

## **AMENDED FILING COVER SHEET**

Amended File Title	Amended Explanation
Jurat	Included for amended filing
Notes to Financial Statements	Amended Filing due to incomplete notes
General Interrogatories - Part 1	Amended filing due to incomplete responses
Supplemental Compensation Exhibit	Amended filing due to incomplete data



51632201620100105

## ANNUAL STATEMENT

For the Year Ended December 31, 2016  
OF THE CONDITION AND AFFAIRS OF THE

## EnTitle Insurance Company

NAIC Group Code	3483 (Current Period)	3483 (Prior Period)	NAIC Company Code	51632	Employer's ID Number		34-1252928
Organized under the Laws of	OH		, State of Domicile or Port of Entry		OH		
Country of Domicile	US						
Incorporated/Organized	April 7, 1978		Commenced Business		April 7, 1978		
Statutory Home Office	3 Summit Park Drive, Suite 525 (Street and Number)		, Independence, OH, US 44131 (City or Town, State, Country and Zip Code)				
Main Administrative Office	3 Summit Park Drive, Suite 525 Independence, OH, US 44131 (Street and Number)		216-524-3400 (Area Code)		216-524-3400 (Telephone Number)		
Mail Address	3 Summit Park Drive, Suite 525 (Street and Number or P.O. Box)		, Independence, OH, US 44131 (City or Town, State, Country and Zip Code)				
Primary Location of Books and Records	3 Summit Park Drive, Suite 525 (Street and Number)		Independence, OH, US 44131 (City or Town, State, Country and Zip Code)		216-524-3400 (Area Code) (Telephone Number)		
Internet Web Site Address	www.entitledirect.com						
Statutory Statement Contact	Maryse Jean-Pierre (Name)		216-524-3400 (Area Code)		216-524-3488 (Telephone Number) (Extension)		
	Maryse.Jean-Pierre@Entitledirect.com (E-Mail Address)				216-524-3488 (Fax Number)		

## OFFICERS

	Name	Title
1.	Lee H. Baskey	President
2.	Steven R. Palmer	Secretary
3.	Maryse Jean-Pierre	Assistant Secretary

## VICE-PRESIDENTS

Name	Title	Name	Title
Kimberly Lauderbaugh	Vice President of Operations	Valerie Bradford	Vice President - California Operations
Maria Bocardi	Vice President - Claims Counsel		

## DIRECTORS OR TRUSTEES

Name	Title	Name	Title
Steven R. Palmer	Timothy M. Dwyer	Hanley C. Clark	Lee H. Baskey

State of Ohio .....

County of Cuyahoga ss

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC Annual Statement Instructions and Accounting Practices and Procedures manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

(Signature) Lee H. Baskey (Printed Name) 1. President (Title)	(Signature) Steven R. Palmer (Printed Name) 2. Secretary (Title)	(Signature) Maryse Jean-Pierre (Printed Name) 3. Assistant Secretary (Title)
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Subscribed and sworn to (or affirmed) before me this on this  
day of February , 2017, by

a. Is this an original filing?  Yes  No  
 b. If no: 1. State the amendment number  
 2. Date filed  
 3. Number of pages attached

04/18/2017

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## NOTES TO FINANCIAL STATEMENTS

### NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### **1. Summary of Significant Accounting Policies**

##### **A. Accounting Practices**

The financial statements of EnTitle Insurance Company (the “Company”) have been prepared in conformity with accounting practices prescribed or permitted by the Ohio Department of Insurance and the National Association of Insurance Commissioners (“NAIC”).

The Ohio Department of Insurance does not allow any prescribed or permitted practices for determining and reporting the financial condition and results of operations of a title insurance company and for assessing its solvency.

Reconciliation of the Company’s net income and capital & surplus between NAIC SAP and the State of Ohio is shown below.

##### **Net Income**

	<b><u>12/31/2016</u></b>	<b><u>12/31/2015</u></b>
EnTitle Insurance Company – Ohio Basis	(2,327,632)	(304,500)
State Prescribed Practices that increase/decrease		
NAIC SAP	-	-
State Permitted Practices that increase/decrease		
NAIC SAP	-	-
NAIC SAP	(2,327,632)	(304,500)

##### **Surplus**

	<b><u>12/31/2016</u></b>	<b><u>12/31/2015</u></b>
EnTitle Insurance Company – Ohio Basis	8,509,955	9,377,208
State Prescribed Practices that increase/decrease		
NAIC SAP	-	-
State Permitted Practices that increase/decrease		
NAIC SAP	-	-
NAIC SAP	8,509,955	9,377,208

##### **B. Use of Estimates in the Preparation of the Financial Statements**

The preparation of financial statements, in conformity with Statutory Accounting Principles, requires management to make estimates and assumptions that affect amounts reported in the financial statements and accompanying notes. Such estimates and assumptions could change in the future as more information becomes known and impacts the amounts reported and disclosed in the Financial Statements.

##### **C. Accounting Policy**

For premiums written in Ohio, Ohio insurance law requires the Company to establish an unearned premium reserve equal to 10% of the premium retained by the Company. The Company may release .5% of that which was added to the reserve during the previous 20 years. For all other states where the Company writes insurance, the Company follows the various state insurance department regulations when determining what statutory premium reserves are established. Premiums on title insurance policies issued by the Company are recognized as revenue when the Company is legally or contractually entitled to collect the premium. Premiums from title policies issued by the Company through independent agents are recognized when the policies are reported by the agent.

## NOTES TO FINANCIAL STATEMENTS

Case loss and loss adjustment expense reserves are recorded for outstanding known claims at the time of determination.

Investments in bonds are generally reported at amortized cost, using the effective interest method, unless the National Association of Insurance Commissioners' (NAIC) rating specifies another value. Held-to-maturity investments are reported at amortized cost, and the remaining investments are at fair value, with unrealized holding gains and losses reported in operations for those designated as trading, and as a separate component of shareholder's equity for those designated as available-for-sale. Non-agency residential mortgage backed securities (RMBS) are valued using the NAIC financial model as approved by the Valuation of Securities Task Force and Financial Condition Committee.

Common stock is carried at NAIC prescribed market values.

