PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

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ANNUAL STATEMENT

For the Year Ended December 31, 2018

OF THE CONDITION AND AFFAIRS OF THE

ST. PAUL FIRE AND MARINE INSURANCE COMPANY

NAIC Group Code 3548 3548 NAIC Company Code 24767 Employer's ID Number 41-0406690
(Current Period) (Prior Period)

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

INCORPORATED/ORGANIZED, APRIL 20, 1925 COMMENCED BUSINESS, APRIL 22, 1925

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: **385 Washington Street, St. Paul, MN, US 55102 (651) 310-7911**
Internet Website Address: **www.travelers.com**
Statutory Statement Contact: **Michael J. Doody (860) 277-3966**
Annual.Statement.Contact@travelers.com (844) 816-9447
(E-Mail Address) (Fax Number)

OFFICERS

	Name	Title
1. #	NICHOLAS SEMINARA	President
2. #	JAY STEVEN BENET	Vice Chairman
3.	WILLIAM HERBERT HEYMAN	Vice Chairman & Chief Investment Officer
4.	AVROHOM YAAKOV KESS	Vice Chairman & Chief Legal Officer
5.	ANDY FRANCIS BESSETTE	Executive Vice President & Chief Administrative Officer
6. #	DANIEL STEPHEN FREY	Executive Vice President & Chief Financial Officer
7.	BRUCE RICHARD JONES	Executive Vice President, Enterprise Risk Management & Chief Risk Officer

	Name	Title
#	CHRISTINE KUCERA KALLA	Executive Vice President, General Counsel & Chief Ethics & Compliance Officer
#	MOJGAN MEHDIAN LEFEBVRE	Executive Vice President & Chief Information Officer, Enterprise Operations and eBusiness
	DOUGLAS KEITH BELL	Senior Vice President, Accounting Policy
#	DOUGLAS KENNETH RUSSELL	Senior Vice President, Treasurer & Corporate Controller
	SCOTT WILLIAM RYNDA	Senior Vice President, Corporate Tax
#	JULIE MARIE JOYCE	Vice President & Chief Corporate Actuary
	WENDY CONSTANCE SKJERVEN	Vice President, Corporate Secretary & Group General Counsel

DIRECTORS

DANIEL STEPHEN FREY
WILLIAM HERBERT HEYMAN
CHRISTINE KUCERA KALLA
NICHOLAS SEMINARA
GREGORY CHESHIRE TOCZYDLOWSKI

STATE OF MINNESOTA
COUNTY OF RAMSEY } 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.

Nicholas Seminara	Wendy C. Skjerven	Douglas K. Russell
President	Secretary	Controller

Subscribed and sworn to before me this
22nd day of January, 2019

Notary Public

RENEE KAY RANTA
Notary Public
Minnesota
My Commission Expires January 31, 2021

My Commission Expires January 31, 2021

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)	12,891,814,320	0	12,891,814,320	12,143,015,713
2. Stocks (Schedule D):				
2.1 Preferred stocks	1,195,000	0	1,195,000	1,195,000
2.2 Common stocks	1,987,347,776	10,080,046	1,977,267,731	1,979,334,836
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)	28,800,665	0	28,800,665	28,480,187
4.2 Properties held for the production of income (less $.....0 encumbrances)	776,896,680	0	776,896,680	754,866,818
4.3 Properties held for sale (less $.....0 encumbrances)	0	0	0	0
5. Cash ($.....32,757,513, Schedule E-Part 1), cash equivalents ($.....0, Schedule E-Part 2) and short-term investments ($.....472,856,169, Schedule DA)	505,613,683	0	505,613,683	586,319,816
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)	727,061,472	36,484,228	690,577,244	730,164,738
9. Receivables for securities	310,938	0	310,938	10,000,040
10. Securities lending reinvested collateral assets (Schedule DL)	145,140,015	0	145,140,015	125,113,321
11. Aggregate write-ins for invested assets	(152,150)	0	(152,150)	(152,150)
12. Subtotals, cash and invested assets (Lines 1 to 11)	17,064,028,399	46,564,273	17,017,464,126	16,358,338,317
13. Title plants less $.....0 charged off (for Title insurers only)	0	0	0	0
14. Investment income due and accrued	120,222,829	0	120,222,829	111,401,918
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	732,952,194	43,486,550	689,465,645	666,601,355
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including $.....32,154,227 earned but unbilled premiums)	1,255,053,640	6,640,227	1,248,413,413	1,200,356,349
15.3 Accrued retrospective premiums ($.....0) and contracts subject to redetermination ($.....0)	22,997,727	2,337,885	20,659,842	21,386,725
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	43,354,593	0	43,354,593	45,251,640
16.2 Funds held by or deposited with reinsured companies	4,647,809	0	4,647,809	5,809,117
16.3 Other amounts receivable under reinsurance contracts	0	0	0	0
17. Amounts receivable relating to uninsured plans	0	0	0	0
18.1 Current federal and foreign income tax recoverable and interest thereon	21,876,656	0	21,876,656	0
18.2 Net deferred tax asset	298,740,960	85,185,795	213,555,165	213,028,984
19. Guaranty funds receivable or on deposit	14,621	0	14,621	7,473
20. Electronic data processing equipment and software	20,907	0	20,907	0
21. Furniture and equipment, including health care delivery assets ($.....0)	19,664,296	19,664,296	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	0	0	0	0
24. Health care ($.....0) and other amounts receivable	0	0	0	0
25. Aggregate write-ins for other-than-invested assets	100,558,361	3,951,130	96,607,231	94,236,116
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	19,684,132,993	207,830,156	19,476,302,837	18,716,417,995
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0	0	0
28. TOTAL (Lines 26 and 27)	19,684,132,993	207,830,156	19,476,302,837	18,716,417,995
DETAILS OF WRITE-INS				
1101. Deferred gain	(152,150)	0	(152,150)	(152,150)
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 through 1103 plus 1198) (Line 11 above)	(152,150)	0	(152,150)	(152,150)
2501. Equities and deposits in pools and associations	27,088,966	0	27,088,966	25,802,207
2502. Real estate operating fund	22,367,765	2,300,043	20,067,722	18,303,886
2503. COLI supplemental benefits trust	19,621,487	0	19,621,487	21,055,490
2598. Summary of remaining write-ins for Line 25 from overflow page	31,480,143	1,651,087	29,829,056	29,074,534
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)	100,558,361	3,951,130	96,607,231	94,236,116

LIABILITIES, SURPLUS AND OTHER FUNDS

		1 Current Year	2 Prior Year
1.	Losses (Part 2A, Line 35, Column 8)	7,984,646,252	7,733,842,902
2.	Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6)	353,372,539	330,329,512
3.	Loss adjustment expenses (Part 2A, Line 35, Column 9)	1,857,084,301	1,828,248,006
4.	Commissions payable, contingent commissions and other similar charges	189,131,733	176,363,243
5.	Other expenses (excluding taxes, licenses and fees)	154,968,281	157,207,685
6.	Taxes, licenses and fees (excluding federal and foreign income taxes)	82,033,738	86,785,026
7.1	Current federal and foreign income taxes (including $.....0 on realized capital gains (losses))	0	40,277,906
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 $.....163,008,406 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)	2,745,184,940	2,611,325,104
10.	Advance premium	1,699	0
11.	Dividends declared and unpaid:		
	11.1 Stockholders	0	0
	11.2 Policyholders	15,214,784	14,123,728
12.	Ceded reinsurance premiums payable (net of ceding commissions)	52,784,189	50,736,785
13.	Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 20)	2,069,009	1,870,040
14.	Amounts withheld or retained by company for account of others	22,225,245	26,244,566
15.	Remittances and items not allocated	15,179,673	10,518,862
16.	Provision for reinsurance (including $.....161,182 certified) (Schedule F, Part 3, Column 78)	11,949,382	12,075,083
17.	Net adjustments in assets and liabilities due to foreign exchange rates	61,397,019	53,701,577
18.	Drafts outstanding	0	0
19.	Payable to parent, subsidiaries and affiliates	19,747,621	28,490,834
20.	Derivatives	0	0
21.	Payable for securities	1,125,370	3,090,351
22.	Payable for securities lending	145,140,015	125,113,321
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	58,478,687	58,791,762
26.	Total liabilities excluding protected cell liabilities (Lines 1 through 25)	13,771,734,477	13,349,136,294
27.	Protected cell liabilities	0	0
28.	Total liabilities (Lines 26 and 27)	13,771,734,477	13,349,136,294
29.	Aggregate write-ins for special surplus funds	12,789,647	14,728,252
30.	Common capital stock	20,000,000	20,000,000
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	3,238,382,533	3,238,382,533
35.	Unassigned funds (surplus)	2,433,396,180	2,094,170,916
36.	Less treasury stock, at cost:		
	36.1 .....0.000 shares common (value included in Line 30 $.....0)	0	0
	36.2 .....0.000 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)	5,704,568,360	5,367,281,700
38.	TOTAL (Page 2, Line 28, Col. 3)	19,476,302,837	18,716,417,995

DETAILS OF WRITE-INS

2501.	Other liabilities	43,120,000	43,120,000
2502.	Investment real estate liability	27,078,565	29,787,305
2503.	Other liabilities	436,621	0
2598.	Summary of remaining write-ins for Line 25 from overflow page	(12,156,498)	(14,115,543)
2599.	Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)	58,478,687	58,791,762
2901.	Special surplus from retroactive reinsurance	12,789,647	14,728,252
2902.		0	0
2903.		0	0
2998.	Summary of remaining write-ins for Line 29 from overflow page	0	0
2999.	Totals (Lines 2901 through 2903 plus 2998) (Line 29 above)	12,789,647	14,728,252
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 through 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)	5,924,795,175	5,638,299,747
	DEDUCTIONS:		
2.	Losses incurred (Part 2, Line 35, Column 7)	3,490,140,238	3,280,429,641
3.	Loss adjustment expenses incurred (Part 3, Line 25, Column 1)	621,636,165	640,775,387
4.	Other underwriting expenses incurred (Part 3, Line 25, Column 2)	1,742,549,981	1,686,484,967
5.	Aggregate write-ins for underwriting deductions	0	0
6.	Total underwriting deductions (Lines 2 through 5)	5,854,326,384	5,607,689,995
7.	Net income of protected cells	0	0
8.	Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7)	70,468,791	30,609,752
	INVESTMENT INCOME		
9.	Net investment income earned (Exhibit of Net Investment Income, Line 17)	711,936,717	764,901,182
10.	Net realized capital gains (losses) less capital gains tax of $.....993,621 (Exhibit of Capital Gains (Losses))	(4,242,931)	41,177,563
11.	Net investment gain (loss) (Lines 9 + 10)	707,693,786	806,078,745
	OTHER INCOME		
12.	Net gain (loss) from agents' or premium balances charged off (amount recovered $.....2,098,757 amount charged off $.....14,764,251)	(12,665,495)	(9,853,407)
13.	Finance and service charges not included in premiums	20,058,454	18,906,454
14.	Aggregate write-ins for miscellaneous income	(1,454,336)	1,684,135
15.	Total other income (Lines 12 through 14)	5,938,623	10,737,182
16.	Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	784,101,200	847,425,678
17.	Dividends to policyholders	11,505,116	11,249,525
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)	772,596,084	836,176,153
19.	Federal and foreign income taxes incurred	128,089,019	124,020,760
20.	Net income (Line 18 minus Line 19) (to Line 22)	644,507,065	712,155,393
	CAPITAL AND SURPLUS ACCOUNT		
21.	Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2)	5,367,281,700	5,558,231,343
22.	Net income (from Line 20)	644,507,065	712,155,393
23.	Net transfers (to) from Protected Cell accounts	0	0
24.	Change in net unrealized capital gains or (losses) less capital gains tax of $.....(11,692,602)	(38,524,787)	(141,455,542)
25.	Change in net unrealized foreign exchange capital gain (loss)	(8,035,070)	32,873,368
26.	Change in net deferred income tax	15,414,818	(192,894,941)
27.	Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Column 3)	(21,201,067)	57,498,225
28.	Change in provision for reinsurance (Page 3, Line 16, Column 2 minus Column 1)	125,701	5,873,856
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	(255,000,000)	(665,000,000)
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	0
38.	Change in surplus as regards policyholders for the year (Lines 22 through 37)	337,286,659	(190,949,642)
39.	Surplus as regards policyholders, December 31 current year (Line 21 plus Line 38) (Page 3, Line 37)	5,704,568,360	5,367,281,700
	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 through 0503 plus 0598) (Line 5 above)	0	0
1401.	Profit and loss, miscellaneous	1,476,137	2,046,566
1402.	Other assets tri-party/tax credit bond income	43,282	44,544
1403.	Other expense	0	336
1498.	Summary of remaining write-ins for Line 14 from overflow page	(2,973,755)	(407,311)
1499.	Totals (Lines 1401 through 1403 plus 1498) (Line 14 above)	(1,454,336)	1,684,135
3701.		0	0
3702.		0	0
3703.		0	0
3798.	Summary of remaining write-ins for Line 37 from overflow page	0	0
3799.	Totals (Lines 3701 through 3703 plus 3798) (Line 37 above)	0	0

CASH FLOW

		1 Current Year	2 Prior Year
	CASH FROM OPERATIONS		
1.	Premiums collected net of reinsurance	5,990,697,347	5,662,970,415
2.	Net investment income	789,050,060	837,635,414
3.	Miscellaneous income	5,691,792	10,323,036
4.	Total (Lines 1 through 3)	6,785,439,200	6,510,928,865
5.	Benefit and loss related payments	3,213,235,506	3,003,366,764
6.	Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0
7.	Commissions, expenses paid and aggregate write-ins for deductions	2,329,270,094	2,294,005,939
8.	Dividends paid to policyholders	10,414,060	10,237,282
9.	Federal and foreign income taxes paid (recovered) net of $.....27,083,322 tax on capital gains (losses)	191,237,203	159,134,585
10.	Total (Lines 5 through 9)	5,744,156,862	5,466,744,571
11.	Net cash from operations (Line 4 minus Line 10)	1,041,282,338	1,044,184,294
	CASH FROM INVESTMENTS		
12.	Proceeds from investments sold, matured or repaid:		
	12.1 Bonds	1,564,531,393	1,840,685,034
	12.2 Stocks	107,975,185	415,747,452
	12.3 Mortgage loans	0	0
	12.4 Real estate	8,258,834	36,823,790
	12.5 Other invested assets	103,858,611	116,249,954
	12.6 Net gains or (losses) on cash, cash equivalents and short-term investments	(3,745)	169,139
	12.7 Miscellaneous proceeds	9,935,933	69,746,116
	12.8 Total investment proceeds (Lines 12.1 to 12.7)	1,794,556,210	2,479,421,484
13.	Cost of investments acquired (long-term only):		
	13.1 Bonds	2,407,731,816	2,575,810,147
	13.2 Stocks	98,533,070	132,828,156
	13.3 Mortgage loans	0	0
	13.4 Real estate	62,406,183	56,249,943
	13.5 Other invested assets	80,533,695	89,664,515
	13.6 Miscellaneous applications	21,991,675	606,501
	13.7 Total investments acquired (Lines 13.1 to 13.6)	2,671,196,439	2,855,159,262
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)	(876,640,229)	(375,737,778)
	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	255,000,000	665,000,000
	16.6 Other cash provided (applied)	9,651,758	(99,869,057)
17.	Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6)	(245,348,242)	(764,869,057)
	RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS		
18.	Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	(80,706,133)	(96,422,541)
19.	Cash, cash equivalents and short-term investments:		
	19.1 Beginning of year	586,319,816	682,742,357
	19.2 End of year (Line 18 plus Line 19.1)	505,613,683	586,319,816

Note: Supplemental disclosures of cash flow information for non-cash transactions:

20.0001	Exchange of bonds	37,500,613	16,964,880
20.0002	Stock distribution from limited partnership	11,530,935	1,297,303
20.0003	Income payment received in securities	1,938,058	1,915,943
20.0004	Other assets tri-party/tax credit bonds	93,825	93,407
20.0005	Exchange of stock	0	26,917,262
20.0006	Bonds exchanged for stock	0	489,553

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	151,007,242	65,823,853	69,835,201	146,995,894
2.	Allied lines	140,687,563	64,173,711	67,625,809	137,235,465
3.	Farmowners multiple peril	49,320,090	22,910,758	23,937,946	48,292,902
4.	Homeowners multiple peril	914,923,630	459,072,090	488,941,010	885,054,710
5.	Commercial multiple peril	805,671,624	351,079,710	364,498,864	792,252,469
6.	Mortgage guaranty	0	0	0	0
8.	Ocean marine	60,925,871	25,274,255	26,036,002	60,164,123
9.	Inland marine	178,086,565	79,960,446	83,638,718	174,408,292
10.	Financial guaranty	0	0	0	0
11.1	Medical professional liability - occurrence	0	(43)	(124)	82
11.2	Medical professional liability - claims-made	(912)	0	0	(912)
12.	Earthquake	23,850,589	13,734,208	13,600,915	23,983,882
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	963,741,336	362,900,393	348,433,330	978,208,399
17.1	Other liability - occurrence	526,993,300	209,506,667	222,434,767	514,065,200
17.2	Other liability - claims-made	143,080,377	79,359,306	81,984,885	140,454,798
17.3	Excess workers' compensation	3,730,422	1,518,865	1,157,806	4,091,481
18.1	Products liability - occurrence	53,992,997	23,337,193	23,042,414	54,287,775
18.2	Products liability - claims-made	6,471,998	2,868,157	2,898,288	6,441,868
19.1, 19.2	Private passenger auto liability	793,217,471	311,222,972	336,874,335	767,566,108
19.3, 19.4	Commercial auto liability	503,964,543	200,745,738	225,157,077	479,553,204
21.	Auto physical damage	644,580,303	254,415,794	275,429,622	623,566,475
22.	Aircraft (all perils)	(3,719)	0	0	(3,719)
23.	Fidelity	12,467,276	8,390,268	8,808,263	12,049,281
24.	Surety	8,167,245	708,100	459,713	8,415,632
26.	Burglary and theft	2,119,800	1,029,952	1,183,956	1,965,796
27.	Boiler and machinery	52,133,591	25,066,507	24,075,543	53,124,555
28.	Credit	223	1,150	1,214	159
29.	International	1,390,966	1,126	946	1,391,146
30.	Warranty	0	0	0	0
31.	Reinsurance - nonproportional assumed property	7,717,182	3,100,207	3,570,200	7,247,189
32.	Reinsurance - nonproportional assumed liability	3,408,546	2,234,868	2,120,623	3,522,790
33.	Reinsurance - nonproportional assumed financial lines	397,124	249,720	250,569	396,275
34.	Aggregate write-ins for other lines of business	63,855	0	0	63,855
35.	TOTALS	6,052,107,096	2,568,685,972	2,695,997,893	5,924,795,175

DETAILS OF WRITE-INS

3401.	Tribal workers' compensation	63,855	0	0	63,855
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 through 3403 plus 3498) (Line 34 above)	63,855	0	0	63,855

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1A - RECAPITULATION OF ALL PREMIUMS

	Line of Business	1 Amount Unearned (Running One Year or Less from Date of Policy) (a)	2 Amount Unearned (Running More Than One Year from Date of Policy) (a)	3 Earned But Unbilled Premium	4 Reserve for Rate Credits and Retrospective Adjustments Based on Experience	5 Total Reserve for Unearned Premiums Cols. 1 + 2 + 3 + 4
1.	Fire	68,865,384	984,100	(14,283)	0	69,835,201
2.	Allied lines	66,626,613	1,000,683	(1,487)	0	67,625,809
3.	Farmowners multiple peril	24,132,504	(194,558)	0	0	23,937,946
4.	Homeowners multiple peril	488,941,010	0	0	0	488,941,010
5.	Commercial multiple peril	368,848,622	(254,174)	(4,095,584)	0	364,498,864
6.	Mortgage guaranty	0	0	0	0	0
8.	Ocean marine	26,741,145	644,089	(1,349,233)	0	26,036,002
9.	Inland marine	72,335,926	11,754,063	(451,270)	0	83,638,718
10.	Financial guaranty	0	0	0	0	0
11.1	Medical professional liability - occurrence	(124)	0	0	0	(124)
11.2	Medical professional liability - claims-made	0	0	0	0	0
12.	Earthquake	13,205,757	395,158	0	0	13,600,915
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	386,412,954	(93,024)	(20,914,507)	(16,972,094)	348,433,330
17.1	Other liability - occurrence	231,018,054	(5,163,634)	(4,691,409)	1,271,756	222,434,767
17.2	Other liability - claims-made	64,718,515	17,272,128	(5,758)	0	81,984,885
17.3	Excess workers' compensation	1,158,549	0	(744)	0	1,157,806
18.1	Products liability - occurrence	23,316,837	345,163	(631,649)	12,064	23,042,414
18.2	Products liability - claims-made	2,953,923	(64,312)	8,676	0	2,898,288
19.1, 19.2	Private passenger auto liability	336,874,335	0	0	0	336,874,335
19.3, 19.4	Commercial auto liability	225,690,417	818,186	(6,979)	(1,344,546)	225,157,077
21.	Auto physical damage	275,318,025	111,597	0	0	275,429,622
22.	Aircraft (all perils)	0	0	0	0	0
23.	Fidelity	4,716,026	4,092,236	0	0	8,808,263
24.	Surety	121,089	338,624	0	0	459,713
26.	Burglary and theft	827,768	356,188	0	0	1,183,956
27.	Boiler and machinery	21,239,875	2,835,668	0	0	24,075,543
28.	Credit	1,214	0	0	0	1,214
29.	International	946	0	0	0	946
30.	Warranty	0	0	0	0	0
31.	Reinsurance - nonproportional assumed property	3,530,644	39,556	0	0	3,570,200
32.	Reinsurance - nonproportional assumed liability	2,071,439	49,184	0	0	2,120,623
33.	Reinsurance - nonproportional assumed financial lines	250,569	0	0	0	250,569
34.	Aggregate write-ins for other lines of business	0	0	0	0	0
35.	TOTALS	2,709,918,018	35,266,922	(32,154,227)	(17,032,820)	2,695,997,893
36.	Accrued retrospective premiums based on experience					17,032,820
37.	Earned but unbilled premiums					32,154,227
38.	Balance (sum of Lines 35 through 37)					2,745,184,940

