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8			
9	BEFORE THE INSURANCE COMMISSIONER		
10	OF THE STATE OF CALIFORNIA		
11			
12	In the Matter of the Rates Charged, Rating Plan,		
13	Rating Systems, Rates and Underwriting Rules of,	CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING	
14		OF NONCOMPLIANCE AND ORDER TO	
15	Government Employees Insurance Company	SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION	
16	and its affiliates,	TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR	
17		COMPENSATION	
18	Respondent.		
19		[Ins. Code §§ 1858, 1861.10, and 790.05; Cal. Code Regs., tit. 10, §§ 2653.1, 2661.2, 2661.3 and 2661.4]	
20		and 2001. 1]	
21			
22	The Consumer Federation of California ("CFC") hereby requests that the Insurance	
23	Commissioner ("Commissioner") issue a Notice	of Noncompliance pursuant to California	
24	Insurance Code section 1858.1 and an Order to S	show Cause pursuant to Insurance Code section	
25	790.05 with regard to the conduct of GEICO Cas	sualty Company, GEICO General Insurance	
26	Company, GEICO Indemnity Company, and Go	vernment Employees Insurance Company	
27	(hereinafter, collectively referred to as "GEICO") and schedule a hearing pursuant to Insurance	
28	Code section 1858.01(b).		
	CONSUMER FEDERATION OF CALIFORNIA'S PETON ORDER TO SHOW CAUSE, PETITION FOR HEAR INTERVENE, AND NOTICE OF INTENT TO	ING, PETITION TO PARTICIPATE, PETITION TO	

CFC hereby also requests, pursuant to Insurance Code section 1861.10(a) and 10 CCR sections 2661.3 and 2661.4, that it be granted leave to intervene and participate in the proceeding on GEICO's noncompliance and any proceeding to enforce the sections of Proposition 103 discussed *infra*. CFC intends to seek compensation in any such proceeding. Pursuant to 10 CCR section 2661.3(c), CFC has attached its proposed budget hereto as Exhibit A.

GEICO, through its auto insurance subsidiaries, insures approximately one million California policyholders, deriving more than one billion dollars in annual premium. While many other major insurers have hundreds or thousands of agents and offices in California, GEICO only has nine agents, located in eight offices statewide. Rather than deploying a producer-based approach to sales, GEICO is primarily a direct writer of auto insurance (with 96% of its business sold by this marketing system²) and uses its internet website - www.geico.com - as its primary mechanism for interacting with prospective customers. With a \$1.18 billion national advertising campaign – the highest advertising ratio reported in the automobile insurance industry - GEICO aggressively promotes its strategy for online premium quotes and sales at the company's website.

As is detailed below, CFC believes that GEICO maintains an ongoing practice of discrimination against California "good drivers" (as defined in Insurance Code section 1861.025) based on their marital status, occupation, level of educational attainment, and history of insurance converage. CFC's website testing has found that GEICO currently misrepresents the lowest level of coverage available to customers who are unmarried, are unemployed or employed in occupations with lower wages, have not attained a four year college degree and have had gaps in insurance coverage.

¹ <u>https://www.geico.com/insurance-agents/california/</u>

² GEICO 2013 California Auto Rule filing SERRF # GECC-128785615.

³ "GEICO's Advertising Spending Slows But Still Tops \$1 Billion: SNL"; <u>Insurance Journal</u>, March 20, 2014, *available at*: http://www.insurancejournal.com/news/national/2014/03/20/323788.htm.

For example, a single woman living in Inglewood, California with a perfect driving record who works as a cashier, has a high school degree, and currently has auto isurance, is offered a "Lowest Limits" quote on GEICO's website that provides \$15,000 liability bodily injury coverage per injury, \$30,000 liability bodily injury coverage per accident, and \$25,000 liability property damage coverage per accident, at \$223.08 for a six month period. (*See* Exhibit B). However, if that very same woman responds to GEICO's website inquiry that she doesn't currently have auto insurance coverage, she is offered a "Lowest Limits" policy with \$100,000 liability bodily injury coverage per injury, \$300,000 liability bodily injury coverage per accident, and \$50,000 liability property damage coverage per accident, for \$343.48 over six months -- a 54 percent difference in price. (*See* Exhibit C).

Furthermore, CFC's testing has determined that GEICO has engaged in a historical practice of misleading or misrepresenting the lowest level of coverage available to unmarried *women*, irrespective of level of educational attainment, who do not have current insurance coverage, or have had lapses in coverage, and who are unemployed or engaged in jobs or occupations that generate low and moderate incomes, when those customers seek a premium quote at GEICO's website. (*See* Exhibit D, which presents the results of a test conducted on or about October 17, 2014). During this historical period in which certain women faced unfair discrimination irrespective of their level of education, CFC believes, and will present supporting evidence during a hearing to demonstrate, that GEICO was discriminating on the basis of sex. CFC intends to elicit information identifying the duration of this additional discrimination during discovery.

CFC further believes that GEICO's past and present conduct violates several other provisions of California law by virtue of the information it provides and the offers it makes to customers through its internet website.

This petition is based on CFC's preliminary analysis of GEICO's practices based on available information. CFC reserves the right to modify, withdraw and/or add issues for consideration during this proceeding as more information becomes available.

In support of its petitions, CFC alleges:

CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION - 3

I. ALLEGED CONDUCT AND EVIDENCE

- 1. California law requires insurance companies to offer all good drivers the minimum limits automobile insurance coverage prescribed by law. Insurance companies cannot use a customer's history of prior insurance coverage in the rating or underwriting of auto insurance, nor can a company use a customer's occupation or level of education as a rating factor in setting auto insurance premiums. Insurance companies can neither deceive nor mislead by their representations to customers. Insurance companies cannot violate the Unruh Civil Rights Act. GEICO and its affiliates have engaged in practices that violate these laws.
- 2. Based upon CFC's extensive research, analysis and additional evidence it intends to elicit in this proceeding, CFC alleges that GEICO's past and current practices have consistently and illegally deceived and misled certain prospective customers who have visited the company's website to research and obtain insurance coverage as to the cost and availability of policies of automobile insurance that are available to them. Specific examples are provided herein, and a detailed description of the methodology CFC used to make these determinations is provided in Section II.
 - a. Violation of Insurance Code § 1861.15(a): GEICO Discriminates by Not Offering the Lowest Coverage Limits Available.
- 3. Insurers in California *must* offer "persons who qualify for a good driver discount... automobile liability coverage in the minimum financial responsibility coverage amounts..." as specified in section 16056 of the Vehicle Code. Cal. Ins. Code § 1861.15(a). These statutory minimum coverage amounts are \$15,000 for injury or death to one person, \$30,000 for injury or death to more than one person per accident and \$5,000 for damage to property. Cal. Veh. Code § 16056. (Hereinafter, a "statutory minimum limits policy"). GEICO sells a statutory minimum limits policy to "good drivers" as defined in Insurance Code Section 1861.025.
- 4. However, certain visitors to GEICO's website are *not* offered the good driver minimum policy even though they qualify for the "good driver" discount. Instead, this subset of

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prospective customers, described further below, is provided a quote for substantially higher limits coverage that is presented as providing the "Lowest Limits" coverage available.

- 5. At the requested public hearing, CFC will present evidence in the form of the results of its extensive testing, described in Section II, *infra*, showing GEICO's variables in determining who is targeted for this treatment. Current victims of GEICO's discrimination are customers who qualify as "good drivers" under California law for a statutory minimum limits policy and are:
 - Unmarried;
 - Are unemployed or are engaged in occupations that generate low or moderate incomes and can be described as "working class," "blue collar," or "unskilled" (hereinafter, "working class");
 - Have attained, with respect to their education, at most an Associate degree; and,
 - Have no current insurance or have gaps in past insurance coverage.

These customers, when visiting Geico.com and using the online premium quote tool, are offered a much higher-than-minimum limit policy that is prominently and illegally represented by GEICO as having the "Lowest Limits."

- 6. Prospective customers who are targeted for discrimination are presented a quote for a "Lowest Limits" policy that provides the following coverage:
 - \$100,000 liability bodily injury coverage per injury;
 - \$300,000 liability bodily injury coverage per accident;
 - \$50,000 liability property damage coverage per accident;
 - \$100,000 uninsured and underinsured motorists bodily injury coverage per injury;
 - \$300,000 uninsured and underinsured motorists bodily injury coverage per accident; and,
 - \$3,500 uninsured motorist property damage coverage.

(Hereinafter, a "100/300/50 policy"). The policy they are offered has a premium that is 40 to 54 percent higher than that quoted to customers not victimized by this practice. These coverage

limits far exceed the statutory minimum limits policy to which these customers are entitled under Insurance Code section 1861.15(a).

- 7. Instead of being offered a statutory minimum limits policy, for example, a California visitor to GEICO's website who is unmarried, with a high school diploma who works as a retail cashier and has not been continuously insured, will be offered a 100/300/50 policy that is represented as being the "Lowest Limits" available. Although this level of coverage far exceeds the mandated statutory minimum limits policy that GEICO is required by law to offer and sell in California, the company displays the premium for this coverage under a bright orange tab labeled "Lowest Limits*" placed in the top left of the web page. The asterisk next to the phrase "Lowest Limits" directs the customer to the following *incorrect* and *deceptive* information: "The 'Lowest Limits' package quote includes the lowest bodily injury limits that we offer in your state, but may not represent the lowest limits available for other coverages, nor the lowest possible deductibles." (*See* Exhibit E).
- 8. The "Lowest Limits" offer made to customers victimized by GEICO's illegal practice not only exceeds the actual lowest limits available, it also substantially exceeds the standard "Lowest Limits" quote provided to those customers *not* victimized by this targeted practice. Prospective customers not victimized by GEICO's intentional misrepresentation described above receive a quote for coverage providing:
 - \$15,000 liability bodily injury coverage per injury,
 - \$30,000 liability bodily injury coverage per accident, and,
 - \$25,000 liability property damage coverage per accident. 4

(Hereinafter a "15/30/25" policy).

⁴ As is discussed in subsection (b), *infra*, GEICO is also violating California law through its presentation of this package as the lowest limits available. Pursuant to California Vehicle Code §16056 (a) the minimum financial responsibility limits require only five thousand dollars (\$5,000) in liability physical damage coverage, as opposed to the \$25,000 coverage offered by GEICO in its default lowest limits quote. Pursuant to California Insurance Code §1861.15, all insurers are required to offer good drivers "coverage in the minimum financial responsibility coverage amounts."

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irrespective of their level of educational attainment, who were also unmarried, working class, and did not have current insurance coverage or had lapses in coverage.

b. Violation of Insurance Code § 1861.15(a), § 1861.03(a) and Business & Professions Code § 17507; GEICO Does Not Offer the Lowest Property

Damage Coverage Limits Available to Many of Its Prospective Customers.

10. As discussed *supra*, insurers are required to offer automobile liability coverage in the minimum financial responsibility coverage amounts to qualified good drivers. Insurance Code § 1861.15(a). Through Insurance Code section 1861.03(a), insurers are also subject to the requirements of California Business and Professions Code section 17507, which makes clear that price disclosures ("the relationship between the price and particular article of merchandise or type of service") by means of asterisks do "not meet the requirement of clear and conspicuous identification..." In addition to currently discriminatorily misrepresenting the lowest coverage limits available to unmarried customers of both sexes who have not attained a four-year college degree, and historically to unmarried female "good drivers" in working class occupations irrespective of education, GEICO also misrepresents the lowest property damage limits available to *any* other customer for whom GEICO's website premium quote system produces a 15/30/25 quote in response to the customer's online responses.

Furthermore, in the course of its website testing at Geico.com, CFC has

determined and will demonstrate at a hearing that, at a minimum, between September 19, 2014

and at least October 21, 2014, GEICO's discrimination solely targeted female customers,

11. Through its website testing at Geico.com, CFC has determined that prospective customers who are married, employed in professional or executive occupations, or hold a Bachelor degree are presented a quote for GEICO's 15/30/25 policy if they did not have prior coverage or if their current insurance coverage limits are \$15,000/\$30,000. While the liability bodily injury coverage for the 15/30/25 policy GEICO offers meets the statutory minimum limits mandated by Vehicle Code section 16056(a), the liability property damage coverage exceeds what is required by a factor of five.

- that this higher-than-minimum property damage coverage is the "Lowest Limit[]" available to them, with an asterisk immediately following this statement. (See Exhibit F). That asterisk leads to a statement lower on the webpage that states: "The 'Lowest Limits' package quote includes the lowest bodily injury limits that we offer in your state, but may not represent the lowest limits available for other coverages, nor the lowest possible deductibles." (See also Exhibit F). This language does not constitute a meaningful disclosure, as it serves to obscure the truth about the lowest limits coverage available to a customer as required by law. By first placing information relevant to a customer's decision making process in a fine print asterisk, and then using qualifying and equivocating language in those fine print statements ("may not represent...") and failing to explicitly name the lower limits property damage coverage available by law, GEICO is compounding customer confusion in the course of an already potentially complex transaction.
- 13. Business and Professions Code section 17507 makes clear that "[d]isclosure ...by means of an asterisk or other symbol, and corresponding footnote, does not meet the requirement of clear and conspicuous identification..." Higher limits mean higher prices, and this inconspicuous information has a direct bearing on the price of the automobile insurance policy customers seek to purchase. Through this conduct, GEICO violates Insurance Code section 1861.15(a) by misrepresenting the lowest available coverage to qualified good drivers.
 - c. Violation of Insurance Code § 1861.02(c); GEICO Impermissibly Uses Prior History of Insurance Coverage to Unfairly Discriminate Against Certain Good Drivers.
- 14. CFC's testing has revealed that GEICO is currently engaged in violations of Proposition 103's explicit ban on the use of prior insurance coverage: "[t]he absence of prior automobile insurance coverage, in and of itself, shall not be a criterion for determining eligibility for a Good Driver Discount policy, or generally for automobile rates, premiums, or insurability...." Cal. Ins. Code § 1861.02(c). Yet, in the face of this prohibition, GEICO misrepresents to unmarried customers in working class occupations who do not have a four-year degree and have not been continuously insured that the 100/300/50 policy it offers them

represents the "Lowest Limits" available. These customers are entitled to a statutory minimum limits policy as "good drivers." When the same customer applies to Geico.com for a premium quote, but states that he or she has been continuously insured, GEICO will offer them a 15/30/25 policy.

- 15. For example, a single man living in Stockton with a perfect driving record who works as a cashier, graduated high school, and who has current insurance coverage of \$15,000/\$30,000, is offered a "Lowest Limits" quote on GEICO's website for a 15/30/25 policy at 179.78 for a six-month period. (*See* Exhibit G). Yet, if that very same man indicates to GEICO's website that he does not have current insurance coverage, he is offered a 100/300/50 policy, described as a "Lowest Limits" policy, for \$262.08 over six months -- a 46 percent difference in price. (*See* Exhibit H).
- 16. Furthermore, from September 19, 2014 until October 21, 2014, at a minimum, GEICO illegally used history of insurance coverage to determine the coverage and premium quote it would offer in a slightly different manner than its current illegal use. During this time period, at least, GEICO misrepresented its 100/300/50 policy as the "Lowest Limits" coverage exclusively to female customers, irrespective of education, who were not currently insured. During this time period all male customers who were currently uninsured were offered a 15/30/25 "Lowest Limits" quote. CFC expects to elicit the exact duration of this sex-specific violation of Insurance Code section 1861.02 (c) through discovery at the requested hearing.
- 17. This violation does not affect all prospective customers who visit Geico.com. Some, apparently preferred, customers with a lack or lapse of prior coverage are presented a quote for GEICO's 15/30/25 policy irrespective of their coverage history. The class of people not victimized by GEICO's illegal practice includes drivers who are married, have higher levels of education, or are in occupations that can be typically described as "professional," "managerial," or "executive." The systematic, pernicious, and illicit use of prior insurance history specifically targets unmarried, less-educated Californians working in blue-collar jobs and those not in the workforce.

d. Violation of Insurance Code § 1861.15(a) and § 1861.02(a); GEICO Illegally Uses Occupation to Deny Good Drivers Access to a Minimum Limits Policy.

- 18. Insurers are required to offer qualified customers "a good driver discount... in the minimum financial responsibility coverage amounts...." Cal. Ins. Code § 1861.15(a). GEICO, at its website, illegally denies prospective customers who qualify for a good driver discount an offer of a statutory minimum limits policy if the prospective customer refuses to provide personal information regarding their occupation.
- 19. Insurers may consider only an insured's driving safety record, the number of miles they drive annually, and number of years of driving experience in setting rates, as well as any "other factors that the commissioner may adopt" that have "a substantial relationship to the risk of loss" as determined by the Insurance Commissioner and enumerated in 10 California Code of Regulations section 2632.5. Cal. Ins. Code § 1861.02(a)(1-4). In spite of these limited rating factors, GEICO's system for providing a website quote requires information from customers that cannot be used for rating a policy and, therefore, cannot be used to determine whether a good driver is offered a statutory minimum limits policy. CFC, at the requested hearing, will present evidence that GEICO is impermissibly using policyholders' occupation as a factor for determining eligibility for the mandatory offer of a statutory minimum limits policy to a good driver.
- 20. As CFC will demonstrate, a consumer cannot obtain an auto insurance quote on GEICO's website without providing his or her occupation. A consumer is forced to choose from a list of employment sectors on a drop down menu on GEICO's online quote calculator. The consumer is then required to name his or her occupation from among a list of possible occupational matches. A consumer cannot proceed to the completion of the website form to receive a rate quote without providing this information.
- 21. CFC's testing has determined that GEICO refuses to make available a policy to a customer who is unwilling to disclose their occupation information. Since occupation is not a permissible rating factor, GEICO effectively denies a good driver a statutory minimum limits policy to which he or she has a right by refusing to offer based on an unlawful factor.

- e. Violation of Insurance Code § 1861.15(a) and § 1861.02(a); GEICO Illegally Uses Education to Deny Good Drivers Access to a Minimum Limits Policy.
- 22. As discussed in section I(a), *supra*, insurers are required to offer qualified customers a good driver discount in the minimum financial responsibility coverage amounts (Cal. Ins. Code § 1861.15(a)) and may only consider a limited number of factors relating to the customer when setting rates. Cal. Ins. Code § 1861.02(a)(1-4). Education is not one of these factors. However, it is not possible for a customer trying to use GEICO's online rate quote tool to proceed without disclosing their educational background, even though that is not an allowable factor and, therefore, not required for the purpose of calculating and offering a minimum limits quote as required by law. Consumers are presented with a list of gradually increasing levels of educational attainment, i.e., some high school, high school, some college, etc. Consumers *must* select the level of education they have attained before GEICO's website quote tool will allow them to proceed further.
- 23. CFC's testing has determined that GEICO refuses to make available a policy to a customer who is unwilling to disclose their educational background. Since education is not an approved rating factor, GEICO denies a good driver a statutory minimum limits policy to which he or she has a right by refusing to offer based on an unlawful factor.
 - f. Violation of Insurance Code § 1861.02(a)(1-4); GEICO is Impermissibly and Discriminatorily Using Occupation as a Rating Factor.
- 24. In setting insurance rates, insurers may consider an insured's driving safety record, the number of miles they drive annually, number of years of driving experience, and any "other factors that the commissioner may adopt" that have "a substantial relationship to the risk of loss." Cal. Ins. Code § 1861.02(a)(1-4). These are enumerated in 10 California Code of Regulations section 2632.5. Furthermore, California regulations define a rating factor "as any factor, *including discounts*, used by an insurer which establishes or affects the rates, premiums, or charges assessed for a policy of automobile insurance." 10 CCR § 2632.2. (Emphasis added.)
- 25. CFC, at the requested hearing, will present evidence that, in spite of this clear enumeration of approved rating factors and the clear incorporation of "discounts" in the CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION 11

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- 26. Those not in the preferred occupations do not receive an "Occupation Discount." (See Exhibit K). GEICO is not approved to alter premiums via an Occupation Discount or a lack thereof, and such a rating factor would be impermissible in any case as it is not an approved rating factor. While GEICO's Class Plan (SERFF Tracking #: GECC-126833509) discloses a "rate differential" that applies to customers who are part of certain purported affinity groups, GEICO pointedly revised its Plan to clarify that the professional group to which one belongs does not lead to "discounts." In the above-referenced 2010 Class Plan filing, GEICO deleted the term "discounts" in relation to affinity groups, reserving discounts exclusively for approved rating factors. (See, for example, pg. 225 as shown in Exhibit L). GEICO's disclosure to customers that they are receiving an occupation discount conflicts with both the filed Class Plan and the law. Therefore, by application of this rating factor, GEICO violates Insurance Code Section 1861.02 (a)(4), the corresponding regulations, and its approved Class Plan.
- 27. In addition to the improper application of an occupation discount, GEICO's use of occupation to determine the coverage and associated price charged to a customer also violates Insurance Code section 1861.02(a)(4). If a would-be customer identifies as an unmarried, lesseducated person without prior insurance coverage, she is offered a 100/300/50 policy, represented by GEICO as the "Lowest Limits," if she is in a working class profession, or not in the workforce. If, however, the same person without prior insurance is in a category of CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND

ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION - 12

occupations that can be described as typically professional, managerial or executive, she is offered a significantly lower priced 15/30/25 "Lowest Limits" policy.

- 28. For example, a woman living in Fresno with a perfect driving record, who works as a vice president in a private company and has no prior insurance, will be offered a "Lowest Limits" quote on GEICO's website for a 15/30/25 policy at \$162.18 for a six month period. If that same woman indicates to GEICO's website that she instead works as a *cashier*, she will be offered a 100/300/50 policy, described as a "Lowest Limits" policy, for \$289.68 over six months a 79 percent difference in price, of which approximately one-fifth is due to the "occupation discount" and the remainder is attributable to the failure to offer true lowest limits coverage to the customer based on her occupation.
- 29. By effectively denying customers, on the basis of their occupations, access to a coverage and premium to which they have a statutory right, as well as by representing to customers that an occupation discount is available, GEICO is using an impermissible and unapproved factor for the rating, underwriting, offering and pricing of policies, or some combination thereof.
 - g. Violation of Insurance Code § 1861.02(a)(1-4); GEICO is Impermissibly and Discriminatorily Using Education as a Rating Factor.
- 30. As discussed above, insurers may consider driving safety record, miles driven annually, years of driving experience, and any "other factors that the commissioner may adopt" that have "a substantial relationship to the risk of loss" in setting rates, as enumerated in 10 CCR section 2632.5. Cal. Ins. Code § 1861.02(a)(1-4). California regulations also define a rating factor "as any factor, including discounts, used by an insurer which establishes or affects the rates, premiums, or charges assessed for a policy of automobile insurance." 10 CCR § 2632.2. Level of education is not among these permitted rating factors.
- 31. GEICO is using level of educational attainment to discriminate against unmarried customers who are employed in working class professions and have had gaps in past insurance coverage. In the course of applying for a premium quote on Geico.com, customers are presented with a list of gradually increasing levels of educational attainment. If targeted customers select CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND

ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION - 13

CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION - 14

any level of education below a four year "bachelor's degree", they will be offered coverage that greatly exceeds the statutory minimum coverage limits to which they would otherwise be entitled.

- 32. For example, if an unmarried customer employed in a working class occupation with no prior insurance coverage (or no continuous insurance coverage) indicates that he or she has a high school degree, GEICO will offer that customer a 100/300/50 policy. If that same customer indicates that they have an Associate degree or selects the option "Associate, pursuing Bachelors Degree," then he or she too will be offered a 100/300/50 policy. Only when that same customer indicates that he or she has a four-year bachelor's degree or higher will he or she be offered a 15/30/25 "Lowest Limits" policy.
- 33. A customer's level of educational attainment is an unapproved rating factor and the use of which for determining whether or not to offer a "Lowest Limits" policy (which, as noted above, is misrepresented as being the lowest limits available to a customer) is a violation of Insurance Code section 1861.02(a). By charging customers different premiums for "Lowest Limits" coverage on the basis of their educational attainment and by misleading certain customers regarding their access to a level of coverage and a premium to which they have a statutory right on that same basis, GEICO is using education as an unauthorized factor for the rating, underwriting, offering and pricing of policies, or some combination thereof.
 - h. Violation of Insurance Code § 1861.05(a); Through its Practices, GEICO
 Charges an Unfairly Discriminatory Rate.
- 34. Insurance Code 1861.05 forbids any rate to "remain in effect which is... unfairly discriminatory or otherwise in violation of [Chapter 9, Article 10 of the Insurance Code]." From a consumer standpoint, the premium charged for the "Lowest Limits" coverage offered to a good driver should be exactly the same for two drivers with the exact same risk profile, as determined by application of approved rating factors. Yet, because of GEICO's misleading and illegal practices, two identical risks seeking coverage from GEICO are offered different rates for "Lowest Limits" coverage depending upon certain personal characteristics that are not approved rating factors; this is unfair discrimination pursuant to Insurance Code section 1861.05.

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is unfair discrimination per se.

education described as "Associate, pursuing Bachelors Degree," she will be offered a 100/300/50 policy, described as a "Lowest Limits" policy, for \$ 257.98 over six months. (*See* Exhibit N). Each of these customers shares the same risk profile. Yet owing to their respective education level (a personal characteristic not approved as a rating factor as discussed above), GEICO charges one customer a 40 percent higher price for a policy presented to both of them as the "Lowest Limits" offer. As California good drivers, both of these customers are entitled to the same minimum limit policy and refusing to offer two similar risks the same policy is unfair discrimination.

36. GEICO's practice of refusing to offer the minimum limits coverage to some good

as a retail cashier, has a bachelor's degree and is not currently insured, will be offered a "Lowest

Limits" quote on GEICO's website for a 15/30/25 policy at \$183.28 for a six month period. (See

Exhibit M). If that same woman indicates to GEICO's website that she has attained a level of

For example, a woman living in Poway with a perfect driving record, who works

i. Violation of Civil Code § 51.6(b); Through its Practices, GEICO Discriminates Based on Marital Status.

drivers, while offering lower limits to other good drivers who have the same risk characteristics,

- 37. Insurance Code section 1861.03(a) subjects insurance companies to the Unruh Civil Rights Act (Civil Code sections 51 to 53). Civil Code section 51 is clear that "[a]ll persons... are free and equal" and that regardless of "their sex... are entitled to the full and equal services in all business establishments of every kind whatsoever." CFC, at the requested hearing, will offer evidence based on its testing that GEICO has, and continues to, discriminate against customers based on their marital status.
- 38. CFC will offer evidence demonstrating that GEICO maintains a practice of discriminating against unmarried customers in working class professions, with gaps in past insurance coverage, who do not have a four-year degree. These customers will be offered a 100/300/50 policy if they provide information to Geico.com that they are unmarried. For example, a married woman living in San Bruno with a perfect driving record, who works as a

cashier and has no prior insurance, would have been offered a "Lowest Limits" quote on GEICO's website for a 15/30/25 policy at \$198.18 for a six month period. (See Exhibit O). If that same woman tells GEICO's website that she is unmarried (either because she is single, divorced, or widowed), she will be offered a 100/300/50 policy, described as a "Lowest Limits" policy, for \$338.08 over six months. This represents a 71 percent difference in price between the two quotes. (See Exhibit P).

- 39. While marital status is an approved rating factor (and appears to account for a \$38 difference in premium between these two examples), GEICO is discriminating based on marital status when it determines which "good drivers" are to receive an offer of a true "Lowest Limits" policy. ⁵
- 40. Solely because of their marital status, unmarried visitors to GEICO's website are wrongly offered a so-called "Lowest Limits" policy with coverage limits that do not comply with California law, as compared to other married customers when all other characteristics and risk factors are held constant. In doing so, GEICO denies equal services to persons based on their marital status.

j. Violation of Civil Code § 51.6(b); Through its Practices, GEICO Has Discriminated Based on Sex.

41. As noted above, Insurance Code section 1861.03(a) applies the Unruh Civil Rights Act to insurance companies, which makes clear that "[a]ll persons... are free and equal" and that regardless of "their marital status... are entitled to the full and equal services in all business establishments of every kind whatsoever." CFC, at the requested hearing, will offer evidence based on its testing that GEICO, with its past practice 6 of applying the discriminatory

⁵ Discussed in subsection (b) above; even this true "Lowest Limits" policy is only accurate with respect to bodily injury liability coverage.

⁶ CFC's testing indicates that this period spanned, at a minimum, from September 19, 2014, until October 21, 2014. CFC expects to establish the precise bounds of this timeframe through discovery at the requested hearing.

practices discussed above to women only, and consequently offering higher premiums and coverage levels to them than they would otherwise be entitled, has necessarily discriminated according to sex.

- 42. For example, during the period of sex discrimination, a man with a perfect driving record who lived in San Francisco, worked as a cashier and who did not have current insurance, was offered a "Lowest Limits" quote on GEICO's website for a 15/30/25 policy at \$212.08 for a six month period. (*See* Exhibit Q). A woman with the exact same characteristics was offered a 100/300/50 policy (described as representing the "Lowest Limits" available to her) for \$308.08 over six months. (*See* Exhibit R). This is a 44 percent difference in price. While CFC recognizes that gender in itself is an approved rating factor, GEICO is discriminating based on sex when it determines to which "good drivers" it will offer a true "Lowest Limits" policy.⁷
- 43. Solely because of their sex, visitors to GEICO's website have been wrongfully and unlawfully offered a "Lowest Limits" policy with coverage limits that do not comply with California law, compared to similarly situated men, when all other characteristics and risk factors are held constant. In doing so, GEICO denied equal services to persons based on their sex during the period of discrimination.
 - k. Violation of Insurance Code § 780(a); GEICO Misrepresents the Availability of Less Expensive Auto Insurance Policies.
- 44. Insurers "shall not cause or permit to be issued, circulated or used, any statement that is known, or should have been known, to be a misrepresentation of ... [t]he terms of a policy issued by the insurer...." CFC, at the requested hearing, will present evidence that GEICO misrepresents the parameters of the offer with its statement that the 100/300/50 policy coverage limits are the "Lowest Limits" available, when in fact, as "good drivers," this class of customer is entitled to a substantially lower limits, and lower priced, policy. GEICO does this in the case

⁷ We note here the caveat, discussed in subsection (b) above, that even this true "Lowest Limits" policy is only accurate with respect to bodily injury liability coverage.

of prospective customers who are single, working class, lacking in prior automobile insurance coverage, and have not completed a four-year bachelor's degree. This misrepresentation is not made to prospective customers who are married, highly educated, engaged in traditionally white-collar jobs, or currently insured except insofar as liability property damage coverage limits are presented as discussed in subsection (b), *supra*.

- 45. By misrepresenting the availability of the insurance that a customer, by law, would be able to purchase, GEICO distorts the customer's ability to frame and evaluate the offer that the company has extended. By mischaracterizing the customer's offer as the "Lowest Limits" available, GEICO is misstating the insurance product's terms vis-à-vis its other policies and state law, as well as misstating the nature of the greater insurance market, all in contravention of Insurance Code section 780(a) and public policy.
 - Violation of Insurance Code § 790.02 and 790.03; GEICO Misrepresents the Coverage Limits it Offers as the "Lowest Limits."
- 46. California law considers "[m]aking, issuing, circulating... any estimate, illustration, circular, or statement misrepresenting the terms of any policy... to be issued" as an "unfair and deceptive act or practice." Cal. Ins. Code §§ 790.02, 790.03. GEICO has misrepresented, and continues to misrepresent as the "Lowest Limits" available to them, the terms of the auto insurance policies offered to previously uninsured working class, unmarried customers. (See Exhibit S). CFC, at the requested hearing, will present evidence showing the myriad scenarios CFC tested involving customers who are entitled to a state mandated 15/30/5 minimum limits policy, and to the 15/30/25 policies GEICO offers as a default to most drivers, but are instead steered toward the 100/300 "lowest limits" policies the insurer offers.
- 47. While a prospective customer can manipulate the website by altering the coverage requested, this is counterintuitive for the customer for whom the most prominent message is that they have already been quoted the lowest price and for whom the fine print details provided by means of an asterisk further enforce the understanding that the 100/300 limits are the lowest available from the company. By presenting the targeted customers with a web page indicating that the lowest limits available are a 100/300/50 policy, GEICO illegally steers these good

drivers away from the company as a result of the high cost of coverage, or towards a purchase that is substantially more expensive than the coverage the consumer than would likely purchase had they not been misled.

48. Moreover, as further evidence that this practice aims to illegally steer certain customers away from insurance coverage provided by GEICO and from a minimum limits policy to which they have a statutory right, the presentation of the premium quote to these targeted individuals is as a six month total price, whereas those customers not targeted by the unfair and deceptive practice are offered a lower limits quote that is presented as a monthly price. In short, because of the combination of the higher-than-appropriate limits and the six-month premium, the dollar amount highlighted in GEICO's web quote offer under the banner "Lowest Limits" is as much as 900 percent higher than the dollar amount presented to non-victimized customers. (*See* Exhibit T). One possible result of this disparate treatment in the presentation of the six month quote is to create sticker shock that drives the targeted consumer away from GEICO.

II. TESTING METHODOLOGY

49. CFC developed a methodology for testing the impact of various factors on the offer that GEICO provides customers using the company's online insurance quote tool at http://www.geico.com. GEICO's premium quote tool asks a prospective customer to supply information such as address, gender, date of birth, marital status, history of prior insurance coverage, level of education, occupation, miles driven, type of car driven, and accident history. CFC constructed a baseline customer profile for a person who qualifies for a Good Driver Discount policy pursuant to Insurance Code Sections 1861.02 and 1861.025 and, thereby, qualifies for the offer of minimum limits liability coverage pursuant to Insurance Code Section 1861.15. CFC then used that baseline profile to supply information to GEICO through its internet website in order to receive an offer from the company. CFC staff, under the supervision of CFC's consulting expert Douglas Heller, conducted price quote tests at Geico.com during which CFC staff and Mr. Heller changed elements of the consumer's profile by providing different responses to GEICO's questions or information requests related to the following characteristics:

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status, occupation, education, and prior insurance coverage history.

address (CFC tested addresses in ten ZIP Codes around the state), gender, birthdate, marital

- 50. Each customer profile was tested by changing only one element of customer information at a time in order to establish the "but for" underwriting and rating factors used in GEICO's online premium quote tool. CFC kept the number of miles driven to work, vehicle type, vehicle mileage and driving record the same throughout. For example, in one test a female customer's profile was tested against a male customer's profile. The tested profiles would each share the same date of birth, 8 occupation, marital status, clean driving record, years licensed, type of vehicle, vehicle miles, education, and lack of prior insurance, diverging only with regard to gender. CFC then found that, from at least September 19th, 2014, until October 24th, 2014 (the exact duration to be ascertained through discovery), based on a customer's gender, GEICO would offer the female customer higher coverage limits, and consequently a higher price quote, than was offered to the male customer. More recent tests suggest that GEICO is not currently using sex as a means of determining which customers are misled, but the company is currently discriminating against customers of both sexes based on level of education attainment.
- 51. CFC tested approximately 90 different profiles in a similar manner. For each customer profile, screenshots were taken of each webpage viewed during the premium quote process. In addition, a video screen capture and demonstration of one of CFC's tests has been recorded and will be offered as evidence at the requested hearing.

III. PROPOSED REMEDIES

52. Pursuant to Insurance Code section 1858.07, any person who uses any rating system in violation of Chapter 9 of the Insurance Code "is liable to the state for a civil penalty not to exceed five thousand dollars (\$5,000) for each act, or, if the act or practice was willful, a

⁸ In some instances, the tested customer profile date of birth varied by several days, but not to the extent that would impact the customer profile's years of driving experience.

civil penalty not to exceed ten thousand dollars (\$10,000) for each act." Section 1858.07 gives the Commissioner the discretion to determine what constitutes an act.

- 53. Additionally, Insurance Code section 790.035 makes any person who engages in any "unfair or deceptive act or practice defined in Section 790.03... liable to the state for a civil penalty to be fixed by the commissioner, not to exceed five thousand dollars (\$5,000) for each act, or, if the act or practice was willful, a civil penalty not to exceed ten thousand dollars (\$10,000) for each act." Section 790.03 gives the Commissioner the discretion to establish what constitutes an act.
- 54. CFC expects to elicit in discovery the precise number of current and former customers to whom the alleged discriminatory treatment has been applied, as well as how many potential customers may have been dissuaded from purchasing automobile insurance from the company because of GEICO's discriminatory practices. Furthermore, based on the consistent and precise pattern of GEICO's website programming targeting prospective customers with the characteristics discussed above, upon information and belief, CFC considers an inference of willful conduct to be supported.
- 55. In the requested proceeding, CFC will urge the Commissioner to separately consider: 1) each quote of higher coverage limits and 2) each instance an impermissible rating factor was used, as separate acts, each of which is deserving of the highest civil penalty allowed by sections 1858.07 and 790.035.
- 56. Furthermore, pursuant to Insurance Code section 1858.3(a), CFC requests that the Commissioner enjoin GEICO from the practices alleged herein and revoke GEICO's certificate of authority to operate in California pursuant to Insurance Code section 1861.14, which empowers the Commissioner to "suspend or revoke, in whole or in part, the certificate of authority of any insurer which fails to comply with the provisions of [Chapter 9, Article 10 of the Insurance Code]", *ergo* sections 1861.15(a), 1861.02(a)(1-4), 1861.05(a) and 1861.02(c). Given the nature of the discrimination, the apparent pervasiveness and consistency of GEICO's practices, as well as the significant degree to which the company relies on online insurance

quotes as part of its business model, CFC believes that a revocation of GEICO's certificate of authority is justified.

IV. PETITIONER

- 57. The petitioner, Consumer Federation of California, is a non-profit 501(c)(4) federation of individual consumer members and several organizational members that are comprised of California consumers, including consumer groups, senior citizen, labor and other organizations. CFC's primary business address is 1107 9th St. Suite 625, Sacramento, CA 95814 and the phone number is 916-498-9608. On May 1, 2014, CFC was deemed eligible to seek compensation in Department of Insurance proceedings pursuant to Insurance Code section 1861.10 by order of Insurance Commissioner Dave Jones. The finding of eligibility is effective for two years. Since 2013, CFC has intervened in at least six rate application proceedings before the Department of Insurance.
- 58. CFC and its predecessor, the Association of California Consumers, has been advocating for consumers in California for more than 50 years and is an affiliate of the Consumer Federation of America. As set forth in its Articles of Incorporation, CFC's purpose is:

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

59.

Sacramento and San Francisco to continuously monitor legislative, regulatory and other public issues affecting consumers in order to effectively represent consumers and promote or oppose policies and decisions that affect them. Recognized for its role as a leading consumer organization in California, CFC's Executive Director Richard Holober served on both the Consumer Advisory Board and Task Force on Insurance Fraud established by former Insurance Commissioner Poizner. In addition, Consumer Federation of California Board President Jim Gordon has served on the California Automobile Assigned Risk Plan Advisory Board as an appointee of the Insurance Commissioner to represent consumers since 2005. CFC has also engaged Douglas Heller, a nationally recognized consumer advocate with expertise in insurance matters, extensive experience representing consumers before the Department of Insurance and extensive experience intervening to challenge California rate and class plan filings pursuant to Proposition 103.

To achieve its consumer advocacy goals, CFC maintains a full-time staff in

V. AUTHORITY FOR PETITION FOR FINDING OF NONCOMPLIANCE, PETITION FOR ORDER TO SHOW CAUSE, AND GRANTING REQUEST FOR A HEARING

- 60. The authority for this Petition for Finding of Noncompliance is found in Insurance Code section 1858(a), which grants "any person" the right to "file a written complaint with the commissioner requesting that the commissioner review the manner in which the rate, plan, system, or rule has been applied with respect to the insurance afforded to that person." Any person doing so may "file a written request for a public hearing before the commissioner...." Cal. Ins. Code § 1858(a).
- 61. Courts have held that "Proposition 103 enhanced the preexisting administrative procedures by extending standing from '[a]ny person aggrieved' (§ 1858, subd. (a)) to '[a]ny person' [as found in Ins. Code, § 1861.10(a)]..." *Farmers Ins. Exchange v. Superior Court*, 137 Cal. App. 4th 842, 853 (Cal. App. 2d Dist. 2006). The court in *Farmers* went on to elaborate that the "[u]se of the language '[a]ny person' confers standing on persons who are not real parties in interest notwithstanding the general requirement that an action be prosecuted by the CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND

CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION - 23

real party in interest [pursuant to Code Civ. Proc. § 367]..." (*Farmers Ins. Exchange*, 137 Cal. App. 4th 842, 853, fn. 8) and that "[Insurance Code] chapter 9 authorizes, and therefore 'establish[es]' within the meaning of the first clause of section 1861.01, subdivision (a), an administrative proceeding to challenge a rate charged, rating plan, rating system, or underwriting rule..." pursuant to Insurance Code § 1858(a). *Farmers Ins. Exchange*, 137 Cal. App. 4th at 854. Accordingly, CFC is authorized to request a hearing pursuant to Insurance Code section 1858(a).