D. Going Concern: Not applicable

**2. Accounting Changes and Correction of Errors**

None

**3. Business Combinations and Goodwill**

None

**4. Discontinued Operations**

None

**5. Investments**

A. Mortgage Loans - Not applicable

B. Debt Restructuring - Not applicable

C. Reverse Mortgages - Not applicable

D. Loan-Backed Securities – Not applicable

E. Repurchase Agreements – Not applicable

F. Real Estate – Not applicable

G. Low Income Housing Tax Credits – Not applicable

H. Restricted Assets – Refer to General Interrogatories Part 2 – 5.2

I. Working Capital Finance Investments – Not applicable

J. Offsetting and Netting of Assets and Liabilities – Not applicable

K. Structured Notes – Not applicable

L. 5\* Securities – Not applicable

**6. Joint Ventures, Partnerships and Limited Liability Companies**

a. None

## NOTES TO FINANCIAL STATEMENTS

### 7. Investment Income

a. Investment income is recorded on the accrual basis of accounting with the appropriate adjustments made for amortization of premium and accretion of discounts relating to bonds and notes acquired at other than par value. Dividends on stocks are credited to income on the ex-dividend date. Realized gains or losses on disposition of securities owned are determined on a specific identification basis and are reflected in the statement of income. Unrealized investment gains or losses are credited or charged directly to unassigned surplus net of allowed deferred income taxes. At December 31, 2016, the Company had no bonds or note investments in default as to principal and/or interest. Excluding U.S. Government fixed maturity securities; the company is not exposed to any significant concentration of credit risk.

### 8. Derivative Instruments

a. None

### 9. Income Taxes

A. The components of the net deferred tax asset (liability) at December 31 are as follows:

1.

	<b>12/31/2016</b>		
	<b>Ordinary</b>	<b>Capital</b>	<b>Total</b>
	<b>(1)</b>	<b>(2)</b>	<b>(3)</b>
(a) Gross Deferred Tax Assets	5,799,180	5,122	5,804,302
(b) Statutory Valuation Allowance Adjustment	<u>5,799,180</u>	<u>5,122</u>	<u>5,804,302</u>
(c) Adjusted Gross Deferred Tax Assets (1a-1b)	-	-	-
(d) Deferred Tax Assets Non Admitted	-	-	-
(e) Subtotal Net Admitted Deferred Tax Asset(1c-1d)	-	-	-
(f) Deferred Tax Liabilities	-	-	-
(g) Net Admitted Deferred Tax asset/(liability) (1e-1f)	-	-	-

	<b>12/31/2015</b>		
	<b>Ordinary</b>	<b>Capital</b>	<b>Total</b>
	<b>(4)</b>	<b>(5)</b>	<b>(6)</b>
(a) Gross Deferred Tax Assets	4,854,209	3,665	4,857,874
(b) Statutory Valuation Allowance Adjustment	<u>4,517,976</u>	-	<u>4,517,976</u>
(c) Adjusted Gross Deferred Tax Assets (1a-1b)	336,233	3,665	339,898
(d) Deferred Tax Assets Non Admitted	68,719	-	68,719
(e) Subtotal Net Admitted Deferred Tax Asset(1c-1d)	<u>267,514</u>	<u>3,665</u>	<u>271,179</u>
(f) Deferred Tax Liabilities	-	-	-
(g) Net Admitted Deferred Tax asset/(liability) (1e-1f)	<u>267,517</u>	<u>3,665</u>	<u>271,179</u>

	<b>Change</b>		
	<b>Ordinary</b>	<b>Capital</b>	<b>Total</b>
	<b>(7)</b>	<b>(8)</b>	<b>(9)</b>
(a) Gross Deferred Tax Assets	944,971	1,457	946,428
(b) Statutory Valuation Allowance Adjustment	<u>1,281,204</u>	<u>5,122</u>	<u>1,286,326</u>
(c) Adjusted Gross Deferred Tax Assets (1a-1b)	(336,233)	(3,665)	(339,898)
(d) Deferred Tax Assets Non Admitted	(68,719)	-	(68,719)
(e) Subtotal Net Admitted Deferred Tax Asset (1c-1d)	<u>(267,514)</u>	<u>(3,665)</u>	<u>(271,179)</u>
(f) Deferred Tax Liabilities	-	-	-
(g) Net Admitted Deferred Tax asset/ (liability) (1e-1f)	<u>(267,514)</u>	<u>(3,665)</u>	<u>(271,179)</u>

2. Admission Calculation Components SSAP No. 101

	<b>12/312016</b>		
	<b>Ordinary</b>	<b>Capital</b>	<b>Total</b>
	<b>(1)</b>	<b>(2)</b>	<b>(3)</b>
a. Federal Income Taxes Paid In Prior Years Recoverable Through Loss Carrybacks.			
b. Adjusted Gross Deferred Tax Assets Expected To Be Realized (Excluding The Amount Of Deferred Tax Assets From 2(a)			

## NOTES TO FINANCIAL STATEMENTS

above) after Application of the Threshold Limitation.  
 (The Lesser of 2(b)1 and 2(b)2 below.)

1. Adjusted Gross Deferred Tax Assets to be Realized following the Balance Sheet Date.
2. Adjusted Gross Deferred Tax Assets Allowed per Limitation Threshold
- c. Adjusted Gross Deferred Tax Assets (Excluding the Amount Of Deferred Tax Assets From 2(a) and 2(b) above) Offset by Gross Deferred Tax Liabilities.
- d. Deferred Tax Assets Admitted as the result of application of SSAP No. 101. Total ( 2(a) + 2(b) + 2(c) )

	<b>12/31/2015</b>		
	<b>Ordinary</b> (4)	<b>Capital</b> (5)	<b>Total</b> (6)
a. Federal Income Taxes Paid In Prior Years Recoverable Through Loss Carrybacks.			
b. Adjusted Gross Deferred Tax Assets Expected To Be Realized (Excluding The Amount Of Deferred Tax Assets From 2(a) above) after Application of the Threshold Limitation. (The Lesser of 2(b)1 and 2(b)2 below.)			
1. Adjusted Gross Deferred Tax Assets to be Realized following the Balance Sheet Date.	271,179	-	271,179
2. Adjusted Gross Deferred Tax Assets Allowed per Limitation Threshold	1,338,045	-	1,338,045
c. Adjusted Gross Deferred Tax Assets (Excluding the Amount Of Deferred Tax Assets From 2(a) and 2(b) above) Offset by Gross Deferred Tax Liabilities.			
d. Deferred Tax Assets Admitted as the result of application of SSAP No. 101. Total ( 2(a) + 2(b) + 2(c) )	271,179	-	271,179

