

EXAMINATION REPORT
OF
DL REINSURANCE COMPANY
AS OF
DECEMBER 31, 2023

TRINIDAD NAVARRO
COMMISSIONER



STATE OF DELAWARE
DEPARTMENT OF INSURANCE

REPORT ON EXAMINATION
OF
DL REINSURANCE COMPANY
AS OF
DECEMBER 31, 2023

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 23rd day of June, 2025

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May 29, 2025

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 Examination Certification No. 24.032, dated March 7, 2024, an examination has been made of the affairs, financial condition and management of

DL REINSURANCE COMPANY

hereinafter referred to as DLRC or the Company. The Company was incorporated under the laws of the State of Delaware as a stock company with its registered office located at 1209 Orange Street, Wilmington, Delaware 19801. The administrative offices of the Company are located at 10555 Group 1001 Way, Zionsville, Indiana 46077.

SCOPE OF EXAMINATION

We have performed our single-state examination of the Company. The last examination was conducted as of December 31, 2019, by the Delaware Department of Insurance (Department) and covered the period from January 1, 2016 through December 31, 2019. This examination covers the period of January 1, 2020 through December 31, 2023.

Our examination was performed as part of the coordinated examination of the Group 1001 Insurance Holdings Group of regulated entities (Group 1001) wherein Delaware is the lead state.

Group 1001 operates four business units including Life & Annuity (L&A), Property & Casualty (P&C), Health and Specialty. The examination was conducted concurrently with that of the Company's Delaware domiciled L&A and Specialty affiliates as well as its P&C and Health affiliates domiciled in various states. Each business unit was examined as a standalone subgroup with a unique exam facilitator. To the fullest extent, the efforts, resources, project material and findings were coordinated and made available to all examination participants.

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 risk-focused 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 Laws 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 2023 KPMG audit of the Company, and certain of its affiliates, have been incorporated into the work papers of the examiners. The work papers were 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 under the laws the State of Delaware on October 23, 2014, as a direct subsidiary of Delaware Life Insurance Company (DLIC). DLIC is a wholly owned subsidiary of DLIC Sub-Holdings, LLC (DLSH). DLSH was formed in the first quarter of 2022 as a new holding company subsidiary of DLIC's former direct parent, DLIC Holdings, LLC (DLH). DLH was formerly known as Group One Thousand One, LLC. During 2021, Group 1001, Inc. and Group 1001 Insurance Holdings, LLC (G1001 IH) were formed as part of a corporate reorganization. Group 1001, Inc. was established as the principal holding company and G1001 IH was added as an intermediate holding company to own DLH. Group 1001, Inc. is ultimately controlled by Mark R. Walter.

Group 1001 consists of the following brands: Delaware Life, Gainbridge®, Clear Spring Life and Annuity Company, Clear Spring Property and Casualty Group, Clear Spring Health and the RVI Group, among others. Group 1001's United States domiciled insurance

companies operate in the life and annuity, property and casualty, health and specialty insurance markets.

Capitalization

The Company's Certificate of Incorporation, as amended, authorizes the issue of 3,000 shares of common stock with no par value. As of December 31, 2023, the Company had common shares issued and outstanding totaling \$300,000. All outstanding shares of the Company are owned by DLIC. As of December 31, 2023, the Company reported gross paid in and contributed surplus of \$2,392,522.

Dividends

The Company's Board of Directors (Board) did not approve or authorize any dividends during the examination period.

MANAGEMENT AND CONTROL

Directors

Pursuant to the General Corporation Laws of the State of Delaware, as implemented by the Company's Certificate of Incorporation, as amended, and bylaws, the business and affairs of the Company must be managed by or under the direction of its Board. The Company's bylaws require the Board consist of no less than three members. Further, the directors must be elected at the annual meeting of the shareholders and each director elected shall hold office until his or her successor is duly elected and qualified. As of December 31, 2023, the members of the Board, together with their principal business affiliations, were as follows:

<u>Name</u>	<u>Principal Occupation</u>
Dennis Arthur Cullen Fort Myers, Florida	Retired Former Financial Executive
Curtis Paul Steger Lafayette, Indiana	Retired Former Actuary

