REPORT ON EXAMINATION

OF

OLYMPUS INSURANCE COMPANY

ORLANDO, FLORIDA

AS OF

DECEMBER 31, 2008

BY THE

OFFICE OF INSURANCE REGULATION

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Tallahassee, Florida

June 25, 2009

Kevin M. McCarty
Commissioner
Office of Insurance Regulation
State of Florida
Tallahassee, Florida 32399-0326

Dear Sir:

Pursuant to your instructions, in compliance with Section 624.316, Florida Statutes, and in accordance with the practices and procedures promulgated by the National Association of Insurance Commissioners (NAIC), we have conducted an examination as of December 31, 2008, of the financial condition and corporate affairs of:

OLYMPUS INSURANCE COMPANY
7380 SAND LAKE ROAD, SUITE 115
ORLANDO, FLORIDA 32819-5250

Hereinafter referred to as, the "Company". Such report of examination is herewith respectfully submitted.

SCOPE OF EXAMINATION

This examination covered the period of May 31, 2007, (inception) through December 31, 2008. This was the first examination of the Company. This examination commenced with planning at the Office, April 13, through April 17, 2009. The fieldwork commenced April 20, 2009, and concluded as of June 25, 2009.

This financial examination was a statutory financial examination conducted in accordance with the Financial Condition Examiners Handbook, Accounting Practices and Procedures Manual and annual statement instructions promulgated by the NAIC as adopted by Rules 69O-137.001(4) and 69O-138.001, Florida Administrative Code, with due regard to the statutory requirements of the insurance laws and rules of the State of Florida. Considering this Company's size and its very limited control environment, a comprehensive assessment of the Company's corporate governance, internal controls and risk management environment was determined not to be an effective use of examination resources. Therefore, a modified risk–focus surveillance approach was taken and a reduced evaluation of the Company's enterprise risk management structure and control environment was performed during the examination.

The Financial Condition Examiners Handbook requires that the examination be planned and performed to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. An examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation and management's compliance with Statutory Accounting Principles and annual statement instructions when applicable to domestic state regulations.

Risk-focused examinations consist of a seven-phase process that can be used to identify and assess risk, assess the adequacy and effectiveness of strategies/controls used to mitigate risk and assist in determining the extent and nature of procedures and testing to be utilized in order to complete the review of that activity. The process should generally include a determination of the quality and reliability of the corporate governance structure and risk management programs. In addition, it can be used for verification of specific portions of the financial statements or other limited-scope reviews, increased focus on, and can result in increased substantive testing of, accounts identified as being at high risk of misstatement. Conversely, the risk assessment process should result in decreased focus on, and fewer substantive tests on the accounts identified as being at low risk of misstatement. The risk-focused surveillance process can be used to assist examiners in targeting areas of high-risk.

In this examination, emphasis was directed to the quality, value and integrity of the statement of assets and the determination of liabilities, as those balances affect the financial solvency of the Company as of December 31, 2008. Transactions subsequent to year-end 2008 were reviewed where relevant and deemed significant to the Company's financial condition.

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

The examination included a review of the corporate records and other selected records deemed pertinent to the Company's operations and practices. In addition, the NAIC IRIS ratio reports, the Company's independent audit reports and certain work papers prepared by the Company's independent certified public accountant (CPA) and other reports as considered necessary were reviewed and utilized where applicable within the scope of this examination.

This report on examination was confined to financial statements and comments on matters that involved departures from laws, regulations or rules, or which were deemed to require special explanation or description.

Status of Adverse Findings from Prior Examination

This was the first examination of the Company.

HISTORY

General

The Company was incorporated in Florida on May 31, 2007, and commenced business August 8, 2007, as Olympus Insurance Company.

The Company was party to Consent Order 90263-07-CO filed May 27, 2007 with the Office regarding the application for the issuance of a Certificate of Authority. The Company was in compliance with the provisions of this consent order.

The Company was authorized to transact the following insurance coverage in Florida on December 31, 2008:

Fire	Allied lines
Homeowners multi peril	Commercial multi peril
Inland marine	Other liability
Mobile home multi peril	Mobile home physical damage

The Company was in compliance with Section 624.430 (1), Florida Statutes.

