



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

ORDER

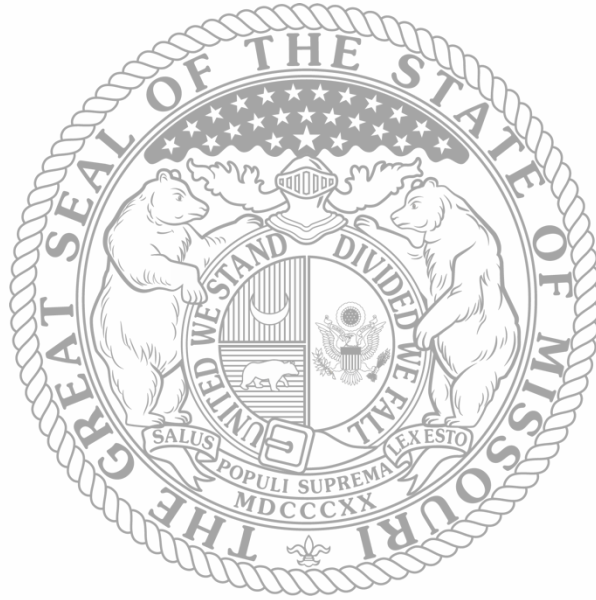
After full consideration and review of the report of the financial examination of Arch Specialty Insurance Company for the period ended December 31, 2024, together with any written submissions or rebuttals and any relevant portions of the examiner's workpapers, I, Angela L. Nelson, Director of the Missouri Department of Commerce and Insurance pursuant to section 374.205.3(3)(a), RSMo, adopt such examination report. After my consideration and review of such report, workpapers, and written submissions or rebuttals, I hereby incorporate by reference and deem the following parts of such report to be my findings and conclusions to accompany this order pursuant to section 374.205.3(4), RSMo: summary of significant finding, company history, management and control, territory and plan of operation, growth of company and loss experience, reinsurance, accounts and records, financial statements, comments on financial statement items, financial statement changes resulting from examination, and summary of recommendations.

Based on such findings and conclusions, I hereby ORDER that the report of the financial examination of Arch Specialty Insurance Company as of December 31, 2024, be and is hereby ADOPTED as filed and for Arch Specialty Insurance Company to take the following action or actions, which I consider necessary to cure any violation of law, regulation or prior order of the Director revealed by such report: (1) account for its financial condition and affairs in a manner consistent with the Director's findings and conclusions.

So ordered, signed and official seal affixed this 29th day of June, 2026.



Angela L. Nelson, Director
Department of Commerce and Insurance



REPORT OF
FINANCIAL EXAMINATION OF

ARCH SPECIALTY INSURANCE COMPANY

AS OF
DECEMBER 31, 2024

STATE OF MISSOURI
DEPARTMENT OF COMMERCE & INSURANCE

JEFFERSON CITY, MISSOURI

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Jefferson City, MO
May 19, 2026

Honorable Angela L. Nelson, Director
Missouri Department of Commerce and Insurance
301 West High Street, Room 530
Jefferson City, Missouri 65101

Director Nelson:

In accordance with your financial examination warrant, a full-scope financial examination has been made of the records, affairs, and financial condition of

Arch Specialty Insurance Company (NAIC #21199)

hereinafter referred to as such, as ASIC, or as the Company. Its primary office is located at Harborside 3, 210 Hudson Street, Suite 600, Jersey City, New Jersey, 07311, telephone number (201) 743-4000. The fieldwork for this examination began on April 7, 2025, and concluded on the above date.

SCOPE OF EXAMINATION

Period Covered

The Missouri Department of Commerce and Insurance (Department) has performed a multi-state financial examination of ASIC. The last examination of the Company by the Department covered the period of January 1, 2018, through December 31, 2020. The current examination covers the period of January 1, 2021, through December 31, 2024, as well as a review of any material transactions and events occurring subsequent to the examination period through the date of this report.

Procedures

We conducted our examination in accordance with the National Association of Insurance Commissioners (NAIC) *Financial Condition Examiners Handbook (Handbook)*, except where practices, procedures, and applicable regulations of the Department or statutes of the state of Missouri prevailed. The *Handbook* requires that we plan and perform the examination to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the Company, and evaluate system controls and procedures used to mitigate those risks. The examination also includes the identification and evaluation of significant risks that could cause the Company's surplus to be materially misstated, both on a current and prospective basis.

