

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION**

**BIGFOOT CO-OP A INC., DBA
MADISON AVENUE APARTMENTS,**

Plaintiff,

VS.

**NATIONWIDE MUTUAL
INSURANCE COMPANY,**

Defendant,

Case No. 2:23-cv-1016

**APPENDIX IN RESPONSE TO
DEFENDANT’S MOTION FOR
SUMMARY JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff, Bigfoot Co-Op A Inc., DBA Madison Avenue Apartments (“Plaintiff”), and submits this Appendix pursuant to Local Rule 56(a)(4) in response to Defendant’s Motion for Summary Judgment.

Michael E. Cooper, AT0015843
Email: mcooper@hodgefirm.com
Shaun W. Hodge, AT0015596
Email: shodge@hodgefirm.com
THE HODGE LAW FIRM, PLLC
1301 Market Street
Galveston, Texas 77550
Telephone: (409) 762-5000
Facsimile: (409) 763-2300

Harley C. Erbe, AT0002430
ERBE LAW FIRM
2501 Grand Avenue
Des Moines, Iowa 50312
Telephone: (515) 281-1460
Facsimile: (515) 281-1474
E-Mail: harleyerbe@erbelaw.com

**ATTORNEYS FOR PLAINTIFF
BIGFOOT CO-OP A INC., DBA
MADISON AVENUE APARTMENTS**

CERTIFICATE OF SERVICE

Plaintiff hereby certifies that a true and correct copy of the foregoing instrument was served upon all counsel of record via the Court's CM/ECF electronic filing system on this 22nd day of March, 2024.

Alex E. Grasso, AT0011862 2700
HOPKINS & HUEBNER, P.C.
Grand Avenue, Suite 111
Des Moines, IA 50312
Telephone: 515-244-0111
Facsimile: 515-244-8935
Email: agrasso@hhlawpc.com

**ATTORNEY FOR DEFENDANT
NATIONWIDE MUTUAL INSURANCE
COMPANY**

By: /s/ Michael E. Cooper
Michael E. Cooper

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RESPONSE EXHIBIT A

STATE OF FLORIDA

COUNTY OF Charlotte

AFFIDAVIT


PERSONALLY CAME AND APPEARED BEFORE ME, notary public in and for the aforesaid county and State, Gregory Ladehoff, and provides the following testimony under oath to be considered before the Court:

1. My name is Gregory Ladehoff. I am over eighteen (18) years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts stated herein.
2. I am the owner of Bigfoot Co-Op A, Inc., doing business as (dba) Pine Terrace Apartments, specifically the properties located at 2265, 2269, 2271, 2279, 2281, 2285, and 2289 Chaney Road, Dubuque, Iowa 52001, as well as two storage buildings located within the vicinity of the properties.
3. On or around August 9, 2021, a severe storm that produced hail and wind struck the Properties.
4. I had purchased various insurance policies to cover the Properties from my insurance company, Nationwide Mutual Insurance Company. The policy number for the Pine Terrace property and claim was ACP CPO13096479372.
5. In the days following the storm, I notified my insurance agent, Julie Bray, that I need a copy of the policies for Pine Terrace and all my other properties to file a claim for damage to the storm. My wife and I own several different properties, all covered under different insurance policies, and I needed to know which policy covered Pine Terrace so I could pursue a claim for that damage.
6. Julie Bray repeatedly stated that she would provide copies of the Policy, as well as all insurance policies covering all of our properties, once she received them. She insisted that Nationwide's system had changed, and that she was unable to receive copies to provide to me. (Please see the text conversation with Julie Bray, **Exhibit A**).
7. On April 1, 2023, I signed an agreement granting an assignment of benefits of this claim to Pinnacle Roofing Consultants ("Pinnacle"). **Exhibit B**. Pinnacle thereafter acted on my behalf in corresponding with Nationwide to receive a copy of the Policy to no avail.

RESPONSE EXHIBIT A

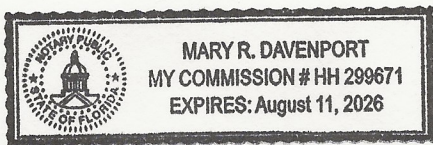
8. After months of repeated efforts, my wife and I, frustrated with Julie Bray's and Nationwide's failure to cooperate with our reasonable request, retained Semper Fi Public Adjusters to represent us in filing this claim.
9. Nationwide finally produced the Policy we had repeatedly sought to Semper Fi. Semper Fi successfully provided notice of our claim to Nationwide, and this lawsuit ensued.
10. In sum, my wife and I did our due diligence in seeking the information we needed to provide Nationwide with notice of the claim we wished to file regarding damage to Pine Terrace from shortly after the storm on August 9, 2021 and the eventual filing of the claim in April 2023.

