

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of Unlicensed Activity of:

**AMAZON WARRANTY  
ADMINISTRATORS OF ARIZONA, LLC  
DBA AMAZON HOME WARRANTY**

Respondent.

**No. 22A-054-INS**

**ORDER TO CEASE AND DESIST**

The Arizona Department of Insurance and Financial Institutions (“Department”) received evidence that **Amazon Warranty Administrators of Arizona, LLC dba Amazon Home Warranty (“AWA” or “Respondent”)** has unlawfully offered or issued service contract(s) in the state of Arizona without obtaining a permit by the Director. Accordingly, the Director of the Department (“Director”) makes the following Findings of Fact and Conclusions of Law and enters the following Order pursuant to A.R.S. § 20-1095.09(B).

**FINDINGS OF FACT**

1. Respondent is an Arizona domiciled limited liability company.
2. The Department originally issued a service company permit to Respondent on March 22, 2019.
3. Respondent renewed its service company permit with the Department on May 5, 2020, effective January 1, 2020 through December 31, 2020.

1           4.       Respondent also renewed its service company permit with the Department on  
2 December 16, 2020, effective January 1, 2021 through December 31, 2021.

3           5.       On or about December 30, 2021, the Department received Respondent's  
4 renewal application and payment of the renewal fee for calendar year 2022.

5           6.       During the renewal process, the Department determined that Respondent's  
6 financial statements reflected a negative equity position and initiated an inquiry with the  
7 company.

8           7.       On or about January 14, 2022, the Department sent an email to Stephen  
9 Kiepke, Respondent's attorney, at [skiepke@meenanlawfirm.com](mailto:skiepke@meenanlawfirm.com) requesting that  
10 Respondent provide a written explanation, by March 31, 2022, as to the negative equity  
11 reflected in Respondent's balance sheets.

12           8.       On or about February 4, 2022, the Department sent another email to Mr.  
13 Kiepke and Kiersten Denny at [kdenny@meenanlawfirm.com](mailto:kdenny@meenanlawfirm.com), requesting a response to the  
14 Department's January 14 communication.

15           9.       On or about February 7, 2022, the Department received a response from Ms.  
16 Denny stating that "[t]he company is working on a response to this request ... We expect to  
17 have a response to you by the March 31, 2022 deadline."

18           10.      Respondent failed to provide a response to the Department's January 14  
19 request the by March 31, 2022. Respondent has not reached out to the Department since.

20           11.      On or about April 4, 2022, the Department sent notification to Mr. Keipke via  
21 email, advising him that Respondent's "renewal application filing is deemed withdrawn."  
22

1           12.    On or about April 5, 2022, the Department sent a Notice of Permit Expiration  
2 via email to Respondent’s designated person of contact at [marc@amazonwc.com](mailto:marc@amazonwc.com) informing  
3 that Respondent’s service company permit expired on December 31, 2021.

4           13.    On or about August 8, 2022, N.L. filed a complaint with the Department  
5 alleging that Respondent refused to cover the replacement of her A/C unit, though the A/C  
6 unit should have been covered.

7           14.    The Department commenced an investigation into N.L.’s matter.

8                   a) On or about September 8, 2022, the Department, via email correspondence  
9                   sent to [dmendoza@ahwp.com](mailto:dmendoza@ahwp.com), requested that Respondent provide complete  
10                   records, claim file and a response to N.L.’s complaint by September 29,  
11                   2022. Respondent failed to respond.

12                   b) On or about October 19, 2022, the Department sent a second email  
13                   correspondence to [dmendoza@ahwp.com](mailto:dmendoza@ahwp.com), [kdenny@meenanlawfirm.com](mailto:kdenny@meenanlawfirm.com),  
14                   and [marc@amazonwc.com](mailto:marc@amazonwc.com) requesting a response by November 1, 2022.  
15                   Respondent provided a response on the same date, October 19, 2022.

16                   c) The records provided by Respondent confirm that the sale of a home  
17                   warranty contract to N.L. occurred on February 27, 2022, during the time  
18                   Respondent’s permit was expired.

19                   d) Further, the Department’s investigation determined that Respondent  
20                   continues to advertise and provide quotes for service company contracts to  
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1 Arizona consumers through at least two (2) websites,<sup>1</sup> without currently  
2 holding an active permit to do so.

3 e) Respondent accepted a service contract application and provided a quote to  
4 the Department's investigator for an Arizona property via quote #331327.  
5 Investigator received two follow-up solicitation emails from AHW on that  
6 same date.

### 7 CONCLUSIONS OF LAW

8 15. The Director has jurisdiction over this matter.

9 16. Respondent's conduct, as described above, constitutes a violation of Title 20  
10 or any rule, subpoena or order of the Director. A.R.S. § 20-295(A)(2).

