



## DEPARTMENT OF COMMERCE AND INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

IN RE:

MIGUEL EDUARDO,  
ROMERO MEJIA,

Applicant.

Case No. 2501240117C

### ORDER REFUSING TO ISSUE AN INSURANCE PRODUCER LICENSE

ANGELA L. NELSON, Director of the Missouri Department of Commerce and Insurance ("Director" of the "Department"), takes up the above matter for consideration and disposition. After reviewing the Petition, the Investigative Report, and the entirety of the file, the Director issues the following findings of fact, conclusions of law and order:

### FINDINGS OF FACT

1. Miguel Eduardo Romero Mejia ("Mejia") is a Florida resident with the following reported residential, business, mailing, and email addresses: 5450 Bruce B Downs Blvd., Ste 173, Wesley Chapel, FL 33544; insuranceagent00724@gmail.com (business email) and xmigueliito23@gmail.com (individual applicant email).
2. On or about September 24, 2024, the Department received Mejia's online application for a nonresident insurance producer license ("Application").
3. Background Question Number 2 on the Application asks, in part:

Have you ever been named or involved as a party in an administrative proceeding, including FINRA sanction or arbitration proceeding regarding any professional or occupational license or registration? "Involved" means having a license censured, suspended, revoked, canceled, terminated; or, being assessed a fine, a cease and desist order, a prohibition order, a compliance order, placed on probation, sanctioned or surrendering a license to resolve

an administrative action. “Involved” also means being named as a party to an administrative or arbitration proceeding, which is related to a professional or occupational license, or registration. “Involved” also means having a license, or registration application denied or the act of withdrawing an application to avoid a denial.

4. Mejia answered “no” to Background Question Number 2 on the Application.

#### **Pennsylvania Administrative Action**

5. Mejia was a licensed nonresident producer in Pennsylvania. He was selling Medicare and other health insurance policies for various carriers.
6. One of the appointed carriers received multiple complaints related to Mejia enrolling consumers into health care policies without their knowledge or consent. The carrier conducted an investigation based on these complaints.
7. As a result of the investigation, Mejia was terminated from his employing agency and the carrier.
8. On July 12, 2024, Mejia entered into a Consent Order with the Insurance Commissioner of the Commonwealth of Pennsylvania. *In re: Miguel Eduardo Romero Mejia*, Docket No. CO24-06-019 (Before the Ins. Comm’r, Commonwealth of Pennsylvania).
9. The Pennsylvania Consent Order found that: (a) Mejia was investigated by an appointed carrier following the receipt of multiple complaints related to enrolling consumers into health care policies without their knowledge or consent; (b) as a result of the investigation by the appointed carrier, Mejia was terminated from both his employing agency and from the carrier; (c) Mejia was found to have enrolled at least one Pennsylvania consumer into a health care plan without her knowledge or consent; and (d) Mejia failed to update his address and contact information within thirty days of his termination from his employing agency.
10. The Pennsylvania Insurance Department determined Mejia violated 40 P.S. § 310.11(6), (7), (17), (19), and (20).
11. Mejia’s Pennsylvania nonresident insurance producer license was revoked with the consent of all parties.
12. It is inferable, and hereby found as fact, that Mejia misrepresented and failed to disclose the Pennsylvania administrative action to induce the Director to issue him a Missouri license.

#### **Missouri Department’s Review of Mejia’s Nonresident Insurance Producer Application**

13. On or about September 26, 2024, Senior Regulatory Auditor Karen Crutchfield (“Crutchfield”) emailed a letter to Mejia, noting that there was an administrative action not reported on the Application. Crutchfield requested a copy of the order and an explanation of the omission from the Application.

14. Mejia did not respond to the email sent on September 26, 2024.
15. On or about October 17, 2024, Crutchfield sent an inquiry letter to Mejia at 5450 Bruce B Downs Blvd., Ste. 173, Wesley Chapel, FL 33544. The letter noted that Mejia did not report the administrative action in Pennsylvania on his Application. Crutchfield requested a copy of the order and an explanation for the omission. The inquiry letter cited 20 CSR 100-4.100 and advised that a response was due within twenty days.
16. The letter was not returned to the Department as undeliverable.
17. Mejia did not respond to this inquiry letter sent on October 17, 2024 and did not demonstrate reasonable justification for the delay.
18. On or about November 12, 2024, Crutchfield sent a second inquiry letter to Mejia, requesting the same information about the Pennsylvania administrative action. Crutchfield sent the letter to two addresses: 5450 Bruce B Downs Blvd., Ste. 173, Wesley Chapel, FL 33544, the address listed on the Application, and 7429 Shore Acres St., Wesley Chapel, FL 33545-4249, which Crutchfield determined was Mejia's home address. Both letters cited 20 CSR 100-4.100 and advised that a response was due within twenty days.
19. Neither letter was returned to the Department as undeliverable.
20. Mejia did not respond to the second inquiry letter sent on November 12, 2024 and did not demonstrate reasonable justification for the delay.
21. On December 5, 2024, Crutchfield sent an email to Scott Savett at Enhance Health, LLC, Mejia's employer, who was the authorized submitter of the Application for Mejia. Crutchfield advised Mr. Savett that she had attempted to reach Mejia about the Pennsylvania administrative action but was not successful. She asked Mr. Savett to have Mejia contact her or to have the Application withdrawn.
22. Neither Mr. Savett nor Mejia responded to this email.
23. It is inferable, and hereby found as fact, that Mejia omitted the Pennsylvania administrative action to induce the Director to issue a Missouri license to him.

