



**Oregon**

Kate Brown, Governor



Division of  
Financial  
Regulation

Department of Consumer  
and Business Services

December 30, 2022

Sent Via Certified Mail and electronic means to: [fchlanda@unitedheritage.com](mailto:fchlanda@unitedheritage.com)

Certified Mail No: 7022 0410 0001 5700 3804

Sublimity Insurance Company

Attn: Fritz Chlanda

100 SW Sublimity Blvd.

Sublimity, OR 97385

Re: Targeted Market Conduct Examination Report  
Sublimity Insurance Company, NAIC CoCode 26824

Dear Mr. Chlanda,

Please find Sublimity Insurance Company's (Sublimity) market conduct examination report for your review. The Division's examination team and the insurer examination staff attended a closing conference on December 8, 2022 to discuss the finalization of the report and address any concerns Sublimity might have around the examination.

In this conference, Sublimity indicated to be in agreement with the report as written.

### **Insurer report response**

Generally, we expect the insurer will respond in writing to the findings and recommendations in the draft within 30 calendar days. During this period the report will not be published, however, the division reserves the right to issue the report to the public without an insurer response if the insurer does not respond within the time allotted. In such cases, we will indicate that we provided the insurer with the opportunity to respond, but the insurer declined to do so or did not do so within the required timeframe.

The response, signed by the responsible company official should be provided as a scanned pdf. The insurer should include in its response the corrective actions it has taken or plans to take in response to the examination and examination report and an estimated timeframe for their implementation. The insurer's response will be included with the final report. The division reserves the right to respond to an insurer's response if the contents of the response are not factual or if, in the judgment of the director, the response requires clarification. We will notify the Insurers that disagree with findings, conclusions, and recommendations in the report the insurer of the disagreement before the release of the report and will allow the insurer to amend its written report response.

Insurers can request a hearing with Director Stolfi under ORS 731.312(3). Insurers that would like to request a hearing with the Director can email [dfc.pcmarketconduct@dcbs.oregon.gov](mailto:dfc.pcmarketconduct@dcbs.oregon.gov). Hearing requests must be received *before* the expiration of the 30 day report consideration period. The hearing with the Director is not a contested case hearing.

### **Safeguarding draft reports and documentation**

The draft examination reports are subject to further review and revision and are not to be considered final. Early disclosure could result in the dissemination of erroneous information or recommendations. The insurer should limit and control the distribution of draft reports. In addition, except for the final draft, draft reports and exam documentation are not subject to public records requests.

### **The public report**

The written public report is generally the best vehicle for communicating the results of each exam. The division will provide the insurer with the expected date for releasing the final exam report and publishing it to the division's website.

### **Legislative testimony**

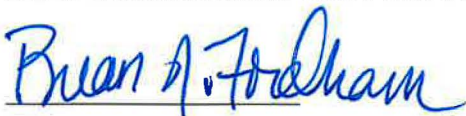
Legislative committees may request that the division prepare testimony and appear at hearings. When the division testifies about a publicly released report or management letter, the testimony will be fact-based and the conclusions and recommendations will mirror those in the written report.

### **Recommendation follow-up**

The division's recommendations are intended to improve the economy, efficiency, and effectiveness of an insurer's operations and to improve the accountability of insurers providing benefits to Oregonians. We will monitor and may report on an insurer's progress in implementing recommendations. The division will follow up on recommendations as part of recurring examination work or as an activity separate from any other examination activity. When following up on recommendations, we ask the insurer to provide evidence of implementation. Division staff will then assess the evidence and make an independent judgment call as to the status of recommendation implementation.

### **Press policy**

The Division may issue a press release highlighting results of insurer examination reports. We are still discussing the timing of any press release on the individual report. Press questions will be handled with the DCBS Communications Office with assistance from examination staff.



Brian J. Fordham, MCM  
Property and Casualty & Business Analytics Program Manager  
Division of Financial Regulation  
Oregon Dept. of Consumer & Business Services  
Ph. 503-947-7205