MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

MARK HAIRE
Deputy Commissioner of Insurance

RICKY DAVIS
State Chief Deputy Fire Marshal

MISSISSIPPI INSURANCE DEPARTMENT

501 N. WEST STREET, SUITE 1001
WOOLFOLK BUILDING
JACKSON, MISSISSIPPI 39201
www.mid.ms.gov

MAILING ADDRESS
Post Office Box 79
Jackson, Mississippi 39205-0079
TELEPHONE: (601) 359-3569
FAX: (601) 359-2474

June 10, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Scott Intravia, President & CEO
Magna Insurance Company
711 East Imperial Way, Suite 100
Brea, CA 92821

RE: Report of Examination as of December 31, 2013

Dear Mr. Intravia:

In accordance with Miss. Code Ann. § 83-5-201 et seq. (Rev. 2011), an examination of your Company has been completed. Enclosed herewith is the Order adopting the report and a copy of the final report as adopted.

Pursuant to Miss. Code Ann. § 83-5-209(6)(a) (Rev. 2011), the Mississippi Department of Insurance shall continue to hold the content of said report as private and confidential for a period of ten (10) days from the date of the Order. After the expiration of the aforementioned 10-day period, the Department will open the report for public inspection.

If you have any questions or comments, please feel free to contact me.

Sincerely,

MIKE CHANEY
COMMISSIONER OF INSURANCE

BY Christina J. Kelsey
Christina J. Kelsey
Senior Attorney

MC/CJK/bs
Encls. Order w/exhibit

BEFORE THE COMMISSIONER OF INSURANCE
OF THE STATE OF MISSISSIPPI

IN RE: REPORT OF EXAMINATION OF MAGNA INSURANCE COMPANY — **CAUSE NO. 15-6869**

ORDER

THIS CAUSE came on for consideration before the Commissioner of Insurance of the State of Mississippi ("Commissioner"), or his designated appointee, in the Offices of the Commissioner, 1001 Woolfolk Building, 501 North West Street, 10th Floor, Jackson, Hinds County, Mississippi, pursuant to Miss. Code Ann. § 83-5-201 et seq. (Rev. 2011). The Commissioner, having fully considered and reviewed the Report of Examination together with any submissions or rebuttals and any relevant portions of the examiner's work papers, makes the following findings of fact and conclusions of law, to-wit:

JURISDICTION

I.

That the Commissioner has jurisdiction over this matter pursuant to the provisions of Miss. Code Ann. § 83-5-201 et seq. (Rev. 2011).

II.

That Magna Insurance Company is a Mississippi-domiciled Company licensed to write Life; Accident and Health; and Credit Life, Credit Health and Accident coverages.

FINDINGS OF FACT

III.

That the Commissioner, or his appointee, pursuant to Miss. Code Ann. § 83-5-201 et seq. (Rev. 2011), called for an examination of Magna Insurance Company and appointed Dave Palmer, Examiner-In-Charge, to conduct said examination.

IV.

That on or about April 23, 2015, the draft Report of Examination concerning Magna Insurance Company for the period of January 1, 2009 through December 31, 2013, was submitted to the Department by the Examiner-In-Charge, Dave Palmer.

V.

That on or about April 28, 2015, pursuant to Miss. Code Ann. § 83-5-209(2) (Rev. 2011), the Department forwarded to the Company a copy of the draft report and allowed the Company a 15-day period to submit any rebuttal to the draft report. The Department of Insurance received no written response or rebuttal to the draft of Report of Examination.

CONCLUSIONS OF LAW

VI.

The Commissioner, pursuant to Miss. Code Ann. § 83-5-209(3) (Rev. 2011), must consider and review the report along with any submissions or rebuttals and all relevant portions of examiner work papers and enter an Order: (1) adopting the Report of Examination as final or with modifications or corrections; (2) rejecting the Report of Examination with directions to reopen; or (3) calling for an investigatory hearing.

