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INSURANCE COMMISSIONER
OKLAHOMA

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984 AS TO WHETHER THE OKLAHOMA HOMEOWNERS INSURANCE MARKET IS NONCOMPETITIVE	))))	**CASE NO. 26-0820-TRN**

JOINT AFFIDAVIT OF THE OKLAHOMA ATTORNEY GENERAL AND BOB SULLIVAN IN SUPPORT OF DISQUALIFICATION OF THE INDEPENDENT HEARING EXAMINER AND OF THE INSURANCE COMMISSIONER PURSUANT TO 75 O.S. § 316

COME NOW the State of Oklahoma, *ex rel.* Gentner Drummond, Attorney General of the State of Oklahoma (the "Attorney General"), a party to this proceeding pursuant to 74 O.S. § 18b(22) and the Notice of Hearing filed herein on July 14, 2026, and Bob Sullivan, an interested party of record who entered his appearance on August 26, 2026 (together, "Movants"), and pursuant to 75 O.S. § 316 jointly submit this Affidavit seeking the disqualification of the Honorable John D. Miller, Independent Hearing Examiner (the "Hearing Examiner"), and the disqualification of the Insurance Commissioner (the "Commissioner") from any adjudicative, decisional, or supervisory role in this proceeding.

Movants each advocate the position that the Oklahoma homeowners insurance market is noncompetitive and, under 36 O.S. § 984(A), bear the burden of proof on that issue. This Affidavit is filed promptly upon discovery of the grounds stated below, which arose at the pre-hearing conference held September 4, 2026, and states those grounds with particularity as 75 O.S. § 316 requires. The transcript of that conference is attached as Exhibit H and is cited herein as "Tr." In support, Movants state as follows.

I. THE AFFIANTS AND THE PROCEEDING

STATE OF OKLAHOMA	)	
	) ss.	
COUNTY OF OKLAHOMA	)	

1. We, Reggie N. Whitten and Michael J. Hunter, each being of lawful age and first duly sworn upon oath, state that we are attorneys licensed to practice law in the State of Oklahoma, OBA Nos. 9576 and 4503 respectively; that Mr. Whitten is counsel of record for the Attorney General and Mr. Hunter is counsel of record for Bob Sullivan in this proceeding; that each of us personally appeared for his respective client at the pre-hearing conference held September 4, 2026; and that each of us is competent to testify to the matters set forth herein. The statements below are made upon our personal knowledge, except those expressly made upon information and belief, which we believe to be true. Where a statement is personal to one affiant, he is identified by name.

2. **The proceeding.** On July 14, 2026, the Commissioner issued a Notice of Hearing pursuant to 36 O.S. §§ 307 and 984 and OAC 365:1-7-1(a), setting this matter for hearing before an independent hearing examiner on September 14, 2026, "for the purpose of determining whether the homeowners insurance market in Oklahoma is noncompetitive." The Notice was served upon the Attorney General and upon more than one hundred property and casualty insurers, and invited "all interested parties with a direct, immediate, and substantial interest" to "participate in the public hearing and offer evidence and argument on the issues involved." Exhibit A.

3. By Order filed July 29, 2026, the Hearing Examiner set a pre-hearing conference and an August 26, 2026 deadline for entries of appearance. Seven participants appeared: the Department, the Attorney General, Bob Sullivan, Craig MacIntyre, NAMIC, APCIA, and the Oklahoma P&C Advocacy Association. No individual insurance company appeared.

4. The Attorney General filed his Omnibus Pre-Hearing Motion on August 25, 2026. Under the parties' Joint Motion for Clarification and Stipulation, responses were due at noon on September 1, 2026, and replies at noon on September 3, 2026. The pre-hearing conference at which that motion was to be heard convened September 4, 2026, at 9:05 a.m., by Microsoft Teams.

5. **The decisional structure.** Under 36 O.S. § 319, the Commissioner may appoint an independent hearing examiner "who shall sit as a quasi-judicial officer." Under 36 O.S. § 313(A), "[a] final order signed by an independent hearing examiner, after hearing, shall be final agency action, notwithstanding the provisions of Section 311 of Title 75 of the Oklahoma Statutes." The Hearing Examiner is therefore the sole and final adjudicator of this matter. There is no intra-agency review of what he decides, and no officer within the Department capable of curing a defect in his impartiality.

II. TIMELINESS

6. Section 316 requires that an affidavit of disqualification be filed "promptly upon discovery of the alleged disqualification." 75 O.S. § 316. The statute runs from discovery of the ground, not from the inception of the proceeding.

7. **The grounds are of two kinds, and each is timely.** The grounds stated in Part III, and the ground stated in Part IV.A, arose at or were first disclosed at the September 4, 2026 conference: the Hearing Examiner's appearance from within the Department's offices and in the company of the Department's staff; his statement of position on the hearing date, followed by a thirteen-minute recess taken beyond the observation of every remote participant and his reversal upon returning; and the Department's disclosure, made for the first time on the record that day, that it anticipates calling the Commissioner as a witness at the merits hearing. This Affidavit is filed within the shortest interval in which counsel could obtain the transcript of that conference and reduce those events to a verified writing. The facts recited in Parts IV.B and IV.D are of a different character, and Movants do not represent otherwise. The Commissioner's April 7, 2026 order, the Department's public statements, and the Commissioner's participation in the 2026 Insurance Commissioner election were each public when made. What was not known before September 4, 2026, and could not have been known, is that the Department would call the Commissioner as its own witness in the very proceeding convened to decide the question he had already answered. Section 316 runs from discovery of the alleged disqualification, not from the

date of each fact of which it is composed, and the disqualification alleged here is the configuration those facts assumed on September 4. Mr. Hunter states further that Mr. Sullivan entered his appearance in this proceeding on August 26, 2026, and that Mr. Sullivan was not a party who could request disqualification under Section 316 before that date.

8. **Prompt filing is consequential.** Movants are mindful of the consequences of delay. *See Leo v. Okla. Water Res. Bd.*, 2023 OK 96, ¶ 49, 536 P.3d 939, 954–55; *Robbins v. Okla. Alcoholic Beverage Control Bd.*, 1969 OK 202, 461 P.2d 610; *Gann v. State ex rel. Okla. Corp. Comm'n*, 2026 OK 24 (a disqualification issue not raised at the administrative proceeding may not be raised for the first time on appeal). They file now, before the continued hearing and before any evidence is received.

9. **The engagement is context, not a freestanding ground.** The Hearing Examiner's continuing engagement by the Department, described at paragraphs 25 and 26 below, is not offered as a ground newly discovered on September 4, 2026. It is offered as the structural setting in which the September 4 conduct occurred and against which that conduct must be assessed. The September 4 conduct is independently sufficient, and this Affidavit rests upon it.

III. GROUNDS FOR DISQUALIFICATION OF THE HEARING EXAMINER

10. **The Department's late filing.** At approximately 5:00 p.m. on September 3, 2026 — after the stipulated briefing on the Omnibus Pre-Hearing Motion had closed, and roughly sixteen hours before the conference convened to decide it — the Department filed a Motion to Dismiss Parties Due to Lack of Standing directed at two participants, both announced candidates for Insurance Commissioner. In that Motion the Department stated that it "does not wish for the scheduled pre-hearing conference to be delayed or continued further." Motion at 6.

11. **The conference.** We each appeared at the September 4, 2026 conference — Mr. Whitten for the Attorney General and Mr. Hunter for Mr. Sullivan. It was conducted by Microsoft Teams.

12. **The adjudicator appeared from within a party's space.** The Hearing Examiner appeared on video against a background denoting the Oklahoma Insurance Department. As his connection was being established, a woman could be heard speaking with him and assisting him in setting up his appearance, and she was briefly visible on screen with him. She is Sherry Standerfer, the Department's paralegal and the individual through whom the filings in this proceeding are routed. Ms. Standerfer thereafter conducted portions of the roll on the record. Tr. 5:11–19, 6:6–11. It was apparent that the Hearing Examiner was appearing from within the Department's space and in the physical company of Ms. Standerfer. The Department is a party to this proceeding.

13. **The Hearing Examiner stated he did not want to move the hearing date.** Early in the conference, and before any motion to continue had been made, the Hearing Examiner stated on the record that he was "not particularly wanting to move the date or time of the actual hearing itself, but I want to make sure it's conducted in a fair and impartial way." Tr. 14:3–8.

14. **The continuance was moved from the floor.** Brett Robinson, appearing for the Oklahoma P&C Advocacy Association, then moved orally for a continuance of the September 14, 2026 hearing. Tr. 14:9–20. No written motion had been filed and no notice of that request had been given.

15. **The Department reversed its written position.** The Department, which had represented in writing hours earlier that it did not wish the conference delayed, stated through counsel that it "has no objection to any motions for a continuance." Tr. 14:21–15:4.

16. **Three parties objected; only the movant asked for it.** Three participants objected. Mr. Whitten, on behalf of the Attorney General, stated that his client "would strenuously object to moving," that four out-of-state expert witnesses had set their schedules, and that "we're ready to go." Tr. 15:7–20. Mr. Hunter objected on Mr. Sullivan's behalf and stated that he would rather argue the pending motion that day. Tr. 16:18–24. J. Blake Patton, for NAMIC and APCIA, noted a "forceful, full-throated objection to any . . . continuation of the merits hearing." Tr. 17:5–8. No participant other than Mr. Robinson supported the continuance.

17. **The movant.** Mr. Robinson, the sole participant to seek the continuance, is a co-host of a fundraising reception held July 23, 2026 for Marty Quinn, then a candidate for Insurance Commissioner. The invitation to that reception reads: "Oklahoma Insurance Commissioner Glen Mulready & Commissioner John Doak (2011–2019) invite you for a fundraising reception benefiting Marty Quinn, Insurance Commissioner," and lists among its hosts "Karma & Brett Robinson." Exhibit I. Mr. Quinn's opponent in that election was Bob Sullivan, a party to this proceeding and one of the two participants the Department moved the previous evening to remove. Movants do not suggest that Mr. Robinson was disabled from seeking a continuance. They state the fact because it bears on whose interests the ruling served: the request came from a co-host of the Commissioner's fundraiser, the Department abandoned its written objection to delay in order to accommodate it, and the three participants who opposed it were overruled.

18. **The recess.** The Hearing Examiner then announced, "we're going to be in recess for about five minutes here, and then I'll come back and issue a decision." Tr. 19:7–9. The recess in fact ran from 9:21 to 9:34 a.m. Tr. 19:10. It lasted thirteen minutes, not five.

19. **What occurred during the recess is unknown and unknowable.** No participant appearing remotely could see or hear anything that occurred during that recess. No party knows whether Ms. Standerfer remained with the Hearing Examiner during it, or whether anything was said to him concerning the continuance. Nothing in the record answers either question, and no party has any means of answering them.

20. **The ruling reversed the position he had just stated.** Upon returning, the Hearing Examiner granted the motion to continue. Tr. 19:25. He thereby reached, after an unobserved recess inside a party's offices, the opposite of the disposition he had announced from the bench minutes earlier, over the objection of three of the four participants who addressed the question, and in favor of the one participant who requested it and the party that had abandoned its written position.

21. **No pending motion was decided.** The Hearing Examiner did not rule upon the Omnibus Pre-Hearing Motion, which had been fully briefed under the stipulated schedule and

which was the announced business of the conference. Apart from the stipulated exchange of witnesses, he did not rule upon any pending motion. He set argument on the Department's late-filed motion to dismiss for September 15, 2026, and deferred all other pending motions to that date. Tr. 20:1–13. The merits hearing was left unset, with the week of October 26, 2026 discussed as a target subject to securing a location. Tr. 22:20–25.

22. **The objection is not to the ruling.** Movants do not contend that the continuance was, standing alone, an abuse of discretion, and they are aware that a disqualification request resting solely upon a ruling is insufficient. *See Frazier v. Bruce*, 2021 OK 14, 484 P.3d 285. The objection is not to the ruling. It is to the circumstances in which the ruling was reached: an adjudicator who had just stated his disinclination to continue the hearing withdrew, for thirteen minutes and not the five he announced, into the physical custody of one party's offices and the company of that party's paralegal, beyond the observation of every other participant, and emerged having reversed himself.

23. **Oklahoma law does not tolerate that configuration.** In *Arbuckle Simpson Aquifer Protection Federation of Oklahoma, Inc. v. Oklahoma Water Resources Board*, 2013 OK 29, 343 P.3d 1266, the Supreme Court held that *ex parte* communications between a hearing officer and witnesses, relayed through the agency, created the impression of partiality and warranted a writ of mandamus compelling their disclosure. The Court emphasized that the object of administrative adjudication is a fair hearing before a neutral hearing officer, avoiding even the appearance of impropriety, and that the lack of due process resulting from a biased tribunal cannot be corrected on appeal. There the agency served as a conduit. Here no conduit was required: the adjudicator was already inside the party's space, attended by that party's staff, and deliberated there unobserved.

24. **The ex parte prohibition.** Title 75 O.S. § 313 forbids those assigned to render a decision from communicating, "directly or indirectly, in connection with any issue of fact, with any person or party," except upon notice and opportunity for all parties to participate. The Hearing Examiner is a contract examiner, not an agency member; Ms. Standerfer is not his personal assistant but the employee of a party. Whether the recess produced a communication within § 313, no party can say. That is the vice. The appearance of partiality is measured by what a reasonable observer may conclude, not by what the parties can prove about what they were prevented from observing.

25. **Structural context: the Hearing Examiner's engagement.** On information and belief, the Hearing Examiner has served as a contract hearing examiner for the Department for a period of years under a continuing, compensated engagement, the renewal of which lies within the Department's discretion. Oklahoma law presumes that one "who has a financial interest in the outcome of a decision, even a pretrial decision, cannot render a decision with 'the cold neutrality of an impartial judge.'" *Johnson v. Bd. of Governors of Registered Dentists*, 1996 OK 41, ¶ 37, 913 P.2d 1339, 1348. That presumption is not confined to a personal stake in the merits. *See Ward v. Village of Monroeville*, 409 U.S. 57, 59–62 (1972).

26. The word the Legislature chose is "independent." 36 O.S. § 319. Movants do not ask this Court to hold that every contract examiner is disqualified in every case, and they do not seek the production of the Hearing Examiner's contracts, invoices, or compensation records. They ask only that the September 4 conduct be assessed in the setting in which it occurred: a sole and

final adjudicator, compensated by a party, appearing from that party's space and attended by that party's staff, who then deliberated there beyond the sight and hearing of everyone else.

27. **The totality.** In *Bowen v. State ex rel. Oklahoma Real Estate Appraiser Board*, 2011 OK 86, 270 P.3d 133, the Supreme Court nullified a disciplinary proceeding because "the totality of the circumstances created an appearance of impartiality/conflict of interest," holding that "the appearance of impartiality is as important as an actual impartiality or a conflict of interest," *id.* ¶ 20, 270 P.3d at 137, and doing so where the conflicted individual was merely a witness who "was not a member of the Board, nor did she participate in the decision to discipline the appraiser," *id.* ¶ 21, 270 P.3d at 137–38. A conflict borne by the sole adjudicator himself is *a fortiori* disqualifying.

IV. GROUNDS FOR DISQUALIFICATION OF THE COMMISSIONER

A. The Commissioner is an anticipated witness for the Department.

28. During the scheduling discussion that followed the continuance ruling, counsel for the Department stated that the Commissioner was traveling for a conference during the week under discussion, that the Department anticipated he would be present for the hearing, and, in answer to the Hearing Examiner's question whether his presence was desired, that "we are anticipating that he may be a witness." Tr. 24:18–25:3. The Hearing Examiner responded: "Well, that — that's important." Tr. 25:4–5. That disclosure was made for the first time on September 4, 2026.

29. **Wilson controls.** In *Wilson v. Oklahoma Horse Racing Commission*, 1996 OK 3, 910 P.2d 1020, the Supreme Court vacated an administrative proceeding where the presiding steward had taken an active role in the underlying matter, presided over the hearing, and testified as a witness in it. The Court held that "the actions of Steward Charlie Cox in initiating and taking an active role in the matter . . . coupled with his presiding over the three-person Board and testifying in the case created a situation in which he should have disqualified himself," *id.* ¶ 15, 910 P.2d at 1023–24, and observed that there is no provision in law for a hearing examiner to testify as a witness in the proceedings. The Court adopted the rule that "[a] tribunal is not impartial if it is biased with respect to the factual issues to be decided at the hearing." *Id.* ¶ 16, 910 P.2d at 1024.

30. The Commissioner occupies each of the positions *Wilson* found intolerable in combination. He has already answered the question, having ruled by written order on April 7, 2026 that the presumption of a competitive market stood unrebutted. He convened this proceeding and stands at the head of the agency before which it is pending, and it is he who under 75 O.S. § 316 would ordinarily determine this very Affidavit. And the Department now anticipates calling him as its witness upon the identical question. *Accord Pitman v. Doty*, 1968 OK 16, 441 P.2d 428 (mandamus compelling a judge to certify his disqualification where he would be a material witness on the issues involved).

B. The Commissioner has formally and publicly decided the question presented.

31. **The April 7, 2026 order.** On April 7, 2026, in Case No. 26-0215-COR, the Commissioner denied a demand for a hearing on the competitiveness of the homeowners market, concluding that "the evidence supports a finding that the Oklahoma homeowners insurance market is competitive" and that the requesting party had "not provided any information or evidence sufficient to establish the burden of proof necessary to overcome the presumption of a competitive market." Exhibit G, ¶ 24. He resolved, by written order and without receiving evidence, the identical question of fact now noticed for hearing, and resolved it against the party bearing the burden of proof under 36 O.S. § 984(A).

32. **The public statements.** In an official Department release dated January 7, 2026, the Commissioner stated that "objective, well-established economic tools . . . show that the Oklahoma homeowners insurance market is competitive," and that this "reflects a competitive marketplace." In the Department's May 20, 2026 release announcing this hearing, he stated: "I also stand by my position that we have a competitive market for homeowners insurance coverage." He has written publicly that "Oklahoma operates within a competitive market" and that "declaring [homeowners] as noncompetitive would not be an option." Exhibits B, C, and E; see also Exhibits D and F. These statements are also catalogued at paragraphs 80 through 85 of the Omnibus Pre-Hearing Motion.

33. **Reaffirmation in the notice itself.** The significance of the May 20, 2026 statement is its timing. The Commissioner reaffirmed his conclusion in the very announcement that he would convene a hearing to determine it. A conclusion restated at the moment the evidentiary process is opened is a conclusion held independent of that process.

34. **Firm public statements before hearing disqualify.** *Wilson* expressly approved *Staton v. Mayes*, 552 F.2d 908, 914 (10th Cir. 1977), where "firm public statements before the hearing" by decisionmakers "reveal[ed] a tribunal not meeting the demands of due process for a hearing with fairness and the appearance of fairness." Federal courts apply the same measure to agency heads, asking whether "a disinterested observer may conclude that (the agency) has in some measure adjudged the facts as well as the law of a particular case in advance of hearing it" — the test adopted in *Cinderella Career & Finishing Schs., Inc. v. FTC*, 425 F.2d 583, 591 (D.C. Cir. 1970).

35. **Folsom is inapposite.** Should the Department invoke *Folsom Auto Supply v. Bristow*, 1954 OK 254, 275 P.2d 706, the case does not reach these facts. The prior ruling there arose from the commissioner's participation in review of evidence already in the record. The Commissioner here received no evidence. He denied a hearing, announced his conclusion publicly before any evidentiary process began, and reaffirmed it in the notice opening that process.

C. The Department cannot be neutral and an advocate at once.

36. The Department has represented to this Court that "[t]he Commissioner has appointed an independent hearing examiner to ensure that an objective determination is made based on the law and evidence presented." Department's Response to Omnibus Pre-Hearing Motion at 7. It has simultaneously moved to remove two participants who advocate the position it opposes, filed that motion after briefing closed, abandoned its written objection to delay within a day of making it, and now anticipates calling the agency head as its witness to prove the conclusion

he has already announced. Those postures cannot be reconciled, and Movants do not attempt to reconcile them. They ask only that the tribunal be constituted so that the question is decided by someone who has not already answered it.

D. The Commissioner publicly opposed the candidacy of a party to this proceeding.

37. Bob Sullivan is the person whose demand for a § 984 hearing the Commissioner denied by the April 7, 2026 order described above, and he is now a party to this proceeding and one of the two participants the Department has moved to remove. He was also a candidate for Insurance Commissioner in 2026.

