



# Illinois Department of Insurance

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Bruce Rauner  
Governor

Anne Melissa Dowling  
Acting Director

June 21, 2016

Frederick Allen Edmond Jr., President  
Frankenmuth Mutual Insurance Company  
Ansur America Insurance Company  
One Mutual Avenue  
Frankenmuth, MI 48787-0001

**Re:** Ansur America Insurance Company, NAIC # 10984  
Frankenmuth Mutual Insurance Company, NAIC # 13986  
***Market Conduct Examination Report Closing Letter***

Dear Mr. Edmond:

The Department is in receipt of your Companies' payment of the \$26,600.00 civil forfeiture. The Department has also reviewed the proof of compliance received and deems it adequate and sufficient. Therefore, the Department is closing its file on this exam.

I intend to ask the Director to make the Examination Report available for public inspection as authorized by 215 ILCS 5/132. At the Department's discretion, specific content of the report may be subject to redaction for private, personal, or trade secret information prior to making the report public. However, any redacted information will be made available to other regulators upon request.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jack Engle".

Jack Engle, MCM  
Assistant Deputy Director-Market Conduct and Analysis  
Illinois Department of Insurance  
320 West Washington- 5th Floor  
Springfield, IL 62767  
217-558-1058  
E-mail: [Jack.Engle@Illinois.gov](mailto:Jack.Engle@Illinois.gov)

**Frankenmuth Mutual Insurance Company**  
**Ansur America Insurance Company**

## MARKET CONDUCT EXAMINATION REPORT

DATE OF EXAMINATION: October 19, 2015 through January 7, 2016

EXAMINATION OF: Frankenmuth Mutual Insurance Company  
(P & C Foreign) NAIC #13986  
Ansur America Insurance Company  
(P & C Foreign) NAIC #10984

LOCATION: One Mutual Avenue  
Frankenmuth, Michigan 48787

PERIOD COVERED BY EXAMINATION: August 1, 2014 through July 31, 2015

EXAMINERS: William Fisher, Regulatory Examination Consultants, LTD  
Examiner-in-Charge  
Sarah Bridendall, Regulatory Examination Consultants, LTD

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I. SUMMARY

A market conduct examination of Frankenmuth Mutual Insurance Company and Ansur America Insurance Company was performed to determine compliance with Illinois statutes and the Illinois Administrative Code.

The following represent general findings, however specific details are found in each section of the report.

<b>TABLE OF TOTAL VIOLATIONS</b>						
<b>Crit #</b>	<b>Statute/ Rule</b>	<b>Description of Violation</b>	<b>Population</b>	<b>Files Reviewed</b>	<b># of Violations</b>	<b>Error %</b>
3	215 ILCS 5/141.01	The Company non-renewed a policy due to the agent no longer representing the Company.	4	4	1	25.0%
4	215 ILCS 5/457(1)	The Company used rates found in the underwriting guidelines dated 1/1/2015 rather than the rates filed effective 11/1/2014. The rate change effective 1/1/2015 was not filed for use.	178	21	8	38.1%
4	215 ILCS 5/462b	First year workers' compensation rates were overcharged based on the use of 1/1/2015 unfiled rates.	178	21	2	9.5%
5	215 ILCS 5/457(1)	The Company used rates found in the underwriting guidelines dated 1/1/2015 rather than the rates filed effective 11/1/2014. The rate change effective 1/1/2015 was not filed for use.	551	74	12	16.2%
5	215 ILCS 5/462b	One policy's renewal year workers' compensation rates were overcharged based on the use of 1/1/2015 unfiled rates.	551	74	1	1.6%
6	215 ILCS 5/500-15	The Company accepted business from an unlicensed producer.	178	21	1	4.8%
6	215 ILCS 5/500-80	The Company paid commissions to an unlicensed producer.	178	21	1	4.8%
7	215 ILCS 5/143c	Policy forms in use do not include notice of the address of the company complaint dept and address of Public Service Division of IL DOI.	171	15	15	100%
7	215 ILCS 5/143c	Policy forms in use do not include notice of the address of the company complaint dept and address of Public Service Division of IL DOI.	870	80	80	100%
7	215 ILCS 5/143c	Policy forms in use do not include notice of the address of the company complaint dept and address of Public Service Division of IL DOI.	178	21	21	100%

