

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 <sup>ST</sup> JUDICIAL DISTRICT

**SPECIAL DEPUTY RECEIVER'S QUARTERLY FINANCIAL REPORT AND**  
**SUMMARY STATEMENT OF EXPENSES**  
**(SEPTEMBER 1, 2025 THROUGH NOVEMBER 30, 2025)**

TO THE HONORABLE DISTRICT COURT:

CANTILO & BENNETT, L.L.P., solely in its capacity as the Special Deputy Receiver of Access Insurance Company (the “SDR” and “Access” respectively), files this Financial Report and Summary Statement of Expenses of the receivership estate for the period of September 1, 2025 to November 30, 2025. The attached report is filed pursuant to TEX. INS. CODE ANN., §§ 443.015(g) and 443.016(a) and the Court’s Order Granting the SDR’s Second Supplement to Application for Approval of Fees and Expenses, entered on May 28, 2020.

The Special Deputy Receiver has served this Quarterly Financial Report to all known parties at interest, as shown in the certificate of service.

Respectfully submitted,

/s/ Greg Pierce  
Gregory A. Pierce  
State Bar No. 15994250  
P.O. Box 40  
Austin, Texas 78767  
Tel: (512) 474-2154  
[gpierce@gpiercelaw.com](mailto:gpierce@gpiercelaw.com)

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

## CERTIFICATE OF SERVICE

I certify that on December 15, 2025, a true and correct copy of this SPECIAL DEPUTY RECEIVER'S QUARTERLY FINANCIAL REPORT AND SUMMARY STATEMENT OF EXPENSES (SEPTEMBER 1, 2025 TO NOVEMBER 30, 2025) was served pursuant to the Order of Reference, Texas Rules of Civil Procedure, TEX. INS. CODE ANN. SEC. 443.007(d) and the Court's order on electronic service on the following by email, except as specifically otherwise noted.

*Via Email:* [specialmasterclerk@tdi.texas.gov](mailto:specialmasterclerk@tdi.texas.gov)

Tom Collins, Receivership Master  
c/o Special Master's Clerk  
RLO MC-FRD  
PO Box 12030  
Austin, TX 78711-2030

*Via e-Service:* [Shawn.Martin@tdi.texas.gov](mailto:Shawn.Martin@tdi.texas.gov)

Shawn Martin  
TEXAS DEPARTMENT OF INSURANCE  
RLO MC-FRD  
PO Box 12030  
Austin, TX 78711-2030

*Via Email:* [David.Carbajal@tdi.texas.gov](mailto:David.Carbajal@tdi.texas.gov)

David Carbajal  
TEXAS DEPARTMENT OF INSURANCE  
RLO MC-FRD  
PO Box 12030  
Austin, TX 78711-2030

*Via Email:* [Vane.Hugo@tdi.texas.gov](mailto:Vane.Hugo@tdi.texas.gov)

Vane Hugo  
TEXAS DEPARTMENT OF INSURANCE  
RLO MC-FRD  
PO Box 12030  
Austin, TX 78711-2030

*Via e-Service:* [Kimberly.Gdula@oag.texas.gov](mailto:Kimberly.Gdula@oag.texas.gov)

Kimberly Gdula  
Assistant Attorney General  
General Litigation Division  
OFFICE OF THE TEXAS ATTORNEY GENERAL  
P.O. Box 12548, Mail Stop 01901  
Austin, TX 78711-2548  
*Counsel for Texas Department of Insurance*

*Via e-Service:* [bburner@mwlaw.com](mailto:bburner@mwlaw.com)

Burnie Burner  
MITCHELL, WILLIAMS, SELIG, GATES &  
WOODYARD, PLLC  
500 W. 5th Street Suite 1150  
Austin, TX 78701  
*Counsel for Defendant  
Access Insurance Company*

*Via Email:* [aiga01@bellsouth.net](mailto:aiga01@bellsouth.net)

Andrea Lentine  
Executive Director  
ALABAMA INSURANCE GUARANTY  
ASSOCIATION  
2020 Canyon Road, Suite 200  
Birmingham, AL 35216

*Via Email:* [guarantyfunds@difi.az.gov](mailto:guarantyfunds@difi.az.gov)

ARIZONA PROPERTY & CASUALTY  
GUARANTY FUND  
100 North 15 Avenue, Suite 261  
Phoenix, AZ 85007-2624

