



June 19, 2023

Ms. Shiva Frentzen  
Executive Officer  
El Dorado Local Agency Formation Commission  
550 Main Street, Suite E  
Placerville, California 95667

RE: 2023-24 Property/Liability Program Renewal Invoice

Dear Ms. Frentzen,

We sincerely appreciate your patience while the program reinsurers finalized the 2023-24 renewal costs for the SDRMA Property/Liability Program over the past few months. As expected, the program final renewal costs have been impacted by the challenging conditions of the current insurance market.

The initial program renewal estimates were projected to be a 15%-20% increase in early 2023. Since then, the market renewal pricing for public entities are increasing between 35-70% due to global losses, natural disasters, inflation and limited carriers providing coverage within the state of California. The American Property Casualty Insurance Association (APCIA) announced the United States Property & Casualty Insurers are facing the hardest market in a generation with the following Inflation and Financial Results:

- 2022 was the eighth consecutive year where the U.S. suffered at least 10 catastrophes causing over a billion dollars in losses.
- A.M. Best noted auto and homeowners incurred an estimated underwriting loss of \$34.9 billion in 2022, nearly tripling the prior-year level and driving an industry five-year high underwriting loss.
- The price of residential home construction materials have climbed 33.9% since the start of the pandemic, while trade services are up 27 percent.
- The U.S. property casualty insurance industry's policyholder surplus fell 9.4% in 2022, according to A.M. Best, and is likely to be the largest drop since early 2009, according to S&P.

Given these difficult market conditions and challenging renewal terms, in addition to your agency's loss experience, scheduled item changes, budget updates and exposure changes that were reported to SDRMA since July 1, 2022, your agency may see an increase greater than the estimated 15-20%.

Your agency's 2023-24 Property/Liability Program renewal invoice is now available on MemberPlus Online™ as an attachment to this letter. If your agency has an insurance broker for property/liability coverage, you may receive a separate invoice from your broker agency.



Your invoice may include the following adjustments:

- The annual contribution for the Property/Liability Package Program may vary compared to the 2022-23 renewal invoice due to scheduled item changes, updates submitted through the renewal questionnaire, and any optional coverages selected by your agency.
- The Limit of Liability selected by your agency is also indicated on the invoice.
- For members belonging to both SDRMA Property/Liability and Workers' Compensation Programs, a 5% Multi-Program Discount has been deducted from the invoice total.
- Credit Incentive Program (CIP) discounts, if earned, have been applied to your invoice.
- In addition, a \$75 credit has been applied if your agency used MemberPlus Online™ to submit your 2023-24 Renewal Questionnaire by the February 15 deadline.
- No Longevity Distribution is declared for the Property/Liability Program this year.

To ensure accurate and timely processing of your coverages, **please submit payment for the total contribution amount shown on the invoice by July 15, 2023.** If you would like to receive a hard copy invoice, please contact us at [memberplus@sdrma.org](mailto:memberplus@sdrma.org) or 800-537-7790.

Please note that any balance due on **August 15, 2023** will begin to accrue interest charges of 1% per month regardless of any payment arrangements.

From the SDRMA Board of Directors and entire risk management team, we thank you for your continued partnership! If you have any questions, please contact us at [memberplus@sdrma.org](mailto:memberplus@sdrma.org) or 800-537-7790.

Sincerely,  
Special District Risk Management Authority

A handwritten signature in cursive script that reads "Brian Kelley".

