



Kansas Department of Insurance

Commissioner Vicki Schmidt

In the Matter of)
 THE TRAVELERS HOME AND MARINE)
 INSURANCE COMPANY,)
 NAIC # 27998)
)
 THE TRAVELERS INDEMNITY)
 COMPANY OF AMERICA,)
 NAIC # 25666)
)
 THE STANDARD FIRE INSURANCE)
 COMPANY,)
 NAIC # 19070)
)
 THE AUTOMOBILE INSURANCE)
 COMPANY OF HARTFORD, CONNECTICUT,)
 NAIC # 19062)

Docket No. 110756

CONSENT AGREEMENT AND FINAL ORDER

Pursuant to K.S.A. 40-103, K.S.A. 40-951 *et seq.*, K.S.A. 40-2,125, and in accordance with K.S.A. 77-501 *et seq.*, the Commissioner of Insurance has the general supervision, control and regulation of corporations, companies, associations, societies, exchanges, partnerships, or persons authorized to transact the business of insurance, indemnity or suretyship in this state and shall have the power to make all reasonable rules and regulations necessary to enforce the laws of this state relating thereto. If any person has engaged in or is engaging in any act or practice constituting a violation of the any provision of Kansas insurance statutes or any rule and regulation or order thereunder, the Commissioner may, in the exercise of discretion order such remedies as payment of monetary penalties, suspension or revocation of licenses or certificates, or issuing cease and desist order or such other affirmative action to carry out the purposes of the violated provision. The companies named above are currently licensed as insurance companies in the State of Kansas.

Now, to resolve this matter, the Commissioner and the companies hereby agree to the following:

1. The Travelers Home and Marine Insurance Company, The Travelers Indemnity Company of America, The Automobile Insurance Company of Hartford, Connecticut, and The Standard Fire Insurance Company (together "Companies") have been advised that, pursuant to K.S.A. 77-537 and K.S.A. 77-542, a company

has a right to a hearing before the Commissioner may impose any sanctions or penalties; at a hearing, the company would be entitled to appear in person, to be represented by an attorney or other representative who is permitted to practice before the agency, to present its position, arguments or contentions in writing and to present evidence and examine witnesses appearing for and against it. The Companies hereby waive all such rights.

2. The Companies hereby waive any and all rights each may have under the Kansas Administrative Procedure Act, K.S.A. 77-501 *et seq.* and the Kansas Judicial Review Act, K.S.A. 77-601 *et seq.* to seek administrative or judicial review of this Consent Order.
3. The Companies consent to the jurisdiction of the Commissioner and the Kansas Department of Insurance (“Department”) to determine the issues set forth herein. The companies expressly waive any prerequisites to jurisdiction that may exist.
4. The Companies neither admit nor deny the following statement of facts, but acknowledge that the Commissioner has sufficient evidence to introduce at an administrative hearing that the following facts occurred or are occurring:
 - The Companies wrote boat policies in Kansas under the “Travelers Boat Program” and “Travelers Quantum Boat Program” moniker. The forms utilized by the Companies are identical. The Companies discovered that the forms utilized were not approved by the Department prior to their use. The Companies reported this matter to the Department to make way for a new program that they wanted to implement in October of 2024.
 - The Companies, as part of the Department’s review, failed to timely respond to inquiries by the Department.
5. The Companies neither admit nor deny the following statutes were violated, but acknowledges the applicability of the same:
 - K.S.A. 40-955 – requiring insurers to file with the Commissioner every manual of classifications, rules and rates, every rating plan, policy form and every modification of any of the foregoing which it proposes to use. Every such filing shall indicate the proposed effective date and the character and extent of the coverage contemplated and shall be accompanied by the information upon which the insurer supports the filings.

