

REPORT ON EXAMINATION

OF

KINGSTONE INSURANCE COMPANY

AS OF

DECEMBER 31, 2018

DATE OF REPORT

APRIL 30, 2020

EXAMINER

LEON TAMBUE

TABLE OF CONTENTS

<u>ITEM</u>	<u>PAGE NO.</u>
1. Scope of examination	2
2. Description of Company	3
A. Corporate governance	4
B. Territory and plan of operation	5
C. Reinsurance ceded	6
D. Holding company system	8
E. Significant ratios	10
F. Accounts and records	10
3. Financial statements	11
A. Balance sheet	11
B. Statement of income	13
C. Capital and surplus	14
D. Analysis of changes to surplus	14
E. Analysis of changes to income	14
4. Losses and loss adjustment expenses	15
5. Subsequent events	16
6. Compliance with prior report on examination	17
7. Summary of comments and recommendations	18



Department of Financial Services

ANDREW M. CUOMO
Governor

LINDA A. LACEWELL
Superintendent

April 30, 2020

Honorable Linda A. Laceywell
Superintendent
New York State Department of Financial Services
Albany, New York 12257

Madam:

Pursuant to the requirements of the New York Insurance Law, and in compliance with the instructions contained in Appointment Number 31962 dated July 30th, 2019, attached hereto, I have made an examination into the condition and affairs of Kingstone Insurance Company as of December 31, 2018, and submit the following report thereon.

Wherever the designation “the Company” appears herein without qualification, it should be understood to indicate Kingstone Insurance Company.

Wherever the term “Department” appears herein without qualification, it should be understood to mean the New York State Department of Financial Services.

The examination was conducted at the Company’s home office located at 15 Joys Lane, Kingston, NY 12401.

1. SCOPE OF EXAMINATION

The Department has performed an examination of Kingstone Insurance Company, a multi-state insurer. The previous examination was conducted as of December 31, 2015. This examination covered the three-year period from January 1, 2016 through December 31, 2018. Transactions occurring subsequent to this period were reviewed where deemed appropriate by the examiner.

This examination was conducted in accordance with the National Association of Insurance Commissioners (“NAIC”) Financial Condition Examiners Handbook, which requires that we plan and perform the examination to evaluate the financial condition and identify current and prospective risks of the Company by obtaining information about the Company including corporate governance, identifying and assessing inherent risks within the Company and evaluating system controls and procedures used to mitigate those risks. This examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation, management’s compliance with New York laws, statutory accounting principles, and annual statement instructions.

This examination report includes, but is not limited to, the following:

- Company history
- Management and control
- Territory and plan of operation
- Reinsurance
- Holding company description
- Financial statement presentation
- Loss review and analysis
- Significant subsequent events
- Summary of recommendations

A review was also made to ascertain what action was taken by the Company with regard to the recommendations contained in the prior report on examination.

This report on examination is confined to financial statements and comments on those matters that involve departures from laws, regulations or rules, or that are deemed to require explanation or description.

2. DESCRIPTION OF COMPANY

The Company was organized in 1886 under the name of the Co-operative Fire Insurance Company of Greene, Schoharie and Delaware Counties. It was the first advanced premium cooperative fire insurance company in New York. In 1922, the Company changed its name to The Co-operative Fire Insurance Company of Catskill and in 1935, the Company assumed all of the assets and liabilities of its affiliate, the Commercial Mutual Fire Insurance Company of Greene County. In 1976, the merged company adopted the name of Commercial Mutual Insurance Company (“CMIC”).

On April 1, 1998, Eagle Insurance Company (“Eagle”) obtained a controlling interest of the Company by investing \$3 million in the form of a Section 1307 surplus note. On March 12, 1999, Eagle purchased another surplus note in the amount of \$750,000.

On January 31, 2006, the surplus notes with a principal amount of \$3,750,000 were sold by Eagle to the DCAP Group, Inc., currently known as Kingstone Companies, Inc. (“KCI”).

