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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 COUNTY OF MERCED

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12 **INSURANCE COMMISSIONER OF THE**
STATE OF CALIFORNIA,

13 Applicant,

14 v.

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16 **MERCED PROPERTY & CASUALTY**
COMPANY, a California corporation,

17 Respondent.
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Case No. 18CV-04739

FINAL STATUS REPORT OF
INSURANCE COMMISSIONER ON THE
LIQUIDATION OF MERCED
PROPERTY & CASUALTY COMPANY

[Filed concurrently with:

1. **Notice of Application and Application for Order to Approve Liquidator's 1) Payment of Administrative and Professional Fees and Expenses for the period of November 1, 2022 to September 30, 2024; 2) Approve Executed Release Agreement with the Federal Government; 3) Authorize Final Disbursement of Merced Assets; 4) Escheat Unclaimed Funds to State; 5) Retain Closing Reserve; 6) Authorize Disposal of Legacy Records; 7) Remit Residual Estate Assets to Parent Entity; 8) Close Estate; Memorandum of Points and Authorities;**
2. **Declaration of Scott Pearce;**
3. **Index of Exhibits; 4. [Proposed] Order**

Date: April 2, 2025
Time: 8:15 a.m.
Dept: 8
Judge: Hon. Stephanie Jamieson
Action Filed: November 30, 2018

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INTRODUCTION

The Insurance Commissioner of the State of California (Commissioner), in his capacity as Liquidator of Merced Property & Casualty Company (Merced), hereby submits the following Final Status Report on the liquidation of Merced.

The purpose of this report is to provide the Court, Merced, and all other interested parties with information regarding the Commissioner’s progress following his Third Status Report to the court on February 23, 2023, and to discuss his anticipated steps toward completing the liquidation of the Merced estate.¹

In his previous Status Reports, the Commissioner included a background discussion on the general aspects of a liquidation proceeding and summarized Merced’s insolvency and placement by the Court into liquidation on December 3, 2018, following the November 8, 2018 Camp Fire in Butte County, California. The Commissioner also previously discussed his and the California Insurance Guarantee Association’s (CIGA) immediate responses to the Merced liquidation. The Commissioner incorporates that previous discussion herein by reference. To the extent necessary to provide context, the Commissioner will reiterate some of that discussion herein for the Court’s convenience.

COMMISSIONER’S ACTIVITIES AND OPERATIONS

I. THE CONSERVATION AND LIQUIDATION OFFICE

The Commissioner created the Conservation and Liquidation Office (CLO) to assist him in fulfilling his duties as a court-appointed Conservator and Liquidator under Insurance Code² section 1035 for troubled insurance companies domiciled in the State of California. (Conservation and Liquidation Office’s website at <<http://www.caclo.org/perl/FAQ.pl>>[as of January 29, 2025].) The CLO consists of insurance professionals who oversee departments that operate and

¹ The Commissioner has concurrently filed an Application for an Order to: 1) Approve Payment of Administrative and Professional Fees and Expenses for the period of November 1, 2022 to September 30, 2024; 2) Approve Executed Release Agreement with the Federal Government; 3) Authorize Final Disbursement of Merced Assets; 4) Escheat Unclaimed Funds to State; 5) Retain Closing Reserve; 6) Authorize Disposal of Legacy Records; and 7) Remit Residual Estate Assets to Parent Entity; Memorandum of Points and Authorities in support thereof (Application).

² Unless otherwise noted, all section references will be to the Insurance Code.

1 liquidate troubled insurance companies. (*Ibid.*) These professionals operate under the executive
2 oversight of a duly appointed Special Deputy Insurance Commissioner. (*Ibid.*) A company that is
3 in conservation or liquidation is called an “estate.” (*Ibid.*) Upon obtaining a conservation or
4 liquidation order, the Commissioner may delegate his statutory administrative duties to liquidate
5 the estate over to the CLO and/or to a Special Deputy Insurance Commissioner. (Ins. Code, §
6 1035.)

