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Intervenor

BEFORE THE INSURANCE COMMISSIONER OF  
THE STATE OF CALIFORNIA

In the Matter of the Rate Application of State	)	File No.: PA-2024-00011, PA-2024-
	)	00012, PA-2024-00013
Farm General Insurance Company, Applicant.	)	
	)	MERRITT DAVID FARREN'S RESPONSE
	)	TO CDI'S MOTION TO COMPEL
	)	DISCOVERY FROM STATE FARM
	)	
	)	
	)	Hearing Date: Monday September 15, 2025
	)	
	)	

Intervenor Merritt David Farren ("Farren") submits this response to the motion of the California Department of Insurance ("CDI"), dated August 20, 2025, related to the proceedings referenced above ("Proceedings") to compel Applicant State Farm General Insurance Company ("Applicant") to provide discovery to CDI ("Motion").

Farren supports the Motion for the reasons articulated by CDI in the Motion.

1 Farren further notes that the information regarding State Farm’s nonrenewal program  
2 requested in the Motion is not only relevant to the matters specifically articulated by CDI in the  
3 motion, but is also potentially relevant to two larger issues related to the Proceedings: one, previously  
4 touched on in prior filings by intervenor Consumer Watchdog (“CW”) in the Proceedings, as to  
5 whether Applicant comes to the Proceedings in good faith and with clean hands; and another  
6 previously raised by CW in the Proceedings, as to whether Applicant and Applicant’s parent State  
7 Farm Mutual Automobile Insurance Company act as one and should be considered as one  
8 for purposes of considering the financial matters at issue in the Proceedings.  
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10 As noted in an article in the publication Insurance Business America dated March 10, 2025,  
11 headlined *Senior State Farm exec sacked after honey trap sting over California wildfires*, statements  
12 in recorded footage made by the former vice president of innovation of Applicant’s parent State Farm  
13 Mutual Automobile Insurance Company raise questions as to Applicant’s motivation in cancelling  
14 insurance policies so vital to California citizens. As stated in the article:  
15

16 “The footage, reportedly filmed without the executive’s knowledge, shows Haden  
17 Kirkpatrick, former vice president of innovation and venture capital at State Farm, discussing  
18 how the company allegedly uses policy cancellations as leverage to gain approval for rate  
19 increases. “We go to the Department of Insurance and say, ‘We’re overexposed here. You  
20 have to let us catch up our rating,’” Kirkpatrick said in the video. “And they’ll say, ‘Eh.’  
21 Because the Department of Insurance and the insurance commissioner is an elected position in  
22 California. He’ll say, ‘Nah.’ And we’ll say, ‘OK, then we are gonna cancel these policies.”  
23  
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25  
26 These statements generally suggest that Applicant may have sought to influence the outcome  
27 of the Proceedings through inappropriate means. The “we” in the statements, specifically, suggests  
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1 that Applicant and Applicant's parent State Farm Mutual Automobile Insurance Company may  
2 act as one, in fact and at law, with major policy decisions and specific actions taken by  
3 Applicant decided by or in concert with Applicant's parent State Farm Mutual Automobile  
4 Insurance Company and that Applicant and Applicant's parent State Farm Mutual  
5 Automobile Insurance Company should potentially be considered as one for purposes of the  
6 Proceedings.  
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8 Applicant's provision of the discovery requested in the Motion should help with an  
9 understanding of these two matters in the Proceedings of considerable importance.  
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11  
12 Dated September 5, 2025  
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14 Respectfully submitted,  
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18 \_\_\_\_\_  
19 Merritt David Farren

20 Intervenor  
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1  
2 **PROOF OF SERVICE**

3 **[BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,**  
4 **EMAIL TRANSMISSION AND/OR PERSONAL SERVICE]**  
5

6 State of California, City and County of Los Angeles

7 I am employed in the City and County of Los Angeles, State of California. I am  
8 over the age of 18 years. My business address 26565 West Agoura Rd, Suite 200, Calabasas, CA  
9 91302, and I am employed in the city and county where this  
10 service is occurring. On September 5, 2025, I caused service of true and correct  
11 copies of the document entitled: **MERRITT DAVID FARREN'S RESPONSE TO CDI'S**  
12 **MOTION TO COMPEL DISCOVERY FROM STATE FARM** in the Matter of the Rate  
13 Application of State Farm General Insurance Company, Applicant, upon the persons named in the  
14 attached service list, in the following manner:  
15

- 16 1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number  
17 stated to the person(s) named.  
18  
19 2. If marked EMAIL, by electronic mail transmission this date to the email address  
20 stated.  
21  
22 3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this  
23 date for collection for regular or overnight mailing true copies of the within  
24 document in sealed envelopes, addressed to each of the persons so listed. I am  
25 readily familiar with the regular practice of collection and processing of  
26 correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed  
27 by U.S. Mail, these envelopes would be deposited this day in the ordinary course of  
28

1 business with the U.S. Postal Service. If mailed Overnight, these envelopes would be  
2 deposited this day in a box or other facility regularly maintained by the express  
3 service carrier or delivered this day to an authorized courier or driver authorized by  
4 the express service carrier to receive documents, in the ordinary course of business,  
5 fully prepaid.  
6

7  
8 I declare under penalty of perjury that the foregoing is true and correct.  
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10 Executed on September 5, 2025, at Los Angeles, California.  
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14 Merritt David Farren  
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1 **SERVICE LIST**

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3  
4 Hon. Karl Frederic J. Seligman  
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6 Administrative Hearing Bureau  
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