EXHIBIT A

STATE OF TENNESSEE

DEPARTMENT OF COMMERCE AND INSURANCE

REPORT ON EXAMINATION

OF

PLATEAU CASUALTY INSURANCE COMPANY

CROSSVILLE, TENNESSEE

AS OF

DECEMBER 31, 2024

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Crossville, Tennessee
May 21, 2026

Honorable Carter Lawrence
Commissioner
Tennessee Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, Tennessee 37243

Dear Commissioner:

In accordance with your instructions and pursuant to Tennessee Code Annotated ("Tenn. Code Ann.") § 56-1-408, a full-scope financial examination and market conduct review, as of December 31, 2024, has been made of the condition and affairs of:

PLATEAU CASUALTY INSURANCE COMPANY
NAIC # 10817
2701 North Main Street
Crossville, Tennessee 38555

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

INTRODUCTION

This examination was arranged by the Tennessee Department of Commerce and Insurance (TDCI or "Department"). The examination was conducted by duly authorized representatives of the Department. This examination was called through the National Association of Insurance Commissioners (NAIC) Financial Examination Electronic Tracking System (FEETS).

This examination was made simultaneously with the Company's subsidiary, Plateau Insurance Company (PIC). Further description of the coordination effort between the states is discussed below under the heading "Scope of Examination."

SCOPE OF EXAMINATION

The last examination of the Company was made as of December 31, 2019. This examination covers the period January 1, 2020, through December 31, 2024, and includes any material transactions and/or events occurring subsequent to the examination date which were noted during the course of the examination.

The Company is part of a holding company group with other insurers. Tennessee is the Lead State. Insurers in the holding company group include Plateau Insurance Company (PIC), Plateau Casualty Insurance Company (PCIC), and Westport Life Insurance Company (WLIC). PIC and PCIC are both Tennessee domiciled companies while WLIC is an Arizona domiciled entity. Tennessee provided notice of the examination to Arizona along with an offer for coordination. Arizona declined the invitation to participate in the examination given that WLIC's business is limited to the assumption of credit life and disability insurance from PIC.

The examination was conducted in accordance with rules and procedures as prescribed by the statutes of the State of Tennessee, and in accordance with practices and procedures promulgated by the NAIC in the Financial Condition Examiners Handbook ("Handbook"), as deemed appropriate. The examination was planned and performed to evaluate the financial condition of the Company, as of December 31, 2024. The examination sought to identify prospective risks by obtaining information about the Company, including its corporate governance, by identifying and assessing inherent risks within the Company, and by 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 significant risks were considered when planning which key activities and accounts would be examined. The key activities included: Capital and Surplus, Cash and Investments, Reinsurance (Assumed), Reinsurance (Ceded), Related Party, Reserves and Claims Handling (P&C), and Pricing and Underwriting.

The Company's 2024 annual statement was compared with or reconciled to the corresponding general ledger account balances.

Independent information technology specialist services, provided by Noble Consulting Services, Inc. were utilized in the examination review of the Company's information technology general controls (ITGC).

The actuarial firm Select Actuarial Services was utilized in the examination review of the Company's reinsurance and statutory reserves, as well as the risk assessment and review of controls for Reserving and Pricing key activities.

The Company's Certified Public Accountant (CPA) workpapers were reviewed for the 2024 audit and copies were incorporated into the examination, as deemed appropriate.

A separate market conduct review was performed concurrently with the financial examination. See the "Market Conduct Activities" section of this report.

COMPLIANCE WITH PREVIOUS EXAMINATION FINDINGS

The examination included a review to determine the current status of the comments and recommendations from the previous report of examination dated December 7, 2020, which covered the period from January 1, 2015, through December 31, 2019. The previous full-scope examination contained two (2) comments and two (2) recommendations, detailed below.

Comments

1. A review of the complaint log found it did not contain all of the information required by Tenn. Code Ann. § 56-8-104(11). During the course of the prior examination, the Company corrected its complaint log to be in compliance with the Tennessee Code.

   Update: No issues were noted during this examination.

2. All of the agents utilized by the Company during the prior examination period were found to be licensed and appointed with the exception of one (1) due to an error. The Company corrected this error prior to completion of the prior examination fieldwork and properly appointed the agent so that it was in compliance with Tenn. Code Ann. §§ 56-6-103, 104, and 115.

   Update: No issues were noted during this examination.

