NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES

FINANCIAL CONDITION REPORT ON EXAMINATION

OF THE

VANTIS LIFE INSURANCE COMPANY OF NEW YORK

CONDITION:	DECEMBER 31, 2018
DATE OF REPORT:	MAY 11, 2020

NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES

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AS OF

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EXAMINER:	MESKEREM BELAY

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Andrew M. Cuomo
Governor

Linda A. Lacewell
Superintendent

June 10, 2020

Honorable Linda Lacewell
Superintendent of Financial Services
New York, New York 10004

Madam:

In accordance with instructions contained in Appointment No. 31876, dated March 13, 2019, and annexed hereto, an examination has been made into the condition and affairs of Vantis Life Insurance Company of New York, hereinafter referred to as "the Company," at its administrative office located at 200 Day Hill Road, Windsor, CT 06095. The Company's home office is located at 162 Prospect Hill Road, Brewster, NY 10509.

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 comments contained in this report are summarized below.

- Effective December 31, 2016, Vantis became a member of the Penn Mutual Holding Company System when The Penn Mutual Life Insurance Company ("Penn Mutual"), a Pennsylvania life insurance company, acquired the control of Vantis Life Insurance Company ("Vantis") and its wholly owned subsidiaries for $74.3 million in cash. The acquisition effectuated by merging Welsh Run Corp, a Connecticut corporation and direct, wholly owned subsidiary of Penn Mutual, with and into Vantis, with Vantis being the surviving entity. (See item 3A of this report.)
- The COVID-19 pandemic has disrupted the United States' economy and caused extreme volatility in the financial markets globally in an unprecedented manner. The extent to which COVID-19 may affect the Company's financial condition or results of operations will depend on future developments, including the duration, spread, and intensity of the pandemic. The extent of these future developments is uncertain and not readily determinable as of the date of this report, considering the rapidly evolving landscape. As a result, it is not currently possible to ascertain the overall effect of COVID-19 on the Company's business. (See item 7 of this report.)

2. SCOPE OF EXAMINATION

The examination of the Company was a full-scope examination as defined in the National Association of Insurance Commissioners' ("NAIC's") *Financial Condition Examiners Handbook, 2019 Edition* (the "Handbook"). The examination covers the four-year period from January 1, 2015, to December 31, 2018. 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, 2018, 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 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 conducted and coordinated with the examination of the Company's parent, Vantis Life Insurance Company ("Vantis"). The examination was led by the State of Connecticut, with participation from New York. Since the lead and participating state are accredited by the NAIC, both 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 2015 through 2018, by the accounting firm of PricewaterhouseCoopers, LLP (“PwC”). The Company received an unqualified opinion for all years. Certain audit workpapers of the accounting firm were reviewed and relied upon in conjunction with this examination. Effective January 1, 2017, the Company started using the Internal Audit Department of The Penn Mutual Life Insurance Company (“Penn Mutual”). The company is not required to comply with the Sarbanes-Oxley Act of 2002 or the NAIC Model Audit Rule. However, it maintains narratives and flowcharts describing work processes, risks, and controls mitigating those risks. Where applicable, internal audit 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 recommendations contained in the prior report on examination. The results of the examiner’s review are contained in item 8 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 matters which require explanation or description.

3. DESCRIPTION OF COMPANY

A. History

The Company was incorporated as a stock life insurance company under the laws of the State of New York on March 1, 2007, and was licensed and commenced business on January 23, 2009. Initial resources of $6,400,000, consisting of common capital stock of $2,000,000 and paid in and contributed surplus of $4,400,000, were provided through the sale of 20,0000 shares of common stock (with a par value of $100 each) to its parent.

Effective December 31, 2016, Vantis became a member of the Penn Mutual Holding Company System when Penn Mutual, a Pennsylvania life insurance company, acquired the control of Vantis and its wholly owned subsidiaries for $74.3 million in cash. The acquisition effectuated by merging Welsh Run Corp, a Connecticut corporation and direct, wholly owned subsidiary of Penn Mutual, with and into Vantis, with Vantis being the surviving entity.

