

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NUMBER: ~~5471~~-AG07-0627-155
5741

IN THE MATTER OF:)
)
Tod D. Owens)
8489 South 800 West)
Pendleton, IN 46064)
Respondent)
License No. 1745610)
)
Executive Escrow Co., Inc.)
8489 South 800 West)
Pendleton, IN 46064)
Respondent)
License No. 34619

FILED

OCT 14 2009

STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

FINAL ORDER

On September 3, 2009, the Administrative Law Judge, filed his Findings of Fact, Conclusions of Law and Recommended Order in the above-captioned matter.


1. The Department served Findings of Fact, Conclusions of law, and Recommended Order and Notice of Filing Recommended Order on Respondent by mailing the same to his home and business address.
2. The Department has complied with the notice requirements of Ind. Code §4-21.5-3-17.
3. Respondent has not filed an objection with the Commissioner regarding the Administrative Law Judge's Recommended Order, and more than eighteen (18) days have elapsed.

Therefore, the Commissioner of Insurance, being fully advised, now hereby adopts in full the Administrative Law Judge's Findings of Fact, Conclusions of Law, and Recommended Order and issues the following Final Order:

IT IS THEREFORE ORDERED by the Commissioner of Insurance:

1. Respondent Tod D. Owens resident producer license no. 1745610 is permanently revoked.
2. Respondent Executive Escrow Co., Inc. resident producer license no. 34619 is permanently revoked.
3. Respondent Owens is to pay a fine in the amount of ten thousand (\$10,000.00) dollars for each of the five (5) counts charged for a total fine of fifty thousand (\$50,000.00) dollars payable within ninety (90) days.
4. Respondent Executive is to pay a fine in the amount of ten thousand (\$10,000.00) dollars for each of counts one, two, and three charged for a total fine of thirty thousand (\$30,000.00) dollars payable within ninety (90) days.

ALL OF WHICH IS ORDERED by the Commissioner this 14 day of October, 2009.



Carol Cutter, Commissioner
Indiana Department of Insurance

Copies to:

Kathy Carr Hulbert, Attorney
Indiana Department of Insurance
311 West Washington Street, Suite 300
Indianapolis, IN 46240

Tod. D. Owens
Executive Escrow Co., Inc.
8489 South 800 West
Pendleton, IN 46064

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NUMBER: 5471-AG07-0627-155

IN THE MATTER OF:)

Tod D. Owens)
8489 South 800 West)
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Respondent)
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Executive Escrow Co., Inc.)
8489 South 800 West)
Pendleton, IN 46064)
Respondent)
License No. 34619)

FILED

SEP 03 2009

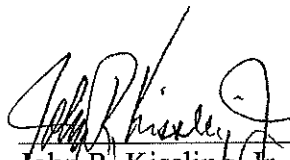
STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

NOTICE OF FILING OF RECOMMENDED ORDER

The parties of this action are hereby notified that the Administrative Law Judge's Findings of Fact, Conclusions of Law and Recommended Order are deemed filed as of this date.

To preserve an objection to this order for judicial review, you must object to the order in a writing that: 1) identifies the basis for your objection with reasonable particularity; and 2) is filed with the Commissioner of the Department of Insurance within eighteen (18) days from the date of this Order.



John R. Kissling, Jr.
Administrative Law Judge

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NUMBER: 5471-AG07-0627-155

IN THE MATTER OF:)

Tod D. Owens)
8489 South 800 West)
Pendleton, IN 46064)
Respondent)
License No. 1745610)

Executive Escrow Co., Inc.)
8489 South 800 West)
Pendleton, IN 46064)
Respondent)
License No. 34619)

FILED

SEP 03 2009

STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

FINDINGS OF FACT, CONCLUSIONS OF LAW
AND RECOMMENDED ORDER

Administrative Law Judge, John R. Kissling, Jr., having considered and reviewed all of the evidence, will now render a decision in the matter of Respondents Tod. D. Owens and Executive Escrow Co., Inc. ("Respondents"), which came to be heard on the 24th day of June, 2009 at 10:10 a.m. in the second floor conference room at the offices of the Indiana Department of Insurance (Department).

The Indiana Department of Insurance was represented by counsel, Kathy Hulbert. Respondent was not present and unrepresented by counsel. Witnesses testified under oath, evidence was heard, and exhibits were received into evidence.