Recommendations

1. The NAIC *Annual Statement Instructions* ("Instructions") require the Appointed Actuary to report to the Board of Directors ("Board") or the Audit Committee each year on the items within the scope of the Actuarial Opinion. The Instructions state that the minutes of the Board shall indicate that the Appointed Actuary has presented such information to the Board or the Audit Committee. Per review of the Board minutes for the Company and its parent, The Plateau Group, Inc. ("PGI"), there was no consistent documentation of review by the Board of the actuaries' annual report and findings.

It was recommended the Board receive and review the actuaries' annual report and findings and document the review in the meeting minutes in accordance with the Instructions.

Update: Board meeting minutes from the current examination period were reviewed, noting lack of review and approval of the actuarial opinion in 2022, in violation of the Instructions. Therefore, this is a repeat finding for the current examination. See the "Comments and Recommendations" section of this report for additional details.

2. The Company has not conducted on-site reviews of its Managing General Agents at least semi-annually, as required by Tenn. Code Ann. § 56-6-505(c).

   It was recommended the Company conduct on-site reviews as required by Tenn. Code Ann. § 56-6-505(c).

   Update: No issues were noted during this examination.

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.

In September 2006, ownership of affiliated company, PIC, was transferred from the parent, PGI, to the Company by virtue of a non-cash dividend in the amount of $5,629,032. This dividend amount represented the statutory book value of PIC as of the effective date of the transfer. After this restructuring, the ownership structure was that PGI owns one hundred percent (100%) of PCIC, which in turn owns one hundred percent (100%) of PIC.

In 2018, PGI formed Plateau Warranty Company (PWC), a motor vehicle service agreement company, organized in order to comply with requirements of Chapter 634, Part 1 (Chapter 634) of Florida statutes. PWC is incorporated in the state of Tennessee and was granted a license to do business in the state of Florida. PWC operates as a provider of motor vehicle service agreements to automobile dealers doing business in the state of Florida. It was initially wholly-owned by the Company and was capitalized with $200,000 in common voting stock and an additional $350,000 of paid-in capital. On December 1, 2019, the ownership of PWC was transferred from the Company to PGI in exchange for

$537,619, which equaled PWC's book value at the time of transfer.

In December 2021, PGI was purchased by Cardiff Insurance Group, LLC ("Cardiff"), a subsidiary of Hoplon Capital, LLC ("Hoplon").

MANAGEMENT AND CONTROL

MANAGEMENT

Directors

The Company's Bylaws state that the property, affairs, and business of the corporation shall be managed by a Board of Directors ("Board") who are elected at the annual meeting of stockholders. The Bylaws state that the number of directors shall consist of no fewer than three (3) or more than ten (10) members.

The following is a listing of persons serving as directors of the Board as of December 31, 2024:

Name	Principal Occupation
Robert Arsov	President, Hoplon
Christopher Ryan Walters	Vice President, Hoplon
William Michael Reinsch	President, Transpo International Ltd.
Brian John Nolan	Executive Vice President, Pennsylvania Physicians Reciprocal Insurers

The Company was unable to provide evidence of an annual shareholder meeting for the election of the above-listed directors in accordance with the Company's Bylaws and Tennessee Code § 48-17-101. See "Comments and Recommendations" section of this report for additional details.

Officers

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

The following officers were duly elected by the Board and serving as officers of the Company as of December 31, 2024:

Name	Title
David Michael Graham	President
Cynthia Starrett	Chief Financial Officer

Maria Varandela Amoedo	Secretary
Tracy Dale Graham	Treasurer

The administrative and executive functions of the Company are performed by staff employed through its parent, PGI, and provided to the Company under the recitals of a Management Service Agreement between the Company and PGI as described in this report under the heading "Agreements with Parent, Subsidiaries, and Affiliates." Certain services are purchased from outside contractors, if needed and not available from in-house personnel. Such services include actuarial analysis and independent audit.

Committees

The Company's only Board committee is the Audit Committee. The mission of the Audit Committee is to provide an independent and objective assessment of the Company's activities, operations, financial systems, and internal controls. Effective September 13, 2024, the Audit Committee of PCIC sits at the PGI level as authorized by Tennessee Compilation of Rules and Regulations (Tenn. Comp. R. & Regs.) 0780-01-65-.15(7).

The following individuals were serving on the Audit Committee as of December 31, 2024:

Name	Title
Maria Amoedo	Corporate Secretary
William Reinsch	President, Transpo International Ltd.
Christopher Walters	Vice President, Hoplon

CONTROL

The Company is a member of an insurance holding company system as defined by Tenn. Code Ann. § 56-11-101(b)(9), 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*. PGI files a holding company registration statement annually, as required by Tenn. Code Ann. §§ 56-11-105. The ultimate controlling person (UCP) of the Company is Robert Arsov.

