

be fulfilled in 2021:

- a final distribution of estate assets;
- completing a final estate accounting; and
- Destroying stored-records and filing a federal tax return.

The liquidation estate continues to ensure ongoing compliance with state and federal law and now submits this motion requesting that this Court approve a final distribution of WINHealth assets and close the liquidation proceeding.

The liquidation manager has completed the determination of all properly received policyholder-class proofs of claim and released a \$6 million distribution to the Wyoming Life and Health Insurance Guaranty Association and two other policyholder-class creditors in accordance with this Court's September 26, 2017 approval order. As part of the 2017 distribution WINHealth also paid approximately \$700,000 in priority costs of administration (Wyo. Stat. Ann. § 26-28-125(a)(i)) to the Association for essential expenses incurred to trigger, implement, and manage to conclusion the Association's statutory requirements associated with the liquidation proceeding. Finally, after extensive efforts by estate counsel and recent favorable legal rulings, the WINhealth liquidation estate has resolved and completed collecting a material receivable due from the federal government.

On August 25, 2017, Tom Glause, then the Wyoming State Insurance Commissioner, filed a complaint on behalf of the WINHealth liquidation estate in the United States Court of Federal Claims seeking damages under section 1342 of the Affordable Care Act for benefit years 2014, 2015, and 2016. In response to a number of similar complaints filed against the United States for damages under section 1342 of the Affordable Care Act, the United States Supreme Court issued

a writ of certiorari. *Maine Community Health Options v. United States*, 139 S. Ct. 2743 (2019). On April 27, 2020, the Court held that section 1342 of the Affordable Care Act “created an obligation neither contingent on nor limited by the availability of appropriations or other funds,” and that the “petitioners may seek to collect payment through a damages action in the Court of Federal Claims.” *Maine Community Health Options v. United States*, 140 S. Ct. 1308, 1323, 1331 (2020). As such, the United States and the WINHealth liquidation estate agreed that the Supreme Court’s *Maine Community Health Options* ruling entitles WINHealth to payment under section 1342 of the ACA. After the trial court entered a favorable ruling and after a number of weeks of negotiation between counsel for the United States and counsel for the WINHealth liquidation estate, the parties agreed to a stipulated judgement awarding WINHealth payment under the risk corridors program in the amount of \$17,854,774.09.

During the negotiation between the parties, the United States asserted its rights to offset or collect other debts arising under other programs within the federal Affordable Care Act. After initially exchanging limited counter terms, the liquidation estate faced impasse over certain terms. In an effort to avoid protracted and costly litigation and the associated delay, the Honorable Jeff Rude, the Wyoming Insurance Commissioner acting on behalf of the WINHealth liquidation estate, agreed to allow for the offset of \$238,716.56 in retroactively billed premiums due the United States under the federal Transitional Reinsurance Program. As part of the settlement terms, the United States argued and insisted that statutory interest be paid on its premium claim. Ultimately the parties agreed to an additional offset of \$60,141.67 in interest at the statutory rate resulting in a total offset of \$298,858.23 against the stipulated payment due to WINHealth. On August 17, 2020, the Court of Federal Claims entered its judgement awarding payment of \$17,555,915.86 to

the WINHealth liquidation estate as well as awarding the United States payment of \$298,858.23. On September 29, 2020, the WINHealth liquidation estate received \$17,555,915.86 in good funds from the federal government together with defined mutual releases. The federal receivable was the final asset the WINHealth estate was working to monetize before seeking a final distribution and closure order.

