

**BEFORE THE COMMISSIONER OF SECURITIES AND INSURANCE,
OFFICE OF THE MONTANA STATE AUDITOR**

IN THE MATTER OF VICTORY
INSURANCE COMPANY'S
MISREPRESENTATION OF POLICY
TERMS, ILLEGAL MIDTERM
CANCELLATION, AND FAILURE TO
PROVIDE NOTICE OF NON-
RENEWAL TO VICTORY'S
CUSTOMERS

VICTORY INSURANCE COMPANY,
INC. – NAIC Company Code 12900

Respondent.

Case No. INS-2022-00157

**ORDER DELEGATING AUTHORITY
FOR RENDERING FINAL DECISION**

The Hearing Examiner in this Matter having granted the Commissioner's motion for Summary Judgment on May 23, 2023;

In the Recommended Agency Action, the Hearing Examiner found the Commissioner has the power to impose a fine not to exceed \$25,000 per violation, that Victory had committed 165 separate violations, entitling the Commissioner to impose a fine upon Victory not to exceed the amount of \$4,125,000;

Pursuant to Mont. Code Ann. § 2-4-621, before the agency may render a final decision in this matter, the proposal for decision must be served upon the parties and each party adversely affected may file exceptions and present briefs and oral argument to the officials who are to render the decision;

The parties were served with the proposal for decision in this matter on May 23, 2023 when the Hearing Examiner emailed the Hearing Examiner's Findings of Fact, Conclusions of Law, Order, and Recommended Decision on the Commissioner's Motion for Summary Judgment to the parties.

Pursuant to Mont. Code Ann. § 33-1-304 the Commissioner hereby delegates his authority to render a final decision in this matter to the Deputy State Auditor Mary Belcher.

DATED this 1 day of June 2023.



TROY DOWNING

*Commissioner of Securities and Insurance
Office of the Montana State Auditor*