

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  
CHRISTA MARIE WALDROP  
(NPN# 19894067)

Respondent.

ORDER AND  
FINAL AGENCY DECISION

Docket Number: 2284

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**THIS MATTER** was heard on May 19, 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. The administrative hearing was held in the hearing room of the North Carolina Department of Insurance, located at 3200 Beechleaf Court, Raleigh, North Carolina.

Petitioner Agent Services Division of the North Carolina Department of Insurance ("Petitioner" or "ASD") was represented by Assistant Attorney General, Nicholas B. Sorensen. Jeffrey Miller, Complaint Analyst with ASD ("Miller"), appeared and testified on behalf of Petitioner. Respondent Christa Marie Waldrop ("Respondent") failed to appear and was not represented by counsel at the hearing.

The undersigned Hearing Officer accepted and considered testimony and evidence offered by ASD in support of the Petition at the hearing. *See* Pet'r's Ex. 1. Pet'r's Exs. 1-17 were admitted into evidence.

The Petition for Administrative Hearing alleged that Respondent was subject to administrative action pursuant to: (1) N.C. Gen Stat. § 58-33-46(a)(1) for providing materially incorrect, misleading, incomplete, or materially untrue information in her license application; (2) N.C. Gen Stat. § 58-33-46(a)(2) for violating N.C. Gen Stat. § 58-33-32(k) by failing to report another state's administrative action, along with violating N.C. Gen. Stat. § 58-2-69 by failing to timely report criminal convictions, and finally for violating N.C. Gen Stat. §§ 58-2-185 and 58-2-195 for failing to respond to Petitioner's request for information during the course of its investigation; (3) N.C. Gen Stat. § 58-33-46(a)(3) for obtaining a license through misrepresentation or fraud; and (4) pursuant to N.C. Gen. Stat. § 58-33-46(a)(9) for having her license denied in Kansas for reasons substantially to those listed in N.C. Gen. Stat. § 58-33-46(a). *See* Pet'r's Ex. 1.

BASED UPON careful consideration of the evidence, arguments presented at the hearing by ASD, 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, in accordance with Chapter 58 of the North Carolina General Statutes, for the enforcement of the insurance laws of North Carolina and for regulating and licensing insurance producers.

2. Subsections (b), (d), and (e) of N.C. Gen. Stat. § 58-2-69 provide authority to the Commissioner to give notice to any licensee by sending such notices by first-class mail to the address or addresses that a licensee provides to the Commissioner pursuant to N. C. Gen. Stat. § 58-2-69(b). Respondent provided the following address to the Commissioner (*see* Pet'r's Exs. 1-3):

CHRISTA MARIE WALDROP  
6389 STUMPH RD.  
PARMA HEIGHTS, OH 44130-2926

3. The Certificate of Service and Affidavit of Service indicates that copies of the Notice of Hearing and Petition were deposited with a designated delivery service, FedEx – Priority Overnight, addressed to Respondent as indicated at 6389 Stumph Road, Parma Heights, Ohio 44130-2926 on April 14, 2025. The documents were successfully delivered to Respondent on April 18, 2025 at the address on record with the Commissioner. *See* Pet'r's Exs. 1 and 2.

4. On June 12, 2020, Respondent was convicted of a misdemeanor, Case No. 20CRB00082, in the Mayor's Court of Parma Heights, Ohio. *See* Pet'r's Ex. 8.

5. On June 1, 2021, Respondent was convicted of a misdemeanor, Case No. 21CRB00091, in the Mayor's Court of Parma Heights, Ohio. *See* Pet'r's Ex. 8.

6. On June 7, 2021, Respondent submitted an application to the Kansas Department of Insurance ("Kansas"), seeking a nonresident insurance producer license in that state. Respondent responded "No" when questioned on her application regarding whether she had prior misdemeanor convictions. *See* Pet'r's Ex. 10.

7. On June 7, 2021, Respondent submitted an application to NCDOI seeking a North Carolina nonresident insurance producer license. Respondent responded "No" when questioned on her application regarding whether she had prior misdemeanor convictions. *See* Pet'r's Ex. 6.



8. Respondent was granted a nonresident Insurance Producer License (“License”) in North Carolina on June 7, 2021. Respondent’s License remains active, and she holds lines of authority in property and casualty. *See* Pet’r’s Ex. 3.

9. On March 2, 2022, Respondent was convicted of a misdemeanor, case number 22CRN00013, in the Mayor’s Court of Parma Heights, Ohio. *See* Pet’r’s Ex. 8.

