



PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

ANNUAL STATEMENT
FOR THE YEAR ENDED DECEMBER 31, 2021
OF THE CONDITION AND AFFAIRS OF THE
Citizens Insurance Company of America

NAIC Group Code 0088 (Current) 0088 (Prior) NAIC Company Code 31534 Employer's ID Number 38-0421730

Organized under the Laws of Michigan, State of Domicile or Port of Entry MI
Country of Domicile United States of America

Incorporated/Organized 05/29/1974 Commenced Business 08/08/1974

Statutory Home Office 808 North Highlander Way, Howell, MI, US 48843-1070
(Street and Number) (City or Town, State, Country and Zip Code)

Main Administrative Office 440 Lincoln Street, Worcester, MA, US 01653-0002
(Street and Number) (City or Town, State, Country and Zip Code)
508-853-7200 (Area Code) (Telephone Number)

Mail Address 440 Lincoln Street, Worcester, MA, US 01653-0002
(Street and Number or P.O. Box) (City or Town, State, Country and Zip Code)

Primary Location of Books and Records 440 Lincoln Street, Worcester, MA, US 01653-0002
(Street and Number) (City or Town, State, Country and Zip Code)
508-853-7200-8557928 (Area Code) (Telephone Number)

Internet Website Address WWW.HANOVER.COM

Statutory Statement Contact Dennis M. Hazelwood, 508-853-7200-8557928
(Name) (Area Code) (Telephone Number)
DHAZELWOOD@HANOVER.COM, 508-853-6332
(E-mail Address) (FAX Number)

OFFICERS

President John Conner Roche Vice President & Treasurer Nathaniel William Clarkin #
Senior Vice President & Secretary Charles Frederick Cronin

OTHER

Jeffrey Mark Farber, Executive Vice President & CFO
Willard Ty-Lunn Lee #, Executive Vice President
Mark Joseph Welzenbach, Executive Vice President
Dennis Francis Kerrigan Jr., Executive Vice President & GC
Denise Maureen Lowsley, Executive Vice President
Richard William Lavey, Executive Vice President
Bryan James Salvatore, Executive Vice President

DIRECTORS OR TRUSTEES

Warren Ellison Barnes
Dennis Francis Kerrigan Jr.
Denise Maureen Lowsley
Bryan James Salvatore
Jeffrey Mark Farber
Richard William Lavey
Paul John Mueller
Mark Joseph Welzenbach
Lindsay France Greenfield #
Willard Ty-Lunn Lee #
John Conner Roche

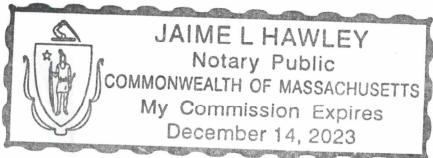
State of Massachusetts SS
County of Worcester

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC Annual Statement Instructions and Accounting Practices and Procedures manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

John Conner Roche
Charles Frederick Cronin
Nathan William Clarkin
President
Senior Vice President & Secretary
Vice President & Treasurer

Subscribed and sworn to before me this 2nd day of February, 2022
Jaime L. Hawley
Notary
December 14, 2023

- a. Is this an original filing? Yes [X] No []
b. If no,
1. State the amendment number.....
2. Date filed.....
3. Number of pages attached.....



ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

ASSETS

	Current Year			Prior Year
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
1. Bonds (Schedule D)	1,128,784,182	0	1,128,784,182	1,151,394,902
2. Stocks (Schedule D):				
2.1 Preferred stocks	0	0	0	0
2.2 Common stocks	168,027,072	0	168,027,072	146,509,455
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens	0	0	0	0
3.2 Other than first liens	0	0	0	0
4. Real estate (Schedule A):				
4.1 Properties occupied by the company (less \$0 encumbrances)	3,561,663	0	3,561,663	4,195,752
4.2 Properties held for the production of income (less \$0 encumbrances)	0	0	0	0
4.3 Properties held for sale (less \$0 encumbrances)	0	0	0	0
5. Cash (\$36,201,979 , Schedule E - Part 1), cash equivalents (\$7,838 , Schedule E - Part 2) and short-term investments (\$0 , Schedule DA)	36,209,817	0	36,209,817	(15,369,562)
6. Contract loans (including \$0 premium notes)	0	0	0	0
7. Derivatives (Schedule DB)	0	0	0	0
8. Other invested assets (Schedule BA)	78,171,086	0	78,171,086	82,848,895
9. Receivable for securities	148,043	0	148,043	100,000
10. Securities lending reinvested collateral assets (Schedule DL)	0	0	0	0
11. Aggregate write-ins for invested assets	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11)	1,414,901,863	0	1,414,901,863	1,369,679,443
13. Title plants less \$0 charged off (for Title insurers only)	0	0	0	0
14. Investment income due and accrued	7,511,890	0	7,511,890	7,997,235
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	1,428,626	476,861	951,765	2,408,520
15.2 Deferred premiums and agents' balances and installments booked but deferred and not yet due (including \$0 earned but unbilled premiums)	251,522,513	0	251,522,513	248,851,652
15.3 Accrued retrospective premiums (\$0) and contracts subject to redetermination (\$0)	0	0	0	0
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	50,912,744	0	50,912,744	36,935,896
16.2 Funds held by or deposited with reinsured companies	0	0	0	0
16.3 Other amounts receivable under reinsurance contracts	0	0	0	0
17. Amounts receivable relating to uninsured plans	0	0	0	0
18.1 Current federal and foreign income tax recoverable and interest thereon	0	0	0	889,063
18.2 Net deferred tax asset	9,897,301	0	9,897,301	13,195,670
19. Guaranty funds receivable or on deposit	8,809	0	8,809	12,317
20. Electronic data processing equipment and software	43,137,793	43,137,793	0	0
21. Furniture and equipment, including health care delivery assets (\$0)	89,686	89,686	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates	0	0	0	0
23. Receivables from parent, subsidiaries and affiliates	34,199,505	0	34,199,505	21,520,506
24. Health care (\$0) and other amounts receivable	0	0	0	0
25. Aggregate write-ins for other than invested assets	244,354,299	172,216	244,182,083	52,700,594
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	2,057,965,029	43,876,556	2,014,088,473	1,754,190,896
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0	0	0
28. Total (Lines 26 and 27)	2,057,965,029	43,876,556	2,014,088,473	1,754,190,896
DETAILS OF WRITE-INS				
1101.	0	0	0	0
1102.				
1103.				
1198. Summary of remaining write-ins for Line 11 from overflow page	0	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198)(Line 11 above)	0	0	0	0
2501. Miscellaneous Accounts Receivable	65,093,179	172,216	64,920,963	52,700,594
2502. Michigan Catastrophic Claims Association Refund Receivable	179,261,120	0	179,261,120	0
2503.				
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	244,354,299	172,216	244,182,083	52,700,594

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Year	2 Prior Year
1. Losses (Part 2A, Line 35, Column 8)	461,436,879	426,078,481
2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6)	0	0
3. Loss adjustment expenses (Part 2A, Line 35, Column 9)	75,491,264	72,907,701
4. Commissions payable, contingent commissions and other similar charges	39,548,820	50,793,287
5. Other expenses (excluding taxes, licenses and fees)	1,183,937	611,096
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	20,776,931	18,715,806
7.1 Current federal and foreign income taxes (including \$0 on realized capital gains (losses))	4,140,198	0
7.2 Net deferred tax liability	0	0
8. Borrowed money \$0 and interest thereon \$0	0	0
9. Unearned premiums (Part 1A, Line 38, Column 5) (after deducting unearned premiums for ceded reinsurance of \$294,807,680 and including warranty reserves of \$0 and accrued accident and health experience rating refunds including \$0 for medical loss ratio rebate per the Public Health Service Act)	477,882,491	445,138,412
10. Advance premium	7,354,805	5,465,332
11. Dividends declared and unpaid:		
11.1 Stockholders	0	0
11.2 Policyholders	15,000	15,000
12. Ceded reinsurance premiums payable (net of ceding commissions)	(1,305,337)	(4,355,939)
13. Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 20)	0	0
14. Amounts withheld or retained by company for account of others	13,037	14,545
15. Remittances and items not allocated	5,291,517	3,132,901
16. Provision for reinsurance (including \$0 certified) (Schedule F, Part 3, Column 78)	0	0
17. Net adjustments in assets and liabilities due to foreign exchange rates	0	0
18. Drafts outstanding	0	0
19. Payable to parent, subsidiaries and affiliates	0	0
20. Derivatives	0	0
21. Payable for securities	11,092,314	214,944
22. Payable for securities lending	0	0
23. Liability for amounts held under uninsured plans	0	0
24. Capital notes \$0 and interest thereon \$0	0	0
25. Aggregate write-ins for liabilities	182,496,278	2,234,856
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	1,285,418,134	1,020,966,422
27. Protected cell liabilities	0	0
28. Total liabilities (Lines 26 and 27)	1,285,418,134	1,020,966,422
29. Aggregate write-ins for special surplus funds	0	0
30. Common capital stock	3,400,000	3,400,000
31. Preferred capital stock	0	0
32. Aggregate write-ins for other than special surplus funds	0	0
33. Surplus notes	0	0
34. Gross paid in and contributed surplus	150,844,600	150,844,600
35. Unassigned funds (surplus)	574,425,739	578,979,874
36. Less treasury stock, at cost:		
36.10 shares common (value included in Line 30 \$0)	0	0
36.20 shares preferred (value included in Line 31 \$0)	0	0
37. Surplus as regards policyholders (Lines 29 to 35, less 36) (Page 4, Line 39)	728,670,339	733,224,474
38. TOTALS (Page 2, Line 28, Col. 3)	2,014,088,473	1,754,190,896
DETAILS OF WRITE-INS		
2501. Miscellaneous Liabilities	3,235,158	2,234,856
2502. Michigan Catastrophic Claims Association Payable to Policyholder	179,261,120	0
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	182,496,278	2,234,856
2901.	0	0
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998)(Line 29 above)	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298)(Line 32 above)	0	0

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

STATEMENT OF INCOME

	1 Current Year	2 Prior Year
UNDERWRITING INCOME		
1. Premiums earned (Part 1, Line 35, Column 4).....	918,411,993	878,474,117
DEDUCTIONS:		
2. Losses incurred (Part 2, Line 35, Column 7)	587,574,202	492,064,363
3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1)	66,402,692	63,745,108
4. Other underwriting expenses incurred (Part 3, Line 25, Column 2)	244,996,351	231,315,909
5. Aggregate write-ins for underwriting deductions	0	0
6. Total underwriting deductions (Lines 2 through 5)	898,973,245	787,125,380
7. Net income of protected cells	0	0
8. Net underwriting gain or (loss) (Line 1 minus Line 6 plus Line 7)	19,438,748	91,348,737
INVESTMENT INCOME		
9. Net investment income earned (Exhibit of Net Investment Income, Line 17)	61,398,020	48,115,055
10. Net realized capital gains or (losses) less capital gains tax of \$1,265,487 (Exhibit of Capital Gains (Losses))	7,252,433	(2,747,955)
11. Net investment gain (loss) (Lines 9 + 10)	68,650,453	45,367,100
OTHER INCOME		
12. Net gain (loss) from agents' or premium balances charged off (amount recovered \$497,080 amount charged off \$2,198,199)	(1,701,119)	(2,185,187)
13. Finance and service charges not included in premiums	2,609,445	2,780,392
14. Aggregate write-ins for miscellaneous income	218,881	882,198
15. Total other income (Lines 12 through 14)	1,127,207	1,477,403
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	89,216,408	138,193,241
17. Dividends to policyholders	13,062	29,823
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17)	89,203,346	138,163,418
19. Federal and foreign income taxes incurred	17,706,011	29,493,407
20. Net income (Line 18 minus Line 19)(to Line 22)	71,497,335	108,670,011
CAPITAL AND SURPLUS ACCOUNT		
21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2)	733,224,474	707,120,056
22. Net income (from Line 20)	71,497,335	108,670,011
23. Net transfers (to) from Protected Cell accounts	0	0
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$4,229,693	15,911,703	1,848,508
25. Change in net unrealized foreign exchange capital gain (loss)	0	0
26. Change in net deferred income tax	576,464	2,310,355
27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Col. 3)	(1,204,688)	(6,157,936)
28. Change in provision for reinsurance (Page 3, Line 16, Column 2 minus Column 1)	0	0
29. Change in surplus notes	0	0
30. Surplus (contributed to) withdrawn from protected cells	0	0
31. Cumulative effect of changes in accounting principles	0	0
32. Capital changes:		
32.1 Paid in	0	0
32.2 Transferred from surplus (Stock Dividend)	0	0
32.3 Transferred to surplus	0	0
33. Surplus adjustments:		
33.1 Paid in	0	0
33.2 Transferred to capital (Stock Dividend)	0	0
33.3 Transferred from capital	0	0
34. Net remittances from or (to) Home Office	0	0
35. Dividends to stockholders	(90,000,000)	(82,000,000)
36. Change in treasury stock (Page 3, Lines 36.1 and 36.2, Column 2 minus Column 1)	0	0
37. Aggregate write-ins for gains and losses in surplus	(1,334,949)	1,433,481
38. Change in surplus as regards policyholders for the year (Lines 22 through 37)	(4,554,135)	26,104,418
39. Surplus as regards policyholders, December 31 current year (Line 21 plus Line 38) (Page 3, Line 37)	728,670,339	733,224,474
DETAILS OF WRITE-INS		
0501.		
0502.		
0503.		
0598. Summary of remaining write-ins for Line 5 from overflow page	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598)(Line 5 above)	0	0
1401. Miscellaneous Income	218,881	882,198
1402.		
1403.		
1498. Summary of remaining write-ins for Line 14 from overflow page	0	0
1499. Totals (Lines 1401 thru 1403 plus 1498)(Line 14 above)	218,881	882,198
3701. Pensions, Net of Tax	(1,334,949)	1,433,481
3702.	0	0
3703.		
3798. Summary of remaining write-ins for Line 37 from overflow page	0	0
3799. Totals (Lines 3701 thru 3703 plus 3798)(Line 37 above)	(1,334,949)	1,433,481

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

CASH FLOW

	1	2
	Current Year	Prior Year
Cash from Operations		
1. Premiums collected net of reinsurance	957,239,633	897,293,783
2. Net investment income	62,367,506	48,931,823
3. Miscellaneous income	1,615,604	1,290,291
4. Total (Lines 1 through 3)	1,021,222,743	947,515,897
5. Benefit and loss related payments	566,192,651	476,083,757
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0
7. Commissions, expenses paid and aggregate write-ins for deductions	317,425,981	280,134,156
8. Dividends paid to policyholders	13,062	29,823
9. Federal and foreign income taxes paid (recovered) net of \$1,265,487 tax on capital gains (losses)	13,942,237	31,478,209
10. Total (Lines 5 through 9)	897,573,931	787,725,946
11. Net cash from operations (Line 4 minus Line 10)	123,648,812	159,789,951
Cash from Investments		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds	229,860,681	208,225,150
12.2 Stocks	20,840,453	20,178,961
12.3 Mortgage loans	0	0
12.4 Real estate	0	0
12.5 Other invested assets	17,207,296	5,525,715
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments	0	0
12.7 Miscellaneous proceeds	10,830,561	0
12.8 Total investment proceeds (Lines 12.1 to 12.7)	278,738,991	233,929,826
13. Cost of investments acquired (long-term only):		
13.1 Bonds	293,212,312	337,918,739
13.2 Stocks	13,034,549	8,639,182
13.3 Mortgage loans	0	0
13.4 Real estate	0	0
13.5 Other invested assets	14,644,254	13,886,909
13.6 Miscellaneous applications	0	13,871
13.7 Total investments acquired (Lines 13.1 to 13.6)	320,891,115	360,458,702
14. Net increase (decrease) in contract loans and premium notes	0	0
15. Net cash from investments (Line 12.8 minus Line 13.7 minus Line 14)	(42,152,124)	(126,528,875)
Cash from Financing and Miscellaneous Sources		
16. Cash provided (applied):		
16.1 Surplus notes, capital notes	0	0
16.2 Capital and paid in surplus, less treasury stock	0	0
16.3 Borrowed funds	0	0
16.4 Net deposits on deposit-type contracts and other insurance liabilities	0	0
16.5 Dividends to stockholders	2,438,373	27,529,218
16.6 Other cash provided (applied)	(27,478,936)	(11,803,201)
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6)	(29,917,309)	(39,332,419)
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS		
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	51,579,378	(6,071,343)
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year	(15,369,562)	(9,298,218)
19.2 End of period (Line 18 plus Line 19.1)	36,209,817	(15,369,562)
Note: Supplemental disclosures of cash flow information for non-cash transactions:		
20.0001. Bonds sold in settlement of intercompany dividend	(87,037,902)	(53,998,467)
20.0002. Accrued interest on bonds sold in settlement of intercompany dividend	(523,725)	(472,315)

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1 - PREMIUMS EARNED

Line of Business		1 Net Premiums Written per Column 6, Part 1B	2 Unearned Premiums Dec. 31 Prior Year - per Col. 3, Last Year's Part 1	3 Unearned Premiums Dec. 31 Current Year - per Col. 5 Part 1A	4 Premiums Earned During Year (Cols. 1 + 2 - 3)
1.	Fire	1,142,870	702,758	831,210	1,014,418
2.	Allied lines	2,518,546	1,482,733	1,783,645	2,217,634
3.	Farmowners multiple peril	0	0	0	0
4.	Homeowners multiple peril	299,813,077	148,460,741	159,138,689	289,135,129
5.	Commercial multiple peril	27,340,941	14,248,181	14,202,756	27,386,366
6.	Mortgage guaranty	0	0	0	0
8.	Ocean marine	0	0	0	0
9.	Inland marine	11,136,430	5,244,900	5,889,849	10,491,481
10.	Financial guaranty	0	0	0	0
11.1	Medical professional liability - occurrence	0	0	0	0
11.2	Medical professional liability - claims-made	0	0	0	0
12.	Earthquake	754,735	385,502	357,468	782,769
13.	Group accident and health	0	0	0	0
14.	Credit accident and health (group and individual)	0	0	0	0
15.	Other accident and health	0	0	0	0
16.	Workers' compensation	5,413,620	2,109,819	1,966,077	5,557,362
17.1	Other liability - occurrence	19,025,437	8,777,592	10,777,161	17,025,868
17.2	Other liability - claims-made	151,136	53,239	63,907	140,468
17.3	Excess workers' compensation	0	0	0	0
18.1	Products liability - occurrence	572,026	123,565	123,679	571,912
18.2	Products liability - claims-made	0	0	0	0
19.1, 19.2	Private passenger auto liability	292,371,855	134,274,822	141,914,997	284,731,680
19.3, 19.4	Commercial auto liability	691,226	540,150	388,186	843,190
21.	Auto physical damage	290,222,720	128,733,748	140,444,143	278,512,325
22.	Aircraft (all perils)	0	0	0	0
23.	Fidelity	0	0	0	0
24.	Surety	0	0	0	0
26.	Burglary and theft	1,453	662	724	1,391
27.	Boiler and machinery	0	0	0	0
28.	Credit	0	0	0	0
29.	International	0	0	0	0
30.	Warranty	0	0	0	0
31.	Reinsurance - nonproportional assumed property	0	0	0	0
32.	Reinsurance - nonproportional assumed liability	0	0	0	0
33.	Reinsurance - nonproportional assumed financial lines	0	0	0	0
34.	Aggregate write-ins for other lines of business	0	0	0	0
35.	TOTALS	951,156,072	445,138,412	477,882,491	918,411,993
DETAILS OF WRITE-INS					
3401.				
3402.				
3403.				
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0
3499.	Totals (Lines 3401 thru 3403 plus 3498)(Line 34 above)	0	0	0	0

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1A - RECAPITULATION OF ALL PREMIUMS

Line of Business		1	2	3	4	5
		Amount Unearned (Running One Year or Less from Date of Policy) (a)	Amount Unearned (Running More Than One Year from Date of Policy) (a)	Earned But Unbilled Premium	Reserve for Rate Credits and Retrospective Adjustments Based on Experience	Total Reserve for Unearned Premiums Cols. 1 + 2 + 3 + 4
1.	Fire	831,210	0	0	0	831,210
2.	Allied lines	1,783,645	0	0	0	1,783,645
3.	Farmowners multiple peril	0	0	0	0	0
4.	Homeowners multiple peril	159,138,689	0	0	0	159,138,689
5.	Commercial multiple peril	14,202,756	0	0	0	14,202,756
6.	Mortgage guaranty	0	0	0	0	0
8.	Ocean marine	0	0	0	0	0
9.	Inland marine	5,889,849	0	0	0	5,889,849
10.	Financial guaranty	0	0	0	0	0
11.1	Medical professional liability - occurrence	0	0	0	0	0
11.2	Medical professional liability - claims-made	0	0	0	0	0
12.	Earthquake	357,468	0	0	0	357,468
13.	Group accident and health	0	0	0	0	0
14.	Credit accident and health (group and individual)	0	0	0	0	0
15.	Other accident and health	0	0	0	0	0
16.	Workers' compensation	1,966,077	0	0	0	1,966,077
17.1	Other liability - occurrence	10,777,161	0	0	0	10,777,161
17.2	Other liability - claims-made	63,907	0	0	0	63,907
17.3	Excess workers' compensation	0	0	0	0	0
18.1	Products liability - occurrence	123,679	0	0	0	123,679
18.2	Products liability - claims-made	0	0	0	0	0
19.1, 19.2	Private passenger auto liability	141,914,997	0	0	0	141,914,997
19.3, 19.4	Commercial auto liability	388,186	0	0	0	388,186
21.	Auto physical damage	140,444,143	0	0	0	140,444,143
22.	Aircraft (all perils)	0	0	0	0	0
23.	Fidelity	0	0	0	0	0
24.	Surety	0	0	0	0	0
26.	Burglary and theft	724	0	0	0	724
27.	Boiler and machinery	0	0	0	0	0
28.	Credit	0	0	0	0	0
29.	International	0	0	0	0	0
30.	Warranty	0	0	0	0	0
31.	Reinsurance - nonproportional assumed property	0	0	0	0	0
32.	Reinsurance - nonproportional assumed liability	0	0	0	0	0
33.	Reinsurance - nonproportional assumed financial lines	0	0	0	0	0
34.	Aggregate write-ins for other lines of business	0	0	0	0	0
35.	TOTALS	477,882,491	0	0	0	477,882,491
36.	Accrued retrospective premiums based on experience					0
37.	Earned but unbilled premiums					0
38.	Balance (Sum of Line 35 through 37)					477,882,491
DETAILS OF WRITE-INS						
3401.					
3402.					
3403.					
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0	0
3499.	Totals (Lines 3401 thru 3403 plus 3498)(Line 34 above)	0	0	0	0	0

(a) State here basis of computation used in each case Data furnished by ceding organizations for unaffiliated assumed business. All other on daily pro-rata basis.