- 62. The authority for CFC's Petition for an Order to Show Cause is Insurance Code section 790.05, which empowers the commissioner to issue and serve an order to show cause when he has "reason to believe that a person has been engaged... in... any unfair or deceptive act or practice defined in Section 790.03" and such a proceeding "would be to the interest of the public...." As discussed in Section I (i), GEICO is engaged in a practice of misrepresenting the terms of the auto insurance policies it offers to previously uninsured working class, lesseducated, unmarried Californians in violation of Insurance Code section 790.03, as well as 790.02. Given GEICO's large California auto insurance market share and customer base, as well as the pervasiveness of the unlawfully discriminatory and deceptive conduct alleged, a hearing and order to show cause is in the public interest.
- 63. Finally, in addition to the authority discussed above, CFC's Petition for Hearing is permitted pursuant to Insurance Code section 1861.10(a) which authorizes "[a]ny person..." to "initiate... any proceeding permitted or established pursuant to [Chapter 9]..." and to "enforce any provision" of Proposition 103. As discussed above, CFC seeks to enforce Insurance Code sections 1861.02(a), 1861.02(c), 1861.03(a), 1861.05(a), and 1861.15(a). A hearing is further permitted by regulation, which authorizes "[a]ny person, whether as an individual, representative of an organization, or on behalf of the general public, [to] request a hearing...." 10 CCR § 2653.1. A hearing in this matter is essential and appropriate in order for CFC to submit evidence of GEICO's illegal conduct.

VI. INTEREST OF PETITIONER

- 64. CFC's interest in the above captioned proceeding is to ensure that consumers who desire to purchase automobile insurance policies, as required by California law, from GEICO, are not deceived or misled and are charged rates and offered policies in compliance with California law, specifically with Insurance Code sections 1861.15(a), 1861.03, 1861.05, 1861.02(c), and 1861.02(a), as well as sections 780, 790.02 and 790.03.
- 65. As an organization dedicated to protecting the rights of consumers, CFC is especially concerned with the pricing of products and services, such as auto insurance, that consumers are required to purchase. As noted in Section I (paragraphs 1 through 48), CFC and its experts believe that GEICO is discriminating by not offering qualified good drivers the lowest auto insurance coverage limits, by using customer history of prior insurance coverage, occupation, and level of education as a rating factor, by discriminating on the basis of marital status and, at least for a time, on the basis of sex, and by misleading victims as to the price and availability of coverage.
- 66. CFC seeks this grant of intervention in order to represent the interests of consumers in ensuring compliant insurance practices. CFC asserts that, if granted leave to intervene, it will provide evidence and information that will aid the Department of Insurance in its review of GEICO's practices.

VII. AUTHORITY FOR PETITION TO PARTICIPATE AND INTERVENE

67. CFC's Petition to Participate is allowed by Insurance Code section 1861.10(a), which grants "any person" the right to "intervene in any proceeding permitted or established pursuant to [Chapter 9 of Part 2 of Division 1 of the Insurance Code]... and enforce any provision of this article." CFC has requested a public hearing pursuant to Insurance Code sections 1858(a) and 1861.10, which are both within Chapter 9 of the Insurance Code. The requested proceeding is to enforce Insurance Code sections 1861.02(a), 1861.02(c), 1861.03(a), 1861.05(a), and 1861.15(a), among others, making the proceeding both "permitted" and "established" pursuant to the chapter.

68. The right of CFC to participate is further authorized pursuant to 10 California Code of Regulations sections 2661.3 and 2661.4 *et seq.*, which respectively authorize this petition to intervene and participate. CFC has raised issues directly related to GEICO's compliance with California laws and regulations, and in the course of its participation will present evidence in support of its allegations.

VIII. PARTICIPATION OF CFC

69. CFC will submit evidence as described *supra* and will fully participate in all aspects of the proceeding. In accordance with 10 California Code of Regulations section 2661.3, CFC verifies that it will be able to participate in this proceeding without unreasonably delaying this proceeding or any other proceedings before the Insurance Commissioner.

IX. INTENT TO SEEK COMPENSATION

- 70. Pursuant to Insurance Code section 1861.10 and 10 California Code of Regulations section 2661.3, CFC intends to seek compensation in this proceeding. In the past, the Commissioner has awarded CFC compensation for its advocacy witness fees. The Commissioner issued CFC's most recent Finding of Eligibility on May 1, 2014.
- 71. CFC's estimated budget is attached as Exhibit A. CFC has based this budget on the technical expertise and regulatory experience needed to address the issues of concern in the proceeding; its best estimate of the amount of time needed to participate in and contribute to the proceeding, taking into account both the amount of time that has already been spent by CFC staff and expert consultants and an estimate of time needed to complete the tasks required for a hearing as requested here; as well as the past experience of CFC's consultants in Department of Insurance administrative proceedings. The budget presented in Exhibit A is a preliminary estimate and CFC reserves the right to modify as its expenses become more certain, or in its request for final compensation. CFC will give notice of such modifications as soon as practicable, and will comply with the budget revision requirements in the relevant intervenor regulations.

WHEREFORE, CFC respectfully requests that the Insurance Commissioner GRANT its Petition for Finding of Noncompliance, Petition for Hearing, Petition for Order to Show Cause, Petition to Participate, and Petition to Intervene in the proceeding. DATED: February 12, 2015 Respectfully submitted, Donald Hilla **Aaron Lewis Aaron Lewis** Attorneys for CONSUMER FEDERATION OF **CALIFORNIA**

VERIFICATION OF AARON LEWIS IN SUPPORT OF CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, AND NOTICE OF INTENT TO SEEK COMPENSATION

I, Aaron Lewis, verify:

- 1. I am an attorney for the Consumer Federation of California. If called as a witness, I could and would testify competently to the facts stated in this verification.
- 2. I personally prepared the pleading titled, "Consumer Federation of California's Petition for Finding of Noncompliance and Order to Show Cause, Petition for Hearing, Petition to Participate, and Notice of Intent to Seek Intervenor Compensation" filed in this matter. All of the factual matters alleged therein are true of my own personal knowledge, or I believe them to be true after I conducted some inquiry and investigation.
- 3. Pursuant to California Code of Regulations, title 10, section 2661.3, Consumer Federation of California attaches as Exhibit A its estimated budget in this proceeding.

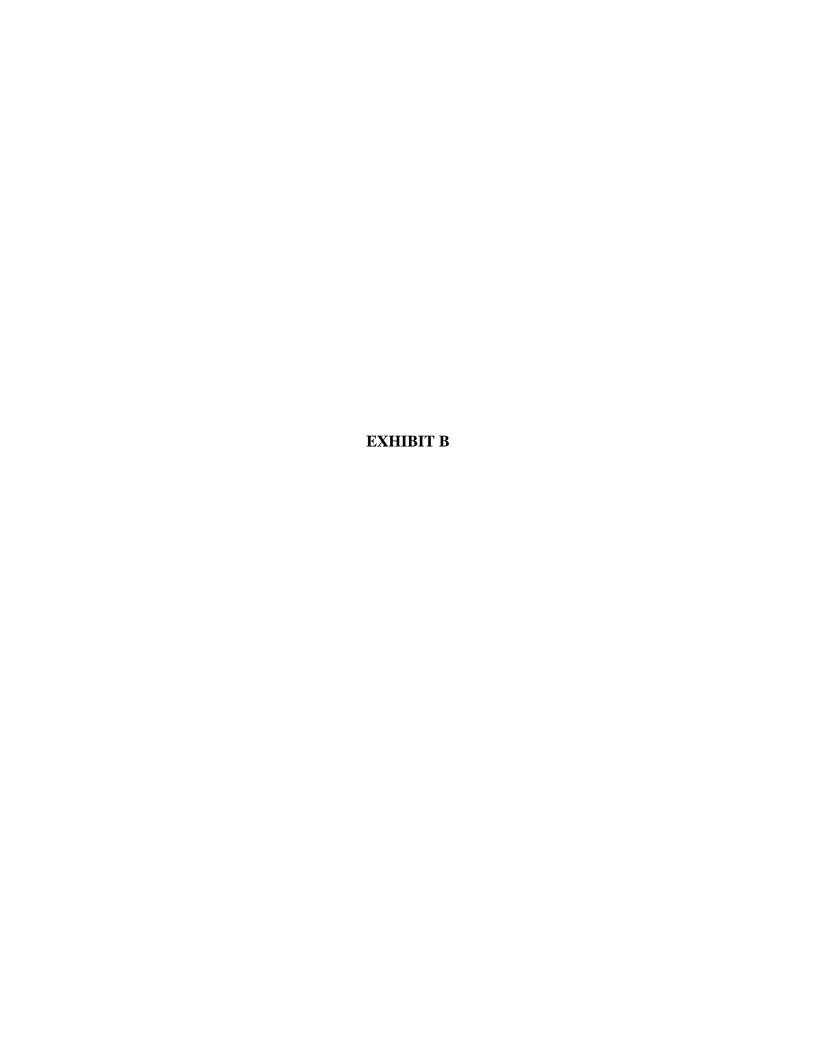
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed February 12, 2015, at Sacramento, California.

Aaron Lewis

	EXHIBIT A	
	PRELIMINARY BUDGET	
<u>ITEMS</u>	ESTIMAT	ED COST
1. <u>A</u>	attorneys	
Donald P	Research applicable laws and regulations; Draft and edit petition for hearing and petition to participate; Confer with Consumer Federation of California (CFC) counsel and outside experts regarding legal and evidentiary issues; Confer with CFC regarding strategic decisions related to the petition, hearing and the resolution of the matter; Participate in discussions with CDI's and Respondent's counsel and staff; and Brief issues; assist in conducting discovery; prepare for evidentiary hearing; participate in evidentiary hearing.	\$52,500
Aaron Le	conduct research into rating and underwriting practices of GEICO; Research applicable laws and regulations; Draft and edit petition for hearing and petition to participate; Confer with Consumer Federation of California (CFC) counsel and outside experts regarding legal and evidentiary issues; Confer with CFC regarding strategic decisions related to the petition, hearing and the resolution of the matter; Participate in discussions with CDI's and Respondent's counsel and staff; Brief issues; assist in conducting discovery; prepare for evidentiary hearing; participate in evidentiary hearing; prepare post-hearing briefing; and Prepare request for compensation.	\$78,750
2. <u>A</u>	dvocates	
Richard F	Holober @ \$250 per hour, 50 hours	\$12,500
Douglas I	Heller @ \$295 per hour, 250 hours	\$73,750
ORDER	IER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLI TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PET ITERVENE. AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION	TTION TO

1 2	 Confer with Consumer Federation of California (CFC) counsel and outside experts regarding legal and evidentiary issues; Confer with CFC regarding strategic decisions related to the petition, hearing and the 	
	resolution of the matter;	
3	 Participate in discussions with CDI's and Applicant's counsel and staff; Brief issues; assist in conducting discovery; prepare for evidentiary hearing; 	
5	participate in evidentiary hearing; prepare post-hearing briefing; and • Prepare request for compensation.	
6	Megan Varvais @ \$125 per hour, 10 hours • Conduct online tests of rating and underwriting practices of GEICO.	\$1,250
7 8	Brian Taylor @ \$125 per hour, 5 hours • Conduct online tests of rating and underwriting practices of GEICO.	\$625
9	3. <u>Expert Witnesses</u>	
10	Internet Marketing Expert @ \$500 per hour, 30 hours	\$15,000
11	 Provide expert testimony regarding web-based marketing, including the effect of visual hierarchies, emotional triggers and color psychology. 	
12	4. Expenses	
13	Travel (airfare, ground transportation, hotel, meals, etc)	\$4,000
14	Other Expenses (postage/delivery, photocopies, transcripts, facsimiles, telephone	
15	calls, etc.)	\$2,000
16		Ψ2,000
17	Total Estimated Budget	\$240,375
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INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR COMPENSATION - $30\,$





Customer Vehicles Discounts Quote Drivers Talk to an Agent **Customer Information** 1-800-861-8380 Associated with the We need to ask you for some personal information to provide you with an accurate quote. This Military? Call us at: information is kept private and secure, and will not be sold. 1-800-720-2198 Jennifer First name What if I am in the process of moving? Smithers Last name What if my address is FPO? 3102 W 83rd St Address Apt Am I eligible for a multi-policy discount for homeowners, renters or condominium insurance? ZIP Code 90305 What is considered "unmarried"? City, State Inglewood, CA 08 / 09 / 1984 Date of birth Select 'Yes' if ANY of the following apply to you: > I need to insure more than one driver O Yes No > I need to insure more than one vehicle > I am married

Questions or problems? Click here or call us anytime at 1-800-861-8380.

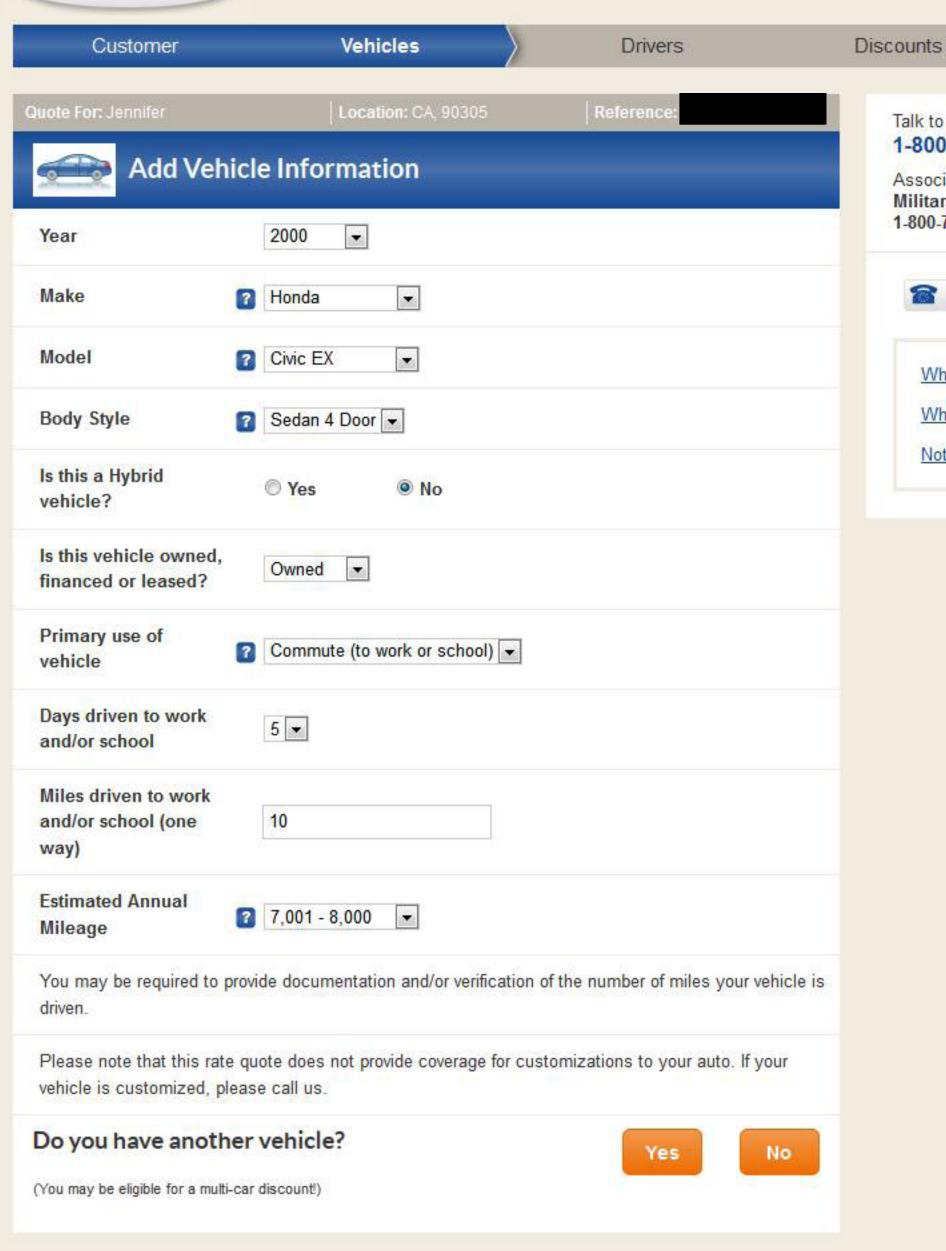
Privacy Policy | Security Policy | Terms and Conditions of Use



Continue







Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198



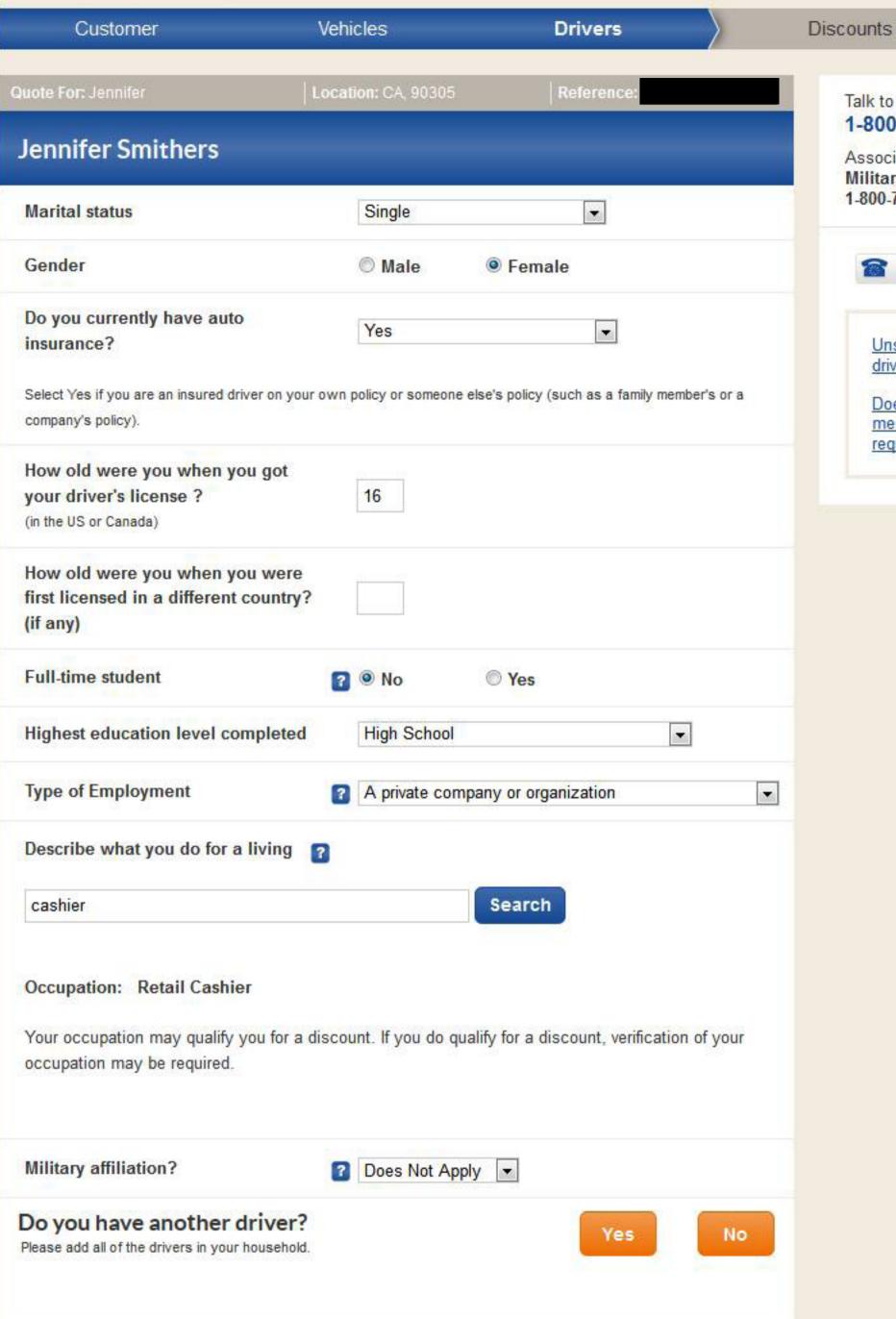
Quote

What if I have more than 9 vehicles?
What if I have customizations?
Not sure you have a Hybrid Vehicle?









Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198

Click for Call

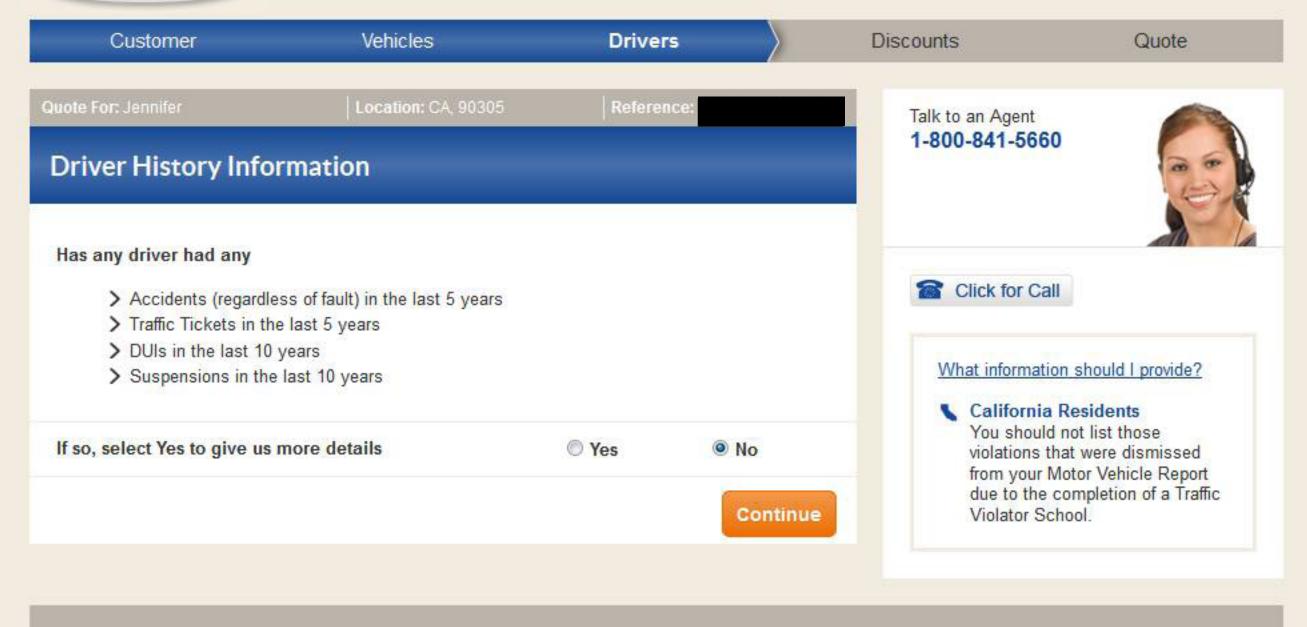
Unsure who you should list as a driver?

Does my driving experience overseas meet GEICO's driving experience requirements?









Save & Resume Later

Questions or problems? Click here or call us anytime at 1-800-841-5660.

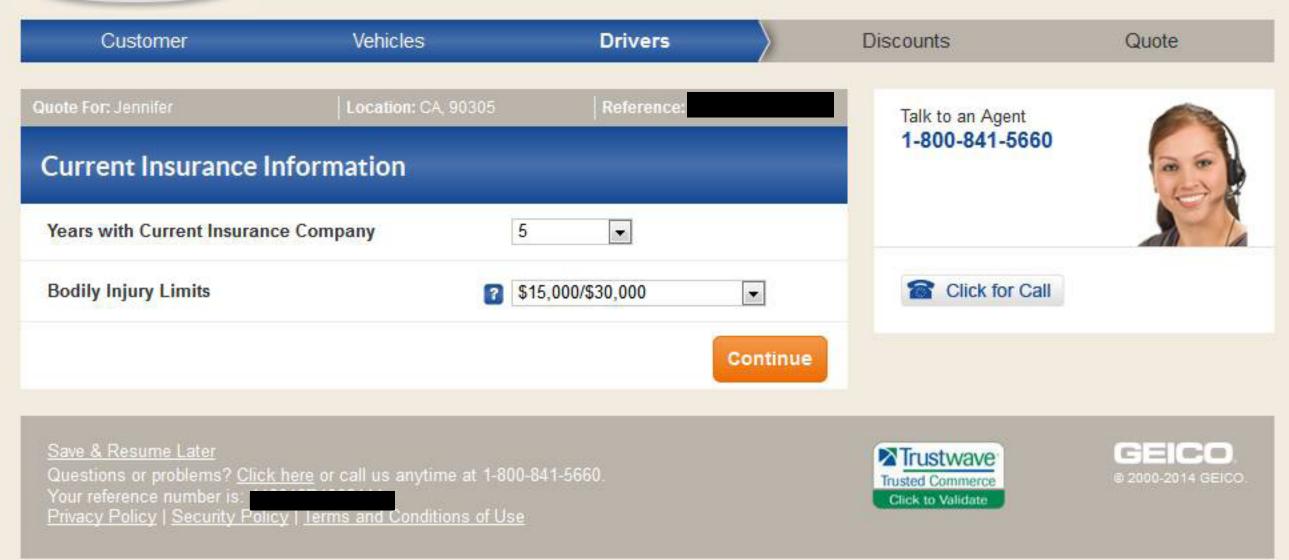
Your reference number is:

Privacy Policy | Security Policy | Terms and Conditions of Use



GEICO 8 2000-2014 GEICO.





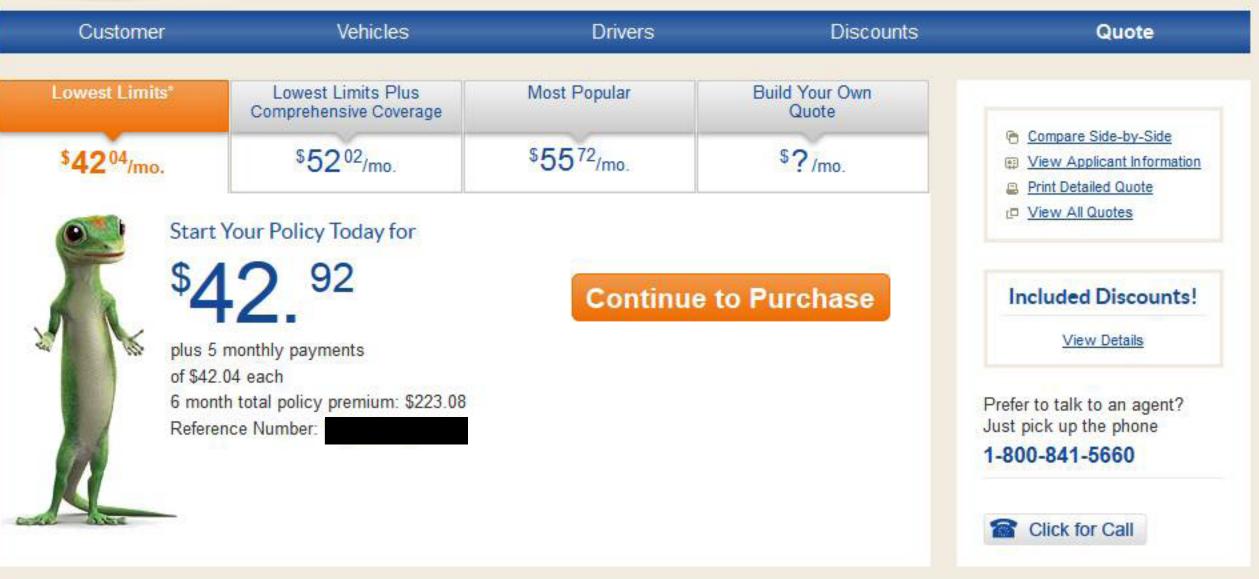


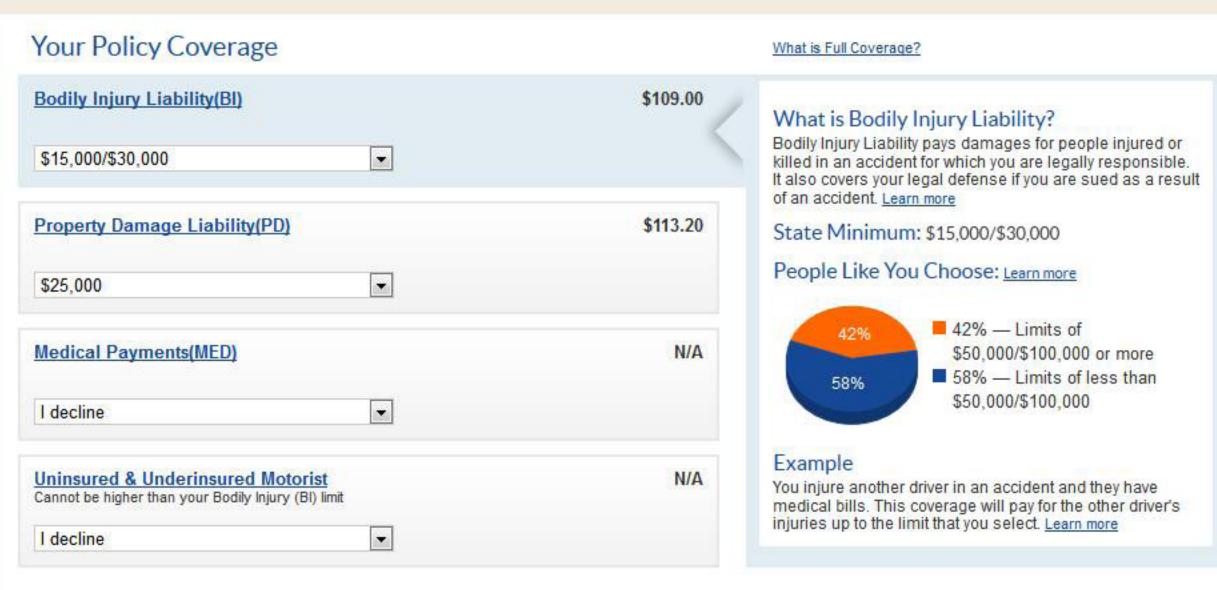
Vehicles Discounts Quote Customer Drivers Quote For: Jennifer Location: CA. 90305 Reference Talk to an Agent 1-800-841-5660 Discounts Answer the questions below to let us quote the lowest rate. Do you belong to any of these types of groups? Check all that apply: Click for Call Alumni Associations, Colleges and Universities Did you know GEICO could help you with motorcycle, homeowners, and renters insurance? When you carry more than one type of policy you may qualify for a multi-policy discount. Berkshire Hathaway Affiliates **Business and Professional Organizations Credit Unions** Fraternities, Sororities, and Honor Societies Organizations for Members of the Military Organizations for Education Other (RCI Timeshare owners, National Geographic subscribers, ACTIVE Network) Now, select your group from the list below: Not a member of any of these organizations Save Your Quote... Provide an email address to return to your quote. **Email Address** This email address will be used to send you emails about your quote. We respect customer privacy and do not sell email addresses. Contact number Go Paperless Paperless Bills via email: No thanks, maybe later Yes! No thanks, maybe later Paperless Policy online: Yes! By selecting "Yes" you are accepting our Terms & Conditions. One click away from your quote! Continue

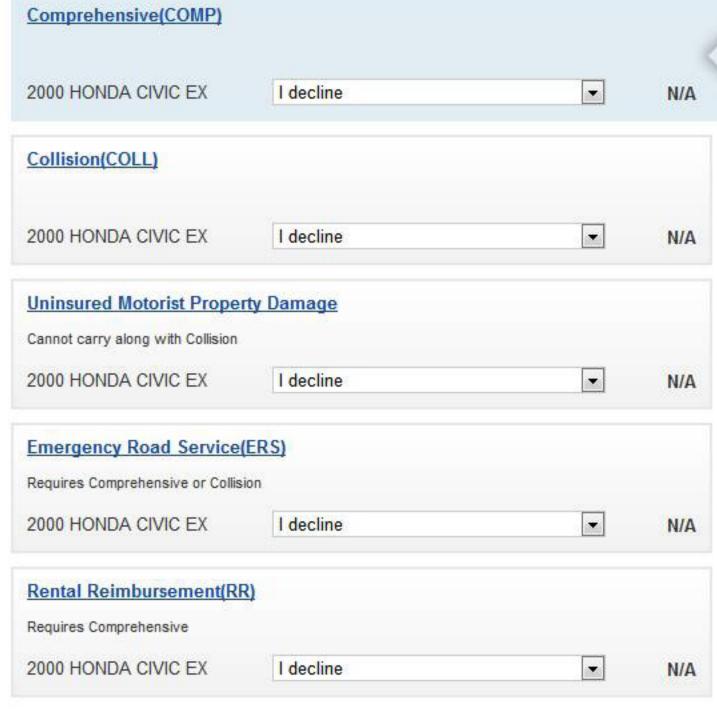




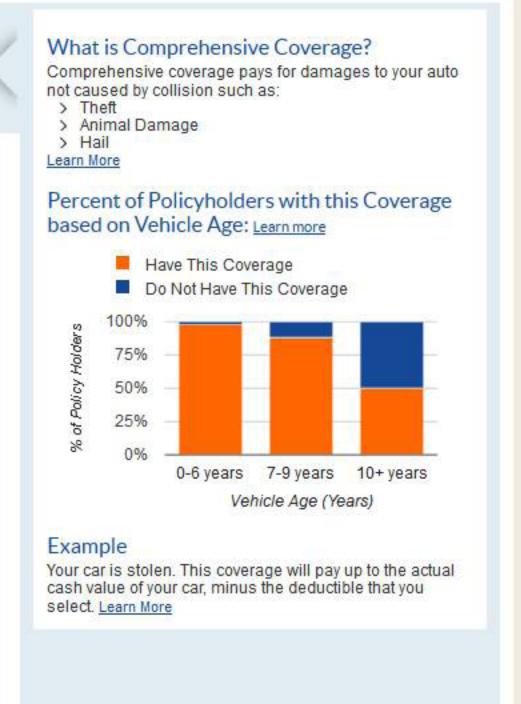








What is Full Coverage?



It's easy to buy this quote online!
You can also call 1-800-841-5660 or visit a local office.

Continue to Purchase

*Important Messages

We rely on your accurate statements when we provide you with a quote. However, we will verify your information through motor vehicle and claims reports if you decide to purchase a policy from GEICO General Insurance Company.

*Assumptions were used in your quote.

Need to make changes to these assumptions? One of our professional agents will be happy to assist you.

1) You have not had a theft or vandalism.

Please note that this rate quote does not provide coverage for customizations to your auto. If your vehicle is customized, please call us.

GEICO reserves the right to not insure vehicles that were totaled, reconstructed, or significantly damaged due to natural disasters (flood, fire, hail).

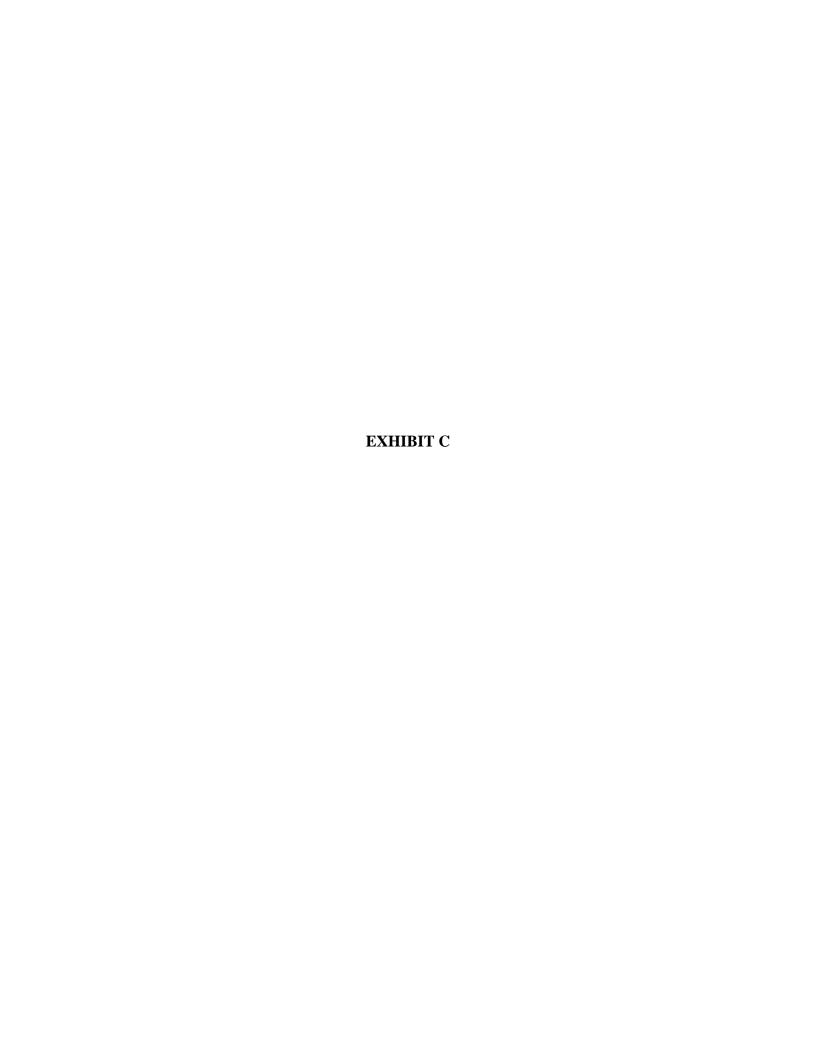
If you pay your premium in installments, each payment includes an installment fee.

The "Similar Coverage" package quote is based solely on your current bodily injury coverage limits. It may not match your other current coverages, nor your current deductibles. The "Lowest Limits" package quote includes the lowest bodily injury limits that we offer in your state, but may not represent the lowest limits available for other coverages, nor the lowest possible deductibles.

Additional limits may be available. If you need a quote for a limit not shown, please call us.

Collision deductibles that include the Uninsured Motorist deductible waiver are more expensive than the Collision deductibles that do not include the waiver.







Quote Discounts Drivers Vehicles Customer

Customer Information

We need to ask you for some personal information to provide you with an accurate quote. This information is kept <u>private</u> and <u>secure</u>, and will not be sold.

Marge	Holloway	7 3102 W 83rd St Apt	90305	Inglewood, CA
First name	Last name	Address	ZIP Code	City, State

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What if I am in the process of moving?

What if my address is FPO?

Am I eligible for a multi-policy discount for homeowners, renters or condominium insurance?

What is considered "unmarried"?