11 17. Respondent's conduct, as described above, constitutes offering and issuing  
12 service contracts without a permit. A.R.S. § 20-1095.01(A).

13 18. Respondent is not exempt from the permit requirement. A.R.S. § 20-  
14 1095.02(A).

15 19. Service company contracts issued by Respondent are enforceable and valid  
16 contracts. A.R.S. § 20-1095.05

17 20. Grounds exist for the Director to order Respondent to cease and desist from  
18 offering and issuing service contracts without a permit. A.R.S. § 20-1095.09(B).

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<sup>1</sup> <https://ahwp.com> and <https://www.investopedia.com/amazon-home-warranty-review-4844522>

1 **ORDER**

2 IT IS HEREBY ORDERED THAT:

3 1. Respondent shall immediately cease and desist from offering or issuing  
4 service contracts in Arizona without a permit.

5 2. Respondent shall continue to investigate and pay all claims arising out of acts  
6 covered by Respondent's service contracts issued to Arizona residents for so long as such  
7 claims may legally be brought against the contract holders.

8 3. Respondent shall, within forty-five (45) days of receipt of this Order, furnish  
9 the Department with a complete listing, to include contact information, of all Arizona  
10 residents and business who have purchased service contracts sold by Respondent and that  
11 Respondent reports to the Department all premiums collected or charged for policies sold  
12 covering Arizona risks.

13 4. This Order shall become effective immediately and shall remain in full force  
14 and effect until otherwise stayed, modified, vacated or set aside.

15 **NOTICE OF OPPORTUNITY FOR HEARING**

16 Pursuant to Title 20 of the Arizona Revised Statutes, Respondent is hereby notified  
17 that it may request a hearing pursuant to A.R.S. § 20-161 to contest the order to cease and  
18 desist. Such a request must be in writing and received at the following address within thirty  
19 (30) days from the date hereof:

20 Arizona Department of Insurance and Financial Institutions  
21 Attn: Gio Espinosa, Regulatory Legal Affairs Officer  
22 100 North 15<sup>th</sup> Avenue, Suite 261  
Phoenix, Arizona 85007-2630



1 **ORIGINAL** of the foregoing filed  
this 2<sup>nd</sup> day of November 2022, in the office of:

2  
3 Evan G. Daniels, Director  
4 Arizona Department of Insurance and Financial Institutions  
5 Attn: Ana Starcevic  
6 100 North 15<sup>th</sup> Avenue, Suite 261  
7 Phoenix, AZ 85007-2630

8 **COPY** of the foregoing mailed by Certified Mail,  
9 Delivery Receipt requested, the same date to:

10 Amazon Warranty Administrators of Arizona, LLC  
11 dba Amazon Home Warranty  
12 11201 North Tatum Boulevard, Suite 300  
13 Phoenix, AZ 85028 [Certified Mail No. 9489 0090 0027 6351 1226 88]  
14 Respondent

15 Legalinc Corporate Services Inc  
16 RE: Amazon Warranty Administrators of Arizona, LLC  
17 17470 N Pacesetter Way,  
18 Scottsdale, AZ 85255 [Certified Mail No. 9489 0090 0027 6351 1226 95]  
19 Statutory Agent for Respondent

20 Amazon Warranty Administrators of Arizona, LLC  
21 dba Amazon Home Warranty  
22 C/O Meenan PA  
PO Box 11247 [Certified Mail No. 9489 0090 0027 6351 1226 71]  
Tallahassee, FL 32302

23 **COPY** of the foregoing delivered/emailed same date, to:

24 Deian Ousounov, Assistant Director  
25 Gio Espinosa, Regulatory Legal Affairs Officer  
26 Ana Starcevic, Paralegal Project Specialist  
27 Catherine O'Neil, Consumer Legal Affairs Officer  
28 Steven Fromholtz, Licensing Manager  
29 Linda Lutz, Legal Assistant  
30 Wendy Greenwood, Investigation Supervisor  
31 Arizona Department of Insurance and Financial Institutions  
32 100 North 15th Avenue, Suite 261  
33 Phoenix, Arizona 85007-2630

1 Amazon Warranty Administrators of Arizona, LLC  
2 dba Amazon Home Warranty

3 [marc@amazonwc.com](mailto:marc@amazonwc.com)  
4 [dmendoza@ahwp.com](mailto:dmendoza@ahwp.com)

5 Amazon Warranty Administrators of Arizona, LLC  
6 dba Amazon Home Warranty  
7 C/O Meenan PA

8 [skiepke@meenanlawfirm.com](mailto:skiepke@meenanlawfirm.com)  
9 [kdenny@meenanlawfirm.com](mailto:kdenny@meenanlawfirm.com)

10 Attorney(s) for Respondent

11 *Ana Starcevic*

12 Francine Juarez

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