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BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the Request for Finding
Eligibility to Seek Compensation of:

Consumer Watchdog.

**CONSUMER WATCHDOG’S REQUEST
FOR FINDING OF ELIGIBILITY TO
SEEK COMPENSATION**

[Ins. Code §1861.10; Cal. Code Regs, tit. 10,
§ 2662.2]

Consumer Watchdog hereby requests an updated finding of eligibility to seek compensation in proceedings before the California Department of Insurance (“CDI”).¹ This request is based on the facts as set forth herein, the attached exhibits, and the accompanying verification of Pamela Pressley.

CONSUMER WATCHDOG MEETS THE LEGAL STANDARDS FOR A REQUEST FOR ELIGIBILITY SHOWING THAT IT REPRESENTS THE INTERESTS OF CONSUMERS

1. Proposition 103 was enacted to ensure that insurance is fair, available, and affordable for all Californians. (*State Farm Mutual Automobile Ins. Co. v. Garamendi* (“*Garamendi*”) (2004) 32 Cal.4th 1029, 1045, emphasis added.) “To achieve this goal, the drafters established a public hearing process for reviewing insurance rate changes In doing so, the drafters sought to enable consumers

¹ The Commissioner last issued his Finding of Eligibility to Seek Compensation on August 2, 2024, effective in proceedings commenced within two years of July 12, 2024, in which he found Consumer Watchdog “eligible to seek compensation in Department proceedings under Insurance Code section 1861.10.”

1 to permanently unite to fight against insurance abuse.” (*Ibid.*, internal citations omitted.) Proposition
2 103 and the intervenor regulations expressly provide for consumer participation in proceedings before
3 the Department and the courts: “[a]ny person may initiate or intervene in any proceeding permitted or
4 established pursuant to this chapter, challenge any action of the commissioner under this article, and
5 enforce any provision of this article.” (Ins. Code § 1861.10(a).)² To further encourage public
6 participation, section 1861.10(b) requires awards of reasonable advocacy and witness fees and expenses
7 for any person who “represents the interests of consumers” and “has made a substantial contribution to
8 the adoption of any order, regulation, or decision by the commissioner or a court.”

9 2. As previous insurance commissioners and the courts have consistently recognized, the
10 involvement and advocacy of “consumer representatives is an important tool to ensure that [insurance
11 companies] comply with the statutory and regulatory prohibition on ‘excessive, inadequate, and
12 unfairly discriminatory’ rates, or rates that otherwise violate the law[.]” (*Assn. of California Ins.*
13 *Cos. v. Poizner* (2009) (“*ACIC*”) 180 Cal.App.4th 1029, 1041.) Per the voters’ instruction, the mandate
14 of section 1861.10(b), like all of the provisions of Proposition 103, must be “liberally construed and
15 applied in order to fully promote its underlying purposes.” (Prop 103, Uncodified Section 8(a).)
16 Accordingly, courts have repeatedly construed section 1861.10(a) and other provisions of Proposition
17 103 in a manner “consistent with Proposition 103’s goal of fostering consumer participation in the rate-
18 setting process.” (*Garamendi, supra*, 32 Cal.4th at 1045; see also *ACIC, supra*, 180 Cal.App.4th at
19 1052 [stating “the goal of fostering consumer participation in the administrative rate-setting process” as
20 “one of the purposes of Proposition 103”]; *Econ. Empowerment Found. v. Quackenbush* (“*EEF*”)
21 (1997) 57 Cal.App.4th 677, 686 [interpreting section 1861.10(b) in a manner “which best facilitates
22 compensation” consistent with the purpose of the statute “to encourage consumers to participate in
23 insurance rate proceedings by compensating them for their contribution”]; *State Farm Gen. Ins. Co. v.*
24 *Lara* (“*SFG*”) (2021) 71 Cal.App.5th 197, 217 [construing “substantial contribution” standard
25 consistent with purpose of “broad consumer participation”].)

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² All further statutory references are to the Insurance Code.

1 3. Under the applicable regulations, Cal. Code Regs., title 10 (“10 CCR”), section 2662.2,³
2 intervenors intending to seek compensation in proceedings before the Department may submit “a
3 request for finding of eligibility to seek compensation” that must include specified documents and
4 information to meet the threshold showing that the group “represents the interests of consumers.” As
5 applicable to the intervenor regulations, section 2661.1 broadly defines “represents the interests of
6 consumers” to mean that “the intervenor represents the interests of individual insurance consumer[s], or
7 the intervenor is a group organized for the purpose of consumer protection as demonstrated by, but is
8 not limited to [sic], a history of representing consumers in administrative, legislative or judicial
9 proceedings.” The sole purpose of the request for finding of eligibility is to obtain a preliminary
10 determination that a person or organization does in fact represent consumers for purposes of submitting
11 a request for compensation at the conclusion of a Departmental proceeding; such a finding is valid in
12 any proceeding commenced within two years of the finding. (10 CCR § 2662.2(d).)

13 4. Section 2662.2(a)(1) provides that the request include “a showing by the intervenor or
14 participant that it represents the interests of consumers, including a description of the previous work of
15 the intervenor or participant[.]” This Request includes substantial information satisfying this
16 requirement to show it is a group organized for the purpose of consumer protection as demonstrated by,
17 but not limited to, its history of representing consumers in administrative, legislative, or judicial
18 proceedings, including summaries of the different categories of work Consumer Watchdog has
19 performed and continues to perform on behalf of consumers (§ 6, 10, 12–13, *infra*; Exh. C); specific
20 civil cases Consumer Watchdog has initiated and/or intervened in to enforce Proposition 103’s
21 consumer protection mandates (*id.*, § 10, fn. 11, *infra*); a list of over 140 rate and rulemaking
22 proceedings in which Consumer Watchdog has intervened before the Department over the last three
23 decades; collectively, the rate proceedings in which Consumer Watchdog intervened since 2002 have
24 resulted in over \$7.2 billion in annual premium savings for consumers as compared to the rates
25 originally sought by the insurance companies (§ 13, *infra*);⁴ and a summary of highlights of Consumer
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27
28 ³ All further regulation references are to Title 10 of the California Code of Regulations.

⁴ See <https://consumerwatchdog.org/wp-content/uploads/2026/05/Prop103-SavingsAndFees-Chart.pdf>.

1 Watchdog’s work and victories representing consumers in administrative, legislative, and judicial
2 proceedings since filing its previous Request for Eligibility on June 3, 2024 (Exh. C).

3 5. Section 2662.2(a)(2) specifies a list of additional information and documents that the
4 Request must contain, all of which Consumer Watchdog has provided in paragraph 15 below and the
5 appended Exhibits A–E.

6 **CONSUMER WATCHDOG IS ORGANIZED FOR THE PURPOSE OF CONSUMER**
7 **PROTECTION AND HAS AN OVER 30-YEAR HISTORY OF REPRESENTING THE**
8 **INTERESTS OF CONSUMERS IN ADMINISTRATIVE, LEGISLATIVE, AND JUDICIAL**
9 **PROCEEDINGS**

10 6. Consumer Watchdog is a 501(c)(3) nonprofit, nonpartisan, public interest corporation
11 organized to represent the interests of taxpayers and consumers. In 1985, Consumer Watchdog was
12 founded as a California-based non-profit organization to conduct educational, litigation, and research
13 activities on consumer and public interest issues, including but not limited to issues affecting consumer
14 protection and environmental and government reform.⁵ Over the years, Consumer Watchdog has fought
15 to save consumers more than \$7.2 billion on their insurance premiums, exposed and changed the
16 inhumane practices of health insurance companies, prevented oil companies from ripping off motorists,
17 won privacy protections for consumers, and blocked taxpayer bailouts of utility companies. One of
18 Consumer Watchdog’s chief missions is to represent the interests of insurance policyholders,
19 particularly as they relate to the implementation and enforcement of Proposition 103 in matters before
20 the Legislature, the courts, and the CDI. In *just the last two years*, as documented in Exhibit C to this
21 Request, Consumer Watchdog:

- 22 • Saved policyholders over \$1.15 billion by intervening to challenge excessive rate hikes under
23 Prop 103, including in:
 - 24 ○ *In the Matters of the Rate Applications of State Farm Gen. Ins. Co.*, PA-2025-00011,
25 PA-2025-00012, and PA-2025-00013 (executed settlement filed with Admin. Hearing
26

27 ⁵ Consumer Watchdog was originally incorporated as The Network Project in 1985, changed its name
28 to The Foundation for Taxpayer and Consumer Rights in 1998, and changed its name to Consumer
Watchdog in 2008. (See Exh. A [Articles of Incorporation and amendments].)

Bureau), resulting in an annual savings of \$530 million in homeowners, rental dwelling, and renters and condo insurance premiums;

- *In the Matter of the Rate Application of Stillwater Insurance Company*, PA-2025-00003 (Cal. Ins. Comm'r 2025), resulting in annual savings of \$13.2 million in homeowners, renters, and condo insurance premiums;
- *In the Matters of the Rate Applications of United Servs. Auto. Assn., Garrison Property and Cas. Ins. Co., and USAA Cas. Ins. Co.*, PA-2024-00007, PA-2024-00008, and PA-2024-00009 (Cal. Ins. Comm'r 2025), resulting in annual savings of \$114 million in auto insurance premiums;
- *In the Matter of the Rate Application of General Ins. Co. of Am.*, PA-2024-00014 (Cal. Ins. Comm'r 2025), resulting in annual savings of \$30 million in homeowners insurance premiums;
- *In the Matter of the Rate Application of United Fin. Cas. Co.*, PA-2024-00003 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$47.5 million in auto insurance premiums;
- *In the Matter of the Rate and Rule Application of State Farm Mut. Auto. Ins. Co.*, PA-2024-00010 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$326 million in auto insurance premiums;
- *In the Matter of the Rate Application of United Servs. Auto. Assn.*, PA-2023-00023 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$10.4 million in homeowners insurance premiums;
- *In the Matter of the Rate Application of Liberty Ins. Corp.*, PA-2023-00016 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$31.1 million in homeowners insurance premiums;
- *In the Matter of the Rate Applications of 21st Century Ins. Co. and 21st Century Cas. Co.*, PA-2024-00006 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$11.4 million in auto insurance premiums; and

