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5 *Attorneys for Defendants*  
*Travel Guard Group, Inc.; AIG Travel, Inc.; and*  
6 *National Union Fire Insurance Company of*  
*Pittsburgh, PA*  
7

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
11

12 TAMIKA MILLER, JULIANNE  
CHUANROONG, and STEPHANIE ALLEN  
13 on behalf of themselves, the general public, and  
those similarly situated,

14 Plaintiffs,

15 v.

16 TRAVEL GUARD GROUP, INC.; AIG  
17 TRAVEL, INC.; and NATIONAL UNION  
FIRE INSURANCE COMPANY OF  
18 PITTSBURGH, PA,

19 Defendants.  
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Case No. 3:21-cv-09751-TLT

**DECLARATION OF ROBERT  
GALLAGHER IN SUPPORT OF  
MOTION FOR FINAL APPROVAL OF  
CLASS SETTLEMENT [ECF 185]**

Hearing Date: October 1, 2024  
Time: 2:00 p.m.  
Place: Courtroom 9  
Judge: Hon. Trina L. Thompson

1 I, Robert Gallagher, hereby declare as follows:

2 1. I am the Senior Vice President and Chief Operating Officer at AIG Travel, Inc.  
3 and Travel Guard Group, Inc (collectively, “Defendants”). I have personal knowledge about the  
4 organization and business operations of the Defendants. I have personal knowledge of the facts  
5 stated herein and if called to testify, could and would competently testify thereto.

6 2. In 2024, Defendants updated their disclosures to potential customers regarding the  
7 price of Travel Guard insurance products. The updated disclosures include language explaining,  
8 prior to purchase, that the price of Travel Guard insurance includes both an insurance premium  
9 and a separate fee for travel assistance services.

10 3. These updated disclosures are provided in online purchase path offers on all Travel  
11 Guard websites and on all known Travel Guard distribution partners’ websites. The updated  
12 disclosure in online purchase path offers includes wording explaining that Travel Guard’s product  
13 prices contain both the insurance premium and the Travel Assistance Fee, such as: “Quoted price  
14 for plan includes both insurance premium and fee for travel assistance services.”

15 4. The updated disclosure has also been included in Travel Guard’s policy fulfillment  
16 documents, which are available for customers to review prior to purchase, as well as received by  
17 all customers post-purchase—with the exception of one pre-purchase channel that is nearing  
18 completion; the updated pre-purchase policy forms on the Travel Guard website are being  
19 uploaded this week, with an expected completion date of September 18, 2024. The updated  
20 disclosure in policy fulfillment documents includes similar wording to note that there is a separate  
21 fee for travel assistance services: “Price paid for this plan includes both insurance premium and  
22 fee for travel assistance services.”

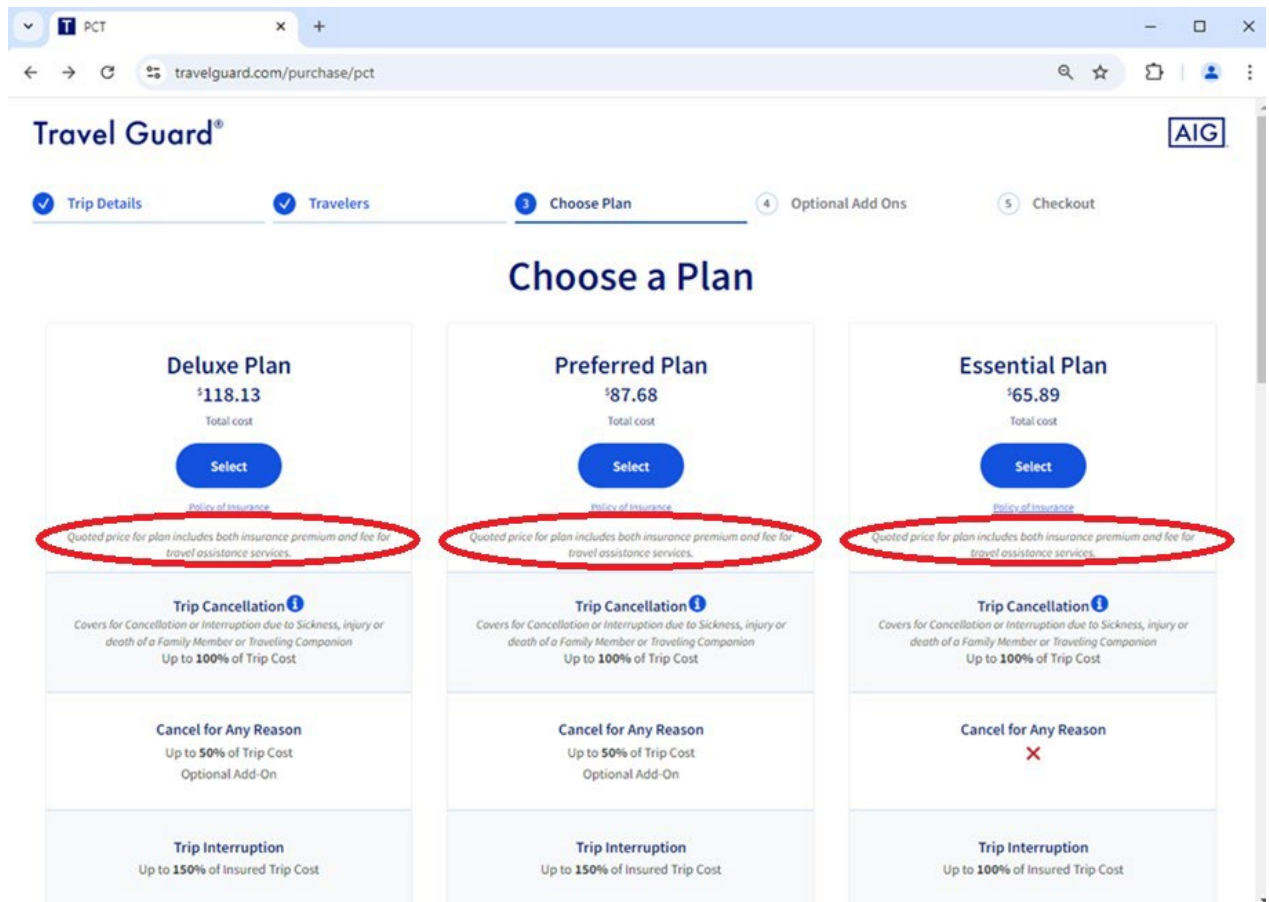
23 5. The process of updating the disclosure was completed on a per-partner basis, with  
24 some partners including the updated disclosure on their websites sooner than others. Similarly,  
25 some policy documents were updated sooner than others.

