

ANNUAL STATEMENT

For the Year Ended December 31, 2015

OF THE CONDITION AND AFFAIRS OF

THE STANDARD FIRE INSURANCE COMPANY

NAIC Group Code **3548** **3548** NAIC Company Code **19070** Employer's ID Number **06-6033509**
(Current Period) (Prior Period)

Organized under the Laws of Connecticut, State of Domicile or Port of Entry Connecticut,
Country of Domicile US

INCORPORATED/ORGANIZED, JULY 6, 1905 COMMENCED BUSINESS, MARCH 26, 1910

Statutory Home Office: **One Tower Square, Hartford, CT, US 06183**
Main Administrative Office: **One Tower Square, Hartford, CT, US 06183 (860) 277-0111**
Mail Address: **One Tower Square, Hartford, CT, US 06183**
Primary Location of Books and Records: **One Tower Square, Hartford, CT, US 06183 (860) 277-0111**
Internet Website Address: **www.travelers.com**
Statutory Statement Contact: **Michael J. Doody (860) 277-3966**
Annual.Statement.Contact@travelers.com (860) 277-7002
(E-Mail Address) (Fax Number)

OFFICERS

Name	Title	Name	Title
1. BRIAN WILLIAM MacLEAN	Chairman, President & Chief Executive Officer	MARIA OLIVO	Executive Vice President, Strategic Development & Treasurer
2. JAY STEVEN BENET	Vice Chairman & Chief Financial Officer	KENNETH FRANKLIN SPENCE, III	Executive Vice President & General Counsel
3. WILLIAM HERBERT HEYMAN	Vice Chairman & Chief Investment Officer	DOUGLAS KEITH BELL	Senior Vice President, Accounting Policy
4. # DOREEN SPADORCIA	Vice Chairman & Chief Executive Officer, Personal Insurance, Bond & Specialty Insurance	DOUGLAS KENNETH RUSSELL	Senior Vice President & Corporate Controller
5. ANDY FRANCIS BESSETTE	Executive Vice President & Chief Administrative Officer	SCOTT WILLIAM RYNDA	Senior Vice President, Corporate Tax
6. BRUCE RICHARD JONES	Executive Vice President & Chief Risk Officer	RENÉE HELOU DAVIS	Vice President & Chief Corporate Actuary
7. MADELYN JOSEPH LANKTON	Executive Vice President & Chief Information Officer	# WENDY CONSTANCE SKJERVEN	Vice President, Corporate Secretary & Associate Group General Counsel

DIRECTORS

JAY STEVEN BENET	BRIAN WILLIAM MacLEAN	KENNETH FRANKLIN SPENCE, III
WILLIAM HERBERT HEYMAN	DOREEN SPADORCIA	GREGORY CHESHIRE TOCZYDLOWSKI

STATE OF CONNECTICUT }
COUNTY OF HARTFORD } ss:

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC Annual Statement Instructions and Accounting Practices and Procedures manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

Brian W. MacLean

Brian W. MacLean

President

Wendy C. Skjerven

Wendy C. Skjerven

Secretary

Douglas K. Russell

Douglas K. Russell

Controller

Subscribed and sworn to before me this

21st day of January, 2016

Sandra M. Bachman
Notary Public
My Commission Expires September 30, 2017



a. Is this an original filing? Yes No
b. If no: 1. State the amendment number _____
2. Date filed _____
3. Number of pages attached _____

ASSETS

	Current Year			Prior Year
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
1. Bonds (Schedule D).....	2,166,159,571	0	2,166,159,571	2,234,939,621
2. Stocks (Schedule D):				
2.1 Preferred stocks.....	0	0	0	0
2.2 Common stocks.....	529,295,690	179,135	529,116,555	523,419,598
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens.....	0	0	0	0
3.2 Other than first liens.....	0	0	0	0
4. Real estate (Schedule A):				
4.1 Properties occupied by the company (less \$.....0 encumbrances).....	0	0	0	0
4.2 Properties held for the production of income (less \$.....0 encumbrances).....	0	0	0	0
4.3 Properties held for sale (less \$.....0 encumbrances).....	0	0	0	0
5. Cash (\$.....0, Schedule E-Part 1), cash equivalents (\$.....0, Schedule E-Part 2) and short-term investments (\$.....53,726,288, Schedule DA).....	53,726,288	0	53,726,288	85,611,456
6. Contract loans (including \$.....0 premium notes).....	0	0	0	0
7. Derivatives (Schedule DB).....	0	0	0	0
8. Other invested assets (Schedule BA).....	342,663,660	25,908,666	316,754,994	293,708,707
9. Receivables for securities.....	0	0	0	7,500
10. Securities lending reinvested collateral assets (Schedule DL).....	0	0	0	1,815,846
11. Aggregate write-ins for invested assets.....	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	3,091,845,210	26,087,801	3,065,757,409	3,139,502,728
13. Title plants less \$.....0 charged off (for Title insurers only).....	0	0	0	0
14. Investment income due and accrued.....	23,690,854	0	23,690,854	25,385,778
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	67,159,529	7,638,870	59,520,658	57,426,329
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$.....5,394,282 earned but unbilled premiums).....	208,652,441	1,187,196	207,465,245	199,299,615
15.3 Accrued retrospective premiums (\$.....0) and contracts subject to redetermination (\$.....0).....	4,256,181	383,991	3,872,190	4,059,088
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....	98,795,217	0	98,795,217	78,432,229
16.2 Funds held by or deposited with reinsured companies.....	0	0	0	0
16.3 Other amounts receivable under reinsurance contracts.....	0	0	0	0
17. Amounts receivable relating to uninsured plans.....	0	0	0	0
18.1 Current federal and foreign income tax recoverable and interest thereon.....	0	0	0	0
18.2 Net deferred tax asset.....	87,353,751	28,349,678	59,004,073	57,301,653
19. Guaranty funds receivable or on deposit.....	987,290	0	987,290	780,944
20. Electronic data processing equipment and software.....	10,816,211	0	10,816,211	16,554,577
21. Furniture and equipment, including health care delivery assets (\$.....0).....	5,489	5,489	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates.....	0	0	0	0
23. Receivables from parent, subsidiaries and affiliates.....	40,271,543	0	40,271,543	33,617,227
24. Health care (\$.....0) and other amounts receivable.....	0	0	0	0
25. Aggregate write-ins for other than invested assets.....	14,407,220	663,321	13,743,899	14,771,969
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25).....	3,648,240,935	64,316,345	3,583,924,589	3,627,132,137
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....	0	0	0	0
28. TOTALS (Lines 26 and 27).....	3,648,240,935	64,316,345	3,583,924,589	3,627,132,137

DETAILS OF WRITE-INS

1101.....	0	0	0	0
1102.....	0	0	0	0
1103.....	0	0	0	0
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	0	0	0	0
2501. Other assets.....	4,234,075	0	4,234,075	3,252,419
2502. Amounts receivable under high deductible policies.....	3,994,559	399,532	3,595,026	3,339,869
2503. Equities and deposits in pools and associations.....	2,453,133	0	2,453,133	2,921,917
2598. Summary of remaining write-ins for Line 25 from overflow page.....	3,725,453	263,789	3,461,664	5,257,765
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	14,407,220	663,321	13,743,899	14,771,969

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Year	2 Prior Year
1. Losses (Part 2A, Line 35, Column 8).....	1,401,881,722	1,412,561,206
2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6).....	56,300,680	54,140,226
3. Loss adjustment expenses (Part 2A, Line 35, Column 9).....	323,055,032	343,946,222
4. Commissions payable, contingent commissions and other similar charges.....	30,678,975	29,868,685
5. Other expenses (excluding taxes, licenses and fees).....	30,658,632	31,399,295
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	16,751,688	16,279,316
7.1 Current federal and foreign income taxes (including \$.....(67,664,212) on realized capital gains (losses)).....	1,833,160	15,657,782
7.2 Net deferred tax liability.....	0	0
8. Borrowed money \$.....0 and interest thereon \$.....0.....	0	0
9. Unearned premiums (Part 1A, Line 38, Column 5) (after deducting unearned premiums for ceded reinsurance of \$.....933,926,984 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).....	457,925,236	441,634,042
10. Advance premium.....	0	0
11. Dividends declared and unpaid:		
11.1 Stockholders.....	0	0
11.2 Policyholders.....	2,330,054	2,250,961
12. Ceded reinsurance premiums payable (net of ceding commissions).....	78,002,027	52,152,161
13. Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 19).....	0	0
14. Amounts withheld or retained by company for account of others.....	2,331,979	2,724,554
15. Remittances and items not allocated.....	136,496	136,777
16. Provision for reinsurance (including \$.....0 certified) (Schedule F, Part 8).....	0	0
17. Net adjustments in assets and liabilities due to foreign exchange rates.....	0	0
18. Drafts outstanding.....	0	0
19. Payable to parent, subsidiaries and affiliates.....	0	0
20. Derivatives.....	0	0
21. Payable for securities.....	0	11,473,801
22. Payable for securities lending.....	0	1,815,846
23. Liability for amounts held under uninsured plans.....	0	0
24. Capital notes \$.....0 and interest thereon \$.....0.....	0	0
25. Aggregate write-ins for liabilities.....	(3,504,500)	(4,080,799)
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	2,398,381,180	2,411,960,075
27. Protected cell liabilities.....	0	0
28. Total liabilities (Lines 26 and 27).....	2,398,381,180	2,411,960,075
29. Aggregate write-ins for special surplus funds.....	3,508,367	4,068,714
30. Common capital stock.....	5,000,000	5,000,000
31. Preferred capital stock.....	0	0
32. Aggregate write-ins for other than special surplus funds.....	0	0
33. Surplus notes.....	0	0
34. Gross paid in and contributed surplus.....	623,472,070	623,472,070
35. Unassigned funds (surplus).....	553,562,972	582,631,278
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....	0	0
36.20.000 shares preferred (value included in Line 31 \$.....0).....	0	0
37. Surplus as regards policyholders (Lines 29 to 35, less 36) (Page 4, Line 39).....	1,185,543,409	1,215,172,062
38. TOTALS (Page 2, Line 28, Col. 3).....	3,583,924,589	3,627,132,137

DETAILS OF WRITE-INS

2501. Retroactive reinsurance reserve assumed.....	59,134	108,206
2502. Retroactive reinsurance reserve ceded.....	(3,563,634)	(4,189,006)
2503.	0	0
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	(3,504,500)	(4,080,799)
2901. Special surplus from retroactive reinsurance.....	3,508,367	4,068,714
2902.	0	0
2903.	0	0
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	3,508,367	4,068,714
3201.	0	0
3202.	0	0
3203.	0	0
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

STATEMENT OF INCOME

	1 Current Year	2 Prior Year
UNDERWRITING INCOME		
1. Premiums earned (Part 1, Line 35, Column 4).....	990,111,724	967,054,628
DEDUCTIONS		
2. Losses incurred (Part 2, Line 35, Column 7).....	466,157,877	447,022,951
3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1).....	115,424,507	138,061,206
4. Other underwriting expenses incurred (Part 3, Line 25, Column 2).....	304,964,903	293,601,472
5. Aggregate write-ins for underwriting deductions.....	0	0
6. Total underwriting deductions (Lines 2 through 5).....	886,547,287	878,685,629
7. Net income of protected cells.....	0	0
8. Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7).....	103,564,436	88,368,999
INVESTMENT INCOME		
9. Net investment income earned (Exhibit of Net Investment Income, Line 17).....	169,614,339	178,339,282
10. Net realized capital gains (losses) less capital gains tax of \$.....(133,284) (Exhibit of Capital Gains (Losses)).....	(6,667,543)	1,900,595
11. Net investment gain (loss) (Lines 9 + 10).....	162,946,796	180,239,877
OTHER INCOME		
12. Net gain (loss) from agents' or premium balances charged off (amount recovered \$.....542,735 amount charged off \$.....2,531,000).....	(1,988,265)	(2,193,769)
13. Finance and service charges not included in premiums.....	3,618,392	3,764,859
14. Aggregate write-ins for miscellaneous income.....	(1,215,441)	16,250,439
15. Total other income (Lines 12 through 14).....	414,685	17,821,528
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	266,925,917	286,430,405
17. Dividends to policyholders.....	1,664,146	1,522,935
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17).....	265,261,771	284,907,470
19. Federal and foreign income taxes incurred.....	60,416,460	56,751,989
20. Net income (Line 18 minus Line 19) (to Line 22).....	204,845,311	228,155,481
CAPITAL AND SURPLUS ACCOUNT		
21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2).....	1,215,172,062	1,234,780,950
22. Net income (from Line 20).....	204,845,311	228,155,481
23. Net transfers (to) from Protected Cell accounts.....	0	0
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....4,309,784.....	12,304,387	20,573,436
25. Change in net unrealized foreign exchange capital gain (loss).....	0	0
26. Change in net deferred income tax.....	2,434,496	(5,151,091)
27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Column 3).....	787,152	3,585,979
28. Change in provision for reinsurance (Page 3, Line 16, Column 2 minus Column 1).....	0	0
29. Change in surplus notes.....	0	0
30. Surplus (contributed to) withdrawn from protected cells.....	0	0
31. Cumulative effect of changes in accounting principles.....	0	0
32. Capital changes:		
32.1 Paid in.....	0	0
32.2 Transferred from surplus (Stock Dividend).....	0	0
32.3 Transferred to surplus.....	0	0
33. Surplus adjustments:		
33.1 Paid in.....	0	0
33.2 Transferred to capital (Stock Dividend).....	0	0
33.3. Transferred from capital.....	0	0
34. Net remittances from or (to) Home Office.....	0	0
35. Dividends to stockholders.....	(250,000,000)	(266,800,000)
36. Change in treasury stock (Page 3, Lines 36.1 and 36.2, Column 2 minus Column 1).....	0	0
37. Aggregate write-ins for gains and losses in surplus.....	0	27,307
38. Change in surplus as regards policyholders for the year (Lines 22 through 37).....	(29,628,653)	(19,608,888)
39. Surplus as regards policyholders, December 31 current year (Line 21 plus Line 38) (Page 3, Line 37).....	1,185,543,409	1,215,172,062
DETAILS OF WRITE-INS		
0501.	0	0
0502.	0	0
0503.	0	0
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598) (Line 5 above).....	0	0
1401. Other assets tri-party/tax credit bond income.....	157,339	239,098
1402. Fines and penalties of regulatory authorities.....	(53,490)	(50,540)
1403. Retroactive reinsurance gain/loss.....	(187,208)	(265,652)
1498. Summary of remaining write-ins for Line 14 from overflow page.....	(1,132,083)	16,327,533
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	(1,215,441)	16,250,439
3701. Prior period adjustment.....	0	27,307
3702.	0	0
3703.	0	0
3798. Summary of remaining write-ins for Line 37 from overflow page.....	0	0
3799. Totals (Lines 3701 thru 3703 plus 3798) (Line 37 above).....	0	27,307

CASH FLOW

	1 Current Year	2 Prior Year
CASH FROM OPERATIONS		
1. Premiums collected net of reinsurance.....	1,021,932,568	995,187,298
2. Net investment income.....	181,799,099	191,944,417
3. Miscellaneous income.....	414,685	17,821,528
4. Total (Lines 1 through 3).....	1,204,146,353	1,204,953,244
5. Benefit and loss related payments.....	495,039,896	491,702,247
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....	0	0
7. Commissions, expenses paid and aggregate write-ins for deductions.....	440,843,418	404,000,252
8. Dividends paid to policyholders.....	1,585,054	1,545,813
9. Federal and foreign income taxes paid (recovered) net of \$.....5,547,316 tax on capital gains (losses).....	74,107,798	44,355,916
10. Total (Lines 5 through 9).....	1,011,576,166	941,604,228
11. Net cash from operations (Line 4 minus Line 10).....	192,570,187	263,349,016
CASH FROM INVESTMENTS		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds.....	438,692,026	378,768,050
12.2 Stocks.....	23,357	610,500
12.3 Mortgage loans.....	0	0
12.4 Real estate.....	0	0
12.5 Other invested assets.....	23,073,562	11,130,938
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....	0	0
12.7 Miscellaneous proceeds.....	1,823,346	1,209,182
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	463,612,291	391,718,670
13. Cost of investments acquired (long-term only):		
13.1 Bonds.....	378,403,810	317,392,715
13.2 Stocks.....	0	0
13.3 Mortgage loans.....	0	0
13.4 Real estate.....	0	0
13.5 Other invested assets.....	46,773,409	52,466,837
13.6 Miscellaneous applications.....	11,473,801	533,699
13.7 Total investments acquired (Lines 13.1 to 13.6).....	436,651,020	370,393,251
14. Net increase (decrease) in contract loans and premium notes.....	0	0
15. Net cash from investments (Line 12.8 minus Lines 13.7 minus Line 14).....	26,961,271	21,325,418
CASH FROM FINANCING AND MISCELLANEOUS SOURCES		
16. Cash provided (applied):		
16.1 Surplus notes, capital notes.....	0	0
16.2 Capital and paid in surplus, less treasury stock.....	0	0
16.3 Borrowed funds.....	0	0
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....	0	0
16.5 Dividends to stockholders.....	250,000,000	266,800,000
16.6 Other cash provided (applied).....	(1,416,626)	(7,394,100)
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6).....	(251,416,626)	(274,194,100)
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS		
18. Net change in cash, cash equivalents and short-term investments (Line 11 plus Line 15 plus Line 17).....	(31,885,168)	10,480,334
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year.....	85,611,456	75,131,122
19.2 End of year (Line 18 plus Line 19.1).....	53,726,288	85,611,456
Note: Supplemental disclosures of cash flow information for non-cash transactions:		
20.0001 Tax credits received from certified capital company (CAPCO).....	16,209	0
20.0002 Interest payment received in securities.....	7,500	0
20.0003 Exchange of bonds.....	1,482,000	6,486,360

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1 - PREMIUMS EARNED

Line of Business		1 Net Premiums Written per Column 6, Part 1B	2 Unearned Premiums December 31 Prior Year- per Col. 3, Last Year's Part 1	3 Unearned Premiums December 31 Current Year- per Col. 5, Part 1A	4 Premiums Earned During Year (Cols. 1 + 2 - 3)
1.	Fire.....	25,554,480	12,182,413	11,932,951	25,803,941
2.	Allied lines.....	23,092,498	11,635,764	11,649,926	23,078,336
3.	Farmowners multiple peril.....	8,168,368	3,772,446	3,947,229	7,993,585
4.	Homeowners multiple peril.....	155,211,671	83,137,625	83,510,416	154,838,881
5.	Commercial multiple peril.....	146,737,529	66,594,270	67,050,585	146,281,214
6.	Mortgage guaranty.....	0	0	0	0
8.	Ocean marine.....	10,726,187	4,824,542	4,458,621	11,092,108
9.	Inland marine.....	32,048,337	15,151,197	14,994,398	32,205,136
10.	Financial guaranty.....	0	0	0	0
11.1	Medical professional liability - occurrence.....	(8)	(61)	(11)	(58)
11.2	Medical professional liability - claims-made.....	(7,149)	0	0	(7,149)
12.	Earthquake.....	5,574,724	2,925,350	2,965,746	5,534,328
13.	Group accident and health.....	0	0	0	0
14.	Credit accident and health (group and individual).....	0	0	0	0
15.	Other accident and health.....	0	0	0	0
16.	Workers' compensation.....	191,506,679	71,261,306	73,592,132	189,175,853
17.1	Other liability - occurrence.....	86,457,217	36,468,288	37,705,737	85,219,768
17.2	Other liability - claims-made.....	27,320,659	15,663,386	15,307,919	27,676,126
17.3	Excess workers' compensation.....	921,224	329,425	321,864	928,786
18.1	Products liability - occurrence.....	6,678,108	2,925,992	2,769,579	6,834,521
18.2	Products liability - claims-made.....	1,262,262	582,740	619,577	1,225,425
19.1, 19.2	Private passenger auto liability.....	106,480,579	37,099,848	43,267,065	100,313,363
19.3, 19.4	Commercial auto liability.....	73,870,823	31,662,195	33,123,999	72,409,019
21.	Auto physical damage.....	88,626,231	32,219,316	36,713,232	84,132,315
22.	Aircraft (all perils).....	5,702	0	0	5,702
23.	Fidelity.....	2,382,423	1,592,525	1,547,121	2,427,828
24.	Surety.....	664,060	64,185	236,598	491,648
26.	Burglary and theft.....	316,434	172,324	179,982	308,775
27.	Boiler and machinery.....	9,189,017	4,033,882	4,092,076	9,130,823
28.	Credit.....	112	312	259	165
29.	International.....	110,380	693	418	110,654
30.	Warranty.....	0	0	0	0
31.	Reinsurance - nonproportional assumed property.....	1,803,835	787,719	727,027	1,864,527
32.	Reinsurance - nonproportional assumed liability.....	798,316	462,978	441,442	819,852
33.	Reinsurance - nonproportional assumed financial lines.....	91,599	47,931	54,427	85,102
34.	Aggregate write-ins for other lines of business.....	133,403	88,231	90,484	131,150
35.	TOTALS.....	1,005,725,700	435,686,822	451,300,798	990,111,724

DETAILS OF WRITE-INS

3401.	Tribal workers' compensation.....	133,403	88,231	90,484	131,150
3402.	0	0	0	0
3403.	0	0	0	0
3498.	Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0
3499.	Totals (Lines 3401 thru 3403 plus 3498) (Line 34 above).....	133,403	88,231	90,484	131,150

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1A - RECAPITULATION OF ALL PREMIUMS

Line of Business		1	2	3	4	5
		Amount Unearned (Running One Year or Less from Date of Policy) (a)	Amount Unearned (Running More Than One Year from Date of Policy) (a)	Earned But Unbilled Premium	Reserve for Rate Credits and Retrospective Adjustments Based on Experience	Total Reserve for Unearned Premiums Cols. 1 + 2 + 3 + 4
1.	Fire.....	11,823,636	198,855	(89,539)	.0	11,932,951
2.	Allied lines.....	11,369,590	280,433	(97)	.0	11,649,926
3.	Farmowners multiple peril.....	3,986,623	(39,393)	0	.0	3,947,229
4.	Homeowners multiple peril.....	83,511,222	(807)	0	.0	83,510,416
5.	Commercial multiple peril.....	67,996,868	(31,321)	(914,961)	.0	67,050,585
6.	Mortgage guaranty.....	0	0	0	.0	0
8.	Ocean marine.....	4,610,979	124,325	(276,683)	.0	4,458,621
9.	Inland marine.....	12,560,278	2,511,304	(77,184)	.0	14,994,398
10.	Financial guaranty.....	0	0	0	.0	0
11.1	Medical professional liability - occurrence.....	(11)	0	0	.0	(11)
11.2	Medical professional liability - claims-made.....	0	0	0	.0	0
12.	Earthquake.....	2,869,394	96,353	0	.0	2,965,746
13.	Group accident and health.....	0	0	0	.0	0
14.	Credit accident and health (group and individual).....	0	0	0	.0	0
15.	Other accident and health.....	0	0	0	.0	0
16.	Workers' compensation.....	78,209,320	12,135	(3,240,099)	(1,389,223)	73,592,132
17.1	Other liability - occurrence.....	38,703,649	(664,175)	(741,971)	408,233	37,705,737
17.2	Other liability - claims-made.....	12,699,486	2,594,837	13,595	.0	15,307,919
17.3	Excess workers' compensation.....	322,203	0	(339)	.0	321,864
18.1	Products liability - occurrence.....	2,815,970	5,925	(94,090)	41,773	2,769,579
18.2	Products liability - claims-made.....	619,142	(26,651)	27,086	.0	619,577
19.1, 19.2	Private passenger auto liability.....	43,267,065	0	0	.0	43,267,065
19.3, 19.4	Commercial auto liability.....	33,350,706	64,233	0	(290,939)	33,123,999
21.	Auto physical damage.....	36,708,271	4,960	0	.0	36,713,232
22.	Aircraft (all perils).....	0	0	0	.0	0
23.	Fidelity.....	948,338	598,783	0	.0	1,547,121
24.	Surety.....	21,475	215,123	0	.0	236,598
26.	Burglary and theft.....	126,758	53,224	0	.0	179,982
27.	Boiler and machinery.....	3,518,509	573,567	0	.0	4,092,076
28.	Credit.....	259	0	0	.0	259
29.	International.....	418	0	0	.0	418
30.	Warranty.....	0	0	0	.0	0
31.	Reinsurance - nonproportional assumed property.....	490,698	236,329	0	.0	727,027
32.	Reinsurance - nonproportional assumed liability.....	435,673	5,769	0	.0	441,442
33.	Reinsurance - nonproportional assumed financial lines.....	54,427	0	0	.0	54,427
34.	Aggregate write-ins for other lines of business.....	90,484	0	0	.0	90,484
35.	TOTALS.....	451,111,430	6,813,807	(5,394,282)	(1,230,156)	451,300,798
36.	Accrued retrospective premiums based on experience.....					1,230,156
37.	Earned but unbilled premiums.....					5,394,282
38.	Balance (sum of Lines 35 through 37).....					457,925,236

DETAILS OF WRITE-INS

3401.	Tribal workers' compensation.....	90,484	0	0	.0	90,484
3402.	0	0	0	.0	0
3403.	0	0	0	.0	0
3498.	Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	.0	0
3499.	Totals (Lines 3401 thru 3403 plus 3498) (Line 34 above).....	90,484	0	0	.0	90,484

(a) State here basis of computation used in each case: Daily pro rata; pools and associations as submitted.