In March 2007, the Company’s board of directors approved a resolution to convert (demutualize) CMIC from an advance premium cooperative insurance company to a domestic stock property and casualty insurance company pursuant to Section 7307 of the New York Insurance Law. The charter, by-laws and plan of conversion were submitted to the Department and approved on April 15, 2009. On June 8, 2009, the eligible policyholders of CMIC voted in favor of the conversion by the required two-third majority. On June 30, 2009, the Department gave final approval of the demutualization to become effective July 1, 2009. Upon the effective date of the conversion, CMIC’s name was changed to Kingstone Insurance Company.

Pursuant to the plan of conversion, KCI acquired a 100% equity interest in the Company in consideration of the exchange of the \$3,750,000 principal dollar amount of surplus notes of CMIC.

Accordingly, on July 1, 2009, the Company issued 3,000 shares of common stock to KCI and the \$3,750,000 surplus note was discharged. In addition, KCI forgave all accrued and unpaid interest on the surplus notes as of the date of conversion.

A. Corporate Governance

Pursuant to the Company's charter and by-laws, management of the Company is vested in a board of directors consisting of not less than seven nor more than eighteen members. The board meets four times during each calendar year. At December 31, 2018, the board of directors was comprised of the following eight members:

<u>Name and Residence</u>	<u>Principal Business Affiliation</u>
Victor J. Brodsky Woodmere, NY	Executive Vice President, Chief Financial Officer and Chief Risk Officer, Kingstone Insurance Company
Barry B. Goldstein Hewlett, NY	Chairman of the Board, Chief Executive Officer and Chief Investment Officer, Kingstone Insurance Company
Karl J. Houseknecht Kingston, NY	Treasurer, Kingstone Insurance Company
Jeannette Lobosco Rhinebeck, NY	Vice President, Kingstone Insurance Company
John D. Reiersen Port Jefferson, NY	Retired from Kingstone Insurance Company
Thomas G. Seccia Kingston, NY	Secretary, Chief Administrating Officer and General Counsel, Kingstone Insurance Company
Dale A. Thatcher Milford, PA	President, Kingstone Insurance Company
Benjamin A. Walden Centerport, NY	Executive Vice President and Chief Actuary, Kingstone Insurance Company

As of December 31, 2018, the principal officers of the Company were as follows:

<u>Name</u>	<u>Title</u>
Barry B. Goldstein	Chairman of the Board, Chief Executive Officer, and Chief Investment Officer
Dale A. Thatcher	President
Thomas G. Seccia	Secretary, Chief Administrative Officer and General Counsel
Victor J. Brodsky	Executive Vice President and Chief Financial Officer
Karl J. Houseknecht	Treasurer
Benjamin A. Walden	Executive Vice President and Chief Actuary

B. Territory and Plan of Operation

As of December 31, 2018, the Company was licensed to write business in nine states: New York, New Jersey, New Hampshire, Connecticut, Maine, Massachusetts, Pennsylvania, Rhode Island and Texas. The Company became licensed in the states of Maine and New Hampshire in 2018 and rescinded its license with the state of Texas in 2019.

As of the examination date, the Company was authorized to transact the kinds of insurance as defined in the following numbered paragraphs of Section 1113(a) of the New York Insurance Law:

<u>Paragraph</u>	<u>Line of Business</u>
4	Fire
5	Miscellaneous Property
6	Water Damage
7	Burglary and Theft
8	Glass
9	Boiler and Machinery
12	Collision
13	Personal Injury Liability
14	Property Damage Liability
19	Motor Vehicle and Aircraft Physical Damage
20	Marine and Inland Marine (inland only)

Based upon the lines of business for which the Company is licensed and the Company's current capital structure, and pursuant to the requirements of Articles 13 and 41 of the New York Insurance Law, the Company is required to maintain a minimum surplus to policyholders in the amount of \$1,700,000.

The following schedule shows the direct and assumed premiums written by the Company for the period under examination:

<u>Calendar Year</u>	<u>Direct Premiums</u>	<u>Assumed Premiums</u>	<u>Total Gross Premiums</u>
2016	\$103,191,994	\$28,522	\$103,220,516
2017	\$121,575,180	\$22,847	\$121,598,027
2018	\$146,716,469	\$ 1,004	\$146,717,473

The Company has been pursuing business expansion, mostly in the coastal area, in the past five years. In 2017, the Company started writing business in the states of New Jersey and Rhode Island, and in 2018, in the state of Massachusetts. The majority (93.7%) of the Company's 2018 business is written in New York, with the remainder written in New Jersey, Rhode Island, Pennsylvania, and Massachusetts. The four largest lines of business, by percentage of total 2018 direct written premium, are homeowners' multiple peril (60%), commercial multiple peril (11%), fire (12%), and auto physical damage (7%). Most of the business originated through 534 independent agents and brokers. Assumed reinsurance consists entirely of the Company's participation in a mandatory pool, The New York Special Risk Distribution Program (NYSRDP).

