



Some confusion arose regarding which financial institutions are covered under Tarrant County's order when the county judge's order seemed to include two contradictory statements about whether or not insurers were defined as "essential businesses." TALHI member Croy-Hall Management reached out to Tarrant County for clarification, and we received the response below, clarifying the insurance companies are included in the definition of financial institution.

From: Rachel N. Arellano [<mailto:RNArellano@TarrantCounty.com>]
Sent: Thursday, March 26, 2020 9:06 AM
To: Brent Thompson <BThompson@CROYHALL.COM>
Subject: FW: Contact the County Judge: Provide feedback or Share a Concern

Good morning, Brent.

Thank you for your inquiry. If your business/industry is deemed Critical Infrastructure as provided by Homeland Security, then you are exempt from Tarrant County's Executive Order.

Respectfully,



RACHEL ARELLANO

Community Outreach Coordinator

Office of Tarrant County Judge B. Glen Whitley

100 E. Weatherford Street | Suite 501 | Fort Worth, TX 76196

Direct: 817.884.1042 | Fax: 817.884.2793 | Mobile: 817.629.9386

RNArellano@TarrantCounty.com



Question regarding Tarrant County's Stay-at-Home Order:

I am legal counsel for four life-and-health insurance companies (Southwest Service Life, Regal Life of America, United Assurance Life, and Capitol Security Life) and the management company that services them (Croy-Hall Management, Inc.), all headquartered in North Richland Hills, Tarrant County, Texas. Our companies are seriously confused by Judge Whitley's stay-at-home order (Order) issued March 24. In his order, Judge Whitley exempted as Essential Businesses those companies that fall within the 16 sectors of CISA's Essential Critical Infrastructure. (See Order, pgs 3-4, Paragraph 15.d.iii). One such sector is "financial institutions." (Order, top pg 4). Under regulations promulgated by CISA under authority of

the federal USA Patriot Act of 2001, “financial institutions” include insurance companies and the companies that service insurance companies. However, later on page 4 of his Order, in subparagraph 15.d.viii, Judge Whitley defined “financial institutions” much more narrowly than CISA regulations. Even more confusingly to us, his definition of “financial institutions” in subparagraph 15.d.viii does NOT include insurance companies! QUERY: Are insurance companies supposed to be included in the list of financial institutions that are exempt from Judge Whitley’s stay-at-home order issued on March 24?

S. Brent Thompson

Assistant Vice President-Legal & Compliance Croy-Hall Management, Inc.

7001 Boulevard 26, Suite 434

North Richland Hills, TX 76180

T: 817.299.4016 F: 817.299.4097