FILED

SEP 29 2025

INSURANCE REGULATION
Docketed by: A.M.Y.

OFFICE OF INSURANCE REGULATION

MICHAEL YAWORSKY
COMMISSIONER

IN THE MATTER OF:

Index: OIR 2025-198
CASE NO.: 401880-25-CO

Application for the Indirect Acquisition of
FIREARMS LEGAL SERVICES INSURANCE COMPANY
by CSC FLP HOLDINGS, LLC
_____/

CONSENT ORDER

THIS CAUSE came for consideration upon the filing with the FLORIDA OFFICE OF INSURANCE REGULATION ("OFFICE") by CSC FLP HOLDINGS, LLC ("APPLICANT"), of an application for the indirect acquisition of 100% of the issued and outstanding voting securities of FIREARMS LEGAL SERVICES INSURANCE COMPANY ("FIREARMS"), pursuant to section 628.4615, Florida Statutes[1] ("Application"). Following a complete review of the entire record, and upon consideration thereof, and being otherwise fully advised in the premises, the OFFICE hereby finds as follows:

1. The OFFICE has jurisdiction over the subject matter and the parties herein.

2. APPLICANT has applied for and, subject to the present and continuing satisfaction of the requirements, terms, and conditions established herein, has satisfactorily met all of the conditions precedent to the granting of approval by the OFFICE for the proposed indirect acquisition of 100% of the issued and outstanding voting securities of FIREARMS, pursuant to the requirements of the Florida Insurance Code.

[1] All statutory references contained herein refer to Florida Statutes (2025), unless otherwise noted.

3. FIREARMS is a Florida corporation operating as a Legal Expense Insurance Corporation through a subsisting Certificate of Authority issued by the OFFICE, pursuant to chapter 642.

4. FIREARMS is 100% owned by FIREARMS LEGAL PROTECTION HOLDINGS, LLC ("HOLDINGS"), a Texas limited liability company, whose membership interest is 100% owned by FLP ACQUISITION ONE, LLC ("FLP"), a Texas limited liability company, whose membership interest is 95.5% owned by the GEORGE WILBURN GRANDCHILDREN'S TRUST (2004) ("WILBURN TRUST"), with no other 10% or greater membership interest holders. Bryan Wilburn serves as the Trustee of the WILBURN TRUST.

5. APPLICANT is a Texas limited liability company whose ownership structure is detailed in the Application and whose ultimate controlling persons are COLIN MCGRADY and DAVID LANDIS.

6. The Application represents that APPLICANT has entered into an agreement to purchase 100% of the membership interest of FLP, which transaction will result in the indirect acquisition of 100% of the issued and outstanding voting securities of FIREARMS ("Transaction"). As a result of the Transaction, FIREARMS will be owned 100% by APPLICANT.

7. If the OFFICE determines that any individual for whom APPLICANT and FIREARMS are required to submit background information as part of this Application is unacceptable under the Florida Insurance Code, APPLICANT or FIREARMS shall remove or cause the removal of said person within thirty days of notice from the OFFICE and replace them with a person or persons acceptable to the OFFICE, or shall undertake such other corrective action as directed by the OFFICE. Failure to act would constitute an immediate serious danger to the

public and the OFFICE may take administrative action as it deems appropriate upon the Certificate of Authority of FIREARMS without further proceedings, pursuant to sections 120.569(2)(n) and 120.60(6).

8. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST represent that, except as disclosed in the Application, there are no other present plans or proposals to make any substantive changes to FIREARMS, including liquidating it, selling any of its assets (except for transactions such as investment portfolio transactions in the ordinary course of business), merging or consolidating it with any person or persons, or making any other major change in its business operations, management or corporate structure.

9. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST represent that there are no agreements, written or oral, related to the Application that have not been provided to the OFFICE.

10. Any material changes to the information submitted in the Application shall be reported to the OFFICE for its review prior to the closing of the Transaction. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST acknowledge that if the OFFICE determines that any of these reported changes would have a material negative impact to the financial condition or operation of FIREARMS, the OFFICE may rescind its approval as granted in this Consent Order by written notice to APPLICANT or FIREARMS.

