

DEPARTMENT OF INSURANCE

STATE OF WYOMING

WYOMING INSURANCE DEPARTMENT,)
)
 Petitioner,)
)
 vs.) **Docket No. 11-04**
)
SHANNON HART,)
)
 Respondent.)

PETITION FOR NOTICE AND ORDER TO SHOW CAUSE

COMES NOW the Wyoming Department of Insurance, acting by and through Stephanie Bryant McGee, Deputy Commissioner, and pursuant to Wyo. Stat. §§ 26-1-103, 26-2-109 and 26-2-111, and Chapter 32 § 4 of the Wyoming Insurance Department Regulations and Rules for Practice and Procedure Before the Department; and the Wyoming Administrative Procedure Act, Wyo. Stat. § 16-3-101 *et seq.*, herewith moves the Wyoming Insurance Commissioner for the issuance of a Notice and Order to Show Cause directed to Shannon Hart, whose last reported address was 8347 Basswood Drive, Apartment 1-B, Indianapolis, Indiana 46268. As cause for this Petition, the Wyoming Insurance Department states and alleges as follows:

1. The Wyoming Insurance Commissioner has jurisdiction over this matter pursuant to Wyo. Stat. §§ 26-1-103, 26-2-109, 26-9-208(a)(i), and 26-9-211(a).
2. Respondent was provided notice of intent to file this action in compliance with Wyo. Stat. § 16-3-113(c) of the Administrative Procedures Act.
3. The notice required by Wyo. Stat. § 16-3-113(c) was mailed to Respondent by certified mail, return receipt requested on February 10, 2011.
4. Respondent is licensed by the Wyoming Department of Insurance as a nonresident producer, License No. 195099 issued January 11, 2010, with a renewal date of July 31, 2012. The Respondent's Individual ID is 10172103 and her National Producer ID is 15159227.
5. The business records of the Department of Insurance show Respondent is not affiliated with any insurer.
6. Petitioner received notification through the National Association of Insurance Commissioners' regulatory actions summary report notification service of a disciplinary action taken against Shannon Hart in her home state of Indiana.
7. Petitioner's investigation of the matter revealed that Respondent's Indiana producer license has been permanently revoked by the Indiana Commissioner of Insurance on January 6, 2011, for failure to disclose a previous felony conviction and failure to report administrative actions taken against her license in several other states.
8. Pursuant to Wyo. Stat. § 26-9-208(a)(i), a condition for nonresident licensing in Wyoming is that the person is currently licensed as a resident and is in good standing in their home state. Respondent's home state is Indiana.
9. Pursuant to Wyo. Stat. § 26-9-211(a), the Commissioner may place on probation, suspend, revoke or refuse to issue or renew an insurance producer's license for, among other reasons:

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DATE *Stephanie Bryant McGee*
BY *May 3, 2011*

(ii) Violating any insurance laws, or violating any regulation, subpoena or order of the commissioner or of another state's insurance commissioner;

(vi) Having been convicted of a felony;

(viii) Using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere;

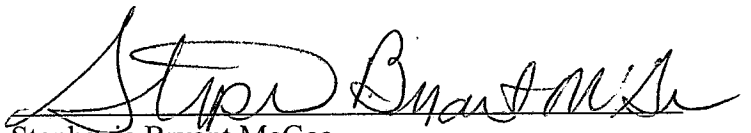
(ix) Having an insurance producer license, or its equivalent, denied, suspended or revoked in any other state, province, district or territory;

WHEREFORE the Department of Insurance respectfully prays that the Wyoming Insurance Commissioner:

A. Revoke the Respondent's nonresident producer license for violation of Wyo. Stat. § 26-9-211(a).

B. Enter such other and further relief as may be permitted by law.

Dated this 3rd day of May, 2011.



Stephanie Bryant McGee
Deputy Commissioner
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