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BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the matter of the rates of

NATIONAL GENERAL INSURANCE
COMPANY,

Applicant.

File No: 17-4293

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

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

Consumer Federation of California hereby requests that the Insurance
Commissioner schedule a public hearing pursuant to California Insurance Code (CIC) sections
1861.05(c) and 1861.10(a) and section 2653.1 of Title 10 of the California Code of Regulations
("10 CCR") on the above referenced private passenger auto insurance rate application of the
Applicant at which time the Applicant will be directed to appear and respond to the issues raised
in this petition. The petition of Consumer Federation of California respectfully shows:

I. THE APPLICATION

1. On or about June 26, 2017 National General Insurance Company ("Applicant"),
which sells private passenger automobile insurance, filed a Prior Approval Rate Application
("Application" or "rate filing") with the California Department of Insurance for approval of a
rate increase of 6.9% for Applicant's Motorcycle program (File No. 17-4293, "the proceeding").

CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR HEARING, PETITION TO INTERVENE,
AND NOTICE OF INTENT TO SEEK COMPENSATION - 1

1 On or about June 30, 2017, the public was notified of the Application. As is detailed in Section
2 Three below, there is evidence that the proposed rates for the motorcycle program are excessive.
3 In addition to reviewing the actuarial issues identified in this petition, we believe the
4 Department must review the rates and related conduct of Applicant in light of recent news
5 concerning its involvement with Wells Fargo Bank in the improper force-placement of
6 insurance on as many as 800,000 unsuspecting customers across the country. The customers
7 impacted by this potentially include California customers of the Applicant – both its motorcycle
8 program customers and those of other programs not directly impacted by the proposed rate
9 increase in this Application. Improper issuance of force-placed coverage could impact the rates
10 in all programs, so, in light of these credible concerns, with this petition CFC seeks a hearing
11 regarding the rates for all private passenger automobile liability and physical damage policies
12 issued by Applicant. Evidence suggesting that Applicant’s rates for all programs may be
13 excessive include a 2016 loss ratio of 36.29% and the aforementioned arrangement between
14 Applicant and Wells Fargo. We believe that it would be inappropriate to approve any rate
15 application – concerning any program offered by the Applicant – without a thorough
16 consideration of, and investigation into, Applicant’s arrangement with Wells Fargo.

17 18 **II. PETITIONER**

19 2. The petitioner, Consumer Federation of California, is a non-profit 501(c)(4)
20 federation of individual consumer members and several organizational members that are
21 comprised of California consumers, including consumer groups, senior citizen, labor and other
22 organizations. The primary business address of Consumer Federation of California is 1107 9th
23 St. Suite 625, Sacramento, CA 95814 and the phone number is 916-498-9608. On June 22,
24 2016, Consumer Federation of California was deemed eligible to seek compensation in CDI
25 proceedings pursuant to CIC section 1861.10 by order of Insurance Commissioner Dave Jones.
26 The finding of eligibility is effective for two years.

27 3. The Consumer Federation of California and its predecessor, the Association of
28 California Consumers, has been advocating for consumers in California for more than 50 years

1 and is an affiliate of the Consumer Federation of America. As set forth in its Articles of
2 Incorporation, the Consumer Federation of California's purpose is:

3 to promote the interests of consumers, using peaceful lawful
4 methods to: (1) agree upon specific consumer legislation and issues and to
5 propose and marshal support for such legislation, and issues, at all levels of local,
6 state and federal government; (2) represent, advocate or promote consumers
7 before any or all public agencies or decision making bodies at all levels of local,
8 state or federal government and before any or all private organizations, agencies,
9 commissions or decision making bodies; (3) represent consumers and the
10 interests of residential customers for the purpose of participating in
11 administrative, commission proceedings and litigation within the maximum legal
12 limits allowed of a 501(c)(4) tax exempt corporation under Federal and
13 California law; (4) promote the organization of local consumer groups and
14 encourage their affiliation with the Consumer Federation of California; and (5)
15 cooperate with the Consumer Federation of America and similar state and
16 national federations.

