



Illinois Department of Insurance

BRUCE RAUNER
Governor

JENNIFER HAMMER
Director

VIA ELECTRONIC MAIL

January 22, 2018

Ms. Flor Maria Loya
President
Loya Insurance Company
1800 Lee Trevino Drive, Suite 201
El Paso, TX 79936-4117

Re: Loya Insurance Company, NAIC 11198
Market Conduct Examination Report Closing Letter

Dear Ms. Loya:

The Department has reviewed your Company's proof of compliance 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 and Stipulation and Consent Order 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,

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

**ILLINOIS DEPARTMENT OF INSURANCE
MARKET CONDUCT EXAMINATION OF**

LOYA INSURANCE COMPANY

MARKET CONDUCT EXAMINATION REPORT

DATE OF EXAMINATION: August 12, 2016 through January 30, 2017

EXAMINATION OF: Loya Insurance Company
(P&C Foreign) NAIC #11198

LOCATION: 1800 Lee Trevino Drive, Suite 201
El Paso, TX 79936-4117

PERIOD COVERED BY
EXAMINATION: July 1, 2015 through June 30, 2016

EXAMINERS: Josephine Sitter
June Coleman, Examiner-in-Charge

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I. SUMMARY

A comprehensive market conduct examination of Loya Insurance Company (hereinafter referred to as “the Company”) was performed to determine compliance with Illinois statutes and the Illinois Administrative Code. The line of business reviewed was private passenger automobile.

The following table represents general findings with specific details in each section of the report.

Table of Total Violations						
Crit No.	Statute/Rule	Description of Violations	Population	Files Reviewed	No. of Violations	Error %
01	50 Ill. Adm. Code 926.40(b)(1)	The Company failed to address insured’s concern of supplemental costs in its response to the Department complaint. (Complaints – DOI)	25	25	1	4.00%
02	50 Ill. Adm. Code 926.50	The Company failed to include identification number, function code, line type, Insurance Department Complaint and State of Origin in the telephone consumer complaint register. (Complaints – Consumer)	17	17	11	64.71%
03	215 ILCS 5/143.12a(b)(1)	The Company failed to refund unearned premium within 30 days from the date of the notice of cancellation by the Company. (PPA 60 Day and Midterm Cancellations)	254	84	72	85.71%
07	215 ILCS 5/143.15	The Company failed to mail a notice of cancellation for nonpayment of premium ten days prior to the effective date of the cancellation. (PPA Nonpayment Cancellations)	1,635	114	1	0.88%
11	50 Ill. Adm. Code 919.50(a)	The Company failed to offer payment within 30 days after affirming liability. (PPA First Party Paid Claims)	311	82	1	1.22%
12	50 Ill. Adm. Code 919.80(b)(2)	The Company failed to provide a written explanation for the delay in settling the claim. (PPA First Party Paid Claims)	311	82	2	2.44%
13	50 Ill. Adm. Code 919.80(b)(3)	The Company failed to provide a written explanation to the third party for the delay in settling the claim after 60 days. (PPA Third Party Paid Claims)	823	105	2	1.90%

Table of Total Violations

Crit No.	Statute/Rule	Description of Violations	Population	Files Reviewed	No. of Violations	Error %
15	50 Ill. Adm. Code 919.80(b)(2)	The Company failed either to provide a delay letter in claims unresolved for more than 40 days or failed to include the explanation for the delay and the Notice of Availability in the letter sent to the insured. (PPA Total Loss Claims)	110	76	14	18.42%
17	50 Ill. Adm. Code 919.80(c)(3)(A)(i)	The Company failed to make the correct payments of transfer and title fees when the insured substantiated replacement of the vehicle. This resulted in overpayments of \$304.00 and underpayments of \$25.00. (PPA Total Loss Claims)	110	76	5	6.58%
18	50 Ill. Adm. Code 919.30(c)	The Company failed to provide detailed documentation in relation to owner retained salvage calculations in claim files. (PPA Total Loss Claims)	110	76	9	11.84%
19	50 Ill. Adm. Code 919.50(a) and 215 ILCS 5/143b	The Company failed to return the insured's deductible within 30 days of receiving subrogation settlement. (PPA Subrogation Claims)	24	24	5	20.83%
21	215 ILCS 5/143.25a	The Company provided no evidence that it informed insureds, prior to the first renewal, of a premium savings if a higher deductible for comprehensive and collision coverage was purchased. (Interrelated Findings/PPA Renewals)	N/A	N/A	N/A	N/A

II. BACKGROUND

Loya Insurance Company – NAIC #11198

Loya Insurance Company (LIC) was formed in 2001, as a reinsurance company domiciled in the state of Texas for the purpose of assuming reinsurance for personal automobile liability and physical damage coverage policies produced by affiliated agencies. During 2006, the Company began operations as a direct writer of automobile policies in Texas produced by affiliated agencies.

