



Janet T. Mills
Governor

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL
AND FINANCIAL REGULATION
BUREAU OF INSURANCE
34 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0034

Eric A. Cioppa
Superintendent

June 17, 2020

Eric A. Cioppa, Superintendent
Maine Bureau of Insurance
34 State House Station
Augusta, ME 04333-0034

Dear Superintendent:

Pursuant to the provisions of 24-A M.R.S. §221 and in conformity with your instructions, a financial examination has been made of the

STARMOUNT LIFE INSURANCE COMPANY

a Maine domestic stock, life insurance company. The examination was conducted at its statutory home office in Portland, Maine. The following report is respectfully submitted.



PRINTED ON RECYCLED PAPER

OFFICES LOCATED AT 76 NORTHERN AVENUE, GARDINER,
MAINE 04345

www.maine.gov/insurance

Phone: (207) 624-8475 TTY: Please call Maine Relay 711 Consumer Assistance: 1-800-300-5000 Fax (207) 624-8599

REPORT OF EXAMINATION
STARMOUNT LIFE INSURANCE COMPANY
AS OF
DECEMBER 31, 2018

ACCEPTANCE OF REPORT OF EXAMINATION

WHEREAS a verified Report of Examination of Starmount Life Insurance Company dated June 17, 2020, was delivered to that insurer on June 23, 2020; and

WHEREAS Starmount Life Insurance Company and Bureau of Insurance staff have agreed to certain modifications with respect to the Report of Examination; and

WHEREAS I find such modifications proper; and

WHEREAS no hearing with respect to the Report of Examination has been requested by Starmount Life Insurance Company;

NOW THEREFORE, I accept the Report of Examination and hereby order it placed on file in the Bureau of Insurance as provided for by 24-A M.R.S. §226 (3).

Dated: June 30, 2020

Eric A. Cioppa
Eric A. Cioppa, Superintendent

TABLE OF CONTENTS

SCOPE OF EXAMINATION	1
SUMMARY OF SIGNIFICANT FINDINGS	1
PRIOR EXAMINATION	1
CURRENT EXAMINATION	1
THE COMPANY	2
HISTORY	2
CORPORATE OWNERSHIP	2
CORPORATE RECORDS	3
CORPORATE GOVERNANCE	3
TRANSACTIONS WITH AFFILIATES	5
TERRITORY & PLAN OF OPERATION	5
REINSURANCE	6
FINANCIAL STATEMENTS	6
STATEMENT OF ADMITTED ASSETS, LIABILITIES AND SURPLUS	7
STATEMENT OF OPERATIONS	9
STATEMENT OF CAPITAL AND SURPLUS	10
COMMENTS ON THE FINANCIAL STATEMENTS	11
SUBSEQUENT EVENTS	11
SUMMARY OF RECOMMENDATIONS	12

SCOPE OF EXAMINATION

Starmount Life Insurance Company (the “Company” or “Starmount”) was last examined as of December 31, 2017, by the State of Maine Bureau of Insurance (MBOI). The prior full-scope risk focused examination covered the period January 1, 2013 through December 31, 2017. The present full-scope risk focused examination was conducted by the MBOI and covered the period from January 1, 2018 through December 31, 2018.

This examination was a group coordinated examination. The MBOI served as the lead state on the examination and three other states accepted the invitation to participate on the coordinated examination of certain Unum Group companies. The Tennessee Department of Commerce and Insurance, Massachusetts Division of Insurance and New York Department of Financial Services served in the capacity of participating states.

This examination was performed pursuant to the risk-focused approach promulgated by the National Association of Insurance Commissioners (NAIC), in conformity with statutory accounting practices, NAIC guidelines, the 2019 Financial Condition Examiners Handbook and the laws, rules, and regulations prescribed or permitted by the State of Maine. The examination consisted of a review of the Company's operations, controls, and corporate governance, valuation of assets, and determination of liabilities at December 31, 2018. The examination also included the identification and evaluation of significant risks that could cause the Company's surplus to be materially misstated both currently and prospectively. Ernst & Young (EY) performed the 2018 external audit of Unum Group and the Company. EY work papers were utilized for this examination to the extent deemed appropriate in order to enhance the effectiveness and efficiency of this examination.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. The examination does not attest to the fair presentation of the financial statements included herein. Comments on various balance sheet items, for purposes of this report, may be limited to matters involving clarification, departures from laws, rules and regulations, and/or significant changes in amounts. To the extent deemed necessary, transactions occurring subsequent to the examination date were reviewed.

