

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KAMALA D. HARRIS
Attorney General of California
DIANE S. SHAW
STEPHEN LEW
Supervising Deputy Attorneys General
LISA W. CHAO
Deputy Attorney General
State Bar No. 198536
300 South Spring Street, Room 1702
Los Angeles, California 90013
Telephone: (213) 897-2481
Fax: (213) 897-5775
E-mail: Lisa.Chao@doj.ca.gov

*Attorneys for Applicant
Insurance Commissioner of the State of California,
as Liquidator of Fremont Indemnity Company*

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 15 2015

Sherri R. Carter, Executive Officer/Clerk
By: Robin Sanchez, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CENTRAL CIVIL WEST

INSURANCE COMMISSIONER OF THE
STATE OF CALIFORNIA,

Applicant,

v.

FREMONT INDEMNITY COMPANY,

Respondent.

CASE NO. BS083582

**NOTICE OF HEARING OF ELEVENTH
VERIFIED APPLICATION FOR ORDER
APPROVING LIQUIDATOR'S
PROPOSAL TO DISBURSE ASSETS TO
STATE INSURANCE GUARANTEE
ASSOCIATIONS OR FUNDS [INS. CODE
§ 1035.5]**

Date: June 15, 2015
Time: 2:00 p.m.
Dept.: CCW-322
Judge: Honorable William Highberger

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:


PLEASE TAKE NOTICE that Applicant Insurance Commissioner of the State of California, in his capacity as the Liquidator (“Liquidator”) of Fremont Indemnity Company, will and hereby does apply to the Court for an Order Approving Liquidator’s Proposal to Disburse Assets to State Insurance Guarantee Associations or Funds on June 15, 2015, at 2:00 p.m. in Department 322 of the Los Angeles County Superior Court, Central Civil West Courthouse, located at 600 S. Commonwealth Avenue, Los Angeles, California.

The Liquidator is concurrently filing and serving with this notice his Eleventh Verified Application for Approving Liquidator’s Proposal to Disburse Assets to State Insurance Guarantee Associations or Funds pursuant to California Insurance Code section 1035.5. The Liquidator seeks an order for authority to disburse \$13,910,535 to state Insurance Guarantee Associations pursuant to the distribution plan previously approved by the Court and further granting such other relief as prayed for in the application for said Order.

Said application is based upon this notice, the memorandum of points and authorities attached to the application, the records and files of this case, and other oral or documentary evidence which may be presented at the hearing of said application.

Dated: May 15, 2015

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
DIANE S. SHAW
STEPHEN LEW
Supervising Deputy Attorneys General



LISA W. CHAO
Deputy Attorney General
*Attorneys for the Insurance Commissioner
of the State of California, in his capacity as
Liquidator of Fremont Indemnity Company*

LA2003CV0857
51777848.doc

1 KAMALA D. HARRIS
Attorney General of California
2 DIANE S. SHAW
STEPHEN LEW
3 Supervising Deputy Attorneys General
LISA W. CHAO
4 Deputy Attorney General
State Bar No. 198536
5 300 South Spring Street, Room 1702
Los Angeles, California 90013
6 Telephone: (213) 897-2481
Fax: (213) 897-5775
7 E-mail: Lisa.Chao@doj.ca.gov

RECEIVED

Date MAY 15 2015
Department 322

*Attorneys for Applicant
Insurance Commissioner of the State of California,
as Liquidator of Fremont Indemnity Company*

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF LOS ANGELES

12 CENTRAL CIVIL WEST

13
14 INSURANCE COMMISSIONER OF THE
STATE OF CALIFORNIA,

CASE NO. BS083582

15 Applicant,

**[PROPOSED] ORDER APPROVING
LIQUIDATOR'S PROPOSAL TO
DISBURSE ASSETS TO STATE
INSURANCE GUARANTEE
ASSOCIATIONS OR FUNDS [INS. CODE
§ 1035.5]**

16 v.

17 FREMONT INDEMNITY COMPANY,

18 Respondent.

19 Date: June 15, 2015
20 Time: 2:00 p.m.
21 Dept.: CCW-322
22 Judge: Honorable William Highberger

1 The Eleventh Verified Application for Order Approving Liquidator's Proposal to Disburse
2 Assets to State Insurance Guarantee Associations or Funds of the Insurance Commissioner of the
3 State of California, in his capacity as Liquidator of Fremont Indemnity Company ("Liquidator"),
4 was heard in Department 322 of the above-entitled court, on June 15, 2015, at 2:00 p.m., the
5 Honorable William Highberger, presiding. Having read and considered the Application, the
6 Memorandum of Points and Authorities submitted in support thereof and, argument having been
7 heard and good cause appearing,

8 IT IS HEREBY ORDERED that:

- 9 1. The Application is granted;
- 10 2. The Liquidator is authorized to disburse \$13,910,535 of the assets of Fremont
11 Indemnity Company in liquidation to the state insurance guarantee associations or funds, subject
12 to final adjustments of the disbursement amount; and
- 13 3. The Liquidator is authorized to take any and all action necessary to accomplish the
14 purposes of this Order.

15
16
17
18 Dated: _____

The Honorable William Highberger
Judge of the Superior Court

19
20
21
22
23
24
25 LA2003CV0857
51777849.docx

CONFORMED COPY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KAMALA D. HARRIS
Attorney General of California
DIANE S. SHAW
STEPHEN LEW
Supervising Deputy Attorneys General
LISA W. CHAO
Deputy Attorney General
State Bar No. 198536
300 South Spring Street, Room 1702
Los Angeles, California 90013
Telephone: (213) 897-2481
Fax: (213) 897-5775
E-mail: Lisa.Chao@doj.ca.gov
Attorneys for Applicant
Insurance Commissioner of the State of California,
as Liquidator of Fremont Indemnity Company

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 15 2015

Sherril R. Carter, Executive Officer/Clerk
By: Robin Sanchez, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CENTRAL CIVIL WEST

INSURANCE COMMISSIONER OF THE
STATE OF CALIFORNIA,

Applicant,

v.

