

CAUSE NO. D-1-GN-18-001285

THE TEXAS DEPARTMENT OF	§	IN THE DISTRICT COURT OF
INSURANCE,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
ACCESS INSURANCE COMPANY,	§	
<i>Defendant.</i>	§	261 ST JUDICIAL DISTRICT

APPLICATION TO APPROVE FIFTH EARLY ACCESS DISTRIBUTION

TO THE HONORABLE JUDGE OF SAID COURT:

CANTILO & BENNETT, L.L.P., solely in its capacity as Special Deputy Receiver of Access Insurance Company (the “SDR” and “AIC” respectively), files this Application to Approve Fifth Early Access Distribution (“Application”).

I. INTRODUCTION

1.1 The SDR files this Application for authority to make a fifth early access distribution to the insurance guaranty associations affected by the AIC receivership (collectively, the “Affected Associations”), as reflected on **Exhibit 2** to the Application. The SDR requests authority to distribute \$2,721,981.02 representing the amounts paid by the Affected Associations for Class 1 expenses and Class 2 loss and unearned premium claims reported as of September 30, 2025, that have not already been paid by prior early access distributions. This early access payment would fully pay the agreed approved Class 1 expense and Class 2 loss and unearned premium claims of each of the Affected Associations.

II. AUTHORITY

2.1 The SDR is authorized to file this Application pursuant to TEX. INS. CODE § 443.303, which provides for early access distributions to insurance guaranty associations with the approval of this Court.

2.2 The subject matter of this Application is referred to the Special Master appointed in this proceeding in accordance with Paragraph III of the *Order of Reference to Master* entered on March 21, 2018.

III. BACKGROUND

3.1 On March 13, 2018, the Court entered an *Agreed Order Appointing Liquidator, Permanent Injunction, and Notice of Automatic Stay* (the “Liquidation Order”) appointing the Texas Commissioner of Insurance as Liquidator of AIC. Effective March 13, 2018, the Texas Commissioner of Insurance, as Liquidator, appointed CANTILO & BENNETT, L.L.P. as Special Deputy Receiver of AIC.

3.2 On August 3, 2018, the SDR filed its *Report Pursuant to TEX. INS. CODE § 443.303(c)*, reporting that the SDR had not had sufficient time to calculate “distributable assets” at that time.

3.3 On December 6, 2019, this Court granted the SDR’s Application to Approve First Early Access Distribution authorizing the SDR to distribute \$55,310,174 to the Affected Associations representing the amounts paid by the associations for Class 1 expenses and Class 2 loss claims as of August 31, 2019, less certain credits. The SDR distributed the money in January 2020. In April 2020, a \$46,719.50 statutory deposit held with US Bank for the benefit of the State of Georgia was released to the Georgia Insurers Insolvency Pool and treated as an early access payment.

3.4 On March 5, 2021, this Court granted the SDR’s Application to Approve Second Early Access Distribution authorizing the SDR to distribute \$64,648,174 to the Affected Associations representing the amounts paid by the associations for Class 1 expenses and Class 2 loss and unearned premium claims as of October 31, 2020, less certain credits. The SDR distributed the money in April 2021.

3.5 On October 5, 2022, this Court granted the SDR's Application to Approve Third Early Access Distribution authorizing the SDR to distribute \$15,234,286.07 to the Affected Associations representing the amounts paid by the associations for Class 1 expenses and Class 2 loss and unearned premium claims as of May 31, 2022, less certain credits. The SDR distributed the money in November of 2022. In January 2023, the South Carolina and Mississippi guaranty associations returned \$835,677 in excess distributions to the SDR.

3.6 On June 4, 2024, this Court granted the SDR's Application to Approve Fourth Early Access Distribution authorizing the SDR to distribute \$4,346,854.68 to the Affected Associations representing the amounts paid by the association for Class 1 and Class 2 loss and unearned premium claims as of February 29, 2024, less certain credits. The SDR distributed the money in July 2024.

