



**IT IS FURTHER ORDERED** that the Hartford Companies 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.

**IT IS FURTHER ORDERED** that the Hartford Companies shall pay, and the Department of Commerce and Insurance, State of Missouri, shall accept, the Voluntary Forfeiture of \$30,000.00, 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 10<sup>th</sup> day of June, 2025.



  
Angela L. Nelson  
Director

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

<i>In Re:</i>	)	
	)	
<b>Trumbull Insurance Company</b>	)	<b>Market Conduct Investigation No. 449992</b>
<b>(NAIC # 27120)</b>	)	
	)	
<b>Hartford Casualty Insurance Company</b>	)	<b>Market Conduct Investigation No. 449987</b>
<b>(NAIC # 29424)</b>	)	
	)	
<b>Property and Casualty</b>	)	<b>Market Conduct Investigation No. 446834</b>
<b>Insurance Company of Hartford</b>	)	
<b>(NAIC # 34690)</b>	)	

**STIPULATION OF SETTLEMENT AND VOLUNTARY FORFEITURE**

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the “Division”), and Trumbull Insurance Company (NAIC # 27120), Hartford Casualty Insurance Company (NAIC # 29424), and Property and Casualty Insurance Company of Hartford (NAIC # 34690) (hereinafter collectively the “Hartford Companies”), 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**, the Hartford Companies have been granted a certificate of authority to transact the business of insurance in the State of Missouri;

**WHEREAS**, the Division conducted market conduct investigations of the Hartford Companies, investigation nos. 449992, 449987, and 446834; and

**WHEREAS**, based on the market conduct investigations of the Hartford Companies, the Division alleges that:

1. From July 17, 2021, to December 17, 2022, the Hartford Companies issued private

passenger automobile policies under which they would retain the Policy Expense Fee in its entirety even if the policy was cancelled mid-term, without obtaining approval from the Director for a policy form that would permit such retention of the Policy Expense Fee, in violation of § 375.920, RSMo.<sup>1</sup>

2. The Hartford Companies did not disclose to insureds on Policy Form number 8524 relevant information regarding the cancellation conditions of the policy, in violation of §§ 375.936(6)(a) and 375.934.

3. From July 17, 2021, to December 17, 2022, the Hartford Companies did not disclose to insureds that the remainder of the Policy Expense Fee would be due at the time of cancellation, in violation of §§ 375.936(6)(a) and 375.934.

**WHEREAS**, the Division and the Hartford Companies have agreed to resolve the issues raised in the market conduct investigations 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.** The Hartford Companies agree to take remedial action bringing them into compliance with the statutes and regulations of Missouri and agree to maintain those remedial actions at all times. Such remedial actions shall include the following:

1. The Hartford Companies agree to conduct an audit of all private passenger auto policies that were cancelled during the time frame of July 17, 2021, to December 17, 2022, to identify whether the policy expense fee was not pro-rated. The Hartford Companies agree to revise the premium

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

calculated on the affected policies pro-rating the Policy Expense Fee and to issue a refund of any Policy Expense Fee that was retained above the pro-rated amount together with interest in accordance with § 374.191. Any refund issued shall be accompanied by a letter stating that, as a result of a Missouri Market Conduct Investigation, it was determined that payment was owed. The Hartford Companies shall provide a list of all affected policies in a format acceptable to the Division within sixty (60) days of the date the Order is signed.

2. The Hartford Companies agree to amend their new policy form and amendatory endorsement to explain how a premium refund will be calculated on a policy that is cancelled mid-term. The Hartford Companies shall submit a copy of such revised forms to the Division for approval prior to use.

C. **Compliance.** The Hartford Companies agree to file documentation pursuant to § 374.190 with the Division, in a format acceptable to the Division, within sixty (60) days of the entry of an Order of any remedial action taken to implement compliance with the terms of this Stipulation.

D. **Voluntary Forfeiture.** The Hartford Companies agree, voluntarily and knowingly, to surrender and forfeit the sum of \$30,000.00, 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 an Order approving this Stipulation (hereinafter, “Order”).

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

F. **Waivers.** The Hartford Companies, after being advised by legal counsel, do 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 nos. 449992, 449987, and 446834.

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

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 the Hartford Companies, 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.

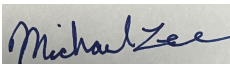
K. **Effect of Stipulation.** This Stipulation shall not become effective until the entry of an Order by the Director approving this Stipulation.

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 6, 2025

  
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Teresa Kroll  
Chief Market Conduct Examiner  
Division of Insurance Market Regulation

DATED: \_06/03/2025

  
\_\_\_\_\_  
Name: Michael Lee  
Title: Director  
Authorized for:  
Trumbull Insurance Company  
Hartford Casualty Insurance Company  
Property and Casualty Insurance Company of Hartford