

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

ANN GILLESPIE, Illinois Director of
Insurance, in her official capacity,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY
INSURANCE COMPANY, STATE FARM
MUTUAL AUTOMOBILE INSURANCE
COMPANY, STATE FARM GENERAL
INSURANCE COMPANY, and OGLESBY
REINSURANCE COMPANY,

Defendants.

Case No. 2025CH10454

COMPLAINT

Ann Gillespie, in her official capacity as Illinois Director of Insurance (the “Director”), brings this complaint for declaratory and injunctive relief against State Farm Fire and Casualty Insurance Company, State Farm Mutual Automobile Insurance Company, State Farm General Insurance Company, and Oglesby Reinsurance Company to obtain their compliance with a regulatory examination conducted by the Illinois Department of Insurance under Illinois law.

NATURE OF THE ACTION

1. For many Americans, homeownership clears the path to a stable economic future for themselves, their children, and their children’s children. Most Americans own their primary residence, and home equity is the largest asset held by nearly all homeowners, accounting for nearly half of the median homeowner’s wealth. Local governments and school districts also rely on real estate taxes to fund the basic services that *all* Americans, renters or owners, depend on.
2. Yet homeownership also comes with perils. The loss of this primary asset due to catastrophe—hurricane, tornado, wildfire, or other disaster—can permanently alter a family’s

finances, undoing decades of careful saving. And, likewise, a widespread disaster can devastate the finances of local and even state governments.

3. Most homeowners address this risk by purchasing homeowners insurance. But in recent years, many homeowners have found themselves priced out of the market. Even after adjusting for inflation, homeowners insurance premiums have increased nearly 74 percent since the 2007–2009 Great Recession. From 2017 to 2022, homeowners insurance premiums rose 40 percent faster than inflation. As a result, more and more homeowners have been forced to forgo this essential protection.

4. Plaintiff, the Director of the Illinois Department of Insurance (the “Department”), regulates and examines the business records of all insurers doing business in Illinois, including, of course, those domestic companies that have their headquarters in Illinois. The Department has a mission to protect consumers by providing assistance and information, efficiently regulating the insurance industry’s market behavior and financial solvency, and fostering a competitive insurance marketplace.

5. To fulfill that mission, the Director is seeking data from defendants State Farm Fire and Casualty Insurance Company, State Farm Mutual Automobile Insurance Company, State Farm General Insurance Company, and Oglesby Reinsurance Company (collectively, “State Farm”), about the policies they write and the premiums they charge.

6. State Farm is the largest homeowners insurer in the country, and its premiums have been rising rapidly in recent years. In 2024, its written homeowners premiums rose by over 16 percent nationwide, the largest yearly increase since 2002. In July 2025, it implemented a 27 percent rate increase on its millions of policyholders in Illinois. A complete understanding of the affordability crisis in homeowners insurance requires comprehensive data on the financial

condition of State Farm, the market and nonfinancial practices of State Farm, and the enterprise risks faced by State Farm. In order to assess these aspects of State Farm's business, the Director and the Department require complete data from State Farm at the zip-code level as to policies that it writes to insure homes across the country.

7. The Director accordingly initiated an examination of State Farm to obtain those data in November 2024, but State Farm has spurned the examination, flouting its legal obligations under multiple provisions of the Illinois Insurance Code. Specifically, State Farm has (1) refused to produce data available in Illinois on the basis that those data reveal information about policies for homes located outside of Illinois and (2) objected to production of the data based on purported concerns that the Director will violate confidentiality protections found in the very Insurance Code that the Director herself administers.

8. State Farm's refusal to provide data regarding all the policies that it issues has no basis in law. State Farm's obstruction harms the public interest by preventing the Director from learning important information for assessing the challenges that plague this insurance market critically important to Illinoisians and all Americans.

9. The Director accordingly seeks a declaration that State Farm is obliged to facilitate the Director's pending examination of State Farm and an injunction requiring State Farm to produce information about all homeowners insurance policies it issues nationwide.

