

**STATE OF ARIZONA**

**DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS**

**In the Matter of:**

**ERIC JAMES SNYDER,**

**and**

**OFFICES OF ERIC J. SNYDER, LLC**

**Petitioners.**

**No. 21A-087-INS**

**ORDER**

On February 8, 2022, the Office of Administrative Hearings, through Administrative Law Judge Kay A. Abramsohn, issued an Administrative Law Judge Decision (“Recommended Decision”). The Director of the Arizona Department of Insurance and Financial Institutions (“Director”) received the Recommended Decision on the same date, a copy of which is attached and incorporated by reference. The Director has reviewed the Recommended Decision and enters the following:

1. The Director ADOPTS the Recommended Findings of Fact.
2. The Director ADOPTS the Recommended Conclusions of Law.
3. The Director ADOPTS the Recommended Order and ORDERS that:
  - a. The Department’s denial of Eric James Snyder’s Arizona resident insurance adjuster license application is affirmed.
  - b. The Department’s denial of Offices of Eric J. Snyder, LLC’s Arizona business entity insurance adjuster license application is affirmed.

**NOTIFICATION OF RIGHTS**

Pursuant to Arizona Revised Statutes (“A.R.S.”) § 41-1092.09, Respondent may request a rehearing or review with respect to this Order by filing a written motion with the

1 Director within 30 days after the date of this Order, setting forth the basis for relief under  
2 Arizona Administrative Code R20-6-114(B). Pursuant to A.R.S. § 41-1092.09, it is not  
3 necessary to request a rehearing before filing an appeal to the Superior Court.

4 Respondent may appeal the final decision of the Director to the Superior Court of  
5 Maricopa County for judicial review, pursuant to A.R.S. § 20-166. A party filing an appeal  
6 must notify the Office of Administrative Hearings of the appeal within ten days after filing the  
7 complaint commencing the appeal, pursuant A.R.S. § 12-904(B).

8 DATED and EFFECTIVE this 22nd day of February, 2022.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26



---

Evan G. Daniels, Director  
Arizona Department of Insurance and  
Financial Institutions

1 **COPY** of the foregoing electronically transmitted  
this **23rd** day of **February**, 2022, to:

2 Kay A. Abramsohn, Administrative Law Judge  
3 Office of Administrative Hearings  
4 <https://portal.azoah.com/submission>

5 **COPY** of the foregoing mailed by U.S. Certified Mail,  
6 Electronic Receipt Requested, same date to:

7 Eric James Snyder  
3915 East Blue Spruce Lane 9489 0090 0027 6139 7889 83  
8 Gilbert, AZ 85298  
9 Petitioner

10 Offices of Eric J. Snyder, LLC  
3915 East Blue Spruce Lane  
11 Gilbert, AZ 85298 9489 0090 0027 6139 7889 90  
12 Petitioner

13 **COPY** of the foregoing electronically delivered same date to:

14 Deian Ousounov, Assistant Director  
15 Catherine O’Neil, Consumer Legal Affairs Officer  
16 Ana Starcevic, Paralegal Project Specialist  
17 Steven Fromholtz, Division Manager  
18 Aqueelah Currie, Licensing Supervisor  
19 Linda Lutz, Legal Assistant  
Arizona Department of Insurance and Financial Institutions  
100 North 15th Avenue, Suite 261  
Phoenix, Arizona 85007

20 **COPY** sent same date via electronic mail to:

21 Eric J. Snyder  
[ericjamesnyder@gmail.com](mailto:ericjamesnyder@gmail.com)  
22 Petitioner

23 Offices of Eric J. Snyder, LLC  
24 [eric@ericjsnyderllc.com](mailto:eric@ericjsnyderllc.com)  
25 Petitioner

26 Holly Wan, Assistant Attorney General  
[Holly.Wan@azag.gov](mailto:Holly.Wan@azag.gov)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

[AdminLaw@azag.gov](mailto:AdminLaw@azag.gov)  
Attorney for the Arizona Department of Insurance and Financial Institutions

*Ana Starcevic*  
\_\_\_\_\_

IN THE OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of:

No. 21A-087-INS

Eric James Snyder  
and  
Offices of Eric J. Snyder, LLC  
Petitioners.

ADMINISTRATIVE LAW JUDGE  
DECISION

**HEARING:** January 4, 2022 and January 13, 2022.

**APPEARANCES:** Eric Snyder represented himself. Assistant Attorney General Holly Wan represented the Arizona Department of Insurance and Financial Institutions, Insurance Licensing.

**ADMINISTRATIVE LAW JUDGE:** Kay A. Abramsohn

**FINDINGS OF FACT**

**CURRENT APPLICATION**

1. On October 30, 2021, Eric James Snyder ("Snyder") submitted an application ("License Application") to the Department for an Arizona Resident insurance adjuster license through the National Insurance Producer Registry ("NIPR").<sup>1</sup>

2. On the License Application, Snyder answered "Yes" to the following question:

(1A) Have you ever been convicted of a misdemeanor, had a judgment withheld or deferred, or are you currently charged with committing a misdemeanor?

