

EXAMINATION REPORT OF

LION INSURANCE COMPANY

NAIC Company Code: 11075

Holiday, Florida as of December 31, 2016

BY THE FLORIDA OFFICE OF INSURANCE REGULATION

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April 5, 2018

David Altmaier Commissioner Office of Insurance Regulation State of Florida Tallahassee, Florida 32399-0326

Dear Commissioner:

Pursuant to your instructions, in compliance with Section 624.316, Florida Statutes, Rule 690-138.005, Florida Administrative Code, and in accordance with the practices and procedures promulgated by the National Association of Insurance Commissioners ("NAIC"), we have conducted an examination as of December 31, 2016, of the financial condition and corporate affairs of

Lion Insurance Company 2739 US Highway 19 North Holiday, Florida 34691

hereinafter referred to as the "Company." Such report of examination is herewith respectfully submitted.

SCOPE OF EXAMINATION

This examination covered the period of January 1, 2012, through December 31, 2016, and commenced with planning at the Florida Office of Insurance Regulation ("Office") on October 18, 2017, to October 20, 2017. The fieldwork commenced on October 18, 2017, and concluded as of April 5, 2018. The Company's last full scope examination by representatives of the Office covered the period of January 1, 2007, through December 31, 2011.

The examination was a multi-state examination conducted in accordance with the NAIC Financial Condition Examiners Handbook ("Handbook"). The Handbook requires that the examination be planned and performed to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the Company, and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer's surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with Statements of Statutory Accounting Principles ("SSAP").

This examination report includes significant findings of fact, as mentioned in Section 624.319, Florida Statutes, and general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature (for example, subjective conclusions or proprietary information), are not included within the examination report but separately communicated to other regulators and/or the Company.

SUMMARY OF SIGNIFICANT FINDINGS

Current Examination Findings

The following is a summary of significant findings of fact (material adverse findings, significant non-compliance findings, such as non-compliance with state laws, SSAPs, annual financial statement instructions or material changes in the financial statements).

Enterprise Risk Report

The 2015 Enterprise Risk Report ("Form F") was filed on April 14, 2016. The Company was not in compliance with Section 628.801(2) Florida Statutes, which requires Form F to be filed on or before April 1.

Form B and Form C

The Company filed an incorrect Form B – Insurance Company Holding System Registration Statement ("Form B") for 2016, which did not comply with Rule 69O-143.406(3) and (4), Florida Administrative Code.

Form C – Summary of Changes to Registration Statement ("Form C") was filed on June 2, 2017. The Company was not in compliance with Rule 69O-143.406(3) and (4), Florida Administrative Code, which requires Form C to be filed on or before April 1.

Audited Financial Statement

The Company filed its 2013 Audited Financial Statement on June 6, 2014. The Company was not in compliance with Section 624.424(8)(a), Florida Statutes, which stipulates Audited Financial Statements are due on or before June 1.

Independent CPA/Awareness Letter

The Company did not file an Independent CPA/Awareness Letter for 2014 and 2015, and its 2016 Independent CPA/Awareness Letter was filed late on May 16, 2017. The Company was not in compliance with Rule 69O-137.002(6), Florida Administrative Code, which requires insurers to file an Independent CPA/Awareness Letter by December 31 of the years subject to audit.

Actuarial Opinion Summary

The Company submitted its 2013 Actuarial Opinion Summary to the Office on April 1, 2014. The Company was not in compliance with Section 624.424(1)(b)(2), Florida Statutes, which requires the Actuarial Opinion Summary to be filed by March 15.

Form and Rate Filings

The following Company's form and rate filings were not updated with the Office:

- 1. Standard Workers' Compensation Form Filing should be updated for content changes and the Florida Workers' Compensation Insurance Guaranty Association Assessment ("FWCIGA") surcharge.
- 2. Workers' Compensation Large Deductible Form Filing should be updated for content changes and FWCIGA surcharge.
- 3. Workers' Compensation Large Deductible Rate Filing should be updated for content changes.

