

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED June 16, 2025 by AS

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

No. 25A-057-INS

BRAXTON MOON

CONSENT ORDER

(National Producer No. 20714359)

Respondent.

The Arizona Department of Insurance and Financial Institutions (“Department”) has received evidence that Braxton Moon (“Respondent”) violated provisions of Arizona Revised Statutes (“A.R.S.”) Title 20. Respondent wishes to resolve this matter without the commencement of formal proceedings, and admits the following Findings of Fact are true, and consents to the entry of the following Conclusions of Law and Order.

FINDINGS OF FACT

1. Respondent was at all material times licensed as an Arizona resident insurance producer, National Producer Number 20714359, with a line of authority in accident and health or sickness insurance. The Department first licensed Respondent on May 15, 2023. Respondent’s license is scheduled to expire on February 28, 2027.

2. Respondent’s mailing and business address of record with the Department is 1702 East Bell Road, Phoenix, Arizona 85022, and his email address is azmooner94@gmail.com.

3. On or about May 30, 2024, the Department received a notice of Respondent’s

1 termination for cause from Americo Financial Life and Annuity Insurance Company
2 (“AFLAIC”).

3 4. The Department commenced an investigation into this matter. The
4 Department’s investigation found the following:

- 5 • On or about June 11, 2024, the Department requested that AFLAIC provide
6 records and information related to Respondent’s termination for cause.
- 7 • On or about June 13, 2024, AFLAIC provided its investigative report related
8 to Respondent’s alleged fraudulent activity.
- 9 • A review of the report revealed that Respondent “first came to the attention of
10 AFLAIC when it was noticed that multiple client signatures on the
11 applications were signed with only initials and the handwriting appeared to
12 match Mr. Moon’s handwriting. This was confirmed when conducting a more
13 comprehensive review of Mr. Moon’s book of business.”
- 14 • The report contained an example of Respondent’s electronic signature and
15 initials, and eight (8) examples of consumers’ forged initials contained in the
16 applications. AFLAIC also provided to the Department copies of the
17 applications related to seven (7) Arizona consumers. When confronted by
18 AFLAIC, Respondent “admitted to signing documents on behalf of his clients.
19 He stated that he would conduct Zoom calls with these clients and would sign
20 their application documents for them with the clients’ permission when the
21 clients were unable to receive a text signature or email to obtain their
22 signature authorizations.” Respondent, however, denied signing applications

without consumers' consent.

- On or about June 13, June 26, and July 1, 2024, the Department notified Respondent of the complaint and requested his response and records related to the complaint's allegations. Respondent failed to respond to the Department's requests.
- On or about July 9, 2024, the Department issued a subpoena requesting that Respondent provide a comprehensive narrative response to the complaint's allegations and records pertaining to any contact and/or communication with Arizona consumers. The United States Postal Service's records showed that subpoena, however, was never delivered to Respondent.
- On or about July 26, 2024, Respondent responded to the Department's email correspondence requesting an extension to provide records.
- On the same date, July 26, 2024, Respondent provided a copy of his email correspondence with two (2) Arizona consumers stating that they consented to the policies Respondent submitted on their behalf.
- On or about November 19, 2024, the Department contacted the seven (7) Arizona consumers whose applications AFLAIC identified as fraudulent. One (1) of the Arizona consumers confirmed that she agreed to the application, one (1) email bounced back due to "the address couldn't be found, or is unable to receive mail," remaining five (5) consumers did not respond.
- Respondent did not provide any additional records related to the complaint's allegations.

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4 9. Respondent's conduct, as described above, constitutes failure to keep and make
5 available and open to the inspection of the Director records related to the insurance
6 transactions. A.R.S. § 20-290.

7 10. Grounds exist for the Director to deny, suspend for not more than twelve
8 months, revoke or refuse to renew Respondent's Arizona insurance producer license.
9 A.R.S. § 20-295(A).

11 **IT IS HEREBY ORDERED THAT:**

12 Braxton Moon's Arizona insurance producer license, National Producer Number
13 20714359, is revoked effective immediately.

Effective this 16th day of June, 2025.

15	<i>Maria Ailor</i>
16	Maria Ailor, Interim Director
17	Arizona Department of Insurance and Financial Institutions

CONSENT TO ORDER

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

2. Respondent accepts the personal and subject matter jurisdiction of the Department over them in this matter.

3. Respondent acknowledges 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. Respondent acknowledges and agrees 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 Respondent.

5. Respondent waives 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.

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

06/13/2025

DATE



BRAXTON MOON

(National Producer Number 20714359)

COPY of the foregoing delivered via email
this 16 day of June, 2025, to:

Braxton Moon
1702 East Bell Road
Phoenix, Arizona 85022
azmoon94@gmail.com.
Respondent

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

Alena Caravetta, Regulatory Legal Affairs Officer
Ana Starcevic, Project Specialist
Rachel Smith, Investigator
Catherine O'Neil, Consumer Regulatory Affairs Officer
Steven Fromholtz, Division Manager, Licensing
Linda Lutz, Legal Assistant, Licensing
Aqueelah Currie, Licensing Supervisor
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Ana Starcevic
