

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED June 12, 2025 by AS

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of:

No. 25A-064- INS

MICHAEL WAHL

CONSENT ORDER

(National Producer Number 21554232)

Petitioner.

The Arizona Department of Insurance and Financial Institutions (“Department”) has received evidence that Michael Wahl (“Petitioner”) violated provisions of Arizona Revised Statutes (“A.R.S.”) Title 20. Petitioner wishes to resolve this matter without the commencement of formal proceedings, and admits the following Findings of Fact are true, and consents to the entry of the following Conclusions of Law and Order.

FINDINGS OF FACT

1. On or about April 11, 2025, Petitioner submitted to the Department an application for an Arizona resident insurance producer license through the National Insurance Producer Registry (the “Application”).

2. While completing the Application, under Background Questions, Petitioner answered “No” to the following questions, quoted in part, 1(A) “[h]ave you ever been convicted of a misdemeanor, had a judgment withheld or deferred, or are you currently charged with committing a misdemeanor?” or 1(B) “[h]ave you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony?”

1 3. Petitioner answered “Yes” to the Attestation section of the Application.

2 4. Petitioner’s criminal background check revealed that:

3 • On or about July 10, 2003, in the Superior Court of Arizona, Maricopa
4 County, Case No. CR2003-033079-001, Petitioner pleaded guilty to
5 disorderly conduct, a misdemeanor.

6 • On or about May 9, 2005, in the Superior Court of Arizona, Maricopa
7 County, Case No. CR2004-042-168-001, Petitioner was found guilty of
8 aggravated DUI, a Class 4 felony.

9 5. On or about April 28, 2025, the Department sent a letter to Petitioner
10 notifying him, in part, that the Department has received evidence of another state’s
11 insurance department indicating that he answered Background Questions 1(A) and 1(B)
12 incorrectly.¹

13 6. In the April 28, 2025 letter, Wahl was also informed in of the following
14 options:

- 15 • Withdraw the incorrect application and submit a new application with the
- 16 correct response to question 1A and/or 1B of the Background Questions
- 17 or;
- 18 • Proceed with the current application, which may result in the denial of the
- 19 application. He would also be required to provide a statement and court
- 20 documents regarding the criminal charge and conviction.

21 ¹ The April 28 letter, however, incorrectly stated that the evidence was from “another state’s
22 insurance department” rather than that the evidence of criminal convictions was from
 Petitioner’s criminal background check.

1 7. On or about May 5, 2025, Petitioner responded to the Department's letter via
2 email and stated, "I am going with option B or number #2 Proceed with the current
3 application. I do not understand why I received this letter in the first place since again I
4 have never lived anywhere else other than Arizona so to say another state says I answered
5 any question false is confusing to me especially that one since I do not have any felonies on
6 my record."

7 8. On or about May 8, 2025, the Department denied Petitioner's license
8 application due to providing incorrect information on his license application.

9 9. On or about May 13, 2025, Petitioner appealed the license denial and
10 subsequently requested an informal settlement conference.

11 10. On or about May 21, 2025, Petitioner submitted to the Department another
12 application for an Arizona resident insurance producer license through the National
13 Insurance Producer Registry.

14 11. While completing the Application, under Background Questions, Petitioner
15 again answered "No" to the following questions, quoted in part, (1A) "[h]ave you ever been
16 convicted of a misdemeanor, had a judgment withheld or deferred, or are you currently
17 charged with committing a misdemeanor?" or 1(B) "[h]ave you ever been convicted of a
18 felony, had a judgment withheld or deferred, or are you currently charged with committing
19 a felony?"

20 12. On or about May 21, 2025, the Department denied Petitioner's license
21 application due to providing incorrect information on his license application.

4 14. The settlement conference was held on June 4, 2025, during which the parties
5 agreed to a settlement.

6 CONCLUSIONS OF LAW

7 || 15. The Director has jurisdiction over this matter.

16. Petitioner's conduct, as described above, constitutes a violation of Title 20 or any rule, subpoena or order of the Director. A.R.S. § 20-295(A)(2).

