

Slavery Era Insurance Policy Report

April 2012

For further information concerning this document please contact:

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This document is available in an alternate format upon request from a qualified individual with a disability.

1-800-735-2258 (TTY)

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www.mdinsurance.state.md.us

Background

In 2009, the Maryland General Assembly passed and the Governor signed Senate Bill 751 (Chapter 97, Acts of 2009, codified as Title 30 of the Insurance Article, Annotated Code of Maryland) which requires an insurer that is authorized to do business in the State to provide the Maryland Insurance Commissioner (Commissioner) with a report of information in the records of the insurer about each slaveholder insurance policy issued in the State by the insurer, or any predecessor of the insurer, during the slavery era and a copy of each document in the insurer's records that relates to the information. Section 30-101 defines "slaveholder insurance policy" as a policy issued to or for the benefit of a slaveholder to insure the slaveholder against injury to a slave or the death of a slave. The "slavery era" is defined as those years prior to 1865. This *Slavery Era Insurance Policy Report*, which is a report of the information provided to the Commissioner regarding slaveholder insurance policies, is required by § 30-103.

Implementation

Chapter 97 required insurers to provide the Commissioner with a report on or before

October 1, 2011. The Commissioner was also required to adopt regulations on or before January

1, 2010, specifying the form and content of the report. Regulations specifying the form and
content of the required report were finalized on December 28, 2009 under COMAR 31.16.09 and
can be found in Appendix 1. In addition, on December 18, 2009, the Maryland Insurance

Administration (MIA) issued Bulletin 09-32 to clarify that all authorized insurers doing business
in Maryland would be required to submit a report even if the company or its predecessor
company was not in existence during the slavery era. A copy of Bulletin 09-32 can be found in
Appendix 2.

Insurer Responses

As of June 30, 2011, there were 1,431 insurers authorized to do business in the State. On October 1, 2011, the Commissioner was in receipt of reports from 259 insurers or holding companies. By April 20, 2012, an additional 54 insurers or holding companies had submitted reports. Reports from these 312 insurers or holding companies provide responsive information from a total of 883 insurers. Of the 883 insurer reports, the vast majority indicated that the insurer or its predecessor had been incorporated after 1865.

Reports from 27 insurers or holding companies indicated that the insurer or a predecessor was in existence before 1865. A list of these insurers can be found in Appendix 3. Of these insurers, some indicated that they conducted a thorough search of their archives and records, but were unable to find responsive information or documents. A variation of these responses was that the company no longer had any responsive documents because the documents had been destroyed. A few companies responded indicating they had undertaken an exhaustive search of their records and had discovered slaveholder insurance policies but none were issued in Maryland. The responses received from the 27 insurers or holding companies that were in existence before 1865 can be found in Appendix 4. A list of all insurers that submitted reports can be found in Appendix 5.

As more than 38% of the insurers authorized to do business in the State did not submit a report as required under Title 30 of the Insurance Article, the regulations adopted under COMAR 31.16.09, and MIA Bulletin 09-32, the MIA will issue another bulletin directed at these insurers requesting that they comply with the reporting requirement by July 1, 2012. An insurer that does not comply with the reporting requirement may be subject to appropriate enforcement action, including but not limited to the assessment of a monetary penalty. If, as a result of the second

bulletin, the MIA receives responsive data from an insurer that was in existence prior to 1865, the MIA will submit an addendum to this report.

Public Access

This report shall be available on the website of the Maryland Insurance Administration. In addition, a copy of this report will be available for inspection at the Thurgood Marshall Law Library at the University of Maryland School of Law located at 500 W. Baltimore Street, Baltimore, MD 21201-1786.

Appendix 1

Code of Maryland Regulations Title 31 MARYLAND INSURANCE ADMINISTRATION Subtitle 16 MISCELLANEOUS

Chapter 09 Registry and Report on Slavery Era Insurance

Authority: Insurance Article, §§2-109(a)(1) and 30-102(c), Annotated Code of Maryland

.01 Purpose.

- A. This chapter sets forth standards for reporting slavery era insurance information pursuant Insurance Article, Title 30, Annotated Code of Maryland.
- B. This chapter requires insurers to provide information and data regarding slavery era insurance to the Maryland Insurance Administration.
- C. This chapter specifies how the Administration will distribute to the public the information provided pursuant to §B of this regulation.

.02 Definitions.

- A. In this chapter, the following terms have the meanings indicated.
- B. Terms Defined.
- (1) "Commissioner" means the Maryland Insurance Commissioner.
- (2) "Holding company system" includes:
- (a) An insurer that is a member of the holding company system; and
- (b) Any other member, subsidiary, or division of the holding company system, in each case regardless of whether it is a licensee.
- (3) "Insurer" has the meaning stated in Insurance Article, §1-101, Annotated Code of Maryland.
- (4) "Predecessor insurer" means an insurer associated with the reporting insurer that existed prior in time to the reporting insurer.
- (5) "Reporting insurer" has the meaning stated in Insurance Article, §30-101, Annotated Code of Maryland.
- (6) "Slave" has the meaning stated in Insurance Article, §30-101, Annotated Code of Maryland.
- (7) "Slaveholder" has the meaning stated in Insurance Article, §30-101, Annotated Code of Maryland.
- (8) "Slaveholder insurance policies" has the meaning stated in Insurance Article, §30-101, Annotated Code of Maryland.
- (9) "Slavery era" has the meaning stated in Insurance Article, §30-101, Annotated Code of Maryland.

.03 Reporting Insurers.

- A. An insurer authorized to do business in the State shall file a report to the Commissioner regarding slaveholder insurance policies that it wrote either directly or through a predecessor insurer during the slavery era.
- B. If an insurer is a member of a holding company system, a consolidated report may be filed by one insurer in the holding company on behalf of all members of the same holding company that are required to file a report.
- C. A consolidated report allowed pursuant to §B of this regulation shall designate one insurer as the reporting insurer for purposes of compliance with this chapter and shall specify which insurers are included in the report.
- D. Insurers choosing to file a consolidated report pursuant to §§B and C of this regulation shall comply with all other requirements of this chapter.

.04 Report Format and Content.

- A. The report required by Regulation .03A of this chapter shall be filed on letterhead of the insurer, dated, and certified and
- affirmed under oath by the chief executive officer, or comparable officer, of the insurer as:
- (1) Being true and not misleading; and
- (2) Containing the most accurate information available at the time of the submission of the report.
- B. The report required by Regulation .03A of this chapter shall include the following:
- (1) A paragraph identifying the insurer, stating the insurer's:
- (a) Name;

- (b) Address;
- (c) Telephone number;
- (d) Fax number;
- (e) E-mail address; and
- (f) NAIC number and website URL, if any, for the main office of the insurer making the report;
- (2) A contact person with the insurer, including the contact person's:
- (a) Title;
- (b) Address:
- (c) Telephone number;
- (d) Fax number; and
- (e) E-mail address;
- (3) The research methodology used in generating and preparing the report, including:
- (a) A description of the methods employed by the insurer to identify and compile the records and information that are responsive to this chapter; and
- (b) A description of the research which was conducted at the insurer's own facility as well as a description of research which was conducted at other facilities known to the insurer;
- (4) If the insurer has found no responsive data, it shall so state;
- (5) The names of slaves, in alphabetical order, in the following order:
- (a) Last name;
- (b) First name;
- (c) The name of the slaveholder, beneficiary, policyholder, or all of them;
- (e) The county or parish in which the slave resided;
- (f) The state in which the slave resided; and
- (g) Any other identifying information;
- (6) The names of slaveholders, in alphabetical order, in the following order:
- (a) Last name;
- (b) First name:
- (c) The county or parish in which the slaveholder resided;
- (d) The state in which the slaveholder resided; and
- (e) Any other identifying information; and
- (7) The policy information, including:
- (a) Copies of all records and documents regarding insurance policies issued to slaveholders that provided coverage for injury to or death of slaves; and
- (b) Translations of any records or documents in any language other than English, along with a copy of the document together with a certified translation.
- C. An original plus one copy of the reports generated pursuant to §A of this regulation shall be filed on paper and mailed to the Maryland Insurance Administration, Slavery Era Insurance Registry, 200 St. Paul Place, Suite 2700, Baltimore, MD 21202.
- D. The sections of the reports outlined in $\S B(4)$ and (5) of this regulation, shall also be submitted in the electronic format approved by the Commissioner.

.05 Submission.

- A. Each insurer shall file the report required by Regulation .04 of this chapter with the Commissioner on or before October 1, 2011.
- B. If the Commissioner determines that a report is incomplete, the Commissioner may require additional reports, as necessary, consistent with the requirements of this chapter.
- C. An insurer that files a report indicating that it has information responsive to the relevant statute and this chapter, which has not been provided, shall inform the Commissioner as to the reason that the required information has not been provided and when the required information will be filed.

.06 Availability of the Slavery Era Insurance Policy Registry and Report.

- A. The report generated by the Commissioner pursuant to Insurance Article, Title 30, Annotated Code of Maryland, and this chapter, shall be known as the Slavery Era Insurance Policy Registry and Report.
- B. The Commissioner shall provide the Slavery Era Insurance Policy Registry and Report to the Governor and General Assembly on or before April 1, 2012.

- C. The Commissioner shall make available to the public a copy of the Slavery Era Insurance Policy Registry and Report on the Maryland Insurance Administration's website.
- D. The Slavery Era Insurance Policy Registry and Report shall be accessible to the public at the Thurgood Marshall Law Library at the University Of Maryland School Of Law and any other means that the Commissioner considers appropriate.

.07 Enforcement.

The Commissioner may impose on an insurer any penalty, sanction, or other form of legal enforcement which the Commissioner has the authority to impose for failure to comply with the provisions of this chapter.

Administrative History

Effective date: December 28, 2009 (36:26 Md. R. 1999)

Appendix 2

MARTIN O'MALLEY Governor

ANTHONY G. BROWN Lt. Governor



RALPH S. TYLER Commissioner

BETH SAMMIS KAREN STAKEM HORNIG Deputy Commissioners

200 St. Paul Place, Suite 2700, Baltimore, Maryland 21202 1-800-492-6116 TTY: 1-800-735-2258 www.mdinsurance.state.md.us

BULLETIN 09-32

Date:

December 18, 2009

To:

All Property & Casualty Insurers and Interested Parties

Re:

Registry and Report on Slavery Era Insurance

During the 2009 Legislative Session, the Maryland General Assembly adopted Insurance Article, Title 30, Annotated Code of Maryland. The newly added title obligates insurers to produce documents relating to slaveholder insurance policies issued in Maryland during the slavery era, defined in the new title as the years prior to 1865. The new title also requires the Maryland Insurance Commissioner (Commissioner) to issue a report based on the information provided by insurers regarding slaveholder insurance policies.

In December 2009, the Commissioner adopted new chapter COMAR 31.16.09 Registry and Report on Slavery Era Insurance. The new chapter specifies the form and content of reports to be provided by insurers pursuant to § 30-102(c) of the Insurance Article, Annotated Code of Maryland.

While the new chapter was awaiting final adoption, the Commissioner received several inquires regarding the applicability of the new chapter. Several insurers noted that they were not in existence during the slavery era, and neither were their holding companies. These insurers questioned whether they would be required to report pursuant to Insurance Article, § 30-102(a), Annotated Code of Maryland, if the insurer was not in existence prior to 1865. In order to ensure a complete and accurate report, the Commissioner will require all insurers to report pursuant to the new chapter and Title 30 of the Insurance Article.

Any questions regarding this Bulletin should be directed to the Government Relations & Policy Development Unit at (410) 468-2202.

Ralph S. Tyler Insurance Commissioner

By: <u>Signature on file with original document</u>

Tinna Damaso Quigley

Director of Government Relations
and Policy Development

Appendix 3

Responding Insurers That Were In Existence Before 1865

- 1. ACE USA Inc.
- 2. Aetna Inc.
- 3. American International Group, Inc. (AIG)
- 4. AXA Corporate Solutions Life Reinsurance Company
- 5. Baltimore Equitable Society
- 6. CNA Insurance Companies
- 7. Cumberland Insurance Group
- 8. Frederick Mutual Insurance Company
- 9. General Reinsurance Corporation
- 10. Guard Insurance Group
- 11. Harford Mutual Insurance Company
- 12. Harleysville Insurance
- 13. Hartford Financial Services Group
- 14. Infinity Property & Casualty Corporation
- 15. Manhattan Life Insurance Company
- 16. MetLife
- 17. Middlesex Insurance Company
- 18. Middlesex Mutual Assurance Company
- 19. Monumental Life Insurance Company
- 20. MONY Life Insurance Company of America
- 21. National Life Group
- 22. Nationwide Mutual Insurance Company
- 23. New York Life Insurance Company
- 24. One Beacon Insurance Group
- 25. Penn Mutual Life Insurance Company
- 26. The Travelers Companies, Inc.
- 27. Westfield Group



SEP 2 2 2011

Maryland Insurance Administration

Regulatory Affairs Routing WB04F 510 Walnut Street Philadelphia, PA 19106 PO Box 1000 Philadelphia, PA 19105 (215) 640-2489 fax

(215) 640-1716 tel

james.clay@acegroup.com www.acegroup.com

James H. Clav Vice President

September 19, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

Re: Report on Slavery Era Insurance

Dear Sir or Madam:

On behalf of the ACE companies listed on the attached documents, the subject report is respectfully submitted. Please note that based on the information provided in the report, separate electronic documents were not deemed applicable.

Please advise if we can provide any additional information.

Sincerely,

James H. Clay, CPCU

Attachments

Maryland Slavery Report

(1)

(a)

ACE American Insurance Company NAIC #222667

ACE Fire Underwriters Insurance Company NAIC #20702

ACE Property & Casualty Insurance Company NAIC # 20699

Agri General Insurance Company NAIC #42757

Bankers Standard Fire and Marine Company NAIC #20591

Bankers Standard Insurance Company NAIC #18279

Century Indemnity Company NAIC # 20710

Indemnity Insurance Company of North America NAIC #43575

Insurance Company of North America NAIC # 22713

Pacific Employers Insurance Company NAIC #22748

Westchester Fire Insurance Company NAIC # 21121

- (b) 436 Walnut Street P.O. Box 1000 Philadelphia, PA 19105
- (c) (215) 640-1716
- (d) (215) 640-2489
- (e) james.clay@acegroup.com
- (2) (a) Vice President Regulatory Affairs
 - (b) 510 Walnut Street
 WB04F
 P.O. Box 1000
 Philadelphia, PA 19105
 - (c) (215) 640-1716
 - (d) (215) 640-2489
 - (e) james.clay@acegroup.com

(3) Research Methodology

Corporate Historical Background

This filing is being made by ACE USA on behalf of the subsidiaries listed above. Three of those subsidiaries: Insurance Company of North America, ACE Property & Casualty Insurance Company (formerly known as CIGNA Property and Casualty Insurance Company), and earlier known as the Aetna Insurance Company), and Westchester Fire Insurance Company were in existence during the slavery era as defined in Insurance Article, § 30-101, Annotated Code of Maryland.

The Insurance Company of North America ("ICNA") was founded in Philadelphia, Pennsylvania in 1792 and was formally chartered by the Pennsylvania legislature in 1794. It has been in continuous operation since that date, either as an independent company or as a member of an insurance holding company. ICNA was a member of an insurance holding company, the ultimate parent company of which was INA Corporation until 1983 when INA Corporation combined with Connecticut General Corporation to form CIGNA Corporation, which then became the ultimate parent company.

The Aetna Insurance Company ("Aetna Fire"), incorporated in 1819 by the Connecticut Legislature, was chartered to insure against losses by fire. Following another charter amendment in 1850, Aetna Fire organized a "Life and Annuity fund" to write life insurance policies. Another charter amendment by the Connecticut Legislature in 1853 separated the Life and Annuity fund from Aetna Fire and made it an independent corporation named the Aetna Life Insurance Company ("Aetna Life").

Following the division, these two corporations continued to operate their respective business areas. In time, Aetna Fire was acquired by the Connecticut General Corporation, which, as described above, subsequently combined with the INA Corporation to become CIGNA Corporation. In July 1999, CIGNA Corporation sold its property and casualty insurance operation, including both ICNA and Aetna Fire to ACE Limited, which became the ultimate parent of both companies. Aetna Life, which acquired all rights to the trade name "Aetna" in 1989, continues to operate as Aetna, Inc.

Westchester Fire Insurance Company was originally formed as Westchester County Mutual Insurance Company in 1837 and was renamed in 1869. Prior to being acquired by ACE Limited in January, 1998, it was part of the Crum and Forster organization. ACE does not have possession of any of the policy records of Westchester fire prior to the late 1980's, since the liability for those policies had been reinsured and assumed by other Crum and Forster entities as part of Crum and Forster's 1993 restructuring.

Thus, ACE USA is now the successor to three corporations: ICNA, Aetna Fire, and Westchester County Mutual Insurance Company which conducted business during the slavery era.

Records Review

ACE retained the law firm Wolf, Block, Schorr and Solis-Cohen LLP, Philadelphia, Pennsylvania, to assist the Company in its efforts to identify and compile records and information. ACE, through the above counsel, made contacts with archivists and historians from several universities and historical societies and obtained insights on how ACE might most fully identify any responsive data located in its archives. During the course of contacts with various members of the academic community, ACE learned of, and subsequently acquired, a database of information about the transatlantic slave trade published by the Cambridge University Press.

Entitled *The Trans-Atlantic Slave Trade: A database on CD-Rom*, the database is the work of four leading scholars, David Eltis, Stephen D. Behrendt, David Richardson, and Herbert S. Klein. Compiled at the W.E.B. DuBois Institute of Harvard University and funded by the National Endowment for the Humanities, the Mellon Foundation, and the Ford Foundation, the database contains the records of 27,233 transatlantic slave ship voyages made between 1595 and 1866. Recognized as an international database, the archival records contained in the database account for perhaps 70% of the Atlantic slave trade – particularly the voyages between the years 1660 and 1867.

ACE began the process of reviewing historical records it had received from its predecessor corporations. As the principal business of each of the predecessors was property and casualty insurance, ACE's archival records indicate that neither ICNA nor Aetna Fire, ACE's predecessor companies, wrote many life insurance policies. At this time, ACE is not aware of any kind of life insurance policy written by Aetna Fire. ACE's review of the ICNA records indicates that ICNA wrote a limited number of life policies between 1792 and 1819. At this time, ACE believes that none of the individuals named in the ICNA life policies were slaves.

In addition, ACE reviewed ICNA's marine insurance policies to determine whether ICNA ever insured a ship carrying slaves. This research was conducted by first identifying that ACE has in its custody ICNA marine insurance records which span the period from 1792 to 1828. These handwritten historical records contain information on approximately 17, 566 policies written to insure vessels and ship-bound goods and freight. ACE does not have in its possession, nor is it aware of the existence of, any records dating from 1828 to 1865.

When ACE had identified all of the available ICNA marine insurance policies, the Company arranged for each policy to be reviewed. This was an intensive review which took a substantial amount of time and cost in excess of \$125,000. ACE then compared the information contained in the marine insurance records with the information contained in the Harvard Trans-Atlantic Slave database to ascertain whether any of the ACE's insureds were carrying slaves.

This research further confirmed that ICNA did not write insurance policies on any vessel that was carrying slaves.

Although ACE is aware that its duty to disclose only extends to its predecessor corporations, in its efforts to comply fully with the spirit of this request, ACE notes that it has in its possession a photostatic copy of one slave life insurance policy written by Aetna Life in 1855 after its separation from Aetna Fire. This record, which is not from one of ACE's predecessor corporations, came into ACE's possession when a member of the marketing department located the document and copied it.

4. NAMES OF SLAVES

The one slave policy found, which was issued by Aetna Life, which was not related to ICNA of Aetna Fire at the time, insures the life of a man named Peter; he is identified as a laborer. The policy, dated June 1855, was written in the Parish or County of Harrison, State of Mississippi.

5. NAMES OF SLAVE HOLDERS

The above slave policy, which was issued by Aetna Life, which was not related to ICNA or Aetna Fire at the time, was written for a man named Francis Fountain. The policy was written in the Parish or County of Harrison, State of Mississippi.

6. POLICY INFORMATION

A copy of the above slave policy, which was issued by Aetna Life, and which was not related to ICNA OR Aetna fire at the time, is attached to these disclosures.

LIFE DEPARTMENT. AGENCY AT NEW ORLEANS.

AETNA INSURANCE CO., HARTFORD, CONN.

No. [271] ANNUITY FUND, \$150,000 [?]

Exclusively held, pledged and appropriated, with the reserved accumulations, by the Charter and regulations of the Company, to the payment of annuities and losses connected with Life Assurance only ... and in no event to be liable for the other debts, contracts or engagements of the Company.

SLAVE POLICY.

This Policy of Insurance Witnesseth, That THE AETNA INSURANCE COMPANY, in consideration of the sum of [Twenty Six] Dollars, to them in hand paid by [Francis Fountain] Do Insure the Life of the Within-Named Slave or Slaves, for the term of [Three] months, in the amount set opposite his or her name. Loss, if any, payable to [Francis Fountain] for the benefit of [himself] amounting to the total sum of [Eight Hundred] Dollars, according to the Application of said [F. Fountain] bearing date the [15] day of [June] one thousand eight hundred and fifty [five] and deposited in the Office of this Company.

And the said Company do hereby Covenant and Bind Themselves, well and truly to pay to the said [Francis Fountain] of the Parish or County of [Hamf(r?)on] State of [Mississippi] within ninety days after due proof of the death of the within-named Slave, Slaves, or any of them, the amount insured and set opposite the name or names of the deceased, deducting therefrom all indebtedness on this Policy at that time: Provided he, she or they die within the period embraced in this Policy, to wit: From tweive o'clock (at noon) on the [fifteenth] day of [June] one thousand eight hundred and fifty [five], until twelve o'clock (at noon) on the [fifteenth] day of [September] one thousand eight hundred and fifty [five], for which said payment, the said Annuity Fund, with its reserved accumulations is solely and exclusively pledged and appropriated.

[----Given for Policy 264----]

And it is hereby understood and expressly declared to be the true intent and meaning of this Policy, and the same is accepted by the Assured, that if the Application subscribed by the said [F. Fountain] shall be in any respect untrue or incorrectly stated—or if the said Slave or Slaves, or any of them shall die by his, her or their own hands—or by any injury inflicted in an attempt to commit suicide—or by the hands of justice—or in violation of law—or by the hands of a mob—or by foreign invasion—or by an insurrection—or by the neglect, abuse, or maltreatment of the owner, or any one to whom he, she or they shall be entrusted—or shall be laboring under any chronic disease at the time of issuing this Policy—or shall be forced, permitted

or entreated, by his, her or their owner, or by the agent of the owner, to engage in any combat causing his, her or their death—or shall abscond or be kidnapped—or shall, without the consent of this Company previously obtained and endorsed on or attached to this Policy, be taken or permitted to be taken to more Southern localities (if South of the 35 degree North latitude) than that in which insured between the fifteenth day of July and the fifteenth day of November, or engage the said Slave or Slaves in any more hazardous occupations than those enumerated and set opposite his, her or their name or names—or in the event of any previous Insurance, (or subsequent, without the consent of this Company previously obtained and endorsed on or attached to this Policy,) on the life or lives of the within-named Slave or Slaves—then, and in all such cases, the said Company shall not be liable for the payment of the sum insured and set opposite the name or names of the said Slave or Slaves deceased, or any part thereof: and this Policy, so far as relates to said payment, shall be utterly void.

And it is further Agreed, That in every case where this Policy shall cease, or become, or be null or void, all previous payments made thereon shall be forfeited to the said Company. N. B. — This Policy not assignable without the consent of the Company previously obtained and endorsed on or attached thereto.

In Witness Whereof, The said AETNA INSURANCE COMPANY have, by their Vice President and Actuary, signed and executed this Contract at the City of Hartford, This [twenty first] day of [June] one thousand eight hundred and fifty [five] but the same shall not be binding unless countersigned by C. C. Lathrop, Esq., Agent for said Company at New Orleans, Louisiana.

STATEMENT.

Premium, \$[16.00] Extra do. \$[10.00] Examinations, \$[2.50] Policy, \$[1.50] S/ [E. A. Bulkeley] Vice President.

S/ [(?)] Actuary

COUNTERSIGNED this [(?)] day of [June] 185[5].

\$[30.00]

S/[C. C. Lathrop] Agent.

(text on second page)

LIFE DEPARTMENT.

AGENCY AT No. of Application

No. of Policy [271]

SLAVE POLICY.

Aetna Insurance Comp'y Of Hartford, Conn.

Benefit of [F. Fountain]
Date [June 15] 18[55]
Term [One] [Three Months]
No. Insured [One]
Sum Assured [\$800]

Amount of Premium \$[16.00]
Extra [10.00]
Examination [2.50]
Policy [1.50]

\$[30.00]

Register Book [1] Page [122] Expires [Sept. 15] 18[55] Issued [June 15] 18[55] [(Given?) for Policy 264.]

(Continuation of text on second page, but oriented differently)

REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY.

No. Names Age. Value. Amt. Risk. Rates. Premium. Occupation Remarks
On Length of
Residence
South, etc.

[(17)] [Peter] [27] [1100] [800] [3-1/4] [26.00] [Laborer] [See Physicians certificate]

LIFE DEPARTMENT. AGENCY AT NEW ORLEAS.

ÆTNA INSURANCE CO., HARTFORD, CONN.

ANNUITY FUND, \$180,000:

2.4. 12. 63	
This Policy of Insurance	Witnesseth, That THE ETNA INSURANCE COMPANY,
In consuleration of the sum of	Dollars, to them in head paid Out 12 to Do Instead the Life of the within samed Shave on Staves, Se
the term of	months, in the amount set opposite his or her name. Loss, If my, payable to
	benefit of post like 1. 12. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
amounting to the total sum of	Dollars, according to the Application of
will be the first of the first	bearing date the 15 day of 1222
one thousand eight handred and fifty . see L. C.f and de-	eposited in the Office of this Company.
And the said Commonn day	Gereby Covenant and Bind Themselves, well and traly to pag to the mid
	of the Parish or County of Colar At Land
State of	y days after due proof of the death of the within-named Slave, Slaves, or any of these, the amount
	deducting therefrom all indebtedpession this Policy at that time: Provider, he, she or they die
within the period embraced in this Policy, to wit: From twe	ve o clock out more, on the seffection the day of Assel
one thousand eight landred and fifty 9/62 C. until twel	ve o'clock (ot men) on the . Act fill fill hilk day of . A lag 1 1 21 bes
one thous not eight hundred and fifty. Q.Z for which	said payment, the said Annuity Fund, with its reserved accumulations is solely and exclusively
pledged and appropriated	
and a decimal of	d and expressly declared to be the true intent and meaning of this
shall be in any respect antine or inconcerly stated—beg if the inflicted in an attempt to commit suicide—or by the hands of an insurer toon—or by the neglect, abuse, or mathreation of chrome doss ase at the time of issuing this Policy—or shall be in any combat causing his her or their death—or shall absert endorsed on or attached to this Policy, be taken or permitted who hansmed between the lifteenth day of July and the fifter than these competated and set appears his, her or their name that the state of the property of	he Application subscribed by the said
Andrit is further Agreed. T	hat in every case where this Policy shall cease, or become, or be, null or void, all previous par-
to the said thereon, shall be forfeited to the said Compa- cially donor attached thereto.	but in every case where this Policy shall crase, or become, or be, null or void, all previous pay- my. $N,B-T$ his Policy not assignable without the consent of the Company, previously obtained and
In Witness Wheres	f, the and ETNA INSURANCE COMPANY have, by their Vice President and
STATEMENT	As tuary, signed and executed this Contract at the CITY CF HARTFORD, this
Premiun, S. A.C. dill.	day of day of control one thousand
Extra do.	eight hundred and fifty
Examinations,	countersigned by C. C. LATHROP, Esq., Agent for said Company at New ORLEANS,
Policy,	Louisiana
\$ 3 0.00	4. & Bulle Ley Vice President.
	Actuary.
A Commence of the Commence of	1-97-11
COUNTERSIGNED this D. J. day of	Agent.

Actua Insurance Comp SEAVE POBLOY.

Celer : 1100 800 34 26 00 - There certificate) .	NAR	ES.	 AGE	VALUE	Amt. Risk.	Estes.	PREMIGH		OCCUPATION	Ca Longia		
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Morrison & Mallace Ins. Agency Memohis, reun. Nov 28-1947-

.. Thelpley

AFFIRMATION

John J. Lupica affirms and says that he is the President and CEO of ACE American Insurance Company. And certifies and affirms under oath that to his best knowledge and belief the report is true and not misleading and contains the most accurate information available at the time of the submission of the report.

John J. Lupica

Sworn to and subscribed

Before me this ______ day

of <u>lept.</u>, 2011

Notary Public in and for said

My commission expires

County and State

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL Constance A. McFarlane, Notary Public

City of Philadelphia, Phila. County

My Commission Expires February 27, 2013



September 27, 2011

Ms. Tinna Damaso Quigley
Director of Government Relations
Maryland Insurance Administration
Slavery Era Insurance Registry,
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Re: Report of Aetna Inc. COMAR 31.16.09

Dear Ms. Quigley:

This letter and associated documentation is being sent to you pursuant to COMAR 31.16.09, Registry and Report on Slavery Era Insurance, requiring every licensed insurer to provide information, as more particularly described in the regulation. We are submitting an original plus one copy of the reports generated pursuant to COMAR 31.16.09.04 §C of this regulation. In addition, pursuant to §D of COMAR 31.16.09.04, we are including an electronic copy of the information contained in §B(5), (6), and (7) in the PDF electronic format approved by the Commissioner.

B.1. INSURER IDENTIFICATION

I am writing to you on behalf of those Aetna Inc. insurance companies (collectively "Aetna" or "Company") presently authorized and licensed to do business in Maryland. These companies include the following:

NAME	ADDRESS	NAIC CODE	YEAR FORMED	DATE ADMITTED IN MD
Aetna Life Insurance Company ("ALIC")	151 Farmington Ave. Hartford, CT 06156	60054	1853 (CT)	01/01/1897
Aetna Health and Life Insurance Company ("AHLIC")	151 Farmington Ave. Hartford, CT 06156	78700	1971 (CT)	10/01/1981
Aetna Insurance Company of Connecticut ("AICC")	151 Farmington Ave. Hartford, CT 06156	36153	1990 (CT)	07/17/1990
Aetna Health Inc. (PA)	980 Jolly Road Blue Bell, PA 19422	95109	1981 (PA)	12/02/2009
Aetna Dental Inc. (TX)	Three Sugar Creek Center Blvd. Sugarland, TX 77478	95910	1986 (TX)	03/22/2011
Aetna Health Insurance Company ("AHIC")	980 Jolly Road Blue Bell, PA 19422	72052	1938 (PA)	08/15/1974



Thomas A. Young
Chief Compliance Officer
Law & Regulatory Affairs, RC61

(860) 273-7461

Thomas A. Young Chief Compliance Officer Law & Regulatory Affairs, RC61 (860) 273-7461 Fax: (860) 754-9735

September 27, 2011

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Director of Government Relations
Maryland Insurance Administration
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200 St. Paul Place, Suite 2700
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NAME	ADDRESS	NAIC CODE	YEAR FORMED	<u>DATE</u> <u>ADMITTED IN</u>
				<u>MD</u>
Aetna Life Insurance Company	151 Farmington Ave.	60054	1853 (CT)	01/01/1897
("ALIC")	Hartford, CT 06156			
Aetna Health and Life	151 Farmington Ave.	78700	1971 (CT)	10/01/1981
Insurance Company	Hartford, CT 06156			
("AHLIC")				
Aetna Insurance Company of	151 Farmington Ave.	36153	1990 (CT)	07/17/1990
Connecticut ("AICC")	Hartford, CT 06156	[·
Aetna Health Inc. (PA)	980 Jolly Road	95109	1981 (PA)	12/02/2009
	Blue Bell, PA 19422			·
Aetna Dental Inc. (TX)	Three Sugar Creek	95910	1986 (TX)	03/22/2011
1	Center Blvd.			·
	Sugarland, TX 77478			
Aetna Health Insurance	980 Jolly Road	72052	1938 (PA)	08/15/1974
Company ("AHIC")	Blue Bell, PA 19422	_		

b. Property Casualty Business

Aetna sold its property-casualty operation to Travelers in a transaction that closed in 1996. Records and information that Travelers did not take custody of at the time of this sale were subsequently destroyed by Aetna in the ordinary course.

c. ALIC's Corporate History

ALIC is a Connecticut corporation, incorporated by an Act of the Connecticut Legislature in 1853 and was first licensed to write life insurance in Maryland in 1977. ALIC was created to assume the life business written by the Aetna Insurance Company Hartford CT, Annuity Fund. Over the years, it has written participating and non-participating life insurance, term policies, endowment policies and group life.

Effective October 1, 1998, ALIC ceded its individual and sponsored life insurance business to Lincoln Life Insurance & Annuity Company of New York ("LLANY") in an indemnity reinsurance transaction. LLANY also assumed responsibility for the administration of these policies. LLANY's affiliate, The Lincoln National Life Insurance Company ("Lincoln"), acquired all of ALIC's non-New York individual and sponsored life business. Accordingly, LLANY/Lincoln took possession of documents and computerized information pertaining to all of ALIC's policies. As part of the transaction LLANY/Lincoln offered employment to most of the Aetna employees who worked in the individual life area. ALIC continues to write group life, disability, long-term care, and health benefits coverage.

d. AHLIC's Corporate History

AHLIC is a Connecticut corporation, incorporated on August 19, 1971 as Aetna Life Insurance Company of Illinois. It was subsequently renamed on February 2, 1996. AHLIC currently reinsures ALIC long term disability business, run-off accident and health business still on the books, group life insurance, and immaterial amounts of group health insurance.

e. AICC Corporate History

AICC is also a Connecticut corporation incorporated, on January 3, 1990 as Aetna Casualty Company. It was subsequently renamed on May 24, 1996. AICC's business purpose is the writing and reinsuring of group insurance casualty products. The corporation writes specialized coverages in connection with group insurance plans. These coverages will include, but may not be limited to, "true group" automobile insurance, contractual liability ("stop loss") insurance and pet insurance.

f. Aetna Health Inc. (PA) Corporate History

Aetna Health Inc. (PA) is a Pennsylvania corporation, incorporated on May 7, 1981 as United States Health Care System, Inc. It went through several name changes: United States Health Care Systems, Inc. (8/25/81-1/16/83), United States Health Care Systems of Pennsylvania, Inc. (1/17/83-4/30/2002), until its current name, Aetna Health Inc. (4/30/2002-present). Aetna Health

Inc. (PA) is a health maintenance organization that is currently authorized to do business in the state of Maryland and eighteen other states.

g. Aetna Dental Inc. (TX) Corporate History

Aetna Dental Inc. (TX) is a Texas corporation, incorporated on February 11, 1986 as Aetna Dental Care of Texas, Inc. It had a name change, Aetna U.S. Healthcare Dental Plan Inc. (7/16/97-4/30/2002), 4/30/2002), until its current name, Aetna Dental Inc. (4/30/2002-present). Aetna Dental Inc. (TX) is a health maintenance organization offering a single service health plan (dental) that is currently authorized to do business in the state of Maryland and three other states.

h. AHIC Corporate History

AHIC is a Pennsylvania corporation and authorized to do write health and life insurance in the state of Maryland and forty-six other states. It was incorporated as Omaha Hospital and Life Insurance Company (7/8/38 – 8/1/77) and wend through several name changes: Omaha Financial Life Insurance Company 8/1/77-2/10/93, Corporate Health Insurance Company 2/10/93 – 1/1/08, and ultimately as Aetna Health Insurance Company (1/1/08-present).

i. Scope of Review and Document Availability

Due to the information provided in Subsections "a" through "h", above, this report will focus on ALIC, the only Aetna subsidiary that was in existence during the slavery era. Aetna has engaged in an extensive search for the policies, policyholders and insureds specified in the Regulation.

The team conducted a thorough review of potentially relevant practices of all Aetna companies that issued life insurance anywhere in the United States. The team members reviewed all pertinent documents in Aetna's possession, and communicated with LLANY/Lincoln and ING for all potentially applicable materials. Considering the transactions described above, it is best to divide the explanation of ALIC's review into three parts: materials and information still located within Aetna, those transferred to LLANY/Lincoln, and those in possession of ING.

1. Aetna Materials

Aetna's extensive internal search included, but was not limited to, the following:

- a search to locate the records, files and other information requested by the Regulation and to determine the extent, location and nature of Aetna's business activity and operations from the slavery era;
- a search of Aetna's archives performed by several Aetna employees; materials reviewed included: historical policies, annual reports, Aetna publications, rate books, agent instruction manuals, policy registers, communications to agents, marketing materials, applications, etc.;
- retention of a professional archivist with expertise in 19th Century documents to review historical documents;
- a search of records housed at the College of Insurance, New York, NY;

- communications with Aetna's complaint units in order to ascertain any pending claims or assertions of claims (or other correspondence relating to this issue generally);
- communications with relevant managers and other personnel located throughout the Aetna organization in order to determine the existence, or lack thereof, of the files, records and other materials sought under this Regulation;
- a query of a law department data base of types of matters and cases;
- discussions with Aetna's archival storage vendor, Iron Mountain, which maintains some
 additional records on Aetna's behalf, as well as review of all identifiable "Life Insurance"
 documents retrieved from Iron Mountain. In 1994, when Iron Mountain's predecessor, Pierce
 Leahy, took over the document storage function from Aetna, a large amount of life related
 materials was destroyed in the ordinary course of business and within the guidelines of
 Aetna's document retention policy;
- data base searches of claims information and other records not previously discarded in the ordinary course of business prior to passage of this Regulation.
- communications with the South Carolina Historical Society ("SCHS") since it was reported by BestWire, a wire service for the insurance industry, that they had documents that reveal that ALIC wrote in 1856 a \$600 policy on Sabrina, the 24 year-old slave of one Thomas P. Allen. We requested and received a copy of the policy from SCHS.

The search described above resulted in materials listed in Part 4, below.

2. LLANY/Lincoln Materials

We spoke to former Aetna employees now employed at Lincoln who have knowledge of Aetna's individual life business who informed us that the administrative data base that tracks all of the former Aetna life insurance policies does not contain any policies from the slavery era. The system automatically deletes the files after the policies have terminated. Since the time frame is over 136 years ago, no life records would exist either in paper format or electronically.

To verify this understanding, a query was developed and run using this database. The results produced an extract that listed the oldest policy as one dated in 1923.

LLANY/Lincoln also conducted a search of records housed at Iron Mountain that were transitioned from Aetna at the time of the indemnity reinsurance transaction. After reasonable efforts and due diligence, they were not able to identify any additional records relating to slave policies.

3. ING Materials

We also communicated with former Aetna employees who are now employed by ING. These individuals confirmed that any and all responsive individual life materials would be located at LLANY/Lincoln, Iron Mountain or in the Aetna archives.

B.4. IF NO RESPONSIVE DATA

Not applicable.

B.5. NAMES OF SLAVES

Please note that Aetna has located seven policies some of which cover multiple lives. In most instances, we have no record of the last name of the insured.

Five of the policies mentioned below were found in the archives of Aetna Inc. and these are Aetna Insurance Company Annuity Fund policies, numbers 37, 44, 107, 158 and 271. Two of the policies mentioned below were obtained from outside sources: Aetna Life Insurance Co. Policy No. 60, from the South Carolina Historical Society and Aetna Insurance Company Annuity Fund, Policy Number 128 (only face page), from "Finding a Place Called Home" by Dee Parmer Woodtor, Ph.D.

Aetna also identified one record which could not be read with confidence because of the antiquity of the handwritten script. It is a record of Aetna Life Insurance Company's Board of Directors Meetings titled "Minute Book No. 1 to 1875 Aetna Life Insurance Company" ("Minute Book"). The Minute Book is a record of the monthly meetings of ALIC's Board of Directors and is handwritten in 1800's penmanship. In 2002, Aetna retained a professional archivist with expertise in 19th Century documents to review the Minute Book and other materials in order to ascertain whether there were any references to slave policies. She uncovered a reference on page 70 of the Minute Book for the Regular Meeting, November 22, 1858 that is translated to read as follows, "Slave Policy No. 35. Charleston agency, Negro Abel ins'd \$800, approved Oct. 5th payable Jany 5th..." We have not been able to locate this policy, nor do we expect to find it.

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	<u>f)</u> <u>ST.</u>	g) OTHER INFO.
Edwards	Stephen	S. B. Nollner	S. B. Nollner	Petersburg	VA	Aetna Insurance Co. Slave Policy No. 107 May 13, 1856 Age 32; Occupation: Laborer

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
Miles	William	Thomas Murphy	Thomas Murphy	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 Feb. 10, 1855 New Orleans, LA Age 28; Occupation: Drayman
	Abel			Charleston	NC	Slave Policy No. 35* Charleston agency, Negro Abel ins'd \$800, approved Oct. 5 th payable Jany 5 th
	Amanda	Charles Meyer	Charles Meyer	St. Francis County	MO	Aetna Insurance Co. Slave Policy No. 44 Jan. 13, 1860 Age 15; Occupation: Housegirl
	Ann	Charles Meyer	Charles Meyer	St. Francis County	MO	Aetna Insurance Co. Slave Policy No. 44 Jan. 13, 1860 Age 15; Occupation: Housegirl

^{*} As mentioned in the preceding paragraph, we do not have a copy of the actual policy, just a reference in the Minute Book to the slave name, but not the name of the policy holder or beneficiary.

