



## DEPARTMENT OF COMMERCE & INSURANCE

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

*In Re:*

TRAVELERS PERSONAL  
INSURANCE COMPANY  
(NAIC #38130)

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)

Market Conduct Investigation No. 416473

### ORDER OF THE DIRECTOR

NOW, on this 16<sup>th</sup> day of December, 2025, 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 Travelers Personal Insurance Company (NAIC #38130) (hereinafter "Travelers"), relating to the market conduct investigation no. 416473, 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 Travelers and the Division.

**IT IS FURTHER ORDERED** that Travelers 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.

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<sup>1</sup> 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 16th day of December, 2025.



  
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Angela L. Nelson  
Director

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

<b><i>In Re:</i></b>	)	
	)	
<b>TRAVELERS PERSONAL INSURANCE</b>	)	<b>Market Conduct Investigation No. 416473</b>
<b>COMPANY (NAIC #38130)</b>	)	
	)	
	)	

**STIPULATION OF SETTLEMENT**

It is hereby stipulated and agreed by the Division of Insurance Market Regulation (hereinafter the “Division”) and Travelers Personal Insurance Company (hereinafter “Travelers”), 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**, Travelers 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 Travelers, investigation no. 416473; and

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

1. In one instance, Travelers did not acknowledge pertinent communications or provide an appropriate reply within 10 working days to communications from a claimant that reasonably suggested a response was expected, implicating the provisions of §375.1007 (2)<sup>1</sup> and in violation of 20 CSR 100-1.030 (1) (B).

2. In four instances, Travelers did not advise the insured of the acceptance or denial of the claim

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

within 15 working days of the submission of necessary documentation, implicating the provisions of §375.1007 (3) and in violation of 20 CSR 100-1.050 (1) (A).

3. In three instances, Travelers did not notify the insured within 15 working days of gathering all information needed to establish the nature and extent of the claim or the reasons additional time was needed to investigate the claim, implicating the provisions of §375.1007 (3) and in violation of 20 CSR 100-1.050 (1) (C).

4. In two instances, Travelers did not provide a reasonable and accurate written explanation to the insured for the basis of the claim denial, implicating the provisions of §375.1007 (12) and in violation of 20 CSR 100-1.050 (1) (A).

5. In one instance, Travelers claim denial did not include the specific provision in the policy supporting the denial or the policy period or effective dates of the policy, in violation of 20 CSR 100-1.050 (1) (A).

6. In five instances, Travelers did not effectuate prompt settlement of claims when investigations and claim payments were delayed, implicating the provisions of §375.1007 (4) and in violation of 20 CSR 100-1.050 (1) (C).

7. In two instances, Travelers did not maintain records in a manner that clearly showed the inception, handling, and disposition of the claim by not including file notes of inspections and claim denials, in violation of §374.205.2 (2) and 20 CSR 100-8.040 (3) (B).

**WHEREAS**, the Division and Travelers have agreed to resolve the issues raised in the market 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.** Travelers 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. Travelers agrees to adopt and implement policies and procedures to ensure that the Company's claim handling is compliant with §375.1007 (2), (3), (4) and (12), and with 20 CSR 100-1.030 (1) (B), 20 CSR 100-1.050 (1) (A) and 20 CSR 100-1.050 (1) (C).

2. Travelers agrees to adopt and implement policies and procedures to ensure that claim files include documentation when inspections occur and include written claim denials.

C. **Compliance.** Travelers agrees to file documentation pursuant to §374.190 with the Division of any remedial action taken to implement compliance with the terms of this Stipulation. The documentation shall be in a format acceptable to the Division and be filed within 60 days of the entry of an Order approving this Stipulation, unless a different timeframe is specified in Section B.

D. **Non-Admission.** Nothing in this Stipulation shall be construed as an admission by Travelers, 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.** Travelers, 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. 416473.

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

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 Travelers, 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.

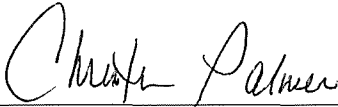
J. **Effect of Stipulation.** This Stipulation shall not become effective until entry of an Order by the Director approving this Stipulation.

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: December 11, 2025

  
\_\_\_\_\_  
Teresa Kroll  
Chief Market Conduct Examiner  
Division of Insurance Market Regulation

DATED: 12/5/25

  
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Christine Palmieri  
Vice President Corporate Compliance  
& Market Regulation  
Travelers Personal Insurance Company