided to each director.”

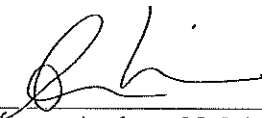
Please address the certification to the commissioner but send[ing] to the care/attention of William Arfanis, Assistant Deputy Commissioner, of the Financial Regulation Division.

4. **Section 38a-14(e)(4)(B) of the CGS requires that:**

“Not later than one hundred twenty days after receiving the report or summary, the chief executive officer or the chief financial officer of the entity examined shall present the report or summary to the entity's board of directors or similar governing body at a regular or special meeting.”

This will be verified by the Insurance Department either through analysis or examination follow-up.

Dated at Hartford, Connecticut, this 24th day of May, 2023



Andrew N. Mais
Insurance Commissioner

Exhibit A

EXAMINATION REPORT

OF THE

ACE LIFE INSURANCE COMPANY
(NAIC # 60348)

AS OF

DECEMBER 31, 2021

BY THE

CONNECTICUT INSURANCE DEPARTMENT



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May 19, 2023

The Honorable Andrew N. Mais
Insurance Commissioner
State of Connecticut Insurance Department
153 Market Street
Hartford, CT 06103

Dear Commissioner Mais:

In compliance with your instructions and pursuant to the requirements of Section 38a-14 of the Connecticut General Statutes (CGS), the undersigned has conducted a financial examination of the condition and affairs of the

ACE LIFE INSURANCE COMPANY

(hereinafter referred to as the Company or Ace Life), a capital stock corporation incorporated under the laws of the State of Connecticut and having its statutory home office located at Two Stamford Plaza, Stamford, CT. The report of such examination is submitted herewith.

ACE LIFE INSURANCE COMPANY

SCOPE OF EXAMINATION

The previous examination of the Company was conducted as of December 31, 2016. The current examination, which covers the subsequent five year period, through December 31, 2021, was conducted virtually, on a full scope, comprehensive basis, in accordance with the procedures outlined in the National Association of Insurance Commissioners (NAIC) Financial Examiners Handbook (the Handbook) by the Connecticut Insurance Department (the Department).

As a part of the examination planning procedures, the Department reviewed the following documentation submitted by the Company:

- The 2017 through 2021 statutory-basis audit reports by Pricewaterhouse Coopers, LLP (PwC), the Company's independent certified public accountants;
- Management's Discussion and Analysis for years 2017 through 2021;
- The 2017 through 2021 Annual Statements filed with the Department;
- Documentation supporting internal control processes and/or testing in 2021, or earlier if applicable and available;
- Minutes of the Board of Directors (Board), Committees to the Board, custodial agreements, and other documents related to significant transactions that require prior approval, or requests for deviations from the NAIC Accounting Practices and Procedures Manual; and
- A review of the statutory audit opinions, which indicated no material concerns, with respect to financial condition or regulatory compliance issues.

A comprehensive review was made of the pre-examination memorandum and other documents provided by or submitted to the Financial Analysis Unit of the Division. Examination Jumpstart and other financial reports obtained from the NAIC database were also reviewed.

Work papers prepared by PwC, as of December 31, 2021, in connection with their annual statutory audits, were reviewed and relied upon to the extent deemed appropriate.

We conducted our examination in accordance with the Handbook. The Handbook requires that we plan and perform the examination to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the Company and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurers surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination, an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

This examination report includes significant findings of fact, and general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not

ACE LIFE INSURANCE COMPANY

included within the examination report, but separately communicated to other regulators and/or the company.

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

HISTORY

The Company was incorporated in New Jersey on May 20, 1965, as American Eagle Life Insurance Company, and commenced business on August 31, 1965.

Effective December 31, 1974, the Company was acquired by United States Fire Insurance Company, a subsidiary of Crum and Forster Holding, Inc. The name was changed to Crum and Forster Life Insurance Company on June 26, 1978.

On December 12, 1979, the Company was acquired by Charter Security Life Insurance Company, a Louisiana company. The name was changed to Charter Security Life Insurance Company on March 11, 1980.

Metropolitan Life Insurance Company acquired the Company on January 10, 1985, and changed the name to Metlife Security Insurance Company on June 20, 1985.