Continue

o No

○ Yes

08 / 08 / 1984

Date of birth

Select 'Yes' if ANY of the following apply to you:

> I need to insure more than one driver > I need to insure more than one vehicle

> I am married

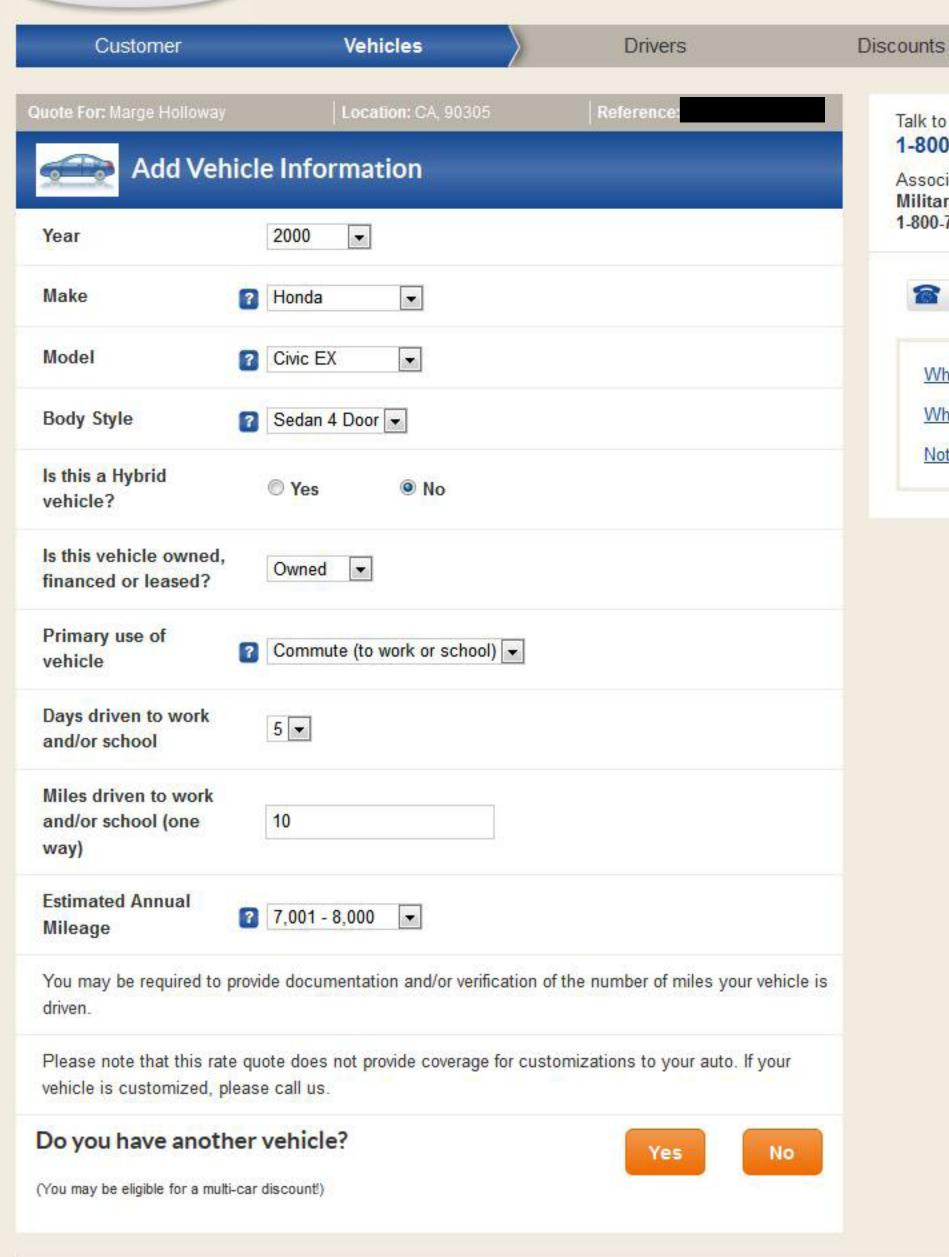
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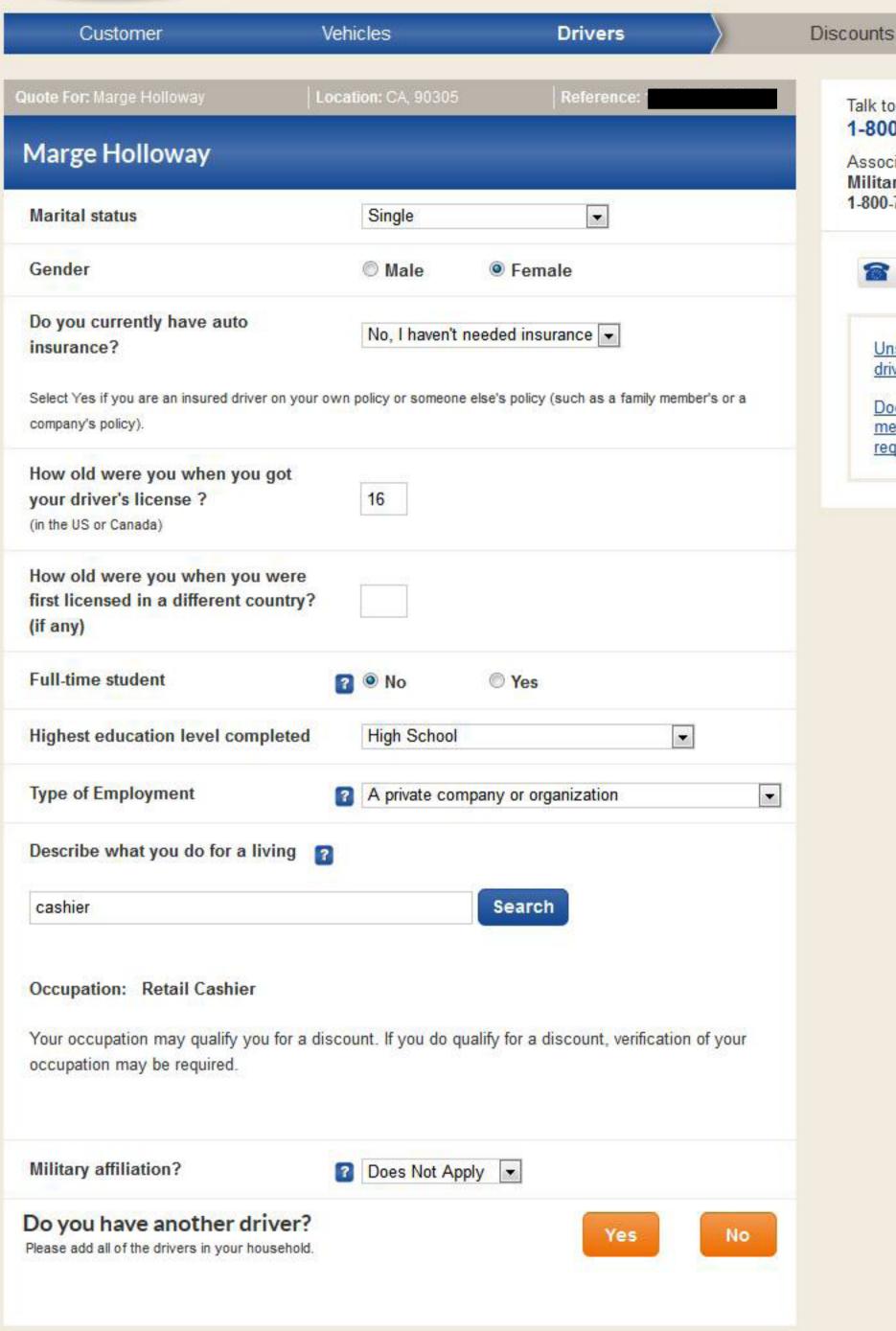
What if I have more than 9 vehicles?
What if I have customizations?

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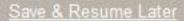




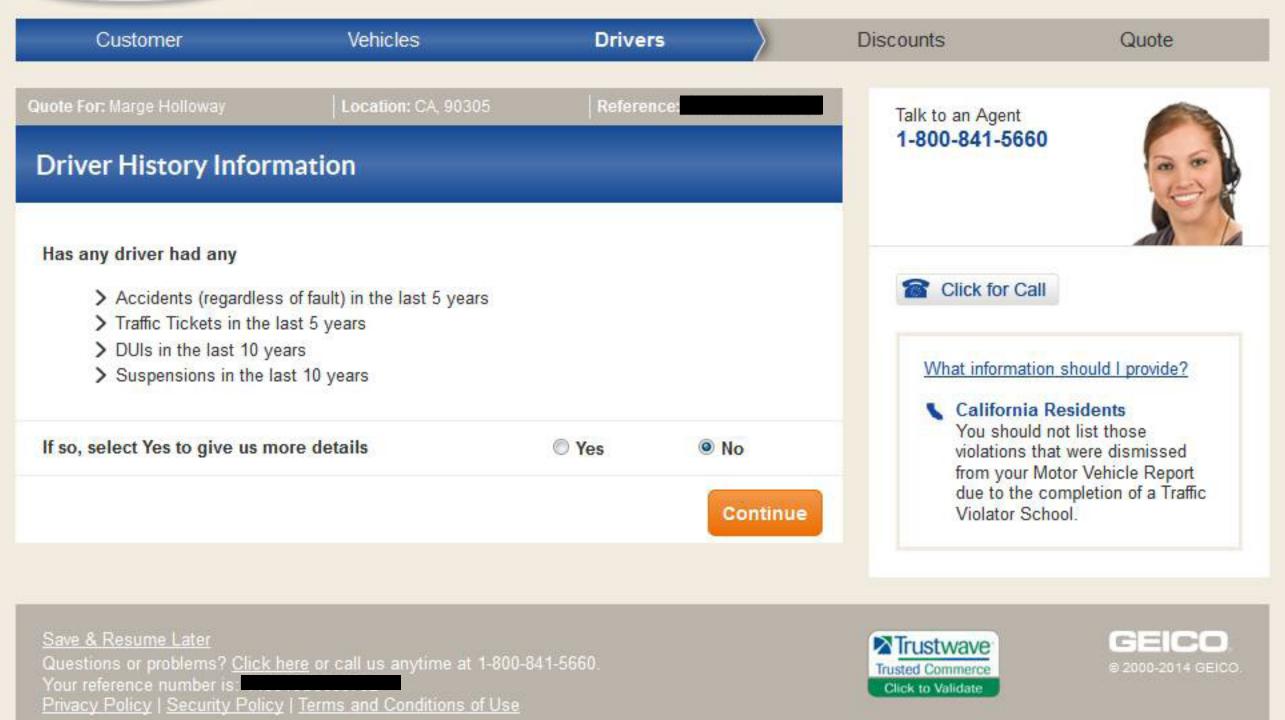
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Unsure who you should list as a driver?

Does my driving experience overseas meet GEICO's driving experience requirements?







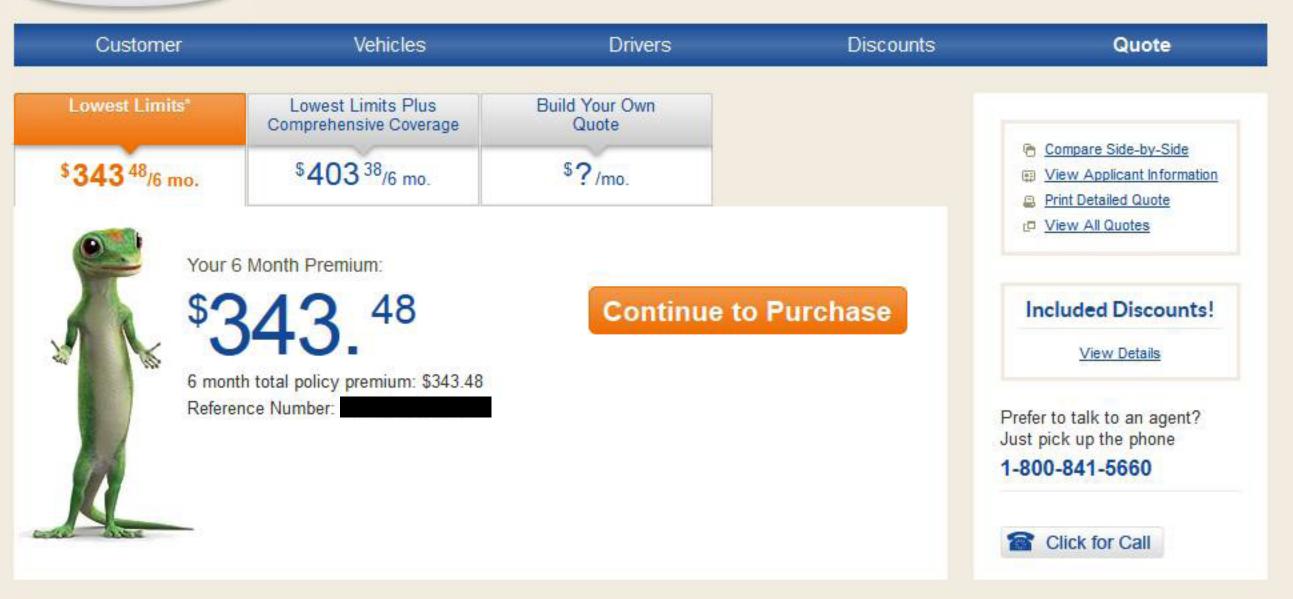


Customer Vehicles Discounts Quote Drivers Quote For: Marge Holloway Reference: Talk to an Agent 1-800-841-5660 Discounts Answer the questions below to let us quote the lowest rate. Do you belong to any of these types of groups? Check all that apply: Click for Call Alumni Associations, Colleges and Universities Did you know GEICO could help you with motorcycle, homeowners, and renters insurance? When you carry more than one type of policy you may qualify for a multi-policy discount. Berkshire Hathaway Affiliates **Business and Professional Organizations Credit Unions** Fraternities, Sororities, and Honor Societies Organizations for Members of the Military Organizations for Education Other (RCI Timeshare owners, National Geographic subscribers, ACTIVE Network) Now, select your group from the list below: Not a member of any of these organizations Save Your Quote... Provide an email address to return to your quote. **Email Address** This email address will be used to send you emails about your quote. We respect customer privacy and do not sell email addresses. Contact number Go Paperless Paperless Bills via email: No thanks, maybe later Yes! No thanks, maybe later Paperless Policy online: Yes! By selecting "Yes" you are accepting our Terms & Conditions. One click away from your quote! Continue

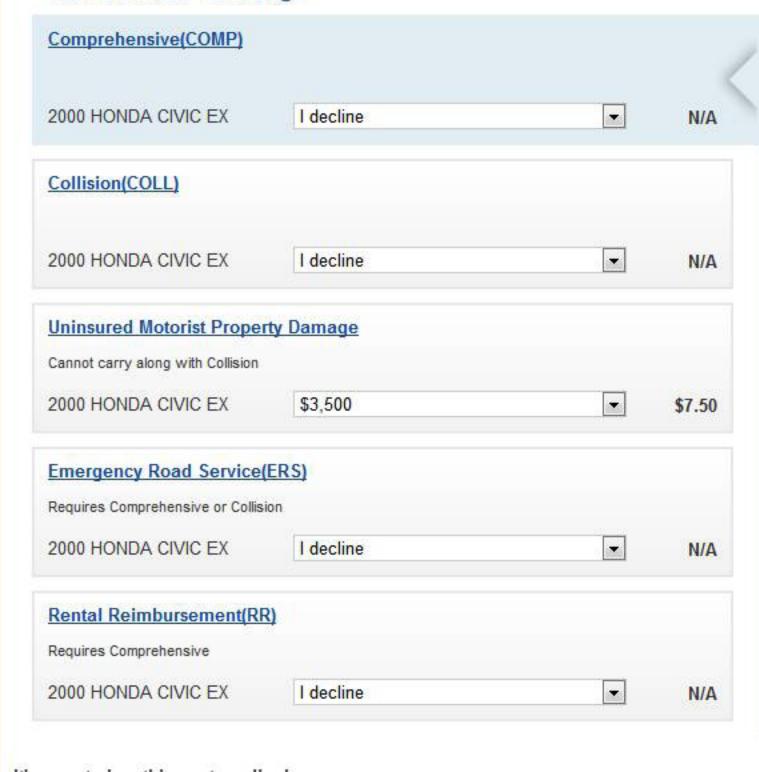




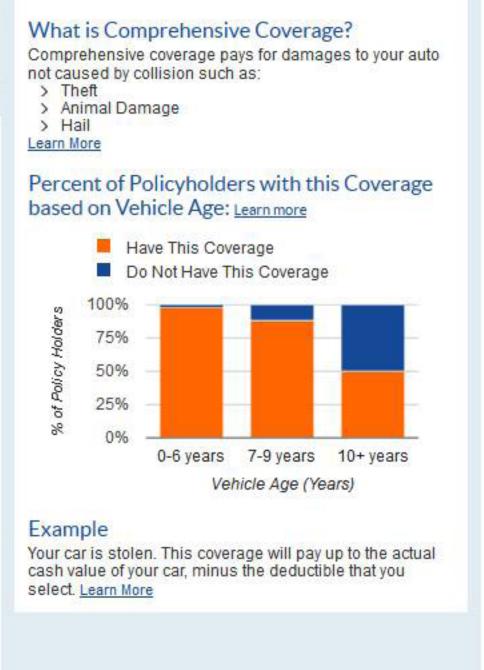








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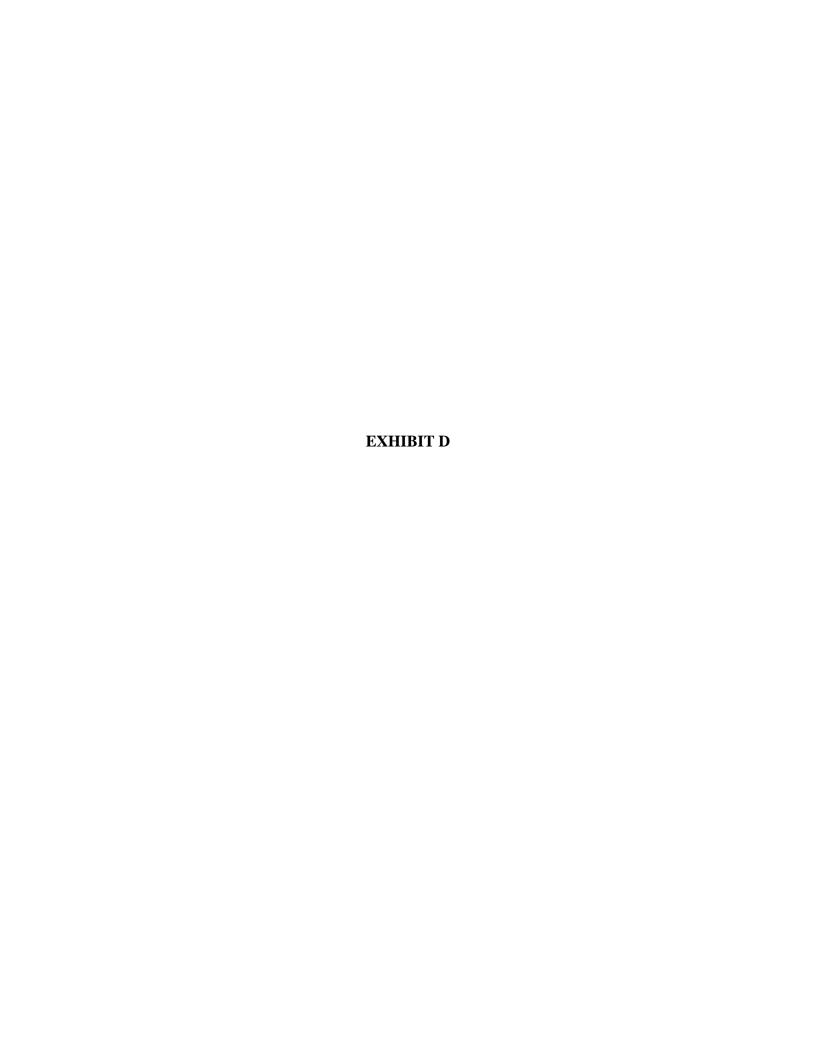
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ı

Continue

o No

○ Yes

/ 1984

Date of birth

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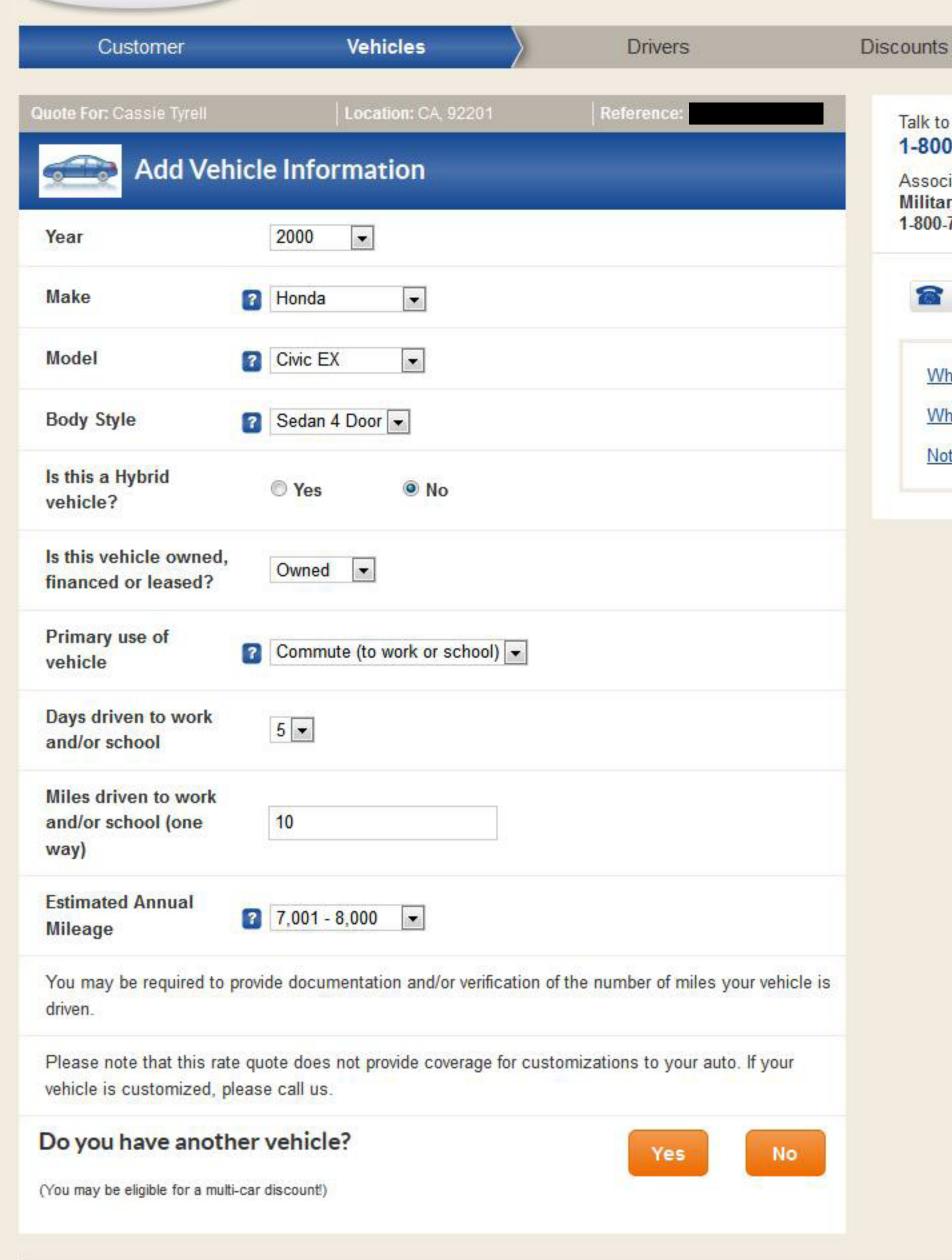
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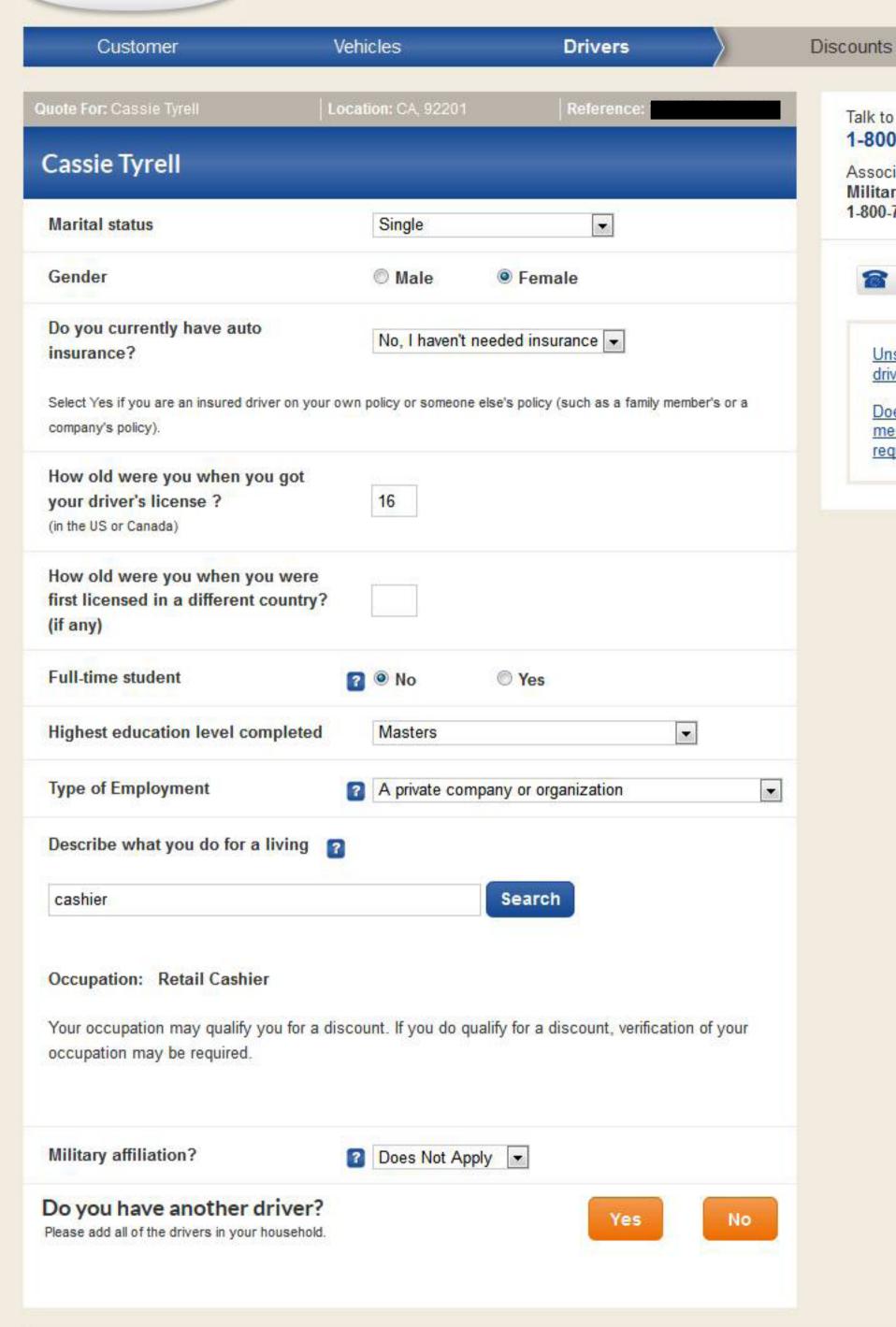
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driver?



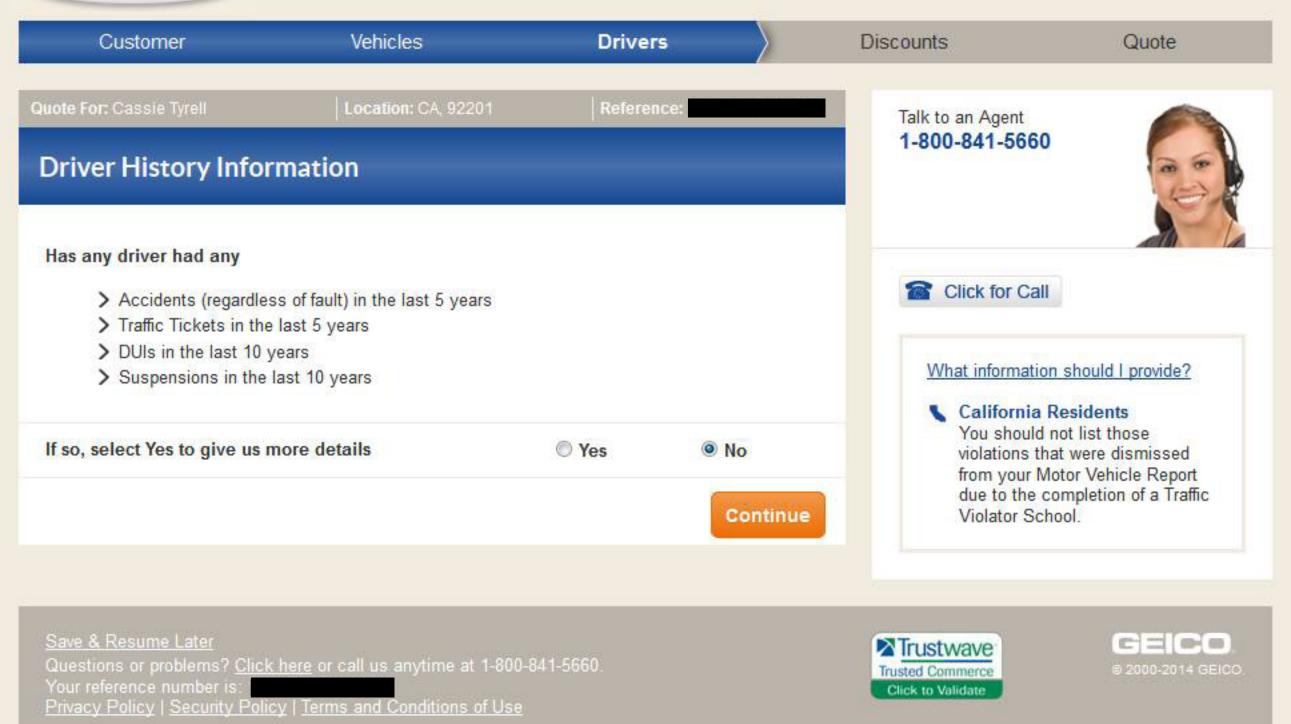
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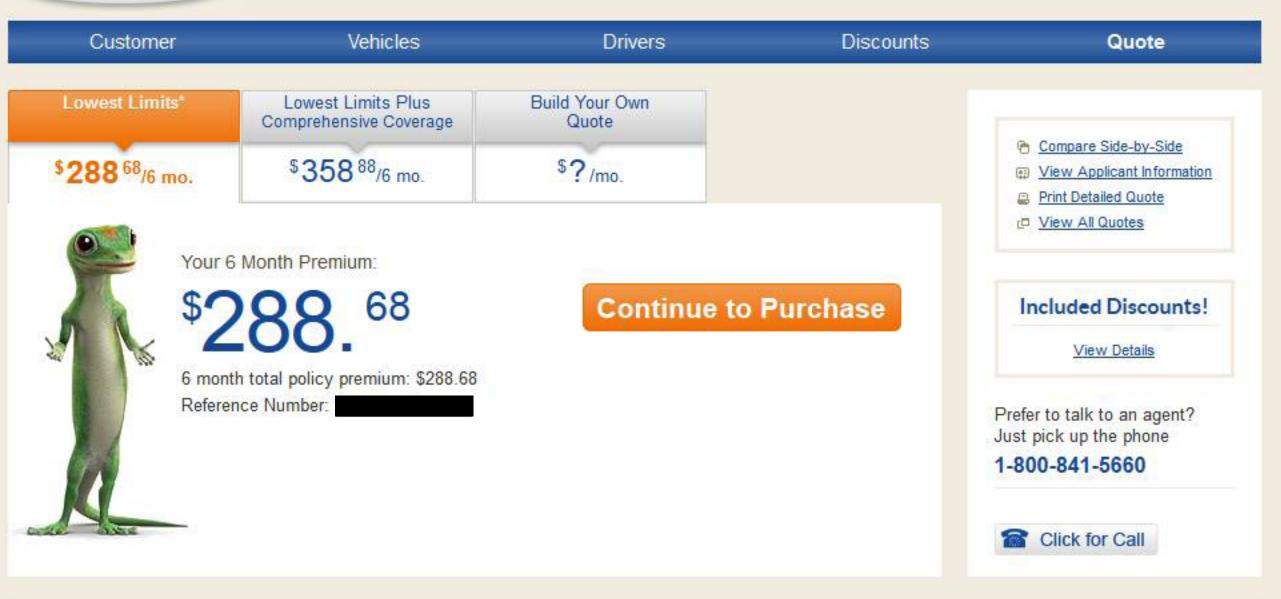


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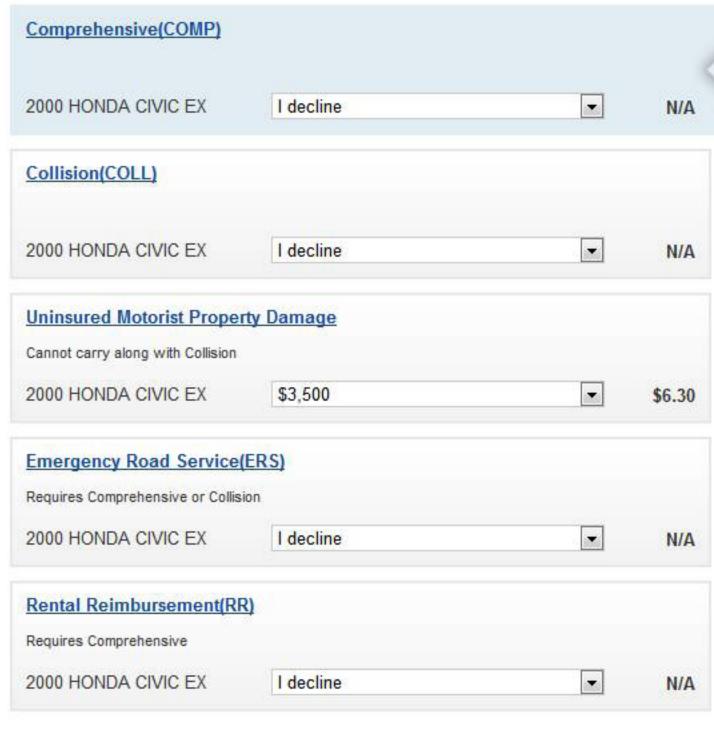




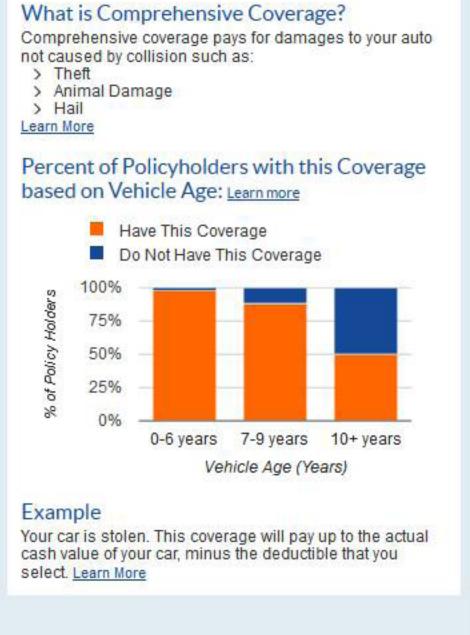








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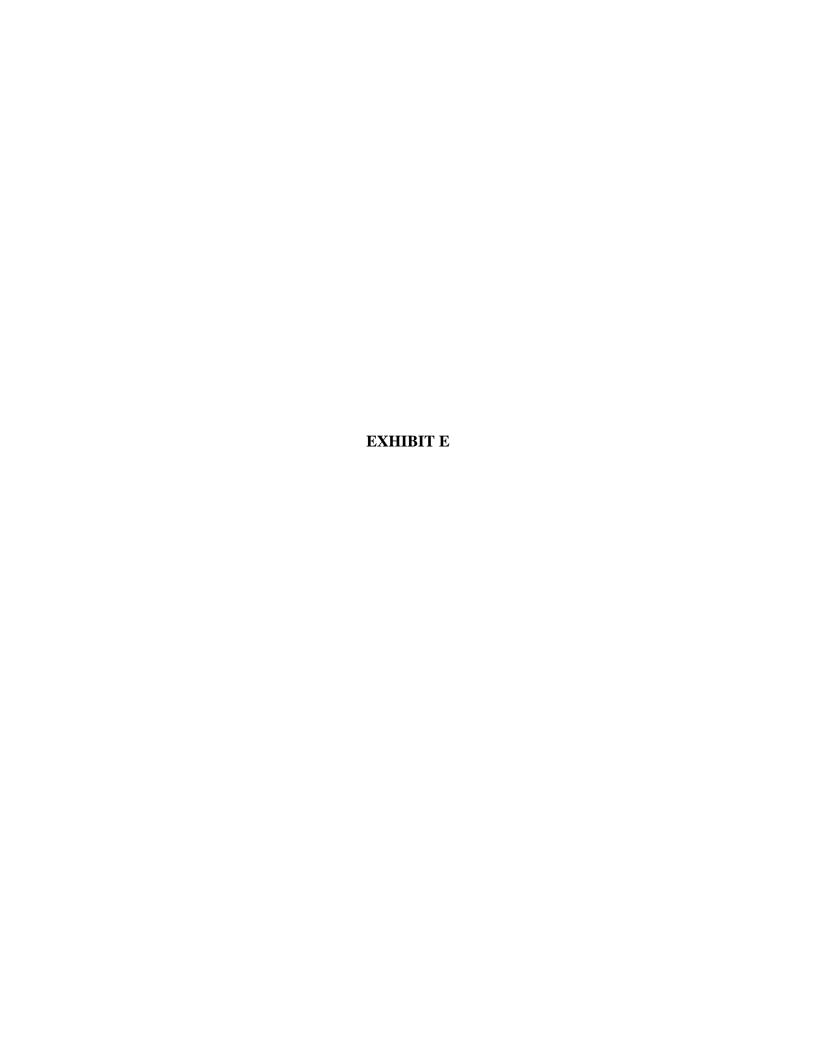
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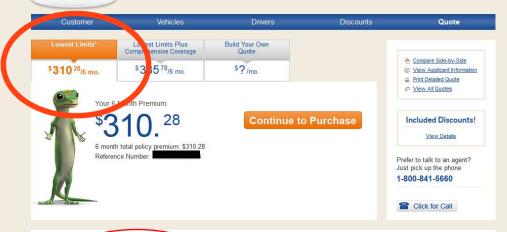
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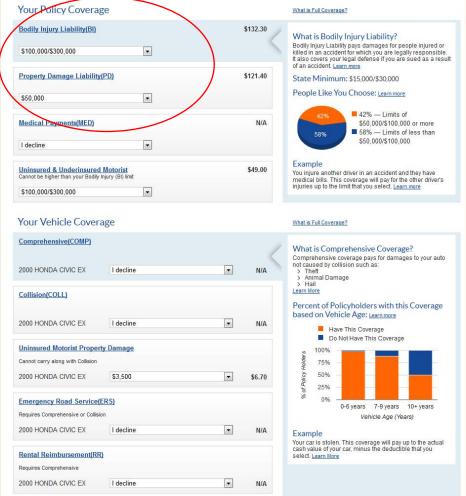
Collision deductibles that include the Uninsured Motorist deductible waiver are more expensive than the Collision deductibles that do not include the waiver.











