

Market Conduct Report

**Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.**

August 3, 2020

Connecticut Insurance Department

TABLE OF CONTENTS

	Page
I. <u>Introduction</u>	1
A. Statutory Authority	1
B. Scope of Examination.....	1
C. Company Profile.....	1
D. Market Conduct Reports	1
E. Privacy of Consumer Financial Information	2
II. <u>Items Examined</u>	3
A. Operations and Management.....	3
B. Complaint Handling	5
C. Marketing and Sales	6
D. Producer Licensing	6
E. Policyholder Service	7
F. Underwriting and Rating.....	8
G. Claims	12
III. <u>Summary of Recommendations</u>	16
IV. <u>Acknowledgment</u>	18

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

I. INTRODUCTION

A. Statutory Authority

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 companies' office located in Milford, Connecticut.

B. Scope of Examination

From April 28, 2019 to on or about December 7, 2019, the Market Conduct Division of the Connecticut Insurance Department examined the market conduct practices of the companies using a sample period of July 1, 2017 through June 30, 2018. The examination was limited to Connecticut business.

C. Company Profile

<u>Company</u>	<u>Commenced Business</u>	<u>State of Domicile</u>
Progressive Casualty Insurance Company	November 17, 1956	OH
Progressive Direct Insurance Company	September 29, 1986	OH
American Strategic Insurance Corp.	August 18, 1997	FL

Direct premiums written as of December 31, 2018 are as follows:

	<u>Connecticut</u>	<u>Total</u>
Progressive Casualty Insurance Company	197,854,331	7,812,557,605
Progressive Direct Insurance Company	164,456,062	8,901,859,292
American Strategic Insurance Corp.	25,833,700	1,062,554,850

D. Market Conduct Reports

The examiners generated a listing of market conduct examination reports using National Association of Insurance Commissioners' I-Site. This information was used to request market conduct examination reports from the company.

The examiners obtained copies of all relevant market conduct examination reports

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

which had been issued to the company during the three (3) years preceding the examination. The reports were reviewed to identify any recommendations that had been made by the respective Insurance Departments and to determine whether the company had taken appropriate corrective action in response to those recommendations.

It appears that the company has taken appropriate corrective action in these instances.

E. Privacy of Consumer Financial Information

Standard 1: The companies have adequate procedures in place for the protection of consumer financial information.

The companies appear to be in compliance.

Standard 2: The companies provide each consumer with an initial privacy notice in accordance with statutes, rules and regulations.

The companies appear to be in compliance.

Standard 3: The companies provide each consumer with an annual privacy notice in accordance with statutes, rules and regulations but at a minimum annually.

The companies appear to be in compliance.

Standard 4: The companies provide each consumer with an opt out notice in accordance with statutes, rules and regulations.

The companies appear to be in compliance.

Standard 5: The companies provide each consumer with a revised privacy notice in accordance with statutes, rules and regulations.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 6: All notices are provided in the required timeframe so as to minimize any improper intrusion into the privacy of consumers.

The companies appear to be in compliance.

Standard 7: The companies comply with all requirements for the disclosure of non-public personal financial information to non-affiliated third parties so as to minimize any improper intrusion into the privacy of consumers.

The companies appear to be in compliance.

Standard 8: The companies comply with all requirements for the disclosure and redisclosure of nonpublic personal financial information so as to minimize any improper intrusion into the privacy of consumers.

The companies appear to be in compliance.

Standard 9: The companies have procedures for the sharing of consumer account numbers so as to minimize any improper intrusion into the privacy of consumers.

The companies appear to be in compliance.

II. ITEMS EXAMINED

A. Operations and Management

Standard 1: The companies have an up-to-date, valid internal or external audit program.

The company provided its claim audit review program known as CCR or Claim Competency Review. It is a process that reviews closed files to identify potential areas of opportunity in order to improve and provide excellent claim service. Its aim is to identify areas of opportunity and provide areas of insight as to where resources such as training may be needed.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 2: The companies have appropriate controls, safeguards and procedures for protecting the integrity of computer information.

