

STATE OF VERMONT

SUPERIOR COURT  
WASHINGTON UNIT

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COMMISSIONER OF THE  
DEPARTMENT OF FINANCIAL  
REGULATION

PLAINTIFF,

v.

EMERGENCY PHYSICIANS INSURANCE  
EXCHANGE RISK RETENTION GROUP  
RESPONDENT.

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CIVIL DIVISION

DOCKET NO. 21-cv-348 Wncv

**REHABILITATOR'S SECOND STATUS REPORT**

I, J. David Leslie, Special Deputy Rehabilitator, hereby submit this Second Status Report regarding the rehabilitation of Emergency Physicians Insurance Exchange Risk Retention Group ("EPIX" or the "Company").

1. On February 18, 2021, the Commissioner of the Department of Financial Regulation ("Commissioner") filed a Petition for Order of Rehabilitation for EPIX pursuant to 8 V.S.A. § 7051, seeking, among other things, authorization to take possession and control of the assets of EPIX, to administer those assets under the general supervision of the Court, and to implement the proposed Plan of Rehabilitation. The Court granted the Commissioner's petition by entering its Order for Rehabilitation of EPIX ("Rehabilitation Order") on February 26, 2021. The Rehabilitation Order appointed the Commissioner as Rehabilitator, granted the requested authority, and directed the Rehabilitator to implement the Plan of Rehabilitation. The Rehabilitator appointed me to serve as Special Deputy Rehabilitator.

2. Notice. Since entry of the Rehabilitation Order, the Rehabilitator has provided notice of the rehabilitation to all former EPIX members (the Company has had no in-force policies since September 1, 2020) including a Q&A document that describes the reasons for the Commissioner's petition, the Plan of Rehabilitation, and the effect of rehabilitation on policyholders. Notice of rehabilitation has also been provided to regulators, defense counsel, EPIX vendors with current claims, the Company's reinsurer, and other affected parties. Further, counsel for the Rehabilitator has participated in telephone calls with many individual insureds, defense counsel, and plaintiffs' counsel regarding the Company's insolvency, the effects of rehabilitation, and next steps.

3. I filed the Rehabilitator's First Status Report with the Court on May 24, 2021, advising as to the provision of notice, describing implementation of the Plan of Rehabilitation, and reporting on receipts/disbursements from the start of the proceeding. The First Status Report was posted on the Department of Financial Regulation website ([www.dfr.vermont.gov/epix](http://www.dfr.vermont.gov/epix)) where the public may also access the Commissioner's petition (including the Plan of Rehabilitation), the Rehabilitation Order, and a Q&A document. The Rehabilitator will continue to post key documents (including this Status Report) on the State website and on the Company's former website ([www.epixrrg.com](http://www.epixrrg.com)) for so long as that site is maintained.

4. Semiannual Accounting & Opinion Regarding Reorganization. The insurance laws require that, after an order of rehabilitation has been entered, the rehabilitator provide semiannual accountings to the supervising court and that these accountings shall include a report of the rehabilitator's opinion as to the likelihood that a plan of reorganization will be filed. See 8 V.S.A. § 7052(b). In accordance with the receivership statutes, an accounting of all receipts and disbursements from the Company's accounts from February 26, 2021 to April 30, 2021 is

attached as Exhibit A. With one exception (discussed further below), all of the disbursements reported were approved by the Rehabilitator and are consistent with the Rehabilitation Order and Plan of Rehabilitation. With regard to the likelihood of reorganization, the Rehabilitator notes that EPIX transitioned all of its coverage to another carrier prior to insolvency and was operating in voluntary runoff prior to rehabilitation. The Rehabilitator is therefore of the opinion that there is no going concern that might be reorganized and that there is minimal likelihood that such a plan will be filed.

5. The Rehabilitator has recently learned that \$23,000 was withdrawn from the Company's checking account at US Bank without authorization on July 20, 2021. It appears that these funds were withdrawn by US Bank pursuant to an order of garnishment served on the bank prior to rehabilitation and about which the Rehabilitator had not been informed. This garnishment was made in respect of a 2017 judgement entered against EPIX in relation to a former member's claim for return of certain capital contributions. Such a claim would fall below priority class 3 in liquidation and may, therefore, reflect a violation of the Rehabilitation Order and constitute a voidable preference under the liquidation statutes. See Rehabilitation Order ¶ f; 8 Vt. Stat. Ann. §§ 7067 (voidable preferences) and 7081 (priority classification). The Rehabilitator is evaluating the potential for recovery of these funds and the steps that are necessary to ensure it cannot be repeated.