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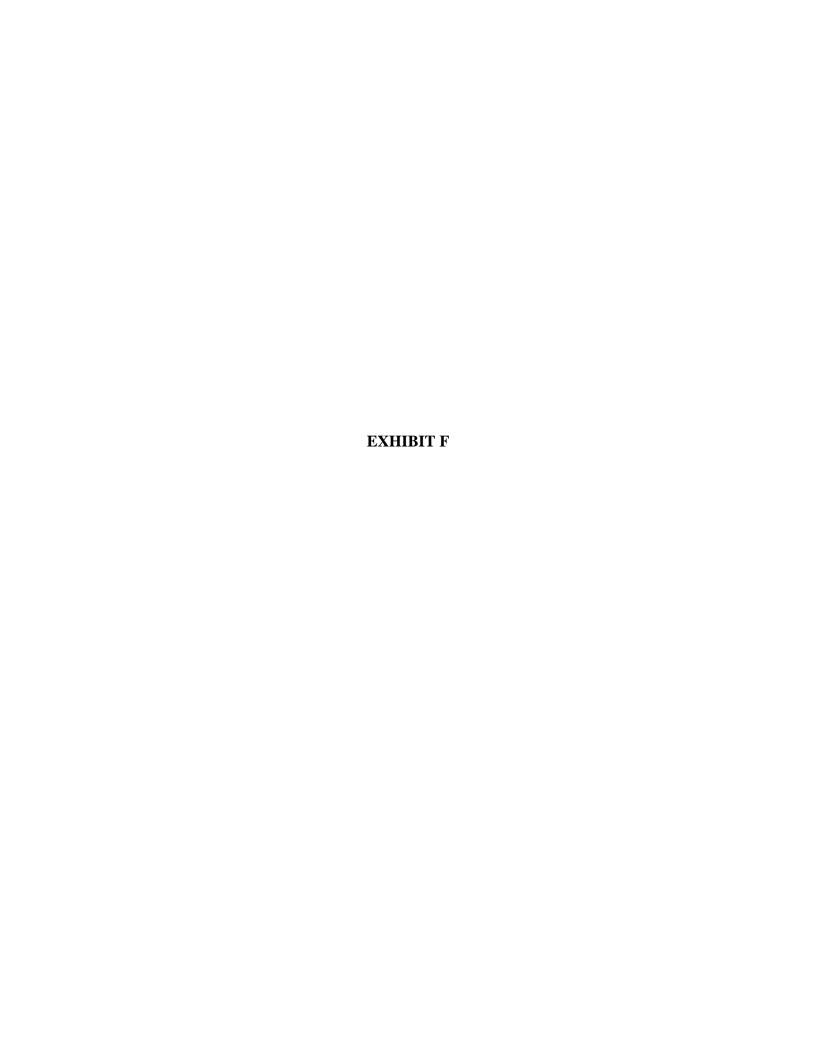
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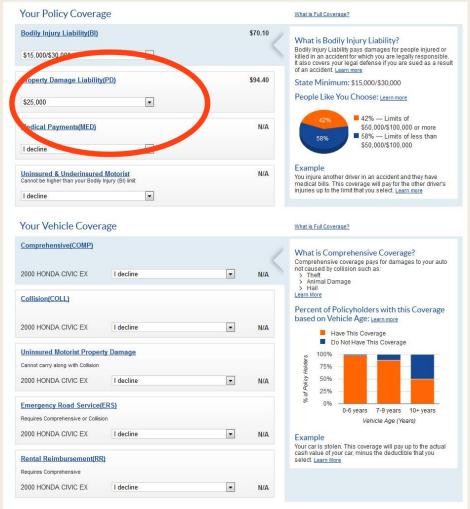
Collision deductibles that include the Uninsured motors and a not include the waiver











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1) You have not had a theft or vandalism.

1) You have not had a theft or vandalism

Please note that this rate.

Please note that this rate provide coverage for customizations to your auto. If your vehicle is customized, please call us.

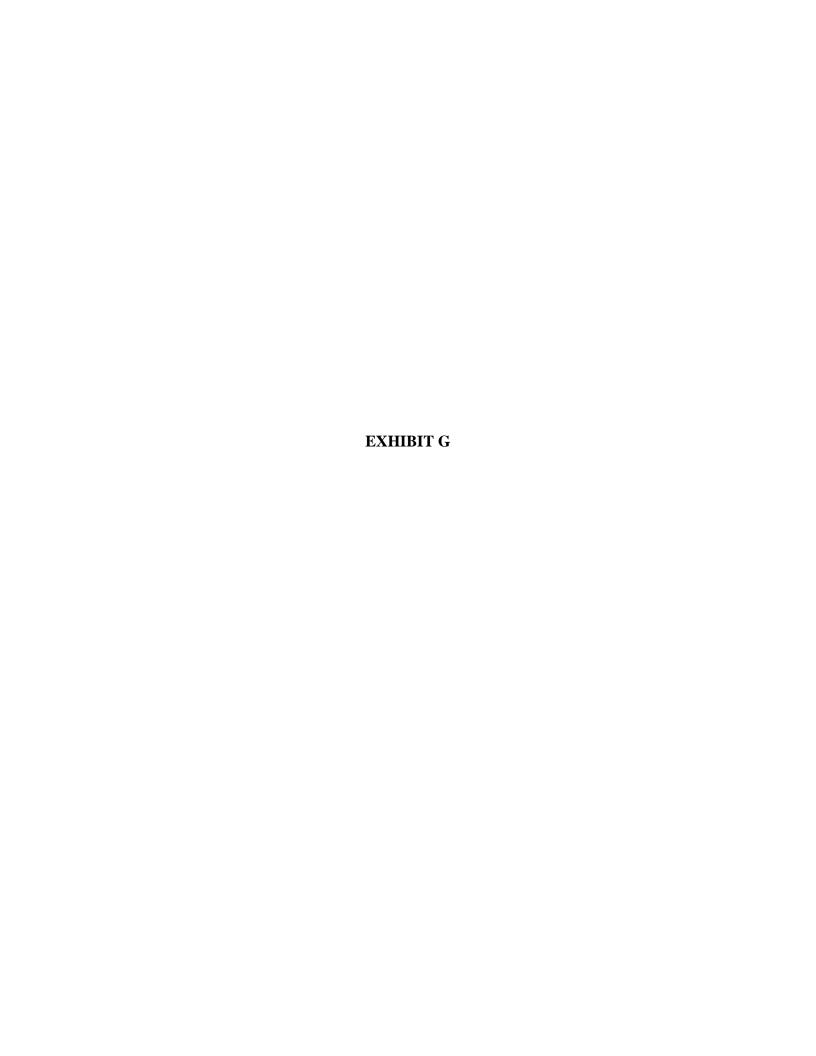
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Collision deduction. The Collision deductibles that do not include the waiver are more expensive than the Collision deductibles that do not include the waiver







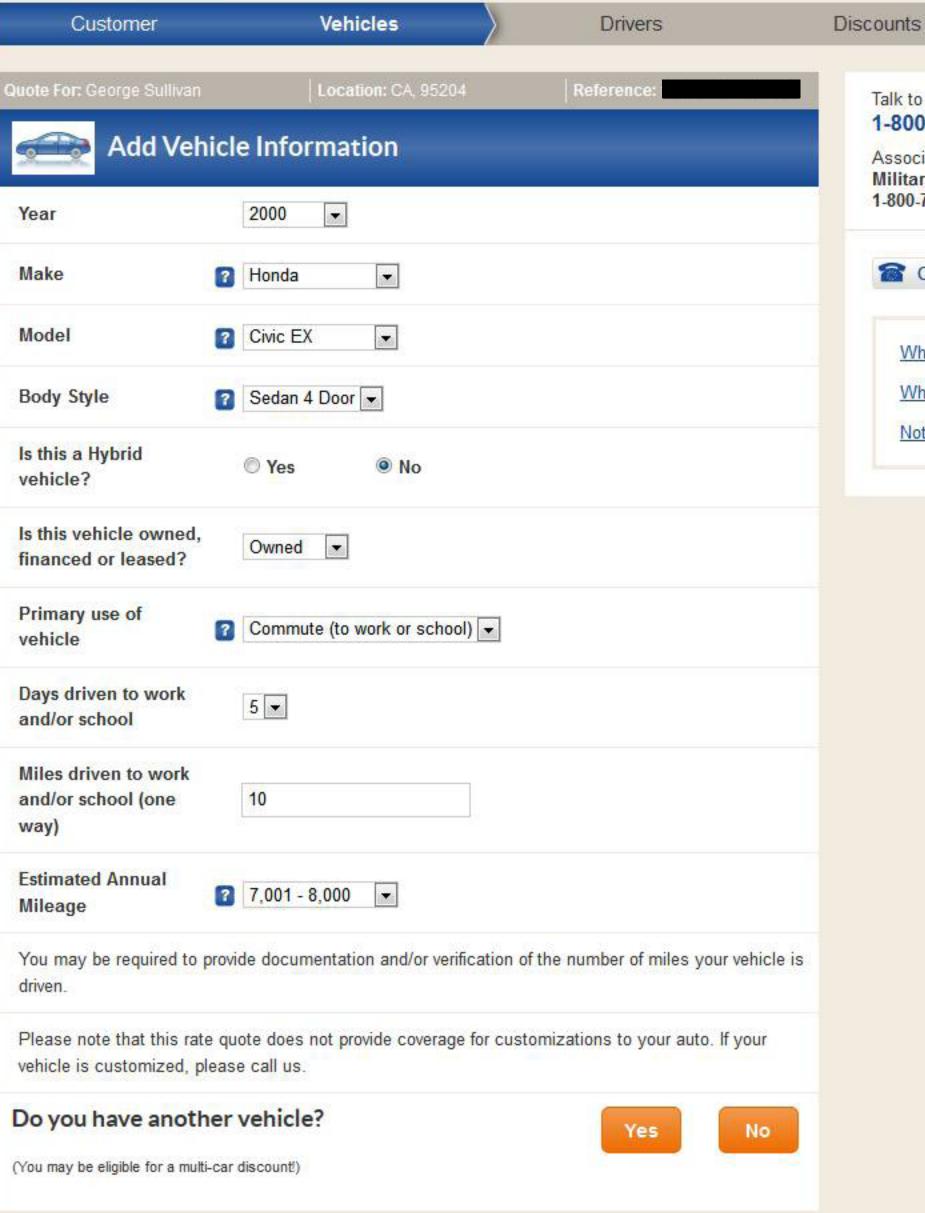
Am Leligible for a multi-policy discount for homeowners, renters or condominium insurance? ■ What if my address is FPO? What is considered "unmarried"? What if I am in the process of moving? Associated with the Military? Call us at: 1-800-720-2198 Talk to an Agent 1-800-861-8380 Discounts We need to ask you for some personal information to provide you with an accurate quote. This o No Drivers Apt O Yes 1817 N Commerce St 8 / 15 / 1984 information is kept private and secure, and will not be sold. Stockton, CA Vehides Select 'Yes' if ANY of the following apply to you: Sullivan George 95204 > I need to insure more than one driver > I need to insure more than one vehicle > I am married Customer Information Customer Date of birth First name Last name City, State ZIP Code Address

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Quote

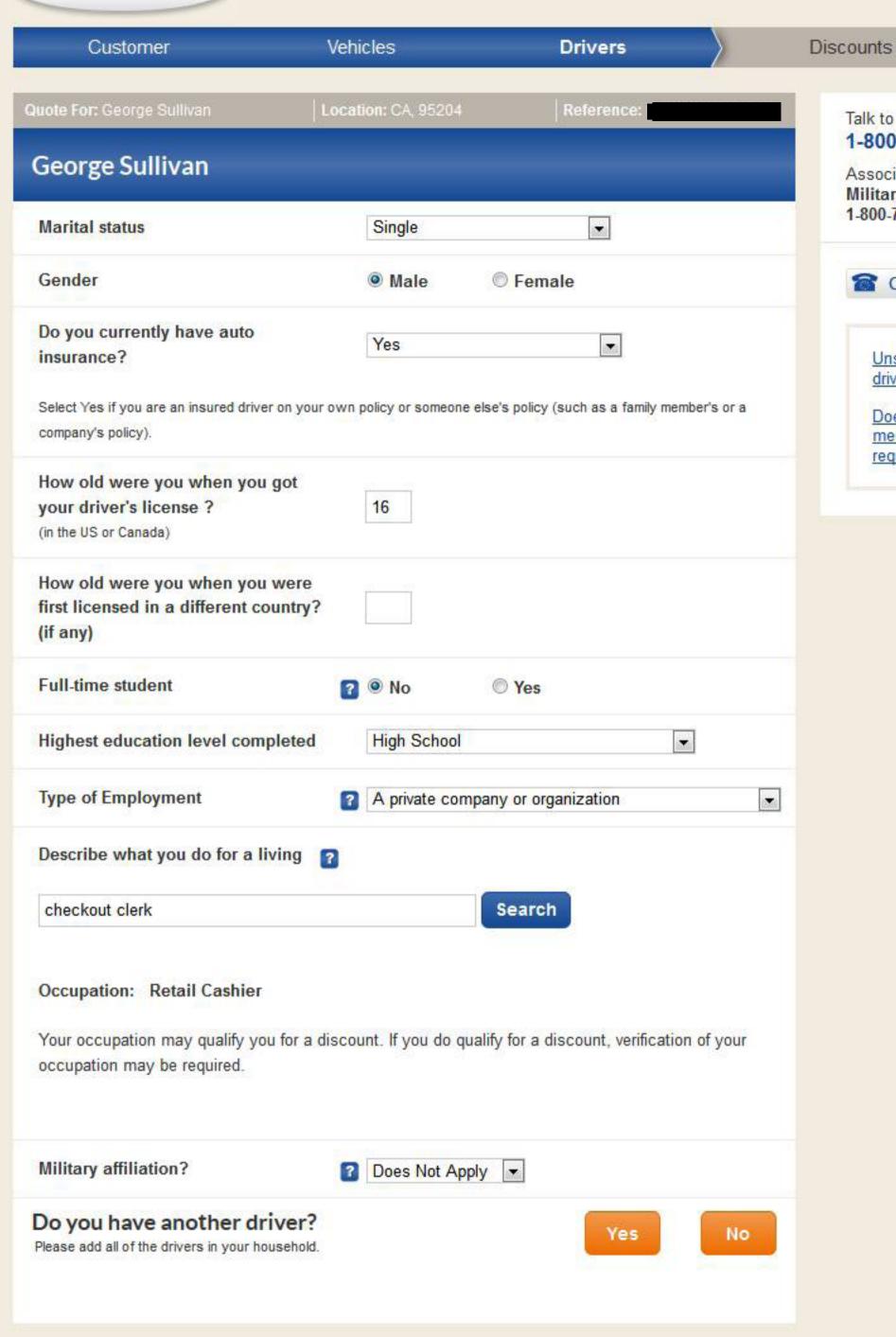


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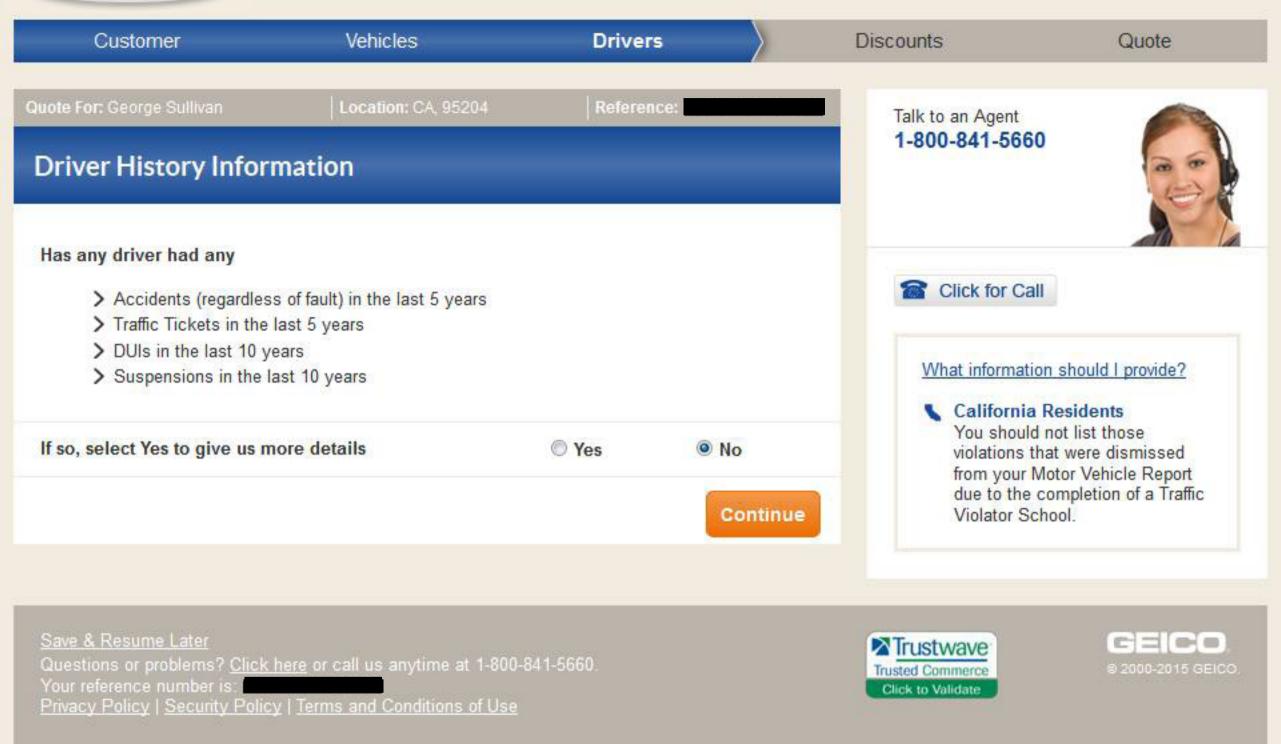
requirements?

Quote





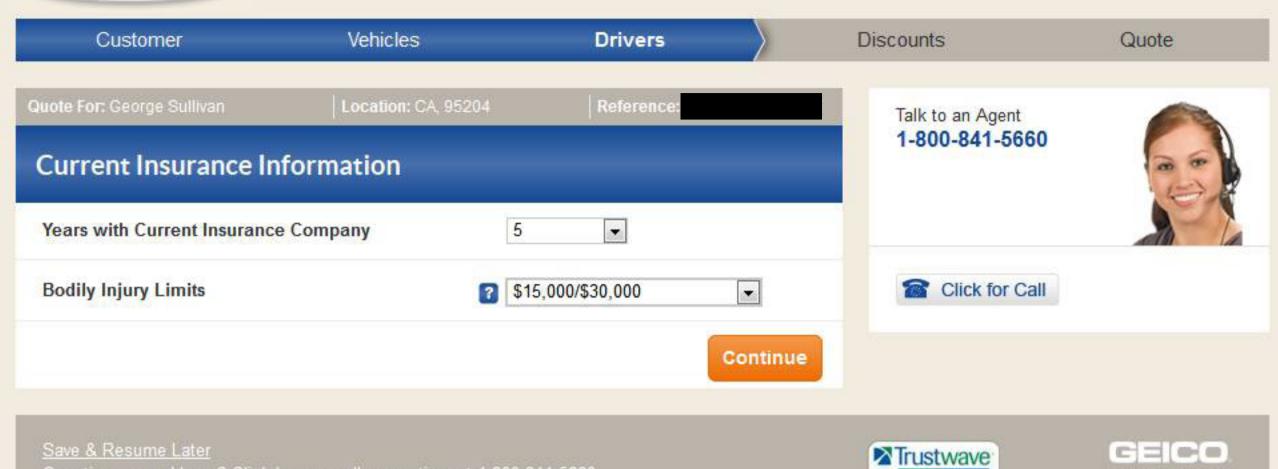






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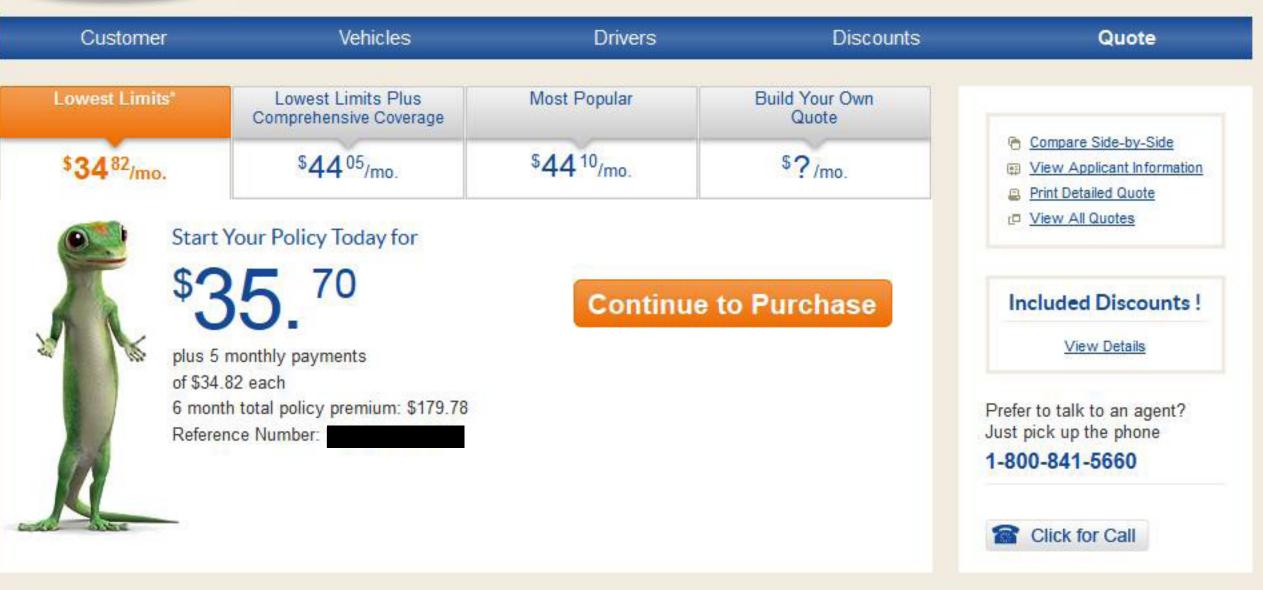


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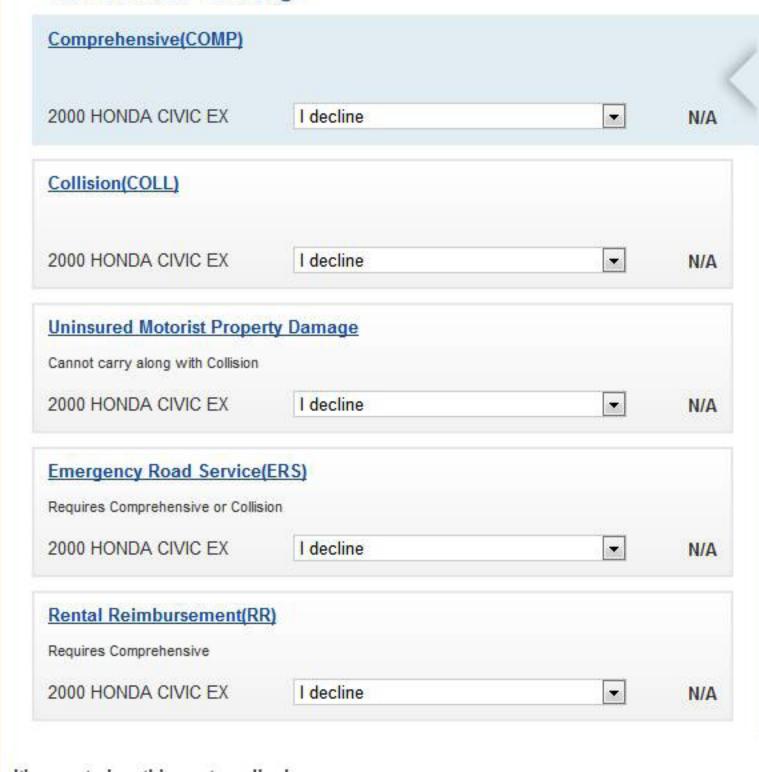




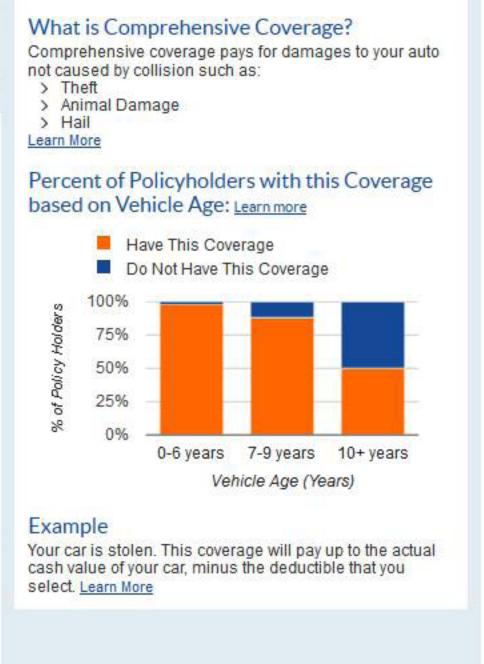








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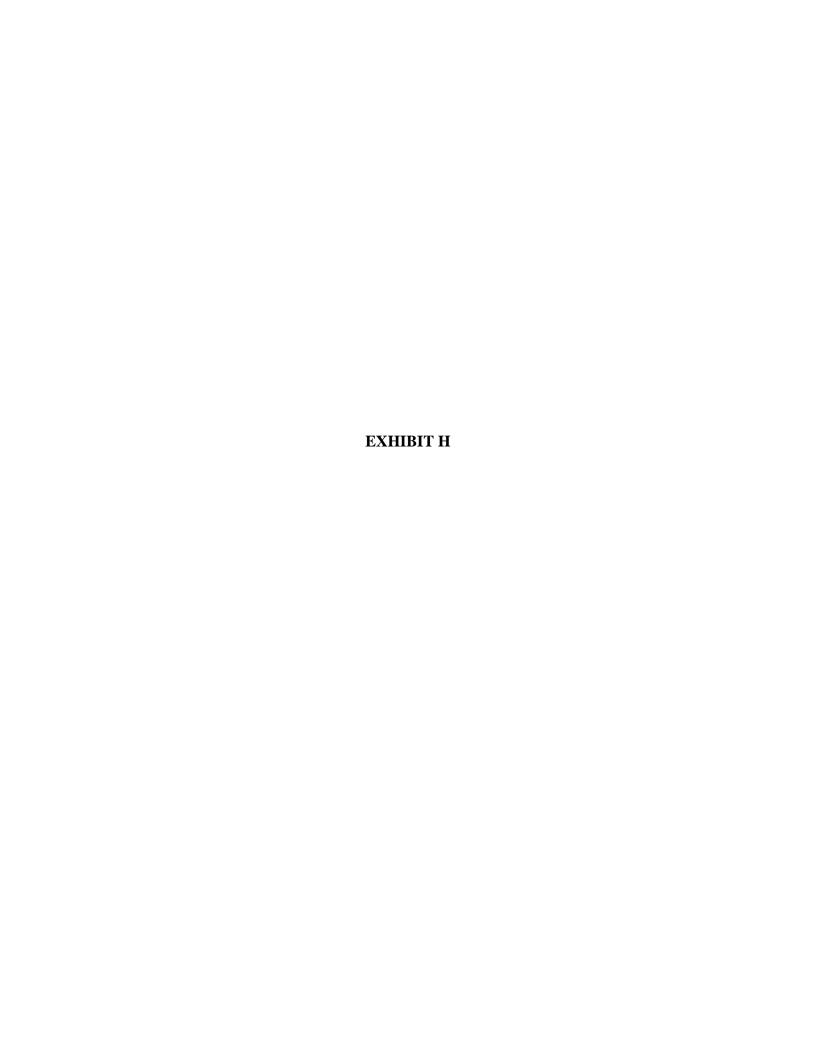
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Joe	McNulty	18171	95204	Stockton, CA	80
First name	Last name	Address	ZIP Code	City, State	Date of birth

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ON O

◎ Yes

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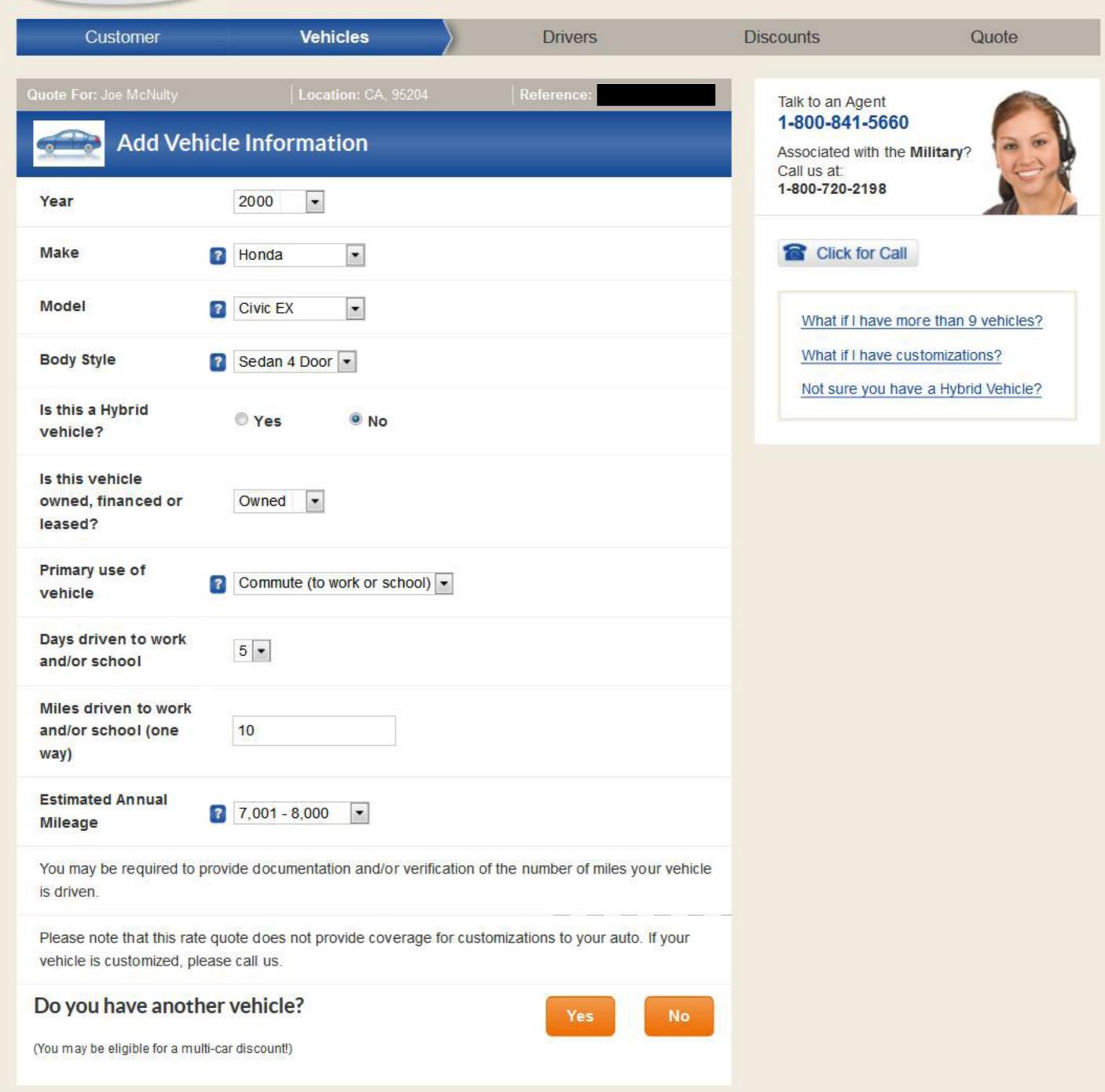
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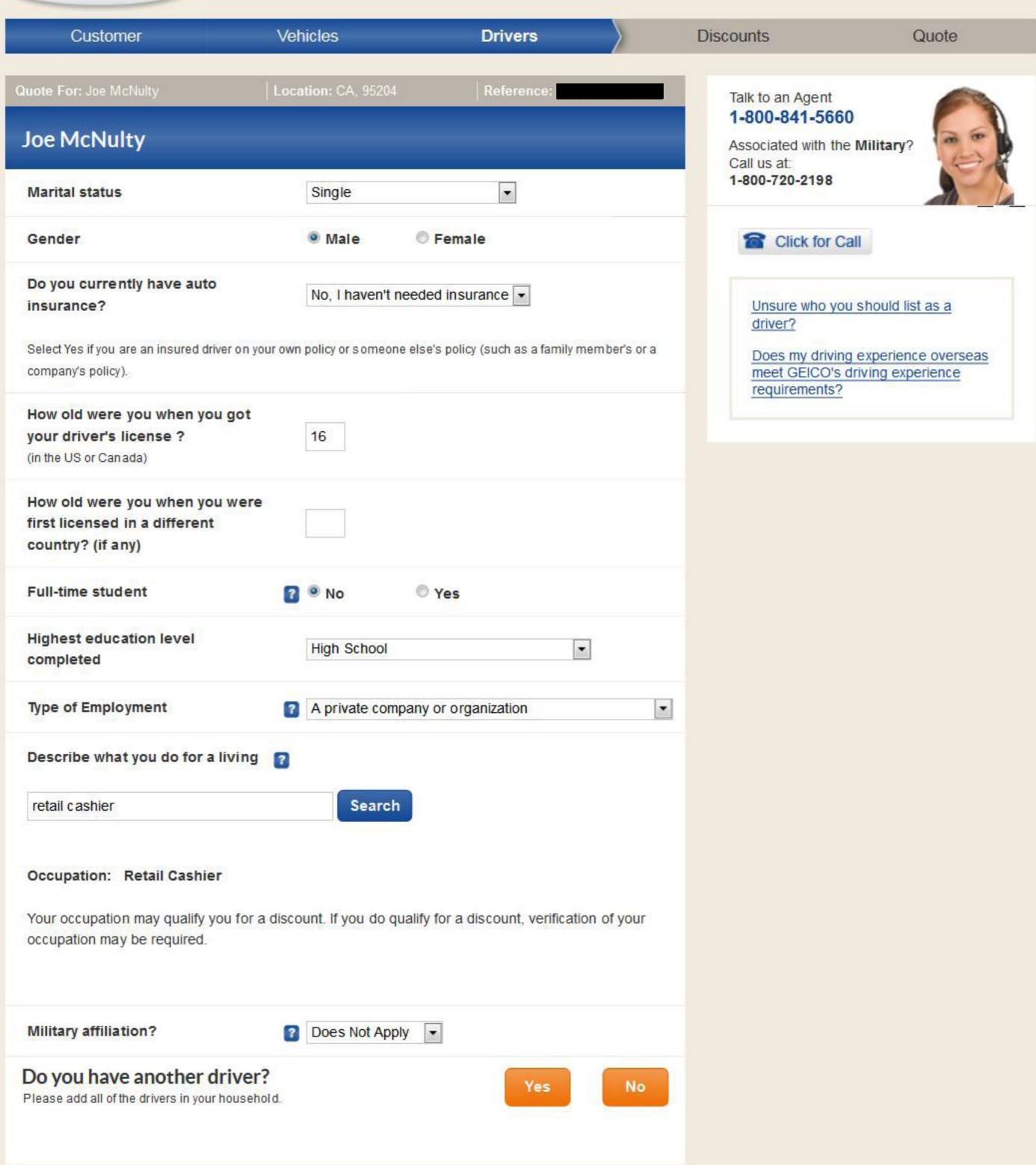








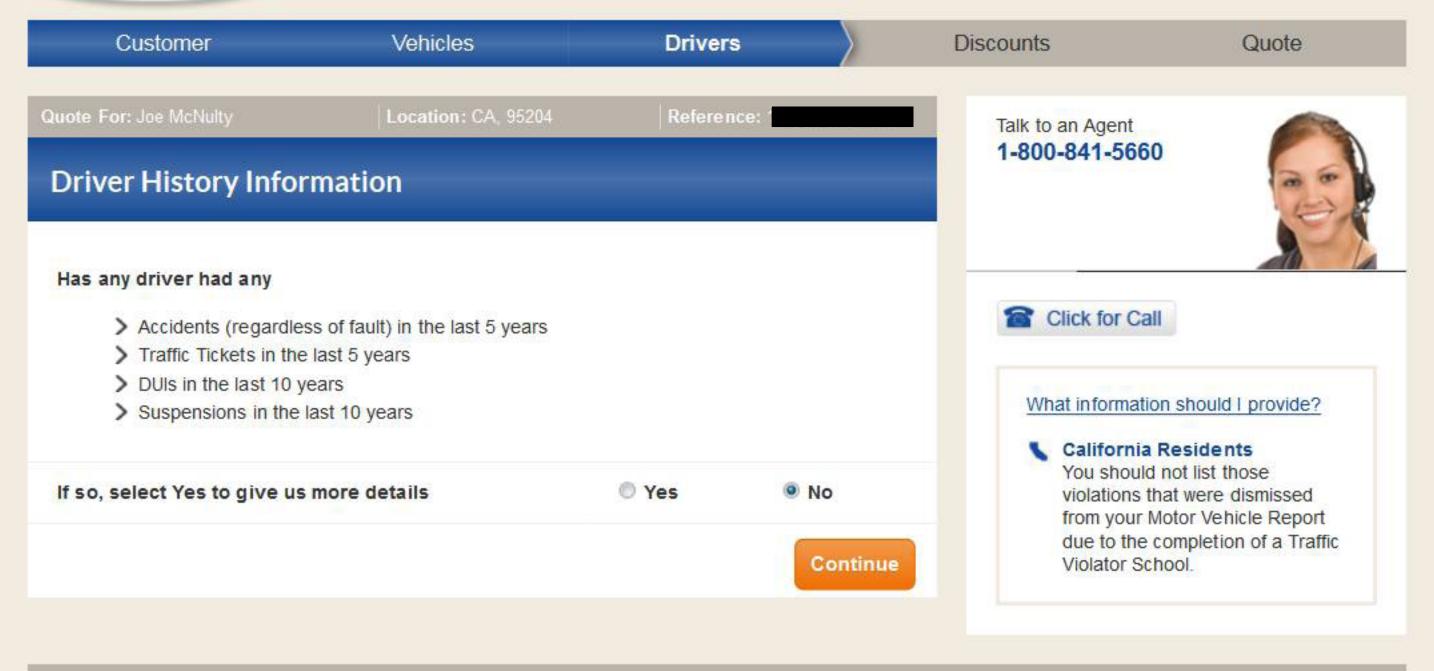












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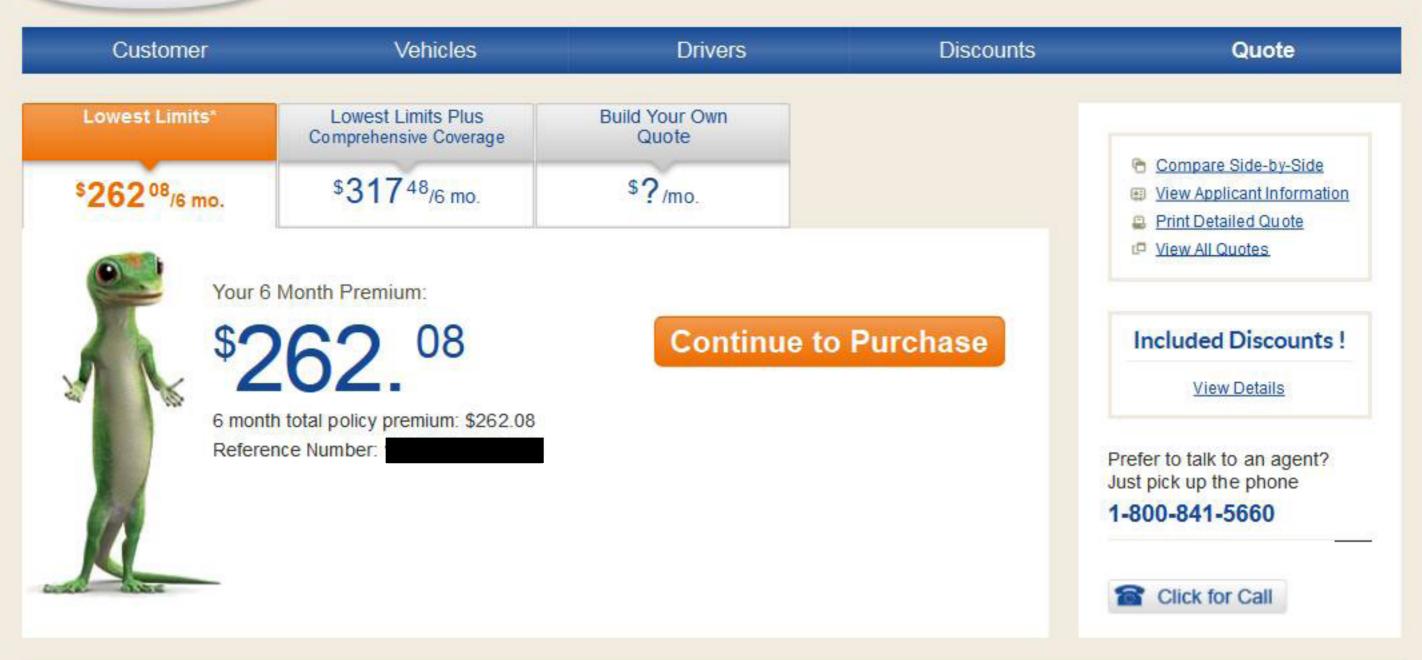


