

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

CHLORA LINDLEY-MYERS, Director,)	
Department of Commerce and Insurance of the)	
State of Missouri,)	
)	
Plaintiff,)	
)	Case No. 23AC-CC04735
v.)	
)	
CAMERON MUTUAL INSURANCE COMPANY, and)	
CAMERON NATIONAL INSURANCE COMPANY,)	
)	
Defendants.)	

RECEIVER'S FIRST STATUS REPORT

COMES NOW Chlora Lindley-Myers, the Director (“Director”) of the Missouri Department of Commerce and Insurance (“Department”), in her capacity as the court-appointed liquidator (“Liquidator”) of Cameron Mutual Insurance Company (“Cameron Mutual”) and the court-appointed rehabilitator (“Rehabilitator”) of Cameron National Insurance Company (“Cameron National”),¹ pursuant to the Missouri Insurers Supervision, Rehabilitation and Liquidation Act, §§ 375.1150 to 375.1246, RSMo (the “Act”), and provides the Court with her First Status Report regarding the Receivership Case, including the Receiver’s report and accounting as to Cameron National Insurance Company under § 375.1166.

I. Procedural Background

On August 7, 2023, the Court entered an Order of Rehabilitation (“Rehabilitation Order”) of Cameron Mutual and Cameron National and appointed the Director to serve as Rehabilitator. Effective December 1, 2023, the Court entered a Judgment, Decree, and Final Order of Liquidation (“Liquidation Order”) of Cameron Mutual and appointed the Director to serve as Liquidator. On

¹ Because Cameron Mutual is in liquidation and Cameron National is in rehabilitation, this case will be referred to as the “Receivership Case” and the Director as “Receiver” given her dual roles as a Liquidator and Rehabilitator.

December 26, 2023, the Court entered an order finding that Cameron Mutual was insolvent which had the effect of triggering the affected state Guaranty Associations² in relation to policy claims and claims for unearned premium. On February 21, 2021, the Court entered an Order Approving Receivership Procedures (“Procedures Order”) under which the Rehabilitator’s first report and periodic accounting as to Cameron National under § 375.1166.2, RSMo, shall be filed by March 15, 2024.

II. Notice to Policyholders and Creditors

Pursuant to the Court’s Liquidation Order, the Receiver provided notice of the Liquidation Order as follows:

1. **Policyholder Notice.** Written notice of the liquidation was sent by U.S. mail to 12,893 policyholders of record in late November 2023 in the form reflected in Exhibit A (Policyholder Notice of Liquidation). The same notice was sent by U.S. mail to *corrected* mailing addresses for approximately 1,607 policyholders in December 2023. The Policyholder Notice and a copy of the Liquidation Order was also posted to the websites for Cameron Mutual and the Department on or about November 17, 2023.³ Finally, individuals and firms involved in policy related litigation received a notice of the liquidation via U.S. mail issued to approximately 115 recipients.
2. **Answers to Frequently Asked Questions.** A document with answers to frequently asked questions was posted to the websites for Cameron Mutual and the

² The affected Guaranty Associations include the Missouri Property and Casualty Insurance Guaranty Association (“Missouri GA”), the Iowa Insurance Guaranty Association (“Iowa GA”), and the Arkansas Property and Casualty Guaranty Fund (“Arkansas GA”).

³ The Cameron Mutual website is <https://www.cameron-insurance.com/> and the Department’s relevant webpage is <https://insurance.mo.gov/companies/receiv.php>.

Department and has been regularly updated. *See* Exhibit B – Update as of November 16, 2023, posted on or around November 17, 2023; Exhibit C – Update posted on or about January 6, 2024); and Exhibit D – Update posted on or about January 25, 2024 to Cameron site, agent portal, and sent to agents by email).

3. **Agent Notice.** Written notice of the liquidation was sent by U.S. Mail to 433 agencies and agents of record on all Cameron Mutual policies in late November 2023. In addition, on or about November 17, 2023, agents received an Agent Update regarding the liquidation by email to the agent/agency and posting to the Cameron Mutual agent portal and Cameron Mutual website as reflected in Exhibit E. (Agents also received periodic updates via email and posting to the Agent portal during rehabilitation.)
4. **General Creditor Notice.** The Liquidator issued a written notice of liquidation (General Creditor notice, Exhibit F) by U.S. mail to all other known general creditors of Cameron Mutual in late November 2023 (225 creditors) with periodic notices being sent by U.S. mail as any other creditors have been identified, including notice to unclaimed property claimants (notices issued in late January 2024), and approximately 45 loss adjustment vendors (notices issued in early February). Notice has been sent to all known current and former employees of Cameron Mutual. Finally, the General Creditor notice is posted to the websites for Cameron Mutual and the Department.
5. **Notice by Publication.** The Liquidator arranged for notice of the liquidation to be published for four consecutive weeks in the *Cameron Citizen Observer* (11/30/2023, 12/7/2023, 12/14/2023 and 12/21/2023) and in the *Dekalb County*

Record Herald (11/23/2023, 11/30/2023, 12/7/2023 and 12/14/2023) as reflected in the Affidavits of Publication (Exhibits G and H).