IT IS, THEREFORE, ORDERED, after reviewing the Report of Examination and all relevant examiner work papers and the Company's rebuttal, that the Report of Examination of Magna Insurance Company, attached hereto as Exhibit "A", should be and same is hereby adopted as final.

IT IS FURTHER ORDERED that a copy of the adopted Report of Examination, accompanied with this Order, shall be served upon the Company by certified mail, postage pre-paid, return receipt requested.

IT IS FURTHER ORDERED that the Mississippi Department of Insurance shall continue to hold the content of this report as private and confidential for a period of ten (10) days from the date of this Order, pursuant to Miss. Code Ann. § 83-5-209(6)(a) (Rev. 2011).

IT IS FURTHER ORDERED, pursuant to Miss. Code Ann. § 83-5-209(4) (Rev. 2011), that within thirty (30) days of the issuance of the adopted report, Magna Insurance Company shall file affidavits executed by each of its directors stating under oath that they have received a copy of the adopted report and related orders.

IT IS FURTHER ORDERED that Magna Insurance Company take the necessary actions and implement the necessary procedures to ensure that all recommendations contained in the Report of Examination are properly and promptly complied with.

SO ORDERED, this the 10th day of June, 2015.

COMMISSIONER OF INSURANCE MISSISSIPPI

MIKE CHANEY
COMMISIONER OF INSURANCE

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the above and foregoing Order and a copy of the final Report of Examination, as adopted by the Mississippi Department of Insurance, was sent by certified mail, postage pre-paid, return receipt requested, on this the 10th day of June, 2015, to:

Mr. Scott Intravia, President &CEO
Magna Insurance Company
711 East Imperial Way, Suite 100
Brea, CA 92821

Christina J. Kelsey
Senior Attorney

Christina J. Kelsey
Senior Attorney
Counsel for the Mississippi Department of Insurance
Post Office Box 79
Jackson, MS 39205-0079
(601) 359-3577
Miss. Bar No. 9853

MISSISSIPPI INSURANCE DEPARTMENT

Report of Examination

of

MAGNA INSURANCE COMPANY

as of

December 31, 2013

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EXAMINER'S AFFIDAVIT AS TO STANDARDS AND PROCEDURES USED IN AN EXAMINATION

State of Maryland,

County of Howard,

David Palmer, being duly sworn, states as follows:

1. I have authority to represent the Mississippi Insurance Department in the examination of Magna Insurance Company as of December 31, 2013.

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

3. I have reviewed the examination work papers and examination report, and the examination of Magna Insurance Company was performed in a manner consistent with the standards and procedures required by the National Association of Insurance Commissioners and the Mississippi Insurance Department.

The affiant says nothing further.

D/A Pc

David Palmer, CFE
Examiner-in-Charge

Subscribed and sworn before me by David A. Palmer on this 27 day of Feb, 20 15.

(SEAL)

BRUCE R CARTER NOTARY PUBLIC HOWARD

Bruce R Carter
Notary Public

My commission expires April 4, 2016 [date].

MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

MARK HAIRE
Deputy Commissioner of Insurance

MISSISSIPPI INSURANCE DEPARTMENT

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March 31, 2015

Honorable Mike Chaney
Commissioner of Insurance
Mississippi Insurance Department
1001 Woolfolk Building
501 North West Street
Jackson, Mississippi 39201

Dear Commissioner Chaney:

Pursuant to your instructions and authorization and in compliance with statutory provisions, an examination has been conducted, as of December 31, 2013, of the affairs and financial condition of:

MAGNA INSURANCE COMPANY
Jones Walker, Suite 800
190 Capitol Street
Jackson, MS 39201

License #	NAIC Group #	NAIC #	FEETS#	ETS
7700104	NA	61018	61018-MS-2011-21	MS120-M19

This examination was commenced in accordance with Miss. Code Ann. § 83-5-201 *et seq*.. The report of examination is herewith submitted.