The Company was not in compliance with Rule 69O-189.016(5)(d), Florida Administrative Code, which requires insurers to file proposed changes to previously approved filings.

Previous Examination Findings

There were no findings, exceptions or corrective action to be taken by the Company for the examination as of December 31, 2011.

COMPANY HISTORY

General

The Company was incorporated in Florida on June 17, 1986, and commenced business on June 26, 1986.

Dividends

The Company did not declare or pay dividends during the period under examination.

Capital Stock and Capital Contributions

As of December 31, 2016, the Company's capitalization was as follows:

Number of authorized common capital shares Number of shares issued and outstanding 2,000,000

1,600,000

Surplus Notes

The Company did not have any surplus notes during the period of this examination.

Acquisitions, Mergers, Disposals, Dissolutions

The Company had no acquisitions, mergers, disposals, or dissolutions during the period of this examination.

MANAGEMENT AND CONTROL

Corporate Governance

The annual shareholder meeting for the election of Directors was held in accordance with Section 628.231, Florida Statutes. The Directors serving as of December 31, 2016, are shown below:

Directors

| Name | City, State | Principal Occupation, Company Name |
|-----------------------------------|----------------------|---|
| John Anthony Porreca ¹ | Holiday, Florida | President & Treasurer, Lion Insurance Company |
| Robert Brandeis Bennett | Tampa, Florida | Attorney, Bennett, Jacobs & Adams, P.A. |
| Carol Ann Ostapchuk | Tallahassee, Florida | President/Owner, Carol A. Ostapchuk & Associates |
| Stephen Lowell Rohde | Boca Raton, Florida | Consultant, Heritage Insurance Holdings |
| Mary Ann Stiles | Tampa, Florida | Attorney, Quintarios, Prieto, Wood & Boyer, P.A. |

¹Chairperson

In accordance with the Company's Bylaws, the Board of Directors ("Board") appointed the following Senior Officers:

Senior Officers

| Name | City, State | Title |
|-----------------------|------------------|-----------------------|
| John Anthony Porreca | Holiday, Florida | President & Treasurer |
| Grant Louis Dalgleish | Holiday, Florida | Secretary |

The Company's Board appointed several internal committees. The following were the principal internal board committees and their members as of December 31, 2016:

Investment Committee

| Name | City, State | Title, Company Name |
|-----------------------------------|----------------------|---|
| John Anthony Porreca ¹ | Holiday, Florida | President & Treasurer, Lion Insurance Company |
| Carol Ann Ostapchuk | Tallahassee, Florida | President/Owner, Carol A. Ostapchuk & Associates |
| Stephen Lowell Rohde | Boca Raton, Florida | Consultant, Heritage Insurance Holdings |

¹Chairperson

The Company maintained an audit committee, as required by Section 624.424(8)(c), Florida Statutes.

Audit Committee

| Name | City, State | Title, Company Name |
|-----------------------------------|---------------------|--|
| Stephen Lowell Rohde ¹ | Boca Raton, Florida | Consultant, Heritage Insurance Holdings |

Carol Ann Ostapchuk Tallahassee, Florida President/Owner.

Carol A. Ostapchuk & Associates

Bruce Miller Cleveland, Ohio Controller,

South East Personnel Leasing, Inc.

¹Chairperson

Holding Company System

The 2015 Form F was filed on April 14, 2016. The Company was not in compliance with Section 628.801(2) Florida Statutes, which requires the Form F to be filed on or before April 1.

The Company filed an incorrect Form B for 2016, which did not comply with Rule 69O-143.406(3) and (4), Florida Administrative Code.

Form C was filed on June 2, 2017. The Company was not in compliance with Rule 690-143.406(3) and (4), Florida Administrative Code, which requires the Form C to be filed on or before April 1.

The following agreements were in effect between the Company and its affiliates:

Claims Services Agreement

The Company maintained a Claims Services Agreement with Packard Claims Administration, Inc. ("Packard"), effective January 1, 2006, which appointed Packard as it claims adjuster to service claims. The duties of Packard under the agreement included investigation, adjudication, and settlement of reported claims. Fees incurred under this agreement amounted to \$3,884,751 for 2016.

