STATE OF CONNECTICUT

INSURANCE DEPARTMENT

Market Conduct Report

of

IDS Property Casualty Insurance Company

March 22, 2018

The Market Conduct Division of the Connecticut Insurance Department examined the books and records of IDS Property Casualty Insurance Company by survey using a sample period of January 1, 2015 through December 31, 2015. The examination was limited to Connecticut business.

The IDS Property Casualty Insurance Company is domiciled in the State of Wisconsin. By authority granted under Section 38a-15 of the Connecticut General Statutes, this examination was conducted by Market Conduct examiners of the State of Connecticut Insurance Department at the Department's office in Hartford, Connecticut.

The purpose of the survey examination was to evaluate the company's market conduct practices in the State of Connecticut. The examiners reviewed material supplied by the company which included internal audits, disaster recovery plans, procedures and controls, complaints, advertising, new business, claims, and underwriting, during the period of examination.

The Department's findings are as follows:

Two (2) individuals acting as producers of IDS Property Casualty Insurance Company were not licensed to write business in Connecticut.

Four (4) individuals acting as casualty adjusters for IDS Property Casualty Insurance Company were not licensed to adjust claims in Connecticut.

In thirty-six (36) instances, claimants were not compensated for loss of use as required by Connecticut Regulation.

In five (5) instances, bodily injury liability claims were settled within 15 days of the loss.

As it relates to the issues listed above, the company was not in compliance with applicable Connecticut Statutes and Regulations.

STATE OF CONNECTICUT

INSURANCE DEPARTMENT

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IN THE MATTER OF: DOCKET MC 18-19

IDS PROPERTY CASUALTY INSURANCE COMPANY:

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STIPULATION AND CONSENT ORDER

It is hereby stipulated and agreed between IDS Property Casualty Insurance Company and the State of Connecticut Insurance Department by and through Katharine L. Wade, Insurance Commissioner, to wit:

I

WHEREAS, pursuant to a Market Conduct examination, the Commissioner alleges the following with respect to IDS Property Casualty Insurance Company:

1. IDS Property Casualty Insurance Company, hereinafter referred to as Respondent, is domiciled in the State of Wisconsin and is licensed to transact property and casualty insurance in the State of Connecticut. The NAIC company code number is 29068.

2. From October 11, 2017 through March 22, 2018, the Department conducted an examination of Respondent's market conduct practices in the State of Connecticut covering the period January 1, 2015 through December 31, 2015.

3. During the period under examination, Respondent failed to follow established practices and procedures to ensure compliance with statutory requirements resulting in instances of:

   a) unlicensed individuals soliciting, negotiating, or effecting insurance

   b) failure to undertake to pay claims for loss of use

   c) unlicensed individuals acting as Casualty Adjusters

   d) bodily injury liability claims settled within 15 days of the loss

4. The conduct described in paragraph three is in violation of Sections 38a-702b, 52-572a and 38a-792 of the Connecticut General Statutes, and 38a-334-2(c) and 38a-334-5(a) of the Connecticut Regulations and constitutes cause for the imposition of a fine or other administrative penalty under Sections 38a-2, 38a-41 and 38a-817 of the Connecticut General Statutes.

II

1. WHEREAS, Respondent admits the allegations in paragraphs three and four of Article I of this Stipulation and Consent Order; and

2. WHEREAS, Respondent agrees to undertake a complete review of its practices and procedures, with respect to those areas of concern, as described in the Market Conduct Report and this Stipulation, so that those areas of concern are compliant with Connecticut Statutes; and

3. WHEREAS, Respondent agrees to provide the Insurance Commissioner with a full report of findings and a summary of actions taken to comply with the requirements of paragraph two of this Section within ninety (90) days of the date of this document; and

4. WHEREAS, Respondent agrees to pay a fine in the amount of $23,000 for the violations described herein; and

5. WHEREAS, Respondent, being desirous of terminating administrative action without the necessity of a formal hearing or further litigation, does consent to the making of this Consent Order and voluntarily waives:

   a. any right to notice and a hearing; and

   b. any requirements that the Insurance Commissioner's decision contain a statement of findings of fact and conclusions of law; and

   c. any and all rights to object to or challenge before the Insurance Commissioner or in any judicial proceeding any aspect, provision or requirement of this Stipulation

NOW THEREFORE, upon the consent of the parties, it is hereby ordered and adjudged:

1. That the Insurance Department has jurisdiction of the subject matter of this administrative proceeding.

2. That IDS Property Casualty Insurance Company is ordered to pay a fine in the amount of Twenty-Three Thousand Dollars ($23,000.00).

IDS Property Casualty Insurance Company

By: Thomas A Bolzano
(Representative of Insurance Company)

CERTIFICATION

The undersigned deposes and says that she/he has duly executed this Stipulation and Consent Order on this 15th day of May 2018, for and on behalf of IDS Property Casualty Insurance Company; that she/he is the of such company, and she/he has authority to execute and file such instrument.

By: Thomas S Botsford

STATE OF WISCONSIN

SS

COUNTY OF BROWN

On the 15TH day of MAY 2018, before me personally appeared THOMAS S BOTSFORD , sealer of the foregoing Stipulation and Consent Order, acknowledged same to be her/his act and deed.

KATHY A. FUNK
Notary Public
State of Wisconsin

Kathy A Funk

Notary Public/~~Commissioner of The Superior Court~~
MY COMMISSION EXPIRES 5/1/2020

Section Below To Be Completed by State of Connecticut Insurance Department

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Dated at Hartford, Connecticut this 17 day of May 2018.

Katharine L. Wade

Katharine L. Wade
Insurance Commissioner