38. Ten weeks after entering that order, on the day of the June 16, 2026 primary, the Commissioner posted publicly: "If anyone has questions or looking for insight on any candidates, I'm happy to discuss. Give me a call or text," and "I encourage you to vote for Marty Quinn." Exhibit J. Nine days after issuing the Notice of Hearing in this matter, on July 23, 2026, the Commissioner co-hosted a fundraising reception benefiting Mr. Quinn. Exhibit I. Mr. Sullivan defeated Mr. Quinn in the runoff held August 25, 2026.

39. Nine days after that runoff, the Department moved to remove Mr. Sullivan from this proceeding, and the hearing at which Movants intend to carry the burden of proof was continued on the motion of one of the fundraiser's co-hosts. Movants do not contend that the Commissioner was disabled from taking part in an election. They contend that an officer who campaigned publicly, and solicited contributions, against the person whose demand he had denied and who now appears before him cannot also be the officer who rules on that person's participation, presides over the agency prosecuting that question, and determines the affidavit seeking his own disqualification.

V. THE GOVERNING STANDARD

40. **Withdrawal is mandatory.** Under 75 O.S. § 316, a "hearing examiner or agency member *shall* withdraw from any individual proceeding in which he cannot accord a fair and impartial hearing or consideration," and any party may request disqualification by affidavit filed promptly and stating the grounds with particularity. The obligation to withdraw is not discretionary.

41. **Section 316 rests upon a constitutional floor.** Due process "entitles a person to an impartial and disinterested tribunal," and "[t]he lack of due process resulting from a biased tribunal cannot be corrected on appeal." *Johnson*, 1996 OK 41, ¶ 14, 913 P.2d at 1344 (adopting *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242 (1980)); *see* Okla. Const. art. II, § 7. Every litigant is entitled to "the cold neutrality of an impartial judge," and where "circumstances and conditions surrounding litigation are of such a nature that they might cast doubt and question as to the impartiality of any judgment the trial judge may pronounce, said judge should certify his disqualification." *Id.* ¶ 32, 913 P.2d at 1347–48. That standard "applies equally to administrative boards acting in an adjudicatory capacity as it does to judges." *Id.* ¶ 33, 913 P.2d at 1348.

42. **The standard is objective.** The question "is an objective standard and is not dependent on the judge's belief." *Id.* ¶ 32, 913 P.2d at 1348. It asks "whether the circumstances are of such nature to cause doubt as to his or her partiality, bias, or prejudice." *Bowen*, 2011 OK 86, ¶ 22, 270 P.3d at 138; *accord Merritt v. Hunter*, 1978 OK 18, 575 P.2d 623. Neither the Hearing Examiner's nor the Commissioner's subjective confidence in his own impartiality answers it. Due process is offended where "the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." *Withrow v. Larkin*, 421 U.S. 35, 47 (1975); *accord Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 877 (2009).

43. **The combination of functions is not the objection.** Movants do not contend that the combination of investigative and adjudicative functions within a single agency offends due process. *Withrow*, 421 U.S. at 47, 54–55; *cf. Cherokee Data Computer Parts & Servs., Inc. v. Okla. Dep't of Labor*, 2005 OK CIV APP 81, ¶¶ 15–17, 122 P.3d 56, 61–62. The objection here is narrower and different in kind. *Withrow* itself preserves this case-specific inquiry, requiring disqualification where "special facts and circumstances" render "the risk of unfairness . . . intolerably high." 421 U.S. at 58. *Wilson* drew the same line, disqualifying an individual adjudicator for his own conduct while acknowledging that combined agency functions are generally permissible. 1996 OK 3, ¶¶ 13, 15, 910 P.2d at 1023–24.

VI. DISPOSITION OF THIS AFFIDAVIT AND PRESERVATION

44. **Who decides.** The Hearing Examiner, and not the Commissioner, is the decisional officer in this proceeding. 36 O.S. §§ 313(A), 319. His order after hearing is final agency action, and the Commissioner has no power to review it. To the extent 75 O.S. § 316 would nonetheless commit the determination of this Affidavit to the administrative head of the agency, that determination cannot be made by an officer who is himself the subject of it and whom the Department anticipates calling as its witness. Movants accordingly request that the Commissioner take no part in the determination of this Affidavit. That a Commissioner may withdraw under § 316 is not novel in this Department: in *Roussel v. State ex rel. Grimes*, 1980 OK 101, 614 P.2d 53, the Insurance Commissioner disqualified himself and his staff under § 316 because a hearing conducted by them "might give the appearance that the hearing examiner was not impartial."

45. **The Governor has no role in replacing a hearing examiner.** Section 316 provides that "[u]pon the entry of an order of disqualification affecting a hearing examiner, the agency shall assign another in his stead or shall conduct the hearing itself." The duty runs to the agency, and the statute prescribes no method of selection. The Supreme Court has confirmed the negative. Construing this same section, it held that "the Governor is not authorized to appoint hearing examiners, but is only authorized to appoint individuals to serve in the place of disqualified members of the agency, such as the Insurance Commissioner." *Roussel v. State ex rel. Grimes*, 1980 OK 101, ¶ 20, 614 P.2d 53, 57. The successor examiner is assigned by the agency.

46. **The member pro tempore provision is conditional, and the condition post-dates Roussel.** Section 316 separately provides that upon the disqualification of an agency member the agency shall proceed if a quorum remains, and that "[i]f a quorum no longer exists, by virtue of the member's disqualification, the Governor immediately shall appoint a member pro tempore." That condition did not exist when *Roussel* was decided. The statute there construed read

simply: "Upon the disqualification of a member of an agency, the Governor immediately shall appoint a member pro tem to sit in place of the disqualified member in that proceeding." 75 O.S. 1971, § 316, quoted in *Roussel*, 1980 OK 101, ¶ 5, 614 P.2d at 55. The Legislature has since conditioned the Governor's role upon the agency's inability to proceed.

47. **No member pro tempore is required here.** Movants do not dispute that Roussel describes the Insurance Commissioner as "a member of an agency." *Id.* ¶ 20. The reason a member pro tempore was needed there is that the Commissioner was himself the adjudicator: his disqualification left no one to hear the application, and the Court accordingly held that the Governor's appointee "became an Insurance Commissioner pro tem" and "was acting as the Insurance Commissioner" for purposes of conducting the hearing and issuing the order. *Id.* This proceeding is not built that way. Under 36 O.S. §§ 319 and 313(A) the independent hearing examiner receives the evidence and signs the final order, and that order is final agency action. The Commissioner's withdrawal from a decisional and supervisory role therefore leaves the agency able to proceed — the adjudication continues before the examiner. Nothing remains that a member pro tempore would be needed to do, and the quorum condition is not engaged. What remains is a single ministerial act: the assignment of a successor examiner, which § 316 commits to the agency without prescribing how the agency must choose.

48. **The successor should be one the parties agree upon.** Two statutes govern the character of that appointment. Section 319 requires that the examiner be *independent*. Section 307 requires that matters be heard "in person, by authorized *disinterested* employees or by hearing examiners appointed by the Commissioner for that purpose." 36 O.S. § 307. Those are the Legislature's words. Where the objection is precisely that the examiner was selected and is compensated by one party, the selection method that plainly satisfies both words is one in which no party selects alone. Movants accordingly request that the parties of record be directed to confer and to submit an agreed successor examiner within ten (10) days; that if the parties do not agree, they be directed to assemble a list of no more than seven (7) qualified persons, none having any present or prior contractual, compensated, or employment relationship with the Department, and to arrive at a selection by alternating strikes. Nothing in § 316 forbids that procedure. It is the procedure most likely to produce an examiner whose neutrality no party will later be heard to question — and it removes from the Department the very act that gave rise to this Affidavit.

49. **No further substantive rulings should issue.** A decision-maker's continued participation while a disqualification request is pending deprives a party of due process. The rule is settled for trial judges, and the reasoning applies with equal force to a § 316 administrative adjudicator. *Clark v. Bd. of Educ. of Indep. Sch. Dist. No. 89*, 2001 OK 56, 32 P.3d 851; *Miller Dollarhide, P.C. v. Tal*, 2007 OK 58, 163 P.3d 548 (it is not a matter of discretion to refrain from presiding over the case until the disqualification ruling is memorialized and the movant has exhausted the available procedure). Movants request that no further substantive ruling issue until this Affidavit is determined, including the argument presently set for September 15, 2026.

50. **A written order is necessary.** Judicial review of this proceeding is confined to the record. 75 O.S. § 321; *Leo*, 2023 OK 96, 536 P.3d at 953. Movants request that the disposition of this Affidavit be memorialized in a written order stating the reasons for the ruling and the findings on which it rests, and that the record of the September 4, 2026 conference — including the fact and duration of the recess — be preserved.

51. **Preservation.** Movants reserve the right to seek an original writ of mandamus or prohibition in the Supreme Court of Oklahoma under Article VII, Section 4 of the Oklahoma Constitution should this Affidavit be denied. *See Arbuckle Simpson*, 2013 OK 29, 343 P.3d 1266 (issuing the writ before final order, because a lack of due process from a biased tribunal cannot be corrected on appeal). They further reserve the right to supplement this Affidavit should additional facts concerning the September 4, 2026 recess become known.

VII. GROUNDS STATED WITH PARTICULARITY

52. The grounds upon which it is claimed that a fair and impartial hearing cannot be accorded are:

(a) the Hearing Examiner appeared at the September 4, 2026 conference from within the Department's space, against a Department background and in the physical company of the Department's paralegal, while the Department is a party;

(b) the Hearing Examiner stated on the record that he was not particularly wanting to move the hearing date, then recessed for thirteen minutes after announcing a five-minute recess, and returned and granted a continuance over the objection of three participants;

(c) that recess was taken inside the party's offices, beyond the observation of every remote participant, in circumstances in which no party can determine what was said to him and nothing in the record answers the question;

(d) the Hearing Examiner declined to rule upon the fully briefed Omnibus Pre-Hearing Motion or upon other pending motions, and deferred them to a date set for argument on the Department's late-filed motion;

(e) the Hearing Examiner is compensated by the Department under a continuing engagement subject to the Department's renewal, while 36 O.S. § 319 requires that he be independent and 36 O.S. § 313(A) makes his order final agency action subject to no intra-agency review;

(f) the Department anticipates calling the Commissioner as its witness upon the question to be adjudicated;

(g) the Commissioner determined that same question by written order on April 7, 2026, without receiving evidence, against the party bearing the burden of proof;

(h) the Commissioner has publicly and repeatedly announced that the Oklahoma homeowners insurance market is competitive, including in the Department release announcing this hearing; and

(i) ten weeks after denying Bob Sullivan's demand for this hearing, the Commissioner publicly urged voters to support Mr. Sullivan's opponent, and nine days after issuing the Notice of Hearing co-hosted a fundraising reception for that opponent, of which the sole participant who moved for the continuance was also a host; and

(j) the Commissioner, so situated, would otherwise be the officer determining this Affidavit.

VIII. RELIEF REQUESTED

WHEREFORE, PREMISES CONSIDERED, the State of Oklahoma, ex rel. the Attorney General, and Bob Sullivan respectfully request that:

1. the Honorable John D. Miller withdraw from this proceeding pursuant to 75 O.S. § 316, and that another hearing examiner having no contractual, compensated, or continuing engagement with the Oklahoma Insurance Department be assigned in his stead;

2. the Insurance Commissioner withdraw from any adjudicative, decisional, or supervisory role in this proceeding, including any determination of this Affidavit;

3. no further substantive ruling be entered in this proceeding, including the argument set for September 15, 2026, until this Affidavit is determined;

4. the parties of record be directed to confer and to submit an agreed successor hearing examiner within ten (10) days of the order of disqualification; and that, failing agreement, they assemble a list of no more than seven (7) qualified persons, none having any present or prior contractual, compensated, or employment relationship with the Oklahoma Insurance Department, and arrive at a selection by alternating strikes;

5. the determination of this Affidavit be memorialized in a written order stating the reasons for the ruling and the findings on which it rests, and that the record of the September 4, 2026 pre-hearing conference be preserved and made available to the parties; and

6. the Court grant such other and further relief as is fair, reasonable, necessary, and proper to secure a fair and impartial tribunal.

VERIFICATION

Each of the undersigned declares under penalty of perjury under the laws of the State of Oklahoma that the factual statements set forth in this Affidavit are true and correct of his own personal knowledge, except those matters expressly stated upon information and belief, which he believes to be true, and except those matters expressly attributed to the other affiant.

Reggie N. Whitten, OBA No. 9576
Counsel for the Oklahoma Attorney General

Subscribed and sworn to before me this 10th day of September, 2026.

Notary Public

KAYLI PRICE NOTARY # 24000271 EXP. 01/05/28 PUBLIC STATE OF OKLAHOMA

My Commission Expires: 01-05-28
Commission No.: 24000271

Michael J. Hunter, OBA No. 4503
Counsel for Bob Sullivan

Subscribed and sworn to before me this 10th day of September, 2026.

Notary Public

KAYLI PRICE NOTARY # 24000271 EXP. 01/05/28 PUBLIC STATE OF OKLAHOMA

My Commission Expires: 01-05-28
Commission No.: 24000271

Respectfully submitted,

Reggie N. Whitten, OBA No. 9576
Michael Burrage, OBA No. 1350
Blake Sonne, OBA No. 20341
Hannah Whitten, OBA No. 35261
Jake Denne, OBA No. 35097
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Email: Mike@mjhlaw.net

Attorney for Bob Sullivan

INDEX OF EXHIBITS

Exhibit A	Notice of Hearing, filed July 14, 2026 (Case No. 26-0820-TRN)
Exhibit B	Okla. Ins. Dep't, "Economic Indicators Show Oklahoma's Homeowners Insurance Market Is Competitive" (Jan. 7, 2026)
Exhibit C	Okla. Ins. Dep't, "Insurance Commissioner Comments on Legislative Changes; Announces Intent to Hold Public Hearing" (May 20, 2026)
Exhibit D	Jeff Elkins, "Oklahoma Insurance Department to Host Market Competitiveness Hearing," The Oklahoman
Exhibit E	Okla. Ins. Dep't, "Understanding the Evolving Insurance Landscape"
Exhibit F	"OK Insurance Department Will Hold Public Hearing in September," The Oklahoman (June 5, 2026)
Exhibit G	Order Regarding Request for Section 984 Hearing, entered April 7, 2026 (Case No. 26-0215-COR)
Exhibit H	Transcript of Pre-Hearing Conference held September 4, 2026 (Case No. 26-0820-TRN)
Exhibit I	Invitation to fundraising reception benefiting Marty Quinn, hosted by Insurance Commissioner Glen Mulready and others (July 23, 2026)
Exhibit J	Facebook post of Glen Mulready (June 16, 2026)

CERTIFICATE OF SERVICE

I, Reggie N. Whitten, hereby certify that on this 10th day of September 2026, a true and correct copy of the above and foregoing *Joint Affidavit of the Oklahoma Attorney General and Bob Sullivan in Support of Disqualification of the Independent Hearing Examiner and of the Insurance Commissioner Pursuant to 75 O.S. § 316* was filed with the Oklahoma Insurance Department by electronic mail to OIDlegal@oid.ok.gov, and was served by electronic mail upon:

Nicole M. Nash
Antuanya "Bo" DeBose
Oklahoma Insurance Department, Legal Division
OIDlegal@oid.ok.gov
Nicole.nash@oid.ok.gov
Bo.debose@oid.ok.gov

The Honorable John D. Miller
Independent Hearing Examiner
Oklahoma Insurance Department
[via OIDlegal@oid.ok.gov]

Craig MacIntyre
Oklahoma Insurance Commissioner Candidate
Craigforcommish26@gmail.com

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GABLEGOTWALS
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Oklahoma City, OK 73102
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Brett Robinson
Oklahoma P&C Advocacy Association

608 E. Eubanks St.
Oklahoma City, OK 73105
brobinson@hbstrategies.us

Reggie N. Whitten

Reggie N. Whitten

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984 AS TO WHETHER THE OKLAHOMA HOMEOWNERS INSURANCE MARKET IS NONCOMPETITIVE	**CASE NO. 26-0820-TRN**

EXHIBIT A

Notice of Hearing, filed July 14, 2026 (Case No. 26-0820-TRN)

FILED

JUL 14 2026

INSURANCE COMMISSIONER OKLAHOMA

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE:	**HEARING PURSUANT TO 36 O.S. § 984 AS TO WHETHER THE OKLAHOMA HOMEOWNERS INSURANCE MARKET IS NONCOMPETITIVE**	))))	**Case No. 26-0820-TRN**

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN that the Oklahoma Insurance Commissioner, pursuant to his authority under 36 O.S. §§ 307 and 984 and OAC 365:1-7-1(a), shall hold a hearing for the purpose of determining whether the homeowners insurance market in Oklahoma is noncompetitive. This hearing is set before an independent hearing examiner for **Monday, September 14, 2026, at 9 A.M., at the Oklahoma State Capitol, Multi-Purpose Room 100, 2300 N. Lincoln Blvd., Oklahoma City, OK 73105.**

NOTICE IS FURTHER GIVEN that the Oklahoma Insurance Commissioner invites all interested parties with a direct, immediate, and substantial interest in the determination of whether or not the homeowners insurance market in Oklahoma is noncompetitive, including all property and casualty insurers writing homeowners insurance business in Oklahoma and the Oklahoma Attorney General pursuant to 74 O.S. § 18b(22), to participate in the public hearing and offer evidence and argument on the issues involved. Persons wishing to participate shall file an entry of appearance by emailing OIDlegal@oid.ok.gov.

NOTICE IS FURTHER GIVEN that the independent hearing examiner may, after hearing and taking of all evidence and argument presented at the hearing, issue an order determining whether or not the homeowners insurance market in Oklahoma is noncompetitive and grant such other relief as he deems fair, reasonable, necessary, proper, and equitable in the premises. This hearing is NOT for the purpose of determining whether any particular homeowners rates are excessive; nor is it for addressing any claims issues.

Pursuant to 36 O.S. § 984, a competitive market for a line of insurance is presumed to exist. The burden of proving the market for a line of insurance is noncompetitive is placed upon the party(ies) advocating the position that competition does not exist. *Id.* In determining whether a reasonable degree of competition exists within a line of insurance, the following factors shall be considered:

a. the number of insurers actively engaged in writing coverage,
b. market shares of the leading writers and the changes in market shares over a reasonable period of time,
c. existence of financial or economic barriers that could prevent new firms from entering the market,
d. measures of market concentration and changes of market concentration over time,
e. whether long-term profitability for insurers in the market is reasonable in relation to industries of comparable business risk, and
f. the relationship of insurers' costs to revenue over a reasonable period of time.

Id. Currently, Oklahoma is a "use and file" state for homeowners rate filings, meaning insurers must file rates with the Oklahoma Insurance Department ("OID") no later than thirty (30) days after the effective date. 36 O.S. § 987. "In a noncompetitive market, every insurer shall file with the Commissioner all rates, supplementary rate information and supporting information at least thirty (30) days before the proposed effective date." *Id.* In a competitive market, no rate may be determined to be excessive. 36 O.S. § 985(A)(1). If a determination is made that a market is noncompetitive, any rate in effect at that time "shall be deemed to be in compliance with the laws of this state unless disapproved pursuant to the procedures and rating standards contained in Sections 985 through 989 of Title 36 of Oklahoma Statutes that are applicable to noncompetitive markets." 36 O.S. § 985.1.