*Via Email:* [AMinor@arkansas.gov](mailto:AMinor@arkansas.gov)

Amanda Minor  
ARKANSAS PROPERTY & CASUALTY  
GUARANTY FUND  
1023 W. Capitol Avenue, Suite 2  
Little Rock, AR 72201

*Via Email:* [RoeberB@caiga.org](mailto:RoeberB@caiga.org)

Brad Roeber, Executive Director  
CALIFORNIA INSURANCE GUARANTEE  
ASSOCIATION  
PO Box 29066  
Glendale, CA 91209-9066

*Via Email:* [stbrown@agfgroup.org](mailto:stbrown@agfgroup.org)  
*Via Email:* [bricker@agfgroup.org](mailto:bricker@agfgroup.org)  
Steve Brown, Chief Operating Officer  
Bob Ricker, Executive Director  
FLORIDA INSURANCE GUARANTY ASSOCIATION  
PO Box 15159  
Tallahassee, FL 32317

*Via Email:* [abarbera@quadassoc.org](mailto:abarbera@quadassoc.org)  
Amanda Barbera  
Executive Director  
INDIANA INSURANCE GUARANTY ASSOCIATION  
3502 Woodview Trace, Suite 100  
Indianapolis, IN 46268

*Via Email:* [blaw@gfms.org](mailto:blaw@gfms.org)  
Barbara Peterson law  
President  
GUARANTY FUND MANAGEMENT SERVICES  
One Bowdoin Square  
Boston, MA 02114-2916

*Via Email:* [BGilbert@niga-pc.org](mailto:BGilbert@niga-pc.org)  
Bruce W. Gilbert  
Executive Director  
NEVADA INSURANCE GUARANTY ASSOCIATION  
3821 West Charleston Boulevard, Suite 100  
Las Vegas, NV 89102-1859

*Via Email:* [JCannon@opciga.org](mailto:JCannon@opciga.org)  
Jessica Cannon  
OKLAHOMA PROPERTY & CASUALTY  
INSURANCE GUARANTY ASSOCIATION  
2601 Northwest Expressway, Suite 330E  
Oklahoma City, OK 73112

*Via Email:* [smitty@scwind.com](mailto:smitty@scwind.com)  
J. Smith Harrison  
Executive Director/Secretary  
SOUTH CAROLINA PROPERTY & CASUALTY  
INSURANCE GUARANTY ASSOCIATION  
PO Box 407  
Columbia, SC 29202

*Via Email:* [fknighton@gaiga.org](mailto:fknighton@gaiga.org)  
Frank Knighton  
Executive Director  
GEORGIA INSURERS INSOLVENCY POOL  
3700 Crestwood Parkway NW, Suite 400  
Duluth, GA 30096

*Via Email:* [JWells@laiga.org](mailto:JWells@laiga.org)  
John Wells  
Executive Director  
LOUISIANA INSURANCE GUARANTY ASSOCIATION  
2142 Quail Run Drive  
Baton Rouge, LA 70808-4126

*Via Email:* [arussell@msiga.net](mailto:arussell@msiga.net)  
Arthur Russell  
Executive Director  
MISSISSIPPI INSURANCE GUARANTY ASSOCIATION  
713 South Pear Orchard Road, Suite 200  
Ridgeland, MS 39157-4823

*Via Email:* [debbiel@integriongroup.com](mailto:debbiel@integriongroup.com)  
Debbie Luera  
Director of Operations  
NEW MEXICO INSURANCE GUARANTY  
ASSOCIATION - Integrion Group, Inc.  
PO Box 27815  
Albuquerque, NM 87125

*Via Email:* [rbauso@ppciga.org](mailto:rbauso@ppciga.org)  
Raymond Bauso, Executive Director  
PENNSYLVANIA PROPERTY & CASUALTY  
INSURANCE GUARANTY ASSOCIATION  
One Penn Center, Suite 1850  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103

*Via Email:* [lbrouse@tiga.net](mailto:lbrouse@tiga.net)  
*Via Email:* [knations@tiga.net](mailto:knations@tiga.net)  
Lorrie Brouse, Executive Secretary  
Kerry Nations, Plan Administrator  
TENNESSEE INSURANCE GUARANTY ASSOCIATION  
3100 West End Ave., Suite 670  
Nashville, TN 37203-5805