Effective April 4, 2020, the Company changed its name to The Penn Insurance and Annuity Company of New York.

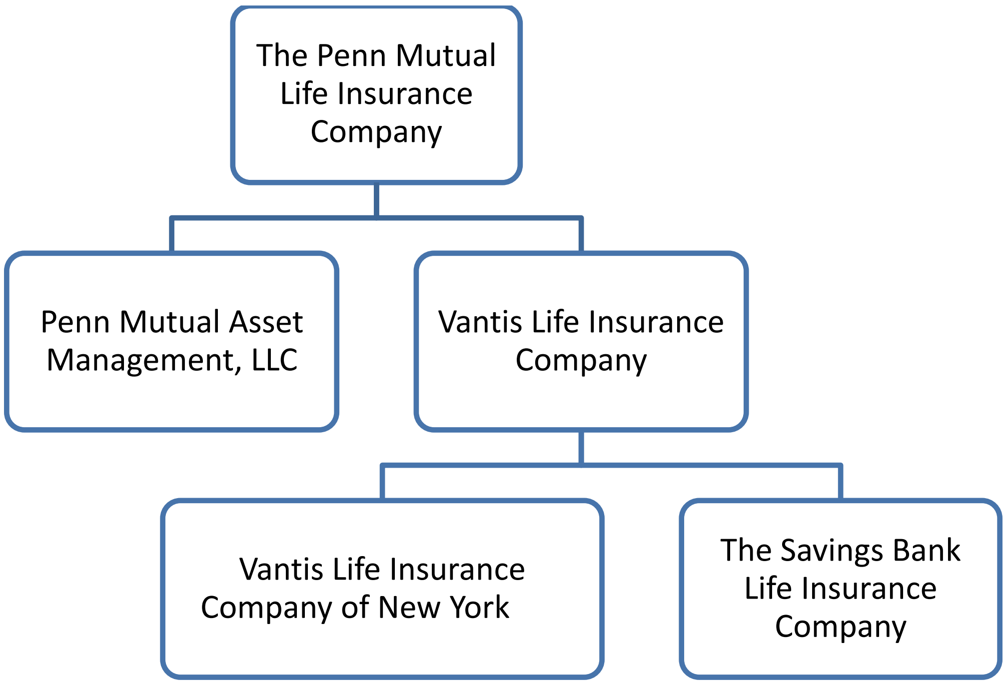
B. Holding Company

The Company is a wholly owned subsidiary of Vantis, a Connecticut life insurance Company. The ultimate parent of the Company is Penn Mutual, a Pennsylvania mutual life insurance company.

Vantis has a net worth maintenance agreement with the Company. Under this agreement, Vantis agrees to cause the Company to have at all times, during the term of the agreement, the greater of a capital and surplus of $6,000,000 or the amount of capital and surplus sufficient for the Company to maintain a risk based capital level at 300% above the authorized control level as defined by the New York Insurance Law. In December 2015, 2016, and 2017, Vantis respectively contributed $275,000, $475,000, and $18,450,000 to the Company.

C. Organizational Chart

An organization chart reflecting the relationship between the Company and significant entities in its holding company system as of December 31, 2018, follows:



D. Service Agreements

The Company had two service agreements in effect with affiliates during the examination period.

Type of Agreement and Department File Number	Effective Date	Provider of Services	Recipient of Services	Specific Services Covered	Expense* For Each Year of the Examination
Underwriting Management and administrative Service Agreement File No. 37858	01/23/ 2009	Vantis	The Company	Underwriting duties, claims services, actuarial services, policyholder services, accounting and certain other administrative functions	2015 $(336,534) 2016 $(379,243) 2017 $(481,591) 2018 $(923,730)
Investment Management Agreement File No. 54472	05/01/2017	Penn Mutual Asset Management, LLC	The Company	Manage the investment and reinvestment of the investment assets and to provide other related investment management and administrative services	2015 $ 0 2016 $ 0 2017 $(46,269) 2018 $(117,969)

*Amount of Expense Incurred by the Company

The Company participates in a federal income tax allocation agreement with its parent company, Vantis.