PARTIES

10. The Director is charged with the rights, powers, and duties appertaining to the enforcement and execution of all the insurance laws of Illinois. *See* 215 ILCS 5/401.

11. Defendant State Farm Fire and Casualty Insurance Company is a domestic insurance company headquartered in Bloomington, Illinois, and is doing business throughout Illinois, including in Cook County.

12. State Farm Fire and Casualty Insurance Company is subject to the administrative and regulatory jurisdiction of the Director. State Farm Fire and Casualty Insurance Company has a certificate of authority to do an insurance business as a domestic stock company under 215 ILCS 5/24. State Farm Fire and Casualty Insurance Company has registered with the director pursuant to 215 ILCS 5/131.13.

13. Defendant State Farm Mutual Automobile Insurance Company is a domestic insurance company headquartered in Bloomington, Illinois, and is doing business throughout Illinois, including in Cook County.

14. State Farm Mutual Automobile Insurance Company is subject to the administrative and regulatory jurisdiction of the Director. State Farm Mutual Automobile Insurance Company has a certificate of authority to transact business as a domestic mutual company under 215 ILCS 5/51. State Farm Mutual Automobile Insurance Company has registered with the director pursuant to 215 ILCS 5/131.13.

15. Defendant State Farm General Insurance Company is a domestic insurance company headquartered in Bloomington, Illinois, and is doing business throughout Illinois, including in Cook County.

16. State Farm General Insurance Company is subject to the administrative and regulatory jurisdiction of the Director. State Farm General Insurance Company has a certificate of authority to do an insurance business as a domestic stock company under 215 ILCS 5/24. State Farm General Insurance Company has registered with the director pursuant to 215 ILCS 5/131.13.

17. Defendant Oglesby Reinsurance Company is a domestic insurance company headquartered in Bloomington, Illinois, and doing business throughout Illinois, including in Cook County.

18. Oglesby Reinsurance Company is subject to the administrative and regulatory jurisdiction of the Director. Oglesby Reinsurance Company has a certificate of authority to do an insurance business as a domestic stock company under 215 ILCS 5/24. Oglesby Reinsurance Company has registered with the director pursuant to 215 ILCS 5/131.13.

JURISDICTION AND VENUE

19. This Court has jurisdiction over this action arising under Illinois law.

20. The Director brings suit pursuant to her power “to institute such actions or other lawful proceedings as [s]he may deem necessary for the enforcement of the Illinois Insurance Code,” 215 ILCS 5/401(d), and pursuant to the declaratory judgment statute, 735 ILCS 5/2-701(a).

21. Venue lies in Cook County because defendants are insurance companies incorporated under the laws of Illinois, and the Department resides in Cook County. *See* 735 ILCS 5/2-103(e).

22. Venue lies in Cook County because defendants reside in Cook County because they are doing business in Cook County. *Id.* 5/2-101(1), 5/2-102(a).

23. Venue lies in Cook County because the transaction out of which the Director’s cause of action arose occurred in Cook County. *Id.* 5/2-101(2).

ALLEGATIONS FORMING THE BASIS OF THE DIRECTOR’S CLAIMS

A. The Director’s Pervasive Authority to Examine Illinois Insurers

24. The insurance business is “subject to a longstanding, complex and pervasive pattern of regulation” by the States. *United States v. Gordon*, 655 F.2d 478, 483 (2d Cir. 1981). In Illinois, any company wishing “to enter into a contract of insurance as an insurer or to transact insurance business in this State” needs a certificate of authority from the Director. 215 ILCS 5/121; *see also id.* 5/24 (domestic stock companies); 5/51 (domestic mutual companies); *id.* 5/109 (foreign

companies). The Director may revoke a certificate of authority held by any person who “knowingly fails or refuses to comply with any provision of this Code.” *Id.* 5/407.2(2).

25. A domestic insurance company must “keep its books, records, documents, accounts and vouchers in such manner that its financial condition, affairs and operations can be ascertained and so that its financial statements filed with the Director can be readily verified and its compliance with the law determined.” *Id.* 5/133(1). All such records “shall be preserved and kept available in this State for the purpose of examination until authority to destroy or otherwise dispose of such records is secured from the Director.” *Id.* 5/133(2).