The Enterprise Security Policy was reviewed regarding the protection of protected personal information. Various controls and safeguards are in place to ensure the security, confidentiality and integrity this information.

Standard 3: The companies have an antifraud plan in place.

The Connecticut Anti-Fraud Plan for 2018 was reviewed. The plan covers both Underwriting and Claim investigation procedures. The Connecticut Investigations Anti-Fraud Unit is comprised of a Special Investigations Unit and a Corporate Investigations Department. The companies work with law enforcement personnel and prosecutors in seeking court awarded restitutions in criminal proceedings.

Standard 4: The companies have a valid disaster recovery plan.

The Strategic Continuity Business Recovery Plan was reviewed. The plan was designed to lessen the impact of business disruptions that result from loss of people, building infrastructure outages, system interruptions such as computers and vendor unavailability.

Standard 5: The companies adequately monitor the activities of the managing general agents.

American Strategic Insurance Corp. utilizes managing general agents and appear to adequately monitor their activities. Both Progressive Direct and Progressive Casualty Insurance Company do not utilize managing general agents.

Standard 6: The companies' contract with managing general agents complies with applicable statutes, rules and regulations.

The MGA Agreement for American Strategic Insurance Company was reviewed and appears to be in compliance.

Standard 7: Records are adequate, accessible, consistent and orderly, and comply with State record retention requirements.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 8: The companies are licensed for the lines of business that are being written.

The companies appear to be in compliance.

Standard 9: The companies cooperate on a timely basis with examiners performing the examination.

The companies were in compliance.

B. Complaint Handling

Standard 1: All complaints are recorded in the required format on the companies' complaint register.

The examiners reviewed a total of one hundred forty-seven (147) complaints registered with the Department. In addition, they also reviewed non-insurance department complaints on the companies complaint registers. The companies complaint registers were in the required format.

Standard 2: The companies have adequate complaint handling procedures in place and communicate such procedures to policyholders.

The companies appear to be in compliance.

Standard 3: The companies take adequate steps to finalize and dispose of the complaint in accordance with applicable statutes, rules and regulations, and contract language.

The companies appear to be in compliance.

Standard 4: The time frame within which the companies respond is in accordance with applicable statutes, rules and regulations.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

C. Marketing and Sales

Standard 1: All advertising and sales materials are in compliance with applicable statutes, rules and regulations.

The companies appear to be in compliance.

Standard 2: The companies' internal producer training materials are in compliance with applicable statutes, rules and regulations.

The companies appear to be in compliance.

Standard 3: The companies' communications to producers are in compliance with applicable statutes, rules and regulations.

The companies appear to be in compliance

Standard 4: The companies' mass marketing of property and casualty insurance is in compliance with applicable statutes, rules and regulations.

The companies do not mass market insurance.

D. Producer Licensing

Standard 1: The companies' records of licensed and appointed producers agree with Insurance Department's records.

The companies appear to be in compliance.

Standard 2: The producers are properly licensed and appointed in the jurisdiction where the application was taken.

The American Strategic Insurance Corp. was not in compliance with producer appointments.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 3: Termination of producers complies with statutes regarding notification to the producer and notification to the State, if applicable.

The companies appear to be in compliance.

Standard 4: The companies' policy of producer appointments and terminations does not result in unfair discrimination against policyholders.

The companies appear to be in compliance.

Standard 5: Records of terminated producers adequately document the reasons for termination.

The companies appear to be in compliance.

E. Policyholder Service

Standard 1: Premium notices and billing notices are sent out with an adequate amount of advance notice.

Private Passenger Automobile
Progressive Direct Insurance Company

In a sample of private passenger automobile renewals, two (2) renewals were found to be short notices.

Standard 2: Policy issuance and insured requested cancellations are timely.

The companies appear to be in compliance.