Further, Affiant sayeth not.



Gregory Ladehoff

SWORN TO AND SUBSCRIBED before me by Gregory Ladehoff on this 20th
day of March, 2024.

(SEAL)





Notary Public in and for the State of Iowa 

My Commission Expires: 08/11/2026

RESPONSE EXHIBIT A

Michael Cooper

From: John Groves <johnneeg10@yahoo.com>
Sent: Wednesday, March 20, 2024 9:09 AM
To: Michael Cooper
Subject: Fw: Roof at Westland Manor

Michael -

Please see below -

Respectfully,

John Groves
563.579.7299
Pinnacle Roofing Consultants

----- Forwarded Message -----

From: Mechelle Ladehoff <mechelleladehoff@gmail.com>
To: John Groves <johnneeg10@yahoo.com>
Sent: Tuesday, March 19, 2024 at 05:03:50 PM CDT
Subject: Fwd: Roof at Westland Manor

Communication with Carol Copeland, myself and Julie Bray.

Begin forwarded message:

From: Julie Bray <jlbray@acroot.net>
Subject: RE: Roof at Westland Manor
Date: November 11, 2022 at 10:36:30 AM EST
To: Mechelle Ladehoff <mechelleladehoff@gmail.com>
Cc: Carol Copeland <ccexecmgt1@aol.com>

I am responding to the estimate I received yesterday. I have to say in my 33 years of employment I have NEVER seen anything like it. The roofer did not even put your name on the estimate.

I would never use this individual even if it was free. I am trying to figure out a way to get someone up there to look at the roof. It cannot be an adjuster. We do not know for sure if there is damage to the roof and I don't want to turn in a "maybe" claim. I will call some of my contractor friends to see if they know of roofers in that area.

Sorry. I just know that insurance carriers are not nice any more especially with roofs. I also will call the city assessor to see if I can determine how old the roof is.

I will get back to you next week.

Thank you,
The A.C. Root Agency, Inc.
Julie

RESPONSE EXHIBIT A

From: Mechelle Ladehoff <mechelleladehoff@gmail.com>
Sent: Thursday, November 10, 2022 7:55 AM
To: Julie Bray <jlbray@acroot.net>
Subject: Fwd: Roof at Westland Manor

Julie,
Carol sent this yesterday. Let me or Greg know what you think.

Mechelle Ladehoff

Begin forwarded message:

From: Mechelle Ladehoff <mechelleladehoff@gmail.com>
Date: November 9, 2022 at 5:39:37 PM CST
To: Carol Copeland <ccexecmgt1@aol.com>
Subject: Re: Roof at Westland Manor

Thank you for this information and forms. We will touch base with Julie Bray and let you know.

Mechelle Ladehoff

On Nov 9, 2022, at 4:25 PM, Carol Copeland <ccexecmgt1@aol.com>
wrote:

Dear Michelle and Greg,

This company is the only roofer to say they can get the Westland job done with insurance money yet this season. They sent these forms for me to sign but, I don't feel comfortable signing anything when I haven't done business with. They assure me they can get the insurance to pay for it.

Please read and let me know which way to go.

Carol

Carol Copeland, Broker
Executive Management & Real
Estate Ltd. 563-556-1605
1330 Locust, Dubuque, IA.
Serving: Dubuque, Davenport,
Bettendorf, Muscatine, Cedar Rapids &
Burlington, Iowa
Licensed In IOWA
execmgtltd.com

5:30

RESPONSE EXHIBIT A



Julie >



Dec 20, 2022 at 12:29 PM

Just left an office voicemail with what I called for but just in case: Greg wants you to email copies of apartment policies to me. 😊

Ok it's nuts her right now. Will get to you asap

Which ones

Might as well do all when possible

Or everything but Penn place

They will be huge and I have to order them. Hope to get tomorrow

Is something wrong



iMessage



AFFIDAVIT EXHIBIT A

5:31

RESPONSE EXHIBIT A



Julie >



No it is so dumb. Of course they changed the damn computer program Dec 1. I am sure it's a programming issue they will fix. I like paper anyway. It's just the policy forms that are like 144 pages. I am printing on both sides so it's not massive

