

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  
SANIA RHAMAN  
(NPN # 17676485)

Respondent.

ORDER AND  
FINAL AGENCY DECISION

Docket Number: 2272

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**THIS MATTER** was heard on April 28, 2025, by the undersigned Hearing Officer, as designated by the North Carolina Commissioner of Insurance (“Commissioner”) pursuant to N.C. Gen. Stat. § 58-2-55 and other applicable statutes and regulations. The administrative hearing was held in the North Carolina Department of Insurance’s Hearing Room, Room # 211, located at 3200 Beechleaf Court, Raleigh, Wake County, North Carolina.

Petitioner, the Agent Services Division of the North Carolina Department of Insurance (“Petitioner” or “Agent Services”), was present and represented by Assistant Attorney General Rebecca E. Lem. Respondent, Sania Rhaman (“Respondent”) did not appear and was not represented by counsel at the hearing.

Petitioner moved to amend the Notice of Administrative Hearing to correct the Respondent’s National Producer Number. Petitioner’s motion to amend was GRANTED.

Petitioner moved, pursuant to 11 NCAC 01 .0423(a)(1), for the imposition of sanctions due to Respondent’s failure to appear at the hearing. Petitioner’s motion for sanctions was DENIED. The undersigned Hearing Officer allowed Petitioner to continue with its presentation of testimony and evidence in this matter.

Jeff Miller, Complaint Analyst with Agent Services, appeared and testified on behalf of the Petitioner.

Petitioner’s Exhibits 1-9, and all subparts were admitted into evidence with redactions from Petitioner’s Exhibits 3-5 and 8.

BASED UPON careful consideration of the documentary and testimonial evidence introduced 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 ("NCDOI") is a state agency responsible for enforcement of the insurance laws of North Carolina and for regulating and licensing insurance producers, in accordance with Chapter 58 of the North Carolina General Statutes.

2. At all relevant times herein, Respondent held a non-resident North Carolina Insurance Producer License, National Producer License Number 17676485, with lines of authority in Personal, Accident and Health or Sickness, Life, and Med Supplement/Long Term Care ("License"). See Pet'r's Exs. 3 and 4. Respondent's License was first active in North Carolina on August 26, 2015. *Id.*

3. Pursuant to 11 NCAC .06A.0101(a)(2), Agent Services is the division of the NCDOI responsible for the licensing, education, and regulation of agents and other licensees. Pursuant to N.C. Gen. Stat. § 58-33-10(1), an "agent" is defined as a person licensed to solicit applications for, or to negotiate a policy of, insurance. Pursuant to N.C. Gen. Stat. § 58-33-10(7), an "insurance producer" or "producer" means a person required to be licensed under Article 33 of Chapter 58 of the North Carolina General Statutes to sell, solicit, or negotiate insurance, and "insurance producer" or "producer" includes an agent and a broker. As a licensed insurance producer, Respondent is considered an "agent" as defined by statute and is therefore subject to the licensing, education, and regulation of Agent Services. See N.C. Gen. Stat. §§ 58-33-10(1), 58-33-10(7), and 11 NCAC .06A.0101(a)(2).

4. At all relevant times, Respondent has held a resident (home state) insurance producer license issued by the state of Florida. Respondent's residential, business, and mailing addresses on record with the NCDOI are located in Florida. Respondent's residential address and mailing address are identical. See Pet'r's Exs. 3 and 4.

5. On March 6, 2025, a copy of the Notice of Administrative Hearing and Petition for Administrative Hearing were deposited in the United States Postal Service via first-class mail and via certified mail, return receipt requested, to Respondent at Respondent's residential address and business address of record and at an additional address discovered through LexisNexis. See Pet'r's Exs. 2-4.

