



JB Pritzker
Governor

Illinois Department of Insurance

Dana Popish Severinghaus
Director

VIA ELECTRONIC MAIL

January 4, 2023

Mr. David Gross, President
c/o Jill Uitenbroek
Secura Insurance Company
1500 Mutual Way
Neenah, WI. 54956

Re: Secura Insurance Company, NAIC 22543
Secura Supreme Insurance Company, NAIC 10239
Market Conduct Examination Report Closing Letter

Dear Mr. Gross:

The Department has received your Company's proof of compliance. Therefore, the Department is closing its file on this exam.

I intend to ask the Director to make the Examination Report and Stipulation and Consent Order available for public inspection as authorized by 215 ILCS 5/132. At the Department's discretion, specific content of the report may be subject to redaction for private, personal, or trade secret information prior to making the report public. However, any redacted information will be made available to other regulators upon request.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Erica Weyhenmeyer".

Erica Weyhenmeyer
Chief Market Conduct Examiner
Illinois Department of Insurance
320 West Washington St., 5th Floor
Springfield, IL 62767
Phone: 217-782-1790
E-mail: Erica.Weyhenmeyer@Illinois.gov

ILLINOIS DEPARTMENT OF INSURANCE
MARKET CONDUCT EXAMINATION

SECURA INSURANCE COMPANY
SECURA SUPREME INSURANCE COMPANY

MARKET CONDUCT EXAMINATION REPORT

DATE OF EXAMINATION: June 28, 2021 to April 30, 2022

EXAMINATION OF: Secura Insurance Company (NAIC #22543)
Secura Supreme Insurance Company (NAIC #10239)

LOCATION OF EXAMINATION: 1500 Mutual Way
Neenah, WI 54956

PERIOD COVERED BY
EXAMINATION: May 1, 2020 through April 30, 2021
(Complaints were reviewed for the period
December 1, 2019 through April 30, 2021)

EXAMINERS:
MCM

Craig L. Leonard, CIE, CPCU, CCP, FLMI, ARC, AIAF, ARM,
Willa Burroughs, MCM
Tina Campbell, CIE, AIRC
Frank Fricks, CIE, CFE, FLMI, AIRC
Greg Hawkins
Nicholas Klug, JD, AIE, AMCM, AIRC
Michele Lee, MCM
Joan McClain, CIE, MCM, FLMI, AIRC
Mike Woolbright, CIE, MBA, ALHC, MCM

TABLE OF CONTENTS

I.	SUMMARY.....	1
II.	BACKGROUND.....	13
III.	METHODOLOGY	15
IV.	FINDINGS.....	19
	A. Complaint Handling	19
	1. DOI Complaints.....	19
	2. Consumer Complaints.....	19
	B. Marketing and Sales	19
	1. Company-generated Marketing.....	19
	2. Producer Training Materials	19
	C. Risk Selection.....	19
	1. PPA Cancellations – Less than 60 days.....	19
	2. PPA Cancellations – Greater than 60 days.....	19
	3. PPA Nonrenewals.....	19
	4. PPA Declinations.....	19
	5. HO Cancellations – Less than 60 days	19
	6. HO Cancellations – Greater than 60 days.....	19
	7. HO Nonrenewals.....	19
	8. HO Declinations	19
	9. DF Cancellations – Less than 60 days.....	19
	11. DF Nonrenewals.....	19
	12. FO Cancellations – Less than 60 days.....	19
	13. FO Cancellations – Greater than 60 days.....	20
	14. FO Nonrenewals.....	20
	15. FO Declinations.....	20
	16. CMP Cancellations – Less than 60 days.....	20
	17. CMP Cancellations – Greater than 60 days.....	20
	18. CMP Nonrenewals.....	20
	19. CMP Declinations.....	20
	20. CA Cancellations – Less than 60 days.....	20
	21. CA Cancellations – Greater than 60 days	20
	22. CA Nonrenewals.....	21
	23. CA Declinations.....	21
	24. WC Cancellations – Less than 60 days.....	21
	25. WC Cancellations – Greater than 60 days	21
	26. WC Nonrenewals.....	21
	27. WC Declinations.....	21
	D. Underwriting and Rating.....	21
	1. PPA New Business	21
	2. PPA Renewals	23
	3. HO New Business.....	23
	4. HO Renewals.....	23
	5. DF New Business.....	23
	6. DF Renewals	23
	7. FO New Business.....	23
	8. FO Renewals	24
	9. CMP New Business	24
	10. CMP Renewals	25
	11. CA New Business.....	25
	12. CA Renewals	25
	13. WC New Business	26
	14. WC Renewals	26
	E. Claims.....	27
	1. PPA First-Party Paid.....	27
	2. PPA First-Party Closed Without Payment.....	27
	3. PPA Total Loss.....	27
	4. PPA Third-Party Paid.....	27
	5. PPA Third-Party Closed Without Payment.....	27

6.	PPA Subrogation.....	27
7.	HO Paid.....	27
8.	HO Closed Without Payment.....	28
9.	DF Paid	28
10.	DF Closed Without Payment.....	28
11.	FO Paid	28
12.	FO Closed Without Payment.....	28
13.	CMP Paid	29
14.	CMP Closed Without Payment.....	29
15.	CA Paid	29
16.	CA Closed Without Payment.....	29
17.	WC Paid	30
18.	WC Closed Without Payment.....	30

I. SUMMARY

A comprehensive market conduct examination of Secura Insurance Company (NAIC #22543) and Secura Supreme Insurance Company (NAIC #10239), (herein referred to as “Companies”) was performed to determine compliance with Illinois Statutes and the Illinois Administrative Code.

The lines of business under review included Private Passenger Automobile (“PPA”), Homeowners (“HO”), Dwelling Fire (“DF”), Farmowners (“FO”), Commercial Multiple Peril (“CMP”), Commercial Automobile (“CA”), and Workers’ Compensation (“WC”).

The following represents general findings from issued criticisms; however, specific details are found in each section of the report.

