



STATE OF TENNESSEE
DEPARTMENT OF COMMERCE AND INSURANCE

REPORT ON EXAMINATION
OF
U.S. LEGAL SERVICES, INC.

(NAIC # 14689)

JACKSONVILLE, FLORIDA

AS OF
SEPTEMBER 30, 2013
and
DECEMBER 31, 2013



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Jacksonville, Florida
March 23, 2015

Honorable Julie Mix McPeak
Commissioner
Tennessee Department of Commerce & Insurance
Davy Crockett Tower, 12th floor
500 James Robertson Parkway
Nashville, Tennessee 37243-0565

Dear Commissioner:

Pursuant to your instructions and in accordance with Tenn. Code Ann. § 56-1-408, regulations and resolutions adopted by the National Association of Insurance Commissioners (NAIC), a full-scope individual financial examination and market conduct review as of September 30, 2013, and updated through December 31, 2013, has been made of the condition and affairs and of:

U.S. Legal Services, Inc.
NAIC # 14689
8133 Baymeadows Way
Jacksonville, Florida 32256

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

INTRODUCTION

This examination was arranged by the Commissioner of the Tennessee Department of Commerce and Insurance (TDCI), commenced on October 6, 2014, and was conducted by duly authorized representatives of the TDCI.

SCOPE OF EXAMINATION

The last examination of the Company was completed as of September 30, 2008. This examination report covers the period from October 1, 2008, through September 30, 2013 and was updated through December 31, 2013, and includes any material transactions and/or events occurring subsequent to the examination date and noted during the course of the examination. This examination was updated through December 31, 2013, to bring the Company's examination schedule into conformity with its financial reporting cycle.

The examination was conducted in accordance with the NAIC *Financial Condition Examiners Handbook* and practices and procedures of the TDCI. The examination was planned to evaluate the financial condition of 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, management's compliance with Statutory Accounting Principles and annual statement instructions, when consistent with Tennessee statutes and regulations.

Our examination included a review of the Company's business policies and practices, management and corporate matters, a verification and evaluation of assets and a determination of the existence of liabilities. In addition, our examination included tests to provide reasonable assurance that the Company was in compliance with applicable laws, rules and regulations. In planning and conducting our examination, we gave consideration to the concepts of materiality and risk, and our examination efforts were directed accordingly.

The Company was audited during calendar years 2011 and 2013 by the independent public accounting firm of Carr, Riggs & Ingram, LLC (CRI) during 2014. The firm expressed an unqualified opinion on the Company's financial statements. We reviewed the work papers prepared by the independent public accounting firm related to the audit for the year ended December 31, 2013, and relied thereon to the extent practicable. Consequently, we performed only minimal testing for this period and directed our efforts to those areas not covered by the firm's audit.

COMPLIANCE WITH PREVIOUS EXAMINATION FINDINGS

Our examination included a review to determine the current status of the comments and recommendations in our previous Report on Examination dated September 30, 2008, which covered the period from October 1, 2003, through September 30, 2008.

The Company was directed to comply with Tenn. Code Ann. § 56-43-107 by submitting any management service agreements to the Commissioner for approval prior to entering the agreement.

We determined that the Company had satisfactorily addressed this item.

COMPANY HISTORY

The Company was incorporated on November 5, 2002, under the Tennessee Business Corporation Act as a for-profit legal insurance company. On March 12, 2003, the Company was issued a Certificate of Authority to transact the business of legal insurance pursuant to Tenn. Code Ann. § 56-43-101, et seq. The Company commenced business on April 1, 2003. The business purpose was to provide pre-paid legal insurance pursuant to Tenn. Code Ann., Title 56.

The Company's statutory address at incorporation was 220 West Wind Drive, Newbern, Tennessee. On May 8, 2006, the Company changed the statutory address to 8825 Perimeter Park Boulevard, Suite 102, Jacksonville, Florida. The Company's current location is 8133 Baymeadows Way, Jacksonville, Florida.

The Company changed its legal name from U.S. Legal Services of Tennessee, Inc. to U.S. Legal Services, Inc. by a charter amendment on August 13, 2013. A Certificate of Authority reflecting the new name was issued on November 26, 2013.