26. The Insurance Code contains many different laws regulating aspects of the insurance business, some applicable to all insurance companies and others only to specific classes of insurance businesses.

27. As relevant here, first, the Financial Examinations Law is meant “to provide an effective system for the financial examination of the activities, operations, financial condition, and affairs of all persons transacting the business of insurance in this State.” *Id.* 5/132.1. The Financial Examinations Law grants the Department broad authority to examine any company “as often as the Director, in [her] sole discretion, deems appropriate.” *Id.* 5/132.3. The examinee “must facilitate the examination and aid in the examination so far as it is in their power to do so.” *Id.* 5/132.4(b).

28. Second, the Market Conduct Law authorizes “market conduct examinations,” defined broadly as “any type of examination, other than a financial examination.” *Id.* 5/132(a).¹

¹ Until Public Act 103-0897 amended the Market Conduct Law effective January 1, 2025, the statute had specified substantially the same scope under a prior system of enumerating subsections within this section at 215 ILCS 5/132(1).

As with financial examinations, the examinee “must facilitate the market conduct action and aid in the action so far as it is in their power to do so.” *Id.* 5/132(d).²

29. Third, the Insurance Holding Company Systems Act requires the registration of insurance companies that have affiliates, *id.* 5/131.13; obliges them to file annual reports and annual enterprise risk filings, *id.* 131.14–.14b; and grants the Director the power to pre-screen mergers, acquisitions, and related transactions, *id.* 5/131.4, .8, .20a. As under the other laws, “the Director shall have the power to examine any company registered under” the Insurance Holding Company System Act “to ascertain the financial condition of the company” considering the entire affiliate structure. *Id.* 5/131.21(a). The Director may order the production of “such records, books, or other information papers ... as are reasonably necessary to determine compliance,” including by demanding third-party information available to the company “pursuant to contractual relationships, statutory obligations, or other methods.” *Id.* 5/131.21(b).

30. Fourth, the Unfair Methods of Competition and Unfair and Deceptive Acts and Practices Act prohibits unfair methods of competition and unfair or deceptive acts or practices in the insurance industry. *Id.* 5/423. The Director has the power “to examine and investigate into the affairs of every person engaged in the business of insurance in this State ... in order to determine whether such person has been or is engaged in any unfair method of competition or in any unfair or deceptive act or practice” prohibited by the Act. *Id.* 5/425.

31. Insurance companies are legally obligated to bear the costs of the examinations that the Director undertakes pursuant to the above authorities. *See* 215 ILCS 5/408, 5/132.4(d), 5/131.21(3).

² Until Public Act 103-0897 took effect, substantially the same requirement had been codified at 215 ILCS 5/132(2).

B. The National System of State-Based Insurance Regulation

32. Unlike many other highly regulated industries, insurance regulation is almost entirely a creature of state law. “Congress removed all Commerce Clause limitations on the authority of the States to regulate and tax the business of insurance when it passed the McCarran-Ferguson Act” in 1945. *W. & S. Life Ins. Co. v. State Bd. of Equalization of California*, 451 U.S. 648, 653 (1981). Today, state insurance departments like the Department work collaboratively to ensure effective nationwide regulation.

33. The National Association of Insurance Commissioners (“NAIC”), formed in 1871, is the U.S. standard-setting and regulatory support organization created and governed by the chief insurance regulators from the 50 states, the District of Columbia, and five U.S. territories. Through the NAIC, state insurance regulators establish standards and best practices and coordinate their regulatory oversight. NAIC members, together with the central resources of the NAIC, form the national system of state-based insurance regulation in the United States.

34. Multiple provisions of the Illinois Insurance Code permit the Department to share confidential information gleaned through its examinations with other state insurance departments and the NAIC, if the recipients agree in writing to also hold the information confidential. *See* 215 ILCS 5/131.22(c)(1), 5/132(i)(3)(A), 5/132(k), 5/132.5(e)–(f).³ The most general such provision applies to “any confidential records or information” and permits the Director to share such records and information “upon the written agreement of the official or organization receiving the information to hold the information or records confidential and in a manner consistent with this Code.” *Id.* 5/404(1)(b).

