



FINANCIAL CONDITION REPORT ON EXAMINATION

OF

FIRST SYMETRA NATIONAL LIFE INSURANCE COMPANY

OF

NEW YORK

AS OF DECEMBER 31, 2020

EXAMINER:
DATE OF REPORT:

PYONG YONG LANDOLL, CFE
MAY 13, 2022

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KATHY HOCHUL
Governor



ADRIENNE A. HARRIS
Superintendent

June 7, 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. 32297, dated August 24, 2021, and annexed hereto, an examination has been made into the condition and affairs of First Symetra National Life Insurance Company of New York, hereinafter referred to as "the Company". The Company's home office is located at 420 Lexington Ave., Suite 300, New York, NY 10170. 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 violation contained in this report is summarized below.

- The Company violated Section 1505(d)(3) of the New York Insurance Law by receiving investment management services from its parent on a regular and systematic basis without notifying the Superintendent in writing of its intention to enter into any such transaction. (See item 3D 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") *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, 2020, 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 called by the Iowa Department of Insurance ("Iowa") in accordance with the Handbook guidelines, through the NAIC's Financial Examination Electronic Tracking System. Iowa served as the lead state with New York serving as a participating state. Since the lead and participating state are all 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 2016 through 2019, by the accounting firm of Ernst & Young, LLP (“EY”). The Company changed its auditing firm to KPMG, LLP (“KPMG”), the external auditor of the Company’s ultimate parent, Sumitomo Life Insurance Company (“SL”), for the year 2020. 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. The Company has an internal audit department which was given the task of assessing the internal control structure and compliance with the Model Audit Rule (“MAR”). Where applicable, MAR 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 financial condition 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 was incorporated as a stock life insurance company under the laws of New York on April 23, 1987, and was licensed and commenced business on January 2, 1990. Initial resources of \$8,500,000, consisting of common (preferred) capital stock of \$2,000,000 and paid in and contributed surplus of \$6,500,000, were provided through the sale of 20,000 shares of common stock (with a par value of \$100 each) for \$425 per share. SL, a Japanese mutual life insurer, acquired Symetra Financial Corporation (“SFC”) in accordance with a merger agreement dated August 11, 2015. Effective February 1, 2016, the acquisition was completed and SFC became a wholly owned subsidiary of SL.