SCOPE OF EXAMINATION

We have performed a full scope examination of Magna Insurance Company ("Company"). The last exam was completed as of December 31, 2008. This examination covers the period January 1, 2009 through December 31, 2013.

We conducted our examination in accordance with the NAIC *Financial Condition Examiners Handbook.* The Handbook requires that we plan and perform the examination to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company, including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. An examination also includes 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 applicable to domestic state regulations.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process.

COMMENTS AND RECOMMENDATIONS OF PREVIOUS EXAMINATION

There were no comments or recommendations of the Report of Examination as of December 31, 2008.

HISTORY OF THE COMPANY

On June 13, 1960, the Company was formed under the laws of the State of South Carolina as Argus Life Insurance Company (Argus), and commenced its business on November 27, 1962. In December 1994, Magna Bancorp, Inc. (MBI) acquired the Company and redomiciled its operations to the State of Mississippi. Thereafter, by Articles of Merger executed June 13, 1995, the former Magna Insurance Company was merged with and into Argus, with Argus being the surviving entity and the corporate name being changed to its current title. In 1997, MBI merged into Union Planters Corporation, leaving the Company as an indirect subsidiary of Union Planters and in December 2003, the Company was purchased by Hancock Holding Company (HHC). Effective March 1, 2004 and January 1, 2005, the Company assumed group credit life and credit accident & health insurance from Harrison Life Insurance Company, and, effective March 1, 2004, the Company assumed insurance business from Family Financial Life Insurance Company.

On December 1, 2011, the Company entered into an assumptive reinsurance agreement with Life of the South Insurance Company whereby all policies and their related reserves were assumed by Life of the South Insurance Company with certificates of assumption issued to policyholders. On December 29, 2011, 100% of the stock was purchased by LOTS Intermediate Company, a wholly owned subsidiary of Fortegra Financial Corporation (Fortegra).

On June 28, 2013 PRAM, LLC purchased the stock of the Company from Fortegra.

CORPORATE RECORDS

The minutes of the meetings of the stockholders and board of directors, prepared during the PRAM, LLC's ownership, were reviewed and appeared to be complete with regard to the matters brought up at the meetings for deliberation, which included approval of the Company's investment portfolio and actions of the Company's officers.

MANAGEMENT AND CONTROL

Stockholder

As of December 31, 2013, the Company had issued and outstanding 32,100 shares of common capital stock with a par value of $37.50 per share. The Company has 40,000 shares authorized. The common capital stock was owned 100% by PRAM, LLC.

All years, except for 2011, no dividends were paid to the Company's parent during the examination period. In 2011, the Company paid $12,220,471 as an extraordinary dividend to Hancock Holding Company. This dividend payment was made prior to acquisition by PRAM, LLC.

During 2013, $100,001 was contributed as "additional paid-in capital" through a non-cash forgiveness of liability transaction.

Board of Directors

The Articles of Incorporation and Bylaws vest the management and control of the Company's business affairs with the Board of Directors (Board). The members of the duly elected Board, along with their place of residence and principal occupation, at December 31, 2013, were as follows:

Name and Residence	Principal Occupation
Scott Monroe Intravia Madisonville, Louisiana	President and CEO, PRAM, LLC and Magna Insurance Company
David Paul Wilson	Executive Vice President, PRAM, LLC and

Anaheim, California	Magna Insurance Company
Mark Christopher Kuhls Kansas City, Missouri	Senior Vice President and General Counsel, PRAM, LLC and Magna Insurance Company
Lisa Michelle Collier Riverton, Utah	Vice President, PRAM, LLC and Magna Insurance Company

Committees

There were no active committees of the Board as of the examination date.