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
	Ben	John S. Primm	John S. Primm	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37
						Nov. 12, 1857 Age 13; Occupation: House Servant
	Hannah	John S. Primm	John S. Primm	St. Louis	МО	Aetna Insurance Co. Slave Policy
						No. 37 Nov. 12, 1857 Age 45; Occupation: Cook
	Henry	Charles Meyer	Charles Meyer	St. Francis County	МО	Aetna Insurance Co. Slave Policy No. 44
•						Jan. 13, 1860 Age 19; Occupation: Blacksmith
	John	Thomas Murphy	Thomas Murphy	Orleans	LA	Aetna Insurance Co.
						Slave Policy No. 158 Feb. 10, 1855 New Orleans, LA Age 23; Occupation: Drayman
	Martha	Charles Meyer	Charles Meyer	St. Francis County	MO	Aetna Insurance Co. Slave Policy No. 44 Jan. 13, 1860 Age 14; Occupation: Housegirl

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
	Mary Jane	John S. Primm	John S. Primm	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 10; Occupation: Nurse
	Nancy	John S. Primm	John S. Primm	St. Louis	MO	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 16; Occupation: House Servant
	Peter	Francis Fountain	Francis Fountain	Orleans	LA	Aetna Insurance Co. Slave Policy No. 271 June 21, 1855 New Orleans, LA Age 27; Occupation: Laborer
	Polly	John S. Primm	John S. Primm	St. Louis	MO	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 18; Occupation: Nurse
	Reuben	Thomas Murphy	Thomas Murphy	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 Feb. 10, 1855 New Orleans, LA Age 22; Occupation: Drayman

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
	Sabrina	Thomas P. Allen	L.M. and E.E. Hatch	Charleston	SC	Aetna Life Insurance Co. Slave Policy No. 60 Aug. 11, 1856 Age 24; Occupation: Washer
	Sanford	John S. Primm	John S. Primm	St. Louis	MO	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 19; Occupation: Farm Hand

In addition to the policies mentioned above, we have located a claim register, (titled "Loss Book No. 1") that indicates the issuance of six additional policies (Numbers 61, 64, 75, 86, 94 and 109), that we have not been able to locate, nor do we expect to find them, or to discover any other relevant insurance policies in the company's records. The Loss Book includes only the names of the insureds (which we are assuming to be the name of the slaves) and beneficiaries.

a) INSURED LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/POLIC YHOLDER	c) BENEFICIARY	c) COUNTY	d) STATE	e) OTHER INFO.
Booth	Jack	Unknown	Chas. J. Cabares, Trustee by James Chienes, Atty	Petersburg	VA	Slave Policy 61 July 18, 1854
Eppes	Cornelius	Unknown	William H. Beasley	Petersburg	VA	Slave Policy 109 October 27, 1856
Brown	Daniel	Unknown	D. H. Shular	Montgome ry	AL	Slave Policy 86 February 4, 1859
Ash	William	Unknown	Jos. Sampson, Assignee	Charleston	SC	Slave Policy 64 June 30, 1854

a) INSURED LAST NAME	b)FIRST NAME	c) SLAVE- HOLDER/POLIC YHOLDER	c) BENEFICIARY	c) COUNTY	d) STATE	e) OTHER INFO.
Harnes	Emma	Unknown	Henry Harnes	Charleston	SC	Slave Policy 75 October 5, 1859
Hubbell	Sarah	Unknown	E. C. Hubbel	Montgome ry	AL	Slave Policy 94 January 18, 1860

B.6. NAMES OF POLICY HOLDERS

a) LAST NAME	b) FIRST NAME	e) COUNTY	d) STATE	e) OTHER INFO.
Allen	Thomas P.	Charleston	SC	Aetna Life Insurance Company Slave Policy No. 60 August 11, 1856
Fountain	Francis	Orleans	LA	Aetna Insurance Co. Slave Policy No. 271 June 21, 1855, New Orleans, LA
Meyer	Charles	St. Francis	MO	Aetna Insurance Co. Slave Policy No. 44 January 13, 1860
Murphy	Thomas	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 February 10, 1855 New Orleans, LA
Nollner	S. B.	Petersburg	VA	Aetna Insurance Co. Slave Policy No. 107 May 13, 1856
Primm	John S.	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37 November 12, 1857
Raby	Mary	Orleans	LA	Aetna Insurance Co. Slave Policy No. 128 October 15, 1853* New Orleans, LA

^{*} As mentioned above, the face page of this policy was copied from a book called "Finding a Place Called Home" by Dee Parmer Woodtor, Ph.D. There was no underlying information regarding the covered lives of slaves for this policy.

B.7. POLICY INFORMATION

Attached please find copies of all records and documents regarding insurance policies issued to slaveholders that provided coverage for injury to or death of slaves.

As noted above, we do not have copies of the policies associated with the six policies itemized in Loss Book #1 (umbers 61, 64, 75, 86, 94 and 109). Due to the age, delicate condition and irregular size of the Loss Book, it would be impractical to try and copy the responsive pages for inclusion in this report. Instead, we are including a transcription of the responsive data contained in the claim register.

As required by the Regulation, ALIC is including a properly executed certification. We are also submitting the requisite two copies of this report (an original plus one copy) and the electronic copy of the information contained in §B(5), (6), and (7) in the PDF electronic format approved by the Commissioner on the enclosed diskette.

Very truly yours,

Thomas A. Young

Attachments

CERTIFICATION/AFFIRMATION

STATE OF CONNECTICUT)

)SS

COUNTY OF HARTFORD)

Thomas A. Young. first being duly sworn, deposes and says that he is the Vice President and Chief Compliance Officer of Aetna Life Insurance Company, the company preparing and filing the this report; that this report is being filed pursuant COMAR 31.16.09.03(B) and that it is (1) true and not misleading; and (2) contains the most accurate information available at the time of the submission of the report.

Thomas A. Young(

Vice President and Chief Compliance Officer

Subscribed and sworn to before me this

day of September, 2011.

Notary Public in and for said County and State

Christine E. Deotte

Notary Public

My Commission Expires Aug. 31, 2013

My commission expires August 31, 20

AETNA

B.5. NAMES OF SLAVES

Please note that Aetna has located seven policies some of which cover multiple lives. In most instances, we have no record of the last name of the insured.

Five of the policies mentioned below were found in the archives of Aetna Inc. and these are Aetna Insurance Company Annuity Fund policies, numbers 37, 44, 107, 158 and 271. Two of the policies mentioned below were obtained from outside sources: Aetna Life Insurance Co. Policy No. 60, from the South Carolina Historical Society and Aetna Insurance Company Annuity Fund, Policy Number 128 (only face page), from "Finding a Place Called Home" by Dee Parmer Woodtor, Ph.D.

Aetna also identified one record which could not be read with confidence because of the antiquity of the handwritten script. It is a record of Aetna Life Insurance Company's Board of Directors Meetings titled "Minute Book No. 1 to 1875 Aetna Life Insurance Company" ("Minute Book"). The Minute Book is a record of the monthly meetings of ALIC's Board of Directors and is handwritten in 1800's penmanship. In 2002, Aetna retained a professional archivist with expertise in 19th Century documents to review the Minute Book and other materials in order to ascertain whether there were any references to slave policies. She uncovered a reference on page 70 of the Minute Book for the Regular Meeting, November 22, 1858 that is translated to read as follows, "Slave Policy No. 35. Charleston agency, Negro Abel ins'd \$800, approved Oct. 5th payable Jany 5th..." We have not been able to locate this policy, nor do we expect to find it.

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	<u>f)</u> <u>ST.</u>	g) OTHER INFO.
Edwards	Stephen	S. B. Nollner	S. B. Nollner	Petersburg	VA	Aetna Insurance Co. Slave Policy No. 107 May 13, 1856 Age 32; Occupation: Laborer
Miles	William	Thomas Murphy	Thomas Murphy	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 Feb. 10, 1855 New Orleans, LA Age 28; Occupation: Drayman

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	<u>f)</u> <u>ST.</u>	g) OTHER INFO.
	Abel			Charleston	NC	Slave Policy
					Į.	No. 35*
						Charleston
					ļ	agency, Negro
						Abel ins'd
					ļ	\$800,
1						approved Oct.
						5 th payable Jany 5 th
	Amanda	Charles Meyer	Charles Meyer	St. Francis	MO	Aetna
	Allialida	Charles Meyer	Charles Meyer	County	MO	Insurance Co.
				County		Slave Policy
						No. 44
						Jan. 13, 1860
						Age 15;
						Occupation:
						Housegirl
	Ann	Charles Meyer	Charles Meyer	St. Francis	MO	Aetna
				County		Insurance Co.
						Slave Policy
						No. 44 Jan. 13, 1860
					1	Age 15;
						Occupation:
,					1	Housegirl
	Ben	John S. Primm	John S. Primm	St. Louis	MO	Aetna
					1	Insurance Co.
						Slave Policy
					1	No. 37
						Nov. 12, 1857
					1	Age 13;
						Occupation:
L	L	L	<u> </u>	<u> </u>	<u> </u>	House Servant

^{*} As mentioned in the preceding paragraph, we do not have a copy of the actual policy, just a reference in the Minute Book to the slave name, but not the name of the policy holder or beneficiary.

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
	Hannah	John S. Primm	John S. Primm	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 45; Occupation: Cook
	Henry	Charles Meyer	Charles Meyer	St. Francis County	MO	Aetna Insurance Co. Slave Policy No. 44 Jan. 13, 1860 Age 19; Occupation: Blacksmith
	John	Thomas Murphy	Thomas Murphy	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 Feb. 10, 1855 New Orleans, LA Age 23; Occupation: Drayman
	Martha	Charles Meyer	Charles Meyer	St. Francis County	МО	Aetna Insurance Co. Slave Policy No. 44 Jan. 13, 1860 Age 14; Occupation: Housegirl
	Mary Jane	John S. Primm	John S. Primm	St. Louis	MO	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 10; Occupation: Nurse

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
	Nancy	John S. Primm	John S. Primm	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 16; Occupation: House Servant
	Peter	Francis Fountain	Francis Fountain	Orleans	LA	Aetna Insurance Co. Slave Policy No. 271 June 21, 1855 New Orleans, LA Age 27; Occupation: Laborer
	Polly	John S. Primm	John S. Primm	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 18; Occupation: Nurse
	Reuben	Thomas Murphy	Thomas Murphy	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 Feb. 10, 1855 New Orleans, LA Age 22; Occupation: Drayman
	Sabrina	Thomas P. Allen	L.M. and E.E. Hatch	Charleston	SC	Aetna Life Insurance Co. Slave Policy No. 60 Aug. 11, 1856 Age 24; Occupation: Washer

a) LAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICYHOLDER	c) BENEFICIARY	e) COUNTY	f) ST.	g) OTHER INFO.
	Sanford	John S. Primm	John S. Primm	St. Louis	MO	Aetna Insurance Co. Slave Policy No. 37 Nov. 12, 1857 Age 19; Occupation: Farm Hand

In addition to the policies mentioned above, we have located a claim register, (titled "Loss Book No. 1") that indicates the issuance of six additional policies (Numbers 61, 64, 75, 86, 94 and 109), that we have not been able to locate, nor do we expect to find them, or to discover any other relevant insurance policies in the company's records. The Loss Book includes only the names of the insureds (which we are assuming to be the name of the slaves) and beneficiaries.

a) INSURE DLAST NAME	b) FIRST NAME	c) SLAVE- HOLDER/ POLICY HOLDER	c) BENEFICIARY	c) COUNTY	d) STATE	e) OTHER INFO.
Booth	Jack	Unknown	Chas. J. Cabares, Trustee by James Chienes, Atty	Petersburg	VA	Slave Policy 61 July 18, 1854
Eppes	Cornelius	Unknown	William H. Beasley	Petersburg	VA	Slave Policy 109 October 27, 1856
Brown	Daniel	Unknown	D. H. Shular	Montgom ery	AL	Slave Policy 86 February 4, 1859
Ash	William	Unknown	Jos. Sampson, Assignee	Charleston	SC	Slave Policy 64 June 30, 1854
Harnes	Emma	Unknown	Henry Harnes	Charleston	SC	Slave Policy 75 October 5, 1859
Hubbell	Sarah	Unknown	E. C. Hubbel	Montgom ery	AL	Slave Policy 94 January 18, 1860

AETNA

B.6. NAMES OF POLICY HOLDERS

a) LAST NAME	b) FIRST NAME	c) COUNTY	<u>d)</u> <u>STATE</u>	e) OTHER INFO.
Allen	Thomas P.	Charleston	SC	Aetna Life Insurance Company Slave Policy No. 60 August 11, 1856
Fountain	Francis	Orleans	LA	Aetna Insurance Co. Slave Policy No. 271 June 21, 1855, New Orleans, LA
Meyer	Charles	St. Francis	MO	Aetna Insurance Co. Slave Policy No. 44 January 13, 1860
Murphy	Thomas	Orleans	LA	Aetna Insurance Co. Slave Policy No. 158 February 10, 1855 New Orleans, LA
Nollner	S. B.	Petersburg	VA	Aetna Insurance Co. Slave Policy No. 107 May 13, 1856
Primm	John S.	St. Louis	МО	Aetna Insurance Co. Slave Policy No. 37 November 12, 1857
Raby	Mary	Orleans	LA	Aetna Insurance Co. Slave Policy No. 128 October 15, 1853* New Orleans, LA

^{*} As mentioned above, the face page of this policy was copied from a book called "Finding a Place Called Home" by Dee Parmer Woodtor, Ph.D. There was no underlying information regarding the covered lives of slaves for this policy.

LIFE DEPARTMENT. AGENCY AT Saint Sous Mo.

ÆTNA INSURANCE CO., HARTFORD, CONN.



ANNUITY FUND, \$150,000;



Exclusively held, pledged and appropriated, with its reserved accumulations, by the Charter and regulations of the Company, to the payment of annuities and losses connected with Life Assurance only...and in no event to be liable for the other debts, contracts or engagements of the Company.

BLAVE POLICY.

This Policy of Insurance Witnesseth, That THE ÆTNA INSURANCE COMPANY,
In consideration of the sum of th
by Mufas. Charles Muyer for Do Insure the Life of the Within-Named Slave of Slaves, for
the term of
Charles Muyer for the benefit of Charles Muyer for
amounting to the total sum of . I have . Misous and . One . Hundard fifty Dollars, according to the application of
said Charles Meyer (19) bearing date the theater with day of Lanuary
one thousand eight hundred and any
And the said Company do hereby Covenant and Bind Themselves, well and truly to pay to the said
Charles Meyer 10 of the Parish or County of St. Franceis
State of
insured and set opposite the name or names of the deceased, deducting therefrom all indebtedness on this Policy at that time: Provided, he, she or they die
within the period embraced in this Policy, to wit: From twelve o'clock (at noon) on the Muslimiths day of day of day of
one thousand eight hundred and and starty until twelve o'clock (at noon) on the Minteenth day of March
one thousand eight hundred and sees. See If. for which said payment, the said Annuity Fund, with its reserved accumulations is solely and exclusively
pledged and appropriated.
And is hereby understood and expressly declared to be the true intent and meaning of this
Policy, and the same is accepted by the Assured, that if the Application subscribed by the said. All the said shall be in any respect untrue or incorrectly stated—or if the said Slave or Slaves, or any of them shall die by his, her or their own hands—or by any injury inflicted in an attempt to commit suicide—or by the hands of justice—or in violation of law—or by the hands of a mob—or by a foreign invasion—or by an insurrection—or by the neglect, abuse, or maltreatment of the owner, or any one to whom he, she or they shall be entrusted—or shall be laboring under any chronic disease at the time of issuing this Policy—or shall be fored, permitted or entreated, by his, her or their owner, or by the agent of the owner, to engage in any combat causing his, her or their death—or shall abscond or be kidnapped—or shall, without the consent of this Company previously obtained and endorsed on or attached to this Policy, be taken or permitted to be taken to more Southern localities (if South of the 35th degree North latitude) than that in which insured, between the fifteenth day of July and the fifteenth day of November, or engage the said Slave or Slaves in any more hazardous occupations than those enumerated and set opposite his, her or their name or names—or in the event of any previous Insurance, (or subsequent, without the consent of this Company previously obtained and endorsed on or attached to this Policy,) on the life or lives of the within-named Slave or Slaves—then, and in all such cases, the said Company shall not be liable for the payment of the sum insured and set opposite the name or names of the said Slave or Slaves deceased, or any part thereof; and this Policy, so far as relates to said payment, shall be utterly void.
And it is further Agreed, That in every case where this Policy shall cease, or become, or be. null or void. all previous payments made thereon, shall be forfeited to the said Company. N. B.—This Policy not assignable without the consent of the Company, previously obtained and endorsed on or attached thereto.
In Witness Whereof, The said ÆTNA INSURANCE COMPANY have, by their Vice President and
STATEMENT; Actuary, signed and executed this Contract at the CITY OF HARTFORD, this
Premium, 35 65. Austrenth day of January one thousand
Extra do but the same shall not be binding unless
Examinations,
Policy, 1.00 at Daint Louis allow.
54. 65 OM N. Suymon Actuary.
COUNTERSIGNED this 13 day of January 1830 avid Arbishoft Agent.

REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY

NO.	NAMES.	AGE.	VALUE.	Amt. Risk.	Rates.	PREMIUM:	OCCUPATION:	REMARKS On Length of Residence Sc
	Henry	19	1200	900	3/4	/ /	Black Smith	hot Lusura a small for I
	martha	14	1000	750	4	5 63	House Girl	
	ann	15	1.000	450	И	5 63		
į.	amanda	15	1.000	750		5 63		
1		i		3.150	1.5	23 64		
	St Louis San	eus	og 2	(18 26	60	a colum	les Mezer of h	and the hou
2	of removery !	u	abor	e m	nl	rong s	laves, any or a lieg, by the menal	el of them
¥	Dout Survey ;	tu	escest	Regie	of	this po	rider they are no	mode of to
							injers - on the s	
	veganie - The		omp	any .	vel	e not le	me, accounty to	Pensequences 2
	mentioned Har	us	roho;	have.	not	been ?	vaere steel	Wishop a
		<u> </u>			<u> </u>	.,.		

LIFE DEPARTMENT.

EY AT Saint Louis

No. of Application 44 No. of Policy 44

SLAVE POLICY.

Aetna Insurance Comp'y, of Hartford, conn.

Expires March 13 1860.

Issued January 13 1860.

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LIFE DEPARTMENT. AGENCY AT Daint Souis oldo.

ÆTNA INSURANCE CO., HARTFORD, CONN.



ANNUITY FUND, \$150,000;



Exclusively held, pledged and appropriated, with its reserved accumulations, by the Charter and regulations of the Company, to the payment of annuities and losses connected with Life Assurance only...and in no event to be liable for the other debts, contracts or engagements of the Company.

SLAVE POLICZ.

This Policy of Insurance	Witnesseth, That THE ÆTNA INSURANCE COMPANY,
In consideration of the sum of Sizela Sew.	Dollers to them in hand paid
by John & Fisher	
the term of Jullul	months, in the amount set opposite his or her name. Loss, if any, payable to
John & Dames for the	benefit of John & Primm
amounting to the total sum of I went;	wen Aundrew Stiff Dollars eccording to the Application of
said John S. Finhen	bearing date the Twellfth day of Movembeer
one thousand eight hundred and fifty. Allulm. and dep	• •
And the said Company do	hereby Covenant and Bind Themselves, well and truly to pay to the said
	days after due proof of the death of the within-named Slave, Slaves, or any of them, the amount
	deducting therefrom all indebtedness on this Policy at that time: PROVIDED, he, she or they die
within the period embraced in this Policy, to wit: From twelve	e o'clock (at noon) on the . I welfth day of Moaemlew
one thousand eight hundred and fifty MMM. until twelv	e o'clock (at noon) on the Tweelfth day of November
one thousand eight hundred and fifty for which s	aid payment, the said Annuity Fund, with its reserved accumulations is solely and exclusively
pledged and appropriated. •	
And it is hereby understood	and expressly declared to be the true intent and meaning of this
shall be in any respect untrue or incorrectly stated — or if the inflicted in an attempt to commit suicide—or by the hands of an insurrection — or by the neglect, abuse, or maltreatment of the chronic disease at the time of issuing this Policy—or shall be in any combat causing his, her or their death — or shall absconendorsed on or attached to this Policy, be taken or permitted twhich insured, between the fifteenth day of July and the fifteen than those enumerated and set opposite his, her or their name Company previously obtained and endorsed on or attached to the state of the state	Application subscribed by the said
And it is further Agreed, The ments made thereon, shall be forfeited to the said Companiendorsed on or attached thereto.	at in every case where this Policy shall cease, or become, or be. null or void. all previous pay- y. N. B.—This Policy not assignable without the consent of the Company, previously obtained and
In Witness Whereof	The said ÆTNA INSURANCE COMPANY have, by their Vice President and
STATEMENT:	Actuary, signed and executed this Contract at the CITY CF HARTFORD, this
Premium, \$	I welfth day of Menewelett one thousand
Extra do.	eight hundred and fifty. It is but the same shall not be binding unless
Examinations,	at David Sawa 2000.
\$ 18.75	Som M. Supmone Actuary.
COUNTERSIGNED thisday of	houseben 85 y avid Y Barroh Agent.

AGENCY AT Saint South Agra

No. of Application 3.7. No. of Policy 3.7.

SLAVE POLICY.

Actna Insurance Comp'y, of Hartford, conn.

Benefit of John & Panner

Date November 12 18.57

Term Twelve Menths

No. Insured

Sum Assured

\$2750

Amount of Premium

Extra

Examination

Policy

Register Book | Page 9

Expires November 12 18.58

Issued Roventeer 12 1857

REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY.

NAMES.	AGE.	VALUE.	Amt. Risk.	Rates.	PREMI	UM:	OCCUPATION	REMARKS On Length of Residence South, etc.
nary Lane	10	400	300	29	66	11	Tune	
Polley	18	900	600	2/2	15	"	//	
Ben	1 1	1	1	2	8	17	House Servand	- "
unferd	19	900	700	2/2	17	20	Farm Hand	
Tannah.	45	400	250	41	2//	25	Cook	<u>-</u>
nen eg	16	800	500	2	/0	ĸ	House Serven	
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	nan Lane Polly Ben unferd	Rang Lane 10 Polly 18 Ben 13 unferd 19 Formah 48	Rang Lane 10 400 Polly 18 900 Ben 13 500 unferd 19 900 Formah 45 400	nan Lane 10 400 300 Polly 18 900 600 Ben 13 500 400 unferd 19 900 700 Vannah 48 400 250	nang Lane 10 400 300 29 Polly 18 900 600 2/2 Ben 13 500 400 2 unferd 19 900 7002/2 Yournah 48 400 250 41	nang Lane 10 400 300 2% 6 Polly 18 900 600 2/2/5 Ben 13 500 400 2 8 unferd 19 900 7002/217 Yournah 45 400 250 4/211	nang Lane 10 400 300 2 % 6 6 " Polly 18 900 600 2 1/2 15 " Ben 13 500 400 2 8 " unferd 19 900 7002 17 50 4 onnah 48 400 250 41/211 25	nang Lane 10 400 300 2% 6 6 " Prime Polly 18 900 600 2/2/5" " Ben 13 500 400 2 8 " Home beround unferd 19 900 7002/2 17 80 Farm Hand Younah 48 400 250 4/2/1 25 Cook

Megalar muting Nov Sth 1858 Fromt MonStalkely, If almor of Each and hand at this dah- \$4, 15-21, 71, Paleis asud Smin bush mukning 4. Iroms on some \$1/8 23 applications need some but muting O Budens Luff Legalar muling for 10th 1858 The mt Am Bulley. Cust on Simol Star Sale \$3,774.4 Sholine asind dring the with, the ruminis on which amountet To Endered Sul Augular Huting Trav 22h 185-8. Walke of Drichow fresent Bush on I and Skin dute \$1500 Elwinfalicie aind Smin last muting froming on Same amounting fog of is outstanding loss of, police #3229+3413 It of young, As vale Somesaille Ohis, approved how be Mayable Tely all Lave holing 35. Charleston agency, nigo abel mil food, approved och 5-the play also Omy to a clami under Paling, E & That, of Meridan, contratted, policy was yor fivor, buil all outstanding lases to the date

ÆTNA LIFE INSURANCE COMPANY,

OF HARTFORD, CONN.

No. 60

CALITAL SIEC. COO.

S. C. ENSTORICAL SOCIETY
PERMISSION IS REQUIRED FOR
DUPLICATION OR PUBLICATION

BULLOUS POSTORS.

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In consideration of the same of	Linklass, to them in hand point
my day a stance of the stance of the stance of	To the laster the last of the writin-pancy Stive of Bearing for
the term of the left of the total	toonthe, in the amount an opposite his or her name. Loos, if one, payable to
The Contract of the start of th	runth at L MA to 6 Materia
monuting to the total sink of the Control of the Co	Dollars, seconding to the application of
will A The Carlotte of the contract	Marting date the day of All 212 2
one thursa designs hundred and thry,	wited in the Office of this Company.
And the paid Company do	hereby Covenant and Bind Chemoelves, well und truly in pay to the and
CI allen Brishers	The Print or County of Set Police Contract
State of . Life flee A hericar within mosty days	after the proof of the death of the within-named Share, Slaves, or any of them, the amount
insured and actopiquate the name or names of the decessal, de	educting therefrom all includences on this Policy at that time: Parietinan, i.e., she, or they the
within the period embraced in this Pelicy, to wit: From two	ire a clock (at noon) on that
one thousand night hundred and fitty. A. Kifer until	twelve wichech (at noon) on the
the thousand eight hundred and fifty, E.S. A	•
And it is hereby understood un	d expressly doclared to be the true lutent and meaning of this
under may r histoile ducates at the time of Pasting Into United America, in congagin in any conduct ransing his, her or their drawfordsty additional and endorsed on or attached in this Pedicy, i North Latifully Itina that in which instead, hetween the life any more hazardone occupations have lines entities related subsequent, without the numeral of this Category previous Nave or Slaves—they, and to all duly cases, the said Conquision of the said Slaves or Mayes ducesed, or any part theristi; and	and of Jindice—or in violation of law—or by the hunds of a neck—or by a foreign invasion—and of the swiner, or any one to whom he, also or they shall be interested, or shall be interested, or any one to whom he, also or they shall be interested, or about the interested of a new parts of the characters of the characte
tuined and endersed un ar officiel thristo.	e. c.— i ma coung has assignante termant increates in the Contemporary, preciously ab-
In witness whereof, The said	HETNA LIFE INSURANCE COMPANY base, by their President and
STATEMENT:	Secretary, signed and executed this Contract at the CITY CF HARTFORD, this
Persaintes.	the of the state o
Extra de.	eight hundred and fifty. The traine and the same and too be binding nulsan
Bannina	chantenaigned by Arrivania Agent for said Company
Paliry,	and harmed him and harman
15.50	Tandon.
COUNTERSIGNED this	of Angles to Miller grange of

REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY.

Ya.	NAMES	Age. Value.	Am'i Xiek, Raine		occupation.	HENARES Could be the second of
(delina	24800	600 2/4	1550	Mashen.	Type Challe
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8 C. HISTORICAL SOCIFTY PERMISSION IS REQUIRED FOR DUPLICATION OR PUBLICATION

No. of Policy, 60.
TOLLOG EVALE
Actua Life Insurance Company,
OF HARTFORD, CONN.
Date Angres 11 th 18 FG.
No. Insured One
Sam Assured 8 6.00
Amount of Premium
Extrá
Examination
l'olicy 8 / 5.50
Register Book Page / 185B

No. of the last of

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S. C. HISTORICAL SOCIETY
PERMISSION IS REQUIRED ATION
OR PUBLICATION
ON PUBLICATION

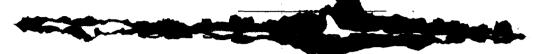
ÆTNA INSURANCE CO., HARTFORD, CONN.



ANNUITY FUND, \$150,000;



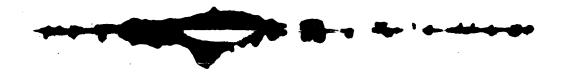
Exclusively held, pledged and appropriated, with its reserved accumulations, by the Charter and regulations of the Company, to the payment of annuities and losses connected with Life Assurance only...and in no event to be liable for the other debts, contracts or engagements of the Company.



This Policy of Insurance Witnesseth, That THE ÆTNA INSURANCE COMPANY,
In consideration of the sum of Annually of Vinalian 52/100 Dollars, to them in hand paid
by Do Insure the Life of the within-named Slave or Slaves, for
the term of
A B Well war for the benefit of Land Challner
amounting to the total sum of English Muniford Dollars, according to the Application of
said All Mr. bearing date the 13 day of ell any
one thousand eight hundred and fifty
And the said Company do Hereby Covenant and Bind Chemselves, well and truly to pay to the said of the Parish or County of Hard Many
State of
insured and set opposite the name or names of the deceased, deducting therefrom all indebtedness on this Policy at that time t Provided, he, she or they die
within the period embraced in this Policy, to wit: From twelve o'clock (at noon) on the
one thousand eight hundred and fifty. Alex until twelve o'clock (at noon) on the
one thousand eight hundred and the
pledged and appropriated.
And it is hereby understood and expressly declared to be the true intent and meaning of this
shall be in any respect untrue or incorrectly stated—or if the said Slave or Slaves, or any of them shall die by his, her or their own hands—or by any injury inflicted in an attempt to commit suicide—or by the hands of justice—or in violation of law—or by the hands of a mob—or by a foreign invasion—or by an insurrection—or by the neglect, abuse, or maltreatment of the owner, or any one to whom he, she or they shall be entrusted—or shall be laboring under any chronic disease at the time of issuing this Policy—or shall be forced, permitted or entreated, by his, her or their owner, or by the agent of the owner, to engage in any combat causing his, her or their death—or shall abscond or be kidnapped—or shall, without the consent of this Company previously obtained and endorsed on or attached to this Policy, be taken or permitted to be taken to more Southern localities (if South of the 35th degree North latitude) than that in which insured, between the fifteenth day of July and the fifteenth day of November, or engage the said Slave or Slaves in any more hazardous occupations than those enumerated and set opposite his, her or their name or names—or in the event of any previous Insurance, (or subsequent, without the consent of this Company previously obtained and endorsed on or attached to this Policy,) on the life or lives of the within-named Slave or Slaves—then, and in all such cases, the said Company shall not be liable for the payment of the sum insured and set opposite the name or names of the said Slave or Slaves deceased, or any part thereof; and this Policy, so far as relates to said payment, shall be utterly void.
And it is further Agreed, That in every case where this Policy shall cease, or become, or be. null or void all previous payments made thereon, shall be forfeited to the said Company. N. B.—This Policy not assignable without the consent of the Company, previously obtained and endorsed on or attached thereto.
In tollness Wij Mf, The Common have, by their Vice President and
STATEMENT: Actuary, signed executed this Contract at the CITY CF HARTFORD, this
Premium, \$1922 on thousand
Extra do. eight hundred and fifty but the same shall not be binding unless coangersigned by Notest Attehu Agent for said Company
Examinations, 2.2.2. countersigned by NATUAL Agent for cold Company Policy, at July 10.
\$ 22:52, E. Bulkeley Vice President.
ONNO M. Suymanz Actuary.
COUNTERSIGNED this 13 h day of ell ar 185 h
ABMAN SMUSTAVE Agent,

REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY.

NO.	NAMES.	AGE.	VALUE.	Amt. Risk.	Rates.	PREM	rom.	+OCCUPATION.			MARKS Residence South, etc.
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\$2.4 DEPARTMENT.

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The Attendation A.C. - Consent to Mar Weng for I this thing The Jet standing March Lever L Floriburg charch 5 7857 For Vadur Ressure I hereby transfer & assign all my right little Hollench to this Palicy of Insurance, as Miliels my hand theal SIB Wallurs Ged



EXAMPLE OF A SLAVE INSURANCE POLICY FOUND IN A PLANTER'S PERSONAL RECORDS

LIFE DEPARTMENT. AGENCY AT NEW ORLEANS.

ÆTNA INSURANCE CO., HARTFORD, CONN.



ANNUITY FUND, \$150,000;



Exclusively held, pledged and appropriated, with its reserved accumulations, by the Charter and regulation of the Company, to the payment of annuities and losses connected with Life Assurance only—and in no event to be liable for the other debts, contracts or engagements of the Company.

TODING WOLLES
This Policy of Insurance Witnesseth, That THE ATNA INSURANCE COMPANY,
In consideration of the sum of
by
the term of One
Tres Princey Rafty for the bearts of have dely
amounting to the total sum of
and many State bearing tale the Stefteast bay of all tales
one thousand eight hundred and fifty. Traced and deposited in the Office of this Company.
And the said Company do hereby Covenant and Bind Chemselves, well and traly to pay & the mid
mus many daly is the Parish or Control Press Orland
State of Leville and within ninety days after due proof of the death of the within-named Stave, Staves, or any of them, the amount-
insured and set opposite the name or names of the deceased, deducting therefrom all indebtedness on this Policy at that time: PROYIDED, he, she or they die
within the period embraced in this Policy, to wite From twelve o'clock (or soon) on the Juf latterfile. day of Co. tollier
one thousand eight buildred and fifty James. Smill treire o'clock (or soon) on the Afficiantsday of Carteries
one thousand eight headred and fifty January for which raid payment, the said Annuty Fund, with its reserved accumulations is solely and exclusively
hindged and appropriated.
And it is hereby understood and expressly declared to be the true jutent and meaning of this:
Policy, and the same is secreted by the Assured, that if the Application subscribed by the said. Mill. Many Muly
shall be in your married an improved as improved as improved as if the said Since of Since or one of them shall die be be be a
inflicted in an attempt to confinit sucredeor by the hands of justiceor is violation of inseror by the bands of a rookor by a foreign invasionor by
in any combat casting his for or their destrict or shall observed on a kildsomethous the district the contest of the contest o
endorsest on or attached to this Policy, he taken or permitted to be taken to more Southern localities (if South of the 33th degree North Intinde) than that in which insured, between the fifteenth day of July and the fifteenth day of November, or engage the said Stare or Slaves in any more hardeness occupations.
Then those enumerated and set (who six ber ut their name or names - or in the event of any newtons Insurance for subservance without the assessed - 4.41
Company previously obtained and endorsed on or attached to this Policy,) on the life or lives of the within-named Slave or Slaves —then; and in all such ones, the said Company shall not be liable for the payment of the sum insured and set opposite the name or names of the said Slave or Slaves deceased, or any part theorety; and this Policy, so far a retakes to said payment, shall be utterly rold be unterly rold.
그 일은 그 사람들은 학생들은 다른 그는 그는 소리를 회원하는 다음을 하지만 사람들이 되었다면 하는 것들이 되는 것을 모든 것을 모든다.
And it is further Agreed, Inst in every case where this Policy shall cease, or become, or be, pull or void, all previous payon in its made thereon, whall be forfaired to the said Company. M. B.— This Policy and assignable seidout the content of the Company, previously obtained and
endorsed on or attacked theyets.
In Witness Whereof, The said ETNA INSURANCE COMPANY have, by their Vice President and

LIFE DEPARTMENT. AGENCY AT NEW ORLEANS.

ÆTNA INSURANCE CO., HARTFORD, CONN.



ANNUITY FUND, \$150,000;



Exclusively held, pledged and appropriated, with its reserved accumulations, by the Charter and regu of the Company, to the payment of annuities and losses connected with Life Assurance only-and

ജമഹരാമ അതരമാരും

This Policy of Insu			INSURANCE COMPAN	Y,
In consideration of the sum of	Hundred Fo	Lex & Localia	Dollars, to them in hand p	mid
by Thomas Munico	hy	O INSURE THE LIFE OF THE	VITHIN-NAMED SLAVE OR SLAVES,	for
the term of Swelves	. months,	in the amount set opposite his	or her name. Loss, if any, payabl	e to
Thomas Mustahy	for the benefit of	ulf		
amounting to the total sum of	to Mine Ob und	and	Pollars, according to the Application	a of
said Thomas Toursa	bearing o	inte the 1000	day of February	
one thousand eight hundred and fifty Beaut	and deposited in the Office of the	is Company.		
And the said Compa	ny do Hereby Covenant		well and truly to pay to the	said
State of Famidiana f	thin ninety days after due proof of th	/ -		ouns
insured and set opposite the name or names of the	lecented, deducting therefrom all in-	Schtedness on this Policy at th	at time: PROVIDED, he, she or they	r die
within the period embraced in this Policy, to wit:	rese twelve e'cleck (at noon) on the	Gent to day	a Tehnary	
one thousand eight hundred and fifty	until twelve e clock (at 2000) on the	Sant S day	or Telman	••••
one thousand eight hundred and fifty	br which said payment, the said Ann	uity Fund, with its reserved a	ecumulations is solely and exclusi	vely ·
pledged and appropriated.	•	•		
And it is hereby und	cretood and expressly de-	clared to be the true	intent and meaning of t	his .
shall be in any respect untrue or incorrectly stated- inflicted in an attempt to commit suicide—or by the an insurrection—or by the neglect, abuse, or maltree chronic disease as the time of issuing this Policy—c in any combat causing his, her or their death—or ei- endorsed on or attached to this Policy, be inken or p which insured, between the fifteenth day of July and than those enumerated and set opposite his, her or it Company previously obtained and enforced on or at cu-es, the said Comonav shall not be liable for the any part thereof; and this Policy, so far as relates to	b hands of justice—or in violation to tument of the sowner, or any one to who shall be forced, permitted or entres hall abscond or be kidnapped—or a bermitted to be taken to more South the fifteenth day of November, or fieir name or names—or in the even tatched to this Policy,] on the life or payment of the sum insured and see	f law—or by the hands of a nom he, she or they shall be ent ated, by his, her or their owner, hall, without the consent of the ren localities (if South of the sengage the said Slave or Slav to f any previous Insurance, (o lives of the within-named Sl opposite the name or names of	nob—or by a foreign invasion—or matted—or shall be laboring under or by the agant of the owner, to eng in Company previously obtained 5th degree North latitude) than tha se in any more hazardoss occupati subsequent, without the consent of vee or 'Slaves —then, and in all s f the said Slave or Slaves deceased.	r by any age and t in ions this uch , or
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REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY.

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LIFE DEPARTMENT. AGENCY AT NEW ORLEANS.

ÆTNA INSURANCE CO., HARTFORD, CONN.



ANNUITY FUND, \$150,000;



Exclusively held, pledged and appropriated, with its reserved accumulations, by the Charter and regulations of the Company, to the payment of annuities and losses connected with Life Assurance only...and in no event to be liable for the other debts, contracts or engagements of the Company.

POLICY. EUVA LE This Policy of Insurance Witnesseth, That THE ÆTNA INSURANCE COMPANY, In consideration of the sum of Cluberts Un Dollars, to them in hand paid . Do Insure the Life of the within-named Slave or Slaves, for months, in the amount set opposite his or her name. Loss, if any, payable to the term of Ought amfor the benefit of partial self IN Tonnadred Dollars, according to the Application of said. Contant 122 tearing date the day of Anne one thousand eight hundred and fifty . A. V. ... and deposited in the Office of this Company. And the said Company do hereby Covenant and Bind Chemselves, well and truly to pay to the said count of the Parish or County of Hoamfrow insured and set opposite the name or names of the deceased, deducting therefrom all indebtedness on this Policy at that time: PROVIDED, he, she or they die within the period embraced in this Policy, to wit: From twelve o clock (at noon) on the fifteenth, day of ... As 12 one thousand eight hundred and fifty Ale until twelve o'clock (at noon) on the afifteenth day of Alfstennber one thousand eight hundred and fifty. Aurent for which said payment, the said Annuity Fund, with its reserved accumulations is solely and exclusively pledged and appropriated. lien 264. And it is hereby understood and expressly declared to be the true intent and meaning of this Policy, and the same is accepted by the Assured, that if the Application subscribed by the said ... To a source to the same is accepted by the Assured, that if the Application subscribed by the said ... To a source to the same is accepted by the Assured, that if the Application subscribed by the said ... To a source to the same is accepted by the Assured, that if the Application subscribed by the said ... To a source to the same is accepted by the Assured, that if the Application subscribed by the said ... To a source to the same is accepted by the Assured, that if the Application subscribed by the said ... To a source to the said ... To And it is further Agreed, That in every case where this Policy shall cease, or become, or be, null or void, all previous payments made thereon, shall be forfeited to the said Company. N. B.—This Policy not assignable without the consent of the Company, previously obtained and endorsed on or attached thereto. In Witness Whereof, The said ÆTNA INSURANCE COMPANY have, by their Vice President and STATEMENT Actuary, signed and executed this Contract at the CITY OF HARTFORD, this \$.1.6.00. wents first day of semi one thousand Premium. eight hundred and fifty Auge but the same shall not be binding unless Extra do. countersigned by C. C. LATHROP, Esq., Agent for said Company at Nam-Onleans, Louisiana. Policy, A. B. 1.1 lkeley Vice President.

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No. of Application No. of Policy A.

SIE AVID POIL ICY.

Actna Insurance Comp'y,

OF HARTFORD CONN.

Benefit of Actna Insurance Comp'y,

OF HARTFORD CONN.

Sum Assured \$600.

Register Book / Page /2/2

Expires Och / S 18/5

Issued / S Policy 264.

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REGISTER OF THE SLAVE OR SLAVES INSURED IN THIS POLICY.