I am not bitching. It's my job I just am sorry I am delayed



Jan 10, 2023 at 10:22 AM

When do you leave to Goose Barn today. Yesterday turned into a shit show because



iMessage



AFFIDAVIT EXHIBIT A



Julie >



Tue, Apr 11 at 2:25 PM

I do need the policy that covers:
Bigfoot Co-op B Westland Manor at 507 Vernon St
AND
Bigfoot Vernon Co-op Westland Village at 517 Vernon St
Wouldn't it be easier on you to call Nationwide and just have them email it to me? Then you don't have to waste a day and stress. Here is my email:
mchelleladehoff@gmail.com

It is not wasting a day. It's my job and I love you guys. I will get it done I promise. I will call 1-800 cubicle idiots now.



iMessage



5:33

RESPONSE EXHIBIT A



Julie >



Wed, Apr 12 at 10:51 AM

Just emailed you and Carol
507 and 517

Ok thank you!

Thu, Apr 13 at 9:47 AM

So where do we stand
today?

Call me please

Will in a little bit in a Dr
office right now

Ok Nationwide made a
change and it should
download today. I sat on
hold 2 hours before
someone answered the
number and contact you
gave me. Then it was a



iMessage



AFFIDAVIT EXHIBIT A

5:33

RESPONSE EXHIBIT A



Julie >



Ok Nationwide made a change and it should download today. I sat on hold 2 hours before someone answered the number and contact you gave me. Then it was a new business underwriter. It should be fine now, but I would like to talk to you

Greg is getting a procedure done this morning (no worry) so I will try to call later

Ok 🙏 for a simple procedure

Fri, Apr 14 at 11:47 AM

Please call me. I am trying to tell you when I added the two buildings the wind



iMessage



AFFIDAVIT EXHIBIT A

5:33

RESPONSE EXHIBIT A



Julie >



Fri, Apr 14 at 11:47 AM

Please call me. I am trying to tell you when I added the two buildings the wind hail deductible defaulted to 2% which would be \$500,000. They are supposed to be changing it back to \$10,000 like it should be. DO NOT do anything until this is fixed.

I'm an appt will call in about an hour

Fri, Apr 14 at 1:04 PM

It's ok! I passed this info along and made sure nothing gets done regarding this right away. Busy day yesterday so didn't call back. All is fine



iMessage



AFFIDAVIT EXHIBIT A

JB

Julie >

Fri, Apr 14 at 1:04 PM

It's ok! I passed this info along and made sure nothing gets done regarding this right away. Busy day yesterday so didn't call back. All is fine with Greg but just busy. Maybe just keep me posted when you think this is taken care of?

Will do. Sorry I missed your call. I was with another client. I would like to talk to you though. So call me whenever. I am sorry I was short with you the other day. I don't like it when someone is mad at me. Wendy didn't get Covid as bad so I am much better. I worry about everyone. Mike's knee has been



iMessage



5:33

RESPONSE EXHIBIT A



Julie >



Will do. Sorry I missed your call. I was with another client. I would like to talk to you though. So call me whenever. I am sorry I was short with you the other day. I don't like it when someone is mad at me. Wendy didn't get Covid as bad so I am much better. I worry about everyone. Mike's knee has been horrible so I am more stressed than normal. Nationwide's computer system is horrible. They changed it and it is so complicated no one likes it. Thank you for being you. I appreciate and love all of you ❤️

Mon, May 1 at 10:14 AM



iMessage



AFFIDAVIT EXHIBIT A

5:34

RESPONSE EXHIBIT A



Julie >



Mon, May 1 at 10:14 AM

I tried to respond to your email but your server rejected it. I am calling nationwide right now. I will let you know

Mon, May 22 at 9:54 AM

Julie I still am in immediate need of our policy. Nationwide did not make it available online in its entirety and when they just sent another email link last week it is not accessible as their website has a glitch and has for a few months. Would you please get me a paper copy by the end of this week? I am in need of it to get anything accomplished we have been working on.



iMessage



AFFIDAVIT EXHIBIT A



Julie >



Mon, May 22 at 9:54 AM

Julie I still am in immediate need of our policy. Nationwide did not make it available online in its entirety and when they just sent another email link last week it is not accessible as their website has a glitch and has for a few months. Would you please get me a paper copy by the end of this week? I am in need of it to get anything accomplished we have been working on.