GLEN MULREADY
INSURANCE COMMISSIONER
STATE OF OKLAHOMA

CERTIFICATE OF MAILING

I, Nicole M. Nash, hereby certify that a true and correct copy of the above and foregoing *Notice of Hearing* was sent by certified mail with postage prepaid and return receipt requested on this 14th day of July, 2026, to:

Gentner Drummond Oklahoma Attorney General 313 NE 21st St. OKC, OK 73105	CERTIFIED MAIL NO. 9589 0710 5270 3996 5733 02
State Farm Fire & Casualty Company 1 State Farm Plaza Bloomington, IL 61710-0001	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 29
Allstate Vehicle & Property Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 12
Farmers Insurance Company, Inc. 6301 Owensmouth Avenue Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 05
Homesite Indemnity Company 290 Congress St., Suite 400 Boston, MA 02210	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 92
American Economy Insurance Company 175 Berkeley St. Boston, MA 02116-5066	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 85
United Services Automobile Association P.O. Box 34330 D-2W San Antonio, TX 78265-4330	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 78
American Mercury Insurance Company 500 N. Meridian Ave., Suite 401 OKC, OK 73107-5755	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 61
CSAA General Insurance Company 3055 Oak Road Walnut Creek, CA 94597	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 54
Mid-Century Insurance Company 6301 Owensmouth Ave. Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 47
Shelter Mutual Insurance Company 1817 W Broadway Columbia, MO 65218	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 30
USAA Casualty Insurance Company 9800 Fredericksburg Road San Antonio, TX 78288	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 23

Oklahoma Farm Bureau Mutual Insurance Company 2501 N. Stiles Ave. OKC, OK 73105	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 16
American Farmers & Ranchers Mutual Insurance Company P.O. Box 24000 OKC, OK 73124-4000	CERTIFIED MAIL NO. 9589 0710 5270 3996 5729 09
Allstate North American Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 93
USAA General Indemnity Company 9800 Fredericksburg Road San Antonio, TX 78288	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 86
American Strategic Insurance Corp. 1 ASI Way St. Petersburg, FL 33702-23514	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 79
American Modern Property & Casualty Insurance Company P.O. Box 5323 Cincinnati, OH 45201-5323	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 62
Encompass Insurance Company of America 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 55
Travelers Personal Insurance Company 1 Tower Sq. Hartford, CT 06183	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 48
Safeco Insurance Company of America 175 Berkeley St. Boston, MA 02116-5066	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 31
Garrison Property & Casualty Insurance Company 9800 Fredericksburg Road San Antonio, TX 78288	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 24
Great Northwest Insurance Company 1030 W County Road E, Suite 210 Shoreview, MN 55126	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 17
American Bankers Insurance Company of Florida P.O. Box 979199 Miami, FL 33197-9199	CERTIFIED MAIL NO. 9589 0710 5270 3996 5728 00
Liberty Mutual Personal Insurance Company 175 Berkeley St. Boston, MA 02116	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 94

North Star Mutual Insurance Company 269 Barstad Road S Cottonwood, MN 56229	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 87
Great Northern Insurance Company 202 Halls Mill Road, Suite B White House Station, NJ 08889	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 70
Massachusetts Bay Insurance Company 440 Lincoln St. Worcester, MA 01653	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 63
Country Preferred Insurance Company P.O. Box 2020 Bloomington, IL 61702-2020	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 56
Privilege Underwriters Reciprocal Exchange 1 North Lexington Ave., Suite 1900 White Plains, NY 10601	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 49
Farmers Mutual Fire Insurance Company of Okarche P.O. Box 9 Okarche, OK 73762-0009	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 32
Foremost Insurance Company, Grand Rapids, Michigan P.O. Box 2450 Grand Rapids, MI 49501	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 25
American Risk Insurance Company, Inc. 4669 Southwest Fwy, Suite 700 Houston, TX 77027	CERFITIED MAIL NO. 9589 0710 5270 3996 5727 18
Allstate Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5727 01
Allstate Indemnity Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 95
Encompass Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 88
Casualty Corporation of America, Inc. P.O. Box 1120 Jones, OK 73049-1120	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 71
MS Transverse Insurance Company 15 Independence Blvd., Suite 430 Warren, NJ 07059	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 64

Allstate Property & Casualty Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 57
Goodville Mutual Casualty Company 625 W Main St. P.O. Box 489 New Holland, PA 17557-0489	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 40
National Summit Insurance Company 6031 Connection Drive, Suite 250 Irving, TX 75039	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 33
Peerless Indemnity Insurance Company 175 Berkeley St. Boston, MA 02116	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 26
Lyndon Southern Insurance Company 10751 Deerwood Park Blvd.. Suite 200 Jacksonville, FL 32256	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 19
The Travelers Home & Marine Insurance Company 1 Tower Sq. Hartford, CT 06183	CERTIFIED MAIL NO. 9589 0710 5270 3996 5726 02
Farmers Casualty Insurance Company 6301 Owensmouth Avenue Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 58
MDOW Insurance Company 2200 W. Alabama, Suite 210 Houston, TX 77098	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 96
Evanston Insurance Company 10275 W. Higgins Road, Suite 750 Rosemont, IL 60018	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 89
Federal Insurance Company 202 Halls Mill Road, Suite B White House Station, NJ 08889	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 72
Vigilant Insurance Company 436 Walnut Street Philadelphia, PA 19106	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 65
National Security Fire & Casualty Company 661 E Davis Elba, AL 36323	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 58
Union Mutual Insurance Company 9400 Broadway Extension, Suite 500 OKC, OK 73114	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 41

Trumbull Insurance Company 1 Hartford Plaza Hartford, CT 06155	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 34
American Summit Insurance Company 6031 Connection Drive, Suite 250 Irving, TX 75039	CERTIFIED MAIL NO. 9589 0710 5270 3996 5725 27
Accelerant Specialty Insurance Company 400 Northridge Road, Suite 800 Sandy Springs, GA 30350	CERTIFIED MAIL NO. 9589 0710 5270 4100 3950 01
Rock Ridge Insurance Company B-7 Tabonuco Street, Suite 912 Guaynabo, PR 00968	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 12
Markel American Insurance Company 4521 Highwoods Parkway Glen Allen, VA 23060	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 29
Farmers Insurance Exchange 6301 Owensmouth Avenue Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 36
Cimarron Insurance Company, Inc. 7301 Carmel Executive PK Dr., Suite 102 Charlotte, NC 28226	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 43
AIG Property Casualty Company 1271 Avenue of the Americas, FL 37 New York, NY 10020-1304	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 50
Lemonade Insurance Company 5 Crosby St, 3rd Floor New York, NY 10013	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 67
Spinnaker Insurance Company 1 Pluckemin Way, Suite 102 Bedminster Township, NJ 07921	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 74
Alliance Indemnity Company P.O. Box 1401 McPherson, KS 67460	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 81
Homeowners of America Insurance Company 1400 Corporate Dr., Suite 300 Irving, TX 75038	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 98
Amica Mutual Insurance Company 100 Amica Wy Lincoln, RI 02865-1156	CERTIFIED MAIL NO. 9589 0710 5270 4100 3949 05
Liberty Mutual Fire Insurance Company 175 Berkeley St. Boston, MA 02117	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 99

Foremost Property & Casualty Insurance Company P.O. Box 2450 Grand Rapids, MI 49501	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 82
The Standard Fire Insurance Company 1 Tower Sq. Hartford, CT 06183	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 75
Pacific Indemnity Company 2000 Arch Street Philadelphia, PA 19103	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 68
Beasley Excess & Surplus Insurance, Inc. The Rutherford Building 65 Memorial Road, Suite 320 West Hartford, CT 06107	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 51
Esurance Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 44
Farmers Property & Casualty Insurance Company 6301 Owensmouth Avenue Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 37
Liberty Mutual Insurance Company 175 Berkeley St. Boston, MA 02117	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 20
Economy Premier Assurance Company 6301 Owensmouth Avenue Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 13
Progressive Northern Insurance Company 6300 Wilson Mills Rd. W33 Mayfield Village, OH 44143-2182	CERTIFIED MAIL NO. 9589 0710 5270 4100 3948 06
Armed Forces Insurance Exchange 550 Eisenhower Rd. Leavenworth, KS 66048	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 90
American Modern Home Insurance Company P.O. Box 5323 Cincinnati, OH 45201	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 83
Chubb Custom Insurance Company 202B Halls Mill Road White House Station, NJ 08889	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 76
LM Insurance Corporation 175 Berkeley St. Boston, MA 02116-0140	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 69

Hartford Insurance Company of the Southeast One Hartford Plaza Hartford, CT 06155	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 52
Horace Mann Insurance Company 1 Horace Mann Plaza Springfield, IL 62715-0001	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 45
Teachers Insurance Company 1 Horace Mann Plaza Springfield, IL 62715-0001	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 38
Farmers Alliance Mutual Insurance Company 1122 N. Main St. McPherson, KS 67460-2846	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 21
Branch Insurance Exchange P.O. Box 68 Portsmouth, NH 03802	CERTIFIED MAIL NO. 9589 0710 5270 4100 3947 14
Travelers Commercial Insurance Company 1 Tower Sq. Hartford, CT 06183-1190	CERTIFID MAIL NO. 9589 0710 5270 4100 3947 07
Century-National Insurance Company P.O. Box 3199 Winston Salem, NC 27102	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 91
Republic-Vanguard Insurance Company P.O. Box 809076 Dallas, TX 75380-9076	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 84
Vault E&S Insurance Company 300 1st Ave. S., Suite 401 St. Petersburg, FL 33701	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 77
Homesite Insurance Company 290 Congress St., Suite 400 Boston, MA 02210	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 60
Trisura Insurance Company 210 Park Avenue, Suite 1300 OKC, OK 73102	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 53
Scottsdale Insurance Company 1 W Nationwide Blvd, DSPF-76 Columbus, OH 43215-2220	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 46
Zurich American Insurance Company 1299 Zurich Way Schaumburg, IL 60196	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 39
Vault Reciprocal Exchange 300 First Avenue South, Suite 401 St. Petersburg, FL 33701	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 65

Liberty Insurance Corporation 175 Berkeley St. Boston, MA 02117	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 22
Spinnaker Specialty Insurance Company 1 Pluckemin Way, Suite 102 Bedminster, NJ 07921	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 15
Stillwater Insurance Company 6800 Southpoint Pkwy, Suite 700 Jacksonville, FL 32216	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 08
Twin City Fire Insurance Company 1 Hartford Plaza Hartford, CT 06155-0001	CERTIFIED MAIL NO. 9589 0710 5270 4100 3946 92
Praetorian Insurance Company 10 Terrace CT, Suite 300 Madison, WI 53718	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 85
Executive Risk Indemnity, Inc. 202 Halls Mill Road, Suite B White House Station, NJ 08889	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 78
Hartford Accident & Indemnity Company 1 Hartford Plaza Hartford, CT 06155	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 61
MS Transverse Specialty Insurance Company 15 Independence Blvd, Suite 430 Warren, NJ 07059	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 54
Toggle Insurance Company 6301 Owensmouth Avenue Woodland Hills, CA 91367	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 47
Central Insurance Company 800 S. Washington St. Van Wert, OH 45891	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 30
Integon Indemnity Corporation P.O. Box 3199 Winston-Salem, NC 27102-3199	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 72
Lexington Insurance Company 99 High ST, FL 23 Boston, MA 02110	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 23
American Security Insurance Company 260 Interstate North Cir SE Atlanta, GA 30339-2110	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 16
Emerald Bay Specialty Insurance Company 177 Madison Avenue, Suite 1004 Morristown, NJ 07960	CERTIFIED MAIL NO. 9589 0710 5270 4100 3945 36

North Light Specialty Insurance Company 3100 Sanders Road, Suite 201 Northbrook, IL 60062-7154	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 43
Esurance Property & Casualty Insurance Company P.O. Box 469011 San Antonio, TX 78246	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 50
American Hallmark Insurance Company of Texas 5400 Lyndon B Johnson Freeway, Suite 400 Dallas, TX 75240	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 67
InsureMax Insurance Company 100 Galleria Parkway, Suite 800 Atlanta, GA 30339	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 74
Mount Vernon Fire Insurance Company 1190 Devon Park Dr. Wayne, PA 19087	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 81
New South Insurance Company P.O. Box 3199 Winston-Salem, NC 27102	CERTIFIED MAIL NO. 9589 0710 5270 3996 5730 98
Progressive Direct Insurance Company P.O. Box 89490 Cleveland, OH 44101-6490	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 04
Chubb National Insurance Company 202 Halls Mill Road, Suite B White House Station, NJ 08889	CERTIFIED MAIL NO. 95890 710 5270 3996 5731 11
Standard Guaranty Insurance Company 260 Interstate North Circle SE Atlanta, GA 30339-2111	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 28
Sutton National Insurance Company 110 E. Atlantic Ave., Suite 330 Delray Beach, FL 33444	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 35
The Travelers Indemnity Company of America 1 Tower Sq. Hartford, CT 06183-1190	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 42
State National Insurance Company, Inc. 1900 L Don Dodson Dr. Bedford, TX 76021	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 59
Hartford Insurance Company of the Midwest 1 Hartford Plaza Hartford, CT 06155	CERTIFID MAIL NO. 9589 0710 5270 3996 5731 66

The Automobile Insurance Company of Hartford, Connecticut 1 Tower Sq. Hartford, CT 06183	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 73
United Security Insurance Company 6640 S. Cicero Avenue Bedford Park, IL 60638	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 80
KW Specialty Insurance Company 14851 N Scottsdale Road, Suite 203 Scottsdale, AZ 85254	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 97
Canopius US Insurance, Inc. 200 S Wacker Dr., Suite 950 Chicago, IL 60606	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 03
Property & Casualty Insurance Company of Hartford 1 Hartford Plaza Hartford, CT 06155	CERTIFIED MAIL NO. 9589 0710 5270 3996 5731 10
QBE Insurance Corporation 10 Terrace Ct., Suite 300 Madison, WI 53718	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 27
American Family Connect Property & Casualty Insurance Company 6000 American Parkway Madison, WI 53783	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 34
American National General Insurance Company 1949 E Sunshine St. Springfield, MO 65899-0001	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 41
Country Mutual Insurance Company P.O. Box 2020 Bloomington, IL 61701-2020	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 89
American National Property & Casualty Company 1949 E Sunshine St. Springfield, MO 65899-0001	CERTIFIED MAIL NO. 9589 0710 5270 3996 5732 96

Nicole Nash

Nicole M. Nash

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984
AS TO WHETHER THE OKLAHOMA HOMEOWNERS
INSURANCE MARKET IS NONCOMPETITIVE

CASE NO. 26-0820-TRN

EXHIBIT B

Oklahoma Insurance Department, "Economic Indicators Show Oklahoma's Homeowners Insurance Market Is Competitive" (January 7, 2026)

OKLAHOMA INSURANCE DEPARTMENT

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For Immediate Release:
January 7, 2026

Insurance Market Is Competitive

By Oklahoma Insurance Commissioner Glen Mulready

Public discussion about Oklahoma's homeowners insurance market has intensified in recent months, with some critics suggesting the market lacks competition. However, objective, well-established economic tools that are widely accepted by the Department of Justice, Federal Trade Commission, fellow regulators, and economists show that the Oklahoma homeowners insurance market is competitive. This isn't determined by rhetoric or perception, and it doesn't mean that premium costs aren't rising or invalidate homeowners' concerns about affordability, which is my top focus along with legislative leaders.

Two of the most commonly used measures of market concentration are the Herfindahl-Hirschman Index (HHI) and the Four-Firm Concentration Ratio (CR4). These tools provide a clear, data-driven way to assess whether a market is competitive or dominated by a small number of firms.

The Herfindahl-Hirschman Index, the primary benchmark for measuring market concentration, uses companies' market shares to yield a single score. Markets with scores below 1500 are considered unconcentrated and competitive, while those above 2500 are highly concentrated and non-competitive. Oklahoma's HHI score is 1362, indicating its homeowners insurance market is clearly competitive by this standard. Oklahoma's score is below this threshold for at least the past five years. The HHI is relied upon by federal entities when evaluating mergers, acquisitions, and potential antitrust concerns.

Less reliable but often cited is the CR4, or Four-Firm Concentration Ratio, that measures the combined market share of the four largest firms in a given market. Scores 0-40% are considered low concentration. Scores 40-70% are considered medium concentration, and scores 70-100% are considered high concentration. Oklahoma's CR4 score is 60%. Used alongside the HHI, it helps confirm whether competition is robust or limited.

When these objective economic tools are applied to Oklahoma's homeowners insurance market, they show a market characterized by multiple active insurers and meaningful consumer choice. No single company—or small group of companies—controls an outsized share of the market. By the standards used nationally and internationally, this reflects a competitive marketplace.

Based on previous news stories, it is important for consumers to know these facts. Insurance market competition is not decided by individual opinions, but by transparent, repeatable economic analysis using metrics that are universally recognized by regulatory authorities.

As critical discussions about insurance affordability and availability continue, grounding the conversation in objective economic analysis—rather than speculation—will help ensure policy decisions are informed by facts rather than perception.

Media questions or comments should be directed to
Chief of Communications, Liz Heigle
Liz.Heigle@oid.ok.gov | (405) 819-2221

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BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984 AS TO WHETHER THE OKLAHOMA HOMEOWNERS INSURANCE MARKET IS NONCOMPETITIVE	**CASE NO. 26-0820-TRN**

EXHIBIT C

Oklahoma Insurance Department, "Insurance Commissioner Comments on Legislative Changes; Announces Intent to Hold Public Hearing" (May 20, 2026)

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For Immediate Release:
May 20, 2026

Insurance Commissioner Comments on Legislative Changes; Announces Intent to Hold Public Hearing

OKLAHOMA CITY – Insurance Commissioner Glen Mulready today made the following statements regarding legislation signed into law and the announcement of a public hearing regarding homeowners market status:

"I have shared many times over the past year that there was no authority in our statutes to intervene in filed rates from insurers in our homeowners market. I'm pleased to see this addressed with the signing of HB 3781. The department has already begun preparing for this new file and use process, which will become effective on July 1, 2027. This new process allows us to review filed rates throughout the year and push back against any excessive rate that is not actuarily confirmed by our own regulatory team."

"However, I am very disappointed that other opportunities to pass consumer protection legislation we highlighted in December last year were killed by industry lobbyists and trial lawyers this session. These were simple reforms that have been implemented in other states where markets have rebounded, including mandatory mediation. For too long, trial lawyers have disguised profit-driven litigation as consumer protection while Oklahoma families and businesses pay the price through higher insurance premiums. We cannot allow excessive litigation to become a business model that drives affordability further out of reach for hardworking Oklahomans."

"I also stand by my position that we have a competitive market for homeowners insurance coverage. All significant indicators (including those used by the Department of Justice, Federal Trade Commission, Federal Reserve, and the National Association of Insurance Commissioners) support our analysis of market concentration. However, considering this new law and to provide certainty for future rate filing processes, I am announcing today that we will convene a public hearing in September to determine whether a reasonable degree of concentration does or does not exist in Oklahoma's homeowners insurance market. This hearing will allow presentations of evidence from different parties about this topic so that we can receive a formal opinion from an independent hearing officer and move forward accordingly."

"Finally, I am keenly aware of the political posturing and maneuvering that takes place around policy issues facing Oklahomans during campaign season. This hearing is being set beyond our upcoming primary elections so that it is not a runaway train for political candidates to get an extra soundbite. We have worked hard to stay in our lane and have remained laser focused on developing policy ideas, getting homes FORTIFIED™ and wrapping up investigations into roof claims. We look forward to a new rate filing process and future next steps."

Media questions or comments should be directed to
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BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984
AS TO WHETHER THE OKLAHOMA HOMEOWNERS
INSURANCE MARKET IS NONCOMPETITIVE

CASE NO. 26-0820-TRN

EXHIBIT D

Jeff Elkins, "Oklahoma Insurance Department to Host Market Competitiveness Hearing," The Oklahoman

THE OKLAHOMAN

BUSINESS

Oklahoma Insurance Department to host market competitiveness hearing

Jeff Elkins
The Oklahoman

July 15, 2026, 9:54 a.m. CT

In an attempt to determine whether the homeowners insurance market in the state is noncompetitive, Oklahoma Insurance Commissioner Glen Mulready has issued a notice for a hearing this fall before an independent examiner.

The hearing is scheduled for 9 a.m. Monday, Sept. 14 at the multipurpose room 100 in the State Capitol, 2300 N. Lincoln Blvd.

An Oklahoma Insurance Department announcement sent out Tuesday invites those with a "direct, immediate and substantial interest in the determination of whether or not the homeowners insurance market in Oklahoma is noncompetitive, including all property and casualty insurers writing homeowners insurance business in Oklahoma and the Oklahoma Attorney General," to participate in the public hearing and offer evidence and argument.

The meeting comes as Oklahomans face some of the highest homeowners insurance rates in the nation, with average premiums exceeding $5,000 to $7,000 annually. This financial burden has sparked heightened scrutiny over whether the state's insurance market is truly competitive and adequately serving homeowners.