Dividends

The Board of Directors has the ability to make distributions to shareholders by dividends from surplus. Dividends approved by the Board of Directors and paid during the period under review were as follows:

2013	\$81,936
2012	\$172,280
2011	\$275,065
2010	\$191,065
2009	\$94,202
2008	\$62,697

Capital Contributions

On December 11, 2013, the TDCI approved a Charter amendment to increase the par value of the common stock from \$100 to \$600 per share.

MANAGEMENT AND CONTROL

MANAGEMENT

Management of the Company is vested in a Board of Directors elected annually. In accordance with the bylaws, the Board shall consist of at least three (3) members, and

not more than seven (7) members. The following persons were duly elected and serving as members of the Company's Board of Directors at September 30, 2013:

<u>Name</u>	<u>Business Address</u>
Marie Mustakas Forbes	7838 Woodsdale Lane Jacksonville, Florida 32256
Julia Anne-Marie Hulseley	7954 Mount Ranier Drive Jacksonville, Florida 32256
Jack Theis	4101 Donnington Drive Plano, Texas 75093

Annual meetings of the Board of Directors are held each year at the principal place of business of the Corporation. The time and date of the meetings shall be designated by resolution by the Board of Directors. Written notice of special meetings of the Board of Directors shall be given to each director by mail delivery at least two (2) days before the meeting.

The bylaws of the Company instruct the Board of Directors to appoint the officers and assistant officers of the Corporation from time to time. Each officer shall serve until a successor is chosen by the directors.

The following persons were serving as the Company's officers as of September 30, 2013:

<u>Name</u>	<u>Title</u>
Marie Mustakas Forbes	President
Julia Anne-Marie Hulseley	Secretary
Marie Mustakas Forbes	Treasurer

The Board of Directors installed committees to provide oversight for the affairs of the Company. The Board of Directors appointed the following Committees:

Audit Committee

Marie Mustakas Forbes	President, Treasurer, Director
Julia Anne-Marie Hulseley	Secretary, Director
Jack Theis	Director

CONFLICTS OF INTEREST AND PECUNIARY INTEREST

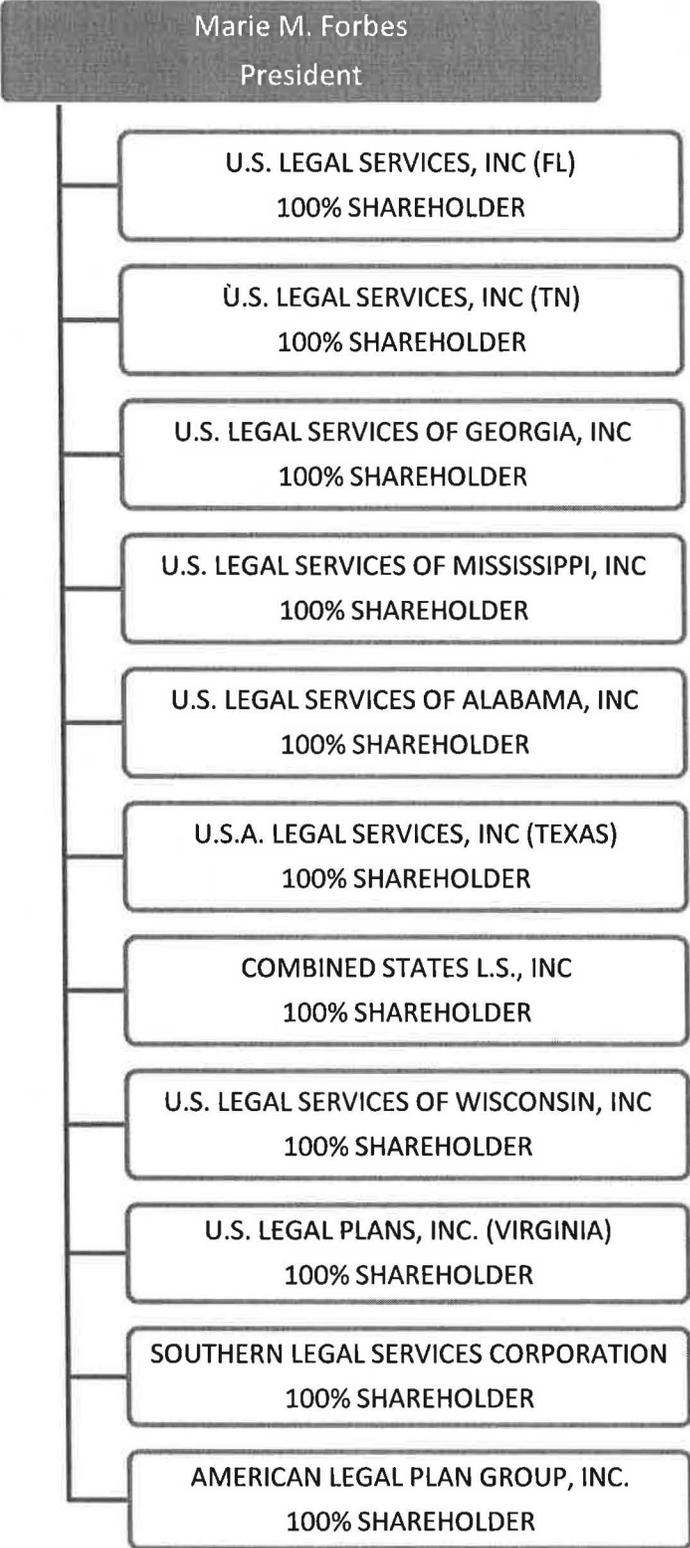
The Company has a Conflict of Interest Policy and a Code of Ethics which is intended to govern the actions of all directors, officers and employees. These persons file annual conflict of interest questionnaires. No conflicts were noted in the review of the signed questionnaires.

