EXAMINATION REPORT

OF

BERKLEY SPECIALTY INSURANCE COMPANY

AS OF

DECEMBER 31, 2018



Delaware Department of Insurance

REPORT ON EXAMINATION

OF

BERKLEY SPECIALTY INSURANCE COMPANY

AS OF

DECEMBER 31, 2018

The above-captioned report was completed by examiners of the Delaware Department of Insurance.

Consideration has been duly given to the comments, conclusions and recommendations of the examiners regarding the status of the company as reflected in the report.

This report is hereby accepted, adopted and filed as an official record of this Department.

Trinidad Navarro Insurance Commissioner

TABLE OF CONTENTS

SCOPE OF EXAMINATION	1
SUMMARY OF SIGNIFICANT FINDINGS	4
COMPANY HISTORY	4
Capitalization	4
DIVIDENDS	5
MANAGEMENT AND CONTROL	5
Directors	5
Officers	5
CORPORATE RECORDS	6
Insurance Holding Company System	6
AGREEMENTS WITH AFFILIATES	8
TERRITORY AND PLAN OF OPERATION	9
REINSURANCE	11
FINANCIAL STATEMENTS	12
STATEMENT OF ASSETS	13
STATEMENT OF LIABILITIES AND SURPLUS	14
STATEMENT OF OPERATIONS	15
RECONCILIATION OF CAPITAL AND SURPLUS	16
ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS RESULTING FROM THE	
EXAMINATION	16
COMMENTS ON FINANCIAL STATEMENT ITEMS	16
SUBSEQUENT EVENTS	16
COMPLIANCE WITH PRIOR EXAMINATION RECOMMENDATIONS	17
SUMMARY OF RECOMMENDATIONS	17

Honorable Trinidad Navarro Commissioner of Insurance Delaware Department of Insurance 1351 West North Street Suite 101 Dover, Delaware 19904

Dear Commissioner:

In compliance with instructions and pursuant to statutory provisions contained in Exam Authority No. 19.003, dated May 9, 2019, an examination has been made of the affairs, financial condition, and management of

Berkley Specialty Insurance Company

hereinafter referred to as the Company and incorporated under the laws of the State of Delaware as a stock company with its registered office located at 1209 Orange Street, Wilmington, Delaware. The examination was conducted at the administrative office of the Company located at 475 Steamboat Road, Greenwich, Connecticut. The report of examination thereon is respectfully submitted.

SCOPE OF EXAMINATION

The Delaware Department of Insurance (Department) performed a risk-focused financial examination of the Company. The previous regulatory examination of the Company covered the four-year period from January 1, 2010 through December 31, 2013. This examination will cover the five-year period from January 1, 2014 through December 31, 2018, and encompasses a general review of transactions during the period, the Company's business policies and practices,

as well as management and relevant corporate matters, with a determination of the financial condition of the Company as of December 31, 2018. Transactions subsequent to the examination date were reviewed where deemed necessary.

The examination of the Company was performed as part of the multi-state coordinated examination of the W. R. Berkley Corporation Group (Group) of regulated United States property and casualty insurance companies as of December 31, 2018. Delaware is the lead state for the Group. The Company is an indirect subsidiary of the W. R. Berkley Corporation (WRBC). The examination was conducted concurrently with that of the Company's affiliates. The Companies in the Group and their state of domicile are summarized as follows:

Company Name	NAIC Number	State of Domicile
Acadia Insurance Company	31325	IA
Admiral Indemnity Company	44318	DE
Admiral Insurance Company	24856	DE
American Mining Insurance Company	15911	IA
Berkley Assurance Company	39462	IA
Berkley Insurance Company	32603	DE
Berkley National Insurance Company	38911	IA
Berkley Regional Insurance Company	29580	IA
Berkley Specialty Insurance Company	31295	DE
Carolina Casualty Insurance Company	10510	IA
Clermont Insurance Company	33480	IA
Continental Western Insurance Company	10804	IA
Firemen's Insurance Company of Washington D.	C. 21784	DE
Gemini Insurance Company	10833	DE
Great Divide Insurance Company	25224	ND
Intrepid Insurance Company	10749	IA
Key Risk Insurance Company	10885	IA
Midwest Employers Casualty Company	23612	DE
Nautilus Insurance Company	17370	AZ
Preferred Employers Insurance Company	10900	CA
Riverport Insurance Company	36684	IA
Starnet Insurance Company	40045	IA
Tri-State Insurance Company of Minnesota	31003	IA
Union Insurance Company	25844	IA
Union Standard Lloyds	43435	TX

