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Attorney General

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Attorneys for Idaho Department of Insurance

FILED

APR 08 2025

**Department of Insurance
State of Idaho**

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE
STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

ZON RE-USA, LLC, a Connecticut limited
liability company holding Idaho Third-Party
Administrator License No. 320220,

Respondent.

Docket No. 18-4665-25

ORDER OF DEFAULT

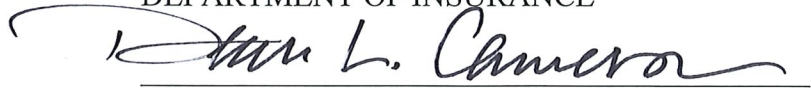
The Director of the Idaho Department of Insurance (“Director”) having reviewed the record herein; and Zon Re-USA, LLC (“Zon Re”) who currently holds Idaho Third-Party Administrator License No. 320220, having been lawfully served the Verified Complaint and Notice of Right to Hearing (“Complaint”), a copy of which is attached hereto as Exhibit A and incorporated herein, and, as evident from the Affidavit of Matt Steen, having failed to file an answer thereto and having failed to request a hearing regarding said Complaint; and the Director having found as a result

thereof that Zon Re is in default and has waived their rights regarding the opportunity for hearing;
and in consideration of the above;

IT IS HEREBY ORDERED that Idaho Third-Party Administrator License No. 320220
issued to Zon Re-USA, LLC is REVOKED effective immediately.

DATED this 8th day of April, 2025.

STATE OF IDAHO
DEPARTMENT OF INSURANCE

A handwritten signature in black ink, reading "Dean L. Cameron", is written over a horizontal line. The signature is fluid and cursive.

DEAN L. CAMERON
Director

NOTIFICATION REGARDING REPORTABLE PROCEEDINGS

This is considered a reportable administrative proceeding. As such, it is a public record and is public information that may be disclosed to other states and reported to companies by which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the online searchable database of the Idaho Department of Insurance.

NOTIFICATION OF RIGHTS

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The agency will dispose of the motion for reconsideration within twenty-one (21) days of its receipt, or the motion will be considered denied by operation of law. *See* Idaho Code § 67-5246(4).

Any such motion for reconsideration shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
700 W. State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720-0043

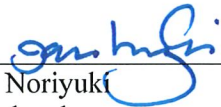
Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order or orders previously issued in this case may file a petition for judicial review in the district court of the county in which: (1) a hearing was held; or (2) the final agency action was taken; or (3) the party seeking review of the order resides or operates its principal place of business in Idaho; or (4) the real property or personal property that was the subject of the agency action is located.

A petition for judicial review must be filed within twenty-eight (28) days of: (a) the service date of this final order; (b) the service of an order denying motion for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration, whichever is later. *See* Idaho Code § 67-5273. The filing of a petition for judicial review does not itself stay the effectiveness or enforcement of the order under appeal. *See* Idaho Code § 67-5274.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of April, 2025, I caused a true and correct copy of the foregoing ORDER OF DEFAULT to be served upon the following parties by the designated means:

Zon Re-USA, LLC Charlene Fiore 220 Newport Center Drive, Suite 446 Newport Beach, CA 92660	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: licensing@zonre.com
Matt Steen Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 rd Floor PO Box 83720 Boise, ID 83720-0043	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: matt.steen@doi.idaho.gov



Jan Noriyuki
Paralegal

Raúl R. Labrador
Attorney General

MATT STEEN - ISB No. 10285
Deputy Attorney General
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Attorneys for Idaho Department of Insurance

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MAR 18 2025

**Department of Insurance
State of Idaho**

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE
STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

ZON RE-USA, LLC, a Connecticut limited
liability company holding Idaho Third-Party
Administrator License No. 320220,

Respondent.

Docket No. 18-4665-25

**VERIFIED COMPLAINT AND
NOTICE OF RIGHT TO HEARING**

COMES NOW the staff of the Idaho Department of Insurance (“Department”), by and through its undersigned counsel, Matt Steen, Deputy Attorney General, and does hereby give notice of verified allegations constituting violation(s) of Idaho law, notice that relief will be requested from the Director of the Department, and a notice of the right to contest the allegations and requested relief herein and right to hearing to:

EXHIBIT

A

Zon Re-USA, LLC
Idaho Third-Party Administrator License No. 320220

The Department alleges the following facts and violations of title 41, Idaho Code, as itemized below. The Department will present an order seeking the relief described below upon twenty-one (21) days following service of this Verified Complaint, and Zon Re-USA, LLC is further notified of its right to object to the requested relief, including the basis for any objection, and to request a hearing in writing.

JURISDICTION

1. Jurisdiction in this matter is founded in the Idaho Insurance Code, Idaho Code § 41-101 et seq., including Idaho Code § 41-210, which authorizes the Director of the Department of Insurance (“Director”) to enforce the provisions of title 41 of the Idaho Code, including those governing Respondent’s activities as an insurer.

