

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NO.: 16249-AG17-0720-142

IN THE MATTER OF:

Casandra Watson  
10234 Heather Hills Road  
Indianapolis, IN 46229

)  
)  
)  
)  
)

**FILED**

JAN 05 2018

STATE OF INDIANA  
DEPT. OF INSURANCE

**FINAL ORDER**

On November 7, 2017, the Administrative Law Judge, Reuben B. Hill, filed his Findings of Fact, Conclusions of Law and Recommended Order in the above-captioned matter.

1. The Department served Findings of Fact, Conclusions of law, and Recommended Order on Respondent by mailing the same to her address of record.

2. The Department has complied with the notice requirements of Ind. Code §4-21.5-3-17.

3. Neither party has filed an objection with the Commissioner regarding the Administrative Law Judge's Findings of Fact, Conclusions of Law and Recommended Order, and more than eighteen (18) days have elapsed.

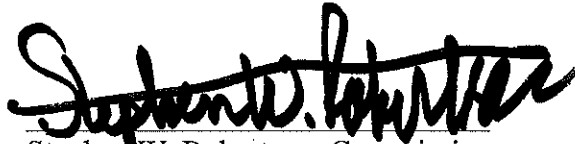
Therefore, the Commissioner of Insurance, being fully advised, now hereby adopts in full the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommended Order and issues the following Final Order:

IT IS THEREFORE ORDERED by the Commissioner of Insurance:

1. Respondent's resident license # 1000470 is permanently revoked effective immediately.

Under Ind. Code §4-21.5-5-5, Respondent has the right to appeal this Final Order by filing a petition for Judicial review in the appropriate court within thirty (30) days.

ALL OF WHICH IS ORDERED by the Commissioner this 5 day of January, 2018.



Stephen W. Robertson, Commissioner  
Indiana Department of Insurance

Copies to:

Casandra Watson  
10234 Heather Hills Road  
Indianapolis, IN 46229

Claire Szpara, Attorney  
Indiana Department of Insurance  
311 W. Washington St., Suite 103  
Indianapolis, IN 46204

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NUMBER: 16249-AG17-0720-142

IN THE MATTER OF: )  
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Casandra Watson )  
10234 Heather Hills Road )  
Indianapolis, Indiana 46229 )

Applicant. )

**FILED**

NOV 07 2017

STATE OF INDIANA  
DEPT. OF INSURANCE

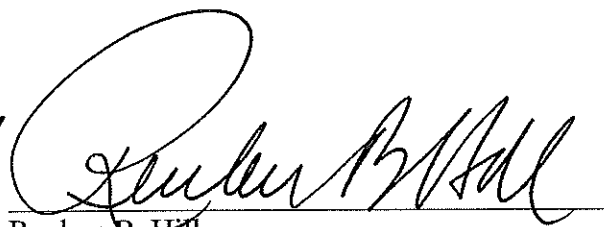
**NOTICE OF FILING OF RECOMMENDED ORDER**

The parties of this action are hereby notified that the Administrative Law Judge's Recommended Order is deemed filed as of this date.

To preserve an objection to this order for judicial review, you must object to the order in a writing that: 1) identifies the basis for your objection with reasonable particularity; and 2) is filed with the ultimate authority for the Final Order, the Commissioner of the Department of Insurance within eighteen (18) days from the date of this Order.

DATED:

November 7, 2017



Reuben B. Hill  
Administrative Law Judge

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

IN THE MATTER OF: )  
 )  
Casandra Watson )  
10234 Heather Hills Road )  
Indianapolis, Indiana 46229 )  
 )  
 )  
Respondent. )

**FILED**

NOV 07 2017

STATE OF INDIANA  
DEPT. OF INSURANCE  
CAUSE NO.: 16249-AG17-0720-142

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**FINDINGS OF FACT, CONCLUSIONS OF LAW  
AND RECOMMENDED ORDER**

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Administrative Law Judge Reuben B. Hill (“ALJ”), having heard, reviewed and considered all of the evidence, will now render a decision concerning the matter of Casandra Watson (“Applicant”). This matter came on to be heard by the ALJ on, October 3, 2017 at 10:00 a.m. at the Indiana Department of Insurance at 311 West Washington Street, Indianapolis, Indiana.

The Enforcement Division of the Indiana Department of Insurance (“Department”) was represented by counsel, Claire Szpara. Respondent did not appear. Evidence was heard and exhibits were received into evidence.

