

BEFORE THE INSURANCE COMMISSIONER OF THE  
STATE OF OKLAHOMA

**FILED**  
SEP 15 2020  
INSURANCE COMMISSIONER  
OKLAHOMA

STATE OF OKLAHOMA, ex rel. GLEN )  
MULREADY, Insurance Commissioner, )  
 )  
Petitioner, )  
v. )  
 )  
ANDREW ARNOLD, )  
a resident producer, )  
 )  
CASEY SCOTT, )  
a resident producer, )  
 )  
Respondents. )

Case No. 20-0360-DIS

**CONDITIONAL ADMINISTRATIVE ORDER**  
**AND NOTICE OF RIGHT TO BE HEARD**

COMES NOW the State of Oklahoma, ex rel. Glen Mulready, Insurance Commissioner,  
by and through his counsel, Sara Worten, and alleges and states as follows:

**JURISDICTION**

1. Glen Mulready is the Insurance Commissioner of the State of Oklahoma and is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O.S. §§ 101 et seq. including the Oklahoma Producer Licensing Act, 36 O.S. § 1435.1 et seq.
2. Respondent Andrew Arnold (“Respondent Arnold”) holding license number 40002700, is licensed by the State of Oklahoma as a resident insurance producer as defined and required by 36 O.S. § 1435.2(7). His address of record is 13140 N. MacArthur Blvd., Oklahoma City, OK 73142.
3. Respondent Casey Scott (“Respondent Scott”) holding license number 40100587, was licensed by the State of Oklahoma as a resident insurance producer as defined and required by 36 O.S. § 1435.2(7). Her license expired May 2019 and she has applied for renewal of her resident

insurance producer license. Respondent Scott's residence address of record is 1036 NW 15<sup>th</sup> Street, Moore, OK 73160.

4. The Insurance Commissioner may place on probation, censure, suspend, revoke or refuse to issue or renew a license issued pursuant to the Oklahoma Producer Licensing Act and/or may levy a fine up to \$1,000.00 for each occurrence of a violation of the Oklahoma Insurance Code. *36 O.S. § 1435.13(A) and (D)*.

### **FINDINGS OF FACT**

1. On or about January 28, 2020, the Anti-Fraud Unit of the Oklahoma Insurance Department (the "Department") received a request for investigation of Respondent Arnold and Respondent Scott due to a complaint received from State Farm Mutual Auto Insurance Company ("State Farm").

2. Investigator Jon Huntington, an investigator with the Department, was assigned to investigate the matter.

3. The complaint received alleged that Respondent Arnold and Respondent Scott had engaged in data quote manipulation.

4. The investigation revealed that both Respondent Arnold and Respondent Scott had a practice of manipulating the data entered into the State Farm quoting system to either make a potential client eligible for car insurance or lower the premium for car insurance.

5. The Respondents would accomplish this by:

- a. Adding drivers who were not exposures on the vehicle(s); and/or
- b. Removing drivers who had records that would either disqualify them from obtaining insurance from State Farm or would result in a higher premium rate.

6. Pursuant to the provisions of *36 O.S. § 1435.13*, the Insurance Commissioner may place on probation, censure, suspend, revoke or refuse to issue or renew a license issued pursuant to the Oklahoma Producer Licensing Act or may levy a civil penalty in accordance with subsection D of this section or any combination of actions for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere.

7. In addition to or in lieu of any applicable denial, probation, censure, suspension or revocation of a license, a person may, after opportunity for hearing, be subject to a civil fine of not less than One Hundred Dollars (\$100.00) nor more than One Thousand Dollars (\$1,000.00) for each occurrence. Said penalty may be enforced in the same manner in which civil judgments may be enforced. *36 O.S. § 1435.13 (D)*

#### **CONCLUSIONS OF LAW**

1. Respondents violated *36 O.S. § 1435.13(A)(8)* by using dishonest practices in the conduct of business in this state by manipulating data input into State Farm's quoting system in an effort to obtain lower premium rates for potential customers and/or qualify potential customers for insurance through State Farm.

#### **ORDER**

**IT IS THEREFORE ORDERED** by the Insurance Commissioner that Respondents are hereby **CENSURED** and each **FINED FIVE HUNDRED DOLLARS (\$500.00)** for violation of *36 O.S. § 1435.13(A)(1)*. **The Respondents' each individual \$500.00 fine is to be paid within thirty (30) days** made payable to the Oklahoma Insurance Department. The \$500.00 civil fine shall be paid by **money order or cashier's check**. Failure to pay the civil fine or request a hearing within thirty (30) days will result in your license application being withdrawn.