This examination also included a review of significant estimates made by management and evaluation of management's compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. Those activities considered in the examination as key to ASIC included Investments, Underwriting, Claims Handling, Reserving, Reinsurance, and Related Party Transactions. The examination also included a review and evaluation of information technology general controls.

This examination was conducted as part of a coordinated examination of the Arch Insurance Group, which consists of numerous insurance companies domiciled in several states. The Missouri Department of Commerce and Insurance is the lead U.S. state regulator for the group. Along with Missouri, Delaware and Kansas participated in the coordinated examination. The examination was conducted concurrently with the examinations of the Company's Missouri domiciled affiliates, Arch Indemnity Insurance Company (AIIC), Arch Property Casualty Insurance Company (APCIC), Arch Insurance Company (AIC), and Arch Wilsure Insurance Company (AWIC), formerly known as Watford Insurance Company (WIC).

This examination report includes significant findings of fact, as mentioned in section 374.205 of the Revised Statutes of Missouri (RSMo) (Examination, director may conduct, when...) and general information about the Company and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not included within the examination report but are separately communicated to other regulators and/or the Company.

SUMMARY OF SIGNIFICANT FINDINGS

There were no material adverse findings, significant non-compliance issues, or material changes to the financial statements noted during the examination.

COMPANY HISTORY

General

Arch Specialty Insurance Company (formally known as Rock River Insurance Company) was incorporated on December 22, 1964, under Illinois law, and commenced business effective January 1, 1965. On September 30, 1999, the Company was purchased by Sentry Insurance and redomesticated to Wisconsin in July of 2000. Effective February 1, 2002, ASIC was purchased by Arch Capital Group Ltd (ACGL). Through a series of contributions of its stock within the ACGL group, the Company became a wholly owned subsidiary of Arch Insurance Company. The Company changed its name to Arch Specialty Insurance Company on August 1, 2002, and redomesticated to Nebraska on December 18, 2006, as an excess and surplus lines insurer. The Company redomiciled to Missouri, effective September 30, 2014, as a domestic surplus lines insurer.

Mergers, Acquisitions, and Major Corporate Events

There were no mergers or acquisitions involving the Company during the examination period.

Dividends and Capital Contributions

In 2024, the Company paid a \$100 million dividend to its parent, AIC. No other dividends were declared or paid during the examination period. ASIC did not receive any capital contributions during the examination period.

Surplus Notes

There were no surplus notes issued or outstanding during the examination period.

MANAGEMENT AND CONTROL**Board of Directors**

The Company's Articles of Incorporation specify that the Board of Directors (Board) shall consist of between nine and twenty-five members. The Directors elected and serving as of December 31, 2024, were as follows:

Name and Address**Principal Occupation and Business Affiliation**

Catherine B. Kelly Minneapolis, MN	Executive Vice President and Director of Corporate Underwriting Arch Insurance Company and subsidiaries
Valerie I.D. Turpin Tucson, AZ	Executive Vice President and Chief Underwriting Officer Arch Insurance Company and subsidiaries
Thomas J. Ahern Ridgewood, NJ	Executive Vice President, Chief Financial Officer, and Treasurer Arch Insurance Company and subsidiaries
Brian D. First Canton, CT	President Arch Insurance Company and subsidiaries
Regan A. Shulman Larchmont, NY	Executive Vice President, General Counsel, and Secretary Arch Insurance Company and subsidiaries
Patrick K. Nails Yardley, PA	Executive Vice President and Chief Claims Officer Arch Insurance Company and subsidiaries
Andrew S. Becker Towaco, NJ	Executive Vice President and Chief Actuary Arch Insurance Company and subsidiaries
John A. Rafferty Western Springs, IL	Executive Vice President and Chief Underwriting Officer Arch Insurance Company and subsidiaries
Richard A. Stock Eagan, MN	Executive Vice President and Chief Underwriting Officer Arch Insurance Company and subsidiaries
Matthew A. Shulman New Canaan, CT	Chief Executive Officer Arch Insurance Company and subsidiaries

Senior Officers

The officers elected and serving, as of December 31, 2024, were as follows:

Name**Office**

Brian D. First	President
Regan A. Shulman	Executive Vice President, General Counsel, and Secretary
Thomas J. Ahern	Executive Vice President, Chief Financial Officer, and Treasurer
Andrew S. Becker	Executive Vice President and Chief Actuary
Richard A. Stock	Executive Vice President and Chief Underwriting Officer
Catherine B. Kelly	Executive Vice President and Director of Corporate Underwriting
Valerie I.D. Turpin	Executive Vice President and Chief Underwriting Officer
John A. Rafferty	Executive Vice President and Chief Underwriting Officer