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CLAIM REGISTER

<u>Pg #</u>	No. of	Name of	Issi	ue of Policy	Amt. of	Kind of Policy	<u>D</u>	EAT	<u>H</u>	Pro	ofs of Death	No. Pymts	<u>PO</u>	LICY	Amt. of	When Paid	Amt of	Amt of	
	<u>Policy</u>	Insured	<u>Age</u>	<u>Date</u>	<u>Ins.</u>		<u>Date</u>	<u>Age</u>	Cause	<u>Recd</u>	<u>Apprvd</u>	<u>Made</u>	Good For	Settled For	Cash Pd.		Notes Ded'd	Int. Ded'd	
1	Slave Policy 61	Jack Booth	21	July 18, 1854	1000	Stock 5 yrs ms	June 5, 1859	26	Consumption			5	1000	1000	1000	Sept. 26, 1859	:		F
57	109	Cornelius Eppes	35	Oct. 27, 1856	1000	Slave Policy	Jan. 13, 1860	39	Pneumonia		Jan. 30, 1860	4	1000	1000	980	Mar. 9, 1860	20	20	F
57	86	Daniel Brown		Feb. 4, 1859	1000	Slave Policy	Jan. 7, 1860		Pneumonia			1	1000	1000	1000	Apr. 25, 1860			٨
57	64	William Ash	14	Jun. 30, 1854	500	Slave Policy	Aug. 13, 1860		Typhoid Fever		ī.	4	500	500	500	Oct. 23, 1860			C
57	75	Emma Harnes	31	Oct. 30, 1857	400	Slave Policy	Oct. 5, 1859	33	Dropsy			3	400	400	400	Apr. 3, 1860			k
58	94	Sarah Hubbell	50	Jan. 18, 1860	400	Slave Policy	May 18, 1860	50	Pneumonia			1	400	400	400	May 20, 1861			P

SEP 28 2011 AMERICAN HOME ASSURANCE COMPANY 175 WATER STREET, 18TH FLOOR Maryland Insurance Administration NEW YORK, NY 10038

September 27, 2011

BY OVERNIGHT MAIL

The Honorable Therese M. Goldsmith Insurance Commissioner Maryland Insurance Administration 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

RE: Slavery Era Insurance Registry

Dear Commissioner Goldsmith:

This report is being prepared in response to the Maryland Insurance Administration's regulation entitled, "Registry and Report on Slavery Era Insurance" (COMAR 31.16.09). Please find enclosed the consolidated report for the insurers within the American International Group, Inc. (AIG) holding company, in compliance with the above referenced code section.

Reporting Insurer

American Home Assurance Company

NAIC # 19380

175 Water Street, 18th Floor

New York, NY 10038

Phone:

(212) 770-7000

Fax:

(646) 792-5942

E-mail:

pauls.brown@aig.com

Website:

www.aig.com

Contact Person

Paul S. Brown Associate General Counsel State Relations & Global Regulatory Group American International Group, Inc. 80 Pine Street, 13th Floor

New York, NY 10005

Phone: (212) 770-5963

Fax: (646) 792-5942

E-mail: pauls.brown@aig.com

Holding Company Identification

American International Group, Inc. (AIG) NAIC # 012

180 Maiden Lane

New York, NY 10038 Phone: (212) 770-7000 Fax: (646) 792-5942

Fax: (646) 792-5942 E-mail: AnswerCenter@aig.com

Website: www.aig.com

AIG Insurers Authorized in the State of Maryland

Company Name	NAIC Company Code
American General Assurance Company	68373
American General Indemnity Company	24376
American General Life and Accident Insurance Company	66672
American General Life Insurance Company	60488
American General Life Insurance Company of Delaware	66842
American General Property Insurance Company	31208
AIU Insurance Company	19399
American Home Assurance Company	19380
Chartis Casualty Company	40258
Chartis Property Casualty Company	19402
Commerce and Industry Insurance Company	19410
Granite State Insurance Company	23809
Illinois National Insurance Co.	23817
National Union Fire Insurance Company of Pittsburgh, Pa.	19445
New Hampshire Insurance Company	23841
SunAmerica Annuity and Life Assurance Company	60941
SunAmerica Life Insurance Company	69256
The Insurance Company of the State of Pennsylvania	19429
United Guaranty Commercial Insurance Company of North Caroli	na 16659
United Guaranty Mortgage Indemnity Company	26999
United Guaranty Residential Insurance Company	15873
United Guaranty Residential Insurance Company of North Carolin	ia 16667
The United State Life Insurance Company in the City of New Yor	k 70106
The Variable Annuity Life Insurance Company	70238
Western National Life Insurance Company	70432

History

AIG did not exist during the "Slave Era", 1743-1865, reporting period (the "Reporting Period"). AIG was incorporated as a holding company in 1968. Prior to 2001, AIG came to own six insurance companies that operated during the Reporting Period. As a result of the mergers and consolidations outlined below, only two of the six companies remain in existence today.

- 1. The Insurance Company of the State of Pennsylvania (ISOP) (Organized in 1794, in Philadelphia, PA.)
- 2. Union Mutual Insurance Company (Union)
 (Organized in 1804, in Philadelphia, PA. Union Mutual Insurance Company merged into The Insurance Company of the State of Pennsylvania in 1911.)
- 3. American Fire Insurance Company (American Fire)
 (Organized in 1810, in Philadelphia, PA. American Fire Insurance Company merged into The Insurance Company of the State of Pennsylvania in 1913.)
- 4. Spring Garden Insurance Company (Spring Garden)
 (Organized in 1835, in Philadelphia, PA. Spring Garden Insurance Company merged into The Insurance Company of the State of Pennsylvania in 1911.)
- 5. Rutgers Fire Insurance Company (Rutgers)
 (Organized in 1853, in New York, NY. Rutgers Fire Insurance Company consolidated with Globe Fire Insurance Company as the Globe and Rutgers Fire Insurance Company in 1899. Globe and Rutgers Fire Insurance Company merged into American Home Assurance Company in 1954.)
- 6. Globe Fire Insurance Company (Globe Fire)
 (Organized in 1863, in New York, NY. Globe Fire Insurance Company consolidated with Rutgers Fire Insurance Company in 1899 as the Globe and Rutgers Insurance Company. Globe and Rutgers Fire Insurance Company merged into American Home Assurance Company in 1954.)

Four of these companies, ISOP, Union, American Fire and Spring Garden, had their headquarters in Philadelphia, Pennsylvania. In the late 1700s and early 1800s, Philadelphia played an important role in the Abolitionist movement. In 1780, Pennsylvania became the first state to abolish slavery. The Pennsylvania Society for Promoting the Abolition of Slavery and for the Relief of Free Negroes Unlawfully Held in Bondage formally organized in 1784. Commonly known as the Pennsylvania Abolition Society, its roots trace back to meetings held as early as 1775. In 1787, Philadelphia's first black mutual aid association, the Free African Society, was formed with the mission to care for poor widows and fatherless children. The city also became a significant stop on the Underground Railroad. In 1833, the American Anti-Slavery Society was founded in Philadelphia, with a mission to end slavery in the United States.

Spring Garden and American Fire were authorized to write only fire insurance. The files of Spring Garden for the Reporting Period reference policies and losses only in and around Philadelphia. While Union and ISOP were authorized to write fire, marine, and life, Union appears to have written primarily, if not exclusively, fire insurance, and ISOP wrote exclusively marine until 1844, when it began to issue perpetual policies.

Methodology

In late 2000, California enacted a law that required insurers to file, in early 2001, any information they had pertaining to California's newly created "Slavery Era Insurance Registry." At that time, AIG began a careful, thorough and professional search of its records and other available sources to determine whether any of its insurers, or their predecessor corporations, ever wrote slaveholder insurance policies. All of AIG's and its subsidiaries' records were examined by an independent Certified Archivist under the direct supervision of the Corporate Archivist, also a Certified Archivist. This research involved the full-time activity of one archivist for six weeks and the part-time engagement of one archivist over several months, with departmental back up and supervision.

The inactive files of AIG have been located in East Brunswick, New Jersey since 1980, under the management of Iron Mountain, Inc. Using keywords and phrases and the Reporting Period, some 65 bankers' boxes were pulled and examined by an archivist. Additional documentation was obtained from AIG's Archives Department, which was located on the 10th floor of 72 Wall Street, New York, NY 10005 and from the AIG Archives in storage at the Records Center operated by Diversified Information Technology, Inc. at 123 Wyoming Avenue in Scranton, Pennsylvania 18503.

We searched the AIG Archives' databases for catalogued records from the "Slave Era" using dates and keywords. All results were reviewed and the relevant records were located and researched. The Diversified Information Technology, Inc.'s database of uncatalogued records from the "Slave Era" were also searched by reviewing record descriptions and dates. Again, all relevant records were located and researched.

In addition, we paid to employ the resources of the Mariners' Museum Research Library and Archives in Newport News, Virginia, to check the ship manifest of marine voyages that our records disclosed one of our companies had insured. This search, using non-AIG records, indicates the diligence with which AIG undertook to identify slave coverage, if any.

The archival research involved examination of corporate minutes; fire, marine and perpetual insurance policies where available; printed publications; legal agreements and even a scrapbook. Particular examination was made when reference was made to losses occurring at points below the Mason-Dixon Line. We even examined a biography of Stephen Girard, a founder of The Insurance Company of the State of Pennsylvania (ISOP), to discover that Girard, the merchant, ship owner and philanthropist did not carry slaves on his ships.

Nothing in the records of AIG and its subsidiary companies, to that point, contained so much as a reference to insurance policies that covered slaves or slaveholders.

In August of 2001, upon the closing of the AIG purchase of the American General Corporation, a second search of records was undertaken by a professional staff of certified archivists to search the records of the newly acquired American General Corporation (AGC) and its subsidiaries.

Of the AGC insurers acquired by AIG, only The United States Life Insurance Company in the City of New York (USLife), incorporated on January 26, 1850, had a possible exposure to the "Slave Era." All other AGC companies were incorporated after the Civil War.

The AIG Corporate Archivist, a certified archivist, researched records and interviewed staff at the Park Avenue, New York City office of AGC, which includes the current home office of USLife. The AIG Corporate Archivist traveled from New York to Houston, Texas, interviewing staff and examining records in boxes on shelves and filing cabinets at the AGC headquarters. Some boxed materials were sent from Houston to the New York headquarters of AIG for further examination. The search included examination of all relevant microfilmed/ fiched records as well as paper records.

AIG archivists interviewed AGC records administrators in Houston, Dallas, New York City and Neptune, New Jersey. The AIG Corporate Archivist personally reviewed the USLife records inventory submitted by Iron Mountain, Inc. This included using keywords and phrases and the relevant "slavery era" time period to identify boxes of possible relevance for review.

Five certified archivists looked inside and inventoried 374 bankers' boxes in a warehouse at Guarantee Records Management in Jersey City, New Jersey, containing records sent from USLife's prior home office on Maiden Lane in New York City. These materials were sent to New Jersey when USLife closed its lower Manhattan headquarters. These 374 boxes contained USLife materials not previously indexed but that were reviewed and inventoried in November 2001.

Other than a single policy reprinted in a magazine from 1935, there were no policies found, no copies of policies found, nor microfilm or microfiche evidence of policies of USLife for the Reporting Period. See <u>The American Conservationist</u>, <u>A Magazine of Information and Inspiration for Life Insurance Men</u>, June 1935, pages 13 – 17.

Persons interviewed at USLife and AGC included individuals from corporate law litigation, corporate secretary's department, business managers and actuaries.

The only relevant materials uncovered at the time were two USLife bound registries:

- 1. Policies Issued 1850 1872; and
- 2. Claims Paid 1850 1872.

All insurance policies in the Policies Issued Registry were issued in straight numerical order regardless of type, jurisdiction or agency. The information on each policy includes the buyer, who was covered, the state in which it was issued, date and notes on whether or not it was

cancelled, continued or forfeited. Claims in the Claims Registry were paid in numerical order with the policy number listed, beneficiary and date paid.

Two certified archivists used the two registers to create lists of slaveholder policies issued and of claims paid under these policies. All information from the registers regarding slaveholders' policies was used to create the lists. The registries apparently used a coding of "SL" to indicate a policy issued to a slaveholder.

- 1. A majority of what appears to be the insured slaves indicated on the Policies Issued Register of USLife 1850 1872 include only a first name. A list was created providing the requested information, in many instances using only a first name because only a first name was found in the Policy Issued Registry.
- 2. A list of policyholders thought to be slaveholders because of an "SL" indication in the registry was also created.
- 3. Other than a magazine article containing one policy, no policies of US Life for the Reporting Period were found and no documents regarding these policies were found other than the registries. A listing from the Registry of Policies Issued 1850 1872 for USLife was created in the order in which those policies were issued.
- 4. Finally, a list of claims settled between 1850 1872 was created, which shows the claims paid on policies with their respective numbers, which were followed by the letters "SL" apparently indicating a slaveholder policy.

That is the extent of AIG's records regarding "slavery era" insurance policies.

Upon our review of the aforementioned data, pursuant to COMAR 31.16.09, we have concluded that since all of the policies listed on the Policy Issued Registry were written or issued in the state of Alabama, commonwealths of Kentucky and Virginia, and the District of Columbia, and there is no evidence of any polices written or issued in the State of Maryland, AIG has no data in its possession responsive to this data call.

Since our initial investigation into slavery era insurance policies began in 2000, the ongoing efforts of our corporate archivists have not resulted in the discovery of any additional information beyond that which was reported to the State of California in 2001 (which is as shown above). A recent conversation and email exchange with our Corporate Archivist has confirmed that no new documents, or material of any kind, relating to the slavery era have been discovered in their ongoing review of any and all records associated with AIG or any of its subsidiary companies. Should the ongoing and continual efforts to review archived material turn up any relevant information in the future pertaining to any of AIG's companies, we will notify the MIA, immediately.

Sincerely,

Adam C. Reed

Assistant Vice President

American Home Assurance Company

State of New York }
County of New York }

Adam C. Reed, first being duly sworn, deposes and says that he is an Assistant Vice President of American Home Assurance Company, the person responsible for preparing and filing the attached paper(s); that he has read the same and, to the best of his knowledge, information, and belief, knows the contents thereof to be true and not misleading; and, to the best of his knowledge, information, and belief, knows that the contents are the most accurate information available at the time of the submission of this report.

Adam C. Reed

Subscribed and sworn to before me this 27th day of September 2011.

Vincent & Patalano

alar Neut

Notary Public in and for said County of New York

and State of New York

My commission expires 10/15/2013

Minery Public, State of New York
No. 31-4967423
Qualified in New York County 2013
Commission Expires October 15, 2013



Rosa G. Iturbides Vice President - Law Department Tel: (212) 314-3893 Fax: (212) 707-7973

LAW DEPARTMENT

E-mail: rosa.iturbides@axa-equitable.com

September 30, 2011

VIA FEDERAL EXPRESS

Ms. Brenda Wilson, Associate Commissioner, Life and Health Maryland Insurance Administration 200 Saint Paul Place, Suite 2700 Baltimore, MD 21202

Re: Slavery Era Insurance Registry Report

<u>AXA Corporate Solutions Life Reinsurance Company - NAIC No. 68365</u>

Dear Ms. Wilson:

Pursuant to Title 30 - Registry and Report on Slavery Era of Maryland Insurance Code, U. S. Financial Life Insurance Company took the actions required by Sections 30-101 <u>et seq.</u> and is hereby filing the Slavery Era Insurance Policies Registry Report.

1. Insurer Identification - Reporting Insurer

Company Name: AXA Corporate Solutions Life Reinsurance Company

Address: 1290 Avenue of the Americas, New York, NY 10104

Telephone: 212-314-3893

Fax: 212-707-7973

E-Mail: rosa.iturbides@axa-equitable.com

NAIC Code 68365

Website: www.axa-corporatesolutions.com

2. Contact Person

Name: Rosa G. Iturbides

Address: AXA Corporate Solutions Life Reinsurance Company

1290 Avenue of the Americas, 12th Floor, New York, NY 10104

Telephone: 212-314-3893

Fax: 212-707-7973

E-Mail: rosa.iturbides@axa-equitable.com

AXA Corporate Solutions Life Reinsurance Company was incorporated in 1983 as a reinsurer, therefore, it could not have issued any policy in the slavery era.

If you have any questions concerning this report, please contact me.

Very truly yours.
Rase Ifubile



Rosa G. Iturbides
Vice President - Law Department
Tel: (212) 314-3893
Fax: (212) 707-7973
E-mail: rosa.iturbides@axa-equitable.com

LAW DEPARTMENT

September 30, 2011

VIA FEDERAL EXPRESS MAIL

Ms. Brenda Wilson, Associate Commissioner, Life and Health Maryland Insurance Administration 200 Saint Paul Place, Suite 2700 Baltimore, MD 21202

Re: Slavery Era Insurance Registry Report

AXA Equitable Life Insurance Company – NAIC No. 62944

Dear Ms. Wilson:

Pursuant to Title 30 - Registry and Report on Slavery Era of Maryland Insurance Code, AXA Equitable Life Insurance Company ("AXA Equitable" or "the Company") took the actions required by Sections 30-101 <u>et seq.</u> and is hereby filing the attached Slavery Era Insurance Policies Registry Report ("the Report").

As detailed in the Report, AXA Equitable has conducted an extensive and diligent search of its books and records with respect to the issues identified by the Department.

The enclosed Report contains confidential and proprietary information and trade secrets, which if disclosed, would cause injury to AXA Equitable's competitive position. Accordingly, we submit the Report to the Department with the express understanding that such information will be afforded confidential treatment pursuant to all applicable privacy and freedom of information laws. If the exemption is not granted, or in the event that any third party requests access to the Report, in whole or in part, we request that Equitable be advised promptly by the Department of such request, and that the Department notify the Company prior to the release of any information contained in the Report.

If you have any questions regarding the Report, please contact me at (212) 314-3893.

Very truly yours,
Pare Johns

REPORT OF FINDINGS

BY

AXA EQUITABLE LIFE INSURANCE COMPANY FORMERLY KNOWN AS THE AXA EQUITABLE LIFE ASSURANCE SOCIETY OF THE UNITED STATES

TO

THE MARYLAND DEPARTMENT OF INSURANCE IN RESPONSE TO THE REQUEST FOR INFORMATION ISSUED IN CONNECTION WITH THE SLAVERY ERA INSURANCE POLICIES REGISTRY

Preliminary Statement

Pursuant to Title 30 – Registry and Report on Slavery Era of the Maryland Insurance Code, AXA Equitable Life Insurance Company ("AXA Equitable" or the "Company") took the actions required by Sections 30-101 et seq. of the Maryland Insurance Code in response to the request for information issued in connection with the Slavery Era Insurance Policies Registry (the "Request"). This Report discusses AXA Equitable's findings.

1. Insurer Identification - Reporting Insurer

Company Name: AXA Equitable Life Insurance Company

Address: 1290 Avenue of the Americas, New York, NY 10104

Telephone: 212-314-3893

Fax: 212-707-7973

E-Mail: rosa.iturbides@axa-equitable.com

NAIC Code: 62944

Website: www.axa-equitable.com

2. Contact Person

Name: Rosa G. Iturbides

Address: AXA Equitable Life Insurance Company

1290 Avenue of the Americas, 12th Floor, New York, NY 10104

Telephone: 212-314-3893

Fax: 212-707-7973

E-Mail: rosa.iturbides@axa-equitable.com

3. Research Methodology

The Request required AXA Equitable to report to the Department regarding slaveholder insurance policies that the Company wrote either directly or through a predecessor corporation

during the slavery era. On the basis of our review of AXA Equitable's records, as described below, no evidence was found indicating that the Company wrote any slaveholder insurance policies.

To prepare this Report, we conducted a diligent search of Company locations in New York City and in Charlotte, NC to locate documents that we believed were reasonably likely to contain relevant information. We also made inquiry of key employees who might reasonably be expected to provide relevant information. We were able to locate and review records relating to the following categories:

- Death Claims Booklets and Ledgers Books of Original Entry;
- Historical Collection of Records;
- □ Insurance Affairs Files:
- Minutes to the Meetings of the Board of Directors and other Board Committees; and
- Microfilmed Policy Data for Terminated Policies.

We note, of course, that while AXA Equitable possesses some records dating back to its founding in 1859, normal record retention practices and other factors (including a catastrophic fire at the Company's headquarters in 1912) necessarily have left the Company with incomplete records for the period prior to the late 20th century, other than policy files for in-force policies. As a result, in reaching conclusions contained in this Report, AXA Equitable has had to review and interpret records and other information that were often quite old, incomplete, and/or inconclusive. Therefore, the findings set forth below should be understood to reflect the Company's best efforts to respond to the Department based on the current information available to it.

A. Death Claims Booklets and Ledgers - Books of Original Entry

379103 Page 2 of 7

These records identify claims paid to beneficiaries under AXA Equitable policies between 1860 and 1892. Based on our review of these records, there was no indication that AXA Equitable wrote slaveholder insurance policies, as these records do not contain any notation regarding the race of the beneficiaries, the policy owners or insureds.

B. Historical Collection of Records

These records included various letters and pamphlets that listed death claims from 1860 to 1909. Based on our review of these records, there was no indication that AXA Equitable wrote slaveholder insurance policies.

We also reviewed a multi-volume history of AXA Equitable, entitled <u>The Equitable Life</u>

<u>Assurance Society of the United States 1859 -1964</u>, as well as a more recent single-volume history of the Company, entitled <u>The Life and Times of the Equitable</u>. There was no indication in these histories that AXA Equitable wrote slaveholder insurance policies either directly or through a predecessor corporation during the slavery era.

C. <u>Insurance Affairs Files</u>

Based on our review of these records, AXA Equitable purchased three Southern insurance companies after the end of the Civil War: (i) Baltimore Life Insurance Company (1867); (ii) The Life Association of the South of Montgomery, Alabama (1870); and (iii) Virginia Insurance Company of Staunton, Virginia (1871). Policies assumed from The Life Association of the South and Virginia Insurance Company were written after the end of the Civil War. Policies assumed from Baltimore Life Insurance Company were written between 1838 to 1871. These policy records did not contain any notation regarding the race of the policyholders or beneficiaries, and the beneficiaries of these policies were identified as "wife," "children," and/or "creditors."

D. Minutes to the Meetings of the Board of Directors and other Board Committees

379103 Page 3 of 7

Based on our review of minutes of meetings of the Board of Directors and minutes of the Executive, Agency, Insurance, and Rules and Regulations Committees of the Board of Directors from 1859 through May 2001, no evidence was found which indicated that AXA Equitable wrote slaveholder insurance policies directly or through a predecessor corporation during the slavery era.

AXA Equitable began doing business in the Confederate states and "border states" as follows:

Alabama - June 1865 Arkansas - July 1866 Delaware - June 1862 Florida - 1865 or 1866 Georgia - December 1860 Kansas - January 1861 Kentucky - March 1860 or January 1869 Louisiana - March 1879 Maryland - August 1860 Missouri - November 1869 Mississippi - September 1860 North Carolina - November 1865 Oklahoma Territory - October 1868 South Carolina - November 1859 Tennessee - July 1866 Texas - probably 1876 Virginia - July 1866 West Virginia - 1864

E. Microfilmed Policy Data for Terminated Policies

1) In connection with its review, AXA Equitable identified 2,120 cartridges of microfilm that contain summary contract information for policies terminated prior to 1972, when AXA Equitable initiated its first computerized policyholder record-keeping system referred to as the Computer Assisted Policy Service System ("CAPS"). The content of the microfilm includes:

□ Terminated History Cards – information regarding policies that were terminated prior to 1972;

379103 Page 4 of 7

concerning the policy that was issued: life assured □ residence occupation date of birth place of birth □ age policy number original agency and collecting agency □ type of policy issued □ class of policy issued insurance amount, currency, installment amount, bond amount the date, number, amount, and repayment date of any loans □ office date of issue mode, amount, and change date of premium payments □ form of termination

beneficiaries, assignments, clauses, and agreements

2) The Terminated History Cards provide the following summary information

3) A thorough review of the microfilm cartridges containing Terminated History Cards was conducted to identify those policies that AXA Equitable wrote either directly or through a predecessor corporation during the slavery era. 364 microfilm cartridges were identified as containing information relating to policies issued prior to 1932. Of those 364 microfilm cartridges, only one contained information relating to policies written during the slavery era. Based on our review of the information contained on the microfilm cartridges, no evidence was found which indicated that AXA Equitable wrote slaveholder insurance policies directly or through a predecessor corporation during the slavery era.

Information available at the time a policy was issued was typewritten onto the thencurrent Terminated History Cards. As activity occurred on the policy, additional information was handwritten onto the Terminated History Cards.

4. Names of Slaves

379103 Page 5 of 7

Based on our review, no evidence was found which indicated that AXA Equitable wrote slaveholder insurance policies directly or through a predecessor corporation during the slavery era.

5. Names of Slaveholders

Based on our review, no evidence was found which indicated that AXA Equitable wrote slaveholder insurance policies directly or through a predecessor corporation during the slavery era.

6. Policy Information

Based on our review, no evidence was found which indicated that AXA Equitable wrote slaveholder insurance policies directly or through a predecessor corporation during the slavery era.

379103 Page 6 of 7

VERIFICATION

STATE OF	New York)	
COUNTY OF	New York)	

Rosa G. Iturbides, first being duly sworn, deposes and says that she is Vice President of AXA Equitable Life Insurance Company, the person preparing and filing the attached Report; that he has read the same and knows the contents thereof, and based on his information and belief the content are true and correct.

ROSA G. ITURBIDES VICE PRESIDENT

Subscribed and sworn to Before me this 30th day of September, 2011

Notary Public in and for said County and State

My commission expires:____



410-727-1794 PHONE 800-272-1794 TOLL FREE 410-539-1073 FAX

Baltimore Equitable Insurance

August 25,2011

www.1794insurance.com

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place Suite 2700 Baltimore, MD 21202 AUG 26 2011
Maryland Insurance
Administration

Re:

COMAR 31.16.09

Registry and Report on Slavery Era Insurance Regulations

This report contains the required information for:

Baltimore Equitable Society for Insuring Homes for Loss By Fire

100 N. Charles Street Suite 640

Baltimore, MD 21201

410-727-1794 (phone)

410-539-1073 (fax)

swoodward@1794insurance.com

NAIC #16039

www.1794insurance.com

The contact person for all information contained in or referred to in this report is:

Sharon V. Woodward CEO/President Baltimore Equitable Society 100 N. Charles Street Suite 640 Baltimore, MD 21201 410-727-1794 (phone) 410-539-1073 (fax) swoodward@1794insurance.com

All of the records that describe the properties insured by Baltimore Equitable from its inception in 1794 through the Civil War reside at the Maryland Historical Society. All research was conducted on their premises.

Baltimore Equitable contracted with an individual to review a representative random sample of policies generated using an excel program supplied to us by our audit firm (Johnson Lambert Company). There were approximately 37,000 policies written in the subject time frame. They

suggested that we run a sample of 60 policies to review. We actually ran two 60-policy samples and reviewed all 120 randomly chosen policies. There were no instances found of insurance issued that covered slaves of any kind, the property of slaves, or the lives of slaves.

Once the random sample was complete, we directed our researcher to review each policy ledger book that contained records of policies issued during the subject time frame. The vast majority of our policies were written only on real property – homes, sheds, outbuildings, stables, kitchens, etc. – but we did find some policies that insured specific personal property. This personal is specifically listed in the policy ledger books. Where a policy extended to cover personal property, the researcher was directed to copy the specific items that were covered.

All data was recorded in an Excel file and revealed no instances where Baltimore Equitable Society insured slaves, their property, or their lives. We have retained this data, and it is available, if required.

I hereby certify and affirm that the information contained within this report is true and not misleading and contains the most accurate information available at the time of submission of this report.

Sharon V. Woodward, CEO/President

Baltimore Equitable Insurance

(Jugust 25, 2011



333 S. Wabash Ave. Chicago IL 60604

SEP 2 6 2011

Maryland Insurance
Administration

Stathy Darcy
Senior Vice President and
Deputy General Counsel
Phone: 312-822-3742
email: stathy.darcy@cna.com

September 21, 2011

Commissioner Therese M. Goldsmith Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

This correspondence will serve as responsive reporting to required information submission pursuant to COMAR 31.16.09.04 by the following insurer:

Continental Casualty Company 333 South Wabash Avenue Chicago, IL 60604 312-822-5000 NAIC # 218- 20443 www.cna.com

Continental Casualty Company is submitting this report pursuant to COMAR 31.16.09.02 through COMAR 31.16.09.05 on behalf of the CNA insurance companies, NAIC Group Code 218, that are licensed to transact the business of insurance in the State of Maryland. A list of the companies included in this response are attached as Exhibit 1 and incorporated herein by reference.

Please note that with respect to the data required to be reported pursuant to COMAR 31.16.09.04, the named insurers hereby submit that there exists no data to report.

Based on the requirements set forth in COMAR 31.16.09.04, we researched the corporate records of the insurance companies within the holding company system of the CNA Financial Corporation ("CNA" or the "Company") to determine if any of the companies, regardless of their status as a licensed insurer in Maryland, were in existence prior to 1865.

A review of the corporate records of the insurance companies within CNA revealed as of this date, there is one current CNA-affiliated entity that was in existence prior to 1865: The Continental Insurance Company which was incorporated in the state of New York on November 12, 1852 ("CIC"). However, there are other CNA-affiliated entities that, although no longer existing, did operate prior to 1865.

Niagara Fire Insurance Company was incorporated in the state of New York on July 31, 1850 and was merged into CIC effective December 31, 2006. Firemen's Insurance Company of Newark, New Jersey was incorporated in the state of New Jersey on December 3, 1855 and was also merged into CIC effective December 31, 2006. The Phenix Insurance Company, incorporated in New York in 1853, was acquired by CIC in 1906 and merged with the Fidelity Insurance Company. The Fidelity-Phenix Insurance Company merged with CIC in 1959.

Once it was determined that there were CNA-affiliated entities actively writing insurance

prior to 1865, CNA reviewed the corporate charter for the only remaining entity (The Continental Insurance Company), and the corporate charters for the now extinct entities of Firemen's Insurance Company of Newark, New Jersey and Niagara Fire Insurance Company to determine whether or not the companies may have issued property policies that may have covered the property of slave owners. The Continental Insurance Company's charter states that its purpose was to "make contracts of insurance with any person or persons, or body politic or corporate on dwellings, houses, stores, and all kinds of buildings, and upon household furniture, merchandise, ships and other vessels, and their cargoes in port, and other property against loss or damage by fire, and the risks of inland navigation and transportation." The corporate charter for Firemen's Insurance Company of Newark, New Jersey stated that the Company was empowered to "insure houses or buildings of any description, and also personal property of whatsoever kind against loss or damage by fire." The original articles of incorporation for Niagara Fire Insurance Company were amended and replaced in 1926; therefore, it was not possible to determine what the original purpose of incorporation was for Niagara Fire Insurance Company. We were unable to locate a corporate charter for the Phenix Insurance Company.

Given that these corporate charters limited their property coverage to loss by fire, it would appear unlikely that any of these companies issued policies that covered the loss of slaves. However, without reviewing policies dating back to that time, it is not possible to state with absolute certainty that slaves were not covered property under any policy issued by any of the three CNA companies in existence prior to 1865. Thus, CNA attempted to locate any policy records that pre-dated 1865. The CNA enterprise complies with a single Records Management Policy having Master Functional Retention Schedules. The longest established retention period in effect for the losses and policies in question is 10 years. CNA does not have record of any property and casualty policies issued prior to 1865.

Finally, CNA employees reviewed records contained in the Archive department to determine if there were any records of policies in existence from the period preceding 1865. With the exception of a few policies retained for posterity, there are no policy records dating back before 1865. The few policies examined were issued by The Continental Insurance Company in 1853 and covered personal dwellings and content therein. There was no language contained in any of these policies to indicate that slaves were covered property. In addition, there was no listing of any property other than the dwelling, furniture and clothing within the dwelling.

CNA is confident that it has done a thorough review of the information available and has no records to report to the Maryland Insurance Administration concerning policies issued to slaveholders prior to 1865.

I certify and affirm under oath that the information provided is true and not misleading; and that the report contains the most accurate information available at the time of the submission of the report.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Stathy Darcy

Senior Vice President and Deputy General Counsel

CNA Financial Corporation

EXHIBIT 1

List of CNA Companies on whose behalf Continental Casualty Company is reporting:

COMPANY	NAIC CODE
American Casualty Company of Reading, Pennsylvania	20427
Columbia Casualty Company	31127
Continental Assurance Company	62413
Continental Casualty Company	20443
The Continental Insurance Company	35289
National Fire Insurance Company of Hartford	20478
Transportation Insurance Company	20494
Universal Surety of America	13200
Valley Forge Insurance Company	20508
Western Surety Company	13188



THE CUMBERLAND INSURANCE GROUP

DAVID F. RACZENBEK, ESQ. Legal Department

SEP 2 8 2011
Maryland Insurance
Administration

September 27, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202 Via Federal Express

Attention: Honorable Therese M. Goldsmith, Maryland Insurance Commissioner

Re: Cumberland Insurance Group Consisting of Cumberland Mutual Fire Insurance Company NAIC # 13684 and Cumberland Insurance Company, Inc. NAIC # 10448

Dear Commissioner Goldsmith:

Please be advised the below is the Slavery Era Report being filed on behalf of Cumberland Insurance Group consisting of our two companies Cumberland Mutual Fire Insurance Company and Cumberland Insurance Company, Inc. whose NAIC numbers are set forth above. I am providing an original plus one copy as per regulations. Please note that our primary address is 633 Shiloh Pike, Bridgeton, New Jersey 08302 and a facsimile number whereby you may transmit facsimile communication is (856) 451-2527. Our main telephone number is (856) 451-4050. My e-mail address is drawww.cumberlandgroup.com. Please note that my position for both companies is chief legal officer and secretary to the boards. Please be advised that you may reach me via the main telephone number at extension 1209 or facsimile number noted above.

I am providing to you this information as required under Maryland Insurance Code Section 30-101, et.seq and regulations promulgated consistent with the same found at COMAR 31.16.09.01, et. seq. Our company Cumberland Mutual Fire Insurance Company was founded in 1844 in Cumberland County, New Jersey and Cumberland Insurance Company Inc. was founded in 1982. We have also acquired by merger the former Mutual Fire Insurance Company in Calvert County, which was located in Maryland and which had been founded in 1858 as well as Chester Mutual Insurance Company which was located in Pennsylvania and which had been founded in 1840.

As Cumberland Insurance Company, Inc., was not founded until 1982 there is no situation wherein any slaveholder policies were ever issued. To ascertain that no slaveholder

policies were issued by Cumberland Mutual Fire Insurance Company, I have caused a review of documents existing in our office from the original incorporation in 1844 through 1865 to be reviewed as required by the statutes and regulations. Said documents contain references to property insured and there is no indication of the issuance of any slaveholder insurance policies as defined by statute by said company.

I have also caused research to be conducted as to historical records searchable through the internet or available through the Cumberland County Historical Society and/or the Salem County Historical Society (the two New Jersey counties where Cumberland Mutual Fire Insurance Company was most active during the relevant time period) and there is no evidence of the existence of slaveholder insurance policies issued by Cumberland Mutual Fire Insurance Company. Historical records that were reviewed showed that although slavery existed in the areas noted above, no reference could be found to issuance of slaveholder insurance policies.

As to Mutual Fire Insurance Company in Calvert County, records indicate that the first policy was not issued until 1866 and Cumberland Mutual Fire Insurance Company as successor by merger maintains a copy of said policy. Although Calvert was incorporated in 1858, given the timing of the Civil War, it appears that no policies were issued until after the conclusion of the Civil War. Hence, as no business was written during the slavery era as defined in Maryland Insurance Code 30-102, there is no indication of the issuance of slaveholder insurance policies by said former company.

As to Chester County Mutual Insurance Company which was founded in 1840 in Pennsylvania, a review of historical documents in the possession of Cumberland Mutual Fire Insurance Company as successor by merger, fail to indicate any slaveholder insurance policies being issued. Further, given the historical facts of Pennsylvania being a state strongly opposed to slavery and which state had a strong Quaker population which vocally opposed slavery and supported actions to terminate slavery, there is no evidence to indicate that slaveholder insurance policies would have been permitted or tolerated in the area where said entity existed. Hence, there is no evidence to indicate that slaveholder insurance policies were ever issued by Chester County Mutual Insurance Company.

As no evidence exists of the issuance of slaveholder insurance policies by any present company or predecessor companies of our Group, no electronic data is being filed with the Maryland Insurance Administration as per Bulletin 11-15.

Thanking you for your kind attention to this matter, I am

David F. Raczenbek, Esq.

The Cumberland Insurance Group

I hereby certify that the foregoing information is true and not misleading to the best of my knowledge and contains the most accurate information available at the time of the submission of this report. I understand that if any of the foregoing statements are willfully false, I am subject to punishment. I further certify that I am making these statements as the Secretary of Cumberland Mutual Fire Insurance Company and Cumberland Insurance Company, Inc., and am authorized to do so.

Ву:

David F. Raczenbek, Esq.

Sworn to and subscribed

before me this 27

_, 2011

Some Di Di

Notary Public

PAMELA D. BISHOP
Notary Public, State of New Jersey
My Commission Expires
September 18, 2013



September 6, 2011

SEP 07 2011
Maryland Insurance
Administration

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place Suite 2700 Baltimore, MD 21202

Re:

Maryland Insurance Administration Bulletin 11-15 – Registry and Report on Slavery Era

Insurance Regulations

Dear Sir or Madame:

Pursuant to the above regulation, please see the following report on Slavery Era Insurance Regulations:

- 1. Insurer Name and information:
 - a) Frederick Mutual Insurance Company (FMIC)
 - b) 57 Thomas Johnson Drive, Frederick, Maryland 21702
 - c) 301-663-9522
 - d) 240-629-9206
 - e) K.filler@fredmut.com
 - f) NAIC: 14753, www.fredmut.com
- 2. Contact Information:
 - g) Contact: Kevin R. Filler, President and CEO
 - h) 57 Thomas Johnson Drive, Frederick, MD 21702
 - i) 240-405-1823
 - j) 240-629-9206
 - k) k.filler@fredmut.com
- 3. Research Methodology:

Frederick Mutual Insurance Company (FMIC) began operations in 1844. We have records and files that date back to the designated time period. These records include maps, financial documents and policy ledgers. The policy ledgers were determined to be the appropriate records to be researched and provide the information that is being required.

FMIC hired, via a local temporary employment firm, a student entering his senior year majoring in history from a local four year college to diligently search the policy ledgers to find any entries related to

57 Thomas Johnson Drive, Frederick. MD 21702-4301 301-663-9522

Personal Lines Fax: Commercial Lines Fax: 301-662-2053 301-663-9026 Claims Fax:

240-405-1895

All Other Dept. Fax:

240-405-1222

slaves that were insured by FMIC. After searching through the records there were no reports or policy entries of Frederick Mutual Insurance Company insuring slaves.

The only entry that was remotely similar was in August 1860 an entry was made to insure a "servant's house" however after careful search of this policy there was no mention of insuring slaves.

Should there be any further questions, please feel free to contact me.

Very truly yours,

Kevin R. Filler

President and CEO

My Comm.

Exps. 5/16/14



Via Courier

September 8, 2011

Commissioner Therese J. Goldsmith Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

Re: Registry and Report on Slavery Era Insurance Regulations Berkshire Hathaway Inc., NAIC Group Code 0031

Dear Commissioner:

In accordance with Maryland Insurance Administration Bulletin 11-15, the following will serve as the consolidated report submitted by General Reinsurance Corporation on behalf of the insurance company members of the Berkshire Hathaway Inc. holding company system (see Attachment A):

The following report represents the true findings and most accurate information found in connection with any slaveholder insurance policies issued in Maryland by any of the Berkshire Hathaway Inc. insurance companies or predecessor insurers during the slavery era as defined in Title 30 of the Maryland Insurance Code, Section 30-101.

Reporting Insurer:

General Reinsurance Corporation 120 Long Ridge Road Stamford, CT 06902 Telephone: (800) 431-9994

Fax: (203) 328-5877

Email: <u>AskGenRe@genre.com</u>
Website: <u>www.genre.com</u>

NAIC No.: 22039 NAIC Group No.: 0031

> General Reinsurance Corporation 120 Long Ridge Road, Stamford, CT 06902 Tel: 203-328-6027, Fax: 203-328-5877 lcoccola@genre.com, www.genre.com

A Berkshire Hathaway Company

Contact Person:

Lorraine Coccola
Assistant Vice President
General Reinsurance Corporation
120 Long Ridge Road
Stamford, CT 06902
Telephone: (203) 328-6027

Telephone: (203) 328-6027

Fax: (203) 328-5877

Email: lcoccola@genre.com

Research Methodology:

Of the reporting companies, only two, National Reinsurance Corporation and General Star National Insurance Company, through predecessor corporations, were organized and existing during the slavery era. Those companies were The Eagle Fire Company of New York, incorporated in 1906, and The Eureka Fire & Marine Insurance Company, incorporated in 1864, respectively. The remaining reporting companies were not organized prior to 1919, at the earliest.

Many, if not all, records relating to insurance policies written during the slavery era are simply no longer in existence, having been destroyed or removed in the ordinary course of business long before the enactment of the subject legislation.

A search of existing records revealed no data responsive to this statute. The methods by which this was determined include computer database searches by company name and by date, including records from the early 20th century and prior including a review of microfiche records.

Names of Slaves & Slaveholders:

None found.

Please feel free to contact me with any questions or comments you may have.

