



**THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS
REGULATION**

DIVISION OF INSURANCE

***REPORT OF EXAMINATION OF THE*
PLYMOUTH ROCK ASSURANCE CORPORATION**

Boston, Massachusetts

As of December 31, 2007

NAIC GROUP CODE 0415

NAIC COMPANY CODE 14737

EMPLOYERS ID NO. 04-2800590

PLYMOUTH ROCK ASSURANCE CORPORATION

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COMMONWEALTH OF MASSACHUSETTS
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NONNIE S. BURNES
COMMISSIONER OF INSURANCE

April 24, 2009

The Honorable Alfred W. Gross, Chairman
Financial Condition (E) Committee, NAIC
Commissioner of Insurance
Bureau of Insurance
Commonwealth of Virginia
1300 East Main Street
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The Honorable Joel Ario
Secretary, Northeastern Zone, NAIC
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The Honorable Nonnie S. Burnes
Commissioner of Insurance
Commonwealth of Massachusetts
Office of Consumer Affairs and Business Regulation
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Honorable Commissioners:

Pursuant to your instructions and in accordance with Massachusetts General Laws, Chapter 175
Section 4, an examination has been made of the financial condition and affairs of the

PLYMOUTH ROCK ASSURANCE CORPORATION
Boston, MA

at its home office located at 695 Atlantic Avenue, Boston, Massachusetts, 02111. The following
report thereon is respectfully submitted.

SCOPE OF EXAMINATION

The Plymouth Rock Assurance Corporation (hereinafter referred to as “the Corporation”) was last examined as of December 31, 2002 under the association plan of the *National Association of Insurance Commissioners* (“NAIC”) by the Massachusetts Division of Insurance (the “Division”). The current association plan examination was also conducted by the Division, and covers the period from January 1, 2003 through December 31, 2007, including any material transactions and/or events occurring subsequent to the examination date as noted during the course of this examination.

Concurrent with this examination, the following insurance affiliates in the Plymouth Rock Company Insurance Group were also examined and separate Reports of Examination have been issued:

Bunker Hill Insurance Company
Pilgrim Insurance Company

The examination was conducted in accordance with standards established by the Financial Condition (E) Committee of the NAIC as well as with the requirements of the NAIC Financial Condition Examiner’s Handbook, the examination standards of the Division and with Massachusetts General Laws (“M.G.L.”). The principal focus of the examination was 2007 activity, however, transactions both prior and subsequent thereto were reviewed as deemed appropriate.

In addition to a review of the financial condition of the Corporation, the examination included a review of the Corporation’s business policies and practices, corporate records, reinsurance treaties, conflict of interest disclosure statements, fidelity bonds and other insurance, employees’ pension and benefits plans, disaster recovery plan, treatment of policyholders and other pertinent matters to provide reasonable assurance that the Corporation was in compliance with applicable laws, rules, and regulations. In planning and conducting the examination, consideration was given to the concepts of materiality and risk and examination efforts were directed accordingly.

The Corporation is audited annually by PricewaterhouseCoopers LLP, an independent certified public accounting firm. The firm expressed unqualified opinions on the Corporation’s financial statements for the calendar years 2003 through 2007. A review and use of the Certified Public Accountants’ work papers was made to the extent deemed appropriate and effective. An independent certified public accounting firm, Ernst & Young LLP, was retained by the Division to evaluate the adequacy of the Corporation’s loss and loss adjustment expense reserves as of December 31, 2007. An evaluation of the adequacy and effectiveness of the Information Technology Systems’ controls was done to determine the level of reliance to be placed on summary information generated by the data processing systems.

HISTORY

General

The Corporation, a stock corporation, was incorporated on December 21, 1982 under the laws of the Commonwealth of Massachusetts and commenced business on October 1, 1983. The Corporation is authorized to issue policies including, fire, burglary, robbery, theft, repair – replacement, ocean & inland marine, reinsurance except life, comprehensive motor vehicle & aircraft, personal property floater, accident & health, workers' compensation, automobile liability, liability other than automobile, glass, and water damage & sprinkler leakage.

The Corporation is authorized to transact business in Connecticut and Rhode Island as well as Massachusetts.

