

BEFORE THE INSURANCE COMMISSIONER OF THE  
STATE OF OKLAHOMA

FILED

SEP 07 2023

INSURANCE COMMISSIONER  
OKLAHOMA

STATE OF OKLAHOMA, ex rel. GLEN )  
MULREADY, Insurance Commissioner, )  
)  
Petitioner, )  
v. )  
)  
BLAKE EDWARD DEMENT, )  
a resident producer. )  
)  
Respondent. )

Case No. 23-0165-DIS

**FINAL ADMINISTRATIVE ORDER**

This matter is a disciplinary proceeding under the Oklahoma Producer Licensing Act, 36 O.S. §§ 1435.1 et seq. On July 18, 2023, a show cause hearing was held at the Oklahoma Insurance Department (“OID”) on OID’s Notice of Hearing and Order to Show Cause (“Notice”), filed April 26, 2023. The hearing was held at the offices of OID before Independent Hearing Examiner Stephan Mathis. Present at the hearing were Antuanya “Bo” DeBose, Assistant General Counsel for OID. Respondent Blake Edward Dement (“Respondent”) appeared with and through counsel Lisa G. Bays.

Witnesses were sworn and testified, exhibits were admitted, and argument of the parties heard.

**FINDINGS OF FACT**

1. That OID has jurisdiction over the subject matter of this action pursuant to 36 O.S. §§ 101-7401, including the Oklahoma Producer Licensing Act, 36 O.S. §1435.1 et seq.
2. That the Insurance Commissioner has the authority to render an Order concerning the above styled matter and has lawfully appointed Independent Hearing Examiner, Stephan Mathis, who shall sit as a quasi-judicial officer pursuant to 36 O.S. § 319.

3. Respondent holds resident producer license number 100294397. Respondent's address of record is 301 North Walker Ave, Apartment 9308, Oklahoma City, Oklahoma 73102-1878.

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 36 O.S. § 1435.13(A) and (D).

5. Petitioner afforded Respondent an opportunity for hearing by sending the *Notice* by certified mail return receipt requested and by electronic mail on April 26, 2023 to Respondent. A Continuance was also sent to the Respondent by certified mail on July 7, 2023. The *Notice* stated the matters asserted, and stated the time, place and nature of the hearing, cited legal authority and jurisdiction, and referred to particular sections of the statutes involved.

6. The hearing was recorded electronically by an employee of the Oklahoma Insurance Department.

7. The following exhibits were introduced and admitted:

- a) Petitioner's Exhibit A: Email from Gravie (O'Brien) to Sarah Schott
- b) Petitioner's Exhibit B: Cease and Desist email from Gravie to Dement 10/15/2021
- c) Petitioner's Exhibit C: Blake Dement's Business Card
- d) Petitioner's Exhibit D: Cease and Desist email from Gravie to Dement 10/31/2022
- e) Petitioner's Exhibit E: Email from Dement to Gravie 10/31/2022
- f) Petitioner's Exhibit F: State Based Systems printout showing Dement's Appointments
- g) Respondent's Exhibit 1: Email from Dement to Gravie 11/07/2022
- h) Respondent's Exhibit 2: NIPR Appointment Snapshot taken 05/01/2023

- i) Respondent's Exhibit 3: AFLAC Dividend Statement for Blake Dement
- j) Respondent's Exhibit 4: Affidavit of Geri Young
- k) Respondent's Exhibit 5: Email from Heartland Energy Solutions, LLC to Dement  
10/07/2022

8. The following witnesses were sworn and testified under oath:

- a) Sarah Schött, General Counsel for Gravie, Inc
- b) Jon Huntington, Investigator with OID
- c) Blake Edward Dement, Respondent

9. The Oklahoma Insurance Department ("OID") received a complaint from Gravie Inc. ("Gravie"), a third-party administrator for health benefits, alleging Respondent falsely represented his affiliation with Gravie and failed to cease and desist this behavior after repeated requests. (*See, Testimony of Jon Huntington*).

10. On or about October 15, 2021, Respondent went to Valir Health ("Valir") in Oklahoma City without an appointment and attempted to sell Gravie products to the company. Respondent represented himself as being affiliated with Gravie and presented a business card with the Gravie logo. Respondent became involved in a verbal altercation with Valir employees once they asked him to leave the premises. Valir then notified Gravie about the incident. (*See Testimony of Sarah Schott, Petitioner's Exhibit A, Petitioner's Exhibit C, Testimony of Jon Huntington and Testimony of Blake Edward Dement*).

11. On October 15, 2021, Gravie sent Respondent a cease-and-desist notice, asking Respondent to stop using their business logo and representing that he is affiliated with their company, as he was not authorized to do so. (*See Testimony of Sarah Schott, Petitioner's Exhibit B and Testimony of Blake Edward Dement*).