More: Oklahoma homeowners still pay the highest insurance rates in the US, 2026 study shows

State Farm, Allstate face lawsuits over insurance claims

Two of the nation's largest insurance companies, State Farm and Allstate, have been under increasing fire in the last year, embroiled in hundreds of lawsuits filed in Oklahoma by residents, and two by state Attorney General Gentner Drummond, who is also a gubernatorial candidate. The lawsuits accuse the companies of executing internal schemes to deny or minimize valid wind and hail damage claims to maximize profits.

However, the notice states the hearing is not for the purpose of determining whether any particular homeowner's rates are excessive, or addressing any claims issues.

The meeting to investigate competitiveness in the market represents a regulatory pivot, and may come as a surprise to some, because Mulready, the agency's outgoing head, has generally maintained a hands-off approach to regulating the state's insurance industry through his tenure.

Mulready has maintained his belief that Oklahoma has a competitive insurance market based on market concentration indicators, including those used by the U.S. Department of Justice, Federal Trade Commission, Federal Reserve and the National Association of Insurance Commissioners.

"With the passage of the new law and to provide certainty for future rate-filing processes, the (OID) announced that it will hold a public hearing in September to formally determine whether a reasonable degree of market concentration exists. The hearing will allow all interested parties to present evidence before an independent hearing officer," said Liz Heigle, spokesperson for the Oklahoma Insurance Department.

The agency's statement references House Bill 3781, which shifts Oklahoma from a use-and-file system, which permits insurance companies to implement new rates immediately, to a file-and-wait framework. The law requires companies to file new rates alongside supporting actuarial data at least 30 days in advance for competitive markets and 60 days for noncompetitive markets. It takes effect on July 1, 2027.

After the hearing concludes, the examiner may issue an order determining whether or not the homeowners insurance market in Oklahoma is noncompetitive and "grant such other relief as he deems fair, reasonable, necessary, proper and equitable."

A September date avoids primary-season, which was Mulready's intention, according to a May release. It also ensures that skyrocketing premiums and industry oversight will remain a talking point ahead of the November general election.

Those wishing to participate are asked to file an entry of appearance by emailing OIDlegal@oid.ok.gov.

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984
AS TO WHETHER THE OKLAHOMA HOMEOWNERS
INSURANCE MARKET IS NONCOMPETITIVE

CASE NO. 26-0820-TRN

EXHIBIT E

Oklahoma Insurance Department, "Understanding the Evolving Insurance Landscape"

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Understanding the Evolving Insurance Landscape

Climbing Insurance Premiums: Understanding the Evolving Insurance Landscape

By Commissioner Glen Mulready

Throughout the country, consumers are experiencing higher premiums in all lines of insurance that are hitting the consumer's pocketbooks quite hard. I get phone calls, emails and on occasion the harsh social media comment that I am doing nothing to prevent higher premiums in Oklahoma. I thought sharing some key information could help explain this current situation.

The Oklahoma Insurance Department (OID) holds a vital position in the oversight of insurer rate filings, particularly in the Property & Casualty (P&C) lines of insurance. As consumers navigate the complex world of insurance premiums, it is crucial to shed light on our rate review process, its limitations, and the importance of empowering consumers in today's evolving insurance landscape.

We can first look at the transparency and regulatory framework. Our Rate and Form Division, operating under its statutory authority, is responsible for thoroughly reviewing insurer rate filings. The provisions outlined in Title 36 of the Oklahoma Statutes define competitive and noncompetitive markets, establish rate-making standards, and lay out filing requirements. Currently, Oklahoma operates within a competitive market, which mandates insurers to submit rates and supplementary rating information.

Next is the evaluation of rate changes. Our primary focus is assessing whether insurers' rate changes align with their actuarial indications. In cases where deviations arise, we seek clarification from the companies to understand the rationale behind these alterations. In a competitive market, rates can only be disapproved if they are deemed to be inadequate or unfairly discriminatory, not based on being excessively high.

You may be thinking that the real problem may be the limited authority we have over the rates in Oklahoma. The only way we can expand that authority over rates is if a market is declared to be "noncompetitive" through a public hearing process that requires compelling evidence. Given the multitude of insurers and rate variations in markets like Homeowners (HO), where 120 insurers are active, and Private Passenger Auto (PPA), 125 active insurers, declaring one of these as noncompetitive would not be an option.

For Oklahoma consumers facing unexpectedly high renewal premiums, the OID advises shopping around for alternative coverage options. Consumers can obtain quotes from different carriers by reaching out to other insurers or independent agents. However, it is crucial to compare policies accurately by ensuring the same coverages, limits, and other factors are considered. This approach takes advantage of the rate variation in the market and can potentially (and often does) result in cost savings.

In an evolving insurance landscape, it is crucial to foster consumer empowerment and encourage a competitive free market that benefits all stakeholders. Despite limitations, OID plays a critical role in ensuring rates are not inadequate or unfairly discriminatory. By actively exploring alternative insurance options, consumers can exercise their right to make informed choices and potentially reduce their insurance costs.

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BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984
AS TO WHETHER THE OKLAHOMA HOMEOWNERS
INSURANCE MARKET IS NONCOMPETITIVE

CASE NO. 26-0820-TRN

EXHIBIT F

"OK Insurance Department Will Hold Public Hearing in September,"
The Oklahoman (June 5, 2026)

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could give public a voice on rates

J.C. Hallman Oklahoma Watch
June 5, 2026, 9:45 a.m. CT

Oklahoma Insurance Commissioner Glen Mulready was against it at first, then for it.

On May 20, less than six weeks after he denied a request for a public hearing on whether Oklahoma's homeowners insurance market is competitive, Mulready announced an identical hearing to be held in September.

In the same announcement, Mulready addressed recent substantive changes to Oklahoma insurance law — already signed by Gov. Kevin Stitt — that directly affect whether the skyrocketing rates that have been crippling Oklahoma homeowners' budgets for years can be challenged.

The changes in law and the competition hearing are directly related — and the devil is in the details.

Mulready's announcement reiterated his position that Oklahoma law prevented his office from challenging excessive rates.

More: CompSource conversion approved, but policyholders sue to stop it

"I have shared many times over the past year that there was no authority in our statutes to intervene in filed rates from insurers," Mulready wrote.

The problem is, that's not entirely true.

Title 36 stipulates that rates in a competitive market cannot be challenged; however, rates can be challenged after a non-competitive market has been declared.

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Oklahoma law does not specify when a hearing might be called. Mulready's call for a September hearing comes just six months before the end of his eight-year tenure as commissioner; he has called for no other hearing on competition.

'You'd need an aggressive commissioner'

Scrutiny of Oklahoma's homeowners market began a little more than a year ago when reporters debunked what had become an article of faith: hailstorms alone explained why Oklahoma had some of the highest homeowners rates in the country.

That Oklahoma Watch investigation revealed that Mulready had been the primary source for a Wall Street Journal article that suggested as much, but the data Mulready supplied to the Journal revealed the opposite: Oklahoma had less hail but higher premiums than both Kansas and Texas.

Mulready backpedaled with another insurance department announcement: "It's Not Just Hail: A Look Into Oklahoma Homeowners Rates."

Here, Mulready alluded to the statutory provision that would have enabled him to regulate excessive rates.

"OID has no statutory authority to set or approve homeowners rates except in certain, extraordinary circumstances," the announcement said.

Oklahoma insurance law makes no reference to extraordinary circumstances.

Subsequent reporting on competitive markets uncovered irregularities in how Oklahoma calculates whether its market is competitive. Oklahoma Watch's own analysis revealed that, at best, Oklahoma is an oligopoly. That is, a market dominated by a small number of firms whose outsized market share opens the door for non-competitive behavior.

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package failed to become law.

By way of contrast, House Bill 3781, authored by Rep. Stacy Jo Adams, R-Duncan, and subsequently championed by a bipartisan collection of lawmakers, sailed through the House and the Senate and was quickly signed into law.

HB 3781, in modifying the portion of Title 36 known as the Property and Casualty Competitive Loss Cost Rating Act, primarily did two things. First, it shifted Oklahoma's homeowners laws from a use-and-file system, which enabled insurers to implement rate hikes without any scrutiny at all, to a more Texas-style file-and-use system, which requires the insurance department to engage actuaries — insurance accountants — to study rate increases within 30 days of filing to determine whether they are truly necessary.

Second, HB 3781 eliminated the statutory prohibition — hearing or no hearing — on challenging excessive rates.

Veteran federal administrator and longtime insurance consumer advocate J. Robert Hunter, who spoke to Oklahoma legislators at one of two interim studies last fall, praised the changes to Oklahoma law as a small step in the right direction, but warned that there were obstacles embedded in the bill that could make its practical implementation difficult.

Specifically, Hunter said the 30-day window for evaluating rate increases was not sufficient. Furthermore, the requirement of careful actuarial scrutiny was problematic because the Oklahoma Insurance Department, unlike the Texas Insurance Department, does not employ a team of actuaries.

"It does strike the language that made it impossible to challenge excessive rates," Hunter said. "You do have the opportunity to challenge a rate, but you have only 30

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Hunter was also struck by the fact that the new law will not go into effect until July 1, 2027. He speculated that if insurance companies were going to resist implementation of the new law, it could become a political hot potato.

"There's going to be more fighting over this, on both sides," Hunter said.

'If the market is competitive, prove it'

On Feb. 24, Bob Sullivan, one of five candidates running for Mulready's job alongside fellow Republicans Greta Shuler, Marty Quinn, and Chris Meredith, and Democrat Craig MacIntyre, formally requested a hearing on competitiveness in a letter addressed to Mulready.

"I represent Oklahoma policyholders who intend to participate as a party to this proceeding," Sullivan's letter read.

A press release issued at the same time struck a firmer tone.

"If the market is competitive, prove it," Sullivan said. "If it's not, it's time for leadership that puts Oklahoma families first."

Oklahoma law required a response to the request within 30 days. Mulready was two weeks late; his denial of the hearing relied on hair-splitting legal equivocations.

"Mr. Sullivan has not provided any information or evidence sufficient to establish the burden of proof necessary to overcome the presumption of a competitive market," Mulready's April 7 decision read.

Six weeks later, on May 20, Mulready flip-flopped and called for a hearing himself.

Mulready refused an interview request regarding his May 20 statement.

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After saying he was pleased by statutory changes he never advocated for himself, Mulready criticized plaintiffs' attorneys who, in recent years, have been winning significant settlements on behalf of policyholders who felt cheated when their insurance companies denied claims.

In January, a poll revealed that 88% of Oklahomans support the right of policyholders to sue insurance companies.

Muready attempted to link litigation costs to the broader affordability crisis.

"We cannot allow excessive litigation to become a business model that drives affordability further out of reach for hardworking Oklahomans," Mulready wrote.

Oklahoma City plaintiffs attorney Jeff Marr, who has been suing insurance companies for decades, said that blaming Oklahoma policyholders and the lawyers who represent them for rising insurance premiums was both misleading and dangerously ignorant.

"Suggesting that consumers exercising their legal rights are responsible for premium increases shifts the cost of insurer misconduct back onto Oklahoma families," Marr said. "[That] is not consumer protection. It is protection for insurance companies."

Although Mulready announced a hearing to determine competitiveness, he also said he already believes the market to be competitive.

"I also stand by my position that we have a competitive market for homeowners insurance coverage," Mulready wrote.

Although Mulready said the hearing would feature evidence from as-yet-unnamed parties and result in an opinion from an independent hearing officer — also

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"Calling a hearing in which [Mulready] declares the result in advance? Love it," consumer advocate Hunter said, with a sarcastic harrumph.

The date of the public hearing has not yet been set. If held, and if the public is allowed to speak, the hearing may represent the only opportunity Oklahoma homeowners will have to express frustrations over skyrocketing rates directly to Mulready before he leaves office.

Oklahoma Watch, at oklahomawatch.org, is a nonprofit, nonpartisan news organization that covers public-policy issues facing the state.

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984 AS TO WHETHER THE OKLAHOMA HOMEOWNERS INSURANCE MARKET IS NONCOMPETITIVE	**CASE NO. 26-0820-TRN**

EXHIBIT G

Order Regarding Request for Section 984 Hearing, entered April 7, 2026
(Case No. 26-0215-COR)

FILED

APR 07 2026

INSURANCE COMMISSIONER
OKLAHOMA

BEFORE THE INSURANCE COMMISSIONER OF THE
STATE OF OKLAHOMA

IN RE:	Request by BOB SULLIVAN, an Oklahoma resident, for a hearing pursuant to 36 O.S. § 984	)))	Case No. 26-0215-COR

ORDER

The State of Oklahoma, ex rel. Glen Mulready, Insurance Commissioner, having fully reviewed the correspondence from Mr. Sullivan and comprehensive data relating to the current Oklahoma homeowners' insurance market, finds and orders as follows:

JURISDICTION AND APPLICABLE LAW

1. Glen Mulready is the Insurance Commissioner of the State of Oklahoma ("Commissioner") and as such is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O.S. §§ 101 *et seq.*

2. In particular, the Insurance Commissioner has jurisdiction over the Property and Casualty Competitive Loss Cost Rating Act, 36 O.S. §§ 981 – 999, which regulates the use and filing of homeowners insurance rates for the State of Oklahoma.

3. Pursuant to 36 O.S. § 985(A)(1), "No rate in a competitive market may be determined to be excessive. A rate in a noncompetitive market may be determined to be excessive if it is likely to produce a profit that is unreasonably high for the insurance provided."

4. Pursuant to 36 O.S. § 984(A), "A competitive market is presumed to exist for a line of insurance unless the Commissioner, after a hearing, issues an order stating that a reasonable degree of competition does not exist in the market. The burden of proof in any hearing shall be placed on the party or parties advocating the position that competition does not exist. Any ruling that a market is not competitive shall identify the factors causing the market not to be competitive...."

Any such ruling may be challenged and appealed to the Oklahoma County District Court. 36 O.S. § 984(B)(3).

5. "In determining whether a reasonable degree of competition exists within a line of insurance, the Commissioner shall consider the following factors:

a. the number of insurers actively engaged in writing coverage,

b. market shares of the leading writers and the changes in market shares over a reasonable period of time,

c. existence of financial or economic barriers that could prevent new firms from entering the market,

d. measures of market concentration and changes of market concentration over time,

e. whether long-term profitability for insurers in the market is reasonable in relation to industries of comparable business risk, and

f. the relationship of insurers' costs to revenue over a reasonable period of time."

36 O.S. § 984(B)(1).

6. No other statute provides any definition or other criteria for measuring and determining whether an insurance market is competitive or noncompetitive.

7. OAC 365:1-7-1(a) states:

> The Insurance Commissioner may hold hearings on any matters within his/her jurisdiction under the Insurance Code, either upon his/her own motion or upon written demand therefor by any person aggrieved by any act, threatened act, or failure to act of the Insurance Commissioner or by any report, regulation, rule or order of the Insurance Commissioner. The written demand for hearing should specify the grounds to be relied upon as a basis for relief demanded at the hearing.

FINDINGS OF FACT

8. On or around March 9, 2026, a letter from Bob Sullivan addressed to the Insurance Commissioner was hand-delivered to the Oklahoma Insurance Department, 400 NE 50th Street, Oklahoma City, OK 73105. Exhibit 1, Letter from Bob Sullivan (Mar. 9, 2026).

9. The letter formally requests that the Insurance Commissioner hold a hearing pursuant to 36 O.S. § 984 and OAC 365:1-7-1 regarding whether a reasonable degree of competition exists within the Oklahoma homeowners insurance market.

10. As support for the request, the letter references "numerous news stories regarding the cost of homeowners insurance in Oklahoma in recent months," media reports that Oklahomans pay highest premiums in the country for homeowners insurance, an investigation by the Oklahoma Attorney General into the conduct of insurers providing homeowners' insurance, and an Order issued by Former Insurance Commissioner John Doak in 2016 relating to earthquake insurance rates.

11. The letter also states Mr. Sullivan represents Oklahoma policyholders who intend to participate as parties to the proceedings but does not name any of those individuals nor explain in what capacity he represents such policyholders.

12. The letter does not include nor cite to any specific supporting evidence, information, or data.

13. The Insurance Commissioner and Oklahoma Insurance Department staff closely monitor and analyze the Oklahoma homeowners insurance market, including its market concentration and rate increases and decreases, through required financial statements and filings, rate filings, market data calls, and other submissions of documents and data. The findings of fact provided herein are based on this data and analysis.

14. On or around September 30, 2025 and October 7, 2025, the Insurance Commissioner

presented at interim studies before the Oklahoma Legislature regarding homeowners insurance rates. Those interim studies also included various presenters representing both insurance companies and consumers.

15. In 2024, around 109 different insurance companies, making up at least fifty-three (53) different group codes, were actively writing homeowners insurance coverage in Oklahoma.

16. No single company—or group of affiliated companies—controls more than 31% of the homeowners insurance market.

17. Well-established economic tools widely accepted by the Department of Justice, the Federal Trade Commission, fellow regulators, and economists evidence that Oklahoma's homeowners insurance market is competitive.

18. The Herfindahl-Hirschman Index, the primary benchmark for measuring market concentration, uses companies' market shares to yield a single score. Markets with scores below 1500 are considered unconcentrated and competitive, while those above 2500 are highly concentrated and non-competitive. Oklahoma's HHI score is 1362. Oklahoma's HHI score has been within a competitive threshold for at least the past five (5) years. See Exhibit 2, Okla. Ins. Dep't, Presentation at September 30, 2025 Legislative Interim Study on Rising Homeowner Insurance Rates, pg. 5; see also Exhibit 3, Insurance Commissioner Glen Mulready, *Economic Indicators Show Oklahoma's Homeowners Insurance Market is Competitive* (Jan. 7, 2026), https://www.oid.ok.gov/getready1_2026/.

19. The CR4, or Four-Firm Concentration Ratio, measures the combined market share of the four largest firms in a given market. Scores 0-40% are considered low concentration. Scores 40-70% are considered medium concentration, and scores 70-100% are considered high concentration. Oklahoma's CR4 score is around 60%. Although less reliable, the CR4 score in combination with

Oklahoma's HHI score helps confirm the competitiveness of the Oklahoma homeowners insurance market. See id.

20. The following chart shows the combined ratios for companies writing homeowners insurance coverage in Oklahoma from 2020 to 2024. In four (4) out of the five (5) years, the top twenty (20) companies issuing homeowners insurance in Oklahoma on average experienced underwriting losses.

Homeowners Combined Ratios for Writers in Oklahoma		
Year	Average of All Companies	Average of Top 20 Companies
2024	108.11%	101.15%
2023	136.55%	134.78%
2022	78.76%	79.77%
2021	100.97%	106.83%
2020	98.64%	101.80%
S&P Global Market Intelligence	Combined Ratio	
2024	109.80%	
2023	136.00%	
2022	83.30%	
2021	103.20%	
2020	101.90%	

Exhibit 2, Okla. Ins. Dep't, Presentation at September 30, 2025 Legislative Interim Study on Rising Homeowner Insurance Rates, pg. 6.

21. In 2025, thirty-three (33) rate changes for homeowners insurance products were filed with the OID by the twenty (20) insurance companies holding the largest market shares of homeowners insurance coverage in Oklahoma. Nineteen (19) of these filings included no overall rate impact increases. Two (2) filings were overall rate impact decreases of -0.5 and -6.2. Fourteen (14)

of these filings included overall rate impact increases ranging from 2.6% to 31.9%—with eleven (11) of these filings being between ten percent (10%) to twenty percent (20%) and six (6) being under ten percent (10%). See Okla. Ins. Dep't, SERFF State Rate Change Report – Homeowners (01/01/2025 to 12/31/2025), https://www.oid.ok.gov/wp-content/uploads/2026/03/2025-HO-SERFF-State-Rate-Change-Report.pdf. Overall, rate increases for 2025 were substantially less than rate increases filed in previous years and reflect a downward trend.[1]

22. The current Oklahoma homeowners insurance market is not similar to the earthquake insurance market that existed in Oklahoma in 2016 for the following reasons. Although more than one hundred (100) companies were actively writing earthquake insurance coverage around 2015 and 2016, that coverage was mostly add-on coverage to existing homeowners insurance. It is also a catastrophic loss coverage, which is significantly different than homeowners insurance coverage. Audio Recording of May 24, 2016 Hearing, Case No. 16-0391-TRN.