Lorraine Coccola

Enclosure Attachment A General Reinsurance Corporation – NAIC No. 22039

120 Long Ridge Road Stamford, CT 06902

Telephone: (800) 431-9994

Fax: (203) 328-5877

Website: www.genre.com

E-mail Contact: lcoccola@genre.com

General Star National Insurance Company – NAIC No. 37362

120 Long Ridge Road Stamford, CT 06902

Telephone: (800) 431-9994

Fax: (203) 328-5877 Website: www.genre.com

E-mail Contact: lcoccola@genre.com

Genesis Insurance Company – NAIC No. 38962

120 Long Ridge Road Stamford, CT 06902

Telephone: (800) 431-9994

Fax: (203) 328-5877 Website: www.genre.com

E-mail Contact: lcoccola@genre.com

Government Employees Insurance Company – NAIC No. 22063

GEICO Casualty Company - NAIC No. 41491

GEICO General Insurance Company – NAIC No. 35882

GEICO Indemnity Company - NAIC No. 22055

5260 Western Avenue Chevy Chase, MD 20815 Telephone (800) 841-3000

Fax: (301) 986-2237 Website: www.geico.com

E-mail Contact: bmcdonald@geico.com

Idealife Insurance Company – NAIC 97764

120 Long Ridge Road Stamford, CT 06902

Telephone: (800) 431-9994

Fax: (203) 328-5877

Website: www.genre.com

E-mail Contact: lcoccola@genre.com

The Medical Protective Company – NAIC No. 11843

5814 Reed Road Ft. Wayne, IN 46835

Telephone: (260) 485-9622

Fax: (260) 486-0826

Website: www.medpro.com

E-mail Contact: garrett.davenport@medpro.com

National Indemnity Company – NAIC No. 20087

National Liability & Fire Insurance Company – NAIC No. 20052

Berkshire Hathaway Assurance Corporation – NAIC No. 13070

Stonewall Insurance Company – NAIC No. 22276

Berkshire Hathaway Life Insurance Co. of Nebraska – NAIC No. 62345

Unione Italiana Reinsurance Company of America - NAIC NO. 36048

Atlanta International Insurance Company – NAIC No. 20931

Commercial Casualty Insurance Company - NAIC No. 32280

American Centennial Insurance Company – NAIC No. 10391

3024 Harney Street Omaha, NE 68131

Telephone: (800) 720-7861

Fax: (402) 916-3350

Website: www.nationalindemnity.com

E-mail Contact: info@nationalindemnity.com

National Reinsurance Corporation - NAIC No. 34835

120 Long Ridge Road Stamford, CT 06902

Telephone: (800) 431-9994

Fax: (203) 328-5877

Website: www.genre.com

E-mail Contact: lcoccola@genre.com

Seaworthy Insurance Company – NAIC No. 37923

880 S. Pickett Street Alexandria, VA 22304

Telephone: (703) 823-9550

Fax: (703) 461-4361

Website: www.boatus.com

E-mail Contact: caguerrevere@boatus.com

United States Liability Insurance Company – NAIC No. 25895 190 South Warner Road PO Box 6700 Wayne, PA 19087 Telephone: (800) 523-5545 Fax: (610) 995-0381

Website: www.usli.com

E-mail Contact: lour@usli.com

AFFIDAVIT

STATE OF CONNECTICUT)
)SS.
COUNTY OF FAIRFIELD	.)

I, Damon N. Vocke, being duly sworn state:

- 1. I am a Senior Vice President, General Counsel and Secretary Counsel of General Reinsurance Corporation, a Delaware corporation ("Corporation").
- 2. I affirm that the attached report being submitted in connection with COMAR 31.16.09 pertaining to the Registry and Report on Slavery Era Insurance Regulations ("the Report") is true and not misleading.
- 3. The information contained in the Report is the most accurate information available at the time of the submission of the Report.

Name: Damon N. Vocke Date: September 8, 2011

Title: Senior VP, General Counsel and Secretary

Sworn to before me this 8th day of September, 2011.

Notary Public

Name: Lorraine Coccola

My Commission Expires: November 30, 2012



June 8, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

RE: Slavery Era Report
Amguard Insurance Company, NAIC #42390
EastGUARD Insurance Company, NAIC #14702
Norguard Insurance Company, NAIC #31470

JUL 1 1 2011

Maryland Insurance Administration

Dear Sir or Madam:

On behalf of GUARD Insurance Group, Inc. and its affiliated Insurance Companies, AmGUARD, EastGUARD, and NorGUARD, in compliance with Title 30, Insurance Article, COMAR 31.16.09 of the Maryland Insurance Code, I respectfully submit the following:

GUARD Insurance Group, Inc. of 16 South River Street, Wilkes-Barre, PA, Telephone number (800) 673-2465, Fax # (570) 823-3081, NAIC Group #828, website URL- http://www.guard.com, submits the following information on behalf of its affiliated companies:

NAIC Code	Company Name
42390	AmGUARD Insurance Company
14702	EastGUARD Insurance Company
31470	NorgUARD Insurance Company

Company Contact Person: Jeff Picker

16 South River Street Wilkes-Barre, PA 18703 Ph# (800) 673-2465, ext 1024

Fax# (570) 824-8416 jpicker@guard.com

AmGUARD • EastGUARD • NorGUARD • WestGUARD

Home Office: 16 South River Street • P.O. Box A-H • Wilkes-Barre, Pennsylvania 18703-0020 ¹ 570-825-9900 • 800-673-2465 • FAX 570-823-5930 • www.guard.com

Research Methodology:

AmGUARD Insurance Company was formed and incorporated on June 10, 1982 well after the Slave Era and therefore did not insure any slaveholders nor issue any slaveholder policies.

NorGUARD Insurance Company was formed and incorporated on August 12, 1987 well after the Slave Era and therefore did not issue any slaveholders nor issue any slaveholders policies.

EastGUARD Insurance Company - Mutual Fire Insurance Company domiciled in Maine was originally incorporated February 23, 1827, purchased and renamed EastGUARD Insurance Company on July 1, 1995. EastGUARD was re-domesticated to the State of Pennsylvania on April 13, 2000. To the best of our knowledge information and belief neither EastGuard nor its predecessors issued slaveholder policies. We do not have access to any policy information dating back to the Slavery Era and therefore are unable to supply you with any further information on this subject.

If you have any questions or concerns with regard to the information contained in this letter, please contact State Filings Representative, Jolene Carey at (800) 673-2465, extension 4023, or by email at jcarey@guard.com.

Sincerely,

JUL 1 1 2011

Maryland Insurance Administration

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

Re: Slavery Era Report
AmGUARD Insurance Company, NAIC #42390
EastGUARD Insurance Company, NAIC #14702
NorGUARD Insurance Company, NAIC #31470

To Whom It May Concern:

On June 16, 2011 GUARD Insurance Group mailed the required Slavery Era Report to your attention. After reading Bulletin 11-15 on July 7^{th} , 2011 I realized there was an oversight and I did not include an electronic copy of the report on a cd.

Enclosed are the electronic copy and also a copy of the correspondence that was mailed on June 16, 2011. Should you have any questions, please feel free to contact me at 1-800-673-2465, Ext 4023 or by email at jcarey@guard.com.

Best,

State Filings Representative

GUARD Insurance Group



SEP 1 6 2011

Maryland Insurance
Administration

September 15, 2011

Certified Mail Return Receipt Requested

Maryland Insurance Administration Slave Era Insurance Register 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

RE: Report on Slavery Era Insurance

Dear Commissioner:

This report is submitted on behalf of the Harford Mutual Insurance Company and Firstline National Insurance Company pursuant to 31 COMAR, Subtitle 16.09. I note as an initial matter that Firstline National Insurance Company first came into existence by way of its incorporation in 1988. Consequently, it did not issue any insurance policies during the "slavery era" as defined in MD Insurance Code Ann. Section 30.101(f).

(1) Identifying Information:

(a) Name: The Harford Mutual Insurance Company

(b) Address: 200 North Main Street, Bel Air, MD 21014

(c) Telephone No.: 410-838-4000

(d) Fax No.: 410-838-8675

(e) E-mail address: jspielberger@harfordmutual.com

(f) NAIC No.: 14141- website www.harfordmutual.com

(2) Contact Person:

(a) Title: John R. Spielberger, Executive Vice President and General Counsel

(b) Address: 200 North Main Street, Bel Air, MD 21014

(c) Telephone No.: 410-838-4000, extension 286

(d) Fax No.: 410-638-8514

(e) E-mail address: jspielberger@harfordmutual.com

(3) Research Methodology:

(a) Record Identification: The Harford Mutual Insurance Company conducted a comprehensive search of its home office location for records and information that would be responsive to the reporting requirement. As further outlined below, the company further engaged the services of the Historical Society of Harford County, Inc., that included a review of external records identified in the report attached hereto as Exhibit A.

Maryland Insurance Administration Slave Era Insurance Register September 15, 2011 Page 2

- (b) Research description: The Harford Mutual Insurance Company engaged the services of the Historical Society of Harford County, Inc., to conduct and report on the research required under MD <u>Insurance</u> Code Ann. Section 30-101. A copy of that report which fully describes the research, along with methodology employed, is attached hereto as Exhibit A.
- (c) The research conducted by or through the Harford Mutual Insurance Company did not locate any responsive data.
- (4) Not Applicable
- (5) Not Applicable
- (6) Not Applicable

Respectfully Submitted,

John R. Spielberger

Executive Vige/President and General Counsel

CERTIFICATION

Pursuant to 31 COMAR, Subtitle 16.09, I hereby certify under penalty of perjury that the information contained in this report is, to the best of my knowledge, true and not misleading, and contains the most accurate information available at the time of the submission of this report.

John R. Spielberg

Executive Vice President and General Counsel

9/15/201

Date

JRS:eh

Enclosures

CLETY OF HAMPOOD CONTROL OF THE PROPERTY OF TH

The HISTORICAL SOCIETY OF HARFORD COUNTY, Inc.

Society Headquarters

143 N. Main Street • Bel Air, Maryland 21014 • 410-838-7691

Havs House Museum

324 South Kenmore Avenue • Bel Air, Maryland 21014 • 410-838-1213

Slavery Era Insurance Policy Reporting Harford Mutual Insurance Company

With respect to Title 30-102 of the Annotated Code of Maryland, the undersigned historical researchers from The Historical Society of Harford County, Inc. conducted an investigation in behalf of the Harford Mutual Insurance Company, headquartered in Bel Air, Maryland, to determine if the Company ever issued policies dealing with property in slaves prior to 1865. The research methodology used in generating and preparing their report follows.

The Harford Mutual Insurance Company was formed on November 23, 1842 at a public meeting held in the Court House in Bel Air. It was initially known as the Mutual Fire Insurance Company in Harford County and it began issuing policies in the following year. Harford Mutual staff members conducted a search for company records covering the years 1843 to 1865 and provided a total of 14 record books to the Historical Society researchers for their examination.

The first book, titled "Charter, Constitution and By-Laws, Mutual Fire Insurance Company in Harford County," stated, in part, that it "shall have full power and authority to make Insurances on any kind of property against Loss and damage by fire." Rates for Insurance Against Fire were set by class (type of building construction) and "intended for dwelling houses, and for buildings otherwise occupied at no extraordinary risk." This book also contained numerous pages of signatures by persons who assented to the company's act of incorporation, the first being signed on June 19, 1843. It also contained meeting minutes from 1843 to 1847.

The second book, titled "Policies, From No. 1 to No. 293, Mutual Fire Insurance Company in Harford County, Md.," covered the period from June 19, 1843 through January 23, 1846. During this time the company issued 293 policies to insure dwellings and other buildings (such as barns, meat houses, corn houses, kitchens, barracks, and carriage houses) and their contents against loss by fire. Some of the policies also listed additional insurance acquired in the 1850s.

The third book was untitled and contained 233 pages covering the time between July 31, 1844 and December 31, 1858. It contained detailed records of Cash Accounts, listing amounts paid to specific individuals for services rendered. Subheadings included in this ledger were profit and loss accounts, interest accounts, policy accounts, expense accounts, and state tax accounts.

The Historical Society of Harford County, Inc. is a 501(c) (3) nonprofit organization and donations are tax deductible to the fullest extent allowed by law. A copy of our current financial statement is available upon request by contacting the Society at 143 North Main Street, Bel Air, MD 21014, 410-838-7691. Documents and information submitted to the State of Maryland under the Charitable Solicitations Act are available from the Office of the Secretary of State for the cost of copying and postage.

The fourth book, also untitled, included 192 pages of minutes of various formal meetings from May 20, 1850 to January 1866: annual meetings, "special notice" meetings, and "regular day" meetings. This volume also included occasional clippings of legal notices from local newspapers. The Minutes reveal the outcome of corporate elections and proposals to changes in company by-laws and policies, attendance of the Directors, and resignations and replacement of Directors. The bulk of the business referenced dealt with receipt and investigation of claims. The Minutes identify the names of the claimants, the nature and amount of the claim, and company action with respect to the claim. All claims dealt solely with the type properties detailed in the second book above.

The fifth book, titled "Risk Book," contained 182 pages covering the years 1843 through 1858. It listed policy numbers, policyholders, insurance amounts, and amounts of the premium note. Although it contained no details about the contents of the policies themselves, the entries appear to be correlated to the information found in the second and third books cited above.

The sixth book, titled "Journal," contained 557 pages of expense accounts (per diem and mileage) and sundries paid from 1854 to 1891.

The remaining 8 books or ledgers, small in size, were each titled "Premium List" and spanned the period from 1853 through 1861. They contained information similar to the "Risk Book" cited above, and made no reference to property in slaves.

In addition to his involvement in the review of the company's record books, Mr. Peden conducted a search in the indices to the archives and library of The Historical Society of Harford County in Bel Air and the manuscripts division of The Maryland Historical Society in Baltimore. This investigation sought to determine if either of those organizations had received any Harford Mutual Insurance Company records for historical preservation:

- (1) The Maryland Historical Society published two volumes titled *The Manuscript Collections of the Maryland Historical Society*, by Avril J. M. Pedley (1968), and *Guide to the Research Collections of the Maryland Historical Society*, edited by Richard J. Cox and Larry E. Sullivan (1981). Neither of these books made any reference to Harford Mutual manuscript material.
- (2) The Historical Society of Harford County's Archives Division folder #1615, labeled "Harford Mutual Insurance Company," contained several miscellaneous items about the company. Mr. Chrismer reviewed their on-line catalog and found four additional folders (#41217, #29087, #43029, and #A-4277) that contained copies of the same information, none of which was pertinent to this search.

Additionally, Mr. Peden reviewed microfilm of the three county newspapers that are extant for part of the period in question, viz., *The Harford Madisonian*, *The Southern Aegis*, and *The National American*. His examination revealed that the Harford Mutual Insurance Company limited its advertising to occasional notices of forthcoming meetings and statements of the company's assets. The newspapers gave no evidence that the Company placed advertisements for its products or services.

In summation, after reviewing extant records, it appears that during the era prior to 1865, and for an undetermined time thereafter, the Mutual Fire Insurance Company in Harford County, now known as the Harford Mutual Insurance Company, only issued policies to insure buildings and their contents against loss by fire. There is no indication that the company ever issued life, health, or casualty insurance policies covering property in slaves.

Henry C. Peden, Jr

James E. Chrismer

September 1, 2011



David W. Galloway Vice President & Associate General Counsel Harleysville Insurance 355 Maple Avenue Harleysville, PA 19438 dgalloway@harleysvillegroup.com Tel (215) 513-8428 Fax (215) 256-5631

NCT 1 1 2011

Maryland Insurance Administration

October 3, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

Re:

Slavery Era Report

Dear Sir or Madam:

Please find enclosed the original and one copy of the Consolidated Report of Harleysville Mutual Insurance Company on its behalf and on behalf of Harleysville Insurance Company, Harleysville Preferred Insurance Company, Harleysville Worcester Insurance Company, and Harleysville Life Insurance Company.

If you have any questions, or need anything additional, please do not hesitate to contact me.

Thank you.

Very truly yours,

David W. Galloway

Encl.

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Maryland Insurance Administration

CONSOLIDATED REPORT OF HARLEYSVILLE MUTUAL INSURANCE COMPANY

In accordance with Maryland Code, Insurance, Sections 30-101 et. seq (the "Act"), Harleysville Mutual Insurance Company ("Reporting Insurer") files the following report for itself and on behalf of the members of its subsidiaries and holding company, Harleysville Group Inc., who are subject to the Act ("Member Insurers").

1. Insurer Identification

Name and Address

Harleysville Mutual Insurance Company (NAIC #14168)

Of Reporting Insurer:

355 Maple Avenue

Harleysville, Pennsylvania 19438-2297

Member Insurers:

Harleysville Insurance Company (NAIC #23582)

355 Maple Avenue

Harleysville, Pennsylvania 19438-2297

Harleysville Worcester Insurance Company (NAIC #26182)

355 Maple Avenue

Harleysville, Pennsylvania 19438-2297

Harleysville Preferred Insurance Company (NAIC# 35696)

355 Maple Avenue

Harlevsville, Pennsylvania 19438-2297

Harleysville Life Insurance Company (NAIC #64327)

355 Maple Avenue

Harleysville, Pennsylvania 19438-2297

Telephone:

215-256-5000

Telefax:

215-256-5631

Website:

www.harleysvillegroup.com

2. Contact Person

Name and Address:

David W. Galloway, III, Vice President

Harleysville Insurance

355 Maple Avenue, Harleysville, Pennsylvania, 19438

dgalloway@harleysvillegroup.com

Telephone:

215-513-8428

Telefax:

215-256-5631

3. Research Methodology

Reporting Insurer, Harleysville Mutual Insurance Company ("HMIC"), was organized and incorporated in Pennsylvania on October 17, 1917. HMIC was authorized to transact insurance business in Maryland on January 1, 1931. There was no predecessor corporation in existence prior to 1865. Likewise, Member Insurers. Harleysville Insurance Company's ("HIC") date of incorporation in Minnesota is June 9. 1930: Harleysville Preferred Insurance Company's ("H-Preferred") date of incorporation in Pennsylvania is October 30, 1985; and Harlevsville Life Insurance Company's ("H-Life") date of incorporation in Pennsylvania is November 29, 1960. There were no predecessor companies in existence prior to 1865. While Harlevsville Worcester Insurance Company ("HWIC") is the successor to Worcester Insurance Company, created in Massachusetts in 1823, neither HWIC nor its predecessor was authorized to transact insurance business in Maryland until March 23, 2007. Copies of the 'Company Details Reports' for the Reporting Insurer and the Member Insurers are attached hereto. Because none of the Harleysville insurers were authorized to write insurance in Maryland before 1865, neither Reporting Insurer nor Member Insurers have any data responsive to this question.

4. Names of Slaves

The Reporting Insurer, for itself and on behalf of the Member Insurers, has no information responsive to this question.

5. Names of Slaveholders

The Reporting Insurer, for itself and on behalf of the Member Insurers, has no information responsive to this question.

I, David W. Galloway, III, Vice President and Associate General Counsel, hereby certify and affirm, under oath, that this Consolidated Report is true and not misleading, and contains the most accurate information available at the time of the submission of this report.

David W. Galloway, III

SWORN AND SUBSCRIBED TO before me, this 3 day of October,

Notary Public

2011

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Sherry L. Clark, Notary Public Lower Salford Twp., Montgomery County My Commission Expires May 27, 2012

Member, Pennsylvania Association of Notaries

Company Details Report

Harleysville Mutual Insurance Company

355 Maple Ave. Harleysville, Pennsylvania 19438 USA

NAIC Number: 14168

Phone Number: 215.256.5077

State of Domicile: PA

Detailed Information:

Company Status:	Active
Business Types:	Property and Casualty
Lines of Business:	Marine, Wet Marine and Transportation Workers Compensation Casualty Health Property and Marine Surety Vehicle Liability

Application Type	Original Approval Date
Fully Licensed NAIC Company	01.01.1931

Harleysville Worcester Insurance Company

355 Maple Avenue Harleysville, Pennsylvania 19438-2297 USA

NAIC Number: 26182

Phone Number: 508.751.8100

State of Domicile: PA

Company Status:	Active
Business Types:	Property and Casualty
Lines of Business:	Casualty Marine, Wet Marine and Transportation Property and Marine Surety Vehicle Liability Workers Compensation

Application Type	Original Approval Date
Fully Licensed NAIC Company	03.23.2007

Harleysville Insurance Company

Braemer Office Park 7900 West 78th Street, Ste. 400 Edina, Minnesota 55439 USA

NAIC Number: 23582

Phone Number: 800.727.5353

State of Domicile: PA

Company Status:	Active
Business Types:	Property and Casualty
Lines of Business:	Workers Compensation Casualty Health Marine, Wet Marine and Transportation Property and Marine Surety Vehicle Liability

Application Type	Original Approval Date
Fully Licensed NAIC Company	10.29.1984

Harleysville Preferred Insurance Company

355 Maple Ave.

Harleysville, Pennsylvania 19438

USA

NAIC Number: 35696

- - - - - -

Phone Number: 215.256.5000

State of Domicile: PA

Company Status:	Active
Business Types:	Property and Casualty
Lines of Business:	Workers Compensation Casualty Health Marine, Wet Marine and Transportation Property and Marine Surety Vehicle Liability

Application Type	Original Approval Date
Fully Licensed NAIC Company	10.25.1983

Harleysville Life Insurance Company

355 Maple Avenue Harleysville, Pennsylvania 19438 USA

NAIC Number: 64327

Phone Number: 215.513.6400

State of Domicile: PA

Company Status:	Active
Business Types:	Life and Health
Lines of Business:	Health Life

Application Type	Original Approval Date
Fully Licensed NAIC Company	05.01.1963

Nancy Egan - Maryland Slavery Era Report

From: "Sellinger, John" < JSellinger@harleysvillegroup.com>

To: "'NEgan@mdinsurance.state.md.us'" <NEgan@mdinsurance.state.md.us>

Date: 4/5/2012 10:22 AM

Subject: Maryland Slavery Era Report

CC: "Galloway, David Skip" < DGalloway@harleysvillegroup.com>

Ms. Egan, thank you for your email from last Friday, March 30, 2012. Mr. Galloway asked me to respond to your inquiry since I helped him in preparing Harleysville's report. Although Harleysville Worcester Insurance Company can trace its roots back to 1823, it was originally formed as a mutual insurance company named Worcester Mutual Fire Insurance Company. Worcester Mutual operated only within Massachusetts until 1906 when the company expanded into Connecticut and Rhode Island. It did not begin to operate in any state adjoining Maryland until the 1950's. Consequently, and although we do not have access to any of the policy records from 1865 and before, Harleysville Worcester can state with confidence that it did not issue any insurance policies covering slaves in Maryland.

Please let us know if you have any questions or wish to discuss this further.

Thank you.

John J. Sellinger
Assistant V.P. & Assistant General Counsel
Harleysville Insurance
355 Maple Avenue
Harleysville, PA 19438
215-256-5205 (direct)
215-256-5631 (fax)

Nancy Egan - RE: Slavery Era Report

From:

Nancy Egan

To:

Galloway, David Skip

Date:

3/30/2012 1:44 PM

Subject: RE: Slavery Era Report

Dear Mr. Galloway,

Thank you for your prompt response. I realize that this company was not authorized to write insurance in Md until 2007. I am inquiring about your predecessor during the slavery era period. Were the records of the Worcester Insurance Company searched for any slavery policies? We understand that you were not authorized to write business in Md but there may have been some policies with Md connections during that older period. I just want to clarify if any actual research was undertakened?

Thank you for your response.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

>>> "Galloway, David Skip" <DGalloway@harleysvillegroup.com> 3/26/2012 4:00 PM >>>

Dear Ms. Egan:

Harleysville Worcester was not authorized to write insurance in Maryland until March of 2007. When we purchased the Company it was not licensed in Maryland.

Very Truly Yours,

David W. Galloway

V.P & Associate General Counsel

Harleysville Insurance

From: Nancy Egan [mailto:NEgan@mdinsurance.state.md.us]

Sent: Monday, March 26, 2012 3:41 PM

To: Galloway, David Skip Subject: Slavery Era Report Dear Mr Galloway,

We are in receipt of your report filed on 10/11/2011. You indicated that the predecessor company of Harleysville Worcester Insurance Company was Worcestor Insurance Company which was founded in 1823 pre 1865. Your report does not indicate whether this company insured any policyholders against the loss of a slave during that time period. Please provide further details for our study.

Thanking you in advance for your prompt response.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

The information contained in this e-mail, and attachment(s) thereto, is intended for use by the named addressee only, and may be confidential or legally privileged. If you have received this e-mail in error, please notify the sender immediately by reply e-mail or by telephone at the number listed above and permanently delete this e-mail message and any accompanying attachment(s). Please also be advised that any dissemination, retention, distribution, copying or unauthorized review of this communication is strictly prohibited.

850 6 2011

Maryland Insurance Administration



Kristen Burns Counsel Direct Dial: 860.547.9839 Facsimile: 877.669.9116 kristen.burns@thehartford.com

September 14, 2011

Therese M. Goldsmith
Insurance Commissioner
Maryland Insurance Administration
Slavery Era Insurance Registry
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Re: Report on Slavery Era Insurance

Dear Ms. Goldsmith:

This report pursuant to Section 31.16.09 of the Code of Maryland Regulations is the report of the insurance companies that are members of the Hartford Financial Services Group ("The Hartford").

As stated below, The Hartford's life insurance companies, and some of its property and casualty insurance companies, were not in existence during the relevant time period and are not successors in interest to any companies that were in existence. As for the balance of The Hartford's property and casualty insurance companies, The Hartford has found no data responsive to this statute.

1) Insurer Identification

The company name and NAIC number of the insurance companies comprising The Hartford who are authorized to do business in the state of Maryland are outlined below. Each of these companies has authorized the Hartford Fire Insurance Company as the reporting insurer for purpose of compliance with section 31.16.09.03 of the Maryland Code.

Group NAIC Code 0091

Hartford Fire Ins. Co. (19682)
Hartford Casualty Ins. Co. (29424)
Hartford Accident and Indemnity Co. (22357)
Hartford Underwriters Ins. Co. (30104)
Twin City Ins. Co. (24959)
Pacific Ins. Co., Limited (10046)
Sentinel Ins. Co., Ltd. (11000)
Hartford Ins. Co. of the Midwest (37478)

Trumbull Ins. Co. (27120)

Nutmeg Ins. Co. (39608)

Property& Casualty Ins. Co. of Hartford (34690)

American Maturity Life Ins. Co. (81213)

Hartford International Life Reassurance Corp. (93505)

Hartford Life and Accident Ins. Co. (70815)

Hartford Life and Annuity Ins. Co. (71153)

Hartford Life Ins. Co. (88072)

One Hartford Plaza, HO-01-09 Hartford, CT 06155 Hartford Fire Insurance Company is located at One Hartford Plaza, Hartford, CT 06155. The URL for the Hartford Website is: http://www.thehartford.com. Other relevant contact information for the Company appears below in paragraph (2).

2) Contact Person

Kristen Burns Counsel, Corporate Compliance The Hartford One Hartford Plaza Hartford, CT 06115

Phone: 860-547-9839 Fax: 877-669-9116

Email: Kristen.Burns@thehartford.com

3) Research Methodology

The only insurance company member of The Hartford that was in existence during the relevant time period (prior to December, 1865) is Hartford Fire Insurance Company, a property and casualty company. The remaining companies, including all of The Hartford's life insurance companies, were not in existence during the relevant time period and are not successors in interest to any company that was in existence. The Hartford has found no data responsive to the statute.

With respect to Hartford Fire Insurance Company, the following research methodology was undertaken:

- A search was conducted of The Hartford's off-site records storage facility. No policy records, underwriting files, correspondence, or other records for the relevant time period were discovered;
- A search was conducted of The Hartford's historical archives and all policy records and correspondence from the relevant time period were reviewed. No data responsive to the statute was discovered;
- A search was conducted of the Hartford Controllers' records and Annual Statement records. No data responsive to the statute was discovered;

- A review was conducted of the Minutes of the meetings of Hartford Fire's Board of Directors for the relevant time period. No data responsive to the statute was discovered;
- A review was conducted of *The Hartford of Hartford* by Hawthorne Daniel, Random House, 1960. This book is a history of The Hartford. No information relevant to the statute was discovered.

Sincerely,

Kristen Burns

Counsel, Corporate Compliance

André Antonio Napoli, first, being duly sworn, deposes and says that he is President and Chief Executive Officer of Hartford Fire Insurance Company; that he has read the attached papers comprising the Registry and Report on Slavery Era Insurance, pursuant to Maryland Code 31.16.09.03, by Hartford Fire Insurance Company on behalf of itself and its affiliated companies, and that the contents are true and not misleading and contain the most accurate information available at this time.

André Antonio Napoli

President and Chief Executive Officer Hartford Fire Insurance Company

ance G. Mym.

Subscribed and sworn to before me this

14⁴h day of September, 2011.

Notary Public in and for Hartford County, State of Connecticut.

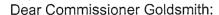
My commission expires August 31, 2014

PATRICIA R. SCIROCCO NOTARY PUBLIC MY COMMISSION EXPIRES AUG. 31, 2014



September 22, 2011

Maryland Insurance Administration Office of the Commissioner 200 St. Paul Place, Suite 2700 Baltimore, MD 21202



Infinity Property & Casualty Corporation (Holding Company) designates Infinity Insurance Company (NAIC#: 22268) to submit a consolidated report pursuant to MD § 30-102 (b) on behalf of the insurer as well as other members, subsidiaries and divisions in the Holding Company.

Maryland Park Administration

Infinity Insurance Company submits this report on behalf of the following companies:

- 1. Infinity Premier Insurance Company (NAIC#: 37001)
- 2. Infinity Casualty Insurance Company (NAIC#: 21792)
- 3. Infinity Reserve Insurance Company (NAIC#: 10968)
- 4. Infinity Specialty Insurance Company (NAIC#: 31925)
- 5. Infinity Select Insurance Company (NAIC#: 20260)
- 6. Infinity Auto Insurance Company (NAIC#: 11738)
- 7. Infinity Preferred Insurance Company (NAIC#: 10195)
- 8. Infinity Indemnity Insurance Company (NAIC#: 10061)
- 9. Infinity Assurance Insurance Company (NAIC#: 39497)
- 10. Infinity Standard Insurance Company (NAIC#: 12599)
- 11. Infinity County Mutual Insurance Company (NAIC#: 13820)
- 12. Infinity Safeguard Insurance Company (NAIC#: 16802)
- 13. Infinity General Insurance Company (NAIC#: 35211)
- 14. Infinity Security Insurance Company (NAIC#: 38873)
- 15. Hillstar Insurance Company (NAIC#: 10068)
- 16. Infinity Insurance Company (NAIC#: 22268)

Infinity Insurance Company hereby certifies and affirms under oath that the following report is true and in no way misleading. Furthermore, we do certify and affirm under oath that this report contains the most accurate information available.

We have determined that at no time in the past did any of our members, subsidiaries or divisions write directly or through our predecessors any "Slaveholder Insurance Policies" as defined under Maryland Insurance Code § 30-101 (e).

Sincerely

Samuel J. Simon

Senior Vice President & Secretary

Sworn and subscribed before me this 22nd day of September, 2011.

Frances H. Medders, Notary Public My commission expires 4/24/2013

American Premier Underwriters, Inc



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Gale Directory of Company Histories: American Premier Underwriters, Inc.

Top

Home > Library > Business & Finance > Company Histories

Type: Public Company

Sales: \$1.8 billion

Address: 1 East Fourth Street, Cincinnati, Ohio 45202-3717, U.S.A.

Telephone: (513) 579-6600 Fax: (513) 579-0108 Employees: 5,400

Stock Exchanges: Boston Midwest New York Pittsburgh Pacific Incorporated: 1846 as Pennsylvania Central Railroad Company

SIC: 6331 Fire, Marine & Casualty Insurance

Although property and casualty insurance company American Premier Underwriters, Inc. adopted its current focus over the past few years, the company has a history of over 150 years that reflects the development of the national transportation and commerce industries. In the nineteenth century, the company gained renown as the Pennsylvania Central Railroad Company. Developing into a highly diversified conglomerate, the company was known as The Penn Central Corporation from 1978 through March 1994, when it dropped its well known rail-related name in favor of a title that more accurately described its business activities in the 1990s--property and casualty insurance.

The Pennsylvania Railroad Company and the New York Central Railroad, which merged in 1968 to form the Penn Central Transportation Company, were the two largest railroads in the United States and traced their histories to the early 1800s. The Pennsylvania Railroad, or 'Pennsy,' as it became known, had first linked the Atlantic seaboard with the tributaries of the Mississippi River system in the 1850s. During this time, Pennsy grew so powerful that it called itself 'the Standard

The Pennsylvania Railroad Company was incorporated by the Commonwealth of Pennsylvania in 1846 with a capitalization of \$10 million. Formed by a group of Philadelphia businessmen and politicians who hoped to link the City of Brotherly Love to the <u>bustling</u> commerce of the West, the railroad paid a <u>dividend</u> in 1848, the first of an <u>uninterrupted</u> series that lasted until the Pennsylvania Railroad was absorbed into Penn Central in 1968.

Pennsy's principal investors were primarily involved in industries that would benefit from the railroad, and none devoted their full attention to the Pennsy. The company's first president, Samuel Vaughn Merrick, had no specialized knowledge of railroads, and he soon hired J. Edgar Thomson, a chief engineer with 20 years of railroad experience, who was known as one of the nation's leading railroad experts. Thomson soon proved so valuable and knowledgeable that he could virtually run the railroad without his superiors. Merrick resigned in 1849, and after continued conflicts with new president William Patterson, Thomson led a successful coup in 1852 that culminated in his election as chairperson and president. That year, the Pennsy completed its initial 30-mile line from Harrisburg to Pittsburgh.

Thomson quickly set out to realize his ambitious plans for the Pennsy. After legislation was passed permitting the purchase of interests in other railroads, Thomson acquired stakes in four small, struggling lines in Ohio and Indiana. In 1857, he completed three years of negotiations to purchase Pennsylvania's Main Line railroad for \$7.5 million in bonds, making the Pennsy the state's premier rail system. During his 20-year tenure at the Pennsylvania Railroad, Thomson increased the railroad's trackage from 350 to over 1,000 miles and its gross revenues from \$2 million to over \$22 million annually. By the onset of the Civil War, the Pennsylvania Railroad had expanded from Pittsburgh through Fort Wayne and on to Chicago, with access to virtually all of southern Ohio, Indiana, and Illinois

In 1872, Thomson created The Pennsylvania Company, a holding company organized to manage the system, which by this time extended along the East Coast from Jersey City to Washington, D.C., went as far west as St. Louis, and featured northern destinations in New York and Mackinac City in Michigan's upper peninsula. That year, the respected railroader died at the age of 66 and was replaced by a close ally, Thomas Scott, formerly senior vice-president of the Pennsy. Scott managed the railroad during an eight-year period during which stockholder concerns about overextension prevented further expansion westward.

During this time, the Pennsy's future partner, New York Central, was also gaining prominence. New York Central was created from the 1853 consolidation of ten separate short lines under the direction of merchant-financier-manufacturer Erastus Corning. Unlike the Pennsy, however, the New York Central had a rocky start; Corning regarded the railroad as an extension of his own businesses, and his self-interest stunted the railroad's early development

The New York Central began to realize greater success after the presidency was assumed by Cornelius Vanderbilt in 1867. Known as the Commodore, Vanderbilt was an esteemed speculator and one of the wealthiest men in the United States. Using his own railroad holdings to close off the New York Central's vital link to New York City, Vanderbilt forced the Central's stock prices down. He then took advantage of the low stock price, purchasing 87 percent of the stock and



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capturing the presidency. After Vanderbilt's death in 1877, son William Vanderbilt assumed the presidency, overseeing expansion in the form of several important acquisitions, including that of the Nickel Plate Railroad in 1882. During this period, financier J.P. Morgan earned a seat on the board of New York Central and soon became a key figure in American railroading. William Vanderbilt resigned in 1883 and selected James Rutter as his successor. When Rutter died suddenly two years later, a younger Cornelius Vanderbilt assumed the presidency. Chauncey M. Depew, a lawyer and lobbyist, replaced Vanderbilt in 1899 and served until his death in 1928.

Neither the New York Central nor the Pennsy expanded its routes substantially in the early years of the twentieth century, in spite of the <u>unremitting</u> shift of economic power from the East Coast to the West and South. Due to government regulation and mutual agreement, the two railroads had largely cur-tailed their previously <u>cutthroat</u> competition. At this time, the New York Central had almost twice as much trackage as the Pennsy, while the latter moved more freight and people. New York Central controlled almost every important <u>anthracite</u> coal carrier in the region, and the Pennsy dominated <u>bituminous coal</u> commerce.

The Pennsy reached the <u>anex</u> of its power during the presidency of Alexander Johnston Cassatt (brother of painter Mary Cassatt), who succeeded Frank Thomson after his death in 1899. Trained as an architectural engineer, <u>Cassatt</u> concentrated on enhancing the railroad's capacity for transporting people and goods. Within seven years, he invested almost \$500 million in improvements and additions, including the quadrupling of the trackage between New York City and <u>Altoona</u>, Pennsylvania. Cassatt's greatest accomplishment, however, was extending the railway directly into Manhattan. Before 1910, New York bound passengers ended their rail trip on the Pennsy at Jersey City, where they transferred to ferries for the trip across the Hudson River to New York City. In 1900, the Pennsy purchased control of the Long Island Railroad and undertook construction of an underground railway from New Jersey under the Hudson River to a terminal in New York City and under the East River to Long Island. Construction of this costly, complicated project commenced in 1904, and the first trains arrived in New York's Pennsylvania Station in 1910.

From the 1860s until World War I, the rail industry held a virtual monopoly on ground transport, and the Pennsy and New York Central dominated transportation in the East, where industry was central and freight and passenger traffic was greatest. To link Chicago and New York, both railroads built luxurious, first-class lines, the <u>opulence</u> of which symbolized their dominance in the industry.

However, for most American railroads the advent World War I meant high labor and maintenance costs and artificially low rates, which forced them to borrow to maintain lines and order new rolling stock. During the global conflict, the federal government assumed control of all railroads in the country to coordinate them for the war effort. These events precipitated a shake out in the rail industry after the government relinquished control.

Moreover, beginning in the 1920s, the establishment of highways and the trucking industry began to challenge the railroads' monopoly on inland transportation. Despite technological advancements in electric and diesel locomotion, rail transportation had several disadvantages in competition with trucking. For example, railroads were forced to maintain large, expensive freight yards in all major cities, and were less flexible than the trucking industry. To offset its losses, the Pennsy began to purchase passenger bus companies in the late 1920s, taking an equity position in the Motor Transit Corporation (which became the Greyhound Corporation and adding 8,000 route miles to the eastern bus line. The railroad also made its services more versatile through the acquisition of several trucking companies during this time.

The diversion of traffic from rail to road accelerated in the 1930s. Although gasoline and rubber shortages during World War II temporarily reversed this trend, the use of trucks and buses continued to increase in the post-war era. Nevertheless, in the 1950s the Pennsylvania Railroad was America's largest transportation business, as its more than 10,000 miles of tracks linked New York City, Chicago, and St. Louis, three of the nation's largest commercial centers. In 1956, Fortune magazine noted that the railroad's assets totaled over \$3 billion, significantly more than the second largest transportation company, the New York Central, whose assets topped \$2.5 billion. Only three of Fortune's 500 largest industrial corporations reported more assets than the Pennsy.

Nevertheless, the financial security of the Pennsy and New York Central during this time began to weaken. Robert Young, a leader of the Chesapeake and Ohio Railroad, had begun amassing shares in the New York Central in preparation for a takeover in 1946 and was rebuffed two years later by the Interstate Commerce Commission (ICC), which was wary of railroad monopoly. In 1954, Young made a second, more blatant overture: after garnering 15 percent of the New York Central's equity, he launched a dramatic proxy fight with then-chairperson William White. White and Young launched campaigns—complete with slogans, buttons, and public appearances—for control of the railroad, and Young won the contest by more than a million proxies.

The new, relatively <u>inexperienced</u> chairperson brought in Alfred Periman as president to help modernize and automate operations and develop the company's freight transport system. Upon accepting the position, Periman found that the New York Central was close to bankruptcy, having invested \$264 million in its passenger services from 1946 to 1957 and losing \$500 million in the process. Periman immediately undertook cost-cutting measures, firing 25,000 employees between 1954 and 1957, selling \$9 million in real estate in 1955 alone, and investing as little as possible in passenger services. Despite Periman's efforts, however, stock declined to its 1946 price of \$15.

The Pennsy was also struggling. Although its freight business was profitable—it brought in a record \$787 million in 1953—its passenger service faced several challenges. The strong demand for rush-hour rail service into large cities forced the Pennsy to maintain large pools of equipment and a substantial labor force to service a limited number of passengers between 6:00 and 9:30 a.m. and 4:30 and 7:00 p.m. Led by chairperson James Symes, the Pennsy tried to achieve economies by trimming its less profitable lines as much as the ICC would allow. Still, operating revenues declined from over \$1 billion in 1953 to \$844 million in 1958, and dividends were slashed from \$1.25 per share in 1947 to \$.25 in 1958.

Leading railroaders petitioned Washington for help, claiming that the taxes they paid supported competitive forms of transportation such as state and federal highway systems, waterways, airlines and airports, and public bus and truck terminals. The Transportation Act of 1958 offered government loans to struggling railroads, but by this time, rail leaders had arrived at their own solution, and cautious merger talks began.

During this time, Symes and Robert Young initiated merger negotiations between the Pennsylvania and New York Central railroads, but several factors and factions stood in the way of the merger. The ICC, the U.S. Justice Department, congressional anti-monopolists, executives of other eastern railroads, and the trucking interests all contested the alliance. Merger talks continued for over a decade, often hindered further by poor relations between New York Central's Perlman (who entered the negotiations after Young's suicide) and Symes and his 1963 successor, Stuart Saunders, of the Pennsy.

