

LAWRENCE G. WASDEN
Attorney General

BRANDON KARPEN, ISB No. 7956
Deputy Attorney General
JOHN C. KEENAN, ISB No. 3873
Deputy Attorney General
State of Idaho
Department of Insurance
700 W. State Street, 3rd Floor
P.O. Box 83720
Boise, Idaho 83720-0043
Telephone: (208) 334-4250
Facsimile: (208) 334-4298

FILED AM
APR 20 2015
Department of Insurance
State of Idaho

Attorneys for the Department of Insurance

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

STATE OF IDAHO, DEPARTMENT OF
INSURANCE,

Complainant,

vs.

TAMERA ANDERSON, a resident insurance
producer holding Idaho license no. 305527,

Respondent.

Docket No. 18-3029-15

**ORDER OF DEFAULT REVOKING
IDAHO RESIDENT PRODUCER
LICENSE**

The Director of the Idaho Department of Insurance (Director) has reviewed the record in the above-captioned case. Respondent Tamera Anderson has been lawfully served with the Verified Complaint and Notice of Right to Hearing, a copy of which is attached hereto as Exhibit A. The Respondent has failed to file an answer to the Verified Complaint and has failed to request a hearing. Accordingly, having found that the Respondent has waived her rights regarding the opportunity for hearing,

IT IS HEREBY ORDERED that Idaho Resident Producer License No. 305527 issued to Tamera Anderson is hereby REVOKED. The Respondent shall immediately return Idaho Resident Producer License No. 305527 to the Idaho Department of Insurance, P.O. Box 83720, Boise, Idaho 83720-0043.

IT IS SO ORDERED.

DATED: April 20th, 2015.

STATE OF IDAHO
DEPARTMENT OF INSURANCE



THOMAS A. DONOVAN
Acting 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 this proceeding must be disclosed on any license application and must be reported 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

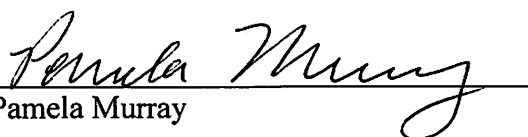
I HEREBY CERTIFY that I have, on this 20th day of April, 2015, caused a true and correct copy of the foregoing ORDER OF DEFAULT REVOKING IDAHO RESIDENT PRODUCER LICENSE to be served upon the following by the designated means:

Tamera Anderson
606 W. Fir St., Apt. 201
Shelley, ID 83274-1480

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

John C. Keenan
Deputy Attorney General
Idaho Department of Insurance
700 W. State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720-0043

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


Pamela Murray

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P.O. Box 83720
Boise, Idaho 83720-0043
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Attorneys for the Department of Insurance

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MAR 25 2015 *WMA*

Department of Insurance
State of Idaho

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

STATE OF IDAHO, DEPARTMENT OF
INSURANCE,

Complainant,

vs.

TAMERA ANDERSON, a resident insurance
producer holding Idaho license no. 305527,

Respondent.

Docket No. 18-3029-15

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

The Idaho Department of Insurance ("Department") complains and allege as follows:

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.

EXHIBIT

A

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. This action is brought pursuant to Idaho Code § 41-1016(1)(e), which prohibits a producer from “[m]isrepresenting the terms of an actual or proposed insurance contract or application for insurance or misrepresenting any fact material to any insurance transaction or proposed transaction.”

RESPONDENT

4. Tamara Anderson is an Idaho-licensed insurance producer, currently holding Idaho insurance producer license no. 305527. The license was issued December 29, 2008, and expires April 30, 2015. Department records reflect that Anderson’s address of record is in Shelley, Idaho.

FACTUAL ALLEGATIONS

5. In December 2012, Anderson obtained a loan from Farm Bureau Finance Company (“FBFC”).

6. Anderson used a 2007 Chevrolet Impala that she owned as collateral for the loan.

7. A condition of the loan agreement was that Anderson maintain insurance coverage on the 2007 Chevrolet Impala.

8. On January 10, 2013, FBFC contacted Anderson by email and requested that she submit proof of insurance coverage for the 2007 Chevrolet Impala, noting that if proper

documentation was not received by the next day, FBFC would force-place insurance coverage and charge the loan.

9. On January 10, 2013, in response to the FBFC request, Anderson submitted proof of coverage via a 60-day binder.

10. The 60-day binder listed a policy number of 01-B-192916-01, and showed a coverage period of January 4, 2013, through January 4, 2014. The 60-day binder included an electronic signature of Neil Jensen and was date-stamped January 10, 2013.

