NO. D-1-GV-12-001713

STATE OF TEXAS	§	IN THE DISTRICT COURT OF
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
GRAMERCY INSURANCE COMPANY	8	53RD JUDICIAL DISTRICT

FINAL REPORT OF CLAIMS AND APPLICATION TO MAKE FINAL DISTRIBUTION AND DESTROY RECORDS

COMES NOW, Resolution Oversight Corporation, Special Deputy Receiver of Gramercy Insurance Company (SDR and Gramercy, respectively) and files this *Final Report of Claims and Application to Make Final Distribution and Destroy Records* (Application), and in support respectfully shows the Court as follows:

I. INTRODUCTION

1.1 The SDR has completed all claims processing and asset collection activities in this proceeding. The SDR submits its final report and requests this Court to authorize it to make a final distribution of Gramercy's assets and dispose of or transfer any remaining records of Gramercy. Following the completion of the final distribution, the SDR will submit a Final Accounting Application to dissolve the charter of Gramercy, discharge the Receiver and the SDR, and terminate this proceeding.

II. AUTHORITY

- 2.1 The SDR is authorized to file this Application pursuant to Tex. Ins. Code §\$443.258, 443.302 and 443.354. Under Tex. Ins. Code § 443.154(a), the SDR has all of the Receiver's powers, except as limited by the Receiver.
- 2.2 The Court entered its *Order of Reference to Master* on December 14, 2012 (Order of Reference). The subject matter of this Application is referred to the Master pursuant to the

Order of Reference. The Master has authority to request and accept evidence pursuant to Tex. R. Civ. P. 171.

III. BACKGROUND

Company History

3.1 Gramercy was organized in 1979 as a property and casualty company under Chapter 822 of the Texas Insurance Code. It wrote private passenger auto liability insurance, commercial automobile liability insurance and physical damage insurance. Gramercy was licensed in 37 states: Alabama, Arizona, Arkansas, Colorado, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, North Carolina, North Dakota, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin and Wyoming.

Initiation of Receivership Proceeding

3.2 On December 4, 2012, this court entered an *Agreed Order Appointing Rehabilitator* and *Permanent Injunction*.

Appointment of Receivers

3.3 In accordance with Tex. Ins. Code § 443.101, Eleanor Kitzman, the Commissioner of Insurance (Commissioner), was appointed Receiver on December 4, 2012. Eleanor Kitzman was succeeded by Julia Rathgeber, David Mattax, Kent Sullivan, and Cassie Brown. Eleanor Kitzman, Julia Rathgeber, David Mattax and Kent Sullivan have been discharged as Receiver. Insurance Commissioner Cassie Brown is the current Receiver.

¹ "Receiver" refers to the Rehabilitator or Liquidator, as applicable.

Appointment of Special Deputy Receiver

3.4 On December 5, 2012, Resolution Oversight Corporation was appointed as Interim Special Deputy Receiver of Gramercy. On February 15, 2013, Resolution Oversight Corporation was appointed as Special Deputy Receiver of Gramercy.

Referral to Master

3.5 On December 14, 2012, this Court signed its *Order of Reference to Master* appointing Tom Collins as Special Master in this proceeding.

Liquidation

3.6 On August 26, 2013, the Court entered its *Order Appointing Liquidator and Permanent Injunction* (Liquidation Order).

<u>Impairment</u>

3.7 On August 27, 2013, the Commissioner entered an order designating Gramercy as an impaired insurer effective August 26, 2013. In accordance with Tex. Ins. Code Chapter 462, the Texas Property and Casualty Insurance Guaranty Association (TPCIGA) became obligated to pay "covered claims" of Gramercy, and guaranty associations in 36 other states in which the company was licensed became obligated to pay claims in accordance with their governing statutes. Unless otherwise indicated, TPCIGA and the other state guaranty associations are collectively referred to as the "Guaranty Associations."

IV. FINANCIAL STATEMENTS

4.1 The Balance Sheet for the receivership attached as Exhibit 1, incorporated herein by reference, reflects the financial condition of the receivership as of January 31, 2022. The consolidated Sources and Uses of Cash Statement, which lists all funds received and disbursed from the date of receivership to January 31, 2022, is attached as Exhibit 2 and incorporated herein

by reference. These Exhibits represent the final financial reports for the receivership in accordance with Tex. Ins. Code § 443.016.

V. ASSETS

Disposition of Assets

5.1 A Disposition of Assets schedule is attached as Exhibit 3 and incorporated herein by reference. The schedule sets forth all asset transactions since August 26, 2013, and reflects total assets of Gramercy as of January 31, 2022.

VI. CLAIMS

Notice

6.1 On February 21, 2014, this court entered its Order establishing a claim filing deadline. In accordance with this Order, the SDR provided notice of the claim filing deadline to all persons who may have had claims as shown by Gramercy's books and records. As set forth in this Order, the SDR published notice of the claims filing deadline in newspapers of general circulation in the following cities: Birmingham, Alabama; the Ft. Lauderdale/Miami area, Jacksonville, Orlando and Tampa, Florida; Atlanta, Georgia; Chicago, Illinois; Baton Rouge and New Orleans, Louisiana; the Minneapolis/St. Paul, Minnesota area; Jackson, Mississippi; Allentown, Bethlehem and Philadelphia, Pennsylvania; and Dallas, El Paso, Houston, Harlingen, Laredo and McAllen, Texas.

Filing of Claims

- 6.2 There were 712 proofs of claim (POCs) filed as follows:
 - (a) 34 Class 1 & 2 Guaranty Association claims;
 - (b) 4 Class 1 allowed claims;
 - (c) 3 Class 1 & 5 allowed claims;
 - (d) 1 Class 1 & 5 partially-allowed and classified claim;
 - (e) 23 Class 2 allowed non-Guaranty Association claims;
 - (f) 1 Class 5 allowed claim;

- (g) 1 Class 5 & 10 partially-allowed and classified claim;
- (h) 480 Class 5 or lower priority classified claims;
- (i) 112 Disallowed claims;
- (j) 51 Guaranty Association fully covered claims;
- (k) 1 Withdrawn claim;
- (l) 1 Duplicate claim

Claims Processing

- 6.3 All claims representing "covered claims" were referred to Guaranty Associations pursuant to Tex. Ins. Code § 443.253(m). All POCs against the receivership estate were determined pursuant to Tex. Ins. Code § 443.253(b). Accordingly, all POCs were classified and if appropriate, allowed for an amount certain, or disallowed. The period of time allowed by Tex. Ins. Code § 443.253(c) to appeal the SDR's determinations on these claims has expired, and the SDR's determination on these claims is final and not subject to review. The POCs were processed as follows:
 - (a-1) The Guaranty Associations' Class 1 claims were allowed in the amount of \$10,771,694.19.
 - (a-2) The Guaranty Associations' Class 2 claims were allowed in the amount of \$17,756,581.57.
 - (b) Other Class 1 non-guaranty association claims were allowed in the amount of \$2,302.82.
 - (c) Claims with a combination of allowed Class 1 and allowed Class 5 components were allowed in the amount of \$21,922.66 for Class 1 and \$33,383.50 for Class 5.
 - (d) One POC had a combination of secured and a Class 5 claims. The SDR determined that \$119,731.58 was secured by, and allowed to be paid from, trust funds on deposit at BNY Mellon Bank.
 - (e) The Class 2 claims filed by claimants under policies that were not payable by the Guaranty Associations were allowed in the amount of \$2,312,354.64.
 - (f) A Class 5 general creditor claim was allowed in the amount of \$4,274,600.09.
 - (g) A claim with a combination of allowed Class 5 and classified Class 10 components was allowed in the amount of \$1,640,730.54 for Class 5.
 - (h) All other claims were either classified as Class 5 or lower, disallowed, were fully covered by Guaranty Associations, withdrawn, or deemed a duplicate.

In summary, Class 1, Class 2 and Class 5 claims were allowed for a total of \$10,915,651.25, \$20,068,936.21, and \$5,948,714.13, respectively.

- 6.4 In accordance with Tex. Ins. Code § 443.253(k), the SDR processed claims in Classes below Class 2 with respect to their priority and did not make a determination of the value of the claim except as noted in 6.3 (c), (f) and (g). Claimants with claims below Class 2 were notified in their determination letters that the SDR would take no further action on their claim unless funds became available for distribution to their class.
- on behalf of Gramercy entered into a conditional Release Agreement whereby the United States will release and discharge the SDR, the current and previous Receivers, and the Gramercy estate from any and all liability under 31 U.S.C. § 3713(b) in connection with the liquidation of the estate. The release is conditioned upon the payment of the *pro rata distribution to the* Department of Labor on its allowed Class 2 claim. The Release Agreement reserves certain criminal, civil and administrative claims arising pursuant to certain federal laws and regulations including, but not limited to, the Internal Revenue Code, False Claims Act, Program Frauds Civil Remedies Act, Employee Retirement Income Security Program and Medicare as Secondary Payer statute. A copy of the Release Agreement (without its exhibits) is attached hereto as Exhibit 4 and is incorporated herein by reference.

Claims Report

6.6 Pursuant to Tex. Ins. Code § 443.258, the SDR submitted its First Report of Claims, which was approved by this Court on December 21, 2015. The SDR submitted its Second Report of Claims, which was approved by this Court on October 19, 2017. The SDR submits its final report of claims, which is attached as Exhibit 5, and incorporated herein by reference. Exhibit 5

identifies the claimant and/or the POC number, the classification of the POC, and the amount allowed, or other action taken on the POC.² The are no remaining objections to the SDR's determinations; therefore, the determinations are now final pursuant to Tex. Ins. Code §443.253(c). The SDR submits Exhibit 5 as its Final Report of Claims and requests the court approve its actions on these claims pursuant to Tex. Ins. Code § 443.258.

Distributions

6.7. A total of \$12,759,718.24 in early access payments were distributed to 29 Guaranty Associations for Class 1 and 2 covered claims obligations.

VII. EXPENSES

Paid Expenses

7.1 The administrative expenses of the Receiver and SDR have been paid through January 31, 2022. On July 3, 2013, this Court approved the terms of compensation of the SDR and other contractors pursuant to Tex. Ins. Code § 443.015. On November 14, 2016, a supplemental application was approved. The compensation and expenses have been paid in accordance with those orders.

Closing Expenses

7.2 The SDR proposes to reserve \$123,500 for the payment of estimated expenses involved in closing the receivership, as reflected on the detailed breakdown of estimated closing expenses, attached as Exhibit 6.

Final Statement of Expenses

7.3 Pursuant to Tex. Ins. Code § 443.015, the SDR will submit a detailed final statement of the actual expenses incurred when the SDR files the final accounting and application

² Claims filed by individuals are identified only by POC number to reduce the disclosure of certain personal information.

to terminate the estate. If the actual expenses differ from the amount reserved, the excess funds or the shortfall (as applicable) will be handled as described in Paragraphs 8.5,8.6 or 8.7.

VIII. DISTRIBUTION OF ASSETS

Assets Available for Distribution

8.1 As of January 31, 2022, there was \$4,925,714.67 in cash in the receivership estate's accounts. After reserving for the remaining administrative expenses through closing as described above and accounts payable of \$11,016.08 on January 31, 2022, \$4,791,198.59 will be available for distribution.

Eligible Claimants

8.2 There are sufficient assets to pay allowed Class 1 claims in full. There are sufficient assets to make a 31.627% pro rata distribution on allowed Class 2 claims. Attached as Exhibit 7 is a Distribution Schedule listing all allowed claimants to whom distributions will be made. This exhibit identifies each claimant's name as shown on the POC (except those individuals will be referred to as "Individual Claimant"), the amount allowed by the SDR, and the proposed distribution. The proposed distribution is an approximate figure based on current financial data, and the actual distribution may vary from this projection.

Distribution Process

8.3 As allowed by Paragraph 7.5 of the Liquidation Order, the SDR has communicated with claimants using email. Recently, the SDR contacted all claimants getting distributions to obtain completed Form W-9's, wire transfer instructions and any updated address information for those claimants receiving paper checks. A few claimants did not provide the SDR with the requested W-9s and payment instructions. The SDR will email the Distribution Notice, attached as Exhibit 8 (Distribution Notice), to all claimants who are receiving distributions to advise them

of the pending distributions. For those claimants, who did not respond to the SDR's attempts to collect W-9s and payment instructions, the SDR will send the Distribution Notice to the address provided by the claimant in the POC, or any subsequent address and any email address provided by the claimant since the POC was filed.³ In the event that a Distribution Notice is returned with an address correction, the SDR will send the Distribution Notice to the corrected address. If the Special Deputy Receiver cannot confirm delivery of the Distribution Notice or the claimant does not provide a completed W-9, the SDR will handle the distribution to that claimant as set forth in Paragraph 9.2.

Distributions on *De Minimis* Claims

8.4 Tex. Ins. Code § 443.253(h) provides for the disallowance of claims for *de minimis* amounts, as determined by this Court. The SDR proposes to establish a distribution threshold of \$25.00, which is reasonable and necessary for administrative convenience. The SDR requests that this Court find that any distribution under the proposed threshold be considered *de minimis* and handled as set forth in Paragraph 8.7. Any such amounts that are withheld will be treated as general assets of the receivership estate.

Residual Funds

8.5 It is possible that there may be additional funds in the receivership account after the distribution (Residual Funds). Such funds may result from interest on the receivership account, excess reserves for closing expenses, or the collection of assets after the distribution has commenced. Such funds will be handled as described in Paragraph 8.6.

³ The Order Granting Application to Approve Notice and Set Claims Filing Deadline approved the claim form, which required all claimants to provide a current mailing address on the proof of claim, and provide any changes of address to the SDR.

Supplemental Distribution

8.6 If it is economically feasible to distribute Residual Funds, the SDR will make a supplemental pro-rata distribution from any such residual funds, after reserving for distribution expenses. Any supplemental distribution will be subject to the *de minimis* distribution threshold approved by the Court.

Transfer of Remaining Funds

8.7 Tex. Ins. Code § 443.352 provides that this Court may issue an order to provide for the transfer of funds remaining after the final distribution that cannot be economically distributed. The SDR requests that any such funds be transferred to the Commissioner for deposit in an account established under Tex. Ins. Code § 443.304(c). Such funds will be available to pay any expenses exceeding the expense reserve or expenses incurred for activities after the closing of the receivership, such as responding to inquiries and handling unclaimed funds.

IX. UNCLAIMED FUNDS

Unclaimed Distributions

- 9.1 The SDR will maintain the receivership's distribution account for the earlier of thirty (30) days after the final distribution is sent or until all distributions have cleared the account. This will provide a reasonable amount of time for claimants to receive and deposit their checks. The SDR will deliver any funds which are unclaimed as of the closing of the account to the Commissioner as required by Tex. Ins. Code § 443.304(a) to be placed in a segregated unclaimed funds account.
- 9.2 As discussed in paragraph 8.3 above, the SDR did not receive a response from some claimants regarding W-9 and payment instructions. In the event that a Distribution Notice is mailed and emailed to an address and returned as undeliverable, the SDR requests that this Court

order that any distribution due any such claimant be treated as unclaimed without the need for the estate to incur the expense of mailing an undeliverable check. The SDR proposes that all distributions to such claimants be delivered to the Commissioner upon closing of its account as described in paragraph 9.1 of this Application.