This examination report includes significant findings of fact, pursuant to 24-A M.R.S. §225 (1), and general information about the Company and its financial condition. There may be other items identified during the examination that, due to their nature, are not included herein, and are instead separately reported to other regulators and/or the Company.

SUMMARY OF SIGNIFICANT FINDINGS

PRIOR EXAMINATION

None noted.

CURRENT EXAMINATION

None noted.

THE COMPANY

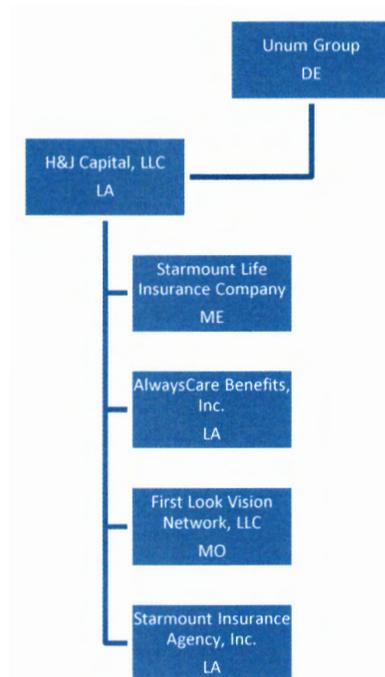
HISTORY

The Company is a life and health insurance company, originally incorporated in 1983 as Goudchaux/Maison Blanche Life Insurance Company under the laws of the State of Louisiana. The Company's name was changed in 1989 to Maison Blanche Life Insurance Company and again in 1992 to Starmount Life Insurance Company. The Company is a direct subsidiary of H&J Capital, LLC, which in turn is owned by Unum Group.

H&J Capital, LLC was acquired by Unum Group effective August 1, 2016, and the Company re-domesticated from Louisiana to Maine on December 20, 2018.

CORPORATE OWNERSHIP

The Company is a wholly owned subsidiary of Unum Group, a Delaware general business corporation that acts as a holding company for insurance and non-insurance subsidiaries. The Company is significantly dependent on Unum Group for business operations, administrative and other services. Unum Group's insurance and non-insurance subsidiaries operate in the United States (U.S.), the United Kingdom, Poland and in certain other countries. At December 31, 2018, Unum Group consisted of thirty-five affiliated companies operating under common management and control. An abbreviated organizational chart as of December 31, 2018 is presented below:



Unum Group's reporting segments at December 31, 2018 included the following: Unum US, Unum International, Colonial Life, Closed Block and Corporate. The Company's business is part of the Unum US reporting segment. The Unum US segment includes the following lines of business: group long-term and short-term disability insurance, group life and accidental death and dismemberment (AD&D) products, individual disability insurance (IDI), voluntary benefits, and dental and vision products. Unum US products are issued primarily by Unum Life Insurance

Company of America, Provident Life and Accident Insurance Company and Starmount. The Closed Block segment consists of IDI, group and individual LTC and other insurance products that are no longer actively marketed. At December 31, 2018, Unum Group has two Vermont domiciled captive insurers that were established for the limited purpose of reinsuring business attributable to certain policies issued by Unum Group subsidiary insurance companies, Fairwind Insurance Company and Northwind Reinsurance Company.

The corporate ownership structure for U.S. based insurance entities within Unum Group follows:

	NAIC Co. Code	Domiciliary State
Unum Group		DE
First Unum Life Insurance Company	64297	NY
Unum Life Insurance Company of America	62235	ME
Colonial Life & Accident Insurance Company	62049	SC
Fairwind Insurance Company		VT
Northwind Holdings, LLC		DE
Northwind Reinsurance Company	13031	VT
The Paul Revere Life Insurance Company	67598	MA
Unum Insurance Company	67601	ME
Provident Life and Accident Insurance Company	68195	TN
Provident Life and Casualty Insurance Company	68209	TN
H&J Capital, LLC		LA
Starmount Life Insurance Company	68985	ME

CORPORATE RECORDS

The Company's articles of incorporation, by-laws, and minutes of the board of directors meetings held during the period under examination were reviewed.

CORPORATE GOVERNANCE

The Company is governed and overseen by the board of directors and the management team of Unum Group. The Company maintains its own board of directors and corporate officers, thereby satisfying certain legal and insurance regulatory requirements.

