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BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the Rule Change Application
of

CSAA Insurance Exchange,

Applicant.

File No.: PA-2024-00001; 23-3429

**CONSUMER WATCHDOG'S
AMENDED PETITION FOR
HEARING, PETITION TO
INTERVENE, AND NOTICE OF
INTENT TO SEEK
COMPENSATION**

[Ins. Code §§ 1861.05 and 1861.10; Cal.
Code Regs, tit. 10, §§ 2653.1, 2661.2
and 2661.3]

1 Consumer Watchdog hereby requests that the Insurance Commissioner notice a public
2 hearing pursuant to Insurance Code sections 1861.05, subdivisions (a) and (c), and 1861.10,
3 subdivision (a), on the issues raised in this petition regarding the above-referenced Rule Change
4 Application of CSAA Insurance Exchange (“CSAA” or “Applicant”), at which time Applicant
5 will be directed to appear and respond to the issues raised in this petition. Consumer Watchdog
6 also hereby requests that it be granted leave to intervene in the proceeding on Applicant’s Rule
7 Change Application pursuant to Insurance Code section 1861.10(a). Consumer Watchdog
8 intends to seek compensation in this proceeding, and, pursuant to California Code of
9 Regulations, title 10 (“10 CCR”), section 2661.3 subdivision (c), Consumer Watchdog’s
10 proposed budget is attached hereto as Exhibit A.

11 In support of its petition, Consumer Watchdog alleges:

12 **I. THE APPLICATION**

13 1. On or about November 30, 2023, Applicant filed a Rule Change Application with
14 the California Department of Insurance (“CDI”), seeking to comply with the requirement to offer
15 individual discounts for the two community-level mitigation designations and ten property-level
16 mitigation efforts identified in 10 CCR Section 2644.9, “Consideration of Mitigation Factors;
17 Wildfire Risk Models.” On or about the same date, the company withdrew its prior application
18 (File No. 23-939) filed in April 2023, which had sought to introduce mitigation discounts to
19 comply with 10 CCR § 2644.9 and introduce and new wildfire scoring model. The
20 Commissioner had granted Consumer Watchdog’s Petition to Intervene on CSAA’s prior
21 application (File No. 23-939) in June 2023, and the parties had engaged in discussions regarding
22 the compliance issues raised by that filing. Consumer Watchdog’s Petition for Hearing on that
23 prior filing was subsequently denied on December 5, 2023, as the Commissioner found that
24 Applicant’s withdrawal of that application rendered a hearing in that matter moot. The proposed
25 effective date of this current Application is August 1, 2024. CSAA’s Filing Memorandum states:
26 “CSIE is presenting this as an interim filing to timely comply with 10 CCR Section 2644.9. CSIE
27 will be submitting a separate filing that proposes a new wildfire scoring model, revised rating
28 algorithm, and updated wildfire mitigation discounts in compliance with 10 CCR

1 Section 2644.9.”

2 2. On or about December 15, 2023, the public was notified by the CDI of the
3 Application.

4 **II. PETITIONER**

5 3. Petitioner Consumer Watchdog is a nonprofit, nonpartisan public interest
6 corporation organized to represent the interests of consumers and taxpayers. A core focus of
7 Consumer Watchdog’s advocacy is the representation of the interests of insurance consumers
8 and policyholders, particularly as they relate to the implementation and enforcement of
9 Proposition 103, in matters before the Legislature, the courts, and the CDI.

10 4. Consumer Watchdog’s founder authored Proposition 103 and led the successful
11 campaign for its enactment by California voters in 1988. Consumer Watchdog’s staff and
12 consultants include some of the nation’s foremost consumer advocates and experts on insurance
13 ratemaking matters.