X. ASSIGNMENTS AND TRANSFERS

Assignment of Non-Cash Assets

- 10.1 Tex. Ins. Code § 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. Further, Tex. Ins. Code § 443.352 permits the Court to enter any orders necessary to address unliquidated assets in connection with an application to terminate a receivership proceeding. The SDR proposes to transfer to the Commissioner any and all non-cash assets of Gramercy, including, but not limited to, assets and rights not known at the time of the termination of this proceeding.
- 10.2 The SDR also proposes to transfer to the Commissioner Gramercy's interest in a proof of claim filed in the High Court of New Zealand Auckland Register CIV-2018-404-000306 in the liquidation of CBL Insurance Ltd. f/k/a Contractor's Bonding, Ltd. A copy of the proposed assignment is attached as Exhibit 9.

Liquidation and Disposition of Assigned Assets

10.3 In the event that any assigned assets are collected and liquidated, and such amount is sufficient to justify a distribution, this proceeding may be reopened under Tex. Ins. Code §443.353. If such amount cannot be distributed economically, the SDR requests that any such funds be treated as unclaimed funds and deposited in accordance with Tex. Ins. Code § 443.304(c).

XI. RECORDS

Disposal of Records

11.1 On September 14, 2015, and May 3, 2016, this Court entered orders permitting the SDR to destroy certain records of Gramercy which were no longer required for the administration of this receivership. The SDR has identified additional records that will not be needed after the termination of this proceeding. These records are listed in the attached Exhibit 10. The SDR requests authority to dispose of such records in accordance with Tex. Ins. Code § 443.354(a). The SDR also requests permission to destroy all backup and or duplicate electronic records created by subcontractors.

Records Transferred to Guaranty Associations

11.2 The SDR transferred all records requested by any Guaranty Association and it does not anticipate any further requests for records by a Guaranty Association. The SDR requests that this Court authorize the Guaranty Associations to retain or dispose of such records at their discretion.

Records Transferred to Commissioner

11.3 Records that may be required after the termination of this proceeding that are not transferred to the Guaranty Associations will be scanned and delivered to the Commissioner pursuant to Tex. Ins. Code § 443.354(b). The SDR requests that the Court authorize the Commissioner to retain or dispose of these records at his or her discretion.

XII. TAX RETURNS

12.1 The SDR has filed income tax returns with the Internal Revenue Service for years 2012 through 2020. The SDR will file the 2021 tax return and 2022 final tax return for Gramercy

after the distribution of assets and before the SDR is discharged. No taxes are owed to the Internal Revenue Service.

XIII. CERTIFICATION OF CLOSING ACTIVITIES

13.1 Before or when the SDR files an application to terminate the estate and be discharged, the SDR will file a certification with the Special Master that confirms the final tax return has been filed and confirmation from the federal government that the contingency for the release from the federal government has been satisfied, together with the final accounting of all funds in the estate.

XIV. CHARTER AND LICENSES

14.1 The SDR has determined that a sale of the charter and licenses of Gramercy is not feasible. The SDR will request that this Court dissolve the charter pursuant to Tex. Ins. Code §443.153(e) on the termination of this proceeding.

XV. OFFER OF PROOF

15.1 The Application is verified by the Affidavit of Ernesto Garza pursuant to Tex. Ins. Code § 443.017(b), solely in his capacity as President of Resolution Oversight Corporation, as SDR of Gramercy. The Affidavit is attached hereto as Exhibit 11.

XVI. NOTICE

Notice of Application

16.1 In accordance with Tex. Ins. Code § 443.007(d) and the *Order of Reference*, the SDR served this Application at least 14 days before the submission date of this Application on (i) parties that filed an appearance in this proceeding and (ii) other parties as determined by the SDR as shown on the Certificate of Service.

Distribution Notices

16.2 As discussed in paragraph 8.3, all claimants receiving a distribution will be sent or emailed a copy of the Distribution Notice, attached as Exhibit 8. These notices will be sent at least 14 days before the submission date of the Application.

PRAYER

WHEREFORE, the SDR respectfully prays that this Court enter an Order:

- 1. Accepting the final financial statements;
- 2. Approving in all respects the Application to Make Final Distribution;
- 3. Approving the SDR's Final Report of Claims:
- 4. Approving the estimated expenses through the closing of the receivership pursuant to Tex. Ins. Code § 443.015;
- 5. Authorizing the SDR to distribute the cash assets of the receivership as described in the Application and authorizing any distribution under \$25.00 to be withheld as *de minimis*;
- 6. Authorizing the SDR to transfer to the Commissioner any Residual Funds remaining after all distributions are made;
- 7. Authorizing the SDR to deliver all unclaimed funds to the Commissioner, and finding that any distribution to a claimant, for whom the Distribution Notice was returned as undeliverable, shall be deemed as unclaimed for purposes of Tex. Ins. Code § 443.304;
- 8. Authorizing the assignment of unknown, unliquidated and the known, non-cash assets to the Commissioner;
- 9. Authorizing the Guaranty Associations to retain or dispose of any claim records at their discretion;

- 10. Authorizing the SDR to dispose of the records listed in Exhibit 10 as well as any electronic backup copies made by subcontractors, deliver any remaining records that are not transferred to Guaranty Associations to the Commissioner, and authorizing the Commissioner to maintain or dispose of such records at his or her discretion; and
 - 11. Granting such further relief to which the SDR or Receiver may be entitled.

Respectfully submitted,

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By: /s/ Rachel J. Stroud

Rachel J. Stroud State Bar No. 19424700

Attorneys for the Special Deputy Receiver

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all interested parties in accordance with the Texas Rules of Civil Procedure and Tex. Ins. Code § 443.007(d) this 28th day of March 2022.

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Mr. Jeffry J. Cahill, Managing Secretary North Dakota Insurance Guaranty Association P.O. Box 2634 Bismarck, ND 58502-2634 Email: jsc46@bis.midco.net

Ms. Amanda Barbera, Executive Director Ms, Jesica Cannon, Accounting Administrator OK Property & Casualty Ins. Guaranty Assoc. 2601 Northwest Expressway, Suite 800E Oklahoma City, OK 73112 Email: a.barbera@opciga.org Email: jcannon@opciga.org

Mr. Cathy Braughton-Bazant, Administrator Oregon Insurance Guaranty Association 10700 SW Beaverton Hilsdale Hwy, Suite 426 Beaverton, OR 97005

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Chief of Special Procedures Staff U.S. Internal Revenue Service 1111 Constitution Avenue, N.W. Washington, D.C. 20224 *Via Certified Mail/RRR*

/s/ Rachel J. Stroud

Rachel J. Stroud

Email: rstroud@thestroudfirm.com

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 BALANCE SHEET JANUARY 31, 2022

Assets		
Cash- Unrestricted		\$4,925,715
Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)		583,502
Other Receivables/ Receivable from Guaranty Associations- Early Access Payments		12,759,718
Other Assets/ Deferred tax asset (net of valuation allowance)		0
Total Assets		\$18,268,935
Liabilities & Equity Liabilities Administrative Claims- Class 1 Administrative Claims- State/Receiver Special Deputy Receiver, Subcontractor Fees & Expenses	\$10,225	
Liquidation Oversight Special Master's Fees	652 139	
Administrative Claims- Guaranty Associations Administrative Expenses Paid LAE- Guaranty Associations	3,880,583	
LAE Paid	6,922,650	-
Total Class 1 Claims		\$10,814,249
Policy Claims- Class 2 Loss Claims- Guaranty Associations Loss Claims Paid Other Loss Claims Paid Unearned & Advance Premium Claims- Guaranty Associations Unearned & Advance Premium Claims- Other Total Class 2 Claims	17,738,743 731,217 120,693 1,581,138	- 20,171,791
Other Liabilities Class 5 General Unsecured Creditor Claims Class 5 Reinsurance Related Unsecured Claims Class 6 Claims Class 9 Claims Class 11 Claims Total Other Liabilities	5,061,882 4,156,082 105,108 3,150,000 6,553,665	19,026,737
Total Liabilities		50,012,777
Equity (Deficit)		(31,743,842)
Total Liabilities & Equity		\$18,268,935

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 SOURCES & USES OF CASH STATEMENT INCEPTION TO DATE THROUGH JANUARY 31, 2022

Receipts Receipts from Assets/Receivables Premium Receipts Agents Balance Receipts Reinsurance Recoveries Subrogation Recoveries Settlement/Litigation Recoveries Other Receivable Receipts Sale of Real & Personal Property Investment Sales/Receipts Other Asset Receipts Total Receipts from Assets/Receivables	\$1,835,941 19,268 7,023 81,621 3,465,540 418,296 7,773 4,792,733 57,487	\$10,685,682
		φ10,000,002
Passive Receipts Interest & Dividend Receipts Cash Deposit Interest Total Passive Receipts	216,766 278,962	495,728
Total Cash Receipts		11,181,410
Disbursements for Operations SDR Fees & Expenses Subcontractor Legal Fees & Expenses Subcontractor Other Fees & Expenses Other Expenses RLO Fees & Expenses Total Disbursements for Operations Net Cash from Operations	(1,976,275) (1,742,407) (1,276,492) (387,576) (358,615)	(5,741,365)_ 5,440,045
Cash Distributions Guaranty Associations Other Distributions De Minimis Funds Returned to Commissioner Total Cash Distributions	(12,759,718) (301,184) 0	. (13,060,902)
Net Decrease in Cash		(7,620,857)
Cash at Beginning of Period		12,546,572
Cash at End of Period		\$4,925,715

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 DISPOSITION OF ASSETS SCHEDULE INCEPTION TO DATE THROUGH JANUARY 31, 2022

ASSET DESCRIPTION	ASSET BALANCE at 8/26/13	NEW ASSETS	ASSET RECOVERY	AMT OF WRITE OFF	REASON FOR WRITE OFF	ASSET BALANCE at 1/31/22
CASH						
Cash	12,720,256	(470.004)				
accounts payable at 8/26/13		(173,684)				
net cash from operations distributions paid- guaranty associations		5,440,045 (12,759,718)				
distributions paid- other		(301,184)				
Subtotal	12,720,256	(7,794,541)	0	0		4,925,715
Cubicial	12,720,200	(1,101,011)	<u> </u>	, ,		1,020,710
INVESTMENTS						
Investments in Affiliated Entities	1			1	legal entity was dissolved	
Subtotal	1	0	0	1		0
DESTRUCTED ASSETS						
RESTRICTED ASSETS						
Statutory Deposits Florida	219,904	(4,904)	215,000			
Georgia	35,817	(4,904) (817)				
Louisiana	113,000	(617)	113,000			
Missouri	255,312	(4,837)				
North Carolina	327,863	(3,605)	•			
New Mexico	341,597	(6,597)				
Nevada	229,164	(4,164)				
Oregon	267,855	(7,855)				
South Carolina	507,925	(2,925)				
Texas	2,047,180	(37,180)	2,010,000			
Virginia	535,708	(15,708)	520,000			
Restricted- other						
Trust fund- Companion	12,848,197	74,389	1,365,000	11,557,586	per settlement agreement	
Trust fund- CBL	113,675	2,823	116,498			
Trust fund- AIG	119,713	19		-, -	transfer to AIG/ termination of trust	
Bond collateral	24,351			24,351	funds released to counties	
Subtotal	17,987,261	(11,361)	6,274,231	11,701,669		0

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 DISPOSITION OF ASSETS SCHEDULE INCEPTION TO DATE THROUGH JANUARY 31, 2022

ASSET DESCRIPTION	ASSET BALANCE at 8/26/13	NEW ASSETS	ASSET RECOVERY	AMT OF WRITE OFF	REASON FOR WRITE OFF	ASSET BALANCE at 1/31/22
REINSURANCE RECEIVABLES						
Reinsurance Recoverables on Paid Losses	36,093	(36,038)	55			
Reinsurance Recoverables on Unpaid Losses	50,194	879,171		345,863	per settlement agreement	
Other Reinsurance Recoveries	0	6,968	6,968			
Subtotal	86,287	850,101	7,023	345,863		583,502
OTHER RECEIVABLES						
Salvage & Subrogation Recoveries	0	81,621	81,621			
Premiums Due from Agents and Policyholders (net of allowance)	298,021	221,301	490,209		per commutation agreement uncollectable	
Receivable from Affiliates	145,175			145,175	write off receivable per cba 17-003	
Receivable from GA's- early access payments	0					
AL- cash distributions		221,204				
AR- cash distributions		10,858				
AZ- cash distributions		245,040				
CO- cash distributions		2,765				
FL- statutory deposit		215,794				
FL- cash distributions		2,465,662				
GA- statutory deposit		36,418				
GA- cash distributions		1,430,941				
IA- cash distributions		132,966				
ID- cash distributions		3,255				
IL- cash distributions		701,056				
IN- cash distributions		244,839				
KS- cash distributions		105,345				
KY- cash distributions		12,773				
LA- statutory deposit		113,014				
LA- cash distributions		70,646				
MN- cash distributions		62,948				
MO- statutory deposit		214,322				

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 DISPOSITION OF ASSETS SCHEDULE INCEPTION TO DATE THROUGH JANUARY 31, 2022

	ASSET					ASSET
	BALANCE	NEW	ASSET	AMT OF	REASON FOR	BALANCE
ASSET DESCRIPTION	at 8/26/13	ASSETS	RECOVERY	WRITE OFF	WRITE OFF	at 1/31/22
MS- cash distributions		690,638				
NC- statutory deposit		359,649				
NC- partial return of stat dep to GIC		(333,524)				
NM- statutory deposit		110,808				
NM- partial return of stat dep to GIC		(2,539)				
NV- statutory deposit		225,000				
OK- cash distributions		78,565				
OR- cash distributions		88,340				
PA- cash distributions		149,989				
SC- statutory deposit		505,000				
SD- cash distributions		6,262				
TN- cash distributions		546,360				
TX- cash distributions		3,932,681				
UT- cash distributions		241				
VA- cash distributions		10,052				
WA- cash distributions		102,350				
Other Receivables	0					
Litigation		3,360,042	3,349,042	11 000	per settlement agreement	
Other		418,296	418,296	11,000	per settlement agreement	
Outer		410,200	410,230			
Subtotal	443,196	16,840,978	4,339,168	185,288		12,759,718
OTHER ASSETS						
Furniture, Fixtures & Equipment	14,074		7,773	6,301	adjustment to market value	
Other Assets (net of allowance)	0	57,487	57,487			
Subtotal	14,074	57,487	65,260	6,301		0
TOTAL	31,251,075	9,942,664	10,685,682	12,239,122		18,268,935

RELEASE AGREEMENT

This Release Agreement is being entered into by the United States and Ernesto A. Garza, President of Resolution Oversight Corporation, the duly appointed Special Deputy Receiver ("Receiver") of Gramercy Insurance Company ("Gramercy").

I. PARTIES

The parties to this Release Agreement are the United States and the Receiver (collectively, the "Parties").

