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Disclosure Insight® Report November 30, 2017

AmTrust Financial Services Inc. – AFSI Maiden Holdings Ltd. – MHLD National General Holdings Corp. – NGHC

Disclosure Games®

Recent Positive Price Action in AmTrust Financial Services, Maiden Holdings, and National General Holdings May be Short-Lived

Disclosure Insight® reports provide commentary and analysis on public company interactions with investors and with the SEC. They are heavily reliant on our expertise in using the Freedom of Information Act.

AmTrust Financial Services Inc. – AFSI \$9.74 Mkt Cap \$1.91 B

> Maiden Holdings Ltd. – MHLD \$6.90 Mkt Cap \$584 mm

National General Holdings Corp. – NGHC \$21.49 Mkt Cap \$2.29 B

<u>Summary and Opinion</u>: We remain negative on each of these related companies and believe recent positive price action is not sustainable if undisclosed SEC probes and other challenges continue to pressure them.

As we went to press, this week shares of AFSI were up nearly 12% on no specific news. Investors appear to believe that ongoing instability at the Consumer Financial Protection Bureau (CFPB) will mean reduced regulatory pressure on AFSI entities.

OK, we'll play along. But did you notice that only a few weeks ago <u>A.M. Best placed the credit ratings of AmTrust Financial Services, Inc. and its subsidiaries under review with negative implications?</u>

Negative developments like this don't surprise us as, again, we've been warning of undisclosed SEC probes at EACH of these three companies. Yet against this backdrop we've noted Chairman/CEO Barry Zyskind has a history of attacking the shorts while still refusing to come clean with investors about the SEC probes we keep hearing are on-going. These are the types of Disclosure Games we've found don't usually end well.

<u>From our database</u>: On 08-May-2017, when AFSI closed at \$15.47, we first wrote, <u>Undisclosed SEC probes confirmed at AmTrust Financial Services</u>, <u>Maiden Holdings</u>, and <u>National General Holdings</u>.

On 26-May-2017, we then published Don't Forget, There's Another Shoe Yet to Drop at AmTrust Financial.

For AFSI we last confirmed on-going SEC investigative activity as of 17-Apr-2017. New research for AFSI has been in-process since Oct-2017. For NGHC, on-going SEC investigative activity was last confirmed as of 21-Jul-2017. For MHLD it was on 20-Sep-2017.

Probes Reporter®



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"Disclosure Games®" is a term we use to highlight those public companies engaging in disclosure practices that in our opinion may be misleading, confusing, evasive, or otherwise lacking the transparency needed for investors to make well-informed investment decisions regarding a potentially material exposure.

If we alert you to existence of an undisclosed SEC probe, that means we filed a Freedom of Information Act (FOIA) request with the SEC on the company in question and have a response, in black-and-white, on government letterhead that supports our statement. The only thing we know at this time is that the probe(s) somehow pertains to the conduct, transactions, and/or disclosures of the companies referenced.

New SEC investigative activity could theoretically begin or end after the date covered by the latest information in this report which would not be reflected here. The SEC did not disclose the details on investigations referenced herein. All we know is that they somehow pertain to the conduct, transactions, and/or disclosures of the companies referenced above. Companies with undisclosed SEC investigations are maintained on our Watch List of companies with undisclosed SEC probes.

The SEC reminds us that its assertion of the law enforcement exemption should not be construed as an indication by the Commission or its staff that any violations of law have occurred with respect to any person, entity, or security.

To learn more about our research process, including how to best use this information in your own decision-making, click here.

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