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2 Pamela Pressley, SBN 180362  
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BEFORE THE INSURANCE COMMISSIONER  
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Applications of  
State Farm General Insurance  
Company,  
Applicant.

File Nos.: PA-2024-00011, PA-2024-00012,  
PA-2024-00013

**CONSUMER WATCHDOG'S WITNESS  
DESIGNATION**

1 Consumer Watchdog hereby designates the following individual as a witness in the  
2 above-captioned matter who will provide written testimony and testify at the evidentiary hearing:

- 3 1. Benjamin Armstrong, Staff Actuary, Consumer Watchdog. Mr. Armstrong will  
4 provide expert testimony (in the form of declarations and live testimony) addressing  
5 issues relevant to the calculation of rates consistent with the applicable regulations  
6 and statutes, including but not necessarily limited to the issues in dispute. In addition  
7 to providing rate calculations implementing the regulations and statutes, he may  
8 respond as appropriate to the testimony of Applicant State Farm General Insurance  
9 Company and the Department of Insurance actuaries. Pursuant to the Administrative  
10 Law Judge’s (“ALJ”) April 4, 2025 Case Management Order, a copy of Mr.  
11 Armstrong’s CV is attached as Exhibit A and included in Consumer Watchdog’s  
12 Exhibit List as IRH-CWD-230.
- 13 2. Allan Schwartz, President, AIS Risk Consultants, Inc. Consumer Watchdog may call  
14 Mr. Schwartz to testify as a potential expert witness on rebuttal related to the rate and  
15 financial issues in dispute. Pursuant to the April 4, 2025 Case Management Order, a  
16 copy of Mr. Schwartz’s CV is attached as Exhibit B and included in Consumer  
17 Watchdog’s Exhibit List as IRH-CWD-231.

18 Consumer Watchdog reserves the right to designate further witnesses as necessary to  
19 respond to Applicant’s and the Department’s pre-filed declarations, additional oral direct  
20 testimony or further evidence offered at the hearing on this matter, and/or rebuttal testimony.

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1 DATED: April 7, 2025

Respectfully submitted,

2 Harvey Rosenfield  
3 Pamela Pressley  
4 William Pletcher  
5 Benjamin Powell  
6 Ryan Mellino  
7 CONSUMER WATCHDOG

8 By: *Pamela Pressley*  
9 Pamela Pressley  
10 Attorneys for CONSUMER WATCHDOG  
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# **EXHIBIT A**

# BENJAMIN ARMSTRONG

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3445 D Street, Lincoln, NE 68510

(402) 217-0067

barmstro11@gmail.com

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## EDUCATION AND PROFESSIONAL ORGANIZATIONS

Bachelor of Arts in Actuarial Science, University of Nebraska - Lincoln. Cumulative GPA: 3.9

Fellow, Casualty Actuarial Society (FCAS)

Member, American Academy of Actuaries (MAAA)

## PROFESSIONAL EXPERIENCE

**Consumer Watchdog** – Los Angeles, CA (remote)

*Staff Actuary, 2023 - Present*

- Analyze insurer rate filings for accuracy and actuarial soundness, producing independent rate indications as applicable. Participate in rate negotiations between insurers and the California Department of Insurance.
- Prepare actuarial portions of requests for information submitted to insurers to aid in analysis.
- Perform ad hoc research tasks on topics such as catastrophe modeling in insurance ratemaking.

**Markel Corporation** – Richmond, VA and Omaha, NE (remote hybrid)

*Senior Actuary, 2022 - 2023*

- Began working 50% on workers' comp duties described below and 50% on reinsurance, including quarterly reserve reviews on a variety of QS and XOL lines of business and presentation of results to executives.
- Led a data visualization optimization team and organized the presentation of their projects to the department. Led an initiative to enhance visibility of the Actuarial department within the company, including development and dissemination of a quarterly newsletter highlighting departmental achievements.