11. Within ten business days after the Transaction is completed, APPLICANT shall submit, or cause to be submitted, to the OFFICE all documents evidencing completion of said Transaction not already provided to the OFFICE. Further, APPLICANT, COLIN MCGRADY,

DAVID LANDIS, FIREARMS, FLP, HOLDINGS, or WILBURN TRUST shall notify the OFFICE within three business days of a final determination that the Transaction will not occur.

12. Within ten business days after the Transaction is completed, APPLICANT or FIREARMS shall provide to the OFFICE the following documents:

a. An updated Service of Process Consent and Agreement, Form OIR-C1-144, for FIREARMS;

b. An executed copy, certified as appropriate, of the Limited Liability Company Agreement for CSC FLP GP, LLC; and

c. An executed copy, certified as appropriate, of the Amended and Restated Limited Partnership Agreement for Cedar Springs Special Opportunities V, LP.

13. All parties to this Consent Order acknowledge that completion of the Transaction is subject to obtaining any other requisite regulatory or governmental approvals, and that this Consent Order shall be deemed null and void if the Transaction is not completed within sixty days of the execution of this Consent Order. Accordingly, if APPLICANT fails to receive any other requisite approvals, or the Transaction is not completed timely, the provisions of this Consent Order shall terminate automatically and have no effect.

14. Any prior orders, consent orders, or corrective action plans that FIREARMS has entered into with the OFFICE prior to the execution of this Consent Order shall apply and remain in full force and effect for FIREARMS, except where provisions of such orders, consent orders, or corrective action plans have expired; have been superseded by subsequent orders, consent orders, or corrective action plans; or are inconsistent with this Consent Order.

15. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST affirm that all information, explanations, representations,

statements, and documents provided to the OFFICE in connection with this Application, including all attachments and supplements thereto, are true and correct and fully describe all transactions, agreements, ownership structures, understandings, and control with regard to the acquisition and future operations of FIREARMS. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST further agree and affirm that said information, explanations, representations, statements, and documents, including all attachments and supplements thereto, are material to the issuance of this Consent Order and have been relied upon by the OFFICE in its determination to enter into this Consent Order.

16. Any deadlines, reporting requirements, other provisions, or requirements set forth in this Consent Order may be altered or terminated by written approval of the OFFICE. Such approval must be requested in writing prior to any proposed deviation from the terms of this Consent Order.

17. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST affirm that all requirements set forth herein are material to the issuance of this Consent Order.

18. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST expressly waive a hearing in this matter, the making of findings of fact and conclusions of law by the OFFICE, and all further and other proceedings herein to which they may be entitled by law or rules of the OFFICE. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST hereby knowingly and voluntarily waive all rights to challenge or to contest this Consent Order in any forum available to them, now or in the future, including the right to any administrative proceeding, state or federal court action, or any appeal.

19. Each party to this action shall bear its own cost and fees.

20. APPLICANT, COLIN MCGRADY, DAVID LANDIS, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST agree that, upon execution of this Consent Order, failure to adhere to one or more of the terms and conditions contained herein, may result, without further proceedings, in the OFFICE suspending, revoking, or taking other administrative action as it deems appropriate upon the Certificate of Authority of FIREARMS in this state in accordance with sections 120.569(2)(n) and 120.60(6).

21. The parties agree that this Consent Order shall be deemed to be executed when the OFFICE has signed a copy of this Consent Order bearing the notarized signatures of COLIN MCGRADY, DAVID LANDIS, and of the authorized representatives of APPLICANT, FIREARMS, FLP, HOLDINGS, and WILBURN TRUST.

WHEREFORE, subject to the terms and conditions set forth above, the Application for the indirect acquisition of 100% of the issued and outstanding voting securities of FIREARMS LEGAL SERVICES INSURANCE COMPANY by CSC FLP HOLDINGS, LLC, pursuant to section 628.4615, is APPROVED.

FURTHER, all terms and conditions contained herein are hereby ORDERED.

DONE and ORDERED this 29 day of September, 2025.

OFFICE OF INSURANCE REGULATION STATE OF FLORIDA

Michael Yaworsky, Commissioner
Office of Insurance Regulation

By execution hereof, GEORGE WILBURN GRANDCHILDREN'S TRUST (2004) consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind GEORGE WILBURN GRANDCHILDREN'S TRUST (2004) to the terms and conditions of this Consent Order.

