

LAWRENCE G. WASDEN  
Attorney General

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**FILED**  
**JUN 22 2016**   
**Department of Insurance**  
**State of Idaho**

*Attorney for the Director of the Department of Insurance*

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

In the Matter of:

SCOTT WILLIAMS

Nonresident Surplus Lines Broker License  
No. 501650 and Nonresident Producer  
License No. 483910

Docket No. 18-3158-16

**ORDER ON REQUEST TO  
VACATE ORDER OF DEFAULT**

The Director of the Idaho Department of Insurance (**Director**), having reviewed the record herein, including the Request to Vacate Order of Default submitted by Scott Williams (**Williams**) on June 1, 2016, by email to the Department of Insurance (**Department**), and the Department's Objection to Request to Vacate the Order of Default filed herein on June 10, 2016, hereby issues his findings and conclusions and enters an order as follows.

**BACKGROUND**

1. The Department filed and served a Verified Complaint and Notice of Right to Hearing (**Verified Complaint**) on Williams on April 27, 2016. The Verified Complaint included

four causes of action for which the Department sought sanctions against Williams.

2. The Department alleged in its first cause of action that Williams failed to register with the Idaho Surplus Lines Association as required pursuant to the terms of his Idaho nonresident surplus lines broker license and was therefore in violation of the Idaho Insurance Code. For this violation, the Department sought revocation of Williams' surplus lines broker license and imposition of a \$1,000 penalty, pursuant to Idaho Code §§ 41-1016(1)(b) and 41-117.

3. The Department alleged in its second cause of action that Williams failed to file annual reports of all surplus lines insurance business transacted for calendar years 2014 and 2015 and to pay taxes due, if any. For this violation, the Department sought revocation of Williams' surplus lines broker license and imposition of a fine of \$25.00 per day commencing April 1, 2015, pursuant to Idaho Code §§ 41-1224(1)(a) and 41-1230.

4. In its third cause of action, the Department sought revocation of Williams' nonresident producer license simultaneous with revocation of his surplus lines broker license, pursuant to Idaho Code § 41-1224(3).

5. The Department alleged in its fourth cause of action that Williams failed to notify the Department of changes in his contact information, including a change of his business address and telephone number, as required by Idaho Code § 41-1008(6). For such violation, the Department sought imposition of a \$500 penalty pursuant to Idaho Code § 41-1016(1)(b).

6. The Verified Complaint also stated the efforts to contact Williams before the Verified Complaint was filed by both the Idaho Surplus Lines Association and the Department. All such efforts failed.

6. Pursuant to Idaho Code § 41-232A(2), Williams had twenty-one (21) days from

the date of service of the Department's Verified Complaint to file an answer, request a hearing, or otherwise object to the Department's requested relief.

7. On May 25, 2016, Deputy Attorney General Judy L. Geier, counsel for the Department, filed an affidavit stating that, as of the date of the affidavit, Williams had failed to file an answer, request a hearing, or make any appearance in this matter.

8. Based on the foregoing, the Director entered an Order of Default on May 26, 2016, granting the relief requested by the Department in its Verified Complaint. Specifically, the Order of Default revoked Williams' Idaho Nonresident Surplus Lines Broker License No. 501650 and Idaho Nonresident Producer License No. 483910 and imposed fines and penalties against Williams in the total amount of Twelve Thousand Dollars (\$12,000).

9. Pursuant to Idaho Code § 67-5246(4), and as provided in the Notification of Rights attached to the Order of Default, any party may file a motion for reconsideration of a final order within fourteen (14) days of service of the final order.

10. On June 1, 2016, the Department received from Williams by email a Request to Vacate the Order of Default (**Request to Vacate**). In his Request to Vacate, Williams provided various explanations for, but did not deny, the violations alleged in the Verified Complaint and stated that he "would gladly surrender" his Idaho licenses.

11. On June 10, 2016, the Department filed an Objection to Request to Vacate the Order of Default (**Objection**). The Department objected specifically to vacating the revocation of Williams' surplus lines broker license and nonresident producer license, but stated that it did not object to a reduction and/or deferment of the administrative penalty.

#### **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

12. The Director, having reviewed the record herein, finds that Williams did violate

the Idaho Insurance Code as alleged in the Department's Verified Complaint and concludes that there is a sound basis for the sanctions imposed against Williams in the Order of Default. The Director further finds that Williams failed to provide sufficient justification to overturn the Order of Default. However, in light of the relative positions of the parties as stated in Williams' Request to Vacate and the Department's Objection, and based on the representations of Williams that he sold no surplus policies in Idaho and had no intention to do so, the Director further concludes that modification of the sanctions is appropriate.