*Via Email:* [rstroud@tpciga.org](mailto:rstroud@tpciga.org)  
*Via Email:* [slang@tpciga.org](mailto:slang@tpciga.org)  
Rachel Stroud, & Sara Lang  
TEXAS PROPERTY CASUALTY INSURANCE  
GUARANTY ASSOCIATION (TPCIGA)  
8911 N. Capital of Texas Hwy, Ste 2200  
Austin, TX 78759

*Via Email:* [mtsutsui@tpciga.org](mailto:mtsutsui@tpciga.org)  
Mark Tsutsui, Executive Director  
TEXAS PROPERTY AND CASUALTY INSURANCE  
GUARANTY ASSOCIATION (TPCIGA)  
8911 N. Capital of Texas Hwy, Ste 2200  
Austin, TX 78759

*Via Email:* [jdamato@tpciga.org](mailto:jdamato@tpciga.org)  
John J. D'Amato, CPA, Chief Financial Officer  
TEXAS PROPERTY AND CASUALTY INSURANCE  
GUARANTY ASSOCIATION (TPCIGA)  
8911 N. Capital of Texas Hwy, Ste 2200  
Austin, TX 78759

*Via Email:* [aevans@tpciga.org](mailto:aevans@tpciga.org)  
Annette Evans, Claims Director  
TEXAS PROPERTY AND CASUALTY INSURANCE  
GUARANTY ASSOCIATION (TPCIGA)  
8911 N. Capital of Texas Hwy, Ste 2200  
Austin, TX 78759

*Via Email:* [Wallock.Michael@aaa-calif.com](mailto:Wallock.Michael@aaa-calif.com)  
Mike Wallock  
Office of the General Counsel  
AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA  
3333 Fairview Rd., A-451  
Costa Mesa, CA 92626

*Via Email:* [Young.Courtney@aaa-calif.com](mailto:Young.Courtney@aaa-calif.com)  
Courtney Young  
Office of the General Counsel  
AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA  
3333 Fairview Rd., A-451  
Costa Mesa, CA 92626

*Via Email:* [Stanley.jason@aaa-texas.com](mailto:Stanley.jason@aaa-texas.com)  
Jason Stanley  
Subrogation Claims Team Manager  
AAA TEXAS  
Dallas, TX

*Via Email:* [sternisha.andrew@aaa-texas.com](mailto:sternisha.andrew@aaa-texas.com)  
Andrew Sternisha  
Subrogation Analyst  
AAA Texas  
Dallas, Texas

*Via First Class Mail*  
INTERNAL REVENUE SERVICE  
Special Procedures Branch  
300 East 8th Street, Suite 352  
Mail Stop 5026AUS  
Austin, TX 78701

*Via e-Service:* [anthony@icenoglefirm.com](mailto:anthony@icenoglefirm.com)  
Anthony Icenogle  
ICENOGL & BOGGINS, P.L.L.C.  
6805 N. Capital of Texas Hwy., Ste 220  
Austin, TX 78731  
*Attorneys for Allianz Risk Transfer AG (Bermuda Branch)*

*Via e-Service:* [Elliott.Kroll@arentfox.com](mailto:Elliott.Kroll@arentfox.com)  
Elliott Kroll  
ARENT FOX, LLP  
1301 Avenue of the Americas, Floor 42  
New York, NY 10019  
*Attorneys for Allianz Risk Transfer AG  
(Bermuda Branch)*

/s/ Greg Pierce  
Gregory A. Pierce

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**Access Insurance Co  
Statement of Expenses**

