



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

1000 Washington Street • Suite 810 • Boston, MA 02118-6200
(617) 521-7794 • FAX (617) 521-7475 • Toll-free (877) 563-4467
<http://www.mass.gov/doi>

DEVAL L. PATRICK
GOVERNOR

GREGORY BIALECKI
SECRETARY OF HOUSING AND
ECONOMIC DEVELOPMENT

BARBARA ANTHONY
UNDERSECRETARY OF CONSUMER AFFAIRS
AND BUSINESS REGULATION

JOSEPH G. MURPHY
COMMISSIONER OF INSURANCE

Division of Insurance, Petitioner
v.
Earl O. O'Garro and Hybrid Insurance Agency, LLC, Respondents
Docket No. E2014-09

Order and Decision on Petitioner's Motion for Summary Decision

Introduction and Procedural History

On August 8, 2014, the Division of Insurance ("Division"), filed an Order to Show Cause ("OTSC") against Earl O. O'Garro ("O'Garro") and Hybrid Insurance Agency, LLC ("Hybrid") (collectively, "the Respondents"). The Division asserted several causes for discipline against the Respondents under Massachusetts General Laws Chapter 175 and Chapter 176D.

The Division asserts the following causes for discipline against O'Garro pursuant to Chapter 175 and Chapter 176D. It alleges that O'Garro violated the insurance laws, regulations, subpoenas or orders of six other state insurance commissioners, in "violation" of § 162R(a)(2) of Chapter 175 ("§ 162R(a)(2)").¹ It avers that O'Garro improperly withheld, misappropriated, or converted premium monies that he received in the course of doing insurance business, in "violation" of § 162R(a)(4) of Chapter 175 ("§ 162R(a)(4)"). The OTSC alleges that O'Garro

¹ The substance of the Division's allegation is that these actions by O'Garro constitute a cause for disciplining him pursuant to § 162R(a)(2). *See Division of Insurance v. Lester Williams*, Docket No. E2012-10 (The Presiding Officer observed that it was imprecise for the Order to Show Cause to allege that Williams "violated" § 162R(a)(2) because this provision is the second of 14 "causes" that are listed in Chapter 175, § 162R(a), as possible grounds for disciplining licensees.).

The Division uses the language of "violation" for most of the charges that it makes in the OTSC. In most cases the substance of the Division's allegation is that the complained of action by O'Garro or Hybrid constitutes a cause for disciplining the licensee pursuant to the subsection of § 162R(a) that is specified by the Division.

“violated” § 162R(a)(7) of Chapter 175 (“§ 162R(a)(7)”) by engaging in unfair trade practices or fraud in Connecticut and “violated” § 162R(a)(8) of Chapter 175 (“§ 162R(a)(8)”) by using fraudulent, coercive, or dishonest practices and demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in Connecticut; and thereby committed unfair or deceptive acts or practices in the business of insurance, in violation of § 2 of Chapter 176D. The OTSC charges that O’Garro “violated” § 162R(a)(9) of Chapter 175 (“§ 162R(a)(9)”) by having insurance licenses revoked or suspended by six states (Connecticut, Kentucky, Maine, Georgia, Ohio, and Rhode Island). It additionally claims that O’Garro failed to report to the Division these six administrative actions taken by these jurisdictions; constituting six violations of the reporting requirement in § 162V(a) of Chapter 175 (“§ 162V(a)”). Finally, the Division asserts that O’Garro is in “violation” of § 162N of Chapter 175 (“§ 162N”) because O’Garro’s resident insurance producer license was revoked by his home state of Connecticut.²

With respect to the claims against Hybrid, the Division asserts the following causes for discipline pursuant to Chapter 175 and Chapter 176D. It alleges that Hybrid violated the insurance laws of two other state insurance commissioners, in violation of § 162R(a)(2). It avers that Hybrid improperly withheld, misappropriated, or converted premium monies that it received in the course of doing insurance business, in “violation” of § 162R(a)(4). It alleges that Hybrid “violated” § 162R(a)(7) by engaging in unfair trade practices or fraud; “violated” § 162R(a)(8) by using fraudulent, coercive, or dishonest practices and demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in Connecticut; and thereby committed unfair or deceptive acts or practices in the business of insurance, in violation of Chapter 176D, § 2. The OTSC further charges that Hybrid “violated” § 162R(a)(9) by having its insurance licenses revoked by two other states (Connecticut and Georgia). Finally, it alleges