14 5. Consumer Watchdog has served as a public watchdog with regard to insurance
15 rates and insurer rollback liabilities under Proposition 103 by: monitoring rollback settlements
16 and the status of the rollback regulations; reviewing and challenging rate filings made by insurers
17 seeking excessive rates; participating in rulemaking and adjudicatory hearings before the CDI;
18 and educating the public concerning industry underwriting and rating practices, their rights under
19 Proposition 103, and other provisions of state law. Consumer Watchdog has also initiated and
20 intervened in actions in state court and appeared as amicus curiae in matters involving the
21 interpretation and application of Proposition 103 and the Insurance Code.¹

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23
24 ¹ For example, *Calfarm Ins. Co. v. Deukmejian* (1989) 48 Cal.3d 805; *20th Century Ins. Co. v.*
25 *Garamendi* (1994) 8 Cal.4th 216; *Amwest Surety Ins. Co. v. Wilson* (1995) 11 Cal.4th 1243;
26 *Proposition 103 Enforcement Project v. Quackenbush* (1998) 64 Cal.App.4th 1473; *Spanish*
27 *Speaking Citizens’ Found. v. Low* (2000) 85 Cal.App.4th 1179; *Donabedian v. Mercury Ins. Co.*
28 *(2004) 116 Cal.App.4th 968; State Farm Mut. Auto. Ins. Co. v. Garamendi* (2004) 32 Cal.4th
1029; *The Found. for Taxpayer and Consumer Rights v. Garamendi* (2005) 132 Cal.App.4th
1354; *Ass’n of Cal. Ins. Cos. v. Poizner* (2009) 180 Cal.App.4th 1029; *Mercury Cas. Co. v.*
Jones (2017) 8 Cal.App.5th 561; *Mercury Ins. Co. v. Lara* (2019) 35 Cal.App.5th 82; and *State*
Farm General Ins. Co. v. Lara (2021) 71 Cal.App.5th 197.

1 6. Consumer Watchdog has initiated and intervened in numerous proceedings before
2 the CDI related to the implementation and enforcement of Proposition 103’s reforms, including
3 over 140 such proceedings in the last twenty years. In every proceeding that has resulted in a
4 final decision and in which Consumer Watchdog sought compensation from 2003–2022, the
5 Commissioner found that Consumer Watchdog made a substantial contribution, meaning that its
6 participation was separate and distinct from any other party and that it presented relevant issues,
7 evidence, and arguments that resulted in more credible, non-frivolous information being
8 available to the Commissioner in making his final decision.

9 **III. ISSUES AND EVIDENCE TO BE PRESENTED AND POSITIONS OF PETITIONER**

10 7. In the proceeding initiated by Consumer Watchdog’s petition, Consumer
11 Watchdog will present and elicit evidence to show that Applicant’s proposed rating plan and rule
12 changes potentially violate 10 CCR § 2644.9’s requirements relating to the use of wildfire risk
13 models and the implementation of mandatory wildfire risk mitigation factors.

14 8. Based on Consumer Watchdog’s preliminary analysis in consultation with its
15 actuarial expert, and the information contained in the Application and publicly available on the
16 CDI’s website, Consumer Watchdog has identified the following issues with the Application on
17 which it intends to present and elicit evidence as set forth in (a)–(e) below. Each of these issues
18 is directly relevant to determining whether Applicant’s proposed rating plan and rule changes are
19 in compliance with 10 CCR § 2644.9. Consumer Watchdog intends to request further
20 information on these issues through informal/formal discovery from the Applicant and reserves
21 the right to develop and refine its positions as more information is made available.

