

NORTH CAROLINA DEPARTMENT OF INSURANCE  
RALEIGH, NORTH CAROLINA

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

BEFORE THE  
COMMISSIONER OF INSURANCE

IN THE MATTER OF:

THE LICENSURE OF  
LATRICE DAVIS  
(NPN #18906147)

Respondent.

ORDER AND  
FINAL AGENCY DECISION

Docket Number: 2250

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**THIS MATTER** was heard on May 12, 2025 by the undersigned Hearing Officer, as designated by the Commissioner of Insurance ("Commissioner") pursuant to N.C. Gen. Stat. § 58-2-55. The administrative hearing was held in the Hearing Room at the North Carolina Department of Insurance, located at 3200 Beechleaf Court, Raleigh, Wake County, North Carolina.

Petitioner, the Agent Services Division of the North Carolina Department of Insurance ("Petitioner" or "ASD"), was present and represented by Assistant Attorney General Kristin K. Mullins. Matthew Reck, Complaint Analyst for ASD, appeared and testified on behalf of the Petitioner. Respondent, LATRICE DAVIS, ("Respondent") did not appear and was not represented by counsel at the hearing.

Petitioner's Exhibits 1-13 were admitted into evidence.

BASED UPON careful consideration of the evidence, arguments presented at the hearing, and upon the entire record in the proceeding, the Hearing Officer hereby makes the following Findings of Fact and Conclusions of Law:

**FINDINGS OF FACT**

1. The North Carolina Department of Insurance ("Department") is a state agency responsible, in accordance with Chapter 58 of the North Carolina General Statutes, for enforcement of the insurance laws of North Carolina and for regulating and licensing insurance producers.

2. Respondent is a resident of Texas. *See* Pet'r's Exs. 3 and 4.

3. Respondent currently holds an active non-resident North Carolina Insurance Producer License, National Producer Number 18906147, with lines of

authority for Accident & Health or Sickness and Life ("License"). Respondent's North Carolina Non-Resident Producer License was first active in North Carolina on September 13, 2019. *Id.*

4. The Notice of Administrative Hearing and Petition for Administrative Hearing were properly served on Respondent by depositing with a designated delivery service via FedEx – Priority Overnight and was delivered on February 3, 2025 at the address Respondent provided to the Commissioner. *See* Pet'r Exs. 1 and 1a.

5. The Scheduling Order was properly served on Petitioner pursuant to N.C. Gen. Stat. §§ 58-2-69(d) and 58-2-69(e). *See* Pet'r's Exs. 2 and 2a.

6. Matthew Reck ("Mr. Reck") is a Complaint Analyst with ASD, and his job responsibilities include handling licensee enforcement cases for Petitioner. This involves handling Personalized Information Capture System alerts ("PIC alert") received through the National Association of Insurance Commissioners ("NAIC") system. PIC alerts notify Petitioner if another state has taken administrative action against a North Carolina licensee.

7. Mr. Reck was assigned a PIC alert relating to the Respondent, which was entered into NAIC on February 27, 2024 by the State of Illinois Department of Insurance, which indicated an effective date January 17, 2024. *See* Pet'r's Ex. 5. Mr. Reck has handled the investigation of the Petitioner's enforcement file from ASD since the file's inception.

8. During his investigation, Mr. Reck reviewed the contents of Respondent's enforcement file, including Respondent's Licensing Summary Report, *see* Pet'r's Ex. 3, Respondent's State Licensing Report, *see* Pet'r's Ex. 4, Respondent's Report on the Regulatory Information Retrieval System ("RIRS Report"), *see* Pet'r's Ex. 5, and Respondent's National Insurance Producer Registry ("NIPR") Attachment Warehouse, *see* Pet'r's Ex. 6.

9. As part of his investigation, Mr. Reck obtained a copy of the administrative action from the State of Illinois Department of Insurance, more specifically the Order of Suspension signed on January 17, 2024. *See* Pet'r's Ex. 7. The Acting Director of Insurance for the State of Illinois certified, on August 20, 2024, that the document was a true and correct copy of the original now forming a part of the records of the Illinois Department of Insurance. *Id.* The Illinois administrative action states that the Respondent's Illinois insurance license was suspended due to an unpaid income tax liability in the State of Illinois, pursuant to Section 500-700(a)(14) of the Illinois Insurance Code. *Id.* The Order of Suspension was to take effect 30 days from the date of mailing; however, no certificate of service was offered into evidence by Petitioner to indicate when specifically, mailing occurred.



10. A licensee is obligated to report administrative actions to the Department within thirty (30) days of final disposition of the matter. *See* N.C. Gen. Stat. § 58-33-32(k). This requirement can be achieved either by notifying ASD directly or by uploading a copy of the administrative action to the NIPR Attachment Warehouse within thirty (30) days of the disposition of the administrative action.