THE STANDARD FIRE INSURANCE COMPANY UNDERWRITING AND INVESTMENT EXHIBIT

PART 1B - PREMIUMS WRITTEN

Line of Business	1	Reinsurance Assumed		Reinsurance Ceded		6
	Direct Business (a)	2 From Affiliates	3 From Non-Affiliates	4 To Affiliates	5 To Non-Affiliates	Net Premiums Written (Cols. 1 + 2 + 3 - 4 - 5)
1. Fire.....	21,286,051	25,554,480	2,320,531	23,606,582	0	25,554,480
2. Allied lines.....	21,049,580	23,092,498	7,100,392	28,149,972	0	23,092,498
3. Farmowners multiple peril.....	0	8,168,368	0	0	0	8,168,368
4. Homeowners multiple peril.....	429,768,223	155,211,671	1,902,861	431,671,084	0	155,211,671
5. Commercial multiple peril.....	53,396	146,737,529	0	53,396	0	146,737,529
6. Mortgage guaranty.....	0	0	0	0	0	0
8. Ocean marine.....	35,793,483	10,726,187	0	35,793,483	0	10,726,187
9. Inland marine.....	10,435,848	32,048,337	0	10,435,848	0	32,048,337
10. Financial guaranty.....	0	0	0	0	0	0
11.1 Medical professional liability - occurrence.....	0	(8)	0	0	0	(8)
11.2 Medical professional liability - claims-made.....	0	(7,149)	0	0	0	(7,149)
12. Earthquake.....	3,760,882	5,574,724	0	3,760,882	0	5,574,724
13. Group accident and health.....	0	0	0	0	0	0
14. Credit accident and health (group and individual).....	0	0	0	0	0	0
15. Other accident and health.....	0	0	0	0	0	0
16. Workers' compensation.....	157,657,293	191,506,679	0	157,657,293	0	191,506,679
17.1 Other liability - occurrence.....	13,977,881	86,457,217	34,558	14,012,439	0	86,457,217
17.2 Other liability - claims-made.....	0	27,320,659	0	0	0	27,320,659
17.3 Excess workers' compensation.....	0	921,224	0	0	0	921,224
18.1 Products liability - occurrence.....	0	6,678,108	0	0	0	6,678,108
18.2 Products liability - claims-made.....	0	1,262,262	0	0	0	1,262,262
19.1, 19.2 Private passenger auto liability.....	584,975,078	106,480,579	187,199,271	772,174,349	0	106,480,579
19.3, 19.4 Commercial auto liability.....	0	73,870,823	0	0	0	73,870,823
21. Auto physical damage.....	350,354,434	88,626,231	143,101,057	493,455,491	0	88,626,231
22. Aircraft (all perils).....	0	5,702	0	0	0	5,702
23. Fidelity.....	0	2,382,423	0	0	0	2,382,423
24. Surety.....	740	664,060	0	740	0	664,060
26. Burglary and theft.....	20,390	316,434	20,396	40,785	0	316,434
27. Boiler and machinery.....	0	9,189,017	0	0	0	9,189,017
28. Credit.....	0	112	0	0	0	112
29. International.....	0	110,380	0	0	0	110,380
30. Warranty.....	0	0	0	0	0	0
31. Reinsurance - nonproportional assumed property.....	XXX	1,803,835	0	0	0	1,803,835
32. Reinsurance - nonproportional assumed liability.....	XXX	798,316	0	0	0	798,316
33. Reinsurance - nonproportional assumed financial lines.....	XXX	91,599	0	0	0	91,599
34. Aggregate write-ins for other lines of business.....	0	133,403	0	0	0	133,403
35. TOTALS.....	1,629,133,277	1,005,725,700	341,679,066	1,970,812,343	0	1,005,725,700

DETAILS OF WRITE-INS

3401. Tribal workers' compensation.....	0	133,403	0	0	0	133,403
3402.	0	0	0	0	0	0
3403.	0	0	0	0	0	0
3498. Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0	0	0
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34 above).....	0	133,403	0	0	0	133,403

(a) Does the company's direct premiums written include premiums recorded on an installment basis? Yes [] No [X]

If yes: 1. The amount of such installment premiums \$.....0.

2. Amount at which such installment premiums would have been reported had they been recorded on an annualized basis \$.....0.

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2 - LOSSES PAID AND INCURRED

Line of Business	Losses Paid Less Salvage				5 Net Losses Unpaid Current Year (Part 2A, Col. 8)	6 Net Losses Unpaid Prior Year	7 Losses Incurred Current Year (Cols. 4 + 5 - 6)	8 Percentage of Losses Incurred (Col. 7, Part 2) to Premiums Earned (Col. 4, Part 1)
	1 Direct Business	2 Reinsurance Assumed	3 Reinsurance Recovered	4 Net Payments (Cols. 1 + 2 - 3)				
1. Fire.....	6,868,907	12,647,135	8,277,421	11,238,621	11,470,078	9,481,549	13,227,151	51.3
2. Allied lines.....	43,328,758	15,273,141	48,769,313	9,832,587	6,497,234	9,671,655	6,658,166	28.9
3. Farmowners multiple peril.....	0	3,000,562	0	3,000,562	2,379,794	2,664,617	2,715,739	34.0
4. Homeowners multiple peril.....	175,262,779	64,813,239	175,713,449	64,362,569	30,532,779	33,292,624	61,602,724	39.8
5. Commercial multiple peril.....	371,970	61,240,255	371,970	61,240,255	119,939,325	123,921,211	57,258,370	39.1
6. Mortgage guaranty.....	0	0	0	0	0	0	0	0.0
8. Ocean marine.....	19,907,442	4,487,855	19,907,442	4,487,855	8,675,015	9,206,401	3,956,468	35.7
9. Inland marine.....	3,243,023	13,872,018	3,243,023	13,872,018	8,919,721	12,120,356	10,671,382	33.1
10. Financial guaranty.....	0	0	0	0	0	0	0	0.0
11.1 Medical professional liability - occurrence.....	0	211,365	0	211,365	679,664	989,268	(98,239)	168,390.7
11.2 Medical professional liability - claims-made.....	0	7,262	0	7,262	2,351,786	2,553,748	(194,701)	2,723.5
12. Earthquake.....	72	6,928	72	6,928	29,437	257,748	(221,383)	(4.0)
13. Group accident and health.....	0	0	0	0	0	0	0	0.0
14. Credit accident and health (group and individual).....	0	0	0	0	0	0	0	0.0
15. Other accident and health.....	0	0	0	0	0	0	0	0.0
16. Workers' compensation.....	76,537,982	86,595,565	76,537,982	86,595,565	647,973,044	627,469,396	107,099,213	56.6
17.1 Other liability - occurrence.....	11,065,788	36,750,932	11,078,706	36,738,015	203,734,971	212,133,146	28,339,840	33.3
17.2 Other liability - claims-made.....	0	20,645,302	0	20,645,302	72,146,557	75,678,923	17,112,937	61.8
17.3 Excess workers' compensation.....	0	932,335	0	932,335	25,601,772	24,754,150	1,779,958	191.6
18.1 Products liability - occurrence.....	237,043	6,882,620	237,043	6,882,620	36,406,665	40,678,204	2,611,081	38.2
18.2 Products liability - claims-made.....	0	258,636	0	258,636	1,467,096	1,549,501	176,232	14.4
19.1, 19.2 Private passenger auto liability.....	205,313,777	148,858,917	296,290,148	57,882,547	83,755,781	84,622,197	57,016,130	56.8
19.3, 19.4 Commercial auto liability.....	0	41,500,868	0	41,500,868	95,209,107	95,737,391	40,972,584	56.6
21. Auto physical damage.....	192,240,986	134,968,149	278,596,117	48,613,018	6,675,082	4,476,151	50,811,949	60.4
22. Aircraft (all perils).....	0	6,833	0	6,833	373,115	417,556	(37,608)	(659.6)
23. Fidelity.....	0	1,471,365	0	1,471,365	4,293,562	6,168,735	(403,808)	(16.6)
24. Surety.....	0	200,923	0	200,923	2,625,067	3,603,773	(777,783)	(158.2)
26. Burglary and theft.....	319	89,560	4,774	85,105	342,623	317,415	110,312	35.7
27. Boiler and machinery.....	0	2,994,999	0	2,994,999	2,279,509	1,929,120	3,345,388	36.6
28. Credit.....	0	(922)	0	(922)	334,908	333,082	905	548.4
29. International.....	0	201,302	0	201,302	399,031	426,409	173,924	157.2
30. Warranty.....	0	0	0	0	0	0	0	0.0
31. Reinsurance - nonproportional assumed property.....	XXX	684,644	0	684,644	2,418,168	1,678,297	1,424,515	76.4
32. Reinsurance - nonproportional assumed liability.....	XXX	2,793,425	0	2,793,425	23,482,941	25,560,576	715,790	87.3
33. Reinsurance - nonproportional assumed financial lines.....	XXX	42,177	0	42,177	702,541	701,525	43,193	50.8
34. Aggregate write-ins for other lines of business.....	0	48,580	0	48,580	185,349	166,481	67,449	51.4
35. TOTALS.....	734,378,848	661,485,973	919,027,461	476,837,361	1,401,881,722	1,412,561,206	466,157,877	47.1

DETAILS OF WRITE-INS

3401. Tribal workers' compensation.....	0	48,580	0	48,580	185,349	166,481	67,449	51.4
3402.	0	0	0	0	0	0	0	0.0
3403.	0	0	0	0	0	0	0	0.0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0	0	XXX
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34 above).....	0	48,580	0	48,580	185,349	166,481	67,449	51.4

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2A - UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

Line of Business	Reported Losses				Incurred But Not Reported			8 Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	9 Net Unpaid Loss Adjustment Expenses
	1 Direct	2 Reinsurance Assumed	3 Deduct Reinsurance Recoverable	4 Net Losses Excluding Incurred but not Reported (Cols. 1 + 2 - 3)	5 Direct	6 Reinsurance Assumed	7 Reinsurance Ceded		
1. Fire.....	2,070,884	7,490,588	2,350,177	7,211,295	1,305,753	4,337,201	1,384,171	11,470,078	761,294
2. Allied lines.....	14,104,700	5,398,406	14,522,796	4,980,310	2,616,972	1,778,222	2,878,271	6,497,234	1,976,440
3. Farmowners multiple peril.....	0	1,073,831	0	1,073,831	0	1,305,963	0	2,379,794	659,755
4. Homeowners multiple peril.....	47,222,669	17,769,676	47,444,700	17,547,645	36,324,413	13,031,937	36,371,216	30,532,779	5,518,131
5. Commercial multiple peril.....	1,072,599	63,054,168	1,072,599	63,054,168	583,624	56,885,157	583,624	119,939,325	47,804,445
6. Mortgage guaranty.....	0	0	0	0	0	0	0	0	0
8. Ocean marine.....	3,939,616	4,508,355	3,939,616	4,508,355	2,285,996	4,166,660	2,285,996	8,675,015	1,942,850
9. Inland marine.....	318,045	6,206,035	318,045	6,206,035	610,842	2,713,686	610,842	8,919,721	1,096,164
10. Financial guaranty.....	0	0	0	0	0	0	0	0	0
11.1 Medical professional liability - occurrence.....	0	422,357	0	422,357	0	257,307	0	679,664	206,033
11.2 Medical professional liability - claims-made.....	0	1,172,605	0	1,172,605	0	1,179,181	0	2,351,786	389,436
12. Earthquake.....	0	30,104	0	30,104	(2,029)	(667)	(2,029)	29,437	19,398
13. Group accident and health.....	0	0	0	0	0	0	0	(a) 0	0
14. Credit accident and health (group and individual).....	0	0	0	0	0	0	0	0	0
15. Other accident and health.....	0	0	0	0	0	0	0	(a) 0	0
16. Workers' compensation.....	296,219,760	333,102,707	296,219,760	333,102,707	190,063,344	314,870,337	190,063,344	647,973,044	97,024,872
17.1 Other liability - occurrence.....	13,171,656	47,321,507	13,180,131	47,313,031	14,471,160	156,446,910	14,496,130	203,734,971	71,719,505
17.2 Other liability - claims-made.....	0	25,178,494	0	25,178,494	10	46,968,063	10	72,146,557	25,087,275
17.3 Excess workers' compensation.....	0	13,015,055	0	13,015,055	14,322	12,586,717	14,322	25,601,772	1,555,993
18.1 Products liability - occurrence.....	1,025,584	7,997,473	1,025,584	7,997,473	2,934,302	28,409,192	2,934,302	36,406,665	34,933,716
18.2 Products liability - claims-made.....	0	338,250	0	338,250	0	1,128,847	0	1,467,096	1,124,723
19.1, 19.2 Private passenger auto liability.....	171,463,810	91,904,516	215,036,230	48,332,095	139,575,994	35,423,685	139,575,994	83,755,781	11,979,461
19.3, 19.4 Commercial auto liability.....	0	47,510,871	0	47,510,871	151	47,698,236	151	95,209,107	9,883,952
21. Auto physical damage.....	9,969,921	7,563,447	14,504,687	3,028,681	2,143,549	3,646,401	2,143,549	6,675,082	4,737,298
22. Aircraft (all perils).....	0	253,168	0	253,168	46,372	119,947	46,372	373,115	238,117
23. Fidelity.....	0	469,975	0	469,975	55	3,823,587	55	4,293,562	1,706,842
24. Surety.....	0	1,453,535	0	1,453,535	(210)	1,171,532	(210)	2,625,067	485,445
26. Burglary and theft.....	323	687	581	429	60	342,382	248	342,623	118,840
27. Boiler and machinery.....	0	1,340,908	0	1,340,908	0	938,600	0	2,279,509	429,387
28. Credit.....	0	85,798	0	85,798	0	249,110	0	334,908	(25,765)
29. International.....	0	163,836	0	163,836	0	235,195	0	399,031	38,492
30. Warranty.....	0	0	0	0	0	0	0	0	0
31. Reinsurance - nonproportional assumed property.....	XXX	1,694,217	0	1,694,217	XXX	723,951	0	2,418,168	222,071
32. Reinsurance - nonproportional assumed liability.....	XXX	14,125,627	0	14,125,627	XXX	9,357,313	0	23,482,941	1,277,359
33. Reinsurance - nonproportional assumed financial lines.....	XXX	200,749	0	200,749	XXX	501,793	0	702,541	64,074
34. Aggregate write-ins for other lines of business.....	0	24,233	0	24,233	0	161,116	0	185,349	79,429
35. TOTALS.....	560,579,568	700,871,178	609,614,907	651,835,839	392,974,680	750,457,562	393,386,358	1,401,881,722	323,055,032
DETAILS OF WRITE-INS									
3401. Tribal workers' compensation.....	0	24,233	0	24,233	0	161,116	0	185,349	79,429
3402.	0	0	0	0	0	0	0	0	0
3403.	0	0	0	0	0	0	0	0	0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0	0	0	0
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34 above).....	0	24,233	0	24,233	0	161,116	0	185,349	79,429

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(a) Including \$.....0 for present value of life indemnity claims.

UNDERWRITING AND INVESTMENT EXHIBIT

PART 3 - EXPENSES

	1	2	3	4
	Loss Adjustment Expenses	Other Underwriting Expenses	Investment Expenses	Total
1. Claim adjustment services:				
1.1 Direct.....	43,317,330	0	0	43,317,330
1.2 Reinsurance assumed.....	65,048,767	0	0	65,048,767
1.3 Reinsurance ceded.....	48,101,864	0	0	48,101,864
1.4 Net claim adjustment services (1.1 + 1.2 - 1.3).....	60,264,233	0	0	60,264,233
2. Commission and brokerage:				
2.1 Direct, excluding contingent.....	0	206,286,011	0	206,286,011
2.2 Reinsurance assumed, excluding contingent.....	0	183,096,899	0	183,096,899
2.3 Reinsurance ceded, excluding contingent.....	0	256,857,331	0	256,857,331
2.4 Contingent - direct.....	0	25,152,315	0	25,152,315
2.5 Contingent - reinsurance assumed.....	0	9,588,952	0	9,588,952
2.6 Contingent - reinsurance ceded.....	0	25,152,315	0	25,152,315
2.7 Policy and membership fees.....	0	0	0	0
2.8 Net commission and brokerage (2.1 + 2.2 - 2.3 + 2.4 + 2.5 - 2.6 + 2.7).....	0	142,114,531	0	142,114,531
3. Allowances to manager and agents.....	0	164,822	0	164,822
4. Advertising.....	7,733	5,526,579	201	5,534,513
5. Boards, bureaus and associations.....	238,656	4,066,528	848	4,306,032
6. Surveys and underwriting reports.....	17	3,893,112	0	3,893,129
7. Audit of assureds' records.....	0	0	0	0
8. Salary and related items:				
8.1 Salaries.....	33,281,532	69,805,378	1,062,382	104,149,292
8.2 Payroll taxes.....	2,422,496	4,612,544	41,370	7,076,410
9. Employee relations and welfare.....	5,764,001	10,945,203	99,698	16,808,902
10. Insurance.....	4,472,432	847,994	459	5,320,885
11. Directors' fees.....	0	0	0	0
12. Travel and travel items.....	1,761,876	3,429,249	15,908	5,207,033
13. Rent and rent items.....	1,782,998	4,243,068	20,944	6,047,010
14. Equipment.....	339,559	1,856,646	8,177	2,204,382
15. Cost or depreciation of EDP equipment and software.....	1,046,127	13,853,707	13,673	14,913,507
16. Printing and stationery.....	127,369	396,431	2,827	526,627
17. Postage, telephone and telegraph, exchange and express.....	560,539	4,203,475	3,311	4,767,325
18. Legal and auditing.....	1,528,278	1,552,858	58,292	3,139,428
19. Totals (Lines 3 to 18).....	53,333,613	129,397,594	1,328,090	184,059,297
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of \$.....102,423.....	0	25,525,378	0	25,525,378
20.2 Insurance department licenses and fees.....	0	1,879,868	0	1,879,868
20.3 Gross guaranty association assessments.....	0	10,584	0	10,584
20.4 All other (excluding federal and foreign income and real estate).....	0	787,668	0	787,668
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4).....	0	28,203,498	0	28,203,498
21. Real estate expenses.....	0	0	18	18
22. Real estate taxes.....	0	0	0	0
23. Reimbursements by uninsured plans.....	0	0	0	0
24. Aggregate write-ins for miscellaneous expenses.....	1,826,660	5,249,279	152,281	7,228,220
25. Total expenses incurred.....	115,424,506	304,964,902	1,480,389	(a).....421,869,797
26. Less unpaid expenses - current year.....	323,055,032	77,559,986	529,309	401,144,327
27. Add unpaid expenses - prior year.....	343,946,222	76,932,667	614,629	421,493,518
28. Amounts receivable relating to uninsured plans, prior year.....	0	0	0	0
29. Amounts receivable relating to uninsured plans, current year.....	0	0	0	0
30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29).....	136,315,696	304,337,583	1,565,708	442,218,988

DETAILS OF WRITE-INS

2401. Miscellaneous expenses.....	2,767,852	15,892,737	159,947	18,820,536
2402. Service reimbursements.....	(432,428)	(5,118,905)	0	(5,551,333)
2403. Cost of computer software developed for internal use.....	(508,764)	(5,524,553)	(7,666)	(6,040,983)
2498. Summary of remaining write-ins for Line 24 from overflow page.....	0	0	0	0
2499. Totals (Lines 2401 thru 2403 plus 2498) (Line 24 above).....	1,826,660	5,249,279	152,281	7,228,220

(a) Includes management fees of \$.....0 to affiliates and \$.....0 to non-affiliates.

EXHIBIT OF NET INVESTMENT INCOME

	1 Collected During Year	2 Earned During Year
1. U.S. government bonds.....	(a).....1,851,8591,425,452
1.1 Bonds exempt from U.S. tax.....	(a).....45,514,07044,357,484
1.2 Other bonds (unaffiliated).....	(a).....32,924,48632,778,871
1.3 Bonds of affiliates.....	(a).....00
2.1 Preferred stocks (unaffiliated).....	(b).....00
2.11 Preferred stocks of affiliates.....	(b).....00
2.2 Common stocks (unaffiliated).....00
2.21 Common stocks of affiliates.....66,600,00066,600,000
3. Mortgage loans.....	(c).....00
4. Real estate.....	(d).....00
5. Contract loans.....00
6. Cash, cash equivalents and short-term investments.....	(e).....205,868203,720
7. Derivative instruments.....	(f).....00
8. Other invested assets.....24,235,88024,271,711
9. Aggregate write-ins for investment income.....1,471,8141,471,814
10. Total gross investment income.....172,803,976171,109,052
11. Investment expenses.....		(g).....1,480,389
12. Investment taxes, licenses and fees, excluding federal income taxes.....		(g).....0
13. Interest expense.....		(h).....0
14. Depreciation on real estate and other invested assets.....		(i).....0
15. Aggregate write-ins for deductions from investment income.....	14,325
16. Total deductions (Lines 11 through 15).....	1,494,714
17. Net investment income (Line 10 minus Line 16).....	169,614,339

DETAILS OF WRITE-INS

0901. Property and wind plans.....1,470,7131,470,713
0902. Securities lending income.....1,1011,101
0903.00
0998. Summary of remaining write-ins for Line 9 from overflow page.....00
0999. Totals (Lines 0901 thru 0903 plus 0998) (Line 9 above).....1,471,8141,471,814
1501. Miscellaneous expense.....	14,325
1502.0
1503.0
1598. Summary of remaining write-ins for Line 15 from overflow page.....	0
1599. Totals (Lines 1501 thru 1503 plus 1598) (Line 15 above).....	14,325

- (a) Includes \$.....1,271,443 accrual of discount less \$.....11,363,119 amortization of premium and less \$.....647,510 paid for accrued interest on purchases.
- (b) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued dividends on purchases.
- (c) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (d) Includes \$.....0 for company's occupancy of its own buildings; and excludes \$.....0 interest on encumbrances.
- (e) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (f) Includes \$.....0 accrual of discount less \$.....0 amortization of premium.
- (g) Includes \$.....0 investment expenses and \$.....0 investment taxes, licenses and fees, excluding federal income taxes, attributable to Segregated and Separate Accounts.
- (h) Includes \$.....0 interest on surplus notes and \$.....0 interest on capital notes.
- (i) Includes \$.....0 depreciation on real estate and \$.....0 depreciation on other invested assets.

EXHIBIT OF CAPITAL GAINS (LOSSES)

	1 Realized Gain (Loss) on Sales or Maturity	2 Other Realized Adjustments	3 Total Realized Capital Gain (Loss) (Columns 1 + 2)	4 Change in Unrealized Capital Gain (Loss)	5 Change in Unrealized Foreign Exchange Capital Gain (Loss)
1. U.S. government bonds.....1,464,24201,464,24200
1.1 Bonds exempt from U.S. tax.....1,164,94301,164,94300
1.2 Other bonds (unaffiliated).....2,112,742(3,712,382)(1,599,640)579,0060
1.3 Bonds of affiliates.....00000
2.1 Preferred stocks (unaffiliated).....00000
2.11 Preferred stocks of affiliates.....00000
2.2 Common stocks (unaffiliated).....23,357023,357(3,970)0
2.21 Common stocks of affiliates.....0005,826,2420
3. Mortgage loans.....00000
4. Real estate.....00000
5. Contract loans.....00000
6. Cash, cash equivalents and short-term investments.....00000
7. Derivative instruments.....00000
8. Other invested assets.....(1,044)(7,852,685)(7,853,729)10,212,8930
9. Aggregate write-ins for capital gains (losses).....00000
10. Total capital gains (losses).....4,764,240(11,565,067)(6,800,827)16,614,1710

DETAILS OF WRITE-INS

0901.00000
0902.00000
0903.00000
0998. Summary of remaining write-ins for Line 9 from overflow page.....00000
0999. Totals (Lines 0901 thru 0903 plus 0998) (Line 9 above).....00000

EXHIBIT OF NONADMITTED ASSETS

	1 Current Year Total Nonadmitted Assets	2 Prior Year Total Nonadmitted Assets	3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D).....	0	0	0
2. Stocks (Schedule D):			
2.1 Preferred stocks.....	0	0	0
2.2 Common stocks.....	179,135	53,820	(125,315)
3. Mortgage loans on real estate (Schedule B):			
3.1 First liens.....	0	0	0
3.2 Other than first liens.....	0	0	0
4. Real estate (Schedule A):			
4.1 Properties occupied by the company.....	0	0	0
4.2 Properties held for the production of income.....	0	0	0
4.3 Properties held for sale.....	0	0	0
5. Cash (Schedule E-Part 1), cash equivalents (Schedule E-Part 2) and short-term investments (Schedule DA).....	0	0	0
6. Contract loans.....	0	0	0
7. Derivatives (Schedule DB).....	0	0	0
8. Other invested assets (Schedule BA).....	25,908,666	23,386,923	(2,521,743)
9. Receivables for securities.....	0	0	0
10. Securities lending reinvested collateral assets (Schedule DL).....	0	0	0
11. Aggregate write-ins for invested assets.....	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	26,087,801	23,440,743	(2,647,058)
13. Title plants (for Title insurers only).....	0	0	0
14. Investment income due and accrued.....	0	0	0
15. Premiums and considerations:			
15.1 Uncollected premiums and agents' balances in the course of collection.....	7,638,870	7,703,156	64,286
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due.....	1,187,196	1,018,808	(168,388)
15.3 Accrued retrospective premiums and contracts subject to redetermination.....	383,991	240,939	(143,052)
16. Reinsurance:			
16.1 Amounts recoverable from reinsurers.....	0	0	0
16.2 Funds held by or deposited with reinsured companies.....	0	0	0
16.3 Other amounts receivable under reinsurance contracts.....	0	0	0
17. Amounts receivable relating to uninsured plans.....	0	0	0
18.1 Current federal and foreign income tax recoverable and interest thereon.....	0	0	0
18.2 Net deferred tax asset.....	28,349,678	31,927,386	3,577,708
19. Guaranty funds receivable or on deposit.....	0	0	0
20. Electronic data processing equipment and software.....	0	0	0
21. Furniture and equipment, including health care delivery assets.....	5,489	8,791	3,302
22. Net adjustment in assets and liabilities due to foreign exchange rates.....	0	0	0
23. Receivables from parent, subsidiaries and affiliates.....	0	0	0
24. Health care and other amounts receivable.....	0	0	0
25. Aggregate write-ins for other than invested assets.....	663,321	763,675	100,354
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	64,316,345	65,103,498	787,152
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....	0	0	0
28. TOTALS (Lines 26 and 27).....	64,316,345	65,103,498	787,152

DETAILS OF WRITE-INS

1101.....	0	0	0
1102.....	0	0	0
1103.....	0	0	0
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	0	0	0
2501. Amounts receivable under high deductible policies.....	399,532	371,135	(28,397)
2502. Other assets nonadmitted.....	263,789	392,540	128,751
2503.....	0	0	0
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	663,321	763,675	100,354

NOTES TO FINANCIAL STATEMENTS

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Accounting Practices:

The Standard Fire Insurance Company (the Company) prepares its statutory financial statements in conformity with accounting practices prescribed or permitted by the State of Connecticut. The State of Connecticut requires that insurance companies domiciled in Connecticut prepare their statutory basis financial statements in accordance with the National Association of Insurance Commissioners (NAIC) *Accounting Practices and Procedures Manual*, subject to any deviations prescribed or permitted by the Connecticut Insurance Commissioner. The Company has not applied for and does not believe that it employs any statutory accounting practices that would be considered a permitted practice in its financial statements.