- 22 a. Pursuant to 10 CCR § 2644.9(g): “Any rate application shall incorporate the insurer’s
23 own California wildfire loss data to the extent that it is credible **to support each**
24 **segment, rating differential, or surcharge being requested** (*emphasis added*). To
25 the extent the insurer’s own California data is not fully credible, the insurer shall
26 credibility-weight its data with an appropriate complement of credibility to support
27 each segment, rating differential, or premium surcharge.” Exhibit 19, provided with
28 this filing, lists the two Community-level and ten Property-level mitigation factors

1 required by 10 CCR § 2644.9. Proposed discount amounts are given for each factor,
2 however, no supporting wildfire loss data whatsoever is incorporated; that being the
3 insurer’s own California data or an appropriate complement of credibility. In fact, no
4 indication is given anywhere in this filing as to how the proposed discount amounts
5 were arrived at, despite the proposed discount amounts being meaningfully different
6 than those proposed in CSAA’s previous application. Thus, CSAA has failed to
7 incorporate its own sufficiently credible California data, or to credibility-weight its
8 data with an appropriate complement of credibility, as is required by 10 CCR
9 § 2644.9(g) to support each of its proposed mitigation discounts.

- 10 b. Per subdivision (k)(A) of 10 CCR § 2644.9: “The insurer shall provide . . . the
11 following information: Which mitigation measure or measures can be taken by the
12 policyholder or applicant to lower the wildfire risk score or classification”

13 Although Section VIII(d) of the document “Mitigation-in-Rating-Plans-
14 Questionnaire.pdf” included with this filing indicates that CSAA does provide this
15 information, and part 3 in the Wildfire Risk Scores—Rating and Eligibility section of
16 the document “Questionnaire-for-Homeowners-or-RP-2024-08-01.pdf” states that
17 “[t]his current filing is intended to include this notification, in compliance with 10
18 CCR Section 2644.9,” it is not clear where the intended notification of mitigation
19 actions is included, if at all.

- 20 c. Subdivision (k) of 10 CCR § 2644.9 states: “Whenever a wildfire risk score, or other
21 wildfire risk classification used by the insurer to segment, create a risk differential or
22 surcharge the premium for a particular policyholder or applicant, . . . the insurer shall
23 . . . provide in writing: (1) The range of such scores or classifications that could
24 possibly be assigned to any policyholder or applicant; (2) The relative position of the
25 score or classification assigned to the policyholder or applicant in question within that
26 range of possible sores or classifications and the impact of the score or classification
27 on the rate or premium; and (3) A detailed written explanation of why the
28 policyholder or applicant received the assigned score or classification; the explanation

1 shall make specific reference to the features of the property in question that
2 influenced the assignment of the score or classification.” The document “Mitigation
3 in-Rating-Plans-Questionnaire.pdf” indicates in Section VIII that each of (1), (2), and
4 (3) above are provided; however, no examples are given. Without examples of these
5 disclosures, it is not possible to ascertain whether CSAA is in compliance with the
6 regulation.

7 d. CSAA must have a process in place for a customer to appeal their wildfire risk score,
8 per subdivision (i) of 10 CCR § 2644.9. CSAA must also provide notification of the
9 policyholder’s right to contact the Department in connection with the insurer’s
10 response to an appeal concerning the wildfire risk score, per subdivision (l) of 10
11 CCR § 2644.9. Similar to the issues raised in section c. above, CSAA indicates in the
12 document “Mitigation-in-Rating-Plans-Questionnaire.pdf” that such a process is in
13 place and such notification is provided, but no examples are given. Therefore,
14 CSAA’s compliance with the regulation cannot be ascertained.

15 e. The document “Questionnaire-for-Homeowners-or-RP-2024-08-01.pdf” states in part
16 3 of the Wildfire Mitigation Credits/Discounts section that “Policyholders are being
17 notified on the declarations page” of the existing Fortify Your Community/Residence
18 Discount, and that “[t]he Company is filing to expand this notification separately in
19 our Mandatory Mitigation Discount filing” (emphasis added). It is Consumer
20 Watchdog’s understanding that the filing captioned herein is the Mandatory
21 Mitigation Discount filing—if that is the case, the language quoted above is
22 erroneous, and must be corrected in order to comply with the Questionnaire
23 instructions.

