



FILED

December 29, 2017

OFFICE OF
INSURANCE COMMISSIONER

2017 DEC 29 P 3:52

HEARINGS UNIT
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WILLIAM PARDEE, JD
OFFICE OF THE INSURANCE COMMISSIONER
HEARINGS UNIT
PO BOX 40255
OLYMPIA, WA 98504
5000 CAPITOL BLVD
TUMWATER, WA 98502

Re: Form A Filing dated October 2, 2017 – Proposed Acquisition of Control of REtitle Insurance Company

Dear Mr. Pardee:

Attached please find the Form A Statement requiring the Acquisition of Control of a Domestic Insurer and associated supplementary information. The Form A Statement describes the proposed transaction between the affiliates of A10 Capital LLC and REtitle Insurance Company. REtitle Insurance Company is subject to this proposed acquisition.

The proposed transaction comes at the request of A10 Capital LLC. The acquiring party is an affiliate of A10 Capital Holdings LLC, A10 Equity Holdings LLC, and H.I.G. A10 Capital LLC. A10 Capital LLC would directly control REtitle Insurance Company.

REtitle Insurance Company is a Washington domiciled title insurer.

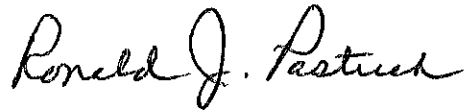
Due to the time restraints to complete this transaction as requested by the parties and based on the requested additional information provided for the Form A filing, the Company Supervision division is recommending approval subject to conditions under the provisions of RCW 48.31B.015(4).

Our proposed conditions will address the conditional requests made in the Form A filing and subsequent information provided to supplement that filing. Our proposed conditions will be included in our recommendation by declaration for the Presiding Officer's consideration.

Mr. David Jorgensen, Esq. is the OIC staff attorney assigned to this case. If you have any questions, please feel free to contact me at 360-725-7211 or Mr. Jorgensen at 360-725-7063.

William Pardee, JD
December 29, 2017
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Yours truly,

A handwritten signature in cursive script that reads "Ronald J. Pastuch". The signature is written in black ink and is positioned above the typed name and title.

RONALD J. PASTUCH, CPA
Holding Company Manager
Company Supervision Division
E-Mail: RonP@oic.wa.gov

Cc: Douglas A. Hartz, MBA, JD, CIR-ML Deputy Insurance Commissioner
David Jorgensen, Esq., Staff Attorney