Officers

The Board of Directors elected the following individuals as its officers at December 31, 2013:

Name	Title
Scott Monroe Intravia	President and Chief Executive Officer
David Paul Wilson	Executive Vice President - Marketing
Mark Christopher Kuhls	Chief Operations Officer, General Counsel and Secretary
Susan Annette Sweeney	Chief Financial Officer

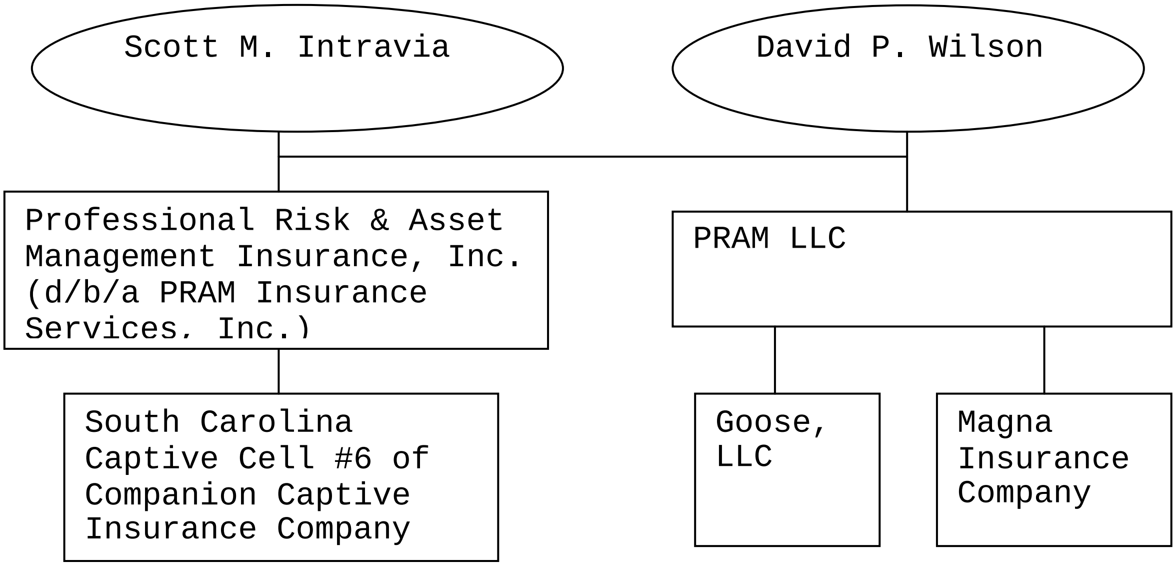
Conflict of Interest

The Company had a formal code of ethics in place, which addressed the conflict of interest policies. However, there were no written statements signed annually by all officers and members of the Board of Directors. We recommend that the Company require its senior management and key personnel to sign conflict of interest statements on an annual basis. Refer to Comment #2 in the "Comments and Recommendations" section of this Report.

HOLDING COMPANY STRUCTURE

The Company was a member of an insurance holding company system as defined in Miss. Code Ann. § 83-6-1. The Company was required to file with the MID, Holding Company Registration Statements in accordance with Miss. Code Ann. §§ 83-6-5 and 83-6-9. These filings set forth material changes in structure, identity or relationships of affiliates and any material transactions by and between the Company and its affiliates.

Organizational Chart



Parent and Affiliated Companies

Scott M. Intravia owns 52% and David P. Wilson owns 40% of the voting securities of PRAM Insurance Services, Inc.

Scott M. Intravia and David P. Wilson each own 50% of the membership interests of PRAM, LLC.

PRAM Insurance Services, Inc: This Company was established in 1989 and is an MGU/TPA which markets, underwrites and administers insurance programs, primarily fully insured prescription drug carve-out plans.

Captive Cell #6 of Companion Captive Insurance Company: This is a "segregated cell" within Companion Captive Insurance Company in which insurance risk produced by PRAM Insurance Services, Inc. is reinsured through a reinsurance treaty into the segregated cell.

Goose, LLC: This Company developed and owns the comprehensive software application that performs the insurance related administrative functions for the business underwritten by PRAM Insurance Services, Inc.

