

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED March 26, 2025 by AS

STATE OF ARIZONA
DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

JAVON DAWSON
(National Producer No. 18810879)

Respondent

No. 24A-092-INS

DEFAULT ORDER

On February 14, 2025, the Arizona Department of Insurance and Financial Institutions (the “Department”) issued an Amended 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 Javon Dawson (“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 March 11, 2025, 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.

1 **CONCLUSIONS OF LAW**

2 1. The conduct alleged in the Notice constitutes grounds for the Director to
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. Javon Dawson's Arizona non-resident insurance producer license, National
8 Producer Number 18810879, is revoked effective upon the issuance of this Order.

9 2. The hearing set for **April 14, 2025** at **1:00 p.m.** shall be vacated.

10 DATED and EFFECTIVE this 26th day of March, 2025.

11 *Barbara D. Richardson*

12 Barbara D. Richardson, Director
13 Arizona Department of Insurance and Financial Institutions
14
15
16
17
18
19
20
21
22

COPY of the foregoing electronically filed this
26th day of March, 2025 to:

Jenna Clark, Administrative Law Judge
<https://portal.azoah.com/submission>
Office of Administrative Hearings

COPY of the foregoing emailed same date to:

Alena Caravetta, Regulatory Legal Affairs Officer
Ana Starcevic, Project Specialist
Steven Fromholtz, Licensing Manager
Aqueelah Currie, Licensing Supervisor
Linda Lutz, Legal Assistant
Rachel Smith, Insurance Analyst/Investigator
Arizona Department of Insurance and Financial Institutions

Javon Dawson
Javondawson58@gmail.com
Respondent

Zachary Howard, Assistant Attorney General
AdminLaw@azag.gov
Attorney for the Arizona Department of Insurance and Financial Institutions

COPY mailed same date by U.S. First Class and Certified Mail,
Return Receipt Requested, to:

Javon Dawson
25144 Inkster Road
Southfield, MI 48033
Respondent

9489 0090 0027 6655 0795 89

Ana Starcevic

Exhibit A

STATE OF ARIZONA
DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

No. 24A-092-INS

JAVON DAWSON
(National Producer Number 18810879)

**AMENDED NOTICE OF HEARING
AND COMPLAINT**

Respondent

(ALJ Jenna Clark)

DIRECTED TO:

Javon Dawson
25144 Inkster Rd.
Southfield, MI 48033
Respondent

YOU ARE HERBY NOTIFIED that under Arizona Revised Statutes ("A.R.S.") §§ 20-161 and 41-1092.01, the above-captioned matter will be conducted through the Office of Administrative Hearings, an independent agency.

Date of Hearing:
April 14, 2025 at 1:00 p.m.

Location:
Office of Administrative Hearings
Meeting ID: meet.google.com/zdd-mekr-zqh

-OR-

Phone Number: (574) 313-1112
PIN: 652 677 846#

Information regarding procedures, practice pointers, or the online filing of motions is available through the Office of Administrative Hearings' website at www.azoah.com, or by calling their offices at (602) 542-9826.

The Office of Administrative Hearings has designated Jenna Clark, at the address and phone number listed above, as the Administrative Law Judge for these proceedings.

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

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

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

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

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

9 Pursuant to A.R.S. § 41-1092.06, Respondent has the right to request an informal
10 settlement conference ("ISC") by filing a written request with the Arizona Department of
11 Insurance and Financial Institutions ("Department") no later than **twenty (20) days** before
12 the scheduled hearing. The ISC will be held within **fifteen (15) days** after receiving the
13 request. If an ISC is requested, a person with the authority to act on behalf of the
14 Department will be present.