Standard 3: All correspondence directed to the companies is answered in a timely and responsive manner by the appropriate department.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

F. Underwriting and Rating

Standard 1: The rates charged for the policy coverage are in accordance with filed rates or the companies' rating plan.

Private Passenger Automobile
Progressive Casualty Insurance Company
Progressive Direct Insurance Company
Incorrect Territory Assignments

It was determined during the rating review that the companies did not have proper controls in place to ensure compliance with Connecticut Regulations 38a-686-2. Specifically, an insurer shall not split a city or town into two or more geographical territories if more than one zip code is ascribed to a particular town or city. During review, it was apparent that the companies did not have an edit in place to ensure that any overlapping zip codes were assigned to a specific town correctly. The town placement selection was left to the insured applicant or agent to choose.

It was also determined that Progressive Direct Insurance Company charged a ten dollar (\$10) fee and a 20% premium surcharge factor for an SR-22 financial responsibility filing to the Connecticut Department of Motor Vehicles. In July of 2004, Public Act 04-199 eliminated the need for SR-22 filings. The company advised a total of 497 policies had a surcharge and fee applied to the premium. The total additional premiums amounted to \$52,720 in charges to insureds for a filing that had been eliminated by law.

It was also determined the company utilizes a vehicle history rating factor that can adversely impact the premium by applying a higher rating factor that would increase the premium. The company does not however advise the insured that Carfax was utilized for this purpose, nor does it provide specific address or phone contact to dispute this information.

Standard 2: Disclosures to insureds concerning rates and coverages are accurate and timely.

Private Passenger Automobile
Progressive Casualty Insurance Company

In a sample of non-pay cancellations, the company was not able to provide the examiners documentation showing insureds original application request along with the original new business declaration page showing the original request. The company, however, maintains that it does not issue declarations with the original request until after it does an

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

underwriting review. The company then will send the applicant insured an amended declaration advising that the policy information has changed and that the coverage summary replaces the prior one. The company stated if they issue the insureds original application request, it may have caused confusion. The company is not in compliance with Connecticut General Statutes, Section 38a-15 with regard to maintaining original application documentation requests.

Standard 3: The companies do not permit illegal rebating, commission cutting or inducements.

The companies appear to be in compliance.

Standard 4: Credits and deviations are consistently applied on a non-discriminatory basis.

The companies appear to be in compliance.

Standard 5: Schedule rating or individual risk premium modification plans, where permitted, are based on objective criteria with usage supported by appropriate documentation.

The examination did not review commercial lines insurance.

Standard 6: The companies' underwriting practices are not unfairly discriminatory. The companies adhere to applicable statutes, rules, regulations and companies' guidelines in the selection of risks.

The companies appear to be in compliance.

Standard 7: All forms and endorsements forming a part of the contract are listed on the declarations page and should be filed with the Department of Insurance.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 8: The producers are properly licensed and appointed in the jurisdiction where the application was taken.

Homeowners

American Strategic Insurance Corp.

It was determined that eighteen (18) producers were not appointed in accordance with Connecticut General Statutes, Section 38a-702m.

Standard 9: Underwriting, rating and classifications are based on adequate information developed at or near inception of the coverage rather than near expiration or following a claim.

The companies appear to be in compliance.

Standard 10: File documentation adequately supports decisions made.

Private Passenger Automobile

Progressive Casualty Insurance Company

Declinations

During the review of private passenger automobile declinations, the company was not able to provide specific documentation regarding the declination of applicants for automobile coverage. The company documentation provided was not specific with regard to drivers, vehicles, types of incidents and other specific reasons as to why an applicant did not meet the company's filed and specific underwriting criteria.

Standard 11: Policies and endorsements are issued or renewed accurately, timely and completely.

Progressive Casualty Insurance Company

In a sample of new business automobile policies, the company was not able to provide seven (7) new business applications requested for review.

In a sample of automobile endorsements, one (1) endorsement failed to apply full glass comprehensive coverage to the vehicle.