Based upon the evidence presented at said hearing, the ALJ now makes the following Findings of Fact, Conclusions of Law, and issues the Recommended Order.

## **FINDINGS OF FACT**

1. Respondent has been a Resident Producer since 2014.
2. Licensure, Respondent has been involved in four (4) Administrative Actions:
  - a. September 2015 License Revocation in the state of Kansas
  - b. December 2015 License Suspension in the state of Georgia
  - c. August 2016 License Revocation in the state of California and
  - d. December 2016 License Revocation in the state of Virginia
3. Respondent's Administrative Actions stem from her Termination For Cause from Golden Rule Insurance.
4. Respondent had taken credit or debit card payment information from consumers to pay premium, but substituted fictitious bank account routing and account numbers on dental insurance applications (Department's Exhibit 1).

## **CONCLUSIONS OF LAW**

1. The Commissioner of Insurance has jurisdiction over both the subject matter and the parties to this action.
2. This hearing was held in compliance with the Administrative Orders and Procedures Act of the Indiana Code.
3. Indiana Code 27-1-15.6-12(b) states that the Commissioner may permanently revoke an Insurance Producer License, due to a number of factors.
4. Indiana Code 27-1-15.6-12(b) specifically states that the Commissioner may permanently revoke and Insurance Producer License for violating and Insurance Law. Indiana Code 27-1-15.6-17(a) is an Insurance Law that states a Producer shall report to the

Commissioner any Administrative Action taken against the Producer in another jurisdiction or by another governmental agency in Indiana not more than thirty (30) days after the final disposition of the matter. Respondent's failure to notify the Department of her four (4) Administrative Actions within thirty (30) days is evidence of violating Indiana Code 27-1-15.6-12(b)(2)(A).

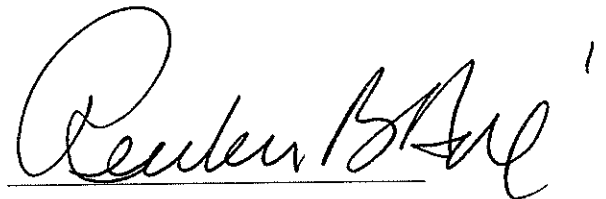
5. Indiana Code 4-21.5-3-14(c) states that the person requesting an Agency take action has the Burden of Persuasion and the Burden of Going Forward. The Department is requesting that the Commissioner permanently revoke Respondent's Resident Producer License.
6. The Department has met its burden of showing Respondent violated Indiana Code 27-1-15.6-12(b)(2)(a)

**RECOMMENDED ORDER**

In consideration of the foregoing Findings of Fact and the Conclusions of Law as stated, the Administrative Law Judge now recommends to the **Commissioner of Insurance** the following:

1. That Respondent's Resident License #1000470 be permanently revoked effective the date the Final Order is issued

**ALL OF WHICH IS ADOPTED** by the Administrative Law Judge and recommended to the **Commissioner of Insurance** this 27<sup>th</sup> day of November, 2017.



Reuben B. Hill, Esq.  
Administrative Law Judge

Distribution:

Casandra Watson  
10234 Heather Hills Road  
Indianapolis, Indiana 46229

Claire Szpara, Attorney  
Indiana Department of Insurance  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NO.: 16249-AG17-0720-142

IN THE MATTER OF: )

Casandra Watson )  
10234 Heather Hills Road )  
Indianapolis, IN 46229 )

**FILED**

OCT 25 2017

STATE OF INDIANA  
DEPT. OF INSURANCE

**PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW  
AND RECOMMENDED ORDER**

Administrative Law Judge (“ALJ”) Reuben Hill, having considered and reviewed all of the evidence, will now render a decision in the matter of Casandra Watson (“Respondent”). This matter came to be heard by the ALJ on October 3, 2017 at 10:00 a.m. at the Indiana Department of Insurance at 311 West Washington Street, Indianapolis, Indiana.

The Enforcement Division of the Indiana Department of Insurance (“Department”) was represented by counsel, Claire Szpara. Respondent did not appear. Evidence was heard and exhibits were received into evidence.

Based upon the evidence presented at said hearing, the ALJ now makes the following Findings of Fact, Conclusions of Law, and issues the Recommended Order.