- 1 ○ *In the Matter of the Rate, Rule, and Form Application of Liberty Mut. Fire Ins. Co.*, PA-
2 2024-00004 (Cal. Ins. Comm’r 2024), resulting in annual savings of \$38.4 million in
3 auto insurance premiums.
- 4 • Participated in the pre-application required information determination (“PRID”) procedure of
5 two companies seeking to implement use of their wildfire models in the ratemaking proceedings
6 of insurance companies within the state as the only consumer representative to do so in *In the*
7 *Matter of the PRID Procedure of AIR Worldwide Corporation d/b/a Verisk Extreme Event*
8 *Solutions*, PRID-2025-00001 (Cal. Ins. Comm’r 2025) and *In the Matter of the PRID Procedure*
9 *of Moody’s*, PRID-2025-00002 (Cal. Ins. Comm’r 2025).
 - 10 • Represented the public’s interest in Department of Insurance rulemaking proceedings,
11 submitting extensive written and oral comments and legal analysis, regarding the proposed
12 “Intervenor and AHB Fairness and Accountability” regulations, REG-2025-00006, and
13 submitting oral and written comments on the final proposed and amended regulations
14 regarding the “Catastrophe Modeling and Ratemaking” regulations, REG-2023-00010.
 - 15 • Represented the public’s interest through the conclusion and settlement of a seven-year matter
16 regarding the rating practices of Allstate in *In the Matter of the Rating Practices of Allstate Ins.*
17 *Co. and Allstate Indemnity Co.*, NC-2018-00001 (Cal. Ins. Comm’r 2025).
 - 18 • Filed amicus briefs at every level of federal court — the Northern District of California, the
19 Ninth Circuit, the D.C. Circuit, and the United States Supreme Court — challenging the
20 constitutional validity of sweeping federal tariffs imposed without congressional authorization.
21 Consumer Watchdog’s briefs argued that the executive branch’s unilateral assertion of
22 unlimited tariff-setting power under IEEPA violated the non-delegation doctrine and the
23 separation of powers: the power to tax — and tariffs are taxes — is vested in Congress, not the
24 President. The Supreme Court agreed, striking down the emergency tariffs in a ruling that
25 adopted the core arguments of Consumer Watchdog’s brief. Consumer Watchdog has since
26 filed a further amicus brief in the Supreme Court challenging unlawful tariff “modifications”
27 that seek to accomplish through executive sleight-of-hand what the Court already held the
28 executive cannot do directly. These unconstitutional tariffs functioned as a regressive tax on

1 California families and small businesses — falling hardest on those least able to absorb higher
2 prices on imported goods, auto parts, building materials, and consumer staples — making
3 Consumer Watchdog’s constitutional challenge an extension of its core mission to protect
4 consumers from unlawful exactions, whether imposed by insurers or by government actors
5 exceeding their lawful authority.

- 6 • Sued the five largest oil refiners operating in California in federal court for working together to
7 inflate the reported compliance cost of the state’s Low Carbon Fuel Standard (“LCFS”)
8 program, and to pass those inflated costs on to California consumers through increased gasoline
9 prices in *Herold v. Chevron Corp.*, No. 25-cv-10282 (N.D. Cal. filed Nov. 26, 2025).

10 In 13 of the above rate proceedings concluding since the submission of its last eligibility request
11 in June 2024, Consumer Watchdog’s advocacy was instrumental in reaching Settlement Stipulations
12 with the Department and the insurance company Applicants pursuant to which the Commissioner
13 approved lower overall rates than originally requested by the companies.⁶ In each of those Stipulations,
14 the parties expressly agreed that the stipulated rates were supportable and neither excessive nor
15 inadequate under the applicable regulations.⁷ Moreover, Consumer Watchdog has consistently
16 advocated for companies to make insurance rates and supporting documentation more transparent
17 through compliance with Insurance Code section 1861.07’s public disclosure requirements.⁸ And, in its
18 written and oral comments in the workshops and rulemaking hearings over the last two years regarding
19 the CDI’s proposed “Catastrophe Modeling and Ratemaking” regulations (REG-2023-00010) and
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22 ⁶ See 2024–2026 Settlement Stipulations in 13 CDI rate proceedings,
<https://consumerwatchdog.org/wp-content/uploads/2026/05/2024-26-Settlements.pdf>.

23 ⁷ *Ibid.*

24 ⁸ E.g., *In the Matter of the Rate Application of Allstate Ins. Co.*, PA-2023-00011 (Cal. Ins. Comm’r
25 2024); *In the Matter of the Rate Application of CSAA Ins. Exch.*, PA-2024-00001 and PA-2023-00010
26 (Cal. Ins. Comm’r 2025); *In the Matter of the Rate and Rule Application of Cal. Auto. Ins. Co.*, PA-
27 2025-00011 (Cal. Ins. Comm’r 2026); *In the Matter of the Rate Application of Cal. Cas. Indemnity*
28 *Exch.*, PA-2025-00012 (Cal. Ins. Comm’r 2026); *In the Matter of the Rate Application of CSAA Ins.*
Exch., PA-2024-00002 (Cal. Ins. Comm’r 2026); *In the Matter of the PRID Procedure of AIR*
Worldwide Corporation d/b/a Verisk Extreme Event Solutions, PRID-2025-00001 (Cal. Ins. Comm’r
2025); and *In the Matter of the PRID Procedure of Moody’s*, PRID-2025-00002 (Cal. Ins. Comm’r
2025).

1 proposed “Intervenor and Administrative Hearing Bureau” regulations (REG-2025-00006), Consumer
2 Watchdog has consistently advocated for consumers’ interests in favor of public disclosure of models
3 that are used to determine rates and premiums in order to determine their reliability, and fair standards
4 that promote consumer participation in Department proceedings in a manner consistent with
5 Proposition 103’s mandates.⁹

6 7. Consumer Watchdog’s founder wrote Proposition 103 and led the successful campaign
7 for its enactment by California voters in 1988. Consumer Watchdog’s staff and consultants include
8 some of the nation’s foremost consumer advocates and experts on insurance ratemaking matters.¹⁰

9 8. Consumer Watchdog is primarily funded by: 1) contributions from members of the
10 public throughout California; 2) grants; 3) awards of attorneys’ fees and expenses; and 4) intervenor
11 funding. (See Exhibit E attached hereto for approximate percentages of Consumer Watchdog’s overall
12 budget.) Other than the interests of consumers, Consumer Watchdog represents no other interests.

13 9. Consumer Watchdog has served as a public watchdog with regard to insurance rates and
14 insurer rollback liabilities under Proposition 103 by: monitoring rollback settlements and the status of
15 the rollback regulations; reviewing and challenging rate filings made by insurers seeking excessive rate
16 changes; participating in rulemaking and adjudicatory hearings before the CDI; bringing and joining
17 civil lawsuits to ensure proper application of Proposition 103; bringing and joining actions to overturn
18 legislative acts that do not further the purpose of Proposition 103; and educating the public concerning
19

20 ⁹ See Press Release, Consumer Watchdog, Homeowners Dropped by Insurers and Facing Massive Rate
21 Hikes Speak Out (Sept. 17, 2024),
22 [https://consumerwatchdog.org/insurance/homeowners-dropped-by-insurers-and-facing-massive-rate-](https://consumerwatchdog.org/insurance/homeowners-dropped-by-insurers-and-facing-massive-rate-hikes-speak-out-consumer-watchdogs-say-lara-lied-about-expanding-wildfire-coverage-in-exchange-for-higher-rates/)
23 [hikes-speak-out-consumer-watchdogs-say-lara-lied-about-expanding-wildfire-coverage-in-exchange-](https://consumerwatchdog.org/insurance/homeowners-dropped-by-insurers-and-facing-massive-rate-hikes-speak-out-consumer-watchdogs-say-lara-lied-about-expanding-wildfire-coverage-in-exchange-for-higher-rates/)
24 [for-higher-rates/](https://consumerwatchdog.org/insurance/homeowners-dropped-by-insurers-and-facing-massive-rate-hikes-speak-out-consumer-watchdogs-say-lara-lied-about-expanding-wildfire-coverage-in-exchange-for-higher-rates/); Press Release, Consumer Watchdog, Lara’s Revenge Regulation Will Gut Public
25 Participation in Insurance Rate-Making, Consumer Watchdog Says at Hearing Today (Nov. 20, 2025),
26 [https://consumerwatchdog.org/in-the-courtroom/laras-regulation-will-gut-public-participation-in-](https://consumerwatchdog.org/in-the-courtroom/laras-regulation-will-gut-public-participation-in-insurance-rate-making-consumer-watchdog-says-at-hearing-today/)
27 [insurance-rate-making-consumer-watchdog-says-at-hearing-today/](https://consumerwatchdog.org/in-the-courtroom/laras-regulation-will-gut-public-participation-in-insurance-rate-making-consumer-watchdog-says-at-hearing-today/); Press Release, Consumer
28 Watchdog, Thirty-two Groups Urge Insurance Commissioner to Withdraw Proposed Intervenor
Regulations; Rules Would Undermine \$530 Million State Farm Settlement (March 12, 2026),
[https://consumerwatchdog.org/insurance/thirty-two-groups-urge-insurance-commissioner-to-withdraw-](https://consumerwatchdog.org/insurance/thirty-two-groups-urge-insurance-commissioner-to-withdraw-proposed-intervenor-regulations-rules-would-undermine-530-million-state-farm-settlement/)
[proposed-intervenor-regulations-rules-would-undermine-530-million-state-farm-settlement/](https://consumerwatchdog.org/insurance/thirty-two-groups-urge-insurance-commissioner-to-withdraw-proposed-intervenor-regulations-rules-would-undermine-530-million-state-farm-settlement/).

¹⁰ A listing of Consumer Watchdog’s staff, including bios, is available on Consumer Watchdog’s
website: <https://consumerwatchdog.org/our-team/>.

industry underwriting and rating practices and their rights under Proposition 103 and other provisions of state law.

10. Consumer Watchdog and its attorneys have participated in virtually every lawsuit concerning Proposition 103's constitutionality and scope to uphold its protections for consumer policyholders.¹¹

11. In addition to lawsuits concerning Proposition 103's constitutionality and scope, Consumer Watchdog's attorneys advocate for consumers' rights and hold corporations accountable in federal and state courts.

12. Over the last several decades, Consumer Watchdog has initiated and/or intervened in numerous rate, noncompliance, and rulemaking proceedings representing the interests of consumers before the CDI related to the implementation and enforcement of Proposition 103's reforms, including but not limited to: (i) REB-5184, regarding State Farm's rollback liability; (ii) RH-318 and IH-93-3-REB, regarding regulations to implement Insurance Code section 1861.02's provisions on rating factors for personal automobile insurance; (iii) RH-339 and RH-341, regarding procedural rules for rate hearings and for intervention; (iv) PA-95-0057-00, regarding Safeco's Earthquake Rate Application; (v) Consolidated hearing numbers PA-97-0077-00, PA-97-007800, and PA-97-007900, regarding State Farm's, Allstate's, and Farmers' automobile class plans, respectively; (vi) PA-97-0072, regarding the California Earthquake Authority's rate application; (vii) RH-346, regarding regulations governing Advisory Organization Manuals; (viii) IH-97-0017-REB, regarding prior approval regulations, and IH-0017-TF, regarding Prior Approval Task Force; (ix) IH-97-0018-REB; (x) PA-98-0099-00, regarding Allstate's Private Passenger Automobile Insurance Rate Application;

¹¹ Examples include: *Calfarm Ins. Co. v. Deukmejian* (1989) 48 Cal. 3d 805; *20th Century Ins. Co. v. Garamendi* (1994) 8 Cal.4th 216; *Amwest Surety Ins. Co. v. Wilson* (1995) 11 Cal.4th 1243; *Proposition 103 Enforcement Project v. Quackenbush* (1998) 64 Cal.App.4th 1473; *Spanish Speaking Citizens' Foundation v. Low* (2000) 85 Cal.App.4th 1179; *Donabedian v. Mercury Insurance Co.* (2004) 116 Cal.App.4th 968; *State Farm Mutual Automobile Ins. Co. v. Garamendi* (2004) 32 Cal.4th 1029; *The Foundation for Taxpayer and Consumer Rights v. Garamendi* (2005) 132 Cal.App.4th 1354; *Association of California Insurance Companies v. Poizner* (2009) 180 Cal.App.4th 1029; *Mercury Casualty Co. v. Jones* (2017) 8 Cal.App.5th 561; *Mercury Ins. Co. v. Lara* (2019) 35 Cal.App.5th 82; and *State Farm General Ins. Co. v. Lara* (2021) 71 Cal.App.5th 197.