7 The CLO is located in San Francisco, California. The Commissioner delegated his statutory
8 administrative duties to liquidate the Merced estate over to the CLO and Deputy Liquidator
9 Joseph Holloway. (Order Approving Liquidator’s Payment of Fees and Interim Disbursement of
10 Merced Assets, dated October 26, 2021, p. 2.) Scott Pearce is the appointed Liquidation Manager
11 of the Merced estate. All of the Merced estate’s physical and electronic records are located in the
12 CLO’s office in San Francisco, and the CLO is managing all remaining closure activities and
13 liquidation requirements from that office.

14 **II. THE COMMISSIONER’S OPERATIONS**

15 **A. California Insurance Guarantee Association’s payment of covered claims 16 and expenses and the Estate’s satisfaction of its Class 2 Proof of Claim**

17 CIGA was created by the Legislature and is statutorily obligated to pay covered claims of
18 an insolvent insurer up to \$500,000. (§ 1063.1, subd. (c)(7)(A).) It also pays for or furnishes loss
19 adjustment services and defenses of claimants when required by policy provisions. (§ 1063.2,
20 subd. (a).) CIGA’s obligation to handle claims or furnish services and defenses is triggered when
21 a member insurer is found by a court to be insolvent and ordered into liquidation. (§ 1063.2.)
22 Upon CIGA’s satisfaction of its obligations under Section 1063.2, CIGA becomes a Class 2
23 priority claimant to the residual assets of the estate after payment of the Commissioner’s Class 1
24 expenses of administration. (*Id.*; § 1033, subd. (a)(1) & (2).)

25 Following the Court’s December 3, 2018 Liquidation Order in this proceeding, the CLO
26 transitioned all of the Merced estate claims data and claims handling processes to CIGA so that
27 CIGA could make payment on Merced policyholder claims. CIGA immediately commenced
28 paying Merced’s covered fire claims. Subsequently, and in an effort to support the guarantee

1 association's continuing claim and expense payments, Merced filed for this Court's approval to
2 release early access distributions of Merced Assets to reimburse CIGA. (Order Approving
3 Liquidator's Payment of Fees and Interim Disbursement of Merced Assets, dated October 26,
4 2021, p. 2; Index of Exhibits filed September 14, 2021, Ex. E [Merced 1st Early Access
5 Distribution].) CIGA has now resolved and paid all of the covered Merced-related policy claims
6 and loss adjustment expenses.

7 After satisfying its obligations under Section 1063.2, CIGA asserted a Class 2 claim against
8 the Merced estate for all claims and expenses it incurred on behalf of the insolvent insurer or are
9 otherwise referable to the Merced liquidation. (§ 1033, subd. (a)(2).) CIGA submitted its claim
10 during the proof of claim (POC) determination process. At year-end 2023, CIGA reported having
11 paid \$77,327,108 in Merced-related claims, \$370,093 in loss adjustment expenses, \$2,984,383 in
12 unearned premium refunds, and incurred \$1,490,424 in administrative expenses for a total of
13 \$82,172,008 it paid on behalf of the Merced liquidation estate. In addition to allowing these paid
14 amounts, Merced permitted CIGA to retain an additional \$6,081 in reserves to resolve the final
15 remaining claims.

16 When determining CIGA's POC, the Merced estate considered CIGA's receipt of
17 \$60,047,831 in subrogation payments and expense recoveries from the PG&E Wildfire
18 Subrogation Trust through the 2019 PG&E bankruptcy plan³. The Merced liquidation estate
19 approved CIGA's adjusted claim in the amount of \$22,130,258.⁴ In addition to the amount it
20 recovered from the PG&E bankruptcy, CIGA also received \$22,592,027 in early access
21 distribution payments directly from the Merced estate during the course of the liquidation. After
22 factoring in all of CIGA's recoveries, the Merced estate determined CIGA had an excess of

23 _____
24 ³ PG&E Corporation and its subsidiary Pacific Gas and Electric Company each filed a
25 voluntary petition for bankruptcy under chapter 11 of the Bankruptcy Code on January 29, 2019.
26 (First Status Report, filed August 7, 2019, p. 15.) As part of this proceeding, the bankruptcy court
27 established a PG&E Wildfire Subrogation Trust to consider and pay claims for damages caused
28 by the November 2018 Camp Fire. CIGA submitted a claim against the PG&E Wildfire
Subrogation Trust for the losses and loss adjustment expenses it paid for Merced Camp Fire-
related claims.)