ABBREVIATED ORGANIZATIONAL CHART

The following abbreviated organizational chart shows the members of the holding company group as listed within the Company's 2024 Annual Statement:

	NAIC Co. Code	Domiciliary State/Country	Percent Owned
Robert Arsov – UCP	-	CT	-
Hoplon Capital, LLC	-	DE	83.12%
Hoplon Asset Management, L.P.	-	DE	100%
Cardiff Insurance Group, LLC*	-	DE	91.05%

The Ohlson Group, Inc.	-	IN	100%
The Plateau Group, Inc.	-	TN	100%
Westport Life Insurance Company	62332	AZ	100%
Plateau Reinsurance Company	-	TN	100%
Plateau Service Company	-	TN	100%
Plateau Warranty Company	-	TN	100%
Plateau Casualty Insurance Company	**10817**	**TN**	**100%**
Plateau Insurance Company	97152	TN	100%
Horizon Services Reinsurance Limited	-	TCA	100%
Preferred Reinsurance, LTD	-	TCA	100%
Hoplon Fund II, L.P. **	-	DE	100%

* Cardiff is 45.94% owned by Hoplon and 45.11% owned by Hoplon Fund II, L.P. The remaining 8.95% is owned by Raymond, Nicholas, and Joseph Ohlson (collectively, the "Ohlson Family").

** Hoplon Fund II, L.P. was included on this abbreviated organizational chart due to its 45.11% ownership interest in Cardiff. All other organizations at the Hoplon level, and any subsidiaries, have been excluded from this chart.

DIVIDENDS

During the period of examination, the Company paid two ordinary dividends to its shareholder. The Company did comply with the requirements of Tenn. Code Ann. § 56-11-105(e) by notifying the TDCI of declaration of said dividends.

The following table lists each dividend amount and the date the Company notified the TDCI of the dividend.

Year	Ordinary or Extraordinary	Notification Date	Dividend Amount
2020	Ordinary	04/22/2020	$1,500,000
2021	Ordinary	03/01/2021	$2,500,000
Total amount paid during examination			$4,000,000

CORPORATE RECORDS

The minutes of the Company's shareholder, Board, and Audit Committee were reviewed for the period under examination. The Board and Audit Committee minutes were generally complete as to necessary detail and appear to adequately reflect the acts of the respective bodies. However, as noted in the "Comments and Recommendations" section, for each year under examination with the exception of 2022, PCIC's shareholders did not hold an annual meeting in accordance with Tenn. Code Ann. § 48-17-101.

Through review of Conflict of Interest disclosure statements of the officers and directors of the Company, it was found that the Company could not provide signed Conflict of Interest statements for the majority of the officers and directors of the Company at the examination date and could not provide any signed Conflict of Interest statements from 2020 through 2023. See the “Comments and Recommendations” section of this report for more details.

The review of the Board minutes indicates that all investment transactions were approved by the Board pursuant to Tenn. Code Ann. § 56-3-408(b)(1).

Charter

The Charter of the Company in effect as of December 31, 2024, is the Company’s Amended Charter, which was filed with the Secretary of State on May 2, 2011. The Charter states the Company is for-profit and organized to engage in the business of property and casualty insurance under the laws of the State of Tennessee. The Company made no amendments to its Charter during the period of examination.

Bylaws

The Bylaws of the Company in effect as of December 31, 2024, are the Company’s original Bylaws, which were adopted by the Board on May 1, 1997. No amendments or restatements were made during the period of examination. The Bylaws are such as are generally found in companies of this type and contain no unusual provisions. They provide for the regulation of the business and for the conduct of the affairs of the Company, the Board, and its shareholder.

AGREEMENTS WITH PARENT, SUBSIDIARIES, AND AFFILIATES

The Company had the following significant agreements with its parent and affiliated companies in effect, as of December 31, 2024.

Management Service Agreement

Effective July 1, 1997, PCIC entered into a management service agreement with PGI. Pursuant to the agreement, PGI agrees to provide the Company with all management, professional, technical, clerical, and other services necessary for PCIC to operate. In consideration of these services, the Company pays PGI an amount equal to five percent (5%) of net written premiums.

Effective January 1, 2014, the Company revised its Management Service Agreement with PGI. As in the earlier agreement, PGI agrees to provide all the management, professional, technical, clerical, and other services necessary for the Company to operate an insurance business. PGI agrees to accept a service fee of five percent (5%) of direct premiums written plus reinsurance premiums assumed from non-affiliated insurance companies, provided that PGI may discount such percentage for any year to a percentage not less than two and one-half percent (2.5%).

