

MAR 8 1995

STATE OF ARIZONA

DEPARTMENT OF INSURANCE

DEPARTMENT OF INSURANCE
By

In the Matter of)	Docket No. 8593
)	
COMMONWEALTH LIFE INSURANCE)	
COMPANY; FIRST GENERAL)	
INSURANCE COMPANY; and THE)	ORDER
TRAVELERS INDEMNITY COMPANY)	
OF AMERICA,)	
)	
Petitioners.)	

The hearing in this matter took place on February 6, 1995. Commonwealth Life Insurance Company ("Commonwealth"), First General Insurance Company ("First General"), and The Travelers Indemnity Company of America ("Travelers"), collectively referred to as the "Petitioners", appeared through Michael Hensley and Robert Baldwin. Assistant Attorney General Patrick Irvine appeared on behalf of the Department.

The record of this matter consists of all pleadings, motions, testimony, and exhibits admitted during the hearing of this matter. From this record, Administrative Law Judge Gregory Y. Harris has prepared the following Findings of Fact, Conclusions of Law, and Order for consideration and approval by the Director of the Arizona Department of Insurance (the "Director"). The Director adopts and enters the following Findings of Fact, Conclusions of Law and enters the following Order:

FINDINGS OF FACT and CONCLUSIONS OF LAW

A. Background Discussion

1. Like many other states, Arizona imposes a retaliatory tax against insurers domiciled in jurisdictions that

1 assess taxes against Arizona domiciled insurers at a rate greater
2 than the tax rate imposed upon insurers by Arizona. A.R.S.
3 §20-230(A); Pacific Mutual Life Insurance Company v. Bushnell,
4 97 Ariz. 18, 21 at n. 1, 396 P.2d 253, 254 at n. 1 (1964)
5 ("Pacific Mutual"); Metropolitan Life v. Insurance
6 Commissioner, 58 Md. App. 457, 459, 463 at n. 3, 473 A.2d 933,
7 934, 937 at n. 3. This statute provides that taxes imposed by a
8 jurisdiction's political subdivisions constitute a tax of that
9 jurisdiction. By accounting for all taxes imposed by another
10 jurisdiction, the statute serves "to equalize taxation of
11 insurance companies." Pacific Mutual, 97 Ariz. at 20, 396
12 P.2d at 254.

13 2. Commonwealth, a Kentucky domiciled insurance
14 company, transacts insurance in Arizona. During the years at
15 issue in this proceeding, Arizona domiciled insurers transacted
16 insurance in Kentucky.

17 3. Kentucky has approximately 500 political
18 subdivisions including cities, urban counties and counties.
19 Kentucky law permits political subdivisions to assess taxes on
20 insurance. Approximately 200 of these political subdivisions
21 impose some form of tax on insurance, ranging up to 14%.

22 4. First General and Travelers, Georgia domiciled
23 insurance companies at all times relevant to this matter,
24 transact insurance in Arizona. During the years at issue in this
25 proceeding, Arizona domiciled insurers transacted insurance in
26 Georgia.

27 5. Georgia counties may levy taxes on insurance.
28

1 6. In October, 1994, the Department issued notices to
2 the Petitioners. These notices advised the Petitioners that
3 consistent with the provisions of the April 5, 1994 Order entered
4 by the Director (the "Kentucky Central Order") and the
5 requirements of A.R.S. §20-230(A), the Petitioners' retaliatory
6 tax liability had been calculated, or as applicable,
7 recalculated. See In the Matter of Kentucky Central Insurance
8 Company, et al., Docket No. 7760 (consolidated with Docket Nos.
9 8024, 8025, and 8083) ("Kentucky Central").

10 7. The Department has interpreted the Kentucky
11 Central Order to require that any reassessments, in the absence
12 of a rule stating another method, be based on the actual burden
13 of local premium taxes on Arizona insurers doing business in the
14 other state as determined by the "Survey Method." See
15 ¶¶ 16 - 21 below.

16 8. The Petitioners filed timely requests for hearing
17 to challenge the assessments contained in the Notices issued by
18 the Department. Because of the common issues presented by the
19 Petitioners, the requests were consolidated for hearing.

20 9. This proceeding presents the question of whether
21 the Department may consider the local tax burden faced by Arizona
22 domiciled insurers in Kentucky and Georgia when calculating the
23 retaliatory tax obligations of Kentucky and Georgia domiciled
24 insurers. Also at issue in this proceeding is First General's
25 refund claim for 1989 for which it had paid retaliatory taxes.

26 10. The Department had also issued a notice in
27 October, 1994 to Bradford National Indemnity Company
28 ("Bradford"). Initially, Bradford's challenge had been

1 consolidated with this matter. However, Bradford's tax liability
2 has been resolved and an Order dismissing its appeal has been
3 entered.

4 11. The Kentucky Central proceedings included two
5 other Kentucky insurers and two New York insurers, none of which
6 have any involvement in the resolution of the question of the
7 Petitioners' retaliatory tax liability. Kentucky Central Life
8 Insurance Company is currently in receivership. No reassessments
9 have been issued to it or its subsidiary, Kentucky Central
10 Insurance Company. No reassessments have been issued to
11 Metropolitan Life Insurance Company or New York Life Insurance
12 Company because no Arizona life insurers paid any local or
13 regional taxes in the State of New York for the years at issue.

14 B. Discussion of Kentucky Central

15 12. This proceeding represents a continuation of the
16 Department's efforts in Kentucky Central to assess and collect
17 retaliatory taxes owed by the Petitioners pursuant to A.R.S.
18 §20-230(A). The Kentucky Central proceedings began in 1992.

19 13. This matter includes within its scope tax years
20 that were not addressed in Kentucky Central, and also omits any
21 effort to collect retaliatory taxes for other years:

	<u>Kentucky Central</u>	<u>Docket No. 8593</u>
23 Commonwealth	1986-1991	1989-1993
24 First General	1988-1991	1988-1993 (except 1989)
Travelers	1986-1992	1988-1993

25 14. The Kentucky Central Order did not terminate the
26 proceedings related to the assessment and calculation of the
27 Petitioners' retaliatory tax obligations. See Kentucky Central
28 Order; see also A.R.S. §12-901(2) (definition of

1 "administrative decision"). That order specifically required
2 that further proceedings be conducted to conclusively resolve the
3 question of the extent of the Petitioners' retaliatory tax
4 liability. These proceedings represent the culmination of the
5 administrative process to resolve questions regarding the
6 Petitioners' retaliatory tax liability for all years preceding
7 1994.

8 15. In Kentucky Central, the Director made findings on
9 questions of law, many of which have been reurged by the
10 Petitioners in this phase of the proceeding. These issues
11 include questions of jurisdiction, the constitutionality of
12 A.R.S. §20-230(A), whether estoppel prevents the Department from
13 enforcing this statute, and whether this statute may be enforced
14 without a rule. In relevant part, the Kentucky Central Order
15 provided as follows:

16 CONCLUSIONS OF LAW

17 1. This matter is within the jurisdiction
18 of the Director of the Arizona Department of
19 Insurance pursuant to A.R.S. § 20-101 et seq. and
20 the regulations promulgated thereunder.

21 2. Arizona Revised Statute, Section 20-230,
22 which authorizes retaliatory taxes against foreign
23 and alien insurers who do business in the State of
24 Arizona, based on state, municipal and political
25 subdivision taxes imposed on insurance, is a
26 constitutional tax provision which provides fair
27 notice to all insurers who intend to do business
28 in this state.

3. The Department of Insurance is not
estopped to assert retaliatory taxes against any
foreign or alien insurer who does business in the
State of Arizona.

4. The assessment of retaliatory taxes is
not dependent upon adoption of rules pursuant to
the Administrative Procedures Act, A.R.S.
§ 41-1001 et seq.

1 states of domicile and the taxes payable in those states, and
2 consisted of a comparison of the tax burden of each state with
3 the tax levy imposed by Arizona (the "Survey Method").

4 18. The audit consisted of a survey of Arizona
5 domiciled insurers to learn what taxes those insurers had paid to
6 other states. The Survey Method accounted for the premium
7 received by Arizona domiciled insurers from the transaction of
8 insurance in those other jurisdictions. The consideration of
9 premium receipts also consisted of an evaluation of whether the
10 premium would have been subject to tax under Arizona law if the
11 premium had been received in Arizona. Using the Survey Method,
12 the Department used the same formula to calculate the retaliatory
13 tax liabilities of both Georgia and Kentucky domiciled insurers.

14 19. The Department required each Arizona domiciled
15 insurer doing business in Georgia or Kentucky to report the
16 respective premium receipts and the local taxes paid (broken down
17 by jurisdiction) for each of the years 1988 through 1993. For
18 1988 to 1991, the Department obtained this information through a
19 special request made in 1992. For 1992 and 1993, insurers
20 provided this information along with the annual reports filed for
21 those years. The Department totalled these numbers, with life
22 insurers considered separately from property and casualty
23 insurers. The Department divided total local taxes paid by
24 Arizona insurers by the total premiums collected by Arizona
25 insurers to calculate the actual burden of local premium taxes on
26 Arizona insurers in Georgia and Kentucky. Using the Survey
27 Method, the Department applied this rate to Arizona premiums
28 received by insurers domiciled in Georgia and Kentucky to

1 calculate whether these insurers owed retaliatory taxes to
2 Arizona pursuant to A.R.S. § 20-230(A).

3 20. The Department's application of the Survey Method
4 to Georgia domiciled insurers for this matter yielded the same
5 tax rate from which Travelers' retaliatory tax obligations were
6 calculated in Kentucky Central. The assessments challenged by
7 both Travelers and First General used the following tax
8 rates:

<u>Tax Year</u>	<u>Kentucky Central Tax Rate</u>	<u>Docket No. 8563 Tax Rate</u>
1988	2.00%	2.00%
1989	2.08%	2.08%
1990	2.13%	2.13%
1991	2.08%	2.08%
1992	2.31%	2.31%
1993	n/a	1.50%

14 21. The Survey Method produced the following results
15 for the calculation of Commonwealth's retaliatory tax liability:

<u>Tax Year</u>	<u>Tax Rate</u>
1989	4.46%
1990	4.06%
1991	3.15%
1992	3.00%
1993	1.31%

20 22. In making assessments and reassessments against
21 the Petitioners, the Department applied the statutes of
22 limitations of the insurer's domiciliary state. For
23 Commonwealth, the Department applied Ky. Rev. Stat. Ann.
24 § 413.120(2), which prescribes a five-year statute of
25 limitations. For Georgia domiciled insurers, the Department
26 applied the seven-year statute of limitations prescribed by Ga.
27 Code Ann. § 33-2-30. Because First General had originally only
28 been assessed for 1988 and later years, the Department did not

1 make any assessments for 1987 for either of the Georgia domiciled
2 companies.

3 23. The Department has made the following assessments
4 and reassessments against Commonwealth:

5

<u>Tax Year</u>	<u>Tax Assessed/Reassessed</u>
6 1989	\$ 46,289.56
7 1990	59,519.34
8 1991	20,350.62
9 1992	61,927.86
10 1993	<u>29,660.29</u>
TOTAL	\$ 217,747.67

11 Consistent with the Kentucky Central Order, the Department has
12 not assessed interest or penalties against Commonwealth.

13 24. The Department has made the following assessments
14 and reassessments against First General:

15

<u>Tax Year</u>	<u>Tax Assessed/Reassessed</u>
16 1988	\$ 189,481.05
17 1990	(14,631.00)
18 1991	99,710.95
19 1992	<u>198,499.52</u>
TOTAL	\$ 470,060.52

20 Consistent with the Kentucky Central Order, the Department has
21 not assessed interest or penalties against First General.

22 25. The Department has made the following assessments
23 and reassessments against Travelers:

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<u>Tax Year</u>	<u>Tax Assessed/Reassessed</u>
1988	\$ 75,407.85
1989	71,004.65
1990	42,980.22
1991	30,088.60
1992	46,256.66
1993	46,308.90
TOTAL	\$ 312,046.88

Consistent with the dictates of the Kentucky Central Order, the Department has not assessed interest or penalty against Travelers.

D. Discussion of the Legal Issues Presented in This Matter

26. The Petitioners' filing of a suit in superior court to challenge the Kentucky Central Order did not divest the Director of jurisdiction to determine the Petitioners' retaliatory tax liability. First, that order expressly provided that its issuance did not terminate the administrative proceedings. Until the Director issues an order finally determining the Petitioners' retaliatory tax liability for the years at issue in this matter and terminating these proceedings, this matter is not ripe for judicial review. A.R.S. §12-905(A); See A.R.S. §12-901(2) (defining an "agency decision" reviewable under the Judicial Review of Administrative Decisions Act to mean "any decision . . . which terminates the proceeding before the agency.") Second, this matter includes tax years in addition to those included within the scope of the Kentucky Central Order. Third, the parties have represented their entry into a stipulation to stay the superior court proceedings pending the resolution of this matter. However, the parties did not make this stipulation part of the record in this matter.

1 27. The Department is not collaterally estopped from
2 conducting this proceeding by virtue of the litigation over which
3 Hon. Paul LaPrade presided. Metropolitan Life Insurance Company
4 v. Director, Maricopa County Superior Court Cause No. C319019
5 ("Metropolitan Life"). That action concluded with the parties'
6 entry into a consent judgment. Metropolitan Life, Stipulation
7 and Consent Judgment, dated December 22, 1977. In relevant part,
8 the stipulation provided that "the parties have compromised and
9 settled their differences and therefore stipulate that the Court
10 may enter the Consent Judgment attached hereto, which completely
11 disposes of the years 1971, 1972 and 1973." The Consent Judgment
12 resolved the issue raised by the Plaintiffs in the paragraph IV
13 of the complaint in that action. Metropolitan Life, Complaint
14 for Judicial Review, dated August 25, 1975.

15 28. In Metropolitan Life, Judge LaPrade entered a
16 minute entry regarding questions of law raised in the
17 Metropolitan Life Complaint for Judicial Review. The minute
18 entry addressed only legal issues and not facts. The minute
19 entry did not contain findings or discussion to explain or
20 support the minute entry's basis. Further, neither the Consent
21 Judgment nor the stipulation in support of the entry of the
22 Consent Judgment contained any references to the minute entry.
23 Therefore, the entry of a consent judgment precludes the
24 application of collateral estoppel effect to the resolution of
25 that matter. Chaney Building Co. v. City of Tucson, 148 Ariz.
26 571, 573, 716 P.2d 28, 30 (1986).

27 29. The statute applied by the Department to collect
28 the retaliatory tax assessments at issue in this proceeding,

1 A.R.S. §20-230(A), is neither unconstitutionally vague nor does
2 the statute constitute an unlawful delegation of legislative
3 authority to the Director. The statute provides for the
4 assessment of a retaliatory tax. The statute provides the
5 parameters to be followed by the Department to determine another
6 jurisdiction's tax rate. The statute specifically provides that
7 when the Department calculates retaliatory tax assessments, the
8 obligations subject to retaliation include both those imposed by
9 the central government of another jurisdiction and those imposed
10 by the jurisdiction's political subdivisions.

11 30. The Department's enforcement of the Legislature's
12 mandate in A.R.S. §20-230(A) does not deny Petitioners due
13 process. This statute puts the Petitioners and all insurers on
14 notice of the Legislature's imposition of a retaliatory tax. The
15 statute also places all on notice that the assessment and
16 collection of any applicable retaliatory taxes will include
17 consideration of all tax obligations imposed by political
18 subdivisions of another jurisdiction. Therefore, the
19 Department's enforcement of the Legislature's mandate to equalize
20 tax burdens does not violate constitutional prohibitions against
21 the enforcement of vague or ambiguous laws.

22 31. The Department's enforcement of the Legislature's
23 mandate in A.R.S. §20-230(A) does not constitute an unlawful
24 delegation of legislative authority. This law prescribes the
25 parameters within which the Department must collect the tax
26 enacted by the Legislature. The law does not enable the Director
27 to choose whether to collect the retaliatory tax, or the items
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1 subject to retaliatory tax. Instead, the law compels the
2 Director to assess and collect a tax enacted by the Legislature.

3 32. The Department's enforcement of the Legislature's
4 mandate in A.R.S. §20-230(A) does not constitute an unlawful
5 rule. The variables involved in this process of collecting the
6 retaliatory tax assessed by the Legislature have not been left to
7 the discretion of the Director. The variables have been defined
8 with precision. The Director has been instructed to consider
9 every tax obligation imposed by another jurisdiction when
10 calculating that jurisdiction's tax burdens relative to Arizona.
11 Every insurer, whether domestic or otherwise, may independently
12 verify the Director's results and conclusions. The calculation
13 contains no subjective elements. The variables involved are not
14 subject to definitional dispute. Further, the formula used by
15 the Department represents a simple mathematical exercise. The
16 application of this formula to execute an already prescribed
17 dictate of the Legislature does not transform the formula
18 selected by the Department into a rule.

19 33. The Legislature has defined rule to mean "[a]n
20 agency statement of general applicability that implements,
21 interprets or prescribes law or policy" A.R.S.
22 §41-1001(17). This Department's enforcement of the retaliatory
23 tax law represents the execution of the Legislature's mandate.
24 No law has been implemented. The enactment of A.R.S. §20-230
25 implemented Arizona's Retaliatory Tax Act. No interpretation has
26 occurred. The law requires retaliation against all taxes imposed
27 by another jurisdiction, including taxes imposed by a
28 jurisdiction's political subdivision. The challenged assessments

1 and the formula used to calculate the assessments comply with the
2 law's requirements. Finally, the assessment formula does not
3 represent a prescription of the applicable law because the law
4 clearly establishes the confines of the tax.

5 34. The formula used by the Department to carry out
6 the Legislature's directive under A.R.S. §20-230 incorporates
7 only the variables prescribed in the statute. Without employing
8 any subjective elements, this formula allows the Department to
9 compare the the tax burden faced by Arizona insurers in other
10 jurisdictions to the burden faced by insurers from other
11 jurisdictions in Arizona.

12 35. The Director's decision not to terminate the
13 earlier proceedings in Kentucky Central and to instruct the
14 Department to reassess retaliatory taxes against the Petitioners
15 did not constitute a rejection of the Survey Method. The issues
16 raised in Kentucky Central involved different assessments
17 involving insurers from several jurisdictions in a consolidated
18 hearing process in which more than one formula had been applied
19 to calculate each insurer's retaliatory tax obligation. The
20 Survey Method used to finally resolve this matter represents the
21 Director's determination that the uniform application of this
22 formula satisfies the Legislature's prescription.

23 36. The Petitioners' claims regarding self-assessment
24 and publication of results does not support the assertion that
25 the assessments at issue in this proceeding violate the Kentucky
26 Central Order. The certainty sought by the Director with his
27 direction that the assessments at issue be recalculated has been
28 achieved. The figures used to calculate the assessments are all

1 public information capable of being verified by the Petitioners
2 and any other interested person. The Director also rejects the
3 Petitioners' characterization of the assessments as
4 "retroactive." Instead, the assessments represent the
5 application of the Legislature's prescribed formula to these
6 Petitioners in accordance with already existing historical and
7 antecedent facts.

8 37. Commonwealth urges that the application of the
9 uniform Survey Method to develop the formula used to calculate
10 its retaliatory tax obligation yields a skewed result. In
11 support of this argument, Commonwealth contends that Kentucky
12 municipalities may only assess taxes against the first year
13 premiums received in a policy's first year but not renewal
14 premiums. Thus, Commonwealth argues that the inclusion of its
15 entire premium receipts to calculate its retaliatory tax
16 obligation results in an overstatement of the premium subject to
17 retaliation.

18 38. In making this argument, Commonwealth appears to
19 have assumed that the formula used by the Department to calculate
20 Commonwealth's retaliatory tax liability accounted for the first
21 year premium issued differently for Arizona companies than for
22 Commonwealth. Commonwealth's premium receipts have been treated
23 and considered in the same fashion as Arizona domiciled insurers'
24 premium receipts have been treated.

25 39. If any skewing occurs under the Survey Method, the
26 skewing leads to an understatement of the tax burden faced by
27 Arizona's domiciled insurers. Under Kentucky law, if a
28 municipality imposes any tax, this tax can be imposed against

1 first year premium. If an insurer has no first year premium, no
2 tax would be imposed, regardless of whether the insurer receives
3 renewal premium. The Survey Method calculates Kentucky's
4 municipal tax rate based upon total premium receipts, placing
5 municipal taxes in the numerator (imposed only on first year
6 premium) and all premium in the denominator (first year plus
7 renewal premium). To the extent that Arizona insurers receive
8 any renewal premium in Kentucky, those receipts will decrease the
9 calculated impact of Kentucky's overall municipal tax rate. The
10 application of this formula to all of Commonwealth's Arizona
11 premium (first year plus renewal) results in the application of
12 equalized tax burdens upon insurers from Kentucky transacting
13 business in Arizona.

14 40. The parties have stipulated to the premium subject
15 to retaliation for Travelers. As pointed out by the parties, a
16 computational error in the application of the formula to
17 Travelers' premium occurred. The occurrence of this error, which
18 has since been remedied, does not constitute a defect in the
19 retaliatory tax assessment and mechanism.

20 41. Petitioners' challenge the application of
21 different statutes of limitation to calculate their retaliatory
22 tax liabilities. The Department seeks to impose the applicable
23 period limitations from the state in which each Petitioner is
24 domiciled. In support of this position, the Department urges
25 that the choice of law analysis applicable to retaliatory tax
26 obligations requires the application of a burden equal to the
27 burden faced by Arizona insurers face: a five year period of
28 limitations in Kentucky and a seven year period of limitations in

1 Georgia. If the Department were to apply Arizona law rather than
2 the law to which Arizona insurers are subject in the Petitioners'
3 domiciliary jurisdictions, no period of limitations would be
4 applicable. Arizona law prescribes no period of limitations for
5 the collection of premium taxes on retaliatory taxes. A.R.S.
6 §12-550.

7 42. The Petitioners urge that the application of
8 different limitations periods denies them equal protection under
9 the Arizona constitution. The Petitioners have not articulated
10 how the application of a period of limitations more advantageous
11 than A.R.S. §12-550 constitutes a denial of equal protection.
12 Further, the Department's treatment of these differently situated
13 Petitioners in a manner that serves to equalize the burdens faced
14 by Arizona insurers in the Petitioners' domiciliary jurisdictions
15 serves the purpose articulated by the Supreme Court in Pacific
16 Mutual.

17 43. The Petitioners also urge the Department has
18 abused its discretion and acted in an arbitrary and capricious
19 manner through the application of different limitations periods
20 to each of the Petitioners. In another context, the Department
21 has been instructed to apply the due date prescribed by an
22 insurer's domiciliary state to determine when a tax is due.
23 Pacific Mutual, 97 Ariz. 18, 23, 396 P.2d 253. Incidentally,
24 the application of statutes of limitations does not serve to
25 create liabilities. Rather, the operation of a limitations
26 period serves to extinguish liabilities. This result follows
27 from the Legislature's directive "to give 'even handed treatment'
28 in accordance with the design and purpose of" A.R.S. §20-230.

1 Pacific Mutual, 97 Ariz. at 22-23, 396 P.2d at 253. The
2 Director therefore rejects Petitioners' challenge to the
3 application of the Georgia and Kentucky statutes of limitation to
4 these proceedings.

5
6 E. Conclusions Regarding the Petitioners' Outstanding
Retaliatory Tax Liability

7 44. Petitioners Commonwealth Life Insurance Company,
8 First General Insurance Company, and The Travelers Indemnity
9 Company of America received notice of this proceeding as
10 prescribed by A.R.S. §§20-163 and 41-1061.

11 45. The Director has jurisdiction over this matter
12 pursuant to A.R.S. §§20-142 and 20-230.

13 46. For the years at issue in this proceeding,
14 Commonwealth owes \$217,747.66.

15 47. For the years at issue in this proceeding, First
16 General owes \$473,060.52.

17 48. For the years at issue in this proceeding,
18 Commonwealth owes \$217,747.66.

19 49. For the years at issue in this proceeding,
20 Travelers owes \$312,046.88.

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28 ORDER


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IT IS ORDERED:

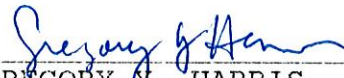
1. Within 35 days from the date of this Order, the following retaliatory tax obligations shall be paid to the Department:

- a. Commonwealth Life Insurance Company \$ 217,747.66.
- b. First General Insurance Company \$ 473,060.52.
- c. The Travelers Indemnity Company
of America \$ 312,046.88.

EFFECTIVE this 8th day of March, 1995.



CHRIS HERSTAM
Director of Insurance



GREGORY G. HARRIS
Chief Administrative Law Judge

NOTIFICATION OF RIGHTS

The aggrieved party may request a rehearing with respect to this Order by filing a written petition with the Administrative Law Division within 30 days of the date of this Order, setting forth the basis for such relief pursuant to A.A.C. R4-14-114(B).

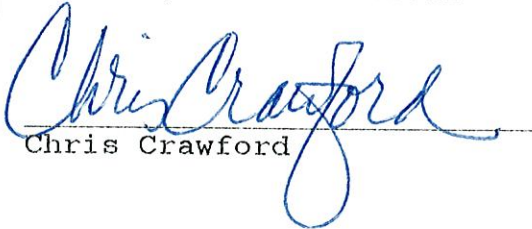
The final decision of the Director may be appealed to the Superior Court of Maricopa County for judicial review pursuant to A.R.S. §20-166.

1 COPY of the foregoing mailed/delivered
2 this 8th day of March, 1995, to:

3 Gay Ann Williams, Deputy Director
4 Charles R. Cohen, Executive Assistant Director
5 Gary Torticill, Assistant Director
6 Kelly McKay, Deputy Assistant Director
7 Brian Stephan, Auditor
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21 Chris Crawford

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