(xi) RH-402 (initiated by Consumer Watchdog), regarding regulations clarifying the optional automobile rating factor of persistency and the conflict of certain rating factors with Ins. Code § 1861.02(c); (xii) RH-01015532, regarding accident verification regulations; (xiii) RH-01018834, regarding auto rating factors weighting methodologies; (xiv) PA-02025379, regarding SCPIE's medical malpractice insurance rate application; (xv) RH-03026431, RH-03026432, and RH-05042665, regarding Low Cost Automobile Insurance Rates and Coverages; (xvi) PA-04036735 regarding the medical malpractice insurance rate application of The Medical Protective Company; (xvii) PA04039736, regarding American Casualty's medical malpractice rate application; (xviii) PA04041210, regarding Safeco's 2004 earthquake rate application; (xix) PA05045074, regarding Medical Protective's 2005 medical malpractice insurance rate application; (xx) NC03029253, regarding the rates, rating plans, or rating systems of Farmers Insurance Exchange, et al.; (xxi) PA06093080, PA06093079, PA06093078, and PA06092759, regarding the homeowners rates of Safeco, Allstate, Fire Insurance Exchange, and State Farm; (xxii) PA-2006-00006 and PA-2007-00004, regarding Allstate's 2006 homeowners' and private passenger automobile insurance rate applications; (xxiii) PA-2007-00008, regarding GeoVera Insurance Company's earthquake rate application; (xxiv) PA-2007-00013, regarding Explorer Insurance Company's private passenger automobile "Universal" program; (xxv) PA-2007-00017, regarding Fireman's Fund's homeowner's rate application; (xxvi) PA-2007-00019, regarding Fireman's Fund's earthquake rate application; (xxvii) PA-2008-00032, regarding the rates, rules, and rating plans of Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange; (xxviii) PA-2008-00037, regarding the automobile rate applications of California Automobile Insurance Company, Mercury Casualty Company, and Mercury Insurance Company; (xxix) PA-2008-00038, regarding Allstate's "Your Choice Auto" program; (xxx) PA-2009-00009, regarding Mercury's homeowners' insurance rate application; (xxxi) REG-2010-00018, regarding regulations governing group insurance under Ins. Code § 1861.12; (xxxii) PA-2010-00001, regarding the homeowners' insurance rate application of Safeco Insurance Company; (xxxiii) PA-2010-00002 and PA-2010-00003, regarding the rate applications of Encompass Insurance Company; (xxxiv) PA-2010-00008, regarding the homeowners' insurance rate applications of Garrison Property and Casualty Insurance Company, United Services

1 Automobile Association, USAA Casualty Insurance Company, and USAA General Indemnity
2 Company; (xxxv) PA-2010-00010, regarding the homeowners' insurance rate application of Travelers'
3 Property Casualty Insurance Company; (xxxvi) REG-2010-00011, regarding regulations governing
4 determination of fault by auto insurers; (xxxvii) PA-2010-00013, regarding the automobile rate
5 application of GEICO General Insurance Company; (xxxviii) PA-2010-00014, regarding the
6 homeowners' insurance rate application of California State Automobile Association Inter-Insurance
7 Bureau; (xxxix) PA-2011-00005, regarding the rate applications of American Automobile Insurance
8 Company, Associated Indemnity Corporation, Fireman's Fund Insurance Company, National Surety
9 Corporation, and The American Insurance Company; (xl) PA-2011-00006, regarding the medical
10 malpractice rate application of The Doctors Company; (xli) PA-2011-00007, regarding the medical
11 malpractice rate application of NORCAL Mutual Insurance Company; (xlii) PA-2011-00008,
12 regarding the medical malpractice rate application of The Medical Protective Company; (xliii) PA-
13 2011-00009, regarding the automobile rate application of Progressive West Insurance Company; (xliv)
14 OV-2011-00076, regarding proposed regulations governing the scope of prior approval of insurance
15 rates; (xlv) PA-2011-00011 and PA-2011-00013, regarding the automobile rate and class plan filings
16 of Allstate Insurance Company and affiliates; (xlvi) PA-2011-00014, regarding the automobile rate
17 filings of Infinity Insurance Company; (xlvii) PA-2011-00016, regarding the automobile rate filings
18 of Mercury Casualty Company and affiliates; (xlviii) PA-2011-000015, regarding the earthquake rate
19 filings of Chartis Property and Casualty; (xlix) PA-2011-00010, regarding State Farm General's
20 homeowners rate application; (l) PA-2011-00017, regarding the new program filing of Mercury
21 affiliate California General Underwriters Insurance Co. Inc.; (li) PA-2012-00002, regarding the
22 earthquake rate filing of Federal Insurance Company and affiliates; (lii) PA-2012-00006, regarding
23 the automobile rate filing of State Farm Mutual Automobile Insurance Company; (liii) PA-2012-
24 00010, regarding the automobile rate filing of Coast National Insurance Company; (liv) PA-2012-
25 00008, regarding the automobile rate filing of Progressive West Insurance Company; (lv) PA-2012-
26 00011, regarding the automobile rate filing of Farmers Insurance Exchange and affiliates; (lvi) PA-
27 2013-00002, regarding the automobile rate filing of GEICO Indemnity Company; (lvii) PA-2013-
28 0003, regarding the automobile rate application of Allstate Insurance Company; (lviii) PA-2013-

00004, regarding the homeowners rate application of Mercury Casualty Company; (lix) PA-2013-00012, regarding the homeowners rate application of State Farm General; (lx) PA-2013-00010, regarding the homeowners rate application of USAA and affiliated companies; (lxi) PA-2014-00001, regarding the automobile class plan application of Farmers Specialty Insurance Company; (lxii) REG-2014-00004, regarding the proposed 2014 rates for the Low Cost Automobile Insurance Plan; (lxiii) PA-2014-00004, regarding the automobile rate application of Metropolitan Direct Property and Casualty Insurance Company; (lxiv) PA-2014-00005, regarding the homeowners rate application of CSAA Insurance Exchange; (lxv) PA-2014-00008, regarding the homeowners rate application of Allstate Insurance Company; (lxvi) PA-2014-00010, regarding the automobile rate application of Mercury Insurance Company; (lxvii) PA-2015-00004, regarding the homeowners rate application of State Farm General Insurance Company; (lxviii) PA-2015-00005, regarding the rate application of Explorer Insurance Company; (lxix) PA-2015-00006, regarding the class plan and rate applications of Coast National Insurance Company; (lxx) PA-2015-00008, regarding the rate application of Low Cost Automobile Insurance Program; (lxxi) PA-2015-00009, regarding the rate applications of Allstate Insurance Company and Allstate Indemnity Company; (lxxii) PA-2015-00010, regarding the homeowners rate application of Allied Property and Casualty Insurance Company and AMCO Insurance Company; (lxxiii) PA-2016-00002, regarding the homeowners rate application of United Financial Casualty Company; (lxxiv) PA-2016-00001, regarding the homeowners rate application of AIG Property Casualty Company; (lxxv) PA-2016-00004, regarding the commercial multi-peril rate applications of State Farm General Insurance Company; (lxxvi) PA-2016-00007, regarding the automobile class plan applications of Progressive Select Insurance Company and United Financial Casualty Company; (lxxvii) PA-2016-00008, regarding the homeowners rate applications of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance Company; (lxxviii) PA-2016-00010, regarding the homeowners rental dwelling rate application of State Farm General Insurance Company; (lxxix) REG-2016-00011, regarding the proposed 2016 rates for the Low Cost Automobile Insurance Plan; (lxxx) PA-2017-00005, regarding the automobile rate application of GEICO Casualty Company; (lxxxi) PA-2017-00006, regarding the automobile rate applications of GEICO Indemnity Company, GEICO Casualty Company, GEICO General Insurance Company, and

1 Government Employees Insurance Company; (lxxxii) PA-2017-00010, regarding the commercial
2 multi-peril rate applications of The Travelers Indemnity Company and Connecticut and Travelers
3 Property Casualty Company of America; (lxxxiii) PA-2017-00016, regarding the automobile rate
4 application of Loya Casualty Insurance Company; (lxxxiv) PA-2018-00001, regarding the automobile
5 class plan applications of Liberty Mutual Fire Insurance Company; (lxxxv) PA-2017-00007, regarding
6 the automobile rate application of Liberty Mutual Fire Insurance Company; (lxxxvi) PA-2018-00006,
7 regarding the automobile rate application of Alliance United Insurance Company; (lxxxvii) PA-2017-
8 0009, regarding the automobile class plan applications of Mercury Insurance Company and California
9 Automobile Insurance Company; (lxxxviii) PA-2019-00004, regarding the automobile rate
10 applications of Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance
11 Exchange; (lxxxix) PA-2019-00001 and PA-2019-00003, regarding the homeowners rate applications
12 of Pacific Specialty; (xc) PA-2020-00001, regarding the automobile rate application of Esurance;
13 (xci) REG-2018-000020, regarding gender non-discrimination in automobile insurance rating
14 regulations; (xcii) PA-2018-00004, regarding the automobile class plan application of State Farm
15 Mutual Automobile Insurance Company; (xciii) PA-2018-00005, regarding the homeowners rate
16 application of State Farm General Insurance Company; (xciv) PA-2020-00002, regarding the medical
17 malpractice rate application of NORCAL Mutual Insurance Company; (xcv) PA-2019-00006,
18 regarding the homeowners rate application of State Farm General Insurance Company; (xcvi) PA-
19 2020-00007, regarding the dental medical malpractice rate application of American Casualty
20 Company of Reading, Pennsylvania; (xcvii) PA-2019-00008, regarding the homeowners rate
21 applications of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance
22 Company; (xcviii) PA-2020-00010, regarding the dwelling fire rule and form application of Pacific
23 Specialty; (xcix) PA-2020-00006, regarding the homeowners new programs application of Farmers
24 Insurance Exchange and Fire Insurance Exchange; (c) PA-2020-00003, regarding the homeowners rate
25 application of Homesite Insurance Company of California; (ci) PA-2020-00004, regarding the renters
26 and condominiums new program applications of Farmers Insurance Exchange and Fire Insurance
27 Exchange; (cii) PA-2021-00002, regarding the homeowners rate and rating plan application of CSAA
28 Insurance Exchange; (ciii) PA-2021-00007, regarding the fire and allied lines rate applications of