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ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

UNDERWRITING AND INVESTMENT EXHIBIT

PART 1B - PREMIUMS WRITTEN						
Line of Business	1	Reinsurance Assumed		Reinsurance Ceded		6
	Direct Business (a)	2	3	4	5	Net Premiums Written Cols. 1+2+3-4-5
1. Fire	5,871,594	978,649	18,581	5,214,036	511,918	1,142,870
2. Allied lines	6,887,936	2,169,278	6,965	5,747,399	798,234	2,518,546
3. Farmowners multiple peril	0	0	0	0	0	0
4. Homeowners multiple peril	204,621,064	163,265,926	0	64,002,003	4,071,910	299,813,077
5. Commercial multiple peril	368,315,244	636,120	0	335,433,976	6,176,447	27,340,941
6. Mortgage guaranty	0	0	0	0	0	0
8. Ocean marine	0	0	0	0	0	0
9. Inland marine	6,099,033	7,104,465	0	1,915,238	151,830	11,136,430
10. Financial guaranty	0	0	0	0	0	0
11.1 Medical professional liability - occurrence	0	0	0	0	0	0
11.2 Medical professional liability - claims-made	0	0	0	0	0	0
12. Earthquake	2,944,016	499,024	0	2,683,275	5,030	754,735
13. Group accident and health	0	0	0	0	0	0
14. Credit accident and health (group and individual)	0	0	0	0	0	0
15. Other accident and health	0	0	0	0	0	0
16. Workers' compensation	55,336,566	1,398,632	841,123	52,323,221	(160,520)	5,413,620
17.1 Other liability - occurrence	20,395,463	10,685,506	0	6,837,663	5,217,869	19,025,437
17.2 Other liability - claims-made	476,963	0	0	325,827	0	151,136
17.3 Excess workers' compensation	0	0	0	0	0	0
18.1 Products liability - occurrence	2,994,016	(642)	0	2,421,348	0	572,026
18.2 Products liability - claims-made	0	0	0	0	0	0
19.1, 19.2 Private passenger auto liability	60,904,275	324,612,482	0	60,823,786	32,321,116	292,371,855
19.3, 19.4 Commercial auto liability	6,962,629	36,814	211,532	6,471,780	47,969	691,226
21. Auto physical damage	59,672,241	290,106,240	88,340	59,206,948	437,153	290,222,720
22. Aircraft (all perils)	0	0	0	0	0	0
23. Fidelity	28,516	0	0	28,516	0	0
24. Surety	114,004	0	0	114,004	0	0
26. Burglary and theft	52,166	0	58	50,652	119	1,453
27. Boiler and machinery	862,159	0	0	679,623	182,536	0
28. Credit	0	0	0	0	0	0
29. International	0	0	0	0	0	0
30. Warranty	0	0	0	0	0	0
31. Reinsurance - nonproportional assumed property	XXX	0	0	0	0	0
32. Reinsurance - nonproportional assumed liability	XXX	0	0	0	0	0
33. Reinsurance - nonproportional assumed financial lines	XXX	0	0	0	0	0
34. Aggregate write-ins for other lines of business	0	0	0	0	0	0
35. TOTALS	802,537,885	801,492,494	1,166,599	604,279,295	49,761,611	951,156,072
DETAILS OF WRITE-INS						
3401.						
3402.						
3403.						
3498. Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0	0	0
3499. Totals (Lines 3401 thru 3403 plus 3498)(Line 34 above)	0	0	0	0	0	0

(a) Does the company's direct premiums written include premiums recorded on an installment basis? Yes [] No [X]

If yes: 1. The amount of such installment premiums \$0

 2. Amount at which such installment premiums would have been reported had they been reported on an annualized basis \$0

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2 - LOSSES PAID AND INCURRED

		Losses Paid Less Salvage				5	6	7	8
		1	2	3	4				
Line of Business		Direct Business	Reinsurance Assumed	Reinsurance Recovered	Net Payments (Cols. 1 + 2 - 3)	Net Losses Unpaid Current Year (Part 2A , Col. 8)	Net Losses Unpaid Prior Year	Losses Incurred Current Year (Cols. 4 + 5 - 6)	Percentage of Losses Incurred (Col. 7, Part 2) to Premiums Earned (Col. 4, Part 1)
1.	Fire	1,263,225	1,587,312	1,072,370	1,778,167	358,602	297,287	1,839,482	181.3
2.	Allied lines	1,511,288	377,152	1,462,805	425,635	9,735	62,879	372,491	16.8
3.	Farmowners multiple peril	0	0	0	0	0	0	0	0.0
4.	Homeowners multiple peril	123,230,890	121,272,133	21,933,909	222,569,114	92,982,519	76,900,956	238,650,677	82.5
5.	Commercial multiple peril	178,892,754	118,071	158,963,358	20,047,467	26,853,461	28,284,487	18,616,441	68.0
6.	Mortgage guaranty	0	0	0	0	0	0	0	0.0
8.	Ocean marine	0	0	0	0	0	0	0	0.0
9.	Inland marine	1,097,136	1,653,501	233,480	2,517,157	588,117	456,029	2,649,245	25.3
10.	Financial guaranty	0	0	0	0	0	0	0	0.0
11.1	Medical professional liability - occurrence	0	0	0	0	0	0	0	0.0
11.2	Medical professional liability - claims-made	0	0	0	0	0	0	0	0.0
12.	Earthquake	0	0	0	0	33,028	19,321	13,707	1.8
13.	Group accident and health	0	0	0	0	0	0	0	0.0
14.	Credit accident and health (group and individual)	0	0	0	0	0	0	0	0.0
15.	Other accident and health	0	0	0	0	0	0	0	0.0
16.	Workers' compensation	30,930,873	1,355,163	29,788,653	2,497,383	16,545,808	17,836,985	1,206,206	21.7
17.1	Other liability - occurrence	4,296,213	5,000	4,145,238	155,975	19,994,014	10,245,152	9,904,837	58.2
17.2	Other liability - claims-made	146,719	0	95,000	51,719	11,196	44,808	18,107	12.9
17.3	Excess workers' compensation	169,830	0	(9,313)	179,143	3,931,133	4,810,277	(700,001)	0.0
18.1	Products liability - occurrence	348,043	0	348,044	(1)	481,270	533,634	(52,365)	(9.2)
18.2	Products liability - claims-made	0	0	0	0	0	0	0	0.0
19.1, 19.2	Private passenger auto liability	88,244,667	149,212,130	94,500,520	142,956,277	275,982,808	270,010,175	148,928,910	52.3
19.3, 19.4	Commercial auto liability	5,951,732	393,423	5,938,224	406,931	1,938,598	2,027,862	317,667	37.7
21.	Auto physical damage	28,222,347	158,534,203	28,125,713	158,630,837	21,726,375	14,548,423	165,808,789	59.5
22.	Aircraft (all perils)	0	0	0	0	0	0	0	0.0
23.	Fidelity	0	0	0	0	0	0	0	0.0
24.	Surety	(5,760)	0	(5,760)	0	0	0	0	0.0
26.	Burglary and theft	0	0	0	0	215	206	9	0.6
27.	Boiler and machinery	130,661	0	130,661	0	0	0	0	0.0
28.	Credit	0	0	0	0	0	0	0	0.0
29.	International	0	0	0	0	0	0	0	0.0
30.	Warranty	0	0	0	0	0	0	0	0.0
31.	Reinsurance - nonproportional assumed property	XXX	0	0	0	0	0	0	0.0
32.	Reinsurance - nonproportional assumed liability	XXX	0	0	0	0	0	0	0.0
33.	Reinsurance - nonproportional assumed financial lines	XXX	0	0	0	0	0	0	0.0
34.	Aggregate write-ins for other lines of business	0	0	0	0	0	0	0	0.0
35.	TOTALS	464,430,618	434,508,088	346,722,902	552,215,804	461,436,879	426,078,481	587,574,202	64.0
DETAILS OF WRITE-INS									
3401.								
3402.								
3403.								
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0	0	0	0	0.0
3499.	Totals (Lines 3401 thru 3403 plus 3498)(Line 34 above)	0	0	0	0	0	0	0	0.0

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

UNDERWRITING AND INVESTMENT EXHIBIT

PART 2A - UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

Line of Business		Reported Losses				Incurred But Not Reported			8	9
		1	2	3	4	5	6	7		
		Direct	Reinsurance Assumed	Deduct Reinsurance Recoverable	Net Losses Excl. Incurred But Not Reported (Cols. 1 + 2 - 3)	Direct	Reinsurance Assumed	Reinsurance Ceded	Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	Net Unpaid Loss Adjustment Expenses
1.	Fire	520,581	324,554	511,093	334,042	553,206	59,804	588,450	358,602	28,453
2.	Allied lines	1,427,380	1,116	1,429,300	(804)	575,785	72,036	637,282	9,735	35,480
3.	Farmowners multiple peril	0	0	0	0	0	0	0	0	0
4.	Homeowners multiple peril	31,491,743	24,340,909	8,949,018	46,883,634	34,580,796	19,834,368	8,316,279	92,982,519	5,234,763
5.	Commercial multiple peril	232,474,730	246,250	215,325,293	17,395,687	150,413,054	244,648	141,199,928	26,853,461	8,101,062
6.	Mortgage guaranty	0	0	0	0	0	0	0	0	0
8.	Ocean marine	0	0	0	0	0	0	0	0	0
9.	Inland marine	97,267	72,602	24,628	145,241	248,132	256,518	61,774	588,117	99,585
10.	Financial guaranty	0	0	0	0	0	0	0	0	0
11.1	Medical professional liability - occurrence	0	0	0	0	0	0	0	0	0
11.2	Medical professional liability - claims-made	0	0	0	0	0	0	0	0	0
12.	Earthquake	0	0	0	0	114,744	20,959	102,675	33,028	6,121
13.	Group accident and health	0	0	0	0	0	0	0	(a)	0
14.	Credit accident and health (group and individual)	0	0	0	0	0	0	0	0	0
15.	Other accident and health	0	0	0	0	0	0	0	(a)	0
16.	Workers' compensation	80,515,025	7,139,079	78,440,138	9,213,966	43,211,554	3,952,695	39,832,407	16,545,808	912,405
17.1	Other liability - occurrence	16,531,867	866,000	14,455,376	2,942,491	26,275,882	6,422,017	15,646,376	19,994,014	753,475
17.2	Other liability - claims-made	391,033	0	381,033	10,000	120,101	0	118,905	11,196	41,587
17.3	Excess workers' compensation	2,703,757	0	1,326,512	1,377,245	15,205,385	0	12,651,497	3,931,133	1,833,997
18.1	Products liability - occurrence	1,167,610	0	1,117,610	50,000	3,981,904	544	3,551,178	481,270	370,717
18.2	Products liability - claims-made	0	0	0	0	0	0	0	0	0
19.1, 19.2	Private passenger auto liability	161,127,975	183,325,535	200,970,676	143,482,834	434,982,611	392,152,579	694,635,216	275,982,808	56,420,652
19.3, 19.4	Commercial auto liability	10,638,631	726,672	10,723,485	641,818	6,856,356	304,955	5,864,531	1,938,598	46,202
21.	Auto physical damage	2,073,512	9,738,109	1,999,874	9,811,747	26,292	11,930,155	41,819	21,726,375	1,606,681
22.	Aircraft (all perils)	0	0	0	0	0	0	0	0	0
23.	Fidelity	1	0	1	0	(87,314)	0	(87,314)	0	0
24.	Surety	66	0	66	0	245,186	0	245,186	0	0
26.	Burglary and theft	0	0	0	0	28,365	0	28,150	215	84
27.	Boiler and machinery	0	0	0	0	0	0	0	0	0
28.	Credit	0	0	0	0	0	0	0	0	0
29.	International	0	0	0	0	0	0	0	0	0
30.	Warranty	0	0	0	0	0	0	0	0	0
31.	Reinsurance - nonproportional assumed property	XXX	0	0	0	XXX	0	0	0	0
32.	Reinsurance - nonproportional assumed liability	XXX	0	0	0	XXX	0	0	0	0
33.	Reinsurance - nonproportional assumed financial lines	XXX	0	0	0	XXX	0	0	0	0
34.	Aggregate write-ins for other lines of business	0	0	0	0	0	0	0	0	0
35.	TOTALS	541,161,178	226,780,826	535,654,103	232,287,901	717,332,039	435,251,278	923,434,339	461,436,879	75,491,264
DETAILS OF WRITE-INS										
3401.									
3402.									
3403.									
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0	0	0	0	0	0
3499.	Totals (Lines 3401 thru 3403 plus 3498)(Line 34 above)	0	0	0	0	0	0	0	0	0

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

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

UNDERWRITING AND INVESTMENT EXHIBIT

PART 3 - EXPENSES

	1	2	3	4
	Loss Adjustment Expenses	Other Underwriting Expenses	Investment Expenses	Total
1. Claim adjustment services:				
1.1 Direct	50,287,530	0	0	50,287,530
1.2 Reinsurance assumed	18,319,366	0	0	18,319,366
1.3 Reinsurance ceded	42,543,523	0	0	42,543,523
1.4 Net claim adjustment service (1.1 + 1.2 - 1.3)	26,063,373	0	0	26,063,373
2. Commission and brokerage:				
2.1 Direct excluding contingent	0	114,528,382	0	114,528,382
2.2 Reinsurance assumed, excluding contingent	0	92,092,228	0	92,092,228
2.3 Reinsurance ceded, excluding contingent	0	91,917,309	0	91,917,309
2.4 Contingent - direct	0	20,135,523	0	20,135,523
2.5 Contingent - reinsurance assumed	0	23,680,727	0	23,680,727
2.6 Contingent - reinsurance ceded	0	16,121,409	0	16,121,409
2.7 Policy and membership fees	0	0	0	0
2.8 Net commission and brokerage (2.1 + 2.2 - 2.3 + 2.4 + 2.5 - 2.6 + 2.7)	0	142,398,142	0	142,398,142
3. Allowances to managers and agents	84,962	464,553	0	549,515
4. Advertising	26,089	187,769	668	214,526
5. Boards, bureaus and associations	0	3,025,706	0	3,025,706
6. Surveys and underwriting reports	0	4,296,136	0	4,296,136
7. Audit of assureds' records	0	(822)	0	(822)
8. Salary and related items:				
8.1 Salaries	23,560,042	42,962,604	888,207	67,410,853
8.2 Payroll taxes	2,088,527	3,808,507	78,737	5,975,771
9. Employee relations and welfare	3,245,223	5,588,852	92,625	8,926,700
10. Insurance	219,932	473,848	0	693,780
11. Directors' fees	0	0	0	0
12. Travel and travel items	1,003,807	430,110	5,170	1,439,087
13. Rent and rent items	1,329,383	1,950,197	210,186	3,489,766
14. Equipment	2,581,812	6,925,647	191,559	9,699,018
15. Cost or depreciation of EDP equipment and software	1,311,309	8,739,931	2,752	10,053,992
16. Printing and stationery	117,393	423,767	1,366	542,526
17. Postage, telephone and telegraph, exchange and express	532,036	2,359,400	2,832	2,894,268
18. Legal and auditing	293,481	493,250	12,146	798,877
19. Totals (Lines 3 to 18)	36,393,996	82,129,455	1,486,248	120,009,699
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of \$0	0	12,180,994	0	12,180,994
20.2 Insurance department licenses and fees	0	198,856	0	198,856
20.3 Gross guaranty association assessments	0	0	0	0
20.4 All other (excluding federal and foreign income and real estate)	0	38,918	0	38,918
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4)	0	12,418,768	0	12,418,768
21. Real estate expenses	0	0	0	0
22. Real estate taxes	0	0	485,794	485,794
23. Reimbursements by uninsured plans	0	0	0	0
24. Aggregate write-ins for miscellaneous expenses	3,945,323	8,049,986	428,244	12,423,553
25. Total expenses incurred	66,402,692	244,996,351	2,400,286 (a)	313,799,329
26. Less unpaid expenses - current year	75,491,264	61,509,688	0	137,000,952
27. Add unpaid expenses - prior year	72,907,701	70,120,189	0	143,027,890
28. Amounts receivable relating to uninsured plans, prior year	0	0	0	0
29. Amounts receivable relating to uninsured plans, current year	0	0	0	0
30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29)	63,819,129	253,606,852	2,400,286	319,826,267
DETAILS OF WRITE-INS				
2401. Outside Consulting Fees	2,213,071	2,495,167	14,164	4,722,402
2402. SOP 98-1 Capitalization Software	(3,040,144)	(7,520,208)	0	(10,560,352)
2403. Temporary help	968,041	1,073,777	7,194	2,049,012
2498. Summary of remaining write-ins for Line 24 from overflow page	3,804,355	12,001,250	406,886	16,212,491
2499. Totals (Lines 2401 thru 2403 plus 2498)(Line 24 above)	3,945,323	8,049,986	428,244	12,423,553

(a) Includes management fees of \$1,724,892 to affiliates and \$0 to non-affiliates.

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

EXHIBIT OF NET INVESTMENT INCOME

		1	2
		Collected During Year	Earned During Year
1.	U.S. Government bonds	(a)687,256651,757
1.1	Bonds exempt from U.S. tax	(a)66,24443,416
1.2	Other bonds (unaffiliated)	(a)37,664,49737,241,572
1.3	Bonds of affiliates	(a)00
2.1	Preferred stocks (unaffiliated)	(b)00
2.11	Preferred stocks of affiliates	(b)00
2.2	Common stocks (unaffiliated)4,049,9034,046,428
2.21	Common stocks of affiliates00
3.	Mortgage loans	(c)00
4.	Real estate	(d)2,133,7172,133,717
5	Contract loans00
6	Cash, cash equivalents and short-term investments	(e)3,4402,861
7	Derivative instruments	(f)00
8.	Other invested assets20,138,95920,138,959
9.	Aggregate write-ins for investment income173,685173,685
10.	Total gross investment income64,917,70264,432,396
11.	Investment expenses		(g)2,400,286
12.	Investment taxes, licenses and fees, excluding federal income taxes		(g)0
13.	Interest expense		(h)0
14.	Depreciation on real estate and other invested assets		(i)634,090
15.	Aggregate write-ins for deductions from investment income0
16.	Total deductions (Lines 11 through 15)3,034,376
17.	Net investment income (Line 10 minus Line 16)61,398,020
DETAILS OF WRITE-INS			
0901.	Miscellaneous Investment Income173,685173,685
0902.		
0903.		
0998.	Summary of remaining write-ins for Line 9 from overflow page00
0999.	Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above)173,685173,685
1501.		
1502.		
1503.		
1598.	Summary of remaining write-ins for Line 15 from overflow page0
1599.	Totals (Lines 1501 thru 1503 plus 1598) (Line 15, above)0

- (a) Includes \$1,370,838 accrual of discount less \$1,709,012 amortization of premium and less \$417,621 paid for accrued interest on purchases.
- (b) Includes \$0 accrual of discount less \$0 amortization of premium and less \$0 paid for accrued dividends on purchases.
- (c) Includes \$0 accrual of discount less \$0 amortization of premium and less \$0 paid for accrued interest on purchases.
- (d) Includes \$2,133,717 for company's occupancy of its own buildings; and excludes \$0 interest on encumbrances.
- (e) Includes \$1,626 accrual of discount less \$0 amortization of premium and less \$0 paid for accrued interest on purchases.
- (f) Includes \$0 accrual of discount less \$0 amortization of premium.
- (g) Includes \$0 investment expenses and \$0 investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$0 interest on surplus notes and \$0 interest on capital notes.
- (i) Includes \$634,090 depreciation on real estate and \$0 depreciation on other invested assets.