I have been trying equally hard as you have. Nationwide changed their system and it's a mess. Right now the last two properties have wind hail deductibles of \$150,000



iMessage





Julie >



I have been trying equally hard as you have. Nationwide changed their system and it's a mess. Right now the last two properties have wind hail deductibles of \$150,000 plus instead of \$10,000. I have contacted them everyday and underwriting says it's \$10,000 but claims says it's the other. New business has a 2% deductible. That is a real issue right now. I promise you I will try again. This is not me, is the new insurance world. 1-800-cubicle idiots. Calling now!

Mon, Jun 5 at 10:04 AM

Good Morning! Need to cancel the auto policy that



iMessage



RESPONSE EXHIBIT A

PHG INC
136 36TH STREET DRIVE SE, SUITE A1
CEDAR RAPIDS, IA 52403

ASSIGNMENT OF CLAIM AND BENEFITS

This Assignment of Claim (the "Agreement") is made and effective this 1st day of APRIL 2023, BETWEEN: Bigfoot Co-Op A INC (the 'Assignor'), an entity in possession of a claim for damages and other considerations at the address of 2261 Chaney Road, Dubuque, IA 52001 AND: PHG INC (the 'Assignee'), a limited liability company organized and existing under the laws of the State of Iowa with its head office located at: 136 36TH Street Drive SE, Suite A1, Cedar Rapids, IA 52403.

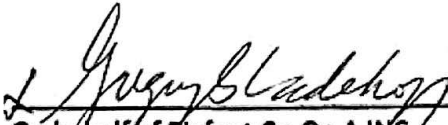
FOR ACTUAL VALUE RECEIVED, the Assignor hereby sells and transfers to the Assignee and its successors, assigns and personal representatives, any and all claims, demands and causes or future causes of action of any kind whatsoever which the undersigned has or may have against Nationwide Insurance Company, its affiliates, underwriters, or 3rd party claims adjusters including but not limited to Nationwide Insurance Company for following type and form of claim:

Weather Related Event and Damage to property, located 2261 Chaney Road, Dubuque, IA 52001. Described internally by Nationwide Insurance Company as claim # _____ under Policy # ACP CG013096479372, with a date of loss of 8/10/21.


And the undersigned may in its own name and for its own benefit prosecute, collect, settle, compromise and grant releases on said claim as it chooses and in its sole discretion deems advisable.

IN WITNESS WHEREOF, the parties have executed this Assignment, in the absence of duress or any other agreements, on the date written below.

DATED THIS 1 day of APRIL 2023.



On behalf of Bigfoot Co-Op A INC



On behalf of PHG INC

RESPONSE EXHIBIT B



Certification

I, DEBBIE ALLISON, as a duly authorized NATIONWIDE ASSURANCE associate entrusted with oversight of the system of record from which this copy was produced, based upon information and belief; certify under the penalty of perjury that this attached copy of ACP CP013077572448 effective 02/01/2023 to 02/01/2024 issued to LADEHOFF FAMILY RETIREMENT ACCOUNT LLC was made at or near the time of certification, as part of regularly conducted business activities, and is a true and accurate copy of the official record kept as part of regular business activities.

Debbie Allison
boxSIGN 17723RV1-4QYVYXW

Sep 25, 2023

Debbie Allison

Date

Director, Process Management

RESPONSE EXHIBIT B



NATIONWIDE
ONE WEST NATIONWIDE BLVD
COLUMBUS, OH 43215-2220
1-877 On Your Side
1 (877) 669-6877

Nationwide®

COMMERCIAL PORTFOLIO ACP 3007572448

ACCOUNT NUMBER

ACP 3007572448

BILLING ACCOUNT NUMBER

812668414

LADEHOFF FAMILY RETIREMENT ACCOUNT, LLC
PO BOX 260
DEWITT, IA 52742-0260

PLEASE KEEP THIS FOR YOUR RECORDS

We are pleased to serve your business insurance needs. Our company is committed to providing you high quality insurance protection and superior service.

If you should have any questions about your insurance portfolio or if you wish to make a change to your policy, please contact your agent.

