

STATE OF INDIANA) BEFORE THE INDIANA
) SS:
COUNTY OF MARION) COMMISSIONER OF INSURANCE

IN THE MATTER OF:)
)
Citizens Insurance Company of the Midwest)
9229 Delegates Row, Suite 100)
Indianapolis, Indiana 46240-3824)

Examination of: **Citizens Insurance Company of the Midwest**

NOTICE OF ENTRY OF ORDER

Enclosed is the Final Order entered by Stephen W. Robertson, Commissioner of the Indiana Department of Insurance, after fully considering and reviewing the Verified Report of Examination of Citizens Insurance Company of the Midwest, any relevant examination work papers, and any written submissions or rebuttals. The Verified Report of Examination, as amended by the Final Order, has been adopted by the Commissioner.

Pursuant to Ind. Code § 27-1-3.1-12(b), within thirty (30) days of receipt of the Final Order, each director of Citizens Insurance Company of the Midwest shall file an affidavit with the Indiana Department of Insurance stating that he/she has received a copy of the Verified Report of Examination and the Final Order.

The Final Order is a final administrative decision that may be appealed pursuant to Ind. Code § 4-21.5-5.

June 1, 2021
Date


Roy Eft
Chief Financial Examiner

CERTIFIED MAIL NUMBER: 7018 1130 0001 7982 5973

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Examination of: **Citizens Insurance Company of the Midwest**

FINDINGS AND FINAL ORDER

The Indiana Department of Insurance conducted an examination into the affairs of the Citizens Insurance Company of the Midwest (hereinafter “Company”) for the time period January 1, 2015 through December 31, 2019.

The Verified Report of Examination was filed with the Commissioner of the Department of Insurance (hereinafter “Commissioner”) by the Examiner on March 5, 2021.

A copy of the Verified Report of Examination, along with a Notice of Opportunity to Make Written Submission or Rebuttal, was mailed to the Company via Certified Mail on May 7, 2021 and was received by the Company on May 18, 2021.

On May 19, 2021, pursuant to Ind. Code § 27-1-3.1-10, the Company filed a response to the Verified Report of Examination. The Commissioner has fully considered the Company’s response.

NOW THEREFORE, based on the Verified Report of Examination and the response filed by the Company, the Commissioner hereby FINDS as follows:

1. The suggested modifications to the Verified Report of Examination submitted by the Company are reasonable and shall be incorporated into the Verified Examination Report. A copy of the Verified Report of Examination, as amended, is attached hereto.

2. The Verified Report of Examination, as amended, is true and accurate report of the financial condition and affairs of the Company as of December 31, 2019.
3. The Examiners' recommendations are reasonable and necessary in order for the Company to comply with the insurance laws of the state of Indiana.

Based on the FINDINGS, the Commissioner does hereby ORDER:

1. Pursuant to Ind. Code § 27-1-3.1-11(a)(1), the Verified Report of Examination is adopted and shall be filed. Hereafter the Verified Report of Examination, as amended, may constitute prima facie evidence of the facts contained therein in any action or proceeding taken by the Indiana Department of Insurance against the Company, its officers, directors, or agents.
2. The Company shall comply with the Examiner's Recommendations enumerated in summary form and throughout the text of the Verified Report of Examination, as amended. A written response to these recommendations should be provided to the Department within 30 days of receipt of this order.
3. Compliance with the Examiner's recommendations shall be completed on or before the filing of the subsequent annual statement. In the event it is not feasible to comply with a recommendation before the filing of the subsequent annual statement, the Company shall submit a written explanation as to why it was not feasible with the filing of the annual statement.

Signed this 1 day of June, 2021.


Stephen W. Robertson
Insurance Commissioner

ABOUT AFFIRMATIONS

The following pages for affirmations need to be signed by each Board Member and returned to the Indiana Department of Insurance within thirty (30) days in accordance with I.C. §27-1-3.1-12(b).

If your affirmations list individuals that are no longer on your Board of Directors, you may simply retype the form on plain white paper with the correct names and a line to the right for signature. If the names are misspelled, you may do the same, simply re-type the corrected form with a line to the right for signature.

Should you have any questions or difficulties with these forms or you require additional time past the thirty (30) day requirement, please do not hesitate to contact this department at (317) 232-2390.