GEORGE WILBURN GRANDCHILDREN'S TRUST (2004)

By: _____

Print Name: Bryan Wilburn

Title: Trustee

Date: 09/25/2025

STATE OF TEXAS

COUNTY OF DALLAS

JOANN HABBAS
Notary Public, State of Texas
Comm. Expires 12-22-2026
Notary ID 128462126

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 25th day of SEPTEMBER 2025, by BRYAN WILBURN (name of person)

as TRUSTEE (type of authority; e.g., officer, trustee, attorney in fact) for GEORGE WILBURN GRANDCHILDREN'S TRUST (2004). (company name)

_____
(Signature of the Notary)

JOANN HABBAS
(Print, Type or Stamp Commissioned Name of Notary)

Personally Known X OR Produced Identification _____

Type of Identification Produced _____

My Commission Expires: 12/22/2026

By execution hereof, FIREARMS LEGAL PROTECTION HOLDINGS, LLC, consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind FIREARMS LEGAL PROTECTION HOLDINGS, LLC, to the terms and conditions of this Consent Order.

FIREARMS LEGAL PROTECTION HOLDINGS, LLC

By: _____

Print Name: Bryan Wilburn

[Corporate Seal]

Title: Manager

Date: 09/25/2025

STATE OF TEXAS

COUNTY OF DALLAS

JOANN HABBAS
Notary Public, State of Texas
Comm. Expires 12-22-2026
Notary ID 128462126

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 25th day of SEPTEMBER 2025, by BRYAN WILBURN (name of person) as MANAGER (type of authority; e.g., officer, trustee, attorney in fact) for FIREARMS LEGAL PROTECTION HOLDINGS, LLC. (company name)

_____
(Signature of the Notary)

JOANN HABBAS
(Print, Type or Stamp Commissioned Name of Notary)

Personally Known X OR Produced Identification _____

Type of Identification Produced _____

My Commission Expires: 12/22/2026

By execution hereof, FIREARMS LEGAL SERVICES INSURANCE COMPANY consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind FIREARMS LEGAL SERVICES INSURANCE COMPANY to the terms and conditions of this Consent Order.

FIREARMS LEGAL SERVICES INSURANCE COMPANY

By: _____

Print Name: Bryan Wilburn

[Corporate Seal]

Title: President

Date: 09/25/2025

STATE OF TEXAS

COUNTY OF DALLAS

JOANN HABBAS
Notary Public, State of Texas
Comm. Expires 12-22-2026
Notary ID 128462126

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 25th day of SEPTEMBER 2025, by BRYAN WILBURN (name of person) as PRESIDENT (type of authority; e.g., officer, trustee, attorney in fact) for FIREARMS LEGAL SERVICES INSURANCE COMPANY. (company name)

_____
(Signature of the Notary)

JOANN HABBAS
(Print, Type or Stamp Commissioned Name of Notary)

Personally Known X OR Produced Identification _____

Type of Identification Produced _____

My Commission Expires: 12/22/2026

By execution hereof, CSC FLP HOLDINGS, LLC, consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind CSC FLP HOLDINGS, LLC, to the terms and conditions of this Consent Order.

CSC FLP ~~HOLDINGS~~, LLC

By: _____

Print Name: DAVID LANDIS

[Corporate Seal]

Title: VICE PRESIDENT

Date: 9/26/25

STATE OF Texas

COUNTY OF Dallas

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 26th day of September 2025, by David Raymond Landis (name of person)

as officer (type of authority; e.g., officer, trustee, attorney in fact) for CSC FLP Holdings, LLC (company name).

_____
(Signature of the Notary)

_____
(Print, Type or Stamp Commissioned Name of Notary)

JACOB WILLIAM CAMPBELL
Notary Public, State of Texas
Comm. Expires 11-18-2028
Notary ID 13517477-2

Personally Known _____ OR Produced Identification X

Type of Identification Produced DL

My Commission Expires: 11-18-2028

By execution hereof, FLP ACQUISITION ONE, LLC, consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind FLP ACQUISITION ONE, LLC, to the terms and conditions of this Consent Order.