Brian Kelley  
Chief Executive Officer

Attachments: 2023-24 PL Renewal Invoice  
2023-24 CIP Criteria

**Property/Liability Package Program Invoice**

**Program Year 2023-24**

**El Dorado Local Agency Formation Commission**

550 Main Street, Suite E  
Placerville, California 95667

Invoice Date: 06/19/2023  
Invoice Number: 73813  
Member Number: 7350

Property, Boiler/Machinery, Pollution, Cyber <i>Coverage for 1 reported item(s) valued at (including contents): \$85,572</i>	\$446.59
Mobile/Contractors Equipment <i>Coverage for 0 reported item(s) valued at: \$0</i>	0.00
General Liability*, Errors & Omissions, Employee & Public Officials Dishonesty <i>Certificates: 1 Non-Member Certificate(s)</i>	17,002.82
Auto Liability (includes \$50 charge for non-owned auto coverage) <i>Coverage for 0 reported item(s) valued at: \$0</i>	50.00
Auto Comp / Collision <i>Coverage for 0 reported item(s) valued at: \$0</i>	0.00
Trailers <i>Coverage for 0 reported item(s) valued at: \$0</i>	0.00

<b>Gross Package Contribution</b>	<b>\$17,499.41</b>
Earned CIP Credits (7)	-410.83
Longevity Distribution Credit	0.00
MemberPlus Online RQ Bonus	-75.00
Other Discounts	0.00
<b>Subtotal</b>	<b>\$17,013.58</b>
<b>5% Multi-Program Discount</b>	<b>-\$850.68</b>

**Total Contribution Amount Due by July 15** **\$16,162.90**

*\*Current Limit of Liability is \$10M for G/L, A/L and E&O (excluding outside excess liability limits)*

Please pay in full by the due date. If not, a late charge of one percent (1%) per month, twelve percent (12%) per annum, will be assessed on all sums past due. Imposition of this charge does not extend the due date for payment.

**Remit Payment to:**

Special District Risk Management Authority  
P.O. Box 15677, Sacramento, California 95852

For invoice questions contact the SDRMA Finance Department at [accounting@sdrma.org](mailto:accounting@sdrma.org) or 800.537.7790

Special District Risk Management Authority  
1112 I Street Suite 300, Sacramento, California 95814-2865  
Tel 916.231.4141 or 800.537.7790 | Fax 916.231.4111

[www.sdrma.org](http://www.sdrma.org)



**LOCAL AGENCY FORMATION COMMISSION**  
550 Main Street, Suite E. Placerville, CA 95667  
(530) 295-2707 · lafco@edlafco.us · www.edlafco.us

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September 14, 2023

Dear Counsel:

On August 7, 2023 ("Received Date"), [El Dorado Local Agency Formation Commission] ("LAFCO") received the claim you presented on behalf of Cari McCormick ("Claimant"), dated June 28, 2023 ("Claim"). The following is LAFCO's response:

**Notice of Return without Action**

**With respect to any event or occurrence which had occurred more than six (6) months and less than one year before the presentation of the Claim, please be advised of the following:**

You are hereby notified that the Claim is being returned because it was not presented within six (6) months after the event or occurrence, as required by law. (See Gov. Code, §§ 901, 911.2.) Because the claim was not presented within the time allowed by law, no action was taken on the claim.

Your only recourse at this time is to apply, without delay, to LAFCO for leave to present a late claim. (See Gov. Code, §§ 911.4-912.2, 946.6.) Under some circumstances, leave to present a late claim will be granted. (See Gov. Code, § 911.6.)

You may seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.

**Notice of One (1) Year Statutory Return of Claim**

**With respect to any event or occurrence which has occurred more than one (1) year before the presentation of the Claim, please be advised of the following:**

The Claim has been reviewed and is being returned to you because it was not presented within one (1) year after the event or occurrence, as required by law. (See Gov. Code, §§ 901, 911.2.)

Because the claim was not presented within the time allowed by law, no action was taken on the claim. (See Gov. Code, § 910, *et seq.*)

You may wish to seek the advice of an attorney of your choice in connection with this matter to determine whether you have any further remedy and/or whether other procedures are open to you. If you desire to consult an attorney, you should do so immediately.

**Notice of Rejection of Claim**

**With respect to any event or occurrence which has occurred within a time period allowed by law, please be advised of the following:**

The Claim has been reviewed. Notice is hereby given that only as to those events or occurrences which may have occurred within a time period as allowed by law, said Claim is rejected.

