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**BEFORE THE UTAH INSURANCE COMMISSIONER**

UTAH INSURANCE DEPARTMENT,  Complainant,  vs.  QIUNAN CHANG,  Respondent.	NOTICE OF AGENCY ACTION AND ORDER  Docket No. 2023-4499  Donald H. Hansen Administrative Law Judge/Presiding Officer
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**NOTICE OF AGENCY ACTION**

The Utah Insurance Department (“the Department”) commences this agency action as an informal adjudicative proceeding against Respondent Qiunan Chang (“Respondent”) pursuant to Utah Code §§ 31A-2-201 and 63G-4-201 through -203 and to Utah Admin. Code R590-160.

This agency action is based on the facts and law set forth in the attached Declaration and is designated as an informal adjudicative proceeding pursuant to Utah Code § 63G-4-202(1) and Utah Admin Code R590-160-4 and -7.

**ORDER**

Based on the facts and the law set forth in the attached Declaration, and good cause appearing, the Utah Insurance Commissioner orders as follows:

1. Respondent's Utah non-resident producer individual insurance license, number 873220 is revoked.

2. Pursuant to Utah Code § 63G-4-203(1)(i) and Utah Admin. Code R590-160-7(1), this informal adjudicative proceeding shall be deemed closed, and this Order shall become final and take full effect, 15 days after this Notice of Agency Action and Order is emailed to Respondent unless a request for a hearing on this matter is received from Respondent prior to that date.

3. A request for a hearing shall be in writing and sent by email to [uidadmincases@utah.gov](mailto:uidadmincases@utah.gov) or by U.S. mail to Office of the Administrative Law Judge, Utah Insurance Department, 4315 S. 2700 W., Suite 2300, Taylorsville, UT 84129.

4. The request for hearing shall be signed by the person making the request and shall state the basis for the relief requested.

5. If you fail to request a hearing you will be bound by this Order. Failure to request a hearing will be deemed a failure to exhaust administrative remedies and will preclude any further administrative or judicial review or appeal of this matter.

DATED this 24<sup>th</sup> day of May 2023.

JONATHAN T. PIKE  
Utah Insurance Commissioner

/s/ Donald H. Hansen  
DONALD H. HANSEN  
Administrative Law Judge/Presiding Officer  
Utah Insurance Department  
4315 S. 2700 W., Suite 2300  
Taylorsville, UT 84129  
Telephone: (801) 957-9321  
Email: [uidadmincases@utah.gov](mailto:uidadmincases@utah.gov)

### **NOTICE REGARDING ENFORCEMENT OF THE ORDER**

Failure to obey the Order may subject you to further penalties that include a forfeiture of up to \$2,500 per violation, with each day of the violation constituting a separate violation. Other penalties for failing to obey this Order include license suspension, probation, refusal to renew, or revocation. Failure to obey this Order may also result in an action being taken against you in a court of competent where forfeitures of up to \$10,000 for each day the failure to comply continues until judgement is rendered. If you are licensed in other jurisdictions, you may be required to report this proceeding to those jurisdictions.

## **DECLARATION**

Under criminal penalty of Utah law, I, Connie Nowland, declare the following:

1. I am currently employed as a Market Conduct Examiner with the Utah Insurance Department (“Department”) where my responsibilities include investigating and enforcing Utah insurance laws.

2. I submit this Declaration as the basis for issuing the Notice of Agency Action and Order against Qiunan Chang (“Respondent”) to which this Declaration is attached.

3. Based on my personal knowledge and/or based on the facts appearing in the Department’s records and files, the following facts are true:

a. Respondent is a non-resident producer individual licensee, domiciled in Texas, and authorized to do insurance business in Utah under license number 873220.

b. On December 13, 2022, the Department received a complaint, dated December 1, 2022, from UnitedHealthcare Insurance Company (United Healthcare) indicating the employment of the Respondent had been terminated for cause, effective November 23, 2022.

c. The complaint alleged that the Respondent had been terminated for cause from UnitedHealthcare after they had investigated several consumer complaints which alleged the Respondent had enrolled at least six (6) consumers in health insurance plans without their knowledge or consent.

d. On February 17, 2023, and again on February 21, 2023, the Department, through examiner Connie Nowland, sent a request for supporting documents to United Healthcare requesting documentation on how they reached the decision for the termination of the Respondent.

e. Between March 2, 2023, through May 19, 2023, United Healthcare provided the Department with a copy of their investigation, alleging the Respondent forged signatures on insurance applications in six specific cases.

f. Out of the six alleged forgeries, United Healthcare received two written attestations that the signatures on both the Scope of Appointment forms and Enrollment applications were not signatures of the enrollees, and one verbal attestation to the same effect.

g. United Healthcare also discovered that the Respondent claimed to have received non-remote (in person) signatures on the same dates as the alleged forgeries as follows:

i. Respondent claimed to have obtained non-remote signatures from enrollees on March 29, 2022, in Louisiana and Florida;

ii. Respondent claimed to have obtained non-remote signatures from enrollees on April 30, 2022, in Florida, California, and Georgia.