Standard 12: Audits, when required, are conducted accurately and timely.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 13: The companies verify that VIN number submitted with application is valid and that the correct symbol is utilized.

The companies appear to be in compliance.

Standard 14: The companies do not engage in collusive or anti-competitive underwriting practices.

The companies appear to be in compliance.

Standard 15: Rejections and declinations are not unfairly discriminatory.

See Standard 10.

Standard 16: Cancellation/non-renewal notices comply with policy provisions and State laws, and companies' guidelines.

See below.

Standard 17: Cancellation/non-renewal notices comply with policy provisions and State laws, including the amount of advance notice provided to the insured and other parties to the contract.

Automobile Cancellations

Progressive Casualty Insurance Company

In a sample of sixty (60) automobile cancellations, a total of fifty-eight (58) mid-term cancellations failed to give required forty-five (45) day notice. In addition, there were eight (8) cancellations that were non-specific.

Progressive Direct Insurance Company

In a sample of sixty (60) automobile cancellations, a total of fifty-nine (59) were determined to be short notices and one cancellation was determined to be non-specific.

Automobile Non-Renewals

Progressive Casualty Insurance Company

Three (3) non-renewals were non-specific.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 18: Unearned premiums are correctly calculated and returned to appropriate party in a timely manner, and in accordance with applicable statutes, rules and regulations.

The companies appear to be in compliance.

Standard 19: Rescissions are not made for non-material misrepresentation.

The companies appear to be in compliance.

Standard 20: All policies are correctly coded.

The companies appear to be in compliance.

G. Claims

Standard 1: The initial contact by the companies with the claimant is within the required time frame.

The companies appear to be in compliance.

Standard 2: Timely investigations are conducted.

The companies appear to be in compliance.

Standard 3: Claims are resolved in a timely manner.

The companies appear to be in compliance.

Standard 4: The companies respond to claim correspondence in a timely manner.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 5: Claim files are adequately documented.

The companies appear to be in compliance.

Standard 6: Claim files are handled in accordance with policy provisions and applicable statutes, rules and regulations.

Private Passenger Automobile
Progressive Casualty Insurance Company

In a sample of automobile property damage liability claims, in some instances based on documentation we could not determine if company considered loss of use in the settlement of the claim in violation of Connecticut Regulations 38a-334-2 (c) and 38a-334-5 (a). Two (2) claims had claim delay errors.

In a sample of automobile collision claims, one (1) claim file was determined to have an overpayment.

In a sample of automobile closed without payment claims, there were two (2) instances in which proper denials were not sent.

In a sample of automobile subrogated claims, it was determined that one (1) settlement did not return insureds rental car payment. A total of \$232 was returned to insured. One (1) claim settlement only returned half of the insureds deductible. A total of \$500 was reimbursed to insured. Three (3) claim settlements had delays in payment and reissue of insureds' deductibles. One (1) claim settlement had a delay in the processing and return of insured's deductible after receiving the amount from claimant's carrier.

In a sample of automobile personal injury protection claims, one (1) claim file did not reissue a cancelled check to claimant.

In a sample of automobile rental reimbursement claims, one (1) claim file was determined to have an overpayment.

Progressive Direct Insurance Company

In a sample of automobile property damage liability claims, two (2) claims did not consider loss of use in the settlement of the claim in violation of Connecticut Regulations 38a-334-2 (c) and 38a-334-5 (a). One (1) claim was found to have a claim delay and one (1) claim had a lack of documentation.

In a sample of automobile collision claims, there was one (1) claim handling error and one (1) claim had a condition adjustment error on a total loss vehicle.

In a sample of automobile comprehensive claims, there was one (1) claim handling error.

In a sample of automobile subrogated claims, a total of four (4) claims had an undue delay in payment, one (1) claim did not have any documentation to support adverse subrogation pursuit, one (1) claim owed an out of pocket payment of \$100.57.

