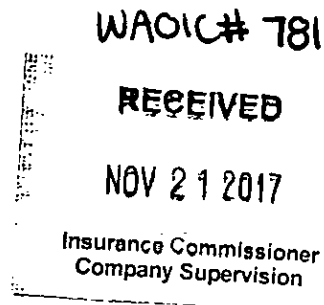


The Form A and Form E Applications of
Retitle Insurance Company by A10 Capital LLC
OIC Docket No. 17-0369
SIMBA NUMBER: 1507579

EXHIBIT 19

11/17/2017 Addendum #2 to Form A filing



STATEMENT REGARDING THE
ACQUISITION OF CONTROL OF OR MERGER WITH A DOMESTIC INSURER

(Addendum No. 2; Response to November 16, 2017 Letter from
Ronald J. Pastuch, Office of Insurance Commissioner)

REtitle Insurance Company
NAIC Number 50962

BEING ACQUIRED
BY

A10 Capital, LLC

Filed with the Insurance Department of the
State of Washington

Date: November 20, 2017

Name, Title, Address, and Telephone Number
of Individual to Whom Notices and Correspondence
Concerning this Statement Should be Addressed:

Ben Slaughter
General Counsel
800 West Main Street
Suite 1100
Boise, Idaho 83702
(208) 577-5078

[The following entries are responses, in order, to the items identified by the Office of Insurance Commissioner's November 16, 2017 letter]

General Items

Form A Statement:

1.
 - a. There are no members of H.I.G. A10 Capital Holdings, LLC that hold membership interests in A10 Equity Holdings, LLC.
 - b. Please see the following chart which identifies the members of A10 Equity Holdings, LLC that also hold minority membership interests in A10 Capital Holding Company, LLC (there are no members of H.I.G. A10 Capital Holdings, LLC that hold membership interests in A10 Capital Holding Company, LLC):

Member Name	Percentage Interest in A10 Equity Holdings, LLC	Office held in A10 Equity Holdings, LLC:
A10 Bell Mountain, LLC	18.16%	
L & L A10 Capital Investors, LLC	13.98%	
BRBK, Inc.	7.66%	
John J. Prehn	7.66%	Manager
Peter Wachtell	7.66%	
Dale Conder	3.62%	
Jerry Dunn Family Trust	13.18%	Manager (Jerry Dunn)
END-IRA, FBO Kenneth Wilson, IRA	2.15%	
Alscott Investments, LLC	10.81%	
Coleman A10 Capital Investors LLC	5.84%	Manager (Brad Coleman)

- c. There are no members in any of the identified LLC's that have membership interests in A10 Capital, LLC (A10 Capital Holding Company, LLC owns 100% of the membership interests in A10 Capital, LLC).
2. Jerry Dunn is a manager of both A10 Capital Holdings, LLC and A10 Equity Holdings, LLC. None of the other individuals identified in Exhibit D hold a director (manager) or executive position at A10 Capital Holdings, LLC or A10 Equity Holdings, LLC.
3. None of the minority members identified on Exhibit G hold a director (manager) or executive position at A10 Capital Holdings, LLC, A10 Equity Holdings, LLC, or A10 Capital, LLC. As indicated in the chart above, Jerry Dunn, Brad Coleman, and John Prehn are managers of both

A10 Equity Holdings, LLC and A10 Capital Holdings, LLC. Jerry Dunn is also the CEO of applicant, A10 Capital, LLC. None of the minority members will be employed by REtitle post-acquisition.

RCW 48.31B.015(4)(a)

1. A10 will be able to ensure that REtitle meets the requirements for issuance of a license to write title insurance after the mergers for a number of reasons:
 - a. First, A10 has substantial financial capital available for the initial infusion of money, and to maintain the capital and surplus minimums requisite of title insurers in the State of Washington. The Form A application includes the unequivocal commitment of A10 to provide a cash investment into REtitle necessary to increase its surplus to the \$4.0 million minimum required. REtitle will maintain that minimum surplus at all times after its acquisition, including by making additional cash investments as necessary. In that regard, A10 realizes that REtitle, which will be essentially in startup mode for a period of time post-acquisition, will require operating capital to finance its growth, and A10 will make the necessary cash investments to provide that operating capital.
 - b. Second, A10 will seek and retain experienced title insurance professionals to provide the depth of management necessary to ensure that REtitle has knowledgeable staff well-versed in the compliant, profitable operation of a title insurer. A10 intends to retain such professional staff from the existing competitors in the industry. A10 will identify to the Commissioner the key members of its management staff as each is hired. Obviously, A10 is not in a position to hire the experienced level of executive staff it intends to add until the acquisition is approved. A10 will ensure that all appropriate background checks and affidavit verifications are performed to ensure that REtitle is managed by competent, qualified professionals.
2. Form E adequately addresses the standard set forth in subsections 3 and 4 of RCW 48.31B.020 by detailing A10's ownership structure and confirming that neither A10, nor any of its members, has any share in any insurance market anywhere; i.e., the proposed acquisition will not have any adverse or unfair effect on competition in the title insurance industry. In fact, the proposed acquisition will enhance competition in the Washington title insurance marketplace by adding an independent, fully-capitalized competitor to the existing list of relatively few well-capitalized competitors.
3. A10's financial condition will not jeopardize the financial stability of REtitle or prejudice the interest of its policyholders; to the contrary, A10's strong financial condition will enable REtitle to resume its title insurance business and increase its reserves to provide additional financial stability for its policyholders. The existing status of REtitle (under the supervision of the Commissioner, with capital that is well below the threshold required to permit additional premium writings in Washington or elsewhere) is in fact the greatest threat to its existing policyholders, as REtitle's assets cannot do anything other than continue to diminish over time. The proposed acquisition offers the existing policyholders the dramatically-enhanced financial security that will come from the ownership of REtitle being transferred to a well-capitalized parent, with the attendant proper capitalization of REtitle, and the resumption of the active writing of title insurance premiums.