At December 31, 2018, Unum Group's Board of Directors (the "Board") consisted of ten independent directors as well as Richard P. McKenney, Unum Group's President and Chief Executive Officer. The Board approves the strategic direction of Unum Group's business and financial objectives, monitors the effectiveness of management's implementation of policies and plans and provides oversight and support in achieving corporate objectives.

The Board has five standing committees: Audit Committee, Risk and Finance Committee, Governance Committee, Human Capital Committee, and Regulatory Compliance Committee. Unum Group also has an Investment Committee comprised of senior officers of Unum Group. The duties and responsibilities of the committees are set forth in Unum Group's by-laws and committee charters as applicable.

As of December 31, 2018, the Company's board of directors consisted of the following members:

<u>Name</u>	<u>Title</u>
Michael Quinn Simonds*	President and Chief Executive Officer, Unum US
Erich Sternberg*	President and Chief Executive Officer, Starmount
Timothy Gerald Arnold	President and Chief Executive Officer, Colonial Life
Puneet Bhasin	Executive Vice President, Chief Information and Digital Officer
Lisa Gonzalez Iglesias	Executive Vice President, General Counsel, Unum Group
John Francis McGarry*	Executive Vice President, Chief Financial Officer, Unum Group
Stephen Joseph Mitchell*	Senior Vice President, Chief Financial Officer US Finance

The Company's officers, as listed in the December 31, 2018 statutory annual statements, are:

<u>Name</u>	<u>Title</u>
Michael Quinn Simonds*	Chairman, Executive Vice President
Erich Sternberg*	President and Chief Executive Officer, Starmount
Timothy Gerald Arnold	Executive Vice President
Puneet Bhasin	Executive Vice President, Chief Information and Digital Officer
Lisa Gonzales Iglesias	Executive Vice President, General Counsel
John Francis McGarry*	Executive Vice President, Finance
Stephen Joseph Mitchell*	Senior Vice President, Finance
Cherie Antoinette Pashley*	Senior Vice President, Tax and Treasury
Daniel Jason Waxenberg*	Senior Vice President, Chief Accounting Officer
Jean Paul Jullienne	Vice President, Corporate Secretary
Benjamin Seth Katz	Vice President, Treasurer
Jeffrey Glenn Wild	Vice President, Chief Financial Officer, Starmount

* See below for a summary of changes to the Company's officers and directors subsequent to December 31, 2018:

Effective July 1, 2019, John Francis McGarry resigned as an officer of Unum Group and an officer of the Company due to his retirement. He also stepped down as a director of the Company effective June 17, 2019. Mr. McGarry served as Executive Vice President and Chief Financial Officer of Unum Group from April, 2015 through June, 2019 and prior to that served as President and Chief Executive Officer, Closed Block Operations of Unum Group and in various other capacities within Unum Group and Unum predecessor companies.

Effective June 17, 2019, Steven Andrew Zabel was elected as director of the Company. Effective July 1, 2019, Mr. Zabel, formerly Senior Vice President, President, Closed Block Operations of Unum Group was appointed as Executive Vice President, Chief Financial Officer of Unum Group and Executive Vice President, Finance of the Company. Mr. Zabel first began his tenure at Unum Group in August, 2013 as Chief Risk Officer and served as President, Closed Block Operations from May, 2015 through June, 2019.

Effective February 1, 2020, Michael Quinn Simonds was appointed as Chief Operating Officer of Unum Group. Effective March 18, 2020, Michael Quinn Simonds was appointed as President and Chief Executive Officer of the Company.

Effective March 13, 2020, Erich Sternberg resigned as President and Chief Executive Officer, Starmount and director of the Company.

Effective March 18, 2020, Stephen Joseph Mitchell resigned as Senior Vice President, Finance and, effective March 19, 2020, as a director of the Company.

Effective March 18, 2020, Daniel Jason Waxenberg was appointed as Senior Vice President, Global Financial Planning and Analysis of the Company. Effective March 19, 2020, Mr. Waxenberg was elected as a director of the Company.

Effective March 18, 2020, Cherie Antoinette Pashley was appointed as Senior Vice President, Chief Accounting Officer and Head of Treasury of the Company.

Effective March 19, 2020, Christopher Wallace Pyne was elected as a director of the Company.

TRANSACTIONS WITH AFFILIATES

The Company receives certain administrative and management services, including but not limited to: general management services and consultation; facilities management; information systems and records management; legal, regulatory, and compliance counsel; risk management; tax; human resources; internal audit; cash management; financial management; actuarial; pricing; and corporate relations and marketing and product support, management, and services including but not limited to: marketing; sales management; underwriting; claims; client services; and system support from Unum Group under the terms of a written general services agreement.

