December 1, 2022

VIA EMAIL

The Honorable Ricardo Lara
Insurance Commissioner
State of California
300 Capitol Mall, Suite 1700
Sacramento, CA 95814

Re: Private Passenger Auto Rate Applications of Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange
(CDI File Nos. 22-2254, 22-2255, 22-2256; 22-2254-A, 22-2255-A, 22-2256-A; and 22-2254-B, 22-2255-B, 22-2256-B)

Dear Commissioner Lara:

We write to urge you to reject Farmers’ pending 2022 private passenger auto rate applications\(^1\) seeking an overall $167.8 million (6.9% overall) rate hike impacting 1.7 million insured vehicles. These applications continue Farmers’ discriminatory three-tiered rating system charging low-income workers up to $130 higher base rates for a six-month policy than professionals with advanced degrees. (See Exh. A, attached.) This occupation-based rating system is unfairly discriminatory and illegal under voter-enacted Proposition 103 and the Commissioner’s regulations, which do not allow occupation as a permissible rating factor. (Ins. Code §§ 1861.02, 1861.05.) Farmers should be required to eliminate its use of three separate rate tiers that segment policyholders by occupation, and any proposed rate changes should instead be evaluated using uniform base rates for all policyholders.

Moreover, the Commissioner should notice a public hearing to determine the amount of additional premium overcharges that Farmers has yet to return to California policyholders based on their reduced driving during the period the state’s COVID-19 stay-at-home orders were in effect from at least March 2020 to June 2021. Consumer Watchdog’s analysis shows that Farmers has so far provided premium credits totaling less than half of the amount that the company overcharged customers during that time period, leaving over a hundred million dollars still owed. But to date, you have taken no further action publicly to ensure that Farmers’ policyholders receive the refunds they deserve.

Under Farmers’ current rates, **62% of Farmers customers** (insuring over 1.1 million cars), **including janitors, grocery clerks, and warehouse and restaurant workers** (“Regular Group”), **pay up to 15.5% more for all coverages combined than doctors, dentists, engineers, accountants, and scientists** (“Business and Professional Group I”), all other characteristics being equal. Under Farmers’ proposed rates, **this occupation-based premium gap will widen up to**

\(^{1}\) Publicly noticed on September 30, 2022.
16.9%. In addition, police officers, firefighters, and nurses (“Business and Professional Group II”) currently pay up to 7.3% more for their auto insurance than doctors, dentists, engineers, accountants, and scientists (“Business and Professional Group I”). The lower rates Farmers gives to policyholders in its “Business and Professional Group I” and “Business and Professional Group II” are not based on being a member of any actual organized group, but instead are based solely on being employed in a professional occupation that Farmers has selected. Insurers have never shown that occupational status has a substantial relationship to risk of loss as they would be required to do if this criterion was adopted as a legitimate rating factor under Prop 103.

You last approved Farmers’ discriminatory occupation-based rating system in a December 2019 decision denying Consumer Watchdog’s petition for a hearing on Farmers’ 2019 rate application. At that time, you vowed to address this issue with an industry-wide “regulatory solution”:

Recently, the Commissioner conducted an investigatory hearing regarding the use and impact of such group plans. During the investigatory hearing the Commissioner received evidence that the use of group plans based on education and occupation factors may have an unfairly discriminatory rating impact for certain California consumers, which is prohibited by Insurance Code section 1861.05, subdivision (a). So on December 23, 2019, the Commissioner published an Invitation to Prenotice Public Discussion to explore a possible rulemaking to address any possible unfairly discriminatory rating impact that may result from the use of group plans.

