

IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO

Mary Jo Hudson, Ohio Superintendent of	:	
Insurance, in her capacity as Liquidator of	:	
American Chambers Life Insurance Company,	:	
	:	Case No. 00CVH-03-2206
Plaintiff,	:	
v.	:	Judge Richard S. Sheward
	:	
American Chambers Life Insurance Company,	:	
	:	
Defendant.	:	

MOTION FOR APPROVAL OF PERIODIC ACCOUNTING FOR THE PERIOD OF JANUARY 1, 2008 TO JUNE 30, 2008

Plaintiff, Mary Jo Hudson, Ohio Superintendent of Insurance, in her capacity as Liquidator of American Chambers Life Insurance Company (the "Liquidator") moves this Court for an Order approving the Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008, as set forth in the attached Exhibit A. The grounds in support of this Motion are set forth in the accompanying Memorandum in Support.

FILED
COMMON PLEAS COURT
FRANKLIN COUNTY, OHIO
2008 SEP 23 PM 3:39
CLERK OF COURTS

Respectfully submitted,

NANCY H. ROGERS
Attorney General State of Ohio

By Outside Counsel:
KEGLER, BROWN, HILL & RITTER
A Legal Professional Association



Richard W. Schuermann, Jr. (0032546)
R. Kevin Kerns (0021781)
65 East State Street, Suite 1800
Columbus, Ohio 43215
(614) 462-5400
Attorneys for the Liquidator of American Chambers Life
Insurance Company

~~4-25-08 13:55 575~~

MEMORANDUM IN SUPPORT

This motion is brought by the Liquidator requesting that this Court approve the Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008, as set forth in the attached Exhibit A.

By Order of this Court entered on May 8, 2000, the Ohio Superintendent of Insurance was appointed Liquidator of American Chambers Life Insurance Company ("ACLIC") and was empowered, authorized and directed to liquidate all of the property and assets of ACLIC in accordance with the laws of Ohio and under the continuing jurisdiction of this Court. As part of the liquidation, the Liquidator collects all debts and moneys due ACLIC, and makes payment of necessary expenses. R.C. 3903.21(A)(4) provides, in pertinent part, that the Liquidator may:

Pay reasonable compensation to persons appointed and defray from the funds or assets of the insurer all expenses of taking possession of, conserving, conducting, liquidating, disposing of, or otherwise dealing with the business and property of the insurer.

Section 3903.42(A) of the Ohio Revised Code provides that the expenses of administration be given first priority in the distribution of assets.

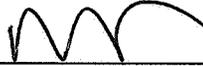
The Liquidator is also required by R.C. 3903.18(E) to periodically account to the Court, throughout the pendency of the ACLIC liquidation proceedings, to be submitted in the form attached hereto as Exhibit A. Such accountings may assist the Court in monitoring the progress and status of the liquidation, and in particular, the receipts and disbursements in the ACLIC proceedings.

WHEREFORE, for the reasons outlined above, the Liquidator respectfully requests the Court to approve the attached Statement of Receipts and Disbursements of the Liquidator for the period January 1, 2008 through June 30, 2008.

Respectfully submitted,

NANCY H. ROGERS
Attorney General State of Ohio

By Outside Counsel:
KEGLER, BROWN, HILL & RITTER
A Legal Professional Association



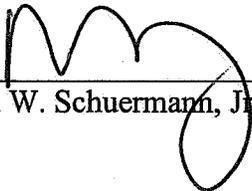
Richard W. Schuermann, Jr. (0032546)
R. Kevin Kerns (0021781)
65 East State Street, Suite 1800
Columbus, Ohio 43215
(614) 462-5400
Attorneys for the Liquidator of
American Chambers Life Insurance Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing instrument was served via ordinary mail on this 23rd day of September, 2008 upon the following:

Charles Richardson, Esq.
Baker & Daniels
805 15th Street NW, Suite 700
Washington, DC 20005

Alan F. Berliner, Esq.
Thompson Hine LLP
10 West Broad Street, Suite 700
Columbus, OH 43215



Richard W. Schuermann, Jr. (0032546)

EXHIBIT A

American Chambers Life Insurance Company, in Liquidation
Statement of Receipts and Disbursements
For the period of January 1 to June 30, 2008