6. The Notice of Administrative Hearing and Petition for Administrative Hearing were properly served on Respondent by depositing in the United States



Postal Service via first-class mail and via certified mail, return receipt requested, pursuant to N.C. Gen. Stat. §§ 58-2-69(b), (d), and (e) and Rule 4 of the North Carolina Rules of Civil Procedure. *See* Pet'r's Ex. 2. The certified mail to Respondent's business address was delivered and the first-class mail was not returned. *Id.*

7. Jeff Miller is a Complaint Analyst with Agent Services, and his job responsibilities include handling enforcement files for Agent Services. This includes handling an investigation of a licensee if another state takes administrative action against the licensee. Administrative actions are reflected on the Regulatory Information Retrieval System ("RIRS") report, which is an automatic notification system through the National Association of Insurance Commissioners ("NAIC"). This system generates Personalized Information Capture System alerts ("PIC alert") that notify the NCDOI if another state has taken administrative action against a North Carolina licensee. Mr. Miller was assigned all PIC alerts pertaining to Respondent and he handled the investigation of Respondent's enforcement file from Agent Services through the date of the hearing.

8. Agent Services became aware of an adverse administrative action against Respondent that the New York State Department of Financial Services entered into NAIC on September 13, 2022. *See* Pet'r's Ex. 5.

9. Effective September 9, 2022, the New York State Department of Financial Services ("New York") assessed Respondent a monetary penalty through a stipulation (voluntary agreement) for failure to disclose her criminal record on a license application, and failure to timely report a criminal prosecution. *See* Pet'r's Ex. 9a.

10. A licensee may report an administrative action by uploading a copy of the administrative action to the National Insurance Producer Registry ("NIPR") Attachment Warehouse or reporting the administrative action directly to the NCDOI via mail, e-mail, or fax.

11. Pursuant to N.C. Gen. Stat. § 58-33-32(k), a licensee is obligated to report any administrative action taken against the licensee to the NCDOI within thirty (30) days. The NIPR Attachment Warehouse screenshot shows that Respondent had not reported the administrative action from New York. *See* Pet'r Ex. 6.

12. On September 21, 2022, Agent Services sent correspondence via e-mail to Respondent's e-mail addresses of record informing Respondent that Agent Services was aware of the unreported New York administrative action and instructing Respondent to provide Agent Services with a written response, along with documentation regarding the New York administrative action within ten (10) days. *See* Pet'r's Exs. 7a and 8. At the time of this correspondence, Respondent was still



within the statutorily required thirty (30) days to report the New York administrative action. Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. *See* Pet'r's Ex. 8. Respondent failed to provide any response to this correspondence.

13. On October 5, 2022, Agent Services sent a follow-up correspondence via e-mail to Respondent's e-mail addresses of record noting that Respondent had failed to provide the documents requested in the September 21, 2022 correspondence. *See* Pet'r's Exs. 7b and 8. At the time of this correspondence, Respondent was still within the statutorily required thirty (30) days to report the New York administrative action. Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. *See* Pet'r's Ex. 8. Respondent failed to provide any response to this correspondence.

14. On November 21, 2022, Agent Services sent correspondence via first-class mail to Respondent's residential address of record and e-mail to Respondent's e-mail addresses of record requesting that Respondent attend an informal conference to discuss the September 9, 2022 New York administrative action. The informal conference was scheduled for Respondent on December 14, 2022, at 2:00 p.m. eastern time via the telephone. *See* Pet'r's Exs. 7c and 8. The first-class mail was returned undeliverable for insufficient address and unable to forward. *Id.* Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. *See* Pet'r's Ex. 8. Respondent failed to provide any response to this correspondence.

15. At the appointed time for the December 14, 2022 informal telephonic conference, Agent Services' call to Respondent went straight to a message stating that the voicemail box had not been set up. *See* Pet'r's Ex. 8.

16. Agent Services contacted the Florida insurance regulator to see if they had alternative contact information for Respondent. They provided an additional e-mail address ([sania.rhaman@bcbsfl.com](mailto:sania.rhaman@bcbsfl.com)) but did not have another physical address for Respondent. *See* Pet'r's Ex. 8.

17. On February 7, 2023, Agent Services sent correspondence via first-class mail to Respondent's residential address of record and e-mail to Respondent's e-mail addresses of record, including the additional e-mail address from Florida, requesting that Respondent attend a second informal conference to discuss the September 9, 2022 New York administrative action. The second informal conference was scheduled for Respondent on February 21, 2023, at 2:00 p.m. eastern time via the telephone. *See* Pet'r's Exs. 7d and 8. The first-class mail was returned undeliverable for insufficient address and unable to forward. *Id.* Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. *See* Pet'r's Ex. 8. Respondent failed to provide any response to



this correspondence.