EXHIBIT OF CAPITAL GAINS (LOSSES)

		1	2	3	4	5
		Realized Gain (Loss) On Sales or Maturity	Other Realized Adjustments	Total Realized Capital Gain (Loss) (Columns 1 + 2)	Change in Unrealized Capital Gain (Loss)	Change in Unrealized Foreign Exchange Capital Gain (Loss)
1.	U.S. Government bonds00000
1.1	Bonds exempt from U.S. tax(1,931)0(1,931)00
1.2	Other bonds (unaffiliated)1,955,471(269,643)1,685,827(270,172)0
1.3	Bonds of affiliates00000
2.1	Preferred stocks (unaffiliated)00000
2.11	Preferred stocks of affiliates00000
2.2	Common stocks (unaffiliated)7,014,032(181,244)6,832,78822,490,7330
2.21	Common stocks of affiliates00000
3.	Mortgage loans00000
4.	Real estate00000
5.	Contract loans00000
6.	Cash, cash equivalents and short-term investments00000
7.	Derivative instruments00000
8.	Other invested assets000(2,079,165)0
9.	Aggregate write-ins for capital gains (losses)1,23501,23500
10.	Total capital gains (losses)8,968,807(450,887)8,517,91920,141,3960
DETAILS OF WRITE-INS						
0901.	Prior Year Gains1,23501,23500
0902.					
0903.					
0998.	Summary of remaining write-ins for Line 9 from overflow page00000
0999.	Totals (Lines 0901 thru 0903 plus 0998) (Line 9, above)1,23501,23500

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

EXHIBIT OF NON-ADMITTED ASSETS

	1	2	3
	Current Year Total Nonadmitted Assets	Prior Year Total Nonadmitted Assets	Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D)	0	0	0
2. Stocks (Schedule D):			
2.1 Preferred stocks	0	0	0
2.2 Common stocks	0	0	0
3. Mortgage loans on real estate (Schedule B):			
3.1 First liens	0	0	0
3.2 Other than first liens	0	0	0
4. Real estate (Schedule A):			
4.1 Properties occupied by the company	0	0	0
4.2 Properties held for the production of income	0	0	0
4.3 Properties held for sale	0	0	0
5. Cash (Schedule E - Part 1), cash equivalents (Schedule E - Part 2) and short-term investments (Schedule DA)	0	0	0
6. Contract loans	0	0	0
7. Derivatives (Schedule DB)	0	0	0
8. Other invested assets (Schedule BA)	0	0	0
9. Receivables for securities	0	0	0
10. Securities lending reinvested collateral assets (Schedule DL)	0	0	0
11. Aggregate write-ins for invested assets	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11)	0	0	0
13. Title plants (for Title insurers only)	0	0	0
14. Investment income due and accrued	0	0	0
15. Premiums and considerations:			
15.1 Uncollected premiums and agents' balances in the course of collection	476,861	675,837	198,976
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due	0	0	0
15.3 Accrued retrospective premiums and contracts subject to redetermination	0	0	0
16. Reinsurance:			
16.1 Amounts recoverable from reinsurers	0	0	0
16.2 Funds held by or deposited with reinsured companies	0	0	0
16.3 Other amounts receivable under reinsurance contracts	0	0	0
17. Amounts receivable relating to uninsured plans	0	0	0
18.1 Current federal and foreign income tax recoverable and interest thereon	0	0	0
18.2 Net deferred tax asset	0	0	0
19. Guaranty funds receivable or on deposit	0	0	0
20. Electronic data processing equipment and software	43,137,793	41,704,940	(1,432,853)
21. Furniture and equipment, including health care delivery assets	89,686	143,453	53,767
22. Net adjustment in assets and liabilities due to foreign exchange rates	0	0	0
23. Receivables from parent, subsidiaries and affiliates	0	0	0
24. Health care and other amounts receivable	0	0	0
25. Aggregate write-ins for other than invested assets	172,216	147,638	(24,578)
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	43,876,556	42,671,868	(1,204,688)
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0	0
28. Total (Lines 26 and 27)	43,876,556	42,671,868	(1,204,688)
DETAILS OF WRITE-INS			
1101.			
1102.			
1103.			
1198. Summary of remaining write-ins for Line 11 from overflow page	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198)(Line 11 above)	0	0	0
2501. Miscellaneous Accounts Receivable	172,216	147,638	(24,578)
2502.			
2503.			
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598)(Line 25 above)	172,216	147,638	(24,578)

NOTES TO FINANCIAL STATEMENTS

NOTE 1 Summary of Significant Accounting Policies and Going Concern

A. Accounting Practices

The financial statements of Citizens Insurance Company of America ("the Company") are presented on the basis of accounting practices prescribed or permitted by the State of Michigan Department of Insurance and Financial Services.

The Michigan Department of Insurance and Financial Services recognizes only statutory accounting practices prescribed or permitted by the State of Michigan for determining and reporting the financial condition and results of operations of an insurance company, for determining its solvency under the Michigan Insurance Law. The National Association of Insurance Commissioners ("NAIC") "Accounting Practices and Procedures Manual" ("NAIC SAP") has been adopted as a component of prescribed or permitted practices by the State of Michigan. The State has not adopted any prescribed accounting practices that differ from those found in NAIC SAP.

A reconciliation of the Company's net income and capital and surplus between NAIC SAP and practices prescribed and permitted by the State of Michigan is shown below:

	SSAP #	F/S Page	F/S Line #	2021	2020
NET INCOME					
(1) State basis (Page 4, Line 20, Columns 1 & 2)	XXX	XXX	XXX	\$ 71,497,335	\$ 108,670,011
(2) State Prescribed Practices that are an increase/ (decrease) from NAIC SAP:				-	-
(3) State Permitted Practices that are an increase/(decrease) from NAIC SAP:				-	-
(4) NAIC SAP (1-2-3=4)	XXX	XXX	XXX	<u>\$ 71,497,335</u>	<u>\$ 108,670,011</u>
SURPLUS					
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 728,670,339	\$ 733,224,474
(6) State Prescribed Practices that are an increase/(decrease) from NAIC SAP:				-	-
(7) State Permitted Practices that are an increase/(decrease) from NAIC SAP:				-	-
(8) NAIC SAP (5-6-7=8)	XXX	XXX	XXX	<u>\$ 728,670,339</u>	<u>\$ 733,224,474</u>

B. Use of Estimates in the Preparation of the Financial Statements

The preparation of financial statements in conformity with Statutory Accounting Principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities. It also requires disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

C. Accounting Policy

- (1) Short-term investments are stated at amortized cost.
- (2) Bonds not backed by loans are stated at either amortized cost or fair value, using the scientific interest method, in accordance with the NAIC Purposes and Procedures of the Securities Valuation Office ("SVO").
- (3,4) Common stocks are carried at fair value. The Company does not own any preferred stock.
- (5) The Company does not own any mortgage loans.
- (6) Loan-backed securities are stated at either amortized cost or fair value, in accordance with the NAIC Purposes and Procedures of the SVO.
- (7) The Company does not own any stocks of, or have any interest in, any subsidiaries.
- (8) Other invested assets, including investments in trusts, are recorded using the equity method in accordance with the Statement of Statutory Accounting Principles ("SSAP") No. 48, "Joint Ventures, Partnerships and Limited Liability Companies".
- (9) The Company has not entered into derivative contracts.
- (10) The Company does utilize anticipated investment income as a factor in the premium deficiency calculation.
- (11) Unpaid losses and loss adjustment expenses include an amount determined from individual case estimates and loss reports and an amount, based on past experience, for losses incurred but not reported ("IBNR"). Such liabilities are necessarily based on assumptions and estimates and while management believes the amount is adequate, the ultimate liability may be in excess of or less than the amount provided. The methods for making such estimates and for establishing the resulting liabilities are continually reviewed and any adjustments are reflected in the period determined.
- (12) The Company has not modified its capitalization policy from the prior year.
- (13) The Company does not write major medical insurance with prescription drug coverage.

D. Going Concern

Not applicable

NOTE 2 Accounting Changes and Corrections of Errors

Not applicable

NOTE 3 Business Combinations and Goodwill

Not applicable

NOTES TO FINANCIAL STATEMENTS

NOTE 4 Discontinued Operations

Not applicable

NOTE 5 Investments

A. Mortgage Loans, including Mezzanine Real Estate Loans

The Company does not own any mortgage loans.

B. Debt Restructuring

The Company did not have any restructured debt as of the end of the reporting period.

C. Reverse Mortgages

The Company did not have any reverse mortgages as of the end of the reporting period.

D. Loan-Backed Securities

(1) Prepayment assumptions for loan-backed and structured securities were obtained from prepayment models that are sensitive to refinancing, turnover, equity take-out and other relevant factors. These assumptions are consistent with the current interest rate and economic environment.

(2) Not applicable

(3) The Company had no securities with a recognized other-than-temporary impairment.

(4) All impaired securities (fair value is less than cost or amortized cost) for which an other-than-temporary impairment has not been recognized in earnings as a realized loss (including securities with a recognized other-than-temporary impairment for non-interest related declines when a non-recognized interest related impairment remains):

a) The aggregate amount of unrealized losses:

1. Less than 12 Months	\$	2,474,529
2. 12 Months or Longer	\$	101,693

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

1. Less than 12 Months	\$	134,960,832
2. 12 Months or Longer	\$	1,445,203

(5) The Company employs a systematic methodology to determine if a decline in market value below book/adjusted carrying value is other-than-temporary. In determining whether a decline in fair value below book/adjusted carrying value is other-than-temporary, the Company evaluates several factors and circumstances, including the issuer's overall financial condition; the issuer's credit and financial strength ratings; the issuer's financial performance, including earnings trends, dividend payments, and asset quality; any specific events which may influence the operations of the issuer including governmental actions; a weakening of the general market conditions in the industry or geographic region in which the issuer operates; the length of time and degree to which the fair value of an issuer's securities remains below cost; the Company's intent and ability to hold the security until such time to allow for the expected recovery in value; and with respect to fixed maturity investments, any factors that might raise doubt about the issuer's ability to pay all amounts due according to the contractual terms. These factors are applied to all securities.

E. Dollar Repurchase Agreements and/or Securities Lending Transactions

(1) The Company does not own any repurchase agreements.

(2) The Company has not pledged any of its assets as collateral.

(3) Collateral Received - Not applicable

(4) The Company does not have any securities lending transactions administered by an affiliated agent in which "one-line" reporting of the reinvested collateral is optional.

(5) Collateral Reinvestment - Not applicable

(6) The Company has not accepted collateral that is not permitted by the state contract or custom to sell or repledge.

(7) The Company has no collateral for transactions that extend beyond one year from the reporting date.

F., G., H., I., J., K.

Not applicable

NOTES TO FINANCIAL STATEMENTS

L. Restricted Assets

1. Restricted Assets (Including Pledged)

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted						
	Current Year					6	7
	1	2	3	4	5		
	Total General Account (G/A)	G/A Supporting Protected Cell Account Activity (a)	Total Protected Cell Account Restricted Assets	Protected Cell Account Assets Supporting G/A Activity (b)	Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)
a. Subject to contractual obligation for which liability is not shown	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b. Collateral held under security lending agreements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
c. Subject to repurchase agreements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
d. Subject to reverse repurchase agreements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
e. Subject to dollar repurchase agreements agreements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
g. Placed under option contracts	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
h. Letter stock or securities restricted as to sale - excluding FHLB capital stock	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
i. FHLB capital stock	\$ 479,200	\$ -	\$ -	\$ -	\$ 479,200	\$ 479,200	\$ -
j. On deposit with states	\$ 4,995,333	\$ -	\$ -	\$ -	\$ 4,995,333	\$ 4,867,124	\$ 128,209
k. On deposit with other regulatory bodies	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
l. Pledged collateral to FHLB (including assets backing funding agreements)	\$ 20,683,958	\$ -	\$ -	\$ -	\$ 20,683,958	\$ 18,157,684	\$ 2,526,274
m. Pledged as collateral not captured in other categories	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
n. Other restricted assets	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
o. Total Restricted Assets	\$ 26,158,491	\$ -	\$ -	\$ -	\$ 26,158,491	\$ 23,504,008	\$ 2,654,483

(a) Subset of Column 1

(b) Subset of Column 3

Restricted Asset Category	Current Year			
	8	9	Percentage	
			10	11
			Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)
a. Subject to contractual obligation for which liability is not shown	\$ -	\$ -	0.000%	0.000%
b. Collateral held under security lending agreements	\$ -	\$ -	0.000%	0.000%
c. Subject to repurchase agreements	\$ -	\$ -	0.000%	0.000%
d. Subject to reverse repurchase agreements	\$ -	\$ -	0.000%	0.000%
e. Subject to dollar repurchase agreements agreements	\$ -	\$ -	0.000%	0.000%
g. Placed under option contracts	\$ -	\$ -	0.000%	0.000%
h. Letter stock or securities restricted as to sale - excluding FHLB capital stock	\$ -	\$ -	0.000%	0.000%
i. FHLB capital stock	\$ -	\$ 479,200	0.023%	0.024%
j. On deposit with states	\$ -	\$ 4,995,333	0.243%	0.248%
k. On deposit with other regulatory bodies	\$ -	\$ -	0.000%	0.000%
l. Pledged collateral to FHLB (including assets backing funding agreements)	\$ -	\$ 20,683,958	1.005%	1.027%
m. Pledged as collateral not captured in other categories	\$ -	\$ -	0.000%	0.000%
n. Other restricted assets	\$ -	\$ -	0.000%	0.000%
o. Total Restricted Assets	\$ -	\$ 26,158,491	1.271%	1.299%

(c) Column 5 divided by Asset Page, Column 1, Line 28

(d) Column 9 divided by Asset Page, Column 3, Line 28

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

Not applicable

3. Detail of Other Restricted Assets (Contracts That Share Similar Characteristics, Such as Reinsurance and Derivatives, Are Reported in the Aggregate)

Not applicable

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

Not applicable

M., N., O.

Not applicable

P. Short Sales

Not applicable

NOTES TO FINANCIAL STATEMENTS

Q. Prepayment Penalty and Acceleration Fees

	General Account	Protected Cell
1. Number of CUSIPs	55	\$ -
2. Aggregate Amount of Investment Income	\$ 1,710,419	\$ -

R. Reporting Entity's Share of Cash Pool by Asset Type

Not applicable

NOTE 6 Joint Ventures, Partnerships and Limited Liability Companies

Not applicable

NOTE 7 Investment Income

Not applicable

NOTE 8 Derivative Instruments

Not applicable

NOTE 9 Income Taxes

A. The components of the net deferred tax asset/(liability) at the end of current period are as follows:

1.

	As of End of Current Period			12/31/2020			Change		
	(1) Ordinary	(2) Capital	(3) (Col. 1 + 2) Total	(4) Ordinary	(5) Capital	(6) (Col. 4 + 5) Total	(7) (Col. 1 - 4) Ordinary	(8) (Col. 2 - 5) Capital	(9) (Col. 7 + 8) Total
(a) Gross Deferred Tax Assets	\$ 37,837,866	\$ -	\$ 37,837,866	\$ 36,856,796	\$ -	\$ 36,856,796	\$ 981,070	\$ -	\$ 981,070
(b) Statutory Valuation Allowance Adjustment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(c) Adjusted Gross Deferred Tax Assets (1a - 1b)	\$ 37,837,866	\$ -	\$ 37,837,866	\$ 36,856,796	\$ -	\$ 36,856,796	\$ 981,070	\$ -	\$ 981,070
(d) Deferred Tax Assets Nonadmitted	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
(e) Subtotal Net Admitted Deferred Tax Asset (1c - 1d)	\$ 37,837,866	\$ -	\$ 37,837,866	\$ 36,856,796	\$ -	\$ 36,856,796	\$ 981,070	\$ -	\$ 981,070
(f) Deferred Tax Liabilities	\$ 9,912,169	\$ 18,028,396	\$ 27,940,565	\$ 9,802,231	\$ 13,858,895	\$ 23,661,126	\$ 109,938	\$ 4,169,501	\$ 4,279,439
(g) Net Admitted Deferred Tax Asset/(Net Deferred Tax Liability) (1e - 1f)	\$ 27,925,697	\$ (18,028,396)	\$ 9,897,301	\$ 27,054,565	\$ (13,858,895)	\$ 13,195,670	\$ 871,132	\$ (4,169,501)	\$ (3,298,369)

2.

	As of End of Current Period			12/31/2020			Change		
	(1) Ordinary	(2) Capital	(3) (Col. 1 + 2) Total	(4) Ordinary	(5) Capital	(6) (Col. 4 + 5) Total	(7) (Col. 1 - 4) Ordinary	(8) (Col. 2 - 5) Capital	(9) (Col. 7 + 8) Total
Admission Calculation Components SSAP No. 101 (a) Federal Income Taxes Paid In Prior Years Recoverable Through Loss Carrybacks	\$ 27,796,259	\$ -	\$ 27,796,259	\$ 26,273,368	\$ -	\$ 26,273,368	\$ 1,522,891	\$ -	\$ 1,522,891
(b) Adjusted Gross Deferred Tax Assets Expected To Be Realized (Excluding The Amount Of Deferred Tax Assets From 2(a) above) After Application of the Threshold Limitation. (The Lesser of 2(b)1 and 2(b)2 Below)	\$ 2,825,991	\$ -	\$ 2,825,991	\$ 2,829,887	\$ -	\$ 2,829,887	\$ (3,896)	\$ -	\$ (3,896)
1. Adjusted Gross Deferred Tax Assets Expected to be Realized Following the Balance Sheet Date.	\$ 2,825,991	\$ -	\$ 2,825,991	\$ 2,829,887	\$ -	\$ 2,829,887	\$ (3,896)	\$ -	\$ (3,896)
2. Adjusted Gross Deferred Tax Assets Allowed per Limitation Threshold.	XXX	XXX	\$107,815,956	XXX	XXX	\$108,004,321	XXX	XXX	\$ (188,365)
(c) Adjusted Gross Deferred Tax Assets (Excluding The Amount Of Deferred Tax Assets From 2(a) and 2(b) above) Offset by Gross Deferred Tax Liabilities.	\$ 7,215,616	\$ -	\$ 7,215,616	\$ 7,753,541	\$ -	\$ 7,753,541	\$ (537,925)	\$ -	\$ (537,925)
(d) Deferred Tax Assets Admitted as the result of application of SSAP No. 101. Total (2(a) + 2(b) + 2(c))	\$ 37,837,866	\$ -	\$ 37,837,866	\$ 36,856,796	\$ -	\$ 36,856,796	\$ 981,070	\$ -	\$ 981,070

3.

	2021	2020
a. Ratio Percentage Used To Determine Recovery Period And Threshold Limitation Amount.	1359%	1484%
b. Amount Of Adjusted Capital And Surplus Used To Determine Recovery Period And Threshold Limitation In 2(b)2 Above.	\$ 718,773,038	\$ 720,028,804

NOTES TO FINANCIAL STATEMENTS

4.

	As of End of Current Period		12/31/2020		Change	
	(1)	(2)	(3)	(4)	(5)	(6)
	Ordinary	Capital	Ordinary	Capital	(Col. 1 - 3) Ordinary	(Col. 2 - 4) Capital
Impact of Tax Planning Strategies:						
(a) Determination of adjusted gross deferred tax assets and net admitted deferred tax assets, by tax character as a percentage.						
1. Adjusted Gross DTAs amount from Note 9A1(c)	\$ 37,837,866	\$ -	\$ 36,856,796	\$ -	\$ 981,070	\$ -
2. Percentage of adjusted gross DTAs by tax character attributable to the impact of tax planning strategies	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
3. Net Admitted Adjusted Gross DTAs amount from Note 9A1(e)	\$ 37,837,866	\$ -	\$ 36,856,796	\$ -	\$ 981,070	\$ -
4. Percentage of net admitted adjusted gross DTAs by tax character admitted because of the impact of tax planning strategies	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%

b. Do the Company's tax-planning strategies include the use of reinsurance? Yes ☐ No ☒

B. The Company does not have any deferred tax liabilities that are not recognized for amounts described in Accounting Standards Codification 740, Income Tax.