6. Estate Assets. As of November 30, 2021, EPIX had liquid assets of \$9,277,698 consisting of \$596,113 in cash and cash equivalents and \$8,681,585 of invested assets. Reinsurance recoveries may also constitute a material asset of the estate but, as these are contingent and unquantified, they are not reported as liquid assets. In addition to these liquid assets, it should also be noted that when calculating distributions in liquidation, the EPIX estate

will be entitled to credit for approximately \$937,000 in reimbursement on policy-level claims made pursuant to the Plan of Rehabilitation through November 30, 2021. See, *infra*, ¶ 9.

7. Estate Liabilities. To avoid the creation of preferences payments in rehabilitation must be made in a manner consistent with the statutory priority classes. See, 8 V.S.A. §§ 7067 and 7081. With regard to priority class 1 (administrative expenses), the Petition for Order of Rehabilitation (¶ 6) noted that the Company had accrued \$0.9 million in administrative expense and that, on a conservative basis, total administrative costs to complete runoff and liquidation might total \$1.9 million. Priority class 2 (administrative expenses of guaranty associations) will be empty in this proceeding because EPIX is a risk retention group and therefore barred by federal law from participating in the guaranty association system. See 15 U.S.C.A. § 3902(a)(2). Priority class 3 (policyholder level claims) is expected to include loss, loss adjustment expenses, and a small amount of return premium. The Petition for Order of Rehabilitation noted that the Company's actuaries had provided low (optimistic), high (conservative), and central (select) estimates of claim exposures. The Rehabilitator believes that the high estimate -- \$13.2 million in loss and loss adjustment expenses -- is appropriate for purposes of rehabilitation planning and that other policy-level claims may be reasonably estimated at \$100,000. It is unlikely that estate assets will be sufficient to make distribution on claims that would fall in priority classes 4 through 10 so the Rehabilitator has not attempted to estimate the value of such liabilities.

8. Staffing & Administrative Services. To provide policyholders with support and to maintain as much stability as possible, the Rehabilitator arranged for the two individuals who had formed the Company's pre-rehabilitation claims staff to continue providing such services

as vendors.<sup>1</sup> Using the same structure, the Rehabilitator also retained the Company's former office manager to provide IT, loss run/credentialling, and records support.

9. Because EPIX is insolvent and will eventually be liquidated, the Rehabilitator cannot offer the same stability and long-term employment prospects as an insurer operating as a going concern. Staff attrition was therefore a significant concern which the Rehabilitator addressed through guaranteed periods of employment and, in one case, a retention bonus. Both of the EPIX claim staffers, however, have now either resigned or provided notice of resignation at year end. Accordingly, in 2022 EPIX will be transitioning to receive claim service support exclusively through vendors.

10. Plan of Rehabilitation. Because EPIX is insolvent, the provision of a defense to insureds with open claims or the payment of losses insured under the Company's policies could create preferences under the insurance laws. See 8 V.S.A. § 7067. The Plan of Rehabilitation therefore contemplated that EPIX would cease providing its insureds with a defense, that insureds would assume responsibility for the defense of claims against them, and that EPIX would reimburse 40% of those defense expenses as well as 40% of insured loss. The Rehabilitator has reached out to policyholders and defense counsel to describe the Plan of Rehabilitation, discuss the necessity of policyholders engaging defense counsel directly, and explain the Plan of Rehabilitation, the reimbursement process, and this proceeding more generally. Through November 30, 2021, the Rehabilitator has received and processed loss adjustment expenses totaling \$577,094.30 and made reimbursements totaling \$230,837.72.

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<sup>1</sup> Formally, the Liquidator entered into an Independent Contractor Services agreement with Kollath & Associates CPA, LLC ("Kollath"), while Kollath retained the claims staff as co-employer together with a professional employer organization, SustainableHR PEO, LLC.

