

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

RECEIVED AND FILED
COMMONWEALTH COURT
OF PA (PHILA)

2010 JAN -7 P 2:57

JOEL S. ARIO
Insurance Commissioner of the
Commonwealth of Pennsylvania,

Plaintiff,

v.

RELiance INSURANCE COMPANY,

Defendant.

DOCKET NO. 269 M.D. 2001

IN RE: Liquidator's Petition to Approve a Plan for Allocation of Certain Policyholder Collateral for Guaranty Association Deductible Payments and Reliance Retrospective Premium Obligations

ORDER

AND NOW, this _____ day of _____, 2010, upon consideration of the Liquidator's Petition To Approve a Plan for Allocation of Certain Policyholder Collateral for Guaranty Association Deductible Payments and Reliance Retrospective Premium Obligations and there being no objections to said Petition, the Petition is GRANTED.

Further, it is ORDERED that:

(1) the Liquidator is authorized to allocate the Collateral under the Combined Collateral Plan as set forth in the Petition to both Reliance and the guaranty associations (“GAs”) on a “first in, first out” basis;

(2) the Liquidator is authorized to deduct 3% from reimbursements of Collateral to the GAs for the Liquidator’s expenses incurred in fulfilling his responsibilities under 40 P.S. §221.23a;

(3) the Combined Collateral Plan fulfills the Liquidator’s duty under 40 P.S. §221.23a to equitably allocate the Collateral; and

(4) the Combined Collateral Plan is approved as proposed.

And further, the Liquidator shall provide all listed on the Master Service List and all GAs with notice of this Order, shall post a true and correct copy in PDF format on the Reliance Documents website (www.reliancedocuments.com) and shall file an affidavit with this Court affirming that service was so effected.

BONNIE BRIGANCE LEADBETTER,
President Judge

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

JOEL S. ARIO
Insurance Commissioner of the
Commonwealth of Pennsylvania

Plaintiff,

v.

RELiance INSURANCE COMPANY,

Defendant.

DOCKET NO. 269 M.D. 200

2009 JAN -7 P 2:51

RECEIVED AND FILED
COMMONWEALTH COURT
OF PA (PHILA)

**PETITION TO APPROVE A PLAN
FOR ALLOCATION OF CERTAIN POLICYHOLDER COLLATERAL FOR
GUARANTY ASSOCIATION DEDUCTIBLE PAYMENTS AND FOR
RELiance RETROSPECTIVE PREMIUM OBLIGATIONS**

Petitioner, Joel S. Ario, Insurance Commissioner of the Commonwealth of Pennsylvania, in his official capacity as Statutory Liquidator (“Liquidator”) of Reliance Insurance Company (“Reliance”), petitions the Court for approval of a plan of allocation under 40 P.S. §221.23a for certain policyholder collateral originally posted by former Reliance policyholders to secure deductible obligations and, in some instances, retrospective premium obligations to Reliance under policies issued by Reliance.

BACKGROUND

1. Reliance issued numerous policies of workers compensation, automobile liability and general liability insurance which contained deductible obligations

("Deductible Policies").¹ The Deductible Policies were issued in a variety of configurations. Some policyholders only had Deductible Policies covering workers compensation claims ("WC Policies"). Other policyholders had both WC Policies and separate Deductible Policies covering automobile liability and/or general liability claims ("AL/GL Policies"). To secure the deductible obligations under the Deductible Policies, the policyholders posted collateral with Reliance ("Collateral"). In addition, for certain insureds with multi-year workers compensation programs written by Reliance, the Collateral may also have secured the insured's obligation under other policy years to pay retrospective premium obligations to Reliance.

2. After Reliance was placed in liquidation in October 2001, most claims which had arisen under the Deductible Policies were sent to the guaranty associations ("GAs"). Subject to applicable statutory limitations, the GAs assumed the obligation to pay claims within the deductible under the WC Policies ("GA Covered WC Deductible Claims"). A few GAs also accepted the claims within the deductible under the AL/GA Policies ("GA Covered AL/GL Deductible Claims" and, collectively with the GA Covered WC Deductible Claims, "GA Covered Deductible Claims"). Most GAs, however, determined that the claims within the deductible under the AL/GA Policies were not covered under their statutory schemes and declined to pay the claims ("Non-Covered Claims") until losses for the claims exceeded the deductible amount.

¹ A Deductible Policy can be defined for purposes of this petition as "any combination of one or more policies, endorsements, contracts or security agreements which provide for the policyholder to bear the risk of loss within a specified amount per each claim or occurrence covered under a policy of insurance. . . .". See 40 P.S. §221.23a(n).