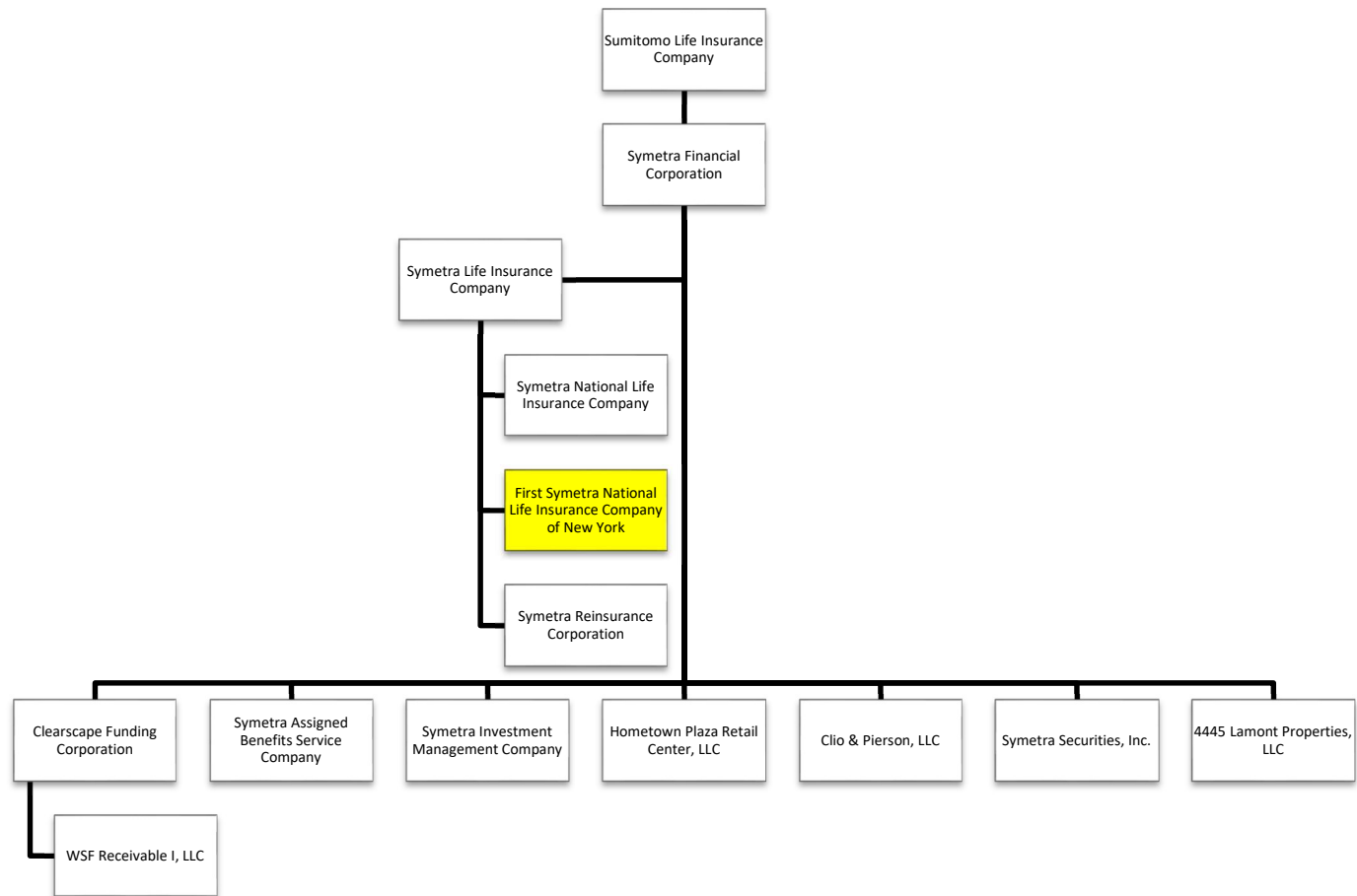
On November 28, 2018, Symetra Life Insurance Company (“SLIC”), the Company’s parent, made a capital contribution of \$25,000,000 to the Company. As of December 31, 2020, the Company’s capital and paid in and contributed surplus were \$2,000,000 and \$85,000,000, respectively.

B. Holding Company

The Company is a wholly owned subsidiary of SLIC, an Iowa domiciled life insurer. SLIC is in turn wholly owned subsidiary of SFC, a Delaware corporation. The ultimate parent of the Company is SL, a mutual company (sougo kaisha) organized under the laws of Japan.

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 five service agreements in effect with affiliates during the examination period.

Type of Agreement and Department File Number	Effective Date	Provider(s) of Service(s)	Recipient(s) of Service(s)	Specific Service(s) Covered	Income/ (Expense)* For Each Year of the Examination
Amended and Restated Administrative Services Agreement File No. 33400	01/01/2005	SLIC	The Company	Services including accounting, data processing, tax, auditing, underwriting, claims processing and procedures, advertising and sales promotional services, functional support (including actuarial services, telecommunication services, legal services, purchasing, and employee relations services), and customer support services as well as providing the Company with the use of certain property, equipment and facilities of SLIC.	2016 \$(4,835,756) 2017 \$(5,450,870) 2018 \$(6,143,038) 2019 \$(8,434,793) 2020 \$(9,373,325)
Investment Management Agreement File No. 49696	01/01/2015 (terminated 02/11/2017)	White Mountains Advisors, LLC ("WMA")	The Company	Advice and services regarding the purchase, sale or other disposition of securities.	01/2016 \$(18,318) (WMA ceased to be an affiliate on 02/01/2016)