IMPORTANT INFORMATION ABOUT YOUR POLICY

Please spend a few minutes to read and understand your policy. Some items to which you should pay special attention are as follows:

- **Special Required State Notices.** These notices, when included, point out specific items concerning your policy. We urge you to read them.
- **Declarations Page.** This shows such information as your name, address, the coverages provided, the policy term, policy limits, list of coverages forms, premium amounts, and other individualized information.
- **Coverage and Endorsement Forms.** This is the section of your policy which provides policy and coverage information. Please read it carefully.

45071000302013



Your Commercial Insurance Portfolio

Courtesy of:

Agency: THE A.C. ROOT AGENCY, INC.
 Agency Number: 03163
 Region Code: 043
 Agency Address: PO BOX 307
 CLINTON, IA 52733-0307
 Agency Phone Number: (563) 242-2454

INSURED COPY

IA 03163

Nationwide Mutual Insurance Company and Affiliated Companies, One Nationwide Plaza, Columbus, Ohio 43215-2220
nationwide.com. Nationwide, the Nationwide N and Eagle and Nationwide is on your side are service marks of Nationwide Mutual Insurance Company © 2017 Nationwide

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RESPONSE EXHIBIT B



NATIONWIDE
ONE WEST NATIONWIDE BLVD
COLUMBUS, OH 43215-2220
1-877 On Your Side
1 (877) 669-6877

COMMERCIAL PACKAGE SUMMARY

PRINTED 11-28-2022

Account Number: ACP 3007572448
Named Insured: LADEHOFF FAMILY RETIREMENT
ACCOUNT, LLC
Mailing Address: PO BOX 260
DEWITT, IA 52742-0260
Agency: THE A.C. ROOT AGENCY, INC.
Agency Number: 03163
Region Code: 043
Agency Address: PO BOX 307
CLINTON, IA 52733-0307
Agency Phone Number: (563) 242-2454



Premiums/Fees

Total Account Premium \$14,465.00

| Line of Business | Premium |
|---------------------|-------------|
| Commercial Property | \$13,470.00 |
| General Liability | \$995.00 |

45071000302022



INSURED COPY

IA 03163

Not a bill. Your bill is sent separately.

This Commercial Package is a portfolio of individual policies which serves to combine various insurance coverages written under a group of separate contracts of insurance.

RESPONSE EXHIBIT C



NATIONWIDE INSURANCE COMPANY OF AMERICA
 (A STOCK COMPANY)
 ONE WEST NATIONWIDE BLVD
 COLUMBUS, OH 43215-2220
 1-877 On Your Side
 1 (877) 669-6877

RENEWAL

COMMERCIAL GENERAL LIABILITY COMMON DECLARATIONS

Policy Number: ACP CG013096479372
 Named Insured: BIGFOOT CO-OP A INC - DBA MADISON AVENUE APARTMENTS
 Mailing Address: 1330 LOCUST ST
 DUBUQUE, IA 52001-4711
 Agency: THE A.C. ROOT AGENCY, INC.
 Address: PO BOX 307
 CLINTON, IA 52733-0307
 Agency Phone: (563) 242-2454
 Policy Period: Effective From 12-20-2022 To 12-20-2023
 12:01 AM Standard Time at the insured's mailing address.
 The Insured is a(n): Corporation



Premium/Fees

| | |
|----------------------|------------|
| Total Annual Premium | \$5,573.00 |
| Total Policy Premium | \$5,573.00 |

Limits Of Insurance - Premises/Operations and Products/Completed Operations

| | Limit | Deductible |
|---|----------------------------|------------------------|
| Each Occurrence Limit | Per Occurrence | \$1,000,000 |
| Personal and Advertising Injury Limit | Per Person Or Organization | \$1,000,000 |
| General Aggregate Limit | All Occurrences | \$2,000,000 |
| Products/Completed Operations Aggregate Limit | All Occurrences | \$2,000,000 |
| Damage To Premises Rented To You Limit | Per Occurrence | \$100,000 |
| Medical Payments Limit | Per Person | \$5,000 |
| Premises/Operations BI Deductible | | No Deductible |
| Premises/Operations PD Deductible | | \$5,000 Per Occurrence |
| Premises/Operations BI and PD Deductible | | No Deductible |
| Products/Completed Operations BI Deductible | | No Deductible |
| Products/Completed Operations PD Deductible | | \$5,000 Per Occurrence |