Capital Stock

The Corporation's Articles of Organization authorized the Corporation to issue 10,000 shares of common stock with a par value of \$50 per share. In 1982, the Corporation was initially capitalized through the issuance of 10,000 shares of common stock at a price of \$300 per share, as prescribed by M.G.L. c.175 s.48. The \$300 initial capitalization consisted of \$50 of common capital stock and \$250 of paid-in and contributed surplus, which produced capital of \$500,000 and paid-in and contributed surplus of \$2,500,000. During 1983, the Articles of Organization were amended to change the par value from \$50 to \$95. This resulted in an increase in common capital stock of \$450,000 and a decrease in gross paid-in and contributed surplus of \$450,000.

In 1984, an additional \$166,345 was contributed as gross paid-in capital. During 1997, the Articles of Organization were amended to change the par value to \$100 per share. Common capital stock was increased by \$50,000, and gross paid-in and contributed capital was decreased by \$50,000.

The Plymouth Rock Company owns all the outstanding shares of common stock of the Corporation. As of December 31, 2007, the Corporation had issued and outstanding 10,000 shares of common stock with an aggregate par value of \$1,000,000.

Dividends to Stockholder

The Corporation declared and paid the following dividends to its stockholder during the examination period:

2003	\$6,700,000
2004	5,500,000
2005	1,000,000
2006	-0-
2007	15,000,000

There were no declared but unpaid dividends as of December 31, 2007. The 2007 dividend was an extraordinary dividend.

Plymouth Rock Assurance Corporation

Growth of the Corporation

The growth of the Corporation for the years 2003 through 2007 is shown in the following schedule, which was prepared from the Corporation's Annual Statements, including any changes as a result of the examination.

<u>Year</u>	<u>Admitted Assets</u>	<u>Net Premiums Written</u>	<u>Surplus</u>
2003	\$ 309,735,157	\$ 165,765,480	\$ 77,162,053
2004	353,180,990	192,568,991	82,030,645
2005	390,723,679	229,004,601	94,524,258
2006	431,861,663	234,192,390	122,968,057
2007	420,421,059	210,549,159	122,411,535

Management

Annual Meeting

In accordance with the bylaws, the annual meeting of the stockholders of the Corporation ("Annual Meeting") is scheduled to be held on the third Tuesday of May. A majority in interest of all stock issued and outstanding and entitled to vote at the meeting shall constitute a quorum. By consent of its sole stockholder in lieu of the Annual Meeting, the Corporation has elected its Directors each year.

Board of Directors

The bylaws provide that the business and affairs of the Corporation shall be managed by the Board of Directors except as otherwise provided by the Articles of Organization, by law, or by the bylaws. The Board of Directors shall consist of not fewer than five Directors with the number to be determined at each Annual Meeting by vote of the stockholders. Each Director shall hold office until the next Annual Meeting. Upon death, removal, or resignation, his or her successor shall be elected by either the stockholders or the Directors.

At December 31, 2007 the Board was comprised of six Directors, which is in compliance with the bylaws.

Directors duly elected and serving at December 31, 2007, with address and business affiliations, follow:

Director
James M. Stone
Boston, MA

Business Affiliation
Chairman
The Plymouth Rock Company Incorporated

Plymouth Rock Assurance Corporation

James N. Bailey Cambridge, MA	Managing Director Cambridge Associates, Inc.
Hal Belodoff Newton, MA	President Plymouth Rock Assurance Corporation
Michael J. Johnston Gladstone, NJ	Executive Vice President The Capital Group, Inc.
Wilmot H. Kidd, III New York, NY	President Central Securities Corporation
Normal L. Rosenthal Philadelphia, PA	Director and Consultant to Insurance Companies

The bylaws do not specify the number of meetings of Directors to be held during a year. The minutes of the Board of Directors meetings indicate that meetings were held four times per year during the examination period. The bylaws provide that at any meeting of the Board, a majority of the Directors then in office (but not less than four) shall constitute a quorum. The minutes indicate that a quorum was present at all meetings of the Board of Directors held during the examination period.