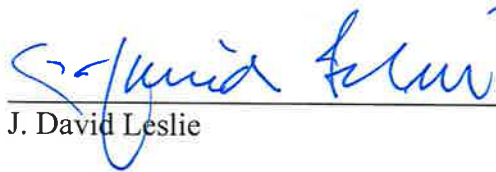
During the same period, the Rehabilitator has received proof of loss totaling \$1,765,000 and made reimbursements totaling \$706,000.

11. Status of Open Claims. When the Rehabilitation Order entered on February 26, 2021, EPIX had fifty-six open claims, forty-two of which involved active litigation. Following notice of this proceeding and outreach to the policyholders, the Rehabilitator has received reimbursement requests regarding thirty-six claims that have produced the reimbursements described in the preceding paragraph. Eighteen of the original open claims have been resolved through judgment, settlement, or the issuance of coverage denial letters leaving a total of thirty-eight remaining open claims.

12. Of the thirty-eight open claims, only seven have trials scheduled in the next twelve months. EPIX claims staff advise that this is an unusually low number for the Company. The relatively small number of trials raises concerns that pandemic-related backlogs may delay the resolution of underlying malpractice claims. This may, in turn, affect the pace at which EPIX claims can be closed and the Company's affairs wound down. The Rehabilitator will monitor the situation and include consideration as to the pace of claim resolution in making the determination when to recommend converting this proceeding from a rehabilitation to a liquidation.

13. Next Steps. At this stage in rehabilitation, it is difficult to predict the time that may be necessary to resolve all of the Company's remaining claims. The Rehabilitator's working assumption, however, is that rehabilitation and subsequent liquidation will require a total of between twenty-four and thirty-six months. In the coming months, the Rehabilitator will retain vendors to assist with claims administration and will work with policyholders to ensure that the Company remains informed of and involved in the management of open claims with a

view towards resolving them in a speedy and efficient manner. The Rehabilitator proposes to make his next report and accounting six months from now, in June of 2022. See 8 V.S.A. § 7052(b) (rehabilitators to file semiannual accountings).

  
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J. David Leslie

December 27, 2021

Subscribed and sworn before me this 27<sup>th</sup> day of December, 2021.



Notary Public

My commission expires:



## EXHIBIT A

### EPIX Rehabilitation Accounting

Receipts and Disbursements – Inception through November 30, 2021

Date	Payee/Payor	Description	Disbursements	Receipts
2/28/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	5,931.41	
2/28/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	368.70	
3/3/2021	Actuarial Advantage, Inc.	Actuarial Support	18,000.00	
3/3/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	893.86	
3/3/2021	Real Connection Media	Web Hosting/Support	200.00	
3/3/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,259.58	
3/3/2021	Value Stream Managers, LLC	Administrative Expense	1,750.00	
3/8/2021	Emergency Care and Health Organization ("ECHO")	Deductible Recovery		5,000.00
3/12/2021	HCutt, LLC	IT Services/Licenses	832.50	
3/12/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	5,708.09	
3/12/2021	Rackemann Sawyer & Brewster	Administrative Expense	7,490.00	
3/12/2021	Robin Rae Freed	Administrative Expense	50.00	
3/12/2021	Sarah Scheib	Administrative Expense	45.55	
3/12/2021	US Bank	Bank Fees	375.29	
3/12/2021	US Bank	Corporate Credit Card	932.42	
3/15/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	6,329.80	
3/18/2021	Wigger Law Firm	Asset Recovery		1,897.96
3/19/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
3/19/2021	Real Connection Media	Web Hosting/Support	200.00	
3/29/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	6,212.12	
3/31/2021	US Bank	Interest Received		1.12
3/31/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	2,979.19	
3/31/2021	State of Kansas	Taxes/Fees	125.00	
3/31/2021	NY Refund from 2020	Asset Recovery		2,665.00
4/9/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	6,213.59	
4/12/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	945.84	
4/12/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	321.00	
4/13/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services		2,979.19
4/14/2021	US Bank	Corporate Credit Card	869.64	
4/15/2021	HCutt, LLC	IT Services/Licenses	832.50	
4/15/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	5,259.32	
4/15/2021	Real Connection Media	Web Hosting/Support	300.00	
4/15/2021	Robin Rae Freed	Administrative Expense	50.00	
4/15/2021	Sarah Scheib	Administrative Expense	45.55	
4/15/2021	US Bank	Bank Fees	421.44	
4/20/2021	Markoff Law LLC	Deductible Recovery Expense	3,000.00	



