

**STATE OF ARIZONA**

**DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS**

In the Matter of:

**SULLA, VLADIMIR**

(National Producer No. 985185)

Respondent.

**No. 22A-062-INS**

**CONSENT ORDER**

The Arizona Department of Insurance and Financial Institutions (“Department”) has received evidence that **Vladimir Sulla** (“**Respondent**”) violated provisions of Arizona Revised Statutes (“A.R.S.”) Title 20. Respondent 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. Respondent was at all material times licensed as an Arizona non-resident insurance producer, National Producer Number 985185, with a line of authority in accident and health or sickness insurance. The Department first licensed Respondent on June 20, 2012. Respondent’s license is scheduled to expire on May 31, 2024.

2. Respondent’s business and mailing address of record with the Department is 2103 Lucaya Bend, Apt. L4, Coconut Creek, Florida 33066-1144. Respondent’s email address of record with the Department is [vladsulla@gmail.com](mailto:vladsulla@gmail.com).

3. On or about November 24, 2021, the Department received a letter from Human Insurance Company (“Humana”) notifying the Department that Respondent’s

1 appointments with Human have been “terminated, for cause” due to Respondent’s  
2 engagement in “fraudulent or dishonest acts or practices.”

3 4. The Department commenced an investigation into this matter.

4 5. The Department’s investigation determined that Respondent enrolled two  
5 Arizona consumers in Medicare Advantage plans without their consent.

6 a.) On or about February 11, 2021, Respondent e-signed and submitted an  
7 application for Humana Gold Plus HMO plan through Application  
8 Programming Interface (“API”) on behalf of M.A., without M.A.’s consent.

9 A review of a recorded call between M.A. and Respondent revealed that M.A.  
10 never authorized Respondent to enroll her in an HMO plan, and that  
11 Respondent failed to recite the mandated disclosures to M.A. during the call.  
12 The Department attempted to contact M.A. by telephone on June 1, 2022 and  
13 September 9, 2022 without success.

14 b.) On or about February 19, 2021, Respondent submitted and e-signed an  
15 application for Humana Gold Plus HMO plan through API on behalf of E.A.,  
16 without E.A.’s consent. A review of a recorded call between E.A. and  
17 Respondent revealed that E.A. never authorized Respondent to enroll her in an  
18 HMO plan, and Respondent failed to recite the mandated disclosures to E.A.  
19 during the call. The Department attempted to contact E.A. on June 1, 2022  
20 and September 9, 2022 but received a message that the phone number is no  
21 longer in service.

22 c.) On or about May 3, 2022, a Department’s investigator met with Respondent to

1 discuss Humana’s allegations and investigator’s review of the call recordings.  
2 During the meeting, Respondent stated that he “was not sure” and he had “no  
3 explanation” as to why he would submit an application without a consumer’s  
4 consent. Respondent acknowledged that he did not have any further  
5 communication with M.A. or E.A. besides the recorded calls.

6 **CONCLUSIONS OF LAW**

7 6. The Director has jurisdiction over this matter.

8 7. Respondent’s conduct, as described above, constitutes a violation of Title 20  
9 or any rule, subpoena or order of the Director. A.R.S. § 20-295(A)(2).

10 8. Respondent’s conduct, as described above, constitutes using fraudulent,  
11 coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or  
12 financial irresponsibility in the conduct of business in this state or elsewhere. A.R.S. § 20-  
13 295(A)(8).

14 9. 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).

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**ORDER**

**IT IS HEREBY ORDERED THAT:**

10. Vladimir Sulla's Arizona non-resident insurance producer license, number 985185, is **suspended** for thirty (30) days following the effective date of this Order.

Effective this 21st day of February, 2023.



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Shane Foster, Acting Director  
Arizona Department of Insurance and Financial Institutions

1 **CONSENT TO ORDER**

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

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

9 4. Respondent 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 Respondent, including but not limited to violations of Arizona's Consumer Fraud Act.  
17 Respondent acknowledges that, other than with respect to the Department, this Consent  
18 Order makes no representations, implied or otherwise, about the views or intended actions  
19 of any other state agency or officer or political subdivision of the state relating to this matter  
20 or other matters concerning Respondent.

21 5. Respondent 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

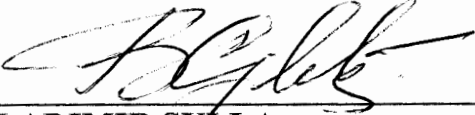
1 future, can result in disciplinary action which may include a greater civil money penalty and  
2 suspension or revocation of its license.

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

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

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02-16-2023  
DATE

  
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VLADIMIR SULLA  
(NATIONAL PRODUCER NO. 985185)

1 **COPY** of the foregoing delivered via email  
this 21st day of February, 2023, to:

2 Vladimir Sulla  
3 2103 Lucaya Bend, Apt. L4  
Coconut Creek, FL 33066-1144  
4 [vladsulla@gmail.com](mailto:vladsulla@gmail.com)  
Respondent

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

6 Deian Ousounov, Assistant Director  
7 Gio Espinosa, Regulatory Legal Affairs Officer  
Ana Starcevic, Paralegal Project Specialist  
8 Cathy O'Neil, Consumer Regulatory Affairs Officer  
Steven Fromholtz, Division Manager, Licensing  
9 Linda Lutz, Legal Assistant, Licensing  
Aqueelah Currie, Licensing Supervisor  
10 Michael Vukson, Investigator  
Arizona Department of Insurance and Financial Institutions  
11 100 North 15th Avenue, Suite 261  
Phoenix, Arizona 85007-2630

12  
13 *Ana Starcevic*  
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