	<b>Change</b>		
	<b>Ordinary</b> (7)	<b>Capital</b> (8)	<b>Total</b> (9)
a. Federal Income Taxes Paid In Prior Years Recoverable Through Loss Carrybacks.			
b. Adjusted Gross Deferred Tax Assets Expected To Be Realized (Excluding The Amount Of Deferred Tax Assets From 2(a) above) after Application of the Threshold Limitation. (The Lesser of 2(b)1 and 2(b)2 below.)			
1. Adjusted Gross Deferred Tax Assets to be Realized following the Balance Sheet Date.	(271,179)	-	(271,179)
2. Adjusted Gross Deferred Tax Assets Allowed per Limitation Threshold	(1,338,045)	-	(1,338,045)
c. Adjusted Gross Deferred Tax Assets (Excluding the Amount Of Deferred Tax Assets From 2(a) and 2(b) above) Offset by Gross Deferred Tax Liabilities.			
d. Deferred Tax Assets Admitted as the result of application of SSAP No. 101. Total ( 2(a) + 2(b) + 2(c) )	(271,179)	-	(271,179)

3.	<b>2016</b>	<b>2015</b>
a. Ratio Percentage Used to Determine Recover Period And Threshold Limitation Amount.	0%	4%
b. Amount Of Adjusted Capital And Surplus Used To Determine Recovery Period And Threshold Limitation In 2(b)2 Above.	8,266,699	8,920,297

4. Impact of Tax Planning Strategies

	<b>12/31/2016</b>		
	<b>Ordinary</b> (1)	<b>Capital</b> (2)	<b>Total</b> (3)
(a) Determination of Adjusted Gross Deferred Tax			

## NOTES TO FINANCIAL STATEMENTS

Assets and Net Admitted Deferred Tax Assets,  
By Tax Character As A Percentage.  
 1 Adjusted Gross DTAs Amount From Note 9A1(c)  
 2 Percentage of Adjusted Gross DTAs By Tax  
 Character Attributable To The Impact of Tax Planning Strategies  
 3 Net Admitted Adjusted Gross DTAs Amount from Note 9A1(e)  
 4 Percentage of Net Admitted Adjusted Gross DTAs by Tax  
 Character Attributable To The Impact of Tax Planning Strategies

	12/31/2015		
	Ordinary	Capital	Total
	(4)	(5)	(6)
a) Determination of Adjusted Gross Deferred Tax Assets and Net Admitted Deferred Tax Assets, By Tax Character As A Percentage			
1 Adjusted Gross DTAs Amount From Note 9A1(c)	339,898	-	339,898
2 Percentage of Adjusted Gross DTAs By Tax Character Attributable To The Impact of Tax Planning Strategies			
3 Net Admitted Adjusted Gross DTAs Amount from Note 9A1(e)	271,179	-	271,179
4 Percentage of Net Admitted Adjusted Gross DTAs by Tax Character Attributable To The Impact of Tax Planning Strategies			

	Change		
	Ordinary	Capital	Total
	(7)	(8)	(9)
a) Determination of Adjusted Gross Deferred Tax Assets and Net Admitted Deferred Tax Assets, By Tax Character As A Percentage			
1 Adjusted Gross DTAs Amount From Note 9A1(c) )	(339,898)	-	(339,898)
2 Percentage of Adjusted Gross DTAs By Tax Character Attributable To The Impact of Tax Planning Strategies			
3 Net Admitted Adjusted Gross DTAs Amount from Note 9A1(e)	(271,179)	-	(271,179)
4 Percentage of Net Admitted Adjusted Gross DTAs by Tax Character Attributable To The Impact of Tax Planning Strategies			

c. Does the Company's Tax-planning Strategies include  
the use of reinsurance? No

C. Current income taxes incurred consist of the following major components:

1. Current Income Tax	12/31/2016	12/31/2015	Change
	(1)	(2)	(3)
a. Federal	-	-	-
b. Foreign	-	-	-
c. Subtotal	-	-	-
d. Federal Income Tax on net capital gains	-	-	-
e. Utilization of capital loss carry-forwards	-	-	-
f. Other	-	-	-
g. Federal and foreign income taxes incurred	-	-	-
2. Deferred Tax Assets			
a. Ordinary	12/31/2016	12/31/2015	Change
	(1)	(2)	(3)
(1) Discounting of unpaid losses	2,070	2,363	(293)
(2) Unearned premium reserve	281,562	269,492	12,070
(3) Policyholder reserves	-	-	-
(4) Investments	-	-	-
(5) Deferred acquisition costs	-	-	-
(6) Policyholder dividends accrual	-	-	-
(7) Fixed assets	57,133	37,849	19,284

## NOTES TO FINANCIAL STATEMENTS

	12/31/2016	2015	2014
(8) Compensation and benefits accrual	22,125	21,505	620
(9) Pension accrual	-	-	-
(10) Receivables – non-admitted	233,298	139,771	93,527
(11) Net operating loss carry-forward	5,202,992	4,383,230	819,762
(13) Other (including items <5% of total ordinary tax assets)	-	-	-
(99) Subtotal	5,799,180	4,854,209	944,970
 b. Statutory valuation allowance adjustment	5,799,180	4,517,976	-
c. Non-admitted	-	68,719	(68,719)
d. Admitted ordinary deferred tax assets (2a99 – 2b – 2c)	-	267,515	(267,515)
 e. Capital:			
(1) Investments	5,122	3,665	1,457
(2) Net capital loss carry-forward	-	-	-
(3) Real estate.	-	-	-
(4) Other (including items <5% of total capital tax assets)	-	-	-
(99) Subtotal.	5,122	3,665	1,457
f. Statutory valuation allowance adjustment	5,122	-	5,122
g. Nonadmitted	-	-	-
h. Admitted capital deferred tax assets (2e99 - 2f - 2g)	-	3,665	(3,665)
i. Admitted deferred tax assets (2d + 2h)	-	271,179	(271,179)
 3. Deferred Tax Liabilities:			
a. Ordinary			
(1) Investments	-	-	-
(2) Fixed assets	-	-	-
(3) Deferred and uncollected premium	-	-	-
(4) Policyholder reserves	-	-	-
(5) Other (including items <5% of total ordinary tax liabilities)	-	-	-
(99) Subtotal	-	-	-
 b. Capital:			
(1) Investments	-	-	-
(2) Real Estate	-	-	-
(3) Other (including items <5% of total capital tax liabilities)	-	-	-
(99) Subtotal	-	-	-
 c. Deferred tax liabilities (3a99 + 3b99)	-	-	-
4. Net deferred tax assets/liabilities (2i - 3c)	-	271,179	(271,179)

### D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate

The significant items causing a difference between the statutory federal income tax rate and the Company's effective income tax rate are as follows:

	<u>12/31/2016</u>	<u>Effective Tax Rate</u>
Provision computed at statutory rate	(790,375)	34.0%
Change in nonadmitted assets	(93,527)	4.0%
Nondeductible Expenses	2,722	-0.1%
Dividends received deduction	-	0.0%
Effect of deferred income taxes		
Adjusted through equity	881,180	37.9%
Other	-	0.0%
Totals	0	0.0%