**WARNING:** Subject to certain exceptions, you have only six (6) months from the date this notice was personally delivered or deposited in the mail to file a court action on claims subject to the Government Claims Act. (See Gov. Code, § 945.6.)

You may wish to seek the advice of an attorney of your choice in connection with this matter. If you desire to consult an attorney, you should do so immediately.

The six-month (6-month) time limit referred to in this notice applies only to causes of action which are governed by the California Tort Claims Act. The notice does not affect or extend any other applicable statute of limitations. Depending on the type of action, a shorter statute of limitations may apply.

**WARNING**

**If you wish to file a court action on this matter, you must first petition the appropriate court for an order relieving you from the provisions of Government Code section 945.4 (claims presentation requirement). (See Gov. Code, § 946.6.) Such petition must be filed with the court within six (6) months from the date your application for leave to present a late claim was denied.**

Please be advised that pursuant to California Code of Civil Procedure sections 128.7 and 1038, LAFCO may seek to recover all legal fees and costs of defense in the event an action is filed in this matter and it is determined that the action was not brought, or continued, in good faith and with reasonable cause.

Sincerely,



Shiva Frentzen  
Executive Officer



June 28, 2023

To Whom It May Concern:

My firm represents Cari McCormick. Enclosed you will find an administrative charge, with exhibits, filed by Ms McCormick with the California Civil Rights Department, naming as respondents the California Public Employees' Retirement System, Lake County, and the State of California.

As the charge explains, Ms McCormick's claims concern how certain pension benefits are calculated and paid through CalPERS. Those claims are brought *on behalf of* a putative class of California public employees ("Plaintiff Class"). Those claims are brought *against* a putative class of California public entity employers who employed one or more members of the proposed plaintiff class ("Defendant Class"). Ms McCormick will propose that the State of California, as represented by the California Attorney General's Office, serve as class representative for the proposed Defendant Class.

We have reason to believe your public entity may have employed one or more members of the proposed Plaintiff Class, because your public entity contracts to pay pension benefits through CalPERS. For that reason, we are serving Ms McCormick's FEHA charge on your public entity pursuant to Government Code section 12962(b). In addition, to the extent the government claim presentation requirements may apply, we hereby present the enclosed charge as a government claim.

For more information, please see the enclosed charge.

Regards,



/s/ Brent A. Robinson

Counsel for Plaintiff Cari McCormick  
[bar@asmlawyers.com](mailto:bar@asmlawyers.com)

Enclosures





Civil Rights Department

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 8, 2023

Brent Robinson  
Aiman-Smith & Marcy, 7677 Oakport Street, Suite 1150  
Oakland, California 94621

RE: **Notice to Complainant's Attorney**  
CRD Matter Number: 202306-20925508  
Right to Sue: McCormick / California Public Employees' Retirement System et al.

Dear Brent Robinson:

Attached is a copy of your complaint of discrimination filed with the Civil Rights Department (CRD) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

**Pursuant to Government Code section 12962, CRD will not serve these documents on the employer.** You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the CRD does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Civil Rights Department



**Civil Rights Department**

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 8, 2023

RE: **Notice of Filing of Discrimination Complaint**

CRD Matter Number: 202306-20925508

Right to Sue: McCormick / California Public Employees' Retirement System et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Civil Rights Department (CRD) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to CRD is requested or required.

Sincerely,

Civil Rights Department





Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

June 8, 2023

Cari McCormick

RE: **Notice of Case Closure and Right to Sue**

CRD Matter Number: 202306-20925508

Right to Sue: McCormick / California Public Employees' Retirement System et al.

