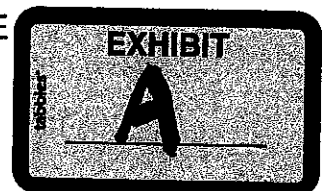


REPORT ON EXAMINATION  
OF THE  
PLATEAU CASUALTY INSURANCE COMPANY

2701 NORTH MAIN STREET  
CROSSVILLE, TENNESSEE 38555

AS OF  
DECEMBER 31, 2009

THE DEPARTMENT OF COMMERCE AND INSURANCE  
STATE OF TENNESSEE  
NASHVILLE, TENNESSEE



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Dept. of Commerce & Insurance  
Company Examinations

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Crossville, Tennessee  
May 6, 2011

Honorable Joseph Torti, III  
Chair, NAIC Financial Condition (E) Committee  
Rhode Island Department of Business Regulation  
Division of Insurance  
1511 Pontiac Ave., Bldg. 69-2  
Cranston, Rhode Island 02920

Honorable Sharon P. Clark  
Secretary, Southeastern Zone, NAIC  
Kentucky Department of Insurance  
P.O. Box 517  
Frankfort, Kentucky 40602

Honorable Julie Mix McPeak  
Commissioner of Commerce and Insurance  
State of Tennessee  
500 James Robertson Parkway  
Nashville, Tennessee 37243

Dear Commissioners:

Pursuant to your instructions and in accordance with the Tennessee Insurance Laws, regulations, and resolutions adopted by the National Association of Insurance Commissioners (NAIC), a financial examination and market conduct review has been made concerning the condition and affairs of the

**PLATEAU CASUALTY INSURANCE COMPANY  
CROSSVILLE, TENNESSEE**

hereinafter generally referred to as "PCIC" or the "Company", and a report thereon is submitted as follows:

## INTRODUCTION

This examination was called on January 14, 2011 through the Examination Tracking System of the NAIC by the Department of Commerce and Insurance of the State of Tennessee (TDCI). The examination was performed under the association plan of the NAIC by examiners from the TDCI representing the Southeastern Zone of the NAIC. There was no participation from any other zones. The examination commenced on January 24, 2011 and was conducted at the Company's home office at 2701 North Main Street, Crossville, Tennessee, where all books and records are located. The examination was performed simultaneously with the examination of the Company's subsidiary, Plateau Insurance Company (PIC).

## SCOPE OF EXAMINATION

The period covered by this examination is from January 1, 2005, to the close of business on December 31, 2009, and includes any material transactions and/or events occurring subsequent to the examination date and noted during the course of the examination.

We conducted our examination in accordance with the NAIC Financial Condition Examiners Handbook. We planned and performed the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company, including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. The examination also included assessing the principles used and significant estimates made by management, as well as

evaluating the overall financial statement presentation and management's compliance with Statutory Accounting Principles and annual statement instructions. All accounts and activities of the Company were considered in accordance with the risk-focused examination process. Independent actuaries were used in the review of the Company's reserves.

The previous examination was made as of December 31, 2004, and resulted in a \$1,204,069 net decrease in surplus. An adjustment in assets of (\$1,101,069) was made resulting from a bond (including accrued interest) that was not maintained under a proper custodial agreement. An adjustment of \$103,000 was made to increase the liability for unauthorized reinsurance. Further, the Company was issued the following directives:

1. comply with Tenn. Code Ann. § 56-11-206(a)(2) by notifying the Commissioner in writing of its intention to enter into any transactions listed under § 56-11-206(a)(2)(C) at least thirty (30) days prior to doing so, so as to allow the Commissioner to review such transactions and determine whether or not to disapprove them;
2. comply with Tenn. Code Ann. § 56-1-501(b) by completing its annual statement in accordance with the annual statement instructions established by the Commissioner. This compliance includes, but is not limited to, properly establishing as a liability for unauthorized reinsurance those amounts of reinsurance recoverables not covered by trust agreements;
3. comply with Tenn. Code Ann. § 56-3-112 and Tenn. Comp. R. & Regs., ch. 0780-1-46-.04 (1999) by maintaining a custodial agreement that complies with said rule, should the Company choose an authorized method of holding its securities that requires such an agreement.

