



**State of Tennessee
Department of State**

Administrative Procedures Division
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Nashville, Tennessee 37243-1102
Phone: (615) 741-7008/Fax: (615) 741-4472

June 6, 2018

Commissioner Julie Mix McPeak
Tennessee Department of Commerce &
Insurance
Office of Legal Counsel
12th Floor, Davy Crockett Tower
500 James Robertson Parkway
Nashville, Tennessee 37243-5065

Chase Carmen Hunter
545 Glendale Road
Hampden, MA 01036

Chase Carmen Hunter
340 South Lemon Avenue, #9039
Walnut, CA 91789-2706

Jesse D. Joseph, Esq.
Assistant General Counsel-Litigation
Tennessee Department of Commerce and
Insurance
Office of Legal Counsel
8th Floor, Davy Crockett Tower
500 James Robertson Parkway
Nashville, TN 37243-0569

RE: In the Matter of: Chase Carmen Hunter

Docket No. 12.04-150052J

Enclosed is an Initial Order rendered in connection with the above-styled case.

Administrative Procedures Division
Tennessee Department of State

/aem
Enclosure

RECEIVED

JUN 08 2018

**DEPT. OF COMMERCE AND INSURANCE
LEGAL OFFICE**

**BEFORE THE COMMISSIONER OF THE TENNESSEE
DEPARTMENT OF COMMERCE AND INSURANCE**

IN THE MATTER OF:

CHASE CARMEN HUNTER

DOCKET NO. 12.04-150052J

NOTICE

ATTACHED IS AN INITIAL ORDER RENDERED BY AN ADMINISTRATIVE JUDGE WITH THE ADMINISTRATIVE PROCEDURES DIVISION.

THE INITIAL ORDER IS NOT A FINAL ORDER BUT SHALL BECOME A FINAL ORDER UNLESS:

1. THE ENROLLEE FILES A WRITTEN APPEAL, OR EITHER PARTY FILES A PETITION FOR RECONSIDERATION WITH THE ADMINISTRATIVE PROCEDURES DIVISION NO LATER THAN **June 21, 2018**.

YOU MUST FILE THE APPEAL, PETITION FOR RECONSIDERATION WITH THE ADMINISTRATIVE PROCEDURES DIVISION. THE ADDRESS OF THE ADMINISTRATIVE PROCEDURES DIVISION IS:

SECRETARY OF STATE
ADMINISTRATIVE PROCEDURES DIVISION
WILLIAM R. SNODGRASS TOWER
312 ROSA PARKS AVENUE, 8th FLOOR
NASHVILLE, TENNESSEE 37243-1102

IF YOU HAVE ANY FURTHER QUESTIONS, PLEASE CALL THE ADMINISTRATIVE PROCEDURES DIVISION, **615/741-7008 OR 741-5042, FAX 615/741-4472**. PLEASE CONSULT APPENDIX A AFFIXED TO THE INITIAL ORDER FOR NOTICE OF APPEAL PROCEDURES.

BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE
OF THE STATE OF TENNESSEE

IN THE MATTER OF:

TENNESSEE INSURANCE
DIVISION,

Petitioner,

vs.

CHASE CARMEN HUNTER,

Respondent.

DOCKET NO. 12.04-150052J

TID NO. 17-118

INITIAL ORDER

This matter was heard on February 27, 2018, in Nashville, Tennessee, before Administrative Judge Elizabeth D. Cambron, assigned by the Secretary of State, Administrative Procedures Division (“APD”), to sit for the Commissioner of the Tennessee Department of Commerce and Insurance. The February 27, 2018, hearing addressed the allegations contained in the NOTICE OF HEARING AND CHARGES filed on January 17, 2018, and in the AMENDED NOTICE OF HEARING AND CHARGES filed on January 19, 2018, pertaining to Respondent Chase Carmen Hunter. Jesse D. Joseph, Assistant General Counsel, represented the Petitioner, the Tennessee Insurance Division (“Division”). The Respondent, Chase Carmen Hunter, was not present nor was an attorney present on her behalf.