We conducted our examination in accordance with the *National Association of Insurance Commissioners* (NAIC) *Financial Condition Examiners Handbook* (Handbook) and generally accepted statutory insurance examination standards consistent with the Insurance Code and Regulations of the State of Delaware. The NAIC Handbook requires that we plan and perform the examination to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the company, and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer's surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the riskfocused examination process. This may include assessing significant estimates made by
management and evaluating management's compliance with Statutory Accounting Principles.

The examination does not attest to the fair presentation of the financial statements included
herein. If during the course of the examination an adjustment is identified the impact of such
adjustment will be documented separately following the Company's financial statements.

This examination report includes significant findings of fact, pursuant to the General Corporation Law of the State of Delaware as required by 18 *Del. C.* § 321, along with general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature, are not included within the examination report but separately communicated to other regulators and/or the Company.

During the course of this examination, consideration was given to work performed by the Company's external accounting firm KPMG, LLP (KPMG). Certain auditor work papers of the 2018 KPMG audit of the Company have been incorporated into the work papers of the

examiners and have been utilized in determining the scope, areas of emphasis in conducting the examination, and in the area of risk mitigation and substantive testing.

SUMMARY OF SIGNIFICANT FINDINGS

There were no significant findings or material changes in financial statements as a result of this examination.

COMPANY HISTORY

The Company was incorporated as Acadia Compensation Insurance Company on April 2, 1992, under the laws of the State of Maine, as a wholly-owned subsidiary of Acadia Insurance Company (Acadia), and commenced business on June 18, 1992. On December 31, 1996, the Company name changed to Chesapeake Bay Property and Casualty Insurance Company. On March 31, 2005, Berkley Regional Insurance Company (BRIC) purchased all of the outstanding shares of the Company from Acadia. On April 12, 2005, the Company's name changed to Berkley Regional Specialty Insurance Company. On November 26, 2007, the Company re-domiciled to the State of Delaware. On July 1, 2018, the Company's name changed to Berkley Specialty Insurance Company.

Capitalization

The Company's Certificate of Incorporation authorizes the issuance of 150,000 shares of common stock with a \$30 par value. As of December 31, 2018, the Company had 150,000 common shares issued and outstanding totaling \$4,500,000. All outstanding common shares of the Company are owned by BRIC.

As of December 31, 2018, the Company reported gross paid in and contributed surplus of \$43,021,934.

Dividends

The Company did not pay any dividends during the period covered by this exam.

MANAGEMENT AND CONTROL

Directors

Pursuant to the general Corporation Laws of the State of Delaware, as implemented by the Company's Certificate of Incorporation and bylaws, all corporate powers and its business property and affairs are managed by, or under the direction, of its Board of Directors (Board).

In accordance with the Company's bylaws, the number of Directors shall consist of not less than five members, and may consist of any number of Directors as may later be determined by resolution of the Board. Directors shall be elected annually by the sole stockholder and shall hold office for one year until successors are elected and qualified, or until earlier resignation or removal. The members of the Board, serving as of December 31, 2018, each elected or appointed in accordance with the Company bylaws were as follows:

Name Title

William Robert Berkley, Jr. President

Richard Mark Baio Senior Vice President and Treasurer
Paul James Hancock Senior Vice President and Chief Actuary

Carol Josephine LaPunzina Senior Vice President

Ira Seth Lederman Secretary

Matthew Michael Ricciardi Senior Vice President and Assistant Secretary

James Gerald Shiel Executive Vice President – Investments

Officers

In accordance with its bylaws, officers serving the Company shall be a Chairman of the Board, a President, an Executive Vice President, one or more Senior Vice Presidents, a Secretary, a Treasurer and a Controller. The Board may also elect other such officers as considered necessary for the proper conduct of the business of the Company. The senior

officers, duly appointed in accordance with the bylaws and serving at December 31, 2018, are as follows:

<u>Name</u> <u>Title</u>

William Robert Berkley, Jr. President Ira Seth Lederman Secretary

Richard Mark Baio Senior Vice President and Treasurer
James Gerald Shiel Executive Vice President - Investments
Paul James Hancock Senior Vice President and Chief Actuary

Carol Josephine LaPunzina Senior Vice President

Matthew Michael Ricciardi Senior Vice President and Assistant Secretary

Allison Kenworthy Assistant Treasurer Janet Shemanske Assistant Secretary

Corporate Records

The recorded minutes of the shareholder and Board were reviewed for the period under examination. The recorded minutes of the Board adequately documented its meetings and approval of Company transactions and events including approval of investment transactions in accordance with 18 *Del. C.* §1304. In addition, the review of Company files indicated that written correspondence was submitted to the Department with regards to the changes in officers and directors during the period under examination in compliance with 18 *Del. C.* §4919.

Insurance Holding Company System

The Company is a member of an Insurance Holding Company System as defined under 18 *Del. C.* §5001 of the Delaware Insurance Code. The Company is a wholly-owned subsidiary of BRIC.

An abbreviated organizational chart of the Group holding company system as of December 31, 2018, is as follows (with the percentage control of the subsidiary by the direct parent shown):

	Economic	Voting
Entity [domicile]	<u>Control</u>	<u>Control</u>
William R. Berkley {1}		
W. R. Berkley Corporation [DE] {2}	20.52%	20.52%
Berkley Dean & Company, Inc. [NJ]	100%	100%
Berkley Insurance Services, LLC [DE]	100%	100%
Signet Star Holdings, Inc. [DE]	100%	100%
Berkley Insurance Company [DE]	100%	100%
Admiral Insurance Company [DE]	100%	100%
Admiral Indemnity Company [DE]	100%	100%
Carolina Casualty Insurance Company [IA]	100%	100%
Clermont Insurance Company [IA]	100%	100%
Nautilus Insurance Company [AZ]	100%	100%
Berkley Assurance Company [IA]	100%	100%
Berkley Life and Health Insurance Company [IA]	100%	100%
Berkley National Insurance Company [IA]	100%	100%
Berkley Regional Insurance Company [IA]	100%	100%
Acadia Insurance Company [IA]	100%	100%
American Mining Insurance Company [IA]	100%	100%
Berkley Specialty Insurance Company [DE]	100%	100%
Continental Western Insurance Company [IA]	100%	100%
Firemen's Insurance Company of Washington D.C. [DE]	100%	100%
Tri-State Insurance Company of Minnesota [IA]	100%	100%
Union Insurance Company [IA]	100%	100%
Gemini Insurance Company [DE]	100%	100%
Great Divide Insurance Company [ND]	100%	100%
Intrepid Insurance Company [IA]	100%	100%
Key Risk Insurance Company [IA]	100%	100%
Midwest Employers Casualty Company [DE]	100%	100%
Preferred Employers Insurance Company [CA]	100%	100%
Riverport Insurance Company [IA]	100%	100%
StarNet Insurance Company [IA]	100%	100%

^{1} It was noted in a Securities and Exchange Commission filing that as of December 31, 2018, William R. Berkley beneficially owned or controlled 25,034,263 common shares of WRBC, which is publicly-traded on the New York Stock Exchange under the symbol "WRB". According to the 2018 WRBC Annual Report, there were 121,995,760 outstanding common shares on December 31, 2018. This results in a 20.52% economic interest and 20.52% voting control that William R. Berkley has of WRBC. Consequently, William R. Berkley is considered an ultimate controlling entity of the Company.

^{2} Other than {1} noted above, no other individual or entity owns or controls greater than 10% of WRBC as of December 31, 2018.

Agreements with Affiliates

Tax Allocation Agreement

Effective April 2, 1992, and amended January 1, 1997, and March 2, 2009, the Company and WRBC entered into an affiliated Tax Allocation Agreement. In accordance with the agreement, the Company will participate in WRBC's election to file a consolidated federal income tax return as long as the Company is a member of WRBC. For years where a consolidated federal tax return is filed, WRBC will pay or discharge, or cause to be paid or discharged, the consolidated federal tax liability of WRBC. Taxes are calculated on a separate return basis, and the Company will pay WRBC an amount equal to the federal income tax liability it would have incurred if it had filed on a separate return. Conversely, if the Company's separate return calculation results in a net operating loss, capital losses, deductions, tax credits or similar items, WRBC shall compensate the Company an amount equal to its federal income tax liability calculated on a separate return basis. In accordance with the contract, WRBC and the Company shall each pay its own state and local taxes.