STATE OF INDIANA
Department of Insurance
REPORT OF EXAMINATION

OF

CITIZENS INSURANCE COMPANY OF THE MIDWEST

NAIC Co. CODE 10395
NAIC GROUP CODE 0088

As of

December 31, 2019

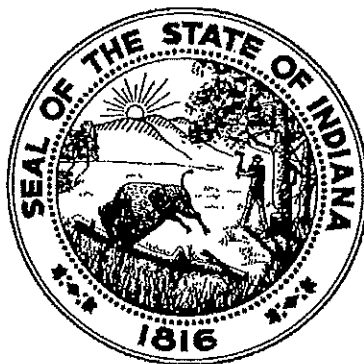


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March 5, 2021

Honorable Stephen W. Robertson, Commissioner
Indiana Department of Insurance
311 West Washington Street, Suite 300
Indianapolis, Indiana 46204-2787

Dear Commissioner:

Pursuant to the authority vested in Appointment Number 4040, an examination has been made of the affairs and financial condition of:

**Citizens Insurance Company of the Midwest
9229 Delegates Row, Suite 100
Indianapolis, Indiana 46240-3824**

hereinafter referred to as the "Company", or "CICM", an Indiana domestic stock, property and casualty insurance company. The examination was conducted at the corporate offices of the Company in Worcester, Massachusetts.

The Report of Examination, reflecting the status of the Company as of December 31, 2019, is hereby respectfully submitted.

SCOPE OF EXAMINATION

The Company was last examined by representatives of the Indiana Department of Insurance (INDOI) and covered the period from January 1, 2012 through December 31, 2014. The present risk focused examination was conducted by Noble Consulting Services, Inc., and covered the period from January 1, 2015 through December 31, 2019, and included any material transactions and/or events occurring subsequent to the examination date and noted during the course of this examination.

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

The examination of the New Hampshire domestic insurance companies of The Hanover Insurance Group, Inc. (THG) was called by New Hampshire Insurance Department (NHID) in accordance with the Handbook guidelines, through the NAIC's Financial Examination Electronic Tracking System. The NHID served as the lead state on the examination, and the Delaware Department of Insurance, Illinois Department of Insurance, INDOI, Michigan Department of Insurance and Financial Services, New York State Department of Financial Services, Ohio Department of Insurance, and Texas Department of Insurance served as participants. Merlinos & Associates, Inc. staff provided actuarial services throughout the examination and conducted a review of the Company's actuarial related risks as of December 31, 2019.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination an adjustment is identified, the impact of such adjustment will be documented separately following the Company's financial statements.

This examination report includes significant findings of fact, as in the Indiana Code (IC) 27-1-3.1-10, and general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not included within the examination report but separately communicated to other regulators and/or the Company.

HISTORY

The Company was incorporated under the laws of the state of Indiana on September 1, 1994, and commenced business on March 8, 1996. Until December 31, 2000, the Company was a wholly-owned subsidiary of Citizens Corporation, a Delaware Company. On December 31, 2000, Citizens Corporation was dissolved and the ownership of its subsidiaries was transferred to The Hanover Insurance Company (HIC). HIC owns all outstanding shares of the Company and is wholly owned by Opus Investment Management, Inc. (Opus). Opus is wholly owned by THG, a publicly traded entity incorporated in Delaware.

CAPITAL AND SURPLUS

The Company has 400 shares of \$5,000 par value common stock authorized and 400 shares issued and outstanding. On December 17, 2019, the Company received a capital contribution of \$12,000,000 from HIC. The contribution was settled in bonds at a fair value of \$11,781,006, accrued interest of \$101,170, and cash in the amount of \$117,824. On December 14, 2018, the Company received an \$8,500,000 capital contribution from HIC. The

contribution was settled in bonds at a value of \$8,415,468, accrued interest of \$68,470, and cash in the amount of \$16,062. On December 15, 2017, the Company received a \$5,000,000 capital contribution from HIC. The contribution was settled in bonds at a fair value of \$4,640,609, accrued interest of \$44,608, and cash in the amount of \$314,783. On December 16, 2016, the Company received a \$1,500,000 cash capital contribution from HIC. On December 10, 2015, the Company received a \$2,000,000 cash capital contribution from HIC.