3. Snyder provided written statements<sup>2</sup> and identified the following two misdemeanor convictions:

- a. CR2019-005425-001, Unsworn Falsification<sup>3</sup>
- b. CR2021-007059-001, Criminal Possession of Forgery Device<sup>4</sup>

<sup>1</sup> See Exhibit A; see also Exhibit 8.

<sup>2</sup> See Exhibit D; see also Exhibit 10.

<sup>3</sup> See Exhibit J.

<sup>4</sup> See Exhibit I; see also Exhibit 11.

1           4.     On October 30, 2021, Snyder also submitted a license application for the  
2 Business (“Business Application”). Snyder listed himself as the “owner/adjuster” on the  
3 Business Application.<sup>5</sup>

4           5.     On the Business Application, Snyder answered “Yes” to the following  
5 question:

6  
7                   (1A) Has the business entity or any owner, partner, officer or  
8 director of the business entity, or member or manager of a  
9 limited liability company, ever been convicted of a  
10 misdemeanor, had a judgment withheld or deferred or is the  
11 business entity or any owner, partner, officer or director of the  
business entity, or member or manager currently charged  
with, committing a misdemeanor?

12           6.     On November 5, 2021, the Department denied Snyder’s application for an  
13 Arizona Resident adjuster license and the application for the Business license.<sup>6</sup> The  
14 bases for the Department’s denial were the following:<sup>7</sup>

15                   (a) A.R.S. § 20-295(A)(1), providing incorrect, misleading,  
16 incomplete or materially untrue information in the license  
17 application;

18                   (b) A.R.S. § 20-295(A)(2) violation of any provision of Title 20,  
19 or any rule, subpoena or order of the Director; and

20                   (c) A.R.S. § 20-295(A)(3) obtaining or attempting to obtain a  
21 license through misrepresentation or fraud.

22           7.     On November 5, 2021, Snyder timely appealed the Department’s denial.<sup>8</sup>  
23 Regarding the matter, Snyder argued that the allegation of false or fraudulent  
24 documentation in the 2017 “application process” was “not correct nor true...” Snyder  
25 further noted:

26                   [this] was proven in court ... after 2+ years in court to keep my  
27 current AZ adjuster license eligible for renewal and to keep

28 <sup>5</sup> See Exhibit B.

29 <sup>6</sup> See Exhibits K and L, respectively; see also Exhibits 12 and 13, respectively.

30 <sup>7</sup> A fourth allegation, regarding A.R.S. § 20-295(A)(8), was not pursued at hearing.

<sup>8</sup> See Exhibit M.

1 me eligible for a new business adjuster license for my LLC in  
2 Arizona. All felony and fraud charges were dropped and/or  
3 dismissed.

### 4 PREVIOUS APPLICATION AND BACKGROUND

5 8. On November 6, 2017, Snyder applied for an Arizona non-resident  
6 adjuster license through NIPR.<sup>9</sup>

7 9. At that time, Snyder was licensed in Texas by the Texas Department of  
8 Insurance as an adjuster.<sup>10</sup> Snyder worked for United Services Automobile Association  
9 (“USAA”), which had its own licensing department that handled any and all of the  
10 licensures Snyder held under the USAA employment.

11 10. Based on the NIPR application, on November 6, 2017, the Department  
12 issued to Snyder an Arizona Non-resident adjuster license through reciprocity.<sup>11</sup> See  
13 *generally*, A.R.S. § 20-321.02. That 2017 license was set to expire on 10/31/2021.

14 11. Due to his existing Texas licensure, Snyder’s Arizona non-resident license  
15 was limited to the same lines of authority as his resident Texas license, pursuant to A.R.S  
16 § 20-287(C)(2).<sup>12</sup>

17 12. On November 6, 2017, Snyder began a series of email communications  
18 with the Department.<sup>13</sup> Essentially Snyder wanted to have the issued Arizona Non-  
19 resident license simply changed to an Arizona Resident license, advancing the argument  
20  
21  
22

23 <sup>9</sup> During email communication with the Department, Snyder indicated to the Department that technical  
24 personnel at NIPR were looking into the NIPR system error. However, NIPR provided to the Department  
25 documentation that Snyder, in making his NIPR application, had accessed the link for a Non-resident  
license instead of the link for a Resident license. See Exhibit N at 16.

26 <sup>10</sup> See Exhibit 5 and 6. In his efforts to rectify the situation, Snyder was in contact with Texas officials  
regarding his Texas licensure. Despite already having been advised that the Department was not able to  
27 “convert” the issued Arizona license, Snyder continued to maintain that he should be able “to flip” his  
Arizona non-resident license to a resident license. See Exhibit 6.

