



## State of Utah

GARY R. HERBERT  
Governor

GREG BELL  
Lieutenant Governor

NEAL T. GOOCH  
Insurance Commissioner

# Insurance Department

June 28, 2010

## PUBLIC LETTER OF ADMONITION

John Richmond, VP of Regulatory Affairs  
AAA Northern California, Nevada & Utah  
3055 Oak Road  
Walnut Creek, CA 94597

Re: Investigative case #58144 – Automobile Club of Utah - Utilization of unlicensed and non designated limited line producers

Based upon information contained in Utah Insurance Department files, Automobile Club of Utah is hereby issued this Public Letter of Admonition. In failing to ensure that all your employees involved in the solicitation, negotiation and/or sales of travel insurance were properly licensed and designated to your agency, Automobile Club of Utah violated the following statutes and rule and subject to penalties as allowed by law:

**Utah Code Annotated (U.C.A.) §31A-23a-103(1) (a) & (c)** states “Unless exempted from the licensing requirement under 31A-23a-207 or 31A-23a-207, a person may not perform, offer to perform, or advertise any service as a producer, limited line producer... without a valid individual or agency license issued under this chapter. A person may not utilize the services of another as a producer, limited line producer... if that person knows or should know that the other does not have a license as required by law”.

**Utah Code Annotated (U.C.A.) §31A-23a-302(1) & (2)** states “An agency shall designate an individual producer, limited line producer... to act on the agency’s behalf in order for the licensee to do business for the agency in this state. An agency shall report to the commissioner, at intervals and in the form the commissioner establishes by rule a new designation and a terminated designation”.

**Utah Administrative Code Insurance Rule R590-244-10(1) & (2)** states “An agency shall electronically designate a licensed individual to do business on behalf of the agency in this state... and to submit the designation to the commissioner no later than 15 day after the identified effective date of designation using SIRCON or NIPR.... and to terminate an individual’s designation... no later than 30 days after the identified effective date of termination”.

At this time, the recommendation for Automobile Club of Utah to forfeit \$3000 per violation is waived on the condition that current and future employees involved in the solicitation,

negotiation and sales of travel insurance are properly licensed and designated to your agency. For information regarding proper licensing and agency designation, the producer licensing division is an available resource and may be contacted at 801-538-3855 or email [licensing.uid@utah.gov](mailto:licensing.uid@utah.gov). You may also review information regarding Limited Lines Producers Licenses in Utah Insurance Bulletin 2010-3, at our website – [www.insurance.utah.gov](http://www.insurance.utah.gov).

Failure to ensure all employees who are involved in the solicitation, negotiation and sales of travel insurance are properly licensed and designated, will be cause for an immediate reinstatement of the recommendation action of the \$3000 per violation forfeiture?

Any questions regarding this action should be directed to the undersigned.

Respectfully,

NEAL T. GOOCH  
INSURANCE COMMISSIONER

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