REPORT ON EXAMINATION AS TO THE CONDITION OF UKRAINIAN NATIONAL ASSOCIATION 2200 STATE ROUTE 10, PARSIPPANY, NEW JERSEY 07054

NAIC ASSOCIATION CODE 57215

AT DECEMBER 31, 2021

FILED

MAY 23, 2023

COMMISSIONER
NEW JERSEY
DEPARTMENT
OF
BANKING AND INSURANCE

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PHIL MURPHY
Governor

SHEILA OLIVER Lt. Governor



Marlene Caride Commissioner

State of New Jersey

DEPARTMENT OF BANKING AND INSURANCE OFFICE OF SOLVENCY REGULATION

PO BOX 325 TRENTON, NJ 08625-0325

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> > May 22, 2023

Honorable Marlene Caride Commissioner of Banking and Insurance State of New Jersey 20 West State Street Trenton, New Jersey 08625

Commissioner:

In accordance with the authority vested in you by the provisions of **N.J.S.A.** 17:23-22, a financial examination has been made of the assets and liabilities, methods of conducting business and all other affairs of the:

UKRAINIAN NATIONAL ASSOCIATION 2200 ROUTE 10 PARSIPPANY, NJ 07054 N.A.I.C. ASSOCIATION CODE 57215

an insurer authorized to transact business in the State of New Jersey, and herein referred to in this report as "Association."

SCOPE OF EXAMINATION

The New Jersey Commissioner of Banking and Insurance called this Examination in compliance with the requirements of N.J.S.A. 17:23-22. The examination was a full scope comprehensive examination and was conducted at the Association's home office located at 2200 Route 10, Parsippany, New Jersey 07054. The examination was conducted using the risk-focused examination approach and addressed the four-year period from December 31, 2017 the date of the last Financial Condition Examination through December 31, 2021. The conduct of the examination was governed in accordance with the procedures of the National Association

of Insurance Commissioners ("NAIC") and followed regulatory procedures prescribed or objectives of this examination are indicated below:

- Analyze business risk activities focusing on examination procedures in those areas deemed to have greater risk to the Association's overall operations identifying significant operating issues and/or deviations from statutory accounting practices that affect solvency assessment.
- Identify significant deviations from New Jersey insurance laws, regulations and department directives.
- To comply with the standards prescribed in the revised NAIC Financial Condition Examiners Handbook, NAIC accreditation/codification standards and procedures and NJDOBI Departmental policies and procedures.
- To identify and report significant operational and internal control deficiencies and assess the Association's risk management processes.
- Assess the quality and reliability of corporate governance to identify, assess and manage the risk environment facing the insurer to identify current or prospective risk areas.
- To assess the risks that the Association's surplus is not materially misstated.
- To provide a foundation for a profile of the Association's operations, risks and results to be utilized by regulatory authorities.
- Substantive procedures were completed on certain risks based upon the adequacy of controls, risk mitigation strategies and materiality of the risks. Additional substantive procedures were performed as required by the NJDOBI.

A review was made of the following matters to ascertain the Association's financial condition and its conformity with the insurance laws and incorporated as part of the written report and or made part of the examination work papers:

History
Territory and Plan of Operation
Policy Forms and Underwriting Practices
Management and Control
Corporate Records
Policy on Conflict of Interest
Holding Association System
Fidelity Bond and Other Insurance Coverages
Reinsurance
Treatment of Policyholder

No market conduct examination activities were undertaken during the examination period.

This report is confined to financial statements, assessment of risks and comments on matters that involve departures from law, regulations, rules or any other matters, which are deemed to require special explanation or description.

Pursuant to N.J.A.C. 11:2-26.4 an annual audit was performed by the CPA firm of Ansel and Slotopolsky, LLP and an audited financial CPA report was filed with the NJDOBI.

