



BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF)	Division Case No. 118879
)	
ALESSANDRO C. MARSH,)	ORDER AND CONSENT TO ORDER
F/K/A SAMUEL CAMPBELL MARSH,)	
NPN 18865780,)	
DOB 04/05/XXXX,)	
)	
Respondent.)	

NOW THEREFORE, upon motion of the Iowa Insurance Division (“Division”) and by the consent of Respondent, Alessandro C. Marsh, pursuant to the provisions of Iowa Code chapter 522B—Licensing of Insurance Producers, the Commissioner enters the following Order and Consent to Order (“Consent Order”):

I. PARTIES AND JURISDICTION

1. The Commissioner of Insurance, Douglas M. Ommen, directly and through his designees, administers and enforces Iowa Code chapter 522B—Licensing of Insurance Producers pursuant to Iowa Code § 505.8.
2. Alessandro Cameron Marsh, formerly known as Samuel Campbell Marsh (“Marsh”) is an individual with a last-known residence address of 3031 Grand Ave., Billings, Montana 59102.
3. Marsh was licensed in the state of Iowa as a nonresident insurance producer from August 22, 2019, to July 18, 2023, when Marsh voluntarily surrendered his license. Marsh was licensed under National Producer Number 18865780.
4. Pursuant to Iowa Code § 522B.11(5), the Commissioner may enforce the provisions of Iowa Code chapters 507B and 522B “against any person who is under investigation for, or charged with, a violation of either chapter even if the person’s license has been surrendered or has lapsed by operation of law.”

5. Pursuant to Iowa Code § 505.28, Marsh consented to the jurisdiction of the Commissioner of Insurance by committing acts governed by chapter 522B.

6. From on or about August 22, 2019, to present, Marsh engaged in acts and practices within the state of Iowa constituting cause for probation, suspension, or revocation of Marsh's insurance producer license; cease and desist orders; and civil penalties or other relief under Iowa Code chapters 505, 507B, 522B, and rules adopted pursuant to these chapters.

II. FINDINGS OF FACT

7. Marsh applied for a nonresident insurance producer license with the Division by submitting a Uniform Application for Individual Producer License ("Uniform Application") through the National Insurance Producer Registry. In submitting the Uniform Application, Marsh designated the Commissioner as an agent for service of process.

8. The Division issued Marsh a license as a nonresident insurance producer on August 22, 2019, and assigned to Marsh National Producer Number 18865780.

Law Practice

9. Prior to obtaining licensure as an insurance producer, Marsh was licensed as an attorney in the state of Washington under his then-legal name, Samuel Campbell Marsh, bar license number 43756.

10. On August 21, 2017, the Washington Supreme Court entered an interim suspension of Marsh's law license pending the resolution of ongoing disciplinary proceedings. In those underlying disciplinary proceedings, the Washington Supreme Court found that Marsh engaged in incompetence in the practice of law and to have knowingly submitted forged documents to a tribunal.

11. On September 18, 2017, based on the Washington interim suspension, the United States Board of Immigration Appeals suspended Marsh's ability to practice law before the Board, the Federal Immigration Courts, and the Department of Homeland Security.

12. On October 13, 2017, the United States Court of Appeals for the Ninth Circuit suspended Marsh from practicing before that court for one year due to Marsh improperly handling numerous immigration cases.

13. On February 15, 2018, the District Court for Clark County, Nevada, entered an Order for Change of Name on the Petition of Samuel Campbell Marsh. The order identified an individual born in Ukiah, California, with a birthdate of 4/5/XXXX, and ordered that his name be changed from Samuel Campbell Marsh to Alessandro Cameron Marsh. Marsh's Division licensing records list his birthdate as 4/5/XXXX.

14. On October 2, 2018, due to the Ninth Circuit's suspension, the Washington Supreme Court entered reciprocal disciplinary action and suspended Marsh's Washington law license for one year.

15. On February 1, 2019, following the conclusion of the state disciplinary proceedings, the Washington Supreme Court disbarred Marsh.

16. On May 10, 2019, based on the Washington disbarment, the United States Board of Immigration Appeals entered a final disciplinary order disbaring Marsh from practicing law before the Board, the Federal Immigration Courts, and the Department of Homeland Security.