The WINHealth estate continues to process minimal essential vendor payments and infrequent void/re-issues of prior claim payments coupled with the liquidation estate's on-going reporting requirements (both legal and financial). The Commissioner has completed the run-off of all Association-covered health insurance claims in accordance with the terms and conditions of the covered policies, the Wyoming liquidation statutes, and this Court's direction. All WINHealth policies were terminated effective December 31, 2015. The WINHealth policy appeal period lapsed on June 30, 2017, and consequently, the liquidation estate, in coordination with the Association, processed and paid its last approved run-off claims run in June of 2017. The only remaining approved and unpaid health policy claims are the remaining balances on those claims that exceeded the Wyoming statutory limit on covered claims of \$300,000 per member. These "over-cap" claimants received payment of an equitable portion of their claims as part of the 2017 court-approved distribution mentioned above. Subject to this Court's approval as requested by this motion, at the time the WINHealth estate releases its final asset distribution to the policyholder-class creditors, the "over-cap" claimants will continue to participate on an equitable basis. Further, and consistent with the 2017 distribution, WINHealth will also continue to honor and pay the remaining unpaid portion of certain earned premium refunds due the Laramie County Government as part of a risk sharing program operated by WINHealth.

After taking into consideration the \$6 million distribution made in 2017, the WINHealth estate continues to owe approximately 79% of the approved claims under Wyo. Stat. Ann. § 26-28-125(a)(iii). Accordingly, the Commissioner proposes to distribute estate funds proportional to the approved balances still owed to each creditor in the approved claims group as follows:

Wyoming Health and Life Insurance Guaranty Association:	\$17,241,673
Over the Statutory Cap Claims	\$ 53,785
Risk Sharing Claims	\$ 38,418
Total Distribution:	\$17,333,876

As a component of the unpaid balance due each of the approved creditor groups above, the WINHealth liquidation estate seeks approval to pay a modest portion of interest accrued on the unpaid balance of each approved policyholder-level claim. In an effort to ensure treatment consistent with the statutory interest paid to the federal government, the WINHealth estate has applied a simple market interest rate on all unpaid claim and claim expense advances made by the Association. Following discussions with the Association, the liquidation estate has used the historical investment interest rate earned by the Association during the liquidation proceeding. While this simple rate of interest fluctuates throughout this period, the overall average rate applied is substantially less than the statutory rate of interest applied by the federal government. The WINHealth estate will also pay an equitable amount of interest at the historical Association rate to the other approved Class (a)(iii) creditors when it distributes the funds. The interest calculation for all policyholder-class creditors begins at the time the liquidation estate incurred the respective obligation, factors in all early access recoveries paid to the Association, prior distribution payments, check voids, and other applicable offsets and runs through November 30, 2020. The

estate does not hold sufficient assets to pay 100% of the interest accrual for the approved creditor class and determined November 30, 2020, as the most reasonable and fair date given the limitation of available funds.

As of November 30, 2020, WINHealth's assets consist of approximately \$17,583,876 in cash. The Commissioner asks that he be permitted to distribute \$17,333,876.88 of that cash asset with a balance of approximately \$250,000 retained for ongoing estate management to closure. The reserved amount will be used to pay the estate's final administrative costs, including but not limited to, the estate's cost to prepare and complete this contemplated final distribution, completing a final estate accounting, destroying all remaining stored records, and filing any required state tax statements and a federal tax return.

This proposed distribution of \$17,333,876 represents 100% of the principal claim amount owed to each creditor and approximately 61% of the interest accrual due to each creditor. It represents paying out essentially all of WINHealth's remaining cash assets. As discussed above, the estate will need to remain open to allow the Commissioner to complete the proposed final distribution and estate closure requirements (final accounting, records destruction and tax filings) and thereafter file a Declaration of Compliance with this Court confirming compliance with this court's closure order. At the time of the final disclosure, the estate will distribute any remaining funds to pay a portion of the remaining interest balance due to each Class (a)(iii) creditor on an equitable basis to the overall class.