FREMONT INDEMNITY COMPANY,

Respondent.

CASE NO. BS083582

**ELEVENTH VERIFIED APPLICATION
FOR ORDER APPROVING
LIQUIDATOR'S PROPOSAL TO
DISBURSE ASSETS TO STATE
INSURANCE GUARANTEE
ASSOCIATIONS OR FUNDS [INS. CODE
§ 1035.5]; MEMORANDUM OF POINTS
& AUTHORITIES IN SUPPORT
THEREOF**

Date: June 15, 2015
Time: 2:00 p.m.
Dept.: CCW-322
Judge: Honorable William Highberger

I.

INTRODUCTION

Pursuant to California Insurance Code section 1035.5, the Insurance Commissioner of the State of California (“Liquidator”), in his capacity as the Liquidator of Fremont Indemnity Company (“Fremont”), seeks the Court’s approval of his proposal to disburse a portion of the Fremont liquidation estate’s assets to the California Insurance Guaranty Association (“CIGA”) and to insurance guaranty associations that perform similar functions in the other states in which Fremont conducted its workers’ compensation business (collectively, the “IGAs”). The Liquidator proposes to disburse approximately \$13,910,535 to the IGAs in accordance with their estimated reported losses from January 1, 2014 through December 31, 2014, as specified in the distribution schedule attached to the application as Exhibit A.

II.

VERIFIED APPLICATION

Applicant, the Insurance Commissioner of the State of California, in his capacity as Liquidator of Fremont Indemnity Company states as follows:

1. On June 4, 2003, the Los Angeles County Superior Court ordered and appointed the Commissioner to serve as Conservator of Fremont.

2. On July 2, 2003, the same court found that Fremont was insolvent and, on that basis, terminated the Commissioner’s status as Conservator and appointed the Commissioner to serve as the Liquidator of Fremont. The entry of the Liquidation Order triggered the duty of the IGAs to pay all covered policyholder claims in accordance with the IGAs’ respective statutes.

3. California Insurance Code section 1035.5 provides in relevant portion that:

“Notwithstanding the provisions of Article 14 (commencing with Section 1010), with regard only to those insurers subject to this article:

“(a) Within 120 days of the issuance of an order directing the winding up and liquidation of the business of an insolvent insurer under Section 1016, the commissioner shall make application to the court for approval of a proposal to

1 disburse the insurer's assets, from time to time as such assets become available, to
2 the California Insurance Guarantee Association, or the California Life and Health
3 Insurance Guarantee Association, and to any entity or person performing a similar
4 function in another state.

5 “(b) The proposal shall at least include the following provisions for:

6 “(1) Reserving amounts for the payment of expenses of administration and
7 the payment of claims of secured creditors (to the extent of the value of the
8 security held) and claims falling within the priorities established in paragraphs (1)
9 to (4), inclusive, of subdivision (a) of Section 1033.

10 “(2) Disbursement of the assets marshaled to date and subsequent
11 disbursements of assets as they become available.

12 “(3) Equitable allocation of disbursements to each of the associations
13 entitled thereto.

14 “(4) The securing by the commissioner from each of the associations
15 entitled to disbursements pursuant to this section of an agreement to return to the
16 commissioner such assets previously disbursed as may be required to pay claims
17 of secured creditors and claims falling within the priorities established in
18 paragraphs (1) to (5), inclusive, of subdivision (a) of Section 1033 in accordance
19 with the priorities. No bond shall be required of any association.

20 “(5) A full report to be made by the association to the commissioner
21 accounting for all assets so disbursed to the association, all disbursements made
22 therefrom, any interest earned by the association on the assets, and any other
23 matter as the court may direct.

24 “(c) The commissioner's proposal shall provide for disbursements to the
25 associations in amounts estimated at least equal to the claim payments made by
26 the associations for which such associations could assert a claim against the
27 commissioner, and shall further provide that if the assets available for
28

1 disbursement from time to time do not equal or exceed the amount of the claim
2 payments made by the associations, then disbursements shall be in the amount of
3 available assets. The reserves of the insolvent insurer on the date of the order of
4 liquidation shall be used for purposes of determining the pro rata allocation of
5 funds among eligible associations.

6 “(d) The commissioner shall offset the amount disbursed to any entity or
7 person performing a function in any other state similar to that function performed
8 by the California Insurance Guarantee Association, or the California Life and
9 Health Insurance Guarantee Association, by the amount of any statutory deposit,
10 premiums, or any other asset of the insolvent insurer held in that state.

11 “(e) Notice of such application shall be given to the associations in and to
12 the commissioners of insurance of each of the states. Any such notice shall be
13 deemed to have been given when deposited in the United States certified mails,
14 first-class postage prepaid, at least 30 days prior to submission of such application
15 to the court. Action on the application may be taken by the court provided the
16 above required notice has been given and provided further that the commissioner's
17 proposal complies with paragraphs (1) and (4) of subdivision (b).”

18 **PLAN APPROVAL AND PRIOR DISTRIBUTIONS**

19 4. On December 3, 2004, the Court approved the plan proposed by the Liquidator
20 for the early distribution of Fremont’s assets to the IGAs as required under Insurance Code
21 section 1035.5 (the “Plan”). Pursuant to the Plan, each IGA will receive an early access
22 distribution equal to a percentage of an amount based on the ratio of the IGA’s paid losses
23 (which includes the amount of paid “allocated loss adjustment expense,” or ALAE, on specific
24 claims) to the total of all IGAs’ paid losses (including ALAE). Statutory deposits will be netted
25 from each IGA’s share to ensure that the allocation of the early access distribution remains
26 equitably proportionate to each IGA’s respective share of Fremont’s aggregate claim payment
27 liability. Under the Plan, the Liquidator also agreed to maintain a \$60 million reserve, subject to
28

1 periodic adjustment, to cover items listed in Insurance Code section 1035.5, subdivision (b)(1)
2 (the "Reserve").

