

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NO.: 16755-AD18-0706-056

IN THE MATTER OF: )  
 )  
Angela Petts )  
12434 Red Gate Rd. )  
Evansville, IN 47725 )  
 )  
Respondent. )  
 )  
Type of Agency Action: Enforcement )  
 )  
License Number: 1511740 )

**FILED**  
DEC 17 2018  
STATE OF INDIANA  
DEPT. OF INSURANCE

**FINAL ORDER VACATING NONRENEWAL  
AND ADOPTING AGREED ENTRY**

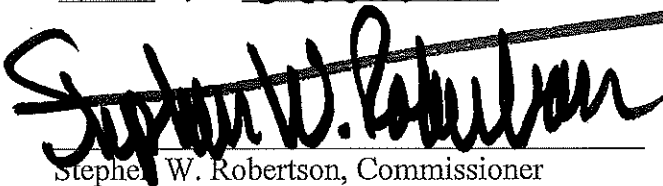
The Indiana Department of Insurance (“Department”), by counsel, Erica J. Dobbs, and Angela Petts (“Respondent”), a licensed resident producer, signed an Agreed Entry which purports to resolve all issues involved in the above-captioned cause number, and which has been submitted to the Commissioner of Indiana Department of Insurance (“Commissioner”) for approval.

The Commissioner, after reviewing the Agreed Entry, which places Respondent on probation for two (2) years and requires her to take six (6) hours of additional ethics training within six (6) months of issuance of this order for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Indiana or elsewhere, finds it has been entered into fairly and without fraud, duress or undue influence, and is fair and equitable between the parties. The Commissioner hereby incorporates the Agreed Entry, attached, as if fully set forth herein, and approves and adopts in full the Agreed Entry as a resolution of this matter.

IT IS THEREFORE ORDERED by the Commissioner of Insurance:

1. The Order of Nonrenewal issued on July 13, 2018 against Respondent's resident producer license number 1511740 is hereby vacated.
2. Respondent's license shall be renewed, and Respondent placed on probation for a period of two (2) years, during which time any violation of Title 27 of the Indiana Code will result in the Department seeking immediate revocation of Respondent's license.
3. Respondent shall take six (6) hours of additional ethics training within the first six (6) months after the issuance of this Final Order and provide proof of completion to the Department.

ALL OF WHICH IS ORDERED this 17 day of December, 2018.

  
Stephen W. Robertson, Commissioner  
Indiana Department of Insurance

Distribution:

Erica J. Dobbs, Attorney  
ATTN: Melissa Higgins, Sr. Investigator  
**INDIANA DEPARTMENT OF INSURANCE**  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787

Angela Petts  
c/o John Morse, Counsel for Respondent  
MORSE AND BICKEL, PC  
320 North Meridian Street, Suite 600  
Indianapolis, IN 46204

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
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CAUSE NO.: 16755-AD18-0706-056

IN THE MATTER OF: )

Angela Petts )  
12434 Red Gate Rd. )  
Evansville, IN 47725 )

Respondent. )

Type of Agency Action: Enforcement )

License Number: 1511740 )

**FILED**

DEC 17 2018

STATE OF INDIANA  
DEPT. OF INSURANCE

AGREED ENTRY

This Agreed Entry is executed by and between the Enforcement Division of the Indiana Department of Insurance ("Department"), by counsel, Erica J. Dobbs, and Angela Petts ("Respondent"), to resolve all issues in the above-captioned cause number. This Agreed Entry is subject to the review and approval of Stephen W. Robertson, Commissioner of the Indiana Department of Insurance ("Commissioner").

WHEREAS, Respondent was a licensed resident insurance producer, holding license number 1511740 since December 5, 1981;

WHEREAS, on or about February 28, 2018, the Department was notified Respondent had been terminated for cause from Transamerica, due to Respondent having submitted applications and/or policy changing documents, with what appeared to be duplicated or inconsistent signatures;

WHEREAS, Respondent's license expired on June 30, 2018;

WHEREAS, on or about July 13, 2018, the Department filed an Order of Nonrenewal against Respondent's producer license due to her termination for cause from Transamerica;

WHEREAS, since the filing of the Order of Nonrenewal, additional evidence has come to light negating and/or mitigating the original allegations against Respondent;

WHEREAS, Indiana Code § 27-1-15.6-12(b)(8) states, in part, that the Commissioner may place a producer on probation for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Indiana or elsewhere;

WHEREAS, the Department and Respondent (collectively, the "Parties") desire to resolve this matter without the necessity of a hearing.