Effective June 16, 2017, the Management Service Agreement was amended to bring it into compliance with Statement of Statutory Accounting Principles (SSAP) No. 25 – Affiliates and Other Related Parties, by adding a specific due date for amounts owed under the agreement. In 2024, the amount paid to PGI by PCIC was approximately five percent (5%) of direct plus assumed premiums.

Lease Agreement

Effective January 1, 2013, PCIC is party to a lease agreement with PGI for use of PGI's home office located at 2701 North Main Street, Crossville, Tennessee. The agreement was amended twice during the examination period, on January 1, 2023, and January 1, 2024, to increase the monthly rent.

Consolidated Tax Agreement

Effective January 1, 2022, PCIC is party to a Federal Income Tax Allocation and Sharing Agreement with its parent and affiliates. Pursuant to this agreement, each member of the consolidated tax return filing group is to pay an amount toward the consolidated tax return liability, which generally consists of components equal to the taxable income.

TERRITORY AND PLAN OF OPERATION

TERRITORY

The Company is a stock for-profit property and casualty insurance company domiciled in Tennessee and is licensed to transact business in forty-nine (49) states, the District of Columbia, and Guam. Certificates of Authority granted by the licensed states were reviewed and found to be in force on December 31, 2024.

Premium tax records were reviewed for Tennessee, and no exceptions were noted. The Company currently has no applications pending for admission to any other states or territories.

PLAN OF OPERATION

The Company's primary products are typically written in conjunction with the extension of credit and include credit property coverage, guaranteed auto protection (GAP), vehicle service contracts (VSC), and various other consumer credit insurance products. The 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 GAP product insures the difference between the loan payoff and the value of the vehicle in the case of a total loss.

PCIC issued a Contractual Liability Insurance Policy (CLIP) to its affiliate, Plateau Service Company (PSC) to cover PSC's obligations from VSCs 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 obligator 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 institution and auto dealers, and the consumer participates through issuance of a certificate of insurance.

Many of the producers have organized reinsurance companies to which PCIC cedes risk, thereby allowing the producers to participate in the profit or loss of the business. These reinsurance companies are known as producer-owned reinsurance companies ("PORCs"). PGI and PCIC 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 and filings, and regulatory support. PGI and PCIC act as treasurers for and control the assets of the PORCs. PORC assets are held in U.S. domestic banks.

GROWTH OF COMPANY

The following exhibit depicts certain aspects of the growth and financial history of the Company for the period subject to this examination, according to its annual statements filed with the TDCI. *(Note: Failure of the columns to add to the totals reflected in this Report is due to rounding):*

Year	Admitted Assets	Liabilities	Capital and Surplus	Premiums Earned	Net Income
2024	$78,379,542	$42,415,824	$35,963,718	$50,196,140	$(484,232)
2023	$68,947,415	$34,266,320	$34,681,095	$39,993,067	$1,071,066
2022	$65,462,204	$33,287,390	$32,174,814	$37,700,485	$1,978,856
2021	$63,305,688	$33,320,032	$29,985,656	$30,475,009	$2,499,988
2020	$54,754,857	$25,584,065	$29,170,792	$22,588,911	$2,542,532

LOSS EXPERIENCE

As developed from applicable amounts included in the Company's annual statements, the ratios of losses and loss adjustment expenses (LAE) incurred to earned premiums for the period subject to this examination were as follows:

Year	Losses Incurred	LAE Incurred	Premiums Earned	Loss Experience Ratio
2024	$27,230,709	$2,039,255	$50,196,140	58.3%
2023	$19,721,669	$1,956,290	$39,993,067	54.2%
2022	$16,661,845	$1,880,324	$37,700,485	49.2%
2021	$12,690,134	$1,896,213	$30,475,009	47.9%
2020	$9,127,576	$1,423,868	$22,588,911	46.7%

REINSURANCE AGREEMENTS

The Company's significant reinsurance agreements were found to contain such language as recommended by the NAIC and as required for reinsurance credit pursuant to Tenn. Code Ann. § 56-2-207(a)(2). All agreements appear to effectuate proper transfer of risk in accordance with SSAP No. 62 – Property and Casualty Reinsurance, and NAIC guidelines.

The significant reinsurance agreements in effect as of December 31, 2024, are described below:

Assumed Reinsurance

Effective October 1, 2020, the Company entered into an agreement with Old Republic Insurance Company ("Old Republic") whereby certain VSCs and GAP contracts originating in the District of Columbia, New York, and Wyoming are written on Old Republic paper and ceded to Plateau Casualty Insurance Company on a written basis. The Company assumes one hundred percent (100%) of the risk on these contracts and ultimately cedes one hundred percent (100%) of the risk to producer owned reinsurance companies.