## NOTES TO FINANCIAL STATEMENTS

Change in statutory valuation allowance	1,286.326	-55.3%
Realized capital gains (losses) tax	-	0.0%
Change in net deferred income taxes	(271,179)	11.7%
	1,015,147	-43.6%

### E. Operating Loss and Tax Credit Carryforwards

1. At December 31, 2016, the Company has net operating loss carryforwards of \$15,302,469 available to offset against future taxable income.
2. The following is income tax expense for 2016 and 2015 that is available for recoupment in the event of future net losses:

Year	Amount
2016	\$0
2015	\$0

3. The Company did not have any protective tax deposits under Section 6603 of the Internal Revenue Code.

### F. Consolidated Federal Income Tax Return

1. The Company's federal income tax return is consolidated with the following entities: Entitle Direct Group
2. The method of allocation among companies is subject to a written agreement, approved by the Board of Directors, whereby allocation is made primarily on a separate return basis with current credit for any net operating losses or other items utilized in the consolidated tax return. Intercompany tax balances are settled monthly.

### G. Federal or Foreign Federal Income Tax Loss Contingencies

The Company has no tax loss contingencies for which it is reasonably possible that the total liability will significantly increase within twelve months of the reporting date.

For the quarter ended December 31, 2016 the Company has no current tax expense.

- a. The Company's tax expense at December 31, 2016 differs from the federal statutory rate applied to its pretax net income primarily due to permanent differences between book income and taxable income as a result of tax-exempt interest income, the dividends received deduction, and IRC Section 832 (b)(5)(B).
- b. At December 31, 2016, the Company had an estimated net operating loss of \$15,302,469 available to offset against future taxable income. This net operating loss will begin to expire in 2028.
- c. On September 2, 2008, EnTitle Insurance Company entered into a federal income tax allocation agreement with Entitle Direct Group, Inc. formerly BDT Holdings Inc. EnTitle Insurance Company is included in the Entitle Direct Group, Inc. affiliated group under federal income tax law and such affiliated group plans to file consolidated federal income tax returns. The tax allocation agreement was approved by the Ohio Department of Insurance on August 21, 2008.

## 10. Information Concerning Parent, Subsidiaries and Affiliates

- A. EnTitle Insurance Company (EIC) is a member of a holding company group as described in schedule Y- Part I.

## **NOTES TO FINANCIAL STATEMENTS**

**B.** EnTitle Insurance Company is the sole member and parent of EnTitle LLC, an Ohio limited liability company (the “Company”) incorporated on December 22, 2011. On October 28, 2015, EnTitle Insurance Company became the sole member of EnTitle LLC and on January 12, 2016, EnTitle LLC received a tax identification number. The purpose for which EnTitle LLC was formed was to acquire and invest in real estate and, engage in any other business or activity for which limited liability companies may be formed under Chapter 1705.

There had not been activity recorded into EnTitle LLC’s books prior to December 31, 2015 at which time, the Company purchased a residential property with the intent to resell. The transaction has been accounted for under SSAP 40R, Real Estate Investments, into the LLC book and recorded at a fair value price of \$111,243 inclusive of closing costs, less estimated costs to sell the property.

EnTitle Insurance Company advanced all costs to EnTitle LLC under an intercompany agreement that establishes payment terms as soon as the property is sold and proceeds collected.

On March 18, 2016, EXOR S.p.A., a publicly traded Italian corporation (“EXOR”), acquired, through certain wholly-owned subsidiaries, all the outstanding common shares of PRE. EXOR filed a Form A for the transaction with the Department on September 8, 2015. By Order dated March 7, 2016, the Superintendent of the Ohio Insurance Department approved the acquisition of control of EIC by EXOR. As shown in the Organizational Chart attached as Exhibit A, following the transaction PRE is now 100% owned by Exor N.V.; Exor N.V. is 100% owned by EXOR S.A.; and EXOR S.A. is 100% owned by EXOR. Approximately 51.87% of the ordinary shares of EXOR are held by Giovanni Agnelli e C. S.a.p.az.; Dicembre s.s. holds 32.25% of the voting interest in Giovanni Agnelli e C. S.a.p.az.; and John Elkann (an individual) is the general partner of Dicembre s.s. Accordingly, John Elkann is now the “Ultimate Controlling Person” of EIC by way of John Elkann’s controlling interest in EXOR and EXOR’s indirect ownership of 100% of PRE’s outstanding stock.

Entitle Direct Group (EDG, the parent company of EnTitle Insurance Company (EIC) made the following contributions to EIC which are recorded as type 1 subsequent events: On February 29, 2016, EDG contributed \$1 million to EIC recorded as subsequent event type 1 as of December 31, 2015.

On August 12, 2016, EDG contributed \$.5 million to EIC recorded as subsequent event type 1 as of June 30, 2016.

On February 17, 2017, EDG contributed \$1 million to EIC recorded as subsequent type 1 as of December 31, 2016.

**C.** The dollar amounts of transactions for each of the periods for which the financial statements are presented are as described below and, also in schedule Y-Part 2.

As of December 31, 2016, the company had receivables of \$1,125,360 from parent, subsidiaries and affiliates in the amount of \$1,125,360 of which \$1,000,000 was due from EDG, its parent company and \$125,360 from Entitle LLC, its sole subsidiary.

As of December 31, 2015, the company had receivables from parent, subsidiaries and affiliates in the amount of \$1,111,243 of which \$1,000,000 was due from EDG, its parent company and \$111,243 from Entitle LLC, its sole subsidiary.

**D.** At December 31, 2016 and December 31, 2015, the Company had a receivable from parent subsidiaries and affiliates of \$1,125,360 and \$1,111,243 respectively. Intercompany balances, between EIC and its parent Company, EDG, are settled monthly.

**E.** Guarantees or undertakings: Not Applicable- The Company does not have such transactions with its parent, subsidiaries or affiliates.

## **NOTES TO FINANCIAL STATEMENTS**

**F.** The Company is a party to a tax sharing agreement approved by the Ohio Department of Insurance on August 21, 2008 and, effective as of September 2, 2008 beginning with 2007 tax year.

EDG, the parent company provides certain management advisory and administrative services to EIC under the company's Intercompany Management Advisory, Administrative Services, and Cost Allocation Agreement (The "Agreement"). This agreement was approved by the Ohio Department of Insurance on May 17, 2016 and, is effective for a 5-year term starting April 15, 2016 barring withdrawal from either party with 30 days' written notice. The allocation method of these costs sharing arrangements between the parties is provided in the Agreement. These costs are included in the Statement of Income under operating expenses incurred-line 5.

