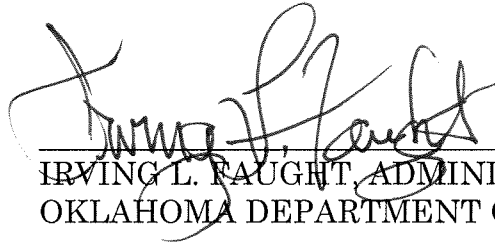


FURTHER AFFIANT SAYETH NOT.

Dated this 28th day of June, 2018.

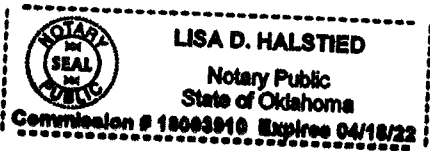
(SEAL)

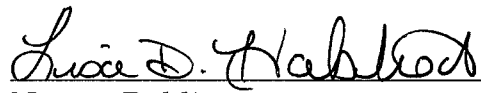


IRVING L. FAUGHT, ADMINISTRATOR OF THE
OKLAHOMA DEPARTMENT OF SECURITIES

Subscribed and sworn to before me this 28 day of June, 2018.

(SEAL)




Notary Public

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Bradley Allen Latting (CRD #4850825),

Respondent.

ODS File 18-099

NOTICE OF OPPORTUNITY FOR HEARING

1. On the 28th day of June, 2018, the attached Enforcement Division Recommendation ("Recommendation"), in support of the imposition of sanctions on Bradley Allen Latting ("Respondent") pursuant to Section 1-411 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2017), was left in the office of the Administrator of the Oklahoma Department of Securities ("Administrator").

2. Pursuant to 660:2-9-1 of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (effective November 1, 2016) ("Rules") and Section 1-411 of the Act, the Administrator hereby gives notice to Respondent of his obligation to file an answer and his right to request a hearing to show why an order based on the Recommendation should not be issued.

3. The answer must be in writing and received by the Administrator within fifteen (15) days after service of this Notice. As required by 660:2-9-2 of the Rules, the answer shall indicate whether Respondent requests a hearing and shall specifically admit or deny each allegation contained in the Recommendation or state that Respondent does not have, and is unable to obtain, sufficient information to admit or deny each allegation. If Respondent intends in good faith to deny only a part of an allegation, Respondent shall specify so much of it as is true and shall deny only the remainder.

4. Failure to file an answer in compliance with 660:2-9-2 of the Rules, to include a request for a hearing as provided for herein, shall result in the issuance of an order barring Respondent from registration in any capacity under the Act, pursuant to Section 1-411 of the Act and 660:2-9-2 of the Rules.

5. Upon receipt of a written request, pursuant to 660:2-9-2 of the Rules, a hearing on the Recommendation shall be promptly scheduled or a written order denying hearing shall be issued.

6. Notice of the date, time, and location of the hearing shall be given to Respondent not less than forty-five (45) days in advance thereof, pursuant to 660:2-9-2 of the Rules.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 28th day of June, 2018.

(SEAL)

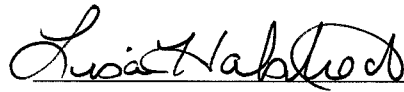


IRVING L. FAUGHT, ADMINISTRATOR OF THE
OKLAHOMA DEPARTMENT OF SECURITIES

CERTIFICATE OF MAILING

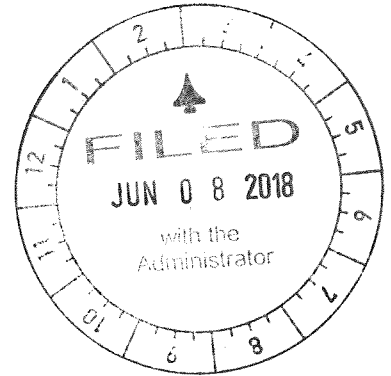
The undersigned hereby certifies that on the 28 day of June, 2018, a true and correct copy of the above and foregoing *Notice of Opportunity for Hearing* and the *Enforcement Division Recommendation* were mailed by certified mail, return receipt requested, delivery restricted, with postage prepaid thereon, addressed to:

Bradley Allen Latting
7805 NW Brady Way
Lawton, OK 73505



Lisa Halstied

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Bradley Allen Latting (CRD #4850825),

Respondent.

ODS File 18-099

ENFORCEMENT DIVISION RECOMMENDATION

The Enforcement Division of the Oklahoma Department of Securities ("**Department**") submits the following Findings of Fact, Authorities, and Conclusions of Law to the Administrator of the Department ("**Administrator**") in support of the imposition of sanctions on Bradley Allen Latting ("**Respondent**"), pursuant to Section 1-411 of the Oklahoma Uniform Securities Act of 2004 ("**Act**"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2017).

Findings of Fact

1. Respondent is, and has been at all material times, a resident of Oklahoma.

2. From May 2004 until February 2018, Respondent was registered under the Act as an agent of State Farm VP Management Corp. (CRD No. 43036) ("**State Farm VP**").

4. Respondent was discharged by State Farm VP. The Form U5 filed by State Farm VP for Respondent states: "The internal review concluded the individual did not follow policies related to the Banks [sic] checking account process. No securities products involved."

5. Respondent was also a licensed insurance producer in the State of Oklahoma under the Oklahoma Producer Licensing Act ("**Producer Act**"), Okla. Stat. tit. 36, §§ 1435.1 through 1435.41 (2011 & Supp. 2017), appointed under the Producer Act by State Farm Insurance Company ("**State Farm Insurance**").

6. On April 12, 2018, the Insurance Commissioner of the State of Oklahoma issued a *Notice of Hearing and Order to Show Cause* alleging the following:

a. State Farm Insurance had terminated Respondent for cause because its internal investigation showed that Respondent had obtained a power of attorney from an 88 year-old insurance client, transferred \$135,000 of her funds to a joint account owned by the client and himself without the client's knowledge, and admittedly commingled the funds with his own personal funds and used the funds for his own purposes before paying them back.

b. Respondent applied for a \$1,000,000 life annuity on behalf of the client without her knowledge wherein he stated that she was not a resident of a nursing home or assisted living facility when in fact she was.

7. An independent hearing officer conducted a hearing wherein Respondent appeared and represented himself.

8. On May 16, 2018, the independent hearing officer concluded that "Respondent violated 36 O.S. § 1435.13(A)(8) by using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business" and entered an order that revoked Respondent's insurance producer license.

To the extent any of these Findings of Fact are more properly characterized as Conclusions of Law, they should be so considered.

Authority

1. Section 1-411 of the Act provides, in pertinent part:

C. If the Administrator finds that the order is in the public interest and paragraphs 1 through 6, 8, 9, 10, 12 or 13 of subsection D of this section authorizes the action, an order under this act may censure, impose a bar, impose a civil penalty in an amount not to exceed a maximum of Five Thousand Dollars (\$5,000.00) for a single violation or Two Hundred Fifty Thousand Dollars (\$250,000.00) for multiple violations on a registrant, and/or recover the costs of the investigation from a registrant and if the registrant is a broker-dealer or investment adviser, from any partner, officer, or director, any person having a similar function or any person directly or indirectly controlling the broker-dealer or investment adviser.

D. A person may be disciplined under subsections A through C of this section if the person:

* * *

5. Is the subject of an order, issued after notice and opportunity for hearing by:

* * *

e. the insurance regulator of a state denying, suspending, or revoking the registration of an insurance agent[.]

* * *

13. Has engaged in dishonest or unethical practices in the securities, commodities, investment, franchise, banking, finance or insurance business within the previous ten (10) years[.]

* * *

G. An order may not be issued under this section, except under subsection F of this section, without:

1. Appropriate notice to the applicant or registrant;
2. Opportunity for hearing; and
3. Findings of fact and conclusions of law in a record in accordance with the Administrative Procedures Act. If the person to whom the notice is addressed does not request a hearing within fifteen (15) days after the service of notice is effective, a final order as provided in subsection A, B or C of this section may be issued.

Conclusions of Law

1. Respondent is the subject of an order, issued by the insurance regulator of the state of Oklahoma after notice and opportunity for hearing, revoking his Oklahoma insurance producer license.
2. Respondent has engaged in unethical practices in the insurance industry.

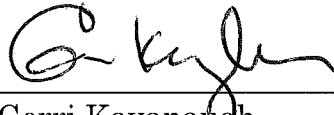
3. The Administrator is authorized under Section 1-411 of the Act to bar Respondent from registration in any capacity under the Act.

4. It is in the public interest for the Administrator to bar Respondent from registration in any capacity under the Act.

To the extent any of these Conclusions of Law are more properly characterized as Findings of Fact, they should be so considered.

WHEREFORE, it is recommended that the Administrator issue an order barring Respondent from registration in any capacity under the Act.

Respectfully submitted,



Gerri Kavanaugh
Terra Bonnell
Enforcement Attorneys
Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, OK 73102
(405) 280-7721
gkavanaugh@securities.ok.gov
tbonnell@securities.ok.gov