Based upon the evidence presented at said hearing, the Administrative Law Judge now makes the following Findings of Fact and Conclusions of Law, and issues his Recommended Order as

follows:

FINDINGS OF FACT

1. Respondent Tod D. Owens ("Owens") has a resident title insurance producer license, license number 1745610. Owens is President of Executive Escrow Company, Inc.
2. Respondent Executive Escrow Company, Inc. ("Executive") is a licensed title insurance producer, license number 34619.
3. Respondents were properly notified of the hearing date and time by U.S. Certified Mail #7004 1160 0000 3840 3081.
4. The Department received a consumer complaint against Respondents from Doug Cotton, owner of Cambridge Construction, accompanied by a settlement statement described herein. The Respondents prepared this settlement statement on May 31, 2007 for the purpose of selling a property located at 13228 Mink Lane, Westfield, IN 46074 for Cambridge Construction, Inc., the seller, to Robert Edmonds, borrower. The settlement statement shows net proceeds payable to the seller in the amount of \$186,552.46. (Exhibit A).
5. Check number 5171, dated June 1, 2007, issued by Respondent Executive payable to Cambridge Construction in the amount of \$186,552.46 was returned for non-sufficient funds. (Exhibit B).
6. Respondent Executive was an agent for Pacific Northwest Title Insurance Company ("Pacific"). A market conduct examination on Pacific performed by the Department showed that all escrow funds were not properly accounted for or settled. There was evidence of unusual bank transfers and NSF bank fees. Evidence from the market conduct

examination indicates the Respondents used new settlement deposits to cover older settlement disbursements as account shortages were often noted. As a result of Respondents, Pacific: suffered net direct losses in 2007 in the amount of \$105,903.00; paid open claims of \$543,000.00 in 2008; failed to receive premiums due from Executive of approximately \$191,000.00. (Exhibit C).

7. A case summary of a criminal docket in Madison County Court II showed that on or about April 22, 2008 that Respondent Owens was charged with one count of D felony theft. A jury trial is set for August 25, 2009. To date Respondent Owens has not informed the Department of this charge. (Exhibit D).
8. A pleading filed in Hamilton County Circuit/Superior Court was filed August 15, 2008 charging Respondent Owens with two (2) counts of fraud on a financial institution a Class C felony. A jury trial is set for October of 2009. To date Respondent Owen has not informed the Department of these charges. (Exhibit E).

CONCLUSIONS OF LAW

1. The Commissioner of Insurance has jurisdiction over both the subject matter and the parties to this action.
2. This hearing was held in compliance with the Administrative Orders and Procedures Act of the Indiana Code.
3. The Commissioner has the discretionary authority to revoke the Respondent Owens and Respondent Executive's license to sell insurance and to fine Respondents.
4. Service of process was completed via the use of the United States Mail in compliance with the statute and due process requirements.

5. Respondents violated Indiana Code 27-1-4-15.6-12(b)(4), when a licensee is found to have misappropriated or converted any monies or properties received in the course of doing insurance business.
6. Respondents violated Indiana Code 27-1-4-15.6-12(b)(8) by permitting their escrow account to be overdrawn, failing to record consumer documents, and failing to issue insurance policies.
7. Respondent Owens violated Indiana Code 27-1-15.6-17(b) by failing to notify the Department of criminal charges within thirty (30) days.
8. The Department has met its burden in showing by a preponderance of the evidence that Respondent Owens and Respondent Executive's conduct is contrary to the Indiana Insurance Code and that disciplinary action to include revocation of Respondents license is in order.
9. Findings of Fact that can be adopted as Conclusions of Law are hereby incorporated herein as such.

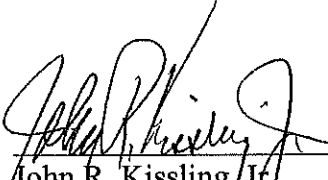
RECOMMENDED ORDER

With the Findings of Fact and the Conclusions of Law as stated, the Administrative Law Judge now recommends to the Commissioner of Insurance the following:

1. Respondent Tod D. Owens resident producer license no. 1745610 shall be permanently revoked.
2. Respondent Executive Escrow Co., Inc. resident producer license no. 34619 shall be permanently revoked.

