

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED May 13, 2024 by AS

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of Unlicensed Activity of:

TARA LILLY SOUNAKHEN

(National Producer No. 15662938)

Respondent

No. 24A-041-INS

ORDER TO CEASE AND DESIST

The Arizona Department of Insurance and Financial Institutions (“Department”) received evidence that Tara Lilly Sounakhen (“Respondent”), has unlawfully engaged in transacting of insurance business in the state of Arizona. Accordingly, the Director of the Department (“Director”) makes the following Findings of Fact and Conclusions of Law and enters the following Order pursuant to A.R.S. § 20-292.

FINDINGS OF FACT

1. Respondent is a California resident holding an insurance producer license, national producer number 15662938.
2. On or about October 7, 2023, the Department received a complaint from America Memorial Life Insurance Company (“American Memorial”) “reporting [Respondent] for suspicious (and confirmed) fictitious policy submissions” affecting numerous, including Arizona, consumers.
3. Respondent is not, nor was she at any material time, licensed in Arizona as an insurance producer.

1 4. The Department commenced an investigation into this matter. The
2 Department's investigation found that Respondent submitted seven (7) Applications for Life
3 Insurance for two (2) Arizona consumers as follows:

- 4 • For consumer G.B. Respondent submitted four (4) Applications for Life
5 Insurance with effective dates June 10, 2023; July 18, 2023; August 1, 2023;
6 and September 2, 2023. At the time of the investigation, American
7 Memorial's records reflected the status of the June and September policies as
8 "canceled," the status of the July policy as "not taken," and the status of the
9 August policy as "active."
- 10 • For consumer B.R. Respondent submitted three (3) Applications for Life
11 Insurance with effective dates November 4, 2022; March 4, 2023; and July 22,
12 2023. At the time of the investigation, American Memorial's records
13 reflected the status of the November 2022 and the March 2023 policies as
14 "lapsed," and the status of the March policy as "lapsed."

15 5. On or about November 9, 2023, the Department contacted Respondent
16 informing her of the complaint and requesting a response to the allegations related to any
17 Arizona consumers.

18 6. On or about November 17, 2023, Respondent responded to the Department's
19 request stating, in part, "[a]ll policies that were written by me were done so by ensuring that
20 all medical questions were asked in there [sic] entirety, along with any and all
21 corresponding information, such as name, address, phone #, beneficiary and banking info,
22 as well as disclosures being read to each and every prospective client." Respondent did not

1 provide any explanations relating to her acting as an insurance producer in Arizona without
2 a license.

3 **CONCLUSIONS OF LAW**

- 4 1. The Director has jurisdiction over this matter.
- 5 2. Respondent's conduct, as described above, constitutes a violation of Title 20
6 or any rule, subpoena or order of the Director. A.R.S. § 20-295(A)(2).
- 7 3. Respondent's conduct, as described above, constitutes the sale, solicitation or
8 negotiation of insurance in Arizona without the authority to do so. A.R.S. § 20-282.
- 9 4. Respondent is not exempt from the licensure requirements. A.R.S. § 20-283.
- 10 5. The Department is authorized to order Respondent to cease and desist from
11 engaging in further violations of Arizona law. A.R.S. § 20-292.

12 **ORDER**

13 IT IS HEREBY ORDERED THAT:

14 Respondent Tara Lilly Sounakhen shall immediately cease and desist from selling,
15 soliciting or negotiating insurance in Arizona.

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NOTICE OF OPPORTUNITY FOR HEARING

Pursuant to Title 20 of the Arizona Revised Statutes, Respondent is hereby notified that it may request a hearing pursuant to A.R.S. § 20-161 to contest the order to cease and desist. Such a request must be in writing and received at the following address within thirty (30) days from the date hereof:

Arizona Department of Insurance and Financial Institutions
Attn: Alena Caravetta, Regulatory Legal Affairs Officer
100 North 15th Avenue, Suite 261
Phoenix, Arizona 85007-2630

Upon receipt of a timely written request for a hearing, the Department will issue an order setting the time and place of the hearing.

Effective this 13th day of May, 2024.

Barbara D. Richardson
Barbara D. Richardson
Cabinet Executive Officer
Executive Deputy Director
Arizona Department of Insurance and Financial Institutions

1 **ORIGINAL** of the foregoing filed
this 14 day of May, 2024, in the office of:

2 Barbara D. Richardson, Cabinet Executive Officer & Executive Deputy Director
3 Arizona Department of Insurance and Financial Institutions
4 Attn: Ana Starcevic, Project Specialist
5 100 North 15th Avenue, Suite 261
6 Phoenix, AZ 85007-2630

7 **COPY** of the foregoing mailed by First Class and Certified Mail,
8 Delivery Receipt requested, the same date to:

9 Tara Lilly Sounakhen
5900 Center Dr., Apt. 325
Los Angeles, CA 90045-8915
Respondent 9489 0090 0027 6556 3624 07

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

11 Deian Ousounov, Assistant Director
12 Alena Caravetta, Regulatory Legal Affairs Officer
13 Ana Starcevic, Unit Project Specialist
14 Catherine O'Neil, Consumer Legal Affairs Officer
15 Steven Fromholtz, Licensing Manager
16 Aqueelah Currie, Licensing Supervisor
17 Linda Lutz, Legal Assistant
18 Jesus Acosta, Investigator
19 Arizona Department of Insurance and Financial Institutions
20 100 North 15th Avenue, Suite 261
21 Phoenix, Arizona 85007-2630

22 Tara Lilly Sounakhen
tarasounkhen@gmail.com
Respondent

Ana Starcevic _____