Swiss Reinsurance Company acquired the Company on January 31, 1991, and changed the name to Alpine Life Insurance Company on June 21, 1991.

The Company was acquired by Hartford Life and Accident Insurance Company (HLAC) on December 21, 1994.

On November 23, 1998, the Company re-domesticated from New Jersey to Connecticut and changed its name to Hart Life Insurance Company (Hart Life), effective December 22, 1999.

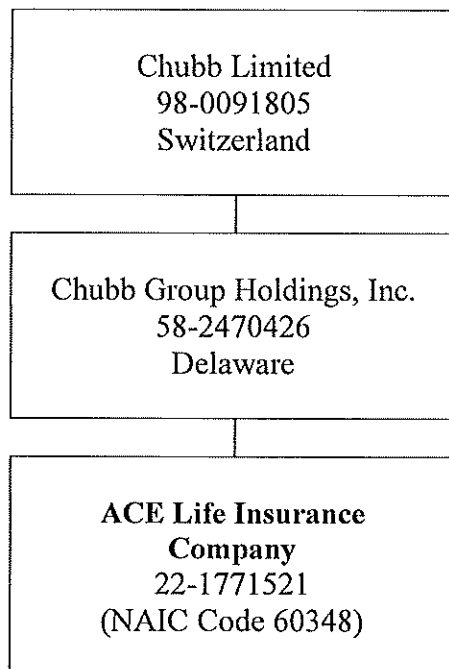
On April 28, 2006, HLAC sold its 100% interest in Hart Life to ACE Group Holdings, Inc. (ACE Group). Hart Life was renamed ACE Life Insurance Company, effective May 10, 2006, upon an execution amending and restating its articles of incorporation.

Effective January 15, 2010, ACE Group decided to discontinue assuming new traditional life reinsurance business underwritten through Ace Life, as it was not strategically core to ACE Group's overall business plan.

On January 14, 2016, ACE Limited completed the acquisition of the Chubb Corporation. Subsequent to the acquisition, ACE Limited changed its name to Chubb Limited.

ACE LIFE INSURANCE COMPANY

ORGANIZATION CHART



The Company is 100% owned by Chubb Group Holdings Inc. and is part of a holding company structure in which the ultimate parent company, Chubb Limited, is publicly traded.

MANAGEMENT AND CONTROL

The Company is a member of an insurance holding company system as defined in Sections 38a-138 of the Connecticut Insurance Regulations and Section 38a-135 of the CGS.

The bylaws of the Company require an annual meeting of stockholders to be held for the election of directors at such date, time and place, either within or without the State of Connecticut, as may be designated by resolution of the Board.

Special meetings of stockholders may be called at any time by the Chairman of the Board (Chairman), Vice Chairman of the Board (Vice Chairman), if any, the President, a Vice President, or the Board.

At each meeting of stockholders, except where otherwise provided by law, or the certificate of incorporation, or the bylaws, the holders of a majority of the outstanding shares of each class of stock entitled to vote at the meeting, present in person or by proxy, shall constitute a quorum.

The Board shall consist of one or more members, the number thereof to be determined from time to time by resolution of the Board. Directors need not be stockholders. At the first annual meeting of stockholders and at each annual meeting thereafter, the stockholders shall elect directors, each

ACE LIFE INSURANCE COMPANY

to hold office until the next succeeding annual meeting or until his successor is elected and qualified or until his earlier resignation or removal. Regular meetings of the Board may be held at such places within or without the State of Connecticut and at such times as the Board may from time to time determine.

Special meetings of the Board may be held at any time or place within or without the State of Connecticut, whenever called by the Chairman, if any, by the Vice Chair, if any, by the President, by a Vice President, or by two or more members of the Board.

Directors serving the Company at December 31, 2021, were as follows:

<u>Name</u>	<u>Title and Principal Business Affiliation</u>
Michael H. Buthe	Chief Investment Officer, Chubb Asset Management, Inc.
Michael R. Hoag	President & Chairman, Ace Life
Annette M. Donselaar	Secretary & General Counsel, Chubb Group

The Board may, by resolution passed by a majority of the whole Board, designate one or more committees, each committee to consist of two or more of the directors of the Company. As of December 31, 2021, the Company did not have any committees. Ace Life's ultimate parent company, Chubb Limited, has an Audit Committee consisting of five (5) members of the Board of Directors, each of whom is independent of Chubb Limited and its management.

