

CAUSE NO. D-1-GV-13-000204

THE STATE OF TEXAS,
Plaintiff,

v.

SANTA FE AUTO INSURANCE
COMPANY,
Defendant.

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IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

419th JUDICIAL DISTRICT

**FINAL ACCOUNTING AND APPLICATION TO TERMINATE RECEIVERSHIP AND
DISCHARGE RECEIVER AND SPECIAL DEPUTY RECEIVER**

TO THE HONORABLE JUDGE OF THIS COURT:

CANTILO & BENNETT, L.L.P., Special Deputy Receiver of Santa Fe Auto Insurance Company (the “SDR” and “Santa Fe” respectively), files this *Final Accounting and Application to Terminate Receivership and Discharge Receiver and Special Deputy Receiver* (the “Application”).

I. INTRODUCTION

1.1 On November 24, 2020, this Court entered its *Order Granting Special Deputy Receiver’s Application to Make Final Distribution and Destroy Records* (the “Distribution Order”).

1.2 The SDR has completed the distribution of assets in accordance with the Distribution Order and submits this final accounting. The SDR requests that the Court terminate this proceeding and discharge the Texas Commissioner of Insurance (“Commissioner”) as Receiver of Santa Fe and CANTILO & BENNETT, L.L.P. as the SDR of Santa Fe.

1.3 The SDR further requests that the Court approve the revised Exhibit 6 to the *Special Deputy Receiver’s Application to Make Final Distribution and Destroy Records* (the “Distribution Application”). Due to a clerical error, the wrong version of Exhibit 6, the Final Distribution

Schedule, was attached to the Distribution Application. All distributions were made pursuant to the correct version of the exhibit.

II. AUTHORITY

2.1 This Application is filed pursuant to § 443.352 of the Texas Insurance Code¹ which provides for the termination of the receivership proceeding. The SDR is authorized to file this Application under § 443.154(a), which vests the SDR with the Receiver's powers and authority, except as limited by the Receiver.

2.2 The subject matter of this Application is referred to the Special Master appointed in this proceeding in accordance with the *Amended Order of Reference to Master* entered on April 5, 2013.

III. FINAL ACCOUNTING

3.1 In accordance with the Distribution Order, the SDR made a distribution of the sum of \$4,656,722 to the Class 1 and Class 2 claimants.

3.2 Distribution Order approved a reserve of \$117,822 for the payment of administrative expenses incurred from September 1, 2020, through the termination of the receivership. Due to unforeseen delays, the actual expenses incurred through September 30, 2021 exceeded the approved amount. The SDR recovered \$358.00 after the Distribution Order was entered from the refund on the SDR's bond. The money is a general asset. The Receiver has authorized the SDR to apply these funds against the administrative expenses that exceeded the approved reserve. Attached as Exhibit A is the final statement of expenses submitted pursuant to § 443.015.

¹ All statutory references herein are to the Texas Insurance Code (the "Code"), unless otherwise indicated.

3.3 Attached hereto are the following final financial statements, which are incorporated by reference:

- a) Statement of Net Assets and Statement of Net Liabilities (Exhibits B-1 and B-2, respectively); and
- b) Sources and Uses of Cash (Exhibit C)

IV. UNCLAIMED FUNDS

4.1 All of the distributions were made by either wire transfer or by cashier's check sent to the address shown on the claimant's Proof of Claim ("POC").

4.2 As of the date of this Application, there is only one unclaimed distribution, in the amount of \$52.14. The distribution, in the form of a cashier's check, was sent by first class mail, in an envelope that contained the SDR's mailing address as the return address, to the claimant's last known address as shown on its POC.

4.3 The SDR continuously monitored the mail for returned distributions. After the distribution was returned, it was determined that the claimant, a law firm, had dissolved and that its members were no longer practicing.