**G.** All outstanding shares of the Company are owned by the Parent Company, Entitle Direct Group.

**H.** The company owns no shares of stock of its ultimate parent.

**I.** Shares of stock of affiliated or related parties: Not Applicable

**J.** Impairment Write Downs: Not Applicable

**K.** Foreign Insurance company subsidiaries: Not Applicable

**L.** Downstream non-insurance holding companies: Not Applicable

**M.** All Subsidiary, Controlled or Affiliated (SCA) investments (except investments in U.S. insurance SCA entities): Not Applicable

**N.** Insurance SCA investments for which the audited statutory equity reflects a departure from NAIC SAP: Not applicable

**11. Debt**

a. At December 31, 2016, the Company had no debt outstanding.

**12. Retirement Plans, Deferred Compensation, Post-employment Benefits and Compensated Absences and Other Post-Retirement Benefit Plans**

a. The Company's employees participate in a joint-contributory 401(k) plan, which includes Entitle Direct Group, Inc., the Company's parent.

**13. Capital and Surplus, Dividend Restriction and Quasi-Reorganization**

1. At December 31, 2016, the Company had 800 shares of common stock authorized, and 400 shares outstanding with a par value of \$5,000.

2. The Company has no preferred stock outstanding.

3. The Company may pay dividends only from statutory earned surplus, not exceeding the greater of the prior year's net investment income or 10% of the prior year's statutory surplus, without the approval of the Superintendent of Insurance.

4. Not Applicable: The company has not paid any dividends to date.

5. Portion of profit that may be paid in dividends: There are no other restrictions other than described in (3) above.

6. Restrictions placed on unassigned funds (surplus): Not applicable

7. Advances to surplus not repaid: Not Applicable

8. There are no stocks held by the Company, including stock of affiliated companies, for special purposes such:

a. Conversion of preferred stock

b. Employee stock options

c. Stock purchase warrants

9. Changes in balances of special funds: Not Applicable

## NOTES TO FINANCIAL STATEMENTS

10. The portion of unassigned funds (surplus) represented or reduced by cumulative unrealized gains and losses is (\$15,066)
11. Surplus Notes – Not applicable
12. Impact of the restatement in a quasi-reorganization: Not applicable
13. Effective date of quasi-reorganization: Not applicable

### **14. Contingencies**

- A. Contingent Commitments - None
- B. No material Assessments
- C. Gain Contingencies – None
- D. Claims Related Extra Contractual Obligations and Bad Faith Losses Stemming From Lawsuits – None
- E. Joint and Several Liabilities – None
- F. All Other Contingencies:

In the ordinary course of business, the Company is subject to, or party to, pending or threatened litigation, assessments and claims. While it is not possible to predict with certainty the outcome of such matters individually or in the aggregate, management believes that the ultimate result will not have a material adverse effect on the results of operations of the Company.

### **15. Leases**

- 1.a. The company leases its office facilities, title plants and some of its equipment under non-cancellable operating leases expiring at various times through December 2020. Rental expense for December 31, 2016 and as of December 31, 2015 was \$632,295 and \$624,375 respectively.
- b. Certain rental commitments have renewal options extending through the year 2020. Some of these renewals are subject to adjustment in future periods.

2. At December 31, 2016, the minimum aggregate rental commitments are as follows:

Year Ending December 31	Operating Leases
2017	\$528,150
2018	\$357,840
2019	\$188,594
2020	\$ 91,107
2021	\$ 21,398
	<hr/> \$1,187,089

### **16. Information About Financial Instruments With Off-Balance Sheet Risk And Financial Instruments With Concentrations of Credit Risk.**

The Company does not invest in swaps, futures, derivatives or options.

### **17. Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities**

At December 31, 2016, the Company has not sold, transferred or serviced any of its other assets and has not extinguished any of its liabilities.

### **18. Gain or Loss to the Reporting Entity from Uninsured A&H Plans and the Uninsured Portion of Partially Insured Plans**

Not applicable for title insurance companies.

### **19. Direct Premium Written/Produced by Managing General Agents/Third Party Administrators**

Not applicable for title insurance companies.

## NOTES TO FINANCIAL STATEMENTS

### **20. Fair Value Measurements**

Included in bonds in the statutory financial statements are certain financial instruments carried at fair value. The fair value of an asset is the amount at which that asset could be bought or sold in a current transaction between willing parties, that is, other than in a forced or liquidation sale. The fair value of a liability is the amount at which that liability could be incurred or settled in a current transaction between willing parties, that is, other than in a forced or liquidation sale.

Fair values are based on quoted market prices when available. When market prices are not available, fair value is generally estimated using discounted cash flow analyses, incorporating current market inputs for similar financial instruments with comparable terms and credit quality (matrix pricing). In instances where there is little or no market activity for the same or similar instruments, the Company estimates fair value using methods, models, and assumptions that management believes market participants would use to determine a current transaction price. These valuation techniques involve some level of management estimation and judgment which becomes significant with increasingly complex instruments or pricing models. Where appropriate, adjustments are included to reflect the risk inherent in a particular methodology, model, or input used.

The Company's financial assets and liabilities have been classified, for disclosure purposes, based on the SAP 100 hierarchy. The hierarchy gives the highest ranking to fair values determined using unadjusted quoted prices in active markets for identical assets and liabilities (Level 1) and the lowest ranking to fair values determined using methodologies and models with unobservable inputs (Level 3). An asset's or a liability's classification is based on the lowest level input that is significant to its measurement. For example, a Level 3 fair value measurement may include inputs that are both observable (Levels 1 and 2) and unobservable (Level 3). The levels of the fair value hierarchy are as follows:

**Level 1** - Values are unadjusted quoted prices for identical assets and liabilities in active markets accessible at the measurement date.

**Level 2** - Inputs include quoted prices for similar assets or liabilities in active markets, quoted prices from those willing to trade in markets that are not active, or other inputs that are observable or can be corroborated by market data for the term of the instrument. Such inputs include market interest rates and volatilities, spreads and yield curves.

**Level 3** - Certain inputs are unobservable (supported by little or no market activity) and significant to the fair value measurement. Unobservable inputs reflect the Company's best estimate of what hypothetical market participants would use to determine a transaction price for the asset or liability at the reporting date.

The following table provides information as of December 31, 2016 about the Company's financial assets measured at fair value.