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
1	215 ILCS 5/143.25a	Underwriting and Rating – Private Passenger Auto Renewals: Companies failed to provide notice of availability of higher deductibles.	D.2	115	12	10.40%
2	50 Ill. Adm. Code 8010.20(b)	Underwriting and Rating – Private Passenger Auto Renewals: Companies failed to display “ILLINOIS INSURANCE CARD” on the top of the front of the insurance card.	D.2	115	115	100%
5	215 ILCS 157/40 and 50 Ill. Adm. Code 754.10(a) and (b)	Underwriting and Rating – Private Passenger Auto New Business: Companies failed to file the Attract One scoring model.	D.1	84	n/a	n/a
6	215 ILCS 157/40 and 50 Ill. Adm. Code 754.10(a) and (b)	Underwriting and Rating – Private Passenger Auto New Business: Secura Insurance Company failed to file the CP Attract HO-3 insurance scoring model.	D.1	84	n/a	n/a
7	215 ILCS 157/40 and 50 Ill. Adm. Code 754.10(a) and (b)	Underwriting and Rating – Private Passenger Auto New Business: Secura Supreme Insurance Company failed to file the CP Attract HO-3 insurance scoring model.	D.1	84	n/a	n/a
8	215 ILCS 5/143.11	Risk Selection – Commercial Auto Cancellations greater than 60 days: Companies failed to provide the insured with 10 days’ written notice of cancellation.	C.21	79	1	1.30%
9	215 ILCS 5/805.1(a)	Underwriting and Rating – Homeowners Renewals: Companies failed to provide signed Mine Subsidence Waivers.	D.4	115	2	1.70%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
10	215 ILCS 5/805.1(a)	Underwriting and Rating – Dwelling Fire Renewals: Companies failed to provide signed Mine Subsidence Waivers.	D.6	79	4	5.10%
11	215 ILCS 5/143.10a (1)	Risk Selection – Commercial Auto Nonrenewals: Companies failed to provide the first named insured with loss information at the time of the notice of nonrenewal.	C.22	51	11	21.60%
12	215 ILCS 5/805.1(a)	Underwriting and Rating – Commercial Multiple Peril Renewals: Companies failed to provide signed Mine Subsidence Waivers.	D.10	115	5	4.30%
13	215 ILCS 5/805.1(a)	Underwriting and Rating – Farmowners Renewals: Companies failed to provide a Mine Subsidence Waiver executed prior to the renewal date.	D.8	84	1	1.20%
16	215 ILCS 5/805.1(a)	Underwriting and Rating – Dwelling Fire New Business: Companies failed to provide signed Mine Subsidence Waivers.	D.5	16	2	12.50%
17	215 ILCS 5/143.11	Risk Selection – Commercial Auto Cancellation greater than 60 days: Companies failed to provide 10 days' written notice of cancellation for nonpayment of premiums to the loss payee.	C.21	79	1	1.30%
19	215 ILCS 5/143.17e	Risk Selection – Farmowners Nonrenewals: Companies failed to include a specific explanation in the notice of intention not to renew coverage to the first named insured.	C.14	1	1	100%
20	215 ILCS 5/143.23	Risk Selection – Farmowners Nonrenewals: Companies failed to include the Right of Appeal in the notice of intention not to renew.	C.14	1	1	100%
21	215 ILCS 5/155.17	Underwriting and Rating – Private Passenger Auto New Business: Companies bodily injury liability rates deviated from the remaining Chicago territories.	D.1	84	6	7.10%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
22	215 ILCS 5/143.17a	Risk Selection – Workers’ Compensation Nonrenewals: Companies failed to provide written notice to the insured that included the specific explanation of the reason of nonrenewal.	C.26	44	4	9.10%
23	215 ILCS 5/143.23	Risk Selection – Workers’ Compensation Nonrenewals: Companies failed to advise the insured of the right to request a hearing.	C.26	44	15	34.10%
26	215 ILCS 5/423(1)	Underwriting and Rating – Private Passenger Auto New Business: Companies failed to apply or verify for the Early Quote Discount.	D.1	84	1	1.20%
27	50 Ill. Adm. Code 8010.20(b)	Underwriting and Rating – Private Passenger Auto New Business: Companies failed to display “ILLINOIS INSURANCE CARD” on the top of the front of the insurance card.	D.1	84	84	100%
28	215 ILCS 5/143.27	Risk Selection – Homeowners Nonrenewals: Companies failed to give reasonable period of time to repair defects.	C.7	72	1	1.40%
32	215 ILCS 5/805.1(a)	Underwriting and Rating – Homeowners New Business: Companies failed to provide signed Mine Subsidence Waivers.	D.3	84	2	2.40%
33	50 Ill. Adm. Code 754.10	Underwriting and Rating – Dwelling Fire New Business: Companies failed to remove a woodstove surcharge after being notified that the woodstove was removed.	D.5	16	1	6.30%
40	215 ILCS 5/143.17a	Risk Selection – Commercial Auto Nonrenewal: Companies failed to provide written notice with the specific explanation for the nonrenewal to the insured.	C.22	51	10	19.60%
41	215 ILCS 5/143.23	Risk Selection – Commercial Auto Nonrenewal: Companies failed to include the Right of Appeal in the nonrenewal notice.	C.22	51	10	19.60%
50	215 ILCS 5/143.23	Risk Selection – Commercial Multiple Peril Nonrenewal: Companies failed to include the Right of Appeal in the cancellation notice.	C.18	65	20	30.80%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
51	215 ILCS 5/143.10a (1)	Risk Selection – Commercial Multiple Peril Nonrenewal: Companies failed to provide loss information with the nonrenewal notice.	C.18	65	20	30.80%
52	215 ILCS 5/143.22	Risk Selection – Commercial Multiple Peril Nonrenewal: Companies failed to include the FAIR Plan Eligibility in the cancellation notice.	C.18	65	1	1.50%
53	215 ILCS 5/143.17a (a)	Risk Selection – Commercial Multiple Peril Nonrenewal: Companies failed to provide a specific explanation of the reason for nonrenewal.	C.18	65	14	21.50%
57	215 ILCS 5/143(2) and 753.10(a) (1)	Underwriting and Rating – Workers’ Compensation New Business: Companies issued a policy with a form that had been withdrawn for use by the NCCI and not subsequently filed.	D.13	84	1	1.20%
59	215 ILCS 5/457(1) and 215 ILCS 5/462b.	Underwriting and Rating – Workers’ Compensation New Business: Companies did not retain evidence in the file to support the applied scheduled debits or credits.	D.13	84	22	26.20%
60	215 ILCS 5/143(2)	Underwriting and Rating – Workers’ Compensation New Business: Companies did not attach form #PLI 4001 2101 to the policies.	D.13	84	3	3.60%
63	215 ILCS 5/143.12a	Risk Selection – Private Passenger Auto Cancellations greater than 60 days: Companies failed to return the correct amount to the insured.	C.2	86	1	1.20%
64	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Farmowners Closed Without Payment: Companies failed to provide a reasonable written explanation for the delay in the delay letter.	E.13	32	7	21.90%
65	50 Ill. Adm. Code 919.50(a) (1)	Claims – Farmowners Closed Without Payment: Companies failed to include the Notice of Availability of Department of Insurance in the denial letter.	E.13	32	1	3.10%
67	50 Ill. Adm. Code 919.80(d)(7)(B)	Claims – Farmowners Paid: Companies’ delay letter failed to provide a reasonable explanation for the delay.	E.12	98	24	24.50%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
68	50 Ill. Adm. Code 919.50(a) (1)	Claims – Farmowners Paid: Companies failed to provide the denial letter within 30 days after the investigation and determination of liability was completed.	E.12	98	1	1.00%
69	50 Ill. Adm. Code 919.50(a)	Claims – Farmowners Paid: Companies failed to offer payment within 30 days after affirmation of liability.	E.12	98	3	3.10%
70	215 ILCS 5/397.1(a)	Claims – Farmowners Paid: Companies paid a claim for loss by fire in excess of \$25,000 and failed to receive the required certificate.	E.12	98	1	1.00%
71	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Farmowners Paid: Companies failed to send a delay letter to the insured.	E.12	98	3	3.10%
74	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Auto New Business: Companies failed to assign vehicles to the proper rating territory based on the garage location.	D.11	84	3	3.60%
76	215 ILCS 5/143a-2	Underwriting and Rating – Commercial Auto New Business: Companies failed to provide evidence insureds were advised of the right to reject uninsured/underinsured motorist coverage in excess of the minimum limits.	D.11	84	20	23.80%
77	50 Ill. Adm. Code 919.80(b) (2)	Claims – Private Passenger Auto First-Party Paid: Companies failed to provide a reasonable written explanation for the delay in the delay letters.	E.1	105	2	1.90%
78	50 Ill. Adm. Code 919.50(a)	Claims – Private Passenger Auto First-Party Paid: Companies failed to offer payment within 30 days after affirmation of liability.	E.1	105	5	4.80%
79	50 Ill. Adm. Code 919.80(b) (2)	Claims – Private Passenger Auto First-Party Paid: Companies failed to send delay letters to the insured.	E.1	105	4	3.80%
80	215 ILCS 5/143a-2	Underwriting and Rating – Commercial Auto New Business: Companies failed to provide evidence the insured rejected uninsured/underinsured motorist coverage in an amount equal to the bodily injury liability limits.	D.11	84	1	1.20%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
81	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Auto New Business: Companies failed to utilize the proper primary classification for the size class or radius of vehicle operation.	D.11	84	2	2.40%
83	215 ILCS 5/143.17a	Underwriting and Rating – Workers' Compensation Renewals: Companies failed to provide 60 days' notice when there was an increase in premium of 30% or more upon renewal.	D.14	113	1	0.90%
84	215 ILCS 5/457(1) and 215 ILCS 5/462b	Underwriting and Rating – Workers' Compensation Renewals: Companies' file documentation for schedule rating factors were not based on the filed schedule rating plan risk characteristics.	D.14	113	8	7.10%
85	215 ILCS 5/457(1)	Underwriting and Rating – Workers' Compensation Renewals: Companies failed to retain evidence to support the applied scheduled debits or credits.	D.14	113	20	17.70%
86	215 ILCS 5/457(1) and 215 ILCS 5/462b	Underwriting and Rating – Workers' Compensation Renewals: Companies' schedule rating documentation for changes from the prior year do not match the factors on the declaration pages for the prior policy term.	D.14	113	11	9.70%
87	215 ILCS 5/457(1)	Underwriting and Rating – Workers' Compensation Renewals: Companies failed to maintain documentation sufficient to support factor changes.	D.14	113	49	43.40%
88	215 ILCS 5/457(1) and 215 ILCS 5/462b	Underwriting and Rating – Workers' Compensation Renewals: Companies' file documentation for the schedule rating factors did not match the declarations.	D.14	113	8	7.10%
89	215 ILCS 5/457(1) and 215 ILCS 5/462b	Underwriting and Rating – Workers' Compensation Renewals: Companies applied credits/debits that were not based on the filed scheduled rating plan risk characteristics.	D.14	113	4	3.50%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
90	215 ILCS 5/143(2) and 50 Ill. Adm. Code 753.10(a)(3)	Underwriting and Rating – Workers’ Compensation Renewals: Companies failed to attach a disclosure form to the policies.	D.14	113	8	7.10%
91	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Auto New Business: Companies failed to apply the Loss Cost Multiplier to the garage keepers.	D.11	84	2	2.40%
93	50 Ill. Adm. Code 919.80(b)(2)	Claims – Private Passenger Auto First Party Closed Without Payment: Companies failed to provide a reasonable written explanation for the delay in the delay letters.	E.2	58	7	12.10%
94	50 Ill. Adm. Code 919.50(a)(1)	Claims – Private Passenger Auto First-Party Closed Without Payment: Companies failed to include the Notice of Availability of the Department of Insurance in the denial letters.	E.2	58	2	3.40%
95	50 Ill. Adm. Code 919.50(a)(1)	Claims – Private Passenger Auto First-Party Closed Without Payment: Companies failed to include the applicable policy language upon which the denial is based in the denial letter.	E.2	58	1	1.70%
96	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Auto New Business: Companies applied a renewal reward to a new policy.	D.11	84	1	1.20%
97	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Auto New Business: Companies failed to apply the appropriate non-franchised factor.	D.11	84	1	1.20%
98	215 ILCS 5/423(1)	Underwriting and Rating – Farmowners New Business: Companies misclassified a farm building on building type and insurance to value as defined in the rules.	D.7	79	1	1.30%
99	215 ILCS 5/423(1)	Underwriting and Rating – Farmowners New Business: Companies utilized a formula differing from the method specified on the Illinois Liability Rates page.	D.7	79	35	44.30%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
100	215 ILCS 5/423(1)	Underwriting and Rating – Farmowners New Business: Companies used a rating procedure inconsistent with published rates and rules.	D.7	79	8	10.10%
102	820 ILCS 305/19(o)	Claims – Workers’ Compensation Paid: Companies failed to provide reports by the 15th of each month.	E.18	82	82	100%
104	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Dwelling Fire Closed Without Payment: Companies failed to provide a reasonable written explanation for the delay in the delay letter.	E.11	12	1	8.30%
105	215 ILCS 5/397.1(a)	Claims – Homeowners Paid: Companies paid a claim for loss by fire in excess of \$25,000 and failed to receive the required certificate.	E.8	82	1	1.20%
106	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Homeowners Paid: Companies failed to send a delay letter to the insured.	E.8	82	2	2.40%
107	50 Ill. Adm. Code 919.50(a) (1)	Claims – Homeowners Paid: Companies failed to provide a reasonable written explanation as to why the settlement amount was less than the amount claims.	E.8	82	2	2.40%
108	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Commercial Multiple Peril Paid: Companies delay letters failed to provide a reasonable written explanation for the delay.	E.14	82	3	3.70%
109	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Commercial Multiple Peril Paid: Companies failed to send a delay letter to the insured.	E.14	82	1	1.22%
110	215 ILCS 5/397.1(a)	Claims – Commercial Multiple Peril Paid: Companies paid a claim for loss by fire in excess of \$25,000 and failed to receive the required certificate.	E.14	82	1	1.20%
111	215 ILCS 5/154.6(d)	Claims – Dwelling Fire Paid: Companies issued a claim payment in an incorrect amount.	E.10	10	1	10.00%
112	820 ILCS 305/8.2(d) (3)	Claims – Workers’ Compensation Paid: Companies failed to issue payments to providers within 30 days of receiving a valid bill and interest was not paid for the delayed payment.	E.18	82	11	13.40%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
113	50 Ill. Adm. Code 919.80(d) (7)(B)	Claims – Homeowners Closed Without Payment: Companies failed to provide a reasonable written explanation for the delay in the delay letters.	E.9	87	17	19.50%
114	50 Ill. Adm. Code 919.50(a) (1)	Claims – Homeowners Closed Without Payment: Companies denial letter failed to include the Notice of Availability of the Department of Insurance.	E.9	87	2	2.30%
116	50 Ill. Adm. Code 919.80(b) (2)	Claims – Private Passenger Auto First-Party Total Loss: Companies failed to provide a reasonable written explanation for the delay in the delay letters.	E.3	43	2	4.70%
117	50 Ill. Adm. Code 919.80(b) (2)	Claims – Private Passenger Auto First Party Total Loss: Companies failed to send delay letters.	E.3	43	1	2.30%
118	50 Ill. Adm. Code 919.80(c)	Claims – Private Passenger Auto First-Party Total Loss: Companies failed to send Exhibit A letter.	E.3	43	3	7.00%
121	820 ILCS 305/19(o)	Claims – Workers' Compensation Closed Without Payment: Companies failed to provide reports by the 15th of each month.	E.19	49	24	49.00%
125	215 ILCS 5/154.6(d)	Claims – Private Passenger Auto First-Party Total Loss: Companies issued claim payment in an incorrect amount.	E.3	43	1	2.30%
126	50 Ill. Adm. Code 919.50(a) (1)	Claims – Commercial Multiple Peril Closed Without Payment: Companies failed to include the Notice of Availability of the Department of Insurance in the denial letters.	E.15	76	1	1.31%
127	50 Ill. Adm. Code 919.50(a) (1)	Claims – Commercial Auto Closed Without Payment: Companies failed to include the Notice of Availability of the Department of Insurance in the denial letters.	E.17	76	1	1.30%
128	50 Ill. Adm. Code 919.80(b) (3)	Claims – Commercial Auto Closed Without Payment: Companies failed to send a delay letter.	E.17	76	1	1.30%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
129	50 Ill. Adm. Code 919.80(b) (2)	Claims – Commercial Auto Closed Without Payment: Companies failed to include the Notice of Availability of the Department of Insurance in the delay letter.	E.17	76	1	1.30%
130	50 Ill. Adm. Code 919.80(b) (3)	Claims – Commercial Auto Closed Without Payment: Companies failed to include the Notice of Availability of the Department of Insurance in the delay letter.	E.17	76	1	1.30%
131	50 Ill. Adm. Code 919.80(b) (2)	Claims – Commercial Auto Paid: Companies failed to provide a reasonable written explanation for the delay in the delay letters.	E.16	105	3	2.90%
133	50 Ill. Adm. Code 919.50(a)	Claims – Commercial Auto Paid: Companies failed to offer payment within 30 days after affirmation of liability.	E.16	105	1	1.00%
134	50 Ill. Adm. Code 919.80(b) (2)	Claims – Commercial Auto Paid: Companies failed to send a delay letter to the insured.	E.16	105	1	1.00%
135	50 Ill. Adm. Code 919.80(c)	Claims – Commercial Auto Paid: Companies failed to send an Exhibit A letter on total losses.	E.16	105	2	1.90%
136	215 ILCS 5/154.6(b)	Claims – Commercial Auto Paid: Companies failed to respond to an Arbitration Forums filing.	E.16	105	1	1.00%
137	50 Ill. Adm. Code 919.80(b) (3)	Claims – Private Passenger Auto Third Party Closed Without Payment: Companies failed to send delay letter to third-party claimants.	E.5	42	2	4.80%
139	215 ILCS 5/132 and 215 ILCS 5/133	Underwriting and Rating – Private Passenger Auto New Business: Companies failed to retain verifiable records necessary to validate the policy rating.	D.1	84	1	1.20%
141	215 ILCS 5/808.1	Underwriting and Rating – Commercial Multiple Peril New Business: Companies nonrenewed property with exposure to mine subsidence without evidencing that unrepaired damage existed or if any such damage had been repaired.	D.9	113	1	0.90%