4.4 Additionally, the Distribution Notice issued to one Class 2 claimant was returned as undeliverable. After research, it was determined that the claimant was a healthcare provider whose practice had closed, and the SDR was unable to locate the claimant. The Distribution Order held that any distribution to a claimant for whom the Distribution Notice was returned as undeliverable shall be deemed as unclaimed for purposes of § 443.304. Accordingly, no distribution was made to this claimant, and the funds which would have been distributed (\$1,898.48) will be transferred to the Commissioner.

4.5 All claimants who were entitled to a distribution but did not receive one, whether due to the de minimis size of the distribution or an inability to locate the claimant and amounts that would have been distributed are identified in the attached Exhibit D.² The SDR has delivered the unredacted version of Exhibit D to the Receiver and will deliver the unclaimed funds to the Commissioner.

4.6 The SDR believes that the Commissioner, pursuant to § 443.304, will place the unclaimed funds in a segregated unclaimed funds account.

V. FEDERAL INCOME TAX RETURNS

5.1 The SDR has filed income tax returns with the Internal Revenue Service for years 2013 through 2020. The SDR has also filed a short form 2021 tax return for Santa Fe. No taxes are owed to the Internal Revenue Service.

VI. LICENSE AND CHARTER

6.1 The SDR requests that this Court dissolve Santa Fe's charter pursuant to § 443.153(e)(1).

VII. ASSIGNMENTS AND TRANSFERS

A. Assignment of Non-Cash Assets

7.1 Section 443.154 authorizes the SDR to transfer, abandon, or otherwise dispose of or deal with any property of the insurer upon terms and conditions that are fair and reasonable. Section 443.352 of the Code permits the Court to enter any orders in connection with an application to terminate a receivership proceeding.

7.2 The SDR is not aware of any non-cash assets. In the event any assets, cash or otherwise, are discovered after the termination of this proceeding, the SDR proposes to transfer to

² Individual names are redacted from the filed version of Exhibit D.

the Commissioner any and all remaining assets of Santa Fe, including, but not limited to, assets and rights not known at the time of the termination of this proceeding. A copy of the proposed Assignment to the Commissioner is attached as Exhibit E and incorporated herein by reference. The SDR requests that the Court approve the form of the Assignment and authorize the SDR to execute and deliver it to the Commissioner after entry of the Order.

B. Liquidation and Disposition of Assigned Transferred Assets

7.3 In the event that any assigned transferred assets are collected and liquidated, and such amount is sufficient to justify a distribution, this proceeding may be reopened under § 443.353 of the Code. If such amount cannot be distributed economically, the SDR requests that any such funds be deposited in an account established in accordance with § 443.304(c) of the Code.

VIII. RECORDS

8.1 The Distribution Order authorized the SDR to destroy certain records of Santa Fe that were no longer required for the administration of the receivership. The SDR has completed the destruction of such records and provided certification of same to the Receiver. Santa Fe's remaining records have been inventoried and transferred to the Commissioner. In accordance with the Distribution Order, the Commissioner is authorized to retain, transfer, or otherwise dispose of these records at his or her discretion.

8.2 The Distribution Order also authorized the Texas Property and Casualty Insurance Guaranty Association to maintain or dispose of any Santa Fe records in its possession at its discretion.

IX. APPROVAL OF EXHIBIT 6 TO THE DISTRIBUTION APPLICATION

9.1 As the result of a clerical error, Exhibit 6 to the Distribution Application was the wrong version of the document and contained outdated information. The correct version of Exhibit

6 is attached to this Application as Exhibit F. The figures in the correct Exhibit 6 match the description of the amount and percentages of the distribution of assets contained in the Distribution Application and actually distributed to approved claimants.

X. AUTOMATIC STAY

10.1 In accordance with § 443.008(f), the stay of actions against Santa Fe provided under § 443.008(c) continues until the termination of this proceeding. Upon the entry of a final order terminating this proceeding, the stay of actions against Santa Fe will expire by operation of law.

