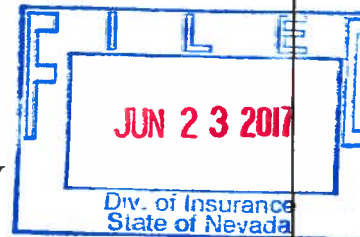


STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE



1
2
3
4 IN THE MATTER OF

CAUSE NO. 17.0149

5 **SECURE HOME WARRANTY,**

6 **Respondent.**

7
8 **ORDER TO CEASE AND DESIST**

9 The State of Nevada, Department of Business and Industry, Division of Insurance
10 (“Division”) sends greetings to:

11 SECURE HOME WARRANTY
12 1735 Market St., Suite 3750
13 Philadelphia, PA 19103
14 Phone: 1(888) 825-2621
Email: info@securehomewarranty.com
Website: securehomewarranty.com

FRANK ANDERSON, Sales Manager
SECURE HOME WARRANTY
1735 Market St., Suite 3750
Philadelphia, PA 19103
Phone: 1(888) 825-2621, Ext. 505
Email: frank@securehomewarranty.com

15 It is unlawful for corporations and/or persons to provide, issue, sell, or offer for sale,
16 service contracts in the state of Nevada without first obtaining a proper certificate of registration
17 from the Division pursuant to Chapter 690C of the Nevada Revised Statutes (“NRS”). NRS
18 690C.150. The Commissioner of Insurance (“Commissioner”) has exclusive jurisdiction to
19 regulate, enforce or effect full compliance with regard to the Insurance Code of the State of
20 Nevada, including NRS Chapter 690C. NRS 679B.120 and NRS 679B.130.

21 The Division has received at least six (6) consumer complaints from Nevada consumers
22 regarding Secure Home Warranty’s (“Secure”) failure to pay submitted claims. Secure is not
23 registered in Nevada as a service contract provider. The Division has received and verified,
24 credible information that Secure has provided, issued, sold, or offered for sale, service contracts
25 within Nevada without first obtaining a proper certificate of registration pursuant to NRS
26 690C.150. The Division has credible information that Secure is offering “home warranties” for
27 sale to Nevadans through the use of email and the website securehomewarranty.com. *Exhibits*
28 *A and B*. A Division Investigator, Ted Bader, responded to an email solicitation from Secure,

1 indicated that he and his home are in Nevada, and received an offer to purchase a “home
2 warranty” from Secure. *Exhibit B.*

3 WHEREAS, Secure’s conduct is injurious to the rights and interests of the public or
4 policyholders in this State, and emergency action is imperatively required.

5 WHEREAS, Secure may request a hearing regarding the instant Order in accordance
6 with the provisions of NRS 679B.310.

7 NOW, THEREFORE, PURSUANT TO NRS 679B.120 and 679B.140, SECURE IS
8 HEREBY ORDERED TO IMMEDIATELY CEASE AND DESIST FROM PROVIDING,
9 ISSUING, SELLING, OR OFFERING FOR SALE, SERVICE CONTRACTS WITHIN THE
10 STATE OF NEVADA.

11 IT IS FURTHER ORDERED THAT SECURE SHALL, within fifteen (15) days of
12 receipt of this Order, furnish to the Division a complete listing, including contact information,
13 of all Nevada residents who have purchased any service contracts, insurance or insurance-
14 related product from Secure.

15 IT IS FURTHER ORDERED THAT SECURE SHALL ADMINISTER the service
16 contracts existing in the State of Nevada and pay all legitimate claims now owing, and shall
17 work with the Division to resolve any existing or future consumer complaints.

18 IT IS FURTHER ORDERED THAT SECURE SHALL immediately provide a
19 disclaimer and/or disclosure on its internet website, marketing materials, written
20 communications and through oral communication, indicating that its service contracts and any
21 other services are not available to persons or entities in the state of Nevada.

