

**FILED**

**SEP 19 2025**

**Department of Insurance  
State of Idaho**

RAÚL LABRADOR  
Attorney General

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

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**

**STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE

Complainant,

vs.

Terry Seeley, an individual holding Idaho  
Nonresident Producer License No. 16248654,

Respondent.

Docket No. 18-4748-25

**ORDER OF DEFAULT**

The Director of the Idaho Department of Insurance (the “Director”) having reviewed the record herein; and Terry Seeley (“Seeley”) who currently holds Idaho Nonresident Producer License No. 16248654, 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 Seeley is in default and has waived his rights regarding the opportunity for hearing; and is consideration of the above;

*It is hereby ordered* that the Idaho Nonresident Producer License No. 16248654 issued to Terry Seeley is revoked effective immediately.

*It is further ordered* that Seeley shall pay to the Idaho Department of Insurance an administrative penalty of two thousand dollars (\$2,000).

Dated this 19 day of September 2025.

STATE OF IDAHO  
DEPARTMENT OF INSURANCE



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  
Idaho Department of Insurance  
700 W State Street, 3<sup>rd</sup> Floor  
PO 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 subject of the agency action is located.

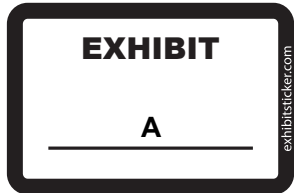
A petition for judicial review must be filed within twenty-eight (28) days of: (a) the service date of this final order; (b) the service of an order denying motion for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration, whichever is later. *See* Idaho Code § 67-5273. The filing of a petition for judicial review does not in 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 19<sup>th</sup> day of September 2025, I caused a true and correct copy of the foregoing ORDER OF DEFAULT to be served upon the following parties by the method(s) identified below:

Terry Seeley 4053 Kirkwall South Jordan, UT 84095	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Email: <a href="mailto:tseeley55@yahoo.com">tseeley55@yahoo.com</a>
Nationwide Life and Annuity Ins. Co. One West Nationwide Blvd, 1-14-304 Columbus, OH 43215-2220	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Email:
North American Co. for Life and Health Ins. 8300 Mills Civic Parkway West Des Moines, IA 50266	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Email:
Pacific Life Insurance Company 700 Newport Center Dr Newport Beach, CA 92660	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Email:

  
\_\_\_\_\_  
Jan Noriyuki  
Paralegal



FILED

AUG 27 2025

Department of Insurance  
State of Idaho

RAÚL LABRADOR  
Attorney General

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

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

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

TERRY SEELEY, an individual holding Idaho  
Nonresident Producer License No. 16248654,

Respondent.

Docket No. 18-4748-25

**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 K. 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:

**TERRY SEELEY**  
**Idaho Nonresident Producer License No. 16248654**

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 TERRY SEELEY is further notified of his 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 insurance producer.

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.

**CONTROLLING LAW**

3. Section 41-1016(1), Idaho Code, provides that the Director may suspend, revoke or refuse to issue or renew a producer’s license and may impose an administrative penalty up to one thousand dollars (\$1,000), if the Director finds that any of the causes or violations set forth in subsections 41-1016(1)(a) through (o) exist, including, but not limited to subsections (b) and (i), for:

(b) violating any provision of title 41, Idaho Code, department rule, subpoena or order of the director of another state’s insurance director;

(i) having an insurance license denied, suspended or revoked in any other state, province, district or territory.

4. Section 41-1021(1), Idaho Code, states a producer shall report to the director any administrative action taken against the producer in another jurisdiction or by another governmental agency within thirty (30) days of the final disposition of the matter.

5. Section 41-117, Idaho Code, provides that each instance of violation may be considered a separate offense.

### **RESPONDENT**

6. TERRY SEELEY (hereinafter “Seeley” or “Respondent Seeley”) is a Utah resident and holds active Idaho Nonresident Producer License No. 16248654, which was originally issued on December 12, 2019.

### **FACTUAL ALLEGATIONS**

#### **COUNT I**

7. All of the foregoing paragraphs are re-alleged and incorporated herein as if set forth in full.

8. On January 22, 2025, the California Department of Insurance issued a Default Decision and revocation of Seeley’s license related to allegations of failing to notify the Insurance Commissioner that felony charges were filed against Seeley in state court in Utah due to securities fraud, acting as an unlicensed investment advisor, the selling of unregistered securities, and a pattern of unlawful practice, among other allegations.

9. Seeley, through his attorney, waived his right to hearing and asserted he understood that withdrawing his Notice of Defense may result in an order of revocation against him.

10. On June 5, 2025, The Florida Department of Financial Services, Division of Insurance Agent and Agency Services issued a Notice of Temporary Suspension for Seeley’s

license based substantively on the same allegations as the California action.

11. On June 9<sup>th</sup>, 2025, Lori Thomason of the DOI emailed Seeley requesting that he report the regulatory actions as required by Section 41-1021, Idaho Code.

12. On August 12<sup>th</sup>, 2025, Seeley called Mrs. Thomason saying he had received her email but did not want to report his actions out of fear he would have his license revoked in other states. Mrs. Thomas reiterated he had a duty to report the actions.

13. As of this date, Seeley has not reported the action to the Department.

14. The Department alleges that the actions against Mr. Seeley in California and Florida justify revocation of his Idaho nonresident license pursuant to Idaho Code § 41-1016(1)(i).

15. The Department alleges that Seeley also violated Idaho Code § 41-1021 two (2) times by failing to notify the Department of the administrative actions by California and Florida within thirty (30) days.

16. Based on the allegations noted herein, the Department is seeking an Order imposing an administrative penalty against Respondent Seeley in the amount of \$1,000 per violation of Section 41-1021, Idaho Code, for a total of \$2,000.

#### **PRAYER FOR RELIEF**

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

1. For an Order revoking TERRY SEELEY's Idaho Nonresident Producer License No. 16248654.

2. For an Order that, in the event TERRY SEELEY files an application for any license under title 41, Idaho Code, TERRY SEELEY must first petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license.

3. For and Order imposing an administrative penalty against TERRY SEELEY in the amount of \$1,000 per violation, for a total of \$2,000.00 for the violations alleged in Count I.

4. In the event of default in this action, the Department asks for an award of not less than \$2,000.

For such other and further relief as the Director deems just and necessary under the circumstances.

DATED this 27<sup>th</sup> day of August 2025.

STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL



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MATT K. STEEN  
Deputy Attorney General


**VERIFICATION**

STATE OF IDAHO            )  
  : ss.  
County of Ada                )

ERIC FLETCHER, Consumer Services Bureau Chief, Department of Insurance, State of Idaho, being first duly sworn, deposes and says:


I have read the foregoing Complaint and know the contents thereof and the same are true to the best of my knowledge and belief.

DATED this 27<sup>th</sup> day of August 2025.

  
\_\_\_\_\_  
ERIC FLETCHER

SUBSCRIBED AND SWORN to before me, the undersigned Notary Public for the state of Idaho, this 27<sup>th</sup> day of August 2025.



  
\_\_\_\_\_  
Notary Public for Idaho  
My Commission Expires 01-28-2031

## NOTIFICATION OF RIGHTS

**To: Terry Seeley, 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 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

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

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

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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27<sup>th</sup> day of August 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:

Terry A. Seeley 4053 Kirkwall South Jordan, UT 84095	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Email: <a href="mailto:tseeley55@yahoo.com">tseeley55@yahoo.com</a>
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Pacific Life Insurance Company 700 Newport Center Dr Newport Beach, CA 92660	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Email:

  
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Jan Noriyuki  
Paralegal