

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED March 16, 2023 by AS

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STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

KLINE, ANNA

(National Producer No. 20235299)

Respondent

No. 22A-072-INS

DEFAULT ORDER

On February 2, 2023, the Arizona Department of Insurance and Financial Institutions (the "Department") issued a Notice of Hearing ("Notice") in the above-captioned matter, a copy of which is attached as **Exhibit A** and incorporated by this reference. The Notice required Anna Kline ("Respondent") to provide a written answer to the allegations set forth in the Notice within twenty days of the issuance of the Notice. As of this date, Respondent has failed to file an answer. On February 27, 2023, counsel for the Department filed a Motion for Default, a copy of which is attached as **Exhibit B**. As of this date, Respondent has not responded to the Department's motion. Pursuant to A.A.C. R20-6-106(D), a party that fails to file an answer within the time provided shall be deemed to be in default and one or more of the allegations in the Notice of Hearing may be deemed to be admitted.

FINDINGS OF FACT

1. Notice was proper.
2. Respondent is in default.
3. The allegations in the Notice are deemed admitted.

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CONCLUSIONS OF LAW

1. The conduct alleged in the Notice constitutes grounds for the Director to suspend, revoke or refuse to renew Respondent’s license to transact insurance in Arizona, pursuant to A.R.S. §20-295(A).

ORDER

IT IS ORDERED:

1. Anna Kline’s Arizona insurance producer license, National Producer No. 20235299, is revoked effective upon the issuance of this Order.
2. The hearing set for **March 24, 2023 at 1:00 p.m.** shall be vacated.

DATED and EFFECTIVE this 16th day of March, 2023.

Barbara Richardson

Barbara D. Richardson, Director
Arizona Department of Insurance and Financial Institutions

1 **COPY** of the foregoing electronically filed
this 17th day of March, 2023:

2 Adam Stone, Administrative Law Judge
3 <https://portal.azoah.com/submission>
4 Office of Administrative Hearings

5 **COPY** of the foregoing emailed same date to:

6 Gio Espinosa, Regulatory Legal Affairs Officer
7 Deian Ousounov, Assistant Director
8 Ana Starcevic, Paralegal Project Specialist
9 Wendy Greenwood, Investigations Supervisor
10 Steven Fromholtz, Division Manager, Licensing
11 Arizona Department of Insurance and Financial Institutions

12 James Rolstead, Assistant Attorney General
13 AdminLaw@azag.gov
14 Attorney for the Arizona Department of Insurance and Financial Institutions

15 **COPY** mailed by U.S. First Class and
16 Certified Mail, Return Receipt Requested, and emailed same date to:

17 Anna Kline
18 5249 N. Park Pl. NE
19 Cedar Rapids, IA 52407
20 Respondent 9489 0090 0027 6486 6716 86

21 Anna Kline
22 4704 Stonebridge Rd.
23 West Des Moines, IA 50265
24 Respondent 9489 0090 0027 6486 6716 79

Anna Kline
25 anna@redcardinalinsurance.com
26 sales@redcardinalinsurance.com
27 Respondent

28 *Ana Starcevic*
29 _____
30 1105516

Exhibit A

**STATE OF ARIZONA
DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS**

In the Matter of:

Docket No. 22A-072-INS

KLINE, ANNA
(National Producer No. 20235299)

**NOTICE OF HEARING AND
COMPLAINT**

Respondent

(ALJ Adam Stone)

DIRECTED TO:

Anna Kline
5249 N. Park PL NE
Cedar Rapids, IA 52402
Respondent

YOU ARE HEREBY NOTIFIED that under Arizona Revised Statutes (“A.R.S.”) §§ 20-161 and 41-1092.01, the above-captioned matter will be conducted through the Office of Administrative Hearings, an independent agency.

**Date of Hearing:
March 24, 2023 at 1:00 p.m.**

**Location:
Office of Administrative Hearings
1740 W. Adams St.
Lower Level
Phoenix, AZ 85007**

Information regarding procedures, practice pointers, or the online filing of motions is available through the Office of Administrative Hearings’ website at www.azoah.com, or by calling their offices at (602) 542-9826.

1 The Office of Administrative Hearings has designated Adam Stone at the address and
2 phone number listed above, as the Administrative Law Judge for these proceedings.

3 Under the Americans with Disabilities Act (ADA), the Office of Administrative Hearings
4 endeavors to ensure the accessibility of its hearings to all persons with disabilities. Persons with
5 disabilities may request reasonable accommodations such as interpreters, alternative formats, or
6 assistance with physical accessibility. Requests for accommodations should be made as far in
7 advance of the Hearing as possible to allow time to arrange the accommodations. If you require
8 accommodations, please contact the Office of Administrative Hearings by calling their offices at
9 (602) 542-9826.

10 Under Arizona Administrative Code (“A.A.C.”) R2-19-106 and R2-19-110, motions to
11 continue this matter shall be made in writing to the Administrative Law Judge at least fifteen (15)
12 days before the Hearing date, unless good cause is demonstrated. A copy of any motion to
13 continue shall be filed and served according to A.A.C. R2-19-108, with a copy provided to the
14 Assistant Attorney General identified below.

15 You may appear on the date and at the time and place specified in this Notice of Hearing
16 (“Notice”) with or without the assistance of counsel. An insurance company may be represented
17 by a corporate officer A.R.S. § 20-161(B). Additionally, you have the right to present evidence
18 in response to the allegations in this Notice, to have a reasonable opportunity to inspect all
19 documentary evidence, to examine witnesses, to present evidence in support of your interests,
20 and to have subpoenas issued by the Administrative Law Judge to compel the attendance of
21 witnesses and the production of evidence. If you fail to appear at the administrative hearing (the
22 “Hearing”), the Administrative Law Judge can proceed with the Hearing and issue a

1 Recommended Decision. The Director of the Arizona Department of Insurance and Financial
2 Institutions (the “Director”) can then consider the Recommended Decision and make a final
3 determination on this matter.

4 Under A.R.S. § 41-1092.07(E), a clear and accurate record of the proceedings will be
5 made by a court reporter or by electronic means. Any party that requests a transcript of the
6 proceedings shall pay the cost of the transcript for the court reporter or other transcriber.

7 **Under A.A.C. R20-6-106, within twenty (20) days after service of a Notice of Hearing,**
8 **the Respondent shall appear by filing a written Answer to the allegations in the Notice. The**
9 **Answer shall state Respondent’s position or defense and shall specifically admit or deny**
10 **each assertion in the Notice. Any allegation not denied shall be deemed admitted. Any**
11 **defense not raised will be considered waived. If a timely Answer is not filed, Respondent**
12 **may be deemed in default and the Director may deem the allegations in the Notice as true**
13 **and admitted. Accordingly, the Director may take whatever action is deemed appropriate.**

14 Pursuant to A.R.S. § 41-1092.06, the Respondent has the right to request an informal
15 settlement conference (“ISC”) by filing a written request with the Arizona Department of
16 Insurance and Financial Institutions (the “Department”) no later than **twenty (20) days** before
17 the scheduled hearing. The ISC will be held within **fifteen (15) days** after receiving the request.
18 If an ISC is requested, a person with the authority to act on behalf of the Department will be
19 present.

20 Please note that in requesting an ISC, Respondent waives any right to object to the
21 participation of the Department’s representative in the final administrative decision of this matter.

22 Any statements, either written or oral, made by the Department, Respondent, or their

1 representatives at an ISC, including a written document created or expressed solely for the
2 purpose of settlement negotiations, are inadmissible in any subsequent administrative hearing.

3 *See* A.R.S. § 41-1092.06.

4 Questions concerning issues raised in this Notice of Hearing should be directed to
5 Assistant Attorney General James Rolstead, 2005 N. Central Ave., Phoenix, Arizona 85004,
6 telephone number (602) 542-7720 or by e-mail at James.Rolstead@azag.gov.

7 The purpose of the Hearing is to determine whether grounds exist to revoke Respondent's
8 insurance producer license. In support of its position that grounds exist, the Department alleges
9 the following:

10 **PARTIES & JURISDICTION**

11 1. The Department was created and enabled to administer certain laws of the State of
12 Arizona by protecting the public interest through licensure and regulation of the insurance
13 producer profession in this state. A.R.S. § 20-142 and A.R.S. §§ 20-281 *et seq.*

14 2. Anna Kline a/k/a Jordana Weber ("Kline" or "Respondent") is a licensed Arizona
15 non-resident insurance producer, National Producer Number 20235299.

16 3. The Office of Administrative Hearings has subject matter and personal jurisdiction
17 over the named parties in this Notice of Hearing, under A.R.S. § 20-161 and A.R.S. §§ 41-1092
18 *et seq.*

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1 FACTS

2 4. On February 16, 2022, the Department issued to Kline an Arizona non-resident
3 insurance producer license with a line of authority in life insurance. Kline’s license is scheduled
4 to expire on July 31, 2025.

5 5. Kline’s home state is Iowa. Her business and mailing address of record with the
6 Department is 5249 N. Park PL. NE, Cedar Rapids, Iowa 52402. Her email addresses of record
7 are anna@redcardinalinsurance.com and sales@redcardinalinsurance.com.

8 Federal Charges Against Jordana Weber a.k.a Anna Kline

9 6. In an October 16 2022 email, Donna Herbel (“Herbel”) forwarded to the
10 Department a report (“Report”) she made to the Minnesota Department of Insurance as the
11 Designated Licensed Responsible Producer (DLRP) for Red Cardinal Insurance and Financial
12 Services, LLC (“Red Cardinal”), a Minnesota based company. Ms. Herbel states in the Report,
13 “We have learned that Anna Kline is also known as Jordana Weber. Jordana Weber has been
14 charged with financial crimes in 2017 – 2019, and this information was not disclosed by Anna
15 Kline during licensing applications or contracting as an insurance producer.”

16 7. In her email, Ms. Herbel states, “A courtesy copy [of the Report] was . . . provided
17 to the . . . Arizona Department of Insurance . . . because Red Cardinal Insurance & Financial
18 Services, LLC held a non-resident agency producer license in the State of Arizona, and Anna
19 Kline (a.k.a. Jordana Weber) is a 50 percent owner of the company.”

20 8. A U.S. Department of Justice press release dated August 1, 2019, states, “Jason M.
21 Torres, 41, and Jordana Weber, 30, of Lake Tahoe, California, are charged by complaint with one
22 count of wire fraud conspiracy and one count of money laundering.” A copy of the Criminal

1 Complaint, Mag. No. 19-7380, U.S. District Court, District of New Jersey, was attached to the
2 press release.

3 9. A letter dated August 25, 2020, sent by Kline’s attorney to the judge assigned to
4 United States v. Jordana Weber, Case No. 2:19-mj-07380 (CLW), states, “Ms. Kline’s legal name
5 is Anna Kline, notwithstanding that she is named as ‘Jordana Weber’ in the government’s
6 complaint.”

7 Kline’s Arizona Insurance License Application

8 10. On February 16, 2022, Ms. Herbel submitted Kline’s Arizona non-resident
9 insurance producer application to the Department through the National Insurance Producer
10 Registry (the “Application”). Ms. Herbel is identified on the Application as the authorized
11 submitter. Answers to the background questions were based on information provided to Ms.
12 Herbel by Kline.

13 11. Ms. Herbel, on Kline’s behalf, answered “No” to background question 1B, which
14 reads in part, “Have you ever been convicted of a felony, had a judgment withheld or deferred,
15 or are you currently charged with committing a felony?”

16 12. Ms. Herbel, on Kline’s behalf, answered “Yes” to the “Attestation” section of the
17 Application, which reads in part:

18 “I hereby certify that, under penalty of perjury, all of the information
19 submitted in this application and attachments is true and complete. I
20 am aware that submitting false information or omitting pertinent or
21 material information in connection with this application is grounds for
22 license revocation or denial of the license and may subject me to civil
penalties.”

1 13. In the Application, Ms. Herbel affirmed, “As the authorized submitter, I declare that
2 the applicant provided all the information submitted on this application.”

3 2022 Louisiana Department of Insurance Administrative Action

4 14. A review of the State Licensing Report published on the National Association of
5 Insurance Commissioner’s (NAIC) website revealed that on October 20, 2022, the Louisiana
6 Department of Insurance (“LDI”) issued a Notice of Summary Suspension of Kline’s non-
7 resident insurance producer license (“Notice”).

8 15. The Notice alleges that Kline obtained personal information of consumers and
9 submitted applications for life insurance without the consumers’ knowledge or consent. The
10 Notice further states that LDI was provided with information “stating that you [Kline] were
11 arrested on August 10, 2022 and charged with falsifying records in a federal investigation in New
12 Jersey.”

13 16. Kline did not report the summary suspension of her Louisiana insurance license to
14 the Department within 30 days of the final disposition of the matter.

15 17. On November 29, 2022, the Department sent to Kline’s addresses of record via
16 email and certified mail correspondence requesting that she provide a written response to the
17 allegations of providing untruthful information on her Arizona insurance license application. The
18 letter also referenced Kline’s failure to report the Louisiana administrative action.

19 18. Kline never responded to the Department’s requests.

20 CONCLUSIONS OF LAW

21 19. The Director has jurisdiction over this matter.

22

1 **ORIGINAL** of the foregoing filed electronically
this 2nd day of February, 2023, to:

2
3 Adam Stone, Administrative Law Judge
4 <https://portal.azoah.com/submission>
5 Office of Administrative Hearings

6 **COPY** of the foregoing delivered
7 the 2nd day of February, 2023, to:

8 Deian Ousounov, Assistant Director
9 Ana Starcevic, Paralegal Project Specialist
10 Steven Fromholtz, Licensing Division Manager
11 Wendy Greenwood, Investigations Supervisor
12 Arizona Department of Insurance and Financial Institutions
13 100 North 15th Avenue, Suite 261
14 Phoenix, Arizona 85007

15 **COPY** mailed the 2nd day of February, 2023, by
16 Regular Mail and Certified Mail, Return Receipt Requested, to:

17 Anna Kline
18 5249 N. Park Pl. NE
19 Cedar Rapids, IA 52402
20 *Respondent* 9489 0090 0027 6486 6713 27

21 Anna Kline
22 4704 Stonebridge Rd.
23 West Des Moines, IA 50265
24 *Respondent* 9489 0090 0027 6486 6713 34

25 **COPY** sent via electronic mail
26 the 2nd day of February, 2023, to:

27 Anna Kline
28 anna@redcardinalinsurance.com
29 sales@redcardinalinsurance.com
30 *Respondent*

1 James Rolstead, Assistant Attorney General
2 James.Rolstead@azag.gov
3 AdminLaw@azag.gov
4 *Attorney for the Department*

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Ana Starcevic
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Exhibit B

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED February 27, 2023 by AS

1 KRISTIN K. MAYES
Attorney General
2 Firm Bar No. 14000

3 James Rolstead
State Bar No. 025723
4 Assistant Attorney General
Public Law Section
5 2005 N. Central Ave.
Phoenix, Arizona 85004
6 Telephone: (602) 542-7720
Facsimile: (602) 542-4385
7 E-mail: James.Rolstead@azag.gov
Attorney for the Arizona Department of Insurance
8 and Financial Institutions

9 STATE OF ARIZONA
10 DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

| | |
|--|--|
| <p>11 In the Matter of:</p> <p>12 KLINE, ANNA (National Producer No. 20235299)</p> <p>13</p> <p>14 Respondent</p> | <p>No. 22A-072-INS</p> <p>MOTION FOR DEFAULT</p> |
|--|--|

15 The Arizona Department of Insurance and Financial Institutions (the "Department"),
16 by and through undersigned counsel, hereby requests that the Findings of Fact and
17 Conclusions of Law set forth in the Notice of Hearing and incorporated herein by reference
18 be entered in this matter, deeming Anna Kline ("Kline") in default, deeming the allegations
19 set forth in the Notice as true, and ordering that Respondent's insurance license be revoked.
20

21 On February 2, 2023, a Notice of Hearing and Complaint ("Notice") was filed in this
22 matter and served upon Kline at her mailing address of record via regular mail and certified
23 mail pursuant to A.R.S. § 41-1092.04. The Notice was also sent to Kline via her e-mail
24 address of record.
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1 Kline had twenty (20) days from the date of issuance of the Notice to file a written
2 answer to the allegations contained therein pursuant to Arizona Administrative Code
3 (“A.A.C”) R20-6-106. As of the date of this Motion, Kline has not filed an answer nor has
4 she appeared through counsel. Rule 20-6-106(D) of the Arizona Administrative Code
5 provides that if an answer is not timely filed, the Respondent shall be deemed in default and
6 the Director may deem the allegations set forth in the Notice of Hearing as true and take
7 whatever action is appropriate including revoking the license.
8

9 The allegations supporting the Notice of Hearing are as follows:

10 1. On February 16, 2022, the Department issued to Kline an Arizona non-
11 resident insurance producer license with a line of authority in life insurance. Kline’s license
12 is scheduled to expire on July 31, 2025.
13

14 2. Kline’s home state is Iowa. Her business and mailing address of record with
15 the Department is 5249 N. Park PL. NE, Cedar Rapids, Iowa 52402. Her email addresses of
16 record are anna@redcardinalinsurance.com and sales@redcardinalinsurance.com.

17 Federal Charges Against Jordana Weber a.k.a Anna Kline

18 3. In an October 16 2022 email, Donna Herbel (“Herbel”) forwarded to the
19 Department a report (“Report”) she made to the Minnesota Department of Insurance as the
20 Designated Licensed Responsible Producer (DLRP) for Red Cardinal Insurance and
21 Financial Services, LLC (“Red Cardinal”), a Minnesota based company. Ms. Herbel states
22 in the Report, “We have learned that Anna Kline is also known as Jordana Weber. Jordana
23 Weber has been charged with financial crimes in 2017 – 2019, and this information was not
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1 disclosed by Anna Kline during licensing applications or contracting as an insurance
2 producer.”

3 4. In her email, Ms. Herbel states, “A courtesy copy [of the Report] was . . .
4 provided to the . . . Arizona Department of Insurance . . . because Red Cardinal Insurance &
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6 Arizona, and Anna Kline (a.k.a. Jordana Weber) is a 50 percent owner of the company.”
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8 5. A U.S. Department of Justice press release dated August 1, 2019, states,
9 “Jason M. Torres, 41, and Jordana Weber, 30, of Lake Tahoe, California, are charged by
10 complaint with one count of wire fraud conspiracy and one count of money laundering.” A
11 copy of the Criminal Complaint, Mag. No. 19-7380, U.S. District Court, District of New
12 Jersey, was attached to the press release.
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19 Kline’s Arizona Insurance License Application

20 7. On February 16, 2022, Ms. Herbel submitted Kline’s Arizona non-resident
21 insurance producer application to the Department through the National Insurance Producer
22 Registry (the “Application”). Ms. Herbel is identified on the Application as the authorized
23 submitter. Answers to the background questions were based on information provided to Ms.
24 Herbel by Kline.
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1 8. Ms. Herbel, on Kline’s behalf, answered “No” to background question 1B,
2 which reads in part, “Have you ever been convicted of a felony, had a judgment withheld or
3 deferred, or are you currently charged with committing a felony?”

4 9. Ms. Herbel, on Kline’s behalf, answered “Yes” to the “Attestation” section of
5 the Application, which reads in part:

6 “I hereby certify that, under penalty of perjury, all of the
7 information submitted in this application and attachments is true
8 and complete. I am aware that submitting false information or
9 omitting pertinent or material information in connection with this
10 application is grounds for license revocation or denial of the
license and may subject me to civil penalties.”

11 10. In the Application, Ms. Herbel affirmed, “As the authorized submitter, I
12 declare that the applicant provided all the information submitted on this application.”

13 2022 Louisiana Department of Insurance Administrative Action

14 11. A review of the State Licensing Report published on the National Association
15 of Insurance Commissioner’s (NAIC) website revealed that on October 20, 2022, the
16 Louisiana Department of Insurance (“LDI”) issued a Notice of Summary Suspension of
17 Kline’s non-resident insurance producer license (“Notice”).
18

19 12. The Notice alleges that Kline obtained personal information of consumers and
20 submitted applications for life insurance without the consumers’ knowledge or consent. The
21 Notice further states that LDI was provided with information “stating that you [Kline] were
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23 New Jersey.”
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Based upon the foregoing, the Department respectfully requests that the allegations set forth in the February 2, 2023 Notice of Hearing and Complaint be deemed admitted and that Respondent’s insurance license be revoked.

RESPECTFULLY SUBMITTED this 27th day of February, 2023.

KRISTIN K. MAYES, Attorney General

By /s/ James Rolstead
James Rolstead, Assistant Attorney General
Attorney for the Arizona Department of Insurance
and Financial Institutions

COPY of the foregoing electronically filed this 27th day of February, 2023 with:

- Gio Espinosa, Regulatory Legal Affairs Officer
- Deian Ousounov, Assistant Director
- Ana Starcevic, Paralegal Project Specialist
- Michael Vukson, Investigator
- Steven Fromholtz, Division Manager, Licensing
- Arizona Department of Insurance and Financial Institutions

COPY mailed and emailed same date to:

Anna Kline
5249 N. Park Pl. NE
Cedar Rapids, IA 52402
Respondent

Anna Kline
4704 Stonebridge Rd.
West Des Moines, IA 50265
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Anna Kline
anna@redcardinalinsurance.com
sales@redcardinalinsurance.com
Respondent

/s/ S. Hack
11054943