22 FURTHER, SECURE IS HEREBY NOTIFIED that the Commissioner may, after notice
23 and opportunity to be heard, impose all of the following administrative fines:

- 24 • NRS 690C.120(1)(b), NRS 679B.185(1), fines of \$10,000 for each act or violation
- 25 • NRS 690C.330, fines of \$10,000 for similar violations;
- 26 • NRS 690C.120(1)(f), NRS 686A.030, NRS 686A.183(1)(a), fines of \$5,000 per
27 violation;

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- NRS 690C.120(1)(f), NRS 686A.040, NRS 686A.183(1)(a), fines of \$5,000 per violation;

FURTHER, SECURE IS HEREBY NOTIFIED that if Secure has information that will alter this Cease and Desist Order, or if it has any questions regarding this matter, it may contact Ted Bader, Senior Investigator, at 1818 East College Pkwy., Suite 103, Carson City, Nevada 89706; by telephone, (775) 687-0711; or by email, tbader@doi.nv.gov.

SO ORDERED this 25th day of June, 2017.



BARBARA D. RICHARDSON
Commissioner of Insurance

David Hall

From: David Hall <REDACTED by NV DOI >
Sent: Monday, June 19, 2017 9:03 AM
To: David Hall
Subject: Fwd: June Special Limited Time Offer! Call Now!

Begin forwarded message:

From: David Hall <REDACTED by NV DOI >
Date: Jun 19, 2017 at 8:58 AM
To: David Hall <REDACTED by NV DOI >
Subject: Fwd: June Special Limited Time Offer! Call Now!

Begin forwarded message:

From: Secure Home Warranty <scott@securehomewarranty.com>
Date: Jun 19, 2017 at 8:25 AM
To: REDACTED by NV DOI <REDACTED by NV DOI >
Subject: June Special Limited Time Offer! Call Now!

Having trouble viewing this email? [Click here](#)

Hi, just a reminder that you're receiving this email because you have expressed an interest in Secure Home Warranty. Don't forget to add scott@securehomewarranty.com to your address book so we'll be sure to land in your inbox!

You may [unsubscribe](#) if you no longer wish to receive our emails.





Take \$300.00 Off Any Plan &
Receive Free
Roof Leak Coverage today!
Call now to take advantage
[1-888-825-2621](tel:1-888-825-2621) (Option 1)

Offer Valid 6/13/2017 - 6/19/2017

[Click Here to See Whats Covered](#)

USE PROMO CODE: ROOF300

PURCHASE TODAY (6/19/2017)

AND RECEIVE ONE FREE SERVICE

CALL ON US (\$75.00 VALUE)!

Call now to take advantage! [1-888-825-2621](tel:1-888-825-2621)

Help manage the high costs of your home repairs. With our Safe, Secure, & Reliable Service, it's not a surprise that we are a leader in the home warranty industry. Call now and receive **\$300.00 Off any plan + Receive 2 Free Bonus Months & Free Ice Maker Coverage!** Don't forget to ask about our multi-policy discounts and referral discounts.

Contact our knowledgeable, experienced, and professional sales staff at [1-888-825-2621](tel:1-888-825-2621) (option 1) to take advantage of this offer.

Based off MSRP of \$749.99

***upfront payment only**

[See Whats Covered](#)

www.securehomewarranty.com

scott@securehomewarranty.com

Secure Home Warranty, 1735 Market Street Suite 3750, Philadelphia, PA 19103

SafeUnsubscribe™_quidproschmoe@gmail.com

[Forward this email](#) | [Update Profile](#) | [About our service provider](#)

Sent by scott@securehomewarranty.com in collaboration with

Constant Contact 

Try it free today

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

IN THE MATTER OF CAUSE NO. 17.0149
SECURE HOME WARRANTY,
Respondent.

AFFIDAVIT IN SUPPORT OF ORDER TO CEASE AND DESIST

I, affiant Ted Bader, do hereby attest, declare and affirm under penalty of perjury the following facts:

1. I am currently employed as a Compliance/Audit Investigator II assigned to the Legal Section of the State of Nevada, Department of Business and Industry, Division of Insurance ("Division"), and have been so employed since November 1, 2010.
2. Prior to my employment with the Division, I was employed as the Chief Investigator of the Washington State Office of the Insurance Commissioner from May of 1999 to October 31, 2010.
3. I have served in law enforcement since December 9, 1968.
4. On June 19, 2017, I was forwarded an electronic copy of an unsolicited email sent to Division attorney David Hall from Secure Home Warranty ("Secure"). *Exhibit 1*. Using the link provided in the email, I sent an email to Secure inquiring as to its offer for warranty coverage of roofs. *Exhibit 2*.
5. In my email I clearly indicated that my home is located in Nevada. *Exhibit 2*.
6. I received an email response from Frank Anderson, Sales Manager for Secure. Mr. Anderson indicated that he was aware that I am in the Pacific Time Zone, and offered significant discounts if I were to purchase a "policy." *Exhibit 3*.
7. I replied to Mr. Anderson's email and made further inquiries as to his product.
8. As of the date of this Affidavit, no response has been received to that email communication.

