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CLERK OF THE SHAWNEE COUNTY DISTRICT COURT
CASE NUMBER: SN-2025-CV-000151
PII COMPLIANT

Steven A. Karrer, KS # 19366
Philip R. Michael, KS # 26072
Kansas Department of Insurance
1300 SW Arrowhead Road
Topeka, KS 66604
785-296-7847
Steve.Karrer@ks.gov
Philip.Michael@ks.gov

Jodi M. Zimmermann, KS # 20741
Bruce E. Baty, KS # 30488
Norton Rose Fulbright US LLP
8001 Forsyth Blvd., Suite 800
St. Louis, MO 63105
314-505-8805
314-505-8804
jodi.zimmermann@nortonrosefulbright.com
bruce.baty@nortonrosefulbright.com

ATTORNEYS FOR PETITIONER

IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS
DIVISION 15

VICKI SCHMIDT, COMMISSIONER OF INSURANCE, *In her Official Capacity,* Petitioner,	)	Case No. 2025 CV 151
vs.	)	
KEY INSURANCE COMPANY, Respondent.	)	

SECOND CLAIMS REVIEW REPORT

COMES NOW Commissioner of Insurance, Vicki Schmidt, in her capacity as Liquidator ("**Liquidator**") of Key Insurance Company ("**Key**"), by and through counsel, and pursuant to K.S.A. 40-3642, presents to this Court the Liquidator's Second Claims Review Report ("**Report**").

This Court entered a Final Order and Judgment of Liquidation with Finding of Insolvency of Key Insurance Company ("**Liquidation Order**") placing Key into liquidation effective April 1, 2025 (the "**Liquidation Date**"), which found Key to be insolvent and terminated the rehabilitation proceedings. The Court appointed the Commissioner and her successors as Liquidator and approved the Liquidator's appointment of Jodi M. Zimmermann (formerly Adolf) and Bruce E. Baty as her Special Deputy Receivers ("**SDRs**"). The Liquidation Order and the Kansas Insurers Supervision, Rehabilitation and Liquidation Act, K.S.A. 40-3605 *et seq.* (the "**Liquidation Act**"), set forth the claim adjudication procedures, and the Liquidation Order set the deadline for filing Proofs of Claim as April 1, 2026 (the "**Bar Date**").

I. Liquidator's First Claim Review Report

On June 10, 2026, this Court entered a Minute Order, approving the Liquidator's recommendations set forth in Revised Exhibit A to the Liquidator's First Claims Review Report ("**First Claims Report**"), as set forth on the record at the June 10, 2026, hearing. In the First Claims Report, the Liquidator noted that as of the Bar Date, 1,427 Proofs of Claim were filed in the Key liquidation estate. Sixteen (16) additional Proofs of Claim have been filed after the Bar Date.

Revised Exhibit A attached to the First Claims Report contained recommendations for 13 Proofs of Claim. Subsequent to the hearing, Key sent Notice of Determination letters ("**NODs**") to the 13 Proof of Claim claimants.

Liquidator's Second Claims Review Report

The Liquidator, by and through the SDRs, has reviewed 256 additional Proofs of Claim and made such further investigation was necessary. The 256 Proofs of Claim are listed on Exhibit A, with the proof of claim number, name and address of each claimant, the Liquidator's recommendation to either allow, allow in part and deny in part, or deny, and the recommended amount allowed, if any.

1. Unearned Premium

Pursuant to the Liquidation Order and K.S.A. 40-3623, all policies and insurance contracts issued by Key in effect on the Liquidation Date, terminated the earlier of (1) 30 days from the date of entry of the Liquidation Order, (2) the expiration of the policy coverage, or (3) the date when the insured has replaced the insurance coverage with equivalent insurance in another insurer or otherwise terminated the policy.

When a policy terminated prior to its expiration date, and Key had already collected premium from the policyholder for coverage up to the expiration date, the policy termination created a claim for unearned premium ("**UEP**"). Key calculated the UEP due to each policyholder and transferred all UEP claims to the affected State Guaranty Associations (the "**SGAs**"). Each of the SGAs' statutes provide that the SGA will cover 100% of the UEP claim. Accordingly, because these policyholders received 100% of the UEP from a SGA, the Liquidator recommends **denying** of the Proofs of Claim listed as 1 through 9 on Exhibit A.

II. Policies Not in Force ("PNIF")

The Liquidator received 61 Proofs of Claim that allege claims under Key policies that were not in force at the time of the loss. These Proofs of Claim are listed on Exhibit A under PNIF – 10 through 70. Because no Key policy was in force at the time of the loss, the Liquidator recommends **denying** the Proofs of Claim listed as 10 through 70 on Exhibit A.

III. Duplicate Proofs of Claim

The Liquidator received 90 Proofs of Claim that are duplicative of another Proof of Claim filed in the Estate. The Liquidator will consider the other Proof of Claim and therefore recommends **denying** of the Proofs of Claim listed as 71 through 160 on Exhibit A.

IV. Agent Commission

At the date of liquidation, the Liquidator ceased payment of commissions to agents. Proofs of Claim 161 through 183 on Exhibit A were filed by agents who had outstanding commission due on the date of liquidation. These claims are classified as Priority Class 5 claims as they are claims of general creditors. The Liquidator recommends **allowing** or **allowing in part** each of the Proofs of Claim listed as 161 through 183 on Exhibit A, in the amount noted on Exhibit A.