7	215 ILCS 5/143c	Policy forms in use do not include notice of the address of the company complaint dept and address of Public Service Division of IL DOI.	551	74	74	100%
8	215 ILCS 5/500-15	The Company accepted business from an unlicensed producer.	171	15	1	6.7%
8	215 ILCS 5/500-80	The Company paid commissions to an unlicensed producer.	171	15	1	6.7%
11	215 ILCS 5/154.6(d)	The Company failed to pay appropriate sales tax resulting in underpayments totaling \$988.39.	26	26	8	30.8%
13	50 Ill. Adm. Code 919.80(c)(2)(C)	The Company documentation contained quotes from dealers over 50 miles away.	26	26	1	3.8%
14	50 Ill. Adm. Code 919.80(c)(2)	The Company's claim files did not contain copies of the Total Loss Evaluation to support the settlement of the claims.	26	26	1	3.8%
15	50 Ill. Adm. Code 919.30	The Company's supporting documentation for claims paid was not maintained.	306	39	1	2.6%
15	820 ILCS 305/8.2(d)(1)	The Company paid a claim in excess of thirty (30) days from the date received.	306	39	1	2.6%
15	820 ILCS 305/8.2(d)(3)	The Company did not pay interest on a late claim.	306	39	1	2.6%
16	820 ILCS 305/19(o)	The Company did not make workers' compensation monthly and annual reporting to the employer.	306	39	39	100.0%

Criticism 7 includes three (3) violations (1 of 80; 2 of 74) and criticism 16 includes one (1) violation (1 of 39) for Ansur America Insurance Company. All other violations cited are for Frankenmuth Mutual Insurance Company.

## II. BACKGROUND

### Frankenmuth Mutual Insurance Company

This Company was incorporated on September 15, 1921, under the laws of the state of Michigan and began business on March 21, 1922.

The Company is a mutual company owned by its policyholders.

Senior Management consists of: John S. Benson, Chairman and Chief Executive Officer, Frederick A. Edmond, Jr., President and Chief Operating Officer, and Brian S. McLeod, Vice President, Treasurer and Secretary.

The following lines of business were selected by the Illinois Department of Insurance to be included in this examination period (August 1, 2014 through July 31, 2015):

A/S Line	Line	Direct premium written	Direct losses paid
16	Workers' Compensation	\$7,313,807	\$2,778,673
19.4	Other commercial auto liability	\$2,546,759	\$2,060,623
21.2	Commercial auto physical damage	\$861,014	\$508,021

### Ansur America Insurance Company

This Company was incorporated on April 26, 1999, under the laws of the state of Michigan and began business on October 29, 1999.

The Company is a wholly owned subsidiary of the Frankenmuth Mutual Insurance Company.

Senior Management consists of: John S. Benson, Chairman and Chief Executive Officer, Frederick A. Edmond, Jr., President and Chief Operating Officer, and Brian S. McLeod, Vice President, Treasurer and Secretary.

The following lines of business were selected by the Illinois Department of Insurance to be included in this examination period (August 1, 2014 through July 31, 2015):

A/S Line	Line of Business	Direct premiums written	Direct losses paid
16	Workers' Compensation	\$51,323	\$48,858
19.4	Other commercial auto liability	\$539	\$1,716
21.2	Commercial auto physical damage	\$178	\$0

### III. METHODOLOGY

The market conduct examination places emphasis on an insurer's systems and procedures used in dealing with insureds and claimants. The scope of this market conduct examination was limited to the following general areas:

1. Risk Selection
2. Underwriting
3. Claims
4. Producer Review

The review of these categories is accomplished through examination of individual underwriting and claim files, written interrogatories and interviews with company personnel. Each of these categories is examined for compliance with Department of Insurance rules and regulations and applicable state laws.

The following methods were used to obtain the required samples and to assure a statistically sound selection. Statistical samples of randomly selected policies/claims were selected for review except where the small population resulted in 100% sampling or a judgmental sample size of randomly selected policies/claims.

#### 1. Risk Selection

Cancellations and nonrenewals of existing policy holders were requested on the basis of the effective date of the transaction falling within the period under examination. Cancellations and nonrenewals were reviewed for their compliance with statutory requirements, the accuracy and validity of reasons given and for any possible discrimination.