TERRITORY AND PLAN OF OPERATION

The Company is only licensed in Indiana and Michigan and writes auto (liability and physical damage), homeowners' coverages, and workers' compensation through THG's independent agent network. Private passenger auto liability and physical damage make up more than 87% of the direct writings. Michigan makes up 98% of the direct premiums and Indiana makes up the remaining 2% direct premium. The Company is the lead personal automobile provider in the state of Michigan, within THG's holding company structure.

The Company cedes 100% of all direct premiums, direct losses, and direct loss adjustments to Citizens Insurance Company of America (CICA).

GROWTH OF THE COMPANY

The following exhibit summarizes the financial results of the Company during the examination period:

<u>Year</u>	<u>Admitted Assets</u>	<u>Liabilities</u>	<u>Surplus and Other Funds</u>	<u>Premiums Earned</u>	<u>Net Income</u>
2019	\$ 82,977,586	\$ 49,646	\$ 82,927,940	\$ 0	\$ 1,644,761
2018	69,318,781	28,517	69,290,264	0	1,360,286
2017	60,960,683	1,534,908	59,425,775	0	990,697
2016	53,475,907	52,656	53,423,251	0	1,009,697
2015	50,962,981	52,049	50,910,932	0	971,313

Net admitted assets and policyholders' surplus increased throughout the examination period due to capital contributions from the Company's parent, HIC, and net investment income. The increase in Liabilities for 2017 was primarily due to other liabilities which included \$1,494,958 of payable for securities due to the timing of investment purchases and settlements. These capital contributions were made to better align the policyholders' surplus with the amount of premiums written by the Company. Net investment income increased in 2018 and 2019 primarily due to the investment into higher yielding taxable bonds.

MANAGEMENT AND CONTROL

Directors

The Bylaws provide that the business affairs of the Company are to be managed by a Board of Directors (Board) consisting of no less than seven (7) and no more than twenty (20) directors. At least one (1) of the directors must be a resident of Indiana. The shareholders, at each annual meeting, elect the members of the Board.

The following is a listing of persons serving as directors as of December 31, 2019, and their principal occupations as of that date:

<u>Name and Address</u>	<u>Principal Occupation</u>
Warren Ellison Barnes Northborough, Massachusetts	Senior Vice President The Hanover Insurance Company
Mark Leo Berthiaume Glastonbury, Connecticut	Executive Vice President The Hanover Insurance Company
Daniel Scott Couger Lebanon, Indiana	Regional Vice President of Commercial Lines The Hanover Insurance Company
Jeffrey Mark Farber Stamford, Connecticut	Executive Vice President and Chief Financial Officer The Hanover Insurance Company
J. Kendall Huber Sudbury, Massachusetts	Executive Vice President and General Counsel The Hanover Insurance Company
Denise Maureen Lowsley Greenwich, Connecticut	Executive Vice President The Hanover Insurance Company
John Conner Roche Hopkinton, Massachusetts	President The Hanover Insurance Company
Bryan James Salvatore Rye Brook, New York	Executive Vice President The Hanover Insurance Company
Ann Kirkpatrick Tripp Rutland, Massachusetts	Executive Vice President, Chief Investment Officer, and Treasurer The Hanover Insurance Company
Mark Joseph Welzenbach Ellington, Connecticut	Executive Vice President The Hanover Insurance Company

Officers

The Bylaws state that the elected officers of the Company shall consist of a President, a Treasurer, a Secretary, and such Vice Presidents, other Secretaries, Assistant Treasurers, Assistant Secretaries, and other officers with such titles as may from time to time be determined by the directors, including a Chairman of the Board, and a Vice Chairman of the Board. The President, Treasurer, and Secretary shall hold office until the first meeting of the directors following the annual meeting of stockholders, or any special meeting held in lieu thereof, and thereafter until their successor is chosen and qualified, or until their resignation or removal.

Other officers shall hold office until the first meeting of the directors following the annual meeting of stockholders, or any special meeting held in lieu thereof, unless a shorter term is specified in the vote choosing or appointing them, or until their resignations or removal.