In a sample of automobile litigated claims, there were two (2) claim handling errors and one (1) claim did not consider loss of use in the settlement. A total of \$388 was returned to the claimant.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

In a sample of automobile bodily injury claims, one (1) claims was found to be an early bodily injury settlement in violation of Connecticut General Statutes, Section 52-572 (a).

Homeowners

American Strategic Insurance Corp.

In a sample of homeowner paid claims, one (1) file indicated that recoverable depreciation procedures were not clearly explained to the claimant.

Standard 7: The companies use the reservation of rights and excess of loss letters when appropriate.

The companies appear to be in compliance.

Standard 8: Deductible reimbursement to insureds upon subrogation recovery is made in a timely and accurate manner.

The companies appear to be in compliance.

Standard 9: The companies' claim forms are appropriate for the type of product.

The companies appear to be in compliance.

Standard 10: Claim files are reserved in accordance with the companies' established procedures.

The companies appear to be in compliance.

Standard 11: Denied and closed without payment claims are handled in accordance with policy provisions and State law.

The companies appear to be in compliance.

Standard 12: Cancelled benefit checks and drafts reflect appropriate claim handling procedures.

The companies appear to be in compliance.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

Standard 13: Claim handling practices do not compel claimants to institute litigation, in cases of clear liability and coverage, to recover amounts due under policies by offering substantially less than is due under the policy.

The companies appear to be in compliance.

Standard 14: The companies use licensed adjusters and (Connecticut) appraisers in the handling of casualty claims.

Progressive Direct Insurance Company

A total of three (3) adjusters did not hold required adjusters license in accordance with Connecticut General Statutes, Section 38a-792.

Standard 15: Loss statistical coding is complete and accurate.

The companies appear to be in compliance.

Standard 16: Release by injured person voidable if obtained within fifteen days.

Progressive Direct Insurance Company

The company, in one (1) instance, was not in compliance with Connecticut General Statutes, Section 52-572.

III. SUMMARY OF RECOMMENDATIONS

Report
Section

II. D. Producer Licensing:

New Business

It is required that American Strategic Insurance Corp. comply with Connecticut General Statutes, Section 38a-702m, with regard to agent appointments.

II. F. Underwriting and Rating:

Personal Lines–Automobile Rating

It is required that Progressive Casualty Insurance Company and Progressive Direct Insurance Company comply with Connecticut General Statutes, Section 38a-686-2, with regard to automobile rating.

II. F. Underwriting and Rating:

Automobile Cancellations

It is required that Progressive Casualty Insurance Company and Progressive Direct Insurance Company comply with Connecticut General Statutes, Section 38a-343, with regard to automobile cancellations.

II. F. Underwriting and Rating:

Automobile Cancellations

It is required that Progressive Casualty Insurance Company comply with Connecticut General Statutes, Section 38a-15, with regard to its retention of documentation for non-pay automobile cancellations.

II. F. Underwriting and Rating:

Homeowner-Cancellations

It is required that the American Strategic Insurance Corp. comply with Connecticut General Statutes, Section 38a-323 and Bulletin PC-66, with regard to the cancellation of homeowner policies.

II. F. Underwriting and Rating:

Automobile-Declinations

It is required that the Progressive Casualty Insurance Company comply with Connecticut General Statutes, Sections 38a-15, 38a-323 and Bulletin PC-66, with regard to the declination of automobile policies.

II. F. Underwriting and Rating:

Automobile-Renewals

It is required that the Progressive Casualty Insurance Company and Progressive Direct Insurance Company comply with Connecticut General Statutes, Section 38a-323 and Bulletin PC-66, with regard to the renewal of automobile policies.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

II. F. Underwriting and Rating:

Automobile-Endorsements

It is required that the Progressive Casualty Insurance Company comply with Connecticut General Statutes, Section 38a-15, with regard to the processing of automobile endorsements.