C. Current income taxes incurred consist of the following major components:

	(1) As of End of Current Period	(2) 12/31/2020	(3) (Col. 1 - 2) Change
1. Current Income Tax			
(a) Federal	\$ 17,701,774	\$ 29,488,197	\$ (11,786,423)
(b) Foreign	\$ 4,237	\$ 5,210	\$ (973)
(c) Subtotal	\$ 17,706,011	\$ 29,493,407	\$ (11,787,396)
(d) Federal income tax on net capital gains	\$ 1,265,487	\$ 332,183	\$ 933,304
(e) Utilization of capital loss carry-forwards	\$ -	\$ -	\$ -
(f) Other	\$ -	\$ -	\$ -
(g) Federal and foreign income taxes incurred	\$ 18,971,498	\$ 29,825,590	\$ (10,854,092)
2. Deferred Tax Assets:			
(a) Ordinary:			
(1) Discounting of unpaid losses	\$ 6,258,210	\$ 5,837,160	\$ 421,050
(2) Unearned premium reserve	\$ 20,379,967	\$ 18,925,357	\$ 1,454,610
(3) Policyholder reserves	\$ -	\$ -	\$ -
(4) Investments	\$ -	\$ 1,342,527	\$ (1,342,527)
(5) Deferred acquisition costs	\$ -	\$ -	\$ -
(6) Policyholder dividends accrual	\$ -	\$ -	\$ -
(7) Fixed assets	\$ 9,507,517	\$ 9,205,989	\$ 301,528
(8) Compensation and benefits accrual	\$ 970,288	\$ 905,084	\$ 65,204
(9) Pension accrual	\$ 83,672	\$ -	\$ 83,672
(10) Receivables - nonadmitted	\$ 180,068	\$ 216,173	\$ (36,105)
(11) Net operating loss carry-forward	\$ -	\$ -	\$ -
(12) Tax credit carry-forward	\$ -	\$ -	\$ -
(13) Other (including items <5% of total ordinary tax assets)	\$ 458,144	\$ 424,506	\$ 33,638
(99) Subtotal	\$ 37,837,866	\$ 36,856,796	\$ 981,070
(b) Statutory valuation allowance adjustment	\$ -	\$ -	\$ -
(c) Nonadmitted	\$ -	\$ -	\$ -
(d) Admitted ordinary deferred tax assets (2a99 - 2b - 2c)	\$ 37,837,866	\$ 36,856,796	\$ 981,070
(e) Capital:			
(1) Investments	\$ -	\$ -	\$ -
(2) Net capital loss carry-forward	\$ -	\$ -	\$ -
(3) Real estate	\$ -	\$ -	\$ -
(4) Other (including items <5% of total ordinary tax assets)	\$ -	\$ -	\$ -
(99) Subtotal	\$ -	\$ -	\$ -
(f) Statutory valuation allowance adjustment	\$ -	\$ -	\$ -
(g) Nonadmitted	\$ -	\$ -	\$ -
(h) Admitted capital deferred tax assets (2e99 - 2f - 2g)	\$ -	\$ -	\$ -
(i) Admitted deferred tax assets (2d + 2h)	\$ 37,837,866	\$ 36,856,796	\$ 981,070
3. Deferred Tax Liabilities:			
(a) Ordinary:			
(1) Investments	\$ 372,332	\$ -	\$ 372,332
(2) Fixed assets	\$ 9,058,937	\$ 8,758,037	\$ 300,900
(3) Deferred and uncollected premium	\$ -	\$ -	\$ -
(4) Policyholder reserves	\$ 480,900	\$ 601,230	\$ (120,330)
(5) Other (including items <5% of total ordinary tax liabilities)	\$ -	\$ 442,964	\$ (442,964)
(99) Subtotal	\$ 9,912,169	\$ 9,802,231	\$ 109,938
(b) Capital:			
(1) Investments	\$ 18,028,396	\$ 13,858,895	\$ 4,169,501
(2) Real estate	\$ -	\$ -	\$ -
(3) Other (including items <5% of total capital tax liabilities)	\$ -	\$ -	\$ -
(99) Subtotal	\$ 18,028,396	\$ 13,858,895	\$ 4,169,501
(c) Deferred tax liabilities (3a99 + 3b99)	\$ 27,940,565	\$ 23,661,126	\$ 4,279,439
4. Net deferred tax assets/liabilities (2i - 3c)	\$ 9,897,301	\$ 13,195,670	\$ (3,298,369)

NOTES TO FINANCIAL STATEMENTS

The change in net deferred income taxes is comprised of the following, exclusive of non-admitted assets:

	(1) As of End of Current Period	(2) 12/31/2020	(3) (Col. 1 - 2) Change
Adjusted gross deferred tax assets	\$ 37,837,866	\$ 36,856,796	\$ 981,070
Total deferred tax liabilities	\$ 27,940,565	\$ 23,661,126	\$ 4,279,439
Net deferred tax assets (liabilities)	<u>\$ 9,897,301</u>	<u>\$ 13,195,670</u>	<u>\$ (3,298,369)</u>
Tax effect of the change in unrealized gains (losses)			\$ 4,229,693
Tax effect of the change in pension liability			\$ (354,860)
Change in net deferred income tax			<u>\$ 576,464</u>

D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate

The significant items causing a difference between the statutory federal income tax rate and the Company's effective income tax rate are as follows:

	As of End of Current Period	
	Tax	Rate
Tax provision at statutory rate	\$ 18,998,455	21.0%
Dividend received deductions and tax exempt interest income	\$ (319,133)	-0.4%
Non-deductible expenses	\$ 25,917	0.0%
Non-admitted assets	\$ (252,984)	-0.3%
Return to provision and other	\$ (57,221)	-0.1%
Total	<u>\$ 18,395,034</u>	<u>20.2%</u>

	As of End of Current Period	
	Tax	Rate
Federal income taxes incurred	\$ 17,706,011	19.6%
Realized capital gains tax	\$ 1,265,487	1.4%
Change in net deferred income taxes	\$ (576,464)	-0.8%
Total statutory income taxes	<u>\$ 18,395,034</u>	<u>20.2%</u>

E. Operating Loss and Tax Credit Carryforwards

- At the end of the current reporting period, the Company has no net operating loss carryforwards and no capital loss carryforwards.
- The Company has the following federal income taxes which are available for recoupment in the event of future losses:

For the tax year 2020:	\$ 25,400,207
For the tax year 2021:	\$ 16,609,765

- At the end of the current reporting period, the Company has no deposits under section 6603 of the Internal Revenue Service Code.

F. Consolidated Federal Income Tax Return

- The Company's Federal Income Tax Return is consolidated with the following affiliated companies:

440 Lincoln Street Holding Company LLC	NOVA Casualty Company
AIX, Inc.	Opus Investment Management, Inc.
AIX Insurance Services of California, Inc.	Professionals Direct, Inc.
AIX Specialty Insurance Company	The Hanover American Insurance Company
Allmerica Financial Alliance Insurance Company	The Hanover Atlantic Insurance Company Ltd.
Allmerica Financial Benefit Insurance Company	The Hanover Casualty Company
Allmerica Plus Insurance Agency, Inc.	The Hanover Insurance Company
Campania Holding Company, Inc.	The Hanover Insurance Group, Inc.
Campmed Casualty & Indemnity Company, Inc.	The Hanover National Insurance Company
Citizens Insurance Company of Illinois	The Hanover New Jersey Insurance Company
Citizens Insurance Company of Ohio	VeraVest Investments, Inc.
Citizens Insurance Company of the Midwest	Verlan Fire Insurance Company
Educators Insurance Agency, Inc.	Verlan Holdings, Inc.
Hanover Specialty Insurance Brokers, Inc.	
Massachusetts Bay Insurance Company	

- The Board of Directors has delegated to Company Management, the development and maintenance of appropriate Federal Income Tax allocation policies and procedures, which are subject to written agreement between the companies. The Federal Income tax for all subsidiaries in the consolidated return of The Hanover Insurance Group, Inc. ("THG") is calculated on a separate return basis. Any current tax liability is paid to THG. Tax benefits resulting from taxable operating losses or credits of THG's subsidiaries are reimbursed to the subsidiary when such losses or credits can be utilized on a consolidated return basis.

- G. The Company has no federal or foreign income tax loss contingencies, for which it is reasonably possible that the total liability will significantly increase within 12 months of the reporting date.

H., I.

Not applicable

NOTE 10 Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

A. Nature of Relationships

The Company is a wholly-owned subsidiary of the Hanover Insurance Company ("Hanover") which, in turn, is a wholly-owned subsidiary of Opus Investment Management, Inc. ("Opus"), which, in turn, is a wholly-owned non-insurance subsidiary of THG, a publicly traded company incorporated in Delaware.

NOTES TO FINANCIAL STATEMENTS

B. Detail of Transactions Greater than 1/2% of Admitted Assets

The Company declared a dividend of \$90,000,000 to Hanover on November 2, 2021, which was settled on November 17, 2021 by transferring bonds at fair value of \$87,037,902, accrued interest of \$523,725, and cash in the amount of \$2,438,373. There were net realized gains in the amount of \$4,088,086 as a result of this transaction.

The Company has an intercompany line of credit agreement between itself, THG, and Hanover. Interest is calculated at the 3-month LIBOR rate and principal and interest are due within 90 days of the date of the loan. The following transactions occurred in 2021:

Origination Date	Affiliate	Cash Received/(Paid) Origination	Cash Received/(Paid) Repayment	O/S Balance
February 11, 2021	Hanover	\$ 4,400,000	\$ (4,400,000)	\$ -
March 11, 2021	THG	\$ 1,800,000	\$ (1,800,000)	\$ -
March 12, 2021	Hanover	\$ 1,700,000	\$ (1,700,000)	\$ -
March 19, 2021	Hanover	\$ 2,200,000	\$ (2,200,000)	\$ -
March 22, 2021	THG	\$ 5,500,000	\$ (5,500,000)	\$ -
March 23, 2021	Hanover	\$ 800,000	\$ (800,000)	\$ -
March 24, 2021	Hanover	\$ 2,800,000	\$ (2,800,000)	\$ -
March 30, 2021	Hanover	\$ 14,200,000	\$ (14,200,000)	\$ -
May 28, 2021	Hanover	\$ (11,800,000)	\$ 11,800,000	\$ -
June 7, 2021	Hanover	\$ 500,000	\$ (500,000)	\$ -
June 10, 2021	Hanover	\$ 300,000	\$ (300,000)	\$ -
June 11, 2021	Hanover	\$ 2,600,000	\$ (2,600,000)	\$ -
June 14, 2021	Hanover	\$ 4,400,000	\$ (4,400,000)	\$ -
June 15, 2021	Hanover	\$ 10,700,000	\$ (10,700,000)	\$ -
June 16, 2021	Hanover	\$ 5,400,000	\$ (5,400,000)	\$ -
June 17, 2021	Hanover	\$ 1,300,000	\$ (1,300,000)	\$ -
June 17, 2021	Hanover	\$ 4,000,000	\$ (4,000,000)	\$ -
June 21, 2021	Hanover	\$ 4,000,000	\$ (4,000,000)	\$ -
June 22, 2021	Hanover	\$ 2,200,000	\$ (2,200,000)	\$ -
June 23, 2021	Hanover	\$ 900,000	\$ (900,000)	\$ -
June 24, 2021	Hanover	\$ 3,500,000	\$ (3,500,000)	\$ -
August 13, 2021	Hanover	\$ 500,000	\$ (500,000)	\$ -
August 16, 2021	Hanover	\$ 600,000	\$ (600,000)	\$ -
August 17, 2021	Hanover	\$ 2,000,000	\$ (2,000,000)	\$ -
August 18, 2021	Hanover	\$ 2,100,000	\$ (2,100,000)	\$ -
August 20, 2021	Hanover	\$ 7,600,000	\$ (7,600,000)	\$ -
August 23, 2021	Hanover	\$ 2,600,000	\$ (2,600,000)	\$ -
August 24, 2021	Hanover	\$ 1,500,000	\$ (150,000)	\$ -
August 26, 2021	Hanover	\$ 1,800,000	\$ (180,000)	\$ -

C. Transactions with related party who are not reported on Schedule Y

Not applicable

D. Amounts Due to or from Related Parties

At the end of the reporting period, the Company reported \$0 due to affiliated companies and \$34,199,505 due from affiliated companies. Intercompany servicing arrangements require that intercompany balances be settled within 30 days.

E. Management, Service Contracts, Cost Sharing Arrangements

Companies affiliated with Hanover have entered into an intercompany Consolidated Service Agreement. Under the agreement, legal entities will be charged the cost of the service provided or expenses paid by the entity providing the service or paying the expense. In addition, these entities will be charged a portion of the costs associated with activities that are performed for the good of THG legal entities.

Investment related services are provided by Opus pursuant to an intercompany Advisory Agreement.

F. Guarantees or Contingencies for Related Parties

Not applicable

G. Nature of Relationships that Could Affect Operations

All outstanding shares of the Company are owned by Hanover.

H., I., J., K., L., M., N., O.

Not applicable

NOTE 11 Debt

A. See disclosure below related to Federal Home Loan Bank of Boston (FHLBB) Agreements.

B. FHLB (Federal Home Loan Bank) Agreements

(1) In 2016, the Company acquired FHLBB membership stock to enable short-term advances through its membership in FHLBB.

As collateral to FHLBB, the Company has pledged government agency securities with a fair value of \$21.308.416 as of the end of the reporting period. The fair value of the collateral pledged must be maintained at certain specified levels (equal to 100% ro 112% of loan) of the borrowed amount, which can vary depending on the type of assets pledged. If the fair value of this collateral declines below these specified level, the Company would be required to pledge additional collateral or repay outstanding borrowings. As a requirement of membership in the FHLBB, the Company maintains a certain level of investment in FHLBB stock. Total holdings of FHLBB stock were \$479,200 at the end of the reporting period.

The Company calculates the maximum borrowing capacity amount based on the 4.0% requirement rate on short-term advances, maturing within 90 days.

There are no reserves related to the FHLBB funding agreements at the end of the reporting period.

NOTES TO FINANCIAL STATEMENTS

(2) FHLB Capital Stock

a. Aggregate Totals

	1	2	3
	Total 2+3	General Account	Protected Cell Accounts
1. Current Year			
(a) Membership Stock - Class A	\$ -	\$ -	\$ -
(b) Membership Stock - Class B	\$ 479,200	\$ 479,200	\$ -
(c) Activity Stock	\$ -	\$ -	\$ -
(d) Excess Stock	\$ -	\$ -	\$ -
(e) Aggregate Total (a+b+c+d)	\$ 479,200	\$ 479,200	\$ -
(f) Actual or estimated Borrowing Capacity as Determined by the Insurer	\$ 477,500	XXX	XXX
2. Prior Year-end			
(a) Membership Stock - Class A	\$ -	\$ -	\$ -
(b) Membership Stock - Class B	\$ 479,200	\$ 479,200	\$ -
(c) Activity Stock	\$ -	\$ -	\$ -
(d) Excess Stock	\$ -	\$ -	\$ -
(e) Aggregate Total (a+b+c+d)	\$ 479,200	\$ 479,200	\$ -
(f) Actual or estimated Borrowing Capacity as Determined by the Insurer	\$ 1,090,850	XXX	XXX

11B(2)a1(f) should be equal to or greater than 11B(4)a1(d)
11B(2)a2(f) should be equal to or greater than 11B(4)a2(d)

b. Membership Stock (Class A and B) Eligible and Not Eligible for Redemption

	Eligible for Redemption					
	1	2	3	4	5	6
	Current Year Total (2+3+4+5+6)	Not Eligible for Redemption	Less Than 6 Months	6 Months to Less Than 1 Year	1 to Less Than 3 Years	3 to 5 Years
Membership Stock						
1. Class A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2. Class B	\$ 479,200	\$ 479,200	\$ -	\$ -	\$ -	\$ -

11B(2)b1 Current Year Total (Column 1) should equal 11B(2)a1(a) Total (Column 1)
11B(2)b2 Current Year Total (Column 1) should equal 11B(2)a1(b) Total (Column 1)

(3) Collateral Pledged to FHLB

a. Amount Pledged as of Reporting Date

	1	2	3
	Fair Value	Carrying Value	Aggregate Total Borrowing
1. Current Year Total General and Protected Cell Account Total Collateral Pledged (Lines 2+3)	\$ 21,308,416	\$ 20,683,958	\$ -
2. Current Year General Account Total Collateral Pledged	\$ 21,308,416	\$ 20,683,958	\$ -
3. Current Year Protected Cell Account Total Collateral Pledged	\$ -	\$ -	\$ -
4. Prior Year-end Total General and Protected Cell Account Total Collateral Pledged	\$ 19,047,877	\$ 18,157,684	\$ -

11B(3)a1 (Columns 1, 2 and 3) should be equal to or less than 11B(3)b1 (Columns 1, 2 and 3 respectively)
11B(3)a2 (Columns 1, 2 and 3) should be equal to or less than 11B(3)b2 (Columns 1, 2 and 3 respectively)
11B(3)a3 (Columns 1, 2 and 3) should be equal to or less than 11B(3)b3 (Columns 1, 2 and 3 respectively)
11B(3)a4 (Columns 1, 2 and 3) should be equal to or less than 11B(3)b4 (Columns 1, 2 and 3 respectively)

b. Maximum Amount Pledged During Reporting Period

	1	2	3
	Fair Value	Carrying Value	Amount Borrowed at Time of Maximum Collateral
1. Current Year Total General and Protected Cell Account Maximum Collateral Pledged (Lines 2+3)	\$ 29,512,955	\$ 28,377,525	\$ -
2. Current Year General Account Maximum Collateral Pledged	\$ 29,512,955	\$ 28,377,525	\$ -
3. Current Year Protected Cell Account Maximum Collateral Pledged	\$ -	\$ -	\$ -
4. Prior Year-end Total General and Protected Cell Account Maximum Collateral Pledged	\$ 28,950,384	\$ 28,165,639	\$ 10,000,000

NOTES TO FINANCIAL STATEMENTS

(4) Borrowing from FHLB

a. Amount as of Reporting Date

	1	2	3	4
		General	Protected Cell	Funding
	Total 2+3	Account	Account	Agreements
				Reserves
				Established
1. Current Year				
(a) Debt	\$ -	\$ -	\$ -	XXX
(b) Funding Agreements	\$ -	\$ -	\$ -	\$ -
(c) Other	\$ -	\$ -	\$ -	XXX
(d) Aggregate Total (a+b+c)	\$ -	\$ -	\$ -	\$ -
2. Prior Year end				
(a) Debt	\$ -	\$ -	\$ -	XXX
(b) Funding Agreements	\$ -	\$ -	\$ -	\$ -
(c) Other	\$ -	\$ -	\$ -	XXX
(d) Aggregate Total (a+b+c)	\$ -	\$ -	\$ -	\$ -

b. Maximum Amount During Reporting Period (Current Year)

	1	2	3
	Total 2+3	General	Protected Cell
		Account	Account
1. Debt	\$ -	\$ -	\$ -
2. Funding Agreements	\$ -	\$ -	\$ -
3. Other	\$ -	\$ -	\$ -
4. Aggregate Total (1+2+3)	\$ -	\$ -	\$ -

11B(4)b4 (Columns 1, 2 and 3) should be equal to or greater than 11B(4)a1(d) (Columns 1, 2 and 3 respectively)

c. FHLB - Prepayment Obligations

	Does the company have prepayment obligations under the following arrangements (YES/NO)?
1. Debt	No
2. Funding Agreements	No
3. Other	No

NOTE 12 Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans

The labor for the Company is provided and paid for by Hanover. As such, the Company is included in the benefit plans in force for Hanover. The Company is charged for actual salary and benefit costs for services provided to the Company by Hanover employees.

A., B., C., D., E., F.

Not applicable

G. Consolidated/Holding Company Plans

The Company has legal obligation for benefits under these plans. Employees of subsidiary companies participate in the plans sponsored by Hanover.

During 2021, the Company recorded an increase to surplus in the amount of \$2,354,303 related to its allocation of the minimum pension liability. This is reflected as an adjustment to surplus, net of tax, in accordance with SSAP No. 102, "Accounting for Pensions, A Replacement of SSAP No. 89." The decrease in the additional minimum pension liability is primarily a result of a decrease in the discount rate and higher returns on plan assets.