As explained above, the Commissioner has chosen to address on an industry-wide basis concerns about potentially unfairly discriminatory rates due to use of group plans. Proceeding by rulemaking “offers the agency an opportunity to research and develop all relevant arguments from the affected stakeholders and address a problem in a comprehensive way that treats regulated entities in a like manner.” (Association of California Ins. Companies v. Jones (2017) 2 Cal.5th 376, 393-394.) The process commenced with the above-mentioned prenotice public discussion will likely lead to an industry-wide regulatory solution to Petitioner’s allegations regarding Applicants’ use of group rating plans. The Commissioner finds that during the pendency of the public discussions and possible rulemaking it would be inefficient for the Department to adjudicate individual insurers’ existing group plans in individual rate applications, and that such piecemeal adjudication may create further inequities in the market. Therefore, the Commissioner declines to individually address Petitioner’s challenge to Applicants’ existing group plans here. Proceeding by rulemaking rather than case-by-case adjudication here is also consistent with the Commissioner’s past practices. For example, former Commissioner Low chose to address concerns regarding the use of persistency as an optional factor in personal auto rating by way of rulemaking rather than case-by-case adjudication. (See, e.g., In the Matter of the Rates, Rating Plans, or Rating Systems of State Farm Mutual Automobile
The Department’s September 2019 report confirmed the findings of consumer, civil rights, and community-based organizations who petitioned you in January 2019 to adopt regulations to end the discriminatory impact of occupation-based discounts. That report revealed that only 29% of drivers in predominately minority ZIP codes receive occupation and education-based discounts, as compared with 47% of drivers living in ZIP codes with predominately white populations.\(^2\) In addition, 75% of drivers in Underserved Communities, as defined by California Code of Regulations, title 10, section 2646.6(c), do not receive these discounts.\(^3\) The Department’s website continues to proclaim that your goal in proposing regulations to address this unfair rate discrimination was to “mak[e]” sure that **safe drivers in all socio-economic classes and regardless of education level attained and occupational status benefit evenly from auto group discounts and more affordable car insurance.”\(^4\)

And yet, **three years after the Department noticed draft regulations**, you have yet to adopt final regulations to prohibit these discriminatory rating practices and continue to approve companies’ use of occupation as a rating factor in violation of Proposition 103. It has now been over 20 months\(^5\) since you last held a workshop on the proposed regulation. Most recently, you approved Allstate’s 2022 rate application to allow continued use of its discriminatory occupation-based rating system charging lower income workers higher premiums than professionals with college degrees, all other characteristics being equal.

Consumer, civil rights, and community-based organizations remain united in supporting a regulation to end this practice. We urge you to:

1. reject Farmers’ pending auto rate applications proposing three tiers of base rates with up to 16.9% higher base rates for drivers who are not employed in one of Farmers’ preferred professional occupations;

2. notice a hearing to determine the amount of additional refunds owed by Farmers based on reduced driving during the COVID-19 pandemic;

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\(^3\) *Id.*, p. 26.


\(^5\) The CDI held a second workshop on a draft regulation in March 2021 but has yet to notice a regulation for a formal rulemaking hearing.
(3) reject the unfairly discriminatory rating systems in all other currently pending 2022 auto rate applications by companies that propose different rates or premiums based on occupation, including those of at least three other companies that Consumer Watchdog has challenged in recent months with petitions for hearing: Mercury, GEICO, and Interinsurance Exchange of the Auto Club; and a Progressive rate application challenged by the Consumer Federation of California; and

(4) swiftly adopt final regulations to end discriminatory occupation-based surcharges industrywide, as you promised to do.

With the Department in the midst of evaluating numerous pending auto insurance rate applications, the time to act is now.

Sincerely,

Pamela Pressley
Senior Staff Attorney

Daniel L. Sternberg
Staff Attorney

cc:
Alec Stone (Alec.Stone@insurance.ca.gov)
Daniel Wade (Daniel.Wade@insurance.ca.gov)
California
Farmers Insurance Exchange, Mid-Century Insurance Company & Truck Insurance Exchange
Private Passenger Automobile Insurance
Base Rates by Program