6. The Liquidator provided written notice of the liquidation to the affected state Guaranty Associations/Funds and the respective Departments of Insurance in Missouri, Arkansas, and Iowa.

Finally, the Cameron Mutual Proof of Claim Form (Exhibit I) is available on the websites for Cameron Mutual and the Department. The Cameron Mutual website includes a link to submit a Proof of Claim online. **The deadline for any claim against the Estate is March 29, 2024.** The Liquidator and her staff continue to receive and review Proofs of Claim by creditors which may be submitted by email, online, U.S. mail, or fax.

III. Transmission of Policy and Premium Refund Data to the Guaranty Associations and Handling of Claims in the Interim

Cameron Mutual's IT systems for policy claims are extremely complex. After working through several complications, the Estate has completed its transmission of a copy of all data requested by the affected Guaranty Associations. The Guaranty Associations are now in the process of reviewing and processing premium refund and policy claims.

During the interim period when the Estate was working to send the affected Guaranty Associations the requested data, the Liquidator and her staff worked with the Guaranty Associations to develop a system for payment of urgent or hardship claims. The Special Deputy Liquidator entered into a Prepayment Agreement with the Missouri GA and the Iowa GA which allowed the Estate to fund agreed upon urgent or hardship policy claims, subject to the Estate's right to seek reimbursement from the affected Guaranty Association. The Arkansas GA did not enter into the Prepayment Agreement, but the Liquidator's staff and Arkansas GA representatives

still conferred to arrange for expedited review of urgent claims by the Arkansas Guaranty Association.

IV. Status Report and Accounting on Cameron National

Cameron National, which is in rehabilitation, is the wholly owned subsidiary of Cameron Mutual, which is in liquidation. Cameron National has not written any insurance business for several years, but it maintains active insurance licenses in Arkansas, Missouri, Iowa, Kansas, Nebraska, and Illinois. Cameron National also maintains its mandatory statutory capital and surplus of approximately \$3 million. Pursuant to the Court's Procedures Order, Cameron National's most recent financial statement is attached and filed under seal as Exhibit J.

The Receiver does not currently anticipate proposing a plan under § 375.1168.4 RSMo to reorganize, consolidate, or otherwise transform Cameron National. Rather, the Receiver is evaluating a potential stock sale of Cameron National which would be subject to the review and approval of this Court. Several prospective buyers have contacted the Receiver and her staff expressing interest in acquiring the stock of Cameron National, under which they would presumably pay the value of the insurance licenses plus other assets. The Receiver is permitting prospective buyers to review background materials relating to Cameron National upon execution of a non-disclosure agreement. If the Receiver determines that a sale of Cameron National is in the best interest of policyholders and other creditors, the Receiver will file a motion for approval of the sale with the Court.

V. Other Matters

The Receiver is in the process of evaluating contracts to which Cameron Mutual is a party and, for those contracts which are obsolete or not in the best interest of the Estate, the Receiver is providing notice of disavowal and repudiation under §§ 375.1182.1(11); 375.1184, RSMo. The

Receiver is evaluating options for sale of the bulk of Cameron Mutual's office furnishings which would allow for termination of its current lease to secure alternate smaller and less expensive facilities. Finally, the number of employees of Cameron Mutual has declined over the last year given Cameron Mutual's determination to wind down its insurance operations and the receivership. The Receiver will continue to provide periodic updates to the Liquidation Court on material developments.

Respectfully submitted,

/s/ Shelley L. Forrest

Shelley L. Forrest Mo. Bar No. 46455
 Receivership Counsel
 Department of Commerce and Insurance
 PO Box 690
 Jefferson City, MO 65102
 Telephone: (573) 522-6115
Shelley.Forrest@insurance.mo.gov

and

/s/ Kirsten A. Byrd

Kirsten A. Byrd, MO Bar No. 51479
 Michael D. Fielding, MO Bar No. 53124
 Katie R. Andersen, MO Bar No. 74548
 HUSCH BLACKWELL LLP
 4801 Main St., Suite 1000
 Kansas City, MO 64112
 Telephone: (816) 983-8000
 Fax: (816) 983-8080
Kirsten.Byrd@huschblackwell.com
Michael.Fielding@huschblackwell.com
Katie.Andersen@huschblackwell.com

ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 12, 2024, a copy of the foregoing was electronically filed with the Clerk of the Court via the Court's Case.net system, which will provide notice of same to all counsel of record and via email to the following:

Tamara W. Kopp
Executive Director
Missouri Property and Casualty Insurance Guaranty Association
630 Bolivar Street, Suite 204
Jefferson City, MO 65101
Phone: 573-634-8455
Fax: 573-634-8488
Email: tkopp@moiga.org

Steven Augspurger, General Counsel
Iowa Insurance Guaranty Association
801 Grand Avenue, Suite 3700
Des Moines, IA 50309-8004
Phone: (515) 246-5890
Fax: (515) 246-5808
Email: augspurger.steven@bradshawlaw.com

Mike Surguine, Administrator
Arkansas Property & Casualty Guaranty Fund
1023 West Capitol Avenue, Suite 2
Little Rock, AR 72201
Phone: (501) 371-2776
Fax: (501) 371-2774
Email: michael.surguine@arkansas.gov

/s/ Kirsten A. Byrd
Attorney for the Receiver