

No. 2025-9296

**Official Order  
of the  
Texas Commissioner of Insurance**

**Date: 05-14-2025**

**Subject Considered:**

Enhance Health LLC  
3111 N University Dr Ste 608  
Coral Springs, Florida 33065-5060

Consent Order  
TDI Enforcement File No. 34506

**General remarks and official action taken:**

This is a consent order with Enhance Health LLC (Enhance). Multiple agents from Enhance submitted applications through the federal Affordable Care Act Health Insurance Marketplace without the insured's knowledge or consent. Enhance has agreed to an administrative penalty of \$35,000.

**Waiver**

Enhance acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Enhance waives all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

**Findings of Fact**

1. Enhance holds a non-resident general lines agency license with life, accident, health, and HMO qualification issued by the Texas Department of Insurance (TDI) on October 15, 2021.

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2. TDI received referrals from the Centers for Medicaid and Medicare Services (CMS) for unauthorized enrollments and changes to health insurance plans through the federal Affordable Care Act Health Insurance Marketplace submitted by several agents for Enhance.
3. TDI's investigation confirmed that multiple agents from Enhance submitted health insurance applications through the federal Affordable Care Act Health Insurance Marketplace without the consent or knowledge of insureds.
4. Enhance utilized a platform where selling agents were allowed to place sales using the National Producer Number (NPN) of an agent of record that was different from the selling agent, which is permitted by CMS.
5. Enhance was employing a practice which permitted these agents to submit open-ended authorizations to renew and re-enroll consumers.
6. Enhance has discontinued the use of the NPN override to ensure the agent of record is the selling agent and has ceased the practice of obtaining open-ended authorizations from consumers. Enhance represents that it believed this practice was permitted by state and federal regulations.
7. Enhance represents that it has implemented new policies and procedures to ensure all policies submitted are authorized by the consumer.
8. TDI is not currently aware of any direct consumer harm.

### **Conclusions of Law**

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, and 4054.051.
2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056; TEX. INS. CODE §§ 36.104 and 82.055; and 28 TEX. ADMIN. CODE § 1.47.
3. Enhance has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.

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- Enhance engaged in a trade practice defined as an unfair method of competition or an unfair or deceptive act or practice in the business of insurance, as contemplated in TEX. INS. CODE Ch. 541, Subchapter B and 28 TEX. ADMIN. CODE § 21.3, by engaging in those activities specified in TEX. INS. CODE § 541.051.

## Order

It is ordered that Enhance Health LLC pay an administrative penalty of \$35,000 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which TDI will send after entry of this order.

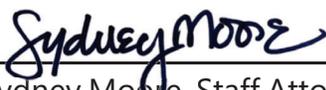
Signed by:  
  
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Cassie Brown  
Commissioner of Insurance

Recommended and reviewed by:

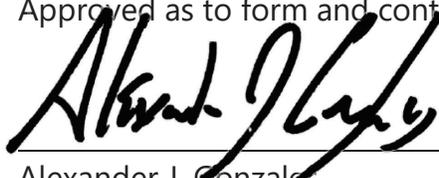


Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division



Sydney Moore, Staff Attorney  
Enforcement

Approved as to form and content:



Alexander J. Gonzalez  
Attorney for Enhance Health LLC

Affidavit

STATE OF Florida §

§

COUNTY OF Pinellas §

Before me, the undersigned authority, personally appeared Gary Jenkins, who being by me duly sworn, deposed as follows:

"My name is Gary Jenkins. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

I hold the office of Chief Executive Officer and am the authorized representative of Enhance Health LLC. I am duly authorized by said organization to execute this statement.

Enhance Health LLC has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

Gary Jenkins

Affiant

SWORN TO AND SUBSCRIBED before me on April 16, 2025.

(NOTARY SEAL)



Erika Vrakas  
Signature of Notary Public

Erika Vrakas  
Printed Name of Notary Public