<table>
<thead>
<tr>
<th>Description</th>
<th>BI</th>
<th>PD</th>
<th>UM</th>
<th>MED</th>
<th>COMP</th>
<th>COLL</th>
<th>TOW</th>
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<tbody>
<tr>
<td>ALL OTHERS</td>
<td>236.525</td>
<td>110.100</td>
<td>41.7425</td>
<td>34.6450</td>
<td>123.9200</td>
<td>353.0900</td>
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<tr>
<td>Group I</td>
<td>223.6812</td>
<td>99.0624</td>
<td>31.7300</td>
<td>31.5808</td>
<td>111.1480</td>
<td>272.1254</td>
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<tr>
<td>Group II</td>
<td>233.0500</td>
<td>101.2500</td>
<td>40.6525</td>
<td>32.6424</td>
<td>116.5685</td>
<td>289.1845</td>
<td>7.6488</td>
</tr>
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</table>
BUSINESS AND PROFESSIONAL GROUPS

Eligibility

All named insureds in the household that have a related relationship (other than ‘O’ for other and ‘U’ for unknown) will be given the highest qualifying discount. Drivers coded as non-drivers (i.e. ‘OH’ for Out-of Household) will not qualify any policy in the household for the discount. All named insureds that are not related will qualify for their own discount. When situations exist with more than one named insured on a policy and there is at least one unrelated named insured on a policy, the highest qualifying discount will be given (which could either be the highest related or highest unrelated).

<table>
<thead>
<tr>
<th>Group I</th>
<th>Group II</th>
</tr>
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<tbody>
<tr>
<td>Certified Public Accountants (CPA’s)</td>
<td>Architects</td>
</tr>
<tr>
<td>Dentists</td>
<td>FIG Federal Credit Union</td>
</tr>
<tr>
<td>Educators</td>
<td>Firefighters</td>
</tr>
<tr>
<td>Engineers</td>
<td>Lawyers/Judges</td>
</tr>
<tr>
<td>Physicians/Surgeons</td>
<td>Registered Nurses</td>
</tr>
<tr>
<td>Scientists</td>
<td>Police Offices/Law Enforcement Officers</td>
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<td>Veterinarians</td>
<td>Aviation Professionals</td>
</tr>
<tr>
<td></td>
<td>Physical and Occupational Therapists</td>
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<td>Speech Audiologists and Pathologists</td>
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<td>Librarians</td>
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<td>Real Estate Agents and Brokers</td>
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<tr>
<td></td>
<td>Small Business Policyholders (Owners &amp; Officers)</td>
</tr>
<tr>
<td></td>
<td>Workers’ Compensation Policyholders (Owners &amp; Officers)</td>
</tr>
<tr>
<td></td>
<td>Zurich Employees/Agents</td>
</tr>
</tbody>
</table>

Qualification

Personal auto policy does **not** include the following: Antique, Campers, Dune Buggies, Farm Trailers, Farm Equipment/Machinery, Motor home Plus, Motorcycles, and Premium Determination (both Normal and Restricted Use).

Only one Business and Professional Group discount can be applied to each policy.

Foreign Degrees and transcripts are acceptable for membership verification but they must be accompanied by a certified translation of the document.

Retirees

Retirees previously employed in a listed Group I or Group II occupation are eligible with supporting documentation: a retirement letter from the former employee, or a pay stub from a pension plan. The retirement letter must be written by the former employer’s human resources representative. It must be clearly legible, provided on a company letterhead, showing the name, mailing address and phone number of the writer. The pay stub from a pension plan must be less than 90 days old, and have the former employee’s legible name and address.
EXHIBIT B
BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Applications of
Farmers Insurance Exchange, Mid-
Century Insurance Company, and
Truck Insurance Exchange,
Applicants.