10.2 Pursuant to § 443.001(b), the stay and the injunctions entered by this Court shall not be construed as a limitation of the Commissioner's powers regarding Santa Fe, including, but not limited to, actions against any licenses issued to Santa Fe, or those acting on its behalf.

10.3 Section 443.014 grants immunity to the Receiver, the SDR, and other assistants and contractors, both present and former. The termination of this proceeding and the automatic stay does not terminate the immunity available under this provision.

XI. TERMINATION AND DISCHARGE

11.1 The SDR requests that this Court issue an order terminating the receivership estate and discharging the Receiver and the SDR.

XII. OFFER OF PROOF

12.1 This Application is verified by the affidavit and certification pursuant to § 443.017(b) by Susan E. Salch, designated representative of CANTILO & BENNETT, L.L.P., as SDR of Santa Fe Auto Insurance Company.

XIII. NOTICE

13.1 In accordance with § 443.007(d) of the Code and the *Amended Order of Reference to Master*, the SDR has served this Application at least 14 days before the submission date on (i)

parties who have filed an appearance in this proceeding and (ii) other parties as determined by the SDR and shown on the Certificate of Service.

PRAYER

WHEREFORE, PREMISES CONSIDERED, CANTILO & BENNETT, L.L.P., Special Deputy Receiver of Santa Fe Auto Insurance Company, respectfully prays that this Court enter an Order:

- a) Granting the Application in all respects;
- b) Accepting and approving in all respects the SDR's Final Accounting, as set out in Exhibits A, B, and C;
- c) Approving the transfer of the funds shown on Exhibit D to the Commissioner;
- d) Approving the form and execution by the SDR of Exhibit E, the Assignment of non-cash assets to the Commissioner after the entry of this Order;
- e) Authorizing the Commissioner to destroy the remaining records of Santa Fe or to transfer such records, at the Commissioner's discretion;
- f) Authorizing TPCIGA to maintain or dispose of any Santa Fe records in its possession at its discretion;
- g) Authorizing the SDR to abandon Santa Fe's license to the Texas Department of Insurance;
- h) Dissolving Santa Fe's charter;
- i) Discharging the Receiver and the SDR;
- j) Approving Exhibit F, the correct version of Exhibit 6 to the Distribution Application;
- k) Terminating this proceeding; and,
- l) Granting the Receiver and the SDR such other relief to which they may be entitled.

Respectfully submitted,

FULLER LAW GROUP

By: /s/Christopher Fuller

Christopher Fuller

Texas Bar No. 07515500

4612 Ridge Oak Drive

Austin, Texas 78731

Telephone: (512) 470-9544

Email: cfuller@fullerlaw.org

Attorney for CANTILO & BENNETT, L.L.P.,
Special Deputy Receiver of Santa Fe Auto
Insurance Company

CERTIFICATE OF SERVICE

I certify that on November 12, 2021, a true and correct copy of the foregoing FINAL ACCOUNTING, APPLICATION TO TERMINATE RECEIVERSHIP AND DISCHARGE RECEIVER AND SPECIAL DEPUTY RECEIVER was served pursuant to the Texas Rules of Civil Procedure and § 443.007(d) on the following by email, except as specifically otherwise noted.

Via Email: Todd.Ridley@santafeinsurance.net

Todd Ridley
13703 Neutron Road
Dallas, TX 75244

Via Email: John.Alexander@tdi.texas.gov

John Alexander
Rehabilitation & Liquidation Oversight
TEXAS DEPARTMENT OF INSURANCE
P.O. Box 149104
Austin, TX 78714-9104

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Vicente Aguillon
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Moses Chao
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Kimberly Hammer
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Special Master's Clerk
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Via First Class Mail
INTERNAL REVENUE SERVICE
Centralized Insolvency Operation
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Philadelphia, PA 19101-7346

Via First Class Mail

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/s/Christopher Fuller
Christopher Fuller

APPLICANT'S NOTICE OF SUBMISSION

Pursuant to the terms of the Order of Reference to Master entered by the District Court in this cause, the SDR's *Final Accounting, Application to Terminate Receivership and Discharge Receiver and Special Deputy Receiver* is hereby set for written submission before the Special Master, Tom Collins, on November 29, 2021.