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
142	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Multiple Peril New Business: Companies failed to follow its manual rating procedures by targeting competitors premiums resulting in unfairly discriminatory pricing.	D.9	113	5	4.40%
143	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Multiple Peril New Business: Companies filing to remove ISO's Rule 70 resulted in the inability to properly rate policies according to the Companies' filed BPP rating rules.	D.9	113	General	General
144	215 ILCS 5/143.17e	Underwriting and Rating – Commercial Multiple Peril New Business: Companies failed to include a specific explanation in the notice of intention not to renew coverage.	D.9	113	1	0.90%
145	50 Ill. Adm. Code 919.80(c)	Claims – Commercial Auto Paid: Companies failed to send Exhibit A letter on a total loss claim.	E.16	105	1	1.00%
146	215 ILCS 5/423(1)	Underwriting and Rating – Commercial Multiple Peril New Business: Companies failed to apply the Commercial Property and Commercial General Liability Property rates in effect on the policy effective date.	D.9	113	1	0.90%
147	215 ILCS 5/143.12a	Risk Selection – Private Passenger Auto Cancellations greater than 60 days: Companies failed to return the correct amount of unearned premiums to the insured.	C.2	86	4	4.70%
148	50 Ill. Adm. Code 754.10	Underwriting and Rating – Homeowners New Business: Companies implemented ISO's Home – Risk Analyzer Environmental Module without proper notice to the Illinois Department of Insurance.	D.3	84	General	General

TABLE OF TOTAL VIOLATIONS						
Crit #	Statute/ Rule	Description of Violation	Findings	Files Reviewed	# of Violations	Error %
149	50 Ill. Adm. Code 754.10	Underwriting and Rating – Private Passenger Auto New Business: Companies implemented ISO’s Personal Auto – Risk Analyzer Personal Auto Environmental Module without proper notice to the Illinois Department of Insurance.	D.1	84	General	General
150	50 Ill. Adm. Code 754.10	Underwriting and Rating – Private Passenger Auto New Business: Companies implemented ISO’s Personal Auto Model Year and Symbol Program but did not file the ISO program.	D.1	84	General	General

II. BACKGROUND

The examination is of Secura Insurance Company (NAIC #22543) and Secura Supreme Insurance Company (NAIC #10239), (herein referred to as “Companies”).

Secura Insurance Company is a Wisconsin-domiciled insurance company, founded in 1900 as the Farmers Home Mutual Hail, Tornado and Cyclone Insurance Company of Seymour, Wisconsin, a town mutual insurance company. In 1932, the Company converted to a Wisconsin-domiciled mutual insurer and shortened its name to Home Mutual Insurance Company. In 1986, the Company changed its name to Secura Insurance, A Mutual Company. Effective January 1, 2021, the Company was converted to a stock insurance company and changed its name to Secura Insurance Company under an approved mutual holding company restructuring, and is now a wholly-owned subsidiary of Secura Holdings, Inc., which is a wholly-owned subsidiary of Secura Insurance Mutual Holding Company.

