NINETEENTH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

NUMBER:

leceouil



JAMES J. DONELON COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA

VERSUS

PRIDE OF CARROLL LIFE INSURANCE COMPANY

FILED:

DEPUTY CLERK BY DYCIEST

PETITION FOR REHABILITATION, INJUNCTIVE RELIEF AND RULE TO SHOW CAUSE

The petition of James J. Donelon, Commissioner of Insurance for the State of Louisiana ("Commissioner"), respectfully represents that:

Made defendant herein is Pride of Carroll Life Insurance Company ("PCLIC"), a Louisiana corporation, authorized and doing business in the state of Louisiana. PCLIC maintains its corporate registered office at 503 Sparrow Street, Lake Providence, Louisiana 71254.

2.

PCLIC is engaged in the business of insurance within the State of Louisiana as defined by La. R.S. 22:46, La. R.S. 22:47 and other applicable law and is deemed an insurer pursuant to La. R.S. 22:2002 and La. R.S. 22:2003.

3.

La. R.S. 22:2001 et seq., constitutes the sole and exclusive method of rehabilitation and liquidation of a Louisiana domiciled insurer.

4.

The Commissioner desires and is entitled to employ staff counsel of the Louisiana Department of Insurance to provide representation in all matters covered pursuant to La. R.S. 22:2001, et seq., in which the assets of an insurer's estate are less than one million dollars. La. 22:2018(B).

5.

After examination and review of the financial condition and affairs of PCLIC, the

Commissioner has determined that PCLIC is financially troubled and insolvent and in violation of the minimum capital surplus requirements of the Louisiana Insurance Code, as shown in the affidavit attached hereto and incorporated herein as Exhibit A. This provides sufficient grounds to justify the issuance of an order of rehabilitation and injunctive relief under La. R.S. 22:2006 and other applicable law.

6.

After examination and review of the financial condition and affairs of PCLIC, the Commissioner has determined that PCLIC has made unauthorized transfers of admitted assets to its affiliate, Brannum Funeral Home, in violation of R.S. 22:691.7. Exhibit B.

7.

The current operations of PCLIC endanger the interests of the creditors, policyholders and/or the public, as shown in the affidavit attached hereto and incorporated herein as Exhibit A. Therefore, the Commissioner has the power and authority to place PCLIC in rehabilitation.

8.

The further transaction of business by PCLIC would be hazardous to its policyholders, its creditors and/or the public, and any delay in action by the Commissioner would endanger the interests of its policyholders, its creditors and/or the public, as shown in the affidavit attached hereto and incorporated herein as Exhibit A.

9.

Inasmuch as PCLIC is deemed a domestic insurer in accordance with Louisiana law, and for the foregoing reasons, the Commissioner desires and is entitled to have this Court declare that PCLIC is in need of rehabilitation under the Louisiana Insurance Code and appoint the Commissioner as Rehabilitator of PCLIC and appoint Ralph Gaubert as Receiver of PCLIC. There is proper and sufficient basis for the following order pursuant to La. R.S. 22:2005(1) and (5).

10.

The Commissioner desires and is entitled to have this Court issue an order forthwith, without hearing, declaring that PCLIC is in need of rehabilitation by the Commissioner and empower the Commissioner with authority to take any action he deems necessary for the orderly rehabilitation of PCLIC pursuant to La. R.S. 22:2005, La. R.S. 22:2006, La. R.S. 22: 2007, La. R.S. 22:2008, and La. R.S. 22:2009.

It is therefore necessary that this Court, pursuant to La R.S. 22:2006, issue an order forthwith, without hearing, directing the Commissioner, the Receiver, his agents and/or employees to take possession and control of the property, business, affairs, bank accounts, safety deposit boxes, statutory deposits, computers, all primary and secondary storage media, social media (including, but not limited to Facebook and Twitter accounts), documents, claims files, records, software, electronic data, e-mail, websites, copyrights, trademarks, patents, book, records, accounts and other assets of PCLIC, including all real property, whether in the possession of PCLIC or its officers, directors, employees, managers, trustees, agents, adjustors, accountants, actuaries, attorneys, contractors, consultants, third party administrators, affiliates, or subsidiaries, and of the premises occupied by PCLIC for PCLIC's business and to rehabilitate same.

12.

