# **EXAMINATION REPORT**

OF

# FIREMEN'S INSURANCE COMPANY OF WASHINGTON D.C.

**AS OF** 

**DECEMBER 31, 2018** 

Office of the Commissioner



Delaware Department of Insurance

#### REPORT ON EXAMINATION

OF

#### FIREMEN'S INSURANCE COMPANY OF WASHINGTON D.C.

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

Dated this \_\_\_\_\_ day of \_\_\_\_\_\_\_\_, 2020

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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. 19.006, dated May 9, 2019, an examination has been made of the affairs, financial condition and management of

#### Firemen's Insurance Company of Washington D.C.

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:

<b>Company Name</b>	NAIC Number	<b>State of Domicile</b>
	21225	<b>.</b> .
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 chartered on March 3, 1837, by a special Act of Congress of the United Stated of America as The President and Directors of the Firemen's Insurance Company of Washington and Georgetown, under the laws of the District of Columbia, and commenced business on August 4, 1837. In July 1957, the Company's name changed to Firemen's Insurance Company of Washington D.C. In 1982, WRBC acquired the Company. In 1994, the Company re-domiciled to Maryland. In 1996, WRBC contributed its ownership of all of the Company's issued and outstanding common stock to Berkley Regional Insurance Company (BRIC). On January 31, 2001, the Company re-domiciled to the State of Delaware.

#### **Capitalization**

The Company's Certificate of Incorporation authorizes the issuance of 100,000 shares of common stock with a \$35 par value. As of December 31, 2018, the Company had 100,000 common shares issued and outstanding totaling \$3,500,000. 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 \$19,717,835.

#### **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:

> Title Name

William Robert Berkley, Jr. President

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

Carol Josephine LaPunzina Senior Vice President

Ira Seth Lederman

Secretary Matthew Michael Ricciardi Senior Vice President and Assistant Secretary

Executive Vice President – Investments James Gerald Shiel

#### 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:

Name Title

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

Bertman Adam Braud, Jr. Assistant Treasurer
Ann Marie Collins Assistant Treasurer
Susan Paula Tingleff Assistant Treasurer

#### 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.

#### <u>Insurance Holding Company System</u>

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 downstream subsidiary by the upstream direct parent shown):

	Economic	Voting
Entity [domicile]	Control	Control
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%

<sup>{1}</sup> 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.

<sup>{2}</sup> 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 1, 1980, and amended September 1, 1989, 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 June 1, 1996, and amended July 24, 1998, 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.

#### Computer Services Agreement

Effective January 14, 2002, the Company entered an affiliated Computer Services Agreement with Berkley Technology Services, LLC (BTS). In accordance with the agreement, BTS provides computer and data processing services to the Company including: programming, network management, operations and consulting services. The agreement authorizes BTS to contract with other service providers to satisfy the needs of the Company at its discretion. Per the agreement, BTS agrees all information disclosed by the Company shall be confidential and shall not be disclosed to any individual, corporation, other business organization or governmental agency unless required by law in conformity with the Company's privacy policy. In addition, BTS agrees to use information only for the purpose for which the Company provided it.

#### 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 forty-eight U.S. States (all except California and Florida) and the District of Columbia.

#### Plan of Operation

The Company is a multiple-line insurance carrier underwriting commercial property and casualty products, and utilizes the independent agency system to distribute its products. For the year ended December, 31, 2018, the Company's direct written premiums were produced by the following Profit Centers described below: Acadia Insurance Group; Continental Western Group;

Berkley Mid-Atlantic Group; Berkley Southeast Insurance Group; Berkley North Pacific Group; and Union Standard Insurance Group.

Acadia Insurance Group is a northeast regional property and casualty underwriter offering a broad portfolio of products exclusively through local independent agents in Connecticut, Maine, Massachusetts, New Hampshire, New York and Vermont. In addition to its general offerings, Acadia Insurance Group has specialized expertise in insuring regional industries such as construction, lumber, fishing and transportation.