1 Farmers Insurance Exchange, Fire Insurance Exchange and Mid-Century Insurance Company;
2 (civ) PA-2022-00006, regarding the automobile rate applications of GEICO Indemnity Company,
3 GEICO Casualty Company, GEICO General Insurance Company, and Government Employees
4 Insurance Company; (cv) PA-2022-00004, regarding the automobile rate application of Mercury
5 Insurance Company; (cvi) PA-2022-00008, regarding the automobile rate application of California
6 Automobile Insurance Company; (cvii) PA-2021-00003, regarding the medical malpractice rate and
7 rule application of Medical Insurance Exchange of California; (cviii) PA-2022-00010, regarding the
8 automobile rate application of State Farm Mutual Automobile Insurance Company; (cix) PA-2022-
9 00007, regarding the homeowners rate applications of Farmers Insurance Exchange, Fire Insurance
10 Exchange, and Mid-Century Insurance Company; (cx) PA-2022-00005, regarding the automobile rate
11 application of Interinsurance Exchange of the Automobile Club; (cxi) PA-2021-00004, regarding the
12 homeowners rate application of USAA-Casualty Insurance Company and Garrison Property and
13 Casualty Insurance Company; (cxii) PA-2022-00002, regarding the homeowners rate applications of
14 First National Insurance Company of America, Safeco Insurance Company of America, and Safeco
15 Insurance Company of Illinois; (cxiii) PA-2021-00005, regarding the homeowners rate application of
16 Allstate Insurance Company; (cxiv) PA-2023-00003, regarding the automobile rate applications of
17 Infinity Insurance Company; (cxv) PA-2023-00004, regarding the automobile rate application of
18 CSAA Insurance Exchange; (cxvi) PA-2023-00008, regarding the automobile rate applications of
19 Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange;
20 (cxvii) PA-2023-00009, regarding the homeowners rate applications of Farmers Insurance Exchange,
21 Fire Insurance Exchange, and Mid-Century Insurance Company; (cxviii) PA-2023-00006, regarding
22 the renters rate application of State Farm General Insurance Company; (cxix) PA-2023-00014,
23 regarding the automobile rate application of Allstate Northbrook Indemnity Company; (cxx) PA-2020-
24 00009, regarding the homeowners rate, rule, and form application of Pacific Specialty Insurance
25 Company; (cxxi) PA-2023-00007, regarding the rate application of State Farm General Insurance
26 Company; (cxxii) PA-2023-00022, regarding the automobile rate applications of Farmers Insurance
27 Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange; (cxxiii) PA-2023-
28 00012, regarding the automobile rate application of State Farm Mutual Automobile Insurance

1 Company; (cxxxiv) PA-2023-00013, regarding the automobile rate applications of GEICO Indemnity
2 Company, GEICO Casualty Company, GEICO General Insurance Company, and Government
3 Employees Insurance Company; (cxxxv) PA-2023-00021, regarding the automobile rate application of
4 CSAA Insurance Exchange; (cxxxvi) PA-2023-00017, regarding the homeowners rate application of
5 the Standard Fire Insurance Company; (cxxxvii) NC-2017-00003, regarding the rating practices of
6 Farmers Insurance Company and Mid-Century Insurance Company; (cxxxviii) REG-2020-00015 and
7 REG-2020-00016, rulemaking hearings regarding mitigation in rating plans and wildfire risk models;
8 (cxxxix) PA-2024-00005, regarding the homeowners rule application to implement property- and
9 community-level wildfire mitigation discounts of State Farm General Insurance Company; (cxxx) PA-
10 2024-00004, regarding the automobile rate, rule, and form application of Liberty Mutual Fire
11 Insurance Company; (cxxxxi) PA-2023-00011, regarding the homeowners rate application of Allstate
12 Insurance Company; (cxxxii) PA-2024-00006, regarding the automobile rate applications of 21st
13 Century Insurance Company and 21st Century Casualty Company; (cxxxiii) PA-2023-00016,
14 regarding the homeowners rate application of Liberty Insurance Corporation; (cxxxiv) PA-2023-
15 00023, regarding the homeowners rate application of United Services Automobile Association;
16 (cxxxv) PA-2024-00010, regarding the automobile rate and rule application of State Farm Mutual
17 Automobile Insurance Company; (cxxxvi) PA-2024-00003, regarding the automobile rate application
18 of United Financial Casualty Company; (cxxxvii) PA-2023-00015, regarding the homeowners rate and
19 rule applications to implement new property- and community-level mitigation designations and
20 discounts of Farmers Insurance Exchange, Fire Insurance Exchange, and Mid-Century Insurance
21 Company; (cxxxviii) PA-2024-00014, regarding the homeowners rate application of General
22 Insurance Company of America; (cxxxiv) PA-2024-00007, PA-2024-00008, and PA-2024-00009,
23 regarding the automobile rate applications of Garrison Property and Casualty Insurance Company,
24 United Services Automobile Association, and USAA Casualty Insurance Company; (cxxxv) PA-2024-
25 00001, regarding the rule and rating plan application to implement new property- and community-
26 level mitigation designations and discounts of CSAA Insurance Exchange; (cxxxvi) PA-2025-00003,
27 regarding the homeowners rate application of Stillwater Insurance Company; (cxxxvii) PA-2025-
28 00011, regarding the homeowners rate and rule application of California Automobile Insurance

1 Company; (cxxxviii) PA-2025-00012, regarding the homeowners rate application of California
2 Casualty Indemnity Exchange; (cxxxix) NC-2018-00001, regarding the rating practices of Allstate
3 Insurance Company and Allstate Indemnity Company; (cxl) PA-2024-00002, regarding the
4 homeowners rate application proposing the implementation of a new wildfire scoring model of CSAA
5 Insurance Exchange; (cxli) PRID-2025-00001, regarding the pre-application required information
6 determination procedure of AIR Worldwide Corporation d/b/a Verisk Extreme Event Solutions; (cxlii)
7 PRID-2025-00002, regarding the pre-application required information determination procedure of
8 Moody's; (cxliii) REG-2019-00025, a rulemaking hearing regarding the implementation of
9 requirements that rate applications filed with the CDI be complete; (cxliv) REG-2023-00020, a
10 rulemaking hearing regarding the use of catastrophe modeling in rate applications filed with the CDI;
11 (cxlv) REG-2025-00006, a rulemaking hearing regarding the requirements of intervenors before CDI
12 among several others on file with the Department; and (cxlvi) PA-2024-00011, PA-2024-00012, and
13 PA-2024-00013, regarding the renters and condos, homeowners, and rental dwelling rate applications
14 of State Farm General Insurance Company.

15 13. Consumer Watchdog's interventions in rate proceedings before the Department of
16 Insurance have resulted in over \$7.2 billion in premium savings for consumers since 2002.¹²

17 14. On August 2, 2024, effective as of July 12, 2024, the Insurance Commissioner last
18 found Consumer Watchdog eligible to seek compensation in departmental proceedings, pursuant to
19 section 2662.2 of title 10 of the California Code of Regulations ("10 CCR"). This determination
20 succeeded prior determinations to the same effect issued by the CDI on July 26, 2022, effective as of
21 July 12, 2022; August 25, 2020, effective as of July 12, 2020; July 12, 2018; July 14, 2016; July 24,
22 2014; July 24, 2012; July 2, 2010; August 25, 2008; July 14, 2006; July 2, 2004; June 20, 2002;
23 October 1, 1997; September 26, 1995; September 27, 1994; and September 13, 1993. In 2024, the
24 Commissioner found that Consumer Watchdog made a substantial contribution to his decisions in
25 seven homeowners and auto insurance rate matters; in 2025, the Commissioner found that Consumer
26 Watchdog made a substantial contribution to his decisions in 23 homeowners, auto, and medical
27

28 ¹² See footnote 4, *supra*.

malpractice insurance rate matters; and most recently in 2026, the Commissioner found that Consumer Watchdog made a substantial contribution to his decision in a homeowners insurance rate matter.¹³

¹³ Decision Awarding Compensation (Oct. 18, 2024), *In the Matter of the Rate Applications of Farmers Ins. Exch., Mid-Century Ins. Co., and Truck Ins. Exch.*, PA-2023-00022; Decision Awarding Compensation (Dec. 6, 2024), *In the Matter of the Rate Application of State Farm Gen. Ins. Co.*, PA-2023-00006; Decision Awarding Compensation (Dec. 6, 2024), *In the Matter of the Rate Application of Allstate Northbrook Indemnity Co.*, PA-2023-00014; Decision Awarding Compensation (Dec. 6, 2024), *In the Matter of the Rate, Rule, and Form Application of Pacific Specialty Ins. Co.*, PA-2020-00009; Decision Awarding Compensation (Dec. 6, 2024), *In the Matter of the Rate Application of State Farm Gen. Ins. Co.*, PA-2023-00007; Decision Awarding Compensation (Dec. 6, 2024), *In the Matter of the Rate Application of State Farm Mut. Auto. Ins. Co.*, PA-2023-00012; Decision Awarding Compensation (Dec. 6, 2024), *In the Matter of the Rate Applications of Garrison Prop. and Cas. Ins. Co. and USAA Cas. Ins. Co.*, PA-2021-00004; Decision Awarding Compensation (Jan. 29, 2025), *In the Matter of the Rate Application of Liberty Ins. Corp.*, PA-2023-00016; Decision Awarding Compensation (Feb. 14, 2025), *In the Matter of the Rate Application of United Servs. Auto Assn.*, PA-2023-00023; Decision Awarding Compensation (May 16, 2025), *In the Matter of the Rate Applications of 21st Century Ins. Co. and 21st Century Cas. Co.*, PA-2024-00006; Decision Awarding Compensation (May 16, 2025), *In the Matter of the Rate and Rule Application of State Farm Mut. Auto. Ins. Co.*, PA-2024-00010; Amended Order Awarding Compensation (May 23, 2025), *In the Matter of the Rate Applications of GEICO Indemnity Co., GEICO Cas. Co., GEICO Gen. Ins. Co., and Government Employees Ins. Co.*, PA-2022-00006; *In the Matter of the Rate Application of Mercury Ins. Co.*, PA-2022-00004; *In the Matter of the Rate Application of Cal. Auto. Ins. Co.*, PA-2022-00008; *In the Matter of the Rate Application of Med. Ins. Exch. of Cal.*, PA-2021-00003; *In the Matter of the Rate Applications of First Nat. Ins. Co. of Am., Safeco Ins. Co. of Am., and Safeco Ins. Co. of Ill.*, PA-2022-00002; *In the Matter of the Rate Application of Allstate Ins. Co.*, PA-2021-00005; *In the Matter of the Rate Applications of Farmers Ins. Exch., Mid-Century Ins. Co., and Truck Ins. Exch.*, PA-2023-00008; *In the Matter of the Rate Applications of Farmers Ins. Exch., Fire Ins. Exch., and Mid-Century Ins. Co.*, PA-2023-00009; *In the Matter of the Rate Applications of Infinity Ins. Co.*, PA-2023-00003; *In the Matter of the Rate Applications of GEICO Indemnity Co., GEICO Cas. Co., GEICO Gen. Ins. Co., and Government Employees Ins. Co.*, PA-2023-00013; *In the Matter of the Rate Application of CSAA Ins. Exch.*, PA-2023-00021; *In the Matter of the Rate Application of The Standard Fire Ins. Co.*, PA-2023-00017; *In the Matter of the Rate Application of Liberty Mutual Fire Ins. Co.*, PA-2024-00004; and *In the Matter of the Rate Application of Allstate Ins. Co.*, PA-2023-00011; Decision Awarding Compensation (May 23, 2025), *In the Matter of the Rate Application of United Financial Cas. Co.*, PA-2024-00003; Decision Awarding Compensation (May 23, 2025), *In the Matter of the Rate/Rule Applications of Farmers Ins. Exch., Fire Ins. Exch., and Mid-Century Ins. Co.*, PA-2023-00015; Decision Awarding Compensation (July 3, 2025), *In the Matter of the Rate Application of General Ins. Co. of Am.*, PA-2024-00014; Decision Awarding Compensation (July 30, 2025), *In the Matter of the Rate Applications of United Servs. Auto. Assn., Garrison Prop. and Cas. Ins. Co., and USAA Cas. Ins. Co.*, PA-2024-00007, PA-2024-00008, PA-2024-00009; Decision Awarding Compensation (Dec. 24, 2025), *In the Matter of the Rule Change Application of CSAA Insurance Exchange*, PA-2024-00001; Decision Awarding Compensation (Jan. 9, 2026), *In the Matter of the Rate Application of Stillwater Ins. Co.*, PA-2025-00003.