	Level 1	Level 2	Level 3	Total	Assets Carried at Fair Value	Assets Not Carried Fair Value	Total
				Fair Value	Fair Value	Fair Value	
US Treasuries	\$3,578,647			\$3,578,647		\$3,587,371	\$3,587,371
Mortgage backed securities (Countrywide)		\$ 52,999		\$ 52,999	\$52,999		\$52,999
Mortgage backed securities (Res Asset)		\$ 7,155		\$7,155		\$ 7,188	\$ 7,188
	\$3,578,647	\$60,154	\$0	\$3,638,801	\$52,999	\$3,594,559	\$3,647,558

- As of December 31, 2016, the reported fair value of EnTitle Insurance Company's investments in Level 2, NAIC designated 1, Residential Asset SEC TR Series 200, issued on April 1, 2004, was \$7,155. These securities are Senior, Targeted Amortization Class Tranche that have a weighted-average coupon rate of 5.675 percent and a weighted-average maturity of 2.21 months. The underlying loans for these securities are normal whole loans with an original credit rating of AAA. The underlying loans have a weighted-average coupon rate of 5.675 percent and a weighted-average maturity of 228 months. The geographical concentration of those underlying loans is the United

## NOTES TO FINANCIAL STATEMENTS

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States. These securities are currently rated BBB (sf) by S&P and are collateralized by Residential Whole Loans with original and current credit enhancement of 4.5% and 17% respectively.

- As of December 31, 2016, the reported fair value of EnTitle Insurance Company's investments in Level 2, 52,999. These securities are Senior Tranches that have a weighted-average coupon rate of 5.649 percent and a weighted-average maturity of 5.88 months. The underlying loans for these securities are normal whole loans with an original credit rating of AAA. The underlying loans have a weighted-average coupon rate of 5.649 percent and a weighted-average maturity of 250 months. The geographical concentration of those underlying loans is the United States. These securities are collateralized by Residential Whole Loans with original and current credit enhancement of 4.5% and -1% respectively.

### **21. Other Items**

- A. Unusual or Infrequent Items – Not applicable
- B. Troubled Debt Restructuring: Debtors Not applicable.
- C. Other Disclosures: The Company holds \$1,056,259 and \$4,422,080 at December 31, 2016 and December 31, 2015 respectively in segregated escrow bank accounts pending the closing of real estate transactions. These accounts are excluded for the Company's financial statements.
- D. Business Interruption Insurance Recoveries – Not applicable
- E. State Transferable and Non-transferable Tax Credit – Not applicable
- F. Sub-Prime Mortgage Related Risk Exposure – Not applicable
- G. Insurance Linked Securities (ILS) Contracts – Not applicable

### **22. Events Subsequent**

The Company recorded a note receivable of \$1 million as of December 31, 2015 as a result of a capital contribution from its parent, Entitle Direct Group. That note was satisfied in cash in February 2016. The note recorded as of December 31, 2015 and subsequent receipt of cash prior to the filing date classified the contribution as a Type 1 Subsequent Event. The Company received approval from the Ohio Department of Insurance for the Type 1 Subsequent Event treatment.

The Company recorded a note receivable of \$.5 million as of June 30, 2016 as a result of a capital contribution from its parent, Entitle Direct Group. That note was satisfied in cash in August 2016. The note recorded as of June 30, 2016 and subsequent receipt of cash prior to the filing date classified the contribution as a Type 1 Subsequent Event. The Company received approval from the Ohio Department of Insurance for the Type 1 Subsequent Event treatment.

The Company recorded a note receivable of \$1 million as of December 31, 2016 as a result of a capital contribution from its parent, Entitle Direct Group. That note was satisfied in cash in February 2017. The note recorded as of December 31, 2016 and subsequent receipt of cash prior to the filing date classified the contribution as a Type 1 Subsequent Event. The Company received approval from the Ohio Department of Insurance for the Type 1 Subsequent Event treatment.

### **23. Reinsurance**

As of December 31, 2016, the company does not have any reinsurance receivable (refer to schedule F). The company does have a policy of reporting individual claims that have combined Known Claims and LAE incurred in excess of \$500,000.

- a. Unsecured Reinsurance Recoverables  
At December 31, 2016, the Company had no unsecured reinsurance recoverables .
- b. Reinsurance Recoverable in Dispute  
At December 31, 2016, the Company had no reinsurance recoverables in dispute.
- c. Reinsurance Ceded  
(1) At December 31, 2016, the Company had no reinsurance liability.

## **NOTES TO FINANCIAL STATEMENTS**

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(2) There is no additional or return commission, predicated on loss experience or on any other form of profit sharing arrangements in this statement as a result of existing contractual arrangements.

- d. Uncollectible Reinsurance  
At December 31, 2016, the Company had no uncollectible reinsurance.
- e. Commutation of Ceded Reinsurance  
At December 31, 2016, there was no commutation of ceded reinsurance.
- f. Retroactive Reinsurance  
At December 31, 2016, the Company had no retroactive reinsurance.
- g. Reinsurance Accounted for as a Deposit  
At December 31, 2016, the Company did not do deposit accounting for any reinsurance agreements.

**24. Retrospectively Rated Contracts & Contracts Subject to Re-determination**  
Not applicable for title insurance companies.

**25. Change in Incurred Losses and Loss Adjustment Expenses**  
At December 31, 2016, there were no significant changes to the reserves for incurred loss and loss adjustment expenses attributable to insured events of prior years.

**26. Inter-company Pooling Arrangements**  
Not applicable for title insurance companies.

**27. Structured Settlements**  
At December 31, 2016, the Company had no structured settlements.

**28. Supplemental Reserve**  
The Company does not use any discounting in the calculation of its supplemental reserve.

**GENERAL INTERROGATORIES****PART 1 – COMMON INTERROGATORIES****GENERAL**

1.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer?

Yes [ X ] No [ ]

If yes, complete Schedule Y, Parts 1, 1A and 2.

1.2 If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations?

Yes [ X ] No [ ] N/A [ ]

1.3 State Regulating?

Ohio

2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity?

Yes [ ] No [ X ]

2.2 If yes, date of change:

3.1 State as of what date the latest financial examination of the reporting entity was made or is being made.

12/31/2011

3.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released.

12/31/2011

3.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date).

05/08/2013

3.4 By what department or departments?

OHIO DEPARTMENT OF INSURANCE

3.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with departments?

Yes [ X ] No [ ] N/A [ ]

3.6 Have all of the recommendations within the latest financial examination report been complied with?

Yes [ X ] No [ ] N/A [ ]

4.1 During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity) receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:

4.11 sales of new business?

Yes [ ] No [ X ]

4.12 renewals?

Yes [ ] No [ X ]

4.2 During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:

4.21 sales of new business?

Yes [ ] No [ X ]

4.22 renewals?