DETAILS OF WRITE-INS

3401.		0	0	0	0	0
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 through 3403 plus 3498) (Line 34 above)	0	0	0	0	0

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

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1B - PREMIUMS WRITTEN

Line of Business	1 Direct Business (a)	Reinsurance Assumed 2 From Affiliates	Reinsurance Assumed 3 From Non-Affiliates	Reinsurance Ceded 4 To Affiliates	Reinsurance Ceded 5 To Non-Affiliates	6 Net Premiums Written (Cols. 1 + 2 + 3 - 4 - 5)
1. Fire	31,742,676	132,134,540	5,232	5,003,611	7,871,595	151,007,242
2. Allied lines	7,817,872	138,957,868	0	5,826,808	261,369	140,687,563
3. Farmowners multiple peril	0	49,320,090	0	0	0	49,320,090
4. Homeowners multiple peril	0	914,923,630	0	0	0	914,923,630
5. Commercial multiple peril	0	805,798,850	0	0	127,226	805,671,624
6. Mortgage guaranty	0	0	0	0	0	0
8. Ocean marine	7,494,863	54,430,297	6,229	629,347	376,171	60,925,871
9. Inland marine	21,550,470	172,091,721	0	15,183,631	371,995	178,086,565
10. Financial guaranty	0	0	0	0	0	0
11.1 Medical professional liability - occurrence	0	0	0	0	0	0
11.2 Medical professional liability - claims-made	0	(912)	0	0	0	(912)
12. Earthquake	367,080	23,557,984	0	63,804	10,671	23,850,589
13. Group accident and health	0	0	2,616	2,616	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	276,096	963,741,336	82,740	358,836	0	963,741,336
17.1 Other liability - occurrence	181,819,062	521,535,608	(278,820)	176,051,925	30,625	526,993,300
17.2 Other liability - claims-made	9,749,880	141,102,161	0	7,619,481	152,184	143,080,377
17.3 Excess workers' compensation	0	3,730,422	0	0	0	3,730,422
18.1 Products liability - occurrence	45,424,516	34,712,716	0	25,745,452	398,783	53,992,997
18.2 Products liability - claims-made	296,048	6,184,069	0	0	8,119	6,471,998
19.1, 19.2 Private passenger auto liability	0	793,217,471	0	0	0	793,217,471
19.3, 19.4 Commercial auto liability	97,050,575	488,801,539	817,808	82,443,647	261,732	503,964,543
21. Auto physical damage	28,003,595	641,474,217	386,097	25,246,991	36,614	644,580,303
22. Aircraft (all perils)	0	(3,719)	0	0	0	(3,719)
23. Fidelity	2,321,912	12,353,969	0	2,207,461	1,145	12,467,276
24. Surety	1,213,587	8,384,890	83,161	1,514,394	0	8,167,245
26. Burglary and theft	274,612	2,047,316	0	201,832	296	2,119,800
27. Boiler and machinery	1,449,330	50,774,804	0	49,294	41,248	52,133,591
28. Credit	0	223	900	900	0	223
29. International	0	1,391,621	1,811	2,466	0	1,390,966
30. Warranty	0	0	0	0	0	0
31. Reinsurance - nonproportional assumed property	XXX	7,716,291	(4,320)	(4,320)	(891)	7,717,182
32. Reinsurance - nonproportional assumed liability	XXX	3,408,546	8,448,947	8,448,947	0	3,408,546
33. Reinsurance - nonproportional assumed financial lines	XXX	397,124	845,265	845,265	0	397,124
34. Aggregate write-ins for other lines of business	0	63,855	0	0	0	63,855
35. TOTALS	436,852,172	5,972,248,526	10,397,666	357,442,387	9,948,881	6,052,107,096

DETAILS OF WRITE-INS

3401.	Tribal workers' compensation	0	63,855	0	0	0	63,855
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 through 3403 plus 3498) (Line 34 above)	0	63,855	0	0	0	63,855

(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 1 Direct Business	2 Reinsurance Assumed	3 Reinsurance Recovered	4 Net Payments (Cols. 1 + 2 - 3)	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.	Fire	23,755,676	103,472,082	5,081,367	122,146,391	93,880,575	110,728,728	105,298,238	71.6
2.	Allied lines	4,203,039	75,836,385	4,261,803	75,777,621	53,795,207	54,486,669	75,086,158	54.7
3.	Farmowners multiple peril	0	32,741,135	0	32,741,135	19,259,029	23,656,202	28,343,962	58.7
4.	Homeowners multiple peril	0	565,517,186	0	565,517,186	319,366,877	262,681,190	622,202,873	70.3
5.	Commercial multiple peril	(52,408)	402,131,850	(51,211)	402,130,654	670,008,557	652,354,006	419,785,204	53.0
6.	Mortgage guaranty	0	0	0	0	0	0	0	0.0
8.	Ocean marine	9,099,034	28,923,619	6,308,891	31,713,762	40,617,954	47,197,123	25,134,593	41.8
9.	Inland marine	9,737,101	80,537,020	5,486,167	84,787,954	57,867,193	61,394,783	81,260,364	46.6
10.	Financial guaranty	0	0	0	0	0	0	0	0.0
11.1	Medical professional liability - occurrence	57,189	14,177	57,189	14,177	1,628,332	1,186,249	456,260	558,458.4
11.2	Medical professional liability - claims-made	199,277	295,027	395,941	98,363	9,298,411	8,288,967	1,107,806	(121,434.0)
12.	Earthquake	(21,156)	0	0	(21,156)	1,971,327	271,600	1,678,571	7.0
13.	Group accident and health	0	11,051	11,051	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	62	62	0	0	0	0	0.0
16.	Workers' compensation	27,227,152	453,771,781	31,743,584	449,255,349	3,487,329,324	3,464,488,046	472,096,627	48.3
17.1	Other liability - occurrence	215,836,577	251,657,944	215,492,515	252,002,006	999,356,424	926,493,601	324,864,829	63.2
17.2	Other liability - claims-made	14,216,048	68,320,057	13,626,603	68,909,503	348,601,848	365,911,745	51,599,605	36.7
17.3	Excess workers' compensation	0	5,679,798	71,602	5,608,196	159,503,527	151,782,425	13,329,299	325.8
18.1	Products liability - occurrence	54,327,481	21,001,938	42,159,971	33,169,448	222,861,200	216,990,789	39,039,859	71.9
18.2	Products liability - claims-made	0	182,718	119,963	62,755	11,048,026	10,474,148	636,633	9.9
19.1, 19.2	Private passenger auto liability	0	435,754,162	0	435,754,162	599,501,691	576,421,293	458,834,559	59.8
19.3, 19.4	Commercial auto liability	61,967,970	259,087,930	46,732,952	274,322,948	634,566,125	553,643,043	355,246,031	74.1
21.	Auto physical damage	16,396,912	370,415,239	14,378,835	372,433,316	71,677,866	64,422,706	379,688,476	60.9
22.	Aircraft (all perils)	1,226,326	160,037	1,290,927	95,437	1,890,176	1,915,688	69,925	(1,880.4)
23.	Fidelity	1,421,013	2,932,087	1,415,505	2,937,595	11,824,919	12,507,317	2,255,198	18.7
24.	Surety	1,265,861	924,079	1,632,356	557,584	34,134,556	16,159,019	18,533,122	220.2
26.	Burglary and theft	13,871	279,595	0	293,466	1,720,318	1,525,623	488,161	24.8
27.	Boiler and machinery	644,279	14,688,945	0	15,333,224	13,577,080	13,157,400	15,752,904	29.7
28.	Credit	0	(7,112)	(5,700)	(1,413)	1,224,242	1,222,829	0	0.0
29.	International	0	34,562	11,863	22,699	2,873,701	1,752,686	1,143,714	82.2
30.	Warranty	0	0	0	0	0	0	0	0.0
31.	Reinsurance - nonproportional assumed property	XXX	1,513,070	27,164	1,485,906	10,485,861	12,537,343	(565,577)	(7.8)
32.	Reinsurance - nonproportional assumed liability	XXX	40,101,203	28,017,838	12,083,364	101,028,103	115,768,230	(2,656,762)	(75.4)
33.	Reinsurance - nonproportional assumed financial lines	XXX	0	0	0	2,364,318	3,158,457	(794,140)	(200.4)
34.	Aggregate write-ins for other lines of business	194,621	105,258	194,621	105,258	1,383,485	1,264,998	223,746	350.4
35.	TOTALS	441,715,862	3,216,082,885	418,461,859	3,239,336,888	7,984,646,252	7,733,842,902	3,490,140,238	58.9
	DETAILS OF WRITE-INS								
3401.	Tribal workers' compensation	194,621	105,258	194,621	105,258	1,383,485	1,264,998	223,746	350.4
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	XXX	
3499.	Totals (Lines 3401 through 3403 plus 3498) (Line 34 above)	194,621	105,258	194,621	105,258	1,383,485	1,264,998	223,746	350.4

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2A - UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

		Reported Losses				Incurred But Not Reported			8	9
		1	2	3	4	5	6	7		
	Line of Business	Direct	Reinsurance Assumed	Deduct Reinsurance Recoverable	Net Losses Excluding Incurred but not Reported (Cols. 1 + 2 - 3)	Direct	Reinsurance Assumed	Reinsurance Ceded	Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	Net Unpaid Loss Adjustment Expenses
1.	Fire	36,934,755	56,982,340	11,843,237	82,073,859	3,212,802	19,396,674	10,802,760	93,880,575	9,461,731
2.	Allied lines	371,166	43,508,272	488,041	43,391,398	1,430,542	12,257,719	3,284,452	53,795,207	8,947,789
3.	Farmowners multiple peril	0	13,232,443	0	13,232,443	0	6,047,065	20,479	19,259,029	4,187,694
4.	Homeowners multiple peril	0	153,511,730	0	153,511,730	0	165,913,668	58,522	319,366,877	52,768,893
5.	Commercial multiple peril	745,398	360,806,560	754,885	360,797,073	4,046,007	319,082,424	13,916,947	670,008,557	246,689,912
6.	Mortgage guaranty	0	0	0	0	0	0	0	0	0
8.	Ocean marine	11,750,473	23,894,623	11,169,004	24,476,092	28,789,252	15,458,953	28,106,343	40,617,954	13,315,097
9.	Inland marine	7,728,335	48,627,606	5,919,608	50,436,332	5,606,967	7,765,555	5,941,660	57,867,193	6,614,899
10.	Financial guaranty	0	0	0	0	0	0	0	0	0
11.1	Medical professional liability - occurrence	848,388	247,501	848,388	247,501	1,491,321	1,378,977	1,489,467	1,628,332	922,006
11.2	Medical professional liability - claims-made	10,919,942	17,541,657	22,812,883	5,648,716	3,221,789	6,703,639	6,275,733	9,298,411	1,680,526
12.	Earthquake	0	24,790	0	24,790	199,334	1,871,557	124,354	1,971,327	226,841
13.	Group accident and health	0	228,473	228,473	0	13,226	398,649	411,875	(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	519,895	519,895	0	119,537	2,231,792	2,351,329	(a) 0	0
16.	Workers' compensation	366,867,685	1,762,266,738	415,441,195	1,713,693,228	213,645,668	1,846,089,526	286,099,099	3,487,329,324	572,442,664
17.1	Other liability - occurrence	181,067,359	317,421,860	224,700,306	273,788,914	429,556,307	734,461,423	438,450,221	999,356,424	382,746,560
17.2	Other liability - claims-made	25,181,705	117,629,217	29,392,639	113,418,284	63,468,529	231,417,702	59,702,667	348,601,848	99,420,166
17.3	Excess workers' compensation	0	62,530,121	1,019,127	61,510,994	47,168,199	99,013,877	48,189,543	159,503,527	12,702,558
18.1	Products liability - occurrence	88,008,076	38,957,823	35,893,893	91,072,006	100,514,841	127,425,595	96,151,241	222,861,200	196,581,872
18.2	Products liability - claims-made	2,276,784	1,977,417	2,631,063	1,623,139	3,183,929	8,240,563	1,999,604	11,048,026	8,220,956
19.1, 19.2	Private passenger auto liability	0	312,151,229	0	312,151,229	3,411	287,350,462	3,411	599,501,691	109,528,243
19.3, 19.4	Commercial auto liability	90,142,880	302,042,996	74,512,021	317,673,855	87,757,942	313,102,826	83,968,497	634,566,125	85,276,892
21.	Auto physical damage	2,533,948	17,255,289	(4,219,467)	24,008,704	16,379,985	45,153,651	13,864,474	71,677,866	30,393,129
22.	Aircraft (all perils)	554,457	1,952,218	1,440,535	1,066,140	31,852,152	5,311,534	36,339,651	1,890,176	1,004,018
23.	Fidelity	361,272	959,289	381,021	939,539	3,953,740	11,422,018	4,490,379	11,824,919	3,243,085
24.	Surety	12,091,676	15,675,433	21,694,447	6,072,662	591,266	32,319,793	4,849,165	34,134,556	1,511,385
26.	Burglary and theft	0	667,736	3	667,733	200,248	1,044,114	191,777	1,720,318	442,797
27.	Boiler and machinery	328,623	8,400,448	62	8,729,009	(563,752)	5,872,534	460,711	13,577,080	2,405,816
28.	Credit	0	1,535,212	1,230,206	305,006	0	4,616,047	3,696,811	1,224,242	45,154
29.	International	0	1,590,327	639,216	951,111	0	4,169,330	2,246,740	2,873,701	192,950
30.	Warranty	0	0	0	0	0	0	0	0	0
31.	Reinsurance - nonproportional assumed property	XXX	18,014,920	11,320,204	6,694,716	XXX	9,605,452	5,814,307	10,485,861	970,107
32.	Reinsurance - nonproportional assumed liability	XXX	182,541,647	122,050,636	60,491,011	XXX	172,855,719	132,318,626	101,028,103	4,489,272
33.	Reinsurance - nonproportional assumed financial lines	XXX	3,261,761	2,665,931	595,831	XXX	8,781,653	7,013,167	2,364,318	186,996
34.	Aggregate write-ins for other lines of business	38,560	31,239	38,560	31,239	4,725,481	1,352,247	4,725,481	1,383,485	464,292
35.	TOTALS	838,751,482	3,885,988,811	995,416,010	3,729,324,282	1,050,568,723	4,508,112,738	1,303,359,491	7,984,646,252	1,857,084,301
	DETAILS OF WRITE-INS									
3401.	Tribal workers' compensation	38,560	31,239	38,560	31,239	4,725,481	1,352,247	4,725,481	1,383,485	464,292
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 through 3403 plus 3498) (Line 34 above)	38,560	31,239	38,560	31,239	4,725,481	1,352,247	4,725,481	1,383,485	464,292

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

UNDERWRITING AND INVESTMENT EXHIBIT

PART 3 - EXPENSES

	1 Loss Adjustment Expenses	2 Other Underwriting Expenses	3 Investment Expenses	4 Total
1. Claim adjustment services:				
1.1 Direct	42,762,954	0	0	42,762,954
1.2 Reinsurance assumed	295,638,719	0	0	295,638,719
1.3 Reinsurance ceded	32,155,292	0	0	32,155,292
1.4 Net claim adjustment services (1.1 + 1.2 - 1.3)	306,246,381	0	0	306,246,381
2. Commission and brokerage:				
2.1 Direct, excluding contingent	0	63,667,483	0	63,667,483
2.2 Reinsurance assumed, excluding contingent	0	793,430,315	0	793,430,315
2.3 Reinsurance ceded, excluding contingent	0	54,940,962	0	54,940,962
2.4 Contingent - direct	0	3,088,217	0	3,088,217
2.5 Contingent - reinsurance assumed	0	53,889,794	0	53,889,794
2.6 Contingent - reinsurance ceded	0	1,569,238	0	1,569,238
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	857,565,608	0	857,565,608
3. Allowances to manager and agents	0	663,380	0	663,380
4. Advertising	28,358	18,460,057	61	18,488,476
5. Boards, bureaus and associations	1,388,708	19,827,314	25,872	21,241,894
6. Surveys and underwriting reports	13,354	21,148,040	0	21,161,394
7. Audit of assureds' records	0	0	0	0
8. Salary and related items:				
8.1 Salaries	197,091,245	373,545,880	9,121,446	579,758,571
8.2 Payroll taxes	14,317,896	23,883,015	335,846	38,536,757
9. Employee relations and welfare	33,813,574	52,213,429	758,330	86,785,333
10. Insurance	23,249,178	3,910,759	8,853	27,168,790
11. Directors' fees	0	(185)	0	(185)
12. Travel and travel items	9,146,213	15,886,774	131,331	25,164,318
13. Rent and rent items	9,057,884	23,390,482	411,707	32,860,073
14. Equipment	1,663,767	8,558,809	1,570,350	11,792,926
15. Cost or depreciation of EDP equipment and software	3,699,550	84,009,169	221,343	87,930,062
16. Printing and stationery	394,852	1,614,982	20,023	2,029,857
17. Postage, telephone and telegraph, exchange and express	1,687,443	24,702,556	63,710	26,453,709
18. Legal and auditing	7,486,602	6,281,066	452,285	14,219,953
19. Totals (Lines 3 to 18)	303,038,624	678,095,527	13,121,157	994,255,308
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of $.....857,081	0	150,775,277	0	150,775,277
20.2 Insurance department licenses and fees	0	11,351,846	0	11,351,846
20.3 Gross guaranty association assessments	0	92,316	0	92,316
20.4 All other (excluding federal and foreign income and real estate)	0	3,206,712	0	3,206,712
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4)	0	165,426,152	0	165,426,152
21. Real estate expenses	0	0	69,790,103	69,790,103
22. Real estate taxes	0	0	1,125,027	1,125,027
23. Reimbursements by uninsured plans	0	0	0	0
24. Aggregate write-ins for miscellaneous expenses	12,351,160	41,462,694	1,359,952	55,173,806
25. Total expenses incurred	621,636,165	1,742,549,981	85,396,239	(a) 2,449,582,385
26. Less unpaid expenses - current year	1,857,084,301	421,808,032	4,325,720	2,283,218,053
27. Add unpaid expenses - prior year	1,828,248,006	415,814,952	4,541,002	2,248,603,960
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)	592,799,870	1,736,556,901	85,611,521	2,414,968,293

DETAILS OF WRITE-INS

2401. Miscellaneous expenses	15,604,970	91,553,767	1,359,952	108,518,690
2402. Service reimbursements	(2,047,339)	(20,327,951)	0	(22,375,289)
2403. Cost of computer software developed for internal use	(1,206,472)	(29,763,123)	0	(30,969,595)
2498. Summary of remaining write-ins for Line 24 from overflow page	0	0	0	0
2499. Totals (Lines 2401 through 2403 plus 2498) (Line 24 above)	12,351,160	41,462,694	1,359,952	55,173,806

(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) 25,305,582	24,882,704
1.1	Bonds exempt from U.S. tax	(a) 162,133,325	162,585,356
1.2	Other bonds (unaffiliated)	(a) 214,063,257	222,873,957
1.3	Bonds of affiliates	(a) 0	0
2.1	Preferred stocks (unaffiliated)	(b) 88,834	88,834
2.11	Preferred stocks of affiliates	(b) 0	0
2.2	Common stocks (unaffiliated)	3,508,256	3,458,189
2.21	Common stocks of affiliates	154,658,391	154,658,391
3.	Mortgage loans	(c) 0	0
4.	Real estate	(d) 148,480,815	148,480,815
5.	Contract loans	0	0
6.	Cash, cash equivalents and short-term investments	(e) 9,226,133	9,257,258
7.	Derivative instruments	(f) 0	0
8.	Other invested assets	105,573,390	105,573,390
9.	Aggregate write-ins for investment income	603,369	603,369
10.	Total gross investment income	823,641,352	832,462,263
11.	Investment expenses		(g) 85,396,239
12.	Investment taxes, licenses and fees, excluding federal income taxes		(g) 0
13.	Interest expense		(h) 16
14.	Depreciation on real estate and other invested assets		(i) 34,716,462
15.	Aggregate write-ins for deductions from investment income		412,829
16.	Total deductions (Lines 11 through 15)		120,525,546
17.	Net investment income (Line 10 minus Line 16)		711,936,717
	DETAILS OF WRITE-INS		
0901.	Securities lending income	601,944	601,944
0902.	Miscellaneous income	1,396	1,396
0903.	Property and wind plans	29	29
0998.	Summary of remaining write-ins for Line 9 from overflow page	0	0
0999.	Totals (Lines 0901 through 0903 plus 0998) (Line 9 above)	603,369	603,369
1501.	Management fees		412,829
1502.			0
1503.			0
1598.	Summary of remaining write-ins for Line 15 from overflow page		0
1599.	Totals (Lines 1501 through 1503 plus 1598) (Line 15 above)		412,829

(a) Includes $.....7,199,951 accrual of discount less $.....59,903,411 amortization of premium and less $.....9,365,381 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 $.....7,280,938 for company's occupancy of its own buildings; and excludes $.....0 interest on encumbrances.
(e) Includes $.....45,482 accrual of discount less $.....67,723 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 $.....34,716,462 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	0	0	0	1,117,440	0
1.1	Bonds exempt from U.S. tax	122,513	(63,466)	59,046	0	0
1.2	Other bonds (unaffiliated)	1,328,322	(498,015)	830,306	(45,514,997)	(128,210)
1.3	Bonds of affiliates	0	0	0	0	0
2.1	Preferred stocks (unaffiliated)	0	0	0	0	0
2.11	Preferred stocks of affiliates	0	0	0	0	0
2.2	Common stocks (unaffiliated)	3,420,585	(12,146,821)	(8,726,235)	(539,763)	0
2.21	Common stocks of affiliates	0	0	0	4,661,042	0
3.	Mortgage loans	0	0	0	0	0
4.	Real estate	2,919,454	0	2,919,454	0	0
5.	Contract loans	0	0	0	0	0
6.	Cash, cash equivalents and short-term investments	0	(7,277)	(7,277)	3,532	0
7.	Derivative instruments	0	0	0	0	0
8.	Other invested assets	5,562,379	(4,554,814)	1,007,564	(9,944,643)	(200,666)
9.	Aggregate write-ins for capital gains (losses)	0	667,831	667,831	0	(7,695,600)
10.	Total capital gains (losses)	13,353,252	(16,602,563)	(3,249,311)	(50,217,389)	(8,024,475)
	DETAILS OF WRITE-INS					
0901.	Foreign exchange	0	667,831	667,831	0	(7,695,600)
0902.		0	0	0	0	0
0903.		0	0	0	0	0
0998.	Summary of remaining write-ins for Line 9 from overflow page	0	0	0	0	0
0999.	Totals (Lines 0901 through 0903 plus 0998) (Line 9 above)	0	667,831	667,831	0	(7,695,600)

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	10,080,046	10,529,076	449,031
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)	36,484,228	40,890,329	4,406,101
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)	46,564,273	51,419,405	4,855,132
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	43,486,550	44,464,868	978,318
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due	6,640,227	6,503,185	(137,042)
15.3 Accrued retrospective premiums and contracts subject to redetermination	2,337,885	1,694,909	(642,976)
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	85,185,795	58,604,556	(26,581,239)
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	19,664,296	20,361,283	696,987
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	3,951,130	3,580,883	(370,247)
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25)	207,830,156	186,629,089	(21,201,067)
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0	0
28. TOTALS (Lines 26 and 27)	207,830,156	186,629,089	(21,201,067)

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 through 1103 plus 1198) (Line 11 above)	0	0	0
2501. Amounts receivable under high deductible policies	1,651,087	1,473,618	(177,469)
2502. Real estate operating fund	2,300,043	2,107,265	(192,778)
2503.	0	0	0
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above)	3,951,130	3,580,883	(370,247)

NOTES TO FINANCIAL STATEMENTS

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES AND GOING CONCERN

A. Accounting Practices:

St. Paul Fire and Marine Insurance Company (the Company) prepares its statutory financial statements in conformity with the 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 does not apply any statutory accounting practices that would be considered a permitted practice in its financial statements.