1 **SUPPORTING DOCUMENTATION SUBMITTED IN COMPLIANCE WITH 10 CCR § 2662.2**

2 15. Pursuant to 10 CCR § 2662.2(a)(2), Consumer Watchdog provides the following
3 information and/or documentation pertaining to its organizational structure to be used by the CDI for
4 the sole purpose of determining its eligibility to seek compensation in CDI proceedings:

5 A. **10 CCR § 2662.2(a)(2)(A):** Consumer Watchdog has previously submitted its Articles of
6 Incorporation and amendments thereto, which have not been amended since the
7 Commissioner issued his last finding of eligibility for Consumer Watchdog in 2024. (See
8 1985 Articles of Incorporation, 1998 amendment changing name to Foundation for
9 Taxpayer and Consumer Rights, 2008 amendment changing name to Consumer Watchdog,
10 and 2016 amendment to Article III regarding Consumer Watchdog’s public purpose
11 attached as **Exhibit A**.) These Articles show that Consumer Watchdog was organized for
12 the primary purposes of conducting educational, litigation, and research activities on
13 consumer and public interest issues, and to represent the interests of ratepayers and
14 insurance policyholders before administrative agencies and the courts.

15 B. **10 CCR § 2662.2(a)(2)(B):** Consumer Watchdog has no members within the meaning of
16 section 5056 of the California Nonprofit Corporation Law. (See Consumer Watchdog’s
17 Bylaws (attached as **Exhibit B**), Article II.) The regulation does not require a consumer
18 group to have members in order to be eligible to seek compensation, but only to state “if
19 the group has members, the approximate number of current members.” (10 CCR
20 § 2662.2(a)(2)(B), emphasis added.) As documented in this Request, and as explicitly
21 stated in the organization’s Articles of Incorporation, Consumer Watchdog’s purpose is “to
22 conduct educational and research activities on consumer and public interest issues,”
23 (Exhibit A) while the By-Laws explicitly acknowledge the organization has no members
24 “within the meaning of section 5056 of the California Nonprofit Corporation Law.”
25 (Exhibit B.) Simply, having “members” is not a requirement of the intervenor regulations
26 or for being a non-profit consumer group under California law. (Corp. Code § 5000 et seq.)
27 The absence of formal members is expressly contemplated by the regulation’s conditional
28 phrasing and is consistent with California nonprofit law generally. (Corp. Code § 5000 et

1 seq.) Regardless, Consumer Watchdog has been granted nonprofit status by the IRS under
2 Internal Revenue Code section 501(c)(3). Consumer Watchdog maintains direct and robust
3 engagement with consumers it represents, routinely communicating directly to consumers
4 in various ways, including by responding to consumer complaints received via phone and
5 over its website, answering consumer questions about insurance premiums and the
6 availability of insurance, speaking at webinars and in-person panels on insurance and other
7 consumer issues, attending community meetings, organizing public events, and meeting in
8 person with fire survivors, patients, insurance policyholders, and other consumers.
9 Additionally, Consumer Watchdog's email subscriber list and social media pages have
10 more than 165,000 individual and organizational followers.

11 **C. 10 CCR § 2662.2(a)(2)(C):** Consumer Watchdog's current Board of Directors:

- 12 1. Jamie Court, Chair. Consumer Watchdog's President and Chair of the Board is an
13 award-winning and nationally recognized consumer advocate. Jamie has led dozens
14 of major corporate and political campaigns to reform insurers, banks, technology
15 companies, oil companies, utilities, and political practices. He helped to pioneer the
16 HMO patients' rights movement in the United States, sponsoring successful laws in
17 California and aiding them elsewhere, and was an early champion of many of the
18 most important consumer protections in the federal Affordable Care Act years before
19 they were enacted. He authored the health insurance rate regulation reform
20 Proposition 45 on the November 2014 California ballot. A frequent media
21 commentator and op-ed contributor, Jamie is a high-profile and stalwart defender of
22 consumers' rights. The *Los Angeles Times* calls him "a tireless consumer advocate."
23 His public interest career began as an advocate for the homeless and as a community
24 organizer.
- 25 2. Ellen Snortland, Secretary/Treasurer. Ellen is a playwright and documentary
26 filmmaker, a writing coach who works with both individuals and groups, an author,
27 columnist, empowerment self-defense advocate, actor, lawyer, radio and TV
28 personality, and more. A regular columnist for the *Pasadena Weekly*, *Downtown LA*

1 *News and Argonaut*, Ellen was recognized as the LA Press Club’s Journalist and
2 Columnist of the Year in 2024 and 2025.

- 3 3. Scott Olsen, Director. Scott has traveled the state and the nation advocating for
4 increased patient protections and fighting efforts to limit the rights of people and
5 families harmed by medical malpractice like his son, who was permanently disabled
6 following a failed medical diagnosis. Scott’s late wife, Kathy Olsen, was a
7 Consumer Watchdog Director until 2015. Scott stepped in to carry on her legacy and
8 the fight for patient rights.
- 9 4. RoseAnn DeMoro, Director. Retiring after 32 years with the California Nurses
10 Association, RoseAnn DeMoro was executive director of National Nurses United, as
11 well as the California Nurses Association/National Nurses Organizing Committee—
12 the largest professional and labor organization of registered nurses in the U.S. She is
13 one of the nation’s preeminent advocates for genuine healthcare reform and working
14 people.
- 15 5. Tammy Smick, Director. Tammy and her husband Tim were thrust into the fight for
16 patient safety after the tragic and needless death of their 20-year-old son, Alex, due
17 to a doctor’s negligence and reckless opioid overprescribing. She has traveled the
18 state of California fighting for patient safety and physician accountability.

19 Any correspondence to Board members may be sent to:

20 Consumer Watchdog
21 6330 San Vicente Blvd., Ste. 250
22 Los Angeles, CA 90048

- 23 D. **10 CCR § 2662.2(a)(2)(D)**: Consumer Watchdog updates interested parties via its website
24 (<http://www.consumerwatchdog.org>), email, and social media—including Facebook,
25 Instagram, and YouTube—and has an annual “Rage for Justice” awards dinner attended by
26 hundreds of its supporters. (See [http://www.consumerwatchdog.org/rage-for-justice-](http://www.consumerwatchdog.org/rage-for-justice-awards)
27 awards.)

1 E. **10 CCR § 2662.2(a)(2)(E)**: Attached as **Exhibit C** is a summary of highlights of Consumer
2 Watchdog's work and victories representing consumers in administrative, legislative, and
3 judicial proceedings since the last finding of eligibility in July 2024.

4 F. **10 CCR § 2662.2(a)(2)(F)**: Consumer Watchdog has been granted nonprofit status by the
5 IRS under Internal Revenue Code § 501(c)(3). The letter from the IRS indicating as such is
6 attached as **Exhibit D**.

7 G. **10 CCR § 2662.2(a)(2)(G)**: Consumer Watchdog's funding sources, listed by category and
8 percentage of its budget for the past 24 months, along with a listing of grants received, are
9 attached as **Exhibit E**. Note: no individual contributed at least 5% of Consumer
10 Watchdog's annual budget.¹⁴

11 WHEREFORE, having met the standards and provided the documentation required under 10
12 CCR § 2662.2, Consumer Watchdog requests that the Commissioner issue an updated finding of
13 eligibility to seek compensation effective for a two-year period in proceedings commenced on or after
14 July 12, 2026.

15 DATED: May 5, 2026

Respectfully submitted,

16 Harvey Rosenfield
17 Pamela Pressley
18 William Pletcher
19 CONSUMER WATCHDOG

20 By: *Pamela Pressley*
21 Pamela Pressley
22 Attorneys for CONSUMER WATCHDOG
23

24 ¹⁴ Consumer Watchdog does not waive any of its previous objections that its donor information is
25 confidential and protected from disclosure. Disclosure of donor information is not necessary to
26 determine eligibility to seek compensation, and Consumer Watchdog is obligated to keep the identity
27 of its donors confidential pursuant to the First Amendment right of freedom of association of its
28 donors. (See discussion of legal issues regarding disclosure of donor information in Consumer
Watchdog's Response to Public Advisor's Request for Additional Information in Support of its
Request for Finding of Eligibility to Seek Compensation, June 18, 2010 (on file with the Public
Advisor's office).)

I, Pamela Pressley, verify:

2. I personally prepared the attached pleading entitled, “Consumer Watchdog’s Request for a Finding of Eligibility to Seek Compensation.” All of the factual matters alleged therein are true of my own personal knowledge, or I believe them to be true after conducting some inquiry and investigation.

A. 1985 Articles of Incorporation, 1998 amendment changing name to Foundation for Taxpayer and Consumer Rights, 2008 amendment changing name to Consumer Watchdog, and 2016 amendment to Article III regarding Consumer Watchdog's public purpose.

C. A selection of Consumer Watchdog's recent activities and victories since July 2024.

E. Consumer Watchdog's funders by category and percentage of its budget for the past 24 months.

Executed May 5, 2026, at Los Angeles, California.

CONSUMER WATCHDOG'S REQUEST FOR FINDING OF ELIGIBILITY

EXHIBIT A

CERTIFICATE OF AMENDMENT
OF THE
ARTICLES OF INCORPORATION
OF
CONSUMER WATCHDOG

Jamie Court and Ellen Snortland certify that:

1. They are the President and the Secretary, respectively, of Consumer Watchdog, a California nonprofit public benefit corporation.
2. Article III of the Articles of Incorporation of this corporation is hereby amended to read in its entirety as follows:

The public purposes for which this corporation is formed are:

- A. Primarily, to conduct educational, litigation and research activities on consumer and public interest issues including, but not limited to, issues affecting consumer protection and environmental and government reform; to make said research available to the public; and to represent the interests of residential ratepayers and insurance policyholders before administrative agencies and courts.
- B. Generally, to exercise all rights and powers conferred on nonprofit corporations under the laws of California; provided, however, that this corporation shall engage only in those activities and exercise only those powers that are in furtherance of (i) its primary purpose, and (ii) educational and charitable purposes within the meaning of Section 501(c)3 and Section 170 (c)(2) of the Internal Revenue Code of 1954, as amended.

3. The foregoing amendment and restatement has been duly approved by this corporation's Board of Directors.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of our own knowledge.