17 4. To achieve its consumer advocacy goals, the Consumer Federation of
18 California maintains a full-time staff in Sacramento to continuously monitor legislative,
19 regulatory and other public issues affecting consumers in order to effectively represent
20 consumers and promote or oppose policies and decisions that affect them. Recognized
21 for its role as a leading consumer organization in California, Consumer Federation of
22 California's Executive Director Richard Holober served on both the Consumer Advisory
23 Board and Task Force on Insurance Fraud established by former Insurance
24 Commissioner Poizner. In addition, Consumer Federation of California Board President
25 Jim Gordon has served on the California Automobile Assigned Risk Plan Advisory
26 Board as an appointee of the Insurance Commissioner to represent consumers since 2005.
27 Consumer Federation of California has also engaged Douglas Heller, a nationally-
28 recognized consumer advocate with expertise in insurance matters, extensive experience

1 representing consumers before the Department of Insurance and, specifically, extensive
2 experience intervening to challenge California rate filings pursuant to Proposition 103.

3 5. Bickmore, a Sacramento-based risk services consulting firm, will provide
4 actuarial expertise to Consumer Federation of California in conjunction with this hearing.
5 Bickmore is ranked as the largest risk consulting firm that is independent of brokerage
6 and insurance company operations in the western United States and has extensive
7 experience with property and casualty insurance ratemaking and California's insurance
8 regulation environment. Among the actuaries and analysts who will be able to assist
9 Consumer Federation of California is Bickmore's President, Regulatory & Alternative
10 Risk Consulting, Mark Priven, FCAS, MAAA, who serves on the California Workers'
11 Compensation Insurance Rating Bureau Actuarial Committee.

12 13 **III. EVIDENCE**

14 6. At the hearing, Consumer Federation of California will present and elicit
15 evidence to show that the rate plan proposed by the Applicant in the proceeding is excessive
16 and/or in violation of CIC section 1861.05(a), which provides "[n]o rate shall be
17 approved...which is excessive, inadequate, unfairly discriminatory or otherwise in violation of
18 this chapter," among other violations. Consumer Federation of California will also present and
19 elicit evidence that the proposed rate violates 10 CCR §2644.1 *et seq.*

20 7. Based on our preliminary analysis of the rate filing and information contained in
21 the Application, as well as news reports and Applicant's website, the following issues indicate
22 that the Applicant's proposed rates are likely excessive, in violation of Insurance Code section
23 1861.05(a), and 10 CCR § 2644.1, *et seq.*:

- 24 a. *Loss Trends (10 CCR § 2644.7)*: The Applicant selected the 8-point trend period in
25 this Application. The Applicant does not explain why the 8-point trend period, using
26 closed claims and paid losses, is the most actuarially sound selection. The selection
27 of longer trends would likely reduce the rate indication of the Applicant. The
28 Applicant has failed to provide the calculated loss trend credibility for each coverage

1 in Exhibit 10. In violation of § 2644.7, the Applicant has relied on the experience
2 credibility for the loss trend credibility. In addition, the complement of credibility for
3 loss trend appears to be based on countrywide motorcycle data. Applicant should be
4 using California data for its complement. The Applicant fails to justify why the use
5 of countrywide motorcycle data for the complement of credibility for loss trend
6 produces the most actuarially sound rate.

7 b. *Loss Development (10 CCR § 2644.6)*: The selected loss development factors appear
8 to be based on countrywide motorcycle data. Applicant should be using California
9 data for its loss development factors. In addition, the Applicant has failed to
10 demonstrate that the quarterly loss development factors are more actuarially sound
11 than the annual loss development factors.

12 c. *Excessive Rate (1861.05, 10 CCR § 2644.1)*: Applicant has proposed a rate change
13 for “Misc Comp” coverage that exceeds the Maximum Permitted Earned Premium,
14 even when calculated using Applicant’s own rate template selections. This violates
15 Insurance Code Section 1861.05 and 10 CCR § 2644.1, which states that “No rate
16 shall be approved...that is above the maximum permitted earned premium...”