3. In June 2004, the Pennsylvania Legislature enacted an amendment to the Pennsylvania Insurance Department Act, 40 P.S. §221.23a (“Section 221.23a”). Section 221.23a provides a framework for the administration by a liquidator of all collateral held to secure policyholder deductibles and other policyholder obligations. If an insured fails to fund these obligations, the liquidator may draw the collateral to pay or reimburse claims within the deductible. 40 P.S. §221.23a(b). Where a claim within the deductible is covered by a GA, the collateral will be used to reimburse the GA for claims paid within the deductible - such as the GA Covered Deductible Claims. 40 P.S. §221.23a(f)(1). If for some reason, a GA declines claims subject to a deductible obligation – such as the Non-Covered Claims - the liquidator is required to utilize the collateral to pay the Non-Covered Claims directly. 40 P.S. §221.23a(c). The liquidator is also directed to use the collateral to pay other obligations of the policyholder, such as retrospective premium obligations, to the insolvent insurer. 40 P.S. §221.23a(d).² Section 221.23a permits the liquidator to utilize up to 3% of the collateral to reimburse the liquidation estate for expenses incurred in fulfilling obligations under the Section (“Section 221.23a Expenses”). 40 P.S. §221.23a(i)(1). Section 221.23a specifically provides that the collateral is not an asset of the liquidation estate.

4. The obligations imposed upon a liquidator by Section 221.23a are relatively straightforward in situations where the available collateral is sufficient to pay all outstanding and anticipated claims against the collateral, including reimbursement of

² The discussion concerning utilization of collateral to fund policyholder obligations is predicated on the fact that demand was made upon the policyholder to directly fund these obligations and the policyholder is unwilling or unable to fulfill these obligations.

GA Covered Deductible Claims, payment of Non-Covered Claims and payment of retrospective premium obligations.³ Where, however, the liquidator determines that the collateral is insufficient to pay all outstanding and anticipated claims, Section 221.23a(c) permits the liquidator to develop and file with the Court a plan for equitable allocation and distribution of the collateral. Specifically, Section 221.23a declares:

When the liquidator determines the collateral provided by the insured is insufficient to pay all additional and anticipated claims against the insured, the liquidator may file a plan for equitably allocating the collateral among claimants of the insured which provided the collateral, subject to court approval.

40 P.S. §221.23a(c).

5. At the time of the enactment of Section 221.23a, Reliance held Collateral posted by a number of bankrupt insureds which could have been utilized to reimburse the GA Covered Deductible Claims, to pay Non-Covered Claims and/or to pay Reliance for the policyholder's retrospective premium obligations. The Liquidator determined, however, that for this group of policies there was insufficient Collateral to reimburse or fund all existing and anticipated future claims against the Collateral (the WC Policies, AL/GL Policies and retrospective premium policies referenced in this paragraph shall be collectively referenced as the "Under-collateralized Policies"). Pending formulation and Court approval of a plan for the allocation and administration of the Collateral, the Liquidator deferred distribution of Collateral held for the Under-Collateralized Policies.

³ If the collateral is exhausted and the insured is not able to pay the remaining claims within the deductible, the liquidator's obligation to pay such claims from the collateral terminates, and the remaining claims are claims against the insolvent insurer's estate and subject to compliance with the proof of claim process established by the Act. 40 P.S. §221.23a(c).

The Previous WC Plan

6. The Liquidator first addressed the Under-Collateralized Policies where the Collateral at issue secured **only** GA Covered WC Deductible Claims under the WC Policies and, in some instances, retrospective premium obligations owed under WC Policies (“WC Under-Collateralized Policies”). In that situation, the Liquidator concluded that the sole claimants to the Collateral were the various GAs which had paid and continued to pay claims under the WC Under-Collateralized Policies and Reliance for any retrospective premium obligation.

7. The Liquidator, in active consultation with the National Conference of Insurance Guaranty Funds (“NCIGF”), as representative of the GAs, formulated a plan which would facilitate the allocation and release of the Collateral under the WC Under-Collateralized Policies to the GAs and, where applicable, retrospective premium to Reliance (“WC Plan”).

8. A Petition to approve the WC Plan was filed with this Court on September 14, 2007 and on November 27, 2007 this Court issued an Order approving the WC Plan.⁴ The following basic assumptions underlay the WC Plan:

(a) that it would be many years before all claims by the GAs for deductible reimbursements and retrospective premium obligations to Reliance were known and could be quantified in relation to the Collateral;

⁴ The September 14th Petition and November 27th Order are available on the Reliance website (www.reliancedocuments.com) as documents Number 1775 and Number 1844 respectively.

(b) that the GAs and Reliance sought the maximum distribution of Collateral as quickly as possible;

(c) that although interim Collateral distributions and periodic “true ups” were feasible, this procedure would be administratively and financially burdensome for both the GAs and Reliance, and could delay distribution of a significant amount of Collateral; and

(d) that as sole claimants against the Collateral, the concurrence by the GAs and Reliance in a plan of distribution supported a finding by this Court that the equitable standard contemplated by Section 221.23a had been satisfied.

9. Based upon the foregoing, the Liquidator and the NCIGF determined that the most equitable, administratively efficient and expedient method for allocating the Collateral under the WC Under-Collateralized Policies would be on a “first in, first out” basis. Claims by the GAs and Reliance under the WC Under-Collateralized Policies would be reimbursed from the Collateral in the order presented to Reliance or billed by Reliance until the Collateral was exhausted.⁵

10. As provided under Section 221.23a(i)(1), the Liquidator would deduct Section 221.23a Expenses from reimbursements of Collateral to the GAs. Since it was determined that Section 221.23a Expenses exceeded the 3% cap, the expense reimbursement would be deducted at 3%.