Principal Committees

ASIC's Board of Directors designates the ACGL Audit Committee to act as its Audit Committee. As of December 31, 2024, ACGL's Audit Committee consisted of Eileen Mallesch (Chair), Laurie Goodman, Francis Ebong, Moira Kilcoyne, and Eugene Sunshine. ACGL's Board determined that all the Audit Committee members were independent under the applicable standards of NASDAQ and the Securities Exchange Act of 1934, and that Ms. Mallesch qualifies as a financial expert under the rules of the Securities and Exchange Commission.

ASIC has also established various management committees to provide additional oversight and guidance. The management committees established as of December 31, 2024, included the Anti-Fraud Controls Steering Committee, the Reinsurance Steering Committee, the Information Technology Steering Committee, the Reserve Review Committee, the Information Governance Steering Committee, the Enterprise Risk Management Committee, and the Privacy and Security Committee.

Corporate Records

The Company's Articles of Incorporation and Bylaws were reviewed for any changes during the period under examination. There were no revisions to either document during the examination period. The minutes of the Board of Directors' meetings and Committee meetings were reviewed for the period under examination.

Holding Company, Subsidiaries, and Affiliates

ASIC is a member of an insurance holding company system as defined by section 382.010, RSMo (Definitions). ASIC is directly owned by AIC, a Missouri domestic insurer that is wholly owned by Arch Reinsurance Company, a Delaware-domiciled insurer. ASIC and its affiliates are ultimately owned by ACGL, a Bermuda-based publicly held limited liability company. ACGL is traded on the NASDAQ National Market under the symbol ACGL. The Vanguard Group owned approximately 10.9% of the outstanding common shares of ACGL as of December 31, 2024.

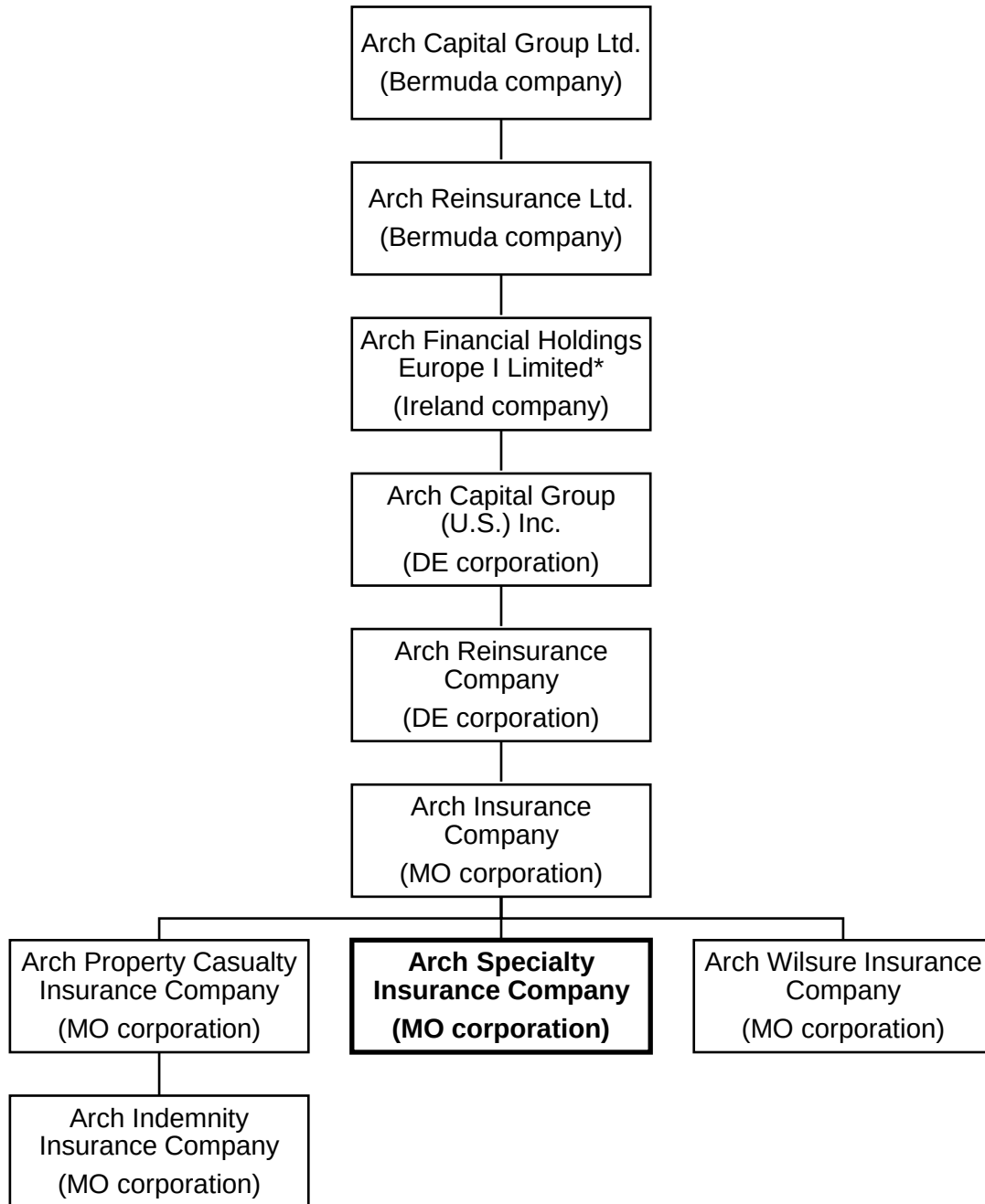
ACGL provides insurance, reinsurance and mortgage insurance on a worldwide basis through its wholly owned subsidiaries and classifies its businesses into three underwriting segments: insurance, reinsurance and mortgage. The insurance segment product lines include commercial automobile; commercial multiperil; other liability – claims made, which includes financial and professional lines; other liability – occurrence, which includes admitted and excess and surplus casualty lines; property and short-tail specialty; workers compensation; and other.