17 d. As is described in more detail in Paragraph 8, Applicant’s involvement in the
18 potentially fraudulent force-placement of auto insurance on Wells Fargo auto loan
19 customers makes it problematic to attempt to determine the propriety of the proposed
20 rate increase on motorcycle program policyholders without the thorough and public
21 inquiry into Applicant’s rate filing that a hearing would provide. The force-placed
22 coverage that may make up a portion of the Applicant’s overall premium might
23 include force-placed motorcycle policies directly impacted by this Application, as
24 indicated by the Applicant’s website, which states that “coverage can be provided on
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1 other collateral in [a lender's] portfolio, including motorcycles, recreational vehicles
2 and boats.”¹ [Emphasis Added]

3 8. Based on our preliminary analysis of the rate filing and information contained in
4 the Application, information in the Applicant's most recently approved rate application,
5 information in Applicant's parent company's Annual Statement and Annual Report (10-K), and
6 other publicly available information, the following facts indicate that the Applicant's existing
7 rates in other programs may be excessive and in violation of Insurance Code section 1861.05(a),
8 and 10 CCR § 2644.1, et seq.:

9 a. According to the Application, the Applicant's Annual Statement, and as reported in
10 the California Department of Insurance 2016 California P & C Market Share Report,
11 Applicant's combined Private Passenger Auto Liability and Private Passenger Auto
12 Physical Damage Loss Ratio in 2016 was 36.29% (or 36.22%, depending upon the
13 document). This ratio of incurred losses to earned premium is less than half the loss
14 ratio for the combined lines statewide. Among the 87 companies with more than \$15
15 million in California Earned Premium, Applicant reported the lowest loss ratio in the
16 state, and only three of those companies (including Applicant's Affiliate National
17 General Assurance at 53.86%) were within 20 percentage points of Applicant's Loss
18 Ratio.

19 b. A recent *New York Times* story² and subsequent reporting revealed that Applicant
20 has, for several years, had an arrangement with Wells Fargo to force-place coverage
21 on its loan recipients without adequate controls to determine if the car owners
22 actually needed the insurance. To the extent that this “Collateral Protection
23 Insurance,” was fraudulently imposed on customers, without notifying its customers,

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25 ¹ <http://www.nationalgeneral.com/lenderservices/autoriskManagement/>

26 ² Morgenson, G., July 27, 2017. Wells Fargo Forced Unwanted Auto Insurance
27 on Borrowers, *New York Times* retrieved from
28 <https://www.nytimes.com/2017/07/27/business/wells-fargo-unwanted-auto-insurance.html>

1 or providing them an opportunity to furnish proof of current insurance coverage, it is
2 likely that these policies would have very low or no losses, as the customers would
3 turn to their selected insurance carrier to cover any claims. The possibility that the
4 company is charging any premium for policies that customers do not know about or
5 do not need demands further investigation, and CFC believes that this Application
6 should be subject to a review that incorporates all programs of the Applicant.³

7 9. Based upon its initial analysis, CFC submits that Applicant's overall requested
8 rate increase of 6.9% for its motorcycle program is likely excessive and a lower overall rate
9 adjustment would be appropriate. Further, we submit that the Applicant's entire book of private
10 passenger automobile insurance business should be reviewed due to Applicant's extremely low
11 most recent loss ratio and recently revealed evidence of its potential defrauding of California
12 policyholders. The Commissioner should investigate potential collusion between Applicant and
13 Wells Fargo, including reports of kickback payments in the form of commissions to Wells Fargo,
14 and potential identity theft in creation of fraudulent policies for California residents without
15 their knowledge or consent. The Commissioner could reject the requested rate increase, order a
16 lower overall rate adjustment, and take such further corrective action as necessary. This petition
17 is based on Consumer Federation of California's preliminary analysis, and Consumer Federation
18 of California reserves the right to address additional issues, including issues related to forms and
19 rules submitted as part of this filing, that may be identified prior to or during the hearing as
20 more information becomes available.

21 **IV. TIMELY PETITION**

22 10. This petition is timely pursuant to Insurance Code section 1861.05(c) and 10
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26 ³ Although the Application does not propose changes to the rates in other
27 programs, data related to premium and losses in other programs are contained in this filing, and,
28 in addition, it is always within the purview of the Commissioner to review rates of any company
or program to ensure they do not violate California's prohibition on excessive rates "remain[ing]
in effect." Insurance Code Section 1861.05 (a)

1 CCR §2646.4(a)(1), because it is filed within forty-five (45) days of the June 30, 2017 public
2 notice date. This petition does not involve a rate that has been specifically approved by the
3 Insurance Commissioner within the preceding twelve months.