Secura Supreme Insurance Company was formed in 1995 under the laws of the state of Wisconsin as a wholly-owned stock subsidiary of Secura Insurance, A Mutual Company (n/k/a Secura Insurance Company).

As of December 31, 2020, the Companies held Certificates of Authority to write insurance in 27 states, but actively write business in 12 states: Arizona, Colorado, Illinois, Indiana, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri, North Dakota and Wisconsin. Secura Insurance Company received its Certificate of Authority from Illinois in 1979 (and began actively writing in 1995) and Secura Supreme Insurance Company received its Certificate of Authority from Illinois in 2003.

As of December 31, 2020, the Companies’ written premiums in Illinois for the lines of business subject to the scope of this examination were as follows:

Secura Insurance Company						
Line of Business	Direct Premiums Written (\$)	Direct Premiums Earned (\$)	Direct Unearned Premium (\$)	Direct Losses Paid (\$)	Direct Losses Incurred (\$)	Direct Losses Unpaid (\$)
PPA Liability	113,999	99,558	56,085	6,752	9,129	26,324
PPA Physical Damage	144,385	123,041	68,065	42,230	41,998	-3,231
Homeowners	4,755	5,122	-2,046	1,406	1,978	-1,144
Farmowners	5,161,763	4,901,631	2,596,702	2,910,364	2,321,306	1,073,748
Dwelling Fire	173,245	173,236	82,795	500	-8,376	5,759
Commercial Multiple Peril (non-liability)	7,547,967	7,078,307	3,614,286	5,376,591	7,478,411	4,949,800
Commercial Multiple Peril (liability)	7,013,984	6,649,882	3,363,191	2,239,151	1,876,970	6,986,443
Commercial Auto Liability	11,555,266	10,743,375	5,537,968	4,169,706	4,472,226	8,958,795
Commercial Auto Physical Damage	4,763,505	4,285,769	2,211,931	2,264,802	2,287,802	109,411
Workers' Compensation	15,606,127	15,010,001	59,122	6,860,546	6,889,806	7,186,500
Totals	52,084,996	49,069,922	17,588,099	23,872,048	25,371,250	29,292,405

Secura Supreme Insurance Company						
Line of Business	Direct Premiums Written (\$)	Direct Premiums Earned (\$)	Direct Unearned Premium (\$)	Direct Losses Paid (\$)	Direct Losses Incurred (\$)	Direct Losses Unpaid (\$)
PPA Liability	2,501,000	2,571,842	1,243,067	1,490,778	1,037,194	2,206,396
PPA Physical Damage	2,272,315	2,388,725	1,098,631	1,054,134	1,068,815	-58,831
Homeowners	3,272,125	3,322,902	1,613,757	3,113,981	3,137,435	799,619
Farmowners	0	0	0	0	0	0
Dwelling Fire	827	826	241	0	14	28
Commercial Multiple Peril (non-liability)	36,140	35,364	20,597	0	-834	1,971
Commercial Multiple Peril (liability)	14,304	19,013	6,548	0	-443	10,565
Commercial Auto Liability	14,510	14,281	9,167	0	-3,073	9,068
Commercial Auto Physical Damage	6,496	6,245	4,230	429	427	-45
Workers' Compensation	317,269	289,614	73,098	269,926	473,743	412,826
Totals	8,434,986	8,648,812	4,069,336	5,929,248	5,713,278	3,381,597

III. METHODOLOGY

The market conduct examination places emphasis on an insurer's systems, procedures and guidelines used in dealing with insureds and claimants. The examination period under review was May 1, 2020, through April 30, 2021, except for complaints which had an examination period beginning December 1, 2019

The following categories were the areas examined:

- A. Complaint Handling
- B. Marketing and Sales
- C. Risk Selection
- D. Underwriting and Rating
- E. Claims

The review of these categories was accomplished through examination of individual policy and claim files, the Companies' procedures, written interrogatories and interviews with the Companies' personnel. Each category was examined for compliance with Illinois Department of Insurance ("DOI") rules and regulations, and applicable state laws.

Criticisms were provided to the Companies addressing violations discovered in the review processes. All valid criticisms were incorporated into this report.

The following methods were used to obtain the required samples and to assure a statistically accurate and methodical selection. The samples were developed from data provided by the Companies. The sample size was based on the most recent NAIC Market Regulation Handbook. Random samples were generated using Audit Command Language ("ACL") software and the selected samples were provided to the Companies for retrieval.

Since the examination was conducted at the group level, the data from both Companies was combined prior to the random sampling. As such, the findings do not identify the specific company.

Complaint Handling

DOI Complaints and Consumer Complaints for the period December 1, 2019 through April 30, 2021, were reviewed for compliance with applicable state laws and the Companies' own guidelines.

DOI Complaints – The population request for this category consisted of complaints received by the DOI during the examination period. The Companies' complaint registry was reconciled with the individual file information and the DOI records to determine the completeness and accuracy of the data recorded. Each complaint file, along with the underlying claim or underwriting file, was reviewed for compliance with regulatory requirements.

Consumer Complaints – The population request for this category consisted of complaints received directly by the Companies from consumers during the examination period. The Companies' complaint registry was reconciled with the individual file information to determine the completeness and accuracy of the data recorded. Each complaint file, along with the underlying claim or underwriting file, was reviewed for compliance with regulatory requirements.

Marketing and Sales

Marketing and sales materials were reviewed to evaluate the representations made by the Companies about its products or services and for compliance with applicable state laws and the Companies' own guidelines.

The examiners requested the Companies' advertising and marketing manual; procedures for the approval of any advertising developed by brokers or agents; a listing of all advertising and marketing materials used by the Companies during the examination period; and producer training manuals.

The reviews included judgmental sampling from the listing of all advertising and marketing materials provided by the Companies.

Risk Selection

Cancellations, Nonrenewals and Rescissions were reviewed for compliance with applicable state laws, the Companies' guidelines, and to ensure reasons for termination were valid and not unfairly discriminatory.

Random samples were selected based on transactions occurring during the examination period.

Underwriting and Rating

The underwriting samples consisted of new and renewal business.

The new business sample was randomly selected based on the inception date occurring during the examination period. Policies were reviewed for rating accuracy, use of filed rates, use of filed forms, and for compliance with applicable state laws and the Companies' guidelines.

The renewal business sample was randomly selected based on the renewal date occurring during the examination period. Policies were reviewed for use of filed rates, use of filed forms, and for compliance with applicable state laws and the Companies' guidelines.

Claims

Claims were selected based on settlement occurring within the examination period. Claims were reviewed for compliance with policy contracts and endorsements, applicable sections of the Illinois Insurance Code (215 ILCS 5/1, et seq.) and the Illinois Administrative Code (50 Ill. Adm. Code 101 et seq.).

Separate samples were selected for First-party and Third-party claims. For each, separate samples were developed for both paid claims and those closed without payment ("CWP"). In addition, separate reviews were conducted on all total loss, subrogated and litigated claims.

IV. SELECTION OF SAMPLES

A. Complaint Handling		Sample Size	Percent Reviewed
1.	DOI Complaints	1	100.00%
2.	Consumer Complaints	4	100.00%
B. Marketing and Sales		Sample Size	Percent Reviewed
1.	Company-generated Marketing	84	34.40%
2.	Producer Training Materials	84	25.40%
C. Risk Selection		Sample Size	Percent Reviewed
1.	PPA Cancellations - Less than 60 days	16	100.00%
2.	PPA Cancellations - Greater than 60 days	86	18.70%
3.	PPA Nonrenewals	72	100.00%
4.	PPA Declinations	4	100.00%
5.	HO Cancellations - Less than 60 days	16	100.00%
6.	HO Cancellations - Greater than 60 days	86	18.30%
7.	HO Nonrenewals	72	100.00%
8.	HO Declinations	4	100.00%
9.	DF Cancellations - Less than 60 days	2	100.00%
10.	DF Cancellations - Greater than 60 days	21	100.00%
11.	DF Nonrenewals	13	100.00%
12.	FO Cancellations - Less than 60 days	21	100.00%
13.	FO Cancellations - Greater than 60 days	31	100.00%
14.	FO Nonrenewals	1	100.00%
15.	FO Declinations	3	100.00%
16.	CMP Cancellations - Less than 60 days	21	100.00%
17.	CMP Cancellations - Greater than 60 days	84	23.90%
18.	CMP Nonrenewals	65	100.00%
19.	CMP Declinations	115	5.40%
20.	CA Cancellations - Less than 60 days	3	100.00%
21.	CA Cancellations - Greater than 60 days	79	59.40%
22.	CA Nonrenewals	51	100.00%
23.	CA Declinations	114	8.20%
24.	WC Cancellations - Less than 60 days	3	100.00%
25.	WC Cancellations - Greater than 60 days	74	100.00%
26.	WC Nonrenewals	44	100.00%
27.	WC Declinations	114	9.00%