23. The earthquake insurance market experienced a significant shift between 2010 to 2015 with more consumers and less business owners purchasing the coverage by 2015. *Id.* In 2010, direct premiums written in Oklahoma were around $6.7 million. By 2015, the direct premium amount written was around $18.8 million. See Exhibit 4, State of Okla., ex rel. John D. Doak to All Licensed Property and Casualty Insurers, et al., Case No. 16-0391-TRN, Notice of Hearing filed (Apr. 18, 2016); see also Exhibit 5, State of Okla., ex rel. John D. Doak to All Licensed Property and Casualty Insurers, et al., Case No. 16-0391-TRN, Order In Re: Earthquake Insurance Rates filed (June 5, 2016). From 2010 to 2015, total premiums written were around $76.3 million while only around $4.3 million was paid out in claims—for a pure direct loss ratio of around three percent (3%).

[1] Rate filings submitted to the Oklahoma Insurance Department are public record upon their effective date and may be viewed electronically by visiting the OID's website at https://www.oid.ok.gov/regulated-entities/rate-and-form-filing/public-rate-and-form-filings/.

Id. Yet, in 2015, earthquake insurance carriers filed twelve (12) rate increase filings ranging from four percent (4%) to three hundred percent (300%). Audio Recording of May 24, 2016 Hearing, Case No. 16-0391-TRN.

CONCLUSIONS OF LAW

24. Taking into consideration the factors listed in 36 O.S. § 984(B)(1) and applying the findings of facts provided above, the evidence supports a finding that the Oklahoma homeowners insurance market is competitive and does not support a hearing pursuant to 36 O.S. § 984. Mr. Sullivan has not provided any information or evidence sufficient to establish the burden of proof necessary to overcome the presumption of a competitive market. Nor has Mr. Sullivan established that he or any other consumer has standing under 36 O.S. § 984 and OAC 365:1-7-1.

25. The evidence establishes that the current Oklahoma homeowners insurance market is not similar to the earthquake insurance market that existed in Oklahoma in 2016. The most significant contributing factor to the determination of a noncompetitive market for earthquake insurance in 2016 was the fact that earthquake carriers were seeking rate increases of four percent (4%) to three hundred percent (300%) despite high profitability over the previous five (5) years and only a 3% direct loss ratio. Those facts contrast greatly with the current homeowners market where rate increases filed range from 2.6% to 31.9% and the top twenty (20) homeowners carriers in Oklahoma have overall experienced underwriting losses over the past five (5) years.

ORDER

IT IS THEREFORE ORDERED that Mr. Sullivan's request for a hearing pursuant to 36 O.S. § 984 and OAC 365:1-7-1 is denied. However, the Insurance Commissioner is extremely focused on protecting Oklahoma consumers on this very important issue. The Insurance Commissioner has been actively and diligently working with the legislature to pursue legislation changes that would offer greater consumer protections in the homeowners insurance market, as well as stabilizing rates, utilizing regulatory measures to assist consumers, investigate, and take enforcement action against homeowners insurance companies that are not in compliance with the law.

WITNESS My Hand and Official Seal this _7__ day of April, 2026.

GLEN MULREADY
INSURANCE COMMISSIONER
STATE OF OKLAHOMA

CERTIFICATE OF MAILING

I, Nicole M. Nash, hereby certify that a true and correct copy of the above and foregoing *Order* was sent by certified mail with postage prepaid and return receipt requested and by email on this 7th day of April, 2026, to:

Bob Sullivan
[redacted]

CERTIFIED MAIL NO. 9589 0710 5270 2711 7098 80

Bob Burke
BURKE LAW FIRM
512 North Broadway Avenue, Suite 300
Oklahoma City, OK 73102
405-802-1495
bob@bobburkelaw.com

CERTIFIED MAIL NO. 9589 0710 5270 2711 7098 97

Nicole Nash

Nicole M. Nash

February 24, 2026

Commissioner Glen Mulready

Oklahoma Insurance Department

400 NE 50th St. Oklahoma City, OK 73105

Dear Commissioner Mulready:

There have been numerous news stories regarding the cost of homeowners insurance in Oklahoma in recent months. Media outlets have reported that several studies find that Oklahomans' pay the highest premiums in the country for this coverage. In addition, the Oklahoma Attorney General has begun an investigation into the conduct of insurers who provide this coverage.

Your position on this matter has relied on your allegation that competition exists among insurance companies in the market, proscribing your ability to intervene on behalf of Oklahoma insureds, presumably pursuant to 36 O.S. Section 984, which provides, inter alia, "A competitive market is presumed to exist for a line of insurance unless the Commissioner after a hearing, issues an order stating that a reasonable degree of competition does not exist in the market."

I'm attaching an order issued by a former Commissioner John Doak in 2016 relating to earthquake insurance rates. After a hearing to determine whether competition existed in that marketplace, Doak determined that despite 119 insurers writing earthquake coverage, the four largest writers market share "exceeded 50% at all times for the six years preceding December 31, 2015." His order found that a reasonable degree of competition did not exist, and that earthquake insurance was a noncompetitive line of insurance.

Commissioner Doak's finding is based on market share data eerily similar to that which exists in Oklahoma today in which four major players control over half the homeowners' insurance market. In addition, Doak made his finding of no competition with 119 insurers writing earthquake insurers. Oklahoma has less than 100 companies writing homeowners insurance.

I am formally requesting you hold a hearing pursuant to 36 O.S. Section 984 and OAC 365:1-7-1. I represent Oklahoma policy holders who intend to participate as a party to this proceeding which requires you to consider the following factors:

"a. the number of insurers actively engaged in writing coverage,

b. market shares of the leading writers and the changes in market shares over a reasonable period of time,

c. existence of financial or economic barriers that could prevent new firms from entering the market,

EXHIBIT

1

d. measures of market concentration and changes of market concentration over time,

e. whether long-term profitability for insurers in the market is reasonable in relation to industries of comparable business risk, and

f. the relationship of insurers' costs to revenue over a reasonable period of time."

Pursuant to OAC 365:1-7-1(b) you "shall either set down the matter for hearing within thirty (30) days from the receipt of the demand therefor or shall issue a written order denying hearing."

Respectfully,

Bob Sullivan

Candidate for Oklahoma Insurance Commissioner 2026

Bob Sullivan

18566 S Park Pl

Inola, OK 74036

BOB BURKE
512 NORTH BROADWAY AVENUE
SUITE 300
OKLAHOMA CITY, OK 73102

RECEIVED
FRONT DESK
MAR 09 2026
OKLAHOMA INSURANCE DEPT.

Hon. Glen Mulready

* CARRIE

BOB BURKE
512 NORTH BROADWAY AVENUE
SUITE 300
OKLAHOMA CITY, OK 73102

RECEIVED
FRONT DESK
MAR 09 2026
OKLAHOMA INSURANCE DEPT.

Nicole NASH, Esq.

OKLAHOMA
INSURANCE
DEPARTMENT

SEPTEMBER 2025

Glen Mulready – Insurance Commissioner

INSURANCE COMMISSIONER
STATE OF OKLAHOMA

EXHIBIT
2

State Rate Filings

- Prior Approval – 14
- File and Use – 30
- Use and File – 8
- No File - 1

OKLAHOMA
INSURANCE
DEPARTMENT

Oklahoma Statutory Reference

OK 36-984

B. 1. In determining whether a reasonable degree of competition exists within a line of insurance, the Commissioner shall consider the following factors:

a. the number of insurers actively engaged in writing coverage,

b. market shares of the leading writers and the changes in market shares over a reasonable period of time,

c. existence of financial or economic barriers that could prevent new firms from entering the market,

d. measures of market concentration and changes of market concentration over time,

e. whether long-term profitability for insurers in the market is reasonable in relation to industries of comparable business risk, and

f. the relationship of insurers' costs to revenue over a reasonable period of time.

2. All determinations by the Commissioner shall be made on the basis of findings of fact and conclusions of law.

3. The ruling may be challenged in the district court.

OK 36-985

A.1. No rate in a competitive market may be determined to be excessive. A rate in a non-competitive market may be determined to be excessive if it is likely to produce a profit that is unreasonably high for the insurance provided.

Herfindahl-Hirschman Index (HHI)

"A measure of the state of firms in relation to the industry they are in and is an indicator of the amount of competition among them."

Formula = the sum of the squares of each company's marketshare.

DOJ MEASUREMENT

0 – 1500	Unconcentrated Market (Competitive)
1500 – 2500	Moderately Concentrated
2500+	High Concentration (Non-competitive)

OK HOMEOWNER'S MARKET HHI SCORES

2024	1158
2023	1173
2022	1106
2021	1045
2020	1147

Combined Loss Ratios

HO LOB Combined Ratios for Writers in Oklahoma		
Year	Industry Average by Market Share	Average of Top 20 Companies
2024	108.11%	101.15%
2023	136.55%	134.78%
2022	78.76%	79.77%
2021	100.97%	106.83%
2020	98.64%	101.80%
S&P Global Market Intelligence	Combined Ratio	
2024	109.80%	
2023	136.00%	
2022	83.30%	
2021	103.20%	
2020	101.90%	

OKLAHOMA
INSURANCE
DEPARTMENT

OK READY

STRENGTHEN OKLAHOMA HOMES PROGRAM

23 Contractors
4 Evaluators

3 Pilot Phases

46 homes completed and grants paid

339 applications in process

615 applications available

$446,075.58 paid out in grants

FORTIFIED ROOF

On average, Homeowners have saved $730 on their premiums after fortifying their homes.

OKLAHOMA INSURANCE DEPARTMENT

WWW.OID.OK.GOV

Oklahoma Insurance Department | Insurance Commissioner Glen Mulready | 800.522.0071

For Immediate Release:
January 7, 2026

Economic Indicators Show Oklahoma's Homeowners Insurance Market Is Competitive

By Oklahoma Insurance Commissioner Glen Mulready

Public discussion about Oklahoma's homeowners insurance market has intensified in recent months, with some critics suggesting the market lacks competition. However, objective, well-established economic tools that are widely accepted by the Department of Justice, Federal Trade Commission, fellow regulators, and economists show that the Oklahoma homeowners insurance market is competitive. This isn't determined by rhetoric or perception, and it doesn't mean that premium costs aren't rising or invalidate homeowners' concerns about affordability, which is my top focus along with legislative leaders.

Two of the most commonly used measures of market concentration are the Herfindahl-Hirschman Index (HHI) and the Four-Firm Concentration Ratio (CR4). These tools provide a clear, data-driven way to assess whether a market is competitive or dominated by a small number of firms.

The Herfindahl-Hirschman Index, the primary benchmark for measuring market concentration, uses companies' market shares to yield a single score. Markets with scores below 1500 are considered unconcentrated and competitive, while those above 2500 are highly concentrated and non-competitive. Oklahoma's HHI score is 1362, indicating its homeowners insurance market is clearly competitive by this standard. Oklahoma's score is below this threshold for at least the past five years. The HHI is relied upon by federal entities when evaluating mergers, acquisitions, and potential antitrust concerns.

Less reliable but often cited is the CR4, or Four-Firm Concentration Ratio, that measures the combined market share of the four largest firms in a given market. Scores 0-40% are considered low concentration. Scores 40-70% are considered medium concentration, and scores 70-100% are considered high concentration. Oklahoma's CR4 score is 60%. Used alongside the HHI, it helps confirm whether competition is robust or limited.

When these objective economic tools are applied to Oklahoma's homeowners insurance market, they show a market characterized by multiple active insurers and meaningful consumer choice. No single company—or small group of companies—controls an outsized share of the market. By the standards used nationally and internationally, this reflects a competitive marketplace.

Based on previous news stories, it is important for consumers to know these facts. Insurance market competition is not decided by individual opinions, but by transparent, repeatable economic analysis using metrics that are universally recognized by regulatory authorities.

As critical discussions about insurance affordability and availability continue, grounding the conversation in objective economic analysis—rather than speculation—will help ensure policy decisions are informed by facts rather than perception.

Media questions or comments should be directed to
Chief of Communications, Liz Heigle

EXHIBIT
3

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel. JOHN D. DOAK, Insurance Commissioner,	)	
To:	)	**Case No. 16-0391-TRN**
All Licensed: Property and Casualty Insurers, Rating and Advisory Organizations Re Earthquake Insurance in the State of Oklahoma.	)	

FILED
APR 1 3 2016
INSURANCE COMMISSIONER OKLAHOMA

NOTICE OF HEARING

COMES NOW the State of Oklahoma, ex rel. John D. Doak, Insurance Commissioner, by and through counsel, Gordon C. Amini, and alleges and states as follows:

JURISDICTION

1. John D. Doak is the Insurance Commissioner of the State of Oklahoma and as such is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O. S. §§ 101- 7301.

2. Affected by this Notice are licensed insurers, rating and advisory organizations ("insurers") re earthquake insurance covering property located in the State of Oklahoma.

3. The Property and Casualty Competitive Loss Cost Rating Act (36 O.S. §§ 981-999) ("Rating Act") regulates the filing and use of earthquake insurance rates for the State of Oklahoma.

4. In a competitive market, as defined in § 982 of the Rating Act, insurers are permitted to use insurance rates as long as such rates and supplementary rate information are filed with the Commissioner within thirty (30) days following the effective date of the filing.

PETITIONER EXHIBIT 1

EXHIBIT 4

December 31, 2015, indicates that approximately 150 companies offer some form of coverage. Almost all such coverages are provided as an add-on to homeowners insurance and very little coverage is available on a "stand-alone" basis. Because of the prevalence of multi-coverage discounts many policyholders have purchased homeowners, auto, boat, ATV, and umbrella liability from the same company. The difficulty in switching carriers to obtain a better price or lower deductible on earthquake coverage, greatly limits the competitiveness of the earthquake line of insurance.

8. Earthquake insurance, like flood insurance, is protection for homes and businesses against catastrophic damage. Without reasonably priced earthquake insurance, many Oklahomans could not afford to rebuild seriously damaged or destroyed property. Before the current trickle of rate increases becomes a flood, the Commissioner has determined to act proactively to protect the greater public interest in maintaining a viable competitive market for earthquake insurance.

9. Information collected from insurance companies demonstrates that 70% of the earthquake insurance, written in Oklahoma, is concentrated in only a few companies.

10. The Commissioner has, just this week, issued a mandatory call to the companies for detailed earthquake claims data. This data will be carefully reviewed to ensure that consumers are treated fairly.

WHEREFORE, affected insurers are hereby given notice of a hearing to be held at 8:00 a.m. on the 24th day of May 2016, at the Office of the Insurance Commissioner, Five Corporate Plaza, 3625 NW 56th St., Oklahoma City, OK 73112. The purpose of the hearing is to determine whether a reasonable degree of competition exists in the Oklahoma market for earthquake insurance. In determining whether a reasonable degree of competition exists, the Commissioner shall consider the following factors:

a. the number of insurers actively engaged in writing coverage;

b. market shares of the leading writers and the changes in market shares over a reasonable period of time;

c. existence of financial or economic barriers that could prevent new firms from entering the market;

d. measures of market concentration and changes of market concentration over time;

e. whether long-term profitability for insurers in the market is reasonable in relation to industries of comparable business risk; and,

f. the relationship of insurers' costs to revenue over a reasonable period of time.

If after hearing, the Commissioner determines that a reasonable degree of competition does not exist, the Commissioner shall issue an order designating earthquake insurance as a noncompetitive line of insurance in the State of Oklahoma.

The proceedings shall be conducted in accordance with the Oklahoma Administrative Procedures Act, 75 O.S. §§ 301-323. The Commissioner or his designee shall conduct the hearing. A recording of the proceedings will be available upon request. The Insurance Department requests that any person desiring to be heard, provide written notice to Gordon C. Amini, General Counsel, prior to May 17, 2016 at 3625 NW 56th St., Suite 100, Oklahoma City, OK 73112

WITNESS My Hand and Official Seal this 15th day of April, 2016.

JOHN D. DOAK
INSURANCE COMMISSIONER
STATE OF OKLAHOMA

Gordon C. Amini, General Counsel
3625 NW 56th St., Suite 100
Oklahoma City, OK 73112
(405) 522-6335

Hearings

2016 ALL PROPERTY AND CASUALTY INSURERS, RATING AND ADVISORY ORGANIZATIONS HEARING ON EARTHQUAKE INSURANCE RATE INCREASES IN THE STATE OF OKLAHOMA

Notice of Hearing Re Earthquake Insurance in the State of Oklahoma

---

2004 STATE BOARD FOR PROPERTY AND CASUALTY RATES HEARING ON WORKERS' COMPENSATION LOSS COSTS

In the matter of the Workers' Compensation Loss Cost Filing By the National Council on Compensation Insurance; File No. 2004-28280, 04-1041-PRJ, Order and Decision of the Board

SPECIAL MEETING: State Board for Property and Casualty Rates Hearing on Workers' Compensation Loss Costs Scheduled for Thursday, September 23, 2004 at 11:00 a.m.

August 6, 2004 Scheduling Order in the Matter of the Workers' Compensation Loss Costs Filing by the National Council on Compensation Insurance; File No. 04-1041-PRJ.

INSURANCE COMMISSIONER'S HEARING ON MEDICAL MALPRACTICE LIABILITY INSURANCE RATES:

2005

September 26, 2005 Notice of Hearing In the Matter of the Medical Malpractice Professional Liability Rate Filing by Physicians Liability Insurance Company, File No. 05-1541-PRJ.

September 28, 2005 Continuance Order In the Matter of the Medical Malpractice Professional Liability Rate Filing by Physicians Liability Insurance Company; File No. 05-1541-PRJ.

October 3, 2005 Cancellation of Hearing In the Matter of the Medical Malpractice Professional Liability Rate Filing by Physicians Liability Insurance Company; File No. 05-1541-PRJ.

2004

March 26, 2004 Notice of Hearing In the Matter of the Medical Malpractice Professional Liability Rate Filing by The Medical Protective Company; File No. 04-0215-PRJ.

March 18, 2004 Order of Presentation In the Matter of the Medical Malpractice Professional Liability Rate Filing by Medical Protective Company; File No. 04-0215-PRJ.

April 8, 2004 Final Order In the Matter of the Medical Malpractice Professional Liability Rate Filing by Medical Protective Company; File No. 04-0215PRJ.

October 28, 2004 Final Order In the Matter of the Rate Filing by NCMIC Insurance Company; File No. 04-1243-PRJ.

2003

November 21, 2003 Final Order In the Matter of the Medical Malpractice Professional Liability Rate Filing by Physicians Liability Insurance Company; File No. 03-1242PRJ.

November 18, 2003 Notice of Hearing In the Matter of the Medical Malpractice Professional Liability Rate Filing by Physicians Liability Insurance Company; File No. 03-1242 PRJ

November 14, 2003 Order of Presentation In the Matter of the Medical Malpractice Professional Liability Rate Filing by Physicians Liability Insurance Company; File No. 03-1242PRJ.