The Commissioner further shows that he is entitled to be vested by operation of law with the title to all property, business, affairs, accounts, bank accounts, safety deposit boxes, statutory deposits, computers, all primary and secondary storage media, social media (including, but not limited to Facebook and Twitter accounts), documents, claims files, records and all other assets of PCLIC as of the date of the order of rehabilitation entered herein. La. R.S. 22:2008.

13.

The Commissioner further shows that he is entitled, under the provisions of La. R.S. 22:2006, to an injunction forthwith, without hearing, enjoining PCLIC and its policyholders, members, enrollees, officers, directors, employees, servants, managers, trustees, agents, adjustors, accountants, actuaries, attorneys, contractors, consultants, or third party administrators, from disposing of property or assets and from the transaction of business by PCLIC, except with the concurrence of the Commissioner until further order of this Court.

14.

The Commissioner further shows that he is entitled, under the provisions of La. R.S. 22:2006, to an injunction forthwith, without hearing, staying any and all persons and entities from obtaining preferences, judgments, attachments or other like liens or the making of any levy against PCLIC, its property and assets while in his possession and control.

The Commissioner further shows that he is entitled to the right to enforce contract performance by any party who had a contract with PCLIC and to permit such further operation of PCLIC as he may deem necessary to be in the best interests of policyholders, creditors and PCLIC.

16.

The Commissioner further shows that he is entitled to enjoin PCLIC from issuing any further policies and engaging in any further advertising or solicitation whatsoever.

17.

The Commissioner requests that following the entry of an order providing the relief requested herein, a Rule Nisi issue herein directed to PCLIC ordering PCLIC to appear and show cause on a date and time to be fixed by this Court why this Court should not find, order and declare that sufficient cause exists for the rehabilitation of PCLIC and further order and direct the Commissioner, the Receiver, his agents and/or employees to take and/or maintain possession of all the affairs, property, business, books, records, claim files, account, bank accounts, safety deposit boxes, statutory deposits, computers, all primary and secondary storage media, social media (including, but not limited to Facebook and Twitter accounts), documents, claims files, software, electronic data, e-mail, websites, copyrights, trademarks, patents, and all other assets of PCLIC, all real property and the premises occupied by PCLIC, whether in possession of PCLIC or its officers, directors, employees, managers, trustees, agents, adjustors, accountants, actuaries, attorneys, contractors, consultants, third party administrators, or any other person acting on behalf of PCLIC to conduct PCLIC's business and rehabilitate same according to law; and why the other relief prayed for and granted herein should not be continued.

18.

The Commissioner submits that service of the order of rehabilitation entered by the Court should be made forthwith and asks that Matthew Stewart, Norrie Falgoust, James Henry, and Rudy Babin be appointed as Process Servers for service of all process and further pleadings on PCLIC.

WHEREFORE, James J. Donelon, Commissioner of Insurance for the State of Louisiana, prays that this Petition for Rehabilitation and Injunctive Relief be accepted and filed and that an order issue forthwith, without hearing that provides the following immediate relief:

- 1) Finding that PCLIC is insolvent and that sufficient cause exists for the rehabilitation of PCLIC.
- 2) That PCLIC be placed into rehabilitation and that the Commissioner be appointed Rehabilitator for PCLIC and that Ralph Gaubert be appointed Receiver of PCLIC.
- That the Commissioner and/or the Receiver be authorized to employ and authorize the compensation of accountants, clerks, attorneys or such assistants as he deems necessary, and authorize the payment of the expenses of these proceedings and the necessary incidents thereof, as approved by the Court, to be paid out of the funds or assets of PCLIC in the possession of the Commissioner and/or Receiver or coming into PCLIC's possession.
- That the Commissioner be vested by operation of law with the title to all property, business, affairs, accounts, bank accounts, safety deposit boxes, statutory deposits, computers, all primary and secondary storage media, social media (including, but not limited to Facebook and Twitter accounts), documents, claims files, records and other assets of PCLIC as of the date of the order of rehabilitation entered herein.
- Directing the Commissioner, his agents and/or employees, to take possession and control of the property, business, affairs, bank accounts, safety deposit boxes, statutory deposits, computers, all primary and secondary storage media, social media (including, but not limited to Facebook and Twitter accounts), documents, claims files, software, electronic data, e-mail, websites, books, records, accounts, copyrights, trademarks, patents, and all other assets of PCLIC, including all real property, whether in the possession of PCLIC or its officers, directors, employees, managers, trustees, agents, adjustors, accountants, actuaries, attorneys, contractors, consultants, third party administrators, subsidiaries, affiliates, or agents, and of the premises occupied by PCLIC for its business, conduct all of the business and affairs of PCLIC, or so much thereof as he may deem appropriate, manage the affairs of PCLIC, and to rehabilitate same, until further order of this Court.
- Enjoining PCLIC, its policyholders, members, officers, directors, employees, managers, trustees, agents, adjustors, accountants, actuaries, attorneys, contractors, consultants, third party administrators, banks, savings and loan associations, and any other partnership, company or entity controlled by same and/or other persons acting for or on behalf of PCLIC, from disposing of the property, business, affairs, bank accounts, safety deposit boxes, statutory deposits, computers, all primary and secondary storage media, social media (including, but not limited to Facebook and Twitter accounts), documents, claims files, software, electronic data, e-mail, websites, books, records, accounts, and other assets of PCLIC, including all real property of PCLIC and from the transaction of its business except with the concurrence of the Commissioner, until further order of this Court.
- 7) Pursuant to La. R.S. 22:2006, an injunction be issued forthwith enjoining any person from obtaining preferences, judgments, attachments or other like liens or the making of any levy against PCLIC, its property and assets while in the Commissioner's possession and control.
- Pursuant to La. R.S. 22:2006, the Commissioner be immediately vested with and/or maintain the authority to enforce, for the benefit of the policyholders, members, and PCLIC, contract performance by any party who contracted with PCLIC, and for such other relief as the nature of the case and the interest of PCLIC's policyholders, members, creditors or the public may require.
- 9) The Commissioner be entitled to the right to enforce or cancel, for the benefit of the policyholders, members, and PCLIC contract performance by any party who had contracted with PCLIC.
- 10) The Commissioner be entitled to permit such further operation of PCLIC as he may deem necessary to be in the best interests of the policyholders, members, and creditors of PCLIC and the orderly rehabilitation of PCLIC.
- 11) All authority of all officers, directors, and managers of PCLIC be suspended and all

authority of said officers, directors and managers be vested in the Commissioner.

- 12) The Rehabilitator and Receiver of PCLIC be allowed and authorized to:
 - a) Employ and authorize the compensation of accountants, clerks, attorneys or such assistants as he deems necessary, and authorize the payment of the expenses of these proceedings and the necessary incidents thereof, as approved by the Court, out of the funds or assets of PCLIC in the possession of the Receiver or coming into PCLIC's possession;
 - b) Defend or not defend legal actions wherein PCLIC or the Receiver is a party defendant, commenced prior to or subsequent to the entry of the order herein, without the authorization of the Court, except, however, in actions where PCLIC is a nominal party, as in certain foreclosure actions and the action does not affect a claim against or adversely affect the assets of PCLIC, the Receiver may file appropriate pleadings in his discretion;
 - c) Commence and maintain all legal actions necessary, wherever necessary, for the proper administration of this receivership proceeding;
 - d) Collect all debts, which are economically feasible to collect and which are due and owing to PCLIC;
 - e) Take possession of all of PCLIC's securities and certificates of deposit on deposit with any financial institution or any other person or entity, if any, and convert to cash so much of the same as may be necessary, in his judgment, to pay the expenses of administration of this receivership;
 - f) Issue endorsements on existing policies.
- Any officer, director, employee, manager, trustee, agent, adjustor, accountant, actuary, attorney, contractor, consultant, or third party administrator of PCLIC and any person who possesses or possessed any executive authority over, or who exercises or exercised any control over any segment of PCLIC's affairs be required to fully cooperate with the Receiver and the Commissioner, notwithstanding their dismissal pursuant to the order entered herein.
- All attorneys employed by PCLIC as of the date of the order entered herein shall, within ten (10) days notice of the order entered herein, report to the Receiver or Commissioner on the name, company, claim number and status of each file they are handling on behalf of PCLIC. Said report shall also include an account of any funds received from or on behalf of PCLIC. All attorneys described herein are hereby discharged as of the date of the order entered herein unless the Receiver or Commissioner retains their services in writing. All attorneys employed by PCLIC who are in possession of litigation files or other material, documents or records belonging to or relating to work performed by the attorney on behalf of PCLIC shall deliver such litigation files, material, documents or records intact and without purging to the Receiver notwithstanding any claim of a retaining lien, which, if otherwise valid, shall not be extinguished by such turn-over of documents.
- Receiver at the Receiver's discretion and with the consent of the court where required by law. The Receiver shall handle reinsurance losses recoverable or payable by PCLIC. All correspondence concerning reinsurance shall be between the Receiver and the reinsuring company or intermediary unless otherwise authorized by the Receiver.
- Any bank, savings and loan association, financial institution, and any other person or entity which has on deposit, in its possession, custody or control any funds, accounts and any other assets of PCLIC, be ordered to immediately transfer title, custody and control of all such funds, accounts, or assets to the Receiver, and instructed that the Receiver has absolute control over such funds, accounts and other assets. The Receiver may change the name of