² The substance of the Division’s claim is that, pursuant to § 162N, O’Garro is not eligible for a Massachusetts non-resident insurance license because his home state of Connecticut has revoked O’Garro’s resident insurance producer license. See *Division of Insurance v. Lester Williams*, Docket No. E2012-10 (The Presiding Officer stated that it was imprecise to speak of Williams’ ineligibility under § 162N(a) for a Massachusetts non-resident insurance producer license as constituting a “violation” of § 162N(a); rather Williams was ineligible for a Massachusetts non-resident insurance license because North Carolina had suspended his North Carolina resident insurance license).

that Hybrid failed to report to the Division these two administrative actions taken by these jurisdictions; constituting two violations of the reporting requirement in § 162V(a).³

The Commissioner of Insurance (“Commissioner”) designated me to be Presiding Officer for the proceeding on the OTSC.

On August 8, 2014, Robert J. Kelly, Esq., counsel for the Division, mailed the OTSC, with a Notice of Action from the Hearings and Appeals Docket Clerk (“Docket Clerk”), to the Respondents at their current addresses appearing on the records of the Commissioner. Neither of the Respondents filed an Answer to the OTSC.

The Division on September 3, 2014, filed Petitioner’s Motion for Summary Decision in this matter (“Motion”) and mailed the Motion to the Respondents at their current addresses appearing on the records of the Commissioner.

On September 4, 2014, I issued an Order and Notice of Hearing (“Order”), which the Docket Clerk sent postpaid by certified mail, return receipt requested, and by regular U. S. mail, postage prepaid, to the Respondents at their current addresses appearing on the records of the Commissioner. The Respondents were notified that the Motion would come on for Hearing on October 7, 2014, and that the Hearing would be conducted in accordance with Massachusetts General Laws Chapter 30A and the Formal Rules of the Standard Adjudicatory Rules of Practice and Procedure, 801 Code of Massachusetts Regulations 1.01, *et seq.*

In the Order, the Respondents were ordered to file any written responses to the Motion no later than October 3, 2014. The Respondents further were advised that failure of a Respondent to respond to the Motion or to appear at the Hearing could result in the entry of an order of default against that Respondent and the entry of a summary decision or decision on the pleadings granting the relief requested in the OTSC that was filed by the Petitioner on August 8, 2014.

The envelope containing the copy of the Order that was sent to O’Garro’s Hartford business address by certified mail was returned to the Docket Clerk on September 15, 2014. The

³ The Division in ¶ 15 of the STATEMENT OF FACTS section of the OTSC alleges that Hybrid failed to report the administrative actions taken against it and in ¶¶14 and 34 of the RELIEF section asks for sanctions against Hybrid for violation of the reporting requirement in § 162V(a). I find that the OTSC gave sufficient notice of this claim against Hybrid despite its absence in the formal CLAIM paragraphs of the OTSC. *Cf.* TENTH CLAIM stated against O’Garro.

envelope had the following label pasted to it: "RETURN TO SENDER – NOT DELIVERABLE AS ADDRESSED – UNABLE TO FORWARD." The envelope containing the copy of the Order that was sent to O'Garro's Hartford business address by regular U. S. mail, postage prepaid, also was returned to the Docket Clerk on September 15, 2014. This envelope also had a label pasted on it, stating: "RETURN TO SENDER – NOT DELIVERABLE AS ADDRESSED – UNABLE TO FORWARD."

The envelope containing the copy of the Order that was sent to O'Garro's Marlborough home and mailing address by certified mail was returned to the Docket Clerk on October 8, 2014. A stamp on the front of the envelope documented that second notice of the certified mail containing a copy of the Order had been given to O'Garro on September 20, 2014. The envelope had the following label pasted to it: "RETURN TO SENDER – UNCLAIMED – UNABLE TO FORWARD."

The envelope containing the copy of the Order that was sent to Hybrid by certified mail was returned to the Docket Clerk on September 15, 2014. The envelope had the following label pasted on it: "RETURN TO SENDER – NOT DELIVERABLE AS ADDRESSED – UNABLE TO FORWARD." The envelope containing the copy of the Order that was sent to Hybrid by regular U. S. mail, postage prepaid, also was returned to the Docket Clerk on September 15, 2014. This envelope also had a label pasted on it, stating: "RETURN TO SENDER – NOT DELIVERABLE AS ADDRESSED – UNABLE TO FORWARD."

