

**From:** Jerry Flanagan jerry@consumerwatchdog.org  
**Subject:** Re: PRA-2019-00555 (CL) Public Records Act Request  
**Date:** August 1, 2019 at 12:40 PM  
**To:** De Guzman, Debbie Lynne DebbieLynne.DeGuzman@insurance.ca.gov  
**Cc:** Lor, Chao Chao.Lor@insurance.ca.gov



Ms. De Guzman and Ms. Lor,

We are very disappointed and concerned that the Department is delaying production on Request 1 (Conferences) and Request 2 (out-of-state travel) until August 31, 2019. Please explain why the Department proposes another month of delay until any responsive documents are produced. Given that the Public Records Act requires records to be produced promptly, Consumer Watchdog calls on the Department to produce responsive records on an on-going basis as they are identified, including producing all currently identified documents immediately.

In our July 23 letter we called on the Department to make a "clear and unequivocal commitment to provide non-privileged records by July 31, 2019." Ms. De Guzman's email from late yesterday does not provide that commitment. If there are any responsive documents that the Department intends not to produce on the basis of privilege or otherwise, please state so now. It is fundamentally unfair for the Department to propose yet another month delay to produce records and wait until that time to inform Consumer Watchdog that it is withholding documents from production. If the Department intends to withhold documents based on privileged there is no reason to delay meet and confer, and/or court action, to resolve any disputes.

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On Jul 31, 2019, at 6:03 PM, De Guzman, Debbie Lynne  
<DebbieLynne.DeGuzman@insurance.ca.gov> wrote:

Dear Mr. Flanagan,

The California Department of Insurance (the "Department") provides you with responsive records to Requests 3 and 4 of your Public Records Act request dated July 23, 2019.

Enclosed are additional responsive records found relating to Requests 3 and 4. If there are additional responsive records found for these two requests, the Department will make them available to you no later than August 31, 2019.

As requested in your July 23, 2019 letter, please be advised that the Department will produce records in response to Request 1 no later than August 31, 2019.

Thanks in advance for your courtesy and consideration.

Sincerely,

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