V. SGA Proofs of Claim

Eleven SGAs filed Proofs of Claim for policy benefit payments and expenses. The Liquidator transferred claims to four SGAs: Alabama Insurance Guaranty Association ("**AIGA**"), Kansas Insurance Guaranty Association ("**KIGA**"), Nevada Property & Casualty Insurance Guaranty Association ("**NPCIGA**"), and Oklahoma Property & Casualty Insurance Guaranty Association ("**OPCIGA**").

Although Key was licensed in Missouri at the date of Liquidation, it did not write any business in Missouri. Accordingly, the Liquidator did not transfer any claims to the Missouri Insurance Guaranty Association ("**MIGA**"). Accordingly, the Liquidator recommends **denying** MIGA's Proof of Claim.

Western Guaranty Fund Services ("**WGFS**") handles the claims for KIGA. In addition, WGFS handles claims for six other states: Colorado, Idaho, Montana, Nebraska, Washington, and Wyoming. WGFS filed a Proof of Claim for each state it operates in. Key did not do business in or issue any policies in these states. Accordingly, the Liquidator recommends **denying** the Proofs of Claim for each of these state Insurance Guaranty Associations: Colorado, Idaho, Montana, Nebraska, Washington and Wyoming.

Pursuant to K.S.A. 40-3641(a)(6), the "reasonable expenses of a guaranty association or foreign guaranty association in handling claims" are included as Class 1 claims. AIGA, KIGA, NPCIGA and OPCIGA provided Uniform Data Standards ("**UDS**") records to the Liquidator that include loss payments, expenses in handling claims – denominated as Defense Cost and Containment ("**DCC**") expenses. Each SGA's DCC expenses are allowed as Class 1 claims (if determined to be reasonable).

K.S.A. 40-3641 (b) defines Class 2 claims, and includes "[a]ll claims under policies including claims for unearned premium or other premium refunds . . . including third-party claims and all claims of a guaranty association or foreign guaranty association other than those claims included in Class 1." The submitted UDS records include indemnity payments and expenses.

The Liquidator interprets the "all claims of a guaranty association" language with respect to Class 2 claims to include the reasonable Unallocated Loss Adjustment Expenses ("**ULAE**") of

an SGA that the SGAs reports to the Liquidator on its UDS records as Adjusting & Other ("**AO**") expenses. The Liquidator has not yet made any determination of the SGA Class 2 expense claims; however, she will consider reasonable AO expenses.

As for the indemnity payments made by SGAs under Key policies, the Liquidator recommends **allowing as contingent Class 2 claims** the indemnity payments made by AIGA, KIGA, NPCIGA and OPCIGA.

VI. Not Key Policies

The Liquidator received 17 Proofs of Claim that allege claims under policies that are not Key policies. These Proofs of Claim, listed on Exhibit A under Not Key – 195 through 211, seek coverage under policies that were not issued by Key. Accordingly, the Liquidator recommends **denying** of the Proofs of Claim listed as 195 through 211 on Exhibit A.

VII. No Coverage Under Key Policy

The Liquidator received 10 Proofs of Claim listed on Exhibit A under Coverage Denials – 212 through 221 – that allege claims under a Key policy where Key has determined that the accident was not covered under the terms of the policy. The Liquidator recommends **denying** these Proofs of Claim – listed as 212 through 221 on Exhibit A – because there is no coverage under the terms of the policy. These Proofs of Claim are also set forth on **Exhibit B**, with an explanation for denial of each claim.

The Liquidator received 33 Proofs of Claim – listed on Exhibit A under Liability Denials – 222 through 255 – that allege a claim against a Key policy where Key has determined that the Key insured was not legally liable for the damages that resulted from the loss and, accordingly, there is no coverage under the Key policy. Because there is no coverage under the Key policy, the

Liquidator recommends **denying** of the Proofs of Claim listed as 222 through 255 on Exhibit A. These Proofs of Claim are also set forth on Exhibit B, with an explanation for denial of each claim.

VIII. Vendor Claim

One vendor, listed as 256 (Proof of Claim 1-00545) submitted a claim seeking reimbursement of $46,291.25 for outstanding invoices related to accident reconstruction services performed by Aperture, formerly American Bio Engineers. The claim consists primarily of outstanding invoices dating back to 2021 and 2022. A review of available Key records identified inconsistent records, missing invoices, and insufficient documentation to verify the outstanding balances. The claimant did not provide sufficient evidence to establish the veracity of the claim. The Liquidator recommends **denying** Proof of Claim 1-00545 because the amount claimed cannot be adequately substantiated.

WHEREFORE, pursuant to K.S.A. 40-3642, which requires that "the liquidator shall present to the court a report of the claims against the insurer with recommendations thereon", the Liquidator hereby requests that the Court approve her claim recommendations as set forth herein.