The Articles of Incorporation and the Bylaws were not amended during the period covered by this examination.

Capital Stock

As of December 31, 2008, the Company's capitalization was as follows:

Number of authorized common capital shares	35,000
Number of shares issued and outstanding	35,000
Total common capital stock	$35,000
Par value per share	$1.00

Control of the Company was maintained by its parent, Gemini Financial Holdings Corporation, a Delaware corporation, who owned 100% of the stock issued by the Company, and in turn was 100% owned by Gemini Financial Holdings LLC, a Delaware corporation.

Profitability of Company

The following table shows the profitability trend (in dollars) of the Company for the period of operations, as reported in the filed annual statements.

	2008	2007
Premiums Earned	$22,799,375	$1,178,269
Net Underwriting Gain/(Loss)	(10,124,852)	(9,870,447)
Net Income	(9,489,162)	(9,508,107)
Total Assets	69,958,106	74,136,248
Total Liabilities	35,335,094	30,419,022
Surplus As Regards Policyholders	$34,623,012	$43,737,226

The underwriting expense ratios were very high for 2007 and 2008, 38.09% and 65.95%, respectively and have contributed to the loss of $10,000,000 in 2007 and another $10,000,000 in 2008. The Company explained that the losses related to high reinsurance costs relative to the level of direct premiums written as well as high underwriting expenses, running in the 40% range.

Dividends to Stockholders

During the period of this examination, the Company did not pay any dividends to stockholders.

Management

There was no evidence provided by the Company indicating that an annual shareholder meeting for the election of directors was held in accordance with Sections 607.1601 and 628.231, Florida Statutes. Directors, as reported in the Company's annual statement, serving as of December 31, 2008, were:

Directors

Name and Location	**Principal Occupation**
Barry Michael Fox	Operating Advisor, Pegasus Capital Investors
William Ketchin Lowry, Jr.	President of the Company
Daniel Benjamin Stencel	Chief Financial Officer, Pegasus Capital Investors
Jeffery Bernard Scott	Operating Advisor, Pegasus Capital Investors
Steven Warren Wacaster	Vice President, Pegasus Capital Investors

The Board of Directors minutes were not provided; therefore, the examiners were unable to verify the proper election of officers by the Board and determine if that election was in accordance with the Company's bylaws. **Subsequent Event**: On February 11, 2010, the Company provided the

Board of Directors meeting minutes for November 26, 2007, September 15, 2009 and October 16, 2009. The Company reported the following senior officers in its annual statement:

Senior Officers

Name	**Title**
Barry Michael Fox	Chairman, CEO and Secretary
William Ketchin Lowry, Jr.	President and CFO

The Company did not maintain an audit committee, as required by Section 624.424(8) (c), Florida Statutes.

Conflict of Interest Procedure

There was no evidence that conflicts of interest statements existed in accordance with the NAIC Financial Condition Examiners Handbook. **Subsequent Event:** The Company provided evidence of conflict of interest statements for each of the 5 directors, dated on various dates in January, 2010 and February, 2010.

Corporate Records

As previously stated, no corporate records (Stockholder or Board of Director minutes of meetings or actions) were provided to the examiners.

This was in violation of Section 607.1601, Florida Statutes, which requires the following:

> A corporation shall keep as permanent records minutes of all meetings of its shareholders and board of directors, a record of all actions taken by the shareholders or board of directors without a meeting, and a record of all actions taken by a committee of the board of directors in place of the board of directors on behalf of the corporation. (4) A

corporation shall maintain its records in written form or in another form capable of conversion into written form within a reasonable time.

All stockholder and Board of Director minutes were not provided to the examiners; therefore, a determination regarding Stockholder and Board compliance with the following Florida Statutes, Rules or NAIC requirements could not be made.