II. RECITALS

- 1. The Parties agree that the United States Department of Labor ("DOL") has a \$30,000 allowed Class 2 claim for injuries sustained by a United States Postal Service ("USPS") employee ("DOL Claim").
- 2. This Release Agreement is contingent upon payment by Gramercy of the DOL Claim. DOL shall be paid its pro rata share of the amount available to pay Class 2 claims. TX INS § 443.301. The Release Agreement will be effective only after the United States has received the full amount to which it is entitled as a Class 2 claimant.
- 3. The Parties do not intend this Release Agreement to release any possible claims the United States may have or may acquire against anyone for tax, fraud (including, but not limited to, securities and pension benefit fraud), criminal liabilities, or reimbursement liabilities and penalties arising under 42 U.S.C. § 1395y(b), or any liability under 31 U.S.C. § 3713(b) arising from such claims.
- 4. Except for the express terms of this Release Agreement, the Parties do not intend to create, enhance, diminish, defeat or otherwise affect such claims, if any, as the United States may have against the Receiver or the Gramercy estate.

- 5. The Parties understand that this Release Agreement may be subject to the approval of the 53rd Judicial District Court of Travis County, Texas ("Court"), which is supervising the liquidation of Gramercy.
- 6. The United States enters into this Release Agreement in reliance upon the information contained in the Affidavit dated June 14, 2019 executed by the Receiver of Gramercy, attached as Exhibit A to this Release Agreement ("Affidavit").

III. AGREEMENT

- 1. Gramercy will pay the DOL Claim its pro rata share of the funds available to pay Class 2 claims. This Release Agreement will be effective only upon DOL's receipt of payment of the DOL Claim at the distribution percentage approved by the Court for Class 2 claimants at the same intervals and at the same time as other Class 2 claimants.
- 2. Subject to the exclusions in the immediately following paragraph and upon receipt of the full amount owed pursuant to paragraph III. 1, the United States releases and discharges the Receiver, the Texas Commissioner of Insurance, and the Gramercy estate from any and all liability under 31 U.S.C. § 3713(b) in connection with the Gramercy liquidation.
- 3. Notwithstanding any other provision to this Release Agreement, the United States does not release the Receiver, the Texas Commissioner of Insurance, and the Gramercy estate for:
- (a) any claim arising under any criminal law or any liability under 31 U.S.C. § 3713(b) arising from any such claim;
- (b) any criminal, civil, or administrative claim, right or defense arising under Title 26, U.S. Code (Internal Revenue Code) or any liability under 31 U.S.C. § 3713(b) arising from any such claim;

- (c) any claim or action arising under 31 U.S.C. § 3729 et seq. (False Claims Act), 31 U.S.C. § 3801 et seq. (Program Frauds Civil Remedies Act), 42 U.S.C. § 1320a-7a (Civil Monetary Penalties statute), 29 U.S.C. Ch. 18 (Employee Retirement Income Security Program), 42 U.S.C. ch. 7 (The Social Security Act of 1935), or 42 U.S.C. § 1395y(b) (Medicare as Secondary Payer), or any liability under 31 U.S.C. § 3713(b) arising from any such claim;
- (d) any claim arising under any other statute or common law principle governing pension benefit, fraudulent conveyance or any other form of fraud, or any liability under 31 U.S.C. § 3713(b) arising from any such claim;
 - (e) any obligation created by this Release Agreement.
- 4. Under the terms of this Release Agreement, the United States or its duly authorized representative shall have the right, prior to the destruction of Gramercy's records in accordance with the orders of the Court, during normal business hours, on a date and at a location agreed upon by the Parties, to inspect, and if it wishes, to copy at its own expense, such documents, books, and records of the Gramercy estate and of the Receiver, as shall be reasonably necessary to determine the existence and amount of claims the United States may have against the Gramercy estate or the Receiver, or to determine the Receiver's compliance with the terms of this Release Agreement. No documents, books, or records of the Gramercy estate or the Receiver may be destroyed unless notice is given to the United States of any motion filed with the Court requesting approval of such destruction. If the Receiver does not request approval from the Court, he or she must obtain prior written authorization from the United States before destruction of any documents, books, or records of the Gramercy estate or the Receiver.
- 5. Except for the express undertakings of the Receiver and the United States in this Release Agreement, nothing in this Release Agreement shall be construed:

(a) to establish or perfect any claims, substantive rights, or procedural rights of the

United States;

(b) to limit, restrict, diminish, or defeat any claims, substantive rights, or procedural

rights of the United States;

(c) to establish or perfect any objections or defenses, substantive rights, or procedural

rights of the Receiver; or

(d) to limit, restrict, diminish, or defeat any defenses, substantive rights, or procedural

rights of the Receiver.

6. The Parties agree that this Release Agreement shall not be effective unless and

until it is approved by the Court, if approval is required, and the time for appeals of any such

approval has expired. The Parties further agree to cooperate with each other in seeking prompt

approval of this Release Agreement from the Court.

7. This Release Agreement may be executed by the Parties in any number of

counterparts, including counterparts transmitted by way of facsimile or email, and each of which

shall be deemed to be an original and all of which, collectively, shall be deemed to be one and

the same instrument. The Parties agree that an electronic signature alone may substitute for and

have the same legal effect as a manual signature.

SHARON WILLIAMS Digitally signed by SHARON WILLIAMS Date: 2022.02.11 14:37:46 -05'00'

By: Sharon C. Williams

Trial Attorney Civil Division

Department of Justice

Attorney for the United States

Dated: 02/16/2022 Ernesto A	Α.	Garza
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By: Ernesto A. Garza
President of Resolution
Oversight Corporation
Special Deputy Receiver for
Gramercy Insurance Company

AFFIDAVIT OF ERNESTO A. GARZA

STATE OF TEXAS §
COUNTY OF BEXAR §

- I, Ernesto A. Garza, being duly sworn, do depose and say as follows:
- 1. I am over the age of eighteen years and understand the obligations of an oath.
- I am the President of Resolution Oversight Corporation, the duly appointed
 Special Deputy Receiver of Gramercy Insurance Company ("SDR" and "Gramercy," respectively). I have personal knowledge of the facts set forth herein.
- 3. Gramercy was a stock property and casualty company organized on October 25, 1979, under the provisions of Chapter 822 of the Texas Insurance Code. On December 31, 1991, Gramercy was re-domesticated to the State of Delaware. Gramercy was re-domesticated back to the State of Texas on May 20, 1998. On February 29, 2000, Benchmark Holdings, Inc., a Georgia company, acquired Gramercy on February 28, 2000. Gramercy was licensed in thirty seven states, Alabama, Arkansas, Arizona, Colorado, Delaware, Florida, Georgia, Iowa, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, North Carolina, North Dakota, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin and Wyoming. At the time of receivership Gramercy primarily issued commercial auto, non-standard auto, warranty and credit policies. It also wrote some surety business in the 1980s and there was a small amount in run-off at the time of receivership.
- 4. On December 4, 2012, an Agreed Order Appointing Rehabilitator and Permanent Injunction was entered in The State of Texas and the Texas Department of Insurance v. Gramercy Insurance Company; Cause No. D-1-GV-12-001713; In the 53rd Judicial District

Court of Travis County, Texas (the "Receivership Court"), placing Gramercy in receivership and appointing the Commissioner of Insurance for the State of Texas as the Receiver ("Receiver"). The Receiver designated Resolution Oversight Corporation as SDR. On August 26, 2013, the rehabilitation proceeding was converted to a liquidation proceeding for Gramercy pursuant to an Order Appointing Liquidator and Permanent Injunction (the "Liquidation Order"). A copy of the Liquidation Order is attached here to as Exhibit A.

- 5. Gramercy's Employer (or Federal) Identification Number is 13-3002241.
- At the time of receivership, Gramercy's corporate office was located at 3109
 Crossing Park Road, Norcross, Georgia 30071, and the principal operations were located at 5000
 Quorum Dr., Suite 111, Dallas, Texas, 75254
 - 7. There are no open ancillary receiverships for Gramercy.
- 8. The Liquidation Order triggered the Texas Property and Casualty Insurance Guaranty Association and similar organizations in other states. The guaranty associations took over the handling of certain open and newly reported claims under insurance policies issued by Gramercy. Gramercy is only exposed for the settlements, judgments, and claims above the guaranty associations' coverage limits and within the policy limits and claims under policies not covered by the guaranty associations.
- 9. The SDR is aware of the reporting requirements contained in Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 (See 42 U.S.C. 1395y(b) (Section 1862(b) of the Social Security Act) and 42 C.F.R. Part 411) and is making every effort to comply with those requirements. Accordingly, the SDR is aware that to the extent that a settlement, judgment, award, or other payment to or on behalf of the injured party (receiving Medicare benefits) is funded from the assets of the estate of Gramercy, then Gramercy is the Responsible

Reporting Entity ("RRE"). However, with regard to those claims which are paid in full by the guaranty associations, Gramercy is not the RRE and therefore has no duty to report pursuant to 42 U.S.C. 1395y(b)(8).

- 10. Gramercy did not issue any group health plan policies and did not operate any group health plans. Therefore, the provisions of 42 U.S.C. Section 1395y(b)(7) (required submission of information by group health plans) does not apply to the Gramercy policies or to Gramercy or the SDR.
- 11. To date the Receivership Court has authorized the SDR to make four early access distributions to the guaranty associations. The Receivership Court has approved payment of 100% of the guaranty associations Class 1 claims and 10% of Class 2 claims. A copy of Tex. Ins. Code Ann.§ 443.301 is attached hereto as Exhibit B. Section 443.301 governs the priority of claims in insurance company receiverships in Texas. Pursuant to Tex. Ins. Code Ann. § 443.301(c) claims of the Federal Government are Class 3 claims.
- 12. Prior to the Liquidation Order, Gramercy reported claims to the Center for Medicare and Medicaid Services ("CMS") using different RRE accounts for each managing general agency or third party administrator depending on the line of business. The SDR continued Gramercy's reporting methods until the Liquidation Order was entered and the guaranty associations became the RREs. Since the Liquidation Order, the SDR has not paid any claims to individuals as the receivership court has not approved any such payments to date. At the time payments on non-guaranty associations (the "Non-GA Claims") are approved, the SDR will use the following procedures prior to making a distribution:
- Determine claims and produce claims reports for approval by the Receivership
 Court.

- b. Review approved claims reports for claims that could potentially be reportable to the CMS. Any claim which could potentially be reportable is reviewed for Medicare eligibility of the claimant and type of claim, injury and payment.
- c. If the claims are not reportable, the claims will be paid in accordance with the
 Orders approving the Claims Reports and distribution percentages.
- d. There have not been any reportable claims in Gramercy's estate at this time, but there is one claim which might be reportable to CMS. This claim will be reported to CMS if the claim is allowed and a distribution is to be paid.
- 13. Attached hereto as Exhibit C is a list of the Proofs of Claim ("POCs") filed against the Gramercy estate, which includes the name and address of the claimant, the classification, the amount sought by the claimant and the allowed amount of the claim if determined by the SDR. The POC list is sorted numerically by POC number.
- 14. Tex. Ins. Code Ann.§ 443.253(k) provides that the SDR is not required to determine the validity or amount of any claim unless it appears that there will be assets available for distribution to that Class. There will not be enough assets to pay Class 2 claims in full; therefore, the SDR is not required to determine claims in Classes below Class 2. The SDR has reviewed all Proofs of Claim ("POCs") for their classification. The SDR classified 558 POCs filed by parties other than guaranty associations. Of these classified Non-GA POCs, only 23 have been allowed as Class 1 or Class 2 claims and only 6 of the allowed POCs were filed by individuals. Of these 6 allowed individual POCs, 1 was allowed as a Class 2 claim for a deductible reimbursement on a property damage claim. The other 5 of these individual POCs were allowed as Class 2 claims for bodily injury. None of these allowed Class 2 claims for bodily injury are reportable to CMS. There are also 13 individual POCs for personal injury

claims that have not yet been determined. Of these, 1 will have to be reported to CMS if this claim is ultimately allowed by the SDR. The claim that will have to be reported to CMS if the POC is allowed by the SDR, is highlighted in yellow on Exhibit C. There were 17 other allowed Non-GA Class 1 and Class 2 POCs that were filed by companies for property damage claims, unearned premiums, attorney fees or providers for disputed medical care. None of these 17 claims are reportable to CMS. The remaining 535 Non-GA Claims consist of one Class 3 claim by the United States Department of Labor (discussed below) and 534 Class 5 (general creditor) claims by vendors of Gramercy, subrogation claims by insurance companies, or reimbursement claims by agents and reinsurance claims, all of which are below any Class 3 claims by the Federal Government, and are not reportable under 42 U.S.C. 1395y(b). There will be no distributions to Class 5 claimants.

- 15. From the SDR's research of Gramercy's history, Gramercy did not issue workers compensation policies and no POCs for workers compensation benefits were filed with the Gramercy estate. The SDR staff also searched Gramercy's databases for any policies related to workers compensation terms and nothing was located. Regardless, if there were any workers compensation claims, such claims would be covered 100% by the guaranty associations; therefore, the Gramercy estate would not be the RRE.
- 16. There were no POCs for environmental matters filed in the Gramercy estate. The SDR also searched the claims' lists of the guaranty associations and didn't find any such claims.
- 17. The SDR conducted an extensive search of all the old databases and could not find any commercial policies or claims other than commercial trucking policies. There were no commercial claims filed with any of the guaranty associations, other than trucking claims. There were no POCs filed with the Gramercy estate relating to commercial policies other than

commercial trucking claims. The SDR is unable to identify any other commercial policies.

18. A copy of the most recent financial statement prepared by the SDR is attached as

Exhibit D. Gramercy was part of a Consolidated Group for tax purposes until the common

parent, Bench Mark Holdings Inc., dissolved in 2013. Gramercy has filed a standalone Form

1020 PC since 2014. Form 1120 PC for tax year 2018 for Gramercy is attached as Exhibit E.

19. Gramercy did not write policies or bonds directly for the benefit of the federal

government or any of its agencies. There was one claim filed by the US Department of Labor

(POC 0670) for reimbursement of expenses paid for an employee that was injured by a

Gramercy insured. The SDR classified this claim as a Class 3 claim. This POC is located on

Exhibit C. The SDR also provided notice to those federal agencies identified in the books and

records of the estate as part of its procedures for providing notice of the receivership and of the

claims filing deadline. Attached as Exhibit F is the list of federal agencies identified and noticed,

but no POCs were received from any federal agencies other than the one by the US Department

of Labor. The SDR conducted an extensive search of the company records and located three

claims by Federal Agencies that were resolved prior to receivership. These claims are

summarized as follows:

1) Claimant: United States of America(Robins Air Force Base, GA)

DOL: 9/30/2008

Gramercy Insured: Basar Transport, Inc.

Insured pulled in and swiped a piece of machinery and a pole. Gramercy paid a property damage

claim of \$1,002.17 and received a release from the Air Force Base on November 25, 2008.

2) Claimant: United States of America (Fort Gilliem, GA) DOL: 11/4/2008

Gramercy Insured: May's Specialized Carriers

The insured vehicle was passing through an open gate on the base. The gate closed prior to the

trailer clearing the gate. The USA filed a claim for

IV passing through an open gate on base that proceeded to close prior to trailer clearing gate. US Gov't made a claim for \$2,700.00 in repairs. During the investigation by the claim adjuster, a US Government employee stated that the gate malfunctioned at times and closed too soon. Gramercy denied the claim on 2/23/2009. The USA never contested the denial. The file was

closed on 4/1/2009.