As of December 31, 2013, the agreement remained in effect for all years prior to December 31, 2012. Effective January 1, 2013, the agreement was replaced by the tax provisions stipulated in the affiliated Reinsurance Pooling Agreement. The second amendment, dated July 21, 2016, added Intrepid Insurance Company as a Pool Affiliate.

Investment Advisory Agreement

Effective August 4, 2005, the Company entered into an affiliated Investment Advisory Agreement with Berkley Dean and Company, Inc. (Berkley Dean). In accordance with the agreement, Berkley Dean provides certain investment advisory and management services based

upon criteria, standards and guidelines established by the Company. The Company has ultimate and final authority over decisions and policies on purchases and sales of securities.

TERRITORY AND PLAN OF OPERATION

Territory

As of December 31, 2018, the Company is licensed and authorized on an admitted basis to write insurance in the State of Delaware. In addition, the Company writes surplus lines insurance on an exempt/non-admitted basis in the remaining forty-nine U.S. States and the District of Columbia.

Plan of Operation

The Company operates primarily as a surplus lines facility that complements the core book of business written by BRIC and its other regional subsidiaries. The Company's primary lines of business include preferred, standard and non-standard commercial lines of business currently declined by, unacceptable to or not contemplated by the other regional companies. For year ended December, 31, 2018, the Company's direct written premiums were produced by the following Profit Centers described below: Berkley Aspire; Intrepid Direct; Berkley Life Sciences; Berkley Program Specialists; and Berkley FinSecure.

Berkley Aspire provides excess and surplus lines coverage on a national basis to small and medium-sized insureds with low to moderate insurance risk. Its product lines include general liability, liquor liability and some property and inland marine coverage. It serves a limited distribution channel consisting of select Berkley member company agents.

Intrepid Direct offers business coverages to franchise restaurants and auto repair garages on a direct basis.

Berkley Life Sciences offers a comprehensive spectrum of property, casualty, and specialty products such as professional and management liability to the life sciences industry on a global basis, including both primary and excess liability coverage. It serves pharmaceutical and biotech companies, medical device companies, dietary supplement companies, medical and research related software developers, contract research and manufacturing organizations, research institutions and organizations, and other related businesses.

Berkley Program Specialists is a program management company offering both admitted and non-admitted insurance support on a nationwide basis for commercial casualty and property program administrators with specialized insurance expertise. Its book is built around blocks of homogeneous business, or programs, allowing for efficient processes, effective oversight of existing programs and sound implementation of new programs.

Berkley FinSecure serves the insurance needs of companies in the financial services industry. It offers a comprehensive range of property, casualty, professional liability and specialty lines insurance products. Its Berkley crime division provides crime-related insurance products for commercial organizations, financial institutions and governmental entities.

The Company's direct written premiums by source are as follows:

Source	<u>2018</u>	<u>Percent</u>
Berkley Aspire	\$21,682,752	55.12%
Intrepid Direct Berkley Life Sciences	8,611,744 4,423,912	21.89% 11.25%
Berkley Program Specialists Berkley FinSecure	2,493,679 2,126,794	6.34% 5.41%
All Other Sources Combined	(1,673)	(0.01)%
Total	\$39,337,208	100.00%

The Company's direct written premiums by line of business are as follows:

<u>Line of Business</u>	<u>2017</u>	<u>2018</u>	Percent
Other Liability - Occurrence (line 17.1) Commercial Auto Liability (lines 19.3, 19.4) Commercial Multiple Peril (line 5) All Other Lines of Business Combined	\$13,544,072 3,424,712 6,410,491 3,049,295	\$14,790,651 9,615,888 7,940,692 <u>6,989,977</u>	37.60% 24.44% 20.19% 17.77%
Total	<u>\$26,428,570</u>	\$39,337,208	100.00%

The Company's direct written premiums by jurisdiction are as follows:

<u>Jurisdiction</u>	<u>2017</u>	<u>2018</u>	Percent
California Georgia	\$607,538 584,765	\$3,667,023 2,436,117	9.32% 6.19%
Florida	1,660,502	2,311,043	5.88%
Pennsylvania	1,894,847	1,930,066	4.91%
Texas	453,074	1,594,316	4.05%
All Other Jurisdictions Combined	21,227,844	27,398,643	<u>69.65%</u>
Total	\$26,428,570	\$39,337,208	100.00%

REINSURANCE

The Company reported the following distribution of premiums written for the year ended December 31, 2018:

	<u>2018</u>	% GPW	<u>2013</u>	% GPW
Direct business	\$ 39,337,208	100.0%	\$ 20,631,052	100.0%
Reinsurance assumed from affiliates	-	0.0%	-	0.0%
Reinsurance assumed from non-affiliates	 -	0.0%	-	0.0%
Gross premiums written (GPW)	\$ 39,337,208	100%	\$ 20,631,052	100%
Reinsurance ceded to affiliates	\$ 39,337,208	100.0%	\$ 20,631,052	100.0%
Reinsurance ceded to non-affiliates	-	0.0%	-	0.0%
Total ceded	\$ 39,337,208	100.0%	\$ 20,631,052	100.0%
Net premiums written	\$ -	0.0%	\$ -	0.0%

Ceded Reinsurance Affiliates

Effective January 1, 2013 the Company and several of its affiliates entered into an intercompany pooling agreement. Under the terms of the agreement, the Company and the other pool participants cede 100% of their direct and assumed premiums written to the lead company in the pool Berkley Insurance Company (BIC). During 2018, the Company ceded premiums amounting to \$39,337,208.

FINANCIAL STATEMENTS

The following financial statements, as reported and filed by the Company with the Department, are reflected in the following:

- Statement of Assets and Liabilities as of December 31, 2018
- Statement of Income for the year ended December 31, 2018
- Reconciliation of Capital and Surplus for the Period from the Prior Examination as of December 31, 2013 to December 31, 2018

BERKLEY SPECIALTY INSURANCE COMPANY STATEMENT OF ASSETS AS OF DECEMBER 31, 2018

			No	onadmitted	N	Vet Admitted
	Lec	lger Assets	Assets			Assets
Bonds	\$	53,622,397	\$	-	\$	53,622,397
Cash equivalents		3,404,453				3,404,453
Subtotals, cash and invested assets	\$	57,026,850	\$	-	\$	57,026,850
Investment income due and accrued		464,748		-		464,748
Uncollected premiums and agents' balances		2,666,221		538,805		2,127,416
Deferred premiums		9,178,189		146,622		9,031,567
Current federal and foreign income tax recoverable		568,204		-		568,204
Net deferred tax asset		132,945		-		132,945
Aggregate write-ins for other than invested assets		121,276		25,796		95,480
Total Assets	\$	70,158,433	\$	711,223	\$	69,447,210

BERKLEY SPECIALTY INSURANCE COMPANY STATEMENT OF LIABILITIES AND SURPLUS AS OF DECEMBER 31, 2018

		2018	Note
Losses	\$	-	1
Reinsurance payable on paid losses and loss adjustment expenses		-	
Loss adjustment expenses		-	1
Commissions payable; contingent commissions and other similar charges		273,228	
Other expenses (excluding taxes, licenses and fees)		315,561	
Taxes, licenses, and fees (excluding federal and foreign income tax)		426,154	
Advance Premium		15,229	
Ceded reinsurance premiums payable (net of ceding commissions)		8,568,519	
Payable to parent; subsidiaries and affiliates		1,148,803	
Total liabilities excluding protected cell liabilities	\$	10,747,494	
Total liabilities	\$	10,747,494	
Common capital stock	\$	4,500,000	
Gross paid in and contributed surplus	4	43,021,934	
Unassigned funds (surplus)		11,177,780	
Surplus as regards policyholders	\$:	58,699,714	
Totals of liabilities & surplus	\$	69,447,208	

