



**STATE OF TENNESSEE
BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE**

TENNESSEE INSURANCE DIVISION)	
Petitioner,)	
)	
v.)	Matter No. 24-01202
)	
CHRISTIAN JEROME)	
Respondent.)	

ORDER OF SUMMARY SUSPENSION

This Order issues as the result of a Petition for Order of Summary Suspension requested by the Insurance Division of the Tennessee Department of Commerce and Insurance (“Division”) against Christian Jerome (“Respondent”). This Order is predicated upon the following Findings of Fact and Conclusions of Law:

FINDINGS OF FACT

1. The Respondent was assigned National Insurance Producer Number 17927326 by the National Insurance Producer Registry (“NIPR”), a service of the National Association of Insurance Commissioners (“NAIC”).
2. The Respondent is a licensee of the Division holding Tennessee nonresident Insurance Producer License Number 2342937, which was originally granted on or about May 31, 2020, and is responsible for being compliant with the Law and regulations of the State of Tennessee.

3. Beginning on or about December 21, 2023, the Financial Services Investigation Unit (“FSIU”) of the Division began receiving multiple complaints regarding the Respondent.

4. Kaye Steele (“Steele”) submitted a complaint on behalf of Lisa A. Giles (“Giles”), who is disabled and non-verbal. Steele stated that the Respondent opened an Ambetter of Tennessee (“Ambetter”) policy in Giles’s name without Giles’s knowledge or consent, since Giles could not have communicated to give consent.

5. Cayci Curtis (“Curtis”) submitted a complaint alleging that the Respondent cancelled her Blue Cross Blue Shield (“BCBS”) policy and opened an Ambetter policy without her knowledge or consent.

6. Christian Bankes (“Bankes”) submitted a complaint on behalf of Heather Haroon (“Haroon”). Bankes stated that the Respondent switched Haroon from an Ambetter policy to an Oscar Insurance plan without Haroon’s knowledge or consent.

7. Lisa A. Mitchell (“Mitchell”) submitted a complaint alleging that the Respondent enrolled Mitchell in a BCBS and an Ambetter policy on separate occasions without Mitchell’s knowledge or consent.

8. Leslie Silva (“Silva”) submitted a complaint on behalf of Angela Lawrence (“Lawrence”). Silva stated that the Respondent submitted applications for insurance for Lawrence on two (2) occasions without Lawrence’s knowledge or consent.

9. Patrick McGinn (“McGinn”) submitted a complaint on behalf of himself and his wife, Suellen McGinn. McGinn stated that the Respondent cancelled their BCBS policy and changed their insurance to an Ambetter policy without their knowledge or consent, causing a lapse in medical coverage during and after a surgery.

10. Kristy Montgomery (“Montgomery”) submitted a complaint alleging that the Respondent accessed her marketplace account and changed her insurance policy to an Ambetter plan without her knowledge or consent, causing lapses in coverage as the new policy did not include her current doctors in its network.

11. Mary Russell is the legal guardian of Joshua Russell and submitted a complaint on behalf of Joshua Russell. Mary Russell stated that the Respondent submitted fraudulent applications through the marketplace without their knowledge or consent. Mary Russell stated that there was no need for an insurance policy as both were covered under a private policy.

12. Jennifer Tomlin (“Tomlin”) submitted a complaint alleging that the Respondent changed her plan from Ambetter to Cigna without her knowledge or consent, causing an increase in prescription costs as well as missed medical treatments due to lack of coverage and increased out-of-pocket costs associated with treatment.

13. Joshua Barnes (“Barnes”) submitted a complaint alleging that the Respondent changed his policy from Cigna to Ambetter without Barnes’s knowledge or consent eleven (11) days prior to a major surgery. Barnes explained that this change caused substantial financial loss.

14. Andrea Scholes (“Scholes”) submitted a complaint alleging that the Respondent changed her insurance policy from a TennCare Medicaid policy to an Ambetter policy that was outside her network of healthcare providers without her knowledge or consent.

15. As a result of the complaints, the Division entered Inquisitorial Order #24-007 on February 20, 2024, initiating an investigation into the Respondent.

16. On February 5, 2025, Becky Delaney (“Delaney”) submitted a complaint alleging that the Respondent submitted a health insurance policy with Ambetter without her knowledge or consent.

17. FSIU Investigator Pyrdom reviewed the policy documents for each of the complainants listed above and found that the Respondent was the agent of record responsible for each of the policy applications or alterations referenced in the complaints.

CONCLUSIONS OF LAW

18. At all times relevant hereto, Tenn. Code Ann. § 4-5-320(c) has provided:

...

If the agency finds that public health, safety, or welfare imperatively requires emergency action, and incorporates a finding to that effect in its order, summary action, including suspension of a license or other licensure restriction or action as may be appropriate to protect the public, may be ordered pending proceedings for revocation or other action. These proceedings shall be promptly instituted and determined.

19. At all times relevant hereto, Tenn. Code Ann. § 56-6-112(a) has provided:

(a) The commissioner may place on probation, suspend, revoke, or refuse to issue or renew a license issued under Title 56, Part 6, Chapter 1, or issue a civil penalty for any one (1) or more of the following reasons:

...

(8) Using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere;

...

(10) Forging another's name to an application for insurance or to any document related to an insurance transaction;

20. For all violations occurring on or after July 1, 2011, Tenn. Code Ann. § 56-6-112 states:

...

(e) The commissioner shall retain the authority to enforce this part and impose any penalty or remedy authorized by this part and this title against any person who is under investigation for or charged with a violation of this part

or this title, even if the person's license has been surrendered or has lapsed by operation of law.

...