Directors serving the Chubb Limited Audit Committee at December 31, 2021, were as follows:

<u>Name</u>	<u>Title and Principal Business Affiliation</u>
Robert W. Scully	Director and Chairman, Retired, Morgan Stanley
Theodore E. Shasta	Director, Retired, Wellington Management Company
David H. Sidwell	Director, Retired, Morgan Stanley
Kathy Bonanno	Director, Business Finance Officer, Google Cloud
Luis Téllez	Director, Former Chairman and Chief Executive Officer, Mexican Stock Exchange

Officers serving the Company at December 31, 2021, were as follows:

<u>Name</u>	<u>Title</u>
Michael R. Hoag	President & Chairman
Joseph C. Forrest	Treasurer & Chief Financial Officer
Annette M. Donselaar	Secretary & General Counsel

ACE LIFE INSURANCE COMPANY

RELATED PARTY AGREEMENTS

The Company is a party to various related party transaction agreements. The material agreements are as follows:

Administrative Services Agreement

The Company has an Administrative Services Agreement with an affiliate, ACE American Insurance Company to provide facilities, property, equipment, accounting, tax and auditing, payroll, reinsurance recovery and other similar administrative and operational functions to the Company on a cost expense allocation basis.

Investment Advisory Services Agreement

The Company has an Investment Advisory Services Agreement with Chubb Asset Management, Inc. (CAM) regarding the management of the Company's assets by CAM. The Company is charged a management fee based on the average market value of the invested asset portfolio. The investment objectives and a statement of the restrictions on the investment of the assets of the Company are included in the agreement.

Tax Allocation Agreement:

The Company entered into a Tax Allocation Agreement with Chubb Group Holdings, Inc., and the subsidiaries of its principal shareholder group, to file a consolidated U.S. federal income tax return. The tax sharing allocation agreement provides that any subsidiary having taxable income will pay a tax liability equivalent to what that subsidiary would have paid if it had filed a separate federal income tax return for the year. A subsidiary that would result in a tax loss would receive the benefit resulting from such loss.

INSURANCE COVERAGE

The Company is covered by a financial institution fidelity bond insured by National Union Fire Insurance Company of Pittsburgh, Pa, an American International Group, Inc. (AIG) insurance subsidiary. The corporate fidelity bond provides coverage for loss resulting directly from dishonest or fraudulent acts committed by an employee, acting alone or in collusion with others, with a single loss limit of liability of \$10 million, a single loss liability deductible of \$5 million and an aggregate limit of liability of \$6 million.

The aggregate limit of liability provides coverage which exceeds the suggested minimum limits of insurance pursuant to the Handbook.

TERRITORY AND PLAN OF OPERATION

The Company is licensed to write life and accident and health (A&H) insurance on a reinsured basis in all states, with the exception of New York and the District of Columbia.

ACE LIFE INSURANCE COMPANY

The Company did not write any direct business during the examination period. Effective January 15, 2010, the Company is in run-off. The Company has no current plans to sell new business.

REINSURANCE

At December 31 2021, the Company's liabilities consisted of three yearly renewable term (YRT) reinsurance treaties on ordinary life insurance and one coinsurance treaty. These liabilities relate nearly entirely to Jefferson Pilot Financial Life and Lincoln National Life (Lincoln acquired Jefferson Pilot in 2006), collectively referred to as Lincoln. During 2019, Ace Life and Lincoln agreed to an increased premium rate adjustment of 8%.

As a result of the Company notifying ceding companies of a 25% rate increase due to poor mortality experience on the underlying reinsured business in 2017, a majority of the Company's ceding companies elected to recapture its YRT business reinsured by the Company. The recapture activity had a negative impact on the Company's net income as reductions in reinsurance premium revenues were greater than the corresponding reductions in death benefits and reserve releases related to the recapture business.