Net Income	SSAP #	F/S Page	F/S Line #	2018	2017
1. St. Paul Fire and Marine Insurance Company state basis	XXX	XXX	XXX	$ 644,507,065	$ 712,155,393
2. State Prescribed Practices that are an increase/(decrease) from NAIC SAP				—	—
3. State Permitted Practices that are an increase/(decrease) from NAIC SAP				—	—
4. NAIC SAP (1-2-3=4)	XXX	XXX	XXX	$ 644,507,065	$ 712,155,393
Surplus					
5. St. Paul Fire and Marine Insurance Company state basis	XXX	XXX	XXX	$ 5,704,568,360	$ 5,367,281,700
6. State Prescribed Practices that are an increase/(decrease) from NAIC SAP				—	—
7. State Permitted Practices that are an increase/(decrease) from NAIC SAP				—	—
8. NAIC SAP (5-6-7=8)	XXX	XXX	XXX	$ 5,704,568,360	$ 5,367,281,700

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. Gross deferred tax assets are reduced by a statutory valuation allowance adjustment if, based on the weight of available evidence, it is more likely than not that some portion or all of the gross deferred tax assets will not be realized.

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

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 generally are 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 fair value. Amortization is calculated using the constant yield method.

Common stocks of non-affiliates are stated at fair value based on fair values received from the Securities Valuation Office (SVO) or by a third party organization.

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

Real estate is stated at depreciated cost, net of encumbrances and specific impairments.

For a discussion of the valuation basis and adjustment methodology for loan-backed securities, see Note 5D.

Common stock investments in subsidiaries 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 or (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 or (losses).

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

Canadian dollar denominated assets, liabilities, revenues and expenses of the Company's Canadian Branch operations are included in the financial statements at the Canadian currency amounts. The net assets of the Canadian Branch operations are translated at the year-end exchange rate and the adjustment into U.S. dollars is reflected as a separate liability in the Company's balance sheet. The change in this account is charged or credited directly to unassigned funds.

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 change. Such changes in estimates could occur in a future period and may

NOTES TO FINANCIAL STATEMENTS

be material to the Company's net income in such period. For a discussion of loss and LAE reserving methodology 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.

D. Going Concern:

Not applicable.

2. ACCOUNTING CHANGES AND CORRECTIONS OF ERRORS

The Company had no material changes in accounting principles or material corrections of errors during 2018.

3. BUSINESS COMBINATIONS AND GOODWILL

Not applicable.

4. DISCONTINUED OPERATIONS

Not applicable.

5. INVESTMENTS

A. Mortgage Loans, including Mezzanine Real Estate 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. The following table provides aggregated information on structured securities classified on the basis used for the recognized 2018 other-than-temporary impairments:

	Amortized cost basis before other-than-temporary impairment	Other-than-temporary impairment recognized in loss	Fair value
OTTI recognized in the quarter ending March 31, 2018			
Intent to sell	$ —	$ —	$ —
Present value of cash flows is less than amortized cost	64,974	3,787	65,113
OTTI recognized in the quarter ending June 30, 2018			
Intent to sell	$ 38,349	$ 471	$ 37,878
Present value of cash flows is less than amortized cost	—	—	—
OTTI recognized in the quarter ending September 30, 2018			
Intent to sell	$ —	$ —	$ —
Present value of cash flows is less than amortized cost	175,871	6,494	161,015

NOTES TO FINANCIAL STATEMENTS

	Amortized cost basis before other-than-temporary impairment	Other-than-temporary impairment recognized in loss	Fair value
OTTI recognized in the quarter ending December 31, 2018			
Intent to sell	$ —	$ —	$ —
Present value of cash flows is less than amortized cost	—	—	—
Annual Aggregate Total		$ 10,752	

3. Loan-backed and structured securities with other-than-temporary impairments recognized in 2018 are as follows:

CUSIP	Amortized cost basis before other-than-temporary impairment	Present value of projected cash flows	Other-than-temporary impairment recognized in loss	Amortized cost basis after other-than-temporary impairment	Fair Value	Impairment Quarter
36185NM80	$ 64,974	$ 61,187	$ 3,787	$ 61,187	$ 65,113	Q1 - 2018
36228FCL8	38,349	37,878	471	37,878	37,878	Q2 - 2018
76111XDE0	25,639	21,682	3,957	21,682	25,681	Q3 - 2018
22541SCC0	150,232	147,695	2,537	147,695	135,334	Q3 - 2018
Total:			$ 10,752			

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 $ 3,734,298
      2. 12 Months or Longer $ 16,975,926

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

      1. Less than 12 Months $ 250,196,696
      2. 12 Months or Longer $ 621,206,278

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 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. Dollar 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.

2. Not applicable.

3. Not applicable.

4. Not applicable.

5. Collateral Reinvestment

   Aggregate Cash Collateral Reinvested

Securities Lending	Amortized Cost	Fair Value
30 Days or Less	$ 145,140,015	$ 145,140,015

6. Not applicable.

7. Not applicable.

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing:

Not applicable.

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing:

Not applicable.

H. Repurchase Agreements Transactions Accounted for as a Sale:

Not applicable.

NOTES TO FINANCIAL STATEMENTS

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale:

Not applicable.

J. Real Estate:

(1) On September 6, 2018, the Company sold property located at 11500 and 11300 Dr. Martin Luther King Jr. St., St. Petersburg, FL. The real estate was sold to Mid-Atlantic at Gateway, LLC. A gain of $2,765,393 was recognized on this sale.

(2) On November 21, 2018, the Company sold land located at 1520 Broadmoor Blvd., Buford, GA. The land was sold to the City of Buford, Georgia and a gain of $154,061 was recognized on this sale.

K. Low-Income Housing Tax Credits (LIHTC):

Not applicable.

L. Restricted Assets:

1. Restricted Assets (Including Pledged)

	Gross (Admitted & Nonadmitted) Restricted							Current Year			
	Current Year					6	7	8	9	Percentage	
Restricted Asset Category	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)	Total From Prior Year	Increase / (Decrease) (5 minus 6)	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	10 Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	11 Admitted Restricted to Total Admitted Assets (d)
a. Subject to contractual obligation for which liability is not shown	$ —	$ —	$ —	$ —	$ —	$ —	$ —	$ —	$ —	—%	—%
b. Collateral held under security lending agreements	145,140,015	—	—	—	145,140,015	125,113,321	20,026,694	—	145,140,015	0.7%	0.7%
c. Subject to repurchase agreements	—	—	—	—	—	—	—	—	—	—%	—%
d. Subject to reverse repurchase agreements	—	—	—	—	—	—	—	—	—	—%	—%
e. Subject to dollar repurchase agreements	—	—	—	—	—	—	—	—	—	—%	—%
f. Subject to dollar reverse repurchase agreements	—	—	—	—	—	—	—	—	—	—%	—%
g. Placed under option contracts	—	—	—	—	—	—	—	—	—	—%	—%
h. Letter stock or securities restricted as to sale - excluding FHLB capital stock	—	—	—	—	—	—	—	—	—	—%	—%
i. FHLB capital stock	—	—	—	—	—	—	—	—	—	—%	—%
j. On deposit with states	1,336,429,167	—	—	—	1,336,429,167	1,366,154,801	(29,725,634)	—	1,336,429,167	6.8%	6.9%
k. On deposit with other regulatory bodies	2,370,733	—	—	—	2,370,733	2,520,140	(149,407)	—	2,370,733	—%	—%
l. Pledged as collateral to FHLB (including assets backing funding agreements)	—	—	—	—	—	—	—	—	—	—%	—%
m. Pledged as collateral not captured in other categories	28,346,650	—	—	—	28,346,650	28,395,191	(48,541)	—	28,346,650	0.1%	0.1%
n. Other restricted assets	—	—	—	—	—	—	—	—	—	—%	—%
o. Total Restricted Assets	$ 1,512,286,565	$ —	$ —	$ —	$ 1,512,286,565	$ 1,522,183,453	$ (9,896,888)	$ —	$ 1,512,286,565	7.7%	7.8%

(a) Subset of Column 1
(b) Subset of Column 3
(c) Column 5 divided by Asset Page, Column 1, Line 28
(d) Column 9 divided by Asset Page, Column 3, Line 28

2. Details of Assets Pledged as Collateral Not Captured in Other Categories (Contracts that Share Similar Characteristics, Such as Reinsurance and Derivatives, Are Reported in Aggregate)

	Gross (Admitted & Nonadmitted) Restricted							8	Percentage	
	Current Year					6	7		9	10
Description of 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)	Total From Prior Year	Increase / (Decrease) (5 minus 6)	Total Current Year Admitted Restricted	Gross (Admitted & Nonadmitted) Restricted to Total Assets	Admitted Restricted to Total Admitted Assets
Bonds - Reinsurance	$ 27,015,654	$ —	$ —	$ —	$ 27,015,654	$ 27,037,057	$ (21,403)	$ 27,015,654	0.1%	0.1%
Bonds - Letter of Credit	1,330,996	—	—	—	1,330,996	1,358,134	(27,138)	1,330,996	—%	—%
Total (c)	$ 28,346,650	$ —	$ —	$ —	$ 28,346,650	$ 28,395,191	$ (48,541)	$ 28,346,650	0.1%	0.1%

(a) Subset of Column 1

(b) Subset of Column 3

(c) Total line for columns 1 through 7 should equal 5L(1)m columns 1 through 7 respectively and total line for columns 8 through 10 should equal 5L(1)m columns 9 through 11 respectively

3. Not applicable.

NOTES TO FINANCIAL STATEMENTS

4. Collateral Received and Reflected as Assets Within the Reporting Entity's Financial Statements

Collateral Assets	1 Book/Adjusted Carrying Value (BACV)	2 Fair Value	3 % of BACV to Total Assets (Admitted and Nonadmitted) *	4 % of BACV to Total Admitted Assets **
a. Cash, Cash Equivalents, and Short-Term Investments	$ 145,140,015	$ 145,140,015	0.7%	0.7%
b. Schedule D, Part 1	—	—	—%	—%
c. Schedule D, Part 2, Section 1	—	—	—%	—%
d. Schedule D, Part 2, Section 2	—	—	—%	—%
e. Schedule B	—	—	—%	—%
f. Schedule A	—	—	—%	—%
g. Schedule BA, Part 1	—	—	—%	—%
h. Schedule DL, Part 1	—	—	—%	—%
i. Other	—	—	—%	—%
j. Total Collateral Assets	$ 145,140,015	$ 145,140,015	0.7%	0.7%

* Column 1 divided by Asset Page, Line 26 (Column 1)

** Column 1 divided by Asset Page, Line 26 (Column 3)

	1 Amount	2 % of Liability to Total Liabilities *
k. Recognized Obligation to Return Collateral Asset	$ 145,140,015	1.1%

* Column 1 divided by Liability Page, Line 26 (Column 1)

M. Working Capital Finance Investments:

Not applicable.

N. Offsetting and Netting of Assets and Liabilities:

Not applicable.

O. Structured Notes:

Not applicable.

P. 5GI Securities:

Investment	Number of 5GI Securities		Aggregate BACV		Aggregate Fair Value	
	Current Year	Prior Year	Current Year	Prior Year	Current Year	Prior Year
(1) Bonds - AC	3	2	$ 6,296,819	$ 25,570	$ 7,961,534	$ 1,736,262
(2) Bonds - FV	1	—	9,678,400	—	9,678,400	—
(3) LB&SS - AC	—	—	—	—	—	—
(4) LB&SS - FV	—	—	—	—	—	—
(5) Preferred Stock - AC	—	—	—	—	—	—
(6) Preferred Stock - FV	—	—	—	—	—	—
(7) Total	4	2	$ 15,975,219	$ 25,570	$ 17,639,934	$ 1,736,262

AC - Amortized Cost FV - Fair Value

Q. Short Sales:

Not applicable.

R. Prepayment Penalty and Acceleration Fees:

	General Account	Protected Cell
1. Number of CUSIPs	61	—
2. Aggregate Amount of Investment Income	$ 3,513,863	$ —

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 $4,554,814 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.

NOTES TO FINANCIAL STATEMENTS

7. INVESTMENT INCOME

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

B. At December 31, 2018, the Company had no accrued investment income over 90 days past due.

8. DERIVATIVE INSTRUMENTS

Not applicable.

9. INCOME TAXES

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

	December 31, 2018		
	Ordinary	Capital	Total
1. a. Gross deferred tax assets	$ 307,794,518	$ 100,237,666	$ 408,032,184
b. Statutory valuation allowance adjustment	—	—	—
c. Adjusted gross deferred tax assets	307,794,518	100,237,666	408,032,184
d. Deferred tax assets nonadmitted	34,567,031	50,618,764	85,185,795
e. Subtotal net admitted deferred tax assets	273,227,487	49,618,902	322,846,389
f. Deferred tax liabilities	64,228,283	45,062,941	109,291,224
g. Net admitted deferred tax asset/(liability)	$ 208,999,204	$ 4,555,961	$ 213,555,165

	December 31, 2017		
	Ordinary	Capital	Total
a. Gross deferred tax assets	$ 398,393,742	$ 107,463,621	$ 505,857,363
b. Statutory valuation allowance adjustment	—	—	—
c. Adjusted gross deferred tax assets	398,393,742	107,463,621	505,857,363
d. Deferred tax assets nonadmitted	—	58,604,556	58,604,556
e. Subtotal net admitted deferred tax assets	398,393,742	48,859,065	447,252,807
f. Deferred tax liabilities	186,084,158	48,139,665	234,223,823
g. Net admitted deferred tax asset/(liability)	$ 212,309,584	$ 719,400	$ 213,028,984

	Change		
	Ordinary	Capital	Total
a. Gross deferred tax assets	$ (90,599,224)	$ (7,225,955)	$ (97,825,179)
b. Statutory valuation allowance adjustment	—	—	—
c. Adjusted gross deferred tax assets	(90,599,224)	(7,225,955)	(97,825,179)
d. Deferred tax assets nonadmitted	34,567,031	(7,985,792)	26,581,239
e. Subtotal net admitted deferred tax assets	(125,166,255)	759,837	(124,406,418)
f. Deferred tax liabilities	(121,855,875)	(3,076,724)	(124,932,599)
g. Net admitted deferred tax asset/(liability)	$ (3,310,380)	$ 3,836,561	$ 526,181

2. Admission Calculation Components SSAP No. 101:

	December 31, 2018		
	Ordinary	Capital	Total
a. Federal income taxes paid in prior years recoverable through loss carrybacks.	$ 108,530,295	$ 4,555,961	$ 113,086,256
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)	100,468,909	—	100,468,909
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date.	100,468,909	—	100,468,909
2. Adjusted gross deferred tax assets allowed per limitation threshold.	xxxx	xxxx	823,648,843

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.	64,228,283	45,062,941	109,291,224
d. Deferred tax assets admitted as the result of application of SSAP No. 101. Total (2(a) + 2(b) + 2(c))	273,227,487	49,618,902	322,846,389
Deferred tax liabilities netted against deferred tax assets	64,228,283	45,062,941	109,291,224
Total	$ 208,999,204	$ 4,555,961	$ 213,555,165

December 31, 2017

	Ordinary	Capital	Total
a. Federal income taxes paid in prior years recoverable through loss carrybacks.	$ 230,080,154	$ 719,400	$ 230,799,554
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)	30,504,289	—	30,504,289
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date.	30,504,289	—	30,504,289
2. Adjusted gross deferred tax assets allowed per limitation threshold.	xxxx	xxxx	773,137,907
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.	137,809,299	48,139,665	185,948,964
d. Deferred tax assets admitted as the result of application of SSAP No. 101. Total (2(a) + 2(b) + 2(c))	398,393,742	48,859,065	447,252,807
Deferred tax liabilities netted against deferred tax assets	186,084,158	48,139,665	234,223,823
Total	$ 212,309,584	$ 719,400	$ 213,028,984

Change

	Ordinary	Capital	Total
a. Federal income taxes paid in prior years recoverable through loss carrybacks.	$ (121,549,859)	$ 3,836,561	$ (117,713,298)
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)	69,964,620	—	69,964,620
1. Adjusted gross deferred tax assets expected to be realized following the balance sheet date.	69,964,620	—	69,964,620
2. Adjusted gross deferred tax assets allowed per limitation threshold.	xxxx	xxxx	50,510,936
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.	(73,581,016)	(3,076,724)	(76,657,740)
d. Deferred tax assets admitted as the result of application of SSAP No. 101. Total (2(a) + 2(b) + 2(c))	(125,166,255)	759,837	(124,406,418)
Deferred tax liabilities netted against deferred tax assets	(121,855,875)	(3,076,724)	(124,932,599)
Total	$ (3,310,380)	$ 3,836,561	$ 526,181

	2018	2017
3. a. Ratio percentage used to determine recovery period and threshold limitation amount.	453%	447%
b. Amount of adjusted capital and surplus used to determine recovery period and threshold limitation in 2(b)2 above.	$ 5,490,992,288	$ 5,154,252,716

NOTES TO FINANCIAL STATEMENTS

4. Impact of Tax-Planning Strategies:

	December 31, 2018	
	Ordinary	Capital
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).	$ 307,794,518	$ 100,237,666
2. Percentage of adjusted gross deferred tax assets by tax character attributable to the impact of tax-planning strategies.	—%	—%
3. Net admitted adjusted gross deferred tax assets amounts from Note 9A1(e).	$ 273,227,487	$ 49,618,902
4. Percentage of net admitted adjusted gross deferred tax assets by tax character attributable to the impact of tax-planning strategies.	—%	—%

	December 31, 2017	
	Ordinary	Capital
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).	$ 398,393,742	$ 107,463,621
2. Percentage of adjusted gross deferred tax assets by tax character attributable to the impact of tax-planning strategies.	—%	—%
3. Net admitted adjusted gross deferred tax assets amounts from Note 9A1(e).	$ 398,393,742	$ 48,859,065
4. Percentage of net admitted adjusted gross deferred tax assets by tax character attributable to the impact of tax-planning strategies.	—%	—%

	Change	
	Ordinary	Capital
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).	$ (90,599,224)	$ (7,225,955)
2. Percentage of adjusted gross deferred tax assets by tax character attributable to the impact of tax-planning strategies.	—%	—%
3. Net admitted adjusted gross deferred tax assets amounts from Note 9A1(e).	$ (125,166,255)	$ 759,837
4. Percentage of net admitted adjusted gross deferred tax assets by tax character attributable to the impact of tax-planning strategies.	—%	—%

b. Does the Company's tax-planning strategies include the use of reinsurance? Yes _____ No X

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

Not applicable.