PRAM, LLC: This Company was established to be the legal entity that would acquire and own a US-based insurance Company (Magna Insurance Company).

Affiliated and Related Party Transactions

There were no written intercompany agreements in place at the examination date. However, during the exam period the Company, through its affiliation with its parent, PRAM, LLC, and MGU/TPA, PRAM, has incurred certain operating expenses which were allocated among the companies. SSAP 25, par. 7 requires that "Transactions between related parties must be in the form of a written agreement. The written agreement must provide for timely settlement of amounts owed, with a specified due date..."

Examiners recommend that the Company shall execute a formal written intercompany agreement to describe the terms of allocation among the companies and settlements requirements, in addition to other terms and conditions. If compliant with SSAP 25, par 7, the agreement in place will allow the Company to admit any future receivable from affiliates. Refer to Comment #4 of the "Comments and Recommendations" section of this Report.

FIDELITY BOND AND OTHER INSURANCE

At December 31, 2013, the Company was not covered under any financial institution bond as required by the NAIC Handbook. We recommend that the Company obtain fidelity insurance coverage in the sufficient amount as required by the minimum set in the Examiners Handbook. Refer to Comment #1 of the "Comments and Recommendations" section of this Report.

PENSIONS, STOCK OWNERSHIP AND INSURANCE PLANS

The Company did not have any employees. Pursuant to the Company's business plan, all administrative functions (i.e. premium collection, policy issue, customer service and claim paying) of the Company were performed by PRAM Insurance Services, Inc. As such, no provision was made in the financial statements for obligations under any benefit plan.

TERRITORY AND PLAN OF OPERATION

As of December 31, 2013, the Company was authorized to write life and accident and health insurance in the State of Mississippi. In addition, the Company was licensed in the states of Alabama, Arkansas, Florida, Illinois, Indiana, Kentucky, Louisiana, Missouri, South Carolina, Tennessee and Texas. The Company did not write any direct premiums in 2013.

GROWTH OF COMPANY

During the exam period, the Company's surplus decreased from $11,222,780 at December 31, 2009 to $1,220,246 at December 31, 2013. This change was attributed to the change in ownership, whereby the Company's former owner, Fortegra, sold a "shell" company to the current owner, PRAM LLC.

The Company does not currently write any direct premiums.

REINSURANCE

The Company's only source of business is obtained through a Prescription Drug Quota Share Reinsurance Agreement with North Carolina Mutual Life Insurance Company. Effective July 1, 2013, the Company assumed 50% of Prescription Drug policies with limits of up to $125,000 per active employee and $10,000 per retiree. The agreement provides for a profit commission payable based on net profit for each reinsurance agreement year. Pursuant to the agreement between North Carolina Mutual Life Insurance Company and the Company's MGU/TPA, PRAM Insurance Services, Inc., any amount due from Magna Insurance Company to North Carolina Mutual Life Insurance Company under the profit commission calculation would be paid by North Carolina Mutual Life Insurance Company to PRAM Insurance Services, Inc. Subsequent to the exam date, the Company amended its Prescription Drug Quota Share Reinsurance Agreement. Refer to "Subsequent Events" section of this Report.

The Company does not cede any business.

ACCOUNTS AND RECORDS

The Company's 2013 trial balances were tied to the original financial statements within the statutory Annual Statements filed with the MID. However, due to recorded adjustments by the independent auditor, the Company had refiled its 2013 Annual Statement with the MID, showing the capital and surplus account reduced by $35,285. The Company was audited annually by an independent CPA firm and the Company's aggregate reserve liability was calculated by a consulting actuarial firm.

The Company is licensed as a single-line insurance company pursuant to Miss. Code Ann. § 83-19-31(a), which requires the Company to maintain a minimum capital and surplus of $400,000 and $600,000, respectively.. Pursuant to Miss. Code Ann. § 83-5-55, the Company is required to file an NAIC Life, Accident and Health Annual Statement. The Company is also required to file risk-based capital (RBC) reports for each of its NAIC annual statement filings pursuant to Miss. Code Ann. § 83-5-401 through § 83-5-427.