In the meantime--using the nearly 100-year-old Pennsylvania Company as an investment vehicle--Saunders began to diversify the Pennsylvania Railroad. During his first two years as company chairperson, he spent over \$200 million developing or purchasing real estate (including part of Madison Square Garden), coal and salt mines, the Buckeye Pipe Line Company (the eighth-largest processor of crude oil in the United States), and amusement parks. He also recouped \$65 million on the 1965 sale of most of the Long Island Railroad to New York's Metropolitan Commuter Transportation Authority.

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American Premier Underw American Financial Group The ICC approved the merger of the New York Central and Pennsylvania railroads in March 1965. The U.S. Supreme Court finally ruled in its favor early in 1968, and the alliance was formalized in February of that year. The Pennsy clearly dominated from the onset: Saunders assumed the chair, Perlman became vice-chairperson, and the company's first annual report traced the company's history to 1846, the date of the Pennsy's charter.

The company that emerged from this amalgamation, Penn Central Transportation, operated one-third of America's passenger trains and three-fourths of all long-haul services, totaling over 20,000 route miles in 16 states, two Canadian provinces, and the District of Columbia. However, the company's new stature also brought problems. A staff of 94,000 consumed 59 percent of the company's revenues, and Penn Central racked up a \$49 million deficit in 1969 and lost \$83.4 million in the first quarter of 1970 alone. Facing long-term loan payments of nearly \$200 million that would soon be due, Saunders sought the help of the Nixon Administration. When Congress declined to honor loan assurances offered by the Department of Defense, Penn Central's board of directors fired Saunders, Perlman, and other top officials in June 1970. Later that month, Penn Central filed for reorganization under Section 77 of the Bankruptcy Act, which enabled continued operations rather than liquidation of the corporation. Penn Central was followed into bankruptcy by six other northeastern railroads.

Realizing the importance of a massive rail system to many industries and travelers, the government worked to bolster Penn Central. In the hopes that eliminating passenger operations would help revive the railroads, the government developed the National Railroad Passenger Corporation (Amtrak) in 1971 to take over operation of the nation's passenger trains. Still, all seven northeastern railroads would hobble through a recession, a destructive hurricane, and finally the oil crisis, until April 1976, when a new federally funded entity, the Consolidated Rail Corporation (Conrail) was created to assume their rail operations.

During this time, Penn Central's board brought in a veteran railroader, William H. Moore, as president in September 1970. Moore first tackled <u>lingering</u> rivalries between Pennsy and Central employees, replacing old logos with a symbol for the new corporation, but, like his predecessors, he found deeper problems. After nursing Penn Central through four of its toughest years, Moore was unceremoniously replaced by trustee Jervis Langdon, Jr.

Penn Central began a new life with the assets accumulated primarily by Stewart Saunders, including the gas pipeline company, coal leases, valuable real estate and air rights over such parcels as New York City's Grand Central Terminal. Then, in January 1981, the company received cash of \$2.1 billion in compensation for its rail properties from the U.S. government and tax loss carry forwards of \$2.2 billion. Penn Central used this cash to make several acquisitions, including Marathon Manufacturing, which made oil rigs; G.K. Technologies, an electronics company; Buckeye Gas Products, which dealt in propane gas; and Sprague Electric, a manufacturer of capacitors. Many of these acquisitions proved to be unprofitable. By 1982, American Financial Corp.'s Carl Lindner amassed enough stock in Penn Central to be elected to the company's board, and in 1983, he became chairman.

In the mid-1980s, the company began narrowing its focus by selling certain of its operating assets, primarily Buckeye PipeLine and Buckeye Gas. By the spring of 1987, Lindner had assumed the additional role of chief executive officer, and Penn Central accelerated the sales of most of its earlier acquisitions, increasing its available cash to \$1.1 billion and reducing its debt to five percent of capital.

In 1989, the company acquired its first insurance operation, Republic Indemnity Co. of America, a large writer of worker's compensation insurance in California. In 1990, three non-standard auto insurance companies were acquired.

In the early 1990s, Lindner continued to refine Penn Central's focus to profitable insurance businesses. General Cable Corp. was formed to control Penn Central's primary manufacturing businesses and then was spun off to shareholders in 1992. Later that year, the company put its defense and industrial products units, including Vitro Corp. (a provider of systems and software engineering for the military) up for sale. Nine non-insurance business units and major assets were sold over an 18-month period beginning in 1992, providing about \$330 million in sales proceeds. Penn Central's 1993 revenues totaled \$1.76 billion, a \$338.4 million increase over the previous year. The divestitures of non-insurance businesses were virtually completed by the end of 1993, and culminated in the March 1994 name change to American Premier Underwriters, Inc. Upon announcing the name change, Carl Lindner III--who joined his father at the company as president and chief operating officer--remarked that the new name reflected the company's sole focus on property and casuality insurance and that he hoped to expand American Premier Underwriters' automobile insurance businesses through both internal growth and acquisition.

Principal Subsidiaries

Republic Indemnity Company of America; Atlanta Casualty Company; Infinity Insurance Company; Windsor Insurance Company; Leader National Insurance Co.; Apparatus Division; Penn Central Real Estate Group.

Further Reading

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— April Dougal Gasbarre

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Infinity History



Like most great companies, we started small. We proudly trace our roots back to 1955 when we began doing business as the Dixie Insurance Company in the heart of the American South. From our first client in eastern Alabama to today as we serve clients in 43 different states, one thing has never changed: we know that we can only grow by earning the trust of each and every client.

Thanks to our clients' trust and over 50 years of hard work, Infinity now ranks among the top 50 Property & Casualty Insurance companies in the country and employs over 1,900 people across the U.S. Expanding Infinity's reach far beyond our employees, our partnership with independent insurance agencies is better than ever and together we've made Infinity the second largest writer of non-standard automobile insurance in the nation.

What does this mean to you? It means that whether you have a perfect driving record with no problems getting car insurance, or if your record is less than great and you have a hard time with other car insurance companies due to accident(s), violation(s), age, occupation, or type of vehicle... there's a good chance we can help!

Today, Infinity Property & Casualty Corporation (IPCC) is the combination of the Infinity Insurance Companies, Atlanta Casualty Companies, Leader Insurance, Windsor Auto, and Great American Personal Lines Companies. Check out our timeline:

Timeline

1955 - Dixie Insurance Company originates in Anniston, AL, to later be known as The Infinity Group

1991 – Pennsylvania Company (sister company of American Premier Underwriters) buys The Infinity Group

1995 – American Premier Underwriters, Inc. and the American Financial Corporation join forces and become the American Financial Group (AFG)

2002 - AFG transfers all common stock of Infinity and its sister companies to IPCC

2003 - IPCC goes into initial public offering on NASDAQ

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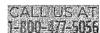
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MANHATTAN LIFE

September 29, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202 SEP 30 2011
Maryland Insurance
Administration

Re: COMAR 32.26.09 - Registry and Report on Slavery Era Insurance Regulations

Dear Commissioner Goldsmith:

The following is the report on Slavery Era insurance from the Manhattan Life Insurance Company.

A. The report required by Regulation .03A of COMAR 31.16.09.04 is true and not misleading and it contains the most accurate information available at the time of submission of the report.

B.

- (1) The Manhattan Life Insurance Company, a New York life insurance company, founded in 1850, has its administrative offices at 10700 Northwest Freeway, Third Floor, Houston, Texas 77092. The company's phone number is 800 669-9030. The fax number is 713 821- 6472. The email address is csc@manhattanlife.com. The NAIC number is 65870 and the website is manhattanlife.com.
- (2) The contact person for the subject report is Mary Lou Rainey, Manhattan Life Insurance Company, Corporate Counsel, 10700 Northwest Freeway, Third Floor, Houston, Texas 77092. Mary Lou's telephone number is 713 821-6448, her fax number is 713 821-6472. Her email address is mrainey@manhattanlife.com.
- (3). We reviewed a pamphlet from 1961 called <u>The Old Reliable the Story of Manhattan Life</u>. It included a speech given about the company history by Thomas Lovejoy, Jr., the then President of the Manhattan Life Insurance company. It made no referenced to slaves; however, it referenced a particular policy on the lives of Chinese Coolies written in 1854, a copy of which was obtained from a New York museum. There are no known documents in the company's possession that address Slavery Era insurance.
- (4) No responsive data was found regarding slaves.
- (5) (a) (b) the above described pamphlet described insurance on the lives of 700 Chinese coolies. It did not state whether or not the coolies were wage earners.
 - (c) the policyholder was Howland and Aspinwall, a New York ship builder.
 - (e) China
 - (f) China
 - (g) The sailing ship was the Sea Witch from China to Panama in 1854
- (6) The ship owners were Howland and Aspinwall
 - (d) New York

MANHATTAN

MANHATTAN LIFE

(7) The only records available are a copy of the 1961 speech from Thomas Lovejoy, Jr. and a copy of the February 22, 1854 policy, the original of which is at the Museum of the City of New York. Both are enclosed for your review.

Please let me know if you are in need of any additional information or assistance. Thank you for your courtesies.

Sincerely,

Mary Lou Rainey Corporate Counsel

Enclosure

I affirm that this report is true and not misleading and that it contains the most accurate information available at the time of the submission of the report.

Dan George, President

Sworn and subscribed before me this the <u>29th</u> day of <u>Sept.</u>, 2011.

Notary Public in and for the State of

SANDRA NELLIS Notary Public, State of Texas My Commission Expires January 14, 2014

10700 Northwest Freeway Houston, TX 77092 Phone: 713-529-0045 Toll Free: 800-669-9030 MANHATTAN



The Manhattan Life Insurance Company OF NEW YORK:

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Mount, \$21,000

Date, February 22 185 V

Annual Premium, \$ 840.

Register C

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Office of Manhattan Life Insurance Company,



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Countersigned thisday of1S5

"The roads you travel so briskly lead out of dim antiquity, and you study the past chiefly because of its bearing on the living present and its promise for the future."

—LIEUTENANT GENERAL JAMES G. HARBORD, K.C.M.G., D.S.M., LL.D., U.S. ARMY (RET.) (1866-1947)

> Late American Member of Council at London The Newcomen Society of England

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The Old Reliable The Story of The Manhattan Life

THOMAS E. LOVEJOY, JR.





ALONZO A. ALVORD

First President—The Manhattan Life Insurance Company

"The story of The Manhattan Life is a story of the coordinated efforts of many fine hard working people, who have conducted the affairs of the Company over the years with integrity and skill, so that the Company has now served the public with distinction for III years. During the III years there have been five major wars, if we include Korea, and four major depressions or panics.

"Back in 1850 a group of thirty prominent New York City citizens banded together to organize The Manhattan Life. Among this group were Caleb S. Woodhull, Mayor of the City of New York; Ambrose C. Kingsland, who became Mayor in 1851 upon Mr. Woodhull's retirement from political life; Edwin D. Morgan, who later became Governor of the State of New York; Myndert Van Schaick, an ancestor of George S. Van Schaick, who was Superintendent of Insurance of the State of New York during the 1930s; and Henry Stokes, a member of a family associated with The Manhattan Life for over one hundred years."

-THOMAS E. LOVEJOY, JR.

The Old Reliable

The Story of The Manhattan Life

THOMAS E. LOVEJOY, JR.

MEMBER OF THE NEWCOMEN SOCIETY

PRESIDENT

THE MANHATTAN LIFE INSURANCE COMPANY

NEW YORK



THE NEWCOMEN SOCIETY IN NORTH AMERICA
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1961

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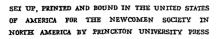
FIRST MANHATTAN LIFE TRADEMARK

This Newcomen Address, dealing with the history of The Manhattan Life Insurance Company, was delivered at the National Newcomen Dinner of The Newcomen Society in North America, held in Ballroom of The Pierre, at New York, N.Y., U.S.A., when Mr. Lovejoy

was the guest of honor, on November 15, 1961

m.







INTRODUCTION OF MR. LOVEJOY, AT NEW YORK ON NOVEMBER 15, 1961 BY G. ROWLAND COLLINS, DEAN EMERITUS, GRADUATE SCHOOL OF BUSINESS ADMINISTRATION, NEW YORK UNIVERSITY; MEMBER OF THE NEW YORK COMMITTEE, IN THE NEWCOMEN SOCIETY.

My fellow members of Newcomen:

EORGE BERNARD SHAW once said that the way to introduce a guest speaker is to take the utmost trouble to find the right things to say and then to say them with the utmost levity.

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At the outset, then, permit me to inform you that your guest speaker tonight has two public addresses in his barrel. To reassure you, I think that I should announce right now that he does not intend to deliver them both on this occasion.

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Manhattan Life folklore has it, as some of you may know, that, in spite of his personal religious persuasion, Mr. Lovejoy was once invited to address an important Holy Name Society breakfast. During the breakfast service, the high Catholic cleric seated next to him several times leaned over and whispered: "Mr. Lovejoy, in your remarks this morning, I do hope that you will be careful not to get too technical and not to burrow too deeply into the dust bins of the centuries." Finally, puzzled and just a bit perturbed Mr. Lovejoy turned to his clerical companion and dealt the retorn courteous. "Father," he said, "I have only two public addresses One deals with the growth and the economic significance of the Life Insurance Industry. Inevitably, it is, here and there, a bitechnical and naturally, it is somewhat historical. My other talk Father, more nearly meets your bill of particulars. It is entitled 'The Joy of Being a Good Presbyterian.'" To which, the Holy Father, with a wry smile, quickly responded: "All right, young man. You win! We'll take the one on Insurance, economics, his tory, technicalities, and all!"

Now, somehow I expect that this evening, you are going to get the Insurance address, and—in the honored tradition of The Newcomen Society in North America—a capsuled story of The Manhattan Life Insurance Company and its progress through the one hundred and eleven years that have passed since its genesis.

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Your guest speaker this evening was born on March 3, 1906, south of the Mason and Dixon Line, at Hawkinsville, Georgia. The family record has it that at an early moment he began to exercise his vocal chords lustily and gave substantial evidence of oncoming prowess in "filibustering" which, realized down through the years, has served him in good stead on frequent occasions.

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Mr. Lovejoy received his secondary school education at the Riverdale School, Riverdale-on-the-Hudson, New York, and was graduated from Yale University in 1928 with the degree of Bachelor of Philosophy. As a son of Yale, on occasion, he has been known to boast of his filial loyalty to Alma Mater. Now, while I am convinced that his filial loyalty is built out of sterner stuff than the frothy academic allegiance of some eternal sophomore, nevertheless, it often costs his associates money. For those of us who somehow escaped the privilege of expressing our desire for education under the elms at New Haven and instead were confined in our quest after *Veritas* to a certain notorious brick-walled backyard on the banks of the Charles River in Cambridge, I must admit that all too often the football season depletes our financial resources and supplements significantly Mr. Lovejoy's annual stipend from the Company.

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Following college and after four years of fruitful experience in the street called "Wall" with the Guaranty Company of New York, in May of 1932, Mr. Lovejoy decided to follow in the footsteps of his illustrious father, and joined The Manhattan Life Insurance Company. Progressing rapidly upward through the posts of Treasurer, Vice-President and Treasurer, and First Vice-

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It happens to be my personal good fortune to chair and to sit on several corporate directorates. Out of my own experience, then, I can testify emphatically that the Company you are honoring this evening possesses an unusually high morale, a very considerable happiness in its leadership, and a sense of pride in its material progress over the long years. Naturally, the voices of the members of the Board of Directors of Manhattan Life are various. But under the skillful wielding of the batons of our two conducting maestros, Messrs. Fordyce and Lovejoy, the members of the Board really play as one because they feel as one. Individual talents, abilities, and temperaments blend in a union of intent and performance that produces a harmonious rendition of a musical score of progress that is pleasing to the ear.

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The two men most responsible for the accomplishments of this Company are seated here at the head table tonight. I count it a fortunate privilege to have the honor now, without further ado, of introducing one of these gentlemen to you, the guest speaker of the evening. I have not read his manuscript. I do not know what he proposes to say. Hence, I will join you all in listening intently. If at any point, perchance, his contemplations go beyond our ken, then, I invite you to join me in recalling his philosophical academic background and in bringing back into your minds the old rhyme that goes: "If this young man talks in terms too deep for me, why, what a very deep young man this deep young man must be!

Mr. Thomas E. Lovejov, Jr., President, The Manhattan Life Insurance Company.



CHRISTOPHER Y. WEMPLE
FIRST SECRETARY AND FIRST POLICYHOLDER

My fellow members of Newcomen:

our presence here tonight does great honor to the Life Insurance business as well as to The Manhattan Life Insurance Company. I feel greatly honored to have been invited by you, Mr. Chairman, to tell The Manhattan Life's story, and I am grateful and proud of the opportunity.

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The story of The Manhattan Life is a story of the coordinated efforts of many fine hard working people, who have conducted the affairs of the Company over the years with integrity and skill, so that the Company has now served the public with distinction for III years. During the III years there have been five major wars, if we include Korea, and four major depressions or panics.

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Back in 1850 a group of thirty prominent New York City citizens banded together to organize The Manhattan Life. Among this group were Caleb S. Woodhull, Mayor of the City of New

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These men were indeed a public spirited group interested in encouraging thrift among their fellow citizens of New York, for in the same year, 1850, they also organized The Manhattan Savings Institution, which later changed its name to The Manhattan Savings Bank.

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This group held its first meeting, I suppose we might call it their organization meeting, in the office of Mayor Woodhull on June 12, 1850, a few days after the Attorney General of the State had issued a certificate stating that he had examined the Company's Charter, and that he found it in accordance with the provisions of the Act of 1849 providing for the incorporation of Insurance Companies. At that meeting Alonzo A. Alvord was elected first President of the Company. A portrait of Mr. Alvord hangs in our Board Room, and his stern face looks down upon us as we deliberate on Company affairs.

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A few weeks later suitable office space was found at 108 Broadway, at the corner of Pine Street and Broadway, and on August 1, 1850 the Company opened its doors for business. On that day Christopher Y. Wemple, Secretary of the Company, became the first policyholder and Policy Number 1 for \$2,000.00 was issued on his life. This policy was in the Company's possession until the summer of 1950 when, at the time of celebrating our one hundredth anniversary, we turned it over to the Museum of the City of New York as a historical document for their collection.

During the early years of the Company the entire organization, other than the Board, consisted of Mr. Alvord, the President, Mr. Wemple, the Secretary, and one paid clerk, Jacob L. Halsey. Mr. Halsey's salary was \$50 per month. There is no record of a salary being paid to Mr. Alvord or Mr. Wemple as the Company's business got under way. However in the beginning Mr. Wemple appears to have been the Company's only salesman, and he received commissions as compensation.

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Mr. Halsey's family is another family which was associated with The Manhattan Life for many years. Jacob L. Halsey served the Company for fifty-five years and retired because of health in 1905. His son Harvey Halsey died in 1937 having also been with The Manhattan Life for fifty-five years. I remember well Harvey Halsey's booming voice and hearty laughter.

Yes, Messrs. Alvord and Wemple were very sales minded and the Company's 1850 sales literature offered a much wider choice of policy types than one would expect from a recently organized Company with no actuary to guide them. The following policies were available: Ordinary Life, Single Premium Life, Endowment at 50, Endowment at 60, Joint Lives and Annuities.

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At your places at the table we placed a facsimile of the front and back covers of the Company's first sales literature. This was a booklet containing 48 pages. In addition to furnishing the premium rates on the policies just mentioned, the booklet enumerated in quaint and colorful language the reasons for buying Life Insurance and also contained a copy of the Company's Charter.

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The sales literature also described the scope of the Company's Medical Examiner's duties in the following manner: "The Medical Examiner of the Company examines as to the rate of pulse, etc., and states his opinion as to the soundness of the party." One wonders how thorough were the examinations made in those days.

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From the beginning the subject of special risks received careful attention and much business was written to cover persons visiting foreign countries or living in the South or traveling to or living in California. The Atlantic Ocean was considered much less of a hazard than a trip to California over land for the insured were permitted to cross the Atlantic in first class ocean steamers without extra charge. Dueling came in for early attention, and one who fell in a duel was not covered by his policy.

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We believe it is quite possible that The Manhattan Life, among all the United States Life Insurance Companies in existence today, was the first to write Accident and Accidental Death Insurance. At the December 10, 1850 Board meeting the Chairman of the Committee on Applications reported "The organization of the accident and accidental death business, which this Company has adopted in affecting insurance of the former with the Franklin, whereby it was conclusively shown they had profited by their experience and if successful in getting business, the Company must realize large profits." The Benjamin Franklin Life Insurance Company, the only company which appears to have preceded The Manhattan Life in the accident field, reinsured in the United States Life in 1870. We were unable to find any records showing how much accident and accidental death business was written.

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Not much time was wasted in developing a sales organization, not only locally, but throughout the Country. The first policy on a resident of Texas was issued on February 19, 1851 to a notary

public in Galveston. I have been told by the Insurance Commissioner of Texas that The Manhattan Life has been doing business without interruption in Texas longer than any other Legal Reserve Company in the Country.

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When the Robertson law was enacted by the Texas Legislature in 1907 requiring out of state Life Insurance companies to invest their reserves on Texas citizens' lives in Texas securities, many of the Eastern Companies withdrew from Texas and did not re-enter Texas for many years. The Manhattan Life had so much of its business and such a good sales organization in Texas, we couldn't afford to withdraw, and we soon found the Robertson law was not hard to live with.

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Our first policy on a California resident was issued on February 28, 1851 to a San Francisco merchant. Not long thereafter we were issuing policies on residents of the Middle West and even Hawaii.

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On January 25, 1851 the policy register showed that there were 174 policies outstanding with the amount of risk totaling \$357,-250.00. The First Annual Report, carrying that date, states there were "no losses and no bad securities." Assets were \$113,332.95.

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The first death claim occurred on July 8, 1851. A check for \$2,000.00 was paid to the widow of William Gaines, a Cincinnati carpenter. The second claim, also in the amount of \$2,000.00, was paid to Mrs. Ezra N. Ball, wife of a Boston printer, in November, 1851. There were no more claims during 1851, so total losses through death amounted to only \$4,000.00 from August 1, 1850, when the Company first opened its door, until January 1, 1852. At the end of 1851 the Company showed Insurance in Force of \$1,900,345.00 and Assets of \$140,778.97. There were fourteen new and aggressive agencies appointed outside of New York City.

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The Manhattan Life assumed one-fourth of the total risk, or \$21,000, for a premium of \$840.00. The balance of the risk was reinsured with four other companies. The Howard Life assumed 25 per cent, Etna of Hartford 25 per cent, Knickerbocker Life 12½ per cent and New England Life 12½ per cent.

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Actually 720 coolies were shipped by the Sea Witch, which incidentally still holds the China to New York record for sailing ships. Within twenty-four hours after sailing, three of the Panamabound coolies jumped overboard and were lost. During the sixty-five day voyage eleven other coolies died of sundry diseases according to the doctor's report, dated March 31, 1854 in the City of Panama. On April 29, 1854, The Manhattan Life paid \$408.00, one-fourth of the total loss, and consequently made \$432.00 on this transaction.

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This Group Policy Number 2645 and dated February 22, 1854, was exhibited at the Panama Pacific Exposition held in San Francisco in 1915. In the summer of 1950, when the Company celebrated its one hundredth anniversary this policy was also donated

to the Museum of the City of New York for their collection of historical documents.

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At the August 14, 1860 meeting of the Board of Directors, Nathan D. Morgan, who became President in 1854, summarized the Company's progress since its start in 1850. I quote a few paragraphs from this report. "During the ten years risks to the amount of \$20,200,671 have been taken by the Company. Its receipts have been \$2,106,158.56.

"The Company has paid to widows and orphans and other claimants the sum of \$526,988 in cash. It has declared in dividends to the insured in the amount of \$340,000, of which sum a large proportion has been paid and cancelled.

"Its assets amount to \$977,626.93."

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There was cause to have satisfaction in the vast expanded field force which on August 1, 1850 consisted only of the energetic Christopher Y. Wemple, Secretary of the Company. By the end of 1860 The Manhattan Life field agents numbered 464, of whom 214 were in New York State, and the balance scattered in points as far removed as California and Texas.

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November 10, 1863 stands out as an important date in the history of The Manhattan Life for the question of introducing an incontestable clause in the Company's policies came up for consideration. This contemplated feature had been referred by President Henry Stokes, who became President of the Company in 1861, to the Application Committee for consideration. When on November 10, 1863 a resolution was presented to the Board of Directors calling for incontestability, it was discussed and laid on the table for further consideration. At subsequent meetings the subject was debated and finally at a meeting on March 8, 1864 the Board approved the adoption of the following resolution: "Resolved, that after a policy issued by this Company shall have been in force five years, the right to void or contest the same for errors, omis-

sions, or misstatements, in the application, except as to age, on which said policy was issued, is hereby waived and relinquished."

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Although the incontestable clause had been used by Life Companies in England for a number of years, this was the first time that any Company in the United States had introduced an incontestable clause in its policies.

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For the benefit of those here tonight who are not familiar with the technical language of the Life Insurance business, the provision in a life insurance policy referred to as the incontestable clause is a provision that even though an applicant may have withheld information on his medical history, or may have withheld any other pertinent information that would have affected the underwriting of his policy, such misstatement or withheld information will be disregarded and the claim will still be paid if death occurs after a specific period of time. Back in 1864 the incontestable period was for five years. Today the standard incontestable period used throughout the Life Insurance business is two years.

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The incontestable privilege when it was approved by the Board in 1864 was automatically applied to all existing policies even though the policies did not contain such provisions. Orlando H. Wilcox of Oswego, New York was issued the first Manhattan Life policy containing the incontestable clause in the policy form.

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The Civil War created many problems. Not only did the Company have the problem of what to do about its policyholders in the North who entered the military service, but many of its policyholders also were in the South. Adequate steps were taken to protect the Company so far as the Northern policyholders were concerned, a temporary extra premium being charged those who entered military service. But many of the Southern policyholders found themselves in the position that they could not even keep up

their policies. They were unable to transfer money to pay the premiums over the battle lines to keep their policies in force. There were death claims, too. Legally the policies were lapsed or cancelled because there had been no payment of premiums.

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When the Civil War ended The Manhattan Life decided to take a liberal non-legal view of the whole difficult situation of Southern policyholders and to pay all claims minus the amount of unpaid premiums. Also every effort was used to help those policyholders still living to reinstate their policies. This proved to be a very wise decision. As Manhattan Life representatives went through the South after the War trying to locate the Southern policyholders and were paying claims, word spread about what The Manhattan Life was doing, and The Manhattan Life soon became known as "The Old Reliable." This term often appeared in policyholders' correspondence to General Agents and the Home Office as late as the early 1900s. Unfortunately the records are incomplete and it is impossible today to determine the exact amount of money paid out in death claim settlements throughout the Post War South. During this period agencies were reopened throughout the South and we soon had representatives in Richmond and Norfolk, Atlanta and Savannah, New Orleans, Mobile, Galveston, Dallas and Louisville.

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At the end of 1870 the Annual Report showed total Assets of \$6,924,116.39 and total receipts during the year of \$2,276,171.71. For some reason the Report did not show the amount of business in force at that time.

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After opening its office at 108 Broadway on August 1, 1850 the Company moved its headquarters three times prior to 1892. In the Spring of 1852 the Company was approached by the Metropolitan Bank with an offer to buy out its lease, which expired May 1, 1853, for \$2,750.00, provided possession could be given by May 1, 1852. Apparently this \$2,750.00 looked pretty good to

the Board of Directors for they snapped up the offer. The May 11, 1852 Board meeting was held in the Company's new quarters at 146 Broadway, corner of Liberty Street. In October 1856 the Company moved its Home Office quarters to 31 Nassau Street, the first "fireproof" building in New York City. Opposite the Post Office, these up-to-date quarters relieved the office congestion resulting from the growth of the office staff at 146 Broadway. In March 1865 the Company moved its Home Office to 156-158 Broadway, between Maiden Lane and Liberty Street. The Company remained at this location for nearly thirty years, and had as fellow tenants and near neighbors several other life and fire insurance companies.

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In April 1892 President Henry B. Stokes, son of Henry Stokes, who became President in 1890, announced that, "The Company were now in possession of the premises Nos. 64 to 68 Broadway and 17 and 19 New Street, New York, and it was necessary to take immediate action as to the improvement of the property." In August of that year the Company accepted the design and plans of the Architectural firm, Kimball & Thompson, and contracts were immediately entered into for the construction of the first skyscraper of New York City. The plans for the twenty-six-story building provided for the caisson type of foundation which involved resting the steel girders of the foundation on the bed rock fifty-five feet below Broadway. This would render The Manhattan Life building entirely independent of any new buildings which might be erected or of any of the tunnels which might be built in the future in the close vicinity of The Manhattan Life property. As this was the first building in New York to have this type of foundation there was considerable resistance to its use by the owners of neighboring buildings. It was only after the most eloquent persuasion on the part of George Kramer Thompson, one of the architects, that the Commissioner of Buildings consented.

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As the building was being constructed, there was considerable comment in the papers and in magazines, and as the steel girders were brought to the site of the property, they created considerable interest. A magazine of the period gives this description of the arrival of the first giant girder at the building site:

"The first of the twelve twenty-two-ton steel cantilever girders for The Manhattan Life's great building, which is to be the tallest office structure in the United States, arrived in Jersey City on September 2, 1893. It was ferried across the North River and transported to the building site. Every street through which the gigantic girder was transported was blocked, and the Broadway cable cars were held up for three-quarters of an hour while sixteen horses exerted every muscle and two hydraulic jacks were tried to their utmost.

"This cantilever girder is sixty-eight feet long by seven and one-half feet wide, and was constructed by the A. P. Roberts Iron Construction Company of Philadelphia. A mammoth girder of thirty-nine tons weight has been built by the same company and will be used in the construction of the building. Fifty horses were necessary to drag this mass of iron."

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The finished building, known as 66 Broadway, rose 347 feet above Broadway and 400 feet above the base of the foundation. It required twelve months and twenty days to complete, and fortunately no lives were lost during its construction. An artesian well, 1,056 feet deep, supplied water for the entire building and had a potential maximum daily output of 100,000 gallons.

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Enough steel was put into the building to construct 100 miles of railroad, an insurance publication noted. Saint Paul's in London was six feet higher than New York's first skyscraper at 66 Broadway, but there was no higher structure in the United States, according to a published tabulation of tall buildings in 1893. In those days the building was one of the musts for sight-seers, as the Empire State building is today. Guides were available to take visitors through the building including the part occupied in the tower by the Government weather station. The building still stands and is now known as 70 Broadway and is now occupied by the Manufacturers

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On the sixth floor of the building, outside of the President's office, there was a balcony overlooking Broadway. I remember very clearly standing on that balcony in 1927 and watching the ticker tape parade for Charles A. Lindbergh when he returned to New York after his historical flight across the Atlantic Ocean to Paris.

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The Board Room on the sixth floor was finished in Santo Domingo mahogany and furnished with elegant furniture of the period. In our Board Room on 57th Street we are still using the same chairs and other furniture which were purchased back in 1893 for the Board Room. I am still using a desk which was purchased for the President of the Company then. I might say it is not one of the old fashioned roll top desks. It is quite modern in basic design and although a bit on the heavy side, it is quite practical.

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The building was completed in August 1893 and the total cost of construction exclusive of land was \$1,744,670.00.

August 1, 1900 witnessed the completion of fifty years of Manhattan Life's history. Still attached to the pages covering the August 15, 1900 minutes of the Board is a typewritten sheet headed, "The following is a statement for the first six months of 1900." It shows total income for the first six months of the year as \$1,333,804.88 and a total amount at risk on June 30th of \$58,200,208.24.

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At the turn of the century many unsound practices had crept into the Life Insurance business. The companies were paying higher and higher first year commissions when competing for business and engaged in other questionable practices. Such practices eventually led to the Armstrong Investigation in 1905. Charles Evans Hughes was Counsel of the Committee, and he waited until December 29, 1905, the next to the last day of the Hearings, to call Mr. Stokes, President of The Manhattan Life. Mr. Stokes' testimony was relatively brief, and the *Brooklyn Citizen* reported that "His (Mr. Stokes') testimony made an excellent impression. According to his statements the officers accepted no rebates on insurance and were members of no underwriting syndicates. The Company paid no money for political campaigns or legislative work. Mr. Stokes said that the Company had not been a member of any underwriting syndicates."

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Several weeks later, Leslie's Weekly said: "The Manhattan Life is one of the companies that came through the insurance investigation unscathed. Beyond a doubt, that investigation has led many conservative persons to seek insurance in the smaller, rather than the larger companies. The Manhattan Life was organized in 1850 and is one of the oldest of the old-line companies. It is well officered, and its expenses are very much less than those of many of its competitors, while its surplus is large and growing."

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In the January 11, 1906 issue *The Spectator* commented on The Manhattan Life as follows: "During the course of recent legislative investigation it developed on the stand that the Company was not a participant in syndicate transactions, had no Wall Street affiliations, had made no political contributions, and was entirely exempt from questionable methods of business operation."

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In May, 1913, the Board elected my father as President. He was quite a remarkable man. At the time of his election he was thirty-seven years of age and had considerable experience in banking and investments.

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Following the war the far-flung influenza epidemic of 1918 was of particular importance to the life insurance business. Mortality, of course, is one of the factors entering into the calculation of premiums for insurance. The heavy influenza mortality, on top of the normal losses, threw this factor way out of line. For instance The Manhattan Life's mortality experience that year was the heaviest in the Company's history. However it was able to continue the writing of new insurance without the necessity of any unusual restrictions.

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In 1926 the time had come for the Company to change its Home Office. It had been at 66 Broadway for over thirty years, and it was with great reluctance that the Company moved from New York's first skyscraper. The building was sold and finally became the main office of the then Central Hanover Bank. The Manhattan Life was among the first of the financial institutions to move uptown from the Wall Street district. We occupied space in a new office building at 654 Madison Avenue, corner of 60th Street, for ten years.

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In 1936 The Manhattan Life moved to 120 West 57th Street, a building we acquired at the time of the sale of 66 Broadway. It was necessary to make extensive alterations in order to have the building suitable for our occupancy. We stayed at this location for twenty-one years.

By the middle 1950s we realized we would soon have to move. Due to our growth we were so crowded that our operations were undoubtedly becoming inefficient. In the Spring of 1958 we purchased the Steinway Building right across the street at 111 West 57th Street, and leased back to Steinway & Sons, on a long term lease, the ground floor and other space in the building. They are good tenants we think. Due to rent control it took us sometime to get possession of space which we then had to alter for our use. This took about a year, and in the Spring of 1959 we moved over to 111 West 57th Street. We are quite happy with our modern quarters, and have plenty of room for future expansion. Every square foot of space we are not using for ourselves is rented to tenants.

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October 29, 1929 was the day of the great stock market crash. Thus began the long drawn out depression of the 1930s which profoundly affected the entire economic structure of this Country. The Manhattan Life during the early days of the depression was not only able to conduct its own affairs satisfactorily, but was able to assist another Life Insurance company in meeting its cash requirements by taking over some of its mortgages. Also the Company's growth continued without interruption until the end of 1930 at which time its total insurance in force passed the \$101 million mark, an all-time high up to this point. In April 1932 The Manhattan Life reinsured the business on the books of the Guaranty Life Insurance Company of New York.

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However, the terrific slump in general business conditions began in time to affect the Life Insurance business. The Manhattan Life, like other Life Insurance companies, experienced an upward zoom in policy loans, a decline in sales of new business, an increase in terminations, as well as a decrease in the value of real estate securing mortgages and a decrease in the value of other investments. Like other companies we had our problems, but I am glad to say we were able to find solutions and lay the foundations to build on.

It is very interesting that during this period of the depression of the 1930s, there came to the Company a group of men who are mainly responsible for the growth we have had since 1937. Our present Chairman, Mr. J. P. Fordyce, joined the Company as Director of Agencies on December 11, 1934. In 1935 Elder A. Porter, our Vice-President and Chief Actuary, joined the Company, and a few years later D. Theodore Kelly joined the Company as Vice-President, later becoming Vice-President and General Counsel. I think I joined the Company in May of 1932 and admittedly was the young member of this group, and I question if I made much contribution in the early years. However I learned as much as I could as rapidly as I could.

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When my father passed away in December, 1939, Mr. Fordyce was elected President. Under Mr. Fordyce's leadership our field organization was reorganized, new policies adopted, and in due course the Company began to grow. The problems of the 1930s became a bad dream, and we devoted our time, thoughts and energies in planning and working for the future. Mr. Fordyce is a man of integrity, keen intelligence, and has deep understanding of our human failings. I've learned a lot from him, and feel that I am fortunate to have him as a friend.

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On January 1, 1940 The Manhattan Life had \$77,000,000 of insurance in force and total admitted assets of \$21,689,809.

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Shortly after Mr. Fordyce's election as President came the Second World War. The Company made available as in previous wars, war risk coverage for those in military service for an extra premium. As in previous wars this extra premium would be used only so far as necessary to meet losses resulting from military service. As I recall it our experience was such that we refunded the entire amount of extra premiums paid when the war was over.

In an effort to aid in the prosecution of the War, the Board of Directors at a special meeting on December 23, 1941 passed a resolution to the effect that The Manhattan Life would use an amount equal to all its renewal premiums to purchase Government securities for the duration of hostilities. We were the first Company to take such action, and the announcement of this action received wide publicity as the Associated Press, United Press and other services carried the news to newspapers throughout the Country. The Company received many telegrams and letters of commendation from the Treasurer of the United States and the Governor of each State where we were licensed to do business. On V-J Day The Manhattan Life had 43.8 per cent of its assets invested in Government securities. In addition Home Office employees were directly responsible for the sale of over \$11 million of War and Victory bonds.

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When the War was over the Company invited war veterans to apply for a refund of unearned premiums on policies containing double indemnity and total disability waiver of premium clauses as such clauses were inoperative during their service in the war. Nearly 700 war veterans took advantage of this offer.

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On August 1, 1950 The Manhattan Life celebrated its 100th anniversary. We published a history of the Company and gave a dinner at the Waldorf for the occasion. Many leaders of the Industry were our guests at that dinner.

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On December 31, 1950 we had \$253,000,000 of business in force, and assets amounted to \$60,861,000.

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As of December 31, 1956 The Manhattan Life reinsured the business of The Expressmen's Mutual Life Insurance Company. This brought to us approximately 48,000 additional policyholders and approximately \$51,000,000 of business in force. In addition it

brought to us many fine men and women on the staff who have adapted themselves so well that I feel as if they had always been with The Manhattan Life. It was a real loss to us when Mr. Leon O. Head, formerly President of The Expressmen's Mutual, and then Vice-President of The Manhattan Life, passed away earlier this year.

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The 1950s were a period of expansion for The Manhattan Life, expansion in many ways. First we entered the Group Life Field in 1950. We now have over \$700,000,000 of Group in force, and I might add our Group operation has been quite profitable. Also we expanded our territory, and are now licensed to do business in forty-nine states and the District of Columbia. We plan to apply for admission to that fiftieth state in the next year or so. The remaining phase of our expansion in the last ten years, and by no means the least important, has been the expansion of our field force. As we entered new states, we would appoint new General Agents. We now have over 100 General Agencies, and I would hesitate to estimate how many thousands of agents we have under contract.

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At the end of 1960 we had \$1,523,846,000 of business in force and total assets of \$178,635,000.

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The expansion of our business could not have been accomplished without the help of many people. In addition to the four already mentioned, Messrs. Fordyce, Porter, Kelly and yours truly, I could name many others. After the war, Ralph Schaberg, our Vice-President & Secretary, returned from the Service. Shortly thereafter Frank Finan, Vice-President & Treasurer, and Jack Murray, Vice-President of Group returned. It was also about that time that Wendell Buck, our Public Relations Counsel returned from the Service. In 1951 Dr. L. Gordon LaPointe, our Vice-President and Medical Director, joined us, and three years later Fred Lohm, our Vice-President and Director of Agencies, joined us. Everyone of these men, in his field, has made a substantial contribution to our expansion and growth since 1950.

We are very fortunate in having a Board of Directors who have given us their support and confidence. They have been most generous with their time and counsel. Without that support this expansion could not have taken place.

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I would also like to say that we are fortunate in having the kind of men we have in the New York State Insurance Department. Devoted public servants, many of them have made themselves available for consultation and advice when we felt we needed it. That has helped, I can assure you.

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The Life Insurance business is a fascinating business. It has many facets all of which are interesting. When The Manhattan Life opened shop in 1850 for \$1.15 you could buy a coal hod, shovel, poker and candlesticks, according to the Cash Journal at the Home Office. How times have changed!

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Since the Second World War there have been a lot of changes in the Life Insurance business also. I have the impression that the average layman looks upon the Life Insurance business as a staid, ultra-conservative business with little changes. I can assure you that is not the case. Since the Second World War there has been a tremendous growth in the Group business and Pension Trust business of the Life Insurance companies. New ideas, new types of contracts such as the Family Plan policy have been developed. You will be interested to know that The Manhattan Life came out with the first such policy in New York State. We beat the Prudential by a few months, and I believe with our Family Rider we have the best contract on the market.

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Yes, as I have said, the Life Insurance business is a fascinating and dynamic business and is more complicated than it ever was. Today there are over 1,400 companies throughout the Country

competing for business. Back in 1850 my guess is there were a baker's dozen. However if the Life Insurance business didn't perform a service to the public there would be no justification for it, and we at Manhattan Life are very conscious of the service factor and of our trusteeship. There are many in our organization who have absorbed that philosophy, and I expect when this team of Fordyce, Porter, Kelly and Lovejoy are no longer active in the management of the Company, that the same principles and policies will be followed.