#### 2. Underwriting

The underwriting of new applicants for coverage with the company was selected based on the inception date of the policy falling within the period under examination. New policies were reviewed for rating accuracy, use of filed rates, use of filed forms, for compliance with company underwriting guidelines and to ensure that the coverage provided was as requested by the applicant.

#### 3. Claims

Claims were requested based on the settlement occurring or the claim file being closed without payment within the period under examination.

All claims were reviewed for compliance with policy contracts and endorsements, applicable sections of the Illinois Insurance Code (215 ILCS 5/1 *et seq.*), the Illinois Administrative Code and the Illinois Workers' Compensation Act (820 ILCS 305/1 *et seq.*).



4. Producer Review

Producer licensing was reviewed for compliance with statutory and licensing requirements. The Company's File of Active Producers was incomplete and either did not reflect the correct effective or expiration date or did not have any information as to effective date or expiration date. Exceptions noted have been incorporated into the segment commentary.

IV. SELECTION OF SAMPLE

<u>Survey</u>	<u>Population</u>	<u># Reviewed</u>	<u>% Reviewed</u>
Risk Selection:			
Commercial Automobile Cancellations	112	48	42.9%
Commercial Automobile Nonrenewals	1	1	100.0%
Workers' Compensation Cancellations	83	47	56.6%
Workers' Compensation Nonrenewals	4	4	100.0%
Producer Licensing	498	138	27.7%
Underwriting:			
Commercial Automobile – New	171	15	8.8%
Commercial Automobile – Renewal	870	80	9.2%
Workers' Compensation – New	178	21	11.8%
Workers' Compensation – Renewal	551	74	13.4%
Claims:			
Commercial Automobile First Party Paid	142	39	27.5%
Commercial Automobile First Party Closed Without Payment	68	29	42.6%
Commercial Automobile Third Party Paid	97	39	40.2%
Commercial Automobile Third Party Closed Without Payment	37	10	27.0%
Commercial Automobile Subrogation	33	10	30.3%
Commercial Automobile Total Losses	26	26	100.0%
Workers' Compensation Paid	306	39	12.7%
Workers' Compensation Closed Without Payment	15	15	100.0%

## V. FINDINGS

### A. Risk Selections

1. Commercial Automobile - Cancellations  
A review of forty-eight cancellations produced no criticisms.
2. Commercial Automobile - Nonrenewals  
A review of one (1) non-renewed policy file produced no criticisms.
3. Workers' Compensation - Cancellations  
A review of forty-six cancellations produced no criticisms.
4. Workers' Compensation - Nonrenewals  
A review of four (4) non-renewed policy files produced one (1) criticism for one (1) violation (25% of 4 files reviewed). In one (1) file the sole reported reason for the non-renewal was because the agent no longer represented the Company. This reason for non-renewal is in violation of 215 ILCS 5/141.01.

### B. Underwriting

1. Commercial Automobile - New Business  
A review of fifteen underwriting files produced three (3) criticisms with an aggregate of 17 violations:
  - 100% of the fifteen policies reviewed were in violation of 215 ILCS 5/143c, because the policy forms in use do not include the notice of the address of the company complaint department & address of the Public Service Division of the Illinois Department of Insurance.
  - One (1) of the fifteen policies reviewed (6.7%) was in violation of 215 ILCS 5/500-15, because the producer on the application was not licensed with the Illinois Department of Insurance.
  - One (1) of the fifteen policies reviewed (6.7%) was in violation of 215 ILCS 5/500-80, because the commissions were paid to an unlicensed producer.
2. Commercial Automobile - Renewals  
A review of eighty underwriting files produced one (1) criticism with eighty violations. 100% of the eighty files reviewed were in violation of 215 ILCS 5/143c, because the policy forms in use do not include the notice of the address of the company complaint department & address of the Public Service Division of the Illinois Department of Insurance.
3. Workers' Compensation - New Business  
A review of twenty-one underwriting files produced five (5) criticisms with an aggregate of 33 violations:
  - Eight (8) of the 21 policies reviewed (38.1%) were not in accordance with 215 ILCS 5/457(1), because the Company used rates found in the underwriting guidelines dated 1/1/2015 rather than the rates filed effective

11/2014. The rate change effective 1/1/2105 was not filed for use at the time the rate was used.