3 5. The Court further approved the first distribution by the Liquidator from Fremont's
4 assets to the IGAs for claim payment activity reported by the IGAs from July 2, 2003, through
5 June 30, 2004. On December 14, 2004, the Liquidator disbursed Fremont's assets in the
6 aggregate amount of \$49,224,224 to the IGAs based on claim losses reported to the Liquidator,
7 after offsetting statutory deposits and other assets that were turned over to the IGAs upon
8 Fremont's insolvency.

9 6. On July 7, 2005, the Court approved a second distribution of Fremont's assets to
10 the IGAs for claim payment activity reported by the IGAs from July 1, 2004, through December
11 31, 2004. Pursuant to the Court's approval, the Liquidator disbursed Fremont's assets in the
12 aggregate amount of \$36,934,280 to the IGAs based on claim losses reported to the Liquidator,
13 after offsetting statutory deposits and other assets that were turned over to the IGAs upon
14 Fremont's insolvency.

15 7. On June 11, 2006, the Court approved a third distribution of Fremont's assets to
16 the IGAs for claim payment activity reported by the IGAs from January 1, 2005, through
17 December 31, 2005. Pursuant to the Court's approval, the Liquidator disbursed Fremont's assets
18 in the aggregate amount of \$168,063,039 to the IGAs based on claim losses reported to the
19 Liquidator, after offsetting statutory deposits and other assets that were turned over to the IGAs
20 upon Fremont's insolvency.

21 8. On August 3, 2007, the Court approved a fourth distribution of Fremont's assets to
22 the IGAs for claim payment activity reported by the IGAs from January 1, 2006, through
23 December 31, 2006. Pursuant to the Court's approval, the Liquidator disbursed Fremont's assets
24 in the aggregate amount of \$144,007,213 to the IGAs based on claim losses reported to the
25 Liquidator, after offsetting statutory deposits and other assets that were turned over to the IGAs
26 upon Fremont's insolvency.

27 ///

1 9. On June 11, 2008, the Court approved a fifth distribution of Fremont's assets to the
2 IGAs for claim payment activity reported by the IGAs from January 1, 2007, through December
3 31, 2007. Pursuant to the Court's approval, the Liquidator disbursed Fremont's assets in the
4 aggregate amount of \$49,675,212 to the IGAs based on claim losses reported to the Liquidator,
5 after offsetting statutory deposits and other assets that were turned over to the IGAs upon
6 Fremont's insolvency.

7 10. On October 5, 2009, the Court approved a sixth distribution of Fremont's assets to
8 the IGAs for claim payment activity reported by the IGAs from January 1, 2008, through
9 December 31, 2008. Pursuant to the Court's approval, the Liquidator disbursed Fremont's assets
10 in the aggregate amount of \$50,000,000 to the IGAs based on claim losses reported to the
11 Liquidator, after offsetting statutory deposits and other assets that were turned over to the IGAs
12 upon Fremont's insolvency.

13 11. On October 17, 2011, the Court approved a seventh distribution of Fremont's
14 assets to the IGAs for claim payment activity reported by the IGAs from January 1, 2009, through
15 December 31, 2010. Pursuant to the Court's approval, the Liquidator disbursed Fremont's assets
16 in the aggregate amount of \$39,905,597.00 to the IGAs based on claim losses reported to the
17 Liquidator, after offsetting statutory deposits and other assets that were turned over to the IGAs
18 upon Fremont's insolvency.

19 12. On August 7, 2012, the Court approved the eighth early access of Fremont's assets
20 to the IGA's for claim payment activity reported by the IGAs from January 1, 2011, through
21 December 31, 2011. Pursuant to the Court's approval, the Liquidator distributed assets in the
22 aggregate amount of \$39,617,203 to the IGAs based on claim losses reported to the Liquidator,
23 after offsetting statutory deposits and other assets that were turned over to the IGAs upon
24 Fremont's insolvency.

25 13. On August 26, 2013, the Court approved the ninth early access of Fremont's assets
26 to the IGA's for claim payment activity reported by the IGAs from January 1, 2012, through
27 December 31, 2012. Pursuant to the Court's approval, the Liquidator distributed assets in the
28

1 aggregate amount of \$25,564,790 to the IGAs based on claim losses reported to the Liquidator,
2 after offsetting statutory deposits and other assets that were turned over to the IGAs upon
3 Fremont's insolvency.

4 14. On June 9, 2014, the Court approved the tenth early access of Fremont's assets to
5 the IGA's for claim payment activity reported by the IGAs from January 1, 2013, through
6 December 31, 2013. Pursuant to the Court's approval, the Liquidator distributed assets in the
7 aggregate amount of \$25,426,592 to the IGAs based on claim losses reported to the Liquidator,
8 after offsetting statutory deposits and other assets that were turned over to the IGAs upon
9 Fremont's insolvency.

10 **ADJUSTMENT TO RESERVE**

11 15. As part of the Court's approval of the early access distribution plan on December
12 3, 2004, the Liquidator proposed to set aside a reserve of \$60 million, subject to periodic
13 adjustments to ensure that the reserve is neither too great nor too small for the proper and
14 equitable administration of the estate and the protection of claimants. The Liquidator further
15 agreed to advise the Court of future changes in the reserve at the time he files his Notices of
16 Proposed Early Access Distribution.

17 16. In 2008, the Liquidator advised the Court that a reserve of \$30 million was
18 sufficient. In 2009, the Liquidator determined that it was necessary to increase the Reserve to
19 \$60 million, pending the completion and approval of a plan to effect a taxpayer deconsolidation
20 of the estate from the consolidated taxpayer group of Fremont's former parent company, Fremont
21 General Corporation. After making the early access distribution in 2014, the Fremont estate had
22 approximately \$55.1 million in available reserves set aside.

23 **LIMITATIONS ON DISTRIBUTION**

24 17. The estate also implemented limitations on future early access distributions to
25 avoid over-distribution to certain IGAs and in consideration of the funds that ultimately will be
26 required for an equitable distribution to other non-IGA Class 2 claimants, who were not entitled
27 to early access distribution but are entitled to equal claim treatment. As of March 31, 2015, the
28

1 estate has set aside \$3.64 million in approved claims and \$23.36 million as a reserve to address
2 the non-IGA Class 2 claims that have yet to be determined.

