

Leo J. Driscoll's May 19, 2016 Declaration

I, Leo J. Driscoll, declare and state under penalty of perjury of the laws of the state of Washington that the following statements are true and correct:

1. I am of adult age and reside at 4511 E. North Glengrae Ln., Spokane, WA 99223.
2. All matters stated in this declaration are based and made on my own personal knowledge.
3. I am the applicant in the administrative adjudicative proceedings pending before the Washington Insurance Commissioner, Hearings Unit Docket No. ~~12~~16-0002 which seeks a hearing as to the legality of the OIC's approval of a 22.69% request for increase in premiums of the long-term care insurance (LTCI) policy forms series LTC,02, LTC,03, and LTC,04 policy forms, the latter of which include LTCI policies issued myself and my spouse Mary T, Driscoll . 
4. I was also the applicant in the administrative adjudicative proceedings before the Washington State Insurance Commissioner, Hearing Unit Docket No. 14-0187 which sought a hearing as to the legality of the OIC's approval of a 41% request for increase in the same policy forms. Orders issued in that proceeding are the subject of my petition for judicial review filed in the Spokane County Superior Court, Civil Cause No. 15-02-00920-1. Orders issued in that forum are now on appeal to Division III of the Washington Court of Appeals, Case No. 340881.
5. Applicant's Exhibit 18 which is being filed herewith in the OIC Hearings Unit Docket No. 16-0002 proceeding is a true and complete copy of pages 7 and 8 of OIC's Motion for Summary Judgment dated November 7, 2014 served on me in the matter of Hearings Unit Docket No. 14-0187
6. Applicant's Exhibit 19-a which is being filed herewith in the OIC Hearings Unit Docket No. 16-0002 proceeding is a true and complete copy of the page of my application filed by me in the matter of Hearings Unit Docket No. 14-0187 which sets forth paragraph 1.34 of that application.
7. Applicant's Exhibit 19-b which is being filed herewith in the OIC Hearings Unit Docket No. 16-0002 proceeding is a true and complete copy of page 3 of the November 7, 2014 Declaration of OIC actuary Scott Fitzgerald, paragraph 18 of which addresses paragraph 1.34 of my application filed the matter of Hearings Unit Docket No. 14-0187 and served upon me in that proceeding.

8. Applicant's Exhibit 20 which is being filed herewith in the OIC Hearings Unit Docket No. 16-0002 proceeding is a true and complete copy of page 5 of the INSURANCE COMMISSIONER'S RESPONSE TO PETITION FOR JUDICIAL REVIEW served upon me in Spokane County Superior Court Civil Cause No. 15-02-00920-1 proceedings, lines 1-3 and footnote 7 of which page 5 address the provisions of RCW 48.19.010(1) and (2).

Signed by me May 19, 2016 in Spokane County, Washington.



Leo J. Driscoll