



**FINANCIAL CONDITION REPORT ON EXAMINATION**

**OF THE**

**JACKSON NATIONAL LIFE INSURANCE COMPANY**

**OF**

**NEW YORK**

**AS OF DECEMBER 31, 2021**

**EXAMINER:**

**MARC MOYER, CFE**

**DATE OF REPORT:**

**JUNE 14, 2023**

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KATHY HOCHUL  
Governor



ADRIENNE A. HARRIS  
Superintendent

June 23, 2023

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. 32429, dated July 21, 2022, and annexed hereto, an examination has been made into the condition and affairs of Jackson National Life Insurance Company of New York, hereinafter referred to as “the Company”. The Company’s administrative office is located at One Corporate Way, Lansing, MI 48951. The home office is located at 2900 Westchester Avenue, Purchase, NY 10577. 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 and recommendation contained in this report is summarized below.

- The Company violated Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64) by failing to furnish the superintendent with the name and title of the corporate officer responsible for its internal consumer services department. (See item 3E of this report.)
- As of December 31, 2021, 93.1% of the Company's admitted assets were derived from separate accounts. This separate account activity is mainly generated from the variable annuity guarantee block of business, which has been increasing each year, and is exposing the Company to additional risks. In light of the amount of this business in relation to the total business and the size of the Company, the examiner recommends that the Company consider limiting its exposure to variable annuity guarantees. A similar recommendation was included in the prior report on examination. (See item 5F 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, 2022 Edition* (the "Handbook"). The examination covers the three-year period from January 1, 2019, to December 31, 2021. The examination was conducted observing the guidelines and procedures in the Handbook and, where deemed appropriate by the examiner, transactions occurring subsequent to December 31, 2021, but prior to the date of this report (i.e., the completion date of the examination) were also reviewed.

The examination was conducted on a risk-focused basis in accordance with the provisions of the Handbook published by the 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 in conjunction with the examination of the Company's parent, Jackson National Life Insurance Company ("JNL"), and Brooke Life Insurance Company ("Brooke"), both Michigan domestic insurers. The coordinated examination was led by the State of Michigan with participation from the State of New York. 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 2019 through 2021, by the accounting firm of KPMG LLP (“KPMG”). The Company received an unqualified opinion in all the years. Certain audit workpapers of the accounting firm were reviewed and relied upon in conjunction with this examination. The Company shares an internal audit and an internal control department with its parent, JNL, which was given the task of assessing the internal control structure. The Company follows the same control processes as its parent. Where applicable, 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 recommendation and comment contained in the prior report on examination. The results of the examiner’s review are contained in item 6 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 the State of New York on July 11, 1995, under the name First Jackson National Life Insurance Company, and commenced business on August 16, 1996.

