

**Exhibit 1 - CV and Qualifications**

**Curriculum Vitae**

**EXPERIENCE**

- 2011 - Present                   **PRINCIPAL**  
Elliott S. Flood Company - Consulting, Insurance (*Austin, TX*)
- 2004 - 2011                   **SENIOR VICE PRESIDENT OF INTERNAL AUDIT**  
Texas Mutual Insurance Company (*Austin, TX*)
- 1997 - 2004                   **VICE PRESIDENT OF SPECIAL INVESTIGATIONS**  
Texas Mutual Insurance Company (*Austin, TX*)
- 1986 - 1997                   **ATTORNEY**  
Private practice, solo/small firm - Representation of Insurance Carriers and Insureds (*Austin, TX*)
- 1985 - 1986                   **ACCOUNTANT**  
Touche Ross & Co. (*Austin, TX*)
- 1982 - 1983                   **ATTORNEY**  
Law Offices of Mike Hjalmarson - Representation of Insurance Carriers (*Houston, TX*)
- 1979 - 1981                   **ATTORNEY**  
Bonn, Anderson & Hartmann - General Civil Litigation (*Phoenix, AZ*)

**EDUCATION**

- 1984 - 1985                   **MASTER of PROFESSIONAL ACCOUNTING**  
University of Texas at Austin (*Austin, TX*)
- 1976 - 1979                   **JURIS DOCTOR**  
Arizona State University College of Law (*Tempe, AZ*)
- 1973 - 1976                   **BACHELOR of ARTS**  
Arizona State University (*Tempe, AZ*)

**PROFESSIONAL CERTIFICATIONS AND LICENSES**

- Licensed Insurance Adjuster - All Lines (*Texas Dept. of Insurance*)
- Certified Public Accountant (*Texas State Board of Public Accountancy*)
- Certified Internal Auditor (*The Institute of Internal Auditors*)
- Certified Fraud Examiner (*Association of Certified Fraud Examiners*)  
(*Inactive*, retired status on all licenses/certifications)

## Statement of Qualifications, Publications and Fees

I am a retired insurance company senior vice president who now serves as an independent consultant and expert witness. I have over 30 years of experience in the insurance industry in auditing insurance operations and supervising claims investigations. Over the course of my career, I have:

- Taught insurance customs and practices, in both formal and informal settings, to insurance company auditors, investigators, adjusters, attorneys, executives and board members.
- Participated frequently in national insurer industry groups related to investigations and auditing.
- Conducted peer reviews of other insurer's internal auditing.
- Served as liaison to the state market conduct examinations of my company's compliance with industry standards and assisted the examiners with their work.
- As Senior Vice President reporting to my company's CEO and Board of Directors, I attended and participated in 70-80 Board of Directors' meetings and 200-300 CEO staff meetings.
- Spent hundreds, if not thousands, of hours studying insurance industry literature, using these materials to guide my work in auditing insurance operations, conducting investigations, and supporting the reliability of my expert opinions in court. Examples of industry literature include:
  - Insurer claim handling and underwriting manuals.
  - Market conduct examination reports, manuals, and regulatory settlement agreements.
  - Insurer in-house adjuster, underwriter and auditor training materials.
  - Peer-reviewed textbooks used to train adjusters, agents and underwriters.
  - Internal auditing standards and guidance.

- Insurance regulator-approved continuing education materials.
- Insurance industry periodicals and magazines.

I retired from the insurance industry in 2011. Since 2011, I have continued to examine and opine on insurance matters in my consulting practice. I keep current and continue to broaden and deepen my knowledge of the insurance industry through:

- Research of industry claim handling requirements in many different states as a result of my national consulting practice.
- Hundreds of hours reviewing insurance company internal documents obtained in discovery such as policies and procedures, audits, manuals, and depositions of insurance company managers and executives.
- Continuous update and study of publications that I used extensively while employed in the industry.

I have testified in deposition and trial as an expert witness on insurance industry customs and practices since the 1990s. I have testified via deposition and trial in state court, federal court, tribal court, administrative proceeding (bar disciplinary) and arbitration proceedings in:

- |               |                                 |
|---------------|---------------------------------|
| ● Alabama,    | ● Montana,                      |
| ● Alaska,     | ● Navajo Nation (tribal court), |
| ● Arkansas,   | ● Nevada,                       |
| ● Arizona,    | ● New Mexico,                   |
| ● California, | ● New York,                     |
| ● Colorado,   | ● North Carolina,               |
| ● Florida,    | ● South Dakota,                 |
| ● Idaho,      | ● Texas,                        |
| ● Illinois,   | ● Tennessee,                    |
| ● Kentucky,   | ● Washington,                   |
| ● Michigan,   | ● Wisconsin, and                |
| ● Minnesota,  | ● Wyoming.                      |

I have performed non-testimonial consulting engagements in most of the above jurisdictions and in British Columbia, Georgia, Hawai'i, Iowa, Maryland, and Massachusetts.

## **Publications and Fees**

I have no publications in the last 10 years.

My fee for all time spent on this case is \$350 per hour.