



STATE OF UTAH INSURANCE DEPARTMENT

REPORT OF FINANCIAL EXAMINATION

of

EZ AUTO INSURANCE COMPANY

of

Provo, Utah

as of

December 31, 2007

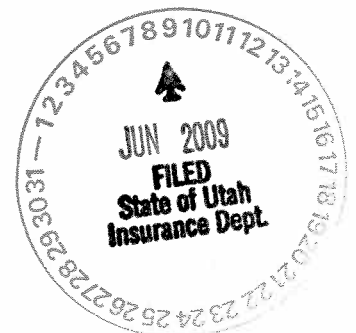


TABLE OF CONTENTS

| | |
|--|----|
| SCOPE OF EXAMINATION..... | 1 |
| Period Covered by Examination | 1 |
| Examination Procedures Employed | 1 |
| Status of Prior Examination Findings | 2 |
| HISTORY | 2 |
| General..... | 2 |
| Capital Stock..... | 2 |
| Dividends to Stockholders..... | 2 |
| Management..... | 2 |
| Conflict of Interest Procedure..... | 4 |
| Corporate Records | 4 |
| Acquisitions, Mergers, Disposals, Dissolutions, and Purchases or Sales through Reinsurance..... | 5 |
| Surplus Debentures | 5 |
| AFFILIATED COMPANIES | 5 |
| Transactions with Affiliates..... | 5 |
| FIDELITY BOND AND OTHER INSURANCE | 6 |
| PENSION, STOCK OWNERSHIP AND INSURANCE PLANS | 6 |
| STATUTORY DEPOSITS | 7 |
| INSURANCE PRODUCTS AND RELATED PRACTICES | 7 |
| Territory and Plan of Operation..... | 7 |
| Marketing and Advertising..... | 8 |
| Treatment of Policyholders..... | 8 |
| REINSURANCE..... | 8 |
| Ceded | 8 |
| Assumed..... | 8 |
| ACCOUNTS AND RECORDS | 9 |
| Custodial Agreements..... | 9 |
| Annual Statement Reporting..... | 9 |
| FINANCIAL STATEMENTS | 10 |
| BALANCE SHEET | 11 |
| STATEMENT OF INCOME..... | 12 |
| RECONCILIATION OF CAPITAL AND SURPLUS..... | 13 |
| NOTES TO FINANCIAL STATEMENTS..... | 13 |
| SUMMARY OF EXAMINATION FINDINGS..... | 14 |
| ACKNOWLEDGEMENT | 15 |

January 7, 2009

Honorable D. Kent Michie, Commissioner
Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114-6901

In accordance with your instructions and in compliance with Utah Code Annotated (U.C.A.) Title 31A, an examination was conducted as of December 31, 2007, of the financial condition and business affairs of:

EZ AUTO INSURANCE COMPANY
Provo, Utah

A stock property and casualty insurance Company, hereinafter referred to as the (Company), and the following report of examination is respectfully submitted.

SCOPE OF EXAMINATION

Period Covered by Examination

The examination covers the period from March 25, 2005, the date of the initial Certificate of Authority through December 31, 2007, including any material transactions and/or events occurring subsequent to the examination date noted during the course of the examination.

Examination Procedures Employed

The Utah Insurance Department (Department) conducted this examination in accordance with the National Association of Insurance Commissioners (NAIC) and the NAIC Financial Condition Examiners Handbook. The examination included a general review and analysis of the Company's operations, the manner in which its business was conducted, and a determination of its financial condition as of December 31, 2007. The examination was conducted in accordance with generally accepted standards and procedures in conformity with the applicable laws of the state of Utah.

The examination included a general review and analysis of the Company's operations, the manner in which its business was conducted during the examination period, and a determination of its financial condition as of December 31, 2007. Material assets were verified and valued, and liabilities were determined in accordance with the laws, rules and procedures prescribed by the state of Utah, and the NAIC Statements of Statutory Accounting Principles (SSAP).

The Company retained the services of a certified public accounting (CPA) firm to audit its financial records for the years under examination. Review and reliance was placed on certain portions of the CPA work for our examination.