3.7 The SDR has determined that the estate has additional distributable assets and now seeks Receivership Court authority to make a fifth early access distribution to the Affected Associations.

IV. STATUTORY REQUIREMENTS

4.1 Pursuant to TEX. INS. CODE § 443.303, the SDR shall apply to the Court for approval to make early access payments to a guaranty association having obligations in connection with the liquidation as soon as possible after the entry of the order of liquidation. Thereafter, the SDR must make distributions thereafter as frequently as possible but at least annually if distributable assets are available. Early access payments are not limited to the claims and expenses paid to date by a guaranty association; however, the SDR may not make a distribution to a guaranty association in excess of all anticipated claims of the guaranty association. Deposits or assets advanced to a guaranty association are treated as advances against distributions to be made under TEX. INS. CODE § 443.302.

4.2 TEX. INS. CODE § 443.303(c) provides:

Within 120 days after the entry of an order of liquidation by the receivership court, and at least annually after the entry of the order, the liquidator shall apply to the receivership court for approval to make early access payments out of the general assets of the insurer to any guaranty associations having obligations arising in connection with the liquidation or shall report that there are no distributable assets at that time based on financial reporting as required in Section 443.016. . . .

TEX. INS. CODE § 443.303(f) directs that an application for early access payments shall, based on the best information available to the SDR at the time, provide the following:

- (1) the amount reserved for the entire expenses of the liquidation through and after its closure and for distributions on claims, to the extent necessary and appropriate;
- (2) the computation of distributable assets and the amount and method of equitable allocation of early access payments to each of the guaranty associations; and
- (3) the most recent financial information filed with the National Association of Insurance Commissioners.

V. DISTRIBUTABLE ASSETS

5.1 TEX. INS. CODE § 443.303(a) defines “distributable assets” as all general assets of the receivership estate, less the necessary and appropriate amounts reserved for expenses of liquidation through and after closure and distributions on claims other than those of the guaranty associations that fall within the priority classes of claims established in Section 443.301(b). As of September 30, 2025, the cash assets of the receivership estate were \$60,304,820. Copies of the September 30, 2025, Statement of Assets and Statement of Liabilities are attached as **Exhibits 1-A** and **1-B**, respectively. The amounts to be paid to the Affected Associations would fully pay the final agreed approved POCs for the Affected Associations.

5.2 The SDR estimates that the expenses of the liquidation through and after its closing are approximately \$5 million. After adjustment for expenses of liquidation, the anticipation of future recoveries and losses, and establishing a prudent reserve, the SDR’s preliminary estimate for liquid “distributable assets” for the fifth early access distribution exceeds the approximately

\$2.7 million necessary to cover all of the Affected Associations' loss payments and paid expenses for which an early access distribution has not already been made.

5.2 The SDR's preliminary estimate for "distributable assets" is based upon current projections of the receivership's future activities. The receivership reserves may change substantially due to unforeseen factors beyond the SDR's control.

VI. GUARANTY ASSOCIATION CLAIMS

6.1 Pursuant to TEX. INS. CODE § 443.252(d), all Affected Associations report their expense and loss payments and reserves through the Uniform Data Standards ("UDS") protocol of the National Conference of Insurance Guaranty Funds. UDS is an electronic communication protocol that uses a series of defined computer file formats to permit guaranty associations to report insolvency-related claims to receivers electronically. In summary, as of September 30, 2025, the Affected Associations report as follows:

- a) Agreed Approved Class 1 claims of \$48,506,437.56; and
- b) Agreed Approved Class 2 claims of \$92,986,739.30 (including return of unearned premium).

6.2 At this time, the SDR seeks to make early access distributions based on the agreed approved Class 1 and on the agreed approved Class 2 claims. The Schedule attached as **Exhibit 2** sets out the agreed approved Class 1 and Class 2 claims for the Affected Associations. As of the date of this Application, the New Mexico and the North Carolina guaranty associations have not reported any expense or loss claim payments or reserves, so those associations will not receive distributions at this time. Five other associations (Arkansas, Indiana, Mississippi, Nevada, and Tennessee) have already been paid the full amount they are owed, so these associations also will not receive distributions.