The Commissioner requests that the Court approve the recommended final distributions discussed above to the Wyoming Life and Health Insurance Guaranty Association, the WINHealth "over-cap" claimants, and the City of Laramie, all three of which are Class (a)(iii) approved

creditors. The distributions will be final distributions and the previous and current distributions to the Association will no longer be subject to repayment to the WINHealth estate pursuant to Wyo. Stat. Ann. § 26-28-125(b)(iv). The Commissioner also requests that the Court approve the Commissioner's plan to complete all closure requirements and distribute any remaining estate cash assets to the Class (a)(iii) approved creditors. The Commissioner, through his Liquidation Manager, will file a Declaration of Compliance and any other reports the Court may require when it completes all closure requirements and the release of any final cash assets to the approved policyholder class creditors. Finally, the Commissioner requests that the Court schedule a hearing to consider this motion.

DATED this 21st day of January, 2021.



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ATTORNEYS FOR STATE OF WYOMING

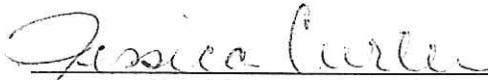
CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January 2021, the foregoing was served by mail or hand delivery to:

WINHealth Partners
ATTN: Scott Pearce 106 6th Avenue
Cheyenne, WY 82002
Email: Pearces@caclo.org

Cindy Coles Oliver
Email: coliver@lrrc.com
Frank D. O'Loughlin
Email: foloughlin@lrrc.com
1200 Seventeenth Street, Suite 3000
Denver, CO 80202
Counsel for the Wyoming Guaranty Association

Courtesy Copy:
Judge Thomas T.C. Campbell
First Judicial District Court
309 W. 20th Street
Cheyenne, WY 82001

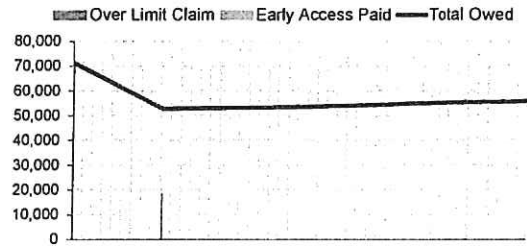

Office of the Attorney General

Insolvency Estate: WINHealth Partners, Inc.

CLAIMANT: Over Limit PH

Days in Year (for interest calculation)

Summary To Date	
Total Claim Level Early Access	\$ (18,745.77)
<u>Policyholder Claim</u>	\$ 71,058.34
Total Interest Accrued	\$ 3,370.30
Total Interest Paid	\$ -
Total Currently Owed-Claim Level	\$ 55,682.87



Payment History:

Rounding of Interest Accrued is: On

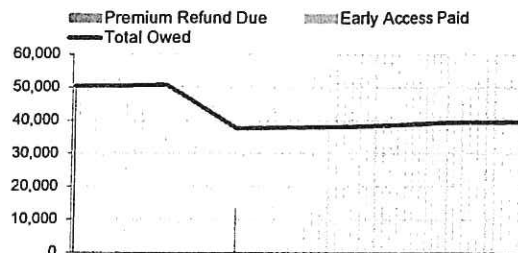
Date	Interest Rate	Early Access Paid	<u>Over Limit Claim</u>	Memo	Interest Accrued	Interest Paid	Interest Balance	Principal Paid	Principal Balance	Total Owed
1/2/17	0.750%		71,058.34		1.46	0.00	1.46	0.00	71,058.34	71,059.80
10/5/17	0.750%	18,745.77	0.00		402.61	0.00	404.07	18,745.77	52,312.57	52,716.64
12/31/17	0.750%		0.00		93.52	0.00	497.59	0.00	52,312.57	52,810.16
12/31/18	1.375%		0.00		719.30	0.00	1,216.89	0.00	52,312.57	53,529.46
12/31/19	2.625%		0.00		1,373.20	0.00	2,590.09	0.00	52,312.57	54,902.66
11/30/20	1.625%		0.00		780.21	0.00	3,370.30	0.00	52,312.57	55,682.87

Exhibit A

Insolvency Estate: WINHealth Partners, Inc.