Michael Kevin Moran
Bedford, Massachusetts

Retired
Former Chief Accounting Officer

Officers

Officers were elected in accordance with the bylaws during the period under examination. The Company's bylaws require election of a Chief Executive Officer, President, Treasurer and Secretary. The Board may also elect one or more Vice Presidents. All elected officers hold office until his or her successor is elected and qualified or until his or her earlier resignation or removal. Any number of offices may be held by the same person. As of December 31, 2023, the Company's principal officers, together with their respective titles, were as follows:

<u>Name</u>	<u>Title</u>
Daniel J. Towriss	Chief Executive Officer and President
F. Linda Wang	Chief Financial Officer
Michael S. Bloom	Chief Legal Officer and Secretary
John J. Miceli, Jr.	Treasurer
Robert B. Stanton*	Chief Operating Officer
Andrew F. Kenney	Chief Investment Officer
Ellyn M. Nettleton	Chief Accounting Officer

*Officer was changed subsequent to the examination period.

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 as required by 18 *Del. C.* § 1304. In addition, a review of Company files found that written correspondence was submitted to the Department with regard to changes in certain principal officers and directors during the period under examination as required by 18 *Del. C.* § 4919.

Insurance Holding Company System

The Company is a member of an insurance holding company system, known as Group 1001, as defined under 18 *Del. C.* § 5001 (7) of the Delaware Insurance Code. The following is an abbreviated organizational chart of the insurance holding company system as of December 31, 2023:

<u>Company</u>	<u>Domicile</u>	<u>% Own</u>
Mark R. Walter (individual)		
DLICM, LLC	Delaware	100%
TWG Global Holdings, LLC	Delaware	72.92%
DLHPH Equity Participation Company, LLC	Delaware	100%
TWG Global Holdings, LLC	Delaware	27.08%
TWG Financial Holdings, LLC	Delaware	100%
Group 1001, Inc.	Delaware	91.89%
Group 1001 Capital, LLC	Delaware	100%
Evolution of Sports, Inc.	Delaware	82.76%
Group 1001 Finance Company, LLC	Delaware	100%
Group 1001 Investment Holdings, LLC	Delaware	100%
Group 1001 Equity Holdings, LLC	Delaware	100%
Group 1001 Insurance Holdings, LLC	Delaware	100%
DLIC Holdings, LLC	Delaware	100%
DLIC Sub-Holdings, LLC	Delaware	100%
Delaware Life Insurance Company	Delaware	100%
DL Reinsurance Company	Delaware	100%
Delaware Life and Annuity Company	Delaware	100%
Delaware Life Reinsurance (U.S.) Corp.	Oklahoma	100%
Clarendon Insurance Agency, Inc.	Massachusetts	100%
Ellendale Insurance Agency, LLC	Delaware	100%
EDIA Funding I, LLC	Delaware	100%
EDIA Funding III, LLC	Delaware	100%
EDIA Funding IV, LLC	Delaware	100%
EDL Holdings, LLC	Delaware	100%
ELND Collateral Company II, LLC	Delaware	100%
EDIA Funding II, LLC	Delaware	100%
EDL Holdings II, LLC	Delaware	100%
ELND Collateral Company Parent, LLC	Delaware	100%
Delaware Life 1099 Reporting Company, LLC	Delaware	100%
DLIC Real Estate, LLC	Delaware	100%
DL Investment Holdings 2016-1, LLC	Delaware	100%
DL Investment Holdings 2016-2, LLC	Delaware	100%
DL Private Placement Investment Company I, LLC	Delaware	100%
DL Service Holdings, LLC	Alaska	100%
IDF IX, LLC	Delaware	100%
McMillan Street, LLC	Delaware	100%