**FINDINGS OF FACT**

1. Respondent has been a resident producer since 2014.
2. Since licensure, Respondent has been involved in four (4) administrative actions:
  - a. September 2015 license revocation in the state of Kansas;
  - b. December 2015 license suspension in the state of Georgia;
  - c. August 2016 license revocation in the state of California; and



d. December 2016 license revocation in the state of Virginia.

3. Respondent's administrative actions stem from her termination for cause from Golden Rule Insurance Company.

4. Respondent had taken credit or debit card payment information from consumers to pay premium but substituted fictitious bank account routing and account numbers on dental insurance applications (Department's Exhibit 1).

### CONCLUSIONS OF LAW

1. The Commissioner of Insurance has jurisdiction over both the subject matter and the parties to this action.

2. This hearing was held in compliance with the Administrative Orders and Procedures Act of the Indiana Code.

3. Indiana Code § 27-1-15.6-12(b) states that the Commissioner may permanently revoke an insurance producer license, due to a number of factors.

4. Specifically, Indiana Code § 27-1-15.6-12(b)(2)(A) allows the Commissioner to permanently revoke an insurance producer's license for violating an insurance law. Indiana Code § 27-1-15.6-17(a) is an insurance law that states a producer shall report to the Commissioner any administrative action taken against the producer in another jurisdiction or by another governmental agency in Indiana not more than thirty (30) days after the final disposition of the matter. Respondent's failure to notify the Department of her four (4) administrative actions within thirty (30) days is evidence of violating Indiana Code § 27-1-15.6-12(b)(2)(A).

5. Indiana Code § 4-21.5-3-14(c) states that the person requesting an agency take action has the burden of persuasion and the burden of going forward; here, the Department is requesting that the Commissioner permanently revoke Respondent's resident producer license and,

therefore, bears the burden. The Department has met its burden of showing Respondent violated Indiana Code § 27-1-15.6-12(b)(2)(A).

6. Findings of Fact that can be adopted as a Conclusion of Law are hereby incorporated herein as such.

**RECOMMENDED ORDER**

With the Findings of Fact and the Conclusions of Law as stated, the Administrative Law Judge now recommends to the Commissioner of Insurance the following:

1. That Respondent's resident license # 1000470 be permanently revoked effective the date the Final Order is issued.

ALL OF WHICH IS ADOPTED by the Administrative Law Judge and recommended to the Commissioner this \_\_\_\_\_ day of \_\_\_\_\_, 2017.

---

Reuben Hill  
Administrative Law Judge

Distribution:

Casandra Watson  
10234 Heather Hills Road  
Indianapolis, IN 46229

Claire Szpara, Attorney  
Indiana Department of Insurance  
311 W. Washington St., Suite 103  
Indianapolis, IN 46204

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE  
CAUSE NO.: 16249-AG17-0720-142

IN THE MATTER OF: )  
 )  
Casandra Watson )  
10234 Heather Hills Road )  
Indianapolis, IN 46229 )  
 )  
Respondent. )  
 )  
License Number: 1000470 )  
 )  
Type of Action: Enforcement )

**FILED**  
AUG 29 2017  
STATE OF INDIANA  
DEPT. OF INSURANCE

**NOTICE OF HEARING**

Notice is hereby given, pursuant to Indiana Code § 4-21.5-3 *et seq.*, that an evidentiary hearing will be held on October 3, 2017, at 10:00 ~~(A.M.)~~ P.M. Eastern Time, at 311 West Washington Street, Suite 103, Indianapolis, Indiana, to determine whether to revoke Respondent's resident producer's license.

The hearing will be conducted in accordance with the provisions of the Administrative Orders and Procedures Act, codified at Indiana Code § 4-21.5-3 *et seq.* The Commissioner's authority to deny an insurance producer's license application is contained in Indiana Code § 27-1-15.6-12(b).

The issues to be resolved at the hearing are those described in the Statement of Charges.  
The Indiana Department of Insurance ("Department") asserts that Respondent has violated Indiana Code § 27-1-15.6-12(b)(2)(A), due to having four (4) administrative actions not reported to the Department within the statutory time frame stated in Indiana Code § 27-1-15.6-17(a).

