

MAR 16 2021

BEFORE THE DEPARTMENT OF INSURANCE
STATE OF NEBRASKA

FILED

STATE OF NEBRASKA)	
DEPARTMENT OF INSURANCE,)	CONSENT ORDER
)	
PETITIONER,)	
)	
VS.)	
)	
Paul Stover)	CAUSE NO. A-2239
(NAIC Producer #19448982),)	
RESPONDENT.)	
)	

In order to resolve this matter, the Nebraska Department of Insurance ("Petitioner"), by and through its attorney, Michael W. Anderson, and Paul Stover ("Respondent"), by and through his attorney, Justin B. Kalemkarian, mutually stipulate and agree as follows:

JURISDICTION

1. Petitioner has jurisdiction over the subject matter and Respondent pursuant to Neb. Rev. Stat. §§ 44.101.01, and 44-4047 to 44-4067.
2. Respondent has been licensed as a resident insurance producer under the laws of Nebraska at all times material hereto.

STIPULATIONS OF FACT

1. Petitioner initiated this administrative proceeding by filing a Petition captioned State of Nebraska Department of Insurance vs. Paul Stover (NAIC National Producer

MEMORANDUM FOR THE DIRECTOR, FBI (100-442611) FROM SAC, NEW YORK (100-100000) (P)

RE: [Illegible]

COMMUNIST PARTY

INTERNAL SECURITY - C

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#19448982), Cause Number A-2239 on November 17, 2020. A copy of the Petition was sent to the Respondent at his registered address by certified mail, return receipt requested, and by regular U.S. mail. Respondent acknowledges receiving proper Notice of these proceedings.

2. Respondent is alleged to have violated Neb. Rev. Stat. §§ 44-4059(1) (g), 44-4059(1) (h), 44-1524 (1), and 44-1525 (2) as follows:

- a. On June 22, 2020, Petitioner's office received a complaint concerning the Respondent, in which it was reported that Respondent made use of a lead card that complainant found to be misleading.
- b. This lead card, received by the complainant, stated that "As a resident of Nebraska, you are entitled to more benefits not provided by government funds. You now have access to a 2020 state-regulated program which will pay 100% of all final expenses up to \$35,000."
- c. On June 26, 2020, Respondent provided a response to the complaint to Petitioner's office, in which he stated that, even while using the lead card, he was "not soliciting any specific policy."
- d. The use of the lead card in this case could be, and in this case was, misleading, as it seemed to reference a specific plan, rather than a general solicitation of business.

3. Respondent admits the allegations in Paragraph 2

4. Respondent was informed of his right to a public hearing. Respondent waives that right and enters into this Consent Order freely and voluntarily. Respondent understands and acknowledges that by waiving his right to a public hearing, Respondent also waives his right to confrontation of witnesses, production of evidence, and judicial review.

CONCLUSIONS OF LAW

Respondent's conduct as alleged above constitutes violations of Neb. Rev. Stat. §§ 44-4059(1) (g), 44-4059(1) (h), 44-1524 (1), and 44-1525 (2), and Respondent is subject to disciplinary action pursuant to Neb. Rev. Stat. §44-4059.

CONSENT ORDER

It is therefore Ordered by the Director of Insurance and agreed by Respondent that:

1. Respondent agrees to pay an administrative penalty of \$500.
2. The Nebraska Department of Insurance shall retain jurisdiction of this matter for the purpose of enabling Respondent or the Department of Insurance to make application for such further orders as may be necessary should Respondent fail to pay the aforementioned penalty.

In witness of their intention to be bound by this Consent Order, each party has executed this document by subscribing their signatures below.



Michael W. Anderson, #25671



Paul Stover

Attorney for Petitioner
1135 M Street, Suite 300
Lincoln NE 68501
(402) 471-2201

Respondent

3-10-2021

Date

3/3/21

Date

State of NEBRASKA)

) ss.

County of LANCASTER)

On this 3 day of March, 2021, Paul Stover personally appeared before me and read this Consent Order, executed the same, and acknowledged the same to be his voluntary act and deed.



Diane Osterloo
Notary Public

CERTIFICATE OF ADOPTION

I hereby certify that the foregoing Consent Order is adopted as the Final Order of the Nebraska Department of Insurance in the matter of State of Nebraska Department of Insurance vs. Paul Stover (NAIC National Producer #19448982), Cause No. A-2239.

INSURANCE

STATE OF NEBRASKA
DEPARTMENT OF

Bruce R. Ramge

Bruce R. Ramge
Director of Insurance

GENERAL NOTARY - State of Nebraska
DIANE OSTERLO
My Comm. Exp. February 12, 2024

3-16-2021

Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consent Order was served upon Respondent by mailing a copy to his mailing address at 3201 Ruhlman Circle, Martell, NE 68404, by certified mail, return receipt requested, by regular U.S. mail, on this 16th day of March, 2021.

Shay Storie