

**STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER**

*In the Matter of*

**EPIK HOLDINGS, INC., EPIK, INC.,  
DNPROTECT, and ROB MONSTER,**

Respondents.

Order No. 22-0671

WAOIC No. N/A  
FEIN N/A

CONSENT ORDER RESCINDING  
ORDER TO CEASE AND DESIST NO.  
22-0240 AND LEVYING A FINE

This Consent Order Rescinding Order to Cease and Desist No. 22-0240 and Levying a Fine (“Order”) is entered into by the Insurance Commissioner of the state of Washington (“Insurance Commissioner”), acting pursuant to the authority set forth in RCW 48.02.060, RCW 48.15.023, RCW 48.17.063, and Epik Holdings, Inc., Epik, Inc., DNProtect, and Rob Monster. This Order is a public record and will be disseminated pursuant to Title 48 RCW and the Insurance Commissioner’s policies and procedures.

**BASIS:**

1. Epik Holdings, Inc. (“Epik Holdings) (UBI No. 602 976 304) was formed in Washington State. It is principally located in Washington State.
2. Epik, Inc. (“Epik”) (UBI No. 602 401 092) was formed in Washington State. It is principally located in Washington State.
3. DNProtect (“DNP”) was formed in Washington. It is principally located in Washington State.
4. Rob Monster (“Monster”) is the registered agent and sole governor of Epik and Epik Holdings. Monster is principally located in Sammamish, Washington with a Bellevue, Washington mailing address.
5. Epik Holdings, Epik, and DNP are collectively referred to herein as “the Companies.” EPIC Holdings, Epik, DNP, and Monster are collectively referred to herein as “the Respondents.”

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6. The Respondents do not hold a certificate of authority authorizing them to transact insurance in Washington and do not hold insurance producer licenses authorizing them to sell, solicit, or negotiate insurance in Washington.

7. The Insurance Commissioner (“OIC”) opened an investigation after receiving a complaint on December 10, 2020, alleging the Respondents were offering insurance coverage to Washington consumers without a certificate of authority. The complaint provided information about Epik, its services, and DNP.

8. Epik and Epik Holdings hold the same physical address. Epik offers domain name registration services. As part of that service, Epik offers a “risk management service” called DNProtect ([www.dnprotect.com](http://www.dnprotect.com)) which provides a risk scoring mechanism whereby consumers can check the risk of their domain name being lost for various reasons. This service is provided by DNP. Epik describes the service as ownership coverage, risk management, or a warranty. The ownership coverage protects against legal action, trademark claim or dispute, theft, and clerical errors (domain name registration). The premium cost is related to the DNProtect score, as well as the amount of coverage provided. The DNProtect website also offers a commission for every domain name referred that ends up being protected “by our domain name insurance”.

9. The complaint also included a copy of a discussion thread that took place in 2019 on the online web forum, Namepros.com (“Forum”). In the Forum, Monster and other participants, some identified as “Epik Staff”, discuss the “must have” features for DNProtect, the lack of available insurance, the need for underwriting the requirements of DNProtect, acquiring an existing insurance agency, and developing relationships with reinsurers for catastrophic loss.

10. Additionally, the Forum discussed what the DNProtect insurance should entail, requirements for licensing, Monster’s prior experience in the insurance industry, and reinsurance requirements.

11. The OIC review of the website [www.dnprotect.com](http://www.dnprotect.com) revealed the following:

- DNProtect is described as the Internet’s leading risk management service and offers “Domain Ownership Coverage” protecting the domain from legal, theft, and clerical error loss. The webpage includes a premium calculator for the coverage.
- In DNProtect’s policy terms and conditions, they describe a warranty for internet domain names to business and individuals who own those names.

- In the sample domain name ownership coverage policy, it describes a “warranty agreement” for “reimbursement of services associated with the recovery or update of ownership of a domain name.”
- “DNProtect provides protection for the domain name described in the policy in consideration of the payment of a premium.”
- DNProtect offers an affiliate program that pays a commission for each referral that “ends up being protected by our domain name insurance.”
- DNP identifies Epik Holdings to be the underwriter for the policy.

12. On May 10, 2021, the OIC sent a Notice of Investigation (“NOI”) to the Companies and received no response. On July 26, 2021, the OIC contacted DNP via telephone and was provided Monster’s direct email address. A second email, which included the original NOI was e

13. The OIC found that the Respondents offered insurance coverage to Washington consumers without a certificate of authority, or an insurance producer license issued by the Insurance Commissioner. Mainly, the insurance is to cover the loss of internet domain names due to theft or legal disputes.