The Special Master has asked that the following rules be provided you:

1. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the submission date.
2. A copy of any objection shall be served by email by such date on:
 - (a) The Special Master's Docket Clerk, at specialmasterclerk@tdi.texas.gov;
 - (b) The undersigned counsel, Christopher Fuller at cfuller@fullerlaw.org; and
 - (c) All interested parties, including those listed on the SDR's Certificate of Service.
3. The objecting party shall coordinate with the SDR's counsel and the Docket Clerk [(512) 676-6915]] to obtain an oral hearing setting for argument on the Application and Objection, and complete and attach an "Objecting Party's Notice of Oral Hearing" to the objection.
4. The written objection must specifically list all reasons for objection with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally.
5. **Please note that if an objection is not filed as described in the Notice of Submission, the Master may consider the Application without a hearing.**
6. **Failure to file timely a written objection before the Special Master constitutes a waiver of the right to object to the Special Master's recommendation to the District Court.**
7. Any Acknowledgment of Notice and Waiver to be filed by the Guaranty Association or other interested party should be filed at least three (3) calendar days before the submission or hearing date.

/s/ Christopher Fuller/
Christopher Fuller

**SPECIAL DEPUTY RECEIVER'S VERIFICATION AND CERTIFICATION
PURSUANT TO TEX. INS.CODE ANN. §443.017(b)**

AFFIDAVIT OF SUSAN E. SALCH

State of Texas

County of Travis

BEFORE ME, the undersigned authority appeared Susan E. Salch, who after being by me duly sworn, stated the following under oath:

1. "My name is Susan E. Salch. I am of sound mind, capable of making this affidavit, and am competent to testify to the matters contained in this affidavit.
2. I am a partner in CANTILO & BENNETT, L.L.P., the Special Deputy Receiver of Santa Fe Auto Insurance Company (the "SDR" and "Santa Fe" respectively). I am duly authorized to make this Affidavit on behalf of the SDR.
3. I have reviewed the SDR's *Final Accounting and Application to Terminate Receivership and Discharge Receiver and Special Deputy Receiver* and the facts stated therein are true and correct based on my personal knowledge, my review of estate records and my consultation with the staff and subcontractors.
4. I certify that the exhibits, books, accounts, records, papers, correspondence, and/or other records and documents attached hereto were produced pursuant to TEX. INS. CODE § 443.017, are either true and correct copies of records of Santa Fe and were received from the custody of Santa Fe or found among its effects, or were created by and filed with the Receiver's office in connection with the receivership of this delinquent company, and are held by the Special Deputy Receiver in its official capacity."

By: Susan E. Salch
Susan E. Salch

SUBSCRIBED AND SWORN TO BEFORE ME on November 8, 2021, by Susan E. Salch, partner in CANTILO & BENNETT, L.L.P., Special Deputy Receiver of Santa Fe Auto Insurance Company.

[Signature]

Notary Public

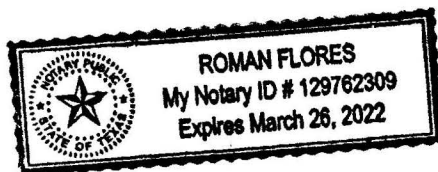


EXHIBIT A

**R-554 Santa Fe Auto Ins Co
Final Statement of Expenses**

EXHIBIT A

For the Period September 1, 2020 through September 30, 2021

SDR

Administration	46,276.44
Expenses	132.98
Total SDR Fees	46,409.42

Estimated Miscellaneous Expenses

Records Storage, Disposal, Shipping	15,029.05
IT Computer Expense - Off Site Server	6,939.75
IT Computer Expense-Destroy/Remove Equip	1,786.58
Property Taxes-Equipment at Data Bank	53.38
Telephone	1,778.76
Copies, Faxes, Postage, Courier	515.62
Bank & Treasury Fees	1,135.86
Total Miscellaneous Expenses	27,239.00