**IT IS FURTHER ORDERED** that each Respondent is required to complete **three (3) hours of continuing education in ethics** within thirty (30) days of the receipt of this order. Respondent Scott's application for a resident insurance producer license may be granted upon receipt of payment of the fine and completion of the 3 hours of ethics.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** by the Insurance Commissioner that this Order is a Conditional Order. Unless the Respondents request a hearing with respect to the Findings of Fact set forth above within thirty (30) days of the date of mailing of this Order, this Order and the penalties set forth above will become a Final Order on the thirty-first day following the date of mailing this Order. A request for hearing should be in writing addressed to Sara A. Worten, Oklahoma Insurance Department, Legal Division, 400 NE 50<sup>th</sup> Street, Oklahoma City, Oklahoma 73105. The request for hearing must state the grounds for the request to set aside or modify the Order.

Any such hearing will be conducted according to the procedures for contested cases under the Insurance Code and 75 O.S. § 250-323. If the Respondent(s) serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order will act as notice of the matters to be reviewed at the hearing, and the Findings of Fact, Violations of Law, and penalties imposed in this Conditional Order will be considered withdrawn, pending final resolution at the hearing.



WITNESS My Hand and Official Seal this 15<sup>th</sup> day of September 2020.



GLEN MULREADY  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA

/s/ Sara Worten  
Sara A. Worten  
Assistant General Counsel  
400 NE 50<sup>th</sup> Street  
Oklahoma City, OK 73105  
(405) 521-2746

**CERTIFICATE OF MAILING**

I, Sara A. Worten, hereby certify that a true and correct copy of the above and foregoing Consent was sent by electronic mail and mailed by first class U.S. Mail and by certified mail with postage prepaid and return receipt requested on this 15<sup>th</sup> day of September 2020 to:

Casey Scott  
1036 NW 15<sup>th</sup> Street  
Moore, OK 73160  
(residential address)  
[Caseydscott21@gmail.com](mailto:Caseydscott21@gmail.com)  
[Caseydawn1420@gmail.com](mailto:Caseydawn1420@gmail.com)

**CERTIFIED MAIL NO:**  
**9214 8902 0982 7500 0312 31**

Andrew Arnold  
9805 Blue Bonnet Drive  
Oklahoma City, OK 73159  
(residential address)  
[Drew2one@gmail.com](mailto:Drew2one@gmail.com)

**CERTIFIED MAIL NO:**  
**9214 8902 0982 7500 0312 48**

Andrew Arnold  
13140 N. MacArthur Blvd.  
Oklahoma City, OK 73142

**CERTIFIED MAIL NO:**  
**9214 8902 0982 7500 0312 55**

and that a copy was delivered to:

Jon Huntington Anti-Fraud Team  
Courtney Phillips/Producer Licensing Division

/s/ Sara Worten  
Sara A. Worten



20-0360-Dis  
(Scott) ASD  
STW



Date Produced: 09/28/2020

OKLAHOMA INSURANCE DEPARTMENT:

The following is the delivery information for Certified Mail™/RRE item number 9214 8902 0982 7500 0312 31. Our records indicate that this item was delivered on 09/24/2020 at 09:45 a.m. in OKLAHOMA CITY, OK 73105. The scanned image of the recipient information is provided below.

Signature of Recipient :

FL  
CV19506

Address of Recipient :

400 WEST

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,  
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

This USPS proof of delivery is linked to the customers mail piece information on file as shown below:

CASEY SCOTT  
1036 NW 15TH ST  
MOORE OK 73160-1404

Customer Reference Number: C2268153.12898032

20-0360-Dis  
Arnold (Saw)



Date Produced: 09/28/2020

OKLAHOMA INSURANCE DEPARTMENT:

The following is the delivery information for Certified Mail™/RRE item number 9214 8902 0982 7500 0312 48. Our records indicate that this item was delivered on 09/24/2020 at 09:45 a.m. in OKLAHOMA CITY, OK 73105. The scanned image of the recipient information is provided below.

Signature of Recipient :

FL  
C/19506

Address of Recipient :

400 WEST 5th

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,  
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

This USPS proof of delivery is linked to the customers mail piece information on file as shown below:

ANDREW ARNOLD  
9805 BLUE BONNET DR  
OKLAHOMA CITY OK 73159-7409

Customer Reference Number: C2268153.12898034





20-0360-D15  
Arnold/McArthur  
(BHW)

Date Produced: 09/21/2020

OKLAHOMA INSURANCE DEPARTMENT:

The following is the delivery information for Certified Mail™/RRE item number 9214 8902 0982 7500 0312 55. Our records indicate that this item was delivered on 09/16/2020 at 11:09 a.m. in OKLAHOMA CITY, OK 73142. The scanned image of the recipient information is provided below.

Signature of Recipient :

CVK KW RTHL  
Andrew Arnold

Address of Recipient :

13140 N  
MacArthur

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,  
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

This USPS proof of delivery is linked to the customers mail piece information on file as shown below:

ANDREW ARNOLD  
13140 N MACARTHUR BLVD  
OKLAHOMA CITY OK 73142-3017

Customer Reference Number: C2268153.12898036