Brokering Agent Agreement

The Company maintained a Brokering Agent Agreement with Plymouth Insurance Agency, Inc. ("Plymouth"), effective September 1, 2009, whereby Plymouth is used primarily for brokering South East Personnel Leasing, Inc. ("SEPL"), a Professional Employer Organization ("PEO") business.

Expense Allocation Agreement

The Company entered into an Expense Allocation Agreement with SEPL, effective October 1, 2011, whereby SEPL agreed to provide the Company computer equipment, telephone equipment and computer software. The Company also agreed to manage the invested assets included in the Large Deductible Collateral Fund. Investment income allocated to SEPL was \$1,984,999 for 2016. Other expense charges amounted to \$54,000 for office rent and sundry items.

Client Leasing Agreement

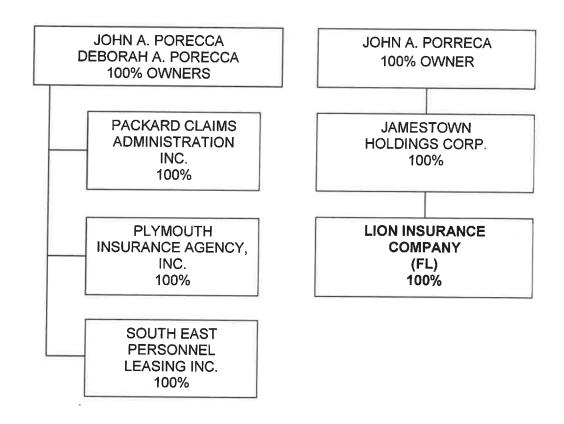
The Company maintained a Client Leasing Agreement with SEPL, effective April 30, 2003, and amended August 12, 2015, whereby SEPL agreed to provide leased employees to the Company. Fees incurred under this agreement for 2016 were \$2,748,595.

Workers Compensation Coverage

The Company provides workers' compensation insurance coverage to SEPL and its subsidiaries. The amount of premium paid to the Company by SEPL under this policy during 2016 was \$19,715,988.

Schedule Y of the Company's 2016 annual statement provided a list of all related companies of the holding company group. An organizational chart as of December 31, 2016, reflecting the holding company system, is shown on the following page.

Lion Insurance Company Organizational Chart December 31, 2016



ACCOUNTS AND RECORDS

The Company maintained its principal operational offices in Holiday, Florida.

The Company filed its 2013 Audited Financial Statement on June 6, 2014. The Company was not in compliance with Section 624.424(8)(a), Florida Statutes, which stipulates Audited Financial Statements are due on or before June 1.

The Company submitted its 2013 Actuarial Opinion Summary to the Office on April 1, 2014. The Company was not in compliance with Section 624.424(1)(b)(2), Florida Statutes, which requires the Actuarial Opinion Summary to be filed by March 15.

The following Company's form and rate filings were not updated with the Office:

- Standard Workers' Compensation Form Filing should be updated for content changes and the Florida Workers' Compensation Insurance Guaranty Association Assessment ("FWCIGA") surcharge.
- 2. Workers' Compensation Large Deductible Form Filing should be updated for content changes and FWCIGA surcharge.
- 3. Workers' Compensation Large Deductible Rate Filing should be updated for content changes.

The Company was not in compliance with Rule 69O-189.016(5)(d), Florida Administrative Code, which requires insurers to file proposed changes to previous approved filings.

The Company did not file an Independent CPA/Awareness Letter for 2014 and 2015, and its 2016 Independent CPA/Awareness Letter was filed late on May 16, 2017. The Company was not in compliance with Rule 69O-137.002(6), Florida Administrative Code, which requires insurers to file an Independent CPA/Awareness Letter by December 31 of the years subject to audit.

Corporate Records Review

The minutes of the Shareholders, Board and certain internal committees were reviewed for the period under examination. The minutes of the Board documented its meetings and approval of Company transactions and events, in compliance with the Handbook adopted by Rule 690-

138.001, Florida Administrative Code, including the authorization of investments, as required by Section 625.304, Florida Statutes.