A letter of representation obtained from management certifies that all significant matters were disclosed and all records were provided for examination.

Status of Prior Examination Findings

This is the first examination of the Company, and there were no prior examination findings on which to comment.

HISTORY

General

The Company was incorporated on August 13, 2004 and received its certificate of authority to transact insurance business on March 25, 2005. One amendment was filed with the Department on May 27, 2005, correcting the number of authorized shares of common stock, incorrectly specified as 5,000,000 in the original Articles, to 50,000,000.

Capital Stock

At December 31, 2007, the Company had 50,000,000 authorized shares of common stock with no stated par value; and had 18,000,000 shares issued and outstanding with a total reported value of \$1,302,500. The values of each shareholder's stock fluctuates annually, based on production and percentage of business volume at year end, with the total issued and outstanding value remaining at \$1,302,500 during the years covered by examination.

At December 31, 2007, the Company was primarily owned by Lynn G. Connelly, President (16.6%), the Estate of David C. Westover, deceased (10.7%), and others, including primary agent/producers, who owned less than 10% in common stock.

Dividends to Stockholders

No dividends to stockholders were declared or paid from March 25, 2005 through December 31, 2007.

Management

The Company's Bylaws indicated the number of directors to be no less than three, and no more than eight. At December 31, 2007, the Board consisted of six members, three of which are permanent, and three which serve two year terms, to be rotated annually. The following persons served as the Company's directors as of December 31, 2007:

| <u>Name</u> | <u>Principal Occupation</u> |
|----------------------------------|---|
| Lynn G. Connelly Provo, UT | President EZ Auto Insurance Company |
| Charles D. Westover Lehi, UT | Vice President & Secretary EZ Auto Insurance |
| Gregory J. Heiner Provo, UT | Vice President & Treasurer EZ Auto Insurance |
| David M. Morse Huntsville, UT | Owner Morse Insurance Agency |
| Thomas J. Webb Highland, UT | Vice President Monson Insurance Agency |
| Robert S. Wiseman Orem, UT | Owner Wiseman Insurance Agency |

Although there are no shareholder meeting minutes documenting such, there was one director, Gail Jones, appointed during 2007, and also terminated during 2007. This director was replaced by Scott Huff in 2008.

The Company's Bylaws provided that executive officers shall be a chairman, president, secretary, and chief financial officer, to be chosen by the directors for a term of approximately one year. The board of directors (board) may choose additional vice presidents and other officers as needed. The following persons served as executive officers as of December 31, 2007:

| <u>Principal Officer</u> | <u>Office</u> |
|--------------------------|---------------------------------------|
| Lynn Gordon Connelly | President and Chairman |
| Charles David Westover | Secretary |
| Gregory John Heiner | Treasurer and Chief Financial Officer |

As of December 31, 2007, there were no board committees, as actions were generally brought to those in attendance at board meetings rather than to committees.

At December 31, 2007, the Company was not in compliance with U.C.A. § 31A-5-412(2)(a), which requires every corporation to have an audit Committee, except for certain exemptions under U.C.A. § 31A-5-407(4). Pursuant to examiner

recommendations, an audit Committee was established on October 20, 2008, by majority vote of the board, with the appointments of Lynn Connelly, W. Mont Timmins, Charles Westover and Gregory Heiner to serve during 2008. At end of fieldwork, the Company was in compliance with U.C.A. § 31A-5-412(2)(a) for year 2008.

Conflict of Interest Procedure

The Company had no written conflict of interest policy in effect or statements signed by its key officers and directors during the examination period, as required by the NAIC. Pursuant to examiner recommendations, a conflict of interest policy was drafted, and signed statements were subsequently provided to examiners from persons currently serving as of November 2008.