1. Approval of Investments
2. Selection of an outside CPA
3. Conflict of Interest Disclosure and Resolution
4. Compliance with the provisions in the approved Bylaws
5. Designation of an audit committee
6. Approval of Significant Agreements
7. Required action for the appointment or election of board members and officers of the Company
8. Proper action on changes in Articles and/or Bylaws
9. Action on the appointment of actuary before year-end in accordance with NAIC Annual Statement Instructions
10. Proper action on changes to the membership serving on the Board
11. Proper approval of the appointment of any Managing General Agents
12. Determination of any significant events subsequent to the examination date
13. Examination determination of proper Corporate Governance activities
14. Disclosure of significant commitments or contingent liabilities

Subsequent event: On February 11, 2010 the Company provided the stockholder and Board of Directors meeting minutes for November 26, 2007, September 15, 2009 and October 16, 2009.

Acquisitions, Mergers, Disposals, Dissolutions, and Purchase or Sales Through Reinsurance

During the period of this examination, there were no acquisitions, mergers, disposals, dissolutions or purchase or sales through reinsurance.

Surplus Debentures

On June 28, 2007, the Company issued a surplus note with a par value of $16,500,000 in return for cash. The surplus note was made under the Insurance Capital Build-up Incentive Program administered by the State Board of Administration of Florida (SBA). The carrying amount of the note at December 31, 2008, was $16,500,000.

The surplus note accrued interest on the unpaid principal balance at a rate equivalent to the 10-year US Treasury bond rate. The rate was adjusted quarterly for the term of the surplus note based on the 10-year Constant Maturity Treasury rate. For the first three years of the surplus note, the Company was required to pay interest only. The note matures in 20 years from the date of funding. After three years, principal and interest will be paid through the maturity date of the note. All principal and interest payments must be approved by the Office prior to payment.

The Company was required by the SBA to maintain surplus of $50,000,000 except for the impact of catastrophic events and the reduction of surplus resulting from the expensing of acquisition costs on a statutory basis. Also, the SBA required the Company to maintain the agreed upon minimum net premium to surplus ratio, which was designated as 1:1 for 2008, and will be 1.5:1 for 2009. At December 31, 2008, the Company's ratio fell below the required minimum. As such, the SBA increased the Company's interest rate on the surplus note by .25%; further, the rate was increased an additional 450 basis points for the first quarter of 2009 as the Company's capital and surplus fell below the $50,000,000 floor described above. This rate increase will remain until the agreed upon minimum writing ratio is met, which was 1:1 for 2008, and will be 1.5:1 for 2009.

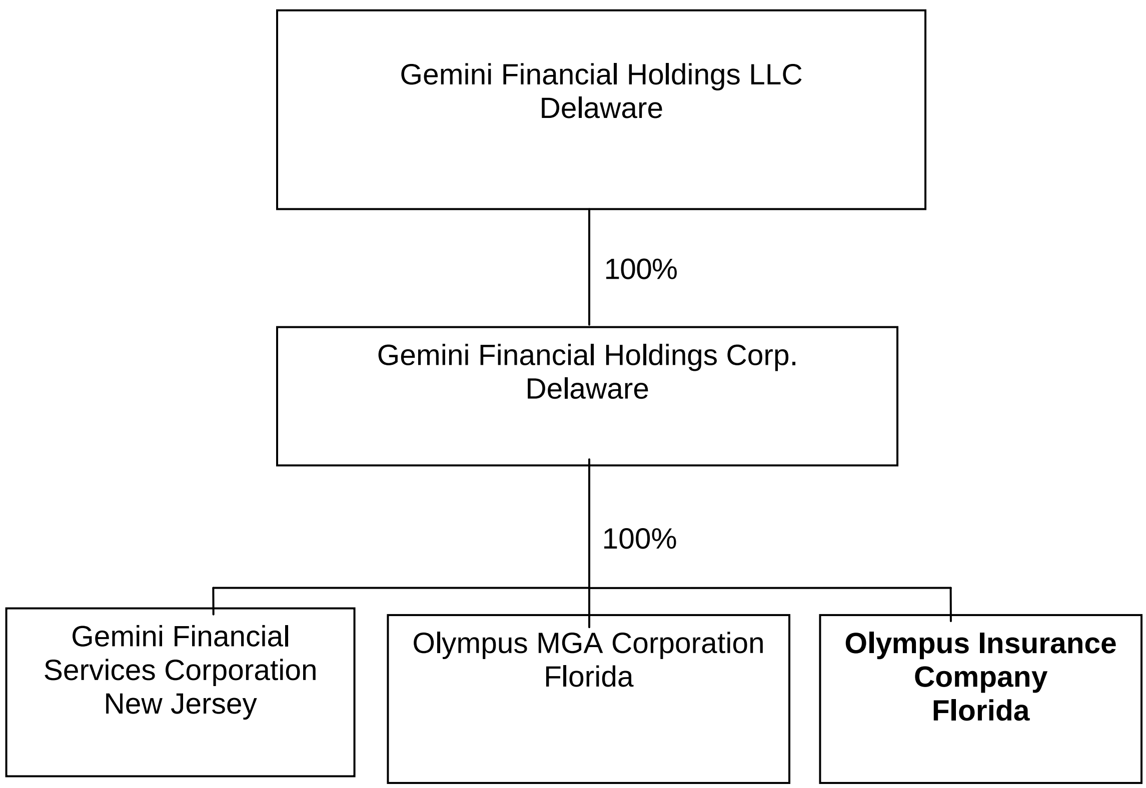
AFFILIATED COMPANIES

The Company was a member of an insurance holding company system as defined by Rule 69O-143.045(3), Florida Administrative Code. The latest holding company registration statement was filed with the State of Florida on February 27, 2009, as required by Section 628.801, Florida Statutes, and Rule 69O-143.046, Florida Administrative Code.

A simplified organizational chart as of December 31, 2008, reflecting the holding company system, is shown below. Schedule Y of the Company's 2008 annual statement provided a list of all related companies of the holding company group.

OLYMPUS INSURANCE COMPANY
ORGANIZATIONAL CHART

DECEMBER 31, 2008



The following agreements were in effect between the Company and its affiliates:

Tax Allocation Agreement

The Company was a participant in a Tax Allocation Agreement with its affiliates, and as such prepared a consolidated return for filing. All participating entities were disclosed in the Agreement.

Management Agreement

The Company entered into an Intercompany Services Agreement on May 22, 2007, with Gemini Financial Services Corporation (Gemini), an affiliate. Under the terms of this agreement, Gemini provided all human resources, purchasing, treasury, tax and finance, bookkeeping, management and information, lease payment and other services. The Company paid a charge equal to all costs, direct and in-direct, reasonably and equitably determined by Gemini.

Managing General Agent Agreement

The Company had a Managing General Agent and Claims Administration Agreement, effective May 22, 2007, with Olympus MGA Corporation (MGA), an affiliate. Under the terms of this agreement, MGA provided all underwriting, policy administration, agent services, claims settlement, and executive management services for the Company. For these services, MGA received a 22% commission (inclusive of a 5% executive management fee) plus the actual acquisition expenses paid to producing agents and actual third party administration costs for underwriting, policy administration and claims settlement. In addition, MGA received a profit sharing distribution from the Company equal to 5% of statutory underwriting profits. The profit sharing distribution accrued for 2008 was zero.

FIDELITY BOND

The Company did not have fidelity bond coverage as of December 31, 2008. **Subsequent Event:** The Company obtained fidelity bond coverage dated July 30, 2009 – July 30, 2010 in the amount of $500,000 with a deductible of $50,000, which adequately covered the suggested minimum as recommended by the NAIC.

PENSION, STOCK OWNERSHIP AND INSURANCE PLANS

The Company did not have any pension or stock ownership plans. Employee insurance benefits were provided through the Company's immediate parent, Gemini Financial Holdings Corporation.

STATUTORY DEPOSITS

The following securities were deposited with the State of Florida as required by Section 624.411, Florida Statutes:

STATE	Description	Par Value	Market Value
Florida	Cash Deposit	$ 321,951	$ 321,951
TOTAL SPECIAL DEPOSITS		$ 321, 951	$ 321,951

INSURANCE PRODUCTS

Territory

The Company was authorized to transact insurance only in the State of Florida.

Treatment of Policyholders

The Company established procedures for handling written complaints in accordance with Section 626.9541(1) (j), Florida Statutes.

The Company maintained a claims procedure manual that included detailed procedures for handling each type of claim in accordance with Section 626.9541(1) (i) 3a, Florida Statutes.

REINSURANCE

The reinsurance agreements reviewed complied with NAIC standards with respect to the standard insolvency clause, arbitration clause, transfer of risk, reporting and settlement information deadlines.

Assumed

The Company did not assume risk during the period of this examination.

Ceded

The Company utilized reinsurance intermediary Benfield (now AonBenfield). Benfield provided reinsurance program design and placement as well as catastrophe modeling and other risk management services during the period of this examination. Subsequent to the examination period, on June 1, 2009, Guy Carpenter and Company was retained as the Company's principal reinsurance intermediary.

At December 31, 2008, the Company had the following ceded reinsurance coverages:

- Catastrophe excess of loss coverage with unaffiliated reinsurers, as well as a reimbursement contract with the Florida Hurricane Catastrophe Fund (FHCF). The

Company had estimated its retention under this contract to be approximately $37.5 million and $23.0 million, per event, for the years ended December 31, 2008 and 2007, respectively.

Through the FHCF traditional layer as well as optional increased coverage limits selected by the Company, 90% of losses in excess of the estimated retention up to $164.9 million (estimated) and $184.6 million (estimated) for the years ended December 31, 2008 and 2007, respectively, per event, were assumed by the FHCF.

Losses beneath, in excess, or beyond the scope, of the coverage provided by the FHCF contract were covered under the Company's catastrophe excess of loss contracts. At December 31, 2008 and 2007, the Company's retention under this contract amounted to $5 million per occurrence, with losses in excess of retention up to $117 million and $40 million respectively per occurrence, assumed by the reinsurers. These contracts provided for reinstatement of coverage in the event the Company's protection was exhausted; however, in no event will the reinsurer be liable for more than $224 million and $70 million, respectively, during the term of these contracts.

- The Company also had non-hurricane excess per risk coverages as follows:

First XOL:

$250k Per Risk Limit
$500k Per Occurrence Limit
Term limit = 2x Per occurrence limit

Second XOL:

$2MM Per Risk Limit
$2MM Per Occurrence Limit
Term limit = 3x Per occurrence limit

- The Company also ceded 100% of its Identity Fraud Expense Coverage under a quota share treaty. Under the terms of the treaty, the reinsurer covered & indemnified the Company 100% of policyholder losses that occurred & met the definition of "identity fraud expense coverage" provided in the contract up to a maximum of $25k for each coverage in a 12 month period.

ACCOUNTS AND RECORDS

The Company maintained its principal operational offices in Orlando, Florida, where this examination was conducted. As previously stated, through a Managing General Agent and Claims Administration Agreement with Olympus MGA Corporation (MGA), an affiliate, the Company outsourced its underwriting and policy administration to Seibels, Bruce & Company (Seibels), located in Columbia, South Carolina.

Through that same agreement the Company also outsourced its claims processes to Seibels and its subsidiary, Insurance Network Services, Inc. The claims administration services were performed under a set of guidelines established by the Company and include claims investigation, claims negotiation/settlement, provided a Catastrophic Response Team, prepared and maintained claim files and records, provided and developed necessary computer software, took all necessary and appropriate salvage and subrogation recovery efforts, and maintained a complaint log. It was determined during the examination, that policy and claims records maintained by Seibels in its computers were available for examination through a web based system in the Company's home office.

An independent CPA audited the Company's statutory basis financial statements annually for the years 2007 and 2008, in accordance with Section 624.424(8), Florida Statutes. Supporting work papers were prepared by the CPA as required by Rule 69O-137.002, Florida Administrative Code.

The Company's accounting records were maintained by Seibels and in the home office on a computerized system. The Company's balance sheet accounts were verified with the line items of the annual statement submitted to the Office.

The Company and non-affiliates had the following agreement:

Custodial Agreement

The Company signed a domestic custody agreement with JPMorgan Chase Bank, NA, dated September 24, 2007. It was determined that the custodial bank met the custodial qualifications of Rule 69O-143.041, Florida Administrative Code. A review of that agreement determined that it met the requirements and was in compliance with Rule 690-143.042, Florida Administrative Code.

Information Technology Report

INS Services, Inc. performed an evaluation of the information technology and computer systems of the Company. Results of the evaluation were noted in the Information Technology Report provided to the Company.

FINANCIAL STATEMENTS PER EXAMINATION

The following pages contain financial statements showing the Company's financial position as of December 31, 2008, and the results of its operations for the year then ended as determined by this examination. Adjustments made as a result of the examination are noted in the section of this report captioned, "Comparative Analysis of Changes in Surplus."

OLYMPUS INSURANCE COMPANY
Assets
DECEMBER 31, 2008

	Per Company	Examination Adjustments	Per Examination
Bonds	$ 38,150,333		$ 38,150,333
Cash:	23,676,869		23,676,869
Investment income due and accrued	423,383		423,383
Agents' Balances:			
Deferred premium	3,107,471		3,107,471
Current federal and foreign income tax recoverable and interest thereon	665,106		665,106
Net deferred tax asset	3,741,601		3,741,601
Electronic data processing equipment and software	193,343		193,343
Totals	$ 69,958,106	$ -	$ 69,958,106

OLYMPUS INSURANCE COMPANY
Liabilities, Surplus and Other Funds

DECEMBER 31, 2008

	Per Company	Examination Adjustments	Per Examination
Losses	$ 5,819,459	$ -	$ 5,819,459
Loss adjustment expenses	904,462		904,462
Other expenses	388,207		388,207
Taxes, licenses and fees	620,715		620,715
Unearned premiums	27,242,867		27,242,867
Ceded reinsurance premiums payable	(3,720,579)		(3,720,579)
Provision for reinsurance	39,035		39,035
Payable to parent, subsidiaries and affili	4,040,928		4,040,928
Total Liabilities	$ 35,335,094	$ -	$ 35,335,094
Common capital stock	$ 35,000		$ 35,000
Surplus Notes	16,500,000		16,500,000
Gross paid in and contributed surplus	33,498,334		33,498,334
Unassigned funds (surplus)	(15,410,322)		(15,410,322)
Surplus as regards policyholders	$ 34,623,012	$ -	$ 34,623,012
Total liabilities, surplus and other funds	$ 69,958,106	$ -	$ 69,958,106

OLYMPUS INSURANCE COMPANY
Statement of Income
DECEMBER 31, 2008

Underwriting Income		
Premiums earned	$	22,799,375
Deductions:		
Losses incurred		13,268,613
Loss expenses incurred		2,613,384
Other underwriting expenses incurred		17,042,230
Total underwriting deductions	$	32,924,227
Net underwriting gain or (loss)	$	(10,124,852)
Investment Income		
Net investment income earned		$899,558
Net realized capital gains or (losses)		(246,743)
Net investment gain or (loss)	$	652,815
Other Income		
Net gain or (loss) from agents' or premium balances charged off	$	(17,125)
Finance and service charges not included in premiums		0
Aggregate write-ins for miscellaneous income		0
Total other income	$	(17,125)
Net income before dividends to policyholders and before federal & foreign income taxes	$	(9,489,162)
Net Income, after dividends to policyholders, but before federal & foreign income taxes	$	(9,489,162)
Net Income	$	(9,489,162)
Capital and Surplus Account		
Surplus as regards policyholders, December 31 prior year	$	43,737,226
Net Income	$	(9,489,162)
Change in net deferred income tax		509,815
Change in non-admitted assets		(95,832)
Change in provision for reinsurance		(39,035)
Change in surplus as regards policyholders for the year	$	(9,114,214)
Surplus as regards policyholders, December 31 current year	$	34,623,012

COMMENTS ON FINANCIAL STATEMENTS

Liabilities

Losses and Loss Adjustment Expenses $6,723,921

An outside actuarial firm appointed by the Board of Directors, rendered an opinion that the amounts carried in the balance sheet as of December 31, 2008, made a reasonable provision for all unpaid loss and loss expense obligations of the Company under the terms of its policies and agreements. INS Consultants, Inc., who provided the examination actuary, was in concurrence with this opinion.