CITIZENS INSURANCE COMPANY OF THE MIDWEST
Capital and Surplus Account Reconciliation

	2019	2018	2017	2016	2015
Surplus as regards policyholders, December 31 prior year	\$ 69,290,264	\$ 59,425,775	\$ 53,423,251	\$ 50,910,932	\$ 47,944,843
Net income	1,644,761	1,360,286	990,697	1,009,697	971,313
Change in net deferred income tax	(7,085)	4,203	11,827	2,622	(5,224)
Capital changes:					
Paid in	12,000,000	8,500,000	5,000,000	1,500,000	2,000,000
Change in surplus as regards policyholders for the year	13,637,676	9,864,489	6,002,524	2,512,319	2,966,089
Surplus as regards policyholders, December 31 current year	<u>\$ 82,927,940</u>	<u>\$ 69,290,264</u>	<u>\$ 59,425,775</u>	<u>\$ 53,423,251</u>	<u>\$ 50,910,932</u>

CITIZENS INSURANCE COMPANY OF THE MIDWEST
Statement of Income
For the Year Ended December 31, 2019

	<u>Per Examination*</u>
INVESTMENT INCOME	
Net investment income earned	2,053,249
Net realized capital gains (losses) less capital gains tax	17,122
Net investment gain (loss)	2,070,371
OTHER INCOME	
Net income, before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	2,070,371
Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes	2,070,371
Federal and foreign income taxes incurred	425,610
Net income	\$ 1,644,761

* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

CITIZENS INSURANCE COMPANY OF THE MIDWEST
Liabilities, Surplus and Other Funds
As of December 31, 2019

	Per Examination*
Losses	\$ -
Current federal and foreign income taxes on realized capital gains (losses)	18,584
Net deferred tax liability	24,075
Payable to parent, subsidiaries and affiliates	6,987
Total liabilities excluding protected cell liabilities	49,646
Total liabilities	49,646
Common capital stock	2,000,000
Gross paid in and contributed surplus	64,052,858
Unassigned funds (surplus)	16,875,082
Surplus as regards policyholders	82,927,940
Totals	\$ 82,977,586

* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

FINANCIAL STATEMENTS

CITIZENS INSURANCE COMPANY OF THE MIDWEST

Assets

As of December 31, 2019

	<u>Per Examination*</u>
Bonds	\$ 77,247,958
Cash, cash equivalents and short-term investments	5,203,989
Subtotals, cash and invested assets	<u>82,451,947</u>
Investment income due and accrued	525,639
Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts	<u>82,977,586</u>
Totals	<u>\$ 82,977,586</u>

* There were no adjustments to the as-filed financial statements, therefore the Annual Statement amounts agree to the examination amounts.

REINSURANCE

An amended and restated reinsurance agreement between CICM and CICA is in place whereby 100% of liabilities are ceded to CICA. A non-disapproval letter was received from the INDOI on December 20, 2007 and the amended and restated agreement was executed with an effective date of December 31, 2007.

ACCOUNTS AND RECORDS

The Company's accounting procedures, practices, account records, and supporting data were reviewed and tested to the extent deemed necessary. The trial balance prepared from the Company's general ledger for the year ended December 31, 2019, was agreed to the respective Annual Statements. The Annual Statements for the years ended December 31, 2015 through December 31, 2019, were agreed to each year's independent audit report without material exception. The Company's accounting procedures, practices, and account records were deemed satisfactory.

Service Agreement

Effective January 1, 2010, THG entered into a Revised Consolidated Service Agreement with CICM. Under the agreement, CICM will be charged the cost of the service provided or expenses paid by the entity providing the service or paying the expense. In addition, CICM will be charged a portion of the costs associated with activities that are performed for the good of CICM. HIC is the common payer for expenses. CICA resolves reinsurance transactions and pays HIC on behalf of the Company. The Company does not make direct payments to any other entity for transactions related to this agreement.

Investment Advisory Agreement

Effective January 1, 2006, first amendment effective October 1, 2007, and Second Amendment effective August 1, 2016, CICM entered into an Advisory Agreement with Opus, an affiliate. Pursuant to the agreement, Opus provides investment advisory services to CICM. Pursuant to this agreement, the Company paid \$72,920 Opus for investment advisory services during the year ending December 31, 2019.