**For Period Ending  
11/30/25**

	<b>Total Sep</b>	<b>Total Oct</b>	<b>Total Nov</b>	<b>Total Quarter</b>
<b>SDR</b>				
Cantilo & Bennett, LLP				
Partner/Attorney/	8,234.50	12,728.00	8,428.00	29,390.50
Partner/Attorney Travel	0.00	0.00	53.75	53.75
Associate	0.00	0.00	496.00	496.00
Receivership Specialist/	91.00	52.00	143.00	286.00
Expenses	16.46	26.02	7.40	49.88
<b>Total SDR Billing</b>	<b>8,341.96</b>	<b>12,806.02</b>	<b>9,128.15</b>	<b>30,276.13</b>
<b>SDR Subcontractors - Legal</b>				
Inquest Resources				
Paralegal	200.00	416.00	104.00	720.00
Receivership Specialist	328.00	352.00	256.00	936.00
Litigation Assistant/Records Mgr	585.00	170.00	220.00	975.00
Expenses	3.37	0.00	7.56	10.93
<b>Total Billing</b>	<b>1,116.37</b>	<b>938.00</b>	<b>587.56</b>	<b>2,641.93</b>
Greg Pierce-Attorney at Law				
Attorney	616.00	4,334.00	3,454.00	8,404.00
Expenses	4.24	8.48	4.24	16.96
<b>Total Billing</b>	<b>620.24</b>	<b>4,342.48</b>	<b>3,458.24</b>	<b>8,420.96</b>
<b>Total Legal Subcontractors</b>	<b>1,736.61</b>	<b>5,280.48</b>	<b>4,045.80</b>	<b>11,062.89</b>
<b>SDR Subcontractors - Other</b>				
Petrosewicz & Company, Inc				
Accountant-Principal/	1,558.00	2,812.00	931.00	5,301.00
Accountant	2,970.00	1,430.00	1,771.00	6,171.00
Accountant	88.00	22.00	0.00	110.00
Expenses	78.78	91.40	73.13	243.31
<b>Total Billing</b>	<b>4,694.78</b>	<b>4,355.40</b>	<b>2,775.13</b>	<b>11,825.31</b>
EMKAY Associates				
Claims Manager/	50.00	330.00	80.00	460.00
Claims Representative/	2,223.00	2,367.00	1,872.00	6,462.00
Claims Representative	931.00	1,568.00	371.00	2,870.00
Claims Representative Travel	84.00	42.00	42.00	168.00
Expenses	61.60	87.80	30.80	180.20
<b>Total Billing</b>	<b>4,375.60</b>	<b>5,465.80</b>	<b>2,395.80</b>	<b>12,237.20</b>
Brandon Murray				
Claims Representative	0.00	408.00	603.50	1,011.50
Expenses	0.00	0.00	0.00	0.00
<b>Total Billing</b>	<b>0.00</b>	<b>408.00</b>	<b>603.50</b>	<b>1,011.50</b>

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**Access Insurance Co  
Statement of Expenses**

**For Period Ending  
11/30/25**

	<b>Total Sep</b>	<b>Total Oct</b>	<b>Total Nov</b>	<b>Total Quarter</b>
Culmination Consulting Group-Reinsurance/Litigation Expert				
Reinsurance Consultant	3,802.50	4,972.50	3,960.00	12,735.00
IT/Data Base Admin	1,128.50	795.50	1,535.50	3,459.50
Expenses	0.00	0.00	0.00	0.00
	<b>4,931.00</b>	<b>5,768.00</b>	<b>5,495.50</b>	<b>16,194.50</b>
<b>Total Other SDR Subcontractors</b>	<b>14,001.38</b>	<b>15,997.20</b>	<b>11,269.93</b>	<b>41,268.51</b>
<b>Receivership Service Providers</b>				
US Postal Service Box fees 6 Months	0.00	305.00	0.00	305.00
SafeSite	415.20	415.20	415.20	1,245.60
Answer National	127.49	140.59	117.70	385.78
Network 1 Consulting	3,994.15	4,478.98	4,745.35	13,218.48
Vertafore	936.45	936.45	936.45	2,809.35
Vertafore Consulting-Use of Image-Right	0.00	1,500.00	0.00	1,500.00
Derek Massey-Travel Reimbursement for Mail Pick up	52.40	52.40	42.00	146.80
Operating Account Bank Fees-Frost	15.15	15.15	15.30	45.60
Texas Treasury Unrestricted Account - Management Fees	1,029.00	999.63	1,035.72	3,064.35
<b>Total Other</b>	<b>6,569.84</b>	<b>8,843.40</b>	<b>7,307.72</b>	<b>22,720.96</b>
<b>Sub-Total SDR, Subcontractor &amp; Provider Expenses</b>				
<b>Sub-Total SDR, Subcontractor &amp; Provider Expenses</b>	<b>30,649.79</b>	<b>42,927.10</b>	<b>31,751.60</b>	<b>105,328.49</b>
<b>Liquidation Oversight Allocation</b>				
RLO Allocation	3,047.30	3,015.77	2,820.55	8,883.62
Special Master's Fees	15.56	193.33	0.00	208.89
<b>Total RLO &amp; SM Expense</b>	<b>3,062.86</b>	<b>3,209.10</b>	<b>2,820.55</b>	<b>9,092.51</b>
<b>Total Expenses</b>	<b>33,712.65</b>	<b>46,136.20</b>	<b>34,572.15</b>	<b>114,421.00</b>