II. G. Claims:

Automobile

It is required that Progressive Casualty Insurance Company and Progressive Direct Insurance Company comply with Connecticut Regulations 38a-334-(2)(c) and 38a-334-(5)(a), with regard to loss of use in the settlement of private passenger automobile property damage liability claims.

II. G. Claims:

Automobile

It is required that Progressive Casualty Insurance Company and Progressive Direct Insurance Company comply with Connecticut General Statutes, Section 38a-816, with regard to the settlement of automobile claims.

II. G. Claims:

Homeowner

It is required that American Strategic Insurance Corp. comply with Connecticut General Statutes, Section 38a-816, with regard to the settlement of homeowner claims.

II. G. Claims:

Automobile

It is required that Progressive Direct Insurance Company comply with Connecticut General Statutes, Section 52-572(a), with regard to the settlement of automobile bodily injury claims.

II. G. Claims:

Automobile-Casualty Claims Adjusters

It is required that Progressive Direct Insurance Company comply with Connecticut General Statutes, Section 38-792, with regard to the licensing of casualty claims adjusters.

Progressive Casualty Insurance Company
Progressive Direct Insurance Company
American Strategic Insurance Corp.

IV. ACKNOWLEDGMENT

The courtesy and cooperation of Progressive Casualty Insurance Company, Progressive Direct Insurance Company and American Strategic Insurance Corp. during the course of this examination is acknowledged.

Mark J. Duffy, Karen A. Romero, Nicholas Gill and James Stowe participated in the examination and preparation of this report.



STATE OF CONNECTICUT

INSURANCE DEPARTMENT

-----X
IN THE MATTER OF:
AMERICAN STRATEGIC
INSURANCE CORP.
-----X

DOCKET MC 20-39

STIPULATION AND CONSENT ORDER

It is hereby stipulated and agreed between American Strategic Insurance Corp. and the State of Connecticut Insurance Department by and through Andrew N. Mais, Insurance Commissioner, to wit:

I

WHEREAS, pursuant to a Market Conduct examination, the Insurance Commissioner alleges the following with respect to American Strategic Insurance Corp.

1. American Strategic Insurance Corp., hereinafter referred to as Respondent, is domiciled in the State of Florida and is licensed to transact property and casualty insurance in the State of Connecticut. The NAIC company code number is 10872.
2. From April 29, 2019 through October 11, 2019, the Department conducted an examination of Respondent's market conduct practices in the State of Connecticut covering the period from July 1, 2017 through June 30, 2018.
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) unappointed individuals or entities acting as producers
4. The conduct described in paragraph three is in violation of Sections 38a-702m of the Connecticut General Statutes, and constitutes cause for the imposition of a fine or other administrative penalty under Sections 38a-2 and 38a-41 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 \$27,000 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 Respondent is fined the sum of Twenty-Seven Thousand Dollars (\$27,000) for the violations herein above described.

AMERICAN STRATEGIC INSURANCE CORP.

By: 

(Representative of Insurance Company)

CERTIFICATION

The undersigned deposes and says that she/he has duly executed this Stipulation and Consent Order on this 30th day of June 2020, for and on behalf of American Strategic Insurance Corp. that she/he is the Secretary of such company, and she/he has authority to execute and file such instrument.

By: [Signature]

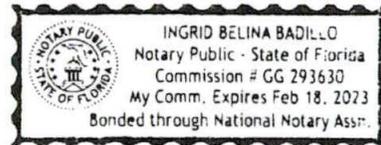
STATE OF Florida

SS

COUNTY OF Pinellas

On the 30th day of June 2020, before me personally appeared Kathleen Sundberg, sealer of the foregoing Stipulation and Consent Order, acknowledged same to be her/his act and deed.

[Signature]
Notary Public/Commissioner of The Superior Court



Section Below To Be Completed by State of Connecticut Insurance Department

Dated at Hartford, Connecticut this 8th day of September 2020.

[Signature]
Andrew N. Mais
Insurance Commissioner