After consideration of the RECORD in this matter, it is **ORDERED** that the Tennessee nonresident insurance producer license (No. 0899154) of the Respondent Chase Carmen Hunter is **REVOKED** and that the Respondent Chase Carmen Hunter is assessed **CIVIL PENALTIES** in the total amount of nine thousand dollars for violations of TENN. CODE ANN. §§ 56-6-112(a)(2), (a)(3), (a)(9), & 56-6-119(a).

NOTICE OF DEFAULT

Pursuant to TENN. CODE ANN. § 4-5-307, the Petitioner filed and served a NOTICE OF HEARING AND CHARGES against Respondent on January 17, 2018, setting this matter for hearing on February 27, 2018. On January 19, 2018, the Petitioner filed and served an AMENDED NOTICE OF HEARING AND CHARGES against Respondent. The Respondent did not appear for the hearing. On February 16, 2018, the Petitioner filed a MOTION TO DEEM SERVICE OF PROCESS COMPLETE AND SUFFICIENT, and at the hearing, the Petitioner moved for a default against the Respondent pursuant to TENN. CODE ANN. § 4-5-309, based on the following exhibits admitted into evidence:

1. a copy of the February 2, 2018, affidavit of Kimberly Biggs, which reflects that the Respondent's current residential and mailing addresses listed with the Division are 545 Glendale Road, Hampden, MA 01036, and 340 S. Lemon Ave., # 9039, Walnut, CA 91789-2706, respectively. Moreover, Ms. Biggs' affidavit indicated that, to date, the Respondent has not reported to the Division's Agent Licensing Section any change of address from the above addresses in Hampden, Massachusetts, and Walnut, California. (HRG. EX. 3);
2. a copy of the certified mail return receipt card signed by Drew Phillips as Respondent's "Agent" at the Walnut, California address on January 26, 2018 for Certified Mail No. 7017 0660 0000 3609 9608 (enclosing the service copy of January 19, 2018 AMENDED NOTICE OF HEARING AND CHARGES) (HRG. EX. 1); and
3. a copy of the certified mail return receipt card signed by Drew Phillips as Respondent's "Agent" at the Walnut, California address on February 12, 2018 for Certified Mail No. 7017 03530 0000 6745 6869 (enclosing the Petitioner's TENN. CODE ANN. § 4-5-313 Notice of Intent to Introduce affidavit of Ms. Biggs sent on February 7, 2018) (HRG. EX. 2).

Based on the affidavit of Ms. Biggs (HRG. EX. 3), the Respondent's address information on record with the Division, the Petitioner's properly addressed certified return receipt mail to Respondent's listed addresses, each enclosing a copy of the AMENDED NOTICE OF HEARING AND CHARGES dated January 19, 2018, and the

Petitioner's properly addressed certified return receipt mail to Respondent's listed addresses, each enclosing a copy of the Petitioner's TENN. CODE ANN. § 4-5-313 Notice of Intent to Introduce affidavit of Ms. Biggs dated February 7, 2018, the certified mail return receipt cards signed by Drew Phillips as Respondent's "Agent" at the Walnut, California listed address as to both of these service attempts, and the provisions of TENN. CODE ANN. §§ 56-6-107(g), and 56-6-112(f), the Court concludes that the Petitioner has taken the necessary steps as are deemed reasonable and required under the law in its attempt to serve Respondent and to obtain her signature acknowledging service of the AMENDED NOTICE OF HEARING AND CHARGES.

