



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

In Re:

ALLSTATE NORTH AMERICAN
INSURANCE COMPANY
(NAIC #11110)

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Market Conduct Investigation No. 452190

ORDER OF THE DIRECTOR

NOW, on this 27th day of March, 2026, Director Angela L. Nelson, after consideration and review of the Stipulation of Settlement (hereinafter "Stipulation") entered into by the Division of Insurance Market Regulation (hereinafter "Division") and Allstate North American Insurance Company (NAIC #11110) (hereinafter "Allstate"), relating to the market conduct investigation no. 452190, does hereby issue the following orders:

This order, issued pursuant to §374.046.15¹ and §374.280 RSMo, is in the public interest.

IT IS THEREFORE ORDERED that the Director does hereby approve the Stipulation as agreed to by Allstate and the Division.

IT IS FURTHER ORDERED that Allstate shall not engage in any of the violations of statutes and regulations set forth in the Stipulation, shall implement procedures to place it in full compliance with the requirements in the Stipulation and the statutes and regulations of the State of Missouri, shall maintain those corrective actions at all times, and shall fully comply with all terms of the Stipulation.

¹ All references, unless otherwise noted, are to Revised Statutes of Missouri 2016.

IT IS SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office
in Jefferson City, Missouri, this 27th day of March, 2026.



Angela L. Nelson
Angela L. Nelson
Director

**IN THE DEPARTMENT OF COMMERCE AND INSURANCE
STATE OF MISSOURI**

In Re:

**ALLSTATE NORTH AMERICAN
INSURANCE COMPANY (NAIC #11110)**

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Market Conduct Investigation No. 452190

STIPULATION OF SETTLEMENT

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the “Division”) and Allstate North American Insurance Company (hereinafter “Allstate”), as follows:

WHEREAS, the Division is a unit of the Missouri Department of Commerce and Insurance (hereinafter the “Department”), an agency of the State of Missouri, created and established for administering and enforcing all laws in relation to insurance companies doing business in the State of Missouri;

WHEREAS, Allstate has been granted a certificate of authority to transact the business of insurance in the State of Missouri;

WHEREAS, the Division conducted a market conduct investigation of Allstate, investigation no. 452190; and

WHEREAS, based on the market conduct investigation of Allstate, the Division alleges that:

1. Allstate issued a form that was not filed with the Department to 702 policyholders, in violation of §375.920¹ and 20 CSR 500-2.100 (1).

2. Allstate modified premium for comprehensive (“CP”) and uninsured motorist coverages (“UM”) based on accidents, in violation of §379.470 and 20 CSR 500-2.700 (1).

WHEREAS, the Division and Allstate have agreed to resolve the issues raised in the market

¹ All statutory references, unless otherwise noted, are to the 2016 Revised Statutes of Missouri.

conduct investigation as follows:

A. **Scope of Agreement.** This Stipulation of Settlement (hereinafter “Stipulation”) embodies the entire agreement and understanding of the signatories with respect to the subject matter contained herein. The signatories hereby declare and represent that no promise, inducement, or agreement not herein expressed has been made, and acknowledge that the terms and conditions of this agreement are contractual and not a mere recital.

B. **Remedial Action.** Allstate agrees to take remedial action bringing it into compliance with the statutes and regulations of Missouri and agrees to maintain those remedial actions at all times. Such remedial actions shall include the following:

1. Allstate agrees it will not issue a policy where premium for CP or UM coverages are modified based on any insured’s driving record of violations or accidents.

2. Allstate has filed with the Department rate factors for CP and UM coverages that are not modified by accidents and violations, and agrees to maintain this remedial action going forward.

3. Allstate agrees to review all automobile policies issued or renewed from December 18, 2023, to the date of the filing referenced in Section B 1 to determine if premium for UM or CP was modified as a result of an accident or driving record of violation. If premium was increased, Allstate agrees to issue a refund to the affected policyholder for the difference between the premium charged and the premium that would have been charged if the accidents or violations were not considered. Interest, in an amount determined pursuant to §374.191, will be included with the refund payments. An email or letter will also be included with the payment, indicating that, as a result of a Missouri Market Conduct Investigation, it was determined that a premium refund was due to the policyholder.

C. **Compliance.** Allstate agrees to file documentation pursuant to § 374.190 with the Division, in a format acceptable to the Division of any remedial action taken to implement compliance with the

terms of this Stipulation, including the payment of premium refunds to policyholders. Such documentation shall be provided within 12 months of the date of the entry of the Order approving this Stipulation unless otherwise specified in Section B above.

D. **Non-Admission.** Nothing in this Stipulation shall be construed as an admission by Allstate, this Stipulation being part of a compromise settlement to resolve disputed factual and legal allegations arising out of the above-referenced market conduct investigation.

E. **Waivers.** Allstate, after being advised by legal counsel, does hereby voluntarily and knowingly waive any and all rights to procedural requirements, including notice and an opportunity for a hearing, and review or appeal by any trial or appellate court, which may have otherwise applied to the market conduct investigation no. 452190.

F. **Amendments.** No amendments to this Stipulation shall be effective unless made in writing and agreed to by authorized representatives of the Division and Allstate.

G. **Governing Law.** This Stipulation shall be governed and construed in accordance with the laws of the State of Missouri.

H. **Authority.** The signatories below represent, acknowledge, and warrant that they are authorized to sign this Stipulation, on behalf of the Division and Allstate, respectively.

I. **Counterparts and Electronic Signature.** This Stipulation may be executed in multiple counterparts, each of which shall be deemed an original and all of which taken together shall constitute a single document. Execution by facsimile or by electronically transmitted signature shall be fully and legally effective and binding.

J. **Effect of Stipulation.** This Stipulation shall not become effective until entry of an Order by the Director approving this Stipulation.

K. **Request for an Order.** The signatories below request that the Director issue an Order

approving this Stipulation and ordering the relief agreed to in the Stipulation, and consent to the issuance of such Order.

DATED: March 19, 2026



Teresa Kroll
Chief Market Conduct Examiner
Division of Insurance Market Regulation

DATED: 3/16/2026



Name: Tyler Bixby
Title: State Manager
Allstate North American Insurance Company