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

	December 31, 2018	December 31, 2017	Change
1. Current Income Tax:			
Federal	$ 86,078,703	$ 123,146,281	$ (37,067,578)
Foreign	42,010,316	874,480	41,135,836
Subtotal	128,089,019	124,020,761	4,068,258
Federal income taxes on net capital gains	993,621	66,419,146	(65,425,525)
Federal and foreign income taxes incurred	$ 129,082,640	$ 190,439,907	$ (61,357,267)

NOTES TO FINANCIAL STATEMENTS

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

	December 31, 2018	December 31, 2017	Change
Ordinary:			
Discounting of unpaid losses	$ 137,797,069	$ 228,919,469	$ (91,122,400)
Unearned premium reserve	115,297,840	109,675,655	5,622,185
Nonadmitted assets	19,509,004	20,398,176	(889,172)
Other	35,190,605	39,400,442	(4,209,837)
Total ordinary deferred tax assets	$ 307,794,518	$ 398,393,742	$ (90,599,224)
Statutory valuation allowance adjustment	—	—	—
Nonadmitted deferred tax assets	34,567,031	—	34,567,031
Admitted ordinary deferred tax assets	$ 273,227,487	$ 398,393,742	$ (125,166,255)
Capital:			
Investments	$ 100,237,666	$ 107,463,621	$ (7,225,955)
Total capital deferred tax assets	$ 100,237,666	$ 107,463,621	$ (7,225,955)
Statutory valuation allowance adjustment	—	—	—
Nonadmitted deferred tax assets	50,618,764	58,604,556	(7,985,792)
Admitted capital deferred tax assets	$ 49,618,902	$ 48,859,065	$ 759,837
Total admitted deferred tax assets	$ 322,846,389	$ 447,252,807	$ (124,406,418)

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

	December 31, 2018	December 31, 2017	Change
Ordinary:			
Investments	$ 18,856,762	$ 38,726,163	$ (19,869,401)
Loss and LAE reserve discounting (transition rule)	38,265,209	138,379,189	(100,113,980)
Foreign tax credit redetermination	3,354,689	5,421,332	(2,066,643)
Other	3,751,623	3,557,474	194,149
Total ordinary deferred tax liabilities	$ 64,228,283	$ 186,084,158	$ (121,855,875)
Capital:			
Investments	$ 45,062,941	$ 48,139,665	$ (3,076,724)
Total capital deferred tax liabilities	$ 45,062,941	$ 48,139,665	$ (3,076,724)
Total deferred tax liabilities	$ 109,291,224	$ 234,223,823	$ (124,932,599)
4. Net admitted deferred tax asset/(liability)	$ 213,555,165	$ 213,028,984	$ 526,181

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. During the fourth quarter of 2017, the Company recorded provisional amounts for the tax imposed on accumulated foreign earnings and partnership investments, as well as the amount due under the transition rule relating to the change in discounting of incurred losses, based on information available at December 31, 2017. In 2018, the Company made minor adjustments to the provisional amounts for taxes related to accumulated foreign earnings based upon final earnings from its foreign operations and the proposed regulations issued by the U.S. Treasury. These minor adjustments were consistent with final regulations issued by the U.S. Treasury in January 2019. The Company also made minor adjustments to the provisional amount for taxes related to partnership investments based upon the latest available information associated with those investments (Form K-1's) that were received in 2018.

   In November 2018, the U.S. Treasury issued proposed regulations which would establish the interest rate and discounting methodology to be used in determining the tax discount on loss and loss adjustment reserves under the Tax Cuts and Jobs Act of 2017. The proposed regulations significantly reduce the gross deferred tax assets and liabilities related to the transition rule for discounting of reserves and reduced the estimated additional tax payments associated with the transition rule over the eight years beginning in 2018 as discussed above.

   The Company estimated the amounts payable related to the transition rules for discounting of loss reserves using the regulations proposed by the U.S. Treasury during 2018. These amounts are subject to change once the final regulations are issued, which is expected to occur in 2019.

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:

	December 31, 2018	December 31, 2017	Change
Total deferred tax assets	$ 408,032,184	$ 505,857,363	$ (97,825,179)
Total deferred tax liabilities	109,291,224	234,223,823	(124,932,599)
Net deferred tax asset/(liability)	$ 298,740,960	$ 271,633,540	27,107,420
Tax effect of unrealized gains (losses)			(11,692,602)
Change in net deferred income tax			$ 15,414,818

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:

	December 31, 2018
Pretax net income (loss)	$ 773,589,705
Taxes at statutory rate	162,453,838
Increase (decrease) attributable to:	
Nontaxable investment income	(58,894,518)
Foreign exchange	9,769,881
Other	338,621
	$ 113,667,822
Federal and foreign taxes incurred	$ 129,082,640
Change in net deferred taxes	(15,414,818)
Total statutory income tax	$ 113,667,822
Effective tax rate	14.7%

E. 1. The Company has no net operating loss carry-forward available for tax purposes.

2. Current and prior year federal income taxes available for recoupment in the event of future net losses are as follows:

2018 Total	$ 109,341,442
2017 Total	176,323,367
2016 Capital Gains	29,290,384

3. The Company has no protective tax deposits with the Internal Revenue Service (IRS) under Section 6603 of the IRS 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 IRS 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. For 2017, the consolidated group is not in an AMT position. For 2018 and forward, the Tax Cuts and Jobs Act of 2017 repealed the AMT.

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.

H. Repatriation Transition Tax (RTT):

The estimated RTT owed under the Tax Cuts and Jobs Act of 2017 is $2,479,985. The estimated RTT has been fully remitted to the IRS. There are no future payments due.

I. The Company does not have an AMT credit.

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

A-C. 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.

NOTES TO FINANCIAL STATEMENTS

(2) TRV maintains a private short-term investment pool, known as the Travelers Money Market Liquidity Pool (TRVMMLP), in which affiliated companies may participate. The TRVMMLP is managed by Indemnity. Each company may convert its position in the TRVMMLP into cash at any time and may also use its position in the TRVMMLP to settle transactions with other affiliated participants in the TRVMMLP. The position of each company in the TRVMMLP is calculated and adjusted daily. Each participating insurance company carries its share of the TRVMMLP as a short-term investment in Schedule DA. At December 31, 2018 and 2017, the TRVMMLP totaled $4.14 billion and $5.20 billion, respectively.

D. (1) At December 31, 2018 and 2017, the Company had $19,747,621 and $28,490,834 payable to 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:

	December 31, 2018	December 31, 2017
Uncollected premiums and agents' balances in course of collection	$ 328,951,252	$ 334,491,536
Amounts recoverable from reinsurers	42,021,047	44,887,877
Reinsurance payable on paid losses and LAE	353,174,445	329,805,200

These balances were settled net through the intercompany settlement process during January 2019 and January 2018, respectively.

E. The Company is party to various guarantees with affiliates. See Note 14G for additional detail.

F. Material management or service contracts and cost sharing arrangements, involving the Company or any affiliate, other than cost allocation arrangements, are as follows:

Type of Contract and Description	Servicing Company	Other Party
Amended and Restated Expense Allocation	The Travelers Indemnity Company	Travelers P&C[1]
Reinsurance Allocation	The Travelers Indemnity Company	Travelers P&C[1]
Amended and Restated Shared Services and Reimbursement Agreement	Travelers Insurance Company of Canada and The Dominion of Canada General Insurance Company	St. Paul Fire and Marine Insurance Company (Canadian Branch)

[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 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. 1. The Company directly owns Northbrook Holdings, Inc. (Northbrook), a downstream noninsurance holding company. Northbrook directly owns Discover Property & Casualty Insurance Company (DPCIC), a Connecticut domiciled insurance company, and St. Paul Protective Insurance Company (SPPIC), a Connecticut domiciled insurer.

2. The carrying value of the Company's investment in Northbrook was $281,174,770 at December 31, 2018.

3. The Company has not obtained an audit of Northbrook's financial statements.

4. The Company has limited the carrying value of its investment in Northbrook to the value contained in the statutory audited financial statements of DPCIC and SPPIC, including any adjustments required by SSAP No. 97, *Investments in Subsidiary, Controlled and Affiliated Entities*.

5. Northbrook does not have any material assets other than the ownership of its insurance subsidiaries. Northbrook does not have any material direct liabilities, commitments, contingencies, guarantees or obligations that are required to be reported.

M. The tables below provide information on subsidiary, controlled and affiliated (SCA) investments, excluding investments in U.S. insurance SCA entities.

1. Balance sheet value (admitted and nonadmitted) all SCAs (except 8bi entities):

SCA Entity	Percentage of SCA Ownership	12/31/2018 Gross Amount	12/31/2018 Admitted Amount	12/31/2018 Nonadmitted Amount
a. SSAP No. 97 8a Entities				
Total SSAP No. 97 8a Entities	XXX	$ —	$ —	$ —
b. SSAP No. 97 8b(ii) Entities				
Total SSAP No. 97 8b(ii) Entities	XXX	$ —	$ —	$ —

NOTES TO FINANCIAL STATEMENTS

SCA Entity	Percentage of SCA Ownership	12/31/2018 Gross Amount	12/31/2018 Admitted Amount	12/31/2018 Nonadmitted Amount
c. SSAP No. 97 8b(iii) Entities				
8527512 Canada Inc.	22.48%	$ 147,813,946	$ 147,813,946	$ —
Northbrook Holdings, Inc.	100.00%	281,174,770	281,174,770	—
MMI Capital Trust I	100.00%	3,852,121	—	3,852,121
USF&G Capital I	100.00%	3,093,000	—	3,093,000
USF&G Capital III	100.00%	3,093,000	—	3,093,000
English Turn Realty Management, Inc.	100.00%	40,925	—	40,925
Yonkers Financial Corp.	100.00%	1,000	—	1,000
English Turn Fidelity Realty, Inc.	100.00%	—	—	—
Travelers Special Services Limited	100.00%	—	—	—
Total SSAP No. 97 8b(iii) Entities	XXX	$ 439,068,762	$ 428,988,716	$ 10,080,046
d. SSAP No. 97 8b(iv) Entities				
Total SSAP No. 97 8b(iv) Entities	XXX	$ —	$ —	$ —
e. Total SSAP No. 97 8b Entities (except 8b(i) entities)	XXX	$ 439,068,762	$ 428,988,716	$ 10,080,046
f. Aggregate Total	XXX	$ 439,068,762	$ 428,988,716	$ 10,080,046

2. NAIC filing response information:

SCA Entity	Type of NAIC Filing	Date of Filing to the NAIC	12/31/2017 NAIC Valuation Amount	NAIC Response Received Y/N	NAIC Disallowed Entities Valuation Method, Resubmission Required Y/N	Code
a. SSAP No. 97 8a Entities						
Total SSAP No. 97 8a Entities	XXX	XXX	$ —	XXX	XXX	XXX
b. SSAP No. 97 8b(ii) Entities						
Total SSAP No. 97 8b(ii) Entities	XXX	XXX	$ —	XXX	XXX	XXX
c. SSAP No. 97 8b(iii) Entities						
8527512 Canada Inc.	S2	6/19/2018	$ 143,321,525	Y	N	
Northbrook Holdings, Inc.	S2	5/3/2018	278,017,371	Y	N	
MMI Capital Trust I						
USF&G Capital I						
USF&G Capital III						
English Turn Realty Management, Inc.						
Yonkers Financial Corp.						
English Turn Fidelity Realty, Inc.						
Travelers Special Services Limited						
Total SSAP No. 97 8b(iii) Entities	XXX	XXX	$ 421,338,896	XXX	XXX	XXX
d. SSAP No. 97 8b(iv) Entities						
Total SSAP No. 97 8b(iv) Entities	XXX	XXX	$ —	XXX	XXX	XXX
e. Total SSAP No. 97 8b Entities (except 8b(i) entities)	XXX	XXX	$ 421,338,896	XXX	XXX	XXX
f. Aggregate Total	XXX	XXX	$ 421,338,896	XXX	XXX	XXX

For additional information on downstream holding companies valued utilizing the look-through approach, see Part L above.

N. Not applicable.

O. SCA Loss Tracking:

The Company had no SCA investments with material cumulative losses in excess of the Company's investment in the SCA.

11. DEBT

Not applicable.

NOTES TO FINANCIAL STATEMENTS

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 the Company and its property-casualty affiliates. In addition the Company participates in nonqualified defined benefit pension plans sponsored by TRV which cover certain highly-compensated employees of the Company and its property-casualty affiliates. 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 $19,493,377 and $20,826,580 for 2018 and 2017, respectively.

2. Postretirement Benefit Plan:

The Company participates in a postretirement health and life insurance benefit plan sponsored by TRV for employees of the Company and its property-casualty affiliates 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 $549,773 and $573,780 for 2018 and 2017, respectively.

3. 401(k) Savings Plan:

The Company participates in a 401(k) savings plan sponsored by TRV for substantially all employees of the Company and its property-casualty affiliates. 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 $25,303,052 and $25,405,942 for 2018 and 2017, 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 200,000 shares of common capital stock authorized, issued and outstanding with a par value of $100 per share.

The Company paid ordinary dividends of $255 million and $665 million to its parent company, TRV, in 2018 and 2017, respectively.

Dividends to the shareholder and the proportion of the profits of the Company that may be paid to the shareholder is not limited by charter. The maximum amount of dividends which can be paid by the Company to the shareholder 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 dividends to the shareholder that can be made during 2019 without prior approval is $644,507,065.

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 2018. See Note 23F for additional detail.

Unassigned funds have been increased by cumulative net unrealized gains of $892,947,460.

14. LIABILITIES, CONTINGENCIES AND ASSESSMENTS

A. Contingent Commitments:

At December 31, 2018, the Company had commitments to fund investments of $226.4 million.

B. Assessments:

1. The Company has accrued liabilities of $53.8 million for guaranty fund and other insurance-related assessments and related recoverables of $808 thousand at December 31, 2018. 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.

NOTES TO FINANCIAL STATEMENTS

2. a. Assets recognized from paid and accrued premium tax offsets December 31, 2017	$	7,473
b. Decreases current year:		
Premium tax offset charged off		—
Premium tax offset applied		(83,435)
Premium tax offset refund		5,315
c. Increases current year:		
Premium tax offset accrued		(70,972)
d. Assets recognized from paid and accrued premium tax offsets December 31, 2018	$	14,621

3. Not applicable.

C. Gain Contingencies:

Not applicable.

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	$18,650

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

0-25 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.

G. All Other Contingencies:

1. a. In the ordinary course of selling businesses to third parties, the Company has agreed to indemnify purchasers for losses arising out of breaches of representations and warranties with respect to the business being sold, covenants and obligations of the Company and, in certain cases, obligations arising from certain liabilities and the imposition of additional taxes due to either a change in the tax law or an adverse interpretation of the tax law. Such indemnification provisions generally are applicable from the closing date to the expiration of the relevant statutes of limitations, although, in some cases, there may be agreed upon term limitations or no term limitations. Certain of these contingent obligations are subject to deductibles which have to be incurred by the obligee before the Company is obligated to make payments.

b. The Company has a contingent obligation for a guarantee related to certain insurance policy obligations of a former insurance subsidiary. The maximum amount of the Company's obligation related to the guarantee was $480 million at December 31, 2018, all of which is indemnified by a third party.

c. The Company has an interest in an unaffiliated real estate joint venture. Effective October 21, 2011 through August 12, 2014, the real estate joint venture assumed a mortgage secured by property it owns. The Company entered into a separate payment guarantee with the lender for the mortgage and provided several indemnifications, including indemnifications for environmental liabilities should the lender be held responsible. The maximum principal for the mortgage is $45 million and is secured by the property. The other indemnifications for the mortgage, including an environmental guarantee, are not limited. The Company, along with a third party joint venture investor, were joint and severally liable for these indemnities and guarantees. Concurrent with assuming the mortgage, the Company entered into a contribution agreement with the third party joint venture investor to allow the Company to recover its share of the indemnities and guarantees, if required. On August 12, 2014, the Company sold all but 1% of its invested interest in the real estate joint venture to an outside party and the respective guarantees and contribution agreement were terminated prospectively. As part of the sale, the outside party replaced the Company as guarantor with the lender. The Company entered into a separate contribution agreement with the outside party for reimbursement based on their respective equity ownership in the Joint Venture.

d. In a guaranty agreement dated August 31, 2000, the Company guarantees the timely payment of all obligations of St. Paul (Bermuda) Ltd., with respect to policies of insurance issued to clients of Marsh USA Inc. up to a maximum of $50 million. On July 1, 2010, St. Paul (Bermuda) Ltd., St. Paul Re (Bermuda) Ltd. and Travelers (Bermuda) Limited were amalgamated into one Bermuda company under the name Travelers (Bermuda) Limited. The guarantee was amended on June 30, 2010 to limit the Company's guarantee to only those obligations of St. Paul (Bermuda) Ltd. that existed prior to the amalgamation. The Company also waived certain rights in the amended guarantee until all creditors of St. Paul Re (Bermuda) Ltd and Travelers (Bermuda) Limited at the time of the amalgamation have been paid in full.

e. In a guaranty agreement dated July 1, 2000, the Company guarantees the payment of United States Fidelity and Guaranty Company's (USF&G) obligations under insurance and reinsurance contracts issued by USF&G on or after the date of the agreement. The Company may terminate this guaranty at any time upon 90 days prior notice or other specified circumstances.

NOTES TO FINANCIAL STATEMENTS

f. Effective September 30, 1997, the Company entered into an unconditional guaranty that Travelers Constitution State Insurance Company, a wholly-owned subsidiary, would maintain required capital and surplus, each in the amount of $2.5 million, as a condition of becoming licensed in the State of Maine.

g. Effective May 15, 1996, the Company provided a guaranty of the performance by its wholly-owned subsidiary, Seaboard Surety Company (Seaboard), of all Seaboard's financial obligations arising out of its insurance or reinsurance contracts. The guaranty may be amended at any time upon three months' prior notice. On January 2, 2009, Seaboard was merged into Travelers Casualty and Surety Company of America. The terms of the guarantee remain in effect.

h. Effective December 10, 1993, the Company has guaranteed the performance by Travelers Insurance Company Limited (Travelers Limited), an affiliate incorporated in England, of all Travelers Limited's obligations arising out of its insurance or reinsurance contracts. Effective March 1, 2006, these guarantees were amended whereby the Company may terminate them at any time upon twelve months prior notice. Effective December 31, 2007, pursuant to the order of English Court, made on December 31, 2007, under Part VII of the Financial Services & Markets Act, obligations relating to certain business as of December 31, 2007, were transferred to Unionamerica Insurance Company Limited (Unionamerica), an affiliate of Travelers Limited. This resulted in those obligations no longer being covered by the guarantees. The guarantees will remain in force, however, for the obligations arising out of insurance or reinsurance contracts not transferred to Unionamerica and for business subsequently written by Travelers Limited. In December 2008, Unionamerica was sold to an unaffiliated entity.

i. The Company guaranteed the timely payment of Discover Reinsurance Company's (Discover Re) obligations with respect to all insurance policies and reinsurance policies issued by Discover Re. On October 1, 2007, Discover Re was merged into Indemnity. The merger resulted in the automatic termination of the guarantee with respect to any future claims. However, the Company continues to guarantee to Indemnity all obligations of Discover Re incurred before the termination date.

j. In a guarantee agreement dated February 9, 2009, the Company has guaranteed certain pension obligations of Travelers Special Services Limited, a wholly-owned subsidiary. The guarantee is not limited in amount and expires once all obligations have been met.

k. The Company is the owner of all the beneficial interests represented by common securities of three business trusts. The trusts exist for the sole purpose of issuing capital securities and common securities and investing the proceeds thereof in deferrable interest junior subordinated debentures, which are held by TRV. The Company fully, irrevocably and unconditionally guaranteed all of the trusts obligations under the capital securities including principal of $254 million and interest. The Company and TRV are both jointly and severally responsible for the payment obligation of the subordinated debentures.