<u>Net Income</u>	State of <u>Domicile</u>	<u>2015</u>	<u>2014</u>
1. The Standard Fire Insurance Company state basis	CT	\$ 204,845,311	\$ 228,155,481
2. State Prescribed Practices that increase/(decrease) NAIC SAP		-	-
3. State Permitted Practices that increase/(decrease) NAIC SAP		-	-
4. NAIC SAP (1-2-3=4)		<u>\$ 204,845,311</u>	<u>\$ 228,155,481</u>
 <u>Surplus</u>			
5. The Standard Fire Insurance Company state basis	CT	\$ 1,185,543,409	\$ 1,215,172,062
6. State Prescribed Practices that increase/(decrease) NAIC SAP		-	-
7. State Permitted Practices that increase/(decrease) NAIC SAP		-	-
8. NAIC SAP (5-6-7=8)		<u>\$ 1,185,543,409</u>	<u>\$ 1,215,172,062</u>

B. Use of Estimates in the Preparation of the Financial Statements:

The preparation of financial statements requires management to make estimates and assumptions that affect the reported amounts of certain assets and liabilities and disclosure of contingent liabilities at the date of the financial statements and the reported amounts of revenue and losses and expenses during the reporting period. Actual results could differ from those estimates.

C. Accounting Policy:

Certain assets designated as nonadmitted are excluded from the statutory balance sheet and changes in such amounts are charged or credited directly to unassigned funds, a component of surplus as regards policyholders (policyholders' surplus). The costs of acquiring both new and renewal insurance business are charged to income as incurred. Premiums are recognized as revenues pro rata over the policy period. Unearned premium reserves represent the unexpired portion of policy premiums, net of reinsurance. Reserves for losses, loss adjustment expenses (LAE) and unearned premiums ceded to reinsurers have been reported as reductions of the related reserves. Amounts recoverable from reinsurers are estimated in a manner consistent with the loss liability associated with the reinsured business. A liability is established for unsecured, unauthorized reinsurance and overdue authorized reinsurance recoverables.

The provision for federal income taxes is comprised of two components: current income taxes and deferred income taxes. Deferred federal income taxes arise from changes during the year in cumulative temporary differences between the statutory basis and tax basis of assets and liabilities.

Invested assets are valued according to statutory requirements and the bases of valuation adopted by the NAIC.

Cash equivalents consist of short-term, highly liquid investments with original maturities of three months or less.

Short-term investments are stated at amortized cost and consist of investments with remaining maturities of one year or less at the time of acquisition, excluding those investments classified as cash equivalents.

Bonds are generally stated at amortized cost, except bonds that are defined by the NAIC as non-investment grade (NAIC Class 3-6) which are stated at the lower of amortized cost or NAIC fair value. Amortization is calculated using the constant yield method.

Common stocks of non-affiliates are stated at NAIC fair value based on fair values received from the Securities Valuation Office (SVO).

NAIC Class 1 and 2 redeemable preferred stocks generally are stated at amortized cost, whereas NAIC Class 3-6 redeemable preferred stocks are stated at the lower of cost, amortized cost, or NAIC fair value. NAIC Class 1 and 2 non-redeemable preferred stocks generally are stated at NAIC fair value, while NAIC Class 3-6 non-redeemable preferred stocks are stated at the lower of cost or NAIC fair value.

Loan-backed and structured securities are amortized using the retrospective method, except for securities that have incurred a decline in fair value that is other-than-temporary which are amortized using the prospective method. The effective yield used to determine amortization is calculated based on actual historical and projected future cash flows, which are obtained from a nationally recognized securities data provider.

Common stock investments in subsidiaries and affiliated entities are based on the net worth of the entity, determined in accordance with statutory accounting valuation methods. Dividends received from subsidiaries are recorded as net investment income and undistributed net income is recorded as net unrealized capital gains (losses).

The Company's investments in partnerships, joint ventures and limited liability companies are reported using the equity method of accounting, determined in accordance with statutory accounting valuation methods. Distributions of accumulated earnings received from these investments are recorded as net investment income earned and undistributed net income is recorded as net unrealized capital gains (losses).

The Company utilizes anticipated investment income as a factor in the premium deficiency calculation.

Property-casualty reserves are established for loss and LAE and represent management's estimate of the ultimate cost of all unpaid reported and unreported claims incurred and related expenses. In establishing loss and LAE reserves, the Company also takes into account estimated recoveries, reinsurance, salvage and subrogation. The loss and LAE reserves are reviewed regularly by qualified actuaries employed by the Company. The Company continually refines its loss and LAE reserve estimates in a regular ongoing process as historical loss experience develops and additional claims are reported and settled. Because establishment of loss and LAE reserves is an inherently uncertain process involving estimates, currently established reserves may change. The Company reflects adjustments to loss and LAE reserves in the period in which the estimates changed. Such changes in estimates could occur in a future period and may be material to the Company's net income in such period. For a discussion of loss and LAE reserves related to asbestos and environmental reserves, see Note 33.

The Company has not modified its accounting policy regarding the capitalization of fixed assets from the prior period.

NOTES TO FINANCIAL STATEMENTS**2. ACCOUNTING CHANGES AND CORRECTIONS OF ERRORS**

The Company had no material changes in accounting principles or material corrections of errors during 2015.

3. BUSINESS COMBINATIONS AND GOODWILL

Not applicable.

4. DISCONTINUED OPERATIONS

Not applicable.

5. INVESTMENTS**A. Mortgage Loans:**

Not applicable.

B. Debt Restructuring:

Not applicable.

C. Reverse Mortgages:

Not applicable.

D. Loan-Backed Securities:

1. The Company applies the retrospective method of revaluing loan-backed securities. The Company's loan-backed securities are revalued quarterly using the constant effective yield method which includes an adjustment for estimated principal prepayments, if any. The effective yield used to determine amortization for these securities is recalculated and adjusted periodically based upon actual historical and/or projected future cash flows. The Company changes from the retrospective to prospective method for valuing the securities when an other-than-temporary impairment has been recorded.

For collateralized mortgage obligations, asset-backed securities and pass-through certificates prepayment assumptions are adjusted periodically.

When unit prices published by the SVO are not available, the Company uses a nationally recognized pricing service, as well as broker quotes in determining the fair value of its loan-backed securities.

2. Not applicable.

3. The Company had no loan-backed or structured securities with other-than-temporary impairments recognized in 2015.

4. The gross unrealized investment losses and related fair value for impaired securities for which an other-than-temporary impairment has not been recognized as a realized loss were as follows:

- a. The aggregate amount of unrealized losses:

1. Less than 12 Months	\$	125
2. 12 Months or Longer	\$	-

- b. The aggregate related fair value of securities with unrealized losses:

1. Less than 12 Months	\$	68,137
2. 12 Months or Longer	\$	-

5. The Company determines an other-than-temporary impairment by utilizing discounted cash flow modeling to determine the present value of the security and comparing the present value with the amortized cost of the security. If the amortized cost is greater than the present value of the expected cash flows, the difference is considered a credit loss and recognized in net realized capital gains (losses). The Company estimates the present value of the security by projecting future cash flows of the assets underlying the securitization, allocating the flows to the various tranches based on the structure of the securitization, and determining the present value of the cash flows using the effective yield of the security at the date of acquisition (or the most recent implied rate used to accrete the security if the implied rate has changed as a result of a previous impairment or changes in expected cash flows). The Company incorporates levels of delinquencies, defaults and severities as well as credit attributes of the remaining assets in the securitization, along with other economic data, to arrive at its best estimate of the parameters applied to the assets underlying the securitization.

E. Repurchase Agreements and/or Securities Lending Transactions:

1. The Company requires collateral equal to at least 102% of the market value of the loaned security plus accrued interest. The Company accepts only cash as collateral for securities on loan and restricts the manner in which that cash is invested to U.S. Treasury securities and U.S. Treasury repurchase agreements.

At December 31, 2015, The Company had no loaned securities outstanding.

2. Not applicable.

3. Not applicable.

4. Not applicable.

5. Not applicable.

6. Not applicable.

7. Not applicable.

F. Real Estate:

Not applicable.

NOTES TO FINANCIAL STATEMENTS**G. Investments in Low-Income Housing Tax Credits (LIHTC):**

The Company has investments in certain state sponsored LIHTC properties. The state sponsored LIHTC property investments primarily generate premium tax credits which allow the Company to offset premium taxes in Georgia and are projected to be available through 2021. As of December 31, 2015, there were no unfunded commitments related to these LIHTC investments.

During the years ended December 31, 2015 and 2014, \$205,452 and \$207,297, respectively, of tax benefits related to LIHTC were recognized. The balance of the investments in LIHTC at December 31, 2015 and 2014 was \$687,838 and \$802,895, respectively.

Management of the Company is not aware of any of the LIHTC investments and related properties being the subject of any state regulatory reviews.

Current LIHTC investments do not exceed 10% of the Company's total net admitted assets.

H. Restricted Assets:**1. Restricted Assets (Including Pledged)**

Restricted Asset Category	Gross Restricted							8 Total Current Year Admitted Restricted	Percentage	
	Current Year					6 Total From Prior Year	7 Increase / (Decrease) (5 minus 6)		9 Gross Restricted to Total Assets	10 Admitted Restricted to Total Admitted Assets
	1 Total General Account (G/A)	2 G/A Supporting Protected Cell Account Activity (a)	3 Total Protected Cell Account Restricted Assets	4 Protected Cell Account Assets Supporting G/A Activity (b)	5 Total (1 plus 3)					
a. Subject to contractual obligation for which liability is not shown	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	0.0%	0.0%
b. Collateral held under security lending agreements	-	-	-	-	-	1,815,846	(1,815,846)	-	0.0%	0.0%
c. Subject to repurchase agreements	-	-	-	-	-	-	-	-	0.0%	0.0%
d. Subject to reverse repurchase agreements	-	-	-	-	-	-	-	-	0.0%	0.0%
e. Subject to dollar repurchase agreements	-	-	-	-	-	-	-	-	0.0%	0.0%
f. Subject to dollar reverse repurchase agreements	-	-	-	-	-	-	-	-	0.0%	0.0%
g. Placed under option contracts	-	-	-	-	-	-	-	-	0.0%	0.0%
h. Letter stock or securities restricted as to sale - excluding FHLB capital stock	-	-	-	-	-	-	-	-	0.0%	0.0%
i. FHLB capital stock	-	-	-	-	-	-	-	-	0.0%	0.0%
j. On deposit with states	168,533,911	-	-	-	168,533,911	174,694,768	(6,160,857)	168,533,911	4.6%	4.7%
k. On deposit with other regulatory bodies	6,957,337	-	-	-	6,957,337	2,849,410	4,107,927	6,957,337	0.2%	0.2%
l. Pledged as collateral to FHLB (including assets backing funding agreements)	-	-	-	-	-	-	-	-	0.0%	0.0%
m. Pledged as collateral not captured in other categories	-	-	-	-	-	-	-	-	0.0%	0.0%
n. Other restricted assets	-	-	-	-	-	-	-	-	0.0%	0.0%
o. Total Restricted Assets	\$ 175,491,248	\$ -	\$ -	\$ -	\$ 175,491,248	\$ 179,360,024	\$ (3,868,776)	\$ 175,491,248	4.8%	4.9%

(a) Subset of column 1

(b) Subset of column 3

2. Not applicable.

3. Not applicable.

I. Working Capital Finance Investments:

Not applicable.

J. Offsetting and Netting of Assets and Liabilities:

Not applicable.

K. Structured Notes:

Not applicable.

6. JOINT VENTURES, PARTNERSHIPS AND LIMITED LIABILITY COMPANIES

A. Not applicable.

B. Joint ventures, partnerships, and limited liability companies are recorded on a lag basis with changes in the Company's proportional share of equity recorded as an unrealized gain (loss), subject to testing for possible impairment. As part of the impairment testing process, the Company evaluates those assets for other-than-temporary impairments using financial information that is received from the respective joint venture, partnership, or limited liability company. The Company concluded that some of the aforementioned assets, as a result of deteriorating economic conditions, had other-than-temporary impairments and recorded a realized loss of \$7,852,685 with an offsetting entry to change in net unrealized capital gains or (losses). There was no impact to policyholders' surplus as the change in net unrealized capital gains or (losses) was offset by the realized loss of the same amount.

7. INVESTMENT INCOME

A. Policyholders' surplus excludes due and accrued investment income if amounts are over 90 days past due.

B. At December 31, 2015, the Company had no accrued investment income over 90 days past due.

NOTES TO FINANCIAL STATEMENTS

8. DERIVATIVE INSTRUMENTS

Not applicable.

9. INCOME TAXES

A. The components of the net deferred tax asset/(liability) at December 31 are as follows:

	<u>December 31, 2015</u>		
	<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
1. a. Gross deferred tax assets	\$ 85,384,935	\$ 15,443,064	\$ 100,827,999
b. Statutory valuation allowance adjustment	-	-	-
c. Adjusted gross deferred tax assets	85,384,935	15,443,064	100,827,999
d. Deferred tax assets nonadmitted	<u>23,571,023</u>	<u>4,778,655</u>	<u>28,349,678</u>
e. Subtotal net admitted deferred tax assets	61,813,912	10,664,409	72,478,321
f. Deferred tax liabilities	<u>6,642,211</u>	<u>6,832,037</u>	<u>13,474,248</u>
g. Net admitted deferred tax asset/(liability)	<u>\$ 55,171,701</u>	<u>\$ 3,832,372</u>	<u>\$ 59,004,073</u>

	<u>December 31, 2014</u>		
	<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
a. Gross deferred tax assets	\$ 88,313,333	\$ 7,741,799	\$ 96,055,132
b. Statutory valuation allowance adjustment	-	-	-
c. Adjusted gross deferred tax assets	88,313,333	7,741,799	96,055,132
d. Deferred tax assets nonadmitted	<u>28,584,536</u>	<u>3,342,850</u>	<u>31,927,386</u>
e. Subtotal net admitted deferred tax assets	59,728,797	4,398,949	64,127,746
f. Deferred tax liabilities	<u>3,674,617</u>	<u>3,151,476</u>	<u>6,826,093</u>
g. Net admitted deferred tax asset/(liability)	<u>\$ 56,054,180</u>	<u>\$ 1,247,473</u>	<u>\$ 57,301,653</u>

	<u>Change</u>		
	<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
a. Gross deferred tax assets	\$ (2,928,398)	\$ 7,701,265	\$ 4,772,867
b. Statutory valuation allowance adjustment	-	-	-
c. Adjusted gross deferred tax assets	(2,928,398)	7,701,265	4,772,867
d. Deferred tax assets nonadmitted	<u>(5,013,513)</u>	<u>1,435,805</u>	<u>(3,577,708)</u>
e. Subtotal net admitted deferred tax assets	2,085,115	6,265,460	8,350,575
f. Deferred tax liabilities	<u>2,967,594</u>	<u>3,680,561</u>	<u>6,648,155</u>
g. Net admitted deferred tax asset/(liability)	<u>\$ (882,479)</u>	<u>\$ 2,584,899</u>	<u>\$ 1,702,420</u>

2. Admission Calculation Components SSAP No. 101:

	<u>December 31, 2015</u>		
	<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
a. Federal income taxes paid in prior years recoverable through loss carrybacks.	\$ 50,888,936	\$ 3,063,380	\$ 53,952,316
b. Adjusted gross deferred tax assets expected to be realized (excluding the amount of deferred tax assets from 2(a) above) after application of the threshold limitation. (the lesser of 2(b)1 and 2(b)2 below)	4,282,765	768,992	5,051,757
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date.	4,282,765	768,992	5,051,757
2. Adjusted gross deferred tax assets allowed per limitation threshold.	xxxx	xxxx	167,358,469
c. Adjusted gross deferred tax assets (excluding the amount of deferred tax assets from 2(a) and 2(b) above) offset by gross deferred tax liabilities.	6,642,211	6,832,037	13,474,248
d. Deferred tax assets admitted as the result of application of SSAP No. 101.			
Total 2(a) + 2(b)+ 2(c)	<u>61,813,912</u>	<u>10,664,409</u>	<u>72,478,321</u>
Deferred tax liabilities netted against deferred tax assets	<u>6,642,211</u>	<u>6,832,037</u>	<u>13,474,248</u>
Total	<u>\$ 55,171,701</u>	<u>\$ 3,832,372</u>	<u>\$ 59,004,073</u>

	<u>December 31, 2014</u>		
	<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
a. Federal income taxes paid in prior years recoverable through loss carrybacks.	\$ 50,450,801	\$ 1,231,653	\$ 51,682,454
b. Adjusted gross deferred tax assets expected to be realized (excluding the amount of deferred tax assets from 2(a) above) after application of the threshold limitation (the lesser of 2(b)1 and 2(b)2 below).	5,603,379	15,820	5,619,199
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date.	5,603,379	15,820	5,619,199
2. Adjusted gross deferred tax assets allowed per limitation threshold.	xxxx	xxxx	171,197,375

NOTES TO FINANCIAL STATEMENTS

c.	Adjusted gross deferred tax assets (excluding the amount of deferred tax assets from 2(a) and 2(b) above) offset by gross deferred tax liabilities.	3,674,617	3,151,476	6,826,093
d.	Deferred tax assets admitted as the result of application of SSAP No. 101.			
	Total (2(a) + 2(b)+ 2(c))	<u>59,728,797</u>	<u>4,398,949</u>	<u>64,127,746</u>
	Deferred tax liabilities netted against deferred tax assets	<u>3,674,617</u>	<u>3,151,476</u>	<u>6,826,093</u>
	Total	<u>\$ 56,054,180</u>	<u>\$ 1,247,473</u>	<u>\$ 57,301,653</u>
			<u>Change</u>	
		<u>Ordinary</u>	<u>Capital</u>	<u>Total</u>
a.	Federal income taxes paid in prior years recoverable through loss carrybacks.	\$ 438,135	\$ 1,831,727	\$ 2,269,862
b.	Adjusted gross deferred tax assets expected to be realized (excluding the amount of deferred tax assets from 2(a) above) after application of the threshold limitation (the lesser of 2(b)1 and 2(b)2 below).	(1,320,614)	753,172	(567,442)
1.	Adjusted gross deferred tax assets expected to be realized following the balance sheet date.	(1,320,614)	753,172	(567,442)
2.	Adjusted gross deferred tax assets allowed per limitation threshold.	xxxx	xxxx	(3,838,906)
c.	Adjusted gross deferred tax assets (excluding the amount of deferred tax assets from 2(a) and 2(b) above) offset by gross deferred tax liabilities.	2,967,594	3,680,561	6,648,155
d.	Deferred tax assets admitted as the result of application of SSAP No. 101.			
	Total (2(a) + 2(b)+ 2(c))	<u>2,085,115</u>	<u>6,265,460</u>	<u>8,350,575</u>
	Deferred tax liabilities netted against deferred tax assets	<u>2,967,594</u>	<u>3,680,561</u>	<u>6,648,155</u>
	Total	<u>\$ (882,479)</u>	<u>\$ 2,584,899</u>	<u>\$ 1,702,420</u>
		<u>2015</u>	<u>2014</u>	
3. a.	Ratio percentage used to determine recovery period and threshold limitation amount.	518%	537%	
b.	Amount of adjusted capital and surplus used to determine recovery period and threshold limitation in 2(b)2 above.	1,115,723,127	1,141,315,834	
4.	Impact of Tax Planning Strategies:			
		<u>December 31, 2015</u>		
		<u>Ordinary</u>	<u>Capital</u>	
a.	Determination of adjusted gross deferred tax assets and net admitted deferred tax assets, by tax character, as a percentage.			
1.	Adjusted gross deferred tax assets amounts from Note 9A1(c)	85,384,935	15,443,064	
2.	Percentage of adjusted gross deferred tax assets by tax character attributable to the impact of tax planning strategies.	0%	0%	
3.	Net admitted adjusted gross deferred tax assets amounts from Note 9A1(e)	61,813,912	10,664,409	
4.	Percentage of net admitted adjusted gross deferred tax assets by tax character attributable to the impact of tax planning strategies.	0%	0%	
		<u>December 31, 2014</u>		
		<u>Ordinary</u>	<u>Capital</u>	
a.	Determination of adjusted gross deferred tax assets and net admitted deferred tax assets, by tax character, as a percentage.			
1.	Adjusted gross deferred tax assets amounts from Note 9A1(c)	88,313,333	7,741,799	
2.	Percentage of adjusted gross deferred tax assets by tax character attributable to the impact of tax planning strategies.	0%	0%	
3.	Net admitted adjusted gross deferred tax assets amounts from Note 9A1(e)	59,728,797	4,398,949	
4.	Percentage of net admitted adjusted gross deferred tax assets by tax character attributable to the impact of tax planning strategies.	0%	0%	

NOTES TO FINANCIAL STATEMENTS

	<u>Change</u>	
	<u>Ordinary</u>	<u>Capital</u>
a. Determination of adjusted gross deferred tax assets and net admitted deferred tax assets, by tax character, as a percentage.		
1. Adjusted gross deferred tax assets amounts from Note 9A1(c)	(2,928,398)	7,701,265
2. Percentage of adjusted gross deferred tax assets by tax character attributable to the impact of tax planning strategies.	0%	0%
3. Net admitted adjusted gross deferred tax assets amounts from Note 9A1(e)	2,085,115	6,265,460
4. Percentage of net admitted adjusted gross deferred tax assets by tax character attributable to the impact of tax planning strategies.	0%	0%
b. Does the Company's tax-planning strategies include the use of reinsurance?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

B. Deferred tax liabilities not recognized for the following amounts:

Not applicable.

C. The provisions for incurred tax on earnings are as follows:

	<u>December 31, 2015</u>	<u>December 31, 2014</u>	<u>Change</u>
1. Current Income Tax:			
Federal	\$ 60,307,976	\$ 56,751,989	\$ 3,555,987
Foreign	108,484	-	108,484
Subtotal	<u>60,416,460</u>	<u>56,751,989</u>	<u>3,664,471</u>
Federal income taxes on net capital gains	(133,284)	(1,333,261)	1,199,977
Federal and foreign income taxes incurred	<u>\$ 60,283,176</u>	<u>\$ 55,418,728</u>	<u>\$ 4,864,448</u>

2. The tax effects of temporary differences that give rise to significant portions of the deferred tax assets are as follows:

	<u>December 31, 2015</u>	<u>December 31, 2014</u>	<u>Change</u>
<u>Ordinary:</u>			
Discounting of unpaid losses	\$ 33,067,534	\$ 36,027,649	\$ (2,960,115)
Unearned premium reserve	32,054,765	30,914,382	1,140,383
Investments	5,592,276	7,353,725	(1,761,449)
Nonadmitted assets	12,463,610	11,484,556	979,054
Other	<u>2,206,750</u>	<u>2,533,021</u>	<u>(326,271)</u>
Total ordinary deferred tax assets	<u>\$ 85,384,935</u>	<u>\$ 88,313,333</u>	<u>\$ (2,928,398)</u>
Statutory valuation allowance adjustment	-	-	-
Nonadmitted deferred tax assets	<u>23,571,023</u>	<u>28,584,536</u>	<u>(5,013,513)</u>
Admitted ordinary deferred tax assets	<u>\$ 61,813,912</u>	<u>\$ 59,728,797</u>	<u>\$ 2,085,115</u>
<u>Capital:</u>			
Investments	<u>\$ 15,443,064</u>	<u>\$ 7,741,799</u>	<u>\$ 7,701,265</u>
Total capital deferred tax assets	<u>\$ 15,443,064</u>	<u>\$ 7,741,799</u>	<u>\$ 7,701,265</u>
Statutory valuation allowance adjustment	-	-	-
Nonadmitted deferred tax assets	<u>4,778,655</u>	<u>3,342,850</u>	<u>1,435,805</u>
Admitted capital deferred tax assets	<u>\$ 10,664,409</u>	<u>\$ 4,398,949</u>	<u>\$ 6,265,460</u>
Total admitted deferred tax assets:	<u>\$ 72,478,321</u>	<u>\$ 64,127,746</u>	<u>\$ 8,350,575</u>

3. The tax effects of temporary differences that give rise to significant portions of the deferred tax liabilities are as follows:

	<u>December 31, 2015</u>	<u>December 31, 2014</u>	<u>Change</u>
<u>Ordinary:</u>			
Investments	\$ 5,361,211	\$ 136,974	\$ 5,224,237
Fixed assets	1,027,007	3,226,920	(2,199,913)
Guaranty fund assessments	212,656	200,178	12,478
Other	<u>41,337</u>	<u>110,545</u>	<u>(69,208)</u>
Total ordinary deferred tax liabilities	<u>\$ 6,642,211</u>	<u>\$ 3,674,617</u>	<u>\$ 2,967,594</u>
<u>Capital:</u>			
Investments	<u>\$ 6,832,037</u>	<u>\$ 3,151,476</u>	<u>\$ 3,680,561</u>
Total capital deferred tax liabilities	<u>\$ 6,832,037</u>	<u>\$ 3,151,476</u>	<u>\$ 3,680,561</u>
Total deferred tax liabilities:	<u>\$ 13,474,248</u>	<u>\$ 6,826,093</u>	<u>\$ 6,648,155</u>

4. Net admitted deferred tax asset/(liability) \$ 59,004,073 \$ 57,301,653 \$ 1,702,420

5. Deferred income taxes do not include any benefit from investment tax credits.

6. Deferred income taxes do not include a benefit from net operating losses.

7. There are no adjustments to a deferred tax asset or deferred tax liability for enacted changes in tax laws or rates or a change in the tax status of the Company.

8. There are no adjustments to gross deferred tax assets because of a change in circumstances that causes a change in judgment about the realizability of the related deferred tax asset.

NOTES TO FINANCIAL STATEMENTS

9. The change in net deferred income taxes is comprised of the following:

	<u>December 31, 2015</u>	<u>December 31, 2014</u>	<u>Change</u>
Total deferred tax assets	\$ 100,827,999	\$ 96,055,132	\$ 4,772,867
Total deferred tax liabilities	13,474,248	6,826,093	6,648,155
Net deferred tax asset/(liability)	<u>\$ 87,353,751</u>	<u>\$ 89,229,039</u>	(1,875,288)
Tax effect of unrealized gains (losses)			4,309,784
Change in net deferred income tax			<u>\$ 2,434,496</u>

D. The provision for federal and foreign income taxes incurred is different from that which would be obtained by applying the statutory federal income tax rate before income tax. The significant items causing this difference are as follows:

Rate Reconciliation:

	<u>December 31, 2015</u>
Pretax net income (loss)	\$ 265,128,487
Taxes at statutory rate	92,794,970
Increase (decrease) attributable to:	
Nontaxable investment income	(37,817,572)
Other	2,871,282
	<u>\$ 57,848,680</u>
Federal and foreign taxes incurred	\$ 60,283,176
Change in net deferred taxes	(2,434,496)
Total statutory income tax	<u>\$ 57,848,680</u>
Effective tax rate	21.8%

- E. 1. The Company has no net operating loss carryforward available for tax purposes.
2. The Company has \$54,669,779, \$63,856,817, and \$8,958,868 of federal income tax from the current and prior tax years respectively, available for recoupment in the event of future losses.
3. The reporting entity has no protective tax deposits with the Internal Revenue Service under Section 6603 of the Internal Revenue Service Code.
- F. 1. The Company is included in a consolidated federal income tax return with its ultimate parent company, The Travelers Companies, Inc. (TRV). A list of the entities included with the Company in a consolidated federal income tax return filing is attached.
2. The Company is a party to a tax allocation agreement that sets forth the manner in which total consolidated federal income tax is allocated among companies included in the consolidated return. Member companies included in the TRV consolidated return are allocated taxes annually based upon their separate taxable income. Companies with a current federal income tax receivable from TRV will receive settlement to the extent that such receivables are for tax benefits that have been utilized in the consolidated federal income tax return. Member companies are reimbursed by TRV in the event the Internal Revenue Service levies upon a member's assets for unpaid taxes in excess of the amount specifically allocated to a member.

