

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.  
GLEN MULREADY, Insurance  
Commissioner,

Plaintiff,

v.

UNION MUTUAL INSURANCE  
COMPANY, a licensed mutual  
insurance company in the State of  
Oklahoma,

Defendant.

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

MAR 26 2025

RICK WARREN  
COURT CLERK

Case No. CJ-2025- 108

**CJ-2025-2010**

**APPLICATION FOR ORDER PLACING UNION MUTUAL INSURANCE COMPANY  
INTO RECEIVERSHIP, APPOINTING RECEIVER, AND ISSUING INJUNCTION**

COMES NOW the State of Oklahoma, ex rel. Glen Mulready, Insurance Commissioner, by and through his attorney, Teresa L. Green, and requests the Court to issue an order placing Union Mutual Insurance Company ("UMIC") into receivership for the purpose of rehabilitation and appointing the Insurance Commissioner as Receiver of UMIC. The Insurance Commissioner also requests the Court to issue an injunction enjoining UMIC from further transacting business or wasting or otherwise disposing of its property and assets until further order of the Court. In support of this Application, the Insurance Commissioner states as follows:

**PARTIES, JURISDICTION, AND VENUE**

1. Glen Mulready is the duly elected and acting Insurance Commissioner of the State of Oklahoma and as such is charged with the duty of administering and enforcing the Oklahoma Insurance Code. Okla. Const. art. VI, § 22; 36 O.S. § 307.

2. UMIC is an Oklahoma domestic mutual insurance company licensed to transact the business of insurance under the laws of the State of Oklahoma and holding certificate of insurance number 44195752 and NAIC Code Number 28681.

3. The Insurance Commissioner has authority to request the Oklahoma County District Court to issue an Order to direct insurers, including mutuals, to show cause why it should not be placed in receivership. 36 O.S. §§ 1903. However, in the current matter a hearing to show cause as to why the mutual should not be placed in receivership is unnecessary. UMIC has consented to being placed into receivership.

4. The Court has jurisdiction over this matter pursuant to the provisions of 36 O.S. § 1902(A), which gives the Oklahoma County District Court exclusive original jurisdiction of delinquency proceedings against insurance companies.

5. Venue is proper in the District Court within Oklahoma County pursuant to the provisions of 36 O.S. § 1902(F).

#### **STATEMENT OF VERIFIED FACTS**

6. On or about March 25, 2025, the Board of UMIC resolved, through a majority of its directors, to consent to the entry of an order placing UMIC into receivership, appointing the Oklahoma Insurance Commissioner as receiver of UMIC, and issuing a permanent injunction.

7. The Insurance Commissioner may apply to the District Court for an order appointing the Insurance Commissioner as receiver of and directing the Insurance Commissioner to rehabilitate UMIC if the company has consented to such an order through a majority of its directors, stockholders, members or subscribers. See 36 O.S. § 1905(9).

8. UMIC has on deposit with the State of Oklahoma through the Insurance Commissioner a security deposit in the amount of approximately \$300,000.00, which is required

for authority to transact insurance in Oklahoma. Said deposit may be released to the Receiver of UMIC upon proper order of this Court. 36 O.S. § 6913(B)(4).

9. Pursuant to 36 O.S. § 1904(C), “no bond shall be required of the Insurance Commissioner as a prerequisite for the issuance of any injunction....”

10. Pursuant to 36 O.S. § 1914(F), the Insurance Commissioner may appoint one or more assistant commissioners to act for him and may employ such counsel, clerks, and assistants as he deems necessary and within the duties imposed upon them. The Insurance Commissioner appoints Donna Wilson as Assistant Receiver to act for the Insurance Commissioner as Assistant Receiver of UMIC.

#### **PRAYER FOR RELIEF**

WHEREFORE, premises considered, the State of Oklahoma prays the Court to enter an order placing UMIC into receivership; appointing Glen Mulready, Insurance Commissioner, as Receiver, without bond; appointing Donna Wilson as Assistant Receiver; and releasing UMIC’s security deposit to the Receiver.

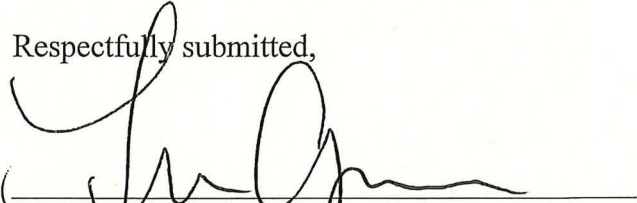
Furthermore, because certain actions will or could reasonably be expected to cause significant, imminent, and irreparable injury to the policyholders, creditors, and/or the public, the Applicant prays the Court enter an injunction as follows:

A. Pursuant to 36 O.S. § 1904(A), enjoining UMIC, its officers, directors, stockholders, members, subscribers, agents, and all other persons from transacting any further business of UMIC and wasting or disposing of UMIC’s assets until further order of this Court; and

B. Pursuant to 36 O.S. § 1904(B), enjoining any person or entity from interfering with the Insurance Commissioner or these proceedings; wasting the assets of UMIC; commencing or

prosecuting any actions against UMIC; obtaining any preferences, judgments, attachments, or other liens against UMIC; and making of any levy against UMIC or its assets or any part thereof.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Kim Hunter', written over a horizontal line.

Kim Hunter, OBA #16625

Nicole Nash, OBA # 31412

Teresa L. Green, OBA #32897

Oklahoma Insurance Department

400 N.E. 50<sup>th</sup> Street

Oklahoma City, Oklahoma 73105

Phone: (405) 521-2746

Fax: (405) 522-0125

ATTORNEYS FOR THE INSURANCE  
COMMISSIONER

STATE OF OKLAHOMA                     )  
  )       SS.  
COUNTY OF OKLAHOMA               )

I am the Insurance Commissioner for the State of Oklahoma, and I have read the foregoing Application for Order Placing Union Mutual Insurance Company into Receivership, Appointing Receiver, and Issuing Injunction and that the contents thereof and the facts set forth therein are within my personal knowledge and are true to the best of my knowledge.

*Sh. Mulready*  
MULREADY

GLEN MULREADY  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA

Subscribed and sworn to before me this 26 day of March, 2025, by Glen Mulready.

\_\_\_\_\_  
Notary Public

Notary Public

My Commissioner Number: 20003481  
My Commissioner Expires: 3/26/28

[SEAL]

