

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED March 6, 2025 by AS

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

**ALLEN FINANCIAL INSURANCE
GROUP INC**
(NPN 3358150)

AND

**BRENT IRVING ALLEN DBA AMRISK
INSURANCE SERVICES**
(NPN 56626)

Respondents.

No. 25A- 024 -INS

**ORDER TO SUSPEND AND CEASE
AND DESIST**

The Arizona Department of Insurance and Financial Institutions (“Department”) received evidence that Allen Financial Insurance Group Inc (“Allen Financial”) and Brent Irving Allen dba Amrisk Insurance Services (“Mr. Allen”), collectively Respondents, are transacting insurance business in the State of Arizona without complying with the applicable provisions of Title 20 of Arizona Revised Statutes (“A.R.S.”). 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. §§ 20-295, 20-456.

FINDINGS OF FACT

1. Allen Financial currently holds two (2) types of Arizona resident licenses, national producer number 3358150, in insurance producer license with lines of authority in casualty, accident and health or sickness, property, and life insurance, and a surplus lines

1 broker license. The Department first issued a license to Allen Financial on March 12, 1991.
2 Allen Financial's license is scheduled to expire on March 31, 2028.

3 2. Mr. Allen currently holds two (2) types of Arizona resident licenses, National
4 Producer Number 56626, an insurance producer license with lines of authority in casualty,
5 accident and health or sickness, property, and life insurance, and a surplus lines broker
6 license. The Department first issued a license to Mr. Allen on June 14, 1971. Mr. Allen's
7 license is scheduled to expire on June 30, 2026.

8 3. Mr. Allen is a designated responsible individual for Allen Financial.

9 4. Respondents' addresses of record with the Department are 11111 North
10 Scottsdale Road, Suite 205J, Scottsdale, Arizona 85254-6732 (business); PO BOX 6230
11 Scottsdale, Arizona 85261-6230 (mailing); ballen@amriskusa.com and
12 brent.allen@eqgroup.com (email).

13 5. During January and February 2025, the Department received multiple
14 complaints against Respondents alleging multiple issues, including failure to respond to
15 consumers' inquiries and requests, failure to cancel policies upon consumers' request,
16 failure to refund premium payments, and failure to remit premium payments to the insurer.

17 6. On or about February 14, 2025, the Department received a Notice of Allen
18 Financial Insurance Group, Inc. Deficiencies and Affected Carriers and Potential Placement
19 into Receivership from Respondents' attorney stating, in part, that Allen Financial, due to a
20 perpetual embezzlement committed by a longtime bookkeeper, lost at average rate of
21 \$150,000 to \$200,000 per year in company's funds, for an approximate loss totaling \$1.1
22 million. Further, following the discovery of the embezzlement, Allen Financial lost

1 approximately 50% of its business. The Notice further stated that Allen Financial is
2 exposed to an approximate \$300,000 to \$500,000 financial deficiency.

3 7. On or about February 18, 2025, the Department requested Respondents'
4 response to the complaints' allegations.

5 8. On the same date, February 18, 2025, the Department conducted a telephonic
6 interview with Respondents' attorney. During the call, Respondents' attorney expressed the
7 following:

- 8 • Mr. Allen retired in 2018. At that time, he divested from Allen
9 Financial. The Chief Financial Officer, Michael Conn ("Mr. Conn")
10 took over operations of Allen Financial at that time.
- 11 • Mr. Allen remained the Designated Responsible Licensed Producer and
12 owner/statutory agent for Allen Financial.
- 13 • Allen Financial operated without major issues until 2023.
- 14 • In 2023, Allen Financial's largest affiliate company was acquired by
15 Berkshire Hathaway. Following this acquisition, Berkshire Hathaway
16 lowered the commission rates for the policies written by Allen Financial
17 from 30% to 10% and subsequently declined renewal of all surplus lines
18 contracts.
- 19 • Berkshire Hathaway's actions caused Allen Financial to lose its largest
20 revenue stream and suffer considerable financial difficulty.
- 21 • Mr. Conn began to pay employees using funds paid by policyholders
22 from the premium trust account. The trust account was depleted. All but

1 business of the insurer or person in any book, report or statement thereof. A.R.S. § 20-
2 447(B).

3 **ORDER**

4 IT IS HEREBY ORDERED THAT:

5 1. Allen Financial Insurance Group Inc.'s Arizona resident insurance producer
6 license, National Producer Number 3358150, is suspended effective immediately.

7 2. Brent Irving Allen's Arizona resident insurance producer license, National
8 Producer Number 56626, is suspended effective immediately.

9 3. Respondents shall immediately cease and desist from effectuating new or
10 renewal contracts of insurance and collecting premiums in Arizona.

11 4. Respondents shall provide a complete list of all current policyholders in
12 Arizona, including contact information and records relating to their existing and current
13 policies.

14 3. Respondents shall provide a complete list of all insurance companies, and the
15 accompanying contracts, that Respondents have contractual obligations with in effectuating
16 insurance business in Arizona.

17 4. Nothing in this Order shall limit Respondents' ability and duty to facilitate the
18 lawful administration of all current policies until all policies are canceled or transferred to
19 an insurer in accordance with applicable law.

20 **NOTICE OF OPPORTUNITY FOR HEARING**

21 Pursuant to Title 20 of the Arizona Revised Statutes, Respondents are hereby notified
22 that they may request a hearing pursuant to A.R.S. § 20-161 to contest the order to cease

1 and desist. Such a request must be in writing and received at the following address within
2 thirty (30) days from the date hereof:

3 Arizona Department of Insurance and Financial Institutions
4 Attn: Alena Caravetta, Regulatory Legal Affairs Officer
5 100 North 15th Avenue, Suite 261
6 Phoenix, Arizona 85007-2630

7 Upon receipt of a timely written request for hearing, the Department will issue an
8 order setting the time and place of the hearing.

9 Effective this 6th day of March, 2025.

10 *Barbara D. Richardson*

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Barbara D. Richardson, Director
12 Arizona Department of Insurance and Financial Institutions
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1 **COPY** of the foregoing delivered by E-mail
this 6th day of March, 2025, to:

2 Eric Moats, Esq.
3 May Potenza Baran & Gillespie
4 emoats@maypotenza.com
5 Attorney for Respondent

6 Allen Financial Insurance Group Inc and
7 Brent Irving Allen dba Amrisk Insurance Services
8 PO BOX 6230
9 Scottsdale, Arizona 85261-6230
10 ballen@amriskusa.com
11 brent.allen@eqgroup.com

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

13 Deian Ousounov, Chief Deputy Director of Finance
14 Allena Caravetta, Regulatory Legal Affairs Officer
15 Ana Starcevic, Project Specialist
16 Rachel Smith, Insurance Analyst
17 Steven Fromholtz, Division Manager
18 Aqueelah Currie, Licensing Supervisor
19 Arizona Department of Insurance and Financial Institutions
20 100 North 15th Avenue, Suite 261
21 Phoenix, Arizona 85007-2630

22 *Ana Starcevic*