14. Epik Holdings is the obligor for insurance offering protection of website domain names.

15. Epik markets the insurance to consumers through the website, [www.DNProtect.com](http://www.DNProtect.com).

16. On April 15, 2022, the OIC issued an Order to Cease and Desist and Imposing Fine No. 22-0240 (“Order No. 22-0240”) against the Respondents, ordering the them to immediately cease from 1) engaging in or transacting the unauthorized business of insurance in the state of Washington, 2) seeking, pursuing, or obtaining any insurance or service contract business in the state of Washington, and 3) soliciting Washington residents to induce them to purchase any travel insurance contract. Order No. 22-0240 also imposed a fine of \$50,000.

17. On July 13, 2022, the Respondents demanded a hearing contesting Order No. 22-0240.

18. In November 2022, DNP notified to the OIC that it did not sell policies to any Washington consumers. Additionally, it stated it is not offering the product to Washington consumers.

19. During OIC's investigation of Respondents, DNP website added a message stating that "the Service is not available for residents of Washington."

20. RCW 48.01.040 states insurance is a contract whereby one undertakes to indemnify another or pay a specified amount upon determinable contingencies.

21. RCW 48.01.050 defines "insurer" as including "every person engaged in the business of making contracts of insurance.

22. RCW 48.01.060 states that "Insurance transaction" includes any: (1) Solicitation; (2) Negotiations preliminary to execution; (3) Execution of an insurance contract; (4) Transactions of matters subsequent to execution of the contract and arising out of it; (5) Insuring.

23. RCW 48.01.070 defines "Person" as any individual, company, insurer, association, organization, reciprocal or interinsurance exchange, partnership, business trust, or corporation

24. RCW 48.05.030(1) states no person shall act as an insurer and no insurer shall transact insurance in this state other than as authorized by a certificate of authority issued to it by the Insurance Commissioner and then in force; except, as to such transactions as are expressly otherwise provided for in this code.

25. RCW 48.15.020(1) states an insurer that is not authorized by the Insurance Commissioner may not solicit insurance business in this state or transact insurance business in this state, except as provided in this chapter.

26. RCW 48.15.020(2)(a) states a person may not, in this state, represent an unauthorized insurer except as provided in this chapter.

27. RCW 48.17.010(12) defines "Person" as an individual or a business entity.

28. RCW 48.17.010(14) states "Solicit" means attempting to sell insurance or asking or urging a person to apply for a particular kind of insurance from a particular insurer

29. RCW 48.15.023(5)(a) provides if the Insurance Commissioner has cause to believe that any person has violated the provisions of RCW 48.15.020(1), the Insurance Commissioner may issue and enforce a cease and desist order in accordance with the provisions of RCW 48.02.080; and/or assess a civil penalty of not more than twenty-five thousand dollars for each violation, after providing notice and an opportunity for a hearing in accordance with chapters 34.05 and 48.04 RCW.

30. RCW 48.17.060(1) states a person shall not sell, solicit, or negotiate insurance in this state for any line or lines of insurance unless the person is licensed for that line of authority in accordance with this chapter.

31. RCW 48.15.023(5)(a)(ii) provides if the Insurance Commissioner has cause to believe that any person has violated the provisions of RCW 48.15.020(1), the commissioner may assess a civil penalty of not more than twenty-five thousand dollars for each violation, after providing notice and an opportunity for a hearing in accordance with chapters 34.05 and 48.04 RCW.

32. RCW 48.17.063(4)(a)(iii) provides if the Insurance Commissioner has cause to believe that any person has violated the provisions of RCW 48.17.060, the commissioner may: Assess a civil penalty of not more than twenty-five thousand dollars for each violation, after providing notice and an opportunity for a hearing in accordance with chapters 34.05 and 48.04 RCW.

33. The Respondents' actions described herein violate RCW 48.05.030(1), RCW 48.15.020(1), and RCW 48.17.060(1), justifying the imposition of a fine pursuant under RCW 48.15.023(5)(a)(ii) and RCW 48.17.063(4)(a)(iii).

