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JUL 08 2025

Department of Insurance
State of Idaho

RAÚL R. LABRADOR
Attorney General

Michael Witry—I.S.B. No. 7960
Deputy Attorney General
Idaho Department of Insurance
700 W. State Street, 3rd Floor
PO Box 83720
Boise, Idaho 83720-0043
Telephone No. (208) 334-4219
Facsimile No. (208) 334-4298
michael.witry@doi.idaho.gov

Attorneys for Idaho Department of Insurance

Before the Director of the Department of Insurance

State of Idaho

Idaho Department of Insurance,

Complainant,

vs.

Lionel Fajayan, an individual holding
Idaho Non-Resident Producer License
No. 9777262,

Respondent.

Docket No. 18-4706-25

Order of Default

The Director of the Idaho Department of Insurance (“Director”) having reviewed the record herein; and Lionel Fajayan (“Fajayan”) who currently holds Idaho Non-Resident Producer License No. 9777262, having been lawfully served the Verified Complaint and Notice of Right to Hearing (“Complaint”), a copy of which is attached hereto as Exhibit A and incorporated herein, and, as evident from the

Affidavit of Michael Witry, having failed to file an answer thereto and having failed to request a hearing regarding said Complaint; and the Director having found as a result thereof that Fajayan is in default and has waived his rights regarding the opportunity for hearing; and in consideration of the above;

It is hereby ordered that Idaho Non-Resident Insurance Producer License No. 9777262 issued to Lionel Fajayan is revoked effective immediately;

It is further ordered that Fajayan shall pay to the Idaho Department of Insurance an administrative penalty of two thousand dollars (\$2,000).

Dated this 2nd day of July 2025.

State of Idaho
Department of Insurance



Dean L. Cameron
Director

Notification Regarding Reportable Proceedings

This is considered a reportable administrative proceeding. As such, it is a public record and is public information that may be disclosed to other states and reported to companies by which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the online searchable database of the Idaho Department of Insurance.

Notification of Rights

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The agency will dispose of the motion for reconsideration within twenty-one (21) days of its receipt, or the motion will be considered denied by operation of law. *See Idaho Code* § 67-5246(4).

Any such motion for reconsideration shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
700 W State Street, 3rd Floor
PO Box 83720
Boise, ID 83720-0043

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order or orders previously issued in this case may file a petition for judicial review in the district court of the county in which: (1) a hearing was held; or (2) the final agency action was taken; or (3) the party seeking review of the order resides or

operates its principal place of business in Idaho; or (4) the real property or personal property that was subject of the agency action is located.

A petition for judicial review must be filed within twenty-eight (28) days of: (a) the service date of this final order; (b) the service of an order denying motion for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration, whichever is later. *See Idaho Code § 67-5273.* The filing of a petition for judicial review does not in itself stay the effectiveness or enforcement of the order under appeal. *See Idaho Code § 67-5274.*

Certificate of Service

I hereby certify that on this gtn day of July 2025, I caused a true and correct copy of the foregoing Verified Complaint and Notice of Right to Hearing to be served upon the following by the designated means:

Lionel Fajayan 4355 Kamloop Ave Apt 45 San Diego, CA 92117-4559	<input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Email: lfajayan@allsurance.net lfajayan@aol.com
Fidelity & Guaranty Life Ins. Co. 801 Grand Ave Ste 2600 Des Moines, IA 50309	<input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Email
Guarantee Trust Life Ins. Co. 1275 Milwaukee Ave Glenview, IL 60025	<input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Email



Jan Noriyuki
Paralegal

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State of Idaho

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Attorney General

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Before the Director of the Department of Insurance

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Idaho Department of Insurance,

Complainant,

vs.

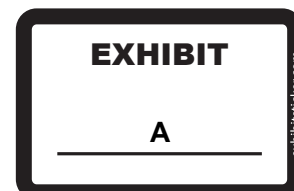
Lionel Fajayan, an individual holding
Idaho Non-Resident Producer License
No. 9777262,

Respondent.

Docket No. 18-4706-25

**Verified Complaint and Notice
of Right to Hearing**

Comes now the staff of the Idaho Department of Insurance (“Department”), by and through its undersigned counsel, Michael Witry, Deputy Attorney General, and does hereby give notice of verified allegations constituting violation(s) of Idaho law, notice that relief will be requested from the Director of the Department, and a notice



of the right to contest the allegations and requested relief herein and right to hearing to:

Lionel Fajayan
Idaho Non-Resident Producer License No. 9777262

The Department alleges the following facts and violations of title 41, Idaho Code, as itemized below. The Department will present an order seeking the relief described below upon twenty-one (21) days following service of this Verified Complaint, and Lionel Fajayan is further notified of his right to object to the requested relief, including the basis for any objection, and to request a hearing in writing.

Jurisdiction

1. Jurisdiction in this matter is founded in the Idaho Insurance Code, Idaho Code § 41-101 et seq., including Idaho Code § 41-210, which authorizes the Director of the Department of Insurance (“Director”) to enforce the provisions of title 41 of the Idaho Code, including those governing Respondent’s activities as an insurance producer.

2. Jurisdiction is further founded in Idaho Code § 41-213, which authorizes the Department to institute such proceedings as deemed necessary for the enforcement of any provision of the Idaho Insurance Code including, but not limited to, license revocation and the imposition of administrative penalties.

Respondents

3. Lionel Fajayan (hereinafter “Fajayan”) was a California resident during all pertinent times as alleged herein. He carries Idaho Non-Resident Producer License No. 9777262, which is set to expire on September 30, 2025.