Corporate Records

U.C.A. § 16-10A-1601 provides that corporate records shall be properly maintained, including minutes of all meetings and actions taken. The minutes taken of the board and shareholder meetings did not provide evidence that meetings were held according to Utah Code and in accordance with the Company's Bylaws, particularly the following:

- 1) The corporate minutes did not list the meeting attendees, or evidence that a quorum was met, pursuant to Article III.5 and IV.4 of the Bylaws, for stockholder and director meetings, respectively.
- 2) There was no evidence in the corporate minutes of annual stockholder meetings, and election of directors at each annual meeting, as stated in the Bylaws Article III.2 and III.3, and Article IV.1 which states that directors shall serve a term of one year. The Company explained that directors are rotated on a biannual basis; however this is contradictory to Article IV.1 of the Bylaws. Therefore, during the examination period the Jurat page of the Annual Statements were prepared inaccurately.
- 3) Article IV.2 specifies that the board shall meet at least quarterly. Evidence of quarterly board meetings was not maintained in the corporate minutes.
- 4) Article V.3 specifies that officers are appointed by the board of directors for a term of approximately one year, and discusses the appointment and removal of officers by the board. Evidence was not found in the board minutes that appointments were made or ratified on an annual basis.

Recommendations: We recommend the Company ensure the shareholder and board meetings are held as outlined in its bylaws and in accordance with U.C.A § 16-10A-1601. We also encourage that meetings be conducted and minutes be maintained evidencing proper voting and ratification procedures, approval of prior meeting minutes,

and formalization with the signature of the secretary, as a normal process of parliamentary procedure and rules of order.

Acquisitions, Mergers, Disposals, Dissolutions, and Purchases or Sales through Reinsurance

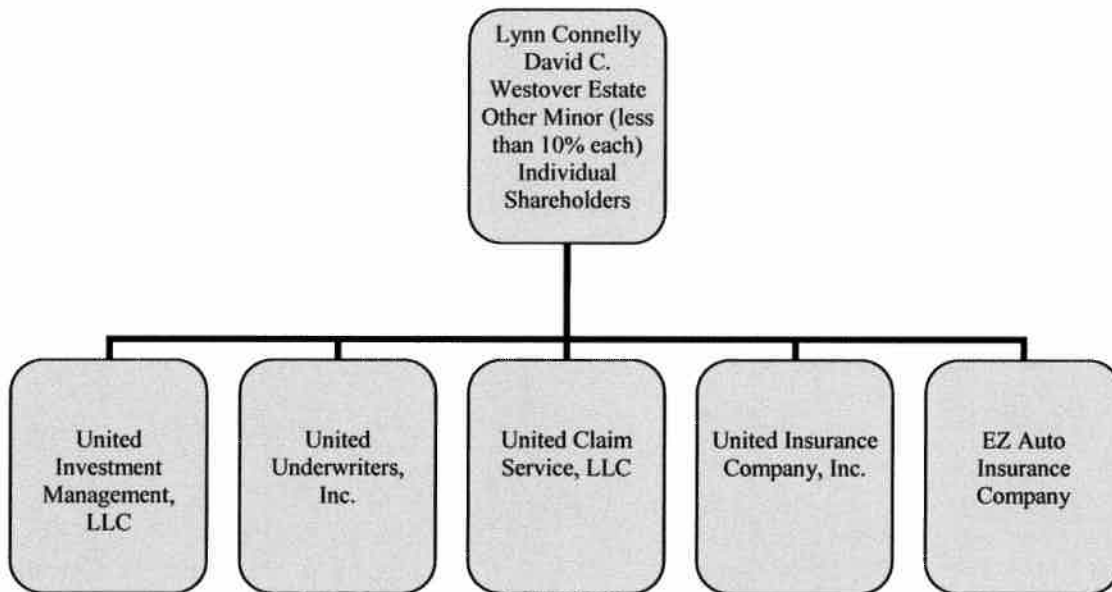
The Company had no acquisitions, mergers, disposals, dissolutions, purchases or sales through reinsurance during the years covered by this examination.

Surplus Debentures

The Company had no surplus debentures in effect, issued or retired during the years covered by this examination.

AFFILIATED COMPANIES

At December 31, 2007, the Company is wholly-owned and controlled by its shareholders. An organizational chart illustrating the Holding Company system follows:



Transactions with Affiliates

During the period ending December 31, 2007, the Company had the following agreements with its affiliates United Underwriters, Inc. and United Claim Service, LLC.

