

**BEFORE THE COMMISSIONER OF SECURITIES AND INSURANCE,  
OFFICE OF THE MONTANA STATE AUDITOR**

IN THE MATTER OF

Health Care Service Corporation, a Mutual  
Legal Reserve Company, d/b/a Blue Cross  
Blue Shield of Montana,

Respondent.

Case No. INS-2025-00320

**NOTICE OF HEARING AND ORDER  
APPOINTING HEARING EXAMINER**

Pursuant to Mont. Code Ann. § 33-1-701, the Commissioner of Securities and Insurance, Office of the Montana State Auditor (CSI) intends to hold a hearing to receive evidence concerning whether Health Care Service Corporation, a Mutual Legal Reserve Company, d/b/a Blue Cross Blue Shield of Montana (“BCBSMT”) violated Mont. Code Ann. § 33-19-321 concerning computer security breaches. Specifically, CSI is investigating the cybersecurity event involving Conduent Business Services LLC that BCBSMT reported to CSI in October 2025. Should CSI find that BCBSMT violated Mont. Code Ann. § 33-19-321, CSI may impose a fine of up to \$25,000 per violation. *See* Mont. Code Ann. § 33-1-317.

The hearing is scheduled for January 22, 2026, at 2:00 pm MST at 840 Helena Avenue, Helena, Montana. BCBSMT is invited to attend the hearing and provide relevant evidence through an attorney licensed to practice law in Montana. *See* Admin. R. Mont. 1.3.231.

David Sanders, Chief of Staff for CSI, is hereby appointed as the Hearing Examiner for purposes of presiding over the hearing and preparing a proposed decision in this matter. All communications regarding this hearing must be in writing and delivered to David Sanders at [DSanders@mt.gov](mailto:DSanders@mt.gov); Jack Connors, Chief Legal Counsel for CSI, at [jack.connors@mt.gov](mailto:jack.connors@mt.gov); and Brandy Morrison, Paralegal for CSI, at [Brandy.Morrison@mt.gov](mailto:Brandy.Morrison@mt.gov).

DATED this 23rd day of December, 2025.


  
**JAMES BROWN**  
Commissioner of Securities and Insurance  
Montana State Auditor

### CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2025, I caused a copy of the foregoing *Notice of Hearing and Order Appointing Hearing Examiner* to be served on the following persons by the following means:

         Hand Delivery  
1, 2, 3      Mail  
1, 2, 3      E-Mail

1.     Lynn Sessions  
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2.     Stefanie Ferrari  
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3.     Sean Slanger  
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Brandy Morrison  
Paralegal