STATE OF ARIZONA

Department of Insurance and Financial Institutions FILED september 10th , 2024 by MK

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

On July 31, 2024, the Arizona Department of Insurance and Financial Institutions (the

In the Matter of:

No. 24A-051-INS

JEREMY REUVERS

DEFAULT ORDER

(National Producer No. 17829996)

Respondent

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"Department") issued a Notice of Hearing and Complaint ("Notice") in the above-captioned matter, a copy of which is attached as **Exhibit A** and incorporated by this reference. The Notice required Jeremy Reuvers ("Respondent") to provide a written answer to the allegations set forth in the Notice within twenty days of the issuance of the Notice. As of this date, Respondent has failed to file an answer. On August 26, 2024, counsel for the Department filed a Motion for Default, a copy of which is attached as **Exhibit B**. As of this date, Respondent has not responded to the Department's motion. Pursuant to A.A.C. R20-6-106(D), a party that fails to file an answer within the time provided shall be deemed to be in default and one or more of the allegations in the Notice of Hearing may be deemed to be admitted.

FINDINGS OF FACT

- 1. Notice was proper.
- 2. Respondent is in default.
- 3. The allegations in the Notice are deemed admitted.

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CONCLUSIONS OF LAW 1 The conduct alleged in the Notice constitutes grounds for the Director to 1. 2 3 suspend, revoke or refuse to renew Respondent's license to transact insurance in Arizona, 4 pursuant to A.R.S. §20-295(A). 5 **ORDER** 6 IT IS ORDERED: 7 1. Jeremy Reuvers' Arizona resident insurance producer license, National 8 Producer No. 17829996, effective upon the issuance of this Order. 9 10 2. The hearing set for **September 18, 2024** at **9:30 a.m.** shall be vacated. 11 DATED and EFFECTIVE this 10th day of September, 2024. 12 Barbara D. Richardson 13 Barbara D. Richardson, Director 14 Arizona Department of Insurance and Financial Institutions 15 16 17 18 19 20 21 22 23 24 25

| 1 | COPY of the foregoing electronically filed this 11th day of September, 2024 to: |
|----|---|
| 3 | Tammy Eigenheer, Administrative Law Judge https://portal.azoah.com/submission O S S S S S S S S S S S S S S S S S S |
| 4 | Office of Administrative Hearings |
| 5 | COPY of the foregoing emailed same date to: |
| 6 | Deian Ousounov, Chief Financial Deputy Director |
| 7 | Alena Caravetta, Regulatory Legal Affairs Officer Ana Starcevic, Project Specialist |
| 8 | Mayra Kariem, Insurance Analyst |
| 9 | Rachel Smith, Insurance Analyst/Investigator Steven Fromholtz, Licensing Manager |
| 10 | Aqueelah Currie, Licensing Supervisor Arizona Department of Insurance and Financial Institutions |
| 11 | |
| 12 | Zachary Howard, Assistant Attorney General AdminLaw@azag.gov |
| 13 | Attorney for the Arizona Department of Insurance and Financial Institutions |
| 14 | Jeremy Reuvers |
| 15 | licensingusaa@usaa.com Respondent |
| 16 | |
| 17 | COPY mailed same date by U.S. First Class and Certified Mail, Return Receipt requested, to: |
| | Jeremy Reuvers |
| 18 | 16201 W. Superior Ave. |
| 19 | Goodyear, AZ 85338 **Respondent** 9489 0090 0027 6599 3142 58 |
| 20 | |
| 21 | Mayra Kariem |
| 22 | 121329 |
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Exhibit A