The Petitioner has served the Respondent by certified mail as set forth above at her listed addresses of record in the files of the Division in accordance with TENN. CODE ANN. § 56-6-112(f), even though there has been no return receipt personally signed by the Respondent as to this service. Since the Department has a statute that allows service by certified mail without specifying the necessity for a return receipt (TENN. CODE ANN. § 56-6-112(f)), and a statute that requires the licensee to keep his or her address information current (TENN. CODE ANN. § 56-6-107(g)), pursuant to TENN. COMP. R. & REGS. 1360-04-01-.06(3), the service of the AMENDED NOTICE OF HEARING AND CHARGES was complete upon placing the AMENDED NOTICE OF HEARING AND CHARGES in the mail on January 19, 2018, in the manner specified in the statute. The Tennessee Court of Appeals reached this same result in *William Wyttenbach v. Board of Tennessee Medical Examiners, et al.*, 2016 WL 1045668, No. M2014-02024-COA-R3-CV (Tenn. Ct. App. March 15, 2016), where service was considered sufficient by certified mail even without a signed return receipt by the Respondent.

It is determined that service of the AMENDED NOTICE OF HEARING AND CHARGES by certified mail return receipt requested, signed as received by Respondent's agent on January 26, 2018, was legally sufficient in accordance with TENN. CODE ANN. §§ 4-5-307 and 56-6-112(f), and TENN. COMP. R. & REGS. 1360-04-01-.06. Based on the failure of the Respondent to appear for the February 27, 2018 hearing, pursuant to TENN. CODE ANN. § 4-5-309 and Tenn. Code Ann. § 4-5-309 and TENN. COMP. R. & REGS. 1360-04-01-.15, the Respondent was held in default. Pursuant to TENN. COMP. R. & REGS. 1360-04-01-.15(2)(b), the hearing was conducted as an uncontested proceeding.

FINDINGS OF FACT

1. The Tennessee Insurance Law contained within Title 56 of TENN. CODE ANN., specifically TENN. CODE ANN. §§ 56-1-202 and 56-6-112 (the "Law"), places the responsibility of administering the Law on the Commissioner of the Tennessee Department of Commerce and Insurance ("Commissioner"). The Division is the lawful agent through which the Commissioner discharges this responsibility.

2. Chase Carmen Hunter ("Respondent") is a licensee of the Division who is responsible for being compliant with the insurance laws and regulations of the State of Tennessee. Respondent held a Tennessee nonresident insurance producer license, number 0899154, which became active on October 23, 2003, and expired on October 31, 2017. Respondent also held a Massachusetts resident insurance producer license after notifying the Massachusetts Insurance Division on November 21, 2014, that she had recently moved to that state. Massachusetts revoked Respondent's resident insurance producer license on or about October 17, 2017, and based on this action, the Division transferred Respondent's Tennessee nonresident license to inactive status on November 8, 2017. (HRG. EX. 3, ¶¶ 8 & 10; Transcript of Proceedings ("Tr.") p. 21-22).

3. Respondent's current residential and mailing addresses according to the Division's records are 545 Glendale Road, Hampden, MA 01036, and 340 S. Lemon Ave. # 9039, Walnut, CA 91789-2706, respectively. To date, there is no record of Respondent's reporting to the Petitioner's Agent Licensing Section any changes of her mailing and residential addresses from the above addresses in Hampden, Massachusetts, and Walnut, California. (HRG. EX. 3, ¶¶ 7 & 9).

4. On October 31, 2015, Respondent submitted her Tennessee nonresident insurance producer license renewal application through the National Insurance Producer Registry ("NIPR"¹), and charged the amount of \$435.00 to her credit card, representing renewal fees for her insurance producer licenses in Tennessee and South Dakota (\$205.00 for Tennessee - including a \$5.00 service charge paid to NIPR - and \$230.00 for South Dakota). The renewal transaction for Tennessee was processed and the Petitioner issued a renewal of Respondent's Tennessee nonresident insurance producer license for the period November 3, 2015, through October 31, 2017. (HRG. EX. 3, ¶ 11, and Attachment A to this Exhibit).

5. According to employees of the NIPR, at some point after October 31, 2015, Respondent submitted a dispute with her credit card company regarding the renewal fees paid to Tennessee and South Dakota, and at some point prior to May 17, 2016, her credit card company reversed \$335.00 of the payment to NIPR, leaving a combined total of \$100.00 to NIPR for both states. (HRG. EX. 3, ¶ 12).

