STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of: CONSTANCE LEAKE, Respondent.	Case No. INS-26-0027 FINAL ORDER TO CEASE AND DESIST AND ORDERS REVOKING LICENSE AND ASSESSING CIVIL PENALTIES, ENTERED BY DEFAULT THIS IS A FINAL ORDER

On September 15, 2026, the Director of the Department of Consumer and Business Services for the State of Oregon ("Director"), acting by and through the Oregon Division of Financial Regulation ("Division") and in accordance with Oregon Revised Statutes ("ORS") 731, 732, 733, 734, 735, 737, 742, 743, 743A, 743B, 744, 746, 748 and 750 ("Insurance Code"), served an Order to Cease and Desist, Proposed Orders Revoking License and Assessing Civil Penalties, and Notice of Right to a Hearing ("Notice") on Constance Leake ("Leake").

The Notice offered Leake an opportunity for a hearing if requested within 20 days of the Notice. The Notice further informed Leake that if a hearing were not conducted because Leake did not timely request a hearing or otherwise defaulted, then the designated portion of the Division's file and all materials submitted by Leake in this case would automatically become part of the contested case record for the purpose of proving a prima facie case.

Leake did not submit a request for hearing to the Director, and the Director did not conduct a hearing.

The Director finds that the record of this proceeding proves a prima facie case.

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Now, therefore, after considering the relevant portions of the Division's file relating to this matter, the Director finds and orders as follows.

FINDINGS OF FACT

The Director FINDS that:

1. Leake is licensed as an Oregon nonresident insurance producer. Leake's National Producer Number (NPN) is 20631774. Leake's last known business address is ONE Norterra DR Phoenix, Arizona 85085. Leake received her Oregon nonresident insurance producer license on May 17, 2023.

2. Until December 10, 2025, Leake was appointed as a producer with United States Automobile Association ("USAA") and several of its subsidiaries.

3. On December 10, 2025 USAA terminated Leake's appointments with USAA and its subsidiaries for cause.

4. USAA notified the Division of Leake's termination on December 12, 2025.

The RW Transaction

5. On December 2, 2024, a USAA policyholder who will be identified for purposes of this Order as RW contacted USAA by telephone to make a payment toward the premium on his policy. RW's call was routed to Leake.

6. In the course of her call with RW, Leake requested and received RW's credit card information before connecting RW to an automated line to make his payment.

7. On December 2, 2024, Leake made two payments toward the premium on her own USAA insurance policy using RW's payment information: a first payment in the amount of $350.89 and a second payment in the amount of $1,099. [1]

8. On December 17, 2024, Leake attempted to make a third payment on her own USAA insurance policy in the amount of $917.73 using RW's payment information; however, that payment was declined.

[1] On knowledge and belief, these charges—totaling $1,449.89—have not been reversed.

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The MH Transactions

9. On August 20, 2025, a USAA policyholder who will be identified for purposes of this Order as MH contacted USAA to get a quote for insurance and to purchase a policy. MH's call was routed to Leake.

10. In the course of her call with MH, Leake instructed MH to provide his payment information to the automated system; however, Leake did not immediately transfer MH to the automated system. Instead, Leake remained on the line while MH provided his payment information.

11. On September 16, 2025 Leake made a payment toward the premium on her own USAA insurance policy in the amount of $2,819.23 using MH's payment information. [2]

12. At around this time, Leake also added MH's payment information to her own USAA customer profile under the name "Buddy."

CONCLUSIONS OF LAW

The Director CONCLUDES that:

Fraud Related to Insurance

13. ORS 744.074(1)(g) forbids any person from committing "any unfair trade practice or fraud related to insurance."

14. Leake committed fraud relating to her work in the insurance industry in three instances by using RW's payment information to pay or attempt to pay the premium on her own USAA insurance policy.

15. Leake committed fraud relating to her work in the insurance industry in one instance by using MH's payment information to pay the premium on her own USAA insurance policy.

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[2] On knowledge and belief, MH successfully disputed this payment and the $2,819.33 was charged back on 10/23/2025.

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Fraudulent, Coercive and Dishonest Practices

16. ORS 744.074(1)(h) forbids insurance producers from using "fraudulent, coercive or dishonest practices" in conducting insurance business in this State.

17. Leake violated ORS 744.074(1)(h) in two instances by using her role as an insurance producer to obtain the payment information of RW and MH.

Authority for Licensing Action

18. Pursuant to ORS 744.074(1)(g), the Director may "place a licensee on probation or suspend, revoke or refuse to issue or renew an insurance producer license" for engaging in "fraud related to insurance."

19. Moreover, pursuant to ORS 744.074(1)(h), the Director may "place a licensee on probation or suspend, revoke or refuse to issue or renew an insurance producer license" for using "fraudulent, coercive or dishonest practices" in conducting insurance business in this State.

20. Leake committed "fraud related to insurance" as described in Paragraph 13-15, above, and engaged in "fraudulent, coercive or dishonest practices" as described in Paragraph 16-17, above.

Cease and Desist Authority

21. Pursuant to ORS 731.252(1), whenever the Director has reason to believe that any person has been engaged or is engaging or is about to engage in any violation of the Insurance Code, the Director may issue an order to discontinue or desist from such violation or threatened violation.

Civil Penalties Authority

22. Pursuant to ORS 731.988(1), the Director may assess civil penalties in the amount of $1,000 per violation against any person who violates the Insurance Code.

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23. Pursuant to ORS 731.988(2), the Director may assess an additional civil penalty in the amount by which a person who violated the Insurance Code has profited from the violation.

ORDERS

The Director issues the following Orders:

Cease and Desist Order

24. Pursuant to ORS 731.252(1), the Director ORDERS Leake to Cease and Desist from violating 744.074(1)(g) and 744.074(1)(h).

License Revocation

25. Pursuant to ORS 744.074(1)(g) and ORS 744.074(1)(h), the Director hereby REVOKES Leake's Oregon nonresident insurance producer license.

Civil Penalties

26. The Director hereby assesses CIVIL PENALTIES against Leake in the amount of $7,449.89 as follows:

(a) $4,000 for violating ORS 744.074(1)(g), as described in Paragraphs 13-15, above;

(b) $2,000 for violating ORS 744.074(1)(h), as described in Paragraphs 16-17, above; and

(c) $1,449.89 as an additional civil penalty in the amount that Leake profited through her fraudulent use of RW's payment information, as described in Paragraph 7, above.

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FINAL ORDER

27. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that provision, the entry of this Order does not limit other remedies that are available to the Director under Oregon law.

SO ORDERED this 19th day of October, 2026.

Sean E. O'Day, Director
Department of Consumer and Business Services

/s/ Dorothy Bean

Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

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