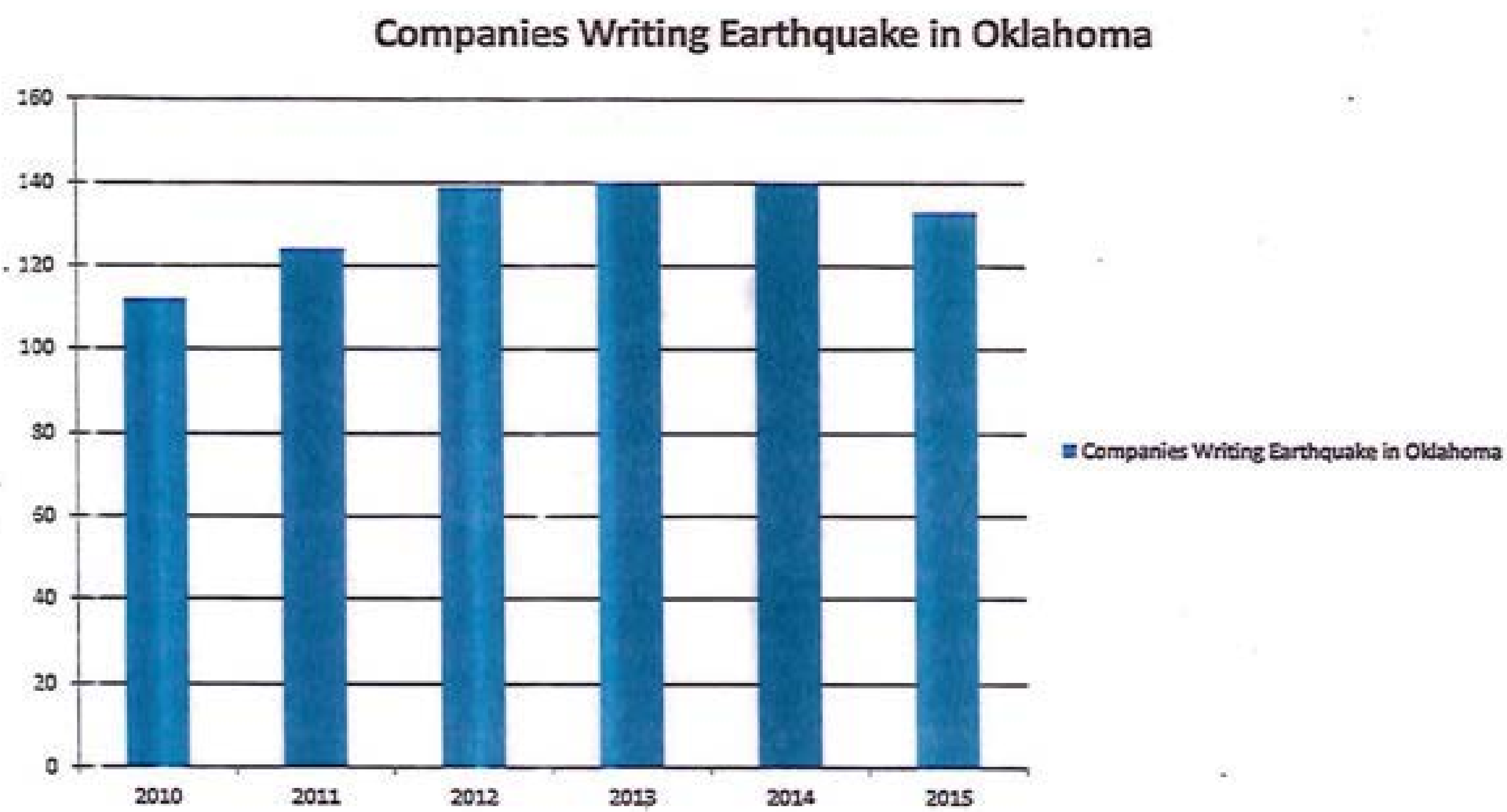
PETITIONER'S EXHIBIT

2

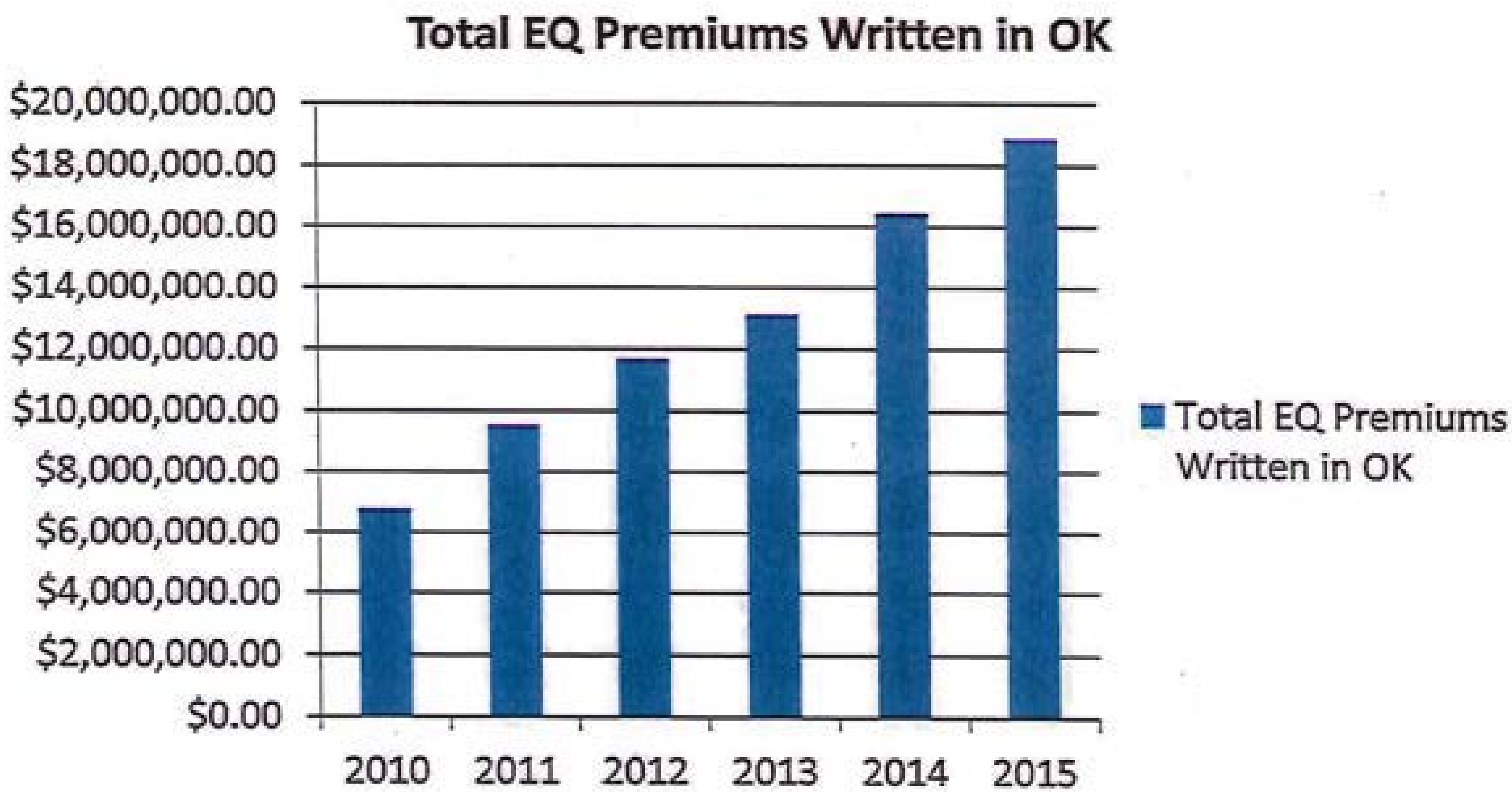
Oklahoma Earthquake Claims and Market Share Premium Data

2010 to Present

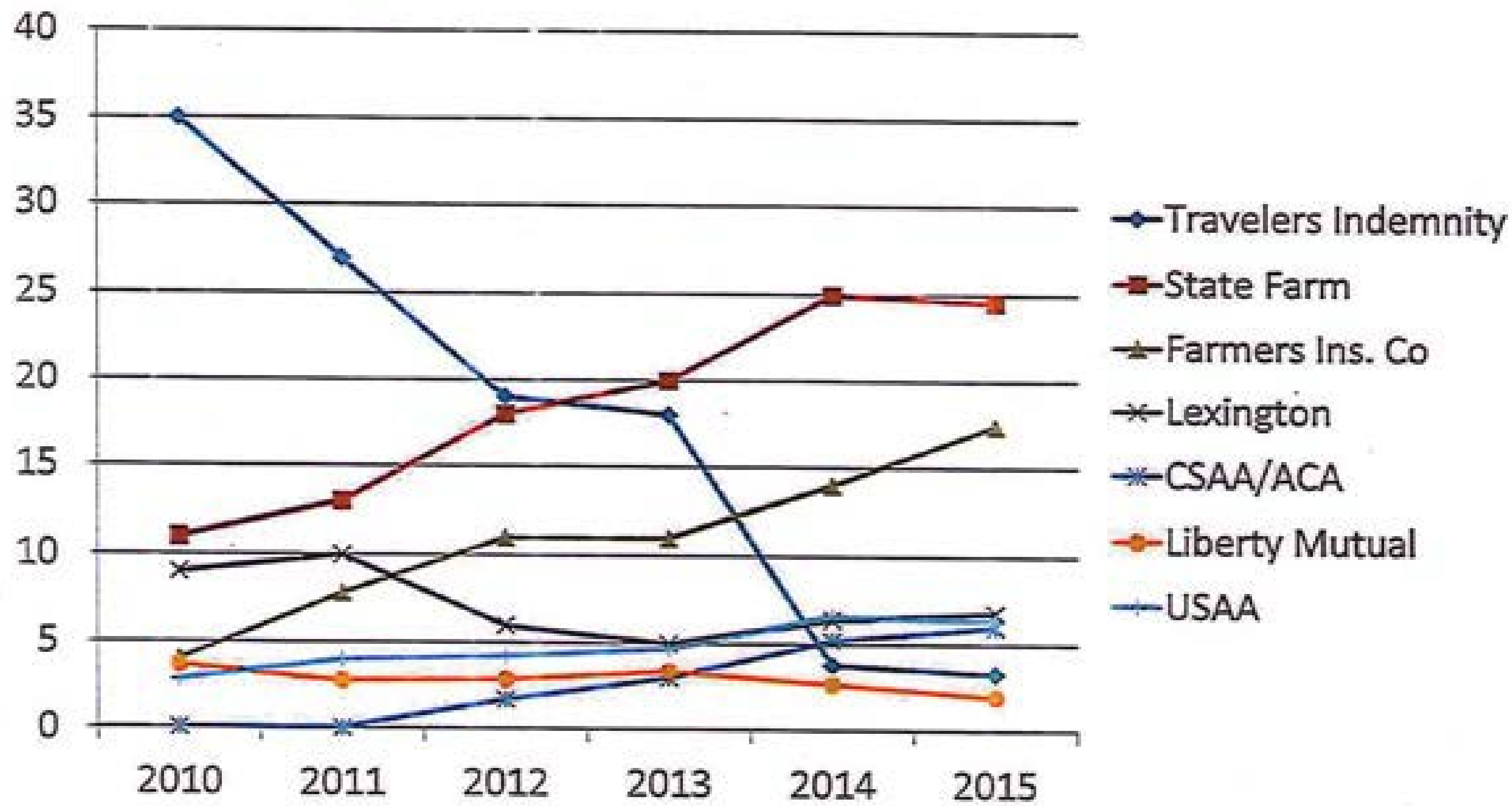
PETITIONER'S EXHIBIT 3


Companies Writing Earthquake in Oklahoma
160
140
120
100
80
60
40
20
0
2010
2011
2012
2013
2014
2015
Companies Writing Earthquake in Oklahoma

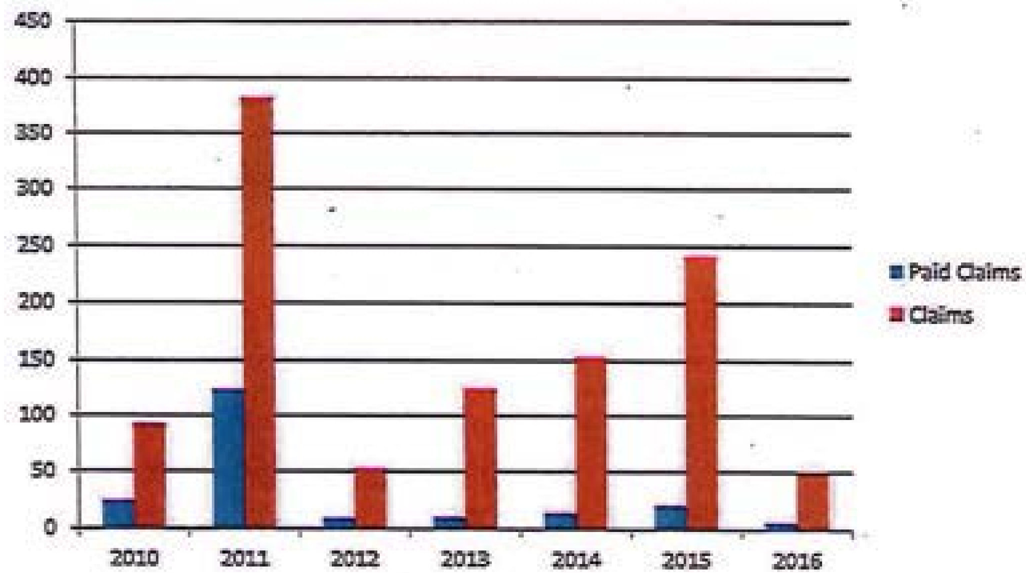
EQ Premiums in OK 2010 to 2015



Consolidation of EQ Premium Market Share into Personal Line Carriers Since 2010



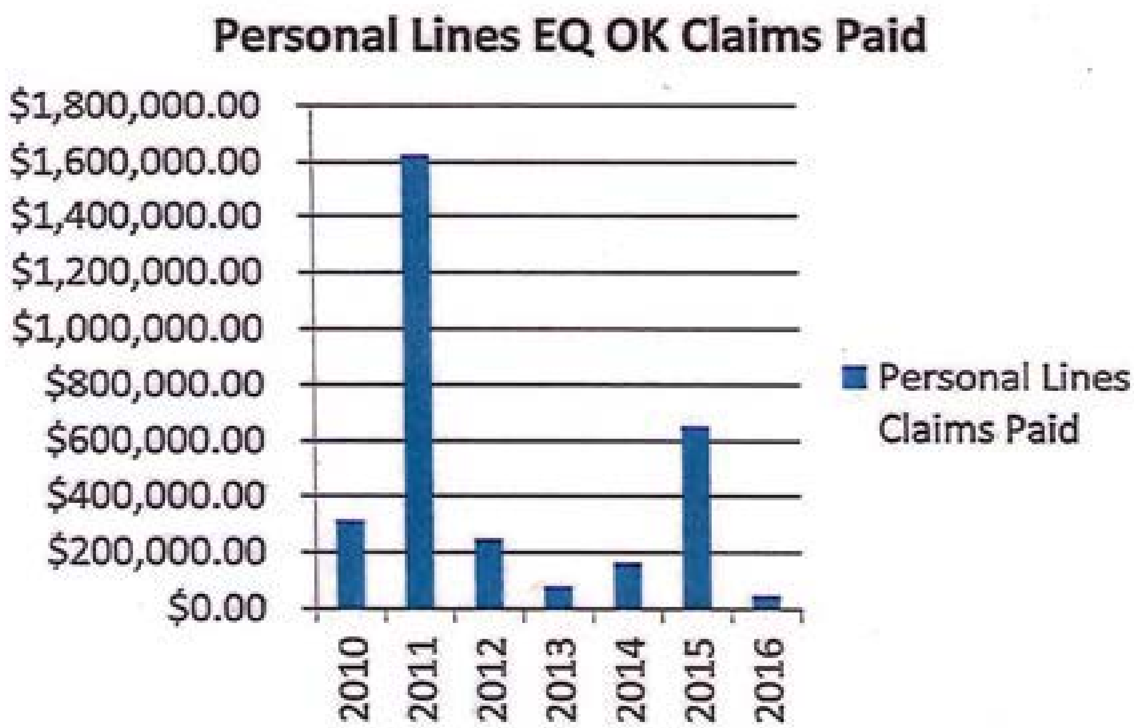
OK Personal Lines Earthquake Claims 2010 to Present



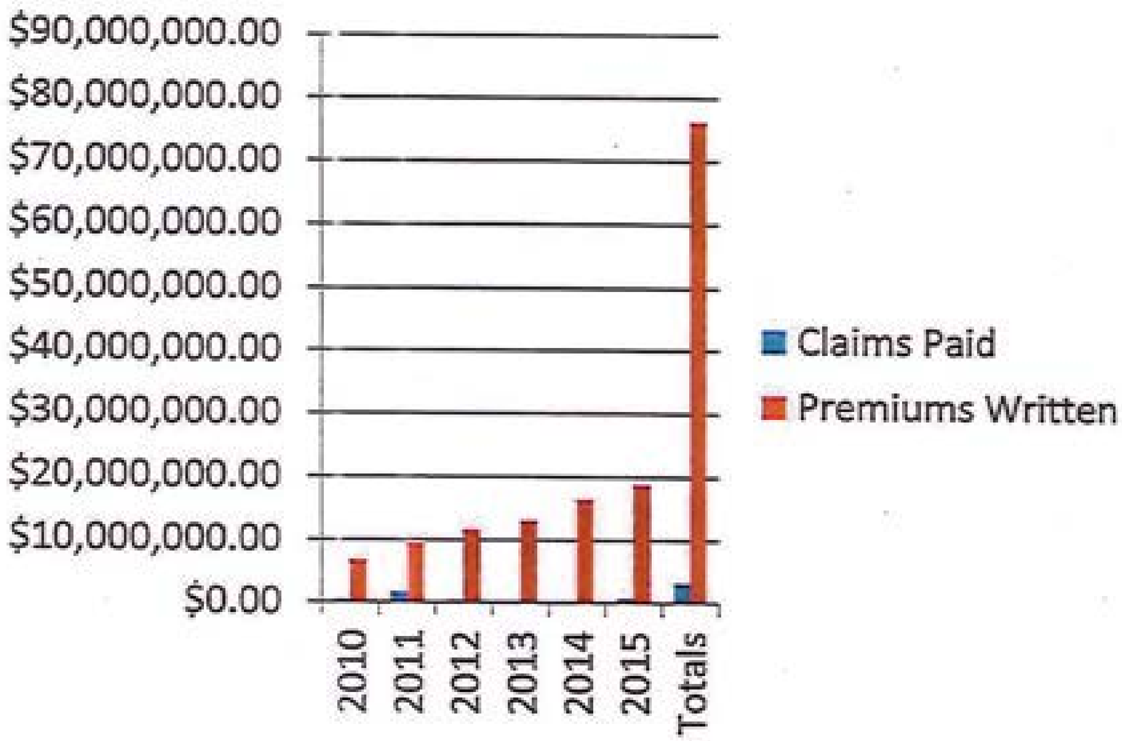
- Out of a total of 1094 claims, only 208 were paid or approximately 19%
- 2011 experienced the most claim activity

Personal Lines Earthquake Claims Paid

- Approximately half of the 208 paid claims resulted in payments of less than $5,000



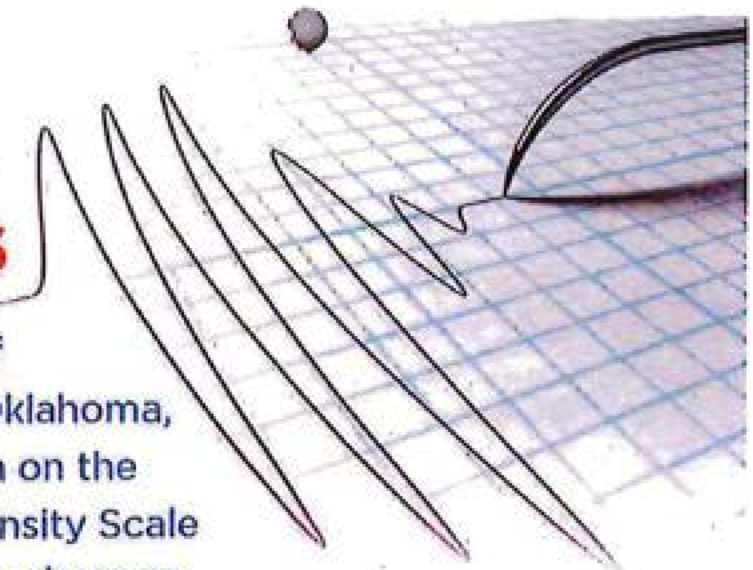
Top 1% of Highest and Lowest Paid claims removed for statistical relevance



Total Claims Paid 2010 to 2015: $3,081,406
Total Premiums Written 2010 to 2015:
$76,373,494

Key Points

- Claim frequency peaked in 2011
- Market concentration has significantly increased into a handful of personal lines Earthquake carriers
- Current Pure Direct Loss Ratio for all Earthquake Carriers in OK since 2010 is approx. 3%
- Premiums written have far exceeded claims paid
- Paid claims have not shown a trend of severity in OK

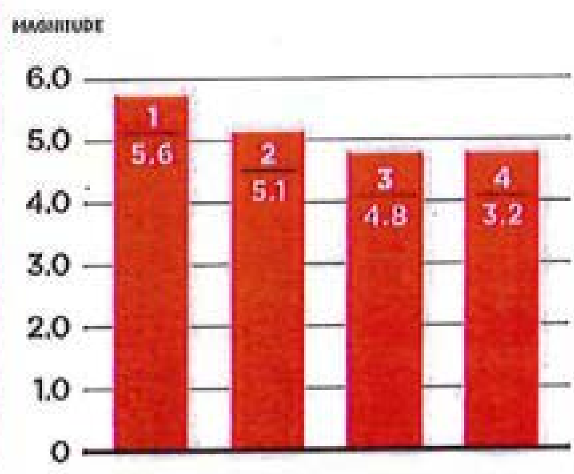


OKLAHOMA EARTHQUAKES

While there are hundreds of earthquakes every year in Oklahoma, they are rarely large enough on the USGS Modified Mercalli Intensity Scale to cause significant property damage.