COMPLIANCE WITH PRIOR EXAMINATION REPORT RECOMMENDATIONS

Continuity of Operations

It was recommended in the prior examination report that the Company perform disaster recovery tests for all of the financially significant applications and that the Disaster Recovery Plan be updated with the results of each disaster recovery test. The Company complied with this recommendation.

COMPANY HISTORY

The Association, a fraternal benefit society, has issued no capital stock, like a mutual insurance Association, and is essentially owned by its policyholders. The Association is licensed and writes business in 15 states and six (6) Canadian provinces.

The Association was founded February 22, 1894, and officially approved April 21, 1898 under an Act of the Legislature of the State of New Jersey, entitled "An Act to Incorporate Associations Not for Pecuniary Profit." The original Certificate of Incorporation of the Association dated February 21, 1907 was filed in the office of the Secretary of the State on February 26, 1907. The Certificate of Incorporation was amended on June 2, 1998 to change the home office of the Association from Jersey City, New Jersey to Parsippany, New Jersey. The Association is a not for profit organization exempt from federal income taxes under Internal Revenue Code Section 501(c)(8).

The Certificate of Incorporation states the purposes and objectives of the Ukrainian National are to promote unity, social relations and to diffuse principles of benevolence and charity among Ukrainians. It further states it shall be the purpose and object of the corporation to provide a fund for relief of disabled and destitute members, their families and dependents, and to contract with members to pay funeral expenses, death benefits, endowment benefits, annuity benefits and such other forms of insurance benefits that are legal for a fraternal association to issue.

TERRITORY AND PLAN OPERATION

The Association writes a variety of life insurance products for its 22,756 policy holders, including whole life, term, annuities and endowments, and accidental death and dismemberment. In addition to the financial service products offered, the Association provides other fraternal benefits to members which includes publication of English and Ukrainian language newspapers.

The Association's main administrative office, headquartered in Parsippany, New Jersey, operates as a full-service facility providing underwriting, claims, customer service and management functions. In producing business, the Association utilizes the services of licensed agents, consisting of a number of home office employees, branch secretaries, professional independent agents and organizers at the Association's 111 branches. Five (5) of those agents are employed by the Association. The Association operates as a not-for-profit, tax-exempt organization and, accordingly, files the appropriate Form 990 "Return of Organization Exempt From Income Tax" under Internal Revenue Service Code Section 501(c)(8)."

POLICY FORMS AND UNDERWRITNG PRACTICES

The Association operates under an underwriting guidelines and instructional manual. As stated in the manual, the Association's policy is geared to attract only clients that have a good past performance record and that show a large degree of financial stability. The Association's underwriting manual details steps to be taken so that it only attracts insureds that meet this criterion. In general, and in part the underwriting procedures and requirements are as follows:

- 1. The underwriter will compile an individual profile of the contractor.
- 2. The Association obtains annual audited financial statements from the past three (3) years of the contractor to whom the surety bond is to be written.
- 3. The underwriter is presented with key financial ratios to be applied against the contractor's financial statements for the prior three (3) years. The ratios are meant to verify that the contractor is solvent, profitable and liquid.
- 4. The security pledged as collateral to secure the bond is verified and all the proper documentation necessary to protect the interests of the Association are obtained.
- 5. CPA prepared business financial statements.

6. Clean personal and business credit history. All the policy forms issued by the Association are non-participating.

MANAGEMENT & CONTROL

General Assembly

The governing body as of December 31, 2021 consisted of delegates from each subordinate assembly, for the purpose of continuing the business and fraternal affairs of the Association in accordance with the guidelines established in the official constitution and by-laws.

- 1. The Convention
- 2. General Assembly
- 3. Executive Committee
- 4. Audit Committee

The Convention

General Assembly

The executive powers of the Association are vested in the General Assembly, except otherwise specifically provided in the by-laws along with power to implement the objectives of the Association by a majority vote. During the recess of the General Assembly, the Association maintains an Executive Committee of six (6) members to manage the day-to-day operations. In addition, the Association maintains an Audit Committee comprised of three (3) members whose duties shall be to audit the books and records and to inspect real and personal properties of the Association as often as it shall deem necessary but at least' once a year.

