

BEFORE THE INSURANCE COMMISSIONER OF THE  
STATE OF OKLAHOMA

**FILED**  
DEC 1 2 2023  
INSURANCE COMMISSIONER  
OKLAHOMA

STATE OF OKLA., <i>ex rel.</i> GLEN )	)	
MULREADY, <i>Ins. Comm'r,</i>	)	
	)	
<i>Petitioner,</i>	)	
	)	
vs.	)	
	)	
NAT'L SOC. OF DENTAL )	)	
PRACTITIONERS, INC., <i>a nonresident</i> )	)	
<i>registered purchasing group,</i>	)	
	)	
<i>Respondent.</i>	)	

Case No. 23-0196-DIS

**CONSENT ORDER**

Petitioner the State of Oklahoma, *ex rel.* Glen Mulready, Insurance Commissioner (“Commissioner”) and Respondent National Society of Dental Practitioners, Inc. (“Respondent”) agree to the entry of this Consent Order and, further, agree, stipulate, and consent as follows:

**JURISDICTION**

1. Glen Mulready is the Insurance Commissioner of the State of Oklahoma and is charged with administering and enforcing all provisions of the Oklahoma Risk Retention Act (the “Act”), OKLA. STAT. tit. 36, §§ 6451, *et seq.*, and has jurisdiction over this matter. 36 O.S. § 6460; OAC § 365:1-1-3.

2. Respondent was formerly registered as a nonresident purchasing group in the State of Oklahoma with registration number 44198778.

3. The Commissioner has both subject matter and personal jurisdiction in this matter and may issue administrative penalties. 36 O.S. §§ 6460 & 6461.

4. The Parties may agree, and have agreed, to informally resolve this matter by consent order. 75 O.S. § 309(E).

## FINDINGS OF FACT

3. Respondent was formerly registered in Oklahoma as a nonresident purchasing group with registration number 44198778, which expired on December 31, 2022.

4. On January 31, 2023, Respondent submitted a renewal application a month after its registration had expired.

5. On February 27, 2023, Respondent's Vice President of Compliance, Stephanie Owens, wrote the Oklahoma Insurance Department's ("Department's") Regulated Industries Services Division ("RIS") confirming that Respondent, inadvertently, failed to renew its registration on or before December 31, 2022.

6. Purchasing groups must renew their registrations annually. *See*, 36 O.S. § 6465.

7. Respondent, also, submitted an Activity Attestation affidavit disclosing that it conducted business from December 31, 2022, until January 31, 2023, while its registration was expired, issuing 13 policies on behalf of clients, and producing Fifteen Thousand Seven Hundred and Sixty Dollars and No Cents (\$15,760.00) in policy premiums.

8. The Act requires a purchasing group, which intends to do business in Oklahoma, to register prior to doing business. *See*, 36 O.S. § 6458(A).

9. On July 26, 2023, the Commissioner issued a Conditional Administrative Order and Notice of Right to Be Heard citing Respondent for various violations of the Act and imposing administrative penalties in the amount of Seven Thousand Five Hundred Dollars and No Cents (\$7,500.00).

10. Respondent did not request a hearing, and the Conditional Order became a Final Administrative Order on August 26, 2023.

11. Thereafter, Respondent contacted RIS inquiring about its licensure status, the Conditional Order, and a means of resolving the issues.

12. Respondent worked directly with the Department's RIS and Legal Division to address the issues, come into compliance, and negotiate a reduced penalty.

13. Respondent failed to file its 2023 registration renewal by December 31, 2022.

14. Respondent conducted business while unregistered from December 31, 2022, until January 31, 2023.

### CONCLUSIONS OF LAW

15. Respondent violated the Act, OKLA. STAT. tit. 36, § 6465, by failing to renew its registration on or before December 31, 2022.

16. Respondent violated the Act, OKLA. STAT. tit. 36, § 6462(A), by soliciting, negotiating, or procuring insurance in Oklahoma for its members while unregistered.

17. The Commissioner may refuse to register, suspend, or revoke the registration, or impose administrative fines of up to One Thousand Dollars (\$1,000.00) if he finds that the registrant has violated any provisions of the Act. 36 O.S. § 6461(C); OAC 365:25-30-4.

### AGREED ORDER

**IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED** by the Commissioner and agreed to by Respondent that it shall pay an **ADMINISTRATIVE PENALTY** in the amount of **ONE THOUSAND DOLLARS AND NO CENTS (\$1,000.00)** within thirty (30) days of this Consent Order, a penalty of Five Hundred Dollars and No Cents (\$500.00) for each of its two (2) violations of the Act.

**IT IS ORDERED, ADJUDGED, AND DECREED** by the Commissioner and agreed to by Respondent that the Conditional Order filed in this matter on July 26, 2023, which became a Final Administrative Order on August 26, 2023, are, hereby, **WITHDRAWN**.



**IT IS ORDERED, ADJUDGED, AND DECREED** by the Commissioner and agreed to by Respondent that this Consent Order is a **FINAL ADMINISTRATIVE ORDER** by adopting the Findings of Fact, Conclusions of Law, and penalties imposed herein as **FINAL**.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** by the Commissioner and agreed to by Respondent that it **WAIVES** its right to a Hearing, of its own free and voluntary act, relying solely upon the advice of counsel of its own choosing and with full knowledge of its right to personally appear before an administrative law judge to present evidence, whether written or verbal, on its own behalf and in its defense.

WITNESS My Hand and Official Seal this 8<sup>th</sup> day of December 2023.



**GLEN MULREADY**  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA

A handwritten signature in black ink, appearing to read "Brian Downs", written over a horizontal line.

**BRIAN DOWNS**  
FIRST DEPUTY INSURANCE COMMISSIONER  
AND CHIEF OF STAFF

**AGREED AS TO CONTENT AND FORM:**

*michael loughran*

12/12/2023

MICHAEL LOUGHRAN, Vice President  
NATIONAL SOCIETY OF  
DENTAL PRACTITIONERS, INC.  
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Chicago, IL 60601  
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Email: [michael.loughran@aon.com](mailto:michael.loughran@aon.com)

*Representative of Respondent,  
Nat'l Soc. of Dental Practitioners, Inc.*

A handwritten signature in blue ink, appearing to read "Seth D. Coldiron", written over a horizontal line.

SETH D. COLDIRON (OBA #20041)  
ASSISTANT GENERAL COUNSEL  
OKLAHOMA INSURANCE DEPARTMENT  
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*Attorney for Petitioner,  
State of Okla., ex rel., Glen Mulready, Ins.  
Comm'r*

**CERTIFICATE OF MAILING**

I hereby certify that a true and correct copy of the above and foregoing sent by *certified mail* with postage prepaid and return receipt requested on December 12, 2023 to:

Michael Loughran, V.P.  
NATIONAL SOCIETY OF  
DENTAL PRACTITIONERS, INC.  
200 E. Randolph St., 4th Floor  
Chicago, IL 60601

*Copy delivered to:*

Regulated Indus. Serv. Div.

*Representative of Respondent,  
Nat'l Soc. of Dental Practitioners, Inc.*



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**CERTIFIED MAIL NO:  
9214 8902 0982 7500 0588 63**

SETH D. COLDIRON