DATED: 6/29/16


Jamie Court, President

DATED: 6-27-16


Ellen Snortland, Secretary

ENDORSED - FILED
In the office of the Secretary of State
of the State of California

JAN 18 2008

CERTIFICATE OF AMENDMENT
OF THE
ARTICLES OF INCORPORATION
OF
THE FOUNDATION FOR TAXPAYER AND CONSUMER RIGHTS

Jamie Court and Kathy Olsen certify that:

1. They are the President and the Secretary, respectively, of The Foundation for Taxpayer and Consumer Rights, a California nonprofit public benefit corporation.

2. Article I of the Articles of Incorporation of this corporation is hereby amended to read in its entirety as follows:

The name of this corporation is Consumer Watchdog.

3. The foregoing amendment has been duly approved by this corporation's Board of Directors.

4. This corporation has no members.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true of our own knowledge.

DATED: Jan 16, 2008

Jamie Court
Jamie Court, President

DATED: Jan 15, 2008

Kathy Olsen
Kathy Olsen, Secretary



0510644

JUN 30 1998

CERTIFICATE OF AMENDMENT
OF THE
ARTICLES OF INCORPORATION
OF
THE NETWORK PROJECT

Harvey Rosenfield and Ellen Snortland certify that:

1. They are the President and the Secretary, respectively, of The Network Project, a California nonprofit public benefit corporation.

2. Article I of the Articles of Incorporation of this corporation is hereby amended to read as follows:

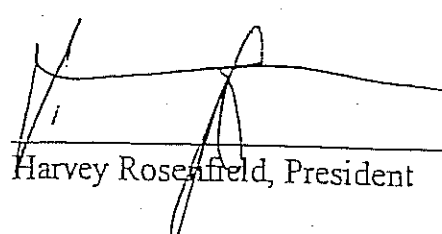
The name of this corporation is The Foundation for Taxpayer and Consumer Rights.

3. The foregoing amendment has been duly approved by this corporation's Board of Directors.

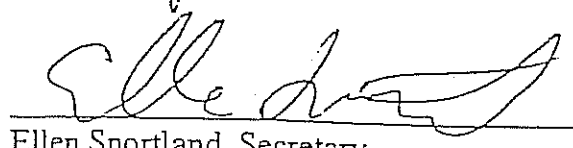
4. This corporation has no members.

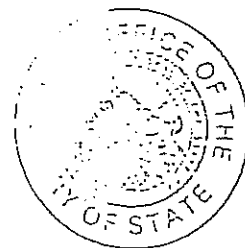
We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true of our own knowledge.

DATED: June 25, 1998


Harvey Rosenfield, President

DATED: June 22, 1998


Ellen Snortland, Secretary



ARTICLES OF INCORPORATION
OF
THE NETWORK PROJECT

1349849

ENDORSED
FILED
In the office of the Secretary of State
of the State of California

AUG 30 1985

MARCH 1986
Sharon K. Hawkins
Deputy
Secretary of State

ARTICLE I

The name of this corporation is:

THE NETWORK PROJECT

ARTICLE II

This corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for public purposes.

ARTICLE III

The public purposes for which this corporation is formed are:

A. Primarily, to conduct educational and research activities on consumer and public interest issues including, without limitation, issues affecting consumer protection and environmental and government reform; and to make said research available to the public; and

B. Generally, to exercise all rights and powers conferred on nonprofit corporations under the laws of California; provided, however, that this corporation shall engage only in those activities and exercise only those

powers that are in furtherance of (i) its primary purpose, and (ii) educational and charitable purposes within the meaning of Section 501(c)(3) and Section 170(c)(2) of the Internal Revenue Code of 1954, as amended.

ARTICLE IV

No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and this corporation shall not participate in, or intervene in (including the publishing or distribution of statements), any political campaign on behalf of or in opposition to any candidate for public office.

ARTICLE V

A. The property of this corporation is irrevocably dedicated to the purposes stated in Article III hereof, and no part of the net income or assets of this corporation shall ever inure to the benefit of any director, trustee, officer or member thereof or to the benefit of any private person.

B. Upon the dissolution or winding-up of this corporation, its assets remaining after payment of, or provision for payment of, all debts and liabilities of this corporation, shall be distributed to a nonprofit fund, foundation or corporation which is organized and operated exclusively for religious, charitable, scientific, literary

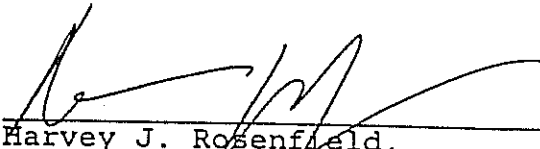
or educational purposes and has established and then holds tax-exempt status under Section 501(c)(3) of the Internal Revenue Code of 1954, as amended.

ARTICLE VI

The name and address in the State of California of this corporation's initial agent for service of process is:

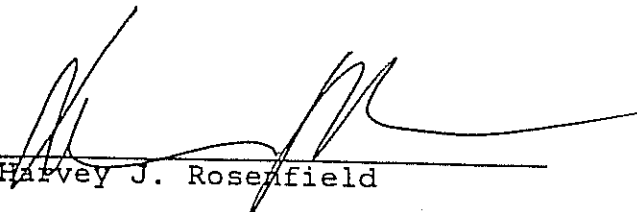
Harvey Jay Rosenfield
2019 Pontius Avenue
Los Angeles, California 90025

IN WITNESS WHEREOF, the undersigned, being the sole incorporator, has executed these Articles of Incorporation on August 8, 1985.



Harvey J. Rosenfield,
Incorporator

The undersigned declares that he is the person who has executed these Articles of Incorporation and hereby declares that this instrument is the act and deed of the undersigned.



Harvey J. Rosenfield

DGG485Y

EXHIBIT B

BYLAWS
OF
THE FOUNDATION FOR TAXPAYER AND CONSUMER RIGHTS
A California Nonprofit Public Benefit Corporation

ARTICLE I
NAME AND OFFICES

Section 1. Name. The name of this corporation is and shall be THE FOUNDATION FOR TAXPAYER AND CONSUMER RIGHTS (hereinafter, the "Corporation").

Section 2. Principal Office. The Corporation's principal office shall be fixed and located at such place as the Board of Directors (hereinafter, the "Board") shall determine. The Board is hereby granted full power and authority to change such principal office from one location to another.

Section 3. Other Offices. The Board may at any time establish branch or subordinate offices as deemed necessary for the transaction of the business of the Corporation.

ARTICLE II
MEMBERSHIP

Section 1. Members. The Corporation shall have no members within the meaning of section 5056 of the California Nonprofit Corporation Law. Any action which would otherwise require approval by a majority of all members or approval by the members shall require only approval of the Board. All rights which would otherwise vest in the members shall vest in the Directors.

Section 2. Honorary Members. Nothing in this Article II shall be construed as limiting the right of the Corporation's Board to elect honorary members of the Corporation, under such terms and conditions as the Board may see fit to provide, even though such a person shall not be deemed to be a "member" within the meaning of Section 5056 of the California Nonprofit Corporation Law and shall not have the rights of members set forth therein.

ARTICLE III
BOARD OF DIRECTORS

Section 1. General Powers. Subject to any limitations contained in the California Nonprofit Corporation Law, the activities and affairs of the Corporation shall be conducted and all corporate powers shall be exercised by or under the direction of the Board. The Board may delegate the management of the activities of the Corporation to any person or persons, management company, or committee however composed, provided that the activities and affairs of the Corporation shall be managed and all corporate powers shall be exercised under the ultimate direction of the Board.

Section 2 Number of Directors. The authorized number of Directors of the Corporation shall be not less than three (3) nor more than ten (10), with the exact number of authorized trustees to be fixed from time to time by resolution of the Board of Trustees.¹

Section 3. Election and Term of Office. All Directors shall be elected annually at the regular annual meeting of the Board, to hold office until expiration of the term for which elected and until a successor has been elected and qualified.

The term of office of each Director shall be three years.

Section 4. Resignation. Any Director may resign effective upon giving written notice to the Chairman of the Board, or to the Board, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected before such time to take office when the resignation becomes effective. No Director may resign where the Corporation would then be left without a duly elected Director or Directors in charge of its affairs, except upon notice to the Attorney General.

Section 5. Removal and Disqualification. (a) Any Director may be removed without cause, at any time, upon approval of a majority of the Directors then in office. Any Director may be removed for cause under the provisions of Section 5223 of the California Nonprofit Corporation Law.

(b) The Board may declare vacant the office of any Director who fails to attend three regular meetings of the Board.

Section 6. Vacancies. (a) A vacancy in the Board shall be deemed to exist (i) upon the death, resignation or removal of any Director; or (ii) upon an increase in the authorized number of Directors; or (iii) upon the declaration by Board resolution of a vacancy in the office of a Director who has been declared of unsound mind by a final order of court, or convicted of a felony, or found by a final order or judgment of any court to have breached any duty under Article 3 of Chapter 2 of the California Nonprofit Public Benefit Corporation Law.

No reduction of the authorized number of Directors shall have the effect of removing any Director prior to the expiration of such Director's term of office.

(b) All vacancies shall be filled by a majority of the remaining Directors then in office, whether or not less than a quorum, or by a sole remaining Director. Each Director so elected shall hold office until the expiration of the term of the replaced Director and until a successor has been elected and qualified.

Section 7. Restriction on Interested Directors. Not more than forty-nine percent (49%) of the persons serving on the Board may be interested persons. For such purpose, interested person means either (1) any person currently being compensated by the Corporation for services rendered to it within the previous twelve months, whether as a full-or part-time employee, independent contractor, or otherwise, excluding any reasonable compensation paid to a Director as Director; or

¹ Amended by Board 5/99.

(2) any brother, sister, ancestor, descendant, spouse, brother-in-law, sister-in-law, son-in-law, daughter-in-law, mother-in-law, or father-in-law of any such person. However, any violation of the provisions of this Section shall not affect the validity or enforceability of any transaction entered into by the Corporation.

Section 8. Annual Meeting. An annual meeting of the Board shall be held without other notice than these Bylaws on the third Tuesday of April of each year, at the principal office of the Corporation, or at such other time and place as the Board may fix, for the purpose of electing Directors and officers and for the transaction of such other business as may come before the Board.

Section 9. Other Regular Meetings. Other regular meetings of the Board may be held without call or notice on such dates and at such times and places as may be fixed from time to time by the Board.

Section 10. Special Meetings. (a) Special meetings of the Board for any purpose or purposes may be called by or at the request of President, the Chairman of the Board, if any, or any two (2) Directors. Unless an alternate location is approved by the person(s) calling the special meeting, the place of said meeting shall be the principal office of the Corporation.

(b) Special meetings of the Board shall be held upon four days' notice by first-class mail or forty-eight hours' notice given personally or by telephone, telegraph, telex, or similar means of communication. Such notice shall state the time and place of the meeting (unless the place of the meeting is the principal office of the Corporation) but need not specify the purpose.

Any such notice shall be addressed or delivered to each Director at such Director's address as shown upon the records of the Corporation by the President for purposes of notice or, if such address is not shown on such records or is not readily ascertainable, at the place at which the meetings of the Directors are regularly held.

Notice by mail shall be deemed to have been given at the time a written notice is deposited in the United States mails, postage prepaid. Any other written notice shall be deemed to have been given at the time it is personally delivered to the recipient or is delivered to a common carrier for transmission, or actually transmitted by the person giving the notice by electronic means, to the recipient. Oral notice shall be deemed to have been given at the time it is communicated, in person or by telephone or wireless, to the recipient or to a person at the office of the recipient who the person giving the notice has reason to believe will promptly communicate it to the recipient.

Section 11. Quorum. One-fifth of the number of Directors authorized in the Articles or Bylaws, but in no event less than two (2), whichever is larger, shall constitute a quorum of the Board for the transaction of business, except to adjourn as provided in Section 14 of this Article III. Every act or decision made or done by a majority of the Directors present at a meeting duly held at which a quorum is present shall be regarded as the act of the Board, unless a greater number is required by law or by the Articles or these Bylaws. A meeting at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action taken is approved by at least a majority of the required quorum for such meeting or such greater number as is required by law or by the Articles or these Bylaws.

Section 12. Participation in Meetings by Conference Telephone. Members of the Board may participate in a meeting through use of conference telephone or similar communications equipment, so long as all members participating in such meeting can hear one another. Participation in a meeting pursuant to this Section constitutes presence in person at such meeting.

Section 13. Waiver of Notice. Notice of a meeting need not be given to any Director who signs a waiver of notice or a written consent to holding the meeting or an approval of the minutes thereof, whether before or after the meeting, or who attends the meeting without protesting, prior thereto or at its commencement, the lack of notice to such Director. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meetings.

Section 14. Adjournment. A majority of the Directors present, whether or not a quorum is present, may adjourn any meeting to another time and place. Notice of the time and place of holding an adjourned meeting need not be given unless the original meeting is adjourned for more than twenty-four hours. If the meeting is adjourned for more than twenty-four hours, notice of any adjournment to another time or place shall be given prior to the time of the adjourned meeting to the Directors who were not present at the time of the adjournment.

Section 15 Action Without a Meeting. Any action required or permitted to be taken by the Board may be taken without a meeting, if all members of the Board shall individually or collectively consent in writing to such action. Such written consent or consents shall be filed with the minutes of the proceedings of the Board. Such action by written consent shall have the same force and effect as the unanimous vote of such Directors.

Section 16 Compensation. Directors shall not receive compensation for their services as members of the Board, but shall be reimbursed for their just and reasonable expenses, as may be fixed or determined by resolution of the Board. Subject to the provisions of Section 7 of this Article III, a Director may serve the Corporation in any other capacity as an officer, agent, employee or otherwise, and receive compensation therefor and reimbursement for expenses, in such amounts as may be fixed or determined by resolution of the Board.

Section 17. Committees. (a) The Board may, by resolution adopted by a majority of the number of Directors then in office, provided consisting of two or more Directors and no persons who are not Directors, to serve at the pleasure of the Board. Appointments to such committees shall be by a majority vote of the Directors then in office. The Board may appoint one or more Directors as alternate members of any committee, who may replace any absent member at any meeting of the committee. Any such committee, to the extent provided in the resolution of the Board or in these Bylaws, shall have all the authority of the Board, except that no committee may:

- (1) fill vacancies on the Board or on any committee which has the authority of the Board;
- (2) fix compensation of the Directors for serving on the Board or on any committee;
- (3) amend or repeal Bylaws or adopt new Bylaws;

- (4) amend or repeal any resolution of the Board which by its express terms is not so amendable or repealable;
- (5) create any committees of the Board or appoint the members thereof;
- (6) expend corporate funds to support a nominee for Director after there are more people nominated for Director than can be elected; or,
- (7) approve any self-dealing transaction, as such transactions are defined in section 5233 (a) of the California Nonprofit Corporation Law, except as otherwise provided in section 5233(d)(3) thereof.

The Board shall have the power to prescribe the manner in which proceedings of any such committee shall be conducted. In the absence of any such prescription, such committee shall have the power to prescribe the manner in which its proceedings shall be conducted. Unless the Board of such committee shall otherwise provide, the regular and special meetings and other actions of any such committee shall be governed by the provisions of this Article III appropriate to meeting and actions of the Board. Minutes shall be kept of each meeting of each committee.

(b) The Board may, by resolution adopted by a majority of the number of Directors then in office, provided that a quorum is present, create one or more advisory committees whose members may, but need not, be Directors of the Corporation, to serve at the pleasure of the Board. Appointments to such committees shall be by a majority vote of the Directors then in office. Such committees shall have such powers and functions as are delegated by the Board.

ARTICLE IV

OFFICERS

Section 1. Officers. The officers of the Corporation shall be a President, Executive Director, and a Secretary/Treasurer. The Corporation may also have, at the discretion of the Board, a Chairman of the Board, one or more Vice Presidents, one or more Assistant Secretary/ Treasurers, and such other officers as may be elected or appointed in accordance with the provisions of Section 3 of this Article IV. Any number of offices may be held by the same person, except that the Secretary/Treasurer may not serve concurrently as the President or Chairman of the Board.

Section 2. Election and Term of Office. The officers of the Corporation shall be elected by the Board of Directors at the regular annual meeting of the Board and shall serve at the pleasure of the Board, subject to the rights, if any, of an officer under any contract of employment. If the election of any officer shall not be held at such meeting, such shall be held as soon thereafter as conveniently possible. Each officer shall hold office until his or her resignation, removal, or other disqualification from service, or until his or her successor shall have been elected.

Section 3. Subordinate Officers. The President may appoint such other officers as the business of the Corporation may require, each of whom shall hold office for such period, have such authority, and perform such duties as are provided in these Bylaws or as the Board may from time to time determine.

Section 4. Removal. Any officer may be removed by the Board, with or without cause, at any time, whenever in the Board's judgment the best interests of the Corporation would be served thereby.

Section 5. Resignation. Any officer may resign at any time by giving written notice to the Corporation, without prejudice to the rights, if any, of the Corporation under any contract to which the officer is a party. Any resignation shall take effect at the date of receipt of such notice or at any later time specified therein and, unless otherwise specified in such notice, the acceptance of such resignation shall not be necessary to make it effective.

Section 6. Vacancies. A vacancy in any office because of death, resignation, removal, disqualification or otherwise shall be filled in the manner prescribed in these Bylaws for regular election to such office, provided that a vacancy shall be filled as it occurs and not on an annual basis.

Section 7. Duties of the President. Subject to such powers as may be given by the Board to the Chairman of the Board, if any, the President shall serve as the Corporation's president, general manager and chief executive officer and shall have, subject to control of the Board, general supervision, direction, and control of the business and officers of the Corporation. In the absence of the Chairman of the Board or if there be none, the President shall preside at all meetings of the Board and of the Corporation, and shall perform all duties of management usually vested in the office of president and general manager of a corporation and shall have such other powers and perform such other duties as from time to time may be prescribed by the Board, the law or these Bylaws.

Section 8. Duties of the Executive Director. The Executive Director shall act as the chief administrative officer of the Corporation. The Executive Director shall report directly to the President of the Corporation.

In the absence or in the event of the disability of the President, the Executive Director shall perform all the duties of the President and, when so acting, shall have all the powers of, and be subject to all the restrictions upon, the President. The Executive Director shall have such other powers and perform such other duties as from time to time may be prescribed by the Board.

Section 9. (a) Duties of the Secretary/Treasurer. The Secretary/Treasurer shall keep or cause to be kept, at the principal office of the Corporation or at such other place as the Board may order, the minutes of all meetings of the Board and its committees. The minutes shall include the time and place that the meeting was held, whether regular or special, and if special, how authorized, the notice given, the names of those present, and the proceedings thereof. The Secretary/Treasurer shall keep, or cause to be kept, at the principal office of the Corporation in the State of California, the original or a copy of the Corporation's Articles and Bylaws, as amended to date. The Secretary/Treasurer shall give, or cause to be given, notice of all meetings of the Board and any committees thereof required by these Bylaws or by the law to be given, shall keep the seal of the Corporation in safe custody, and shall have such other powers and perform such other duties as from time to time may be prescribed by the Board.

(b) The Secretary/Treasurer shall also be the chief financial officer of the Corporation and shall keep and maintain, or cause to be kept and maintained, adequate and correct books and records of account of the properties and business transactions of

the Corporation. The Secretary/Treasurer shall send or cause to be given to the Directors such financial statements and reports as are required to be given by law, these Bylaws, or the Board. The Secretary/Treasurer shall deposit all monies and other valuables in the name and to the credit of the Corporation with such depositories as may be designated by the Board. The Secretary/Treasurer shall disburse the funds of the Corporation as may be ordered by the Board, shall render to the President and the Directors, whenever they request, an account of all transactions as Secretary/Treasurer and of the financial condition of the Corporation, and shall have such other powers and perform such other duties as from time to time may be prescribed by the Board, the law or these Bylaws. The Secretary/Treasurer shall annually cause the Corporation's books and accounts to be audited by an independent accountant selected by the Board and shall promptly present to the Board said accountant's report.

Section 10. Fees and Compensation. Officers may receive such compensation for their services and such reimbursement for expenses as may be fixed or determined by resolution of the President, except that the Board shall approve the compensation of those officers who also serve as members of the Board.

ARTICLE V

BOOKS AND RECORDS

Section 1. Maintenance of Corporate Records. The Corporation shall keep: (1) adequate and correct books and records of account; and (2) minutes in written form of the proceedings of the Board and committees of the Board.

All such records shall be kept at the Corporation's principal office.

Section 2. Maintenance and Inspection of Articles and Bylaws. The Corporation shall keep at its principal office in California the original or a copy of its Articles of Incorporation and Bylaws as amended to date.

Section 3. Inspection by Directors. Every Director shall have the absolute right at any reasonable time to inspect and copy all books, records and documents of every kind and to inspect the physical properties of the Corporation.

Section 4. Annual Report to Directors. The Board shall cause an annual report and a statement of transactions with interested persons and of indemnifications to be furnished annually to all Directors of the Corporation, containing the information required by Sections 6321 and 6322 of the California Nonprofit Corporation law.

ARTICLE VI

INDEMNIFICATION OF DIRECTORS, OFFICERS, EMPLOYEES, AND OTHER AGENTS

Section 1. (a) The Corporation shall have the power to indemnify its "agents", as defined in Section 5238 of the California Nonprofit Corporation Law, to the maximum extent permitted by law.

(b) The Corporation shall have the power to purchase and maintain insurance on behalf of any "agent" of the Corporation against any liability asserted against or

incurred by the agent in such capacity or arising out of the agent's status as such whether or not the Corporation would have the power to indemnify the agent against such liability under the provisions of this Article; provided, however, that the Corporation shall not purchase or maintain such insurance to indemnify any agents of the Corporation for a violation of Section 5233 of the California Nonprofit Corporation Law.

ARTICLE VII

OTHER PROVISIONS

Section 1. Contracts. The Board may authorize any officer or officers, agent or agents, of the Corporation to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances. Unless so authorized by the Board, no officer, agent, or employee shall have any power or authority to bind the Corporation by any contract or engagement or to pledge its credit or to render it liable for any purpose or to any amount.

Section 2. Checks, Drafts, Etc. All checks, drafts, or orders for payment of money, notes or other evidences of indebtedness issued in the name of or payable to the Corporation, shall be signed or endorsed by such officer or officers, agent or agents, of the Corporation and in such manner as from time to time shall be determined by resolution of the Board. In the absence of such determination by the Board, such instruments shall be signed or endorsed by the Secretary/Treasurer.