Producer Agreement

The Company entered into a written agreement on December 16, 2005, with United Underwriters, Inc. (UU), by which UU acts as the Company's managing general agent (MGA) and the Producer. The agreement authorizes UU to be responsible for all underwriting, policy issuance, servicing of policies, and marketing functions in connection with the Company's private passenger automobile business in Utah. The agreement provides for UU to collect an initial commission of 22.5% of gross net written premium less cancellations and return premiums, on a monthly basis. UU also shall earn additional provisional commissions based on favorable loss ratio determinations. Pursuant to the agreement, UU must maintain a certain level of Errors and Omissions coverage, which was verified by the examiners. The agreement automatically renews each consecutive twelve month period from effective date, until terminated.

Claims Administration

The Producer is responsible for supervising claims administration as set forth in a "Claims Mandate" attached to the Producer Agreement, by which the Company and the Producer designate another affiliate, United Claim Service, LLC (UCS), to carry out the day to day claims management. All claim files shall be the joint property of the Company and Producer. The Claims Mandate spells out the responsibilities and limitations of the claims manager. All required information must be provided to the Company electronically, reconciled and forwarded within seven (7) business days from the close of each month. The fee to UCS, reported as a loss adjustment expense, is equal to 7.5% of gross net written premiums less cancellations and return premiums.

FIDELITY BOND AND OTHER INSURANCE

The minimum fidelity coverage suggested by the National Association of Insurance Commissioners (NAIC) for this size of property and casualty insurance company is between \$100,000 and \$125,000. As of the examination date, the Company was covered by a fidelity bond with an aggregate liability of \$1,000,000.

PENSION, STOCK OWNERSHIP AND INSURANCE PLANS

Since the staff of UU provided all services to the Company, the Company had no Company employees. Therefore, the Company offered no employee benefits or insurance plans through December 31, 2007.

STATUTORY DEPOSITS

Pursuant to U.C.A. § 31A-4-105 the Company was required to maintain a deposit in the amount of its minimum capital requirement at December 31, 2007. The Company's minimum capital requirement was \$600,000 as determined by U.C.A § 31A-5-211-2(b). The Department confirmed the following assets, and also certified that the assets were held in accordance with U.C.A. § 31A-2-206 at December 31, 2007.

| <u>State</u> | <u>Type of Asset</u> | <u>Book Value</u> | <u>Par Value</u> |
|-----------------------|--|-------------------|------------------|
| Utah | FHLB Agency Note, 6.185%, Mat 5/6/08 | \$301,194 | \$300,000 |
| Utah | FHLB Agency Note, 4.125%, Mat 11/19/08 | 300,451 | 300,000 |
| Utah | Cash | 39,589 | 39,589 |
| Total All Deposits | | <u>\$641,234</u> | <u>\$639,589</u> |

INSURANCE PRODUCTS AND RELATED PRACTICES

Policy Forms and Underwriting

A list of policy forms used in Utah was provided, and based upon their review, the Company appears to have properly filed rates and forms currently in use.

Territory and Plan of Operation

At December 31, 2007, the Company's certificate of authority provided for property and vehicle liability lines of business. The Company began issuing policies in mid 2005. There have been no changes in the Company's operating strategies through December 31, 2007. Through December 2007, the Company's primary product was non-standard private passenger automobile insurance. The automobile policies were written on a semi-annual term and the majority of policyholders were on monthly payment plans.

The Company's records, and those on file with the Department concerning agency appointments were not accurately stated, and some appointments were not made in accordance with U.C.A. § 31A-23a-115. In response to examination recommendations, the Company subsequently made changes to its appointment process to ensure the agencies and agents were licensed, and also that the Company records correspond with Departmental records.

Recommendation: We recommend that the Company establish internal procedures to ensure the information provided by the agencies/agents is correct to properly appoint all individual and agency producers in accordance with U.C.A. § 31A-23a-115.