In 2019, a financially significant cedent recaptured its reinsurance business assumed by the Company, causing a negative impact on the Company's financial operations similar to that of the 2017 recapture activity.

Assumed Reinsurance

The Company has amended or terminated existing contracts with its reinsurers and cedants, but has not entered into any new contracts subsequent to the business being put into run-off in 2010. The Company's assumed block of reinsurance business consists almost entirely of YRT reinsurance on ordinary life insurance. The majority of those treaties cover permanent plans of insurance, including whole life, universal life and variable universal life. That business is assumed nearly entirely from Lincoln National Life Insurance Company and Farmers New World Life Insurance Company, non-affiliated, U.S insurance companies. The Farmers New World Life reinsurance treaty, effective January 1, 2007, includes coinsurance on a small subset of level term insurance on insured lives rated as substandard. Reinsurance premiums on this business is payable annually in arrears on a fully earned basis.

Retroceded Reinsurance

Effective October 1, 2008, the Company amended the Automatic Coinsurance Retrocession Agreement with ACE Tempest Life Reinsurance, Ltd. (ATLRBDA), an affiliated, unauthorized reinsurer. In 2016, ATLRBDA's name was changed to Chubb Tempest Life Reinsurance Ltd. (Chubb Tempest). The Company is the beneficiary to a letter of credit maintained by Chubb Tempest to cover the reserve credit provided by Chubb Tempest and other unauthorized reinsurers. The Company retains 20% of each individual or joint life risk up to a maximum of \$500,000 of exposure per life for business assumed prior to October 1, 2008, or \$1 million of exposure per life for business assumed after September 30, 2008. That business is ceded on an 80% coinsurance basis to Chubb Tempest, up to a maximum amount per life, varying by issue age and substandard

ACE LIFE INSURANCE COMPANY

rating. The amounts remaining in excess of the coverage provided by the Chubb Tempest coinsurance arrangement are retroceded on an excess YRT basis to a pool of non-affiliated retrocessionaires.

INFORMATION TECHNOLOGY CONTROLS

The Department performed a risk-based assessment and review of IT General Controls (ITGC's) in accordance with NAIC requirements as outlined in the Handbook. The guidance and direction used to perform the review of the ITGC's was derived from Exhibit C Part One – Information Technology Planning Questionnaire (ITPQ) and Exhibit C - Part Two – Information Technology Work Program (collectively Exhibit C). A limited scope review was conducted on the Company's responses to the ITPQ, and an evaluation of certain controls within the IT environment were tested to assess whether the selected controls were designed effectively and were functioning properly.

The evaluation of IT controls focused on the following areas: management and organizational governance; data processing infrastructure; program change controls; system development controls; logical and physical security; and business continuity plans.

Based upon the risk-based assessment and limited scope review, it was determined that the controls over the outsourced TAI system were determined to be effective, and as such, reliance was placed on these IT controls and determined to be effective.

ACCOUNTS AND RECORDS

The Company utilizes PeopleSoft as its general ledger system and Sovos Statutory Reporting Software, to assist in the preparation of its statutory statements. The Company's primary data processing functions have been outsourced to LOGIQ3, who utilize the TAI system to process the Company's reinsurance transactions and report financial information to PeopleSoft.

General ledger account balances were reconciled and traced to appropriate asset, liability, and income statement lines on the Annual Statement for 2021.

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FINANCIAL STATEMENTS

The following statements represent the Company's financial position, as filed by the Company, as of December 31, 2021. No adjustments were made to surplus as a result of the examination.

ASSETS

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$24,086,739		\$24,086,739
Cash, cash equivalents and short-term investments	6,677,718		6,677,718
Receivable for securities	894		894
Investment income due and accrued	88,442		88,442
Premiums and consideration Uncollected premiums and agents' balances in the course of collection	(3,065,233)		(3,065,233)
Reinsurance			
Amounts recoverable from reinsurers	8,907,755		8,907,755
Other amounts receivable under reinsurance contracts	319,775		319,775
Aggregate write-ins for other than invested assets	84,154	\$84,154	0
Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Amounts	37,100,244	84,154	37,016,090
From Separate Accounts, Segregated Accounts and Protected Cell Amounts			
Totals	<u>\$37,100,244</u>	<u>\$84,154</u>	<u>\$37,016,090</u>

