

BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF)	
)	Division Case No. 117416
)	
RYAN CHASE JENNISON,)	
NPN 19611264,)	ORDER AND CONSENT TO ORDER
DOB 09/08/XXXX,)	
)	
Respondent.)	

NOW THEREFORE, upon motion of the Iowa Insurance Division (“Division”) and by the consent of Respondent, Ryan Chase Jennison, pursuant to the provisions of Iowa Code chapter 522B—Licensing of Insurance Producers, the Commissioner enters the following Order and Consent to Order (“Consent Order”):

I. PARTIES AND JURISDICTION

1. The Commissioner of Insurance, Douglas M. Ommen, directly and through his designees, administers and enforces Iowa Code chapter 522B—Licensing of Insurance Producers pursuant to Iowa Code § 505.8.
2. Ryan Chase Jennison (“Jennison”) is an individual with a registered residential address of 9608 NW 7th Cir., Apt. 1311, Plantation, FL 33324. On information and belief, Jennison currently resides at 540 SW 63rd Ave, Margate, FL, 33068.
3. Jennison is and has been licensed in the state of Iowa as a nonresident insurance producer since September 8, 2021. Jennison is licensed under National Producer Number 19611264.
4. Pursuant to Iowa Code § 505.28, Jennison consented to the jurisdiction of the Commissioner of Insurance by committing acts governed by chapter 522B.
5. From on or about October 19, 2022, to present, Jennison engaged in acts and practices within the state of Iowa constituting cause for probation, suspension, or revocation of Jennison’s

insurance producer license; cease and desist orders; and civil penalties or other relief under Iowa Code chapters 505, 522B, and rules adopted pursuant to these chapters.

II. FINDINGS OF FACT

6. Jennison applied for a nonresident insurance producer license with the Division by submitting a Uniform Application for Individual Producer License (“Uniform Application”) through the National Insurance Producer Registry. In submitting the Uniform Application, Jennison designated the Commissioner as an agent for service of process.
7. The Division issued Jennison a license as a nonresident insurance producer on September 8, 2021, and assigned to Jennison National Producer Number 19611264.
8. On August 18, 2022, Jennison was appointed by Humana Insurance Company (“Humana”).
9. On February 6, 2023, Humana notified the Division of its decision to terminate Jennison’s appointment for cause due to Jennison selling health insurance plans without proper licensure to two Illinois consumers P.K. and A.O. (collectively “Consumers”).
10. On September 30, 2022, Jennison’s Illinois nonresident insurance producer license expired. Jennison did not renew his Illinois insurance license until September 14, 2023, nearly a year later.
11. On October 19, 2022, while his license was expired, Jennison sold a HumanaChoice PPO plan to Illinois consumer P.K.
12. Humana has processes in place to ensure that appointed producers have the required licenses for any given policy sale. Consequently, Humana discovered that Jennison’s Illinois nonresident producer license was expired when he sold the policy to P.K.

13. On October 25, 2022, Humana emailed Jennison to provide Jennison an opportunity to respond to the fact that he sold an insurance policy in Illinois while his Illinois license was expired. Jennison failed to adequately respond to Humana's request for information, and Humana finalized their finding that Jennison had sold a plan in Illinois without an active Illinois license.

14. On November 10, 2022, Humana emailed Jennison and provided the following warning: "Licensed Issue – Do not sell any additional Medicare products until you have obtained the required licenses. [P]lease call the Agent Services Division at 919-807-6800. You may apply for the additional license directly through the National Insurance Producer Registry (NIPR) at www.nipr.com."

15. Less than two months later, on January 3, 2023, Jennison sold a Humana Gold Plus HMO health plan to Illinois consumer A.O. At the time of this sale, Jennison still did not have an active Illinois insurance producer license.

16. On January 11, 2023, Humana terminated Jennison's contract and appointment for selling its plans while not licensed in violation of Humana corporate policies.

Division Communication Attempts

17. On February 6, 2023, the Division received notification from Humana of Jennison's termination for cause.

18. On February 8, 2023, a Division investigator emailed Jennison a Request for Information letter ("RFI") and Termination for Cause questionnaire ("TFC") to an email address provided by Jennison and noted in his licensing record, ryanjennison2@gmail.com. The RFI and TFC directed Jennison to respond to the investigator by February 18, 2023. The Division did not

receive any indication that the email failed to be delivered. To date, Jennison has not responded to that email.