The members with principal occupation elected to the General Assembly at the annual convention held on the week of May 15, 2018, and serving at December 31, 2021, were as follows:

<u>Name</u> <u>Principal Occupation</u>
Olya Czerkas Retired Teacher

St. Petersburg, FL

Nicholas Fil Retired Sr. Designer

Latham, NY

Gloria Horbaty Retired Sales Consultant,

Wallingford, CT Hospitality

Irene Jarosewich Former Editor of the Ukrainian

Passaic NJ Newspaper Svoboda

Andrij V.R. Szul, Esq. Attorney

West Rockhill, PA

Oksana Koziak Retired

Bethlehem, PA

Luba Walchuk Chair, Surity Specialist for Chubb and Son with experience

in financial statements and

analysts

Michael Luciw Retired

Lehighton, PA

Andrij Skyba Audit Committee member,

Harwood Heights, IL Association

Julian Pishko Consultant Self Employed

Minneapolis, MN

George Fedoruczuk Audit work for the state of

Philadelphia, PA Pennsylvania

Bohdana Puzyk Homemaker

Osprey, FL

Oksana Stanko Life Insurance and Annuities

Basking Ridge, NJ Sales Person

Lubov Streletsky Office Manager, PA License in Philadelphia, PA Surance Agenr RN by Profession

The following is a listing of committees and its members serving the Company at December 31, 2021.

Executive Committee Title

Stefan Kaczaraj, CPA Chief Executive Officer and /President

Yuriy Symczyk, Chief Operating Officer

Roma Lisovich, Chief Financial Officer and /Treasurer

Gerald Tysiak, Retired Financial Consultant Eugene Serba, Retired Health Administrator

Eugen Osidacz, Retired Community Development Director, Director of Canada

Auditing Committee Title

Luba Walchuk, Chair Surety Specialist for Chubb and Son

Andru Skyba, Audit Committee member

George Fedoruczuk Audit work for state of Pennsylvania

Officers

Any member in good standing of the Association, over the age of 21, possessing the qualifications of a delegate as prescribed in the by-laws, shall be eligible for any office in the General Assembly. Employees of the Association can only run for the full time paid executive positions; provided, however, that no person shall be eligible to any office of the Association, nor shall such person hold office, who believes in, advocates, teaches, or practices, or is a member of any organization or group that believes in, advocates or teaches the overthrow by force or violence or subversion of the government of which he is a citizen.

The elected officers of the Association serving at December 31, 2021, were as follows:

<u>Officer</u> <u>Title</u>

Stefan Kaczaraj, CPA Chief Executive Officer and President

Gerald Tysiak

Eugene Serba

Eugene Osidacz

Yuriy Symczyk

1st Vice President

2nd Vice President

Director for Canada

Chief Operating Officer

Roma Lisovich Chief Financial Officer and Treasurer

Significant subsequent events and changes to the General Assembly and committees identified by the examiners for the period from December 31, 2021 through the date of this examination report are discussed in the Subsequent Events section of this report.

CORPORATE RECORDS

A review of the minutes of the Company's board and committee meetings indicated that transactions and events were adequately authorized and supported, in accordance with the provisions of the on by-laws.

POLICY ON CONFLICTS OF INTEREST

The Association as part of its by-laws maintains a policy statement on conflicts of interest. Each year members of the Board, officers and key employees of the Association are required to complete a formal conflict of interest questionnaire, which requires the individual to disclose any act or affiliation that is likely to conflict with the individual's official duties. A review of the conflict of interest questionnaires for the examination period did not disclose the existence of any conflicts or irregularities.