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LIABILITIES, SURPLUS AND OTHER FUNDS

Aggregate reserve for life contracts	\$19,807,684
Contract claims:	
Life	1,541,382
Interest Maintenance Reserve	5,854
Commissions and expense allowances payable on reinsurance assumed	34,336
General expenses due or accrued	342,613
Taxes, licenses and fees due or accrued, excluding federal income taxes	112,196
Miscellaneous liabilities:	
Asset valuation reserve	8,134
Payable to parent, subsidiaries and affiliates	7,105,115
Total liabilities excluding Separate Accounts business	28,957,314
From Separate Account statement	0
Total liabilities	28,957,314
Common capital stock	2,500,000
Gross paid in and contributed surplus	51,930,275
Unassigned funds (surplus)	(46,371,499)
Surplus	5,558,776
Total capital and surplus	8,058,776
Total liabilities and surplus	<u>\$37,016,090</u>

ACE LIFE INSURANCE COMPANY

SUMMARY OF OPERATIONS

Premium and annuity considerations for life and accident and health contracts	\$3,877,826
Net investment income	523,833
Amortization of Interest Maintenance Reserve	19,193
Commissions and expense allowances on reinsurance ceded	1,121,046
Totals	5,541,898
Death benefits	6,939,159
Increase in aggregate reserves for life and accident and health contracts	671,019
Totals	7,610,178
Commissions and expense allowances on reinsurance assumed	345,830
General insurance expenses and fraternal expenses	912,815
Insurance taxes, licenses and fees, excluding federal income taxes	362,450
Totals	9,231,273
Net gain from operations before dividends to policyholders and federal income taxes	(3,689,375)
Dividends to policyholders	0
Net gain from operations after dividends to policyholders and before federal income taxes	(3,689,375)
Federal and foreign income taxes incurred (excluding tax on capital gains)	0
Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or (losses)	(3,689,375)
Net realized capital gains (losses)	0
Net income	\$(3,689,375)
CAPITAL AND SURPLUS	
Capital and surplus, December 31, prior year	\$8,711,922
Net income	(3,689,375)
Change in nonadmitted assets	34,196
Change in asset valuation reserve	2,033
Surplus adjustment:	
Paid in	3,000,000
Net change in capital and surplus for the year	(653,146)
Capital and surplus, December 31, current year	<u>\$8,058,776</u>

AGGREGATE RESERVE FOR LIFE CONTRACTS

\$19,807,684

CONTRACT CLAIMS: (LIFE)

\$1,541,382

The Department conducted an assessment of the Company's reserving, reinsurance, liquidity, and pricing risks, as of December 31, 2021. Consistent with the risk focused surveillance approach to the examination, the Department reviewed and relied upon analyses and tests documented by the Company and the Company's independent auditors. Reviews of the Company's primary lines of business were conducted by the Department to determine whether the Company's reserves were established in accordance with minimum standards for the valuation of liabilities specified in the Actuarial Guidelines and applicable Actuarial Standards of Practice. In performing the reserve review and analysis, the Department conducted the following:

ACE LIFE INSURANCE COMPANY

- Reviewed and analyzed statutory Annual Statements for 2020 and 2021;
- met with Company management to understand the business of the Company, its procedures governing actuarial calculations, its approach to risk management, and its likely areas of financial and business risk;
- reviewed tests performed by the Company's actuaries and its independent auditors, and performed independent supplemental reserve calculation's;
- reviewed experience study information compiled and provided by the Company in support of the major assumptions used in the asset to liability analysis; and
- reviewed and analyzed the Company's Statement of Actuarial Opinion and Actuarial Memorandum for the years covered under the examination.

Assessment of Reserve Risk

The Department conducted a review to form a conclusion regarding the risk that actual losses or other contractual payments reflected in the corresponding reserves were greater than the carried liabilities. For some products or exposures, this risk includes a consideration that reserves plus future revenue, less expenses, will be insufficient to pay future benefits. The Department conducted a review of internal controls regarding the claim liability and reserving processes. Various tests were performed to verify the appropriateness of the processes and the actual calculations for the policy reserves, claim reserves and the contract claims liabilities. The Department verified that the reported reserves and liabilities are consistent with those calculated by the Company's actuaries, and the results of their analysis show that the reported liability is sufficient to cover the expected future claims.

