

## OF EXAMINATION REPORT

# UNIVERSAL INSURANCE COMPANY OF NORTH AMERICA

NAIC Company Code: 11986

Sarasota, Florida as of December 31, 2017

BY THE
FLORIDA
OFFICE OF INSURANCE REGULATION

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November 30, 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, 2017, of the financial condition and corporate affairs of

### Universal Insurance Company of North America

101 Paramount Drive, Suite 220 Sarasota, Florida 34232

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, 2013 through December 31, 2017 and commenced with planning at the Florida Office of Insurance Regulation ("Office") on May 30, 2018 to June 1, 2018. The fieldwork commenced on May 30, 2018, and concluded as of November 30, 2018. The Company's last full scope examination by representatives of the Office covered the period of January 1, 2008 through December 31, 2012.

The examination was for an individual insurer licensed in multiple states and was conducted in accordance with the 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. No other states actively participated in this exam.

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 or material changes in the financial statements).

### Management and Control

The Company had various changes in officers and directors that occurred throughout the examination period. Notices were not consistently provided to the Office on a timely basis. See details below:

Officer/Director	Date Appointed	Date of OIR Notification
Gadiel Jose Cardona Nater	September 9, 2014	March 3, 2015
Gretchen Lynn Hopkins	April 30, 2015	September 2, 2015
Richard John Urra	September 29, 2015	December 22, 2015
Osvaldo Lorenzo Miranda	November 2, 2015	December 22, 2015

The Company was not in compliance with Section 628.261, Florida Statutes.

### Reinsurance Ceded

The letters of credit from assuming companies associated with the ceded reinsurance program, did not contain the following provisions as required by Rule 69O-144.005(6), Florida Administrative Code:

- SCOR Global P&C (Reference #30905173), SCOR Switzerland Ltd. (Reference #31915009), Hiscox Insurance Company (Bermuda), and XL Bermuda Re Ltd. letters of credit were missing an "evergreen clause" that prevents the expiration of the letter of credit with no less than sixty (60) days' notice prior to the expiration, in accordance with Rule 69O-144.005(6)(d)(1-2), Florida Administrative Code.
- Argo Re Ltd., Catlin Insurance Company Ltd., Catlin Re Switzerland Ltd., General Insurance Corporation of India, SCOR Switzerland Ltd. (Reference #31915009), and XL Bermuda Re Ltd. letters of credit did not state they were subject to and governed

by the laws of the state of Florida, in accordance with Rule 69O-144.005(6)(e)(1),

Florida Administrative Code.

**Previous Examination Findings** 

The following is an update on other significant regulatory information disclosed in the previous

examination:

Management and Control

The Company had various changes in officers and directors that occurred throughout the

examination period. Notices were not consistently provided to the Office on a timely basis. The

Company was not in compliance with Section 628.261, Florida Statutes.

Resolution: This finding is unresolved.

**Custody Agreements** 

The Company's custodial agreement with Salem Trust was not in compliance with Rule 690-

143.042, Florida Administrative Code.

Resolution: This finding has been resolved. The Company no longer uses Salem Trust as its

custodian.

**COMPANY HISTORY** 

General

The Company was incorporated in Florida on April 23, 2004 and commenced business on May

19, 2004.

The Company was authorized to transact the following insurance coverage in Florida as of

December 31, 2017:

Fire

Allied Lines

Commercial Multi-Peril

Homeowners Multi-Peril

Inland Marine

Other Liability

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### **Dividends**

In accordance with Section 628.371, Florida Statutes, the Company declared and paid dividends to its stockholder in 2015 in the amount of \$3,500,000.