Marketing and Advertising

The majority of the Company's agency owners are stockholders in the Company. The Company had advertised on billboards, TV, radio and telephone books, in an effort to acquire name recognition. In 2007, it eliminated this advertising strategy, and at December 31, 2007, advertised only in telephone books in Salt Lake, Weber, and Washington counties.

Treatment of Policyholders

The Company had no complaints on file through December 31, 2007.

Company Growth

| | <u>2007</u> | <u>2006</u> | <u>2005</u> |
|-------------------------|------------------|------------------|------------------|
| Direct Premiums Written | 4,522,045 | 3,735,338 | 1,920,538 |
| Reinsurance Assumed | 0 | 0 | 0 |
| Reinsurance Ceded | <u>2,514,502</u> | <u>2,801,503</u> | <u>1,440,403</u> |
| Net Premiums Written | 2,007,543 | 933,834 | 480,134 |

REINSURANCE

Ceded

From May 1, 2005 through June 30, 2007, the Company had a quota share contract with Motors Insurance Corporation through GMAC Reinsurance Corporation, through which the reinsurer assumed 75% and the Company retained 25% of net liability, defined as the Company's gross liability remaining after cessions, if any, to other pro rata reinsurers. The reinsurance intermediary was John B. Collins Associates, Inc..

Effective June 30, 2007, the Company terminated the agreement with Motors Insurance Corporation, and entered into a quota share contract with CSE Safeguard Insurance Company (CSE), a California insurance company licensed to do business in Utah. Under this agreement the Company retained 50% of its net liability up to a \$100,000 limit. The reinsurer accepted 50% up to \$100,000, and 100% above \$100,000 to \$300,000.

Assumed

The Company did not assume business.

ACCOUNTS AND RECORDS

The examination was conducted at the Company's principal business location at 4778 North 300 West, Provo, Utah, where the Company's accounts and records were maintained as required by U.C.A. §31A-5-401.

As of December 31, 2007, the Company's accounting system consisted of a general ledger, registers, statistical and other records maintained primarily on information systems equipment and software.

The following comments and recommendations are made concerning the Company's accounts and records:

Custodial Agreements

At December 31, 2007, the Company had securities held by custodians without proper custodial agreements. The Company did not comply with U.C.A. § 31A-4-108 and Utah Administrative Code (U.A.C.) Rule R590-178. Assets held by these custodians are not considered admissible assets. The Department and the Company management mutually agreed that the Department will allow these assets to be reported as of December 31, 2007, only if custodial agreements were properly executed meeting all requirements of U.A.C. Rule R590-178 prior to the end of examination. The Company provided sufficient evidence to the examiners that corrective action was subsequently taken. The revised custodial agreements were approved by the board and executed with the custodians during June and September 2008. The Company is considered to be in compliance with U.A.C. Rule R590-178 as of the end of examination fieldwork.

Annual Statement Reporting

The General Interrogatories Item 10, Part 1 of the filed 2005 and 2006 Annual Statements incorrectly disclosed Brett Horoff as the actuary who signed the Statement of Actuarial Opinion. The 2007 General Interrogatories properly disclosed Leslie Vernon, who was affiliated with the same actuarial firm, as the preparer and signer of the Opinion for all three years. The NAIC Instructions specifically require the individual person must be named as the appointed actuary rather than the firm or another member of the firm.

Recommendation: We recommend the Company properly disclose the name of the appointed actuary in its statements and filings with the Utah Department of Insurance, pursuant to NAIC Instructions; and the appointed actuary should also correspond with U.A.C. Rule R590-162-5(C) regarding the Actuarial Change Notification Letter.

FINANCIAL STATEMENTS

The following financial statements were prepared from the Company's accounting records and the valuations and determination made during the examination:

BALANCE SHEET as of December 31, 2007

STATEMENT OF REVENUE AND EXPENSES for the Year Ended
December 31, 2007

RECONCILIATION OF CAPITAL AND SURPLUS – 2004 through 2007

The accompanying NOTES TO FINANCIAL STATEMENTS are an integral part of the financial statements.