The Company received capital contributions of \$18,000,000 from H&J Capital, LLC in 2018.

TERRITORY & PLAN OF OPERATION

The Company is licensed in the District of Columbia and all states except New York and has a geographic concentration of written premiums in Louisiana and Mississippi. The geographic concentration was 43.4% in 2018. Starmount's core business is group dental and vision products. Starmount was acquired by Unum Group in August of 2016 and has experienced significant growth in written premiums since the acquisition. The Company's dental and vision products are marketed as part of an integrated offering of employee benefits along with other products offered by Unum US companies.

The Company previously sold critical illness, accident, group life, disability and limited benefit medical products. These products comprised a small portion of the Company's overall portfolio and were underwritten by a strategic partner. In 2018, Starmount ceased actively marketing its individual life and dental products. The Company continues to service these blocks of business.

REINSURANCE

The primary reinsurance arrangement for the accident and health business during the time period under examination was between the Company and its affiliates, AlwaysCare Benefits, Inc. (ACB) and Starmount Insurance Agency, Inc. (SIA), and National Guardian Life Insurance Company (NGL) and its designated subsidiaries. The arrangement involves two reinsurance agreements, one assumed and one ceded, with NGL which were originally entered into in 2002 and are discussed further below. Additionally, the Company cedes business through various other reinsurance agreements. The Company's significant reinsurance agreements are discussed below.

Reinsurance Assumed

Prior to October 1, 2016, the Company assumed 50% of the group dental, vision, disability, and accident and health business produced and serviced by ACB and SIA under administrative and marketing agreements for policies issued by NGL and its designated subsidiaries. Assumed premiums for 2018 were \$939,016 under this arrangement.

NGL's group life coverage as produced and serviced by ACB and SIA is also assumed by Starmount Life Insurance Company per the above agreement. Assumed premiums for 2018 were \$211,682.

Effective October 1, 2016, the marketing agreement was amended to terminate for new business and the Company assumed 100% of the business written under this agreement.

Reinsurance Ceded

The Company ceded 50% of the premium on its policies covering group dental and vision business to NGL under the administrative, marketing and ceded reinsurance agreements mentioned above. Effective January 1, 2013, the reinsurance percentage ceded by the Company to NGL changed from 50% to 25%. Effective October 1, 2016, the Company retained 100% of its risks.

On October 1, 2013, the Company entered into a 50% quota share reinsurance agreement with National Health Insurance Company (NHIC) to reinsure a block of individual dental business that was marketed by NHIC affiliates. The Company's ceded premiums for 2018 were \$4,816,991.

The Company also ceded to various reinsurers much of its life and AD&D business on legacy products that are no longer actively marketed. The Company primarily ceded such business to Swiss Re Life and Health America, Inc.

FINANCIAL STATEMENTS

The Statement of Admitted Assets, Liabilities and Surplus, the Statement of Operations, and the Statement of Capital and Surplus are as presented by management and audited by the Company's external auditors. It should be noted that these financial statements have not been audited by the MBOI and thus the MBOI does not express an opinion on the financial statements as a whole.

**STATEMENT OF ADMITTED ASSETS, LIABILITIES AND SURPLUS
AS OF DECEMBER 31, 2018**

<u>Assets</u>	
Bonds	\$ 43,562,193
Stocks:	
Common stocks	32,300
Real estate:	
Properties occupied by the company	5,513,040
Cash and cash equivalents	28,664,688
Contract loans	<u>780,240</u>
Subtotals, cash and invested assets	<u>78,552,461</u>
Investment income due and accrued	496,855
Premiums and considerations:	
Uncollected premiums and agents' balances in the course of collection	7,984,304
Deferred premiums and agents' balances and installments booked but deferred and not yet due	2,439,294
Reinsurance:	
Amounts recoverable from reinsurers	514,847
Other amounts receivable under reinsurance contracts	241,271
Current federal and foreign income tax recoverable and interest thereon	423,300
Guaranty funds receivable or on deposit	129,780
Electronic data processing equipment and software	829,307
Receivables from parent, subsidiaries and affiliates	2,393,733
Aggregate write-ins for other than invested assets	<u>35,162</u>
Total assets excluding Separate Accounts, Segregated Accounts, and Protected Cell Accounts	<u>94,040,314</u>
Total Assets	<u>\$ 94,040,314</u>
 <u>Liabilities</u>	
Aggregate reserve for life contracts	\$ 23,619,882
Aggregate reserve for accident and health contracts	258,289
Contract claims:	
Life	663,546
Accident and health	14,535,360
Premiums and annuity considerations for life and health contracts received in advance	3,290,519
Contract liabilities not included elsewhere:	
Interest maintenance reserve	16,765
Commissions to agents due and accrued	2,105,370