### **Capital Stock and Capital Contributions**

As of December 31, 2017, the Company's capitalization was as follows:

Number of authorized common capital shares	25,000
Number of shares issued and outstanding	25,000
Total common capital stock	\$2,500,000
Par value per share	\$100.00

### **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. Directors serving as of December 31, 2017, are shown below:

### **Directors**

Name	City, State	Principal Occupation, Company Name
Monique Miranda Merle	Dorado, Puerto Rico	Chairperson, Universal Insurance Company of North America (UICNA)

Jose Medina Cardona	Dorado, Puerto Rico	President, Point Guard Insurance Company
Waldemar Fabery-Villaspesa	Carolina, Puerto Rico	Special Counsel, Toro Colon Mullet PSC
Josely Vega Maldonado	Dorado, Puerto Rico	President, Universal Insurance Company of Puerto Rico (UICPR)
Jorge Julio Amadeo, Jr.	Guaynabo, Puerto Rico	Retired
Agustin Gutierrez Aja	Mexico City, Mexico	Retired

In accordance with the Company's Bylaws, the Board appointed the following Senior Officers:

### **Senior Officers**

Name	City, State	Title
Miguel Angel Barrales	Sarasota, Florida	President
Monique Miranda Merle	Dorado, Puerto Rico	Chief Executive Officer
Roberto Javier Martinez	Trujillo Alto, Puerto Rico	Treasurer
Josely Vega Maldonado	Dorado, Puerto Rico	Secretary
Katherine Allison Moore	Sarasota, Florida	Vice President
Gretchen Lynn Hopkins	Sarasota, Florida	Vice President
Osvaldo Lorenzo Miranda	Sarasota, Florida	Vice President
Gadiel Jose Cardona Nater	Sarasota, Florida	Vice President
James Robert Watje (a)	Sarasota, Florida	Vice President
Richard John Urra	Sarasota, Florida	Vice President

<sup>(</sup>a) Resigned on May 11, 2018.

The Company had changes in officers and directors that occurred throughout the examination period. Notices were not consistently provided to the Office on a timely basis. See details below.

Officer/Director	Date Appointed	Date of OIR Notification
Gadiel Jose Cardona Nater	September 9, 2014	March 3, 2015
Gretchen Lynn Hopkins	April 30, 2015	September 2, 2015

Richard John Urra	September 29, 2015	December 22, 2015
Osvaldo Lorenzo Miranda	November 2, 2015	December 22, 2015

The Company was not in compliance with Section 628.261, Florida Statutes.

The Company's Board appointed several internal committees. The following were the principal internal Board committees and their members as of December 31, 2017.

### **Executive Committee**

Name	City, State	Title, Company Name
Miguel Angel Barrales (1)	Sarasota, Florida	President, UICNA
Katherine Allison Moore	Sarasota, Florida	Vice President, UICNA
Richard John Urra	Sarasota, Florida	Vice President, UICNA
Eduardo Miranda	Sarasota, Florida	Executive Aide to the President, UICNA
James Robert Watje	Sarasota, Florida	Vice President, UICNA
Osvaldo Lorenzo Miranda	Sarasota, Florida	Vice President, UICNA
Emmy Greer Parada	Sarasota, Florida	Assistant Vice President, UICNA
Alan Edward Lange	Sarasota, Florida	Assistant Vice President, UICNA
Gadiel Jose Cardona Nater	Sarasota, Florida	Vice President, UICNA
Gretchen Lynn Hopkins	Sarasota, Florida	Vice President, UICNA
(1) 01 :		

<sup>(1)</sup> Chairperson

### **Investment Committee**

Name	City, State	Title, Company Name
Monique Miranda Merle (1)	Dorado, Puerto Rico	Chief Executive Officer, UICNA
Josely Vega Maldonado	Dorado, Puerto Rico	President, UICPR
Roberto Javier Martinez	Trujillo Alto, Puerto Rico	Treasurer, UICNA
Miguel Angel Barrales	Sarasota, Florida	President, UICNA
Maritere Jimenez	San Juan, Puerto Rico	Treasurer, Universal Insurance Co.
Raul Ramirez	San Juan, Puerto Rico	Director, Universal Insurance Co.
Jose Carlos Benitez	San Juan, Puerto Rico	President, Universal Life Insurance Co.
Linda Viera Orengo	San Juan, Puerto Rico	Vice President, Universal Insurance Co.

