

BEFORE ALLAN L. MCVEY, INSURANCE COMMISSIONER
OF THE STATE OF WEST VIRGINIA

In the Matter of:

MUNICIPAL MUTUAL INSURANCE COMPANY

Administrative Proceeding No. 25-IC-179314

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER ADOPTING
REPORT OF MARKET CONDUCT EXAMINATION

NOW COMES, Allan L. McVey, Insurance Commissioner of the State of West Virginia (hereinafter, “Commissioner”), who, after consideration of the *Report of Market Conduct Examination* (hereinafter, the “*Examination Report*”) of Municipal Mutual Insurance Company (hereinafter, “Municipal Mutual”) for the examination period ending December 31, 2024, made the following findings of fact and conclusions of law and order.

FINDINGS OF FACT

1. The market conduct examination was a comprehensive examination focusing on standards contained in the *Market Regulation Handbook*. The examination was conducted in accordance with W. Va. Code §33-2-9(c) by examiners duly appointed by the Commissioner and covered the period of January 1, 2022 through December 31, 2024.

2. On or about October 27, 2025, the examiner filed with the Commissioner, pursuant to W. Va. Code §33-2-9, the *Examination Report*.

3. A true copy of the *Examination Report* was provided to Municipal Mutual and Municipal Mutual was notified, pursuant to W.Va. Code §33-2-9(j)(2), that it had ten (10) days after receipt of the *Examination Report* to file a submission or rebuttal with the Commissioner.

4. As set forth in the *Examination Report*, the examination focused on the methods used by Municipal Mutual to manage its operations for each of the areas examined, including whether and how Municipal Mutual complies with West Virginia's statutory and regulatory law.

5. The exam did not discover any instances where Municipal Mutual was non-compliant with West Virginia law.

6. The Commissioner reviewed the *Examination Report* and considered Municipal Mutual submissions prior to issuing these findings of fact, conclusions of law and order.

CONCLUSIONS OF LAW

1. The Commissioner has jurisdiction over the subject matter and the parties to this proceeding.

2. This proceeding is conducted pursuant to and in accordance with W. Va. Code §33-2-9.

3. The Commissioner is charged with the responsibility of verifying Municipal Mutual's continued compliance with West Virginia law.


4. As detailed in the *Examination Report*, Municipal Mutual was compliant with all twenty-four (24) standards reviewed.

ORDER

Pursuant to W.Va. Code §33-2-9(j)(3)(A), following the review of the *Examination Report*, the examination work papers, and Municipal Mutual's response thereto, it is **ORDERED** as follows:

1. The referenced and attached *Examination Report* is hereby **ADOPTED** and **APPROVED** and by this reference, incorporated herein and made a part hereof; and
2. Municipal Mutual shall continue to monitor its compliance with applicable West Virginia law.

Entered this 5th day of December, 2025.



Allan L. McVey
CPCU, ARM, AAI, AAM, AIS
Insurance Commissioner

Report of Market Conduct Examination

As of December 31, 2024



Municipal Mutual Insurance Company

PO Box 310
Wellsburg, WV 26070

NAIC COMPANY CODE 14656
Examination Number 25-IC-179314

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October 27, 2025

The Honorable Allan L. McVey, CPCU, ARM, AAI, AAM, AIS
West Virginia Insurance Commissioner
900 Pennsylvania Avenue
Charleston, West Virginia 25302

Dear Commissioner McVey:

Pursuant to your instructions and in accordance with *W.Va. Code §33-2-9*, an examination has been made as of December 31, 2024, regarding the business affairs of:

Municipal Mutual Insurance Company of West Virginia
PO Box 310
Wellsburg, WV 26070

Hereinafter referred to as the "Company." The following report of the findings of this examination is herewith respectfully submitted.

COMPLIANCE WITH PREVIOUS EXAMINATION RECOMMENDATIONS

The West Virginia Office of the Insurance Commissioner (“WVOIC”) previously conducted a comprehensive market conduct examination of the Company as of March 31, 2020.

The Company was found to be compliant in all areas of review for the March 31, 2020 examination and no recommendations were made.