Commissions and expense allowances payable on reinsurance assumed	25,458
General expenses due or accrued	399,096
Taxes, licenses and fees due or accrued, excluding federal income taxes	3,263,784
Unearned investment income	31,653
Remittances and items not allocated	97,744
Miscellaneous liabilities:	
Asset valuation reserve	389,189
Aggregate write-ins for liabilities	<u>13,907</u>
Total liabilities excluding Separate Accounts business	<u>48,710,562</u>
Total liabilities	<u>\$ 48,710,562</u>
 <u>Capital and Surplus</u>	
Common capital stock	3,000,000
Gross paid in and contributed surplus	34,580,000
Unassigned funds (surplus)	7,749,752
Surplus	<u>42,329,752</u>
Total capital and surplus	<u>\$ 45,329,752</u>
Total liabilities, capital and surplus	<u>\$ 94,040,314</u>

STATEMENT OF OPERATIONS
YEAR ENDED DECEMBER 31, 2018

Premiums and annuity considerations for life and accident and health contracts	\$ 209,895,083
Net investment income	1,719,056
Amortization of Interest Maintenance Reserve	(1,577)
Commissions and expense allowances on reinsurance ceded	1,829,712
Miscellaneous income:	
Aggregate write-ins for miscellaneous income	<u>736,837</u>
Total	<u>\$ 214,179,111</u>
Death benefits	4,882,857
Disability benefits and benefits under accident and health contracts	138,838,515
Surrender benefits and withdrawals for life contracts	333,526
Interest and adjustments on contract or deposit-type contract funds	6,670
Increase in aggregate reserves for life and accident and health contracts	<u>1,132,456</u>
Totals	145,194,024
Commissions on premiums, annuity considerations, and deposit-type contract funds	21,374,543
Commissions and expense allowances on reinsurance assumed	399,264
General insurance expenses	45,737,067
Insurance taxes, licenses and fees, excluding federal income taxes	11,046,811
Increase in loading on deferred and uncollected premiums	1,663
Aggregate write-ins for deductions	<u>48,483</u>
Totals	<u>\$ 223,801,855</u>
Net gain from operations before dividends to policyholders and federal income taxes	<u>(9,622,744)</u>
Net gain from operations after dividends to policyholders and before federal income taxes	(9,622,744)
Federal and foreign income taxes	<u>(130,301)</u>
Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains or (losses)	(9,492,443)
Net realized capital gains (losses) less capital gains tax	<u>(5,562)</u>
Net income	<u>\$ (9,498,004)</u>

**STATEMENT OF CAPITAL AND SURPLUS
YEAR ENDED DECEMBER 31, 2018**

Capital and surplus, December 31, prior year	<u>\$ 37,449,357</u>
Net income	(9,498,004)
Change in net deferred income tax	(1,357,467)
Change in nonadmitted assets	819,359
Change in asset valuation reserve	(83,493)
Surplus adjustment:	
Paid in	<u>18,000,000</u>
Net change in capital and surplus	<u>\$ 7,880,394</u>
Capital and surplus, December 31, 2018	<u>\$ 45,329,752</u>

COMMENTS ON THE FINANCIAL STATEMENTS

NOTE 1 – RESERVES

Lewis & Ellis, Inc., (“consulting actuary”) was engaged to provide actuarial assistance with the financial examination of the Company as of December 31, 2018. The consulting actuary’s review included: participation in interviews and discussions with key personnel, including the Appointed Actuary, to gain an understanding of the corporate structure, products, services, and reserving and pricing processes, and to determine where the majority of risks lie; review of controls to mitigate certain reserving and pricing risks; review of the 2018 Statement of Actuarial Opinion and Actuarial Memorandum prepared by the Appointed Actuary; and review of the external auditor’s conclusions regarding the carried reserves. The reserves as reported by the Company were determined to be reasonable based on the review performed by the consulting actuary.

