



COMMONWEALTH OF MASSACHUSETTS

Office of Consumer Affairs and Business Regulation

DIVISION OF INSURANCE

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MICHAEL KALJOUW
COMMISSIONER OF INSURANCE

November 22, 2024

HARCOVER, LLC
Avi Rabbani
9790 W. Dixie Hwy. Ste. 1004
Aventura, Florida 33180

RE: HARDCOVER, LLC - SIU Investigation No. 10178

Dear Mr. Rabbani:

I represent the Massachusetts Division of Insurance ("Division") with regard to the above referenced investigation. Pursuant to an investigation conducted by the Division's Special Investigations Unit, the Division has cause to believe that HARDCOVER, LLC. ("HCL") has violated the Massachusetts insurance laws set forth below by the conduct detailed in this settlement letter.

According to Division licensing records, the non-resident business entity producer license for HCL expired for nonrenewal on or about November 2, 2023. On or about January 31, 2024, the Division received your business entity producer renewal application, however, because your license was not current with the Secretary of State's Office the Division was unable to renew your license until on or about July 30, 2024.

On or about July 31, 2024, the Division emailed HCL a letter which asked HCL to provide the total number of new policies issued (both new business and renewals), the amount of premium received and the amount of commissions received by HCL during the unlicensed period. Subsequently, in a letter dated August 12, 2024, you wrote that HCL renewed and/or sold nine policies in Massachusetts after January 21, 2014, during the unlicensed period generating \$17,785 in premium and \$2,088 in commissions.

The Division alleges that HCL committed at least 9 violations of M.G.L. c. 175, § 175 by acting as a business entity insurance producer without being licensed. The penalty for each violation is a fine of not less than ten nor more than one hundred dollars. The Division also alleges that each violation of M.G.L. c. 175, § 175 is a violation of M.G.L. c. 175, § 162R(a)(2). The penalty for each violation of M.G.L. c. 175, § 162R(a)(2) is a fine of not more than \$1,000.00 pursuant to M.G.L. c. 176D, § 7, having the agency's Massachusetts business entity insurance producer license placed on probation, suspended or revoked or a combination of these actions.

The Division proposes to resolve this matter through a settlement agreement, **without a fine**, if you agree to waive the right to a public hearing, agree to **cease and desist** from the above-alleged conduct. If you choose to accept the Division's offer, please sign this settlement agreement where provided below and return it to my attention, no later than **December 6, 2024**.

Although this correspondence does not constitute the required statutory notice of a public hearing, if this matter is not resolved by **December 6, 2024**, the Division intends to file its Order to Show Cause and will notify HCL of the hearing date.

Thank you for your prompt attention to this matter. Should you have any questions or wish to discuss this matter further, I may be reached via email at Matthew.Burke@mass.gov.


Sincerely,

Matthew M. Burke /s/

Matthew M. Burke
Counsel to the Commissioner

SIGNED: Representative of:
HARDCOVER, LLC

NAME: Avi Rabbani

SIGNATURE: 

TITLE: Founder

DATE: 11 / 26 / 2024