

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NUMBER: 11530-AG12-0912-105

IN THE MATTER OF:)

RONALD ERIC PIERCE)
3702 S. Reed Rd., Suite A)
Kokomo, Indiana 46902)

License No.: 611122)

Respondent.)

FILED

MAR 13 2013

STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

FINAL ORDER

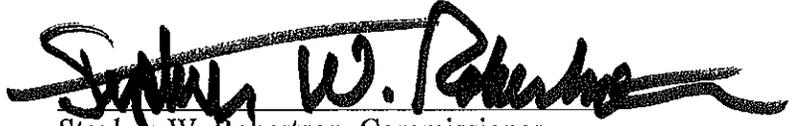
The Indiana Department of Insurance (“Department”) and Ronald Eric Pierce (“Respondent”), a licensed resident Indiana Insurance producer, signed an Agreed Entry which purports to resolve all issues involved in the action by the Department regarding Respondent’s license, and which has been submitted to the Commissioner of Insurance (the “Commissioner”) for approval.

The Commissioner, after reviewing the Agreed Entry, finds it has been entered into fairly and without fraud, duress or undue influence, and is fair and equitable between the parties. The Commissioner hereby incorporates the Agreed Entry as if fully set forth herein, and approves and adopts in full the Agreed Entry as a resolution of this matter.

IT IS THEREFORE ORDERED by the Commissioner of Insurance:

1. Respondent's insurance producer license number 611122, issued to Ronald Eric Pierce, is permanently revoked, effective immediately.

ALL OF WHICH IS ORDERED this 13th day of March, 2013.


Stephen W. Robertson, Commissioner
Indiana Department of Insurance

Distribution:

Bryan Shade, Attorney
Indiana Department of Insurance
311 West Washington Street, Suite 300
Indianapolis, Indiana 46204-2787

Ronald Eric Pierce
3702 S. Reed Rd., Suite A
Kokomo, IN 46902

Matthew J. Elkin, Attorney
208 North Main
Kokomo, IN 46901

Jarryd Anglin
Skiles DeTrude
150 E. Market St., Ste 200
Indianapolis, IN 46204

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License No.: 611122)
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STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

AGREED ENTRY

This Agreed Entry is entered into by Bryan Shade, Attorney for and on behalf of the State of Indiana, Department of Insurance ("Department"), and Ronald Eric Pierce ("Respondent"), a licensed Indiana insurance producer, to resolve all matters as stated in the Department's Amended Statement of Charges filed on November 28, 2012. This Agreed Entry is subject to the review and approval of the Commissioner for the Department.

WHEREAS, Pierce is a resident of Indiana;

WHEREAS, Pierce is a licensed insurance producer holding license number 611122; and,

WHEREAS, the Department and Respondent desire to resolve their differences and settle the issues without the necessity of an administrative hearing.

IT IS THEREFORE NOW AGREED by and between the parties as follows:

1. The Commissioner has jurisdiction over the subject matter of and the parties to

this administrative action.

2. This Agreed Entry is executed voluntarily by the parties.
3. Respondent voluntarily and freely waives his right to a public hearing on this matter.
4. Respondent voluntarily and freely waives his right to petition for judicial review of this agreement and the Commissioner's Final Order.
5. Respondent neither admits nor denies the allegations set forth in the Department's Amended Statement of Charges filed on November 28, 2012.
6. Respondent agrees to the permanent revocation of his Indiana insurance producer license number 611122.
7. The Department will not seek further penalties, monetary or otherwise, against Respondent, but will cooperate with any criminal investigation that has been, or may be, initiated as a result of the allegations in this matter.
8. The Department agrees to accept Respondent's compliance with the terms of this Agreed Entry as a full and final resolution of this matter.
9. Respondent is aware that failure to comply with any term of this agreement will result in the matter being set for hearing.
10. Respondent has carefully read this agreement and fully understands and accept its terms.
11. Should this Agreed Entry not be accepted by the Commissioner, it is agreed that presentation to and consideration of this Agreed Entry by the Commissioner shall not unfairly or illegally prejudice the Commissioner from further participation in or resolution of these proceedings.