such accounts and other assets, withdraw the funds from such bank, savings and loan associations or other financial institutions or take such lesser action necessary for the proper conduct of this receivership. No bank, savings and loan association, or other financial institution, person or entity shall freeze or place a hard hold on, or exercise any form of set-off, alleged set-off, lien, any form of self-help whatsoever, or refuse to transfer any funds or assets to the Receiver's control without the permission of this Court.

- Any bank, savings and loan association, financial institution, and any other person or entity which has on deposit, in its possession, custody or control any funds, accounts and any other assets of PCLIC, shall not be permitted to freeze or place a hard hold on, or exercise any form of set-off, alleged set-off, lien, any form of self-help whatsoever, or refuse to transfer any funds or assets to the control of the Commissioner, the Receiver or his appointees without the permission of this Court.
- Any entity furnishing telephone, water, electric, sewage, garbage or trash removal services to PCLIC be required to maintain such service and transfer any such accounts to the Receiver as of the date of the order entered herein, unless instructed to the contrary by the Receiver.
- 19) Any data processing service which has custody or control of any data processing information and records, including, but not limited to, source documents, data processing cards, input tapes, all types of storage information, master tapes or any other recorded information relating to PCLIC be required to transfer custody and control of such records to the Commissioner.
- The United States Postal Service shall be directed to provide any information requested by the Receiver regarding PCLIC and to handle future deliveries of PCLIC's mail as directed by the Receiver.
- Upon request by the Receiver, any company providing telephone services to PCLIC shall provide a reference of calls from the number presently assigned to PCLIC to any such number designated by the Receiver or perform any other services or changes necessary to the conduct of the receivership of PCLIC.
- 22) The Commissioner and his assistants be authorized to conduct an investigation of PCLIC and its subsidiaries and affiliates to uncover and make fully available to the Court the true state of PCLIC's financial affairs. In furtherance of this investigation, PCLIC, its subsidiaries, its affiliates, owners, officers, directors, managers, attorneys, trustees, agents, adjusters, employees, accountants, attorneys, actuaries, servants, employees, contractors, consultants, or third party administrators of PCLIC and its third party administrators, be required to make all books, documents, accounts, records and affairs, which either belong to or pertain to PCLIC available for full, free and unhindered inspection and examination by the Commissioner during normal business hours, Monday through Friday, from the date of the order entered herein. PCLIC and the above-specified entities shall fully cooperate with the Commissioner, including, but not limited to, the taking of oral testimony under oath of PCLIC and its officers, directors, managers, trustees, agents, employees, adjustors, accountants, actuaries, attorneys, servants, employees, contractors, consultants, or third party administrators of PCLIC, its affiliates and subsidiaries and any other person or entity who possesses any executive authority over, or who exercises any control over, any segment of the affairs of PCLIC in both their official, representative, and individual capacities and the production of all documents that are calculated to disclose the true state of PCLIC's affairs.
- PCLIC, its members, policyholders, officers, directors, agents, adjustors, accountants, actuaries, attorneys, servants, employees, contractors, consultants, third party administrators, and any other partnership, company or entity controlled by same and/or other persons acting for or on behalf of PCLIC, or subject to their control, and all other persons or entities who have access to, control or possession of the property, assets, and affairs of PCLIC be enjoined:

- a) from disposing of or encumbering any of the property or assets of PCLIC;
- b) from disposing of any records or other documents belonging of PCLIC or relating to the business and affairs of the of PCLIC;
- c) from the transaction of any business by, for, or on behalf of PCLIC, including, but not limited to:
 - i) the writing, issuance or renewal of any certificate of coverage, insurance policy, binder, or endorsement to an existing policy or certificate of coverage;
 - ii) the payment of claims and of any policy or certificate of coverage benefits;
 - iii) the incurring of any claim or loss adjustment expense;
 - iv) the incurring of any debt or liability; and
 - v) the interfering with the acquisition of possession by the exercise of dominion and control over the property of PCLIC by the Commissioner or the Commissioner's conduct of the business and affairs of PCLIC.
- Any and all individuals and entities be enjoined from instituting and/or taking further action in any suits, proceedings, and seizures against PCLIC, the Commissioner in his capacity as rehabilitator of PCLIC, the Receiver, and any affiliates, subsidiaries, insurers, officers, directors, representatives, agents, employees, accountants, or attorneys of same, to prevent any preference, judgment, seizure, levy, attachment, or lien being rendered against PCLIC, its estate and assets, and/or its members or policyholders, the Commissioner in his capacity as rehabilitator and/or liquidator, the Receiver, any affiliates, subsidiaries, insurers, officers, directors, representatives, agents, employees, or attorneys of same, and the making of any levy against PCLIC, its property or assets.
- Except with the concurrence of the Commissioner or until further written order of this Court, all suits, proceedings, and seizures against PCLIC and/or its respective members and/or policyholders be stayed in order to prevent the obtaining of any preference, judgment, seizure, levy, or lien, and to preserve the property and assets of PCLIC, including, but not limited to, suits and proceedings and all litigation where:
 - a) PCLIC is a party;
 - b) A member, policyholder or any other person who is named as a party to the litigation claims insurance coverage under any policy of insurance or certificate of coverage issued or assumed by PCLIC;
 - The litigation involves or may involve the adjudication of liability or determines any possible rights or obligations of any member, policyholder or person as to any insurance policy or certificate of coverage issued or assumed by PCLIC, or determines any possible future liability of PCLIC with regard to any insurance policy or certificate of coverage issued or assumed by PCLIC;
 - d) PCLIC would otherwise be obligated to provide a defense to any party in any court pursuant to any policy of insurance or certificate of coverage issued or assumed by PCLIC;
 - e) The ownership, operations, management and/or control of PCLIC is at issue; and
 - f) Any party is seeking to create, perfect or enforce any preference, judgment, attachment, lien or levy against PCLIC or its assets or against any member, and/or policyholder of PCLIC.

- Any action in any suit or proceeding against the Commissioner in his capacity as 26) Rehabilitator of PCLIC, the Receiver, and/or any attorney in his capacity as attorney for the Commissioner in his capacity as rehabilitator of PCLIC, and their representatives, agents, employees, or attorneys, when acting in accordance with this Order and/or as Rehabilitator, Receiver, or Deputy Receiver of PCLIC be barred.
- That there shall be no liability on the part of, and that no cause of action of any nature shall 27) exist against the Commissioner in his capacity as Commissioner and/or regulator of PCLIC, the Receiver and/or any person in his capacity as attorney for the Commissioner as Commissioner and/or regulator of PCLIC, and/or their assistants, representatives, agents, employees, or attorneys, for any action taken by them when acting in accordance with the orders of this Court and/or in the performance of their power and duties as Rehabilitator, Receiver, Commissioner and/or regulator of PCLIC.
- That any and all individuals and entities be enjoined from interfering with these 28) proceedings, or with the Commissioner's possession and control; from interfering with the conduct of the business of PCLIC by the Commissioner; from wasting the assets of PCLIC, and from obtaining preferences, judgments, attachments or other like liens or the making of any levy against PCLIC or its property and assets while in the possession and control of the Commissioner.
- That all premiums and all other debts and payables due to PCLIC be paid to the 29) Commissioner.
- That the Commissioner be permitted to notify every holder of contract of insurance issued 30) by PCLIC and every known creditor of PCLIC of the order of rehabilitation and injunction entered herein within thirty (30) days of the date of this order, notwithstanding the provisions of La. R.S. 22:2011.
- That all contracts between PCLIC and any and all persons or entities providing services to 31) PCLIC and its policyholders and members, shall remain in full force and effect unless canceled by the Receiver, until further order of this Court.
- That the Commissioner be granted all legal and equitable relief as may be necessary to 32) fulfill his duties as rehabilitator and for such other relief as the nature of the case and the interests of PCLIC's members, policyholders, creditors, or the public may require, including but not limited to the Receiver's appointment and authorization to prosecute all action which may exist on behalf of PCLIC members, policyholders, or creditors against any existing or former officer, director or employee of PCLIC or any other person.
- That Matthew Stewart, Norrie Falgoust, James Henry, and Rudy Babin be appointed as 33) Process Servers for service of all process and further pleadings on PCLIC.