Insurance Practice

17. On August 22, 2019, Marsh applied for and was issued a non-resident insurance producer license with the Division listing Utah as his resident state. On the application, Marsh answered "No" to the following question:

2. Have you ever been named or involved as a party in an administrative proceeding, including FINRA action or arbitration proceeding regarding any professional or occupational license or registration? “Involved” means having a license censured, suspended, revoked, canceled, terminated; or, being assessed a fine, a cease and desist order, a prohibition order, a compliance order, placed on probation, sanctioned or surrendering a license to resolve an administrative action. “Involved” also means being named as a party to an administrative or arbitration proceeding, which is related to a professional or occupational license, or registration.

Marsh did not report any of the administrative actions taken against his law license or bar admittances identified in Paragraphs 9–16 above.

18. In completing the application, Marsh attested, under penalty of perjury, that “all of the information submitted in [the] application . . . is true and complete.” Marsh further attested that he was “aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject [him] to civil or criminal penalties.”

19. On May 24, 2023, the Utah Insurance Department revoked Marsh’s resident insurance producer license. The Utah Insurance Department found, among other things, that Marsh had a professional or occupational license subject to discipline; used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility while engaging in the business of insurance; failed to submit accurate and complete information to the Utah commissioner; provided information on his application that was incorrect, misleading, incomplete, or materially untrue; and obtained or attempted to obtain a license through misrepresentation or fraud.

20. On June 15, 2023, Marsh submitted to the Division a request to change his residence and business address and change his Iowa nonresident producer license to a resident producer license. Marsh indicated that his new residence and business address was located at 800 4th

Ave., Unit 5071, Grinnell, Iowa 50112. The Division processed the application, and Marsh's addresses and home state designation were changed.

21. Following this change, the Division became aware of the Utah revocation. A Division investigator contacted the owner of the apartment building located at the Grinnell address, who confirmed that Marsh did not reside at that address and, further, that no unit 5071 existed. The Division requested that Marsh provide proof of his Iowa residence by July 28, 2023.

22. In response, on July 12, 2023, Marsh informed the Division that he would not be moving to Iowa and was instead seeking a resident license in Montana. Marsh requested that his Iowa resident license be converted back to a nonresident license. Because Marsh had yet to receive a resident license in Montana and no longer had a home state resident license in Utah, the Division informed Marsh that he would need to surrender his Iowa license and reapply for a nonresident license once he had established a resident state license elsewhere. Marsh subsequently surrendered his Iowa license effective July 18, 2023.

23. On August 9, 2023, the Idaho Department of Insurance entered as summary order revoking Marsh's Idaho nonresident producer license based on the Utah revocation.

24. On September 20, 2023, the California Insurance Commissioner entered a summary order revoking Marsh's California nonresident producer license based on the Utah revocation and the Washington revocation of Marsh's law license.

III. CONCLUSIONS OF LAW

COUNT I

Obtaining a License Through Misrepresentation or Fraud

25. Under Iowa Code § 522B.11(1)(c), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for obtaining or attempting to obtain a license through misrepresentation or fraud.

26. In his application for licensure as an insurance producer in Iowa, Marsh failed to disclose the suspensions and revocation of his Washington law license, the suspension of his admittance to practice before the United States Court of Appeals for the Ninth Circuit, and his suspension and disbarment from the United States Board of Immigration Appeals, the Federal Immigration Courts, and the Department of Homeland Security.

27. Marsh engaged in misrepresentation and/or fraud by failing to disclose these administrative actions against his law licenses and bar admittances on his application for a nonresident Iowa insurance producer license.

28. On Marsh's application for resident licensure in Iowa, Marsh provided an Iowa resident and business address located in Grinnell, Iowa. Marsh did not live at this address, and further investigation revealed the address did not exist.

29. Marsh further engaged in misrepresentation and/or fraud in attempting to obtain a resident Iowa producer license by providing a false business and resident address on his application.

30. Marsh's acts and practices violated Iowa Code § 522B.11(1)(c) subjecting Marsh to probation, suspension, or revocation of Marsh's insurance producer license, the imposition of a civil penalty, an order requiring Marsh to cease and desist from engaging in such acts or practices, an order of restitution, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT II
Other State Licensing Action

31. Under Iowa Code § 522B.11(1)(i), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for having an

insurance producer license, or its equivalent, denied, suspended, or revoked in any other state, province, district, or territory.