Conflict of Interest

The Company adopted a policy statement requiring periodic disclosure of conflicts of interest in accordance with the Handbook adopted by Rule 69O-138.001, Florida Administrative Code. The Company and non-affiliates had the following agreements:

Custodial Agreement

The Company maintained a Custodial Agreement with U.S. National Bank executed on December 14, 2007, and amended on February 15, 2011. The agreement complied with Rule 69O-143.042, Florida Administrative Code.

Investment Management Agreement

On December 2013, the Company was party to an Investment Management Agreement with Wells Capital Management ("Wells"). Wells directs the purchase, sale, exchange and/or transfer of securities consistent with Lion's written investment guidelines.

Asset Management Agreement

The Company maintained an Asset Management Agreement with Conning Asset Management Company ("Conning") effective June 14, 2004. The agreement appointed Conning as the Company's investment manager to invest and reinvest the assets of the investment account and to perform investment advisory and portfolio management services. The agreement was amended September 27, 2011, to update the fee schedule and on December 24, 2013, to update certain paragraphs and fee schedules.

Security Fund Agreement

On January 1, 2013, the Company entered into a Security Fund Agreement with SunTrust Bank for liabilities arising from insurance business subject to the Quota Share Reinsurance Agreement dated January 1, 2013.

TERRITORY AND PLAN OF OPERATIONS

The Company was authorized to transact insurance in the following states and territories:

| Alabama | Arizona | Colorado |
|----------------|----------------|----------------------|
| Connecticut | Florida | Georgia |
| Hawaii | Illinois | Louisiana |
| Maryland | Massachusetts | Mississippi |
| Nevada | New Jersey | New Mexico |
| North Carolina | Oklahoma | Pennsylvania |
| Rhode Island | South Carolina | Tennessee |
| Texas | Virginia | District of Columbia |

The Company was authorized to transact insurance in Florida on December 1, 1992. The Company was acquired from Clarendon National Insurance Company by Jamestown Holding Corporation on April 29, 2003. The Company was authorized for Workers' Compensation coverage as of April 29, 2003. The Company's 2016 written premiums follow:

| Line of Business | Direct Business | Reinsurance Assumed | Reinsurance Ceded | Net Premiums Written |
|-----------------------|--------------------|------------------------|----------------------|----------------------------|
| Workers' Compensation | \$18,520,850 | \$12,000,426 | \$2,204,172 | \$28,317,105 |

Treatment of Policyholders

The Company established procedures for handling written complaints in accordance with Section 626.9541(1)(i)(3)(a), Florida Statutes. The Company maintained a claims procedure manual that included detailed procedures for handling each type of claim in accordance with Section 626.9541(1)(j), Florida Statutes.

REINSURANCE

The reinsurance agreements reviewed complied with NAIC standards with respect to the standard insolvency clause, arbitration clause, intermediary clause, transfer of risk, reporting and settlement information deadlines.

Reinsurance Assumed

The Company maintained two (2) assumed programs that were in effect during the examination period. The first program, the Tower program, was active from June 15, 2011, through December 31, 2012, and went into runoff thereafter. With the Tower program, the Company entered into a one hundred percent (100%) quota share reinsurance agreement with certain Tower Companies and CastlePoint National Insurance Company ("CastlePoint") and signed a "Trust Fund Agreement", as collateral for the business that was assumed.

<u>Subsequent Event</u>: During 2017, the Tower Companies were merged into CastlePoint and then CastlePoint was ordered into receivership by the Superior Court of the State of California, City and County of San Francisco. Since then, the Company has not made any attempts to recover the portion of the funds that exceeded the Company's collateral requirement.

The second program was a replacement program with State National Insurance Company acting as the front in certain states such as California and New York. This program also has trust funds in accordance with the "Security Fund Agreement" in place to provide collateral.

In addition, the Company assumed risk based on their participation in the National Workers' Compensation Reinsurance Pool that is administered by the National Council on Compensation Insurance, Inc.