HOLDING ASSOCIATION SYSTEM

The Association is not part of a Holding Association System. The Association is not directly or indirectly owned or controlled by any other company, corporation, group of companies, partnership or individual. The Association owns 100% of the Ukrainian National Urban Renewal Corp. (UNURC- inactive), a real estate development Association, which is inactive.

FIDELITY BOND AND OTHER INSURANCE COVERAGES

At December 31, 2021, the Association maintained an insurance program designed to protect its assets arising out of property and liability risks. Coverage includes property insurance, liability for employment practices, and directors' and officers' liability.

The Association maintained a fidelity bond in the amount of \$2,000,000 single loss limit and \$4,000,000 aggregate limit. A review of the NAIC requirement guidelines for minimum amount of fidelity insurance indicated that the Association is adequately protected.

REINSURANCE

In the normal course of business, the Association seeks to reduce the loss that may arise from catastrophic or other events that cause unfavorable underwriting results by reinsuring certain levels of risk in various areas of exposure with other insurance enterprises or reinsurers. Amounts recoverable from reinsurers are estimated in a manner consistent with the claim liability associated with the reinsured policy.

Assumed Reinsurance

The Association does not have assumed reinsurance.

Ceded Reinsurance

As of December 31, 2021, the Association had in effect an Excess of Loss Yearly Renewable Term Reinsurance agreement with Swiss Re Life & Health. The agreement provides coverage for retention in excess of \$100,000 on permanent life insurance and 10-year and 20-year term and a maximum of \$100,000 for ADD riders. These policies were issued in accordance with the Association's usual underwriting standards and requirements for individually selected risks.

The agreement also provides for the Association to apply for facultative reinsurance for risks not otherwise covered on any automatic basis, as well as on an individual risk-by-risk basis when a risk is not eligible for automatic cession.

CONTINUITY OF OPERATIONS

During the examination a review was conducted and determined that the Association has a Disaster Recovery/Business Contingency Plan in place, which was last updated in October 2021 and tested the same year. The plan maintains procedures and processes required to restore critical systems and functions in the event of a disaster to continue its business operations.

TREATMENT OF POLICYHOLDERS

The review of the Association's complaint log indicated that the Association maintains its complaint log in accordance with N.J.S.A. 17:29B-4(10).

FINANCIAL STATEMENTS

Financial statements as reported by the Association are listed below:

- Exhibit A Statement of Financial Position as of December 31, 2021
- Exhibit B Statement of Operating Results for the Four Year Period Ended December 31, 2021
- Exhibit C Capital and Surplus Account for the Four Year Period Ended December 31, 2021