Type of Agreement and Department File Number	Effective Date	Provider(s) of Service(s)	Recipient(s) of Service(s)	Specific Service(s) Covered	Income/ (Expense)* For Each Year of the Examination
Intercompany Investment Management Agreement File No. 58456	01/01/2020	Symetra Investment Management Company	The Company	Advice and services regarding the purchase, sale or other disposition of portfolio assets.	2020 \$(2,687,788)
Amended and Restated Intercompany Short-Term Borrowing Agreement, including Amendments No.s 1-3 File No.s 51014A, 53616, 58443, 58250, 59889, 54915, 56428, 59558, 58071	08/05/2015 (Amended 10/13/2016, 01/01/2020 and 09/30/2020)	SLIC	The Company	Intercompany short-term lending for purposes of cash management.	2016 \$ (1,318) 2017 \$(17,998) 2018 \$ (4,020) 2019 \$(54,822) 2020 \$ (6,445)
Principal Underwriting Agreement, including Amendment No. 1 File No. 40640	02/01/1997 (Amended 09/30/2005)	Symetra Securities Inc.	The Company	Underwriting for distribution of variable insurance products of the Company.	N/A - There are no direct expenses or fees charged to the Company for underwriting. The Company pays commission expenses on behalf of the Underwriter as follows: 2016 \$(1,155) 2017 \$(1,100) 2018 \$ (836) 2019 \$ (418) 2020 \$ (418)

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

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

Section 1505(d) of the New York Insurance Law states, in part:

“The following transactions between a domestic controlled insurer and any person in its holding company system may not be entered into unless the insurer has notified the superintendent in writing of its intention to enter into any such transaction at least thirty days prior thereto, or with regard to reinsurance treaties or agreements at least forty-five days prior thereto, or such shorter period as the superintendent may permit, and the superintendent has not disapproved it within such period: . . .

(3) rendering of services on a regular or systematic basis; . . .”

From 2017 through 2019, the Company received investment management services from its immediate parent, SLIC, without notifying the Superintendent of its intention to enter into the transaction at least thirty days prior thereto.

The Company violated Section 1505(d)(3) of the New York Insurance Law by receiving investment management services from its parent on a regular and systematic basis without notifying the Superintendent in writing of its intention to enter into any such transactions at least thirty days prior thereto.

Effective January 1, 2020, the Company entered into an investment management agreement with Symetra Investment Management Company, an affiliate.

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 21 directors. Directors are elected for a period of one year at the annual meeting of the stockholders held in April of each year. As of December 31, 2020, the board of directors consisted of eight members. Meetings of the board are held March, May, and November; however, numerous written actions in lieu of in-person meetings are circulated throughout the remainder of the year.

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>
Tommie D. Brooks Kirkland, Washington	Executive Vice President and Chief Financial Officer First Symetra National Life Insurance Company of New York	2018
Sander M. Levy* New York, New York	Co-Founder and Managing Principal Bridge Growth Partners, LLC	2004
Margaret A. Meister Kirkland, Washington	President First Symetra National Life Insurance Company of New York	2004
Sarah M. Roffey Jewell* Seattle, Washington	Distinguished Fellow, College of the Environment University of Washington	2018
Muneo Sasagawa Bellevue, Washington	Senior Business Liaison II, Symetra Head of International Business Department Sumitomo Life Insurance Company	2019
Jon S. Stenberg Big Stone City, South Dakota	Executive Vice President, Individual Life Division First Symetra National Life Insurance Company of New York	2019
Jacqueline M. Veneziani Seattle, Washington	Senior Vice President, General Counsel and Secretary First Symetra National Life Insurance Company of New York	2018
Robert G. Wolfe* Bellevue, Washington	Principal Windy Point LLC	2016