Dear Cari McCormick:

This letter informs you that the above-referenced complaint filed with the Civil Rights Department (CRD) has been closed effective June 8, 2023 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this CRD Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Civil Rights Department

1                                   **COMPLAINT OF EMPLOYMENT DISCRIMINATION**  
2                                   **BEFORE THE STATE OF CALIFORNIA**  
3                                   **Civil Rights Department**  
4                                   **Under the California Fair Employment and Housing Act**  
5                                   **(Gov. Code, § 12900 et seq.)**

6 **In the Matter of the Complaint of**

7 Cari McCormick

CRD No. 202306-20925508

8                                   Complainant,

9 vs.

10 California Public Employees' Retirement System  
11 Lincoln Plaza East 400 Q Street Room 1820  
12 Sacramento, CA 95811

13 Lake County  
14 255 North Forbes Street  
15 Lakeport, CA 95453

16 State of California  
17 c/o Attorney General Rob Bonta, Department of  
18 Justice, P.O. Box 944255  
19 Sacramento, CA 94244-2550

20                                   Respondents

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23  
24 **1.** Respondent **California Public Employees' Retirement System** is an **employer** subject to  
25 suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et  
26 seq.).

27 **2.** Complainant is naming **Lake County** business as Co-Respondent(s).  
28 Complainant is naming **State of California** business as Co-Respondent(s).

**3.** Complainant **Cari McCormick**, resides in the City of , State of .

**4.** Complainant alleges that on or about **June 1, 2023**, respondent took the following  
adverse actions:

**Complainant was discriminated against** because of complainant's age (40 and over) and  
as a result of the discrimination was denied equal pay, other.

1 **Additional Complaint Details:** See Exhibits A, B, and C attached hereto.

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1 VERIFICATION

2 I, **Brent A. Robinson**, am the **Attorney** in the above-entitled complaint. I have read  
3 the foregoing complaint and know the contents thereof. The matters alleged are  
4 based on information and belief, which I believe to be true.

5 On June 8, 2023, I declare under penalty of perjury under the laws of the State of  
6 California that the foregoing is true and correct.

7 **San Francisco, CA**

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**EXHIBIT A**



## Exhibit A – Claim Narrative

Plaintiff Cari McCormick is an individual.

Defendants California Public Employees' Retirement System ("CalPERS"), State of California, and County of Lake are California governmental entities.

Plaintiff is ignorant of the true names or capacities of defendants named herein as Does 1 through 3,000, inclusive, and therefore identifies these defendants by these fictitious names. Each of the defendants named herein or designated as a Doe, is liable or in some manner legally responsible for the events alleged herein.

Plaintiff seeks to have the State of California, represented by the California Attorney General's Office, appointed to represent a defendant class, which includes all public entities that both employed one or more Plaintiffs, and are liable for employer-side retirement contributions for one or more Plaintiffs. A list of public entities believed to potentially be included within that defendant class, based on their listing as employers within the 2021-2022 Annual Comprehensive Financial Report published by CalPERS, is attached as Exhibit C.

Plaintiff refers to all defendants here collectively as "Defendants."

Plaintiff seeks to represent a plaintiff class of similarly situated persons. The class includes all persons who were employed by Defendants; who were at or over age 40 at the time they became members of the CalPERS system; who applied for and were granted ordinary disability retirement; whose retirement benefits are administered by CalPERS; and either (1) who have ever received disability retirement benefit payments pursuant to Government Code section 21423, who were over age 41 at membership in CalPERS, and who at retirement were credited with 18.518 or fewer years of actual service; or (2) who have ever received disability retirement benefit payments pursuant to Government Code section 21098, and who at retirement were credited with 24.691 or fewer years of actual service; or (3) who have ever received disability retirement benefit payments pursuant to Government Code section 21424, and who at retirement were credited with 29.629 or fewer years of actual service.

Plaintiff was employed by County of Lake; was over age 40 at membership in CalPERS; applied for and was granted ordinary disability retirement; receives benefits administered by CalPERS; and presently receives monthly disability benefit payments pursuant to one of the sections listed above. *See, generally, McCormick v. Public Employees' Retirement System* (2019) 41 Cal.App.5th 428.