³ Until Public Act 103-0897 took effect, substantially the same requirements currently codified at 215 ILCS 5/132(i)(3)(A) and (k) previously would have been addressed in 215 ILCS 5/132.5(f), which had included market conduct examinations within its scope until January 1, 2025.

35. All States, the District of Columbia, and the five U.S. territory members of the NAIC have executed master information sharing and confidentiality agreements in order to provide the requisite written agreement to hold information confidential, ensuring that Illinois and other States may share confidential information with each other in compliance with the Illinois Insurance Code.

C. The Director's November 2024 Examination of State Farm

36. On November 15, 2024, the Director issued financial examination warrants to each of the four State Farm defendants pursuant to her authority under the Financial Examinations Law, the Market Conduct Law, and the Insurance Holding Company Systems Act, as well as other laws. The warrants appointed Cynthia Andersen, the Department's Chief Financial Examiner and who works in Chicago, to "examine the business and affairs" of State Farm and "to make a full and true report to me of the examination made by them of [State Farm] with a full statement of the business, affairs, assets and obligations of [State Farm]." *See* Exhibits A–D.

37. On November 18, 2024, the Department's Assistant Chief Financial Examiner, whose office is located in Chicago, sent correspondence to State Farm providing copies of the examination warrants and making an initial information request as part of the November 2024 examination. In particular, the November 18 correspondence sought from State Farm "homeowners insurance premium information from 2018-2022 for all states in which [the State Farm] entities write such business"

38. Alongside the November 18 correspondence, the Department provided a Microsoft Excel .xlsx file that set forth in more detail the information that the Department required of State Farm as part of the November 2024 examination. Through completion of this file (the "Spreadsheet"), the Department required the production of information including:

- Total premiums collected;

- Number of policies and claims;
- Aggregate limits of insurance;
- Types of coverage provided;
- Deductibles imposed;
- Rates of cancellation and non-renewal; and
- Rates of “mitigation discounts,” meaning discounts given to homeowners who take measures to reduce various risks.

The Department required this information at the zip-code level nationwide.

39. The Department’s November 18, 2024, correspondence directed State Farm to complete and return the completed Spreadsheet by November 29, 2024.

40. The Director sought the information requested in the Spreadsheet in order to assess State Farm’s homeowners insurance business in several different respects: its financial condition and prospective solvency, its market conduct including rating and the handling of claims, and its enterprise risk in the entire group of affiliated State Farm companies. All these factors ultimately bear on the increasing unaffordability of homeowners insurance to everyday Illinois residents.

D. State Farm’s Records and Initial Responses

41. State Farm possesses documents located physically within the State of Illinois sufficient to provide complete responses to the November 2024 examination, including by completing the Spreadsheet, as to all policies that it issues nationwide, regardless of the physical location of the insured property. Additionally, as to any documents or information located outside the State of Illinois, State Farm is able to obtain access to such documents or information pursuant to contractual relationships, statutory obligations, or other methods.

42. State Farm possesses the technical capability to complete the Spreadsheet using data accessible to State Farm by working from computers located physically within the State of Illinois.

43. As a result, State Farm has the ability to return the completed Spreadsheet to the Director in a matter of days or weeks.

44. State Farm nevertheless has refused meaningfully to comply with the November 2024 examination, instead raising objections calculated to delay the proceeding without producing the ordered data to the Department.

45. State Farm has focused on two objections in refusing to comply with the November 2024 examination: First, that State Farm cannot be required to produce data accessible in Illinois about policies insuring properties located outside of Illinois; and second, that the Director might violate confidentiality protections for the data if State Farm produces it.

