

STATE OF WASHINGTON
OFFICE OF THE INSURANCE COMMISSIONER



FINANCIAL EXAMINATION
OF
FIRST NATIONAL INSURANCE COMPANY OF AMERICA
SEATTLE, WASHINGTON

NAIC CODE 24724
December 31, 2009

Participating States:
Washington
Indiana
Illinois

First National Insurance Company of America
Order No. 11-155
Exhibit A

SALUTATION

Seattle, Washington
June 21, 2011

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 Joseph Torti, III
Chair, NAIC Financial Condition (E) Committee
Superintendent
State of Rhode Island
Department of Business Regulation
Division of Insurance
1511 Pontiac Avenue, Building 69-2
Cranston, RI 02920

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

Dear Commissioners and Superintendent:

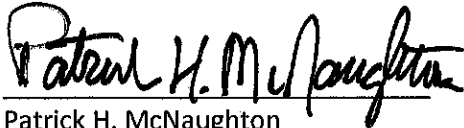
In accordance with your instructions, and in compliance with the statutory requirements of RCW 48.03.010, an Association examination was made of the corporate affairs and financial records of

First National Insurance Company of America
of
Seattle, Washington

hereinafter referred to as "FNICA," or the "Company" at the home office located of the Liberty Mutual group of companies (Liberty Mutual) at 175 Berkeley Street, Boston, Massachusetts 02116. This report is respectfully submitted showing the condition and related corporate matters of FNICA as of December 31, 2009.

CHIEF EXAMINER'S AFFIDAVIT

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



Patrick H. McNaughton
Chief Examiner

6-21-2011
Date

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SCOPE OF THE EXAMINATION

This examination covers the period January 1, 2006 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 Commissioners (NAIC) Financial Condition Examiners Handbook (FCEH). The examination included identification and disposition of material transactions and events occurring subsequent to the date of examination through the end of field work on April 13, 2011.

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 FCEH 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.

This examination was classified as a coordinated lead state examination. Indiana was designated the lead state of the coordinated examination and examiners from the states of Washington, Indiana, and Illinois participated and assessed the financial condition and corporate affairs of the Company.

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 exception noted while performing this review:

1. Compliance with Limitations in Medium and Lower Grade Investments

FNICA reported in its 2009 NAIC Annual Statement, as medium grade securities, its investment in Bank of America Corporation (BoA) preferred stock, that exceeded the one percent limitation of RCW 48.13.273(2)(d) by \$2,204,831. RCW 48.13.273(2)(d) limits investments in medium and lower grade securities issued, guaranteed, or insured by any one entity to one percent of the insurer's total admitted assets. No examination adjustment was necessary due to immateriality.

The Company is instructed to comply with RCW 48.13.273(2)(d) by limiting its investments in medium and lower grade securities to no more than one percent of its total admitted assets.

COMMENTS AND RECOMMENDATIONS

None

COMPANY PROFILE

Company History

The Company was incorporated under the laws of the state of Washington on October 10, 1928 and began active operations on November 1, 1928. The Company is authorized to write property, inland marine, general casualty, vehicle, surety, and ocean marine insurance.

As of December 31, 2009, FNICA was wholly-owned by its parent, Safeco Corporation. On September 22, 2008, all of the outstanding and issued common stock shares of Safeco Corporation were acquired by LIH US P&C Corporation, a Delaware corporation and a direct wholly-owned subsidiary of Liberty Insurance Holdings, Inc. (LIHI), which in turn is a Delaware corporation that at the time was more than 93% owned by Liberty Mutual Insurance Company (LMIC), a Massachusetts domiciled stock insurance company and an indirect, wholly-owned subsidiary of Liberty Mutual Holding Company Inc. (LMHC), with the remaining percentage of LIHI owned by other indirect, wholly-owned subsidiaries of LMHC.

Capitalization

As of December 31, 2009, the Company's authorized capital was \$5 million, which consisted of 20,000 shares of issued and outstanding common stock at a par value of \$250 per share and all authorized shares were issued and outstanding. Total capital and surplus as of December 31, 2009 was \$80,665,460.

There has been no change in the par value or the number of issued and outstanding common shares of the Company since the last examination.