Estimated Subcontractors Fees & Exp

Legal-Consulting	16,653.32
Legal-Consulting	1,292.60
Accounting Subcontractor	14,540.14
Claims/Consulting/Records	6,955.50
IT Services-Consultant	1,440.00
IT Services- Subcontractor	1,949.00
Total Subcontractor Fees & Expenses	42,830.56

Estimated Other Fees & Expenses

Liquidation Oversight Allocated Expenses	1,681.61
Special Master Fees	19.41
Total Other Fees & Expenses	1,701.02

Total Closing Expenses	<u>118,180.00</u>
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EXHIBIT B-1

Santa Fe Auto Insurance Company
Statement of Net Assets

For the Period Ending
09/30/21

Line		
Cash		
1	Cash	
	Cash - Unrestricted	0
	APF Funds (Loan proceeds)	
Investments		
2	Short-Term Investments	
3	Bonds	
4	Stocks - Preferred & Common	
5	Investments in Subsidiaries, Controlled or Affiliated Entities	
6	Mortgage Loans	
7	Real Estate	
8	Policy Loans	
9	Other Invested Assets	
Restricted Assets		
10	Statutory Deposits	
11	Funds held by or deposited with Reinsured Companies	
12	Restricted - Other	
Reinsurance Receivable		
13	Reinsurance Recoverables on Paid Losses & LAE (net of allowance)	
14	Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)	
15	Reinsurance Recoverables on UEP & Contingent Commissions	
Other Receivables		
16	Salvage & Subrogation Recoveries	
17	Premiums Due from Agents & Policyholders	
18	Receivable from Parents, Subsidiaries & Affiliates	
19	Receivable from Guaranty Associations - Early Access Payments	
20	Other Receivables	
Other Assets		
21	FF&E	
22	Other Assets	
Total Assets		0

EXHIBIT B-2

For Period Ending
09/30/21

Line

1	Secured Claims	0
2	APF Loan	0
3	Special Deposit Claims	0
Administrative Claims - Class 1		
4	Administrative Claims - State/Receiver	
	Special Deputy Receiver, Subcontractors Fees & Expenses	
	Liquidation Oversight	
	Special Master's Fees	
5	Administrative Claims - Guaranty Assns	
	Administrative Expense Paid	
	Administrative Expense Reserves	
6	LAE - Guaranty Assns	
	LAE Paid	
	LAE Reserves	
Policy Claims - Class 2		
7	Loss Claims - Guaranty Assns	
	Loss Claims Paid	
	Loss Claims Reserves	
8	Loss Claims - Other	
	Other Loss Claims Paid	
	Other Loss Claims Reserves	
9	LAE - Other	
10	Unearned & Advance Premium Claims - GA	
11	Unearned & Advance Premium Claims - Other	
Other Liabilities		
12	Class 3 Claims	
13	Class 4 Claims	
14	Class 5 General Unsecured Creditor Claims	
15	Class 5 Reinsurance Related Unsecured Claims	
16	Class 6 Claims	
17	Class 7 Claims	
18	Class 8 Claims	
19	Class 9 Claims	
20	Class 10 Interest	
21	Class 11 Claims	
22	Other Liabilities	
	Total Liabilities	0
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over	0
	Total Liabilities & Equity	0

