

STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER



FINANCIAL EXAMINATION  
OF  
WASHINGTON CASUALTY COMPANY  
ISSAQUAH, WASHINGTON

NAIC CODE 42510  
December 31, 2009

Participating States:  
Washington

Order No. 10-155  
Washington Casualty Company  
Exhibit A

**SALUTATION**

Seattle, Washington  
August 30, 2010

The Honorable Mike Kreidler, Commissioner  
Washington State Office of the Insurance Commissioner (OIC)  
Insurance Building-Capitol Campus  
302 Sid Snyder Avenue SW, Suite 200  
Olympia, WA 98504

The Honorable Alfred W. Gross, Commissioner  
Chair, NAIC Financial Condition (E) Committee  
State Corporation Commission  
Bureau of Insurance  
Commonwealth of Virginia  
PO Box 1157  
Richmond, VA 23218

The Honorable Monica J. Lindeen, Commissioner  
NAIC Secretary, Western Zone  
Montana Office of the Commissioner of Securities and Insurance  
840 Helena Avenue  
Helena, MT 59601

Dear Commissioners:

In accordance with your instructions, and in compliance with the statutory requirements of RCW 48.03.010, an Association examination was made of the corporate affairs and financial records of

Washington Casualty Company  
of  
Issaquah, Washington

hereinafter referred to as "WCC," or the "Company" at its home office located at 23175 224<sup>th</sup> Place SE, Suite A, Maple Valley, Washington 98038. This report is respectfully submitted showing the condition of WCC as of December 31, 2009.

**CHIEF EXAMINER'S AFFIDAVIT**

I hereby certify I have read the attached Report of the Financial Examination of Washington Casualty Company of Issaquah, Washington. This report shows the financial condition and related corporate matters as of December 31, 2009.



Patrick H. McNaughton  
Chief Examiner

8-30-2010

Date

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## **SCOPE OF THE EXAMINATION**

This examination covers the period January 1, 2005 through December 31, 2009 and comprises a risk focused review of the books and records of the Company. The examination followed statutory requirements contained in the Washington Administrative Code (WAC), the Revised Code of Washington (RCW), and the guidelines recommended by the National Association of Insurance Commissioner (NAIC) Financial Condition Examiners Handbook (FCEH). The examination included identification and disposition of material transactions and events occurring subsequent to the date of examination though the end of field work on July 21, 2010.

Corporate records, external reference materials, and various aspects of the Company's operating procedures and financial records were reviewed and tested during the course of this examination and are commented upon in the following section of this report. In addition, the Company's Certified Public Accountants' (CPA's) work papers were reviewed and utilized, where possible, to facilitate efficiency in the examination.

This examination was performed in compliance with the 2009 NAIC Financial Condition Examiners Handbook which requires the examiner to consider the Company's risk management process, corporate governance structure, and control environment. The examiners utilized the information obtained during the examination to assess the Company's overall potential risks both currently and on an on-going basis, allowing the examiners to focus on the Company's greatest areas of risk, and providing assurance on the Company's financial statements as of the examination date.

## **INSTRUCTIONS**

The examiners reviewed the Company's filed 2009 NAIC Annual Statement as part of the statutory examination. This review was performed to determine if the Company completed the NAIC Annual Statement in accordance with the NAIC Annual Statement Instructions and to determine if the Company's accounts and records were prepared and maintained in accordance with Title 48 RCW, Title 284 WAC, and the NAIC Statements of Statutory Accounting Principles (SSAP) as outlined in the NAIC Accounting Practices and Procedures Manual (AP&P).

The following summarizes the exceptions noted while performing this review:

### **1. NAIC Annual Statement Errors, Omissions, and Misclassifications**

The results of the examination disclosed two instances in which the Company's filing of the 2009 NAIC Annual Statement did not conform to the AP&P Manual and the NAIC Annual Statement Instructions. While the Company needs to correct these practices, none of the following items in this instruction were believed to be material to the financial statements and no examination adjustments were necessary.

