

BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF)	Division Case No. 120696
)	
WILL D.M. MAJOR)	ORDER AND CONSENT TO ORDER
NPN 19013320,)	
DOB 07/29/XXXX,)	
)	
Respondent.)	

NOW THEREFORE, upon motion of the Iowa Insurance Division (“Division”) and by consent of Respondent Will D.M. Major (“Major”), and pursuant to the provisions of Iowa Code chapters 507B—Insurance Trade Practices, and 522B—Licensing of Insurance Producers, the Commissioner enters the following Order and Consent to Order (“Consent Order”):

I. PARTIES AND JURISDICTION

1. The Commissioner of Insurance, Douglas M. Ommen, directly and through his designees, administers and enforces Iowa Code chapters 507B—Insurance Trade Practices and 522B—Licensing of Insurance Producers, pursuant to Iowa Code § 505.8.
2. Will D.M. Major (“Major”) is an individual with a last-known residence address of 2358 S. 80th Ave. , Omaha, Nebraska 68114.
3. Major is and has been licensed in the state of Iowa as a nonresident insurance producer since January 21, 2019. Major is licensed under National Producer Number 19013320.
4. Pursuant to Iowa Code § 505.28, Respondent consented to the jurisdiction of the Commissioner of Insurance by committing acts governed by chapters 507B and 522B.
5. From on or about November 11, 2022, to present, Major engaged in acts and practices constituting cause for probation, suspension, or revocation of his insurance producer license; cease and desist orders; and civil penalties or other relief under Iowa Code chapters 505, 507B, 522B, and rules adopted pursuant to these chapters.

II. FINDINGS OF FACT

6. Major applied for a nonresident insurance producer license with the Division by submitting a Uniform Application for Individual Producer License (“Uniform Application”) through the National Insurance Producer Registry. In submitting the Uniform Application, Major designated the Commissioner as an agent for service of process.
7. The Division issued Major a license as a nonresident insurance producer on January 19, 2019. Major was assigned National Producer Number 19013320.
8. Major was employed by a Nebraska domestic insurance agency (“Employer”), which is a captive agency for State Farm Fire & Casualty Company (“State Farm”), as a Commercial Account Executive from July 18, 2018, until July 26, 2023, when he was terminated for cause. Major continued to receive severance pay from his Employer until December 31, 2023.
9. On or about November 11, 2022, Major was communicating with a real estate development firm, Company A, regarding potential State Farm Insurance coverage. Company A indicated that it was constructing a new apartment complex, in Nebraska and due to the fact that it was nearing completion of construction, requested a quote for a commercial insurance policy. Major provided Company A with an impact resistant roofing attestation form (“IRR Form”) for Company A’s roofing contractor to complete. Company A then advised Major that the complex in question did not have impact resistant roofing shingles.
10. On December 19, 2022, Major submitted an insurance application on behalf of Company A for the new apartment complex. Major falsified an IRR Form for the property in question and therein indicated that the property had impact resistant roofing installed, although it did not. Major submitted the aforementioned IRR Form for Company A to State Farm in support of its application for insurance. State Farm issued the policy, which would allow for coverage

eligibility for Company A above State Farm's self-imposed coverage "cap" due to the impact-resistant roof that was reported on the IRR Form. Major was paid a commission on the sale of this policy.

11. Major knew that State Farm company policy required impact-resistant roofing shingles to be used on properties exceeding \$15,000,000 in property value to be eligible for coverage in Nebraska. Major was aware of the apartment complex's value, and he knew that, without impact-resistant roofing shingles, the State Farm would not issue a policy for the property in question.

12. In or around April 2023, State Farm conducted an internal investigation into applications for commercial policies with impact resistant roofing submitted through Major's Employer at the time.

13. On June 8, 2023, a State Farm investigator interviewed Major. During the interview, Major admitted to falsifying information on the IRR Form he submitted with Company A's application for a commercial policy. Major admitted that he completed the form electronically and applied the signature of the roofing contractor without the roofing contractor's knowledge or consent. Major also admitted to submitting another falsified IRR Form in connection with a different application for a commercial policy submitted on behalf of another large apartment complex.