EXHIBIT C

R-554	Santa Fe Auto Insurance Company	EXHIBIT C
	Sources & Uses of Cash	
	From Inception to September 30, 2021	
Income		
	Premium Receipts	2,444,077
	Agents' Balances Received	
	Reinsurance Recoveries	11,307,959
	Salvage & Subrogation Recoveries	126,799
	Affiliates Recovery	
	Settlement/Litigation Recovery	550,000
	Other Receipts	304,485
	Sale of Real & Personal Property	714,274
	Investment Sales/Receipts	
	Other Asset Receipts	2,547,553
	Total Receipts from Assets/Receivables	17,995,147
	Interest & Dividend Receipts, EA Interest	18,565
	Cash Deposit Interest	273,705
	Total Cash Receipts	18,287,417
Disbursements		
	SDR Fees & Expenses	1,639,046
	Subcontractor Legal Fees & Expenses	1,108,639
	Subcontractor Other Fees & Expenses	1,861,232
	Non-Subcontractor Fees & Expenses	2,996,254
	Other Expenses	888,647
	RLO Fees & Expenses	379,207
	Total Disbursements for Operations	8,873,025
	Loss Claims & LAE Expense Payments	1,556,579
	Early Access Payments - GA	10,695,129
	Final Distributions	4,656,722
	Total Cash Distributions	16,908,430
	Total Cash Disbursements & Distributions	25,781,455
	APF Loan Proceeds (Repayment)	
	Net Increase(Decrease) in Cash	(7,494,038)
	Cash at Receivership Date-Beginning of Period	7,494,038
	Cash at End of Period	(0)

EXHIBIT D

SANTA FE AUTO INSURANCE R554
UNCLAIMED DISTRIBUTIONS AND FUNDS TO BE REMITTED TO THE COMMISSIONER
EXHIBIT D

Claimant	POC	Amount Allowed	Gross Distribution	Previous Distributions	De Minimis Amt To Residual Claims	Unclaimed Distributions
Class 1 Claims			at 100%			
	516	52.14	52.14	0 00		52.14
Class 2 Claims						
	14	1.67	0.62	0 00	0.62	0.00
	36	8.54	3.19	0 00	3.19	0.00
	45	4.77	1.78	0 00	1.78	0.00
	121	6.95	2.59	0 00	2.59	0.00
	264	36.13	13.49	0 00	13.49	0.00
	285	1.20	0.45	0 00	0.45	0.00
	320	1.00	0.37	0 00	0.37	0.00
	379	1.47	0.55	0 00	0.55	0.00
	470	49.12	18.34	0 00	18.34	0.00
	937	36.40	13.54	0 00	13.54	0.00
	945	5,085.00	1,898.48	0 00		1,898.48
Total Class 2 Claims		5,232.25	1,953.41	0 00	54.92	1,898.48
Total Class 1 Through Class 2 Claims		5,284.39	2,005.55	0 00	54.92	1,950.62
Amount to Distribute to Texas Department of Insurance - Residual Claims						54.92
Interest Income Earned from September 1, 2020 through Augst 31, 2021-Texas Treasury Account (net of bank charges)						339.98
Total Funds Remitted to Commissioner						2,345.53

EXHIBIT E

ASSIGNMENT

This Assignment is made by CANTILO & BENNETT, L.L.P., solely in its capacity as Special Deputy Receiver of Santa Fe Auto Insurance Company (the “SDR” and “Santa Fe” respectively), to the Commissioner of Insurance for the State of the Texas (hereinafter the “Commissioner”).

Whereas Santa Fe was placed into permanent receivership on March 8, 2013, and CANTILO & BENNETT, L.L.P., was appointed as SDR;

Whereas, the SDR does not believe it is in the best interests of the receivership estate of Santa Fe to continue the proceeding to attempt to collect any potential remaining assets;

Whereas, the Court has approved the SDR’s *Final Report and Application to Make Final Distribution and Destroy Records* (the “Final Report”), and pursuant to such order the SDR has distributed the remaining cash assets of the receivership estate of Santa Fe;

Whereas, the Court has approved the SDR’s *Final Accounting and Application to Terminate Receivership and Discharge Receiver and Special Deputy Receiver*, which authorized and directed the SDR to assign all non-cash assets to the Commissioner;