Assessment of Reinsurance Arrangements

A review of key reinsurance treaties and other related Company descriptions of its significant assumed and ceded reinsurance agreements was performed and compared to Schedule S of the Company's annual statement. The review also included an evaluation of reinsurance reserve implications. Reinsurance agreements providing significant coverage and material reserve credits were evaluated to ensure compliance with risk transfer requirements.

Assessment of Liquidity Risk

The Department conducted testing to form a conclusion regarding the ability of the Company to meet contractual obligations as they become due because of an inability to liquidate assets or obtain adequate funding without incurring unacceptable losses. This may arise with the occurrence of an event such that the insurer will not have enough cash resources or liquid assets to meet its cash obligations. Based on a review of the Actuarial Memorandum and other analysis of the Company's assets and liabilities, the Department concluded that, with continued capital support from its parent, liquidity risk does not appear to be a major concern for the Company.

Assessment of Premium Pricing Risk:

The Department conducted testing to form a conclusion regarding the development and rationale of premium pricing adjustments to determine whether assumed reinsurance premium is adequate, and analysis conducted on claim development supports premium rate adjustments on appropriate insurance products.

ACE LIFE INSURANCE COMPANY

Conclusion

Based upon the risk focused assessment and review, no material findings were noted which affected the Company's reserving, liquidity, reinsurance, and premium pricing risks.

COMMON CAPITAL STOCK \$2,500,000

The common capital stock of the Company consisted of 10,000 authorized and issued shares having a par value of \$250 per share. All shares are owned by Chubb Group Holdings Inc., which is wholly owned by Chubb Limited, the ultimate parent company.

GROSS PAID IN AND CONTRIBUTED SURPLUS \$51,930,275

The Company's parent paid the following capital contributions to the Company during the examination period:

Year	Contribution Amount
2018	\$4,000,000
2019	\$3,000,000
2020	\$2,000,000
2021	\$3,000,000

UNASSIGNED FUNDS (SURPLUS) \$(46,371,499)

The Company reported a net loss from operations in each year covered under the examination period. The Company paid no dividends during the examination period.

CONCLUSION

The results of this examination disclosed that, as of December 31, 2021, the Company reported net admitted assets of \$37,016,090, liabilities of \$28,957,314, and surplus of \$8,058,776. During the period under examination, admitted assets decreased \$14,690,731, liabilities decreased \$14,079,561, and surplus as regards policyholders decreased \$611,170.

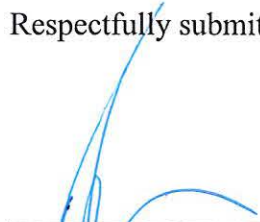
ACE LIFE INSURANCE COMPANY

SIGNATURE

In addition to the undersigned, the following members of the Department participated in the examination: William Arfanis, CFE; Wanchin W. Chou, FCAS, MAAA, CPCU, CSPA; Manuel Hidalgo, FSA, MAAA; Lei Rao-Knight, FSA, MAAA; Robert Linnell, CFE, and Brandon Ormsby.

I, Thomas H. Corrigan, CFE, solemnly swear that the foregoing report on examination is hereby represented to be a full and true statement of the condition and affairs of the subject insurer as of December 31, 2021, to the best of my information, knowledge and belief.

Respectfully submitted,




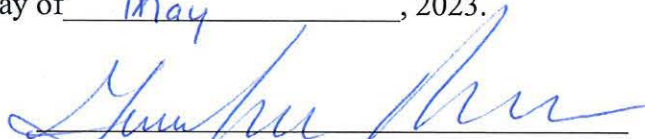
Thomas H. Corrigan, CFE
Examiner-In-Charge
State of Connecticut
Insurance Department

State of Connecticut

ss. Hartford

County of Hartford

Subscribed and sworn to before me, 
Notary Public on this 19 day of May, 2023.



Notary Public

My Commission Expires June 30, 2026

