



COMMONWEALTH OF MASSACHUSETTS
Office of Consumer Affairs and Business Regulation
DIVISION OF INSURANCE

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DANIEL R. JUDSON
COMMISSIONER OF INSURANCE

April 30, 2015

Susan M. Allen
103A Hillside Road
Southwick, MA 01077

Re: SIU No. 8855
Susan M. Allen

Dear Ms. Allen:

I represent the Massachusetts Division of Insurance (“Division”) with reference to the above referenced matter. I am in receipt of your letters dated January 6 and January 14, 2014 to Investigator Sandra Pearson of the Division. Kindly direct all future correspondence to my attention.

The Division has reviewed various documents with regard to your interactions with certain policy owners and an insurance producer from Symetra Life Insurance Company (“Symetra”). As you are aware, Symetra terminated your appointment with the company in October 2013 based on their finding that you placed multiple telephone calls on various dates in 2012 and 2013 to Symetra whereby you impersonated various owners of Symetra annuity contracts and a Symetra appointed agent.

Based upon the Division’s investigation, it appears that you have violated the following Massachusetts insurance laws:

M.G.L. c. 175, § 162R(a)

(7) having admitted or been found to have committed any insurance unfair trade practice or fraud.

(8) using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in the commonwealth or elsewhere.

The penalty for each and every violation of M.G.L. c. 175, § 162R(a) is a fine of not more than \$1,000 pursuant to M.G. L. c.176D, § 7 and having the insurance producer license placed on probation, suspended or revoked.

M.G.L. c. 176D, § 2 – prohibits unfair methods of competition and unfair or deceptive acts or practices in the business of insurance in Massachusetts. The penalty for each violation is a fine of not more than \$ 1,000.

The Division is authorized to issue an order requiring you to show cause why you should not be made to cease and desist from the above-alleged conduct. If, after a public hearing, the Commissioner finds that you did commit the alleged violations, you may be liable for fines up to the amounts listed above and subject to having your Massachusetts insurance producer license placed on probation, suspended or revoked.

The Division proposes to resolve this matter through a settlement if you agree to cease and desist from the above alleged-conduct, agree to waive your right to a hearing, and agree to pay a fine of \$ 3,000.00

If you choose to accept the Division's offer please sign this settlement letter where provided below and return it to my attention, together with a check made payable to the Commonwealth of Massachusetts, no later than May 22, 2015. This will be a reportable administrative action.

Although this correspondence does not constitute the required statutory notice of a public hearing, if this matter is not resolved by May 22, 2015, the Division intends to file an Order to Show Cause and will notify you of the hearing date.

Thank you for your attention to this matter. Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me at (617) 521-7389.

Sincerely,

Robert J. Kelly
Counsel to the Commissioner

SIGNED: _____
Susan M. Allen

DATE: _____