

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

MATTHEW GARVEY

(National Producer No. 18068137)

and

STRATEGIC LIFE PLANNING LLC

(National Producer No. 18528831)

Respondents.

No. 24A-060-INS

CONSENT ORDER

The Arizona Department of Insurance and Financial Institutions (“Department”) has received evidence that Matthew Garvey (“Mr. Garvey”) and Strategic Life Planning LLC (“Strategic”), collectively Respondents, violated provisions of Arizona Revised Statutes (“A.R.S.”) Title 20. Respondents wish to resolve this matter without the commencement of formal proceedings, and admit the following Findings of Fact are true, and consent to the entry of the following Conclusions of Law and Order.

FINDINGS OF FACT

1. Mr. Garvey was at all material times licensed as an Arizona non-resident insurance producer, National Producer Number 18068137, with a line of authority in life insurance. The Department first licensed Mr. Garvey on March 17, 2020. Mr. Garvey’s license is scheduled to expire on December 31, 2027.

1 2. Mr. Garvey’s mailing and business address of record with the Department is
2 419 Wallace Avenue, Appt. 4, Kentucky, Louisville, Kentucky 40207, and his email
3 address is mgarve5726@gmail.com.

4 3. Strategic was at all material times licensed as an Arizona non-resident
5 insurance producer, National Producer Number 18528831. The Department first licensed
6 Strategic on March 24, 2020. Strategic’s license is scheduled to expire on March 31, 2028.

7 4. Strategic’s business and mailing address of record with the Department is 148
8 Breckenridge Ln., Apt C, Louisville, Kentucky 40207, and its email address is
9 mgarve5726@gail.com.

10 5. Mr. Garvey is a Designated Responsible Licensed Producer for Strategic.

11 6. On or about February 20, 2024, the Department received a termination for
12 cause letter from Royal Neighbors of America Insurance Company (“Royal Neighbors”)
13 stating that Mr. Garvey issued three (3) policies without consumers’ consent one of which
14 was an Arizona resident T.B.

15 7. The Department commenced an investigation into this matter. The
16 Department’s investigation found the following:

17 a) On or about October 27, 2023, Arizona consumer T.B. filed a complaint with
18 Royal Neighbors alleging that Mr. Garvey filed without her consent and
19 forged her signature on the Application for Simplified Issue Individual Whole
20 Life Insurance and Authorization for Electronic Funds Transfer.

21 b) T.B. learned about the application after she received the application and
22 certification in the mail. T.B. reported the following incorrect information on

1 the policy application: telephone number; driver's license number and
2 expiration date; bank account information; and beneficiary's date of birth.
3 T.B. further reported that the application was missing her primary care
4 doctor's information and a list of medications.

5 c) On or about November 7, 2023, in his written response to the Royal Neighbor
6 investigation, Mr. Garvey stated that he met T.B. in her home, that he verified
7 all of the information in the application, and personally witnessed T.B. signing
8 the application.

9 d) T.B. denied that she ever met Mr. Garvey and completed a notarized Affidavit
10 of Forged Signature Claim dated December 18, 2023.

11 e) Further, a review of T.B.'s DocuSign application revealed a Virginia IP
12 address (68.225.178.16).

13 f) On or about February 22, 2024, the Department's investigator confirmed with
14 the Arizona Department of Transportation that the driver's license on T.B.'s
15 application was incorrect.

16 g) On or about February 22, 2024, the Department sent an email correspondence
17 to Mr. Garvey informing him of the T.B.'s complaint and requesting a
18 response to the allegations.

19 h) On or about February 29, 2024, Mr. Garvey responded to the Department's
20 request stating that he spoke with T.B. over the telephone around October 4,
21 2023, contrary to his initial statement to Royal Neighbors investigator when
22 he claimed that he met T.B. at her home. Mr. Garvey further stated that he

1 explained to T.B. that it “was an insurance application that he read to T.B.
2 “the disclosure paragraphs about electronic signature and asked her if
3 submitting was okay, which she said absolutely.”

4 i) In his subsequent response on the same date, February 29, 2024, Mr. Garvey
5 explained that he received T.B.’s information from Halosurance Leads
6 through a “live transfer” from their call center that has “opt-in leads They
7 take basic information, and they are the ones that provide the driver’s license
8 information.” Mr. Garvey admitted that he “did click the submit on the
9 DocuSign, but that was on the advice of [his] upline.”