4 **V. NOTICE OF INTENT TO INTERVENE AND AUTHORITY FOR**
5 **PETITION TO INTERVENE.**

6 11. Consumer Federation of California also hereby requests that it be granted leave
7 to intervene in the proceeding on the Applicant's rate application pursuant to CIC section
8 1861.10, which provides that "[a]ny person may initiate or intervene in any proceeding
9 permitted or established pursuant to this chapter [Chapter 9 of Part 2 of Division 1 of the
10 California Insurance Code] ... and enforce any provision of the article." This proceeding is a rate
11 filing submitted pursuant to CIC section 1861.05, making it a proceeding both "permitted" and
12 "established" pursuant to the chapter. The right of Consumer Federation of California to
13 intervene is also authorized pursuant to 10 CCR §2661.1 *et seq*, including §2661.2, which states
14 that "[a]ny person shall be permitted to intervene in any proceeding on any rate application ...
15 subject to Chapter 9 of Part 2 of Division 1 of the California Insurance Code if the issues to be
16 raised by the intervenor or participant are relevant to the issues of the proceeding." As is set
17 forth in Section III Evidence (paragraphs 6 through 9 of this petition), Consumer Federation has
18 raised issues directly related to the compliance of the rate application with California laws and
19 regulations and relevant to the issues of the proceeding. As a recognized representative of
20 consumers in California, (see, for example, the April 20, 2012 Order of Insurance
21 Commissioner Dave Jones finding Consumer Federation of California "eligible to seek
22 compensation for its representation of consumers' interests"), Consumer Federation of
23 California will add both expertise and an efficient representation of the policyholders who will
24 be affected by this proceeding.

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26 **VI. VERIFICATION OF PARTICIPATION.**

27 12. Consumer Federation of California will submit testimony from actuarial experts
28 and fully participate in all aspects of the proceeding. In accordance with 10 CCR §2661.3,

1 Consumer Federation of California verifies that it will be able to attend and participate in this
2 proceeding without unreasonably delaying this proceeding or any other proceedings before the
3 Insurance Commissioner.

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5 **VII. PETITIONER'S INTEREST**

6 13. Consumer Federation of California's interest in the above captioned proceeding is
7 to ensure that consumers who purchase automobile insurance policies from the Applicant are
8 charged rates that comply with California Insurance Code section 1861.05 prohibiting, among
9 other things, rates that are "excessive, inadequate, unfairly discriminatory or otherwise in
10 violation of this chapter." Further, Consumer Federation of California seeks to ensure that the
11 Applicant's rate application complies with California's prior approval rate regulations
12 commencing with 10 CCR §2641.1.

13 14. As an organization dedicated to protecting the rights of consumers, Consumer
14 Federation of California is especially concerned with the pricing of products and services, such
15 as auto and home insurance, that consumers are required or effectively required to purchase. As
16 noted in Section III Evidence (paragraphs 6 through 8), Consumer Federation of California and
17 its experts believe that the Applicant has filed for a rate increase that is excessive and that,
18 further, there is evidence that rates for all of the programs in this company's book of business
19 are excessive. Consumer Federation of California seeks this grant of intervention in order to
20 represent the interests of consumers in ensuring compliant rates. Consumer Federation of
21 California believes that, if granted leave to intervene, it will provide information that will aid the
22 Department of Insurance in its review of the Application.

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24 **VIII. INTENT TO SEEK COMPENSATION**

25 15. Pursuant to CIC section 1861.10 and 10 CCR §2661.3, Consumer Federation of
26 California intends to seek compensation in this proceeding. Consumer Federation of
27 California's estimated budget is attached as Exhibit A. Consumer Federation of California has
28 based this budget on the technical expertise and regulatory experience needed to address the

1 issues of concern in the proceeding; its best estimate of the amount of time needed to participate
2 in and contribute to the proceeding, taking into account both the amount of time that has already
3 been spent by Consumer Federation staff and expert consultants and an estimate of time needed
4 to complete the tasks required for a rate hearing as requested here; and the past experience of
5 Consumer Federation of California's consultants in similar rate proceedings and other rate
6 making and rate review matters. Consumer Federation of California presents the attached
7 budget as a preliminary estimate and reserves the right to amend the budget as time and other
8 expenses required to participate in this proceeding become more certain, or in its request for
9 final compensation. Consumer Federation of California will give notice of such modifications
10 as soon as it is practicable and will comply with 10 CCR §2661.3 (d) concerning budget
11 revisions. We believe that this estimated budget is a reasonable reflection of the required
12 staffing level and other expenses for a proceeding such as this.