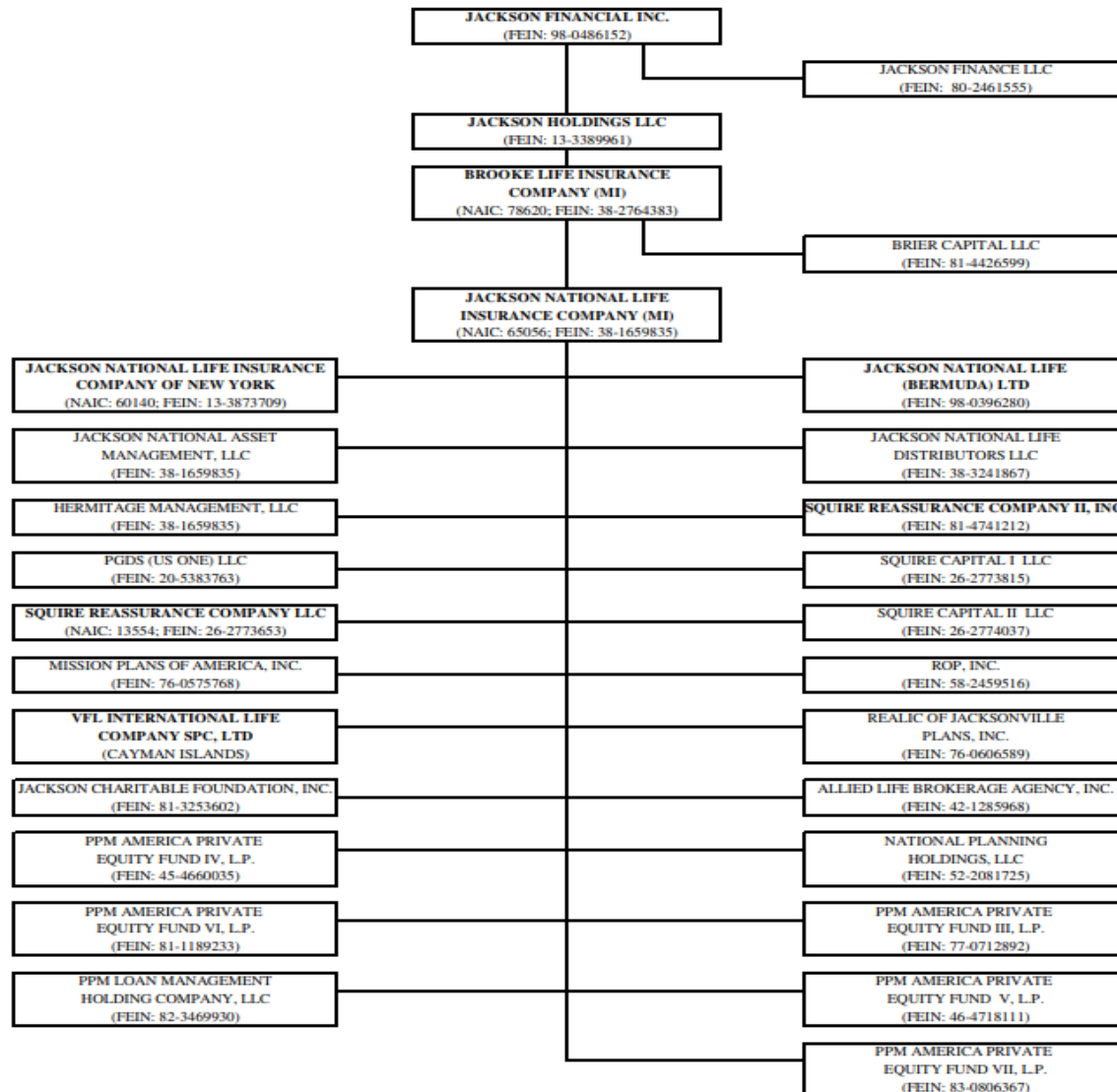
The Company formally adopted its present name effective September 26, 1997. Initial resources of \$486,961,580 consisting of common stock of \$2,000,000 and paid in and contributed surplus of \$484,961,580, were provided through the sale of 2,000 shares of common stock (with par value of \$1,000 each) for \$243,480.79 per share.

#### B. Holding Company

The Company is a wholly owned subsidiary of JNL, a Michigan insurer. JNL, in turn, is a wholly owned subsidiary of Brooke, which was formed in 1986. Until September 2021, JNL's ultimate parent company was Prudential plc, which is a financial services company that was headquartered in Hong Kong. However, as of September 13, 2021, Jackson Financial Inc. ("JFI") demerged from Prudential plc and is now operating independently as a publicly traded company known as JFI. JFI is now the ultimate parent company of 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, 2021, follows:





#### D. Service Agreements

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

Type of Agreement and Department File Number	Effective Date	Provider(s) of Services	Recipient(s) of Services	Specific Service(s) Covered	Expense* For Each Year of the Examination
Administrative Services  File No. 24644	11/03/1997	JNL	The Company	Accounting, tax and auditing, underwriting, claims, marketing and product development, functional support, payroll, personnel, and policyholder services	2019 \$(27,901,169) 2020 \$(38,658,821) 2021 \$(14,046,169)
Special Compensation, Consolidation and Cost Allocation  File No. 27718	12/31/1999	JNL/The Company	JNL/The Company	Special compensation for the managers employed by JNL and the Company	2019 \$(3,880,169) 2020 \$(4,629,541) 2021 \$(4,089,491)
Administrative Services and Expense Allocation  File No. 27719	12/31/1999	Jackson National Life Distributors, LLC (“JNLD”)	The Company	Product development, distribution, and marketing services	2019 \$(1,522,725) 2020 \$(1,623,749) 2021 \$ (906,102)
Amendment No. 2 and Restated Investment Advisory Agreement File No. 57108  Amendment No.1 and Restated File No. 60039	01/01/2021  01/01/2019	PPM America, Inc.	The Company	Investment Services	2019 \$(1,397,814) 2020 \$(1,488,939) 2021 \$(1,846,526)