¹ The NIPR was established as an independent non-profit affiliate of the National Association of Insurance Commissioners ("NAIC") in October 1996. According to its website, the NIPR's mission is to "support the work of the states, and the NAIC in making the producer-licensing process more cost effective, streamlined and uniform for the benefit of regulators, the insurance industry and the consumers they protect and serve."

6. On or about May 17, 2016, NIPR employees informed the Petitioner's agent licensing staff of the above actions of the Respondent, and requested that the Petitioner refund the \$200.00 which NIPR paid to Tennessee. The Division accommodated NIPR's request, and refunded this \$200 amount to NIPR on or about June 24, 2016. (HRG. EX. 3, ¶ 13, and Attachment B to this Exhibit).

7. Kimberly Biggs, the Petitioner's Director of Agent Licensing, became involved in this matter on May 17, 2016, and between May 17 and 20, 2016, Ms. Biggs exchanged several emails with Sam Lammers of NIPR, Renee Powell, Administrative Assistant 4 of Ms. Biggs' office, and the Respondent during this time period. Ms. Biggs spoke with Mr. Lammers by phone regarding this matter during this time period and is familiar with his email address of slammers@nipr.com. Ms. Biggs left a voice mail message for the Respondent during this time period and is familiar with Respondent's two (2) email addresses of chase_hunter@yahoo.com, and chaseh@chaseagency.com, which Ms. Biggs understand were used by Respondent during this time period. Ms. Biggs informed Respondent in emails sent to Respondent between May 17 and 20, 2016, that the Tennessee renewal fee of \$200.00 was correct, and requested that Respondent pay this amount and respond immediately. (HRG. EX. 3, ¶ 14, and Collective Attachment C to this Exhibit).

8. To date, Respondent has refused to pay the Petitioner the \$200.00 fee for the renewal of her Tennessee nonresident insurance producer license which was granted and issued to her for the period November 3, 2015, through October 31, 2017. (HRG. EX. 3, ¶ 15).

9. The Petitioner was permitted to assess a total renewal fee of \$200.00 as to Respondent's renewal transaction on October 31, 2015, pursuant to Tenn. Code Ann. §

56-6-121(a)(2), which sets the renewal fee at \$60.00, and Tenn. Code Ann. § 56-4-218(a), which permits the Petitioner to impose the same fees upon nonresident insurance producers which other states impose against Tennessee resident insurance producers, who also maintain nonresident licenses in other states (such as Massachusetts). (HRG. EX. 3, ¶ 16).

10. As of October 31, 2015, Massachusetts' insurance producer renewal fee was \$300 for a three (3) year license, which would equate to \$100 per year. Since Tennessee issues a two (2) year license, the equivalent licensure fee in Tennessee would be \$200 for a two (2) year period at \$100 per year. Given that the Tennessee renewal fee for a two (2) year period is set at \$60 per Tenn. Code Ann. § 56-6-121(a)(2), Tennessee must add an additional \$140 retaliatory fee for Respondent's renewal per Tenn. Code Ann. § 56-4-218(a), resulting in a total renewal fee assessed against Ms. Hunter of \$200.00. (HRG. EX. 3, ¶ 16).

11. By order entered on October 17, 2017, the Massachusetts Insurance Division revoked Respondent's Massachusetts resident insurance producer license, and assessed a \$2,000.00 fine against her. Pursuant to Tenn. Code Ann. § 56-6-108(a)(2), Respondent was no longer eligible to possess a Tennessee nonresident insurance producer license, once she lost her license as a resident insurance provider in Massachusetts, her home state. Accordingly, immediately after learning of the Massachusetts revocation, the Petitioner placed Respondent's Tennessee nonresident license on inactive status, effective November 8, 2017. (HRG. EX. 3, ¶ 17 & HRG. EX. 10; Tr. 25).