In the event that the consolidated group develops an Alternative Minimum Tax (AMT), each company with an AMT on a separate company basis will be allocated a portion of the consolidated AMT. Settlement of the AMT will be made in the same manner and timing as the regular federal income tax.

G. The Company does not believe it is reasonably possible that the liability related to any federal or foreign tax loss contingencies may significantly increase within the next 12 months.

10. INFORMATION CONCERNING PARENT, SUBSIDIARIES, AFFILIATES AND OTHER RELATED PARTIES

A-C. In June and September 2014, the Company made capital contributions of \$21,244,500 and \$900,000, respectively, to its wholly-owned subsidiary, Oregon Evergreen Investors I LLC.

Schedule Y - Part 2 summarizes the net flow of funds among affiliates for various types of transactions between affiliates. Regulatory prior approval and/or prior notification has been provided for any transaction requiring such action.

The following are general business arrangements that result in or are used for transactions with affiliates in the normal course of business:

- (1) The principal banking functions for the property-casualty operations of TRV and some or all of its affiliated property-casualty insurance companies are handled by The Travelers Indemnity Company (Indemnity). Settlements between the companies are made at least monthly.
 - (2) TRV maintains a private short-term investment pool, known as the Travelers Money Market Liquidity Pool (TRVMMLP), in which affiliated companies may participate. This pool is managed by Indemnity. Each company may convert its position in the pool into cash at any time and may also use its position in the pool to settle transactions with other affiliated participants in the pool. The position of each company in the pool is calculated and adjusted daily. Each participating insurance company carries its share of the pool as a short-term investment in Schedule DA. At December 31, 2015 and 2014, the TRVMMLP totaled \$4.75 billion and \$4.48 billion, respectively.
- D. (1) At December 31, 2015 and 2014, the Company had \$40,271,543 and \$33,617,227 receivable from affiliates, respectively. Substantially all of the accounts between and among the Company and its affiliates are settled at least monthly through the TRVMMLP or in cash.
- (2) The Company participates in an intercompany reinsurance pooling agreement as described in Note 26. The following represents the unsettled balances resulting from affiliated reinsurance that are reported in the respective balance sheet accounts:

	<u>December 31, 2015</u>	<u>December 31, 2014</u>
Amounts recoverable from reinsurers	\$ 98,795,217	\$ 78,432,229
Reinsurance payable on paid losses and LAE	56,300,680	54,140,226
Ceded reinsurance premiums payable	66,648,435	39,869,686

These balances were settled net through the intercompany settlement process during January 2016 and January 2015, respectively.

NOTES TO FINANCIAL STATEMENTS

- E. The Company has not provided any guarantees for the benefit of an affiliate which would result in a material contingent exposure for the Company or any affiliated insurer's assets or liabilities.
- F. Material management or service contracts and cost sharing arrangements, involving the Company or any affiliate, other than cost allocation arrangements:

<u>TYPE OF CONTRACT AND DESCRIPTION</u>	<u>SERVICING COMPANY</u>	<u>OTHER PARTY</u>
Expense Allocation	The Travelers Indemnity Company	Travelers P&C ¹
Reinsurance Allocation	The Travelers Indemnity Company	Travelers P&C ¹

¹ "Travelers P&C" includes The Travelers Indemnity Company and some or all of its insurance subsidiaries and affiliates.

- G. All of the issued and outstanding common stock of the Company is owned by Travelers Insurance Group Holdings Inc. (TIGHI), an indirect subsidiary of TRV, a publicly traded insurance holding company, the organization of which is shown in Schedule Y - Part 1.
- H. Not applicable.
- I. Not applicable.
- J. Not applicable.
- K. Not applicable.
- L. Not applicable.
- M. During 2015, the Company did not make any subsidiary, controlled and affiliated investment Sub I or Sub II filings with the SVO.
- N. Not applicable.

11. DEBT

Not applicable.

12. RETIREMENT PLANS, DEFERRED COMPENSATION, POSTEMPLOYMENT BENEFITS AND COMPENSATED ABSENCES AND OTHER POSTRETIREMENT BENEFIT PLANS**A-D. Defined Benefit Plans:**

Not applicable.

E. Defined Contribution Plans:

Not applicable.

F. Multiemployer Plans:

Not applicable.

G. Consolidated/Holding Company Plans:**1. Employee Retirement Plans:**

The Company participates in a qualified noncontributory defined benefit pension plan sponsored by TRV that provides benefits, primarily under a cash balance formula, for substantially all employees of TRV. In addition the Company participates in nonqualified defined benefit pension plans sponsored by TRV which cover certain highly-compensated employees of TRV. The Company has no legal obligation for benefits under these plans. The Company is charged for its allocable share of pension expense for these plans based on its allocated and/or direct salary costs in accordance with an expense allocation agreement. The Company's allocated share of the pension expense was \$6,097,030 and \$4,750,237 for 2015 and 2014, respectively.

2. Postretirement Benefit Plan:

The Company participates in a postretirement health and life insurance benefit plan sponsored by TRV for employees of TRV that satisfy certain age and service requirements and for certain retirees. The Company has no legal obligation for benefits under this plan. The Company is charged for its allocable share of postretirement benefit expense for this plan based on its allocated and/or direct salary costs in accordance with an expense allocation agreement. The Company's allocated share of the postretirement benefit expense was \$259,341 and \$159,436 for 2015 and 2014, respectively.

3. 401(k) Savings Plan:

The Company participates in a 401(k) savings plan sponsored by TRV for substantially all employees of TRV. The Company has no legal obligation for benefits under this plan. The Company is charged for its allocable share of expense for this plan based on its allocated and/or direct salary costs in accordance with an expense allocation agreement. The Company's allocated share of the 401(k) savings plan expense was \$4,523,382 and \$4,360,689 for 2015 and 2014, respectively.

H. Postemployment Benefits and Compensated Absences:

Not applicable.

I. Impact of Medicare Modernization Act on Postretirement Benefits:

Not applicable.

13. CAPITAL AND SURPLUS, DIVIDEND RESTRICTIONS AND QUASI-REORGANIZATIONS

The Company has 20,000 shares of common capital stock authorized, issued and outstanding with a par value of \$250 per share.

The Company paid ordinary dividends of \$161 million and extraordinary dividends of \$89 million for a total of \$250 million in 2015, to its parent company, TIGHI. In 2014, the Company paid ordinary dividends of \$217.8 million and extraordinary dividends of \$49 million for a total of \$266.8 million to TIGHI.

NOTES TO FINANCIAL STATEMENTS

Dividends to shareholders and the proportion of the profits of the Company that may be paid to shareholders are not limited by charter. The maximum amount of dividends which can be paid by the Company to shareholders without prior approval of the Insurance Commissioner of the State of Connecticut is subject to restrictions relating to statutory surplus or net income. The maximum amount of the dividends to shareholders that can be made during 2016 without prior approval is \$204,845,000.

There are no restrictions on the use of the Company's unassigned funds and such funds are held for the benefit of the shareholder, except for the dividend restrictions indicated above.

The change in the balance of special surplus from retroactive reinsurance is a result of ongoing activity occurring in 2015. See Note 23F for additional detail.

Unassigned funds have been increased by cumulative net unrealized gains of \$361,209,186.

14. LIABILITIES, CONTINGENCIES AND ASSESSMENTS**A. Contingent Commitments:**

At December 31, 2015, the Company had commitments to fund investments of \$57.5 million.

B. Assessments:

1. The Company has accrued liabilities of \$11.6 million for guaranty fund and other insurance-related assessments and related recoverables of \$1.1 million at December 31, 2015. The assessments are expected to be paid over a period ranging from one year to the life expectancy of certain workers' compensation claimants and the recoverables are expected to occur over the same period of time.

2. a. Assets recognized from paid and accrued premium tax offsets December 31, 2014	\$ 780,944
b. Decreases current year:	
Premium tax offset charged off	-
Premium tax offset applied	226,557
Premium tax offset refund	-
c. Increases current year:	
Premium tax offset accrued	<u>432,903</u>
d. Assets recognized from paid and accrued premium tax offsets December 31, 2015	<u>\$ 987,290</u>

C. Gain Contingencies:

On August 17, 2010, in a reinsurance dispute in New York state court captioned *United States Fidelity & Guaranty Company v. American Re-Insurance Company, et al.*, the trial court granted summary judgment for United States Fidelity and Guaranty Company (USF&G) and denied summary judgment for American Re-Insurance Company, a subsidiary of Munich Re (American Re), and three other reinsurers. That summary judgment was largely affirmed on appeal, but the Court of Appeals remanded the case for trial on two discrete issues. On June 3, 2015, the trial court entered orders on pretrial motions filed by all parties in advance of the August 3, 2015 trial date and determined that the issues for trial will be limited to the two discrete issues remanded by the Court of Appeals. The reinsurers appealed the trial court's orders to the Appellate Division, First Department and were granted a stay of the trial date pending the outcome of their appeal. On August 12, 2015, USF&G filed a motion to dismiss the reinsurers' appeal. On October 29, 2015, the Appellate Division denied USF&G's motion to dismiss the reinsurers' appeal, but also unanimously ruled in USF&G's favor and affirmed the rulings limiting the issues for trial to the two discrete issues remanded by the Court of Appeals. On October 30, 2015, the reinsurers appealed the Appellate Division's decision to the New York Court of Appeals. On November 9, 2015, the Clerk of the Court of Appeals directed the parties to submit letter briefs addressing whether the Court of Appeals has jurisdiction to decide the reinsurers' appeal. On November 19, 2015, USF&G and the reinsurers filed their respective letter briefs, and the parties await a decision from the Court of Appeals as to whether the reinsurers' appeal may proceed. At December 31, 2015, the claim totaled \$509 million, comprising \$238 million of reinsurance recoverable plus interest amounting to \$271 million as of that date. Interest will continue to accrue at an annual rate of 9% until the claim is paid.

As USF&G is a participant in the TRV Pool, any amounts recoverable from this claim are subject to participation percentages of the TRV Pool (See Note 26). Accordingly, the Company's respective TRV Pool participation share of the \$238 million awarded by the court represents the amounts owed to and reported by the Company under the terms of the disputed reinsurance contract. The Company's respective Pool participation share of the interest that would be received as part of any judgment ultimately entered in favor of USF&G is treated for accounting purposes as a gain contingency in accordance with SSAP No. 5R, *Liabilities, Contingencies and Impairment of Assets - Revised*, and accordingly has not been recognized in the Company's statutory financial statements.

D. Claims Related Extra Contractual Obligation and Bad Faith Losses Stemming from Lawsuits:

The Company paid the following amounts in the reporting period to settle claims related extra contractual obligations (ECO) or bad faith claims stemming from lawsuits:

	Direct
Claims related ECO and bad faith losses paid during the reporting period	\$ 996,147

Number of claims where amounts were paid to settle claims related ECO or bad faith claims resulting from lawsuits during the reporting period:

26-50 Claims
X

Claim count information provided herein is disclosed on a per claim basis.

E. Product Warranties:

Not applicable.

F. Joint and Several Liabilities:

Not applicable.

NOTES TO FINANCIAL STATEMENTS

G. All Other Contingencies:

The Company has purchased annuities from life insurance companies to fund structured settlements. For a discussion of the Company's contingent liabilities for structured settlements, see Note 27.

In the ordinary course of business, the Company is a defendant or codefendant in various litigation matters. Although there can be no assurances, as of December 31, 2015, the Company believes, based on information currently available, that the ultimate resolution of these legal proceedings would not be likely to have a material adverse effect on its net income, financial condition or liquidity.

For a discussion of contingencies related to asbestos and environmental reserves, see Note 33.

15. LEASES

Not applicable.

16. INFORMATION ABOUT FINANCIAL INSTRUMENTS WITH OFF-BALANCE-SHEET RISK AND FINANCIAL INSTRUMENTS WITH CONCENTRATIONS OF CREDIT RISK

The Company has unfunded commitments to private equity limited partnerships and real estate partnerships in which it invests. The off-balance-sheet risk of these financial instruments was \$57.5 million at December 31, 2015.

17. SALE, TRANSFER AND SERVICING OF FINANCIAL ASSETS AND EXTINGUISHMENTS OF LIABILITIES

A. Transfers of Receivables Reported as Sales:

Not applicable.

B. Transfer and Servicing of Financial Assets:

The Company engages in securities lending activities from which it generates net investment income from the lending of certain of its investments to other institutions for short periods of time. Borrowers of these securities provide collateral equal to at least 102% of the market value of the loaned securities plus accrued interest. This collateral is held by a third party custodian, and the Company has the right to access the collateral only in the event that the institution borrowing the Company's securities is in default under the lending agreement. The loaned securities remain a recorded asset of the Company. The Company accepts only cash as collateral for securities on loan and restricts the manner in which that cash is invested to U.S. Treasury securities and U.S. Treasury repurchase agreements. These securities typically have a duration of 1 day. The Company has no loaned securities outstanding at December 31, 2015.

C. Wash Sales:

Not applicable.

18. GAIN OR LOSS TO THE REPORTING ENTITY FROM UNINSURED PLANS AND THE UNINSURED PORTION OF PARTIALLY INSURED PLANS

Not applicable.

19. DIRECT PREMIUM WRITTEN/PRODUCED BY MANAGING GENERAL AGENTS/THIRD PARTY ADMINISTRATORS

The Company did not have any direct premiums written through managing general agents (as defined in Appendix A-225 of the NAIC *Accounting Practices and Procedures Manual*) or third party administrators.

20. FAIR VALUE MEASUREMENTS

The Company's estimates of fair value for financial assets and financial liabilities are based on the framework established in the fair value accounting guidance. The framework is based on the inputs used in valuation, gives the highest priority to quoted prices in active markets, and requires that observable inputs be used in the valuations when available. The disclosure of fair value estimates in the fair value accounting guidance hierarchy is based on whether the significant inputs into the valuation are observable. In determining the level of the hierarchy in which the estimate is disclosed, the highest priority is given to unadjusted quoted prices in active markets and the lowest priority to unobservable inputs that reflect the Company's significant market assumptions. The level in the fair value hierarchy within which the fair value measurement is reported is based on the lowest level input that is significant to the measurement in its entirety. The three levels of the hierarchy are as follows:

- Level 1 - Unadjusted quoted market prices for identical assets or liabilities in active markets that the Company has the ability to access.
- Level 2 - Quoted prices for similar assets or liabilities in active markets; quoted prices for identical or similar assets or liabilities in inactive markets; or valuations based on models where the significant inputs are observable (e.g., interest rates, yield curves, prepayment speeds, default rates, loss severities, etc.) or can be corroborated by observable market data.
- Level 3 - Valuations based on models where significant inputs are not observable. The unobservable inputs reflect the Company's own assumptions about the inputs that market participants would use.

A. 1. Securities measured and reported at fair value as of December 31, 2015:

Description	Level 1	Level 2	Level 3	Total
Bonds				
Industrial and miscellaneous	\$ -	\$ 3,697,095	\$ 64,206,990	\$ 67,904,085
Common stock				
Industrial and miscellaneous	6,331	-	-	6,331
Total securities at fair value	\$ 6,331	\$ 3,697,095	\$ 64,206,990	\$ 67,910,416

At December 31, 2015, the Company also holds Level 3 non-redeemable preferred stock measured and reported at its fair value of \$0.

There were no significant transfers between Level 1 and Level 2 during the year.

NOTES TO FINANCIAL STATEMENTS

2. Securities measured and reported at fair value using significant unobservable inputs (Level 3):

<u>Description</u>	<u>Beginning Balance at 1/1/2015</u>	<u>Transfers in to Level 3</u>	<u>Transfers out of Level 3</u>	<u>Total gains & (losses) included in Net Income</u>	<u>Total gains & (losses) included in Surplus</u>	<u>Purchases</u>	<u>Issuances</u>	<u>Sales</u>	<u>Settlements</u>	<u>Ending Balance at 12/31/2015</u>
Bonds	\$ 72,644,040	\$ 33,862,831	\$ (38,320,641)	\$ 125,403	\$ (2,465,996)	\$ 7,500	\$ 3,475,000	\$ (485,160)	\$ (4,635,987)	\$ 64,206,990

Due to market fluctuations during the year, securities previously held at cost changed to being held at fair value. These securities were deemed Level 3 securities, resulting in transfers into Level 3.

During the year, market fluctuations caused Level 3 securities to change from being held at fair value to being held at cost, resulting in transfers out as shown above.

3. Market fluctuations cause securities to change from being held at cost to fair value or vice versa. In addition, securities transfer between levels based on the availability of observable market data. The Company recognizes these transfers at the end of the period.

4. Bonds and preferred stock are carried at fair value in accordance with NAIC guidelines. These securities are generally priced by the SVO or by a third party organization.

The Company holds common stock where fair value is based upon market quotations. Accordingly, the fair value for such common stock is included in the amount disclosed in Level 1 of the hierarchy. The market quotations for these securities are provided by the SVO or a third party organization.

5. Not applicable.

B. Not applicable.

C. The following tables provide the aggregate fair value and reported aggregate admitted asset value by type of financial instrument; and the hierarchy level in which the fair values fall.

<u>(At December 31, 2015)</u> <u>Description</u>	<u>Aggregate Fair Value</u>	<u>Admitted Assets</u>	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Not Practicable (Carrying Value)</u>
Short term bonds	\$ 53,726,288	\$ 53,726,288	\$ 18,669,944	\$ 35,056,344	\$ -	\$ -
Long term bonds	2,230,879,019	2,166,159,571	60,635,840	2,087,538,214	82,704,965	-
Preferred stock	-	-	-	-	-	-
Common stock	6,331	6,331	6,331	-	-	-

<u>(At December 31, 2014)</u> <u>Description</u>	<u>Aggregate Fair Value</u>	<u>Admitted Assets</u>	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Not Practicable (Carrying Value)</u>
Cash equivalents	\$ 20,000,000	\$ 20,000,000	\$ -	\$ 20,000,000	\$ -	\$ -
Short term bonds	65,511,456	65,511,456	17,852,287	47,597,931	61,238	-
Long term bonds	2,332,396,843	2,234,939,621	72,888,200	2,162,999,542	96,509,101	-
Preferred stock	-	-	-	-	-	-
Common stock	10,301	10,301	10,301	-	-	-

D. Not applicable.

21. OTHER ITEMS

A. Unusual or Infrequent Items:

Not applicable.

B. Troubled Debt Restructuring – Debtors:

Not applicable.

C. Other Disclosures:

The Company elected to use rounding in reporting amounts in this statement.

2015 Schedule P:

The 2005 and prior "Total Net Losses and Expenses Unpaid" (Schedule P - Part 1, Column 24, Line 1) is separately reported to accident year as follows (in thousands):

<u>Schedule P</u>	<u>Accident Years</u>				
	<u>2005</u>	<u>2004</u>	<u>2003</u>	<u>2002</u>	<u>2001 & Prior</u>
Part 1A	\$ 118	\$ 25	\$ 20	\$ 56	\$ 178
Part 1B	47	18	10	12	10,671
Part 1C	700	757	436	233	2,431
Part 1D	16,981	16,061	17,137	15,413	201,267
Part 1E	1,632	1,278	1,002	788	13,943
Part 1F - Section 1	12	27	120	380	289
Part 1F - Section 2	32	663	76	115	1,759
Part 1G	(4)	29	116	75	3,122
Part 1H - Section 1	3,342	2,817	4,778	3,087	113,925
Part 1H - Section 2	978	502	1,505	793	8,325
Part 1M	-	-	1	-	115
Part 1N	-	6	3	33	1,257
Part 1O	70	163	508	882	19,955
Part 1P	22	24	30	63	347
Part 1R - Section 1	846	1,100	946	1,278	38,223
Part 1R - Section 2	23	29	25	35	534

NOTES TO FINANCIAL STATEMENTS

The following loss and/or LAE reserves have been assumed / (ceded) under retroactive reinsurance agreements. They are reported here by line of business and accident year to facilitate loss discounting under Internal Revenue Code Section 846 (in thousands):

	<u>2002</u>	<u>2001</u>	<u>2000</u>	<u>1999</u>	<u>1998</u>	<u>1997</u>	<u>1996</u>	<u>1995</u>	<u>1994</u>
Commercial Auto	\$ (15)	\$ (11)	\$ (2)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Workers' Compensation	(225)	(223)	(53)	(2,093)	-	(56)	-	-	-
Commercial Multiple Peril	-	-	-	-	-	-	-	-	-
Medical Malpractice - CM	-	-	-	-	-	-	-	-	-
Special Liability	-	-	-	-	-	-	-	-	-
Other Liability - Occ	(68)	-	-	-	-	-	-	-	-
Other Liability - CM	-	(454)	-	-	-	-	-	-	-
Special Property	-	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-	-
Reinsurance A	(22)	-	-	-	-	-	-	-	-
Reinsurance B	(228)	-	-	-	-	-	-	-	-

D. Business Interruption Insurance Recoveries:

Not applicable.

E. State Transferable and Non-transferable Tax Credits:

- Description of State Transferable and Non-transferable Tax Credits

	<u>State</u>	<u>Carrying Value</u>	<u>Unused Amount</u>
Enhanced Capital Tennessee Tax Credit	TN	\$ 1,283,232	\$ 1,274,134
- These credits are utilized per a set schedule as outlined in the purchase agreement.
- Not applicable.
- State Tax Credits Admitted and Nonadmitted:

	<u>Total Admitted</u>	<u>Total Nonadmitted</u>
Transferable	\$ 1,283,232	\$ -
Non-transferable	-	-

F. Subprime Mortgage Related Risk Exposure:

The Company defines subprime mortgage-backed securities as investments which generally contain a majority of loans to borrowers that exhibit one or more of the following characteristics at the time of issuance:

- Low FICO scores,
- Above prime interest rates,
- High loan-to-value ratios,
- High debt-to-income ratios,
- Low loan documentation (e.g. limited or no verification of income and assets), or
- Other characteristics that are inconsistent with conventional underwriting standards employed by government sponsored mortgage entities.

In addition, because of their high loan-to-value ratios, the Company has categorized second-lien mortgage-backed securities as subprime, regardless of the credit characteristics of the borrower on the underlying mortgage.

The Company reviews the credit characteristics of the loans that back these mortgage-backed securities when making the determination to categorize them as subprime exposure. Since the primary purpose of the investment portfolio is to fund future claim payments, the Company employs a conservative investment philosophy. In applying this philosophy to structured securities, including subprime mortgage-backed securities, the Company favors the purchase of senior credit tranches over junior or leveraged credit tranches.

Overall exposure to subprime mortgage-backed securities is sufficiently small in that the Company would likely have other securities available for liquidity needs. The Company utilizes discounted cash flow valuation analysis in its regular, ongoing review of its existing subprime mortgage portfolio, as well as in its analysis of subprime mortgage-backed bonds for purchase. Based upon the credit performance of mortgages within each securitization, the Company projects voluntary prepayments, defaults and loss severity to estimate any expected losses.

Direct exposure through other investments:

	<u>Actual Cost</u>	<u>Book/Adjusted Carrying Value (excluding interest)</u>	<u>Fair Value</u>	<u>Other-Than-Temporary Impairment Losses Recognized</u>
Residential mortgage-backed securities	\$ 3,360,161	\$ 3,343,389	\$ 3,435,343	\$ 22,391

G. Insurance-Linked Securities:

Not applicable.

22. EVENTS SUBSEQUENT

The Company had no material subsequent events through February 15, 2016.