Reinsurance Ceded

The Company ceded risk on a quota share and excess of loss basis to authorized and unauthorized reinsurers. The primary reinsurers were Safety National Casualty Corporation, Hannover Re., Arch Reinsurance, Aspen Insurance UK Limited, and Lloyd's Syndicates.

The Company had reinsurance recoverable balances with one unauthorized reinsurer—Markel Bermuda Limited. The Company received a letter of credit as collateral for the unauthorized amount.

INFORMATION TECHNOLOGY REPORT

Tyler Leach, CISA, CCSFP, IT Specialist, of Dixon Hughes Goodman LLP, performed an evaluation of the information technology and computer systems of the Company. Results of the evaluation were noted in the Information Technology Report provided to the Company.

STATUTORY DEPOSITS

The following securities were deposited with the State of Florida as required by Section 624.411, Florida Statutes, and with various state officials as required or permitted by law:

| State | Description | | Par Value | Market Value |
|--|--|---|--|--|
| FL FL | Cash Cash | | \$ 550,000 950,000 | \$ 550,000 950,000 |
| TOTAL FLORID Oth USL&H TOTAL ALL OT | A DEPOSITS US Treasury HER SP. DEPOSIT | 1.63% | \$ 1,500,000 \$ 501,866 \$ 2,001,866 | \$ 1,500,000 \$ 502,422 \$ 2,002,422 |
| DEPOSIT FOR POLICYHOLDE | BENEFITS OF ALL RS | | | |
| AZ CA GA NV MA NM NC VA | MM Funds US Treasury Treasury Mkt-Inst US Treasury US Treasury US Treasury US Treasury US Treasury | 0.40% 3.88% 0.18% 3.88% 3.88% 0.88% 3.88% | \$ 250,447 99,747 75,000 299,240 149,620 99,995 199,493 224,430 | \$ 250,001 103,891 75,000.0 311,672.0 155,836.0 100,047.0 207,781.0 233,754.0 |
| Total Deposits for Policyholders | or the Benefits of | | \$ 1,397,972 | \$ 1,437,982 |
| TOTAL SPECIAL | L DEPOSITS | - | \$ 3,399,838 | \$ 3,440,404 |

FINANCIAL STATEMENTS

The examination does not attest to the fair presentation of the financial statements included herein. If an adjustment is identified during course of the examination, the impact of such adjustment will be documented separately following the Company's financial statements. Financial statements, as reported and filed by the Company with the Office, are reflected on the following pages.

Lion Insurance Company Assets December 31, 2016

| | Per Company | Examination Adjustments | Per Examination |
|---|---------------|--|-----------------|
| Bonds | \$173,753,216 | | \$173,753,216 |
| Stocks: | | | |
| Common stocks | 4,240,361 | | 4,240,361 |
| Cash, cash equivalents and short-term investments | 61,993,151 | | 61,993,151 |
| Subtotals, cash and invested assets | 239,986,728 | | 239,986,728 |
| Investment income due and accrued | 1,420,325 | | 1,420,325 |
| Premiums and considerations: | | | |
| Uncollected premiums and agents' balances in the course of collection | 2,093,046 | | 2,093,046 |
| Deferred premiums and agents' balances and installments booked but deferred and not yet due | (1,197,949) | | (1,197,949) |
| Accrued retrospective premiums | 282 | | 282 |
| Reinsurance: | | | |
| Amounts recoverable from reinsurers | 8,076 | | 8,076 |
| Other amounts receivable under | | | • |
| reinsurance contracts | 1,769,024 | | 1,769,024 |
| Current federal and foreign income tax recoverable and interest thereon | 358,236 | | 358,236 |
| Guaranty funds receivable or on deposit | 228,161 | | 228,161 |
| Aggregate write-ins for other than invested assets | 8,847,015 | | 8,847,015 |
| Total | \$253,512,944 | ······································ | \$253,512,944 |
| _ | | | |