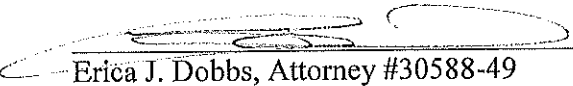
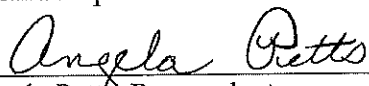
IT IS, THEREFORE, NOW AGREED by and between the Parties as follows:

1. The Commissioner has jurisdiction over the subject matter and the Parties to this Agreed Entry.
2. This Agreed Entry is executed voluntarily by the Parties.
3. Respondent voluntarily and freely waives the right to a public hearing on the issues in this matter.
4. Respondent voluntarily and freely waives the right to judicial review of this matter.
5. The Department shall vacate the Order of Nonrenewal entered against Respondent on July 13, 2018.
6. Respondent's license renewal application shall be approved, and Respondent placed on probation for a period of two (2) years, beginning the date the Commissioner enters the Final Order adopting this Agreed Entry.
7. During the probationary period any violation of Title 27 of the Indiana Code will result in the Department seeking immediate revocation of Respondent's license.

8. Respondent shall take six (6) additional hours of ethics training within the first six (6) months following the date the Commissioner enters the Final Order adopting this Agreed Entry and provide proof of completion to the Department.
9. The Department agrees to accept Respondent's compliance with this agreement as full satisfaction of this matter.
10. Respondent has carefully read and examined this agreement and fully understands its terms.
11. Respondent has entered into this agreement freely, and has not been subject to duress, threat or undue influence.
12. Should this Agreed Entry not be accepted by the Commissioner, it is agreed that presentation to and consideration of this Agreed Entry by the Commissioner shall not unfairly or illegally prejudice the Commissioner from further participation in or resolution of these proceedings.
13. Respondent is aware that failure to comply with any of the terms of this agreement will result in the matter being set for a hearing.
14. Should additional violations manifest, further administrative actions will be taken for the new violation(s).

12/10/18  
Date Signed

12-5-18  
Date Signed

  
Erica J. Dobbs, Attorney #30588-49  
Indiana Department of Insurance  
  
Angela Petts, Respondent

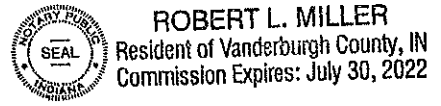
STATE OF INDIANA )  
 )  
COUNTY OF Vanderburgh ) SS:

Before me a Notary Public for Vanderburgh County, State of Indiana, personally appeared Angela Petts, and being first duly sworn by me upon her oath, says that the facts alleged in the foregoing instrument are true.

Signed and sealed this 5<sup>th</sup> day of December, 2018.

Robert L. Miller  
Signature  
Robert L. Miller  
Printed

My Commission expires: July 30, 2022  
County of Residence: Vanderburgh



**Return executed originals to:**  
INDIANA DEPARTMENT OF INSURANCE  
Enforcement Division, Suite 103  
311 West Washington Street  
Indianapolis, IN 46204-2787  
317/234-5883 - telephone  
317/234-5882 - facsimile

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE  
  
CAUSE NO.: 16755-AD18-0806-056

IN THE MATTER OF: )  
 )  
Angela Petts )  
12434 Red Gate Rd. )  
Evansville, IN 47725 )  
 )  
Applicant. )  
 )  
License Number: 1511740 )  
 )  
Type of Agency Action: Enforcement )

**FILED**

OCT 12 2018

STATE OF INDIANA  
DEPT. OF INSURANCE

NOTICE OF NEW HEARING

This matter came on for Pre-Hearing Conference on October 4, 2018 at 9:30 A.M. and a case management plan was determined.

Notice is hereby given, pursuant to Indiana Code § 4-21.5-3 *et seq.*, that an Evidentiary Hearing will be held on **January 9, 2019, at 10:00 A.M. Eastern Time**, at 311 West Washington Street, Suite 103, Indianapolis, Indiana, to determine whether to grant Respondent's request to renew her nonresident 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 refuse to renew an insurance agent's license is contained in Indiana Code § 27-1-15.6-12(b).

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

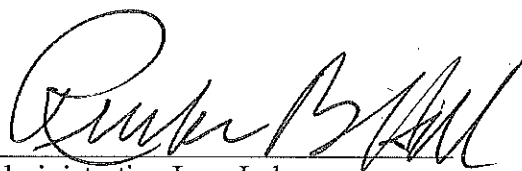
Reuben B. Hill  
Indiana Department of Insurance  
311 West Washington Street - Suite 103  
Indianapolis, Indiana 46204-2787  
Telephone: 317/232-3520

The Department of Insurance will be represented by its counsel, Erica J. Dobbs, who can be reached at:

Indiana Department of Insurance  
311 West Washington Street - Suite 103  
Indianapolis, Indiana 46204-2787  
Telephone: 317/234-5887

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: 10/12/18

  
Administrative Law Judge  
Indiana Department of Insurance

This Notice has been sent to:

John Morse, Attorney for Respondent  
MORSE & BICKEL, P.C.  
320 N. Meridian Street, Suite 600  
Indianapolis, IN 46204

Erica J. Dobbs, Attorney  
ATTN: Melissa Higgins, Insurance Investigator  
Indiana Department of Insurance  
311 West Washington St., Suite 103  
Indianapolis, IN 46204-2787



STATE OF INDIANA ) BEFORE THE INDIANA  
 ) SS: COMMISSIONER OF INSURANCE  
COUNTY OF MARION ) CAUSE NO. 16755-AD18-0706-056

IN THE MATTER OF: )  
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12434 Red Gate Rd )  
Evansville, IN 47725 )  
 )  
Respondent. )  
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Type of Agency Action: Enforcement )  
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License Number: 1511740 )

**FILED**

SEP 19 2018

STATE OF INDIANA  
DEPT. OF INSURANCE

**MOTION TO CONVERT HEARING**

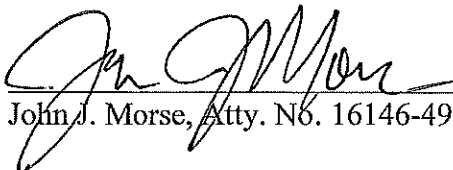
Respondent, Angela Petts (“Respondent”), by counsel, hereby respectfully files her MOTION TO CONVERT HEARING in this matter and states the following in support:

1. On, September 5, 2018, the Administrative Judge for the Indiana Department of Insurance (“IDOI”) scheduled an evidentiary hearing for September 27, 2018.
2. Counsel for Respondent received several hundred pages of documents regarding this matter from counsel for IDOI on September 11, 2018, and the undersigned counsel needs time to review the documents and to determine what steps are necessary to prepare for the hearing.
3. The undersigned counsel respectfully requests that the evidentiary hearing set for September 27, 2018, at 11:00 A.M. be converted to a pre-hearing conference, where the parties can confer regarding future hearing dates and deadlines.
4. Counsel for the IDOC does not object to the relief requested herein.

WHEREFORE, Respondent, Angela Petts, respectfully requests the Court grant her Motion; to convert the evidentiary hearing set for September 27, 2018, at 11:00 A.M. to a pre-hearing conference; and to grant her all other relief just and proper in the premises.

Respectfully submitted,

MORSE & BICKEL, P.C.



John J. Morse, Atty. No. 16146-49

*Attorneys for Respondent, Angela Petts*

MORSE & BICKEL, P.C.  
320 N. Meridian Street  
Suite 600  
Indianapolis, IN 46204  
Phone: (317) 686-1540  
Fax: (317) 686-1541  
[Morse@MorseBickel.com](mailto:Morse@MorseBickel.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served to the following party via U.S. First-Class mail, this 12<sup>th</sup> day of September, 2018:

Erica J. Dobbs, Esq.  
Attn: Melissa Higgins, Insurance Investigator  
Indiana Department of Insurance  
311 W. Washington Street  
Suite 103  
Indianapolis, IN 46204-2787



John J. Morse

MORSE & BICKEL, P.C.  
320 N. Meridian Street  
Suite 600  
Indianapolis, IN 46204  
Phone: (317) 686-1540  
Fax: (317) 686-1541  
[Morse@MorseBickel.com](mailto:Morse@MorseBickel.com)

STATE OF INDIANA )  
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COUNTY OF MARION ) CAUSE NO. 16755-AD18-0706-056