As of the date of this examination, the Company has complied with these directives.

Note: Part 2, §§ 56-11-201 through 56-11-215, was redesignated as Part 1, §§ 56-11-101 through 56-11-115, by the code commission in 2008.

### COMPANY HISTORY

The Company was organized under the laws of the State of Tennessee on December 28, 1995. Effective May 29, 1997, the Company was issued a Certificate of Authority by the TDCI to transact the business of property and casualty insurance.

Provision was made in the original charter for authorized capital of \$1,250,000 consisting of 1,250 shares of common stock with a par value of \$1,000 per share. On May 1, 1997, the Company issued 1,000 shares of its common stock to Plateau Group, Inc. (PGI); in consideration of the payment by PGI of \$3,000 per share. Thus, the Company's capitalization consisted of \$1,000,000 in common capital stock and \$2,000,000 in gross paid in and contributed surplus

On March 1, 2001, PGI contributed the common voting stock of the Company to Plateau Insurance Company (PIC). The stock, 1,000 shares of \$1,000 par value per share, was contributed at its statutory value at that time of \$3,671,593. Control of the Company did not change as a result of this transaction since the ultimate controlling party for both companies remained PGI. The accounting recognition of the transaction was made in accordance with the NAIC Accounting Practices and Procedures Manual, Statements of Statutory Accounting Principals (SSAP). In addition, no approval from the Tennessee Department of Commerce and Insurance

(TDCI) was needed since a life company can start or purchase a subsidiary without approval and Tenn. Code Ann. § 56-11-206 does not apply since no sale took place and no payment was made.

During September 2005, the Company increased shares authorized from 1,250 shares to 2,000 shares. An additional \$500,000 in paid up capital was received from PCIC's parent thereby increasing the shares outstanding from 1,000 shares to 1,500 shares. In November 2005, PIC paid as a dividend the stock of the Company to PGI. The amount of the dividend was \$5,509,220.

In September, 2006, ownership of PIC was transferred from PGI to the Company through a non-cash dividend amount of \$5,629,032, equal to the capital of PIC on the date of the transfer.

During 2007, a \$500,000 stock dividend was paid to PGI thus increasing the capital shares outstanding to 2,000.

At December 31, 2009, the Company had authorized capital stock of 2,000 shares of common stock with a par value of \$1,000.00 per share. All authorized shares were issued and outstanding. All of the outstanding shares of common stock of the Company are owned by PGI.

The Company paid ordinary cash dividends of \$700,000 in 2008 and \$1,000,000 in 2009 to PGI.

All operations are performed at the Company's home office at 2701 North Main Street, Crossville, Tennessee. The Company's development, since the previous examination, is depicted in the following table:



<u>Date</u>	<u>Admitted Assets</u>	<u>Total Liabilities</u>	<u>Capital &amp; Surplus</u>	<u>Premiums Earned</u>	<u>Losses Incurred</u>	<u>Underwriting Gain</u>	<u>Net Income</u>
12/31/05	10,830,414	5,161,423	5,668,991	6,417,896	2,576,929	40,418	301,083
12/31/06	19,348,065	7,271,048	12,077,017	9,210,769	3,866,453	124,905	394,158
12/31/07	21,006,056	7,903,986	13,102,070	7,214,969	2,621,076	409,937	828,830
12/31/08	19,608,119	6,637,212	12,970,907	7,199,499	2,323,840	563,821	951,933
12/31/09	22,861,352	7,456,532	15,404,820	7,276,849	2,453,248	566,481	755,960

### CHARTER AND BYLAWS

#### Charter:

The original Charter of the Company was filed with the Tennessee Secretary of State on December 28, 1995. The original charter established the Company as a for profit corporation. The stated purpose of the corporation is as follows:

In addition to the powers set out in Tennessee Code Annotated Section § 48-13-102, the Company shall have the power to engage in the business of insurance as a principal, including without limitation the property and casualty insurance business.

The Charter was amended and restated on September 21, 2005, and changed the number of authorized shares from 1,250 shares to 2,000 shares.