CLAIMANT: Risk Sharing PH

Days in Year (for interest calculation)



Summary To Date	
Total Claim Level Early Access	\$ (13,286.43)
Premium Refund Claim	\$ 50,364.00
Total Interest Accrued	\$ 2,695.96
Total Interest Paid	\$ -
Total Currently Owed-Claim Level	\$ 39,773.53

Payment History:

Rounding of Interest Accrued is: On

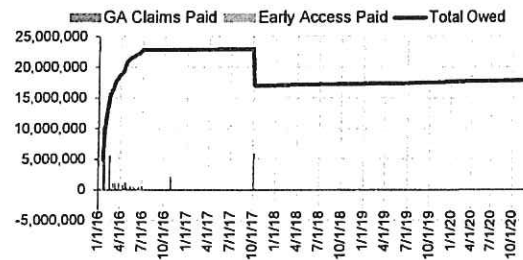
Date	Interest Rate	Early Access Paid	Premium Refund Due	Memo	Interest Accrued	Interest Paid	Interest Balance	Principal Paid	Principal Balance	Total Owed
1/12/16	0.625%		50,364.00		0.86	0.00	0.86	0.00	50,364.00	50,364.86
12/31/16	0.625%		0.00		305.29	0.00	306.15	0.00	50,364.00	50,670.15
10/5/17	0.750%	13,286.43	0.00		287.43	0.00	593.58	13,286.43	37,077.57	37,671.15
12/31/17	0.750%		0.00		66.28	0.00	659.86	0.00	37,077.57	37,737.43
12/31/18	1.375%		0.00		509.82	0.00	1,169.68	0.00	37,077.57	38,247.25
12/31/19	2.625%		0.00		973.29	0.00	2,142.97	0.00	37,077.57	39,220.54
11/30/20	1.625%		0.00		552.99	0.00	2,695.96	0.00	37,077.57	39,773.53

Exhibit B

Insolvency Estate: WINHealth Partners, Inc.

Wyoming LHIGA

Days in Year (for interest calculation)



Summary To Date	
Total Claim Level Early Access	\$ (8,116,081.78)
GA Covered Policyholder Claims Only	\$ 24,766,516.25
Total Interest Accrued	\$ 1,199,591.74
Total Interest Paid	\$ -
Total Currently Owed-Claim Level	\$ 17,850,026.21

Payment History:

Rounding of Interest Accrued is On

Date	Interest Rate	Early Access Paid	GA Claims Paid	Memo	Interest Accrued	Interest Paid	Interest Balance	Principal Paid	Principal Balance	Total Owed
1/21/16	0.625%		4,913,768.87		84.14	0.00	84.14	0.00	4,913,768.87	4,913,853.01
1/27/16	0.625%		5,019,794.30		590.79	0.00	674.93	0.00	9,933,563.17	9,934,238.10
2/16/16	0.625%		5,541,238.66		3,496.79	0.00	4,171.72	0.00	15,474,801.83	15,478,973.55
3/1/16	0.625%		998,941.85		3,726.82	0.00	7,898.54	0.00	16,473,743.68	16,481,642.22
3/10/16	0.625%		993,589.69		2,555.78	0.00	10,454.32	0.00	17,467,333.37	17,477,787.69
3/25/16	0.625%		988,309.60		4,503.40	0.00	14,957.72	0.00	18,455,642.97	18,470,600.69
4/11/16	0.625%		756,172.20		5,385.31	0.00	20,343.03	0.00	19,211,815.17	19,232,158.20
4/21/16	0.625%		1,151,582.41		3,309.41	0.00	23,652.44	0.00	20,363,397.58	20,387,050.02
4/25/16	0.625%		494,615.36		1,403.22	0.00	25,055.66	0.00	20,858,012.94	20,883,068.60
5/11/16	0.625%		501,137.58		5,723.11	0.00	30,778.77	0.00	21,359,150.52	21,389,929.29
5/27/16	0.625%		417,883.16		5,858.98	0.00	36,637.75	0.00	21,777,033.68	21,813,871.43
6/16/16	0.625%		487,154.46		7,466.23	0.00	44,103.98	0.00	22,264,188.14	22,308,292.12
6/28/16	0.625%		497,454.47		4,583.35	0.00	48,687.33	0.00	22,761,642.61	22,810,329.94
10/26/16	0.625%	1,977,794.77	1,977,794.77	claims pd w/early access	46,772.13	0.00	95,459.46	1,977,794.77	22,761,642.61	22,857,102.07
11/30/16	0.625%		0.00		13,641.40	0.00	109,100.86	0.00	22,761,642.61	22,870,743.47
12/19/16	0.625%	73,864.86	73,864.86	claims pd w/early access	7,406.59	0.00	116,507.45	73,864.86	22,761,642.61	22,878,150.06
1/19/17	0.750%	13,932.49	13,932.49	claims pd w/early access	14,499.14	0.00	131,006.59	13,932.49	22,761,642.61	22,892,649.20
2/28/17	0.750%		0.00		18,708.20	0.00	149,714.79	0.00	22,761,642.61	22,911,357.40
3/2/17	0.750%	25,028.01	25,028.01	claims pd w/early access	935.92	0.00	150,650.71	25,028.01	22,761,642.61	22,912,293.32
5/5/17	0.750%	50,706.52	50,706.52	claims pd w/early access	29,934.16	0.00	180,584.87	50,706.52	22,761,642.61	22,942,227.48
6/23/17	0.750%	6,787.33	6,787.33	claims pd w/early access	22,917.68	0.00	203,502.55	6,787.33	22,761,642.61	22,965,145.16
7/31/17	0.750%		0.00		17,772.79	0.00	221,275.34	0.00	22,761,642.61	22,982,917.95
9/30/17	0.750%		0.00		28,530.00	0.00	249,805.34	0.00	22,761,642.61	23,011,447.95
10/5/17	0.750%	5,967,967.80	0.00	Claim level early access distr.	2,221.07	0.00	252,026.41	5,967,967.80	16,793,674.81	17,045,701.22
10/11/17	0.750%		0.00		2,070.45	0.00	254,096.86	0.00	16,793,674.81	17,047,771.67
12/31/17	0.750%		0.00		27,951.12	0.00	282,047.98	0.00	16,793,674.81	17,075,722.79
4/30/18	1.375%		0.00		75,916.61	0.00	357,964.59	0.00	16,793,674.81	17,151,639.40
6/30/18	1.375%		0.00		38,590.94	0.00	396,555.53	0.00	16,793,674.81	17,190,230.34
11/30/18	1.375%		0.00		96,793.68	0.00	493,349.21	0.00	16,793,674.81	17,287,024.02
12/31/18	1.375%		0.00		19,611.79	0.00	512,961.00	0.00	16,793,674.81	17,306,635.81
1/31/19	2.625%		0.00		37,440.69	0.00	550,401.69	0.00	16,793,674.81	17,344,076.50
3/31/19	2.625%		0.00		71,258.09	0.00	621,659.78	0.00	16,793,674.81	17,415,334.59
4/30/19	2.625%		-143,240.34	Recovery of excess claims fundin	36,222.63	0.00	657,882.41	0.00	16,650,434.47	17,308,316.88
7/31/19	2.625%		0.00		110,166.57	0.00	768,048.98	0.00	16,650,434.47	17,418,483.45
9/30/19	2.625%		0.00		73,045.23	0.00	841,094.21	0.00	16,650,434.47	17,491,528.68
10/31/19	2.625%		0.00		37,121.35	0.00	878,215.56	0.00	16,650,434.47	17,528,650.03
11/30/19	2.625%		0.00		35,923.88	0.00	914,139.44	0.00	16,650,434.47	17,564,573.91
12/31/19	2.625%		0.00		37,121.35	0.00	951,260.79	0.00	16,650,434.47	17,601,695.26
2/29/20	1.625%		0.00		44,477.19	0.00	995,737.98	0.00	16,650,434.47	17,646,172.45
3/31/20	1.625%		0.00		22,979.88	0.00	1,018,717.86	0.00	16,650,434.47	17,669,152.33
4/30/20	1.625%		0.00		22,238.59	0.00	1,040,956.45	0.00	16,650,434.47	17,691,390.92
5/31/20	1.625%		0.00		22,979.88	0.00	1,063,936.33	0.00	16,650,434.47	17,714,370.80
6/30/20	1.625%		0.00		22,238.59	0.00	1,086,174.92	0.00	16,650,434.47	17,736,609.39
7/31/20	1.625%		0.00		22,979.88	0.00	1,109,154.80	0.00	16,650,434.47	17,759,589.27
8/31/20	1.625%		0.00		22,979.88	0.00	1,132,134.68	0.00	16,650,434.47	17,782,569.15
9/30/20	1.625%		0.00		22,238.59	0.00	1,154,373.27	0.00	16,650,434.47	17,804,807.74
10/31/20	1.625%		0.00		22,979.88	0.00	1,177,353.15	0.00	16,650,434.47	17,827,787.62
11/30/20	1.625%		0.00		22,238.59	0.00	1,199,591.74	0.00	16,650,434.47	17,850,026.21