Officers

The bylaws of the Corporation provide that the officers of the Corporation shall be a President, a Treasurer, a Secretary, and such other officers as the Board of Directors may elect or appoint. Pursuant to the bylaws, the officers of the Corporation shall be elected by the Board of Directors at its first meeting after the Annual Meeting. If any office becomes vacant, the Board of Directors may elect a successor.

The elected officers and their respective titles at December 31, 2007 follow:

<u>Name</u>	<u>Title</u>
James M. Stone	Chairman
James N. Bailey	Treasurer, Secretary
Hal Belodoff	President
Francis P. Arment	Vice President, Claims
Thomas A. Cranley	Chief Operating Officer
Paula W. Gold	Vice President and Chief Regulatory Counsel
William D. Hartranft	Vice President, Finance
Eric L. Kramer	Chief Knowledge Officer
Andrew T. Rippert	Chief Underwriting Officer
Mark A. Sweeney	Vice President, Marketing
Basilios E. Tsingos	Vice President and General Counsel
Colleen M. Granahan	Assistant Secretary
Stewart W. Kemp	Assistant Secretary

Plymouth Rock Assurance Corporation

Conflict of Interest Procedures

The Corporation has adopted a policy statement pertaining to conflicts of interest in accordance with Question 13 of the General Interrogatories of the Annual Statement. The Corporation has an established procedure for the disclosure to the Board of Directors of any material interest or affiliation on the part of any officer or director which conflicts or is likely to conflict with his or her official duties.

Annually, each officer and director completes a questionnaire disclosing any material conflicts of interest. The completed questionnaires were reviewed, and no discrepancies were noted in the responses to the General Interrogatories regarding conflicts of interest as reflected in the Corporation's 2007 Annual Statement.

Corporate Records

Articles of Organization and Bylaws

The bylaws and Articles of Organization and amendments thereto were read. There were no changes to the bylaws or Articles of Organization since the prior examination.

Disaster Recovery and Business Continuity

The Corporation provides for the continuity of management and operations in the event of a catastrophe or national emergency in accordance with M.G.L. c.175 ss. 180M-180Q.

Minutes of Meetings of the Board of Directors

The minutes of meetings of the Board of Directors for the period under examination were read. The minutes indicated that all meetings were held in accordance with the Corporation's bylaws and the laws of the Commonwealth of Massachusetts. Activities of the Committees were reported at each meeting of the Board of Directors.

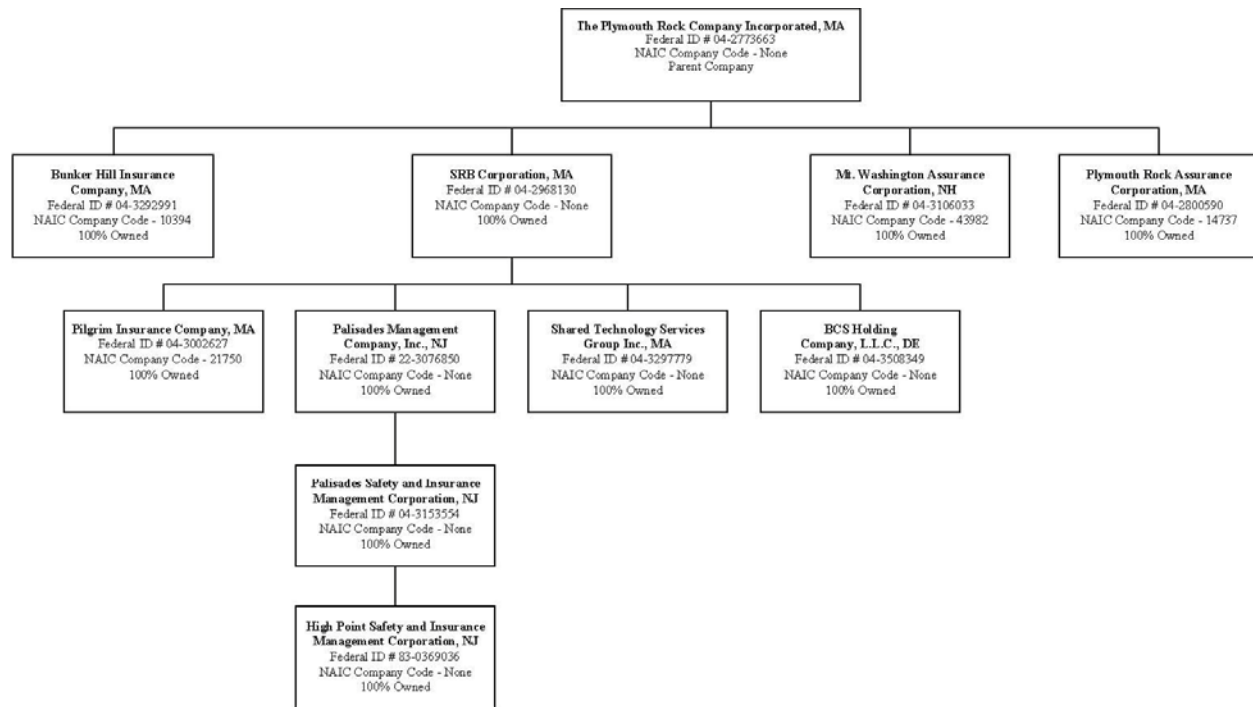
The minutes of the June 16, 2004 Board of Directors meeting noted that the prior Report of Examination as of December 31, 2002 was reviewed and accepted by the Board.