D. Underwriting and Rating	Sample Size	Percent Reviewed
1. PPA New Business	84	29.70%
2. PPA Renewals	115	3.90%
3. HO New Business	84	33.60%
4. HO Renewals	115	4.00%
5. DF New Business	16	100.00%
6. DF Renewals	79	54.10%
7. FO New Business	79	65.80%
8. FO Renewals	84	22.80%
9. CMP New Business	113	17.10%
10. CMP Renewals	115	4.50%
11. CA New Business	84	25.10%
12. CA Renewals	114	9.10%
13. WC New Business	84	4.00%
14. WC Renewals	113	12.70%
E. Claims	Sample Size	Percent Reviewed
1. Private Passenger Automobile - First-Party Paid	105	18.80%
2. Private Passenger Automobile - First-Party CWP	58	100.00%
3. Private Passenger Automobile - Total Loss	43	100.00%
4. Private Passenger Automobile - Third-Party Paid	85	100.00%
5. Private Passenger Automobile - Third-Party CWP	42	100.00%
6. Private Passenger Automobile - Subrogation	51	100.00%
7. Private Passenger Automobile - Litigated	6	100.00%
8. Homeowners - Paid	82	32.40%
9. Homeowners - CWP	87	100.00%
10. Dwelling Fire - Paid	10	100.00%
11. Dwelling Fire - CWP	12	100.00%
12. Farmowners - Paid	98	100.00%
13. Farmowners - CWP	32	100.00%
14. Commercial Multiple Peril - Paid	82	36.80%
15. Commercial Multiple Peril - CWP	76	39.60%
16. Commercial Automobile - Paid	105	18.40%
17. Commercial Automobile - CWP	76	61.30%
18. Workers' Compensation - Paid	82	27.10%
19. Workers' Compensation - CWP	49	100.00%

V. FINDINGS

A. Complaint Handling

1. DOI Complaints
 - a. No violations were noted.
2. Consumer Complaints
 - a. No violations were noted.

B. Marketing and Sales

1. Company-generated Marketing
 - a. No violations were noted.
2. Producer Training Materials
 - a. No violations were noted.

C. Risk Selection

1. PPA Cancellations – Less than 60 days
 - a. No violations were noted.
2. PPA Cancellations – Greater than 60 days
 - a. No violations were noted.
 - b. In four (4) files (4.7% of the 86 examined), the Companies failed to return the correct amount of unearned premiums to the insured, resulting in refund shortfall; thereby violating the Companies' policy and 215 ILCS 5/143.12a. In addition, the Companies identified 121 additional policies with overcharges totaling \$8,418. The Companies provided evidence of the refunds during the examination. (Crit #147)
 - c. In one (1) file (1.2% of the 86 examined), the Companies failed to return the correct amount to the insured, thereby violating its policy provisions and 215 ILCS 5/143.12a. The result was an underpayment of \$33. In addition, the Companies identified eighteen (18) additional policies with overcharges totaling \$1,822. The Companies provided evidence of the refunds during the examination. (Crit #063)
3. PPA Nonrenewals
 - a. No violations were noted.
4. PPA Declinations
 - a. No violations were noted.
5. HO Cancellations – Less than 60 days
 - a. No violations were noted.
6. HO Cancellations – Greater than 60 days
 - a. No violations were noted.
7. HO Nonrenewals
 - a. In one (1) file (1.4% of the 72 examined), the Companies failed to give reasonable period of time to repair defects to the first named insured, thereby violating 215 ILCS 5/143.27. (Crit #028)
8. HO Declinations
 - a. No violations were noted.
9. DF Cancellations – Less than 60 days
 - a. No violations were noted.
10. DF Nonrenewals
 - a. No violations were noted.
11. FO Cancellations – Less than 60 days
 - a. No violations were noted.

12. FO Cancellations – Greater than 60 days
 - a. No violations were noted.
13. FO Nonrenewals
 - a. In one (1) file (100.0% of the of 1 examined), the Companies failed to include a specific explanation in the notice of intention not to renew coverage to the first named insured, thereby violating 215 ILCS 5/143.17e. (Crit #019)
 - b. In one (1) file (100.0% of the 1 examined), the Companies failed to include the Right of Appeal in the notice of intention not to renew coverage to the first named insured, thereby violating 215 ILCS 5/143.23. (Crit #020)
14. FO Declinations
 - a. No violations were noted.
15. CMP Cancellations – Less than 60 days
 - a. No violations were noted.
16. CMP Cancellations – Greater than 60 days
 - a. No violations were noted.
17. CMP Nonrenewals
 - a. In twenty (20) files (30.8% of the 65 examined), the Companies failed to include the Right of Appeal in the Cancellation Notice to the first named insured, thereby violating 215 ILCS 5/143.23. (Crit #050)
 - b. In twenty (20) files (30.8% of the 65 examined), the Companies failed to provide the first named insured with loss information at the same time as the notice of nonrenewal, thereby violating 215 ILCS 5/143.10a(1). (Crit #051)
 - c. In one (1) file (1.5% of the 65 examined), the Companies failed to include the FAIR Plan Eligibility in the Notice of Cancellation to the first named insured, thereby violating 215 ILCS 5/143.22. (Crit #052)
 - d. In fourteen (14) files (21.5% of the 65 examined), the Companies did not provide written notice to the named insured that included the specific explanation of the reason(s) for nonrenewal, thereby violating 215 ILCS 5/143.17a(a). (Crit #053)
18. CMP Declinations
 - a. No violations were noted.
19. CA Cancellations – Less than 60 days
 - a. No violations were noted.
20. CA Cancellations – Greater than 60 days
 - a. In one (1) file (1.3% of the 79 examined), the Companies failed to provide to the insured and loss payee(s) 10 days' written notice of cancellation for nonpayment of premiums as required by the Companies' own policy endorsement (CA02100118), thereby violating 215 ILCS 5/143.11. (Crit #008)
 - b. In one (1) file (1.3% of the 79 examined), the Companies failed to provide to the loss payee 10 days' written notice of cancellation for nonpayment of premiums as required by the Companies' own policy endorsement (CA 02 70 01 18), thereby violating 215 ILCS 5/143.11. (Crit #017)

21. CA Nonrenewals
 - a. In eleven (11) files (21.6% of the 51 examined), the Companies failed to provide the first named insured with loss information at the same time as the notice of nonrenewal, thereby violating 215 ILCS 5/143.10a (1). (Crit #011)
 - b. In ten (10) files (19.6% of the 51 examined), the Companies did not provide written notice to the named insured that included the specific explanation of the reason(s) for nonrenewal, thereby violating 215 ILCS 5/143.17a. (Crit #040)
 - c. In ten (10) files (19.6% of the 51 examined), the Companies failed to include the Right of Appeal in the nonrenewal notice to the first named insured, thereby violating 215 ILCS 5/143.23. (Crit #041)
22. CA Declinations
 - a. No violations were noted.
23. WC Cancellations – Less than 60 days
 - a. No violations were noted.
24. WC Cancellations – Greater than 60 days
 - a. No violations were noted.
25. WC Nonrenewals
 - a. In four (4) files (9.1% of the 44 examined), the Companies did not provide written notice to the named insured that included the specific explanation of the reason(s) for nonrenewal, thereby violating 215 ILCS 5/143.17a. (Crit #022)
 - b. In fifteen (15) files (34.1% of the 44 examined), the Companies did not advise the insured of the right to request a hearing, thereby violating 215 ILCS 5/143.23. (Crit #023)
26. WC Declinations
 - a. No violations were noted.

D. Underwriting and Rating

1. PPA New Business
 - a. In general, Secura Supreme Insurance Company and Secura Insurance, A Mutual Company (now known as Secura Insurance Company) filed revised financial stability rules and related factors on or about May 31, 2012. The financial stability scores used to develop premiums were to be derived from LexisNexis Risk Solutions Inc.'s "Attract™" scoring model. The Companies failed to file the "Attract™" scoring model in violation of 215 ILCS 157/40 and 50 Ill. Adm. Code 754.10(a) and (b). (Crit #005)
 - b. In general, Secura Insurance, A Mutual Company (now known as Secura Insurance Company) filed its initial private passenger automobile filing including financial stability rules and related factors on or about July 22, 2008. The financial stability scores used to develop premiums were to be derived from ChoicePoint's "CP Attract HO-3" insurance scoring model. Secura Insurance Company failed to file the "CP Attract HO-3" insurance scoring model in violation of 215 ILCS 157/40 and 50 Ill. Adm. Code 754.10(a) and (b). (Crit #006)