In addition to the preceding, the Charter recites other general and specific powers in detail. These are usual in nature and consistent with statute. The Charter was inspected and found to have been duly issued and properly recorded.

Bylaws:

The Bylaws establish the rules which regulate the business and affairs of the Company and govern the conduct and duties of its stockholders, directors and officers. The Bylaws of the Company are such as are generally found in corporations of this type and contain no unusual provisions. They may be amended by the Board of Directors or by an affirmative vote of the holders of a majority of the issued and outstanding common stock of the Company. There were no amendments to the Bylaws during the period under examination.

MANAGEMENT AND CONTROL

The Company's Bylaws state that the property, affairs and business of the corporation shall be managed by a Board of Directors who are elected at the annual meeting of the stockholders. The Bylaws state that the number of directors shall consist of no fewer than three or more than ten.

PCIC's Board of Directors, as of December 31, 2009, are as follows:

<u>Name</u>	<u>Address</u>	<u>Occupation</u>
William Dickson Williams	Knoxville, TN	President & CEO, The Plateau Group, Inc.
Thomas L. Williams	Crossville, TN	Executive Vice President, The Plateau Group, Inc.
Euretha J. Roberts	Baxter, TN	Senior Vice President & Secretary, The Plateau Group, Inc.
D. Michael Graham	Crossville, TN	Senior Vice President, The Plateau Group, Inc.
Michael Ramsey	Crossville, TN	Vice President & Treasurer, The Plateau Group, Inc.

The Company's Bylaws provide that the officers of the corporation shall be elected annually by the Board of Directors and shall consist of a President, a Secretary, and such other officers as may be from time to time appointed by the Board of Directors.

The Officers of PCIC, as of December 31, 2009, are as follows:

<u>Name</u>	<u>Office Held</u>
William Dickson Williams	President
Thomas L. Williams	Executive Vice President
Euretha J. Roberts	Secretary
D. Michael Graham	Sr. Vice President
Michael Ramsey	Treasurer

Conflicts of Interests:

PGI has an Ethics Policy in place that applies to all employees of the Group. The Ethics Policy does require disclosure of conflicts of interest; however, not on an annual basis. Early in the examination, it was suggested that the Company should have its own policy that applies to its officers and directors. Further, the policy should address conflicts of interest and contain procedures for annual disclosure of conflicts. During the examination, the Company established a written Code of Conduct that includes requirements and procedures for annual disclosure of conflicts of interest by its officers and directors. The Code was adopted on March 21, 2011. Current disclosure statements for Company officers and directors were obtained and reviewed without exception.

Pecuniary Interest:

A check for compliance with Tenn. Code Ann. § 56-3-103 found that no director or officer of the Company had pecuniary interest in the investment or disposition of Company funds.

Holding Company:

The Company is a member of an insurance holding company system as defined by Tenn. Code Ann. § 56-11-101, and as such, is subject to the "Insurance Holding Company System Act of 1986," set forth in Tenn. Code Ann. §§ 56-11-101, et seq. All required holding company filings during the examination period have been made by the Company's parent, PGI. PGI was incorporated in Tennessee on July 29, 1980, as an insurance holding company. A complete organizational chart is included on page 27 of this report.

The following agreements with affiliated companies were in effect at December 31, 2009:

Management Service Agreement:

Effective July 1, 1997, the Company entered into a Management Service Agreement with its parent, PGI. According to the terms and provisions of the Agreement, PGI agrees to provide the Company with all management, professional, technical, clerical and other services necessary to operate. In consideration for these services, the Company pays to PGI an amount equal to five percent of net written premiums.

Tax Allocation Agreement:

Effective March 26, 2001, the Company entered into a Tax Allocation Agreement with its parent, PGI. The Agreement states the Company has elected, through the provisions of the Internal Revenue Code, to be included in a consolidated tax return. The Company agrees to pay each year federal income taxes equivalent to the amount it would have paid if it were on a separate return basis without the benefit of exemptions under Internal Revenue Code (IRC) 11(b) and IRC 55(d). Additionally, the Company agrees to allow the Plateau Group to use and allocate any applicable sur-tax exemptions under IRC 11(b) and alternative minimum tax exemptions under

IRC 55(d) without further consent.