46. On November 22, 2024, for instance, State Farm noted that the November 2024 examination sought “nationwide zip code level” information. State Farm then demanded written confirmation that its information would “not be shared with the NAIC or another third-party,” or, “to the extent there is any sharing with the NAIC or other third-party,” State Farm demanded a promise that the Director would comply with 215 ILCS 5/131.22(c)(1). That provision, as noted *supra* ¶ 34, allows the Director to share confidential documents with the NAIC and other state regulators “provided that the recipient agrees in writing to maintain the confidentiality and privileged status of the document, material, or other information.” 215 ILCS 5/131.22(c)(1).

47. The Department replied in written correspondence on November 26, 2025, confirming that “the applicable confidentiality provisions” in the Code “will apply.”

48. State Farm replied in written correspondence the next day that because “the assurances” that it had “sought on November 22 were not provided,” State Farm was “regretfully not in a position to be able to provide the data.”

49. The Department sent further correspondence on December 16, 2024, questioning when State Farm would produce homeowners' insurance data to the Department pursuant to the November 2024 examination. State Farm replied reiterating its two objections to producing the data: First, it would produce only "Illinois data to the Illinois Department of Insurance"; and second, State Farm demanded further written confirmation that the Department would abide by confidentiality obligations.

E. The Director's Final Attempt to Secure State Farm's Voluntary Compliance

50. On August 12, 2025, the Department again wrote to State Farm seeking compliance with the November 15, 2024, financial examination warrants. The Department's Assistant Chief Financial Examiner, whose office is located in Chicago, sent correspondence to State Farm "providing formal notification to the State Farm Group of a revision to the scope of the target financial examination." "Instead of the time period of 2018-2022 in our letter of November 18, 2024," the Department explained that it now sought "homeowners insurance premium information from 2018-2024 for all states." Other than the expansion of the time period, the information requested remained the same.

51. Alongside the August 12 correspondence, the Department provided an updated Microsoft Excel .xlsx file that set forth the same information that the Department required of State Farm as part of the November 2024 examination, now expanded through calendar year 2024 (the "Updated Spreadsheet"). The Department instructed State Farm to complete and return the Updated Spreadsheet by August 26, 2025.

52. The Department also reiterated in the August 12 correspondence that it could not enter a separate "confidentiality agreement with the regulated company" and that existing statutory authorities provided "broad confidentiality protections whenever a domestic company submits any information to [the Department]."

53. On August 26, 2025, State Farm replied with a refusal to return the Updated Spreadsheet: “State Farm is, regrettably, unable to provide the information sought through the Template in Part A of the Target Exam.” State Farm again argued that the Department lacks the authority to examine State Farm’s records concerning policies that insure properties located in other States.

CLAIM FOR DECLARATORY AND EQUITABLE RELIEF

54. The Director incorporates by reference the allegations in the paragraphs above.

55. State Farm has refused to abide by the demands of the November 2024 examination (both as originally issued and as updated in August 2025) in violation of 215 ILCS 5/132.4(b), 5/132(d), 5/131.21(1.5), and 5/425.

56. The Director and State Farm have an actual controversy over whether State Farm must produce zip-code level data regarding all homeowners policies that it writes pursuant to the November 2024 examination.

57. State Farm opposes compliance with the November 2024 examination, relying upon two legally baseless objections: First, that it cannot be required to produce data accessible in Illinois about policies insuring properties located outside of Illinois; and second, that the Director might hypothetically, in the future, violate confidentiality protections for the data if State Farm produces it.

58. The Director has a tangible legal interest in ensuring that State Farm complies with its obligations under the Insurance Code. First, the Illinois-based records of an Illinois-based company required by law to keep complete copies of its records in Illinois are subject to examination by the Director. Second, the Director is not obligated to promise regulated entities that she will follow legal confidentiality protections before the regulated entity cooperates with an

examination. “[G]overnment bodies are presumed to act lawfully.” *Chi. All. for Neighborhood Safety v. City of Chicago*, 348 Ill. App. 3d 188, 210 (1st Dist. 2004).

59. The Director and State Farm’s opposing positions present a concrete dispute and actual controversy admitting of immediate and definitive determination, which will aid in the termination of this controversy.