AFFILIATED COMPANIES

Per Form B, as filed with the Massachusetts Division of Insurance, the Corporation is a member of a holding company system and is subject to the registration requirements of M.G.L. c. 175 s 206C. The Plymouth Rock Company Incorporated is the "ultimate controlling person" for ten entities, including four insurance and six non-insurance corporations.

Plymouth Rock Assurance Corporation

Organization Chart



Transactions and Agreements with Subsidiaries and Affiliates

Management & Service Agreement

The Corporation provides and receives certain accounting, management and other services to and from its affiliates. Fees charged for these services are negotiated annually.

Tax Sharing Agreement

The Corporation participates in a tax allocation agreement with its eligible affiliates. The allocation method is based upon the respective tax liability of each member computed as if a separate return were filed, in accordance with the Internal Revenue Code. Inter-company tax balances are settled quarterly and after the tax filing is made in September.

FIDELITY BOND AND OTHER INSURANCE

The Corporation maintains fidelity coverage with an authorized Massachusetts insurer consistent with M.G.L. c.175 s.60. The aggregate limit of coverage exceeds the NAIC suggested minimum.

The Corporation has further protected its interests and property by policies of insurance covering other insurable risks. Coverage is provided by insurers licensed in the Commonwealth of Massachusetts and was in force as of December 31, 2007.

PENSION, STOCK OWNERSHIP AND INSURANCE PLANS

The Corporation offers various insurance plans, including group and family life, dental and health coverage, and long-term disability to all eligible employees.

The Corporation offers a Savings and Investment Plan under Section 401(k) of the Internal Revenue Code to all employees age 21 and older. This plan, which is a defined contribution plan, covers all participating employees of the Corporation beginning with the month following the date of employment.

STATUTORY DEPOSITS

<u>Location</u>	<u>Description of Deposit</u>	<u>Par Value</u>	<u>Statement Value</u>	<u>Market Value</u>
Massachusetts	US Treasury Note 4 3/4% due 2008	\$ 110,000	\$ 109,782	\$ 111,547
Rhode Island	US Treasury Note 4 3/4% due 2008	500,000	499,010	507,030
Total all Locations		<u>\$ 610,000</u>	<u>\$ 608,792</u>	<u>\$ 618,577</u>

INSURANCE PRODUCTS AND RELATED PRACTICES

Policy Forms and Underwriting Practices

The Corporation offers primarily personal property and liability coverage utilizing policy forms, riders and endorsements that are subject to the approval of the individual state insurance departments.

Territory and Plan of Operations

The Corporation is licensed to write business in Massachusetts, Connecticut and Rhode Island.

The Corporation's principal lines of business are automobile liability and physical damage provided primarily to personal risks through its appointed independent agents.

Advertising and Sales Material

The Corporation does not advertise or publish sales material for distribution to the general public. However, it does allow its agents to use its name in their advertising.