PURPOSE AND SCOPE OF THE EXAMINATION

Market conduct examiners with the WVOIC reviewed certain business practices of the Company. The period covered by the examination was January 1, 2022 through December 31, 2024. W. Va. Code § 33-2-9 empowers the Commissioner to examine any entity engaged in the business of insurance. The findings in this report, including all work products developed in producing it, are the sole property of the WVOIC. West Virginia laws, regulations, and bulletins cited may be found at: <https://www.wvinsurance.gov/Legal-Authority>. “W.Va. Code” as used herein refers to the West Virginia Code Annotated. “W.Va. Code R.” as used herein refers to the West Virginia Code of State Rules.

The purpose of this market conduct examination was to determine the Company’s compliance with West Virginia (WV) laws and regulations. The conclusions and findings of this market conduct examination are public record.

The basic business areas that were reviewed and tested under this examination were:

- Complaint Handling
- Producer Licensing
- Policyholder Service
- Underwriting and Rating
- Claims

EXECUTIVE SUMMARY

The examination work began August 11, 2025 and concluded October 20, 2025. The entirety of the examination was done remotely, with the Company having provided examiner access to both their Docfinity imaging system which houses file notes and documentation, as well as access to their BriteCore system which retains the balance of file information. A total of twenty-four (24) standards were reviewed during this examination. Of these twenty-four (24) standards, the Company was compliant with all standards.

HISTORY AND PROFILE

Municipal Mutual Insurance Company of West Virginia was incorporated February 16, 1910, under the laws of West Virginia and commenced operations on April 1, 1910. The Company operates under the provisions of Chapter 33, Article 22 of the West Virginia Code as a Farmers’ Mutual Fire Insurance Company and is currently located in Brooke County in Wellsburg, West Virginia. In 1991, the Company

became authorized to write business in the states of Ohio and Pennsylvania. There were no predecessor organizations, and the Company is not affiliated with or a member of a group of insurers.

The Company writes complete standard fire (dwelling, mobile homeowners, farm owners and commercial coverages), homeowners, mobile homeowners, farm owners, commercial and dwelling OL&T. All policies are non-assessable ISO or AAIS filed programs. The Company is not a full-service company and as such does not compete in the same markets with the larger full-service carriers but operates in the area of property insurance not desired by the larger full-service carriers and stresses market values over replacement values. The Company inspects all properties with the majority that have a value of \$150,000 or below.

According to the NAIC 2024 Market Analysis - Market Share Report, the Company had a market share of 2.284% and \$13,907,019 in written premium for the homeowners line of business in West Virginia.

METHODOLOGY

The examination was conducted in accordance with the standards and procedures established by the National Association of Insurance Commissioners (NAIC) and WV's applicable statutes and regulations. This is a report by test of company compliance with selected Standard Elements of Review contained in the *NAIC's 2024 Market Regulation Handbook* ("Handbook") and Standards approved by the WVOIC which are based on applicable WV statutes and administrative rules, as referenced herein. Testing is based on guidelines contained in the Handbook. All tests applied are included in this report.

Tests designed to measure the level of compliance with WV's statutes, rules and regulations were applied to the files. Each area of the examination has specific elements that were tested and are listed below.

The examiners used the NAIC standards of 7% error ratio on claims tests (93% compliance rate) and 10% error ratio on all other tests (90% compliance rate) to determine whether or not an apparent pattern or practice of being compliant or non-compliant existed for any given test. Except as otherwise noted, tests were conducted via random sample taken from a given population where applicable. In the compliance table a "pass" response indicates compliance and a "fail" response indicates a failure to comply. The results of each test applied to a sample are reported separately.

ELEMENTS OF REVIEW AND STANDARDS

B1. COMPLAINT HANDLING: All complaints are recorded in the required format on the regulated entity's complaint register. (2024 NAIC Market Regulation Handbook Chapter 20, § B Standard 1)

- Is the Company recording all complaints, both directly from the consumer as well as the Commissioner's office, in a regulated complaint register? [W. Va. Code §33-11-4(10) and W. Va. Code R. §114-15-4.6]

B2. COMPLAINT HANDLING: The regulated entity has adequate complaint handling procedures in place and communicates such procedures to policyholders. (2024 NAIC Market Regulation Handbook Chapter 20, § B Standard 2)

- Does the Company have adequate complaint handling procedures in place Per W. Va. Code §33-11-4(10)?