14. On July 26, 2023, Major's employment with Employer was terminated; and State Farm terminated his appointment. Major did continue to receive severance pay related to his employment and appointment.

15. On September 5, 2023, State Farm notified the Division of Major's termination for cause.

16. On September 12, 2023, a Division investigator sent Major a Request for Information letter ("RFI") and Termination for Cause Questionnaire ("TFC") via email. On September 21,

2023, in response to Major's request via email, the Division granted Major an extension to provide a response.

17. No consumer, including Company A, was harmed financially as a result of Major's actions.

18. On September 28, 2023, Major provided the Division with responses to the RFI and TFC, and a written and signed statement concerning his conduct. Major admitted to falsifying information on IRR Forms and submitting said IRR Forms with applications for commercial insurance. Major acknowledges that his actions were, "dishonest in nature, as the roofing materials on the properties were not, in fact, impact resistant." Major was cooperative for the Division's investigation.

III. CONCLUSIONS OF LAW

COUNT I

Fraudulent Statements Related to Insurance Applications

19. Under Iowa Code § 507B.4(3) "a person shall not engage in this state in any trade practice which is defined in this chapter as, or determined pursuant to section 507B.6 to be, an unfair method of competition, or an unfair or deceptive act or practice in the business of insurance."

20. Iowa Code § 507B.4(3)(n) defines as an unfair trade practice "[m]aking false or fraudulent statements or representations on or relative to an application for an insurance policy, for the purpose of obtaining a fee, commission, money, or other benefit from any insurer, agent, broker, or individual."

21. Major committed an unfair trade practice by submitting at least two IRR Forms in connection with applications for insurance and thereby securing coverage for which the consumers would not otherwise be eligible. Major received commission for at least one of these

transactions.

22. Major's acts and practices violated Iowa Code §§ 507B.3 and 507B.4, subjecting Major to probation, suspension, or revocation of Major's insurance producer license, the imposition of a civil penalty, an order requiring Major to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 507B.7 and 505.8

COUNT II
**Using Fraudulent, Coercive, or Dishonest Practices or
Demonstrating Incompetence or Untrustworthiness**

23. Under Iowa Code § 522B.11(1)(h), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business.

24. Major engaged in fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility, by forging by electronically signing an IRR Form on behalf of a roofing contractor without the roofing contractor's knowledge or consent, on an IRR Form in connection with an application for insurance.

25. Major engaged in fraudulent, coercive, or dishonest practice, or demonstrated incompetence, untrustworthiness, or financial irresponsibility, by representing on the same IRR Form mentioned in the immediately preceding paragraph, that the complex had impact-resistant roofing despite Company A advising Major that the complex did not, in fact, have impact-resistant roofing.

26. Major's acts and practices violated Iowa Code § 522B.11(1)(h) subjecting Major to probation, suspension, or revocation of Major's insurance producer license, the imposition of a

civil penalty, an order requiring Major to cease and desist from engaging in such acts or practices, an order of restitution, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

IV. ORDER

WHEREFORE, IT IS ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code chapters 507B and 522B:

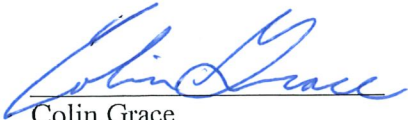
- A. Major's Iowa nonresident insurance producer license is immediately revoked pursuant to Iowa Code §§ 507B.7 and 522B.11;
- B. Major, pursuant to Iowa Code §§ 507B.7 and 522B.17, shall immediately cease and desist from engaging in the business of insurance in the state of Iowa;
- C. Major shall, contemporaneously with this Order, pay the amount of \$812.50 for the costs of investigation of this matter pursuant to Iowa Code § 505.8. Payment shall be made payable to the Iowa Insurance Division, to be credited to the Iowa Insurance Enforcement Fund to provide funds for insurance enforcement and education; and
- D. These orders may be enforced under Iowa Code chapters 507B and 522B, including but not limited to Iowa Code §§ 507B.8 and 522B.17(3), and additionally, by any collection remedies available to the State of Iowa Department of Revenue for unpaid penalties and other ordered monetary.