11. Respondent failed to report the January 17, 2024 Illinois administrative action by directly contacting ASD at any time nor did Respondent upload a copy of the Illinois administrative action to the NIPR Attachment Warehouse. *See* Pet'r's Ex. 6.

12. Accordingly, ASD sent correspondence to Respondent's e-mail address on record, on February 29, 2024, advising Respondent that the Illinois administrative action needed to be reported within thirty (30) days after its disposition on January 17, 2024, in order to be compliant with N.C. Gen. Stat. § 58-33-32(k). *See* Pet'r's Exs. 8 and 9. Respondent was instructed to provide a written response, along with documentation regarding the administrative action, within ten (10) days of receipt of the e-mail. *Id.*

13. Respondent did not respond to the February 29, 2024 correspondence.

14. On March 13, 2024, ASD sent yet another e-mail to Respondent's e-mail address of record. In that e-mail, it was noted that the Respondent failed to provide a response and the requested documentation as requested in ASD's previous correspondence. *See* Pet'r's Exs. 8 and 10. The e-mail communication on March 13, 2024 gave Respondent notice that unless she sent a copy of the Illinois administrative action and a written statement to ASD with ten (10) days, ASD would consider Respondent to be in violation of N.C. Gen. Stat. §§ 58-2-185 and 58-2-195 and may consider proceeding with an administrative action against his license. *Id.*

15. Respondent did not respond to the March 13, 2024 correspondence.

16. Additionally, on April 24, 2024, ASD sent yet another e-mail to Respondent's e-mail address on record. That same day, a copy of the correspondence was also physically mailed to Respondent's residential address on record. *See* Pet'r's Exs. 8 and 11. This correspondence alerted Respondent that she appeared to be in violation of N.C. Gen. Stat. §§ 58-33-46(a)(2) and 58-33-32(k) and informed her that an informal telephonic conference had been scheduled for June 18, 2024 at 2:00 p.m. at the telephone number on record, to discuss the allegations of Respondent's failure to report the Illinois administrative action to the Department. *Id.*

17. Respondent responded to ASD's April 24, 2024 correspondence, on that same day, via telephone. When she called, it was communicated that Respondent

would need to send over the documentation regarding the Illinois administrative action. However, Respondent never provided the requested documentation and has not communicated with ASD since the call on April 24, 2024.

18. Additionally, on June 17, 2024, ASD sent another e-mail to Respondent's e-mail address on record. This correspondence served as a courtesy reminder to Respondent of the Informal Conference scheduled for the next day, June 18, 2024, and again provided the telephone number they would be contacting as indicated as the telephone number on record with the Department. See Pet'r's Exs. 8 and 12.

19. Respondent did not respond to the June 17, 2024, correspondence and did not participate in the informal conference that ASD attempted to conduct as scheduled on June 18, 2024.

20. On July 19, 2024, ASD sent yet another e-mail to Respondent's e-mail addresses on record. That same day, a copy of the correspondence was also physically mailed to the Respondent's residential address on record via the U.S. Postal Service. See Pet'r's Exs. 8 and 13. This July 19, 2024 correspondence gave Respondent notice that formal proceedings would now be instituted, under Article 3A of Chapter 150B, and an Administrative Hearing would be scheduled in Raleigh, N.C. at a time and date to be determined. *Id.*

21. Respondent did not respond to the July 19, 2024, correspondence or any make any further communication with ASD after the telephone conversation on April 24, 2024, despite ASD's multiple attempts to reach Respondent.

### CONCLUSIONS OF LAW

1. This matter is properly before the Commissioner. The Commissioner has jurisdiction over the parties and the subject matter pursuant to Chapter 58 of the North Carolina General Statutes.

2. Respondent was properly served with the Notice of Administrative Hearing and Scheduling Order in this matter, pursuant to N.C. Gen. Stat. §§ 58-2-69(b), 58-2-69(d), and 58-2-69(e).

3. N.C. Gen. Stat. § 58-33-32(k) requires an insurance producer to report to the Commissioner "any administrative action" taken against the producer by another state "within 30 days after the final disposition of the matter." N.C. Gen. Stat. § 58-33-32(k) further specifies that this report "shall include a copy of the order or consent order and other information or documents filed in the proceeding necessary to describe the action."