B3. COMPLAINT HANDLING: The time frame within which the regulated entity responds to complaints is in accordance with applicable statutes, rules and regulations. (2024 NAIC Market Regulation Handbook Chapter 20, § B Standard 4)

- Is the Company responding to complaints within fifteen (15) Working days as required by W. Va. Code R. §114-14-5.2?

D1. PRODUCER LICENSING: Regulated entity records of licensed and appointed (if applicable) producers and in jurisdictions where applicable, licensed company or contracted independent adjusters agree with department of insurance records. (2024 NAIC Market Regulation Handbook Chapter 20, § D Standard 1)

- Are the Company's producer licensing/ appointment records maintained per W.Va. Code R. §114-15-4.5?
- Do the Company's producer appointment records agree with the WVOIC records?

D2. PRODUCER LICENSING: The producers are properly licensed and appointed and have appropriate continuing education (if required by state law) in the jurisdiction where the application was taken. (2024 NAIC Market Regulation Handbook Chapter 20, § D Standard 2)

- Are the producers properly appointed for business solicited in West Virginia? [W. Va. Code §33-12-3(d) and W. Va. Code §33-12-18]
- Does the Company appoint the producer within fifteen (15) days of the date the producer submits their first application to the Company? [W. Va. Code §33-12-18(b)]
- Are all applications signed by properly licensed and appointed producers? [W. Va. Code §33-12-3]

D3. PRODUCER LICENSING: Termination of producers complies with applicable standards, rules and regulations regarding notification to the producer and notification to the state, if applicable. (2024 NAIC Market Regulation Handbook Chapter 20, § D Standard 3)

- Does the Company notify the Commissioner's Office (on a form prescribed by the WVOIC) within thirty (30) days of terminating the producer's authority? [W. Va. Code §33-12-25 et seq.]
- Is the producer notified simultaneously? [W. Va. Code §33-12-25(d)]
- Does the Company notify the Commissioner's Office if the termination is for cause? [W.Va. Code §33-12-25(a)]

D4. PRODUCER LICENSING: Records of terminated producers adequately document reasons for termination. (2024 NAIC Market Regulation Handbook Chapter 20, § D Standard 5)

- Do company records document reason for producer termination? [W. Va. Code §33-12-25(a) & (b)]

E1. POLICYHOLDER SERVICE: Premium notices and billing notices are sent out with an adequate amount of advance notice. (2024 NAIC Market Regulation Handbook Chapter 20, § E Standard 1)

- Were renewal billing notices sent out in accordance with company guidelines?
- Were premium notices sent out for endorsement timely, not at policy expiration?

E2. POLICYHOLDER SERVICE: Policy issuance and insured requested cancellations are timely. (2024 NAIC Market Regulation Handbook Chapter 20, § E Standard 2)

- Was the policy issued timely?
- Were insured requested cancellations processed timely and without excessive paperwork required?

E3. POLICYHOLDER SERVICE: Unearned premiums are correctly calculated and returned to the appropriate party in a timely manner and in accordance with applicable statutes, rules and regulations. (2024 NAIC Market Regulation Handbook Chapter 20, § E Standard 7)

- Are unearned premiums calculated correctly?

F1. UNDERWRITING AND RATING: The rates charged for the policy coverage are in accordance with filed rates (if applicable) or the regulated entity's rating plan. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 1)

- Was the premium calculated correctly? [W. Va. Code §33-11-4(7)(c)]
- Were the Company's own underwriting guidelines followed for proper rating?
Note: Farmers Mutual Fire Insurance Companies are not required to file rates with the Commissioner's Office; however, rates should not be unfairly discriminatory. Deviations from established rating plans could indicate a company is engaged in unfair competitive practices.