- (g) If [...] the commissioner finds that any person required to be licensed, permitted, or authorized by the division of insurance pursuant to this chapter has violated any statute, rule or order, the commissioner may, at the commissioner's discretion, order:
 - (1) The person to cease and desist from engaging in the act or practice giving rise to the violation;
 - (2) Payment of a monetary penalty of not more than one thousand dollars (\$1,000) for each violation, but not to exceed an aggregate penalty of one hundred thousand dollars (\$100,000). This subdivision (g)(2) shall not apply where a statute or rule specifically provides for other civil penalties for the violation. For purposes of this subdivision (g)(2), each day of continued violation shall constitute a separate violation; and
 - (3) The suspension or revocation of the person's license.
- (h) In determining the amount of penalty to assess under this section, the commissioner shall consider:
 - (1) Whether the person could reasonably have interpreted such person's actions to be in compliance with the obligations required by a statute, rule or order;
 - (2) Whether the amount imposed will be a substantial economic deterrent to the violator;
 - (3) The circumstances leading to the violation;
 - (4) The severity of the violation and the risk of harm to the public;
 - (5) The economic benefits gained by the violator as a result of noncompliance;
 - (6) The interest of the public; and
 - (7) The person's efforts to cure the violation.

Respondent Engaged in Fraudulent, Coercive or Dishonest Practices by submitting an insurance policy application without the client's knowledge or consent

21. The facts above are restated and incorporate by reference herein.

22. By submitting applications for insurance on behalf of multiple clients without permission or consent, Respondent engaged in fraudulent and dishonest practices within the meaning of Tenn. Code Ann. § 56-6-112(a)(8).

23. The fraudulent and dishonest actions of Respondent are sufficient grounds under Tenn. Code Ann. § 4-5-320(c) for the entry of an Order Summarily Suspending the Respondent's insurance producer license.

24. The Respondent's willingness to submit fraudulent policies creates an emergent concern to the public health, safety, and welfare of citizens. Further, such action shows a complete lack of respect for the authority of the Commissioner or the State's insurance laws. Willful violations of laws and rules protecting consumers creates an imperative risk of harm to potential clients who would rely on the Respondent to work on their behalf in the insurance business.

25. The fraudulent and dishonest actions of the Respondent are sufficient grounds under Tenn. Code Ann. § 4-5-320(c) for the entry of an Order Summarily Suspending the Respondent's insurance producer license.

Respondent Engaged in Forgery

26. The facts above are restated and incorporate by reference herein.

27. By signing the insurance applications of clients without the clients' knowledge or consent, the Respondent engaged in Forgery in violation of Tenn. Code Ann. § 56-6-112(a)(10).

28. The Respondent's fraudulent actions demonstrate a willingness to put his pecuniary gain ahead of the desires or best interests of Tennessee citizens. The Respondent's acts of forgery

create an emergent concern to the public health, safety, and welfare of citizens because the Respondent has demonstrated untruthfulness and caused interruption of health insurance coverage and financial harm to consumers. These actions further show a lack of appreciation and respect for the insurance laws and regulations of the State of Tennessee and undermines the Tennessee Insurance Division's efforts to protect consumers.

29. The acts of forgery by the Respondent are sufficient grounds under Tenn. Code Ann. § 4-5-320(c) for the entry of an Order Summarily Suspending the Respondent's insurance producer license.

30. Based on the above Findings of Fact, continuation of the Respondent's nonresident insurance producer license would be hazardous to the public due to evidence showing the Respondent's fraudulent actions. Therefore, the public health, safety, and welfare necessitate summary relief in this case.

ORDER

NOW, THEREFORE, in consideration of the foregoing, it is **ORDERED** that:

31. The Respondent **SHALL COMPLY** with the provisions of the Law and all rules promulgated thereunder.

32. The Respondent's license with the Division as an insurance producer, license number 2342937, is hereby **SUMMARILY SUSPENDED** until final determination of whether the Respondent's registration should be revoked pursuant to Tenn. Code Ann. §§ 4-5-320(c) and 56-6-112.

33. Any person aiding or abetting the Respondent engaging in any unlawful activities shall immediately **CEASE and DESIST** from such activity.

34. This Order of Summary Suspension is not intended to prohibit any lawful conduct in which the Respondent might be engaged.

35. Entry of this Order of Summary Suspension shall not in any way restrict the Division or the Commissioner from taking further action against the Respondent with respect to these or other possible violations of the Act, or possible violations of any of the Rules promulgated thereunder.

36. Pursuant to Tenn. Code Ann. § 4-5-320(d)(1)(B), the Respondent is advised that he has the right to an informal hearing before the agency within seven (7) business days of the issuance of this Order of Summary Suspension. The sole issue to be considered is whether the public health, safety, or welfare imperatively required emergency action by the agency. If you wish to exercise your right to this informal hearing, please notify:

SCOTT MCANALLY
ASSISTANT COMMISSIONER FOR INSURANCE
STATE OF TENNESSEE DEPARTMENT OF COMMERCE AND INSURANCE
DAVY CROCKETT TOWER
500 JAMES ROBERTSON PARKWAY
NASHVILLE, TENNESSEE 37243


37. Such a request for an informal hearing must be in writing and received within seven (7) business days from the date of entry of this Order of Summary Suspension.

ENTERED this 02 day of December, 2025.


Carter Lawrence (Dec 2, 2025 15:51:15 CST)

Carter Lawrence, Commissioner

APPROVED FOR ENTRY:


Scott McAnally (Nov 26, 2025 14:25:32 CST)

Scott McAnally
Assistant Commissioner for Insurance
Department of Commerce and Insurance

ISSUANCE REQUESTED BY:

Alex G. Corder

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