**ORDER**

NOW, THEREFORE, IT IS HEREBY ORDERED that Williams' Request to Vacate the Order of Default is DENIED.

IT IS HEREBY FURTHER ORDERED that the revocation of Williams' Idaho Nonresident Surplus Lines Broker License No. 501650 and Idaho Nonresident Producer License No. 483910 shall remain in effect as provided in the Order of Default.

IT IS HEREBY FURTHER ORDERED that the fines and penalties imposed against Williams pursuant to Idaho Code § 41-1230 in the Order of Default shall be reduced to Four Thousand Five Hundred Dollars (\$4,500.00) for a total assessed penalty of Six Thousand Dollars (\$6,000) due upon entry of this Order.

IT IS SO ORDERED.

DATED this 22 day of June, 2016.

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 of which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the Idaho Department of Insurance's online searchable database. Be aware that you may be required to disclose this proceeding on any license application, and you may be required to report this action to any and all states in which you hold an insurance license.

### **NOTIFICATION OF RIGHTS**

This constitutes a final order of the agency. Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order may appeal it by filing a petition for judicial review in the district court of the county in which: (1) the hearing was held; or (2) the final agency action was taken; or (3) the aggrieved party 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 decision is located. An appeal must be filed within twenty-eight (28) days of: (a) the service date of this final order, or (b) an order denying a petition for reconsideration, or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration, whichever is later. See Idaho Code § 67-5273. The filing of a petition for judicial review to the district court does not itself stay the effectiveness or enforcement of the order under appeal.

### CERTIFICATE OF SERVICE

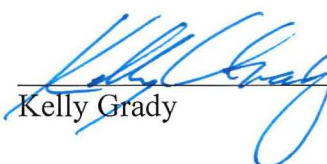
I HEREBY CERTIFY that I have, on this 22 day of June, 2016, caused a true and correct copy of the foregoing ORDER ON REQUEST TO VACATE ORDER OF DEFAULT to be served upon the following by the designated means:

Scott Williams  
604 S. Emerson Street  
Mount Prospect, IL 60056-3838

- ☒ first class mail
- ☐ certified mail
- ☐ hand delivery
- ☐ via facsimile

Judy L. Geier  
Deputy Attorney General  
Idaho Department of Insurance  
700 W. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, ID 83720-0043

- ☐ first class mail
- ☐ certified mail
- ☒ hand delivery
- ☐ via facsimile

  
\_\_\_\_\_  
Kelly Grady

LAWRENCE G. WASDEN  
Attorney General

JUDY L. GEIER, ISB No. 6559  
Deputy Attorney General  
State of Idaho  
Department of Insurance  
700 W. State Street  
P.O. Box 83720  
Boise, Idaho 83720-0043  
Telephone No. (208) 334-4204  
Facsimile No. (208) 334-4298  
[judy.geier@doi.idaho.gov](mailto:judy.geier@doi.idaho.gov)

**FILED**  
**MAY 26 2016**   
Department of Insurance  
State of Idaho

*Attorneys for the Department of Insurance*

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

**STATE OF IDAHO**

In the Matter of:

SCOTT WILLIAMS

Nonresident Surplus Lines Broker License  
No. 501650 and Nonresident Producer  
License No. 483910

Docket No. 18-3158-16

**ORDER OF DEFAULT**

The Director of the Idaho Department of Insurance ("Director") having reviewed the record herein; and SCOTT WILLIAMS, who currently holds Nonresident Surplus Lines Broker License No. 501650 and Nonresident Producer License No. 483910, having been lawfully served the Verified Complaint and Notice of Right to Hearing, a copy of which is attached hereto as Exhibit A and incorporated herein, and, as evident from the Affidavit of Judy L. Geier, having failed to file an answer thereto and having failed to request a hearing regarding said Verified Complaint; and the Director having found as a result thereof that SCOTT WILLIAMS has waived his rights regarding the opportunity for hearing; and in consideration of the above;

IT IS HEREBY ORDERED that an administrative penalty of One Thousand Dollars



(\$1,000.00) is hereby imposed against SCOTT WILLIAMS for failing to join the Surplus Lines Association of Idaho.