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A large part of the research material in this paper on The Manhattan Life was taken from the history of the Company which I mentioned was prepared in connection with our one hundredth anniversary celebration in 1950. That history was written by our Public Relations Counsel, Wendell Buck. My conscience would not permit me to let this occasion pass without expressing my appreciation to Wendell for the spade work he inadvertently did for me.

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You have been very patient in letting me tell you The Manhattan Life's story, and I hope you have found it interesting. Thank you for being here.

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"Actorum Memores simul affectamus Agenda!"



NEW YORK'S FIRST SKYSCRAPER—66 BROADWAY
BUILT BY THE MANHATTAN LIFE

This Newcomen Address, dealing with the history of The Manhattan Life Insurance Company, was delivered at a National Newcomen Dinner of The Newcomen Society in North America, held at New York, N.Y., U.S.A., on November 15, 1961. Mr. Lovejoy, the guest of honor, was introduced by G. Rowland Collins, Dean Emeritus, Graduate School of Business Administration, New York University; Member of the New York Committee, in American Newcomen. The dinner was presided over by the Senior Vice-President For North America, in this

international Society.

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THE NEWCOMEN SOCIETY in North America

NAPRIL, 1923, the late L. F. Loree (1858-1940) of New York, then dean of American railroad presidents, established a group now known as "American Newcomen" and interested in Material History, as distinguished from political history. Its objectives center in the beginnings, growth, development, contributions, and influence of Industry, Transportation, Communication, the Utilities, Mining, Agriculture, Banking, Finance, Economics, Insurance, Education, Invention, and the Law—these and correlated historical fields. In short, the background of those factors which have contributed or are contributing to the progress of Mankind.

The Newcomen Society in North America is a non-profit membership corporation chartered in 1961 under the Charitable Law of the State of Maine, with headquarters on North Ship Road, Uwchlan Township, Chester County, Pennsylvania, some five miles east of Downington, Pennsylvania, and 32 miles west of the City of Philadelphia. Here also is located The Thomas Newcomen Memorial Library in Business History, a reference collection, including microfilm, open to the public for research and dealing with the subjects to which the Society devotes attention.

Meetings are held throughout the United States of America and across Canada at which Newcomen Addresses are presented by leaders in their respective fields. These manuscripts represent a broadest coverage of phases of Material History involved, both American and Canadian.

The approach in most cases has been a life-story of corporate organizations, interpreted through the ambitions, the successes and failures, and the ultimate achievements of those pioneers whose efforts laid the foundations of the particular enterprise.

The Society's name perpetuates the life and work of Thomas Newcomen (1663-1729), the British pioneer, whose valuable contributions in improvements to the newly invented Steam Engine brought him lasting fame in the field of the Mechanic Arts. The Newcomen Engines, whose period of use was from 1712 to 1775, paved a way for the Industrial Revolution. Newcomen's inventive genius preceded by more than 50 years the brilliant work in Steam by the world-famous James Watt.

The Newcomen Society in North America is affiliated with The Newcomen Society for the Study of the History of Engineering and Technology, with offices at The Science Museum, South Kensington, London, S.W. 7, England. The Society is also associated in union with the Royal Society for the Encouragement of Arts, Manufactures and Commerce, whose offices are at 6 John Adam Street, London, W.C. 2, England.

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Members of American Newcomen, when in Europe, are invited by the Dartmouth Newcomen Association to visit the home of Thomas Newcomen at Dartmouth in South Devonshire, England, where the festival of "Newcomen Day" is celebrated each year on the fourth Friday in July.

1095 Avenue of the Americas New York, NY 10036 Tel 212-578-0399 rdilorenzo@metlife.com

Robert F. DiLorenzo Assistant Vice President Regulatory Affairs

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DEC 1 9 2011

MARYLAND INSURANCE ADMINISTRATION **MetLife**®

December 13, 2011

The Honorable Terese M. Goldsmith Insurance Commissioner Maryland Insurance Administration 200 St. Paul Place. Suite 2700 Baltimore, MD 21202

Attn: Tinna Demaso Quigley

Re: COMAR 31.16.09 – Registry and Report on Slavery Era Insurance Regulations

MetLife Group - NAIC Group Number 01241

Life Insurance Companies – NAIC Number
Metropolitan Life Insurance Company - 65978
MetLife Insurance Company of Connecticut - 87726
MetLife Investors USA Insurance Company - 61050
MetLife Investors Insurance Company - 93513
New England Life Insurance Company - 91626
Metropolitan Tower Life Insurance Company - 97136
General American Life Insurance Company - 63665

Property and Casualty Insurance Companies Economy Fire & Casualty Insurance Company - 22926 Economy Premier Assurance Company - 40649 Economy Preferred Insurance Company - 38067 Metropolitan Property and Casualty - 26298 Metropolitan Casualty Insurance Company - 40169 Metropolitan Direct Property and Casualty Insurance Company - 25321 Metropolitan General Insurance Company - 39950 Metropolitan Group Property and Casualty Insurance Company - 34339

Dear Ms. Demaso Quigley:

The following is MetLife's report on slavery era insurance as required under COMAR 31.16.09. As previously reported verbally by Michael Hickey of MetLife's Government

Relations department, MetLife has determined that none of its life insurance companies or property and casualty companies provided insurance of any kind on slaves.

For purposes of this report, the Metropolitan Life Insurance Company is the lead reporting company.

MetLife has conducted an extensive review of its records in connection with various regulatory and other matters and found no evidence that any of its companies had at any time provided insurance coverage on slaves.

Metropolitan Life was founded in New York on March 24,1868. Given the date and state of its founding, it is extremely unlikely that Metropolitan Life could have issued policies to slaveholders for death or damage of their slaves. Moreover, to respond to Supplement No. 1 to Circular Letter 19 (2000) issued by the New York Insurance Department ("the circular letter"), Metropolitan Life conducted an extensive examination of its records concerning historic underwriting practices. This examination included reviews of materials in the corporate archives, corporate biographies, rate books and other materials concerning the early history of the Company. This review uncovered no indication that Metropolitan Life issued policies to slaveholders for death or damage of their slaves.

In 1996, Metropolitan Life merged with The New England Mutual Life Insurance Company ("New England Mutual"). New England Mutual was founded in Boston in 1835. In preparing its response to the Circular Letter, employees at the New England Life Insurance head office (the former New England Mutual home office) formed a working group that included New England Life's Vice-President for New Business, its corporate archivist, and members of the Law Department. The working group examined or reviewed available documents concerning historic underwriting practices, including Home Office Bulletins dating back as early as 1913, summaries of minutes of Board of Directors meetings, notices and circulars to field agents dating back to 1866, and A Capital Ship, New England Mutual's 1985 corporate biography. Additionally, the corporate archivist reviewed the archive's collection. This extensive review uncovered no indication that New England Mutual had issued policies to slaveholders for death or damage of their slaves.

New England Life Insurance Company (which Metropolitan Life acquired in its 1996 merger with New England Mutual), and General American Life Insurance Company (which MetLife acquired in 2000), were each incorporated in the 20th Century. Moreover, we have found no evidence that any of these companies had a predecessor company in existence prior to the 20th Century. Because these companies could not have issued policies to slaveholders for death or damage of their slaves, these companies did not need to conduct a search for such policies. Moreover, reviews were conducted at all three companies to respond to requests from insurance regulators concerning any race-conscious underwriting practices. These reviews confirmed the lack of any information indicating that the companies issued policies to slaveowners.

MetLife Investors Life Insurance Company, formerly Cova Financial Services Life Insurance Company, was acquired by MetLife in connection with its acquisition of

General American. MetLife Investors USA, formerly Security First Life Insurance Company, was acquired by MetLife as part of separate transaction. MetLife subsequently renamed the companies. However, these insurers and their predecessor companies also all came into existence in the second half of the 20th Century and could not have issued policies on slaves.

The life insurance companies Travelers Insurance Company and Travelers Life and Annuity Company (Travelers) were acquired by MetLife in 2005, subsequently merged and renamed MetLife Insurance Company of Connecticut. MetLife did not acquire historical Travelers material in connection with the 2005 transaction; however, available information indicates that Travelers began as a life company in 1864, making it unlikely that it ever insured slaves.

All of the above listed property and casualty insurance companies (including acquired companies) were formed in the 20th century. Metropolitan Property and Casualty Insurance Company was incorporated in 1972 ("Met P&C"). In 1999, Met P&C acquired Economy Fire & Casualty Company, Economy Preferred Insurance Company, and Economy Premier Assurance Company from St. Paul Fire and Marine Insurance Company. These companies were incorporated in 1935, 1979, and 1980, respectively.

Metropolitan Casualty Insurance Company was incorporated in 1981. Metropolitan Direct Property and Casualty Insurance Company ("Met Direct") was incorporated as The Great South Insurance Company in 1949. Before its acquisition by Met P&C in 1986, the entity now known as Met Direct acquired its subsidiary, Progressive Fire Insurance Company of Atlanta, in 1958. Progressive Fire Insurance Company of Atlanta was incorporated in 1943.

Metropolitan General Insurance Company was incorporated in 1980. Metropolitan Group Property and Casualty Insurance Company was formed in 1976, initially as Metropolitan Reinsurance Company.

Each of the referenced property and casualty insurance companies were incorporated too recently to have been involved in issuing policies to slaveowners and thus these companies also did not need to conduct a search for such policies.

We trust that the above provides the Maryland Insurance Administration with the necessary level of assurance that the MetLife companies have not issued or acquired any policies or insurance coverage on the lives of slaves at any time. Please feel free to contact the undersigned if you have any questions.

Very truly yours, Robert Dilorenze

Robert F. DiLorenzo

Middlesex Insurance Company 1800 North Point Drive P.O. Box 8020 Stevens Point, WI 54481-8020 Maria Mansavage Corporate Compliance Specialist II

maria.mansavage@sentry.com

715 346-7951 715 346-8943 Fax



June 21, 2011

MARYLAND INSURANCE ADMINISTRATION SLAVERY ERA INSURANCE REGISTERY 200 ST PAUL PLACE SUITE 2700 BALTIMORE MD 21202

Re: Report of Middlesex Insurance Company Slaveholder Insurance Policies

This letter is in response to COMAR 31.16.09.04 regarding the slaveholder insurance policy report. The information provided is true and not misleading, containing the most accurate information available to date.

(1) <u>Insurer Identification</u>

Company Name: Middlesex Insurance Company

Address: 1800 North Point Drive

Stevens Point, WI 54481

Phone Number: 715-346-6000

Fax Number: 715-346-8943

E-mail Address: Compliance @sentry.com

NAIC Number: 23434

Website URL: http://www.sentry.com

(2) Contact Person

Wendy Whitrock Director of Privacy and Compliance Sentry Insurance 1800 North Point Drive Stevens Point, WI 54481

Phone Number: 715-346-6383 Fax Number: 715-346-8943

E-mail: wendy.whitrock@sentry.com

SINCE 1904

(3)Research Methodology

While Middlesex Insurance Company was established in 1826, it was purchased by the Sentry Insurance Group in 1974. Based upon our research, we did not find that Middlesex Insurance Company sold any slaveholder insurance policies as defined in Insurance Article, § 30-101, Annotated Code of Maryland.

(a) and (b) The company's historical records, which are maintained by the parent company's librarian staff, were researched. In searching the archival records we do have, we were unable to find any slaveholder insurance policies as defined in Insurance Article, § 30-101, Annotated Code of Maryland.

(4) Responsive Data

Based upon our research, Middlesex Insurance Company has no responsive date to report.

Certified and affirmed under oath by:

William M. O'Reilly\Secretary Middlesex Insurance Company

Subscribed and sworn to before me this 21st day of June, 2011.

Wendy S. Whitrock, Notary Public State of Wisconsin

My Commission Expires 06/07/2015.





July 13, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202 JUL 1 8 2011

Maryland Insurance
Administration

RE:

Slave Era Policies

To Whom It May Concern:

Per the Code of Maryland Regulations 31.16.09, we submit the following:

(1) Insurer Identification -

Name:

Middlesex Mutual Assurance Company

Address:

213 Court Street, Middletown, CT 06457

Telephone:

(860) 347-4621

Fax:

(860) 638-5231

Email:

lpotts@ilfb.org

NAIC:

14532

Website URL: www.middleoak.com

(2) Contact Person -

Name:

Linda B. Potts

Title:

Assistant General Counsel

Address:

1701 Towanda Avenue, Bloomington, IL 61701

Telephone:

(309) 557-2193

Fax:

(309) 557-2096

Email:

lpotts@ilfb.org

(3) Research Methodology -

Middlesex Mutual Assurance Company was not admitted to the State of Maryland to write insurance until July 1, 2001. Our company was charted in Connecticut in 1836 for the purpose of writing fire insurance, and we have no records to indicate that we ever wrote any slave era polices.

Attached is a copy of a handwritten copy of our original charter, which indicates that we were organized in order to provide fire insurance. We have our original charter, however, it was too fragile to make a copy of the original document.

For your information, there was only one Negro slave living in Middlesex County, Connecticut in 1840. In 1848, slavery was forbidden by the Connecticut Legislature. Supporting documentation is attached.

(4) No Responsive Data -

Based on the fact that Middlesex Mutual Assurance was not admitted to the State of Maryland to write insurance until July 1, 2001, and that our research shows that Middlesex never issued a slave policy at any time in any state, the company does not possess any data responsive to this report.

I, Barbara A. Baurer, President & Vice Chairman of Middlesex Mutual Assurance Company hereby certifies and affirms under oath that to the best of my knowledge, the foregoing is true and not misleading and contains the most accurate information available at the time of submission.

Dated this 13 day of July, 2011 in the City of Bloomington, State of Illinois.

Barbara A. Baurer

President & Vice Chairman

Middlesex Mutual Assurance Company

Centennial 1836-1936

A brief account of the more significant events in the history of the County of Middlesex and of the growth of the Middlesex Mutual Assurance Company

MIDDLETOWN, CONNECTICUT

1936

Copyright 1936 by
The Middlesex Muttial Assurance Company
Middletown, Connecticut

Designed & Printed

at the Sign of the Stone Book

by

The Case, Lockwood & Beatmand Company

Hartford, Connecticut

Second, facsimile, printing: 1973

ritinction encompassed only 74 years, ending in 1848, when elevery was forbidden by the Legitlature.

During the slavery period, which began first with the sale of Indian captives after the Pequot War, with more Indians added at the close of King Philip's War in 1675, most Connecticut masters treated their slaves kindly, permitting them to occupy a corner of the church gallery on Sundays. Although they had no legal control over their slaves, their claims were almost always fespected. The Indian slaves were generally an indolent lot, described by President Dwight of Yale as having too little enterprise to steal anything of importance." This laziness served them well, for they were rapidly released until the last Indian slaves were freed in the 1690's.

Connection may look with pride upon its slavery record. For 50 years before the rise of the Abolitionians both masters and the Legislature were cooperating effectively toward its curtailment and final abolishment. In fact there were but 25 slaves recorded in the state when the Abolitionists, about 1830, began their energetic campaign to end negro bondage. The highest number of negro slaves recorded in Middlesex County was 208 in 1790, declining to 1 by 1840—a record to which every son of Middlesex may point with justifiable pride.

Middletown has excelled in war as well as in peace, sacrificing of her brave sons in all wars since the destruction of the Pequots in 1636. Outstanding service was rendered in the Revolutionary War by Captain Return Jonathan Meigs who marched his fully equipped company to Boston as soon as word was received of the Battle of Lexington. In the next month (May 1771) Samuel Holden Parsons and a number of others sided

Copy of the Certified Copy of the Charter, Mina a to.

General assumbly

May, Jession 1836-

In corporating the Maddlesex Multial
Assurance Company
Upon the petition of Horah a Phelps,
Richard Sous said, Henry Caringan, Charles
Wordward, and famuel Coop or all residing
with County of Middlesex, in said State, and
others, their associates who staits of said
County, showing to this assembly that there
is not at the present time any Fire Insurance
Company established within said County
and praying for the incorporation of the
Minter Fire assurance Company as per
petition on file dated april 15. 1836.

SEC! Perolised by this assembly, that the aforesaid persons, and all others who may become members or associates with them as herein after puricled, and their successors for ever be and they are turchy creating ordanied, constituted and declared to be a body corporate and politice for the purpose of effecting insurance against lose or damage to fire, by the name and style of the middlesse, multing, assurance, Company, and by that

name are, and for ever hereafted shall be capable in law to have, hold, but chase, vective, possess Engage and retain To them's Elves. and their pricessors, lands Few enecuts, hereditaments, souts, goods chaticles and effects of what kind or nature sowed, and the pame to grant, sell, denise, alien and dispose of, and by that name to pur and to pured, plead and be impleaded, answering be answered unto, defend and beldefended, in all brists of record, or any other place or places whatsower, and also to have and use a comme seaf, and the pame to change and allet at their pleasure, deso to ordain, Establish, and put in Execution all puch by laws rules and regula time as shall be necessary and convenicut for the good government of said torporation and the people man ageneut of the concerns thereof, not Hring contrary to the laws of this feate or the united states; and guerally To do and Execute, all puch acto, whatters and things as to them may or shall apportain.

Copy of Charter and amendments as certified by See of Stock Fit. 1888. for deposit with Ins. bona. of Mars.

The amendment of Amil1867 or to tier should who rejected by the Company on the rest pay.



SEP 2 3 2011

Maryland Insurance Administration H. Stacey Boyer Vice President, General Counsel & Secretary

MONUMENTAL LIFE INSURANCE CO.

Administrative Office: 2 East Chase Street Baltimore, MD 21202 Telephone: 410-347-8632 Fax: 410-576-4554 Hboyer@monlife.com www.monlife.com/ml

September 21, 2011

Therese M. Goldsmith Insurance Commissioner Maryland Insurance Administration 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202

Re: Slavery Era Report

Dear Commissioner Goldsmith;

Enclosed is the Slavery Era Report required under COMAR 31.16.09.03 for Monumental Life Insurance Company and its affiliates. If you have any questions, please contact me directly.

Sincerely, H Stacey Bogu



4333 Edgewood Road NE Cedar Rapids, IA 52499 Telephone 319-355-8511

September 12, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202

RE: Registry & Report on Slavery Era Insurance

Dear Sirs;

Pursuant to Maryland Bulletin 11-15 and COMAR 31.16.09.03, this consolidated report is being filed by Monumental Life Insurance Company ("Monumental Life") on behalf of itself and its affiliated insurance companies, namely: Stonebridge Casualty Insurance Company, Stonebridge Life Insurance Company, Transamerica Advisors Life Insurance Company, Transamerica Advisors Life Insurance Company, Transamerica Financial Life Insurance Company, Transamerica Life Insurance Company, and Western Reserve Life Assurance Co. of Ohio.

Monumental Life is the reporting insurer. As such, we provide the following identifying information:

Home Address: Monumental Life Insurance Company 4333 Edgewood Road, NE Cedar Rapids, IA 52499 Telephone Number: 319-355-8511

Administrative Offices:

2 East Chase Street, Baltimore, Maryland 21202

Telephone Number: 410-347-8632

NAIC #468-66281

Website URL: www.monlife.com/ml

Fax number: 319-355-2206

E-mail address: shcorporatelaw@aegonusa.com

The contact person for Monumental Life Insurance Company will be:

H. Stacey Boyer, Vice President, Division General Counsel & Secretary 2 East Chase Street, Baltimore, Maryland 21202

Telephone number: 410-347-8632

Fax number: 410-576-4554

E-mail address: Stacey.Boyer@Transamerica.com

We have conducted research of the corporate records of Monumental Life and its affiliated insurance companies using the company database which contains incorporation dates, along with other pertinent information. No insurance company or any predecessor company was found to be in existence during the Slavery Era, with the exception of Monumental Life Insurance Company which was incorporated in 1858.

Research of the policy records for Monumental Life Insurance Company has found no record of slaveholder insurance policies having been issued during the Slavery Era. The research was performed as follows:

Beginning in 2000 as the result of a market conduct examination performed by the Maryland Insurance Administration, Monumental Life conducted an extensive review of its policy plans and the history of the companies it had acquired to determine if any policies had been written using different premiums for African-Americans than for other races. In addition, research of Monumental Life's archives in preparation for a book celebrating Monumental Life's 150th anniversary in 2008 revealed that the Company only wrote policies on lives in a limited geographical area, namely only in the Baltimore area, during the years 1858 to 1860 and then suspended sales of all insurance until 1865. During the course of both research projects, Monumental Life did not locate any slaveholder insurance policies issued during the Slavery Era.

I hereby certify and affirm under oath that the foregoing statements are true and correct, do not intend to be misleading and contain the most accurate information available at the time of the submission of this report.

Brenda K. Clancy, President

Maryland Slavery Era Insurance Information AEGON companies Slavery Era Slaveholder Insurance Policy Status

Definitions:

[&]quot;Slaveholder insurance policy" means a policy issued to or for the benefit of a slaveholder (as defined in MIC 30-101) to insure the slaveholder against injury to a slave or the death of a slave.

Reporting Insurer	Incorporated Date		List Predecessor Insurers That Existed Prior to 1865 (or state "None")	Did Insurer or Any Predecessor Insurer Ever Issue a Slaveholder Insurance Policy? (Yes or No)
Monumental Life Insurance Company	3/5/1858	Yes	Chartered 3/5/1858 as Maryland Mutual Life and Fire Insurance Company. 1870-changed name to Mutual Life Insurance Company of Baltimore. 1935-changed name to Monumental Life Insurance Company.	No
Stonebridge Casualty Insurance	11/15/1957	No	None	No
Company Stonebridge Life Insurance Company	11/19/1900	No	None	No
Transamerica Advisors Life Insurance Company	1/27/1986	No	None	No
Transamerica Advisors Life Insurance Company of New York	11/28/1973	No. Not authorized in Maryland.	None	No
Transamerica Financial Life Insurance Company	10/3/1947	No	None	No
Transamerica Life Insurance Company	4/19/1961	No	None	No
Western Reserve Life Assurance Co. of Ohio	5/14/1979	No	None	No

[&]quot;Insurer" includes each person engaged as indemnitor, surety, or contractor in the business of entering into insurance contracts.

[&]quot;Predecessor insurer" means an insurer associated with the reporting insurer that existed prior in time to the reporting insurer.

[&]quot;Slavery Era" means years prior to 1865.



MONY Life Insurance Company MONY Life Insurance Company of America

1290 Avenue of the Americas New York NY 10104

Rosa G. Iturbides, Vice President Law Department Telephone No.: 212-314-3893 Fax No.: 212-707-7973

E-Mail: rosa, iturbides@axa-financial.com

September 30, 2011

VIA FEDERAL EXPRESS

Ms. Brenda Wilson, Associate Commissioner, Life and Health Maryland Insurance Administration 200 Saint Paul Place, Suite 2700 Baltimore, MD 21202

Re: Slavery Era Insurance Registry Report
MONY Life Insurance Company – NAIC No. 66370

Dear Ms. Wilson:

Pursuant to Title 30 - Registry and Report on Slavery Era of Maryland Insurance Code, MONY Life Insurance Company took the actions required by Sections 30-101 <u>et seq.</u> and is hereby filing the Slavery Era Insurance Policies Registry Report.

1. <u>Insurer Identification – Reporting Insurer</u>

Company Name: MONY Life Insurance Company

Address: 1290 Avenue of the Americas, New York, NY 10104

Telephone: 212-314-3893

Fax: 212-707-7973

E-Mail: rosa.iturbides@axa-equitable.com

NAIC Code 66370

Website: www.mony.com

2. Contact Person

Name: Rosa G. Iturbides

Address: MONY Life Insurance Company

1290 Avenue of the Americas, 12th Floor, New York, NY 10104

Telephone: 212-314-3893

Fax: 212-707-7973

E-Mail: rosa.iturbides@axa-equitable.com

3. Research Methodology

MONY has reviewed its historical and policy records from the slavery era, as defined in the Maryland Code, and we have found no indication that MONY's predecessor company, The Mutual Life Insurance Company of New York, underwrote or issued life insurance policies insuring the lives of slaves. All policy records currently maintained by the company for policies issued during the slavery era were recorded on "Policy Out of Force" cards, which listed the policy

Ms. Brenda Wilson September 30, 2011 Page 2

number and the date that the policy went out of force. Neither the name of the insured nor any other policy information is indicated on those cards. The only other records maintained by the company which could possibly relate to policies issued during the slavery era are payment vouchers, which we have only maintained since 1925. Furthermore, although the payment vouchers stated the names of the insured and the payee, they did not request information which could indicate any potential slaveholder-slave relationship among the parties to the contract. As such, we cannot ascertain from our slavery era records that any slaveholder-slave relationship existed among the policyholder, insured or beneficiary of any policy that we ever issued.

4. Names of Slaves

Not Applicable

5. Names of Slaveholders

Not Applicable

6. Policy Information

Not Applicable

If you have any questions concerning this report, please contact me.

Very truly yours,

Pase Tours

National Life Insurance Company®



National Life Insurance Company ("NLIC") (NAIC #66680) Group #634 Report on Slavery Era Insurance Policies

Pursuant to the Maryland Insurance Administration Bulletin 11-15; COMAR 31.16.09, National Life Insurance Company conducted a review of its records to determine whether it wrote any slaveholder insurance policies directly or through a predecessor corporation during the slavery era.

Based on the material reviewed, it does not appear that NLIC wrote any slaveholder insurance policies, either directly or indirectly through a predecessor corporation. The basis for this conclusion is set forth below.

1. Insurer Identification

National Life Insurance Company One National Life Drive Montpelier, VT 05604 Telephone: 802-229-3129

FAX: 802-229-3123

Email address: nliccompliance@nationallife.com

NAIC #66680 Group #634

Website: www.nationallifegroup.com

OCT 03 2011

Maryland Insurance Administration

2. Contact Person

Donna Morgan, Chief Compliance Officer National Life Insurance Company One National Life Drive Montpelier, VT 05604 Telephone: 802-229-7308

FAX: 802-229-3123

E-mail address: dmorgan@nationallife.com

3. Research Methodology

NLIC was incorporated in Montpelier, Vermont in 1848 and issued its first policy in 1850. The availability of documents for early periods of the Company's history is very limited. However, a review of the Minutes of the Board of Directors and National Life Insurance Company, A History of its Foundation and Development 1850-1925, (1925), revealed no mention of slaveholders or slaves.

An excerpt from the regulations of the Company from 1850 stated that the only persons the Company was authorized to issue policies to was married men upon their own lives, for the benefit of their wives and children; unmarried females on the lives of their fathers or brothers, for their own benefit; and creditors on the lives of their debtors; or debtors themselves, for the protection of creditors. Therefore, under these regulations, slaveholders would not be allowed to purchase insurance on their slaves. There is no mention of a change in these regulations through 1868 that would have allowed slaveholders to insure their slaves.

In addition, an extensive review was conducted in 2000 pursuant to a report on race-based underwriting to determine whether race-based underwriting ever existed in the history of National Life. The extensive review revealed that it did not appear to have ever engaged in race-based practices and the only mention of race, color, creed or national origin found in the Board of Director Minutes from its inception in 1848 to the present time was a reference in the early 1960s regarding the Company's lack of in-depth mortality data with-regard to noncaucasians and a contemporaneous statement that the underwriting practices for caucasians and noncaucasians were identical. Had slaves been insured during the slavery era, National Life would have had mortality data with regard to noncaucasians.

There was no predecessor corporation to National Life Insurance Company, and it did not acquire or assume any business from any other company during the slavery era.

4. Responsive Data

None. See response to #3 above.

5. Names of slaves

None. See response to #3 above.

6. Names of slaveholders, beneficiary, policyholder, or all of them

None. See response to #3 above

7. Policyholder information

None. See response to #3 above.

Donna Morgan, first being duly sworn, deposes and says that she is Chief Compliance Officer of National Life Insurance Company, the person preparing and filing this paper; that she has read the same and knows the contents thereof and that the contents are true of her own knowledge.

Donna Morgan Chief Compliance Officer

Subscribed and sworn to before me this day of September, 2011.

Notary Public

My commission expires on: $\frac{2/10/15}{}$.

Notary Seal



SEP I 9 2019
Maryland Insurance
Administration

August 30, 2011

RE: COMAR 31.16.09 Registry and Report on Slavery Era Insurance

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202

To the Maryland Insurance Administration:

In accordance with Insurance Article, Title 30, Annotated Code of Maryland, the Registry and Report of Slavery Era Insurance, you will find below our 2011 Slaveholder Insurance Policy Report. This is a Consolidated Report filing, pursuant to COMAR 31.16.09(.03) (B) and (C), which covers the following companies currently licensed in Maryland: Nationwide Mutual Insurance Company on behalf of the affiliates and subsidiaries in Attachment I, related to property and casualty insurance policies; and Nationwide Mutual Insurance Company on behalf of the affiliates and subsidiaries in Attachment II related to life insurance policies (collectively "Nationwide").

Insurer Contact Information:

Nationwide Mutual Insurance Company One West Nationwide Blvd., 1-04-701 Columbus, Ohio 43215-2220 Telephone: (614) 249-1545 Fax number: (866) 315-1430

Email address: FinRpt@nationwide.com Website address: www.nationwide.com

NAIC Group Code 0140

Insurer Contact Person Information:

Arlene Swanson, Director, Accounting One West Nationwide Blvd., 1-04-701 Columbus, Ohio 43215-2220 Direct Telephone (614) 677-6412 Fax number (866) 315-1430 Email address swansoa@nationwide.com

Research Methodology: Nationwide used the following research methodology in generating and preparing this report:

- 1. Records, files, and minute books from Nationwide's corporate offices were reviewed in order to first determine whether any current Nationwide companies were doing business prior to 1865;
- 2. Records, files, and minute books from Nationwide's corporate offices were reviewed in order to determine whether any Nationwide companies were doing business in Maryland prior to 1865;
- 3. Searched all companies via the Global Corporate Manager Database ("GCM");
- 4. Compared the listings of the insurance companies filed in the Form B (Insurance Company Registration Statement);
- 5. Searched the following Secretary of State websites Arizona, California, Iowa, Indiana, Michigan, and Ohio;
- 6. From these searches, it was determined that no Nationwide companies were doing business prior to 1865, except the following:

In November 1994, Covenant Life Insurance Company (formerly Presbyterian Ministers' Fund) was merged into Provident Mutual. Presbyterian Ministers' Fund was chartered in 1759 as "The Corporation for the Relief of Poor and Distressed Widows and Children of Presbyterian Ministers" ("Corporation"). As the name suggests, in the early years the Corporation provided annuities to

widows and children of covered deceased ministers. According to our research, in 1852 the Corporation broadened its market to include all Presbyterian-governed bodies. At that time, only 55 ministers were insured and three plans were being offered:

- a. annuity for widows and children;
- b. an ordinary life policy (for an amount not to exceed \$3,000);
- c. a minister's retirement annuity.

Results: No current Nationwide affiliate or subsidiary included in Attachment I was in existence prior to 1865, therefore Nationwide has found no responsive data with regard to property and casualty insurance policies. Additionally, no current Nationwide affiliate or subsidiary included in Attachment II was in existence prior to 1865, except for Presbyterian Ministers' Fund through Provident Mutual. As stated above, our research has revealed no indication that Presbyterian Ministers' Fund issued insurance policies to slaveholders to cover damage to or death of their slaves. Therefore, we believe we have no further reporting requirements relative to the Maryland Insurance Code and Regulations.

Sincerely,

rephen S. Rasmussen

CEO, Nationwide Mutual Insurance Company



ATTACHMENT I

Companies included in the Nationwide Insurance Group, # 0140

Nationwide Affinity Insurance Company of America NAIC # 26093

Nationwide Assurance Company NAIC # 10723

Allied Insurance Company of America (fka: Atlantic Floridian Insurance Company)

NAIC # 10127

Colonial County Mutual Insurance Company NAIC # 29262

Crestbrook Insurance Company NAIC # 18961

Nationwide Mutual Fire Insurance Company NAIC # 23779

Nationwide Mutual Insurance Company NAIC # 23787

Nationwide General Insurance Company NAIC # 23760

Nationwide Insurance Company of Florida NAIC # 10948

Nationwide Indemnity Company NAIC #10070

Nationwide Lloyds NAIC # 42110

Nationwide Property & Casualty Insurance Company NAIC # 37877

Freedom Specialty Insurance Company NAIC # 22209

National Casualty Company NAIC # 11991

Scottsdale Indemnity Company NAIC # 15580

Scottsdale Insurance Company NAIC # 41297

Scottsdale Surplus Lines Insurance Company NAIC # 10672

Western Heritage Insurance Company NAIC # 37150

Titan Indemnity Company NAIC # 13242

Titan Insurance Company NAIC # 36269

Victoria Automobile Insurance Company NAIC # 10644

Victoria Fire & Casualty Company NAIC # 42889

Victoria National Insurance Company NAIC # 10778

Victoria Select Insurance Company NAIC # 10105

Victoria Specialty Insurance Company NAIC # 10777

Nationwide Agribusiness Insurance Company NAIC # 28223

Farmland Mutual Insurance Company NAIC # 13838

Allied Property & Casualty Insurance Company NAIC # 42579

AMCO Insurance Company NAIC # 19100

Depositors Insurance Company NAIC # 42587

Nationwide Insurance Company of America NAIC # 25453

ATTACHMENT II

Companies included in the Nationwide Insurance Group, # 0140

Nationwide Life Insurance Company NAIC # 66869 Nationwide Life and Annuity Insurance Company NAIC # 92657



Certification Statement

I, Stephen S. Rasmussen, certify and affirm under oath that the report herein is true and not misleading; and contains the most accurate information available at the time of the submission of the report.

Stephen Rasmussen, CEO Nationwide Mutual Insurance Company

State of Ohio County of Franklin

Subscribed and sworn before me a Notary Public in and for the aforesaid jurisdiction, by Stephen Rasmussen, CEO of Nationwide Mutual Insurance Company this Mth day of September 2011.

Diana Adams (Notary Public)



Diana Adams Notary Public, State of Ohio My Commission Expires 06-22-2016



APR 1 2 2012

Maryland Insurance Administration

New York Life Insurance Company 1 Rockwood Road, Sleepy Hollow, NY 10591

Bus: (914) 846-3620 Fax: (914) 846-4613

E-mail: boneill@newyorklife.com

www.newyorklife.com

Brian M. O'Neill First Vice President and **Deputy General Counsel**

April 10, 2012

VIA E-MAIL AND **UPS**

Ms. Nancy J. Egan Maryland Insurance Administration Assistant Director Government Relations 200 St. Paul Place Baltimore, MD 21202

Slavery Era Insurance Information Report Re:

Dear Ms. Egan:

In accordance with the standards for reporting slavery era insurance information pursuant to Insurance Article, Title 30, Annotated Code of Maryland, the following constitutes the consolidated report of New York Life Insurance Company ("New York Life") and its wholly owned subsidiaries New York Life Insurance and Annuity Corporation ("NYLIAC"; NAIC #91596) and NYLIFE Insurance Company of Arizona ("NYLAZ"; NAIC #81353).

New York Life Insurance Company is submitting this consolidated report:

Address:

New York Life Insurance Company

51 Madison Avenue New York, N.Y. 10010

Telephone Number: (914) 846-3620

Fax Number:

(914) 846-4613

E-mail address:

nylweb@newyorklife.com

NAIC number:

66915

Website URL:

www.newyorklife.com

Ms. Nancy J. Egan April 10, 2012 Page 2

New York Life Contact Person:

Brian M. O'Neill First Vice President and Deputy General Counsel

Address:

New York Life Insurance Company

1 Rockwood Road

Sleepy Hollow, N.Y. 10591

Telephone Number: (914) 846-3620

Fax Number:

(914) 846-4613

E-mail address:

boneill@newyorklife.com

Research Methodology and Conclusions

New York Life's predecessor, the Nautilus Insurance Company ("Nautilus"), began writing life insurance policies in 1845. In 2000 – 2001 New York Life undertook an extensive review of Nautilus' slavery era archival records, including published histories of the company, Policy Registers, Index of Applicants and Death Claim Book. New York Life retained outside professional archivists to assist with this research effort. The research was conducted at New York Life's facilities. We found no information that Nautilus had issued any slaveholder insurance policies in Maryland. Accordingly, New York Life has no information to report.

NYLIAC and NYLAZ were formed in 1980 and 1987, respectively, and neither company had a predecessor corporation. Neither company ever acquired any slavery era insurance policies. As such, those companies have no information to report.

Please let me know if anything additional is required.

Burn h. O'Wall

Very truly yours,

Brian M. O'Neill

Ms. Nancy J. Egan April 10, 2012 Page 3

AFFIRMATION UNDER OATH

State of New York}
County of Westchester}

Brian M. O'Neill, First Vice President and Deputy General Counsel of New York Life Insurance Company, being duly sworn, deposes and says that, to the best of his information, knowledge and belief, the above Report is true and complete and not misleading and contains the most accurate information available at the time of its submission.

Brian M. O'Neill

First Vice President and Deputy General Counsel Subscribed and sworn to before me this 10th day of April 2012

Notary Public

RICHARD P. BOWWAN
Notary Public, State of New York
No 01B05056775
Qualified in New York County
Commission Expires 5/3/2014

From:

"Brian M. O'Neill/NYLIC" <Brian_M_O'Neill@newyorklife.com>

To:

<negan@mdinsurance.state.md.us>

Date:

4/10/2012 1:42 PM

Subject:

Slavery Era Insurance Information

Dear Nancy:

Please accept this as the consolidated report of New York Life Insurance Company ("New York Life"; NAIC # 66915), and its wholly owned subsidiaries, New York Life Insurance and Annuity Corporation ("NYLIAC", NAIC # 91596) and NYLIFE Insurance Company of Arizona ("NYLAZ", NAIC # 81353) pursuant to Title 30 of the Maryland Insurance Code.

NYLIAC and NYLAZ were formed in 1980 and 1987, respectively, and neither company has a predecessor corporation. Neither company ever acquired any slavery era insurance policies. As such, those companies have no information to report.

New York Life's predecessor, the Nautilus Insurance Company ("Nautilus"), began writing life insurance policies in 1845. In 2000 - 2001 New York Life undertook an extensive review of Nautilus' slavery era archival records, including published histories of the company, Policy Registers, Index of Applicants and Death Claim Book. New York Life retained outside professional archivists to assist with this research effort. We found no information that Nautilus had issued any slaveholder insurance policies in Maryland. Accordingly, New York Life has no information to report.

We apologize for the delay in submitting this response. Please let me know if you require anything further on this.

Brian M. O'Neill First Vice President & Deputy General Counsel New York Life Insurance Company 1 Rockwood Road Sleepy Hollow, NY 10591 (914) 846-3620



August 23, 2011

JUL 2 6 2011

Maryland Insurance Administration

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place, Suite 2700 Baltimore, MD 21202

To the Commissioner of Insurance:

CONSOLIDATED REPORT REGARDING SLAVEHOLDER INSURANCE POLICIES filed by THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY as reporting insurer for itself and on behalf of its subsidiary NORTHWESTERN LONG TERM CARE INSURANCE COMPANY

Company name: The Northwestern Mutual Life Insurance Company

Address: 720 E. Wisconsin Avenue, Milwaukee, WI 53202

Telephone number: 414-271-1444

Fax number: 414-665-5712

E-mail address: there is no general unassigned email address NAIC number: 860-67091; http://www.northwesternmutual.com/

Contact person: David K. Nelson

Title of contact person: Assistant General Counsel, Law Department

Address: 720 E. Wisconsin Avenue, Milwaukee, WI 53202

Telephone number: 414-665-7356

Fax number: 414-665-1532

E-mail address: davidknelson@northwesternmutual.com

Company name: Northwestern Long Term Care Insurance Company

Address: 720 E. Wisconsin Avenue, Milwaukee, WI 53202

Telephone number: 414-271-1444

Fax number: 414-665-5712

E-mail address: there is no general unassigned email address

NAIC number: 860-69000; http://www.northwesternmutual.com/about-northwestern-mutual/our-company/northwestern-mutual-subsidiaries/northwestern-long-term-care-insurance-company.aspx

Maryland Insurance Administration August 23, 2011 Page 2

Contact person: David K. Nelson

Title of contact person: Assistant General Counsel, Law Department

Address: 720 E. Wisconsin Avenue, Milwaukee, WI 53202

Telephone number: 414-665-7356

Fax number: 414-665-1532

E-mail address: davidknelson@northwesternmutual.com

REPORT

Northwestern Long Term Care Insurance Company ("NLTC") is a wholly owned subsidiary of The Northwestern Mutual Life Insurance Company. The entity that is now NLTC did not exist prior to 1865, having been initially organized in 1953 as Poulson Insurance Company of America. In 1969, the company was renamed Standard of America Life Insurance Company. In 1982, The Northwestern Mutual Life Insurance Company bought Standard of American Life Insurance Company and in 1997, the company was renamed Northwestern Long Term Care Insurance Company. NLTC only sells individual long-term care insurance, and has done so since 1998.

Accordingly, there is no NLTC slavery era insurance policy data to report.

REPORT

The Northwestern Mutual Life Insurance Company ("the Company") was formed in 1857 in Wisconsin and thus did business during the "slavery era."

Research Methodology

Nothing in the Company's existing historical files or in a history of the Company published by Northwestern University Press in 1957 ("Northwestern Mutual Life, a Century of Trusteeship," Harold Williamson & Orange A. Smalley) suggests that the Company issued insurance to slaveowners for the death or loss of their slaves. There is no reference to slaves or slaveholders in any historical documents dating from the slavery era or thereafter, or in the Company history. All available evidence and the clearest inferences to be drawn from that evidence lead to the firm conclusion that no such insurance was issued by the Company.