Continental Western Group is a midwest regional property and casualty operation based in Des Moines, Iowa, providing underwriting and risk management services to a broad array of regional business in thirteen Midwest states. In addition to its generalist portfolio, Continental Western Group offers specialty underwriting solutions for diversified agriculture, construction, light manufacturing, transportation, volunteer fire departments, rural utilities and public entities.

Berkley Mid-Atlantic Group provides commercial property and casualty coverages to a wide variety of businesses in Delaware, the District of Columbia, Maryland, Ohio, Pennsylvania and Virginia. Focusing on middle market accounts, it complements its standard writings with specialized products in areas such as construction.

Berkley Southeast Insurance Group offers a wide array of commercial lines products in six southeastern states: Alabama, Georgia, Mississippi, North Carolina, South Carolina and Tennessee, specializing in small to mid-sized accounts.

Berkley North Pacific Group provides local underwriting, claims and risk management services in the northwest. It operates with a select group of agents in Idaho, Montana, Oregon, Utah and Washington to sell and service property and casualty policies for larger middle-market standard businesses and specialty lines, such as construction, restaurants and manufacturing.

Union Standard Insurance Group offers preferred commercial property and casualty insurance products and services to a wide range of small to medium-sized commercial entities through independent agents in Arizona, Arkansas, New Mexico, Oklahoma and Texas.

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

Source	<u>2018</u>	Percent
Acadia Insurance Group	\$73,324,790	40.55%
Continental Western Group	40,876,672	22.60%
Berkley Mid-Atlantic Group	23,921,057	13.23%
Berkley Southeast Insurance Group	17,238,561	9.53%
Berkley North Pacific Group	15,581,112	8.62%
Union Standard Insurance Group	9,784,700	5.41%
All Other Sources Combined	<u>110,813</u>	0.06%
Total	<u>\$180,837,706</u>	<u>100.00%</u>

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
Commercial Multiple Peril (line 5) Workers' Compensation (line 16) Commercial Auto Liability (line 19.3, 19.4) All Other Lines of Business Combined	\$65,823,080 59,214,519 32,575,430 <u>21,569,557</u>	\$67,217,737 51,924,826 37,599,442 <u>24,095,701</u>	37.17% 28.71% 20.79% <u>13.33%</u>
Total	\$179,182,586	\$180,837,706	100.00%

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

<u>Jurisdiction</u>	<u>2017</u>	<u>2018</u>	Percent
New Hampshire	\$24,448,186	\$25,998,037	14.38%
Massachusetts	20,280,238	16,990,070	9.40%
Maine	15,436,162	14,072,396	7.78%
Pennsylvania	10,023,883	10,856,537	6.00%
Washington	4,299,366	9,753,397	5.39%
All Other Jurisdictions Combined	104,694,751	103,167,269	<u>57.05%</u>
Total	<u>\$179,182,586</u>	\$180,837,706	100.00%

#### **REINSURANCE**

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

	2018	% GPW	<u>2013</u>	% GPW
Direct business	\$ 180,837,706	98.0%	\$ 187,618,817	98.0%
Reinsurance assumed from affiliates	-	0.0%	-	0.0%
Reinsurance assumed from non-affiliates	3,666,207	2.0%	3,748,980	2.0%
Gross premiums written ("GPW")	\$ 184,503,913	100%	\$ 191,367,797	100%
Reinsurance ceded to affiliates	\$ 184,503,912	100.0%	\$ 191,367,797	100.0%
Reinsurance ceded to non-affiliates		0.0%		0.0%
Total ceded	\$ 184,503,913	100.0%	\$ 191,367,797	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 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 \$184,503,913.

#### Assumed Reinsurance Premiums Non-Affiliates

In 2018 the Company assumed premiums amounting to \$3,666,207 from non-affiliates. The entire premium amount assumed was from mandatory pools, associations and other facilities.