#### **a. Receivable from parent, subsidiaries and affiliates**

The Company reported "Federal income tax recoverable" of \$353,476 as a "Receivable from parent, subsidiaries and affiliates" instead of "Current federal and foreign income tax recoverable". The Company reported commissions payable to FinCor Solutions (an affiliate) of \$191,857 as "Receivable from parent, subsidiaries and affiliates" instead of "Commissions payable".

b. **Schedule P**

The Company did not use the correct reinsurance retention amount for reporting four claims on Schedule P, Part 1F, Section 2, for the years 2006, 2007 and 2008. The difference was approximately \$1 million.

**The Company is instructed to comply with RCW 48.05.250 by filing its financial statements in the general form and context approved by the NAIC and WAC 284-07-050(2) which requires adherence to the NAIC Annual Statement Instructions and the AP&P.**

**2. Custodial Agreement Deficiencies**

The Company responded in its 2009 NAIC Annual Statement General Interrogatories 26.01 that its custodial agreements complied with the FCEH. However, they did not contain several provisions required by the FCEH and RCW 48.13.480(2).

**The Company is instructed to execute a revised or amended custodial agreement that complies with the FCEH and RCW 48.13.480(2). The Company is also instructed to comply with RCW 48.05.250 by filing a true statement of its financial condition, transactions and affairs and to follow the NAIC Annual Statement Instructions and the AP&P, as required by WAC 284-07-050(2).**

**3. Approval of Investment Transactions**

The Board of Directors (BOD) meeting minutes did not document approval of investment transactions. RCW 48.13.340 requires all investments, loans, sales or exchanges to be approved or authorized by the BOD or by a committee charged by the BOD with the duty of making the investment, loan, sale or exchange. The minutes of the committee shall be recorded and reports submitted to the BOD for approval or disapproval.

**Pursuant to RCW 48.13.340, the Company is instructed to obtain and document approval by the BOD for all investment transactions. RCW 48.13.350(1) requires a permanent written record of investment transactions be kept and authorized by an officer or by the chairman of the committee authorizing the investment.**

**COMMENTS AND RECOMMENDATIONS**

**1. Intercompany Expense Allocation**

The Company has a written intercompany management services agreement; however, the Company does not have a written formalized process for allocating expenses among affiliates.

**It is recommended that the Company formalize in writing its expense allocation procedure to reflect the allocation process.**

**2. Articles of Incorporation**

WCC's revised Articles of Incorporation continued to specify an outdated address for its principal place of business. WCC also continued to specify the name of the registered agent and the location of registered office, although that is not specifically required by RCW 48.06.200.

**It is recommended that the Company amend its Articles of Incorporation to conform to the minimum requirements of RCW 48.06.200 in order to ensure accurate information and to eliminate unnecessary information.**

## **COMPANY PROFILE**

### **Company History**

WCC was incorporated under Washington law on June 21, 1990 and commenced business on October 1, 1990. The Company was formed as a wholly-owned subsidiary of the Northwest Health Insurance Services (NHIS). WCC assumed the claims-made business written by NHIS, which had provided hospital liability insurance to Washington hospitals since 1976, when it was formed as the Washington Hospital Liability Insurance Fund.

On March 6, 2003, the Superior Court of Thurston County, Washington, entered an Order of Rehabilitation and Appointment of Receiver, placing WCC into rehabilitation.

Effective October 6, 2006, the Thurston County Superior Court approved the acquisition of WCC by FinCor Holdings, Inc. (FinCor) for \$9.8 million. WCC received an additional \$7 million capital contribution from FinCor on December 7, 2006.

On August 31, 2009, FinCor and its five subsidiaries were acquired by Medical Professional Mutual Insurance Company (ProMutual).

### **Capitalization**

The Company has 300,000 shares of \$10 par value Class A stock authorized and outstanding as of December 31, 2009. All of the shares are held by FinCor.

### **Territory**

The Company is currently licensed in five states, Idaho, Montana, Nevada, Oregon and Washington, but only actively writes business in Idaho, Oregon and Washington.