- c. In general, Secura Supreme Insurance Company supplemented its initial personal lines package filing by providing additional information related to the use of insurance scores and related factors on February 12, 2004. The financial stability scores were to be derived from ChoicePoint's "CP Attract HO-3" insurance scoring model. Secura Supreme Insurance Company failed to file the "CP Attract HO-3" insurance scoring model in violation of 215 ILCS 157/40 and 50 Ill. Adm. Code 754.10(a) and (b). (Crit #007)
- d. As a result of this examination, it was discovered that prior to the examination period, the Companies implemented ISO's Personal Auto – Risk Analyzer Personal Auto Environmental Module without proper notice to the DOI of the adoption of ISO's filing in violation of 50 Ill. Adm. Code 754.10. (Crit #149)
- e. Furthermore, as a result of this examination, it was discovered that prior to the examination period, the Companies implemented ISO's Personal Auto Model Year and Symbol Program; however, the Companies did not file the ISO program. The Companies failed to properly notify the DOI of the implementation of the program and provide the offsets required to demonstrate revenue neutrality as instructed by ISO and required by the DOI in violation of 50 Ill. Adm. Code 754.10. (Crit #150)
- f. In six (6) files (7.1% of the 84 examined), the disparity in the territory relativities violate 215 ILCS 5/155.17. The Companies have 5 territories that include locations within Chicago. The territories are identified as Territory 34, 35 38, 91, and 93. In Territory 38, the Company has bodily injury liability rates deviating from the remaining Chicago territories. In 6 of the 84 files reviewed, there were exposures located in a Chicago territory. The Companies determined a total of 279 policies were impacted by this error and calculated overcharges totaling \$4,761. The Companies provided evidence of the refunds during the examination. (Crit #021)
- g. In one (1) file (1.2% of the 84 examined), the Companies' failure to apply or verify eligibility for Early Quote Discount results in unfairly discriminatory rates and is determined to be an unfair method of competition and an unfair practice pursuant to 215 ILCS 5/423(1). The Companies' rating system captures the date of quote, but the Early Quote Discount is not applied unless the agent selects the appropriate box. This resulted in overcharges totaling \$67.00. The Companies provided evidence of the refund during the examination. (Crit #026)
- h. In eighty-four (84) files (100.0% of the 84 examined), the Companies failed to display the words "ILLINOIS INSURANCE CARD" on the top of the front of the insurance card as required by 50 Ill. Adm. Code 8010.20(b). (Crit #027)
- i. In one (1) file (1.2% of the 84 examined), the Companies failed to retain verifiable records necessary to validate the rating of insurance policies, violating 215 ILCS 5/132 and 215 ILCS 5/133. (Crit #139)

2. PPA Renewals
 - a. In twelve (12) files (10.4% of the 115 examined), the Companies failed to notify the individual planning to purchase the first renewal of a policy of automobile insurance of the availability of higher deductibles for collision and comprehensive coverage and that a premium savings could result if the higher deductibles were purchased in violation of 215 ILCS 5/143.25a. (Crit #001)
 - b. In one hundred and fifteen (115) files (100.0% of the 115 examined), the Companies failed to display the words “ILLINOIS INSURANCE CARD” on the top of the front of the insurance card as required by 50 Ill. Adm. Code 8010.20(b). The Companies stated that “effective January 5, 2022, SECURA’s auto ID cards have the following language “Illinois Insurance Identification Card.” (Crit #002)
3. HO New Business
 - a. In two (2) files (2.4% of the 84 examined), the Companies failed to provide Mine Subsidence Waivers for those properties where the coverage or a signed waiver is required in violation of 215 ILCS 5/805.1(a). (Crit #032)
 - b. Prior to the examination period, the Companies implemented ISO’s Home – Risk Analyzer Environmental Module without proper notice to the DOI of the adoption of ISO’s filing in violation of 50 Ill. Adm. Code 754.10. (Crit #148)
4. HO Renewals
 - a. In two (2) files (1.7% of the 115 examined), the Companies failed to provide Mine Subsidence Waivers for those properties where the coverage or a signed waiver is required in violation of 215 ILCS 5/805.1(a). (Crit #009)
5. DF New Business
 - a. In two (2) files (12.5% of the 16 examined), the Companies failed to provide Mine Subsidence Waivers for those properties where the coverage or a signed waiver is required in violation of 215 ILCS 5/805.1(a). (Crit #016)
 - b. In one (1) file (6.3% of the 16 examined), the Companies failed to remove a woodstove surcharge after the insured notified the Companies that the woodstove was removed, thereby violating 50 Ill. Adm. Code 754.10. This resulted in an overcharge of \$60. The Companies provided evidence of the refund during the examination. (Crit #033)
6. DF Renewals
 - a. In four (4) files (5.1% of the 79 examined), the Companies failed to provide Mine Subsidence Waivers for those properties where the coverage or a signed waiver is required in violation of 215 ILCS 5/805.1(a). (Crit #010)
7. FO New Business
 - a. In one (1) file (1.3% of the 79 examined), the Companies misclassified a Farm Building based on building type and insurance to value as defined in the rules. The Companies’ inconsistent application of its rating rules resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in an undercharge totaling \$100.00. (Crit #098)

- b. In thirty-five (35) files (44.3% of the 79 examined), the Companies utilized a formula differing from the method specified on the “Illinois Liability Rates” Page for policies effective on or after 1/1/2021. The Companies’ inconsistent application of the method specified in the “Illinois Liability Rates” Page resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in overcharges totaling \$262. The Companies provided evidence of the \$262 refund to the file discovered in error. In addition, the Companies conducted an audit and discovered 504 active policies and 31 cancelled or lapsed policies that contained the same error. The Companies provided evidence of refunds in the total amount of \$5,625 to the active and cancelled or lapsed policies. (Crit #099)
 - c. In eight (8) files (10.1% of the 79 examined), the Companies used a rating procedure inconsistent with their published rates and rules. The Companies’ inconsistent application of its published rates and rules resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in overcharges totaling \$157.00. The Companies did not provide evidence of the refund during the examination. (Crit #100)
- 8. FO Renewals
 - a. In one (1) file (1.2% of the 84 examined), the Mine Subsidence Waiver located in the file is signed and dated by the applicant subsequent to the effective date of the renewal. The Companies failed to provide a Mine Subsidence Waiver executed prior to the renewal date in violation of 215 ILCS 5/805.1(a). (Crit #013)
- 9. CMP New Business
 - a. In general, the Companies filing to remove ISO’s Rule 70 resulted in the inability to properly rate any Business Personal Property (“BPP”) policies according to the Companies’ filed BPP rating rules. The Companies’ inability to properly rate BPP policies according to its filed rating rules resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). (Crit #143)
 - b. In one (1) file (0.9% of the 113 examined), the Companies nonrenewed property having exposure to mine subsidence without evidencing unrepaired damage existed or if any such damage had been repaired in violation of 215 ILCS 5/808.1. (Crit #141)
 - c. In five (5) files (4.4% of the 113 examined), the Companies failed to follow their own manual rating procedures by targeting competitors premiums resulting in unfairly discriminatory pricing and violating 215 ILCS 5/423(1). (Crit #142)
 - d. In one (1) file (0.9% of the 113 examined), the Companies failed to include a specific explanation in the notice of intention not to renew coverage to the named insured in violation of 215 ILCS 5/143.17e. (Crit #144)
 - e. In one (1) file (0.9% of 113 files examined), the Companies failed to apply the Commercial Property and Commercial General Liability Property rates in effect on the policy effective date. The Companies’ inconsistent application of its own rates resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). (Crit #146)

10. CMP Renewals

- a. In five (5) files (4.3% of the 115 examined), the Companies failed to provide Mine Subsidence Waivers for those properties where the coverage or a signed waiver is required in violation of 215 ILCS 5/805.1(a). (Crit #012)

11. CA New Business

- a. In three (3) files (3.6% of the 84 examined), the Companies failed to assign vehicles to the proper rating territory based on the garage location. The Companies' inconsistent application of their agent manual requirements resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in undercharges totaling \$19,398.00. (Crit #074)
- b. In twenty (20) files (23.8% of the 84 examined), the Companies failed to provide evidence insureds were advised of the right to reject uninsured/underinsured motorist coverage in excess of the minimum limits as required by law, thereby violating 215 ILCS 5/143a-2. (Crit #076)
- c. In one (1) file (1.2% of the 84 examined), the Companies failed to provide evidence the insured rejected uninsured/underinsured motorist coverage in an amount equal to the insured's bodily injury liability limits. The Companies failed to issue the policy with uninsured/underinsured motorist with limits equal to the insured's bodily injury liability limits, thereby violating 215 ILCS 5/143a-2. (Crit #080)
- d. In two (2) files (2.4% of the 84 examined), the Companies failed to utilize the proper primary classification for the size class or radius of vehicle operation. The Companies' inconsistent application of its policies resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in undercharges totaling \$106.00. (Crit #081)
- e. In two (2) files (2.4% of the 84 examined), the Companies failed to apply the Loss Cost Multiplier to the garagekeeper's as required by the Companies' exception to ISO Commercial Auto Rule 55. The Companies' inconsistent application of its exception to ISO Commercial Auto Rule 55 resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in undercharges totaling \$916.00. (Crit #091)
- f. In one (1) file (1.2% of the 84 examined), the Companies applied a renewal reward to a new policy. The Companies' inconsistent application of its policies and procedures resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in an undercharge totaling \$77.00. (Crit #096)
- g. In one (1) file (1.2% of the 84 examined), the Companies failed to apply the appropriate non-franchised factor. The Companies' inconsistent application of its policies and procedures resulted in an unfair method of competition in violation of 215 ILCS 5/423(1). This resulted in an undercharge totaling \$672.00. (Crit #097)

12. CA Renewals

- a. No violations were noted.