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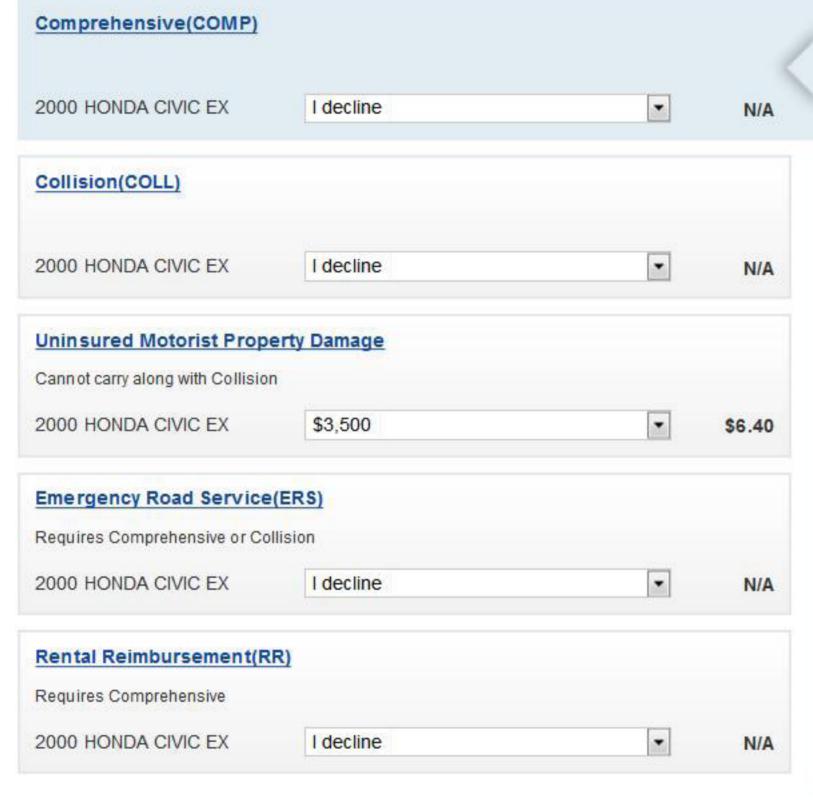




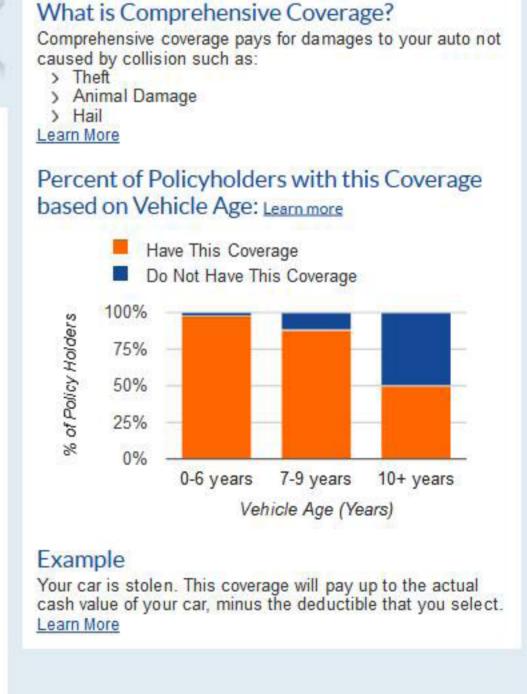








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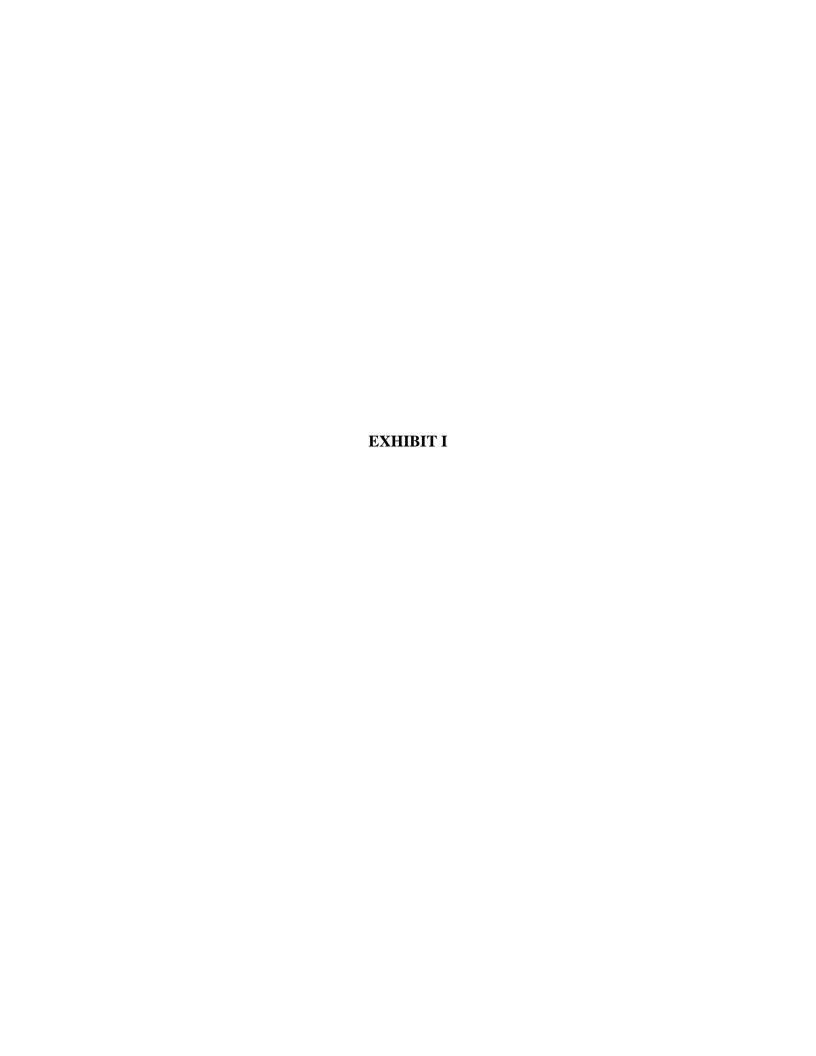
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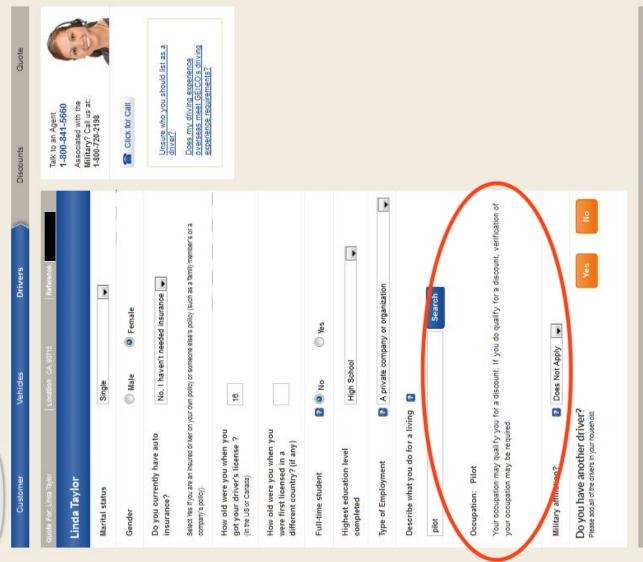
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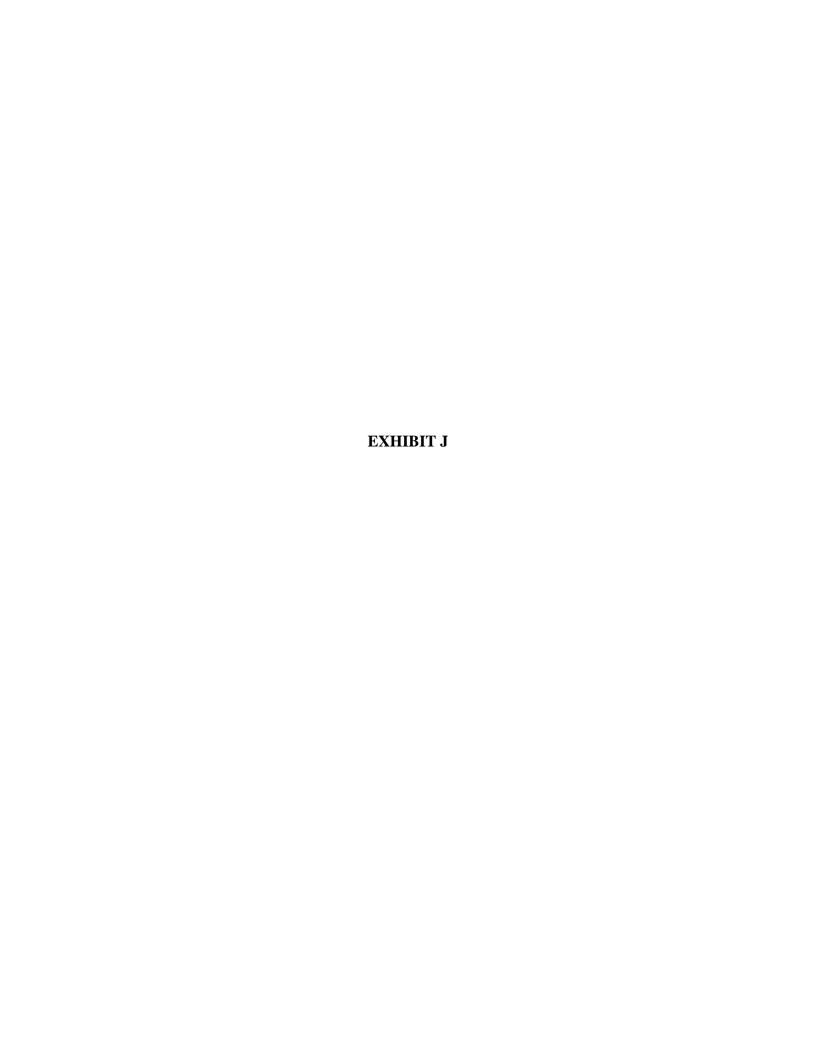




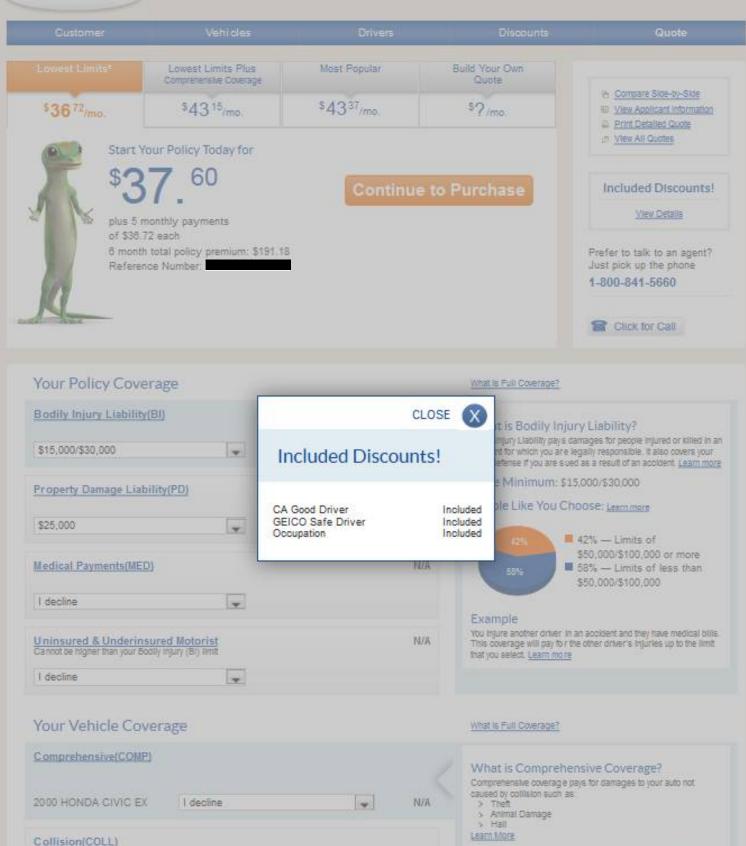




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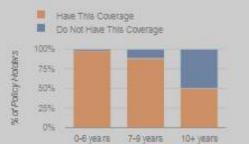


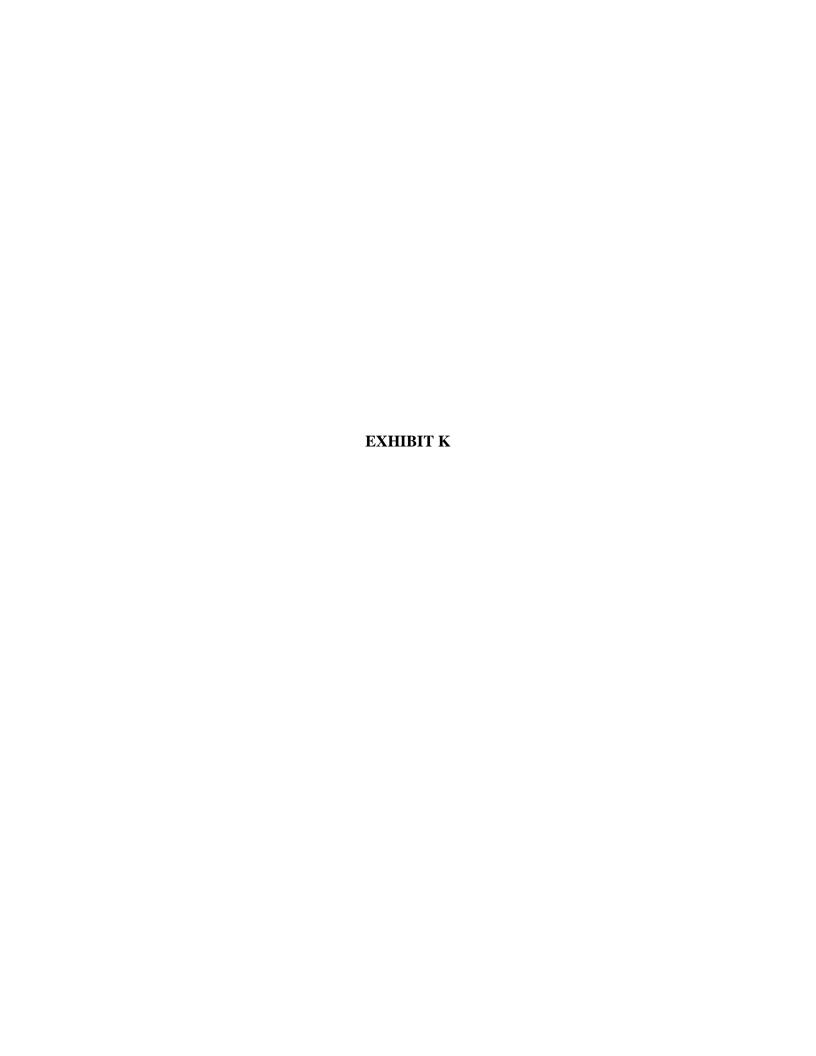




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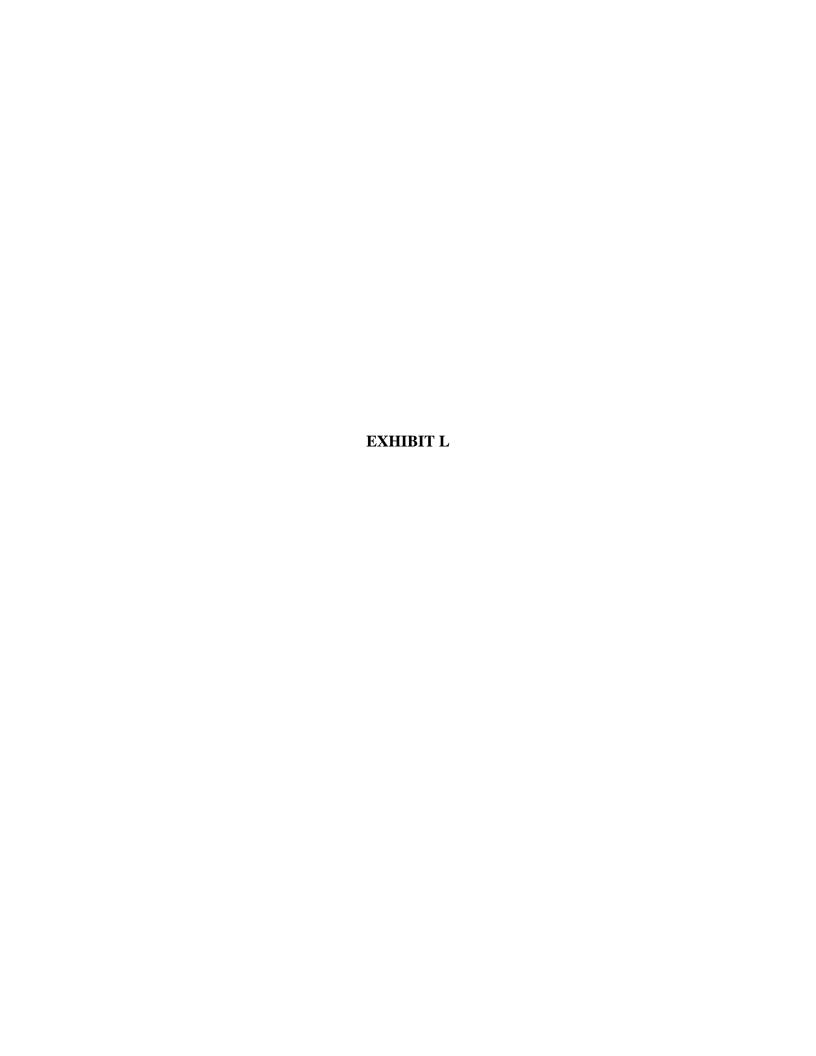
Percent of Policyholders with this Coverage based on Vehicle Age: Learn more







Bodily Injury Liability pays damages for people injured or killed in an accident for which you are legally responsible. It also covers your legal defense if you are sued as a result Wiew Applicant Information Included Discounts! You injure another driver in an accident and they have medical bills. This coverage will pay for the other driver's Prefer to talk to an agent? Compare Side-by-Side ■ 58% — Limits of less than \$50,000/\$100,000 or more Just pick up the phone Print Detailed Quote View Details 1-800-841-5660 Click for Call U View All Quotes \$50,000/\$100,000 42% - Limits of People Like You Choose: Learn more State Minimum: \$15,000/\$30,000 What is Bodily Injury Liability? of an accident Learn more Continue to Purchase Example CLOSE X Included Included Included Discounts! \$123.00 \$112,90 N/A \$45.60 Build Your Own Quote \$7 /mo. CA Good Driver GEICO Safe Driver 6 month total policy premium: \$288.68 Lowest Limits Plus Comprehensive Coverage \$358 88/6 mo. 1 > \$280°. Your 6 Month Premium: Uninsured & Underinsured Motorist Cannot be higher than your Bodily Injury (BI) limit Reference Number: Property Damage Liability(PD) Your Policy Coverage Bodily Injury Liability(BI) Medical Payments(MED) \$100,000/\$300,000 \$288 68/6 то. \$50,000 I decline

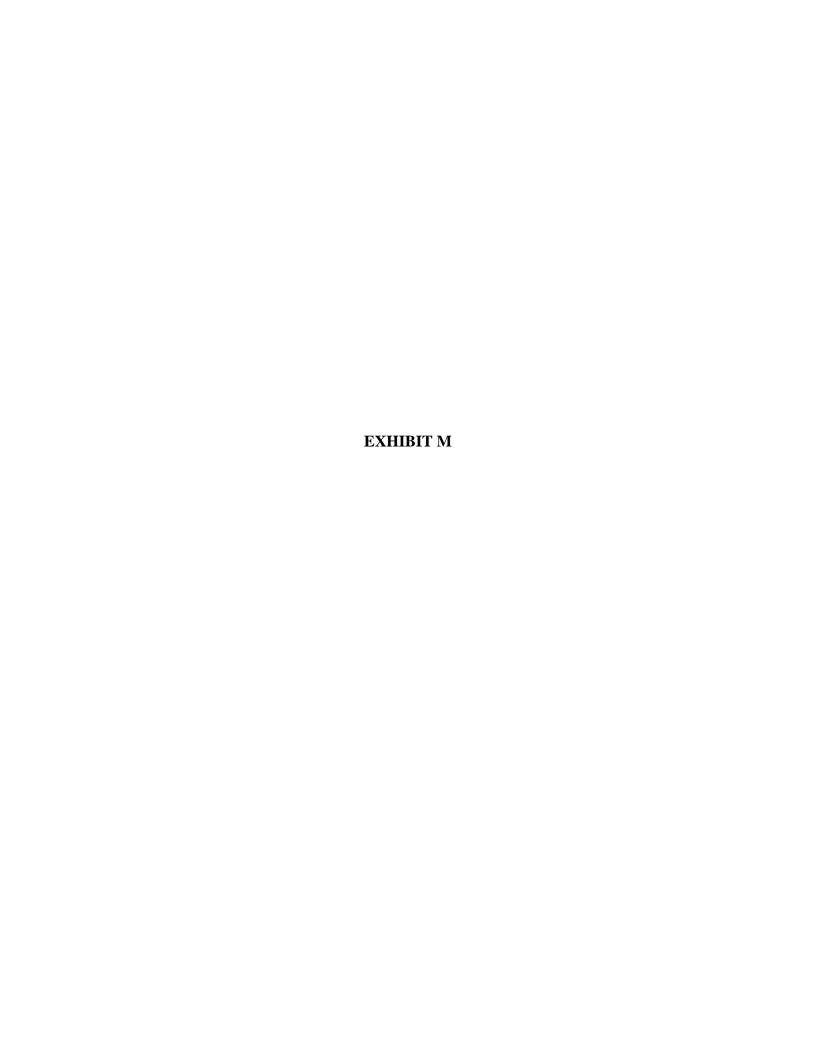


GOVERNMENT EMPLOYEES INSURANCE COMPANY PROFESSIONAL GROUP INSURANCE PLAN - CALIFORNIA Group Eligibility

*Professional Group Insurance Plan		Deleted: <u>Discount</u>
A -18.0% rate differential will be applied to the policy for Bodily Injury, Property Damage, Medical	\	Deleted:
Payments, Uninsured Motorist Bodily Injury, Uninsured Motorists Property Damage. A 25,0% rate differential will be applied to the policy for Comprehensive, and -24.0% for Collision, and -27.0% for	1/,	Formatted: Indent: Left: 0", First line: 0"
Emergency Road Service, Rental Reimbursement and Mechanical Breakdown coverage if the named	1	Deleted: 200% discountate different [[2]]
insured/applicant or spouse or registered domestic partner is an operator and is employed in one of the	$\mathcal{V}/\!\!/$	Deleted: .*
following Professional Groups, or is a graduate student, or is a professional Federal government	///	Formatted: Indent: Left: 0", First line: 0"
employee in an administrative or technical position, or has retired from one of the following Professional	/ //	
Groups and is no longer employed. These Professional Groups may require at least a Bachelor's	"//	
degree, license, or professional certification/designation.	1//	Deleted: s The named insured/applic [4]
NOTE : This differential does not apply to motor homes or travel trailers rated under Miscellaneous Rule	X //	Deleted: ¶ [5]
6.	" //.	Deleted: ¶ [6]
	///	Deleted: - The named insured/applicant [7]
Accountant, - has an Accounting degree and is employed as an Accountant.	W/Z	Deleted: - The named insured/applica [8]
Actuary	1///	
Account Executive	1/ //	Deleted: - The named insured/applicant [9]
Administrator	1 11,	Deleted: ¶
Advisor	111	Deleted: Alumni Director - The named [10]
Air Traffic Controller Airport Manager	////	Deleted: ¶ [11]
Ambassador	* //	
Analyst	1///	[12]
Anesthesiologist	////	Deleted: ¶
Architects - has a degree in Architecture and is employed as an Architect.	N/;,	Deleted: - The named insured/applican [13]
Art Appraiser	W//.	Deleted: - The named insured/applican [14]
Assistant Airport Manager,	14.7	Deleted: - The named insured/applican [15]
Assistant City Manager	47/	
Assistant Operations Manager	Y/Z	[10]
Assistant Personnel Manager Assistant Principal	¥/:	Deleted: ¶
Assistant Productions Manager	X!/	Deleted: - The named insured/applican [17]
Assistant Range Manager	Y/	Deleted: ¶ [18]
Audiologist	X/.	Deleted: ¶ [19]
Bank Examiner,	X/.	Deleted: - The named insured/applicar [20]
Bank Manager	//	[20]
Bank Officer .	X /	Deleted: ¶ [21]
Bank Owner	//	Deleted: ¶ [22]
Berkshire Hathaway Employees —must be employed by or retired from Berkshire Hathaway or any of its 80% or more owned subsidiaries.	Y /	Deleted: Bonds Broker - The named [23]
Broadcaster		Deleted: .¶ [24]
Cartographer	//	Deleted: - The named insured/applican [25]
Child Counselor	/ /	1. ([25]
City Manager	1/	[20]
Claims Examiner	///	Deleted: s - The named insured/applica [27]
Coach	X//	Deleted: ¶ [28]
Commercial Artist,	X/ ,	Deleted: - The named insured/applicar [29]
Comptroller,	<i>1 /</i> .	Deleted: ¶ [30]
Computer Programmer Computer Systems Engineer	1//	Deleted: ¶
Conservationist.	$\chi//$	Section Break (Next Page) [31]
Construction Inspector		Deleted: ¶
Consultant	//	
Controller (Financial)	11	Deleted: - The named insured/applicar [32]
Co-op Agent	1 /	Deleted: 3
	/	1

Deleted: 08/30/...1/01/20112007

... [1]





Quote Discounts Drivers Vehicles Customer

Customer Information

We need to ask you for some personal information to provide you with an accurate quote. This information is kept private and secure, and will not be sold.

Associated with the Military? Call us at: 1-800-720-2198

1-800-861-8380 Talk to an Agent



Apt 2 12838 Blanco Court Address

discount for homeowners, renters or

condominium insurance?

Am I eligible for a multi-policy

What if my address is FPO?

What if I am in the process of

moving?

What is considered "unmarried"?

92064 ZIP Code

Poway, CA

City, State

Date of birth

8 / 29 / 1984

Select 'Yes' if ANY of the following apply to you:

> I need to insure more than one driver > I need to insure more than one vehicle

> I am married

© Yes

o No

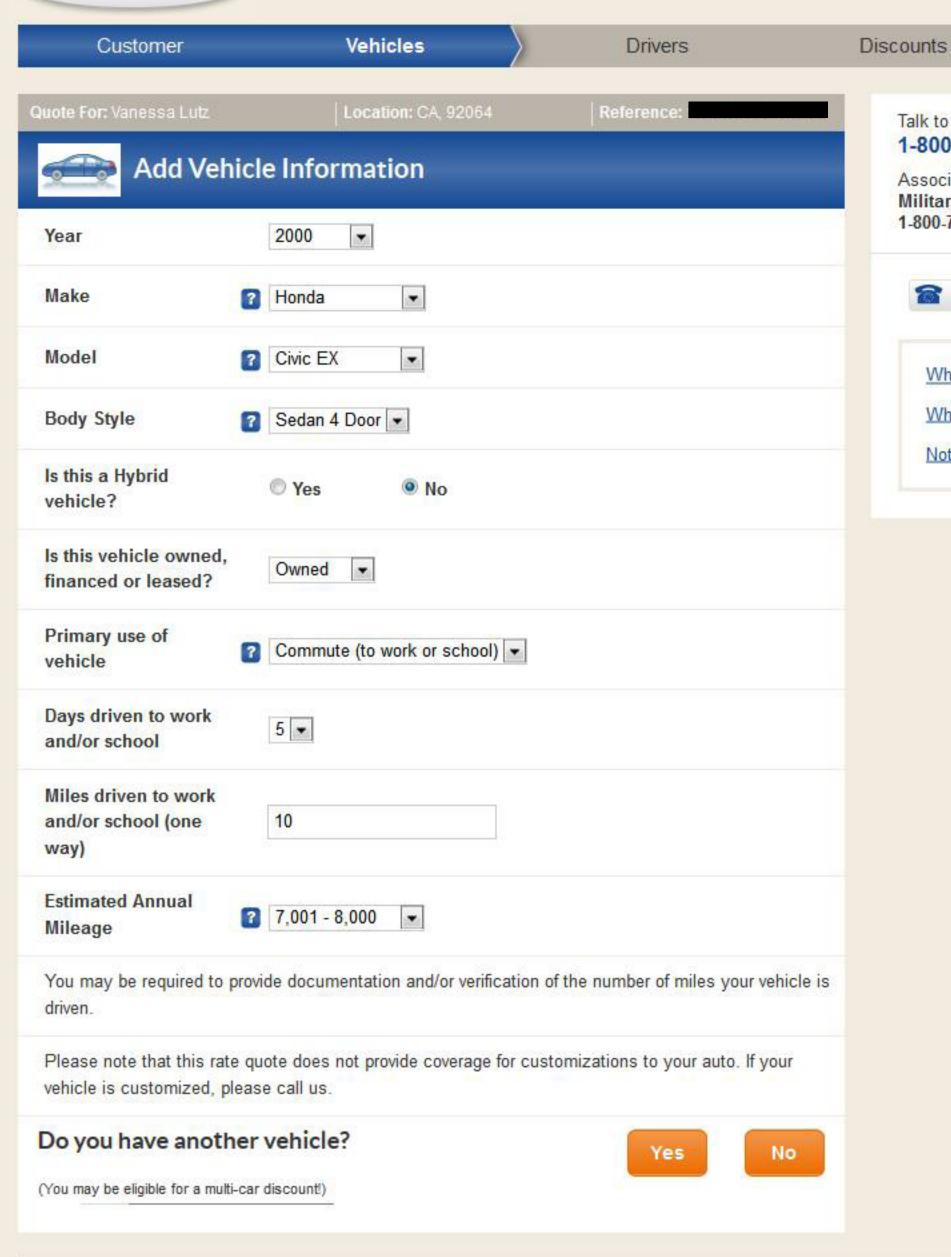
Continue











Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198

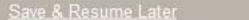
Click for Call



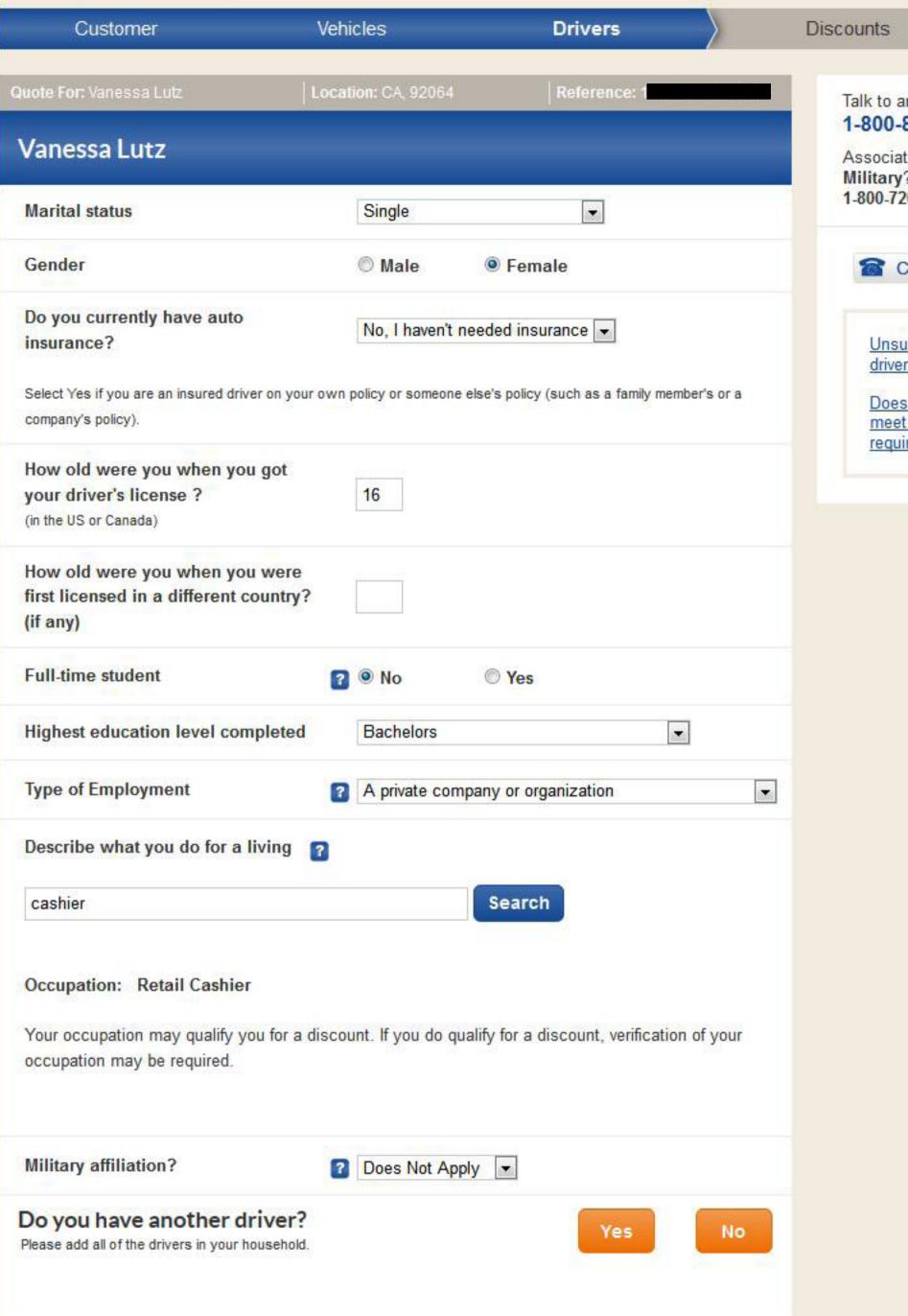
Quote

What if I have more than 9 vehicles?
What if I have customizations?

Not sure you have a Hybrid Vehicle?







Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198

Click for Call

Unsure who you should list as a driver?

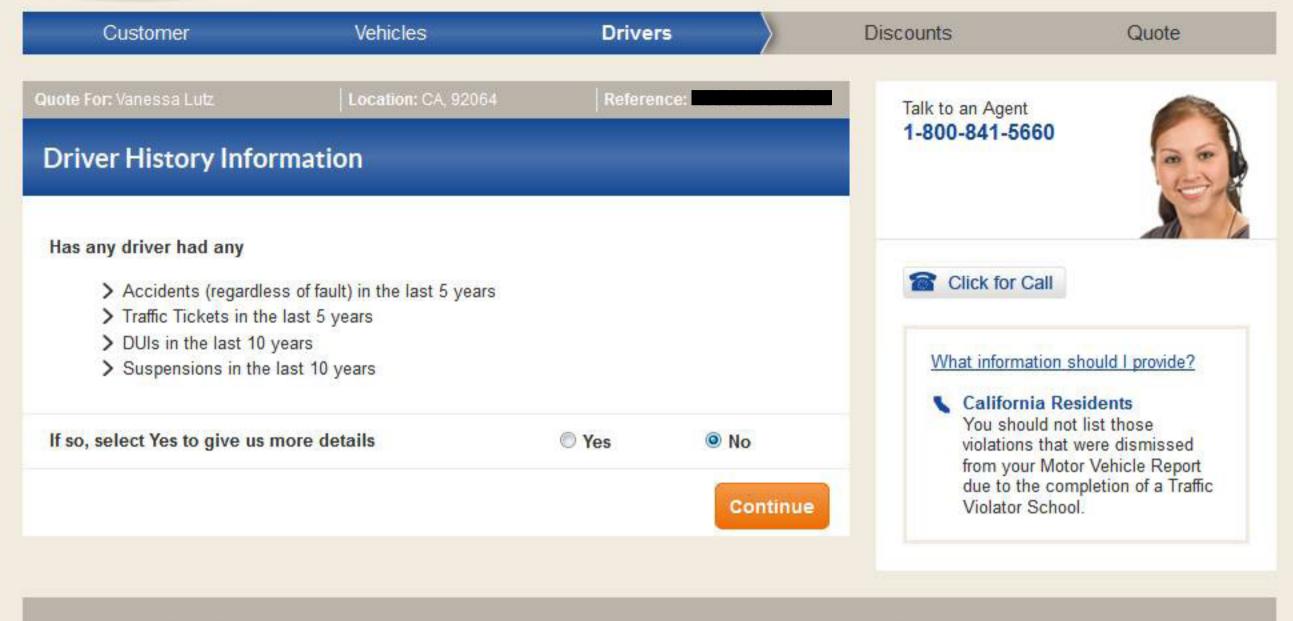
Does my driving experience overseas meet GEICO's driving experience requirements?

Quote









Save & Resume Later

Questions or problems? Click here or call us anytime at 1-800-841-5660.