⁵ In the event collateral remains after all claims covered by the collateral have been satisfied and the Liquidator is satisfied that no new claims can be presented, any remaining collateral will be returned to the policyholder. See §221.23a(i)(3).

11. All remaining unreimbursed claims by the GAs after Collateral is exhausted could be submitted against the Reliance estate, subject to compliance with the proof of claim process established by the Act. 40 P.S. §221.23a(c).

The New Combined Collateral Plan

12. The Liquidator believes that it is now appropriate to address the second category of Under-Collateralized Policies – the situations where inadequate Collateral secures **both** WC Policies and AL/GL Policies (“Combined Under-Collateralized Policies”). As under the WC Plan, the Collateral at issue in this category may also secure retrospective premium obligations to Reliance.

13. As noted above, although a small number of GAs accepted claims within the AL/GL deductible obligation, the majority declined these claims. At the time of the enactment of Section 221.23a in 2004, there were 15 bankrupt Reliance insureds which had Combined Under-Collateralized Policies. There were existing AL/GL claims under these policies when Reliance was placed in liquidation which would be considered Non-covered Claims. Absent a bar date, there was also the possibility that new Non-Covered Claims could be presented against the Collateral and/or the AL/GL Policies. While the GAs have paid and continue to pay GA Covered Deductible Claims under the Combined Under-Collateralized Policies, it was the Liquidator’s obligation under Section 221.23a to investigate and adjust the known Non-Covered claims and to evaluate the possibility of new Non-Covered Claims so as to formulate a plan for allocation of Collateral under the Combined Under-Collateralized Policies.

14. The Liquidator has concluded his evaluation of known and potential Non-Covered Claims and has determined the following

(a) None of the previously identified, open Non-Covered Claims remain open. The Claims have closed for a variety of reasons, including reimbursement from other sources and time bars.

(b) The possibility of a successful assertion of a new Non-Covered Claim is extremely remote. In all likelihood, any new claim would be barred by policy terms or applicable statutes of limitation. It has been determined that there were no known claims under the AL/GL policies which involved a minor or incompetent, factors which would have tolled a statute of limitations.

15. Based upon the Liquidator's determinations above, and consistent with the analysis and reasoning which underlay the WC Plan set forth in paragraphs 8 - 11 above, the Liquidator respectfully requests the Court to authorize the Liquidator to replicate that WC Plan and to release the Collateral securing the Combined Under-Collateralized Policies on a "first in, first out" basis to the GAs for GA Covered Claims and to Reliance for retrospective premium obligations (the "Combined Collateral Plan"). While the Liquidator recognizes that there is a remote possibility that a valid Non-Covered Claim could be presented in the future, neither the language nor underlying rationale of Section 221.23a requires the indefinite retention of Collateral based upon a mere contingency. The Reliance liquidation is now entering its ninth year and the Liquidator has intentionally delayed the presentation to the Court of this Combined Collateral Plan to allow for claim development and to permit any unknown claimants under the AL/GL Policies to come forward. No unknown claimants have come forward. Furthermore, even should a valid, timely Non-Covered Claim be filed in the future, the claim can be

included in the estate, subject to compliance with the proof of claim process established by the Act. 40 P.S. §221.23a(c).

16. The Combined Collateral Plan has been presented to representatives of the NCIGF who concur in its implementation.

17. As with the WC Plan, the Liquidator also requests the Court's authorization to withhold the Liquidator's Section 221.23a Expenses from the Collateral release. Section 221.23a Expenses continue to run in excess of the 3% cap, so they will be deducted at 3%.

CONCLUSION

18. Section 221.23a establishes a complex scheme for the administration by the Liquidator of collateral posted in connection with policyholder obligations under deductible policies. The Combined Collateral Plan presents a situation where, although the amount of Collateral is significant, it is insufficient and the only known constituencies which share an interest in the Collateral, the GAs and Reliance, have cooperated with the Liquidator in the formulation of a fair and reasonable allocation plan.

19. The Liquidator believes that the Combined Collateral Plan, as formulated, fulfills his duty under Section 221.23a to equitably allocate the Collateral. In addition, the Combined Collateral Plan comports with the Liquidator's general duty under the Act to equitably apportion unavoidable loss⁶, if any materializes, while protecting, as best as possible, the interests of all parties.

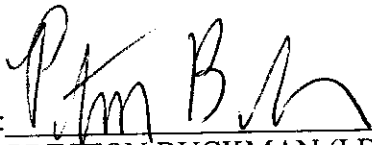
⁶ 40 P.S. §221.1(c)(iv).

WHEREFORE, the Liquidator respectfully requests that this Court enter an

Order:

- (a) granting the Petition;
- (b) authorizing the Liquidator to allocate the Collateral for the Combined Collateral Plan to both Reliance and the GAs on a “first in, first out” basis;
- (c) authorizing the Liquidator to deduct 3% from reimbursements of Collateral to the GAs for the Liquidator’s Section 223.21a Expenses incurred in fulfilling his responsibilities;
- (d) finding that the Combined Collateral Plan fulfills the Liquidator’s duty under Section 221.23a to equitably allocate the Collateral; and
- (e) approving the Combined Collateral Plan as proposed.