	Nature and circumstances of guarantee and key attributes, including date and duration of agreement	Liability recognition of guarantee. (include amount recognized at inception. If no initial recognition, document exception allowed under SSAP No. 5R)	Ultimate financial statement impact if action under the guarantee is required	Maximum potential amount of future payments (undiscounted) the guarantor could be required to make under the guarantee. If unable to develop an estimate, this should be noted specifically	Current status of payment or performance risk of guarantee. Also provide additional discussion as warranted
a.	Sale of business	The fair value of guarantee liabilities as described are minimal and immaterial to the financial statements taken as a whole	Expense - Statement of Income - Line 14. Aggregate write-ins for miscellaneous income	$ 345,266,000	The Company has assessed the performance risk as remote under these guarantees
b.	Former subsidiary	Fair value initial recognition was $19,120,000	Expense - Statement of Income - Line 14. Aggregate write-ins for miscellaneous income	$ 480,000,000	The Company has assessed the performance risk as low under this guarantee. The AM Best current claims-paying rating of the former subsidiary is "A-"
c.	Real estate joint venture	The fair value of guarantees described are minimal and immaterial to the financial statements taken as a whole	Assets - Line 8 - Other invested assets or Line 3 - Mortgage loans on real estate. Either a capital contribution or loan to joint venture	$ 45,000,000	The Company has assessed the performance risk as remote under these guarantees
d.	Travelers (Bermuda)	The fair value of guarantee liabilities as described are minimal and immaterial to the financial statements taken as a whole	Surplus - Line 35. Dividends to stockholders	$ 50,000,000	The Company has assessed the performance risk as remote under this guarantee
e.	USF&G's obligations	No initial recognition as guarantee is made on behalf of a wholly-owned subsidiary and is considered unlimited in amount.	Assets - Line 2.2 Common stocks	Guarantee has no stated amount or limitation to the maximum potential future payments and accordingly, the Company is unable to develop an estimate of the maximum potential payments for such arrangements	The Company has assessed the performance risk as remote under this guarantee
f.	Travelers Constitution State Insurance Company	No initial recognition as guarantee is made on behalf of a wholly-owned subsidiary	Assets - Line 2.2 Common stocks	$ 5,000,000	The Company has assessed the performance risk as remote under this guarantee
g.	Seaboard Surety Company	No initial recognition as guarantee is made on behalf of a related party and is considered unlimited in amount	Surplus - Line 35. Dividends to stockholders	Guarantee has no stated amount or limitation to the maximum potential future payments and accordingly, the Company is unable to develop an estimate of the maximum potential payments for such arrangements	The Company has assessed the performance risk as remote under this guarantee

NOTES TO FINANCIAL STATEMENTS

	Nature and circumstances of guarantee and key attributes, including date and duration of agreement	Liability recognition of guarantee. (include amount recognized at inception. If no initial recognition, document exception allowed under SSAP No. 5R)	Ultimate financial statement impact if action under the guarantee is required	Maximum potential amount of future payments (undiscounted) the guarantor could be required to make under the guarantee. If unable to develop an estimate, this should be noted specifically	Current status of payment or performance risk of guarantee. Also provide additional discussion as warranted
h.	Travelers Insurance Company Limited	No initial recognition as guarantee is made on behalf of a related party and is considered unlimited in amount	Surplus - Line 35. Dividends to stockholders	Guarantee has no stated amount or limitation to the maximum potential future payments and accordingly, the Company is unable to develop an estimate of the maximum potential payments for such arrangements	The Company has assessed the performance risk as remote under this guarantee
i.	Discover Reinsurance Company	No initial recognition as guarantee is made on behalf of a related party and is considered unlimited in amount	Surplus - Line 35. Dividends to stockholders	Guarantee has no stated amount or limitation to the maximum potential future payments and accordingly, the Company is unable to develop an estimate of the maximum potential payments for such arrangements	The Company has assessed the performance risk as remote under this guarantee
j.	Certain pension obligations of Travelers Special Services Limited, a wholly-owned subsidiary	No initial recognition as guarantee is made on behalf of a wholly-owned subsidiary and is considered unlimited in amount	Assets - Line 2.2 Common stocks	Guarantee has no stated amount or limitation to the maximum potential future payments and accordingly, the Company is unable to develop an estimate of the maximum potential payments for such arrangements	The Company has assessed the performance risk as remote under this guarantee
k.	Trust obligations of three wholly-owned subsidiaries	No initial recognition as guarantee is made on behalf of a wholly-owned subsidiary	Assets - Line 2.2 Common stocks	See below - subject to the same maximum	The Company has assessed the performance risk as low under these guarantees
	Subordinated debentures by its parent to the respective trusts	Fair value initial recognition for debenture guarantees was $24,000,000	Surplus - Line 35. Dividends to stockholders	$ 254,000,000	TRV is current in all debenture obligations. The AM Best current financial strength rating is “a-“.

Aggregate maximum potential of future payments of all guarantees (undiscounted) the guarantor could be required to make under guarantees	$ 1,179,266,000
Current liability recognized in financial statements:	
Noncontingent liabilities	43,120,000
Contingent liabilities	—
Ultimate financial statement impact if action under the guarantee is required:	
Investment in SCA	5,000,000
Dividends to stockholders	304,000,000
Expense	825,266,000
Other	45,000,000
Total	$ 1,179,266,000

2. 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.

3. 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, 2018, 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.

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

15. LEASES

A. Lessee Leasing Arrangements:

Not applicable.

B. Lessor Leases:

1. Operating Leases:

The Company maintains investments in commercial real estate. The land is carried at cost and the buildings at cost less accumulated depreciation and related encumbrances. The buildings are depreciated on a straight-line basis over a period of up to 39 years. The accumulated depreciation on real estate held for the production of income was $478,183,417 and $449,832,558 as of December 31, 2018 and 2017, respectively. At December 31, 2018, the minimum annual lease payments receivable under non-cancelable leasing arrangements are as follows:

Year Ending December 31,	Operating Leases
2019	$ 100,904,354
2020	89,652,993
2021	77,197,190

NOTES TO FINANCIAL STATEMENTS

Year Ending December 31,	Operating Leases
2022	61,680,254
2023	39,184,373
2024 and later years	75,354,107
Total	$ 443,973,271

2. Leveraged 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/or real estate partnerships in which it invests. The off-balance-sheet risk of these financial instruments was $226.4 million at December 31, 2018.

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. See Schedule D – Part 1 for identification and description of securities on loan.

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, 2018:

Description	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Bonds					
Industrial and miscellaneous	$ —	$ 745,489,716	$ —	$ —	$ 745,489,716
Common stock					
Industrial and miscellaneous	85,691,877	—	2,197,320	—	87,889,197
Total securities at fair value	$ 85,691,877	$ 745,489,716	$ 2,197,320	$ —	$ 833,378,913

At December 31, 2018, the Company also holds Level 2 U.S. special revenue bonds measured and reported at their fair value of zero.

NOTES TO FINANCIAL STATEMENTS

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

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

Description	Beginning Balance at 1/1/2018	Transfers into Level 3	Transfers out of Level 3	Total gains & (losses) included in Net Income	Total gains & (losses) included in Surplus	Purchases	Issuances	Sales	Settlements	Ending Balance at 12/31/2018
Common stock	$ 2,132,852	$ —	$ —	$ —	$ 64,468	$ —	$ —	$ —	$ —	$ 2,197,320

During the year, the Company disposed of its Level 3 preferred stock, measured and reported in the previous year at its fair value of zero.

3. Not applicable.

4. Level 2 and Level 3 valuation techniques:

The fair values of bonds are determined by the Company in accordance with NAIC guidelines. These securities are generally priced by the SVO or by a third party organization.

The Company holds unaffiliated common stock where the fair value estimate is determined by an internal portfolio manager based on recent filings, operating results, balance sheet stability, growth and other business and market sector fundamentals. Due to the significant unobservable inputs in these valuations, the Company includes the total fair value estimate for all of these investments in Level 3.

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:

(At December 31, 2018)

Description	Aggregate Fair Value	Admitted Assets	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Short-term bonds	$ 472,855,672	$ 472,856,169	$ 67,081,235	$ 405,774,437	$ —	$ —	$ —
Long-term bonds	12,874,381,708	12,891,814,320	567,541,663	12,298,147,834	8,692,211	—	—
Preferred stock	1,534,000	1,195,000	1,534,000	—	—	—	—
Common stock	87,889,198	87,889,198	85,691,878	—	2,197,320	—	—

(At December 31, 2017)

Description	Aggregate Fair Value	Admitted Assets	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Short-term bonds	$ 553,543,402	$ 553,543,402	$ 128,317,308	$ 425,226,094	$ —	$ —	$ —
Long-term bonds	12,420,666,984	12,143,015,713	522,406,926	11,895,520,627	2,739,431	—	—
Preferred stock	1,885,600	1,195,000	1,885,600	—	—	—	—
Common stock	94,607,282	94,607,282	92,474,430	—	2,132,852	—	—

D. Not applicable.

E. 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.

The Company is the owner and beneficiary of life insurance policies included in Aggregate write-ins for other-than-invested assets at their cash surrender values. At December 31, 2018**,** the cash surrender value in an investment vehicle is $19,111,599 and is allocated between bonds (74%) and equities (26%) based on underlying investment characteristics.

2018 Schedule P:

The 2008 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):

	Accident Years									
Schedule P	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999 & Prior
Part 1A	$ 113	$ 114	$ 98	$ 22	$ 21	$ 34	$ 92	$ 36	$ 9	$ 965
Part 1B	141	201	83	82	46	18	20	22	17	50,686
Part 1C	1,532	4,128	773	(6,802)	1,096	1,638	382	521	825	9,681
Part 1D	93,574	82,567	72,016	61,953	73,864	66,067	61,370	73,452	68,545	685,039

NOTES TO FINANCIAL STATEMENTS

	Accident Years									
Schedule P	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999 & Prior
Part 1E	9,607	12,639	8,813	2,367	2,396	2,103	2,394	2,047	2,043	64,567
Part 1F - Section 1	—	—	2	64	137	571	492	54	315	922
Part 1F - Section 2	22	2,875	(6)	166	183	392	530	963	947	4,506
Part 1G	503	143	281	23	218	591	358	668	1,135	10,440
Part 1H - Section 1	21,795	7,256	11,288	6,925	6,415	11,049	10,753	16,422	14,041	419,082
Part 1H - Section 2	5,876	3,602	7,391	887	1,722	7,060	4,844	8,827	469	25,955
Part 1R - Section 1	5,427	9,048	3,863	7,442	7,285	5,306	4,138	3,707	4,410	187,320
Part 1R - Section 2	190	104	1,229	137	100	386	(157)	1,003	90	2,667

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):

	2002	2001	2000	1999	1998	1997
Commercial auto	$ (4)	$ (1)	$ —	$ —	$ —	$ —
Workers' compensation	(834)	(776)	(150)	(7,915)	—	(246)
Commercial multiple peril	—	—	—	—	—	—
Medical professional liability - claims-made	—	—	—	—	—	—
Special liability	—	—	—	—	—	—
Other liability - occurrence	(487)	—	—	—	—	—
Other liability - claims-made	(9)	(1,504)	—	—	—	—
Special property	—	—	—	—	—	—
Other	—	—	—	—	—	—
Reinsurance A	(146)	—	—	—	—	—
Reinsurance B	(366)	—	—	—	—	—

D. Business Interruption Insurance Recoveries:

Not applicable.

E. State Transferable and Non-transferable Tax Credits:

1. Description of State Transferable and Non-transferable Tax Credits

Description of State Transferable and Non-transferable Tax Credits	State	Carrying Value	Unused Amount
Petros Wyoming Fund Series 2014	WY	$ 245,028	$ 233,421

2. These credits are utilized per a set schedule as outlined in the purchase agreement.

3. Not applicable.

4. State Tax Credits Admitted and Nonadmitted:

	Total Admitted	Total Nonadmitted
Transferable	$ 245,028	$ —
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.

NOTES TO FINANCIAL STATEMENTS

Direct exposure through other investments:

	Actual Cost	Book/Adjusted Carrying Value (excluding interest)	Fair Value	Other-Than-Temporary Impairment Losses Recognized
Residential mortgage-backed securities	$ 1,300,361	$ 852,946	$ 2,018,240	$ 262,929
Structured securities	505,923	228,792	678,769	—
Total	$ 1,806,284	$ 1,081,738	$ 2,697,009	$ 262,929

G. Insurance-Linked Securities (ILS) Contracts:

Not applicable.

22. EVENTS SUBSEQUENT

(1) On January 1, 2019, USF&G made a stock dividend of all its common stock in its direct, wholly-owned insurance company subsidiaries, Fidelity and Guaranty Insurance Company (FGIC) and Fidelity and Guaranty Insurance Underwriters (FGIU), to its parent, the Company.

As a result, FGIC and FGIU became direct, wholly-owned subsidiaries of the Company.

(2) On January 28, 2019, the New York Senate and Assembly passed a bill known as the Child Victims Act (CVA). The New York Governor signed the bill into law on February 14th.

Under prior New York law, a claimant had 5 years from the date of abuse to file a civil action, or if the claimant was a minor at the time of the abuse, before the claimant reached the age of 23. Civil actions against defendants other than the perpetrator (e.g., churches, schools, employers or enablers of the perpetrator) were limited to a 3-year statute of limitations from the date of abuse to file a civil action against those entities, or if the claimant was a minor at the time of the abuse, the civil action was required to be filed before the claimant reached age 21.

Under CVA, claimants asserting childhood sexual molestation may file a civil claim any time prior to the date the claimant reaches the age of 55. Additionally, the new law includes a “reviver” component that allows claimants of any age who allege they were abused as a minor to file a civil claim in court that was time barred under the prior New York law against any allegedly culpable person or entity during a one year “reviver” window that begins six months after CVA takes effect.

The Company is currently evaluating the potential impact of the new law and the likelihood of claims being brought against the Company’s policyholders and does not currently have an estimate of the possible loss or range of losses.

(3) The Company had no additional material subsequent events through February 21, 2019.

23. REINSURANCE

A. Unsecured Reinsurance Recoverables:

1. Affiliated Company Recoverables:

The Company participates in the TRV Reinsurance 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, LAE and unearned premiums at December 31, 2018, in connection with reinsurance agreements among affiliated insurers, were as follows:

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

Company	F.E.I.N	Amount
St. Paul Fire and Marine Insurance Company	41-0406690	$ 12,627,722,108
Travelers Casualty and Surety Company	06-6033504	10,373,037,611
The Phoenix Insurance Company	06-0303275	2,547,177,049
The Standard Fire Insurance Company	06-6033509	2,465,592,895
United States Fidelity and Guaranty Company	52-0515280	2,248,159,473
Travelers Casualty Insurance Company of America	06-0876835	1,390,736,648
Farmington Casualty Company	06-1067463	753,920,590
The Travelers Indemnity Company of Connecticut	06-0336212	700,540,284
The Automobile Insurance Company of Hartford, Connecticut	06-0848755	697,799,191
The Charter Oak Fire Insurance Company	06-0291290	648,166,110
Northland Insurance Company	41-6009967	621,500,908
St. Paul Surplus Lines Insurance Company	41-1230819	448,221,373
The Travelers Indemnity Company of America	58-6020487	394,728,252
St. Paul Protective Insurance Company	36-2542404	295,499,329
Northfield Insurance Company	41-0983992	264,858,078
Travelers Commercial Casualty Company	95-3634110	239,399,895
Travelers Casualty Company of Connecticut	06-1286266	239,390,953
Travelers Commercial Insurance Company	06-1286268	239,390,953
St. Paul Mercury Insurance Company	41-0881659	203,736,979
Travelers Property Casualty Company of America	36-2719165	201,465,871
Travelers Property Casualty Insurance Company	06-1286274	152,802,732
Travelers Constitution State Insurance Company	41-1435766	147,709,307
The Travelers Casualty Company	41-1435765	147,709,307
Travelers Personal Insurance Company	36-3703200	137,522,456
Travelers Excess and Surplus Lines Company	06-1203698	137,522,456
The Travelers Home and Marine Insurance Company	35-1838079	137,522,456
TravCo Insurance Company	35-1838077	137,522,456

NOTES TO FINANCIAL STATEMENTS

Company	F.E.I.N	Amount
Travelers Personal Security Insurance Company	06-1286264	137,522,456
Discover Property & Casualty Insurance Company	36-2999370	71,478,908
Discover Specialty Insurance Company	52-1925132	71,307,931
Northland Casualty Company	94-6051964	71,307,931
Fidelity and Guaranty Insurance Underwriters, Inc.	52-0616768	51,038,697
St. Paul Guardian Insurance Company	41-0963301	50,934,233
American Equity Specialty Insurance Company	86-0868106	50,934,233
Total		$ 39,103,880,109

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

Company	F.E.I.N	Amount
Travelers Property Casualty Company of America	36-2719165	$ 12,961,021,024
The Charter Oak Fire Insurance Company	06-0291290	3,391,327,732
The Standard Fire Insurance Company	06-6033509	3,318,474,875
The Travelers Indemnity Company of America	58-6020487	3,295,489,774
The Travelers Indemnity Company of Connecticut	06-0336212	3,137,170,281
Travelers Casualty and Surety Company	06-6033504	2,917,001,176
St. Paul Fire and Marine Insurance Company	41-0406690	2,877,993,901
The Phoenix Insurance Company	06-0303275	2,706,105,072
The Travelers Home and Marine Insurance Company	35-1838079	2,240,630,773
Travelers Casualty Insurance Company of America	06-0876835	1,981,452,686
United States Fidelity and Guaranty Company	52-0515280	1,437,864,433
Travelers Commercial Insurance Company	06-1286268	1,185,650,765
Travelers Property Casualty Insurance Company	06-1286274	792,146,811
Northland Insurance Company	41-6009967	702,167,378
Farmington Casualty Company	06-1067463	700,222,545
The Automobile Insurance Company of Hartford, Connecticut	06-0848755	632,570,226
St. Paul Mercury Insurance Company	41-0881659	559,816,863
Travelers Personal Insurance Company	36-3703200	407,533,810
Travelers Excess and Surplus Lines Company	06-1203698	356,753,431
Fidelity and Guaranty Insurance Underwriters, Inc.	52-0616768	350,627,364
St. Paul Protective Insurance Company	36-2542404	326,302,048
TravCo Insurance Company	35-1838077	309,082,044
Northfield Insurance Company	41-0983992	272,725,358
Travelers Personal Security Insurance Company	06-1286264	229,531,868
Discover Property & Casualty Insurance Company	36-2999370	162,422,827
St. Paul Surplus Lines Insurance Company	41-1230819	154,097,912
St. Paul Guardian Insurance Company	41-0963301	96,047,229
Travelers Commercial Casualty Company	95-3634110	77,828,557
Travelers Casualty Company of Connecticut	06-1286266	67,587,885
Northland Casualty Company	94-6051964	11,273,775
The Travelers Casualty Company	41-1435765	4,975,158
Travelers Constitution State Insurance Company	41-1435766	2,438,720
Discover Specialty Insurance Company	52-1925132	2,116,366
Total		$ 47,668,450,667

2. Unaffiliated Company Recoverables:

The unsecured aggregate recoverables for ceded losses, LAE and unearned premiums recoverable from any unaffiliated reinsurer at December 31, 2018 that exceeded 3% of the Company's policyholders' surplus, were as follows:

NONE

Additional detail on reinsurance recoverable balances by reinsurer is shown in Schedule F - Part 3.

B. Reinsurance Recoverable in Dispute:

Not applicable.

C. Reinsurance Assumed and Ceded:

1.

	Assumed Reinsurance		Ceded Reinsurance		Net	
	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity
Affiliates	$ 2,708,238,659	$ 301,441,918	$ 159,062,358	$ 17,704,519	$ 2,549,176,301	$ 283,737,399
All Other	5,602,340	623,571	3,946,048	439,217	1,656,292	184,354
Total	$ 2,713,840,999	$ 302,065,489	$ 163,008,406	$ 18,143,736	$ 2,550,832,593	$ 283,921,753

Direct Unearned Premium Reserve $ 194,352,348

NOTES TO FINANCIAL STATEMENTS

2. Accruals for contingent, sliding scale adjustment and other profit sharing commissions, net of reinsurance assumed and ceded, amounted to $57,145,185 at December 31, 2018. This balance represents the Company's 24.79% pro rata share of the net amount of the TRV Reinsurance Pool (see Note 26):

	Direct	Assumed	Ceded	Net
a. Contingent Commission	$ 3,109,359	$ 55,678,660	$ 1,642,834	$ 57,145,185
b. Sliding Scale Adjustments	—	—	—	—
c. Other Profit Commission Arrangements	—	—	—	—
d. Total	$ 3,109,359	$ 55,678,660	$ 1,642,834	$ 57,145,185

D. Uncollectible Reinsurance:

Not applicable.

E. Commutation of Ceded Reinsurance:

Not applicable.

F. Retroactive Reinsurance:

	Assumed	Ceded
a. Reserves Transferred:		
(1) Initial Reserves	$ 2,330,260	$ 50,408,936
(2) Adjustments - Prior Year(s)	(991,600)	36,202,632
(3) Adjustments - Current Year	—	(1,468,750)
(4) Current Total	$ 1,338,660	$ 85,142,818
b. Consideration Paid or Received:		
(1) Initial Consideration	$ 2,591,816	$ 51,333,026
(2) Adjustments - Prior Year(s)	—	3,453,876
(3) Adjustments - Current Year	—	—
(4) Current Total	$ 2,591,816	$ 54,786,902
c. Paid Losses Reimbursed or Recovered:		
(1) Prior Year(s)	$ 1,040,221	$ 72,074,943
(2) Current Year	5,737	496,032
(3) Current Total	$ 1,045,958	$ 72,570,975
d. Special Surplus From Retroactive Reinsurance:		
(1) Initial Surplus Gain or Loss	$ 261,556	$ (924,090)
(2) Adjustments - Prior Year(s)	991,600	32,748,756
(3) Adjustments - Current Year	—	(1,468,750)
(4) Current Year Restricted Surplus	1,253,156	11,536,491
(5) Cumulative Total Transferred to Unassigned Funds	$ —	$ 18,819,425

e. Other insurers included in the above transactions:

Company	Assumed	Ceded
Munich Reinsurance America, Inc. (10227)	$ 1,338,660	$ —
Renaissance Reinsurance U.S. Inc. (10357)	—	26,950,338
XL Reinsurance America Inc. (20583)	—	18,022,631
TIG Insurance Company (25534)	—	17,966,006
Swiss Reinsurance America Corporation (25364)	—	4,430,031
Westport Insurance Corporation (39845)	—	3,821,770
Commercial Risk Reinsurance Co. Ltd. (AA-3190433)	—	3,321,860
Excalibur Reinsurance Corp. (39675)	—	2,340,322
Various	—	8,289,860
Total	$ 1,338,660	$ 85,142,818

f. Paid Loss/LAE Recoverable:

1. Authorized Reinsurers

Company	Total Paid Loss/LAE Recoverable	Amount Over 90 Days Past Due
Renaissance Reinsurance U.S. Inc. (10357)	$ 4,267	$ —
XL Reinsurance America Inc. (20583)	101,654	—
Westport Insurance Corporation (39845)	(1,054)	—
Various	21,207	—
Total	$ 126,074	$ —

NOTES TO FINANCIAL STATEMENTS

G. Reinsurance Accounted for as a Deposit:

As of December 31, 2018, the Company had one assumed reinsurance contract accounted for as a deposit with a non-zero balance. This contract has been in runoff since 2001 and has a deposit balance of $121,604 at year-end. Due to the immaterial nature of the deposit balance the Company accounts for it at the estimated ultimate remaining payments on an undiscounted basis.