FLP ACQUISITION ONE, LLC

By: _____

Print Name: Bryan Wilburn

[Corporate Seal]

Title: Manager

Date: 09/25/2025

STATE OF TEXAS

COUNTY OF DALLAS

JOANN HABBAS
Notary Public, State of Texas
Comm. Expires 12-22-2026
Notary ID 128462126

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 25th day of SEPTEMBER 2025, by BRYAN WILBURN
(name of person)

as MANAGER for FLP ACQUISITION ONE, LLC.
(type of authority; e.g., officer, trustee, attorney in fact) (company name)

_____
(Signature of the Notary)

JOANN HABBAS
(Print, Type or Stamp Commissioned Name of Notary)

Personally Known X OR Produced Identification _____

Type of Identification Produced _____

My Commission Expires: 12/22/2026

By execution hereof, COLIN MCGRADY consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein.

By: Colin McGrady

Print Name: COLIN MCGRADY

Date: 26 SEPTEMBER 2025

STATE OF TEXAS

COUNTY OF DALLAS

The foregoing instrument was acknowledged before me by means of ☒ physical presence

or ☐ online notarization, this 26th day of SEPTEMBER 2025, by COLIN MCGRADY
(name of person)

as SELF for N/A .
(type of authority; e.g., officer, trustee, attorney in fact) (company name)

ANA RAMIREZ
Notary Public
STATE OF TEXAS
My Comm. Exp. 06-02-27
Notary ID # 13438967-8

(Signature of the Notary)

ANA RAMIREZ
(Print, Type or Stamp Commissioned Name of Notary)

Personally Known _____ OR Produced Identification X

Type of Identification Produced TEXAS DRIVER LICENSE

My Commission Expires: 06/02/2027

By execution hereof, DAVID LANDIS consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein.

By: _____

Print Name: DAVID LANDIS

Date: 9/26/25

STATE OF Texas

COUNTY OF Dallas

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 26th day of September 2025, by David Raymond Landis
(name of person)

as Self for _____.
(type of authority; e.g., officer, trustee, attorney in fact) (company name)

_____
(Signature of the Notary)

_____
(Print, Type or Stamp Commissioned Name of Notary)

JACOB WILLIAM CAMPBELL
Notary Public, State of Texas
Comm. Expires 11-18-2028
Notary ID 13517477-2

Personally Known _____ OR Produced Identification X

Type of Identification Produced DL

My Commission Expires: 11-18-2028

COPIES FURNISHED TO:

BRYAN WILBURN
The George Wilburn Grandchildren's Trust (2004)
Firearms Legal Protection Holdings, LLC
FLP Acquisition One, LLC
13455 Noel Road, Suite 2300
Dallas, TX 75240
Email: jhabbas@risktheory.com

DAVID LANDIS, VICE PRESIDENT
CSC FLP Holdings, LLC
2525 Knight Street, Suite 300
Dallas, TX 75219
Telephone: (214) 495-1520
Email: dlandis@cedarspringscapital.com

COLIN MCGRADY, VICE PRESIDENT
CSC FLP Holdings, LLC
2525 Knight Street, Suite 300
Dallas, TX 75219
Telephone: (214) 495-1520
Email:
cmcgrady@cedarspringscapital.com

SUSAN T. STEAD, AUTHORIZED REPRESENTATIVE
Egan Nelson LLP
2911 Turtle Creek Blvd., Suite 1100
Dallas, TX 75219
Telephone: (614) 975-8088
Email: sue.stead@egannelson.com

ALISON STERETT, FINANCIAL ADMINISTRATOR
Property & Casualty Financial Oversight
Florida Office of Insurance Regulation
200 East Gaines Street
Tallahassee, FL 32399

RYAN SHAFFER, FINANCIAL EXAMINER/ANALYST SUPERVISOR
Property & Casualty Financial Oversight
Florida Office of Insurance Regulation
200 East Gaines Street
Tallahassee, FL 32399

CHRISTOPHER "CJ" HAWK, FINANCIAL EXAMINER / ANALYST II
Property & Casualty Financial Oversight
Florida Office of Insurance Regulation
200 East Gaines Street
Tallahassee, FL 32399

ALEX CIUPALO, ASSISTANT GENERAL COUNSEL
Florida Office of Insurance Regulation
200 East Gaines Street
Tallahassee, FL 32399
Telephone: (850) 413-4187
Email: alex.ciupalo@floir.com