32. On May 24, 2023, the Utah Insurance Department revoked Marsh's Utah insurance producer license. On August 9, 2023, the Idaho Department of Insurance revoked Marsh's Idaho producer license. On September 20, 2023, the California Insurance Commissioner revoked Marsh's California producer license.

33. Marsh's acts and practices violate Iowa Code § 522B.11(1)(i) subjecting Marsh to probation, suspension, or revocation of Marsh's Iowa insurance producer license, the imposition of a civil penalty, an order requiring Marsh to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

IV. ORDER

WHEREFORE, IT IS ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code chapter 522B:

- A. Marsh's Iowa nonresident insurance producer license is permanently revoked and Respondent is permanently prohibited from engaging in the business of insurance in this state pursuant to Iowa Code §§ 522B.11 and 522B.17;
- B. Marsh, pursuant to Iowa Code § 522B.17, shall immediately cease and desist from engaging in the business of insurance in this state;
- C. These orders may be enforced under Iowa Code chapter 522B, including but not limited to Iowa Code § 522B.17(3).

SO ORDERED on this 11th day of January, 2024.

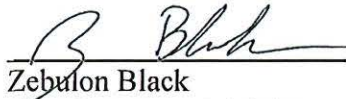


DOUGLAS M. OMMEN
Iowa Insurance Commissioner

Respectfully submitted,



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ATTORNEY FOR THE DIVISION



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ATTORNEY FOR THE DIVISION

Copy to:

Alessandro Cameron Marsh
3031 Grand Ave.
Billings, Montana 59102
RESPONDENT

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause, or their attorney, at their respective addresses disclosed on the pleadings on January 11, 2024.

By: First Class Mail Personal Service
 Restricted certified mail, return receipt Email
 Certified mail, return receipt _____

Signature: Brooke Hohn
Brooke Hohn

NOTICE OF PENALTIES FOR WILLFUL VIOLATION OF THIS ORDER

YOU ARE NOTIFIED that acting as an insurance producer, as defined in Iowa Code chapter 522B, in violation of this Order, is a felony under Iowa Code § 507A.10, subjecting you to punishment of imprisonment, jail, fines, or any combination of custody and fines.

YOU ARE ALSO NOTIFIED that if you violate this Order, you may be subject to administrative and civil penalties pursuant to Iowa Code § 522B.17(3). The Commissioner may petition the district court to hold a hearing to enforce the order as certified by the Commissioner. The district court may assess a civil penalty against you in an amount not less than three thousand dollars but not greater than ten thousand dollars for each violation and may issue further orders as it deems appropriate.

NOTICE OF FINAL ORDER IMPACT

A final order of revocation or a cease and desist order may adversely affect other existing business or professional licenses and may result in license revocation or disciplinary action.

A final order in an administrative action does not resolve any potential criminal or civil violations or causes of action that might arise from the same or similar conduct that is the subject of this this order. It may result in criminal law enforcement authorities, including the fraud bureau of the Iowa Insurance Division, pursuing a criminal investigation or prosecution of potential criminal law violations.

CONSENT TO ORDER AND AGREEMENT

I, Alessandro Cameron Marsh, Respondent in this matter, have read, understood, and do knowingly consent to this Order in its entirety. I understand and acknowledge I have the right to consult with an attorney on this matter if I choose to do so, and I acknowledge that the Division cannot provide me an attorney nor can the Division provide me legal advice. By executing this Consent, I understand that I am waiving my rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review.

I further understand this Order is considered a final administrative action that will be reported by the Division to the National Association of Insurance Commissioners and to other regulatory agencies. I also understand this Order is a public record under Iowa Code chapter 22, and information may be shared with other regulatory authorities or governmental agencies pursuant to Iowa Code § 505.8(8)(d). I also understand this Order will be posted to the Division's website and a notation will be made to the publicly available website record that administrative action has been taken against me.

01/09/2024
Date


Alessandro Cameron Marsh, Respondent

3031 GRAND AVE., BILLINGS, MT. 59102
Address of Signatory

STATE OF FLORIDA
COUNTY OF MIAMI-DADE

Subscribed and sworn before me by Alessandro Marsh on this 9th day of January, 2024.

This notarial act was an online notarization



Shonsuree Davila
Notary Public for the State of FLORIDA
Shonsuree Davila

Signer Alessandro Marsh produced a Washington Drivers License, as identification along with multi-factor KBA authentication and audio/video recording to be notarized online.