

BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE STATE OF TENNESSEE

TENNESSEE INSURANCE DIVISION Petitioner,)	
V.)) M A	ATTER No. 21-00858
CLAUDE D. JENNINGS JR.)	
Respondent.)	
CONSENT ORDER		

The Insurance Division of the Tennessee Department of Commerce and Insurance ("Division") and Claude D. Jennings JR. ("Respondent") hereby stipulate and agree to the entry and execution of this Consent Order, subject to the approval of the Commissioner of the Tennessee Department of Commerce and Insurance ("Commissioner") as follows:

GENERAL STIPULATIONS

- 1. It is expressly understood that this Consent Order is subject to the Commissioner's acceptance and has no force and effect until such acceptance is evidenced by the entry and execution of an order by the Commissioner.
- 2. This Consent Order is executed by the parties for the purpose of avoiding further administrative action with respect to this cause. Furthermore, should this Consent Order not be accepted by the Commissioner, it is agreed that presentation to and consideration of this Consent Order by the Commissioner shall not unfairly or illegally prejudice the Commissioner from further participation or resolution of these proceedings.

3. The Respondent fully understands that this Consent Order will in no way preclude

additional proceedings by the Commissioner against the Respondent for acts or omissions not

specifically addressed in this Consent Order or for facts and/or omissions that do not arise from

the facts or transactions herein addressed.

4.

The Respondent fully understands that this Consent Order will in no way preclude

proceedings by state government representatives, other than the Commissioner, for alleged

violations of the law addressed specifically in this Consent Order, violations of law under statutes,

rules, or regulations of the State of Tennessee, which may arise out of the facts, acts, or omissions

contained in the Findings of Fact and Conclusions of Law stated herein, or which may arise as a

result of the entry and execution of this Consent Order by the Respondent.

5. The Respondent expressly waives all further procedural steps, and expressly

waives all rights to seek judicial review of or to otherwise challenge or contest the validity of this

Consent Order, the stipulations and imposition of discipline contained herein, and the

consideration and entry and execution of said Consent Order by the Commissioner.

AUTHORITY AND JURISDICTION

6. The Commissioner has jurisdiction of this action pursuant to the Tennessee

insurance law, Title 56 of the Tennessee Code Annotated ("Tenn. Code Ann."), specifically

Tenn. Code Ann. §§ 56-1-103 and 56-6-112 (the "Law"). The Division is the lawful agent through

which the Commissioner discharges this responsibility.

PARTIES

7. The Commissioner administers the Law through the Division and authorizes the

Division to bring this action for the protection of the public.

In the Matter of Claude Jennings Consent Order 8. The Respondent is a licensee of the Division holding Tennessee Resident Insurance Producer License Number 2005253, which was originally granted on or about September 27, 2018, and is responsible for being compliant with the Law and regulations of the State of Tennessee.

9. The Respondent was assigned National Insurance Producer Number 15717611 by the National Insurance Producer Registry ("NIPR"), a service of the National Association of Insurance Commissioners ("NAIC").

FINDINGS OF FACT

10. From at least January of 2019 until about February of 2022, Respondent worked as an insurance producer for a Tennessee insurance business owned by Johnny Jackson, which operated under various names including Senior Health and Wealth Management LLC, Senior Health and Wealth Marketing LLC, and All Things Advisory Group PLLC.

11. The Respondent's employer, Johnny Jackson, is a former Tennessee insurance producer whose license was permanently revoked by the Division in 1999.

12. Respondent admits that on more than one occasion during his employment with Johnny Jackson he signed applications for insurance as the selling agent, or allowed his insurance license number to be used, when the policies were, in fact, sold by another insurance producer and/or unlicensed person, including Mr. Jackson.

CONCLUSIONS OF LAW

- 13. At all times relevant hereto, Tenn. Code Ann. § 56-6-112 has provided that:
 - (a) The [C]ommissioner may place on probation, suspend, revoke, or refuse to issue or renew a license issued under [T]itle 56, [P]art 6, [C]hapter 1, or issue a civil penalty for any one (1) or more of the following causes:

(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[.]

(e) The [C]ommissioner 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.

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- (g) If . . . the [C]ommissioner 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 [C]ommissioner may, at the [C]ommissioner'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 [C]ommissioner 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.

ORDER

NOW, THEREFORE, on the basis of the foregoing, and the Respondent's waiver of the right to a hearing and appeal under the Law and the Uniform Administrative Procedures Act, Tenn. Code Ann. §§ 4-5-101 *et seq.*, and the Respondent's admission of jurisdiction of the Commissioner, the Commissioner finds that the Respondent, for the purpose of settling this matter, admits the Findings of Fact and agrees to the entry and execution of this Order.

IT IS ORDERED, pursuant to Tenn. Code Ann. § 56-6-112 of the Law, that:

- 14. The Respondent submit to **VOLUNTARY REVOCATION** of his Tennessee insurance producer license.
- 15. The respondent shall be **BARRED** from applying for an insurance producer license in Tennessee and be barred from engaging in the business of insurance in Tennessee.
- 16. The Respondent shall **CEASE AND DESIST** from activities requiring a license under Tenn. Code Ann. § 56-6-103.
- 17. This Consent Order represents the complete and final resolution of, and discharge with respect to all administrative and civil, claims, demands, actions and causes of action by the Commissioner against the Respondent for violations of the Law alleged by or currently known by the Division to have occurred with respect to the transactions involving the above referenced facts contained herein.
 - 18. This Consent Order is in the public interest and in the best interests of the parties

and represents a compromise and settlement of the controversy between the parties and is for

settlement purposes only.

By the signatures affixed below, the Respondent affirmatively states he has freely 19.

agreed to the entry and execution of this Consent Order, that the Respondent waives the right to

a hearing on the matters underlying this Consent Order or the enforcement of this Consent Order,

and to a review of the Findings of Fact and Conclusions of Law contained herein, and that no

threats or promises of any kind have been made to him by the Commissioner, the Division, or

any agent or representative thereof.

The parties, by signing this Consent Order, affirmatively state their agreement to 20.

be bound by the terms of this Consent Order and aver that no promises or offers relating to the

circumstances described herein, other than the terms of settlement as set forth in this Consent

Order, are binding upon them.

This Consent Order may be executed in two (2) or more counterparts, each of 21.

which shall be deemed an original but all of which together shall constitute one and the same

document. The facsimile, email, or other electronically delivered signatures of the parties shall

be deemed to constitute original signatures, and facsimile or electronic copies shall be deemed to

constitute duplicate originals.

ENTERED AND EXECUTED August 20, 2025.

Carter Lawrence, Commissioner

Department of Commerce and Insurance

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APPROVED FOR ENTRY:



Claude D. Jennings Jr.

Respondent

<u>work to the form the</u>

Bill Huddleston
Assistant Commissioner for Insurance
Department of Commerce and Insurance

Smul J Moore

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