

Supplemental Information

Pasero, Gayle (OIC)

From: Borden, Joshua [Joshua.Borden@sutherland.com]
Sent: Thursday, November 06, 2014 3:58 PM
To: Pasero, Gayle (OIC)
Subject: RE: Commonwealth Insurance Company of America redomestication application

Ms. Pasero,

In your below e-mail, you requested a summary statement expanding on how employees and policyholders will be affected by the redomestication of Commonwealth Insurance Company of America (CICA), along with any litigation in progress. Below please find CICA's response to this request. Please let us know if you have any questions, or if we can provide you with anything else.

Thanks, again, for your attention to this.

Regards,

Josh

CICA Response:

Commonwealth Insurance Company of America ("CICA") does not have any employees. Accordingly; no employees will be terminated and no positions of employment will be transferred as a result of the redomestication of CICA.

The redomestication of CICA will result in no change to the assets or liabilities of the company. CICA will remain fully licensed in each state in which it is currently licensed. Accordingly, the redomestication will have no effect on policyholders.

There are currently two open litigation matters against CICA in Louisiana and Washington. The redomestication of CICA will have no effect on these open litigation matters.

Joshua Borden | Associate | 212.389.5067

From: Pasero, Gayle (OIC) [<mailto:GayleP@OIC.WA.GOV>]
Sent: Wednesday, October 15, 2014 5:19 PM
To: Pruitt, John
Subject: Commonwealth Insurance Company of America redomestication application

Dear Mr. Pruitt,

I have completed my review of the information provided for the redomestication of Commonwealth Insurance Company of America to Delaware.

In addition to the background reports, please forward a summary statement expanding on how employees and policyholders will be affected by the redomestication along with any litigation in process.

Once I review the summary statement and third party investigative reports, the application and my recommendation will be forwarded to our Hearing Officer for further review. A conference call will also be scheduled to determine a hearing date.

Thank you for your assistance.

Best regards,

Gayle Pasero, CPCU

Company Licensing Manager
Company Supervision Division
Washington State Office of the Insurance Commissioner

360.725.7210 | GayleP@oic.wa.gov

5000 Capitol Blvd., Tumwater, WA 98501

P.O. Box 40259, Olympia, WA 98504-0255

www.insurance.wa.gov | twitter.com/WA_OIC | wainsurance.blogspot.com | [email/text alerts](#)

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Pasero, Gayle (OIC)

From: Pasero, Gayle (OIC)
Sent: Friday, September 19, 2014 3:06 PM
To: 'john.pruitt@sutherland.com'
Subject: Commonwealth Insurance Company of America redomestication application

Dear Mr. Pruitt,

Thank you for submitting the redomestication application for Commonwealth Insurance Company of America.

I completed a cursory review of the application and noted that verification reports for the biographical affidavits are not included with the application. Have these been ordered? If not, please use one of the approved NAIC vendors for the third party verification reports. http://www.naic.org/documents/industry_ucaa_third_party.pdf

Additionally, the documents contained within the UCAA Primary Application are public record and are not afforded confidentiality under RCW 42.56.400. However, if a public document request is submitted for documents included within the application, the Company will be notified.

Thank you for your assistance. Please let me know if you have questions.

Best regards,

Gayle Pasero, CPCU
Company Licensing Manager
Company Supervision Division
Washington State Office of the Insurance Commissioner.

360.725.7210 | GayleP@oic.wa.gov | www.insurance.wa.gov
5000 Capital Blvd., Tumwater, WA 98501
P.O. Box 40259, Olympia, WA 98504-0255

Karen Weldin Stewart, CIR-ML
Commissioner



Delaware Department of Insurance

September 29, 2014

VIA ELECTRONIC AND FIRST CLASS MAIL



Ms. Gayle Pasero, CPCU
Company Licensing Manager
Office of the Insurance Commissioner
P.O. Box 40257
Olympia, WA 98504-0257

RE: Re-domestication of Commonwealth Insurance Company of America (NAIC # 10220)

Dear Ms. Pasero:

The Delaware Department of Insurance (the "Department") has received a Re-domestication Application from Commonwealth Insurance Company of America (CICA) in furtherance of its plan to re-domesticate to Delaware. Subject to the Department's final review and approval of the Re-domestication Application, the Department does not have any objection to the proposed re-domestication.