Respectively submitted,

/s/ Steven A. Karrer
Steven A. Karrer, KS # 19366
General Counsel
Philip R. Michael, KS # 26072
Assistant General Counsel
Kansas Department of Insurance
1300 SW Arrowhead Road
Topeka, KS 66612
785-296-7847
Steve.Karrer@ks.gov
Philip.Michael@ks.gov

Jodi M. Zimmermann, KS # 20741
Bruce E. Baty, KS # 30488
Norton Rose Fulbright US LLP
8001 Forsyth Blvd., Suite 800
St. Louis, MO 63105
314-505-8805
314-505-8804
jodi.zimmermann@nortonrosefulbright.com
bruce.baty@nortonrosefulbright.com

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Vicki Schmidt, Commissioner of Insurance

Exhibit A

	POC NO.	Claimant Name	Address	Recommendation	Amount
UEP					
1	1-00001	Guojin Chen	Flushing, NY	Deny	$0.00
2	1-00071	Roy McBride	Ulysses, KS	Deny	$0.00
3	1-00073	Valerie Riis	Topeka, KS	Deny	$0.00
4	1-00325	Mandelin Holderman	Haysville, KS	Deny	$0.00
5	1-00434	Aneadra Stewart	Las Vegas, NV	Deny	$0.00
6	1-00477	Kiyara Cummings	Kansas City, KS	Deny	$0.00
7	1-00591	Kirah Stepps	Wichita, KS	Deny	$0.00
8	1-00630	Mahmoud Habash	Wichita, KS	Deny	$0.00
9	1-01369	Demetria Carter	Henderson, NV	Deny	$0.00
PNIF					
10	1-00130	Eliseo Esparza Escobedo [Geico a/s/o]	Tulsa, OK	Deny	$0.00
11	1-00183	City of Las Vegas C/O Carl Warren & CO	Santa Ana, CA	Deny	$0.00
12	1-00184	City of Las Vegas C/O Carl Warren & CO	Santa Ana, CA	Deny	$0.00
13	1-00190	Inacid Tovar [Geico a/s/o]	Derby, KS	Deny	$0.00
14	1-00199	Sarah Tapia	Muskogee, OK	Deny	$0.00
15	1-00230	GEICO AS SUBROGEE OF JASMINEJOHN	Fredericksburg, VA	Deny	$0.00
16	1-00249	GEICO AS SUBROGEE OF SARAH BUTLER	Macon, GA	Deny	$0.00
17	1-00253	The Standard Fire Insurance Company	Hartford, CT	Deny	$0.00
18	1-00269	GEICO a/s/o Carmelita F Echague	Fredericksburg, VA	Deny	$0.00
19	1-00283	Patricia Garcia - Pineda	Las Vegas, NV	Deny	$0.00
20	1-00284	Roberto Cosio - Maria	Las Vegas, NV	Deny	$0.00
21	1-00318	Geico A/S/O Dolores Berwert	Macon, GA	Deny	$0.00
22	1-00400	Lucia Armenta Cardenas	Las Vegas, NV	Deny	$0.00
23	1-00406	Tracy Lynn Cooper [Geico a/s/o]	Shawnee, KS	Deny	$0.00
24	1-00410	Benjamin Lee	Las Vegas, NV	Deny	$0.00
25	1-00419	GEICO AS SUBROGEE OF TROY BABCOCK	New York, NY	Deny	$0.00
26	1-00436	Adalina Santiago Torres	Kansas City, KS	Deny	$0.00
27	1-00437	Juan Alberto Lopez Ojeda	Kansas City, KS	Deny	$0.00
28	1-00438	Mateo Alberto Lopez Santiago	Kansas City, KS	Deny	$0.00
29	1-00439	Ximena Danaee Rodriguez Santiago	Kansas City, KS	Deny	$0.00
30	1-00458	Gallagher Bassett A/S/O Jose Martinez	Clinton, IA	Deny	$0.00
31	1-00532	Raymundo Rodriguez	N. Las Vegas, NV	Deny	$0.00
32	1-00556	Rathbone Group on behalf of Progressive	Brooklyn Heights, OH	Deny	$0.00
33	1-00561	Marisa Rios [AFNI a/s/o]	Lawson, OK	Deny	$0.00
34	1-00593	Curtis Oages	Midwest City, OK	Deny	$0.00
35	1-00605	GEICO General a/s/o Carmelita Echague [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
36	1-00618	Alan Garcia [Wilber a/s/o]	Normal, IL	Deny	$0.00
37	1-00633	Oscar Covarrubias	Oklahoma City, OK	Deny	$0.00
38	1-00661	GEICO a/s/o Jasmine John [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
39	1-00663	GEICO a/s/o Sarah Butler [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
40	1-00698	Randall Smith c/o Interns Exchange of the Auto Club (AAA)	Santa Ana, CA	Deny	$0.00
41	1-00739	Wesley Rusch and Oliver Longboy	Janesville, WI	Deny	$0.00
42	1-00746	GEICO General a/s/o Carlos Cancel-Avila [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
43	1-00853	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
44	1-00856	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
45	1-00897	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
46	1-00898	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
47	1-00923	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
48	1-00965	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
49	1-00966	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
50	1-00968	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
51	1-00991	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
52	1-00994	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
53	1-01001	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
54	1-01010	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
55	1-01013	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
56	1-01025	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
57	1-01035	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
58	1-01052	GEICO Secure a/s/o Jose Castro [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
59	1-01069	GEICO a/s/o Antonio Thrower [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
60	1-01100	Progressive Choice Insurance Company a/s/o CHARLOTTE R HARRIS	Cleveland, OH	Deny	$0.00
61	1-01171	GEICO Casualty a/s/o Vicki Bechthold [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
62	1-01194	Christina Leigh Jones [Geico a/s/o]	New York, NY	Deny	$0.00
63	1-01201	MODOT handled by CMR	Oklahoma City, OK	Deny	$0.00
64	1-01237	Progressive Northern Insurance Company a/s/o CHRISTOPHER A DIFLO	Cleveland, OH	Deny	$0.00