Respectfully submitted,

By: 
PRESTON BUCKMAN (I.D. #57570)
Special Funds Counsel
Pennsylvania Insurance Department
Capital Associates Building
Governor's Office of General Counsel
901 North 7th Street
Harrisburg, PA 17102
(717) 787-6009

Attorney for Joel S. Ario, Insurance
Commissioner of the Commonwealth of
Pennsylvania, in his official capacity as
Statutory Liquidator of Reliance Insurance
Company

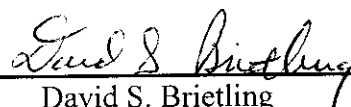
Dated: January 7, 2010

VERIFICATION

I, David S. Brietling, am Chief Liquidation Officer of Reliance Insurance Company (In Liquidation). I hereby verify that the facts set forth in the foregoing Petition to Approve a Plan for Allocation of Certain Policyholder Collateral for Guaranty Association Deductible Payments and Reliance Retrospective Premium Obligations are true and correct to the best of my knowledge, information and belief.

I understand that this Verification is made subject to the penalties of 18 P.S. §4904 relating to unsworn falsification to authorities.

Date: January 7, 2010



David S. Brietling
Chief Liquidation Officer
Reliance Insurance Company
(In Liquidation)

CERTIFICATE OF SERVICE

I, Claire Rocco, hereby certify that on or about this day, pursuant to the Court's Order of December 12, 2008, service of the foregoing Petition to Approve a Plan for Allocation of Certain Policyholder Collateral for Guaranty Association Deductible Payments and Reliance Retrospective Premium Obligations was made on the attached Master Service List and on the attached list of guaranty associations through the transmission of a Notice of Filing and through posting of a true and correct copy in the PDF format on the Reliance Documents website (www.reliancedocuments.com).

Dated: January 7, 2010



Claire Rocco

Master Service List

Joel S. Ario, Insurance Commissioner of the Commonwealth of Pennsylvania

v.

Reliance Insurance Company

No. 269 M.D. 2001 (Commonwealth Court of Pennsylvania)

Preston M. Buckman, Esquire, (717) 787-6009
Department Counsel for Insurance
Governor's Office of General Counsel
Commonwealth of Pennsylvania
Insurance Department
Office of the Chief Counsel
Capitol Associates Building
901 North 7th Street
Harrisburg, PA 17102
Phone: (717) 787-6009
Fax: (717) 772 4543
E-mail: pbuckman@state.pa.us
(Attorneys for the Pennsylvania
Insurance Department)

Marilyn K. Kincaid, Esquire, (215) 864-4205
Reliance Insurance Company
(in Liquidation)
Three Parkway
5th Floor
Philadelphia, PA 19102
Phone: (215) 864-4205
Fax: (215) 864-4105
E-mail: marilyn.kincaid@relianceinsurance.com
(Attorney for Reliance Insurance
Company (in Liquidation))

Richard F. McMenamin, Esquire, (215) 963-5751
David L. Harbaugh, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Phone: (215) 963-5751
Fax: (215) 963-5001
E-mail: dharbaugh@morganlewis.com
rmcmenamin@morganlewis.com
(Attorneys for Fuji Bank)

Richard F. McMenamin, Esquire, (215) 963-5596
Erica Smith Klocek, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Phone: (215) 963-5596
Fax: (215) 963-5001
E-mail: esklocek@morganlewis.com
rmcmenamin@morganlewis.com
(Attorneys for Milliken & Company)

Richard F. McMenamin, Esquire, (215) 963-5596
Marc A. Shapp, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Phone: (215) 963-5596
Fax: (215) 963-5001
E-mail: mshapp@morganlewis.com
rmcmenamin@morganlewis.com
(Attorneys for The Bank of New York Mellon
(Formerly Mellon Bank, N.A.))

Jayson R. Wolfgang, Esquire, (717) 237-4852
Buchanan Ingersoll
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101
Phone: (717) 237-4852
Fax: (717) 233-0852
E-mail: jayson.wolfgang@bipc.com
(Attorneys for Federal Insurance Company)

Rowe W. Snider, Esquire, (312) 443-0700
Steven T. Whitmer, Esquire
Julie L. Young, Esquire
Locke Lord Bissell & Liddell LLP
111 S. Wacker Drive
Chicago, Illinois 60606
Phone: (312) 443-0700
Fax: (312) 443-0336
E-mail: rsnider@lockelord.com
swhitmer@lockelord.com
jyoung@lockelord.com
(Attorneys for Illinois Insurance Guaranty Fund)

Daryn E. Rush, Esquire, (215) 446-6220
Gibbons PC
1700 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2769
Phone: (215) 446-6220
Fax: (215) 446-6336
E-mail: drush@gibbonslaw.com
(Attorney for Baptist Health South Florida, Inc.,
Palm Springs General Hospital, and Travelers
Casualty and Surety Co.)