<u>Company</u>	<u>Domicile</u>	<u>% Own</u>
NCS Franklin Park, LLC	Delaware	100%
Clear Spring PC Holdings, LLC	Delaware	100%
Clear Spring PC Acquisition Corp.	Delaware	100%
Clear Spring Property and Casualty Company	Indiana	100%
Clear Spring Casualty Insurance Company	Indiana	100%
Clear Spring National Insurance Company	Indiana	100%
Clear Spring American Insurance Company	Indiana	100%
Delaware Life Reinsurance (Barbados) Corp.	Barbados	100%
Clear Spring Health Holdings, LLC	Delaware	100%
Clear Spring Health of Illinois, Inc.	Illinois	100%
Eon Health Plan, LLC	Delaware	100%
Clear Spring Health (GA), Inc.	Georgia	100%
Clear Spring Health (SC), Inc.	South Carolina	100%
Clear Spring Health Community Care, Inc.	Illinois	100%
Clear Spring Health (CO), Inc.	Colorado	100%
Clear Spring Health Insurance Company	Arizona	100%
Clear Spring Health (VA), Inc.	Virginia	100%
Clear Spring Health Management Services, LLC	Delaware	100%
Clear Spring Health Administrative Services, LLC	Delaware	100%
Advisor Advantage Marketing, LLC	Delaware	100%
Clear Spring Advisory Services, LLC	Delaware	100%
Healthcare Distribution Partners, LLC	Delaware	100%
Delaware Life Marketing, LLC	Delaware	100%
Daltonville Capital, LLC	Delaware	100%
Danetown Funding, LLC	Delaware	100%
Dansbury Capital, LLC	Delaware	100%
Delta Lane Funding, LLC	Delaware	100%
Dixon Canyon Capital, LLC	Delaware	100%
DLMF1, LLC	Delaware	100%
Dolomites Range Capital, LLC	Delaware	100%
Dovemont Capital, LLC	Delaware	100%
Drawford Holdings, LLC	Delaware	100%
Duststorm Road Capital, LLC	Delaware	100%
Dyewood Forest Capital, LLC	Delaware	100%
Armstrong STF IV, LLC	Delaware	100%
Wright STF III, LLC	Delaware	100%
Delaware Life (Bermuda) Holdings, Inc.	Delaware	100%
CSLIC Holdings, LLC	Delaware	100%
Clear Spring Life and Annuity Company	Delaware	100%
Gainbridge Life Insurance Company	Delaware	100%
Elsmere Insurance Agency, LLC	Delaware	100%
Efland Funding 2015-1, LLC	Delaware	100%

<u>Company</u>	<u>Domicile</u>	<u>% Own</u>
Efland Funding 2015-2, LLC	Delaware	100%
Efland Funding 2015-3, LLC	Delaware	100%
Efland Funding 2015-4, LLC	Delaware	100%
Efland Funding 2016-1, LLC	Delaware	100%
Efland Funding 2016-2, LLC	Delaware	100%
Efland Parent 2015-3, LLC	Delaware	100%
Efland Parent 2016-1, LLC	Delaware	100%
ELSL Funding V, LLC	Delaware	100%
ELSL Funding VI, LLC	Delaware	100%
ELSL Funding VII, LLC	Delaware	100%
Elsmere Renewable Energy, LLC	Delaware	100%
Saganaw Insurance Agency, LLC	Delaware	100%
Saganaw Receivables, LLC	Delaware	100%
CL Investment Holdings 2022-1, LLC	Delaware	100%
GLAC GBM Investco, LLC	Delaware	100%
CSLAC Investment Holdings, LLC	Delaware	100%
CSLAC Investment Holdings II, LLC	Delaware	100%
CSLAC Investment Holdings III, LLC	Delaware	100%
CSLAC Real Estate, LLC	Delaware	100%
Clear Spring Life 1099 Reporting Company, LLC	Delaware	100%
IDF I, LLC	Delaware	100%
IDF II, LLC	Delaware	100%
Paragon GBM Investco, LLC	Delaware	100%
Renewable Energy Investors, LLC	Delaware	100%
Retail Investors III, LLC	Delaware	100%
STFP Aggregator I, LLC	Delaware	100%
STFP Aggregator II, LLC	Delaware	100%
STFP Aggregator III, LLC	Delaware	100%
GL Acquisition Defeasance Co, LLC	Delaware	100%
Clear Spring Life Marketing, LLC	Delaware	100%
Cannonville Funding, LLC	Delaware	100%
Gallahan Funding, LLC	Delaware	100%
Geiger Funding, LLC	Delaware	100%
GLMF1, LLC	Delaware	100%
Grayson Road Capital, LLC	Delaware	100%
Groewood Funding, LLC	Delaware	100%
Group 1001 Distribution Holdings, LLC	Delaware	100%
Gainbridge Insurance Agency, LLC	Delaware	100%
Gainbridge Loyalty Services, LLC	Delaware	100%
Group 1001 Insurance Marketing, LLC	Delaware	100%
Gainbridge Risk Solutions, LLC	Delaware	100%
Gainbridge P&C Services, LLC	Delaware	100%