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**Access Insurance Co**  
**Statement of Net Assets**

**For the Period Ending**  
**11/30/2025**

Line		11/30/25
<b>Cash</b>		
1	Cash	
	Cash - Unrestricted	60,632,280
	APF Funds (Loan proceeds)	
<b>Investments</b>		
2	Short-Term Investments	
3	Bonds	
4	Stocks - Preferred & Common	
5	Investments in Subsidiaries, Controlled or Affiliated Entities	
6	Mortgage Loans	
7	Real Estate	
8	Policy Loans	
9	Other Invested Assets	
<b>Restricted Assets</b>		
10	Statutory Deposits	
11	Funds held by or deposited with Reinsured Companies	
12	Restricted - Other	
	Funds Held in Trust for Others-Allianz	
	Funds Held-Premium Collected on Cancelled Policies	271
<b>Reinsurance Receivable</b>		
13	Reinsurance Recoverables on Paid Losses & LAE (net of allowance)	
14	Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)	7,520,223
15	Reinsurance Recoverables on UEP & Contingent Commissions	
<b>Other Receivables</b>		
16	Salvage & Subrogation Recoveries	
17	Premiums Due from Agents & Policyholders	
18	Receivable from Parents, Subsidiaries & Affiliates	
19	Receivable from Guaranty Associations - Early Access Payments	138,771,196
20	Other Receivables	
	Income and Premium Tax Receivable	96,451
<b>Other Assets</b>		
21	FF&E	
22	Other Assets	
	<b>Total Assets</b>	<b>207,020,421</b>

**NOTES**

Ref No.

**Access Insurance Co**  
**Changes in Net Assets for the Quarter Ending**

11/30/25

Line		08/31/25	11/30/25	Change
<b>Cash</b>				
1	Cash			
	Cash - Unrestricted	60,120,626	60,632,280	511,654
	APF Funds (Loan proceeds)	0	0	0
<b>Investments</b>				
2	Short-Term Investments	0	0	0
3	Bonds	0	0	0
4	Stocks - Preferred & Common	0	0	0
5	Investments in Subsidiaries, Controlled or Affiliated Entities	0	0	0
6	Mortgage Loans	0	0	0
7	Real Estate	0	0	0
8	Policy Loans	0	0	0
9	Other Invested Assets	0	0	0
<b>Restricted Assets</b>				
10	Statutory Deposits	0	0	0
11	Funds held by or deposited with Reinsured Companies	0	0	0
12	Restricted - Other	0	0	0
	Collateral Assignment - Suntrust Bank Certificate of Deposit	0	0	0
	Funds Held in Trust for Others-Allianz & Partner Re	0	0	0
	Premiums Paid-Held for Others	271	271	0
<b>Reinsurance Receivable</b>				
13	Reinsurance Recoverables on Paid Losses & LAE (net of allowance)	0	0	0
14	Reinsurance Recoverables on Unpaid Losses & LAE (net of allowance)	32,413,228	7,520,223	(24,893,005)
15	Reinsurance Recoverables on UEP & Contingent Commissions	0	0	0
<b>Other Receivables</b>				
16	Salvage & Subrogation Recoveries	0	0	0
17	Premiums Due from Agents & Policyholders	0	0	0
18	Receivable from Parents, Subsidiaries & Affiliates	0	0	0
19	Receivable from Guaranty Associations - Early Access Payments	138,771,196	138,771,196	0
20	Other Receivables	0	0	0
	Income and Premium Tax Receivable	96,451	96,451	0
		0	0	0
	Litigation Receivable	0	0	0
<b>Other Assets</b>				
21	FF&E	0	0	0
22	Other Assets	0	0	0
<b>Total Assets</b>				
		231,401,772	207,020,421	(24,381,351)

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**Access Insurance Co  
Statement of Net Liabilities**