The above mentioned agreements have been submitted to and approved by the TDCI.

### CORPORATE RECORDS

The minutes of the meetings of the Board of Directors and stockholders were reviewed for the period under examination. They were found to be complete as to necessary detail and appear to adequately reflect the acts of the respective parties. The review of the minutes indicates that all investment transactions were approved by the Board of Directors.

### FIDELITY BOND AND OTHER INSURANCE

The Company is listed as a named insured on a Commercial Crime policy carried by PGI. Additionally, the Company is a named insured on the following insurance coverages maintained by PGI at December 31, 2009:

Commercial General Liability	Commercial Umbrella Liability
Commercial Inland Marine	Commercial Property
Commercial Automobile	Workers' Compensation and Employers' Liability

The crime coverage is in excess of the suggested minimum amount per the NAIC Financial Condition Examiners Handbook. The policies noted above were reviewed without exception. All of the above policies were issued by companies licensed to transact business in the State of Tennessee.

## RETIREMENT PLAN AND OTHER EMPLOYEE BENEFITS

The Company has no employees and does not participate in any pension plans.

## TERRITORY

The Company is licensed in Alabama, Georgia, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee. The Certificates of Authority issued by the states listed above were inspected without exception. Below is a tabulation of the Company's 2009 direct premium written:

<u>State/Territory</u>	Direct Premiums <u>Written</u>
Alabama	\$ 1,891,058
Georgia	1,863,306
Louisiana	562,734
Mississippi	3,057,748
North Carolina	0
South Carolina	249,346
Tennessee	5,249,740
Totals	<u>\$ 12,873,932</u>

## PLAN OF OPERATION

The Company's primary products are vehicle service contracts, guaranteed auto protection coverage and various consumer credit insurance products. PCIC markets its products through consumer finance companies, automobile dealerships, and banks, collectively (the "Producers").

PCIC's credit property coverage primarily insures the underlying financed asset in the event the property is damaged or lost and the debtor ceases making payments on it.

The guaranteed auto protection (GAP) product insures the difference between the loan payoff and the value of the vehicle in the case of a total loss.

The Company issued a Contractual Liability Insurance Policy (CLIP) to its affiliate, Plateau Service Company (PSC) to cover PSC's obligations from vehicle service contracts (VSC) marketed to consumers. The VSC is not an insurance policy but is a contractual arrangement between PSC and the consumer. PSC provides the administration of the VSC and is the obligor on the VSC. The CLIP issued to PSC shifts the warranty liability to the Company.

With the exception of the VSC product, most products are issued as group policies to the financial institutions and auto dealers and the consumer participates via a certificate of insurance.

Many of the producers have organized reinsurance companies to which PCIC cedes risks thus allowing the producers to participate in the profit/loss of the business. These reinsurance companies are known as producer owned reinsurance companies (PORCs). PGI and the Company specialize in setting up and managing PORCs as a primary way to add new credit insurance relationships. The services offered include licensing, financial and tax return preparation/filings and regulatory support. PGI and the Company acts as Treasurer for and controls all of the assets of these PORCs. These assets are held in domestic banks.

## REINSURANCE

PCIC is party to several reinsurance agreements whereby risks are ceded to the various PORCs which are owned by financial institutions and automotive dealers (in many cases shareholders of PGI) that market the Company's products. The reinsurance agreements between the Company and the unauthorized PORCs are on a 100% coinsurance basis. At December 31, 2009, the Company had agreements with 33 PORCs. During the period under examination, the Company added 13 new reinsurers and terminated 3. A sample of agreements with the new reinsurers were reviewed for required provisions and for adequate transfer of risk. No exceptions were noted.

The reinsurers have in place custodial deposit agreements or letters of credit for the safeguarding of ceded reserves. The custodial accounts specify how reserve funds may be held, and the custodian also monitors required amounts. The reserves of the assuming companies are set by a consulting actuary. The Company retains all underwriting and claim payment authority on risks ceded to PORCs. A sample of deposits were verified without exception.

