



**The State of New Hampshire  
Insurance Department**

21 South Fruit Street, Suite 14  
Concord, NH 03301

**David J. Bettencourt**  
Commissioner

**Keith E. Nyhan**  
Deputy Commissioner

February 29, 2024

VIA EMAIL: [TED.KENNEDY@COREBRIDGEFINANCIAL.COM](mailto:TED.KENNEDY@COREBRIDGEFINANCIAL.COM)

VIA FIRST-CLASS & CERTIFIED MAIL: 7011 2000 0001 8842 8305

American General Life Ins. Co.  
2727-A Allen Parkway, 3-D1  
Houston, TX 77019

Re: Order to Show Cause & Notice of Hearing, Docket No.: INS No. 24-012-EP

Dear American General Life Ins. Co.,

Enclosed please find an Order to Show Cause and Notice of Hearing issued by Commissioner D.J. Bettencourt.

A hearing in this matter has been scheduled on **April 18, 2024 at 1:30 PM** at the New Hampshire Insurance Department located at 21 South Fruit Street, Suite 14, Concord, NH. You may find driving directions and additional information on our website at <http://www.nh.gov/insurance>

Sincerely,

A handwritten signature in blue ink, appearing to read "Joshua S. Hilliard".

Joshua S. Hilliard, Esq.  
Compliance and Enforcement Counsel  
New Hampshire Insurance Department  
Telephone: (603) 271-2482  
Email: [joshua.s.hilliard@ins.nh.gov](mailto:joshua.s.hilliard@ins.nh.gov)

**STATE OF NEW HAMPSHIRE  
INSURANCE DEPARTMENT**

**In Re: American General Life Ins. Co.  
Docket No.: Ins. No. 24-012-EP**

**ORDER TO SHOW CAUSE  
AND  
NOTICE OF HEARING**

The New Hampshire Insurance Department ("NHID") orders American General Life Ins. Co. ("Respondent") to show cause why the New Hampshire Insurance Commissioner should not levy an administrative fine against it and/or suspend Respondent's certificate of authority to operate in this state. In support of the Order to Show Cause and pursuant to RSA 541-A:31, RSA 400-A:17 *et seq.* and Ins Chapter 200, the NHID states as follows:

**STATEMENT OF FACTS**

1. Respondent is a Texas based insurer with an address of 2727-A Allen Parkway, 3-D1 Houston, TX 77019, which is authorized to do business in New Hampshire.
2. On January 10, 2024, the NHID sent an e-mail to Respondent requesting information relevant to an ongoing investigation in which Respondent was not the subject of the investigation. Respondent did not respond to that request.
3. On January 30, 2024, the NHID sent a second e-mail to Respondent requesting information relevant to an ongoing investigation in which Respondent was not the subject of the investigation. Respondent responded that day, acknowledging the request and indicating it would provide an update by February 2, 2024.
4. Respondent did not provide an update by February 2, 2024. To date, Respondent has provided no information responsive to the earlier requests by the NHID.

**STATEMENT OF ISSUES**

5. Whether Respondent violated NH RSA 400-A:16, II by failing to respond within 10 working days to the NHID's January 10, 2024, request.
6. Whether Respondent violated NH RSA 400-A:16, II by failing to respond within 10 working days to the NHID's January 30, 2024, request.

7. The NHID reserves the right to amend this statement of issues upon reasonable notice to the Commissioner (or his designated Representative) and the Respondent.

#### **INSURANCE LAWS VIOLATED BY RESPONDENT**

8. The NHID maintains the Respondent violated the following New Hampshire insurance law statutes: NH RSA 400-A:16, II.
9. The NHID reserves the right to amend this list of insurance laws violated by the Respondent upon reasonable notice to the Commissioner (or his designated Representative) and the Respondent.

#### **PENALTY REQUESTED**

10. In the event that the Hearing Officer determines after an evidentiary hearing that the NHID sustained its burden of proof with respect to the allegations of fact and violations of law outlined above, the NHID requests that the Hearing Officer impose the following sanctions on the Respondent:
  - a. Order the Respondent to pay a penalty no less than \$5,000; and
  - b. Order that the Respondent's certificate of authority in this state be suspended.
11. The NHID reserves the right to amend penalty requested upon reasonable notice to the Commissioner (or his designated Representative) and the Respondent.

#### **NOTICE OF HEARING**

12. An adjudicatory proceeding shall be commenced for the purpose of resolving the issues articulated above pursuant to RSA 541-A:31, RSA 400-A:17, *et seq.*, and Ins 200. To the extent that the Department's rules do not address an issue of policy or procedures, the Department shall apply the N.H. Department of Justice Rules, Part 800.
13. The Respondent shall appear at Department on **April 18, 2024, at 1:30 PM** at the Department's office located at 21 South Fruit Street, Suite 14, in Concord New Hampshire to participate in this adjudicatory proceeding and, if deemed

appropriate, be subject to sanctions pursuant to RSA 400-A:15, III.  
Respondent's failure to appear at the time and place specified above may result in the hearing being held *in absentia* and sanctions may be imposed without further notice or an opportunity to be heard.

14. Emily Dougherty, Esq. is appointed to act as Hearing Officer in this matter with all the authority within the scope of RSA 400-A:19 and Ins 203.01.
15. Sandra Barlow shall serve as clerk to the Hearing Officer. The parties should direct all communications to Ms. Barlow, whose contact information is:

Sandra Barlow, Clerk  
New Hampshire Insurance Department  
21 South Fruit Street, Suite 14  
Concord, NH 03301  
Tel: (603) 271-2033  
Fax: (603)271-1406  
Email: [sandra.l.barlow@ins.nh.gov](mailto:sandra.l.barlow@ins.nh.gov)

16. The Respondent has the right to be represented by a lawyer in this proceeding. However, the Respondent shall bear the cost of retaining said lawyer. Should the Respondent elect to retain a lawyer, his lawyer shall file a Notice of Appearance with Ms. Barlow, and said lawyer should do so at the earliest possible date. A copy of the NHID's Notice of Appearance form is enclosed with this Order.
17. Any party may request a transcript of the proceeding. The party requesting a transcript of the proceedings shall file a written request for a certified court reporter with the Hearing Officer at least 10 days prior to the scheduled hearing date. The costs incurred for the services of a certified court reporter shall be borne by the requesting party.
18. Joshua Hilliard, Esq. shall serve as staff advocate representing the interests of the NHID.
19. All routine procedural inquiries may be made by contacting Sandra Barlow, Hearing Clerk, New Hampshire Insurance Department, 21 South Fruit Street, Suite 14, Concord NH 03301, (603) 271-2033, but that all other communications with the Hearing Officer and the Commissioner shall be in writing and filed as provided above. *Ex parte* communications are forbidden by statute and the Department's regulations.

20. A copy of this hearing notice shall be served upon Respondent by certified mail addressed to the mailing address on file with New Hampshire Insurance Department. *See*, RSA 400-A:14.

It is **SO ORDERED**.

NEW HAMPSHIRE INSURANCE DEPARTMENT

Date: 2/29/24

  
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David L. Bettencourt  
Insurance Commissioner

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing Order to Show Cause and Notice of Hearing was sent this date by first-class mail, postage prepaid, and by certified mail, return receipt requested to American General Life Ins. Co. at 2727-A Allen Parkway, 3-D1 Houston, TX 77019 and via e-mail to [TED.KENNEDY@COREBRIDGEFINANCIAL.COM](mailto:TED.KENNEDY@COREBRIDGEFINANCIAL.COM).

Date: 2/29/24

  
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Joshua S. Hilliard, Esq.  
Compliance & Enforcement Counsel