3)Claimant: US Postal Service

DOL: 5/23/2012

Gramercy Insured: Jass Trucking Inc

The Gramercy Insured was delivering a load when it struck the garage door and USPS building in Thenador, AZ. Gramercy paid a property damage claim of \$1,783.52 in PD on 8/23/2012 and received a release from the USPS.

20. By this Affidavit, the Gramercy estate requests a release of liability by the United States of America pursuant to 31 U.S.C. § 3713 so that the SDR may wind up the affairs of the estate.

Original signed by

RNESTO A. GARZA, President of Resolution Oversight Corporation, Special Deputy Receiver of Gramercy Insurance Company



Original signed by

Notary Public, State of Texas

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 FINAL REPORT OF CLAIMS

POC			Claim	Amount
Number	Claimant	Class	Disposition	Allowed
rtarribor	Jaman	Oldoo	Вюросноп	, morrod
GIC-0007	Oregon Insurance Guaranty Association	1	Allowed	\$70,936.81
GIC-0007	Oregon Insurance Guaranty Association	2	Allowed	119,741.97
GIC-0010	Kentucky Insurance Guaranty Association	1	Allowed	11,602.82
	Kentucky Insurance Guaranty Association	2	Allowed	9,000.00
GIC-0012	Texas Property and Casualty Insurance Guaranty Association	1	Allowed	3,691,656.36
	Texas Property and Casualty Insurance Guaranty Association	2	Allowed	3,166,664.92
GIC-0018	Alabama Insurance Guaranty Association	1	Allowed	204,623.22
GIC-0018	Alabama Insurance Guaranty Association	2	Allowed	174,176.00
	Tennessee Insurance Guaranty Associatio	1	Allowed	527,212.81
GIC-0060	Tennessee Insurance Guaranty Associatio	2	Allowed	209,204.33
GIC-0067	South Dakota Insurance Guaranty Association	1	Allowed	7,419.20
	Pennsylvania Property & Casualty Insurance Guaranty Association	1	Allowed	137,438.87
GIC-0068	Pennsylvania Property & Casualty Insurance Guaranty Association	2	Allowed	225,500.00
GIC-0069	Florida Insurance Guaranty Association	1	Allowed	2,047,071.65
	Florida Insurance Guaranty Association	2	Allowed	6,440,845.04
	Missouri Property & Casualty Insurance Guaranty Associatio	1	Allowed	124,504.86
GIC-0072	Missouri Property & Casualty Insurance Guaranty Associatio	2	Allowed	342,384.74
GIC-0094	Illinois Insurance Guaranty Associatior	1	Allowed	536,323.59
GIC-0094	Illinois Insurance Guaranty Associatior	2	Allowed	1,473,172.20
GIC-0104	Indiana Insurance Guaranty Association	1	Allowed	233,638.77
GIC-0104	Indiana Insurance Guaranty Association	2	Allowed	112,000.22
	MTA Bus Company	2	Allowed	35,000.00
	South Carolina Property & Casualty Insurance Guaranty Association	1	Allowed	146,138.45
GIC-0114	South Carolina Property & Casualty Insurance Guaranty Association	2	Allowed	464,965.55
GIC-0117	Nevada Insurance Guaranty Association	1	Allowed	33,403.33
GIC-0117	Nevada Insurance Guaranty Association	2	Allowed	334,685.60
	Peak Acceptance LLC	5	Allowed	4,274,600.09
GIC-0127	Peak Acceptance LLC	2	Allowed	1,442,585.72
GIC-0128 GIC-0128	Colorado Insurance Guaranty Assoc c/o Western Guaranty Fund Services Colorado Insurance Guaranty Assoc c/o Western Guaranty Fund Services	2	Allowed Allowed	2,715.00 500.00
GIC-0128	Idaho Insurance Guaranty Association c/o Western Guaranty Fund Services	1	Allowed	1,679.00
GIC-0129	Idaho Insurance Guaranty Association c/o Western Guaranty Fund Services	2	Allowed	17,657.89
GIC-0123	Kansas Insurance Guaranty Association (70 Western Guaranty Fund Services	1	Allowed	88,548.64
GIC-0130	Kansas Insurance Guaranty Assoc c/o Western Guaranty Fund Services	2	Allowed	205,065.27
GIC-0133	Washington Insurance Guaranty Assoc c/o Western Guaranty Fund Services	1	Allowed	88,930.37
GIC-0133	Washington Insurance Guaranty Assoc c/o Western Guaranty Fund Services	2	Allowed	130,278.55
GIC-0138	Georgia Insurers Insolvency Poo	1	Allowed	1,337,734.47
GIC-0138	Georgia Insurers Insolvency Poo	2	Allowed	1,537,984.46
GIC-0140	Utah Property & Casualty Insurance Guaranty Associatio	1	Allowed	240.81
GIC-0153	Virginia Property & Casualty Insurance Guaranty Associatio	1	Allowed	10,051.80
GIC-0154	(individual claimant)	2	Allowed	9,500.00
GIC-0170	Grady Memorial Hospita	2	Allowed	6,230.00
GIC-0229	Arizona Property and Casualty Insurance Guaranty Fun	1	Allowed	360,463.81
GIC-0235	Iowa Insurance Guaranty Associatior	1	Allowed	196,321.13
GIC-0235	Iowa Insurance Guaranty Associatior	2	Allowed	319,024.93
GIC-0237	Minnesota Insurance Guaranty Association	1	Allowed	23,947.88
GIC-0237	Minnesota Insurance Guaranty Associatio	2	Allowed	390,000.00
GIC-0392	Oklahoma Property & Casualty Insurance Guaranty Associatio	1	Allowed	64,561.05
GIC-0392	Oklahoma Property & Casualty Insurance Guaranty Associatio	2	Allowed	140,037.58
	Mississippi Insurance Guaranty Association	1	Allowed	722,766.32
GIC-0400	Mississippi Insurance Guaranty Association	2	Allowed	992,690.00
GIC-0401	Property & Casualty Insurance Guaranty Corporation (Maryland	2	Allowed	113.57
GIC-0607	Louisiana Insurance Guaranty Association	1	Allowed	89,892.94
GIC-0607	Louisiana Insurance Guaranty Associatio	2	Allowed	943,388.75
GIC-0611	Arkansas Property & Casualty Guaranty Fund	1	Allowed	11,870.23
GIC-0611	Arkansas Property & Casualty Guaranty Fund	2	Allowed	7,500.00
GIC-0664	(individual claimant)	2	Allowed	25,000.00
GIC-0670	United States Dept of Labor	2	Allowed	30,000.00
GIC-0679 GIC-0701	(individual claimant) (individual claimant)	2	Allowed	15,000.00
GIC-0/01	(muriuaa Galilani)	2	Allowed	35,000.00
			Total Allowed	\$34,401,191.57

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 FINAL REPORT OF CLAIMS

POC Number	Claimant	Class	Claim Disposition	Amount Allowed
GIC-0008	Active Health & Wellness Center	2	IGA Fully Covered	
GIC-0019	Peachtree Spine Physicians	2	Disallowed	
GIC-0052	Wheels, Inc.	5	Disallowed	
GIC-0061	(individual claimant)	2	Disallowed	
GIC-0062	(individual claimant)	2	Disallowed	
GIC-0063	(individual claimant)	2	Disallowed	
GIC-0064	(individual claimant)	2	Disallowed	
GIC-0066	Amwins Transportation Underwriters	5	Classified Only	
GIC-0080	New Mexico Property & Casualty Insurance Guaranty Association	1 & 2	Disallowed	
GIC-0086	North Carolina Insurance Guaranty Association	1 & 2	Disallowed	
GIC-0122	(individual claimant)	2	IGA Fully Covered	
GIC-0131	Montana Insurance Guaranty Assoc c/o Western Guaranty Fund Services	1 & 2	Disallowed	
GIC-0134	Wyoming Insurance Guaranty Assoc c/o Western Guaranty Fund Services	1 & 2	Disallowed	
GIC-0147	(individual claimant)	2	IGA Fully Covered	
GIC-0148	(individual claimant)	2	IGA Fully Covered	
GIC-0149	(individual claimant)	2	IGA Fully Covered	
GIC-0150	(individual claimant)	2	IGA Fully Covered	
GIC-0179	(individual claimant)	2	Disallowed	
GIC-0184	(individual claimant)	2	Disallowed	
GIC-0393	(individual claimant)	2	Disallowed	
GIC-0394	(individual claimant)	2	Disallowed	
GIC-0395	(individual claimant)	2	Disallowed	
GIC-0396	(individual claimant)	2	Disallowed	
GIC-0646	Arrow Freight Management, Inc.	2	Disallowed	
GIC-0648	(individual claimant)	2	IGA Fully Covered	
GIC-0662	(individual claimant)	5	Classified Only	
GIC-0663	(individual claimant)	5	Classified Only	
GIC-0668	(individual claimant)	2	Disallowed	
GIC-0669	Duplicate of 668			
GIC-0672	(individual claimant)	2	IGA Fully Covered	
GIC-0678	(individual claimant)	2	IGA Fully Covered	
GIC-0688	(individual claimant)	2	IGA Fully Covered	
GIC-0689	(individual claimant)	5	Classified Only	
GIC-0690	(individual claimant)	2	IGA Fully Covered	
GIC-0696	JMC Express LLC	5	Classified Only	
GIC-0698	(individual claimant)	5	Classified Only	
GIC-0709	(individual claimant)	5	Classified Only	
GIC-0710	(individual claimant)	5	Classified Only	
GIC-0711	State Farm Mutual Automobile Insurance Company	5	Classified Only	
GIC-0712	(individual claimant)	5	Classified Only	

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 ESTIMATED EXPENSE RESERVE FEBRUARY 2022 THROUGH MAY 2022

	Estimated Expenses
Estimated SDR Fees	
Administration	\$26,000
Accounting	19,000
Total SDR Fees	45,000
Estimated Miscellaneous Expenses	
Postage/Courier	1,000
Bank Charges	1,000
Other	1,000
Total Miscellaneous Expenses	3,000
Estimated Subcontractor Fees & Expenses	
Legal	10,500
Legal Expenses	500
Claim and Record Management	6,000
Records Storage Fees & Records Destruction	43,000
IT Subcontractor	4,100
Tax Subcontractor	7,000
Total Subcontractor Fees & Expenses	71,100
Estimated Other Fees & Expenses	
Digitization Fees TDI Records Retention	400
Liquidation Oversight Allocated Expenses	3,000
Special Master Fees	1,000
Total Other Fees & Expenses	4,400
Total Estimated Expense Reserve	\$123,500

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 DISTRIBUTION SCHEDULE

Class 1 007							Distribution
007	One was the company of Occasion to Accordation			at 100%			
	Oregon Insurance Guaranty Association	1	\$70,936.81	\$70,936.81	\$70,936.81		\$0.00
010	Kentucky Insurance Guaranty Association	1	11,602.82	11,602.82	11,602.82		0.00
012	Texas Property and Casualty Insurance Guaranty Association	1	3,691,656.36	3,691,656.36	3,626,630.36		65,026.00
018	Alabama Insurance Guaranty Association	1	204,623.22	204,623.22	203,786.00		837.22
060	Tennessee Insurance Guaranty Association	1	527,212.81	527,212.81	525,439.75		1,773.06
067	South Dakota Insurance Guaranty Association	1	7,419.20	7,419.20	6,261.50		1,157.70
068	Pennsylvania Property & Casualty Insurance Guaranty Association	1	137,438.87	137,438.87	137,438.87		0.00
069	Florida Insurance Guaranty Association	1	2,047,071.65	2,047,071.65	1,831,277.42	215,794.23	0.00
072	Missouri Property & Casualty Insurance Guaranty Association	1	124,504.86	124,504.86	0.00	124,504.86	0.00
094	Illinois Insurance Guaranty Association	1	536,323.59	536,323.59	536,323.59		0.00
104	Indiana Insurance Guaranty Association	1	233,638.77	233,638.77	233,638.77		0.00
114	South Carolina Property & Casualty Insurance Guaranty Association	1	146,138.45	146,138.45	0.00	146,138.45	0.00
117	Nevada Insurance Guaranty Association	1	33,403.33	33,403.33	0.00	33,403.33	0.00
128	Colorado Insurance Guaranty Assoc c/o Western Guaranty Fund Services	1	2,715.00	2,715.00	2,715.00		0.00
129	Idaho Insurance Guaranty Association c/o Western Guaranty Fund Services	1	1,679.00	1,679.00	1,679.00		0.00
130	Kansas Insurance Guaranty Assoc c/o Western Guaranty Fund Services	1	88,548.64	88,548.64	84,838.87		3,709.77
133	Washington Insurance Guaranty Assoc c/o Western Guaranty Fund Services	1	88,930.37	88,930.37	88,930.37		0.00
138	Georgia Insurers Insolvency Pool	1	1,337,734.47	1,337,734.47	1,282,327.92	36,417.82	18,988.73
140	Utah Property & Casualty Insurance Guaranty Association	1	240.81	240.81	240.81		0.00
153	Virginia Property & Casualty Insurance Guaranty Association	1	10,051.80	10,051.80	10,051.80		0.00
229	Arizona Property and Casualty Insurance Guaranty Fund	1	360,463.81	360,463.81	245,040.42		115,423.39
235	Iowa Insurance Guaranty Association	1	196,321.13	196,321.13	131,863.78		64,457.35
237	Minnesota Insurance Guaranty Association	1	23,947.88	23,947.88	23,947.88		0.00
392	Oklahoma Property & Casualty Insurance Guaranty Association	1	64,561.05	64,561.05	64,561.05		0.00
400	Mississippi Insurance Guaranty Association	1	722,766.32	722,766.32	643,854.14		78,912.18
607	Louisiana Insurance Guaranty Association	1	89,892.94	89,892.94	511.41	88,809.93	571.60
611	Arkansas Property & Casualty Guaranty Fund	1	11,870.23	11,870.23	10,107.73		1,762.50
					_		
	Total Class 1 Claims		10,771,694.19	10,771,694.19	9,774,006.07	645,068.62	352,619.50