## Growth of Company

The following reflects the growth of the Company as reported in its filed NAIC Annual Statements for the five year period under examination.

<u>Year</u>	<u>Admitted Assets</u>	<u>Liabilities</u>	<u>Capital &amp; surplus</u>	
2009	\$41,677,242	\$26,652,051	\$15,025,191	
2008	38,080,419	22,599,873	15,480,546	
2007	32,878,131	18,635,517	14,242,614	
2006	35,568,166	23,615,027	11,953,139	
2005	21,399,777	24,235,809	(2,836,032)	

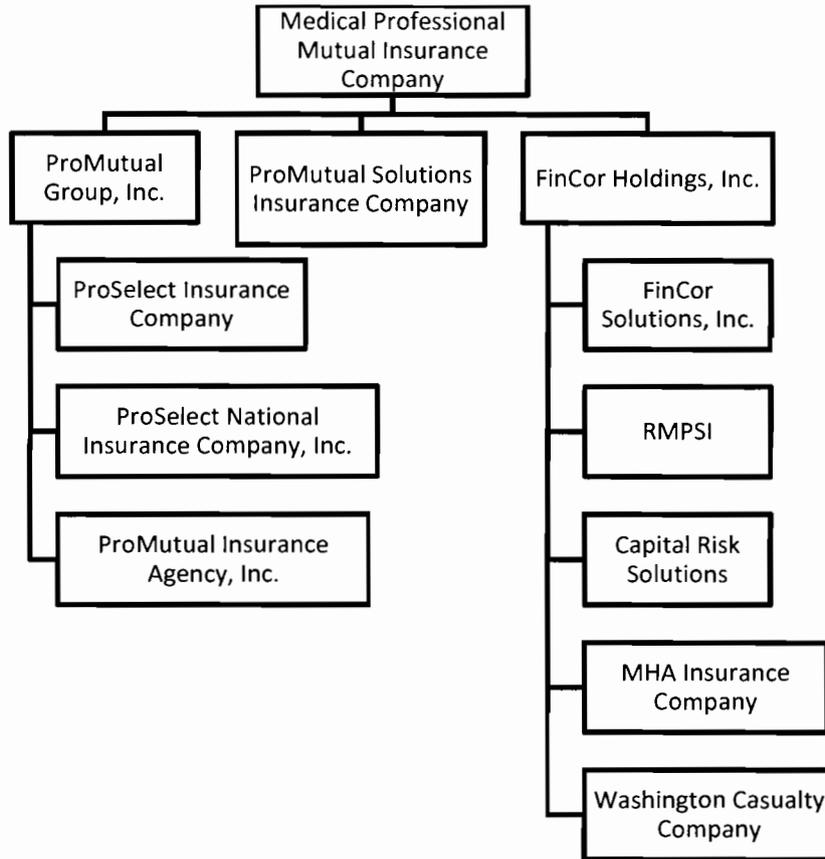
  

<u>Year</u>	<u>Premium Earned</u>	<u>Net Underwriting Gain (Loss)</u>	<u>Net Investment Gain (Loss)</u>	<u>Net Income (Loss)</u>
2009	\$8,651,949	\$(1,673,661)	\$1,343,051	\$(57,582)
2008	6,913,347	(5,376,865)	1,337,211	(2,479,699)
2007	5,714,986	166,598	1,331,390	1,552,352
2006	5,149,067	(3,201,632)	1,098,542	(1,887,415)
2005	5,177,352	4,099,272	553,492	4,905,589

**Affiliated Companies**

WCC is a wholly-owned subsidiary of FinCor Holdings Inc. (FinCor). FinCor is a wholly-owned subsidiary of Medical Professional Mutual Insurance Company.