**CONSENT TO ORDER:**

The Insurance Commissioner of the state of Washington and Respondents agree the best interest of the public will be served by entering into this Order. NOW THEREFORE, the Respondents consents to the following in consideration of its desire to resolve this matter without further administrative or judicial proceedings. The Insurance Commissioner consents to settle the matter in consideration of Respondents' payment of a fine, and upon such terms and conditions as are set forth below:

1. Respondents acknowledge their duty to comply fully with the applicable laws of the state of Washington.
2. Respondents consent to the entry of this Order, waive any and all hearing rights, and further administrative or judicial challenges to this Order.
3. Respondents agree that no DNP policies will be sold in the state of Washington, and they will not solicit or transact insurance business in the state of Washington unless they comply with

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the laws of the state of Washington and obtain the proper authorization and licensure from the Insurance Commissioner.

4. In order to consent to the entry of this Order, Respondents must sign and return this Order in a manner acceptable to the Insurance Commissioner by **January 23, 2023**, unless the Insurance Commissioner grants a new deadline in writing.

5. By agreement of the parties, the Insurance Commissioner will impose a fine of Ten Thousand Dollars (\$10,000.00), to be paid within thirty (30) days of the execution of this Order.

6. Upon execution of this Order and payment of the fine, the Insurance Commissioner will rescind Order No. 22-0240 and only this Order will remain in effect.

7. Respondents' failure to timely pay the fine within 30 days of the execution of this Order shall result in Order No. 22-0240 remaining in effect and may also result in recovery of the fine through a civil action brought on behalf of the Insurance Commissioner by the Attorney General of the state of Washington.

8. By agreement of the parties, Respondents hereby withdraw the Demand for Hearing in this matter, OAH Docket No. 07-2022-INS-00330. The parties respectfully request the proceedings in this matter be terminated in accordance with this Order.

9. Respondents understand and agree that any further failure to comply with the statutes that are the subject of this Order constitute grounds for further penalties, which may be imposed in direct response to further violations.

10. This Order and the violations set forth herein constitute admissible evidence that may be considered in any future action by the Insurance Commissioner involving Respondents. However, the facts of this Order, and any provision, finding or conclusion contained herein does not, and is not intended to, determine any factual or legal issue, or have any preclusive or collateral estoppel effects in any lawsuit by any party other than the Insurance Commissioner.

EXECUTED this 18 day of Jan 2023.

By: Epik Holdings, Inc.  
Brian Royce  
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Printed Name: Brian Royce

Printed Corporate Title: CEO

By:  Epik Inc  
DocuSigned by:  
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Printed Name: Brian Royce

Printed Corporate Title: CEO

By:  DNProtect  
DocuSigned by:  
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Printed Name: Brian Royce

Printed Corporate Title: CEO

By:  Rob Monster  
DocuSigned by:  
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Printed Name: Robert Monster

Printed Corporate Title: chairman

**AGREED ORDER:**

Pursuant to the foregoing factual Basis and Consent to Order, the Insurance Commissioner of the state of Washington hereby Orders as follows:

1. Respondents shall pay a fine in the amount of Ten Thousand Dollars (\$10,000.00) within 30 days of the execution of this Order.

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2. Upon payment of the fine, Order No. 22-0240 shall be thereby rescinded, without further action by the Insurance Commissioner, and only this Order shall remain in effect.

3. Respondents agree that no DNP policies will be sold in the state of Washington, and they will not solicit or transact insurance business in the state of Washington unless they comply with the laws of the state of Washington and obtain the proper authorization and licensure from the Insurance Commissioner.

4. The Companies and Monster’s failure to timely pay the fine within 30 days of the execution of this Order shall result in Order No. 22-0240 remaining in effect and may also result in recovery of the fine through a civil action brought on behalf of the Insurance Commissioner by the Attorney General of the state of Washington.

5. Respondents hereby withdraw the Demand for Hearing in this matter, OAH Docket No. 07-2022-INS-00330. The parties respectfully request the proceedings in this matter be terminated in accordance with this Order.


6. This Order and the violations set forth herein constitute admissible evidence that may be considered in any future action by the Insurance Commissioner involving Respondents. However, the facts of this Order, and any provision, finding or conclusion contained herein does not, and is not intended to, determine any factual or legal issue, or have any preclusive or collateral estoppel effects in any lawsuit by any party other than the Insurance Commissioner.

Entered at Tumwater, Washington, this \_\_\_\_\_ day of 1/19/2023 | 1:12 PM PST 2023.



MIKE KREIDLER  
Insurance Commissioner

By and through his designee

DocuSigned by:  
  
2C90223F541341D  
SANDRA MENDEZ  
Insurance Enforcement Specialist  
Legal Affairs Division

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