LIC was issued a Certificate of Authority to transact certain property and casualty business in Illinois on December 26, 2006. The Company produced premiums of approximately \$10.4 million for the year ended December 31, 2015, of which approximately 74% is for private passenger automobile liability and 26% is for private passenger automobile physical damage.

The Company's 2015 NAIC Annual Statement, Page 19 (Illinois), reflects the following information:

	Line	Direct Premiums Written	Direct Premiums Earned	Direct Losses Paid	Direct Losses Incurred
19.2	Other Private Passenger Automobile Liability	\$7,716,169	\$7,695,683	\$3,816,115	\$3,981,667
21.1	Private Passenger Automobile Physical Damage	\$2,727,993	\$2,692,059	\$1,516,964	\$1,519,152
	Totals for Lines 19.2 & 21.1	\$10,444,162	\$10,387,742	\$5,333,079	\$5,500,819
35	Totals All Lines	\$10,444,162	\$10,387,742	\$5,333,079	\$5,500,819

III. METHODOLOGY

The market conduct examination process places emphasis on an insurer's systems and procedures used in dealing with insureds and claimants. The private passenger automobile line of business was reviewed in this examination.

The scope of this examination was a comprehensive examination including a review of the following areas:

- A. Company Operations and Management
- B. Complaints
- C. Producer Licensing
- D. Risk Selection
- E. Underwriting
- F. Claims

The review of these categories was accomplished through examination of material related to the Company's operations and management, complaint files, producer lists, underwriting files, risk selection files and claim files, as well as interviews with various Company personnel and Company responses to the Coordinator's Handbook, Interrogatories and Criticisms. Each of the categories listed above was examined for compliance with Illinois statutes and the Illinois Administrative Code.

The following method was used to obtain the required samples and to ensure a statistically sound selection. Surveys were developed from Company-generated Excel spreadsheets. Random statistical file selections were generated by the examiners from these spreadsheets. In the event the number of files was too low for a random sample, the sample consisted of the universe of files.

Company Operations and Management

A review was conducted of the Company's underwriting and claims guidelines and procedures, policy forms, third party vendors, internal audits, certificate of authority, previous market conduct examinations and annual statements. These documents were reviewed for compliance with Illinois statutes and the Illinois Administrative Code. There were no exceptions noted.

Complaints

The Company was requested to identify all consumer and Illinois Department of Insurance (DOI) complaints received during the examination period, plus five (5) months prior for trending purposes, and to provide copies of the complaint logs. All complaint files and logs were received. The files were reviewed for compliance with Illinois statutes and the Illinois Administrative Code.

Producer Licensing

The Company was requested to provide a list of all producers licensed to do business in Illinois and a list of those producers paid commission in Illinois during the examination period. The Company identified a universe of producers. The universe of producers was reviewed in comparison to the Illinois licensing database and for compliance with Illinois statutes and the Illinois Administrative Code. Newly issued business was also reviewed to determine if solicitations were made by duly licensed persons.

Risk Selection

The Company was requested to provide a list of all policies in the following categories during the examination period: company initiated cancellations, cancellations for nonpayment of premium, insured requested cancellations, rescissions and nonrenewals. The Company identified the universes of policies. Random samples of the files were made by the examiners and submitted to the Company. The files were received and reviewed unless the small population of files required an examination of the entire universe. Also, due to disqualifying factors, some individual files in the initial samples were replaced. The files were reviewed to ensure that the policies were processed in compliance with Illinois statutes and the Illinois Administrative Code. The review determined compliance with statutory requirements, the accuracy and validity of reasons given and examined for any possible unfair discrimination.

Underwriting

The Company was requested to provide a list of all new private passenger automobile policies. The Company identified the universe of policies; random samples of the files were made by the examiners and submitted to the Company. The files were received and reviewed. The files were reviewed to ensure that the policies were processed in compliance with Illinois statutes and the Illinois Administrative Code. The review included the premium rating of the sample policies. New policies were also reviewed to determine the correct 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.