The Company maintains a branch office in Valley Stream, New York.

C. Reinsurance Ceded

The Company has structured its ceded reinsurance program as follows:

<u>Type of Treaty</u>	<u>Cession</u>
<u>Personal Lines Excess of Loss</u> (Two Layers)	\$2,500,000 in excess of \$1,000,000 per risk retention which is subject to a 20% quota share that reduces the Company's net retention to \$800,000 per risk. There is a combined limit with the Personal Lines and Commercial Lines Excess of Loss of \$12,000,000 all losses.
<u>Commercial Lines Excess of Loss</u> (Two Layers)	\$3,750,000 in excess of \$750,000 ultimate net loss, any one risk, each loss, any one loss occurrence. There is a combined limit with the Personal Lines and Commercial Lines Excess of Loss of \$12,000,000 all losses.

<u>Property Catastrophe Excess of Loss (4 Layers)</u>	\$445,000,000 in excess of \$5,000,000, each occurrence which is subject to a 20% quota share that reduces the Company's net retention to \$4 million.
<u>Personal Lines Quota Share</u>	20% of net liability; limit to \$10,000,000 as respects all catastrophic events commencing during the term of the contract, and \$5,000,000 from an act of terrorism.
<u>Personal and Commercial Umbrella Quota Share</u>	90% of net liability for the first \$1,000,000; and 100% for limit in excess of the first \$1,000,000 any one policy any one occurrence.
<u>Private Flood Quota Share</u>	80% of gross liability with a limit of 569% of the gross written premium or \$2.5 million, whichever is greater. Covers of policies classified by the Company as X zone flood specific business.
<u>Homeowners Equipment Breakdown</u>	100% of up to \$50,000 any one accident, any one policy.

The Company ceded to authorized, unauthorized, and certified reinsurers during the period under examination. The majority of the business, a total of \$21.6 million, was ceded to authorized reinsurers. Approximately 42% of reinsurance recoverables are due from one authorized reinsurer. This reinsurer has a financial strength rating of A from A.M. Best. In 2018, cession to unauthorized and certified reinsurers represented 12.3% and 7.5%, respectively, of the total business ceded. It is the Company's policy to obtain the appropriate collateral for its cessions to unauthorized and certified reinsurers.

All significant ceded reinsurance agreements in effect as of the examination date were reviewed and found to contain the required clauses, including an insolvency clause meeting the requirements of Section 1308 of the New York Insurance Law.

Examination review of the Schedule F data, reported by the Company in its filed annual statement, was found to accurately reflect its material reinsurance transactions. Additionally, management has represented that all material ceded reinsurance agreements transfer both underwriting and timing risk as set forth in NAIC Accounting Practices and Procedures Manual, Statement of Statutory Accounting Principles ("SSAP") No. 62R. Representations were supported by an attestation from the Company's Chief Executive Officer and Chief Financial Officer. Additionally, examination review indicated that the Company was not a party to any finite reinsurance agreements. All ceded reinsurance agreements were accounted for utilizing reinsurance accounting as set forth in SSAP No. 62R.

D. Holding Company System

The Company is a wholly owned subsidiary of KCI, a public company incorporated in Delaware.

KCI offers property and casualty insurance products to individual and small businesses through its subsidiary, Kingstone Insurance Company. The Company has two direct subsidiaries and one indirect subsidiary in its holding company system at December 31, 2018, each of which is described below:

CMIC Properties, Inc. (“CPI”)

CPI was organized in 2003 and is a wholly owned subsidiary of the Company. CPI owns 100% of 15 Joys Lane, LLC (“the LLC”). The LLC in-turn owns 100% of the Company’s home office building located at 15 Joys Lane, Kingston, New York 12401, along with an adjacent building at 9 Joys Lane, Kingston, New York, that is used as a guest house. The LLC also owns a vacant adjacent lot at 27 Joys Lane, Kingston, New York. The three properties were appraised in January 2018 for \$2,705,000. The value of the LLC is carried as the primary asset on the books of CPI. Since CPI is a wholly owned subsidiary of the Company, CPI is valued on the books of the Company, using the equity method, at \$1.852 million. CPI has no other function but to manage properties owned by the LLC.