4. A10 has no plan to liquidate REtitle, sell its assets, consolidate or merge it with any person, or to make any other material change in its business or corporate structure or management, which are unfair or unreasonable to its policyholders. This means that all existing policyholders of REtitle will continue to have the benefits of REtitle's responsibility for these obligations. REtitle has no plans to transfer, reinsure or otherwise change in any fashion the nature or extent of REtitle's obligations to its existing policyholders. To the contrary, A10's business plan, as set forth in the Form A, will enable REtitle to resume its title insurance business and increase its reserves to provide additional financial stability for its current and future policyholders. A10's acquisition of REtitle will also enhance the competitive market in the title insurance industry in the state, as REtitle will become a viable, properly capitalized alternative to the current, small pool of title insurance competitors in the Washington market. For these reasons, among others (job creation; tax-generating income; etc.), the acquisition is clearly in the best interest of REtitle's Washington policyholders, as well as the Washington state public.

5. A10's post-acquisition plan is to have the current president and owner, David Bayley, remain as president of REtitle for the indefinite future. Further, upon approval of the acquisition, A10 will immediately seek experienced professionals with extensive experience in the core functions of the business of title insurance to add to the operating competence of the Company. This commitment by A10 will allow REtitle to safely write new business at appropriate surplus-to-premium levels. In addition, a Board of Directors will be appointed by REtitle, which will initially consist of the following individuals:

Jerry Dunn, Chairman (also a "controlling person" of A10)

Mark Klipsch (also a "controlling person" of A10)

Jackie Cox (also a "controlling person" of A10)

Ronald Frazier (extensive experience in the title insurance industry)

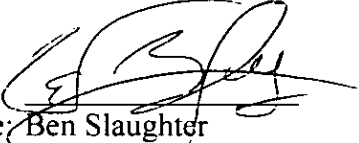
Kevin Lagerway (extensive experience in the title insurance industry)

As the title business grows and accumulates operating income, REtitle will hire staff to fill all necessary roles for the company. A10 will continue supplying staffing support at no cost to REtitle until REtitle is capable of operating the business with its own resources.

6. As explained above, A10's acquisition will bring financial stability to REtitle and allow it to resume its title insurance business, both of which will be beneficial to the insurance-buying public of the State of Washington by providing another well-capitalized competitor to the marketplace.

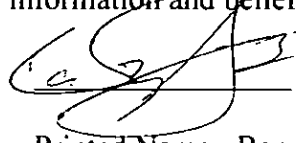
Under the requirements of RCW 48.31B.015, A10 Capital, LLC has caused this application to be duly signed on its behalf in the City of Boise and State of Idaho on the 17th day of November, 2017.

A10 CAPITAL, LLC
a Delaware limited liability company

By: 
Name: Ben Slaughter
Title: General Counsel

CERTIFICATION

The undersigned deposes and says that he has duly executed the attached application dated November 17, 2017, for and on behalf of A10 Capital, LLC; that he is the general counsel of such company and that he is authorized to execute and file the instrument. Deponent further says that he is familiar with such instrument and the contents thereof, and that the facts therein set forth are true to the best of his knowledge, information and belief.



Printed Name: Ben Slaughter

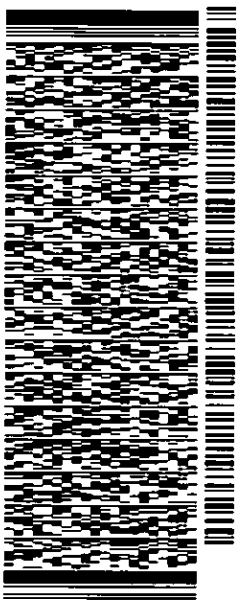
ORIGIN ID: BOMA (208) 577-5000
BEN S JACHTER
AIO CAPITAL LLC
800 W MAIN STREET
SUITE 1100
BOISE ID 83702
UNITED STATES US

SHIP DATE: 21NOV17
ACT WGT: 1.00 LB
CAD: 4385375MINET3920
BILL SENDER

TO **RON PASTUCH**
WASHINGTON OFFICE OF INSURANCE COMM
5000 CAPITOL BLVD SE

TUMWATER WA 98501
(360) 725-7211
INV. REF: AIDRETTITLE - CONFIDENTIAL
DEPT:

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Insurance Commissioner
Company Supervisor

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