Section 3. Gifts. The Board may accept on behalf of the Corporation any contribution, gift, bequest or devise for the general purpose or for any special purpose of the Corporation.

Section 4. Parliamentary Authority. The rules contained in the current edition of Robert's Rules of Order Newly Revised shall govern the Corporation in all cases in which they are applicable and in which they are not inconsistent with these Bylaws, the Articles of the Incorporation or then existing law.

Section 5. Construction and Definitions. Unless the context otherwise requires, the general provisions, rules of construction, and definitions contained in the California Nonprofit Corporation Law shall govern the construction of these Bylaws. Without limiting the generality of the foregoing, the masculine gender includes the feminine and neuter, the singular includes the plural, the plural includes the singular, and the term "person" includes both a legal entity and a natural person.

ARTICLE VIII
AMENDMENTS

New Bylaws may be adopted, or these Bylaws may be amended or repealed, by the Board, subject to the following limitations:

(1) No amendment may extend the term of a Director beyond that for which such Director was elected.

(2) Where any provision in these Bylaws requires the vote of a larger proportion of, or all of, the Directors, than is otherwise required by law, such provision may not be altered, amended or repealed except by such greater vote.

CERTIFICATE OF SECRETARY/TREASURER

I, the undersigned, do hereby certify:

(1) That I am the duly elected and acting Secretary/Treasurer of THE FOUNDATION FOR TAXPAYER AND CONSUMER RIGHTS, a California Nonprofit Public Benefit Corporation; and,

(2) That the foregoing Bylaws constitute the Bylaws of said Corporation as duly adopted by action of the Board of Directors of said Corporation duly taken.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the seal of said Corporation as of the 21st day of December, 2001.


Secretary/Treasurer

EXHIBIT C

Consumer Watchdog Recent Highlights

June 2024 – April 2026

- Saved policyholders over \$1.15 billion by intervening to challenge excessive rate hikes under Prop 103, including in:
 - *In the Matters of the Rate Applications of State Farm Gen. Ins. Co.*, PA-2025-00011, PA-2025-00012, and PA-2025-00013 (executed settlement filed with Admin. Hearing Bureau), resulting in an annual savings of \$530 million in homeowners, rental dwelling, and renters and condo insurance premiums;
 - *In the Matter of the Rate Application of Stillwater Insurance Company*, PA-2025-00003 (Cal. Ins. Comm'r 2025), resulting in annual savings of \$13.2 million in homeowners, renters, and condo insurance premiums;
 - *In the Matters of the Rate Applications of United Servs. Auto. Assn., Garrison Property and Cas. Ins. Co., and USAA Cas. Ins. Co.*, PA-2024-00007, PA-2024-00008, and PA-2024-00009 (Cal. Ins. Comm'r 2025), resulting in annual savings of \$114 million in auto insurance premiums;
 - *In the Matter of the Rate Application of General Ins. Co. of Am.*, PA-2024-00014 (Cal. Ins. Comm'r 2025), resulting in annual savings of \$30 million in homeowners insurance premiums;
 - *In the Matter of the Rate Application of United Fin. Cas. Co.*, PA-2024-00003 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$47.5 million in auto insurance premiums;
 - *In the Matter of the Rate and Rule Application of State Farm Mut. Auto. Ins. Co.*, PA-2024-00010 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$326 million in auto insurance premiums;
 - *In the Matter of the Rate Application of United Servs. Auto. Assn.*, PA-2023-00023 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$10.4 million in homeowners insurance premiums;
 - *In the Matter of the Rate Application of Liberty Ins. Corp.*, PA-2023-00016 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$31.1 million in homeowners insurance premiums;
 - *In the Matter of the Rate Applications of 21st Century Ins. Co. and 21st Century Cas. Co.*, PA-2024-00006 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$11.4 million in auto insurance premiums; and
 - *In the Matter of the Rate, Rule, and Form Application of Liberty Mut. Fire Ins. Co.*, PA-2024-00004 (Cal. Ins. Comm'r 2024), resulting in annual savings of \$38.4 million in auto insurance premiums.
- Participated in the pre-application required information determination (“PRID”) procedure of two companies seeking to implement use of their wildfire model in the ratemaking proceedings of insurance companies within the state as the only consumer

representative to do so in *In the Matter of the PRID Procedure of AIR Worldwide Corporation d/b/a Verisk Extreme Event Solutions*, PRID-2025-00001 (Cal. Ins. Comm'r 2025) and *In the Matter of the PRID Procedure of Moody's*, PRID-2025-00002 (Cal. Ins. Comm'r 2024).

- Represented the public's interest in Department of Insurance rulemaking proceedings, submitting extensive written and oral comments and legal analysis, regarding the proposed "Intervenor and AHB Fairness and Accountability" regulations, REG-2025-00006, and submitting oral and written comments on the final proposed and amended regulations regarding the "Catastrophe Modeling and Ratemaking" regulations, REG-2023-00010.
- Represented the public's interest through the conclusion and settlement of a seven-year matter regarding the rating practices of Allstate in *In the Matter of the Rating Practices of Allstate Ins. Co. and Allstate Indemnity Co.*, NC-2018-00001 (Cal. Ins. Comm'r 2025).
- Filed amicus briefs at every level of federal court — the Northern District of California, the Ninth Circuit, the D.C. Circuit, and the United States Supreme Court — challenging the constitutional validity of sweeping federal tariffs imposed without congressional authorization. Consumer Watchdog's briefs argued that the executive branch's unilateral assertion of unlimited tariff-setting power under IEEPA violated the non-delegation doctrine and the separation of powers: the power to tax — and tariffs are taxes — is vested in Congress, not the President. The Supreme Court agreed, striking down the emergency tariffs in a ruling that adopted the core arguments of Consumer Watchdog's brief. Consumer Watchdog has since filed a further amicus brief in the Supreme Court challenging unlawful tariff "modifications" that seek to accomplish through executive sleight-of-hand what the Court already held the executive cannot do directly. These unconstitutional tariffs functioned as a regressive tax on California families and small businesses — falling hardest on those least able to absorb higher prices on imported goods, auto parts, building materials, and consumer staples — making Consumer Watchdog's constitutional challenge an extension of its core mission to protect consumers from unlawful exactions, whether imposed by insurers or by government actors exceeding their lawful authority.
- Sued the five largest oil refiners operating in California in federal court for working together to inflate the reported compliance cost of the state's Low Carbon Fuel Standard ("LCFS") program, and to pass those inflated costs on to California consumers through increased gasoline prices in *Herold v. Chevron Corp.*, No. 25-cv-10282 (N.D. Cal. filed Nov. 26, 2025).
- Won passage of Consumer Watchdog-sponsored legislation that closes 800 active oil wells in the Inglewood Oil Field by 2030, and helped stop a ballot referendum challenging the new ban on community oil drilling.
- Organized volunteer patient advocates statewide who won new rules giving patients a voice in doctor disciplinary actions.
- Won passage of new law that creates minimum gasoline supply requirements for oil refiners to stop gasoline price gouging.

- Launched an investigative podcast, “Smoke and Mirrors: Investigating Home Insurance Abuses,” and released three reports spotlighting the major issues affecting fire survivors forced to fight insurance providers’ claim lowballing, delays, and denials.
- Co-sponsor of legislation currently moving through the legislature to require independent audits of utilities’ wildfire mitigation spending before additional funds are approved.
- Realized the first-ever hearing focused on maternal and infant mortality and the creation of a maternal mortality task force at the Medical Board of California.
- Built a public education campaign exposing how attacks by rideshare companies on legal protections that hold drivers, auto manufacturers, and rideshare companies accountable threaten public safety across the country.
- Fought to shine light on secretive models that determine home insurance pricing and denials, building the case for passage of a new law to create a public model for wildfire risk projections.
- Released multiple reports investigating the big data economy that enables companies to collect, sell and share our data impacting everything from the price we pay for a carton of milk to whether we get the job we apply for.
- Co-sponsor of three bills currently moving through the legislature to help consumers access the insurance benefits they paid for and preserve their existing home insurance coverage.

EXHIBIT D

Internal Revenue Service
P.O. Box 2508
Cincinnati, OH 45201

Department of the Treasury

Date: APR 25 2008

CONSUMER WATCHDOG
1750 OCEAN PARK BLVD - STE 200
SANTA MONICA CA 90405-4938

Person to Contact:

Vaida Singleton
ID# 31-03018

Toll Free Telephone Number:

877-829-5500

Employer Identification Number:

95-3993720

Dear Sir or Madam:

This is in response to the amendments to your organization's Articles of Incorporation filed with the state on January 18, 2008. We have updated our records to reflect the name change from THE FOUNDATION FOR TAXPAYER AND CONSUMER RIGHTS to **CONSUMER WATCHDOG**, as indicated above.

Our records indicate that a determination letter was issued in August 1988 that recognized you as exempt from Federal income tax. Our records further indicate that you are currently exempt under section 501(c)(3) of the Internal Revenue Code.

Our records also indicate you are not a private foundation within the meaning of section 509(a) of the Code because you are described in section 509(a)(1) and 170(b)(1)(A)(vi).

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,


Cindy Westcott
Manager, Exempt Organizations
Determinations

EXHIBIT E

Exhibit E

Consumer Watchdog Sources of Funding

June 1, 2024 – April 21, 2026

1. Grants	20.09%
2. Individual Contributions.....	52.28%
3. Attorney/Intervenor Fees.....	25.10%
4. Investment Income	2.53%

Foundation Grants

Sustainable Markets Foundation (2024) – \$62,500.00
Barbra Streisand Foundation, Inc. (2024) – \$25,000.00
Sustainable Markets Foundation (2024) – \$147,000.00
Sustainable Markets Foundation (2025) – \$50,500.00
Rose Foundation for Communities (2025) – \$150,000.00
There is a Light Foundation (2025) – \$100,000.00
11th Hour Project Schmidt Family Foundation (2025) – \$300,000.00
Price Philanthropies Foundation (2025) – \$10,000.00
Price Philanthropies Foundation (2025) – \$50,000.00
American Endowment Foundation (2025) – \$25,000.00
Barbra Streisand Foundation (2025) – \$25,000.00
Sustainable Markets Foundation (2025) – \$58,500.00
The Corwin D Denney Foundation (2025) – \$25,000.00
Mazess Fund (2025) – \$10,000.00
Sunrise Project (2025) – \$125,000.00
Christine Spagnoli Charitable Fund (2025) – \$25,000.00
Price Philanthropies Foundation (2026) – \$50,000.00
Sustainable Markets Foundation (2026) – \$59,500.00
There is a Light Foundation (2026) – \$50,000.00
Madison Community Foundation (2026) – \$10,000.00
Silicon Valley Community Foundation (2026) – \$300,000.00

Corporate, Business, and Government Grants

None

Service List

Margaret Hosel
Public Advisor
Office of the Public Advisor
California Department of Insurance
300 Capitol Mall, 17th Floor
Sacramento, CA 95814
Tel. (916) 492-3705
Fax: (510) 238-7830
Margaret.Hosel@insurance.ca.gov
Publicadvisor@insurance.ca.gov

- ☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL