



August 18, 2024

VIA EMAIL

California Department of Insurance
Custodian of Records
300 Capitol Mall
Suite 1700
Sacramento, CA 95814
Phone: (916) 492-3657
Email: CustodianOfRecords@insurance.ca.gov

Re: Request for Records Concerning Consumer Complaints about Life Insurance, including Annuities, pursuant to the California Public Records Act and the California Constitution

To the Custodian of Records:

Pursuant to the California Public Records Act (“CPRA”) and article 1, section 3, subdivision (b) of the California Constitution, the Life Insurance Consumer Advocacy Center (LICAC) hereby requests that the California Department of Insurance (“Department”) provide a full and complete copy of the following records:¹

1. All statistics tracked or maintained by the Department concerning the following kinds of consumer complaints involving life insurance or annuities, including statistics concerning the resolution of such complaints:
 - a. Premium or billing
 - b. Surrenders
 - c. Cancellations
 - d. Rating or underwriting
 - e. Suitability
 - f. Agent Misrepresentation
 - g. Any other type of consumer complaint about life insurance or annuities

2. Any description of, or key to, any codes used by the Department, including the Consumer Services Branch and the Investigations Branch, to classify or track information about consumer complaints involving life insurance or annuities.

¹ The term “records” includes, but is not limited to, documents and communications, whether created or maintained in printed, typed, hand-written, facsimile, or email or other digital form.



LICAC requests these records in an electronic format such as Portable Document Format (“PDF”).

Please produce records for as far back in time as such records are maintained by the Department. If there are no records responsive to the requested materials, please confirm in writing that such records do not exist, and if responsive records used to exist but have been lost, stolen, or destroyed, please (1) identify the date of loss, theft, or destruction and (2) provide a copy of all available evidence of the loss, theft, or destruction.

Any records withheld from production for inspection under the CPRA should be separately identified and accompanied by the claimed justification for withholding those records as required by Government Code section 7922.000. The justification should state the nature of the record withheld and the specific exemption under which the record is being withheld and provide an explanation of why the public interest is served by withholding the record. LICAC reserves the right to challenge your decision to withhold any materials or portions of documents.

LICAC is prepared to pay reasonable duplication fees in connection with this CPRA request. However, agencies have discretion to waive fees in order to provide greater access to public records pursuant to Government Code section 7922.505. (See *North Co. Parents Org. v. California Dep’t of Educ.* (1994) 23 Cal.App.4th 144, 148.) As the information that is the subject of this request is of primary benefit to the public and LICAC is a non-profit, 501(c)(4) social welfare organization, we suggest that the Department waive any search and duplication fees. Consistent with Government Code section 7922.535(a), we expect to hear from the Department within ten days. Please contact us if you have any questions concerning this request. We may be reached at 415-305-7117 and via email. Thank you.

Respectfully submitted,

Brian P. Brosnahan

Brian P. Brosnahan
Executive Director
Life Insurance Consumer Advocacy Center