And for all other appropriate relief.

CLUCK FOLES THE CLYDRY PROCESS WELL SIL By: D 14-OTHER
D 15-DE.Q. 12-YULG SETY CO.

Respectfully submitted, JAMES J. DONELON

Commissioner of Insurance

Walter L. Corey, Jr. (#29555)

Louisiana Department of Insurance

1702 N. Third St. (70802)

P.O. Box 94214

Baton Rouge, LA 70804-9214

Telephone: (225) 219-0605 Facsimile: (225) 342-1632 Email: wcorey@ldi.la.gov

PLEASE SERVE THIS **PETITION** AND **SIGNED ORDER** AND **ALL ATTACHMENTS AS FOLLOWS**:

BY PRIVATE PROCESS SERVER APPOINTED BY THE COURT TO:

PRIDE OF CARROLL LIFE INSURANCE COMPANY

- 1. PRIDE OF CARROLL LIFE INSURANCE COMPANY through its President/Director Karen T. Teamer 503 Sparrow Street Lake Providence, Louisiana 71254
- Cherie E. Teamer, Director
 2661 Gravier Street
 New Orleans, LA 70119
- 3. Harry Hall, Director 308 E. Moore Street Lake Providence, LA 71254

NINETEENTH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE STATE OF LOUISIANA

NUMBER: DIVISION
JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA
VERSUS
PRIDE OF CARROLL LIFE INSURANCE COMPANY
FILED: DEPUTY CLERK
AFFIDAVIT AND VERIFICATION
STATE OF LOUISIANA PARISH OF EAST BATON ROUGE
BEFORE ME , the undersigned notary, and in the presence of the undersigned competent witnesses, personally came and appeared:
CAROLINE BROCK
a competent major, who after being duly sworn, did depose and state:
I am the Deputy Commissioner, Office of Financial Solvency for the Department of Insurance. State of Louisiana, duly appointed by the Commissioner of Insurance.
I have read the foregoing petition for rehabilitation and injunctive relief for Pride of Carroll Life Insurance Company, and the allegations contained therein are true and correct to the best of the my knowledge.
WITNESSES:
Claire hemoire CAROLINE BROCK
Zata W. Ard
Sworn to and Subscribed before me this 16th day of Angast, 2017.
Notary Public Notary Public

NINETEENTH JUDICIAL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE STATE OF LOUISIANA

NUMBER:	DIVISION:						
	JAMES J. DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF LOUISIANA						
VERSUS							
	PRIDE OF CARROLL LIFE INSURANCE COMPANY						
FILED:	DEPUTY CLERK						
	AFFIDAVIT						
STATE OF LO PARISH OF E	OUISIANA EAST BATON ROUGE						
	RE ME , the undersigned notary, and in the presence of the undersigned competent onally came and appeared:						
	CAROLINE BROCK						
a competent ma	ajor, who after being duly sworn, did depose and state:						
_	by Commissioner of Financial Solvency for the Department of Insurance, State of appointed by the Commissioner of Insurance.						
Department of	with my duties, I have reviewed the financial statements filed with the Louisiana Insurance by Pride of Carroll Life Insurance Company ("PCLIC"), including, but PCLIC's annual statements and the financial records of PCLIC.						
	n contained in this affidavit is based on my personal knowledge derived from my inancial statements and records of Pride of Carroll Insurance Company and my with my staff.						
capital and surp	ne financial records of PCLIC reveals that PCLIC has not maintained the minimum plus requirements required by Louisiana Insurance Code and further reflects that went and has obligations or claims exceeding its assets.						
-	revealed that PCLIC has made numerous unauthorized transfers of its admitted liate, Brannum Funeral Home, in violation of the Louisiana Insurance Code.						
•	revealed that PCLIC is in such condition that the further transaction of business by be hazardous to its policyholders, creditors and/or the public.						
That the above	is true and correct to the best of my knowledge.						
WITNESSES:	CAROLINE BROCK CAROLINE BROCK Ubscribed before me this 16 day of August, 2017. Notary Public						