VII. PROPOSED DISTRIBUTION

7.1 The SDR proposes to distribute \$2,721,981.02 from the receivership estate as the fifth early access distribution to the Affected Associations in the amounts set out on **Exhibit 2**. The SDR agrees to make the distribution within thirty (30) business days after the date the Order is entered by the Receivership Court, unless a motion for new trial or an appeal is filed, or an order staying the distribution is entered and not yet expired.

VIII. NOTICE

8.1 The SDR has served this Application to all known parties at interest and all individuals and entities identified by the SDR in the Certificate of Service including the Affected Associations, by e-mail and, as noted, by mail or overnight delivery to certain state and federal agencies. Further, the SDR has provided the Affected Associations with the thirty (30) days' actual notice of the filing of the application and the application itself as required by TEX. INS. CODE § 443.303(e) by setting the Application for submission to the Special Master more than thirty (30) days after its filing and service.

IX. OFFER OF PROOF AND VERIFICATION

9.1 This Application is verified by the affidavit and certification pursuant to TEX. INS. CODE § 443.017(b) of Susan E. Salch, designated representative of CANTILO & BENNETT, L.L.P., solely in its capacity as Special Deputy Receiver of Access Insurance Company.

X. NOTICE OF ELECTRONIC SERVICE REQUIREMENT

10.1 All pleadings filed in response to this Application shall be served by e-mail on the undersigned counsel and all parties shown in the attached Certificate of Service.

PRAYER

WHEREFORE, PREMISES CONSIDERED, CANTILO & BENNETT, L.L.P., solely in its capacity as SDR of Access Insurance Company, respectfully prays that this Court enter an order:

1. Granting the Application in all respects;
2. Authorizing the SDR to distribute \$2,721,981.02 from the assets of the receivership estate to the Affected Associations as the fifth early access distribution pursuant to TEX. INS. CODE § 443.303 as set out in **Exhibit 2**;
3. Authorizing the SDR to make the fifth early access distribution within thirty (30) business days after the date the Order is entered by the Receivership Court, unless a motion for new trial or an appeal is filed, or an order staying the distribution is entered and not yet expired;
4. Ordering the Affected Associations to return to the SDR any amount of the fifth and any other early access distribution that may be required to pay secured creditors and other claims as provided in TEX. INS. CODE § 443.303(g);
5. Authorizing the SDR to take any actions necessary to implement the Order;
6. Finding that the Order constitutes a final order fully resolving all issues relating to this Application, provided that this Court may issue further orders pursuant to TEX. INS. CODE Chapter 443.303; and
7. Granting the SDR such other and further relief to which it may be justly entitled.

Respectfully submitted,

By: /s/ Greg Pierce
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State Bar No. 15994250
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gpierce@gpiercelaw.com

**Attorney for CANTILO & BENNETT, L.L.P.,
Special Deputy Receiver of Access Insurance Co.**

CERTIFICATE OF SERVICE

I certify that on November 5, 2025, a true and correct copy of this Application was served pursuant to TEX. INS. CODE § 443.007(d) and § 443.303(e), the Order of Reference, and the Court's order requiring electronic service on the following by electronic mail, except as specifically noted.

Via Email: specialmasterclerk@tdi.texas.gov

Tom Collins, Receivership Master
c/o Special Master's Clerk
RLO MC-FRD
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Austin, TX 78711-2030

Via e-Service: Shawn.Martin@tdi.texas.gov

Shawn Martin
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Via First Class Mail

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/s/ Greg Pierce
Gregory A. Pierce

APPLICANT'S NOTICE OF SUBMISSION

Pursuant to the terms of the Order of Reference to Master entered by the District Court in this cause, the SDR's *Application to Approve Fifth Early Access Distribution* is hereby set for written submission before the Special Master, Tom Collins, on **December 8, 2025**.