Territory and Plan of Operation

FNICA is licensed in all 50 states. For 2009, the Company's direct business consists of nearly 37 percent auto, 22 percent homeowners multiple peril, 15 percent commercial multiple peril, and 13 percent surety. Approximately 70 percent of FNICA's direct written premiums were in the states of California, Washington, South Carolina, Florida and Texas.

The Company was a participant with Peerless Insurance Company (PIC) and other Liberty Mutual affiliated insurance companies in the Amended and Restated Reinsurance Pooling Agreement, where the mix of business for the pooled companies was approximately 50 percent commercial lines, 43 percent personal, and 7 percent surety, based on net earned premiums.

With over 57,000 appointed independent agents and brokers nationwide (including over 2,300 in Washington state), FNICA is part of Liberty Mutual's Agency Markets (Agency Markets) strategic business unit. Claim offices are maintained throughout the United States to service the Company's claimants.

Growth of Company

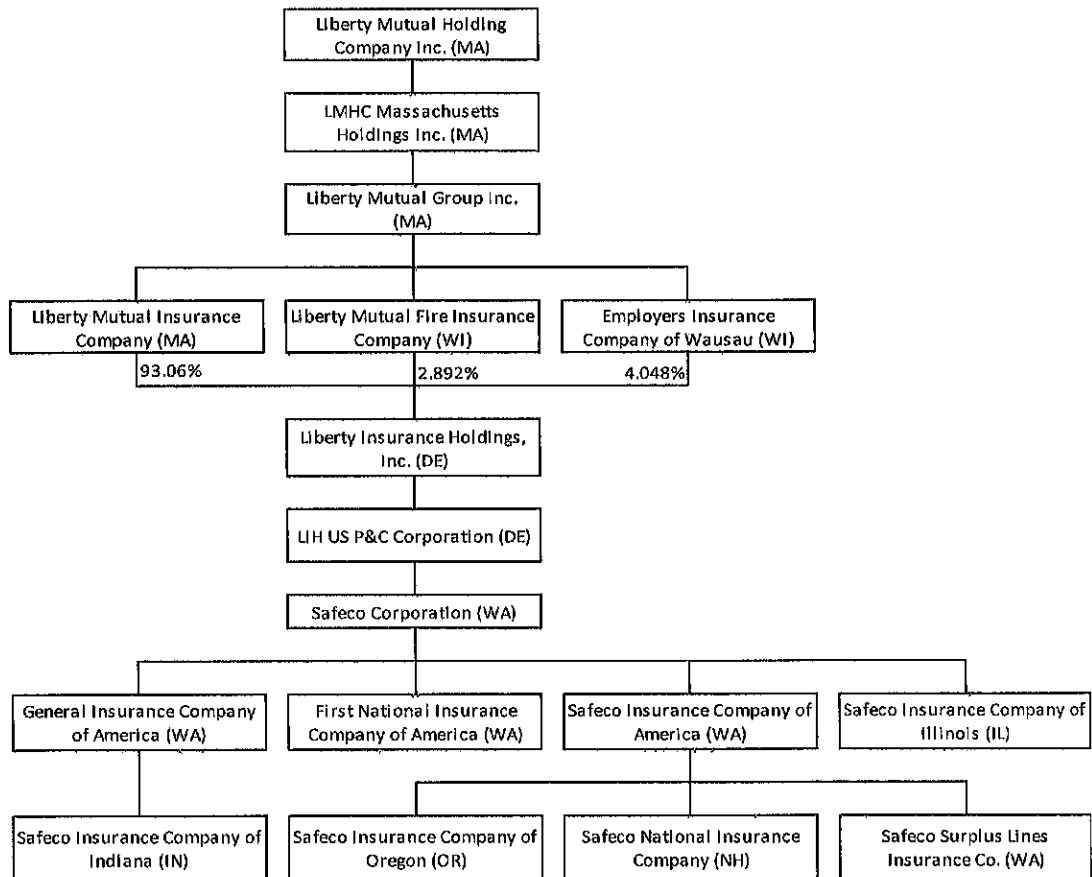
The following reflects the growth of the Company as reported in its filed NAIC Annual Statements for the four year period under examination:

Year	Admitted		
	Assets	Liabilities	Capital & Surplus
2009	\$262,916,942	\$182,251,482	\$80,665,460
2008	243,578,783	173,783,074	69,795,709
2007	254,088,224	179,272,616	74,815,608
2006	253,514,190	175,928,221	77,585,969

