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480 Washington Blvd. 29<sup>th</sup> Floor  
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Attn: Legal Department

Continental Casualty Company  
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Attn: Thomas Corcoran

Hartford Financial Svcs. Group  
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Attn: Fraud Dept./Investor Rel.

State Farm Mutual Automobile Ins.  
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Attn: Edward Rust, Jr.

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Shareholder Services  
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Dresher, PA 19025  
Attn: Lisa Hayer

**COPY TO:** Mike Kreidler, Insurance Commissioner  
Michael G. Watson, Chief Deputy Insurance Commissioner  
Charles Brown, Senior Staff Attorney, Legal Affairs Division  
Office of the Insurance Commissioner  
PO Box 40255  
Olympia, WA 98504-0255

Rose Howell (Howell) filed a Demand for Hearing received via email on April 24, 2012. In this Demand, Howell demands that the Commissioner consider her private claims against Safeco Insurance Company of Illinois and others (Howell lists ten companies as defendants in the Demand's caption, and in previous filings and communications has also referred to fraudulent acts of her relatives, including her sister) arising from injuries she alleges were caused to her thirteen years ago by a Safeco of Illinois insured (Mr. Plotner). In this current Demand, Howell demands that the Insurance Commissioner 'immediately' conduct a hearing under RCW 48.04.010(1)(b) and 34.05.240, with respect to the outcome and orders in re: G080-0084 (fraudulent) [Liberty Mutual's 2008 request for approval to acquire the Safeco group] ... *to produce an informal resolution* .... In this current Demand, Howell states that, just as in her *previously served 1) Petition for Declaratory Order; and 2) Motion to Reconsider, she is "NOT" asking the Ins. Comm. to adjudicate this matter, but rather to set a hearing so that we 'as adults' can sit down and determine when, how, and in what increments etc this demands [sic] [her private claims against Safeco and others] will be tendered satisfied.* [All emphases above in original.] In this current Demand, Howell asserts that she is demanding an *informal resolution*,

not a formal adjudication, and that therefore this current Demand should be granted. In fact, just as determined in response to Howell's other filings, the undersigned has no statutory authority or jurisdiction to consider Howell's private claims either formally or informally.

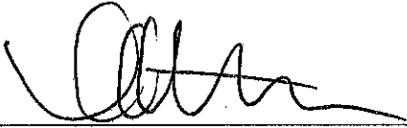
On January 10, 2012, Howell requested to participate in Docket No. 11-0261 [Safeco's request for approval to redomesticate four of the Safeco companies], arguing that the Safeco companies should not be allowed to redomesticate because she believed that she had not been fairly paid by Safeco Insurance Company of Illinois for these same injuries allegedly caused by the Safeco of Illinois insured thirteen years ago. Even so, Howell was allowed to fully participate in No. 11-0261, to file briefs, to appear and testify and to question witnesses at the proceeding in No. 11-0261. As explained to her on the record during that hearing, and as set forth in the Final Order entered therein on January 12, 2012 and in numerous communications since that time, it was determined that Howell's private controversy is not sufficiently relevant to the issue of whether the four named Safeco companies (which in fact did not even include Safeco Insurance Company of Illinois) should not be allowed to redomesticate, and, further, that the undersigned has no statutory authority or jurisdiction to resolve Howell's private claims whether by "adjudication" or "informal resolution," as follows:

- On March 1, 2012, Howell filed a 49 page Petition for Declaratory Order, asking for compensation for the same injuries she alleges the Safeco of Illinois insured caused, and asking for recovery of the same funds she alleges were fraudulently paid to "third parties," i.e., her sister and other relatives, whom she asserts received money that should have been paid to her.
- On March 15, 2012, the undersigned entered an Order Dismissing Howell's Petition for a Declaratory Order, determining that 1) Howell's Petition does not qualify for a Declaratory Order under RCW 34.05.240(1); and 2) even if Howell's Petition were not considered to be a Petition for Declaratory Order but as a Demand for Hearing, that the undersigned had no statutory authority or jurisdiction to consider Howell's private claims against Safeco and others.
- On March 26, 2012, Howell filed a Motion for Reconsideration of the above-referenced Order Dismissing Howell's Petition for a Declaratory Order.
- On April 19, 2012, the undersigned mailed a letter to Howell denying Howell's Motion for Reconsideration, once again stating that she has no statutory authority or jurisdiction to consider Howell's claims.

After a review of Howell's current Demand for Hearing, as above, it is noted that Howell demands a hearing *with respect to the outcome and orders in re: G08-0084* [Liberty Mutual's request for approval to acquire the Safeco group]. First, it is hereby determined that Howell's filing is several years too late: the proceeding in that matter was conducted on September 10, 2008, and a Final Order entered therein on September 18, 2008. Second, it is hereby determined that, as above in response to her earlier filings, Howell has no right to a hearing in this forum under Title 48 RCW or Title 34 RCW, and the undersigned has no statutory authority or jurisdiction to consider Howell's private claims either formally or informally. Finally, Howell's private claims are not sufficiently relevant to the issue in G08-0084 (acquisition).

It is noted that Howell has filed repeated Petitions, Demands and/or other pleadings in the Washington State Supreme Court, and in various other courts in Washington and perhaps elsewhere. Based upon the above repeated determinations, Howell is advised that her Demand for Hearing herein is denied on the basis that she has no right to hearing under Title 48 RCW or Title 34 RCW and the undersigned has no statutory authority or jurisdiction to consider Howell's claims whether in an informal or a formal proceeding. Further, it is noted that due to repeated petitions and other pleadings Howell has filed with the Washington State Supreme Court, that court has determined that any further pleadings filed by Howell would be placed in the closed file and not be responded to (see September 29, 2011 letter to Howell from Susan L. Carlson, Supreme Court Deputy Clerk; Exhibit 6 in Docket No. 11-0261). Similarly, Howell is hereby advised that should she file any further pleadings with this agency concerning her private claims, there will be no response provided. This is a final order. Howell is hereby advised that her right to appeal this final order is set forth below.

This Order is entered this 10<sup>th</sup> day of May, 2012, at Tumwater, Washington, pursuant to Title 48 RCW and particularly RCW 48.04; Title 34 RCW; and regulations pursuant thereto.



PATRICIA D. PETERSEN  
Chief Hearing Officer

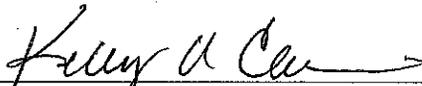
cc: Melvin N. Sorensen, Esq., Carney Badley Spellman, P.S.  
Nicholas F. Potter, Esq., Devoise & Plimpton LLP  
Warren Buffett, Berkshire-Hathaway  
Warren Babb, Lane Powell, P.C.

Pursuant to RCW 34.05.461(3), the parties are advised that, pursuant to RCW 34.05.514 and 34.05.542, this order may be appealed to Superior Court by, within 30 days after date of service (date of mailing) of this order, 1) filing a petition in the Superior Court, at the petitioner's option, for (a) Thurston County or (b) the county of the petitioner's residence or principal place of business; and 2) delivery of a copy of the petition to the Office of the Insurance Commissioner; and 3) depositing copies of the petition upon all other parties of record and the Office of the Attorney General.

Declaration of Mailing

I declare under penalty of perjury under the laws of the State of Washington that on the date listed below, I mailed or caused delivery through normal office mailing custom, a true copy of this document to the people named above at their addresses listed above.

DATED this 11<sup>th</sup> day of May, 2012

  
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KELLY A. CAIRNS