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

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>
Margaret A. Meister	President
Colleen M. Murphy	Senior Vice President, Controller and Treasurer
Jacqueline M. Veneziani	Senior Vice President, General Counsel and Secretary
Tommie D. Brooks	Executive Vice President and Chief Financial Officer
Chantel L. Balkovetz	Executive Vice President and Chief of Service and Operations
Anne-Marie Diouf	Senior Vice President and Chief Human Resources Officer
Mark E. Hunt	Executive Vice President and Chief Investment Officer
Joel C. Kniesley	Senior Vice President and Chief Information Officer
Harry S. Monti Jr.	Executive Vice President, Benefits Division
Trinity E. Parker	Senior Vice President, Marketing, Communications and Public Affairs
Wesley W. Severin	Executive Vice President, Retirement Division
Jon S. Stenberg	Executive Vice President, Individual Life Division

*Maureen H. Henderson, Senior Vice President and Chief Compliance Officer, is the designated consumer services officer per Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64)

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 New York only. The Company's main product line is individual single premium fixed deferred annuities. The Company began issuing term life insurance in 2005 and medical stop loss insurance in 2006. The Company discontinued issuing variable annuities in March 2007 due to a lack of sales. Although the Company submitted and received approval for a new variable annuity contract in 2007, no new variable products were issued during the examination period. In 2020, all life insurance premiums, accident and health premiums, annuity considerations, and deposit type funds were received from New York. Policies are written on a non-participating basis.

A. Statutory and Special Deposits

As of December 31, 2020, the Company had \$450,000 (par value) of United States Treasury 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's principal lines of business are individual annuities and individual life insurance. The Company also offers group life, group disability income, and group medical stop loss insurance. The Company markets its products through financial institutions, which includes banks and wirehouses, brokerage general agencies, independent marketing organizations, employee benefit brokers and consultants, third-party administrators, worksite specialists, and independent insurance agents. The Company uses financial institutions and brokerage general agents to distribute a significant portion of its annuity products, as well as a small portion of its life insurance policies. The Company also uses independent insurance agents to distribute its individual life and annuity products. Employee benefit brokers and consultants as well as third-party administrators distribute most of the Company's group products.

C. Reinsurance

As of December 31, 2020, the Company had reinsurance treaties in effect with nine companies, all of which were authorized, accredited, or certified. The Company's individual variable annuity, life, accidental death benefits, accident and health, and disability benefits business is reinsured on a coinsurance, and yearly renewable term basis. The Company's group life business is reinsured on a coinsurance and yearly renewable term basis.

The retention limit per life for individual life contracts was \$3,000,000 from November 1, 2013 to March 31, 2017, and \$5,000,000 from April 1, 2017, to the present. The total face amount of life insurance ceded as of December 31, 2020, was \$1,154,224,164 which represents 18.56% of the total face amount of life insurance in force.

The Company did not assume any reinsurance during the period under examination.

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 EY was retained by the Company to audit the Company's combined statutory basis statements of financial position as of December 31st for the years 2016, 2017, 2018, and 2019, and the related statutory-basis statements of operations, capital and surplus, and cash flows for the year then ended. The firm of KPMG was retained by the Company to audit the Company's combined statutory basis statements of financial position as of December 31, 2020, and the related statutory-basis statements of operations, capital and surplus, and cash flows for the year then ended.

EY and KPMG 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	\$2,501,826,587
Mortgage loans on real estate:	
First liens	494,643,128
Cash, cash equivalents and short-term investments	15,486,863
Contract loans	195,138
Investment income due and accrued	19,881,363
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	4,538,893
Deferred premiums, agents' balances and installments booked but deferred and not yet due	95,888
Reinsurance:	
Amounts recoverable from reinsurers	182,798
Other amounts receivable under reinsurance contracts	207,744
Amounts receivable relating to uninsured plans	2,304
Net deferred tax asset	10,986,192
Guaranty funds receivable or on deposit	3,200
New York assessments and other tax receivables	287,733
From separate accounts, segregated accounts and protected cell accounts	\$ <u>290,618</u>
Total admitted assets	<u>\$3,048,628,449</u>