Ceded Reinsurance

Plateau Insurance Company (PIC)

The Company cedes one hundred percent (100%) of each all-cause death, disability and accidental death and dismemberment risk covered under a debt protection (cancellation) program to PIC effective January 1, 2014. All other risks covered by the CLIP, such as involuntary unemployment, family leave, and hospitalization remain with PCIC. Debt protection coverage involves a risk where a consumer's debt due to a financial institution will be cancelled in the event of certain specified occurrences. To this end, the Company issues a CLIP to the financial institution. The Company utilizes the FOURPOINT™ system of software and hardware to underwrite the financial institution's customers, track the loan payments by financial institution, and bill the financial institution monthly for a percentage of the monthly loan payments received by the financial institution. The customer pays the financial institution a fee based on the loan payment amount each month in addition to their loan payment for this protection provided by the financial institution.

This treaty was put in place to ultimately minimize the amount of retained risk on large certificates. Currently PIC desires to limit its retained risk on any one life certificate including all cause death risk and accidental death and dismemberment risk. PIC has in place with Munich American Reinsurance Company (MARC) a treaty whereby PIC cedes risk in excess of certain pre-determined amounts to MARC. MARC does not accept risk from non-life companies therefore PCIC could not enter into a reinsurance treaty directly with MARC. However, once the risk is ceded to PIC, it is able to retro-cede excess risk to MARC thereby allowing the companies to limit their retained risk on large certificates.

Virginia Surety Company, Inc. ("Virginia Surety")

In June 2024, the company received a request from Portfolio Services Limited, Inc. ("Portfolio"), a company which facilitates vehicle dealer sales of various finance and insurance products, to amend the scope of a certain underwriting agreement between Portfolio and PGI to exclude the Company's underwriting of service contracts issued by Portfolio affiliates to end customers in New York and Washington. Portfolio requested that the Company enter into an agreement whereby Virginia Surety and its affiliate, Assurant, Inc., would issue one (1) or more new CLIPs to assume one hundred percent (100%) of the obligations on New York and Washington service contracts covered by certain Company-issued CLIPs issued to Portfolio affiliates. To that end, effective November 30, 2024, PCIC ceded to Virginia Surety on a one hundred percent (100%) quota share basis all risk held by PCIC on New York and Washington service contracts issued by Portfolio affiliates.

Producer Owned Reinsurance Companies ("PORCs")

As of December 31, 2024, PCIC had in place in excess of one hundred (100) reinsurance agreements with various PORC's. Due to the nature of most producers, the majority of the business written by PCIC is ceded to a PORC. The basic types of business are credit property, vendor single interest, involuntary unemployment and VSC business. The involuntary unemployment business is written by finance companies and to a lesser extent banks and credit unions. In most cases, a PORC has the same ownership as the producer, and the producer directs through a reinsurance agreement that all their business is ceded to their PORC. In these cases, the PORC assumes one hundred percent (100%) of the risk available to be reinsured. In the case of VSC's, the structure is the same except the producers are automobile dealerships or administrator companies.

The PORC's are domiciled offshore or with a tribal domicile and as such are considered unauthorized companies for purposes of reserve credit taken by PCIC. The offshore PORC's each make an IRS election to be considered as a domestic insurance company. This has no effect on their status as an unauthorized company; however, it does simplify PCIC's reporting. In addition, all the transactions are completed in the US, including trust funds which are held in US Financial Institutions. Tribal domiciled companies work the same way; however, it is not necessary for those PORC's to make the IRS Election.

As part of PCIC's overall reinsurance program, company management monitors trust agreements and in most cases manages or facilitates the management of these trust funds. Because these PORC's are unauthorized companies, any reserve credits taken by PCIC must be fully collateralized by either a trust account or letter of credit. In addition to management of collateral for reserve credit, the Company prepares monthly financial statements, annual statements and tax returns for the majority of the PORC's.

The producers remit premium monthly which is then simultaneously ceded to the PORC's. PCIC adjudicates claims which are also ceded monthly. Each month cession reports are produced showing premium reinsured less claims paid, commissions paid (if applicable), ceding fees (retained by PCIC) and applicable state premium tax. These reports also contain applicable policy and claim reserves which must be collateralized.

Plateau Reinsurance Company (PRC)
PCIC has in place a reinsurance agreement with PRC, a Tennessee domiciled captive insurance company. This is a short-term reinsurance treaty where PCIC ceded certain first dollar VSC reserves to PRC on a written basis. PRC ultimately cedes this business on an earned basis to Captivate1 Reinsurance, LTD, a PORC. PCIC no longer cedes new premium to PRC under this treaty, and it should be fully earned during 2025.