The following is an organization chart as of December 31, 2009:



- a. **Medical Professional Mutual Insurance Company**  
Medical Professional Mutual Insurance Company (ProMutual) is a Massachusetts domiciled mutual insurance company that sells medical malpractice insurance protection to physicians, hospitals, dentists, and other healthcare providers.
- b. **ProMutual Group, Inc.**  
ProMutual Group, Inc., is a downstream holding company which is 100% owned by ProMutual.
- c. **ProSelect Insurance Company**  
ProSelect Insurance Company (ProSelect) is a Massachusetts insurance company that writes nursing homes and excess and umbrella coverage.
- d. **ProSelect National Insurance Company, Inc.**  
ProSelect National Insurance Company, Inc., is an insurance company domiciled in Arizona.

- e. **ProMutual Insurance Agency, Inc.**  
ProMutual Insurance Agency, Inc., is domiciled and authorized to do business in Massachusetts. It does not place any business at this time.
- f. **ProMutual Solutions Insurance Company**  
ProMutual Solutions Insurance Company (ProMutual Solutions) is domiciled in Vermont and is a sponsored cell captive insurer. ProMutual Solutions contracts with USA Risk Group of Vermont, Inc., an independent provider of alternative risk management services.
- g. **FinCor Holdings, Inc.**  
FinCor Holdings, Inc., is a Michigan-based, wholly-owned subsidiary of ProMutual. FinCor provides risk financing, risk transfer and clinical risk management services to healthcare providers through its subsidiaries.
- h. **FinCor Solutions, Inc.**  
FinCor Solutions, Inc. (FinCor Solutions) is a Michigan-based, multiline insurance agency that is responsible for the direct sales of insurance policies for affiliates and receives commissions from FinCor's insurance subsidiaries
- i. **The Risk Management and Patient Safety Institute**  
The Risk Management and Patient Safety Institute (RM&PSI) markets and provides clinical risk management solutions in all 50 states.
- j. **Capital Risk Solutions**  
Capital Risk Solutions (CRS) provides healthcare clients with comprehensive and balanced solutions to meet insurance and clinical risk management needs and is domiciled in the Cayman Islands.
- k. **MHA Insurance Company**  
MHA Insurance Company (MHAIC) markets and writes medical professional liability insurance for hospitals and physicians and is domiciled in Michigan.

### **Intercompany Agreements**

The Company had several in-force agreements with affiliates. As of December 31, 2009, the Company had the following intercompany agreements in force:

- a. Agency agreement between FinCor Solutions and WCC.
- b. Tax allocation agreement between ProMutual and its affiliates .
- c. Intercompany management services agreement between FinCor, MHAIC, RM & PSI, FinCor Solutions, Inc., and WCC.

## **MANAGEMENT AND CONTROL**

### **Board of Directors (BOD)**

Directors as of December 31, 2009:

Richard Brewer                      Chairman  
John Donehue  
Gregg Hanson

## **Officers**

Officers as of December 31, 2009:

Thomas Dickinson	President
John Donehue	Senior Vice President and Treasurer
Christine Schmitt	Senior Vice President, CFO, Assistant Secretary and Assistant Treasurer
Janice Allegretto	Vice President, General Counsel and Secretary

## **Conflict of Interest**

The Company's policy requires that members of the BOD and officers file an annual conflict of interest statement. Any conflict is referred to the chief executive and the board chair for final resolution. The purpose of the statement is to detect any activities or participation on the part of the directors and/or officers that could possibly be interpreted as a conflict of interest. No exceptions were noted.

## **Fidelity Bond and Other Insurance**

The Company is a named insured on a fidelity insurance policy with FinCor. The aggregate amount of coverage meets the recommended guidelines of the NAIC.

## **Officers', Employees', and Agents' Welfare and Pension Plans**

The Company participates in a qualified non contributory defined benefit pension plan sponsored by MHAIC and a defined contribution plan sponsored by FinCor.

## **CORPORATE RECORDS**

The corporate records were reviewed for the period under examination. The Articles of Incorporation were amended on November 26, 2008 to reflect changes in the Board of Directors, to reflect a change in the Company's business address, to enhance the indemnification provision, and to reflect a change in the registered agent. The latest version of the Articles of Incorporation states that the Company is located at its former address in Issaquah, Washington (See Recommendation 2.)