1 STATE OF ARIZONA DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS 2 3 In the Matter of: No. 24A-051-INS 4 JEREMY REUVERS 5 NOTICE OF HEARING AND (National Producer Number 17829996) **COMPLAINT** 6 Respondent (ALJ Tammy Eigenheer) 7 8 DIRECTED TO: 9 Jeremy Reuvers 10 16201 W. Superior Ave. Goodyear, AZ 85338 11 Respondent 12 YOU ARE HEREBY NOTIFIED that under Arizona Revised Statutes ("A.R.S.") 13 §§ 20-161 and 41-1092.01, the above-captioned matter will be conducted through the Office 14 of Administrative Hearings, an independent agency. 15 Date of Hearing: 16 September 18, 2024 at 9:30 a.m. 17 Location: Office of Administrative Hearings 18 1740 W. Adams St. 19 Lower Level Phoenix, AZ 85007 20 Information regarding procedures, practice pointers, or the online filing of motions is 21 available through the Office of Administrative Hearings' website at www.azoah.com, or by 22 calling their offices at (602) 542-9826. 23 The Office of Administrative Hearings has designated Tammy Eigenheer, at the 24 address and phone number listed above, as the Administrative Law Judge for these 25 proceedings. 26

Under the Americans with Disabilities Act ("ADA"), the Office of Administrative Hearings endeavors to ensure the accessibility of its hearings to all persons with disabilities. Persons with disabilities may request reasonable accommodations such as interpreters, alternative formats, or assistance with physical accessibility. Requests for accommodations should be made as far in advance of the Hearing as possible to allow time to arrange the accommodations. If you require accommodations, please contact the Office of Administrative Hearings by calling their offices at (602) 542-9826.

Under Arizona Administrative Code (A.A.C.) R2-19-106 and R2-19-110, motions to continue this matter shall be made in writing to the Administrative Law Judge at least fifteen (15) days before the Hearing date, unless good cause is demonstrated. A copy of any motion to continue shall be filed and served according to A.A.C. R2-19-108, with a copy provided to the Assistant Attorney General identified below.

You may appear on the date and at the time and place specified in this Notice with or without the assistance of counsel. An insurance company may be represented by a corporate officer pursuant to A.R.S § 20-161(B). Additionally, you have the right to present evidence in response to the allegations in this Notice, to have a reasonable opportunity to inspect all documentary evidence, to examine witnesses, to present evidence in support of your interests, and to have subpoenas issued by the Administrative Law Judge to compel the attendance of witnesses and the production of evidence. If you fail to appear at the administrative hearing (the "Hearing"), the Administrative Law Judge can proceed with the Hearing and issue a Recommended Decision. The Director of the Arizona Department of Insurance and Financial Institutions (the "Director") can then consider the Recommended Decision and make a final determination on this matter.

Under A.R.S. § 41-1092.07(E), a clear and accurate record of the proceedings will be made by a court reporter or by electronic means. Any party that requests a transcript of the proceedings shall pay the cost of the transcript for the court reporter or other transcriber.

Department will be present.

Under A.A.C. R20-6-106, within twenty (20) days after service of a Notice of Hearing, the Respondent shall appear by filing a written Answer to the allegations in the Notice. The Answer shall state Respondent's position or defense and shall specifically admit or deny each assertion in the Notice. Any allegation not denied shall be deemed admitted. Any defense not raised will be considered waived. If a timely Answer is not filed, Respondent may be deemed in default and the Director may deem the allegations in the Notice as true and admitted. Accordingly, the Director may take whatever action is deemed appropriate.

Pursuant to A.R.S. § 41-1092.06, Respondent has the right to request an informal settlement conference ("ISC") by filing a written request with the Arizona Department of Insurance and Financial Institutions ("Department") no later than twenty (20) days before the scheduled hearing. The ISC will be held within fifteen (15) days after receiving the

Please note that in requesting an ISC, Respondent waives any right to object to the participation of the Department's representative in the final administrative decision of this matter. Any statements, either written or oral, made by the Department, Respondent, or their representatives at an ISC, including a written document created or expressed solely for the purpose of settlement negotiations, are inadmissible in any subsequent administrative hearing. See A.R.S. § 41-1092.06.

If an ISC is requested, a person with the authority to act on behalf of the

Questions concerning issues raised in this Notice should be directed to Assistant Attorney General Zachary Howard, 2005 North Central Avenue, Phoenix, AZ 85004, telephone number (602) 542-7769, or by e-mail at <u>Zachary.Howard@azag.gov</u>.