Yes [ ] No [ X ]

5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?

Yes [ ] No [ X ]

5.2 If yes, provide the name of the entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

1 Name of Entity	2 NAIC Company Code	3 State of Domicile
.....	.....	.....
.....	.....	.....

## GENERAL INTERROGATORIES

6.1 Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period?

Yes [ ] No [ X ]

6.2 If yes, give full information:

.....

.....

.....

7.1 Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity?

Yes [ X ] No [ ]

7.2 If yes,

7.21	State the percentage of foreign control.	40.30 %
7.22	State the nationality(s) of the foreign person(s) or entity(s); or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact and identify the type of entity(s) (e.g., individual, corporation, government, manager or attorney-in-fact).	

1 Nationality	2 Type of Entity
Bermudian	Corporation

8.1 Is the company a subsidiary of a bank holding company regulated by the Federal Reserve Board?

Yes [ ] No [ X ]

8.2 If response to 8.1 is yes, please identify the name of the bank holding company.

.....

.....

.....

8.3 Is the company affiliated with one or more banks, thrifts or securities firms?

Yes [ ] No [ X ]

8.4 If response to 8.3 is yes, please provide the names and locations (city and state of the main office) of any affiliates regulated by a federal financial regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

1 Affiliate Name	2 Location (City, State)	3 FRB	4 OCC	5 FDIC	6 SEC
.....	.....	.....	.....	.....	.....

9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?

CLIFTON LARSON ALLEN, LLP; 301 N. NEIL STREET SUITE 205, CHAMPAIGN, IL 61820

.....

.....

.....

10.1 Has the insurer been granted any exemptions to the prohibited non-audit services provided by the certified independent public accountant requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation?

Yes [ ] No [ X ]

10.2 If response to 10.1 is yes, provide information related to this exemption:

.....

.....

.....

10.3 Has the insurer been granted any exemptions related to the other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 18A of the Model Regulation, or substantially similar state law or regulation?

Yes [ ] No [ X ]

10.4 If response to 10.3 is yes, provide information related to this exemption:

.....

.....

.....

## GENERAL INTERROGATORIES

10.5 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? Yes [ X ] No [ ] N/A [ ]

10.6 If the response to 10.5 is no or n/a, please explain.

.....

11. What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?

JOHN PIERCE; 1400 RENAISSANCE DRIVE SUITE 213, PARK RIDGE, IL 60068

.....

12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? Yes [ X ] No [ ]

12.11 Name of real estate holding company	EnTitle, LLC
12.12 Number of parcels involved	1
12.13 Total book/adjusted carrying value	\$ 105,536

12.2 If yes, provide explanation:

REFER TO NOTES TO ANNUAL STATEMENTS, NOTE 10.C

.....

13. FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:

13.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?

.....

13.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? Yes [ ] No [ X ]

13.3 Have there been any changes made to any of the trust indentures during the year? Yes [ ] No [ X ]

13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? Yes [ ] No [ ] N/A [ X ]

14.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?

- a. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- b. Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
- c. Compliance with applicable governmental laws, rules, and regulations;
- d. The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
- e. Accountability for adherence to the code.

Yes [ X ] No [ ]

14.11 If the response to 14.1 is no, please explain:

.....

14.2 Has the code of ethics for senior managers been amended? Yes [ ] No [ X ]

14.21 If the response to 14.2 is yes, provide information related to amendment(s).

.....

## GENERAL INTERROGATORIES

14.3 Have any provisions of the code of ethics been waived for any of the specified officers?

Yes [ ] No [ X ]

14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).

.....  
.....  
.....

15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance where the issuing or confirming bank is not on the SVO Bank List?

Yes [ ] No [ X ]

15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount
.....	.....	.....	.....

## BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the board of directors or a subordinate committee thereof?

Yes [ X ] No [ ]

17. Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof?

Yes [ X ] No [ ]

18. Has the reporting entity an established procedure for disclosure to its board of directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict or is likely to conflict with the official duties of such person?

Yes [ X ] No [ ]

## FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)?

Yes [ ] No [ X ]

20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):

20.11 To directors or other officers	\$ _____
20.12 To stockholders not officers	\$ _____
20.13 Trustees, supreme or grand (Fraternal only)	\$ _____

20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):

20.21 To directors or other officers	\$ _____
20.22 To stockholders not officers	\$ _____
20.23 Trustees, supreme or grand (Fraternal only)	\$ _____

21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reported in the statement?

Yes [ ] No [ X ]

21.2 If yes, state the amount thereof at December 31 of the current year:

21.21 Rented from others	\$ _____
21.22 Borrowed from others	\$ _____
21.23 Leased from others	\$ _____
21.24 Other	\$ _____

22.1 Does this statement include payments for assessments as described in the Annual Statement Instructions other than guaranty fund or guaranty association assessments?

Yes [ X ] No [ ]

## GENERAL INTERROGATORIES

22.2 If answer is yes:

22.21 Amount paid as losses or risk adjustment	\$ _____
22.22 Amount paid as expenses	\$ _____
22.23 Other amounts paid	\$ _____

23.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement?

Yes [X] No [ ]

23.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount:

\$ \_\_\_\_\_ 1,000,000

## INVESTMENT

24.01 Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 24.03)

Yes [X] No [ ]

24.02 If no, give full and complete information, relating thereto:

.....  
 .....

24.03 For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 17 where this information is also provided)

.....  
 .....

24.04 Does the company's security lending program meet the requirements for a conforming program as outlined in the Risk-Based Capital Instructions?

Yes [ ] No [ ] N/A [X]

24.05 If answer to 24.04 is yes, report amount of collateral for conforming programs.

\$ \_\_\_\_\_

24.06 If answer to 24.04 is no, report amount of collateral for other programs.

\$ \_\_\_\_\_

24.07 Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract?

Yes [ ] No [ ] N/A [X]

24.08 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%?

Yes [ ] No [ ] N/A [X]

24.09 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities Lending Agreement (MSLA) to conduct securities lending?

Yes [ ] No [ ] N/A [X]

24.10 For the reporting entity's security lending program, state the amount of the following as of December 31 of the current year:

24.101 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2

\$ \_\_\_\_\_

24.102 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2

\$ \_\_\_\_\_

24.103 Total payable for securities lending reported on the liability page

\$ \_\_\_\_\_

25.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 21.1 and 24.03).