Claims

The Company was requested to provide a list of all claims in various categories during the examination period, to include paid and closed without payment. Due to various disqualifying factors, some individual files in the samples were replaced with another file. The files were reviewed to ensure the claims were processed in compliance with the policy, Illinois statutes and the Illinois Administrative Code.

IV. SELECTION OF SAMPLES

Survey	Population	# Reviewed	% Reviewed
Complaints			
Complaints – DOI	25	25	100%
Complaints – Consumer	17	17	100%
Producer Licensing			
Commissions	209	209	100%
Risk Selection			
Private Passenger Automobile Cancellations	254	84	33.07%
Private Passenger Automobile Insured Requested Cancellations	2,061	115	5.58%
Private Passenger Automobile Nonpayment Cancellations	1,635	114	6.97%
Private Passenger Automobile Nonrenewals	9	9	100%
Underwriting			
Private Passenger Automobile New Business	11,427	116	1.02%
Claims			
Private Passenger Automobile First Party Median & Paid	311	82	26.37%
Private Passenger Automobile First Party Closed Without Payment	339	82	24.19%
Private Passenger Automobile Third Party Median & Paid	823	105	12.76%
Private Passenger Automobile Third Party Closed Without Payment	1,663	107	6.43%
Private Passenger Automobile Total Loss	110	76	69.09%
Private Passenger Automobile Subrogation	24	24	100%

V. FINDINGS

A. COMPLAINTS

1. Complaints – DOI

Of the 26 Department complaint files provided, one (1) file was disqualified for not being an Illinois complaint, leaving 25 files for the review. In one (1) instance of the 25 Department Complaint files reviewed, for an error rate of 4.00%, the Company failed to address all concerns in its response to the Department. The Company did not address the insured's concern of the supplemental cost for vehicle collision repairs. This is in violation of 50 Ill. Adm. Code 926.40(b)(1).

Item No.	Date Company Received DOI Complaint	Criticism Comment
14	12/10/2015	The Company did not address the insured's concern about the amount of the supplemental estimate in its first response. Consumer stated the supplemental estimate amount was \$933.79 and that he received a check for only \$281.61 which was the original estimate of \$781.61 minus the deductible of \$500.00. The Company addressed the original estimate of \$781.61 and not the insured's concern of the \$933.79 supplemental estimate.

2. Complaints – Consumer

In 11 instances of the 17 consumer complaint files reviewed, for an error rate of 64.71%, the Company failed to include the identification number, function code, line type, Insurance Department Complaint and State of Origin on its telephone complaint register, as outlined in Exhibit A and as defined in Exhibit B of the regulation. This is in violation of 50 Ill. Adm. Code 926.50.

B. PRODUCER LICENSING

There were no criticisms in the Producer Licensing Commissions survey.

C. RISK SELECTION

1. Private Passenger Automobile Cancellations

In 72 instances of the 84 Private Passenger Automobile Cancellations files reviewed, for an error rate of 85.71%, the Company failed to refund the unearned premium within

30 days from the date of the notice of cancellation by the Company. This is in violation of 215 ILCS 5/143.12a(b)(1).

2. Private Passenger Automobile Insured Requested Cancellations

There were no criticisms in the Private Passenger Automobile Insured Requested Cancellations survey.

3. Private Passenger Automobile Nonpayment Cancellations

In one (1) instance of the 114 Private Passenger Automobile Nonpayment Cancellations files reviewed, for an error rate of 0.88%, the Company failed to mail a notice of cancellation at least 10 days prior to canceling the policy for nonpayment of premium. This is in violation of 215 ILCS 5/143.15.

4. Private Passenger Automobile Nonrenewals

There were no criticisms in the Private Passenger Automobile Nonrenewals survey.

D. UNDERWRITING

There were no criticisms in the Underwriting surveys.

E. CLAIMS

1. Private Passenger Automobile First Party Claims Paid (Collision) & Median

There were no criticisms for the median of Private Passenger Automobile First Party Paid Claims.

In one (1) instance of the 82 Private Passenger Automobile First Party Paid Claim files reviewed, for an error rate of 1.22%, the Company failed to offer payment within 30 days after affirming liability. This is in violation of 50 Ill. Adm. Code 919.50(a).