Statement of Financial Position at December 31, 2021

Exhbit A

| | | Current | | Balance per | | |
|--|-----|------------------------|----|------------------------|-------------|-------------|
| | | Examination | | Association | Examination | |
| ASSETS: | | at 12/31/21 | | at 12/31/21 | Change | <u>Note</u> |
| | | | | | | |
| Bonds | \$ | 160,664,965 | \$ | 160,664,965 | \$ 6 0 | 1 |
| Preferred Stocks | | 1,500,000 | | 1,500,000 | 0 | 1 |
| Common Stocks | | 41,301 | | 41,301 | 0 | 1 |
| Mortgage Loans on Real Estate Cash, Cash Equivalents & Short-term investments | | 4,936,598 9,395,104 | | 4,936,598 9,395,104 | 0 | |
| | | | | | | |
| Contract Loans | | 115,502 | | 115,502 | 0 | |
| Investment income Due and Accrued Uncollected Premiums and Agents' | | 2,027,496 | | 2,027,496 | 0 | |
| Balances in Course of collection Electronic Data Processing Equipment and | | 6,419 | | 6,419 | 0 | |
| Software | _ | 263,286 | | 263,286 | 0 | |
| Total Assets | \$_ | 178,950,671 | \$ | 178,950,671 | \$ 5 0 | |
| | | | | | | |
| <u>LIABILITIES</u> : | | | | | | |
| Aggregate Reserve for Life Contracts | \$ | 160,763,220 | \$ | 160,763,220 | \$ 6 0 | 2 |
| Liability for Deposit-type Contracts | | 686,781 | | 686,781 | 0 | 2 |
| Contract Claims: Life Premiums and Annuity Considerations for Life and Accident and Health Contracts | | 943,540 | | 943,540 | 0 | 2 |
| Received in Advance Contract Liabilities not included | | 662,754 | | 662,754 | 0 | |
| Elsewhere: Interest Maintenance Reserve Commissions to Agents Due or Accrued: | | 1,365,615 | | 1,365,615 | 0 | |
| Life and Annuity Contracts | | 50,886 | | 50,886 | 0 | |
| General Expenses Due or Accrued | | 96,811 | | 96,811 | 0 | |
| Taxes, Licenses and Fees | | 49,770 | | 49,770 | 0 | |
| Unearned Investment Income | | 49 | | 49 | 0 | |
| Net Adjustments in Assets and Liabilities due to Foreign Exchange Rates Miscellaneous Liabilities: Asset Valuation | | 624,276 | | 624,276 | | |
| Reserve Miscellaneous Liabilities: Drafts | | 1,316,816 | | 1,316,816 | 0 | |
| Outstanding | | 676 | | 676 | 0 | |
| Aggregate Write-Ins for Liabilities | _ | 715,669 | | 715,669 | 0 | |
| Total Liabilities | | 167,276,863 | | 167,276,863 | 0 | |
| <u>CAPITAL AND SURPLUS</u> : | | | | | | |
| Unassigned Funds (surplus) | | 11,673,807 | | 11,673,807 | \$ 0 | 3 |
| Surplus as regards policyholders | | 11,673,807 | - | 11,673,807 | 0 | |
| Total Liabilities and Surplus and Other Funds | | 178,950,671 | = | 178,950,671 | 0 | |

| Statement of Operating Results for the Four-Year Period Ended December 31, 2021 | | | | | |
|---|--------------|--------------|---------------|--------------|-------------------|
| | <u>2018</u> | <u>2019</u> | <u>2020</u> | <u>2021</u> | |
| <u>Underwriting Income:</u> | | | | | |
| Premiums and Annuity for Life and Accident and Health Contracts | \$4,245,588 | \$3,578,091 | \$7,901,921 | \$12,973,499 | |
| Net Investment Income | \$8,919,914 | \$8,378,925 | \$8,005,427 | \$8,090,660 | |
| Amortization of Interest Maintenance Reserve | \$105,726 | \$105,964 | \$133,368 | \$201,072 | |
| Aggregate Write-ins for Miscellaneous Income | \$312,388 | \$306,220 | \$40,750 | \$0 | |
| Totals | \$13,583,616 | \$12,369,200 | \$16,081,466 | \$21,265,231 | _ |
| | | | | | |
| Death Benefits | 1,157,682 | 768,125 | 1,134,344 | 1,214,953 | |
| Matured Endowments (Excluding Guaranteed Annual Pure | | | | | |
| Endowments) | 685,148 | 544,192 | 644,709 | 474,864 | |
| Annuity Benefits | 14,448,365 | 12,410,159 | 13,980,329 | 8,549,750 | |
| Disability Benefits and Benefits under Accident Health Contracts, Including Premiums Waived | 0 | 0 | 0 | 0 | |
| Surrender Benefits and Withdrawals for Life Contracts | 355,441 | 267,927 | 235,566 | 353,519 | |
| Interest and Adjustments on Contract or Deposit-type Contract Funds | 104,589 | 161,009 | 97,656 | 122,522 | |
| Payments of Supplementary Contracts with Life Contingencies | 50,660 | 40,060 | 41,864 | 40,984 | |
| Increase in Aggregate Reserve for Life and Accident and Health | | | | | |
| Contracts | (6,780,349) | (5,334,395) | (\$3,303,597) | 7,098,729 | _ |
| Total Underwriting Deductions | 10,021,536 | 8,857,077 | 12,830,781 | 17,855,321 | _ |
| Commissions on Premiums, Annuity Consideration and Deposit- type Contract Fund | 136,321 | 127,272 | 244,530 | 391,484 | |
| General Insurance Expenses and Fraternal Expenses | 2,562,896 | 2,610,525 | 2,519,632 | 2,479,668 | |
| Insurance, Taxes, Licenses and Fees | 195,888 | 96,518 | 96,572 | 112,677 | |
| Increase in Loading on Deferred | , | , | , | , | |
| and Uncollected Premium | 260 | 260 | 0 | 0 | |
| Aggregate Write-ins for Deductions | 337,347 | 349,800 | 3,904 | 131,436 | _ |
| Total Expenses Not Gain from Operations and | 13,254,248 | 12,041,452 | 15695464 | 20,970,586 | _ |
| Net Gain from Operations and Before Realized Capital Gains | 329,368 | 327,748 | 386,002 | 294,645 | |
| Net Realized Capital Gain (Losses) Less Capital Gains Tax | 11 | 0 | (16,381) | (158,687) | |
| Net Income | 329,379 | 327,748 | 369,621 | 135,958 | - - |