Yes [X] No [ ]

## GENERAL INTERROGATORIES

25.2 If yes, state the amount thereof at December 31 of the current year:

25.21	Subject to repurchase agreements	\$ _____
25.22	Subject to reverse repurchase agreements	\$ _____
25.23	Subject to dollar repurchase agreements	\$ _____
25.24	Subject to reverse dollar repurchase agreements	\$ _____
25.25	Placed under option agreements	\$ _____
25.26	Letter stock or securities restricted as to sale - excluding FHLB Capital Stock	\$ _____
25.27	FHLB Capital Stock	\$ _____
25.28	On deposit with states	\$ _____ 3,587,371
25.29	On deposit with other regulatory bodies	\$ _____
25.30	Pledged as collateral - excluding collateral pledged to an FHLB	\$ _____
25.31	Pledged as collateral to FHLB - including assets backing funding agreements	\$ _____
25.32	Other	\$ _____

25.3 For category (25.26) provide the following:

1 Nature of Restriction	2 Description	3 Amount
.....	.....	.....

26.1 Does the reporting entity have any hedging transactions reported on Schedule DB?

Yes [ ] No [ X ]

26.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state?

Yes [ ] No [ ] N/A [ X ]

If no, attach a description with this statement.

27.1 Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into  
equity, or, at the option of the issuer, convertible into equity?

Yes [ ] No [ X ]

27.2 If yes, state the amount thereof at December 31 of the current year.

\$ \_\_\_\_\_

28. Excluding items in Schedule E - Part 3 - Special Deposits, real estate, mortgage loans and investments held  
physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities,  
owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in  
accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial  
or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook?

Yes [ X ] No [ ]

28.01 For agreements that comply with the requirements of the NAIC Financial Condition Examiners Handbook,  
complete the following:

1 Name of Custodian(s)	2 Custodian's Address
CENTURY TRUST	100 S. FEDERAL PLACE, SANTA FE, NM 87501
BANK OF NEW YORK MELLON TRUST COMPANY N.A.	10161 CENTURION PARKWAY, JACKSONVILLE, FL 32256
XEROX BUSINESS SERVICES, LLC	100 HANCOCK STREET, 10TH FLOOR, QUINCY, MA 02171
WASHINGTON TRUST COMPANY	23 BROAD STREET, WESTERLY, RI 02891
FIRST BANK TRUST N.A.	PO BOX 1347, SIOUX FALLS, SD 57101
HARRIS BANK N.A.	PO BOX 755, CHICAGO, IL 60690
HUNTINGTON NATIONAL BANK	7 EASTON OVAL EA4E95, COLUMBUS, OH 43219
JP MORGAN CHASE	PO BOX 260180, BATON ROUGE, LA 70826
MERRILL LYNCH	1375 EAST 9TH STREET, CLEVELAND, OH 44114
REGIONS BANK	400 WEST CAPITOL, LITTLE ROCK, AR 72201
REGIONS BANK	1900 5TH AVENUE NORTH, SUITE 2500, BIRMINGHAM, AL 35203
WELLS FARGO	1021 E. CARY STREET MAC R3529-062, RICHMOND, VA 23219
US BANK	555 SW OAK STREET, PORTLAND, OR 97204
US BANK	ONE ENTERPRISE STREET 255 EATER ST, SUITE 700, JACKSONVILLE FL
US BANK	ONE WEST FOURTH STREET, WINSTON-SALEM, NC 27101
TEXAS TREASURY TRUST	208 EAST 10TH STREET, AUSTIN, TX 78701

## GENERAL INTERROGATORIES

28.02 For all agreements that do not comply with the requirements of the NAIC Financial Condition Examiners Handbook, provide the name, location and a complete explanation:

1 Name(s)	2 Location(s)	3 Complete Explanation(s)
.....	.....	.....
.....	.....	.....

28.03 Have there been any changes, including name changes, in the custodian(s) identified in 28.01 during the current year? Yes [ ] No [ X ]

28.04 If yes, give full and complete information relating thereto:

1 Old Custodian	2 New Custodian	3 Date of Change	4 Reason
.....	.....	.....	.....
.....	.....	.....	.....

28.05 Investment management - Identify all investment advisors, investment managers, broker/dealers, including individuals that have the authority to make investment decisions on behalf of the reporting entity. For assets that are managed internally by employees of the reporting entity, note as such. ["... that have access to the investment accounts"; "...handle securities"]

1 Name Firm or Individual	2 Affiliation
.....	.....
.....	.....

28.059 For those firms/individuals listed in the table for Question 28.05, do any firms/individuals unaffiliated with the reporting entity (i.e., designated with a "U") manage more than 10% of the reporting entity's assets? Yes [ ] No [ X ]

28.059 For firms/individuals unaffiliated with the reporting entity (i.e., designated with a "U") listed in the table for Question 28.05, does the total assets under management aggregate to more than 50% of the reporting entity's assets? Yes [ ] No [ X ]

28.06 For those firms or individuals listed in the table 28.05 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1 Name Firm or Individual	2 Central Registration Depository Number	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed
.....	.....	.....	.....	.....
.....	.....	.....	.....	.....

29.1 Does the reporting entity have any diversified mutual funds reported in Schedule D – Part 2 (diversified according to the Securities and Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5 (b) (1)])? Yes [ ] No [ X ]

29.2 If yes, complete the following schedule:

1 CUSIP #	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
.....	.....	.....
29.2999 TOTAL		.....

29.3 For each mutual fund listed in the table above, complete the following schedule:

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holding	4 Date of Valuation
.....	.....	.....	.....
.....	.....	.....	.....

## GENERAL INTERROGATORIES

30. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

	1 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
30.1 Bonds	3,647,559	3,638,800	(8,759)
30.2 Preferred stocks			
30.3 Totals	3,647,559	3,638,800	(8,759)

30.4 Describe the sources or methods utilized in determining the fair values:

INTERACTIVE DATA CORP

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31.1 Was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Schedule D?

Yes [ X ] No [ ]

31.2 If the answer to 31.1 is yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic copy) for all brokers or custodians used as a pricing source?

Yes [ X ] No [ ]

31.3 If the answer to 31.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:

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.....

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32.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Investment Analysis Office been followed?

Yes [ X ] No [ ]

32.2 If no, list exceptions:

.....

.....

.....

## OTHER

33.1 Amount of payments to trade associations, service organizations and statistical or Rating Bureaus, if any? \$ 49,140

33.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
American Land Title Association	\$ 22,977
.....	\$
.....	\$

34.1 Amount of payments for legal expenses, if any? \$ 111,037

34.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
Robinson & Cole	\$ 41,843
Zeigler Metzger LLP	\$ 31,445

35.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? \$ \_\_\_\_\_

## GENERAL INTERROGATORIES

35.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
.....	\$ .....
.....	\$ .....
.....	\$ .....