

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

In re:

Redpoint Resolutions, LLC
National Producer No. 19619774
Maine License Number AGN360734

**CONSENT AGREEMENT
AND ORDER**

Docket No. INS-21-212

Redpoint Resolutions, LLC (“Redpoint”), a non-resident insurance producer business entity, the Maine Superintendent of Insurance (“Superintendent”), and the Office of the Maine Attorney General (“Attorney General”) hereby enter into this Consent Agreement and Order (“Consent Agreement”) pursuant to 10 M.R.S. § 8003(5)(B) to resolve, without an adjudicatory proceeding, violations and alleged violations of the Insurance Code for which the Superintendent may impose discipline pursuant to 24-A M.R.S. §§ 1417 and 1420-K.

STATUTORY AUTHORITY

1. Under 24-A M.R.S. §§ 12-A and 1420-K, the Superintendent may issue a warning, censure, or reprimand to a licensee, may suspend, revoke or refuse to renew the license of a licensee, may impose conditions of probation on the licensee, may levy a civil penalty, or may take any combination of such actions, for violating any insurance laws, or violating any rule, regulation, subpoena, or order of the Superintendent. Pursuant to 10 M.R.S. § 8003(5)(B), the Superintendent may resolve a matter by entering into a consent agreement with a licensee and with the agreement of the Attorney General.

FACTS

2. The Superintendent is the official charged with administering and enforcing Maine’s insurance laws and regulations, and the Bureau of Insurance (“Bureau”) is the administrative agency with such jurisdiction. The Superintendent has jurisdiction over this matter pursuant to 24-A M.R.S. §§ 12-A and 211.
3. UnivOps Insurance Services LLC (UnivOps), NPN 16842424, is an insurance producer business entity with its principal place of business in Houston, Texas. It has been licensed in Maine since May 16, 2013.
4. Redpoint is an insurance producer business entity with its principal place of business in Houston, Texas. It has been licensed in Maine since September 10, 2020.
5. Redpoint describes itself as a medical and travel security risk company providing travel assistance, evacuation, rescue and outsources security operations to its members. Redpoint offers its travel assistance services through stand-alone Membership Service Agreements (MSAs) or as part of a package with travel insurance benefits underwritten by State National and produced through UnivOps (bundled MSAs).

6. In February 2020, the Bureau received an inquiry regarding Redpoint's activities in the state of Maine and, after a review of Redpoint's website, opened an investigation.
7. After a review of Redpoint's online advertising and MSAs, the Bureau identified multiple statements that could lead a consumer to believe that Redpoint was a licensed insurance producer selling travel insurance. For example:
 - a. Redpoint's website included multiple references to travel insurance provided by Redpoint and references to "our programs" which included travel assistance services in addition to travel insurance.
 - b. Redpoint's customer service number included a recorded message stating: "Thank you for calling Redpoint Travel Insurance."
 - c. Redpoint's bundled MSAs included the header: "[CAVALRY/RIPCORD/HARBOR] TRAVEL INSURANCE Provided by Redpoint Resolutions LLC."
8. The Schedule of Services in Redpoint's bundled MSAs, Cavalry, Ripcord, and Harbor, included benefits for accident or sickness medical expense and accidental death and dismemberment. These benefits were not underwritten by an insurance company and claims were to be paid by Redpoint. Redpoint does not hold a certificate of authority to act as an insurer in the State of Maine. At least 36 bundled MSAs were sold in Maine between January 1, 2017 and June 1, 2020 which included these benefits¹.
9. Redpoint proactively took steps to correct deficiencies as they were identified during the Bureau's investigation. Redpoint updated the names of their products from "Travel Insurance" to "Travel Programs," made significant modifications to their website to reduce the risk of consumer confusion, and the company no longer offers accident or sickness medical expense and accidental death and dismemberment benefits in the state of Maine as part of their MSAs.