The following describes the research which supports our assertion that this Company has no data to report to the Department.

1. Geographic Limitations. At no time during the slavery era did the Company do business in any slaveholding state. For most of the slavery era the Company did business only in Wisconsin, Minnesota, and Iowa, all non-slavery states. By the end of 1865, the Company also did business in Massachusetts, Illinois, Indiana, Michigan, Nebraska, Kansas, Ohio, and Pennsylvania; again, all non-slavery states. Only

Maryland Insurance Administration August 23, 2011 Page 3

after the end of the Slavery Era, in 1866, did the Company do business in a former slave-holding state. It is deemed unlikely that slaveholders in a position to purchase insurance on slaves would have resided in the states this Company did business in during 1857-1865. No slave would have resided in a state where the Company did business during the slavery era.

- 2. Limited Product Line. From 1857 to 1968, when a line of disability income insurance was introduced, the Company sold only individual life insurance and annuities. For most of the slavery era the Company sold just one plan of life insurance, at one set of rates, and by the end of the slavery era (during the actual Civil War itself), the Company sold three types of life or endowment insurance plans, all fully underwritten and all issued at standard premium rates. This Company has never sold property, casualty, indemnity, or surplus lines insurance, which are the varieties of insurance products generally described as being issued to slaveholders to insure them against injury or loss of slaves. Our understanding is that traditional life insurance was not the product used to insure slaveholders against the death of slaves. If it was used, it was presumably not the same life insurance product, at the same premiums, and underwritten in the same manner, as was sold to the general marketplace, but presumably a product with provisions and premiums tailored to the situation, including the mortality experience of slaves. Until 1956, Northwestern Mutual issued its life insurance only at standard rates, and thus did not have any specially priced life insurance product during the slavery era.
- 3. Policy Provisions. During the slavery era, the Company's life insurance policies recited that they were contracts made with the insureds. The printed policy form used during the slavery era, after defining the life at risk as "the assured," recited that the Company did "promise and agree to and with the said assured, well and truly to pay, or cause to be paid, the said sum assured, to said assured, {his} executors, administrators or assigns" Thus, under the policy forms used by the Company during the slavery era, a policy was the property of, and issued to, the life at risk. A special form of contract would have been needed to show a slaveholder as being the policyholder, with the slave as the life at risk. No such special contract has been found to have existed.
- 4. Underwriting Restrictions and Coverage Exclusions. During the slavery era, for reasons related to the medical risks of diseases associated with humid and warm climates, such as Yellow Fever, policies issued by this Company had exclusion provisions under which no claim would be paid if the insured, without the Company's consent, passed into "between the 1st of July and the 1st of November those parts which lie south of the southern boundaries of the states of Virginia and Kentucky or shall be or reside within ten miles of the Mississippi or Missouri Rivers between the parallels of 36 degrees 30 minutes and 40 degrees of north latitude (except while journeying) ..." Thus the policies themselves would have normally excluded insuring all persons residing in primary slave-holding areas. The Company also refused to issue insurance to persons deemed to have hazardous occupations or to reside in what were at that time considered to be unhealthy areas of the country, by which was meant, then and into the early twentieth century, much of the deep South. The Company's 1859 "Instructions for the Government of the Agents and Physicians," which were in effect for the slavery era, recite that the examining physician was to record a thorough health history for the proposed insured, including a

Maryland Insurance Administration August 23, 2011 Page 4

thorough family history, and to not recommend insurance for those who could not provide satisfactory responses to their questions. There is no provision for special procedures that would be needed to underwrite the lives of slaves. Moreover, there were significant limitations on occupations, including many types of manual labor of the sort historically said to be performed by slaves.

For these reasons, the Company concludes that it did not issue slaveholder insurance policies and has no responsive data to report.

I, John E. Schlifske, being first duly sworn, do certify and affirm that I am the Chairman and Chief Executive Officer of The Northwestern Mutual Life Insurance Company and that these Reports are true and not misleading and contain the most accurate information available as of the date of these Reports.

John E. Schlifske

Chairman and Chief Executive Officer

The Northwestern Mutual Life Insurance Company

STATE OF WISCONSIN

)ss:

COUNTY OF MILWAUKEE)

day of

David K. Nelson

Notary Public

My commission is permanent

Doc. 1943845



AUG 2 5 2011

150 Royall Street Canton, MA 02021 onebeacon.com

Maryland Insurance Administration

Restricted/Confidential

SENT VIA U.S. MAIL August 22, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place – Suite 2700 Baltimore, MD 21202

Re: Registry and Report on Slavery Era Insurance Policies (COMAR 31.16.09)

Dear Ms. Damaso Quigley:

Please find enclosed the response of the OneBeacon Insurance Group (NAIC Group No. 1129) in connection with COMAR 31.16.09 (Slavery Era Insurance Policies Registry).

Insurer Identification:

NAME:	NAIC Number:
OneBeacon America Insurance Company	20621
The Employers' Fire Insurance Company	20648
The Northern Assurance Company of America	38369
Essentia Insurance Company	37915
OneBeacon Insurance Company	21970
Pennsylvania General Insurance Company	21962
The Camden Fire Insurance Association	21946
Homeland Insurance Company of New York (surplus-lines)	34452
Houston General Insurance Company	38849
Traders & General Insurance Company	38857
Atlantic Specialty Insurance Company	27154

MAILING ADDRESS:

150 Royall Street Canton, MA 02021

TELEPHONE NUMBER:

781.332.7000

FAX NUMBER:

781.332.7257

E-MAIL ADDRESS:

www.onebeacon.com

Contact Person:

Bradford W. Rich, President, CEO & General Counsel 150 Royall Street, C2-35 Canton, MA 02021

Ph.: 781.332.7169 Fax: 888.862.8724

E-mail: BRich@onebeacon.com

Research Methodology:

The OneBeacon Group has a centrally managed storage facility for all records maintained internally for the various companies in the group. The executive in charge of the records maintenance facility reviewed all categories of records maintained and found no evidence of policies or other records which predated the 1930's. He believes this is the case because prior to the increase in asbestos, environmental and medical malpractice claims in the 1970's, the companies generally only kept records in compliance with statutory requirements which were in most cases not longer than seven years. With the increase in claims based on older policies in the 1970's, files began to be kept for longer but by that time pre-1930 policy related and other files had been discarded.

The Group also uses a vendor to maintain files off-site. In connection with the Slave Era Insurance Registry inquiry, the vendor surveyed his file record database. As with the internally maintained files, he could find no files predating 1930.

For the reasons stated above, OneBeacon Insurance Group found no data responsive to COMAR 31.16.09

Please feel free to contact me if you have any further questions.

Sincerely,

Jesse McSweeney

BIS Analyst

OneBeacon Insurance Group

Nancy Egan - Re: FW: Slavery Era Registry

From:

Nancy Egan

To:

McCarthy, Virginia A. 4/12/2012 10:14 AM

Date:

4/12/2012 10:14 AM

Subject: Re: FW: Sla

Re: FW: Slavery Era Registry

Thanks Ginny. I appreciate it.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

>>> "McCarthy, Virginia A." <VMcCarthy@OneBeacon.com> 4/12/2012 10:12 AM >>>

Dear Ms. Egan — I am writing to confirm your e-mail to Brad Rich. I will review our files and get back to you as soon as possible with the information requested.

Regards,

Ginny

Virginia A. McCarthy Associate General Counsel & Secretary

OneBeacon Insurance Group

150 Royall Street | Canton, MA 02021

tel: 781.332.7191 | fax: 866.267.2240 | onebeacon.com

From: Nancy Egan [mailto:NEgan@mdinsurance.state.md.us]

Sent: Thursday, April 12, 2012 09:17 AM

To: Rich, Bradford W

Subject: Slavery Era Registry

Dear Mr. Rich,

We received your response on 08/25/2011 to the request for information required by COMAR 31.16.19.03. We are trying to compile some statistics and your response did not indicate if any of the predecessors of the One Beacon and its other responding insurers that they may have acquired were in existence prior to 1865. If you please provide the name of the earlier predecessors of the various companies and the date of earliest existence. If you could let me as soon as possible, I would appreciate it.

Thank you.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

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Thank you.

Nancy Egan - Slavery Era Registry

From:

Nancy Egan

To:

brich@onebeacon.com

Date: Subject:

4/12/2012 9:17 AM Slavery Era Registry

Dear Mr. Rich,

We received your response on 08/25/2011 to the request for information required by COMAR 31.16.19.03. We are trying to compile some statistics and your response did not indicate if any of the predecessors of the One Beacon and its other responding insurers that they may have acquired were in existence prior to 1865. If you please provide the name of the earlier predecessors of the various companies and the date of earliest existence. If you could let me as soon as possible, I would appreciate it.

Thank you.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

Nancy Egan - RE: FW: Slavery Era Registry

From: "McCarthy, Virginia A." < VMcCarthy@OneBeacon.com>

To: 'Nancy Egan' <NEgan@mdinsurance.state.md.us>

Date: 4/20/2012 4:18 PM

Subject: RE: FW: Slavery Era Registry

Nancy – thank you for your patience. Below is an overview of the corporate history of the companies listed in our 8/22/2011 response:

OneBeacon America Insurance Company – organized 3/10/1971 (MA)

- formerly Commercial Union Insurance Company name changed 8/31/2001
- formerly Employers Commercial Union Insurance Company name changed 1/1/1973

The Employers' Fire Insurance Company – organized 1/21/1921 (MA)

The Northern Assurance Company of America – organized 8/21/1987 (MA)

 formerly Commercial Union Property & Casualty Insurance Company – name changed 12/31/1989

Essentia Insurance Company - organized 4/27/1979

 formerly American Central Insurance Company to Essentia Insurance – name changed 9/27/2007

OneBeacon Insurance Company – organized 6/1/1956 (PA)

- formerly CGU Insurance Company name changed 8/28/2001
- formerly General Accident Insurance Company of America name changed 8/25/1999)
- formerly Potomac Insurance Company name changed 2/1/1982
- formerly The American Colonial Insurance Company name changed 12/31/1956

Pennsylvania General Insurance Company - organized 8/15/1955 (PA)

- formerly General Accident Insurance Company name changed 8/28/2001
- formerly Pennsylvania General Insurance Company name changed 8/25/1999

The Camden Fire Insurance Association - organized 3/12/1841 (NJ)

- formerly CGU Insurance Company of New Jersey name changed 9/6/2001
- formerly The Camden Fire Insurance Association name changed 10/22/1999
- originally Camden Mutual Insurance Association name changed 2/18/1881

Homeland Insurance Company of New York - organized 5/11/1988 (NY)

formerly GA Insurance Company of New York - name changed 9/14/2001

Houston General Insurance Company - organized 12/15/1980 (TX)

formerly New HG Insurance Company - name changed 6/17/1981

Traders & General Insurance Company – organized 12/15/1980 (TX)

• formerly Traders Indemnity Company - name changed 1/15/1981

Atlantic Specialty Insurance Company – organized 6/27/1986 (NY)

formerly Atlantic Reinsurance Company - name changed 2/15/1995

Please let me know if you have any questions or need any additional information.

Best regards,

Ginny

Virginia A. McCarthy Associate General Counsel & Secretary

OneBeacon Insurance Group

150 Royall Street | Canton, MA 02021

tel: 781.332.7191 | fax: 866.267.2240 | onebeacon.com

From: Nancy Egan [mailto:NEgan@mdinsurance.state.md.us]

Sent: Thursday, April 19, 2012 10:13 AM

To: McCarthy, Virginia A.

Subject: Re: FW: Slavery Era Registry

Good morning Ginny,

I wanted to check back with you about the information requested. We are trying to submit our report next week and we need to complete all of the loose end.

Thanks.

Nancy

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488 >>> "McCarthy, Virginia A." <VMcCarthy@OneBeacon.com> 4/12/2012 10:12 AM >>>

Dear Ms. Egan — I am writing to confirm your e-mail to Brad Rich. I will review our files and get back to you as soon as possible with the information requested.

Regards,

Ginny

Virginia A. McCarthy Associate General Counsel & Secretary

OneBeacon Insurance Group

150 Royall Street | Canton, MA 02021

tel: 781.332.7191 | fax: 866.267.2240 | onebeacon.com

From: Nancy Egan [mailto:NEgan@mdinsurance.state.md.us]

Sent: Thursday, April 12, 2012 09:17 AM

To: Rich, Bradford W

Subject: Slavery Era Registry

Dear Mr. Rich,

We received your response on 08/25/2011 to the request for information required by COMAR 31.16.19.03. We are trying to compile some statistics and your response did not indicate if any of the predecessors of the One Beacon and its other responding insurers that they may have acquired were in existence prior to 1865. If you please provide the name of the earlier predecessors of the various companies and the date of earliest existence. If you could let me as soon as possible, I would appreciate it.

Thank you.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

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Thank you.



SEP 1 9 2011 Maryland Insurance Administration **Eileen C. McDonnell**President
Chief Executive Officer

September 16, 2011

Maryland Insurance Administration Slave Era Insurance Registry 200 St. Paul Place Suite 2700 Baltimore, MD 21202

Re: Slave Era Insurance Policy Registry and Report

Dear Sirs and Madams:

This letter constitutes the consolidated report of The Penn Mutual Life Insurance Company and its wholly-owned subsidiary, The Penn Insurance and Annuity Company, pursuant to COMAR 31.16.09. The Penn Mutual Life Insurance Company, as parent, is designated as the reporting insurer.

I certify and affirm under oath that the following report is true and not misleading, and contains the most accurate information available at the time of submission of the report.

 The insurer making the report is The Penn Mutual Life Insurance Company, main office address 600 Dresher Road, Horsham, PA 19044, telephone 215-956-8000, fax 215-956-8347, e-mail address pmlweb@pennmutual.com, NAIC number 67644, website URL www.pennmutual.com.

This report includes The Penn Insurance and Annuity Company, main office address 600 Dresher Road, Horsham, PA 19044, telephone 215-956-7754, fax 215-956-8347, e-mail address pmlweb@pennmutual.com, NAIC number 93262, website URL www.pennmutual.com.

2. The Contact Person is Franklin L. Best, Jr., Vice President, General Counsel, Insurance Operations, and Corporate Secretary, The Penn Mutual Life Insurance Company, 600 Dresher Road, Horsham, PA 19044, telephone 215-956-7754, fax number 215-956-7750, e-mail address best.frank@pennmutual.com.

- 3. The methods employed to identify and compile the records and information that are responsive to the Act were as follows. The record retention policy of The Penn Mutual Life Insurance Company, which also applies to records of The Penn Insurance and Annuity Company, provides for destruction of policy issue records 10 years after policy termination. All policies issued during the slave era terminated more than 10 years ago. Patricia Sofield, the manager in charge of record retention, and her successors, Suzanne Sturn and Marcia DeLong, have confirmed that no record of a policy issued by either company exists from the slavery era. A search was made of the Penn Mutual policy data base, which includes the inventory system at Iron Mountain, its off-premises site. The oldest policies were identified and the records reviewed. The historical archives were searched and yielded no documents regarding insurance policies issued by either company to slaveholders.
- 4. No record of any policy issued by The Penn Mutual Life Insurance Company, or any affiliate, or any predecessor corporation, to any slaveholder that provided coverage for damage to or death of a slave, was found.
- 5. Not applicable.
- 6. Not applicable.
- 7. Not applicable.

Sincerely.

Eileen C. McDonnell

President and Chief Executive Officer

Affirmed before me this 16th day of September, 2011

Womm & 13 eath Notary Public COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Donna L. Beath, Notary Public Horsham Twp., Montgomery County My Commission Expires May 4, 2015

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Nancy Egan - RE: Slavery Era Registry and Report

From: "Best, Frank" < Best.Frank@pennmutual.com>

Nancy Egan <NEgan@mdinsurance.state.md.us>

Date: 4/6/2012 2:07 PM

To:

Subject: RE: Slavery Era Registry and Report

CC: "Best, Frank" <Best.Frank@pennmutual.com>

The Penn Mutual Life Insurance Company was chartered by an Act of the Assembly of the Commonwealth of Pennsylvania approved February 24, 1847.

Penn Insurance and Annuity Company was incorporated July 3, 1980, and commenced business April 9, 1981.

Neither company has a predecessor company.

Frank Best
Vice President, General Counsel, Insurance Operations and Corporate Secretary
Penn Mutual Life Insurance Company
600 Dresher Road Horsham, PA 19044
215-956-7754
215-956-7750 (fax)

From: Nancy Egan [mailto:NEgan@mdinsurance.state.md.us]

Sent: Friday, April 06, 2012 1:57 PM

To: Best, Frank

Subject: Slavery Era Registry and Report

Dear Mr. Best,

The MD. Insurance Administration received your company's response on 09/19/2011. We are trying compile some statistical information based on the responses. Your report indicates that Penn Mutual or Penn Insurance & Annuity Co were in existence during the slavery era. Could you provide the either date of existence of either of the two companies or if applicable, the name of the predecessor company and its date of existence?

Your prompt response is appreciated.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488

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Nancy Egan - Slavery Era Registry and Report

From:

Nancy Egan

To:

best.frank@pennmutual.com

Date:

4/6/2012 1:56 PM

Subject: Slavery Era Registry and Report

Dear Mr. Best,

The MD. Insurance Administration received your company's response on 09/19/2011. We are trying compile some statistical information based on the responses. Your report indicates that Penn Mutual or Penn Insurance & Annuity Co were in existence during the slavery era. Could you provide the either date of existence of either of the two companies or if applicable, the name of the predecessor company and its date of existence?

Your prompt response is appreciated.

Nancy J. Egan Assistant Director Government Relations 200 St. Paul Place Baltimore Md 21202 410-468-2488



SEP 27 2011

Maryland Insurance
Administration

Robin K. Sage Corporate Compliance Manager Travelers Corporate Compliance

(860) 954-6144 (800) 733-3192 (fax)

rksage@travelers.com

One Tower Square, 5MSB Hartford, CT 06183

September 22, 2011

Tinna Damaso Quigley,
Director of Government Relations
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, Maryland 21202

Dear Ms. Quigley:

Pursuant to COMAR 31.16.19, I am filing herein the Report on Slavery Era Policies issued by any of the insurers owned or managed by The Travelers Companies, Inc. A list of such insurers is attached to this letter as well as the Certification signed and affirmed under oath by Brian MacLean, the Chief Executive Officer of The Travelers Companies, Inc.

(1) The filing entity of this report is:

The Travelers Indemnity Company, NAIC #25658

One Tower Square

Hartford, Connecticut 06183

Telephone: 860-277-1111

Fax: 800-733-3192

Email: rksage@travelers.com

URL: Travelers.com

(2) The contact person filing this report is:

Robin K. Sage, Compliance Manager Travelers One Tower Square, MS05B Hartford, Connecticut 06183

Telephone: 860-954-6144

Fax: 800-733-3192

Email: rksage@travelers.com

(3) We reviewed the archives of the subsidiaries of The Travelers Company, Inc. to determine what, if any, policies these companies may have written providing coverage for slaves. A variety of historical documents were reviewed, including loss books, policy books and financial record books from the Slavery Era for those companies transacting business during that time. We also examined the company newsletters, advertising materials and minute books. Based upon corporate records that we were able to locate from the Slavery Era (prior to 1865), we found no evidence that any subsidiaries issued any policies to slaveholders that provided coverage for slaves. While The Travelers Insurance Company (a former subsidiary) was incorporated in 1863, it did no business in southern states until after the Civil War. The Traveler Indemnity Company of Connecticut (incorporated in 1859) did business in southern states during the Slavery Era, but corporate records from that period make no reference to coverage for slaves. Additionally, The St. Paul Fire and Marine Insurance Company was established in Minnesota on March 2, 1853. Corporate records were reviewed by the company archivist who discovered that from the time of its creation until after the Civil War, all policies were written in Minnesota which at the time prohibited such policies. Slavery was illegal in the Northwest Territory established by Congress in 1787 and remained illegal when Minnesota was granted statehood in 1857.

Similar diligent searches have been conducted at other locations where corporate records are stored. We found no evidence that any company within The Travelers Companies, Inc. issued policies providing coverage for slaves.

- (4) The Travelers Indemnity Company and its affiliates have no responsive data.
- (5) The names of slaves: none.
- (6) The names of slaveholders: none.
- (7) The policy information: none.

This report is being submitted in duplicate as required by Subsection C of COMAR 31.16.09.04.

There is no data found for the sections of the reports outlined in Subsections B(5), (6) and (7) and therefore there is no information submitted electronically.

Should you require any additional information or clarification, please feel free to contact me at (860) 954-6144.

Sincerely,

Robin K. Sage

Robin K. Sage

Attachments

COMPANIES LICENSED IN MARYLAND FOR PROPERTY & CASUALTY

INSURER	NAIC NUMBER
American Equity Insurance Company (a Surplus Lines company)	43117
American Equity Specialty Insurance Company	10819
Athena Assurance Company	41769
Automobile Insurance Company of Hartford, Connecticut (The)	19062
Charter Oak Fire Insurance Company (The)	25615
Commercial Guaranty Insurance Company	38385
Discover Property & Casualty Insurance Company	36463
Discover Specialty Insurance Company (a Surplus Lines company)	10213
Farmington Casualty Company	41483
Fidelity and Guaranty Insurance Company	35386
Fidelity and Guaranty Insurance Underwriters, Inc.	25879
Gulf Underwriters Insurance Company (a Surplus Lines company)	42811.
NIPPONKOA Insurance Company, Limited (U.S. Branch) - We do not	27073
own this Company; Travelers Marine, LLC is the U.S. Manager	
Northfield Insurance Company (a Surplus Lines company)	27987
Northland Casualty Company	24031
Northland Insurance Company	24015
Phoenix Insurance Company (The)	25623
Select Insurance Company	22233
St. Paul Fire and Marine Insurance Company	24767
St. Paul Guardian Insurance Company	24775
St. Paul Medical Liability Insurance Company	41750
St. Paul Mercury Insurance Company	24791
St. Paul Protective Insurance Company	19224
St. Paul Surplus Lines Insurance Company (a Surplus Lines company)	30481
Standard Fire Insurance Company (The)	19070
TravCo Insurance Company	28188
Travelers Casualty and Surety Company	19038
Travelers Casualty and Surety Company of America	31194
Travelers Casualty Company of Connecticut	36170
Travelers Casualty Insurance Company of America	19046

CERTIFICATION OF THE CHIEF EXECUTIVE OFFICER FOR THE MARYLAND REPORT ON SLAVERY ERA INSURANCE POLICIES

I, Brian MacLean, affirm under oath that I am the Chief Executive Officer of The Travelers Indemnity Company.

Further I certify that the attached report dated September 22, 2011 is true and not misleading. This report contains the most accurate information available at the time of its submission.

Brian MacLean

Subscribed to and sworn to before me on this 22nd day of September, 2011.

Linda M. Kolios, Notary Public

LINDA M. KOLIOS

My Commission Expires April 30, 2013

AUG 1 7 2011 Maryland Insurance Administration



August 10, 2011

Maryland Insurance Administration Slavery Era Insurance Registry 200 St. Paul Place Suite 2700 Baltimore, MD 21202

RE: SLAVEHOLDER POLICIES

AFFIDAVIT

Consistent with the Maryland code and regulations, Ohio Farmers Insurance Company submits this report on behalf of itself and the additional insurance companies listed below.

1. <u>Insurer Identification</u>

Our companies listed below are located at One Park Circle, P.O.Box 5001, Westfield Center, Ohio 44251-5001; telephone 330.887.0101, fax 330.887.0840 and website URL http://www.westfieldgrp.com.

COMPANY	NAIC No.
OHIO FARMERS INSURANCE COMPANY	24104
WESTFIELD INSURANCE COMPANY	24112
WESTFIELD NATIONAL INSURANCE COMPANY	24120
AMERICAN SELECT INSURANCE COMPANY	19992
OLD GUARD INSURANCE COMPANY	17558

2. CONTACT PERSON

The designated contact person for each of the companies is the Assistant Corporate Secretary and Manager of Corporate Compliance of each Company, John T. H. Batchelder. His address also is at One Park Circle, P.O. Box 5001, Westfield Center, Ohio 44251-5001; telephone 330.887.0980, fax 330.887.0678 and his email address is johnbatchelder@westfieldgrp.com.

3. RESEARCH METHODOLOGY

The only one of the above insurance companies which was founded during the slave era was Ohio Farmers Insurance Company which was founded in 1848. Ohio Farmers was not licensed in Maryland until 1913 and the other companies were not formed until after the Civil War. Our current procedures require maintaining policy records for the current year plus the previous five years. We have no individual records as far back as the slave era; after performing research, we cannot find any evidence in our insurance or corporate records at the Home Office or any other offices that any of our companies or predecessor companies were licensed in or operated in any slaveholding states during the pre-civil war era. Accordingly, we have no data which is responsive to the statute nor do we have any information to report.

4. NAMES OF SLAVES & SLAVEHOLDERS

We have no names of slaves or slaveholders to report.

		(James R Clan	
		James R. Clay	
State of Ohio	}		
County of Medina	}ss }		

Now Comes James R. Clay, who first being duly sworn according to law, on August , 2011 certifies as follows:

- 1. I am the Chief Executive Officer of the above companies;
- 2. The above statements are true and not misleading to the best of my knowledge, information and belief;
- 3. The above statements reflect the most accurate information available at the time of submitting this report.
- 4. Further, I say not.

Sworn to before me this 12^{12} day of August, 2011 by James R. Clay, a person known to me and who serves as Chief Executive Officer of the above companies.

JOHN T. H. BATCHELDER, Attorney-At-Law Notary Public, State of Ohio My Commission Has No Expiration Data

Kardud

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor Company	Earliest Date of Inc.
AAA Life Insurance Company	AAA Life Insurance Company		1969
AAA Mid-Atlantic Group	AAA Mid-Atlantic Insurance Company		1900
- To a time time time of the time time time time time time time tim	Keystone Insurance Company		after 1865
Accident Fund Insurance Co. of America	Accident Fund of Insurance Co. of America		1912
A CONCOUNT AND MICHAELES COLOTAMICHOS	Accident Fund General Insurance Co.		2005
	Accident Fund National Insurance Co.		2005
	CompWest Insurance Company		2004
	United Wisconsin Insurance Company		1983
ACE USA	ACE American Insurance Company		after 1865
7102 3371	ACE Fire Underwriters Insurance Company		after 1865
	ACE Property and Casualty Insurance Co	Aetna Insurance Company	1819
	Agri General Insurance Company	Actila insurance company	after 1865
	Bankers Standard Fire and Marine Company		after 1865
	Bankers Standard Insurance Company		after 1865
	Century Indemnity Company		after 1865
	Indemnity Insurance Co. of North America		after 1865
	Insurance Company of North America		1792
	Pacific Employers Insurance Company		after 1865
	Westchester Fire Insurance Company		1837
Advantage Worker's Comp. Ins. Co.	Advantage Worker's Comp. Ins. Co.		1981
Aetna Inc.	Aetna Life Insurance Company	See Report for Details	1853
	Aetna Health and Life Insurance Company		1981
	Aetna Insurance Company of Connecticut		1990
	Aetna Health Inc		2009
	Aetna Dental Inc.		2011
	Aetna Health Insurance Company		1974
Agency Insurance Company	Agency Insurance Company		1989
Alamance Insurance Company	Alamance Insurance Company		1970
Allstate Insurance Company	Allstate Insurance Company		1931
- mountain mountain of the party	Northbrook Insurance Company		1978
	Allstate Fire & Casualty Ins. Company		1972
	Allstate Life Insurance Company		1957
	Surety Life Insurance Company		1936
	Lincoln Benefit Life Company		1938
	Allstate Indemnity Company		1960
	Allstate Vehicle and Property Ins. Company		1979
	Allstate Property and Casualty Ins. Company		1985
	Encompass Indemnity Company		1984
	Charter National Life Insurance Company		1955
	Intraamerica Life Insurance Company		1965

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Allstate Assurance Company		1967
	Encompass Insurance Company		1995
Allstate Benefits	American Heritage Life Insurance Company		1945
Alpha Dental Programs, Inc.	Alpha Dental Programs, Inc.		after 1865
American Agricultural Insurance Company	American Agricultural Insurance Company		1948
American Capitol Insurance Company	American Capitol Insurance Company		1954
American Equity Investment Life Insurance Company	American Equity Investment Life Insurance Company		1996
American Family Life Assurance Co of Columbus (Aflac)	American Family Life Assurance Co of Columbus (Aflac)		1955
American Fidelity Assurance Company	American Fidelity Assurance Company		1960
American Fuji Fire & Marine Insurance Company	American Fuji Fire & Marine Insurance Company		1981
American Health and Life Insurance Company	American Health and Life Insurance Company		after 1865
	Sears Life Insurance Company		after 1865
	Triton Insurance Company		after 1865
American International Group, Inc. (AIG)	American General Assurance Company	See Report Six Cos. on or Before 1865	see report
	American General Indemnity Company		after 1865
	American General Life and Accident Ins. Co.		after 1865
	American General Life Insurance Company		after 1865
	American General Property Insurance Company		after 1865
	AIU Insurance Company		after 1865
	American Home Assurance Company		after 1865
	Chartis Casualty Company		after 1865
	Chartis Property Casualty Company		after 1865
	Commerce and Industry Insurance Company		after 1865
	Granite State Insurance Company		after 1865
	Illinois National Insurance Company		after 1865
	National Union Fire Ins. Co. of Pittsburgh, PA		after 1865
	New Hampshire Insurance Company		after 1865
	SunAmerica Annuity and Life Assurance Company		after 1865
	SunAmerica Life Assurance Company		after 1865
	The Insurance Company of the State of PA.		after 1865
	United Guaranty Commercial Insurance Co of N.C.		after 1865
	United Guaranty Mortgage Indemnity Insurance Co.		after 1865
	United Guaranty Residential Insurance Company		after 1865
	United Guaranty Residential Ins. Co. of N.C.		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	The United States Life Ins. Co. in the City of N.Y.		1850
	The Variable Annuity Life Insurance Company		after 1865
	Western National Life Insurance Company		after 1865
American Interstate Insurance Company	American Interstate Insurance Company		1986
American Medical Security Life Insurance Co.	American Medical Security Life Insurance Co.		1982
American Mining Insurance Company	American Mining Insurance Company		1989
American Modern Home Insurance Company	American Family Home Insurance Company		after 1865
· · ·	American Modern Home Insurance Company		after 1865
	American Southern Home Insurance Company		after 1865
	American Modern Select Insurance Company		after 1865
	American Western Home Insurance Company		after 1865
	American Modern Surplus Lines Insurance Co.		after 1865
American National Insurance Company	American National Insurance Company		1905
, ,	Farm Family Life Insurance Company		1953
	American National Life Insurance Co of Texas		1954
	Garden State Life Insurance Company		1956
	American National Property and Casualty Co		1973
	United Farm Family Insurance Company		1988
	Standard Life and Accident Insurance Co		1976
	American National General Insurance Company		1980
American National Property and Casualty Co.	American National Property and Casualty Co		1984
1 ,	American National General Insurance Company		2005
American Pioneer Life Insurance Company	American Pioneer Life Insurance Company		1967
American Progressive Life & Health Ins. Co of New York	American Progressive Life & Health Ins. Co of New York		1961
American Safety Casualty Insurance Company	American Safety Casualty Insurance Company		1981
American Sentinel Insurance Company	American Sentinel Insurance Company		1956
American Specialty Health Insurance Company	American Specialty Health Insurance Company	Western Diversified Life Insurance Co.	
American United Life Insurance Company	American United Life Insurance Company		after 1865
. ,	Pioneer Mutual Life Insurance Company		after 1865
	The State Life Insurance Company		after 1865
Americo Financial Life & Annuity Insurance Co.	Americo Financial Life & Annuity Insurance Co.	The College Life Insurance Company of America	1894
	Financial Assurance Life Insurance Company	1 200 7 200 200	after 1865
	Great Southern Life Insurance Company		after 1865
	Investors Life Insurance Company of North America		after 1865
	National Farmers Union Life Insurance Company		after 1865
	Ohio State Life Insurance Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Ameriprise Auto & Home Insurance	Ameriprise Auto & Home Insurance		after 1865
·	IDS Property Casualty Insurance Company		after 1865
Amerisure Mutual Insurance Company	Amerisure Mutual Insurance Company		1912
. ,	Amerisure Insurance Company		1912
Ameritas Life Insurance Corp.	Ameritas Life Insurance Corp.		after 1865
·	Acacia Life Insurance Company		after 1865
Amica Mutual Insurance Company	Amica Mutual Insurance Company	Automobile Mutual Insurance Company	1907
	Amica Life Insurance Company		1968
Arch Reinsurance Company	Arch Reinsurance Company		after 1865
Argo Group USA	Argonaut Insurance Company	Argonaut Insurance Exchange	1957
	Argonaut-Midwest Insurance Company		1962
	Argonaut Great Central Insurance Company		1966
	Colony Specialty Insurance Company	Cardinal Casualty Company	1978
	Rockwood Casualty Insurance Company		1977
Armed Forces Insurance Exchange	Armed Forces Insurance Exchange	Army Cooperative Fire Association	1887
Assurant Inc.	American Bankers Insurance Company of Florida		after 1865
	American Bankers Life Assurance Company of Florida		after 1865
	American Memorial Life Insurance Company		after 1865
	American Reliable Insurance Company		after 1865
	American Security Insurance Company		after 1865
	Assurant Inc.		after 1865
	Consumers Assists Network Association, Inc.		after 1865
	Dental Health Alliance LLC		after 1865
	Disability Reinsurance Management Services Inc.		after 1865
	Federal Warranty Service Corporation		after 1865
	Insureco Agency & Insurance Services, Inc.		after 1865
	John Alden Life Insurance Company		1973
	NSM Sales Corporation		after 1865
	Quail Roost Properties, Inc.		after 1865
	SSDC Services Corp.		after 1865
	Standard Guaranty Insurance Company		after 1865
	Time Insurance Company		1910
	TrackSure Insurance Agency, Inc.		after 1865
	Union Security Insurance Company		1910
	United Service Protection Corp.		after 1865
	U.S. Insurance Services, Inc.		after 1865
	Voyager Indemnity Insurance Company		after 1865
Assured Guaranty Corp.	Assured Guaranty Corp.		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Assured Guaranty Municipal Corp.		after 1865
Assurity Life Insurance Company	Assurity Life Insurance Company	Grand Insurance Company	1964
Aurora National Life Assurance Company	Aurora National Life Assurance Company		1961
AXA Corporate Solutions Life Reinsurance	AXA Corporate Solutions Life Reinsurance	Acquired: Baltimore Life	1859
Company	Company	Insurance Co.1867	
		Acquired: The Life Assoc. of the	
		South of Montgomery, AL. 1867	
		Acquired: Virginia Insurance	
		Co. of Staunton Virginia 1871	
Baltimore Equitable Society	Baltimore Equitable Society		1794
The Baltimore Life Insurance Company	The Baltimore Life Insurance Company		1882
BancInsure, Inc.	BancInsure, Inc.		1985
Bankers Independent Insurance Company	Bankers Independent Insurance Company		1936
Banner Life Insurance Company	Banner Life Insurance Company		after 1865
	William Penn Life Insurance Company of New York		after 1865
Beazley Insurance Company, Inc.	Beazley Insurance Company, Inc.	Omaha Property and Casualty Insurance Company	1978
Berkley Insurance Company	Berkley Insurance Company	Signet Reinsurance Company	1975
Berkley Life and Health Insurance Company	Berkley Life and Health Insurance Company	Investors Guaranty Life Insurance Company	1978
Berkley National Insurance Company	Berkley National Insurance Company	Union Standard Insurance Company of Oklahoma, Inc.	1980
Berkley Regional Insurance Company	Berkley Regional Insurance Company	National Assurance Underwriters	1985
Boston Mutual Life Insurance Company	Boston Mutual Life Insurance Company	Merged with Atlantic Mutual Life Ins. Co. of Greenfield, Mass. 1901	1890
Brethren Mutual Insurance Company	Brethren Mutual Insurance Company		after 1865
Bristol West Insurance Company	Bristol West Insurance Company		1968
Brokers National Life Assurance Company	Brokers National Life Assurance Company		1986
Brotherhood Mutual Insurance Company	Brotherhood Mutual Insurance Company	Brotherhood Aid Assoc. of the Defenseless Mennonite Church of N.A.	1917
Builders Mutual Insurance Company	Builders Mutual Insurance Company		1997
Builders Insurance Group, Inc.	Builders Insurance Group, Inc.		1992
	Association Insurance Company	Jefferson Pilot Property and Casualty Co.	1984
	Association Services Inc		1997
	Vinings Insurance Company		1962

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
CNA Insurance Companies	American Casualty Company of Reading, PA.		after 1865
	Columbia Casualty Company		after 1865
	Continental Assurance Company		after 1865
	The Continental Insurance Company ("CIC")	By merger with CIC Niagara Falls Insurance Company Est. 1850	1852
		By merger with CIC Firemen's Ins. Co. of Newark, NJ. Est. 1855	
		By merger with CIC The Phenix Ins. Company Est. 1853	
	National Fire Insurance Company of Hartford		after 1865
	Transportation Insurance Company		after 1865
	Universal Surety of America		after 1865
	Valley Forge Insurance Company		after 1865
	Western Surety Company		after 1865
California Casualty Indemnity Exchange	California Casualty Insurance Company		1914
	California Casualty & Fire Insurance Company		after 1865
	California Casualty General Ins. Co. of Oregon		after 1865
	California Casualty Compensation Insurance Company		after 1865
Capitol Indemnity Corporation	Capitol Indemnity Corporation		1959
Capitor indentifity Corporation	Capitol Indemnity Corporation Capitol Specialty Insurance Corporation	All-Star Title Insurance, Inc.	1961
	Platte River Insurance Company	AMI Credit Insurance Company	1972
Cardif Dranarty and Casualty Incurance Company	· · · · · · · · · · · · · · · · · · ·	Aivii Credit insurance Company	2005
Cardif Property and Casualty Insurance Company	Cardif Property and Casualty Insurance Company		
CareFirst, Inc.	CareFirst of Maryland, Inc. CareFirst BlueChoice, Inc.		after 1865
	*		after 1865 after 1865
	The Dental Network, Inc.		
	FirstCare, Inc.		after 1865 after 1865
Caralina Casualtu Insuranas Campanu	Group Hospitalization and Medical Services, Inc.		1943
Carolina Casualty Insurance Company	Carolina Casualty Insurance Company		
Caterpillar Life Insurance Company	Caterpillar Life Insurance Company	Ontholia Krainhta and Ontholia	1979
Catholic Financial Life	Catholic Financial Life	Catholic Knights and Catholic Family Life merger	1868
Central Security Life Insurance Company	Central Security Life Insurance Company	, ,	1955
Central States Health & Life Co. of Omaha	Central States Health & Life Co. of Omaha		1932
Central States Indemnity Co. of Omaha	Central States Indemnity Co. of Omaha		after 1865
•	CSI Life Insurance Company		after 1865
Cherokee National Life Insurance Company	Cherokee National Life Insurance Company		1958
Chrysler Insurance Company	Chrysler Insurance Company		1964

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Cigna Health Care	Cigna Dental Health of Maryland, Inc.		2004
	Cigna Health and Life Insurance Company		1963
	Cigna HealthCare Mid-Atlantic, Inc.		1985
	Connecticut General Life Insurance Company		1865
	Gillette Ridge Apartments, LLC		2003
	Life Insurance Company of North America		1957
Cincinnati Financial Corporation	The Cincinnati Casualty Company	Acquired: Woodman's Protective Assoc.(Inter-Ocean) Est. 1903	1950
	The Cincinnati Indemnity Company		1988
	The Cincinnati Life Insurance Company		2008
	The Cincinnati Specialty Underwriters Insurance		2008
Citizana Cagurity Life Incurance Company	Company		1965
Citizens Security Life Insurance Company	Citizens Security Life Insurance Company Clarendon National Insurance Company	Cavaliar Ingurance Corneration	1941
Clarendon Insurance Group, Inc.	Clarendon America Insurance Company Clarendon America Insurance Company	Cavalier Insurance Corporation	1980
		First of Coordia Insurance	
	Harbor Specialty Insurance Company	First of Georgia Insurance Company	1956
	Clarendon Select Insurance Company	Winston Insurance Company	1986
Columbian Financial Group	Columbian Mutual Life Insurance Company		1882
	Columbian Life Insurance Company		1988
Combined Insurance Company of America	Combined Insurance Company of America		1949
Commonwealth Annuity and Life Insurance Company	Commonwealth Annuity and Life Insurance Company		1882
	First Allmerica Financial Life Insurance Company		1967
Constitution Life Insurance Company	Constitution Life Insurance Company		1951
Continental Western Group	Acadia Insurance Company		after 1865
·	Continental Western Insurance Company	Western Grain Dealers Mutual Fire Insurance Association	1907
	Firemen's Insurance Company of Washington D.C.		after 1865
	Tri-State Insurance Company of Minnesota	Tri-State Mutual Insurance Company	1902
	Union Insurance Company		after 1865
Country Financial	Country Casualty Insurance Company		1964
	Country Preferred Insurance Company		1953
	Country Life Insurance Company		1928
	Country Investors Life Assurance Company		1981
Coventry Health Care of Delaware, Inc.	Coventry Health Care of Delaware, Inc.		after 1865
	Coventry Health and Life Insurance Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Cumberland Insurance Group	Cumberland Mutual Fire Insurance Company	By Merger: Mutual Fire	1844
		Insurance Co. of Calvert County	
		Est. 1858	
		By Merger: Chester Mutual	
		Insurance Company Est. 1840	
	Cumberland Insurance Company, Inc.		1982
CUNA Mutual Group	CUNA Mutual Insurance Society	By Merger: Lutheran Mut.Life Ins.Co. Est. 1882	1935
	MEMBERS Life Insurance Company	CUDIS Insurance Society, Inc.	1976
	CUMIS Insurance Society, Inc.		1960
	CMG Mortgage Insurance Company	Investors Mortgage Insurance Company	1981
	CMG Mortgage Assurance Company	Investor Mortgage Company of California	1969
Deerfield Insurance Company	Deerfield Insurance Company	The First Reinsurance Company of Hartford	1911
	Delos Insurance Company	Sirius America Insurance Company	1977
	Naxos Insurance Company	, ,	2006
Delta Dental Insurance Company	Delta Dental Insurance Company		after 1865
Delta Dental of Pennsylvania	Delta Dental of Pennsylvania		after 1865
Dentegra Insurance Company	Dentegra Insurance Company		after 1865
Developers Surety and Indemnity Company	Developers Surety and Indemnity Company		after 1865
Dominion Dental Services, Inc.	Dominion Dental Services, Inc.		after 1865
Donegal Mutual Insurance Company	Donegal Mutual Insurance Company		1889
. ,	Atlantic States Insurance Company		1986
E.M.C. Insurance Companies	Employers Mutual Casualty Company		after 1865
·	E.M.C. National Life Company	National Travelers Life Company	1907
Eagle Life Insurance Company	Eagle Life Insurance Company		2008
Eastern Insurance Holdings	Allied Eastern Indemnity Company		after 1865
-	Eastern Advantage Assurance Company		after 1865
	Eastern Alliance Insurance Company		after 1865
Employers Life Company	Employers Life Company		1946
Employers Reassurance Corporation	Employers Reassurance Corporation	Puritan Life Insurance Company of Rhode Island	1907
Endurance American Insurance Company	Endurance American Insurance Company	CORE Insurance Company	1996
Endurance Reinsurance Corporation of America	Endurance Reinsurance Corporation of America	ERCA-NY	2002
Equitable Life & Casualty Insurance Company	Equitable Life & Casualty Insurance Company		1935
EquiTrust Life Insurance Company	EquiTrust Life Insurance Company	Continental Western Life	1966
Erie Insurance	Erie Family Life Insurance Company		1968
	Erie Insurance Company		1974