10. On March 20, 2023, Respondent was convicted of a misdemeanor, case number 23CRB00013, in the Mayor’s Court of Parma Heights, Ohio. *See* Pet’r’s Ex. 8.

11. On July 7, 2023, Respondent was convicted of two misdemeanors, case numbers 23CRB00064 and 23CRB00065, in the Mayor’s Court of Parma Heights, Ohio. *See* Pet’r’s Ex. 8.

12. On October 10, 2024, Respondent submitted a reinstatement application for her nonresident insurance producer license to Kansas. On her reinstatement application, Respondent answered ‘yes’ when questioned regarding whether she had ever been convicted of a misdemeanor. *See* Pet’r’s Ex. 10.

13. On October 10, 2024, Respondent uploaded to the NIPR attachment warehouse criminal records from the State of Ohio. These records covered case numbers 20CRB00082, 21CRB00091, 22CRN00013, 23CRB00013, 23CRB00064 and 23CRB00065 from the Parma Heights Mayor’s Court. *See* Pet’r’s Exs. 7 and 8.

14. On October 16, 2024, Respondent uploaded to the NIPR attachment warehouse personal statements detailing the circumstances of her criminal convictions. *See* Pet’r’s Exs. 7, 9, and 17.

15. On November 12, 2024, Kansas issued Respondent a Decision on License Application (“Kansas Denial”), denying Respondent’s reinstatement application in that state. The Kansas Denial cited Respondent’s failure to disclose her 2020 and 2021 criminal convictions on her June 7, 2021 application as grounds for denial pursuant to K.S.A. 40-4909(a)(1). This statute gives Kansas grounds to deny an application if the applicant “provided incorrect, misleading, incomplete, or untrue information” in the license application. *See* K.S.A. 40-4909. *See also* Pet’r’s Ex. 10.

16. The Kansas Denial additionally cited K.S.A. 40-4909(a)(2) as grounds for denying Respondent’s reinstatement application. This law gave Kansas authority to deny an application if the applicant was found to have violated a provision of the Kansas Insurance Code. Kansas found that Respondent had violated K.S.A. 40-4905(f)(1)(D) which required licensees to report all details of any misdemeanor conviction within 30 days of the occurrence. Respondent violated this provision of the

Kansas Insurance Code by not reporting the 2022 and 2023 criminal misdemeanor convictions to Kansas within 30 days of each occurrence. *See* Pet'r's Exs. 8 and 10.

17. On January 4, 2025, Kansas entered information regarding the Kansas Denial into the RIRS report maintained by the NAIC. *See* Pet'r's Ex. 5.

18. Miller is a Complaint Analyst with ASD and, as part of his job responsibilities, handles enforcement files for ASD. Enforcement files include responding to complaints and handling Personalized Information Capture System's Alerts ("PIC Alerts") received through the NAIC system. PIC Alerts are sent to NCDOT by NAIC if another state takes administrative action against a North Carolina licensee and enters the information into the system. Miller was assigned the PIC Alert relating to Respondent after the Kansas Denial was entered into the NAIC system on January 4, 2025. *See* Pet'r's Ex. 5. Miller handled the investigation of Petitioner's enforcement file from initial assignment up until the date of the hearing.

19. Miller, during his investigation, reviewed various documents relating to Respondent. These documents included Respondent's state-based system licensee summaries (*see* Pet'r's Ex. 3), Respondent's state licensing reports from the NAIC Producer Database (*see* Pet'r's Ex. 4), Respondent's reports listed on the Regulatory Information Retrieval System ("RIRS") (*see* Pet'r's Ex. 5), and Respondent's NIPR attachment warehouse. *See* Pet'r's Ex. 7.

20. Miller, as part of his enforcement investigation relating to Respondent, obtained a copy of the Kansas Denial. *See* Pet'r's Ex. 10. Miller determined that the Denial had not been reported to the Commissioner within 30 days of its final disposition as required by N.C. Gen. Stat. § 58-33-32(k).

21. During his review of the Kansas Denial, Miller determined that none of the criminal convictions cited by Kansas had been reported to the Commissioner. This included Respondent's misrepresentation that she had never been convicted of a misdemeanor on her June 7, 2021 North Carolina license application, which was contradicted by her June 12, 2020 and June 1, 2021 misdemeanor criminal convictions from Ohio. Miller also determined that, once licensed, Respondent had failed to report the March 3, 2022, March 20, 2023 and the two July 7, 2023 Ohio convictions to the Commissioner within 10 days of the convictions, as required by N.C.G.S. § 58-2-69(c). *See* Pet'r's Exs. 7-10.

