



Illinois Department of Insurance

Bruce Rauner
Governor

Anne Melissa Dowling
Acting Director

December 29, 2015

Theodore Mathas, President
New York Life Insurance Company
New York Life Insurance and Annuity Corporation
51 Madison Ave
New York, NY 10010

Re: New York Life Insurance Company, NAIC 66915
New York Life Insurance and Annuity Corporation, NAIC 91596
Market Conduct Examination Report Closing Letter

Dear Mr. Mathas:

The Department has reviewed your Company's proof of compliance and deems it adequate and sufficient. Therefore, the Department is closing its file on this exam.

I intend to ask the Director to make the Examination Report available for public inspection as authorized by 215 ILCS 5/132. At the Department's discretion, specific content of the report may be subject to redaction for private, personal, or trade secret information prior to making the report public. However, any redacted information will be made available to other regulators upon request.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jack Engle".

Jack Engle, MCM
Assistant Deputy Director-Market Conduct and Analysis
Illinois Department of Insurance
320 West Washington- 5th Floor
Springfield, IL 62767
217-558-1058
E-mail: Jack.Engle@Illinois.gov

NEW YORK LIFE INSURANCE COMPANY
NEW YORK LIFE INSURANCE AND ANNUITY CORPORATION

MARKET CONDUCT EXAMINATION REPORT

DATE OF EXAMINATION: May 13, 2014 through July 8, 2015

EXAMINATION OF: New York Life Insurance Company
NAIC Number: 66915
New York Life Insurance and Annuity Corporation
NAIC Number: 91596

LOCATION: 51 Madison Avenue
New York, New York 10010

PERIOD COVERED
BY EXAMINATION: January 1, 2013 through December 31, 2013
COMPLAINTS: January 1, 2011 through December 31, 2013

EXAMINERS: Joan McClain, CIE, MCM, FLMI, AIRC, Examiner-In-Charge
Gerry Smith, AIE, CPM, MCM, FLMI, AIS, AIRC,
Laura Ervin, CPA, MCM
Michael Dolphin, MCM, JD, AIE
Michael Morrissey, MCM, AES, CISA, CISSP
Richard Brinkley, AIE, FLMI
Victor Negron, CIE, MCM, FLMI, IR
Finn Knox-Seith, Actuary
Rita Tansen, Actuary
Ari Loiben, Actuary
Dave Dillon, Actuary
Brian Stentz, Actuary
Pat Hahn, Illinois DOI Examiner
Max Weaver, Illinois DOI Examiner
Tiffany Jones, Illinois DOI Examiner

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I. SUMMARY

A comprehensive market conduct examination of New York Life Group, comprised of New York Life Insurance Company (NYLIC) and New York Life Insurance and Annuity Corporation (NYLIAC), collectively known as the “Companies” or the “Group,” was performed to determine compliance with Illinois Statutes and the Illinois Administrative Code.

The following represent general findings, however, specific details are found in each section of the report.

TABLE OF TOTAL VIOLATIONS

NEW YORK LIFE INSURANCE COMPANY

Crit #	Statute/Rule	Description of Violation	Population	Files Reviewed	Number of Violations	Findings Section	Error %
3	215 ILCS 5/1011(A)(1)	Life Underwriting - Failure to provide applicant with correct declination reason	11,827	116	1	6a	1%
6	50 Ill. Adm. Code 919.50(a)(1)	Denied Individual Long-Term Care - Failure to provide Notice of Availability of the DOI	10	10	10	7d	100%
8	50 Ill. Adm. Code 919.50(a)(1)	Denied Life - Failure to provide Notice of Availability of the DOI	2	2	1	7e	50%
10	50 Ill. Adm. Code 919.50(a)(1)	Paid Individual Long-Term Care - Failure to provide Notice of Availability of the DOI	681	83	53	7a	64%
11	50 Ill. Adm. Code 919.50(a)(1)	Paid Group Long-Term Care - Failure to provide Notice of Availability of the DOI	115	76	76	7a	100%
12	215 ILCS 5/357.9	Paid Group Long-Term Care - Failure to timely pay claim	115	76	1	7a	1%
14	50 Ill. Adm. Code 919.50(a)(1)	Denied Group Disability Income - Failure to provide Notice of Availability of the DOI	1	1	1	7d	100%
16	50 Ill. Adm. Code 919.50(a)(1)	Denied Group Hospital Indemnity - Failure to provide Notice of Availability of the DOI	22	22	1	7d	5%