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

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

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

Other States' Actions

8. During the Department's investigation it was discovered that Dawson had been the subject of several actions in other state jurisdictions. These actions included the following:

- a. Dawson's insurance producer license was revoked in South Carolina in July 2024 after the South Carolina Department of Insurance found that Dawson had enrolled at least three (3) consumers in Aetna policies without their consent and failed to respond to their investigation.
- b. Dawson's insurance producer license was revoked in Kentucky in April 2024 after the Kentucky Department of Insurance found that Dawson enrolled ten (10) Kentucky consumers into policy applications without their consent by forging signatures. Dawson also failed to report other state actions.
- c. Dawson's insurance producer license was revoked in Nebraska in February 2024 after the Nebraska Department of Insurance found that Dawson failed to report other state actions and provided an insubstantial response to their investigation.
- d. Dawson's insurance producer license was suspended in Louisiana effective February 2024 after the Louisiana Department of Insurance found that Dawson failed to report other state actions and failed to respond to their investigation.
- e. Dawson's insurance producer license was revoked in Utah effective January 2024 after the Utah Department of Insurance found that Dawson failed to report other state actions and failed to respond to their investigation.

f. The investigator further found that Dawson's Connecticut license was revoked in December 2023, his North Carolina license was voluntarily surrendered in September 2023, and his Indiana license was suspended in May 2023.

9. The only prior state action that Dawson disclosed to the Arizona Department of Insurance and Financial Institutions was the suspension of the Indiana license.

Dawson Response to Investigation

10. On April 18, 2024, the Department's Investigator sent a communication to Dawson requesting that he provide a narrative response with respect to Humana's allegations and the Department's findings of disciplinary action taken against his license in other states. The Department required that he respond by April 24, 2024.

11. On April 23, 2024, Dawson provided a response wherein he denied that he was responsible for any unauthorized policies and that his Humana appointment and login information was hacked. He also asserted that he had filed a claim with Error & Omissions insurer, Continental Casualty Company ("CNA") to provide representation in appealing the other state actions.

12. Following Dawson's response, the Department's Investigator reached out to CNA to inquire whether Dawson's hacking claim had any validity and to see if they would provide legal representation. On July 17, 2024, CNA provided a final claim determination showing Dawson's claim had been denied because cyber security was not included in the coverage. CNA did not assess the validity of Dawson's assertion that he was not responsible for the alleged fraudulent policies.

13. The Department's investigator followed up with Dawson in August 2024, asking for him to provide documentation to substantiate his hacking claims made in the narrative response. No documentation was provided and on August 13, 2024, Dawson responded by requesting to surrender his license.

CONCLUSIONS OF LAW

14. The Director has jurisdiction over this matter.

15. Respondent failed to report any administrative action taken against him in another jurisdiction or by another governmental agency within thirty days of the final disposition of the matter as required by A.R.S. § 20-301(A).

16. 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).

17. Respondent has been found to have committed insurance fraud in other jurisdictions as contemplated in A.R.S. § 20-295(A)(7).

18. 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, within the meaning of A.R.S. § 20-295(A)(8).

19. Respondents' conduct, as described above, constitutes having an insurance producer license, or its equivalent, denied, suspended, or revoked in any state, province, district, or territory pursuant to A.R.S. § 20-295(A)(9).

20. Grounds exists for the Director to suspend, revoke or refuse to renew Respondent's insurance producer license pursuant to A.R.S. §§ 20-295(A)(2), (A)(7), (A)(8), (A)(9), and 20-301(A).

THEREFORE, on the basis of the foregoing, the Department requests:

1. That Javon Dawson's Arizona non-resident insurance producer license, number 18810879, be revoked.

2. Any further relief that the tribunal deems appropriate.

//

//

1 DATED this 13th day of February, 2025.

2 *Alena Caravetta*

3 Alena Caravetta, Regulatory Legal Affairs Officer
4 Arizona Department of Insurance and
5 Financial Institutions

6 **E-FILE** of the foregoing delivered electronically
7 this 14th day of February, 2025, to:

8 Jenna Clark, Administrative Law Judge
9 <https://portal.azoah.com/submission>
10 Office of Administrative Hearings

11 **COPY** of the foregoing mailed by Regular Mail and
12 U.S. Certified Mail, Electronic Receipt Requested
13 same date to:

13 Javon Dawson
14 25144 Inkster Rd.
15 Southfield, MI 48033

15 *Respondent* 9489 0090 0027 6606 0712 59

16 **COPY** of the foregoing electronically delivered same date to:

17 Alena Caravetta, Regulatory Legal Affairs Officer
18 Ana Starcevic, Unit Project Specialist
19 Mayra Kariem, Insurance Analyst
20 Rachel Smith, Insurance Analyst/Investigator
21 Arizona Department of Insurance and Financial Institutions
22 100 North 15th Avenue, Suite 261
23 Phoenix, Arizona 85007

21 Javon Dawson
22 Javondawson58@gmail.com
23 *Respondent*

24 Zachary Howard, Assistant Attorneys General
25 Zachary.Howard@azag.gov
26 *Attorney for the Arizona Department*
of Insurance and Financial Institutions

Mayra Kariem

Exhibit B

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED March 11, 2025 by AS

KRISTIN K. MAYES
Attorney General
Firm Bar No. 14000

Zachary Howard
State Bar No. 035168
Assistant Attorney General
Public Law Section
2005 N. Central Ave.
Phoenix, Arizona 85004
Telephone: (602) 542-7769
E-mail: Zachary.Howard@azag.gov
Attorney for the Arizona Department of Insurance
and Financial Institutions

STATE OF ARIZONA
DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

JAVON DAWSON
(National Producer No. 18810879)

Respondent

No. 24A-092-INS

MOTION FOR DEFAULT

The Arizona Department of Insurance and Financial Institutions ("Department"), by and through undersigned counsel, hereby requests that the Findings of Fact and Conclusions of Law set forth in the Amended Notice of Hearing and Complaint and incorporated herein by reference be entered in this matter, deeming Javon Dawson ("Respondent") in default, deeming the allegations set forth in the Notice as true, and ordering that Respondent's insurance license be revoked.

On February 14, 2025, an Amended Notice of Hearing and Complaint ("Notice") was filed in this matter and served upon Respondent at his mailing address of record via regular mail and certified mail pursuant to A.R.S. § 41-1092.04. The Notice was also sent to

Respondent via his e-mail address of record.

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 Amended Notice of Hearing and Complaint are as follows:

1. The Department first issued an Arizona non-resident insurance producer license, National Producer Number 18810879, with a line of authority in accident and health or sickness insurance to Dawson on March 4, 2023. The license is scheduled to expire on October 31, 2026.

2. Dawson’s address of record with the Department is 25144 Inkster Rd., Southfield, Michigan 48033 (business, mailing, and residence). His e-mail of record is javondawson58@gmail.com.

Humana Insurance Termination Notice Referral

3. On February 12, 2024, the Department received a Termination for Cause Notice from Humana Insurance Company (“Humana”) alleging that Dawson had engaged in fraudulent or dishonest acts in the state of Arizona. The referral did not specify the nature of the acts.

1 4. Upon further inquiry, the Department's investigator discovered the cause for
2 the termination was due to allegations that Dawson enrolled clients as members of Humana's
3 plans without meeting face to face and without their consent.

4 **Other States' Actions**

5 5. During the Department's investigation it was discovered that Dawson had been
6 the subject of several actions in other state jurisdictions. These actions included the
7 following:
8

9 a. Dawson's insurance producer license was revoked in South Carolina in
10 July 2024 after the South Carolina Department of Insurance found that Dawson had enrolled
11 at least three (3) consumers in Aetna policies without their consent and failed to respond to
12 their investigation.
13

14 b. Dawson's insurance producer license was revoked in Kentucky in April
15 2024 after the Kentucky Department of Insurance found that Dawson enrolled ten (10)
16 Kentucky consumers into policy applications without their consent by forging signatures.
17 Dawson also failed to report other state actions.

18 c. Dawson's insurance producer license was revoked in Nebraska in
19 February 2024 after the Nebraska Department of Insurance found that Dawson failed to
20 report other state actions and provided an insubstantial response to their investigation.
21

22 d. Dawson's insurance producer license was suspended in Louisiana
23 effective February 2024 after the Louisiana Department of Insurance found that Dawson
24 failed to report other state actions and failed to respond to their investigation.
25
26

1 e. Dawson's insurance producer license was revoked in Utah effective
2 January 2024 after the Utah Department of Insurance found that Dawson failed to report
3 other state actions and failed to respond to their investigation.