Lion Insurance Company Liabilities, Surplus and Other Funds December 31, 2016

| | Per Company | Examination Adjustments | Per Examination |
|---|---------------|----------------------------|-----------------|
| Losses | \$39,724,776 | | \$39,724,776 |
| Reinsurance payable on paid losses and loss adjustment expenses | 11,264 | | 11,264 |
| Loss adjustment expenses | 10,964,101 | | 10,964,101 |
| Commissions payable, contingent commissions and other similar charges | 4,481 | | 4,481 |
| Other expenses | 182,155 | | 182,155 |
| Taxes, licenses and fees | 1,079,842 | | 1,079,842 |
| Unearned premiums | 96,388 | | 96,388 |
| Ceded reinsurance premiums payable | 14,956 | | 14,956 |
| Payable to parent, subsidiaries and affiliates | 251,405 | | 251,405 |
| Payable for securities | 548,986 | | 548,986 |
| Aggregate write-ins for liabilities | 110,647,452 | | 110,647,452 |
| Total Liabilities | \$163,525,808 | | \$163,525,808 |
| Common capital stock | \$1,600,000 | | \$1,600,000 |
| Gross paid in and contributed surplus | 47,461,990 | | 47,461,990 |
| Unassigned funds (surplus) | 40,925,145 | | 40,925,145 |
| Surplus as regards policyholders | \$89,987,135 | | \$89,987,135 |
| TOTALS | \$253,512,944 | \$0_ | \$253,512,944 |

Lion Insurance Company

Statement of Income

December 31, 2016

Underwriting Income

| Premiums earned | \$28,238,601 |
|--|-----------------------|
| Deductions: | 420,200,001 |
| Losses incurred | \$6,769,129 |
| Loss expenses incurred | 4,808,993 |
| Other underwriting expenses incurred | 10,092,330 |
| Aggregate write-ins for underwriting deductions | 0 |
| Total underwriting deductions | \$21,670,453 |
| Net underwriting gain or (loss) | \$6,568,148 |
| Investment Income | |
| Net investment income earned | ** *** |
| Net realized capital gains or (losses) | \$2,157,452 |
| Net investment gain or (loss) | 222,775 |
| (A. C. | \$2,380,226 |
| Other Income | |
| Net gain or (loss) from agents' or premium balances charged off | (\$4.072\ |
| Finance and service charges not included in premiums | (\$4,073) |
| Aggregate write-ins for miscellaneous income | 0 |
| Total other income | (\$4,073) |
| | (φ4 ,073) |
| Net income before dividends to policyholders and | |
| before federal & foreign income taxes | \$8,944,302 |
| Dividends to policyholders | , ,,,,,,,, |
| Net Income, after dividends to policyholders, but | <u> </u> |
| before federal & foreign income taxes Federal & foreign income taxes | \$8,944,302 |
| r cachar a foreign income taxes | 2,681,464 |
| Net Income | \$6,262,838 |
| Capital and Surplus Account | |
| Surplus as regards policyholders, December 31 prior year | \$83,385,654 |
| Not Income | ,,, |
| Net Income | \$6,262,838 |
| Net unrealized capital gains or losses Change in non-admitted assets | 328,818 |
| Change in non-admitted assets Change in provision for reinsurance | 9,825 |
| Change in excess statutory over statement reserves | |
| Surplus adjustments: Paid in | 0 |
| Aggregate write-ins for gains and losses in surplus | 0 |
| Examination Adjustment | 0 |
| Change in surplus as regards policyholders for the year | \$6,601,481 |
| • | ΨΟ,ΟΟΤ,ΤΟΤ |
| Surplus as regards policyholders, December 31 current year | \$89,987,135 |

Lion Insurance Company Reconciliation of Capital and Surplus December 31, 2016

No adjustments were made to surplus as regards policyholders as a result of this examination.

| Surplus at December 31, 2011, per Examination | Increase | Decrease | \$64,621,946 |
|---|--------------|----------|--------------|
| | mior oddo | Deoreuse | |
| Net Income | \$24,834,909 | | \$24,834,909 |
| Change in net unrealized capital gain or (losses) | \$538,957 | | \$538,957 |
| Changed in non-admitted asset | | \$8,676 | \$8,676 |
| Net increase (or decrease) Surplus at December 31, | | | \$25,365,189 |
| 2016, per Examination | | | \$89,987,135 |

COMMENTS ON FINANCIAL STATEMENT ITEMS

Liabilities

Losses and Loss Adjustment Expenses

Actuarial Opinion Summaries are due on or before March 15. The Company submitted its 2013 Actuarial Opinion Summary on April 1, 2014. This late filing was not in compliance with Section 624.424(1)(b)(2), Florida Statutes.