<u>Company</u>	<u>Domicile</u>	<u>% Own</u>
Vesper Risk, LLC	Delaware	100%
Group 1001 Services, Inc.	Delaware	100%
Group 1001 IP Holdings, LLC	Delaware	100%
Group 1001 IP Properties, LLC	Delaware	100%
Group 1001 IP Lab, LLC	Delaware	100%
Group 1001 IP Development, LLC	Delaware	100%
Group 1001 IP Solutions, LLC	Delaware	100%
AxiaTP Holdings, LLC	Delaware	90%
Axia Technology Partners, LLC	Indiana	100%
DG Telecom, LLC	Indiana	100%
G1001 Innovations Group, LLC	Delaware	100%
G1001 Advisory Resources, LLC	Delaware	100%
PSA Realty Company	Pennsylvania	100%
Group 1001 Indiana Holdings, LLC	Indiana	100%
Group 1001 Portfolio Services, LLC	Delaware	100%
Group 1001 Resources, LLC	Delaware	100%
R.V.I. Manager, LLC	Delaware	100%
R.V.I. Holdings, LLC	Delaware	100%
R.V.I. Acquisition Holdings, LLC	Delaware	100%
R.V.I. Guaranty Co., Ltd.	Bermuda	100%
R.V.I. America Corporation	Delaware	100%
R.V.I. America Insurance Company	Delaware	100%
7109 Harvard Avenue, LLC	Ohio	100%
RVI Analytical Services, Inc.	Delaware	100%
R.V.I. Services Co., Inc.	Connecticut	100%
Transition Services, Inc.	Delaware	100%
Group One Thousand One Advisory Services, LLC	Delaware	100%
Insurance Management Services, LLC	Delaware	100%

Agreements with Affiliates

The following is a summary of the Company's significant affiliated agreements (excluding reinsurance agreements) that were in effect as of December 31, 2023:

Administrative Services Agreement

- Effective December 22, 2014, the Company entered into an Administrative Services Agreement with DLIC, pursuant to which DLIC provides various services and the use of property, equipment and facilities. Services include contract and general administrative services, accounting data processing, tax and audit services and functional support services.

Tax Sharing Agreement

- Effective December 15, 2014, as amended effective October 14, 2020 and September 1, 2023, the Company is party to a Tax Sharing Agreement between and among Group 1001, Inc. and certain of its subsidiaries.

TERRITORY AND PLAN OF OPERATION

The Company is licensed only in the State of Delaware and is authorized to transact the business of life insurance, including variable life, annuities and variable annuities. As of December 31, 2023, the Company's only business was a reinsurance agreement with DLIC, whereby it reinsures certain variable annuity risks from DLIC.

REINSURANCE

The Company does not cede business to either affiliates or third parties. The Company reinsures certain risks associated with DLIC's variable annuity contracts and associated riders under a combination modified coinsurance and funds withheld coinsurance agreement (VA Treaty) that was originally effective December 31, 2014. The VA Treaty does not transfer insurance risks to the Company. The VA Treaty's main purpose is to reinsure hedging risks associated with DLIC's variable annuity products.