Controlling Law

4. Idaho Code § 41-1016(1) provides that the Director may suspend, revoke or refuse to issue or renew a producer’s license and may impose an administrative penalty up to one thousand dollars (\$1,000), if the Director finds that any of the causes or violations set forth in subsections 41-1016(1)(a) through (o) exist, including specifically subsections (b) and (i), which prohibit:

(b) Violating any provision of title 41, Idaho Code, department rule, subpoena or order of the director or of another state’s insurance director;

...

(i) Having an insurance license denied, suspended or revoked in any other state, province, district or territory;

...

5. Idaho Code § 41-1021(1) provides that a producer shall report to the Director any administrative action taken against the producer in another jurisdiction or by another governmental agency within thirty (30) days of the final disposition of the matter. This report shall include a copy of the order, consent order or other relevant legal documents.

6. Idaho Code § 41-117 provides that each instance of violation may be considered a separate offense.

7. Pursuant to Idaho Code § 41-1026(3), the Director shall not issue a license under title 41, Idaho Code, to any person whose license has been revoked until after the expiration of not less than one (1) year to a maximum of five (5) years and, upon a former licensee's application for re-licensure, the Director may require the former licensee "to show good cause why the prior revocation ... shall not be deemed a bar to the issuance of a new license."

Count I

8. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

9. On or about March 25, 2025, the Utah Insurance Commissioner revoked Fajayan's Utah non-resident producer individual license for two violations of the Utah Code.

10. Fajayan was required to report this action to the Department by April 25, 2025.

11. Fajayan did not report this action to the Department by April 25, 2025.

12. On April 25, 2025, Lori Thomason of the Department attempted to contact Fajayan via email and telephone to remind him of his obligation to report the action.

13. As of this date, Fajayan has not reported the action to the Department.

14. By failing to report a disciplinary action in violation of Idaho Code § 41-1021(1), Fajayan subjected himself to discipline pursuant to Idaho Code § 41-1016(1)(b).

15. Because Fajayan's insurance license was revoked in Utah, he is subject to discipline pursuant to Idaho Code § 41-1016(1)(i).

Prayer for Relief

Based on the foregoing facts and allegations, the Department prays for relief as follows:

1. For an Order revoking Lionel Fajayan's Idaho Non-Resident Producer License No. 9777262, and providing that Fajayan shall not be issued a new license under title 41, Idaho Code, for a period of five (5) years after which time, in the event Fajayan seeks a new license, Fajayan must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license; and

2. For an Order imposing an administrative penalty against Fajayan in the amount of \$1,000 for each violative act as alleged herein in such total number as shall be proven at hearing, but, in the event of a default, an amount not less than Two Thousand Dollars (\$2,000), which represents \$1,000 per violation of title 41, Idaho Code, as alleged herein; and

3. For such other and further relief as the Director deems just and necessary under the circumstances.

Notification of Rights

To: Lionel Fajayan, the above-named Respondent:

Pursuant to Idaho Code § 41-232A, you have the right to a hearing on this matter. In order to exercise this right, a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the 21-day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2). If you fail to submit a timely written response to the allegations within 21 days of the service of this Complaint, a final order will be entered imposing the relief described above.

Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter at the following address:

Michael Witry
Deputy Attorney General
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

In lieu of a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241(1)(c). Should

you wish to discuss these options, please contact the undersigned deputy attorney general.

Dated this 11th day of June 2025.

State of Idaho
Office of the Attorney General



Michael Witry
Deputy Attorney General
Attorneys for Idaho Department of Insurance

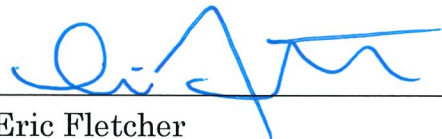
Verification

State of Idaho)
 : ss.
County of Ada)

Eric Fletcher, Company Activities Bureau Chief of the Department of Insurance, State of Idaho, being first duly sworn, deposes and says:

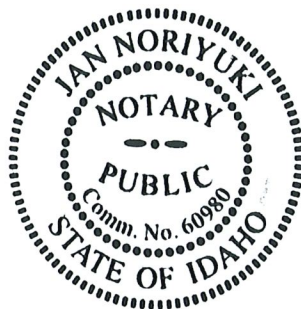
I have read the foregoing Verified Complaint and Notice of Right to Hearing and know the contents thereof and the same are true to the best of my knowledge and belief.


Dated this 11 day of June 2025.



Eric Fletcher
Company Activities Bureau Chief

Subscribed and sworn to before me the undersigned Notary Public of Idaho this 11th day of June 2025.






Notary Public for Idaho
My Commission Expires: 01-28-2031

Certificate of Service

I hereby certify that on this 11th day of June 2025, I caused a true and correct copy of the foregoing Verified Complaint and Notice of Right to Hearing to be served upon the following by the designated means:

Lionel Fajayan 4355 Kamloop Ave Apt 45 San Diego, CA 92117-4559	<input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> First Class Mail <input checked="" type="checkbox"/> Email: lfajayan@allsurance.net lfajayan@aol.com
Fidelity & Guaranty Life Ins. Co. 801 Grand Ave Ste 2600 Des Moines, IA 50309	<input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Email
Guarantee Trust Life Ins. Co. 1275 Milwaukee Ave Glenview, IL 60025	<input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Email



Jan Noriyuki
Paralegal