In addition to pension benefits, the Company participates in other benefit plans sponsored by Hanover for Hanover retired employees and other dependents. The expenses of these plans are charged to affiliates in accordance with a cost allocation policy. In 2021, the Company's share of these expenses was approximately \$317,044.

H., I.

Not applicable

NOTE 13 Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

A. Outstanding Shares

The Company has 2,000,000 shares of \$2 par value common stock authorized, and 1,700,000 shares issued and outstanding. The Company has 1,000,000 shares of \$1.25 par value preferred stock authorized and 0 shares issued and outstanding.

B. Dividend Rate of Preferred Stock

Not applicable

C-F. Dividend Restrictions

Pursuant to Michigan's statute, the maximum dividend and other distributions that an insurer may pay in any twelve month period, without prior approval of the Michigan Insurance Commissioner, is limited to the greater of 10% of such insurer's statutory policyholder surplus as of December 31, of the immediately preceding year or the statutory net income less realized gains, for the immediately preceding calendar year. The Company declared dividend to Hanover totaling \$90,000,000 on November 2, 2021. The Company cannot declare a further dividend to it's parent without prior approval until November 2, 2022 , at which time the maximum dividend payable without prior approval is \$72,867,034.

NOTES TO FINANCIAL STATEMENTS

Not applicable

This unrealized gain is not net of the applicable deferred tax liability of \$17,965,253.

Not applicable

A. Contingent Commitments

Total contingent liabilities:	\$ 51,761,183
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Not applicable

Not applicable

The Company routinely engages in various legal proceedings in the normal course of business, including claims for punitive damages. In the opinion of management, none of such contingencies are expected to have a material effect on the Company's financial position, although it is possible that the results of operations in a particular quarter or annual period would be materially affected by an adverse development or unfavorable outcome.

A. Lessee Operating Leases

<u>Years ending December 31,</u>	<u>Total commitments</u>
2022	\$ 774,829
2023	\$ 547,810
2024	\$ 139,115
2025	\$ 49,206
2026	\$ 37,224
Total	\$ 1,548,184

Not applicable

Not applicable

Not applicable

1-7. Not applicable

The Company generally does not sell and reacquire securities within 30 days of the sale date. There were no wash sale transactions with a NAIC designation of 3 or below in the current year.

Not applicable

Not applicable

NOTES TO FINANCIAL STATEMENTS

NOTE 20 Fair Value Measurements

A.

(1) Fair Value Measurements at Reporting Date

Description for each class of asset or liability	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Total
a. Assets at fair value					
Bonds: Industrial and Miscellaneous	\$ -	\$ 11,245,944	\$ -	\$ -	\$ 11,245,944
Bank Loans	\$ -	\$ 10,271,976	\$ -	\$ -	\$ 10,271,976
Common stocks: industrial and miscellaneous (a)	\$ 167,547,872	\$ -	\$ -	\$ -	\$ 167,547,872
Total assets at fair value/NAV	\$ 167,547,872	\$ 21,517,920	\$ -	\$ -	\$ 189,065,792

(a) Excludes equities carried at cost of \$479,200 at the end of the reporting period which consists of FHLB common stock.

b. The Company does not have any liabilities measured at fair value at the end of the current reporting period.

(2) Fair Value Measurements in (Level 3) of the Fair Value hierarchy

a. Not applicable

b. Not applicable

(3) The reporting entity's policy is to recognize transfers in and transfers out as of the actual date of the event or change in circumstances that caused the transfer.

(4) For fair value measurements categorized within Level 2 of the fair value hierarchy, fair values of bonds are obtained by a quoted market price if available, otherwise, fair values are estimated using independent pricing sources or internally developed pricing models using discounted cash flow analyses.

The Company utilizes a third party pricing service for the valuation of the majority of its fixed maturity securities and receives one quote per security. When quoted market prices in an active market are available, they are provided by the pricing service as the fair value and such values are classified as Level 1. Since fixed maturities other than U.S. Treasury securities generally do not trade on a daily basis, the pricing service prepares estimates of fair value for those securities using pricing applications based on a market approach. Inputs into the fair value pricing applications which are common to all asset classes include benchmark U.S. Treasury security yield curves, reported trades of identical or similar fixed maturity securities, broker/dealer quotes of identical or similar fixed maturity securities and structural characteristics of the security, such as maturity date, coupon, mandatory principal payment dates, frequency of interest and principal payments and optional principal redemption features. Inputs into the fair value applications that are unique by asset class include, but are not limited to:

- U.S. government – determination of direct versus indirect government support and whether any contingencies exist with respect to the timely payment of principal and interest.
- All other governments – estimates of appropriate market spread versus underlying related sovereign treasury curves dependent on liquidity and direct or contingent support.
- Corporate bonds, which are included in Industrial and miscellaneous bonds - overall credit quality, including assessments of the level and variability of: economic sensitivity; liquidity; corporate financial policies; management quality; regulatory environment; competitive position; ownership; restrictive covenants; and security or collateral.
- Municipal bonds, which are included in States, territories and possessions; Political subdivisions of states, territories and possessions; and Special revenue and special assessment obligations - overall credit quality, including assessments of the level and variability of: sources of payment such as income, sales or property taxes, levies or user fees; credit support such as insurance; state or local economic and political base; natural resource availability; and susceptibility to natural or man-made catastrophic events such as hurricanes, earthquakes or acts of terrorism.
- Residential mortgage-backed securities, U.S. agency pass-thrus and collateralized mortgage obligations (“CMOs”) which are included in U.S. governments and Special revenue and special assessment obligations - estimates of prepayment speeds based upon: historical prepayment rate trends; underlying collateral interest rates; geographic concentration; vintage year; borrower credit quality characteristics; interest rate and yield curve forecasts; government or monetary authority support programs; tax policies; and delinquency/default trends.
- Residential mortgage-backed securities, non-agency CMOs, which are included in Industrial and miscellaneous bonds - estimates of prepayment speeds based upon: historical prepayment rate trends; underlying collateral interest rates; geographic concentration; vintage year; borrower credit quality characteristics; interest rate and yield curve forecasts; government or monetary authority support programs; tax policies; delinquency/default trends; and severity of loss upon default and length of time to recover proceeds following default.
- Commercial mortgage-backed securities, which are included in Industrial and miscellaneous bonds - overall credit quality, including assessments of the value and supply/demand characteristics of: collateral type such as office, retail, residential, lodging, or other; geographic concentration by region, state, metropolitan statistical area and locale; vintage year; historical collateral performance including defeasance, delinquency, default and special servicer trends; and capital structure support features.
- Asset-backed securities, which are included in Industrial and miscellaneous bonds – overall credit quality, including assessments of the underlying collateral type such as credit card receivables, auto loan receivables and equipment lease receivables; geographic diversification; vintage year; historical collateral performance including delinquency, default and casualty trends; economic conditions influencing use rates and resale values; and contract structural support features.

Generally, all prices provided by the pricing service, except actively traded securities with quoted market prices, are reported as Level 2.

The Company holds privately placed corporate bonds and certain other bonds that do not have an active market and for which the pricing service cannot provide fair values. The Company determines fair values for these securities using either matrix pricing or broker quotes. The Company will use observable market data to the extent it is available, but is also required to use a certain amount of unobservable judgment due to the illiquid nature of the securities involved. Additionally, the Company may obtain nonbinding broker quotes which are reported as Level 3.

Fair values of common and preferred stocks are based on SVO valuation, if available. If SVO valuations are not available, quoted market prices are used. If neither SVO prices nor quoted market prices are available, fair values are estimated using independent pricing sources or internally developed pricing models using discounted cash flow analyses.

Level 2 includes securities that are valued using pricing for similar securities and pricing models that incorporate observable inputs. Level 3 consists of common stock of private companies for which observable inputs are not available. The Company uses a third party pricing service for the valuation of the majority of its equity securities. When quoted market prices in an active market are available, they are provided by the pricing service as the fair value and such values are classified as Level 1. Generally, all prices provided by the pricing service except quoted market prices, are reported as Level 2. Occasionally, the Company may obtain nonbinding broker quotes which are reported as Level 3.

(5) Not applicable

B. Not applicable

NOTES TO FINANCIAL STATEMENTS

C. Aggregate fair value for all financial instruments and the level within the fair value hierarchy in which the fair value measurements in their entirety fall.

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 1,161,243,706	\$ 1,128,784,182	\$ 16,467,508	\$ 1,141,242,354	\$ 3,533,844	\$ -	\$ -
Common Stock	\$ 168,027,072	\$ 168,027,072	\$ 167,547,872	\$ 479,200	\$ -	\$ -	\$ -
Cash and Short-Term Investments	\$ 36,209,817	\$ 36,209,817	\$ 36,209,817	\$ -	\$ -	\$ -	\$ -

D., E.

Not applicable

NOTE 21 Other Items

A. Unusual or Infrequent Items

On November 3, 2021, the Michigan Catastrophic Claims Association ("MCCA") Board voted unanimously to return approximately \$3.0 billion of its estimated surplus to policyholders through its member insurance companies. The action occurred because the association's surplus was deemed to have increased beyond a level necessary to cover its expected losses and expenses. Because policyholders are the ultimate payers of the MCCA premium, this return of MCCA surplus will be passed through to policyholders. The refund is expected to be paid to the Company during March 2022 and will be refunded to the policyholders shortly thereafter. The refund due policyholders was recorded as an aggregate write-in liability and the refund receivable was recorded as an aggregate write-in asset in the Company's financial statements. There is no effect on surplus or the income statement

B. Troubled Debt Restructuring: Debtors

Not applicable

C. Other Disclosures

IBNR loss and loss adjustment expense reserves are allocated to the Company based on the proportion of the Company's earned premiums and case loss reserves relative to other affiliates in The Hanover Insurance Group. Fluctuations by affiliate and state may occur as a result of this re-estimation process.

The Company elected to use rounding to the nearest dollar in reporting amounts in the Statement, except as otherwise directed by instructions.

D. Business Interruption Insurance Recoveries

Not applicable

E. State Transferable and Non-transferable Tax Credits

Not applicable

F. Subprime Mortgage Related Risk Exposure

The Company has reviewed its investments in mortgage-backed securities and has determined that these investments are not subprime.

G. Insurance-Linked Securities (ILS) Contracts

Not applicable

H. The Amount That Could Be Realized on Life Insurance Where the Reporting Entity is Owner and Beneficiary or Has Otherwise Obtained Rights to Control the Policy

Not applicable

NOTE 22 Events Subsequent

Not applicable

NOTE 23 Reinsurance

A. Unsecured Reinsurance Recoverables

Individual Reinsurers with Unsecured Reinsurance Recoverables Exceeding 3% of Policyholder Surplus

Individual Reinsurers Who Are Not Members of a Group

FEIN	Reinsurer Name	Unsecured Amount
AA-9991159	MICHIGAN CATASTROPHIC CLAIMS	\$ 899,974,000

Individual Reinsurers Who Are Members of a Group

Group Code	FEIN	Reinsurer Name	Unsecured Amount
88	13-5129825	THE HANOVER INSURANCE COMPANY	\$ 986,719,000

B. Reinsurance Recoverable in Dispute

The Company had no reinsurance recoverable on paid and unpaid losses in dispute which exceeds 5% of the Company's policyholder surplus. The aggregate of the Company's disputed items did not exceed 10% of policyholder surplus.

NOTES TO FINANCIAL STATEMENTS

C. Reinsurance Assumed and Ceded

(1) The following table summarizes ceded and assumed unearned premiums and the related commission equity at the end of the current reporting period:

	Assumed Reinsurance		Ceded Reinsurance		Net	
	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity	Premium Reserve	Commission Equity
a. Affiliates	\$ 397,462,986	\$ -	\$ 278,327,283	\$ -	\$ 119,135,703	\$ -
b. All Other	\$ 450,651	\$ 82,636	\$ 16,480,397	\$ 558,912	\$ (16,029,746)	\$ (476,276)
c. Total	\$ 397,913,637	\$ 82,636	\$ 294,807,680	\$ 558,912	\$ 103,105,957	\$ (476,276)
d. Direct Unearned Premium Reserve						\$ 374,776,535

(2) The additional or return commission, predicated on loss experience or any other form of profit sharing arrangements in this annual statement as a result of existing contractual arrangements are accrued as follows:

	Direct	Assumed	Ceded	Net
a. Contingent Commission	\$ 29,899,845	\$ -	\$ -	\$ 29,899,845
b. Sliding Scale Adjustments	\$ -	\$ -	\$ -	\$ -
c. Other Profit Commission Arrangements	\$ -	\$ -	\$ -	\$ -
d. TOTAL	\$ 29,899,845	\$ -	\$ -	\$ 29,899,845

(3) Not applicable

D.,E.,F.,G.,H.,I.,J.,K.

Not applicable

NOTE 24 Retrospectively Rated Contracts & Contracts Subject to Redetermination

Not applicable

NOTE 25 Change in Incurred Losses and Loss Adjustment Expenses

- A. The estimated cost of loss and loss adjustment expenses ("LAE") attributable to insured events of prior year's decreased by \$28,271,106 during 2021. The redundancy of \$28,271,106 is 5.3% of unpaid losses and LAE of \$498,986,182 as of December 31, 2020. The favorable loss and LAE reserve development during 2021 is primarily due to lower than expected personal auto losses in accident year 2020 due to fewer accidents and decreased claim activity resulting from fewer miles driven as a result of the Pandemic. Increases or decreases of this nature occur as a result of claim settlements during the current year, and as additional information is received regarding individual claims, causing changes from the original estimates of the cost of these claims. Recent loss development trends are also taken into account evaluating the overall adequacy of unpaid losses and LAE.
- B. There were no significant changes in methodologies and assumptions used in calculating the liability for unpaid property and casualty losses and loss adjustment expenses.

NOTE 26 Intercompany Pooling Arrangements

Not applicable

NOTE 27 Structured Settlements

A. Reserves Released due to Purchase of Annuities

The company has purchased annuities from life insurers under which the claimants are payees as follows:

Loss Reserves Eliminated by Annuities	Unrecorded Loss Contingencies
\$ 7,408,901	\$ 7,408,901

B. Annuity Insurers with Balances due Greater than 1% of Policyholders' Surplus

Not applicable

NOTE 28 Health Care Receivables

Not applicable

NOTE 29 Participating Policies

Not applicable

NOTE 30 Premium Deficiency Reserves

1. Liability carried for premium deficiency reserves \$ -
2. Date of the most recent evaluation of this liability 12/31/2021
3. Was anticipated investment income utilized in the calculation? Yes [X] No []

NOTE 31 High Deductibles

Not applicable

NOTES TO FINANCIAL STATEMENTS

NOTE 32 Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

A. Tabular Discount

Total liabilities for unpaid property and casualty losses and loss adjustment expenses are not discounted. However, case unpaid losses for pension-type workers' compensation reserves are discounted on a tabular basis using the National Council on Compensation Insurance ("NCCI") published tables at a rate of 3.5%. This discount is completely offset in the Company's IBNR reserves.

B. Nontabular Discount

Not applicable

C. Charges in Discount Assumptions

Not applicable

NOTE 33 Asbestos/Environmental Reserves

A. Does the Company have on the books, or has it ever written an insured for which you have identified a potential for existence of, a liability due to asbestos losses?

Yes [X] No []

The Company's exposure to asbestos claims arises from the sale of commercial multiple peril and general liability policies.

The Company tries to estimate the full impact of the asbestos exposure by establishing full case basis reserves on all known losses and computing IBNR losses based on previous experience.

The Company's asbestos-related losses (including coverage dispute costs) for each of the five most recent calendar years were as follows:

Asbestos

(1) Direct

	2017	2018	2019	2020	2021
a. Beginning reserves:	\$ 1,977,000	\$ 1,867,000	\$ 1,856,000	\$ 1,833,000	\$ 1,647,000
b. Incurred losses and loss adjustment expense:	\$ (105,000)	\$ 1,000	\$ -	\$ (180,000)	\$ (51,000)
c. Calendar year payments for losses and loss adjustment expenses:	\$ 5,000	\$ 12,000	\$ 23,000	\$ 6,000	\$ 4,000
d. Ending reserves:	\$ 1,867,000	\$ 1,856,000	\$ 1,833,000	\$ 1,647,000	\$ 1,592,000

(2) Assumed Reinsurance

	2017	2018	2019	2020	2021
a. Beginning reserves:	\$ -	\$ -	\$ -	\$ -	\$ -
b. Incurred losses and loss adjustment expense:	\$ -	\$ -	\$ -	\$ -	\$ -
c. Calendar year payments for losses and loss adjustment expenses:	\$ -	\$ -	\$ -	\$ -	\$ -
d. Ending reserves:	\$ -	\$ -	\$ -	\$ -	\$ -

(3) Net of Ceded Reinsurance

	2017	2018	2019	2020	2021
a. Beginning reserves:	\$ 451,000	\$ 316,000	\$ 305,000	\$ 221,000	\$ 207,000
b. Incurred losses and loss adjustment expense:	\$ (130,000)	\$ -	\$ 1,000	\$ (8,000)	\$ (40,000)
c. Calendar year payments for losses and loss adjustment expenses:	\$ 5,000	\$ 11,000	\$ 85,000	\$ 6,000	\$ 4,000
d. Ending reserves:	\$ 316,000	\$ 305,000	\$ 221,000	\$ 207,000	\$ 163,000

B. Ending Reserves for Asbestos Claims for Bulk and IBNR Losses and LAE Included in A above:

(1) Direct Basis:	\$ 1,563,000
(2) Assumed Reinsurance Basis:	\$ -
(3) Net of Ceded Reinsurance Basis:	\$ 157,000

C. Ending Reserves for Asbestos Claims for Loss Adjustment Expenses Included in A above (Case, Bulk and IBNR):

(1) Direct Basis:	\$ 769,000
(2) Assumed Reinsurance Basis:	\$ -
(3) Net of Ceded Reinsurance Basis:	\$ 108,000

D. Does the Company have on the books, or has it ever written an insured for which you have identified a potential for existence of, a liability due to environmental losses?

Yes [X] No []

The Company's exposure to environmental claims arises from the sale of commercial multiple peril and general liability policies.

The Company tries to estimate the full impact of the environmental exposure by establishing full case basis reserves on all known losses and computing IBNR losses based on previous experience.

NOTES TO FINANCIAL STATEMENTS

The Company’s environmental-related losses (including coverage dispute costs) for each of the five most recent calendar years were as follows:

Environmental

(1) Direct					
	2017	2018	2019	2020	2021
a. Beginning reserves:	\$ 183,000	\$ 173,000	\$ 172,000	\$ 170,000	\$ 152,000
b. Incurred losses and loss adjustment expense:	\$ (9,000)	\$ -	\$ -	\$ (17,000)	\$ (5,000)
c. Calendar year payments for losses and loss adjustment expenses:	\$ 1,000	\$ 1,000	\$ 2,000	\$ 1,000	\$ -
d. Ending reserves:	<u>\$ 173,000</u>	<u>\$ 172,000</u>	<u>\$ 170,000</u>	<u>\$ 152,000</u>	<u>\$ 147,000</u>
(2) Assumed Reinsurance					
	2017	2018	2019	2020	2021
a. Beginning reserves:	\$ -	\$ -	\$ -	\$ -	\$ -
b. Incurred losses and loss adjustment expense:	\$ -	\$ -	\$ -	\$ -	\$ -
c. Calendar year payments for losses and loss adjustment expenses:	\$ -	\$ -	\$ -	\$ -	\$ -
d. Ending reserves:	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
(3) Net of Ceded Reinsurance					
	2017	2018	2019	2020	2021
a. Beginning reserves:	\$ 49,000	\$ 34,000	\$ 32,000	\$ 23,000	\$ 22,000
b. Incurred losses and loss adjustment expense:	\$ (14,000)	\$ (1,000)	\$ -	\$ -	\$ (5,000)
c. Calendar year payments for losses and loss adjustment expenses:	\$ 1,000	\$ 1,000	\$ 9,000	\$ 1,000	\$ -
d. Ending reserves:	<u>\$ 34,000</u>	<u>\$ 32,000</u>	<u>\$ 23,000</u>	<u>\$ 22,000</u>	<u>\$ 17,000</u>

E.	Ending Reserves for Environmental Claims for Bulk and IBNR Losses and LAE Included in D above:		
	(1) Direct Basis:	\$	145,000
	(2) Assumed Reinsurance Basis:	\$	-
	(3) Net of Ceded Reinsurance Basis:	\$	17,000
F.	Ending Reserves for Environmental Claims for Loss Adjustment Expenses Included in D above (Case, Bulk and IBNR):		
	(1) Direct Basis:	\$	71,000
	(2) Assumed Reinsurance Basis:	\$	-
	(3) Net of Ceded Reinsurance Basis:	\$	11,000

NOTE 34 Subscriber Savings Accounts

Not applicable

NOTE 35 Multiple Peril Crop Insurance

Not applicable

NOTE 36 Financial Guaranty Insurance

Not applicable

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES
GENERAL

1.1

Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer?
If yes, complete Schedule Y, Parts 1, 1A, 2 and 3.