Crit #	Statute/Rule	Description of Violation	Population	Files Reviewed	Number of Violations	Findings Section	Error %
18	215 ILCS 5/1011(A)(1)	Declined Life and Disability Income Applications - Failure to provide applicant with letter of declination	940	105	1	6b	1%
20	50 Ill. Adm. Code 919.50(a)(1)	Paid Group Major Medical - Allied Group - Failure to provide Notice of Availability of the DOI	693	83	4	7a	5%
22	50 Ill. Adm. Code 919.50(a)(1)	Denied Group Major Medical Allied Group - Failure to provide Notice of Availability of the DOI	263	46	41	7d	89%
29	215 ILCS 5/132(2)	Group Life Underwriting – Failure to provide adequate access to all records and information to reconstruct events, occurrences and procedures	23	23	1	6a	4%
30	50 Ill. Adm. Code 919.30(c)	Denied Group Major Medical - AVMA/UMR group - Failure to provide detailed documentation for the reconstruction of claim files	6733	109	15	7d	14%
32	215 ILCS 5/357.9	Denied Group Major Medical - AVMA/UMR group - Failure to affirm or deny timely	6733	109	2	7d	2%
33	215 ILCS 5/132(2)	Approved Waiver of Premium - Failure to provide files needed to complete the examination	92	79	8	5d	10%
34	50 Ill. Adm. Code 919.70(a)(2)	Approved Waiver of Premium - Failure to provide the insured with the Notice of Availability on 45-day delay letters	92	79	5	5d	6%
35	50 Ill. Adm. Code 919.70(a)(2)	Approved Waiver of Premium - Failure to provide the insureds with a 45-day delay letter	92	79	3	5d	4%

Crit #	Statute/Rule	Description of Violation	Population	Files Reviewed	Number of Violations	Findings Section	Error %
41	50 Ill. Adm. Code 919.50(a)(1)	Paid Group Major Medical AVMA/UMR group - Failure to provide Notice of Availability of the DOI	18,910	109	97	7a	89%
42	50 Ill. Adm. Code 919.50(a)	Paid Group Major Medical - AVMA/UMR group - Failure to affirm or deny coverage within 30 days	18,910	109	3	7a	3%
43	50 Ill. Adm. Code 919.30(c)	Paid Group Major Medical - AVMA/UMR group - Failure to provide detailed documentation for the reconstruction of claim files	18,910	109	1	7a	1%

NEW YORK LIFE INSURANCE AND ANNUITY CORPORATION

Crit #	Statute/Rule	Description of violation	Population	Files Reviewed	Number of Violations	Findings Section	Error %
9	50 Ill. Adm. Code 917.70(c)	Life and Annuity Replacements Issued - Failure to provide within 3 business days, a replacement notice to an existing insurer	561	79	2	6c	3%
13	215 ILCS 5/132(2)	Declined Life and Disability Income Applications - Failure to provide adequate access to all records and information to reconstruct events, occurrences and procedures	97	69	1	6b	1%
21	50 Ill. Adm. Code 919.30(c)	Life and Annuity Replacements Issued - Failure to provide declination letter after an appealed underwriting decision	561	79	1	6c	1%

II. BACKGROUND

New York Life Insurance Company:

New York Life Insurance Company was originally chartered in May, 1841 as Nautilus Insurance Company and was authorized to write fire and marine insurance, and inland navigation and transportation risks.

The charter was amended in April, 1843 to permit Nautilus Insurance Company to organize as a mutual company and write life insurance. The bylaws were amended in June, 1845 to restrict the NYLIC's business to "insurance on life and all and every insurance pertaining to life." NYLIC's name was officially changed to New York Life Insurance Company in 1849.

NYLIC is authorized to write life insurance, annuities, accident, and health insurance.

NYLIC is licensed to transact business in all 50 states, the District of Columbia, and Puerto Rico.

NYLIC writes whole life, term life, group life, group accident and health, membership association group life, long-term care, structured settlements, and group annuity policies.