FINANCIAL STATEMENTS

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

- Statement of Assets as of December 31, 2023
- Statement of Liabilities, Surplus and Other Funds as of December 31, 2023
- Summary of Operations for the Year Ended December 31, 2023
- Reconciliation of Capital and Surplus for the Period from the Prior Examination as of December 31, 2019 to December 31, 2023

Statement of Assets
As of December 31, 2023

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$ 99,981	\$ -	\$ 99,981
Cash and cash equivalents	3,879,906	-	3,879,906
Subtotals, Cash and Invested Assets	<u>\$ 3,979,887</u>	<u>\$ -</u>	<u>\$ 3,979,887</u>
Investment income due and accrued	5,411	-	5,411
Reinsurance:			
Funds held by or deposited with reinsured companies	76,062,887	-	76,062,887
Other amounts receivable under reinsurance contracts	103,378	-	103,378
Current federal and foreign income tax recoverable and interest thereon	453,000	-	453,000
Net deferred tax asset	85,647	85,647	-
Total Assets	<u>\$ 80,690,210</u>	<u>\$ 85,647</u>	<u>\$ 80,604,563</u>

Statement of Liabilities, Surplus and Other Funds
As of December 31, 2023

		<u>Note</u>
Interest maintenance reserve	\$ 46,251	
General expenses	398,902	
Payable to parent, subsidiaries, and affiliates	30,295	
Aggregate write-ins for liabilities - reinsurance deposit liability	<u>76,062,886</u>	1
Total Liabilities	<u>\$ 76,538,334</u>	
Common capital stock	\$ 300,000	
Gross paid in and contributed surplus	2,392,522	
Unassigned funds (surplus)	<u>1,373,707</u>	
Total Capital and Surplus	<u>\$ 4,066,229</u>	
Total Liabilities, Surplus and Other Funds	<u><u>\$ 80,604,563</u></u>	

Summary of Operations
For the Year Ended December 31, 2023

Net investment income	\$ 173,870
Amortization of Interest Maintenance Reserve	(6,610)
Aggregate write ins for miscellaneous income ¹	(192,800,872)
Total revenue and other policyholder adjustments	<u>\$ (192,633,612)</u>
Death benefits	-
Annuity benefits	-
Total benefits and policyholder adjustments	<u>\$ -</u>
General insurance expenses	284,030
Insurance taxes, licenses and fees	98,621
Aggregate write ins for deductions ²	(261,142,024)
Total selling general and other expenses	<u>\$ (260,759,373)</u>
Net gain from operations before dividends to policyholders and federal income taxes	\$ 68,125,761
Dividends to policyholders	-
Net gain from operations after dividends to policyholders and before federal income	\$ 68,125,761
Federal and foreign income taxes incurred	82,379
Net gain from operations after dividends to policyholders and federal income taxes and before realized capital gains/(losses)	\$ 68,043,382
Net realized capital gains/(losses)	(59,814,025)
Net Income	<u><u>\$ 8,229,357</u></u>

¹Consists of \$193,388,585 in investment income on funds withheld and \$587,713 in reinsurance fee income.

²Consists of \$261,142,243 in investment expense on reinsurance deposit liability and \$219 in fines and penalties from regulatory authorities.

Reconciliation of Capital and Surplus
For the Period from the Prior Examination
As of December 31, 2019 to December 31, 2023

	Common Capital Stock	Paid In & Contributed Surplus	Unassigned Funds (Surplus)	Total
Balance at December 31, 2019	\$ 300,000	\$ 2,392,522	\$ 678,850	\$ 3,371,372
Net Income (Loss)	-	-	(276,012,668)	(276,012,668)
Other Changes ¹	-	-	(281,040)	(281,040)
Aggregate Write-ins for Gains and Losses in Surplus ²	-	-	276,381,854	276,381,854
Balance at December 31, 2020	<u>\$ 300,000</u>	<u>\$ 2,392,522</u>	<u>\$ 766,996</u>	<u>\$ 3,459,518</u>
Net Income (Loss)	-	-	165,616,834	165,616,834
Other Changes ¹	-	-	31,623	31,623
Aggregate Write-ins for Gains and Losses in Surplus ²	-	-	(165,444,062)	(165,444,062)
Balance at December 31, 2021	<u>\$ 300,000</u>	<u>\$ 2,392,522</u>	<u>\$ 971,391</u>	<u>\$ 3,663,913</u>
Net Income (Loss)	-	-	186,126,955	186,126,955
Other Changes ¹	-	-	54,156	54,156
Aggregate Write-ins for Gains and Losses in Surplus ²	-	-	(185,982,770)	(185,982,770)
Balance at December 31, 2022	<u>\$ 300,000</u>	<u>\$ 2,392,522</u>	<u>\$ 1,169,732</u>	<u>\$ 3,862,254</u>
Net Income (Loss)	-	-	8,229,357	8,229,357
Other Changes ¹	-	-	(85,749)	(85,749)
Aggregate Write-ins for Gains and Losses in Surplus ²	-	-	(7,939,633)	(7,939,633)
Balance at December 31, 2023	<u>\$ 300,000</u>	<u>\$ 2,392,522</u>	<u>\$ 1,373,707</u>	<u>\$ 4,066,229</u>