Oklahoma has had only 2 earthquakes in the past 5 years above 5.0 magnitude, which is the typical threshold for causing property damage according to USGS Modified Mercalli Intensity Scale.

TOP 4 EARTHQUAKES IN OKLAHOMA; PAST 5 YEARS



Source: USGS

1 **Nov. 6, 2011 | 5.6 magnitude**
2.1 miles SW of Wilzetta

2 **Feb. 13, 2016 | 5.1 magnitude**
19.3 miles NW of Fairview

3 **Nov. 5, 2011 | 4.8 magnitude**
1.6 miles W of Wilzetta

4 **Nov. 8, 2011 | 3.2 magnitude**
3.2 miles SW of Wilzetta

continued on back

EXHIBIT
4

PCI
Property Casualty Insurers Association of America
Advocacy. Leadership. Results.

Follow us on Twitter | Like us on Facebook | Visit us at www.pciaa.net

HOW DO YOU MEASURE THE INTENSITY OF EARTHQUAKES?

The table on the right gives intensities that are typically observed at locations near the epicenter of earthquakes of different magnitudes.

MAGNITUDE	TYPICAL MAXIMUM MODIFIED MERCALLI INTENSITY
1.0 — 3.0	I
3.0 — 3.9	II — III
4.0 — 4.9	IV — V
5.0 — 5.9	VI — VII
6.0 — 6.9	VII — IX
7.0 and higher	VIII or higher

Abbreviated Modified Mercalli Intensity Scale

I. Not felt except by a very few under especially favorable conditions.

II. Felt only by a few persons at rest, especially on upper floors of buildings.

III. Felt quite noticeably by persons indoors, especially on upper floors of buildings. Many people do not recognize it as an earthquake. Standing motor cars may rock slightly. Vibrations similar to the passing of a truck. Duration estimated.

IV. Felt indoors by many, outdoors by few during the day. At night, some awakened. Dishes, windows, doors disturbed; walls make cracking sound. Sensation like heavy truck striking building. Standing motor cars rocked noticeably.

V. Felt by nearly everyone; many awakened. Some dishes, windows broken. Unstable objects overturned. Pendulum clocks may stop.

VI. Felt by all, many frightened. Some heavy furniture moved; a few instances of fallen plaster. Damage slight.

VII. Damage negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable damage in poorly built or badly designed structures; some chimneys broken.

VIII. Damage slight in specially designed structures; considerable damage in ordinary substantial buildings with partial collapse. Damage great in poorly built structures. Fall of chimneys, factory stacks, columns, monuments, walls. Heavy furniture overturned.

IX. Damage considerable in specially designed structures; well-designed frame structures thrown out of plumb. Damage great in substantial buildings, with partial collapse. Buildings shifted off foundations.

X. Some well-built wooden structures destroyed; most masonry and frame structures destroyed with foundations. Rails bent.

XI. Few, if any (masonry) structures remain standing. Bridges destroyed. Rails bent greatly.

XII. Damage total. Lines of sight and level are distorted. Objects thrown into the air.

Source: United States Geological Survey's (USGS) Earthquake Hazards Program

BEFORE THE INSURANCE COMMISSIONER OF THE
STATE OF OKLAHOMA

FILED

JUN 06 2016

INSURANCE COMMISSIONER

STATE OF OKLAHOMA, ex rel. JOHN D. DOAK, Insurance Commissioner,	)	
To	)	Case No. 16-0391-TRN
All Licensed Property and Casualty Insurers Offering Earthquake Insurance in the State of Oklahoma, Advisory Organizations	)	

ORDER IN RE: EARTHQUAKE INSURANCE RATES

JURISDICTION

1. John D. Doak is the Insurance Commissioner of the State of Oklahoma and as such is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O. S. §§ 101- 7301.

2. Effected by this Order are licensed insurers ("insurers") offering earthquake insurance covering property located in the State of Oklahoma.

3. The Insurance Commissioner is responsible for enforcing the provisions of the Insurance Code.

4. The Competitive Loss Cost Rating Act (36 O.S. §§ 981-999) ("Rating Act") regulates the filing and use of earthquake insurance rates the State of Oklahoma.

5. In a competitive market, as defined in § 982 of the Rating Act, insurers are permitted to use insurance rates as long as such rates and supplementary rate information are filed with the Commissioner within thirty (30) days following the effective date of the filing.

EXHIBIT
5

6. A competitive market is presumed to exist for a line of insurance unless the Commissioner, after a hearing, issues an order stating that a reasonable degree of competition does not exist in the market.

7. On April 19, 2016, notice was given to all property and casualty insurers and advisory organizations of a hearing pursuant to 36 O.S. § 984 (A) would be held at the Oklahoma Insurance Department, 3624 N.W. 56th St., Ste. 100, Oklahoma City, OK 73112, at 8:00 a.m. on May 24, 2016.

8. On May 24, 2016, at 8:00 a.m., hearing was convened by the Commissioner at the Oklahoma Insurance Department, 3624 N.W. 56th St., Ste. 100, Oklahoma City, OK 73112, at 8:00 a.m. to determine whether the rates for earthquake insurance in Oklahoma were not competitive.

FINDINGS OF FACT

1. Oklahomans have experienced a high volume of earthquakes 2013, 2014 and 2015.

2. The Commissioner has received many inquiries and statements of concern from the public regarding the cost v. benefit of earthquake insurance.

3. In early 2016, the United States Geological Society released a map that purports to show an increased risk of earthquake damage in central and north central Oklahoma.

4. The Commissioner has recently received several filings by insurers seeking to increase the cost and decrease the availability of earthquake coverage.

5. Insurers making such filings have not substantiated their need for increased rates based on objective criteria, such as adverse experience, increased acquisition expense or cost of reinsurance thereby raising the distinct possibly that such rates are excessive.

6. The number of insurers writing earthquake coverage is 119.

7. The majority of earthquake insurance is written as an endorsement to homeowners insurance policies.

8. The market share of the four largest writers of earthquake insurance carriers has exceeded 50% at all times over the six years preceding December 31, 2015.

9. The concentration of the market and the reticence of consumers to lose "package discounts" constitutes an economic barrier that could prevent new firms from entering the market.

10. The long-term profitability for insurers in the market is evidenced by an average loss ratio over the six years preceding December 31, 2015 of approximately 3% is unreasonable.

11. The relationship of insurers' costs to revenue over the six years preceding December 31, 2015 demonstrates that current rates appear to be excessive.

ORDER

IT IS THEREFORE ORDERED that based upon the forgoing findings, a reasonable degree of competition does not exist in the market for earthquake insurance, and such insurance is designated as a noncompetitive line of insurance.

WITNESS My Hand and Official Seal this 6th day of June, 2016.

John D. Doak

JOHN D. DOAK
INSURANCE COMMISSIONER
STATE OF OKLAHOMA

CERTIFICATE OF MAILING

I, John D. Doak, hereby certify that a true and correct copy of the above and foregoing Order was mailed by electronic mail, on this 6th day of June 2016, to:

All licensed property and casualty insurers issuing earthquake insurance in the State of Oklahoma.

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984
AS TO WHETHER THE OKLAHOMA HOMEOWNERS
INSURANCE MARKET IS NONCOMPETITIVE

CASE NO. 26-0820-TRN

EXHIBIT H

Transcript of Pre-Hearing Conference held September 4, 2026
(Case No. 26-0820-TRN)

BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO)
36 O.S. SECTION 984 AS)
TO WHETHER THE OKLAHOMA) No. 26-0820-TRN
HOMEOWNERS INSURANCE)
MARKET IS NONCOMPETITIVE)

PRE-HEARING CONFERENCE

BEFORE HONORABLE JUDGE JOHN D. MILLER

On September 4, 2026, beginning at 9:05 a.m.

Via Teams

Becky Steinkamp, CSR, RPR
Court Reporter
Professional Reporters
511 Couch Drive, Suite 100
Oklahoma City, Oklahoma 73102
(405) 272-1006

Word Index
Topics
Dates
Entities
Phrases
Exhibits

APPEARANCES

Hearing Examiner for the matter of the Hearing Pursuant to 36 O.S. Section 984 as to Whether the Oklahoma Homeowners Insurance Market is Noncompetitive, No. 26-0820-TRN

Honorable Judge John D. Miller
c/o Sherry Standerfer
OKLAHOMA INSURANCE DEPARTMENT
Legal Division
400 NE 50th Street
Oklahoma City, Oklahoma 73105
(405) 521-2828
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Appearing on behalf of the State of Oklahoma, ex rel. Gentner Drummond, Attorney General

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Craig MacIntyre, Observer
Paul Martin, NAMIC
Walter Gonzales, APCIA
Denise Johnson, Observer
Chelsea Stallings, NAMIC
Ryan Kilpatrick, APCIA
Joanna Coll, APCIA
Jerrell Harris, Observer

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PROCEEDINGS

THE COURT: Good morning, everybody morning.

UNIDENTIFIED SPEAKER: Good morning.

THE COURT: Everybody hear me? Anybody not hear me?

UNIDENTIFIED SPEAKER: Good morning.

THE COURT: Okay.

All right. We've got some matters to address this morning. I just want to first of all make sure that I've got a list of those -- let's see.

We've got for the Oklahoma Insurance Department Mr. DeBose and Ms. Nash. You're present; is that correct?

MR. DeBOSE: Yes, sir, Judge.

THE COURT: Ms. Steinkamp, court reporter, present. Welcome.

Mr. Blake Shelton -- I mean, Blake Patton. Excuse me. You are appearing on behalf of counsel for American Property Casualty Insurance Association and National Association of Mutual Insurance Companies, Inc.? Is that correct, Mr. Patton?

MR. PATTON: Yes, Your Honor, along with myself and Mr. Caleb Evans and Jason Seay, and we

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have some client representatives on as well.

THE COURT: Right. Would that be Ms. Stallings and Mr. Gonzales?

MR. PATTON: And Mr. Martin as well, I believe.

THE COURT: Is there a Mr. Martin online?

MR. MARTIN: Good morning, Judge. I'm here.

THE COURT: Okay. All right. And then, let's see.

Good morning, Mr. MacIntyre. How are you, sir?

MR. MacINTYRE: Good morning, Judge. I'm going great. How about you?

THE COURT: Great. I'm doing well. Thank you.

Okay. Let's see.

Good morning, Mr. Hunter. How are you, sir?

MR. HUNTER: Hey, Judge. Good morning.

THE COURT: All right. And then, let's see. We've got Mr. Cameron Capps and Kristin Siegel on behalf of the AG's office; is that correct?

MR. CAPPS: That's correct.

THE COURT: And then we've got, in regards

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to the Whitten Burrage firm, we have -- who's appearing for Whitten Burrage this morning?

MR. WHITTEN: Good morning, Judge. Reggie Whitten, Michael Burrage, and Hannah Whitten, and we're here on behalf of the Oklahoma Attorney General, as well, with --

THE COURT: Right.

MR. WHITTEN: -- Mr. Capps and Ms. Siegel.

THE COURT: Mr. Siegel. Okay.

MS. STANDERFER: Is Mr. Denny on? He was on last time.

THE COURT: Is Mr. Denny on this call also? He was previously.

Mr. Whitten, you said that yourself, Hannah Whitten, and Mr. Burrage are --

MR. WHITTEN: Yes, sir.

THE COURT: -- on behalf of the AG; is that correct? Okay.

MR. WHITTEN: Me, Reggie Whitten, Mike Burrage, Hannah Whitten, Cameron Capps, and Kristin Siegel all for the AG. Thank you.

THE COURT: I think we've got that. Thank you.

All right. I had previously had an appearance from a Dr. Robert Hartwig.

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MR. PATTON: Judge, he is an expert associated with the American Property Casualty Insurance.

THE COURT: Okay. All right. So he's -- okay. He's not -- is he an attorney?

MR. PATTON: No, sir. He's --

THE COURT: Okay.

MR. PATTON: -- a professor --

THE COURT: Okay. All right.

Okay. Anybody I haven't --

MS. STANDERFER: You've got Brett and Mr. MacIntyre.

THE COURT: And Mr. Robinson is present here.

MS. STANDERFER: And Mr. MacIntyre, I believe.

THE COURT: Yes, Mr. MacIntyre, I've addressed him.

MS. STANDERFER: Okay.

MR. MacINTYRE: Yep. I am here.

THE COURT: Anybody else that I've not addressed that is present as a part of this Teams call pretrial conference?

MR. WHITTEN: Judge, we saw some other names up there earlier, but we can't get everybody

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on our gallery view. It doesn't -- our screen --
THE COURT: Right.
MR. WHITTEN: -- isn't big enough.
I think there was some other faces --
THE COURT: I see a Denise Johnson.
MS. STANDERFER: I think she's just here to --
THE COURT: Observe?
MS. STANDERFER: Yeah. She's --
THE COURT: Okay. Just observance?
MS. JOHNSON: Yep.
THE COURT: Okay. Thank you.
MS. COLL: Good morning, sir --
MR. WHITTEN: Yeah, Judge --
THE COURT: Good morning.
MR. WHITTEN: 0for the record -- oh, I'm sorry.
THE COURT: Yes, sir.
MS. COLL: I'm so sorry. Just an observer, Joanna Coll, from APCIA. Just observing.
THE COURT: Okay. Thank you.
MR. KILPATRICK: And same for me, Judge. Ryan Kilpatrick on behalf of APCIA, just observing.
THE COURT: Okay. Thank you.
MR. WHITTEN: Judge, this is Reggie

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Whitten. We were just going to say, for the record, if anybody is observing who has not announced their name and who they are observing on behalf of, we would like to just have that on the record, as well, please.

THE COURT: Absolutely.

All right. Anybody else that's not announced their presence that's just an observer?

(No response)

All right. Hearing none.

All right. Let's do a formal entry.

Comes out of this 4th day September 2026, the matter of Case Number 26-0820-TRN, in reference to Hearing pursuant to 36 Oklahoma Statute Section 984 as to whether the Oklahoma homeowners insurance market is noncompetitive.

This matter has previously been set for pretrial last week, was continued due to filings that have been made in order to give parties opportunity to review those and respond to those. Those responses have been made and are a part of the record of the Oklahoma Insurance Department file.

Having read those, I will state starting out that I have received -- I saw this morning a motion that had been filed last -- yesterday

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afternoon on behalf of the OID that was addressing a Motion to Dismiss Parties Due to a Lack of Standing. I have received that, and that is in regards to whether or not Mr. Sullivan and Mr. MacIntyre have standing as a party to this action.

With the lateness of filing that, what I'm going to do -- Mr. Hunter, on behalf of Mr. Sullivan and Mr. MacIntyre, with this being a holiday weekend, I'm going to ask that any response to that be filed with the Department by noon next Wednesday, which will be the 9th.

And then, upon receipt of those, I will issue a ruling that same day in regards to those motions -- or that motion. Excuse me. In regards specifically to the Motion to Dismiss. But you can file any response to that, Mr. Hunter, on behalf of Mr. Sullivan, Mr. MacIntyre, and yourself with the Department prior to that.

All right. Any questions in regards to that motion?

MS. NASH: Your Honor?

THE COURT: Uh-huh.

MS. NASH: Could the Department just make a statement for the record, please?

THE COURT: Is it in addition to, or does

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it include what your motion --

MS. NASH: It's in addition to.

THE COURT: Okay. All right.

MS. NASH: We would just like to apologize for the late hour filing. We certainly did not mean to appear in any way unprofessional or like we're ambushing. We asked in the motion that it not be considered today and be set for --

THE COURT: Oh, is that right?

MS. NASH: -- another time. We just wanted to ensure that it was before the Court because we thought it might impact the timing decisions that were made today.

THE COURT: Sure.

MS. NASH: But we regret -- I want to take personal ownership. I should have called Mr. Hunter as a professional courtesy, and I want on the record that I apologize for not doing so.

THE COURT: Okay. Thank you.

MR. WHITTEN: Your Honor, this is Reggie Whitten. May I expand, make an inquiry about one thing?

THE COURT: Is it related to that motion?

MR. WHITTEN: It is. I just have a question.

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THE COURT: Okay.

MR. WHITTEN: We are fine with that procedure, of course, but my question is: Will we have an opportunity to have oral argument on their motion? This is such a critically important issue because it may affect us taking issue with other parties.

I don't want to argue the motion now, obviously, but there are --

THE COURT: Yeah. Sure.

MR. WHITTEN: -- parties now who are on this call that we have not objected to, but they're not insureds. They don't own -- they're not paying for homeowners insurance either. Some of these trade associations, if there's a problem with standing for Mr. Sullivan, on behalf of the attorney general, we could advocate that there are problems with other parties. And so we do think oral argument would be very helpful on this issue.

THE COURT: Okay.

MR. ROBINSON: Your Honor, if I may.

THE COURT: Yes. Go ahead, Mr. Robinson.

MR. ROBINSON: I don't know if they can hear me online, but I would also -- along those same lines, would there be an opportunity to reply to any

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responses by Mr. Sullivan or Mr. MacIntyre?

THE COURT: Yeah. We're -- our time docket -- and I'm not -- you know, I'm not particularly wanting to move the date or time of the actual hearing itself, but I want to make sure it's conducted in a fair and impartial way, and any motions, or whatever, are appropriately dealt with and --

MR. ROBINSON: I think now is as good a time as any, as well, but I'd like to offer a motion for a continuance of the September 14th hearing.

THE COURT: Okay.

MR. ROBINSON: I think that with all the things considered -- potential witnesses, trading witnesses, all the things that are set out in the order, as far as Motions in Limine, and such, and all these legal issues that have now been raised in the responses of NAMIC and APCIA and the Department, that I think it would probably serve the public interest to move this hearing to a later date.

THE COURT: Any response from the Department with regards to that?

MR. DeBOSE: The Department has no objection to any motions for a continuance. We understand the concerns and the constrained

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timeline. I mean, we've got a lot of issues here still posed, and it looks like Monday after next we're set to go to hearing, so we understand a motion.

THE COURT: All right.

Mr. Whitten, on behalf -- go ahead.

MR. WHITTEN: Yes, sir. Thank you, sir.

On behalf of the Attorney General, just for the record, this is a matter of critical public interest. It's incredibly important.

We've been preparing for months. We have the four out-of-state expert witnesses that have set their schedule, and one of them cannot physically travel here. That's why we asked for him to appear -- it's Robert Hunter, for him to appear by Zoom.

We've got so much work put into this, and we would strenuously object to moving. There's no reason we can't argue all of these motions easily before the 14th, and, I mean, we're ready to go.

THE COURT: Okay.

Let's see.

MR. ROBINSON: We don't even know who those witnesses are, Your Honor.

THE COURT: Right. They haven't been

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disclosed as part of this pretrial hearing.

MR. WHITTEN: Yes. We're ready to disclose. We just -- the only thing we argue is we simultaneously disclose them. And we're the only party that's disclosed one witness.

THE COURT: Okay.

MR. HUNTER: Judge, may I be heard briefly?

THE COURT: Yes, sir. You may proceed.

MR. HUNTER: So this motion really throws a wrench in the machinery with regard to how we proceed, in my opinion. There's advocacy for a separation of time between parties in between positions. And I don't want to be too melodramatic here, but removing two parties from this hearing at this late date is important to the consideration of how time is allocated.

As far as I'm concerned, this motion is frivolous. The cases that are cited apply to the ability to participate in an appeal, not to participate in a hearing or trial below.

So with regard to a continuance, I also object to that, and I'd, frankly, like to argue this motion today.

THE COURT: Okay. Thank you for your

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position.

MR. HUNTER: Thank you, Judge.

THE COURT: Uh-huh.

MR. PATTON: Judge, if I may, this is Blake Patton on behalf of NAMIC and APCIA. Just for the record, I'd like to note our forceful, full-throated objection to any merits -- continuation of the merits hearing. These are all issues that we believe can be resolved in advance of the hearing. As noted in our papers, we believe this to be more of a rule-making proceeding as opposed --

THE COURT: Right.