WINhealth Partners (UPDATED December 2020)
 Distribution Outline August 2017

Estate Cash (11/30/20)
 Reserve for Admin. *
 Net Cash Available for Distribution (Est.)

Class (a)(iii) Approved Claims

	2017 Distribution:	2020 Distribution:
	7,787,474.00	17,583,876.88
	<u>1,362,843.00</u>	<u>250,000.00</u>
	\$ 6,424,631.00	\$ 17,333,876.88

WYHLIGA
 Over-Cap Claims
 Risk-Premium Refund
 Total Approved Class (a)(iii) Claims

	22,622,381.00	17,850,026.21	0.9947
	71,058.34	55,682.87	0.0031
	<u>50,364.00</u>	<u>39,773.53</u>	0.0022
	\$22,743,803.34	\$17,945,482.61	

Estimated Cash for Distribution #1
 Distribution Percentage to Class (a)(iii) Claim Principal
 Creditor Payout

	6,000,000.00	Distib. #2:	17,333,876.88
	0.26		1.00

WYHLIGA
 Over-Cap Claims
 Risk-Premium Refund
 Total Creditor Payout

	5,967,967.80	17,241,673.76	608,352.45
	18,745.77	53,785.12	1,897.75
	<u>13,286.43</u>	<u>38,418.00</u>	1,355.53
	Distib. #1: \$ 6,000,000.00	Distib. #2: \$ 17,333,876.88	

*NOTE: 2017 Distribution Includes Class(a)(i) WYHLIGA Admin Claim (\$696,943 at 100%) plus July expenses to be paid in August

WINhealth Partners
Wyoming Life & Health Insurance Guaranty Association, WLHIGA
Paid Claims
December 13, 2016

Check Date	Amount
1/20/2016	4,913,768.87
1/21/2016	<u>5,019,794.30</u>
January-16	<u>9,933,563.17</u>
2/8/2016	5,541,238.66
2/23/2016	<u>998,941.85</u>
February-16	<u>6,540,180.51</u>
3/2/2016	993,589.69
3/16/2016	<u>988,309.60</u>
March-16	<u>1,981,899.29</u>
4/1/2016	756,172.20
4/8/2016	1,151,582.41
4/18/2016	<u>494,615.36</u>
April-16	<u>2,402,369.97</u>
5/2/2016	501,137.58
5/17/2016	<u>417,883.16</u>
May-16	<u>919,020.74</u>
6/2/2016	487,154.46
6/20/2016	<u>497,454.47</u>
June-16	<u>984,608.93</u>
10/24/2016	<u>1,977,794.77</u> EAD
October-16	<u>1,977,794.77</u>
12/14/2016	73,864.86 EAD
December-16	<u>73,864.86</u>
1/19/2017	<u>13,932.49</u> EAD
January-17	<u>13,932.49</u>
3/2/2017	<u>25,028.01</u> EAD
March-17	<u>25,028.01</u>
5/5/2017	<u>50,706.52</u> EAD
May-17	<u>50,706.52</u>
6/23/2017	<u>6,787.33</u> EAD
June-17	<u>6,787.33</u>
Total Paid Through 6-23-2017:	\$ 24,909,756.59
Early Access Contributions:	2,148,113.98
Net Claims Paid at 6-23-2017:	<u>22,761,642.61</u>
Less Early Access Distribution 10/5/17:	5,967,967.80
Claim Balance at 12/10/20:	16,793,674.81
Less Excess Cash and Voids	<u>143,240.34</u>
Net Claim	16,650,434.47
Interest through 11/30/20:	1,199,591.74
Balance Due WYLHIGA:	17,850,026.21