ASIC is affiliated with the following insurance companies within the North American insurance segment of ACGL:

- **Arch Insurance Company:** AIC is licensed in all 50 states, the District of Columbia (D.C.), and three territories. AIC's strategy is to focus on writing specialty lines of business through various avenues, while specializing in writing commercial lines property and casualty business. AIC's current insurance operations consist of the following business units: Lenders, Guarantee Cost Comp, P&C Programs, Small Commercial, Alternative Markets, Construction, E&S Casualty, Entertainment, Executive Assurance, Healthcare, High Excess Comp, Midcorp, National Accounts, Professional Liability, Property, Retail Energy, Surety, Travel & Accident. AIC assumes 100% of the net retained liabilities of its subsidiaries.
- **Arch Property Casualty Insurance Company:** APCIC is licensed in Missouri and in 46 other jurisdictions including the District of Columbia. APCIC is seeking to expand its licenses in the remaining states where it currently does not hold a license. It is not currently writing a material amount of business. All previous business is in runoff and is ceded to AIC.
- **Arch Indemnity Insurance Company:** AIIC is a Missouri domestic property and casualty insurance company licensed in all states and the District of Columbia. AIIC is a wholly owned subsidiary of APCIC, making AIIC an indirect subsidiary of AIC through AIC's ownership of APCIC. AIIC primarily writes workers' compensation insurance.
- **Arch Wilsure Insurance Company (formerly known as Watford Insurance Company):** AWIC is a fully licensed Missouri domestic property and casualty company. AWIC is a wholly owned subsidiary of AIC. AWIC was purchased by AIC from its affiliate Watford Specialty Insurance Company (WSIC) on July 1, 2024, and changed its name effective May 7, 2025. AWIC writes business through managing general underwriters on a program basis; however, as of December 31, 2024, all program business was in runoff. AWIC is licensed in all fifty states and the District of Columbia, and intends to underwrite the following coverages in the future: commercial automobile, general liability, property, umbrella, and workers' compensation.

Organizational Chart

The following organizational chart depicts an abbreviated section of insurance companies within the holding company group as of December 31, 2024. All subsidiaries are wholly owned unless otherwise noted.



*Arch Financial Holdings Europe I Limited has a 90% interest in Arch Capital Group (U.S.) Inc. Arch Reinsurance Europe Underwriting Designated Activity Company owns the other 10%.