24 9. This petition is based upon Consumer Watchdog’s preliminary analysis of the
25 Application. Thus, Consumer Watchdog reserves the right to modify, withdraw, and/or add
26 issues for consideration as more information becomes available, including but not limited to
27 violations of Insurance Code section 1859 if it is discovered during the course of the proceeding
28 that Applicant has willfully withheld information from, or knowingly given false or misleading

1 information to, the Commissioner or to any rating organization, advisory organization, insurer or
2 group, association, or other organization of insurers that will affect its rates, rating systems, or
3 premiums that are the subject of this filing.

4 **IV. AUTHORITY FOR PETITION AND GRANTING REQUEST FOR A HEARING**

5 10. The authority for this petition for hearing is Insurance Code section 1861.10,
6 subdivision (a), which grants “any person” the right to initiate or intervene in a proceeding
7 permitted or established by Proposition 103 and the right to enforce Proposition 103.
8 Specifically, as stated above, Consumer Watchdog initiates this proceeding to enforce Insurance
9 Code section 1861.05 and the Commissioner’s regulations.

10 11. Additionally, a hearing is authorized pursuant to Insurance Code section 1861.05,
11 subdivision (c), which allows “a consumer or his or her representative” to request a hearing on a
12 rate application and 10 CCR § 2653.1, which provides that “any person, whether as an
13 individual, representative of an organization, or on behalf of the general public, may request a
14 hearing by submitting a petition for hearing.”

15 12. This petition is timely pursuant to Insurance Code section 1861.05, subdivision
16 (c), and 10 CCR § 2646.4(a)(1) because it is filed within forty-five (45) days of the
17 December 15, 2023 public notice date.

18 **V. INTEREST OF PETITIONER**

19 13. Consumer Watchdog’s interest in the above-captioned proceeding is to ensure that
20 Applicant’s homeowners insurance policyholders are charged rates and premiums that comply
21 with the provisions of Insurance Code section 1861.05(a)’s requirement that “no rate shall be
22 approved or remain in effect which is excessive, inadequate, [or] unfairly discriminatory or
23 otherwise in violation of this chapter,” and the requirements contained in 10 CCR § 2644.9
24 pertaining to wildfire risk mitigation discounts, models and wildfire risk scores. For many
25 homeowners, their home is their most valuable asset and they are required to purchase
26 homeowners insurance by their mortgage lenders. Consumers who are overcharged by insurers
27 for this insurance coverage and/or arbitrarily non-renewed are part of Consumer Watchdog’s
28 core constituency.

1 14. As noted in paragraphs 3–6 *supra*, Consumer Watchdog’s staff and consultants
2 have substantial experience and expertise in insurance rate matters, which Consumer Watchdog
3 believes will aid the CDI in its review of the Application and aid the Commissioner in making
4 his ultimate decision as to whether to approve or disapprove the requested rate. As noted in
5 paragraph 6 above, the Commissioner found that Consumer Watchdog has made a substantial
6 contribution to his decisions in every rate proceeding that has resulted in a final decision and in
7 which Consumer Watchdog sought compensation from 2003–2022. If leave to intervene is
8 granted, Consumer Watchdog will participate fully in all aspects of this proceeding.

9 15. Consumer Watchdog also has an interest in ensuring that Applicant, the CDI, and
10 the Insurance Commissioner comply with the laws enacted by the voters under Proposition 103,
11 and the rules and regulations that implement those laws, including that all information submitted
12 to the CDI in connection with the Application is made publicly available.