NOTE 2 – CAPITAL AND SURPLUS

The following table describes the capital and surplus changes for the one-year period since the MBOI's last examination of the Company, dated December 31, 2017:

Capital and surplus, December 31, 2017	<u>\$ 37,449,357</u>
Net Income	(9,498,004)
Change in net deferred income tax	(1,357,467)
Change in nonadmitted assets	819,359
Change in asset valuation reserve	(83,493)
Surplus adjustment:	
Paid in	<u>18,000,000</u>
Net change in capital and surplus	<u>\$ 7,880,394</u>
Capital and surplus, December 31, 2018	<u>\$ 45,329,752</u>

SUBSEQUENT EVENTS

On January 1, 2020, the Company was subject to an annual fee under section 9010 of the Federal Affordable Care Act (ACA). This annual fee will be allocated to individual health insurers based on the ratio of the amount of the entity’s net premiums written during the preceding calendar year to the amount of health insurance for any U.S. health risk that is written during the preceding calendar year. A health insurance entity’s portion of the annual fee becomes payable once the entity provides health insurance for any U.S. health risk for each calendar year beginning on or after January 1 of the year the fee is due. As of December 31, 2019, the Company had written health insurance subject to the ACA assessment, expected to conduct health insurance business in 2020, and estimated their pre-tax portion of the annual health insurance industry fee to be payable on September 30, 2020 to be \$4,330,882. This amount is reflected as an aggregate write-in for special surplus funds in the 2019 statutory annual statement.

Effective January 1, 2019, the Company entered into an investment management agreement with an affiliate, Provident Investment Management, LLC (PIM), under which PIM serves as the Company’s investment advisor with regard to designated assets.

Beginning January 1, 2019, Starmount is providing administrative services to Unum Group's employees under Unum Group's self-insured and self-funded dental plan.

The Company received \$20,000,000 in capital contributions from H&J Capital, LLC in 2019 and \$15,700,000 during the first quarter of 2020.

Effective January 1, 2020, the Company entered into a service agreement with an affiliate, Colonial Life and Accident Insurance Company ("Colonial"). Under this agreement, Colonial pays a monthly network access fee for use of Starmount's dental provider network.

On March 11, 2020, the World Health Organization declared the spreading coronavirus (COVID-19) outbreak a pandemic. On March 13, 2020, U.S. President Donald J. Trump declared the coronavirus pandemic a national emergency in the U.S. The epidemiological threat posed by COVID-19 is having disruptive effects on the economy, including disruption of the global supply of goods, reduction in the demand for labor, and reduction in the demand for U.S. products and services, resulting in a sharp increase in unemployment. The economic disruptions caused by COVID-19 and the increased uncertainty about the magnitude of the economic slowdown has also caused extreme volatility in the financial markets.

The full effect of COVID-19 on the U.S. and global insurance and reinsurance industry is still unknown at the time of releasing this report. The MBOI is expecting the COVID-19 outbreak to impact a wide range of insurance products and other areas of operations of insurers. The MBOI and all insurance regulators, with the assistance of the NAIC, are monitoring the situation through a coordinated effort and will continue to assess the impacts of the pandemic on U.S. insurers. The MBOI has been in communication with the Company regarding the impact of COVID-19 on its business operations and financial position and will continue to monitor the situation.

SUMMARY OF RECOMMENDATIONS

There are no report level recommendations.

**STATE OF MAINE
COUNTY OF KENNEBEC, SS**

Vanessa J. Sullivan, being duly sworn according to law deposes and says that, in accordance with authority vested in her by Eric A. Cioppa, Superintendent of Insurance, pursuant to the Insurance Laws of the State of Maine, she has made an examination of the condition and affairs of the

STARMOUNT LIFE INSURANCE COMPANY

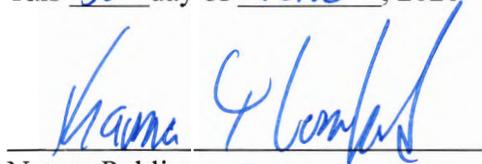
located in Portland, Maine as of December 31, 2018, and that the foregoing report of examination subscribed to by her is true to the best of her knowledge and belief. Noble Consulting Services, Inc., under contract with the Maine Bureau of Insurance, performed the examination. The following examiners from the Maine Bureau of Insurance assisted:

Arias Wan, CPA, CFE
Audrey L. Wade, CFE, CISA
Jeremy C. Finch
Erin L. Gaddis



Vanessa J. Sullivan, CFE

Subscribed and sworn to before me
This 30 day of June, 2020



Notary Public

My Commission Expires: June 12, 2023

KARMA LOMBARD
Notary Public, Maine
My Commission Expires June 12, 2023