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 DISTRIBUTION SCHEDULE

POC			Amount	Gross	Early Access	Previous Statutory	Proposed
Number	Claimant	Class	Allowed	Distribution	Payments	Deposits Applied	Distribution
Class 2	Claims						
114	South Carolina Property & Casualty Insurance Guaranty Association	2	464,965.55	358,861.55	0.00	358,861.55	0.00
	Total Class 2 Claims, partially covered by statutory deposit		464,965.55	358,861.55	0.00	358,861.55	0.00
Class 2	Claims						
117	Nevada Insurance Guaranty Association	2	334,685.60	191,596.67	0.00	191,596.67	0.00
	Total Class 2 Claims, partially covered by statutory deposit		334,685.60	191,596.67	0.00	191,596.67	0.00
				Pro-rata			
Class 2	Claims			at 31.6273842%			
007	Oregon Insurance Guaranty Association	2	119,741.97	37,871.25	17,403.41		20,467.84
010	Kentucky Insurance Guaranty Association	2	9,000.00	2,846.46	1,170.00		1,676.46
012	Texas Property and Casualty Insurance Guaranty Association	2	3,166,664.92	1,001,533.28	306,050.77		695,482.51
018	Alabama Insurance Guaranty Association	2	174,176.00	55,087.31	17,417.60		37,669.71
024	Crete Carrier	2	10,902.38	3,448.14	0.00		3,448.14
025	Northern Investors Company, LLC	2	200.00	63.25	0.00		63.25
027	Crete Carrier	2	100.00	31.63	0.00		31.63
060	Tennessee Insurance Guaranty Association	2	209,204.33	66,165.86	20,920.43		45,245.43
068	Pennsylvania Property & Casualty Insurance Guaranty Association	2	225,500.00	71,319.75	12,550.00		58,769.75
069	Florida Insurance Guaranty Association	2	6,440,845.04	2,037,070.81	634,384.50		1,402,686.31
072	Missouri Property & Casualty Insurance Guaranty Association	2	342,384.74	108,287.34	0.00	89,817.06	18,470.28
088	Memorial Hermann Health System	2	1,622.75	513.23	0.00		513.23
094	Illinois Insurance Guaranty Association	2	1,473,172.20	465,925.83	164,732.47		301,193.36
104	Indiana Insurance Guaranty Association	2	112,000.22	35,422.74	11,200.02		24,222.72
108	MTA Bus Company	2	35,000.00	11,069.58	0.00		11,069.58
127	Peak Acceptance LLC	2	1,442,585.72	456,252.13	0.00		456,252.13
128	Colorado Insurance Guaranty Assoc c/o Western Guaranty Fund Services	2	500.00	158.14	50.00		108.14
129	Idaho Insurance Guaranty Association c/o Western Guaranty Fund Services	2	17,657.89	5,584.73	1,576.29		4,008.44
130	Kansas Insurance Guaranty Assoc c/o Western Guaranty Fund Services	2	205,065.27	64,856.78	20,506.53		44,350.25
133	Washington Insurance Guaranty Assoc c/o Western Guaranty Fund Services	2	130,278.55	41,203.70	13,420.06		27,783.64

GRAMERCY INSURANCE COMPANY IN RECEIVERSHIP R-553 DISTRIBUTION SCHEDULE

POC			Amount	Gross	Early Access	Previous Statutory	Proposed
Number	Claimant	Class	Allowed	Distribution	Payments	Deposits Applied	Distribution
120	Coordin Inguisoro Ingolvonov Dool	2	1 527 004 46	486,424.25	148,613.45	<u> </u>	337,810.80
138 154	Georgia Insurers Insolvency Pool (individual claimant)	2	1,537,984.46 9,500.00	3,004.60	0.00		3,004.60
170	Grady Memorial Hospital	_	6,230.00	1,970.39	0.00		1,970.39
		2	,		0.00		
176	(individual claimant)	2	250,000.00	79,068.46			79,068.46
219	HNI Truck Group LLC	2	78,281.56	24,758.41	0.00		24,758.41
235	Iowa Insurance Guaranty Association	2	319,024.93	100,899.24	1,102.49		99,796.75
237	Minnesota Insurance Guaranty Association	2	390,000.00	123,346.80	39,000.00		84,346.80
392	Oklahoma Property & Casualty Insurance Guaranty Association	2	140,037.58	44,290.22	14,003.76		30,286.46
400	Mississippi Insurance Guaranty Association	2	992,690.00	313,961.88	46,784.00		267,177.88
401	Property & Casualty Insurance Guaranty Corporation (Maryland)	2	113.57	35.92	0.00		35.92
402	RIS Insurance Service and Medelez Inc.	2	56,330.00	17,815.71	0.00		17,815.71
607	Louisiana Insurance Guaranty Association	2	943,388.75	298,369.18	70,134.57	24,204.31	204,030.30
610	Standard Premium Finance	2	3,740.18	1,182.92	0.00		1,182.92
611	Arkansas Property & Casualty Guaranty Fund	2	7,500.00	2,372.05	750.00		1,622.05
653	assigned by individual claimant to Georgia Insurers Insolvency Pool	2	300,000.00	94,882.15	0.00		94,882.15
654	see poc 653	2	see poc 653	0.00	0.00		0.00
655	see poc 653	2	see poc 653	0.00	0.00		0.00
656	see poc 653	2	see poc 653	0.00	0.00		0.00
657	see poc 653	2	see poc 653	0.00	0.00		0.00
661	(individual claimant)	2	250.00	79.07	0.00		79.07
664	(individual claimant)	2	25,000.00	7,906.85	0.00		7,906.85
670	United Stated Dept of Labor	2	30,000.00	9,488.22	0.00		9,488.22
679	(individual claimant)	2	15,000.00	4,744.11	0.00		4,744.11
701	(individual claimant)	2	35,000.00	11,069.58	0.00		11,069.58
705	Rhino Services, LLC	2	12,612.05	3,988.86	0.00		3,988.86
	Total Class 2 Claims		19,269,285.06	6,094,370.81	1,541,770.35	114,021.37	4,438,579.09
	Total Class 1 Through Class 2 Claims Allowed		\$30,840,630.40	\$17,416,523.22	\$11,315,776.42	\$1,309,548.21	\$4,791,198.59

NOTICE OF PENDING DISTRIBUTION BY GRAMERCY INSURANCE COMPANY

As you were previously notified, Gramercy Insurance Company was placed in receivership. You filed a proof of claim (POC) in the receivership that was approved as a Class 2 claim. This notice is being sent to inform you about a proposed final distribution on approved Class 2 claims. You are *not* required to take any further action in order to receive any final distribution, unless you need to send an IRS Form W-9, current address or wire transfer instructions to the Special Deputy Receiver (SDR). If this notice was sent to the incorrect address or you changed banks, please notify the SDR of your correct address at the number below.

A *Final Report of Claims and Application to Make Final Distribution and Destroy Records* (Application) was filed in *The State of Texas v. Gramercy Insurance Company*, Cause D-1-GV-12-001713 in the 53rd Judicial District, Travis County, Texas (Receivership Court). In the Application, the Special Deputy Receiver asked the Receivership Court for approval of a proposed final *pro rata* distribution of approximately 31.627% to approved Class 2 claimants after the payment of administrative expenses. This proposed distribution is approximate based on current financial data, and the actual distribution may vary from this projection. The final amount of the distribution regarding your POC will not be confirmed until the Receivership Court enters the order approving the Application.

Upon entry of the order approving the *Application*, your distribution check will be sent by wire transfer or sent to the address you provided on the W-9 you sent to the SDR. If you have not previously sent a W-9, you must send a completed W-9 to the SDR to receive your distribution. Please ensure that you have provided the SDR with current payment information and/or a mailing address. Please be advised that your distribution check should be cashed as soon as possible from the date it is issued but in no event later than 30 days.

You do not need to call or write this office in order to receive a final distribution, except keeping the SDR advised of your current address and banking information for wire transfers. However, if you have any questions, you may contact the Special Deputy Receiver at eagarzasdr@aol.com. If you wish to review the Application, a copy is available at the SDR's website at www.gicreceivership.com or at the Travis County District Clerk's Office, 1000 Guadalupe, Austin, Texas or by requesting one by email to rstroud@thestroudfirm.com.

In accordance with the *Order of Reference to Master* entered in the above referenced cause *(Order of Reference)*, the Application will be submitted for approval before the Special Master, Tom Collins (Master) on Monday, April 11, 2022 (Submission Date). If you wish to file an objection to the *Application*, including, but not limited to, any objection to the approved expenses, or any claims, you must follow these rules:

- 1. The Master may consider the Application by written submission or oral hearing.
- 2. If no objection is filed in compliance with the *Order of Reference*, the Master may consider the Application without a hearing, and the Court may enter the order recommended by the Master upon its submission to the Court. A party waives any right to object to the recommendation of the Master if the party does not file an objection in compliance with the *Order of Reference*.
- 3. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the Submission Date in the above referenced case.
- 4. A copy of any objection must be sent by email to each of the following:
 - (a) The Master's Docket Clerk at SpecialMasterClerk@tdi.texas.gov.
 - (b) All parties listed on the Certificate of Service attached to the Application.
 - (c) The Applicant's counsel: Rachel Stroud at <u>rstroud@thestroudfirm.com</u>

Any objection must specifically set out the reasons for the objection, with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally by the Master.

- 5. An objecting party must expeditiously coordinate with the Applicant's counsel and with the Master's docket clerk at (512) 676-6915 to request a hearing, unless the Master determines that a hearing is not necessary. If a hearing is granted, the objecting party must send a Notice of Oral Hearing to the Applicant's counsel and all parties listed on the Certificate of Service.
- 6. Any Acknowledgment of Notice and Waiver by a party in interest should be filed at least three (3) calendar days before the submission or hearing date.

You are required to follow these procedures <u>only</u> if you have an objection to the Application. You are <u>not</u> required to follow these procedures to obtain a distribution.

Transfer of CBL Proof of Claim and Unknown Assets from **Gramercy Insurance Company to the Commissioner of Insurance**

Whereas:

On December 4, 2012, Gramercy was placed in receivership by the 53rd Judicial District Court of
Travis County, Texas (District Court). The District Court appointed the Commissioner of
Insurance (Commissioner) as Receiver of Gramercy, vesting the Receiver with all rights to
Gramercy's assets.

The Receiver appointed Resolution Oversight Corporation as Special Deputy Receiver (SDR) of Gramercy, granting the SDR all of the Receiver's powers. The SDR filed a *Final Report of Claims* and Application to Make Final Distribution and Destroy Records (Application) on 2022, which requested approval to transfer Gramercy's known, unliquidated assets, including the CBL POC, and Gramercy's unknown assets to the Commissioner.

Gramercy Insurance Company (Gramercy) has an approved unsecured proof of claim in the High Court of New Zealand Auckland Register CIV-2018-404-000306 in the liquidation of CBL Insurance Ltd. f/k/a Contractor's Bonding, Ltd. (CBL POC) with a remaining balance of \$583,501.67. CBL is still in the process of liquidating and has not yet determined the pro rata amount or timing of distributions, but such will occur after the closing of the Gramercy receivership proceeding, and Approval Order as outlined below.

The District Court entered an Order Approving Final Report of Claims, Authorizing Final Distribution and Destruction of Records (Approval Order) on , 2022, which approved the Application, and authorized the SDR to execute any documents necessary to effectuate the purposes of the Application and the Approval Order.

Therefore, in accordance with the Approval Order, Resolution Oversight Corporation executes

this transfer to the Commis unknown assets.	ssioner of Gra	amercy's right, title, and interest in the CBL POC and any
Witness my hand this	day of	, 2022.
		By:
		Ernesto Garza, as President of
		Resolution Oversight Corporation
STATE OF TEXAS	§ § §	
COUNTY OF BEXAR	§	
me that he has read the a	oration, who, above docum	, 2022, came before me Ernesto Garza, President of after being duly sworn, stated, and acknowledged before ent and that he has signed the above document for the apacity expressed in the document.
		Notary Public – State of Texas

GRAMERCY INSURANCE COMPANY

RECORDS TO BE DESTROYED

BoxID	Description
131123870	POLICIES HO (BOXES FROM IRON MOUNTAIN)
131123873	MISC ACCOUNTING WORKPAPERS
131123874	POLICIES HO (BOXES FROM IRON MOUNTAIN)
131123875	MISC ACCOUNTING WORKPAPERS
131123876	POLICIES MISC. (Old records from Iron Mountain storage)
131123877	POLICIES MISC (Old records from Iron Mountain storage)
131123880	CHECK COPIES 1997 (Old records from Iron Mountain storage)
131123883	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
131123884	DESPOSIT TICKETS (BOXES FROM IRON MOUNTAIN)
131123886	POLICIES MISC 1998 (BOXES FROM IRON MOUNTAIN)
131123887	MISC ACCOUNTING WORKPAPERS
131123893	MISC ACCOUNTING WORKPAPERS
131123894	POLICIES HO 1998 (BOXES FROM IRON MOUNTAIN)
131123916	MISC ACCOUNTING WORKPAPERS
131123921	CASH RECEIPTS (BOXES FROM IRON MOUNTAIN)
131123933	MISC REPORTS, WORK PRODUCT (BOXES FROM IRON MOUNTAIN)
131123934	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
131123935	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
131123936	FILINGS, FORMS/POLICY (BOXES FROM IRON MOUNTAIN)
131123937	CLAIMS (BOXES FROM IRON MOUNTAIN)
131123939	FINANCIAL WORKPAPERS (BOXES FROM IRON MOUNTAIN)
	MISC ACCOUNTING WORKPAPERS
131123943	MISC ACCOUNTING WORKPAPERS
131123944	POLICIES MISC. (BOXES FROM IRON MOUNTAIN)
131123990	MISC ACCOUNTING WORKPAPERS
131124040	MISC ACCOUNTING WORKPAPERS
131124101	POLICIES MISC 1998 (BOXES FROM IRON MOUNTAIN)
131124126	FINANCIAL WORKPAPERS (BOXES FROM IRON MOUNTAIN)
131124134	POLICIES 19999 (BOXES FROM IRON MOUNTAIN)
	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
	POLICIES 1999 (BOXES FROM IRON MOUNTAIN)
	POLICIES MISC (BOXES FROM IRON MOUNTAIN)
	POLICIES MISC. (BOXES FROM IRON MOUNTAIN)
	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
	POLICY FILES, MIXTURE (BOXES FROM IRON MOUNTAIN)
	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
	POLICIES 1998 (BOXES FROM IRON MOUNTAIN)
	POLICIES 19999 (BOXES FROM IRON MOUNTAIN)
	POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
131124159	POLICIES MISC 1999 (BOXES FROM IRON MOUNTAIN)