Al J. Rhodes, ACAS, MAAA, of SIGMA Actuarial Consulting Group, Inc., appointed by the Board, rendered an opinion that the amounts carried in the balance sheet as of December 31, 2016, made a reasonable provision for all unpaid loss and loss expense obligations of the Company under the terms of its policies and agreements.

The Office's consulting actuary, Greg S. Wilson, FCAS, MAAA, Vice President, and Principal of Lewis & Ellis Actuaries & Consultants, reviewed the loss and loss adjustment expense workpapers provided by the Company and he was in concurrence with this opinion.

Capital and Surplus

The amount of capital and surplus reported by the Company of \$89,987,135, exceeded the minimum of \$16,144,398 required by Section 624.408, Florida Statutes.

SUMMARY OF RECOMMENDATIONS

Enterprise Risk Report

We recommend the Company file Form F on or before April 1 of each year in compliance with Section 628.801(2), Florida Statutes.

Form B and Form C

We recommend the Company file the required Form B (form OIR-DO-516) and Form C on or before the April 1 due date in compliance with Rule 69O-143.046(3) and (4), Florida Administrative Code.

Audited Financial Statement

We recommend that Audited Financial Statements be filed by the Company on or before June 1 for compliance with Section 624.424(8)(a), Florida Statutes.

Independent CPA/Awareness Letter

We recommend the Company file an Independent CPA/Awareness Letter by December 31 of the year subject to audit in accordance with Rule 69O-137.002(6)(a), Florida Administrative Code.

Actuarial Opinion Summary

We recommend the Actuarial Opinion Summary be filed on or before the March 15 due date to comply with Section 624.424(1)(b)(2), Florida Statutes.

Form and Rate Filings

We recommend the following Company's form and rate filings be updated with the Office to comply with Rule 69O-189.016, Florida Administrative Code:

1. Standard Workers' Compensation Form Filing should be updated for content changes and the Florida Workers' Compensation Insurance Guaranty Association Assessment ("FWCIGA") surcharge.

- 2. Workers' Compensation Large Deductible Form Filing should be updated for content changes and FWCIGA surcharge.
- 3. Workers' Compensation Large Deductible Rate Filing should be updated for content changes.

CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of Lion Insurance Company as of December 31, 2016, consistent with the insurance laws of the State of Florida.

Per examination of annual financial statements, the Company's surplus as regards policyholders was \$89,987,135, which exceeded the minimum of \$16,144,398 required by Section 624.408, Florida Statutes.

Participation in the examination included:

| Name | Title | Firm |
|--------------------------------------|------------------------|---------------------------|
| George Brown, CFE, CIA, MCM | Examiner-in-Charge | Dixon Hughes Goodman LLP |
| Roshi Fekrat, CPA, CFE, CIA, AMCM | Participating Examiner | Dixon Hughes Goodman LLP |
| Micah Rivera, CPA, CFE (Fraud) | Participating Examiner | Dixon Hughes Goodman LLP |
| Greg Wilson, FCAS, MAAA | Actuary | Lewis and Ellis Actuaries |
| Tyler Leach, CISA, CCSFP | IT Specialist | Dixon Hughes Goodman LLP |
| Name | Title | State of Florida |
| Jeffrey Rockwell, MBA, FCCM | Examination Manager | Office |
| Paula Bowyer, APIR | Participating Examiner | Office |

Participating Examiner

Respectfully submitted,

Brian Sewell, CFE, MCM

Chief Examiner

Florida Office of Insurance Regulation