13. WC New Business

- a. In one (1) file (1.2% of the 84 examined), the Companies used forms which were previously withdrawn for use by the NCCI in the state of Illinois and the forms were not subsequently filed independently by the Companies, violating 215 ILCS 5/143(2) and 50 Ill. Adm. Code 753.10(a)(1). (Crit #057)
- b. In twenty-two (22) files (26.2% of the 84 examined), the Companies did not retain evidence in the file to support the applied scheduled debits or credits. The failure to adhere to their own WCE - SRP-1 Rule, violated 215 ILCS 5/457(1) and 215 ILCS 5/462b. (Crit #059)
- c. In three (3) files (3.6% of the 84 examined), the Companies did not attach form #PLI 4001 2101 (Disclosure Pursuant to Terrorism Risk Insurance Act Terrorism Coverage Notice) to the policies, violating 215 ILCS 5/143(2). (Crit #060)

14. WC Renewals

- a. In one (1) file (0.9% of the 113 examined), the Companies failed to provide 60 days' notice when there was an increase in premium of 30% or more upon renewal of the policy, violating 215 ILCS 5/143.17a. This resulted in an overcharge of \$1,025. The Companies provided evidence of the refund during the examination. (Crit #083)
- b. In eight (8) files (7.1% of the 113 examined), the file documentation contained in the files for the schedule rating factors that were applied to the workers' compensation renewal policy were not based on the Companies' filed schedule rating plan risk characteristics, violating 215 ILCS 5/457(1) and 215 ILCS 5/462b. (Crit #084)
- c. In twenty (20) files (17.7% of the 113 examined), the Companies did not retain evidence to support the applied scheduled debits or credits, violating 215 ILCS 5/457(1). (Crit #085)
- d. In eleven (11) files (9.7% of the 113 examined), the Companies' documented schedule rating documentation for changes from the prior year, however, they do not match the factors on the corresponding declarations pages for the prior policy term, thereby violating 215 ILCS 5/457(1) and 215 ILCS 5/462b. (Crit #086)
- e. In forty-nine (49) files (43.4% of the 113 examined), the Companies failed to maintain documentation sufficient to support the factor changes at renewal from the prior policy term, thereby violating 215 ILCS 5/457(1). (Crit #087)
- f. In eight (8) files (7.1% of the 113 examined), the Companies' documentation for the schedule rating factors applied to the workers' compensation renewal policy did not match the declarations, thereby violating 215 ILCS 5/457(1) and 215 ILCS 5/462b. (Crit #088)
- g. In four (4) files (3.5% of the 113 examined), where scheduled rating factors were changed from the prior year, the credits/debits applied were not based on the Companies' filed scheduled rating plan risk characteristics for the prior policy term, thereby violating 215 ILCS 5/457(1) and 215 ILCS 5/462b. (Crit #089)
- h. In eight (8) files (7.1% of the 113 examined), the Companies failed to attach form #PLI 4001 2101 (Disclosure Pursuant to Terrorism Risk Insurance Act Terrorism Coverage Notice) to the policies, which replaced form #PLI 4001 01-15 effective 1/1/2021, violating 215 ILCS 5/143(2) and 50 Ill. Adm. Code 753.10(a)(3). (Crit #090)

E. Claims

1. PPA First-Party Paid
 - a. In two (2) files (1.9% of the 105 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #077)
 - b. In five (5) files (4.8% of the 105 examined), the Companies failed to offer payment within 30 days after affirmation of liability in violation of 50 Ill. Adm. Code 919.50(a). (Crit #078)
 - c. In four (4) files (3.8% of the 105 examined), the Companies failed to send a delay letter to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #079)
2. PPA First-Party Closed Without Payment
 - a. In seven (7) files (12.1% of the 58 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #093)
 - b. In two (2) files (3.4% of the 58 examined), the Companies' denial letters failed to include the Notice of Availability of the Department of Insurance in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #094)
 - c. In one (1) file (1.7% of the 58 examined), the Companies' denial letter failed to include the applicable policy language upon which the denial was based in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #095)
3. PPA Total Loss
 - a. In two (2) files (4.7% of the 43 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #116)
 - b. In one (1) file (2.3% of the 43 examined), the Companies failed to send a delay letter to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #117)
 - c. In three (3) files (7.0% of the 43 examined), the Companies failed to send an Exhibit A Letter in violation of 50 IL Adm. Code 919.80(c). (Crit #118)
 - d. In one (1) file (2.3% of the 43 examined), the amount to be paid as noted on the Total Loss Settlement Letter did not match the amount paid for settlement of the total loss claim. The Companies issued a claim payment in an incorrect amount in violation of 215 ILCS 5/154.6(d). This resulted in a \$494.99 underpayment. The Companies provided evidence of the additional payment during the examination. (Crit #125)
4. PPA Third-Party Paid
 - a. No Violations were noted.
5. PPA Third-Party Closed Without Payment
 - a. In two (2) files (4.8% of the 42 examined), the Companies failed to send a delay letter to the third-party claimants having open claims for over 60 days in violation of 50 Ill. Adm. Code 919.80(b)(3). (Crit #137)
6. PPA Subrogation
 - a. No violations were noted.
7. HO Paid
 - a. In one (1) file (1.2% of the 82 examined), the Companies paid a claim of an insured property owner for the loss by fire or explosion to a structure located in Illinois where the amount recoverable for loss to the structure exceeded \$25,000 without receiving the required certificate in violation of 215 ILCS 5/397.1(a). (Crit #105)

- b. In two (2) files (2.4% of the 82 examined), the Companies failed to send a delay letter to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #106)
 - c. In two (2) files (2.4% of the 82 examined), the Companies failed to send an Excess of Loss Letter providing a reasonable written explanation as why the settlement amount of the claim was less than the amount claimed to the insured, which was a violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #107)
- 8. HO Closed Without Payment
 - a. In seventeen (17) files (19.5% of the 87 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured for claims that were unresolved for more than 75 calendar days in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #113)
 - b. In two (2) files (2.3% of the 87 examined), the Companies' denial letters failed to include the Notice of Availability of the Department of Insurance in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #114)
- 9. DF Paid
 - a. In one (1) file (10.0% of the 10 examined), the Companies issued a claim payment in an incorrect amount in violation of 215 ILCS 5/154.6(d). This resulted in an in a \$96.95 overpayment. (Crit #111)
- 10. DF Closed Without Payment
 - a. In one (1) file (8.3% of the 12 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #104)
- 11. FO Paid
 - a. In twenty-four (24) files (24.5% of the 98 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #067)
 - b. In one (1) file (1.0% of the 98 examined), the Companies failed to provide to the insured a reasonable written explanation of the denial within 30 days after the investigation and determination of liability is completed in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #068)
 - c. In three (3) files (3.1% of the 98 examined), the Companies failed to offer payment within 30 days after affirmation of liability in violation of 50 Ill. Adm. Code 919.50(a). (Crit #069)
 - d. In one (1) file (1.0% of the 98 examined), the Companies paid a claim of an insured property owner for the loss by fire or explosion to a structure located in Illinois where the amount recoverable for loss to the structure exceeded \$25,000 without receiving the required certificate in violation of 215 ILCS 5/397.1(a). (Crit #070)
 - e. In seven (3) files (3.1% of the 98 examined), the Companies failed to send a delay letter to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #071)
- 12. FO Closed Without Payment
 - a. In seven (7) files (21.9% of the 32 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #064)

- b. In one (1) file (3.1% of the 32 examined), the Companies' denial letter failed to include the Notice of Availability of the Department of Insurance in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #065)
- 13. CMP Paid
 - a. In three (3) files (3.7% of the 82 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #108)
 - b. In eleven (1) files (1.22% of the 82 examined), the Companies failed to send a delay letter to the insured in violation of 50 Ill. Adm. Code 919.80(d)(7)(B). (Crit #109)
 - c. In one (1) file (1.2% of the 82 examined), the Companies paid a claim of an insured property owner for the loss by fire or explosion to a structure located in Illinois where the amount recoverable for loss to the structure exceeded \$25,000 without receiving the required certificate in violation of 215 ILCS 5/397.1(a). (Crit #110)
- 14. CMP Closed Without Payment
 - a. In four (1) files (1.31% of the 76 examined), the Companies' denial letters failed to include the Notice of Availability of the Department of Insurance in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #126)
- 15. CA Paid
 - a. In three (3) files (2.9% of the 105 examined), the Companies' delay letters failed to provide a reasonable written explanation for the delay to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #131)
 - b. In one (1) file (1.0% of the 105 examined), the Companies failed to offer payment within 30 days after affirmation of liability in violation of 50 Ill. Adm. Code 919.50(a). (Crit #133)
 - c. In one (1) file (1.0% of the 105 examined), the Companies failed to send a delay letter to the insured in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #134)
 - d. In three (3) files (2.9% of the 105 examined), the Companies failed to send an Exhibit A Letter on total losses in violation of 50 IL Adm. Code 919.80(c). (Crit #135 had 2 files in error and Crit #145 had 1 file in error.)
 - e. In one (1) file (1.0% of the 105 examined), the Companies failed to respond to an Arbitration Forums filing (a pertinent communication), in violation of 215 ILCS 5/154.6(b). (Crit #136)
- 16. CA Closed Without Payment
 - a. In one (1) file (1.3% of the 76 examined), the Companies' denial letters failed to include the Notice of Availability of the Department of Insurance in violation of 50 Ill. Adm. Code 919.50(a)(1). (Crit #127)
 - b. In one (1) file (1.3% of the 76 examined), the Companies failed to send a delay letter to the third-party claimant in violation of 50 Ill. Adm. Code 919.80(b)(3). (Crit #128)
 - c. In one (1) file (1.3% of the 76 examined), the Companies failed to include the Notice of Availability of the Department of Insurance in the delay letter to the first-party claimant in violation of 50 Ill. Adm. Code 919.80(b)(2). (Crit #129)
 - d. In one (1) file (1.3% of the 76 examined), the Companies failed to include the Notice of Availability of the Department of Insurance in the delay letter to the third-party claimant in violation of 50 Ill. Adm. Code 919.80(b)(3). (Crit #130)