18. At the appointed time for the February 21, 2023 informal telephonic conference, Agent Services' call to Respondent went straight to a message stating that the voicemail box had not been set up. *See* Pet'r's Ex. 8. Agent Services also tried Respondent's business phone number of record, but it went to a voicemail box that did not belong to Respondent. *Id.*

19. On February 21, 2023, Agent Services sent correspondence via first-class mail to Respondent's residential address of record and e-mail to Respondent's e-mail addresses of record, including the additional e-mail address from Florida, advising Respondent that she failed to respond to the NCDOI's repeated attempts to resolve this matter and she failed to appear at both informal telephonic conferences. This correspondence informed Respondent that formal proceedings would 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. *See* Pet'r's Ex. 7e. The first-class mail was returned undeliverable for insufficient address and unable to forward. *Id.* Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. *See* Pet'r's Ex. 8. Respondent failed to provide any response to this correspondence.

20. Before the matter could be scheduled for hearing, Agent Services became aware of an adverse administrative action against Respondent that the Louisiana Department of Insurance entered into NAIC on April 14, 2023. *See* Pet'r's Exs. 5 and 9b. Effective April 13, 2023, the Louisiana Department of Insurance ("Louisiana") revoked Respondent's insurance producer license for failure to timely report the September 9, 2022 New York administrative action, and for failure to submit required documentation. *Id.*

21. The NIPR Attachment Warehouse shows that Respondent did not report the Louisiana administrative action within thirty (30) days from its effective date of April 13, 2023. *See* Pet'r's Ex. 6. Furthermore, Respondent did not report the April 13, 2023 Louisiana administrative action directly to the NCDOI.

22. Effective on or about April 21, 2023, the Kansas Department of Insurance ("Kansas") issued a license denial against Respondent for a misstatement on the licensee's application, for failure to make a disclosure on the license application, for a criminal record, and for Respondent's subsequent failure to respond to inquiries within fifteen (15) business days as required by K.S.A. 40-4909(a)(17). *See* Pet'r's Exs. 5 and 9c.

23. The NIPR Attachment Warehouse shows that Respondent did not report the Kansas administrative action within thirty (30) days from its effective date of on or about April 21, 2023. *See* Pet'r's Ex. 6. Furthermore, Respondent did not report

the April 21, 2023 Kansas administrative action directly to the NCDOL.

24. Effective on or about May 31, 2023, the Alaska Department of Commerce, Community and Economic Development, Division of Insurance ("Alaska") issued a license denial against Respondent for a misstatement on a renewal license application, for Respondent's failure to make disclosure on the license application regarding the New York administrative action, and for Respondent's failure to timely report the New York administrative action. See Pet'r's Exs. 5 and 9d. The Alaska administrative action noted the order was effective on May 5, 2023, and it was signed on May 31, 2023, noting that the denial was adopted and constituted the final order in the matter. Alaska entered the adverse administrative action into NAIC on June 2, 2023, and noted an effective date of May 20, 2023. *Id.*

25. The NIPR Attachment Warehouse shows that Respondent did not report the Alaska administrative action within thirty (30) days from its effective date of on or about May 31, 2023. See Pet'r's Ex. 6. Furthermore, Respondent did not report the May 31, 2023 Alaska administrative action directly to the NCDOL. Although the actual effective date of the Alaska administrative action is ambiguous, Respondent never reported this administrative action to the NCDOL.

26. On June 14, 2023, Agent Services sent correspondence via e-mail to Respondent's personal e-mail address of record noting that Agent Services had been attempting to reach her regarding administrative actions in New York, Kansas, and Alaska. See Pet'r's Ex. 7f. Respondent failed to provide any response to this correspondence.

27. On September 5, 2023, Agent Services sent correspondence via first-class mail to Respondent's residential address of record and e-mail to Respondent's e-mail addresses of record, including the additional e-mail address from Florida, requesting that Respondent attend an informal conference to discuss the New York, Louisiana, Kansas, and Alaska administrative actions. The informal conference was scheduled for Respondent on October 4, 2023, at 11:30 a.m. eastern time via the telephone. See Pet'r's Exs. 7g and 8. The first-class mail was returned undeliverable for insufficient address and unable to forward. Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. See Pet'r's Ex. 8. Respondent failed to provide any response to this correspondence.