65	1-01253	Allstate ASO Arroyo Maria	Dallas, TX	Deny	$0.00
66	1-01262	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
67	1-01354	Progressive Direct Insurance Company [Faber and Brand LLC]	Cleveland, OH	Deny	$0.00
68	1-01365	USAA Casualty Insurance Company a/s/o Grant Porter	San Antonio, TX	Deny	$0.00
69	1-01377	Garrison Property and Casualty Insurance Company a/s/o Evan Gamble	San Antonio, TX	Deny	$0.00
70	1-01412	Michael Collins	Las Vegas, NV	Deny	$0.00
Duplicates					
71	1-00064	Waldemar Jensen [ITCFinancial Team LLC]	El Dorado, KS	Deny	$0.00
72	1-00100	Kyli Gordon [AFNI a/s/o]	Wichita, KS	Deny	$0.00
73	1-00128	Geico	Macon, GA	Deny	$0.00
74	1-00139	Heather Jackson [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
75	1-00142	Lashawn Wright [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
76	1-00144	Geico A/S/O Susan Randolph	Macon, GA	Deny	$0.00
77	1-00145	Jennifer Rhaburn [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
78	1-00146	Geico A/S/O Burnado Calderia	Macon, GA	Deny	$0.00
79	1-00153	Dayonna Moore [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
80	1-00155	Geico A/S/O Jennifer Lagos	Fredericksburg, VA	Deny	$0.00
81	1-00156	Myrnasuguey Millan [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
82	1-00158	Geico A/S/O Rashad Chen-Tarr	Fredericksburg, VA	Deny	$0.00
83	1-00163	Madan Acharya [Geico a/s/o]	Roeland Park, KS	Deny	$0.00
84	1-00176	GEICO AS SUBROGEE FOR DOUGLAS ANDERSON	Macon, GA	Deny	$0.00
85	1-00177	Geico A/S/O Gloria Koch	Fredericksburg, VA	Deny	$0.00
86	1-00181	GEICO A/S/O LUIS CABRERA	Macon, GA	Deny	$0.00
87	1-00186	GEICO A/S/O Herbert Mims	Macon, GA	Deny	$0.00
88	1-00187	GEICO A/S/O Jodilyn Adams	Macon, GA	Deny	$0.00
89	1-00188	Geico A/S/O Philip Walford	Fredericksburg, VA	Deny	$0.00
90	1-00191	GEICO A/S/O DONOVAN SANNICOLAS	Fredericksburg, VA	Deny	$0.00
91	1-00192	GEICO A/S/O YAMILA GONZALEZ-PULIDO	Macon, GA	Deny	$0.00
92	1-00193	GEICO A/S/O MOHAMMADREZA HOSSEINI	Macon, GA	Deny	$0.00
93	1-00194	GEICO A/S/O BUAKAEW MONTHAISONG	Macon, GA	Deny	$0.00
94	1-00195	GEICO AS SUBROGEE OF ALVIN BROWN	Macon, GA	Deny	$0.00
95	1-00202	GEICO AS SUBROGEE OF LUIS CASTELLANOS VILLANUEVA	Macon, GA	Deny	$0.00
96	1-00203	GEICO AS SUBROGEE OF CHARLENE LAMBEY	Macon, GA	Deny	$0.00
97	1-00204	Nabila Nassri [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
98	1-00205	Maranda James [Geico a/s/o]	Wichita, KS	Deny	$0.00
99	1-00216	GEICO AS SUBROGEE OF DANIEL ANDERSON	Macon, GA	Deny	$0.00
100	1-00217	GEICO AS SUBROGEE OF ARTURO LEYVA-PEREZ	Fredericksburg, VA	Deny	$0.00
101	1-00218	Tabitha Olivas [Geico a/s/o]	Henderson, NV	Deny	$0.00
102	1-00219	Andres Medina [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
103	1-00223	GEICO AS SUBROGEE OF OSCAR QUINTERO	Macon, GA	Deny	$0.00
104	1-00225	Maritza Vasquez Valencia [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
105	1-00229	GEICO AS SUBROGEE OF DENISE GRAY	Macon, GA	Deny	$0.00
106	1-00230	GEICO AS SUBROGEE OF JASMINEJOHN	Fredericksburg, VA	Deny	$0.00
107	1-00231	Ryan Johnson [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
108	1-00238	GEICO AS SUBROGEE OF MARCO ROBLES-LUNA	Macon, GA	Deny	$0.00
109	1-00239	GEICO AS SUBROGEE OF RON APATOVSKY	Macon, GA	Deny	$0.00
110	1-00240	Jocelyn Fuentes Obedo Mancao [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
111	1-00245	Vincent Daley [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
112	1-00247	Bobbie Merie Gonzales [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
113	1-00249	GEICO AS SUBROGEE OF SARAH BUTLER	Macon, GA	Deny	$0.00
114	1-00264	GEICO AS SUBROGEE OF FRANCISCO CARILLO CARRIZO	Macon, GA	Deny	$0.00
115	1-00265	GEICO AS SUBROGEE OF RAESHAWN KEYALA HILL	Macon, GA	Deny	$0.00
116	1-00266	Paola Lechuga Aguinaga [Geico a/s/o]	Dodge City, KS	Deny	$0.00
117	1-00273	GEICO AS SUBROGEE OF MOLASH TESSEMA	Macon, GA	Deny	$0.00
118	1-00274	GEICO AS SUBROGEE OF RUDYARD NAVARRO	Macon, GA	Deny	$0.00
119	1-00275	Deborah Logan [Geico a/s/o]	Vegas, NV	Deny	$0.00
120	1-00276	Peggye Faulkner [Geico a/s/o]	Junction City, KS	Deny	$0.00
121	1-00279	Donna Salazar-Smith [Geico a/s/o]	Henderson, NV	Deny	$0.00
122	1-00281	GEICO AS SUBROGE OF NIKOLAS BUONOCORE	Macon, GA	Deny	$0.00
123	1-00282	GEICO AS SUBROGEE OF JAVI HARTENSTINE	Fredericksburg, VA	Deny	$0.00
124	1-00285	Brian Freeman [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
125	1-00286	Destiny Williams [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
126	1-00294	GEICO AS SUBROGEE OF RUDY GONZALEZ ZAMBRANO	Macon, GA	Deny	$0.00
127	1-00295	GEICO AS SUBROGEE OF JAMES TEEMAN	Macon, GA	Deny	$0.00
128	1-00300	GEICO AS SUBROGEE OF BERNARD GORDON SR	Macon, GA	Deny	$0.00
129	1-00302	Anthony Raymond Gonzalez [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
130	1-00303	Rodolfo Ramirezcaldera [Geico a/s/o]	Perris, CA	Deny	$0.00
131	1-00312	Bealiza - Angelie Guevarra [Geico a/s/o]	Las Vegas, NV	Deny	$0.00