Neither of the Respondents filed a response to the Motion and neither attended the hearing that was held on October 7, 2014.

Finding of Default

The Division took appropriate actions to ensure proper service, and sufficient service was made. Section 162M(f) of Chapter 175 requires Massachusetts insurance producers and agencies to inform the Commissioner of a change of address within 30 days of the change. The OTSC and Notice of Action were sent by mail to the Respondents at their current addresses then-appearing on the records of the Commissioner. *See* 801 CMR 1.01(4)(c) ("Notice of actions and

*Order and Decision on Petitioner's Motion for Summary Decision
Division of Insurance v. Earl O. O'Garro and Hybrid Insurance Agency, LLC, Respondents;
Docket No. E2014-09*

other communications from the adjudicating Agency, or its designee, shall be presumed to be received upon the day of hand-delivery or, if mailed, three days after deposit in the U.S. mail.”).

The Order was sent postpaid by regular U. S. mail and by certified mail to the Respondents at their current addresses then-appearing on the records of the Commissioner. This was sufficient notice of the hearing on the Motion. *See* Chapter 175, § 174A; Massachusetts General Laws Chapter 4, § 7.

The failure of each Respondent to answer the OTSC or to respond to the Division's Motion, and the failure of each Respondent to appear at the hearing on the Motion, warrant finding that each Respondent is in default. By this default, each Respondent has waived the right to proceed further with an evidentiary hearing and I may consider the Motion on the merits of the matter based solely upon the OTSC and the exhibits attached to it. *See Division of Insurance v. John Clark Daly*, Docket No. E93-2 (The Presiding Officer may accept the allegations contained in the Order to Show Cause as true if there is no Answer to the Order to Show Cause.). No genuine issue of fact has been raised in connection with the Division's claims, and I find that it is entitled to prevail as a matter of law.

Findings of Fact

On the basis of the record, consisting of the OTSC and the exhibits attached to it, I find the following facts:

1. O'Garro first was licensed by the Division as a non-resident individual insurance producer on April 20, 2010, and his license remains active.
2. At all times pertinent to this proceeding the following addresses have appeared on the records of the Commissioner as O'Garro's current addresses: a business address of 30 Lewis St. Hartford, Connecticut 06103; a home and mailing address of 83 Johnson Road, Marlborough, Connecticut 06447.
3. Hybrid first was licensed by the Division as a Massachusetts business entity insurance producer on June 15, 2012.
4. Hybrid's business entity insurance producer license was terminated for failure to renew effective April 15, 2014.

5. At all times pertinent to this proceeding the following business address and mailing address has appeared on the records of the Commissioner as Hybrid's current address: 8 Griffin Road, Suite #103, Windsor, Connecticut 06095.

6. On November 14, 2013, the Connecticut Insurance Department ("Connecticut") by an Order for Default Judgment and Order of Revocation ("Connecticut revocation order") revoked all licenses issued to O'Garro for violations of Connecticut insurance laws. See Exhibit A of the OTSC.

7. O'Garro was a resident of Connecticut when Connecticut revoked his Connecticut resident insurance producer license. See Exhibit A of the OTSC.

8. The Connecticut revocation order against O'Garro was based on O'Garro's several misappropriations of insurance premiums, his failure timely to remit insurance premiums, his attempt to induce a premium finance company to finance premiums on four fake companies, his failure to notify Connecticut of an administrative action taken against him by the Commonwealth of Virginia State Corporation Commission, and his failure to comply with requests for information from Connecticut. See Exhibit A of the OTSC.

9. O'Garro did not disclose to the Division the administrative action taken against him by Connecticut.

10. O'Garro on November 14, 2013, was the owner and licensed applicant for Hybrid in Connecticut. See Complaint in Exhibit A of the OTSC.

11. On November 14, 2013, Connecticut revoked all licenses issued to Hybrid for violations of Connecticut insurance laws. See Exhibit A of the OTSC.

12. The Connecticut revocation order against Hybrid was based on several misappropriations of insurance premiums, failure timely to remit insurance premiums, an attempt to induce a premium finance company to finance premiums on four fake companies, failure to notify Connecticut of an administrative action taken by the Commonwealth of Virginia State Corporation Commission, and failure to comply with requests for information from Connecticut. See Exhibit A of the OTSC.

13. Hybrid did not disclose to the Division the administrative action taken against it by Connecticut.

14. On December 19, 2013, the Kentucky Department of Insurance ("Kentucky") issued an Order of Revocation against O'Garro, revoking his Kentucky inactive non-resident insurance agent license. See Exhibit B of the OTSC.

15. O'Garro did not disclose to the Division the administrative action taken against him by Kentucky.

16. Effective December 26, 2013, the Georgia Office of Commissioner of Insurance ("Georgia") revoked O'Garro's non-resident insurance agent license and his non-resident surplus lines broker license for having had his insurance licenses revoked by Connecticut. See Exhibit C of the OTSC.

17. O'Garro did not disclose to the Division the administrative action taken against him by Georgia.

18. O'Garro was the sole Officer and Responsible Individual for Hybrid listed in Georgia's records. See Exhibit C of the OTSC.

19. Effective December 26, 2013, Georgia revoked Hybrid's non-resident insurance agency license for having had its insurance licenses revoked by Connecticut. See Exhibit C of the OTSC.

20. Hybrid did not disclose to the Division the administrative action taken against it by Georgia.

21. On January 16, 2014, the Ohio Department of Insurance ("Ohio") revoked O'Garro's non-resident insurance agent license for having his Virginia insurance agent license revoked, his failure to pay his 2011 surplus lines tax and 25% penalty, and for his failure to appear for an interview as directed by a subpoena from Ohio. See Exhibit D of the OTSC.

22. O'Garro did not disclose to the Division the administrative action taken against him by Ohio.

23. Effective January 17, 2014, the Maine Department of Professional and Financial Regulation Bureau of Insurance ("Maine") revoked O'Garro's nonresident insurance producer license for having his Connecticut resident insurance producer license revoked, for having his Virginia insurance agent license revoked, for his failure to report the Virginia administrative

action to Maine, and because he no longer was currently licensed as a resident and in good standing in his home state. See Exhibit E of the OTSC.

24. O'Garro did not disclose to the Division the administrative action taken against him by Maine.

25. Effective January 31, 2014, the State of Rhode Island and Providence Plantations Department of Business Regulation ("Rhode Island") revoked O'Garro's non-resident insurance producer license for violating insurance laws, or violating regulations, subpoenas or orders of the Rhode Island Insurance Commissioner or of another state's insurance commissioner; for having his Connecticut resident insurance producer license revoked and his State of Arizona license suspended; and for his failure to report to Rhode Island any administrative action taken against him in another jurisdiction. See Exhibit F of the OTSC.

26. O'Garro did not disclose to the Division the administrative action taken against him by Rhode Island.

Analysis and Conclusions of Law

On the basis of the record, consisting of the OTSC and the exhibits attached to it, and the Findings of Fact as set forth above, I now make the following Conclusions of Law.

O'Garro

1. O'Garro subjected himself to discipline pursuant to § 162R(a)(2) by violating the insurance laws of Connecticut, Kentucky, Georgia, Ohio, Maine, and Rhode Island.

2. O'Garro subjected himself to discipline pursuant to § 162R(a)(4) by improperly withholding, misappropriating, or converting monies that he received in the course of doing insurance business in Connecticut.

3. O'Garro subjected himself to discipline pursuant to § 162R(a)(7) by engaging in unfair trade practices or fraud in Connecticut.

4. O'Garro subjected himself to discipline pursuant to § 162R(a)(8) by using fraudulent, coercive, or dishonest practices and demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in Connecticut.

5. O'Garro's actions in Connecticut -- improperly withholding, misappropriating, or converting monies that he received in the course of doing insurance business; engaging in unfair trade practices or fraud; using fraudulent, coercive, or dishonest practices and demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business -- constitute unfair or deceptive acts or practices in the business of insurance and subject him to discipline for violation of Chapter 176D, § 2.

6. O'Garro subjected himself to discipline pursuant to § 162R(a)(9) by having his insurance licenses revoked by six other states (Connecticut, Kentucky, Maine, Georgia, Ohio, and Rhode Island).

7. O'Garro violated § 162V(a) six times; when he did not notify the Division of any of the administrative actions taken against him by Connecticut, Kentucky, Georgia, Ohio, Maine, and Rhode Island. O'Garro subjected himself to discipline pursuant to § 162R(a)(2) for each one of his six violations of § 162V(a).

8. Finally, pursuant to § 162N O'Garro is not eligible for a Massachusetts non-resident insurance license because his resident insurance producer license was revoked by his home state of Connecticut.

Hybrid

9. The Commissioner, pursuant to Chapter 175, § 162R(e), maintains jurisdiction over Hybrid although currently Hybrid is not licensed in Massachusetts.

10. Hybrid subjected itself to discipline pursuant to § 162R(a)(2) by violating the insurance laws of Connecticut and Georgia.

11. Hybrid subjected itself to discipline pursuant to § 162R(a)(4) by improperly withholding, misappropriating, or converting monies that it received in the course of doing insurance business in Connecticut.

12. Hybrid subjected itself to discipline pursuant to § 162R(a)(7) by engaging in unfair trade practices or fraud in Connecticut.

13. Hybrid subjected itself to discipline pursuant to § 162R(a)(8) by using fraudulent, coercive, or dishonest practices and demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in Connecticut.

14. Hybrid's actions in Connecticut -- improperly withholding, misappropriating, or converting monies that it received in the course of doing insurance business; engaging in unfair trade practices or fraud; using fraudulent, coercive, or dishonest practices and demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business -- constitute unfair or deceptive acts or practices in the business of insurance and subject it to discipline for violation of Chapter 176D, § 2.

15. Hybrid subjected itself to discipline pursuant to § 162R(a)(9) by having its insurance licenses revoked by two other states (Connecticut and Georgia).

16. Hybrid violated § 162V(a) two times; when it did not notify the Division of either of the administrative actions taken against it by Connecticut and Georgia. Hybrid subjected itself to discipline pursuant to § 162R(a)(2) for each one of these violations of § 162V(a).

Discipline

Chapter 175, §162R(a), authorizes the Commissioner to place an insurance producer on probation, to suspend or revoke a producer's license, or to levy on him or her a civil penalty in accordance with Chapter 176D, § 7, or to take any combination of these actions, for 14 enumerated causes.

O'Garro

The causes for discipline of O'Garro consist of § 162R(a)(2), § 162R(a)(4), § 162R(a)(7), § 162R(a)(8), § 162R(a)(9), and Chapter 176D, § 2. Each of these causes represents a serious divergence from the behavior justifiably expected of a Massachusetts insurance licensee. O'Garro has breached his duties owed to his clients and has failed to fulfill his responsibilities to the Division as his licensing authority. So serious is each cause that I order discipline for each cause independently; I do not order discipline cumulatively for all causes.

I revoke all of O'Garro's Massachusetts insurance licenses pursuant to § 162R(a)(2) for violating the insurance laws of Connecticut, Kentucky, Georgia, Ohio, Maine, and Rhode Island.

I revoke all of O'Garro's Massachusetts insurance licenses pursuant to § 162R(a)(4).

I revoke all of O'Garro's Massachusetts insurance licenses pursuant to § 162R(a)(7).

I revoke all of O'Garro's Massachusetts insurance licenses pursuant to § 162R(a)(8).

I revoke all of O'Garro's Massachusetts insurance licenses pursuant to § 162R(a)(9).

I revoke all of O'Garro's Massachusetts insurance licenses pursuant to Chapter 176D, § 2.

I assess a civil penalty under Chapter 176D, § 7, of \$1,000.00 for each one of O'Garro's six violations of § 162V(a), and for these six violations I revoke all of O'Garro's Massachusetts insurance licenses pursuant to § 162R(a)(2).

Hybrid

The causes for discipline of Hybrid consist of § 162R(a)(2), § 162R(a)(4), § 162R(a)(7), § 162R(a)(8), § 162R(a)(9), and Chapter 176D, § 2. Each of these causes represents a serious divergence from the behavior justifiably expected of a Massachusetts insurance licensee. Hybrid has breached its duties owed to its clients and has failed to fulfill its responsibilities to the Division as its licensing authority. So serious is each cause that I order discipline for each cause independently; I do not order discipline cumulatively for all causes.

I revoke all of Hybrid's Massachusetts insurance licenses pursuant to § 162R(a)(2) for violating the insurance laws of Connecticut and Georgia.

I revoke all of Hybrid's Massachusetts insurance licenses pursuant to § 162R(a)(4).

