

To: Tony Cignarale

Deputy Commissioner, California Dept. of Insurance

It has come to my attention that my name and professional opinions were cited in a presentation by the ACTS Law Firm during the above-referenced proceedings. The presentation characterizes my work and credentials in a manner that is inaccurate, misleading, and prejudicial, and I respectfully submit this letter to correct the record.

First, the presentation asserts that opinions I expressed in a 2019 research summary are invalid because the work was not published. This is a fundamentally incorrect inference. Scientific validity is determined by the rigor of methodology and analysis, not solely by publication status. Unpublished technical analyses, agency reports, and commissioned research are routinely relied upon by public health agencies, regulators, and courts.

Second, the presentation further suggests that my work concerning wildfire smoke and post-fire damage is invalid on the grounds that my research findings were not published. This assertion is factually incorrect. I have conducted substantial research related to wildfire impacts and have published multiple articles on wildfire-related topics. Relevant publications are attached for your review.

Third, the presentation implies that my work in the wildfire and wildland–urban interface arena lacks validity because I do not hold credentials in public health. This claim is demonstrably false. My career has been devoted to the protection of public health and the advancement of science in service of that mission. I hold a PhD and an MPH, and my professional roles have included:

- Director of Environmental Health, City of Seattle
- Director of Environmental Health, State of Minnesota
- Deputy Chief, California OSHA

In these roles, I was directly involved in the development, implementation, and enforcement of public health and occupational health standards. My work has spanned public health agencies, the U.S. Department of Defense, private industry, and litigation matters involving environmental and health damage.

During the COVID-19 pandemic, I co-founded a company that developed ultraviolet technologies designed to inactivate SARS-CoV-2 on surfaces and in the air. These technologies were deployed in hospitals and occupational settings. This work further reflects my continued engagement in applied public health science.

I am not employed by, retained by, nor financially tied to any insurance company or insurance coverage interests. I am now retired and engage only selectively in scientific and public health matters of professional interest. As a scientist, my focus has always been—and remains—on evolving science and its implications for public health protection.

It appears that the ACTS Law Firm's characterization of my work may have relied, in part, on a December 2025 New York Times article that is itself biased and factually inaccurate. Reliance on such secondary and flawed sources to discredit scientific professionals is inappropriate, particularly in formal proceedings.

I strongly object to the misrepresentation of my credentials, experience, and scientific work. I respectfully request that any references to my name or opinions, as presented by the ACTS Law Firm, be withdrawn from consideration unless corrected to accurately reflect my qualifications and body of work. I further request that appropriate remedial steps be taken to address the reputational harm caused by these misstatements.

Thank you for your attention to this matter.

Sincerely,

Richard L. Wade, PhD, MPH  
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National Associate, National Academy of Sciences  
Retired Adjunct Clinical Professor of Medicine  
University of California, Irvine School of Medicine  
Principal Scientist

Phone: 714-299-7514  
(Resume and publications attached)