Ceded Reinsurance Premiums Payable $(3,720,579)

It was noted that the Company reported a debit balance liability, totaling $3,720,579 which included paid ceded premiums, totaling $525,000 in relation to unauthorized reinsurers. This was in violation of Section 624.610(4), Florida Statutes, regarding credit for ceded reinsurance. The net effect was that the Company was reducing its overall liabilities by that total. This amount was unsecured and the Company should have reported the balance along with other paid ceded premiums as an asset and offset the unauthorized portion by a corresponding increase its Provision for Unauthorized Reinsurance. The unsecured balance in relation to unauthorized reinsurers was below examination materiality, therefore, no financial adjustment was made. **We recommend that the Company not report debit balance liabilities in unauthorized companies in ceded balances payable to comply with Section 624.610(4), Florida Statutes. Subsequent Event: The Company made corrections to the ceded reinsurance premiums payable on the Quarterly Financial Statements as of March 30,**

2009, June 30, 2009 and September 30, 2009 to comply with Section 624.610(4), Florida Statutes.

Capital and Surplus

The amount reported by the Company of $34,623,012, exceeded the minimum of $4,000,000 required by Section 624.408, Florida Statutes. A comparative analysis of changes in surplus is shown below.

OLYMPUS INSURANCE COMPANY
COMPARATIVE ANALYSIS OF CHANGES IN SURPLUS
DECEMBER 31, 2008

The following is a reconciliation of Surplus as regards policyholders between that reported by the Company and as determined by the examination.

Surplus as Regards Policyholders December 31, 2008, per Annual Statement				$34,623,012
	PER COMPANY	PER EXAM	INCREASE (DECREASE) IN SURPLUS	
ASSETS:				
No Adjustment			$ -	
LIABILITIES:				
No Adjustment			$ -	
Net Change in Surplus:				$ -
Surplus as Regards Policyholders December 31, 2008, Per Examination				$ 34,623,012

SUMMARY OF FINDINGS

Compliance with previous directives

This was the first examination of the Company performed by the Office.

Current examination comments and corrective action

There were no findings, exceptions or corrective action to be taken by the Company for the examination as of December 31, 2008.

SUBSEQUENT EVENTS

A revised MGA agreement has been filed with the Office which is currently being reviewed.

The Company entered into a Consent Order filed December 1, 2009 in which the Office authorized the Company to repay the $16,500,000 surplus note to the SBA effective immediately. The Consent Order also stipulates that the Company may enter into an 80% quota share reinsurance contract provided the contract transfers risk in accordance with SSAP 62 and complies with Section 624.610, Florida Statutes.

In August, 2009, the Company was notified that the St. James Insurance Group had filed a lawsuit against Olympus claiming wrongful termination of a marketing agreement. Olympus filed a counterclaim for breach of contract, tortious interference, and damages for the same. The outcome of the lawsuit and counterclaim are unknown at present.

CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of **Olympus Insurance Company** as of December 31, 2008, consistent with the insurance laws of the State of Florida.

Per examination findings, the Company's Surplus as regards policyholders was $34,623,012, in compliance with Section 624.408, Florida Statutes.

In addition to the undersigned, Jerry Golden, Financial Examiner/Analyst II, Florida Office of Insurance Regulation, Patricia Casey Davis, CFE, CPA; Hails W. Taylor, CFE, Robert McGee, CFE all of INS Regulatory Insurance Services, Inc. participated in the examination. We also recognize INS Consultants, Inc. and INS Services, Inc.'s participations in this examination.

Respectfully submitted,

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Mary James, CFE, CPM
Chief Examiner
Florida Office of Insurance Regulation