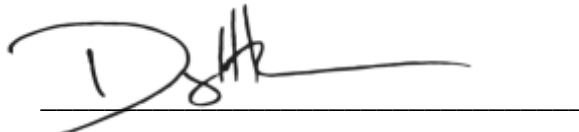
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15 WHEREFORE, Consumer Federation of California requests that the Insurance
16 Commissioner grant its petition for hearing and petition to intervene in the proceeding initiated
17 on Applicant's rates.

18 DATED: August 8, 2017

Respectfully submitted,

19
20 Richard Holober
21 Douglas Heller
22 Consumer Federation of California

23 By: _____



24 Douglas Heller
25 for Consumer Federation of California
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1 **VERIFICATION OF DOUGLAS HELLER IN SUPPORT OF**
2 **CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR HEARING,**
3 **PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK COMPENSATION**

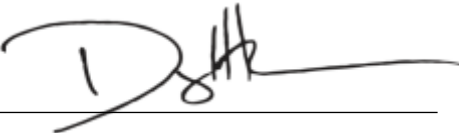
I, Douglas Heller, verify:

4 1. I am an advocate retained by Consumer Federation of California. If called
5 as a witness, I could and would testify competently to the facts stated in this verification.

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

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

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14 I declare under penalty of perjury under the laws of the State of California that
15 the foregoing is true and correct. Executed August 8, 2017, at Los Angeles, California.

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Douglas Heller

1 **EXHIBIT A**

2 **PRELIMINARY BUDGET**

3 **ITEMS**

ESTIMATED COST

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6 1. Advocates

7 Douglas Heller @ \$315 per hour, 175 hours..... \$55,125

8 • Draft and edit petition for hearing and petition to intervene; confer
9 with Consumer Federation of California (CFC) counsel and outside experts
10 regarding legal and evidentiary issues; participate in discussions with CDI and
11 Applicant’s counsel and staff; brief issues; assist in conducting discovery and
12 preparation for evidentiary hearing; participate in evidentiary hearing and post-
13 hearing briefing; prepare request for compensation.

14 Richard Holober @ \$265 per hour, 10 hours..... \$2,650

15 • Confer with CFC advocates, attorneys and experts regarding
16 strategy and decision-making; participate in discussions with CDI and Applicant’s
17 counsel and staff.

18 Tony Roberts @ \$350 per hour, 30 hours..... \$10,500

19 • Confer with CFC advocates, attorneys and experts regarding
20 evidentiary issues; assist in conducting discovery and preparation for evidentiary
21 hearing; participate in discussions with CDI and Applicant’s counsel and staff.

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23 2. Attorney

24 Aaron Lewis @ \$335 per hour, 175 hours..... \$58,625

25 • Review petitions; confer with CFC advocates and experts regarding
26 legal and evidentiary matters; participate in discussions with CDI and Applicant’s
27 counsel and staff; brief legal issues; conduct discovery and prepare for evidentiary
28 hearing; participate in evidentiary hearing and post-hearing briefing.

3. Expert Witness

24 Mark Priven, FCAS, MAAA, President, Regulatory & Alternative Risk Consulting \$97,500
25 @ \$650 per hour, 150 hours

26 • Lead actuary will review discovery documents, prepare rate
27 analysis, participate in meetings and confer with the parties as needed;
28 prepare written testimony; testify and assist attorneys and advocates in
preparation for cross-examination of insurers’ expert witnesses, assist in
preparation of post-hearing briefs.

1 4. Actuarial Support

2 Becky Richard, ACAS, MAAA, Senior Manager Property and Casualty Actuarial \$136,500
3 Services @ \$455 per hour, 300 hours

- 4 • Assist Mr. Priven in review of all discovery documents, preparing
5 rate analysis, participate in meetings and confer with the parties as needed;
6 assist in preparation of written testimony and assist attorneys and advocates
7 in preparation for cross-examination of insurers' expert witnesses.