Total Direct Premiums Written in Illinois for Life Insurance and other insurance, for NYLIC was as follows:

Year	Total Written Premium In Illinois (Per Schedule T of the Annual Statement)	Illinois Market Share
2013	\$367,771,448	0.97%

New York Life Insurance and Annuity Corporation:

New York Life Insurance and Annuity Corporation, was incorporated on November 3, 1980, under the laws of the State of Delaware. A Certificate of Authority, issued by the Insurance Commissioner on December 26, 1980, and amended on September 12, 1983, authorized NYLIAC to transact the business of life, including annuities, variable annuities, credit life, health, credit health and variable life.

NYLIAC is licensed in all 50 states, the District of Columbia, and the U.S. Virgin Islands. Since commencing operations, NYLIAC has engaged in the variable life insurance and annuities business.

Total Direct Premiums Written in Illinois for Life Insurance and Annuities, for NYLIAC was as follows:

Year	Total Written Premium In Illinois (Per Schedule T of the Annual Statement)	Illinois Market Share
2013	\$320,638,677	0.84 %

III. METHODOLOGY

The Market Conduct Examination covered the business for the period of January 1, 2013 through December 31, 2013. Specifically, the examination focused on a review of the following areas:

1. Operations/Management
2. Complaint Handling
3. Marketing and Sales
4. Producer Licensing
5. Policyholders Service
6. Underwriting and Rating
7. Claims

The review of the categories was accomplished through examination of internal audits/TPA contracts and agreements, complaint files, advertising materials, appointed and terminated producer files, new business application files, and claim files. Each of the categories was examined for compliance with Department Regulations and applicable State laws.

The report concerns itself with improper practices performed by NYLIC and NYLIAC, which resulted in a failure to comply with Illinois statutes and/or administrative rules. Criticisms were prepared and communicated to each of the Companies addressing violations discovered in the review process. All violations were cited in the report.

Samples were selected in accordance with the National Association of Insurance Commissioners (NAIC) Market Regulation Handbook utilizing Audit Command Language (ACL) software. The following procedures were used to ensure a uniform methodology for the sampling and review of documents obtained for the examination period:

Operations/Management

- 1a. Reviewed all disclosure forms
- 1b. Reviewed all internal audit reports
- 1c. Reviewed all third-party administrator audit reports
- 1d. Reviewed all third-party administrator agreements
- 1e. Reviewed computer information controls
- 1f. Reviewed disaster recovery plan
- 1g. Reviewed protection of nonpublic customer information
- 1h. Reviewed all privacy forms and Company procedures

Complaint Handling

- 2a. Sampled complaints received by the Illinois Department of Insurance
- 2b. Sampled complaints received by all Companies

Each Company was requested to provide all files relating to complaints received via the Department of Insurance and those received directly from the policyholder. Each Company was also requested to provide files of all policyholder complaints and external independent reviews handled during the survey period.

Marketing and Sales

- 3a. Sampled advertising materials used during the examination period
- 3b. Sampled producer training material utilized during the examination period

Producer Licensing

- 4a. Sampled active producers licensed during the examination period
- 4b. Sampled producer terminations for cause

Policyholders Service

- 5a. Sampled life cash surrenders
- 5b. Sampled extended term/reduced paid up insurance
- 5c. Sampled full cash annuity surrenders
- 5d. Sampled waivers of premium

Underwriting and Rating

- 6a. Sampled new business issued during the examination period
- 6b. Sampled life applications declined during the examination period
- 6c. Replacements

Claims

- 7a. Sampled health, disability income and long-term care claims paid during the examination period
- 7b. Sampled life claims paid during the examination period
- 7c. Sampled annuity claims paid during the examination period
- 7d. Sampled health, disability income and long-term care claims denied during the examination period for benefits not covered by the policy provisions
- 7e. Sampled life claims denied during the examination period

All claims were reviewed for compliance with policy contracts and applicable sections of the Illinois Insurance Code (215 ILCS 5/1 *et seq.*) and the Illinois Administrative Code (50 Ill. Adm. Code 101 *et seq.*).

IV. FINDINGS

A. Operations/Management

- 1a. A review of three (3) disclosure forms produced no criticisms.
- 1b. A review of 32 internal audit reports produced no criticisms.
- 1c. No reviews were performed on third-party administrator audit reports. Although it is the Companies' policy to audit their third-party administrators annually, they stated they had not performed any audits during 2013.
- 1d. A review of 30 third-party administrator agreements produced no criticisms.
- 1e. A review of the computer information controls produced no criticisms.
- 1f. A review of the Companies' disaster recovery plan produced no criticisms.
- 1g. A review of the procedures for the protection of nonpublic customer information produced no criticisms.
- 1h. A review of eight (8) privacy forms and procedures produced no criticisms.

