



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

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AND BUSINESS REGULATION

GARY D. ANDERSON
COMMISSIONER OF INSURANCE

September 27, 2019

Allen Financial Insurance Group, Inc.
Melissa Ventura
12424 N. 32nd Street #101
Phoenix, Arizona 85032

Allen Financial Ins. Group

OCT 21 2019

RECEIVED

RE: Allen Financial Insurance Group, Inc. – SIU Investigation No. 9617

Dear Ms. Ventura:

I represent the Massachusetts Division of Insurance (“Division”) with regard to the above-captioned investigation. Pursuant to an investigation conducted by the Division’s Special Investigations Unit, the Division has cause to believe that Allen Financial Insurance Group, Inc. (“AFIG”) has violated the Massachusetts insurance laws set forth below by the conduct detailed in this settlement letter.

According to Division licensing records, the nonresident business entity producer license for AFIG expired for nonrenewal on or about January 20, 2018 and was not renewed until June 6, 2018. Subsequently, on or about June 13, 2018 you were contacted by the Division and asked 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 during the unlicensed period from January 20, 2018 to June 6, 2018. According to the information you provided in an email dated March 14, 2019, 19 policies were issued by AFIG which generated \$4,789.38 in commissions.

The Division alleges that AFIG committed at least 19 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 and having the agency's Massachusetts business entity insurance producer license placed on probation, suspended or revoked.

The Division proposes to resolve this matter through a settlement if AFIG 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 \$750**. If AFIG chooses to accept the Division's offer, 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 **October 18, 2019**.

The Division considers the acceptance of this settlement to constitute a reportable administrative event which should be included on AFIG's next Massachusetts nonresident business entity producer license renewal application. AFIG also may be required to report this action in other jurisdictions where it holds a business entity insurance producer license. This 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 **October 18, 2019**, the Division intends to file its Order to Show Cause and will notify AFIG 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 at (617) 521-7321 or Matthew.Burke@mass.gov.

Sincerely,



Matthew M. Burke
Counsel to the Commissioner

SIGNED: Representative of:
Allen Financial Insurance Group, Inc.

NAME: Brent Allen

SIGNATURE: [Handwritten Signature]

TITLE: President

DATE: 10/25/2019