File No. PA-2019-00004
DECISION DENYING PETITIONER’S
PETITION FOR HEARING

The Commissioner has considered Consumer Watchdog’s (“Petitioner”) Petition for
Hearing. The Commissioner granted the Petition to Intervene on May 6, 2019. As set forth more
fully below, one of Petitioner’s allegations concerns the use of group plans under Insurance Code
section 1861.12. On December 23, 2019 the Commissioner published an Invitation to Prenotice
Public Discussion to explore a possible rulemaking to address the use of group plans under
section 1861.12. The Commissioner finds that during the pendency of the public discussions and
possible rulemaking it would be inefficient for the Department to adjudicate individual insurers’
existing group plans in individual rate applications, and that such piecemeal adjudication may
create further inequities in the market. Therefore, the Commissioner declines to individually
address Petitioner’s challenge to the Applicants’ existing group plans here and, as forth below,
denies the Petition for Hearing (“Petition”). Proceeding by rulemaking rather than case-by-case
adjudication here is also consistent with the Commissioner’s past practices.
I
FACTUAL SUMMARY

On February 11, 2019, Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange (collectively, "Applicants") submitted the following rate applications ("Applications") to the Department of Insurance ("Department").

<table>
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<tr>
<th>RFB File No(s.)</th>
<th>Line(s) of Insurance</th>
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<tbody>
<tr>
<td>19-689</td>
<td>PPA Regular</td>
</tr>
<tr>
<td>19-689-A</td>
<td>PPA Regular</td>
</tr>
<tr>
<td>19-689-B</td>
<td>PPA Regular</td>
</tr>
<tr>
<td>19-716</td>
<td>PPA Business and Professional Group I</td>
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<tr>
<td>19-716-A</td>
<td>PPA Business and Professional Group I</td>
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<tr>
<td>19-716-B</td>
<td>PPA Business and Professional Group I</td>
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<tr>
<td>19-717</td>
<td>PPA Business and Professional Group II</td>
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<tr>
<td>19-717-A</td>
<td>PPA Business and Professional Group II</td>
</tr>
<tr>
<td>19-717-B</td>
<td>PPA Business and Professional Group II</td>
</tr>
</tbody>
</table>

The Applications are subject to California Insurance Code §1861.05.

On March 1, 2019, pursuant to §1861.05, the Department notified the public of the Applications.

On April 15, 2019, the Commissioner received Petitioner's timely Petition.

Applicants submitted an Answer to the Petition on April 25, 2019, generally denying the allegations in the Petition.

The statutory sixty-day "deemed approved" date for the Applications, set forth in §1861.05(c), was April 30, 2019. On April 18, 2019, the Department received correspondence from Applicants, waiving the "deemed approved" date in §1861.05(c).

This decision is based on the Applications, the Petition, and officially noticeable information set forth herein.
II

ANALYSIS

"While companies remain free to formulate their rates under any methodology, the
Commissioner's review of those rates must use a single, consistent methodology." (Cal. Code
Regs, tit. 10, §2643.1.) The consistent methodology that the Commissioner applies to rate
applications is the formula set forth in Title 10, California Code of Regulations, 1 §§2642.1 et seq.

Petitioner's allegations, followed by the Department's response to each allegation, are set
forth below:

Petitioner's Allegation: At the requested public hearing, Consumer Watchdog will
present and elicit evidence to show that Applicants' use of education and occupation to create
three separate base rate tiers for its Regular program and Business and Professional Groups I and
II violates sections 1861.05(a) and 1861.02(a), and 10 CCR § 2632.5(d). Insurance Code section
1861.02(a) provides that "[r]ates and premiums for an automobile insurance policy . . . shall be
determined by application of the following [rating] factors in decreasing order of importance,"
and that any optional rating factors must be adopted by the Commissioner by regulation and have
a substantial relationship to risk of loss or else will constitute unfair discrimination. (Ins. Code §
1861.02(a)(4).) The authorized optional rating factors that have been adopted by the
Commissioner are set forth in 10 CCR § 2632.5(d). Applicants offer lower base rates based on
education and occupational status, which are not authorized rating factors. Use of these different
base rates to charge rates and premiums based on education and occupational status results in
excessive and/or unfairly discriminatory rates in violation of sections 1861.02(a)(4) and
1861.05(a), and the application of unauthorized rating factors in violation of section
1861.02(a)(1)-(3) and the auto rating factor regulations at 10 CCR §§ 2632.4 and 2632.5.
Moreover, while Farmers claims to offer a "discount" to its Business and Professional Groups, its
Business and Professional Groups II (including firefighters and nurses) actually has higher base
rates for all coverages combined than its Regular program base rates.