Therefore, for value received, the sufficiency of which is acknowledged, the SDR conveys to the Commissioner all right, title and interest in any and all assets of Santa Fe, cash or non-cash, whether known or unknown, and any assets that have been written off by Santa Fe or the SDR. Such right, title and interest shall include any and all claims, potential claims, suits, demands, causes of action, charges or grievances of any kind or character, regardless of the nature or extent, whether arising in tort, contract, by statute or otherwise, and include claims for breach of fiduciary duty, constructive fraud and fraud. The unknown assets assigned include those that may exist now or that may arise in the future. It is the intent of the Parties to this Assignment to convey to the Commissioner all legal and equitable rights held by the receivership estate of Santa Fe, whether or not specifically identified herein.

This Assignment constitutes the entire agreement of the parties, and the Parties expressly agree that its terms supersede any other agreements or understandings with respect to the subject matter of this Assignment. This Assignment shall not waive, release or otherwise affect any liabilities or obligations of any party to Santa Fe.

The laws of the State of Texas govern this Assignment, and venue and jurisdiction for any action to enforce this Assignment shall be in Travis County, Texas.

CANTILO & BENNETT, L.L.P., Special Deputy Receiver of Santa Fe Insurance Company

By: _____
Susan E. Salch, designated representative of CANTILO & BENNETT, L.L.P.

EXHIBIT F

**SANTA FE AUTO INSURANCE R554
FINAL DISTRIBUTION SCHEDULE
EXHIBIT 6**

Claimant	POC	Amount Allowed	Gross Distribution	Previous Distributions	De Minimis Amt To Residual Claims	Proposed Distribution
Class 1 Claims						
Arkansas Property & Casualty Guaranty Fund		122,968.39	at 100%			
Arizona Insurance Guaranty Fund Money Market Account		565,464.54	122,968.39	122,968.39		0.00
Georgia Insurers Insolvency Pool		745,164.31	524,705.80	524,705.80		40,758.74
The New Mexico Property & Casualty Insurance Guaranty Association		205,470.51	745,164.31	548,249.81		196,914.50
Nevada Insurance Guaranty Association		422,060.00	205,470.51	205,470.51		0.00
Oklahoma Property & Casualty Insurance Guaranty Association General Account		993,701.13	422,060.00	422,060.00		0.00
Texas Property and Casualty Insurance Guaranty Association Administrative Account		8,132,340.12	993,701.13	993,701.13		0.00
Utah Property and Casualty Insurance Guaranty Association		50,116.54	8,132,340.12	6,792,731.89		1,339,608.23
Baker & Hostetler LLP	41	5,750.00	50,116.54	50,116.54		0.00
Laser Law Firm, P. A.	148	148.50	5,750.00	0.00		5,750.00
Bell and Young, Ltd.	516	52.14	148.50	0.00		148.50
Simmons Jannace, LLP	581	2,295.15	52.14	0.00		52.14
Low & Cohen, PLLC	609	3,533.45	2,295.15	0.00		2,295.15
Deutsch Kerrigan & Stiles, LLP	618	1,383.09	3,533.45	0.00		3,533.45
Madison & Mroz, P. A.	715	151.00	1,383.09	0.00		1,383.09
Madison & Mroz, P. A.	717	65.64	151.00	0.00		151.00
Madison & Mroz, P. A.	722	87.38	65.64	0.00		65.64
Madison & Mroz, P. A.	724	150.00	87.38	0.00		87.38
Madison & Mroz, P. A.	727	64.86	150.00	0.00		150.00
Madison & Mroz, P. A.	728	150.00	64.86	0.00		64.86
Madison & Mroz, P. A.	729	51.36	150.00	0.00		150.00
Madison & Mroz, P. A.	730	173.52	51.36	0.00		51.36
Madison & Mroz P. A.	734	82.66	173.52	0.00		173.52
Madison & Mroz, P. A.	735	97.94	82.66	0.00		82.66
Rogers, Mastrangelo, Carvalho & Mitchell	1145	2,408.11	97.94	0.00		97.94
			2,408.11	0.00		2,408.11
Total Class 1 Claims		11,253,930.34	11,253,930.34	9,660,004.07	0.00	1,593,926.27
Class 2 Claims						
Arkansas Property & Casualty Guaranty Fund		219,554.31	37.33%			
Arizona Insurance Guaranty Fund Money Market Account		584,483.82	81,970.58	16,576.48		65,394.10
Georgia Insurers Insolvency Pool		366,060.36	218,216.98	0.00		218,216.98
The New Mexico Property & Casualty Insurance Guaranty Association		399,897.28	136,668.60	0.00		136,668.60
Nevada Insurance Guaranty Association		1,985,270.72	149,301.61	19,508.24		129,793.37
Oklahoma Property & Casualty Insurance Guaranty Association General Account		1,462,830.88	741,200.84	701,704.86		39,495.78
Texas Property and Casualty Insurance Guaranty Association Administrative Account		5,780,935.74	546,147.78	260,650.10		285,497.68
Utah Property and Casualty Insurance Guaranty Association		103,413.55	2,158,311.84	0.00		2,158,311.84
Individual	14	1.67	38,609.44	35,521.91	0.62	3,087.53
Individual	36	8.54	0.62	0.00	0.62	0.00
			3.19	0.00	3.19	0.00