Date	Payee/Payor	Description	Disbursements	Receipts
4/22/2021	Rackemann Sawyer & Brewster	Administrative Expense	15,107.50	
4/23/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	6,250.50	
4/28/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
4/28/2021	Northern Nevada Emer. Physicians	LAE (40% Initial Distribution)	568.54	
4/30/2021	ECHO	Deductible Recovery		5,000.00
4/30/2021	US Bank	Interest Received		1.10
5/3/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,231.10	
5/3/2021	Crowe & Mulvey, LLP Trust Account	Loss (40% Initial Distribution)	100,000.00	
5/4/2021	ECHO	Deductible Recovery		5,000.00
5/6/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	341.58	
5/6/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	3,622.60	
5/10/2021	Sarah Scheib	Administrative Expense	45.55	
5/10/2021	Payroll transfer	Outsourced Claims Staff	6,177.66	
5/13/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
5/13/2021	HCutt, LLC	Administrative Expense	832.50	
5/13/2021	Robin Rae Freed	Administrative Expense	50.00	
5/14/2021	US Bank	Bank Fees	852.53	
5/17/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	973.56	
5/17/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	777.44	
5/17/2021	Cassiday Schade LLP	LAE (40% Initial Distribution)	1,350.36	
5/19/2021	Rackemann Sawyer & Brewster	Administrative Expense	6,203.50	
5/24/2021	Payroll transfer	Outsourced Claims Staff	6,106.81	
5/24/2021	SC Dept of Ins	Asset Recovery		4,235.23
6/1/2021	Markoff Law LLC	LAE (40% Initial Distribution)	2,000.00	
6/1/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
6/2/2021	US Bank	Bank Fees	390.42	
6/3/2021	Kessner, Umebayashi, Bain & Matsunaga	LAE (40% Initial Distribution)	58.64	
6/3/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	2,056.36	
6/3/2021	Kinthead & Stilz, PLLC	LAE (40% Initial Distribution)	1,884.60	
6/3/2021	Immediate Health Associates, Inc.	LAE (40% Initial Distribution)	5,237.46	
6/3/2021	Bradford Wendell Cotton	LAE (40% Initial Distribution)	5,237.46	
6/3/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,259.58	
6/4/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,262.76	
6/7/2021	ECHO	Deductible Recovery		5,000.00
6/7/2021	Payroll transfer	Outsourced Claims Staff	5,993.43	
6/8/2021	HCutt, LLC	Administrative Expense	832.50	
6/8/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	3,575.07	
6/8/2021	Sarah Scheib	Administrative Expense	61.88	
6/14/2021	Jamie Lemons, as Administrator, Cathy Chaney & the Womick Law Firm	Loss (40% Initial Distribution)	160,000.00	
6/14/2021	US Bank	Bank Fees	864.86	
6/16/2021	Rackemann Sawyer & Brewster	Administrative Expense	10,282.00	
6/16/2021	Robin Rae Freed	Administrative Expense	50.00	

