



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

TENNESSEE INSURANCE DIVISION,)	
)	
Petitioner,)	
)	
v.)	TID No.: 26-20
)	
AMANDA K. MILLER,)	
)	
)	
Respondent.)	

CONSENT ORDER

The Insurance Division of the Tennessee Department of Commerce and Insurance (“Division”) and Amanda K. Miller (“Respondent”), hereby stipulate and agree to the entry and execution of this Consent Order (“Order”) in accordance with Title 56 of the Tennessee Code Annotated (“Tenn. Code Ann.” or “the Law”), subject to the approval of the Commissioner of the Tennessee Department of Commerce and Insurance (“Commissioner”).

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 the Commissioner.

2. It is expressly understood that this Consent Order is in the public interest, necessary for the protection of consumers, and consistent with the purposes fairly intended by Title 56 of the Tennessee Code Annotated.

3. This Consent Order is executed by the Commissioner, the Division, and the Respondent to avoid further administrative action with respect to this cause. 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.

4. The Respondent fully understands that this Consent Order will in no way preclude additional proceedings by the Commissioner against the Respondent for acts and/or omissions not specifically addressed in this Consent Order nor for facts and/or omissions that do not arise from the facts or transactions herein.

5. The Respondent fully understands that this Consent Order will in no way preclude proceedings by state government representatives, other than the Commissioner, for acts or omissions addressed specifically in this Consent Order, violations of law under statutes, rules, or regulations of the State of Tennessee that arise out of the facts, acts, or omissions contained in this Consent Order, or acts or omissions addressed specifically herein that result from the execution of this Consent Order.

6. The Respondent waives all further procedural steps and waives all rights to seek judicial review of, or otherwise challenge the validity of this Consent Order, the stipulations and imposition of discipline contained herein, or the consideration and entry and execution of this Consent Order by the Commissioner.

7. This Consent Order is submitted on the condition that, if accepted, the Commissioner will not bring any future actions against the Respondent alleging violations based on the same factual findings described herein.

PARTIES

8. The Commissioner administers the Law through the Division and authorizes the Division to bring this action for the protection of the public.

9. Amanda K. Miller (“Respondent”) is a licensee of the Division and holds Tennessee resident insurance producer license number 2373629, effective September 8, 2017.

10. The Respondent was also assigned National Insurance Producer Number 18503529 by the National Insurance Producer Registry (“NIPR”), a service of the National Association of Insurance Commissioners (“NAIC”).

FINDINGS OF FACT

11. The Respondent was appointed in 2017 to sell accident, life, and health insurance products on behalf of Freedom Life Insurance Company of America (“Freedom Life”) and on behalf of USHEALTH Advisors, LLC, an insurance agency affiliated with Freedom Life.

12. On or about November 4, 2020, the Office of Superintendent of Insurance for the state of New Mexico (“New Mexico OSI”) received a complaint against the Respondent. Upon investigation, it was discovered that Respondent falsely indicated that applicants were Texas residents on at least two (2) insurance applications.

13. Freedom Life terminated the Respondent’s appointment on February 4, 2021, for selling insurance policies in New Mexico when the Respondent was not properly licensed and when Freedom Life insurance products were not approved for sale in New Mexico.

14. On or about April 13, 2023, the New Mexico OSI issued a Notice to Show Cause why the Respondent’s New Mexico nonresident insurance producer license should not be revoked and ordered her to provide evidence that she had not violated New Mexico’s insurance laws. The

New Mexico OSI ordered the Respondent to respond within thirty (30) days from the date of the Notice to Show Cause.

15. The New Mexico OSI revoked the Respondent's nonresident insurance producer license, effective June 1, 2023, based on the following:

- (a) Failing to inform the Superintendent of a change of her address within thirty (30) days of the change;
- (b) Providing incorrect, misleading, or materially untrue information in her license application by failing to disclose her termination for cause by USHEALTH Advisors, LLC;
- (c) Selling, soliciting, and negotiating an unapproved insurance product in New Mexico at a time when she was unlicensed;
- (d) Making a material misrepresentation on her insurance producer application by intentionally and recklessly failing to disclose that she had been terminated for cause by USHEALTH Advisors, LLC;
- (e) Intentionally submitting insurance applications containing fraudulent addresses;
- (f) Demonstrating incompetence and untrustworthiness in the conduct of business; and
- (g) Determination that the interests of the insureds or the public are not being properly served under the license.

16. The Louisiana Department of Insurance revoked the Respondent's Louisiana nonresident insurance producer's license, effective January 26, 2024, because her insurance producer license was revoked in another jurisdiction.

17. The Department of Insurance for the state of North Carolina revoked the Respondent's North Carolina nonresident insurance producer's license effective April 4, 2024. The basis for the revocation includes the following:

- (a) Failure to report to the Commissioner an administrative action taken against the producer in another state or by another governmental agency within thirty (30) days after the final disposition of the matter;
- (b) Violation of an insurance law of the state or other state's laws and violation of an administrative rule, subpoena, or order of the Commissioner or of another state's insurance regulator;
- (c) Having an insurance producer license, or its equivalent, denied, suspended, or revoked in another jurisdiction.