60. The Director is empowered to institute such actions or other lawful proceedings as she may deem necessary for the enforcement of the Illinois Insurance Code. *Id.* 5/401(d). The Director deems this action necessary to address State Farm’s noncompliance with the November 2024 examination.

61. This dispute is appropriate for the entry of declaratory relief. *See* 735 ILCS 5/2-701(a). When a court enters a declaratory judgment, it may also grant other appropriate relief, including injunctive relief. *See id.* 5/2-701(b). Injunctive relief is appropriate in this case to ensure that State Farm complies with the November 2024 examination.

62. The Director accordingly seeks a judicial declaration that State Farm must produce data regarding all its policies nationwide for the years 2018 to 2024 pursuant to the November 2024 examination warrants and an injunction requiring State Farm to complete and return the completed Updated Spreadsheet by a date certain.

PRAYER FOR RELIEF

WHEREFORE, the Director prays that this Court:

- A. Enter judgment for the Director and against defendants;
- B. Declare that defendants are obligated to comply with the demands of the November 2024 examination and aid in it so far as it is in their power to do so, including by producing information not in the possession of State Farm if State Farm can obtain access to such information pursuant to contractual relationships, statutory obligations, or other methods;

C. Declare that defendants are obliged to produce data and other information in response to the November 2024 examination as to all policies they write, regardless of the physical location of the insured property;

D. Order defendants to complete the Updated Spreadsheet and provide it to the Director by a date certain, including data as to all policies they write, regardless of the physical location of the insured property; and

E. Grant such other relief as is warranted.

Dated: October 10, 2025

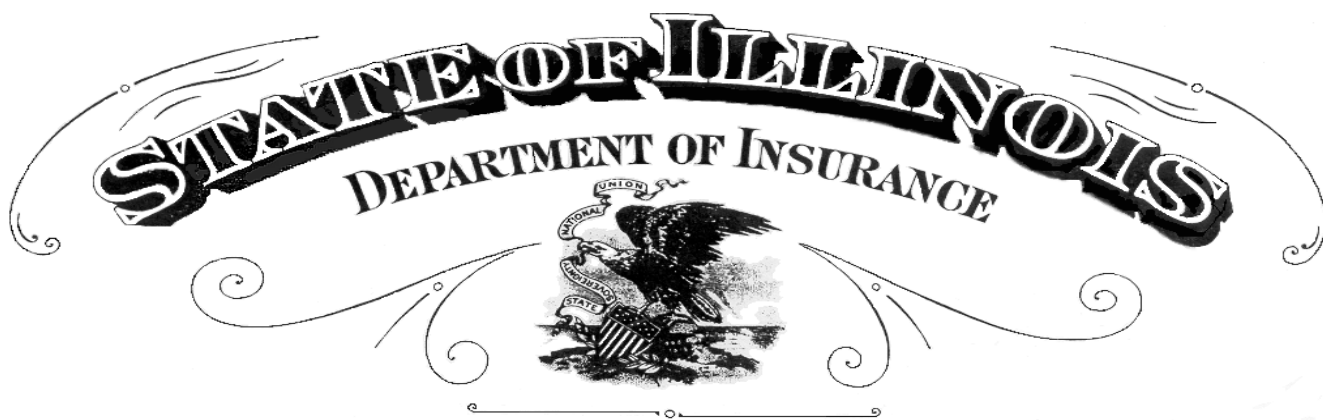
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Respectfully submitted,

KWAME RAOUL,
Attorney General of Illinois, on behalf of
Ann Gillespie, Illinois Director of Insurance

By: /s/ R. Henry Weaver
Assistant Attorney General

EXHIBIT A



PROPERTY AND CASUALTY WARRANT -23006-3

**IN THE MATTER OF
THE EXAMINATION OF
STATE FARM FIRE AND CASUALTY INSURANCE COMPANY
ONE STATE FARM PLAZA
BLOOMINGTON, ILLINOIS 61710**

TARGET FINANCIAL EXAMINATION WARRANT

I, the undersigned, Director of Insurance of the State of Illinois, pursuant to Sections 131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425 of the Illinois Insurance Code (215 ILCS 5/131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425) do hereby appoint **Cynthia Andersen, CFE**, and associates as the proper persons to examine the business and affairs of the **STATE FARM FIRE AND CASUALTY INSURANCE COMPANY**, of **Bloomington, Illinois** and to make a full and true report to me of the examination made by them of said Company with a full statement of the business, affairs, assets and obligations of said Company, with any other information as shall in their opinion be requisite to furnish me a statement of the condition of its business and affairs.