Date	Payee/Payor	Description	Disbursements	Receipts
6/18/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	200.52	
6/18/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	189.00	
6/18/2021	Barbara M Walsh	LAE (40% Initial Distribution)	1,600.00	
6/18/2021	Sara Lynn Palecek Ross	LAE (40% Initial Distribution)	950.00	
6/18/2021	Horn Aylward & Bandy, LLC	LAE (40% Initial Distribution)	6,440.11	
6/21/2021	Payroll transfer	Outsourced Claims Staff	5,426.56	
6/21/2021	US Bank	Corporate Credit Card	728.09	
6/21/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
6/22/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
6/28/2021	Richards & Connor	LAE (40% Initial Distribution)	380.20	
6/28/2021	South Yale Emergency Physicians, S.C.	LAE (40% Initial Distribution)	700.00	
6/28/2021	HeplerBroom LLC	LAE (40% Initial Distribution)	6.80	
6/28/2021	Immediate Health Associates, Inc.	LAE (40% Initial Distribution)	1,459.50	
6/28/2021	Joseph Felice	LAE (40% Initial Distribution)	678.55	
6/28/2021	Krithika Srinivasan	LAE (40% Initial Distribution)	678.55	
6/28/2021	Kinthead & Stilz, PLLC	LAE (40% Initial Distribution)	2,189.12	
6/28/2021	Bradford Wendell Cotton	LAE (40% Initial Distribution)	1,459.50	
6/29/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,262.76	
6/30/2021	US Bank	Interest Received		0.89
6/30/2021	NAIC	Administrative Expense	240.00	
7/1/2021	Payroll transfer	Outsourced Claims Staff	5,426.55	
7/1/2021	Samnang Chou, Per'll Rep. of estate of L. Khan and John Yasi, her attorney	Loss (40% Initial Distribution)	80,000.00	
7/6/2021	ECHO	Deductible Recovery		5,000.00
7/8/2021	Markoff Law LLC	LAE (40% Initial Distribution)	1,000.00	
7/8/2021	EM Strategies, LTD	Loss (40% Initial Distribution)	16,000.00	
7/8/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	4,617.89	
7/8/2021	HCutt, LLC	Administrative Expense	832.50	
7/8/2021	Robin Rae Freed	Administrative Expense	50.00	
7/8/2021	Sarah Scheib	Administrative Expense	45.55	
7/13/2021	Cassiday Schade LLP	LAE (40% Initial Distribution)	2,686.33	
7/13/2021	Richards & Connor	LAE (40% Initial Distribution)	1,177.76	
7/13/2021	HeplerBroom LLC	LAE (40% Initial Distribution)	271.60	
7/13/2021	Rackemann Sawyer & Brewster	Administrative Expense	8,797.50	
7/15/2021	Payroll transfer	Outsourced Claims Staff	5,375.65	
7/15/2021	US Bank	Bank Fees	870.45	
7/20/2021	Summa Emergency Assoc.	Garnishment	23,000.00	
7/20/2021	US Bank	Bank Fees	100.00	
7/21/2021	HCutt, LLC	Administrative Expense	832.50	
7/23/2021	Sanctuary Advisors, LLC	Administrative Expense	3,977.73	
7/26/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	1,518.29	
7/26/2021	Immediate Health Associates, Inc.	LAE (40% Initial Distribution)	1,124.08	
7/26/2021	HeplerBroom LLC	LAE (40% Initial Distribution)	848.40	