ACCOUNTS AND RECORDS

During the course of the examination, certain balances were tested, and amounts were traced from the Company's trial balance to the annual statement. The Company's investment securities were confirmed with the custodian of such securities as of the date of this examination. All annual statements for the period under examination were reviewed for completeness and adequacy of disclosure. The Company's risk-based capital filings were reviewed. These test checks and reviews revealed no material discrepancies.

It was noted that the Company did not enter into a formal custody agreement with Polen Capital, which held a security on behalf of the Company with a fair value of $1,060,758 as of the examination date, nor received authorization by the Board for such in accordance with Tenn. Comp. R. & Regs. 0780-01-46-.02(2). See the "Comments and Recommendations" section of the report for further details.

The Company's books and records are located in Crossville, Tennessee.

MARKET CONDUCT ACTIVITIES

A market conduct review was made of the Company, as of December 31, 2024, in conjunction with this examination. The following items were addressed:

Operations and Management Standards
Company antifraud initiatives were examined to determine if they are reasonably designed to prevent, detect, or mitigate fraudulent insurance acts. It was found that certain claim and application forms did not include a fraud warning statement as required by Tenn. Code Ann. § 56-53-111. See the "Comments and Recommendations" section of this report for additional details.

Company procedures and policies relating to privacy were reviewed to determine compliance with Tenn. Code Ann. § 56-8-104(19). No issues or concerns were identified.

Complaint Handling Practices
The Company maintains a complaint register and supporting files as required by various state Unfair Trade Practices Acts. The complaint register was examined in accordance with requirements of Tenn. Code Ann. § 56-8-104(11) and the NAIC Market Regulation Handbook ("Market Handbook") and was found to be in compliance.

Marketing and Sales Standards
A sample of the Company's advertising materials were selected for examination including print, internet materials, social media sites, and PowerPoint presentations issued by the company to target consumers, agents, brokers, and financial institutions. Advertising items were examined in accordance with Tenn. Code Ann. § 56-8-104(1) and the Market Handbook (Chapter 20 (C) – Marketing and Sales) and were found to be in compliance.

Producer Licensing Standards

A review was performed of the Company's licensed and appointed agents. All of the agents utilized by the Company during this examination were found to be licensed and appointed in compliance with Tenn. Code Ann. §§ 56-6-103, 104 and 115.

Policyholder Services Standards

The Company's timeliness of policy issuance, premium billing, response to policyholder requests, provisions of adequate disclosures, and compliance with applicable statutes and rules were examined. The Company was found to be in compliance with the relevant market conduct standards.

Underwriting and Rating Standards

In the examination of the Company's underwriting procedures and policy administration, policy files for open and closed policies were reviewed in accordance with Tenn. Code Ann. § 56-8-104, Tenn. Comp. R. & Regs. 0780-01-34, and established Company guidelines. In the examination of these contracts, there were no instances of unfair methods of competition or unfair or deceptive acts found. Underwriting procedures and policy administration conducted by the Company appear to be in compliance with established Company guidelines.

The examiners reviewed a sample of the policy forms that were used by the Company during the period of examination. All forms were noted, without exception, as having been filed with the TDCI prior to their use, in accordance with Tenn. Code Ann. § 56-7-2311(a). The filings are consistent in form and include appropriate documentation.

Claims Handling Standards

In the examination of claims handling standards, the Company's efficiency of claims handling, accuracy of payment, adherence to contract provisions, and compliance with applicable statutes and rules were examined. In conducting the examination, random samples were selected from claims approved and resisted by the Company. The Company's claims were properly documented and handled in accordance with the Company's policy provisions and applicable statutes and rules. No issues or concerns were identified.

SUBSEQUENT EVENTS

During the examination, a review of subsequent events was performed. No events were noted that required additional disclosure in this examination report. Management stated in its Letter of Representation that they were not aware of any events subsequent to

December 31, 2024, that could have a material effect on the Company's financial condition. Our review confirmed the Company's disclosures in its 2024 Annual Statement and in its Letter of Representation.

Per a no-objection letter from the TDCI, dated February 23, 2026, PGI will use the name "Lumos Insurance" as an assumed name at the holding company level for marketing purposes. The legal names of Plateau Casualty Insurance Company and Plateau Insurance Company remain unchanged.

On March 20, 2026, the TDCI approved PCIC's request to pay a $1,025,000 extraordinary dividend to PGI.

