



**Deloitte & Touche LLP**

111 South Wacker Drive  
Chicago, IL 60606  
USA

Tel: 312-486-1200

Fax: 312-486-1200

[www.deloitte.com](http://www.deloitte.com)

The Audit Committee of the Boards of Directors of  
Trinity Universal Insurance Company and Certain Subsidiaries and Affiliates

The Management of  
Trinity Universal Insurance Company and Certain Subsidiaries and Affiliates

Dear Members of the Audit Committee of the Boards of Directors and Management:

We have audited, in accordance with auditing standards generally accepted in the United States of America, the combined statutory-basis financial statements of Trinity Universal Insurance Company and Certain Subsidiaries and Affiliates (the "Company") for the years ended December 31, 2018, and 2017, and have issued our report thereon dated May 30, 2019. In connection therewith, we advise you as follows:

1. We are independent certified public accountants with respect to the Company and conform to the standards of the accounting profession as contained in the Code of Professional Conduct and pronouncements of the American Institute of Certified Public Accountants, the rules and regulations of the insurance departments of the states of domicile including Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin, and the Rules of Professional Conduct of the Illinois and Indiana Boards of Public Accountancy.
2. The engagement managing director and engagement manager, who are certified public accountants, have 18 years and 5 years, respectively, of experience in public accounting and are experienced in auditing insurance enterprises. Members of the engagement team, most of whom have had experience in auditing insurance enterprises and 67 percent of whom are certified public accountants, were assigned to perform tasks commensurate with their training and experience.
3. We understand that the Company intends to file its audited combined statutory-basis financial statements and our report thereon with the insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin insurance departments (which are domiciliary states of the insurance companies included in the combined statutory-basis financial statements) and other state insurance departments in states in which the Company is licensed and that the insurance commissioners of those states will be relying on that information in monitoring and regulating the statutory-basis financial condition of the Company.

While we understand that an objective of issuing a report on the combined statutory-basis financial statements is to satisfy regulatory requirements, our audit was not planned to satisfy all objectives or responsibilities of insurance regulators. In this context, the Company and insurance commissioners should understand that the objective of an audit of combined statutory-basis financial statements in accordance with auditing standards generally accepted in the United States of America is to form an opinion and issue a report on whether the combined statutory-basis financial statements present fairly, in all material respects, the admitted assets, liabilities, and capital and surplus, results of operations and cash flows in accordance with accounting practices prescribed or permitted by the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin insurance departments. Consequently, under auditing standards generally accepted in the United States of America, we have the responsibility, within the inherent limitations of the auditing process, to plan and perform our audit to obtain reasonable assurance regarding whether the combined statutory-basis financial statements are free from material misstatement, whether due to error or fraud, and to exercise due professional care in the conduct of the audit. The Company is not required to have, nor were we engaged to perform, an audit of internal control over financial reporting. Our audit included consideration of internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control over financial reporting. The concept

of selective testing of the data being audited, which involves judgment both as to the number of transactions to be audited and the areas to be tested, has been generally accepted as a valid and sufficient basis for an auditor to express an opinion on financial statements. Audit procedures that are effective for detecting errors, if they exist, may be ineffective for detecting misstatements resulting from fraud. Because of the characteristics of fraud, particularly those involving concealment and falsified documentation (including forgery), a properly planned and performed audit may not detect a material misstatement resulting from fraud. In addition, an audit does not address the possibility that material misstatements may occur in the future. Also, our use of professional judgment and the assessment of materiality for the purpose of our audit mean that matters may exist that would have been assessed differently by insurance commissioners.

It is the responsibility of the management of the Company to adopt sound accounting policies, to maintain an adequate and effective system of accounts, and to establish and maintain internal control that will, among other things, provide reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and are recorded properly to permit the preparation of financial statements in conformity with accounting practices prescribed or permitted by the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin Insurance departments.

The Insurance Commissioners should exercise due diligence to obtain whatever other information that may be necessary for the purpose of monitoring and regulating the combined statutory basis financial position of insurers and should not rely solely on the independent auditors' report.

4. We will retain the working papers prepared in the conduct of our audit until the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin insurance departments have filed a Report of Examination covering 2018, but no longer than seven years. After notification to the Company, we will make the working papers available for review by the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin insurance departments or its delegates, at the offices of the insurer, at our offices, at the offices of the departments of insurance, or at any other reasonable place designated by the Insurance Commissioners. Furthermore, in the conduct of the aforementioned periodic review by the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin insurance departments, photocopies of pertinent audit working papers may be made (under the control of Deloitte & Touche LLP) and such copies may be retained by the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon, Indiana, Ohio and Wisconsin insurance departments.
5. The engagement managing director has served in this capacity with respect to the Company since 2018, is licensed by the Illinois Board of Examiners, and is a member in good standing of the American Institute of Certified Public Accountants.
6. To the best of our knowledge and belief, we are in compliance with the requirements of section 7 of the National Association of Insurance Commissioners' ("NAIC") *Model Rule (Regulation) Requiring Annual Audited Financial Reports* regarding qualifications of independent certified public accountants and in case of Wisconsin are not subject to disqualification due to entering into an indemnification agreement with the Company.

This letter is intended solely for the information and use of The Audit Committee of the Boards of Directors and management of Trinity Universal Insurance Company and Certain Subsidiaries and Affiliates and for filing with the respective governing insurance departments of the Company's insurance entities, including the Texas, Alabama, Illinois, Louisiana, Missouri, New York, Oregon,

Indiana, Ohio and Wisconsin insurance departments and other state insurance departments to whose jurisdiction the Company is subject and is not intended to be and should not be used by anyone other than these specified parties.

*Deloitte + Touche LLP*

May 30, 2019