1 All regulatory references in this decision are to Title 10, California Code of Regulations. Regulations are referred
to as "Regulation" or "Reg."
Department Response: Insurance Code section 1861.12 authorizes group plans. It provides, "Any insurer may issue any insurance coverage on a group plan, without restriction as to the purpose of the group, occupation or type of group. Group insurance rates shall not be considered to be unfairly discriminatory, if they are averaged broadly among persons insured under the group plan." The Commissioner approved Applicants' existing group plans in prior rate applications. Applicants propose in the Applications no new group plans and no substantive changes to their existing group plans. Recently, the Commissioner conducted an investigatory hearing regarding the use and impact of such group plans. During the investigatory hearing the Commissioner received evidence that the use of group plans based on education and occupation factors may have an unfairly discriminatory rating impact for certain California consumers, which is prohibited by Insurance Code section 1861.05, subdivision (a). So on December 23, 2019, the Commissioner published an Invitation to Prenotice Public Discussion to explore a possible rulemaking to address any possible unfairly discriminatory rating impact that may result from the use of group plans.

As explained above, the Commissioner has chosen to address on an industry-wide basis concerns about potentially unfairly discriminatory rates due to use of group plans. Proceeding by rulemaking "offers the agency an opportunity to research and develop all relevant arguments from the affected stakeholders and address a problem in a comprehensive way that treats regulated entities in a like manner." (Association of California Ins. Companies v. Jones (2017) 2 Cal.5th 376, 393-394.) The process commenced with the above-mentioned prenotice public discussion will likely lead to an industry-wide regulatory solution to Petitioner's allegations regarding Applicants' use of group rating plans. The Commissioner finds that during the pendency of the public discussions and possible rulemaking it would be inefficient for the Department to adjudicate individual insurers' existing group plans in individual rate applications, and that such piecemeal adjudication may create further inequities in the market. Therefore, the Commissioner declines to individually address Petitioner's challenge to Applicants' existing group plans here. Proceeding by rulemaking rather than case-by-case adjudication here is also consistent with the Commissioner's past practices. For example, former Commissioner Low chose to address
concerns regarding the use of persistency as an optional factor in personal auto rating by way of rulemaking rather than case-by-case adjudication. (See, e.g., In the Matter of the Rates, Rating Plans, or Rating Systems of State Farm Mutual Automobile Insurance Company, NC-01-01-7149; In the Matter of the Rates, Rating Plans, or Rating Systems of Mercury Insurance Company, NC-01-01-7150.)

With respect to Petitioner’s allegation that Applicant’s Business and Professional Groups II (including firefighters and nurses) actually have higher base rates for all coverages combined than its Regular program base rates, the Department has calculated the base rates and concludes that Petitioner’s allegation is incorrect.

III
CONCLUSION

The Department has considered all of the factors and issues which Petitioner raised and has thoroughly reviewed the Applications. The Department concluded that the Applicants’ proposed rate changes of 6.9% overall in their Private Passenger Auto rates for their Regular Program, Business and Professional Group I, and Business and Professional Group II, are approvable under the currently applicable laws, are generally consistent with other approved automobile group plans currently in effect in this State and will result in rates which are not excessive, inadequate, or unfairly discriminatory, as required by section 1861.05. However, as set forth above, the Commissioner has commenced a process that may lead to regulatory changes regarding the use of group plans under Insurance Code section 1861.12 when harmonized with other relevant provisions of Proposition 103. If and when the Commissioner makes such regulatory changes, the Applicants along with other California insurers will be expected to promptly determine whether their group rating plans conform with the new regulations. All insurers impacted by such regulatory changes shall not delay the submission and proper implementation of a new prior approval application or applications as necessary.
IV
ORDER

The Commissioner finds that the Department's methodology for review has appropriately considered each of the variables Petitioner raised. Therefore, the Commissioner DENIES the Petition for Hearing.

IT IS SO ORDERED this 23rd day of December, 2019.