17. WC Paid

- a. In eighty-two (82) files (100.0% of the 82 examined), the Companies failed to provide reports by the 15th of each month that lists compensable claims incurred during the preceding month, as well as a cumulative report of all claims incurred during a calendar year, thereby violating 820 ILCS 305/19(o). (Crit #102)
- b. In eleven (11) files (13.4% of the 82 examined), the Companies failed to issue payments to provider(s) within 30 days of receiving a valid bill and interest was not paid for the delayed payment, thereby violating 820 ILCS 305/8.2(d)(3). This resulted in interest underpayments totaling \$237.86. The Companies provided evidence of the interest payments during the examination. (Crit #112)

18. WC Closed Without Payment

- a. In twenty-four (24) files (49.0% of the 49 examined), the Companies failed to provide reports by the 15th of each month that lists compensable claims incurred during the preceding month, as well as a cumulative report of all claims incurred during a calendar year, thereby violating 820 ILCS 305/19(o). (Crit #121)



IN THE MATTER OF:

**SECURA INSURANCE COMPANY
1500 MUTUAL WAY
NEENAH, WI 54956**

STIPULATION AND CONSENT ORDER

WHEREAS, the Director of the Illinois Department of Insurance ("Department") is a duly authorized and appointed official of the State of Illinois, having authority and responsibility for the enforcement of the insurance laws of this State; and

WHEREAS, Secura Insurance Company, NAIC 22543, and Secura Supreme Insurance Company, NAIC 10239, is authorized under the insurance laws of this State and by the Director to engage in the business of soliciting, selling and issuing insurance policies; and

WHEREAS, a Market Conduct Examination of the Company was conducted by a duly qualified examiner of the Department pursuant to Sections 132, 401, 402, 403, and 425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402, 5/403, and 5/425); and

WHEREAS, as a result of the Market Conduct Examination, the Department examiner filed a Market Conduct Examination Report covering the examination period of December 1, 2019, through April 30, 2021, which is an official document of the Department; and

WHEREAS, the Market Conduct Examination Report cited various areas in which the Company was not in compliance with the Illinois Insurance Code (215 ILCS 5/1 *et seq.*) and Department Regulations (50 Ill. Adm. Code 101 *et seq.*); and

WHEREAS, nothing herein contained, nor any action taken by the Company in connection with this Stipulation and Consent Order, shall constitute, or be construed as, an admission of fault, liability or wrongdoing of any kind whatsoever by the Company; and

WHEREAS, the Company is aware of and understands their various rights in connection with the examination and report, including the right to counsel, notice, hearing and appeal under Sections 132, 401, 402, 407, and 407.2 of the Illinois Insurance Code and 50 Ill. Adm. Code 2402; and

WHEREAS, the Company understands and agrees that by entering into this Stipulation and Consent Order, they waive any and all rights to notice and hearing; and

WHEREAS, the Company and the Director, for the purpose of resolving all matters raised by the report and in order to avoid any further administrative action, hereby enter into this Stipulation and Consent Order.

NOW, THEREFORE, IT IS AGREED by and between the Company and the Director as follows:

1. The Market Conduct Examination indicated various areas in which the Company was not in compliance with provisions of the Illinois Insurance Code and Department Regulations; and
2. The Director and the Company consent to this Order requiring the Company to take certain actions to come into compliance with provisions of the Illinois Insurance Code and Department Regulations.

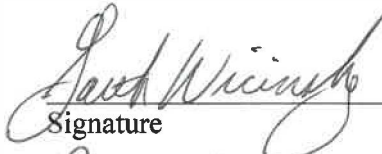
THEREFORE, IT IS HEREBY ORDERED by the undersigned Director that the Company shall:


1. Institute and maintain policies and procedures whereby the Company shall provide notice of availability of higher deductibles. 215 ILCS 5/143.25a
2. Institute and maintain policies and procedures whereby the Company shall display "ILLINOIS INSURANCE CARD" on the top of the front of the insurance card. 50 Ill. Adm. Code 8010.20(b)
3. Institute and maintain policies and procedures whereby the Company shall file all rating models and algorithms as required under 215 ILCS 157/40.
4. Institute and maintain policies and procedures whereby the Company shall provide loss information with the nonrenewal notice. 215 ILCS 5/143.10a(1)
5. Institute and maintain policies and procedures whereby the Company shall provide signed Mine Subsidence Waivers. 215 ILCS 5/805.1(a)
6. Institute and maintain policies and procedures whereby the Company shall provide a specific explanation of the reason for nonrenewal. 215 ILCS 5/143.17a and 215 ILCS 5/143.17e
7. Institute and maintain policies and procedures whereby the Company shall include the Right of Appeal. 215 ILCS 5/143.23
8. Institute and maintain policies and procedures whereby the Company shall retain evidence to support the applied scheduled debits or credits. 215 ILCS 5/457(1)
9. Institute and maintain policies and procedures whereby the Company shall provide a reasonable written explanation for the delay in the delay letter. 50 Ill. Adm. Code 919.80(d)(7)(B) and 50 Ill. Adm. Code 919.80(b)(2)
10. Institute and maintain policies and procedures whereby the Company shall provide evidence insureds were advised of the right to reject uninsured/underinsured motorist coverage in excess of the minimum limits. 215 ILCS 5/143a-2
11. Institute and maintain policies and procedures whereby the Company shall maintain documentation sufficient to support factor changes. 215 ILCS 5/457(1)

12. Institute and maintain policies and procedures whereby the Company shall not use a rating procedure inconsistent with published rates and rules. 215 ILCS 5/423(1)
13. Institute and maintain policies and procedures whereby the Company shall provide reports by the 15th of each month. 820 ILCS 305/19(o)
14. Institute and maintain policies and procedures whereby the Company shall not issue a claim payment in an incorrect amount. 215 ILCS 5/154.6(d)
15. Institute and maintain policies and procedures whereby the Company shall issue payments to providers within 30 days of receiving a valid bill and interest was not paid for the delayed payment. 820 ILCS 305/8.2(d)(3)
16. Institute and maintain policies and procedures whereby the Company shall not fail to send Exhibit A letter. 50 Ill. Adm. Code 919.80(c)
17. Institute and maintain policies and procedures whereby the Company shall not file to remove ISO's Rule 70 resulting in the inability to properly rate policies according to the Companies' filed BPP rating rules. 215 ILCS 5/423(1)
18. Institute and maintain policies and procedures whereby the Company shall file all rating related modules as required by 50 Ill. Adm. Code 754.10.
19. Institute and maintain policies and procedures whereby the Company shall file Personal Auto Model Year and Symbols in accordance with 50 Ill. Adm. Code 754.10.
20. Submit to the Director of Insurance, State of Illinois, proof of compliance with the above nineteen (19) orders within thirty (30) days of execution of this Order.
21. Pay to the Director of Insurance, State of Illinois, a civil forfeiture in the amount of \$119,000.⁰⁰ to be paid within ten (10) days of execution of this Order.

NOTHING contained herein shall prohibit the Director from taking any and all appropriate regulatory action as set forth in the Illinois Insurance Code including, but not limited to, levying additional forfeitures, should the Company violate any of the provisions of this Stipulation and Consent Order or any provisions of the Illinois Insurance Code or Department Regulations.

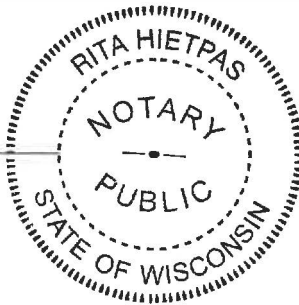
On behalf of SECURA INSURANCE COMPANY, and SECURA SUPREME INSURANCE COMPANY,


Signature
GARTH WICINSKY
Name
President & CEO
Title


Signature
Daniel P. Ferris
Name
VP, Chief Legal Officer & Corp Sec.
Title

Subscribed and sworn to before me this
28th day of November 2022.

Rita Hiempas
Notary Public



DEPARTMENT OF INSURANCE of the
State of Illinois:

DATE _____

Dana Popish-Severinghaus
Dana Popish-Severinghaus
Director

