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17
18 BEFORE THE INSURANCE COMMISSIONER
19
20 OF THE STATE OF CALIFORNIA

21 In the Matter of the Rate Applications of

22 State Farm General Insurance
23 Company,

24 Applicant.

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

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28 **CONSUMER WATCHDOG AND
CALIFORNIA DEPARTMENT OF
INSURANCE'S JOINT STATEMENT ON
DISPUTED ISSUES REGARDING
CONSUMER WATCHDOG's
DISCOVERY REQUESTS TO THE CDI
AND WITHHELD DOCUMENTS**

1 Per the Court's October 9, 2025 Amended Scheduling Order, Consumer Watchdog and
2 the California Department of Insurance ("CDI") hereby submit this Joint Statement on Disputed
3 Issues Regarding Consumer Watchdog's Discovery Requests to the CDI and Withheld
4 Documents. The Court directed the parties to further meet and confer and identify any
5 outstanding issues that require resolution by the ALJ. Consumer Watchdog and CDI have met
6 and conferred and submit the below statement to inform the ALJ on issues that require resolution
7 as they pertain to specific Discovery Requests that were the subject of Consumer Watchdog's
8 Motion to Compel Discovery Responses Against CDI filed and served on August 20.
9 Through meet and confer efforts, CDI has confirmed that it has no responsive documents to
10 Consumer Watchdog Request No. 23, other than documents publicly available in SERFF;
11 accordingly, Consumer Watchdog withdraws this Request No. 23 from its pending Motion to
12 Compel.

13 **Consumer Watchdog Request Nos. 5, 10, 11, 21 – Withheld Documents**

14 **Consumer Watchdog's Position:** It is Consumer Watchdog's understanding through meet and
15 confer discussions with CDI that all documents responsive to these requests 5, 10, 11 and 21 are
16 contained in CDI's privilege log (see Exh. 9 to Powell Decl. ISO MTC Discovery Responses
17 Against CDI).¹

18 As the Court's 9/15/25 tentative ruling held:

19 "Discovery privileges are strictly statutory" existing "where a statute not only
20 restricts disclosure, *but includes some additional indicia that the Legislature*
intended to restrict disclosure even in the context of litigation." (*Los Angeles*
21 *Unified School Dist. v. Trustees of Southern California IBEW-NECA Pension*
Plan (2010) 187 Cal.App.4th 621, 628, 630.) In other words, California
22 recognizes only privileges plainly and clearly established by statute. (Evid. Code,
23 § 911; *Welfare Rights Organization v. Crisan* (1983) 33 Cal.3d 766, 768; *HLC*
24 *Properties, Ltd. v. Superior Court* (2005) 35 Cal.4th 54, 59; *Roberts v. City of*
Palmdale (1993) 5 Cal.4th 363, 373; Cal. Law Revision Com. com., West's Ann.
25 Evid. Code, foll. § 911.) Authority cited in response appears either facially

26 ¹ For Request No. 5 specifically, following additional meet and confer discussions, CDI has
27 confirmed that the only communications in its possession that are not listed on its privilege log
28 that discussed financial assistance from State Farm Mutual are those that occurred prior to the
Interim Rate Hearing that were made available to all parties.

1 inapplicable to an administrative trial or otherwise fails because the discovery
2 sought pertains to issues material to the Applications and is appropriate for
3 disclosure. (Ins. §§ 735,1215.8; *John B. v. Superior Court* (2006) 38 Cal.4th
4 1177, 1198; *Steiny & Co., Inc. v. California Electric Supply Co.* (2000)
5 79 Cal.App.4th 285, 292; *Marylander v. Superior Court* (2000) 81 Cal.App.4th
6 1119, 1130.)

7 Accordingly, per the Court’s 9/15/25 tentative ruling, “CDI shall produce all documents
8 responsive to CW’s Requests, as tailored and narrowed through the parties’ meet-and-confer
9 process.” It further held that “CDI may otherwise withhold documents only if they are expressly
10 identified as subject to attorney-client privilege (Evid. Code, §§ 1060–1063) or attorney work
11 product protection (Code Civ. Proc., § 2018.030), and listed on a privilege log.” The ALJ further
12 noted in his tentative that “*All other objections are overruled.*” (Emphasis added.) As none of the
13 documents contained in CDI’s privilege log invoke the attorney-client privilege or attorney work
14 product protections, Consumer Watchdog’s position, consistent with the arguments it made in its
15 Motion to Compel (pp. 6-9) responding to CDI’s other asserted statutory protections, is that CDI
16 must produce them in their entirety and asks the ALJ to confirm its tentative to overrule all other
17 objections on these requests.