10 17. Petitioner's conduct, as described above, constitutes providing incorrect and
11 incomplete information in the license application. A.R.S. § 20-295(A)(1).

12 18. Grounds exist for the Director to deny Petitioner's insurance producer license.
13 A.R.S. § 20-295(A).

14 19. Grounds exist, in addition to or instead of any suspension or revocation for the
15 Director to impose a civil penalty of not more than \$250.00 for each unintentional failure or
16 violation up to an aggregate civil penalty of \$2,500.00, or impose a civil penalty of not more
17 than \$2,500.00 for each intentional failure or violation, up to an aggregate civil penalty of
18 \$15,000.00. A.R.S. § 20-295(F).

ORDER

IT IS HEREBY ORDERED THAT:

Michael Wahl shall immediately pay to the Department a civil money penalty in the amount of one hundred fifty dollars (150.00).

Effective this ¹²_____ day of ^{June}_____, 2025.

Maria Ailor

Maria Ailor, Interim Director
Arizona Department of Insurance and Financial Institutions

CONSENT TO ORDER

1
2 1. Petitioner acknowledges that it has been served with a copy of the foregoing
3 Consent Order in the above-referenced matter, has read it, is aware of its right to an
4 administrative hearing in this matter and has knowingly and voluntarily waived that right.

5 2. Petitioner accepts the personal and subject matter jurisdiction of the
6 Department over it in this matter.

7 3. Petitioner acknowledges that no promise of any kind or nature has been made
8 to induce it to sign the Consent to Order and it has done so knowingly and voluntarily.

9 4. Petitioner acknowledges and agrees that the acceptance of this Consent to
10 Order by the Director is solely to settle this matter and does not preclude the Department
11 from instituting other proceedings as may be appropriate now or in the future. Furthermore,
12 and notwithstanding any language in this Consent Order, this Consent Order does not
13 preclude in any way any other state agency or officer or political subdivision of this state
14 from instituting proceedings, investigating claims, or taking legal action as may be
15 appropriate now or in the future relating to this matter or other matters concerning
16 Petitioner, including but not limited to violations of Arizona's Consumer Fraud Act.
17 Petitioner acknowledges that, other than with respect to the Department, this Consent Order
18 makes no representations, implied or otherwise, about the views or intended actions of any
19 other state agency or officer or political subdivision of the state relating to this matter or
20 other matters concerning Petitioner.

21 5. Petitioner acknowledges and agrees that failure to correct the violations set
22 forth above in this Consent Order, or any repeat findings of the above violations in the

future, can result in disciplinary action which may include a greater civil money penalty and suspension or revocation of its license.

6. Petitioner waives all rights to seek an administrative or judicial review or otherwise to challenge or contest the validity of this Consent Order and its accompanying parts before any court of competent jurisdiction.

7. Petitioner acknowledges that this Consent Order is an administrative action that the Department will report to the National Association of Insurance Commissioners (NAIC). Petitioner further acknowledges that it must report this administrative action to any and all states in which Petitioner holds an insurance license and must disclose this administrative action on any license application.

6/10/2025

DATE

Michael Wahl

MICHAEL WAHL

(NATIONAL PRODUCER NUMBER 21554232)

1 **COPY** of the foregoing delivered via email
2 this 12th day of June, 2025, to:

3 Emily S. Morgan, Esq
4 emorgan@doylelawgroup.com
5 Attorney for Petitioner

6 **COPY** of the foregoing delivered/mailed same date, to:

7 Deian Ousounov, Chief Financial Deputy Director
8 Alena Caravetta, Regulatory Legal Affairs Officer
9 Ana Starcevic, Project Specialist
10 Catherine O'Neil, Consumer Regulatory Affairs Officer
11 Steven Fromholtz, Division Manager, Licensing
12 Linda Lutz, Legal Assistant, Licensing
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14 Arizona Department of Insurance and Financial Institutions
15 100 North 15th Avenue, Suite 261
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Ana Starcevic