Amy Daubert, (717) 787-2567
Chief Counsel
Pennsylvania Insurance Department
Office of Chief Counsel
1341 Strawberry Square
Harrisburg, PA 17120
Phone: (717) 787-2567
Fax: (717) 772-1969
E-mail: adaubert@state.pa.us
(Counsel for Joel S. Ario,
Insurance Commissioner of the Commonwealth of
Pennsylvania)

Timothy P. Law, (215) 851-8100
Matthew D. Rosso
Toki Rehder
Reed Smith LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103
Phone: (215) 851-8100
Fax: (215) 851-1420
E-mail: tlaw@reedsmith.com
mrosso@reedsmith.com
trehder@reedsmith.com
(Counsel for Unisys Corporation and Tribune
Company, Lincoln National Corporation, Warrantech
et. al)

Samuel M. Danskin, (714) 918-7000
Green & Hall, APC
1851 E. First Street
10th Floor
Santa Ana, CA 92705
Phone: (714) 918-7000
Fax: (714) 918-6996
E-mail: sdanskin@greenhall.com
(Counsel for Brian and Sarah Chisick)

Henry M. Sneath, (412) 288-4000
Bridget M. Gillespie, (412) 288-4017
Picadio Sneath Miller & Norton, P.C.
4710 US Steel Tower
600 Grant Street
Pittsburgh, PA 15219-2702
Phone: (412) 288-4000
(412) 288-4017
Fax: (412) 288-2405
E-mail: hsneath@psmn.com
bgillespie@psmn.com
(Counsel for Washington Mutual Bank (“WAMU”),
as successor to Hawthorne Financial Corp. and
Hawthorne Saving, F.S.B.)

Stephen A. Loney, Jr., (267) 675-4600
Hogan & Hartson LLP
1835 Market Street
29th Floor
Philadelphia, PA 19103
Phone: (267) 675-4600
Fax: 267-675-4601
e-mail: saloney@hhlaw.com
(Counsel for Genworth Life Insurance Company and
Genworth Life and Annuity Insurance Company
(formerly General Electric Capital Assurance
Company, First Colony Life Insurance Life Insurance
Company, Federal Home Life Insurance Company,
and GE Life and Annuity Assurance Company) and
National Structured Settlements Trade Association)

Frank P. DeGiulio, (215) 625-9900
Charles P. Neely
Palmer Biezup & Henderson LLP
956 Public Ledger Building
620 Chestnut Street
Philadelphia, PA 19106-3409
Phone: (215) 625-9900
Fax: (215) 625-0185
e-mail: fpd@pbh.com
cneely@pbh.com
(Counsel for Republic Western Insurance Company)

Guaranty Association Service List

Betty S. Davis, Executive Director, (205) 823-4042
Alabama Insurance Guaranty Association
Phone:(205) 823-4042 Ext:
Fax:(205) 979-3578
Email:~Betty S. Davis, Executive Director~
<aiga01@bellsouth.net>
Suite 200
2020 Canyon Road
Birmingham, AL 35216

Michael E. Surguine, Executive Director, (602) 364-3863
Arizona Property and Casualty Insurance Guaranty Fund
Phone:(602) 364-3863 Ext:
Fax:(602) 364-3872
Email:~Michael E. Surguine, Executive Director~
<msurguine@azinsurance.gov>
Suite 270
1110 West Washington
Phoenix, AZ 85007

Steve A. Uhrynysz, Administrator, (501) 371-2776
Arkansas Property and Casualty Advisory Association
Phone:(501) 371-2776 Ext:
Fax:(501) 371-2774
Email:~Steve A. Uhrynysz, Administrator~
<steve.uhrynysz@arkansas.gov>
Suite 2
1023 West Capitol Avenue
Little Rock, AR 72201

Dave C. Edwards, President, 303-759-5066
Colorado Insurance Guaranty Association
Phone:303-759-5066 Ext:
Fax:303-759-5312
Email:~Dave C. Edwards, President~ <dedwards@wgfs.org>
Suite 408
1720 South Bellaire Street
Denver, CO 80222

John J. Falkenbach, Executive Director, 302-456-3656
Delaware Insurance Guaranty Association
Phone:302-456-3656 Ext:
Fax:302-456-3680
Email:~John J. Falkenbach, Executive Director~
<jfalkenbach@deiga.com>
Suite 309
220 Continental Drive
Newark, DE 19713

Susan R. Daniels, Fund Administrator, (907) 868-3999
Alaska Insurance Guaranty Association
Phone:(907) 868-3999 Ext:
Fax:(907) 868-3866
Email:~Susan R. Daniels, Fund Administrator~
<sdaniels@nadj.com>
Suite 100
1401 Rudakof Circle
Anchorage, AK 99508

Don Smith, Executive Director, 602-631-2300
Arizona State Compensation Fund
Phone:602-631-2300 Ext:
Fax:
Email:~Don Smith, Executive Director~ <dsmith@scfaz.com>
3030 North Third Street
Phoenix, AZ 85012

Wayne D. Wilson, Executive Director, 818-844-4300 Ext: 142
California Insurance Guarantee Association
Phone:818-844-4300 Ext:142
Fax:323782-1489
Email:~Wayne D. Wilson, Executive Director~
<wilsonw@CAIGA.ORG>
P.O. Box 29066
Glendale, CA 91209-9066

Paul M. Gulko, President, 800-852-2003
Connecticut Insurance Guaranty Association
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Paul M. Gulko, President, 800-852-2003
District of Columbia Insurance Guaranty Association
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Guaranty Association Service List