iii. Respondent claimed to have obtained non-remote signatures from enrollees on April 27, 2022, in Louisiana and Missouri.

iv. Respondent claimed to have obtained non-remote signatures from enrollees on June 30, 2022, in Michigan, South Carolina, Oregon, Missouri, and California.

h. When United Healthcare asked the Respondent for written statements as to the allegations, Respondent either failed to respond to United Healthcare, or provided no useful information as to the specific allegations.

i. On February 8, 2023, the Department, through examiner Connie Nowland, sent the Respondent a request for information and requested that the Respondent provide a response to the Department regarding the United Healthcare allegations.

j. On February 14, 2023, Respondent answered the Department's request for information, but failed to provide any of the information requested by the Department into the United Healthcare allegations. In his response, the Respondent only stated, "I handle my calls compliantly, this is the first time a company like UHC has terminated me and it will not happen again."

k. On March 30, 2023, the Nebraska Department of Insurance revoked Respondent's Nebraska non-resident license, after entering findings of fact that "the Respondent engaged in behavior that is indicative of fraudulent and dishonest practices, and untrustworthiness in the conduct of insurance business."

l. The Respondent failed to report the Nebraska license revocation to the Department as required by Utah Code §§ 31A-23a-105(2) and 31A-23a-111 (7).

4. The above declared facts demonstrate that the following Utah insurance laws were not complied with:

a. Respondent violated Utah Code § 31A-23a-111(5)(b)(xvii), by having had an insurance license or other professional or occupational license, or an equivalent to an insurance license or registration or other professional or occupational license or registration denied, suspended, revoked, or surrendered to resolve an administrative action;

b. Respondent violated Utah Code § 31A-23a-111(7)(a) by failing to immediately report to the commissioner a revocation, suspension, or limitation of the Respondent's license in another state, the District of Columbia, or a territory of the United States;

c. Respondent violated Utah Code § 31A-23a-105(2)(b)(i) by failing to report to the commissioner an administrative action taken against the person, including a denial of a new or

renewal application in another jurisdiction, within 30 days of the final disposition of the administrative action;

d. Respondent violated Utah Code § 31A-23a-111(7)(b) by failing to immediately report to the commissioner the imposition of a disciplinary sanction imposed on the Respondent by another state, the District of Columbia, or a territory of the United States;

e. Respondents violated Utah Code § 31A-23a-111(5)(b)(xviii), by forging another's name to an application for insurance or a document related to an insurance transaction;

f. Respondent violated Utah Code § 31A-23a-111(5)(b)(xxiv), by engaging in a method or practice in the conduct of business that endangers the legitimate interests of customers and the public;

g. Respondent violated Utah Code § 31A-23a-111(5)(b)(xvi), when in the conduct of business in this state or elsewhere used fraudulent, coercive, or dishonest practices; or demonstrated incompetence, untrustworthiness, or financial irresponsibility;

h. Respondent violated Utah Code § 31A-23a-105(5)(a)(ii) by committing an act that is grounds for denial, suspension, or revocation as set forth in Section 31A-23a-111;

i. Respondent violated Utah Code § 31A-23a-107(2)(a)(ii) by failing to meet the trustworthy character requirement;

j. Respondent violated Utah Code § 31A-23a-111(5)(b)(i) by being unqualified for a license under Utah Code § 31A-23a-104, 105, or 107;

k. Respondent violated Utah Code § 31A-2-202(6), by failing to provide information submitted to the commissioner that is accurate and complete;

l. Respondent violated Utah Code § 31A-23a-111(5)(b)(ii)(A) by violating an insurance statute as outlined herein;

m. Respondent violated Utah Code § 31A-23a-111(5)(b)(x), by violating an insurance law, valid rule, or valid order of another regulatory agency in any jurisdiction;

n. Respondents violated Utah Code § 31A-23a-111(5)(b)(xiii), by intentionally misrepresenting the terms of an actual or proposed insurance contract, application for insurance, or life settlement; and

o. Respondent violated Utah Code § 31A-23a-111(5)(b)(xv) by having admitted or been found to have committed an insurance unfair trade practice or fraud.

5. Based on the facts and law set forth above, Respondent's non-resident producer individual insurance license should be revoked.

Signed on this 23rd day of May 2023, in Salt Lake City, Salt Lake County, State of Utah.

/s/ Connie Nowland  
Connie Nowland, Investigator  
Market Conduct Division  
Utah Insurance Department



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date a true and correct copy of the foregoing  
Notice of Agency Action and Order, with the Declaration attached to it, was emailed to:

Qiunan Chang  
[REDACTED]  
[REDACTED]  
[REDACTED]

and

Connie Nowland  
Utah Insurance Department  
4315 S. 2700 W., Suite 2300  
Taylorsville, UT 84129  
[cnowland@utah.gov](mailto:cnowland@utah.gov)

DATED this 24<sup>th</sup> day of May, 2023.

*/s/ Tatiana Karaivanova*

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Tatiana Karaivanova  
Utah Insurance Department  
4315 S. 2700 W., Suite 2300  
Taylorsville, UT 84129  
(801) 957-9321