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1 6. Occasionally, Travel Guard or its partners create new online purchase paths.  
2 Travel Guard continues to incorporate the language in the updated disclosure into new online  
3 purchase path offers as they are presented to Travel Guard for review and approval.

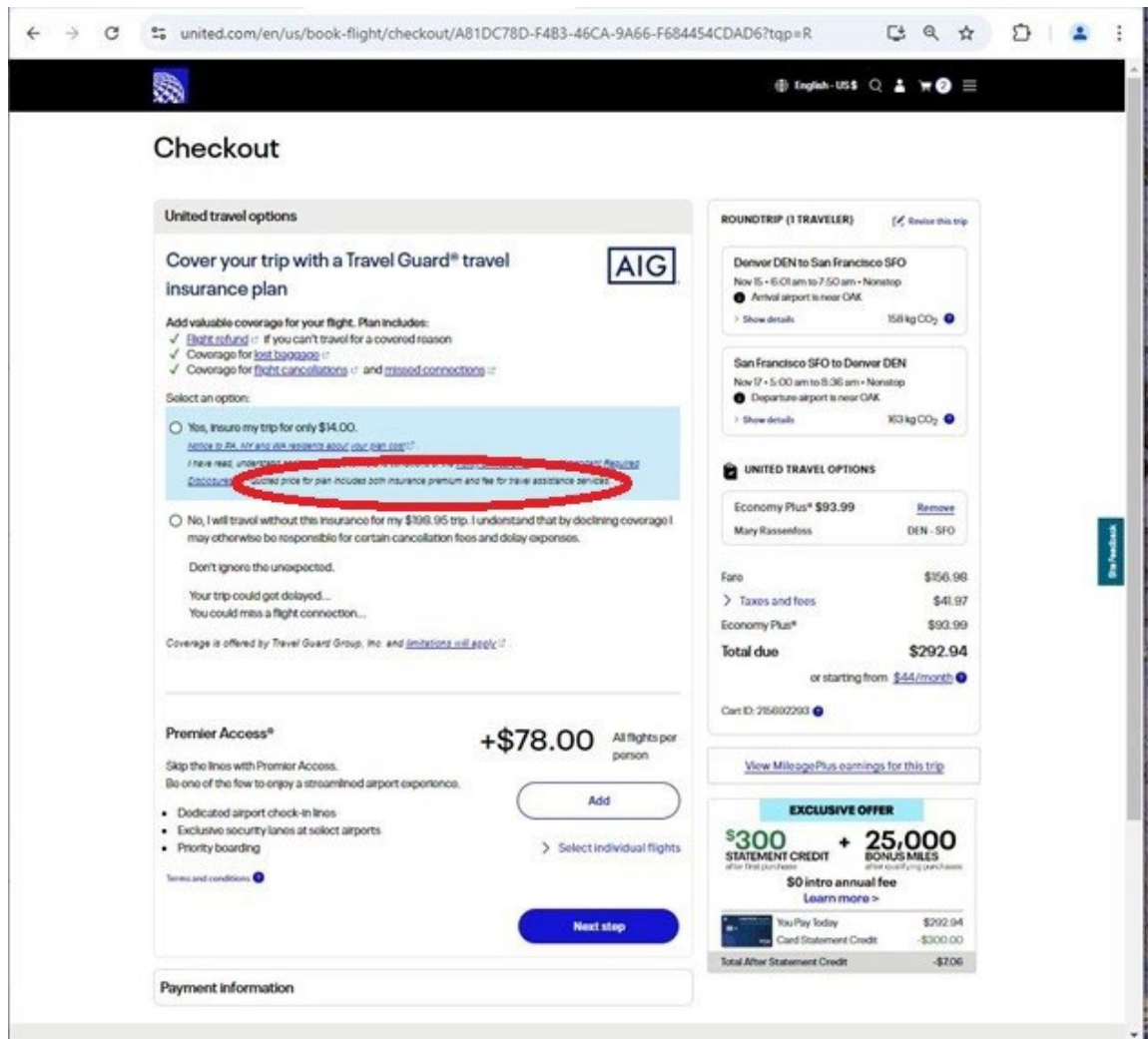
4 7. The documents excerpted and described below are representative examples of the  
5 updated disclosure language.