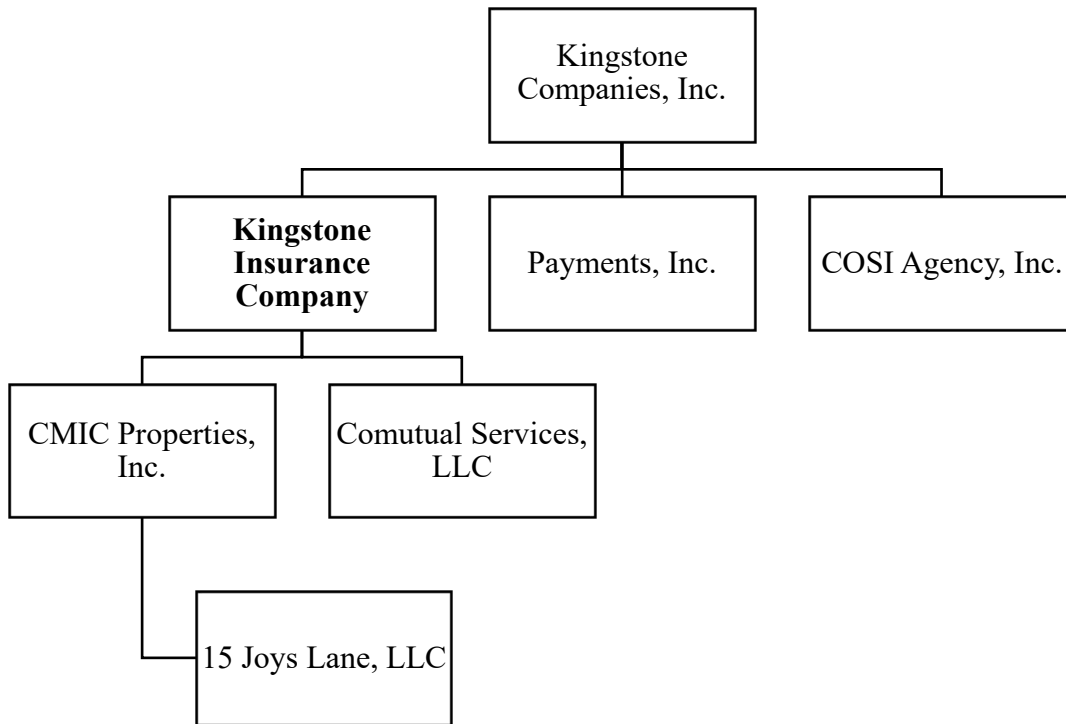
In 2003, the Company and the LLC entered into a 10-year lease of the Company’s home office that lease was renewed in 2012 and extended through February 28, 2023 with rent payable in equal monthly installments of \$13,325.

Comutual Services, LLC

Comutual Services, LLC, a wholly owned subsidiary of the Company, is licensed as an insurance broker in New York. This subsidiary has a brokerage agreement in place with the Company.

A review of the Holding Company Registration Statements filed with this Department indicated that such filings were complete and were filed in a timely manner pursuant to Article 15 of the New York Insurance Law and Department Regulation 52.

The following is an abridged chart of the holding company system at December 31, 2018:



Holding Company Agreements

At December 31, 2018, the Company was party to the following agreement with other members of its holding company system:

Tax Allocation Agreement

This agreement became effective January 1, 2012 between the Company and KCI. The agreement was non-objected to in a letter from the Department dated July 18, 2012. The agreement provides for the calculation of the Company's tax liability on a separate return basis. Settlements under the agreement shall be made within thirty days following the later of the filing of the applicable consolidated tax return or the receipt of a tax refund.

E. Significant Ratios

The Company's operating ratios, computed as of December 31, 2018, fall within the benchmark ranges set forth in the Insurance Regulatory Information System of the NAIC.