F2. UNDERWRITING AND RATING: The Company does not permit illegal rebating, commission-cutting, or inducements. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 3)

- Was there any form of unfair discrimination found in the form of illegal rebating, commission-cutting, or other illegal inducements? [W. Va. Code §33-11-4(8)]

F3. UNDERWRITING AND RATING: The regulated entity's underwriting practices are not unfairly discriminatory. The regulated entity adheres to applicable statutes, rules and regulations, and regulated entity guidelines in the selection of risks. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 4)

- Are the Company's underwriting guidelines unfairly discriminatory in nature? Or do they conform to applicable statutes, rules and regulations? [W. Va. Code §33-11-4(7)(c)]
- Is the Company following its underwriting guidelines to ensure compliance regarding unfair discrimination?
- Any inconsistent underwriting practices?

F4. UNDERWRITING AND RATING: All forms, including policies, contracts, riders, amendments, endorsement forms and certificates are filed with the insurance department, if applicable. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 5)

- Have all the forms and endorsements been filed with the Commissioner? [W. Va. Code §33-6-8 and W. Va. Code §33-22-7(a)]

F5. UNDERWRITING AND RATING: Policies, contracts, riders, amendments and endorsements are issued or renewed accurately, timely and completely. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 6) *Policy issuance reviewed under Standard E2.*

- Are renewals and endorsements issued in the appropriate time frame, following the Company's procedures?
Note: Farmers Mutual Fire Insurance Companies are not subject to W.Va. Code §33-17A-4 (c); however, they are subject to W.Va. Code §33-11-4. Consistently following company procedures is the fundamental technique used to avoid unfair trade practices.

F6. UNDERWRITING AND RATING: Rejections and declinations are not unfairly discriminatory. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 7)

- Does the Company provide valid reasons for rejection/declinations when required?
- Does the Company unfairly discriminate when rejecting or declining policies?
Note: Farm Mutual Fire Insurance Companies are not subject to W.Va. Code §33-17A-4 or W.Va. Code §33-17A-6; however, they are subject to W.Va. Code §33-11-4(7)(c).

F7. UNDERWRITING AND RATING: Cancellation/non-renewal, discontinuance and declination notices comply with policy and contract provisions, state laws and company guidelines. (2024 NAIC Market Regulation Handbook Chapter 20, § F Standard 8)

- Were company-initiated cancellations and non-renewals within applicable statutes and policy provisions? [W.Va. Code §33-22-15]
- Was written cancellation notice given to the policyholder? [W.Va. Code §33-22-14]

G1. CLAIMS: Initial contact by the regulated entity with the claimant is within the required time frame. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 1)

- Was the claimant contacted within 15 working days (or mandated emergency order timeframe) from the date of the loss notice required by W.Va. Code § 33-11-4(9)(b) and W. Va. Code R. § 114-14-5.1?

G2. CLAIMS: Timely investigations are conducted. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 2)

- Did the investigation commence within fifteen (15) working days of any claim filed as required by W. Va. Code § 33-11-4(9)(c) and W. Va. Code R. § 114-14-6.2.a?
- Did the investigation continue more than 30 calendar days? If so, was a notice of necessary delay sent within 15 working days after the 30 calendar days AND if the investigation continued, were subsequent notices of necessary delay sent with 45 calendar days as required by W. Va. Code R. § 114-14-6.7?

G3. CLAIMS: Claims are resolved in a timely manner. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 3)

- Did the Company affirm or deny coverage of claims within a reasonable time after proof of loss statements have been completed as required by W. Va. Code § 33-11-4(9)(e)?
- Did the Company deny the claim or make an offer within ten (10) working days of completing its investigation as required by W. Va. Code R. § 114-14-6.3?
- Did the Company pay out amount agreed upon within (15) working days as required by W. Va. Code R. §114-14-6.11?

G4. CLAIMS: The regulated entity responds to claims correspondence in a timely manner. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 4)

- Did the company reply to pertinent communications from a claimant when a response is reasonably expected within fifteen (15) working days per W. Va. Code § 33-11-4(9)(b) and W. Va. Code R. §114-14-5.3?