Sandy J. Robinson, Executive Director, 850-386-9200

Florida Insurance Guaranty Association, Incorporated
Phone:850-386-9200 Ext:
Fax:850-523-1887
Email:~Sandy J. Robinson, Executive Director~
<srobinson@agfgroup.org>
P.O. Box 14249
Tallahassee, FL 32317

Sandy J. Robinson, Executive Director, 850-386-9200

Florida Workers Compensation Insurance Guaranty Association
Phone:850-386-9200 Ext:
Fax:850-523-1887
Email:~Sandy J. Robinson, Executive Director~
<srobinson@agfgroup.org>
P.O. Box 14249
Tallahassee, FL 32317

Michael C. Marchman, Executive Director, 770-621-9835

Georgia Insurers Insolvency Pool
Phone:770-621-9835 Ext:
Fax:770-938-3296
Email:~Michael C. Marchman, Executive Director~
<mmarchman@gaiga.org>
Suite R
2177 Flintstone Drive
Tucker, GA 30084

Blake J. Obata, Administrator, (808) 525-1222

Hawaii Insurance Guaranty Association
Phone:(808) 525-1222 Ext:
Fax:(808) 532-1495
Email:~Blake J. Obata, Administrator~ <bobata@lava.net>
P.O. Box 4660
Honolulu, HI 96812-4660

Dave C. Edwards, President, 303-759-5066

Idaho Insurance Guaranty Association
Phone:303-759-5066 Ext:
Fax:303-759-5312
Email:~Dave C. Edwards, President~ <dedwards@wgfs.org>
Suite 408
1720 South Bellaire Street
Denver, CO 80222

Anne A. Sharp, Executive Director, (312) 422-9700

Illinois Insurance Guaranty Fund
Phone:(312) 422-9700 Ext:
Fax:(312) 422-9750
Email:~Anne A. Sharp, Executive Director~ <Asharp@IIGF.org>
Suite 1910
120 South LaSalle Street
Chicago, IL 60603

Janis B. Funk, Executive Director, 317-692-0574

Indiana Insurance Guaranty Association
Phone:317-692-0574 Ext:
Fax:317-264-2395
Email:~Janis B. Funk, Executive Director~
<jfunk@quadassoc.org>
Suite 1070
251 East Ohio Street
Indianapolis, IN 46204-2143

Kent M. Forney Esq., General Counsel, (515) 246-5812

Iowa Insurance Guaranty Association
Phone:(515) 246-5812 Ext:
Fax:(515) 246-5808
Email:~Kent M. Forney Esq., General Counsel~
<forney.kent@bradshawlaw.com>
Suite 3700
801 Grand Avenue
Des Moines, IA 50309-8004

Dave C. Edwards, President, 303-759-5066

Kansas Property & Casualty Insurance Guaranty Association
Phone:303-759-5066 Ext:
Fax:303-759-5312
Email:~Dave C. Edwards, President~ <dedwards@wgfs.org>
Suite 408
1720 South Bellaire Street
Denver, CO 80222

Scott Webster, Executive Director,

Kentucky Insurance Guaranty Association
Phone: Ext:
Fax:
Email:~Scott Webster, Executive Director~
<scott.webster@kyinsuranceguaranty.com>
Suite 101
10605 Shelbyville Road
Louisville, KY 40223

Guaranty Association Service List

John Wells, Director of Operations, 225-757-1688 Ext: 219
Louisiana Insurance Guaranty Association
Phone:225-757-1688 Ext:219
Fax:225-757-1699
Email:~John Wells, Director of Operations~ <jwells@laiga.org>
2142 Quail Run Drive
Baton Rouge, LA 70808-4126

Joseph R. Petr, President, 410-296-1620
Maryland Property & Casualty Insurance Guaranty Corporation
Phone:410-296-1620 Ext:
Fax:410-828-1265
Email:~Joseph R. Petr, President~ <jpetr@pcigc.com>
Suite 600
305 Washington Avenue
Towson, MD 21204-4715

Thomas R. Kujawa, Executive Director, 248-482-0381 Ext: 18
Michigan Property & Casualty Guaranty Association
Phone:248-482-0381 Ext:18
Fax:248-482-0388
Email:~Thomas R. Kujawa, Executive Director~
<tkujawa@mpcga.org>
P.O. Box 531266
Livonia, MI 48153-1266

Arthur Russell, Executive Director, 601-957-0072
Mississippi Insurance Guaranty Association
Phone:601-957-0072 Ext:
Fax:601-957-0087
Email:~Arthur Russell, Executive Director~ <arussell@msiga.net>
Suite 200
713 South Pear Orchard Road
Ridgeland,, MS 39157

Dave C. Edwards, President, 303-759-5066
Montana Casualty Insurance Guaranty Association
Phone:303-759-5066 Ext:
Fax:303-759-5312
Email:~Dave C. Edwards, President~ <dedwards@wgfs.org>
Suite 408
1720 South Bellaire Street
Denver, CO 80222

Paul M. Gulko, President, 800-852-2003
Maine Insurance Guaranty Association
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Paul M. Gulko, President, 800-852-2003
Massachusetts Insurers Insolvency Fund
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Paul Steffen, Executive Director, 952-831-1908
Minnesota Insurance Guaranty Association
Phone:952-831-1908 Ext:
Fax:952-831-1973
Email:~Paul Steffen, Executive Director~
<psteffen@tcinternet.net>
Suite 460
7600 Parklawn Ave
Edina, MN 55435