Summary of Claims and Proposed Payments, August 2017

Updated as of December 10, 2020
 Net of 2017 Distribution Amounts
 96.59%

Class (a)(iii) Approved Claims

<u>WYFHGA</u>			
<u>Over-Cap Claims</u>		\$22,622,381.00	\$17,850,026.21
<u>Payable Hospital Claims</u>			
CAMPBELL COUNTY MEMORIAL HOSPITAL	\$7,423.84		5,465.37
WYOMING MEDICAL CENTER	\$367.55		270.59
ELKHORN VALLEY REHABILITATION HOSPITAL	\$60,449.54		44,502.46
Total Hosp. Claims	\$68,240.93		\$50,238.42
<u>Payable Medical Claims</u>			
ROCKY MOUNTAIN PM&R LLC	\$1,446.96		1,065.24
GILLETTE MEDICAL IMAGING PC	\$332.50		244.78
Powder River Orthopedics & Spine	\$161.82		119.13
Aune First Assisting	\$876.13		645.00
Total Med. Claims	\$2,817.41		\$2,074.15
Interest Accrual @ the GA rate of investment return:			\$3,370.30
<u>Total Overcap Claims</u>		\$71,058.34	\$55,682.88
<u>Risk-Premium Refund</u>		\$50,364.00	\$37,077.57
Interest Accrual @ the GA rate of investment return:			\$2,695.96
<u>Total Risk Prem. Refund:</u>		\$50,364.00	\$39,773.53
Total Approved Class (a)(iii) Claims		\$22,743,803.34	\$17,945,482.62

Creditor Payout

Estimated Cash Available for Distribution	Distribution #1 2017:	\$6,000,000.00	Distribution #2 2020:	\$17,333,876.88
Distribution Percentage to Class (a)(iii) - Principal		26.38%		100% of Principal Due - Partial Interest

<u>WYFHGA</u>			
<u>Over-Cap Claims</u>		\$5,967,968.80	\$17,241,672.33
<u>Hospital Payments</u>			
CAMPBELL COUNTY MEMORIAL HOSPITAL	1,958.47		5,324.65
WYOMING MEDICAL CENTER	96.96		263.62
ELKHORN VALLEY REHABILITATION HOSPITAL	15,947.08		43,356.66
Total Hosp. Pmts.	\$18,002.51		\$48,944.94
<u>Payable Medical Claims</u>			
ROCKY MOUNTAIN PM&R LLC	381.72		1,037.81
GILLETTE MEDICAL IMAGING PC	87.72		238.48
Powder River Orthopedics & Spine	42.69		116.06
Aune First Assisting	231.13		628.39
Total Med. Pmts.	\$743.26		\$2,020.75
<u>Total Overcap Claims</u>		\$18,745.76	\$53,785.13
<u>Risk-Premium Refund</u>		\$13,286.43	\$38,418.00

Total Distribution Number 1: \$6,000,000.99 Total Distribution #2: \$17,333,875.45 note: \$1.43 rounding error