In two (2) instances of the 82 Private Passenger Automobile First Party Paid Claims files reviewed, for an error rate of 2.44%, the Company failed to provide the insured a written explanation for the delay in settling the claim. This is in violation of 50 Ill. Adm. Code 919.80(b)(2).

2. Private Passenger Automobile First Party Claims Closed Without Payment (Collision)

There were no criticisms for the Private Passenger Automobile First Party Closed Without Payment Claims survey.

3. Private Passenger Automobile Third Party Claims Paid (Property Damage) & Median

There were no criticisms for the median of Private Passenger Automobile Third Party Claims Paid Claims.

In two (2) instances of the 105 Private Passenger Automobile Third Party Paid Claim files reviewed, for an error rate of 1.90%, the Company failed to provide a written explanation to the third party for the delay in settling the claim after 60 days. This is in violation of 50 Ill. Adm. Code 919.80(b)(3).

4. Private Passenger Automobile Third Party Claims Closed Without Payment (Property Damage)

There were no criticisms for the Private Passenger Automobile Third Party Closed Without Payment Claims survey.

5. Private Passenger Automobile Total Loss Claims (First Party)

In 14 instances of the 76 Private Passenger Automobile Total Loss Claims files reviewed, for an error rate of 18.42%, the Company failed to either provide a delay letter for claims unresolved for more than 40 days or sent a letter that did not include an explanation of the delay and the Notice of Availability of the Department of Insurance. This is a violation of 50 Ill. Adm. Code 919.80(b)(2).

Item No.	Report Date	Final Payment Date	No. Days	Criticism Comment
5	08/26/2015	12/08/2015	104	No delay letter
6	10/23/2015	02/09/2016	109	No delay letter
13	01/25/2016	03/28/2016	63	No explanation for delay or Notice of Availability in letter.
14	02/23/2016	05/12/2016	79	No explanation for delay or Notice of Availability in letter.
15	01/04/2016	03/14/2016	70	No explanation for delay or Notice of Availability in letter.
18	04/11/2016	06/09/2016	59	No explanation for delay or Notice of Availability in letter.
21	08/28/2015	12/04/2015	98	No delay letter
23	01/04/2016	02/19/2016	46	No delay letter
29	11/27/2015	03/01/2016	95	No explanation for delay or Notice of Availability in letter.
33	09/22/2015	12/15/2015	84	No delay letter
37	07/06/2015	12/10/2015	157	No delay letter
48	11/11/2015	02/17/2016	98	No delay letter
51	01/04/2016	04/08/2016	95	No delay letter
63	11/11/2015	03/26/2016	136	No delay letter

In five (5) instances of the 76 Private Passenger Automobile Total Loss Claims files reviewed, for an error rate of 6.58%, the Company failed to make the correct payments of transfer and title fees when the insured substantiated replacement of the vehicle. This resulted in overpayments of \$304.00 and underpayments of \$25.00. The Company refunded the underpayment of \$25.00 to the insured. This is in violation of 50 Ill. Adm. Code 919.80(c)(3)(A)(i).

Item No.	Date of Loss	Payment of Transfer/Title Fees and Sales Tax	Criticism Comment
24	11/08/2015	Paid \$196.00 for title/transfer fees.	Failed to pay correct title/transfer fee of \$120.00. Overpaid \$76.00.
29	11/26/2015	Paid \$95.00 for title fee.	Failed to pay correct title/transfer fee of \$120.00. Did not pay \$25.00 for transfer fee. Underpaid \$25.00.
34	12/28/2015	Paid \$196.00 for title/transfer fees.	Failed to pay correct title/transfer fee of \$120.00. Overpaid \$76.00.
44	06/08/2016	Paid \$196.00 for title/transfer fees.	Failed to pay correct title/transfer fee of \$120.00. Overpaid \$76.00.
67	07/23/2015	Paid \$196.00 for title/transfer fees.	Failed to pay correct title/transfer fee of \$120.00. Overpaid \$76.00.

In nine (9) instances of the 76 Private Passenger Automobile Total Loss Claims files reviewed, for an error rate of 11.84%, detailed documentation was missing in the claim file preventing reconstruction of the Company's activities, specifically for activities in relation to owner retained salvage calculations. This is in violation of 50 Ill. Adm. Code 919.30(c).