23. REINSURANCE

A. Unsecured Reinsurance Recoverables:

1. Affiliated Company Recoverables:

The Company participates in the TRV Pool and/or other reinsurance programs with affiliates and takes credit for reinsurance ceded directly and indirectly to these companies. The unsecured aggregate recoverables for ceded losses, loss adjustment expenses and unearned premiums at December 31, 2015, in connection with reinsurance agreements among affiliated insurers, were as follows:

NOTES TO FINANCIAL STATEMENTS

Reinsurance balances ceded to pool participants and recoverable by The Travelers Indemnity Company (06-0566050):

<u>Company</u>	<u>F.E.I.N.</u>	<u>Amount</u>
St. Paul Fire and Marine Insurance Company	41-0406690	\$ 11,476,692,479
Travelers Casualty and Surety Company	06-6033504	9,430,629,981
The Phoenix Insurance Company	06-0303275	2,313,500,954
The Standard Fire Insurance Company	06-6033509	2,243,182,451
United States Fidelity and Guaranty Company	52-0515280	2,050,687,854
Travelers Casualty Insurance Company of America	06-0876835	1,263,109,817
Farmington Casualty Company	06-1067463	684,816,825
The Travelers Indemnity Company of Connecticut	06-0336212	635,785,141
The Automobile Insurance Company of Hartford, Connecticut	06-0848755	633,812,563
The Charter Oak Fire Insurance Company	06-0291290	589,564,660
Northland Insurance Company	41-6009967	565,653,251
St. Paul Surplus Lines Insurance Company	41-1230819	407,120,473
The Travelers Indemnity Company of America	58-6020487	357,848,690
St. Paul Protective Insurance Company	36-2542404	268,397,452
Northfield Insurance Company	41-0983992	240,571,180
Travelers Commercial Casualty Company	95-3634110	217,474,396
Travelers Commercial Insurance Company	06-1286268	217,439,335
Travelers Casualty Company of Connecticut	06-1286266	217,439,335
St. Paul Mercury Insurance Company	41-0881659	197,235,553
Travelers Property Casualty Company of America	36-2719165	183,169,227
Travelers Property Casualty Insurance Company	06-1286274	138,791,059
The Travelers Casualty Company	41-1435765	134,164,689
Travelers Constitution State Insurance Company	41-1435766	134,164,689
Travelers Personal Security Insurance Company	06-1286264	124,911,951
Travelers Personal Insurance Company	36-3703200	124,911,951
Travelers Excess and Surplus Lines Company	06-1203698	124,911,951
TravCo Insurance Company	35-1838077	124,911,951
The Travelers Home and Marine Insurance Company	35-1838079	124,911,951
Discover Property & Casualty Insurance Company	36-2999370	66,132,201
Discover Specialty Insurance Company	52-1925132	64,769,151
Northland Casualty Company	94-6051964	64,769,151
Fidelity and Guaranty Insurance Underwriters, Inc.	52-0616768	46,372,189
St. Paul Guardian Insurance Company	41-0963301	46,263,675
American Equity Specialty Insurance Company	86-0868106	46,263,675
Total		<u>\$ 35,560,381,851</u>

Reinsurance balances assumed by The Travelers Indemnity Company and recoverable by the following pool participants:

<u>Company</u>	<u>F.E.I.N.</u>	<u>Amount</u>
Travelers Property Casualty Company of America	36-2719165	\$ 11,515,201,476
St. Paul Fire and Marine Insurance Company	41-0406690	3,915,121,272
Travelers Casualty and Surety Company	06-6033504	3,055,257,848
The Travelers Indemnity Company of America	58-6020487	3,025,970,040
The Travelers Indemnity Company of Connecticut	06-0336212	2,843,738,482
The Charter Oak Fire Insurance Company	06-0291290	2,793,708,575
The Phoenix Insurance Company	06-0303275	2,259,436,735
The Standard Fire Insurance Company	06-6033509	2,168,776,118
The Travelers Home and Marine Insurance Company	35-1838079	2,165,916,971
United States Fidelity and Guaranty Company	52-0515280	1,778,227,383
Travelers Casualty Insurance Company of America	06-0876835	1,709,522,682
St. Paul Mercury Insurance Company	41-0881659	1,010,089,193
Farmington Casualty Company	06-1067463	677,796,690
The Automobile Insurance Company of Hartford, Connecticut	06-0848755	586,939,850
Northland Insurance Company	41-6009967	522,251,104
Fidelity and Guaranty Insurance Underwriters, Inc.	52-0616768	460,060,520
Discover Property & Casualty Insurance Company	36-2999370	417,756,805
Travelers Commercial Insurance Company	06-1286268	407,800,854
Travelers Property Casualty Insurance Company	06-1286274	342,614,135
TravCo Insurance Company	35-1838077	263,205,083
St. Paul Surplus Lines Insurance Company	41-1230819	231,074,614
St. Paul Protective Insurance Company	36-2542404	212,190,532
Northfield Insurance Company	41-0983992	206,191,313
Travelers Excess and Surplus Lines Company	06-1203698	195,646,796
Travelers Personal Security Insurance Company	06-1286264	166,025,987
St. Paul Guardian Insurance Company	41-0963301	131,859,881
Travelers Personal Insurance Company	36-3703200	114,523,922
Travelers Commercial Casualty Company	95-3634110	91,233,436
Travelers Casualty Company of Connecticut	06-1286266	61,199,249
Northland Casualty Company	94-6051964	19,352,350
Discover Specialty Insurance Company	52-1925132	8,335,548
The Travelers Casualty Company	41-1435765	4,797,137
Travelers Constitution State Insurance Company	41-1435766	2,797,723
American Equity Specialty Insurance Company	86-0868106	207,056
Total		<u>\$ 43,364,827,360</u>

2. Unaffiliated Company Recoverables:

Not applicable.

B. Reinsurance Recoverable in Dispute:

Not applicable.

NOTES TO FINANCIAL STATEMENTS

C. Reinsurance Assumed and Ceded:

	Assumed Reinsurance		Ceded Reinsurance		Net	
	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity
Affiliates	\$ 457,925,236	\$ 62,504,774	\$ 933,926,984	\$ 127,476,912	\$ (476,001,748)	\$ (64,972,138)
All Other	157,746,120	21,531,649	-	-	157,746,120	21,531,649
Total	<u>\$ 615,671,356</u>	<u>\$ 84,036,423</u>	<u>\$ 933,926,984</u>	<u>\$ 127,476,912</u>	<u>\$ (318,255,628)</u>	<u>\$ (43,440,489)</u>

Direct Unearned Premium Reserve \$ 776,180,864

2. Accruals for contingent, sliding scale adjustment and other profit sharing commissions, net of reinsurance assumed and ceded, amounted to \$10,349,176 at December 31, 2015. This balance represents the Company's 4.84% pro rata share of the net amount of the TRV Pool (see Note 26):

	Direct	Assumed	Ceded	Net
a. Contingent Commission	\$ 25,811,772	\$ 10,349,176	\$ 25,811,772	\$ 10,349,176
b. Sliding Scale Adjustments	-	-	-	-
c. Other Profit Commission Arrangements	-	-	-	-
d. Total	<u>\$ 25,811,772</u>	<u>\$ 10,349,176</u>	<u>\$ 25,811,772</u>	<u>\$ 10,349,176</u>

D. Uncollectible Reinsurance:

Not applicable.

E. Commutation of Ceded Reinsurance:

Not applicable.

F. Retroactive Reinsurance:

	Assumed	Ceded
a. Reserves Transferred:		
(1) Initial Reserves	\$ 454,960	\$ 23,490,099
(2) Adjustments - Prior Year(s)	(127,376)	8,765,338
(3) Adjustments - Current Year	(43,665)	(172,538)
(4) Current Total	<u>\$ 283,919</u>	<u>\$ 32,082,899</u>
b. Consideration Paid or Received:		
(1) Initial Consideration	\$ 506,026	\$ 20,814,918
(2) Adjustments - Prior Year(s)	45,780	1,767,215
(3) Adjustments - Current Year	131	4,726
(4) Current Total	<u>\$ 551,937</u>	<u>\$ 22,586,859</u>
c. Paid Losses Reimbursed or Recovered:		
(1) Prior Year(s)	\$ 219,378	\$ 28,066,432
(2) Current Year	5,408	452,834
(3) Current Total	<u>\$ 224,786</u>	<u>\$ 28,519,266</u>
d. Special Surplus From Retroactive Reinsurance:		
(1) Initial Surplus Gain or Loss	\$ 51,066	\$ 2,675,181
(2) Adjustments - Prior Year(s)	173,156	6,998,123
(3) Adjustments - Current Year	43,796	(177,264)
(4) Current Year Restricted Surplus	268,018	3,240,349
(5) Cumulative Total Transferred to Unassigned Funds	<u>\$ -</u>	<u>\$ 6,255,691</u>

- e. List the other insurers included in the above transactions:

Company	Assumed	Ceded
Munich Reinsurance America, Inc. (10227)	\$ 261,360	\$ -
General Reinsurance Corporation (22039)	-	15,098,002
Renaissance Reinsurance U.S. Inc. (10357)	-	4,450,650
XL Reinsurance America Inc. (20583)	-	3,816,966
TIG Insurance Company (25534)	-	3,630,328
Swiss Reinsurance America Corporation (25364)	-	1,367,170
Westport Insurance Corporation (39845)	-	825,665
Commercial Risk Reinsurance Co. Ltd. (AA-3190433)	-	648,560
Excalibur Reinsurance Corp. (39675)	-	528,227
Various	22,559	1,717,331
Total	<u>\$ 283,919</u>	<u>\$ 32,082,899</u>

- f. Paid Loss/LAE Recoverable:

1. Authorized Reinsurers

Company	Total Paid Loss/LAE Recoverable	Amount Over 90 Days Past Due
XL Reinsurance America Inc. (20583)	\$ 32,475	\$ -
Westport Insurance Corporation (39845)	9,028	-
General Reinsurance Corporation (22039)	8,192	8,192
Renaissance Reinsurance U.S. Inc. (10357)	2,864	-
Swiss Reinsurance America Corporation (25364)	607	607
Various	4,338	116
Total	<u>\$ 57,504</u>	<u>\$ 8,915</u>

NOTES TO FINANCIAL STATEMENTS

2. Unauthorized Reinsurers

<u>Company</u>	Total Paid Loss/LAE <u>Recoverable</u>	Amount Over 90 Days <u>Past Due</u>	Collateral <u>Held</u>
Excalibur Reinsurance Corp. (39675)	\$ 55,371	\$ 55,273	\$ -
Total	<u>\$ 55,371</u>	<u>\$ 55,273</u>	<u>\$ -</u>

G. Reinsurance Accounted for as a Deposit:

Not applicable.

H. Disclosures for the Transfer of Property and Casualty Run-off Agreements:

Not applicable.

I. Certified Reinsurer Rating Downgraded or Status Subject to Revocation:

Not applicable.

J. Reinsurance Agreements Qualifying for Reinsurer Aggregation:

Not applicable.

24. RETROSPECTIVELY RATED CONTRACTS AND CONTRACTS SUBJECT TO REDETERMINATION

A. Accrued retrospective premiums (Page 2, Line 15.3) have been determined based upon loss experience on business subject to such experience rating adjustment. Accrued retrospectively rated premiums, including all of those relating to bulk IBNR, have been determined by or allocated to individual policyholder accounts. Ten percent of the amount not offset by retrospective return premiums, other liabilities to the same party (other than loss and loss expense reserves), or collateral as permitted by SSAP No. 66, *Retrospectively Rated Contracts*, has been nonadmitted. The amount shown in Part E below is the Company's proportionate share of the accrued retrospective premiums of the TRV Pool (see Note 26).

B. The Company records accrued retrospective premium as an adjustment to earned premium.

C. See Schedule P - Part 7A.

D. Not applicable.

E. Calculation of nonadmitted retrospective premium:

1. Total accrued retrospective premium	\$ 4,256,181
2. Unsecured amount	1,045,122
3. Less: Nonadmitted amount (10%)	104,512
4. Less: Nonadmitted for any person for whom agents' balances or uncollected premiums are nonadmitted	<u>279,479</u>
5. Admitted amount (1) - (3) - (4)	<u>\$ 3,872,190</u>

F. Not applicable.

25. CHANGES IN INCURRED LOSSES AND LOSS ADJUSTMENT EXPENSES

During the period from January 1, 2015 to December 31, 2015, the prior year-end total loss and LAE reserves developed favorably by \$31,878,000, resulting from better than expected loss and defense and cost containment development primarily in the other liability – occurrence (excluding asbestos and environmental), workers' compensation, homeowners, special property, private passenger auto liability and fidelity & surety lines. This favorable development was partially offset by unfavorable development for asbestos and environmental loss and LAE reserves in the other liability – occurrence line.

The improvement was driven primarily by better than expected loss experience in (i) the other liability – occurrence line for both primary and excess coverages for accident years 2005 through 2014 reflecting a more favorable legal environment than the Company previously expected, (ii) the workers' compensation line for accident years 2006 and "Prior", (iii) the homeowners line for liability coverages for accident years 2011 through 2014 and for non-catastrophe losses for accident year 2014, (iv) the special property line related to catastrophe losses for accident years 2011, 2012 and 2014; and non-catastrophe losses for accident years 2013 and 2014, (v) the private passenger auto liability line for accident years 2012 through 2014 and (vi) the fidelity & surety line for accident years 2007 through 2014. These improvements were partially offset by unfavorable development in asbestos and environmental reserves in the other liability – occurrence and products liability – occurrence lines for "Prior" accident years.

Additionally, the allocation of IBNR reserves between the other liability – occurrence and products liability – occurrence was reviewed with regard to asbestos and construction defect exposures. As a result of that review, there was a shift of IBNR reserves from products liability – occurrence to other liability – occurrence for the "Prior" accident year and from the other liability – occurrence to products liability – occurrence for more recent accident years.

The remaining changes are generally the result of ongoing analyses of recent loss data and trends. A portion of the change from prior year effects relates to retrospectively rated policies which are subject to premium adjustments.

26. INTERCOMPANY POOLING ARRANGEMENTS

The Company is a participant in the TRV Pool, an intercompany pooling arrangement. The lead company of the TRV Pool is Indemnity. Under the terms of the arrangement, the property-casualty underwriting risks for substantially all lines of business of the intercompany pool participants are reinsured with Indemnity. The pool of net underwriting risks remaining after reinsurance is transacted with third parties by Indemnity is then retroceded to the pool participants based on pool participation percentages. The provision for reinsurance and the write-off of uncollectible reinsurance are reported in the statutory financial statements of Indemnity and are not allocated to the other pool participants.

NOTES TO FINANCIAL STATEMENTS

The names, NAIC company codes and intercompany pool percentages of the companies participating in the TRV Pool are as follows:

<u>TRV Pool Participant</u>	<u>NAIC Company Code</u>	<u>Pool Participation %</u>
St. Paul Fire and Marine Insurance Company	24767	24.79
The Travelers Indemnity Company	25658	23.29
Travelers Casualty and Surety Company	19038	20.36
The Phoenix Insurance Company	25623	5.00
The Standard Fire Insurance Company	19070	4.84
United States Fidelity and Guaranty Company	25887	4.41
Travelers Casualty Insurance Company of America	19046	2.73
Farmington Casualty Company	41483	1.48
The Automobile Insurance Company of Hartford, Connecticut	19062	1.37
The Travelers Indemnity Company of Connecticut	25682	1.37
The Charter Oak Fire Insurance Company	25615	1.27
Northland Insurance Company	24015	1.22
St. Paul Surplus Lines Insurance Company	30481	0.88
The Travelers Indemnity Company of America	25666	0.77
St. Paul Protective Insurance Company	19224	0.58
Northfield Insurance Company	27987	0.52
Travelers Casualty Company of Connecticut	36170	0.47
Travelers Commercial Casualty Company	40282	0.47
Travelers Commercial Insurance Company	36137	0.47
St. Paul Mercury Insurance Company	24791	0.40
Travelers Property Casualty Company of America	25674	0.36
Travelers Property Casualty Insurance Company	36161	0.30
The Travelers Casualty Company	41769	0.29
Travelers Constitution State Insurance Company	41750	0.29
TravCo Insurance Company	28188	0.27
Travelers Excess and Surplus Lines Company	29696	0.27
The Travelers Home and Marine Insurance Company	27998	0.27
Travelers Personal Insurance Company	38130	0.27
Travelers Personal Security Insurance Company	36145	0.27
Discover Property & Casualty Insurance Company	36463	0.14
Discover Specialty Insurance Company	10213	0.14
Northland Casualty Company	24031	0.14
American Equity Specialty Insurance Company	10819	0.10
Fidelity and Guaranty Insurance Underwriters, Inc.	25879	0.10
St. Paul Guardian Insurance Company	24775	0.10

All of the above TRV Pool companies are party to reinsurance agreements with non-affiliated reinsurers covering business subject to the pooling agreement and have contractual rights of direct recovery from the non-affiliated reinsurers under the terms of such reinsurance agreements.

As of December 31, 2015 the Company had a \$24,153,897 net payable to affiliates as a result of its intercompany reinsurance transactions which settled in January 2016.

27. STRUCTURED SETTLEMENTS

The Company has purchased annuities from life insurance companies, under which the claimant is the payee and the Company is contingently liable as the owner of the annuity contract, to fund structured settlements. These annuity contracts are now the direct responsibility of the life insurance companies from whom they have been purchased and claims settled by the purchase of such annuity contracts are treated as closed claims. In the event that the life insurance company fails to make the required annuity payments, the Company would be required to make such payments if and to the extent the purchased annuities are not covered by state guaranty associations.

The following data represents the Company's proportionate share of structured settlement annuities purchased by members of the TRV Pool (see Note 26):

A.	<u>Loss Reserves</u> <u>Eliminated by Annuities</u> \$ 142,830,722	<u>Unrecorded Loss</u> <u>Contingencies</u> \$ 142,830,722	
B.	<u>Life Insurance Company and Location</u>	<u>Licensed in Company's</u> <u>State of Domicile</u>	<u>Statement</u> <u>Value of Annuities</u>
	Fidelity & Guaranty Life Insurance Company, Baltimore, MD	Yes	\$ 42,045,321
	MetLife Insurance Company USA, Charlotte, NC	Yes	15,140,923
	Genworth Life Insurance Company, Richmond, VA	Yes	10,702,164
	Symetra Life Insurance Company, Bellevue, WA	Yes	10,143,544
	Genworth Life and Annuity Insurance Company, Richmond, VA	Yes	9,830,050
	All other companies		54,968,720

28. HEALTH CARE RECEIVABLES

Not applicable.

29. PARTICIPATING POLICIES

Not applicable.

30. PREMIUM DEFICIENCY RESERVES

1. Liability carried for premium deficiency reserves	\$	0
2. Date of the most recent evaluation of this liability	December 31, 2015	
3. Was anticipated investment income utilized in the calculation?		Yes

31. HIGH DEDUCTIBLES

At December 31, 2015 the amount of reserve credit recorded by the Company for high deductible policies on unpaid claims was \$259,125,246 and the amount billed and outstanding on paid claims was \$2,632,509. These amounts represent the Company's proportionate share of the TRV Pool (see Note 26).

NOTES TO FINANCIAL STATEMENTS**32. DISCOUNTING OF LIABILITIES FOR UNPAID LOSSES OR UNPAID LOSS ADJUSTMENT EXPENSES**

- A. The Company establishes and reports tabular workers' compensation case reserves consistent with statistical reporting requirements, as described below. The total reserve (case plus IBNR/Bulk) for these claims is consistent with the Company's own evaluation of the ultimate payout and a 5% discount rate.

Except for certain third party administered claims, tabular workers' compensation case reserves have been discounted in accordance with state approved workers' compensation statistical plans. The tabular case reserves, as included in Schedule P, reflect a discount rate of 3.5% or as specified by state requirements, generally using the following United States Life Tables:

Non-Fatal Cases:	United States Life Tables Total Population 2007 – FL United States Life Tables Total Male or Total Female 2009 – MA & MN United States Life Tables Total Male or Total Female Population 1999 – MA(USL) United States Life Tables Total Male or Total Female 2007 – all other states
Fatal Cases:	New York Mandated Mortality & Remarriage Table – NY United States Life Tables Total Female 2009 – MA & MN ** United States Life Tables Total Female 1999 – MA(USL) * * and the 1980 Railroad Retirement Board Remarriage Table United States Life Tables Total Female 2007 – all other states ** ** and the 1997 Railroad Retirement Board Remarriage Table

Other liability reserves related to annuity obligations from structured settlements are discounted using a discount rate of 5% and reflect the 1983 Individual Annuity Mortality table adjusted for impairment and future mortality improvement.

The Company develops loss reserve estimates for workers' compensation tabular claims that are expectations of what the ultimate settlement costs for these claims will be upon final resolution in the future. These estimates are based on the Company's assessment of facts and circumstances currently known and, using Company experience, multiple actuarial estimation methods. This includes estimates of payment patterns reflecting actual mortality, morbidity and settlement history that relate both to claims currently identified as tabular as well as claims not yet identified as tabular ("IBNR" tabular).

The total reserves and the corresponding discount that the Company has established for these claims reflects these multiple estimation methods, payment patterns and a discount rate of 5%. The liabilities and discount amounts shown below reflect estimates of the ultimate liability for tabular claims. Furthermore, the case vs. IBNR discount amounts shown below each reflects estimates of the ultimate resolution costs for these claims: case amounts for claims already identified as tabular; IBNR amounts for claims yet to be identified as tabular.

The December 31, 2015 liabilities of the Company included \$88,299,527 and \$5,296,333 of such discounted liabilities related to workers' compensation and other liability-occurrence reserves, respectively. The amount of discount for case and IBNR reserves at December 31, 2015 is as follows:

Tabular Discount

	<u>Schedule P Lines of Business</u>	<u>Tabular Discount Included in Schedule P, Part 1 *</u>	
		<u>Case</u>	<u>IBNR</u>
1.	Workers' Compensation	\$ 17,473,174	\$ 21,637,401
2.	Other Liability-Occurrence	539,466	7,785,285
3.	Total	<u>\$ 18,012,640</u>	<u>\$ 29,422,686</u>

* Excludes medical loss reserves and all loss adjustment expense reserves

- B. Non-tabular reserves have not been discounted.
- C. No changes in the rates or other key assumptions used to discount prior accident year reserves have been made.

33. ASBESTOS/ENVIRONMENTAL RESERVES

The following represents the Company's allocable share of the pooled property-casualty business of the TRV Pool, based on its pro rata participation percentage of 4.84%.

- A. Does the Company have on the books or has it ever written an insured for which you have identified a potential for the existence of a liability due to asbestos losses? Yes (X) No ()

Exposure for asbestos losses arises from liability coverage written many years ago. The exposures include bodily injury and property damage losses.

Because each policyholder presents different liability and coverage issues, the Company generally reviews the exposure presented by each policyholder at least annually. Among the factors which the Company may consider in the course of this review are: available insurance coverage, including the role of any umbrella or excess insurance the Company has issued to the policyholder; limits and deductibles; an analysis of the policyholder's potential liability; the jurisdictions involved; past and anticipated future claim activity and loss development on pending claims; past settlement values of similar claims; allocated claim adjustment expense; potential role of other insurance; the role, if any, of non-asbestos claims or potential non-asbestos claims in any resolution process; and applicable coverage defenses or determinations, if any, including the determination as to whether or not an asbestos claim is a products/completed operation claim subject to an aggregate limit and the available coverage, if any, for that claim.

The Company continues to be involved in coverage litigation concerning a number of policyholders, some of whom have filed for bankruptcy, who in some instances have asserted that all or a portion of their asbestos-related claims are not subject to aggregate limits on coverage. In these instances, policyholders also may assert that each individual bodily injury claim should be treated as a separate occurrence under the policy. It is difficult to predict whether these policyholders will be successful on both issues. To the extent both issues are resolved in a policyholder's favor and other Company defenses are not successful, the Company's coverage obligations under the policies at issue would be materially increased and bounded only by the applicable per-occurrence limits and the number of asbestos bodily injury claims against the policyholders. Although the Company has seen a moderation in the overall risk associated with these lawsuits, it remains difficult to predict the ultimate cost of these claims.

The Company's quarterly asbestos reserve reviews include an analysis of exposure and claim payment patterns by policyholder category, as well as recent settlements, policyholder bankruptcies, judicial rulings and legislative actions. The Company also analyzes developing payment patterns among policyholders as well as projected reinsurance billings and recoveries. In addition, the Company reviews its historical gross and net loss and expense paid experience, year-by-year, to assess any emerging trends,

NOTES TO FINANCIAL STATEMENTS

fluctuations, or characteristics suggested by the aggregate paid activity. Conventional actuarial methods are not utilized to establish asbestos reserves nor have the Company's evaluations resulted in any way of determining a meaningful average asbestos defense or indemnity payment.

In January 2015, pursuant to an order issued by a federal bankruptcy court, Travelers Property Casualty Corp. made a payment in the amount of \$579 million for the settlement of litigation that had commenced in 2001 and 2002 related to the handling and settlement of asbestos claims and the alleged violation of purported common law duties to third parties. The payment was comprised of the \$502 million settlement amount, plus pre-judgment and post-judgment interest totaling \$77 million. The Company's allocable share of this payment was fully accrued in its financial statements at December 31, 2014. The Company's allocable share of the payment of the settlement amount resulted in a \$24.3 million decrease to the Company's direct asbestos reserves and a \$23.1 million decrease to the Company's net of ceded reinsurance asbestos reserves.

1. <u>Direct Basis – Asbestos:</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
a. Beginning reserves:	\$ 132,488,153	\$ 123,680,687	\$ 118,727,555	\$ 115,218,033	\$ 112,484,936
b. Incurred losses and LAE:	6,776,000	6,209,720	8,416,760	12,231,116	14,597,440
c. Calendar year payments for losses and LAE:	<u>15,583,466</u>	<u>11,162,852</u>	<u>11,926,282</u>	<u>14,964,213</u>	<u>39,420,986</u>
d. Ending reserves:	<u>\$ 123,680,687</u>	<u>\$ 118,727,555</u>	<u>\$ 115,218,033</u>	<u>\$ 112,484,936</u>	<u>\$ 87,661,390</u>
2. <u>Assumed Reinsurance Basis- Asbestos:</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
a. Beginning reserves:	\$ 9,762,971	\$ 10,790,254	\$ 10,878,217	\$ 10,430,409	\$ 9,014,498
b. Incurred losses and LAE:	2,662,000	1,582,680	779,240	256,084	358,160
c. Calendar year payments for losses and LAE:	<u>1,634,717</u>	<u>1,494,717</u>	<u>1,227,048</u>	<u>1,671,995</u>	<u>1,358,801</u>
d. Ending reserves:	<u>\$ 10,790,254</u>	<u>\$ 10,878,217</u>	<u>\$ 10,430,409</u>	<u>\$ 9,014,498</u>	<u>\$ 8,013,857</u>
3. <u>Net of Ceded Reinsurance Basis- Asbestos:</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
a. Beginning reserves:	\$ 123,215,255	\$ 117,958,344	\$ 114,525,328	\$ 113,238,117	\$ 113,589,280
b. Incurred losses and LAE:	8,470,000	7,986,000	9,196,000	12,100,000	10,648,000
c. Calendar year payments for losses and LAE:	<u>13,726,911</u>	<u>11,419,016</u>	<u>10,483,211</u>	<u>11,748,837</u>	<u>37,237,355</u>
d. Ending reserves:	<u>\$ 117,958,344</u>	<u>\$ 114,525,328</u>	<u>\$ 113,238,117</u>	<u>\$ 113,589,280</u>	<u>\$ 86,999,925</u>

B. Ending loss and LAE reserves for unreported claims included in Part A above:

1. Direct Basis:	\$ 67,896,067
2. Assumed Reinsurance Basis:	\$ 2,276,819
3. Net of Ceded Reinsurance Basis:	\$ 64,624,312

C. Ending LAE reserves for reported and unreported claims included in Part A above:

1. Direct Basis:	\$ 31,808,501
2. Assumed Reinsurance Basis:	\$ 124,850
3. Net of Ceded Reinsurance Basis:	\$ 30,416,494

D. Does the Company have on the books or has it ever written an insured for which you have identified a potential for the existence of a liability due to environmental losses? Yes (X) No ()

Exposure for environmental losses arises from liability coverage written many years ago. The exposures include bodily injury and property damage losses.

The resolution of environmental exposures by the Company generally occurs through settlements with policyholders as opposed to claimants. Generally, the Company strives to extinguish any obligations it may have under any policy issued to the policyholder for past, present and future environmental liabilities and extinguish any pending coverage litigation dispute with the policyholder. This form of settlement is commonly referred to as a "buy-back" of policies for future environmental liability. In addition, many of the agreements have also extinguished any insurance obligation which the Company may have for other claims, including but not limited to asbestos and other cumulative injury claims. The Company and its policyholders may also agree to settlements which extinguish any liability arising from known specified sites or claims. Where appropriate, these agreements also include indemnities and hold harmless provisions to protect the Company. The Company's general purpose in executing these agreements is to reduce the Company's potential environmental exposure and eliminate the risks presented by coverage litigation with the policyholder and related costs.