Year	Premium	Net Underwriting	Net Investment	Net Income
	Earned	Gain (Loss)	Gain (Loss)	
2009	\$ 83,812,239	\$ 3,518,313	\$ 8,158,938	\$ 8,095,394
2008	110,594,324	2,945,937	4,823,508	5,193,653
2007	111,839,810	7,263,937	10,727,009	14,168,701
2006	112,500,149	13,003,789	9,133,840	16,331,743

Affiliated Companies

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



FNICA is a wholly-owned subsidiary of Safeco Corporation, a non-insurance holding company incorporated under the laws of the state of Washington. In turn, Safeco Corporation is controlled by its ultimate parent, LMHC, a non-publicly traded corporation incorporated under the laws of the state of Massachusetts.

Intercompany Agreements

As of December 31, 2009, the Company had the following intercompany agreements in force, with the effective date indicated:

Intercompany Short-Term Borrowing Agreement	November 1, 2007
Federal Tax Sharing Agreement (Amendment No. 4)	September 22, 2008
Investment Management Agreements	September 22, 2008
Cash Management Agreement	September 22, 2008
Management Services Agreement	January 1, 2009
Amended and Restated Reinsurance Pooling Agreement (Endorsement No. 2)	January 1, 2009
Services Agreement (Amendment No. 7)	January 1, 2009

MANAGEMENT AND CONTROL

Board of Directors (BOD)

Directors of the Company as of December 31, 2009:

- Gary R. Gregg Chairman of the Board
- John D. Doyle
- Michael J. Fallon
- Joseph A. Gilles
- Scott R. Goodby
- Christopher C. Mansfield

Officers

Officers of the Company as of December 31, 2009:

- Gary R. Gregg President and Chief Executive Officer
- Michael J. Fallon Chief Financial Officer and Treasurer
- Anthony A. Fontanes Chief Investment Officer and Executive Vice President
- Joseph A. Gilles Executive Vice President
- Scott R. Goodby Chief Operating Officer and Executive Vice President
- Dexter R. Legg Secretary

Conflict of Interest

All BOD and officers signed a conflict of interest statement as of December 31, 2009. The purpose of the statement is to detect any activities or participation on the part of the BOD and officers that could possibly be interpreted as a conflict of interest. No exceptions were noted during our review.

Fidelity Bond and Other Insurance

The Company is a named insured under a financial institution bond that provides \$15 million of directors' and officers' liability insurance issued to LMHC and its subsidiaries. The fidelity coverage carried by the Company exceeds the NAIC minimum recommended amount.

The Company was also a named insured on various insurance policies issued to LMHC and its subsidiaries that provided property coverage for buildings and contents and comprehensive commercial general liability. These policies were in effect during the period covered by this examination and provided coverage for the Company.

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

The Company does not have any direct employees, so it does not have any direct obligations for a defined benefit plan, deferred compensation arrangement, compensated absences or other post retirement benefit plans.

Liberty Mutual offers its eligible full-time and part-time employees medical, dental and vision coverage; disability insurance; employee and dependent life insurance and accidental death and dismemberment coverage; retirement benefit plan; and an opportunity to participate in the 401(k) savings plan. Long term care insurance is also offered.

CORPORATE RECORDS

The Company's Articles of Incorporation, Bylaws, and minutes of the BOD and committees were reviewed for the period under examination. All BOD meetings were conducted with a quorum present. Investment purchases, transfers, and disposals were ratified by the BOD and noted in the minutes.

UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

<u>Year</u>	<u>Losses</u>	<u>Loss Adjustment Expenses</u>
2009	\$75,202,385	\$17,904,365
2008	77,545,504	18,076,766
2007	76,408,786	18,192,060
2006	75,472,212	19,269,637

As shown above, the reserves carried by the Company for unpaid losses and loss adjustment expenses were \$75,202,385 and \$17,904,365, respectively, as of December 31, 2009.