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9. As of the date on which Mr. Anderson and I exchanged emails, Secure was not a registered service contract provider in the State of Nevada, and a case file had already been opened regarding Secure selling and offering for sale service contracts (home warranties) in Nevada without proper registration.¹

10. I have reviewed six consumer complaints regarding Secure in which the consumers allege that Secure has failed to provide the services bargained for in the various service contracts.

11. Further your affiant sayeth naught.

TED BADER,
Compliance/Audit Investigator II

STATE OF NEVADA)
) ss
CARSON CITY)

SUBSCRIBED and SWORN to before me
this 22nd day of June, 2017, by Ted Bader.

Felecia Casci
NOTARY PUBLIC



¹ The Division has also received complaints from consumers to whom Secure has sold contracts stating that Secure has failed to pay claims made under the contracts.

Betsy Gould

Subject: FW: June Special Limited Time Offer! Call Now!

From: David Hall
Sent: Monday, June 19, 2017 10:39 AM
To: Ted Bader
Cc: Dave Erickson
Subject: FW: June Special Limited Time Offer! Call Now!

Here's the solicitation I got from Secure Home Warranty this morning.



David R. Hall
Insurance Counsel/Hearing Officer
1818 East College Parkway, Suite 103
Carson City, NV 89706
(775) 687-0708
dhall@doi.nv.gov

Follow us on Twitter: [@nevadadoi](https://twitter.com/nevadadoi)
Like us on Facebook: [Nevada Division of Insurance](https://www.facebook.com/NevadaDivisionofInsurance)

This communication, including any attachments, may contain confidential information and is intended only for the individual or entity to whom it is addressed. Any review, dissemination, or copying of this communication by anyone other than the intended recipient is strictly prohibited by the electronic Communications Privacy Act, 18 U.S.C. 2510-2521. If you are not the intended recipient, please contact the sender by reply Email, delete and destroy all copies of the original message.

From: David Hall [<mailto:REDACTED by NV DOI>]
Sent: Monday, June 19, 2017 9:03 AM
To: David Hall
Subject: Fwd: June Special Limited Time Offer! Call Now!

Begin forwarded message:

From: David Hall <REDACTED by NV DOI>
Date: Jun 19, 2017 at 8:58 AM
To: David Hall <REDACTED by NV DOI>
Subject: Fwd: June Special Limited Time Offer! Call Now!

Begin forwarded message:

From: Secure Home Warranty <scott@securehomewarranty.com>

Date: Jun 19, 2017 at 8:25 AM

To: REDACTED by NV DOI, REDACTED by NV DOI

Subject: June Special Limited Time Offer! Call Now!

Having trouble viewing this email? [Click here](#)

Hi, just a reminder that you're receiving this email because you have expressed an interest in Secure Home Warranty. Don't forget to add scott@securehomewarranty.com to your address book so we'll be sure to land in your inbox!

You may [unsubscribe](#) if you no longer wish to receive our emails.



Take \$300.00 Off Any Plan &
Receive Free
Roof Leak Coverage today!
Call now to take advantage
[1-888-825-2621](tel:1-888-825-2621) (Option 1)

Offer Valid 6/13/2017 - 6/19/2017

[Click Here to See Whats Covered](#)

USE PROMO CODE: ROOF300

PURCHASE TODAY (6/19/2017)
AND RECEIVE ONE FREE SERVICE
CALL ON US (\$75.00 VALUE)!

Call now to take advantage! 1-888-825-2621

Help manage the high costs of your home repairs. With our Safe, Secure, & Reliable Service, it's not a surprise that we are a leader in the home warranty industry. Call now and receive **\$300.00 Off any plan + Receive 2 Free Bonus Months & Free Ice Maker Coverage!** Don't forget to ask about our multi-policy discounts and referral discounts.

Contact our knowledgeable, experienced, and professional sales staff at 1-888-825-2621 (option 1) to take advantage of this offer.