The persons so appointed shall also have the power to administer oaths and to examine any person concerning the business, conduct or affairs of said Company.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the Official Seal of the Department of Insurance in the City of Springfield, Illinois,

this 15 day of November 2024

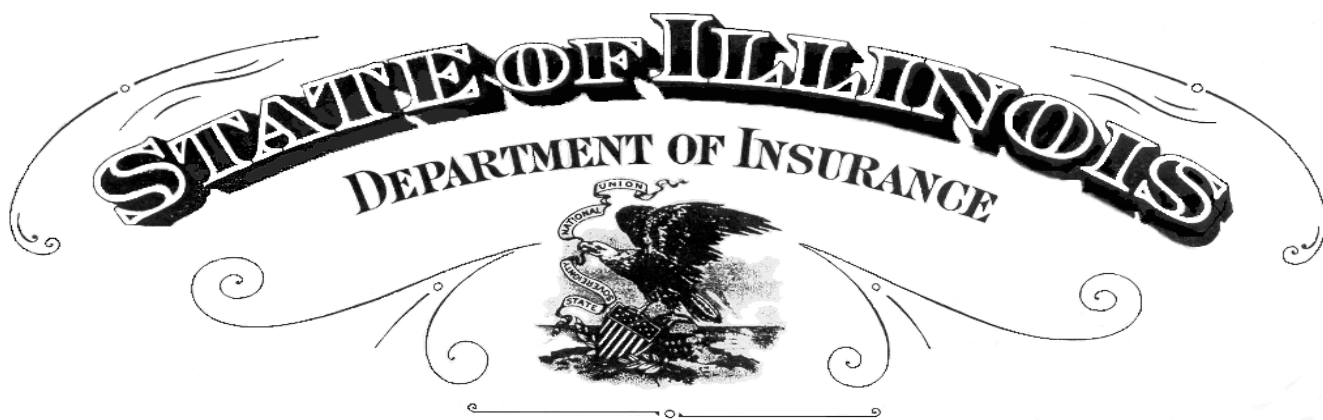


Ann Gillespie

Ann Gillespie

Acting Director

EXHIBIT B



PROPERTY AND CASUALTY WARRANT -23003-3

**IN THE MATTER OF
THE EXAMINATION OF
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
ONE STATE FARM PLAZA
BLOOMINGTON, ILLINOIS 61710**

TARGET FINANCIAL EXAMINATION WARRANT

I, the undersigned, Director of Insurance of the State of Illinois, pursuant to Sections 131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425 of the Illinois Insurance Code (215 ILCS 5/131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425) do hereby appoint **Cynthia Andersen, CFE**, and associates as the proper persons to examine the business and affairs of the **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY**, of **Bloomington, Illinois** and to make a full and true report to me of the examination made by them of said Company with a full statement of the business, affairs, assets and obligations of said Company, with any other information as shall in their opinion be requisite to furnish me a statement of the condition of its business and affairs.

