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STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

RADFORD, SHONDA RENE

(National Producer No. 16833139)

Respondent.

No. 23A-019-INS

CONSENT ORDER

The Arizona Department of Insurance and Financial Institutions (“Department”) has received evidence that **Shonda R. Radford** (“**Respondent**”) violated provisions of Arizona Revised Statutes (“A.R.S.”) Title 20. Respondent wishes to resolve this matter without the commencement of formal proceedings, and admits the following Findings of Fact are true, and consents to the entry of the following Conclusions of Law and Order.

FINDINGS OF FACT

1. Respondent was at all material times licensed as an Arizona non-resident insurance producer, National Producer Number 16833139, with a line of authority in accident and health or sickness insurance. The Department first licensed Respondent on June 2, 2022. Respondent’s Arizona non-resident license is scheduled to expire on December 31, 2023. Respondent currently holds a resident insurance producer license in Texas.

2. Respondent’s business address of record with the Department is 17710 Red Oak Drive, Apt. 260, Houston Texas 77090. Respondent’s mailing address of record with

1 the Department is 7100 West Grandview Road, Apt. 1107, Peoria, Arizona 85382-4909.
2 Respondent's email address of record with the Department is shobunnykisses@gmail.com.

3 3. On or about July 22, 2022, the Department received a letter from Cigna
4 Health and Life Insurance CO. ("Cigna") notifying the Department that Respondent's
5 appointments with Cigna have been "terminated, for cause" due to Respondent
6 "inappropriately enroll[ing] beneficiaries under the Change in Residence (MOV) SEP
7 [special enrollment period]."

8 4. The Department commenced an investigation into this matter. The
9 Department's investigation determined the following:

10 a) On or about May 11, 2022, Respondent enrolled an Arizona consumer R.H.
11 outside of the Standard Annual Enrollment Period (October 15 to December 7
12 of each year) without an existing qualifying event.

13 b) A review of the recorded telephonic call between Respondent and R.H.
14 revealed that when Respondent asked if R.H. "had any change of address ...
15 or major changes ... or anything that might qualify [him] for a special
16 enrollment period." R.H. responded, "I don't think so." Respondent then
17 stated "bear with me here. I am going to see if I can get a special enrollment
18 period." Respondent knowingly enrolled R.H. in a Medicare Plan during the
19 SEP without the existence of a special life event.

20 c) On or about January 19, 2023, the Department conducted a telephonic
21 interview with Respondent. During the interview, Respondent stated that she
22 did not recall the specifics of R.H.'s enrollment in Medicare but stated that if

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there was a doubt if an individual qualifies for a SEP, she would consult a supervisor, and if the supervisor was not available, she would then consult other Cigna’s employees through a group chat messaging.

CONCLUSIONS OF LAW

5. The Director has jurisdiction over this matter.

6. Respondent’s conduct, as described above, constitutes a violation of Title 20 or any rule, subpoena or order of the Director. A.R.S. § 20-295(A)(2).

7. Respondent’s conduct, as described above, constitutes using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere. A.R.S. § 20-295(A)(8).

8. Grounds exist, in addition to or instead of any suspension or revocation for the Director to impose a civil penalty of not more than \$250.00 for each unintentional failure or violation up to an aggregate civil penalty of \$2,500.00, or impose a civil penalty of not more than \$2,500.00 for each intentional failure or violation, up to an aggregate civil penalty of \$15,000.00. A.R.S. § 20-295(F).

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ORDER

IT IS HEREBY ORDERED THAT:

9. Shonda R. Radford’s Arizona insurance producer license, number 16833139,
is suspended for thirty (30) days following the effective date of this Order.

Effective this 22nd day of May, 2023.

Barbara D. Richardson

Barbara D. Richardson, Director
Arizona Department of Insurance and Financial Institutions

CONSENT TO ORDER

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1. Respondent acknowledges that it has been served with a copy of the foregoing Consent Order in the above-referenced matter, has read it, is aware of its right to an administrative hearing in this matter and has knowingly and voluntarily waived that right.

2. Respondent accepts the personal and subject matter jurisdiction of the Department over it in this matter.

3. Respondent acknowledges that no promise of any kind or nature has been made to induce it to sign the Consent to Order and it has done so knowingly and voluntarily.

4. Respondent acknowledges and agrees that the acceptance of this Consent to Order by the Director is solely to settle this matter and does not preclude the Department from instituting other proceedings as may be appropriate now or in the future. Furthermore, and notwithstanding any language in this Consent Order, this Consent Order does not preclude in any way any other state agency or officer or political subdivision of this state from instituting proceedings, investigating claims, or taking legal action as may be appropriate now or in the future relating to this matter or other matters concerning Respondent, including but not limited to violations of Arizona’s Consumer Fraud Act. Respondent acknowledges that, other than with respect to the Department, this Consent Order makes no representations, implied or otherwise, about the views or intended actions of any other state agency or officer or political subdivision of the state relating to this matter or other matters concerning Respondent.

5. Respondent acknowledges and agrees that failure to correct the violations set forth above in this Consent Order, or any repeat findings of the above violations in the

1 future, can result in disciplinary action which may include a greater civil money penalty and
2 suspension or revocation of its license.

3 6. Respondent waives all rights to seek an administrative or judicial review or
4 otherwise to challenge or contest the validity of this Consent Order and its accompanying
5 parts before any court of competent jurisdiction.

6 7. Respondent acknowledges that this Consent Order is an administrative action
7 that the Department will report to the National Association of Insurance Commissioners
8 (NAIC). Respondent further acknowledges that it must report this administrative action to
9 any and all states in which Respondent holds an insurance license and must disclose this
10 administrative action on any license application.

11
12 5/19/23

13 DATE

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13 **SHONDA R. RADFORD**
(NATIONAL PRODUCER NO. 16833139)

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1 **COPY** of the foregoing delivered via email
this 22nd day of May, 2023, to:

2 Shonda R. Radford
3 17710 Red Oak Drive, Apt. 260
Houston, TX 77090
4 Respondent

5 Shonda R. Radford
6 7100 West Grandview Road, Apt. 1107
Peoria, AZ 85382-4909
Respondent

7 **COPY** of the foregoing delivered/mailed same date, to:

8 Deian Ousounov, Assistant Director
9 Ana Starcevic, Paralegal Project Specialist
Cathy O'Neil, Consumer Regulatory Affairs Officer
10 Steven Fromholtz, Division Manager, Licensing
Linda Lutz, Legal Assistant, Licensing
11 Aqueelah Currie, Licensing Supervisor
Kyle Tapia, Investigator
12 Arizona Department of Insurance and Financial Institutions
100 North 15th Avenue, Suite 261
13 Phoenix, Arizona 85007-2630

14 Shonda R. Radford
shobunnykisses@gmail.com
15 Respondent

16 *Ana Starcevic*

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