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Erie Insurance Company of New York		2007
	Erie Insurance Exchange		1925
	Erie Insurance Property & Casualty Company		1998
	Flagship City Insurance Company		1998
Essent Guaranty, Inc.	Essent Guaranty, Inc.		2009
Esurance Insurance Company	Esurance Insurance Company		1933
Factory Mutual Insurance Company	Factory Mutual Insurance Company		after 1865
Farmers Insurance Exchange	Farmers Insurance Exchange		1928
<u> </u>	Truck Insurance Exchange		1935
	Mid-Century Insurance Company		1949
	Farmers New Century Insurance Company		1997
Farmers Mutual Fire Insurance Co. of Salem County	Farmers Mutual Fire Insurance Co. of Salem County		2005
Farmers New World Life Insurance Company	Farmers New World Life Insurance Company		1911
FCCI Insurance Group	Monroe Guaranty Insurance Company		1969
·	FCCI Insurance Company	FCCI Self Insurance Fund	1974
	National Trust Insurance Company	National Trust Insurance Company	1959
Federal Insurance Company	Federal Insurance Company	1 7	after 1865
1	Vigilant Insurance Company		after 1865
	Great Northern Insurance Company		after 1865
	Pacific Indemnity Company		after 1865
	Chubb Custom Insurance Company		after 1865
	Chubb National Insurance Company		after 1865
	Chubb Indemnity Insurance Company		after 1865
	Executive Risk Indemnity Inc.		after 1865
	Executive Risk Specialty Insurance Company		after 1865
Federal Life Insurance Company	Federal Life Insurance Company		1899
Federated Insurance Group	Federated Mutual Insurance Company		1904
	Federated Life Insurance Company		1958
	Federated Service Insurance Company		1972
Fidelity & Guaranty Life Insurance Company	Fidelity & Guaranty Life Insurance Company		1959
Fidelity Life Association	Fidelity Life Association	Mystic Workers of the World	1896
Fidelity Security Life Insurance Company	Fidelity Security Life Insurance Company	, , , , , , , , , , , , , , , , , , , ,	1969
Firemen's Insurance Company of Washington, D.C.	Firemen's Insurance Company of Washington, D.C.		after 1865
First American Property & Casualty Insurance Company	First American Property & Casualty Insurance Company	Great Pacific Insurance Company	1977
First Financial Insurance Company	First Financial Insurance Company		after 1865
5 (Five) Star Life Insurance Company	5 (Five) Star Life Insurance Company	Armed Forces Benefit Services, Inc.	after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Florists' Mutual Insurance Company	Florists' Mutual Insurance Company	Florists Hail Association	1887
Ford Credit	The American Road Insurance Company		1959
	Vista Life Insurance Company		1974
Foremost Insurance Company	American Federation Insurance Company		1983
	Foremost Insurance Company		1952
	Foremost Property & Casualty Insurance Company		1985
	Foremost Signature Insurance Company		1982
Frederick Mutual Insurance Company	Frederick Mutual Insurance Company		1844
GEICO	Government Employees Insurance Company		1937
	GEICO General Insurance Company		1935
	GEICO Indemnity Company		1961
	GEICO Casualty Company		1982
General Reinsurance Corporation	Berkshire Hathaway Homestate Insurance Company		after 1865
	California Insurance Company		after 1865
	Continental Indemnity Company		after 1865
	Laurier Indemnity Company		after 1865
	Central States Indemnity Co. of Omaha		after 1865
	Fairfield Insurance Company		after 1865
	General Re Life Corporation		after 1865
	General Reinsurance Corporation		after 1865
	General Star National Insurance Company	The Eureka Fire & Marine	1864
		Insurance Company	
	Genesis Insurance Company		after 1865
	Idealife Insurance Company		after 1865
	The Medical Protective Company		after 1865
	National Indemnity Company		after 1865
	National Liability & Fire Insurance Company		after 1865
	Berkshire Hathaway Assurance Corporation		after 1865
	Stonewall Insurance Company		after 1865
	Berkshire Hathaway Life Insurance Co. of Nebraska		after 1865
	Unione Italiana Reinsurance Company of America		after 1865
-	Atlanta International Insurance Company		after 1865
	Commercial Casualty Insurance Company		after 1865
	American Centennial Insurance Company		after 1865
	National Reinsurance Corporation	The Eagle Fire Company of New York	1906
	Seaworthy Insurance Company		after 1865
	United States Liability Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Genworth	Continental Life Insurance Company		1983
	Genworth Life and Annuity Insurance Company		1871
	Genworth Life Insurance Company		1988
GeoVera Holdings, Inc.	GeoVera Insurance Company		after 1865
	GeoVera Specialty Insurance Company	United States Fidelity and	1898
		Guaranty company	
Gerber Life Insurance Company	Gerber Life Insurance Company		1967
GMAC Insurance	GMAC Insurance Management Corporation		after 1865
Golden Rule Insurance Company	Golden Rule Insurance Company		1959
Goodville Mutual Casualty Company	Goodville Mutual Casualty Company		1886
Government Personnel Mutual Life Insurance	Government Personnel Mutual Life Insurance		1934
Company	Company		
Gramercy Insurance Company	Gramercy Insurance Company		1979
Gray Insurance Company	Gray Insurance Company		1977
Great American Financial Resources, Inc.	Great American Financial Resources, Inc.		after 1865
	Great American Life Insurance Company		after 1865
	Annuity Investors Life Insurance Company		after 1865
	Manhattan National Life Insurance Company		after 1865
	Loyal American Life Insurance Company		after 1865
	United Teacher Associates Insurance Company		after 1865
	American Retirement Life Insurance Company		after 1865
	Great American Life Assurance Company		after 1865
	Continental General Insurance Company		after 1865
	Central Reserve Life Insurance Company		after 1865
	United Benefit Life Insurance Company		after 1865
	Provident American Life and Health Insurance		after 1865
	Company		
Great American Insurance Group	Great American Insurance Company		1872
	Great American Assurance Company		1905
	Great American Insurance Company of New York		1947
	Great American Alliance Insurance Company		1945
	Great American Security Insurance Company		1987
	Great American Spirit Insurance Company		1988
	Great American Protection Insurance Company		1990
	Great American Contemporary Insurance Company		1996
	Great American Casualty Insurance Company		1981
GreatAmerican Insurance Group	Republic Indemnity Company of America		1972
 F	Republic Indemnity Company of California		1982
Great Divide Insurance Company	Great Divide Insurance Company	Implement Dealers Mutual Fire Insurance Company	1903

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Great West Casualty Company	Great West Casualty Company		after 1865
Great Western Insurance Company	Great Western Insurance Company		1983
Greater New York Insurance Group	Greater New York Mutual Insurance Company	Greater New York Taxpayers	1927
		Mutual Insurance Association	
	Insurance Company of Greater New York		after 1865
	The Strathmore Insurance Company		after 1865
	The GNY Custom Insurance Company		after 1865
Guard Insurance Group	AmGuard Insurance Company		1982
-	EastGuard Insurance Company	Mutual Fire Insurance Company	1827
	NorGuard Insurance Company		1987
	Guggenheim Life and Annuity Company	Wellmark Community Insurance,	after 1865
		Inc.	
HM Insurance Group	HM Life Insurance Company		after 1865
Hallmark Financial Services, Inc.	Hallmark Insurance Company		after 1865
	Hallmark National Insurance Company		after 1865
	American Hallmark Insurance Company		after 1865
Hanover Insurance Group, Inc.	The Hanover Insurance Company		after 1865
·	Allmerica Financial Alliance Insurance Company		after 1865
	Hanover American Insurance Company		after 1865
	Massachusetts Bay Insurance Company		after 1865
	Citizens Insurance Company of America		after 1865
	CampMed Casualty & Indemnity Company, Inc. of		after 1865
	MD.		
	Professionals Direct Insurance Company		after 1865
	Nova Casualty Insurance Company		after 1865
	Verlan Fire Insurance Company		after 1865
	AIX Specialty Insurance Company		after 1865
Harford Mutual Insurance Company	Harford Mutual Insurance Company	Mutual Fire Insurance Company in Harford County	1842
	Firstline National Insurance Company	The state of the s	1988
Harleysville Insurance	Harleysville Mutual Insurance Company		1917
	Harleysville Insurance Company		1930
	Harleysville Preferred Insurance Company		1985
	Harleysville Worcester Insurance Company	Worcester Mutual Fire	1824
	a system seems meanance company	Insurance Company	,_,
	Harleysville Life Insurance Company		after 1865
Hartford Financial Services Group	Hartford Fire Insurance Co.		pre 1865
•	Hartford Casualty Insurance Co.		after 1865
	Hartford Accident and Indemnity Company		after 1865
	Hartford Underwriters Insurance Co.		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Twin City Insurance Company		after 1865
	Pacific Ins. Co., Ltd.		after 1865
	Sentinel Ins. Co., Ltd		after 1865
	Hartford Ins. Co. of the Midwest		after 1865
	Trumbull Ins. Co.		after 1865
	Nutmeg Ins. Co.		after 1865
	Property & Casualty Ins. Co. of Hartford		after 1865
	American Maturity Life Ins. Co.		after 1865
	Hartford International Life Reassurance Corp.		after 1865
	Hartford Life & Accident Ins. Co.		after 1865
	Hartford Life and Annuity Ins. Co.		after 1865
	Hartford Life Ins. Co.		after 1865
Hartford Steam Boiler Inspection & Insurance Co.	Hartford Steam Boiler Inspection & Insurance Co.		1866
Hiscox Insurance Company	Hiscox Insurance Company	American Life Stock Insurance Company	1952
Homesite Insurance Company of the Midwest	Homesite Insurance Company of the Midwest		1969
Homesteaders Life Company	Homesteaders Life Company		1906
Housing Authority Insurance Group	Housing Authority Property Insurance, A Mutual Company		1987
	Housing Enterprise Insurance Company Inc.		2000
Illinois Mutual Life Insurance Company	Illinois Mutual Life Insurance Company	Illinois Woodmen Accident Assocation	1910
The Independent Order of Forrestors	The Independent Order of Forrestors		1874
Infinity Property & Casualty Corporation	Infinity Premier Insurance Company	Pennsylvania Central Railroad Company	1846
	Infinity Casualty Insurance Company		after 1865
	Infinity Reserve Insurance Company		after 1865
	Infinity Specialty Insurance Company		after 1865
	Infinity Select Insurance Company		after 1865
	Infinity Auto Insurance Company		after 1865
	Infinity Preferred Insurance Company		after 1865
	Infinity Indemnity Insurance Company		after 1865
	Infinity Assurance Insurance Company		after 1865
	Infinity Standard Insurance Company		after 1865
	Infinity County Mutual Insurance Company		after 1865
	Infinity Safeguard Insurance Company		after 1865
	Infinity General Insurance Company		after 1865
	Infinity Security Insurance Company		after 1865
	Hillstar Insurance Company		after 1865
	Infinity Insurance Company		after 1865
Injured Workers' Insurance Fund	Injured Workers' Insurance Fund	State Accident Fund	1914

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Ironshore Indemnity Inc.	Ironshore Indemnity Inc.		2008
Investors Heritage Life Insurance Company	Investors Heritage Life Insurance Company		1963
InvestorsTitle Insurance Company	InvestorsTitle Insurance Company		1970's
	National Investors Title Insurance Company		1970's
Jackson National Life Insurance Company	Jackson National Life Insurance Company		1961
Jewelers Mutual Insurance Company	Jewelers Mutual Insurance Company		1913
Kaiser Permanente	Kaiser Found. Health Plan of the Mid-Atlantic Sts.,		after 1865
	Inc.		
Kemper Corporation f/k/a Unitrin, Inc.	Kemper Independence Insurance Company		after 1865
	Merastar Insurance Company		after 1865
	Reliable Life Insurance Company, The		1911
	Response Insurance Company		after 1865
	Response Worldwide Direct Auto Insurance		after 1865
	Company		
	Response Worldwide Insurance Company		after 1865
	United Casualty Insurance Company of America		after 1865
	United Insurance Company of America		after 1865
	Unitrin Auto and Home Insurance Company		after 1865
	Unitrin Direct Property & Casualty Company		after 1865
	Unitrin Safeguard Insurance Company		after 1865
	Warner Insurance Company		after 1865
	Trinity Universal Insurance Company		after 1865
	Unitrin Preferred Insurance Company		after 1865
Knigthbrook Insurance Company	Knigthbrook Insurance Company		after 1865
Knights of Columbus	Knights of Columbus		1882
Lafayette Life Insurance Company	Lafayette Life Insurance Company		1905
Leading Insurance Services, Inc.	Leading Insurance Group Insurance Co., Ltd.	LIG Insurance Co., Ltd. Of South	1958
		Korea	
Legal Mutual Liablity Insurance Society of MD.	Minnesota Lawyers Mutual Insurance Company		1986
Liberty Bankers Life Insurance Company	Liberty Bankers Life Insurance Company		1957
	The Capitol Life Insurance Company		1905
LifeSecure Insurance Company	LifeSecure Insurance Company		1954
Lincoln General Insurance Company	Lincoln General Insurance Company		1977
Lincoln Heritage Life Insurance Company	Lincoln Heritage Life Insurance Company		after 1865
London Reinsurance Group	London Life Reinsurance Company	Providers Fidelity Life Insurance Company	1969
Lumbermen's Underwriting Alliance	Lumbermen's Underwriting Alliance		1905
Madison National Life Insurance Company, Inc.	Madison National Life Insurance Company, Inc.		1925
MAG Mutual Insurance Company	MAG Mutual Insurance Company		1982
Magna Carta Companies	Public Service Mutual Insurance Company		after 1865??
	Paramount Insurance Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Main Street America Group	Main Street America Assurance Company		after 1865
	NGM Insurance Company (National Grange Mutual)		1923
	Old Dominion Insurance Company		after 1865
Manhattan Life Insurance Company	Manhattan Life Insurance Company		1850
Markel American Insurance Company	Markel American Insurance Company		after 1865
	Markel Insurance Company		after 1865
Marquette National Life Insurance Company	Marquette National Life Insurance Company		1983
Mass Mutual Finance Group	Massachusetts Mutual Life Insurance Company		pre 1865
	C.M. Life Insurance Company		after 1865
	MMIL Bay State Life Insurance Company		after 1865
MedAmerica Insurance Company	MedAmerica Insurance Company		1987
Medical Mutual	Medical Mutual Life Insurance Society of Maryland		1975
	Professionals Advocate Insurance Company	Mid-Altantic Insurance Company	1985
Medical Protective Company	Medical Protective Company		1899
Merchants Bonding Company	Merchants Bonding Company		1933
MetLife	Metropolitan Life Insurance Company	Merged: The New England Mutual Life Insurance Company 1824	1868
	MetLife Insurance Company of Connecticut	Travelers Insurance Co. & Travelers Life & Annuity Co.	1864
	MetLife Investors USA Insurance Company	Security First Life Insurance Company	after 1865
	MetLife Investors Insurance Company	Cova Financial Services Life Insurance Company	after 1865
	New England Life Insurance Company	(part of The New England Mutual Life Ins. Co. merger in 2005)	after 1865
	Metropolitan Tower Life Insurance Company		after 1865
	General American Life Insurance Company		after 1865
	Economy Fire & Casualty Insurance Company	from St. Paul Fire & Marine Insurance Co.	1935
	Economy Premier Assurance Company	from St. Paul Fire & Marine Insurance Co.	1979
	Economy Preferred Insurance Company	from St. Paul Fire & Marine Insurance Co.	1980
	Metropolitan Casualty Insurance Company		1981
	Metropolitan Direct Property & Casualty Insurance Co.	The Great Southern Insurance Company	1949

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Metropolitan General Insurance Company		1980
	Metropolitan Group Property and Casualty Insurance	Metropolitan Reinsurance	1976
	Co.	Company	
Midland National Life Insurance Company	Midland National Life Insurance Company	A Division of Sammons Financial	1906
		Group	
	North American Company for Life and Health	A Division of Sammons Financial	1886
		Group	
Middlesex Insurance Company	Middlesex Insurance Company	A Division of Sentry Insurance	1824
Middlesex Mutual Assurance Company	Middlesex Mutual Assurance Company		1836
Midwest Employers Casualty Company	Midwest Employers Casualty Company		1986
Minnesota Lawyers Mutual	Minnesota Lawyers Mutual		1981
Minnesota Mutual Companies, Inc.	Minnesota Life Insurance Company	Banker Association of Minnesota	1880
' '			
	Securian Life Insurance Company	The Adjustable Life Insurance	1981
		Company	
	Securian Casualty Company		1994
	Cherokee National Life Insurance Company		1956
	CNL/Insurance America, Inc.		1987
Mitsui Sumitono Insurance Group	Mitsui Sumitomo Insurance Company of America		after 1865
·	Mitsui Sumitomo Insurance USA Inc.		after 1865
Modern Woodmen Fraternal Financial	Modern Woodmen of America		1883
Monumental Life Insurance Company	Monumental Life Insurance Company		1858
	Stonebridge Casualty Insurance Company		after 1865
	Stonebridge Life insurance Company		after 1865
	Transamerica Advisors Life Insurance Company		after 1865
	Transamerica Advisors Life Insurance Company of		after 1865
	N.Y.		
	Transamerica Financial Life Insurance Company		after 1865
	Transamerica Life Insurance Company		after 1865
	Western Reserve Life Assurance Co. of Ohio		after 1865
MONY Life Insurance Company of America	MONY Life Insurance Company of America		1969
	MONY Life Insurance Company	The Mutual Life Insurance	pre 1865
		Company of New York	
Mortgagee Guaranty Insurance Corporation	MGIC Assurance Corporation		after 1865
	MGIC Credit Assurance Corporation		after 1865
	MGIC Indemnity Corporation		after 1865
	MGIC Mortgage Reinsurance Corporation		after 1865
	MGIC Residential Reinsurance Corporation		after 1865
The Motorists Insurance Group	American Hardware Mutual Insurance Company		1899
MTL Insurance Company	MTL Insurance Company		1904

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Munich Reinsurance America, Inc.	Munich Reinsurance America, Inc.		1917
	American Alternative Insurance Corporation		1923
MutualAid eXchange	MutualAid eXchange		2001
Mutual Benefit Group	Mutual Benefit Insurance Company	name not given	1908
	Select Risk Insurance Company	name not given	1905
Mutual of America	Mutual of America Life Insurance Company		1945
Mutual of Omaha	Mutual of Omaha Insurance Company	Mutual Benefit Health & Accident Association	1909
	United of Omaha Life Insurance Company		after 1865
	United World Life Insurance Company		after 1865
National American Insurance Company	National American Insurance Company		1919
National Benefit Life Insurance Company	National Benefit Life Insurance Company		1962
National Health Insurance Company	National Health Insurance Company		1965
	Great Midwest Insurance Company		1985
	Imperium Insurance Company		1977
	Houston Specialty Insurance Company		2006
National Interstate Insurance Company	National Interstate Insurance Company		1989
	Triumphe Casualty Company		2001
National Life Group	National Life Insurance Company		1848
·	Life Insurance Company of the Southwest	Coleman Life Insurance Company	1955
National States Insurance Company	National States Insurance Company		after 1865
National Teachers Associates Life Insurance Co.	National Teachers Associates Life Insurance		after 1865
	Company		
National Western Life Insurance Company	National Western Life Insurance Company	name not given	1897
Nationwide Mutual Insurance Company	Nationwide Affinity Insurance Company of America	Presbyterian Minsters' Fund	1759
	Nationwide Assurance Company		after 1865
	Allied Insurance Company of America	Atlantic Floridian Insurance Company	after 1865
	Colonial County Mutual Insurance Company		after 1865
	Crestbrook Insurance Company		after 1865
	Nationwide Mutual Fire Insurance Company		after 1865
	Nationwide Mutual Insurance Company		after 1865
	Nationwide General Insurance Company		after 1865
	Nationwide Insurance Company of Florida		after 1865
	Nationwide Indemnity Company		after 1865
	Nationwide Lloyds		after 1865
	Nationwide Property and Casualty Insurance		after 1865
	Company		

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	National Casualty Company		after 1865
	Scottsdale Indemnity Company		after 1865
	Scottsdale Insurance Company		after 1865
	Scottsdale Surplus Lines Insurance Company		after 1865
	Wsetern Heritage Insurance Company		after 1865
	Titan Indemnity Company		after 1865
	Titan Insurance Company		after 1865
	Victoria Fire & Casualty Company		after 1865
	Victoria National Insurance Company		after 1865
	Victoria Select Insurance Company		after 1865
	Victoria Specialty Insurance Company		after 1865
	Nationwide Agribusiness Insurance Company		after 1865
	Farmland Mutual Insurance Company		after 1865
	Allied Property & Casualty Insurance Company		after 1865
	AMCO Insurance Company		after 1865
	Depositors Insurance Company		after 1865
	Nationwide Insurance Company of America		after 1865
Navigators Insurance Company	Navigators Insurance Company		after 1865
NCMIC Insurance Company	NCMIC Insurance Company		1946
New England Insurance Company	New England Insurance Company		1989
New York Life Insurance Company	New York Life Insurance Company		1845
• •	New York Life Insurance and Annuity Corporation		1980
	NYLIFE Insurance Company of Arizona		1987
North American Insurance Company	North American Insurance Company		1965
North Carolina Mutual Life Insurance Company	North Carolina Mutual Life Insurance Company		1898
Northwestern Mutual Life Insurance Company	Northwestern Mutual Life Insurance Company		1857
	Northwestern Mutual Long Term Care Insurance Company	Poulson Insurance Company of America	1953
Odyssey Re Group	Odyssey Reinsurance Company		after 1865
	Clearwater Insurance Company		after 1865
	Clearwater Select Insurance Company		after 1865
	Hudson Insurance Company		after 1865
Ohio Indemnity Company	Ohio Indemnity Company		1956
Ohio National Life Insurance Company	Ohio National Life Insurance Company		after 1865
4/12 sendin in by 4/19	Ohio National Life Assurance Corporation		after 1865
Old Republic International Corporation	American Guaranty Title Insurance Company		after 1865
,	Bituminous Casualty Corporation		after 1865
	Bituminous Fire and Marine Insurance Company		after 1865
	Great West Casualty Co.		after 1865
	Old Republic General Insurance Corp.		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Old Republic Home Protection Co.		after 1865
	Old Republic Ins. Co.		after 1865
	Old Republic Life Ins. Co.		after 1865
	Old Republic National Title Ins. Co.		after 1865
	Old Republic Security Assurance Co.		after 1865
	Old Republic Surety Co.		after 1865
	Old Republic Union Ins. Company		after 1865
	Republic Mortgage Insurance Company		after 1865
	Republic Mortgage Ins. Co. of Florida		after 1865
	Republic Mortgage Ins. Co. of N.C.		after 1865
Old United Insurance Companies	Old United Casualty Company		1988
Omni Insurance Group	Omni Indemnity Company		1974
One Beacon Insurance Group	One Beacon America Insurance Company	Employers Commercial Union Ins. Co.	1971
	The Employer's Fire Insurance Company		1921
	The Northern Assurance Company of America	Commercial Union Property & Casualty Insurance Co.	1987
	Essentia Insurance Company	American Central Ins. Co	1979
	OneBeacon Insurance Company	The Amerian Colonial Ins. Co.	1956
	Pennsylvania General Insurance Company		1955
	The Camden Fire Insurance Association	Camden Mutual Insurance Association	1841
	Homeland Insurance Company of New York	Ga Insurance Co. of New York	1988
	Houston General Insurance Company	New HG Insurance Company	1980
	Traders & General Insurance Company	Traders Indemnity Company	1980
	Atlantic Specialty Insurance Company	Atlantic Reinsurance Co.	1986
Oxford Life Insurance Company	Oxford Life Insurance Company		1968
Paramount Insurance Company	Paramount Insurance Company		1938
Partner Reinsurance Company of the U.S.	Partner Reinsurance Company of the U.S.		after 1865
	Partner Reinsurance Company of N.Y.		after 1865
Penn Millers Insurance Company	Penn Millers Insurance Company	Pennsylvania Millers Mutual Fire Insurance Company	1887
Penn Mutual Life Insurance Company	Penn Mutual Life Insurance Company		1847
	Penn Insurance and Annuity Company		1980
Penn National Insurance	Pennsylvania National Mutual Casualty Insurance Co.	Pennsylvania Threshermen & Farmers' Mutual Caualty Insurance Co.	1919
Pennsylvania Lumbermens Mutual Insurance Co.	Pennsylvania Lumbermens Mutual Insurance Co.		1895
PMA Companies	Pennsylvania Manufacturers Association Insurance Co.		1907
	Manufacturers Alliance Insurance Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Pennsylvania Manufactueres Indemnity Company		after 1865
PMI Mortgage Insurance Co.	PMI Mortgage Insurance Co.		after 1865
	PMI Insurance Company		after 1865
	PMI Mortgage Assurance Co.		after 1865
Phamacists Mutual Companies	Phamacists Mutual Companies	Druggists Mutual Insurance	1909
Philadelphia Insurance Companies	Philadelphia Insurance Company	Pennsylvania Mutual Casualty Insurance Company	1927
Praeton Insurance Company			after 1865
Presidential Life Insurance Company	Presidential Life Insurance Company		1965
Primamerica Life Insurance Company	Primamerica Life Insurance Company		1903
Principal Financial Group	Principal Life Insurance Company	Bankers Life Association	1879
·	Principal National Life Insurance Company	Progressive National Life Insurance Company	1967
ProAssurance Companies	ProAssurance Indemnity Company, Inc.	Medical Assurance	1975
•	ProAssurance Casualty Company		after 1865
	ProAssurance National Capital Insurance Company		after 1865
Producers Agriculture Insurance Company	Producers Agriculture Insurance Company		1929
Professional Solutions Insurance Company	Professional Solutions Insurance Company		2011
Protective Life Corporation	Protective Life Insurance Company		after 1865
·	West Coast Life Insurance Company		after 1865
	Lyndon Property Insurance Company		after 1865
Prudential Insurance Company of America	Prudential Insurance Company of America	The Prudential Friendly Society	1875
	Pruco Life Insurance Company		1971
	Prudential Annuities Life Assurance Corporation	Acquired earliest Hartford Variable Annuity Life Insurance Corporation	
	Prudential Retirement Income and Annuity Company	Acquired earliest Connecticut General Life & Casualty Insurance Co.	1981
PXRE Reinsurance Company	PXRE Reinsurance Company		1998
Pyramid Life Insurance Company	Pyramid Life Insurance Company		after 1865
Quanta Indemnity	Quanta Indemnity Company		1968
Radian Asset Assurance Inc.	Radian Asset Assurance Inc.	Vesta American Insurance Company	1985
	Municipal and Infrastructure Assurance Corporation		2008
Radian Group Inc.	Radian Guaranty Inc.		1976
	Amerin Guaranty Corporation		1974
Rampart Insurance Company	Rampart Insurance Company	Gan Anglo-American Insurance Company	1979

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Reliance Standard Life Insurance Company	Reliance Standard Life Insurance Company		after 1865
Riverport Insurance Company	Riverport Insurance Company		1989
Rockwood Casualty Insurance Company	Rockwood Casualty Insurance Company	Rockwood Insurance Company of	1977
		Indiana	
Royal Neighbors of America	Royal Neighbors of America		1895
RSUI Group, Inc.	RSUI Indemnity Company		1977
·	Landmark American Insurance Company		1976
	Covington Specialty Insurance Company		2007
Safety National Casualty Corporation	Safety National Casualty Corporation		1942
	Safety First Insurance Company		2001
Sagicor Life Insurance Company	Sagicor Life Insurance Company		1919
Seabright Insurance Company	Seabright Insurance Company		1986
Securian Financial Group	CNL/Insurance America, Inc.		1956
·	Securian Casualty Company		after 1865
Security Mutual Life Insurance Company of N.Y.	Security Mutual Life Insurance Company of N.Y.		1886
Security National Life Insurance Company	Security National Life Insurance Company		1965
SeeChange Health Insurance Company, Inc.	SeeChange Health Insurance Company, Inc.		1956
Selective Insurance Company of America	Selective Insurance Company of America		1926
	Selelctive Way Insurance Company		after 1865
	Selective Insurance Company of North Carolina		after 1865
	Selective Insurance Company of Southeast		after 1865
The Seneca Insurance Company	The Seneca Insurance Company		1978
Southern States Insurance Exchange	Southern States Insurance Exchange		1953
Sparta Insurance Company	Sparta Insurance Company	American Employers Insurance Company	1923
Standard Security Life Insurance Company of N.Y.	Standard Security Life Insurance Company of N.Y.		1958
StarNet Insurance Company	StarNet Insurance Company	Berkley National	1998
State Auto Insurance Companies	State Automobile Mutual Insurance		1921
	State Auto Property and Casualty Insurance		after 1865
	Company		
	Meridian Citizens Mutual Insurance Company		after 1865
	Meridian Security Insurance Company		after 1865
	Milbank Insurance Company		after 1865
SunAmerica Annuity and Life Insurance Company	SunAmerica Annuity and Life Insurance Company	Anchor National Life Insurance Company	1965
SunAmerica Life Insurance Company	SunAmerica Life Insurance Company	Sun Life Insurance Company of America	1897
Sun Life Assurance Company of Canada	Sun Life Assurance Company of Canada	Sun Company	1865
,,	Independence Life and Annuity Company	Indepedence Life and Accident Insurance Company	1945

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Sun Life and Health Insurance Company	Phoenix Life Insurance Company	1973
	Professional Insurance Company	Professional Insurance	1936
		Corporation	
S.USA Life Insurance Company, Inc.	S.USA Life Insurance Company, Inc.	SunAmerica National Life	1995
		Insurance Company	
Swiss Reinsurance America Corporation	Swiis Reinsurance America Corporation		after 1865
	North American Capacity Insurance Company		after 1865
	North American Elite Insurance Company		after 1865
	North American Specialty Insurance Company		after 1865
	Washington International Insurance Company		after 1865
	Swiss Re International, SE		after 1865
	Reassure America Life Insurance Company		after 1865
	Swiss Re Life & Health America Inc		after 1865
	Westport Insurance Corporation		after 1865
	First Specialty Insurance Corporation		after 1865
Symetra Life Insuarnce Company	Symetra Life Insuarnce Company		1959
, ,	Symetra National Life Insurance Company		after 1865
T.H.E. Insurance Company	T.H.E. Insurance Company	American Columbus Insurance	after 1865
, , , , , , , , , , , , , , , , , , , ,	,	Company	
Thrivent Financial for Lutherans	Thrivent Financial for Lutherans	Aid Association for Lutherans and	1902
		Lutheran Brotherhood	
Tokio Marine & Nichido Fire Insurance Co., Ltd.	Tokio Marine Fire Insurance Co., Ltd.		after 1865
,	Trans Pacific Insurance Company		after 1865
	TNUS Insurance Company	The Nichido Fire and Marine	after 1865
	, ,	Insurance Company, Ltd.	
Torchmark Corporation	Globe Life and Accident Insurance Company	1 ,	after 1865
	American Income Life Insurance Company		after 1865
	United American Insurance Company		after 1865
	Liberty National Life Insurance Company		after 1865
Torus US Services, Inc.	Torus National Insurance Company		After 1865
The Travelers Companies, Inc.	Travelers Indemnity Company (The)	Travelers Insurance Company	1863
	Travoloro macimility company (Tho)	Travelere mearance company	1000
	American Equity Insurance Company		after 1865
	American Equity Specialty Insurance Company		after 1865
	Athena Assurance Company		after 1865
	Automobile Insurance Co. of Hartford, Connecticut		after 1865
	Charter Oak Fire Insurance Company (The)		after 1865
	Commercial Guaranty Insurance Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
	Discover Property and Casualty Insurance Company		after 1865
	Discover Specialty Insurance Company		after 1865
	Farmington Casualty Company		after 1865
	Fidelity and Guaranty Insurance Company		after 1865
	Fidelty and Guaranty Insurance Underwriters, Inc.		after 1865
	Gulf Underwriters Insurance Company		after 1865
	NIPPONKOA Insurance Company, Limited		after 1865
	Northfield Insurance Company		after 1865
	Northland Casualty Insurance Company		after 1865
	Northland Insurance Company		after 1865
	Phoenix Insurance Company (The)		after 1865
	Select Insurance Company		after 1865
	St. Paul Fire and Marine Insurance Company		1853
	St. Paul Guardian Insurance Company		after 1865
	St. Paul Medical Liaiblity Insurance Company		after 1865
	St. Paul Mercury Insurance Company		after 1865
	St. Paul Protective Insurance Company		after 1865
	St. Paul Surplus Lines Insurance Company		after 1865
	Standard Fire Insurance Company (The)		after 1865
	TravCo Insurance Company		after 1865
	Travelers Casualty and Surety Company		after 1865
	Travelers Casualty and Surety Company of America		after 1865
	Travelers Casualty Company of Connecticut		after 1865
	Travelers Casualty Insurance Company of America		after 1865
	Travelers Commercial Casualty Company		after 1865
	Travelers Commercial Insurance Company		after 1865
	Travelers Excess and Surplus Lines Company		after 1865
	Travelers Home and Marine Insurance Company (The)		after 1865
	Travelers Indemnity Company of America (The)		After 1865
	Travelers Indemnity company of Connecticut (The)		1859
	Travelers Personal Insurance Company		after 1865
	Travelers Personal Security Insurance Company		after 1865
	Travelers Property Casualty Company of America		after 1865
	Travelers Property Casualty Company		after 1865
	United States Fidelity and Guaranty Company		after 1865
Triad Guaranty Insurance Corporation	Triad Guaranty Insurance Corporation		1988

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
Trustmark Insurance Companies	Trustmark Insurance Company		after 1865
	Trustmark Life Insurance Company		after 1865
21st Century Insurance	21st Century Assurance Company		1989
	21st Century Casualty Company		1987
	21st Century Centennial Insurance Company		1977
	21st Century Indemnity Insurance Company		1980
	21st Century Insurance Company		1967
	21st Century National Insurance Company		1994
	21st Century North America Insurance Company		1985
	21st Century Pacific Insurance Company		1900
	21st Century Preferred Insurance Company		1971
	21st Century Premier Insurance Company		1866
	21st Century Security Insurance Company		1951
UBS Life Insurance Company USA	UBS Life Insurance Company USA		1956
Ullico Inc.	Union Labor Life Insurance Company		after 1865
	ULLICO Life Insurance Company		after 1865
	ULLICO Casualty Company		after 1865
Unified Life Insurance Company	Unified Life Insurance Company		after 1865
Union Bankers Insurance Company	Union Bankers Insurance Company		1984
. ,	Pennsylvania Life Insurance Company		1951
Union Fidelity Life Insurance Company	Union Fidelity Life Insurance Company	Credit Life Insurance Company of Springfield, Illinois	1925
United Casualty and Surety Insurance Company	United Casualty and Surety Insurance Company		1989
United Concordia Insurance Company	United Concordia Insurance Company		after 1865
	United Concordia Life & Health Insurance Company		after 1865
United Health Group Companies	All Savers Insurance Company		1986
·	American Medical Security Insurance Company		1982
	Golden Rule Insurance Company		1959
	MAMSI Life and Health Insurance Company		1992
	PacifiCare Life and Health Insurance Company		1967
	Sierra Life & Health Insurance Company, Inc.		1997
	Uniamerca Insurance Company		1980
	United Health Care Insurance		1972
United Investors Life Insurance Company	United Investors Life Insurance Company		after 1865
United States Auto Association (USAA)	United States Auto Association (USAA)		1922
	USAA Casualty C ompany		after 1865
	USAA General Indemity Company		after 1865
	Garrison Property and Casualty Insurance Company		after 1865
United States Auto Association (USAA)	USAA Life Insurance Company		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor Company	Earliest Date of Inc.
	USAA Direct Life Insurance Company		after 1865
U.S. Finanical Life Insurance Company	U.S. Finanical Life Insurance Company		after 1865
United States Liability Insurance Group	United States Liability Insurance Company	United States Plate Glass Insurance Company of Philadelphia	1867
Unity Financial Life Insurance Company	Unity Financial Life Insurance Company	·	1964
Unity Mutual Life Insurance Company	Unity Mutual Life Insurance Company		after 1865
Unum Life Insurance Company of America	Unum Life Insurance Company of America		1903
	Provident Life and Accident Insurance Company		1887
	The Paul Revere Life Insurance Company		1895
	Colonial Life and Accident Insurance Company	Mutual Accident Company of South Carolina	1937
USAble Life	USAble Life		1980
Utica Mutual National Insurance Group	Utica Mutual Insurance Company		1914
·	Graphic Arts Mutual Insurance Company		1914
	Republic-Franklin Insurance Company		after 1865
Valiant Insurance Company	Valiant Insurance Company		1973
Washington National Insurance Company	Washington National Insurance Company		1870's
	Bankers Life and Casualty Company		after 1865
	Bankers Conseco Life Insurance Company		after 1865
	Colonial Penn Life Insurance Company		after 1865
	Conseco Life Insurance Company		after 1865
	Conseco Life Insurance Company of Texas		after 1865
Western & Southern Financial Group	The Western and Southern Life Insurance Company		after 1865
	Western-Southern Life Assurance Company		1888
	Columbus Life Insurance Company		after 1865
	Integrity Life Insurance Company		after 1865
Westfield Group	Ohio Farmers Insurance Company		1848
	Westfield Insurance Company		1929
	Westfield National Insurance company		1968
	American Select Insurance Company		after 1865
	Old Guard Insurance Company		1896
Westminster American Insurance Company	Westminster American Insurance Company	Carroll County Mutual Insurance Company	1870
Westport Insurance Corporation	Westport Insurance Corporation		after 1865
William Penn Association	William Penn Association		1886
Windsor Mount Joy Mutual Insurance Company	Windsor Mount Joy Mutual Insurance Company		after 1865
Woman's Life Insurance Society	Woman's Life Insurance Society		1892
Woodmen of the World Life Insurance Society	Woodmen of the World Life Insurance Society		1890
,	Omaha Woodmen Life Insurance Society		after 1865

Reporting Insurer or Reporting Holding Company	Members of Holding Company	Name of Earliest Predecessor	Earliest Date
		Company	of Inc.
WRM America Indemnity Company, Inc.	WRM America Indemnity Company, Inc.		1991
XL America Group, Inc.	XL Reinsurance America Inc.		after 1865
	Greenwich Insurance Company		after 1865
	Indian Harbor Insurance Company		after 1865
	XL Insurance American, Inc.		after 1865
	XI Insurance Company of New York, Inc.		after 1865
	XL Life Insurance & Annuity Company		after 1865
	XL Select Insurance Company		after 1865
	XL Specialty Insurance Company		after 1865
Zurich North America	American Guarantee and Liability Insurance		after 1865
	Company		
	American Zurich Insurance Company	Zurich General Accident and Liability Company	1912
	Assurance Company of America	, , ,	after 1865
	Colonial American Casualty and Surety Company		after 1865
	Empire Fire and Marine Insurance Company		after 1865
	Enpire Indemnity Insurance Company		after 1865
	Maryland Casualty Company		after 1865
	Northern Insurance Company of New York		after 1865
	Steadfast Insurance Company		after 1865
	Fidelity and Deposit Company of Maryland		1890
	Universal Underwriters Insurance Company		after 1865
	Universal Underwriters Life Insurance Company		after 1865
	Universal Underwriters of Texas Insurance Company		after 1865
	Zurich American Insurance Company		after 1865
	Zurich American Insurance Company of Illinois		after 1865