Plaintiff refers to herself and the proposed plaintiff class collectively as "Plaintiffs."

At all relevant times, each of the Defendants was the agent of each of the remaining Defendants and, in doing the things alleged herein, was acting with the course and scope of such agency.

Exhibit A  
Page 2

Each of the Defendants' actions or omissions as alleged herein was ratified by each of the remaining Defendants. Each of the acts or omissions of a Defendant's agents as alleged herein was ratified by that Defendant, as well as by each of the remaining Defendants. Each of the Defendants had knowledge of unlawful discrimination practiced upon its employees by the other Defendants, and failed to thereafter take all reasonable steps to prevent further discrimination against its employees. Each of the Defendants provided substantial assistance or encouragement to the other Defendants in the discrimination alleged here, and thereby caused harm to Plaintiff and the proposed class. Each of the Defendants had knowledge of the discrimination alleged here, and cooperated in that discrimination. For purposes of the discrimination alleged here, each of the Defendants was a joint employer and engaged in a joint venture, including by engaging in a combination of resources to carry out a single undertaking, with each having separate ownership interests in the joint undertaking, joint control, and an agreement to share profits and losses of that joint undertaking.

California law governs Plaintiffs' retirement benefits, and provides for ordinary disability retirement benefits for certain public employees such as Plaintiff who are rendered unable to do their job by any non-industrial long-term disability.

California law calculates such ordinary disability retirement benefits in a way that discriminates based on advanced age at membership. Government Code sections 21098, 21424, and 21423 each provides for younger employees to receive an ordinary disability retirement benefit equal to at least 33.333% of their final compensation. By contrast, older employees receive significantly reduced benefits, because those benefits are based on imputed years of service through age 60. For example, assume two state miscellaneous first-tier employees are otherwise identical, except that one was hired at age 18, the other at age 49. Each puts in 10 years of actual credited service, and each is forced to retire due to disabilities. The 18-year-old-at-hire will receive a benefit equal to 33.333% of his final compensation, because the formula gives him service credit as if he had worked without interruption through age 60. By contrast, the 49-year-old-at-hire will receive a benefit equal to just 19.8% under section 21423, with the difference in benefit amounts solely due to the older employee's advanced age.

Defendants are liable for disparate treatment. Defendants are qualifying employers, and employed Plaintiffs. Plaintiffs were over age 40 at membership. Defendants paid Plaintiffs reduced retirement benefits compared to employees younger at membership. Plaintiffs' age over 40 at membership was a substantial motivating factor in Defendants' determination and payment of the amount of Plaintiffs' disability retirement benefits. Plaintiffs have been harmed. Defendants' payment of reduced benefits to Plaintiffs is a substantial factor in causing them harm.

Defendants are also liable for pattern-or-practice of intentional discrimination. Discrimination is Defendants' standard operating procedure, rather than an unusual practice, and that standard operating procedure is a substantial factor in harming Plaintiffs.

Exhibit A  
Page 3

Defendants are also liable for disparate impact. Defendants are qualifying employers, and employed Plaintiffs. Plaintiffs were over age 40 at membership. Defendants maintained a common policy or practice that has a disproportionate adverse effect on persons over age 40 at membership. Plaintiffs have been harmed. Defendants' policy or practice was a substantial factor in causing Plaintiffs' harm.

Defendants are also liable for their failure to prevent discrimination against Plaintiffs. Defendants knew or should have known of the above-alleged discrimination, and failed to take all reasonable steps necessary to prevent the same from occurring, thereby causing harm to Plaintiffs.