**Markel Corporation Workers' Comp Division** - Omaha, NE (remote hybrid)

*Senior Actuarial Analyst, 2017 - 2022*

- In addition to the duties of the previous role, performed an in-depth annual analysis of workers' comp excess-of-loss pricing indications based on internal and industry data.
- Performed extensive data quality testing and troubleshooting during a years-long data migration project.
- Worked closely with external auditors to assess the effectiveness of SOX data quality controls.
- Assumed a key role in the research, selection, development, and implementation of a new software tool for use across the corporation's numerous lines of business. Provided training and support for the entire actuarial department on that new software.
- Assisted with the official response to a significant legal challenge, including preparation of remarks delivered by the Chief Actuary and direct collaboration with internal and external legal counsel.

*Actuarial Analyst, 2012 - 2017*

- Performed pricing work such as rate indications, rate filings, regulatory compliance support, correspondence with state regulators, and class/territory rate deviation analyses.
- Prepared reports for management on various key metrics, including production, pricing target variances, renewal rate monitors, loss experience, large claim activity, and claim frequency trends.
- Researched workers' comp industry experience and market trends using a variety of sources, such as rating bureau databases, S&P Global Market Intelligence, and state Departments of Insurance.
- Compiled data for the annual statement and worked directly with the statutory reporting team to ensure completeness and accuracy.
- Performed quarterly reserving analyses including data updates, review of loss development patterns, ceded loss analysis, and presented results to an executive audience both in person and virtually.

# **EXHIBIT B**

**ALLAN I. SCHWARTZ**  
President  
AIS Risk Consultants, Inc.  
4400 Route 9 South  
Freehold, New Jersey 07728  
732-780-0330

**EDUCATION**

Cooper Union, B.S., Physics, 1975

**PROFESSIONAL AFFILIATIONS**

Casualty Actuarial Society, Fellow - 1981, Associate - 1979

American Academy of Actuaries, Member - 1979

Associate in Reinsurance - June 1998  
(Received Reinsurance Association of America Award for Academic Excellence)

Associate in Claims - September 1998

Associate in Premium Auditing - May 1999

Associate in Underwriting - June 1999

Associate in Insurance Accounting and Finance - June 2002  
(Received National Association of Mutual Insurance Companies Award for Academic Excellence)

Associate in Risk Management - September 2002

Associate in Personal Insurance – January 2008

Associate, Customer Service – March 2008 (With Honors)

Certified Rate of Return Analyst – April 2011

## **PUBLICATIONS**

"Workers' Compensation and Investment Income" : Best's Review, Property / Casualty Insurance Edition, 10/82

"A Note on Calendar Year Loss Ratios" : Proceedings of the Casualty Actuarial Society, 11/82

"An Actuary's Analysis of the Security of a Self-Insured" : Business Insurance, 9/26/83

"Actuarial Issues to be Addressed in Pricing Excess of Loss Reinsurance" : Proceedings of the Los Angeles Chapter CPCU Technical Conference, 6/84 (Received Research Excellence Award from Farmers Insurance Group)

"An Actuarial Analysis of Self-Insurance" : The Self-Insurer, Volume 1, Issue 3, 1984

"Loss and Loss Expense Reserving" : The Self-Insurer, Volume 1, Issue 4, 1984

"The ABC's of Reinsurance" : The Self-Insurer, Volume 2, Issue 4, 1985

"Actuarial Implications of Claims-Made Policies" : The Journal of the Independent Reinsurance Underwriters Association, Volume I, Number 1, October 1985

"Considerations in the Regulatory Analysis of Workers' Compensation Rate Filings" : Best's Review, Property / Casualty Insurance Edition, 8/88

"Delays in Payment of Private Passenger Auto Premium Receipts / Commissions : Impact on Calculation of Investment Income", Journal on Insurance Regulation, Volume 7, No. 3, March 1989

"Various Studies Related to Workers' Compensation", State of California - Workers' Compensation Rate Study Commission, Volume V, March 1992



## **LECTURES PRESENTED**

"Reserving Losses for Self-Insureds" & "Actuarial Sufficiency of Self-Insurance Programs" : Eleventh Workers' Compensation College of the IAIABC - 4/84

"Problems, Trends, and History of Self-Insurance" : 1984 IAIABC Central States Association Conference - 6/84

"Actuarial Issues to be Addressed in Pricing Excess of Loss Reinsurance" : Los Angeles CPCU Technical Conference - 6/84

"Types of Security Available for the Self-Insured Employer" : 1984 Mid-Year Meeting of the National Council of Self-Insurers - 9/84

"Actuarial Implications of Claims-Made Policies" : Fall 1985 Meeting of the Independent Reinsurance Underwriters Association - 10/85

"North Carolina Medical Malpractice Closed Claim Study" : Duke University - Conference on Developing Information Bases for Medical Malpractice Claim Studies - 5/87

"A Regulator's Perspective on Rate Filings" : Casualty Actuarial Society Seminar on Ratemaking - 3/88

"Understanding the Insurance Industry and Regulation" : Public Citizen's Taming the Insurance Giant Conference - 2/90

"Analyzing Insurance Company Rate Filings" : National Association of Attorneys General Insurance Committee Meeting - 4/90

"Where Does All The Money Go - Insurance Profitability" : Workers Compensation in New York - 5/95

## **WORK EXPERIENCE**

### **AIS RISK CONSULTANTS, INC.**

President - 11/84 to Present

Responsibilities include performing actuarial analyses for all lines of property/casualty insurance. Loss reserve and rate level studies for insurance companies, reinsurance companies, state insurance funds, self-insurers, captive insurers, brokerage firms and attorneys. Work also involves projection of payment patterns, excess insurance studies, production of management information systems and development of individual risk rating plans.

I have provided expert testimony in insurance rate proceedings in Arkansas, California, Connecticut, Delaware, District of Columbia, Florida, Georgia, Maine, Massachusetts, Nevada, New Jersey, New Mexico, North Carolina, Oklahoma, Rhode Island, South Carolina, Texas, Vermont and Virginia.

I have worked on health insurance rate filings in California, Colorado, Massachusetts, New Jersey, New Mexico, Oregon and Vermont during the last several years. This involved the review of rate filings and the preparation of analyses which could be submitted to the state insurance regulatory agency. My work in health insurance includes providing actuarial assistance to the NAIC Consumer Representatives during the last several years dealing with various issues such as the Medical Loss Ratio calculation.

### **NEW JERSEY DEPARTMENT OF INSURANCE**

Assistant Commissioner - 5/88 to 1/90

Supervised a staff of 20+ which regulated rates, rules and policy forms in New Jersey for property/casualty insurance to determine compliance with the applicable statutes and regulations. Also responsible for the statistical section for property/casualty insurance. This section gathers and analyzes data related to property/casualty insurance. Provided advice to the Insurance Commissioner and other senior staff members of the Insurance Department regarding the impact of proposed legislation, regulations and overall policy directives.

Provided recommendations in regard to the financial analysis and condition of insurers, including excess profits reports.

NORTH CAROLINA DEPARTMENT OF INSURANCE

Chief Actuary - 6/86 to 4/88

Responsible for all actuarial studies performed in the Department of Insurance covering property / casualty / life / health / accident insurance.

Work included the analysis of filings made by insurance companies to see that they are in compliance with the insurance laws and regulations of the State of North Carolina. Also interacted with the legal staff of the Insurance Department in drafting proposed insurance laws and regulations.

Responsible for the analysis of the loss and loss adjustment expense reserves established by insurance companies to meet the liabilities they have incurred in the past, but which will not be payable until some time in the future.

Involved in various special projects relating to the financial analysis of insurance operations. These included the review of reinsurance contracts, the financial analysis of the North Carolina State Property Fire Insurance Fund and a study of medical malpractice closed claims.

Was in charge of a staff of six, including four professional and two clerical people. Other duties involved the writing of computer programs, providing expert testimony at rate hearings and assisting the Insurance Commissioner prepare for legislative committees.

WOODWARD & FONDILLER

Senior Actuary - 8/77 to 11/84

Consulting property/casualty actuarial studies (see description under AIS Risk Consultants, Inc.)

NATIONAL COUNCIL ON COMPENSATION INSURANCE

Actuarial Trainee - 3/76 to 8/77

Performed ratemaking analyses and prepared rate filings for workers' compensation insurance. Regularly evaluated the impact of changes in workers' compensation benefits. Also assisted the Director of Research with special studies related to data collection, ratemaking procedures and benefit evaluations.



## Service List

Hon. Karl Fredric J. Seligman  
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