

**BEFORE THE INSURANCE COMMISSIONER OF THE
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel. GLEN
MULREADY, Insurance Commissioner,

Petitioner,

v.

CHRISTOPHER BRYANT LITTLE,
a resident producer,

Respondent.

Case No. 23-0201-DIS

FILED
NOV 22 2023
INSURANCE COMMISSIONER
OKLAHOMA

**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 counsel, Antuanya "Bo" DeBose, and states as follows:

JURISDICTION

1. Glen Mulready is the Insurance Commissioner of the State of Oklahoma and, as such, is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O.S. §§ 101-7401, including the Oklahoma Producer Licensing Act, 36 O.S. § 1435.1 et seq..
2. Christopher Bryant Little ("Respondent") holding license number 3001117597, 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 [REDACTED]
3. The Insurance Commissioner has jurisdiction over the subject matter raised in this dispute and may issue penalties pursuant to 36 O.S. § 1435.13(A) and (D).
4. Pursuant to 36 O.S. § 1435.13(D), 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. The penalty may be enforced in the same manner in which civil judgments may be enforced.

5. If Respondent requests a hearing in writing in this matter, pursuant to OAC 365:1-7-1, the Insurance Commissioner, pursuant to 36 O.S. § 319, will appoint an independent hearing examiner who shall sit as a quasi-judicial officer and preside over the hearing requested by Respondent.

FINDINGS OF FACT

1. The Oklahoma Insurance Department ("OID") received a complaint from American Family Life Assurance Company ("AFLAC") alleging Respondent established four (4) accounts and wrote twenty-one (21) policies to employees of the various accounts, but submitted the business in his wife's name. OID assigned Investigator Rick Koch ("Investigator Koch") to the case.

2. AFLAC's investigation revealed Respondent established four (4) business accounts and wrote twenty-one (21) policies for employees on those accounts. Respondent then submitted the policies to AFLAC listing his wife, who is also a licensed producer, as the writing agent.

3. As a result of the twenty-one (21) submitted policies, Respondent received a \$1,000.00 bonus from AFLAC and his wife received a \$500.00 bonus for meeting AFLAC sales contest goals.

4. AFLAC contacted representatives from each of the four (4) businesses and learned Respondent was the only AFLAC representative that conducted the presentations and enrollments at each business. None of the representatives knew, or had met, Respondent's wife. However, each of the four (4) business accounts established by the Respondent were legit and the policyholders had in fact requested the policies.

5. Investigator Koch and an investigator from AFLAC both interviewed Respondent. Respondent was cooperative and admitted to establishing the four (4) business accounts without his wife's knowledge. Additionally, Respondent admitted to forging his wife's signature on the twenty-one (21) policies in question.

6. Respondent was initially terminated from AFLAC but is now reinstated and is currently writing new business. Respondent has also reimbursed AFLAC for the bonus amounts received by him and his wife.

7. Pursuant to the provisions of 36 O.S. §1435.13 (A), 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 for:

- a. Using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere.
- b. Forging another's name to an application for insurance or to any document related to an insurance transaction;

8. Pursuant to 36 O.S. §1435.13(D), 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.

CONCLUSIONS OF LAW

6. Respondent has violated 36 O.S. §1435.13(A)(8) and 36 O.S. §1435.13(A)(10) by writing twenty-one (21) policies and listing his wife as the writing agent when she in fact did not participate in the enrollment. Additionally, Respondent forged his wife's signature to twenty-one (21) policies without her knowledge.

ORDER

IT IS THEREFORE ORDERED that Respondent is **CENSURED** and **FINED** Two Thousand Dollars (\$2,000.00). The fine shall be paid within thirty (30) days of the date of this Conditional Administrative Order and made payable to the Oklahoma Insurance Department. The fine shall be sent to the Oklahoma Insurance Department located at 400 NE 50th Street, Oklahoma City, Oklahoma 73105. Failure to comply with a proper order of the Commissioner will result in further administrative action.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Insurance Commissioner that this Order is a Conditional Order. Unless the Respondent requests a hearing with respect to the Findings of Fact set forth above within thirty (30) days of the date of this Conditional Order, the penalties set forth above will become a Final Order on the 31st day following the date of mailing this Order. A request for hearing should be in writing and addressed to Antuanya "Bo" DeBose, Oklahoma Insurance Department, Legal Division, 400 NE 50th Street, Oklahoma City, Oklahoma 73105. The request for hearing must state the grounds for the request to set aside or modify the Order and must be served on the Oklahoma Insurance Department within the thirty (30) days allotted. The proceedings on such requested hearing will be conducted in accordance with the Oklahoma Insurance Code, 36 O.S. §§ 101 et seq., and the Oklahoma Administrative Procedures Act, 75 O.S. §§ 250 through 324. If the Respondent serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order will act as a notice of the matters to be reviewed at the hearing and the Findings of Fact, Conclusions of Law, and penalties imposed in this Conditional Order shall be considered withdrawn, pending final resolution at the hearing.

WITNESS My Hand and Official Seal this 22nd day of November 2023.



GLEN MULREADY
INSURANCE COMMISSIONER
STATE OF OKLAHOMA

AS DeBose

Antuanya "Bo" DeBose
Assistant General Counsel
Oklahoma Insurance Department
400 NE 50th Street
Oklahoma City, Oklahoma, 73105
Tel. (405) 522-4805
Fax (405) 522-0125
Bo.debose@oid.ok.gov

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the above and foregoing *Conditional Order* was mailed by regular mail and by certified mail, with postage prepaid and return receipt requested, on this 22nd day of November 2023, to:

Christopher Bryant Little



CERTIFIED MAIL NO:
9214 8902 0982 7500 0584 98

and a copy was delivered to:

Licensing & Anti-Fraud Division

A handwritten signature in blue ink, reading "Antuanya 'Bo' DeBose", written over a horizontal line.

Antuanya "Bo" DeBose
Assistant General Counsel