CONCLUSIONS OF LAW

10. As described in Paragraph 7, Redpoint's advertising and MSAs included multiple references that would lead a consumer to believe that Redpoint was selling, soliciting, and negotiating insurance. Redpoint was not licensed as an insurance producer until September 2020. This is a violation of 24-A M.R.S. § 1411(1) which prohibits a person from acting as or purporting to be an insurance producer or engaging in producer activities unless licensed.
11. As described in Paragraph 8, by offering insurance benefits to Maine consumers and entering into insurance contracts as an indemnitor, Redpoint acted as an insurer without a certificate of authority in violation of 24-A M.R.S. § 404(1).

COVENANTS

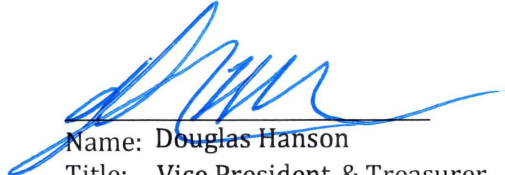
¹ Redpoint has not paid any Maine claims for benefits for medical expenses or accidental death and dismemberment. One claim for medical benefits was submitted by a Maine insured; however, the claim was withdrawn as the insured's medical expenses were covered by their primary insurance.

12. Redpoint agrees to the Statement of Facts and Violations of Law stated above and agrees that such actions make it subject to disciplinary action
13. Redpoint agrees to the imposition of a civil penalty in the amount of Ten Thousand Dollars (\$10,000), which Redpoint will remit to the Maine Bureau of Insurance at the time of returning this signed agreement. Payment shall be by check or money order made out to "Treasurer, State of Maine."
14. Redpoint agrees that it will obtain all necessary licenses required by the Maine Insurance Code based on its activities in the State of Maine moving forward.
15. Nothing in this Agreement shall affect the rights or interests of any person who is not a party to this Agreement.
16. This Consent Agreement constitutes an Order of the Superintendent. A violation of its terms is enforceable by the Superintendent pursuant to 24-A M.R.S. §§ 12-A and 211.
17. This Consent Agreement is also enforceable by an action in Maine Superior Court pursuant to 24-A M.R.S. § 214, 10 M.R.S. § 8003(5)(B), and 14 M.R.S. § 3138.
18. This Consent Agreement is not subject to appeal. Redpoint waives any further hearings or appeals regarding the matters that are the subject of this Consent Agreement.
19. This Consent Agreement may be modified only by a written agreement executed by all of the parties hereto.
20. This Consent Agreement is a public record within the meaning of 1 M.R.S. § 402(3) and will be available for inspection and copying by the public pursuant to 1 M.R.S. § 408-A. It will be reported to the Regulatory Information Retrieval System ("RIRS") database of the National Association of Insurance Commissioners ("NAIC").
21. By the duly-authorized signatures of its representatives on this Consent Agreement, Redpoint warrants that they have consulted with counsel before signing this Consent Agreement or has knowingly and voluntarily decided to proceed in this matter without consulting counsel, that they understand this Consent Agreement, and that they enter into this Consent Agreement voluntarily and without coercion of any kind from any person.
22. In consideration of Redpoint's execution of and compliance with the terms of this Consent Agreement, the Superintendent and Attorney General agree to forgo pursuing against Redpoint any further disciplinary measures or other civil or administrative sanctions arising under the Maine Insurance Code concerning the specific conduct described in this Consent Agreement, other than those agreed to herein. However, should Redpoint violate any provision of this Consent Agreement, they may be subject to any available remedy for the violation.

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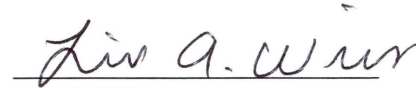
REDPOINT RESOLUTIONS, LLC

Dated: December 22, 2021


Name: Douglas Hanson
Title: Vice President & Treasurer


FOR THE OFFICE OF THE MAINE ATTORNEY GENERAL

Dated: 1/18, 2022


Lisa A. Wilson
Assistant Attorney General

THE SUPERINTENDENT OF THE MAINE BUREAU OF INSURANCE

Dated: 1/24, 2022


Eric A. Cioppa
Superintendent