3 18. Prior to 2009, the IGAs were reimbursed for all paid claims and related expenses at
4 percentages between 85-100%. However, several years ago the Liquidator settled all major
5 litigation involving this estate. In addition, the Liquidator has continued to administer and
6 monitor the adjustment of Uncovered Claims that will eventually share in future distributions *pari*
7 *passu* with the IGAs. Based on the settlements and developments in adjusting and estimating the
8 amount of the estate's potential liability on Uncovered Claims, the Liquidator determined that the
9 estimated final distribution to Class 2 participants, including both IGAs and Uncovered Claims,
10 will be in the range of 40-50%. This analysis caused the Liquidator to change the method used to
11 make early access distributions to participating IGAs.

12 19. The Liquidator has established a distribution cap based on each IGA's total
13 incurred losses. The Liquidator will not make a distribution to an IGA that will cause its
14 aggregate distributions to exceed its total paid losses to date. Due to favorable asset collections
15 from reinsurance and non-adverse development of claims liabilities, the Liquidator has increased
16 the distribution cap to 46% of the IGAs' total incurred losses.

17 THE PROPOSED 2015 DISTRIBUTION

18 20. After the IGAs reported to the Liquidator their claim payment activity for the
19 period January 1, 2014 through December 31, 2014, and after the Liquidator applied the protocol
20 described in paragraphs 19 above, the Liquidator determined that \$13.9 million is an appropriate
21 Early Access Distribution for 2015. The specific amount anticipated to be paid to each
22 participating IGA is provided in the schedule attached as Exhibit A hereto and incorporated
23 herein by this reference.

24 20. As of March 31, 2015, the Fremont estate has cash assets of \$67,728,800. After
25 making the proposed 2015 Early Access Distribution of \$13.9 million, the Fremont estate will
26 have an available pool of approximately \$53.8 remaining as a reserve for liabilities referenced in
27 Insurance Code section 1035.5, subdivision (b)(1).

28

1 21. Finally, as required by Insurance Code section 1035.5, subdivisions (b)(4) and
2 (b)(5), each IGA receiving a distribution has signed an Agreement for Early Access Distribution
3 of Funds, which obligates the IGA to return to the Fremont estate any portion of an early access
4 distribution that exceeds the IGA's ratable share of the ultimate Class 2 distributions from the
5 liquidation estate. The agreements govern this distribution and each subsequent early access
6 distribution of assets from the Fremont estate.

7 WHEREFORE, the Liquidator prays that this Application be heard and granted, and that

8 1. Authorizing the Liquidator to disburse approximately \$13.9 million from the assets
9 of Fremont Indemnity Company to the IGAs, subject to final adjustments of the disbursement
10 amount; and

11 2. Authorizing the Liquidator to take any and all action necessary to accomplish the
12 purposes of the Order prayed for herein.

13
14 Dated: May 15, 2015

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
DIANE S. SHAW
STEPHEN LEW
Supervising Deputy Attorneys General

15
16
17
18 


19 LISA W. CHAO
20 Deputy Attorney General
21 *Attorneys for the Insurance Commissioner*
22 *of the State of California, in his capacity as*
23 *Liquidator of Fremont Indemnity Company*

VERIFICATION

I, Scott D. Pearce, state that I am a Senior Estate Trust Officer with the California Insurance Commissioner's Conservation and Liquidation Office and have overall responsibility for the liquidation of Fremont Indemnity Company. I have read the ELEVENTH VERIFIED APPLICATION FOR ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS; and know the contents thereof. The statements contained therein are not all within my personal knowledge, and I am informed that no single officer of the Conservation and Liquidation Office has personal knowledge of all these matters. The statements are based upon information assembled by employees authorized to maintain and analyze the records of Fremont Indemnity Company in liquidation. I am informed and believe that the statements based upon that information are true. As those matters that are within my own personal knowledge, the statements herein are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California on 12th day of May, 2015.



Scott D. Pearce

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 California Insurance Code section 1035.5 states the procedural requirements regarding the
3 disbursement of an insolvent insurer's assets. The following sets forth the responsibility of the
4 Insurance Commissioner of the State of California, in his capacity as the Liquidator (the
5 "Liquidator") of Fremont Indemnity Company, to apply for the disbursements to the California
6 Insurance Guarantee Association and the Insurance Guarantee Associations in other states
7 (collectively "IGAs"):

8 Within 120 days of the issuance of an order directing the winding up and
9 liquidation of the business of an insolvent insurer under Section 1016, the
10 commissioner shall make application to the court for approval of a proposal to
11 disburse the insurer's assets, from time to time as such assets become available, to
12 the California Insurance Guarantee Association, or the California Life and Health
13 Insurance Guarantee Association, and to any entity or person performing a similar
14 function in another state.

15 (Ins. Code, § 1035.5, subd. (a).)

16 California and other states have similar requirements regarding the handling of assets of
17 insolvent insurers that require the equitable distribution of an insolvent insurer's assets among all
18 IGAs. (Ins. Code, § 1033, subd. (a); *Commercial Nat'l Bank v. Superior Court (Garamendi)*
19 (1993) 14 Cal.App.4th 393, 398 [finding that claimants within same class are entitled to share pro
20 rata in distribution to class].)

21 As required under Insurance Code section 1035.5(b)(1), the Liquidator has established a
22 reasonable plan to reserve assets to pay secured claims and the higher or ratable priority
23 disbursement required under Insurance Code section 1033(a). Therefore, the Liquidator should
24 be allowed to make his proposed early access distribution of approximately \$13.9 million to the
25 IGAs.