- Two (2) of the 21 policies reviewed (9.5%) were not in accordance with 215 ILCS 5/462b, because the Company overcharged the insured based on the use of rates not filed and premium refunds were not made timely.
- One (1) of the 21 policies reviewed (4.8%) was in violation of 215 ILCS 5/500-15, because the producer on the application was not licensed with the Illinois Department of Insurance.
- One (1) of the 21 policies reviewed (4.8%) was in violation of 215 ILCS 5/500-80, because commissions were paid to an unlicensed producer.
- 100% of the 21 policies reviewed were in violation of 215 ILCS 5/143c, because the policy forms in use do not include the notice of the address of the company complaint department & address of the Public Service Division of the Illinois Department of Insurance.

4. Workers' Compensation - Renewals

A review of seventy-four underwriting files produced three (3) criticisms with an aggregate of 87 violations:

- Twelve of the 74 policies reviewed (16.2%) were not in accordance with 215 ILCS 5/457(1), because the Company used rates found in the underwriting guidelines dated 1/1/2015 rather than the rates filed effective 11/2014. The rate change effective 1/1/2105 was not filed for use at the time the rate was used.
- One (1) of the 74 policies reviewed (1.6%) was not in accordance with 215 ILCS 5/462b, because the Company overcharged the insured based on the use of rates not filed and premium refunds were not made timely.
- 100% of the 74 policies reviewed were in violation of 215 ILCS 5/143c, because the policy forms in use do not include the notice of the address of the company complaint department & address of the Public Service Division of the Illinois Department of Insurance.

C. Claims

1. Commercial Automobile - First Party Paid Claims

A review of thirty-nine claims paid produced no criticisms.

2. Commercial Automobile - First Party Closed without Payment Claims

A review of twenty-nine claims closed without payment produced no criticisms.

3. Commercial Automobile - Third Party Paid Claims

A review of thirty-nine claims paid produced no criticisms.

4. Commercial Automobile - Third Party Closed without Payment Claims

A review of ten claims closed without payment produced no criticisms.

5. Commercial Automobile - Subrogation

A review of ten subrogation claims produced no criticisms.

6. Commercial Automobile - Total Losses

A review of twenty-six claims paid on total losses produced three (3) criticisms with an aggregate of 10 violations:

- Eight (8) of the 26 claims reviewed (30.8%) were not in accordance with 215 ILCS 5/154.6(d), because the Company failed to pay the appropriate sales tax which resulted in underpayments totaling \$988.39.
- One (1) of the 26 claims reviewed (3.8%) was in violation of 50 Ill. Adm. Code 919.80(c)(2)(C), because the documentation of quotes obtained for recently sold vehicles were from dealers over 50 miles away.
- One (1) of the 26 claims reviewed (3.8%) was not in accordance with 50 Ill. Adm. Code 919.80(c)(2), because the Company's claim file did not contain copies of the total Loss Evaluation to support settlement of the claim.

7. Workers' Compensation - Claims Paid

A review of thirty-nine claim files produced four (4) criticisms with an aggregate of 42 violations:

- One (1) of the 39 claims reviewed (2.6%) was in violation of 50 Ill. Adm. Code 919.30, because the Company did not maintain the required supporting documentation for claims paid.
- One (1) of the 39 claims reviewed (2.6%) was in violation of 820 ILCS 305/8.2(d)(1), because the Company did not pay the provider for treatment provided within 30 days of receipt of the bill as required.
- One (1) of the 39 claims reviewed (2.6%) was in violation of 820 ILCS 305/8.2(d)(3), because the Company did not pay interest to the provider for the late claim payment as required.
- 100% of the 39 claims reviewed were in violation of 820 ILCS 305/8.19(o), because the Company did not provide monthly and annual reporting to the employer/insured as required.

8. Workers' Compensation - Closed without Payment Claims

A review of fifteen claims closed without payment produced no criticisms.

D. Producer Licensing

A review of producer licensing indicates the Company does not maintain accurate and up to date records of its active producers and their license status, so the Company is not able to determine if business is being written by unlicensed producers which is a violation of 215 ILCS 5/500-15.

E. Complaints

There were no Department Complaints or Consumer Complaints during or subsequent to the examination period for business included in this examination scope.