In accordance with Indiana Code § 27-1-15.6-34, the Administrative Law Judge in this matter is:

Reuben B. Hill

Indiana Department of Insurance  
311 West Washington Street - Suite 103  
Indianapolis, Indiana 46204-2787  
Telephone: 317/232-3520

The Department of Insurance will be represented by its counsel, Claire Szpara, who can be reached at:

Indiana Department of Insurance  
311 West Washington Street - Suite 103  
Indianapolis, Indiana 46204-2787  
Telephone: 317-232-5312

A party who fails to attend or participate in a pre-hearing conference, hearing or other later stage of the proceeding, may be held in default or have a proceeding dismissed under Indiana Code § 4-21.5-3-24.

Dated:

Aug 29, 2017

Reuben B Hill

Administrative Law Judge  
Indiana Department of Insurance

This Notice has been sent to:

Casandra Watson  
10234 Heather Hills Road  
Indianapolis, IN 46229

Taylor Peycha, Insurance Investigator  
Indiana Department of Insurance  
311 West Washington St., Suite 103  
Indianapolis, IN 46204-2787

STATE OF INDIANA )  
 ) SS:  
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BEFORE THE INDIANA  
COMMISSIONER of INSURANCE

CAUSE NUMBER: 16249-AG17-0720-142

IN THE MATTER OF: )

Casandra Watson )  
10234 Heather Hills Road )  
Indianapolis, IN 46229 )

Respondent. )

License Number: 1000470 )

Type of Action: Enforcement )

**FILED**

AUG 29 2017

STATE OF INDIANA  
DEPT. OF INSURANCE

**STATEMENT OF CHARGES**

The Enforcement Division of the Indiana Department of Insurance (“Department”), by counsel, Claire Szpara, pursuant to the Indiana Administrative Orders and Procedures Act, Indiana Code § 4-21.5 *et seq.*, files its Statement of Charges against Cassandra Watson (“Respondent”), as follows:

**FACTS**

1. Respondent was issued Indiana resident producer license number 1000470 on November 19, 2014. (“Respondent’s license”).
2. On April 20, 2017, the Department received an application for additional qualifications for Respondent’s license.
3. Respondent’s April 20, 2017 application was denied due to her failure to disclose the following administrative actions:
  - a. A November 21, 2015 Order of Revocation by the State of Kansas;
  - b. A December 2, 2015 Order of License Suspension by the State of Georgia;
  - c. An August 30, 2016 Order of Summary Revocation by the State of California; and

- d. A December 16, 2016 Order of Revocation by the Commonwealth of Virginia.
4. Respondent failed to report the other states' actions within the statutory time frame.

**CHARGES**

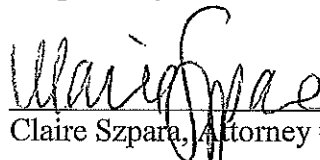
**COUNT I**

5. Averments 1 through 4 are incorporated fully herein by reference.
6. Indiana Code § 27-1-15.6-12(b)(2)(A) states the Commissioner may revoke an insurance producer license for violating an insurance law. Indiana Code § 27-1-15.6-17(a) is an insurance law that states a producer shall report to the Commissioner any administrative action taken against the producer in another jurisdiction or by another governmental agency in Indiana not more than thirty (30) days after the final disposition of the matter.
7. The Department alleges Respondent violated Indiana Code § 27-1-15.6-12(b)(2)(A) by not reporting the four (4) administrative actions taken within the statutory time frame as stated in Indiana Code § 27-1-15.6-17(a).

**WHEREFORE**, the Enforcement Division of the Indiana Department of Insurance, by counsel, Claire Szpara, requests that the Commissioner of Insurance:

- (1) Issue an order permanently revoking Respondent's insurance producer license;
- (2) Set this matter for a hearing pursuant to Indiana Code § 4-21.5; and
- (3) Issue all other relief necessary and proper upon the premise.

Respectfully submitted,

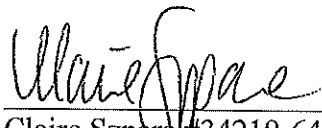
  
\_\_\_\_\_  
Claire Szpara, Attorney #34219-64

Claire Szpara, Attorney  
Indiana Department of Insurance  
Enforcement Division  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787  
Telephone: (317) 232-5312  
Facsimile: (317) 232-5251

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been served upon the following Respondent by United States first class mail, postage prepaid, this 29 day of August, 2017.

Casandra Watson  
10234 Heather Hills Road  
Indianapolis, IN 46229



\_\_\_\_\_  
Claire Szpara #34219-64  
Attorney, Enforcement Division