

## DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION

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

IN RE: HANEEN GHOULEH 3719 MADISON ST. OAK BROOK, IL 60523 TRACKING ID 319089E

## **VOLUNTARY FORFEITURE AGREEMENT**

It is hereby agreed by Haneen Ghouleh and the Consumer Affairs Division of the Department of Insurance, Financial Institutions and Professional Registration, as follows:

WHEREAS, Chlora Lindley-Myers, is the duly appointed Director of the Department of Insurance, Financial Institutions and Professional Registration, State of Missouri (hereinafter, "Director" of the "Department"), whose duties, pursuant to Chapters 374 and 375, RSMo, include the supervision and regulation of the business of insurance;

WHEREAS, the Consumer Affairs Division of the Department is charged with investigating producers and companies engaged in the business of insurance pursuant to Sections 374.085 and 374.190, RSMo and is authorized by the Director to recommend enforcement action under the laws relating to insurance;

WHEREAS, Haneen Ghouleh ("Ghouleh") applied to renew her non-resident individual insurance producer license with the Department, pursuant to Chapter 375, RSMo;

WHEREAS, the Consumer Affairs Division has received information concerning Ghouleh's failure to disclose an administrative action from the state of New York within the required timeframe of thirty (30) days, which is a violation of Section 375.141.6, RSMo (2016), and subjects Ghouleh to enforcement action by the Director;

WHEREAS, Ghouleh has been informed of her right to counsel and of her right to contest any attempt by the Department to revoke her insurance producer license, and states that she understands her rights to contest any such actions;

AND WHEREAS, Ghouleh acknowledges and admits for purposes of this Agreement and for purposes of any future action by the Director or the Consumer Affairs Division based on any additional violations of the insurance laws or regulations by Ghouleh, in which action the Director or the Consumer Affairs Division alleges that the violations described herein form part of a course of conduct, a business practice, or other such series of similar violations, or that future violations by Ghouleh are committed knowingly, intentionally or in conscious disregard of the law, that she failed to report an administrative action in the state of New York, and that such conduct violated Section 374.210.1(1), RSMo (2016);

NOW, THEREFORE, in lieu of any recommendation or initiation by the Consumer Affairs Division of any action based on the violation cited in this Agreement, and after being afforded the opportunity to consult legal counsel, Ghouleh does hereby voluntarily and knowingly surrender and forfeit the sum of two hundred fifty dollars (\$250.00), such sum to be paid into the State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

Ghouleh shall submit the sum to the Department by cashier's check or money order made

payable to the State School Moneys Fund no later than August 27, 2018.

The parties agree that, should the Director or the Division in the future allege an additional violation of the insurance laws or regulations by Ghouleh, nothing in the Agreement shall preclude the Director or the Consumer Affairs Division from introducing Ghouleh's admissions contained in this Agreement as evidence that the acts described herein form part of a course of conduct, a business practice, or other such series of similar violations, or for purposes of showing that such later alleged acts are committed knowingly, intentionally or in conscious disregard of the law.

DATED:

9/6/18

DATED: 10 September 2018

Hancen Ghouley

License No. 8092224

Carrie Couch, Director Consumer Affairs Division

Chlora Lindley-Myers, Director

Department of Insurance, Financial

Institutions and Professional Registration

Return original to:
Dana Whaley
Missouri Department of Insurance,
Financial Institutions and Professional Registration
PO Box 4001
Jefferson City, MO 65102