E. Management

The Company's by-laws, amended and restated as of July 5, 2017, provide that the board of directors shall be comprised of not less than 7 and not more than 11 directors. At the annual meeting of the stockholders held in March of each year, directors are elected to hold office until the next succeeding annual meeting and until such director's successor has been selected and qualified or until such director's earlier death, resignation, or removal. As of December 31, 2018, the board of directors consisted of seven members. Meetings of the board are held annually on the fourth Friday of March.

The seven board members and their principal business affiliation, as of December 31, 2018, were as follows:

Name and Residence	Principal Business Affiliation	Year First Elected
Suzan T Deakins Berwyn, Pennsylvania	Executive Vice President, Chief Financial Officer and Treasurer The Penn Mutual Life Insurance Company	2016
Andreane B Frazier* Baldwin, New York	Chief Executive Officer and Head of Vision Brand myWorth, LLC	2017
David M O' Malley Ambler, Pennsylvania	President and Chief Operating Officer The Penn Mutual Life Insurance Company	2016
Eileen C McDonnell Doylestown, Pennsylvania	Chairman and Chief Executive Officer The Penn Mutual Life Insurance Company	2016
Nina M Mulrooney Philadelphia, Pennsylvania	Executive Vice President, Governance and Auditor The Penn Mutual Life Insurance Company	2017
Scott E Smith South Windsor, Connecticut	Executive Vice President, Chief Operating Officer and Corporate Secretary Vantis Life Insurance Company of New York	2013
Peter L Tedone Simsbury, Connecticut	President and Chief Executive Officer Vantis Life Insurance Company of New York	2009

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

The board of directors of Penn Mutual fulfils the independence requirement in accordance with Section 1202(b)(3) of the New York Insurance Law.

Mr. Tedone retired in January 2019 and was replaced by Mr. Raymond G. Caucci.

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, 2018:

Name	Title
Peter L. Tedone	President and Chief Executive Officer
Scott E. Smith*	Executive Vice President, Chief Operating Officer and Corporate Secretary
Gail E. Lataille	Senior Vice President, Treasurer and Chief Financial Officer
Bruce A. Friedland	Senior Vice President, Chief Actuary and Chief Product Officer
Craig D. Simms	Senior Vice President, Chief Marketing Officer

*Designated consumer services officer per Section 216.4(c) of 11 NYCRR216 (Insurance Regulation 64)

In January 2019, Mr. Tedone retired from the Company; Mr. Raymond G. Caucci became Chairman and Chief Executive Officer; and Mr. Smith became President, Chief Operating Officer and Corporate Secretary. In addition, Mr. Simms resigned from the Company in July 2019.

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 only licensed to transact business in New York. In 2018, all life premiums and annuity considerations were received from New York.

A. Statutory and Special Deposits

As of December 31, 2018, the Company had $480,000 (par value) of New York City General Obligation Bonds on deposit with the State of New York, its domiciliary state, for the benefit of all policyholders, claimants and creditors of the Company.

B. Direct Operations

The Company principal line of business sold during the examination period is individual life insurance. The Company primarily sells individual whole life, single premium whole life, and guaranteed final expense life insurance products, as well as simplified issue and fully underwritten level term and single premium children’s term insurance products. The Company's level term products can be converted to permanent life insurance without evidence of insurability.

During 2017, the Company began selling fixed deferred annuity products to the individual annuities market. These products are non-participating single and flexible premium deferred annuities issued on a qualified and non-qualified basis.

Prior to August 2019, the Company’s agency operations were conducted on a general agency, branch office, and a direct response basis. The Company primarily marketed its products through community and regional banks and credit unions. However, in August 2019, the Company decided to no longer distribute its products through financial institutions and, instead, focus its efforts solely on the direct-to-consumer channel. The Company continued to accept new business applications from financial institutions up until the close of business August 2, 2019, and will continue to provide customer service to all its existing policyholders.