B. Complaint Handling

- 2a. A review of 58 complaints received by the Illinois Department of Insurance produced no criticisms.
- 2b. A review of 160 directly received complaints produced no criticisms.

C. Marketing and Sales

- 3a. A review of 79 pieces of advertising materials and 83 websites produced no criticisms.
- 3b. A review of producer training materials and eight (8) company web based training sites produced no criticisms.

D. Producer Licensing

- 4a. A review of 170 agents to determine whether the agents were duly licensed produced no criticisms.
- 4b. There were no producers terminated for cause during the examination period, therefore, none were reviewed.

E. Policyholders Service

- 5a. Full Life Cash Surrenders
A review of 190 surrenders produced no criticisms.
- 5b. Full Annuity Cash Surrenders
A review of 173 surrenders produced no criticisms.

- 5c. Extended Term Insurance/Reduced Paid Up
A review of 111 requests produced no criticisms.
- 5d. Waiver of Premium
A review of 79 waivers of premium requests produced six (6) criticisms all issued to NYLIC as follows:
- For failure to provide files needed to complete the examination as required by 215 ILCS 5/132(2) – eight (8) claims – Criticism # 33 was issued to NYLIC;
 - For failure to provide the insured with a reasonable written explanation for delay of claims settlement beyond 45 days as required by 50 Ill. Adm. Code 919.70(a)(2) – three (3) claims – Criticism # 35 was issued to NYLIC; and,
 - For failure to provide the insured with a “Notice of Availability of the DOI” on the 45-day delay letters as required by 50 Ill. Adm. Code 919.70(a)(2) – five (5) claims – Criticism # 34 was issued to NYLIC;

F. Underwriting and Rating

- 6a. New Business Issued
A review of 461 individual and group life, long-term care, and health policies issued produced two (2) criticisms. A review of 116 individual life applications produced one (1) criticism for failure to list a correct reason for a declined life application as required by 215 ILCS 5/1011(A)(1), and a review of 23 group life applications produced one (1) criticism for failure to provide adequate access to all records and information as required by 215 ILCS 5/132(2). Criticisms # 3 and 29 were issued to NYLIC.
- 6b. Declined Individual and Group Life and Disability Income Applications
A review of 241 declined individual and group life applications identified two (2) criticisms. A review of 105 declined individual life and disability income applications produced one (1) criticism for failure to provide a letter of declination for adverse underwriting as required by 215 ILCS 5/1011(A)(1). Criticism # 18 was issued to NYLIC. A review of 69 individual life disability income applications produced one (1) criticism for failure to provide adequate access to all records and information as required by 215 ILCS 5/132(2). Criticism # 13 was issued to NYLIAC.
- 6c. Life and Annuity Replacements Issued
A review of 301 life and annuity replacements produced two (2) criticisms. A review of 79 life and annuities replacements issued identified two (2) files for which NYLIAC failed to provide within three (3) business days, a replacement notice to an existing insurer as required by 50 Ill. Adm. Code 917.70(c). Criticism # 9 was issued to NYLIAC. In addition, the review identified one (1) file for which NYLIAC failed to provide a letter of declination as required by 50 Ill. Adm. Code 919.30(c). Criticism # 21 was issued to NYLIAC.