Based off MSRP of \$749.99

***upfront payment only**

See Whats Covered

www.securehomewarranty.com

scott@securehomewarranty.com

Secure Home Warranty, 1735 Market Street Suite 3750, Philadelphia, PA 19103

[SafeUnsubscribe™ quidproschmoe@gmail.com](#)

[Forward this email](#) | [Update Profile](#) | [About our service provider](#)

Sent by scott@securehomewarranty.com in collaboration with

Constant Contact 

Try it free today

Betsy Gould

From: Ted Whatever **REDACTED by NV DOI**
Sent: Monday, June 19, 2017 11:08 AM
To: Ted Bader; David Hall
Subject: Fw: Your offer to a coworker, today only (ROOF300)

From: Ted Whatever **REDACTED by NV DOI**
Sent: Monday, June 19, 2017 6:01 PM
To: scott@securehomewarranty.com
Subject: Your offer to a coworker, today only (ROOF300)

Scott,

A friend of mine forwarded me your message regarding the roof leak coverage. I live in Nevada where it usually does not rain very often, but this last year it did and I found several leaks in my roof. What would it cost me to get your insurance policy to protect my home and get my roof repaired?

Ted Bader
1818 East College Parkway, Unit # 103
Carson City, NV 89706
REDACTED by NV DOI

Betsy Gould

From: Ted Whatever <REDACTED by NV DOI>
Sent: Monday, June 19, 2017 11:38 AM
To: Ted Bader; David Hall
Subject: Fw: Regarding your inquiry (Home warranty with roof coverage)

From: Frank A <frank@securehomewarranty.com>
Sent: Monday, June 19, 2017 6:13 PM
To: REDACTED by NV DOI
Subject: Regarding your inquiry (Home warranty with roof coverage)

Hi Ted,

Thanks for your email to Scott, he is not in the office this week so I am taking his emails, I am his manager, Frank. I would be happy to discuss the options with you if you have a moment to call me, my number and extension is below. I am on EST so I am in the office until around 4 PM your local time, 7 PM EST.

I wanted to also just mention, in your email it says you have some existing roof leaks you are looking to get repaired, and you asked how much would it be to get a policy and get your roof repaired - I just wanted to make sure I advise you that the policy you may purchase will only cover future issues, as the current issue you have with the roof has already occurred prior to having coverage, so any policy you get will not be able to cover an issue that is already existing, as the policy would cover only issues that occur during the time you have coverage. Its like any other insurance, lets say for example a car, if you don't have insurance and you get into an accident today, and then you call an insurance company tomorrow to buy a policy, that policy wouldn't cover the accident from the day before because you didn't have insurance when the issue occurred, so it would only cover future accidents that would happen while you are covered, just for example.. The same concept would apply for home insurance or home warranty. If you get a new policy with us there is a 30 day grace period before the coverage becomes active, and any issues occurring after the policy becomes effective will be covered, but nothing that is already existing such as the current leaks you have right now in your roof.

If you are still interested in a policy i can give you some significant discounts and include the roof option for free. Call me when you can, thanks.

--
Frank Anderson
Sales Manager
Secure Home Warranty
Tel: 1(888)-825-2621 Ext. 505
"Safe, Secure, Reliable."



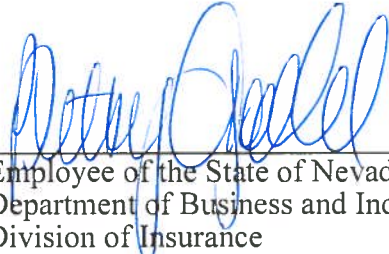
1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this date served the **ORDER TO CEASE AND DESIST,**
3 **CAUSE NO. 17.0149,** via electronic mail and by mailing a true and correct copy thereof,
4 properly addressed with postage prepaid, certified mail, return receipt requested, to the
5 following:

6 SECURE HOME WARRANTY
7 1735 Market St., Suite 3750
8 Philadelphia, PA 19103
9 EMAIL: info@securehomewarranty.com
10 CERTIFIED MAIL NO. 7016 2140 0000 7182 1727

11 FRANK ANDERSON, Sales Manager
12 SECURE HOME WARRANTY
13 1735 Market St., Suite 3750
14 Philadelphia, PA 19103
15 EMAIL: frank@securehomewarranty.com
16 CERTIFIED MAIL NO. 7016 2140 0000 7182 1734

17 DATED this 23rd day of June, 2017.

18 
19 _____
20 Employee of the State of Nevada
21 Department of Business and Industry
22 Division of Insurance
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