Type of Agreement and Department File Number	Effective Date	Provider(s) of Services	Recipient(s) of Services	Specific Service(s) Covered	Expense* For Each Year of the Examination
Administrative Services Agreement  File No. 61668	12/27/2021	JFI	The Company	Human Resources, Payroll and Benefits, Information Security and Privacy and Risk Services, Information Technology, Accounting, Legal and Facilities Services.	2021 \$(11,142)

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

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

#### E. Management

The Company's by-laws provide that the board of directors shall be comprised of not less than 7 (except for vacancies temporarily unfilled) and not more than 21 directors. Directors are elected for a period of one year at the annual meeting of the stockholders held in March of each year. As of December 31, 2021, the board of directors consisted of six members. Meetings of the board are held quarterly.

The six board members and their principal business affiliation, as of December 31, 2021, were as follows:

<u>Name of Director</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
Barrett M. Bonemer Okemos, MI	Vice President Jackson National Life Insurance Company of New York	2018

<u>Name of Director</u>	<u>Principal Business Affiliation</u>	<u>Year First Elected</u>
Patrick G. Boyle* Spring Lake, NJ	Retired Executive Vice President New York Life Investment Management, LLC	2018
Richard K. Clinton* East Lansing, MI	Former President and Chief Executive Officer American Physicians Capital, Inc.	2017
Laura L. Hanson Leslie, MI	Senior Vice President Jackson National Life Insurance Company of New York	2012
Nancy F. Heller* New York, NY	Former Senior Managing Director Teachers Insurance and Annuity Association of America	2018
Scott E. Romine Brentwood, TN	President Jackson National Life Distributors	2021

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

Laura L. Prieskorn resigned from the board of directors effective March 22, 2021. Marc Socol was elected to the board of directors effective March 22, 2021, and resigned effective December 12, 2021. Robert K. Butler was elected as a director of the board effective March 1, 2022. Robert K. Butler replaced Marc Socol.

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, 2021:

<u>Name</u>	<u>Title</u>
Laura L. Prieskorn	Chief Executive Officer and President
Marcia L. Wadsten	Executive Vice President, Chief Financial Officer
Carrie L. Chelko	Executive Vice President, General Counsel and Secretary
Devkumar D. Ganguly	Executive Vice President, Chief Information Officer
Bradly O. Harris	Executive Vice President, Chief Risk Officer
Steve P. Binioris	Senior Vice President, Chief Actuary
Michael A. Costello	Senior Vice President, Treasurer

<u>Name</u>	<u>Title</u>
Don W. Cummings	Senior Vice President, Chief Accounting Officer
Dana S. Rapier	Senior Vice President, Chief Human Resources Officer
Stacey L. Schabel	Senior Vice President, Chief Audit Executive
Scott J. Golde	Senior Vice President, Deputy General Counsel
Courtney A. Hoffman	Senior Vice President, Deputy General Counsel
Guillermo E. Guerra	Senior Vice President, Chief Technology Officer, Chief Information Security Officer, and Privacy Officer
Laura L. Hanson	Senior Vice President
Thomas P. Hyatte	Senior Vice President

In February 2021, Michael Falcon, Chief Executive Officer; Axel Andre, Chief Financial Officer; and Drew Bowden, General Counsel, resigned as officers of the Company. These vacancies were filled by Laura Prieskorn, Marcia Wadsten, and Julia Goatley respectively in the same month.

Martha C. Palmeri was appointed consumer services officer per Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64) effective June 2, 2022.