The persons so appointed shall also have the power to administer oaths and to examine any person concerning the business, conduct or affairs of said Company.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the Official Seal of the Department of Insurance in the City of Springfield, Illinois,

this 15 day of November 2024



Ann Gillespie

Ann Gillespie

Acting Director

EXHIBIT C



PROPERTY AND CASUALTY WARRANT -23004-3

IN THE MATTER OF
 THE EXAMINATION OF
 STATE FARM GENERAL INSURANCE COMPANY
 ONE STATE FARM PLAZA
 BLOOMINGTON, ILLINOIS 61710

TARGET FINANCIAL EXAMINATION WARRANT

I, the undersigned, Director of Insurance of the State of Illinois, pursuant to Sections 131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425 of the Illinois Insurance Code (215 ILCS 5/131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425) do hereby appoint **Cynthia Andersen, CFE**, and associates as the proper persons to examine the business and affairs of the **STATE FARM GENERAL INSURANCE COMPANY**, of **Bloomington, Illinois** and to make a full and true report to me of the examination made by them of said Company with a full statement of the business, affairs, assets and obligations of said Company, with any other information as shall in their opinion be requisite to furnish me a statement of the condition of its business and affairs.

The persons so appointed shall also have the power to administer oaths and to examine any person concerning the business, conduct or affairs of said Company.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the Official Seal of the Department of Insurance in the City of Springfield, Illinois,

this 15 day of November 2024

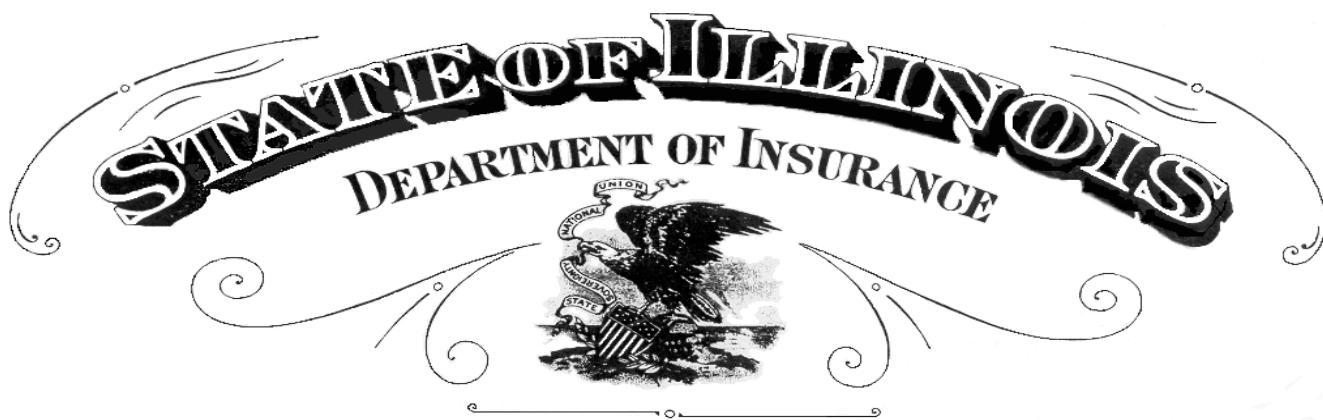


Ann Gillespie

Ann Gillespie

Acting Director

EXHIBIT D



PROPERTY AND CASUALTY WARRANT -23008-3

IN THE MATTER OF
 THE EXAMINATION OF
 OGLESBY REINSURANCE COMPANY
 ONE STATE FARM PLAZA
 BLOOMINGTON, ILLINOIS 61710

TARGET FINANCIAL EXAMINATION WARRANT

I, the undersigned, Director of Insurance of the State of Illinois, pursuant to Sections 131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425 of the Illinois Insurance Code (215 ILCS 5/131.21, 132.2, 132.3, 132.4, 132.5, 401, 402, 403 and 425) do hereby appoint **Cynthia Andersen, CFE**, and associates as the proper persons to examine the business and affairs of the **OGLESBY REINSURANCE COMPANY**, of **Bloomington, Illinois** and to make a full and true report to me of the examination made by them of said Company with a full statement of the business, affairs, assets and obligations of said Company, with any other information as shall in their opinion be requisite to furnish me a statement of the condition of its business and affairs.

The persons so appointed shall also have the power to administer oaths and to examine any person concerning the business, conduct or affairs of said Company.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the Official Seal of the Department of Insurance in the City of Springfield, Illinois,

this 15th day of November 2024



Ann Gillespie

Ann Gillespie

Acting Director