VI. INTERRELATED FINDINGS

The Company has practices in place with respect to commercial automobile total losses:

“We normally download the Comprehensive Report and provide it to the vehicle owner upon request”. The Company’s practice is not in compliance with 50 Ill. Adm. Code 919.80(c)(2)(F).

“We inform total loss vehicle owners verbally of the settlement breakdown, including ACV, sales tax, title fees and transfer fees. We provide this information in writing if requested by the owner. We do not provide written notification to claimants advising of the Right of Recourse provisions. We plan to develop a letter to document this in writing”. The Company’s practice is not in compliance with 50 Ill. Adm. Code 919.80(c)(2)(F).

STATE OF ILLINOIS            )  
  ) ss  
COUNTY OF COOK            )

William Fisher, Regulatory Examination Consultants, LTD, being first duly sworn upon his oath, deposes and says:

That he was appointed by the Director of Insurance of the State of Illinois (the "Director") as Examiner-In Charge to examine the insurance business and affairs of Frankenmuth Mutual Insurance Company, NAIC 13986, and Ansur American Insurance Company, NAIC 10984, (collectively known as the "Company");

That the Examiner-In-Charge was directed to make a full and true report to the Director of the examination with a full statement of the condition and operation of the business and affairs of the Company with any other information as shall in the opinion of the Examiner-In-Charge be requisite to furnish the Director with a statement of the condition and operation of the Company's business and affairs and the manner in which the Company conducts its business;

That neither the Examiner-In-Charge nor any other persons so designated nor any members of their immediate families is an officer of, connected with, or financially interested in the Company nor any of the Company's affiliates other than as a policyholder or claimant under a policy or as an owner of shares in a regulated diversified investment company, and that neither the Examiner-In-Charge nor any other persons so designated nor any members of their immediate families is financially interested in any other corporation or person affected by the examination;

That an examination was made of the affairs of the Company pursuant to the authority vested in the Examiner-In-Charge by the Director of Insurance of the State of Illinois;

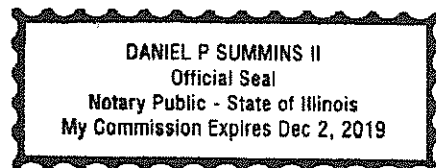
That he was the Examiner-in-Charge of said examination and the attached report of examination is a full and true statement of the condition and operation of the insurance business and affairs of the Company for the period covered by the Report as determined by the examiners;

That the Report contains only facts ascertained from the books, papers, records, or documents, and other evidence obtained by investigation and examined or ascertained from the testimony of officers or agents or other persons examined under oath concerning the business, affairs, conduct, and performance of the Company.

William Fisher  
Examiner-In-Charge

Subscribed and sworn to before me  
this 15<sup>th</sup> day of January, 2016

[Signature]  
Notary Public



STATE OF ILLINOIS  
DEPARTMENT OF INSURANCE



IN THE MATTER OF:

ANSUR AMERICA INSURANCE COMPANY, NAIC 10984 and  
FRANKENMUTH MUTUAL INSURANCE COMPANY, NAIC 13986  
ONE MUTUAL AVENUE  
FRANKENMUTH, MI 48787-0001

STIPULATION AND CONSENT ORDER

WHEREAS, the Acting Director of the Illinois Department of Insurance ("Department") is a duly authorized and appointed official of the State of Illinois, having authority and responsibility for the enforcement of the insurance laws of this State; and

WHEREAS, Ansur America Insurance Company, NAIC 10984, and Frankenmuth Mutual Insurance Company, NAIC 13986 ("Companies"), are authorized under the insurance laws of this State and by the Acting Director to engage in the business of soliciting, selling and issuing insurance policies; and

WHEREAS, a Market Conduct Examination of the Companies was conducted by a duly qualified examiner of the Department pursuant to Sections 132, 401, 402, 403, 407, and 425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402, 5/403, 5/407, and 5/425); and

WHEREAS, as a result of the Market Conduct Examination, the Department examiner filed a Market Conduct Examination Report which is an official document of the Department; and

WHEREAS, the Market Conduct Examination Report cited various areas in which the Companies were not in compliance with the Illinois Insurance Code (215 ILCS 5/1 *et seq.*), Workers' Compensation Act (820 ILCS 305/1 *et seq.*) and Department Regulations (50 Ill. Adm. Code 101 *et seq.*); and