C. Liabilities, Capital and Surplus

Aggregate reserve for life policies and contracts	\$2,822,738,590
Aggregate reserve for accident and health contracts	3,804,340
Liability for deposit-type contracts	32,973,199
Contract claims:	
Life	3,468,618
Accident and health	12,734,810
Premiums and annuity considerations for life and accident and health contracts received in advance	45,632
Contract liabilities not included elsewhere:	
Provision for experience rating refunds	260,683
Commissions to agents due or accrued	506,228
Taxes, licenses and fees due or accrued, excluding federal income taxes	289,812
Current federal and foreign income taxes	1,260,926
Unearned investment income	1,524
Amounts withheld or retained by company as agent or trustee	1,416,252
Remittances and items not allocated	4,269,323
Miscellaneous liabilities:	
Asset valuation reserve	18,651,688
Payable to parent, subsidiaries and affiliates	343,990
Payable for Securities	7,100,000
Accrued interest on policy claims	15,492
From Separate Accounts statement	<u>290,618</u>
 Total liabilities	 <u>\$2,910,171,725</u>
 Common capital stock	 \$ 2,000,000
 Gross paid in and contributed surplus	 85,000,000
Unassigned funds (surplus)	<u>51,456,724</u>
 Surplus	 <u>\$ 136,456,724</u>
 Total capital and surplus	 <u>\$ 138,456,724</u>
 Total liabilities, capital and surplus	 <u>\$3,048,628,449</u>

D. Condensed Summary of Operations

	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Premiums and considerations	\$396,169,265	\$355,823,768	\$553,530,879	\$619,470,364	\$532,025,362
Investment income	51,036,729	61,010,482	69,285,916	88,226,118	94,563,779
Commissions and reserve adjustments on reinsurance ceded	80,805	191,994	51,081	(7,930)	26,245
Miscellaneous income	<u>976,941</u>	<u>1,202,186</u>	<u>1,424,447</u>	<u>1,528,871</u>	<u>1,318,830</u>
Total income	<u>\$448,263,740</u>	<u>\$418,228,430</u>	<u>\$624,292,323</u>	<u>\$709,217,423</u>	<u>\$627,934,216</u>
Benefit payments	\$121,098,089	\$150,585,665	\$181,696,206	\$228,101,114	\$247,649,742
Increase in reserves	301,769,323	230,796,018	404,834,158	436,274,443	351,556,201
Commissions	12,333,393	11,317,198	17,278,388	18,689,576	14,490,959
General expenses and taxes	7,692,242	9,759,795	11,490,648	14,245,988	15,083,430
Increase in loading on deferred and uncollected premiums	23,518	6,744	(16,224)	9,342	(52,712)
Net transfers to (from) Separate Accounts	13,215	(37,620)	(75,991)	(815)	(2,268)
Total deductions	<u>\$442,929,780</u>	<u>\$402,427,800</u>	<u>\$615,207,185</u>	<u>\$697,319,648</u>	<u>\$628,725,352</u>
Net gain (loss)	\$ 5,333,960	\$ 15,800,630	\$ 9,085,138	\$ 11,897,775	\$ (791,136)
Federal and foreign income taxes Incurred	<u>6,216,757</u>	<u>5,999,178</u>	<u>8,099,535</u>	<u>9,247,130</u>	<u>3,835,291</u>
Net gain (loss) from operations before net realized capital gains	\$ (882,797)	\$ 9,801,452	\$ 985,603	\$ 2,650,645	\$ (4,626,427)
Net realized capital gains (losses)	<u>(629,307)</u>	<u>(472,868)</u>	<u>4,688</u>	<u>19,375</u>	<u>(29,078)</u>
Net income	<u>\$ (1,512,104)</u>	<u>\$ 9,328,584</u>	<u>\$ 990,291</u>	<u>\$ 2,670,020</u>	<u>\$ (4,655,505)</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>\$113,687,025</u>	<u>\$112,588,972</u>	<u>\$114,671,891</u>	<u>\$139,168,271</u>	<u>\$142,265,847</u>
Net income	\$ (1,512,104)	\$ 9,328,584	\$ 990,291	\$ 2,670,020	\$ (4,655,505)
Change in net deferred income tax	6,433,560	(3,151,181)	5,962,158	6,716,323	3,496,820
Change in non-admitted assets and related items	(4,097,448)	(896,145)	(5,436,109)	(3,382,125)	856,873
Change in reserve valuation basis	0	(1,275,207)	0	0	0
Change in asset valuation reserve	(1,922,061)	(1,923,132)	(2,019,960)	(2,906,642)	(3,507,311)
Surplus adjustments:					
Paid in	0	0	25,000,000	0	0
Net change in capital and surplus for the year	<u>(1,098,053)</u>	<u>2,082,919</u>	<u>24,496,380</u>	<u>3,097,576</u>	<u>(3,809,123)</u>
Capital and surplus, December 31, current year	<u>\$112,588,972</u>	<u>\$114,671,891</u>	<u>\$139,168,271</u>	<u>\$142,265,847</u>	<u>\$138,456,724</u>