IT IS FURTHER ORDERED, pursuant to Idaho Code § 41-1230, that a fine of \$25.00 per day, commencing April 1, 2015, to the date of entry of this Order of Default, for a total of Ten Thousand Five Hundred Dollars (\$10,500.00), is imposed against SCOTT WILLIAMS for failure to file the annual reports required by Idaho Code § 41-1228 for the years 2014 and 2015.

IT IS FURTHER ORDERED that an administrative penalty of \$500.00 is imposed against SCOTT WILLIAMS for failing to update his contact information including but not limited to providing his current business address and affiliation.

IT IS FURTHER ORDERED that Nonresident Surplus Lines Broker License No. 501650 issued to SCOTT WILLIAMS is REVOKED effective immediately.

IT IS FURTHER ORDERED that Nonresident Producer License No. 483910 issued to SCOTT WILLIAMS is REVOKED effective immediately.

IT IS FURTHER ORDERED, pursuant to Idaho Code § 41-1027(2), that SCOTT WILLIAMS shall immediately return Nonresident Surplus Lines Broker License No. 501650 and Nonresident Producer License No. 483910 to the Idaho Department of Insurance, P.O. Box 83720, Boise, Idaho 83720-0043.

IT IS SO ORDERED.

DATED this 25 day of May, 2016.

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 of which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the Idaho Department of Insurance's online searchable database. Be aware that you may be required to disclose this proceeding on any license application, and you may be required to report this action to any and all states in which you hold an insurance license.

### **NOTIFICATION OF RIGHTS**

This constitutes 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 petition for reconsideration within twenty-one (21) days of its receipt, or the petition will be considered denied by operation of law. *See* Idaho Code § 67-5246(4).

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order may appeal it by filing a petition for judicial review in the district court of the county in which: (1) the hearing was held; or (2) the final agency action was taken; or (3) the aggrieved party 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 decision is located. An appeal must be filed within twenty-eight (28) days of: (a) the service date of this final order, or (b) an order denying a petition for reconsideration, or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration, whichever is later. *See* Idaho Code § 67-5273. The filing of a petition for judicial review to the district court does not itself stay the effectiveness or enforcement of the order under appeal.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have, on this 26<sup>th</sup> day of May, 2016, caused a true and correct copy of the foregoing ORDER OF DEFAULT to be served upon the following by the designated means:

Scott Williams  
Target Insurance Services  
1230 E. Diehl Rd., Ste. 350  
Naperville, IL 60563-9365

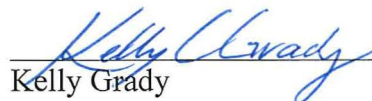
☒ first class mail  
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☐ via facsimile

Scott Williams  
604 S. Emerson Street  
Mount Prospect, IL 60056-3838

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Judy L. Geier  
Deputy Attorney General  
Idaho Department of Insurance  
700 W. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, ID 83720-0043

☐ first class mail  
☐ certified mail  
☒ hand delivery  
☐ via facsimile

  
\_\_\_\_\_  
Kelly Grady

LAWRENCE G. WASDEN  
Attorney General

JUDY L. GEIER, ISB No. 6559  
Deputy Attorney General  
Idaho Department of Insurance  
700 W. State Street  
P.O. Box 83720  
Boise, Idaho 83720-0043  
Telephone No. (208) 334-4204  
Facsimile No. (208) 334-4298  
[judy.geier@doi.idaho.gov](mailto:judy.geier@doi.idaho.gov)

**FILED**  
**APR 27 2016** *VL*  
Department of Insurance  
State of Idaho

*Attorneys for the Department of Insurance*

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

**STATE OF IDAHO**

In the Matter of:

**SCOTT WILLIAMS**

Nonresident Surplus Lines Broker License  
No. 501650 and Nonresident Producer  
License No. 483910

Docket No. 18-3158-16

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

COMES NOW the staff of the Idaho Department of Insurance (the "Department"), by and through its undersigned counsel, JUDY L. GEIER, 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:

**SCOTT WILLIAMS**

**Nonresident Surplus Lines Broker License No. 501650  
Nonresident Producer License No. 483910**

**EXHIBIT**

**A**

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 the verified Complaint, and, SCOTT WILLIAMS, you are further notified of your right to object to the requested relief, including the basis for any objection, and to request a hearing in writing.

### **ALLEGATIONS**

The allegations and violations supporting the requested relief are:

1. Idaho Code § 41-210 empowers the Director of the Idaho Department of Insurance (“Director”) to enforce the provisions of title 41, Idaho Code. As such, the Director has jurisdiction over this matter.