⁴ \$82,172,008 (CIGA's asserted Class 2 claim) + \$6,081 (amount retained in reserves) -
\$60,047,831 (reimbursements from PG&E Subrogation Trust) = \$22,130,258 (CIGA's approved
adjusted claim).

1 \$461,769 above its approved claim. As a result, and in accordance with the August 19, 2021
 2 Early Access Agreement signed between CIGA and the Merced estate, CIGA remitted the full
 3 amount of the excess funds back to the estate. Thus, CIGA’s approved claim has been satisfied in
 4 full.

5 **B. CLO’s review of remaining Proof of Claims and disbursement of Merced**
 6 **assets to policyholders for approved claims**

7 During the POC determination process, CLO’s Claims Department received and reviewed
 8 452 POCs. (First Status Report, filed August 7, 2019, p. 9.) Section 1033, subdivision (a) sets
 9 forth the priority for payment of claims, listing nine priority preferences. Policyholders and other
 10 claimants obtain priority to the Merced assets according to which Class they fall in, with all
 11 Classes being addressed after the Class 1 administration expenses have been paid. (§ 1033, subd.
 12 (a)(1)-(9).) As shown in the below chart, CLO’s Claims Department has completed the review
 13 and determination of all properly submitted POCs.

Type of Claim	Number of Claims	Status/Resolution
Policyholder Class 2 Claims (§ 1033, subd. (a)(2) [claims under insurance policies])	41	Approved (including CIGA)
Policyholder Class 2 Claims (<i>Ibid.</i>)	312	Rejected.
Federal Government Class 3 Claim (§ 1033, subd. (a)(3) [claims having preference by laws of the United States])	1	Resolved through Federal Waiver/Release
General Creditor Class 7 Claims (§ 1033, subd. (a)(7) [claims of general creditors])	6	Approved
Class 8 Claims (§ 1033, subd. (a)(8) [claims of “equity” classes, such as holders of certificates of contribution])	62	Approved
Mixed Class 3 to 8 Claims (§ 1033, subd. (a) (3)-(8))	40	Rejected
Total Claims	452	

26 After receiving authorization from this Court, the Commissioner disbursed payments to
 27 CIGA and Merced policyholders and all approved Class 2 claims obligations have since been
 28 paid in full. (Order Approving Liquidator’s Payment of Fees and Second Interim Disbursement of

1 Merced Assets, dated February 23, 2023.) There were 312 non-approved Class 2 Merced
2 policyholder claims that were rejected by the Merced estate because they were handled to
3 completion by CIGA or the asserted claim was not covered under a Merced policy. There were 40
4 Mixed Class claims (Classes 3 through 8) that were also rejected because the estate deemed
5 nothing was owed on those claims. (*Ibid.*)

6 After the estate's Class 1 administrative expenses and the policyholder Class 2 claims, the
7 next priority of claims to be addressed by the estate is the federal government's Class 3 Claim.
8 The estate must first seek this Court's approval of the executed federal release and waiver
9 agreement to resolve the Class 3 federal claim before it can make any further disbursements
10 towards the remaining approved lower priority claims. (Index of Exhibits (Index), Ex. F
11 [Executed Federal Release and Waiver Agreement].) Approval of the executed federal release and
12 waiver agreement is necessary to ensure the full and proper release of the Commissioner, the
13 Deputy Liquidator, and the Merced estate, otherwise the Commissioner would be subject to
14 personal liability for any super-priority claims brought by the federal government. The CLO's
15 Claim Department has received a final federal waiver and release agreement from the United
16 States Department of Justice⁵. (*Ibid.*) After the Merced estate obtains Court's approval of the
17 executed federal release agreement, it will then be legally cleared to complete its final distribution
18 of assets to Class 7 and 8 claimants who hold approved and unpaid lower priority claims.

19 As reported above, the estate has approved six Class 7 general creditor claims in the amount
20 of \$172,917.22 and 62 Class 8 equity class claims in the amount of \$197,286.49 for a total
21 distribution of \$370,203.71 for Class 7 and 8 claimants. (Index, Ex. E [Merced Property &
22 Casualty Detailed Spreadsheet: Merced Final Distribution Calculation].) After the federal release
23 and waiver agreement is approved and effective, the estate will then pay the remaining approved
24 Class 7 and Class 8 claims. Following this disbursement of payments, the estate will then escheat
25 unclaimed funds to the state and reserve a closing budget to properly conclude the liquidation. At
26 that point, the Merced estate will have sufficient assets to make a distribution to Class 9

27 _____
28 ⁵ Specific details concerning the federal release will be further discussed below in Section
III.B, the portion of the status report regarding the Commissioner's ongoing activities.