Section 216.4 of 11 NYCRR 216 (Insurance Regulation No. 64) states, in part:

“(c) Every insurer shall establish an internal department specifically designated to investigate and resolve complaints filed with the Insurance Department and to take action necessitated as a result of its complaint investigation findings. Such internal department is to operate in a staff capacity to the entire company with authority to question and change the position taken in individual instances or company practices generally. Responsibility for such department is to be vested in a corporate officer who is also to be entrusted with the duty of executing the Insurance Department’s directives. If the Insurance Department requests the appearance of an insurer representative to discuss a pending matter, the individual whom the company sends shall be authorized to make any determination warranted after all the facts are elicited at such conference. Each insurer must furnish the superintendent with the name and title of the corporate officer responsible for its internal consumer services department. . . .”

The Company did not furnish the superintendent with the name and title of the corporate officer responsible for its internal consumer services department for the period covering May 2019 through June 2, 2022.

The Company violated Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64) by failing to furnish the superintendent with the name and title of the corporate officer responsible for its internal consumer services department.

#### 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 three states, namely Delaware, Michigan, and New York. In 2021, 85.0% of life premiums and 96.8% of annuity considerations were received from New York. Policies are written on a non-participating basis.

##### A. Statutory and Special Deposits

As of December 31, 2021, the Company had \$500,000 (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 primarily writes individual variable deferred annuities and a modest amount of individual fixed deferred annuities. In 2021, 99.9% of the Company's new premiums were derived from the sale of individual annuities.

The Company distributes its products in New York through independent agents and brokers, broker-dealers, and financial institutions. The Company has an agreement with JNLD by which it distributes its insurance and variable annuity products through five distribution channels: Institutional Marketing Group, JNLD Registered, Regional Broker Dealer, Independent Registered Investment Advisor, and JNLD Guaranteed.

##### C. Reinsurance

As of December 31, 2021, the Company had reinsurance treaties in effect with ten companies, of which eight were authorized or accredited. The Company's life business is reinsured on a coinsurance and yearly renewable term basis. Reinsurance is provided on an automatic and facultative bases.

The maximum retention limit for individual life contracts is 10% of each term life insurance policy and a maximum of \$500,000 for each universal life insurance policy. The total face amount of life insurance ceded as of December 31, 2021, was \$60,589,588, which represents

59.2% of the total face amount of life insurance in force. Reserve credit taken for reinsurance ceded to unauthorized companies, totaling \$1,545,185,891, was supported by a trust agreement.

The Company did not have any assumed insurance business as of December 31, 2021.

## 5. FINANCIAL STATEMENTS

The following statements show the assets, liabilities, capital and surplus as of December 31, 2021, as contained in the Company's 2021 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, 2021, filed annual statement.

### A. Independent Accountants

The firm of KPMG was retained by the Company to audit the Company's combined statutory-basis statements of financial position of the Company as of December 31<sup>st</sup> of each year in the examination period, and the related statutory-basis statements of operations, capital and surplus, and cash flows for the year then ended.

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	\$ 1,281,189,038
Cash, cash equivalents and short-term investments	45,918,813
Contract loans	348,272
Receivable for securities	141,220
Securities lending reinvested collateral assets	763,250
Investment income due and accrued	9,076,069
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	(335,539,186)
Deferred premiums, agents' balances and installments booked but deferred and not yet due	99,674
Reinsurance:	
Amounts recoverable from reinsurers	42,544,556
Other amounts receivable under reinsurance contracts	270,644,919
Current federal and foreign income tax recoverable and interest thereon	282,685
Receivables from parent, subsidiaries and affiliates	1,809,540
From separate accounts, segregated accounts and protected cell accounts	<u>17,730,900,324</u>
Total admitted assets	<u>\$19,048,179,174</u>