Defendants are also liable for breach of contract. At hiring, Defendants promised Plaintiffs future pay in exchange for present work, and Defendants' monthly retirement benefit payments are wages paid after the fact for Plaintiffs' years of labor. *See, e.g., Kern v. Long Beach* (1947) 29 Cal.2d 848, 850-852. The retirement benefit provisions at issue are contractual terms of class members' employment agreements: by those retirement provisions, Defendants promised class members future pay in exchange for present work, and once class members began performance, class members obtained a vested contractual right to the benefits Defendants had promised. *See, e.g., McGlynn v. State of California* (2018) 21 Cal.App.5th 548, 559.

Defendants maintained express written contractual terms of employment that provided for class members to be paid reduced retirement benefits based on their advanced ages at hiring. *See, Gov. Code §§ 21098, 21424, 21423.* Those terms of employment violate or are contrary to overriding state laws (*i.e.*, Gov. Code § 12940, subd. (a)) regulating such terms of employment, by providing for reduced compensation based solely on an employees' advanced age at hiring. To that extent, those terms of employment are contrary to superseding state law, they are illegal contractual terms, they are contrary to public policy, and they are therefore void. *See, Civil Code § 1667.* The unlawful terms of Plaintiffs' contracts with Defendants are severable, such that the illegal contract terms should be severed, and the balance of the contracts enforced. *Armendariz v. Found. Health Psychcare Servs., Inc.* (2000) 24 Cal.4th 83, 124. With illegal contractual terms severed, class members' contracts with the Defendants provide for class members to receive equal retirement benefits.

Alternately, FEHA's prohibition on age discrimination constitutes a contractual term of employment implied by operation of law into Plaintiffs' employment agreements with Defendants, such that Defendants were subject to a contractual duty to pay nondiscriminatory retirement benefits. *See, Castillo v. Express Escrow Company* (2007) 146 Cal.App.4th 1301, 1308 ("all laws in existence when the agreement was made become part of the contract"); *Anderson v. Time Warner Telecom of California* (2005) 129 Cal.App.4th 411, 418 ("All applicable laws are presumed to be known by the parties and to form a part of the agreement as if those laws were expressly referred to and incorporated."); *Coral Farms, L.P. v. Mahony* (2021) 63 Cal.App.5th 719, 731 ("The incorporation of current law into a contract is presumed and does not require a deliberate expression by the parties.").



Exhibit A  
Page 4

The terms of Plaintiffs' employment contracts were sufficiently clear that the parties could understand what each was required to do, the parties exchanged consideration, and the parties agreed to terms. Plaintiffs did all, or substantially all, of the significant things their contracts required of them. Defendants failed to pay non-discriminatory benefits under the contracts, or paid discriminatory benefits in violation of the contracts. Plaintiffs were harmed. Defendants' breaches of contract were a substantial factor in causing Plaintiffs' harm.

The harm to Plaintiffs includes the loss of retirement benefits, the loss of additional amounts of money each would have received had he or she not suffered such unlawful discrimination, and harm in the form of humiliation, mental anguish, and emotional distress.

Defendants are also liable for prospective relief for violations of California's Equal Protection clause. Such relief includes declaratory relief, injunctive relief, and issuance of writs of mandamus and/or prohibition.

Thus, Defendants' unlawful policies and practices as alleged adversely affect, in a similar manner, a class of persons of which Plaintiff is a member, and raise substantial questions of law and fact that are common to that class. For those reasons, Plaintiff files this charge on behalf of a class of all others similarly situated, and seeks to represent the same.

**EXHIBIT B**



**Exhibit B – Required Claim Information (Gov. Code § 910)**

Name of Claimant:	Cari McCormick
Address of Claimant, and Address Where Notices re Claim Should Be Sent:	Cari McCormick c/o Brent A. Robinson Aiman-Smith & Marcy, PC 7677 Oakport Street, Suite 1150 Oakland, CA 94621
Date, Place, and Other Circumstances of the Occurrence or Transaction which Gave Rise to the Claim Asserted:	Following a decision in favor of Ms McCormick by the First District Court of Appeal in 2019, CalPERS granted Ms McCormick ordinary disability retirement. For additional information about facts giving rise to claim asserted, see Exhibit A.
A General Description of the Loss Incurred:	See Exhibit A for detailed factual narrative.
The Name or Names of the Public Employees Causing the Injury, Damage, or Loss, if Known:	Unknown.
The Amount Claimed If Less than \$10k:	The amount claimed exceeds \$10k.