Charles F. Renn, Executive Director, (573) 634-8455
Missouri Property & Casualty Insurance Guaranty Association
Phone:(573) 634-8455 Ext:
Fax:(573) 634-8488
Email:~Charles F. Renn, Executive Director~ <MIGA@mo-
iga.org>
Suite 102
994 Diamond Ridge
Jefferson City, MO 65109

L. Dean Fletcher, Administrator, 402-483-2202
Nebraska Property and Liability Insurance Guaranty Association
Phone:402-483-2202 Ext:
Fax:402-483-2590
Email:~L. Dean Fletcher, Administrator~ <ldf3436p@aol.com>
Section C
PO Box 57006
Lincoln, NE 68505

Guaranty Association Service List

Bruce W. Gilbert, Executive Director, 702-368-0607
Nevada Insurance Guaranty Association
Phone:702-368-0607 Ext:
Fax:702-368-2455
Email:~Bruce W. Gilbert, Executive Director~ <BGilbert@niga-
pc.org>
Suite 100
3821 West Charleston Boulevard
Las Vegas, NV 89102-1859

Joseph L. DellaFera, Chief Executive Officer, 908-382-7100
New Jersey Property and Liability Insurance Guaranty
Phone:908-382-7100 Ext:
Fax:908-382-7150
Email:~Joseph L. DellaFera, Chief Executive Officer~
<jdellafera@njguaranty.org>
1st Floor
222 Mount Airy Road
Basking Ridge, NJ 07920

Grover E. Czech Esq., Executive Director, 973-622-6014
New Jersey Mutual Workers' Compensation Security Fund
Phone:973-622-6014 Ext:
Fax:973-297-1728
Email:~Grover E. Czech Esq., Executive Director~
<gczech@njcrib.com>
60 Park Place
Newark, NJ 07102

Dennis J. Hayes, Special Deputy Superintendent in Charge, 212-341-6707
New York Property/Casualty Security Funds
Phone:212-341-6707 Ext:
Fax:
Email:~Dennis J. Hayes, Special Deputy Superintendent in
Charge~ <dhayes@nylb.org>
2nd Floor
123 William Street,
New York, NY 10038

Dennis J. Hayes, Special Deputy Superintendent in Charge, 212-341-6707
New York Workers Compensation Security Fund
Phone:212-341-6707 Ext:
Fax:
Email:~Dennis J. Hayes, Special Deputy Superintendent in
Charge~ <dhayes@nylb.org>
2nd Floor
123 William Street,
New York, NY 10038

Paul M. Gulko, President, 800-852-2003
New Hampshire Insurance Guaranty Association
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Joseph L. DellaFera, Chief Executive Officer, 908-382-7100
New Jersey Surplus Lines Guaranty Fund
Phone:908-382-7100 Ext:
Fax:908-382-7150
Email:~Joseph L. DellaFera, Chief Executive Officer~
<jdellafera@njguaranty.org>
1st Floor
222 Mount Airy Road
Basking Ridge, NJ 07920

Gary M. Keenan, Fund Administrator, 505-293-6600
New Mexico Insurance Guaranty Association
Phone:505-293-6600 Ext:
Fax:505-293-6400
Email:~Gary M. Keenan, Fund Administrator~ <gkeen@keen-
assoc.com>
P.O. Box 14590
Albuquerque, NM 87191-4590

Dennis J. Hayes, Special Deputy Superintendent in Charge, 212-341-6707
New York Public Motor Vehicle Liability Security Fund
Phone:212-341-6707 Ext:
Fax:
Email:~Dennis J. Hayes, Special Deputy Superintendent in
Charge~ <dhayes@nylb.org>
2nd Floor
123 William Street,
New York, NY 10038

Raymond F. Evans Jr., Managing Secretary, 919-783-9813
North Carolina Insurance Guaranty Association
Phone:919-783-9813 Ext:
Fax:919-783-0355
Email:~Raymond F. Evans Jr., Managing Secretary~
<rfe@ncrb.org>
P.O. Box 176010
Raleigh, NC 27619-6010

Guaranty Association Service List

Jeffry J. Cahill, Managing Secretary, 701-224-9555

North Dakota Insurance Guaranty Association
Phone:701-224-9555 Ext:
Fax:701-258-9632
Email:~Jeffry J. Cahill, Managing Secretary~
<jsc46@bis.midco.net>
P.O. Box 2634
Bismarck, ND 58502-2634

Larry W. Fitch CIC, General Manager, 405-843-5454

Oklahoma Property & Casualty Insurance Guaranty Association
Phone:405-843-5454 Ext:
Fax:405-843-5369
Email:~Larry W. Fitch CIC, General Manager~
<LWFitch@opciga.org>
Suite 330E
2601 Northwest Expressway
Oklahoma City, OK 73112

Stephen F. Perrone, Executive Director, 215-568-1007 Ext: 18

Pennsylvania Property & Casualty Insurance Guaranty Association
Phone:215-568-1007 Ext:18
Fax:215-568-0736
Email:~Stephen F. Perrone, Executive Director~
<sperrone@ppciga.org>
One Penn Center, Suite 1850
1617 J. F. Kennedy Blvd
Philadelphia, PA 19103