28. At the appointed time for the October 4, 2023 informal telephonic conference, Agent Services called Respondent at the phone number on record and a person with a female-sounding voice picked up but indicated that it was the wrong number for Respondent. See Pet'r's Ex. 8. Agent Services conferred with legal counsel and obtained additional possible e-mail addresses for Respondent. *Id.*



29. On November 16, 2023, Agent Services sent an e-mail to the additional e-mail addresses that were located for Respondent. The e-mail addresses were [realtitans4@gmail.com](mailto:realtitans4@gmail.com) and [agentlicensing@selectquote.com](mailto:agentlicensing@selectquote.com). The e-mail to the former address bounced back as undeliverable. A response was received from the e-mail to the latter address indicating that Respondent no longer worked there, and they provided a last known e-mail address which the NCDOL already had on record for Respondent. *See* Pet'r's Exs. 7h and 8.

30. Effective December 12, 2023, the Commonwealth of Virginia State Corporation Commission Bureau of Insurance ("Virginia") revoked Respondent's insurance producer license for failure to report the administrative actions she had received in Louisiana, Kansas, and Alaska. *See* Pet'r's Exs. 5 and 9e.

31. The NIPR Attachment Warehouse shows that Respondent did not report the Virginia administrative action within thirty (30) days from its effective date of December 12, 2023. *See* Pet'r's Ex. 6. Furthermore, Respondent did not report the December 12, 2023 Virginia administrative action directly to the NCDOL.

32. Effective April 16, 2024, the Delaware Department of Insurance ("Delaware") revoked Respondent's insurance producer license for failure to report the administrative action she had received in Louisiana, as well as issued a monetary penalty. *See* Pet'r's Exs. 5 and 9f.

33. The NIPR Attachment Warehouse shows that Respondent did not report the Delaware administrative action within thirty (30) days from its effective date of April 16, 2024. *See* Pet'r's Ex. 6. Furthermore, Respondent did not report the April 16, 2024 Delaware administrative action directly to the NCDOL.

34. On February 7, 2025, Agent Services sent correspondence via e-mail to Respondent's e-mail addresses of record and first-class mail to Respondent's residential address of record, as well as two additional physical addresses located in a LexisNexis search advising Respondent that she failed to respond to the NCDOL's repeated attempts to resolve this matter and failed to appear at the informal telephonic conferences. This correspondence informed Respondent that formal proceedings would 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. *See* Pet'r's Ex. 7i. The first-class mail to one of the additional addresses found through LexisNexis (7639 Sloewood Drive, Leesburg, FL) was returned undeliverable. *See* Pet'r's Ex. 8. Agent Services did not receive a bounce-back message or any other indication that the e-mails sent to Respondent were not delivered. *Id.* Respondent failed to provide any response to this correspondence.

35. As of the date of the hearing, Respondent failed to respond to any of Agent Services' numerous attempts to contact her and failed to report the New York,

Louisiana, Kansas, Alaska, and Delaware administrative actions to the NCDOL.

### **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 (“Notice”) and Petition for Administrative Hearing (“Petition”) pursuant to N.C. Gen. Stat. §§ 58-2-69(d) and (e) and Rule 4 of the North Carolina Rules of Civil Procedure. Service of the Notice and Petition to Respondent’s residential address of record was complete on or about March 11, 2025. *See* Pet’r’s Ex. 2. The Notice and Petition to Respondent’s business address of record was delivered on March 10, 2025. *Id.*

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 in another state within 30 days after the final disposition of the matter and to include a copy of the order or consent order and other information or documents filed in the proceeding necessary to describe the action. Respondent was required to report the New York administrative action (effective September 9, 2022), the Louisiana administrative action (effective April 13, 2023), the Kansas administrative action (effective on or about April 21, 2023), the Alaska administrative action (effective on or about May 31, 2023), the Virginia administrative action (effective December 12, 2023), and the Delaware administrative action (effective April 16, 2024) within thirty (30) days of each action’s effective date.