Your reference number is: 1

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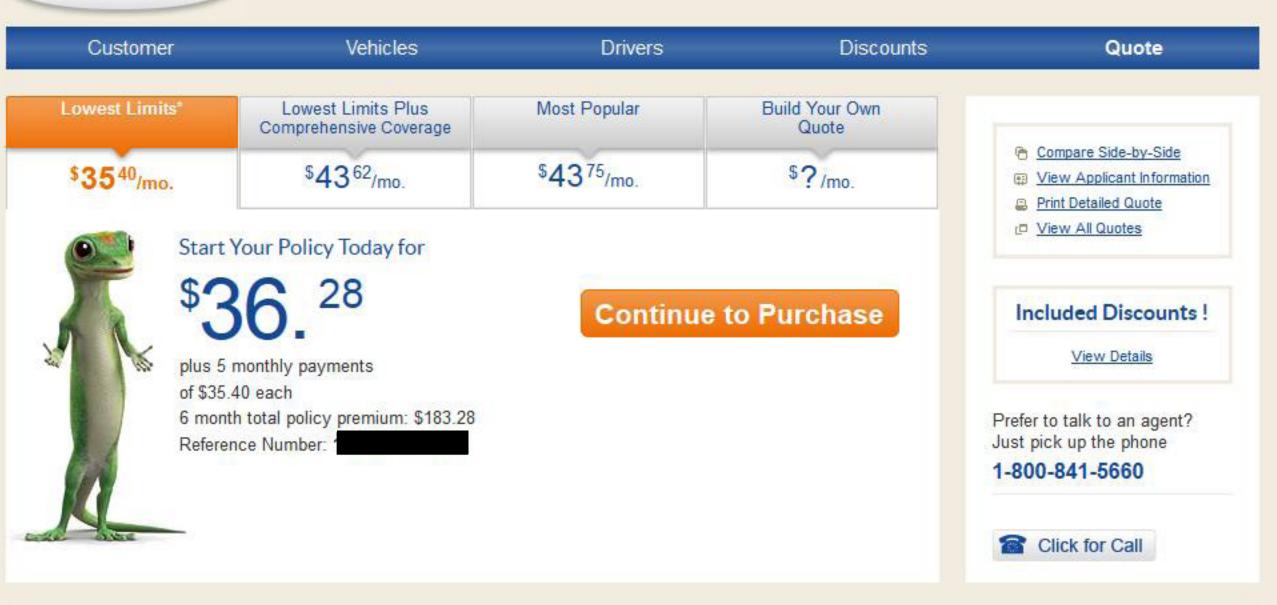


Vehicles Discounts Quote Customer Drivers Quote For: Vanessa Lutz Reference Talk to an Agent 1-800-841-5660 Discounts Answer the questions below to let us quote the lowest rate. Do you belong to any of these types of groups? Check all that apply: Click for Call Alumni Associations, Colleges and Universities Did you know GEICO could help you with motorcycle, homeowners, and renters insurance? When you carry more than one type of policy you may qualify for a multi-policy discount. Berkshire Hathaway Affiliates **Business and Professional Organizations Credit Unions** Fraternities, Sororities, and Honor Societies Organizations for Members of the Military Organizations for Education Other (RCI Timeshare owners, National Geographic subscribers, ACTIVE Network) Now, select your group from the list below: Not a member of any of these organizations Save Your Quote... Provide an email address to return to your quote. **Email Address** This email address will be used to send you emails about your quote. We respect customer privacy and do not sell email addresses. Contact number Go Paperless Paperless Bills via email: No thanks, maybe later Yes! No thanks, maybe later Paperless Policy online: Yes! By selecting "Yes" you are accepting our Terms & Conditions. One click away from your quote! Continue



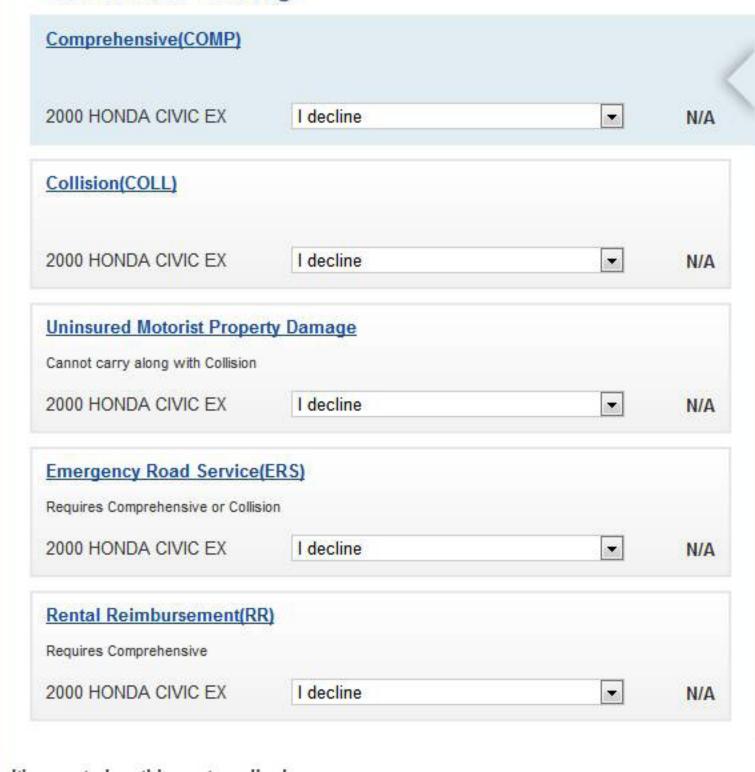




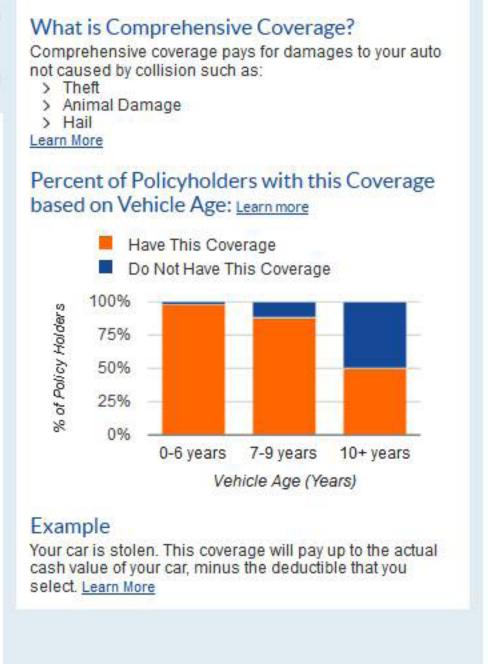




Your Vehicle Coverage



What is Full Coverage?



It's easy to buy this quote online!
You can also call 1-800-841-5660 or visit a local office.

Continue to Purchase

*Important Messages

We rely on your accurate statements when we provide you with a quote. However, we will verify your information through motor vehicle and claims reports if you decide to purchase a policy from GEICO General Insurance Company.

*Assumptions were used in your quote.

Need to make changes to these assumptions? One of our professional agents will be happy to assist you.

1) You have not had a theft or vandalism.

Please note that this rate quote does not provide coverage for customizations to your auto. If your vehicle is customized, please call us.

GEICO reserves the right to not insure vehicles that were totaled, reconstructed, or significantly damaged due to natural disasters (flood, fire, hail).

If you pay your premium in installments, each payment includes an installment fee.

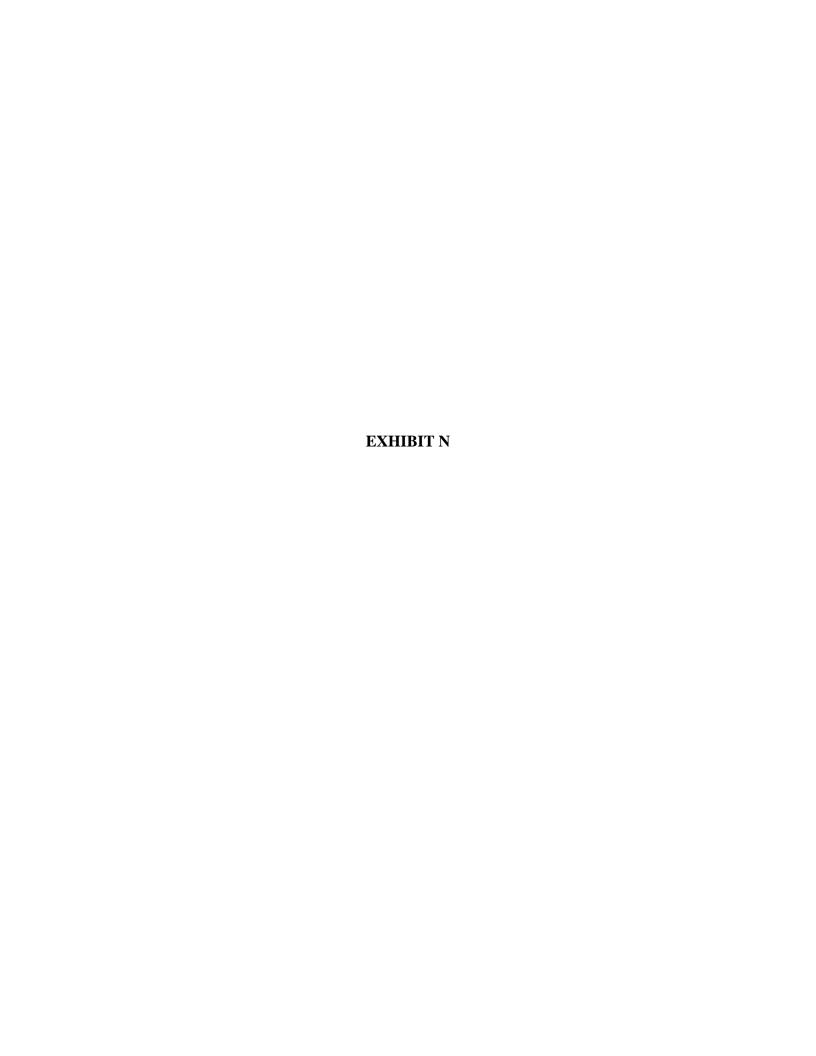
The "Similar Coverage" package quote is based solely on your current bodily injury coverage limits. It may not match your other current coverages, nor your current deductibles. The "Lowest Limits" package quote includes the lowest bodily injury limits that we offer in your state, but may not represent the lowest limits available for other coverages, nor the lowest possible deductibles.

Additional limits may be available. If you need a quote for a limit not shown, please call us.

Collision deductibles that include the Uninsured Motorist deductible waiver are more expensive than the Collision deductibles that do not include the waiver.

Coverage is subject to the terms, limits and conditions of the policy contract.







Quote Discounts Drivers Vehicles Customer

Customer Information

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Associated with the Military? Call us at: 1-800-720-2198

1-800-861-8380 Talk to an Agent

> Erickson Ariel First name Last name

Apt 12838 Blanco Ct Address

discount for homeowners, renters or

condominium insurance?

Am I eligible for a multi-policy

What if my address is FPO?

What if I am in the process of

moving?

What is considered "unmarried"?

92064

Poway, CA

8 / 02 / 1984

Date of birth

City, State

ZIP Code

Select 'Yes' if ANY of the following apply to you:

> I need to insure more than one driver > I need to insure more than one vehicle

o No

© Yes

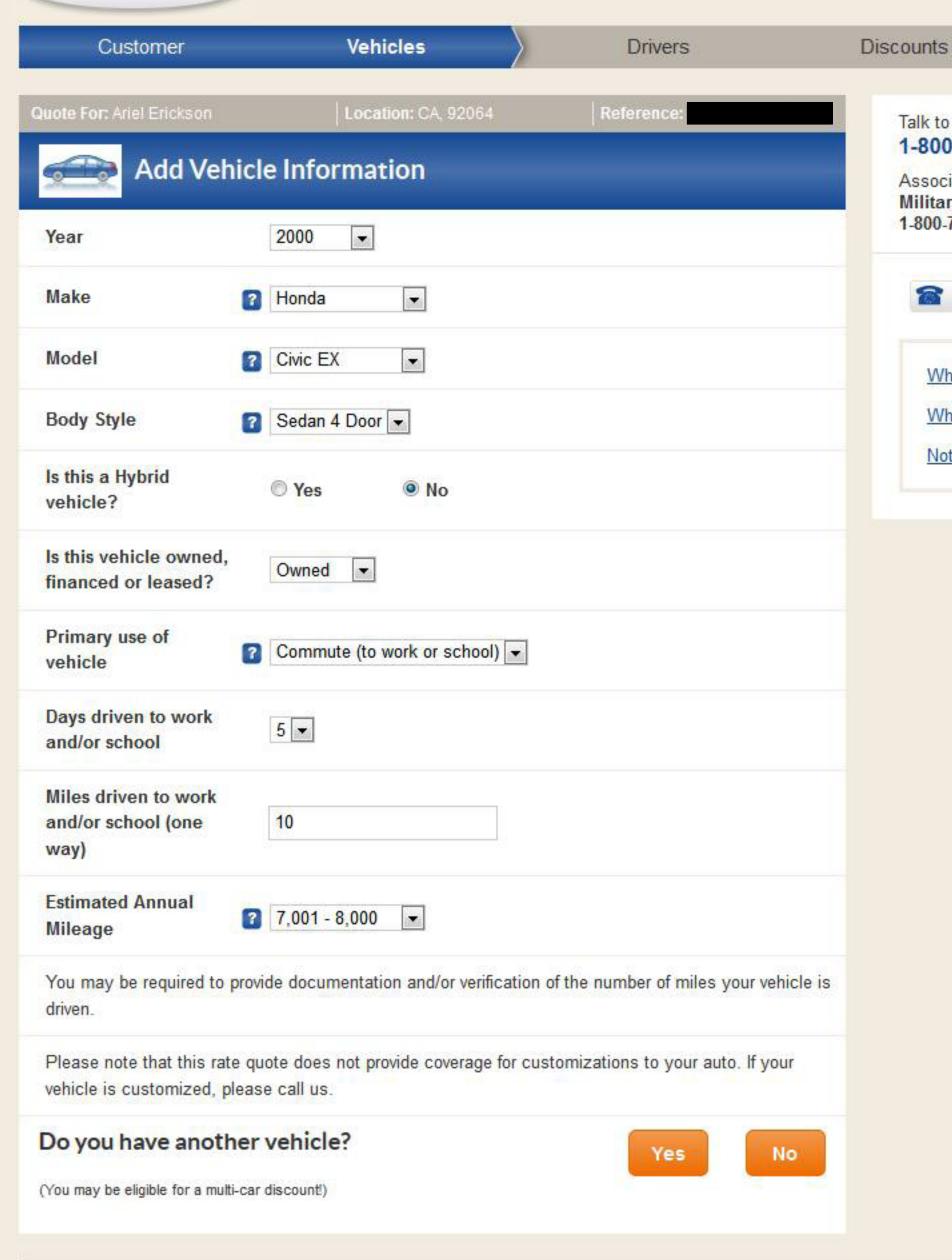
> I am married

Continue









Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198

Click for Call

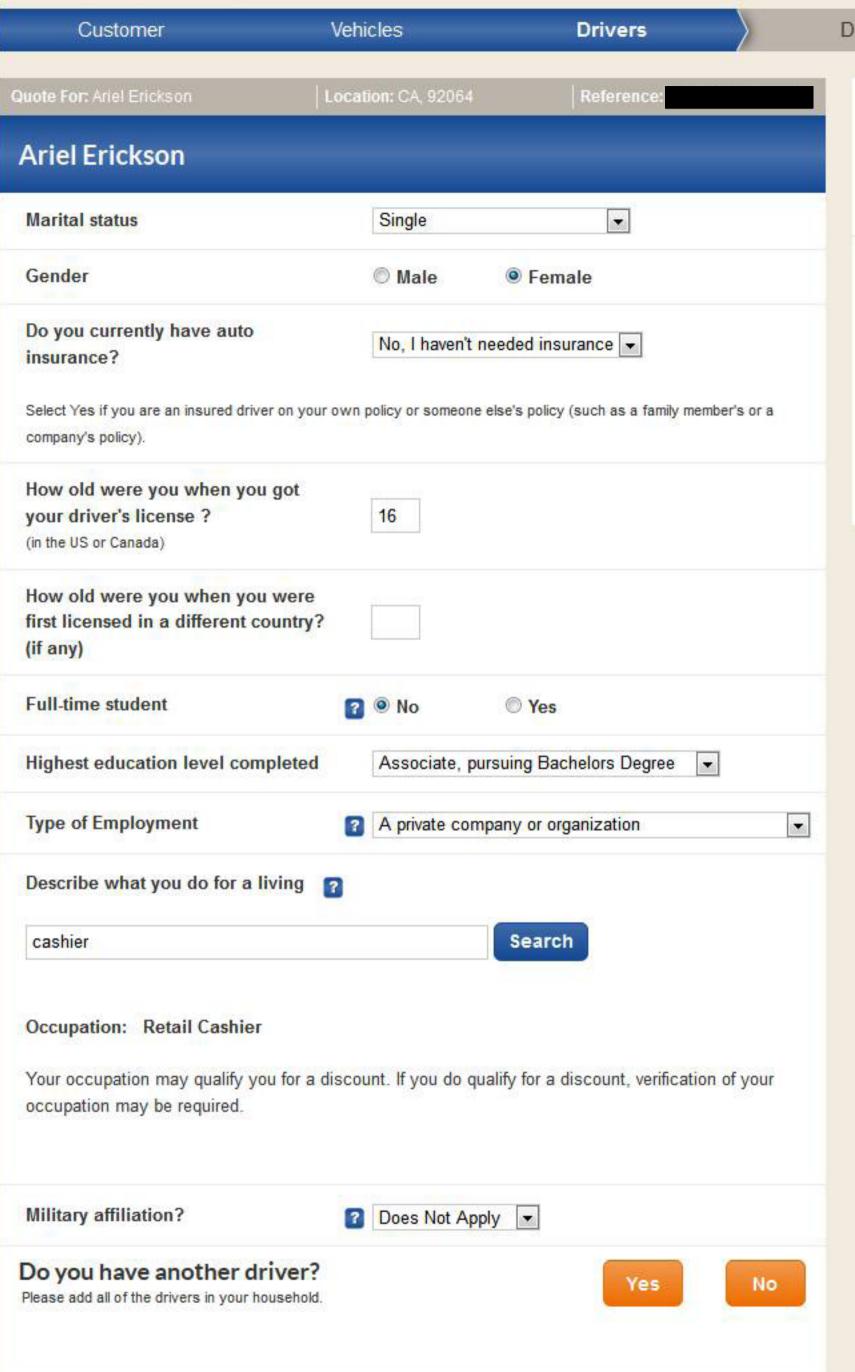


Quote

What if I have more than 9 vehicles?
What if I have customizations?

Not sure you have a Hybrid Vehicle?



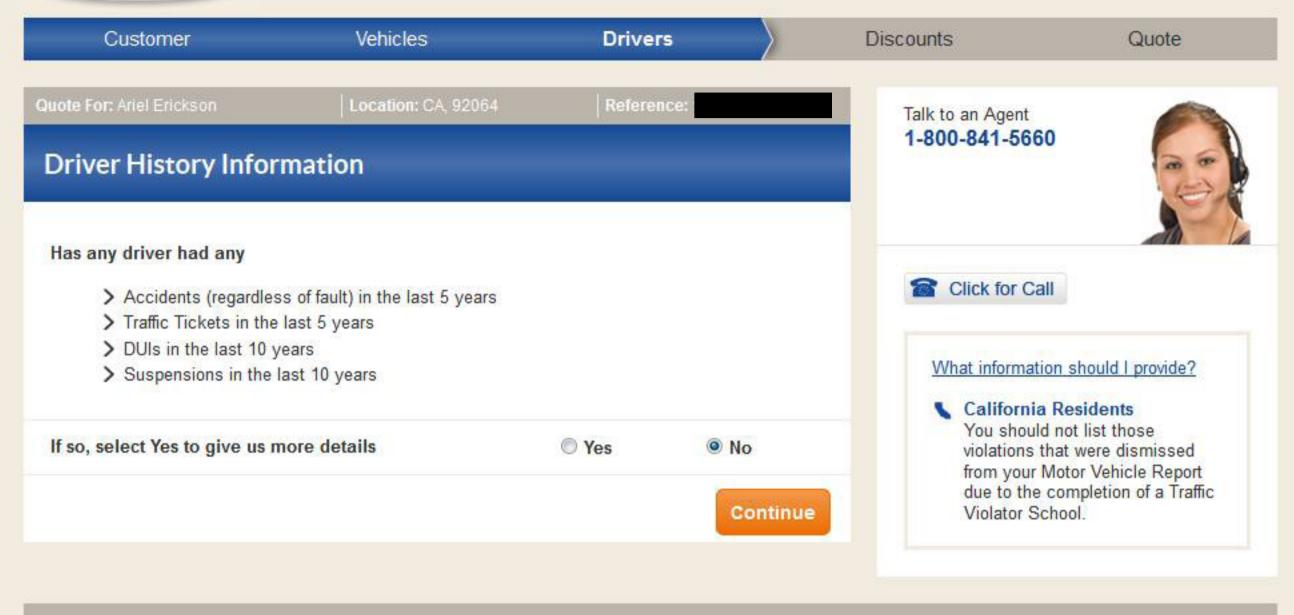


Quote Discounts Talk to an Agent 1-800-841-5660 Associated with the Military? Call us at: 1-800-720-2198 Click for Call Unsure who you should list as a driver? Does my driving experience overseas meet GEICO's driving experience requirements?









Save & Resume Later

Questions or problems? Click here or call us anytime at 1-800-841-5660.

Your reference number is:
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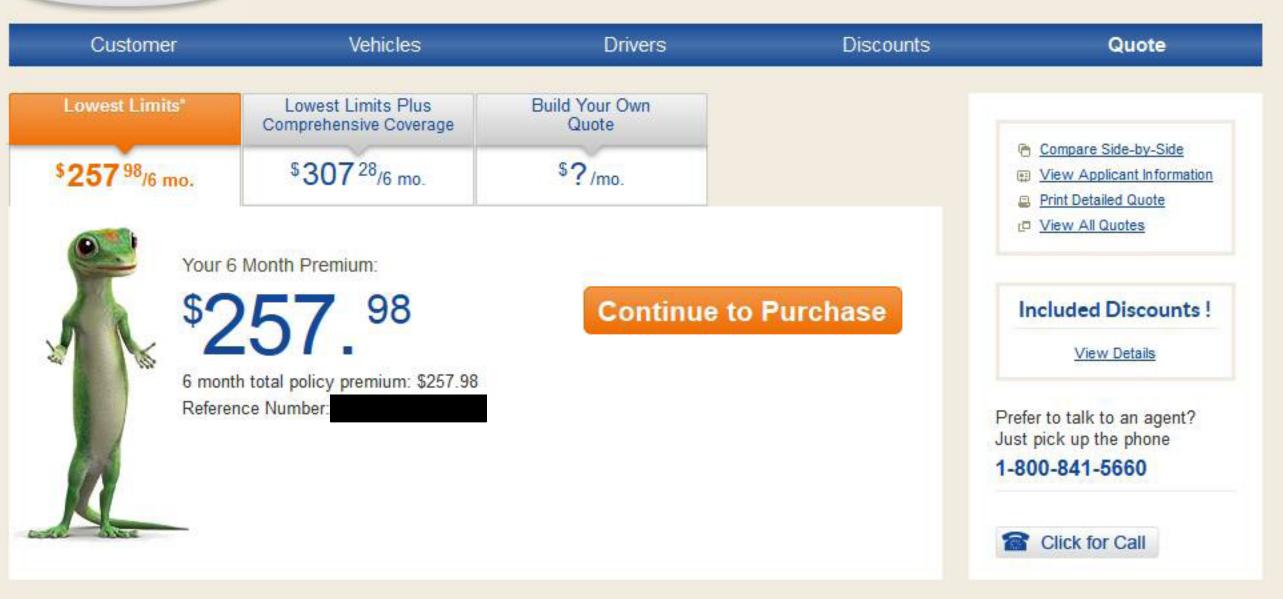


Customer Vehicles Discounts Quote Drivers Quote For: Ariel Erickson Referenc Talk to an Agent 1-800-841-5660 Discounts Answer the questions below to let us quote the lowest rate. Do you belong to any of these types of groups? Check all that apply: Click for Call Alumni Associations, Colleges and Universities Did you know GEICO could help you with motorcycle, homeowners, and renters insurance? When you carry more than one type of policy you may qualify for a multi-policy discount. Berkshire Hathaway Affiliates **Business and Professional Organizations Credit Unions** Fraternities, Sororities, and Honor Societies Organizations for Members of the Military Organizations for Education Other (RCI Timeshare owners, National Geographic subscribers, ACTIVE Network) Now, select your group from the list below: Not a member of any of these organizations Save Your Quote... Provide an email address to return to your quote. **Email Address** This email address will be used to send you emails about your quote. We respect customer privacy and do not sell email addresses. Contact number Go Paperless Paperless Bills via email: No thanks, maybe later Yes! No thanks, maybe later Paperless Policy online: Yes! By selecting "Yes" you are accepting our Terms & Conditions. One click away from your quote! Continue



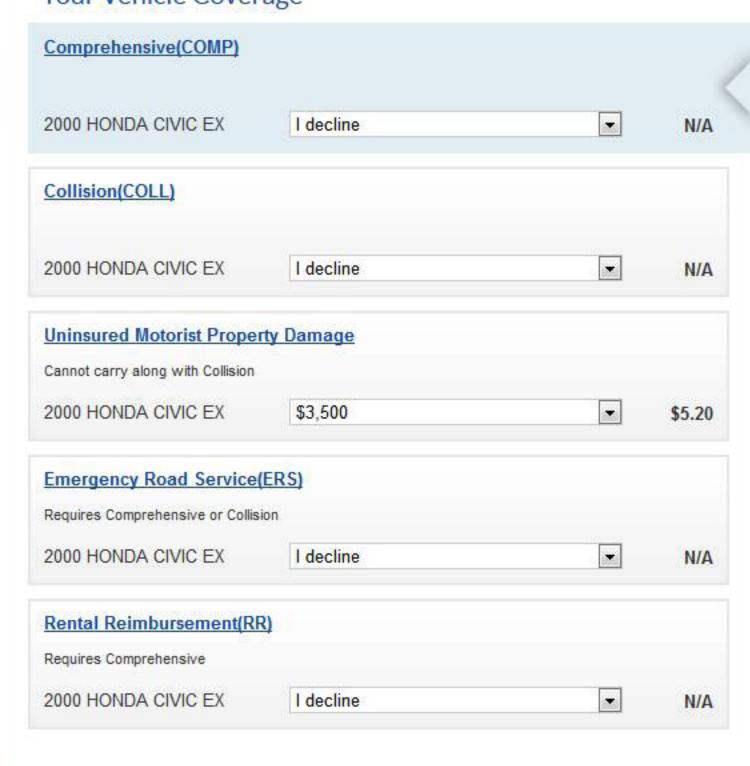




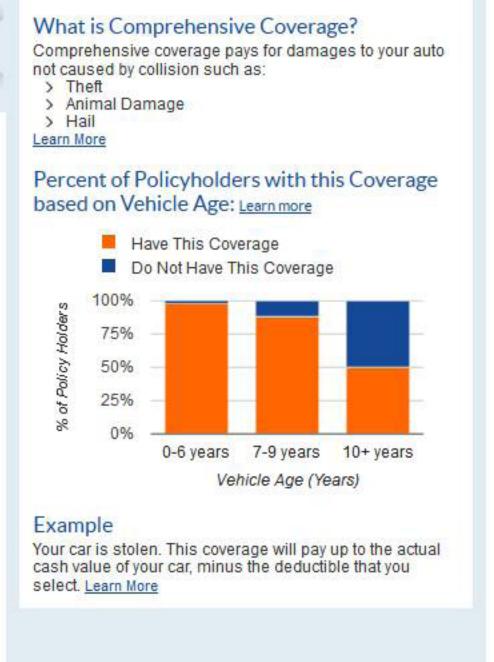




Your Vehicle Coverage



What is Full Coverage?



It's easy to buy this quote online! You can also call 1-800-841-5660 or visit a <u>local office</u>.

Continue to Purchase

*Important Messages

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*Assumptions were used in your quote.

Need to make changes to these assumptions? One of our professional agents will be happy to assist you.

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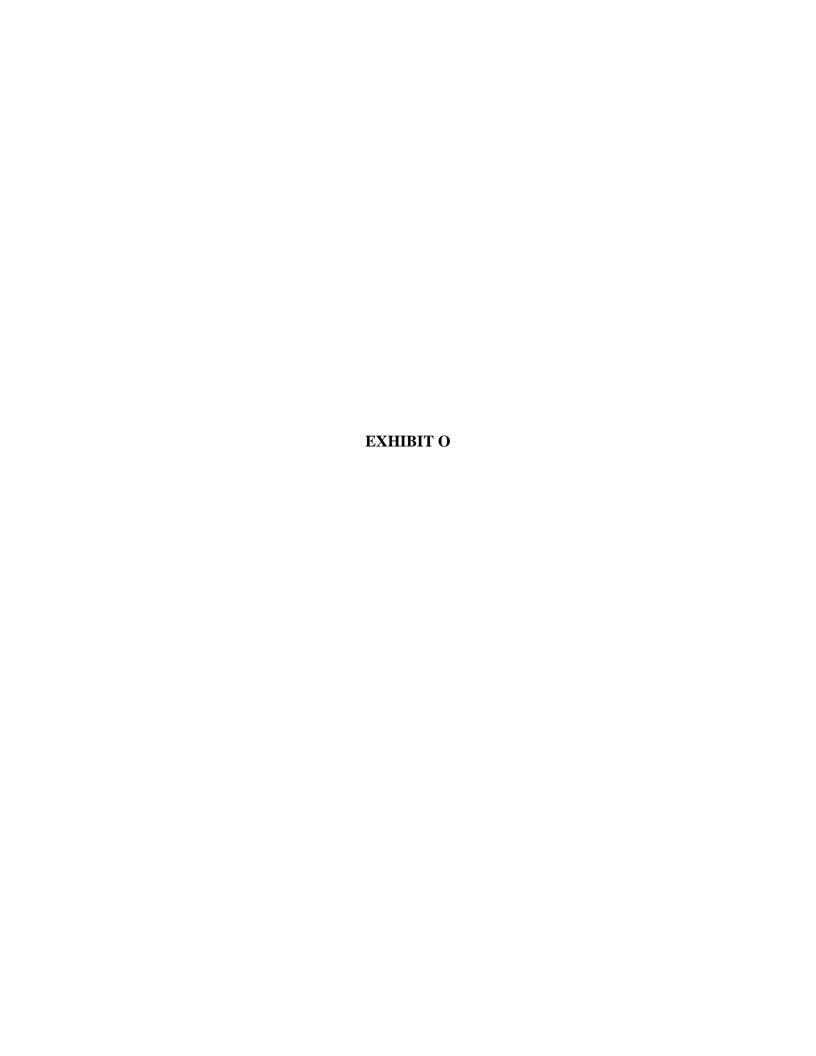
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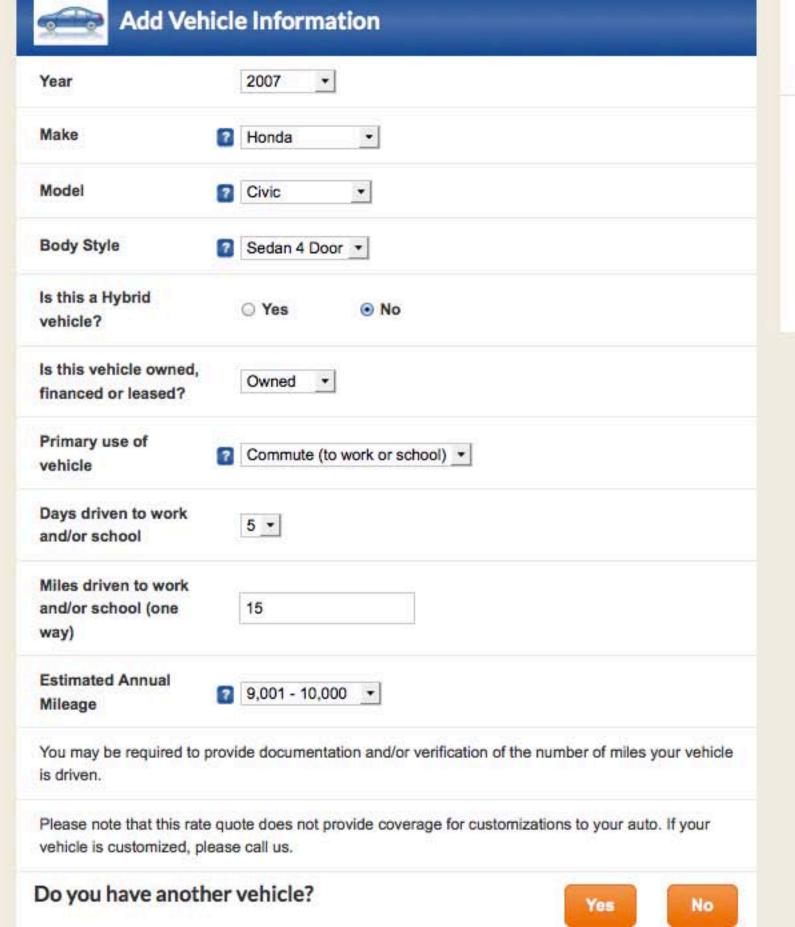
Coverage is subject to the terms, limits and conditions of the policy contract.







discount for homeowners, renters or condominium insurance? Quote What is considered "unmarried"? What if my address is FPO? What if I am in the process of Am I eligible for a multi-policy Associated with the Military? Call us at: 1-800-720-2198 Talk to an Agent 1-800-861-8380 moving? Discounts Continue We need to ask you for some personal information to provide you with an accurate quote. This **№** Drivers OYes 2 :000 Crystal Springs Rd Apt 2 02 / 02 / 1985 San Bruno, CA information is kept private and secure, and will not be sold. Vehicles Smythe Select 'Yes' if ANY of the following apply to you: Sandy 94066 > I need to insure more than one vehicle > I am married > I need to insure more than one driver **Customer Information** Customer Date of birth First name Last name City, State ZIP Code Address



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1-800-720-2198

Associated with the Military? Call us at:

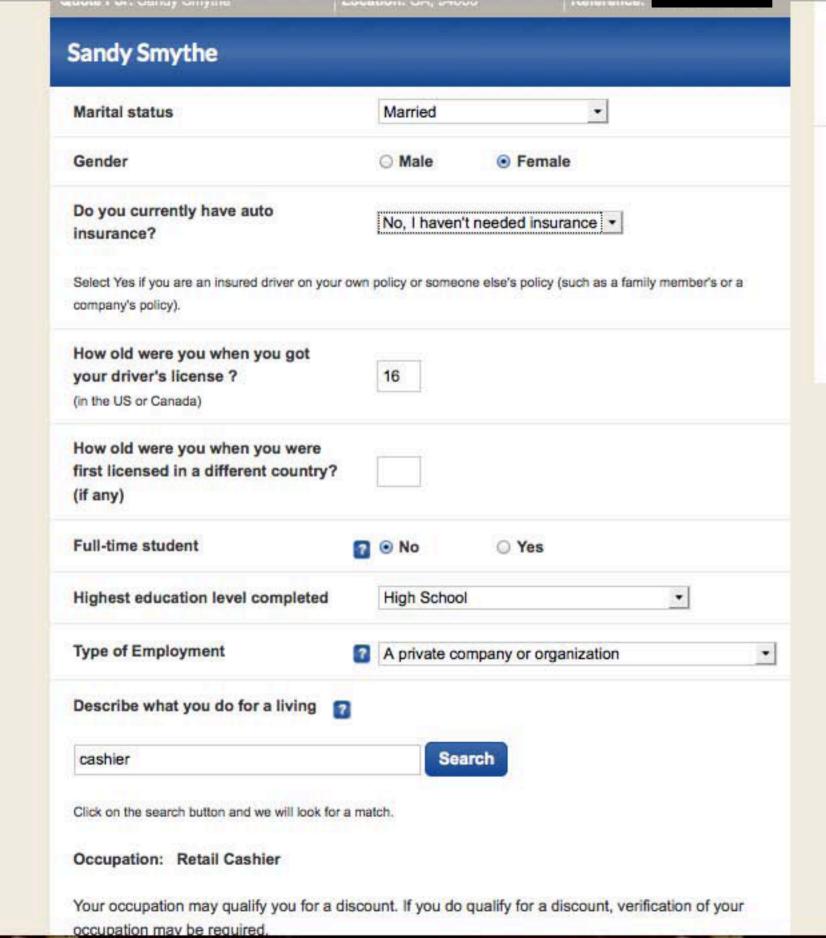


Click for Call

What if I have more than 9 vehicles?

What if I have customizations?

Not sure you have a Hybrid Vehicle?



Talk to an Agent 1-800-841-5660





Unsure who you should list as a driver?

Does my driving experience overseas meet GEICO's driving experience requirements?

First name Date of birth Sandy (Applicant) 02/02/1985 Change **Driver Information (Spouse)** Spouse First name Sam Spouse Last name Smythe Spouse Date of birth / 28 / 1984 Male O Female Gender uses my autos and has a valid driver's license . Driver status How old was this driver when they got their driver's license? 16 (in the US or Canada) How old was this driver when they were first licensed in a different country? (If any) Full-time student ☑ ● No O Yes Highest education level completed High School * Type of Employment A private company or organization Describe what Sam does for a living Search cashier Occupation: Retail Cashier Your occupation may qualify you for a discount. If you do qualify for a discount, verification of your occupation may be required.





requirements?



Vehicles **Drivers** Discounts Customer Quote Quote For: Sandy Smythe Location: CA, 94066 Reference: Talk to an Agent 1-800-841-5660 Percentage of Use What percentage does each driver operate each vehicle? **Driver Name** 2007 HONDA CIVIC Click for Call 90% -Sandy Smythe Sam Smythe 10% -Total Usage 100% Total Usage for each vehicle must equal 100% Continue

Save & Resume Later

Questions or problems? Click here or call us anytime at 1-800-841-5660.

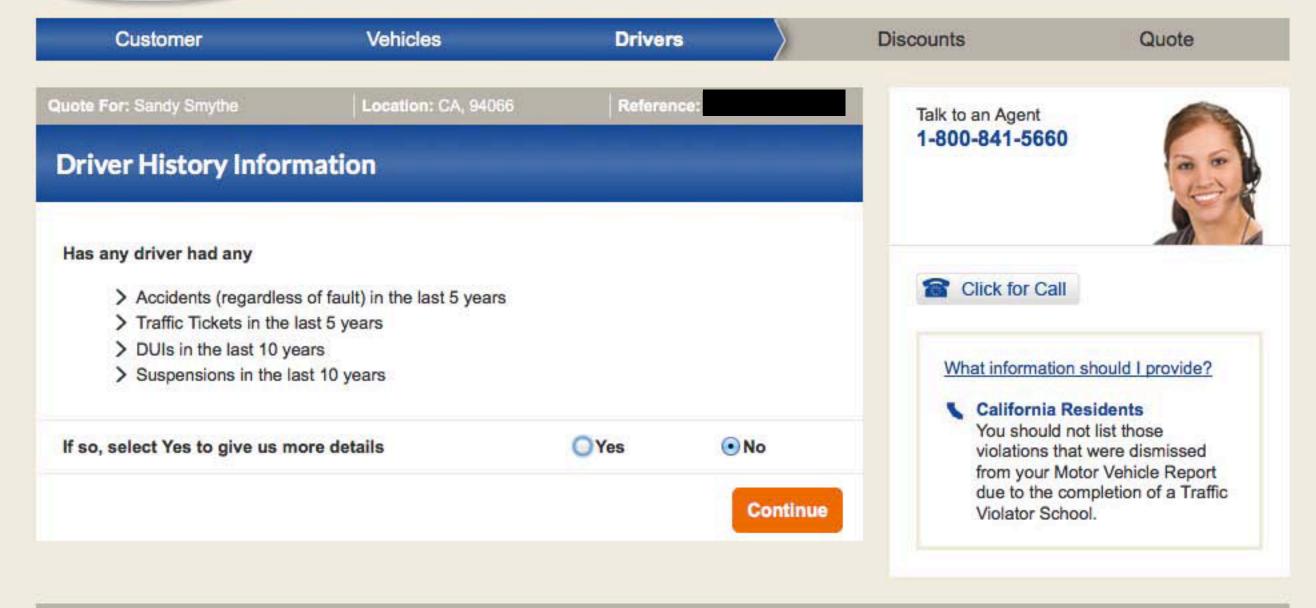
Your reference number is:

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Save & Resume Later

Questions or problems? Click here or call us anytime at 1-800-841-5660.

Your reference number is: 1

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GEICO.

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Discounts

Answer the questions below to let us quote the lowest rate.

Do you or your spouse belong to any of these types of groups? Check all that apply:

- Alumni Associations, Colleges and Universities
- Berkshire Hathaway Affiliates
- **Business and Professional Organizations**
- Credit Unions
- Fraternities, Sororities, and Honor Societies
- Organizations for Members of the Military
- Organizations for Education
- Other (RCI Timeshare owners, National Geographic subscribers, ACTIVE Network)

Now, select your group from the list below:

Not a member of any of these organizations

Save Your Quote...

Provide an email address to return to your quote.

Email Address



This email address will be used to send you emails about your quote.

We respect customer privacy and do not sell email addresses.

Talk to an Agent 1-800-841-5660

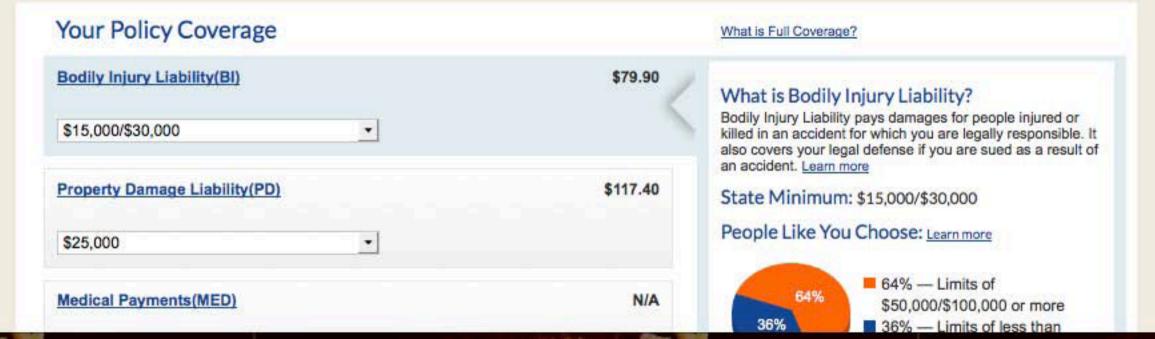


Click for Call

Did you know GEICO could help you with motorcycle, homeowners, and renters insurance? When you carry more than one type of policy you may qualify for a multi-policy discount.