26 ///

27 ///

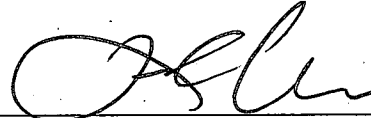
28

1 Based on the foregoing, the Liquidator respectfully requests that the Court grant the
2 application and approve the proposal to disburse assets to state Insurance Guarantee Associations.

3
4 Dated: May 15, 2015

Respectfully submitted,

5 KAMALA D. HARRIS
6 Attorney General of California
7 DIANE S. SHAW
8 STEPHEN LEW
9 Supervising Deputy Attorneys General

10 

11 LISA W. CHAO
12 Deputy Attorney General
13 *Attorneys for the Insurance Commissioner*
14 *of the State of California, in his capacity as*
15 *Liquidator of Fremont Indemnity Company*

16
17
18
19
20
21
22
23
24
25
26
27
28
LA2003CV0857
51777263.doc

Exhibit “A”

Exhibit A

Fremont Indemnity Company

Proposed 11th Early Access Distribution to Insurance Guaranty Associations

June 2015

<u>Insurance Guaranty Associations</u>	<u>Proposed Distribution</u>
Alabama Insurance Guaranty Association	\$49,850.00
California Insurance Guarantee Association	\$4,887,542.99
Colorado Insurance Guarantee Association	\$201,304.24
District of Columbia Insurance Guaranty Association	\$52,198.00
Georgia Insurance Insolvency Pool	\$520,284.63
Idaho Insurance Guarantee Association	\$192,712.55
Kentucky Insurance Guaranty Association	\$113,557.00
North Carolina Insurance Guaranty Association	\$101,864.52
New Jersey Workers' Compensation Security Fund	\$6,485,252.12
Nevada Insurance Guaranty Association	\$11,462.39
Oklahoma Property & Casualty Insurance Guaranty Association	\$7,125.22
Pennsylvania Workers' Compensation Security Fund	\$124,997.38
Tennessee Insurance Guaranty Association	\$6,288.46
Utah Property & Casualty Insurance Guaranty Association	\$600,655.53
Virginia Property & Casualty Insurance Guaranty Association	\$58,307.00
Vermont Property & Casualty Insurance Guaranty Association	\$69,961.43
Wisconsin Insurance Security Fund	\$427,171.54
	<hr/>
	\$13,910,535.00

CONFORMED COPY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KAMALA D. HARRIS
Attorney General of California
DIANE S. SHAW
STEPHEN LEW
Supervising Deputy Attorneys General
LISA W. CHAO
Deputy Attorney General
State Bar No. 198536
300 South Spring Street, Room 1702
Los Angeles, California 90013
Telephone: (213) 897-2481
Fax: (213) 897-5775
E-mail: Lisa.Chao@doj.ca.gov
Attorneys for Applicant
Insurance Commissioner of the State of California,
as Liquidator of Fremont Indemnity Company

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAY 15 2015

Sherri R. Carter, Executive Officer/Clerk
By: Robin Sanchez, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CENTRAL CIVIL WEST

INSURANCE COMMISSIONER OF THE
STATE OF CALIFORNIA,

Applicant,

v.

FREMONT INDEMNITY COMPANY,

Respondent.

CASE NO. BS083582

PROOF OF SERVICE

Date: June 15, 2015
Time: 2:00 p.m.
Dept.: CCW-322
Judge: Honorable William Highberger

DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL
(Separate Mailings)

Case Name: **Insurance Commissioner v. Fremont Indemnity Company**

No.: **BS083582**

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. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On May 15, 2015, I served the attached **1. NOTICE OF HEARING OF ELEVENTH VERIFIED APPLICATION FOR ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS [INS. CODE § 1035.5], 2. [PROPOSED] ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS [INS. CODE § 1035.5], 3. ELEVENTH VERIFIED APPLICATION FOR ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS [INS. CODE § 1035.5]; MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT THEREOF; and 4. PROOF OF SERVICE** by placing a true copy thereof enclosed in a sealed envelope as certified mail with return receipt requested, and another true copy of the **1. NOTICE OF HEARING OF ELEVENTH VERIFIED APPLICATION FOR ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS [INS. CODE § 1035.5], 2. [PROPOSED] ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS [INS. CODE § 1035.5], 3. ELEVENTH VERIFIED APPLICATION FOR ORDER APPROVING LIQUIDATOR'S PROPOSAL TO DISBURSE ASSETS TO STATE INSURANCE GUARANTEE ASSOCIATIONS OR FUNDS [INS. CODE § 1035.5]; MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT THEREOF; and 4. PROOF OF SERVICE** was enclosed in a second sealed envelope as first class mail in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on May 15, 2015, at Los Angeles, California.

Linda Richardson
Declarant

Linda Richardson
Signature

SERVICE LIST

Case Name: Insurance Commissioner v. Fremont Indemnity Company
L. A. S. C. Case No.: BS083582

C. Guerry Collins, Esq.
Locke Lord Bissell & Liddell LLP
300 S. Grand Ave., Suite 800
Los Angeles, CA 90071-3200
Fax: 213-485-1200

Joseph E. Thomas
Thomas Whitelaw & Tyler LLP
18101 Von Karman Avenue, Suite 230
Irvine, CA 92612
Fax: 949-679-6405

Dean Hansell, Esq.
Hogan Lovells US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Fax: 310-785-4601

Joel F. Citron, Esq.
Law Offices of Joel F. Citron
3420 Ocean Park Blvd., Suite 3030
Santa Monica, CA 90405
Fax: 310-450-3851

Nicholas Peter Roxborough, Esq.
Roxborough, Pomerance & Nye LLP
5820 Canoga Avenue, Suite 250
Woodland Hills, CA 91367
Fax: 818-992-9991

Paul Woolls, Esq.
H. Douglas Galt, Esq.
Gregory B. Scher
Woolls & Peer
A Professional Corporation
One Wilshire Boulevard, 22nd Floor
Los Angeles, CA 90017
Fax: 213-629-1660

Michael C. Lieb, Esq.
Willenken Wilson Loh & Lieb LLP
707 Wilshire Blvd., Suite 3850
Los Angeles, CA 90017
Fax: 213-955-9250