The purpose of the Hearing is to determine whether grounds exist to revoke Respondent's Arizona insurance producer license. In support of its position that grounds exist, the Department alleges the following:

PARTIES & JURISDICTION

- 1. The Department was created and enabled to administer certain laws of the State of Arizona including the licensure and regulation of the insurance producer profession in this state. A.R.S. § 20-142 and A.R.S. §§ 20-281 et seq.
 - 2. Jeremy Reuvers ("Reuvers" or "Respondent") holds a license as an Arizona insurance producer.
- 3. The Office of Administrative Hearings has subject matter and personal jurisdiction over the named parties in this Notice under A.R.S. § 20-161 and A.R.S. §§ 41-1092 et seq.

FACTS

- 4. On January 20, 2016, the Department issued Reuvers an Arizona resident insurance producer license, National Producer Number 17829996, with a line of authority in Personal Lines insurance. Reuvers last renewed his license on September 1, 2023, and it is scheduled to expire on August 31, 2027.
- 5. Reuvers' addresses of record with the Department are: One Norterra Drive, Phoenix, Arizona 85085 (business), 16201 W. Superior Ave., Goodyear, Arizona 85338 (mailing) and licensingusaa@usaa.com (e-mail).
- 6. On February 20, 2024, the United States Automobile Association ("USAA") sent the Department notice that it had terminated Reuvers for cause and cancelled his company appointments upon learning that he had been convicted of felony charges in January 2024.
- 7. The Department reviewed Reuvers' last Arizona license renewal application ("Application") that was submitted by USAA staff as the "Authorized Submitter" on July 25, 2023, via the National Insurance Producer Registry (NIPR). The Authorized Submitter stated in the Application, "As the authorized submitter, I declare that the applicant provided all the information submitted on this application."

- 8. On the Application, Reuvers answered "No" to question 1B, which asks: "[h]ave you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony, which has not been previously reported to this insurance department? You may exclude juvenile adjudications (offenses where you were adjudicated in juvenile court)."
- 9. On July 10, 2023, Reuvers was indicted on COUNT 1: SEXUAL ABUSE, A CLASS THREE FELONY Dangerous Crime Against Children, and COUNT 2: ATTEMPT TO COMMIT SEXUAL ABUSE, A CLASS 4 FELONY Dangerous Crime Against Children, in Maricopa County Superior Court.
 - 10. On January 23, 2024, a jury found Reuvers guilty of both felony counts.
- 11. On March 11, 2024, the Department issued a Subpoena to Reuvers, via certified mail, to his address of record. The subpoena was returned to the Department as "Return to Sender, Not Deliverable as Addressed, Unable to Forward."
- 12. On March 29, 2024, Reuvers was sentenced to 90 days in jail and 10 years of supervised probation upon release.
- 13. On June 2, 2024, the Insurance Commissioner for the State of Arkansas ordered the revocation of Reuvers' Arkansas non-resident insurance producer license. The Facts section of the Revocation Order included the following:
 - a. Fact 3: "During the Department's investigation into this matter it was determined that the termination of the appointment was the result of a finding by USAA that the Respondent was arrested, charged, and convicted in the State of Arizona on February 14, 2024, of sexual assault, a felony under the Arizona State Criminal Code."
 - b. Fact 4: "Furthermore, Respondent failed to disclose that he was the subject of criminal charges, and that his licenses were renewed without notice of said charges in Iowa, California, and New Mexico."

1 14. On July 25, 2024, the Department received notification that the Connecticut 2 Department of Insurance revoked Reuvers' non-resident insurance producer license. 3 **CONCLUSIONS OF LAW** 4 15. The Director has jurisdiction over this matter. 5 16. Respondent's conduct, as described above, constitutes providing incorrect, misleading, incomplete or materially untrue information in the license application, within the 6 meaning of A.R.S. § 20-295(A)(1). 7 8 Respondent's conduct, as described above, constitutes violating any provision 17. of this title or any rule, subpoena or order of the director, within the meaning of A.R.S. § 20-10 295(A)(2). 11 Respondent's conduct, as described above, constitutes having been convicted 18. of a felony, within the meaning of A.R.S. § 20-295(A)(6). 12 13 19. Grounds exist for the Director to suspend, revoke or refuse to renew Respondent's insurance producer license pursuant to A.R.S. § 20-295(A)(1), (A)(2) and 14 15 (A)(6).THEREFORE, on the basis of the foregoing, the Department requests: 16 17 1. That the insurance producer license held by Respondent Jeremy Reuvers be 18 revoked under those statutes cited, and any other applicable statutes or rules; and 19 2. Any further relief that the tribunal deems appropriate. 20 DATED this ^{31st}day of July, 2024. 21 Alens Caranetta 22 Alena Caravetta, Regulatory Legal Affairs Officer Arizona Department of Insurance and 23 Financial Institutions 24 25