1 “shareholder or other owners in any residual value in the estate” as provided by section 1033,
2 subdivision (a)(9). Merced’s parent company and owner, United Heritage Financial Group, owns
3 100% of the shares of Merced, and thus is entitled to a remittance of all the estate’s remaining net
4 assets.

5 **C. CLO’s recovery of funds from the PG&E Subrogation Trust on payments**
6 **made for Camp Fire-related claims**

7 As previously mentioned with regards to CIGA’s POC, the PG&E Subrogation Trust was
8 established by the bankruptcy court in PG&E Corporation and its subsidiary’s Ch. 11 bankruptcy
9 cases to consider and pay claims for liquidated damages caused by the Camp Fire. (Second Status
10 Report, filed September 14, 2021, pp. 7-8.) Like CIGA, the Merced estate also submitted a proof
11 of claim against the PG&E Subrogation Trust. Since then, the estate received reimbursements
12 through the bankruptcy plan from the PG&E Subrogation Trust and all Class 2 liquidated claim
13 payments associated with the Camp Fire made from the Merced estate have been submitted and
14 approved. The Subrogation Trustee advised the estate of the Trustee’s intention to close the
15 PG&E Subrogation Trust in late 2023. At the closure of the PG&E Subrogation Trust, the Merced
16 estate collected a final “hold-back” payment of approximately \$37,000, resulting in the Merced
17 estate collecting a total of \$3,216,000 in subrogation recoveries from Class 2 claims. This amount
18 does not include the \$60,047,831 recovered by CIGA for their payment of Merced-related fire
19 claims.

20 **D. Recovery on Reinsurance Contracts**

21 As previously reported, the Commissioner recovered \$11,165,000 on Merced’s reinsurance
22 contracts. (Second Status Report, filed September 14, 2021, p. 4.) The reinsurance programs have
23 been exhausted except for recoveries on individual claims greater than \$1,000,000 but less than
24 \$4,000,000. (*Ibid.*) The CLO Reinsurance Department reports that no additional recovery is
25 expected as there are no known individual claims for losses greater than \$1,000,000. (*Ibid.*)

26 **E. Statement of Assets and Liabilities for the Merced estate**

27 The Statement of Assets and Liabilities for the Merced estate as of September 30, 2024,
28 shows that the Merced estate has cash balances or cash equivalent assets of \$8,427,300 as well as

1 \$59,600 in accrued investment income. (Index, Ex. D [Merced Statement of Assets and Liabilities
2 as of September 30, 2024].) (*Ibid.*) In sum, the Merced estate has \$8,486,900 in estimated total
3 assets as of September 30, 2024. (*Ibid.*)

4 Additionally, the Statement of Assets and Liabilities shows total estimated liabilities of
5 \$633,800. (Index, Ex. D.) All Class 2 liabilities (CIGA claim and all other approved unpaid
6 policyholder class claims) of \$26,953,300 have been paid in full through court-approved
7 distributions. (*Ibid.*) In addition, the Statement of Assets and Liabilities reports \$213,600 in pre-
8 liquidation claims, \$50,000 in estimated state and federal government claims, and \$370,200 in
9 both the general creditor and equity classes combined. (*Ibid.*) Together, the assets and liabilities
10 result in a net asset position of \$7,853,100. (*Ibid.*)

11 The Statement of Assets and Liabilities also reflects the Commissioner's payments of
12 \$692,196 in liquidation fees and expenses for the period November 1, 2022, through September
13 30, 2024. Insurance Code sections 1035 and 1036 authorize payment of liquidation fees and
14 expenses from an insolvent estate, subject to the court's approval. Such fees and expenses for
15 these purposes are entitled to Class 1 priority status over and above all other expenses of the
16 estate. (§ 1033, subd. (a)(1).)