Linda Dakin-Grimm, Esq.
Milbank, Tweed, Hadley & McCloy LLP
601 South Figueroa Street, 30th Floor
Los Angeles, CA 90017
Fax: 213-629-5063

Russell Hayman, Esq.
G. Jill Basinger, Esq.
McDermont Will & Emry LLP
2049 Century Park East, Suite 3800
Los Angeles, CA 90067-3218
Fax: 310-277-4730

CERTIFIED SERVICE LIST

<p>Betty S. Davis Executive Director Alabama Insurance Guaranty Association 2020 Canyon Road, Suite 200 Birmingham, AL 35216</p>	<p>Susan R. Daniels AIC Fund Administrator Alaska Insurance Guaranty Association c/o Northern Adjusters, Inc. 1401 Rudakof Circle, Suite 100 Anchorage, AK 99508</p>
<p>Michael E. Surguine Executive Director Arizona Insurance Guaranty Funds 1110 West Washington, Suite 270 Phoenix, AZ 85007</p>	<p>Steve A. Uhrynowycz, Esq. Administrator Arkansas Property & Casualty Guaranty Fund 1023 West Capitol Avenue, Suite 2 Little Rock, AR 72201</p>
<p>Wayne D. Wilson Executive Director California Insurance Guarantee Association P. O. Box 29066 Glendale, CA 91209-9066</p>	<p>David C. Edwards President Colorado -Western Guaranty Fund Services 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>
<p>Paul M. Gulko, Esq. President Connecticut -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916</p>	<p>Barbara Cox Vice President & Corporate Secretary National Conference of Insurance Guaranty Funds 300 N. Meridian Street, Suite 1020 Indianapolis, IN 46204</p>
<p>Paul M. Gulko, Esq. President District of Columbia -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916</p>	<p>John J. Falkenbach Executive Director Delaware Insurance Guaranty Association 220 Continental Drive, Suite 309 Newark, DE 19713</p>
<p>Sandra Robinson, President Florida Insurance Guaranty Association P.O. Box 14249 Tallahassee, FL 32317</p>	<p>Sandra J. Robinson, President Florida Workers Compensation Insurance Guaranty Association P.O. Box 15159 Tallahassee, FL 32317</p>
<p>Michael C. Marchman Executive Director Georgia Insurers Insolvency Pool 2177 Flintstone Drive, Suite R Tucker, GA 30084</p>	<p>Blake J. Obata, Administrator Hawaii Insurance Guaranty Association 1001 Bishop Street American Savings Bank Tower, Suite 1160 Honolulu, HI 96813</p>
<p>David C. Edwards President Idaho -Western Guaranty Fund Services 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>	<p>Anne A. Sharp Executive Director Illinois Insurance Guaranty Fund 120 South LaSalle Street, Suite 1910 Chicago, IL 60603</p>

CERTIFIED SERVICE LIST

<p>Janis B. Funk Executive Director Indiana Insurance Guaranty Association 8777 Purdue Road, Suite 360 Indianapolis, IN 46268</p>	<p>Steven M. Augspurger General Counsel Iowa Insurance Guaranty Association 801 Grand Avenue, Suite 3700 Des Moines, IA 50309-8004</p>
<p>David C. Edwards President Kansas -Western Guaranty Fund Services 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>	<p>A. Scott Webster , Executive Director Kentucky Insurance Guaranty Association 10605 Shelbyville Road, Suite 101 Louisville, KY 40222</p>
<p>John Wells Director of Operations & Logistics Louisiana Insurance Guaranty Association 2142 Quail Run Drive Baton Rouge, LA 70808-4126</p>	<p>Paul M. Gulko, Esq. President Maine -Guaranty Fund Management Services One Bowdoin Square Boston MA 02114-2916</p>
<p>Paul M. Gulko, Esq. President Massachusetts -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916</p>	<p>Joseph R. Petr, President Maryland Property & Casualty Insurance Guaranty Corporation 305 Washington Avenue, Suite 600 Towson, MD 21204-4715</p>
<p>Thomas R. Kujawa Executive Director Michigan Property & Casualty Guaranty Association 39810 Grand River Avenue, Suite 120 Novi, MI 48375</p>	<p>Paul Steffen Executive Director Minnesota Insurance Guaranty Association 7600 Parklawn Ave., Suite 460 Edina, MN 55435</p>
<p>Arthur Russell Executive Director Mississippi Insurance Guaranty Assn. 713 South Pear Orchard Road, Suite 200 Ridgeland, MS 39157-4823</p>	<p>Charles F. Renn Executive Director Missouri Property & Casualty Insurance Guaranty Association 994 Diamond Ridge, Suite 102 Jefferson City, MO 65109</p>
<p>David C. Edwards, President Montana -Western Guaranty Fund Services 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>	<p>David C. Edwards, President Nebraska Property & Liability Insurance Guaranty Association 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>
<p>Bruce W. Gilbert Executive Director Nevada Insurance Guaranty Association 3821 W. Charleston Blvd., Suite 100 Las Vegas, NV 89102-1859</p>	<p>Paul M. Gulko, Esq. President New Hampshire -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916</p>