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

CONTROL

Primary control of the Company is vested with Marie M. Forbes. All stock is owned by Marie M. Forbes.

ORGANIZATIONAL CHART



CORPORATE GOVERNANCE

Corporate Governance is the system by which business corporations are directed and controlled. During our examination, we reviewed the Company's corporate governance function, including the Company's risk management processes.

Risks are identified by the Board of Director members and Company officers. The Company's risk management process contains open communication between the Company's Board members, officers and employees. Timely reporting was observed. These procedures allow management to make informed business decisions. Results from the process produce reporting and monitoring of the identified risks, as well as developing mitigation plans, when necessary.

CORPORATE RECORDS

Charter

The Charter recites general and specific powers of the Company in detail. The Charter, as currently stated, was inspected and found to have been duly issued and properly recorded. During the period of examination, the Charter was amended for a name change.

Bylaws

The bylaws were reviewed and found to contain key provisions noted within insurance companies. The bylaws may be amended or repealed, or new bylaws may be drafted and adopted by a majority vote of the Board of Directors or by a vote of the shareholders holding a majority of the shares.

Corporate Minutes

The minutes of the meetings of the Board of Directors, the committees of the Board of Directors, and various documentation were reviewed for the period under examination. The minutes of meetings of the Board of Directors' committees for the current examination period appear to properly document and support significant transactions and events of the Company.

SERVICE AGREEMENTS

The Company uses servicing agencies to perform some of the functional duties of an insurance company.

SERVICE AGREEMENT

The Company contracts with U.S. Legal Services, Inc. (a Florida Corporation), an affiliate, to provide administrative responsibilities. Claims administration and quality control are provided. TDCI approved the agreement on January 28, 2011.

ACTUARIAL SERVICES

Merlinos & Associates, Inc. provides actuarial rate level support, forms and rate filings, annual reserve review and opinion, and consultation throughout the year on reserve and rate level issues, as needed. This contract renews annually.

ACCOUNTING SERVICES

Farmand, Farmand, and Farmand, LLP provides accounting services related to regulatory filings including review of statutory annual statements, NAIC filings, payment of premium taxes, and federal income tax filings.