BoxID Description 131124160 POLICIES MISC 1999 (BOXES FROM IRON MOUNTAIN) 161243007 BOND FILES (BOXES FROM IRON MOUNTAIN) 172705663 CORPORATE SEAL PRESSES 172705710 PREMIUM TAXES, REINSURANCE (BOXES FROM IRON MOUNTAIN) 172705792 POLICIES TRUCKING 2010 (BOXES FROM IRON MOUNTAIN) 172705793 POLICIES TRUCKING 2007 (BOXES FROM IRON MOUNTAIN) 172705837 MISC ACCOUNTING WORKPAPERS 172705841 MISC ACCOUNTING WORKPAPERS 172705869 POLIES MISC. 1999 (BOXES FROM IRON MOUNTAIN) 172705870 MISC ACCOUNTING WORKPAPERS 172705882 MISC ACCOUNTING WORKPAPERS 172705886 CORPORATE SEAL PRESSES 172705893 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS
161243007 BOND FILES (BOXES FROM IRON MOUNTAIN) 172705663 CORPORATE SEAL PRESSES 172705710 PREMIUM TAXES, REINSURANCE (BOXES FROM IRON MOUNTAIN) 172705792 POLICIES TRUCKING 2010 (BOXES FROM IRON MOUNTAIN) 172705793 POLICIES TRUCKING 2007 (BOXES FROM IRON MOUNTAIN) 172705837 MISC ACCOUNTING WORKPAPERS 172705841 MISC ACCOUNTING WORKPAPERS 172705869 POLIES MISC. 1999 (BOXES FROM IRON MOUNTAIN) 172705870 MISC ACCOUNTING WORKPAPERS 172705882 MISC ACCOUNTING WORKPAPERS 172705886 CORPORATE SEAL PRESSES 172705893 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS
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172705793 POLICIES TRUCKING 2007 (BOXES FROM IRON MOUNTAIN) 172705837 MISC ACCOUNTING WORKPAPERS 172705841 MISC ACCOUNTING WORKPAPERS 172705869 POLIES MISC. 1999 (BOXES FROM IRON MOUNTAIN) 172705870 MISC ACCOUNTING WORKPAPERS 172705882 MISC ACCOUNTING WORKPAPERS 172705886 CORPORATE SEAL PRESSES 172705893 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS 172705903 MISC ACCOUNTING WORKPAPERS
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172705869 POLIES MISC. 1999 (BOXES FROM IRON MOUNTAIN) 172705870 MISC ACCOUNTING WORKPAPERS 172705882 MISC ACCOUNTING WORKPAPERS 172705886 CORPORATE SEAL PRESSES 172705893 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS 172705903 MISC ACCOUNTING WORKPAPERS
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172705886 CORPORATE SEAL PRESSES 172705893 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS 172705903 MISC ACCOUNTING WORKPAPERS
172705893 MISC ACCOUNTING WORKPAPERS 172705895 MISC ACCOUNTING WORKPAPERS 172705903 MISC ACCOUNTING WORKPAPERS
172705895 MISC ACCOUNTING WORKPAPERS 172705903 MISC ACCOUNTING WORKPAPERS
172705903 MISC ACCOUNTING WORKPAPERS
172705910 POLIES MISC. 1999 (BOXES FROM IRON MOUNTAIN)
172705916 MIS OFFICE FORMS, REPORTS, WORK PRODUCT (BOXES FROM IRON MOUNTAIN)
172705917 POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
172705918 POLICY, PREMIUM FILES (BOXES FROM IRON MOUNTAIN)
172705922 HO CLAIMS, POLICIES 1998 (BOXES FROM IRON MOUNTAIN)
190196607 MISC ACCOUNTING WORKPAPERS
195845004 FINANCIAL WORKPAPERS (BOXES FROM IRON MOUNTAIN)
195845049 MISC ACCOUNTING WORKPAPERS
195845058 QUARTERLY FINANCIAL WORKPAPERS (BOXES FROM IRON MOUNTAIN)
195845088 POLICIES MISC (BOXES FROM IRON MOUNTAIN)
274229646 POLICIES TRUCKING 2003 (BOXES FROM IRON MOUNTAIN)
274229680 FINANCIAL WORKPAPERS (BOXES FROM IRON MOUNTAIN)
274229712 MISC ACCOUNTING WORKPAPERS
274229714 MISC ACCOUNTING WORKPAPERS
274229760 FINANCIAL WORKPAPERS (BOXES FROM IRON MOUNTAIN)
274229761 FINANCIAL WORKPAPERS (Old records from Iron Mountain storage)
274229762 MISC ACCOUNTING WORKPAPERS
274229827 CLAIMS BUILDERS RISK (BOXES FROM IRON MOUNTAIN)
274229828 CLAIMS TRUCKING 2006 (Old records from Iron Mountain storage)
274229829 CLAIMS - BUILDERS RISK (BOXES FROM IRON MOUNTAIN)
274229830 CLAIMS TRUCKING 2006 (BOXES FROM IRON MOUNTAIN)
274229831 POLICIES - BUILDERS RISK (BOXES FROM IRON MOUNTAIN)
274229851 MISC ACCOUNTING WORKPAPERS
274229852 MISC ACCOUNTING WORKPAPERS
274229855 MISC ACCOUNTING WORKPAPERS
274229856 MISC ACCOUNTING WORKPAPERS
274229857 MISC ACCOUNTING WORKPAPERS
274229861 MISC ACCOUNTING WORKPAPERS
274229876 MISC ACCOUNTING WORKPAPERS
40305197 POLICIES - TRUCKING (BOXES FROM IRON MOUNTAIN)
40305198 BOND RECORDS (BOXES FROM IRON MOUNTAIN)

BoxID	Description
40305201	BOND RECORDS (BOXES FROM IRON MOUNTAIN)
40305203	SURETLY BOND CLAIM WORKSHEETS (BOXES FROM IRON MOUNTAIN)
40305208	BOND RECORDS (Old records from Iron Mountain storage)
40305210	POLICIES MISC 1997 (Old records from Iron Mountain storage)
40305273	FINANCIAL WORKPAPERS (Old records from Iron Mountain storage)
40305275	POLICIES - FARM/RANCH (Old records from Iron Mountain storage)
	POLICIES - LIABILITY (Old records from Iron Mountain storage)
40305277	BOND RECORDS (Old records from Iron Mountain storage)
40305280	BOND RECORDS (Old records from Iron Mountain storage)
40305281	BOND RECORDS (Old records from Iron Mountain storage)
40305288	POLICIES - LIABILITY (Old records from Iron Mountain storage)
40305293	MISC ACCOUNTING WORKPAPERS
40305296	POLICIES - LIABILITY (Old records from Iron Mountain storage)
440305269	BOND RECORDS (Old records from Iron Mountain storage)
440305286	BOND RECORDS (Old records from Iron Mountain storage)
703370751	MISC ACCOUNTING WORKPAPERS
703370752	MISC ACCOUNTING WORKPAPERS
703370754	MISC ACCOUNTING WORKPAPERS
703370756	MISC ACCOUNTING WORKPAPERS
703370757	MISC ACCOUNTING WORKPAPERS
73315360	POLICIES - FARM AND RANCH (Old records from Iron Mountain storage)
73315563	POLICIES - FARM AND RANCH (Old records from Iron Mountain storage)
95996532	FINANCIAL WORKPAPERS (Old records from Iron Mountain storage)
95996719	BOND RECORDS (Old records from Iron Mountain storage)
BIF100001	Company Vehicles
BIF100002	MISC WORK PRODUCT
BIF100003	Annual Statements
BIF100005	Company Credit Cards
BIF100006	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100007	Misc. proposals, work product, bond info
BIF100008	Misc. filings,, POAs, certificates
BIF100009	Misc. manuals, work product
BIF100010	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100011	Financial workpapers, reports
BIF100012	AP files
BIF100013	Employee records, benefits
BIF100014	Employee records, benefits
BIF100015	Employee records, benefits
BIF100016	Employee records, benefits
BIF100017	Employee records, benefits
BIF100018	Employee records, benefits
BIF100019	Employee records, benefits
BIF100020	Employee records, benefits
BIF100021	Employee records, benefits
BIF100022	Employee records, benefits
BIF100023	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT

BoxID	Description
BIF100024	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100025	MIX - misc. and Claims GRM CLOSED
BIF100026	MIX - claims and agency files
BIF100027	Misc. agent files
BIF100028	Misc. manuals
BIF100029	Misc. manuals
BIF100030	Misc. work product, manuals
BIF100031	Misc. work product, manuals
BIF100032	Misc. work product, manuals
BIF100033	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100034	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100035	Trucking claim files CLOSED
BIF100036	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100037	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100038	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100039	Misc. reports, agent files, work product
BIF100040	Misc., annual statements
BIF100041	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100042	Misc. claim reports, reinsurance reports, warranty program files
BIF100043	MISC. ACCOUNTING AND WORK PRODUCT
BIF100044	MISC. WORK PRODUCT
BIF100045	MISC. WORK PRODUCT
BIF100046	MISC. WORK PRODUCT
BIF100047	MISC. ACCOUNTING AND WORK PRODUCT
BIF100048	STATE FILINGS
BIF100049	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100050	STATE FILINGS
BIF100051	MISC. WORK PRODUCT
BIF100052	STATE FILINGS
BIF100053	MISC. WORK PRODUCT
BIF100054	MISC. WORK PRODUCT
BIF100055	MISC. WORK PRODUCT
BIF100056	MISC. WORK PRODUCT
BIF100057	MISC. WORK PRODUCT
BIF100058	MISC. MANUALS
BIF100059	MISC. MANUALS
BIF100060	MISC. MANUALS
BIF100061	MISC. MANUALS
BIF100062	MISC. MANUALS
BIF100063	MISC. MANUALS
BIF100064	STATE FILINGS
BIF100065	STATE FILINGS
BIF100066	MISC. MANUALS
BIF100067	MISC. MANUALS
BIF100068	BONDS
BIF100069	MISC. WORK PRODUCT

BoxID	Description
BIF100070	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100071	MISC. WORK PRODUCT
BIF100072	MISC. MANUALS
BIF100073	MISC. WORK PRODUCT
BIF100074	MISC. MANUALS
BIF100075	EMPLOYEE FILES
BIF100076	MISC. WORK PRODUCT
BIF100077	MISC. MANUALS
BIF100078	MISC. WORK PRODUCT
BIF100079	MISC. WORK PRODUCT
BIF100080	MISC. WORK PRODUCT
BIF100081	MISC. ACCOUNTING AND WORK PRODUCT
BIF100082	MISC. ACCOUNTING AND WORK PRODUCT
BIF100083	MISC. WORK PRODUCT
BIF100084	MISC. MANUALS
BIF100085	MISC. WORK PRODUCT
BIF100086	MISC. WORK PRODUCT
BIF100087	MISC. MANUALS
BIF100088	ANNAUL STATEMENTS 1999-2011
BIF100089	MISC. WORK PRODUCT
BIF100090	MISC. ACCOUNTING AND WORK PRODUCT
BIF100091	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100092	MISC. ACCOUNTING AND WORK PRODUCT
BIF100093	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100094	ANNAUL STATEMENTS 1999-2011
BIF100095	ANNAUL STATEMENTS 1999-2011
BIF100096	MISC. MANUALS
BIF100097	MISC. MANUALS
BIF100098	MANUALS
BIF100099	MISC. MANUALS
BIF100100	MISC. ACCOUNTING AND WORK PRODUCT
BIF100101	MISC. WORK PRODUCT
BIF100102	MISC. MANUALS
BIF100103	MISC. MANUALS
BIF100104	MISC. ACCOUNTING AND WORK PRODUCT
BIF100105	MISC. WORK PRODUCT
BIF100106	MISC. WORK PRODUCT
BIF100107	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100108	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100109	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100110	MISC. WORK PRODUCT
BIF100111	MISC. ACCOUNTING AND WORK PRODUCT
BIF100113	MISC. ACCOUNTING AND WORK PRODUCT
BIF100114	MISC. POLICY REPORTS, DOCUMENTS
BIF100115	MISC. ACCOUNTING AND WORK PRODUCT
BIF100116	MANUALS

BoxID	Description
BIF100117	MISC. ACCOUNTING AND WORK PRODUCT
BIF100118	MISC. ACCOUNTING AND WORK PRODUCT
BIF100119	MISC. WORK PRODUCT
BIF100120	MISC. ACCOUNTING AND WORK PRODUCT
BIF100121	STATE FILING
BIF100122	MISC. ACCOUNTING AND WORK PRODUCT
BIF100123	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100124	MISC. ACCOUNTING AND WORK PRODUCT
BIF100125	ANNUAL STATEMENTS
BIF100126	STATE FILING
BIF100127	POLICY FILES
BIF100128	POLICY RECORDS
BIF100129	MISC. ACCOUNTING AND WORK PRODUCT
BIF100130	MISC. WORK PRODUCT
BIF100131	UNDERWRITING, QUOTES
BIF100132	CLAIM CHECK COPIES
BIF100133	POLICY FORMS
BIF100134	POLICY FILES
BIF100135	POLICY FILES
BIF100136	POLICY FILES
BIF100137	MISC. WORK PRODUCT
BIF100138	POLICY FILES
BIF100139	POLICY FILES
BIF100140	POLICY FILES
BIF100141	POLICY FILES
BIF100142	POLICY FILES
BIF100143	POLICY FILES
BIF100144	POLICY FILES
BIF100145	POLICY FILES
BIF100146	POLICY FILES
BIF100147	POLICY FILES
BIF100148	POLICY FILES
BIF100149	MISC. ACCOUNTING AND WORK PRODUCT
BIF100150	ANNUAL STATEMENTS
BIF100151	POLICY FILES
BIF100152	POLICY FILES
BIF100153	POLICY FILES
BIF100154	POLICY FILES
BIF100155	POLICY FILES
BIF100156	POLICY FILES
BIF100157	POLICY FILES
BIF100158	POLICY FILES
BIF100159	POLICY FILES
BIF100160	POLICY FILES
BIF100161	POLICY FILES
BIF100162	POLICY FILES

BoxID	Description
BIF100163	POLICY FILES
BIF100164	POLICY FILES
BIF100165	POLICY FILES
BIF100166	POLICY FILES
BIF100167	POLICY FILES
BIF100168	POLICY FILES
BIF100169	POLICY FILES
BIF100170	POLICY FILES
BIF100171	POLICY FILES
BIF100172	POLICY FILES
BIF100173	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100174	MISC. ACCOUNTING AND WORK PRODUCT
BIF100175	CLAIM FILES
BIF100176	CLAIM FILES
BIF100177	CLAIM FILES
BIF100178	CLAIM FILES
BIF100179	CLAIM FILES
BIF100180	MISC. ACCOUNTING AND WORK PRODUCT
BIF100181	MISC. ACCOUNTING AND WORK PRODUCT
BIF100182	MISC. WORK PRODUCT
BIF100183	LOSS RUNS
BIF100184	STATE FILINGS
BIF100186	MISC. ACCOUNTING AND WORK PRODUCT
BIF100187	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100188	MISC. ACCOUNTING AND WORK PRODUCT
BIF100189	STATE FILINGS
BIF100190	STATE FILINGS
BIF100191	MISC. ACCOUNTING AND WORK PRODUCT
BIF100192	CLAIM FILES
BIF100193	MISC. ACCOUNTING AND WORK PRODUCT
BIF100194	MISC. ACCOUNTING AND WORK PRODUCT
BIF100195	ANNAUL STATEMENTS
BIF100196	MISC. WORK PRODUCT
BIF100197	MISC. WORK PRODUCT
BIF100198	POLICY FILES
BIF100199	MISC. MANUALS
BIF100200	MISC. WORK PRODUCT
BIF100201	POLICY FILES
BIF100202	POLICY FILES
BIF100203	POLICY FILES
BIF100204	POLICY FILES
BIF100205	POLICY FILES
BIF100206	POLICY FILES
BIF100207	POLICY FILES
BIF100208	POLICY FILES
BIF100209	MISC. WORK PRODUCT