11. On March 11, 2013, FBFC contacted Anderson by email and requested an updated insurance binder for the 2007 Chevrolet Impala, noting that if proper documentation was not received, FBFC would force-place insurance coverage and charge the loan.

12. On March 11, 2013, in response to the FBFC request, Anderson submitted an updated binder. The updated binder listed a policy number of 01-B-192916-01, and showed a coverage period of March 6, 2013, through March 6, 2014. The updated binder included an electronic signature of Neil Jensen and was date-stamped March 11, 2013.

13. On about March 11, 2013, FBFC contacted Farm Bureau Insurance Underwriting to verify the information she received from Anderson. Farm Bureau Insurance Underwriting reported that Anderson did not have any insurance coverage for the 2007 Chevrolet Impala; the January 10, 2013, 60-day binder was forged; and the March 11, 2013, updated binder was also forged.

14. Upon further investigation, Farm Bureau Insurance Underwriting discovered that policy number 01-B-192916-01 was a policy that belonged to Anderson that had been canceled for non-payment in February 2011.

15. On May 9, 2013, the Department received notice that Anderson's appointment with Farm Bureau Mutual Insurance Company of Idaho was canceled for cause on the grounds that Anderson submitted false insurance binders on two occasions.

COUNT ONE: VIOLATION OF IDAHO CODE § 41-1016(1)(e)

16. Paragraphs 1-15 are re-alleged as if set forth in full.

17. Idaho Code § 41-1016(1)(e) prohibits a producer from "[m]isrepresenting the terms of an actual or proposed insurance contract or application for insurance or misrepresenting any fact material to any insurance transaction or proposed transaction."

18. When Anderson submitted the 60-day binder on January 10, 2013, she misrepresented the terms of an insurance transaction. Specifically, the 60-day binder reflected there was insurance coverage for a vehicle, when in fact there was no insurance coverage.

19. When Anderson submitted the updated binder on March 11, 2013, she misrepresented the terms of an insurance transaction. Specifically, the updated binder reflected there was insurance coverage for a vehicle, when in fact there was no insurance coverage.

20. Anderson violated Idaho Code § 41-1016(1)(e) on two separate occasions when she provided forged insurance binders to FBFC.

REQUEST FOR RELIEF

21. Idaho Code § 41-1016 provides that the Director has the authority to deny, suspend, or revoke a license and to impose an administrative penalty of \$1,000 upon a party who is found in violation of the Idaho insurance code.

22. Idaho Code § 41-117 makes clear that "each instance of violation may be considered a separate offense."

23. Based on the foregoing, the Department seeks an order from the Director imposing a penalty of \$2,000 (\$1,000 for the two violations of Idaho Code § 41-1016(1)(e)).

24. The Department further seeks an order from the Director revoking Anderson's insurance producer license.

NOTICE OF RIGHT TO A HEARING

Pursuant to Idaho Code § 41-232A, Respondent has 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 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).

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

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:

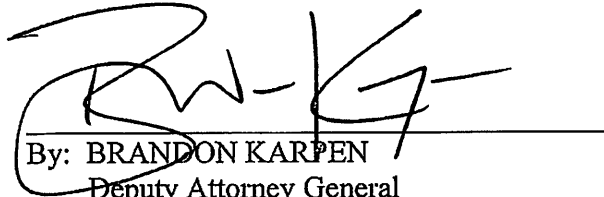
Brandon Karpen
John C. Keenan
Deputy Attorneys General
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

In lieu of a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241. Should you wish to discuss these

options, please contact the undersigned deputy attorney general. If Respondent fails 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.

DATED this 24th day of March, 2015.

OFFICE OF THE ATTORNEY GENERAL
STATE OF IDAHO

A handwritten signature in black ink, appearing to read 'B-K', is written over a horizontal line. The signature is stylized and somewhat abstract.

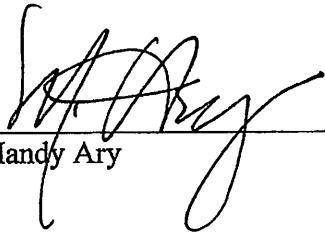
By: BRANDON KARPEN
Deputy Attorney General
Attorneys for the Department of Insurance

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have, on this 25th day of March, 2015, 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:

Tamera Anderson
606 W Fir St, Apt 201
Shelley, ID 83724-1480

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



Mandy Ary