G5. CLAIMS: Claim files are adequately documented. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 5)

- Do the files contain all notes and work papers pertaining to the claim in such detail that pertinent events and the dates of such events can be reconstructed? [W. Va. Code §33-11-4(9) et. seq, W. Va. Code R. §§ 114-14-3 & 114-15-4.4]

G6. CLAIMS: Claims are properly handled according with policy provisions and applicable statutes (including HIPPA), rules and regulations. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 6)

- Is the Company following the standards for prompt investigations as stated in W. Va. Code R. §114-14-6.1?
- Did the Company attempt in good faith to effectuate prompt, fair and equitable settlements of claims in which liability has become reasonably clear as required by W. Va. Code § 33-11-4(9)(f) and W. Va. Code R. §§ 114-14-6.4 & 6.10?
- Was coverage checked for proper application of deductible or appropriate exclusionary language as required by W. Va. Code § 33-11-4(9)(a)?
- When applicable is the claimant, who is neither an attorney or represented by an attorney given written notice of that statute of limitation as required by W. Va. Code R. § 114-14-6.12?
- Does the Company ensure where liability and damages are reasonably clear, that no person recommends that third-party claimants make claim under their own policies solely to avoid paying claims under an insurer's insurance policy or insurance contract as required by W. Va. Code § 33-11-4(9)(m) and W. Va. Code R. § 114-14-6.13?

G7. CLAIMS: Denied and closed without payment claims are handled in accordance with policy provisions and state law. (2024 NAIC Market Regulation Handbook Chapter 20, § G Standard 9)

- Was a prompt, reasonable and objective investigation conducted prior to refusal of payment? [W. Va. Code §33-11-4(9)(d)]
- Is the denial based upon specific policy provisions or exclusions?
- Is the claimant provided with a reasonable basis for the denial when required by statute or regulation? [W. Va. Code §33-11-4(9)(n) and W. Va. Code R. §114-14-6.5]
- Is the claimant given the option of contacting the Commissioner's Office and provided with its mailing address, telephone number, and website address? [W. Va. Code R. §114-14-6.17]
- Is the claimant who is neither an attorney or represented by an attorney given written notice of the statute of limitation? [W. Va. Code R. §114-14-6.12]

COMPLIANCE TABLE

<u>Review Section</u>	<u># Pass</u>	<u># Fail</u>	<u>Minimum Standard Compliance %</u>	<u>Compliance Result %</u>	<u>Examination Result</u>		
					<u>Compliant</u>	<u>Predominantly Compliant</u>	<u>Non-Compliant</u>
A1	N/A	N/A	N/A	N/A	-	-	-
A2	N/A	N/A	N/A	N/A	-	-	-
B1	10	0	90%	100%	X		
B2	10	0	90%	100%	X		
B3	10	0	90%	100%	X		
D1	25	0	90%	100%	X		
D2	20	0	90%	100%	X		
D3	25	0	90%	100%	X		
D4	25	0	90%	100%	X		
E1	10	0	90%	100%	X		
E2	8	0	90%	100%	X		
E3	35	0	90%	100%	X		
F1	20	0	90%	100%	X		
F2	20	0	90%	100%	X		
F3	20	0	90%	100%	X		
F4	16	0	90%	100%	X		
F5	20	0	90%	100%	X		
F6	10	0	90%	100%	X		
F7	14	0	90%	100%	X		
G1	50	0	93%	100%	X		
G2	50	0	93%	100%	X		
G3	45	0	93%	100%	X		
G4	50	0	93%	100%	X		
G5	50	0	93%	100%	X		
G6	25	0	93%	100%	X		
G7	25	0	93%	100%	X		

OBSERVATIONS

A1. OPERATIONS AND MANAGEMENT – This standard is not under review for this examination.

A2. OPERATIONS AND MANAGEMENT – This standard is not under review for this examination.

B1. COMPLAINT HANDLING - The Company is maintaining a complaint log for both direct and indirect complaints in accordance with the requirements of the Insurance Commissioner. The Company log reconciled with WVOIC records for this examination.

B2. COMPLAINT HANDLING – The Company was found to be compliant with its complaint handling, and has adequate complaint handling procedures in place.

B3. COMPLAINT HANDLING - All Complaints reviewed were answered within 15 working days.

D1. PRODUCER LICENSING – Producer records reconciled with WVOIC records.

D2. PRODUCER LICENSING – Producers were properly appointed by the Company on all new business reviewed.

D3. PRODUCER LICENSING – Notification of Termination letters were sent to both the WVOIC and the terminated producer on all terminated producer records that were reviewed.