LEGAL SERVICES AGREEMENTS

The Company uses a "retain as needed" attorney network to provide legal services. Services are provided in the United States or Canada where the policyholder's violation occurred or where legal service is requested. U.S. Legal Services, Inc. locates an attorney in that local area and arranges for individual representation and payment. A contact is made with the local attorney which includes a negotiated price and payment upon completion of the services. First, the Company secures a verbal agreement with the attorney. Second, the contract is sent. Third, the attorney signs the contract. And finally, after the signed contract is received, the Company notifies the policyholder of the attorney retained to provide for their legal representation. The Company maintains and reuses this network of attorneys who have previously provided legal services.

FIDELITY BOND AND OTHER INSURANCE

The Company has a Crime Policy and Professional Liability Insurance Policy. The Company's fidelity insurance coverage is below the minimum requirements suggested by the NAIC, which is in the range of \$50,000 to \$75,000 for a company of this size. The Company has additional coverage provided by a Miscellaneous Professional Liability policy of \$1,000,000 each claim / aggregate limit.

TERRITORY AND PLAN OF OPERATION

As of December 31, 2013, and as of the date of this examination report, the Company was licensed to transact business in the states of Arizona, Tennessee and Utah. The Certificate of Authorities for those jurisdictions were reviewed.

During 2013, the Company wrote direct written premium in two (2) states as follows:

Arizona	\$318,720	29.0%
Tennessee	<u>778,588</u>	<u>71.0%</u>
Total	<u>\$1,097,308</u>	<u>100.0%</u>

INSURANCE PRODUCTS AND RELATED PRACTICES

The Company currently markets two products in Tennessee, the C.D.L. (Commercial Driver's License) Defender Plan and the Family Defender Plan. CDL Defender Plans are offered individually or through a sponsor. The sponsor is a person, business, or motor carrier that offers the plan to their employees or owner operators. The Family Defender Plan is only offered through a sponsor.

The CDL Defender Plan is designed to provide legal expense insurance and is available primarily for the commercial driver. The services are provided by Company designated attorneys. The CDL Defender coverage provides:

- Consultation benefits
- Non-moving violations and Department of Transportation violations
- Divorce
- Reduced rates for pre-existing matters and other services
- Moving violations
- Major accident representation
- Wills
- Administrative hearings

The Family Defender Plan is designed to provide legal expense insurance and is available for policyholders and their families. The services are provided by Company designated attorneys. The Defender coverage provides:

- Consultation benefits
- Personal injury
- Civil Lawsuits
- Estate planning
- Adoption and Legitimization
- Consumer-Seller protection
- Criminal matters
- Document preparation and review
- Family Law
- Guardianship or Conservatorship

- Name Change
- Real Estate Transactions
- Traffic violations
- Juvenile matters
- Business law
- Insurance Law
- Landlord/Tenant Law
- Financial matters
- Immigration
- Trial Supplement

All policies are automatically renewed at the end of each membership year unless the policyholder cancels prior to the renewal date or fails to make payment on a timely basis.

GROWTH OF COMPANY

The following comparative data reflected the growth of the Company for the period under review:

<u>Year</u>	<u>Direct Premiums Written</u>	<u>Net Admitted Assets</u>	<u>Liabilities</u>	<u>Net Income</u>	<u>Policyholder Surplus</u>
2013	\$1,097,308	\$1,845,590	\$117,937	\$101,063	\$1,727,653
2012	\$891,777	\$1,122,544	\$76,493	\$144,092	\$1,046,051
2011	\$915,149	\$778,770	\$77,283	\$290,112	\$701,487
2010	\$1,086,112	\$797,509	\$114,037	\$416,148	\$683,474
2009	\$823,309	\$544,751	\$96,182	\$156,985	\$448,569
2008	\$799,861	\$514,180	\$116,322	\$140,846	\$397,858

LOSS EXPERIENCE

The following comparative data reflected the loss experience of the Company for the period under review:

	Premiums Earned	Losses Incurred	Other Underwriting Expenses Incurred	Net Loss Ratio
2013	\$1,094,777	\$211,978	\$795,394	92.02%
2012	\$891,285	\$186,955	\$572,041	85.16%
2011	\$914,325	\$173,527	\$460,388	69.33%
2010	\$1,082,540	\$227,575	\$449,224	62.52%
2009	\$823,309	\$177,060	\$500,646	82.31%
2008	\$799,861	\$206,323	\$467,453	84.24%

ACCOUNTS AND RECORDS

The Company's general accounting records consisted of an automated general ledger and various subsidiary ledgers (e.g., cash receipts, cash disbursements). Our review did not disclose any deficiencies in these records.