10 **CONCLUSIONS OF LAW**

11 8. The Director has jurisdiction over this matter.

12 9. Respondents’ conduct, as described above, constitutes a violation of Title 20
13 or any rule, subpoena or order of the Director. A.R.S. § 20-295(A)(2).

14 10. Respondents’ conduct, as described above, constitutes using fraudulent,
15 coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or
16 financial irresponsibility in the conduct of business in this state or elsewhere. A.R.S. § 20-
17 295(A)(8).

18 11. Respondents’ conduct, as described above, constitutes forging another's name
19 to any document related to an insurance transaction. A.R.S. § 20-295(A)(10).

20 12. Grounds exist, for the Director to deny, suspend for not more than twelve
21 months, revoke or refuse to renew Respondents’ insurance producer licenses. A.R.S. § 20-
22 295(A).

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ORDER

IT IS HEREBY ORDERED THAT:

1. Matthew Garvey’s Arizona non-resident insurance producer license, National Producer No. 18068137, is revoked effective immediately.
2. Strategic Life Planning LLC’s Arizona non-resident insurance producer license, National Producer No. 18528831, is revoked, effective immediately.

Effective this 5th day of July, 2024.

Barbara D. Richardson

Barbara D. Richardson
Cabinet Executive Officer
Executive Deputy Director
Arizona Department of Insurance and Financial Institutions

CONSENT TO ORDER

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1. Respondents acknowledge that they been served with a copy of the foregoing Consent Order in the above-referenced matter, have read it, are aware of their right to an administrative hearing in this matter and have knowingly and voluntarily waived that right.

2. Respondents accept the personal and subject matter jurisdiction of the Department over them in this matter.

3. Respondents acknowledge that no promise of any kind or nature has been made to induce them to sign the Consent to Order and they have done so knowingly and voluntarily.


4. Respondents acknowledge and agree that the acceptance of this Consent to Order by the Director is solely to settle this matter and does not preclude the Department from instituting other proceedings as may be appropriate now or in the future. Furthermore, and notwithstanding any language in this Consent Order, this Consent Order does not preclude in any way any other state agency or officer or political subdivision of this state from instituting proceedings, investigating claims, or taking legal action as may be appropriate now or in the future relating to this matter or other matters concerning Respondents, including but not limited to violations of Arizona’s Consumer Fraud Act. Respondents acknowledge that, other than with respect to the Department, this Consent Order makes no representations, implied or otherwise, about the views or intended actions of any other state agency or officer or political subdivision of the state relating to this matter or other matters concerning Respondents.

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5. Respondents waive all rights to seek an administrative or judicial review or otherwise to challenge or contest the validity of this Consent Order and its accompanying parts before any court of competent jurisdiction.

6. Respondents acknowledge that this Consent Order is an administrative action that the Department will report to the National Association of Insurance Commissioners (NAIC). Respondents further acknowledge that they must report this administrative action to any and all states in which Respondents hold an insurance license and must disclose this administrative action on any license application.

7/3/2024
DATE


MATTHEW GARVEY
(NATIONAL PRODUCER NO. 18068137)

7/3/2024
DATE


STRATEGIC LIFE PLANNING LLC
(NATIONAL PRODUCER NO. 18528831)

1 **COPY** of the foregoing delivered via email
this 5th day of July, 2024, to:

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Matthew Garvey
3 419 Wallace Avenue, Apt. 4
Louisville, Kentucky 40207
4 Mgarve5726@gmail.com
Respondent

5

Strategic Life Planning LLC
6 148 Breckenridge Ln., Apt. C
Louisville, Kentucky 40207
7 Mgarve5726@gmail.com
Respondent

8

COPY of the foregoing delivered/mailed same date, to:

9

Deian Ousounov, Chief Financial Deputy Director
10 Alena Caravetta, Regulatory Legal Affairs Officer
Ana Starcevic, Project Specialist
11 Rachel Smith, Investigator
Catherine O'Neil, Consumer Regulatory Affairs Officer
12 Steven Fromholtz, Division Manager, Licensing
Linda Lutz, Legal Assistant, Licensing
13 Aqueelah Currie, Licensing Supervisor
Arizona Department of Insurance and Financial Institutions
14 100 North 15th Avenue, Suite 261
Phoenix, Arizona 85007-2630

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Ana Starcevic

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