CERTIFIED SERVICE LIST

Joseph L. DellaFera , Executive Director New Jersey Property-Liability Insurance Guaranty Association 233 Mount Airy Road Basking Ridge, NJ 07920	Joseph L. Della Fera, Chief Executive Director New Jersey Workers' Compensation Security Fund 233 Mt. Airy Road Basking Ridge, NJ 07920
Becky Tafoya, Director New Mexico Insurance Guaranty Association c/o Keenan & Associates, Inc. 11501 Montgomery Boulevard, N.E. Albuquerque, NM 87111	Scott D. Fischer Acting Special Deputy Superintendent New York State Insurance Department Liquidation Bureau 110 William Street, 15th Floor New York, NY 10038
Raymond F. Evans, Jr. Managing Secretary North Carolina Insurance Guaranty Association 5401 Six Forks Road Raleigh, NC 27609-4435	Jeffry J. Cahill Managing Secretary North Dakota Insurance Guaranty Association 843 Munich Drive Bismarck, ND 58504
Steve Durish, President Ohio/ West Virginia Insurance Guaranty Association 1840 Mackenzie Drive Columbus, OH 43220	Larry W. Fitch, General Manager Oklahoma Property & Casualty Insurance Guaranty Association 2601 Northwest Expressway, Suite 330E Oklahoma City, OK 73112
David C. Johnson Administrator Oregon Insurance Guaranty Association 10700 Southwest Beaverton Highway, Suite 426 Beaverton, OR 97005-3019	Stephen Perrone, Executive Director Pennsylvania Property & Casualty Insurance Guaranty Association 1617 John F. Kennedy Boulevard One Penn Center, Suite 1850 Philadelphia, PA 19103
Laura S. Keller , Claims Manager Pennsylvania Workers' Compensation Security Fund Pennsylvania Insurance Department Bureau of Special Funds 901 North 7th Street Harrisburg, PA 17102	Andrew F. Wade, Chief Counsel Arizona Workers Compensation Special Fund Industrial Commission of Arizona 800 West Washington Street, Suite 300 Phoenix, AZ 85005
Paul M. Gulko, Esq. President Rhode Island -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916	J. Smith Harrison, Executive Director/Secretary South Carolina Property & Casualty Insurance Guaranty Association 240 Stoneridge Drive One Greystone Building, Suite 101 Columbia, SC 29210

CERTIFIED SERVICE LIST

<p>Edwin E. Evans South Dakota Property & Casualty Insurance Guaranty Association c/o Davenport, Evans, Hurwitz & Smith 206 West 14th Street Sioux Falls, SD, 57104</p>	<p>David Broemel Executive Secretary Tennessee Insurance Guaranty Association 1600 Division Street, Suite 680 Nashville, TN 37203</p>
<p>Marvin Kelly , Executive Director Texas Property & Casualty Insurance Guaranty Association 9120 Burnet Road Austin, TX 78758</p>	<p>Allen Muhlestein, Executive Director Utah Property & Casualty Insurance Guaranty Association 7400 S. Union Park Ave., Suite 201 Midvale, UT 84047</p>
<p>Paul M. Gulko, Esq. President Vermont -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916</p>	<p>Paul M. Gulko, Esq. President Virginia -Guaranty Fund Management Services One Bowdoin Square Boston, MA 02114-2916</p>
<p>David C. Edwards President Washington -Western Guaranty Fund Services 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>	<p>Steve Durish, President West Virginia - Insurance Guaranty Association 1840 Mackenzie Drive Columbus, OH 43220</p>
<p>Randy Blumer Executive Director Wisconsin Insurance Security Funds 2820 Walton Commons West, Suite 135 Madison, WI 53718-6797</p>	<p>David Edwards President Wyoming -Western Guaranty Fund Services 1720 South Bellaire Street, Suite 408 Denver, CO 80222</p>

CERTIFIED SERVICE LIST

<p>Tom C. Hirsig, Commissioner Wyoming Insurance Department 106 East 6th Avenue Cheyenne, Wyoming 82002-0440</p>	<p>Lori K. Wing-Heier, Director Alaska Division of Insurance 550 West 7th Avenue, Suite 1560 Anchorage, Alaska 99501-3567</p>
<p>Jim L. Ridling, Commissioner Alabama Department of Insurance 201 Monroe Street, Suite 502 Montgomery, Alabama 36104</p>	<p>Jay Bradford, Commissioner Arkansas Insurance Department 1200 West Third Street Little Rock, Arkansas 72201-1904</p>
<p>Germanine L. Marks, Director Arizona Department of Insurance 2910 North 44th Street, Suite 210 Phoenix, Arizona 85018-7269</p>	<p>Marguerite Salazar, Commissioner Colorado Division of Insurance 1560 Broadway, Suite 850 Denver, Colorado 80202</p>
<p>Thomas B. Leonardi, Commissioner Connecticut Department of Insurance 153 Market Street, 7th Floor Hartford, Connecticut 06103</p>	<p>Chester A. McPherson, Interim Commissioner Dept. of Insurance & Securities Reg. Government of the District of Columbia 810 First Street, N. E., Suite 701 Washington, DC 20002</p>
<p>Karen Weldin Stewart, Commissioner Delaware Department of Insurance 841 Silver Lake Boulevard Dover, Delaware 19904</p>	<p>Jeff Atwater, Chief Financial Officer Department of Financial Services J. Edwin Larson Building 200 E. Gaines, Street Tallahassee, Florida 32399-0301</p>
<p>Kevin McCarty, Commissioner Office of Insurance Regulation The Larson Building 200 E. Gaines Street, Room 101A Tallahassee, Florida 32399-0301</p>	<p>Ralph T. Hudgens, Commissioner Office of Insurance and Safety Fire Commissioner Two Martin Luther King, Jr. Drive West Tower, Suite 704 Atlanta, Georgia 30334</p>
<p>Gordon I. Ito, Commissioner Hawaii Insurance Division Dept. of Commerce & Consumer Affairs 335 Merchant Street, Room 213 Honolulu, Hawaii 96813</p>	<p>Nick Gerhart, Commissioner Iowa Insurance Division Two Ruan Center 601 Locust, 4th Floor Des Moines, Iowa 50309-3438</p>
<p>William W. Deal, Director Idaho Department of Insurance 700 West State Street, 3rd Floor Boise, Idaho 83720-0043</p>	<p>Andrew Boron, Director Illinois Department of Insurance 320 W. Washington Street Springfield, Illinois 62767-0001</p>
<p>Stephen W. Robertson, Commissioner Indiana Department of Insurance 311 W. Washington Street, Suite 103 Indianapolis, Indiana 46204-2787</p>	<p>Sandy Praeger, Commissioner Kansas Department of Insurance 420 SW 9th Street Topeka, Kansas 66612-1678</p>
<p>Sharon P. Clark, Commissioner Kentucky Department of Insurance 215 West Main Street Frankfort, Kentucky 40601</p>	<p>James J. Donelon, Commissioner Louisiana Department of Insurance 1702 N. 3rd Street Baton Rouge, Louisiana 70802</p>