E-FILE of the foregoing delivered electronically this ³¹ day of July, 2024, to: 2 Tammy Eigenheer, Administrative Law Judge 3 https://portal.azoah.com/submission Office of Administrative Hearings 4 5 COPY of the foregoing mailed by Regular Mail and U.S. Certified Mail. 6 Electronic Receipt Requested, same date to: 7 Jeremy Reuvers 8 16201 W. Superior Ave. Goodyear, AZ 85338 Respondent 9489 0090 0027 6599 3144 01 10 COPY of the foregoing electronically delivered same date to: 11 Alena Caravetta, Regulatory Legal Affairs Officer 12 Ana Starcevic, Project Specialist Rachel Smith, Insurance Analyst/Investigator 13 Arizona Department of Insurance and Financial Institutions 14 100 North 15th Avenue, Suite 261 Phoenix, Arizona 85007 15 Jeremy Reuvers 16 licensingusaa@usaa.com 17 Respondent 18 Zachary Howard, Assistant Attorney General Zachary. Howard@azag.gov 19 Adminlaw@azag.gov Attorney for the Arizona Department 20 of Insurance and Financial Institutions 21 22 Mayra Kariem Investigator Admin Assistant 23 24 25

Exhibit B

STATE OF ARIZONA

Department of Insurance and Financial Institutions **FILED** August 26, 2024 by MK

1 KRISTIN K. MAYES Attorney General 2 Firm Bar No. 14000 3 Zachary Howard State Bar No. 035168 4 Assistant Attorney General Public Law Section 2005 N. Central Ave. 5 Phoenix, Arizona 85004 Telephone: (602) 542-7769 6 E-mail: Zachary. Howard@azag.gov Attorney for the Arizona Department of Insurance 7 and Financial Institutions 8 STATE OF ARIZONA 9 DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS 10 In the Matter of: 11 No. 24A-051-INS JEREMY REUVERS 12 MOTION FOR DEFAULT (National Producer No. 17829996) 13 Respondent 14 15 The Arizona Department of Insurance and Financial Institutions ("Department"), by 16 and through undersigned counsel, hereby requests that the Findings of Fact and Conclusions 17 of Law set forth in the Notice of Hearing and incorporated herein by reference be entered in 18 this matter, deeming Jeremy Reuvers ("Respondent") in default, deeming the allegations set 19 forth in the Notice as true, and ordering that Respondent's insurance license be revoked. 20 21 On July 31, 2024, a Notice of Hearing and Complaint ("Notice") was filed in this 22 matter and served upon Respondents at his mailing address of record via regular mail and 23 certified mail pursuant to A.R.S. § 41-1092.04. The Notice was also sent to Respondent via 24 his e-mail address of record. 25

Respondent had twenty (20) days from the date of issuance of the Notice to file a written answer to the allegations contained therein pursuant to Arizona Administrative Code ("A.A.C") R20-6-106. As of the date of this Motion, Respondent has not filed an answer nor has he appeared through counsel. Rule 20-6-106(D) of the Arizona Administrative Code provides that if an answer is not timely filed, the Respondent shall be deemed in default and the Director may deem the allegations set forth in the Notice of Hearing as true and take whatever action is appropriate including revoking the license.