As of December 31, 2018, the Company had one ceded reinsurance contract accounted for as a deposit with a non-zero balance. This contract has been in runoff since 2002 and has a balance of $262,013 at year-end. Due to the immaterial nature of this balance the Company accounts for its estimated ultimate remaining recoverable on an undiscounted basis.

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 LAE 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 Reinsurance 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	$ 22,997,727
2.	Unsecured amount	8,657,523
3.	Less: Nonadmitted amount	1,934,924
4.	Less: Nonadmitted for any person for whom agents' balances or uncollected premiums are nonadmitted	402,961
5.	Admitted amount (1) - (3) - (4)	$ 20,659,842

F. Not applicable.

25. CHANGES IN INCURRED LOSSES AND LOSS ADJUSTMENT EXPENSES

In 2018, the prior year-end total loss and LAE reserves developed favorably by $88,933,000, resulting from better than expected loss and defense and cost containment (DCC) experience across multiple Schedule P lines, primarily workers' compensation, other liability - claims-made, special property, and private passenger auto liability. Multiple other lines also contributed to the total favorable development. This favorable development was partially offset by funding of asbestos and environmental reserves, primarily in the other liability - occurrence and products liability - occurrence lines and by unfavorable development in the commercial auto liability line. Lower estimates for adjusting and other expenses also contributed to the total favorable development.

The improvement in workers' compensation was driven by better than expected loss experience for multiple accident years. The improvement in other liability - claims-made was driven primarily by better than expected loss experience for accident years 2015 and prior. The improvement in special property and private passenger auto liability was driven primarily by better than expected loss experience for recent accident years. Additional favorable loss and DCC development was spread across multiple lines and accident years and not concentrated in any particular line or accident year. Unfavorable development in the other liability - occurrence and products liability - occurrence lines was driven primarily by asbestos and environmental funding in "Prior" accident years. Higher than expected loss experience in commercial auto liability was primarily for recent accident years.

The improvement in adjusting and other expense reserves was driven primarily by the favorable underlying loss and DCC experience as well as the allocation of adjusting and other expense reserves by year.

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 Reinsurance Pool, an intercompany pooling arrangement. The lead company of the TRV Reinsurance 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 Reinsurance Pool are as follows:

TRV Reinsurance Pool Participant	NAIC Company Code	Pool Participation %
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 Reinsurance 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, 2018, the Company had a net receivable of $17,797,854 from affiliates as a result of its intercompany reinsurance transactions which settled in January 2019.

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 Reinsurance Pool (see Note 26):

A.

Loss Reserves Eliminated by Annuities	Unrecorded Loss Contingencies
$671,490,642	$671,490,642

B.

Life Insurance Company and Location	Licensed in Company's State of Domicile	Statement Value of Annuities
Fidelity & Guaranty Life Insurance Company, Baltimore, MD	Yes	$ 191,023,820
Brighthouse Life Insurance Company, Charlotte, NC	Yes	65,972,926
All other companies		414,493,896

28. HEALTH CARE RECEIVABLES

Not applicable.

NOTES TO FINANCIAL STATEMENTS

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, 2018
3.	Was anticipated investment income utilized in the calculation?	Yes

31. HIGH DEDUCTIBLES

A. Reserve Credit Recorded on Unpaid Claims and Amount Billed and Recoverable on Paid Claims for High Deductibles:

1. Counterparty exposure recorded on unpaid claims and billed recoverables on paid claims:

Annual Statement Line of Business		Gross (of High Deductible) Loss Reserves	Reserve Credit for High Deductibles	Billed Recoverables on Paid Claims	Total High Deductibles and Billed Recoverables
16	Workers' compensation	$ 2,411,658,912	$ 1,175,414,889	$ 12,160,485	$ 1,187,575,374
19.3, 19.4	Commercial auto liability	251,282,392	156,818,170	1,217,471	158,035,641
21	Auto physical damage	2,577,295	1,750,097	12,487	1,762,584
17.1, 17.2	Other liability	293,690,020	83,940,574	1,422,937	85,363,511
18.1, 18.2	Products liability	123,644,260	29,027,306	599,060	29,626,366
5	Commercial multiple peril	2,474,288	69,715	11,988	81,703
	Total	$ 3,085,327,167	$ 1,447,020,751	$ 15,424,428	$ 1,462,445,179

2. Unsecured amounts of high deductibles:

a.	Total high deductibles and billed recoverables on paid claims	$ 1,462,445,179
b.	Collateral on balance sheet	$ 215,710,099
c.	Collateral off balance sheet	$ 1,204,856,808
d.	Total unsecured deductibles and billed recoverables on paid claims	$ 41,878,272
e.	Percentage unsecured	2.86%

3. High deductible recoverable amounts on paid claims:

a.	Amount of overdue nonadmitted (either due to aging or collateral)	$ 1,651,087
b.	Amount over 90 days overdue admitted	$ 1,039,469
c.	Total overdue (a+b)	$ 2,690,556

4. The deductible amounts for the highest ten unsecured high deductible policies:

Counterparty Ranking	Top Ten Unsecured High Deductibles Amounts
Counterparty 1	$ 14,474,645
Counterparty 2	11,884,478
Counterparty 3	8,983,275
Counterparty 4	8,385,360
Counterparty 5	7,903,005
Counterparty 6	6,251,218
Counterparty 7	5,936,733
Counterparty 8	5,582,511
Counterparty 9	4,380,942
Counterparty 10	3,729,199

B. Unsecured High Deductible Recoverables for Individual Obligors Part of a Group under the Same Management or Control which are Greater than 1% of Capital and Surplus:

Not applicable.

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 – MN
United States Life Tables Total Male or Total Female 2011 – MA
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

NOTES TO FINANCIAL STATEMENTS

Fatal Cases: New York Mandated Mortality & Remarriage Table – NY
United States Life Tables Total Female 2009 – MN **
United States Life Tables Total Female 2011 – MA **
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, 2018 liabilities of the Company included $526,815,058 and $35,308,447 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, 2018 is as follows:

Tabular Discount

		Tabular Discount Included in Schedule P, Part 1 *	
	Schedule P Lines of Business	Case	IBNR
1.	Workers' compensation	$ 72,276,233	$ 154,315,179
2.	Other liability - occurrence	3,068,757	40,084,685
3.	Total	$ 75,344,990	$ 194,399,864

* Excludes medical loss reserves and all loss adjustment expense reserves

In 2018, the accretion of discount reported as part of losses incurred in the Statement of Income totaled $12,249,578.

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 Reinsurance Pool, based on its pro rata participation percentage of 24.79%.

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.

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; the 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 disputes, including litigation, with a number of policyholders, some of whom are in bankruptcy over coverage for asbestos-related claims. Many coverage disputes with policyholders are only resolved through settlement agreements. Because many policyholders make exaggerated demands, it is difficult to predict the outcome of settlement negotiations. Settlements involving bankrupt policyholders may include extensive releases which are favorable to the Company, but which could result in settlements for larger amounts than originally anticipated. Although the Company has seen a reduction in the overall risk associated with these disputes, it remains difficult to predict the ultimate cost of these claims. As in the past, the Company will continue to pursue settlement opportunities.

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, fluctuations, or characteristics suggested by the aggregate paid activity. Conventional actuarial methods are not utilized to establish asbestos reserves and the Company's evaluations have not resulted in a reliable method to determine 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. (TPC) 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 the 2015 payment of the settlement amount resulted in a $124.6 million direct payment and a $118.4 million net payment for asbestos.

On January 29, 2009, TPC and PPG Industries, Inc. (PPG), along with approximately 30 other insurers of PPG, agreed in principle to settle asbestos-related coverage litigation under insurance policies issued to PPG (the Agreement). The Agreement was incorporated into the Modified Third Amended Plan of Reorganization (Amended Plan) proposed as part of the Pittsburgh Corning Corp. (which is 50% owned by PPG) bankruptcy proceeding. On April 27, 2016, the Amended Plan became effective and all the remaining conditions of the

NOTES TO FINANCIAL STATEMENTS

Agreement were satisfied. TPC fully satisfied its obligation under the Agreement by making a discounted payment in the second quarter of 2016. The payment totaled $524 million, of which $518 million was related to asbestos reserves. The Company's allocable share of the 2016 payments resulted in a $128.4 million direct payment and a $113.5 million net payment for asbestos.

1. Direct Basis - Asbestos:	2014	2015	2016	2017	2018
a. Beginning reserves:	$ 590,135,346	$ 576,136,691	$ 448,992,953	$ 323,524,971	$ 335,133,451
b. Incurred losses and LAE:	62,646,561	74,766,640	71,470,561	77,196,060	79,575,900
c. Calendar year payments for losses and LAE:	76,645,216	201,910,378	196,938,543	65,587,580	62,360,521
d. Ending reserves:	$ 576,136,691	$ 448,992,953	$ 323,524,971	$ 335,133,451	$ 352,348,830

2. Assumed Reinsurance Basis - Asbestos:	2014	2015	2016	2017	2018
a. Beginning reserves:	$ 53,423,520	$ 46,171,365	$ 41,046,181	$ 48,660,719	$ 43,353,175
b. Incurred losses and LAE:	1,311,639	1,834,460	16,435,770	6,941,200	5,057,160
c. Calendar year payments for losses and LAE:	8,563,794	6,959,644	8,821,232	12,248,744	5,053,911
d. Ending reserves:	$ 46,171,365	$ 41,046,181	$ 48,660,719	$ 43,353,175	$ 43,356,424

3. Net of Ceded Reinsurance Basis - Asbestos:	2014	2015	2016	2017	2018
a. Beginning reserves:	$ 579,994,405	$ 581,793,027	$ 445,604,988	$ 326,017,068	$ 314,784,420
b. Incurred losses and LAE:	61,975,000	54,538,000	55,678,340	55,628,760	55,380,860
c. Calendar year payments for losses and LAE:	60,176,378	190,726,039	175,266,260	66,861,408	55,450,068
d. Ending reserves:	$ 581,793,027	$ 445,604,988	$ 326,017,068	$ 314,784,420	$ 314,715,212

B. Bulk and IBNR loss and LAE reserves at December 31, 2018 included in Part A above:

1. Direct Basis:	$ 252,746,062
2. Assumed Reinsurance Basis:	$ 17,501,130
3. Net of Ceded Reinsurance Basis:	$ 206,616,938

C. Case, bulk and IBNR LAE reserves at December 31, 2018 included in Part A above:

1. Direct Basis:	$ 185,916,276
2. Assumed Reinsurance Basis:	$ 2,651,895
3. Net of Ceded Reinsurance Basis:	$ 159,510,142

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 only extinguish any liability arising from known specified sites or claims. In many instances, 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. Conventional actuarial methods are not used to estimate these reserves.

The majority of the net environmental reserve is carried in a bulk reserve and 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. Direct Basis - Environmental:	2014	2015	2016	2017	2018
a. Beginning reserves:	$ 67,790,175	$ 68,101,295	$ 75,584,615	$ 81,829,467	$ 80,001,932
b. Incurred losses and LAE:	22,509,320	20,042,715	21,517,721	17,351,872	16,472,183
c. Calendar year payments for losses and LAE:	22,198,200	12,559,395	15,272,869	19,179,407	20,063,006
d. Ending reserves:	$ 68,101,295	$ 75,584,615	$ 81,829,467	$ 80,001,932	$ 76,411,109

2. Assumed Reinsurance Basis - Environmental:	2014	2015	2016	2017	2018
a. Beginning reserves:	$ 15,888,864	$ 15,290,083	$ 14,068,515	$ 13,050,035	$ 10,285,089
b. Incurred losses and LAE:	793,280	37,185	49,580	991,600	1,127,945
c. Calendar year payments for losses and LAE:	1,392,061	1,258,753	1,068,060	3,756,546	1,207,153
d. Ending reserves:	$ 15,290,083	$ 14,068,515	$ 13,050,035	$ 10,285,089	$ 10,205,881

NOTES TO FINANCIAL STATEMENTS

3. Net of Ceded Reinsurance Basis - Environmental:	2014	2015	2016	2017	2018
a. Beginning reserves:	$ 81,573,460	$ 82,290,608	$ 86,562,091	$ 92,026,918	$ 87,435,325
b. Incurred losses and LAE:	21,567,300	17,848,800	20,327,801	16,112,372	13,633,728
c. Calendar year payments for losses and LAE:	20,850,152	13,577,317	14,862,974	20,703,965	19,831,179
d. Ending reserves:	$ 82,290,608	$ 86,562,091	$ 92,026,918	$ 87,435,325	$ 81,237,874

E. Bulk and IBNR loss and LAE reserves at December 31, 2018 included in Part D above:

1. Direct Basis:	$ 75,903,301
2. Assumed Reinsurance Basis:	$ 5,712,982
3. Net of Ceded Reinsurance Basis:	$ 76,759,475

F. Case, bulk and IBNR LAE reserves at December 31, 2018 included in Part D above:

1. Direct Basis:	$ 26,990,872
2. Assumed Reinsurance Basis:	$ 17,119
3. Net of Ceded Reinsurance Basis:	$ 25,132,932

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. Changes in the legal, regulatory and legislative environment may impact the resolution of asbestos and environmental claims and result in adverse loss reserve development. The emergence of a greater number of asbestos or environmental claims beyond that which is anticipated may result in adverse loss reserve development. 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 could affect the settlement of asbestos and environmental 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 insurance 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 2018 Annual Statement – Notes to Financial Statements, Note 9 – Part F:
Names of the companies included with TRV in the December 31, 2018, consolidated Federal income tax return filing

The Travelers Companies, Inc. (TRV) & Subsidiaries

Company Name	EIN	Company Name	EIN
American Equity Insurance Company	86-0703220	The Travelers Casualty Company	41-1435765
American Equity Specialty Insurance Company	86-0868106	The Travelers Home and Marine Insurance Company	35-1838079
BMR Sports Properties, Inc.	52-1852190	The Travelers Indemnity Company	06-0566050
Camperdown Corporation	41-1762781	The Travelers Indemnity Company of America	58-6020487
Discover Property & Casualty Insurance Company	36-2999370	The Travelers Indemnity Company of Connecticut	06-0336212
Discover Specialty Insurance Company	52-1925132	The Travelers Lloyds Insurance Company	76-0002592
English Turn Fidelity Realty, Inc.	52-1466734	TINDY Foreign, Inc.	20-4403403
English Turn Realty Management, Inc.	52-1715225	TPC Investments, Inc.	06-1534005
Farmington Casualty Company	06-1067463	TravCo Insurance Company	35-1838077
Fidelity and Guaranty Insurance Company	42-1091525	Travelers (Bermuda) Limited	98-0190863
Fidelity and Guaranty Insurance Underwriters, Inc.	52-0616768	Travelers Casualty and Surety Company	06-6033504
First Floridian Auto and Home Insurance Company	59-3372141	Travelers Casualty and Surety Company of America	06-0907370
Gulf Underwriters Insurance Company	56-1371361	Travelers Casualty Company of Connecticut	06-1286266
Jupiter Holdings, Inc.	41-1769846	Travelers Casualty Insurance Company of America	06-0876835
Laurel Village Fidelity Realty, Inc.	52-1551225	Travelers Commercial Casualty Company	95-3634110
Northbrook Holdings, Inc.	51-0375653	Travelers Commercial Insurance Company	06-1286268
Northfield Insurance Company	41-0983992	Travelers Constitution State Insurance Company	41-1435766
Northland Casualty Company	94-6051964	Travelers Distribution Alliance, Inc.	62-1657094
Northland Insurance Company	41-6009967	Travelers Excess and Surplus Lines Company	06-1203698
Select Insurance Company	75-6013697	Travelers Global, Inc.	47-2215437
Simply Business Holdings, Inc.	37-1839380	Travelers Insurance Group Holdings Inc.	06-1445591
Simply Business, Inc.	30-0956205	Travelers Lloyds Management Company	20-4312440
SPC Insurance Agency, Inc.	41-1888760	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 Mercury Insurance Company	41-0881659	Travelers Personal Security Insurance Company	06-1286264
St. Paul Protective Insurance Company	36-2542404	Travelers Property Casualty Company of America	36-2719165
St. Paul Surplus Lines Insurance Company	41-1230819	Travelers Property Casualty Corp.	06-1008174
TCI Global Services, Inc.	52-1965525	Travelers Property Casualty Insurance Company	06-1286274
The Automobile Insurance Company of Hartford, Connecticut	06-0848755	Travelers Texas MGA, Inc.	27-4469564
		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
The Standard Fire Insurance Company	06-6033509		

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? If yes, complete Schedule Y, Parts 1, 1A and 2. Yes [X] No [ ]

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 [X] No [ ] N/A [ ]

1.3 State regulating? Connecticut

1.4 Is the reporting entity publicly traded or a member of publicly traded group? Yes [X] No [ ]

1.5 If the response to 1.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group. 86312

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 [X]

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. 12/31/2014

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). 04/26/2016

3.4 By what department or departments?
Insurance Department of 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 [X]

3.6 Have all of the recommendations within the latest financial examination report been complied with? Yes [ ] No [ ] N/A [X]

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 [X] No [ ]

4.12 renewals? Yes [X] 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 [X]

4.22 renewals? Yes [ ] No [X]

5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes [ ] No [X]

If the answer is YES, complete and file the merger history data file with the NAIC.

5.2 If yes, provide the 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 [X]

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 [X]

7.2 If yes,

7.21 State the percentage of foreign control 0.0%

7.22 State the nationality(s) of the foreign person(s) or entity(s); or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact and identify the type of entity(s) (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 [X]

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 [X]

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 any exemptions to the prohibited non-audit services provided by the certified independent public accountant 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 [X]

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 [X]

10.4 If the response to 10.3 is yes, provide information related to this exemption:

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

10.5 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? Yes [X] No [ ] N/A [ ]

10.6 If the response to 10.5 is no or n/a, please explain:

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?
Julie M. Joyce, FCAS, MAAA (Vice President and Chief Corporate Actuary), 385 Washington Street, St. Paul, MN 55102

12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? Yes [X] No [ ]

12.11 Name of real estate holding company 350 Market Street, LLC

12.12 Number of parcels involved 1

12.13 Total book/adjusted carrying value $ 17,834,049

12.2 If yes, provide explanation
Holds a 254 room hotel in St. Paul, MN.

13. **FOR UNITED STATES BRANCHES 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 [X] 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 [X]

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 [X]

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 [X] 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
104000854	American National Bank	Failure to comply with contract.	$ 350,000
084201278	BancorpSouth Bank	Failure to comply with contract.	$ 60,000
063108680	Bank of Tampa	Failure to comply with contract.	$ 26,966
096000580	BankCherokee	Failure to comply with contract.	$ 10,000
111902055	Benchmark Bank	Failure to comply with contract.	$ 150,000
051403041	First National Bank	Failure to comply with contract.	$ 100,000
101114109	First Option Bank	Failure to comply with contract.	$ 16,000
081918425	First State Community Bank	Failure to comply with contract.	$ 4,000
064009461	FirstBank	Failure to comply with contract.	$ 25,000
0	Imperial Chemical Ind PLC	Failure to comply with contract.	$ 1,890,000
091208138	Kensington Bank	Failure to comply with contract.	$ 200,000
062106256	Merchants Bank	Failure to comply with contract.	$ 12,500
0	Southwest Georgia Farm Credit	Failure to comply with contract.	$ 100,000
096001013	Sunrise Banks, National Association	Failure to comply with contract.	$ 30,000
061100606	Synovus Bank	Failure to comply with contract.	$ 25,000
091017196	Venture Bank	Failure to comply with contract.	$ 216,000

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 [X] No [ ]

17. Does the reporting entity keep a complete permanent record of the proceedings of its Board of Directors and all subordinate committees thereof? Yes [X] 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 [X] 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 [X]

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

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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 [X]
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 [X]
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 [X]
23.2	If yes, indicate any amounts receivable from parent included in the Page 2 amount:	$	0

INVESTMENT

24.01	Were all 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 [X] 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 [X] No [ ] N/A [ ]
24.05	If answer to 24.04 is yes, report amount of collateral for conforming programs.	$	145,140,015
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 [X] No [ ] N/A [ ]
24.08	Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%?		Yes [X] 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 [X] 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:	$	145,140,015
	24.102 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2:	$	145,140,015
	24.103 Total payable for securities lending reported on the liability page:	$	145,140,015
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 [X] No [ ]
25.2	If yes, state the amount thereof at December 31 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	$	1,336,429,167
	25.29 On deposit with other regulatory bodies	$	2,370,733
	25.30 Pledged as collateral – excluding collateral pledged to an FHLB	$	28,346,650
	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
		$ 0

26.1	Does the reporting entity have any hedging transactions reported on Schedule DB?		Yes [ ] No [X]
26.2	If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? If no, attach a description with this statement.		Yes [ ] No [ ] N/A [X]
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 [X]
27.2	If yes, state the amount thereof at December 31 of the current year:	$	0

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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 [X] No [ ]

28.01 For agreements that comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, complete the following:

1 Name of Custodian(s)	2 Custodian's Address
JPMorgan Chase	270 Park Avenue, New York, NY 10017-2070
The Bank of New York Mellon	225 Liberty Street, New York, NY 10007

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)
CIBC Mellon	1 York Street	Custodial account for Canadian Branch
	Toronto, ON M5J 0B6	
Citigroup Inc.	390 Greenwich Street	Brokerage account
	New York, NY 10013	

28.03 Have there been any changes, including name changes, in the custodian(s) identified in 28.01 during the current year? Yes [ ] No [X]

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 Investment management – Identify all investment advisors, investment managers, broker/dealers, including individuals that have the authority to make investment decisions on behalf of the reporting entity. For assets that are managed internally by employees of the reporting entity, note as such. ["…that have access to the investment accounts", "… handle securities"].