We would appreciate receiving a similar letter from the Washington Office of the Insurance Commissioner regarding the proposed re-domestication of CICA.

Please let us know if you have any questions or require anything further.

Sincerely,

A handwritten signature in cursive script that reads "Linda Sizemore".

Linda Sizemore, CPA, CFE
Director of Company Regulation



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RCWs > [Title 42](#) > [Chapter 42.56](#) > [Section 42.56.400](#)

[42.56.390](#) << [42.56.400](#) >> [42.56.403](#)

RCW 42.56.400

Insurance and financial institutions. (*Effective until July 1, 2017.*)

The following information relating to insurance and financial institutions is exempt from disclosure under this chapter:

(1) Records maintained by the board of industrial insurance appeals that are related to appeals of crime victims' compensation claims filed with the board under [RCW 7.68.110](#);

(2) Information obtained and exempted or withheld from public inspection by the health care authority under [RCW 41.05.026](#), whether retained by the authority, transferred to another state purchased health care program by the authority, or transferred by the authority to a technical review committee created to facilitate the development, acquisition, or implementation of state purchased health care under chapter [41.05](#) RCW;

(3) The names and individual identification data of either all owners or all insureds, or both, received by the insurance commissioner under chapter [48.102](#) RCW;

*Life Settlements
Health plan
N/A*

(4) Information provided under [RCW 48.30A.045](#) through [48.30A.060](#);

(5) Information provided under [RCW 48.05.510](#) through [48.05.535](#), [48.43.200](#) through [48.43.225](#), [48.44.530](#) through [48.44.555](#), and [48.46.600](#) through [48.46.625](#);

*Health plans report of credit funds of accounts - N/A
Report - N/A
- DR correction of revision of policy of insurance
HESC only N/A
HESC N/A
HMO N/A*

(6) Examination reports and information obtained by the department of financial institutions from banks under [*RCW 30.04.075](#), from savings banks under [RCW 32.04.220](#), from savings and loan associations under [RCW 33.04.110](#), from credit unions under [RCW 31.12.565](#), from check cashers and sellers under [RCW 31.45.030\(3\)](#), and from securities brokers and investment advisers under [RCW 21.20.100](#), all of which is confidential and privileged information;

(7) Information provided to the insurance commissioner under [RCW 48.110.040\(3\)](#); *Annual report SEP - N/A*

(8) Documents, materials, or information obtained by the insurance commissioner under [RCW 48.02.065](#), all of which are confidential and privileged;

Working papers etc of financial exam - N/A

(9) Confidential proprietary and trade secret information provided to the commissioner under [RCW 48.31C.020](#) through [48.31C.050](#) and [48.31C.070](#);

*Holding Co - acquisition of foreign health carrier N/A
Holding Co Health carrier N/A
Subsidiary CO - economic of HESC N/A*

(10) Data filed under RCW 48.140.020, 48.140.030, 48.140.050, and 7.70.140 that, alone or in combination with any other data, may reveal the identity of a claimant, health care provider, health care facility, insuring entity, or self-insurer involved in a particular claim or a collection of claims. For the purposes of this subsection:

med mal n/a *med mal n/a* *med mal n/a*

all med mal claim reporting n/a

(a) "Claimant" has the same meaning as in RCW 48.140.010(2).

(b) "Health care facility" has the same meaning as in RCW 48.140.010(6).

(c) "Health care provider" has the same meaning as in RCW 48.140.010

(7).

(d) "Insuring entity" has the same meaning as in RCW 48.140.010(8).

(e) "Self-insurer" has the same meaning as in RCW 48.140.010(11);

MS. fraud n/a

(11) Documents, materials, or information obtained by the insurance commissioner under RCW 48.135.060;

MO n/a

(12) Documents, materials, or information obtained by the insurance commissioner under RCW 48.37.060;

(13) Confidential and privileged documents obtained or produced by the insurance commissioner and identified in RCW 48.37.080;

(14) Documents, materials, or information obtained by the insurance commissioner under RCW 48.37.140;

MS problem n/a

(15) Documents, materials, or information obtained by the insurance commissioner under RCW 48.17.595;

Life settlement n/a

(16) Documents, materials, or information obtained by the insurance commissioner under RCW 48.102.051(1) and 48.102.140 (3) and (7)(a)(ii);