**For Period Ending  
11/30/25**

Line

11/30/25

1	Secured Claims	
2	APF Loan	
3	Special Deposit Claims	
<b>Administrative Claims - Class 1</b>		
4	Administrative Claims - State/Receiver	
	Special Deputy Receiver, Subcontractors Fees & Expenses	51,440
	Liquidation Oversight	2,821
	Special Master's Fees	
5	Administrative Claims - Guaranty Assns	
	Administrative Expense Paid	30,102,576
	Administrative Expense Reserves	410,925
6	LAE - Guaranty Assns	
	LAE Paid	17,776,665
	LAE Reserves	216,271
<b>Policy Claims - Class 2</b>		
7	Loss Claims - Guaranty Assns	
	Loss Claims Paid	74,127,066
	Loss Claims Reserves	318,336
8	Loss Claims - Other	
	Other Loss Claims Paid	281,668
	Other Loss Claims Reserves	19,298,175
9	LAE - Other	
10	Unearned & Advance Premium Claims - GA	18,541,337
11	Unearned & Advance Premium Claims - Other	2,958,904
<b>Other Liabilities</b>		
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
	<b>Total Liabilities</b>	345,766,751
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over Liabilities	(138,746,330)
	<b>Total Liabilities &amp; Equity</b>	207,020,421

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**Access Insurance Co  
Statement of Net Liabilities**

**For Period Ending  
11/30/25**

**NOTES**

Ref. No.

Included in the Special Deputy Receiver, Subcontractors Fees & Expense line is \$38,765 of post receivership attorneys' fees and expenses incurred by pre-receivership defense counsel to enforce the automatic stay and provide notice of the receivership. The claims were submitted as part of the law firms' POCs and will be paid when the SDR makes the distribution in this estate.

Other Loss Claims Paid represents SDR approved class 2 proof of claims of \$181,474 and approved deemed deductible claims of \$100,194.

Other Loss Claims Reserves reflect a liability based on the June 30, 2025 Davies Actuarial firm's (p/k/a Merlino & Associates, Inc.) "Loss and Loss Expense Report" dated November 19, 2025 with monthly adjustments for amounts obtained by the various state guaranty associations.

22 Non Filed POCs for Pre Receivership Liabilities

Ceded Reinsurance Premium Payable	117,456,621
Provision for Reinsurance	10,955,670
Commissions Payable	9,889,444
Taxes, Licenses, Fees	4,627,439
Other Liabilities	664,019
Taxing Authorities	827,446
Totals	<u>144,420,639</u>

**Access Insurance Co**  
**Changes in Net Liabilities for the Quarter Ending**

11/30/25

Line		08/31/25	11/30/25	Change
1	Secured Claims	0	0	0
2	APF Loan	0	0	0
3	Special Deposit Claims	0	0	0
<b>Administrative Claims - Class 1</b>				
4	Administrative Claims - State/Receiver	0	0	0
	Special Deputy Receiver, Subcontractors Fees & Expenses	55,918	51,440	(4,478)
	Liquidation Oversight	4,156	2,821	(1,335)
	Special Master's Fees	38	0	(38)
5	Administrative Claims - Guaranty Assns	0	0	0
	Administrative Expense Paid	30,029,988	30,102,576	72,588
	Administrative Expense Reserves	0	410,925	410,925
6	LAE - Guaranty Assns	0	0	0
	LAE Paid	17,766,068	17,776,665	10,597
	LAE Reserves	222,456	216,271	(6,185)
<b>Policy Claims - Class 2</b>				
7	Loss Claims - Guaranty Assns	0	0	0
	Loss Claims Paid	74,111,579	74,127,066	15,487
	Loss Claims Reserves	346,370	318,336	(28,034)
8	Loss Claims - Other	0	0	0
	Other Loss Claims Paid	281,207	281,668	461
	Other Loss Claims Reserves	82,519,044	19,298,175	(63,220,869)
9	LAE - Other	0	0	0
10	Unearned & Advance Premium Claims - GA	18,541,335	18,541,337	2
11	Unearned & Advance Premium Claims - Other	2,958,907	2,958,904	(3)
<b>Other Liabilities</b>				
12	Class 3 Claims	0	0	0
13	Class 4 Claims	0	0	0
14	Class 5 General Unsecured Creditor Claims	37,180,981	37,180,981	0
15	Class 5 Reinsurance Related Unsecured Claims	0	0	0
16	Class 6 Claims	78,676	78,676	0
17	Class 7 Claims	0	0	0
18	Class 8 Claims	0	0	0
19	Class 9 Claims	0	0	0
20	Class 10 Interest	0	0	0
21	Class 11 Claims	0	0	0
22	Other Liabilities	0	0	0
	Funds Held in Trust for Others-Allianz & Partner Re	0	0	0
	Funds Held-Premium Collected on Cancelled Policies	271	271	0
	Non Filed POCs for pre Receivership Liabilities	144,420,639	144,420,639	0
<b>Total Liabilities</b>		408,517,633	345,766,751	(62,750,882)
23	Total Equity/(Deficit) Excess (Deficiency) of Assets over Liabilities	(177,115,861)	(138,746,330)	38,369,531
<b>Total Liabilities &amp; Equity</b>		231,401,772	207,020,421	(24,381,351)