The GAP business is ceded to an affiliate, Plateau Reinsurance Company (PRC), which is wholly-owned by PGI. Subsequent to the end of the year, the Company reassumed the business that was ceded to PRC via a risk portfolio transfer agreement dated January 1, 2010, and the reinsurance agreement was commuted in January, 2010. See the Subsequent Events section of this report for additional information.



Unearned Ceding Commission:

Primarily all of the Company's reinsurance agreements cede premiums on a written basis, and therefore, in the event of termination, the Company would be obligated to return any unearned ceding commissions to the reinsurers. However, all of the agreements provide that in the event of termination, the reinsurance continues to apply to all policies in force until their expiry or cancellation in the normal course of business. No return of premium or ceding commission would be required at the termination of an agreement because the policies continue in full force. The majority of the Company's reinsurance agreements provide that ceding commissions be paid based on net premiums; that is, on written premiums less the return premiums on policies that are cancelled by policyholders prior to the end of the policy period. The agreements provide for monthly settlements, including any return premiums and any associated ceding commissions, by offset. Therefore, the Company is deemed to have no ultimate liability for unearned ceding commissions.

LOSS EXPERIENCE

The loss experience of the Company, since the previous examination, as reported in its annual statements, is as follows:

	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Earned Premiums	6,417,896	9,120,769	7,214,969	7,199,499	7,276,849
Losses and LAE					
Incurred	2,795,701	4,210,007	2,963,863	2,595,039	2,683,738
Loss Ratio	<u>43.6%</u>	<u>46.2%</u>	<u>41.1%</u>	<u>36.1%</u>	<u>36.9%</u>
Other Underwriting					
Expenses	3,581,777	4,785,857	3,841,169	4,040,639	4,026,630
Combined Ratio	<u>99.4%</u>	<u>98.6%</u>	<u>94.3%</u>	<u>92.2%</u>	<u>92.2%</u>

## STATUTORY DEPOSITS

The Company maintained the following deposits at December 31, 2009:

<u>Where Deposited and Description</u>	<u>Par Value</u>	<u>Statement Value</u>	<u>Market Value</u>
Louisiana			
Certificate of Deposit, .90%	\$ 100,000	\$ 100,000	\$ 100,000
North Carolina			
Mecklenburg Co., 5.0%, Due 2/1/14	800,000	856,178	917,760
South Carolina			
FHLB, 2.15%, Due 7/9/12	130,000	130,518	130,643
Tennessee			
FNMA, 2.375%, Due 10/9/12	350,000	350,000	351,661
FHLMC, 2.50%, Due 4/8/13	<u>150,000</u>	<u>150,279</u>	<u>150,927</u>
Sub-total Tennessee	<u>500,000</u>	<u>500,279</u>	<u>502,588</u>
Totals	<u>\$1,530,000</u>	<u>\$1,586,975</u>	<u>\$1,650,991</u>

The deposits listed above are for the benefit of all policyholders, claimants and creditors of the Company. The deposits were verified by direct correspondence with the regulating jurisdiction or custodian.

## COMMITMENTS AND CONTINGENCIES

From the examination data made available, it appears that the only matters of law in which the Company was involved, during the period under review, were those arising out of the normal course of business and the outcome of such actions should not have a material effect on the financial position of the Company.

## ACCOUNTS AND RECORDS

During the course of examination, such tests and audit procedures were made as were considered necessary, including verification of postings, extensions and footings. Accounting records conform to generally accepted insurance accounting practices and appear to properly reflect the operations during the period under examination and the status of the Company at the date of examination.

The Company is audited annually by Crowe Horwath, LLP, Brentwood, Tennessee. There is no violation of Tenn. Comp. R. & Reg., ch. 0780-1-65.07(3).

## ACTUARIAL REVIEW

TDCI contracted with the independent actuarial firm of Lewis & Ellis, Inc., Richardson, Texas, to assist with this examination. Lewis & Ellis was retained to review the actuarial assumptions, methodologies, and adequacy of the actuarial liabilities established by the Company. They concluded the methods used are appropriate and the actuarial liabilities, as of December 31, 2009, are adequate.