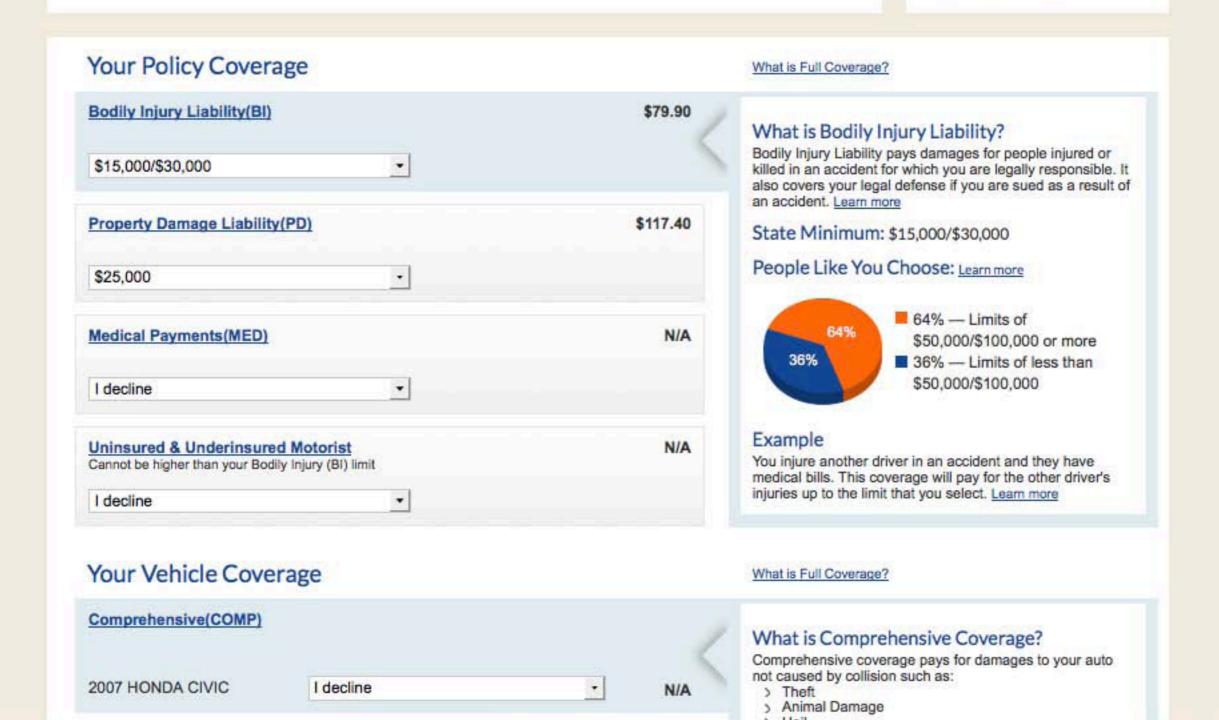


plus 5 monthly payments 6 month total policy premium: \$198.18 View Details

Prefer to talk to an agent? Just pick up the phone

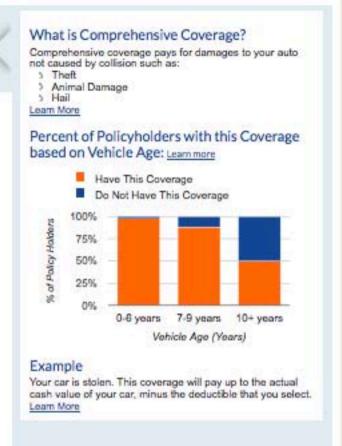
1-800-841-5660





Your Vehicle Coverage Comprehensive(COMP) 2007 HONDA CIVIC I decline . N/A Collision(COLL) 2007 HONDA CIVIC I decline N/A Uninsured Motorist Property Damage Cannot carry along with Collision 2007 HONDA CIVIC 1 decline N/A Emergency Road Service(ERS) Requires Comprehensive or Collision 2007 HONDA CIVIC I decline N/A Rental Reimbursement(RR)

What is Full Coverage?



It's easy to buy this quote online!

Requires Comprehensive 2007 HONDA CIVIC

You can also call 1-800-841-5660 or visit a local office.

Continue to Purchase

*Important Messages

We rely on your accurate statements when we provide you with a quote. However, we will verify your information through motor vehicle and claims reports if you decide to purchase a policy from GEICO General Insurance Company.

N/A

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I decline

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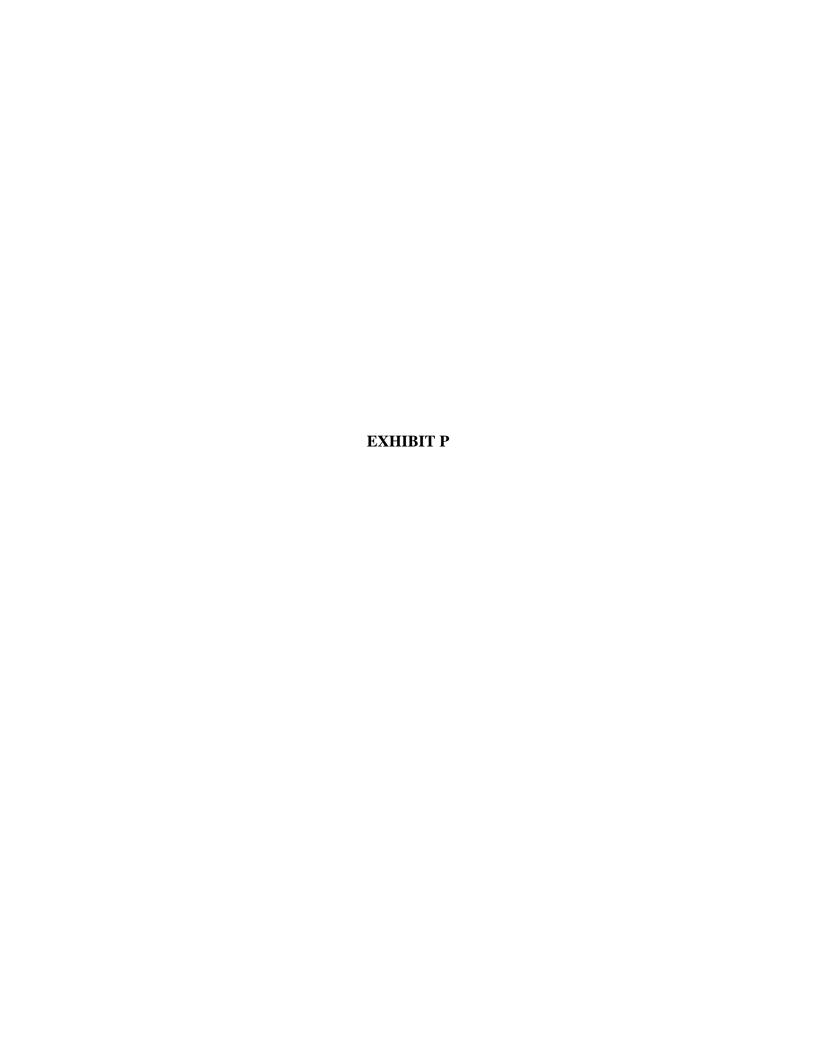
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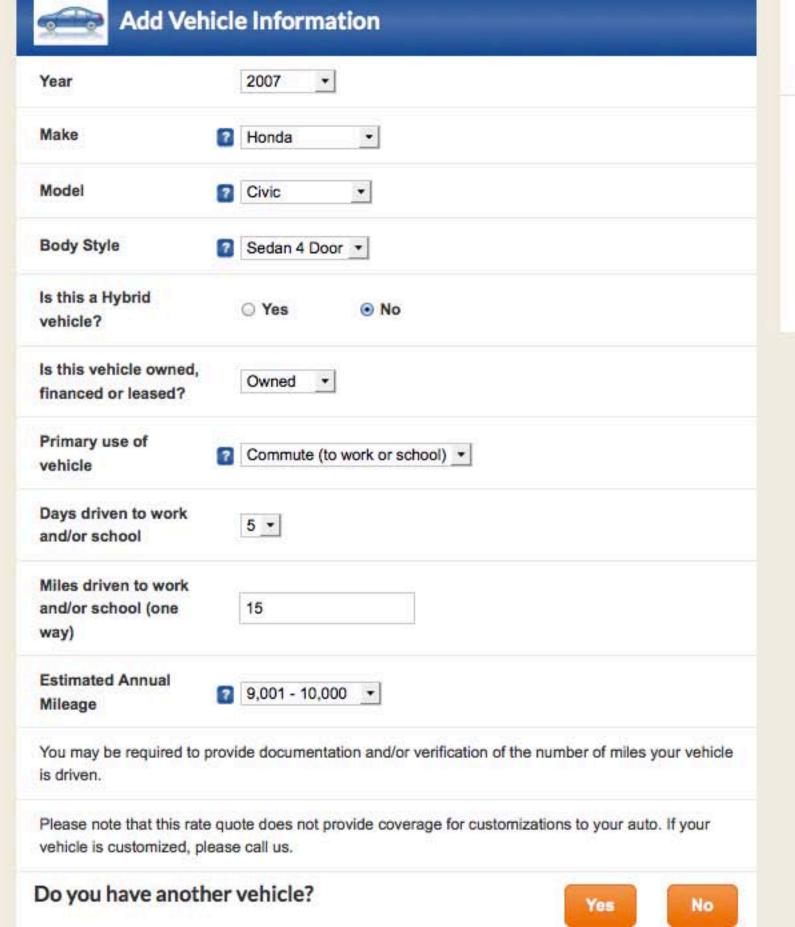
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discount for homeowners, renters or condominium insurance? Quote What is considered "unmarried"? What if my address is FPO? What if I am in the process of Am I eligible for a multi-policy Associated with the Military? Call us at: 1-800-720-2198 Talk to an Agent 1-800-861-8380 moving? Discounts Continue We need to ask you for some personal information to provide you with an accurate quote. This **№** Drivers OYes 2 :000 Crystal Springs Rd Apt 2 02 / 02 / 1985 San Bruno, CA information is kept private and secure, and will not be sold. Vehicles Smythe Select 'Yes' if ANY of the following apply to you: Sandy 94066 > I need to insure more than one vehicle > I am married > I need to insure more than one driver **Customer Information** Customer Date of birth First name Last name City, State ZIP Code Address



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1-800-720-2198

Associated with the Military? Call us at:

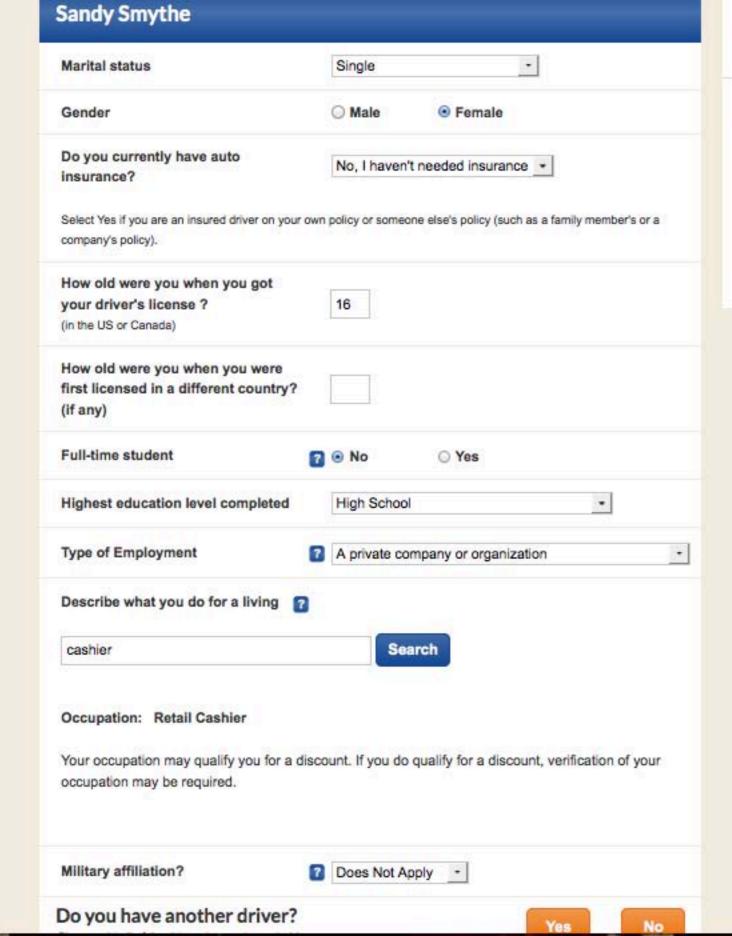


Click for Call

What if I have more than 9 vehicles?

What if I have customizations?

Not sure you have a Hybrid Vehicle?



Associated with the Military? Call us at: 1-800-720-2198

Click for Call





Does my driving experience overseas meet GEICO's driving experience requirements?



due to the completion of a Traffic Violator School. violations that were dismissed from your Motor Vehicle Report What information should I provide? Quote You should not list those California Residents Talk to an Agent 1-800-841-5660 Discounts Continue **%** ⊙ Drivers O Yes Accidents (regardless of fault) in the last 5 years Vehicles Suspensions in the last 10 years Traffic Tickets in the last 5 years If so, select Yes to give us more details **Driver History Information** DUIs in the last 10 years Has any driver had any Customer



GEICO © 2000-2015 GEICO.

Discounts Answer the questions below to let us quote the lowest rate. Do you belong to any of these types of groups? Check all that apply: Alumni Associations, Colleges and Universities Berkshire Hathaway Affiliates **Business and Professional Organizations** Credit Unions Fraternities, Sororities, and Honor Societies Organizations for Members of the Military Organizations for Education Other (RCI Timeshare owners, National Geographic subscribers, ACTIVE Network) Now, select your group from the list below: Not a member of any of these organizations + Save Your Quote... Provide an email address to return to your quote. Email Address This email address will be used to send you emails about your quote, We respect oustomer privacy and do not self email addresses. Contact number Go Paperless Paperless Bills via email: ○ Yes! No thanks, maybe later Paperless Policy online: Yes! No thanks, maybe later By selecting "Yes" you are accepting our Terms & Conditions.

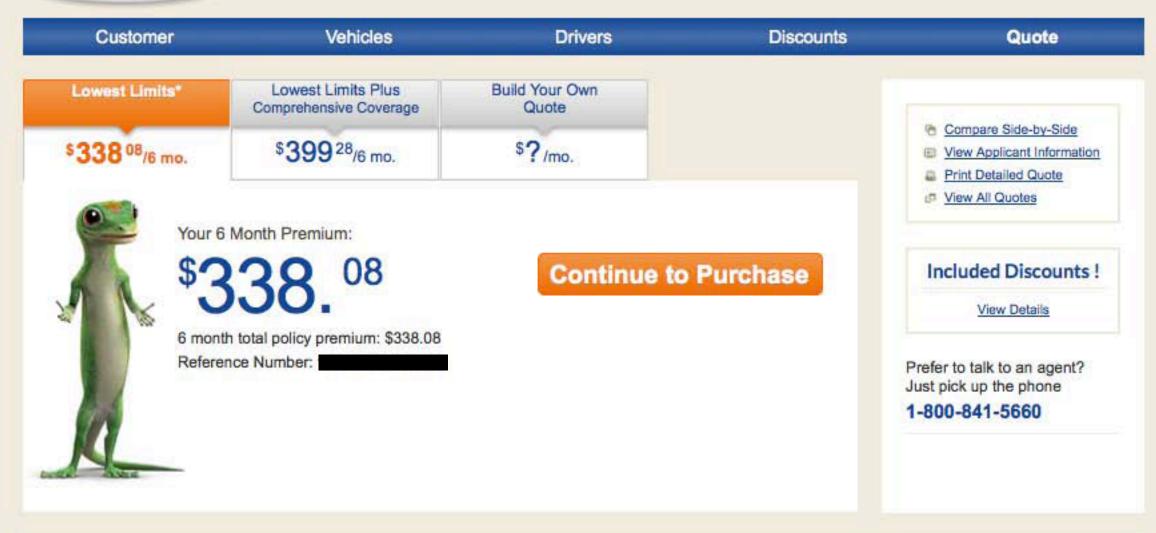
One click away from your quote!

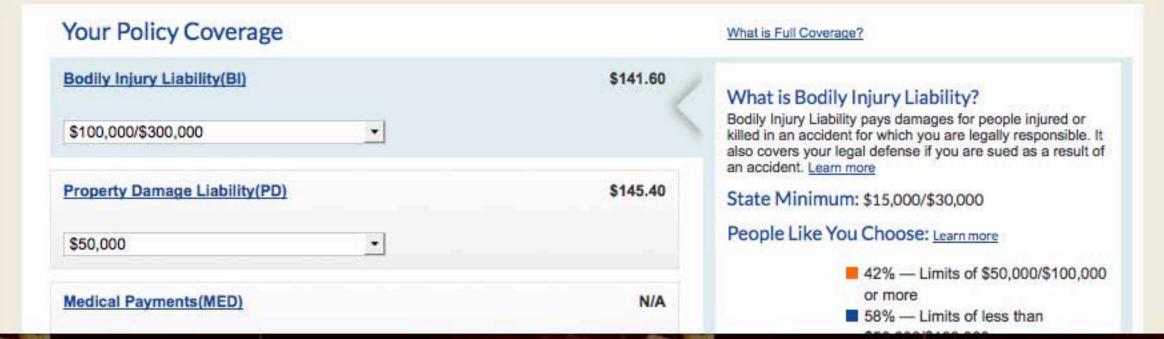


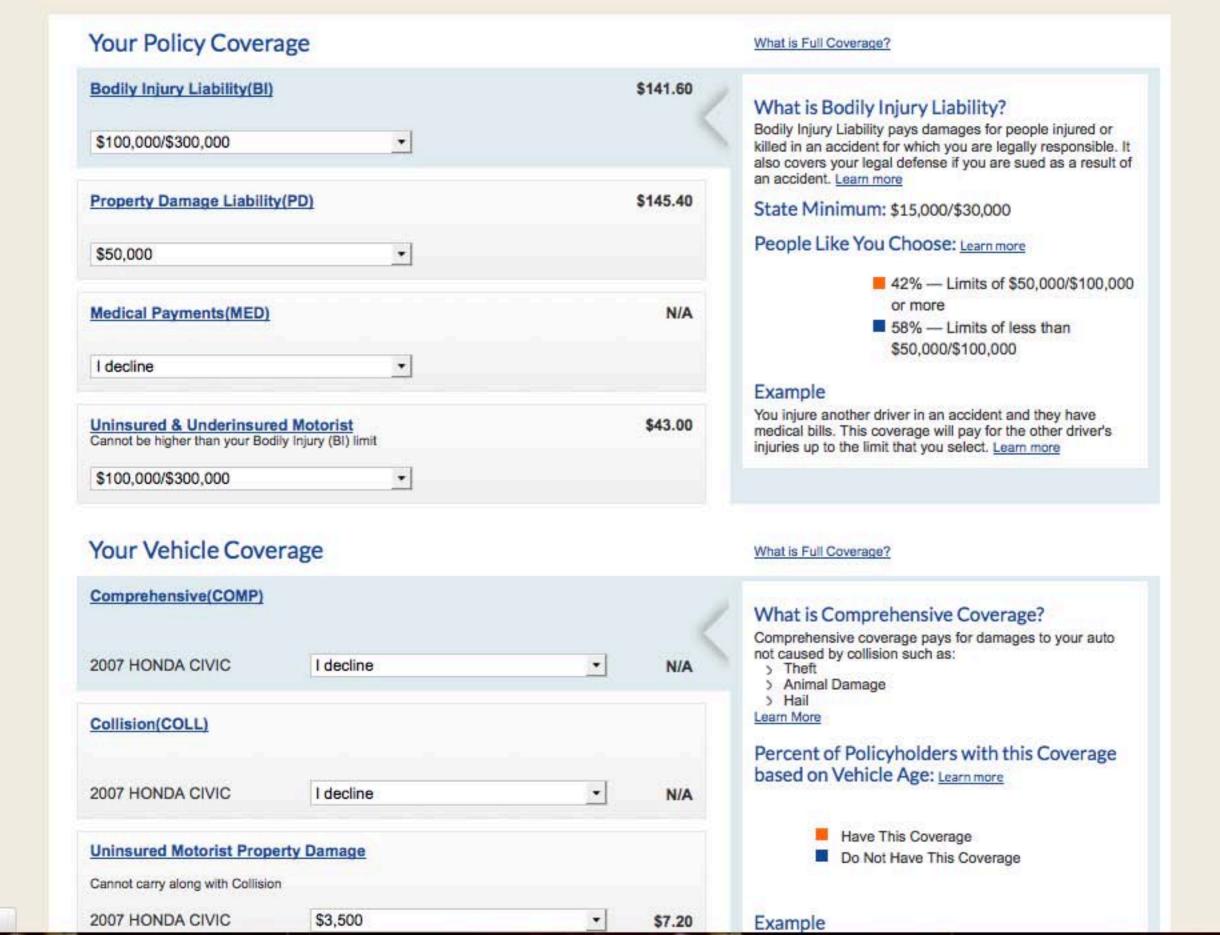
Click for Call

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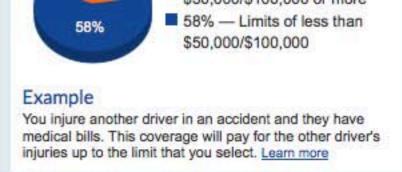






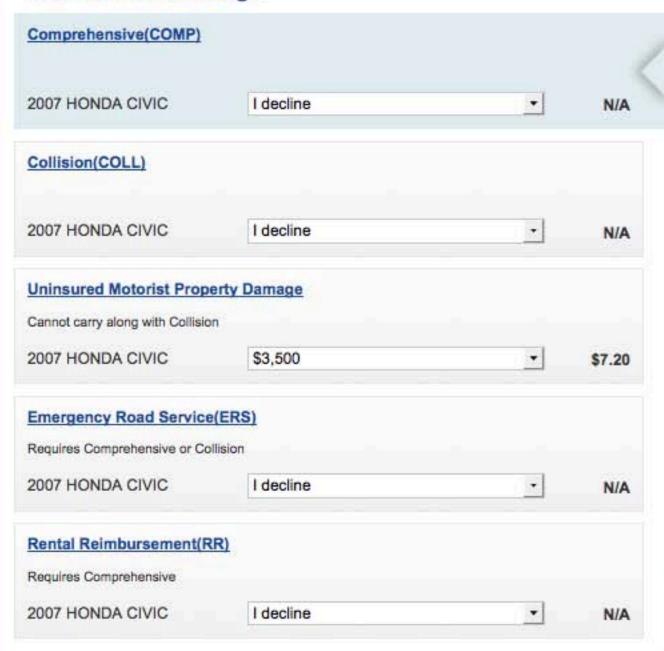




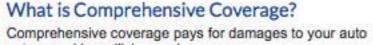


Your Vehicle Coverage

F1 92 F2 6 5



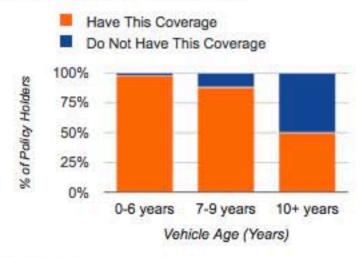
What is Full Coverage?



- not caused by collision such as:) Theft
- > Animal Damage
-) Hail

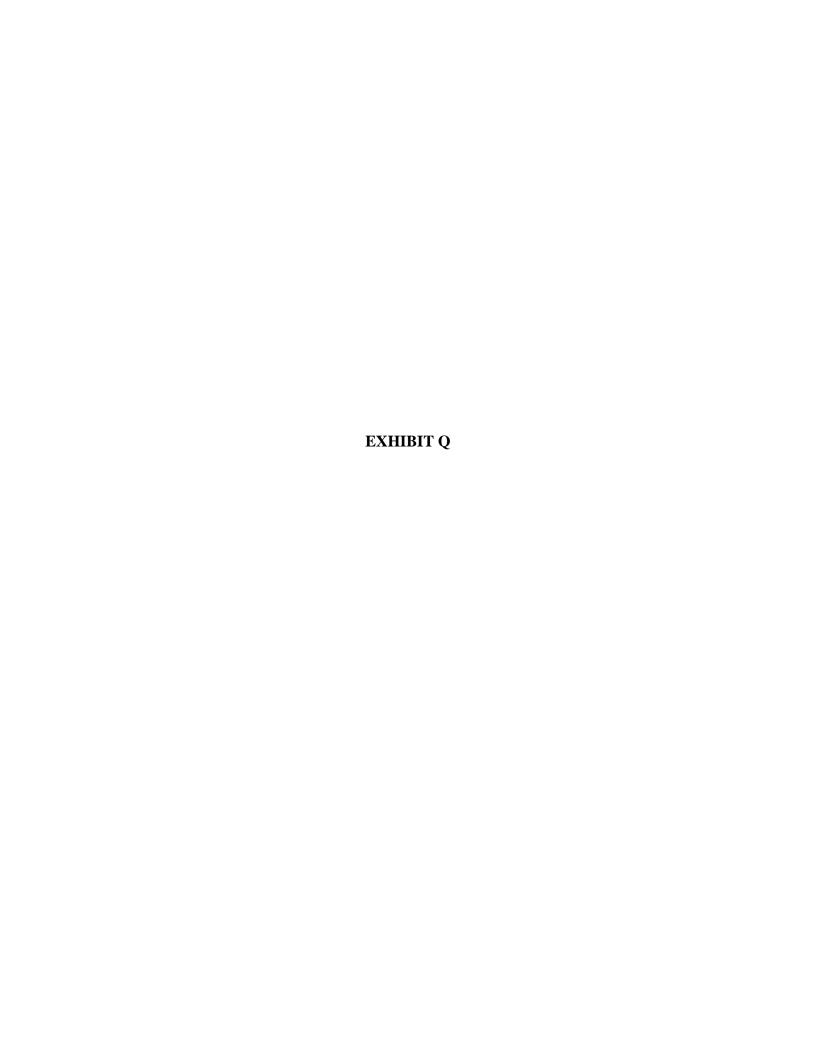
Learn More

Percent of Policyholders with this Coverage based on Vehicle Age: Learn more



Example

Your car is stolen. This coverage will pay up to the actual cash value of your car, minus the deductible that you select. Learn More





Customer Vehicles Drivers



You're in good company! 161 of your San Francisco neighbors purchased a GEICO policy last month.

Quote

Discounts

Customer Information

We need to ask you for some personal information to provide you with an accurate quote. This information is kept <u>private</u> and <u>secure</u>, and will not be sold.

Associated with the Military? Call us at: 1-800-720-2198

Talk to an Agent 1-800-861-8380

Calvin
First name

Last name Hobbes Address 7746 43rd Ave Apt

ZIP Code 94116

Am I eligible for a multi-policy discount for homeowners, renters or

condominium insurance?

What if my address is FPO?

What if I am in the process of

moving?

What is considered "unmarried"?

City, State San Francisco, CA
Date of birth 2 / 1984

12 / 1984

Select 'Yes' if ANY of the following apply to you:

> I need to insure more than one vehicle

I need to insure more than one driver

ON O

○ Yes

> I am married

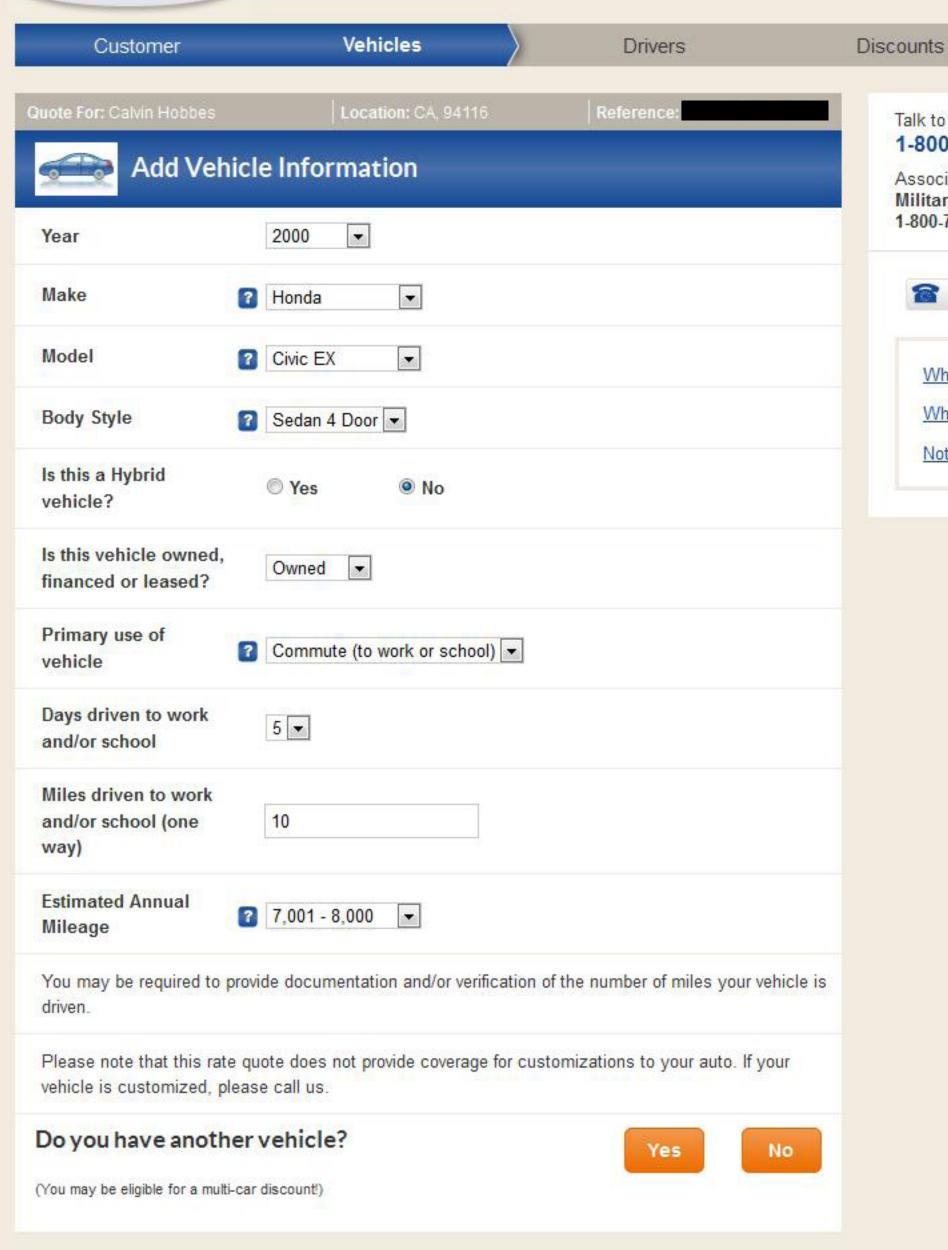
Continue

or problems? Click here or call us anytime at 1-800-861-8380.









Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198

Click for Call



Quote

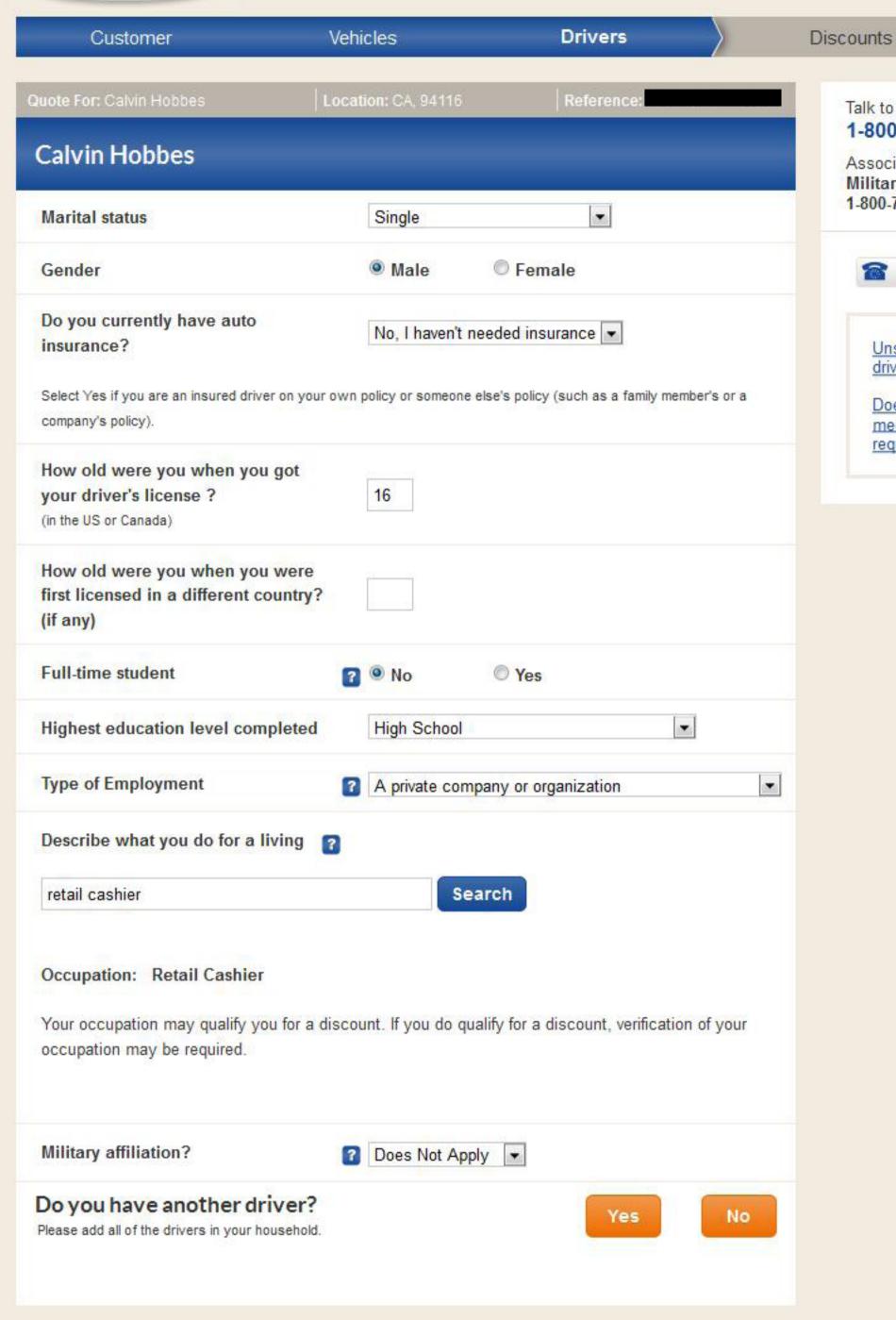
What if I have more than 9 vehicles?
What if I have customizations?

Not sure you have a Hybrid Vehicle?









Talk to an Agent
1-800-841-5660
Associated with the
Military? Call us at:
1-800-720-2198

Click for Call

Unsure who you should list as a driver?

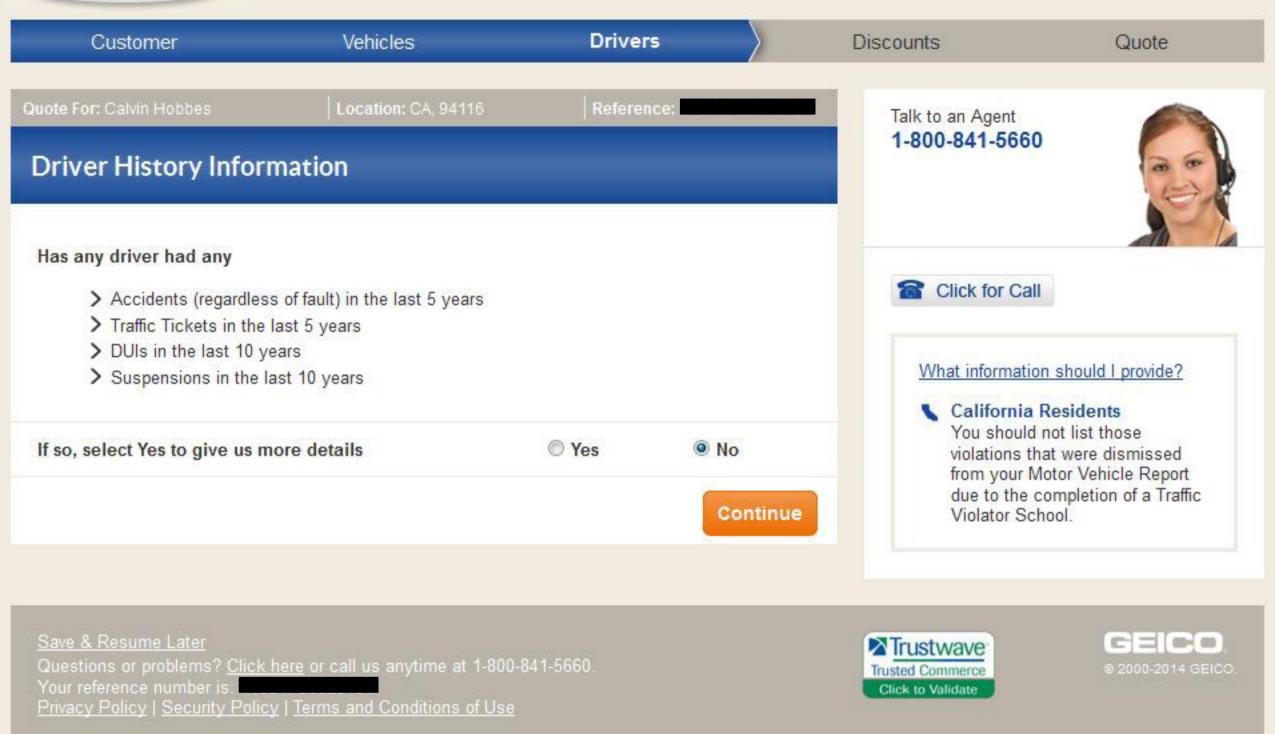
Does my driving experience overseas meet GEICO's driving experience

requirements?