2. Jurisdiction is further founded in Idaho Code § 41-213, which authorizes the Department to institute such proceedings as deemed necessary for the enforcement of any provision of the Idaho Insurance Code including, but not limited to, license revocation and the imposition of administrative penalties.

RESPONDENTS

3. Zon Re-USA, LLC (“Zon Re”), at all pertinent times herein, is and was a Connecticut limited liability company holding Idaho Third-Party Administrator License No. 320220, which is due to expire on December 31, 2025.

CONTROLLING LAW

4. Idaho Code § 41-914 provides that each third-party administrator licensed under the provisions of Chapter 9, Title 41, Idaho Code, shall file an annual report for the preceding

calendar year with the Director of the Department on or before July 1 of each year, or within such extension of time as the Director for good cause may grant.

5. Idaho Code § 41-915(2)(a) provides that the Director may deny, suspend, or revoke the license of a third-party administrator if the Director finds that the administrator has violated any lawful rule or order of the Director, or any provision of Title 41, Idaho Code.

6. Idaho Code § 41-117 provides that each violation of the code for which a greater penalty is not provided by another provision of this code or by other applicable laws of this state, shall in addition to any applicable prescribed denial, suspension, or revocation of certificate of authority or license be punishable by an administrative penalty of not more than one thousand dollars (\$1,000) for any individual or natural person and not more than five thousand dollars (\$5,000) for any other person, imposed by the Director, and upon conviction by a fine of not more than one thousand dollars (\$1,000) or by imprisonment in the county jail for a period not to exceed six (6) months, or by both such fine and imprisonment in the discretion of the court. Each instance of violation may be considered a separate offense.

COUNT I

7. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

8. As a licensed third-party administrator, Zon Re was required to file its annual report for the calendar year 2023 on or before July 1, 2024.

9. Zon Re did not file its annual report on or before July 1, 2024.

10. The Department notified Zon Re of its failure to file on October 28, 2024; and December 11, 2024.

11. As of this filing, Zon Re has not filed its annual report for the 2023 calendar year.

12. By failing to file the annual report mandated by Idaho Code § 41-914, Zon Re violated Idaho Code § 41-915(2)(a).

PRAYER FOR RELIEF

Based on the foregoing facts and allegations, the Department prays for relief as follows:

1. For an Order revoking Zon Re's Idaho Third-Party Administrator License No. 320220; and
2. For such other and further relief as the Director deems just and necessary under the circumstances.

NOTIFICATION OF RIGHTS

To: Zon Re-USA, LLC, the above-named Respondent:

Pursuant to Idaho Code § 41-232A, you have the right to a hearing on this matter. In order to exercise this right, a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the 21-day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2). If you fail to submit a timely written response to the allegations within 21 days of the service of this Complaint, a final order will be entered imposing the relief described above.

Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter at the following

address:

Matt K. Steen
Deputy Attorney General
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

In lieu of a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241(1)(c). Should you wish to discuss these options, please contact the undersigned deputy attorney general.

DATED this 18th day of March, 2025.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL



Matt K. Steen
Deputy Attorney General
Attorneys for Idaho Department of Insurance

VERIFICATION

STATE OF IDAHO)
 : ss.
County of Ada)

ERIC FLETCHER, Bureau Chief of the Company Activities Bureau of the Department of Insurance, State of Idaho, being first duly sworn, deposes and says:

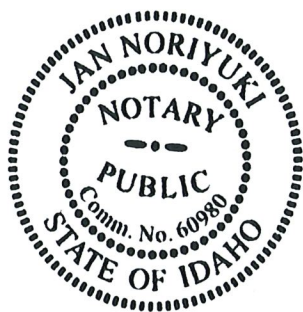
I have read the foregoing *Verified Complaint and Notice of Right to Hearing* and know the contents thereof and under penalty of perjury pursuant to the laws of the State of Idaho, verify that the foregoing is true and correct to the best of my knowledge and belief.


Dated this 18th day of March, 2025.



ERIC FLETCHER
Bureau Chief
Company Activities Bureau

SUBSCRIBED AND SWORN to before me the undersigned Notary Public for the State of Idaho this 18th day of March, 2025.




Notary Public for Idaho
Residing at: Boise, ID
My Commission Expires: 01-28-2031

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of March, 2025, I caused a true and correct copy of the VERIFIED COMPLAINT AND NOTICE OF RIGHT TO HEARING to be served upon the following parties by the method(s) indicated below:

Zon Re-USA, LLC Charlene Fiore 220 Newport Center Drive, Suite 446 Newport Beach, CA 92660	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: licensing@zonre.com
Matt Steen Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 rd Floor PO Box 83720 Boise, ID 83720-0043	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: matt.steen@doi.idaho.gov



Jan Noriyuki
Paralegal