CERTIFIED SERVICE LIST

Joseph G. Murphy, Commissioner Massachusetts Division of Insurance 1000 Washington Street, 8 th Floor Boston, Massachusetts 02118-6200	Therese M. Goldsmith, Commissioner Maryland Insurance Administration 200 St. Paul Place, Suite 2700 Baltimore, Maryland 21202
Eric A. Cioppa, Superintendent Maine Bureau of Insurance Dept. of Professional & Financial Reg. 34 State House Station Augusta, Maine 04333-0034	Ann Flood, Director Dept. of Insurance and Financial Services Attn: Office of the Commissioner Ottawa Bldg 3rd Floor, 611 W. Ottawa Lansing, Michigan 48933
Mike Rothman, Commissioner Minnesota Department of Commerce 85 7th Place East, Suite 500 St. Paul, Minnesota 55101	John M. Huff, Director Missouri Department of Insurance 301 West High Street, Suite 530 Jefferson City, Missouri 65101
Mike Chaney, Commissioner Mississippi Insurance Department 1001 Woolfolk State Office Building 501 N. West Street Jackson, Mississippi 39201	Monica Lindeen, Commissioner Montana Department of Insurance 840 Helena Avenue Helena, Montana 59601
Wayne Goodwin, Commissioner North Carolina Dept. of Insurance Dobbs Building 430 N. Salisbury Street Raleigh, North Carolina 27603-5926	Adam Hamm, Commissioner North Dakota Dept. of Insurance State Capitol, Fifth Floor 600 E. Boulevard Bismarck, North Dakota 58505-0320
Bruce R. Ramage, Director Nebraska Department of Insurance 941 'O' Street, Suite 400 Lincoln, Nebraska 68508	Roger A. Seigny, Commissioner New Hampshire Insurance Department 21 South Fruit Street, Suite 14 Concord, New Hampshire 03301
Kenneth E. Kobylowski, Commissioner New Jersey Department of Insurance 20 West State Street Trenton, New Jersey 08625-0325	John G. Franchini, Superintendent New Mexico Division of Insurance P.E.R.A. Building 1120 Paseo De Peralta Santa Fe, New Mexico 87501
Scott J. Kipper, Commissioner Nevada Division of Insurance 1818 East College Pkwy, Suite 103 Carson City, Nevada 89706	Benjamin M. Lawskey New York State Dept. of Financial Services One State Street New York, New York 10004-1511
Mary Taylor, Director Ohio Department of Insurance 50 West Town Street Third Floor, Suite 300 Columbus, Ohio 43215	John D. Doak, Commissioner Oklahoma Department of Insurance Five Corporate Plaza 3625 NW 56 th Street, Suite 100 Oklahoma City, Oklahoma 73112
Laura N. Cali, Insurance Commissioner Oregon Insurance Division 350 Winter Street NE Salem, Oregon 97301-3883	Michael F. Consedine, Commissioner Pennsylvania Insurance Department 1326 Strawberry Square Harrisburg, Pennsylvania 17120

CERTIFIED SERVICE LIST

<p>Angela Weyne, Commissioner Puerto Rico Department of Insurance B5 Calle Tabonuco Suite 216 PMB356 Guaynabo, Puerto Rico 00968-3029</p>	<p>Joseph Torti, III, Superintendent Rhode Island Insurance Division Dept. of Business Regulation 1511 Pontiac Avenue, Building 69-2 Cranston, Rhode Island 02920</p>
<p>Raymond G. Farmer, Director South Carolina Dept. of Insurance 1201 Main Street, Suite 1000 Columbia, South Carolina 29201</p>	<p>Merle D. Scheiber, Director South Dakota Division of Insurance Department of Revenue & Regulation 445 East Capitol Avenue Pierre, South Dakota 57501-3185</p>
<p>Julie Mix McPeak, Commissioner Tennessee Dept. of Commerce & Ins. Davy Crockett Tower, Twelfth Floor 500 James Robertson Parkway Nashville, Tennessee 37243-0565</p>	<p>Julia Rathgeber, Commissioner Texas Department of Insurance 333 Guadalupe Street Austin, Texas 78701</p>
<p>Todd E. Kiser, Commissioner Utah Department of Insurance 3110 State Office Building Salt Lake City, Utah 84114-6901</p>	<p>Jacqueline K. Cunningham, Commissioner State Corporation Commission Virginia Bureau of Insurance 1300 East Main Street Richmond, Virginia 23219</p>
<p>Susan L. Donegan, Commissioner Department of Financial Regulation 89 Main Street Montpelier, Vermont 05620-3101</p>	<p>Mike Kreidler, Commissioner Washington State Office of the Insurance Commissioner 5000 Capitol Boulevard, SE Tumwater, Washington 98501</p>
<p>Ted Nickel, Commissioner Office of the Commissioner of Insurance 125 South Webster Street GEF III – Second Floor Madison, Wisconsin 53703-3474</p>	<p>Michael D. Riley, Commissioner West Virginia Dept. of Insurance State of West Virginia 1124 Smith Street Charleston, West Virginia 25301</p>
<p>Tau Tanuvasa, Insurance Commissioner Office of the Governor American Samoa Government A P Lutali Executive Office Building Pago Pago, American Samoa 96799</p>	<p>Artemio B. Ilagan Banking and Insurance Commissioner Department of Revenue & Taxation 1240 Army Drive Barrigada, Guam 96913</p>
<p>Sixto K. Igisomar, Secretary of Commerce Commonwealth of the N Mariana Islands Department of Commerce Office of the Insurance Commissioner Caller Box 10007 CK Saipan, MP 96950</p>	<p>Gregory R. Francis Lt. Governor/Commissioner 5049 Kongens Gade St. Thomas, Virgin Islands 00802</p>