C. Reinsurance

As of December 31, 2018, the Company had reinsurance treaties in effect with three companies, all of which were authorized or accredited. The Company’s life business is reinsured on a coinsurance and yearly renewable term bases. Reinsurance is provided on an automatic basis.

The maximum retention limit for individual life contracts is $300,000. The total face amount of life insurance ceded, as of December 31, 2018, was $422,128,382, which represents 66% of the total face amount of life insurance in force.

5. SIGNIFICANT OPERATING RESULTS

Indicated below is significant information concerning the operations of the Company during the period under examination as extracted from its filed annual statements. Failure of items to add to the totals shown in any table in this report is due to rounding.

The following table indicates the Company's financial growth (decline) during the period under review:

	December 31, 2014	December 31, 2018	Increase (Decrease)
Admitted assets	$ 9,794,657	$168,787,284	$158,992,627
Liabilities	$ 3,749,202	$148,946,226	$145,197,024
Common capital stock	$ 2,000,000	$ 2,000,000	$ 0
Gross paid in and contributed surplus	6,454,516	25,654,516	19,200,000
Unassigned funds (surplus)	(2,409,061)	(7,813,458)	(5,404,397)
Total capital and surplus	$ 6,045,455	$ 19,841,058	$ 13,795,603
Total liabilities, capital and surplus	$ 9,794,657	$168,787,284	$158,992,627

The significant increase in assets and liabilities during the period under review was due primarily to year-over-year increases in bonds and annuity reserves. The most significant increase occurred in 2017 in which bonds increased by $111.65 million and annuity reserves increased by $115.2 million. The Company started selling fixed deferred annuities in 2017 with annuity deposits totaling $119.5 million.

The Company's invested assets, as of December 31, 2018, mainly comprised bonds (96%). The Company's entire bond portfolio, as of December 31, 2018, comprised investment grade obligations.

The following indicates, for each of the years listed below, the amount of life insurance issued and in force by type (in thousands of dollars):

	Individual Whole Life		Individual Term	
Year	Issued	In Force	Issued	In Force
2015	$28,353	$ 91,557	$101,540	$348,946
2016	$19,532	$100,671	$ 90,979	$393,252
2017	$13,375	$102,431	$ 98,779	$446,458
2018	$17,359	$110,662	$139,766	$530,327

The Company's distribution strategy in New York focused on the sale of life insurance products through financial institutions, as such, sales volumes varied from period to period. In 2018, the Company experienced a significant increase in sales from its single premium life insurance business.

The following has been extracted from the Exhibits of Annuities in the filed annual statements for each of the years under review:

	Ordinary			
	2015	2016	2017	2018
Outstanding, end of previous year	0	0	0	1,921
Issued during the year	0	0	1,921	328
Other net changes during the year	(0)	(0)	(0)	(28)
Outstanding, end of current year	0	0	1,921	2,221

The Company began offering individual fixed deferred annuities in 2017. The Company has indicated that it has de-emphasized annuity sales since the big sales in 2017 and that it expects minimal to no annuity sales over the next three years. This is reflected in the decrease in annuity issued in 2018.

The following is the net gain (loss) from operations by line of business after federal income taxes but before realized capital gains (losses) reported for each of the years under examination in the Company's filed annual statements:

	2015	2016	2017	2018
Ordinary:				
Life insurance	$(264,368)	$(624,296)	$ 217,934	$ (609,349)
Individual annuities	0	0	(3,104,030)	(459,870)
Total ordinary	$(264,368)	$(624,296)	$(2,886,096)	$(1,069,219)
Total	$(264,368)	$(624,296)	$(2,886,096)	$(1,069,219)

The increase in net loss from the Company's ordinary life insurance line of business in 2016, compared with 2015, was driven primarily from a significant increase in death benefits. The 2017 increase in net gains was driven by an increase in premiums and decreases in general expenses and federal income taxes, partially offset by an increase in death benefits. Increased sales from the Company's single premium life insurance business in 2017 resulted in a significant increase in premiums during the year, as well as significant increases in reserves, commissions, and general expenses. The net loss reported in 2018 was due to increased death benefits during the year.