28 <sup>11</sup> See Exhibit C.

29 <sup>12</sup> However, on November 28, 2017, Snyder voluntarily surrendered his Texas license; in the absence of  
a Texas resident licensure, the Arizona Non-resident licensure was effectively negated.

30 <sup>13</sup> See Exhibit E.

1 that he had applied for a Resident license and that NIPR had made a mistake with regard  
2 to the application.

3 13. On November 7, 2017, Snyder inquired of the Department regarding  
4 Arizona non-resident licenses being restricted to certain lines of authority.

5  
6 14. The Department responded to Snyder indicating that to hold an unrestricted,  
7 Non-resident adjuster license in Arizona, a person had to have taken and passed the  
8 required Arizona exam. See A.R.S. § 20-321.01(C)(3).

9  
10 15. On November 7, 2017, in another email to the Department, Snyder stated  
11 that he did take the Arizona exam and he also submitted an Examination Score Report  
12 (“Report”) that indicated a 73% score and a “Pass” grade.<sup>14</sup> The following information  
13 appears at the bottom of the Report:

14 Re-examination instructions: Candidates wishing to retake  
15 this examination must re-register and remit another full  
16 examination fee. Exam registration information may be found  
17 in the Licensing Information Bulletin.

18  
19 16. On November 7, 2017, the Department reviewed the submitted test result  
20 page and compared the submitted test results with records obtained directly from the test  
21 provider, Prometric.<sup>15</sup> Prometric provided examination information documenting that the  
22 total percentage obtained on Snyder’s October 6, 2017 examination was 68%.  
23 Additionally, Prometric noted that, if he had passed the examination, the information at  
24 the bottom of the Report would have directed him regarding completing the licensing  
25 process.

26  
27 17. Based on its review of the documentation, the Department determined that  
28 Snyder had forged and altered the Report he submitted on November 7, 2017 purportedly  
29 showing he had passed the Arizona exam.

30  

---

<sup>14</sup> See Exhibit E-1.

<sup>15</sup> See Exhibit F.



1           18. Based on the forged test result page, the Department referred the matter to  
2 its Fraud Unit for further investigation.

3  
4           19. Regarding the 2017 NIPR application, Snyder maintained that he had  
5 applied for an (Arizona) Resident license and that the NIPR system erroneously  
6 “selected” a Non-resident license application.<sup>16</sup>

7           20. After being advised by the Department that he would need to submit another  
8 application and pay the application fees to obtain an Arizona Resident license, Snyder  
9 pushed the Department to change the licensure so that he would not have to pay  
10 additional fees; Snyder queried whether the fees could simply be transferable “[s]ince this  
11 was just a mistake done yesterday?”<sup>17</sup>

12           21. In December of 2017, Snyder pursued obtaining NIPR verification of an  
13 NIPR error for consideration by the Department regarding the licensure after again being  
14 advised by the Department that it could not “convert” the license and that Snyder would  
15 need to submit a new Resident application.<sup>18</sup>

16           22. In a December 6, 2017 comment back to NIPR (who had advised Snyder  
17 that he had paid for a non-resident license) Snyder maintained that he had not “paid” for  
18 a non-resident license but had paid for a Resident license, adding the following comment:

19                   Your system did not allow me to purchase it[,] it was going to  
20 be corrected by a manager but they needed the release letter  
21 from Texas to correct the error.<sup>19</sup> I now provided NIPR with  
22 [t]he letter for management to correct the letter and the system  
23 error that was confirmed by a previous manager only days and  
24 weeks ago.<sup>20</sup>

24 <sup>16</sup> See Exhibit N at 13-17, 16.

25 <sup>17</sup> See Exhibit N at 5.

26 <sup>18</sup> See Exhibit N at 2-3.

27 <sup>19</sup> The hearing record demonstrated that a person may only have one “resident” license. Mr. Fromholtz  
28 testified regarding the “business rules” under which NIPR takes applications and, because Snyder was  
29 licensed in Texas in 2017 with a resident license, he would not be able to obtain an Arizona “resident”  
30 license at the same time that he held an active Texas resident license; according to the record, the Texas  
license would have needed to be changed to a non-resident license, or be released by Texas, or be  
surrendered by Snyder prior Snyder being eligible for, and applying for an Arizona resident license. See  
Exhibit O at 1 (#6) and attachment A.

<sup>20</sup> See Exhibit N at 13-14.

1 **CRIMINAL CONVICTION**

2 23. On July 9, 2019, following investigation, Snyder was indicted on Count 1:  
3 Fraudulent Schemes and Practices in Maricopa County Superior Court, Case No.  
4 CR2019-005425-001.<sup>21</sup> Snyder was also indicted on Counts 2 and 3: Forgery. The  
5 forgery charges were not directly related to the forged test results; however, they involved  
6 forged insurance claims Snyder submitted to Geico Insurance.