<b>Date</b>	<b>Payee/Payor</b>	<b>Description</b>	<b>Disbursements</b>	<b>Receipts</b>
7/26/2021	Richards & Connor	LAE (40% Initial Distribution)	171.97	
7/26/2021	Cassiday Schade LLP	LAE (40% Initial Distribution)	5,873.75	
7/26/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	59.40	
7/26/2021	Bradford Wendell Cotton	LAE (40% Initial Distribution)	1,124.08	
7/26/2021	Michael Andreevich Sagatelian	LAE (40% Initial Distribution)	2,100.00	
7/29/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,262.76	
7/29/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
7/30/2021	US Bank	Interest Received		0.40
7/31/2021	Payroll transfer	Outsourced Claims Staff	239.52	
7/31/2021	Payroll transfer	Outsourced Claims Staff	5,073.65	
8/2/2021	US Bank	Corporate Credit Card	5,034.22	
8/2/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	1,033.88	
8/10/2021	ECHO	Deductible Recovery		5,000.00
8/12/2021	Robin Rae Freed	Administrative Expense	50.55	
8/12/2021	Rackemann Sawyer & Brewster	Administrative Expense	6,870.00	
8/12/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	3,590.77	
8/12/2021	AI Insurance Inc.	Administrative Expense	18,082.68	
8/12/2021	HCutt, LLC	Administrative Expense	832.50	
8/12/2021	US Bank	Corporate Credit Card	292.14	
8/12/2021	Sarah Scheib	Administrative Expense	45.55	
8/13/2021	US Bank	Bank Fees	879.83	
8/16/2021	New York Commissioner of Taxation	Asset Recovery		910.57
8/16/2021	Payroll transfer	Outsourced Claims Staff	5,460.42	
8/18/2021	Krithika Srinivasan	LAE (40% Initial Distribution)	55.90	
8/18/2021	Morrison Mahoney L.L.P.	LAE (40% Initial Distribution)	713.60	
8/18/2021	Joseph Felice	LAE (40% Initial Distribution)	55.90	
8/18/2021	Richards & Connor	LAE (40% Initial Distribution)	3,822.65	
8/18/2021	Cassiday Schade LLP	LAE (40% Initial Distribution)	948.00	
8/18/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	4,879.46	
8/30/2021	Horn Aylward & Bandy, LLC	LAE (40% Initial Distribution)	887.60	
8/30/2021	Kinkead & Stilz, PLLC	LAE (40% Initial Distribution)	1,132.50	
8/30/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	97.63	
8/30/2021	HeplerBroom LLC	LAE (40% Initial Distribution)	697.88	
8/30/2021	Bradford Wendell Cotton	LAE (40% Initial Distribution)	368.40	
8/30/2021	Immediate Health Associates, Inc.	LAE (40% Initial Distribution)	368.40	
8/30/2021	Zautcke, John	LAE (40% Initial Distribution)	4,895.32	
8/31/2021	US Bank	Interest Received		0.27
8/31/2021	Payroll transfer	Outsourced Claims Staff	5,454.89	
9/3/2021	ECHO	Deductible Recovery		5,000.00
9/8/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,206.88	
9/8/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	2,117.76	
9/10/2021	Payroll transfer	Outsourced Claims Staff	4,850.69	
9/13/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	2,591.97	

Date	Payee/Payor	Description	Disbursements	Receipts
9/13/2021	HCutt, LLC	Administrative Expense	820.00	
9/15/2021	US Bank	Bank Fees	884.36	
9/15/2021	US Bank	Bank Fees	895.10	
9/15/2021	Rackemann Sawyer & Brewster	Administrative Expense	4,425.00	
9/15/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	983.39	
9/17/2021	EM Strategies, LTD	Loss (40% Initial Distribution)	120,000.00	
9/17/2021	Sarah Scheib	Administrative Expense	45.55	
9/17/2021	Robin Rae Freed	Administrative Expense	60.00	
9/20/2021	EM Strategies, LTD	Loss (40% Initial Distribution)	230,000.00	
9/20/2021	US Bank	Corporate Credit Card	378.02	
9/21/2021	Richards & Connor	LAE (40% Initial Distribution)	3,732.88	
9/21/2021	Immediate Health Associates, Inc.	LAE (40% Initial Distribution)	947.00	
9/21/2021	Bradford Wendell Cotton	LAE (40% Initial Distribution)	947.00	
9/21/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	918.00	
9/21/2021	Horn Aylward & Bandy, LLC	LAE (40% Initial Distribution)	1,877.82	
9/27/2021	Payroll transfer	Outsourced Claims Staff	4,319.82	
9/27/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	932.90	
9/28/2021	Missouri Department of Revenue	Asset Recovery		4,831.26
9/30/2021	US Bank	Interest Received		0.28
10/6/2021	ECHO	Deductible Recovery		5,000.00
10/7/2021	Payroll transfer	Outsourced Claims Staff	4,319.81	
10/8/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	640.44	
10/8/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	3,238.10	
10/8/2021	Sarah Scheib	Administrative Expense	81.42	
10/8/2021	Norman Hanson & DeTroy, LLC	LAE (40% Initial Distribution)	551.20	
10/8/2021	Horn Aylward & Bandy, LLC	LAE (40% Initial Distribution)	1,233.35	
10/8/2021	Cassiday Schade LLP	LAE (40% Initial Distribution)	104.00	
10/8/2021	HeplerBroom LLC	LAE (40% Initial Distribution)	1,577.48	
10/13/2021	Rackemann Sawyer & Brewster	Administrative Expense	6,472.50	
10/13/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	932.90	
10/18/2021	EMC Insurance Companies	Asset Recovery		741.00
10/21/2021	HCutt, LLC	Administrative Expense	820.00	
10/22/2021	Payroll transfer	Outsourced Claims Staff	4,348.18	
10/26/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	932.90	
10/26/2021	Richards & Connor	LAE (40% Initial Distribution)	2,899.82	
10/26/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	196.00	
10/26/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	438.36	
10/26/2021	Horn Aylward & Bandy, LLC	LAE (40% Initial Distribution)	513.80	
10/26/2021	George J Terranova	LAE (40% Initial Distribution)	6,300.00	
10/26/2021	Leib Knott Gaynor LLC	LAE (40% Initial Distribution)	3,568.40	
10/29/2021	EMC Insurance Companies	Asset Recovery		173.00
10/31/2021	US Bank	Interest Received		0.31
11/3/2021	Law Office of Robin M. Barclay	Loss (40% Initial Distribution)	64,000.00	