	<u>Cash</u>	<u>Securities/ Investments</u>	<u>Total for Period</u>	<u>Inception to Date</u>
Balance at December 31, 2008	\$ 42,475,805.16	\$ -	\$ 42,475,805.16	14,484,114.96
Receipts:				
Adjustment to 5/8/00 Balance			-	391,703.74
Cole Taylor CD Return			-	588,869.05
Proceeds From Sale Riverbend Venture			-	17,500,000.00
Adjustment to Securities Value			-	(99,722.72)
Investment Income	457,377.51	-	457,377.51	7,014,828.53
Change in Market Value		-	-	77,936.90
Claims Recoveries			-	1,619,005.82
Premiums Received			-	8,859,713.90
Administration Fees			-	1,097,891.19
MMO Reimbursements			-	619,669.93
Disbursements Funded by Others			-	14,012,450.44
Sale of Equipment			-	114,714.37
Miscellaneous Income			-	60,746.65
Insurance Recovery - Theft of Computer/Equipment			-	265.60
Checks Clearing after Liquidation			-	6,588,601.12
Tax Payment Refunds	1.39		1.39	288,215.67
Refund of IL IGA Assessment	392.00		392.00	47,194.29
Reinsurance Premium Recovered			-	817,556.19
Checks not Cleared			-	1,258,435.22
Fen-Phen Settlement			-	60,341.84
Premium Refund			-	38,940.64
Preferential Recoveries			-	3,151,388.70
Recovery from G. Meitzen Trust Settlement	1,375,000.00		1,375,000.00	1,629,547.47
Recovery from Directors & Officers	1,500.00		1,500.00	495,000.00
Recovery of Arkansas Deposit			-	199,250.00
Recovery of Florida Deposit			-	2,058,336.48
Recovery of South Carolina Deposit	27,220.63		27,220.63	1,261,680.63
Recovery Restitution Pmts	177.97		177.97	491,585.65
Subrogation			-	5,000.00
Total Receipts:	\$ 1,861,669.50	\$ -	\$ 1,861,669.50	\$ 70,229,147.30
Disbursements:				
General Operating Expenses	95,421.04		95,421.04	4,665,731.68
Moving & Relocation Costs	14,929.68			14,929.68
Bank Withdrawal for CD			-	3,873.27
Loan Payments			-	124,203.83
Riverbend Transactions			-	1,360,051.40
Legal Expenses	95,594.66		95,594.66	4,156,580.67
Return of Premium Payable - IGAs	3,203,513.22		3,203,513.22	3,203,513.22
Bank Charges			-	130,137.88
Salaries:				
Chief Deputy Liquidator	10,626.61		10,626.61	53,604.23
Deputy Liquidators	18,095.02		18,095.02	234,222.55
Employee Wages, Taxes, Benefits	121,104.85		121,104.85	671,539.11
Payroll (Note 2)			-	716,140.25
Premiums Paid			-	4,172,902.57
Commissions Paid			-	6,391,632.50
Claims Paid			-	14,370,260.15
Dental Claims			-	8,102.71
Premium Refunds Paid to Policy			-	1,091,942.26
Medical Records Fee			-	39,818.32
Flex Benefits			-	5,268.77
Medco Fees			-	691,795.34
PPO Fees			-	104,039.85
Chrgit Sys Ach Debit			-	288.00
Balance Deficiency Chg			-	2,129.10
NSF Premiums			-	318,854.47
Deposit Returns			-	13,750.94
Outside Contracts	3,523.75		3,523.75	1,393,277.68
Investment Purchases			-	6.00
Total Disbursements:	\$ 3,562,808.83	\$ -	\$ 3,547,879.15	\$ 43,938,596.43
Balance at June 30, 2008	\$ 40,774,665.83	\$ -	\$ 40,774,665.83	\$ 40,774,665.83
	Note 3			\$ -

Note 2: Represents total payroll expense from Liquidation Date to 06/30/03. Beginning with the reporting period 07/01/03-12/31/03 the payroll expenses are reported as shown.

Note 3: This balance includes \$40,222,000.00 investment in repurchase agreements and \$502,134.12 ACLIC-Protective interest bearing joint account (encumbered).