<u>Operating Ratios</u>	<u>Result</u>
Net premiums written to policyholders' surplus	137%
Adjusted liabilities to liquid assets	61%
Two-year overall operating	89%

Underwriting Ratios

The underwriting ratios presented below are on an earned/incurred basis and encompass the three-year period covered by this examination:

	<u>Amount</u>	<u>Ratio</u>
Losses and loss adjustment expenses incurred	\$131,402,402	54.26%
Other underwriting expenses incurred	106,339,473	43.91
Net underwriting gain (loss)	<u>4,431,772</u>	<u>1.83</u>
Premiums earned	<u>\$242,173,647</u>	<u>100.00%</u>

The Company's reported risk-based capital ("RBC") score was 1,009.60% at December 31, 2018. The RBC is a measure of the minimum amount of capital appropriate for a reporting entity to support its overall business operations in consideration of its size and risk profile. An RBC score of 200% or below can result in regulatory action.

F. Accounts and Records

Compliance with NAIC Annual Statement Instructions

NAIC Annual Statement Instructions require that the Company provide answers to general interrogatories in the annual statement; as such, the Company answered "Yes" to Part 1 – Common Interrogatories No. 1.1, which required the Company to complete Schedule Y, Parts 1, 1A and 2. The Company failed to properly complete Schedule Y.

It is recommended that the Company implement controls to ensure that it completes its annual statement filing in accordance with the NAIC Annual Statement Instructions.

3. FINANCIAL STATEMENTS

A. Balance Sheet

The following shows the assets, liabilities and surplus as regards policyholders as of December 31, 2018, as reported by the Company:

Assets

	<u>Assets</u>	<u>Nonadmitted</u> <u>Assets</u>	<u>Net Admitted</u> <u>Assets</u>
Bonds	\$152,604,075	\$ 0	\$152,604,075
Preferred stocks (stocks)	6,152,956	0	6,152,956
Common stocks (stocks)	10,479,578	200	10,479,378
Cash, cash equivalents and short-term Investments	25,105,302	0	25,105,302
Other invested assets	1,855,225	0	1,855,225
Investment income due and accrued	1,687,874	0	1,687,874
Uncollected premiums and agents' balances in the course of collection	1,442,728	255,230	1,187,498
Deferred premiums, agents' balances and installments booked but deferred and not yet due	12,774,100	0	12,774,100
Amounts recoverable from reinsurers	4,453,298	0	4,453,298
Other amounts receivable under reinsurance Contracts	(1,580,893)	0	(1,580,893)
Net deferred tax asset	3,271,440	0	3,271,440
Electronic Data Processing equipment and Software	3,620,942	3,506,148	114,794
Receivables from parent, subsidiaries and Affiliates	1,235,623	0	1,235,623
Equity in NYPIUA	(148,546)	0	(148,546)
Other assets	<u>(144,346)</u>	<u>139,128</u>	<u>5,218</u>
Total assets	<u>\$223,098,048</u>	<u>\$3,900,706</u>	<u>\$219,197,342</u>

Liabilities, surplus and other fundsLiabilities

Losses and Loss Adjustment Expenses	\$40,525,858
Commissions payable, contingent commissions and other similar charges	4,044,948
Other expenses (excluding taxes, licenses and fees)	1,189,791
Taxes, licenses and fees (excluding federal and foreign income taxes)	(184,182)
Current federal and foreign income taxes	(1,353,963)
Unearned premiums	72,789,561
Advance premium	2,107,629
Ceded reinsurance premiums payable (net of ceding commissions)	352,483
Funds held by company under reinsurance treaties	426,080
Amounts withheld or retained by company for account of others	172,055
Provision for reinsurance (including \$29,484 certified)	149,532
Payable to parent, subsidiaries and affiliates	46,264
NYSRDP Premium Deficiency Reserve	168
Balance due to NYPAP and NYSRDP	<u>185,174</u>
Total liabilities	\$120,451,398

Surplus and other funds

Common capital stock	\$ 3,000,000
Gross paid in and contributed surplus	66,750,000
Unassigned funds (surplus)	<u>28,995,944</u>
Surplus as regards policyholders	<u>98,745,944</u>
Total liabilities, surplus and other funds	<u>\$219,197,342</u>

Note: The Internal Revenue Service has completed its audit of the Company's consolidated federal income tax return through tax year 2016. All material adjustments, if any, made subsequent to the date of examination and arising from said audit, are reflected in the financial statements included in this report. The examiner is unaware of any potential exposure of the Company to any tax assessment and no liability has been established herein relative to such contingency.