Treatment of Policyholders – Market Conduct

During the financial examination of the Company, the Division's Market Conduct Department initiated a comprehensive market conduct examination of the Company for the period January 1, 2007 through December 31, 2007. The market conduct examination was called pursuant to authority in M.G.L. c.175 s.4.

The market conduct examination is being conducted at the direction of, and under the overall management and control of, the market conduct examination staff of the Division. Representatives from the firm of Eide Bailly were engaged to complete certain agreed upon procedures which were developed using the guidance and standards of the NAIC Market Regulation Handbook, the market conduct examination standards of the Division, and the Commonwealth of Massachusetts insurance laws, regulations and bulletins.

The basic business areas that are being reviewed under this market conduct examination are Company Operations/Management; Complaint Handling; Marketing and Sales; Producer Licensing; Policyholder Services; Underwriting and Rating; Claims, in addition to an assessment of the Company's internal control environment. Once this market conduct examination is completed a Report on the Comprehensive Market Conduct Examination of the Company for the period January 1, 2007 through December 31, 2007 will be issued and become available as a public document.

REINSURANCE

Ceded Reinsurance

In-Force Treaties

During the examination period, the Corporation has ceded both direct and assumed business to General Reinsurance Corporation, Munich Reinsurance America, and AXA Re. Only AXA Re is not authorized to transact business in Massachusetts. AXA Re maintains a letter of credit with the Company. Business is ceded via quota share, excess of loss, and catastrophe treaties.

Quota Share

The quota share agreement with the Reinsurer provides coverage for the Corporation's direct Massachusetts voluntary retained private passenger automobile (comprehensive and collision), with the Corporation retaining a quota share of 65% and the Reinsurer covering 35%, not to exceed \$100,000.

Assumed Personal Umbrella coverage is retroceded to the Reinsurer. The Corporation retains 10% and the Reinsurer 90% of the first \$1,000,000 per occurrence and 100% for amounts in excess of \$1,000,000 not to exceed \$2,000,000 per occurrence. The Corporation cedes 100% of any policy limits in excess of \$1,000,000.

Plymouth Rock Assurance Corporation

Catastrophe

The Corporation has catastrophe reinsurance on automobile physical damage coverage. The Corporation has a \$2 million retention and reinsures the next \$7 million.

Each treaty reviewed contained an insolvency clause in accordance with M.G.L. c.175 s.20A.

Assumed Reinsurance

In-Force Treaties

Effective October 1, 2000, the Corporation entered into a quota share reinsurance agreement with its affiliate, Mt. Washington Assurance Corporation ("MWAC"), to assume 100% of MWAC's homeowners, umbrella, and automobile insurance business. Pursuant to M.G.L. c.175 ss.206C (n), notice of this transaction was provided to the Massachusetts Commissioner of Insurance. The Corporation assumes some commercial auto business from its affiliate, Pilgrim Insurance Company.

Pools and Facilities

The Corporation is a servicing carrier for Commonwealth Automobile Reinsurers ("CAR."), an involuntary automobile reinsurance pool. As such, the Corporation provides coverage on high-risk policies, written through exclusive representative producers, among others, which are then ceded to CAR. The Corporation assumes from CAR a percentage of the premium, losses and expenses generated by the pool.

SUBSEQUENT EVENTS

On July 15, 2008 the Division was asked to reopen the applications (put on hold at the Company's request on November 30, 2007) to obtain Certificates of Authority for the Plymouth Rock Assurance Casualty Company and the Plymouth Rock Assurance Indemnity Company to transact insurance as Massachusetts domestic insurers under M.G.L. Chapter 175. As of December 31, 2008 the applications are still open since the Company asked for an extension on September 9, 2008 in order to complete requirements by the Division to obtain the Certificates of Authority.

ACCOUNTS AND RECORDS

The internal controls structure was discussed with management through questionnaires and through a review of the work performed by the Corporation's Independent Certified Public Accountants. No material differences were noted.

The NAIC provides a questionnaire covering the evaluation of the controls in the Information Systems environment. The questionnaire was completed by the Corporation and reviewed by the Division to evaluate the adequacy of the information systems controls. No material deficiencies were noted.