- K.S.A. 40-216 – requiring every personal lines contract of insurance or indemnity issued or delivered in this state to be filed with the commissioner.
 - K.S.A. 40-2, 125 – requiring that insurers whom receive an inquiry from the Department must respond.
6. The Companies agree to pay the monetary penalty listed below. Payment is due within thirty (30) days after the effective date of this Consent Order. Such penalty is assessed jointly and severally against the Companies:
- \$4,000
7. In addition, the Companies agree to take such other affirmative action as specified below:
- The Companies have made corrective filings and now have rates approved for use in Kansas. The Companies will advise the Department promptly of any changes to rates and will comply with filing and approval requirements.
8. The Companies have read and understand this Consent Order. The Companies further understand that it has the right to retain counsel of its choice and have counsel review this Consent Order. The Companies agree to the entry of this order as a final order without need for a hearing under the Kansas Administrative Procedures Act.
9. The Companies agree that if any company fails to comply with the terms of this Consent Order, the Commissioner may take action to gain compliance with the Consent Order including, but not limited to, issuing such ancillary orders and suspending the company's license until it has complied.
10. The Companies waive any and all causes of action, claims or rights, known and unknown which each may have against the Department, and any employees, agents, consultants, contractors or officials of the Department, in their individual and official capacities, as a result of any acts or omissions on the part of such persons or firms.
11. The Companies agree to be served a copy of this fully executed Consent Order electronically or by regular U.S. Mail.
12. The Companies acknowledge that this Consent Order may be published on the website of the Kansas Department of Insurance. The Companies understand and

acknowledge that this Consent Order is a public document pursuant to the Kansas Open Records Act, K.S.A. 45-215 *et seq.*

The undersigned stipulates and agrees to the above findings, facts, and conclusions of law and waives their rights to an administrative hearing and judicial review of the Commissioner's Order. The undersigned also affirms they are authorized to enter into this consent agreement and final order on behalf of the below named company.

For The Travelers Home and Marine Insurance Company:

Christine Palmieri
Company Representative Name (Print)

27998
NAIC Number

Christine Palmieri

11/21/2024

Company Representative Name Signature

Date

The undersigned stipulates and agrees to the above findings, facts, and conclusions of law and waives their rights to an administrative hearing and judicial review of the Commissioner's Order. The undersigned also affirms they are authorized to enter into this consent agreement and final order on behalf of the below named company.

For The Travelers Indemnity Company of America:

Christine Palmieri
Company Representative Name (Print)

25666
NAIC Number

Christine Palmieri

11/21/2024

Company Representative Name Signature

Date

The undersigned stipulates and agrees to the above findings, facts, and conclusions of law and waives their rights to an administrative hearing and judicial review of the Commissioner's Order. The undersigned also affirms they are authorized to enter into this consent agreement and final order on behalf of the below named company.

For The Standard Fire Insurance Company:

Christine Palmieri
Company Representative Name (Print)

19070
NAIC Number

Christine Palmieri
Company Representative Name Signature

11/21/2024
Date

The undersigned stipulates and agrees to the above findings, facts, and conclusions of law and waives their rights to an administrative hearing and judicial review of the Commissioner's Order. The undersigned also affirms they are authorized to enter into this consent agreement and final order on behalf of the below named company.

For The Automobile Insurance Company of Hartford, Connecticut:

Christine Palmieri
Company Representative Name (Print)

19062
NAIC Number

Christine Palmieri
Company Representative Name Signature

11/21/2024
Date

ORDER

IT IS THEREFORE ORDERED BY THE COMMISSIONER OF INSURANCE THAT:

1. The Travelers Home and Marine Insurance Company, The Travelers Indemnity Company of America, The Automobile Insurance Company of Hartford, Connecticut, and The Standard Fire Insurance Company, jointly and severally, shall pay a monetary penalty of \$4,000.
2. The monetary penalty of \$4,000 shall be paid in full within 30 days of the effective date of this Order. Failure to pay will result in the issuance of such further action or orders as the Commissioner deems necessary.
3. This Order shall take effect when signed by all parties and the Commissioner or the Commissioner's designee and filed of record with the Kansas Department of Insurance.

**IT IS SO ORDERED THIS 21ST DAY OF NOVEMBER , IN THE CITY OF
TOPEKA, COUNTY OF SHAWNEE, STATE OF KANSAS.**



VICKI SCHMIDT
COMMISSIONER OF INSURANCE

BY: 
Ben Miller-Coleman
Chief Compliance Counsel

Certificate of Service

The undersigned hereby certifies that she served the above and foregoing Consent Agreement and Final Order on this 21st day of November, 2024 by causing the same to be deposited in the United States Mail, first class postage prepaid, addressed to the following:

The Traveler's Home and Marine Insurance Company
The Traveler's Indemnity Company of America
The Standard Fire Insurance Company
The Automobile Insurance Company of Hartford, Connecticut
One Tower Square
Hartford, CT 06183

And was provided via electronic mail to:

Laura Maples, Director of State Product Services and Product
Development
lmaples@travelers.com


Toni Garrard
Legal Assistant