¹Other Changes in Unassigned Funds for each year may include: change in net deferred income tax and change in nonadmitted assets.

²The Aggregate Write-Ins for Gains and Losses in Surplus for the years ended 2020 to 2023 was related to the unrealized change in funds withheld on investment income.

**ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS RESULTING FROM THE
EXAMINATION**

There were no changes made to the Company's financial statements as reported in its 2023 NAIC Annual Statement as a result of this examination.

COMMENTS ON FINANCIAL STATEMENT ITEMS

Note 1:

Aggregate Write-in – Reinsurance Deposit Liability	\$76,062,886
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The examination liability for the aforementioned captioned item of \$76,062,886 is the same as reported by the Company as of December 31, 2023. The VA Treaty between the Company and DLIC does not transfer insurance risks, thus its associated activities are accounted for in accordance with Statutory Statement of Accounting Principles No. 61R, *Life, Deposit-Type and Accident and Health Reinsurance*.

In accordance with the VA Treaty, the Company assumes hedging risks associated with DLIC's variable annuity business. Hedging risk is defined as changes in unrealized hedging instrument gains or losses, realized gains and losses on dispositions of hedging instruments, and net investment income or loss from hedging instruments. Net realized losses assumed by the Company are reported in net realized capital gains (losses) less capital gains tax and transfer to the interest maintenance reserve. Interest on funds withheld resulting from net investment income and net unrealized gains (losses) for the period on hedging instruments assumed from DLIC are recorded as investment income (loss) on funds held and investment loss on funds held - unrealized, respectively. Investment income on the reinsurance deposit liability represents the net activity on all hedging instruments assumed under the VA Treaty.

The Department retained the actuarial services of INS Consultants Inc. (Consulting Actuary) to perform a risk-focused review of the Company's accounting for the VA Treaty and

related activities in accordance with applicable NAIC guidance, including NAIC Actuarial Guidelines and Model Regulations. The Consulting Actuary also assisted in reviewing the inherent risks, management oversight and other mitigating controls over the Company's actuarial processes and procedures.

SUBSEQUENT EVENTS

Subsequent events were evaluated through the date that this examination report was available to be issued. Based on this evaluation, the following transactions were deemed material for disclosure in this examination report.

Significant Transactions

There were no significant transactions subsequent to the examination period.

Changes in Key Personnel

Martin B. Woll became Chief Operating Officer in 2024, replacing Robert B. Stanton.

SUMMARY OF RECOMMENDATIONS

There were no recommendations as a result of this examination.

The assistance and cooperation of examiners representing the states on the coordinated examination is acknowledged. In addition, the assistance of the Consulting Actuary, the consulting information systems specialist firm, INS Services, Inc., Investment Specialist, Rutter and Associates, LLC, the Company's outside audit firm, KPMG, and the Company's management and staff was appreciated and is acknowledged.

Respectfully submitted,



Craig Jackson, CPA, CFE
Examiner In-Charge
State of Delaware



Richard Palmatary, CPA, CFE
Supervising Examiner
State of Delaware

I, Craig Jackson, 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 24.032.

A handwritten signature in black ink, appearing to read "Craig Jackson", is centered on the page.

Craig Jackson, CPA, CFE