Pride of Carroll Life Insurance Company Accounts Receivable- Brannum Funeral Home as of 04/03/17

12/31/14 R	alance per Per 2015 A/S (Corrected)		Exhibit A	\$	64,700.00		
	alance per Per 2015 A/S (Corrected)		Exhibit A	\$	123,602.00		
,,	diante per la 2013 A/3 (corrected)		LAMDIL A	7	123,002.00		
12/31/14 B	alance per 2015 Annual Statement [C]						\$ 64,700.00
2015	Charles O Tunnefour (Name 4)						z
01/05/15	Checks & Transfers (Note 1) Transfer to Brannum	VEED			4 200 00		
		XFER		\$	1,300.00		
01/16/15	Brannum Funeral Home	1263			4,000.00		
	Transfer to Brannum	XFER			3,000.00		
	Brannum Funeral Home	1289			6,300.00		
	Brannum Funeral Home	1295			16,000.00		
05/26/15		XFER			1,500.00		
06/03/15	Transfer to Brannum	XFER			1,800.00		
06/23/15	Transfer to Brannum	XFER			1,500.00		
07/02/15	Transfer to Brannum	XFER			1,000.00		
07/07/15	Brannum Funeral Home	3			3,600.00		
07/09/15	Transfer to Brannum	XFER			2,500.00		
07/14/15	Transfer to Brannum	XFER			1,001.00		
07/07/15	Transfer to Brannum	XFER			701.00		
07/30/15	Brannum Funeral Home	1339			2,600.00		
08/04/15	Transfer to Brannum	XFER			500.00		
08/06/15	Transfer to Brannum	XFER			1,000.00		
10/13/15	Transfer to Brannum	XFER			2,000.00		
10/14/15	Transfer to Brannum	XFER			1,500.00		
11/06/15	Transfer to Brannum	XFER			1,100.00		
11/18/15	Brannum Funeral Home	1378			7,000.00		
						\$ 59,902.00	
	JE to Accrue Rent	JE100			(500.00)		
12/31/15	JE to Accrue Rent	JE103			(500.00)	\$ (1,000.00)	
						_	
12/31/15 Ba	lance						\$ 123,602.00
[12/31/15	Balance per Per Filed 2015 A/S (Corrected,	\$123,602]				
2016	Charles & Transfers (Nata 2)						
	Checks & Transfers (Note 2)						
01/15/16		1204			2 000 00		
	Brannum Funeral Home	1394		\$	3,000.00		
01/15/16	(Not Recivable- Actual Claim Pymts)			\$	(3,000.00)		
01/15/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home	1394 1396		\$	(3,000.00)		
	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment)	1396		\$	(3,000.00) 500.00 (500.00)		,
01/22/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum	1396 XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00		
01/22/16 02/10/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum	1396 XFER XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00		
01/22/16 02/10/16 03/16/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home	1396 XFER XFER 1420		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00		
01/22/16 02/10/16 03/16/16 04/04/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer to Brannum	1396 XFER XFER 1420 XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer to Brannum Transfer From Brannum	1396 XFER XFER 1420 XFER XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00 (2,000.00)		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer to Brannum Transfer From Brannum Brannum Funeral Home	1396 XFER XFER 1420 XFER XFER 1442		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00 (2,000.00) 7,000.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home Brannum Funeral Home	1396 XFER XFER 1420 XFER XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00 (2,000.00) 7,000.00 500.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer to Brannum Brannum Funeral Home Brannum Funeral Home Brannum Funeral Home (Not Receivable- Actual Rent Payment)	1396 XFER XFER 1420 XFER XFER 1442 1455		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00 (2,000.00) 7,000.00 500.00 (500.00)		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3)	1396 XFER XFER 1420 XFER XFER 1442 1455		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16 06/08/16 08/08/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum	1396 XFER XFER 1420 XFER XFER 1442 1455		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00 4,000.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Brannum Funeral Home Transfer to Brannum Transfer From Brannum Brannum Funeral Home Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum Brannum Funeral Home	1396 XFER XFER 1420 XFER XFER 1442 1455		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00 4,000.00 500.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16 06/08/16 08/08/16 08/15/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum Brannum Funeral Home (Rent)	1396 XFER XFER 1420 XFER 1442 1455 1460 XFER 1483		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00 4,000.00 500.00 (500.00)		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16 06/08/16 08/08/16 08/15/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum Brannum Funeral Home (Rent) Brannum Funeral Home	1396 XFER XFER 1420 XFER XFER 1442 1455 1460 XFER 1483 XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00 4,000.00 500.00 (500.00) 2,200.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16 06/08/16 08/08/16 08/15/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum Brannum Funeral Home (Rent) Brannum Funeral Home	1396 XFER XFER 1420 XFER XFER 1442 1455 1460 XFER 1483 XFER XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00 4,000.00 (500.00) 2,200.00 4,000.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16 06/08/16 08/08/16 08/15/16 08/25/16 09/15/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum Brannum Funeral Home (Rent) Brannum Funeral Home	1396 XFER XFER 1420 XFER 1442 1455 1460 XFER 1483 XFER XFER XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 4,000.00 500.00 (500.00) 1,191.00 4,000.00 500.00 (500.00) 2,200.00 4,000.00 3,000.00		
01/22/16 02/10/16 03/16/16 04/04/16 04/06/16 05/25/16 05/27/16 06/08/16 08/08/16 08/15/16	(Not Recivable- Actual Claim Pymts) Brannum Funeral Home (Not Receivable- Actual Rent Payment) Transfer to Brannum Transfer to Brannum Brannum Funeral Home Transfer From Brannum Brannum Funeral Home (Not Receivable- Actual Rent Payment) Creech Monument (NOTE 3) Transfer to Brannum Brannum Funeral Home (Rent) Brannum Funeral Home	1396 XFER XFER 1420 XFER XFER 1442 1455 1460 XFER 1483 XFER XFER		\$	(3,000.00) 500.00 (500.00) 2,000.00 1,000.00 4,800.00 (2,000.00) 7,000.00 500.00 (500.00) 1,191.00 4,000.00 (500.00) 2,200.00 4,000.00		