Yes ☒ No ☐

1.2

If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent, or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations?

Yes ☒ No ☐ N/A ☐

1.3

State Regulating?

Michigan

1.4

Is the reporting entity publicly traded or a member of a publicly traded group?

Yes ☐ No ☐

1.5

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

0000944695

2.1

Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity?

Yes ☐ No ☒

2.2

If yes, date of change:

3.1

State as of what date the latest financial examination of the reporting entity was made or is being made.

12/31/2019

3.2

State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released.

12/31/2019

3.3

State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date).

04/02/2021

3.4

By what department or departments?
Michigan Department of Insurance and Financial Services

3.5

Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments?

Yes ☐ No ☐ N/A ☒

3.6

Have all of the recommendations within the latest financial examination report been complied with?

Yes ☐ No ☐ N/A ☒

4.1

During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity), receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
4.11 sales of new business?
4.12 renewals?

Yes ☐ No ☒
Yes ☐ No ☒

4.2

During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:
4.21 sales of new business?
4.22 renewals?

Yes ☐ No ☒
Yes ☐ No ☒

5.1

Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?
If yes, complete and file the merger history data file with the NAIC.

Yes ☐ No ☒

5.2

If yes, provide the name of the entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

1 Name of Entity	2 NAIC Company Code	3 State of Domicile

6.1

Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period?

Yes ☐ No ☒

6.2

If yes, give full information:

7.1

Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity?

Yes ☐ No ☒

7.2

If yes,
7.21 State the percentage of foreign control;
7.22 State the nationality(s) of the foreign person(s) or entity(s) or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact; and identify the type of entity(s) (e.g., individual, corporation or government, manager or attorney in fact).

0.0 %

1 Nationality	2 Type of Entity

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

- 8.1

Is the company a subsidiary of a depository institution holding company (DIHC) or a DIHC itself, regulated by the Federal Reserve Board?

Yes [] No [X]
- 8.2

If the response to 8.1 is yes, please identify the name of the DIHC.
- 8.3

Is the company affiliated with one or more banks, thrifts or securities firms?

Yes [X] No []
- 8.4

If response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

1	2	3	4	5	6
Affiliate Name	Location (City, State)	FRB	OCC	FDIC	SEC
Opus Investment Management	Worcester, MA				YES

- 8.5

Is the reporting entity a depository institution holding company with significant insurance operations as defined by the Board of Governors of Federal Reserve System or a subsidiary of the reporting entity?

Yes [] No [X]
- 8.6

If response to 8.5 is no, is the reporting entity a company or subsidiary of a company that has otherwise been made subject to the Federal Reserve Board's capital rule?

Yes [] No [X] N/A []
9.

What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?
PricewaterhouseCoopers, LLP, 101 Seaport Boulevard, Suite 500, Boston, MA 02210
- 10.1

Has the insurer been granted any exemptions to the prohibited non-audit services provided by the certified independent public accountant requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation?

Yes [] No [X]
- 10.2

If the response to 10.1 is yes, provide information related to this exemption:
- 10.3

Has the insurer been granted any exemptions related to the other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 18A of the Model Regulation, or substantially similar state law or regulation?

Yes [] No [X]
- 10.4

If the response to 10.3 is yes, provide information related to this exemption:
- 10.5

Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws?

Yes [X] No [] N/A []
- 10.6

If the response to 10.5 is no or n/a, please explain
11.

What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?
Jonathan Blake, Vice President and Lead Reserving Actuary, FCAS, MAAA, 440 Lincoln Street, Worcester, MA 01653
- 12.1

Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly?

Yes [] No [X]
- 12.11

Name of real estate holding company
- 12.12

Number of parcels involved

0
- 12.13

Total book/adjusted carrying value

\$0
- 12.2

If, yes provide explanation:
13.

FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:
- 13.1

What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?
- 13.2

Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located?

Yes [] No []
- 13.3

Have there been any changes made to any of the trust indentures during the year?

Yes [] No []
- 13.4

If answer to (13.3) is yes, has the domiciliary or entry state approved the changes?

Yes [] No [] N/A []
- 14.1

Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?

Yes [X] No []
- a.

Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- b.

Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
- c.

Compliance with applicable governmental laws, rules and regulations;
- d.

The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
- e.

Accountability for adherence to the code.
- 14.11

If the response to 14.1 is No, please explain:
- 14.2

Has the code of ethics for senior managers been amended?

Yes [] No [X]
- 14.21

If the response to 14.2 is yes, provide information related to amendment(s).
- 14.3

Have any provisions of the code of ethics been waived for any of the specified officers?

Yes [] No [X]
- 14.31

If the response to 14.3 is yes, provide the nature of any waiver(s).

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

- 15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance where the issuing or confirming bank is not on the SVO Bank List?
- 15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.
- Yes [] No [X]

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount
			0

BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the board of directors or a subordinate committee thereof?
17. Does the reporting entity keep a complete permanent record of the proceedings of its board of directors and all subordinate committees thereof?
18. Has the reporting entity an established procedure for disclosure to its board of directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict with the official duties of such person?
- Yes [X] No []
- Yes [X] No []
- Yes [X] No []

FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)?
- 20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):

20.11 To directors or other officers

20.12 To stockholders not officers

20.13 Trustees, supreme or grand (Fraternal Only)
- 20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):

20.21 To directors or other officers

20.22 To stockholders not officers

20.23 Trustees, supreme or grand (Fraternal Only)
- 21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reported in the statement?
- 21.2 If yes, state the amount thereof at December 31 of the current year:

21.21 Rented from others

21.22 Borrowed from others

21.23 Leased from others

21.24 Other
- 22.1 Does this statement include payments for assessments as described in the Annual Statement Instructions other than guaranty fund or guaranty association assessments?
- 22.2 If answer is yes:

22.21 Amount paid as losses or risk adjustment

22.22 Amount paid as expenses

22.23 Other amounts paid
- 23.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement?
- 23.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount:
- 24.1 Does the insurer utilize third parties to pay agent commissions in which the amounts advanced by the third parties are not settled in full within 90 days?
- 24.2 If the response to 24.1 is yes, identify the third-party that pays the agents and whether they are a related party.
- Yes [] No [X]
- Yes [X] No []
- \$ 34,199,505
- Yes [] No [X]

Name of Third-Party	Is the Third-Party Agent a Related Party (Yes/No)

INVESTMENT

- 25.01 Were all the stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date? (other than securities lending programs addressed in 25.03)
- Yes [X] No []

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

25.02 If no, give full and complete information relating thereto

25.03 For securities lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet. (an alternative is to reference Note 17 where this information is also provided)

25.04 For the reporting entity's securities lending program, report amount of collateral for conforming programs as outlined in the Risk-Based Capital Instructions. \$ 0

25.05 For the reporting entity's securities lending program, report amount of collateral for other programs. \$ 0

25.06 Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract? Yes [] No [] N/A [X]

25.07 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? Yes [] No [] N/A [X]

25.08 Does the reporting entity or the reporting entity 's securities lending agent utilize the Master Securities lending Agreement (MSLA) to conduct securities lending? Yes [] No [] N/A [X]

25.09 For the reporting entity's securities lending program state the amount of the following as of December 31 of the current year:

25.091 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2. \$ 0

25.092 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2. \$ 0

25.093 Total payable for securities lending reported on the liability page. \$ 0

26.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity, or has the reporting entity sold or transferred any assets subject to a put option contract that is currently in force? (Exclude securities subject to Interrogatory 21.1 and 25.03). Yes [X] No []

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

26.21 Subject to repurchase agreements \$ 0

26.22 Subject to reverse repurchase agreements \$ 0

26.23 Subject to dollar repurchase agreements \$ 0

26.24 Subject to reverse dollar repurchase agreements \$ 0

26.25 Placed under option agreements \$ 0

26.26 Letter stock or securities restricted as to sale - excluding FHLB Capital Stock \$ 0

26.27 FHLB Capital Stock \$ 479,200

26.28 On deposit with states \$ 4,995,333

26.29 On deposit with other regulatory bodies \$ 0

26.30 Pledged as collateral - excluding collateral pledged to an FHLB \$ 0

26.31 Pledged as collateral to FHLB - including assets backing funding agreements \$ 20,683,958

26.32 Other \$ 0

26.3 For category (26.26) provide the following:

1 Nature of Restriction	2 Description	3 Amount
		0

27.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes [] No [X]

27.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No [] N/A [X]
If no, attach a description with this statement.

LINES 27.3 through 27.5: FOR LIFE/FRATERNAL REPORTING ENTITIES ONLY:

27.3 Does the reporting entity utilize derivatives to hedge variable annuity guarantees subject to fluctuations as a result of interest rate sensitivity? .. Yes [] No []

27.4 If the response to 27.3 is YES, does the reporting entity utilize:

27.41 Special accounting provision of SSAP No. 108 Yes [] No []

27.42 Permitted accounting practice Yes [] No []

27.43 Other accounting guidance Yes [] No []

27.5 By responding YES to 27.41 regarding utilizing the special accounting provisions of SSAP No. 108, the reporting entity attests to the following: Yes [] No []

- The reporting entity has obtained explicit approval from the domiciliary state.
- Hedging strategy subject to the special accounting provisions is consistent with the requirements of VM-21.
- Actuarial certification has been obtained which indicates that the hedging strategy is incorporated within the establishment of VM-21 reserves and provides the impact of the hedging strategy within the Actuarial Guideline Conditional Tail Expectation Amount.
- Financial Officer Certification has been obtained which indicates that the hedging strategy meets the definition of a Clearly Defined Hedging Strategy within VM-21 and that the Clearly Defined Hedging Strategy is the hedging strategy being used by the company in its actual day-to-day risk mitigation efforts.

28.1 Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into equity, or, at the option of the issuer, convertible into equity? Yes [] No [X]

28.2 If yes, state the amount thereof at December 31 of the current year. \$ 0

29. Excluding items in Schedule E - Part 3 - Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook?..... Yes [X] No []

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

1 Name of Custodian(s)	2 Custodian's Address
Bank of New York Mellon	225 Liberty Street, New York, NY 10286

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

29.02 For all agreements that do not comply with the requirements of the NAIC Financial Condition Examiners Handbook, provide the name, location and a complete explanation:

1 Name(s)	2 Location(s)	3 Complete Explanation(s)
.....

29.03 Have there been any changes, including name changes, in the custodian(s) identified in 29.01 during the current year?..... Yes [] No [X]

29.04 If yes, give full and complete information relating thereto:

1 Old Custodian	2 New Custodian	3 Date of Change	4 Reason
.....

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

1 Name of Firm or Individual	2 Affiliation
Opus Investment Management, Inc.	A.....
.....

29.0597 For those firms/individuals listed in the table for Question 29.05, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's invested assets?..... Yes [] No []

29.0598 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 29.05, does the total assets under management aggregate to more than 50% of the reporting entity's invested assets?..... Yes [] No []

29.06 For those firms or individuals listed in the table for 29.05 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1 Central Registration Depository Number	2 Name of Firm or Individual	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed
107569	Opus Investment Management, Inc.	Securities Exchange Commission	DS.....
.....

30.1 Does the reporting entity have any diversified mutual funds reported in Schedule D, Part 2 (diversified according to the Securities and Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5(b)(1)])? Yes [X] No []

30.2 If yes, complete the following schedule:

1 CUSIP #	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
808524-79-7	Schwab US Dividend ETF	1,798,468
921943-85-8	Vanguard FTSE Dev Market ETF	5,758,036
921946-40-6	Vanguard High Div Yield ETF	2,431,666
922908-76-9	Vanguard Total Stock Market Index ETF	44,205,250
46432F-84-2	iShares Core MSCI EAFE ETF	432,912
46435G-32-6	iShares Core MSCI International Dev Mkts ETF	434,411
30.2999 - Total		55,060,743

30.3 For each mutual fund listed in the table above, complete the following schedule:

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holding	4 Date of Valuation
Schwab US Dividend ETF	The Coca-Cola Co.	75,536	12/31/2021 ...
Vanguard FTSE Dev Market ETF	Nestle SA	92,129	12/31/2021 ...
Vanguard High Div Yield ETF	JP Morgan Chase & Co.	80,245	12/31/2021 ...
Vanguard Total Stock Market Index ETF	Apple Inc.	2,519,699	12/31/2021 ...
iShares Core MSCI EAFE ETF	Nestle SA	8,269	12/31/2021 ...
iShares Core MSCI International Dev Mkts ETF	Nestle SA	7,472	12/31/2021 ...
.....

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

31. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

	1	2	3
	Statement (Admitted) Value	Fair Value	Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
31.1 Bonds	1,128,784,182	1,161,243,706	32,459,524
31.2 Preferred stocks	0	0	0
31.3 Totals	1,128,784,182	1,161,243,706	32,459,524

31.4 Describe the sources or methods utilized in determining the fair values:
Fair values are obtained by a quoted market price if available, otherwise, fair values are estimated using independent pricing sources or internally developed pricing models using discounted cash flow analysis

32.1 Was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Schedule D? Yes [] No [X]

32.2 If the answer to 32.1 is yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic copy) for all brokers or custodians used as a pricing source? Yes [] No []

32.3 If the answer to 32.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:
.....

33.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Investment Analysis Office been followed? Yes [X] No []

33.2 If no, list exceptions:
.....

34. By self-designating 5GI securities, the reporting entity is certifying the following elements of each self-designated 5GI security:
a. Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
b. Issuer or obligor is current on all contracted interest and principal payments.
c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.
Has the reporting entity self-designated 5GI securities? Yes [] No [X]

35. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:
a. The security was purchased prior to January 1, 2018.
b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
c. The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as a NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.
Has the reporting entity self-designated PLGI securities? Yes [] No [X]

36. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:
a. The shares were purchased prior to January 1, 2019.
b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
c. The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.
d. The fund only or predominantly holds bonds in its portfolio.
e. The current reported NAIC Designation was derived from the public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO.
f. The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.
Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria? Yes [] No [X]

37. By rolling/renewing short-term or cash equivalent investments with continued reporting on Schedule DA, Part 1 or Schedule E Part 2 (identified through a code (%) in those investment schedules), the reporting entity is certifying to the following:
a. The investment is a liquid asset that can be terminated by the reporting entity on the current maturity date.
b. If the investment is with a nonrelated party or nonaffiliate, then it reflects an arms-length transaction with renewal completed at the discretion of all involved parties.
c. If the investment is with a related party or affiliate, then the reporting entity has completed robust re-underwriting of the transaction for which documentation is available for regulator review.
d. Short-term and cash equivalent investments that have been renewed/rolled from the prior period that do not meet the criteria in 37.a - 37.c are reported as long-term investments.
Has the reporting entity rolled/renewed short-term or cash equivalent investments in accordance with these criteria? Yes [X] No [] N/A []

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

OTHER

38.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any?\$15,625

38.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
Compensation Advisory Organization of Michigan15,625
.....

39.1 Amount of payments for legal expenses, if any?\$338,743

39.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
Gallagher & Associates, P.C.282,845
.....

40.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any?\$0

40.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
.....0
.....

GENERAL INTERROGATORIES

PART 2 - PROPERTY AND CASUALTY INTERROGATORIES

1.1

Does the reporting entity have any direct Medicare Supplement Insurance in force?

Yes [] No [X]

1.2

If yes, indicate premium earned on U. S. business only.

\$ 0

1.3

What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit?

\$ 0

1.31 Reason for excluding

1.4

Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above.

\$ 0

1.5

Indicate total incurred claims on all Medicare Supplement Insurance.

\$ 0

1.6

Individual policies:

Most current three years:

1.61 Total premium earned \$ 0

1.62 Total incurred claims \$ 0

1.63 Number of covered lives 0

All years prior to most current three years

1.64 Total premium earned \$ 0

1.65 Total incurred claims \$ 0

1.66 Number of covered lives 0

1.7

Group policies:

Most current three years:

1.71 Total premium earned \$ 0

1.72 Total incurred claims \$ 0

1.73 Number of covered lives 0

All years prior to most current three years

1.74 Total premium earned \$ 0

1.75 Total incurred claims \$ 0

1.76 Number of covered lives 0

2.

Health Test:

1

Current Year

2

Prior Year

2.1 Premium Numerator 0 0

2.2 Premium Denominator 918,411,993 878,474,117

2.3 Premium Ratio (2.1/2.2) 0.000 0.000

2.4 Reserve Numerator 0 0

2.5 Reserve Denominator 1,014,810,634 944,124,594

2.6 Reserve Ratio (2.4/2.5) 0.000 0.000

3.1

Did the reporting entity issue participating policies during the calendar year?

Yes [X] No []

3.2

If yes, provide the amount of premium written for participating and/or non-participating policies during the calendar year:

3.21 Participating policies \$ 8,396,254

3.22 Non-participating policies \$ 793,932,591

4.

For mutual reporting Entities and Reciprocal Exchanges Only:

4.1

Does the reporting entity issue assessable policies?

Yes [] No []

4.2

Does the reporting entity issue non-assessable policies?

Yes [] No []

4.3

If assessable policies are issued, what is the extent of the contingent liability of the policyholders?

% 0.0

4.4

Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums.

\$ 0

5.

For Reciprocal Exchanges Only:

5.1

Does the Exchange appoint local agents?

Yes [] No []

5.2

If yes, is the commission paid:

5.21 Out of Attorney's-in-fact compensation..... Yes [] No [] N/A []

5.22 As a direct expense of the exchange..... Yes [] No [] N/A []

5.3

What expenses of the Exchange are not paid out of the compensation of the Attorney-in-fact?

5.4

Has any Attorney-in-fact compensation, contingent on fulfillment of certain conditions, been deferred?

Yes [] No []

5.5

If yes, give full information

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

PART 2 - PROPERTY AND CASUALTY INTERROGATORIES

6.1

What provision has this reporting entity made to protect itself from an excessive loss in the event of a catastrophe under a workers' compensation contract issued without limit of loss?
The Company maintains workers' compensation coverage under its casualty excess of loss reinsurance agreement.

6.2

Describe the method used to estimate this reporting entity's probable maximum insurance loss, and identify the type of insured exposures comprising that probable maximum loss, the locations of concentrations of those exposures and the external resources (such as consulting firms or computer software models), if any, used in the estimation process.
The Company uses multiple models including RMS v18.1 and AIR Touchstone v8.2 Catastrophe Modeling software packages to estimate the Company's probable maximum loss. These exposures are a combination of personal and commercial property risks. The major concentration of losses is in the Midwest.

6.3

What provision has this reporting entity made (such as a catastrophic reinsurance program) to protect itself from an excessive loss arising from the types and concentrations of insured exposures comprising its probable maximum property insurance loss?
The Company purchases catastrophe reinsurance with an occurrence limit of \$900 million excess \$200 million with no co-participation. For occurrences from \$1.1 billion to \$1.3 billion, we have coverage for 67% of losses. Additionally, there is a program feature which provides coverage in excess of \$250 million in aggregate catastrophe losses. This feature provides \$75 million of coverage, subject to 23% co-participation, that may respond either to an event that exceeds \$1.1 billion or to events in excess of \$250 million in aggregate catastrophe losses. The catastrophe losses subject to the aggregate feature are limited only to those catastrophe losses that exceed \$5 million of incurred losses per event and are subject to a per occurrence limit of \$200 million.

6.4

Does the reporting entity carry catastrophe reinsurance protection for at least one reinstatement, in an amount sufficient to cover its estimated probable maximum loss attributable to a single loss event or occurrence?

Yes ☒ No ☐

6.5

If no, describe any arrangements or mechanisms employed by the reporting entity to supplement its catastrophe reinsurance program or to hedge its exposure to uninsured catastrophic loss.
.....

7.1

Has this reporting entity reinsured any risk with any other entity under a quota share reinsurance contract that includes a provision that would limit the reinsurer's losses below the stated quota share percentage (e.g., a deductible, a loss ratio corridor, a loss ratio cap, an aggregate limit or any similar provisions)?.....

Yes ☐ No ☒

7.2

If yes, indicate the number of reinsurance contracts containing such provisions:

0

7.3

If yes, does the amount of reinsurance credit taken reflect the reduction in quota share coverage caused by any applicable limiting provision(s)?.....

Yes ☐ No ☐

8.1

Has this reporting entity reinsured any risk with any other entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on this risk, or portion thereof, reinsured?

Yes ☐ No ☒

8.2

If yes, give full information
.....