In establishing environmental reserves, the Company evaluates the exposure presented by each policyholder and the anticipated cost of resolution, if any. In the course of this analysis, the Company generally considers the probable liability, available coverage and relevant judicial interpretations. In addition, the Company considers the many variables presented, such as: the nature of the alleged activities of the policyholder at each site; the number of sites; the total number of potentially responsible parties at each site; the nature of the alleged environmental harm and the corresponding remedy at each site; the nature of government enforcement activities at each site; the ownership and general use of each site; the overall nature of the insurance relationship between the Company and the policyholder, including the role of any umbrella or excess insurance the Company has issued to the policyholder; the involvement of other insurers; the potential for other available coverage, including the number of years of coverage; the role, if any, of non-environmental claims or potential non-environmental claims in any resolution process; and the applicable law in each jurisdiction. The evaluation of the exposure presented by a policyholder can change as information concerning that policyholder and the many variables presented is developed. Conventional actuarial methods are not used to estimate these reserves.

In its review of environmental reserves, the Company considers: past settlement payments; changing judicial and legislative trends; its reserves for the costs of litigating environmental coverage matters; the potential for policyholders with smaller exposures to be named in new clean-up actions for both on- and off-site waste disposal activities; the potential for adverse development; the potential for additional new claims beyond previous expectations; and the potential higher costs for new settlements.

The majority of the net environmental reserve is carried in a bulk reserve which includes unresolved environmental claims, incurred but not reported environmental claims and the anticipated cost of coverage litigation disputes relating to these claims. The bulk reserve the Company carries is established and adjusted based upon the aggregate volume of in-process environmental claims and the Company's experience in resolving those claims. The balance of the net environmental reserve consists of case reserves.

1. <u>Direct Basis – Environmental:</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
a. Beginning reserves:	\$ 14,585,571	\$ 14,006,955	\$ 13,724,833	\$ 13,235,355	\$ 13,296,098
b. Incurred losses and LAE:	3,194,400	3,830,860	3,385,096	4,394,720	3,913,140
c. Calendar year payments for losses and LAE:	<u>3,773,016</u>	<u>4,112,982</u>	<u>3,874,574</u>	<u>4,333,977</u>	<u>2,452,097</u>
d. Ending reserves:	<u>\$ 14,006,955</u>	<u>\$ 13,724,833</u>	<u>\$ 13,235,355</u>	<u>\$ 13,296,098</u>	<u>\$ 14,757,141</u>

NOTES TO FINANCIAL STATEMENTS

2. <u>Assumed Reinsurance Basis- Environmental:</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
a. Beginning reserves:	\$ 2,548,780	\$ 2,770,788	\$ 3,335,770	\$ 3,102,142	\$ 2,985,236
b. Incurred losses and LAE:	677,600	960,740	75,504	154,880	7,260
c. Calendar year payments for losses and LAE:	<u>455,592</u>	<u>395,758</u>	<u>309,132</u>	<u>271,786</u>	<u>245,759</u>
d. Ending reserves:	<u>\$ 2,770,788</u>	<u>\$ 3,335,770</u>	<u>\$ 3,102,142</u>	<u>\$ 2,985,236</u>	<u>\$ 2,746,737</u>

3. <u>Net of Ceded Reinsurance Basis- Environmental:</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
a. Beginning reserves:	\$ 16,965,313	\$ 16,521,191	\$ 16,815,881	\$ 15,926,404	\$ 16,066,420
b. Incurred losses and LAE:	3,678,400	4,356,000	3,131,480	4,210,800	3,484,800
c. Calendar year payments for losses and LAE:	<u>4,122,522</u>	<u>4,061,310</u>	<u>4,020,957</u>	<u>4,070,784</u>	<u>2,650,835</u>
d. Ending reserves:	<u>\$ 16,521,191</u>	<u>\$ 16,815,881</u>	<u>\$ 15,926,404</u>	<u>\$ 16,066,420</u>	<u>\$ 16,900,385</u>

E. Ending loss and LAE reserves for unreported claims included in Part D above:

1. Direct Basis:	\$ 14,603,754
2. Assumed Reinsurance Basis:	\$ 1,732,155
3. Net of Ceded Reinsurance Basis	\$ 15,861,901

F. Ending LAE reserves for reported and unreported claims included in Part D above:

1. Direct Basis:	\$ 4,760,684
2. Assumed Reinsurance Basis:	\$ (392)
3. Net of Ceded Reinsurance Basis	\$ 4,615,010

G. As a result of the processes and procedures discussed above, management believes that the reserves carried for asbestos and environmental claims are appropriately established based upon known facts, current law and management's judgment. However, the uncertainties surrounding the final resolution of these claims continue, and it is difficult to determine the ultimate exposure for asbestos and environmental claims and related litigation. As a result, these reserves are subject to revision as new information becomes available and as claims develop. The continuing uncertainties include, without limitation, the risks and lack of predictability inherent in complex litigation, any impact from the bankruptcy protection sought by various asbestos producers and other asbestos defendants, a further increase or decrease in the cost to resolve, and/or the number of, asbestos and environmental claims beyond that which is anticipated, the emergence of a greater number of asbestos claims than anticipated as a result of extended life expectancies resulting from medical advances and lifestyle improvements, the role of any umbrella or excess policies the Company has issued, the resolution or adjudication of disputes pertaining to the amount of available coverage for asbestos and environmental claims in a manner inconsistent with the Company's previous assessment of these claims, the number and outcome of direct actions against the Company, future developments pertaining to the Company's ability to recover reinsurance for asbestos and environmental claims and the unavailability of other insurance sources potentially available to policyholders, whether through exhaustion of policy limits or through the insolvency of other participating insurers. In addition, uncertainties arise from the insolvency or bankruptcy of policyholders and other defendants. It is also not possible to predict changes in the legal, regulatory and legislative environment and their impact on the future development of asbestos and environmental claims. This environment could be affected by changes in applicable legislation and future court and regulatory decisions and interpretations, including the outcome of legal challenges to legislative and/or judicial reforms establishing medical criteria for the pursuit of asbestos claims. It is also difficult to predict the ultimate outcome of complex coverage disputes until settlement negotiations near completion and significant legal questions are resolved or, failing settlement, until the dispute is adjudicated. This is particularly the case with policyholders in bankruptcy where negotiations often involve a large number of claimants and other parties and require court approval to be effective. As part of its continuing analysis of asbestos and environmental reserves, the Company continues to study the implications of these and other developments.

Because of the uncertainties set forth above, additional liabilities may arise for amounts in excess of the Company's current reserves. In addition, the Company's estimate of claims and claim adjustment expenses may change. These additional liabilities or increases in estimates, or a range of either, cannot now be reasonably estimated and could result in income statement charges that could be material to the Company's operating results in future periods

34. SUBSCRIBER SAVINGS ACCOUNTS

Not applicable.

35. MULTIPLE PERIL CROP INSURANCE

Not applicable.

36. FINANCIAL GUARANTY INSURANCE

Not applicable.

NOTES TO FINANCIAL STATEMENTS

Attachment to the 2015 Annual Statement – Notes to Financial Statements, Note 9 – Part F:
Names of the companies included with TRV in the December 31, 2015, consolidated Federal income tax return filing

The Travelers Companies, Inc. (TRV) & Subsidiaries

<u>Company Name</u>	<u>FEIN</u>	<u>Company Name</u>	<u>FEIN</u>
AMERICAN EQUITY INSURANCE COMPANY	86-0703220	THE PREMIER INSURANCE COMPANY OF MASSACHUSETTS	04-3175569
AMERICAN EQUITY SPECIALTY INSURANCE COMPANY	86-0868106	THE STANDARD FIRE INSURANCE COMPANY	06-6033509
BMR SPORTS PROPERTIES, INC.	52-1852190	THE TRAVELERS CASUALTY COMPANY	41-1435765
CAMPERDOWN CORPORATION	41-1762781	THE TRAVELERS HOME AND MARINE INSURANCE COMPANY	35-1838079
CASTLE PINES FIDELITY REALTY, INC.	52-1735211	THE TRAVELERS INDEMNITY COMPANY	06-0566050
COMMERCIAL GUARANTY INSURANCE COMPANY	75-1679830	THE TRAVELERS INDEMNITY COMPANY OF AMERICA	58-6020487
CONSTITUTION PLAZA, INC.	06-0566030	THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT	06-0336212
DISCOVER PROPERTY & CASUALTY INSURANCE COMPANY	36-2999370	THE TRAVELERS LLOYDS INSURANCE COMPANY	76-0002592
DISCOVER SPECIALTY INSURANCE COMPANY	52-1925132	TINDY FOREIGN, INC.	20-4403403
ENGLISH TURN FIDELITY REALTY, INC.	52-1466734	TPC INVESTMENTS, INC.	06-1534005
ENGLISH TURN REALTY MANAGEMENT, INC.	52-1715225	TRAVCO INSURANCE COMPANY	35-1838077
FARMINGTON CASUALTY COMPANY	06-1067463	TRAVELERS (BERMUDA) LTD	98-0190863
FIDELITY AND GUARANTY INSURANCE COMPANY	42-1091525	TRAVELERS CASUALTY AND SURETY COMPANY	06-6033504
FIDELITY AND GUARANTY INSURANCE UNDERWRITERS, INC.	52-0616768	TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA	06-0907370
FIRST FLORIDIAN AUTO AND HOME INSURANCE COMPANY	59-3372141	TRAVELERS CASUALTY COMPANY OF CONNECTICUT	06-1286266
GULF UNDERWRITERS INSURANCE COMPANY	56-1371361	TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA	06-0876835
JUPITER HOLDINGS, INC.	41-1769846	TRAVELERS COMMERCIAL CASUALTY COMPANY	95-3634110
LAUREL VILLAGE FIDELITY REALTY, INC.	52-1551225	TRAVELERS COMMERCIAL INSURANCE COMPANY	06-1286268
NORTHBROOK HOLDINGS, INC.	51-0375653	TRAVELERS CONSTITUTION STATE INSURANCE COMPANY	41-1435766
NORTHFIELD INSURANCE COMPANY	41-0983992	TRAVELERS DISTRIBUTION ALLIANCE, INC.	62-1657094
NORTHLAND CASUALTY COMPANY	94-6051964	TRAVELERS EXCESS AND SURPLUS LINES COMPANY	06-1203698
NORTHLAND INSURANCE COMPANY	41-6009967	TRAVELERS GLOBAL, INC.	47-2215437
SELECT INSURANCE COMPANY	75-6013697	TRAVELERS INSURANCE GROUP HOLDINGS INC.	06-1445591
SPC INSURANCE AGENCY, INC.	41-1888760	TRAVELERS LLOYDS MANAGEMENT COMPANY	20-4312440
ST. PAUL FIRE AND CASUALTY INSURANCE COMPANY	41-1419276	TRAVELERS LLOYDS OF TEXAS INSURANCE COMPANY	75-1732040
ST. PAUL FIRE AND MARINE INSURANCE COMPANY	41-0406690	TRAVELERS MGA, INC.	75-2676034
ST. PAUL GUARDIAN INSURANCE COMPANY	41-0963301	TRAVELERS PERSONAL INSURANCE COMPANY	36-3703200
ST. PAUL LONDON PROPERTIES, INC.	41-1880024	TRAVELERS PERSONAL SECURITY INSURANCE COMPANY	06-1286264
ST. PAUL MERCURY INSURANCE COMPANY	41-0881659	TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA	36-2719165
ST. PAUL PROTECTIVE INSURANCE COMPANY	36-2542404	TRAVELERS PROPERTY CASUALTY CORP.	06-1008174
ST. PAUL SURPLUS LINES INSURANCE COMPANY	41-1230819	TRAVELERS PROPERTY CASUALTY INSURANCE COMPANY	06-1286274
TCI GLOBAL SERVICES, INC.	52-1965525	TRAVELERS TEXAS MGA, INC.	27-4469564
THE AUTOMOBILE INSURANCE COMPANY OF HARTFORD, CONNECTICUT	06-0848755	UNITED STATES FIDELITY AND GUARANTY COMPANY	52-0515280
THE CHARTER OAK FIRE INSURANCE COMPANY	06-0291290	USF&G RETAIL ASSOCIATES GP, INC.	52-1704255
THE PHOENIX INSURANCE COMPANY	06-0303275	YONKERS FINANCING CORPORATION	20-3033027

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

- 1.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes No
 If yes, complete Schedule Y, Parts 1, 1A and 2.
- 1.2 If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations? Yes No N/A
- 1.3 State regulating? Connecticut
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes No
- 2.2 If yes, date of change: _____
- 3.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2014
- 3.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released. 12/31/2009
- 3.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). 03/14/2011
- 3.4 By what department or departments?
Connecticut
- 3.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with departments? Yes No N/A
- 3.6 Have all of the recommendations within the latest financial examination report been complied with? Yes No N/A
- 4.1 During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity) receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
- 4.11 sales of new business? Yes No
- 4.12 renewals? Yes No
- 4.2 During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
- 4.21 sales of new business? Yes No
- 4.22 renewals? Yes No
- 5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes No
- 5.2 If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.
- | 1
Name of Entity | 2
NAIC
Company
Code | 3
State of
Domicile |
|---------------------|------------------------------|---------------------------|
| | 0 | |
- 6.1 Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? Yes No
- 6.2 If yes, give full information:
- 7.1 Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity? Yes No
- 7.2 If yes,
- 7.21 State the percentage of foreign control 0.000%
- 7.22 State the nationality(ies) of the foreign person(s) or entity(ies); or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact and identify the type of entity(ies) (e.g., individual, corporation, government, manager or attorney-in-fact).
- | 1
Nationality | 2
Type of Entity |
|------------------|---------------------|
| | |
- 8.1 Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board? Yes No
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.
- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes No
- 8.4 If the response to 8.3 is yes, please provide below the names and locations (city and state of the main office) of any affiliates regulated by a federal financial regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.
- | 1
Affiliate Name | 2
Location (City, State) | 3
FRB | 4
OCC | 5
FDIC | 6
SEC |
|---------------------|-----------------------------|----------|----------|-----------|----------|
| | | | | | |
9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?
KPMG LLP, One Financial Plaza, 755 Main St., Hartford, CT 06103
- 10.1 Has the insurer been granted an exemptions to the prohibited non-audit services provided by the certified independent public account requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation? Yes No
- 10.2 If the response to 10.1 is yes, provide information related to this exemption:
- 10.3 Has the insurer been granted any exemptions related to other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 18A of the Model Regulation, or substantially similar state law or regulation? Yes No
- 10.4 If the response to 10.3 is yes, provide information related to this exemption:
- 10.5 Has the reporting entity established an Audit Committee in complied with the domiciliary state insurance laws? Yes No N/A
- 10.6 If the response to 10.5 is no or n/a, please explain:

GENERAL INTERROGATORIES**PART 1 - COMMON INTERROGATORIES**

11. What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?
Renée H. Davis, FCAS, MAAA (Vice President and Chief Corporate Actuary), The Travelers Companies, Inc., One Tower Square, Hartford, CT 06183
- 12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? Yes No
- 12.11 Name of real estate holding company Standard Fire Properties, LLC, Oregon Evergreen Investor I, LLC
- 12.12 Number of parcels involved 64
- 12.13 Total book/adjusted carrying value \$ 48,384,969
- 12.2 If yes, provide explanation
Standard Fire Properties, LLC - Holds ground leases. Oregon Evergreen Investor I, LLC - Owns 75% of Lone Rock Timber I LLC and 90% of Lone Rock Timber II LLC, which owns timber land.
13. **FOR UNITED STATES BRANCES OF ALIEN REPORTING ENTITIES ONLY:**
- 13.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?
- 13.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? Yes No
- 13.3 Have there been any changes made to any of the trust indentures during the year? Yes No
- 13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? Yes No N/A
- 14.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? Yes No
- (a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
- (c) Compliance with applicable governmental laws, rules and regulations;
- (d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
- (e) Accountability for adherence to the code.
- 14.11 If the response to 14.1 is no, please explain:
- 14.2 Has the code of ethics for senior managers been amended? Yes No
- 14.21 If the response to 14.2 is yes, provide information related to amendment(s).
- 14.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes No
- 14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).
- 15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance where the issuing or confirming bank is not on the SVO Bank List? Yes No
- 15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount
0			0

BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the Board of Directors or a subordinator committee thereof? Yes No
17. Does the reporting entity keep a complete permanent record of the proceedings of its Board of Directors an all subordinator committees thereof? Yes No
18. Has the reporting entity an established procedure for disclosure to its Board of Directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict or is likely to conflict with the official duties of such person? Yes No

FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? Yes No
- 20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):
- 20.11 To directors or other officers \$ 0
- 20.12 To stockholders not officers \$ 0
- 20.13 Trustees, supreme or grand (Fraternal only) \$ 0
- 20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):
- 20.21 To directors or other officers \$ 0
- 20.22 To stockholders not officers \$ 0
- 20.23 Trustees, supreme or grand (Fraternal only) \$ 0
- 21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reporting in the statement? Yes No
- 21.2 If yes, state the amount thereof at December 31 of the current year:
- 21.21 Rented from others \$ 0
- 21.22 Borrowed from others \$ 0
- 21.23 Leased from others \$ 0
- 21.24 Other \$ 0
- 22.1 Does this statement include payments for assessments as described in the *Annual Statement Instructions* other than guaranty fund or guaranty association assessments? Yes No
- 22.2 If answer is yes:
- 22.21 Amount paid as losses or risk adjustment \$ 0
- 22.22 Amount paid as expenses \$ 0
- 22.23 Other amounts paid \$ 0
- 23.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes No
- 23.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ 0

INVESTMENT

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

- 24.01 Were all of the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date (other than securities lending programs addressed in 24.03)? Yes No
- 24.02 If no, give full and complete information, relating thereto:
- 24.03 For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off balance sheet (an alternative is to reference Note 17 where this information is also provided).
This company is a party to a security lending agreement. See Note 17.
- 24.04 Does the company's security lending program meet the requirements for a conforming program as outlined in the *Risk-Based Capital Instructions*? Yes No N/A
- 24.05 If answer to 24.04 is yes, report amount of collateral for conforming programs. \$ 0
- 24.06 If answer to 24.04 is no, report amount of collateral for other programs. \$ 0
- 24.07 Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract? Yes No N/A
- 24.08 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? Yes No N/A
- 24.09 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities Lending Agreement (MSLA) to conduct securities lending? Yes No N/A
- 24.10 For the reporting entity's security lending program, state the amount of the following as of December 31 of the current year:
- 24.101 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0
- 24.102 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0
- 24.103 Total payable for securities lending reported on the liability page: \$ 0
- 25.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity or has the reporting entity sold or transferred any assets subject to a put option contract that is current in force? (Exclude securities subject to Interrogatory 21.1 and 24.03.) Yes No
- 25.2 If yes, state the amount thereof at December of the current year:
- 25.21 Subject to repurchase agreements \$ 0
- 25.22 Subject to reverse repurchase agreements \$ 0
- 25.23 Subject to dollar repurchase agreements \$ 0
- 25.24 Subject to reverse dollar repurchase agreements \$ 0
- 25.25 Placed under option agreements \$ 0
- 25.26 Letter stock or securities restricted as sale – excluding FHLB Capital Stock \$ 0
- 25.27 FHLB Capital Stock \$ 0
- 25.28 On deposit with states \$ 168,533,911
- 25.29 On deposit with other regulatory bodies \$ 6,957,337
- 25.30 Pledged as collateral – excluding collateral pledged to an FHLB \$ 0
- 25.31 Pledged as collateral to FHLB – including assets backing funding agreements \$ 0
- 25.32 Other \$ 0
- 25.3 For category (25.26) provide the following:
- | 1
Nature of Restriction | 2
Description | 3
Amount |
|----------------------------|------------------|-------------|
| | | \$ <u>0</u> |
- 26.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes No
- 26.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes No N/A
If no, attach a description with this statement.
- 27.1 Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into equity, or, at the option of the issuer, convertible into equity? Yes No
- 27.2 If yes, state the amount thereof at December of the current year: \$ 0
28. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*? Yes No
- 28.01 For all agreements that comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, complete the following:
- | 1
Name of Custodian(s) | 2
Custodian Address |
|---------------------------|--|
| JPMorgan Chase | 270 Park Avenue, New York, NY 10017-2070 |
- 28.02 For all agreements that do not comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, provide the name, location and a complete explanation
- | 1
Name(s) | 2
Location(s) | 3
Complete Explanation(s) |
|--------------|------------------|------------------------------|
| N/A | | |
- 28.03 Have there been any changes, including name changes, in the custodian(s) identified in 28.01 during the current year? Yes No
- 28.04 If yes, give full and complete information relating thereto:
- | 1
Old Custodian | 2
New Custodian | 3
Date of Change | 4
Reason |
|--------------------|--------------------|---------------------|-------------|
| | | | |
- 28.05 Identify all investment advisors, broker/dealers or individuals acting on behalf of broker/dealers that have access to the investment accounts, handle securities and have authority to make investments on behalf of the reporting entity:
- | 1
Central Registration Depository | 2
Name(s) | 3
Address |
|--------------------------------------|--------------|--------------|
| N/A | | |
- 29.1 Does the reporting entity have any diversified mutual funds reported in Schedule D-Part 2 (diversified according to the Securities and Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5 (b) (1)])? Yes No
- 29.2 If yes, complete the following schedule:

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

1 CUSIP	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
		0
29.2999 TOTAL		0

29.3 For each mutual fund listed in the table above, complete the following schedule:

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holdings	4 Date of Valuation
		0	

30. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

		1 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
30.1	Bonds	2,219,885,859	2,284,605,308	64,719,449
30.2	Preferred Stocks	0	0	0
30.3	Totals	2,219,885,859	2,284,605,308	64,719,449

30.4 Describe the sources or methods utilized in determining fair values:

Fair values of bonds are based on prices published in the NAIC Valuations of Securities. If this unit price is not available, the fair value is based upon quoted market prices or dealer quotes, or if prices are unavailable, based on valuation determined, in good faith, by The Travelers Companies, Inc.

31.1 Was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Schedule D? Yes [X] No []

31.2 If the answer to 31.1 is yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic copy) for all brokers or custodians used as a pricing source? Yes [X] No []

31.3 If the answer to 31.2 is no, describe the reporting entity's process for determining a reliance pricing source for purposes of disclosure of fair value for Schedule D:

32.1 Have all the filing requirements of the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* been followed? Yes [X] No []

32.2 If no, list exceptions:

OTHER

33.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any? \$ 2,457,532

33.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
INSURANCE SERVICES OFFICE, INC	\$ 1,114,498

34.1 Amount of payments for legal expenses, if any? \$ 3,987,583

34.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
	\$ 0

35.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? \$ 78,020

35.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
	\$ 0

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

1.1	Does the reporting entity have any direct Medicare Supplement Insurance in force?			Yes []	No [X]
1.2	If yes, indicate premium earned on U.S. business only.		\$		0
1.3	What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit?		\$		0
1.31	Reason for excluding:				
1.4	Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above.		\$		0
1.5	Indicate total incurred claims on all Medicare Supplement insurance.		\$		0
1.6	Individual policies:				
	Most current three years:				
1.61	Total premium earned		\$		0
1.62	Total incurred claims		\$		0
1.63	Number of covered lives				0
	All years prior to most current three years:				
1.64	Total premium earned		\$		0
1.65	Total incurred claims		\$		0
1.66	Number of covered lives				0
1.7	Group policies:				
	Most current three years:				
1.71	Total premium earned		\$		0
1.72	Total incurred claims		\$		0
1.73	Number of covered lives				0
	All years prior to most current three years:				
1.74	Total premium earned		\$		0
1.75	Total incurred claims		\$		0
1.76	Number of covered lives				0
2.	Health Test:				
		1	2		
		Current Year	Prior Year		
2.1	Premium Numerator	\$	\$	0	0
2.2	Premium Denominator	\$	\$	990,111,724	967,054,628
2.3	Premium Ratio (2.1/2.2)			0.000	0.000
2.4	Reserve Numerator	\$	\$	0	0
2.5	Reserve Denominator	\$	\$	2,239,162,670	2,252,281,696
2.6	Reserve Ratio (2.4/2.5)			0.000	0.000
3.1	Does the reporting entity issue both participating and non-participating policies?			Yes [X]	No []
3.2	If yes, state the amount of calendar year premiums written on:				
3.21	Participating policies		\$		16,498,394
3.22	Non-participating policies		\$		989,227,306
4.	FOR MUTUAL REPORTING ENTITIES AND RECIPROCAL EXCHANGES ONLY:				
4.1	Does the reporting entity issue assessable policies?			Yes []	No []
4.2	Does the reporting entity issue non-assessable policies?			Yes []	No []
4.3	If assessable policies are issued, what is the extent of the contingent liability of the policyholders?				0.000%
4.4	Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums.		\$		0
5.	FOR RECIPROCAL EXCHANGES ONLY:				
5.1	Does the exchange appoint local agents?			Yes []	No []
5.2	If yes, is the commission paid:				
5.21	Out of Attorney's-in-fact compensation			Yes []	No []
5.22	As a direct expense of the exchange			Yes []	No []
5.3	What expenses of the exchange are not paid out of the compensation of the Attorney-in-fact?				
5.4	Has any Attorney-in-fact compensation, contingent on fulfillments of certain conditions, been deferred?			Yes []	No []
5.5	If yes, give full information:				
6.1	What provision has this reporting entity made to protect itself from an excessive loss in the event of a catastrophe under a workers' compensation contract issued without limit of loss? <u>The Company's risk management practices include active monitoring of insured employee local-based concentrations. Although the Company currently has no significant workers' compensation treaty reinsurance, the Company reviews available treaty reinsurance coverages periodically and makes purchase decisions as it deems appropriate. Facultative reinsurance purchases are also made as deemed appropriate.</u>				
6.2	Describe the method used to estimate this reporting entity's probable maximum insurance loss, and identify the type of insured exposures comprising that probable maximum loss, the locations of concentrations of those exposures and the external resources (such as consulting firms or computer software models), if any, used in the estimation process: <u>The Company uses various analyses and methods, including proprietary and third party computer modeling processes, to analyze catastrophic events and the associated risks to arrive at loss estimates. The Company uses these analyses and methods to make underwriting and reinsurance decisions designed to manage its exposure to catastrophic events. The Company's hurricane loss estimates for U.S. exposures include property exposures, property residual market exposures and an adjustment for certain non-property exposures. The Company's loss estimates are based on the Company's catastrophe risk model estimates and include loss from the hurricane hazards of wind and storm surge. The Company's loss estimates for earthquakes reflect U.S. exposures and include property exposures and workers' compensation exposures. The Company's loss estimates for terrorism reflect U.S. exposures and include property exposures. The Company also develops conventional attack loss estimates for combined property and workers' compensation exposures for comparison and adherence with aggregate enterprise guidelines. To best assess risk, the Company conducts site engineering analyses on buildings with large exposures. Property exposures are analyzed to determine locations of concentration. Spanning the U.S., this includes California, Florida, New Madrid, the Northeast, the Gulf States and the Mid-Atlantic States.</u>				
6.3	What provision has this reporting entity made (such as catastrophic reinsurance program) to protect itself from an excessive loss arising from the types and concentrations of insured exposures comprising its probable maximum property insurance loss? <u>The Company purchases both excess of loss and proportional reinsurance to protect itself from an excessive catastrophe loss.</u>				