The actuarial consulting firm contracted by the Indiana Department of Insurance, Merlinos & Associates, Inc., reviewed the unpaid losses and loss adjustment expense reserves of the Peerless Insurance Company Pool (Peerless Pool), which includes FNICA, and concluded that the reserves for the insurance companies in the Peerless Pool were within a range of reasonable estimates. Therefore, the Company's loss and loss adjustment expense reserves were accepted as reasonable and no adjustments were proposed to the amounts reported in the Company's 2009 NAIC Annual Statement.

REINSURANCE

In accordance with the Peerless Pool's intercompany Amended and Restated Reinsurance Pooling Agreement led by PIC, FNICA cedes 100 percent of its business to PIC before PIC retrocedes to FNICA its 0.8 percent pool participation percentage. In its 2009 NAIC Annual Statement, FNICA reported

\$80,958,674 net premiums written and \$44,848,606 net paid losses. As of December 31, 2009, the Company had \$13,478,492 in aggregate unsecured amounts recoverable from PIC.

STATUTORY DEPOSITS

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

<u>State</u>	<u>Type</u>	<u>Book Value</u>	<u>Fair Value</u>
Arizona	Bond	\$ 1,962,673	\$ 1,921,023
California	Bond	4,945,974	5,190,800
Georgia	Bond	101,085	110,031
Idaho	Bond	128,724	135,321
Massachusetts	Bond	812,947	843,040
Montana	Bond	25,271	27,508
Nevada	Bond	103,335	116,984
New Mexico	Bond	413,176	401,784
North Carolina	Bond	359,788	361,004
Oregon	Bond	14,008,654	15,845,374
Washington	Bond	18,997,413	20,461,147
Total		<u>\$41,859,040</u>	<u>\$45,414,016</u>

ACCOUNTING RECORDS AND INFORMATION SYSTEM

The Company maintains its accounting records on a Statutory Accounting Practices (SAP) basis for NAIC Annual Statement reporting. The Company is audited annually by the certified public accounting firm of Ernst & Young 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 Company's Information Technology (IT) environment was reviewed during the planning and testing phase of the examination, focusing on the following Control Objectives for Information and related Technology (COBIT) Framework domains:

- Plan and Organize
- Acquire and Implement
- Deliver and Support
- Monitor and Evaluate

The IT systems and controls were evaluated to gain an understanding of general IT control risks and assess the effectiveness of these controls. Appropriate mitigating and internal controls have been implemented to reduce residual risk to appropriate levels.

SUBSEQUENT EVENTS

On March 31, 2010, Safeco Corporation transferred by capital contribution its 100 percent ownership of FNICA to an affiliated insurance company incorporated under the laws of the state of Illinois, Safeco Insurance Company of Illinois (SICIL). FNICA was contributed at statutory book value, at the date of transfer, in the amount of \$43,847,671. Concurrently, Safeco Corporation's 100 percent ownership of SICIL was transferred by a capital contribution to an affiliated insurance company incorporated under the laws of the state of Washington, Safeco Insurance Company of America (SICA), which resulted in FNICA becoming an indirect subsidiary of SICA.

Effective April 14, 2010, LIH US P&C Corporation, the parent of Safeco Corporation, was renamed Liberty Mutual Agency Corporation.

On February 1, 2011, the BOD voted to accept Gary R. Gregg's resignation as the Chairman of the BOD, President and Chief Executive Officer, and Director of the Company. J. Paul Condrin, III, President of Liberty Mutual's Commercial Markets strategic business unit, was elected to take Mr. Gregg's place until the next annual meeting or until his successor is elected.

There were no additional material events impacting the Company between the examination date and the last day of our field work.

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 First National Insurance Company of America as of December 31, 2009:

Assets, Liabilities, Surplus and Other Funds
Statement of Income and Capital and Surplus Account
Four Year Reconciliation of Surplus

First National Insurance Company of America
Assets, Liabilities, Surplus and Other Funds
December 31, 2009