The Corporation uses an automated general ledger system. Trial balances were traced from the general ledger and supporting documents to the 2007 Annual Statement. No material exceptions were noted.

The books and records of the Corporation are audited annually by PricewaterhouseCoopers LLP, independent Certified Public Accountants, in accordance with 211 CMR 23.00.

For Information Purposes Only

FINANCIAL STATEMENTS

The following financial statements are presented on the basis of accounting practices prescribed or permitted by the Division of Insurance of the Commonwealth of Massachusetts and by the *National Association of Insurance Commissioners* as of December 31, 2007.

Statement of Assets, Liabilities, and Surplus and Other Funds as of December 31, 2007

Underwriting and Investment Exhibit Statement of Income for the Year Ended
December 31, 2007

Reconciliation of Capital and Surplus, For the Five Year Period Ended
December 31, 2007

For Information Purposes Only

Plymouth Rock Assurance Corporation

Statement of Assets, Liabilities, Surplus and Other Funds as of December 31, 2007

Assets	As Reported by the Company	Examination Changes	Per Statutory Examination	Notes
Bonds	\$ 183,215,792	\$ 0	\$ 183,215,792	
Common stocks	52,434,773		52,434,773	
Mortgage loans on real estate				
First Liens	7,660,689		7,660,689	
Cash and short-term investments	3,330,477		3,330,477	
Other invested assets	67,751,300		67,751,300	
Receivable for securities	14,487		14,487	
Subtotals, cash and invested assets	314,407,518		314,407,518	
Investment income due and accrued	5,393,904		5,393,904	
Premiums and considerations:				
Uncollected premiums and agents' balances in the course of collection	19,095,686		19,095,686	
Deferred premiums, agents' balances and installments booked but deferred and not yet due	58,661,249		58,661,249	
Amounts recoverable from reinsurers	9,524,087		9,524,087	
Current federal and foreign income tax recoverable and interest thereon	2,415,994		2,415,994	
Net deferred tax asset	6,879,456		6,879,456	
Electronic data processing equipment	850,476		850,476	
Receivable from parent, subsidiaries and affiliates	2,940,624		2,940,624	
Aggregate write-ins for other than invested assets	72,065		72,065	
Total Assets	<u>\$ 420,241,059</u>	<u>\$ 0</u>	<u>\$ 420,241,059</u>	

Plymouth Rock Assurance Corporation

Statement of Assets, Liabilities, Surplus and Other Funds as of December 31, 2007

	As Reported by the Company	Examination Changes	Per Statutory Examination	Notes
Liabilities				
Losses	\$ 92,262,651	\$ 0	\$ 92,262,651	(1)
Reinsurance payable on paid losses and loss adjustment expenses	5,592,742		5,592,742	
Loss adjustment expenses	22,279,487		22,279,487	
Commissions payable	8,422,913		8,422,913	
Other expenses	11,089,550		11,089,550	
Taxes, licenses and fees	(321,573)		(321,573)	
Unearned premiums	99,609,750		99,609,750	
Advance premiums	6,741,257		6,741,257	
Ceded reinsurance premiums payable	28,296,447		28,296,447	
Funds held by company under reinsurance treaties	16,447,955		16,447,955	
Aggregate write-ins for liabilities	7,408,345		7,408,345	
Total Liabilities	297,829,524		297,829,524	
Common capital stock	1,000,000		1,000,000	
Gross paid in and contributed surplus	2,166,346		2,166,346	
Unassigned funds (surplus)	119,245,189		119,245,189	
Surplus as regards policyholders	122,411,535		122,411,535	
Total Liabilities, Capital and Surplus	\$ 420,241,059	\$ 0	\$ 420,241,059	

Plymouth Rock Assurance Corporation

Underwriting & Investment Exhibit Statement of Income the Year Ended December 31, 2007