19. On February 22, 2023, the investigator sent a second RFI and TFC to Jennison via FedEx to the residential address provided by Jennison and noted in his licensing record, 9608 NW 7th Cir. Apt. 1311, Plantation, FL 33324. The RFI and TFC directed Jennison to respond to the investigator by March 6, 2023. FedEx tracking confirms that the package containing the RFI and TFC was left at the doorway, with no signature obtained. To date, Jennison has not responded to the RFI and TFC.

20. On March 13, 2023, the investigator sent a third RFI and TFC to Jennison via FedEx to the address of Reeba Insurance Services, LLC, where Jennison was listed as a registered agent from a search of public records, at 540 SW 63rd Ave, Margate, FL, 33068. The RFI and TFC directed Jennison to respond by March 26, 2023. FedEx tracking confirms that the RFI and TFC was successfully delivered and signed for by "R.Jennison" on March 16, 2023. To date, Jennison has not responded to the RFI and TFC.

21. On February 26, 2024, Jennison contacted the Division. Jennison alleged that he had not received the Division's communication attempts because they were sent to his old address and a relative failed to timely give Jennison his mail. Jennison stated that he had moved to 540 SW 63rd, Margate, FL 33068 in January 2023. Following this communication, Jennison has been communicating with the Division.

III. CONCLUSIONS OF LAW

COUNT I

Using Fraudulent, Coercive, or Dishonest Practices or Demonstrating Incompetence, Untrustworthiness

22. Under Iowa Code § 522B.11(1)(h), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business.

23. Jennison used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility when he sold two insurance policies in Illinois when he knew or should have known that he was not actively licensed to sell insurance in Illinois.

24. Jennison further demonstrated incompetence, untrustworthiness, or financial irresponsibility when he made the second unlicensed sale in Illinois after Humana specifically prohibited him from doing so until he was properly licensed in Illinois.

25. Jennison's acts and practices violate Iowa Code § 522B.11(1)(h) subjecting Jennison to probation, suspension, or revocation of Jennison's insurance producer license, the imposition of a civil penalty, an order requiring Jennison to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT II

Failure to Update Address

26. Under Iowa Code § 522B.6(7) and Iowa administrative Code rule 191—10.12(2), a licensee shall inform the Commissioner of a change of address within thirty days of the change.

27. The address provided by Jennison and recorded in Jennison's producer licensing record for residence is 9608 NW 7th Cir., Apt. 1311, Plantation, FL 33324. On February 22, 2023, the Division sent an RFI to Jennison at this address.

28. Jennison moved from his address of record to 540 SW 63rd, Margate, FL 33068 in January of 2023. Jennison did not provide the Division's Producer Licensing Bureau with an updated residence address within 30 days and has not done so as of the date of this filing.

29. Jennison's failure to inform the Commissioner of a change in address violates Iowa Code § 522B.6(7) and Iowa Administrative Code rule 191—10.12(2), subjecting Jennison to a penalty, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.17, 507B.7, and 505.8.

IV. ORDER

WHEREFORE, IT IS ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code chapters 507B and 522B:

- A. Jennison's Iowa nonresident insurance producer license is suspended for one year from the date of this order, pursuant to Iowa Code §§507B.7, 522B.11, and 522B.17;
- B. Jennison pursuant to Iowa Code §§ 507B.7 and 522B shall immediately, and throughout his suspension period, cease and desist from engaging in the business of insurance in the state of Iowa;
- C. Jennison shall provide the Division's Producer Licensing Bureau with his current residential, mailing, and work addresses; personal telephone number; and email address within five days of this Order;

- D. Jennison shall, within 30 days of this Order, pay the amount of \$1,118.75, for the costs of investigation and prosecution pursuant to Iowa Code § 505.8. Payment shall be made payable to Iowa Insurance Division, to be credited to the Iowa Enforcement Fund to provide funds for insurance enforcement and education.
- E. This order may be enforced under Iowa Code chapters 507B and 522B, including but not limited to Iowa Code §§ 507B.8 and 522B.17(3), and additionally, by any collection remedies available to the State of Iowa Department of Revenue for unpaid penalties and other ordered monetary amounts.