17 **III. THE COMMISSIONER'S ONGOING ACTIVITIES**

18 **A. Administration of the Merced estate**

19 CLO's Information Technology (IT), Finance & Accounting (Accounting), and Claims⁶
20 Departments have continued to provide the necessary services and management of their
21 respective operational areas. These Departments, together with the Estate Trust staff, have
22 worked to position the Merced estate to be ready for final disbursement to approved creditors and
23 to be closed thereafter.

24 The IT Department continued its routine technical assistance in updating and maintaining
25 historical claims databases (loss and adjustment files) and contemporary electronic data files.
26 The IT Department will continue to provide essential monthly support through the final
27

28 ⁶ CLO's Claims Department is responsible for handling non-CIGA covered claims.

1 disbursement of Merced assets to creditors. Thereafter, it will work on final system requirements
2 (decommissioning) and data retention in anticipation of the estate's closure.

3 The Accounting Department has prepared all entries, schedules and work papers for the
4 estate and has routinely reconciled all cash receipts and estate disbursements over the last two
5 years. Working towards the estate's closure, the Accounting Department will continue to manage
6 any remaining financial reports for the estate and prepare and issue the final distribution
7 payments to approved creditors. Additionally, the Accounting Department will conduct a final
8 independent review of Merced's financial statements by the CLO's independent auditors as well
9 as monitor the preparation and filing of the estate's final tax return. (*Ibid.*)

10 The Claims Department has recently been the primary resource in positioning the estate for
11 a final distribution of its assets and closure of the estate. It has reviewed and determined all timely
12 received POCs. The Claims Department has also completed all notifications and follow-up
13 actions to properly resolve any open POCs. It served as a constant resource of support for CIGA
14 throughout the estate's liquidation. Subject to this court's approval, the Claims Department will
15 monitor the estate's final distribution and will be available to assist any of the creditors with any
16 issues associated with their claim payments.

17 **B. Completion of claim validation and resolution**

18 As previously mentioned, CIGA's claim against the Merced estate has been satisfied in full
19 as of September 30, 2024. CIGA reported one open claim that had extenuating circumstances, so
20 the estate has agreed to allow CIGA to retain a modest \$6,000 reserve to address any remaining
21 policy exposure. As such, the estate has completed the settlement of CIGA's Class 2 POC. All
22 other approved Class 2 claims obligations have also been paid in full.

23 As discussed above, the Claims Department has negotiated a final federal release and
24 waiver from the U.S. Department of Justice, thereby resolving the federal government's Class 3
25 claim with no claim payment due from the estate. (Index, Ex. F.) Obtaining the final federal
26 release and waiver agreement required Merced to incur unanticipated legal costs and delays
27 necessary to secure the federal release, but the agreement does not include any claim exposure,
28

1 thus the \$50,000 reserve established by the estate will be written off. The estate must obtain the
2 Court's approval of the executed federal agreement in order to release the Commissioner from
3 any personal liability due to any potential super-priority claims brought by the federal
4 government. After the estate receives approval of the executed federal release and waiver
5 agreement, the approved Class 7 general creditors and Class 8 equity claims, filed by Merced
6 certificate of contribution holders who represent a group of unsecured creditors who are due
7 principal and interest payments, will then be paid through the estate's final distribution of assets.

8 Lastly, the Claims Department will continue to provide outreach and assistance to
9 individual claimants through the final distribution of estate assets. As previously reported, this
10 activity will increase in volume when the estate releases the final distribution of its assets.

11 **C. 2022 and 2023 Tax Returns**

12 Merced is a corporation organized and existing under the laws of the State of California,
13 and it is part of a mutual holding group structure domiciled in Idaho. (First Status Report, filed
14 August 7, 2019, p. 6.) The parent of the mutual holding group is United Heritage Mutual Holding
15 Company who owns 100 percent of the stock of United Heritage Financial Group, who in turn
16 owns 100 percent of the stock of Merced. (*Ibid.*) As part of the United Heritage mutual holding
17 group, Merced prepares its tax returns in accordance with the group's tax sharing agreement.
18 (*Ibid.*) As such, Merced prepared its 2022 and 2023 proforma returns in accordance with the
19 group's agreement and was included as part of the group's consolidated tax filings. Merced will
20 prepare its 2024 proforma tax return for inclusion in the group's 2024 consolidated tax return
21 filing. (*Ibid.*)