C. Liabilities, Capital and Surplus

Aggregate reserve for life policies and contracts	\$ 638,255,565
Liability for deposit-type contracts	9,467,638
Contract claims:	
Life	18,713,265
Premiums and annuity considerations for life and accident and health contracts received in advance	8,918
Commissions to agents due or accrued	6,362,570
General expenses due or accrued	2,953,271
Transfers to separate accounts due or accrued	(36,437,770)
Taxes, licenses and fees due or accrued, excluding federal income taxes	1,444,081
Amounts withheld or retained by company as agent or trustee	1,010,178
Remittances and items not allocated	1,676,896
Miscellaneous liabilities:	
Asset valuation reserve	9,973,523
Payable for Securities Lending	763,250
Escheat escrow liability - outstanding checks	339,360
Interest payable on contract claims	880,689
From Separate Accounts statement	<u>17,730,900,324</u>
 Total liabilities	 <u>\$18,386,311,758</u>
 Common capital stock	 \$ 2,000,000
Gross paid in and contributed surplus	503,858,735
Unassigned funds (surplus)	<u>156,008,681</u>
Surplus	\$ <u>659,867,416</u>
Total capital and surplus	<u>\$ 661,867,416</u>
 Total liabilities, capital and surplus	 <u>\$19,048,179,174</u>

D. Condensed Summary of Operations

	<u>2019</u>	<u>2020</u>	<u>2021</u>
Premiums and considerations	\$130,342,593	\$141,735,749	\$148,746,239
Investment income	45,757,846	44,273,914	44,748,515
Commissions and reserve adjustments on reinsurance ceded	137,370,167	154,461,591	148,285,147
Miscellaneous income	<u>30,875,749</u>	<u>32,467,921</u>	<u>39,113,362</u>
 Total income	 <u>\$344,346,355</u>	 <u>\$372,939,175</u>	 <u>\$380,893,263</u>
 Benefit payments	 \$178,487,572	 \$157,787,347	 \$197,734,265
Increase in reserves	(19,563,534)	47,191,617	(36,468,987)
Commissions	123,385,363	132,599,363	147,847,194
General expenses and taxes	32,166,748	42,413,326	17,443,271
Increase in loading on deferred and uncollected premiums	131,687	(71,529)	(47,480)
Net transfers to (from) Separate Accounts	5,808,337	(9,438,418)	4,330,353
Miscellaneous deductions	<u>(5,600,070)</u>	<u>(4,184,034)</u>	<u>(2,753,846)</u>
 Total deductions	 <u>\$314,816,103</u>	 <u>\$366,297,672</u>	 <u>\$328,084,770</u>
 Net gain (loss)	 \$ 29,530,252	 \$ 6,641,503	 \$ 52,808,493
Federal and foreign income taxes incurred	<u>1,883,497</u>	<u>(14,275,775)</u>	<u>4,426,629</u>
 Net gain (loss) from operations before net realized capital gains	 \$ 27,646,755	 \$ 20,917,278	 \$ 48,381,864
Net realized capital gains (losses)	<u>(531,802)</u>	<u>(978,565)</u>	<u>15,834</u>
Net income	<u>\$ 27,114,953</u>	<u>\$ 19,938,713</u>	<u>\$ 48,397,698</u>

E. Capital and Surplus Account

	<u>2019</u>	<u>2020</u>	<u>2021</u>
Capital and surplus, December 31, prior year	\$ <u>583,226,893</u>	\$ <u>612,694,053</u>	\$ <u>607,762,378</u>
Net income	\$ 27,114,953	\$ 19,938,713	\$ 48,397,698
Change in net unrealized capital gains (losses)	288,854	(100)	(167,792)
Change in net deferred income tax	10,088,582	(21,097,517)	0
Change in non-admitted assets and related items	(4,875,354)	4,332,007	674,298
Change in reserve valuation basis	0	(10,110,549)	0
Change in asset valuation reserve	(325,794)	(481,481)	(1,207,272)
Surplus adjustments:			
Paid in	7,200,808	2,534,399	9,161,952
Change in surplus as a result of reinsurance	(5,600,070)	(4,184,034)	(2,753,846)
Tax settlement	(4,424,819)		
Change in CARVM allowance on account of change in valuation basis	<u>0</u>	<u>4,136,887</u>	<u>0</u>
Net change in capital and surplus for the year	\$ <u>29,467,161</u>	\$ <u>(4,931,675)</u>	\$ <u>54,105,038</u>
Capital and surplus, December 31, current year	\$ <u>612,694,053</u>	\$ <u>607,762,378</u>	\$ <u>661,867,416</u>

F. Reserves

As of December 31, 2021, 93.1% of the Company's admitted assets were derived from separate accounts. This separate account activity is mainly generated from the variable annuity guarantee block of business, which has been increasing each year, and is exposing the Company to additional risks. In light of the amount of this business in relation to the total business and the size of the Company, the examiner recommends that the Company consider limiting its exposure to variable annuity guarantees. A similar recommendation was included in the prior report on examination.