RICARDO LARA
Insurance Commissioner

By
Kenneth Allen
Deputy Commissioner
PROOF OF SERVICE
In the Matter of the Rate Applications of:
Farmers Insurance Exchange, Mid-Century Insurance Company and
Truck Insurance Exchange, Applicants.
CDI File No. PA-2019-00004

I am over the age of eighteen years and am not a party to the within action. I am an employee of the Department of Insurance, State of California, employed at 45 Fremont Street, 19th Floor, San Francisco, California 94105. On December 23, 2019, I served the following document(s):

DECISION DENYING PETITIONER'S PETITION FOR HEARING
- Rate Filing Application(s) Nos. 19-689, 19-689-A, 19-689-B, 19-716

on all persons named on the attached Service List, by the method of service indicated, as follows:

If U.S. MAIL is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office’s facility for collection of outgoing items to be sent by mail, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office’s practice of collecting and processing documents placed for mailing by U.S. Mail. Under that practice, outgoing items are deposited, in the ordinary course of business, with the U.S. Postal Service on that same day, with postage fully prepaid, in the city and county of San Francisco, California.

If OVERNIGHT SERVICE is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office’s facility for collection of outgoing items for overnight delivery, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office’s practice of collecting and processing documents placed for overnight delivery. Under that practice, outgoing items are deposited, in the ordinary course of business, with an authorized courier or a facility regularly maintained by one of the following overnight services in the city and county of San Francisco, California: Express Mail, UPS, Federal Express, or Golden State overnight service, with an active account number shown for payment.

If FAX SERVICE is indicated, by facsimile transmission this date to fax number stated for the person(s) so marked.

If PERSONAL SERVICE is indicated, by hand delivery this date.

If INTRA-AGENCY MAIL is indicated, by placing this date in a place designated for collection for delivery by Department of Insurance intra-agency mail.

If EMAIL is indicated, by electronic mail transmission this date to the email address(es) listed.

Executed this date at San Francisco, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Cecilia Padua

#1144539.1
## SERVICE LIST

In the Matter of the Rate Applications of:
Farmers Insurance Exchange, Mid-Century Insurance Company and
Truck Insurance Exchange, Applicants.
CDI File No. PA-2019-00004

<table>
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<tr>
<th>Name/Address</th>
<th>Phone/Fax Numbers</th>
<th>Method of Service</th>
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<tbody>
<tr>
<td>Harvey Rosenfield, Esq.</td>
<td>Tel: (310) 392-0522</td>
<td>Via EMAIL</td>
</tr>
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<td>Pamela Pressley, Esq.</td>
<td>Fax: (310) 392-8874</td>
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<tr>
<td>Benjamin Powell, Esq.</td>
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<tr>
<td><strong>CONSUMER WATCHDOG</strong></td>
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<tr>
<td>6330 San Vicente Blvd., Suite 250, Los Angeles, CA 90048</td>
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<tr>
<td>Richard G. De La Mora, Esq.</td>
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<td>Via EMAIL</td>
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<td>Fax: (818) 965-0340</td>
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<tr>
<td>6301 Owensmouth Ave., 3rd Floor, Woodland Hills, CA 91367</td>
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<tr>
<td><a href="mailto:Richard.delamora@farmersinsurance.com">Richard.delamora@farmersinsurance.com</a></td>
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<tr>
<td><strong>NON PARTY</strong></td>
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<tr>
<td>Edward Wu, Esq.</td>
<td>Tel: (213) 346-6635</td>
<td>Via EMAIL</td>
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<tr>
<td>Staff Counsel IV &amp; Public Advisor</td>
<td>Fax: (213) 897-9241</td>
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<tr>
<td>Office of the Public Advisor</td>
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<tr>
<td><strong>CALIFORNIA DEP’T. OF INSURANCE</strong></td>
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<tr>
<td>300 South Spring Street, 12th Floor, Los Angeles, CA 90013</td>
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<td><a href="mailto:Edward.wu@insurance.ca.gov">Edward.wu@insurance.ca.gov</a></td>
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