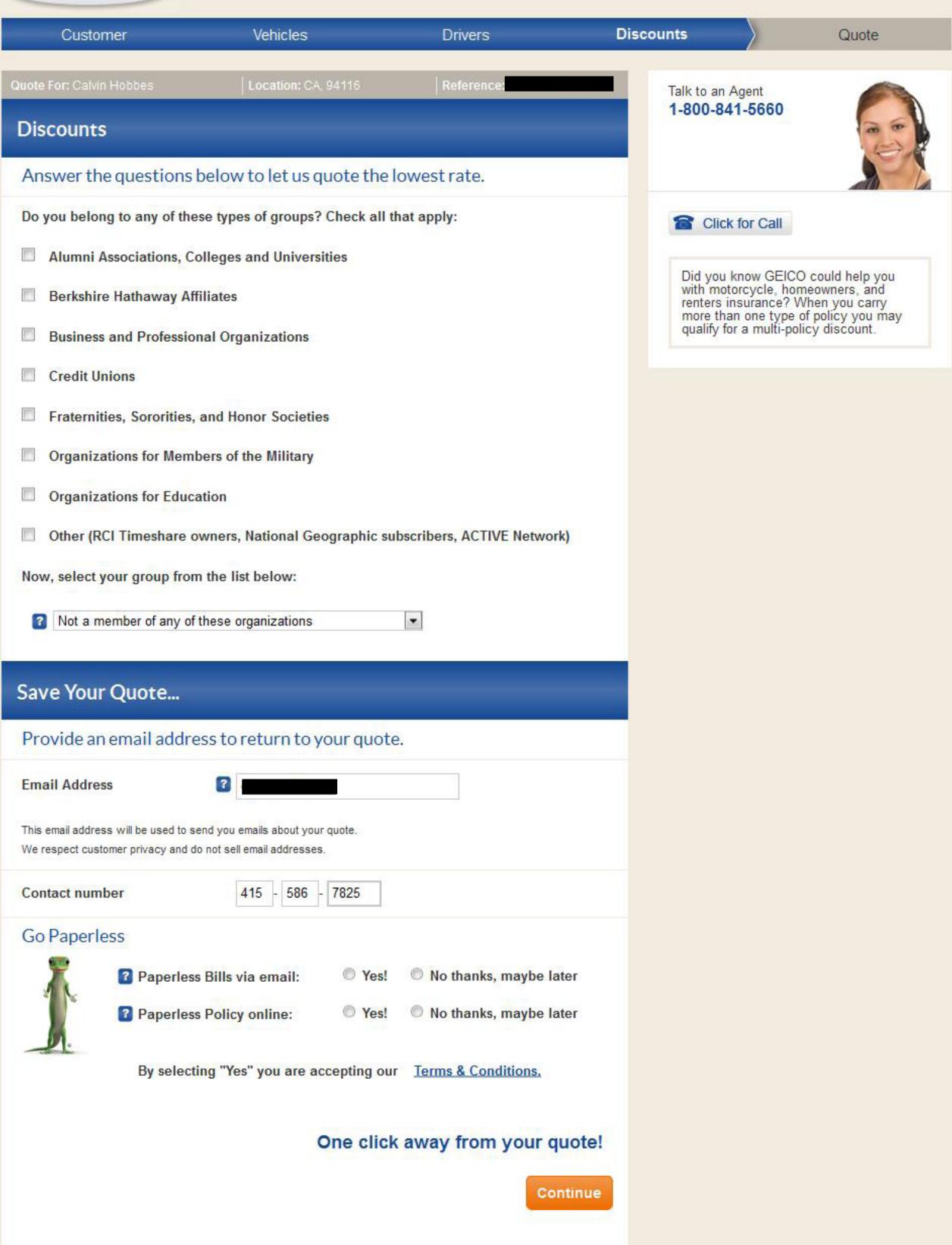
Quote







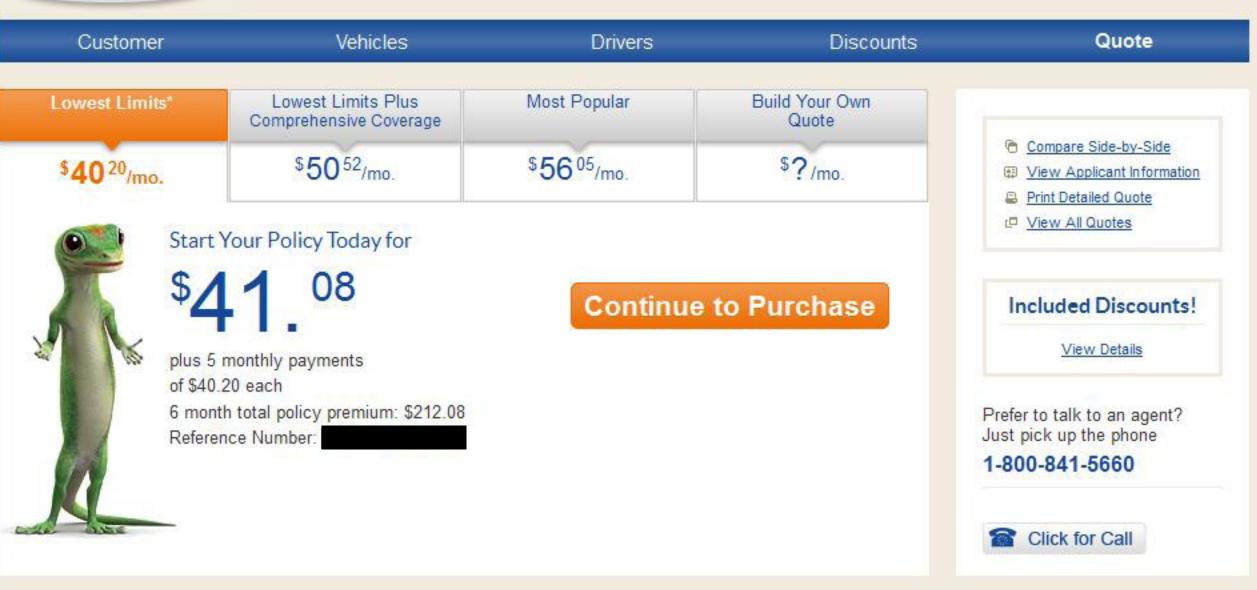


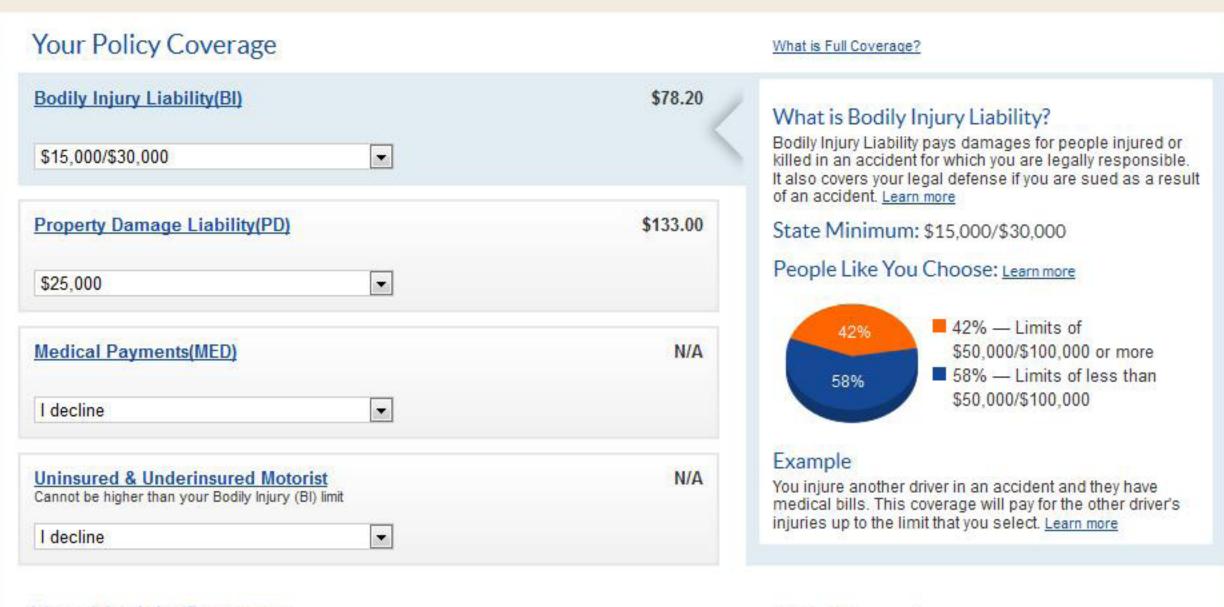




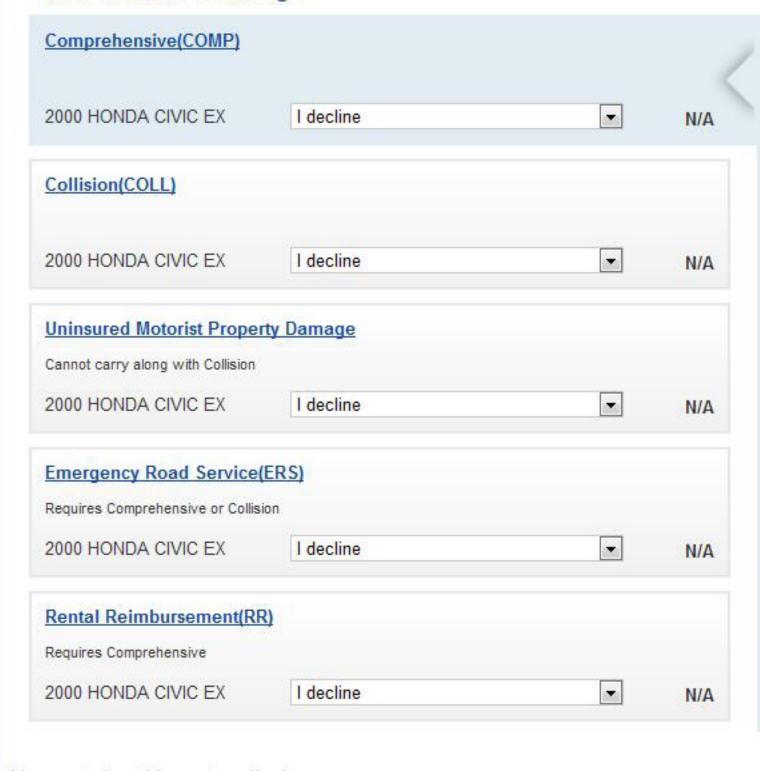








Your Vehicle Coverage



What is Full Coverage?

What is Comprehensive Coverage? Comprehensive coverage pays for damages to your auto not caused by collision such as: > Theft > Animal Damage > Hail Learn More Percent of Policyholders with this Coverage based on Vehicle Age: Learn more Have This Coverage Do Not Have This Coverage 100% of Policy Holders 75% 50% 25% 0% 0-6 years 7-9 years 10+ years Vehicle Age (Years) Example Your car is stolen. This coverage will pay up to the actual cash value of your car, minus the deductible that you select. Learn More

It's easy to buy this quote online! You can also call 1-800-841-5660 or visit a <u>local office.</u>

Continue to Purchase

*Important Messages

We rely on your accurate statements when we provide you with a quote. However, we will verify your information through motor vehicle and claims reports if you decide to purchase a policy from GEICO General Insurance Company.

*Assumptions were used in your quote.

Need to make changes to these assumptions? One of our professional agents will be happy to assist you.

1) You have not had a theft or vandalism.

Please note that this rate quote does not provide coverage for customizations to your auto. If your vehicle is customized, please call us.

GEICO reserves the right to not insure vehicles that were totaled, reconstructed, or significantly damaged due to natural disasters (flood, fire, hail).

If you pay your premium in installments, each payment includes an installment fee.

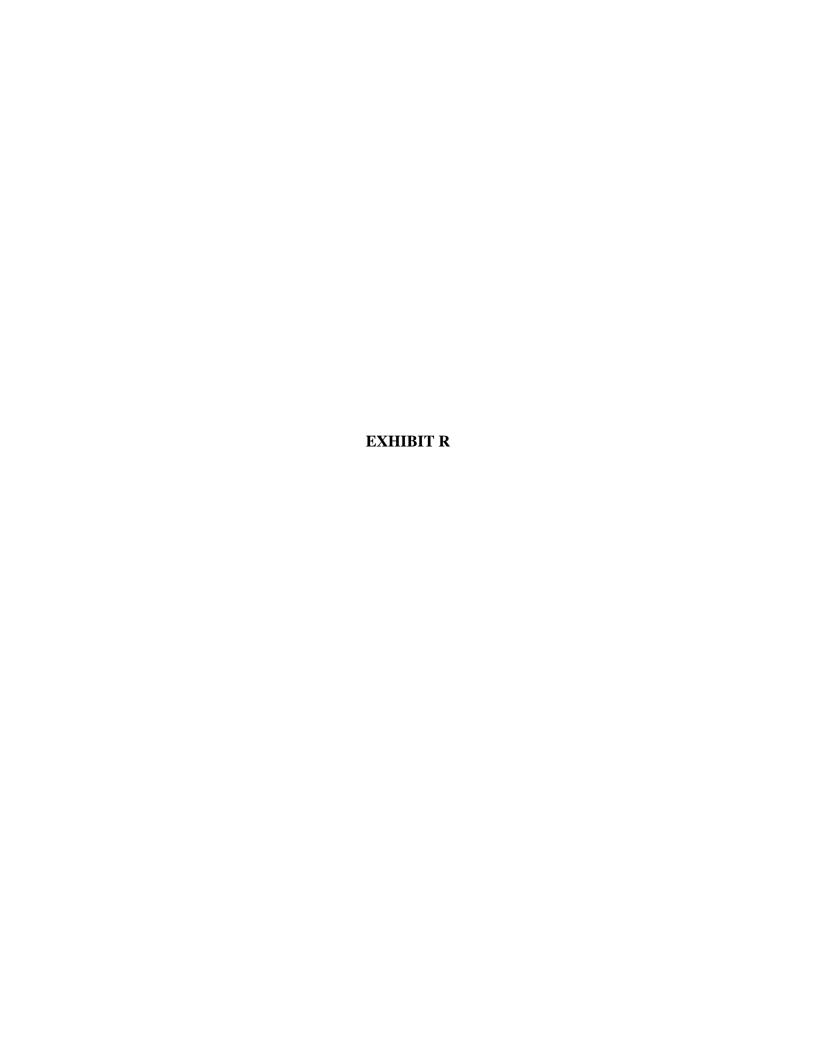
The "Similar Coverage" package quote is based solely on your current bodily injury coverage limits. It may not match your other current coverages, nor your current deductibles. The "Lowest Limits" package quote includes the lowest bodily injury limits that we offer in your state, but may not represent the lowest limits available for other coverages, nor the lowest possible deductibles.

Additional limits may be available. If you need a quote for a limit not shown, please call us.

Collision deductibles that include the Uninsured Motorist deductible waiver are more expensive than the Collision deductibles that do not include the waiver.

Coverage is subject to the terms, limits and conditions of the policy contract.







Customer Vehicles Drivers Discounts Quote

You're in good company! 161 of your San Francisco neighbors purchased a GEICO policy last month.

Continue We need to ask you for some personal information to provide you with an accurate quote. This ON O Apt O Yes 08 / 24 / 1984 San Francisco, CA information is kept private and secure, and will not be sold. 2740 43rd Ave Select Yes' if ANY of the following apply to you: Nolan 94116 > I need to insure more than one vehicle > I am married Jean I need to insure more than one driver Customer Information Date of birth First name Last name City, State ZIP Code Address

Am I eligible for a multi-policy discount for homeowners, renters or condominium insurance?

What is considered "unmarried"?

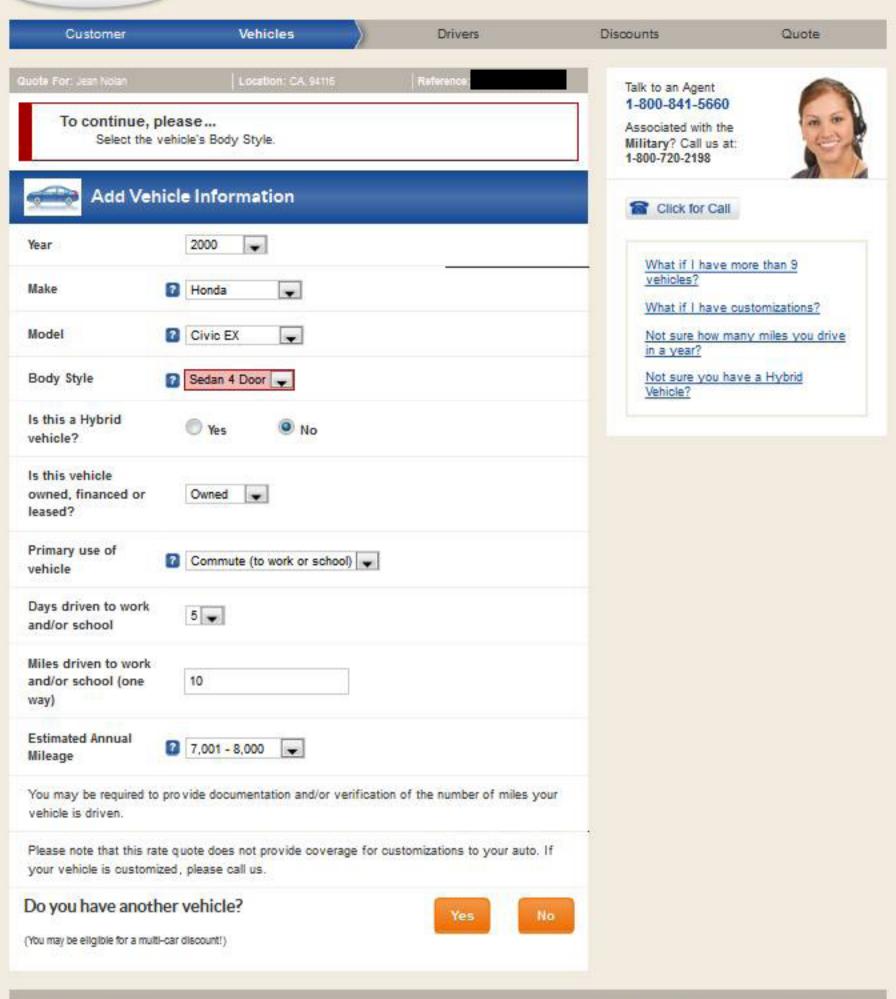
What if my address is FPO?

What if I am in the process of moving?

Associated with the Military? Call us at: 1-800-720-2198

Talk to an Agent 1-800-861-8380 | Variet Policy | Jerms and Conditions of Use | CEICCO | Control Commerce | Control Commerce | Control Contro



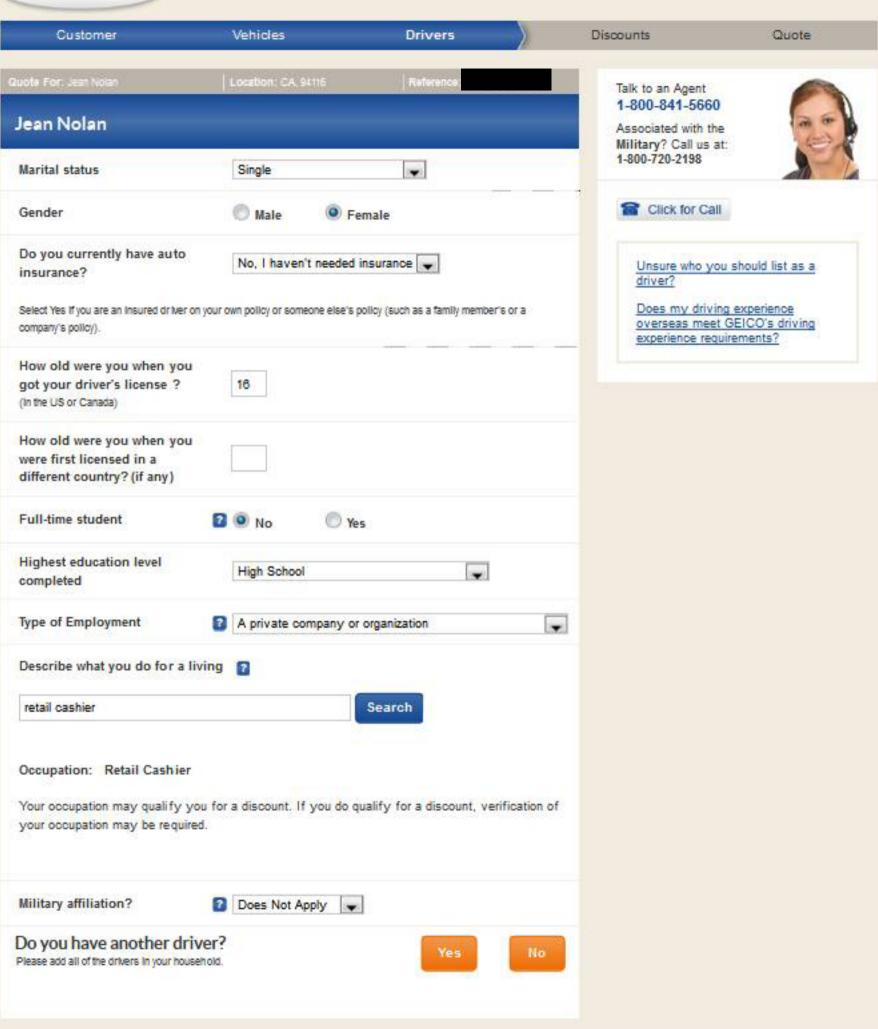


Save & Resume Later
Questions or problems? Click here or call us anytime at 1-500-841-5660.
Your reference number is
Privacy Policy I Security Policy I Terms and Conditions of Use





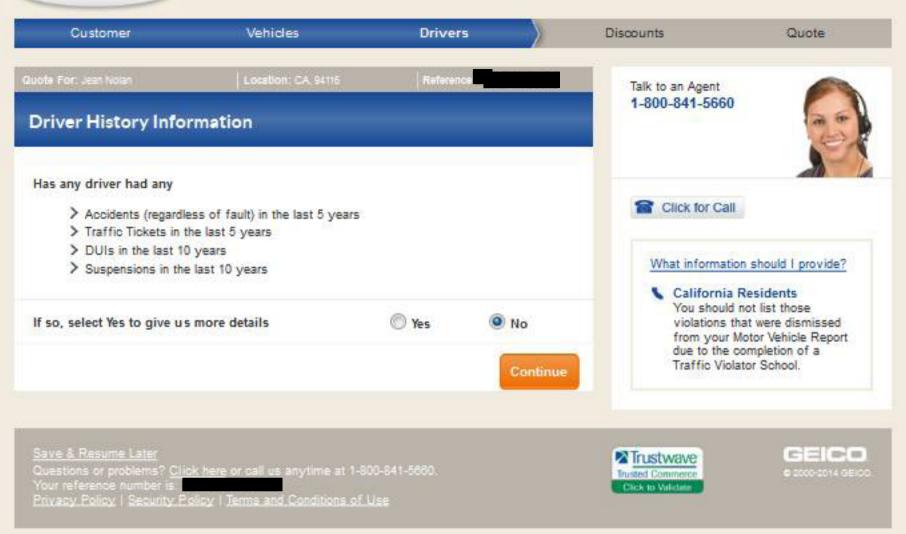




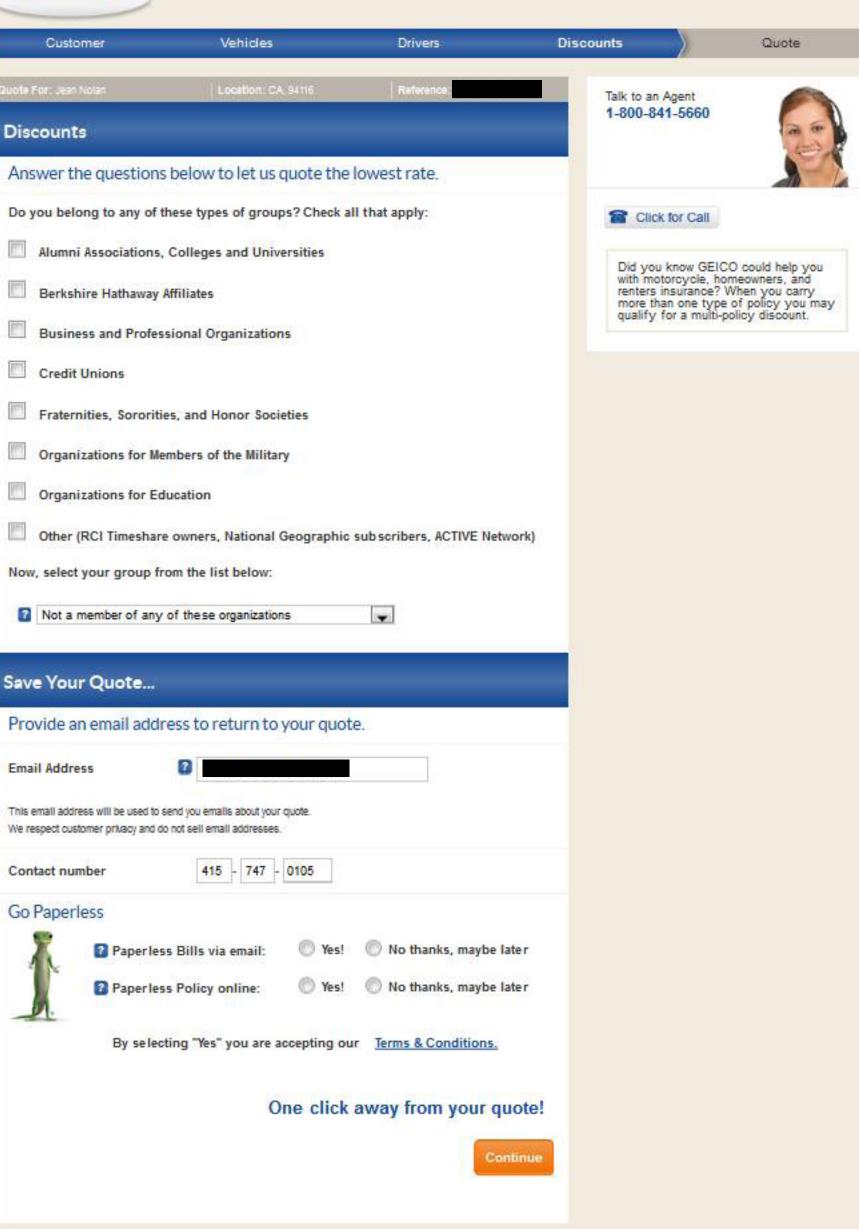








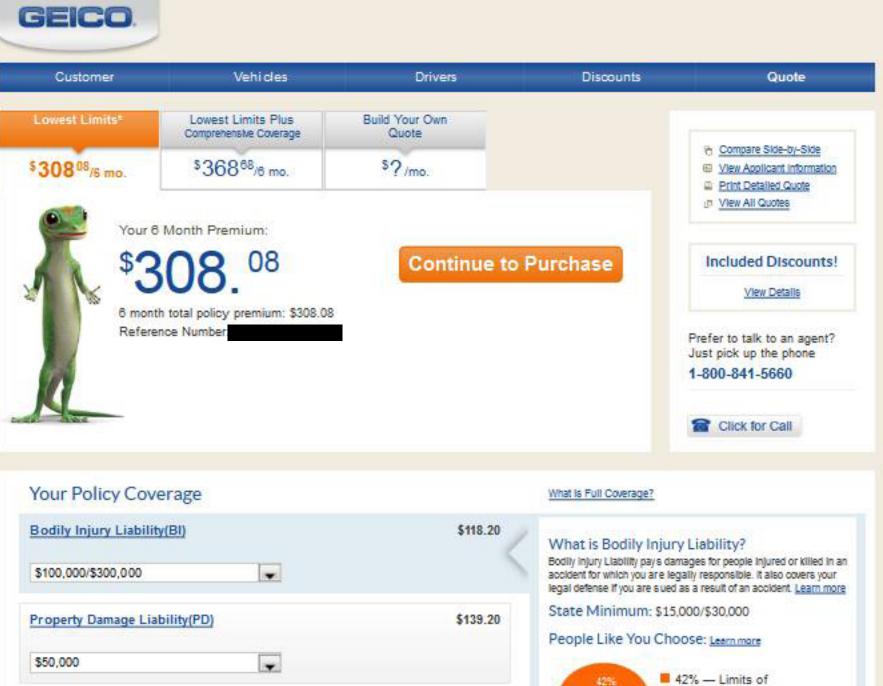












N/A

\$42.60

Uninsured & Underinsured Motorist Cannot be higher than your Bodily Injury (BI) limit

Medical Payments(MED)

\$100,000/\$300,000

I decline

Your Vehicle Coverage Comprehensive(COMP) N/A 2000 HONDA CIVIC EX I decline . > Theft > Animal Damage > Hall Learn More Collision(COLL) 2000 HONDA CIVIC EX I decline N/A -Uninsured Motorist Property Damage Cannot carry along with Collision 75% 50% 2000 HONDA CIVIC EX \$3,500 25% Emergency Road Service(ERS) Requires Comprehensive or Collision N/A 2000 HONDA CIVIC EX I decline Example Rental Reimbursement(RR) Requires Comprehensive 2000 HONDA CIVIC EX I decline * N/A

What is Full Coverage?

that you select. Learn more

Example

What is Comprehensive Coverage? Comprehensive coverage pays for damages to your auto not caused by collision such as: Percent of Policyholders with this Coverage based on Vehicle Age: Learn more Have This Coverage Do Not Have This Coverage 0-6 years 7-9 years 10+ years Vehicle Age (Years) Your car is stolen. This coverage will pay up to the actual cash value of your car, minus the deductible that you select. Learn More

\$50,000/\$100,000 or more

58% — Limits of less than \$50,000/\$100,000

You injure another driver in an accident and they have medical bills.

This coverage will pay for the other driver's injuries up to the limit

It's easy to buy this quote online! You can also call 1-800-841-5660 or visit a local office.

Continue to Purchase

*Important Messages

We rely on your accurate statements when we provide you with a quote. However, we will verify your information through motor vehicle and claims reports if you decide to purchase a policy from GEICO Indemnity Company.

"Assumptions were used in your quote.

Need to make changes to these assumptions? One of our professional agents will be happy to assist you. 1) You have not had a theft or vandalism.

Please note that this rate quote does not provide coverage for customizations to your auto. If your vehicle is customized, please call us.

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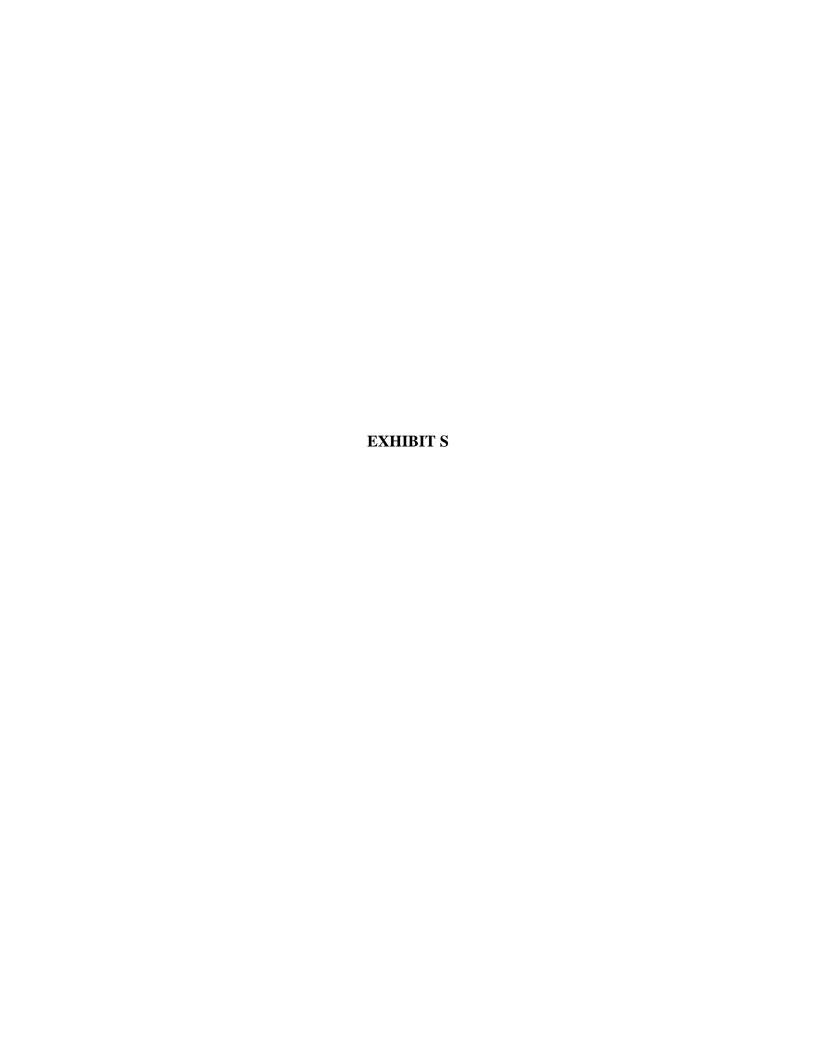
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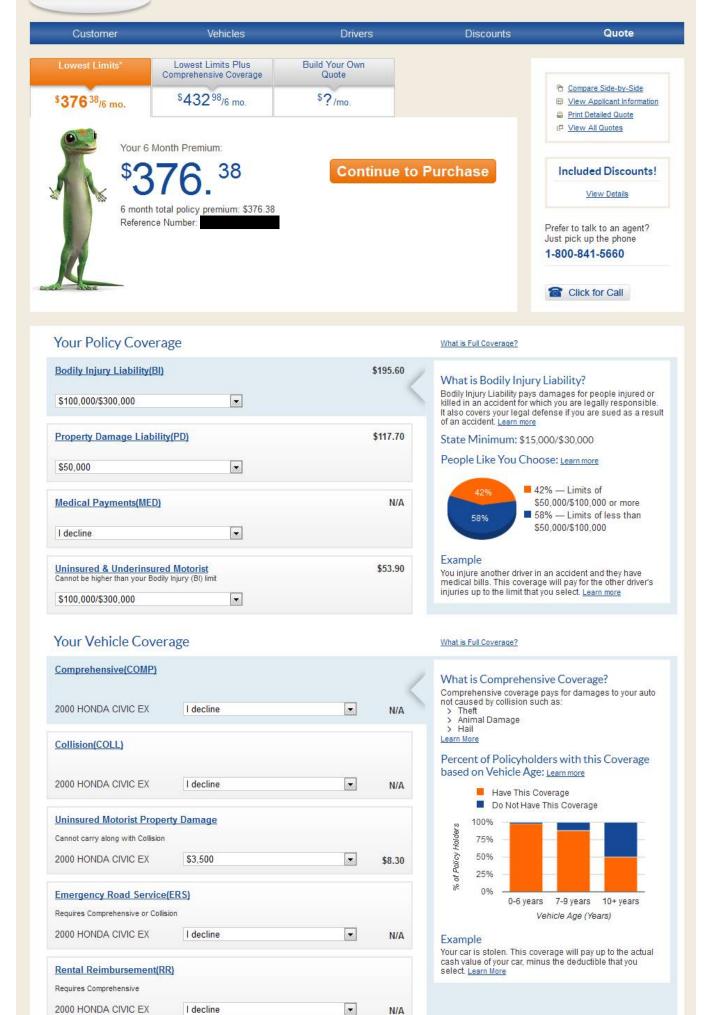
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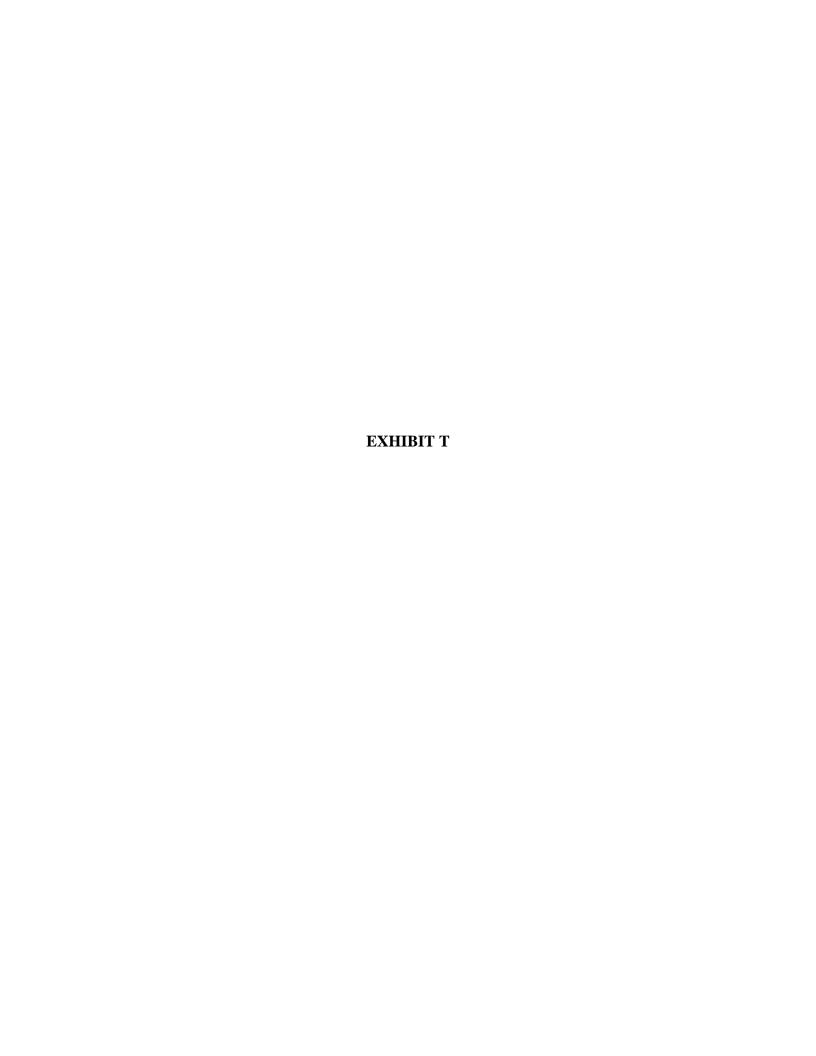
Coverage is subject to the terms, limits and conditions of the policy contract.

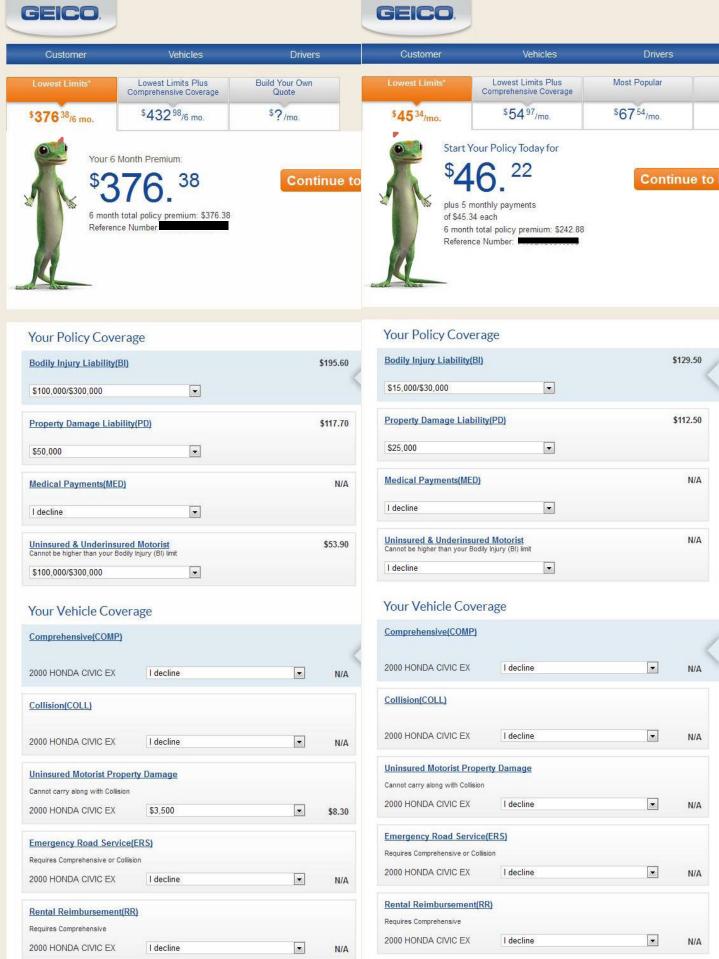












PROOF OF SERVICE [BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION, EMAIL TRANSMISSION AND/OR PERSONAL SERVICE]

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 February 12, 2015 between 8:30 and 9:30 AM, I caused service of true and correct copies of the document entitled

CONSUMER FEDERATION OF CALIFORNIA'S PETITION FOR FINDING OF NONCOMPLIANCE AND ORDER TO SHOW CAUSE, PETITION FOR HEARING, PETITION TO PARTICIPATE, PETITION TO INTERVENE, AND NOTICE OF INTENT TO SEEK INTERVENOR 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 February 12, 2015, at Sacramento, California.

Megan Varvais

1 SERVICE LIST 2 Person Served **Method of Service** 3 4 Hon. Dave Jones FAX 5 **Insurance Commissioner** U.S. MAIL 6 California Department of Insurance **OVERNIGHT MAIL** 300 Capitol Mall, Suite 1700 HAND DELIVERED 7 Sacramento, California 95814 X EMAIL Tel. No.: (916) 492-3500 8 Fax No.: (916) 445-5280 9 CommissionerJones@insurance.ca.gov Adam Cole FAX 10 General Counsel U.S. MAIL California Department of Insurance X OVERNIGHT MAIL 11 45 Fremont Street, 23rd Floor HAND DELIVERED 12 $X \subseteq EMAIL$ San Francisco, CA 94105 Tel. No.: (415) 538-4375 13 Fax No.: (415) 904-5889 adam.cole@insurance.ca.gov 14 Edward Wu FAX 15 Public Advisor U.S. MAIL Office of the Public Advisor **OVERNIGHT MAIL** 16 California Department of Insurance HAND DELIVERED 300 South Spring Street, 12th Floor X __ EMAIL 17 Los Angeles, CA 90013 18 Tel. No.: (213) 346-6635 Fax No.: (213) 897-9241 19 edward.wu@insurance.ca.gov Nancy Flores FAX 20 c/o CT Corporation System U.S. MAIL 21 818 West Seventh Street **OVERNIGHT MAIL** Los Angeles, CA 90017 HAND DELIVERED 22 For: GEICO GENERAL INSURANCE **EMAIL** COMPANY 23

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