12. On or about the following dates, Respondent's resident and nonresident insurance producer licenses were revoked in the following additional states, except for West

Virginia, where Respondent's appeal of that state's refusal to renew her license was rejected:

STATE	EFFECTIVE DATE OF ORDER	TYPE OF LICENSE
Florida	August 6, 2013	Nonresident
California	September 13, 2013	Nonresident
Ohio	March 4, 2015	Nonresident
Virginia	April 9, 2015	Resident
West Virginia	October 20, 2016	Nonresident
Texas	May 8, 2013	Nonresident
Wyoming	August 8, 2014	Nonresident

Ms. Biggs has confirmed the above seven (7) additional orders entered against Ms. Hunter by seven (7) additional states, and notes that each of these orders are verified by the attached copy of a December 11, 2017 printout listing regulatory actions against Ms. Hunter from the Regulatory Information Retrieval System ("RIRS") of the Producer Database ("PDB") of the NAIC. (HRG. EXS. 3, ¶ 18, and Attachment D to this Exhibit; HRG. EXS. 4-9; Tr. 22-25).

13. Respondent failed to report to the Commissioner six (6) of the above seven (7) administrative actions (California being the exception) which revoked or refused to renew her insurance producer licenses in the listed states within thirty (30) days after the final disposition of those matters, as is required by Tenn. Code Ann. § 56-6-119(a). (HRG. EX. 3, ¶ 19).

CONCLUSIONS OF LAW

1. In accordance with TENN. COMP. R. & REGS. 1360-04-01-.02(7) and 1360-04-01-.15(3), the Petitioner has proven by a preponderance of evidence that the facts alleged in the AMENDED NOTICE OF HEARING AND CHARGES pertaining to the Respondent are true and that the issues raised therein should be resolved in its favor.

2. TENN. CODE ANN. § 56-6-107(b)(1) & (c) provide:

(b)(1) For licenses issued or renewed on or after January 1, 2007, the licenses shall remain in effect for twenty-four (24) months from the last day of the licensee's birth month.

....

(c) At the end of the twenty-four (24) months, the insurance producer license may be renewed, subject to the limitations set forth in § 56-6-112, by paying the applicable fee set forth in § 56-6-121 and submitting the renewal form prescribed by the commissioner....

....

3. TENN. CODE ANN. § 56-6-108(a)(1) - (4) provide:

(a) Unless denied licensure pursuant to § 56-6-112, a nonresident person shall receive an insurance producer license if:

(1) The person is currently licensed as a resident insurance producer in the person's home state;

(2) The person has submitted the proper request for licensure and has paid the applicable fees required by § 56-6-121;

(3) The person has submitted or transmitted to the commissioner the application for licensure that the person submitted to the person's home state, or in lieu of the same, a completed uniform application; and

(4) The person's home state awards insurance producer licenses to residents of this state on the same basis.

4. TENN. CODE ANN. §§ 56-6-112(a)(2), (a)(3), (a)(9), (g) & (h) provide:

The commissioner may place on probation, suspend, revoke, or refuse to issue or renew a license issued under this part or may levy a civil penalty in accordance with this section or take any combination of those actions, for any one (1) or more of the following causes:

...

(2) Violating any law, rule, regulation, subpoena or order of the commissioner or of another state's commissioner;

(3) Obtaining or attempting to obtain a license through misrepresentation or fraud;

....

(9) Having an insurance producer license, or its equivalent, denied, suspended or revoked in another state, province, district, or territory[.]

....

(g) If . . . the commissioner finds that any person required to be licensed, permitted, or authorized by the division of insurance

pursuant to this chapter has violated any statute, rule or order, the commissioner may, at the commissioner's discretion, order:

(1) The person to cease and desist from engaging in the act or practice giving rise to the violation.