3. Respondent Owens shall pay a fine in the amount of ten thousand (\$10,000.00) dollars for each of the five (5) counts charged for a total fine of fifty thousand (\$50,000.00) dollars payable within ninety (90) days of the Commissioners Final Order.
4. Respondent Executive shall pay a fine in the amount of ten thousand (\$10,000.00) dollars for each of counts one, two, and three charged for a total fine of thirty thousand (\$30,000.00) dollars payable within ninety (90) days of the Commissioners Final Order.

ALL OF WHICH IS ADOPTED by the Administrative Law Judge and recommended to the Commissioner this 3RD day of September, 2009.



John R. Kissling, Jr.
Administrative Law Judge

Distribution:

Kathy Carr Hulbert, Attorney
Indiana Department of Insurance
311 West Washington Street, Suite 300
Indianapolis, IN 46240

Tod. D. Owens
Executive Escrow Co., Inc.
8489 South 800 West
Pendleton, IN 46064

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NO. 5471-AG07-0627-155

IN THE MATTER OF:)

Tod D. Owens,)
Indiana Insurance License No. 1745610)
8489 South 800 West)
Pendleton, IN 46064)

Respondent,)

Executive Escrow Company, INC.,)
Indiana Insurance License No. 34619)
8489 South 800 West)
Pendleton, IN 46064)

Respondent.)

FILED

APR 09 2009

STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

AMENDED STATEMENT OF CHARGES

The Title Division of the Indiana Department of Insurance ("the Department"), pursuant to the Indiana Orders and Procedures Act, Indiana Code 4-21.5-1-1 *et seq.*; and Indiana Code 27-1-15.6-12, hereby gives notice to Respondent Todd D. Owens ("Owens") and Executive Escrow Company, INC ("Executive Escrow") of the following amended charges:

PARTIES AND JURISDICTION

1. Owens is a licensed resident title insurance producer, duly licensed by the State of Indiana, holding license number 1745610.
2. Executive Escrow is a licensed resident title insurance producer, duly licensed by the State of Indiana, holding license number 34619.

3. The Commissioner has jurisdiction over the licenses of insurance producers and has the authority to levy a civil penalty, place an insurance producer on probation, suspend an insurance producer's license, revoke an insurance producer's license for a period of years, permanently revoke an insurance producer's license, order restitution, or refuse to issue or renew an insurance producer license, or take any combination of these actions against an insurance producer pursuant to Indiana Code 27-1-15.6-12.

FACTS

4. On or about June 14, 2007, the Department received a consumer complaint regarding the Respondents and initiated an investigation.
5. The consumer complaint regarded a real estate transaction where on or about May 31, 2007, Doug Cotton ("Cotton") of Cambridge Construction Company, sold a property located at 13228 Mink Lane, Westfield, Indiana 46074 ("Mink Lane") to Robert Edmonds.
6. Owens and Executive Escrow provided the settlement services and title insurance for the foregoing transaction.
7. The HUD-1 Settlement Statement ("HUD-"), prepared and signed by Owens, showed a disbursement of one hundred eighty-six thousand five hundred fifty-two dollars and forty-six cents (\$186,552.46) to be paid to Cotton.
8. On or about June 1, 2007, Owens and Executive Escrow issued a check (check number 5171) to Cotton in the amount of one hundred eighty-six thousand five hundred fifty-two dollars and forty-six cents (\$186,552.46),

which was drawn on the Executive Escrow Company INC. Escrow Account.

This check was signed by Owens.

9. On or about June 6, 2007, Cotton received notice from his bank that the check written on Executive Escrow's escrow account was being returned for non-sufficient funds.
10. During the time between Cotton depositing the check and receiving notice from his bank that the check didn't clear, Cotton wrote several checks to employees and for other reasons that bounced because the Executive Escrow check didn't clear.
11. The progression of events has caused severe harm and consternation to Cotton and his employees, who received payroll checks that also bounced.
12. Cotton has incurred hundreds of dollars in bank charges and fees as a result of the bounced check issued by Owens and Executive Escrow.
13. The Department's investigation of Cotton's consumer complaint also uncovered a myriad of warranty deeds and mortgages that Owens and Executive Escrow failed to file in the local county recorder's office.
14. Owens and Executive Escrow also failed to issue final title policies for several consumers and lenders where insurance premium was paid for the policies but did not receive title insurance policies.
15. On or about April 22, 2008, Owens was criminally charged in Anderson, Indiana with one count of D Felony Theft (IC 35-43-4-2(A)). Owens failed to notify the Department of this criminal charge.