Pride of Carroll Life Insurance Company

Accounts Receivable- Brannum Funeral Home as of 04/03/17

11/07/16	Transfer to Brannum	XFER	3,000.00
11/14/16	Transfer to Brannum	XFER	4,000.00
12/22/16	BFH (Rosie Kelly)	1526	901.00
	(For Claim Pymt)		(901.00)
12/22/16	Brannum Funeral Home	XFER	3,000.00
12/28/16	Hough Realty (NOTE 4)	1531	2,500.00
12/30/16	Force Pay (Transfer to Brannum)		2,000.00
Total	Checks/Transfers to BFH for 2016		\$ 48,691.00
	Rent paid 3 times in 2016: Allow 1 r	month	\$ (500.00)

12/31/16 Balance per Administrative Supervisor

\$ 171,793.00

2017 Checks & Transfers (Note 2)				
01/09/17 Brannum Funeral Home	XFER	\$	3,000.00	
01/11/17 Brannum Funeral Home	XFER		5,000.00	
01/17/17 Brannum Funeral Home	XFER		2,000.00	
03/31/17 Deposit (BFH)			(4,000.00)	
Total Checks/Transfers to BFH for 2017		-	\$	6,000.00
Allow for Rent: (No rent paid 1st Qtr)			\$	(500.00)

04/03/17 Balance per Administrative Supervisor

\$ 177,293.00

(04/03/17 is date of Admin. Supervision)

NOTE 1: These entries were taken from the General Ledger for 2015 which was provided to the Examiner.

NOTE 2: These entries were taken from the bank statements/check stubs/General Ledger for 2016 & 2017.

NOTE 3: Payment to Creech Monument- Based on the entry on the reference line of the check ("BFH"), this appears to be for the benefit of Brannum Funeral Home.

NOTE 4: Payment to Hough Reality-This appears to be the payment for the appraisal prepared for Brannum Funeral Home and should not be considered an expense of Pride of Carroll