G. Claims

- 7a. Paid Health, Disability Income, and Long-Term Care Claims
A review of 534 paid claims was performed, resulting in the following:
- A review of 109 Paid Group Major Medical - AVMA/UMR group claims produced one (1) criticism. In three (3) claims NYLIC failed to affirm or deny the claims within 30 days as required by 50 Ill. Adm. Code 919.50(a). NYLIC did pay the required interest. – Criticism # 42 was issued to NYLIC;
 - A review of 76 Paid Group Long-Term Care claims produced one (1) criticism. In one (1) claim NYLIC failed to timely pay the claim within 30 days of receipt of proof as required by 215 ILCS 5/357.9. – Criticism # 12 was issued to NYLIC;
 - A review of 109 Paid Group Major Medical - AVMA/UMR group claims produced one (1) criticism. In one (1) claim NYLIC failed to provide detailed documentation for the reconstruction of claim files as required by 50 Ill. Adm. Code 919.30(c) – Criticism # 43 was issued to NYLIC; and,
 - A review of 83 Paid Individual Long-Term Care, 76 Paid Group Long-Term Care, 83 Paid Group Major Medical - Allied Group and 109 Paid Group Major Medical AVMA/UMR group claims produced four (4) criticisms. In 230 claims NYLIC failed to provide the “Notice of Availability of the DOI,” as required by 50 Ill. Adm. Code 919.50(a)(1). - Criticisms # 10, 11, 20, and 41 were issued to NYLIC.
- 7b. Paid Life Claims
A review of 207 paid life claims was performed, resulting in no criticisms issued.
- 7c. Paid Annuity Claims
A review of 158 annuity death claims was performed, resulting in no criticisms issued.
- 7d. Denied Health, Disability Income, and Long-Term Care Claims
A review of 225 denied claims was performed, resulting in the following:
- A review of 109 Denied Group Major Medical - AVMA/UMR group claims produced one (1) criticism. In two (2) claims NYLIC failed to affirm or deny the claims within the required 30 days of receipt of proof as required by 215 ILCS 5/357.9 – Criticism # 32 was issued to NYLIC;
 - A review of ten Denied Individual Long-Term Care, one (1) Denied Group Disability Income, 22 Denied Group Hospital Indemnity, and 46 Denied Group Major Medical Allied Group claims produced four (4) criticisms. In 53 claims NYLIC failed to provide the “Notice of Availability of the DOI,” as required by 50 Ill. Adm. Code 919.50(a)(1) – Criticisms # 6, 14, 16 and 22 were issued to NYLIC;
 - A review of 109 Denied Group Major Medical - AVMA/UMR group claims produced one (1) criticism. In fifteen claims NYLIC failed to provide an Explanation of Benefits (EOB) to examiners to reconstruct the claim as required by 50 Ill. Adm. Code 919.30(c) – Criticism # 30 was issued to NYLIC; and,
- 7e. Denied Life Claims
A review of two (2) Denied Life claims produced one (1) criticism. In one (1) claim NYLIC failed to provide the “Notice of Availability of the DOI,” as required by 50 Ill. Adm. Code 919.50(a)(1). – Criticism # 8 was issued to NYLIC.

STATE OF FLORIDA)
) ss
COUNTY OF LEON)

Joan McClain, being first duly sworn upon her oath, deposes and says:

That she was appointed by the Director of Insurance of the State of Illinois (the "Director") as Examiner-In Charge to examine the insurance business and affairs of New York Life Insurance Company (NYLIC) and New York Life and Annuity Corporation (NYLIAC), (the "Companies"), NAIC #s 66915 and 91596, (respectively).

That the Examiner-In-Charge was directed to make a full and true report to the Director of the examination with a full statement of the condition and operation of the business and affairs of the Company with any other information as shall in the opinion of the Examiner-In-Charge be requisite to furnish the Director with a statement of the condition and operation of the Companies' business and affairs and the manner in which the Company conducts its business;

That neither the Examiner-In-Charge nor any other persons so designated nor any members of their immediate families is an officer of, connected with, or financially interested in the Company nor any of the Company's affiliates other than as a policyholder or claimant under a policy or as an owner of shares in a regulated diversified investment company, and that neither the Examiner-In-Charge nor any other persons so designated nor any members of their immediate families is financially interested in any other corporation or person affected by the examination;

That an examination was made of the affairs of the Company pursuant to the authority vested in the Examiner-In-Charge by the Director of Insurance of the State of Illinois;

That she/he was the Examiner-in-Charge of said examination and the attached report of examination is a full and true statement of the condition and operation of the insurance business and affairs of the Company for the period covered by the Report as determined by the examiners;

That the Report contains only facts ascertained from the books, papers, records, or documents, and other evidence obtained by investigation and examined or ascertained from the testimony of officers or agents or other persons examined under oath concerning the business, affairs, conduct, and performance of the Company.

Joan McClain
Examiner-In-Charge

Subscribed and sworn to before me
this 9 day of July, 2014.