16. On or about August 15, 2008, Owens was criminally charged in Hamilton County, Indiana with two counts of Fraud on a Financial Institution (IC 35-43-5-8(a)(1)), both Class C Felonies.
17. These charges allege that Owens falsified HUD-1's on transactions that he closed on September 2, 2006 and September 29, 2006.
18. Owens failed to notify the Department of the criminal charges that he is facing.

COUNT I

Misappropriation of Another's Money in the Course of Insurance Business

19. Averments 1 through 18 are repeated and incorporated by reference herein.
20. Owens and Executive Escrow violated IC 27-1-4-15.6-12(b)(4), which provides for penalties when a licensee is found to have misappropriated or converted any monies or properties received in the course of doing insurance business when Respondents did not have enough money in their escrow account to cover Cotton's proceeds from the Mink Lane closing.

COUNT II

Financial Irresponsibility

21. Averments 1 through 18 are repeated and incorporated by reference herein.
22. Respondents permitted their escrow account to be overdrawn in violation of IC 27-1-4-15.6-12(b)(8), which provides penalties when there has been a finding that Respondents engaged in dishonest practices, demonstrated

incompetence, untrustworthiness or financial responsibility in the conduct of business in Indiana or elsewhere.

COUNT III

Demonstration of Incompetence or Untrustworthiness

23. Averments 1 through 18 are repeated and incorporated by reference herein.
24. Respondents failed to record consumer documents and failed to issue consumers insurance policies in violation of IC 27-1-15.6-12(b)(8), which provides for penalties when there has been a finding that Respondents engaged in dishonest practices, demonstrated incompetence, untrustworthiness or financial responsibility in the conduct of business in Indiana or elsewhere.

COUNT IV & V

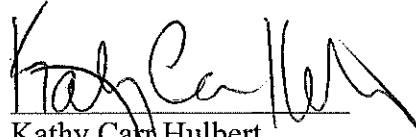
Reports of Criminal Prosecutions Against Producers

25. Averments 1 through 18 are repeated and incorporated by reference herein.
26. Owens failed to notify the Department of the criminal charges failed against him on both April 22, 2008 and August 15, 2008 within thirty days in violation of IC 27-1-15.6-17(b), an insurance law. Penalties for violating an insurance law are codified in IC 27-1-15.6-12.

WHEREFORE, the Department, by counsel, Kathy Carr Hulbert, requests that the Commissioner permanently revoke the Respondents' licenses, order Owens to pay restitution to Doug Cotton for the bank fees and penalties Cotton incurred as a result of

the bounced check, fine each of the Respondents ten thousand dollars (\$10,000.00) per count and all other just and proper relief in the premises.

Respectfully submitted,



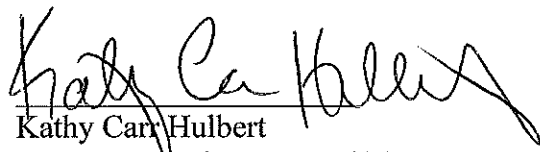
Kathy Carl Hulbert,
Attorney Number 23529-49A

Indiana Department of Insurance
311 W. Washington Street, Suite 300
Indianapolis, IN 46204
(317) 234-5151- telephone
kahulbert@idoi.in.gov

CERTIFICATE OF SERVICE

This is to certify that a copy of the Statement of Charges has been served upon the Respondents in the captioned proceeding by depositing a copy of same in the United States mail, postage prepaid, this 8th day of April, 2009.

Tod D. Owens
Executive Escrow Company, Inc.
8489 South 800 West
Pendleton, IN 46064



Kathy Carl Hulbert
Attorney Number 23529-49A

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NO. 5471-AG07-0627-155

IN THE MATTER OF:)

Tod D. Owens,)
Indiana Insurance License No. 1745610)
8489 South 800 West)
Pendleton, IN 46064)

Respondent,)

Executive Escrow Company, INC.,)
Indiana Insurance License No. 34619)
8489 South 800 West)
Pendleton, IN 46064)

Respondent.)