D4. PRODUCER LICENSING – All producer records reviewed had adequate documentation showing the reason for termination.

E1. POLICYHOLDER SERVICE – All policies reviewed had premium/billing notices sent out via the Company's procedures.

E2. POLICYHOLDER SERVICE – Policies were issued and canceled timely. Most new business policies were issued within a week of submission, and the majority of the insured-requested cancellations were processed the same day the cancellation notice was received.

E3. POLICYHOLDER SERVICE – Unearned premiums were calculated correctly and returned timely to the appropriate party on all cancellations reviewed.

F1. UNDERWRITING AND RATING – Farmers' Mutual Fire Insurance Companies are not required to file rates with the Commissioner's Office; however, for the new business rates that were reviewed for this exam, all were found to be adequate and not unfairly discriminatory.

F2. UNDERWRITING AND RATING – Examiner found no evidence of unfairly discriminatory underwriting practices during new business policy review.

F3. UNDERWRITING AND RATING - The Company followed its underwriting guidelines and conformed to applicable statutes, rules, and regulations on all new business reviewed.

F4. UNDERWRITING AND RATING – Policy forms and endorsements reviewed were filed with and approved by the WVOIC.

F5. UNDERWRITING AND RATING –The company followed company procedures when issuing renewals and endorsements on all files reviewed.

F6. UNDERWRITING AND RATING – The Company sent out written notice of cancellation/non-renewal at least five (5) days prior to the effective date. The Company was not required to document a valid reason for cancellation as it is not subject to W. Va. Code §33-17A-4; however, reasons were provided and found to not be unfairly discriminatory (W Va. Code §33-11-4(7)(c)).

G1. CLAIMS –The claimant was contacted within fifteen (15) working days from the date of the loss notice on all claims reviewed.

G2. CLAIMS – The Company conducted timely investigations on all claims reviewed.

G3. CLAIMS – The Company affirmed or denied coverage of claims within a reasonable time after proof of loss statements had been completed, denied the claims or made a written offer within ten (10) working days of completed investigation, and made timely payments on amounts agreed upon.

G4. CLAIMS- The company replied to pertinent communications within fifteen (15) working days on all claims reviewed.

G5. CLAIMS –All claim files were adequately documented and consisted of notes and work papers pertaining to the claim in such detail that pertinent events and dates can be reconstructed.

G6. CLAIMS - The Company complied with policy provisions, applicable statutes, rules, and regulations under this standard. Investigations were prompt and thorough, settlements offered were fair and within policy limits and policy provisions, and third-party claimants were not advised to file claims under their policy to avoid payment under the insurer's policy.


G7. CLAIMS – All denied and closed without payment claims reviewed were handled in accordance with policy provisions and state law.

RECOMMENDATIONS

A formal list of examiner recommendations has been deemed unnecessary as there were no standards of non-compliance found during the examination.

EXAMINER'S SIGNATURE AND ACKNOWLEDGEMENT

The examiner would like to acknowledge the cooperation and assistance extended by the Company during the examination.



Jeremy White APIR
Examiner-in-Charge

EXAMINER'S AFFIDAVIT

State of West Virginia

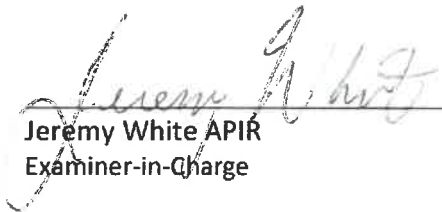
County of Kanawha

**EXAMINER'S AFFIDAVIT AS TO STANDARDS AND PROCEDURES
USED IN AN EXAMINATION**

I, Jeremy White, being duly sworn, states as follows:

1. I have the authority to represent West Virginia in the examination of Municipal Mutual Insurance Company. I have reviewed the examination work papers and examination report, and the examination of Municipal Mutual Insurance Company was performed in a manner consistent with the standards and procedures required by West Virginia.

The affiant says nothing further.



Jeremy White APIR
Examiner-in-Charge

Subscribed and sworn before me by Jeremy White on this 27th day of October 2025.



Notary Public

My commission expires: 10-11-2029 (date).