18. The Department of Labor and Regulation, Division of Insurance for the state of South Dakota, revoked the Respondent's South Dakota nonresident insurance producer's license effective June 10, 2024, based on the following:

- (a) Having an insurance producer licensed revoked in another state;
- (b) Failing to timely report an administrative action to the Division; and,
- (c) Failing to timely respond to the Division.

CONCLUSIONS OF LAW

19. At all times relevant hereto, Tenn. Code Ann. § 56-6-112 provides:

- (a) The [C]ommissioner may place on probation, suspend, revoke or refuse to issue or renew a license issued under this part or may levy a civil penalty in accordance with this section or take any combination of those actions, for any one (1) or more of the following causes:
...
 - (9) Having an insurance producer license, or its equivalent, denied, suspended or revoked in any other state, province, district or territory;

20. The Findings of Fact detailed above show that Respondent's insurance producer license was revoked in multiple jurisdictions in violation of Tenn. Code Ann. § 56-6-112(a)(9).

21. The Commissioner finds the following relief appropriate, in the public interest, and necessary for the protection of consumers.

ORDER

NOW, THEREFORE, based on the foregoing, including the Respondent's waiver of the right to a hearing and appeal under the Law and the Tennessee Uniform Administrative Procedures Act, Tenn. Code Ann. §§ 4-5-101 *et seq.*, and the Respondent's admission to the jurisdiction of the Commissioner, the Commissioner finds that the Respondent agrees to the entry and execution of this Consent Order to settle this matter as evidenced by the Respondent's signature.

IT IS ORDERED that:

22. The Respondent shall **COMPLY** with the Law, as amended, and all rules promulgated thereunder; and

23. The Respondent shall **PAY A CIVIL PENALTY** to the State of Tennessee in the amount of four thousand dollars (\$4,000), pursuant to the following payment terms:

The payment of such civil penalty shall be made by check payable to the Tennessee Department of Commerce and Insurance within thirty (30) days of the execution of this Order by the Commissioner. Page one (1) of this Consent Order must accompany the payment for reference. Payment shall be mailed to the attention of:

**State of Tennessee
Department of Commerce and Insurance
Attn: Jenny Taylor
500 James Robertson Parkway
Davy Crockett Tower
Nashville, Tennessee 37243**

24. **GRACE PERIOD** – Payment shall be timely made if postmarked within five (5) business days of the date payment is due.

25. **ACCELERATION** – Respondent hereby agrees that failure to remit any payment more than sixty (60) calendar days following the due date of said payment as indicated in the above scheduled payments shall constitute default. Upon default, the entire outstanding civil penalty shall be due and payable immediately.

26. **DELINQUENCY** – Respondent hereby agrees that failure to make any payment according to this Consent Order shall result in the immediate revocation of Respondent’s licensure with the Division.

27. **MODIFICATION** – The Division and Respondent hereby agree that modifications to this Consent Order regarding any term may only be made in writing and signed by an authorized representative of each party.

28. The Respondent’s failure to comply with the terms of this Consent Order, including the manner and method of payment of the civil penalty described above, shall result in further administrative disciplinary actions, which may include the assessment of additional civil penalties.

29. This Consent Order represents the complete and final resolution of and discharge of all administrative and civil claims, demands, actions, and causes of action by the Commissioner against the Respondent for violations of the Law with respect to the transactions involved in above-referenced facts. However, excluded from and not covered by this paragraph, are any claims by the Division arising from or relating to the enforcement of the Consent Order provisions contained herein.

30. This Consent Order is in the public interest and the best interests of the Parties. It represents a settlement of the controversy between the Parties and is for settlement purposes only.

31. By the signatures affixed below, or in two (2) or more counterparts, the Respondent affirmatively states the following: the Respondent freely agrees to the entry and execution of the Consent Order; the Respondent waives the right to a hearing on, or a review of, the matters, the Findings of Fact, and the Conclusions of Law underlying this Consent Order or the enforcement of this Consent Order; and the Respondent encountered no threats or promises of any kind by the Commissioner, the Division, or any agent or representative thereof.

32. By signing this Consent Order, the Commissioner, the Division, and the Respondent affirmatively state their agreement to 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.

33. This Consent Order may be executed in two (2) or more counterparts, each of 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 other electronic copies shall be deemed to constitute duplicate originals.

ENTERED AND EXECUTED May 22, 2026.




Carter Lawrence (May 22, 2026 15:33:32 CDT)

Carter Lawrence, Commissioner
Department of Commerce and Insurance

APPROVED FOR ENTRY AND EXECUTION:




Amanda K. Miller



Scott McAnally (May 18, 2026 21:41:34 EDT)

Scott McAnally
Assistant Commissioner for Insurance
Department of Commerce and Insurance



Jenny Taylor (May 15, 2026 16:16:45 CDT)

Jenny Taylor, BPR #027264
Associate General Counsel for Insurance
Department of Commerce and Insurance