Accounting records conformed to statutory accounting practices and procedures as reflected within the Company's operations during the period under examination and the status of the Company at the date of examination.

The Company began being audited annually by CRI, Birmingham, Alabama during 2013. No violations were noted with respects to Tenn. Comp. R. & Reg., 0780-1-65-.07(3).

The Company's Risk-Based Capital Report was reviewed and found to be in compliance with Tenn. Code Ann. § 56-46-101, et seq.

STATUTORY DEPOSITS

In compliance with Tenn. Code Ann. § 56-2-104, the Company maintained the following deposits with the TDCI, as of September 30, 2013, and December 31, 2013:

<u>Description</u>	<u>Statement Value</u>	<u>Market Value</u>
Jacksonville Bank		
Certificate of Deposit – 106535 - 0.30% - matures 11/18/2014	\$104,200	\$104,200
Certificate of Deposit – 108496 - 0.50% - matures 06/18/2015	<u>200,401</u>	<u>200,401</u>
Total special deposits held for the benefit of all policyholders of the Company	<u>\$304,601</u>	<u>\$304,601</u>

COMMITMENTS AND CONTINGENCIES

No financially material commitments and contingencies were reported by the Company or its auditors, other than matters arising out of the normal course of business.

MARKET CONDUCT ACTIVITIES

A market conduct review was made of the Company as of September 30, 2013, and December 31, 2013, in conjunction with this examination. The following items were addressed:

Policy Forms and Filings

A sample of Company policy rate and form filings was reviewed and found to be in compliance with Tenn. Code Ann. § 56-5-306, which requires a filing to be made with the Commissioner not later than fifteen (15) days after the effective date for all rates, supplementary rate information, policy forms and endorsements. The policy rates and forms in the sample were traced without exception to active insurance policies examined during the underwriting portion of the examination. The Company's filings with the TDCI were consistent in form and well documented.

Underwriting and Rating

A sample of CDL Defender Plan policies was reviewed to confirm the Company's use of approved contract forms and premium rates. No exceptions were noted and the Company appears to be in compliance with Tenn. Code Ann. § 56-43-106. Since all applications for coverage are accepted by the Company if pre-payment is submitted, there is essentially no underwriting of potential policyholders. Coverage each month is generally provided in arrears and terminated upon non-payment. Although most policyholders purchase coverage as part of a group plan, the Company sends a welcome letter; a complete copy of the policy; and membership ID cards to each policyholder.

In the examination of the Company's underwriting procedures and policy administration, policy files were reviewed and found to be in accordance with statutory requirements of Tenn. Code Ann. § 56-8-104 and established Company guidance. No instances of unfair methods of competition or unfair or deceptive acts were found.

Advertising

The advertising items including print and internet materials issued by the Company were examined in accordance with Tenn. Code Ann. § 56-8-104(2) (False Information and Advertising). In the examination of the above materials, no incidents of misrepresentation or false advertising were found. The Company was also found to have strong controls in place for the production and use of all advertising materials with only company approved materials authorized for use.

Information relative to the Company is exhibited on their webpage address as follows:

<http://www.uslegalservices.net/>

Policyholder Complaints

The Company had no policyholder complaints filed with the Company based on the offered products for the period under examination. There were no complaints on file with the TDCI for the current year or on the NAIC Database since 2008.

The Company, however, tracks issues. An issue can be the status of pending court actions, lack of understanding of the policy coverage or the backlog in the court system. The Company maintains software that receives and tracks issues based upon pre-established time limits. A policyholder would call into the Company's Customer Service Team. The issue is entered in the Company's system. Each issue is monitored. Delinquent issues are reported to supervisors. Monitoring continues until resolution.

Upon a review of these Company-monitored issues, all files appear to capture the necessary information regarding the issue; provide sufficient details as to how the issue was resolved; and lists the final disposition date.