The Bylaws were substantially amended on October 6, 2006 as a result of the Company's purchase by FinCor. The Bylaws were amended on May 18, 2007 when Article IV-Indemnification was expanded. The Bylaws were amended on October 6, 2009 when Article I-Meetings was expanded.

## **ACTUARIAL REVIEW**

The reserves carried by the Company for unpaid losses and loss adjustment expenses were \$15,750,890 and \$6,517,396, respectively, as of December 31, 2009. The reserves were reviewed by the OIC's casualty actuarial staff as well as the actuarial report provided by the Company's actuarial consulting firm.

The Company provided loss and loss adjustment expense development data by line of business through September 30, 2009.

The OIC's actuarial staff's estimates indicate that the Company's reserves for losses and loss adjustment expenses as of December 31, 2009, on a net basis, are within a reasonable range of estimates. The

Company's loss and loss adjustment expense reserves are accepted as they appear in the Company's 2009 NAIC Annual Statement.

**UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES**

<u>Year</u>	<u>Losses</u>	<u>Losses Adjustment Expenses</u>
<b>2009</b>	\$15,750,890	\$6,517,396
<b>2008</b>	12,370,038	5,731,073
<b>2007</b>	11,250,363	4,137,530
<b>2006</b>	14,085,535	4,525,008
<b>2005</b>	14,231,547	5,896,916

**REINSURANCE**

WCC participates in two excess of loss treaties. The Company does not assume any reinsurance business. Reinsurance agreements were found to be in compliance with Washington State reinsurance statutes and were properly classified in Schedule F of the Company's 2009 NAIC Annual Statement. The Company has controls in place to monitor its reinsurance program including the financial condition of the reinsurers.

WCC utilizes the services of a reinsurance intermediary, Guy Carpenter & Company, Inc., to solicit, negotiate, and place reinsurance cessions on its behalf. Guy Carpenter & Company, Inc., is an international reinsurance intermediary owned by Marsh & McLennan and is licensed in Washington State.

**STATUTORY DEPOSITS**

WCC maintained the following statutory deposits as of December 31, 2009:

<u>State</u>	<u>Type</u>	<u>Book Value</u>	<u>Fair Value</u>
<b>Nevada</b>	US Government Bond	\$225,000	\$228,209
<b>Washington</b>	US Government Bond	1,164,329	1,208,477
<b>Total</b>		<u><u>\$1,389,329</u></u>	<u><u>\$1,436,686</u></u>

**ACCOUNTING RECORDS AND INFORMATION SYSTEM**

The Company maintains its accounting records on a GAAP accrual basis of accounting and adjusts to Statutory Accounting Practices (SAP) basis for NAIC Annual Statement reporting. The Company is audited annually by the certified public accounting firm of PriceWaterhouseCoopers LLP. The Company received an unqualified opinion for all years under review. The Company's accounting procedures,

internal controls, and transaction cycles were reviewed during the planning and testing phase of the examination and no exceptions were noted.

The management of the Company is sufficiently knowledgeable of the information systems (IS) process. Systems development, acquisition, and maintenance controls were evaluated to gain assurance that appropriate controls are in place. Operations and application controls were reviewed to determine the type of hardware installed, operating systems and proprietary software in use, backup and recovery facilities employed, and the controls exercised to maintain data security. Sufficient internal controls are in place and monitored by the Company. The Company's IS Department has the ability to recover from an incident or disaster and has documented these procedures in a detailed, written disaster recovery plan.

#### **SUBSEQUENT EVENTS**

John Donehue submitted his resignation as a director of WCC effective February 26, 2010.

Tom Dickinson, President and CEO, retired on February 28, 2010.

Paul Traynor was named Assistant Secretary effective May 20, 2010.

Amy Irish was named Controller and Assistant Treasurer effective June 14, 2010.

Christine Schmitt, Senior Vice President and CFO, resigned effective June 30, 2010.