WHEREAS nothing herein contained, nor any action taken by the Companies in connection with this Stipulation and Consent Order, shall constitute, or be construed as, an admission of fault, liability or wrongdoing of any kind whatsoever by the Companies; and

WHEREAS, the Companies are aware of and understand their various rights in connection with the examination and report, including the right to counsel, notice, hearing and appeal under Sections 132, 401, 402, 407, and 407.2 of the Illinois Insurance Code and 50 Ill. Adm. Code 2402; and

WHEREAS, the Companies understand and agree that by entering into this Stipulation and Consent Order, they waive any and all rights to notice and hearing; and

WHEREAS, the Companies and the Acting Director, for the purpose of resolving all matters raised by the report and in order to avoid any further administrative action, hereby enter into this Stipulation and Consent Order.

NOW, THEREFORE, IT IS AGREED by and between the Companies and the Acting Director as follows:

1. The Market Conduct Examination indicated various areas in which the Companies were not in compliance with provisions of the Illinois Insurance Code and Department Regulations; and
2. The Acting Director and the Companies consent to this Order requiring the Companies to take certain actions to come into compliance with provisions of the Illinois Insurance Code and Department Regulations.

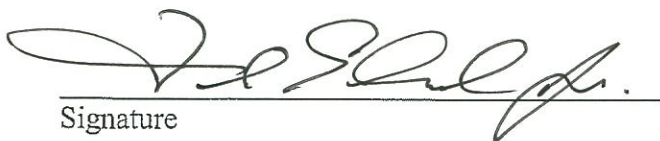
THEREFORE, IT IS HEREBY ORDERED by the undersigned Acting Director that the Companies shall:

1. Institute and maintain policies and procedures whereby the Companies shall not cancel, terminate or refuse to renew any policy on the grounds that the contract with the agent has been terminated as required by 215 ILCS 5/141.01.
2. Institute and maintain policies and procedures whereby the Companies shall notify each insured employer by the 15th day of each month of any compensable claim incurred during the preceding month and the amounts paid or reserved on the claim, including a summary of the claim and a brief statement of the reasons for compensability. The Companies shall also furnish to each insured employer a cumulative report of all claims incurred during the preceding calendar year or continued from the previous year by the 30th day of that calendar year as required by 820 ILCS 305/19(o).
3. Institute and maintain policies and procedures whereby the Companies shall pay claims accurately and completely by paying appropriate sales tax as required by 215 ILCS 5/154.6(d).
4. Institute and maintain policies and procedures whereby the Companies shall file with the Director every manual of classifications, every manual of rules and rates, every rating plan and every modification of the foregoing which it intends to use not later than 30 days after they become effective as required by 215 ILCS 5/457(1).
5. Institute and maintain policies and procedures whereby the Companies' policy forms shall provide written notice of the address of its complaint department and the address of the Public Service Division of the Department of Insurance as required by 215 ILCS 5/143(c).
6. Submit to the Acting Director of Insurance, State of Illinois, proof of compliance with the above five (5) orders within 30 days of execution of this Order.
7. Pay to the Acting Director of Insurance, State of Illinois, a civil forfeiture in the amount of \$26,600 to be paid within 30 days of execution of this Order.



NOTHING contained herein shall prohibit the Acting Director from taking any and all appropriate regulatory action as set forth in the Illinois Insurance Code, including but not limited to levying additional forfeitures, should the Companies violate any of the provisions of this Stipulation and Consent Order or any provisions of the Illinois Insurance Code or Department Regulations.

On behalf of **ANSUR AMERICA INSURANCE COMPANY** and  
**FRANKENMUTH MUTUAL INSURANCE COMPANY**



Signature


Frederick A. Edmond, Jr.

Name

President and Chief Operating Officer

Title

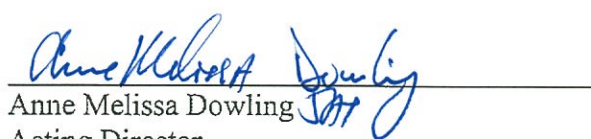
Subscribed and sworn to before me this  
9th day of May 2016.

  
Notary Public Dianne L. Voss  
Saginaw County, Michigan  
My Commission expires: July 23, 2018



DEPARTMENT OF INSURANCE of the  
State of Illinois:

DATE June 3, 2016

  
Anne Melissa Dowling  
Acting Director

