

DEPARTMENT OF INSURANCE

STATE OF WYOMING

WYOMING INSURANCE DEPARTMENT,)
)
 Petitioner,)
)
 vs.) Docket No. 08-03
)
 Kelli M. Miller,)
)
 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 Kelli M. Miller, whose last reported address was 400 West Rand Road C108, Arlington Heights, Illinois, 60004. 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, 26-1-108, and 26-9-211.
2. Respondent is licensed by the Wyoming Department of Insurance as a nonresident producer, License No. 86854 issued September 22, 2005, with a renewal date of May 31, 2008. The Respondent's Individual ID is 74344 and her National Producer ID is 3697801.
3. The business records of the Department of Insurance show Respondent is not now affiliated with any insurer.
4. On or about March 12, 2008, Petitioner received notice from the National Association of Insurance Commissioners' Regulatory Information Retrieval System of an administrative action taken against Respondent's license in the state of Pennsylvania. Pursuant to Wyo. Stat. § 26-9-214 Petitioner further investigated the cause of action.
5. Petitioner's investigation revealed that Respondent's license has been revoked in several states, including her home state of Illinois. A copy of the Order of Revocation entered by the Director of Insurance in the State of Illinois Department of Financial and Professional

FILED
WYOMING INSURANCE DEPARTMENT
DATE March 19, 2008
BY Dee Anne Wilhelm

Regulation, Division of Insurance, on May 1, 2006, was requested and received in the Department on March 14, 2008. The Illinois Order found that Respondent Kelli M. Miller had demonstrated untrustworthiness, incompetence and financial irresponsibility by improperly withholding premiums required to be maintained in a fiduciary capacity. A copy of said order is on file herein.

6. Wyoming Statute, § 26-9-211(a) provides, in pertinent part, that the Commissioner may place on probation, suspend, revoke or refuse to issue or renew an insurance producer's license for violating any insurance laws, or violating any regulation, subpoena or order of the commissioner or of another state's insurance commissioner; improperly withholding, misappropriating or converting any monies or properties received in the course of doing insurance business; using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere; or having an insurance producer license, or its equivalent, denied, suspended or revoked in any other state, province, district or territory.

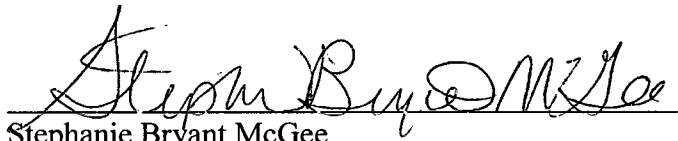
7. Wyoming Statute § 26-9-216 provides that a resident or nonresident insurance producer shall report to the commissioner any administrative action taken against the producer in another jurisdiction within 30 days of said action. More than 30 days have passed since the Order of Revocation was entered in the State of Illinois, and Respondent did not notify the Wyoming Department of Insurance of any such action.

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

A. Revoke the Respondent's nonresident producer license for violation of Wyo. Stat. §§ 26-9-211 and 26-9-216.

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

Dated this 19th day of March, 2008.


Stephanie Bryant McGee
Deputy Commissioner
Wyoming Department of Insurance
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