Item No.	Date of Loss	Amount Paid	Criticism Comment
1	08/05/2015	\$2,814.85	Co. valued salvage at 36% of ACV (\$1,833.13)
2	07/31/2015	\$1,338.60	Co. valued salvage at 30% of ACV (\$809.40)
4	10/14/2015	\$1,140.80	Co. valued salvage at 30% of ACV (\$703.20)
6	10/23/2015	\$1,621.00	Co. valued salvage at 30% of ACV (\$909.00)
20	03/04/2016	\$3,743.40	Co. valued salvage at 30% of ACV (\$1,818.60)
35	01/22/2016	\$1,415.68	Co. valued salvage at 30% of ACV (\$821.00)
45	11/21/2015	\$1,834.00	Co. valued salvage at 30% of ACV (\$1,000.50)
58	07/08/2015	\$3,805.00	Co. valued salvage at 30% of ACV (\$1,845.00)
68	12/01/2015	\$2,474.79	Co. valued salvage at 30% of ACV (\$1,274.91)

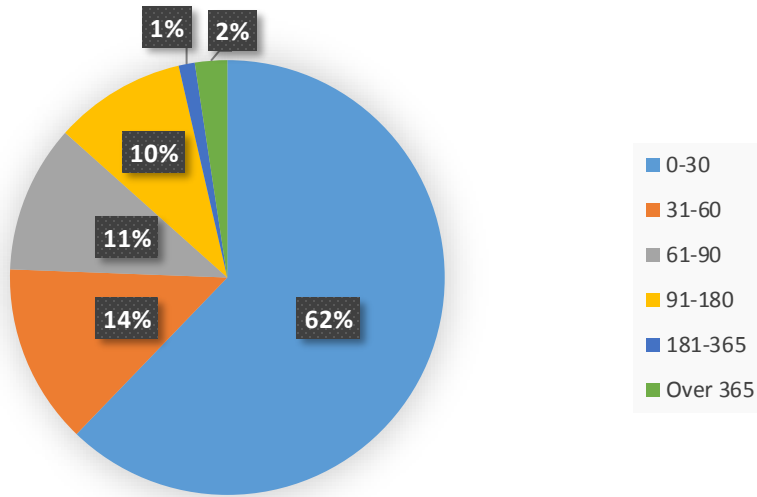
6. Private Passenger Automobile Subrogation Claims (First Party)

In five (5) instances of the 24 Private Passenger Automobile Subrogation Claims files reviewed, for an error rate of 20.83%, the Company failed to return the insured's deductible within 30 days of receiving a subrogation settlement. This is in violation of 50 Ill. Adm. Code 919.50(a) and 215 ILCS 5/143b.

VI. TECHNICAL APPENDICES

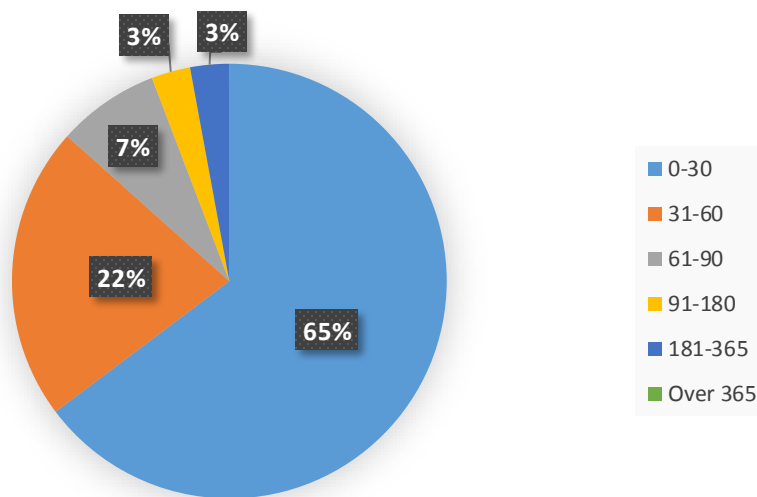
MEDIAN DISTRIBUTION – 19 Days:
PRIVATE PASSENGER AUTOMOBILE FIRST PARTY PAID

Number of Days	Number of Files	Percent
0-30	51	62.2%
31-60	11	13.4%
61-90	9	11.0%
91-180	8	9.8%
181-365	1	1.2%
Over 365	2	2.4%
Total	82	100%