2. Scott Williams (“RESPONDENT”) is duly authorized by the State of Idaho as a nonresident surplus lines broker pursuant to license no. 501650 (“Surplus Broker License”) and as a nonresident producer pursuant to license no. 483910 (“Producer License”). RESPONDENT is therefore subject to title 41, Idaho Code, and to the rules of the Department.

3. RESPONDENT was granted nonresident surplus lines broker license no. 501650 effective September 26, 2014, pursuant to title 41, chapter 12, Idaho Code, which Surplus Broker License is scheduled to expire on June 30, 2016.

4. RESPONDENT was granted nonresident producer license no. 483910 effective April 25, 2014, pursuant to title 41, chapter 10, Idaho Code, which Producer License is scheduled to expire on June 30, 2016.

5. “Surplus Line Coverage” is defined as certain insurance products that cannot otherwise be procured from insurers authorized to do business within Idaho which are then allowed to be procured from unauthorized insurers subject to certain conditions delineated in Idaho Code

§ 41-1214.

6. Only surplus lines brokers licensed by Idaho and who are members of the Surplus Lines Association of Idaho (the “Association”) may procure Surplus Line Coverage for Idaho residents. Idaho Code § 41-1214(1); IDAPA Rule 18.01.17.011.01. Membership in the Association is a condition of maintaining a surplus lines broker license in Idaho.

7. Surplus lines brokers must file annual verified reports with the Department on or before March 1 of each year, detailing all of the surplus lines insurance transacted by the broker during the preceding year. Idaho Code § 41-1228. The annual verified report must be filed even if a surplus lines broker does zero surplus lines insurance business in Idaho in a given year.

8. Surplus lines brokers must also remit to the Department on or before March 1 of each year, a premium tax equivalent to one and five-tenths percent (1.5%) of the total premiums, less federal and state taxes and fees, received from the transaction of surplus lines insurance business during the preceding calendar year. Idaho Code § 41-1229.

9. The Association contacted RESPONDENT on December 3, 2015, via email to [licensing@CRCINS.com](mailto:licensing@CRCINS.com), which is the email address that he had supplied to the Department as his work email at CRC Insurance Services, Inc. (“CRC”). On December 3, 2015, the Association received a response email from CRC claiming that it no longer employed RESPONDENT. The Association then attempted to reach RESPONDENT through the telephone number that he had provided the Department; however, the number was disconnected. On December 4, 2015, the Association mailed an application to RESPONDENT.

10. On January 8, 2016, the Department also sent a letter to RESPONDENT at the home address that he provided, informing him of his obligation to register as a member of the Association; of the Association’s attempts to contact him regarding the same; and of the possibility

of revocation of his Idaho licenses for failing to join the Association.

11. To date, the Association has received no response from RESPONDENT.

12. RESPONDENT's annual reports are due to the Department on March 1 of each year. Since receiving his license, RESPONDENT has failed to submit **any report**. To date, RESPONDENT has neither filed an annual report nor paid premium tax for any surplus lines business transacted in Idaho.

#### **FIRST CAUSE OF ACTION**

##### **Failure to Register with the Approved Association Violation of Idaho Code § 41-1214(1); IDAPA 18.01.17.011**

13. The foregoing allegations in Paragraphs 1-12 are incorporated herein as if set forth in full.

14. Pursuant to Idaho Code § 41-1214(1), surplus lines of insurance coverage "must be procured through a licensed surplus lines broker who is a member of a surplus line association approved by the director." *See also* IDAPA 18.01.17.011.

15. RESPONDENT's failure to register with the Association as a nonresident surplus lines broker while obtaining and maintaining a surplus lines broker license constitutes attempting to transact and/or transacting surplus lines insurance business in violation of title 41, chapter 12, Idaho Code.

16. Pursuant to Idaho Code § 41-1016(1)(b), as incorporated by § 41-1224(1)(d), the Director may suspend or revoke a surplus lines broker's license where the licensee has violated any provision of title 41, Idaho Code, or Department rule.

17. Pursuant to Idaho Code § 41-1224(4), a surplus lines broker whose license has been suspended or revoked shall not again be licensed until any fines or delinquent taxes owed are paid and, in the case of revocation, not until the expiration of one (1) year from the date of final



revocation.

18. Idaho Code § 41-117 provides that the Director may impose an administrative penalty not to exceed one thousand dollars (\$1,000.00) for each violation of title 41, Idaho Code, for which a greater penalty is not set forth, and that each violation may be considered a separate offense.