MR. PATTON: -- to an individual proceeding under the APA.

Under that framework, we believe this Court is more than able to address these issues, appear, hear testimony on the Section 984 factors, make a decision, and the parties can do what they will with that decision, but we don't think there's any reason or need for a continuance of the merits hearing.

THE COURT: Okay. Thank you, sir.

All right. Anybody else wish to address that?

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MR. WHITTEN: On behalf of the Attorney General, we would be pleased to argue all these motions today. We think they could be argued today.

But, again, going back to the objection to Bob Sullivan. If Bob Sullivan doesn't have standing, then we want to file a motion. Some of these trade associations don't have standing either.

So I -- we had no objection to anybody participating in this. You know, both sides are definitely going to have to make a complete and fair record just in case someone does appeal.

THE COURT: Sure. Well, I anticipate it will be appealed, whatever the decision is.

MR. WHITTEN: Yeah. Well, it's just so hard to put the genie back in the bottle. It would be better to let everybody conduct the hearing, say what they want to say, call the witnesses they want to say.

And then, you know, if there is an appeal, that could all be sorted out later, but to cut parties out on the front end destroys every -- I mean, it puts a reversible error in this thing from the very beginning.

So we're prepared to argue all these motions today if the Court wants to. Or set them --

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we'll bend our schedule if you want to set them after we all agree. That's fine too, Your Honor. Whatever you want to do.

THE COURT: Okay. All right. Thank you. Any further response?

(No response)

THE COURT: Okay. I'm going to take -- we're going to be in recess for about five minutes here, and then I'll come back and issue a decision.

(Short recess from 9:21 to 9:34 a.m.)

THE COURT: All right. After a short recess, based on the Motion to Continue that's been offered the morning and taken into account, the Motion to Dismiss based on standing of Mr. Sullivan and Mr. MacIntyre, this hearing is entered. In pursuant of a fair and impartial hearing in regards to all these matters, I'm going to issue the following rulings:

I'm going to order that any objections to the standing argument filed by the Department be filed in writing by 5:00 next Wednesday -- excuse me. By 5:00 Thursday, the 10th. If there should be any response to that, it would need to be filed with the Department by noon on Monday the 14th. The Motion to Continue is going to be granted.

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The Court is going to continue oral argument on the Motion to Dismiss for 10:00 a.m., via Teams, on Tuesday, September 15th, and that motion -- oral motion will be heard. Additionally, the Court will proceed to conduct its pretrial in regards to this matter.

After the oral argument on the motions, then I will rule on other motions pending by the parties, which will constitute another pretrial date for the 15th at 10:00 a.m., via Teams. And I will advise the parties, as far as resetting the hearing date, that's going to take consultation with the Capitol people.

And as far as me as the hearing examiner, I'm not looking to limit this hearing to one or two days. If it takes a whole week for relevant evidence to be presented, I'm open to that. So I don't see the need -- which will be addressed in the pretrial in regards to setting time limits and things, any relevant evidence or argument, or whatever, I'm willing to consider in making my decision.

We're roughly looking at the week of October 19th, and I'm asking to see if the whole week is available. I hope it doesn't take that

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long, but if it does, then that's what it's going to be. But I should know next Tuesday when we conduct our 10:00 oral argument on the Motion to Dismiss and the pretrial that should have a new date, time, and location secured.

All right. Noted to the objections of the parties that have expressed their objection to the continuance, that will be noted as a part of the record.

MR. HUNTER: Judge, Mike Hunter here. I will be out of the country on October 19th. Just FYI.

THE COURT: Okay. All right. Mr. Hunter, that -- when will you be back, sir?

MR. HUNTER: I believe that I'm back and hopefully will have my sea legs by the 25th, Your Honor.

THE COURT: Okay.

MR. WHITTEN: Your Honor, Reggie Whitten here. May I ask a question about scheduling?

THE COURT: Yes, sir, you may.

MR. WHITTEN: It's along the same lines as what Mr. Hunter just said. Mr. Burrage and I are set for two trials on the same day --

THE COURT: Yes, sir. Okay.

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MR. WHITTEN: -- in Lawton, and that is November 2. So, for us, we certainly don't want this to push any further --

THE COURT: Sure.

MR. WHITTEN: -- than October because -- I mean, we can't try --

THE COURT: Yes, sir.

MR. WHITTEN: -- two cases at the same time --

THE COURT: Absolutely.

MR. WHITTEN: -- but we will try one of them, I'm pretty sure.

THE COURT: Yeah. Well --

MR. WHITTEN: So we'd love to get it over with in October, if that's possible.

THE COURT: Yes, sir. I'm all in favor of that also, and with Mr. Hunter's conflict and you having a trial the next week, would anybody have a known conflict, provided we can coordinate a room, October 20 -- the week of October 26th? Does anybody have a known conflict that week?

MR. WHITTEN: We'll make it work here.

MR. PATTON: Judge, it works for us. We'll confer with our witness, but that works for us.

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THE COURT: Okay. All right. And I'm willing -- I understand with witnesses' situations, sometimes -- I mean, you don't know at this point in time, and I'm willing, if there is a major conflict, or whatever, to do everything we can to make sure that that gets included in the record, so that's not a problem.

And, like I say, in regards -- we'll be addressing this next week in detail on the 15th in regards to time limits and stuff, but I'm more of the school, if it's relevant, or whatever, I'm not looking to -- I may set some time limits in regards to any opening or closing statements, but in regards to presentation of evidence that's deemed to be relevant to the issues, then I'm not -- however long it takes, I'm willing to listen, so...

MR. PATTON: Yes, sir. Thank you.

MS. NASH: Your Honor?

THE COURT: Yes.

MS. NASH: I have some information on the Commissioner's travel schedule.

THE COURT: Okay.

MS. NASH: The best week of availability for him, if possible for the other parties, would be the week of October 12th through 16th. Is there any

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way to make that timing work?

THE COURT: Well, the only thing with that week is -- I don't think it's a State holiday, but it's Columbus Day and Indigenes People's Day, and it's Thanksgiving in Canada. So I don't want -- if anybody celebrates that date, I'm not necessarily wanting to deprive you of that holiday, but --

MR. ROBINSON: Your Honor, I'm gone most of that week in a client meeting.

THE COURT: Okay.

MR. HUNTER: Your Honor, that's the front end of my time out of the country, so I apologize --

THE COURT: Okay. All right.

MR. HUNTER: -- for not being flexible.

THE COURT: No, no. Congratulations. No need to apologize.

MR. HUNTER: Thank you.

THE COURT: So, Ms. Nash, will you again state -- tell me again the conflict that week?

MS. NASH: I believe the Commissioner is traveling for a conference.

THE COURT: So as far as the Department, or whatever, he's designated, I assume, you, as counsel, to act on behalf of the Department, or whatever. Were you anticipating him to be present

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for the hearing? Is that his desire?

MS. NASH: Yes. And we are anticipating that he may be a witness.

THE COURT: Well, that -- that's important. Okay. So what part of that week is he definitely unavailable?

MS. NASH: The whole week. But we can push to see if we can get some travel arrangements changed.

MR. WHITTEN: Your Honor, may I inquire?

THE COURT: Sure.

MR. WHITTEN: I mean, there's so many moving parts to this --

THE COURT: Absolutely.

MR. WHITTEN: -- and so many witnesses. I mean, it's pretty feasible today -- we do it all the time -- to take a video deposition of one person that's the hang up that can't be there. So it would be real easy to put him on videotape deposition, and then they can play it at trial. I hate to hold the whole thing up.

You know, we had this set for two days, so -- on behalf of the AG, I think we could say Monday, October 12th, Tuesday the 13th, Wednesday the 14th, those are three really good days for us.

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Surely we could finish this then. If the Commissioner wants to testify, he can give video deposition before then. That would be easy to do.

Just like if one of my witnesses couldn't be there, I could always, with the permission of the Court, of course, take his video deposition.

THE COURT: Sure.

MR. WHITTEN: That wouldn't hang it up. I mean, there's so many witnesses involved here, it's almost --

THE COURT: I understand it's a -- it's a -- right. All right.

MR. DeBOSE: Judge, as regards to the potential Commissioner's testimony --

THE COURT: Right.

MR. DeBOSE: -- I definitely understand where opposing counsel is coming from regarding the deposition option; however, I think -- it seems like -- and I don't mean to get into the issue, but it seems like we are all in agreement on allowing some witnesses to testify remotely, so if that is an option we can work out with the Commissioner, we would be open to that. That might be more convenient to us and the parties when it comes to direct and cross-examination.

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THE COURT: And are you referring to the availability for the week of the 26th through the 28th?

MR. DeBOSE: Yes, sir.

THE COURT: Okay. So provided -- okay.

MR. WHITTEN: Well, we agree with Bo that testimony should be able to be given remotely. I share those thoughts. That would be helpful.

THE COURT: That's going to be a part of our pretrial, and that testimony will be -- I'll just tell you, it's going to be allowed. In this day and time, that's part of the motion that we'll specifically address, but for your knowledge, there is no problem with testimony in that capacity, in that manner.

MR. WHITTEN: Judge, can I also inquire? That's very helpful what you just said for us planning. So, as of today, the only motions in our omnibus brief that are disputed are 2, 3, 5, 9, and 11. Would the Court like to -- I think you just resolved one of them, but would the Court like today to hear argument and maybe consider ruling on 2, 3, 5, 9, and 11 so we can get something done while we're all here?

THE COURT: Well, let me address the

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projected date of the hearing first before we do anything further.

In regards to -- based on what has been disclosed, our target date is going to be the week of the 26th of October. And Mr. Whitten, you have, on behalf of the AG's office, felt like you're comfortable that within three full days, we can have all -- if they're full days, that we can accomplish and everybody, at least from your perspective, have an opportunity to present whatever testimony and evidence that was needed?

MR. WHITTEN: I think so. Just speaking for the Attorney General alone --

THE COURT: Right.

MR. WHITTEN: -- I think we can put ours on in one day.

THE COURT: Right. Okay.

Well, and Mr. DeBose, Ms. Nash, on behalf of the Department, do you believe, if we set three days aside and it doesn't take all of that, are you confident that would provide sufficient timing for the presentation of anything the Department wishes to present?

MR. DeBOSE: Yes, sir, Judge.

THE COURT: Okay. And assuming in regards

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to -- there's not been any ruling in regards to the standing by Mr. MacIntyre or Mr. Hunter on behalf of Mr. Sullivan, do you believe that three full days would be sufficient to present anything based on what you know at this point?

MR. HUNTER: Yes, Your Honor.

MR. MacINTYRE: Yes, Your Honor.

THE COURT: Thank you, sir.

And, Mr. Robinson, on behalf of who you're representing, do you feel like three full days --

MR. ROBINSON: Yes, sir.

THE COURT: Okay. And then, let's see.

Mr. Patton --

MR. PATTON: Yes, sir. Same answer.

THE COURT: -- from your perspective, do you think three full days should -- will that question be sufficient timing for everything to be presented that needs to be presented for a determination under this matter?

MR. PATTON: Yes, sir.

THE COURT: Okay. All right.

Who have I missed? Okay.

Okay. So we're going to target the 26th through the 28th for the actual hearing on this matter, subject to approval by -- I assume we'll

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still have it at the Capitol, provided they've got facilities available during that time period, and we'll confirm that. She'll be able to confirm that with the person in charge of that, who is on vacation but should be back next week.

All right. Let me see. Pardon me just a moment.

I'm going to reserve my ruling on the motions 2, 3, 5, 9, and 11 until next Tuesday at 10:00 after the hearing on the Motion to Dismiss. In regards to standing, in regards to them too.

Anything -- so to clarify, any objection to that motion on behalf of either Mr. Sullivan, Mr. MacIntyre, or any of the other parties, needs to be in writing, submitted to the Department by 5:00 next Thursday, the 10th, and then any response to that either by the Department or any other party would be filed with the Department by noon on the 14th, and hearing, via Teams, on that motion and further rulings on the motions pending about the trial will be at 10:00 next Tuesday the 15th.

Anything else --

MR. BURRAGE: May I address one thing with regards to scheduling?

THE COURT: Yes.

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MR. WHITTEN: With regard to the conference on the 15th, I think it might be helpful in knowing what to present at the pretrial or what needs to be done. The sooner we could have the names of the witnesses, the better off we would be.

THE COURT: Well --

MR. BURRAGE: You might want to address that on the 15th, but it would be helpful if we had them prior to the pretrial.

THE COURT: Well, let me ask -- is that your Motion Number 3, Mr. Whitten?

MR. WHITTEN: I think that's right, Your Honor. And the way we look at it, we'd give all of our witnesses' names up today if everyone else would give their names up today. All we wanted was a simultaneous exchange.

But Mr. Burrage is right. With the Internet, you can do a lot of research. So we don't have to just sit around on our hands. We can actually be researching witnesses.

And we just -- you know, due process requires everybody to have the same level playing field --

THE COURT: That's right.

MR. WHITTEN: -- and we're okay giving

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names up, like I said, today. We just want to know who their witnesses are.

THE COURT: Sure. Well, I'll --

MR. PATTON: Judge?

THE COURT: Yes.

MR. PATTON: Blake Patton here. Maybe it's sensible just to build in a witness disclosure deadline as part of the, you know, order that will be issued today. That might make sense.

MR. WHITTEN: And the same goes for exhibits. I agree with Blake. I mean, we do need a date. The sooner is better, but, you know, due process requires no surprise.

THE COURT: Sure.

MR. WHITTEN: And we'll give all our exhibits up simultaneously if they give their --

THE COURT: Well, sure. And we've got -- we've got about a month and a half from our pretrial on the 15th, or whatever.

Mr. DeBose, Ms. Nash, on behalf of the Department, there's no doubt that there will be an order of disclosure of the witnesses, or whatever. Do you have those ready to do? Do you want to argue -- do you want to further clarify that on our hearing on the 15th? If everybody is in agreement,

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there's no problem. If not, I'll issue the ruling on the 15th, but what's the Department's position?

MR. DeBOSE: No. We get the position stated. I don't -- we don't have to wait all the way to the 15th to set that date to exchange. It can be set sometime next week or anytime prior to the 15th. We can agree to that, Judge. No problem.

THE COURT: Okay. All right. The order --

MR. PATTON: Judge, my only -- I'm sorry, Judge. My only add on to that is --

THE COURT: Yes, sir.

MR. PATTON: -- I think it might make sense to bifurcate witness and exhibit disclosures.

THE COURT: Right. Sure.

MR. PATTON: I think we're in the process of working with witnesses, so we may have a better picture of exhibits maybe further down the line.

THE COURT: Okay.

Okay. I'm going to order that the witness list be exchanged by any parties to the matter by noon next Monday, the 14th. And then, in regards to any witness exhibits, or whatever, on the pretrial next Tuesday at 10:00, I'll set a deadline for those exhibits to be exchanged.

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MR. PATTON: Yes, sir.

THE COURT: Anything further that anybody -- needs to be raised at this point or any point for clarification?

MR. WHITTEN: No, sir.

MR. BURRAGE: We're good.

MR. WHITTEN: Thank you.

THE COURT: All right. Thank you very much. Hope y'all have a nice Labor Day weekend, and we'll see you next week.

MR. HUNTER: Thank you, Judge.

MR. DeBOSE: Thank you, Judge.

MR. WHITTEN: Bye, everybody.

(HEARING CONCLUDED AT 9:53 A.M.)

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CERTIFICATE

STATE OF OKLAHOMA)
) SS:
COUNTY OF OKLAHOMA)

I, Becky Dame Steinkamp, Certified Shorthand Reporter within and for the State of Oklahoma, do hereby certify that the above and foregoing hearing was by me taken in shorthand and thereafter transcribed; and that I am not an attorney for nor relative of any of said parties or otherwise interested in the event of said action.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 8th day of September, 2026.

Becky Dame Steinkamp, CSR, RPR

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occurrences)

20:25

"I believe that I'm back" (1 occurrences)

21:15

"I'm pretty sure" (1 occurrences)

22:12

"you don't know at this point in time" (1 occurrences)

23:3

"I don't think it's a State holiday" (1 occurrences)

24:3

"I believe the Commissioner is traveling" (1 occurrences)

24:20

"we are anticipating that he may be a witness" (1 occurrences)

25:2

"I think we could say ... three really good days for us." (1 occurrences)

25:23

"I understand" (1 occurrences)

26:11

"it seems like" (2 occurrences)

26:18 26:20

"I don't mean to get into the issue" (1 occurrences)

26:19

"I think so" (1 occurrences)

28:12

"I think we can put ours on in one day" (1 occurrences)

28:15

"I think it might be helpful ... better off we would be." (1 occurrences)

31:2

"I think that's right" (1 occurrences)

31:12

"Maybe it's sensible ... That might make sense." (1 occurrences)

32:6

"I think it might make sense to bifurcate" (1 occurrences)

33:13

"I think we're in the process ... further down the line." (1 occurrences)

33:16

C. Record Mechanics

"for the record, if anybody is observing ... on the record, as well, please." (1 occurrences)

10:1

"make a statement for the record, please?" (1 occurrences)

11:23

"on the record" (1 occurrences)

12:17

"just for the record" (2 occurrences)

15:9 17:6

"we're going to be in recess" (1 occurrences)

19:8

"(Short recess from 9:21 to 9:34 a.m.)" (1 occurrences)

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BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984
AS TO WHETHER THE OKLAHOMA HOMEOWNERS
INSURANCE MARKET IS NONCOMPETITIVE

CASE NO. 26-0820-TRN

EXHIBIT I

Invitation to fundraising reception benefiting Marty Quinn, hosted by Insurance Commissioner Glen Mulready and others (July 23, 2026)

Oklahoma Insurance Commissioner Glen Mulready & Commissioner John Doak (2011-2019)

invite you for a fundraising reception benefiting

MARTY QUINN
INSURANCE COMMISSIONER

Thursday
July 23rd
5:30 pm - 7:30 pm

Regal Room on Britton
420 E. Britton Road
Oklahoma City, OK 73114

Hosts

Angela Ables
Susan & Gregory Bradford
Scott Blubaugh
Charlie Caldwell
Monica & John Collison
Scott Garrison
Carol & Robert Hefner IV

Ryan Leonard
Chris Meredith
Rodd Moesel
Jamey Mullen
Tinker Owens
Nancy & Charlie Potts
Doug Pomplun

Dan Ramsey
Jeramy Rich
Karma & Brett Robinson
Marshall Snipes
Senator John Sparks
Rob & Senator Lisa Standridge
Lisa & Spud Whitman

Hosts at the time of distribution*

Please make checks out to
Friends of Marty Quinn 2026
PO Box 3044, Oklahoma City, OK 73101
or
Donate Online at **martyquinnforok.com**

For more information or to RSVP, contact Karma Robinson at (405) 590-0493 or karma@spadvocacy.com

POLITICAL CONTRIBUTIONS ARE NOT TAX DEDUCTIBLE. STATE LAWS PROHIBITS CONTRIBUTIONS FROM INCORPORATED ENTITIES.
AUTHORIZED AND PAID FOR BY FRIENDS OF MARTY QUINN 2026

BEFORE THE INSURANCE COMMISSIONER OF THE STATE OF OKLAHOMA

IN RE: HEARING PURSUANT TO 36 O.S. § 984 AS TO WHETHER THE OKLAHOMA HOMEOWNERS INSURANCE MARKET IS NONCOMPETITIVE	**CASE NO. 26-0820-TRN**

EXHIBIT J

Facebook post of Glen Mulready (June 16, 2026)

1:43 5G+ 81

Glen Mulready

All Photos Reels

Glen Mulready
Jun 16 ·

I have not put much of anything out there on our election today. If anyone has questions or looking for insight on any candidates, I'm happy to discuss. Give me a call or text.
As I arrived at the polls this morning I ran into a friend who told me he had not voted for Insurance Commissioner because he didn't know any of them. If that's you too, I encourage you to vote for Marty Quinn. He has the most experience

2 9+

1:43 5G+ 80

Glen Mulready

All Photos Reels

didn't know any of them. If that's you too, I encourage you to vote for Marty Quinn. He has the most experience of all the candidates, has served in management (the Insurance Dept has 125 employees), chaired the Senate Insurance Committee so is very familiar with the legislative process AND he is a man with a lot of character and integrity.

156 42 comments

Like Comment Share

Evan M. Tipton ...

2 9+