(2) Payment of a monetary penalty of not more than one thousand dollars (\$1,000) for each violation, but not to exceed an aggregate penalty of one hundred thousand dollars (\$100,000). This subdivision (g)(2) shall not apply where a statute or rule specifically provides for other civil penalties for the violation. For purposes of this subdivision (g)(2), each day of continued violation shall constitute a separate violation; and

(3) The suspension or revocation of the person's license.

(h) In determining the amount of penalty to assess under this section, the commissioner shall consider:

(1) Whether the person could reasonably have interpreted such person's actions to be in compliance with the obligations required by a statute, rule or order;

(2) Whether the amount imposed will be a substantial economic deterrent to the violator;

(3) The circumstances leading to the violation;

(4) The severity of the violation and the risk of harm to the public;

(5) The economic benefits gained by the violator as a result of noncompliance;

(6) The interest of the public; and

(7) The person's efforts to cure the violation.

5. TENN. CODE ANN. § 56-6-119(a) provides:

[a] producer shall report to the commissioner any administrative action taken against the producer in another jurisdiction or by another governmental agency in this state within thirty (30) days of the final disposition of the matter. This report shall include a copy of any order entered or other relevant legal documents.

6. TENN. CODE ANN. § 56-6-121(2) provides:

In addition to any other fees that may be required elsewhere in this title, the following are the nonrefundable fees that will be paid to the commissioner under this part:

....
(2) Sixty dollars (\$60.00) for the renewal of an insurance producer license[;]

7. TENN. CODE ANN. § 56-4-218(a) provides, in pertinent part:

[w]hen, by the laws of any other state or foreign country, any premium or income or other taxes, or any fees, fines, penalties, licenses, deposit requirements or other obligations, prohibitions or restrictions are imposed upon Tennessee insurance companies doing business in the other state or foreign country, or upon their agents in the other state or foreign country, that are in excess of the taxes, fees, fines, penalties, licenses, deposit requirements or other obligations, prohibitions or restrictions imposed upon the insurance companies of the other state or foreign country doing business in this state, or that might seek to do business in this state, or upon their agents in the state, so long as the laws continue in force, the same premium or income or other taxes, or fees, fines, penalties, licenses, deposit requirements or other obligations, prohibitions and restrictions of whatever kind shall be imposed upon the companies of the other state or foreign country doing business in this state, or upon their agents in this state....

8. With respect to Count One of the AMENDED NOTICE OF HEARING AND CHARGES, the Petitioner has shown by a preponderance of the evidence that the Respondent violated laws of the Commissioner in violation of TENN. CODE ANN. § 56-6-112(a)(2); and that by reversing her credit card transaction as set forth above which resulted in her possessing a Tennessee insurance producer license for a two (2) year period (November 3, 2015 – October 31, 2017) without paying the required renewal fees and by not responding to Ms. Biggs' requests that she do so in May 2016, Respondent has obtained a renewal of her Tennessee insurance producer license by fraud in violation of TENN. CODE ANN. § 56-6-112(a)(3). This conduct on Respondent's part constitutes a continuing violation pursuant to TENN. CODE ANN. § 56-6-112(g)(2), in that the Respondent has refused to pay this

required fee to the Petitioner through the present, despite the Petitioner's demands that she do so.

9. Further, as to Count Two of the AMENDED NOTICE OF HEARING AND CHARGES, the Petitioner has shown by a preponderance of the evidence that the Respondent violated TENN. CODE ANN. § 56-6-112(a)(9), due to the seven (7) revocations of her insurance producer licenses in the states of Massachusetts, Florida, California, Ohio, Virginia, Texas, and Wyoming. Finally, as to Count Three of the AMENDED NOTICE OF HEARING AND CHARGES, the Petitioner has shown by a preponderance of the evidence that the Respondent violated TENN. CODE ANN. § 56-6-119(a) on multiple occasions, given that she never reported or delivered to the Commissioner any of the states' revocation orders or orders denying her renewal applications (except for California's revocation order), which were entered against her as listed in numbered paragraph 12 of the above FINDINGS OF FACT, within thirty (30) days after the entry of said orders.

