STATE OF CONNECTICUT

INSURANCE DEPARTMENT

January 14, 2020

Via email (todd.freed@skadden.com)
Todd E. Freed, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, NY 10036

Re: Proposed Acquisition of Control of R.V.I. America Insurance Company by R.V.I. Acquisition Holdings, LLC, R.V.I Holdings, LLC, R.V.I. Manager, LLC and Mark R. Walter
Docket # EX 19-100

Dear Attorney Freed:

The Connecticut Insurance Department ("Department") has completed its review of your submission of January 7, 2020 concerning the proposed acquisition referenced above which was in response to the Department's letter to you of January 2, 2020. We thank you for the completeness of your responses and request that you now incorporate those responses and your prior responses, where appropriate, in the filing mentioned hereafter.

At this point, please provide in hard copies and on a thumb drive amended and restated clean and black lined versions of the Form A rather than standalone amendments. This filing should also include any new or amended exhibits resulting from the amendments and restatements. Any prior filed exhibits not amended do not need to be re-filed.

If you have any questions, or would like to discuss, please let me know.

Sincerely,

Jared T. Kosky
Special Counsel to the Commissioner,
Connecticut Insurance Department

cc: Kathy Belfi, CID
Joan Nakano, CID
Cheryl Bunevich, Skadden, Arps, Slate, Meagher & Flom LLP