

BEFORE THE INSURANCE COMMISSIONER OF THE
STATE OF OKLAHOMA

FILED

SEP 22 2010

INSURANCE COMMISSIONER
OKLAHOMA

STATE OF OKLAHOMA, ex rel. KIM)
HOLLAND, Insurance Commissioner,)
)
Petitioner,)
)
v.)
)
ANDERSON & STRUDWICK., a non resident)
producer firm)
)
Respondent.)

Case No. 10-1156-DIS

CONDITIONAL ADMINISTRATIVE ORDER
AND NOTICE OF RIGHT TO BE HEARD

COMES NOW the State of Oklahoma, ex rel. Kim Holland, Insurance Commissioner,
by and through her attorney, Julie Meaders, and alleges and states as follows:

JURISDICTION

1. Kim Holland is the Insurance Commissioner of the State of Oklahoma and is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O.S. §§ 101 et seq.

2. Respondent is licensed as a non resident agency firm holding license 12147. Respondent failed to renew this license October 31, 2009. Respondent's address of record is 707 E. Main Street, Floor 20, Richmond, VA 23219.

3. The Insurance Commissioner may place on probation, censure, suspend, revoke or refuse to issue or renew a license issued pursuant to the Oklahoma Producer Licensing Act and/or may levy a fine up to \$1,000.00 for each occurrence of a violation of the Oklahoma Insurance Code, 36 O.S. § 1435.13(A) and (D).

ALLEGATIONS OF FACT

1. Respondent applied for reinstatement of its Oklahoma non-resident agency firm license 12147 in September 2010. Respondent answered “no” to the following question on its application: “Has the business entity or any owner, partner, officer or director, or manager or member of a limited liability company, ever been named or involved as a party in an administrative proceeding regarding any professional or occupational license, or registration?”

2. “Involved” is defined in the application as “having a license censured, suspended, revoked, canceled, terminated; or, being assessed a fine, a cease and desist order, a prohibition order, a compliance order, placed on probation or surrendering a license to resolve an administrative action. “Involved” also means “being named as a party to an administrative or arbitration proceeding, which is related to a professional or occupational license.”

3. A FINRA BrokerCheck report details that Anderson & Strudwick has had eighteen (18) administrative actions regarding its securities license. The Producer Licensing Division found no previously reporting of these administrative actions nor any submitted documents regarding these administrative actions as the application requires: “(a) a written statement identifying the type of license, identifying all parties involved and explaining the circumstances of each incident; (b) a copy of the Notice of Hearing or other documents that states the charges and allegations; (c) a copy of the official document which demonstrates the resolution of the charges or any final judgment.”

ALLEGED VIOLATIONS OF LAW

1. Respondent violated 36 O.S. § 1435.13(A)(1); providing incorrect, misleading, incomplete or materially untrue information in the license application.

ORDER

IT IS THEREFORE ORDERED by the Insurance Commissioner that Anderson & Strudwick. is fined One Hundred Dollars (\$100.00) for each of the eighteen (18) occurrences of failing to disclose an administrative proceeding, totaling ONE THOUSAND EIGHT HUNDRED DOLLARS (\$1,800.00). The \$1,800.00 fine is to be paid immediately by money order or cashiers check made payable to the Oklahoma Insurance Department. Respondent's producer license may be reinstated upon receipt of payment of the fine and reporting of the administrative actions.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Insurance Commissioner that this Order is a Conditional Order. Unless the Respondent requests a hearing with respect to the Allegations of Fact set forth above within thirty (30) days of the date of mailing of this Order, this Order and the penalties set forth above shall become a Final Order on the thirty-first day following the date of mailing this Order. A request for hearing should be in writing addressed to Julie Meaders, Oklahoma Insurance Department, Legal Division, Post Office Box 53408, Oklahoma City, Oklahoma 73152-3408. The request for hearing must state the grounds for the request to set aside or modify the Order.

Any such hearing shall be conducted according to the procedures for contested cases under the Insurance Code and 75 O.S. § 250-323. If the Respondent serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order shall act as notice of the matters to be reviewed at the hearing, and the Allegations of Fact, Alleged Violations of Law, and penalties imposed in this Conditional Order shall be considered withdrawn, pending final resolution at the hearing.

WITNESS My Hand and Official Seal this 22nd day of September 2010.



KIM HOLLAND
INSURANCE COMMISSIONER
STATE OF OKLAHOMA

Julie Meaders

Julie Meaders
Assistant General Counsel
P.O. Box 53408
Oklahoma City, Oklahoma 73152
Telephone: (405) 521-2746
Facsimile: (405) 522-0125

CERTIFICATE OF MAILING

I, Julie Meaders, hereby certify that a true and correct copy of the above and foregoing Conditional Administrative Order and Notice of Right to be Heard was mailed by certified mail, with postage prepaid and return receipt requested, on this 22nd day of September, 2010, to:

Anderson & Strudwick
707 E. Main Street
Floor 20
Richmond, VA 23219

CERTIFIED MAIL NO. 7001 0320 0004 0178 4720

and a copy was delivered to:

Producer Licensing Division



JULIE MEADERS
ASSISTANT GENERAL COUNSEL

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Anderson & Strudwick
 707 E. Main Street, Floor 20
 Richmond, VA 23219
 Legal/10-1156-DIS/mys

2. Article Number

(Transfer from service label)

7001 0320 0004 0178 4720

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

Anderson & Strudwick
 707 E. Main Street, Floor 20
 Richmond, VA 23219
 Legal/10-1156-DIS/mys

See Reverse for Instructions

COMPLETE THIS SECTION ON DELIVERY

A. Signature

M. Strudwick

Agent

Addressee

B. Received by (Printed Name)

Miranda Garcia

C. Date of Delivery

9/28/10

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail

Registered

Return Receipt for Merchandise

Insured Mail

C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

7001 0320 0004 0178 4720

OK 75105

RECEIVED
 VIRGINIA INSURANCE DEPARTMENT
 OCT 01 2010
 Legal Division