



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

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**MAURA HEALEY**  
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**MICHAEL CALJOUW**  
COMMISSIONER OF INSURANCE

December 23, 2024

Bene Care Insurance Services  
Jessica Nelson, Financial Operations Manager  
1260 Creek Street  
Webster, New York 14580

***RE: Bene Care Insurance Services - SIU Investigation No. 10204***

Dear Ms. Nelson:

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 Bene Care Insurance Services ("BCIS") 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 BCIS expired for nonrenewal on or about December 5, 2022, and was not renewed until December 3, 2024.

On or about December 3, 2024, the Division emailed BCIS a letter which asked BCIS 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 BCIS during the unlicensed period. On or about December 11, 2024, you responded to the Division via email that BCIS renewed and/or sold thirty four policies in Massachusetts during the unlicensed period generating \$150,037 in premium and \$18,072.27 in commissions.

The Division alleges that BCIS committed at least 34 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 if BCIS agrees to waive the right to a public hearing, agrees to cease and desist from the above-alleged conduct and **agrees to pay a fine of \$2500**. If BCIS accepts the Division's settlement offer in this letter, please have an authorized individual sign this settlement letter where provided below and return it to my attention along with a check made payable to the Commonwealth of Massachusetts, no later than **January 16, 2025**.

The Division considers the acceptance of this settlement agreement to constitute a reportable administrative event which must be included on BCIS's next Massachusetts business entity producer license renewal application. BCIS also may be required to report this action in other jurisdictions where it holds a business entity insurance producer license. This settlement agreement shall be construed under and governed by the laws of the Commonwealth of Massachusetts.

Although this correspondence does not constitute the required statutory notice of a public hearing, if this matter is not resolved by **January 16, 2025**, the Division intends to file its Order to Show Cause and will notify BCIS 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](mailto:Matthew.Burke@mass.gov).

Sincerely,



Matthew M. Burke  
Counsel to the Commissioner

SIGNED: Representative of:  
Bene Care Insurance Services

NAME: Jeffrey A. Bach

SIGNATURE: 

TITLE: VP / Partner

DATE: 1-14-2025