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OFFICE OF  
INSURANCE COMMISSIONER

2014 NOV 17 P 2:18

November 17, 2014

Judge George Finkle (Ret.), Presiding Officer  
Office of the Insurance Commissioner, Hearings Unit  
P.O. Box 40255  
Olympia, WA 98504-0255  
5000 Capitol Blvd., SE  
Tumwater, WA 98501

Re: Redomestication application for Commonwealth Insurance Company of America

Dear Judge Finkle:

Attached please find the redomestication application and associated supplementary documents for Commonwealth Insurance Company of America ("CICA"). The applicant has proposed to transfer its state of domicile from Washington to Delaware.

CICA is a domestic Washington company admitted in 1995 to transact general casualty, disability, marine and transportation, ocean marine, property, surety and vehicle insurances. CICA is a direct subsidiary of TIG Insurance Company ("TIG"). As set forth in the application, the company *"is seeking to redomesticate from Washington to Delaware in an effort to reduce the complexity of TIG's corporate structure, including reducing the number of domiciliary states for TIG's subsidiary insurance companies."*

The Company has requested an effective date of redomestication no later than December 31, 2014.

The Company Supervision division is satisfied that the redomestication application is complete and requests that a hearing be scheduled in this matter as soon as possible. Ms. Marcia Stickler, OIC Staff Attorney, is assigned to this case.

If you have any questions, please call me at 360-725-7210 or Ms. Stickler at 360-725-7048.

Sincerely,

A handwritten signature in black ink that reads "Gayle Pasero".

Gayle Pasero, CPCU  
Company Licensing Manager

Cc: Bill Michels, Marcia Stickler, John Pruitt

**SUTHERLAND**

**JOHN S. PRUITT**  
DIRECT LINE: 212.389.5053  
E-mail: john.pruitt@sutherland.com

SUTHERLAND ASBILL & BRENNAN LLP  
Grace Building  
1114 Avenue of the Americas  
40th Floor  
New York, NY 10036-7703  
212.389.5000 Fax 212.389.5099  
www.sutherland.com

August 27, 2014

***VIA FEDERAL EXPRESS***

Gayle Pasero  
Company Licensing Manager  
Company Supervision Division  
Washington State Office of the Insurance Commissioner  
5000 Capital Boulevard  
Turnwater, WA 98501

Re: Redomestication of Commonwealth Insurance Company of America

Dear Ms. Pasero:

Commonwealth Insurance Company of America, a Washington State-domiciled property and casualty insurance company ("CICA"), proposes to redomesticate to Delaware. On behalf of CICA, enclosed please find a copy of the UCAA Primary Application that was submitted to Delaware in connection with this proposed redomestication. We kindly ask that you approve this redomestication prior to December 31, 2014, if possible.

CICA is a direct subsidiary of TIG Insurance Company, a California-domiciled property and casualty insurance company ("TIG"). CICA is seeking to redomesticate in an effort to reduce the complexity of TIG's corporate structure, including reducing the number of domiciliary states for TIG's subsidiary insurance companies.

The relevant contact person at the Delaware Department of Insurance is Linda Sizemore, Director of Company Regulation. Her contact information is as follows:

Linda Sizemore  
Director, Company Regulation  
Delaware Department of Insurance  
841 Silver Lake Boulevard  
Dover, Delaware 19904  
Phone: 302-674-7343

Ms. Gayle Pasero  
August 27, 2014  
Page 2

The enclosed information is highly confidential, sensitive and proprietary either from a business and economic perspective, a personal privacy perspective or both. In order to ensure the confidentiality of the enclosed information, we hereby request that the enclosed information be afforded confidential treatment pursuant to Wash. Rev. Code § 42.56.400. The enclosed information should not be reproduced nor the contents directly or indirectly shared with any person outside the required regulatory process in the State of Washington.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Very truly yours,

  
John S. Pruitt (MLR)

JSP/mlr  
Enclosures