22. Miller, as part of his investigation, obtained a copy of documents uploaded by Respondent into the NIPR attachment warehouse. This included criminal records from Ohio loaded into the warehouse by Respondent on October 10, 2024, and personal statements regarding the criminal convictions on October 16, 2024. *See* Pet'r's Exs. 7-9, and 17.



23. On January 10, 2025, Miller e-mailed a request for response to Respondent's e-mail address she had provided to the Commissioner, [c.waldrop666@gmail.com](mailto:c.waldrop666@gmail.com). Miller informed Respondent that she had not reported the Kansas Denial and that it was now considered late. Mr. Miller provided his contact information in the e-mail. Respondent did not respond to Miller's requests for documents and information. See Pet'r's Ex. 11.

24. On January 23, 2025, Miller sent follow-up correspondence to Respondent's email address she had provided to the Commissioner. Miller requested a response to the correspondence previously sent on January 10, 2025. Miller informed Respondent that ASD could consider Respondent in violation of N.C. Gen. Stat. §§ 58-2-185 and 58-2-195 if she failed to respond to this written inquiry. The correspondence notified Respondent that the Petitioner could proceed with administrative action if she did not respond within 10 days. Mr. Miller provided his contact information in the e-mail. Respondent did not reply to this correspondence or otherwise reach out to Mr. Miller. See Pet'r's Ex. 12.

25. On February 12, 2025, Mr. Miller e-mailed an informal conference notice to Respondent and also mailed a copy of the notice to her current mailing address of record, 6389 Stumph Rd., Parma Heights, Ohio. The letter informed Respondent that she had failed to report the Kansas Denial and her multiple criminal convictions within 10 days despite representing that she did not have any misdemeanor criminal convictions on her June 7, 2021 application. This May 15, 2024 correspondence also informed Respondent that a Telephonic Informal Conference had been scheduled for March 13, 2025, at 11:30 a.m., to discuss these allegations further. Mr. Miller stated in the correspondence that Respondent would be contacted at (440) 666-6447, her phone number reported to the Commissioner, for the conference. See Pet'r's Exs. 3 and 13.

26. Miller attempted to hold the Informal Conference with Respondent and his supervisor, Nadine Scott, on March 13, 2025, at 11:30 a.m. to further discuss the allegations raised in the Informal Conference Notice. Miller contacted Respondent at the phone number listed on the conference notice, which she had provided to the Commissioner, (440) 666-6447. Respondent did not answer the call, and Mr. Miller left a voicemail. See Pet'r's Exs. 3 and 13.

27. On March 18, 2025, Miller sent "Proceed to Hearing" letters to Respondent via e-mail and USPS first-class mail. These letters were sent to the previously used addresses which had been reported to the Commissioner by Respondent. This correspondence provided notice that, due to Respondent's failure to respond to repeated attempts to informally resolve the matter, Petitioner would seek

a formal hearing. Petitioner alleged violations of N.C. Gen. Stat. §§ 58-2-69(c) and 58-33-32(k) as possible grounds for administrative action pursuant to N.C. Gen. Stat. § 58-33-46(a)(2). Petitioner further alleged that Respondent's failure to disclose misdemeanor convictions on the June 7, 2021 application could be grounds for administrative action pursuant to N.C. Gen. Stat. § 58-33-46(a)(1). *See* Pet'r's Exs. 14-15.

28. At no point has Respondent replied to inquiries from Petitioner or otherwise reached out to Petitioner regarding this matter.

29. At the hearing, Miller recounted his investigation and testified that Petitioner was seeking a revocation of Respondent's license.

BASED UPON the foregoing Findings of Fact, the undersigned Hearing Officer makes the following:

### **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. Despite proper service of the Notice of Administrative Hearing and the Petition for Administrative Hearing upon Respondent in this matter pursuant to N.C. Gen. Stat. § 58-2-69 (b), (d), and (e), Respondent failed to attend the May 19, 2025, hearing. *See* Pet'r's Exs. 1 and 2.

3. N.C. Gen. Stat. § 58-33-46(a) provides grounds for the Commissioner to "place on probation, suspend, revoke, or refuse to renew" an insurance producer's license.

4. N.C. Gen. Stat. § 58-33-46(a)(1) authorizes the Commissioner to revoke Respondent's License if she provided materially incorrect, misleading, incomplete, or materially untrue information on her license application.