Note: This Claim is presented on behalf of a class of similarly situated persons. Claimant is the proposed representative claimant. The class description is provided in Exhibit A.

**EXHIBIT C**

**Exhibit C – List of Potential Defendants**

1. South San Joaquin County Fire Authority
2. Central Fire Protection District of Santa Cruz County
3. California Intergovernmental Risk Authority
4. State of California
5. Alameda County Office of Education
6. Alpine County Office of Education
7. Amador County Office of Education
8. Butte County Office of Education
9. Calaveras County Office of Education
10. Colusa County Office of Education
11. Contra Costa County Office of Education
12. Del Norte County Office of Education
13. El Dorado County Office of Education
14. Fresno County Office of Education
15. Glenn County Office of Education
16. Humboldt County Office of Education
17. Imperial County Office of Education
18. Inyo County Office of Education
19. Kern County Office of Education
20. Kings County Office of Education
21. Lake County Office of Education
22. Lassen County Office of Education
23. Los Angeles County Office of Education
24. Madera County Office of Education
25. Marin County Office of Education
26. Mariposa County Office of Education
27. Mendocino County Office of Education
28. Merced County Office of Education
29. Modoc County Office of Education
30. Mono County Office of Education
31. Monterey County Office of Education
32. Napa County Office of Education
33. Nevada County Office of Education
34. Los Angeles Unified School District
35. Los Angeles Community College District
36. San Diego County Office of Education
37. Alpine County
38. Amador County
39. Butte County
40. Calaveras County
41. Colusa County

Exhibit C  
Page 2

42. Del Norte County
43. El Dorado County
44. Glenn County
45. Humboldt County
46. Inyo County
47. Kings County
48. Lake County
49. Lassen County
50. Madera County
51. Mariposa County
52. Modoc County
53. Mono County
54. Monterey County
55. Napa County
56. Nevada County
57. Placer County
58. Plumas County
59. Riverside County
60. San Benito County
61. San Joaquin County
62. Santa Clara County
63. Santa Cruz County
64. Shasta County
65. Sierra County
66. Siskiyou County
67. Solano County
68. Sutter County
69. Tehama County
70. Trinity County
71. Tuolumne County
72. Yolo County
73. Yuba County
74. Adelanto
75. Agoura Hills
76. Alameda
77. Albany
78. Alhambra
79. Aliso Viejo
80. Alturas
81. American Canyon
82. Anaheim
83. Anderson
84. Angels

Exhibit C  
Page 3

85. Antioch
86. Apple Valley
87. Arcadia
88. Arcata
89. Arroyo Grande
90. Artesia
91. Arvin
92. Atascadero
93. Atherton
94. Atwater
95. Auburn
96. Avalon
97. Avenal
98. Azusa
99. Bakersfield
100. Baldwin Park
101. Banning
102. Barstow
103. Beaumont
104. Bell
105. Bell Gardens
106. Bellflower
107. Belmont
108. Belvedere
109. Benicia
110. Berkeley
111. Beverly Hills
112. Biggs
113. Bishop
114. Blue Lake
115. Blythe
116. Bradbury
117. Brawley
118. Brea
119. Brentwood
120. Brisbane
121. Buellton
122. Buena Park
123. Burbank
124. Burlingame
125. Calabasas
126. Calexico
127. California City

Exhibit C  
Page 4

128. Calimesa
129. Calipatria
130. Calistoga
131. Camarillo
132. Campbell
133. Canyon Lake
134. Capitola
135. Carlsbad
136. Carmel-By-The-Sea
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