Consolidated Federal Income Tax Allocation Agreement

Effective December 31, 2001, THG entered into a Consolidated Income Tax Agreement with CICM and its affiliates as amended to date. The federal income tax for all subsidiaries in the consolidated return of THG is calculated on a separate return basis. Any current tax liability is paid to THG. Tax benefits resulting from taxable operating losses or credits of THG's subsidiaries are reimbursed to the subsidiary when such losses or credits can be utilized on a consolidated return basis.

FIDELITY BOND AND OTHER INSURANCE

The Company protects itself against loss from any fraudulent or dishonest acts by any employees through a fidelity bond issued by Great American Insurance Company. The bond has an aggregate coverage limit of \$10,000,000. The fidelity bond is adequate to meet the prescribed minimum coverage specified by the NAIC.

The Company had additional types of coverage in-force as of December 31, 2019, including but not limited to business travel accident, commercial auto coverage, commercial general liability, cyber liability, employment practices liability, fiduciary liability, insurance company professional liability, investment adviser professional liability, management protection, property, service provider professional liability, umbrella, and workers' compensation and employers' liability.

PENSION, STOCK OWNERSHIP, AND INSURANCE PLANS

There were no pension, stock ownership, or insurance plans reported by the Company as of December 31, 2019.

SPECIAL AND STATUTORY DEPOSITS

The Company reported the following deposits, as of December 31, 2019:

<u>State</u>	<u>Book Value</u>	<u>Fair Value</u>
For All Policyholders:		
Indiana	\$ 298,880	\$ 303,387
All Other Special Deposits:		
Aggregate Alien and Other	696,859	736,114
Total Deposits	<u>\$ 995,739</u>	<u>\$ 1,039,501</u>

For fiscal year 2015, the annual meeting of shareholders was not held within five (5) months following the close of each fiscal year, as required by IC 27-1-7-7(b). The noncompliance with IC 27-1-7-7(b) for the year ending December 31, 2015 was before THG had put in place procedures to assure that on a going forward basis, the CICM Annual Meeting of the Stockholders would take place within five (5) months after each fiscal year to comply with IC 27-1-7-7b. The examiners determined that the Company's annual meeting of shareholders were held within five (5) months following the close of each of the fiscal years 2016 through 2019, in compliance with the requirements of IC 27-1-7-7(b).

The Company's Board Committees, with the exception of the Investment Committee, exist at THG. THG Board Committee meeting minutes for the examination period, and through the fieldwork date, were reviewed for the following committees: Audit Committee, Committee of Independent Directors, Compensation Committee, Investment Committee, and Nominating and Corporate Governance Committee.

AFFILIATED COMPANIES

Organizational Structure

The following abbreviated organizational chart shows the Company's parent and affiliates as of December 31, 2019:

	<u>NAIC Co. Code</u>	<u>Domiciliary State/Country</u>
The Hanover Insurance Group, Inc. (THG)		DE
Opus Investment Management, Inc. (Opus)		MA
Citizens Insurance Company of Illinois (CII)	10714	IL
The Hanover Insurance Company (HIC)	22292	NH
Allmerica Financial Alliance Insurance Company (AFA)	10212	NH
Allmerica Financial Benefit Insurance Company (AFB)	41840	MI
Campmed Casualty & Indemnity Company, Inc. (CCI)	12260	NH
Citizens Insurance Company of the Midwest (CICM)	10395	IN
Citizens Insurance Company of America (CICA)	31534	MI
Citizens Insurance Company of Ohio (CIO)	10176	OH
Massachusetts Bay Insurance Company (MBI)	22306	NH
NOVA Casualty Company (NCC)	42552	NY
AIX Specialty Insurance Company (AIX)	12833	DE
The Hanover American Insurance Company (HAI)	36064	NH
The Hanover Casualty Company (HCC)	41602	TX
The Hanover National Insurance Company (HNI)	13147	NH
The Hanover New Jersey Insurance Company (HNJ)	11705	NH
Verlan Fire Insurance Company (VFI)	10815	NH

Affiliated Agreements

The following affiliated agreements and transactions were disclosed as part of the Form B – Holding Company Registration Statement and were filed with the INDOI, as required, in accordance with IC 27-1-23-4.