12. Respondent has been represented by counsel throughout this matter.

3/7/13
Date Signed


Bryan Shade, Attorney
Indiana Department of Insurance

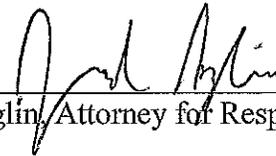
3-1-13
Date Signed


Ronald Eric Pierce, Respondent

2/28/13
Date Signed

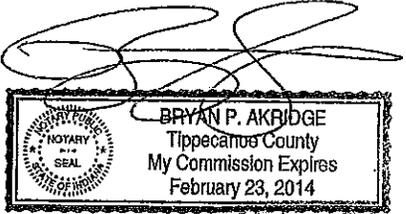

Matthew J. Elkin, Attorney for Respondent

3-5-13
Date Signed


Jarryd Anglin, Attorney for Respondent

STATE OF INDIANA)
) SS:
COUNTY OF _____)

Before me a Notary Public for TIPPECANOE County, State of INDIANA,
personally appeared Ronald Eric Pierce and being first duly sworn by me upon his oath, says that
the facts alleged in the foregoing instrument are true. Signed and sealed this 1 day of
March, 2013.



[Signature]
Signature

Ronald Eric Pierce
Printed

My Commission expires: 2-24-13

County of Residence: TIPPECANOE

Return executed originals to:
INDIANA DEPARTMENT OF INSURANCE
Enforcement Division, Suite 300
311 West Washington Street
Indianapolis, IN 46204-2787
317/233-4243 - telephone
317/232-5251 - facsimile

,STATE OF INDIANA)
) SS:
COUNTY OF MARION)

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License No.: 611122)

Respondent.)

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NOV 28 2012

STATE OF INDIANA
DEPT. OF INSURANCE

AMENDED STATEMENT OF CHARGES

The Enforcement Division of the Indiana Department of Insurance (“Department”), pursuant to Ind. Code 4-21.5-1 *et seq.* and 27-1-15.6 *et seq.*, files and Amended Statement of Charges against Respondent, Ronald Eric Pierce (“Respondent”), as follows:

FACTS

1. Respondent is a licensed resident producer holding license number 611122, with qualifications for Life, Accident & Health and Property & Casualty. Respondent’s license was issued by the Department on August 15, 2008.
2. Respondent owns a Farmers Insurance agency located at 3702 S. Reed Rd., Ste. A., Kokomo, Indiana 46913.

Forgery

3. On or about April 12, 2012, Respondent submitted a life insurance application to Farmers New World Life Insurance Company (“Farmers”) on behalf of Dale Neubaum (“Neubaum”). As a result, Farmers issued Neubaum a “\$75,000 simple term 10-year” policy.

4. The application lists “brandy sibray” [sic] as the “100% beneficiary,” and describes the relationship of Sibray to Neubaum as “Sibling.”
5. Sibray is not, nor has she ever been, Neubaum’s sibling.
6. The application lists Respondent as the producing agent, and Respondent’s initials are signed on numerous pages of the application packet including the “Electronic Signatures Authorization Form” and “certification” page.
7. Respondent also initialed the application’s “Agent’s Report” page which certifies that “all proposed insureds ... [were] present during the completion of the application.”
8. Neubaum was not present during the completion of the application.
9. The application’s “Bank Authorization” page established an automatic withdrawal from a checking account at Farmers Insurance Group Federal Credit Union (“FIGFCU”), account number ending in 2197.
10. Neubaum does not own, nor has he ever owned, a checking account at FIGFCU.
11. Neubaum’s initials are signed on six (6) pages of the application packet.
12. Neubaum neither signed the application nor gave authorization or consent for someone to sign it on his behalf.
13. Neubaum had no knowledge that Respondent submitted the application, nor did he authorize Respondent to submit the application on his behalf.
14. Based upon information and belief, Sibray is (or was) Respondent’s spouse or domestic partner.
15. On or about July 11, 2012, Respondent hired Megan Sheets (“Sheets”) as an insurance agent.
16. On or about July 24, 2012, Respondent submitted a life insurance application to Farmers on behalf of Sheets. As a result, Farmers issued Sheets a “\$100,000 simple term 10-year” policy.

17. The application lists "ronald pierce" [sic] as the "100% beneficiary," and describes the relationship of Pierce to Sheets as "Legal Guardian."
18. Respondent is not, nor has he ever been, Sheets' legal guardian.
19. The application lists Respondent as the producing agent, and Respondent's signature is located on numerous pages of the application packet including the "Electronic Signatures Authorization Form" and "certification" page.
20. Respondent also signed the application's "Agent's Report" page which certifies that "all proposed insureds ... [were] present during the completion of the application."
21. Sheets was not present during the completion of the application.
22. The application's "Bank Authorization" page established an automatic withdrawal from a checking account at FIGFCU, account number ending in 2197.
23. Sheets does not own, nor has she ever owned, a checking account at FIGFCU.
24. Respondent forged Sheets' signature six (6) pages of the application.
25. Sheets neither signed the application nor did she authorize anyone to sign the application on her behalf.
26. Sheets had no knowledge that Respondent submitted the application, nor did she authorize Respondent to submit the application on her behalf.

Unlawful Professional Discounts – Document Manipulation

27. Farmers offers a premium discount to individuals who hold certain professional licenses, such as teachers, engineers, doctors and nurses.
28. On at least seven (7) occasions, Respondent submitted false information to Farmers to obtain a "professional license discount" for customers.

29. Respondent obtained screen-shots from the Professional Licensing Agency's "Online Licensing" website.
30. Each original screen-shot displayed, in part, a nurse's name, address, and license information.
31. Respondent replaced the nurses' names with his customers' names, then submitted the altered screen-shots to Farmers along with the customers' applications.

Methamphetamine House – Document Manipulation

32. Respondent's client, Gary Cooper, sought to obtain coverage on a house located at 1117 W. North St. Kokomo, Indiana 46901.
33. However, in an "Order to Comply" letter dated December 28, 2011, the Howard County Health Department ("HCHD") deemed Cooper's house "unfit for human habitation."
34. The HCHD issued the order after receiving an Indiana State Police "Methamphetamine Laboratory Occurrence Report" ("Report"). The Report conveyed that the police seized an "Operational [Methamphetamine] Lab" from the residence.
35. Farmers does not issue policies to homeowners whose home contained an operational methamphetamine laboratory.
36. To obtain insurance for Cooper, Respondent altered the report to show that law enforcement seized "Chemical/Glassware/Equipment (only)."
37. Respondent submitted the altered Report along with Cooper's application.

Outstanding Tax Warrants

38. Based upon information and belief, Respondent has three (3) outstanding tax warrants issued against him in Howard County, Indiana for income tax liabilities totaling one thousand, seven

hundred fifteen and 46/100 dollars (\$1,715.46) for years 2004-2006, and Respondent has no repayment agreement in-place with the Indiana Department of Revenue for this liability.

COUNT I

39. Averments 1 through 38 are incorporated fully as if set forth herein.
40. Respondent forged another's name to documents related to an insurance transaction in violation of Ind. Code § 27-1-15.6-12(b)(10). Specifically, Respondent forged the initials of Dale Neubaum on an application for life insurance.

COUNT II

41. Averments 1 through 40 are incorporated fully as if set forth herein.
42. Respondent forged another's name to documents related to an insurance transaction in violation of Ind. Code § 27-1-15.6-12(b)(10). Specifically, Respondent forged the signature of Megan Sheets on an application for life insurance.

COUNT III

43. Averments 1 through 42 are incorporated fully as if set forth herein.
44. Respondent made himself the beneficiary of an insured, Sheets, in violation of Ind. Code § 27-1-15.6-31, which is cause for disciplinary action pursuant to Ind. Code § 27-1-15.6-12(b)(16).

COUNT IV

45. Averments 1 through 44 are incorporated fully as if set forth herein.
46. Respondent manipulated and submitted false documents to obtain professional discounts for at least seven (7) applicants in violation of Ind. Code § 27-1-15.6-12(b)(5).

COUNT V

47. Averments 1 through 46 are incorporated fully as if set forth herein.

48. Respondent manipulated and submitted a false document to obtain a homeowner policy for at least one (1) applicant in violation of Ind. Code § 27-1-15.6-12(b)(5).

COUNT VI

49. Averments 1 through 48 are incorporated fully as if set forth herein.

50. Respondent's conduct as alleged herein, constitutes fraudulent, coercive, or dishonest practices, and/or demonstrates incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Indiana in violation of Ind. Code § 27-1-15.6-12(b)(8).

COUNT VII

51. Averments 1 through 50 are incorporated fully as if set forth herein.

52. Respondent's failure to pay state income tax or to comply with a court order directing payment of state income tax is cause for disciplinary action pursuant to Ind. Code § 27-1-15.6-12(b)(14).

WHEREFORE, the Indiana Department of Insurance, by counsel, Adam H. Berry, requests that the Commissioner set this matter for a hearing, and/or issue an order permanently revoking Respondent's license, fining Respondent in the amount of ten thousand and 00/100 dollars (\$10,000.00) for each count, and granting the Department all other necessary and appropriate relief.

Respectfully submitted,



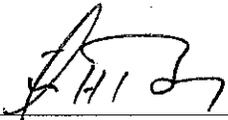
Adam H. Berry, #28215-49

Adam H. Berry
Indiana Department of Insurance
Enforcement Division
311 West Washington Street, Suite 103
Indianapolis, Indiana 46204-2787
Telephone: (317) 234-8279
Facsimile: (317) 232-5251

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served upon the following Respondent by United States first class mail, postage prepaid, this 28th day of November, 2012.

Ronald Eric Pierce
3702 South Reed Road, Suite A
Kokomo, Indiana 46902



Adam H. Berry