

BEFORE THE INSURANCE COMMISSIONER OF THE  
STATE OF ARKANSAS

IN THE MATTER OF:

AID NO. 2020- 62

HOLE IN WON LLC  
HOLE-IN-WON  
HOLE-IN-WON.COM  
HOLE-IN-WON.COM LLC  
HOLE-IN-WON.COM GOLF CONTEST INSURANCE COMPANY  
AMANDA PENROSE  
MARVYN MURDOCK  
JANICE WALLIS  
CHRISTIAN VALENZUELA  
DAVID KLEIN

RESPONDENTS

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CEASE AND DESIST ORDER

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Now, on this day, the matter of Hole-in-Won, LLC., Hole-in-Won, Hole-in-Won.com, Hole-in-Won.com, LLC., Hole-in-Won.com Golf Contest Insurance Company, Amanda Penrose, Marvyn Murdock, Janice Wallis, Christian Valenzuela, and David Klein ("Respondents"), is taken under consideration by Alan McClain, Insurance Commissioner for the State of Arkansas ("Commissioner"), with the Arkansas Insurance Department (the "Department") appearing through Gray Allen Turner, Associate Counsel, and from the facts, matters and other items before him, the Commissioner finds as follows:

1. In 2019, the Respondents solicited and sold fraudulent insurance policies to residents of Arkansas. The Respondents have engaged in the unauthorized transaction of insurance by falsely presenting themselves to be an authorized insurance company, soliciting consumers to purchase what deceptively appears to be contest insurance policies, fraudulently collecting payments for unauthorized insurance policies, and other acts constituting the transaction of insurance. Such transactions are in violation of the Arkansas Insurance Code, including Ark. Code Ann. §§ 23-65-101 & 23-66-206(8).
2. Under Ark. Code Ann. § 23-61-103(f)(1)(A), the Commissioner may summarily order a person or entity to cease and desist from an act or practice if there is reason to believe that a person or entity has not complied with Ark. Code Ann. § 23-65-101 or any other provision of the Arkansas Insurance Code.

## ORDER

The Commissioner finds that a public emergency exists for the issuance of an emergency order. The Commissioner hereby Orders the following:

1. Pursuant to Ark. Code Ann § 23-61-103(f)(1)(A), Respondents are hereby ordered to immediately cease and desist from the sale, solicitation, or consulting on anything concerning the sale of insurance in this state without a license, a violation of Ark. Code Ann. § 23-64-501.

2. Pursuant to Ark. Code Ann. §§ 23-61-103 and 23-64-501, the Respondents are given notice that upon written request within thirty days of the entry of this order, a hearing shall be held under Ark. Code Ann. § 23-61-301 to determine if the cease and desist order should continue. If no hearing is requested, the order shall remain in effect until it is modified or vacated by the commissioner, and shall be considered a final agency action.
3. Respondents are further ordered to produce at the Arkansas Insurance Department, within fifteen days of receipt of this Order, a complete listing of the names and addresses of all Arkansas consumers who have purchased any insurance policy or product, as well as provide a detailed accounting of the amount of premium collected by Respondents from the consumers, a complete listing of all of its books, records and accounts for examination by the Department.

IT IS SO ORDERED THIS 12<sup>th</sup> DAY OF OCTOBER, 2020

  
ALAN MCCLAIN  
INSURANCE COMMISSIONER  
STATE OF ARKANSAS