EZ AUTO INSURANCE COMPANY
BALANCE SHEET
As of December 31, 2007

| | <u>ASSETS</u> | | | <u>Notes</u> |
|--|--|------------------------------------|--|--------------|
| | <u>Net Admitted Assets Per Company</u> | <u>Examination Adjustments</u> | <u>Net Admitted Assets Per Examination</u> | |
| Bonds | \$316,707 | | \$316,707 | |
| Common stocks | 210,975 | | 210,975 | |
| Cash and short-term investments | 1,073,547 | | 1,073,547 | |
| Investment income due and accrued | 9,599 | | 9,599 | |
| Uncollected premiums and agents balances | 1,008,519 | | 1,008,519 | |
| Amounts recoverable from reinsurers | 155,085 | | 155,085 | |
| Net deferred tax asset | 49,528 | | 49,528 | |
| Receivables from parent, subsidiaries and affiliates | 330,010 | | 330,010 | |
| Aggregate write-ins for other than invested | 12,577 | | 12,577 | |
| Total assets | \$3,166,547 | \$0 | \$3,166,547 | |

LIABILITIES, SURPLUS, AND OTHER FUNDS

| | | | | |
|--|-------------|-----|-------------|--|
| Losses | \$503,112 | | \$503,112 | |
| Loss adjustment expenses | 55,376 | | 55,376 | |
| Taxes, licenses and fees | 27,022 | | 27,022 | |
| Current federal and foreign income taxes | (20,000) | | (20,000) | |
| Unearned premiums | 621,327 | | 621,327 | |
| Ceded reinsurance premiums payable | 764,182 | | 764,182 | |
| Aggregate write-ins for liabilities | 13,280 | | 13,280 | |
| Total liabilities | \$1,964,299 | \$0 | \$1,964,299 | |
| Common capital stock | \$1,302,500 | | \$1,302,500 | |
| Gross paid in and contributed surplus | | | | |
| Unassigned funds (surplus) | (100,252) | | (100,252) | |
| Total Surplus as regards policyholders | \$1,202,248 | \$0 | \$1,202,248 | |
| Total liabilities, capital and surplus | \$3,166,547 | \$0 | \$3,166,547 | |

EZ AUTO INSURANCE COMPANY
STATEMENT OF INCOME
For the Year Ended December 31, 2007

| | Current Year Total | Notes |
|--|-----------------------|-------------------|
| | <u> </u> | <u> </u> |
| Premiums earned | \$1,634,376 | |
| Losses incurred | \$1,037,352 | |
| Loss expenses incurred | 156,915 | |
| Other underwriting expenses | 548,096 | |
| Total underwriting deductions | <u>\$1,742,363</u> | |
| Net underwriting gain (loss) | <u>(\$107,987)</u> | |
| Net investment income earned | \$69,216 | |
| Net realized capital gains | 5,521 | |
| Net investment gains or (losses) | <u>\$74,737</u> | |
| Net income before federal and foreign income taxes | (\$33,250) | |
| Federal and foreign income taxes incurred | <u>-</u> | |
| Net income | <u>(\$33,250)</u> | |

EZ AUTO INSURANCE COMPANY
RECONCILIATION OF CAPITAL AND SURPLUS
2004 through 2007

| | 2004 | 2005 | 2006 | Per Exam 2007 | Notes |
|---|--------------------|--------------------|--------------------|--------------------|-------|
| Capital and surplus prior reporting year | \$0 | \$1,056,810 | \$1,247,257 | \$1,218,899 | |
| Net income or (loss) | 1,810 | (74,293) | (59,181) | (33,250) | |
| Change in unrealized capital gains (losses) | | (1,408) | 12,307 | 4,339 | |
| Change in net deferred income tax | | 18,753 | 18,515 | 12,260 | |
| Change in nonadmitted assets | | (106) | | | |
| Change in provision for reinsurance | | | | | |
| Transfer from surplus (stock dividend) | | | | | |
| Change in paid in capital | 1,055,000 | 247,500 | | | |
| Transfer to capital (stock dividend) | | | | | |
| Net change in capital and surplus | <u>\$1,056,810</u> | <u>\$190,447</u> | <u>(\$28,358)</u> | <u>(\$16,651)</u> | |
| Examination Adjustments | 0 | 0 | 0 | 0 | |
| Capital and surplus end of reporting year | <u>\$1,056,810</u> | <u>\$1,247,257</u> | <u>\$1,218,899</u> | <u>\$1,202,248</u> | (1) |

NOTES TO FINANCIAL STATEMENTS

The following adjustments and notes are made to the financial statements as reported at December 31, 2007.