## MARKET CONDUCT ACTIVITIES

### Policy Forms and Rates:

All required filings to the TDCI have been made and approved.

Advertising:

The Company does not actively advertise.

Policyholder Complaints:

Complaints filed during the period under examination were reviewed and it was determined that the Company keeps sufficient records of each complaint received. Inquiries made to the TDCI Consumer Insurance Services section indicated no specific regulatory concerns with the Company during the period under examination.

Privacy:

The Company's privacy policy and practices were reviewed. No instances of non-compliance with Tenn. Comp. R. & Reg., ch. 0780-1-72 were noted.

Claims Review:

A review of claims was made and indicates that claims are being handled properly, timely and in accordance with policy provisions. A sample of paid claim files reviewed indicated that claims were being paid upon receipt of proper evidence of the Company's liability.

SUBSEQUENT EVENTS

Subsequent to December 31, 2009, the Company reassumed the business that was ceded to Plateau Reinsurance Company under a risk portfolio transfer agreement dated January 1, 2010. The impact, on the Company's 2010 annual statement, was an increase in unearned premiums of approximately \$2,872,000, an increase in loss and loss adjustment expense liability of approximately \$5,136,000, and a net transfer

of cash and cash equivalents of \$980,000. As a result of this transaction, the Company recognized a reduction in earnings of approximately \$2,028,000.

## FINANCIAL STATEMENT

There follows a statement of assets, liabilities, surplus and other funds, and a statement of income at December 31, 2009, together with a reconciliation of capital and surplus for the period under review, as established by this examination:

### ASSETS

	<u>Assets</u>	Non Admitted <u>Assets</u>	Net Admitted <u>Assets</u>
Bonds	\$ 9,506,640	\$ 856,178	\$ 8,650,462
Preferred stocks	86,800	0	86,800
Common stocks	9,206,319	0	9,206,319
Cash, cash equivalents and short term investments	4,348,534	0	4,348,534
Other invested assets	<u>111,281</u>	<u>0</u>	<u>111,281</u>
Subtotals, cash and invested assets	<u>23,259,574</u>	<u>856,178</u>	<u>22,403,396</u>
Investment income due and accrued	106,256	0	106,256
Uncollected premiums and agents' balances in the course of collection	2,900	0	2,900
Amounts recoverable from reinsurers	140,279	0	140,279
Net deferred tax asset	710,970	502,449	208,521
Write-ins for other than invested assets: Prepaid expenses	<u>7,597</u>	<u>7,597</u>	<u>0</u>
Total assets	<u>\$ 24,227,576</u>	<u>\$ 1,366,224</u>	<u>\$ 22,861,352</u>

## LIABILITIES, SURPLUS AND OTHER FUNDS

### Liabilities

Losses	\$ 414,287
Loss adjustment expenses	62,143
Commissions payable	291,615
Other expenses	119,322
Taxes, licenses and fees	107,458
Current federal income taxes	56,192
Unearned premiums	5,991,066
Ceded reinsurance premiums payable	399,236
Payable to parent, subsidiaries and affiliates	<u>15,213</u>

Total liabilities 7,456,532

### Surplus and Other Funds

Common capital stock	2,000,000
Gross paid in and contributed surplus	7,629,032
Unassigned funds	<u>5,775,788</u>

Surplus as regards policyholders 15,404,820

Totals \$ 22,861,352

## STATEMENT OF INCOME

### Underwriting Income

Premiums earned		\$ 7,276,849
Deductions:		
Losses incurred	\$ 2,453,248	
Loss expenses incurred	230,490	
Other underwriting expenses incurred	<u>4,026,630</u>	
Total underwriting deductions		<u>6,710,368</u>
Net underwriting gain (loss)		<u>566,481</u>

### Investment Income

Net investment income earned	426,922	
Net realized capital gains (losses)	<u>2,280</u>	
Net investment gain (loss)		<u>429,202</u>