| Capital and Surplus Account for the Four-Year Period Ended December 31, 2021 <u>Exhibit C</u> | | | | | | | |
|---|-------------|-------------|-------------|----------------|--|--|--|
| | <u>2018</u> | <u>2019</u> | <u>2020</u> | <u>2021</u> | | | |
| Surplus as Regards Policyholders, December 31, Previous Year | 10,627,674 | 11,021,229 | 11,287,271 | 1,369,547 | | | |
| Net Income from Operations | 329,379 | 327,748 | 369,621 | 135,958 | | | |
| Change in Net Unrealized Capital Gains (Losses) | 0 | 0 | (374,540) | 173,601 | | | |
| Change in Net Unrealized Foreign Exchange Capital Gain (Loss) | (21,074) | 107,511 | 75,026 | (6,388) | | | |
| Change in Non-Admitted Assets | 1,032 | (70) | 747 | 3,157 | | | |
| Change in Asset Valuation Reserve | 84,218 | (169,147) | 11,422 | (2,068) | | | |
| Net Change in Surplus for the Year | 393,555 | 266,042 | 82,276 | <u>304,260</u> | | | |
| Surplus as Regards Policyholders: December 31 Current Year | 11,021,229 | 11,287,271 | 11,369,547 | 11,673,807 | | | |

NOTES TO THE FINANCIAL STATEMENTS

NOTE 1 – BONDS AND STOCKS

At December 31, 2021, the Association reported bonds of \$160,664,965, Preferred stocks of \$1,500,000 and Common stocks of \$41,301.

NOTE 2 - LOSS AND LOSS ADJUSTMENT EXPENSES

At December 31, 2021, the Association reported a net liability for Aggregate Reserve for Life Contracts of \$160,763,220 and Liability for Deposit –type Contracts of \$686,781 and Contract Claims: Life of \$943,540.

The Company's outside opining actuary reviewed the Company's loss reserves and actuarial liabilities and the examination actuarial consultants determined the recorded amounts were reasonably stated. The Life and Health Actuarial Division of the NJDOBI reviewed the final report regarding the actuarial examination of the Company's loss and loss adjustment expense reserves as of December 31, 2021 and accepted the reported reserves without adjustment.

NOTE 3 – <u>SURPLUS AS REGARDS POLICYHOLDERS</u>

A summary of the Surplus as Regards Policyholders is detailed below:

| Common Capital Stock | \$ | 0 |
|--|-----------------|-------|
| Gross Paid in and Contributed Surplus | | 0 |
| Unassigned Funds | <u>11,67</u> | 3,807 |
| Total Surplus as Regards Policyholders | \$ <u>11,67</u> | 3,807 |

The Surplus as Regards Policyholders as determined by this examination amounted to \$11,673,807 and meets the minimum needed surplus requirement.