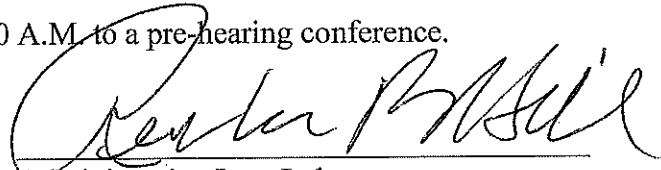
IN THE MATTER OF: )  
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Angela Petts )  
12434 Red Gate Rd )  
Evansville, IN 47725 )  
 )  
Respondent. )  
 )  
Type of Agency Action: Enforcement )  
 )  
License Number: 1511740 )

**FILED**  
SEP 19 2018  
STATE OF INDIANA  
DEPT. OF INSURANCE

**ORDER GRANTING MOTION TO CONVERT HEARING**

This matter is before the Indiana Commissioner of Insurance on the Motion to Convert Hearing filed by Respondent, Angela Petts. The Commissioner hereby converts the evidentiary hearing set for September 27, 2018, at 11:00 A.M. to a pre-hearing conference.

Dated: 9/19/18

  
\_\_\_\_\_  
Administrative Law Judge  
Indiana Department of Insurance

**Distribution:**

John J. Morse, Esq.  
MORSE & BICKEL, P.C.  
320 N. Meridian Street  
Suite 600  
Indianapolis, IN 46204

Erica J. Dobbs, Esq.  
Attn: Melissa Higgins, Insurance Investigator  
Indiana Department of Insurance  
311 W. Washington Street  
Suite 103  
Indianapolis, IN 46204-2787

STATE OF INDIANA )  
 ) SS:  
COUNTY OF MARION )

BEFORE THE INDIANA  
COMMISSIONER OF INSURANCE

CAUSE NO.: 16755-AD18-0806-056

IN THE MATTER OF: )

Angela Petts )  
12434 Red Gate Rd. )  
Evansville, IN 47725 )

Applicant. )

License Number: 1511740 )

Type of Agency Action: Enforcement )

**FILED**

SEP 05 2018

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 September 27, 2018, at 11:00 Eastern Time at 311 West Washington Street, Suite 103, Indianapolis, Indiana 46204-2787, to determine whether to grant Respondent's request for renewal of her 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 regarding agent licensing is contained in Indiana Code § 27-1-15.6-12(b).

The issues to be resolved at the hearing are those described in the Administrative Order Notice of Nonrenewal of Licensure filed on July 13, 2018.

The Indiana Department of Insurance asserts that Respondent has violated Indiana Code §§ 27-1-15.6-12(b)(8) and 27-1-15.6-12(b)(10), for having been terminated for cause for forging applications for insurance, forging documents to change owners/beneficiaries on policies, and duplicating or forging signatures on documents.

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) 232-2387

The Department of Insurance will be represented by its counsel, Erica J. Dobbs, who can be reached at:

Indiana Department of Insurance  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787  
Telephone: (317) 234-5887

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 Section 4-21.5-3-24.

Dated: 9-5-18

Reuben B. Hill

Administrative Law Judge  
Indiana Department of Insurance

Distribution:

Erica J. Dobbs, Attorney  
ATTN: Melissa Higgins, Sr. Insurance Investigator  
Indiana Department of Insurance  
311 W. Washington St., Suite 103  
Indianapolis, IN 46204-2787

Angela Petts  
12434 Red Gate Rd.  
Evansville, IN 47725

John J. Morse  
Morse & Bickel, P.C.  
320 N. Meridian St., Ste. 600  
Indianapolis, IN 46204

STATE OF INDIANA ) BEFORE THE INDIANA  
 ) SS: COMMISSIONER OF INSURANCE  
COUNTY OF MARION ) CAUSE NO. 16755-AD18-0706-056

IN THE MATTER OF: )  
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12434 Red Gate Rd )  
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Respondent. )  
 )  
Type of Agency Action: Enforcement )  
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License Number: 1511740 )

**REQUEST FOR HEARING**

Respondent, Angela Petts (“Respondent”), by counsel, hereby respectfully files her REQUEST FOR HEARING in this matter and states the following in support:

1. The Indiana Department of Insurance (“Department”) filed its ADMINISTRATIVE ORDER NOTICE OF NONRENEWAL OF LICENSE on July 13, 2018.
2. Pursuant to Indiana Code § 27-1-15.6-12(d), Respondent hereby requests this matter be set for a hearing to determine the reasonableness of this action.

Respectfully submitted,

MORSE & BICKEL, P.C.