GENERAL INTERROGATORIES

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

6.4	Does the reporting entity carry catastrophe reinsurance protection for at least one reinstatement, in an amount sufficient to cover its estimated probable maximum loss attributable to a single loss event or occurrence?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
6.5	If no, describe any arrangements or mechanisms employed by the reporting entity to supplement its catastrophe reinsurance program or to hedge its exposure to unreinsured catastrophic loss: <u>The Company's all region aggregate catastrophe treaty does not contain a reinstatement provision but does allow for recoveries under multiple event loss scenarios. The Company's northeast region catastrophe treaty applies per occurrence and provides for one reinstatement. Additionally, the Company buys property catastrophe cat bonds for designated perils covering the northeast region. Those bonds apply per occurrence but do not have a reinstatement provision. The Company believes that its reinsurance programs along with the Company's surplus is adequate to cover its exposures in a catastrophic event.</u>		
7.1	Has the reporting entity reinsured any risk with any other entity under a quota share reinsurance contract that includes a provision that would limit the reinsurer's losses below the stated quota share percentage (e.g., a deductible, a loss ratio corridor, a loss cap, an aggregate limit or any similar provisions)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7.2	If yes, indicate the number of reinsurance contracts containing such provisions.	12	
7.3	If yes, does the amount of reinsurance credit taken reflect the reduction in quota share coverage caused by any applicable limiting provision(s)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
8.1	Has this reporting entity reinsured any risk with any other entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on this risk, or portion thereof, reinsured?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
8.2	If yes, give full information		
9.1	Has the reporting entity ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates) for which during the period covered by the statement: (i) it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; (ii) it accounted for that contract as reinsurance and not as a deposit; and (iii) the contract(s) contain one or more of the following features or other features that would have similar results: (a) A contract term longer than two years and the contract is noncancellable by the reporting entity during the contract term; (b) A limited or conditional cancellation provision under which cancellation triggers an obligation by the reporting entity, or an affiliate of the reporting entity, to enter into a new reinsurance contract with the reinsurer, or an affiliate of the reinsurer; (c) Aggregate stop loss reinsurance coverage; (d) A unilateral right by either party (or both parties) to commute the reinsurance contract, whether conditional or not, except for such provisions which are only triggered by a decline in the credit status of the other party; (e) A provision permitting reporting of losses, or payment of losses, less frequently than on a quarterly basis (unless there is no activity during the period); or (f) Payment schedule, accumulating retentions from multiple years or any features inherently designed to delay timing of the reimbursement to the ceding entity?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
9.2	Has the reporting entity during the period covered by the statement ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates), for which, during the period covered by the statement, it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; excluding cessions to approved pooling arrangements or to captive insurance companies that are directly or indirectly controlling, controlled by, or under common control with (i) one or more unaffiliated policyholders of the reporting entity, or (ii) an association of which one or more unaffiliated policyholders of the reporting entity is a member where: (a) The written premium ceded to the reinsurer by the reporting entity or its affiliates represents fifty percent (50%) or more of the entire direct and assumed premium written by the reinsurer based on its most recently available financial statement; or (b) Twenty-five percent (25%) or more of the written premium ceded to the reinsurer has been retroceded back to the reporting entity or its affiliates in a separate reinsurance contract.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
9.3	If yes to 9.1 or 9.2, please provide the following information in the Reinsurance Summary Supplemental Filing for General Interrogatory 9: (a) The aggregate financial statement impact gross of all such ceded reinsurance contracts on the balance sheet and statement of income; (b) A summary of the reinsurance contract terms and indicate whether it applies to the contracts meeting the criteria in 9.1 or 9.2; and (c) A brief discussion of management's principle objectives in entering into the reinsurance contract including the economic purpose to be achieved.		
9.4	Except for transactions meeting the requirements of paragraph 31 of SSAP No. 62R, Property and Casualty Reinsurance, has the reporting entity ceded any risk under any reinsurance contract (or multiple contracts with the same reinsurer or its affiliates) during the period covered by the financial statement, and either: (a) Accounted for that contract as reinsurance (either prospective or retroactive) under statutory accounting principles ("SAP") and as a deposit under generally accepted accounting principles ("GAAP"); or (b) Accounted for that contract as reinsurance under GAAP and as a deposit under SAP?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
9.5	If yes to 9.4, explain in the Reinsurance Summary Supplemental Filing for General Interrogatory 9 (Section D) why the contract(s) is treated differently for GAAP and SAP.		
9.6	The reporting entity is exempt from the Reinsurance Attestation Supplement under one or more of the following criteria: (a) The entity does not utilize reinsurance; or, (b) The entity only engages in a 100% quota share contract with an affiliate and the affiliated or lead company has filed an attestation supplement; or (c) The entity has no external cessions and only participates in an intercompany pool and the affiliated or lead company has filed an attestation supplement.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
10.	If the reporting entity has assumed risks from another entity, there should be charged on account of such reinsurances a reserve equal to that which the original entity would have been required to charge had it retained the risks. Has this been done?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11.1	Has the reporting entity guaranteed policies issued by any other entity and now in force?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
11.2	If yes, give full information		
12.1	If the reporting entity recorded accrued retrospective premiums on insurance contracts on Line 15.3 of the assets schedule, Page 2, state the amount of corresponding liabilities recorded for:		
	12.11 Unpaid losses	\$	3,089,711
	12.12 Unpaid underwriting expenses (including loss adjustment expenses)	\$	545,243
12.2	Of the amount on Line 15.3, Page 2, state the amount that is secured by letters of credit, collateral and other funds?	\$	4,680,075
12.3	If the reporting entity underwrites commercial insurance risks, such as workers' compensation, are premium notes or promissory notes accepted from its insureds covering unpaid premiums and/or unpaid losses?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
12.4	If yes, provide the range of interest rates charged under such notes during the period covered by this statement:		
	12.41 From		0.000%
	12.42 To		0.000%

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

12.5	Are letters of credit or collateral and other funds received from insureds being utilized by the reporting entity to secure premium notes or promissory notes taken by a reporting entity, or to secure any of the reporting entity's reported direct unpaid loss reserves, including unpaid losses under loss deductible features of commercial policies?									Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
12.6	If yes, state the amount thereof at December 31 of current year:									
12.61	Letters of Credit	\$							292,391,494	
12.62	Collateral and other funds	\$							89,544,949	
13.1	Largest net aggregate amount insured in any one risk (excluding workers' compensation):	\$							2,336,916	
13.2	Does any reinsurance contract considered in the calculation of this amount include an aggregate limit of recovery without also including a reinstatement provision?									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
13.3	State the number of reinsurance contracts (excluding individual facultative risk certificates, but including facultative programs, automatic facilities or facultative obligatory contracts) considered in the calculation of the amount.								3	
14.1	Is the company a cedant in a multiple cedant reinsurance contract?									Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
14.2	If yes, please describe the method of allocating and recording reinsurance among the cedants: <u>Per the Company's Reinsurance Allocation Agreement and Pooling Agreement.</u>									
14.3	If the answer to 14.1 is yes, are the methods described in item 14.2 entirely contained in the respective multiple cedant reinsurance contracts?									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
14.4	If the answer to 14.3 is no, are all the methods described in 14.2 entirely contained in written agreements?									Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
14.5	If the answer to 14.4 is no, please explain:									
15.1	Has the reporting entity guaranteed any financed premium accounts?									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
15.2	If yes, give full information									
16.1	Does the reporting entity write any warranty business?									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	If yes, disclose the following information for each of the following types of warranty coverage:									
			1	2	3	4	5			
			Direct Losses	Direct Losses	Direct Written	Direct Premium	Direct Premium			
			Incurred	Unpaid	Premium	Unearned	Earned			
16.11	Home	\$	0 \$	0 \$	0 \$	0 \$	0		0	
16.12	Products	\$	0 \$	0 \$	0 \$	0 \$	0		0	
16.13	Automobile	\$	0 \$	0 \$	0 \$	0 \$	0		0	
16.14	Other*	\$	0 \$	0 \$	0 \$	0 \$	0		0	
	* Disclose type of coverage:									
17.1	Does the reporting entity include amounts recoverable on unauthorized reinsurance in Schedule F – Part 3 that it excludes from Schedule F – Part 5. Incurred but not reported losses on contracts in force prior to July 1, 1984, and not subsequently renewed are exempt from inclusion in Schedule F – Part 5. Provide the following information for this exemption:									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
17.11	Gross amount of unauthorized reinsurance in Schedule F – Part 3 excluded from Schedule F – Part 5	\$							0	
17.12	Unfunded portion of Interrogatory 17.11	\$							0	
17.13	Paid losses and loss adjustment expenses portion of Interrogatory 17.11	\$							0	
17.14	Case reserves portion of Interrogatory 17.11	\$							0	
17.15	Incurred but not reported portion of Interrogatory 17.11	\$							0	
17.16	Unearned premium portion of Interrogatory 17.11	\$							0	
17.17	Contingent commission portion of Interrogatory 17.11	\$							0	
	Provide the following information for all other amounts included in Schedule F – Part 3 and excluded from Schedule F – Part 5, not included above.									
17.18	Gross amount of unauthorized reinsurance in Schedule F – Part 3 excluded from Schedule F – Part 5	\$							0	
17.19	Unfunded portion of Interrogatory 17.18	\$							0	
17.20	Paid losses and loss adjustment expenses portion of Interrogatory 17.18	\$							0	
17.21	Case reserves portion of Interrogatory 17.18	\$							0	
17.22	Incurred but not reported portion of Interrogatory 17.18	\$							0	
17.23	Unearned premium portion of Interrogatory 17.18	\$							0	
17.24	Contingent commission portion of Interrogatory 17.18	\$							0	
18.1	Do you act as a custodian for health savings accounts?									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
18.2	If yes, please provide the amount of custodial funds held as of the reporting date.	\$							0	
18.3	Do you act as an administrator for health savings accounts?									Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
18.4	If yes, please provide the balance of the funds administered as of the reporting date.	\$							0	

FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e. 17.6.

	1 2015	2 2014	3 2013	4 2012	5 2011
Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 & 3)					
1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	1,438,334,475	1,103,810,848	899,345,772	947,523,776	960,031,358
2. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	734,662,264	550,072,988	644,290,175	681,514,991	682,257,197
3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	797,556,436	855,242,132	896,713,991	945,914,871	973,384,642
4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	3,291,118	1,582,951	3,276,323	3,769,152	4,576,976
5. Nonproportional reinsurance lines (Lines 31, 32 & 33).....	2,693,750	3,014,251	2,797,600	2,558,324	2,375,305
6. Total (Line 35).....	2,976,538,043	2,513,723,170	2,446,423,861	2,581,281,114	2,622,625,477
Net Premiums Written (Page 8, Part 1B, Col. 6)					
7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	494,490,394	474,568,411	467,749,200	450,004,159	430,989,242
8. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	175,212,704	168,769,081	166,847,054	160,531,839	160,827,913
9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	330,038,474	329,237,588	334,082,825	329,853,886	328,128,452
10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	3,290,378	1,581,961	3,275,583	3,768,762	4,575,236
11. Nonproportional reinsurance lines (Lines 31, 32 & 33).....	2,693,750	3,014,251	2,797,600	2,558,324	2,375,305
12. Total (Line 35).....	1,005,725,700	977,171,291	974,752,262	946,716,970	926,896,147
Statement of Income (Page 4)					
13. Net underwriting gain (loss) (Line 8).....	103,564,436	88,368,999	82,204,099	934,015	(79,104,325)
14. Net investment gain (loss) (Line 11).....	162,946,796	180,239,877	150,396,706	143,152,532	168,983,524
15. Total other income (Line 15).....	414,685	17,821,528	38,808,657	8,770,343	(519,727)
16. Dividends to policyholders (Line 17).....	1,664,146	1,522,935	1,408,449	1,947,733	1,686,690
17. Federal and foreign income taxes incurred (Line 19).....	60,416,460	56,751,989	52,132,050	20,210,770	(6,959,019)
18. Net income (Line 20).....	204,845,311	228,155,481	217,868,963	130,698,386	94,631,801
Balance Sheet Lines (Pages 2 and 3)					
19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3).....	3,583,924,589	3,627,132,137	3,605,293,999	3,440,165,126	3,374,009,131
20. Premiums and considerations (Page 2, Col. 3):					
20.1 In course of collection (Line 15.1).....	59,520,658	57,426,329	53,720,056	50,406,074	46,137,220
20.2 Deferred and not yet due (Line 15.2).....	207,465,245	199,299,615	193,577,206	193,030,546	183,955,000
20.3 Accrued retrospective premiums (Line 15.3).....	3,872,190	4,059,088	4,605,388	5,528,460	9,011,034
21. Total liabilities excluding protected cell business (Page 3, Line 26).....	2,398,381,180	2,411,960,075	2,370,513,049	2,382,408,789	2,364,142,888
22. Losses (Page 3, Line 1).....	1,401,881,722	1,412,561,206	1,437,412,417	1,448,840,779	1,440,340,979
23. Loss adjustment expenses (Page 3, Line 3).....	323,055,032	343,946,222	316,384,099	314,961,683	323,211,632
24. Unearned premiums (Page 3, Line 9).....	457,925,236	441,634,042	431,608,160	420,982,192	412,603,803
25. Capital paid up (Page 3, Lines 30 & 31).....	5,000,000	5,000,000	5,000,000	5,000,000	5,000,000
26. Surplus as regards policyholders (Page 3, Line 37).....	1,185,543,409	1,215,172,062	1,234,780,950	1,057,756,337	1,009,866,243
Cash Flow (Page 5)					
27. Net cash from operations (Line 11).....	192,570,187	263,349,016	229,653,409	167,097,218	127,206,375
Risk-Based Capital Analysis					
28. Total adjusted capital.....	1,185,543,409	1,215,172,062	1,234,780,950	1,057,756,337	1,009,866,243
29. Authorized control level risk-based capital.....	215,396,209	215,448,457	207,071,922	214,152,432	210,728,506
Percentage Distribution of Cash, Cash Equivalents and Invested Assets (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0					
30. Bonds (Line 1).....	70.7	71.2	73.5	76.5	76.1
31. Stocks (Lines 2.1 & 2.2).....	17.3	16.7	16.5	16.4	16.1
32. Mortgage loans on real estate (Lines 3.1 & 3.2).....	0.0	0.0	0.0	0.0	0.0
33. Real estate (Lines 4.1, 4.2 & 4.3).....	0.0	0.0	0.0	0.1	0.1
34. Cash, cash equivalents and short-term investments (Line 5).....	1.8	2.7	2.4	0.3	0.6
35. Contract loans (Line 6).....	0.0	0.0	0.0	0.0	0.0
36. Derivatives (Line 7).....	0.0	0.0	0.0	0.0	0.0
37. Other invested assets (Line 8).....	10.3	9.4	7.5	6.5	6.7
38. Receivable for securities (Line 9).....	0.0	0.0	0.0	0.0	0.2
39. Securities lending reinvested collateral assets (Line 10).....	0.0	0.1	0.1	0.2	0.2
40. Aggregate write-ins for invested assets (Line 11).....	0.0	0.0	0.0	0.0	0.0
41. Cash, cash equivalents and invested assets (Line 12).....	100.0	100.0	100.0	100.0	100.0
Investments in Parent, Subsidiaries and Affiliates					
42. Affiliated bonds (Sch. D, Summary, Line 12, Col. 1).....	0	0	0	0	0
43. Affiliated preferred stocks (Sch. D, Summary, Line 18, Col. 1).....	0	0	0	0	0
44. Affiliated common stocks (Sch. D, Summary, Line 24, Col. 1).....	529,289,359	523,463,117	519,080,414	485,962,096	466,811,433
45. Affiliated short-term investments (subtotals included in Schedule DA, Verification, Column 5, Line 10).....	0	0	0	0	0
46. Affiliated mortgage loans on real estate.....	0	0	0	0	0
47. All other affiliated.....	49,239,516	51,100,427	28,974,492	30,058,906	29,276,077
48. Total of above lines 42 to 47.....	578,528,875	574,563,544	548,054,906	516,021,002	496,087,510
49. Total investment in parent included in Lines 42 to 47 above.....	0	0	0	0	0
50. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line 48 above divided by Page 3, Col. 1, Line 37 x 100.0).....	48.8	47.3	44.4	48.8	49.1

FIVE-YEAR HISTORICAL DATA

(Continued)

	1	2	3	4	5
	2015	2014	2013	2012	2011
Capital and Surplus Accounts (Page 4)					
51. Net unrealized capital gains (losses) (Line 24).....	12,304,387	20,573,436	45,620,568	34,777,344	(44,030,754)
52. Dividends to stockholders (Line 35).....	(250,000,000)	(266,800,000)	(81,000,000)	(99,000,000)	(235,000,000)
53. Change in surplus as regards policyholders for the year (Line 38).....	(29,628,653)	(19,608,888)	177,024,613	47,890,094	(182,948,478)
Gross Losses Paid (Page 9, Part 2, Cols. 1 & 2)					
54. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	635,798,394	506,718,670	538,099,695	565,302,753	534,169,662
55. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	422,538,997	322,473,060	1,331,602,615	518,597,321	422,611,522
56. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	332,085,935	342,515,306	439,890,155	550,360,840	760,829,158
57. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	1,921,249	3,143,130	568,879	3,136,294	3,279,307
58. Nonproportional reinsurance lines (Lines 31, 32 & 33).....	3,520,246	5,865,699	3,974,088	1,870,433	3,009,837
59. Total (Line 35).....	1,395,864,821	1,180,715,865	2,314,135,432	1,639,267,642	1,723,899,486
Net Losses Paid (Page 9, Part 2, Col. 4)					
60. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	251,654,515	237,675,702	239,817,049	244,565,773	225,100,190
61. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	83,648,277	84,403,929	84,470,232	94,866,810	101,399,503
62. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	136,093,073	140,785,702	153,115,391	183,794,909	224,791,851
63. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	1,921,249	3,143,130	568,879	3,136,294	3,279,307
64. Nonproportional reinsurance lines (Lines 31, 32 & 33).....	3,520,246	5,865,699	3,974,088	1,870,433	3,009,837
65. Total (Line 35).....	476,837,361	471,874,161	481,945,639	528,234,219	557,580,689
Operating Percentages (Page 4) (Item divided by Page 4, Line 1) x 100.0					
66. Premiums earned (Line 1).....	100.0	100.0	100.0	100.0	100.0
67. Losses incurred (Line 2).....	47.1	46.2	48.9	57.2	64.9
68. Loss expenses incurred (Line 3).....	11.7	14.3	12.0	11.2	12.0
69. Other underwriting expenses incurred (Line 4).....	30.8	30.4	30.6	31.5	31.7
70. Net underwriting gain (loss) (Line 8).....	10.5	9.1	8.5	0.1	(8.6)
Other Percentages					
71. Other underwriting expenses to net premiums written (Page 4, Lines 4 + 5 - 15 divided by Page 8, Part 1B, Col. 6, Line 35 x 100.0).....	30.3	28.2	26.2	30.4	31.5
72. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0).....	58.7	60.5	60.9	68.4	76.9
73. Net premiums written to policyholders' surplus (Page 8, Part 1B, Col. 6, Line 35, divided by Page 3, Line 37, Col. 1 x 100.0).....	84.8	80.4	78.9	89.5	91.8
One Year Loss Development (000 omitted)					
74. Development in estimated losses and loss expenses incurred prior to current year (Schedule P, Part 2-Summary, Line 12, Col. 11).....	(32,097)	(53,783)	(23,598)	(28,150)	(15,347)
75. Percent of development of losses and loss expenses incurred to policyholders' surplus of prior year end (Line 74 above divided by Page 4, Line 21, Col. 1 x 100).....	(2.6)	(4.4)	(2.2)	(2.8)	(1.3)
Two Year Loss Development (000 omitted)					
76. Development in estimated losses and loss expenses incurred 2 years before the current year and prior year (Schedule P, Part 2-Summary, Line 12, Col. 12).....	(77,051)	(73,993)	(52,567)	(50,922)	(79,807)
77. Percent of development of losses and loss expenses incurred to reported policyholders' surplus of second prior year end (Line 76 above divided by Page 4, Line 21, Col. 2 x 100.0).....	(6.2)	(7.0)	(5.2)	(4.3)	(5.8)

If a party to a merger, have the two most recent years of this exhibit been restated due to a merger in compliance with the disclosure requirements of SSAP No. 3, Accounting Changes and Correction of Errors?

Yes [] No []

If no, please explain:

SCHEDULE P - ANALYSIS OF LOSSES AND LOSS EXPENSES

SCHEDULE P - PART 1 - SUMMARY

(\$'000 Omitted)

Years in Which Premiums Were Earned and Losses Were Incurred	Premiums Earned			Loss and Loss Expense Payments							12 Number of Claims Reported-Direct and Assumed	
	1 Direct and Assumed	2 Ceded	3 Net (Cols. 1 - 2)	Loss Payments		Defense and Cost Containment Payments		Adjusting and Other Payments		10 Salvage and Subrogation Received		11 Total Net Paid (Cols. 4 - 5 + 6 - 7 + 8 - 9)
				4 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded			
1. Prior.....	XXX	XXX	XXX	38,605	11,307	13,370	2,779	32,792	1,313	(2,230)	69,369	XXX
2. 2006.....	970,657	119,274	851,383	382,272	48,028	37,351	3,871	39,698	1,208	18,967	406,214	XXX
3. 2007.....	986,494	100,751	885,743	403,268	39,031	39,340	3,008	42,678	935	22,009	442,312	XXX
4. 2008.....	989,915	98,107	891,808	503,016	51,716	42,444	3,146	49,966	735	22,862	539,829	XXX
5. 2009.....	976,462	78,757	897,705	451,160	29,426	39,384	2,214	48,647	564	20,651	506,986	XXX
6. 2010.....	970,225	71,245	898,980	494,817	27,703	42,261	2,011	49,614	452	25,267	556,525	XXX
7. 2011.....	1,005,642	69,411	936,231	595,435	39,445	42,839	2,394	51,734	480	27,042	647,689	XXX
8. 2012.....	1,032,787	76,416	956,371	552,040	87,214	38,563	4,231	53,148	819	25,096	551,487	XXX
9. 2013.....	1,045,014	82,502	962,512	374,676	22,091	27,546	1,095	48,544	1,256	20,292	426,323	XXX
10. 2014.....	1,044,683	77,629	967,055	318,817	19,832	19,243	895	45,079	1,189	17,682	361,222	XXX
11. 2015.....	1,060,722	70,610	990,112	208,689	8,106	7,928	280	38,464	911	10,426	245,785	XXX
12. Totals.....	XXX	XXX	XXX	4,322,796	383,900	350,269	25,924	500,363	9,864	208,063	4,753,741	XXX

	Losses Unpaid				Defense and Cost Containment Unpaid				Adjusting and Other Unpaid		23 Salvage and Subrogation Anticipated	24 Total Net Losses and Expenses Unpaid	25 Number of Claims Outstanding-Direct and Assumed
	Case Basis		Bulk + IBNR		Case Basis		Bulk + IBNR		21 Direct and Assumed	22 Ceded			
	13 Direct and Assumed	14 Ceded	15 Direct and Assumed	16 Ceded	17 Direct and Assumed	18 Ceded	19 Direct and Assumed	20 Ceded					
1. Prior.....	314,787	95,924	241,888	46,976	30,338	4,116	51,149	3,668	32,326	(69)	747	519,874	XXX
2. 2006.....	14,767	3,730	19,174	3,648	1,294	142	3,064	153	647	(9)	363	31,282	XXX
3. 2007.....	16,141	3,456	20,008	3,198	1,785	250	3,485	15	900	1	503	35,399	XXX
4. 2008.....	18,659	1,920	20,696	2,852	2,237	121	4,732	379	1,147	(8)	984	42,206	XXX
5. 2009.....	22,063	4,187	26,554	3,797	2,308	134	4,350	449	1,358	(2)	1,098	48,068	XXX
6. 2010.....	29,619	3,650	27,938	1,770	3,158	80	5,444	317	1,838	2	1,291	62,177	XXX
7. 2011.....	39,905	2,296	38,697	2,558	4,591	149	8,383	57	2,930	1	2,626	89,444	XXX
8. 2012.....	54,491	5,419	52,350	4,015	6,803	208	12,704	275	4,612	(0)	4,733	121,044	XXX
9. 2013.....	73,066	6,451	74,668	5,259	9,148	191	19,700	473	7,203	(38)	6,657	171,450	XXX
10. 2014.....	94,834	9,796	120,089	10,491	10,023	382	26,960	777	8,856	36	8,365	239,280	XXX
11. 2015.....	121,274	10,940	209,899	17,352	10,509	409	35,440	1,097	17,306	(83)	16,153	364,714	XXX
12. Totals...	799,607	147,771	851,961	101,915	82,194	6,182	175,411	7,660	79,124	(169)	43,521	1,724,937	XXX

	Total Losses and Loss Expenses Incurred			Loss and Loss Expense Percentage (Incurred/Premiums Earned)			Nontabular Discount		34 Inter-Company Pooling Participation Percentage	Net Balance Sheet Reserves after Discount	
	26 Direct and Assumed	27 Ceded	28 Net	29 Direct and Assumed	30 Ceded	31 Net	32 Loss	33 Loss Expense		35 Losses Unpaid	36 Loss Expenses Unpaid
1. Prior..	XXX	XXX	XXX	XXX	XXX	XXX	0	0	XXX	413,776	106,099
2. 2006.	498,268	60,771	437,496	51.3	51.0	51.4	0	0	4.84	26,562	4,719
3. 2007.	527,605	49,894	477,711	53.5	49.5	53.9	0	0	4.84	29,495	5,904
4. 2008.	642,896	60,862	582,035	64.9	62.0	65.3	0	0	4.84	34,582	7,623
5. 2009.	595,825	40,770	555,055	61.0	51.8	61.8	0	0	4.84	40,633	7,435
6. 2010.	654,688	35,985	618,703	67.5	50.5	68.8	0	0	4.84	52,138	10,040
7. 2011.	784,514	47,381	737,133	78.0	68.3	78.7	0	0	4.84	73,747	15,697
8. 2012.	774,711	102,181	672,530	75.0	133.7	70.3	0	0	4.84	97,407	23,637
9. 2013.	634,552	36,779	597,772	60.7	44.6	62.1	0	0	4.84	136,024	35,426
10. 2014.	643,900	43,399	600,501	61.6	55.9	62.1	0	0	4.84	194,636	44,644
11. 2015.	649,510	39,012	610,498	61.2	55.2	61.7	0	0	4.84	302,881	61,833
12. Totals	XXX	XXX	XXX	XXX	XXX	XXX	0	0	XXX	1,401,882	323,055

Note: Parts 2 and 4 are gross of all discounting, including tabular discounting. Part 1 is gross of only nontabular discounting, which is reported in Columns 32 and 33 of Part 1. The tabular discount, if any, is reported in the Notes to Financial Statements, which will reconcile Part 1 with Parts 2 and 4.