13 **VI. AUTHORITY FOR PETITION TO INTERVENE**

14 16. The authority for Consumer Watchdog’s petition to intervene is Insurance Code
15 section 1861.10, subdivision (a), which grants “any person” the right to “initiate or intervene in
16 any proceeding permitted or established pursuant to this chapter [Chapter 9 of Part 2 of Division
17 1 of the Insurance Code] . . . and enforce any provision of this article.” This proceeding is a
18 proceeding to enforce Insurance Code section 1861.05, pursuant to Insurance Code section
19 1861.10(a), and hence is a proceeding both “permitted” and “established” by Chapter 9. Per the
20 voters’ instruction, the mandatory right to intervene under section 1861.10(a), like all the
21 provisions of Proposition 103, must be “liberally construed and applied in order to fully promote
22 its underlying purposes.” (Prop. 103, § 8.) Thus, section 1861.10 must be interpreted and applied
23 broadly in a manner to fully encourage consumer participation. (*Ibid.*; see also *Ass’n of*
24 *California Ins. Cos. v. Poizner, supra*, 180 Cal.App.4th at 1052 [stating “the goal of fostering
25 consumer participation in the administrative rate-setting process” as “one of the purposes of
26 Proposition 103”].) The broad intervention standard enacted by section 1861.10 ensures that
27 consumers will be able to participate in proceedings *independently of the CDI staff* who may take
28 different positions or emphasize different issues in the proceeding, and with all rights accorded

1 to any other party, including the right to raise additional issues and/or violations as they become
2 known during the course of the proceeding through informal or formal discovery.

3 17. This petition to intervene is also authorized by 10 CCR § 2661.1 et seq. In
4 compliance with 10 CCR § 2661.3, the specific issues to be raised and positions to be taken by
5 Consumer Watchdog, *to the extent known at this time*, are set forth in paragraph 8, *supra*. Each
6 of these issues relate directly to specific standards and requirements under 10 CCR § 2644.9, and
7 thus are directly relevant to ultimately determining whether Applicant’s requested rule change
8 application is in compliance with the provisions of the regulation or otherwise unjustified.
9 Although consumer presence in departmental proceedings typically results in significant
10 reductions to policyholders’ rates, the amount of savings for each individual consumer is
11 outweighed by the time and expense of hiring individual counsel or an advocacy group to protect
12 his or her rights. Thus, an independent organization like Consumer Watchdog introduces a voice
13 that otherwise would be absent from this proceeding.

14 **VII. PARTICIPATION OF CONSUMER WATCHDOG**

15 18. Consumer Watchdog verifies, in accordance with 10 CCR § 2661.3, that it will be
16 able to attend and participate in this proceeding without unreasonably delaying this proceeding
17 or any other proceedings before the Insurance Commissioner.

18 **VIII. INTENT TO SEEK COMPENSATION**

19 19. The Commissioner has awarded Consumer Watchdog compensation for its
20 reasonable advocacy and witness fees and expenses in past departmental proceedings. The
21 Commissioner issued Consumer Watchdog’s latest Finding of Eligibility on July 26, 2022,
22 effective for two years as of July 12, 2022. Consumer Watchdog was previously found eligible to
23 seek compensation on August 25, 2020, effective as of July 12, 2020; July 12, 2018; July 14,
24 2016; July 24, 2014; July 24, 2012; July 2, 2010; August 25, 2008; July 14, 2006; July 2, 2004;
25 June 20, 2002; October 1, 1997; September 26, 1995; September 27, 1994; and September 13,
26 1993.

27 20. Consumer Watchdog intends to seek compensation in this proceeding. Pursuant to
28 10 CCR § 2661.3(c), Consumer Watchdog’s estimated budget in this proceeding is attached

1 hereto as Exhibit A. Consumer Watchdog has based its estimated budget on several factors
2 including: (1) the technical and legal expertise needed to address these issues; (2) its current best
3 estimate of the time needed to participate effectively in these proceedings, taking into account
4 the time already expended by Consumer Watchdog’s legal and actuarial staff and an estimate of
5 time needed to complete remaining tasks through completion of a noticed evidentiary hearing;
6 and (3) past experience in similar rate proceedings before the CDI. The estimated budget is
7 reasonable and the staffing level is appropriate, given the expertise that Consumer Watchdog and
8 its consultants bring to these proceedings when the issues involved are issues at the very core of
9 its organizational mission and strike at the very heart of Proposition 103 itself. The budget
10 presented in the attached Exhibit A is a preliminary estimate, and Consumer Watchdog reserves
11 the right to amend its proposed budget as its expenses become more certain, or in its request for
12 final compensation. Consumer Watchdog will give notice of such modifications as soon as
13 practicable after it discovers the need to revise its estimates and shall comply with the budget
14 revision requirements in the relevant intervenor regulations.