John Karlen was named President and Chief Operating Officer of FinCor on July 19, 2010.

#### **FOLLOW UP ON PREVIOUS EXAMINATION FINDINGS**

All previous report instructions and comments have been addressed and corrected.

#### **FINANCIAL STATEMENTS**

The following financial statements show the financial condition of Washington Casualty Company as of December 31, 2009:

Assets, Liabilities, Surplus and Other Funds  
Statement of Income  
Five Year Reconciliation of Surplus

**Washington Casualty Company**  
**Assets, Liabilities, Surplus and Other Funds**  
**December 31, 2009**

	<u>Balance Per Company</u>	<u>Examination Adjustments</u>	<u>Balance Per Examination</u>
<b>Assets</b>			
Bonds	\$30,638,554	\$0	\$30,638,554
Cash	3,931,783	0	3,931,783
Subtotals cash and invested assets	34,570,337	0	34,570,337
Investment income due and accrued	329,065		329,065
Premiiums and considerations			
Uncollected premium and agents' balances in the course of collection	(12,465)		(12,465)
Deferred premium agents' balances and installments booked but deferred and not yet due	5,233,706		5,233,706
Reinsurance			
Amount recoverable from reinsurers	861,846		861,846
Net deferred tax asset	575,031		575,031
Electronic data processing equipment and software	205		205
Receivables from parent, subsidiaries and affiliates	109,849		109,849
Aggregate write-ins for other than invested assets	9,668	0	9,668
<b>Total Assets</b>	<b><u>\$41,677,242</u></b>	<b><u>\$0</u></b>	<b><u>\$41,677,242</u></b>
<b>Liabilities, Surplus and Other Funds</b>			
Losses	\$15,750,890	\$0	\$15,750,890
Loss adjustment expenses	6,517,396		6,517,396
Other expenses	(200,077)		(200,077)
Taxes, licenses and fees	36,085		36,085
Unearned premiums	3,569,746		3,569,746
Advance premiums	4,682		4,682
Ceded reinsurance premiums payable	834,515		834,515
Amounts held or retained by the Company for account of others	680		680
Provision for reinsurance	138,134		138,134
<b>Total Liabilities</b>	<b><u>26,652,051</u></b>	<b><u>0</u></b>	<b><u>26,652,051</u></b>
Common capital stock	3,000,000		3,000,000
Gross paid in and contributed surplus	34,001,313		34,001,313
Unassigned funds (surplus)	(21,976,122)		(21,976,122)
<b>Surplus as regards policyholders</b>	<b><u>15,025,191</u></b>	<b><u>0</u></b>	<b><u>15,025,191</u></b>
<b>Total Liabilities, Surplus and Other Funds</b>	<b><u>\$41,677,242</u></b>	<b><u>\$0</u></b>	<b><u>\$41,677,242</u></b>