John Paul Sinclair, Jr.
Notary Public



STATE OF ILLINOIS
DEPARTMENT OF INSURANCE



IN THE MATTER OF:

NEW YORK LIFE INSURANCE COMPANY, NAIC 66915
NEW YORK LIFE INSURANCE AND ANNUITY CORPORATION, NAIC 91596
51 MADISON AVE
NEW YORK, NY 10010

STIPULATION AND CONSENT ORDER

WHEREAS, the Acting Director of the Illinois Department of Insurance ("Department") is a duly authorized and appointed official of the State of Illinois, having authority and responsibility for the enforcement of the insurance laws of this State; and

WHEREAS, New York Life Insurance Company and New York Life Insurance and Annuity Corporation ("Companies"), are authorized under the insurance laws of this State and by the Acting Director to engage in the business of soliciting, selling and issuing insurance policies; and

WHEREAS, a Market Conduct Examination of the Companies was conducted by a duly qualified examiner of the Department pursuant to Sections 132, 401, 402, 403, 407, and 425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402, 5/403, 5/407, and 5/425); and

WHEREAS, as a result of the Market Conduct Examination, the Department examiner filed a Market Conduct Examination Report which is an official document of the Department; and

WHEREAS, the Market Conduct Examination Report cited various areas in which the Companies were not in compliance with the Illinois Insurance Code (215 ILCS 5/1 *et seq.*) and Department Regulations (50 Ill. Adm. Code 101 *et seq.*); and

WHEREAS nothing herein contained, nor any action taken by the Companies in connection with this Stipulation and Consent Order, shall constitute, or be construed as, an admission of fault, liability or wrongdoing of any kind whatsoever by the Companies; and

WHEREAS, the Companies are aware of and understand their various rights in connection with the examination and report, including the right to counsel, notice, hearing and appeal under Sections 132, 401, 402, and 407, 407.2 of the Illinois Insurance Code and 50 Ill. Adm. Code 2402; and

WHEREAS, the Companies understand and agree that by entering into this Stipulation and Consent Order, they waive any and all rights to notice and hearing; and

WHEREAS, the Companies and the Acting Director, for the purpose of resolving all matters raised by the report and in order to avoid any further administrative action, hereby enter into this Stipulation and Consent Order.

NOW, THEREFORE, IT IS agreed by and between the Companies and the Acting Director as follows:

1. The Market Conduct Examination indicated various areas in which the Companies were not in compliance with provisions of the Illinois Insurance Code and Department Regulations; and
2. The Acting Director and the Companies consent to this Order requiring the Companies to take certain actions to come into compliance with provisions of the Illinois Insurance Code and Department Regulations.

THEREFORE, IT IS HEREBY ORDERED by the undersigned Acting Director that the Companies shall:

1. Institute and maintain changes to all notification letters to ensure all claimants are notified of the availability of the Department of Insurance as required by 50 Ill. Adm. Code 919.50(a)(1).
2. Institute and maintain procedures whereby all claims are adequately documented to allow for the reconstruction of claim files as required by 50 Ill. Adm. Code 919.30(c).
3. Institute and maintain procedures whereby all claims documentation is accessible as required by 215 ILCS 5/132(2).
4. Submit to the Acting Director of Insurance, State of Illinois, proof of compliance with the above three (3) orders within 30 days of execution of this Order.
5. Pay to the Acting Director of Insurance, State of Illinois, a civil forfeiture in the amount of \$26,450 to be paid within 30 days of execution of this Order.

NOTHING contained herein shall prohibit the Acting Director from taking any and all appropriate regulatory action as set forth in the Illinois Insurance Code, including but not limited to levying additional forfeitures, should the Companies violate any of the provisions of this Stipulation and Consent Order or any provisions of the Illinois Insurance Code or Department Regulations.

On behalf of NEW YORK LIFE INSURANCE COMPANY and
NEW YORK LIFE INSURANCE AND ANNUITY CORPORATION

Thomas F. English
Signature

THOMAS F. ENGLISH
Name

SENIOR VP & Chief Insurance Counsel
Title

Subscribed and sworn to before me this
24th day of November 2015.

Heather Farrell
Notary Public
Heather Farrell
Notary Public, State of New York
No. 01FA6174228- Richmond County
Commission Expires September 17, 2019



DATE 12/7/15

DEPARTMENT OF INSURANCE of the
State of Illinois:

Anne Melissa Dowling
Acting Director