SUBSEQUENT EVENTS

The Association drafted new By-Laws that conform to the NAIC Corporate Governance Annual Disclosure ("NAIC CGAD") requirements. New By-Laws were adopted on January 21, 2020, but not in effect until May 14, 2022 at the 2022 Convention. The 2022 Convention was the first convention subsequent to the January 21, 2020 adoption of the new By-Laws. All changes took place as of July 1, 2022. Due to the new By-Laws, the corporate organizational structure was revised to meet the NAIC CGAD requirements. The structure of the Association leadership and committees were revised, along with the New By-Laws as follows:

The Convention

General Assembly

- Corporate Board of Directors ("CBD")
- Audit Committee ("AC")
- Fraternal Advisory Board ("FAB")
- Honorary Members

The CBD is composed of six (6) Directors, the three (3) Executive Officers – the President/CEO, the COO/National Secretary and the CFO/Treasurer – and the Immediate Past President (IPP). Between Conventions, the CBD is the highest governing body of the Association. The current CBD assumed its responsibilities on July 1, 2022 and is required to meet "at least six (6) times annually"

- The Executive Officers are full-time employees of the Association, each being a professional in his respective field, and serve as the executive management of the Association. They are voting Directors on the CBD.
- The Immediate Past President serves on the CBD in an advisory capacity

The AC is composed of three (3) Auditors. The current AC assumed its responsibilities on July 1, 2022 and is required to meet at least quarterly.

The FAB is comprised of six (6) Advisors, plus one (1) Director. The current FAB assumed its responsibilities on July 1, 2022 and the FAB is required to meet at least twice a year.

Honorary Members are those who held an office on the General Assembly for an aggregate of 20 years or more and were honored with that designation upon a vote by the Convention.

As an entity, the Executive Committee ceased to exist on July 1, 2022 and was replaced by the Corporate Board of Directors.

Subsequent to December 31, 2021 the following members were elected.

Corporate Board of Directors

Bohdana Puzyk, Recording Secretary Andrij Cade, Director George Kuritza, Director Ewhen Osidacz, Director Eugene Serba, Director Stefan Kaczaraj, Immediate Past President Romana Hadzewycz, Chair

Audit Committee:

Walt Syzonenko Roman Stelmach Andrij Skyba

Officers

Roman B. Hirniak, President/CEO Steven Woch, COO/National Secretary David Miller, CFO/Treasurer

CONCLUSION

The examination of the Association as of December 31, 2021 was conducted under the supervision of the State of New Jersey, Department of Banking and Insurance, by the undersigned.

The examination was conducted remotely. The courteous assistance and cooperation of the Association's management is acknowledged.

Respectfully Submitted,

Lori Ruggiero, CFE, CIE, MCM

Examiner-in-Charge

The NOVO Consultant Group, LLC

Representing the New Jersey Department of Banking and Insurance

Under the Supervision of

Nancy Lee Chice

Nancy Lee Chice, CFE

CFE Reviewer - Supervising Examination

New Jersey Department of Banking and Insurance

AFFIDAVIT

I, Lori Ruggiero, do solemnly swear that the foregoing report of examination is hereby represented to be a full and true statement of the condition and affairs of the subject insurer as of December 31, 2021, to the best of my information, knowledge, and belief.

> Lori Ruggiero, FE, CIE, MCM Examiner-in-Charge The NOVO Consultant Group, LLC Representing the New Jersey Department of Banking and Insurance

Under the Supervision of,

Nancy Lee Chice

Nancy Lee Chice, CFE

CFE Reviewer - Supervising Examination New Jersey Department of Banking and Insurance

State of New Jersey County of Mercer

Subscribed and sworn to before me, Sheila M. Thacs

this 17th day of May

Notary Public of New Jersey

My commission expires: