



Insurance Code, 36 O.S. § 1435.13(A) and (D).

4. Informal disposition of this matter may be made by consent order. 75 O.S. § 309(E).

#### STIPULATION OF FACTS

5. All preceding paragraphs are adopted and incorporated by reference herein, and the parties agree to and stipulate to the following findings of fact.

6. On or about January 29, 2019, the Department received a termination letter regarding Respondent from Farmers Insurance Group terminating his appointment for falsifying documents leading to a financial impact of \$18,695.00 in misapplied policy discounts related to approximately thirty-eight (38) policies from November 2014 through July 2018. The Commissioner reserves the right to present additional invoices, policies, and claims if discovered after issuance of this conditional administrative order and/or a hearing is requested by Respondent.

7. In addition to the termination letter, a list of affected policies and related invoices, Farmers Insurance also provided a signed statement by Respondent stating:

“I know the customer is responsible for providing the documentation and they should not get the discount if they cannot prove their eligibility, but in these cases I believe they had the roofs replaced so I used a prior legitimate invoice from these companies and changed the name and dates to match what the insured told me.”

8. Anti-Fraud Unit Investigator Mark Drummond (“Agent Drummond”) was assigned to the referral and interviewed the Respondent.

9. During the course of that interview, Agent Drummond presented Respondent with the invoices provided by Farmers Insurance. Respondent admitted that he had falsified invoices related to new roof policy discounts for his customers and changed the company name at the top

of the invoice with a fictional business name. Agent Drummond provided the Respondent with his signed statement regarding the falsified invoices provided by Farmers Insurance wherein Respondent admitted the allegations contained therein were true and correct.

**AGREED CONCLUSIONS OF LAW**

10. The preceding paragraphs are adopted and incorporated by reference herein, and the parties agree to and stipulate the following conclusions of law.

11. Respondent has violated *36 Okla. Stat. Ann. §§ 1435.13(A)(2) and (A)(8)* by violating regulations, orders and/or subpoenas of the Commissioner and by using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility whereby Respondent altered and/or falsified invoices and/or other documentation in such a way as to be false, fraudulent, and/or misleading.


**ORDER**

**IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED** by the Insurance Commissioner and agreed to by Respondent that Respondent's Oklahoma insurance producer license is hereby **REVOKED** and Respondent is **hereby fined TWO-THOUSAND, EIGHT HUNDRED DOLLARS**. Respondent shall make a minimum payment of Two Hundred Dollars (\$200.00) monthly until said civil fine is paid in full.

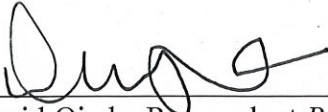
WITNESS My Hand and Official Seal this 18<sup>th</sup> day of June, 2019.



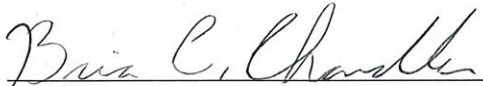
GLEN MULREADY  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA

  
Tyler Laughlin, First Deputy  
Oklahoma Insurance Department

Approved:



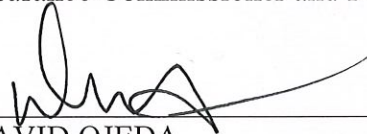
David Ojeda, Respondent *Pro Se*



Brian C. Chandler  
Assistant General Counsel  
Oklahoma Insurance Department  
*Attorney for Petitioner*

**VERIFICATION AND CONSENT**


I, David Ojeda, state that I have read this *Consent Order*. The contents and facts set forth in the order are true to the best of my knowledge. I consent to the entry of the Order by the Insurance Commissioner and I waive my right to appeal this Order.



DAVID OJEDA

STATE OF OKLAHOMA  
COUNTY OF Oklahoma

This instrument was acknowledged before me on June 11, 2019 by  
DAVID OJEDA.

  
Signature of Notarial Officer

Seal



\_\_\_\_\_  
Title

My commission expires:  
09/26/21

**CERTIFICATE OF MAILING**

I, Brian C. Chandler, hereby certify that a true and correct copy of the above and foregoing *Consent Order* was mailed by certified mail, with postage prepaid and return receipt requested on this 18 day of June, 2019, to the following:

David Ojeda



**CERTIFIED MAIL NO.** 9214 8902 0982 7500 0215 15

and that notification was sent to:

NAIC/RIRS

and to all appointing insurers

and a copy was delivered to:

Licensing Division  
Anti-Fraud Unit

A handwritten signature in blue ink that reads "Brian C. Chandler".

Brian C. Chandler  
Assistant General Counsel