



## DEPARTMENT OF COMMERCE & INSURANCE

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

*In Re:*

LIBERTY MUTUAL PERSONAL  
INSURANCE COMPANY  
(NAIC #111-12484)

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Market Conduct Investigation No. 412467

### ORDER OF THE DIRECTOR

NOW, on this 19<sup>th</sup> day of July, 2025, Director Angela L. Nelson, after consideration and review of the Stipulation of Settlement and Voluntary Forfeiture (hereinafter "Stipulation") entered into by the Division of Insurance Market Regulation (hereinafter "Division") and Liberty Mutual Personal Insurance Company (NAIC #111-12484) (hereinafter "Liberty Mutual"), relating to the market conduct investigation no. 412467, does hereby issue the following orders:

This order, issued pursuant to §374.046.15<sup>1</sup> 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 Liberty Mutual and the Division.

**IT IS FURTHER ORDERED** that Liberty Mutual 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.

<sup>1</sup> All references, unless otherwise noted, are to Revised Statutes of Missouri 2016.

**IT IS FURTHER ORDERED** that Liberty Mutual shall pay, and the Department of Commerce and Insurance, State of Missouri, shall accept, the Voluntary Forfeiture of \$1,500.00, payable to the Missouri State School Fund.

**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 1<sup>st</sup> day of July, 2025.



  
Angela L. Nelson  
Director

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

***In Re:***

**LIBERTY MUTUAL PERSONAL  
INSURANCE COMPANY (NAIC #111-12484)**

**Market Conduct Investigation No. 412467**

**STIPULATION OF SETTLEMENT AND VOLUNTARY FORFEITURE**

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the “Division”), and Liberty Mutual Personal Insurance Company (hereinafter “Liberty Mutual”), 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**, Liberty Mutual 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 Liberty Mutual, investigation no. 412467; and

**WHEREAS**, based on the market conduct investigation of Liberty Mutual the Division alleges that:

1. Liberty Mutual did not file a violations table used in making rating plan modifications in violation of 20 CSR 500-4.100 (6) and 20 CSR 500-4.100 (1) (B).

2. Liberty Mutual used accidents in rating factors to modify premiums for comprehensive and uninsured motorist coverages in violation of §379.470<sup>1</sup> and 20 CSR 500-2.700.

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

**WHEREAS**, the Division and Liberty Mutual have agreed to resolve the issues raised in the market conduct investigation as follows:

A. **Scope of Agreement.** This Stipulation of Settlement and Voluntary Forfeiture (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.** Liberty Mutual 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. Liberty Mutual agrees to file with the Department “MO Omega 2.5 – SVC Codes by Violation Level.” Such filing shall be made within 60 days of the date of the Order approving this Stipulation. The SERFF filing shall include a statement explaining that the filing is being made as a result of a Missouri Market Conduct Investigation.

2. Liberty Mutual agrees to remove factors from its rating plans that modify premiums for comprehensive and uninsured motorist coverages due to damage caused by accidents. Such modifications shall be made within 180 days of the date of the Order approving this Stipulation. If the source of damage in the data received cannot be determined, the damage and resulting factor shall not be used. The SERFF filing shall include a statement explaining that the filing is being made as a result of a Missouri Market Conduct Investigation.

3. Liberty Mutual agrees to review all auto policies for a three year period running backwards from the date it makes its modification pursuant to Remedial Action paragraph B 2, to determine if premium for uninsured motorist or comprehensive coverage was increased as a result of damage caused by an

accident or damage with an unknown cause. If premium was increased as a result of this damage, Liberty Mutual 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 damage was not considered. Interest, in an amount to be determined pursuant to §374.191, will be included with the refund payments. Refund payments are not required to be made if the amount of the refund is \$5.00 or less. A 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 the policyholder.

C. **Compliance.** Liberty Mutual agrees to file documentation pursuant to § 374.190 with the Division, in a format acceptable to the Division, within 180 days of the entry of an Order approving this Stipulation, with updates continuing every 30 days until complete regarding any remedial action taken to implement compliance with the terms of this Stipulation, including the payment of restitution to policyholders. The Division and Liberty Mutual may mutually agree to changes in the compliance schedule set out in this paragraph. Liberty Mutual may also request extensions of time for good cause shown and the Division will consider all such requests in good faith.

D. **Voluntary Forfeiture.** Liberty Mutual agrees, voluntarily and knowingly, to surrender and forfeit the sum of \$1,500 (one thousand five hundred dollars), such sum payable to the Missouri State School Fund, in accordance with §§374.049.11 and 374.280.2, within fifteen (15) days of the date the Director of the Department (hereinafter “Director”) signs the Order approving this Stipulation.

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

F. **Waivers.** Liberty Mutual, 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. 412467.

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

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


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

J. **Counterparts.** 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.


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

L. **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: June 27, 2025

  
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Teresa Kroll  
Chief Market Conduct Examiner  
Division of Insurance Market Regulation

DATED: 6/11/2025

 in my capacity as Director of State Operations  
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Name: Alvin Peh  
Title: Director of State Operations  
Liberty Mutual Personal Insurance Company