18 To the extent CDI’s position is that any of the documents contained in the privilege log
19 are “absolutely privileged” from disclosure under Insurance Code section 735.5 because they
20 were obtained during the course of a financial exam, Consumer Watchdog disagrees that CDI
21 has met its burden to make such a showing. In any case, as CDI has acknowledged (Opp. p. 20),
22 the Commissioner has discretion to release such documents under section 735.5(a) in the
23 furtherance of any legal or regulatory action. If the ALJ finds that any documents would
24 otherwise be protected from disclosure under section 735.5, Consumer Watchdog’s position
25 remains that if the Commissioner intends to consider any variance requests from State Farm
26 relying on proof of its financial condition, CDI should also be required to produce in discovery
27 all documents discussing State Farm’s financial condition that are directly relevant to those
28 variances.

Finally, any interest CDI claims about maintaining the confidentiality of communications
with other regulators, here specifically the Illinois DOI, SFG’s “home state regulator,” under any

1 asserted official information or deliberative process privilege under Evidence Code section 1040
2 is clearly outweighed by the public's interest under the prior approval and public transparency
3 provisions of Prop 103 (Ins. Code §§ 1851.05, 1861.07, 1861.10) in ensuring that SFG's
4 requested rate increases relying on variances that put its financial condition directly at issue are
5 thoroughly vetted in a public process, including the production of evidence compiled by state
6 regulators who have examined State Farm's solvency, not just the information State Farm
7 chooses to present.

8 **CDI's position:**

9 **In its privilege log, CDI identified the documents withheld and the basis upon which**
10 **they were withheld. The documents listed as responsive to these requests have all been**
11 **withheld based on the absolute statutory protection of Insurance Code section 735.5 and**
12 **there is no basis for this court to overrule that objection.**

13 Insurance Code section 735.5 provides that “[a]ll working papers, recorded information,
14 documents, and copies thereof produced by, obtained by, or disclosed to the commissioner or
15 any other person in the course of an examination made pursuant to this article shall be given
16 confidential treatment and are not subject to subpoena and shall not be made public by the
17 commissioner or any other person.” Limited exceptions apply to allow the Commissioner, *in his*
18 *discretion*, to use and make public information “in the furtherance of any legal or regulatory
19 action which the commissioner may, in his or her discretion, deem appropriate,” and to disclose
20 information to other regulators when the receiving party agrees to keep the information
21 confidential.

22 Here, the Commissioner has *not* exercised his discretion to waive the statutory privilege
23 provided by Insurance Code section 735.5. CW's position that the Commissioner must waive
24 Insurance Code section 735.5 to consider a variance is not based on any statute, regulation or
25 case law and is just plain wrong.

26 It is State Farm General's (SFG's) burden to prove it is entitled to a variance. The
27 Commissioner has no burden of proof in this hearing and no obligation to waive the statutory
28 protections afforded to the confidential documents at issue regarding SFG's financial condition.

1 In fact, the Commissioner has every reason to uphold such important statutory protections
2 because they are the basis upon which other state regulators will agree to share confidential
3 documents with the Commissioner and the basis upon which CDI maintains its NAIC
4 accreditation. In addition to the express statutory protections, CDI is also contractually obligated
5 to keep these documents confidential; before releasing information to the Commissioner, the
6 Illinois Department of Insurance (IDOI) required CDI to contractually agree to maintain the
7 confidentiality of the documents under Insurance Code sections 735.5 and 12919 and all other
8 applicable California privileges and protections. As CDI argued vociferously at the oral
9 argument on September 16, 2025, absent waiver by the Commissioner, the protections provided
10 by Insurance Code section 735.5 are absolute and they are critical to the free exchange of
11 information between state regulators.

12 CW's suggestion that this court need weigh the public interest in disclosure vs. non-
13 disclosure is a red herring. Insurance Code section 735.5 is an absolute privilege, and no
14 balancing test is required. But even if the Court were to apply a balancing test, which is not
15 proper for documents absolutely protected under Insurance Code section 735.5, the public
16 interest in allowing state regulators to freely exchange confidential information between
17 themselves would outweigh any interest CW has in discovering what conclusions the IDOI may
18 have reached with regard to SFG's financial condition. (See argument CDI's counsel made at
19 the September 16, 2025 hearing with regard to importance of the free exchange of information
20 between state regulators.)

21 Additionally, SFG – not the Department - has the burden to produce evidence with regard
22 to its financial condition in this hearing if it wants to seek a variance. The conclusions of the
23 IDOI regarding SFG's financial condition are not relevant to the Commissioner's ultimate
24 decision regarding whether SFG qualifies for a ratemaking variance under California law.²

25 CDI also notes that if the court were to order disclosure of this information contrary to
26 the absolute protections of Insurance Code section 735.5 and CDI's contractual obligations, the
27

28 ² In fact, the ALJ has already ruled that SFG may not rely on Risk Based Capital documents and
those appear to be contained in the confidential Illinois documents.

1 IDOI and other states' regulators would have every reason to withhold sensitive, confidential
2 financial information and documents regarding other insurers from CDI in the future and it could
3 cause CDI to lose its accreditation with the NAIC. One of the Commissioner's primary
4 responsibilities is to ensure that insurers remain financially viable so they can afford to pay
5 claims to Californians in the event of loss. If other state regulators were to withhold sensitive
6 financial information regarding insurers from the Commissioner it could seriously imperil
7 California consumers. Illinois and other state regulators should be free to alert CDI to an
8 insurance company's sensitive financial issues without fear of public disclosure.

9 Finally, CDI has shown that the Illinois documents on the privilege log were obtained as
10 part of a financial exam because they were obtained by CDI's Financial Surveillance Branch
11 ("FSB"). CDI explained that all of the documents obtained by FSB were obtained as part of a
12 financial exam because FSB's sole job is to examine the financial conditions of insurance
13 companies. In its opposition and at oral argument, CDI provided the name of each CDI
14 employee that received the Illinois financial documents on the privilege log and their job title
15 within FSB. CDI showed that the majority of FSB job titles even contain the words "examination
16 or examiner." (See, CDI opposition at footnote 31.) CW has made no counter-argument, other
17 than to baldly claim, without any basis, that FSB did not obtain the documents as part of a
18 financial exam. Of course, CW did not raise this alleged issue in meet and confer, nor ask CDI
19 for any further information on this issue – CW's position is made in bad faith.

20 For all the reasons CDI sets forth above, the protections of Insurance Code section 735.5
21 apply as an absolute bar to production of the documents at issue on CDI's privilege log.

22 **Consumer Watchdog Request Nos. 4, 15**

23 **Consumer Watchdog's Position:** While CDI's privilege log does not indicate that any
24 documents or communications responsive to Request Nos. 4 or 15 are being withheld based on
25 privilege, as a result of the Parties' meet and confer efforts, it is Consumer Watchdog's
26 understanding that any documents responsive to Request Nos. 4 or 15 are in fact being withheld
27 and have already been logged in CDI's privilege log in response to other requests. If that is the
28 case, CDI should update its privilege log to clearly identify which of the listed documents are

1 responsive to these Requests. As with the documents responsive to the requests above, Consumer
2 Watchdog's position is that any documents and communications responsive to these Requests
3 Nos. 4 and 15 that are not attorney client privileged or protected attorney work product must be
4 produced.

5 To the extent CDI's position is that any of the documents contained in its privilege log
6 responsive to these Requests Nos. 4 and 15 are protected from disclosure under Insurance Code
7 section 735.5 because they were obtained as part of a financial exam, Consumer Watchdog
8 disagrees that CDI has met its burden to make such a showing and maintains its position as
9 discussed above and in its Motion to Compel that neither section 735.5 nor any other statutes
10 relied on by CDI provide an absolute discovery privilege, particularly as to documents that are
11 directly relevant to the solvency issues placed squarely at issue by a variance request that the
12 agency is considering in a contested public rate hearing.

13 **CDI's position:**

14 CDI objects to CW's inclusion of these requests in the Joint Statement of Issues because
15 CW never raised these in the month plus of time it had to meet and confer between September 17
16 and October 20. CDI nonetheless addresses these requests below.

17 As CDI understands it, CW is asking CDI if some of the documents on the privilege log,
18 which are already listed as responsive to 5, 10, 11 and 21 are also responsive to Nos. 4 and 15,
19 and then CW wants the court to rule that Insurance Code section 735.5 does not apply to those
20 documents. To be clear, the documents listed on the privilege log are not responsive to Nos. 4
21 and 15. Regardless the documents on the privilege log are privileged for the reasons listed in the
22 preceding section.

23 **Request No. 20**

24 **Consumer Watchdog's Position:** Request No. 20 seeks "all communications between CDI staff
25 and the Insurance Commissioner or executive office personnel related to this proceeding." As a
26 result of meet and confer efforts, Consumer Watchdog agreed to limit the definition of
27 "executive office personnel" to the list of nine executives provided in its August 20, 2025 meet
28 and confer letter (Exh. 12 to Powell Decl. ISO MTC Discovery Responses Against CDI). The

1 ALJ's 9/15 tentative ruling further limited the definition of "staff" in Request No. 20 to
2 "individuals who are or were involved in CDI's representation in connection with litigating the
3 Applications for hearing in this case." Therefore, Consumer Watchdog's position is that CDI
4 must produce all communications regarding issues in this proceeding between any CDI "staff,"
5 as defined in the ALJ's 9/15 tentative set forth above on the one hand, including any executive
6 staff who CDI has stated are or were working on the prosecution side of the case,³ and the
7 Insurance Commissioner or any other executive staff not working directly on the prosecutorial
8 side of the case on the other hand.

9 CDI has taken the position during the meet and confer process that it does not have to
10 produce any communications in response to Request No 20 (as narrowed by the ALJ's tentative
11 and Consumer Watchdog's Aug. 20 letter) between executive staff working on the prosecutorial
12 side of the case and Commissioner Lara/other executive staff who are not on the prosecutorial
13 side and that some of these communications would be irrelevant as to certain "executives" on the
14 narrowed August 20 list. Consumer Watchdog's position is that if individuals on the narrowed
15 August 20 list of executives are in fact communicating about issues in the case with any staff
16 members, including executive staff members, involved in litigating the case, those
17 communications would in fact be relevant and responsive to Request No, 20 and must be
18 produced.

19 Further, CDI made the argument in its opposition to Consumer Watchdog's Motion to
20 Compel that

21 CW's Request No. 20 as clarified by CW does not seek relevant evidence. There is
22 no adjudicative decision presently before the Commissioner. Currently, this
23 adjudicative proceeding is before the ALJ. If and when the ALJ sends a proposed
24 decision to the Commissioner for adoption, rejection, or mitigation, CDI assumes
the Commissioner will then disclose any improper substantive ex parte
communications he—or any decisional advisors who may ultimately assist him in

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26 ³ During the meet and confer process, CDI stated that in addition to REB attorneys assigned to
27 this matter, there are at least four executive staff working on the prosecution side, including
28 Michael Martinez, Chief Deputy Commissioner, Ken Allen, Deputy Commissioner, Rate
Regulation, Tony Cignarale, Deputy Commissioner, Consumer Services and Market
Conduct, and Teresa Campbell, General Counsel and Deputy Commissioner, Legal.

1 making an adjudicative decision—may have received while the proceeding is
2 pending.

3 CDI reiterated this same argument during meet and confer efforts. Consumer Watchdog opposes
4 this construction of the statutes that any ex parte communications between the Commissioner
5 and any of his executive staff on the prosecution team should only be disclosed to the parties “if
6 and when the ALJ sends a proposed decision to the Commissioner.” Government Code section
7 11430.10 made applicable to the Commissioner by Government Code section 11430.70 plainly
8 applies “while the proceeding is pending” such that any ex parte communications between CDI
9 staff, including executive staff, working on the prosecution team and Commissioner Lara are not
10 privileged and must be disclosed when made during the pendency of the proceeding to allow for
11 notice and opportunity for all parties to participate in the communication, not just at the time the
12 proposed decision goes to him. If CDI’s argument were correct, then any party (including CDI
13 staff representing CDI in this case, as well as State Farm or Consumer Watchdog
14 representatives), would be free to engage in ex parte communications with the Commissioner
15 about issues in this proceeding right up until the time a proposed decision is issued, and only
16 then would those communications need to be disclosed. This is a misreading of the statutes.⁴

16 In any event, the ex parte rules prohibit communications from CDI “staff” representing
17 CDI as a party to the Commissioner or any “executive staff” member who relays those
18 communications to him during the pendency of the proceeding. To the extent CDI’s position is
19 that these communications are either irrelevant or privileged from being turned over in
20 discovery, such arguments must be rejected, and such communications must be produced.

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26 ⁴ The court need not rule on CW’s issue of whether non-existent ex parte communications
27 between the Commissioner and executives must be disclosed prior to the time a Proposed Order
28 is sent to the Commissioner. That issue is not properly before this court because CDI did not
request any executive to executive communications. With regard to staff-to-Commissioner
improper ex parte communications, CDI already advised that there are no such communications.

1 **CDI's Position:**

2 CW's Request No. 20 seeks communications between CDI staff on the one hand and the
3 Commissioner or CDI Executives on the other hand. CW's request, as written, does not seek
4 communications between CDI Executives. Notwithstanding that its Request does not seek
5 executive to executive communications, CW here asks the court to allow it to morph and expand
6 its request into one seeking executive to executive communications and to order CDI to produce
7 such communications. AHB must deny this request because on its face Request No. 20 does not
8 seek executive to executive communications.⁵

9 With regard to the documents actually requested in Request No. 20, CDI has advised CW
10 that CDI staff working on this matter do not communicate with the Commissioner regarding this
11 matter.

12 As to any communications between CDI staff working on this matter and the eight
13 remaining executives on CW's list, CDI has explained that five of those executives are part of
14 the prosecution team for this matter. CDI should not be forced to log internal communications
15 between staff and the executive team working on the prosecution of this case. Such an exercise
16 would be unduly burdensome and serve no purpose whatsoever as those documents would *not* be
17 admissible in this action as they are all protected by the attorney-client privilege, the work-
18 product doctrine, the deliberative process and/or official information privilege.

19 The three remaining executives on CW's list are: 1) Lucy Wang – Special Counsel and
20 Deputy Commissioner, 2) Eric Charlick, Deputy Commissioner, Enforcement and 3) Laurie
21 Menchaca, Deputy Commissioner, Administration and Licensing Services. CDI has advised that
22 there are no non-privileged responsive documents with regard to Lucy Wang. (See, CDI
23 opposition to motion to compel, 17:14-16.) During meet and confer, CDI asked CW to explain
24 how Eric Charlick's communications would be relevant as his group – Enforcement –
25 investigates criminal fraud and has nothing to do with this matter. CW has no reasonable
26 response but instead indicated that it wanted to check and see if staff told Mr. Charlick

27 ⁵ CW has worked with CDI for over 35 years. It indisputably knows that one or more CDI
28 executives are always on the prosecution side of an administrative proceeding. It knew that CDI
 executives were on the prosecution side in this proceeding.

1 something about this case who in turn might have secretly communicated it to the
2 Commissioner. As argued previously, CDI again and again shows that CW's requests are
3 nothing more than an impermissible fishing expedition.

4 Finally, CDI understands that Laurie Menchaca supervises the ALJ currently presiding
5 over this matter. CDI has explained that it believes it would be inappropriate for the CDI staff
6 working on this matter to have access to her emails to search them. CDI assumes that there *are*
7 responsive emails between the ALJ and Ms. Menchaca regarding this matter, but that any such
8 responsive emails are privileged and should not be reviewed by the CDI staff working on this
9 matter nor should they be produced publicly.

10 In sum, CDI has met its obligations with respect to Request No. 20 and asks this court to
11 enter a ruling with all due haste.

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13 DATED: October 22, 2025

Respectfully submitted,

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DATED: October 22, 2025

CALIFORNIA DEPARTMENT OF INSURANCE

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PROOF OF SERVICE
BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,
EMAIL TRANSMISSION AND/OR PERSONAL SERVICE

State of California, City of Los Angeles, County of Los Angeles

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 6330 South San Vicente Boulevard, Suite 250, Los Angeles, California 90048, and I am employed in the city and county where this service is occurring.

On October 22, 2025, I caused service of true and correct copies of the document entitled

**CONSUMER WATCHDOG AND CALIFORNIA DEPARTMENT OF INSURANCE'S JOINT
STATEMENT ON DISPUTED ISSUES REGARDING CONSUMER WATCHDOG'S
DISCOVERY REQUESTS TO THE CDI AND WITHHELD DOCUMENTS**

upon the persons named in the attached service list, in the following manner:

1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number stated to the person(s) named.
2. If marked EMAIL, by electronic mail transmission this date to the email address stated.
3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this date for collection for regular or overnight mailing true copies of the within document in sealed envelopes, addressed to each of the persons so listed. I am readily familiar with the regular practice of collection and processing of correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed by U.S. Mail, these envelopes would be deposited this day in the ordinary course of business with the U.S. Postal Service. If mailed Overnight, these envelopes would be deposited this day in a box or other facility regularly maintained by the express service carrier, or delivered this day to an authorized courier or driver authorized by the express service carrier to receive documents, in the ordinary course of business, fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 22, 2025 at Los Angeles, California.

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