Claims Review

Generally, a claim is a policyholder's request for legal services after receiving a CDL ticket. Service is provided by a contracted attorney, local to where the CDL ticket was issued. The Company maintains a list of attorneys that have already agreed in principle to the Company's fee schedule.

In the examination of claims, it was found that the Company operates an efficient automated data processing system for the tracking and resolution of each claim. A review of claims shows evidence of follow-up and record updating occurring up until final disposition is received from the assigned attorney and the claim is closed.

Privacy of Non-Public Personal Information

The majority of the Company's policyholders are from commercial businesses. Tenn. Comp. R. & Regs. R. 0780-01-72, "Privacy of Consumer Information Regulations" limits the scope of the privacy rules as follows:

"These rules do not apply to information about companies or about individuals who obtain products or service for business, commercial or agricultural purposes."

FINANCIAL STATEMENTS

There follows a statement of assets, liabilities, and statement of revenue and expenses at September 30, 2013 and December 31, 2013, together with a reconciliation of reserves and unassigned funds for the period under review, as established by this examination:

	<u>ASSETS</u>					
	September 30, 2013			December 31, 2013		
	<u>Assets</u>	<u>Non Admitted Assets</u>	<u>Net Admitted Assets</u>	<u>Assets</u>	<u>Non Admitted Assets</u>	<u>Net Admitted Assets</u>
Bonds	\$509,480	\$0	\$509,480	\$509,801	\$0	\$509,801
Cash and short-term investments	<u>1,182,941</u>	<u>0</u>	<u>1,182,941</u>	<u>1,329,158</u>	<u>0</u>	<u>1,329,158</u>
Subtotals, cash and invested assets	1,692,421	0	1,692,421	1,838,959	0	1,838,959
Premiums and considerations:			0			0
Uncollected premiums and agents' balances in the course of collection	0	0	0	2,497	0	2,497
Receivable from parent, subsidiaries and affiliates	42,968	0	42,968	4,134	0	4,134
Aggregate write-ins for other than invested assets:						
Employee Advances	<u>11,915</u>	<u>11,915</u>	<u>0</u>	<u>7,537</u>	<u>7,537</u>	<u>0</u>
Totals	<u>\$1,747,304</u>	<u>\$11,915</u>	<u>\$1,735,389</u>	<u>\$1,853,127</u>	<u>\$7,537</u>	<u>\$1,845,590</u>

LIABILITIES, CAPITAL AND SURPLUS

	September 30, 2013	December 31, 2013
Losses	\$74,142	\$86,676
Other expenses (excluding taxes; licenses and fees)	10,292	17,681
Taxes; licenses and fees (excluding federal and foreign income taxes)	4,796	4,747
Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$994,951 and including warranty reserves of \$0 and accrued accident and health experience rating refunds including \$0 for medical loss ratio rebate per the Public Health Service Act)	6,853	7,419
Payable to parent, subsidiaries and affiliates	660	1,414
Total liabilities	96,743	177,937
Common capital stock	600,000	600,000
Gross paid in and contributed surplus	671,965	671,965
Unassigned funds (surplus)	366,381	455,688
Surplus as regards policyholders	1,638,646	1,727,653
Totals	\$1,735,389	\$1,845,590

STATEMENT OF INCOME

	<u>September 30, 2013</u>	<u>December 31, 2013</u>
Underwriting Income		
Premiums earned	\$735,239	\$1,094,777
Deductions		
Losses incurred	156,499	211,978
Other underwriting expenses incurred	585,351	795,394
Total underwriting deductions	741,850	1,007,372
Net underwriting gain (loss)	(6,611)	87,405
Investment Income		
Net investment income earned	5,438	6,846
Net investment gain (loss)	5,438	6,846
Other Income		
Finance and service charges not included in premiums	0	3,012
Aggregate write-ins for miscellaneous income	5,724	3,800
Total other income	5,724	6,812
Net income before dividends to policyholders	4,551	101,063
Dividends to policyholders	0	0
Net income; before all other federal and foreign income taxes	4,551	101,063
Federal and foreign income taxes incurred	0	0
Net income (loss)	<u>\$4,551</u>	<u>\$101,063</u>