BERKLEY SPECIALTY INSURANCE COMPANY STATEMENT OF OPERATIONS AS OF DECEMBER 31, 2018

Underwriting Income		<u>2018</u>
Premiums earned	\$	-
Deductions		-
Losses incurred	\$	-
Loss adjustment expenses incurred		-
Other underwriting expenses incurred		
Total underwriting deductions	\$	-
Net underwriting gain (loss)	\$	
Investment Income		
Net investment income earned	\$	1,863,454
Net realized capital gains (losses) less capital gains tax of \$(3,770)		(14,182)
Net investment gain (loss)	\$	1,849,272
Other Income Net gain (loss) from agents' or premium balances charged off (amount		
recovered \$0 amount charged off \$367,334)	\$	(367,334)
Finance and service charges not included in premium		-
Aggregate write-ins for miscellaneous income		367,334
Total other income	\$	-
Net income before dividends to policyholders; after capital gains tax and before all other federal and foreign income taxes Dividends to policyholders	\$	1,849,272
Net income; after dividends to policyholders; after capital gains tax and before all other federal and foreign income taxes Federal and foreign income taxes incurred Net Income	\$	1,849,272 278,836 1,570,436
1 (of life one)	Ψ	1,570,150

RECONCILIATION OF CAPITAL AND SURPLUS For the Period from the Prior Examination As of December 31, 2013 to December 31, 2018

		Common		plus	oss Paid-in and Contributed	1	Unassigned		m . 1
	Ca	apital Stock	No	tes	Surplus		Surplus		Total
12/31/2013	\$	4,500,000	\$	-	\$ 43,021,934	\$	4,090,734		\$ 51,612,668
12/31/2014		-		-	-		1,320,995	(1)	1,320,995
12/31/2015		-		-	-		1,129,795	(1)	1,129,795
12/31/2016		-		-	-		2,172,398	(1)	2,172,398
12/31/2017		-		-	-		1,016,475	(1)	1,016,475
12/31/2018		-		-	-		1,447,384	(1)	1,447,384
	\$	4,500,000	\$	_	\$ 43,021,934	\$	11,177,781		\$ 58,699,715

⁽¹⁾ Represents net income, change in net deferred income tax, change in non-admitted assets, aggregate write-ins for gains and losses in surplus.

ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS RESULTING FROM THE <u>EXAMINATION</u>

There were no changes made to the Financial Statements as a result of this Examination.

COMMENTS ON FINANCIAL STATEMENT ITEMS

Note 1:	
Losses	\$ -0-
Loss Adjustment Expenses	\$ -0-

The examination liability for the aforementioned captioned items of \$0 and \$0 are the same as reported by the Company as of December 31, 2018. The Company cedes 100% of its losses and loss adjustment expenses to its affiliate, BIC. The examination analysis of Loss and Loss Adjustment Expense reserves was conducted in accordance with Generally Accepted Actuarial Principles and Statutory Accounting Principles, including NAIC Accounting Practices and Procedures Manual, Statement of Statutory Accounting Principle No. 55 (SSAP # 55).

SUBSEQUENT EVENTS

During March of 2020, the World experienced a pandemic related to the COVID-19 virus. At the date of this report, the Company has not been able to quantify the effects of this

pandemic on its current or future financial statements. Also, as of the date of this report, the Company was fully operational and was providing services to its policyholder.

There were no other material subsequent events noted.

COMPLIANCE WITH PRIOR EXAMINATION RECOMMENDATIONS

There were no recommendations contained in the prior examination report issued by the Department as of December 31, 2013.

SUMMARY OF RECOMMENDATIONS

There were no recommendations as a result of this examination.

Berkley Specialty Insurance Company

The assistance and cooperation of the consulting actuarial firm, INS Consultants, Inc., the consulting information systems specialist firm, INS Services, Inc., the Company's outside audit firm, KPMG, and the Company's management and staff was appreciated and is acknowledged.

Respectfully submitted,

Greg Taylor, CFE

Co-Examiner In-Charge

Greg Taylor

Inthe C. Caule

State of Delaware

Anthony Cardone, CFE, CPA

Supervising Examiner

State of Delaware

Berkley Specialty Insurance Company

I, Greg Taylor, hereby verify and attest, under penalty of perjury, that the above is a true and correct copy of the examination report and findings submitted to the Delaware Department of Insurance pursuant to examination authority 19.003.

Greg Taylor, CFE