132	1-00313	GEICO AS SUBROGEE OF DONYEL WILLIAMS	Macon, GA	Deny	$0.00
133	1-00314	GEICO AS SUBROGEE OF Jayme McGowan	Fredericksburg, VA	Deny	$0.00
134	1-00315	Geico A/S/O Nakeda Agnew	Macon, GA	Deny	$0.00
135	1-00316	Geico A/S/O Sam Sweat	Fredericksburg, VA	Deny	$0.00
136	1-00317	Jamie Thurman [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
137	1-00323	Scott Pearson [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
138	1-00398	Shelter Insurance Claims		Deny	$0.00
139	1-00402	GEICO AS SUBROGEE OF MIKKELANE STIPE	Macon, GA	Deny	$0.00
140	1-00403	GEICO AS SUBROGEE OF ROSA PEREZ	Macon, GA	Deny	$0.00
141	1-00404	GEICO AS SUBROGEE OF DAVID ELAM	Macon, GA	Deny	$0.00
142	1-00405	GEICO AS SUBROGEE OF MATEEN BEHZADNIA	Macon, GA	Deny	$0.00
143	1-00407	Raul Moreno [Geico a/s/o]	N. Las Vegas, NV	Deny	$0.00
144	1-00412	Bernard Capasso [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
145	1-00413	GEICO AS SUBROGEE OF MATTHEW DONOVAN	New York, NY	Deny	$0.00
146	1-00414	GEICO AS SUBROGEE OF MELISSA SOTO	New York, NY	Deny	$0.00
147	1-00415	GEICO AS SUBROGEE OF MARION RASKIN	New York, NY	Deny	$0.00
148	1-00416	GEICO AS SUBROGEE OF ISAAC BELLO QUEZADA	New York, NY	Deny	$0.00
149	1-00420	GEICO AS SUBROGEE OF STEVEN ARANDA	New York, NY	Deny	$0.00
150	1-00421	GEICO AS SUBROGEE OF ALEC MOORMAN	New York, NY	Deny	$0.00
151	1-00422	Reatee Freeman [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
152	1-00423	Monique Marie Corriveaulumbreras [Geico a/s/o]	Sun Valley, NV	Deny	$0.00
153	1-00426	GEICO AS SUBROGEE OF MADISON JENKINS	New York, NY	Deny	$0.00
154	1-00427	GEICO AS SUBROGEE OF MICHELLE GOMEZ	New York, NY	Deny	$0.00
155	1-00428	GEICO AS SUBROGEE OF DONNIE NEWSON	New York, NY	Deny	$0.00
156	1-00476	Insurance Subrogation Group as subrogee for Victor Vargas	Framingham, MA	Deny	$0.00
157	1-00565	GEICO AS SUBROGEE OF STEPHEN BOWMAN	New York, NY	Deny	$0.00
158	1-00566	GEICO AS SUBROGEE OF TASARAH WHITE	New York, NY	Deny	$0.00
159	1-00714	Progressive Direct Insurance Company a/s/o FATIMA HASAN	Cleveland, OH	Deny	$0.00
160	1-01067	NewCab ACQ LLC Operations Series [Taxi Management LLC]	Las Vegas, NV	Deny	$0.00
Agent Commission					
161	1-00022	Tom Rich Insurance Inc	Kansas City, KS	Allow	$1,800.90
162	1-00095	Eastgate Insurance Services	Osawatomie, KS	In Part	$7.20
163	1-00454	AUTO ACCEPTANCE INSURANCE AGENCY	Wichita, KS	Allow	$14,368.35
164	1-00480	AUTO INSURANCE DISCOUNTERS Key Agency Code: 1496	Independence, MO	Allow	$824.10
165	1-00481	AUTO INSURANCE DISCOUNTERS Key Agency Code: 4351	Independence, MO	Allow	$136.50
166	1-00495	ICT Financial Team LLC - 5675	El Dorado, KS	In Part	$429.60
167	1-00496	ICT Financial Team LLC - 2530	El Dorado, KS	In Part	$228.00
168	1-00501	L.A INS NV30 LLC	Las Vegas, NV	Allow	$416.40
169	1-00502	Secured Insurance LLC c/o Bruce Rodriguez	Las Vegas, NV	Allow	$445.40
170	1-00503	John Kohler - Kohler Insurance	Kansas City, KS	Allow	$289.95
171	1-00589	The Klotz Agency INC	Leavenworth, KS	Allow	$152.40
172	1-00666	LA Insurance NV 1 - Agent Code 7307	Las Vegas, NV	Allow	$1,010.00
173	1-00667	LA Insurance NV3 - Agent Code 7308	Las Vegas, NV	Allow	$630.45
174	1-00668	LA Insurance NV8 - Agent Code 7357	Las Vegas, NV	Allow	$466.10
175	1-00669	LA Insurance NV13 - Agent Code 7542	Las Vegas, NV	Allow	$550.80
176	1-00670	LA Insurance NV21 - Agent Code 7507	Las Vegas, NV	Allow	$1,062.10
177	1-00671	LA Insurance NV38 - Agent Code 7845	Las Vegas, NV	Allow	$221.60
178	1-00672	LA Insurance NV40 - Agent Code 7866	Las Vegas, NV	Allow	$800.30
179	1-00673	LA Insurance NV41 - Agent Code 7867	Las Vegas, NV	Allow	$136.70
180	1-00674	LA Insurance NV43 - Agent Code 7869	Las Vegas, NV	Allow	$730.70
181	1-00700	Jordan Tatum LLC - Agent Code 9769	Tulsa, OK	Allow	$74.40
182	1-00701	Silva Taxes and Insurance LLC - Agent Code 7595	Las Vegas, NV	Allow	$40.00
183	1-01207	Rodina Insurance Agency	Kansas City, KS	Allow	$237.45
SGA					
184	1-00751	Colorado Insurance Guaranty Association	Denver, CO	Deny	$0.00
185	1-00752	Idaho Insurance Guaranty Association	Denver, CO	Deny	$0.00
186	1-00753	Kansas Insurance Guaranty Association	Denver, CO	Contingent	unknown
187	1-00754	Montana Insurance Guaranty Association	Denver, CO	Deny	$0.00
188	1-00755	Nebraska Property & Liability Insurance Guaranty Association	Denver, CO	Deny	$0.00
189	1-00756	Washington Insurance Guaranty Association	Denver, CO	Deny	$0.00
190	1-00757	Wyoming Insurance Guaranty Association	Denver, CO	Deny	$0.00
191	1-00783	Missouri Property & Casualty Insurance Guaranty Association	Jefferson City, MO	Deny	$0.00
192	1-01213	Nevada Insurance Guaranty Association	Las Vegas, NV	Contingent	unknown
193	1-01266	Alabama Insurance Guaranty Association	Birmingham, AL	Contingent	unknown
194	1-01311	Oklahoma Property and Casualty Insurance Guaranty Association	Indianapolis, IN	Contingent	unknown
Not Key					
195	1-00039	American Family Insurance	Madison, WI	Deny	$0.00
196	1-00174	Venus Five Holdings LLC	Las Vegas, NV	Deny	$0.00