FINANCIAL STATEMENTS

There follows a statement of assets, liabilities, surplus and other funds, and a statement of income, as of December 31, 2024, together with a reconciliation of capital and surplus for the period under review, as reported by the Company in its 2024 Annual Statement. *(Note: Failure of the columns to add to the totals reflected in this Report is due to rounding.)*

ASSETS

	Assets	Non-Admitted Assets	Net Admitted Assets
Bonds	$ 34,387,426		$ 34,387,426
Preferred stocks	1,492,374		1,492,374
Common stocks	23,636,931		23,636,931
Real estate:			
Properties occupied by the company	201,280		201,280
Cash, cash equivalents, and short-term investment	10,804,153		10,804,153
Other invested assets	250,000		250,000
Investment income due or accrued	175,877		175,877
Premiums and considerations:			
Uncollected premiums and agents' balances in the course of collection	3,508,334		3,508,334
Reinsurance:			
Amounts recoverable from reinsurers	1,511,214		1,511,214
Other amounts receivable under reinsurance contracts	1,205,334		1,205,334
Net deferred tax asset	1,298,382	$ 93,643	1,204,739
Furniture and equipment	7,316	7,316	
Aggregate write-ins for other-than-invested assets	48,806	46,927	1,879
Totals	$ 78,527,427	$ 147,885	$ 78,379,542

LIABILITIES, SURPLUS AND OTHER FUNDS

Losses		$ 5,258,023
Loss adjustment expenses		736,416
Commissions payable, contingent commissions and other similar charges		3,188,072
Other expenses		325,936
Taxes, licenses and fees		1,286,555
Current federal and foreign income taxes		79,623
Unearned premiums		27,217,599
Ceded reinsurance premiums payable		4,162,170
Provision for reinsurance		161,429
Total Liabilities		$ 42,415,824
Common capital stock	$ 4,200,000	
Gross paid in and contributed surplus	7,129,032	
Unassigned funds (surplus)	24,634,686	
Surplus as regards policyholders		35,963,718
Totals		$ 78,379,542

STATEMENT OF INCOME

UNDERWRITING INCOME		
Premiums earned	$ 50,196,140	
Deductions:		
Losses incurred	27,230,709	
Loss adjustment expenses incurred	2,039,255	
Other underwriting expenses incurred	22,394,136	
Net Underwriting Gain (Loss)		$ (1,467,960)
INVESTMENT INCOME		
Net investment income earned	1,182,412	
Net realized capital gains (losses)	(94,058)	
Net Investment Gain		1,088,354
Net income before federal income taxes		(379,606)
Federal and foreign income taxes incurred		104,626
Net Income		$ (484,232)

CAPITAL AND SURPLUS ACCOUNT

	2024	2023	2022	2021	2020
Capital and Surplus December 31, previous year	$34,681,096	$32,174,814	$29,985,656	$29,170,792	$27,165,692
Net income or (loss)	(484,232)	1,071,066	1,978,856	2,499,988	2,542,532
Change in net unrealized capital gains or (losses)	1,429,834	1,252,931	133,712	913,582	941,601
Change in net deferred income tax	179,509	22,974	239,088	138,812	(24,782)
Change in non-admitted assets	(3,315)	335,568	(325,498)	45,051	30,570
Change in provision for reinsurance	160,827	(176,256)	163,000	(282,569)	15,179
Dividends to stockholders				(2,500,000)	(1,500,000)
Change in surplus as regards to policyholders	1,282,622	2,506,282	2,189,158	814,864	2,005,100
Capital and Surplus December 31, current year	$35,963,718	$34,681,096	$32,174,814	$29,985,656	$29,170,792

ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS

Total Capital and Surplus	$35,963,718

Total capital and surplus, as established by this examination, is the same as reported by the Company in its 2024 Annual Statement. There were no changes made to any asset or liability items as a result of our examination performed as of December 31, 2024.

COMMENTS AND RECOMMENDATIONS

The following list presents a summary of comments and recommendations noted in this report:

Comments

1. The Company was only able to provide a signed Conflict of Interest statement for three (3) of the eight (8) total directors and officers (per the jurat page) in place as of December 31, 2024. Additionally, the Company was unable to provide a signed Conflict of Interest statement from any officer or director for any other year of the exam period. Per Tenn. Code Ann. § 56-3-103, conflicts of interest involving company directors or officers are strictly prohibited.

   It is recommended that the Company ensure that directors and officers are free from any conflicts of interest by requiring signed Conflict of Interest statements annually.

Recommendations

1. A review of the meeting minutes of the Board and shareholders of the Company found that the Company's shareholders did not hold annual meetings for the election of directors in accordance with its Bylaws and Tenn. Code Ann. § 48-17-101 for the following years under examination: 2020, 2021, 2023, and 2024.