7 24. On August 5, 2021, Snyder signed a plea agreement.<sup>22</sup> Snyder agreed to  
8 Count 1 (amended): Unsworn Falsification, a class 2 misdemeanor, in violation of A.R.S.  
9 § 13-2704. Counts 2 and 3 were dismissed.<sup>23</sup> The factual basis for Count 1 of the plea  
10 agreement stated, in pertinent part:

11 On November 7, 2017, [Snyder] knowingly made a statement  
12 that he believed to be false and material to the Stephen  
13 Fromholtz, Assistant Director at the Arizona Department of  
14 Insurance, regarding his independent adjuster's license.

15 25. The plea agreement also stipulated that Snyder pay restitution to Geico  
16 Insurance in the amount of \$2,577.21, and to the Department, in the amount of \$1,687.50  
17 for investigative costs.<sup>24</sup>

18 26. On October 8, 2021, the Court accepted the plea agreement and entered a  
19 guilty judgment against Snyder for Count 1 (as amended): Unsworn Falsification [on  
20 application], a class 2 misdemeanor, in violation of A.R.S. § 13-2704.

21 27. Snyder was ordered to unsupervised probation for a term of 12 months  
22 beginning October 7, 2021, and restitution in the total amount of \$4,264.71.

23 28. Although Snyder acknowledged that he falsified the Report he submitted to  
24 the Department on November 7, 2017, Snyder's basic position is that the current denial  
25 is not proper because the submittal of the falsified Report in November of 2017 was not

26 <sup>21</sup> See Exhibit G. The Fraud Unit's investigation resulted in additional charges related to forged insurance  
27 claims Snyder submitted to Geico Insurance.

28 <sup>22</sup> See Exhibit H.

29 <sup>23</sup> While the prosecutor dismissed Counts 2 and 3, Snyder was ordered to pay restitution to Geico  
Insurance to compensate the company for the economic loss he caused in submitting forged claims.

30 <sup>24</sup> See Exhibit H.

1 during an “application process” for the reason that the NIPR application process was  
2 already over and the Department had already issued the November 2017 license.<sup>25</sup> While  
3 there were multiple other explanations and arguments Snyder offered in regard to the  
4 history of this matter, as explanations for the entire background, the issue for Snyder  
5 always circled back to his position that he had not violated the statutes because the false  
6 report submittal was not during an “application process.” An additional argument Snyder  
7 advanced was that the falsified submittal was a part of a “private” communication with  
8 Ms. Fromholtz and not a part of an application process.<sup>26</sup>

9 29. Finally, Snyder posited that he had not been aware that the 2017 surrender  
10 of his then-existing Texas licensure essentially negated the Arizona Non-resident  
11 licensure, but that during the past 4 years the Department had not received any  
12 complaints about his work and practice.

13 30. On October 29, 2021, Snyder took the Arizona examination and received a  
14 passing score of 72%.<sup>27</sup>

15 31. The Department’s position is that the documented record of Snyder’s  
16 proven lies and deception with regard to the licensure process both in 2017 and in this  
17 appeal in 2021, along with his continued efforts to minimize the issues associated with  
18 falsification and obfuscation, demonstrate that he likely cannot be regulated in a manner  
19 that would protect the public. The Department argued that they have demonstrated the  
20 statutory violations of A.R.S. § 20-295(A)(1), providing incorrect, misleading, incomplete  
21 or materially untrue information in the license application; A.R.S. § 20-295(A)(2), violation  
22 of any provision of Title 20, or any rule, subpoena or order of the Director; and A.R.S. §  
23 20-295(A)(3), obtaining or attempting to obtain a license through misrepresentation or  
24 fraud.

## 25 CONCLUSIONS OF LAW

26  
27 <sup>25</sup> See Exhibit 15.

28 <sup>26</sup> Given that the false submittal was made directly to a departmental employee as a part of Snyder’s  
29 efforts to have the Department change his Arizona licensure, *i.e.*, as a part of licensure issuance and  
regulation, Snyder’s argument is quite simply disingenuous.

30 <sup>27</sup> See Exhibit 14.



1 Snyder, LLC's Arizona business entity license is upheld and Petitioners' appeal is  
2 dismissed.

3 *In the event of certification of the Administrative Law Judge Decision by the Director of*  
4 *the Office of Administrative Hearings, the effective date of the Order will be five days*  
5 *after the date of that certification.*

6 Done this day, February 8, 2022.

7 /s/ Kay Abramsohn  
8 Administrative Law Judge

9  
10  
11 Transmitted electronically to:

12  
13 Evan G. Daniels,  
14 Department of Insurance and Financial Institutions - Insurance  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30