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FILED
MAR 07 2022
Department of Insurance
State of Idaho
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BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

PROPERTY AND CASUALTY
INSURANCE COMPANY OF HARTFORD,
an Indiana-domiciled insurance company
holding Idaho Certificate of Authority No.
2813, NAIC No. 34690;

HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana-domiciled insurance
company holding Idaho Certificate of
Authority No. 1699, NAIC No. 29424;

HARTFORD INSURANCE COMPANY OF
THE MIDWEST, an Indiana-domiciled
insurance company holding Idaho Certificate
of Authority No. 1585, NAIC No. 37478;

Docket No. 18-3955-21

**STIPULATION AND FINAL ORDER
CONSOLIDATING CASES,
IMPOSING ADMINISTRATIVE
PENALTY, AND DISMISSING
ACTION**

HARTFORD ACCIDENT AND INDEMNITY COMPANY, a Connecticut-domiciled insurance company holding Idaho Certificate of Authority No. 297, NAIC No. 22357;

HARTFORD FIRE INSURANCE COMPANY, a Connecticut-domiciled insurance company holding Idaho Certificate of Authority No. 464, NAIC No. 19682;

HARTFORD UNDERWRITERS INSURANCE COMPANY, a Connecticut-domiciled insurance company holding Idaho Certificate of Authority No. 1832, NAIC No. 30104;

TWIN CITY FIRE INSURANCE COMPANY, an Indiana-domiciled insurance company holding Idaho Certificate of Authority No. 1700, NAIC No. 29459;

TRUMBULL INSURANCE COMPANY, a Connecticut-domiciled insurance company holding Idaho Certificate of Authority No. 2820, NAIC No. 27120;

and

SENTINEL INSURANCE COMPANY, LTD, a Connecticut-domiciled insurance company holding Idaho Certificate of Authority No. 3520, NAIC No. 11000,

Respondents.

COME NOW the staff of the Idaho Department of Insurance (“**Department**”) and the above-named Respondents (collectively, the “**Hartford Companies**”) and hereby agree and stipulate as follows:

FINDINGS OF FACT

1. PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD is

an Indiana-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 2813, initially issued on October 20, 1995, and is a member of the Hartford Fire & Casualty Group.

2. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD in Docket No. 18-3955-21.

3. HARTFORD CASUALTY INSURANCE COMPANY is an Indiana-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 1699, initially issued on July 1, 1987, and is a member of the Hartford Fire and Casualty Group.

4. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against HARTFORD CASUALTY INSURANCE COMPANY in Docket No. 18-3956-21.

5. HARTFORD INSURANCE COMPANY OF THE MIDWEST is an Indiana-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 1585, initially issued on December 8, 1983, and is a member of the Hartford Fire & Casualty Group.

6. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against HARTFORD INSURANCE COMPANY OF THE MIDWEST in Docket No. 18-3957-21.

7. HARTFORD ACCIDENT AND INDEMNITY INSURANCE COMPANY is a Connecticut-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 297, initially issued on July 18, 1919, and is a member of the

Hartford Fire & Casualty Group.

8. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against HARTFORD ACCIDENT AND INDEMNITY INSURANCE COMPANY in Docket No. 18-3958-21.

9. HARTFORD FIRE INSURANCE COMPANY is a Connecticut-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 464, initially issued on July 29, 1919, and is a member of the Hartford Fire & Casualty Group.

10. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against HARTFORD FIRE INSURANCE COMPANY in Docket No. 18-3959-21.

11. HARTFORD UNDERWRITERS INSURANCE COMPANY is a Connecticut-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 1832, initially issued on July 1, 1988, and is a member of the Hartford Fire & Casualty Group.

12. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against HARTFORD UNDERWRITERS INSURANCE COMPANY in Docket No. 18-3960-21.

13. TWIN CITY FIRE INSURANCE COMPANY is an Indiana-domiciled insurer authorized to transact insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 1700, initially issued on July 1, 1987, and is a member of the Hartford Fire & Casualty Group.

14. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against TWIN CITY FIRE INSURANCE COMPANY in Docket No. 18-3961-21.

15. TRUMBULL INSURANCE COMPANY is a Connecticut-domiciled insurer authorized to transact casualty including workers compensation; marine and transportation; surety; and property insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 2820, initially issued on November 8, 1995, and is a member of the Hartford Fire & Casualty Group.

16. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against TRUMBULL INSURANCE COMPANY in Docket No. 18-3962-21.

17. SENTINEL INSURANCE COMPANY LTD is a Connecticut-domiciled insurer authorized to transact certain lines of insurance in the state of Idaho pursuant to Idaho Certificate of Authority No. 3520, initially issued on February 4, 2004, and is a member of the Hartford Fire & Casualty Group.

18. On September 29, 2021, the Department filed a Verified Complaint and Notice of Right to Hearing against SENTINEL INSURANCE COMPANY LTD in Docket No. 18-3963-21.

19. The Director of the Department (“**Director**”) has jurisdiction over the Hartford Companies and the subject matter herein pursuant to provisions of the Idaho Insurance Code, Idaho Code §§ 41-101 *et seq.*

AGREEMENT

20. The Hartford Companies and the Department stipulate and agree that this matter may be brought to a close by a negotiated and stipulated settlement as follows:

- a. For purposes of settlement, the individual administrative cases brought by the Department against the Hartford Companies individually shall be consolidated under Docket No. 18-3955-21.
- b. The Hartford Companies admit to violating Idaho Code § 41-1812(1) by failing to file certain insurance policy forms with the Department prior to use as required and

wish to enter into this stipulated settlement to resolve the allegations set forth in the above-referenced Verified Complaints.