22 **IV. THE COMMISSIONER'S FINAL DISBURSEMENT OF ASSETS, FEDERAL RELEASE, AND** 23 **CLOSURE OF THE ESTATE**

24 After the Commissioner receives this Court's approval of the executed final release and
25 waiver agreement from the United States Department of Justice releasing the Commissioner, the
26 Deputy Liquidator, and the Merced estate from certain federal super-priority exposure, the estate
27 will then be able to make a final disbursement to all approved Class 7 and 8 creditors. As
28 explained in the concurrently filed Application, the Commissioner seeks the court's approval to

1 make a final disbursement of approximately \$370,203.71 in Merced assets to Class 7 and Class 8
2 creditors with approved claims. (§ 1033, subd. (a)(2); Index, Ex. E [Merced Property & Casualty
3 Detailed Spreadsheet: Merced Final Distribution Calculation.]) This disbursement will consist of:
4 1) \$172,917 for the approved unpaid claims of six Class 7 general creditors, and 2) \$197,286 for
5 the approved unpaid claims of 62 Class 8 certificate of contribution holders.

6 The Merced estate will also seek in its Application authority from this Court to escheat all
7 unclaimed funds currently held by the estate to the California State Treasurer's office. The estate
8 reports approximately \$213,600 in unclaimed funds. If the estate cannot locate the claimants prior
9 to closure of the estate, these funds will be escheated to the California State Treasurer. (*Ibid.*)

10 The Commissioner will also seek to retain \$350,000 from the \$8,486,900 in cash or cash
11 equivalent assets of the Merced estate as a closing reserve for the payment of projected future
12 administrative expenses incurred after September 2024 and any further disbursements as required
13 by law. (Index, Exs. D & E.) The reserve of \$350,000 is intended to provide for all administrative
14 expenses through the closing of the estate.

15 After payment of the expenses of administration, disbursement of all court-approved open
16 claims, escheatment of unclaimed funds, and retention of a closing reserve, the Merced estate
17 intends to remit payment of all remaining net assets to United Heritage Financial Group, the
18 parent and owner of Merced Property and Casualty Insurance Company. Pursuant to section
19 1033, subdivision (a)(9), the Merced estate will have sufficient assets to make a distribution to
20 Class 9 "shareholder or other owners in any residual value in the estate." The Commissioner
21 seeks authority to remit the balance of estate assets to Merced's parent company because it is a
22 Class 9 claimant and is entitled to a distribution of the residual value of the estate. The
23 Commissioner anticipates this will be the estate's final act before the Merced estate is closed and
24 its liquidation completed.

25 The Merced estate will work to accomplish all of this distribution and closure work by June
26 30, 2025, subject to court availability and any opposition to the application seeking approval of
27 the final disbursement.
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CONCLUSION

Consistent with his obligations and authority set forth under the Liquidation Order, the Commissioner continues to conduct a diligent and efficient liquidation of Merced. The final status report is intended to inform the Court of the Commissioner’s completed and ongoing operations as well as support the concurrently filed Application.

Dated: February 20, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
LISA CHAO
Supervising Deputy Attorney General

CAROLINE C. LAM
Deputy Attorney General
*Attorneys for Applicant Insurance
Commissioner of the State of California*

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DECLARATION OF SERVICE BY ELECTRONIC MAIL

Case Name: **Insurance Commissioner of the State of California v. Merced Property & Casualty Co.**

Case No.: **18CV-04739**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service.

On February 21, 2025, I served the attached **FINAL STATUS REPORT OF INSURANCE COMMISSIONER ON THE LIQUIDATION OF MERCED PROPERTY & CASUALTY COMPANY** by transmitting a true copy via electronic mail, addressed as follows:

Jeffrey D. Neumeyer, Esq.
Sr. Vice President, General Counsel and
Corporate Secretary
United Heritage Financial Group
Email to jneumeyer@unitedheritage.com

Brad Roeber
Executive Director
California Insurance Guarantee Association
Email to roeberb@ciga.org

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 21, 2025, at Los Angeles, California.

Gail Agcaoili

Declarant

/s/ Gail Agcaoili

Signature