## 6. PRIOR REPORT SUMMARY AND CONCLUSIONS

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

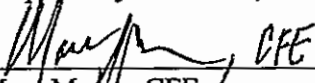
<u>Item</u>	<u>Description</u>
A	<p>As of December 31, 2018, 90.0% of the Company's admitted assets were derived from separate accounts. This separate account activity is mainly generated from the variable annuity guarantee block of business, which has been increasing each year, and is exposing the Company to additional risks. In light of the amount of this business in relation to the total business and the size of the Company, the examiner recommends that the Company consider limiting its exposure to variable annuity guarantees.</p> <p>The Company amended its variable annuity reinsurance agreement with its parent, JNL, effective December 31, 2016. However, the Company continues to expose itself to additional variable annuity guarantees. (See item 5F of this report.)</p>
B	<p>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.</p> <p>The Company implemented business continuity plans to ensure the availability of services to its customers, work at home capabilities for its employees, where appropriate, and other ongoing risk management activities. During the third quarter of 2021, the Company rolled out a broader hybrid return to office plan for all employees in waves over the remainder of 2021.</p> <p>From an asset management perspective, the Company granted concessions to certain of its commercial mortgage loan borrowers, including payment deferrals and other loan modifications. From claims perspective, the Company is monitoring claims on a monthly basis and performing experience studies including and excluding COVID-19 climate to isolate the effect of COVID-19. Based on the data from 2020 and 2021, the Company did not see a substantial amount of claims pertaining to COVID-19.</p>

## 7. SUMMARY AND CONCLUSIONS

Following are the violation and recommendation contained in this report:

<u>Item</u>	<u>Description</u>	<u>Page No(s).</u>
A	The Company violated Section 216.4(c) of 11 NYCRR 216 (Insurance Regulation 64) by failing to furnish the superintendent with the name and title of the corporate officer responsible for its internal consumer services department.	10
B	As of December 31, 2021, 93.1% of the Company's admitted assets were derived from separate accounts. This separate account activity is mainly generated from the variable annuity guarantee block of business, which has been increasing each year, and is exposing the Company to additional risks. In light of the amount of this business in relation to the total business and the size of the Company, the examiner recommends that the Company consider limiting its exposure to variable annuity guarantees. A similar recommendation was included in the prior report on examination.	18

Respectfully submitted,

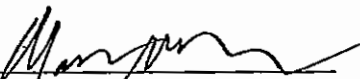
  
\_\_\_\_\_  
Marc Moyer, CFE  
Examination Resources, LLC

STATE OF TEXAS)

) SS:

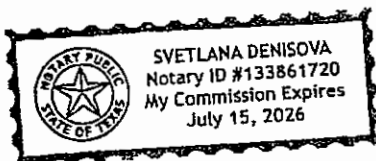
COUNTY OF COLLIN)

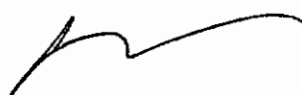
Marc Moyer, being duly sworn, deposes and says that the foregoing report, subscribed by him, is true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Marc Moyer

Subscribed and sworn to before me

this 22<sup>nd</sup> day of June 2023





Respectfully submitted,

\_\_\_\_\_  
/s/

Christine Mavour  
Associate Insurance Examiner

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

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

\_\_\_\_\_  
/s/

Christine Mavour

Subscribed and sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_



***APPOINTMENT NO. 32429***

***NEW YORK STATE***

***DEPARTMENT OF FINANCIAL SERVICES***

*I, **ADRIENNE A. HARRIS**, 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:*

**MARC MOYER**  
**(EXAMINATION RESOURCES, LLC)**

*as a proper person to examine the affairs of the*

**JACKSON 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 21st day of July, 2022*

**ADRIENNE A. HARRIS**  
*Superintendent of Financial Services*

By:

*Mark McLeod*

---

**MARK MCLEOD**  
**DEPUTY CHIEF - LIFE BUREAU**