Date	Payee/Payor	Description	Disbursements	Receipts
11/4/2021	ECHO	Deductible Recovery		5,000.00
11/4/2021	Payroll transfer	Outsourced Claims Staff	4,348.16	
11/5/2021	SustainableHR PEO, LLC	Outsourced Claims Staff	1,065.27	
11/5/2021	HCutt, LLC	Administrative Expense	820.00	
11/5/2021	Kollath & Associates CPA LLC	Outsourced Claims Staff	2,602.25	
11/9/2021	McGrath Assoc. Claims & Risk Serv. Inc.	Administrative Expense	2,275.00	
11/9/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	932.90	
11/9/2021	Steiner, Donald J. - MD	LAE (40% Initial Distribution)	910.00	
11/9/2021	Gordon Sze	LAE (40% Initial Distribution)	3,564.00	
11/9/2021	Explico Engineering Co.	LAE (40% Initial Distribution)	1,139.00	
11/9/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	3,092.91	
11/9/2021	Cichon, Mark E. - D.O.	LAE (40% Initial Distribution)	280.00	
11/9/2021	HeplerBroom LLC	LAE (40% Initial Distribution)	1,649.92	
11/9/2021	Kinthead & Stilz, PLLC	LAE (40% Initial Distribution)	1,391.60	
11/9/2021	Horn Aylward & Bandy, LLC	LAE (40% Initial Distribution)	336.60	
11/9/2021	Norman Hanson & DeTroy, LLC	LAE (40% Initial Distribution)	2,425.08	
11/12/2021	Rackemann Sawyer & Brewster	Administrative Expense	8,102.50	
11/12/2021	Sarah Scheib	Administrative Expense	45.55	
11/17/2021	US Bank	Corporate Credit Card	864.33	
11/18/2021	Payroll transfer	Outsourced Claims Staff	4,348.16	
11/23/2021	Kollath & Associates CPA LLC	Accounting & Mgmt. Services	932.90	
11/23/2021	Bradford Wendell Cotton	LAE (40% Initial Distribution)	2,135.95	
11/23/2021	Cassiday Schade LLP	LAE (40% Initial Distribution)	20,932.33	
11/23/2021	Immediate Health Associates, Inc.	LAE (40% Initial Distribution)	2,135.95	
11/23/2021	Kinthead & Stilz, PLLC	LAE (40% Initial Distribution)	277.20	
11/23/2021	Norman Hanson & DeTroy, LLC	LAE (40% Initial Distribution)	16,529.45	
11/23/2021	Richards & Connor	LAE (40% Initial Distribution)	2,067.91	
11/23/2021	Clement Rivers, LLP	LAE (40% Initial Distribution)	137.00	
11/23/2021	Superior Court Reports, Inc.	LAE (40% Initial Distribution)	1,671.60	
11/23/2021	Olympia Emergency Services, PLLC	LAE (40% Initial Distribution)	2,547.16	
11/23/2021	George J Terranova	LAE (40% Initial Distribution)	900.00	
11/23/2021	Morrison Mahoney L.L.P.	LAE (40% Initial Distribution)	2,291.20	
11/30/2021	US Bank	Bank Fees	880.40	
11/30/2021	US Bank	Interest Received		0.32
<b>TOTAL</b>			<b>1,282,051.22</b>	<b>63,437.90</b>