9.1

Has the reporting entity ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates) for which during the period covered by the statement: (i) it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; (ii) it accounted for that contract as reinsurance and not as a deposit; and (iii) the contract(s) contain one or more of the following features or other features that would have similar results:
(a) A contract term longer than two years and the contract is noncancellable by the reporting entity during the contract term;
(b) A limited or conditional cancellation provision under which cancellation triggers an obligation by the reporting entity, or an affiliate of the reporting entity, to enter into a new reinsurance contract with the reinsurer, or an affiliate of the reinsurer;
(c) Aggregate stop loss reinsurance coverage;
(d) A unilateral right by either party (or both parties) to commute the reinsurance contract, whether conditional or not, except for such provisions which are only triggered by a decline in the credit status of the other party;
(e) A provision permitting reporting of losses, or payment of losses, less frequently than on a quarterly basis (unless there is no activity during the period); or
(f) Payment schedule, accumulating retentions from multiple years or any features inherently designed to delay timing of the reimbursement to the ceding entity.

Yes ☐ No ☒

9.2

Has the reporting entity during the period covered by the statement ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates), for which, during the period covered by the statement, it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; excluding cessions to approved pooling arrangements or to captive insurance companies that are directly or indirectly controlling, controlled by, or under common control with (i) one or more unaffiliated policyholders of the reporting entity, or (ii) an association of which one or more unaffiliated policyholders of the reporting entity is a member where:
(a) The written premium ceded to the reinsurer by the reporting entity or its affiliates represents fifty percent (50%) or more of the entire direct and assumed premium written by the reinsurer based on its most recently available financial statement; or
(b) Twenty-five percent (25%) or more of the written premium ceded to the reinsurer has been retroceded back to the reporting entity or its affiliates in a separate reinsurance contract.

Yes ☐ No ☒

9.3

If yes to 9.1 or 9.2, please provide the following information in the Reinsurance Summary Supplemental Filing for General Interrogatory 9:
(a) The aggregate financial statement impact gross of all such ceded reinsurance contracts on the balance sheet and statement of income;
(b) A summary of the reinsurance contract terms and indicate whether it applies to the contracts meeting the criteria in 9.1 or 9.2; and
(c) A brief discussion of management's principle objectives in entering into the reinsurance contract including the economic purpose to be achieved.

9.4

Except for transactions meeting the requirements of paragraph 36 of SSAP No. 62R, Property and Casualty Reinsurance, has the reporting entity ceded any risk under any reinsurance contract (or multiple contracts with the same reinsurer or its affiliates) during the period covered by the financial statement, and either:
(a) Accounted for that contract as reinsurance (either prospective or retroactive) under statutory accounting principles ("SAP") and as a deposit under generally accepted accounting principles ("GAAP"); or
(b) Accounted for that contract as reinsurance under GAAP and as a deposit under SAP?

Yes ☐ No ☒

9.5

If yes to 9.4, explain in the Reinsurance Summary Supplemental Filing for General Interrogatory 9 (Section D) why the contract(s) is treated differently for GAAP and SAP.

9.6

The reporting entity is exempt from the Reinsurance Attestation Supplement under one or more of the following criteria:
(a) The entity does not utilize reinsurance; or,
(b) The entity only engages in a 100% quota share contract with an affiliate and the affiliated or lead company has filed an attestation supplement; or
(c) The entity has no external cessions and only participates in an intercompany pool and the affiliated or lead company has filed an attestation supplement.

Yes ☐ No ☒
Yes ☒ No ☐
Yes ☐ No ☒

10.

If the reporting entity has assumed risks from another entity, there should be charged on account of such reinsurances a reserve equal to that which the original entity would have been required to charge had it retained the risks. Has this been done?

Yes ☒ No ☐ N/A ☐

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

PART 2 - PROPERTY AND CASUALTY INTERROGATORIES

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

11.2 If yes, give full information
.....

12.1 If the reporting entity recorded accrued retrospective premiums on insurance contracts on Line 15.3 of the asset schedule, Page 2, state the amount of corresponding liabilities recorded for:

12.11 Unpaid losses\$0

12.12 Unpaid underwriting expenses (including loss adjustment expenses)\$0

12.2 Of the amount on Line 15.3, Page 2, state the amount which is secured by letters of credit, collateral, and other funds\$0

12.3 If the reporting entity underwrites commercial insurance risks, such as workers' compensation, are premium notes or promissory notes accepted from its insureds covering unpaid premiums and/or unpaid losses? Yes [] No [X] N/A []

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

12.41 From0.0 %

12.42 To0.0 %

12.5 Are letters of credit or collateral and other funds received from insureds being utilized by the reporting entity to secure premium notes or promissory notes taken by a reporting entity, or to secure any of the reporting entity's reported direct unpaid loss reserves , including unpaid losses under loss deductible features of commercial policies? Yes [] No [X]

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

12.61 Letters of credit\$0

12.62 Collateral and other funds\$0

13.1 Largest net aggregate amount insured in any one risk (excluding workers' compensation):\$4,100,000

13.2 Does any reinsurance contract considered in the calculation of this amount include an aggregate limit of recovery without also including a reinstatement provision? Yes [] No [X]

13.3 State the number of reinsurance contracts (excluding individual facultative risk certificates, but including facultative programs, automatic facilities or facultative obligatory contracts) considered in the calculation of the amount.2

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

14.2 If yes, please describe the method of allocating and recording reinsurance among the cedants:
.....

14.3 If the answer to 14.1 is yes, are the methods described in item 14.2 entirely contained in the respective multiple cedant reinsurance contracts? Yes [] No []

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

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

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

15.2 If yes, give full information
.....

16.1 Does the reporting entity write any warranty business? Yes [] No [X]
If yes, disclose the following information for each of the following types of warranty coverage:

	1 Direct Losses Incurred	2 Direct Losses Unpaid	3 Direct Written Premium	4 Direct Premium Unearned	5 Direct Premium Earned
16.11 Home	0	0	0	0	0
16.12 Products	0	0	0	0	0
16.13 Automobile	0	0	0	0	0
16.14 Other*	0	0	0	0	0

* Disclose type of coverage:
.....

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

GENERAL INTERROGATORIES

PART 2 - PROPERTY AND CASUALTY INTERROGATORIES

17.1

Does the reporting entity include amounts recoverable on unauthorized reinsurance in Schedule F - Part 3 that is exempt from the statutory provision for unauthorized reinsurance?

Yes [☐] No [☒]

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

17.11

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

\$0

17.12

Unfunded portion of Interrogatory 17.11

\$0

17.13

Paid losses and loss adjustment expenses portion of Interrogatory 17.11.....

\$0

17.14

Case reserves portion of Interrogatory 17.11

\$0

17.15

Incurred but not reported portion of Interrogatory 17.11

\$0

17.16

Unearned premium portion of Interrogatory 17.11

\$0

17.17

Contingent commission portion of Interrogatory 17.11

\$0

18.1

Do you act as a custodian for health savings accounts?

Yes [☐] No [☒]

18.2

If yes, please provide the amount of custodial funds held as of the reporting date.

\$0

18.3

Do you act as an administrator for health savings accounts?

Yes [☐] No [☒]

18.4

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

\$0

19.

Is the reporting entity licensed or chartered, registered, qualified, eligible or writing business in at least two states?

Yes [☒] No [☐]

19.1

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

Yes [☐] No [☐]

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

FIVE-YEAR HISTORICAL DATA

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

	1 2021	2 2020	3 2019	4 2018	5 2017
Gross Premiums Written (Page 8, Part 1B Cols. 1, 2 & 3)					
1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4)	484,855,359	496,833,415	547,308,549	523,088,785	489,834,798
2. Property lines (Lines 1, 2, 9, 12, 21 & 26)	382,498,586	362,822,147	377,576,418	372,164,479	344,883,889
3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	737,700,513	712,258,343	695,096,222	652,251,439	604,949,866
4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	142,520	221,909	368,499	468,136	447,319
5. Nonproportional reinsurance lines (Lines 31, 32 & 33)	0	0	0	0	0
6. Total (Line 35)	1,605,196,978	1,572,135,814	1,620,349,688	1,547,972,839	1,440,115,872
Net Premiums Written (Page 8, Part 1B, Col. 6)					
7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4)	318,225,300	298,369,557	301,262,796	276,852,905	252,549,476
8. Property lines (Lines 1, 2, 9, 12, 21 & 26)	305,776,754	280,677,113	284,524,122	270,765,191	246,706,802
9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	327,154,018	313,583,556	307,290,069	294,515,768	273,936,185
10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	0	0	0	0	0
11. Nonproportional reinsurance lines (Lines 31, 32 & 33)	0	0	0	0	0
12. Total (Line 35)	951,156,072	892,630,226	893,076,987	842,133,864	773,192,463
Statement of Income (Page 4)					
13. Net underwriting gain (loss) (Line 8)	19,438,748	91,348,737	51,112,588	76,393,759	80,446,680
14. Net investment gain or (loss) (Line 11)	68,650,453	45,367,100	54,297,317	51,050,640	55,350,427
15. Total other income (Line 15)	1,127,207	1,477,403	1,231,998	924,938	883,531
16. Dividends to policyholders (Line 17)	13,062	29,823	(19,919)	0	11,401
17. Federal and foreign income taxes incurred (Line 19)	17,706,011	29,493,407	20,685,073	18,014,563	42,940,075
18. Net income (Line 20)	71,497,335	108,670,011	85,976,749	110,354,774	93,729,162
Balance Sheet Lines (Pages 2 and 3)					
19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3)	2,014,088,473	1,754,190,896	1,688,250,431	1,622,184,027	1,559,418,772
20. Premiums and considerations (Page 2, Col. 3)					
20.1 In course of collection (Line 15.1)	951,765	2,408,520	7,826,525	12,745,339	24,058,392
20.2 Deferred and not yet due (Line 15.2)	251,522,513	248,851,652	258,670,633	237,379,472	208,932,364
20.3 Accrued retrospective premiums (Line 15.3)	0	0	0	0	0
21. Total liabilities excluding protected cell business (Page 3, Line 26)	1,285,418,134	1,020,966,422	981,130,375	918,923,942	859,962,222
22. Losses (Page 3, Line 1)	461,436,879	426,078,481	403,911,430	380,179,680	366,560,477
23. Loss adjustment expenses (Page 3, Line 3)	75,491,264	72,907,701	66,745,790	54,773,574	51,212,509
24. Unearned premiums (Page 3, Line 9)	477,882,491	445,138,412	430,982,303	400,837,399	361,098,243
25. Capital paid up (Page 3, Lines 30 & 31)	3,400,000	3,400,000	3,400,000	3,400,000	3,400,000
26. Surplus as regards policyholders (Page 3, Line 37)	728,670,339	733,224,474	707,120,056	703,260,085	699,456,550
Cash Flow (Page 5)					
27. Net cash from operations (Line 11)	123,648,812	159,789,951	127,936,375	146,829,744	104,866,827
Risk-Based Capital Analysis					
28. Total adjusted capital	728,670,339	733,224,474	707,120,056	703,260,085	699,456,550
29. Authorized control level risk-based capital	52,886,602	48,530,768	48,043,875	46,983,109	45,319,586
Percentage Distribution of Cash, Cash Equivalents and Invested Assets (Page 2, Col. 3) (Line divided by Page 2, Line 12, Col. 3) x100.0					
30. Bonds (Line 1)	79.8	84.1	82.6	84.5	81.0
31. Stocks (Lines 2.1 & 2.2)	11.9	10.7	11.8	10.4	13.1
32. Mortgage loans on real estate (Lines 3.1 and 3.2)	0.0	0.0	0.0	0.0	0.0
33. Real estate (Lines 4.1, 4.2 & 4.3)	0.3	0.3	0.4	0.4	0.5
34. Cash, cash equivalents and short-term investments (Line 5)	2.6	(1.1)	(0.7)	(0.8)	0.5
35. Contract loans (Line 6)	0.0	0.0	0.0	0.0	0.0
36. Derivatives (Line 7)	0.0	0.0	0.0	0.0	0.0
37. Other invested assets (Line 8)	5.5	6.0	5.9	5.3	4.5
38. Receivables for securities (Line 9)	0.0	0.0	0.0	0.0	0.1
39. Securities lending reinvested collateral assets (Line 10)	0.0	0.0	0.0	0.1	0.3
40. Aggregate write-ins for invested assets (Line 11)	0.0	0.0	0.0	0.0	0.0
41. Cash, cash equivalents and invested assets (Line 12)	100.0	100.0	100.0	100.0	100.0
Investments in Parent, Subsidiaries and Affiliates					
42. Affiliated bonds (Schedule D, Summary, Line 12, Col. 1)	0	0	0	0	0
43. Affiliated preferred stocks (Schedule D, Summary, Line 18, Col. 1)	0	0	0	0	0
44. Affiliated common stocks (Schedule D, Summary, Line 24, Col. 1)	0	0	0	0	0
45. Affiliated short-term investments (subtotals included in Schedule DA Verification, Col. 5, Line 10)	0	0	0	0	0
46. Affiliated mortgage loans on real estate	0	0	0	0	0
47. All other affiliated	0	0	0	0	0
48. Total of above Lines 42 to 47	0	0	0	0	0
49. Total Investment in Parent included in Lines 42 to 47 above	0	0	0	0	0
50. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line 48 above divided by Page 3, Col. 1, Line 37 x 100.0)	0.0	0.0	0.0	0.0	0.0

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

FIVE-YEAR HISTORICAL DATA

(Continued)

	1 2021	2 2020	3 2019	4 2018	5 2017
Capital and Surplus Accounts (Page 4)					
51. Net unrealized capital gains (losses) (Line 24)	15,911,703	1,848,508	24,288,172	(10,615,312)	12,051,160
52. Dividends to stockholders (Line 35)	(90,000,000)	(82,000,000)	(106,000,000)	(87,900,000)	(99,900,000)
53. Change in surplus as regards policyholders for the year (Line 38)	(4,554,135)	26,104,418	3,859,971	3,803,535	(6,059,998)
Gross Losses Paid (Page 9, Part 2, Cols. 1 & 2)					
54. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4)	281,053,793	313,954,331	309,420,700	319,452,348	291,064,029
55. Property lines (Lines 1, 2, 9, 12, 21 & 26)	194,246,164	160,028,846	212,950,845	197,166,422	171,892,700
56. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	423,644,509	337,885,473	307,972,237	273,926,922	270,951,548
57. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	(5,760)	(271,374)	(9,860)	596,824	144,700
58. Nonproportional reinsurance lines (Lines 31, 32 & 33)	0	0	0	0	0
59. Total (Line 35)	898,938,706	811,597,276	830,333,922	791,142,516	734,052,977
Net Losses Paid (Page 9, Part 2, Col. 4)					
60. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4)	146,247,427	162,359,782	159,488,752	156,083,391	136,914,449
61. Property lines (Lines 1, 2, 9, 12, 21 & 26)	163,351,796	134,420,071	166,678,853	145,302,285	127,838,321
62. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27)	242,616,581	173,117,459	166,550,280	128,249,292	136,866,672
63. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34)	0	0	0	0	0
64. Nonproportional reinsurance lines (Lines 31, 32 & 33)	0	0	0	0	0
65. Total (Line 35)	552,215,804	469,897,312	492,717,885	429,634,968	401,619,442
Operating Percentages (Page 4) (Line divided by Page 4, Line 1) x 100.0					
66. Premiums earned (Line 1)	100.0	100.0	100.0	100.0	100.0
67. Losses incurred (Line 2)	64.0	56.0	59.8	55.2	54.4
68. Loss expenses incurred (Line 3)	7.2	7.3	7.9	6.9	7.1
69. Other underwriting expenses incurred (Line 4)	26.7	26.3	26.3	28.3	27.7
70. Net underwriting gain (loss) (Line 8)	2.1	10.4	5.9	9.5	10.8
Other Percentages					
71. Other underwriting expenses to net premiums written (Page 4, Lines 4 + 5 - 15 divided by Page 8, Part 1B, Col. 6, Line 35 x 100.0)	25.6	25.7	25.3	26.9	26.6
72. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0)	71.2	63.3	67.7	62.1	61.6
73. Net premiums written to policyholders' surplus (Page 8, Part 1B, Col. 6, Line 35 divided by Page 3, Line 37, Col. 1 x 100.0)	130.5	121.7	126.3	119.7	110.5
One Year Loss Development (\$000 omitted)					
74. Development in estimated losses and loss expenses incurred prior to current year (Schedule P - Part 2 - Summary, Line 12, Col. 11)	(26,659)	(9,576)	1,287	4,167	(13,407)
75. Percent of development of losses and loss expenses incurred to policyholders' surplus of prior year end (Line 74 above divided by Page 4, Line 21, Col. 1 x 100.0)	(3.6)	(1.4)	0.2	0.6	(1.9)
Two Year Loss Development (\$000 omitted)					
76. Development in estimated losses and loss expenses incurred two years before the current year and prior year (Schedule P, Part 2 - Summary, Line 12, Col. 12)	(19,107)	(7,380)	5,616	(9,189)	(23,880)
77. Percent of development of losses and loss expenses incurred to reported policyholders' surplus of second prior year end (Line 76 above divided by Page 4, Line 21, Col. 2 x 100.0)	(2.7)	(1.0)	0.8	(1.3)	(3.6)

NOTE: If a party to a merger, have the two most recent years of this exhibit been restated due to a merger in compliance with the disclosure requirements of SSAP No. 3, Accounting Changes and Correction of Errors? Yes [] No []

If no, please explain:

SCHEDULE P - ANALYSIS OF LOSSES AND LOSS EXPENSES
SCHEDULE P - PART 1 - SUMMARY

(\$000 OMITTED)

Years in Which Premiums Were Earned and Losses Were Incurred	Premiums Earned			Loss and Loss Expense Payments								12
	1 Direct and Assumed	2 Ceded	3 Net (1 - 2)	Loss Payments		Defense and Cost Containment Payments		Adjusting and Other Payments		10	11	Number of Claims Reported Direct and Assumed
				4 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded	Salvage and Subrogation Received	Total Net Paid Cols (4 - 5 + 6 - 7 + 8 - 9)	
1. Prior.....	XXX	XXX	XXX	45,959	42,697	1,520	425	685	46	20	4,996	XXX
2. 2012.....	1,290,123	590,963	699,160	722,943	285,250	30,111	17,465	91,144	40,741	10,870	500,742	XXX
3. 2013.....	1,284,203	590,623	693,579	618,096	239,023	29,976	17,879	89,552	40,294	10,576	440,427	XXX
4. 2014.....	1,251,662	584,501	667,161	708,153	258,579	34,640	20,522	86,027	43,421	12,927	506,296	XXX
5. 2015.....	1,270,096	595,895	674,201	650,094	290,372	35,885	19,495	78,978	47,649	10,753	407,440	XXX
6. 2016.....	1,304,100	616,645	687,455	599,619	236,437	35,241	18,900	77,292	45,558	10,331	411,256	XXX
7. 2017.....	1,391,275	644,046	747,229	704,266	287,292	41,046	23,584	81,845	45,589	11,001	470,692	XXX
8. 2018.....	1,489,537	687,142	802,395	697,180	277,071	38,585	22,866	77,683	44,522	13,490	468,989	XXX
9. 2019.....	1,579,890	716,958	862,932	718,336	242,564	26,425	14,089	81,213	42,894	13,254	526,427	XXX
10. 2020.....	1,586,140	707,666	878,474	600,765	209,813	13,765	7,267	74,423	37,558	14,678	434,315	XXX
11. 2021.....	1,586,236	667,824	918,412	510,705	135,735	5,304	3,024	68,010	29,411	15,019	415,849	XXX
12. Totals	XXX	XXX	XXX	6,576,114	2,504,835	292,497	165,516	806,852	417,683	122,919	4,587,429	XXX

	Losses Unpaid				Defense and Cost Containment Unpaid				Adjusting and Other Unpaid		23	24	25
	Case Basis		Bulk + IBNR		Case Basis		Bulk + IBNR						
	13	14	15	16	17	18	19	20	21	22			
	Direct and Assumed	Ceded	Direct and Assumed	Ceded	Direct and Assumed	Ceded	Direct and Assumed	Ceded	Direct and Assumed	Ceded			
1. Prior.....	173,645	149,672	264,260	249,048	1,189	906	8,326	3,887	1,817	262	2	45,461	XXX
2. 2012.....	7,945	7,007	43,077	42,427	365	330	1,961	1,171	100	33	2	2,480	XXX
3. 2013.....	11,688	9,634	35,643	35,073	638	511	2,260	1,317	102	45	6	3,751	XXX
4. 2014.....	9,750	8,601	31,626	31,193	565	556	3,040	2,066	149	113	11	2,601	XXX
5. 2015.....	15,967	14,431	45,616	44,124	1,116	1,111	4,243	2,640	200	134	22	4,700	XXX
6. 2016.....	24,514	20,617	51,784	50,678	2,433	2,138	4,252	2,368	345	227	51	7,299	XXX
7. 2017.....	40,655	33,755	55,125	52,360	3,002	2,800	7,622	4,877	693	479	188	12,825	XXX
8. 2018.....	63,582	48,427	68,755	65,014	5,782	4,790	10,155	6,337	1,378	892	561	24,192	XXX
9. 2019.....	105,679	72,990	99,911	86,883	6,979	6,163	20,862	13,862	2,456	1,655	1,268	54,333	XXX
10. 2020.....	111,221	63,382	160,042	110,783	4,830	3,808	34,510	21,848	3,955	1,852	2,508	112,887	XXX
11. 2021.....	203,297	107,138	296,745	155,851	3,896	3,079	52,824	31,655	13,171	5,811	8,816	266,399	XXX
12. Totals	767,942	535,654	1,152,583	923,434	30,794	26,190	150,054	92,029	24,367	11,505	13,435	536,928	XXX