### Other Income

Aggregate write-ins for miscellaneous income:		
Other income	<u>12</u>	
Total other income		<u>12</u>
Net income before federal income taxes		995,695
Federal income taxes incurred		<u>239,735</u>
Net income		<u>\$ 755,960</u>



**RECONCILIATION OF CAPITAL AND SURPLUS  
FOR THE PERIOD UNDER EXAMINATION**

	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>
Capital and surplus, December 31, previous year	<u>\$ 4,991,269</u>	<u>\$ 5,668,991</u>	<u>\$12,077,017</u>	<u>\$13,102,070</u>	<u>\$12,970,907</u>
Net income (loss)	301,083	394,158	828,830	951,933	755,960
Change in net unrealized capital gains (losses)	0	355,348	180,895	485,415	2,510,928
Change in net deferred income tax	134,216	110,577	38,368	307,910	(4,878)
Change in nonadmitted assets	(257,577)	(81,089)	(23,040)	(1,176,421)	171,903
Paid in capital	500,000	0	0	0	0
Transferred from surplus	0	0	500,000	0	0
Paid in surplus	0	5,629,032	0	0	0
Transferred to capital	0	0	(500,000)	0	0
Dividends to stockholders	<u>0</u>	<u>0</u>	<u>0</u>	<u>700,000</u>	<u>1,000,000</u>
Net change in capital and surplus for the year	<u>677,722</u>	<u>6,408,026</u>	<u>1,025,053</u>	<u>(131,163)</u>	<u>2,433,913</u>
Capital and surplus, December 31, current year	<u>\$ 5,668,991</u>	<u>\$12,077,017</u>	<u>\$13,102,070</u>	<u>\$12,970,907</u>	<u>\$15,404,820</u>

ANALYSIS OF CHANGES IN FINANCIAL STATEMENT AND COMMENTS  
RESULTING FROM EXAMINATION

Although minor differences were found in various items, none were considered to produce a material effect on surplus funds either singly or in the aggregate.

## COMMENTS AND RECOMMENDATIONS

### Comments:

1. During the examination, it was found that the Company had no Anti-Fraud Plan as required by Tenn. Code Ann. § 56-53-111. Prior to completion of the examination, the Company prepared and adopted a plan. It was reviewed and found to be in compliance.

### Recommendations:

None

## CONCLUSION

The customary insurance examination practices and procedures, as established by the NAIC, have been utilized in connection with the verification and valuation of assets and the determination of liabilities in the financial statement of this report.

In such manner, it was determined that, as of December 31, 2009, the Company had net admitted assets of \$22,861,352 and liabilities of \$7,456,532. Thus, there existed for the additional protection of the policyholders, the amount of \$15,404,820 in the form of common capital stock, gross paid in and contributed surplus, and unassigned funds.

The courteous cooperation of the Company, extended during the course of the examination, is hereby acknowledged.

In addition to the undersigned, Keith M. Patterson, Insurance Examiner, State of Tennessee, and Michael A. Mayberry, FSA, MAAA of Lewis & Ellis, Inc., Actuaries & Consultants, participated in the work of this examination.

Respectfully submitted,



David R. White, CFE  
Examiner-in-Charge  
State of Tennessee  
Southeastern Zone, NAIC

AFFIDAVIT

The undersigned deposes and says that he has duly executed the attached examination report of the Plateau Casualty Insurance Company dated May 6, 2011, and made as of December 31, 2009, on behalf of the TDCI. Deponent further says he is familiar with such instrument and the contents thereof, and that the facts therein set forth are true to the best of his knowledge, information and belief.

David R. White  
David R. White, CFE  
Examiner-in-Charge  
State of Tennessee  
Southeastern Zone, NAIC

Subscribed and sworn to before me this

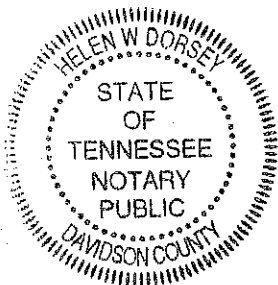
6<sup>th</sup> day of May, 2011

Notary Helen W. Dorsey

County Davidson

State Tennessee

Commission Expires 03/03/2014



# ORGANIZATIONAL CHART