### **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

## FIREMEN'S INSURANCE COMPANY OF WASHINGTON D.C. STATEMENT OF ASSETS AS OF DECEMBER 31, 2018

	Ledger Assets		Nonac	lmitted Assets	Net .	Admitted Assets
Bonds	\$	32,931,830	\$	-	\$	32,931,830
Cash		2,750		-		2,750
Cash equivalents		2,161,121		-		2,161,121
Receivables for securities		46,632		-		46,632
Subtotals, cash and invested assets	\$	35,142,333	\$	-	\$	35,142,333
Investment income due and accrued		227,707		-		227,707
Uncollected premiums and agents' balances		9,175,977		646,983		8,528,994
Deferred premiums		47,745,248		-		47,745,248
Current federal and foreign income tax recoverable		115,246		-		115,246
Net deferred tax asset		202,299		-		202,299
Guaranty funds receivable or on deposit		421,214		-		421,214
Aggregate write-ins for other than invested assets		965,485		-		965,485
Total Assets	\$	93,995,509	\$	646,983	\$	93,348,526

# FIREMEN'S INSURANCE COMPANY OF WASHINGTON D.C. 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		599,488	
Other expenses (excluding taxes, licenses and fees)		357,548	
Taxes, licenses, and fees (excluding federal and foreign income tax)		1,865,719	
Advance Premium		351,451	
Dividends declared and unpaid: Policyholders		3,417,418	
Ceded reinsurance premiums payable (net of ceding commissions)		52,634,293	
Payable to parent; subsidiaries and affiliates		18,844	
Aggregate write-ins for liabilities		150,550	
Total liabilities excluding protected cell liabilities	\$	59,395,311	
Total liabilities	\$	59,395,311	
Common capital stock	\$	3,500,000	
Gross paid in and contributed surplus		19,717,835	
Unassigned funds (surplus)	_	10,735,381	
Surplus as regards policyholders	\$	33,953,216	
Totals of liabilities & surplus	\$	93,348,527	

# FIREMEN'S INSURANCE COMPANY OF WASHINGTON D.C. STATEMENT OF OPERATIONS AS OF DECEMBER 31, 2018

Underwriting Income	2018
Premiums earned	\$ -
Deductions	
Losses incurred	\$ -
Loss adjustment expenses incurred	-
Other underwriting expenses incurred	 
Total underwriting deductions	\$ 
Net underwriting income	\$ 
Investment Income	
Net investment income earned	\$ 981,738
Net realized capital gains (losses) less capital gains tax of \$2,975	 11,192
Net investment gain (loss)	 992,930
Other Income  Net gain (loss) from agents' or premium balances charged off (amount recovered \$0	
amount charged off \$95,601	\$ (95,601)
Finance and service charges not included in premium	-
Aggregate write-ins for miscellaneous income	 95,601
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	\$ 992,930
Net income; after dividends to policyholders; after capital gains tax and before all other	
federal and foreign income taxes	\$ 992,930
Federal and foreign income taxes incurred	 170,235
Net Income	\$ 822,695

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

	Common Capital Stock	Surplu	s Notes	('ontributed		Jnassigned Surplus		Total
12/31/2013	\$3,500,000.00	\$	-	\$ 19,717,835	\$	7,651,388	\$	30,869,223
12/31/2014	-		-	-		774,426	(1)	774,426
12/31/2015	-		-	-		515,847	(1)	515,847
12/31/2016	-		-	-		531,760	(1)	531,760
12/31/2017	-		-	-		467,823	(1)	467,823
12/31/2018						794,135	(1)	794,135
	\$ 3,500,000	\$		\$ 19,717,835	\$	10,735,379	\$	33,953,214

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

# $\frac{\text{ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS RESULTING FROM THE}}{\text{EXAMINATION}}$

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

#### **COMMENTS ON FINANCIAL STATEMENT ITEMS**

<u>Note 1:</u>	
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.

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

nthy C. Caule

Greg Taylor

State of Delaware

Anthony Cardone, CFE, CPA

Supervising Examiner

State of Delaware

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 19.006.

Greg Taylor, CFE