10. It is determined that the proof adduced at hearing provides adequate grounds for the revocation of Respondent's Tennessee nonresident insurance producer license, and for the imposition of a civil penalty against Respondent in the total amount of nine thousand dollars (\$9,000), calculated as follows:

(a) As to Count One: a single one thousand dollar (\$1,000) civil penalty for the Respondent's initial fraudulent reversal of the credit card payment of her renewal fees in violation of TENN. CODE ANN. §§ 56-6-112(a)(2) & (a)(3), and an aggregate four thousand dollar (\$4,000) civil penalty for her continuing violations of these sections given that she has not paid this sum to the Petitioner through the present, for a sub-total of five thousand dollars (\$5,000) in civil penalties as to this Count;

(b) As to Count Two: a civil penalty of two thousand dollars (\$2,000) for the seven (7) revocations of her insurance producer licenses in the states of Massachusetts, Florida, California, Ohio, Virginia, Texas, and Wyoming (where each such revocation violates TENN. CODE ANN. § 56-6-112(a)(9), and could

warrant a separate one thousand dollar (\$1,000) civil penalty), for a sub-total of two thousand dollars (\$2,000) as to this Count; and

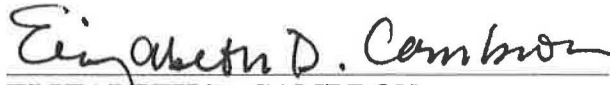
(c) As to Count Three: a civil penalty of two thousand dollars (\$2,000) for the six (6) instances where Respondent never reported or delivered to the Commissioner the six (6) final administrative actions where her license was revoked or an order was entered denying her renewal application as listed in numbered paragraph 12 of the above FINDINGS OF FACT, within thirty (30) days after the entry of said orders (where each instance of failing to timely report violates TENN. CODE ANN. § 56-6-119(a), and each instance could warrant a separate one thousand dollar (\$1,000) civil penalty), for a sub-total of two thousand dollars (\$2,000) as to this Count.

JUDGMENT

IT IS, THEREFORE, ORDERED that:

1. The Respondent's Tennessee nonresident insurance producer license (No. 0899154) is hereby **REVOKED**, due to her actions in violation of Tenn. Code Ann. §§ 56-6-112(a)(2), (a)(3), (a)(9), & 56-6-119(a), as described above.
2. The Respondent is **ASSESSED** a civil penalty of nine thousand dollars (\$9,000), based on her violations of the four (4) statutes cited above, as described and calculated within numbered paragraph 10 of the above CONCLUSIONS OF LAW.
3. The Respondent, and any and all persons who may assist her in any of the aforementioned violations of Tenn. CODE Ann. § 56-6-112, **shall CEASE and DESIST** from any such activities.
4. This INITIAL ORDER, imposing sanctions against the Respondent, is entered to protect the public and consumers of insurance products sold by Tennessee licensed insurance producers, consistent with the purposes fairly intended by policy and provisions of the Law.

This INITIAL ORDER entered and effective this the 6TH day of JUNE, 2018.


ELIZABETH D. CAMBRON
ADMINISTRATIVE JUDGE
ADMINISTRATIVE PROCEDURES DIVISION
OFFICE OF THE SECRETARY OF STATE

Filed in the Administrative Procedures Division, Office of the Secretary of State, this
the 6TH of JUNE 2018.