**Access Insurance Co**  
**Sources & Uses of Cash**

For Period Ending  
11/30/25

	Qtr Ending Nov-25
<b>Income</b>	
Premium Receipts	0
Agents' Balances Received	0
Reinsurance Recoveries	8,608
Salvage & Subrogation Recoveries	137
Affiliates Recovery	0
Settlement/Litigation Recovery	2,323
Other Receipts	0
Sale of Real & Personal Property	0
Investment Sales/Receipts	0
Other Asset Receipts	0
<b>Total Receipts from Assets/Receivables</b>	<b>11,068</b>
Interest & Dividend Receipts, EA Interest	0
Cash Deposit Interest	620,857
<b>Total Cash Receipts</b>	<b>631,925</b>
<b>Disbursements</b>	
SDR Fees & Expenses	32,439
Subcontractor Legal Fees & Expenses	9,539
Subcontractor Other Fees & Expenses	42,286
Non-Subcontractor Fees & Expenses	0
Other Expenses	22,720
RLO Fees & Expenses	13,287
<b>Total Disbursements for Operations</b>	<b>120,271</b>
Loss Claims & LAE Expense Payments	0
Early Access Payments - GA Repayments	0
Refunds & Other Distributions - Wire Transfer received in error	0
<b>Total Cash Distributions</b>	<b>0</b>
<b>Total Cash Disbursements &amp; Distributions</b>	<b>120,271</b>
<b>Net Increase(Decrease) in Cash</b>	<b>511,654</b>
<b>Cash at Beginning of Period</b>	<b>60,120,626</b>
<b>Cash at End of Period</b>	<b>60,632,280</b>

### Automated Certificate of eService

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Greg Pierce on behalf of Greg Pierce

Bar No. 15994250

gpierce@gpierceclaw.com

Envelope ID: 109123620

Filing Code Description: No Fee Documents

Filing Description: SPECIAL DEPUTY RECEIVER'S QUARTERLY FINANCIAL REPORT AND SUMMARY STATEMENT OF EXPENSES(September 1, 2025 THROUGH November 30, 2025)

Status as of 12/16/2025 7:59 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brian Falligant		bfalligant@inquestresources.com	12/15/2025 4:53:38 PM	SENT
Special Masters Clerk Special Masters Clerk		specialmasterclerk@tdi.texas.gov	12/15/2025 4:53:38 PM	SENT
Melvin Burner	3425700	bburner@mwlaw.com	12/15/2025 4:53:38 PM	SENT
Anthony Icenogle	10382948	anthony@icenoglefirm.com	12/15/2025 4:53:38 PM	SENT
Patricia Muniz		pmuniz@inquestresources.com	12/15/2025 4:53:38 PM	SENT
Marvin Kelly		mkelly@tpciga.org	12/15/2025 4:53:38 PM	SENT
David Broemel		dbroemel@bakerdonelson.com	12/15/2025 4:53:38 PM	ERROR

Associated Case Party: TEXAS DEPARTMENT OF INSURANCE

Name	BarNumber	Email	TimestampSubmitted	Status
Kimberly Gdula	24052209	kimberly.gdula@oag.texas.gov	12/15/2025 4:53:38 PM	SENT

Associated Case Party: TPCIGA

Name	BarNumber	Email	TimestampSubmitted	Status
Rachel Stroud		rstroud@tpciga.org	12/15/2025 4:53:38 PM	SENT