The Company started issuing individual fixed deferred annuities in 2017, with deposits of $119.5 million. The surplus strain associated with this growth initiative resulted in the line of business' net loss from operations. In 2018, the Company, unable to get a competitive rate, slowed the growth of its annuities significantly with annuity deposits totaling only $14.9 million. This sales initiative resulted in decreased annuity sales, lower annuity reserves and, in turn, a decrease in net loss from operations in 2018.

6. FINANCIAL STATEMENTS

The following statements show the assets, liabilities, and capital and surplus as of December 31, 2018, as contained in the Company's 2018 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, 2018 filed annual statement.

A. Independent Accountants

The firm of PricewaterhouseCoopers, LLP ("PwC") was retained by the Company to audit the Company's combined statutory basis statements of financial position as of December 31 of each year in the examination period, and the related statutory-basis statements of operations, capital and surplus, and cash flows for the years then ended.

PwC 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	$157,800,612
Stocks:	
Preferred stocks	622,240
Cash, cash equivalents and short-term investments	6,019,452
Contract loans	184,198
Receivable for securities	10,510
Investment income due and accrued	1,440,610
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	67,782
Deferred premiums, agents' balances and installments booked but deferred and not yet due	1,006,494
Net deferred tax asset	93,681
NYDFS Section 206 receivable	1,541,705
Total admitted assets	$168,787,284

C. Liabilities, Capital and Surplus

Aggregate reserve for life policies and contracts	$147,125,649
Contract claims:	
Life	307,130
Premiums and annuity considerations for life and accident and health contracts received in advance	4,580
Contract liabilities not included elsewhere:	
Other amounts payable on reinsurance	34,071
Commissions to agents due or accrued	(3,257)
General expenses due or accrued	112,664
Taxes, licenses and fees due or accrued, excluding federal income taxes	210
Current federal and foreign income taxes	296,280
Remittances and items not allocated	256,609
Miscellaneous liabilities:	
Asset valuation reserve	481,183
Payable to parent, subsidiaries and affiliates	291,585
Unclaimed funds for escheat	39,522
Total liabilities	$148,946,226
Common capital stock	2,000,000
Gross paid in and contributed surplus	25,654,516
Unassigned funds (surplus)	(7,813,458)
Surplus	$ 17,841,058
Total capital and surplus	$ 19,841,058
Total liabilities, capital and surplus	$168,787,284

D. Condensed Summary of Operations

	2015	2016	2017	2018
Premiums and considerations	$3,415,783	$3,873,839	$123,626,233	$22,823,071
Investment income	301,933	337,216	2,240,104	5,924,934
Miscellaneous income	5,100	6,453	24,742	44,568
Total income	$3,722,816	$4,217,508	$125,891,079	$28,792,573
Benefit payments	$ 338,817	$ 650,305	$ 1,418,428	$ 5,433,065
Increase in reserves	1,446,040	1,850,775	119,949,557	20,558,127
Commissions	906,815	821,289	4,597,051	1,295,566
General expenses and taxes	1,317,773	1,448,253	1,603,425	2,171,062
Increase in loading on deferred and uncollected premiums	78,386	2,181	(17,249)	(7,195)
Miscellaneous deductions	0	92,601	195,280	0
Total deductions	$4,087,831	$4,865,404	$127,746,492	$29,450,625
Net gain (loss)	$ (365,015)	$ (647,896)	$ (1,855,413)	$ (658,052)
Federal and foreign income taxes incurred	(100,647)	(23,600)	1,030,683	411,167
Net gain (loss) from operations before net realized capital gains	$ (264,368)	$ (624,296)	$ (2,886,096)	$ (1,069,219)
Net realized capital gains (losses)	0	0	(5,207)	0
Net income	$ (264,368)	$ (624,296)	$ (2,891,303)	$ (1,069,219)

The significant increase in premiums and annuity considerations in 2017, compared with 2016, resulted from the Company's introduction and fast growth of its fixed annuity product during the year, with deposits totaling $119.5 million. The subsequent decrease in 2018 was due to the slow growth of the Company's annuity product, with deposits totaling only $14.9 million.