SANTA FE AUTO INSURANCE R554
FINAL DISTRIBUTION SCHEDULE
EXHIBIT 6

Claimant	POC	Amount Allowed	Gross Distribution	Previous Distributions	De Minimis Amt To Residual Claims	Proposed Distribution
Individual	45	4.77	1.78	0.00	1.78	0.00
Individual	121	6.95	2.59	0.00	2.59	0.00
Individual	245	5,832.00	2,177.38	0.00		2,177.38
Individual	264	36.13	13.49	0.00	13.49	0.00
Individual	285	1.20	0.45	0.00	0.45	0.00
Individual	320	1.00	0.37	0.00	0.37	0.00
Individual	379	1.47	0.55	0.00	0.55	0.00
Individual	470	49.12	18.34	0.00	18.34	0.00
Open Road RAC, LLC.	527	1,000.00	373.35	0.00		373.35
Individual	536	8,500.00	3,173.47	0.00		3,173.47
Individual	537	16,500.00	6,160.27	0.00		6,160.27
Individual	547	1,945.00	726.17	0.00		726.17
Individual	641	5,200.00	1,941.42	0.00		1,941.42
Individual	743	25,000.00	9,333.75	0.00		9,333.75
Individual	937	36.40	13.54	0.00	13.54	0.00
Individual	945	5,085.00	1,898.48	0.00		1,898.48
San Antonio VAMC	1131	1,314.10	490.62	0.00		490.62
		10,972,970.01	4,096,757.32	1,033,961.59	54.93	3,062,740.80
<i>Total Class 2 Claims</i>						
<i>Total Class 1 Through Class 2 Claims</i>		22,226,900.35	15,350,687.66	10,693,965.66	54.93	4,656,667.07
Amount to Distribute to Texas Department of Insurance - Residual Claims						54.93
<i>Total Distributions</i>						4,656,722.00

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Christopher Fuller on behalf of Christopher Fuller
Bar No. 07515500
cfuller@fullerlaw.org
Envelope ID: 59112508
Status as of 11/17/2021 5:33 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
William Clark	4302200	wsc1964@yahoo.com	11/12/2021 11:58:46 AM	SENT
Rachel Obaldo	24041617	Rachel.Obaldo@oag.texas.gov	11/12/2021 11:58:46 AM	SENT

Associated Case Party: STATE OF TEXAS OFFICE OF THE ATTORNEY GENERAL

Name	BarNumber	Email	TimestampSubmitted	Status
Cynthia Ann Morales	14417420	Cynthia.Morales@oag.texas.gov	11/12/2021 11:58:46 AM	SENT