SO ORDERED on the 28th day of March, 2024.



DOUGLAS M. OMMEN
Iowa Insurance Commissioner

Respectfully submitted,



Zebulon Black
Iowa Insurance Division
1963 Bell Avenue, Suite 100
Des Moines, Iowa 50315
Phone: (515) 654-6564
Email: zebulon.black@iid.iowa.gov

ATTORNEY FOR THE DIVISION

Copy to:

Ryan Chase Jennison
540 SW 63rd,
Margate, FL 33068
Email: ryanjennison2@gmail.com

RESPONDENT

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause, or their attorney, at their respective addresses disclosed on the pleadings on march 28, 2024.

By: First Class Mail Personal Service
 Restricted certified mail, return receipt Email, by consent
 Certified mail, return receipt _____

Signature: Brooke Hohn
Brooke Hohn

NOTICE OF PENALTIES FOR WILLFUL VIOLATION OF THIS ORDER

YOU ARE NOTIFIED that acting as an insurance producer, as defined in Iowa Code chapter 522B, in violation of this Order, is a felony under Iowa Code § 507A.10, subjecting you to punishment of imprisonment, jail, fines, or any combination of custody and fines.

YOU ARE ALSO NOTIFIED that if you violate this Order, you may be subject to administrative and civil penalties pursuant to Iowa Code § 522B.17(3). The Commissioner may petition the district court to hold a hearing to enforce the order as certified by the Commissioner. The district court may assess a civil penalty against you in an amount not less than three thousand dollars but not greater than ten thousand dollars for each violation and may issue further orders as it deems appropriate.

NOTICE REGARDING REINSTATEMENT

Upon entry of this Order, your insurance producer license will become inactive due to suspension. While your license is inactive, you are prohibited from conducting the business of insurance. Your license will not be active until the Division makes the determination to reinstate your insurance producer license by order pursuant to Iowa Administrative Code rule 191—10.10.

Reinstatement of your insurance producer license is subject to the discretion of the Commissioner. Additionally, it will not be granted unless and until you have complied with the terms of this Order, made the appropriate Application for Reinstatement with the Division, and paid all applicable fees. If applicable, you may also be required to apply for licensure through the National Insurance Producer Registry (NIPR) and pay all applicable fees. See Iowa Administrative Code rule 191—10.10.

NOTICE OF FINAL ORDER IMPACT

A final order of license suspension and/or a cease and desist order may adversely affect other existing business or professional licenses and may result in disciplinary action.

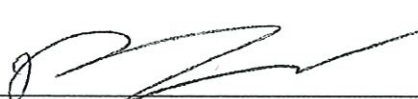
A final order in an administrative action does not resolve any potential criminal or civil violations or causes of action that might arise from the same or similar conduct that is the subject of this this order. It may result in criminal law enforcement authorities, including the fraud bureau of the Iowa Insurance Division, pursuing a criminal investigation or prosecution of potential criminal law violations.

CONSENT TO ORDER AND AGREEMENT

I, Ryan Chase Jennison, Respondent in this matter, have read, understood, and do knowingly consent to this Order in its entirety. I understand and acknowledge I have the right to consult with an attorney on this matter if I choose to do so, and I acknowledge that the Division cannot provide me an attorney, nor can the Division provide me legal advice. By executing this Consent, I understand that I am waiving my rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review.

I further understand this Order is considered a final administrative action that will be reported by the Division to the National Association of Insurance Commissioners and to other regulatory agencies. I also understand this Order is a public record under Iowa Code chapter 22 and information may be shared with other regulatory authorities or governmental agencies, pursuant to Iowa Code § 505.8(8)(d). I also understand this Order will be posted to the Division's website and a notation will be made to the publicly available website record that administrative action has been taken against me.

Dated: 03, 26, 2024




Ryan Chase Jennison, Respondent

540 SW 62nd Ave Mableton FL 33068
Address of Signatory

Subscribed and sworn before me by RYAN CHASE JENNISON this 26th day of MARCH, 2024.





Notary Public for the State of FLORIDA