- c. The Hartford Companies agree to pay to the Department a total administrative penalty in the amount of \$360,000, for which the Hartford Companies are jointly and severally liable.
- d. The administrative penalty is due in full within 30 days of entry of the Final Order approving this Stipulation.
- e. Upon the Department's receipt of the administrative penalty in full, this consolidated matter, comprising the individual administrative cases against each Respondent, shall be dismissed.
- f. In the event the administrative penalty is not paid in full within 30 days of entry of the Final Order approving this Stipulation, the individual administrative cases against each Respondent shall be set for hearing before the Director or his duly-appointed hearing officer.
- g. The undersigned hereby warrant and affirm that each has the authority to bind the respective above-named parties in the above-entitled action, namely Idaho Department of Insurance Docket No. 18-3955-21.

21. By entering into this Stipulation, the Hartford Companies knowingly and voluntarily waive any rights they would otherwise have to notice and a hearing at which they may be represented by counsel, present evidence, and examine witnesses. The parties hereto further waive their right of reconsideration, appeal, and other rights as set forth in title 67, chapter 52, Idaho Code, including the right to submit this matter for review by a court of competent jurisdiction.

22. The parties agree that the terms of this Stipulation are appropriate and proper under the circumstances referenced herein, and agree that the Director may enter the Final Order approving the same.

23. The Hartford Companies acknowledge that they have read this Stipulation and understands its contents; that they have been given the opportunity to discuss this Stipulation with independent legal counsel of their choosing; and that they have entered into this Stipulation knowingly, voluntarily, and with full knowledge of any rights they may be waiving thereby.

24. This Stipulation is subject to approval by the Director, and shall become effective and binding upon the Department and the Hartford Companies upon such approval. Should the Director decline to approve this Stipulation, the Department and the Hartford Companies shall retain all of their rights, claims and/or defenses, and any factual and/or legal admissions made by the Hartford Companies herein shall be withdrawn.

25. This Stipulation constitutes the full and final resolution of all matters addressed herein, and the Department agrees that, subject to the Director's approval described above, the Department shall seek no further civil or administrative sanctions for the violations alleged, subject to the agreement set forth in Paragraph 20 above.

26. The Hartford Companies agree that, upon execution of this Stipulation and the Final Order approving the same, no subsequent action or assertion shall be maintained or pursued in any manner asserting the invalidity of this Stipulation and Final Order.

27. This Stipulation embodies the entire agreement between the Department and the Hartford Companies, and there are no agreements, understandings, representations, or warranties that are not expressly set forth herein.

28. Upon the Director's entry of the Final Order approving this Stipulation, this Stipulation and Final Order shall be a public record under the Idaho Public Records Act.

AGREED this 3rd day of March, 2022.

For and on behalf of the above-named Insurers and on behalf of The Hartford

DocuSigned by:
Charlene Ridgeway
By: Charlene A Ridgeway
Its: Chief Ethics and Compliance Officer

Approved as to Form:

DocuSigned by:
Amy Hudson
24CA51427167418
Amy T. Hudson
Managing Associate General Counsel
The Hartford

AGREED this 7th day of March, 2022.

STATE OF IDAHO
DEPARTMENT OF INSURANCE

By: Shannon Hoehl
SHANNON HOHL
Bureau Chief
Market Oversight Bureau

Approved as to Form:

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: John C. Keenan
John C. Keenan
Deputy Attorney General
Attorney for the Department of Insurance

FINAL ORDER

The parties hereto, having entered into the foregoing Stipulation, and the form of the order having been approved, the Director, having reviewed the same, does hereby find that there is a factual basis for entry of a Final Order herein.

NOW, THEREFORE, based on the foregoing and in consideration of the premises,

IT IS HEREBY ORDERED that the foregoing Stipulation is approved and is incorporated herein as if set forth in full and made a part hereof.

IT IS FURTHER ORDERED that the individual administrative cases brought by the Department against the Hartford Companies individually, as detailed in the Stipulation, are consolidated under Docket No. 18-3955-21.

IT IS FURTHER ORDERED that the Hartford Companies shall pay to the Department, within 30 days of entry of this Final Order, an administrative penalty in the total amount of \$360,000, for which the Hartford Companies are jointly and severally liable.

IT IS FURTHER ORDERED that, upon the Department's receipt of the foregoing administrative penalty in full, this consolidated matter, comprising the individual administrative cases against each Respondent, shall be DISMISSED without further order.

IT IS FURTHER ORDERED that, in the event the administrative penalty is not paid in full within 30 days of entry of this Final Order, the individual administrative cases against each Respondent shall be set for hearing before the Director or his duly-appointed hearing officer.

DATED this 7th day of March, 2022.

STATE OF IDAHO
DEPARTMENT OF INSURANCE



DEAN L. CAMERON
Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 7th day of March, 2022, I caused a true and correct copy of the foregoing, fully-executed STIPULATION AND FINAL ORDER CONSOLIDATING CASES, IMPOSING ADMINISTRATIVE PENALTY, AND DISMISSING ACTION to be served upon the following by the designated means:

Amy T. Hudson
Managing Associate General Counsel
The Hartford
One Hartford Plaza, HO-1-09
Hartford, CT 06155

- first class mail
- certified mail
- hand delivery
- via facsimile

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Deputy Attorney General
Idaho Department of Insurance
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- first class mail
- certified mail
- hand delivery
- via facsimile


Pamela Murray