B. Statement of Income

The net income for the examination period as reported by the Company was \$20,921,367, as detailed below:

Underwriting Income

Premiums earned		\$242,173,647
Deductions:		
Losses and loss adjustment expenses incurred	\$120,270,402	
Other underwriting expenses incurred	<u>106,339,473</u>	
Total underwriting deductions		<u>226,609,875</u>
Net underwriting gain or (loss)		\$15,563,772

Investment Income

Net investment income earned	\$13,295,635	
Net realized capital gain	<u>354,494</u>	
Net investment gains or (losses)		13,650,129

Other Income

Net gain or (loss) from agents' or premium balances charged off	\$(488,599)	
Finance and service charges not included in premiums	3,964,657	
Aggregate write-ins for miscellaneous income	<u>44,650</u>	
Total other income		<u>3,520,708</u>
Net income before federal and foreign income taxes		\$32,734,609
Federal and foreign income taxes incurred		<u>11,813,242</u>
Net income		<u>\$20,921,367</u>

C. Capital and Surplus

Surplus as regards policyholders increased \$59,672,983 during the three-year examination period January 1, 2016 through December 31, 2018, as reported by the Company, detailed as follows:

Surplus as regards policyholders as reported by the Company as of December 31, 2015			\$39,072,961
	<u>Gains in Surplus</u>	<u>Losses in Surplus</u>	
Net income	\$20,921,367		
Net unrealized capital gains or losses		\$1,494,522	
Change in net deferred income tax	209,891		
Change in nonadmitted assets		2,437,464	
Change in provision for reinsurance		76,289	
Surplus adjustments paid in	51,000,000		
Dividends to stockholders	<u>0</u>	<u>8,450,000</u>	
Net increase (decrease) in surplus	\$72,131,258	\$12,458,275	<u>59,672,983</u>
Surplus as regards policyholders as reported by the Company as of December 31, 2018			<u>\$98,745,944</u>

D. Analysis of Changes to Surplus

Surplus as regards policyholders as of December 31, 2018, as reported by the Company	\$98,745,944
Surplus increase (decrease) due to examination change in losses and loss adjustment expense reserves	<u>(11,132,000)</u>
Surplus as regards policyholders as of December 31, 2018, per report on examination	<u>\$87,613,944</u>

E. Analysis of Changes to Income

Net income for the examination period, as reported by the Company	\$20,921,367
Income increase (decrease) due to examination change in losses and loss adjustment expense reserves	<u>(11,132,000)</u>
Net income for the examination period, after examination adjustments	<u>\$ 9,789,367</u>

Gross paid in and contributed surplus and/or capital paid in increased by \$66,750,000 during the examination period, as follows:

<u>Year</u>	<u>Description</u>	<u>Amount</u>
2015	Beginning gross paid in and contributed surplus	\$15,750,000
2016	Surplus contribution	\$ 3,000,000
2017	Surplus contribution	<u>48,000,000</u>
	Total surplus contributions	<u>51,000,000</u>
2018	Ending gross paid in and contributed surplus	<u>\$66,750,000</u>

In 2017, KCI provided the Company \$48 million to support the Company's continued expansion into the coastal markets.

4. LOSSES AND LOSS ADJUSTMENT EXPENSES

The examination liability for the captioned items of \$51,658,000 is \$11,132,000 more than the \$40,526,000 reported by the Company in its 2018 filed Annual Statement. The Company's reserves were mainly in the homeowners and commercial peril lines of business. The deficiencies were mainly in the commercial multiple peril loss and defense and cost containment reserves. The examination analysis of the loss and loss adjustment expense reserves was conducted in accordance with generally accepted actuarial principles and statutory accounting principles, including SSAP No. 55.

Section 1303 of the New York Insurance Law states:

“Every insurer shall...maintain reserves in an amount estimated in the aggregate to provide for the payment of all losses or claims incurred on or prior to the date of statement, whether reported or unreported, which are unpaid as of such date and for which such insurer may be liable, and also reserves in an amount estimated to provide for the expenses of adjustment or settlement of such losses or claims”.