	Total Losses and Loss Expenses Incurred			Loss and Loss Expense Percentage (Incurred /Premiums Earned)			Nontabular Discount		34 Inter-Company Pooling Participation Percentage	Net Balance Sheet Reserves After Discount	
	26	27	28	29	30	31	32	33		35	36
	Direct and Assumed	Ceded	Net	Direct and Assumed	Ceded	Net	Loss	Loss Expense		Losses Unpaid	Loss Expenses Unpaid
1. Prior.....	XXX	XXX	XXX	XXX	XXX	XXX	0	0	XXX	39,185	6,276
2. 2012.....	897,645	394,424	503,222	69.6	66.7	72.0	0	0	0.0	1,588	892
3. 2013.....	787,955	343,776	444,178	61.4	58.2	64.0	0	0	0.0	2,624	1,127
4. 2014.....	873,949	365,052	508,897	69.8	62.5	76.3	0	0	0.0	1,582	1,019
5. 2015.....	832,097	419,958	412,140	65.5	70.5	61.1	0	0	0.0	3,027	1,673
6. 2016.....	795,480	376,925	418,555	61.0	61.1	60.9	0	0	0.0	5,002	2,297
7. 2017.....	934,254	450,737	483,517	67.2	70.0	64.7	0	0	0.0	9,665	3,160
8. 2018.....	963,100	469,919	493,181	64.7	68.4	61.5	0	0	0.0	18,896	5,296
9. 2019.....	1,061,860	481,099	580,761	67.2	67.1	67.3	0	0	0.0	45,717	8,616
10. 2020.....	1,003,512	456,310	547,202	63.3	64.5	62.3	0	0	0.0	97,099	15,788
11. 2021.....	1,153,952	471,704	682,248	72.7	70.6	74.3	0	0	0.0	237,052	29,346
12. Totals	XXX	XXX	XXX	XXX	XXX	XXX	0	0	XXX	461,437	75,491

Note: Parts 2 and 4 are gross of all discounting, including tabular discounting. Part 1 is gross of only nontabular discounting, which is reported in Columns 32 and 33 of Part 1. The tabular discount, if any, is reported in the Notes to Financial Statements which will reconcile Part 1 with Parts 2 and 4.

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

SCHEDULE P - PART 2 - SUMMARY

Years in Which Losses Were Incurred	INCURRED NET LOSSES AND DEFENSE AND COST CONTAINMENT EXPENSES REPORTED AT YEAR END (\$000 OMITTED)										DEVELOPMENT	
	1 2012	2 2013	3 2014	4 2015	5 2016	6 2017	7 2018	8 2019	9 2020	10 2021	11 One Year	12 Two Year
1. Prior.....	274,916	268,238	269,741	262,119	253,750	249,900	249,127	241,672	239,816	236,535	(3,281)	(5,137)
2. 2012.....	463,235	466,475	462,641	457,595	458,296	458,044	456,779	453,582	453,193	452,751	(442)	(832)
3. 2013.....	XXX	418,368	413,672	400,377	398,849	397,258	396,913	396,084	395,182	394,864	(318)	(1,220)
4. 2014.....	XXX	XXX	474,767	468,808	467,974	468,114	469,289	468,386	466,871	466,255	(615)	(2,131)
5. 2015.....	XXX	XXX	XXX	392,910	391,293	384,611	384,347	383,554	381,169	380,746	(424)	(2,809)
6. 2016.....	XXX	XXX	XXX	XXX	379,225	378,052	383,744	388,117	387,480	386,703	(777)	(1,413)
7. 2017.....	XXX	XXX	XXX	XXX	XXX	437,497	437,445	447,698	448,395	447,047	(1,348)	(651)
8. 2018.....	XXX	XXX	XXX	XXX	XXX	XXX	460,668	460,506	458,826	459,534	708	(973)
9. 2019.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	545,582	544,674	541,641	(3,033)	(3,941)
10. 2020.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	525,361	508,233	(17,128)	XXX
11. 2021.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	636,289	XXX	XXX
12. Totals											(26,659)	(19,107)

SCHEDULE P - PART 3 - SUMMARY

Years in Which Losses Were Incurred	CUMULATIVE PAID NET LOSSES AND DEFENSE AND COST CONTAINMENT EXPENSES REPORTED AT YEAR END (\$000 OMITTED)										11 Number of Claims Closed With Loss Payment	12 Number of Claims Closed Without Loss Payment
	1	2	3	4	5	6	7	8	9	10		
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021		
1. Prior.....	.000	76,886	125,997	149,568	161,982	170,884	175,993	181,891	188,271	192,628	XXX	XXX
2. 2012.....	289,623	377,944	416,473	436,295	445,304	448,309	449,836	449,815	450,166	450,338	XXX	XXX
3. 2013.....	XXX	249,637	325,847	362,474	379,701	387,123	388,927	390,453	390,945	391,169	XXX	XXX
4. 2014.....	XXX	XXX	319,066	392,983	424,623	449,036	460,774	462,811	463,243	463,691	XXX	XXX
5. 2015.....	XXX	XXX	XXX	233,867	310,579	345,067	368,297	374,154	375,896	376,111	XXX	XXX
6. 2016.....	XXX	XXX	XXX	XXX	224,456	301,592	347,629	368,208	376,502	379,522	XXX	XXX
7. 2017.....	XXX	XXX	XXX	XXX	XXX	264,451	356,211	401,597	424,222	434,435	XXX	XXX
8. 2018.....	XXX	XXX	XXX	XXX	XXX	XXX	267,320	371,318	412,474	435,828	XXX	XXX
9. 2019.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	326,617	441,418	488,108	XXX	XXX
10. 2020.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	291,562	397,450	XXX	XXX
11. 2021.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	377,250	XXX	XXX

SCHEDULE P - PART 4 - SUMMARY

Years in Which Losses Were Incurred	BULK AND IBNR RESERVES ON NET LOSSES AND DEFENSE AND COST CONTAINMENT EXPENSES REPORTED AT YEAR END (\$000 OMITTED)									
	1	2	3	4	5	6	7	8	9	10
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
1. Prior.....	104,030	73,085	63,737	55,382	44,812	37,720	37,724	29,496	26,974	19,650
2. 2012.....	75,853	25,863	13,841	6,725	7,025	5,327	4,460	2,261	1,968	1,439
3. 2013.....	XXX	87,333	31,983	10,201	5,341	4,327	4,142	2,795	2,113	1,514
4. 2014.....	XXX	XXX	79,582	22,389	9,335	6,095	3,665	3,285	2,070	1,407
5. 2015.....	XXX	XXX	XXX	76,374	22,307	10,249	4,745	4,904	2,938	3,094
6. 2016.....	XXX	XXX	XXX	XXX	72,165	18,415	7,645	5,950	4,070	2,990
7. 2017.....	XXX	XXX	XXX	XXX	XXX	91,798	25,818	12,909	9,102	5,509
8. 2018.....	XXX	XXX	XXX	XXX	XXX	XXX	106,816	31,432	14,660	7,559
9. 2019.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	127,568	42,244	20,027
10. 2020.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	155,315	61,922
11. 2021.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	162,064

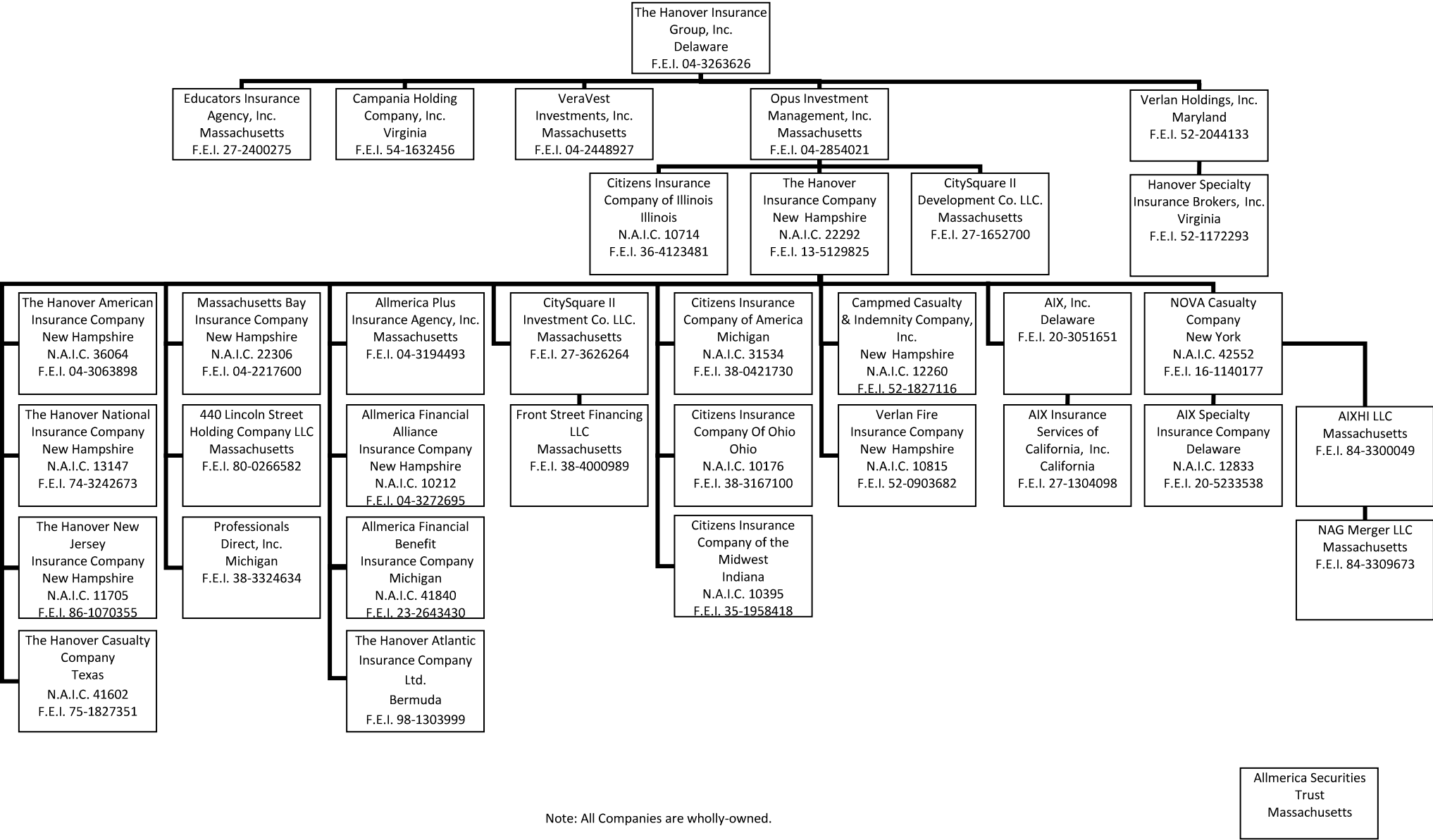
SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories											
States, Etc.		1 Active Status (a)	Gross Premiums, Including Policy and Membership Fees, Less Return Premiums and Premiums on Policies Not Taken		4 Dividends Paid or Credited to Policyholders on Direct Business	5 Direct Losses Paid (Deducting Salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Finance and Service Charges Not Included in Premiums	9 Direct Premiums Written for Federal Purchasing Groups (Included in Column 2)	
			2 Direct Premiums Written	3 Direct Premiums Earned							
1.	Alabama	AL	L	1,879,584	2,134,091	0	439,081	841,034	1,314,151	1,332	0
2.	Alaska	AK	L	500	811	0	0	290	431	0	0
3.	Arizona	AZ	L	6,680,697	6,700,004	0	7,074,869	14,758,634	11,602,594	25,187	0
4.	Arkansas	AR	L	75,433	62,617	0	2,349	16,985	20,582	78	0
5.	California	CA	L	45,380,986	46,226,462	0	24,578,883	19,019,403	62,834,337	92,813	0
6.	Colorado	CO	L	8,583,278	8,385,627	0	2,077,330	4,143,393	7,346,781	21,616	0
7.	Connecticut	CT	L	22,341,033	22,366,842	0	10,226,540	15,509,962	29,392,064	49,045	0
8.	Delaware	DE	L	1,197,074	1,208,298	0	181,546	304,657	436,335	2,941	0
9.	District of Columbia	DC	L	773,286	718,315	0	235,021	219,771	355,157	562	0
10.	Florida	FL	N	0	0	0	0	0	0	0	0
11.	Georgia	GA	L	20,318,496	20,663,230	0	8,806,499	14,347,430	18,204,381	43,967	0
12.	Hawaii	HI	L	6,653	4,165	0	0	1,874	2,264	0	0
13.	Idaho	ID	L	319,614	278,814	0	10,761	21,413	387,794	303	0
14.	Illinois	IL	L	42,751,732	43,278,073	8,833	24,026,481	26,550,561	36,442,266	109,312	0
15.	Indiana	IN	L	14,510,142	14,760,444	44	12,961,009	7,941,061	21,348,891	14,363	0
16.	Iowa	IA	L	615,431	694,438	0	272,071	334,538	300,795	154	0
17.	Kansas	KS	L	1,071,747	1,146,310	0	455,604	254,520	537,934	1,947	0
18.	Kentucky	KY	N	0	0	0	0	0	0	0	0
19.	Louisiana	LA	N	0	0	0	0	0	0	0	0
20.	Maine	ME	L	46,827,752	46,256,920	0	17,291,043	24,300,526	33,700,633	247,932	0
21.	Maryland	MD	L	2,116,407	1,996,387	0	251,658	740,896	1,292,607	2,235	0
22.	Massachusetts	MA	L	188,785,042	196,884,033	800	82,354,385	100,254,684	116,133,982	1,304,491	0
23.	Michigan	MI	L	173,575,670	185,970,157	13,018	175,444,921	95,757,306	648,861,352	337,566	0
24.	Minnesota	MN	L	24,897,563	25,144,518	33,818	10,720,935	8,233,673	18,893,836	29,422	0
25.	Mississippi	MS	L	6,452	10,830	0	10,789	(29,017)	12,043	73	0
26.	Missouri	MO	L	3,406,433	3,350,937	0	708,045	1,012,923	2,254,294	5,441	0
27.	Montana	MT	L	273,633	228,889	0	77,005	62,954	28,336	61	0
28.	Nebraska	NE	L	177,553	138,720	0	18,392	36,049	41,264	12	0
29.	Nevada	NV	L	2,469,673	2,142,414	0	195,650	605,580	1,163,265	5,807	0
30.	New Hampshire	NH	L	15,305,708	15,573,469	0	4,492,257	3,846,747	13,073,890	34,318	0
31.	New Jersey	NJ	L	34,195,517	34,304,044	0	14,840,978	18,165,099	41,278,090	60,349	0
32.	New Mexico	NM	L	176,917	216,542	0	64,935	105,038	86,032	480	0
33.	New York	NY	L	49,250,232	49,396,623	(53)	21,399,752	24,222,900	95,981,720	131,712	0
34.	North Carolina	NC	L	3,003,049	2,915,244	0	651,085	633,600	1,512,995	5,399	0
35.	North Dakota	ND	L	794,699	560,976	0	36,856	142,570	191,097	0	0
36.	Ohio	OH	L	14,563,204	12,882,619	0	4,761,730	9,349,769	11,045,077	27,022	0
37.	Oklahoma	OK	L	63,186	62,479	0	0	149	20,326	287	0
38.	Oregon	OR	L	77,808	71,579	0	549	30,493	51,979	500	0
39.	Pennsylvania	PA	L	13,109,794	12,608,714	0	8,791,618	22,774,340	27,044,588	30,101	0
40.	Rhode Island	RI	L	4,161,325	4,326,052	0	1,608,893	1,870,242	4,772,294	9,110	0
41.	South Carolina	SC	L	8,358,809	8,282,692	0	3,363,026	4,770,754	10,543,996	15,102	0
42.	South Dakota	SD	L	583,419	527,721	0	1,390,818	3,645,065	2,754,470	205	0
43.	Tennessee	TN	L	594,405	529,234	30	266,622	103,619	627,243	2,608	0
44.	Texas	TX	L	954,124	1,014,696	0	240,240	407,228	603,474	4,004	0
45.	Utah	UT	L	2,446,274	2,296,148	0	2,378,254	786,098	1,604,539	8,927	0
46.	Vermont	VT	L	3,198,320	3,165,585	0	862,498	1,512,567	2,361,809	6,014	0
47.	Virginia	VA	L	14,922,942	14,825,047	0	8,124,474	10,420,502	11,933,178	31,107	0
48.	Washington	WA	L	7,052,485	6,584,789	0	2,842,663	3,671,387	4,191,623	20,176	0
49.	West Virginia	WV	L	17,684	15,249	0	0	387	4,381	17	0
50.	Wisconsin	WI	L	20,666,125	20,470,441	1,446,908	9,892,504	8,651,730	15,901,909	22,774	0
51.	Wyoming	WY	N	0	0	0	0	0	0	0	0
52.	American Samoa	AS	N	0	0	0	0	0	0	0	0
53.	Guam	GU	N	0	0	0	0	0	0	0	0
54.	Puerto Rico	PR	N	0	0	0	0	0	0	0	0
55.	U.S. Virgin Islands	VI	N	0	0	0	0	0	0	0	0
56.	Northern Mariana Islands	MP	N	0	0	0	0	0	0	0	0
57.	Canada	CAN	N	0	0	0	0	0	0	0	0
58.	Aggregate other alien	OT	XXX	0	0	0	0	141	141	0	0
59.	Totals	XXX		802,537,890	821,382,289	1,503,398	464,430,619	450,351,525	1,258,493,220	2,706,872	0
DETAILS OF WRITE-INS											
58001.	CHN China		XXX	0	0	0	0	141	141	0	0
58002.			XXX								
58003.			XXX								
58998.	Summary of remaining write-ins for Line 58 from overflow page		XXX	0	0	0	0	0	0	0	0
58999.	Totals (Lines 58001 through 58003 plus 58998)(Line 58 above)		XXX	0	0	0	0	141	141	0	0

(a) Active Status Counts:
L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG.....47 R - Registered - Non-domiciled RRGs.....0
E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - see DSLI).....0 Q - Qualified - Qualified or accredited reinsurer.....0
D - Domestic Surplus Lines Insurer (DSLI) - Reporting entities authorized to write surplus business in the state10
lines in the state of domicile.....0

(b) Explanation of basis of allocation of premiums by states, etc.
Fire, Allied Lines, Homeowners, Commercial multiple peril, Earthquake, Glass, Burglary, Boiler and Machinery - location of property insured. Ocean Marine - state contract was negotiated. Inland Marine - location of insured. Liability other than auto - location of insured plant. Auto liability and physical damage - place of principal garage. Workers' Compensation - state in which work is performed. Fidelity: forgery bonds - location of insured; of employer; All Other - location of employer. Surety: Judicial bonds - location of court; License bonds - location of obligee; Contracts - location of work; Supply bonds - location of contractors; All other - location of principal.

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



Affiliated Investment Management
Company

ANNUAL STATEMENT FOR THE YEAR 2021 OF THE CITIZENS INSURANCE COMPANY OF AMERICA

OVERFLOW PAGE FOR WRITE-INS

Additional Write-ins for Underwriting and Investment Exhibit Part 3 Line 24

		1	2	3	4
		Loss Adjustment Expenses	Other Underwriting Expenses	Investment Expenses	Total
2404.	Outside Data Processing Costs	1,528,982	4,894,051	349,107	6,772,140
2405.	Technology Outsourcing Costs	1,894,339	6,255,424	540	8,150,303
2406.	Miscellaneous Expenses	381,034	851,775	57,239	1,290,048
2497.	Summary of remaining write-ins for Line 24 from overflow page	3,804,355	12,001,250	406,886	16,212,491