N/A

(17) Documents, materials, or information obtained by the insurance commissioner in the commissioner's capacity as receiver under RCW 48.31.025 and 48.99.017, which are records under the jurisdiction and control of the receivership court. The commissioner is not required to search for, log, produce, or otherwise comply with the public records act for any records that the commissioner obtains under chapters 48.31 and 48.99 RCW in the commissioner's capacity as a receiver, except as directed by the receivership court;

? investment policy

(18) Documents, materials, or information obtained by the insurance commissioner under RCW 48.13.151;

(19) Data, information, and documents provided by a carrier pursuant to section 1, chapter 172, Laws of 2010;

BF n/a

(20) Information in a filing of usage-based insurance about the usage-based component of the rate pursuant to RCW 48.19.040(5)(b);

health care coverage n/a

(21) Data, information, and documents, other than those described in RCW 48.02.210(2), that are submitted to the office of the insurance commissioner by an entity providing health care coverage pursuant to RCW 28A.400.275

and 48.02.210; and

(22) Data, information, and documents obtained by the insurance commissioner under RCW 48.29.017; and

(23) Information not subject to public inspection or public disclosure under RCW 48.43.730(5).

[2013 c 277 § 5; 2013 c 65 § 5; 2012 2nd sp.s. c 3 § 8; 2012 c 222 § 2; 2011 c 188 § 21. Prior: 2010 c 172 § 2; 2010 c 97 § 3; 2009 c 104 § 23; prior: 2007 c 197 § 7; 2007 c 117 § 36; 2007 c 82 § 17; prior: 2006 c 284 § 17; 2006 c 8 § 210; 2005 c 274 § 420.]

Notes:

Reviser's note: (1) RCW 30.04.075 was recodified as RCW 30A.04.075 pursuant to 2014 c 37 § 4, effective January 5, 2015.

(2) This section was amended by 2013 c 65 § 5 and by 2013 c 277 § 5, each without reference to the other. Both amendments are incorporated in the publication of this section under RCW 1.12.025(2). For rule of construction, see RCW 1.12.025(1).

Expiration date -- 2013 c 277: See note following RCW 48.43.730.

Findings -- Goals -- Intent -- 2012 2nd sp.s. c 3: See note following RCW 28A.400.275.

Effective date -- 2011 c 188: See RCW 48.13.900.

Severability -- Effective date -- 2007 c 117: See RCW 48.17.900 and 48.17.901.

Severability -- Effective date -- 2006 c 284: See RCW 48.135.900 and 48.135.901.

Effective date -- 2006 c 8 §§ 112 and 210: See note following RCW 42.56.360.

Findings -- Intent -- Part headings and subheadings not law -- Severability -- 2006 c 8: See notes following RCW 5.64.010.

RCW 42.56.400

Insurance and financial institutions. (Effective July 1, 2017.)

The following information relating to insurance and financial institutions is exempt from disclosure under this chapter:

(1) Records maintained by the board of industrial insurance appeals that are related to appeals of crime victims' compensation claims filed with the board under RCW 7.68.110;

(2) Information obtained and exempted or withheld from public inspection

by the health care authority under RCW 41.05.026, whether retained by the authority, transferred to another state purchased health care program by the authority, or transferred by the authority to a technical review committee created to facilitate the development, acquisition, or implementation of state purchased health care under chapter 41.05 RCW;

(3) The names and individual identification data of either all owners or all insureds, or both, received by the insurance commissioner under chapter 48.102 RCW;

(4) Information provided under RCW 48.30A.045 through 48.30A.060;

(5) Information provided under RCW 48.05.510 through 48.05.535, 48.43.200 through 48.43.225, 48.44.530 through 48.44.555, and 48.46.600 through 48.46.625;

(6) Examination reports and information obtained by the department of financial institutions from banks under *RCW 30.04.075, from savings banks under RCW 32.04.220, from savings and loan associations under RCW 33.04.110, from credit unions under RCW 31.12.565, from check cashers and sellers under RCW 31.45.030(3), and from securities brokers and investment advisers under RCW 21.20.100, all of which is confidential and privileged information;

(7) Information provided to the insurance commissioner under RCW 48.110.040(3);

(8) Documents, materials, or information obtained by the insurance commissioner under RCW 48.02.065, all of which are confidential and privileged;

(9) Confidential proprietary and trade secret information provided to the commissioner under RCW 48.31C.020 through 48.31C.050 and 48.31C.070;

(10) Data filed under RCW 48.140.020, 48.140.030, 48.140.050, and 7.70.140 that, alone or in combination with any other data, may reveal the identity of a claimant, health care provider, health care facility, insuring entity, or self-insurer involved in a particular claim or a collection of claims. For the purposes of this subsection:

(a) "Claimant" has the same meaning as in RCW 48.140.010(2).