BoxID	Description
BIF100210	POLICY FILES
BIF100211	POLICY FILES
BIF100212	POLICY FILES
BIF100213	POLICY FILES
BIF100214	POLICY FILES
BIF100215	POLICY FILES
BIF100216	POLICY FILES
BIF100217	POLICY FILES
BIF100218	POLICY FILES
BIF100219	POLICY FILES
BIF100220	POLICY FILES
BIF100221	POLICY FILES
BIF100222	POLICY FILES
BIF100223	POLICY FILES
BIF100224	POLICY FILES
BIF100225	POLICY FILES
BIF100226	POLICY FILES
BIF100227	POLICY FILES
BIF100228	POLICY FILES
BIF100229	POLICY FILES
BIF100230	POLICY FILES
BIF100231	POLICY FILES
BIF100232	POLICY FILES
BIF100233	POLICY FILES
BIF100234	POLICY FILES
BIF100235	POLICY FILES
BIF100236	POLICY FILES
BIF100237	POLICY FILES
BIF100238	POLICY FILES
BIF100239	POLICY FILES
BIF100240	POLICY FILES
BIF100241	POLICY FILES
BIF100242	POLICY FILES
BIF100243	POLICY FILES
BIF100244	POLICY FILES
BIF100245	POLICY FILES
BIF100246	MISC. ACCOUNTING AND WORK PRODUCT
BIF100247	MISC. ACCOUNTING AND WORK PRODUCT
BIF100248	MISC. ACCOUNTING AND WORK PRODUCT
BIF100249	MISC. ACCOUNTING AND WORK PRODUCT
BIF100250	MISC. ACCOUNTING AND WORK PRODUCT
BIF100251	MISC. ACCOUNTING AND WORK PRODUCT
BIF100252	MISC. ACCOUNTING AND WORK PRODUCT
BIF100253	MISC. ACCOUNTING AND WORK PRODUCT
BIF100254	MISC. ACCOUNTING AND WORK PRODUCT
BIF100255	MISC. ACCOUNTING AND WORK PRODUCT

BoxID	Description
BIF100256	MISC. ACCOUNTING AND WORK PRODUCT
BIF100257	MISC. MANUALS
BIF100259	MISC. ACCOUNTING AND WORK PRODUCT
BIF100260	MISC. ACCOUNTING AND WORK PRODUCT
BIF100261	STATE FILINGS
BIF100262	MISC. WORK PRODUCT
BIF100263	MISC. ACCOUNTING AND WORK PRODUCT
BIF100264	MANUALS
BIF100265	MISC. ACCOUNTING AND WORK PRODUCT
BIF100266	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100267	CLAIM FILES
BIF100268	CLAIM FILES
BIF100269	POLICY FILES
BIF100270	CLAIM FILES
BIF100271	POLICY FILES
BIF100272	MISC. WORK PRODUCT
BIF100273	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100274	POLICY FILES
BIF100275	MISC. ACCOUNTING AND WORK PRODUCT
BIF100276	MISC. ACCOUNTING AND WORK PRODUCT
BIF100277	MISC. ACCOUNTING AND WORK PRODUCT
BIF100278	MISC. ACCOUNTING AND WORK PRODUCT
BIF100279	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100280	MISC. WORK PRODUCT
BIF100281	POLICY FILES
BIF100282	MISC. WORK PRODUCT
BIF100283	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100284	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100285	MISC. ACCOUNTING AND WORK PRODUCT
BIF100286	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100287	MISC. WORK PRODUCT
BIF100288	MISC. ACCOUNTING AND WORK PRODUCT
BIF100289	MISC. ACCOUNTING AND WORK PRODUCT
BIF100290	MISC. ACCOUNTING AND WORK PRODUCT
BIF100291	MISC. ACCOUNTING AND WORK PRODUCT
BIF100292	MISC. WORK PRODUCT
BIF100293	STATE FILINGS
BIF100294	MISC. ACCOUNTING AND WORK PRODUCT
BIF100295	MISC. ACCOUNTING AND WORK PRODUCT
BIF100296	MISC. ACCOUNTING AND WORK PRODUCT
BIF100297	MISC. ACCOUNTING AND WORK PRODUCT
BIF100298	MISC. ACCOUNTING AND WORK PRODUCT
BIF100299	MISC. ACCOUNTING AND WORK PRODUCT
BIF100300	MISC. ACCOUNTING AND WORK PRODUCT
BIF100301	POLICY FILES
BIF100302	POLICY FILES

BoxID	Description
BIF100303	POLICY FILES
BIF100304	POLICY FILES
BIF100305	POLICY FILES
BIF100306	POLICY FILES
BIF100307	POLICY FILES
BIF100308	POLICY FILES
BIF100309	POLICY FILES
BIF100310	POLICY FILES
BIF100311	POLICY FILES
BIF100312	POLICY FILES
BIF100313	POLICY FILES
BIF100314	POLICY FILES
BIF100315	POLICY FILES
BIF100316	POLICY FILES
BIF100317	POLICY FILES
BIF100318	POLICY FILES
BIF100319	POLICY FILES
BIF100320	POLICY FILES
BIF100321	POLICY FILES
BIF100322	POLICY FILES
BIF100323	POLICY FILES
BIF100324	POLICY FILES
BIF100325	POLICY FILES
BIF100326	POLICY FILES
BIF100327	POLICY FILES
BIF100328	POLICY FILES
BIF100329	POLICY FILES
BIF100330	POLICY FILES
BIF100331	POLICY FILES
BIF100332	POLICY FILES
BIF100333	POLICY FILES
BIF100334	POLICY FILES
BIF100335	POLICY FILES
BIF100336	POLICY FILES
BIF100337	POLICY FILES
BIF100338	POLICY FILES
BIF100339	POLICY FILES
BIF100340	POLICY FILES
BIF100341	POLICY FILES
BIF100342	POLICY FILES
BIF100343	POLICY FILES
BIF100344 BIF100345	POLICY FILES POLICY FILES
BIF100345	CLAIM FILES
BIF100346 BIF100348	CLAIM FILES CLAIM FILES
BIF100546	MISC. ACCOUNTING AND WORK PRODUCT
דווחחחחד	INITISC. ACCOUNTING AND WORK PRODUCT

BoxID	Description
BIF100602	MISC. ACCOUNTING AND WORK PRODUCT
BIF100603	MISC. ACCOUNTING AND WORK PRODUCT
BIF100604	MISC. MANUALS
BIF100605	MISC. ACCOUNTING AND WORK PRODUCT
BIF100606	MISC. MANUALS
BIF100607	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100608	MISC. WORK PRODUCT
BIF100609	STATE FILINGS
BIF100610	MISC. ACCOUNTING AND WORK PRODUCT
BIF100611	MISC. MANUALS
BIF100612	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100613	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100614	MISC. WORK PRODUCT
BIF100615	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100616	MISC. ACCOUNTING AND WORK PRODUCT
BIF100617	STATE FILINGS
BIF100618	STATE FILINGS
BIF100619	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100620	MISC. MANUALS
BIF100621	MISC. WORK PRODUCT
BIF100622	MISC. ACCOUNTING AND WORK PRODUCT
BIF100623	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF100624	POLICY FILES
BIF100625	POLICY FILES
BIF100626	POLICY FILES
BIF100627	POLICY FILES
BIF100630	MISC. WORK PRODUCT
BIF100631	POLICY FILES
BIF100632	POLICY FILES
BIF100633	POLICY FILES
BIF100634	MISC. WORK PRODUCT
BIF100635	MISC. WORK PRODUCT
BIF100636	MISC. WORK PRODUCT
BIF100637	MISC. WORK PRODUCT
BIF100638	MISC. MANUALS
BIF100639	MISC. WORK PRODUCT
BIF100640	POLICY FILES
BIF100641	POLICY FILES
BIF100642	POLICY FILES
BIF100643	POLICY FILES
BIF100644	POLICY FILES
BIF100645	POLICY FILES
BIF100646	POLICY FILES
BIF100647	POLICY FILES
BIF100661	POLICY FILES
BIF100662	MANUALS

BoxID	Description
BIF100663	Closing box 884
BIF100666	Closing box 707
BIF100667	Closing box 708
BIF100668	Closing box 436
BIF100669	Closing box 437
bif100932	CLAIM FILES
bif100933	CLAIM FILES
bif100934	CLAIM FILES
bif100935	CLAIM FILES
bif100936	CLAIM FILES
BIF100937	CLAIM FILES
bif100938	CLAIM FILES
bif100940	CLAIM FILES
bif100941	CLAIM FILES
bif100942	CLAIM FILES
bif100943	CLAIM FILES
bif100944	CLAIM FILES
bif100945	CLAIM FILES
bif100946	CLAIM FILES
bif100947	CLAIM FILES
bif100948	CLAIM FILES
bif100949	CLAIM FILES
bif100950	CLAIM FILES
bif100951	CLAIM FILES
bif100952	CLAIM FILES
bif100953	CLAIM FILES
bif100954	CLAIM FILES
bif100955	CLAIM FILES
bif100956	CLAIM FILES
bif100957	CLAIM FILES
bif100959	CLAIM FILES
bif100960	CLAIM FILES
bif100961	CLAIM FILES
bif100962	CLAIM FILES
bif100964	CLAIM FILES
bif100965	CLAIM FILES
bif100966	CLAIM FILES
bif100967	CLAIM FILES
bif100968	CLAIM FILES
bif100969	CLAIM FILES
bif100970	CLAIM FILES
bif100971	CLAIM FILES
bif100972	CLAIM FILES
bif100973	CLAIM FILES
bif100974	CLAIM FILES
bif100975	CLAIM FILES

BoxID	Description
bif100976	CLAIM FILES
bif100977	CLAIM FILES
bif100978	CLAIM FILES
bif100979	CLAIM FILES
bif100981	CLAIM FILES
bif100982	CLAIM FILES
bif100984	CLAIM FILES
bif100988	CLAIM FILES
bif100989	CLAIM FILES
bif100991	CLAIM FILES
bif100992	CLAIM FILES
bif100993	CLAIM FILES
bif100994	CLAIM FILES
bif100997	CLAIM FILES
bif100999	CLAIM FILES
bif101001	CLAIM FILES
bif101002	CLAIM FILES
bif101003	CLAIM FILES
bif101004	CLAIM FILES
bif101005	CLAIM FILES
bif101006	CLAIM FILES
bif101007	CLAIM FILES
bif101009	CLAIM FILES
bif101010	CLAIM FILES
bif101011	CLAIM FILES
bif101012	CLAIM FILES
bif101013	CLAIM FILES
bif101014	CLAIM FILES
bif101015	CLAIM FILES
bif101016	CLAIM FILES
bif101017	CLAIM FILES
bif101018	CLAIM FILES
bif101019	CLAIM FILES
bif101020 bif101021	CLAIM FILES
bif101021	CLAIM FILES CLAIM FILES
bif101022	CLAIM FILES CLAIM FILES
bif101023	CLAIM FILES CLAIM FILES
bif101024	CLAIM FILES CLAIM FILES
bif101025	CLAIM FILES CLAIM FILES
bif101027	CLAIM FILES CLAIM FILES
bif101027	CLAIM FILES CLAIM FILES
bif101028	CLAIM FILES CLAIM FILES
bif101029	CLAIM FILES CLAIM FILES
bif101030	CLAIM FILES
bif101031	CLAIM FILES
5111010JZ	CE WALLIECO

BoxID	Description
bif101033	CLAIM FILES
bif101033	CLAIM FILES
bif101034	CLAIM FILES CLAIM FILES
bif101033	CLAIM FILES CLAIM FILES
bif101037	CLAIM FILES
bif101038 bif101039	CLAIM FILES
	CLAIM FILES
bif101040	CLAIM FILES
BIF101041	CLAIM FILES
bif101042	CLAIM FILES
bif101043	CLAIM FILES
bif101044	CLAIM FILES
bif101045	CLAIM FILES
bif101046	CLAIM FILES
bif101047	CLAIM FILES
bif101048	CLAIM FILES
bif101049	CLAIM FILES
bif101050	CLAIM FILES
BIF101051	CLAIM FILES
bif101052	CLAIM FILES
bif101053	CLAIM FILES
bif101054	CLAIM FILES
BIF101055	CLAIM FILES
bif101056	CLAIM FILES
BIF101057	CLAIM FILES
bif101058	CLAIM FILES
bif101059	CLAIM FILES
bif101060	CLAIM FILES
bif101061	CLAIM FILES
bif101062	CLAIM FILES
bif101063	CLAIM FILES
bif101064	CLAIM FILES
bif101065	CLAIM FILES
bif101066	CLAIM FILES
bif101067	CLAIM FILES
bif101069	CLAIM FILES
bif101070	CLAIM FILES
bif101071	CLAIM FILES
bif101072	CLAIM FILES
bif101073	CLAIM FILES
bif101074	CLAIM FILES
bif101075	CLAIM FILES
bif101076	CLAIM FILES
bif101077	CLAIM FILES
bif101078	CLAIM FILES
bif101079	CLAIM FILES
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BoxID	Description
bif101080	CLAIM FILES
bif101081	CLAIM FILES
bif101085	CLAIM FILES
bif101086	CLAIM FILES
bif101087	CLAIM FILES
bif101088	CLAIM FILES
bif101089	CLAIM FILES
bif101090	CLAIM FILES
BIF101230	CLAIM FILES
BIF101261	CLAIM FILES
BIF101262	CLAIM FILES
BIF101263	CLAIM FILES
BIF101264	CLAIM FILES
BIF101265	CLAIM FILES
BIF101266	CLAIM FILES
BIF101267	CLAIM FILES
BIF101268	CLAIM FILES
BIF101269	CLAIM FILES
BIF101270	CLAIM FILES
BIF101271	CLAIM FILES
BIF101272	CLAIM FILES
BIF101273	CLAIM FILES
BIF101277	CLAIM FILES
BIF101278	CLAIM FILES
BIF101279	CLAIM FILES
BIF101280	STATE FILINGS
BIF101281	CLAIM FILES
BIF101282	CLAIM FILES
BIF101284	CLAIM FILES
bif101412	CLAIM FILES
BIF101413	CLAIM FILES
BIF101415	CLAIM FILES
BIF101563	MISC. ACCOUNTING AND WORK PRODUCT
BIF101567	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101568	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101570	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101572	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101573	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101575	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101576	CLAIM FILES
BIF101582	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101585	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
BIF101588	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
DFW01958334	BOND FILES
DFW01958371	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
DFW01958462	BOND FILES

BoxID	Description
DFW01958466	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
DFW01958473	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
DFW01958475	BOND FILES
DFW01958476	MISC ACCOUNTING WORKPAPERS AND WORK PRODUCT
DFW01958480	POLICY FILES
DFW01958482	CLAIM FILES
DFW01958483	BOND FILES
DFW01958484	BOND FILES
DFW01958495	BOND FILES
DFW01958497	BOND FILES
DFW01958499	CLAIM FILES
DFW01958501	POLICY FILES
DFW01958506	BOND FILES
DFW01958507	POLICY FILES
DFW01958508	POLICY FILES
434875219	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
434875221	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
434875236	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213502	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213513	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213514	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213515	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213545	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213563	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213564	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213565	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213566	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213567	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213568	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213569	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213574	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213575 437213583	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213588	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage) ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213580	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213601	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213601	ACCOUNTING WORKE AFERS (Old files in Iron Mountain storage) ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213627	ACCOUNTING WORKE AFERS (Old files in Iron Mountain storage) ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213628	ACCOUNTING WORKE AFERS (Old files in Iron Mountain storage) ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213630	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213631	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213634	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213635	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213639	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
437213033	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213733	CLOSED CLAIMS (Old files in Iron Mountain storage)
13/213/71	CLOSED CLIMAS (Old files in non wodintain storage)