197	1-00178	Geico A/S/O Michael Ready	Macon, GA	Deny	$0.00
198	1-00241	Anna Christina Koltai [Geico a/s/o]	San Diego, CA	Deny	$0.00
199	1-00251	Lamar Covington [Geico a/s/o]	Raleigh, NC	Deny	$0.00
200	1-00267	Z N Maganasanabria [Geico a/s/o]	Riverview, FL	Deny	$0.00
201	1-00429	Maribel Morales [Geico a/s/o]	Sunny Isles Beach, FL	Deny	$0.00
202	1-00451	Mayra Fuentes	Las Vegas, NV	Deny	$0.00
203	1-00452	Angie Saucedo	Las Vegas, NV	Deny	$0.00
204	1-00479	ISO Services INC [Verisk]	Jersey City, NJ	Deny	$0.00
205	1-00559	GEICO AS SUBROGEE OF RONALD KOSLOROWSKI	New York, NY	Deny	$0.00
206	1-00749	GEICO Indemnity a/s/o Lamar Covington [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
207	1-01051	GEICO Choice a/s/o Gavin Fisher [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
208	1-01174	Allstate ASO Amy Shoulders	Dallas, TX	Deny	$0.00
209	1-01196	John Nelson [Insurance Subrogation Group a/s/o]	Downers Grove, IL	Deny	$0.00
210	1-01260	USAA General Indemnity Company [Rathbone Group, LLC a/s/o]	San Antonio, TX	Deny	$0.00
211	1-01432	Tesla Insurance a/s/o Michael Walker [Digital Insurance Services a/s/o]	Philadelphia, PA	Deny	$0.00
Coverage Denials					
212	1-00359	Enterprise - Damage Recovery Unit	Kansas City, MO	Deny	$0.00
213	1-00708	Progressive Direct Insurance Company a/so DORIAN L SOTO	Cleveland, OH	Deny	$0.00
214	1-00849	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
215	1-00891	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
216	1-00963	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
217	1-00964	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
218	1-00977	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
219	1-01222	United Financial Casualty Company PORTIER LLC PERIOD 2 3	Cleveland, OH	Deny	$0.00
220	1-01293	Casualty Underwriters Insurance Company [Utah Receivers Office]	Salt Lake City, UT	Deny	$0.00
221	1-01372	TRISTAR A/S/O Turo	City of Industry, CA	Deny	$0.00
Liability Denials					
222	1-00018	The Travelers Insurance Co A/S/O Jacqueline Glisson	Dallas, TX	Deny	$0.00
223	1-00062	NewCab ACQ LLC Operations Series [Taxi Management LLC a/s/o]	Las Vegas, NV	Deny	$0.00
224	1-00080	Brotherhood Mutual Insurance Company	Fort Wayne, IN	Deny	$0.00
225	1-00179	Jackeline Damian [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
226	1-00197	Tiffany Flournoy [Geico a/s/o]	Las Vegas, NV	Deny	$0.00
227	1-00278	GEICO AS SUBROGEE OF JIMMY BOLINGER	Macon, GA	Deny	$0.00
228	1-00307	WILBER o/b/o SAFECO INSURANCE COMPANY OF AMERICA A/S/O MICHAEL HUGHES	Normal, IL	Deny	$0.00
229	1-00310	Farm Bureau Property and Casualty	W. Des Moines, IA	Deny	$0.00
230	1-00376	Allstate ASO Julio Lascano	Dallas, TX	Deny	$0.00
231	1-00526	USAA [Maybank & Owings, LLC a/s/o]	San Antonio, TX	Deny	$0.00
232	1-00553	Rathbone Group on behalf of Progressive	Brooklyn Heights, OH	Deny	$0.00
233	1-00603	GEICO General a/s/o Stephanie Johnson [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
234	1-00654	Progressive Northern Insurance Company a/s/o ROBERT MUNROE	Cleveland, OH	Deny	$0.00
235	1-00781	Progressive Northern Insurance Company [Faber and Brand LLC a/s/o]	Columbia, MO	Deny	$0.00
236	1-00788	GEICO a/s/o Jesus Quintero [Insurance Subrogation Group a/s/o]	Framingham, MA	Deny	$0.00
237	1-00830	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
238	1-00831	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
239	1-00835	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
240	1-00836	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
241	1-00837	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
242	1-00889	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
243	1-00903	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
244	1-00907	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
245	1-00909	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
247	1-00953	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
248	1-00958	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
249	1-01002	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
250	1-01014	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Deny	$0.00
251	1-01091	Progressive Northern Insurance Company a/s/o JADA MCBRIDE	Cleveland, OH	Deny	$0.00
252	1-01115	Progressive Direct Insurance Company a/s/o JAZZ K WRIGHT	Cleveland, OH	Deny	$0.00
253	1-01236	Progressive Northern Insurance Company a/s/o LAURA L WOLF	Cleveland, OH	Deny	$0.00
254	1-01242	Progressive Direct Insurance Company a/s/o WENDY WENTWORTH	Cleveland, OH	Deny	$0.00
255	1-01244	Progressive Direct Insurance Company a/s/o TERRION YOUNG	Cleveland, OH	Deny	$0.00
Vendor Charges					
256	1-00545	Aperture LLC DBA American Bio Engineers	Arlington, TX	Deny	$0.00