The Special Master has asked that the following rules be provided you:

1. Any objection must be filed with the Travis County District Clerk at least three (3) calendar days before the submission date.
2. A copy of any objection shall be served by email by such date on:
 - (a) The Special Master's Docket Clerk, at specialmasterclerk@tdi.texas.gov;
 - (b) The undersigned counsel, Greg Pierce at gpierce@gpierceclaw.com; and
 - (c) All interested parties, including those listed on the SDR's Certificate of Service.
3. The objecting party shall coordinate with the SDR's counsel and the Docket Clerk [(512) 676-6915]] to obtain an oral hearing setting for argument on the Application and Objection, and complete and attach an "Objecting Party's Notice of Oral Hearing" to the objection.
4. The written objection must specifically list all reasons for objection with supporting references to and discussion of statutory and case authorities. Reasons not stated in writing will not be considered orally.
5. **Please note that if an objection is not filed as described in the Notice of Submission, the Master may consider the Application without a hearing.**
6. **Failure to file timely a written objection before the Special Master constitutes a waiver of the right to object to the Special Master's recommendation to the District Court.**
7. Any Acknowledgment of Notice and Waiver to be filed by the Guaranty Association or other interested party should be filed at least three (3) calendar days before the submission or hearing date.

/s/ Greg Pierce/

Greg Pierce

**SPECIAL DEPUTY RECEIVER'S VERIFICATION AND CERTIFICATION
PURSUANT TO TEX. INS.CODE ANN. §443.017(b)**

AFFIDAVIT OF SUSAN E. SALCH

State of Texas

County of Travis

BEFORE ME, the undersigned authority appeared Susan E. Salch, who after being by me duly sworn, stated the following under oath:

1. "My name is Susan E. Salch. I am of sound mind, capable of making this affidavit, and am competent to testify to the matters contained in this affidavit.
2. I am a partner in CANTILO & BENNETT, L.L.P., the Special Deputy Receiver of Access Insurance Company (the "SDR" and "AIC" respectively), I am duly authorized to make this Affidavit on behalf of the SDR.
3. I have reviewed the Application to Approve Fifth Early Access Distribution and the facts stated therein are true and correct based on my personal knowledge, my review of estate records and my consultation with the staff and subcontractors.
4. I certify that the exhibits, books, accounts, records, papers, correspondence, and/or other records and documents attached hereto were produced pursuant to TEX. INS. CODE § 443.017, are either true and correct copies of records of AIC and were received from the custody of AIC or found among its effects, or were created by and filed with the Receiver's office in connection with the receivership of this delinquent company, and are held by the Special Deputy Receiver in its official capacity."

By: *Susan E. Salch*
Susan E. Salch

SUBSCRIBED AND SWORN TO BEFORE ME on October 31, 2025, by
Susan E. Salch, Special Deputy Receiver of Access Insurance Company