  
\_\_\_\_\_  
John J. Morse, Atty. No. 16146-49

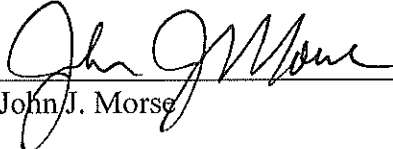
*Attorneys for Respondent, Angela Petts*

MORSE & BICKEL, P.C.  
320 N. Meridian Street  
Suite 600  
Indianapolis, IN 46204  
Phone: (317) 686-1540  
Fax: (317) 686-1541  
[Morse@MorseBickel.com](mailto:Morse@MorseBickel.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served to the following party via U.S. First-Class mail, this 27<sup>th</sup> day of August, 2018:

Erica J. Dobbs, Esq.  
Attn: Melissa Higgins, Insurance Investigator  
Indiana Department of Insurance  
311 W. Washington Street  
Suite 103  
Indianapolis, IN 46204-2787

  
\_\_\_\_\_  
John J. Morse

MORSE & BICKEL, P.C.  
320 N. Meridian Street  
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Indianapolis, IN 46204  
Phone: (317) 686-1540  
Fax: (317) 686-1541  
[Morse@MorseBickel.com](mailto:Morse@MorseBickel.com)

STATE OF INDIANA )  
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BEFORE THE INDIANA  
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CAUSE NUMBER: 16755-AD18-0706-056

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12434 Red Gate Rd )  
Evansville, IN 47725 )

Respondent. )

Type of Agency Action: Enforcement )

License Number: 1511740 )

**FILED**

JUL 13 2018

STATE OF INDIANA  
DEPT. OF INSURANCE

**ADMINISTRATIVE ORDER**  
**NOTICE OF NONRENEWAL OF LICENSE**

The Indiana Department of Insurance ("Department"), pursuant to Indiana Code § 4-21.5 *et seq.*, and Indiana Code § 27-1-15.6-12, hereby gives notice to Angela Petts, ("Respondent") of the following Administrative Order:

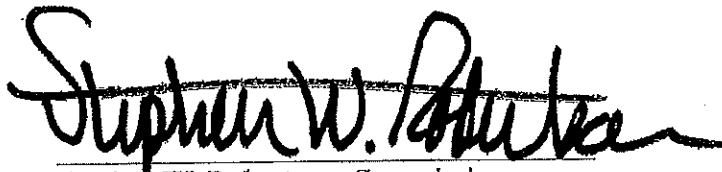
1. Respondent is a licensed resident insurance producer holding license number 1511740 since December 5, 1981.
2. Respondent's license expired on June 30, 2018.
3. On or about February 28, 2018, the Department was notified Respondent had been terminated for cause from Transamerica.
4. The reason for the termination for cause from Transamerica was due to Respondent having submitted multiple applications and policy-changing documents, including owner changes and beneficiary changes, without the owner/insured's authorization and with duplicated or inconsistent signatures.



5. Indiana Code § 27-1-15.6-12(b)(8) provides, in part, that the Commissioner may refuse to renew an insurance producer's license for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Indiana or elsewhere.
6. Indiana Code § 27-1-15.6-12(b)(10) provides, in part, that the Commissioner may refuse to renew an insurance producer's license for forging another's name to an application for insurance or to any document related to an insurance transaction.
7. The Commissioner further notifies Respondent that, pursuant to Indiana Code § 27-1-15.6-12(d), Respondent may, within sixty-three (63) days of the mailing of this Order, make a written demand upon the Commissioner for a hearing to determine the reasonableness of this action. Such a hearing shall be held within thirty (30) days from the date of receipt of Respondent's written demand.

WHEREFORE, based on the foregoing, the Commissioner of Insurance hereby notifies Respondent that **her license shall not be renewed** for having been terminated for cause for forging applications for insurance, forging documents to change owners/beneficiaries on policies, and duplicating or forging signatures on documents; all of which is in violation of Indiana Codes §§ 27-1-15.6-12(b)(8), and § 27-1-15.6-12(b)(10).

July 13, 2018  
Date Signed

  
Stephen W. Robertson, Commissioner.  
Indiana Department of Insurance

Distribution:

Erica J. Dobbs, Attorney  
ATTN: Melissa Higgins, Insurance Investigator  
Indiana Department of Insurance  
311 West Washington Street, Suite 103  
Indianapolis, Indiana 46204-2787

Angela Petts  
12434 Red Gate Rd.  
Evansville, IN 47725