Further, Paragraph 10 of SSAP No. 55 states:

“The liability for claim reserves and claim liabilities, unpaid losses, and loss/claim adjustment expenses shall be based upon the estimated ultimate cost of settling the claims (including the effects of inflation and other societal and economic factors), using past experience adjusted for current trends, and any other factors that would modify past experience”.

As the Company's reported one-year adverse development of \$11.13 million as of December 31, 2019 reflects most of the Department's indicated reserve deficiency, no further reserve adjustment is indicated.

It is recommended that the Company maintain adequate reserves, pursuant to the provisions of Section 1303 of the New York Insurance Law and Paragraph 10 of SSAP No. 55.

5. SUBSEQUENT EVENTS

1. In December 2019, the Company received a surplus contribution of \$3,295,932 from its parent, KCI.
2. On March 11, 2020, the World Health Organization declared an outbreak of a novel coronavirus ("COVID-19") pandemic. The risks and uncertainties surrounding the COVID-19 pandemic may impact the Company's, and its competitors', operational and financial performance. The extent of the impact of the COVID-19 pandemic on the Company's operational and financial performance will depend on certain developments, including the duration and spread of the outbreak, regulatory decisions, and the impact on the financial markets. All of these developments are uncertain and cannot be predicted. The related financial impact cannot be reasonably estimated at this time.

6. COMPLIANCE WITH PRIOR REPORT ON EXAMINATION

The prior report on examination contained four recommendations as follows (page numbers refer to the prior report):

<u>ITEM</u>	<u>PAGE NO.</u>
A. <u>Reinsurance</u>	
It was recommended that the Company comply with Department Circular Letter No. 5 (1988) and indicate in all reinsurance contracts that make reference to a novation that, prior to the implementation of a novation, the certificate of assumption on New York risks would have to be approved by the Superintendent.	10
The Company has complied with this recommendation.	
<u>Accounts and Records</u>	
B. It is recommended that the Company comply with Section 312 (b) of the New York Insurance Law and require each director sign the statement to	
i. confirm each has received and read the report on examination.	14
The Company has complied with this recommendation.	
It is recommended that the Company comply with Article VI Capital Stock, Section 1 – Stock Certificates of its by-laws and ensure that each	
ii. certificate representing shares state upon the face thereof the par value of each share represented by such certificate.	14
The Company has complied with this recommendation.	
It is recommended that the Company comply with the record retention requirements of Section 243.2 of New York Regulation 152.	
iii.	14
The Company has complied with this recommendation.	

7. SUMMARY OF COMMENTS AND RECOMMENDATIONS

<u>ITEM</u>		<u>PAGE NO.</u>
A.	<u>Accounts and Records</u>	
	It is recommended that the Company implement controls to ensure that it completes its annual statement filing in accordance with the NAIC Annual Statement Instructions.	10
B.	<u>Losses and Loss Adjustment Expenses</u>	
	It is recommended that the Company maintain adequate reserves, pursuant to the provisions of Section 1303 of the New York Insurance Law and Paragraph 10 of SSAP No. 55.	16

Respectfully submitted,

_____/S/
Leon Tambue
Senior Insurance Examiner

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

Leon Tambue, being duly sworn, deposes and says that the foregoing report, subscribed by him, is true to the best of his knowledge and belief.

_____/S/
Leon Tambue

Subscribed and sworn to before me
this _____ day of _____, 2020.

APPOINTMENT NO. 31962

NEW YORK STATE

DEPARTMENT OF FINANCIAL SERVICES

I, Linda A. Lacewell, Superintendent of Financial Services of the State of New York, pursuant to the provisions of the Financial Services Law and the Insurance Law, do hereby appoint:

Leon Tambue

as a proper person to examine the affairs of the

Kingstone Insurance Company

and to make a report to me in writing of the condition of said

COMPANY

with such other information as he shall deem requisite.

In Witness Whereof, I have hereunto subscribed by name
and affixed the official Seal of the Department
at the City of New York

this 30th day of July, 2019

LINDA A. LACEWELL
Superintendent of Financial Services



By:

Joan P. Riddell

Joan Riddell
Deputy Bureau Chief