**Washington Casualty Company**  
**Statement of Income**  
**For the Year Ended December 31, 2009**

	<u>Balance Per Company</u>	<u>Examination Adjustments</u>	<u>Balance Per Examination</u>
<b>Underwriting Income</b>			
Premiums earned	\$8,651,949	\$0	\$8,651,949
<b>Deductions</b>			
Loss incurred	5,935,765		5,935,765
Loss adjustment expenses incurred	2,617,091		2,617,091
Other underwriting expenses incurred	1,772,754		1,772,754
Total underwriting deductions	<u>10,325,610</u>	<u>0</u>	<u>10,325,610</u>
Net underwriting gain or (loss)	<u><b>(1,673,661)</b></u>	<u><b>0</b></u>	<u><b>(1,673,661)</b></u>
<b>Investment income</b>			
Net investment income earned	1,248,478		1,248,478
Net realized capital gains or (losses)	94,573		94,573
Net investment gain or (loss)	<u><b>1,343,051</b></u>	<u><b>0</b></u>	<u><b>1,343,051</b></u>
<b>Other income</b>			
Aggregate write-ins for miscellaneous income	<u>5,436</u>		<u>5,436</u>
Total other income	<u><b>5,436</b></u>	<u><b>0</b></u>	<u><b>5,436</b></u>
Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	<u>(325,174)</u>	<u>0</u>	<u>(325,174)</u>
Dividends to policyholders	0		0
Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	<u>(325,174)</u>		<u>(325,174)</u>
Federal and foreign income taxes	<u>(267,592)</u>		<u>(267,592)</u>
Net income	<u><b>(\$57,582)</b></u>	<u><b>\$0</b></u>	<u><b>(\$57,582)</b></u>
<b>Capital and Surplus Account</b>			
Surplus as regards policyholders, December 31 prior year	<u>\$15,480,546</u>	<u>\$0</u>	<u>\$15,480,546</u>
Net income	(57,582)		(57,582)
Changes in net deferred income tax	264,591		264,591
Change in nonadmitted assets	(48,748)		(48,748)
Change in provision for reinsurance	(110,134)		(110,134)
Aggregate write-ins for gains and losses in surplus	<u>(503,482)</u>	<u>0</u>	<u>(503,482)</u>
Change in surplus as regards policyholders for the year	<u><b>(455,355)</b></u>	<u><b>0</b></u>	<u><b>(455,355)</b></u>
Surplus as regards policyholders, December 31 current year	<u><b>\$15,025,191</b></u>	<u><b>\$0</b></u>	<u><b>\$15,025,191</b></u>

**Washington Casualty Company**  
**Five Year Reconciliation of Surplus**  
**For the Years Ended December 31,**

	<u>2009</u>	<u>2008</u>	<u>2007</u>	<u>2006</u>	<u>2005</u>
<b>Surplus as regards policyholders, December 31 prior year</b>	\$15,480,546	\$14,242,614	\$11,953,139	(\$2,836,032)	(\$8,030,262)
Net income or (loss)	(57,582)	(2,479,669)	1,552,352	(1,887,415)	4,905,589
Change in net unrealized capital gains (losses) less capital gains tax	0	(92,584)	0	(455,708)	90,975
Change in net deferred income tax	264,591	3,188,901	419,728	1,064	71,504
Change in nonadmitted assets	(48,748)	(2,850,716)	6,343	54,230	134,076
Change in provision for reinsurance	(110,134)	(28,000)	444,000	277,000	(659,000)
Surplus adjustments:					
Paid in	0	3,500,000	0	16,800,000	651,086
Aggregate write-ins for gains or (losses) in surplus	(503,482)	0	(132,948)	0	0
Change in surplus as regards policyholders for the year	(455,355)	1,237,932	2,289,475	14,789,171	5,194,230
<b>Surplus as regards policyholders, December 31 current year</b>	<b>\$15,025,191</b>	<b>\$15,480,546</b>	<b>\$14,242,614</b>	<b>\$11,953,139</b>	<b>(\$2,836,032)</b>

**NOTES TO THE FINANCIAL STATEMENTS**

The Company has no special consents, permitted practices, or orders from the state of Washington.

### **ACKNOWLEDGMENT**

Acknowledgment is hereby made of the cooperation extended to the examiners by the officers and employees of Washington Casualty Company and its affiliates during the course of this examination.

In addition to the undersigned, Michael V. Jordan, CPA, CFE, MHP, Assistant Chief Examiner; John Jacobson, AFE, CISA, AES, Automated Examination Specialist; Susan Campbell, CPA, FLMI, CFE, Reinsurance Specialist; D. Lee Barclay, FCAS, MAAA, Senior Actuary; Timothy F. Hays, CPA, JD, Investment Specialist; Eric Slavich, Actuarial Analyst; Zairina Othman, Financial Examiner, all from the Washington State Office of the Insurance Commissioner, participated in the examination and in the preparation of this report.

Respectfully submitted,



Constantine Arustamian, CPA, CFE, ARC, ARM, ARe, AIS, AIAF  
Examiner-in-Charge  
State of Washington