	As Reported by the Company	Examination Changes	Per Statutory Examination	Notes
Premiums earned	\$ 220,357,229	\$ 0	\$ 220,357,229	
Deductions:				
Losses incurred	133,268,871		133,268,871	(1)
Loss expenses incurred	33,432,132		33,432,132	
Other underwriting expenses incurred	58,616,216		58,616,216	
Total underwriting deductions	225,317,219		225,317,219	
Net underwriting gain (loss)	(4,959,990)		(4,959,990)	
Net investment income earned	13,436,065		13,436,065	
Net realized capital gains (losses)	1,850,361		1,850,361	
Net investment gain (loss)	15,286,426		15,286,426	
Finance and service charges not included in premiums	4,028,062		4,028,062	
Total other income	4,028,062		4,028,062	
Net income before dividends to policyholders and before federal and foreign income taxes	14,354,498		14,354,498	
Federal and foreign income taxes incurred	2,135,674		2,135,674	
Net Income	\$ 12,218,824	\$ 0	\$ 12,218,824	

Plymouth Rock Assurance Corporation

Reconciliation of Capital and Surplus
For the Four Year Period Ended December 31, 2007

	2007	2006	2005	2004	2003
Capital and surplus, December 31, prior year	\$122,698,057	\$ 94,524,258	\$ 82,030,645	\$ 77,162,053	\$ 67,584,000
Net income	12,218,824	20,748,972	15,837,698	9,954,930	14,104,220
Change in net unrealized capital gains or (losses)	2,737,793	6,409,531	4,588,437	(1,804,400)	4,399,292
Change in net deferred income tax	(787,463)	2,502,504	2,600,491	1,442,969	117,441
Change in nonadmitted assets	544,324	(1,487,208)	(5,016,958)	775,094	(2,342,900)
Cumulative effect of changes in accounting principles	0	0	(4,516,055)	0	0
Dividends to stockholders	(15,000,000)	-	(1,000,000)	(5,500,000)	(6,700,000)
Net change in capital and surplus for the year	(286,522)	28,173,799	12,493,613	4,868,592	9,578,053
Capital and surplus, December 31, current year	<u>\$122,411,535</u>	<u>\$122,698,057</u>	<u>\$ 94,524,258</u>	<u>\$ 82,030,645</u>	<u>\$ 77,162,053</u>

NOTES TO FINANCIAL STATEMENTS

Note 1: Loss and Loss Adjustment Expense Reserves:

The Division retained the services of Ernst & Young LLP to provide an actuarial evaluation of the reasonableness of Loss and Loss Adjustment Expense (“LAE”) reserves recorded by the Corporation. The table below shows the findings resulting from their actuarial evaluation of the Corporation on both a net of reinsurance and gross of reinsurance basis.

Net of Reinsurance (\$000's)				
	<u>Company Carried</u>	<u>Low</u>	<u>Ernst & Young Indicated Point</u>	<u>High</u>
Total	\$114,542	\$109,478	\$118,779	\$128,080
Gross of Reinsurance (\$000's)				
	<u>Company Carried</u>	<u>Low</u>	<u>Ernst & Young Indicated Point</u>	<u>High</u>
Total	\$137,343	\$132,300	\$142,972	\$153,645

Net of Reinsurance Conclusion:

Ernst & Young’s indicated net liability range for Loss and LAE is \$109.5 million to \$128.1 million. As the recorded net reserve of \$114.5 million falls within this range we have accepted it as a reasonable provision in the aggregate for the Corporation’s unpaid Loss and LAE obligations as of December 31, 2007.

Gross of Reinsurance Conclusion:

Ernst & Young’s indicated gross liability range for Loss and LAE is \$132.3 million to \$153.6 million. As the recorded gross reserve of \$137.3 million falls within this range we have accepted it as a reasonable provision in the aggregate for the Corporation’s unpaid Loss and LAE obligations as of December 31, 2007.

ACKNOWLEDGMENT

Acknowledgment is made of the cooperation and courtesies extended by the officers and employees of the Corporation.

The assistance rendered by the following Massachusetts Division of Insurance examiners who participated in this examination is hereby acknowledged:

Daniel R. Dowd, Financial Examiner II
Guangping Wei, Financial Examiner II

John A. Turchi, CFE, CPCU
Supervising Examiner
Commonwealth of Massachusetts
Division of Insurance

Arthur C. Hughes
Examiner-in-Charge
Commonwealth of Massachusetts
Division of Insurance