The Company was a party to a custodian agreement with Hancock Bank. However, its custodian agreement did not comply with all provisions as required by the NAIC Examiners Handbook. We recommend that the Company amend its custodian agreement to satisfy requirements of the NAIC Examiners Handbook. Refer to Comment #3 of the "Comments and Recommendations" section of this Report.

STATUTORY DEPOSITS

The Company's statutory deposits with the State of Mississippi complied with Miss. Code Ann. § 83-19-31(2) and § 83-7-21. The following chart displays the Company's deposits at December 31, 2013.

Description of Security	**State Deposited**	**Fair Value**
Bonds and Money Market	Mississippi	$ 1,645,618
Certificate of deposit	Arkansas	100,000
Bonds	Florida	316,638
Short-term investments	Georgia	35,020
Bonds	South Carolina	179,098
Bonds	Tennessee	164,039
Bonds	Texas	54,079
Total		$ 2,494,492

FINANCIAL STATEMENTS

Introduction

The following financial statements consist of a Statement of Assets, Liabilities, Surplus and Other Funds as of December 31, 2013, a Summary of Operations for year ended December 31, 2013, a Reconciliation of Capital and Surplus for the examination period ended December 31, 2013 and a Reconciliation of Examination Adjustments to Surplus at December 31, 2013.

Statement of Assets, Liabilities, Surplus and Other Funds
December 31, 2013

Assets		
Bonds	$	1,064,814
Cash and short-term investments		1,462,048
Investment income due and accrued		9,200
Funds held by or deposited with reinsured companies		24,800
Current federal and foreign income tax recoverable		(1,842)
Total assets	$	2,559,020
Liabilities, Surplus and Other Funds		
Contract claims: accident and health	$	29,817
General expenses due or accrued		13,350
Taxes, licenses and fees due or accrued		11,587
Asset valuation reserve		3,194
Payable to parent, subsidiaries and affiliates		77,076
Total liabilities		135,024
Common capital stock, $37.50 par value; 40,000 shares authorized; 32,100 issued and outstanding		1,203,750
Gross paid-in and contributed surplus		100,001
Unassigned funds (surplus)		1,120,245
Total capital, surplus and other funds		2,423,996
Total liabilities, surplus and other funds	$	2,559,020

Summary of Operations
For the examination period ended December 31, 2013

Revenue		
Premiums earned	$	554,554
Net investment income		67,135
Amortization of interest maintenance reserve		(165,364)
Total income		456,325
Expenses		
Disability benefits and benefits under accident and health contracts	$	316,513
Commissions of premiums and annuity considerations		213,503
General insurance expenses		68,944
Insurance taxes, licenses and fees		26,793
Total expenses		625,753
Net gain from operations before dividends to policyholders and federal income tax		(169,428)
Federal and foreign income taxes incurred		1,842
Net income	$	(171,270)

Reconciliation of Capital and Surplus

For the examination period ended December 31, 2013

	2013	2012	2011	2010	2009
Capital and surplus, beginning of the year	$ 2,379,704	$ 2,330,740	$ 12,693,270	$ 12,426,530	$ 12,668,015
Net income	(171,270)	(128,235)	970,255	(54,438)	465,236
Change in net unrealized capital gains			58,843	(62,460)	(275,227)
Change in net deferred income tax	505	(505)	(460,350)	(710,539)	496,473
Change in non-admitted assets	111,009	175,329	1,106,371	900,461	363,177
Change in asset valuation reserve	4,047	2,375	151,757	(51,610)	113,338
Surplus adjustment – paid in	100,001				
Dividends to stockholders			(12,220,471)		
Change in liability for reinsurance in unauthorized companies				-	40
Aggregate write-in – prior year audit adjustment – federal income tax expense			31,067	(31,067)	
Aggregate write-in – prior year audit adjustment – federal income tax recoverable				276,396	
Capital and surplus, end of the year	$ 2,423,996	$ 2,379,704	$ 2,330,740	$ 12,693,270	$ 12,426,530