1 Name of Firm or Individual	2 Affiliation
CBRE Clarion Securities	U
The Travelers Indemnity Company	A

28.0597 For those firms/individuals listed in the table for Question 28.05, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's assets? Yes [ ] No [X]

28.0598 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 28.05, does the total assets under management aggregate to more than 50% of the reporting entity's assets? Yes [ ] No [X]

28.06 For those firms or individuals listed in the table for 28.05 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1 Central Registration Depository Number	2 Name of Firm or Individual	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed
106256	CBRE Clarion Securities		SEC file # 801-49083	NO
	The Travelers Indemnity Company		Not a registered investment advisor	DS

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 [X]

29.2 If yes, complete the following schedule:

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 Holding	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	$ 13,364,670,489	$ 13,347,237,384	$ (17,433,105)
30.2	Preferred Stocks	$ 1,195,000	$ 1,534,000	$ 339,000
30.3	Totals	$ 13,365,865,489	$ 13,348,771,384	$ (17,094,105)

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

Fair values of bonds and preferred stocks 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.

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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 reliable 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:

33. By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designation 5GI security:
   a. Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
   b. Issuer or obligor is current on all contracted interest and principal payments.
   c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

   Has the reporting entity self-designated 5GI securities? Yes [X] No [ ]

34. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:
   a. The security was purchased prior to January 1, 2018.
   b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
   c. The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as an NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
   d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

   Has the reporting entity self-designated PLGI securities? Yes [ ] No [X]

OTHER

35.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any? $ 11,883,408

35.2 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	$ 6,051,846

36.1 Amount of payments for legal expenses, if any? $ 18,198,153

36.2 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

37.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any? $ 565,420

37.2 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 Current Year	2 Prior Year
2.1	Premium Numerator	$ 0	$ 0
2.2	Premium Denominator	$ 5,924,795,175	$ 5,638,299,747
2.3	Premium Ratio (2.1/2.2)	0.0%	0.0%
2.4	Reserve Numerator	$ 0	$ 0
2.5	Reserve Denominator	$ 12,940,288,032	$ 12,503,745,524
2.6	Reserve Ratio (2.4/2.5)	0.0%	0.0%

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		$ 69,318,235
	3.22 Non-participating policies		$ 5,982,788,861
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?		0.0%
	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 [ ] N/A [ ]
	5.22 As a direct expense of the exchange		Yes [ ] No [ ] N/A [ ]
	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 fulfillment 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?

The Company's risk managemnt 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.

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:

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.

GENERAL INTERROGATORIES

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

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?
The Company purchases both excess of loss and proportional reinsurance to protect itself from an excessive catastrophe loss.

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 [ ] No [X]

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:
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 are adequate to cover its exposures in a catastrophic event.

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 [X] No [ ]

7.2 If yes, indicate the number of reinsurance contracts containing such provisions. 6

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 [X] No [ ]

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 [ ] No [X]

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 [ ] No [X]

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 [ ] No [X]

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 [ ] No [X]

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, Yes [ ] No [X]

(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 Yes [ ] No [X]

(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 [ ] No [X]

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 [X] No [ ] N/A [ ]

11.1 Has the reporting entity guaranteed policies issued by any other entity and now in force? Yes [X] No [ ]

11.2 If yes, give full information
Refer to Note 14G as there are several guarantees in force.

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	$ 18,504,472
12.12	Unpaid underwriting expenses (including loss adjustment expenses)	$ 3,265,495

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? $ 45,148,819

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 [ ] No [X] N/A [ ]

GENERAL INTERROGATORIES

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

12.4 If yes, provide the range of interest rates charged under such notes during the period covered by this statement:

12.41	From	0.0%
12.42	To	0.0%

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 [X] No [ ]

12.6 If yes, state the amount thereof at December 31 of current year:

12.61	Letters of Credit	$ 1,360,657,515
12.62	Collateral and other funds	$ 494,303,037

13.1 Largest net aggregate amount insured in any one risk (excluding workers' compensation): $ 8,924,400

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 [ ] No [X]

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. 2

14.1 Is the reporting entity a cedant in a multiple cedant reinsurance contract? Yes [X] No [ ]

14.2 If yes, please describe the method of allocating and recording reinsurance among the cedants:
Per the Company's Reinsurance Allocation Agreement and Pooling Agreement.

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 [ ] No [X]

14.4 If the answer to 14.3 is no, are all the methods described in 14.2 entirely contained in written agreements? Yes [X] No [ ]

14.5 If the answer to 14.4 is no, please explain:

15.1 Has the reporting entity guaranteed any financed premium accounts? Yes [ ] No [X]

15.2 If yes, give full information

16.1 Does the reporting entity write any warranty business? Yes [ ] No [X]

If yes, disclose the following information for each of the following types of warranty coverage:

		1 Direct Losses Incurred	2 Direct Losses Unpaid	3 Direct Written Premium	4 Direct Premium Unearned	5 Direct Premium Earned
16.11	Home	$ 0	$ 0	$ 0	$ 0	$ 0
16.12	Products	$ 0	$ 0	$ 0	$ 0	$ 0
16.13	Automobile	$ 0	$ 0	$ 0	$ 0	$ 0
16.14	Other*	$ 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 is exempt from the statutory provision for unauthorized reinsurance? Yes [ ] No [X]

Incurred but not reported losses on contracts in force prior to July 1, 1984, and not subsequently renewed are exempt from the statutory provision for unauthorized reinsurance. Provide the following information for this exemption:

17.11	Gross amount of unauthorized reinsurance in Schedule F-Part 3 exempt from the statutory provision for unauthorized reinsurance	$ 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

18.1 Do you act as a custodian for health savings accounts? Yes [ ] No [X]

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 [ ] No [X]

18.4 If yes, please provide the balance of the funds administered as of the reporting date. $ 0

19. Is the reporting entity licensed or charted, registered, qualified, eligible, or writing business in at least 2 states? Yes [X] No [ ]

19.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? Yes [ ] No [ ]

FIVE-YEAR HISTORICAL DATA

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

		1 2018	2 2017	3 2016	4 2015	5 2014
	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)	3,288,262,315	3,129,716,796	2,997,728,938	2,951,106,153	3,013,330,809
2.	Property lines (Lines 1, 2, 9, 12, 21 & 26)	1,200,411,279	1,128,405,066	1,073,079,390	1,010,426,853	996,647,088
3.	Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	1,884,194,374	1,788,449,399	1,731,784,059	1,706,691,307	1,723,018,639
4.	All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	25,818,544	24,505,483	25,427,976	34,804,183	30,652,851
5.	Nonproportional reinsurance lines (Lines 31, 32 & 33)	20,811,852	28,092,894	27,369,414	32,306,113	35,357,135
6.	Total (Line 35)	6,419,498,364	6,099,169,639	5,855,389,777	5,735,334,609	5,799,006,523
	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)	2,995,191,532	2,860,790,525	2,720,411,732	2,580,895,960	2,495,619,434
8.	Property lines (Lines 1, 2, 9, 12, 21 & 26)	1,140,332,062	1,069,147,185	1,007,347,160	932,113,566	900,044,124
9.	Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	1,882,971,087	1,787,679,905	1,729,513,647	1,699,614,097	1,700,904,162
10.	All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	22,089,563	20,786,386	20,782,928	25,697,550	11,346,630
11.	Nonproportional reinsurance lines (Lines 31, 32 & 33)	11,522,852	10,687,561	12,426,074	13,797,121	15,438,694
12.	Total (Line 35)	6,052,107,096	5,749,091,562	5,490,481,541	5,252,118,293	5,123,353,043
	Statement of Income (Page 4)					
13.	Net underwriting gain (loss) (Line 8)	70,468,791	30,609,752	288,669,930	540,472,404	463,627,636
14.	Net investment gain (loss) (Line 11)	707,693,786	806,078,745	1,116,634,247	944,817,655	725,498,043
15.	Total other income (Line 15)	5,938,623	10,737,182	8,638,688	8,406,687	5,191,642
16.	Dividends to policyholders (Line 17)	11,505,116	11,249,525	10,679,857	8,523,590	7,800,320
17.	Federal and foreign income taxes incurred (Line 19)	128,089,019	124,020,760	203,825,992	298,412,018	252,839,473
18.	Net income (Line 20)	644,507,065	712,155,393	1,199,437,015	1,186,761,138	933,677,528
	Balance Sheet Lines (Pages 2 and 3)					
19.	Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3)	19,476,302,837	18,716,417,995	18,558,671,505	18,297,596,634	18,917,210,617
20.	Premiums and considerations (Page 2, Col. 3):					
	20.1 In course of collection (Line 15.1)	689,465,645	666,601,355	652,490,362	645,272,037	632,108,579
	20.2 Deferred and not yet due (Line 15.2)	1,248,413,413	1,200,356,349	1,134,897,186	1,063,079,407	1,021,388,391
	20.3 Accrued retrospective premiums (Line 15.3)	20,659,842	21,386,725	15,847,005	19,832,974	20,790,245
21.	Total liabilities excluding protected cell business (Page 3, Line 26)	13,771,734,477	13,349,136,294	13,000,440,163	12,734,324,153	12,923,140,386
22.	Losses (Page 3, Line 1)	7,984,646,252	7,733,842,902	7,498,180,997	7,422,324,562	7,493,585,203
23.	Loss adjustment expenses (Page 3, Line 3)	1,857,084,301	1,828,248,006	1,789,419,482	1,742,046,642	1,852,640,576
24.	Unearned premiums (Page 3, Line 9)	2,745,184,940	2,611,325,104	2,494,094,671	2,387,044,917	2,317,727,202
25.	Capital paid up (Page 3, Lines 30 & 31)	20,000,000	20,000,000	20,000,000	20,000,000	20,000,000
26.	Surplus as regards policyholders (Page 3, Line 37)	5,704,568,360	5,367,281,700	5,558,231,343	5,563,272,481	5,994,070,231
	Cash Flow (Page 5)					
27.	Net cash from operations (Line 11)	1,041,282,338	1,044,598,440	1,434,174,401	802,726,523	839,064,556
	Risk-Based Capital Analysis					
28.	Total adjusted capital	5,704,568,360	5,367,281,700	5,558,231,343	5,563,272,481	5,994,070,231
29.	Authorized control level risk-based capital	1,211,714,159	1,152,815,229	1,053,557,422	1,026,383,100	1,043,218,567
	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)	75.8	74.2	70.7	65.6	62.6
31.	Stocks (Lines 2.1 & 2.2)	11.6	12.1	14.4	16.7	23.6
32.	Mortgage loans on real estate (Lines 3.1 & 3.2)	0.0	0.0	0.0	0.3	0.3
33.	Real estate (Lines 4.1, 4.2 & 4.3)	4.7	4.8	4.8	4.9	4.6
34.	Cash, cash equivalents and short-term investments (Line 5)	3.0	3.6	4.2	6.8	3.1
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)	4.1	4.5	4.6	5.0	5.1
38	Receivables for securities (Line 9)	0.0	0.1	0.2	0.0	0.0
39.	Securities lending reinvested collateral assets (Line 10)	0.9	0.8	1.1	0.7	0.8
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)	1,899,458,579	1,895,256,630	1,961,871,975	2,353,281,162	3,439,726,128
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	47,153,170	51,355,256	49,172,636	50,105,990	49,439,397
48.	Total of above lines 42 to 47	1,946,611,748	1,946,611,886	2,011,044,611	2,403,387,152	3,489,165,525
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)	34.1	36.3	36.2	43.2	58.2

FIVE-YEAR HISTORICAL DATA

(Continued)

		1 2018	2 2017	3 2016	4 2015	5 2014
	Capital and Surplus Accounts (Page 4)					
51.	Net unrealized capital gains (losses) (Line 24)	(38,524,787)	(141,455,542)	(339,525,361)	(255,675,706)	283,461,008
52.	Dividends to stockholders (Line 35)	(255,000,000)	(665,000,000)	(858,000,000)	(1,264,000,000)	(1,085,800,000)
53.	Change in surplus as regards policyholders for the year (Line 38)	337,286,659	(190,949,642)	(5,041,138)	(430,797,751)	79,372,948
	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)	1,869,597,225	1,876,303,415	1,844,265,454	1,764,341,011	1,685,590,205
55.	Property lines (Lines 1, 2, 9, 12, 21 & 26)	684,625,764	717,059,828	555,777,300	500,462,255	519,815,243
56.	Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	1,055,080,004	892,832,918	751,964,076	716,141,651	767,254,624
57.	All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	6,881,482	34,807,311	18,469,793	18,556,823	25,318,844
58.	Nonproportional reinsurance lines (Lines 31, 32 & 33)	41,614,273	64,150,723	31,528,614	53,661,154	63,774,481
59.	Total (Line 35)	3,657,798,747	3,585,154,194	3,202,005,237	3,053,162,893	3,061,753,397
	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)	1,519,196,906	1,464,069,722	1,435,338,405	1,326,108,567	1,262,944,341
61.	Property lines (Lines 1, 2, 9, 12, 21 & 26)	655,417,592	667,983,878	530,338,027	457,150,925	462,010,226
62.	Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	1,047,531,397	881,726,843	740,027,958	700,582,780	728,374,096
63.	All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	3,621,723	6,173,563	11,191,005	9,974,426	16,288,426
64.	Nonproportional reinsurance lines (Lines 31, 32 & 33)	13,569,270	24,813,730	13,492,411	18,139,971	30,185,563
65.	Total (Line 35)	3,239,336,888	3,044,767,736	2,730,387,807	2,511,956,669	2,499,802,652
	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)	58.9	58.2	52.1	47.1	46.2
68.	Loss expenses incurred (Line 3)	10.5	11.4	11.7	11.7	14.1
69.	Other underwriting expenses incurred (Line 4)	29.4	29.9	30.8	30.8	30.6
70.	Net underwriting gain (loss) (Line 8)	1.2	0.5	5.4	10.4	9.1
	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)	28.7	29.1	30.1	30.3	30.2
72.	Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0)	69.4	69.5	63.8	58.8	60.3
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)	106.1	107.1	98.8	94.4	85.5
	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)	(59,198)	(132,325)	(105,512)	(172,825)	(295,461)
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)	(1.1)	(2.4)	(1.9)	(2.9)	(5.0)
	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)	(215,459)	(207,993)	(271,751)	(415,474)	(438,279)
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)	(3.9)	(3.7)	(4.5)	(7.0)	(7.3)

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
				Loss Payments		Defense and Cost Containment Payments		Adjusting and Other Payments		10	11	Number of Claims Reported-Direct and Assumed
	1 Direct and Assumed	2 Ceded	3 Net (Cols. 1 - 2)	4 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded	Salvage and Subrogation Received	Total Net Paid (Cols. 4 - 5 + 6 - 7 + 8 - 9)	
1. Prior	XXX	XXX	XXX	191,852	41,849	68,488	6,878	23,579	210	(2,885)	234,982	XXX
2. 2009	5,305,675	437,168	4,868,507	2,528,562	203,165	228,624	12,010	260,725	3,157	145,797	2,799,579	XXX
3. 2010	5,241,738	397,901	4,843,838	2,762,482	156,260	246,897	11,048	265,643	2,411	150,628	3,105,303	XXX
4. 2011	5,404,811	387,081	5,017,730	3,350,985	224,842	263,082	13,515	276,207	2,562	157,664	3,649,354	XXX
5. 2012	5,519,993	421,328	5,098,665	3,194,146	486,525	256,640	24,485	288,259	4,295	147,534	3,223,740	XXX
6. 2013	5,563,004	448,235	5,114,768	2,455,450	170,708	226,014	8,890	268,479	6,540	128,095	2,763,805	XXX
7. 2014	5,532,335	422,846	5,109,489	2,349,504	156,317	220,870	12,154	255,808	6,171	121,747	2,651,540	XXX
8. 2015	5,590,863	380,198	5,210,665	2,237,869	125,404	173,691	7,529	257,725	4,932	118,061	2,531,421	XXX
9. 2016	5,751,962	359,845	5,392,116	2,203,173	117,712	121,738	5,425	267,803	927	128,897	2,468,650	XXX
10. 2017	5,963,759	325,460	5,638,299	2,312,567	127,678	80,263	3,707	268,185	477	141,853	2,529,153	XXX
11. 2018	6,243,931	319,136	5,924,795	1,536,127	40,301	34,382	1,025	225,025	354	84,871	1,753,855	XXX
12. Totals	XXX	XXX	XXX	25,122,717	1,850,761	1,920,689	106,667	2,657,439	32,034	1,322,261	27,711,382	XXX

	Losses Unpaid				Defense and Cost Containment Unpaid				Adjusting and Other Unpaid		23	24	25
	Case Basis		Bulk + IBNR		Case Basis		Bulk + IBNR		21	22		Total Net Losses and Expenses Unpaid	Number of Claims Outstanding-Direct and Assumed
	13 Direct and Assumed	14 Ceded	15 Direct and Assumed	16 Ceded	17 Direct and Assumed	18 Ceded	19 Direct and Assumed	20 Ceded	Direct and Assumed	Ceded	Salvage and Subrogation Anticipated		
1. Prior	1,552,216	460,968	1,077,470	206,288	152,991	14,966	301,184	43,937	151,192	133	4,706	2,508,761	XXX
2. 2009	67,580	6,613	71,102	6,586	6,022	156	11,253	(968)	4,537	(4)	1,524	148,111	XXX
3. 2010	87,450	11,126	89,413	4,574	8,320	193	15,422	1,486	6,562	13	1,990	189,777	XXX
4. 2011	97,652	7,832	101,940	6,384	11,068	(185)	21,234	308	7,098	(4)	3,133	224,658	XXX
5. 2012	146,751	14,126	141,020	16,399	13,494	360	39,717	812	8,430	65	4,195	317,649	XXX
6. 2013	171,486	18,359	161,202	24,339	17,064	698	57,635	677	14,886	11	5,683	378,187	XXX
7. 2014	209,625	26,762	187,431	17,781	23,831	1,645	66,108	1,562	19,711	154	10,093	458,803	XXX
8. 2015	268,464	27,082	299,046	30,829	33,271	973	62,470	1,575	29,414	115	16,051	632,092	XXX
9. 2016	437,735	47,430	445,623	36,273	50,391	1,191	103,590	1,284	50,338	256	27,499	1,001,241	XXX
10. 2017	650,413	97,379	774,219	50,551	56,945	1,801	143,198	1,861	64,120	212	45,637	1,537,091	XXX
11. 2018	848,356	90,727	1,388,146	81,286	60,039	2,283	206,521	3,855	120,772	321	108,500	2,445,361	XXX
12. Totals	4,537,728	808,404	4,736,612	481,290	433,437	24,082	1,028,332	56,391	477,060	1,273	229,011	9,841,730	XXX

	Total Losses and Loss Expenses Incurred			Loss and Loss Expense Percentage (Incurred/Premiums Earned)			Nontabular Discount		34	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	Inter-Company Pooling Participation Percentage	35 Losses Unpaid	36 Loss Expenses Unpaid
1. Prior	XXX	XXX	XXX	XXX	XXX	XXX	0	0	XXX	1,962,430	546,331
2. 2009	3,178,405	230,714	2,947,690	59.9	52.8	60.5	0	0	24.79	125,483	22,629
3. 2010	3,482,191	187,111	3,295,080	66.4	47.0	68.0	0	0	24.79	161,164	28,613
4. 2011	4,129,267	255,255	3,874,012	76.4	65.9	77.2	0	0	24.79	185,377	39,282
5. 2012	4,088,456	547,068	3,541,388	74.1	129.8	69.5	0	0	24.79	257,245	60,403
6. 2013	3,372,215	230,223	3,141,992	60.6	51.4	61.4	0	0	24.79	289,989	88,198
7. 2014	3,332,888	222,545	3,110,343	60.2	52.6	60.9	0	0	24.79	352,514	106,289
8. 2015	3,361,951	198,439	3,163,512	60.1	52.2	60.7	0	0	24.79	509,599	122,492
9. 2016	3,680,390	210,500	3,469,891	64.0	58.5	64.4	0	0	24.79	799,654	201,587
10. 2017	4,349,912	283,667	4,066,245	72.9	87.2	72.1	0	0	24.79	1,276,702	260,389
11. 2018	4,419,368	220,153	4,199,216	70.8	69.0	70.9	0	0	24.79	2,064,489	380,872
12. Totals	XXX	XXX	XXX	XXX	XXX	XXX	0	0	XXX	7,984,646	1,857,084

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	2	3	4	5	6	7	8	9	10	11	12
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	One Year	Two Year
1. Prior	7,568,091	7,325,548	7,110,520	6,944,629	6,841,774	6,671,935	6,625,572	6,599,319	6,628,217	6,652,711	24,494	53,392
2. 2009	2,851,066	2,838,773	2,815,547	2,786,932	2,756,060	2,739,676	2,736,283	2,715,309	2,703,064	2,693,602	(9,462)	(21,707)
3. 2010	XXX	3,015,148	3,109,452	3,090,677	3,072,619	3,060,365	3,058,574	3,053,804	3,040,316	3,034,484	(5,832)	(19,320)
4. 2011	XXX	XXX	3,669,548	3,694,680	3,691,061	3,657,589	3,658,090	3,629,202	3,612,481	3,604,017	(8,463)	(25,185)
5. 2012	XXX	XXX	XXX	3,360,218	3,352,200	3,311,134	3,275,403	3,273,044	3,264,430	3,259,983	(4,446)	(13,061)
6. 2013	XXX	XXX	XXX	XXX	2,971,761	2,949,868	2,915,785	2,905,290	2,894,919	2,876,524	(18,394)	(28,766)
7. 2014	XXX	XXX	XXX	XXX	XXX	2,960,003	2,906,739	2,901,231	2,866,159	2,852,963	(13,196)	(48,268)
8. 2015	XXX	XXX	XXX	XXX	XXX	XXX	2,944,245	2,937,522	2,902,889	2,893,862	(9,027)	(43,660)
9. 2016	XXX	XXX	XXX	XXX	XXX	XXX	XXX	3,235,949	3,205,967	3,167,065	(38,902)	(68,883)
10. 2017	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	3,725,670	3,749,701	24,032	XXX
11. 2018	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	3,870,092	XXX	XXX
12. Totals											(59,198)	(215,459)