J. Richard Collier

**J. RICHARD COLLIER, DIRECTOR
CHIEF ADMINISTRATIVE LAW JUDGE
ADMINISTRATIVE PROCEDURES DIVISION
OFFICE OF THE SECRETARY OF STATE**

APPROVED FOR ENTRY:



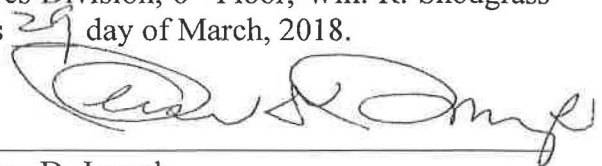
Jesse D. Joseph, BPR# 10509
Assistant General Counsel-Litigation
TN Department Of Commerce and Insurance
500 James Robertson Parkway, 8th Floor
Nashville, Tennessee 37243
Telephone: (615) 253-4701
Jesse.Joseph@tn.gov

Certificate of Service

I hereby certify that I have served a copy of the Petitioner's Proposed Initial Order upon the Respondent, by forwarding, via first class mail, a copy of same to Respondent at each of the following addresses:

- (1) Chase Carmen Hunter, 545 Glendale Road, Hampden, MA 01036; and
- (2) Chase Carmen Hunter, 340 S. Lemon Ave. # 9039, Walnut, CA 91789-2706;

and that I have filed the original of this Proposed Initial Order with the Office of the Secretary of State, Administrative Procedures Division, 8th Floor, Wm. R. Snodgrass Tennessee Tower, Nashville, Tennessee, on this 29 day of March, 2018.



Jesse D. Joseph

APPENDIX A TO INITIAL ORDER
NOTICE OF APPEAL PROCEDURES

Review of Initial Order

This Initial Order shall become a Final Order (reviewable as set forth below) fifteen (15) days after the entry date of this Initial Order, unless either or both of the following actions are taken:

(1) A party files a petition for appeal to the agency, stating the basis of the appeal, or the agency on its own motion gives written notice of its intention to review the Initial Order, within fifteen (15) days after the entry date of the Initial Order. If either of these actions occurs, there is no Final Order until review by the agency and entry of a new Final Order or adoption and entry of the Initial Order, in whole or in part, as the Final Order. A petition for appeal to the agency must be filed within the proper time period with the Administrative Procedures Division of the Office of the Secretary of State, 8th Floor, William R. Snodgrass Tower, 312 Rosa L. Parks Avenue, Nashville, Tennessee, 37243-1102. (Telephone No. (615) 741-7008). See Tennessee Code Annotated, Section (T.C.A. §) 4-5-315, on review of initial orders by the agency.

(2) A party files a petition for reconsideration of this Initial Order, stating the specific reasons why the Initial Order was in error within fifteen (15) days after the entry date of the Initial Order. This petition must be filed with the Administrative Procedures Division at the above address. A petition for reconsideration is deemed denied if no action is taken within twenty (20) days of filing. A new fifteen (15) day period for the filing of an appeal to the agency (as set forth in paragraph (1) above) starts to run from the entry date of an order disposing of a petition for reconsideration, or from the twentieth day after filing of the petition, if no order is issued. See T.C.A. §4-5-317 on petitions for reconsideration.

A party may petition the agency for a stay of the Initial Order within seven (7) days after the entry date of the order. See T.C.A. §4-5-316.

Review of Final Order

Within fifteen (15) days after the Initial Order becomes a Final Order, a party may file a petition for reconsideration of the Final Order, in which petitioner shall state the specific reasons why the Initial Order was in error. If no action is taken within twenty (20) days of filing of the petition, it is deemed denied. See T.C.A. §4-5-317 on petitions for reconsideration.

A party may petition the agency for a stay of the Final Order within seven (7) days after the entry date of the order. See T.C.A. §4-5-316.

YOU WILL NOT RECEIVE FURTHER NOTICE OF THE INITIAL ORDER BECOMING A FINAL ORDER

A person who is aggrieved by a final decision in a contested case may seek judicial review of the Final Order by filing a petition for review in a Chancery Court having jurisdiction (generally, Davidson County Chancery Court) within sixty (60) days after the entry date of a Final Order or, if a petition for reconsideration is granted, within sixty (60) days of the entry date of the Final Order disposing of the petition. (However, the filing of a petition for reconsideration does not itself act to extend the sixty day period, if the petition is not granted.) A reviewing court also may order a stay of the Final Order upon appropriate terms. See T.C.A. §4-5-322 and §4-5-317.