

STATE OF INDIANA)
) SS:
 COUNTY OF MARION)
 IN THE MATTER OF:)
)
 Pamela Brown)
 11124 Running Pine Dr.)
 Riverview, FL 33569)
)
 Respondent.)
)
 Type of Agency Action: Enforcement)
)
 License Number: 3441070)

BEFORE THE INDIANA
 COMMISSIONER OF INSURANCE
 CAUSE NO: 21361-AD22-0414-049

FILED
 JUN 14 2022
 STATE OF INDIANA
 DEPT. OF INSURANCE

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

The Indiana Department of Insurance (“Department”), pursuant to the Indiana Administrative Orders and Procedures Act, Indiana Code § 4-21.5-1 *et seq.*, and Indiana Code § 27-1-15.6-12, hereby gives notice to Pamela Brown (“Respondent”) of the following Administrative Order:

1. Respondent is a licensed nonresident insurance producer holding license number 3441070 (“Respondent’s license”) since May 20, 2019.
2. Respondent’s license expires on April 30, 2022.
3. On or around October 29, 2021, Respondent was terminated for cause by United Services Automobile Association “USAA” for using dishonest practices in the conduct of business in Indiana.
4. It had been discovered Respondent had failed to comply with the USAA’s sales practice procedures by failing to obtain express consent for providing customers separate policies which caused Respondent to engage in deceptive sales practices.

5. Respondent entered into a settlement agreement in the State of Virginia on March 3, 2022, to surrender her license.
6. Respondent failed to notify the Department of the administrative action within thirty (30) days of the action.
7. Indiana Code § 27-1-15.6-12(b)(7) states, in part, that the Commissioner may refuse to renew an insurance producer license for admitting to having committed or being found to have committed any unfair trade practice or fraud in the business of insurance.
8. Indiana Code § 27-1-15.6-12(b)(8) states, in part, that the Commissioner may refuse to renew an insurance producer license for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Indiana or elsewhere.
9. Indiana Code § 27-1-15.6-12(b)(2)(A) states, in part, that the Commissioner may refuse to renew an insurance producer license for violating an insurance law.
10. Indiana Code § 27-1-15.6-17(a) is an insurance law that states that not more than thirty days after the final disposition of the matter, a producer shall report to the Commissioner any administrative action taken against the producer initiated in any jurisdiction or governmental agency.
11. Indiana Code § 27-1-15.6-12(d) provides that when the Commissioner refuses to renew a license, the Commissioner shall notify the Respondent, in writing, of the reasons for the nonrenewal. This Order serves as that notice.
12. 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.

13. This is considered an agency action. This action has been initiated by the aforementioned authority. If you choose to appeal this agency action, the State of Indiana Office of Administrative Law Proceedings ("OALP") will assign an administrative law judge to preside over this matter, and subsequently you will be contacted by the OALP with more information to begin the administrative process.

WHEREFORE, based on the foregoing, the Commissioner of Insurance hereby notifies Respondent that **Respondent's license shall not be renewed** due to the nature of Respondent's termination for cause, which involved dishonest practices, and for Respondent's failure to timely report an administrative action.

6/14/22
Date Signed

Amy L. Beard
Amy L. Beard, Commissioner
Indiana Department of Insurance

Distribution:

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