The allegations supporting the Notice of Hearing are as follows:

- 1. On January 20, 2016, the Department issued Reuvers an Arizona resident insurance producer license, National Producer Number 17829996, with a line of authority in Personal Lines insurance. Reuvers last renewed his license on September 1, 2023, and it is scheduled to expire on August 31, 2027.
- 2. Reuvers' addresses of record with the Department are: One Norterra Drive, Phoenix, Arizona 85085 (business), 16201 W. Superior Ave., Goodyear, Arizona 85338 (mailing) and licensingusaa@usaa.com (e-mail).
- 3. On February 20, 2024, the United States Automobile Association ("USAA") sent the Department notice that it had terminated Reuvers for cause and cancelled his company appointments upon learning that he had been convicted of felony charges in January 2024.
- 4. The Department reviewed Reuvers' last Arizona license renewal application ("Application") that was submitted by USAA staff as the "Authorized Submitter" on July 25, 2023, via the National Insurance Producer Registry (NIPR). The Authorized Submitter stated

in the Application, "As the authorized submitter, I declare that the applicant provided all the information submitted on this application."

- 5. On the Application, Reuvers answered "No" to question 1B, which asks: "Have you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony, which has not been previously reported to this insurance department? You may exclude juvenile adjudications (offenses where you were adjudicated in juvenile court)."
- 6. On July 10, 2023, Reuvers was indicted on COUNT 1: SEXUAL ABUSE, A CLASS THREE FELONY Dangerous Crime Against Children, and COUNT 2: ATTEMPT TO COMMIT SEXUAL ABUSE, A CLASS 4 FELONY Dangerous Crime Against Children, in Maricopa County Superior Court.
 - 7. On January 23, 2024, a jury found Reuvers guilty of both felony counts.
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- 10. On June 2, 2024, the Insurance Commissioner for the State of Arkansas ordered the revocation of Reuvers' Arkansas non-resident insurance producer license. The Facts section of the Revocation Order included the following:
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finding by USAA that the Respondent was arrested, charged, and convicted in the State of Arizona on February 14, 2024, of sexual assault, a felony under the Arizona State Criminal Code."

b. Fact 4: "Furthermore, Respondent failed to disclose that he was the subject of criminal charges, and that his licenses were renewed without notice of said charges in Iowa, California, and New Mexico."

CONCLUSIONS OF LAW

- 11. The Director has jurisdiction over this matter.
- 12. Respondent's conduct, as described above, constitutes providing incorrect, misleading, incomplete or materially untrue information in the license application, within the meaning of A.R.S. § 20-295(A)(1).
- 13. Respondent's conduct, as described above, constitutes violating any provision of this title or any rule, subpoena or order of the director, within the meaning of A.R.S. § 20-295(A)(2).
- 14. Respondent's conduct, as described above, constitutes having been convicted of a felony, within the meaning of A.R.S. § 20-295(A)(6).
- 15. Grounds exist for the Director to suspend, revoke or refuse to renew Respondent's insurance producer license pursuant to A.R.S. § 20-295(A)(1), (A)(2) and (A)(6).

Based upon the foregoing, the Department respectfully requests that the allegations set forth in the July 31, 2024 Notice of Hearing and Complaint be deemed admitted and that Respondent's insurance license be revoked.

RESPECTFULLY SUBMITTED this 26th day of August, 2024. 2 KRISTIN K. MAYES, Attorney General 3 4 By /s/ Zachary Howard Zachary Howard, Assistant Attorney General 5 Attorney for the Arizona Department of Insurance and Financial Institutions 6 7 **COPY** of the foregoing electronically filed this 8 26th day of August, 2024 with: 9 Barbara D. Richardson, Cabinet Executive Officer 10 c/o of Deian Ousounov, Chief Financial Deputy Director Arizona Department of Insurance and Financial Institutions 11 **COPY** of the foregoing emailed this same date to: 12 13 Alena Caravetta, Regulatory Legal Affairs Officer Ana Starcevic, Project Specialist 14 Mayra Keim, Insurance Analyst Rachel Smith, Insurance Analyst/Investigator 15 Arizona Department of Insurance and Financial Institutions 16 **COPY** of the foregoing mailed this same date to: 17 Jeremy Reuvers 18 16201 W. Superior Ave. Goodyear, AZ 85338 19 Respondent 20 21 /s/ S. Hack 22 12132140 23 24 25 26