4. The Illinois Order of Suspension signed on January 17, 2024, constitutes an administrative action taken against Respondent's Illinois license. The language used in the Order of Suspension, specifically provided that "This Order of Suspension shall take effect 30 days from the date of mailing... the suspension will remain in effect until the Licensee proves to the satisfaction of the Department that the Licensee complied with the requirements of Revenue and the Illinois Income Tax Act". See Pet'r Ex. 7. The use of conditional language here, implies that the suspension may be temporary in nature, upon conditions being met (e.g. Respondent's compliance to her Illinois tax obligations.) During testimony at the hearing, ASD alleged that Respondent was required to report the Illinois suspension within 30 days of its effective date, however Petitioner did not provide a sufficient showing of what date constituted the "final disposition of the matter" giving rise to this action as the mailing date of the Illinois Order was never established. Notwithstanding this, Petitioner established that as of the date of the hearing, Respondent had not reported the Illinois administrative action to ASD.

5. Respondent violated N.C. Gen. Stat. § 58-33-32(k) by failing to report the Illinois administrative action taken against her by the State of Illinois Department of Insurance, to the Commissioner within thirty (30) days of the action's effective date.

6. N.C. Gen. Stat. § 58-33-46(a)(2) provides that the Commissioner may place on probation, suspend, revoke or refuse to renew the license of a licensee that has violated any insurance law of this or any other state, violated any administrative rule, subpoena, or order of the Commissioner or of another state's insurance regulator, or violated any rule of FINRA.

7. By violating N.C. Gen. Stat. § 58-33-32, the Respondent violated a North Carolina insurance law within the meaning of N.C. Gen. Stat. § 58-33-46(a)(2).

8. The undersigned also gives weight to the fact that Respondent was unresponsive to multiple pieces of correspondence from the Department regarding the allegations in this case. Pursuant to 11 NCAC 06A .0811(b), the Commissioner may suspend, revoke, or refuse to renew a license if the licensee fails to respond to NCDOT inquiries within seven calendar days after the receipt of the inquiry or request.

9. Based upon the evidence received and the applicable law, the undersigned Hearing Officer concludes that the Respondent's license should be revoked under N.C. Gen. Stat. § 58-33-46(a)(2) for violating N.C. Gen. Stat. § 58-33-32(k) and revoked under 11 NCAC 06A .0811(b) for consistently failing to respond to the Department inquiries. Respondent has therefore given no indication of interest in retaining the North Carolina insurance license issued by the Department.

**BASED UPON** the foregoing Findings of Fact and Conclusions of Law, the Hearing Officer enters the following:

**ORDER**

It is **ORDERED** that Respondent's non-resident North Carolina Insurance Producer license is hereby **REVOKED** effective as of the date of the signing of this Order.

This the 20<sup>th</sup> day of November, 2025.

A solid black rectangular box used to redact the signature of the Hearing Officer.

Alisha Benjamin  
Hearing Officer  
N.C. Department of Insurance

### **APPEAL RIGHTS**

This is a Final Agency Decision issued under the authority of N.C. Gen. Stat. § 150B, Article 3A.

Under the provisions of N.C. Gen. Stat. § 150B-45, any party wishing to appeal a final decision of the North Carolina Department of Insurance must file a Petition for Judicial Review in the Superior Court of the County where the person aggrieved by the administrative decision resides, or in the case of a person residing outside the State, the county where the contested case which resulted in the final decision was filed. The appealing party must file the petition within 30 days after being served with a written copy of the Order and Final Agency Decision. In conformity with 11. NCAC 01.0413 and N.C. Gen. Stat. § 1 A-1, Rule 5, this Order and Final Agency Decision was served on the parties on the date it was placed in the mail as indicated by the date on the Certificate of Service attached to this Order and Final Agency Decision. N.C. Gen. Stat. § 150B-46 describes the contents of the Petition, including explicitly stating what exceptions are taken to the decision or procedure and what relief the petitioner seeks, and requires service of the Petition by personal service or by certified mail upon all who were parties of record to the administrative proceedings. The mailing address to be used for service on the Department of Insurance is: Amy Funderburk, General Counsel, 1201 Mail Service Center, Raleigh, NC 27699-1201.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing **ORDER AND FINAL AGENCY DECISION** by mailing a copy of the same via certified U.S. Mail, return receipt requested, and via first class U.S. mail to the licensee, at the address provided to the Commissioner, pursuant to N.C. Gen. Stat. § 58-2-69(b); via courtesy e-mail to Respondent; and via State Courier to Attorney for Petitioner, addressed as follows:

Latrice Davis  
11700 Luna Road, Apt. #16202  
Farmers Branch, TX 75234-6299  
[latricedavis1@yahoo.com](mailto:latricedavis1@yahoo.com)  
(Respondent)

**Certified Mail Tracking Number: 9589 0710 5270 3764 5801 12**

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(Attorney for Petitioner)

This the 26<sup>th</sup> day of November, 2025.



Raheema I. Moore  
Clerk of Court for Administrative Hearings  
Paralegal III  
N.C. Department of Insurance  
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