The variations in the growth of the Company's annuity business, along with the continued growth of the Company's life insurance business, drove the fluctuations in increase in reserves, commissions, general expenses, and increase in loading on deferred and uncollected premiums during the examination period.

The increases in investment income in 2017 and 2018 resulted from the increases in invested assets in those years due to the high volume of annuity sales.

The increases in benefit payments during the examination period were driven primarily by increases in death benefits and life and annuity surrender benefits, particularly in 2017 and 2018.

E. Capital and Surplus Account

	2015	2016	2017	2018
Capital and surplus, December 31, prior year	$6,045,455	$6,015,088	$ 5,892,925	$21,336,019
Net income	$ (264,368)	$ (624,296)	$ (2,891,303)	$ (1,069,219)
Change in net deferred income tax	0	0	169,205	(75,524)
Change in non-admitted assets and related items	(34,204)	40,512	(77,887)	(132,415)
Change in asset valuation reserve	(6,794)	(13,380)	(206,921)	(217,803)
Surplus adjustments:				
Paid in	275,000	475,000	18,450,000	0
Net change in capital and surplus for the year	(30,366)	(122,164)	15,443,094	(1,494,961)
Capital and surplus, December 31, current year	$6,015,088	$5,892,925	$21,336,019	$19,841,058

The increases in “paid in” surplus in 2016 and 2017 reflect the capital contributions received by the Company from its parent, Vantis.

7. SUBSEQUENT EVENTS

In December 2019, a novel strain of coronavirus—COVID-19—was reported in Wuhan, China. The virus has subsequently spread to other parts of the world, including the United States. On March 11, 2020, the World Health Organization declared the COVID-19 outbreak a pandemic, and on March 13, 2020, President Donald J. Trump declared the pandemic a national emergency. The COVID-19 pandemic has disrupted the United States' economy and caused extreme volatility in the financial markets globally in an unprecedented manner.

The extent to which COVID-19 may affect the Company's financial condition or results of operations will depend on future developments, including the duration, spread, and intensity of the pandemic. The extent of these future developments is uncertain and not readily determinable as of the date of this report, considering the rapidly evolving landscape. As a result, it is not currently possible to ascertain the overall effect of COVID-19 on the Company's business.

The Department, along with all insurance regulators and the NAIC, is closely monitoring the evolving situation and the insurance industry through a coordinated effort to assess the effect of the pandemic on various types of insurance, individual insurers, and the insurance industry as a whole.

8. PRIOR REPORT SUMMARY AND CONCLUSIONS

Following are the recommendations contained in the prior report on examination and the subsequent actions taken by the Company in response to each:

Item	Description
A	The examiner recommended that the Company obtain the superintendent's approval prior to accepting future surplus contributions from its parent involving five percent or more of its admitted assets at last year end. The examiner's review indicated that Company filed with and received approval from the Department for surplus contributions from its parent during the period under examination involving five percent or more of its admitted assets at last year end.
B	The examiner recommended that the Company establish and maintain an independent, adequately resourced, and competently staffed internal audit function to provide management with ongoing assessments of the Company's risk management processes and the accompanying system of internal controls. To the extent that audits performed by an affiliate on a functional basis are intended to encompass the activities of the Company, it should be clear from the audit workpapers that Company transactions or activities are specifically included in the samples reviewed by internal audit. This is a repeat recommendation. Effective January 1, 2017, the Company started using the Internal Audit Department of The Penn Mutual Life Insurance Company.

Respectfully submitted,

/s/

Meskerem Belay
Senior Insurance Examiner

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

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

/s/

Meskerem Belay

Subscribed and sworn to before me

this__________ day of ___________________

APPOINTMENT NO. ***31876***

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:*

MESKEREM T. BELAY

as a proper person to examine the affairs of the

VANTIS LIFE INSURANCE COMPANY OF NEW YORK

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

this 13th day of March 2019

LINDA A. LACEWELL
Acting Superintendent of Financial Services

By:

MARK MCLEOD
DEPUTY CHIEF - LIFE BUREAU