

STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT

NH INSURANCE DEPARTMENT
2014 NOV -5 AM 11:16

In Re Paula S. Ross
Docket No.: INS 14-026-EP

CONSENT ORDER

This Consent Order is made between the New Hampshire Insurance Department (“NHID”) and the Respondent, Paula S. Ross (“Respondent”).

1. At all relevant times, the Respondent was a resident New Hampshire insurance producer.
2. Although the Respondent’s producer license lapsed by operation of law on June 30, 2014, the NHID, pursuant to RSA 402-J:12,V, retains authority over the Respondent to investigate and enforce any violation of New Hampshire insurance law committed by the Respondent while she was licensed.
3. The NHID maintains that the following facts would be established at an adjudicative hearing:
 - a. In April 2013, the Respondent was responsible for ensuring that a workers compensation policy was issued for Pro City Facility Services LLC (“Pro City”) through the New Hampshire Workers Compensation Residual Market Plan. The Respondent failed to secure workers compensation coverage for Pro City. As a result, Pro City thereafter unwittingly conducted business without the legally-required workers compensation coverage.
 - b. Subsequently, and over a period of months, the Respondent, knowing there was no workers compensation policy in force, prepared, signed and delivered four certificates

of insurance to four different certificate holders indicating Pro City had workers compensation coverage when it did not.

c. On November 26, 2013, Pro City, believing it already had in-force workers compensation coverage in New Hampshire, asked the Respondent if the State of Maine could be added as another location to Pro City's workers compensation policy. Although the Respondent knew Pro City had no workers compensation coverage in New Hampshire, the Respondent advised Pro City she would determine whether or not Maine could be added to the workers compensation policy.

d. On January 28, 2014, Pro City informed the Respondent it needed to supply the New Hampshire Department of Labor ("DOL") with evidence of workers compensation coverage. In response, the Respondent used documents pertaining to a valid workers compensation policy for an insured that was not Pro City and doctored those documents to make it appear Pro City had workers compensation coverage. The doctored documents were submitted to the DOL.

WHEREFORE, it is hereby agreed and ordered:

- A. The foregoing recitals are hereby adopted, incorporated into and made a part of this Consent Order.
- B. The Respondent agrees to the revocation of her New Hampshire insurance producer's license. However, the Respondent does not admit to any violation of New Hampshire insurance law and enters this Consent Order to purchase her peace and to resolve the allegations at issue in this case.

C. The Respondent acknowledges that by entering into this Consent Order she waives the right to an administrative hearing in which the above-described matters would be adjudicated before a Hearing Officer.

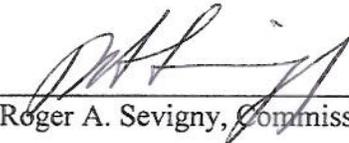
D. By entering into this Consent Order, the NHID and the Respondent intend to resolve all issues relating to the misconduct alleged herein. This Consent Order shall be deemed a full and final resolution and is in lieu of any other action that could have been brought by the NHID relating to matters disclosed herein.

F. This Consent Order shall be fully enforceable in any Superior Court in the State of New Hampshire and shall be governed by the laws of the State of New Hampshire.

It is SO ORDERED

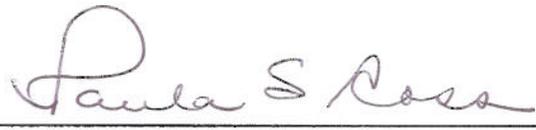
New Hampshire Insurance Department

Dated: 11-5-14



Roger A. Sevigny, Commissioner

Dated: Nov. 4, 2014



Paula S. Ross, Respondent