Intercompany Transactions

The following is a brief description of significant agreements with affiliated entities that were in effect as of December 31, 2024:

Amended and Restated Investment Manager Agreement: This agreement, effective January 1, 2015, is between ASIC and Arch Investment Management Ltd. (AIML). Per the agreement, AIML provides investment management services on behalf of ASIC. The services include the investment and reinvestment of the Company's assets, the reporting of the market value of investments, the reconciliation of accounting, transaction, and investment summary data with custodian reports, and the appointment of brokers. Services by AIML also include the engagement of third-party investment managers as deemed necessary, as well as the supervision and oversight of any third-party investment manager's activities.

Service Agreement: This agreement, effective February 1, 2002, is between ASIC and Arch Insurance Group Inc. (AIGI). Per the agreement, AIGI provides ASIC with supervision of all phases of its operations, including, but not limited to, accounting services, data processing services, information technology services, legal services, underwriting services, claims handling services, and actuarial services. AIGI is compensated the direct costs incurred in providing services without any additional mark-ups or fees

Amended and Restated Tax Sharing Agreement: This agreement, amended and restated effective October 31, 2022, is between Arch Capital Group (U.S.) Inc. (ACGI) and various subsidiaries (including AIC, ASIC, APCIC, AIIC, and AWIC). Per the agreement, ACGI collects from or refunds to each subsidiary the amount of taxes or benefits determined as if the subsidiary filed a separate return.

Claims Services Agreement: This agreement, originally effective December 6, 2018 and amended effective March 15, 2024, is between AIC, ASIC, APCIC, AIIC, and McNeil & Company, Inc. (McNeil). Per the agreement, McNeil is responsible for processing and settling claims associated with the Program and Producer agreements.

The Company also has a reinsurance agreement with AIC that is described under the Ceded Reinsurance section of this report.

TERRITORY AND PLAN OF OPERATION

ASIC is licensed as a domestic surplus lines insurer in Missouri under Chapter 384 RSMo (Surplus Line Insurance) and is approved to write excess and surplus lines insurance in the other 49 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. ASIC focuses on writing specialty lines of insurance and provides a wide range of excess and surplus lines property and casualty insurance for business and professional firms nationwide. The states with the largest percentage of direct written premium in 2024 were California, New York, Texas, and Florida, accounting for over 46% of the direct premium written total.

GROWTH OF COMPANY AND LOSS EXPERIENCE

The Company maintains reinsurance agreements with AIC and other non-affiliated reinsurers under which it cedes 100% of its direct business. Therefore, ASIC's net premiums written and earned for the examination period were essentially zero, and the Company reported immaterial credit balances for losses incurred during each year under examination. ASIC's direct premiums written increased each year of the exam due to normal business operations.

REINSURANCE

General

ASIC's premium activity on a direct written, assumed, and ceded basis for the period under examination is detailed below:

(\$000s omitted)

Premium Type	2021	2022	2023	2024
Direct Premiums Written	\$ 977,403	\$ 1,356,158	\$ 1,469,439	\$ 1,644,934
Reinsurance Assumed:				
Affiliates	-	-	-	-
Non-Affiliates	2,430	3,415	5,352	7,478
Reinsurance Ceded:				
Affiliates	776,390	1,119,850	1,238,238	1,389,831
Non-Affiliates	203,443	239,776	236,554	262,583
Net Premiums Written	\$ -	\$ (54)	\$ -	\$ -

Assumed Reinsurance

The Company assumes immaterial amounts of business from various non-affiliated insurers, mostly on a facultative basis. Assumed premiums accounted for less than 1% of gross premiums written for each year of the examination period.

Ceded Reinsurance

ASIC and its other North American affiliates manage gross and net exposures through various reinsurance treaties with external reinsurers on a facultative, quota share, per risk excess of loss, and catastrophe excess of loss basis. For 2024, ASIC and its other North American affiliates purchased workers' compensation catastrophe coverage up to \$100 million in excess of \$50 million. Additionally, the property catastrophe agreements covered losses up to \$400 million in excess of \$300 million.

ASIC's most significant reinsurer during the examination period was its affiliate, AIC, with ceded premiums of \$1.3 billion (79.3% of total premiums ceded) in 2024 and a net amount recoverable of \$2.0 billion (75.0% of total net amounts recoverable from reinsurers) at year-end 2024. ASIC ceded premiums of \$262.6 million (15.9% of total premiums ceded) to non-affiliated reinsurers in 2024 and reported a net recoverable of \$559.1 million (20.6% of total net amounts recoverable from reinsurers) from non-affiliated reinsurers at year-end 2024. None of the non-affiliated reinsurers had net amounts recoverable that exceeded 3% of total net amounts recoverable.