The following is a list of key officers and their respective titles as of December 31, 2019:

<u>Name</u>	<u>Office</u>
John Conner Roche	President
Ann Kirkpatrick Tripp	Treasurer and Executive Vice President
Charles Frederick Cronin	Secretary
Mark Leo Berthiaume	Executive Vice President
Jeffrey Mark Farber	Executive Vice President and Chief Financial Officer
J. Kendall Huber	Executive Vice President and General Counsel
Richard William Lavey	Executive Vice President
Denise Maureen Lowsley	Executive Vice President
Bryan James Salvatore	Executive Vice President
Mark Joseph Welzenbach	Executive Vice President

CONFLICT OF INTEREST

Directors and officers are required to review and sign Conflict of Interest statements annually. It was determined that all directors and officers listed in the Management and Control section of this Report of Examination have reviewed and signed their statements as of December 31, 2019.

OATH OF OFFICE

Indiana Code 27-1-7-10(i) stipulates that every director, when elected, shall take and subscribe to an oath stating that he or she will faithfully, honestly, and diligently administer the affairs of the Company and will not knowingly violate any of the laws applicable to such Company. It was determined that all directors listed in the Management and Control section of this Report of Examination have subscribed to an oath as of December 31, 2019.

CORPORATE RECORDS

Articles of Incorporation

There were no amendments made to the Articles of Incorporation during the examination period.

Bylaws

There were no amendments made to the Bylaws during the examination period.

Minutes

The Board and shareholders meeting minutes were reviewed for the period under examination through the fieldwork date. Significant actions taken during each meeting were noted.

Indiana Code 27-1-7-7(b) states an annual meeting of shareholders, members, or policyholders shall be held within five (5) months after the close of each fiscal year of the Company and at such time within that period as the Bylaws may provide. The Company's Bylaws specify that the annual meeting of shareholders shall be held on the third Thursday in April in each year or on such other date as may be fixed from time to time by the directors.

COMMENTS ON THE FINANCIAL STATEMENTS

There were no recommended adjustments to the financial statements as of December 31, 2019, based on the results of this examination.

OTHER SIGNIFICANT ISSUES

There were no other significant issues requiring disclosure in this Report of Examination.

SUBSEQUENT EVENTS

In March 2020, the World Health Organization declared Coronavirus disease (COVID-19) a pandemic. As of the date of this report, there was significant uncertainty on the effect that the pandemic would have on the insurance industry, economy, and society at large. Any impact to the Company will take time to assess and will be specific to the class and mix of business they underwrite. The Department will continue to monitor how the pandemic might impact the Company.

AFFIDAVIT

This is to certify that the undersigned is a duly qualified Examiner-in-Charge appointed by the Indiana Department of Insurance and that he, in coordination with staff assistance from Noble Consulting Services, Inc., and actuarial assistance from Merlinos & Associates, Inc., performed an examination of Citizens Insurance Company of the Midwest, as of December 31, 2019.

The Indiana Department of Insurance is accredited under the National Association of Insurance Commissioners Financial Regulation Accreditation Standards.

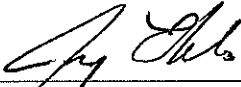
This examination was performed in accordance with those procedures required by the NAIC Financial Condition Examiners Handbook and other procedures tailored for this examination. Such procedures performed on this examination do not constitute an audit made in accordance with generally accepted auditing standards and no audit opinion is expressed on the financial statements contained in this report.

The attached Report of Examination is a true and complete report of condition of Citizens Insurance Company of the Midwest as of December 31, 2019, as determined by the undersigned.



Pyong Yong Landoll, CFE
Noble Consulting Services, Inc.

Under the Supervision of:



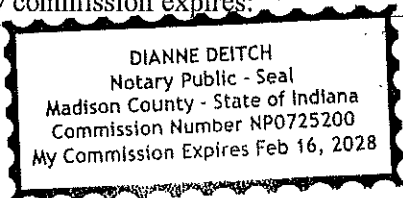
Jerry Ehlers, CFE, AES
Examinations Manager
Indiana Department of Insurance

State of: Indiana
County of: Marion

On this 24 day of March, 2021, before me personally appeared, Pyong Landoll and Jerry Ehlers, to sign this document.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal in said County and State, the day and year last above written.

My commission expires: February 16, 2028



Notary Public



Notary Public