19. The Department seeks an administrative penalty of One Thousand and 00/100 Dollars (\$1,000.00) and immediate revocation of RESPONDENT's Surplus Broker License.

**SECOND CAUSE OF ACTION**  
**Failure to File an Annual Report**  
**Violation of Idaho Code § 41-1228**

20. The foregoing allegations in Paragraphs 1-19 are incorporated herein as if set forth in full.

21. Pursuant to Idaho Code § 41-1228, each surplus lines broker must file, on or before March 1, a verified report with the Department of all surplus lines insurance transacted by him/her during the preceding calendar year. The report is due even if the surplus lines broker transacts zero surplus lines insurance business in a given year.

22. RESPONDENT failed to file an annual report on March 1 and to date remains delinquent in filing said report in violation of Idaho Code § 41-1228.

23. Pursuant to Idaho Code § 41-1230, a surplus lines broker who fails to file an annual report "shall be liable for a fine of twenty-five dollars (\$25.00) for each day of delinquency commencing with the first day of April" after such report is due.

24. Pursuant to Idaho Code § 41-1224(1)(a), the Director may suspend or revoke any surplus lines broker's license if the broker fails to file an annual report or to remit tax as required by law.

25. Pursuant to Idaho Code § 41-1224(4), a surplus lines broker whose license has been suspended or revoked shall not again be licensed until any fines or delinquent taxes owed are paid and, in the case of revocation, not until the expiration of one (1) year from the date of final revocation.

26. The Department seeks immediate revocation of RESPONDENT's Surplus Broker License.

27. The Department also seeks imposition against RESPONDENT of a fine of Twenty-Five and 00/100 Dollars (\$25.00) per day calculated from April 1, 2015, until the sooner of such date as RESPONDENT files the annual report and pays all taxes due, if any, or the date of final revocation of RESPONDENT's Surplus Broker License in accordance with Idaho Code § 41-1230.

**THIRD CAUSE OF ACTION**  
**Simultaneous Revocation of Nonresident Producer License**  
**Pursuant to Idaho Code § 41-1224(3) and (4)**

28. The foregoing allegations in Paragraphs 1-27 are incorporated herein as if set forth in full.

29. RESPONDENT holds a nonresident producer license issued by the State of Idaho.

30. Pursuant to Idaho Code § 41-1224(3), suspension or revocation of RESPONDENT's Surplus Broker License shall automatically suspend or revoke all other licenses held by RESPONDENT under title 41, Idaho Code, including RESPONDENT's nonresident producer license.

31. Pursuant to Idaho Code § 41-1224(4), reinstatement of a suspended or revoked surplus lines broker license cannot occur until any fines or delinquent taxes owed are paid and, in the case of revocation, not until the expiration of one (1) year from the date of final revocation.

32. As such, the Department also seeks revocation of RESPONDENT's Nonresident Producer License No. 483910 for a minimum of one (1) year from the date of final revocation or until such time as RESPONDENT would again be eligible for a surplus lines broker license in accordance with Idaho Code § 41-1224(4).

**FOURTH CAUSE OF ACTION**  
**Failure to Update Contact Information**  
**Violation of Idaho Code § 41-1008(6) and 1009(3)**

33. The foregoing allegations in Paragraphs 1-32 are incorporated herein as if set forth in full.

34. As a condition of licensing, all producers have a continuing obligation to update their contact information. Idaho Code §§ 41-1008(6) and 41-1009(3) require that resident and nonresident producers provide updated contact information within thirty (30) days of a change, such as a change of address or a change in business affiliation.

35. RESPONDENT has failed to inform the Department: a) that he is no longer affiliated with CRC; b) of his new affiliation, if any; and c) of his current business address, phone number, and email.

36. RESPONDENT's failure to provide current contact information is a violation of Idaho Code §§ 41-1008(6) and 1009 (3).

37. Pursuant to Idaho Code § 41-1016(1)(b), the Director may suspend or revoke a producer license and/or impose an administrative penalty not to exceed \$1,000 per violation for violating any provision of title 41, Idaho Code, including failure to notify the Department of a change of address or business affiliation.

38. As such, the Department also seeks an administrative penalty in the amount of Five

Hundred and 00/100 Dollars (\$500.00) against RESPONDENT for failing to update his contact information including failing to provide a current business address and affiliation.