15 WHEREFORE, Consumer Watchdog respectfully requests that the Insurance
16 Commissioner GRANT its petition for hearing and petition to intervene in the proceeding,
17 having all rights and responsibilities accorded any other party to the proceeding.

18
19 DATED: March 5, 2024

Respectfully submitted,
Harvey Rosenfield
Pamela Pressley
Ryan Mellino
CONSUMER WATCHDOG

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23 By: 
24 Ryan Mellino
25 Attorneys for CONSUMER WATCHDOG
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1 **VERIFICATION OF RYAN MELLINO IN SUPPORT OF CONSUMER WATCHDOG'S**
2 **PETITION FOR HEARING, PETITION TO INTERVENE, AND NOTICE OF INTENT**
3 **TO SEEK COMPENSATION**

4 I, Ryan Mellino, verify:


5 1. I am a staff attorney for Consumer Watchdog. If called as a witness, I could and
6 would testify competently to the facts stated in this verification.

7 2. I personally prepared the pleading titled "Consumer Watchdog's Petition for
8 Hearing, Petition to Intervene, and Notice of Intent to Seek Compensation" filed in this matter.
9 All of the factual matters alleged therein are true of my own personal knowledge, or I believe
10 them to be true after conducting some inquiry and investigation.

11 3. Pursuant to California Code of Regulations, title 10, section 2661.3, Consumer
12 Watchdog attaches as Exhibit A its estimated budget in this proceeding.

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

15 Executed March 5, 2024 at Los Angeles, California.

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17 Ryan Mellino
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**EXHIBIT A
PRELIMINARY BUDGET**

ITEMS

ESTIMATED COST

1. Consumer Watchdog Attorneys and Paralegal

Pamela Pressley (Senior Staff Attorney) @ \$595 per hour, 100 hours \$59,500

- Draft and edit petition for hearing and petition to intervene; supervise Consumer Watchdog counsel; oversee preparation of motions, briefing; confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Applicant’s counsel; assist in all phases of proceeding, evidentiary hearing, and preparation of post-hearing briefing.

Ryan Mellino (Staff Attorney) @ \$250 per hour, 200 hours..... \$50,000

- Confer with Consumer Watchdog counsel and outside experts regarding legal and evidentiary issues; participate in discussions with CDI and Applicant’s counsel; participate in briefing legal issues; conduct discovery, preparation of motions, and preparation for evidentiary hearing; participate in examination of witnesses and all phases of evidentiary hearing and post-hearing legal briefing; prepare request for compensation.

Kaitlyn Gentile (Paralegal) @ \$200 per hour, 50 hours \$10,000

- Draft and edit petition for hearing and petition to intervene; assist with discovery and preparation of motions and briefs; prepare request for compensation.

Harvey Rosenfield (Of Counsel) @ \$695 per hour, 15 hours \$10,425

- Supervise Consumer Watchdog counsel and participate in strategy discussions.

2. Expert Witness: Ben Armstrong

Ben Armstrong, Staff Actuary @ \$425 per hour, 100 hours \$42,500

- Staff actuary to review all discovery documents; prepare actuarial analysis; participate in meet and confers with the parties as needed; prepare written testimony; testify and assist attorneys in preparation for cross-examination of insurer’s expert witnesses.

3. Consumer Watchdog Expenses

Office expenses (photocopies, facsimile, telephone calls, postage, etc.)\$2,000

Travel (ground transportation; airfare; hotel)\$5,000

TOTAL ESTIMATED BUDGET: **\$179,425**

Service List

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