I revoke all of Hybrid's Massachusetts insurance licenses pursuant to § 162R(a)(7).

I revoke all of Hybrid's Massachusetts insurance licenses pursuant to § 162R(a)(8).

I revoke all of Hybrid's Massachusetts insurance licenses pursuant to § 162R(a)(9).

I revoke all of Hybrid's Massachusetts insurance licenses pursuant to Chapter 176D, § 2.

I assess a civil penalty under Chapter 176D, § 7, of \$1,000.00 for each of Hybrid's two violations of § 162V(a), and for these two violations I revoke all of Hybrid's Massachusetts insurance licenses pursuant to § 162R(a)(2).

ORDERS

After due notice, hearing and consideration, it is hereby ORDERED:

Earl O. O'Garro

1. That Earl O. O'Garro shall cease and desist from the conduct complained of in the Order to Show Cause filed on August 8, 2014;

2. That any and all insurance licenses issued to Earl O. O'Garro by the Massachusetts Division of Insurance are hereby revoked;

3. That Earl O. O'Garro shall return to the Massachusetts Division of Insurance any licenses in his possession, custody or control;

4. That Earl O. O'Garro is, from the date of this order and decision, prohibited from directly or indirectly transacting any insurance business or acquiring, in any capacity whatsoever, any insurance business in the Commonwealth of Massachusetts;

5. That Earl O. O'Garro shall comply with the provisions of Chapter 175, § 166B, and dispose of any and all interests in Massachusetts as proprietor, partner, stockholder, officer or employee of any licensed insurance producer; and

6. That Earl O. O'Garro shall pay to the Massachusetts Division of Insurance **within 30 days of the entry of this Order and Decision on Petitioner's Motion for Summary Decision** a civil penalty of **Six Thousand Dollars (\$6,000.00)** pursuant to Chapter 175, § 162R(a)(2), and Chapter 176D, § 7.

Hybrid Insurance Agency, LLC

7. That Hybrid Insurance Agency, LLC shall cease and desist from the conduct complained of in the Order to Show Cause filed on August 8, 2014;

8. That any and all insurance licenses issued to Hybrid Insurance Agency, LLC by the Massachusetts Division of Insurance are hereby revoked;

9. That Hybrid Insurance Agency, LLC shall return to the Massachusetts Division of Insurance any licenses in its possession, custody or control;

10. That Hybrid Insurance Agency, LLC is, from the date of this order and decision, prohibited from directly or indirectly transacting any insurance business or acquiring, in any capacity whatsoever, any insurance business in the Commonwealth of Massachusetts;

11. That Hybrid Insurance Agency, LLC shall comply with the provisions of Chapter 175, § 166B, and dispose of any and all interests in Massachusetts as proprietor, partner, stockholder, officer or employee of any licensed insurance producer; and

12. That Hybrid Insurance Agency, LLC shall pay to the Massachusetts Division of Insurance **within 30 days of the entry of this Order and Decision on Petitioner's Motion for**

*Order and Decision on Petitioner's Motion for Summary Decision
Division of Insurance v. Earl O. O'Garro and Hybrid Insurance Agency, LLC, Respondents;
Docket No. E2014-09*

Summary Decision a civil penalty of **Two Thousand Dollars (\$2,000.00)** pursuant to Chapter 175, § 162R(a)(2), and Chapter 176D, § 7.

A copy of this **Order and Decision on Petitioner's Motion for Summary Decision** shall be sent by the Docket Clerk by regular first class mail, postage prepaid, to Earl O. O'Garro at 30 Lewis Street, Hartford, CT 06103 and at 83 Johnson Road, Marlborough, CT 06447; and to Hybrid Insurance Agency, LLC, at 8 Griffin Road, Suite #103, Windsor, CT 06095.

Filed: October 30, 2014

Stephen M. Sumner
Presiding Officer

This decision may be appealed to the Commissioner of Insurance pursuant to Massachusetts General Laws Chapter 26, § 7.

Robert J. Kelly, Esquire
Counsel to the Commissioner
Division of Insurance
1000 Washington Street
Boston, MA 02118

Earl O. O'Garro
30 Lewis St.
Hartford, CT 06103

Earl O. O'Garro
83 Johnson Road
Marlborough, CT 06447

Hybrid Insurance Agency, LLC
8 Griffin Road, Suite #103
Windsor, CT 06095