(b) "Health care facility" has the same meaning as in RCW 48.140.010(6).

(c) "Health care provider" has the same meaning as in RCW 48.140.010 (7).

(d) "Insuring entity" has the same meaning as in RCW 48.140.010(8).

(e) "Self-insurer" has the same meaning as in RCW 48.140.010(11);

(11) Documents, materials, or information obtained by the insurance commissioner under RCW 48.135.060;

(12) Documents, materials, or information obtained by the insurance commissioner under RCW 48.37.060;

(13) Confidential and privileged documents obtained or produced by the insurance commissioner and identified in RCW 48.37.080;

(14) Documents, materials, or information obtained by the insurance commissioner under RCW 48.37.140;

(15) Documents, materials, or information obtained by the insurance commissioner under RCW 48.17.595;

(16) Documents, materials, or information obtained by the insurance commissioner under RCW 48.102.051(1) and 48.102.140 (3) and (7)(a)(ii);

(17) Documents, materials, or information obtained by the insurance commissioner in the commissioner's capacity as receiver under RCW 48.31.025 and 48.99.017, which are records under the jurisdiction and control of the receivership court. The commissioner is not required to search for, log, produce, or otherwise comply with the public records act for any records that the commissioner obtains under chapters 48.31 and 48.99 RCW in the commissioner's capacity as a receiver, except as directed by the receivership court;

(18) Documents, materials, or information obtained by the insurance commissioner under RCW 48.13.151;

(19) Data, information, and documents provided by a carrier pursuant to section 1, chapter 172, Laws of 2010;

(20) Information in a filing of usage-based insurance about the usage-based component of the rate pursuant to RCW 48.19.040(5)(b);

(21) Data, information, and documents, other than those described in RCW 48.02.210(2), that are submitted to the office of the insurance commissioner by an entity providing health care coverage pursuant to RCW 28A.400.275 and 48.02.210; and

(22) Data, information, and documents obtained by the insurance commissioner under RCW 48.29.017.

[2013 c 65 § 5; 2012 2nd sp.s. c 3 § 8; 2012 c 222 § 2; 2011 c 188 § 21. Prior: 2010 c 172 § 2; 2010 c 97 § 3; 2009 c 104 § 23; prior: 2007 c 197 § 7; 2007 c 117 § 36; 2007 c 82 § 17; prior: 2006 c 284 § 17; 2006 c 8 § 210; 2005 c 274 § 420.]

Notes:

*Reviser's note: RCW 30.04.075 was recodified as RCW 30A.04.075 pursuant to 2014 c 37 § 4, effective January 5, 2015.

Findings -- Goals -- Intent -- 2012 2nd sp.s. c 3: See note following RCW 28A.400.275.

Effective date -- 2011 c 188: See RCW 48.13.900.

Severability -- Effective date -- 2007 c 117: See RCW 48.17.900 and 48.17.901.

Severability -- Effective date -- 2006 c 284: See RCW 48.135.900 and 48.135.901.

Effective date -- 2006 c 8 §§ 112 and 210: See note following RCW 42.56.360.

Findings -- Intent -- Part headings and subheadings not law -- Severability -- 2006 c 8: See notes following RCW 5.64.010.

SUTHERLAND

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

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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:

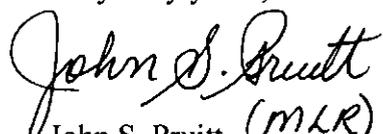
Linda Sizemore
Director, Company Regulation
Delaware Department of Insurance
841 Silver Lake Boulevard
Dover, Delaware 19904
Phone: 302-674-7343

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

**Uniform Certificate of Authority Application (UCAA)
Primary Application**

Of

Commonwealth Insurance Company of America

Filed with the Delaware Department of Insurance

Dated: August 27, 2014

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 29 Del. Code. tit. 29, § 10002(1). 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 Delaware.