BoxID	Description
437213742	CLOSED CLAIMS (Old files in Iron Mountain storage)
437213743	CLOSED CLAIMS (Old files in Iron Mountain storage)
521132467	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
521132468	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
521132469	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
521132470	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696332	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696334	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696335	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696336	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696337	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696338	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696339	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696340	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696341	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696342	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696343	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696344	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696345	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696346	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696347	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696348	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696349	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696350	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696358	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696360	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696369	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696373	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696431	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696432	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696436	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696437	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696438	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696439	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696440	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696447	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696455	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696457	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696461	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696462	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696464	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696465	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696467	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696468	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696469	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696470	CLOSED CLAIMS (Old files in Iron Mountain storage)

BoxID	Description
PHL01696471	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696472	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696473	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696474	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696475	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696476	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696477	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696478	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696480	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696481	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696483	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696484	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696486	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696487	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696488	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696489	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696490	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696491	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696492	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696493	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696497	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696498	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696500	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696501	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696502	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696503	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696504	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696505	POLICY RECORDS (Old files in Iron Mountain storage)
PHL01696507	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696511	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696512	ACCOUNTING WORKPAPERS (Old files in Iron Mountain storage)
PHL01696514	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696515	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696520	CLOSED CLAIMS (Old files in Iron Mountain storage)
PHL01696521	CLOSED CLAIMS (Old files in Iron Mountain storage)
131123889	POLICY RECORDS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
131123896	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
131123911	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)

BoxID	Description
131123913	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
131123914	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
131123915	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
131123918	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
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	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
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	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
131123991	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
131123992	POLICY RECORDS (Old files in Iron Mountain storage)
131123993	POLICY RECORDS (Old files in Iron Mountain storage)
131123994	POLICY RECORDS (Old files in Iron Mountain storage)
131123995	POLICY RECORDS (Old files in Iron Mountain storage)
131123996	POLICY RECORDS (Old files in Iron Mountain storage)
131123997	POLICY RECORDS (Old files in Iron Mountain storage)
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	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
131124015	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
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	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
131124027	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
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131124048	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
131124049	POLICY RECORDS (Old files in Iron Mountain storage)
131124050	POLICY RECORDS (Old files in Iron Mountain storage)
131124051	POLICY RECORDS (Old files in Iron Mountain storage)
131124052	POLICY RECORDS (Old files in Iron Mountain storage)
131124053	POLICY RECORDS (Old files in Iron Mountain storage)
131124054	POLICY RECORDS (Old files in Iron Mountain storage)
131124055	POLICY RECORDS (Old files in Iron Mountain storage)
131124056	POLICY RECORDS (Old files in Iron Mountain storage)
131124057	POLICY RECORDS (Old files in Iron Mountain storage)
131124058	POLICY RECORDS (Old files in Iron Mountain storage)
131124059	POLICY RECORDS (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
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131124062	POLICY RECORDS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
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	CLOSED CLAIMS (Old files in Iron Mountain storage)
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	CLOSED CLAIMS (Old files in Iron Mountain storage)
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BoxID	Description
131124106	CLOSED CLAIMS (Old files in Iron Mountain storage)
131124107	CLOSED CLAIMS (Old files in Iron Mountain storage)
131124108	CLOSED CLAIMS (Old files in Iron Mountain storage)
131124109	CLOSED CLAIMS (Old files in Iron Mountain storage)
131124110	CLOSED CLAIMS (Old files in Iron Mountain storage)
131124111	CLOSED CLAIMS (Old files in Iron Mountain storage)
131124112	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
131124113	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
131124114	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
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172705680	POLICY RECORDS (Old files in Iron Mountain storage)
172705681	POLICY RECORDS (Old files in Iron Mountain storage)
172705682	POLICY RECORDS (Old files in Iron Mountain storage)
172705683	POLICY RECORDS (Old files in Iron Mountain storage)
172705684	POLICY RECORDS (Old files in Iron Mountain storage)
172705685	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
172705686	POLICY RECORDS (Old files in Iron Mountain storage)
172705688	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
172705689	POLICY RECORDS (Old files in Iron Mountain storage)
172705690	POLICY RECORDS (Old files in Iron Mountain storage)
172705691	POLICY RECORDS (Old files in Iron Mountain storage)
172705692	POLICY RECORDS (Old files in Iron Mountain storage)
172705693	POLICY RECORDS (Old files in Iron Mountain storage)
172705694	POLICY RECORDS (Old files in Iron Mountain storage)
172705695	POLICY RECORDS (Old files in Iron Mountain storage)
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BoxID	Description
172705736	POLICY RECORDS (Old files in Iron Mountain storage)
172705737	POLICY RECORDS (Old files in Iron Mountain storage)
172705738	POLICY RECORDS (Old files in Iron Mountain storage)
172705739	POLICY RECORDS (Old files in Iron Mountain storage)
172705740	POLICY RECORDS (Old files in Iron Mountain storage)
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172705786	POLICY RECORDS (Old files in Iron Mountain storage)
172705787	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
172705788	POLICY RECORDS (Old files in Iron Mountain storage)
172705789	POLICY RECORDS (Old files in Iron Mountain storage)
172705790	POLICY RECORDS (Old files in Iron Mountain storage)
172705791	POLICY RECORDS (Old files in Iron Mountain storage)
172705794	MIXED FILES 2007 (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
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	POLICY RECORDS (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
172705925	CLOSED CLAIMS (Old files in Iron Mountain storage)

BoxID	Description
172705926	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
172705927	POLICY RECORDS (Old files in Iron Mountain storage)
172705928	POLICY RECORDS (Old files in Iron Mountain storage)
172705929	POLICY RECORDS (Old files in Iron Mountain storage)
172705930	POLICY RECORDS (Old files in Iron Mountain storage)
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	POLICY RECORDS (Old files in Iron Mountain storage)
195845011	POLICY RECORDS (Old files in Iron Mountain storage)
195845012	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
195845013	POLICY RECORDS (Old files in Iron Mountain storage)
195845014	POLICY RECORDS (Old files in Iron Mountain storage)
195845015	POLICY RECORDS (Old files in Iron Mountain storage)
195845016	POLICY RECORDS (Old files in Iron Mountain storage)
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	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
195845046	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
195845047	CLOSED CLAIMS (Old files in Iron Mountain storage)
	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
195845052	CLOSED CLAIMS (Old files in Iron Mountain storage)
195845053	CLOSED CLAIMS (Old files in Iron Mountain storage)
195845054	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
195845055	CLOSED CLAIMS (Old files in Iron Mountain storage)
195845057	CLOSED CLAIMS (Old files in Iron Mountain storage)
195845059	CLOSED CLAIMS (Old files in Iron Mountain storage)
	POLICY RECORDS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
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	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
195845069	CLOSED CLAIMS (Old files in Iron Mountain storage)

BoxID	Description
195845070	CLOSED CLAIMS (Old files in Iron Mountain storage)
195845071	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
195845072	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
195845073	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
195845074	CLOSED CLAIMS (Old files in Iron Mountain storage)
	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
	CLOSED CLAIMS (Old files in Iron Mountain storage)
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274229619	POLICY RECORDS (Old files in Iron Mountain storage)
274229620	POLICY RECORDS (Old files in Iron Mountain storage)
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274229622	POLICY RECORDS (Old files in Iron Mountain storage)
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274229631	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
274229632	POLICY RECORDS (Old files in Iron Mountain storage)
274229633	POLICY RECORDS (Old files in Iron Mountain storage)
274229634	POLICY RECORDS (Old files in Iron Mountain storage)
274229636	CLOSED CLAIMS (Old files in Iron Mountain storage)
274229637	CLOSED CLAIMS (Old files in Iron Mountain storage)
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274229642	CLOSED CLAIMS (Old files in Iron Mountain storage)
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274229685	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
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274229687	POLICY RECORDS (Old files in Iron Mountain storage)
274229688	POLICY RECORDS (Old files in Iron Mountain storage)
274229689	POLICY RECORDS (Old files in Iron Mountain storage)
274229690	POLICY RECORDS (Old files in Iron Mountain storage)
274229691	POLICY RECORDS (Old files in Iron Mountain storage)
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274229737	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
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274229739	POLICY RECORDS (Old files in Iron Mountain storage)
274229740	POLICY RECORDS (Old files in Iron Mountain storage)
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BoxID	Description
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274229804	POLICY RECORDS (Old files in Iron Mountain storage)
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274229806	POLICY RECORDS (Old files in Iron Mountain storage)
274229807	POLICY RECORDS (Old files in Iron Mountain storage)
274229808	POLICY RECORDS (Old files in Iron Mountain storage)
274229809	POLICY RECORDS (Old files in Iron Mountain storage)
274229810	POLICY RECORDS (Old files in Iron Mountain storage)
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274229813	POLICY RECORDS (Old files in Iron Mountain storage)
274229814	POLICY RECORDS (Old files in Iron Mountain storage)
274229815	POLICY RECORDS (Old files in Iron Mountain storage)
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274229818	POLICY RECORDS (Old files in Iron Mountain storage)
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274229821	POLICY RECORDS (Old files in Iron Mountain storage)
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274229824	CLOSED CLAIMS (Old files in Iron Mountain storage)
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	CLOSED CLAIMS (Old files in Iron Mountain storage)
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	CLOSED CLAIMS (Old files in Iron Mountain storage)
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274229865	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)

BoxID	Description
274229866	CLOSED CLAIMS (Old files in Iron Mountain storage)
274229867	CLOSED CLAIMS (Old files in Iron Mountain storage)
274229868	CLOSED CLAIMS (Old files in Iron Mountain storage)
274229869	CLOSED CLAIMS (Old files in Iron Mountain storage)
274229870	CLOSED CLAIMS (Old files in Iron Mountain storage)
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	POLICY RECORDS (Old files in Iron Mountain storage)
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DFW01958031	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958057	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958058	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958059	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958068	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958072	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
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DFW01958077	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958125	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958126	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958142	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958161	POLICY RECORDS (Old files in Iron Mountain storage)

BoxID	Description
DFW01958179	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958189	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958194	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958207	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958209	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958287	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958288	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958290	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958319	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958321	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958323	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958324	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958325	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958328	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958329	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958330	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958331	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958332	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958333	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958335	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958336	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958337	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958338	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958339	CLOSED CLAIMS (Old files in Iron Mountain storage)
DFW01958340	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958341	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958343	CLOSED CLAIMS (Old files in Iron Mountain storage)
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DFW01958348	CLOSED CLAIMS (Old files in Iron Mountain storage)
DFW01958351	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958353	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
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DFW01958361	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
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DFW01958402	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958403	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)

BoxID	Description
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DFW01958410	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958411	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958415	BOND RECORDS AND BOND CLAIMS CLOSED (Old files in Iron Mountain storage)
DFW01958416	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958418	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958419	FINANCIAL WORKPAPERS (Old files in Iron Mountain storage)
DFW01958420	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958421	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958423	CLOSED CLAIMS (Old files in Iron Mountain storage)
DFW01958425	CLOSED CLAIMS (Old files in Iron Mountain storage)
DFW01958426	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958435	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958437	POLICY RECORDS (Old files in Iron Mountain storage)
DFW01958439	POLICY RECORDS (Old files in Iron Mountain storage)
BIF101240	MISC WORK PRODUCT
BIF101241	MISC ACCTG, WORK PRODUCT
BIF101243	CLOSED CLAIMS
BIF101244	CLOSED CLAIMS
BIF101246	MISC ACCTG, WORK PRODUCT
BIF101247	MISC ACCTG, WORK PRODUCT
BIF101231	CLOSED CLAIMS
BIF101232	CLOSED CLAIMS
BIF101233	CLOSED CLAIMS
BIF101234	CLOSED CLAIMS
BIF101235	CLOSED CLAIMS
BIF101237	CLOSED CLAIMS
BIF101779	CLOSED CLAIMS
BIF101780	CLOSED CLAIMS
BIF101781	CLOSED CLAIMS
BIF101782	CLOSED CLAIMS
BIF101783	CLOSED CLAIMS

EXHIBIT 11

NO. D-1-GV-12-001713

STATE OF TEXAS	§	IN THE DISTRICT COURT OF
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
GRAMERCY INSURANCE COMPANY	8	53RD JUDICIAL DISTRICT

AFFIDAVIT IN SUPPORT OF FINAL REPORT OF CLAIMS AND APPLICATION TO MAKE FINAL DISTRIBUTION AND DESTROY RECORDS

Came before me Ernesto Garza, who being duly sworn, did upon his oath attest:

- 1. "I am Ernesto Garza. I am over the age of eighteen years. I am competent to be a witness. I have personal knowledge of the facts to which I attest. I acquired my personal knowledge through my direct involvement and experience in the matters to which I attest. I am the President of Resolution Oversight Corporation (ROC), which is the Special Deputy Receiver (SDR) in these proceedings involving Gramercy Insurance Company (Gramercy). As a result of my duties for ROC, I have knowledge of the facts stated in this Affidavit, and they are all true and correct. I have read the *Final Report of Claims and Application to Make Final Distribution and Destroy Records* filed in the above referenced matter (Application). I have also read the Exhibits attached and incorporated into the Application by reference. I verify that all of the facts contained in the Application and this Affidavit are true and correct.
- 2. ROC has been Special Deputy Receiver of Gramercy since December 5, 2012, at all relevant times at issue in the Application. The staff of ROC and the subcontractors engaged on the receivership estate will be collectively referred to as "my staff" below. My staff made a diligent review of the receivership estate concerning the matters at issue in the Application and reported the status of all matters discussed in the Application and this Affidavit to me. All factual matters contained in this Affidavit were reported to me by a person on my staff with knowledge of the facts and in my capacity as President of ROC in the course of ROC's administration of the receivership estate. I have formed and acquired my knowledge from my review of records and resulting status reports from my staff.

EXHIBIT 11

- 3. I certify that all of the known claims against Gramercy were either determined by my staff or transferred to the Texas Property & Casualty Insurance Guaranty Association or a guaranty association in one of the following states: Alabama, Arizona, Arkansas, Colorado, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, North Carolina, North Dakota, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Virginia, Washington, West Virginia, Wisconsin and Wyoming. All known assets justifying the expense of collection have been collected for distribution, so it is in the best interests of this estate and its creditors to terminate the receivership.
- 4. Pursuant to Tex. Ins. Code § 443.017(b), I certify that the documents attached as Exhibits 1-10 to the Application are true and correct copies of documents created and/or maintained by the Special Deputy Receiver's office in the course of delinquency proceedings against Gramercy in Cause No. D-1-GV-12-001713; *State of Texas v. Gramercy Insurance Company*; In the 53rd Judicial District Court of Travis County, Texas and as such constitute *prima facie* proof of the matters asserted pursuant to Tex. Ins. Code § 443.017(c).
- 5. My staff and I have determined that the approval of the final report of claims, final distribution of assets, and the destruction of records as proposed in the Application are in the best interests of the Gramercy policyholders."
 Original signed by

Ernesto Garza, President of Resolution Oversight Corporation, as Special Deputy Receiver for Gramercy Insurance Company

Subscribed and sworn to before me on this 28th

_day of _March

2022.

Original signed by

MARY ELIZABETH MARTINEZ
My Notary ID # 131788163
Expires November 7, 2022

Notary Public - State of Texas