<sup>(1)</sup> Chairperson

The Board of Universal Insurance Holdings of North America, Inc. ("Universal Holdings") appointed an audit committee, as required by Section 624.424(8)(c), Florida Statutes.

### **Audit Committee**

Name	City, State	Title, Company Name
Monique Miranda Merle	Dorado, Puerto Rico	Chief Executive Officer, UICNA
Josely Vega Maldonado	Dorado, Puerto Rico	President, UICPR
Waldemar Fabery - Villaspesa <sup>(1)</sup>	Carolina, Puerto Rico	Director, UICNA

<sup>(1)</sup> Chairperson

### **Holding Company System**

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

### **Tax Sharing Agreement**

The Company entered into a Tax Sharing Agreement on March 31, 2005, with Universal Holdings, Universal North America Insurance Company ("UNAIC"), and Universal Insurance Managers ("UIM"). This agreement was amended August 1, 2005, October 16, 2007, June 30, 2009, July 1, 2011, December 31, 2014, and October 28, 2016. The Company files a consolidated federal income tax return, whereby the allocation among the companies was made primarily on a separate return basis with current benefit for any net operating losses or other items utilized in the consolidated return.

### **Executive Management Services Agreement**

The Company entered into an Executive Management Services Agreement on July 19, 2010, with Universal Holdings. Under the agreement Universal Holdings will perform the following for the Company: 1) house and maintain the corporate books and records, 2) retain auditors for the audited financial statements, 3) make certain facilities available, 4) provide investment management services or direct others, 5) perform such other services as may become necessary. Universal Holdings received no compensation for the services provided.

### Managing General Agency and Claims Administration Agreement

The Company entered into an Amended and Restated Managing General Agency and Claims Administration Agreement on August 11, 2016, with UIM. Under the agreement UIM will issue and administer policies pursuant to the underwriting guidelines, rates, policy forms, directives, bulletins, and other standards and guidelines of the Company. As consideration for policy issuance and administration services, the Company paid UIM Section 624.4213, Florida Statutes of total written premiums. In addition, the agreement granted UIM authority to fully investigate, evaluate, handle, adjust and settle each claim which may arise during the term of the agreement. As consideration for these claims services, the Company paid UIM Section 624.4213, Florida Statutes of the Company's total earned premium. Fees incurred under this agreement during 2017 amounted to \$32,145,892.

### ACCOUNTS AND RECORDS

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

The Company and non-affiliates had the following agreements:

### Custodial Agreement

The Company maintained a custodial agreement with Bank of America, NA executed on October 1, 2015, and U.S. Bank, NA executed on August 14, 2009. Both agreements complied with Rule 69O-143.042, Florida Administrative Code.

### **Managing General Agent Agreement**

The Company utilized a non-affiliated managing general agent (MGA), Arrowhead General Insurance Agency, Inc. (Arrowhead) to produce insurance business in the states of Texas, North Carolina and South Carolina. Arrowhead was responsible for quoting policies to customers, and billing and collecting premiums on behalf of the Company. The Company retained the right for binding authority and ensures all policies meet Company underwriting guidelines. Arrowhead's affiliate, American Claims Management, Inc., provided claims administration services to the Company.

### Independent Auditor Agreement

The Company's statutory basis financial statements were audited by the following independent CPA firms: Deloitte & Touche, LLP for the year 2013, KPMG, LLP for the years 2014, 2015, and 2016, and Ernst & Young, LLP for the year 2017, in accordance with Section 624.424(8), Florida Statutes. Supporting work papers were prepared by the CPA firm as required by Rule 690-137.002, Florida Administrative Code.

### Corporate Records Review

The recorded minutes of the Shareholder(s), Board of Directors (Board) and certain internal committees were reviewed for the period under examination. The recorded minutes of the Board documented its meetings and approval of Company transactions and events, in compliance with

the Handbook adopted by Rule 69O-138.001, Florida Administrative Code, including the authorization of investments, as required by Section 625.304, Florida Statutes.