Note (1): Minimum capital and risk-based capital:

As defined by U.C.A. § 31A-17 Part 6, the Company had total adjusted capital of \$1,202,248, which was more than sufficient to meet the authorized control level of \$260,965. The Company's Risk Based Capital (RBC) ratio was 4.61 at December 31, 2007.

The Company's minimum capital requirement was \$600,000 pursuant to U.C.A. § 31A-5-211. The examination total adjusted capital of \$1,202,248 meets the minimum capital requirement.

SUMMARY OF EXAMINATION FINDINGS

Items of significance commented on in this report are summarized below:

1. At December 31, 2007, the Company was not in compliance with U.C.A. § 31A-5-412(2)(a), which requires an audit committee. Subsequently the Company established an audit committee on October 20, 2008, by majority vote of the board, thereby coming into compliance with U.C.A. § 31A-5-412(2)(a) as of the end of fieldwork. (Management)
2. During the examination period, the Company had no written conflict of interest policy in effect or signed disclosure statements as required by the NAIC. Subsequently a conflict of interest policy was drafted, and signed statements were provided to examiners from persons currently serving as directors and officers at November 2008.

Recommendation: We recommend the Company maintain and keep current such procedure going forward. (Conflict of Interest)

3. The Company did not maintain its corporate meeting minutes in compliance with U.C.A § 16-10A-1601 or in accordance with its Bylaws, regarding evidence of attendees and quorum; quarterly board meetings; annual appointment of officers; CPA firm and actuary; and annual election of directors. Therefore, the Jurat page of the Annual Statements during the examination period were prepared inaccurately.

Recommendation: We recommend the Company re-file its 2008 annual statement with accurate disclosures of officers and directors on the Jurat Page in accordance with the NAIC Annual Statement Instructions. We recommend the Company hold its meetings and maintain the minutes of those meetings in accordance with U.C.A § 16-10A-1601 and its Bylaws, and in accordance with normal parliamentary procedure and rules of order. (Corporate Records)

4. Agency appointments were not made in compliance with U.C.A. §31A-23a-115. Discrepancies were found between the Company's records, and Department files. Subsequently during the course of examination, the Company made changes to its appointment process in the third quarter 2008 to ensure the agencies and agents were licensed, and also that the Company records corresponded with Department records as of that date.

Recommendation: We recommend the Company establish internal procedures to ensure the information provided by the agencies/agents is correct to properly appoint all individual and agency producers doing business in Utah. (Territory and Plan of Operation)

5. The Company did not comply with U.C.A. § 31A-4-108 and U.A.C. Rule R590-178. New agreements were subsequently executed in June and September 2008, that were approved by the board and executed with the custodians, bringing the Company into compliance. (Accounts and Records)
6. The 2005 and 2006 Annual Statement General Interrogatories Item 10, Part 1, Disclosure of Actuary was not made in accordance with the NAIC Annual Statement Instructions. The disclosure was corrected in the 2007 General Interrogatories.

Recommendation: We recommend the Company continue to properly disclose the actuary signing the Actuarial Opinion going forward. (Accounts and Records)

ACKNOWLEDGEMENT

In addition to the below signed, Clarissa Crisp, Financial Examiner; Michael Lamb, FCAS, MAAA, Brandon Thomas, HISP, and Colette M. Sawyer Hogan, CFE, CPM, Assistant Chief Examiner, participated in the examination representing the Utah Insurance Department, and join the undersigned in acknowledging the assistance and cooperation extended during the course of this examination by officers, employees, and representatives of the Company.

Respectfully Submitted,



Carolyn Maynard, CFE, Examiner-in-Charge
Huff, Thomas and Company
Representing the Utah Insurance Department