Exhibit B

POC No.	Claimant Name	Address	Denial Reason
Coverage Denials			
1-00359	Enterprise - Damage Recovery Unit	Kansas City, MO	Subrogation demand for damage to a vehicle rented by the insured person. The policy does not cover damage to rented vehicles.
1-00708	Progressive Direct Insurance Company a/so DORIAN L SOTO	Cleveland, OH	The driver of the insured vehicle could not be identified. Coverage was denied because the insured person and the driver did not cooperate with the investigation.
1-00849	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The legal deadline for bringing the claim passed before we received the Proof of Claim. The insured vehicle was being driven by someone not listed on the policy. Coverage was denied because the insured person and the driver did not cooperate with the investigation.
1-00891	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The investigation found that the driver, who was not listed on the policy, owned the insured vehicle and lived in the same household as the insured person. Coverage was denied because materially false or misleading information was provided when applying for the policy.
1-00963	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The insured vehicle was being driven by someone not listed on the policy. Coverage was denied because the insured person and the driver did not cooperate with the investigation.
1-00964	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The vehicle involved was not listed on the policy. The Special Investigation Unit investigated the loss and determined that fraud was involved.
1-00977	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage was denied because the insured person did not cooperate with the investigation.
1-01222	United Financial Casualty Company PORTIER LLC PERIOD 2 3	Cleveland, OH	Coverage was denied because of the policy's business use exclusion.
1-01293	Casualty Underwriters Insurance Company [Utah Receivers Office]	Salt Lake City, UT	The driver of the insured vehicle could not be identified. Coverage was denied because the insured person and the driver did not cooperate with the investigation.
1-01372	TRISTAR A/S/O Turo	City of Industry, CA	A driver not listed on the policy was driving a rented vehicle that was also not listed on the policy. The claim is for damage to that rented vehicle. The policy does not cover damage to rented vehicles.
Liability Denials			
1-00018	The Travelers Insurance Co A/S/O Jacqueline Glisson	Dallas, TX	The insured vehicle was rear-ended in an accident involving multiple vehicles. Liability was denied because the insured person was not considered responsible for the accident. Progressive paid for the damage to the insured vehicle.
1-00062	NewCab ACQ LLC Operations Series [Taxi Management LLC a/s/o]	Las Vegas, NV	Coverage under the policy cannot be established because the drivers gave conflicting accounts of a lane-merging accident.
1-00080	Brotherhood Mutual Insurance Company	Fort Wayne, IN	The insured vehicle was stolen, and the accident occurred while it was in the thief's possession.
1-00179	Jackeline Damian [Geico a/s/o]	Las Vegas, NV	Coverage under the policy cannot be established because each driver said the other driver ran the stop sign. There were no independent witnesses or other evidence to establish which account was correct.
1-00197	Tiffany Flournoy [Geico a/s/o]	Las Vegas, NV	The other driver's vehicle rear-ended the insured vehicle.

1-00278	GEICO AS SUBROGEE OF JIMMY BOLINGER	Macon, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light.
1-00307	WILBER o/b/o SAFECO INSURANCE COMPANY OF AMERICA A/S/O MICHAEL HUGHES	Normal, IL	Coverage under the policy cannot be established because the drivers disputed who was responsible for a lane-merging accident. The police report assigned fault to both drivers. The other driver merged into the lane in which the insured vehicle was traveling. The denial was based on the determination that the other driver was mostly at fault and therefore could not receive compensation.
1-00310	Farm Bureau Property and Casualty	W. Des Moines, IA	Coverage under the policy cannot be established because the drivers gave conflicting accounts of an accident at an intersection without traffic lights or stop signs. There were no independent witnesses.
1-00376	Allstate ASO Julio Lascano	Dallas, TX	Coverage under the policy cannot be established because the drivers gave conflicting accounts of the accident. There were no witnesses or police report.
1-00526	USAA [Maybank & Owings, LLC a/s/o]	San Antonio, TX	The other driver pulled out of a parking lot and failed to yield the right of way to the insured driver.
1-00553	Rathbone Group on behalf of Progressive	Brooklyn Heights, OH	Coverage under the policy cannot be established because each driver said the other driver ran the red light. The vehicle damage supports the insured driver's account of the accident.
1-00603	GEICO General a/s/o Stephanie Johnson [Insurance Subrogation Group a/s/o]	Framingham, MA	The insured vehicle was traveling along a parking-lot aisle when the other driver pulled out of a parking space.
1-00654	Progressive Northern Insurance Company a/s/o ROBERT MUNROE	Cleveland, OH	The insured driver reported that their vehicle was stopped when the other driver turned left into it. There was snow on the ground.
1-00781	Progressive Northern Insurance Company [Faber and Brand LLC a/s/o]	Columbia, MO	The other driver failed to yield the right of way when the insured vehicle had control of the intersection.
1-00788	GEICO a/s/o Jesus Quintero [Insurance Subrogation Group a/s/o]	Framingham, MA	Coverage under the policy cannot be established because each driver said the other driver ran the red light.
1-00830	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The legal deadline for bringing the claim passed before we received the Proof of Claim. Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00831	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00835	State Farm Mututal Automobile Insurance Company	Atlanta, GA	This accident involved multiple vehicles. Key accepted responsibility for the first collision, but not for the damage to the vehicle in this claim. Its occupants told police they had stopped in time to avoid the initial collision. Their vehicle was then rear-ended by a semi-truck.
1-00836	State Farm Mututal Automobile Insurance Company	Atlanta, GA	This accident involved multiple vehicles. Key accepted responsibility for the first collision, but not for the damage to the vehicle in this claim. Its occupants told police they had stopped in time to avoid the initial collision. Their vehicle was then rear-ended by a semi-truck.

1-00837	State Farm Mututal Automobile Insurance Company	Atlanta, GA	This accident involved multiple vehicles. Key accepted responsibility for the first collision, but not for the damage to the vehicle in this claim. Its occupants told police they had stopped in time to avoid the initial collision. Their vehicle was then rear-ended by a semi-truck.
1-00889	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00903	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00907	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00909	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00953	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-00958	State Farm Mututal Automobile Insurance Company	Atlanta, GA	Coverage under the policy cannot be established because the drivers gave conflicting accounts of an accident at an intersection without traffic lights or stop signs. There were no independent witnesses.
1-01002	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The legal deadline for bringing the claim passed before we received the Proof of Claim. Coverage under the policy cannot be established because the drivers disputed who was responsible for a lane-merging accident.
1-01014	State Farm Mututal Automobile Insurance Company	Atlanta, GA	The legal deadline for bringing the claim passed before we received the Proof of Claim. Coverage under the policy cannot be established because the drivers disputed who was responsible for a lane-merging accident.
1-01091	Progressive Northern Insurance Company a/s/o JADA MCBRIDE	Cleveland, OH	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses. The company making the subrogation demand against the insured person also paid the insured person for their injuries and included proof of that payment with its demand.
1-01115	Progressive Direct Insurance Company a/s/o JAZZ K WRIGHT	Cleveland, OH	The legal deadline for bringing the claim passed before we received the Proof of Claim. The other driver failed to yield the right of way while making an improper turn.
1-01236	Progressive Northern Insurance Company a/s/o LAURA L WOLF	Cleveland, OH	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-01242	Progressive Direct Insurance Company a/s/o WENDY WENTWORTH	Cleveland, OH	Coverage under the policy cannot be established because each driver said the other driver ran the red light. There were no independent witnesses.
1-01244	Progressive Direct Insurance Company a/s/o TERRION YOUNG	Cleveland, OH	Coverage under the policy cannot be established because the drivers gave conflicting accounts of a lane-merging accident.