RECONCILIATION OF EXAMINATION ADJUSTMENTS TO SURPLUS
DECEMBER 31, 2013

There were no changes made to the admitted assets, liabilities or surplus balances reported by the Company for the year ended December 31, 2013. The capital and surplus, which totaled $2,423,996 as of the examination date, was determined to be reasonably stated and in compliance with Miss. Code Ann. §83-19-31.

MARKET CONDUCT ACTIVITIES

No market conduct procedures were conducted.

COMMITMENTS AND CONTINGENT LIABILITIES

Procedures performed during the course of the examination revealed no pending litigation outside of the normal course of business, commitments or other contingent liabilities to which the Company was a party.

COMMENTS AND RECOMMENDATIONS

The examination identified the following comments and recommendations:

1. Fidelity Bond:
   At December 31, 2013, the Company was not covered under any financial institution bond as required by the NAIC Handbook.

   We recommend that the Company obtain fidelity insurance coverage in the sufficient amount as required by the minimum set in the Examiners Handbook.

2. Conflicts of interest statement:
   The Company had a formal code of ethics in place, which addressed the conflict of interest policies. However, there were no written statements signed annually by all officers and members of the Board of Directors.

   We recommend that the Company require its senior management and key personnel to sign conflict of interest statements on an annual basis.

3. Custodian Agreement:
   The Company was a party to a custodian agreement with Hancock Bank. However, its custodian agreement did not comply with all provisions as required by the NAIC Examiners Handbook.

   We recommend that the Company amend its custodian agreement to satisfy requirements of the NAIC Examiners Handbook.

4. Lack of Intercompany Agreement:
   There were no written intercompany agreements in place at the examination date. However, during the exam period the Company, through its affiliation with its parent, PRAM, LLC, and MGU/TPA, PRAM, has incurred certain operating expenses which were allocated among the companies. SSAP 25, par. 7 requires that "Transactions between related parties must be in the form of a written agreement. The written agreement must provide for timely settlement of amounts owed, with a specified due date..."

   Examiners recommend that the Company shall execute a formal written intercompany agreement to describe the terms of allocation among the companies and settlements requirements, in addition to other terms and conditions. If compliant with SSAP 25, par 7, the agreement in place will allow the Company to admit any future receivable from affiliates.

SUBSEQUENT EVENTS

Subsequent to the exam date, in addition to obtaining approval of its prescription drug policy forms in the State of Mississippi, the Company obtained approval for policy forms in the following eight states – Florida, Illinois, Louisiana, Missouri, Alabama, Kentucky, Arkansas and South Carolina.

Effective March 28, 2015, the Company amended its Prescription Drug Quota Share Reinsurance Agreement with North Carolina Mutual Life Insurance Company, whereby Article XIII – Profit Commission and Exhibit C – PROFIT COMMISSION have been deleted in their entirety. Additionally, Article XIX – Duration of Reinsurance Agreement, paragraph 2 has been amended.

ACKNOWLEDGMENT

The examiners representing the Mississippi Insurance Department and participating in this examination were:

Katerina Bolbas, CFE	Supervising Examiner, Lewis & Ellis, Inc.
David Palmer, CFE	Examiner-in-charge, Lewis & Ellis, Inc.
Sarah Lucibello, CFE	Examiner, Lewis & Ellis, Inc.
Lindsey Pittman, CFE	IT Specialist, Lewis & Ellis, Inc.

The courteous cooperation of the officers and employees responsible for assisting in the examination is hereby acknowledged and appreciated.

Respectfully submitted,

David Palmer, CFE
Examiner-in-charge