44241000140169



INSURED COPY

IA 03163

RESPONSE EXHIBIT C



Nationwide®

COMMERCIAL GENERAL LIABILITY

SCHEDULE(S)

| | | | |
|--|--------------------|----------------|-------------------------------|
| Policy Number: | ACP CG013096479372 | Policy Period: | From 12-20-2022 To 12-20-2023 |
| Limits Of Insurance - Premises/Operations and Products/Completed Operations | | Limit | Deductible |
| Products/Completed Operations BI and PD Deductible | | | No Deductible |
| Coverage Form | Occurrence | | |



RESPONSE EXHIBIT D



Certification

I, DEBBIE ALLISON, as a duly authorized NATIONWIDE MUTUAL INSURANCE COMPANY associate entrusted with oversight of the system of record from which this copy was produced, based upon information and belief; certify under the penalty of perjury that this attached copy of ACP CP013096479372 effective 12/20/2022 to 12/20/2023 issued to BIGFOOT CO-OP A INC was made at or near the time of certification, as part of regularly conducted business activities, and is a true and accurate copy of the official record kept as part of regular business activities.

Debbie Allison
boxSIGN 17723RV1-1XV8LLQL

Jul 13, 2023

Debbie Allison

Date

Director, Process Management

RESPONSE EXHIBIT D



NATIONWIDE
ONE WEST NATIONWIDE BLVD
COLUMBUS, OH 43215-2220
1-877 On Your Side
1 (877) 669-6877

Nationwide®

COMMERCIAL PORTFOLIO ACP 3006479372

ACCOUNT NUMBER

ACP 3006479372

BILLING ACCOUNT NUMBER

995279933

BIGFOOT CO-OP A INC
DBA MADISON AVENUE APARTMENTS
1330 LOCUST ST
DUBUQUE, IA 52001-4711

PLEASE KEEP THIS FOR YOUR RECORDS

We are pleased to serve your business insurance needs. Our company is committed to providing you high quality insurance protection and superior service.

If you should have any questions about your insurance portfolio or if you wish to make a change to your policy, please contact your agent.

IMPORTANT INFORMATION ABOUT YOUR POLICY

Please spend a few minutes to read and understand your policy. Some items to which you should pay special attention are as follows:

- **Special Required State Notices.** These notices, when included, point out specific items concerning your policy. We urge you to read them.
- **Declarations Page.** This shows such information as your name, address, the coverages provided, the policy term, policy limits, list of coverages forms, premium amounts, and other individualized information.
- **Coverage and Endorsement Forms.** This is the section of your policy which provides policy and coverage information. Please read it carefully.

44241000140012



Your Commercial Insurance Portfolio

Courtesy of:

Agency: THE A.C. ROOT AGENCY, INC.
 Agency Number: 03163
 Region Code: 043
 Agency Address: PO BOX 307
 CLINTON, IA 52733-0307
 Agency Phone Number: (563) 242-2454

INSURED COPY

IA 03163

Nationwide Mutual Insurance Company and Affiliated Companies, One Nationwide Plaza, Columbus, Ohio 43215-2220
nationwide.com. Nationwide, the Nationwide N and Eagle and Nationwide is on your side are service marks of Nationwide Mutual Insurance Company © 2017 Nationwide

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RESPONSE EXHIBIT D



NATIONWIDE
ONE WEST NATIONWIDE BLVD
COLUMBUS, OH 43215-2220
1-877 On Your Side
1 (877) 669-6877

COMMERCIAL PACKAGE SUMMARY

PRINTED 11-07-2022

Account Number: ACP 3006479372
Named Insured: BIGFOOT CO-OP A INC - DBA
MADISON AVENUE APARTMENTS
Mailing Address: 1330 LOCUST ST
DUBUQUE, IA 52001-4711
Agency: THE A.C. ROOT AGENCY, INC.
Agency Number: 03163
Region Code: 043
Agency Address: PO BOX 307
CLINTON, IA 52733-0307
Agency Phone Number: (563) 242-2454



Premiums/Fees

Total Account Premium \$86,165.00

| Line of Business | Premium |
|----------------------|-------------|
| Commercial Property | \$70,977.00 |
| Commercial Umbrella | \$2,963.00 |
| General Liability | \$5,573.00 |
| Workers Compensation | \$6,652.00 |

Not a bill. Your bill is sent separately.

This Commercial Package is a portfolio of individual policies which serves to combine various insurance coverages written under a group of separate contracts of insurance.

44241000140021



INSURED COPY

IA 03163