RECONCILIATION OF CAPITAL AND SURPLUS

	<u>December 31 2013</u>	<u>September 30 2013</u>	<u>December 31 2012</u>	<u>December 31 2011</u>	<u>December 31 2010</u>	<u>December 31 2009</u>	<u>December 31 2008</u>	<u>September 30 2008</u>
Surplus as regards policyholders, December 31 prior year	<u>\$1,046,051</u>	<u>\$1,046,051</u>	<u>701,487</u>	<u>\$683,474</u>	<u>\$448,572</u>	<u>\$397,858</u>	<u>\$348,396</u>	<u>348,396</u>
Net income	101,063	4,551	144,092	290,112	416,148	156,985	140,846	101,649
Change in net unrealized capital gains or (losses)	933	612	(2,248)	(6,469)	7,503			
Change in nonadmitted assets	(7,537)	(11,915)		9,435	2634	(12,069)		
Capital changes			500,000					
Surplus adjustments	669,079	669,079	(125,000)					
Dividends to stockholders	<u>(81,936)</u>	<u>(69,723)</u>	<u>(172,280)</u>	<u>(275,065)</u>	<u>(191,383)</u>	<u>(94,202)</u>	<u>(91,384)</u>	<u>(62,697)</u>
Change in surplus as regards policyholders for the year	<u>681,602</u>	<u>592,595</u>	<u>344,561</u>	<u>18,013</u>	<u>234,902</u>	<u>50,714</u>	<u>49,462</u>	<u>17,983</u>
Surplus as regards policyholders, December 31 current year	<u>\$1,727,653</u>	<u>\$1,638,646</u>	<u>\$1,046,051</u>	<u>\$701,487</u>	<u>\$683,474</u>	<u>\$448,872</u>	<u>\$397,858</u>	<u>\$366,379</u>

ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS

Although minor differences were found within various items, none were considered to produce a material effect on surplus.

SUBSEQUENT EVENTS

Currently, the Company is in the testing phase with a new integrated computer system. This system will combine the accounting and the claims handling functions.

COMMENTS AND RECOMMENDATIONS

Comments:

The Company's fidelity insurance coverage is suggested to be at the minimum requirements suggested by the NAIC, which is in the range of \$50,000 to \$75,000 for a company of this size.

Recommendations:

None.

CONCLUSION

The customary insurance examination practices and procedures, as promulgated by the National Association of Insurance Commissioners, have been utilized in connection with the verification and valuation of assets and the determination of liabilities in the financial statements of this report.

In such manner, it was determined that, as of December 31, 2013, the Company had net admitted assets of \$1,845,590 and liabilities, exclusive of capital and surplus, of \$117,937. Thus, there existed for the additional protection of the Members, the amount of \$1,727,653 in the form of subscribers' capital accounts and unassigned funds.

Respectfully submitted,

A handwritten signature in blue ink that reads "Brian H Sewell". The signature is written in a cursive style and is positioned above a horizontal line.

Brian H Sewell, CFE
Examiner-in-Charge
State of Tennessee

AFFIDAVIT

The undersigned deposes and says that he has duly executed the attached examination report of U.S. Legal Services, Inc., dated March 23, 2015, and made as of September 30, 2013, and updated to December 31, 2013, on behalf of the Tennessee Department of Commerce and Insurance. 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.

Brian H. Sewell
Brian H. Sewell, CFE
Examiner-in-Charge
State of Tennessee
Southeastern Zone, NAIC

State Tennessee

County Davidson

Subscribed to and sworn before me
this 25th day of March, 2015

Notary Helen W. Dorsey

My Commission Expires: 11/06/2017





U.S. Legal Services

March 25, 2015

E. Joy Little
Director of Financial Examinations
Tennessee Department of Commerce and Insurance
500 James Robertson Parkway
Nashville, TN 37243

RE: U.S. Legal Services, Inc. – Report of Examination

Dear Ms. Little:

We hereby acknowledge receipt of the final Report of Examination for U.S. Legal Services, Inc. By signing below, we indicate acceptance of the report, as transmitted, and without rebuttal.

Sincerely,

Marie M. Forbes
President
U.S. Legal Services, Inc.