6 8. The below image is a true and correct copy of an excerpt taken on September 14,  
7 2024 of the “Choose a Plan” purchase path page on Travel Guard’s website.<sup>1</sup> The circled  
8 sections of the quoted price for each plan now includes the updated disclosure: “Quoted price for  
9 plan includes both insurance premium and fee for travel assistance services.”



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27 <sup>1</sup>travelguard.com/purchase/pct.

1           9.       The below image is a true and correct copy of a screenshot taken on September 13,  
2 2024 of a Travel Guard distribution partner travel insurance offer, obtained through United  
3 Airlines’ booking portal.<sup>2</sup> The circled section of the pre-purchase page for travel insurance  
4 explains that the “Quoted price for plan includes both insurance premium and fee for travel  
5 assistance services.”



<sup>2</sup><https://www.united.com/en/us/book-flight/checkout/A81DC78D-F4B3-46CA-9A66-F684454CDAD6?tp=R>.

1 10. The below image is a true and correct copy of an excerpt taken on September 14,  
2 2024 of a Travel Guard policy fulfillment document available through Travel Guard’s website.<sup>3</sup>  
3 The circled language on the cover page of the policy explains that the “Price paid for this plan  
4 includes both insurance premium and fee for travel assistance services.”



**STATE AND PRIVACY NOTICE**  
 This document is only applicable to residents of California. If you are from any other state, [click here](#) to find your state-specific Policy, or call Travel Guard at 1.800.826.1300. To view and print a copy of our privacy notice, please visit: [www.travelguard.com/default/privacynotice.aspx](http://www.travelguard.com/default/privacynotice.aspx)

**NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**  
 Executive Offices: 1271 Ave of the Americas Floor 37, New York, NY 10020-1304  
 (212) 458-5000  
 (a capital stock company, herein referred to as the Company)

**INDIVIDUAL TRAVEL PROTECTION POLICY**

**IMPORTANT**  
 This coverage is valid only if the appropriate cost has been paid.  
 Please keep this document as your record of coverage under the plan.

**PLEASE READ THIS DOCUMENT CAREFULLY!**

This Policy is issued in consideration of your application and payment of the premium due. This Policy describes all of the travel insurance benefits underwritten by National Union Fire Insurance Company of Pittsburgh, Pa., 1271 Ave of the Americas Floor 37, New York, NY 10020-1304 (herein referred to as the Company).

This Policy is a legal contract between the Insured and the Company. It is important that you read your Policy carefully. Please refer to the **Schedule** or **Declarations Page**. It provides you with specific information about the insurance you purchased.

**FIFTEEN DAY LOOK**  
 You may cancel this insurance by giving the Company or the agent written notice within the first to occur of the following: (a) 15 days from the Effective Date of your insurance; or (b) your scheduled **Departure Date**. If you do this, the Company will refund your premium paid provided no insured has filed a claim under this Policy. After this 15 day period, the premium is non-refundable.

The President and Secretary of the National Union Fire Insurance Company of Pittsburgh, Pa. witness this Policy.

*Don Bailey*  
 President

*Mc [Signature]*  
 Secretary

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21 11. Travel Guard will continue to incorporate similar notices into online purchase path  
22 offers on all Travel Guard websites and policy fulfillment documents for products including  
23 assistance services moving forward.

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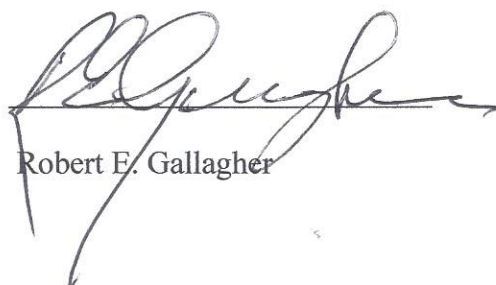
27 [https://webservices.travelguard.com/Product/FileRetrieval.aspx?CountryCode=US&StateCode=CA&ProductCode=643403&PlanCode=CA&FileType=PROD\\_PLAN\\_DOC](https://webservices.travelguard.com/Product/FileRetrieval.aspx?CountryCode=US&StateCode=CA&ProductCode=643403&PlanCode=CA&FileType=PROD_PLAN_DOC).

28 DECL. OF ROBERT GALLAGHER  
 IN SUPPORT OF CLASS  
 SETTLEMENT APPROVAL  
 NO. 3:21-CV-09751-TLT

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on September 17, 2024.



Robert E. Gallagher