### **REQUEST FOR RELIEF**

Based upon the foregoing facts and allegations, unless the Department receives a written objection from SCOTT WILLIAMS, that describes the basis for the objection and a demand for hearing, within twenty-one (21) days following service of this notice, the Department intends to submit a proposed order to the Director:

- imposing an administrative penalty of \$1,000.00 for failing to join the Surplus Lines Association of Idaho; and
- imposing an administrative penalty of \$25 per day commencing April 1, 2015, through the date that Respondent submits his annual reports for the years 2014 and 2015; and
- imposing an administrative penalty of \$500.00 for failing to update his contact information including but not limited to providing his current business address and affiliation; and
- revoking Nonresident Surplus Line Broker License No. 501650; and
- revoking Nonresident Producer License No. 483910.

### **NOTICE OF RIGHT TO OBJECT AND TO REQUEST A HEARING**

THEREFORE, based on violations as alleged above, SCOTT WILLIAMS, you have the right to have a hearing in accordance with Idaho Code § 41-232A. In order to effectively object to this notice and prevent an order for the requested relief from being entered, you must, within twenty-one (21) days of the date of issuance of this Verified Complaint and Notice of Right to Hearing, submit a written request for a hearing to the Director of the Idaho Department of Insurance, responding to the alleged violations pending against you. You must deliver any written

request for hearing by mailing it to the Director, Idaho Department of Insurance, P.O. Box 83720, Boise, Idaho 83720-0043, or personally delivering said written request to the offices of the Department of Insurance at 700 W. State Street, Third Floor, Boise, Idaho, and also providing a copy to the undersigned at the same address.

If you fail to submit a timely written response to the allegations and request for hearing, a final order will be entered imposing the relief described above after twenty-one (21) days from the issuance of this Complaint.

DATED this 30<sup>th</sup> day of April, 2016.

OFFICE OF THE ATTORNEY GENERAL

A handwritten signature in cursive script, reading "Judy L. Geier", is written over a horizontal line.

By: JUDY L. GEIER

Deputy Attorney General

Attorney for the Department of Insurance

VERIFICATION

STATE OF IDAHO   )  
                                      : ss.  
County of Ada        )

LISA TORDJMAN, for the Department of Insurance, State of Idaho, being first duly sworn, deposes and says:

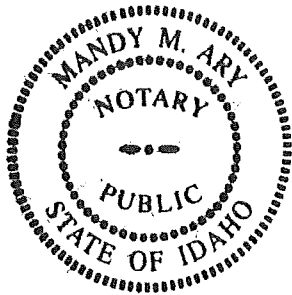
I have read the foregoing Verified Complaint and Notice of Right to Hearing and know the contents thereof, and the same are true to the best of my knowledge and belief and based on the records of the Department.

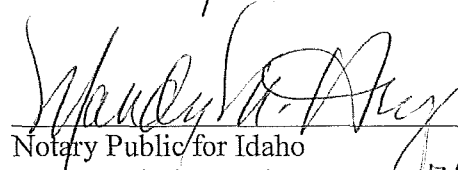
DATED this 26 day of April, 2016.



\_\_\_\_\_  
LISA TORDJMAN  
Supervisor, Producer Licensing  
IDAHO DEPARTMENT OF INSURANCE

SUBSCRIBED AND SWORN to before me this 26<sup>th</sup> day of April, 2016.



  
\_\_\_\_\_  
Notary Public for Idaho  
My commission expires on 07/24/18



**CERTIFICATE OF SERVICE**

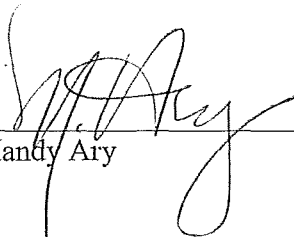
I HEREBY CERTIFY that I have, on this 27<sup>th</sup> day of April, 2016, and in compliance with Idaho Code § 41-232A, caused a true and correct copy of the foregoing VERIFIED COMPLAINT AND NOTICE OF RIGHT TO HEARING to be served upon the following by the designated means:

Scott Williams  
Target Insurance Services  
1230 E. Diehl Rd., Ste. 350  
Naperville, IL 60563-9365

- ☒ first class mail
- ☐ certified mail
- ☐ hand delivery
- ☐ via facsimile
- ☐ via email

Scott Williams  
604 S. Emerson Street  
Mount Prospect, IL 60056-3838

- ☒ first class mail
- ☐ certified mail
- ☐ hand delivery
- ☐ via facsimile
- ☐ via email

  
\_\_\_\_\_  
Mandy Ary