4 f. The investigator further found that Dawson's Connecticut license was
5 revoked in December 2023, his North Carolina license was voluntarily surrendered in
6 September 2023, and his Indiana license was suspended in May 2023.

7
8 6. The only prior state action that Dawson disclosed to the Arizona Department of
9 Insurance and Financial Institutions was the suspension of the Indiana license.

10 **Dawson Response to Investigation**

11 7. On April 18, 2024, the Department's Investigator sent a communication to
12 Dawson requesting that he provide a narrative response with respect to Humana's allegations
13 and the Department's findings of disciplinary action taken against his license in other states.
14 The Department required that he respond by April 24, 2024.

15
16 8. On April 23, 2024, Dawson provided a response wherein he denied that he was
17 responsible for any unauthorized policies and that his Humana appointment and login
18 information was hacked. He also asserted that he had filed a claim with Error & Omissions
19 insurer, Continental Casualty Company ("CNA") to provide representation in appealing the
20 other state actions.

21
22 9. Following Dawson's response, the Department's Investigator reached out to
23 CNA to inquire whether Dawson's hacking claim had any validity and to see if they would
24 provide legal representation. On July 17, 2024, CNA provided a final claim determination
25 showing Dawson's claim had been denied because cyber security was not included in the
26

1 coverage. CNA did not assess the validity of Dawson's assertion that he was not responsible
2 for the alleged fraudulent policies.

3 10. The Department's investigator followed up with Dawson in August 2024,
4 asking for him to provide documentation to substantiate his hacking claims made in the
5 narrative response. No documentation was provided and on August 13, 2024, Dawson
6 responded by requesting to surrender his license.
7

8 CONCLUSIONS OF LAW

9 11. The Director has jurisdiction over this matter.

10 12. Respondent failed to report any administrative action taken against him in
11 another jurisdiction or by another governmental agency within thirty days of the final
12 disposition of the matter as required by A.R.S. § 20-301(A).
13

14 13. Respondent's conduct, as described above, constitutes violating any provision
15 of this title or any rule, subpoena or order of the director, within the meaning of A.R.S. § 20-
16 295(A)(2).

17 14. Respondent has been found to have committed insurance fraud in other
18 jurisdictions as contemplated in A.R.S. § 20-295(A)(7).
19

20 15. Respondent's conduct, as described above, constitutes using fraudulent,
21 coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or
22 financial irresponsibility in the conduct of business in this state or elsewhere, within the
23 meaning of A.R.S. § 20-295(A)(8).
24

25 16. Respondents' conduct, as described above, constitutes having an insurance
26 producer license, or its equivalent, denied, suspended, or revoked in any state, province,

district, or territory pursuant to A.R.S. § 20-295(A)(9).

17. Grounds exists for the Director to suspend, revoke or refuse to renew Respondent's insurance producer license pursuant to A.R.S. §§ 20-295(A)(2), (A)(7), (A)(8), (A)(9), and 20-301(A).

Based upon the foregoing, the Department respectfully requests that the allegations set forth in the February 14, 2025 Amended Notice of Hearing and Complaint be deemed admitted and that Respondent's insurance license be revoked.

RESPECTFULLY SUBMITTED this 11th day of March, 2025.

KRISTIN K. MAYES, Attorney General

By /s/ Zachary Howard
Zachary Howard, Assistant Attorney General
Attorney for the Arizona Department of Insurance
and Financial Institutions

COPY of the foregoing electronically filed this 11th day of March, 2025 with:

Barbara D. Richardson, Cabinet Executive Officer
c/o Deian Ousounov, Chief Financial Deputy Director
Arizona Department of Insurance and Financial Institutions

COPY of the foregoing emailed this same date to:

Alena Caravetta, Regulatory Legal Affairs Officer
Ana Starcevic, Project Specialist
Rachel Smith, Insurance Analyst/Investigator
Arizona Department of Insurance and Financial Institutions

Javon Dawson
Javondawson58@gmail.com
Respondent

COPY of the foregoing mailed this same date to:

Javon Dawson
25144 Inkster Rd.
Southfield, MI 48033
Respondent

/s/ S. Hack