	<u>Balance Per Company</u>	<u>Examination Adjustments</u>	<u>Balance Per Examination</u>
Assets			
Bonds	\$177,709,820	\$0	\$177,709,820
Stocks			
Preferred stocks	8,583,700		8,583,700
Common stocks	21,244		21,244
Cash, cash equivalents, and short-term investments	22,407,907		22,407,907
Other invested assets	1		1
Receivables for securities	3,707		3,707
Subtotals, cash and invested assets	<u>208,726,379</u>	<u>0</u>	<u>208,726,379</u>
Investment income due and accrued	2,047,664		2,047,664
Premiums and considerations:			
Uncollected premiums and agents' balances in the course of collection	3,169,545		3,169,545
Deferred premiums, agents' balances and installments booked but deferred and not yet due	22,505,322		22,505,322
Accrued retrospective premiums	130,638		130,638
Amounts recoverable from reinsurers	13,478,492		13,478,492
Net deferred tax asset	4,480,450		4,480,450
Guaranty funds receivable or on deposit	148,110		148,110
Receivables from parent, subsidiaries and affiliates	7,557,123		7,557,123
Aggregate write-ins for other than invested assets	673,219		673,219
Total Assets	<u>\$262,916,942</u>	<u>\$0</u>	<u>\$262,916,942</u>
Liabilities, Surplus and Other Funds			
Losses	\$75,202,385	\$0	\$75,202,385
Reinsurance payable on paid losses and loss adjustment expenses	4,848,246		4,848,246
Loss adjustment expenses	17,904,365		17,904,365
Commissions payable, contingent commissions and other similar charges	2,131,004		2,131,004
Other expenses	2,529,800		2,529,800
Taxes, licenses and fees	766,884		766,884
Current federal and foreign income taxes	571,096		571,096
Unearned premiums	36,809,073		36,809,073
Advance premium	262,010		262,010
Dividends declared and unpaid: Policyholders	67,920		67,920
Ceded reinsurance premiums payable	18,208,516		18,208,516
Amounts withheld or retained by company for account of others	(29,510)		(29,510)
Drafts outstanding	2,628,741		2,628,741
Payable to parent, subsidiaries and affiliates	1,350,103		1,350,103
Aggregate write-ins for liabilities	19,000,849		19,000,849
Total Liabilities	<u>182,251,482</u>	<u>0</u>	<u>182,251,482</u>
Aggregate write-ins for special surplus funds	654,001		654,001
Common capital stock	5,000,000		5,000,000
Gross paid in and contributed surplus	581,836		581,836
Unassigned funds (surplus)	74,429,623		74,429,623
Surplus as regards policyholders	<u>80,665,460</u>	<u>0</u>	<u>80,665,460</u>
Total Liabilities, Surplus and Other Funds	<u>\$262,916,942</u>	<u>\$0</u>	<u>\$262,916,942</u>

First National Insurance Company of America
Statement of Income and Capital and Surplus Account
For the Year Ended December 31, 2009

	<u>Balance Per Company</u>	<u>Examination Adjustments</u>	<u>Balance Per Examination</u>
Underwriting Income			
Premiums earned	\$83,812,239	\$0	\$83,812,239
Deductions			
Losses incurred	42,505,492		42,505,492
Loss adjustment expenses incurred	9,951,031		9,951,031
Other underwriting expenses incurred	27,824,328		27,824,328
Aggregate write-ins for underwriting deductions	<u>13,075</u>		<u>13,075</u>
Total underwriting deductions	<u>80,293,926</u>	<u>0</u>	<u>80,293,926</u>
Net underwriting gain or (loss)	<u>3,518,313</u>	<u>0</u>	<u>3,518,313</u>
Investment Income			
Net investment income earned	8,401,781		8,401,781
Net realized capital gains or (losses)	<u>(242,843)</u>		<u>(242,843)</u>
Net investment gain or (loss)	<u>8,158,938</u>	<u>0</u>	<u>8,158,938</u>
Other Income			
Net gain or (loss) from agents' or premium balances charged off	(370,992)		(370,992)
Finance and service charges not included in premiums	714,561		714,561
Aggregate write-ins for miscellaneous income	<u>(484,614)</u>		<u>(484,614)</u>
Total other income	<u>(141,045)</u>	<u>0</u>	<u>(141,045)</u>
Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	11,536,206		11,536,206
Dividends to policyholders	<u>358,600</u>		<u>358,600</u>
Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	11,177,606		11,177,606
Federal and foreign income taxes incurred	<u>3,082,212</u>		<u>3,082,212</u>
Net income	<u>\$8,095,394</u>	<u>\$0</u>	<u>\$8,095,394</u>
Capital and Surplus Account			
Surplus as regards policyholders, December 31 prior year	<u>\$69,795,709</u>	<u>\$0</u>	<u>\$69,795,709</u>
Gains and (losses) in surplus			
Net income	8,095,394		8,095,394
Change in net unrealized capital gains or (losses)	1,736,146		1,736,146
Change in net deferred income tax	(897,399)		(897,399)
Change in nonadmitted assets	1,384,398		1,384,398
Aggregate write-ins for gains and losses in surplus	<u>551,212</u>		<u>551,212</u>
Change in surplus as regards policyholders for the year	<u>10,869,751</u>	<u>0</u>	<u>10,869,751</u>
Surplus as regards policyholders, December 31 current year	<u>\$80,665,460</u>	<u>\$0</u>	<u>\$80,665,460</u>