   It is recommended that the Company ensure that its shareholders meet annually for the election of the directors in accordance with its Bylaws and Tenn. Code Ann. § 48-17-101.

2. The Company did not enter into a formal custody agreement with Polen Capital that meets the requirements of Tenn. Comp. R. & Regs. 0780-01-46-.02. Additionally, this transaction did not receive authorization from the Board. Per Tenn. Comp. R. & Regs. 0780-01-46-.02(2), custody agreements should be in writing and authorized by the Board or an authorized committee thereof.

It is recommended that the Company ensure that all custodial agreements are in compliance with Tenn. Comp. R. & Regs. 0780-01-46-.02.

3. It was found that certain claim and application forms utilized by the Company during the examination period did not contain the following statement, or one to that effect, as required by Tenn. Code Ann. § 56-53-111:
   "It is a crime to knowingly provide false, incomplete or misleading information to an insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits."

   It is recommended that the Company update its claim and application forms to include the fraud warning statement as required by Tenn. Code Ann. § 56-53-111.

4. The Instructions require the Appointed Actuary to report to the Board or the Audit Committee each year on the items within the scope of the Actuarial Opinion. The Instructions state that the minutes of the Board shall indicate that the Appointed Actuary has presented such information to the Board or the Audit Committee. Per review of the Board minutes for the Company and its parent, PGI, there was no documentation of review by the Board of the actuaries' annual report and findings in 2022. This is a repeat finding from the prior examination.

   It is recommended the Board receive and review the actuaries' annual report and findings and document the review in the meeting minutes in accordance with the Instructions.

CONCLUSION

Rules and procedures as prescribed by the statutes of the State of Tennessee and guidance from the NAIC Handbook, as deemed appropriate, have been followed in connection with the verification and valuation of assets and the determination of liabilities of Plateau Casualty Insurance Company.

In such manner, it was found that as of December 31, 2024, the Company had admitted assets of $78,379,542 and liabilities, exclusive of capital and surplus, of $42,415,824. Thus, there existed for the additional protection of the policyholders, the amount of $35,963,718 in the form of common capital stock, gross paid in and contributed surplus, and unassigned funds. Tenn. Code Ann. §§ 56-2-114 and 56-2-115 require an insurer of this Company's type to maintain a minimum capital of $1,000,000 and minimum surplus of $1,000,000. For this examination, as of December 31, 2024, the Company maintains capital and surplus sufficient to satisfy those requirements.

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

In addition to the undersigned, James Menck, CFE, CPA, Melissa Gibson, CFE, Kristina Sampson, Rick Nelson, CFE, CIE, MCM, Stefan Obereichholz-Bangert, AES, CISA, CISM, CDPSE, and Michael Nadeau, CISA, CFE, CPA, AES of Noble Consulting Services, Inc., participated in the work of this examination. An actuarial review was performed by Mary Francis Miller, FCAS, MAAA, FCA, of Select Actuarial Services.

Respectfully submitted,

Shelby Lambert
Shelby Lambert (Jun 15, 2026 10:03:38 EDT)

Shelby Lambert, CFE, CIE, MCM
Examiner-in-Charge
Noble Consulting Services, Inc.
Representing the State of Tennessee

Don Karnes

Don Karnes, CFE, MCM
Department Designee
State of Tennessee

CERTIFICATION

The undersigned certifies and says that she has duly executed the attached examination report of Plateau Casualty Insurance Company located in Crossville, Tennessee, dated May 21, 2026, and made as of December 31, 2024, on behalf of the Tennessee Department of Commerce and Insurance. The undersigned further says she is familiar with such instrument and the contents thereof, and the facts therein set forth are true to the best of her knowledge, information, and belief.

Shelby Lambert
Shelby Lambert (Jun 15, 2026 10:03:38 EDT)

Shelby Lambert, CFE, CIE, MCM
Examiner-in-Charge
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Don Karnes

Don Karnes, CFE, MCM
Department Designee
State of Tennessee

EXHIBIT B

LUMOS INSURANCE

June 17, 2026

Bryant Cummings
Director of Financial Examinations/Chief Examiner
Tennessee Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, TN 37243-1135

RE: **Report of Examination – Plateau Casualty Insurance Company**

Dear Mr. Cummings:

We hereby acknowledge receipt of the final Report of Examination for Plateau Insurance Company, made as of December 31, 2024.

By signing below, we indicate acceptance of the report, as transmitted, without rebuttal.

Sincerely,

Michael J. Morris
General Counsel & Corporate Secretary

cc: Vincent L. Bodnar, President
Tracy Graham, Treasurer