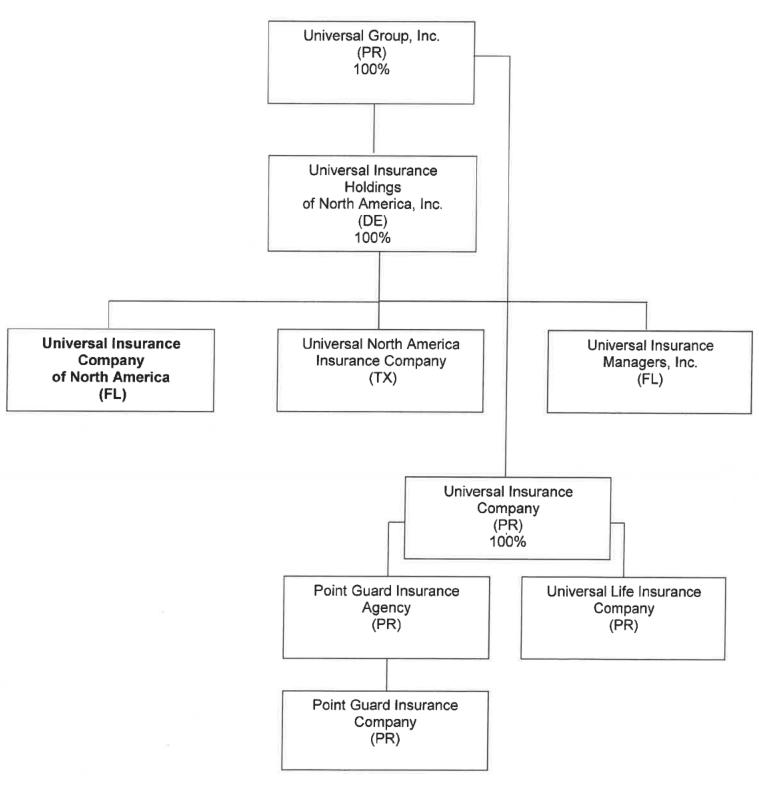
### Conflict of Interest

The Company adopted a policy statement requiring periodic disclosure of conflicts of interest in accordance with the Handbook as adopted by Rule 69O-138.001, Florida Administrative Code.

Schedule Y of the Company's 2017 annual statement provided a list of all related companies of the holding company group.

A simplified organizational chart as of December 31, 2017, reflecting the holding company system, is shown on the following page.

## Universal Insurance Company of North America Simplified Organizational Chart December 31, 2017



### TERRITORY AND PLAN OF OPERATIONS

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

Florida

North Carolina

South Carolina

Texas

The Company was authorized to transact insurance in Florida on May 19, 2004, and is currently authorized for the following coverage(s) as of December 31, 2017:

Fire

Homeowners Multi-Peril

Inland Marine

Allied Lines

Commercial Multi-Peril

Other Liability

### **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

During 2013 and 2014, the Company assumed policies from Citizens Property Insurance Corporation through the depopulation program pursuant to Section 627.351(6)(q)(3), Fiorida Statutes.

### Reinsurance Ceded

The Company's reinsurance program consisted of quota share and excess of loss reinsurance agreements for per risk, catastrophic and non-catastrophic events at December 31, 2017. The Company had various quota share contracts in place on a state specific basis due to the risk profiles within those applicable states. The Company also had a net quota share agreement in place for all business not covered by the other applicable state contracts or their property excess per risk and excess of loss treaties.

The structure of the program contained various contracts that would only apply in the event the other insurance contracts were exhausted. The per risk excess of loss and Florida Hurricane Catastrophe Fund (FHCF) treaties were triggered first and inured to the benefit of state specific quota share agreements, all of which further inured to the benefit of the catastrophe excess of loss program in place. The net quota share agreement overarched these treaties and was applicable to business not covered by the aforementioned treaties, and/or losses exceeding the occurrence/aggregate limits.