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	2	3	4	5	6	7	8	9	10	Number of Claims Closed With Loss Payment	Number of Claims Closed Without Loss Payment
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018		
1. Prior	000	1,095,487	1,821,871	2,364,603	2,748,436	3,081,896	3,353,629	3,698,872	3,933,337	4,144,950	XXX	XXX
2. 2009	1,089,000	1,681,838	1,985,619	2,193,383	2,334,005	2,411,219	2,468,814	2,502,355	2,526,204	2,542,011	XXX	XXX
3. 2010	XXX	1,212,049	1,873,195	2,219,613	2,457,575	2,622,665	2,720,196	2,780,925	2,820,049	2,842,071	XXX	XXX
4. 2011	XXX	XXX	1,656,437	2,404,037	2,762,932	3,003,364	3,175,403	3,271,031	3,333,714	3,375,710	XXX	XXX
5. 2012	XXX	XXX	XXX	1,359,664	2,069,661	2,390,263	2,638,246	2,791,312	2,888,565	2,939,775	XXX	XXX
6. 2013	XXX	XXX	XXX	XXX	1,114,646	1,695,047	2,015,479	2,241,501	2,402,715	2,501,866	XXX	XXX
7. 2014	XXX	XXX	XXX	XXX	XXX	1,107,392	1,675,623	2,001,538	2,245,886	2,401,903	XXX	XXX
8. 2015	XXX	XXX	XXX	XXX	XXX	XXX	1,090,885	1,695,166	2,034,367	2,278,627	XXX	XXX
9. 2016	XXX	XXX	XXX	XXX	XXX	XXX	XXX	1,183,277	1,856,278	2,201,774	XXX	XXX
10. 2017	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	1,462,515	2,261,445	XXX	XXX
11. 2018	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	1,529,183	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	2	3	4	5	6	7	8	9	10
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
1. Prior	4,255,689	3,440,301	2,845,654	2,456,541	2,196,126	1,860,008	1,672,433	1,408,521	1,295,922	1,217,672
2. 2009	1,135,671	669,554	469,038	326,260	233,816	176,893	149,560	117,825	98,753	83,912
3. 2010	XXX	1,095,186	690,736	450,076	305,027	215,226	172,958	139,255	119,031	106,790
4. 2011	XXX	XXX	1,206,192	709,072	489,893	324,084	241,008	181,984	143,693	125,998
5. 2012	XXX	XXX	XXX	1,231,934	744,057	489,495	332,849	258,936	206,371	173,445
6. 2013	XXX	XXX	XXX	XXX	1,148,098	721,915	477,449	345,990	274,270	203,420
7. 2014	XXX	XXX	XXX	XXX	XXX	1,226,074	722,005	496,769	327,405	244,959
8. 2015	XXX	XXX	XXX	XXX	XXX	XXX	1,199,451	731,264	484,657	339,422
9. 2016	XXX	XXX	XXX	XXX	XXX	XXX	XXX	1,328,250	789,139	522,761
10. 2017	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	1,462,671	877,902
11. 2018	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	1,525,386

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories

States, Etc.	1 Active Status (a)	Gross Premiums, Including Policy and Membership Fees Less Return Premiums and Premiums on Policies Not Taken 2 Direct Premiums Written	3 Direct Premiums Earned	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)
1. Alabama AL	L	754,585	510,298	56	836,381	(1,594,357)	26,175,132	575	0
2. Alaska AK	L	140,041	113,066	0	165,631	(226,620)	4,962,492	12	0
3. Arizona AZ	L	262,548	(84,794)	0	2,591,490	(537,390)	20,714,167	122	0
4. Arkansas AR	L	1,465,133	1,381,505	1,703	1,737,713	697,674	9,466,572	1,155	0
5. California CA	L	20,699,191	20,518,277	6	36,459,969	18,413,932	126,635,288	17,907	0
6. Colorado CO	L	15,650,036	15,658,663	0	6,444,099	8,372,296	44,121,904	16,669	0
7. Connecticut CT	L	158,149	148,277	0	678,247	(495,377)	16,824,342	1	0
8. Delaware DE	L	17,758	12,000	0	906,783	39,734	3,933,974	0	0
9. District of Columbia DC	L	20,014	(31,851)	0	672,489	424,629	5,009,363	8	0
10. Florida FL	L	2,348,125	3,308,906	90,636	14,778,871	4,718,279	50,522,153	792	0
11. Georgia GA	L	139,165	(36,047)	187	916,596	(3,892,458)	28,628,455	0	0
12. Hawaii HI	L	22,303	16,892	0	779,396	(111,149)	2,156,680	0	0
13. Idaho ID	L	42,005	41,999	0	99,588	(63,089)	1,322,477	14	0
14. Illinois IL	L	1,582,732	2,952,861	0	6,257,519	(18,993,091)	58,275,126	1,063	0
15. Indiana IN	L	222,931	32,820	0	6,896,785	5,848,165	12,022,289	61	0
16. Iowa IA	L	69,026	1,091	0	2,001,415	(127,381)	15,724,769	3	0
17. Kansas KS	L	9,172,580	8,980,846	0	2,551,138	4,093,460	22,575,623	5,548	0
18. Kentucky KY	L	2,202,885	1,773,103	0	1,297,077	253,248	10,062,770	1,302	0
19. Louisiana LA	L	15,669,296	15,964,318	0	29,970,604	20,934,419	49,155,655	8,541	0
20. Maine ME	L	45,812	33,529	0	6,750	(274,517)	1,736,592	0	0
21. Maryland MD	L	288,969	229,623	0	881,938	(2,560,697)	29,948,030	42	0
22. Massachusetts MA	L	390,464	207,512	0	1,100,024	(5,681,063)	30,925,613	62	0
23. Michigan MI	L	3,281,208	2,597,626	0	1,730,138	2,005,159	38,883,401	1,876	0
24. Minnesota MN	L	167,356	(2,238,884)	0	7,872,418	9,878,479	60,747,981	33	0
25. Mississippi MS	L	3,543,744	3,517,322	0	2,094,400	2,971,552	15,590,678	2,871	0
26. Missouri MO	L	367,031	240,392	0	683,407	(1,642,615)	25,310,375	184	0
27. Montana MT	L	2,748,186	2,881,020	0	290,745	693,536	5,186,640	3,543	0
28. Nebraska NE	L	318,435	285,807	0	5,158,291	2,038,923	11,482,320	164	0
29. Nevada NV	L	62,323	(42,041)	0	1,929,713	7,252,403	18,445,738	0	0
30. New Hampshire NH	L	34,722	53,635	0	4,240,350	2,696,611	8,745,943	20	0
31. New Jersey NJ	L	431,112	338,341	0	5,811,818	1,796,695	39,072,517	205	0
32. New Mexico NM	L	17,247,395	16,749,667	0	9,161,487	18,624,447	38,951,770	16,207	0
33. New York NY	L	2,460,108	5,279,889	0	24,870,953	(7,816,222)	170,299,128	1,665	0
34. North Carolina NC	L	291,681	74,749	156	297,606	(1,171,110)	16,232,785	79	0
35. North Dakota ND	L	19,591,562	18,006,100	0	8,960,713	13,759,851	22,087,934	5,378	0
36. Ohio OH	L	7,733,130	7,291,957	0	8,951,607	9,967,924	26,029,054	3,233	0
37. Oklahoma OK	L	16,074,480	16,029,752	0	17,027,208	12,006,965	35,099,252	587	0
38. Oregon OR	L	224,398	63,514	0	249,516	698,111	7,213,412	58	0
39. Pennsylvania PA	L	18,859,024	18,466,226	0	24,794,565	24,844,329	71,632,763	11,566	0
40. Rhode Island RI	L	1,641	(114)	0	162,141	149,995	3,716,306	0	0
41. South Carolina SC	L	74,903	(55,954)	1	1,880,451	(274,622)	7,666,707	13	0
42. South Dakota SD	L	299,465	199,281	0	298,161	647,012	8,783,329	194	0
43. Tennessee TN	L	185,043	84,530	10	2,398,166	618,365	26,761,988	53	0
44. Texas TX	L	142,386,501	141,546,227	0	80,764,270	147,164,750	318,293,941	119,934	0
45. Utah UT	L	2,895,410	2,636,715	0	924,034	1,099,850	8,223,764	4,563	0
46. Vermont VT	L	3,059	3,657	0	28,272	(453,180)	2,428,273	1	0
47. Virginia VA	L	559,600	(324,320)	0	955,417	(1,475,897)	23,089,398	385	0
48. Washington WA	L	384,066	233,430	0	12,562,745	(933,684)	16,754,546	187	0
49. West Virginia WV	L	17,592,596	16,382,839	0	14,777,345	17,988,581	18,111,514	7,297	0
50. Wisconsin WI	L	615,509	8,647	807	8,338,044	4,540,772	46,590,666	124	0
51. Wyoming WY	L	14,644,372	14,089,688	0	4,619,401	6,900,957	22,590,406	12,435	0
52. American Samoa AS	N	0	0	0	0	0	0	0	0
53. Guam GU	L	460	1,805	0	0	(975)	3,824	0	0
54. Puerto Rico PR	L	2,566	(20,941)	0	0	229,065	1,214,559	0	0
55. US Virgin Islands VI	L	0	22,579	0	0	(30,530)	83,675	0	0
56. Northern Mariana Islands MP	N	0	0	0	0	0	0	0	0
57. Canada CAN	L	90,268,935	92,642,820	0	70,547,896	36,235,822	194,438,591	0	0
58. Aggregate Other Alien OT	XXX	2,138,403	1,899,301	0	1,304,082	1,336,296	8,657,561	0	0
59. Totals	XXX	436,852,172	430,678,154	93,561	441,715,862	341,586,260	1,889,320,205	246,731	0
DETAILS OF WRITE-INS									
58001. BMU Bermuda	XXX	1,194,768	896,997	0	0	0	0	0	0
58002. SGP Singapore	XXX	456,592	465,649	0	11,072	(126,078)	30,838	0	0
58003. CYM Cayman Islands	XXX	425,992	406,549	0	0	0	0	0	0
58998. Summary of remaining write-ins for Line 58 from overflow page	XXX	61,052	130,106	0	1,293,010	1,462,374	8,626,723	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above)	XXX	2,138,403	1,899,301	0	1,304,082	1,336,296	8,657,561	0	0

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

1 Fire - Location of property; 2 Allied Lines - Location of property; 3 Farmowners - Location of property; 4 Homeowners - Location of property; 5 CMP - Location of property; 8 Ocean Marine - Address of insured or state of principal exposure, except builders risks which are allocated on location of risk; 9 Inland Marine - Location of insured or state of principal exposure; 10 Financial guaranty - Location of risk; 11 Medical malpractice - Location of risk; 12 Earthquake - Location of property; 13 Group A&H - Location of risk; 15 Other A&H – Location of insured; 16 Workers' compensation - Location of employee's workplace; 17 Other liability - Location of risk; 18 Products Liability - Location of risk; 19 Auto liability - Location of garage; 21 Auto physical damage - Location of garage; 22 Aircraft - Location of airport from which insured's aircraft operates; 23 Fidelity - Location of insured; 24 Surety – Contract Surety: Project location; All Other Surety: Obligee location; 26 Burglary and theft - Location of property; 27 Boiler and machinery - Location of property; 28 Credit - Location of risk; 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.

(a) Active Status Counts:

L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG..... 55

E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - See DSLI)..... 0

D - Domestic Surplus Lines Insurer (DSLI) - Reporting entities authorized to write surplus lines in the state of domicile..... 0

R - Registered - Non-domiciled RRGs..... 0

Q - Qualified - Qualified or accredited reinsurer..... 0

N - None of the above - Not allowed to write business in the state..... 2

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

The Travelers Companies, Inc.	Minnesota	41-0518860	… … Windamere III, LLC (99%)	Minnesota	41-2007089
… St. Paul Fire and Marine Insurance Company (24767) *	Connecticut	41-0406690	… Camperdown Corporation	Delaware	41-1762781
… … St. Paul Mercury Insurance Company (24791) *	Connecticut	41-0881659	… SPC Insurance Agency, Inc.	Minnesota	41-1888760
… … St. Paul Guardian Insurance Company (24775) *	Connecticut	41-0963301	… Aprilgrange Limited	United Kingdom	
… … St. Paul Surplus Lines Insurance Company (30481) *	Delaware	41-1230819	… F&G U.K. Underwriters Limited	United Kingdom	
… … The Travelers Casualty Company (41769) *	Connecticut	41-1435765	… Travelers Underwriting Agency Limited	United Kingdom	
… … Travelers Constitution State Insurance Company (41750) *	Connecticut	41-1435766	… Travelers Syndicate Management Limited *	United Kingdom	
… … Northbrook Holdings, Inc.	Delaware	51-0375653	… St. Paul Surety Europe Limited	United Kingdom	
… … … Discover Property & Casualty Insurance Company (36463) *	Connecticut	36-2999370	… Travelers Corporate Trustee Ltd.	United Kingdom	
… … … St. Paul Protective Insurance Company (19224) *	Connecticut	36-2542404	… Travelers London Limited	United Kingdom	
… … Discover Specialty Insurance Company (10213) *	Connecticut	52-1925132	… TCI Global Services, Inc.	Delaware	52-1965525
… … United States Fidelity and Guaranty Company (25887) *	Connecticut	52-0515280	… Travelers Management Limited	United Kingdom	
… … … Fidelity and Guaranty Insurance Underwriters, Inc. (25879) *	Wisconsin	52-0616768	… Travelers Insurance Company Limited *	United Kingdom	AA-1121375
… … … Fidelity and Guaranty Insurance Company (35386) *	Iowa	42-1091525	… … Travelers Insurance Designated Activity Company	Ireland	
… … … Laurel Village Fidelity Realty, Inc.	Maryland	52-1551225	… Simply Business Holdings Ltd	United Kingdom	
… … … … Laurel Village Joint Venture Partnership (50%)	Minnesota	41-1616702	… Simply Business Group Ltd	United Kingdom	
… … … … … Laurel Village I Limited Partnership (99%)	Minnesota	41-1542260	… Xbridge Holdings Limited	United Kingdom	
… … … … … Laurel Village II Limited Partnership (99%)	Minnesota	41-1542261	… Xbridge Acquisitions Limited	United Kingdom	
… … … … … Laurel Village III Limited Partnership (99%)	Minnesota	41-1542263	… Simply Business Holdings, Inc.	Delaware	
… … … … … Laurel Village IV Limited Partnership (99%)	Minnesota	41-1542264	… … Simply Business, Inc.	Massachusetts	
… … … … … Laurel Village Tower A Limited Partnership (99%)	Minnesota	41-1542266	… Xbridge Limited	United Kingdom	
… … … … … Laurel Village Tower B Limited Partnership (99%)	Minnesota	41-1593312	… 10762962 Canada Inc.	Canada	
… … … … … Laurel Village Tower C Limited Partnership (99%)	Minnesota	41-1542267	… … Zensurance Inc. (79.3%)	Canada	
… … … … … Laurel Village Swinford Limited Partnership (99%)	Minnesota	41-1542255	… … … Zensurance Brokers Inc.	Canada	
… … … USF&G Retail Associates GP, Inc.	Maryland	52-1704255	… Travelers Property Casualty Corp.	Connecticut	06-1008174
… … … … USF&G/Fidelity Retail Associates Limited Partnership (1%)	Maryland	52-1704256	… … Travelers Insurance Group Holdings Inc.	Delaware	06-1445591
… … … USF&G/Fidelity Retail Associates Limited Partnership (83.95%)	Maryland	52-1704256	… … … The Standard Fire Insurance Company (19070) *	Connecticut	06-6033509
… … … BMR Sports Properties, Inc.	Maryland	52-1852190	… … … … Standard Fire Properties, LLC	Delaware	06-6033509
… … … … Black Mountain Ranch Limited Partnership (1%)	Maryland	52-1573778	… … … … … Bayhill Restaurant II Associates (50%)	California	94-3097171
… … Black Mountain Ranch Limited Partnership (85%)	Maryland	52-1573778	… … … … Standard Fire UK Investments, LLC	Delaware	06-6033509
… … MMI Capital Trust I	Delaware	52-2073764	… … … … The Automobile Insurance Company of Hartford, Connecticut (19062) *	Connecticut	06-0848755
… … Promenade Partners, LLC	Delaware	41-0406690	… … … … … Auto Hartford Investments, LLC	Delaware	06-0848755
… … USF&G Capital I	Delaware	52-1953822	… … … … Travelers Personal Security Insurance Company (36145) *	Connecticut	06-1286264
… … USF&G Capital III	Delaware	52-2044075	… … … … Travelers Property Casualty Insurance Company (36161) *	Connecticut	06-1286274
… … 350 Market Street, LLC	Delaware	38-4046010	… … … … Travelers Personal Insurance Company (38130) *	Connecticut	36-3703200
… … Travelers Special Services Limited	United Kingdom		… … … … Travelers Texas MGA, Inc.	Texas	27-4469564
… … Yonkers Financing Corp.	Delaware	20-3033027	… … … … Oregon Evergreen Investor I, LLC	Delaware	06-6033509
… … English Turn Fidelity Realty, Inc.	Minnesota	52-1466734	… … … Travelers (Bermuda) Limited *	Bermuda	AA-3194119
… … … English Turn LLC (99%)	Minnesota	59-2635727	… … … Travelers Lloyds Management Company	Texas	20-4312440
… … … Fidelity English Turn Club LLC (99%)	Minnesota	59-2709441	… … … TPC Investments Inc.	Connecticut	06-1534005
… … English Turn LLC (1%)	Minnesota	59-2635727	… … … Travelers Casualty and Surety Company (19038) *	Connecticut	06-6033504
… … English Turn Realty Management, Inc.	Minnesota	52-1715225	… … … … Farmington Casualty Company (41483) *	Connecticut	06-1067463
… … … Fidelity English Turn Club LLC (1%)	Minnesota	59-2709441	… … … … … Travelers MGA, Inc.	Texas	75-2676034
… … 8527512 Canada Inc. (22.48%)	Canada		… … … … 8527512 Canada Inc. (77.52%)	Canada	
… … … The Dominion of Canada General Insurance Company *	Canada	AA-1560270	… … … … … The Dominion of Canada General Insurance Company *	Canada	AA-1560270
… … Fog City Fund, LLC (99%)	Minnesota	41-1985480	… … … … Travelers Insurance Company of Canada *	Canada	AA-1560039
… … Symmetry Growth Capital II, LLC	Minnesota	76-0753165	… … … … Travelers Casualty and Surety Company of America (31194) *	Connecticut	06-0907370
… … Upper Lake Growth Capital, LLC (99%)	Minnesota	41-1927945	… … … … … Travelers Global, Inc.	Delaware	47-2215437
… … Vesbridge Partners, LP (85%)	Minnesota	20-1222630	… … … … … … Travelers Brazil Holding LLC	Delaware	47-2215437
… … Windamere II, LLC (99%)	Minnesota	41-1963936	… … … … … … … Travelers Brazil Acquisition 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

… … … … … … … … … Junto Holding Brasil S.A. (49.5%)	Brazil		… … … … Tiercel, LLC	Delaware	06-0566050
… … … … … … … … … … Junto Resseguros S.A. *	Brazil	AA-2230021	… … … … … Redstart, LLC	Delaware	06-0566050
… … … … … … … … … … … Junto Controle de Riscos Ltda. (0.01%)	Brazil		… … … … The Travelers Home and Marine Insurance Company (27998) *	Connecticut	35-1838079
… … … … … … … … … … Junto Seguros S.A. *	Brazil	AA-2230002	… … … … The Travelers Lloyds Insurance Company (41262) *	Texas	76-0002592
… … … … … … … … … … … Junto Controle de Riscos Ltda. (99.99%)	Brazil		… … … … Travelers Marine, LLC	Delaware	06-0566050
… … … … … … … … … Junto Holding Latam S.A. (49.5%)	Brazil				
… … … … … … … … … … JMalucelli Travelers Seguros S.A. (51%) *	Colombia	AA-2330036			
… … … … … … … … … Travelers Participações em Seguros Brasil S.A.	Brazil				
… … … … … … … … … … Travelers Seguros Brasil S.A. *	Brazil	AA-2230022			
… … … … 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			
… … … … The Family Business Institute LLC	Delaware	06-6033504			
… … … … IHP Capital Partners Fund VIII, L.P. (97%)	Delaware	82-0925474			
… … … 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	AA-1120023			
… … … … 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			
… … … … TravCo Insurance Company (28188) *	Connecticut	35-1838077			
… … … … TINDY Foreign, Inc	Delaware	20-4403403			
… … … … Travelers Commercial Casualty Company (40282) *	Connecticut	95-3634110			
… … … … Travelers Distribution Alliance, Inc.	Delaware	62-1657094			
… … … … Travelers TLD, LLC	Delaware	06-0566050			

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* Denotes affiliated insurer
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