Jose E. Camacho Postigo, Executive Director, (787) 775-1122

Puerto Rico Property and Casualty Insurance Guaranty Association
Phone:(787) 775-1122 Ext:
Fax:(787) 775-1138
Email:~Jose E. Camacho Postigo, Executive Director~
<priga@attglobal.net>
P.O. Box 364967
San Juan, PR 00936-4967

J. Smith Harrison Jr., Executive Director, 803-744-4319

South Carolina Property & Casualty Insurance Guaranty Association
Phone:803-744-4319 Ext:
Fax:803-779-0324
Email:~J. Smith Harrison Jr., Executive Director~
<smitty@scwind.com>
P.O. Box 407
Columbia, SC 29202

Frank A. Gartland, President, 614-442-6601

Ohio Insurance Guaranty Association
Phone:614-442-6601 Ext:
Fax:614-442-0004
Email:~Frank A. Gartland, President~ <fgart@rrcol.com>
1840 Mackenzie Drive
Columbus, OH 43220

David C. Johnson, Administrator, 503-641-7132

Oregon Insurance Guaranty Association
Phone:503-641-7132 Ext:
Fax:503-641-7127
Email:~David C. Johnson, Administrator~
<djohnson.oiga@verizon.net>
Suite 426
10700 S W Beaverton Highway
Beaverton, OR 97005

Steve Harman, Director, 717-783-8093 Ext: 3103

Pennsylvania Workers' Compensation Security Fund
Phone:717-783-8093 Ext:3103
Fax:717-705-0140
Email:~Steve Harman, Director~ <sharman@state.pa.us>
Capital Associates Building
901 N 7th Street
Harrisburg, PA 17102

Paul M. Gulko, President, 800-852-2003

Rhode Island Insurers' Insolvency Fund
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Edwin E. Evans Esq., Managing Secretary, 605-336-2880

South Dakota Insurance Guaranty Association
Phone:605-336-2880 Ext:
Fax:605-335-3639
Email:~Edwin E. Evans Esq., Managing Secretary~
<eevans@dehs.com>
P.O. Box 1030
Sioux Falls, SD 57101-1030

Guaranty Association Service List

W. Davidson Broemel, Executive Secretary, 615-724-3212

Tennessee Insurance Guaranty Association
Phone:615-724-3212 Ext:
Fax:615-724-3312
Email:~W. Davidson Broemel, Executive Secretary~
<dbroemel@burr.com>
Suite 680
1600 Division Street
Nashville, TN 37203

Allen J. Muhlestein, Executive Director, 801-984-1850

Utah Property & Casualty Insurance Guaranty Association
Phone:801-984-1850 Ext:
Fax:801-984-1851
Email:~Allen J. Muhlestein, Executive Director~
<amuhl@xmission.com>
P. O. Box 1626
Sandy, UT 84091-1608

Raymond L. Fournier, Executive Director, 340-776-8050

US Virgin Islands Insurance Guaranty Association
Phone:340-776-8050 Ext:
Fax:340-774-8095
Email:~Raymond L. Fournier, Executive Director~
<rlfournier@guardianinsurance.com>
PO Box 9109
St. Thomas, USVI 00801

Dave C. Edwards, President, 303-759-5066

Washington Insurance Guaranty Association
Phone:303-759-5066 Ext:
Fax:303-759-5312
Email:~Dave C. Edwards, President~ <dedwards@wgfs.org>
Suite 408
1720 South Bellaire Street
Denver, CO 80222

Randy Blumer, Executive Director, 608-242-9473

Wisconsin Insurance Security Funds
Phone:608-242-9473 Ext:
Fax:608-242-9472
Email:~Randy Blumer, Executive Director~ <Randy@wisf-
madison.org>
Suite 135
2820 Walton Commons West
Madison, WI 53718-6797

Marvin Kelly, Executive Director, 512-345-9335

Texas Property & Casualty Insurance Guaranty Association
Phone:512-345-9335 Ext:
Fax:512-795-0447
Email:~Marvin Kelly, Executive Director~ <mkelly@tpciga.org>
9120 Burnet Road
Austin, TX 78758

Paul M. Gulko, President, 800-852-2003

Vermont Property & Casualty Insurance Guaranty Association
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Paul M. Gulko, President, 800-852-2003

Virginia Property & Casualty Insurance Guaranty Association
Phone:800-852-2003 Ext:
Fax:617-305-0001
Email:~Paul M. Gulko, President~ <pgulko@gfms.org>
One Bowdoin Square
Boston, MA 02114-2916

Frank A. Gartland, President, 614-442-6601

West Virginia Insurance Guaranty Association (WVIGA)
Phone:614-442-6601 Ext:
Fax:614-442-0004
Email:~Frank A. Gartland, President~ <fgart@rrcol.com>
1840 Mackenzie Drive
Columbus, OH 43220

Dave C. Edwards, President, 303-759-5066

Wyoming Insurance Guaranty Association
Phone:303-759-5066 Ext:
Fax:303-759-5312
Email:~Dave C. Edwards, President~ <dedwards@wgfs.org>
Suite 408
1720 South Bellaire Street
Denver, CO 80222