

1 CALIFORNIA DEPARTMENT OF INSURANCE
2 LEGAL DIVISION

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9 Attorneys for the
10 CALIFORNIA DEPARTMENT OF INSURANCE

11 **BEFORE THE INSURANCE COMMISSIONER**
12 **OF THE STATE OF CALIFORNIA**

13 In the Matter of

14 File No.: VA202100169

15 **Complete Care Home Warranty,**
16 **LLC**, a New York state business
17 entity [Entity ID 5535295]
18 ([www.completecarehomewarranty](http://www.completecarehomewarranty.com)
19 [.com](http://www.completecarehomewarranty.com)),

20 **ORDER TO CEASE AND DESIST;**
21 **NOTICE OF RIGHT TO HEARING; and**
22 **MONETARY PENALTY**
23 **(Calif. Ins. Code §12921.8)**

24 Respondent.

25 TO: COMPLETE CARE HOME WARRANTY, LLC., with its address at 1908 Coney
26 Island Avenue, Brooklyn, NY 11223, and to its officers, directors, employees, trustees,
27 agents, affiliates and service representatives.

28 WHEREAS, California Insurance Code §12921.8(a)(1) authorizes the Insurance
Commissioner of the State of California (Commissioner) to issue a cease and desist order
against any person who has acted in a capacity for which a license, registration, or
certificate of authority to conduct insurance business in the State of California is required
but not possessed; and,

WHEREAS, California Insurance Code §12921.8(c) authorizes the Commissioner

1 to issue a Cease and Desist Order without holding a hearing prior to issuance of the
2 Order; and,

3 WHEREAS, from not later than May 17, 2021, COMPLETE CARE HOME
4 WARRANTY, LLC., has through the internet, including through the website identified as
5 www.completecarehomewarranty.com (Website), through the toll free telephone line (860)
6 777-0204 (Toll Free Number), and through other means and devices, solicited the
7 purchase of home protection contracts within the meaning of California Insurance Code
8 §12740(a) (Home Protection Contracts) by persons residing in California; and,

9 WHEREAS, from not later than May 17, 2021, Respondent solicited the purchase of
10 Home Protection Contracts through the internet including through its Website, and through
11 mail and e-mails sent to persons residing in California; and,

12 WHEREAS, from not later than May 17, 2021, Respondent has maintained an
13 internet presence, including through its Website, advertised on the internet, and transacted
14 Home Protection Contracts by, among other things, providing contract fee or premium
15 quotes to California residents, accepting applications for contracts from persons residing in
16 California, and communicating with persons residing in California regarding one or more
17 terms of a Home Protection Contract; and,

18 WHEREAS, Respondent has not at any time held, and does not now hold, a home
19 protection company license issued pursuant to California Insurance Code §12744
20 authorizing it to issue or offer Home Protection Contracts in California and has not at any
21 time held, and does not now hold, a certificate of authority to transact Home Protection
22 Contracts issued pursuant to California Insurance Code §§700 and 120; and,

23 WHEREAS, Respondent has acted in a capacity for which a home protection
24 company license or certificate of authority is required, as set forth above; and,

25 NOW THEREFORE,

26 RESPONDENT IS HEREBY ORDERED TO IMMEDIATELY CEASE AND DESIST
27 from soliciting, negotiating, issuing, or renewing any Home Protection Contract in California
28 with residents of California, through any means, including through its Website, the internet

1 (including via e-mail), the Toll-Free Number, or otherwise and IMMEDIATELY CEASE AND
2 DESIST collecting contract fees from any California resident through any means.

3 **NOTICE OF MONETARY PENALTY**

4 PLEASE TAKE NOTICE that pursuant to Insurance Code §12921.8, the
5 Commissioner may impose a monetary penalty equal to five times the amount of money
6 received by Respondent while acting in the capacity for which a home protection company
7 license is required but was not possessed, or five thousand dollars (\$5,000) for each day
8 that Respondent acted in the capacity for which a home protection company license is
9 required but was not possessed, whichever is greater.

10
11 **NOTICE OF RIGHT TO HEARING**

12 Insurance Code Section 12921.8(c) provides in part, as follows:

13 “A person to whom a cease and desist order is issued,
14 may, within seven days after service of the order . . . request a
15 hearing by filing a request for a hearing with the
16 commissioner.”

17 If you desire a hearing in this matter, your written request for a hearing must be
18 received within seven days after you are served with this Order to Cease and Desist. The
19 seven days begins to run on the day after the day you are served, and if the seventh day
20 falls on a weekend, the period in which your request must be filed is extended until Monday
21 or the next business day if Monday is a holiday.

22 //

23 A written request for a hearing must be addressed to:

24 Michael Tancredi
25 Assistant Chief Counsel
26 California Department of Insurance, Legal Division
27 300 South Spring St., 12th Floor
28 Los Angeles, CA 90013
Michael.Tancredi@insurance.ca.gov


A copy of the request must also be sent to:

1 James Browne
2 Senior Attorney
3 California Department of Insurance, Legal Division
4 1901 Harrison St, 4th Floor
5 Oakland, CA 94612
6 James.Browne@insurance.ca.gov

7 PLEASE TAKE NOTICE that you are being served pursuant to Insurance Code
8 §§12743(f), 1610 through 1612, and 12931 under which the commission of the acts set
9 forth in this Order to Cease and Desist Pursuant to Insurance Code Section 12921.8 and
10 Notice of Monetary Penalty constitute your appointment of the Commissioner as your
11 attorney and agent for service of process. If you do not respond within the time period set
12 forth above, your default will be taken and the Commissioner will enter an order imposing
13 the statutory monetary penalty specified herein.

14 IN WITNESS WHEREOF, I have hereunto set my hand and affixed by official seal,
15 this 30th day of August, 2021.

16 RICARDO LARA
17 Insurance Commissioner

18 By: 
19 _____
20 Sara Urakawa
21 Attorney