A review of the letter of credits from the assuming companies associated with the ceded reinsurance, identified the following deficiencies:

- SCOR Global P&C (Reference #30905173), SCOR Switzerland Ltd. (Reference #31915009), Hiscox Insurance Company (Bermuda), and XL Bermuda Re Ltd. letters of credit were missing an "evergreen clause" that prevents the expiration of the letter of credit with no less than sixty (60) days' notice prior to the expiration, in accordance with Rule 69O-144.005(6)(d)(1-2), Florida Administrative Code.
- Argo Re Ltd., Catlin Insurance Company Ltd., Catlin Re Switzerland Ltd., General Insurance Corporation of India, SCOR Switzerland Ltd. (Reference #31915009), and XL Bermuda Re Ltd. letters of credit did not state they were subject to and governed by the laws of the state of Florida, in accordance with Rule 69O-144.005(6)(e)(1), Florida Administrative Code.

### INFORMATION TECHNOLOGY REPORT

Jenny Jeffers, AES, CISA, CFE (Fraud) and Joanna J. Latham, CPA, CFE, AES, CISA, CRISC, of Jennan Enterprises, LLC, 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	Ma	rket Value
FL TOTAL FLORIDA DE	Cash POSITS	: :	\$	300,000 300,000	\$	300,000
NC SC TOTAL OTHER DEPO	WAKE CNTY NC US TREASURY DSITS	1.530% 1.031% <sub>_</sub>	\$	300,000 125,000 425,000	\$	311,995 124,976 436,971
TOTAL SPECIAL DEF	POSITS	=	\$	725,000	\$	736,971

### FINANCIAL STATEMENTS

The examination does not attest to the fair presentation of the financial statements included herein. If an adjustment is identified during the 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.

## Universal Insurance Company of North America Assets

### December 31, 2017

	Per Company	Examination Adjustments	Per Examination
Bonds	\$57,351,650		\$57,351,650
Cash, cash equivalents and short-term investments	11,438,369		11,438,369
Agents' Balances: Uncollected premium Deferred premium	6,965,238 2,420,978		6,965,238 2,420,978
Reinsurance recoverable	27,492,928		27,492,928
Investment income due & accrued	485,649		485,649
Current federal and foreign income tax recoverable	130,156		130,156
Net deferred tax asset	3,214,041		3,214,041
Receivable from parents, subsidiaries and affiliates			
	5,100,597		5,100,597
Aggregate write-in for			
other than invested assets	2,051,628		2,051,628
Totals	\$116,651,234	\$0	<u>\$116,651,234</u>

## Universal Insurance Company of North America Liabilities, Surplus and Other Funds December 31, 2017

	Per Company	Examination Adjustments	Per Examination
Losses	\$20,457,193		\$20,457,193
Loss adjustment expenses	1,962,407		1,962,407
Commissions payable	1,130,985		1,130,985
Other expenses	396,217		396,217
Taxes, licenses and fees	939,076		939,076
Unearned premium	23,708,149		23,708,149
Advance premiums	1,554,789		1,554,789
Ceded reinsurance premiums payable	19,327,101		19,327,101
Funds held by Company under reinsuranc treaties	e 10,860,630		10,860,630
Remittances and items not allocated	231,901		231,901
Drafts outstanding	1,425,582		1,425,582
Aggregate write-ins for liabilities	67,086		67,086
Total Liabilities	\$82,061,116	\$0	\$82,061,116
Common capital stock	\$2,500,000		\$2,500,000
Gross paid in and contributed surplus	42,761,512		42,761,512
Unassigned funds (surplus)	(10,671,394)		(10,671,394)
Surplus as regards policyholders	\$34,590,118	\$0	\$34,590,118
Total liabilities, surplus and other funds	\$116,651,234	\$0	\$116,651,234