SCHEDULE P - PART 2 - SUMMARY

Years in Which Losses Were Incurred	Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)										DEVELOPMENT	
	1 2006	2 2007	3 2008	4 2009	5 2010	6 2011	7 2012	8 2013	9 2014	10 2015	11 One Year	12 Two Year
1. Prior.....	1,487,812	1,473,613	1,444,835	1,409,845	1,377,116	1,371,365	1,359,031	1,351,755	1,327,259	1,326,651	(608)	(25,104)
2. 2006.....	473,581	457,710	433,120	424,291	417,465	412,169	408,272	405,345	402,764	399,758	(3,006)	(5,586)
3. 2007.....	XXX	487,880	475,973	463,442	463,104	451,764	444,108	440,213	438,087	436,468	(1,619)	(3,744)
4. 2008.....	XXX	XXX	558,755	564,078	561,081	548,647	542,584	540,722	535,198	533,159	(2,040)	(7,564)
5. 2009.....	XXX	XXX	XXX	524,302	520,907	519,487	515,340	510,730	508,563	507,199	(1,364)	(3,531)
6. 2010.....	XXX	XXX	XXX	XXX	559,073	577,973	575,789	572,216	570,444	569,441	(1,003)	(2,774)
7. 2011.....	XXX	XXX	XXX	XXX	XXX	683,062	689,704	690,920	686,437	685,029	(1,408)	(5,890)
8. 2012.....	XXX	XXX	XXX	XXX	XXX	XXX	631,408	630,738	623,490	617,731	(5,759)	(13,007)
9. 2013.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	555,433	552,046	545,584	(6,462)	(9,850)
10. 2014.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	559,209	550,381	(8,828)	XXX
11. 2015.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	558,371	XXX	XXX
12. Totals.....											(32,097)	(77,051)

SCHEDULE P - PART 3 - SUMMARY

Years in Which Losses Were Incurred	Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)										11	12
	1 2006	2 2007	3 2008	4 2009	5 2010	6 2011	7 2012	8 2013	9 2014	10 2015	Number of Claims Closed With Loss Payment	Number of Claims Closed Without Loss Payment
1. Prior.....	.000	220,456	397,715	498,609	581,086	639,527	687,610	729,329	773,452	811,342	XXX	XXX
2. 2006.....	152,358	235,751	281,017	313,299	337,558	348,695	356,857	362,011	364,900	367,725	XXX	XXX
3. 2007.....	XXX	166,363	259,589	311,336	347,530	371,354	384,624	392,568	396,886	400,570	XXX	XXX
4. 2008.....	XXX	XXX	215,818	328,784	389,808	430,359	458,476	475,448	484,689	490,598	XXX	XXX
5. 2009.....	XXX	XXX	XXX	202,392	312,300	369,157	407,866	433,982	448,173	458,904	XXX	XXX
6. 2010.....	XXX	XXX	XXX	XXX	227,780	351,033	414,911	459,796	489,351	507,364	XXX	XXX
7. 2011.....	XXX	XXX	XXX	XXX	XXX	313,869	453,031	520,135	565,049	596,434	XXX	XXX
8. 2012.....	XXX	XXX	XXX	XXX	XXX	XXX	258,859	392,788	452,695	499,158	XXX	XXX
9. 2013.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	209,645	318,312	379,035	XXX	XXX
10. 2014.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	210,757	317,333	XXX	XXX
11. 2015.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	208,232	XXX	XXX

SCHEDULE P - PART 4 - SUMMARY

Years in Which Losses Were Incurred	Bulk and IBNR Reserves on Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)									
	1 2006	2 2007	3 2008	4 2009	5 2010	6 2011	7 2012	8 2013	9 2014	10 2015
1. Prior.....	809,745	696,100	582,138	506,396	433,900	389,664	351,749	325,982	277,942	256,521
2. 2006.....	221,875	145,673	94,024	67,499	50,015	38,941	31,898	26,876	23,975	19,346
3. 2007.....	XXX	213,652	133,419	91,285	70,179	50,471	37,437	29,562	24,655	21,372
4. 2008.....	XXX	XXX	224,001	138,201	98,183	64,328	47,630	38,639	28,566	23,240
5. 2009.....	XXX	XXX	XXX	212,246	123,204	87,449	60,742	43,886	34,022	27,885
6. 2010.....	XXX	XXX	XXX	XXX	205,775	129,796	84,918	57,787	41,267	32,587
7. 2011.....	XXX	XXX	XXX	XXX	XXX	225,771	132,818	91,723	62,285	46,075
8. 2012.....	XXX	XXX	XXX	XXX	XXX	XXX	232,806	139,343	91,020	62,582
9. 2013.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	220,625	136,748	90,361
10. 2014.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	233,404	137,705
11. 2015.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	229,545

THE STANDARD FIRE INSURANCE COMPANY SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories

States, Etc.	1 Active Status	Gross Premiums, Including Policy and Membership Fees Less Return Premiums and Premiums on Policies Not Taken		4 Dividends Paid or Credited to Policyholders on Direct Business	5 Direct Losses Paid (Deducting Salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Finance and Service Charges not Included in Premiums	9 Direct Premiums Written for Federal Purchasing Groups (Incl. in Col. 2)
		2 Direct Premiums Written	3 Direct Premiums Earned						
1. Alabama.....AL	L	34,833,790	30,859,611	6,313	14,037,145	16,937,220	17,025,317	298,388	0
2. Alaska.....AK	L	0	0	0	6,407	(39,686)	484,575	0	0
3. Arizona.....AZ	L	7,975,092	8,633,018	0	3,569,038	4,401,295	15,010,273	22,807	0
4. Arkansas.....AR	L	5,066,994	5,424,135	0	2,889,053	3,319,316	8,768,797	23,892	0
5. California.....CA	L	160,597,799	168,767,295	0	102,394,827	94,313,649	101,169,091	1,887,805	0
6. Colorado.....CO	L	76,281,019	65,258,802	3,014	35,861,728	44,064,755	23,190,563	342,935	0
7. Connecticut.....CT	L	146,710,430	129,800,405	8,689	57,145,094	78,844,833	84,546,087	1,168,762	0
8. Delaware.....DE	L	4,989,658	5,005,641	20	2,080,672	1,454,850	4,938,521	23,393	0
9. District of Columbia.....DC	L	22,925,703	22,419,978	0	7,682,003	8,834,548	9,486,972	167,028	0
10. Florida.....FL	L	150,832,160	104,480,522	0	43,174,614	68,421,270	52,969,302	277,509	0
11. Georgia.....GA	L	16,849,838	17,110,158	2,017	6,886,545	6,394,031	11,596,277	122,541	0
12. Hawaii.....HI	L	279,809	232,009	0	110,317	21,039	1,607,507	155	0
13. Idaho.....ID	L	7,392,150	5,953,598	0	2,786,367	4,251,257	2,170,272	70,880	0
14. Illinois.....IL	L	62,517,171	51,652,746	27,888	26,034,340	36,806,592	36,072,093	411,716	0
15. Indiana.....IN	L	37,868,202	32,932,296	167	15,472,280	19,129,055	14,839,345	253,146	0
16. Iowa.....IA	L	9,268,909	8,627,960	39,555	3,645,754	4,832,657	5,689,276	39,422	0
17. Kansas.....KS	L	24,784,902	19,553,464	0	8,486,528	11,048,611	9,335,246	149,636	0
18. Kentucky.....KY	L	27,595,361	24,267,018	117	8,902,831	11,166,929	11,348,832	162,490	0
19. Louisiana.....LA	L	21,632,880	22,097,151	1,192	5,827,084	6,257,643	12,414,806	119,438	0
20. Maine.....ME	L	14,016,988	10,743,776	26	4,519,015	5,136,837	12,490,817	123,784	0
21. Maryland.....MD	L	115,359,178	119,332,285	5,412	48,006,701	43,217,341	39,592,206	466,657	0
22. Massachusetts.....MA	L	49,139,972	31,907,547	0	22,961,114	24,141,521	12,442,350	324,526	0
23. Michigan.....MI	L	4,040,337	4,160,300	0	2,757,972	2,804,075	53,406,764	9,914	0
24. Minnesota.....MN	L	57,413,266	47,630,222	486	24,485,454	32,279,366	34,622,009	360,910	0
25. Mississippi.....MS	L	12,438,969	10,811,364	486	4,920,656	6,616,326	7,227,134	75,700	0
26. Missouri.....MO	L	59,414,399	53,673,041	0	26,437,066	32,010,832	22,106,509	397,999	0
27. Montana.....MT	L	6,980,039	4,867,359	0	1,613,661	2,955,572	3,276,635	33,712	0
28. Nebraska.....NE	L	9,987,833	8,882,412	40,040	4,415,959	5,619,944	4,363,996	38,575	0
29. Nevada.....NV	L	23,001,462	18,044,122	0	8,739,961	12,703,996	7,349,967	146,315	0
30. New Hampshire.....NH	L	8,946,258	6,976,622	25,207	2,920,838	3,300,001	2,220,732	52,420	0
31. New Jersey.....NJ	L	3,191,898	3,415,448	0	10,573,246	6,701,687	17,231,951	27,383	0
32. New Mexico.....NM	L	12,807,163	11,766,978	1,624	6,559,593	7,928,692	15,049,948	72,539	0
33. New York.....NY	L	13,893,731	14,487,168	59,143	40,889,717	31,039,616	31,216,611	150,924	0
34. North Carolina.....NC	L	75,934,192	76,899,633	3,330	33,654,382	34,107,844	43,995,143	867,099	0
35. North Dakota.....ND	L	114,182	122,146	0	33,728	(3,158)	233,940	987	0
36. Ohio.....OH	L	59,182,141	53,462,036	0	27,045,697	33,071,219	17,418,360	643,301	0
37. Oklahoma.....OK	L	31,970,175	29,231,985	0	16,759,367	17,544,130	25,249,576	66,568	0
38. Oregon.....OR	L	18,460,352	14,753,984	0	7,617,959	11,613,359	11,901,548	147,091	0
39. Pennsylvania.....PA	L	22,802,391	23,233,022	32,204	10,939,823	9,053,060	31,442,792	209,206	0
40. Rhode Island.....RI	L	5,459,705	5,706,990	0	3,080,468	3,614,841	4,507,329	53,797	0
41. South Carolina.....SC	L	31,589,599	33,188,948	0	14,286,433	12,976,170	17,369,226	328,908	0
42. South Dakota.....SD	L	1,708,959	1,187,371	0	240,296	480,207	1,204,539	1,997	0
43. Tennessee.....TN	L	28,307,352	31,176,845	0	8,805,886	7,019,997	6,751,588	163,111	0
44. Texas.....TX	L	21,731,596	22,515,382	135	8,491,433	10,462,453	55,432,366	103,362	0
45. Utah.....UT	L	15,486,321	13,247,030	49,145	6,913,513	8,526,318	7,908,096	108,182	0
46. Vermont.....VT	L	12,156,091	10,547,704	86	5,319,320	6,230,545	4,632,977	142,777	0
47. Virginia.....VA	L	47,479,465	48,969,443	1,576	16,977,780	17,121,832	17,899,572	243,463	0
48. Washington.....WA	L	20,398,399	13,150,868	0	4,860,651	7,304,343	5,415,962	96,691	0
49. West Virginia.....WV	L	5,679,762	5,364,017	2,008	1,613,287	2,171,438	3,817,090	6,263	0
50. Wisconsin.....WI	L	21,442,496	19,268,556	40,296	10,916,716	13,331,826	13,000,698	162,666	0
51. Wyoming.....WY	L	196,738	208,187	0	28,530	(1,016)	112,663	1,152	0
52. American Samoa.....AS	N	0	0	0	0	0	0	0	0
53. Guam.....GU	N	0	0	0	0	0	0	0	0
54. Puerto Rico.....PR	L	0	0	0	0	0	0	0	0
55. US Virgin Islands.....VI	L	0	0	0	0	0	0	0	0
56. Northern Mariana Islands.....MP	N	0	0	0	0	0	0	0	0
57. Canada.....CAN	N	0	0	0	0	0	0	0	0
58. Aggregate Other Alien.....OT	XXX	0	0	0	0	0	0	0	0
59. Totals.....(a) ..53		1,629,133,277	1,472,008,595	350,174	734,378,848	831,541,081	953,554,248	11,169,920	0

DETAILS OF WRITE-INS

58001.....	XXX	0	0	0	0	0	0	0	0
58002.....	XXX	0	0	0	0	0	0	0	0
58003.....	XXX	0	0	0	0	0	0	0	0
58998. Summary of remaining write-ins for Line 58 from overflow page	XXX	0	0	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above)	XXX	0	0	0	0	0	0	0	0

(a) Insert the number of "L" responses except for Canada and Other Alien.

(L) - Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) - Registered - Non-domiciled RRGs; (Q) - Qualified - Qualified or Accredited Reinsurer; (E) - Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) - None of the above - Not allowed to write business in the state.

Explanation of Basis of Allocation of Premiums by States, etc.

Location of property: 1 Fire, 2 Allied lines, 3 Farmowners, 4 Homeowners, 5 CMP, 12 Earthquake, 25 Glass, 26 Burglary and theft, 27 Boiler and machinery, 28 credit; Location of risk: 11 Medical malpractice, 14 Group A&H, 17 Other liability, 18 Products Liability; Location of garage: 19 Auto liability, 21 Auto physical damage, 8 Ocean marine - Where policy is negotiated and placed; 9 Inland marine - Where located; 10 Financial guaranty - Location of principal; 15 Other A&H - Insured's residence; 16 Workers' compensation - Location of employee's workplace; 23 Fidelity - Location of insured's principal office; 22 Aircraft - Location of airport from which insured's aircraft operates; 24 Surety - Contract: Location of Project; All Other: Location of Obligor; With respect to international commercial insurance policies (1) for U.S. based insureds with ancillary international operations, or (2) that are placed as part of a controlled master program, allocation is to the situs of the contract, which is typically the headquarter state or principal business location of the first named insured. Exceptions to this include monoline marine or other insurance policies that are designed to insure specifically identified international exposures.

**SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP
PART 1 - ORGANIZATIONAL CHART**

The Travelers Companies, Inc.	Minnesota	41-0518860 Symmetry Growth Capital II, LLC	Minnesota	76-0753165
... St. Paul Fire and Marine Insurance Company (24767) *	Connecticut	41-0406690 Upper Lake Growth Capital, LLC (99.1%)	Minnesota	41-1927945
... .. St. Paul Mercury Insurance Company (24791) *	Connecticut	41-0881659 Vesbridge Partners, LP (88.4%)	Minnesota	20-1222630
... .. St. Paul Guardian Insurance Company (24775) *	Connecticut	41-0963301 Windamere II, LLC (98.9%)	Minnesota	41-1963936
... .. St. Paul Fire and Casualty Insurance Company (40967) *	Wisconsin	41-1419276 Windamere III, LLC (99%)	Minnesota	41-2007089
... .. St. Paul Surplus Lines Insurance Company (30481) *	Delaware	41-1230819 Windamere, LLC (90.2%)	Minnesota	41-1926305
... .. The Travelers Casualty Company (41769) *	Connecticut	41-1435765	... Camperdown Corporation	Delaware	41-1762781
... .. Travelers Constitution State Insurance Company (41750) *	Connecticut	41-1435766	... SPC Insurance Agency, Inc.	Minnesota	41-1888760
... .. Northbrook Holdings, Inc.	Delaware	51-0375653	... Aprilgrange Limited	United Kingdom	
... .. Discover Property & Casualty Insurance Company (36463) *	Connecticut	36-2999370	... F&G U.K. Underwriters Limited	United Kingdom	
... .. St. Paul Protective Insurance Company (19224) *	Connecticut	36-2542404	... Travelers Underwriting Agency Limited	United Kingdom	
... .. Discover Specialty Insurance Company (10213) *	Connecticut	52-1925132	... Travelers Syndicate Management Limited	United Kingdom	
... .. United States Fidelity and Guaranty Company (25887) *	Connecticut	52-0515280 Travelers Asia Pte. Ltd.	Singapore	
... .. Fidelity and Guaranty Insurance Underwriters, Inc. (25879) *	Wisconsin	52-0616768	... St. Paul Surety Europe Limited	United Kingdom	
... .. Fidelity and Guaranty Insurance Company (35386) *	Iowa	42-1091525	... Travelers Corporate Trustee Ltd.	United Kingdom	
... .. Laurel Village Fidelity Realty, Inc.	Maryland	52-1551225	... Travelers London Limited	United Kingdom	
... .. Laurel Village Joint Venture Partnership (50%)	Minnesota	41-1616702	... St. Paul London Properties, Inc.	Minnesota	41-1880024
... .. Laurel Village I Limited Partnership (99%)	Minnesota	41-1542260	... TCI Global Services, Inc.	Delaware	52-1965525
... .. Laurel Village II Limited Partnership (99%)	Minnesota	41-1542261	... Travelers Management Limited	United Kingdom	
... .. Laurel Village III Limited Partnership (99%)	Minnesota	41-1542263	... Travelers Insurance Company Limited *	United Kingdom	AA-1121375
... .. Laurel Village IV Limited Partnership (99%)	Minnesota	41-1542264 Travelers Professional Risks Limited	United Kingdom	
... .. Laurel Village Tower A Limited Partnership (99%)	Minnesota	41-1542266	... Travelers Property Casualty Corp.	Connecticut	06-1008174
... .. Laurel Village Tower B Limited Partnership (99%)	Minnesota	41-1593312 Constitution Plaza, Inc.	Connecticut	06-0566030
... .. Laurel Village Tower C Limited Partnership (99%)	Minnesota	41-1542267 Travelers Insurance Group Holdings Inc.	Delaware	06-1445591
... .. Laurel Village Swinford Limited Partnership (99%)	Minnesota	41-1542255 The Standard Fire Insurance Company (19070) *	Connecticut	06-6033509
... .. USF&G Retail Associates GP, Inc.	Maryland	52-1704255 Standard Fire Properties, LLC	Delaware	06-6033509
... .. USF&G/Fidelity Retail Associates Limited Partnership (1%)	Maryland	52-1704256 Bayhill Restaurant II Associates (50%)	California	94-3097171
... .. USF&G/Fidelity Retail Associates Limited Partnership (83.95%)	Maryland	52-1704256 Standard Fire UK Investments, LLC	Delaware	06-6033509
... .. BMR Sports Properties, Inc.	Maryland	52-1852190 The Automobile Insurance Company of Hartford, Connecticut (19062) *	Connecticut	06-0848755
... .. Black Mountain Ranch Limited Partnership (1%)	Maryland	52-1573778 Auto Hartford Investments, LLC	Delaware	06-0848755
... .. Black Mountain Ranch Limited Partnership (85%)	Maryland	52-1573778 Travelers Personal Security Insurance Company (36145) *	Connecticut	06-1286264
... .. MMI Capital Trust I	Delaware	52-2073764 Travelers Property Casualty Insurance Company (36161) *	Connecticut	06-1286274
... .. Promenade Partners, LLC	Delaware	41-0406690 Travelers Personal Insurance Company (38130) *	Connecticut	36-3703200
... .. SPFM 101 Lincoln Centre LLC	Delaware	41-0406690 Travelers Texas MGA, Inc.	Texas	27-4469564
... .. USF&G Capital I	Delaware	52-1953822 Oregon Evergreen Investor I, LLC	Delaware	06-6033509
... .. USF&G Capital III	Delaware	52-2044075 Lone Rock Timber Investments I, LLC (75%)	Delaware	61-1639956
... .. 350 Market Street, LLC	Delaware	41-0406690 Lone Rock Timber Investments II, LLC (90%)	Delaware	32-0447309
... .. Travelers Special Services Limited	United Kingdom	 Travelers (Bermuda) Limited *	Bermuda	98-0190863
... .. Yonkers Financing Corp.	Delaware	20-3033027 Travelers Lloyds Management Company	Texas	20-4312440
... .. English Turn Fidelity Realty, Inc.	Minnesota	52-1466734 TPC Investments Inc.	Connecticut	06-1534005
... .. English Turn LLC (99%)	Minnesota	59-2635727 Travelers Casualty and Surety Company (19038) *	Connecticut	06-6033504
... .. Fidelity English Turn Club LLC (99%)	Minnesota	59-2709441 Farmington Casualty Company (41483) *	Connecticut	06-1067463
... .. English Turn LLC (1%)	Minnesota	59-2635727 8527512 Canada Inc. (77.52%)	Canada	
... .. English Turn Realty Management, Inc.	Minnesota	52-1715225 The Dominion of Canada General Insurance Company *	Canada	98-1246060
... .. Fidelity English Turn Club LLC (1%)	Minnesota	59-2709441 Travelers Insurance Company of Canada *	Canada	
... .. 8527512 Canada Inc. (22.48%)	Canada	 Travelers Casualty and Surety Company of America (31194) *	Connecticut	06-0907370
... .. The Dominion of Canada General Insurance Company *	Canada	98-1246060 Travelers Global, Inc.	Delaware	47-2215437
... .. Fog City Fund, LLC (99%)	Minnesota	41-1985480 Travelers Brazil Holding, LLC	Delaware	47-2215437

Notes:

* Denotes affiliated insurer

Unless otherwise stated, subsidiaries listed above are 100% owned by respective parent

**SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP
PART 1 - ORGANIZATIONAL CHART**

...	Travelers Brazil Acquisition LLC	Delaware	47-2215437	...	TravCo Insurance Company (28188) *	Connecticut	35-1838077
...	J. Malucelli Participações em Seguros e Resseguros S.A. ("Holdco") (49.5%)	Brazil		...	TINDY Foreign, Inc	Delaware	20-4403403
...	J. Malucelli Resseguradora S.A. *	Brazil		...	Travelers Commercial Casualty Company (40282) *	Connecticut	95-3634110
...	J. Malucelli Controle de Riscos Ltda. (0.01%)	Brazil		...	Travelers Distribution Alliance, Inc.	Delaware	62-1657094
...	J. Malucelli Seguradora S.A. *	Brazil		...	Travelers TLD, LLC	Delaware	06-0566050
...	J. Malucelli Controle de Riscos Ltda. (99.99%)	Brazil		...	Tiercel, LLC	Delaware	06-0566050
...	J. Malucelli Latam S.A. (49.5%)	Brazil		...	Redstart, LLC	Delaware	06-0566050
...	JMalucelli Travelers Seguros S.A. (51%) *	Colombia		...	The Travelers Home and Marine Insurance Company (27998) *	Connecticut	35-1838079
...	Travelers Participações em Seguros Brasil S.A. (95%)	Brazil		...	The Travelers Lloyds Insurance Company (41262) *	Texas	76-0002592
...	Travelers Seguros Brasil S.A. *	Brazil		...	Travelers Marine, LLC	Delaware	06-0566050
...	Travelers Casualty Insurance Company of America (19046) *	Connecticut	06-0876835				
...	Travelers Casualty Company of Connecticut (36170) *	Connecticut	06-1286266				
...	Travelers Casualty UK Investments LLC	Delaware	06-6033504				
...	Travelers Commercial Insurance Company (36137) *	Connecticut	06-1286268				
...	Travelers Excess and Surplus Lines Company (29696) *	Connecticut	06-1203698				
...	Travelers Lloyds of Texas Insurance Company (41564) *	Texas	75-1732040				
...	Travelers MGA, Inc.	Texas	75-2676034				
...	The Travelers Indemnity Company (25658) *	Connecticut	06-0566050				
...	Arch Street North LLC	Delaware	06-0566050				
...	The Charter Oak Fire Insurance Company (25615) *	Connecticut	06-0291290				
...	Travelers Real Estate, LLC	Delaware	06-0566050				
...	First Floridian Auto and Home Insurance Company (10647) *	Florida	59-3372141				
...	Gulf Underwriters Insurance Company (42811) *	Connecticut	56-1371361				
...	Select Insurance Company (22233) *	Texas	75-6013697				
...	Travelers Casualty and Surety Company of Europe, Limited *	United Kingdom					
...	Commercial Guaranty Insurance Company (38385) *	Delaware	75-1679830				
...	Crystal Brook, LLC	Delaware	06-0566050				
...	Durham Holding, LLC	Delaware	06-0566050				
...	Sutton Holdco, LLC	Delaware	06-0566050				
...	Cadet Limited, LLC	Delaware	06-0566050				
...	Arrowhead Company, LLC	Delaware	06-0566050				
...	Eastern Asset, LLC	Delaware	06-0566050				
...	Jupiter Holdings, Inc.	Minnesota	41-1769846				
...	American Equity Insurance Company (43117) *	Arizona	86-0703220				
...	American Equity Specialty Insurance Company (10819) *	Connecticut	86-0868106				
...	Northland Insurance Company (24015) *	Connecticut	41-6009967				
...	Northfield Insurance Company (27987) *	Iowa	41-0983992				
...	Northland Casualty Company (24031) *	Connecticut	94-6051964				
...	Travelers Indemnity U.K. Investments LLC	Connecticut	06-0566050				
...	TPC U.K. Investments LLC	Delaware	06-0566050				
...	The Phoenix Insurance Company (25623) *	Connecticut	06-0303275				
...	The Travelers Indemnity Company of America (25666) *	Connecticut	58-6020487				
...	The Travelers Indemnity Company of Connecticut (25682) *	Connecticut	06-0336212				
...	Travelers Property Casualty Company of America (25674) *	Connecticut	36-2719165				
...	American Marine Management Services, Inc. (47.5%)	New York	13-2743602				
...	Constitution State Services, LLC	Delaware	06-1501229				
...	Phoenix UK Investments LLC	Delaware	06-0303275				
...	The Premier Insurance Company of Massachusetts (12850) *	Connecticut	04-3175569				

Notes:

* Denotes affiliated insurer

Unless otherwise stated, subsidiaries listed above are 100% owned by respective parent

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