### **CONCLUSIONS OF LAW**

24. Section 375.141.1 provides, in pertinent part:

The director may suspend, revoke, refuse to issue or refuse to renew an insurance producer license for any one or more of the following causes:

- (1) Intentionally providing materially incorrect, misleading, incomplete or untrue information in the license application;

(2) Violating any insurance laws, or violating any regulation, subpoena or order of the director or of another insurance commissioner in any other state;

(3) Obtaining or attempting to obtain a license through material misrepresentation or fraud;

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

(9) Having an insurance producer license, or its equivalent, denied, suspended or revoked in any other state province, district or territory[.]

25. Title 20 CSR 100-4.100(2)(A) is one of the Department's regulations. It provides as follows:

Upon receipt of any inquiry from the division, every person shall mail to the division an adequate response to the inquiry within twenty (20) days from the date the division mails the inquiry. An envelope's postmark determines the date of mailing. When the requested response is not produced by the person within twenty (20) days, this nonproduction is deemed a violation of this rule, unless the person can demonstrate that there is reasonable justification for that delay[.]

26. Under Missouri law, when a letter is duly mailed by first-class mail, there is a rebuttable presumption that the letter was delivered to the addressee and that the party was properly notified. *Breckle v. Treas. of the State of Missouri*, 216 S.W.3d 899, 902 (Mo. App. 2017).
27. The dictionary definition of "material" is "having real importance or great consequences[.]" MERRIAM-WEBSTER COLLEGIATE DICTIONARY, 765 (11<sup>th</sup> ed. 2004); *Dir of Com. and Ins. v. Erica Nichole Mickle*, Mo. Admin. Hrg. Comm'n, Case No. 21-1453 (Sept. 9, 2021).
28. A misrepresentation is material if the Department "acting reasonably and naturally in accord with [its] custom and practice would have relied on the representation." *Smith ex rel. Stephan v. AF&L Ins. Co.*, 147 S.W.3d 767, 774 (Mo. App. 2004).
29. Mejia may be refused a nonresident insurance producer license under § 375.141.1(1) because he provided materially false information on his Application when he answered "No" to Background Question Number 2 when he entered into a Consent Order with the

Pennsylvania Insurance Commissioner to revoke his Pennsylvania nonresident insurance producer license approximately two months earlier.

30. Mejia may be refused a nonresident insurance producer license under § 375.141.1(3) because his response to Background Question 2 was a material misrepresentation made in order to obtain a Missouri nonresident insurance producer license.
31. Mejia may be refused a nonresident insurance producer license under § 375.141.1(8) because he exhibited untrustworthiness when he admitted to enrolling Pennsylvania consumers into health care policies without their knowledge or consent.
32. Mejia may be refused a nonresident insurance producer license under § 375.141.1(9) because his Pennsylvania nonresident insurance producer license was revoked, by consent, when he admitted to enrolling consumers into health care policies without their knowledge or consent.
33. Mejia may be refused a nonresident insurance producer license under § 375.141.1(2) because he failed to adequately respond to two inquiries, dated October 17, 2024 and November 12, 2024, from the Division and failed to provide reasonable justification for the delay, thereby violating 20 CSR 100-4.100(2)(A), a Department regulation.
34. Given these facts, granting Mejia an insurance producer license would not be in the interest of the public. Accordingly, the Director exercises her discretion to refuse to issue an insurance producer license to Mejia.
35. This Order is in the public interest.

### **ORDER**

**IT IS THEREFORE ORDERED** that the nonresident insurance producer license application of **Miguel Eduardo Romero Mejia** is hereby **REFUSED**.

WITNESS MY HAND THIS 10<sup>th</sup> DAY OF April, 2025.



  
ANGELA L. NELSON  
DIRECTOR

## **NOTICE**

**TO: Applicant and any unnamed persons aggrieved by this Order:**

You may request a hearing in this matter. You may do so by filing a complaint with the Administrative Hearing Commission of Missouri, P.O. Box 1557, Jefferson City, Missouri, within 30 days after the mailing of this notice pursuant to Section 621.120, RSMo. Pursuant to 1 CSR 15-3.290, unless you send your complaint by registered or certified mail, it will not be considered filed until the Administrative Hearing Commission receives it.

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### CERTIFICATE OF SERVICE

I hereby certify that on this 11 day of APRIL, 2025, a copy of the foregoing Order and Notice was served upon the Applicant in this matter by United Parcel Service (UPS), with signature required, at the following addresses:

Miguel Eduardo Romero Mejia  
5450 Bruce B Downs Blvd., Ste. 173  
Wesley Chapel, FL 33544

Tracking No. **1ZP45W84299742698**

Miguel Eduardo Romero Mejia  
7429 Share Acres St.  
Wesley Chapel, FL 33545-4249

Tracking No. **1ZP215W84296319940**



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