First National Insurance Company of America
Four Year Reconciliation of Surplus
For the Years Ended December 31,

	<u>2009</u>	<u>2008</u>	<u>2007</u>	<u>2006</u>
Capital and Surplus, December 31, previous year	<u>\$69,795,709</u>	<u>\$74,815,608</u>	<u>\$77,585,969</u>	<u>\$74,529,926</u>
Net income or (loss)	8,095,394	5,193,653	14,168,701	16,331,743
Change in net unrealized capital gains or (losses)	1,736,146	(8,193,377)	(606,496)	2,950,337
Change in net deferred income tax	(897,399)	1,139,453	(1,254,219)	(1,487,393)
Change in nonadmitted assets	1,384,398	(3,204,416)	(78,347)	1,031,228
Cumulative effect of changes in accounting principles		636,995		
Dividends to stockholders			(15,000,000)	(15,000,000)
Aggregate write-ins for gains and losses in surplus	<u>551,212</u>	<u>(592,207)</u>		<u>(769,872)</u>
Change in surplus as regards policyholders for the year	<u>10,869,751</u>	<u>(5,019,899)</u>	<u>(2,770,361)</u>	<u>3,056,043</u>
Capital and Surplus, December 31, current year	<u>\$80,665,460</u>	<u>\$69,795,709</u>	<u>\$74,815,608</u>	<u>\$77,585,969</u>

NOTES TO THE FINANCIAL STATEMENTS

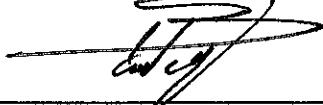
The Company has no special consents or permitted practices from the state of Washington.

ACKNOWLEDGMENT

Acknowledgment is hereby made of the cooperation extended to the examiners by the officers and employees of First National Insurance Company of America 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; Timothy F. Hays, CPA, JD, Investment Specialist; Randy E. Fong, AFE, Examiner-in-Charge; Edsel R. Dino, Financial Examiner; Katy Bardsley, CPA, Financial Examiner; and Zairina Othman, Financial Examiner; all from the Washington State Office of the Insurance Commissioner, and examiners representing the Indiana Department of Insurance and Illinois Department of Insurance, participated in the examination and in the preparation of this report.

Respectfully submitted,



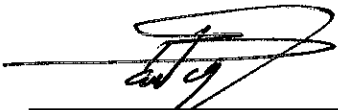
Tarik Subbagh, CPA, CFE
Property and Casualty Field Supervising Examiner
State of Washington

AFFIDAVIT

STATE OF WASHINGTON }
 } ss
COUNTY OF KING }

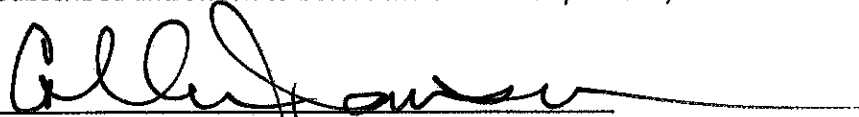
Tarik Subbagh, CPA, CFE, being duly sworn, deposes and says that the foregoing report subscribed by him is true to the best of his knowledge and belief.

He attests that the examination of First National Insurance Company of America was performed in a manner consistent with the standards and procedures required or prescribed by the Washington State Office of the Insurance Commissioner and the National Association of Insurance Commissioners.



Tarik Subbagh, CPA, CFE
Property and Casualty Field Supervising Examiner
State of Washington

Subscribed and sworn to before me this 21st day of June, 2011.



Notary Public in and for the
State of Washington