The Company is contingently liable for all reinsurance losses ceded to others. This contingent liability would become an actual liability in the event that an assuming reinsurer should fail to perform its obligations under its reinsurance agreement with the Company.

ACCOUNTS AND RECORDS

Independent Auditor

The certified public accounting (CPA) firm, PricewaterhouseCoopers LLP, in New York, NY, performed the statutory audit of the Company for the years under examination. Reliance was placed on the CPA workpapers as deemed appropriate. Such reliance included, but was not limited to, fraud risk analysis, journal entry testing, internal control narratives, tests of internal controls, and substantive testing.

Actuarial Opinion

The Company's actuarial opinion regarding loss reserves, loss adjustment expense (LAE) reserves, and other actuarial items was issued by Gregory Babushkin, FCAS, MAAA, for all years in the examination period. Mr. Babushkin is employed by Arch Insurance Group Inc., an affiliate of Arch Insurance Company located in Jersey City, New Jersey.

Consulting Actuary

Pursuant to a contract with the Department, Solomon L. Frazier, FCAS, FSA, MAAA, Senior Consulting Actuary with Examination Resources, LLC., reviewed the underlying actuarial assumptions and methodologies used by ASIC to determine the adequacy of loss reserves and LAE reserves. Mr. Frazier determined that the Company made a reasonable provision for the loss and LAE reserves that were reported in the statutory financial statements, as of December 31, 2024.

Information Systems

Kimberly Dobbs, CFE, AES, CISA, Information Systems Financial Examiner-in-Charge with the Department, conducted a review of the Company's information systems.

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the Department and present the financial condition of ASIC for the period ending December 31, 2024. The accompanying comments on financial statements reflect any examination adjustments to the amounts reported in the financial statements and should be considered an integral part of the financial statements. The failure of any column of numbers to add to its respective total is due to rounding or truncation.

There may have been additional differences found in the course of this examination, which are not shown in the "Comments on Financial Statement Items." These differences were determined to be immaterial concerning their effect on the financial statements, and therefore were only communicated to the Company and noted in the workpapers for each individual key activity.

ASSETS

As of December 31, 2024

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$ 373,521,219	\$ -	\$ 373,521,219
Cash, Cash Equivalents, and Short-Term Investments	50,058,115	-	50,058,115
Other Invested Assets	3,383,530	-	3,383,530
Investment Income Due and Accrued	3,472,443	-	3,472,443
Premiums and Considerations:			
Uncollected Premiums and Agents' Balances in the Course of Collection	64,785,502	12,567,365	52,218,137
Deferred Premiums, Agents' Balances, and Installments Booked but Deferred and Not Yet Due	115,150,699	-	115,150,699
Reinsurance:			
Amounts Recoverable from Reinsurers	128,792,254	-	128,792,254
Current federal and foreign income tax recoverable and interest thereon	3,182,380	-	3,182,380
Receivables from Parent, Subsidiaries, and Affiliates	62,896,766	59,277	62,837,489
Aggregate Write-Ins for Other-Than-Invested Assets	54,660,890	3,706,611	50,954,279
TOTAL ASSETS	\$ 859,903,798	\$ 16,333,253	\$ 843,570,545

LIABILITIES, SURPLUS AND OTHER FUNDS

As of December 31, 2024

Losses	\$ (69,652)
Loss Adjustment Expenses	80,777,299
Commissions Payable, Contingent Commissions, and Other Similar Charges	16,464,380
Other Expenses	117,853
Unearned Premiums	(11)
Advance Premium	496,591
Ceded Reinsurance Premiums Payable (Net of Ceding Commissions)	311,762,266
Funds Held by Company Under Reinsurance Treaties	16,889,880
Amounts Withheld or Retained by Company for Account of Others	57,293,412
Remittances and Items Not Allocated	13,655,501
Provision for Reinsurance	5,137,775
Payable to Parent, Subsidiaries, and Affiliates	26,654,177
Aggregate Write-Ins for Liabilities	83,986,989
TOTAL LIABILITIES	\$ 613,166,460
Common Capital Stock	5,000,000
Gross Paid In and Contributed Surplus	233,419,614
Unassigned Funds (Surplus)	(8,015,529)
TOTAL CAPITAL AND SURPLUS	\$ 230,404,085
TOTAL LIABILITIES AND SURPLUS	\$ 843,570,545