6. SUBSEQUENT EVENTS

Symetra Investment Management Real Estate Holdings, LLC was formed as a limited liability company in Delaware on October 21, 2021, for the purpose of serving as the holding company of Symetra Investment Management Real Estate Investors, LLC.

Symetra Investment Management Real Estate Investors, LLC was formed as a limited liability company in Delaware on October 22, 2021, for the purpose of servicing third-party commercial mortgage loans including origination, underwriting, servicing and debt collection services. Operations are expected to commence in the second half of 2022.

The entity 4445 Lamont Properties, LLC (“Lamont”) was formed as a limited liability company in Delaware for the sole purpose of holding real estate owned (“REO”) resulting from the foreclosure of a commercial mortgage loan by the lender, SLIC. Lamont was dissolved effective December 10, 2021, following the sale of the REO property to a third party.

7. PRIOR REPORT SUMMARY AND CONCLUSIONS

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

<u>Item</u>	<u>Description</u>
A	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. In response to the Department's concerns, the Company agreed that all future demonstrations will be signed, dated and finalized prior to the date of the statement of self-support. The Company also agreed that such demonstrations will be well organized, containing detailed narrative descriptions of the methodologies and material assumptions used such that another actuary can make a reasonable assessment of the analyses performed.

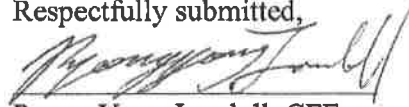
The Company was able to provide a signed demonstration and agreed to make all the required changes.

8. SUMMARY AND CONCLUSIONS

Following is the violation contained in this report:

<u>Item</u>	<u>Description</u>	<u>Page No(s).</u>
A	The Company violated Section 1505(d)(3) of the New York Insurance Law by receiving investment management services from its parent on a regular and systematic basis without notifying the Superintendent in writing of its intention to enter into any such transaction.	9

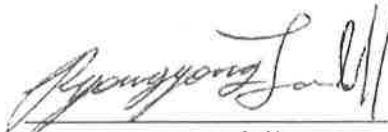
Respectfully submitted,



Pyong Yong Landoll, CFE
Noble Consulting Services, Inc.

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

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



Pyong Yong Landoll

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/
Mostafa Mahmoud
Principal Insurance Examiner

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

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

/s/
Mostafa Mahmoud

Subscribed and sworn to before me
this _____ day of _____

APPOINTMENT NO. 32297

NEW YORK STATE

DEPARTMENT OF FINANCIAL SERVICES

I, **SHIRIN EMAMI**, 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:

PYONG YONG LANDOLL
(NOBLE CONSULTING SERVICES, INC.)

as a proper person to examine the affairs of the

FIRST SYMETRA NATIONAL 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 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 24th day of August, 2021

SHIRIN EMAMI
Acting Superintendent of Financial Services

By:

Mark McLeod

MARK MCLEOD
DEPUTY CHIEF - LIFE BUREAU