5. On her June 7, 2021 application, Respondent was questioned whether she had prior misdemeanor convictions, and she responded 'no' despite having two misdemeanor convictions pre-existing the application. The undersigned finds that this was materially incorrect or untrue information which was provided on a license application.

6. N.C. Gen. Stat. § 58-33-46(a)(3) authorizes the Commissioner to revoke a license if it was obtained through misrepresentation or fraud.



7. The Commissioner granted Respondent her license on June 7, 2021. The Commissioner relied upon Respondent's representation that she did not have misdemeanor criminal convictions when granting her license. As discussed above, this was a misrepresentation by Respondent and therefore the undersigned finds that Respondent obtained her license through misrepresentation, as contemplated by N.C. Gen. Stat. § 58-33-46(a)(3).

8. 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."

9. The Kansas Denial of Respondent's reinstatement application for a nonresident insurance producer license is an administrative action, as contemplated by N.C. Gen. Stat. § 58-33-32(k). *See* Pet'r's Exs. 5 and 10.

10. Respondent failed to report the Kansas Denial as required by N.C. Gen. Stat. § 58-33-32(k).

11. N.C. Gen. Stat. § 58-2-69(c) requires licensees to report any criminal conviction, other than certain motor vehicle infractions, in writing to the Commissioner within 10 days after the date of the conviction.

12. After receiving her license on June 7, 2021, Respondent received misdemeanor convictions in the Mayor's Court of Parma Heights, Ohio, on March 3, 2022, on March 20, 2023, and two convictions on July 7, 2023. These convictions were reported through the NIPR attachment warehouse on October 10, 2024. This reporting date was beyond the 10-day requirement imposed by N.C. Gen. Stat. § 58-2-69(c). *See* Pet'r's Exs. 7 and 8.

13. The undersigned finds that Respondent was unresponsive to multiple pieces of correspondence from Petitioner regarding the allegations in this case. *See* Pet'r's Exs. 1, 11-15. N.C. Gen. Stat. § 58-2-195 gives ASD the authority to require producers to request reports, records, and information. With this authorization, the Commissioner requires that licensees provide information to ASD "on demand" pursuant to N.C. Gen. Stat. §§ 58-2-185 and 58-2-195.

14. By failing to respond to multiple requests for information and records from ASD, Respondent violated N.C. Gen. Stat. §§ 58-2-185 and 58-2-195.

15. N.C. Gen. Stat. § 58-33-46(a)(2) authorizes disciplinary action if a licensee violates "any insurance law of this or any other state."

16. Respondent violated N.C. Gen. Stat. §§ 58-2-69(c), 58-2-185, 58-2-195, and 58-33-32(k), which are North Carolina insurance laws within the meaning of N.C. Gen. Stat. § 58-33-46(a)(2).

17. N.C. Gen. Stat. § 58-33-46(a)(9) states that the Commissioner may place on probation, suspend, revoke, or refuse to renew any license if an insurance producer license is denied in another state for reasons substantially similar to those listed in N.C. Gen. Stat. § 58-33-46(a).

18. Substantial similarity is a standard lower than “identicalness” which requires the trier of law to compare the elements of the out of state law with the elements of the North Carolina law. *See State v. Sanders*, 367 N.C. 716, 766 S.E.2d 331 (2014).

19. On November 12, 2024, Kansas denied Respondent’s reinstatement application for a non-resident insurance producer license in part due to K.S.A. 40-4909(a)(1). This statute authorized Kansas to deny Respondent’s license for providing incorrect, misleading, incomplete, or untrue information in the license application.

20. K.S.A. 40-4909(a)(1) states that the state’s commissioner may deny, suspend, revoke or refuse renewal of any license issued under that act if the commissioner finds that the applicant or license holder has provided incorrect, misleading, incomplete or untrue information in the license application. Comparably, N.C. Gen. Stat. § 58-33-46(a)(1) states that the Commissioner may place on probation, suspend, revoke, or refuse to renew any license issued under this Article for providing materially incorrect, misleading, incomplete, or materially untrue information in the license application. The undersigned finds that these two statutes are substantially similar as they both authorize substantially similar administrative action for “incorrect, misleading, incomplete, or untrue information” on a license application.

21. The Kansas Denial cited Respondent’s violation of K.S.A. 40-4905(f)(1)(d) as one of the grounds for denial of Respondent’s license. This statute states that every licensed insurance agent in Kansas must report all details of any misdemeanor or felony other than minor traffic violations within thirty days of the crime. The North Carolina counterpart to this statute is N.C. Gen. Stat. § 58-2-69(c), which states that if a licensee is convicted of any crime other than a motor vehicle infraction, the licensee must notify the Commissioner in writing of the conviction within 10 days after the date of conviction.