4. Respondent’s failure to report and provide copies of the New York administrative action within thirty (30) days after September 9, 2022, the Louisiana administrative action within thirty (30) days after April 13, 2023, the Kansas administrative action within thirty (30) days after April 21, 2023, the Alaska administrative action within thirty (30) days after May 31, 2023, the Virginia administrative action within thirty (30) days after December 12, 2023, and the Delaware administrative action within thirty (30) days after April 16, 2024 are violations of N.C. Gen. Stat. § 58-33-32(k).

5. N.C. Gen. Stat. § 58-33-46(a)(2) allows the Commissioner to place on probation, suspend, or revoke the license of a licensee who 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.



6. Respondent's non-resident insurance producer license is subject to disciplinary action due to Respondent's violations of N.C. Gen. Stat. § 58-33-32(k) for failing to timely report the New York administrative action, the Louisiana administrative action, the Kansas administrative action, the Alaska administrative action, the Virginia administrative action, and the Delaware administrative action within thirty (30) days of each action's final disposition.

7. N.C. Gen. Stat. § 58-2-70(c) provides that if, under subsection (b) of this section, the Commissioner finds a violation of this Chapter, the Commissioner may, in addition to or instead of suspending or revoking the license, order the payment of a monetary penalty as provided in subsection (d) of this section. Respondent's failure to report and provide copies of the New York administrative action, the Louisiana administrative action, the Kansas administrative action, the Alaska administrative action, the Virginia administrative action, and the Delaware administrative action within thirty (30) days of each action's final disposition subjects Respondent's non-resident insurance producer license to suspension or revocation in accordance with N.C. Gen. Stat. § 58-2-70(b).

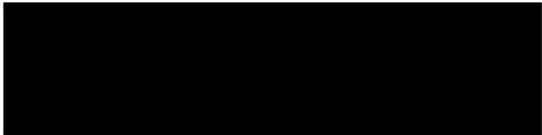
8. Respondent's offenses are further aggravated by Respondent's failure to respond to any of Agent Services' numerous inquiries seeking information and documents or any of the three (3) informal telephonic conference attempts, in violation of N.C. Gen. Stat. §§ 58-2-185 and 58-2-195. Furthermore, Respondent failed to provide notice to the NCDOI of any change to her contact information, including her e-mail address and residential address of record in violation of N.C. Gen. Stat. § 58-2-69(b).

### ORDER

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

It is ORDERED that Respondent's non-resident insurance producer license issued by the North Carolina Department of Insurance is hereby **REVOKED**, effective five (5) days from the signing of this Order.

This the 24<sup>th</sup> day of June, 2025.

  
Shannon Wharry  
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 first class U.S. mail to the licensee at the residential address provided to the Commissioner pursuant to N.C. Gen. Stat. § 58-2-69(b) and (d); and via State Courier to Attorney for Petitioner, addressed as follows:

Sania Rhaman  
1065 Regal Pointe Ter  
Lake Mary, FL 32746-2037  
(Respondent)

**Certified Mail Tracking Number: 9589 0710 5270 0742 5904 46**

Sania Rhaman  
10400 S Federal Hwy  
Port Saint Lucie, FL 34952-5600  
(Respondent)

**Certified Mail Tracking Number: 9589 0710 5270 0742 594 53**

Sania Rhaman  
7639 Sloewood Dr  
Leesburg, FL 34748-2595  
(Respondent)

**Certified Mail Tracking Number: 9589 0710 5270 0742 5904 60**

Sania Rhaman  
3177 Newmark Dr  
Deltona, FL 32738-4498  
(Respondent)

**Certified Mail Tracking Number: 9589 0710 5270 0742 5904 77**

Rebecca E. Lem  
Assistant Attorney General  
N.C. Department of Justice  
Insurance Section  
9001 Mail Service Center  
Raleigh, NC 27699-9001  
(Attorney for Petitioner)

This the 4<sup>th</sup> day of June, 2025.



Raheema I. Moore  
Clerk of Court for Administrative Hearings  
Paralegal III  
N.C. Department of Insurance  
General Counsel's Office  
1201 Mail Service Center  
Raleigh, NC 27699-1201