8 Nina Gau, FCAS, MAAA, Director Property and Casualty Actuarial Services @ \$13,000
9 \$650 per hour, 20 hours

- 10 • Assist Mr. Priven in review of all discovery documents, preparing
11 rate analysis, participate in meetings and confer with the parties as needed;
12 assist in preparation of written testimony and assist attorneys and advocates
13 in preparation for cross-examination of insurers' expert witnesses.

14 Expenses (postage/delivery, photocopies, transcripts, facsimiles, telephone calls, \$2,000
15 etc.).....

16 Travel (airfare, ground transportation, hotel, meals, etc)..... \$3,000

17 Total Estimated Budget \$378,900

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PROOF OF SERVICE
[BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,
EMAIL TRANSMISSION AND/OR PERSONAL SERVICE]

State of California, City of Sacramento, County of Sacramento

I am employed in the City of Sacramento and County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action. My business address is 1107 9th St., Suite 625, Sacramento, CA 95814, and I am employed in the city and county where this service is occurring.

On August 8, 2017 between 12:30 PM and 1:00 PM, I caused service of true and correct copies of the document entitled

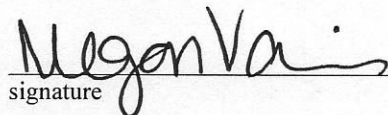
CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR HEARING, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK COMPENSATION

upon the persons named in the attached service list, in the following manner:

1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number stated to the person(s) named.
2. If marked EMAIL, by electronic mail transmission this date to the email address stated.
3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this date for collection for regular or overnight mailing true copies of the within document in sealed envelopes, addressed to each of the persons so listed. I am readily familiar with the regular practice of collection and processing of correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed by U.S. Mail, these envelopes would be deposited this day in the ordinary course of business with the U.S. Postal Service. If mailed Overnight, these envelopes would be deposited this day in a box or other facility regularly maintained by the express service carrier, or delivered this day to an authorized courier or driver authorized by the express service carrier to receive documents, in the ordinary course of business, fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on August 8, 2017, at Sacramento, California.

Megan Varvais


signature

SERVICE LIST

Person Served

Method of Service

<p>Daniel Goodell Rate Enforcement Bureau Chief California Department of Insurance 45 Fremont Street, 21st Floor San Francisco, CA 94105 Tel. No.: (415) 538-4111 Fax No.: (415) 904-5490 Daniel.Goodell@insurance.ca.gov Cecilia.Padua@insurance.ca.gov Tina.Warren@insurance.ca.gov</p>	<p><input type="checkbox"/> FAX <input type="checkbox"/> U.S. MAIL <input type="checkbox"/> OVERNIGHT MAIL <input type="checkbox"/> HAND DELIVERED <input checked="" type="checkbox"/> EMAIL</p>
<p>Ken Allen Deputy Commissioner, Rate Regulation California Department of Insurance 45 Fremont Street, 21st Floor San Francisco, CA 94105 Tel. No.: (415) 538-4381 Fax No.: (415) 904-5490 allenk@insurance.ca.gov</p>	<p><input type="checkbox"/> FAX <input type="checkbox"/> U.S. MAIL <input type="checkbox"/> OVERNIGHT MAIL <input type="checkbox"/> HAND DELIVERED <input checked="" type="checkbox"/> EMAIL</p>
<p>Edward Wu Staff Counsel and Public Advisor Office of the Public Advisor California Department of Insurance 300 South Spring Street, 12th Floor Los Angeles, CA 90013 Tel. No.: (213) 346-6635 Fax No.: (213) 897-9241 edward.wu@insurance.ca.gov</p>	<p><input type="checkbox"/> FAX <input type="checkbox"/> U.S. MAIL <input type="checkbox"/> OVERNIGHT MAIL <input type="checkbox"/> HAND DELIVERED <input checked="" type="checkbox"/> EMAIL</p>
<p>Kristi Harris, Regulatory Specialist National General Insurance Co. 5630 University Parkway Winston-Salem, NC 27105 336-435-3132 [Phone] 53132 [Ext] 336-435-8105 [FAX] Kristi.Harris@NGIC.com</p>	<p><input type="checkbox"/> FAX <input checked="" type="checkbox"/> U.S. MAIL <input type="checkbox"/> OVERNIGHT MAIL <input type="checkbox"/> HAND DELIVERED <input checked="" type="checkbox"/> EMAIL</p>