Patricia Muniz

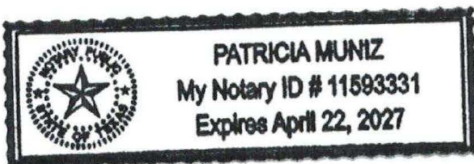


EXHIBIT 1-A

EXHIBIT 1-B

Access Insurance Co
Statement of Net Liabilities

For Period Ending
09/30/25

Line		09/30/25
1	Secured Claims	
2	APF Loan	
3	Special Deposit Claims	
Administrative Claims - Class 1		
4	Administrative Claims - State/Receiver	
	Special Deputy Receiver, Subcontractors Fees & Expenses	53,897
	Liquidation Oversight	3,047
	Special Master's Fees	16
5	Administrative Claims - Guaranty Assns	
	Administrative Expense Paid	30,078,229
	Administrative Expense Reserves	
6	LAE - Guaranty Assns	
	LAE Paid	17,768,590
	LAE Reserves	216,861
Policy Claims - Class 2		
7	Loss Claims - Guaranty Assns	
	Loss Claims Paid	74,127,140
	Loss Claims Reserves	330,735
8	Loss Claims - Other	
	Other Loss Claims Paid	281,505
	Other Loss Claims Reserves	82,519,187
9	LAE - Other	
10	Unearned & Advance Premium Claims - GA	18,541,337
11	Unearned & Advance Premium Claims - Other	2,958,904
Other Liabilities		
12	Class 3 Claims	
13	Class 4 Claims	
14	Class 5 General Unsecured Creditor Claims	37,180,981
15	Class 5 Reinsurance Related Unsecured Claims	
16	Class 6 Claims	78,676
17	Class 7 Claims	
18	Class 8 Claims	
19	Class 9 Claims	
20	Class 10 Interest	
21	Class 11 Claims	
22	Other Liabilities	
	Funds Held in Trust for Others-Allianz	
	Funds Held-Premium Collected on Cancelled Policies	271
	Non Filed POCs for pre Receivership Liabilities	144,420,639
	Total Liabilities	408,560,015
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over Liabilities	(176,991,815)
	Total Liabilities & Equity	231,568,200

EXHIBIT 2

ACCESS INSURANCE COMPANY IN RECEIVERSHIP
 EARLY ACCESS CALCULATION - GA ADMIN, LAE EXP AND LOSS CLAIMS PAID
 AS OF SEPTEMBER 30, 2025

		(A)			(B)	
<u>State</u>	<u>Approved POC Letter Date</u>	<u>Approved Class 1 IGA</u>		<u>Approved Class 2</u>	<u>Early Access Amounts</u>	<u>Recommended Early Access Payments (A) - (B)</u>
		<u>POC Through</u>	<u>IGA POC Through</u>			
		<u>September 30, 2025</u>	<u>September 30, 2025</u>	<u>September 30, 2025</u>	<u>Previously Paid</u>	
				<u>Total Approved POCs</u>		
				<u>Through September</u>		
				<u>30, 2025</u>		
AL	20250405	\$2,560,692.30		\$3,106,208.41	\$5,661,371.60	\$5,529.11
AR	20250106	\$18,034.94		\$2,628.59	\$20,663.53	\$0.00
AZ	20250428	\$49,349.45		\$87,918.97	\$136,566.80	\$701.62
CA	20250405	\$36,803,622.53		\$73,572,075.18	\$109,530,008.43	\$845,689.28
GA	20250523	\$860,427.93		\$785,429.81	\$1,623,707.79	\$22,149.95
IN	20250424	\$14,961.46			\$14,961.46	\$0.00
LA	20250424	\$130,981.65		\$241,170.46	\$370,136.42	\$2,015.69
MS	20250527	\$111,347.97		\$28,003.01	\$139,350.98	\$0.00
NV	20250405	\$59,590.67		\$8,547.00	\$68,137.67	\$0.00
OK	20250501	\$46,441.27		\$148,212.55	\$188,375.56	\$6,278.26
PA	20250501	\$5,855,757.74		\$10,841,862.91	\$15,016,083.64	\$1,681,537.01
SC	20250405	\$1,928,075.52		\$4,151,549.72	\$5,923,838.59	\$155,786.65
TN	20250405	\$48,769.07		\$12,680.19	\$61,449.26	\$0.00
TX	20250405	\$18,385.06		\$452.50	\$16,544.11	\$2,293.45
Totals		\$48,506,437.56	\$92,986,739.30	\$141,493,176.86	\$138,771,195.84	\$2,721,981.02

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Greg Pierce on behalf of Greg Pierce

Bar No. 15994250

gpierce@gpiercelaw.com

Envelope ID: 107808457

Filing Code Description: Motion (No Fee)

Filing Description: APPLICATION TO APPROVE FIFTH EARLY ACCESS DISTRIBUTION

Status as of 11/10/2025 3:16 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Name	BarNumber	Email	TimestampSubmitted	Status
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Associated Case Party: TEXAS DEPARTMENT OF INSURANCE

Name	BarNumber	Email	TimestampSubmitted	Status
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