

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

**FILED**  
MAR 26 2025  
INSURANCE COMMISSIONER  
OKLAHOMA

STATE OF OKLAHOMA, ex rel. )  
GLEN MULREADY, Insurance Commissioner, )  
 )  
Petitioner, )  
v. )  
 )  
Paul F. Martini III, an applicant to reactivate )  
a resident insurance adjuster license, )  
 )  
Respondent. )

Case No. 25-0241-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 attorney, Julie Reding, 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. §§ 101–7402, including the Oklahoma Insurance Adjusters Licensing Act, 36. O.S. §§ 6201–6223.

2. Respondent Paul F. Martini, III (“Respondent”) is an applicant to reactivate his expired resident insurance adjuster license number of 111995. Respondent’s mailing 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. § 6220.

4. Pursuant to 36 O.S. § 6220 (A) and (B), in addition to or in lieu of any applicable denial, probation, censure, suspension or revocation of or refusal to issue or renew a license, the Insurance Commissioner may levy a fine up to \$1,000.00 for each violation of the Oklahoma Insurance Adjusters Licensing Act.

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.

6. Pursuant to 75 O.S. §§ 309(C) & 310(3) & (5); OAC 365:1-7-4(a)-(b), hearings are open to the public and Respondents have a right to appear in person and with counsel to present evidence, examine witnesses, and make oral arguments. OAC 365:1-1-5(a).

7. Pursuant to OAC 365:1-7-5, upon written request reasonably made by a person affected by the hearing and at such person's expense, the Insurance Commissioner shall cause a full stenographic record of the proceedings to be made by a competent court reporter.

#### **FINDINGS OF FACT**

8. On or about August 31, 2024, Respondent's resident insurance adjuster license expired.

9. On or about February 8, 2025, Respondent submitted an application to reactivate Respondent's expired adjuster license (Transaction Number 789257186).

10. On or about February 18, 2025, the Oklahoma Insurance Department Licensing Division (OID) sent an audit letter to Respondent requiring Respondent to disclose any claims Respondent had adjusted with an expired license.

11. On or about February 25, 2025, Respondent replied to OID's audit letter and acknowledged and disclosed one hundred fifty-five (155) occurrences of Respondent adjusting insurance claims in the State of Oklahoma between the dates of October 1, 2024 and February 18, 2025 while Respondent's license was expired.

12. Pursuant to 36 O.S. § 6620(A)(9), it is a violation of the Adjuster Licensing Act for any adjuster to "adjust losses or negotiate claim settlements arising pursuant to provisions of insurance contracts on behalf of an insurer or the insured party without proper licensing from the Commissioner."

13. Pursuant to 36 O.S. § 6220(A) & (B), in addition to any potential denial, censure, suspension or revocation or refusal to issue or renew a license, the Insurance Commissioner may subject any person violating the provisions of the Insurance Adjusters Licensing Act to civil fines of not more than One Thousand Dollars (\$1,000.00) for each violation.

### **CONCLUSIONS OF LAW**

14. Respondent violated 36 O.S. § 6220(A)(9) by adjusting losses or negotiating claim settlements arising pursuant to provisions of insurance contracts on behalf of an insurer or insured without proper licensing from the Insurance Commissioner when Respondent adjusted one hundred fifty-five claims (155) from October 1, 2024 to February 18, 2025 without a proper license from the Oklahoma Insurance Commissioner.

### **ORDER**

**IT IS THEREFORE ORDERED** that Respondent is hereby **CENSURED** and **FINED ONE THOUSAND FIVE HUNDRED FIFTY DOLLARS (\$1, 550.00)**. The fine shall be paid within thirty (30) days of the date of this Conditional Administrative Order. The fine must be paid



online through the Department's website on the Legal Division's homepage at <https://www.oid.ok.gov/about-oid/divisions-programs/legal-division/> by navigating to the "Pay Fees and Fines Online" tab under the "Legal Division" menu along the left-hand side of the page. Payment will include a nonrefundable processing fee of One Dollar (\$1.00), which one must agree to accept by clicking the "Accept Terms and Conditions" button. On the next screen, one will select the "Payment Type" from the drop-down menu by selecting "Legal Fines and Costs" and clicking "Continue," which will take one to a page to complete your payment. Should one experience difficulty completing one's online payment, please contact the Legal Division at (405) 521-2746 for assistance. 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 mailing of this Order, the penalties set forth above will become a Final Order on the thirty-first (31<sup>st</sup>) day following the date of mailing this Order. A request for hearing should be in writing addressed to Julie Reding, 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 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. §§ 101–7402, and the Oklahoma Administrative Procedures Act, 75 O.S. §§ 250–324. If Respondent serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order shall act as 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 26<sup>th</sup> day of March 2025.



GLEN MULREADY  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA

*Julie Reding*

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**CERTIFICATE OF MAILING**

I, Julie Reding, hereby certify that a true and correct copy of the above and foregoing **Conditional Administrative Order and Notice of Right to be Heard** was sent by regular mail, certified mail with postage prepaid and by email with a return receipt requested on this 26<sup>th</sup> day of March 2025 to:

Paul F. Martini, III  


**EMAIL: pmartini@mercuryinsurance.com**

and

that a copy was delivered to:

Licensing Division

CERTIFIED MAIL NO.  
9214 8902 0982 7500 0705 51

Onaia Torres for  
Julie Reding