**MEDIAN DISTRIBUTION – 22 Days:
PRIVATE PASSENGER AUTOMOBILE THIRD PARTY PAID CLAIMS**

Number of Days	Number of Files	Percent
0-30	68	64.8%
31-60	23	21.9%
61-90	8	7.6%
91-180	3	2.9%
181-365	3	2.9%
Over 365	0	0%
Total	105	100%



VII. INTERRELATED FINDINGS

1. During the review of the Private Passenger Automobile Subrogation Claims files, the examiners found that the Company sent a letter to reconfirm the insured’s address before releasing the deductible. The Department cautions the Company that sending this letter causes additional delays and the reverification of the address could have been resolved in a more timely manner with a telephone call.
2. From the response to Interrogatory #1, regarding the first renewal of an automobile policy, the Company is in violation of 215 ILCS 5/143.25a. The Company provided no evidence that it informed insureds prior to the first renewal of a possible premium savings if the higher deductibles for comprehensive and collision coverage were purchased.

STATE OF ILLINOIS
DEPARTMENT OF INSURANCE



IN THE MATTER OF:

LOYA INSURANCE COMPANY
1800 LEE TRAVINO DRIVE, SUITE 201
EL PASO, TX 79936-4117

STIPULATION AND CONSENT ORDER

WHEREAS, the 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, Loya Insurance Company, (“the Company”), NAIC 11198, is authorized under the insurance laws of this State and by the Director to engage in the business of soliciting, selling and issuing insurance policies; and

WHEREAS, a Market Conduct Examination of the Company was conducted by a duly qualified examiner of the Department pursuant to Sections 132, 401, 402, 403, and 425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402, 5/403, 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 Company was not in compliance with the Illinois Insurance Code (215 ILCS 5/1 *et seq.*) and Department Regulations (50 Ill. Adm. Code 101 *et seq.*); and

WHEREAS, nothing herein contained, nor any action taken by the Company 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 Company; and

WHEREAS, the Company is aware of and understands 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 Company understands and agrees that by entering into this Stipulation and Consent Order, they waive any and all rights to notice and hearing; and

WHEREAS, the Company and the 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 Company and the Director as follows:

1. The Market Conduct Examination indicated various areas in which the Company was not in compliance with provisions of the Illinois Insurance Code and Department Regulations; and
2. The Director and the Company consent to this Order requiring the Company 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 Director that the Company shall:

1. Institute and maintain policies and procedures whereby the Company shall maintain a complaint record with the required minimum information for complaints received from the Department, as well as those received directly from the consumer, as required by 50 Ill. Adm. Code 926.50.
2. Institute and maintain policies and procedures whereby the Company shall maintain detailed documentation in a claim file in order to permit reconstruction of the Company's activities relative to the claim as required by 50 Ill. Adm. Code 919.30(c).
3. Institute and maintain policies and procedures whereby the Company shall provide the insured with a reasonable written explanation for the delay when a claim remains unresolved for more than 40 days as required by 50 Ill. Adm. Code 919.80(b)(2).
4. Institute and maintain policies and procedures whereby the Company shall refund unearned premium within 30 days from the date of the notice of cancellation by the Company as required by 215 ILCS 5/143.12a(b)(1).
5. Institute and maintain policies and procedures whereby the Company shall affirm or deny liability on claims within a reasonable time and shall offer payment within 30 days after affirmation of liability, if the amount of the claim is determined and not in dispute and shall timely reimburse the pro rata amount of the insured's deductible after recovery from the adverse party as required by 50 Ill. Adm. Code 919.50(a) and 215 ILCS 5/143b.
6. Submit to the 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 Director of Insurance, State of Illinois, a civil forfeiture in the amount of \$11,500.00 to be paid within 30 days of execution of this Order.

NOTHING contained herein shall prohibit the 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 Company 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 LOYA INSURANCE COMPANY

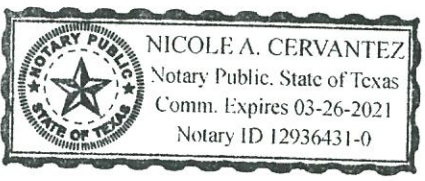
Flor Lopez
Signature

Flor Lopez
Name

President
Title

Subscribed and sworn to before me this
14th day of *December* 2017.

Nicole A. Cervantez
Notary Public



DEPARTMENT OF INSURANCE of the
State of Illinois:

DATE *12/19/17*

Jennifer Hammer
Jennifer Hammer
Director