### Universal Insurance Company of North America

### Statement of Income

### December 31, 2017

### **Underwriting Income**

Premiums earned	\$62,476,155
Deductions:  Losses incurred  Loss expenses incurred  Other underwriting expenses incurred  Total underwriting deductions	\$39,664,534 11,200,174 16,508,027 \$67,372,735
Net underwriting gain or (loss)	(\$4,896,580)
Investment Income	
Net investment income earned Net realized capital gains or (losses) Net investment gain or (loss)	\$1,727,252 411,723 \$2,138,975
Other Income	
Net gain or (loss) from agents' or premium balances charged off Finance and service charges not included in premiums Total other income	(\$29,987) 193,905 \$163,918
Net income before dividends to policyholders and before federal & foreign income taxes  Net Income, after dividends to policyholders, but before federal & foreign income taxes  Federal & foreign income taxes	(\$2,593,687) (\$2,593,687) (503,723)
Net Income	(\$2,089,964)
Capital and Surplus Account	
Surplus as regards policyholders, December 31 prior year	\$32,736,073
Net Income Change in net deferred income tax Change in non-admitted assets Surplus adjustments: Paid in Change in surplus as regards policyholders for the year	(\$2,089,964) (1,314,129) 258,138 5,000,000 \$1,854,045
Surplus as regards policyholders, December 31 current year	\$34,590,118

## Universal Insurance Company of North America Reconciliation of Capital and Surplus December 31, 2017

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

## Capital/Surplus Change during Examination Period

Surplus at December	31,	2012, per
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Examination			\$34,701,074
	Increase	<u>Decrease</u>	<b>40</b> 1,1 <b>0</b> 1, <b>0</b> 1
Net Income (loss)	,	(\$4,319,332)	
Change in net unrealized capital gain (loss)		(\$351,895)	
Change in net deferred income tax		(\$3,296,801)	
Change in non-admitted assets	\$1,811,972		
Change in paid in surplus	\$9,545,100		
Dividends to stockholders		(\$3,500,000)	
Net increase (or decrease)			<u>(\$110,956)</u>
Surplus at December 31, 2017, per			
Examination			\$34,590,118

### **COMMENTS ON FINANCIAL STATEMENT ITEMS**

### Liabilities

### **Losses and Loss Adjustment Expenses**

Alejandra Nolibos, FCAS, MAAA, associated with Willis Towers Watson, appointed by the Board, rendered an opinion that the amounts carried in the balance sheet as of December 31, 2017, 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 consulting actuary, Gustave A. Krause, FCAS, MAAA, FCA of Actuaries, Inc., reviewed the loss and loss adjustment expense work papers 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 \$34,590,118, exceeded the minimum of \$10,000,000 required by Section 624.408, Florida Statutes.

### **SUMMARY OF RECOMMENDATIONS**

### **Management and Control**

We recommend that the Company comply with Section 628.261, Florida Statutes and provide timely notice of all changes to officers and/or directors within forty-five (45) days to the Office.

### Reinsurance Ceded

We recommend the Company amend the letters of credit from assuming reinsurance companies associated with the ceded reinsurance program, to ensure they contain all provisions required by Rule 690-144.005(6), Florida Administrative Code.

### CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of **Universal Insurance Company of North America** as of December 31, 2017, consistent with the insurance laws of the State of Florida.

Per the examination annual financial statements, the Company's surplus as regards policyholders was \$34,590,118, which exceeded the minimum of \$10,000,000 required by Section 624.408, Florida Statutes.

In addition to the undersigned, the following also participated in the examination:

F. Laurence Lindberg, CFE, CPA	Examiner-in-Charge	EWM Group, PC
Thomas Mayberry, CFE, CPA	Participating Examiner	EWM Group, PC
Paul Sliwinski, CPA, ARe	Participating Examiner	EWM Group, PC
Chris Davis, CPA,	Participating Examiner	EWM Group, PC
Jenny L. Jeffers, CISA, AES, CFE (Fraud)	IT Specialists	Jennan Enterprises, LLC
Joanna J. Latham, CPA, CFE, AES, CISA,	IT Specialists	Jennan Enterprises, LLC
CRISC		
Anthony Pipia, ACAS, MAAA	Actuarial Specialists	Actuaries, Inc.
Gustave Krause, FCAS, MAAA, FCA,	Actuarial Specialists	Actuaries, Inc.
Marie Stuhlmuller	Exam Manager	Office
Christopher Brown	Participating Examiner	Office

Respectfully submitted,

Brian Sewell, CFE, MCM

Chief Examiner

Florida Office of Insurance Regulation