12. Despite Gravie's direction to cease and desist, Respondent continued to attempt to register for Gravie webinars, reach out to Gravie salespeople, and request information on Gravie products through Gravie's website. Gravie began to deny Respondent access to their products and staff. (See Testimony of Sarah Schott).

13. On October 27, 2022, Respondent travelled to Gravie headquarters in Minneapolis, MN without an invitation or advance notice. Respondent presented a business card with the Gravie logo and asked to speak with the head of sales for Gravie. Gravie refused Respondent's request to speak with the head of sales. Respondent then requested to speak with Gravie's human resources division or the CEO. Respondent was informed that he was not permitted to be on Gravie's premises and was asked to leave immediately. After repeated requests to leave, Respondent finally exited the building. (See Testimony of Sarah Schott, Petitioner's Exhibit C and Testimony of Jon Huntington).

14. Respondent testified he went to Gravie headquarters on October 27, 2022 to present Gravie with his client's (Heartland Energy Solutions LLC) insurance application. However, an email dated October 7, 2022 shows Heartland Energy Solutions LLC communicated to Respondent, prior to his visit to Gravie, that they decided to remain with their current carrier. (See Testimony of Blake Edward Dement and Respondent's Exhibit 5).

15. Following Respondent's visit to Gravie headquarters, Gravie sent Respondent another cease-and-desist email. (See Testimony of Sarah Schott and Petitioner's Exhibit D).

16. Respondent was interviewed and took responsibility for his actions at both Valir and Gravie. (See, Testimony of Jon Huntington and Testimony of Blake Edward Dement).

17. Respondent is not appointed with Gravie or authorized to sell Gravie products. Respondent has never been authorized or appointed to sell Gravie products. (*See Testimony of Sarah Schott*).

18. Respondent also had the logos of other companies on his business card that he is not appointed with, including Humana, Mutual of Omaha, AFLAC, and Aetna. (*See Testimony of Jon Huntington*).

19. Respondent's resident producer license is set to expire April 30, 2023. Respondent submitted a renewal application April 4, 2023. (*See Testimony of Jon Huntington*)

#### **CONCLUSIONS OF LAW**

20. That OID has jurisdiction over this matter and Respondent pursuant to 36 O.S. § 1435.1 et seq.

21. That Respondent is licensed by the OID as a resident producer pursuant to 36 O.S. § 1435.1 et seq.

22. That Respondent was provided adequate notice and a hearing pertaining to the Notice of Hearing and Order to Show Cause filed on April 26, 2023 and the Continuance filed July 7, 2023 in accordance with the Oklahoma Insurance Code and the Oklahoma Administrative Procedures Act.

23. Based upon the above provided findings of fact there is clear and convincing evidence to find that Respondent violated the following:

- a. 36 O.S. §1204(2), 36 O.S. §1435.13(A)(7), and 36 O.S. §1435.13(A)(8) by falsely representing his affiliation with Gravie and other companies, and by failing to cease and desist this behavior after repeated requests.

24. 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. 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, also 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.

**ORDER**

**IT IS THEREFORE ORDERED** that Blake Edward Dement's resident insurance producer license number 100294397 is hereby **REVOKED**. Respondent is ordered to pay the costs of the proceeding in the amount of Two Hundred Fifty Dollars (**\$250.00**) and is fined Two Thousand Dollars (**\$2,000.00**). The Insurance Commissioner shall notify all appointing insurers of Respondent's revocation and shall notify the Central Office the National Association of Insurance Commissioners of Respondent's revocation.

Done this 6<sup>th</sup> day of September, 2023.



  
Stephan Mathis  
INDEPENDENT HEARING EXAMINER  
OKLAHOMA INSURANCE DEPARTMENT



**CERTIFICATE OF MAILING**

I, Antuanya "Bo" DeBose, hereby certify that a true and correct copy of the above and foregoing Final Administrative Order was mailed by first class U.S. Mail and by certified mail with postage prepaid and return receipt requested on this 7<sup>th</sup> day of September 2023.to:

Lisa G. Bays  
1224 SW 104<sup>th</sup> Street, Suite A  
Oklahoma City, Oklahoma 73139  
[debbie@selflegalgroup.com](mailto:debbie@selflegalgroup.com)

**CERTIFIED MAIL NO:**  
**7017 1070 0001 1036 8521**

Blake Edward Dement  
301 N. Walker Ave. Apartment 9308  
Oklahoma City, Oklahoma 73102  
[blakedement@cox.net](mailto:blakedement@cox.net)  
[blakedement@me.com](mailto:blakedement@me.com)

**CERTIFIED MAIL NO:**  
**7017 1070 0001 1036 8538**

and that a copy was delivered to: Licensing and Anti-Fraud Division

  
Antuanya "Bo" DeBose