STATEMENT OF INCOME
For the Year Ended December 31, 2024

Premiums Earned	\$ (243)
DEDUCTIONS:	
Losses Incurred	(163,628)
Loss Adjustment Expenses Incurred	48,054,110
Other Underwriting Expenses Incurred	(22,373,691)
Total Underwriting Deductions	<u>\$ 25,516,791</u>
Net Underwriting Gain (Loss)	\$ (25,517,034)
Net Investment Income Earned	22,331,126
Net Realized Capital Gains (Losses)	(8,122,102)
Net Investment Gain (Loss)	\$ 14,209,024
Net Gain (Loss) from Agents' or Premium Balances Charged Off	(1,943,543)
Aggregate Write-Ins for Miscellaneous Income	(12,373)
Federal and Foreign Income Taxes Incurred	2,429,090
NET INCOME (LOSS)	<u>\$ (15,693,016)</u>

RECONCILIATION OF CAPITAL AND SURPLUS
Changes from January 1, 2021, to December 31, 2024

(\$000s omitted)

	2021	2022	2023	2024
Capital and Surplus, Beginning of Year	\$ 339,377	\$ 344,666	\$ 350,878	\$ 362,015
Net Income (Loss)	9,559	(2,526)	(779)	(15,693)
Change in Net Unrealized Capital Gains (Losses) Less Capital Gains Tax	(2,374)	(1,721)	(765)	(355)
Change in Net Deferred Income Tax	2,680	(935)	(373)	(15,768)
Change in Nonadmitted Assets	103	6,551	13,549	4,674
Change in Provision for Reinsurance	(4,679)	4,844	(495)	(4,470)
Dividends to Stockholder	-	-	-	(100,000)
Net Change in Capital and Surplus	<u>\$ 5,289</u>	<u>\$ 6,212</u>	<u>\$ 11,137</u>	<u>\$ (131,611)</u>
Capital and Surplus, End of Year	<u>\$ 344,666</u>	<u>\$ 350,878</u>	<u>\$ 362,015</u>	<u>\$ 230,404</u>

COMMENTS ON FINANCIAL STATEMENT ITEMS

None.

FINANCIAL STATEMENT CHANGES RESULTING FROM EXAMINATION

None.

SUMMARY OF RECOMMENDATIONS

None.

SUBSEQUENT EVENTS

There were no significant subsequent events noted from December 31, 2024, through the date of this report.

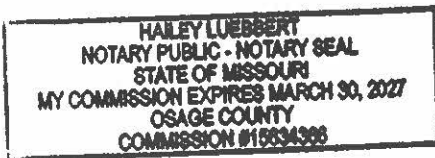
ACKNOWLEDGMENT

The assistance and cooperation extended by the officers and the employees of Arch Specialty Insurance Company during the course of this examination is hereby acknowledged and appreciated. In addition to the undersigned, Kimberly Dobbs, CFE, AES, CISA, Kim Waller, CFE, Alicia Galm, CFE, Brad Brunton, CFE, and James Le, CPA, CFE, CPCU, examiners for the Missouri Department of Commerce and Insurance, also participated in this examination.

VERIFICATION

State of Missouri)
) ss
 County of Cole)

I, Marc Peterson, on my oath swear that to the best of my knowledge and belief the above examination report is true and accurate and is comprised of only facts appearing upon the books, records, or other documents of Arch Specialty Insurance Company, its agents or other persons examined, or as ascertained from the testimony of its officers or agents or other persons examined concerning its affairs, and such conclusions and recommendations as the examiners find reasonably warranted from the facts.



Marc Peterson

Marc Peterson, CFE
 Examiner-In-Charge
 Missouri Department of Commerce and
 Insurance

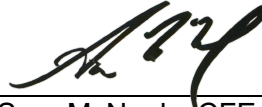
Sworn to and subscribed before me this 27th day of May, 2026.

My commission expires: March 30, 2027
Haley Luebert
 Notary Public



SUPERVISION

The examination process has been monitored and supervised by the undersigned. The examination report and supporting workpapers have been reviewed and approved. Compliance with NAIC procedures and guidelines as contained in the *Financial Condition Examiners Handbook* has been confirmed, except where practices, procedures, and applicable regulations of the Missouri Department of Commerce and Insurance and statutes of the state of Missouri prevailed.



Sara McNeely, CFE
Assistant Chief Financial Examiner
Missouri Department of Commerce and
Insurance