22. K.S.A. 40-4905(f)(1)(d) and N.C. Gen. Stat. § 58-2-69(c) are substantially similar in that they both require reports to the respective state insurance officials of any criminal convictions, other than certain motor vehicle infractions, within a set time period. These statutes may not be identical, but that is not required to prove



substantial similarity under case law. *Sanders*, 367 N.C. 716, 766 S.E.2d 331. The commonalities in purpose and reporting requirements should be sufficient to meet the substantial similarity requirement under N.C. Gen. Stat. § 58-33-46(a)(9).

23. When citing the violation of K.S.A. 40-4905(f)(1)(d), Kansas noted that this constituted a violation of insurance law authorizing denial, suspension, renewal refusal, or revocation pursuant to K.S.A. 40-4909(a)(2)(A).

24. As previously relied upon in this Order, N.C. Gen. Stat. § 58-33-46(a)(2) authorizes the Commissioner to take administrative action against a license if the licensee is found to have violated any insurance law of this state. The undersigned finds that this statute is substantially similar to K.S.A. 40-4909(a)(2)(A), one of the cited grounds in the Kansas denial, as both statutes authorize administrative action against a licensee who violates the insurance laws of the state in question.

25. N.C. Gen. Stat. § 58-33-46(a)(1) and K.S.A. 40-4909(a)(1) are substantially similar, and the Kansas statute was the grounds for the Kansas Denial. Furthermore, N.C. Gen. Stat. § 58-2-69(c) and K.S.A. 40-4905(f)(1)(d) are also substantially similar to one another, and the Kansas statute was cited as a basis for the Kansas Denial as well. Finally, N.C. Gen. Stat. § 58-33-46(a)(2) and K.S.A. 40-4909(a)(2)(A) are substantially similar and the Kansas statute was cited as grounds for the Kansas Denial. These statutes are substantially similar, and therefore Respondent's North Carolina license may be placed on probation, suspended, or revoked pursuant to N.C. Gen. Stat. § 58-33-46(a)(9).

26. Based on the evidence received and the applicable law, the undersigned Hearing Officer concludes that Respondent's North Carolina nonresident insurance producer license should be revoked pursuant to N.C. Gen. Stat. § 58-33-46(a)(1) for misrepresenting her criminal history on her license application, pursuant to N.C. Gen. Stat. § 58-33-46(a)(2) for her violation of N.C. Gen. Stat. §§ 58-2-69(c), 58-2-185, 58-2-195, and 58-33-32(k), pursuant to N.C. Gen. Stat. § 58-33-46(a)(3) for obtaining her license through misrepresentation, and pursuant to N.C. Gen. Stat. § 58-33-46(a)(9) for having her license denied in Kansas for reasons substantially similar to those listed in N.C. Gen. Stat. § 58-33-46(a).

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


### **ORDER**

It is ORDERED that Respondent's insurance producer license issued by the North Carolina Department of Insurance is hereby **REVOKED** effective as of the date of the signing of this Order.

This Order becomes effective four (4) days after this Order has been placed in USPS mail to Respondent's residential address of record as evinced by a Certificate of Service pursuant to N.C. Gen. Stat. § 58-2-69(b), (d) and (e).

This Order constitutes an adverse administrative action against Respondent's North Carolina insurance producer license that will be reported by the North Carolina Department of Insurance through the National Association of Insurance Commissioners (NAIC). Respondent may be required to timely report this adverse administrative action to other states in which she holds insurance licenses. Respondent should consult with the insurance regulators for the states in which she holds insurance licenses about their specific reporting requirements for adverse administrative action.

This 2 day of June, 2025.

  
\_\_\_\_\_  
Terrence D. Friedman  
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 1.0413 and N.C.G.S. § 1A-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 and requires service of the Petition on all parties. 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 Respondent at the address the licensee provided to the Commissioner pursuant to N.C. Gen. Stat. § 58-2-69(b), (d) and (e), and via State Courier to Attorney for Petitioner addressed as follows:

CHRISTA MARIE WALDROP  
6389 STUMPH RD.  
PARMA HEIGHTS, OH 44130-2926  
*(Respondent)*

**Certified Mail Tracking Number: 9589 0710 5270 0742 5905 83**

Nicholas B. Sorensen  
Assistant Attorney General  
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*(Attorney for Petitioner)*

This the 18<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  
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