



Will Hild
8300 Boone Boulevard Suite 500
Vienna, VA 22182
P: (202) 898 - 0542
info@consumersresearch.org

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Subject: Request for regulatory review of ideology-driven conduct in the insurance sector

Dear Commissioner,

On behalf of Consumers' Research, the nation's oldest consumer advocacy organization, I write to provide our new *Consumer Warning*, "Chubb and the Woke Insurance Industry." The enclosed materials raise concerns about Chubb and other insurers that appear to have used corporate influence, governance structures, and public-facing programs to advance contested ideological goals that may have little to do with the fair, lawful, and risk-based provision of insurance. Given your office's responsibility to protect policyholders and to ensure that insurers operating in your state comply with state law and sound insurance practice, we wanted to bring these findings to your attention.

Across the country, states have increasingly taken steps to push back against ideology-driven conduct in financial markets and other regulated spaces. Examples like West Virginia's [bill](#) creating a restricted list for fossil-fuel boycotts and Florida's [legislation](#) to require state fiduciaries to use only financial factors and bar ESG or political goals in state investing and proxy voting, and others illustrate the broader principle that institutions entrusted with serving the public should be judged on lawful, objective, and mission-relevant criteria, not on political fashion or ideological pressure.

In a state-regulated industry, consumers are entitled to expect that underwriting, pricing, renewals, claims handling, and customer service are based on lawful and actuarially relevant factors, not on ideology, public-relations goals, or pressure from outside activists. If major carriers are allowing political commitments or advocacy priorities to seep into their business decisions, policyholders may bear the cost.

The enclosed *Consumer Warning* identifies Chubb as a particularly notable example. Based on public statements and corporate materials, the report raises questions about whether Chubb has embraced social and political initiatives in a manner that could affect consumers or business partners on grounds unrelated to actuarial risk. The report also highlights public statements and international relationships with the Chinese Communist Party involving Chubb CEO Evan Greenberg that, in our view, merit scrutiny given broader national-security concerns and the importance of transparency from major financial institutions.

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After Consumers' Research began publicizing these concerns, certain public-facing materials appear to have been revised or removed. That does not by itself establish wrongdoing, but it underscores the need for regulators to obtain a clear record directly from the company rather than rely solely on after-the-fact public messaging.

The *Consumer Warning* also identifies other insurers as part of a broader industry trend. Public materials from Liberty Mutual and Nationwide suggest that Chubb may not be an isolated case, and that broader review of ideology-driven conduct across the insurance sector may be warranted. At a minimum, Consumers' Research believes they justify careful review of whether major insurers are prioritizing ideology over objective risk assessment and consumer protection.

Additionally, Chubb and other major insurance companies are strongly supportive of reforms that would strip away ordinary Americans' ability to challenge large, resource-heavy corporations in court. We believe consumers should have the ability to seek support in their efforts to hold companies like Chubb accountable for pushing woke activism and any policies that would help them to avoid accountability should be stymied immediately.

I hope this report can be a resource as you assess whether further investigation or enforcement action is warranted. At a minimum, we believe the materials justify closer examination of whether major insurers are allowing political agendas to shape decisions that should instead be guided by law, actuarial discipline, and the interests of your constituency.

Thank you for your efforts to ensure that insurance companies in your state prioritize consumers over ideology. Should you have any further questions, please do not hesitate to reach out to Consumers' Research.

Respectfully,

Will Hild

Will Hild
Executive Director, Consumers' Research

Attachment:

Consumers' Research Consumer Warning: Chubb & The Woke Insurance Industry: A Radical Activism Machine Aimed at Consumers

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