SO ORDERED on the 19th day of March, 2025.



DOUGLAS M. OMMEN
Iowa Insurance Commissioner

Respectfully submitted,



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ATTORNEY FOR THE DIVISION

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**ATTORNEY FOR
RESPONDENT:**
Will D.M. Major

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause, or their attorney, at their respective addresses disclosed on the pleadings on March 20, 2025.

By: First Class Mail () Personal Service
() Restricted certified mail, return receipt Email, by consent
() Certified mail, return receipt () _____

Signature: Brooke Hohn
Brooke Hohn

NOTICE OF PENALTIES FOR WILLFUL VIOLATION OF THIS ORDER

YOU ARE NOTIFIED that acting as an insurance producer, as defined in Iowa Code chapter 522B, in violation of this Order, is a felony under Iowa Code § 507A.10, subjecting you to punishment of imprisonment, jail, fines, or any combination of custody and fines.

YOU ARE ALSO NOTIFIED that if you violate this Order, you may be subject to administrative and civil penalties pursuant to Iowa Code § 522B.17(3). The Commissioner may petition the district court to hold a hearing to enforce the order as certified by the Commissioner. The district court may assess a civil penalty against you in an amount not less than three thousand dollars but not greater than ten thousand dollars for each violation, and may issue further orders as it deems appropriate.

NOTICE REGARDING REISSUANCE

Upon entry of this Order, your insurance producer license will become inactive, in the state of Iowa, due to revocation. While your license is inactive, you are prohibited from conducting the business of insurance. Your license will not be active until the Division makes the determination to reissue your insurance producer license by order pursuant to Iowa Administrative Code 191—10.10. Reissuance of your insurance producer license is subject to the discretion of the Commissioner. Additionally, it will not be granted unless and until you have complied with the terms of this Order, made the appropriate Application for Reissuance with the Division, and paid all applicable fees. If applicable, you may also be required to apply for licensure through the National Insurance Producer Registry (NIPR) and pay all applicable fees.

NOTICE OF FINAL ORDER IMPACT

A final order of license revocation or a cease and desist order may adversely affect other existing business or professional licenses and may result in license revocation or disciplinary action.

A final order in an administrative action does not resolve any potential criminal or civil violations or causes of action that might arise from the same or similar conduct that is the subject of this this order. It may result in criminal law enforcement authorities, including the fraud bureau of the Iowa Insurance Division, pursuing a criminal investigation or prosecution of potential criminal law violations.

CONSENT TO ORDER AND AGREEMENT

I, Will D.M. Major, Respondent in this matter, have read, understood, and do knowingly consent to this Order in its entirety. I understand and acknowledge I have the right to consult with an attorney on this matter if I choose to do so, and I acknowledge that the Division cannot provide me an attorney, nor can the Division provide me legal advice. By executing this Order, I understand that I am waiving my rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review.

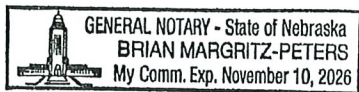
I further understand this Order is considered a final administrative action that will be reported by the Division to the National Association of Insurance Commissioners and to other regulatory agencies. I also understand this Order is a public record under Iowa Code chapter 22 and information may be shared with other regulatory authorities or governmental agencies, pursuant to Iowa Code § 505.8(8)(d). I also understand this Order will be posted to the Division's website, and a notation will be made to the publicly available website record that administrative action has been taken against me.

Dated: 03/12/2025

Will D.M. Major
Will D.M. Major, Respondent

2358 S. 80th Ave Omaha, NE 68129
Address of Signatory

Subscribed and sworn before me by Will D.M. Major on this 12th day of March, 2025.



Brian Margritz-Peters
Notary Public for the State of Nebraska