Print

VIEW COMPANY

Company Information

Name	COMMONWEALTH INSURANCE COMPANY OF AMERICA	FEIN	91-1673817
NAIC #	10220	Organization Type	Property
WAOIC #	111240	CIC #	COMMOIC057BP
		Company Type	Stock
		NAIC Group Code	158_FAIRFAX FIN GRP



Authorization Information

Admission Date	01/17/1995	Domicile Type	Domestic	Domicile State	Washington
Status	Active	Status Date	01/17/1995	Inactivation Reason	

Application Review

Show All Add Delete

Recv. Date	Assign Date	Assign To	Deemed Comp Date	Appl. Status	Appl. Status Date	
01/17/1995	01/17/1995	Migration Migration	01/17/1995	Approved	01/17/1995	<input type="checkbox"/>

Company Lines

Show All

Lines	Status	Approval Date	Cancel Date	
Casualty	Active	01/17/1995		<input type="checkbox"/>
Disability	Active	06/27/2002		<input type="checkbox"/>
Marine	Active	01/17/1995		<input type="checkbox"/>
Ocean Marine	Active	07/01/2009		<input type="checkbox"/>
Property	Active	01/17/1995		<input type="checkbox"/>
Surety	Active	01/17/1995		<input type="checkbox"/>
Vehicle	Active	01/17/1995		<input type="checkbox"/>

Domiciliary Address

Contact Name C/O LARRY KIBBEE
 Street 1 468 NEZ PERCE PLACE

Street 2

City LACONNOR Country United States
 State / Province Washington Zip 98257
 Phone # 206-382-6670 Extension Fax
 E-mail

Mailing Address

Contact Name

Street 1 250 COMMERCIAL ST STE 5000
 Street 2
 City MANCHESTER Country United States
 State / Province New Hampshire Zip 03101
 Phone # 206-382-6670 Extension Fax
 E-mail

Service Of Process Address

Contact Name

Street 1
 Street 2
 City Country United States
 State / Province Washington Zip
 Phone # Extension Fax
 E-mail

Action Log

Show All Add Delete

Created On	Action	Comments	Created By	<input type="checkbox"/>
07/02/2014	CP - Company Complaint Address	Complaint Address changed from: Peter Uyeyama, ...	COMMONWEALTH INSURANCE COMPANY OF AMERICA	<input type="checkbox"/>
05/14/2014	FS - Financial Statement Address	Financial Statement Address changed from: SOPHI...	COMMONWEALTH INSURANCE CO	<input type="checkbox"/>
03/04/2014	LF - Late Filing	A late filing email notification was sent for t...	Financial Statement Notifications	<input type="checkbox"/>
10/02/2013	MA - Mailing Address	Mailing Address changed FROM: PO BOX 34069, , S...	Shelly Goodwin	<input type="checkbox"/>
10/02/2013	RA - Domiciliary Address	Domiciliary Address changed FROM: 1700 SEVENTH ...	Shelly Goodwin	<input type="checkbox"/>
06/11/2013	CP - Company Complaint Address	Company Complaint Address changed FROM: Ted Hu...	Desiree Rosenberg	<input type="checkbox"/>
01/17/2013	FS - Financial Statement Address	Financial Statement Address Added: SOPHIE DUH, ...	Shelly Goodwin	<input type="checkbox"/>
12/21/2012	CP - Company Complaint Address	Company Complaint Address Added: Ted Hunter, 17...	Desiree Rosenberg	<input type="checkbox"/>
11/20/2009	OT - Other	Status Date Changed to Admission Date. Active c...	Kevin Torgerson	<input type="checkbox"/>

07/09/2009	IL - Insurance Line	Added approved lines: Ocean Marine.	Susan Miller	┐
05/09/2007	OT - Other	FEIN changed from " to '91-1673817'	Import Interface	┐
10/22/2002	MA - Mailing Address	MAILING ADDRESS CHANGE	Migration Migration	┐
10/22/2002	RA - Domiciliary Address	REGISTERED ADDRESS CHANGE	Migration Migration	┐
06/27/2002	IL - Insurance Line	IL - INSURANCE LINE CHANGE	Migration Migration	┐
01/17/1995	AC - Company Authorized	WA SEATTLE	Migration Migration	┐
01/17/1995	AC - Company Authorized	COMPANY ADMITTED	Migration Migration	┐