FILED

OCT 23 2007

STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

ORDER GRANTING EMERGENCY SUSPENSION

The Indiana Commissioner of Insurance, having reviewed the Title Insurance Division's Oral Motion for Emergency Suspension, and being otherwise duly advised, now finds as follows:

Findings of Fact

1. The Department of Insurance is authorized to regulate the practice of insurance producers in Indiana under Indiana Code §27-1-15.6, which was effective at all times relevant to these charges.

2. The Department may hold disciplinary hearings under Indiana Code 27-1-15.6.

3. Respondents currently hold title insurance qualifications in Indiana.
4. Respondents have allegedly misappropriated a substantial, unknown sum of money from their title insurance escrow account.
5. At an administrative hearing regarding the above-named Respondents held on October 16, 2007, the State orally requested that the Deputy Commissioner and Administrative Law Judge, John R. Kissling, Jr. recommend to the Commissioner that the motion be granted.
6. On October 16, 2007, the Deputy Commissioner and Administrative Law Judge, John R. Kissling, Jr. made a recommendation that the insurance producer licenses of Tod D. Owens and Executive Escrow Company, Inc be suspended on an emergency basis on the court record.
7. It appears that Respondents plan to continue selling insurance, thereby placing them in a position of trust with consumers and their funds.

Conclusions of Law

1. An emergency exists in that Respondents plan to continue selling insurance, thereby placing them in a position of trust with consumers and their funds.
2. In an emergency, the Commissioner may issue appropriate orders without notice or an evidentiary proceeding under Indiana Code 4-21.5-4-2(a) which states in relevant part:

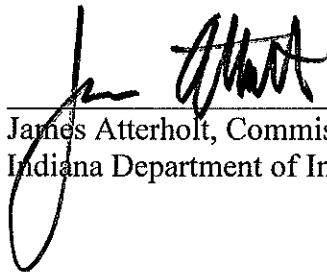
The agency shall issue the order under this chapter by one (1) of the following procedures:

- (1) Without notice or an evidentiary proceeding, by any authorized individual or panel of individuals.

ORDER

It is, therefore, ORDERED, that the Indiana insurance licenses of Tod D. Owens and Executive Escrow Company, Inc. are hereby SUSPENDED pursuant to Indiana Code §4-21.5-4-2 for 90 days commencing on the date this order is issued.

The Respondents are hereby notified of their right to a hearing concerning this order as quickly as practicable under Indiana Code §4-21.5-4-4.


James Atterholt, Commissioner
Indiana Department of Insurance

Distribution to:

Tod D. Owens
8489 South 800 West
Pendleton, IN 46064

SENT BY CERTIFIED MAIL NO.: 7004 1160 0000 3841 8153
RETURN RECEIPT REQUESTED

Executive Escrow Company, Inc.
8489 South 800 West
Pendleton, IN 46064

SENT BY CERTIFIED MAIL NO.: 7004 1160 0000 3841 8160
RETURN RECEIPT REQUESTED

Kathy Hulbert, Attorney
Attorney # 23529-49A
Title Enforcement Division
Indiana Department of Insurance
311 W. Washington St.
Indianapolis, IN 46402

STATE OF INDIANA)
)
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NO. 5471-AG07-0627-155

IN THE MATTER OF:

Tod D. Owens,
Indiana Insurance License No. 1745610
8489 South 800 West
Pendleton, IN 46064

Respondent,

Executive Escrow Company, INC.,
Indiana Insurance License No. 34619
8489 South 800 West
Pendleton, IN 46064

Respondent.

FILED
JUN 28 2007
STATE OF INDIANA
DEPT. OF INSURANCE

Type of Agency Action: Enforcement

STATEMENT OF CHARGES

The Title Division of the Indiana Department of Insurance ("the Department"), pursuant to the Indiana Orders and Procedures Act, Indiana Code 4-21.5-1-1 *et seq.*; and Indiana Code 27-1-15.6-12, hereby gives notice to Respondent Todd D. Owens ("Owens") and Executive Escrow Company, INC ("Executive Escrow") of the following charges:

FACTS

1. Owens is a licensed resident title insurance producer, duly licensed by the State of Indiana, holding license number 1745610.
2. Executive Escrow is a licensed resident title insurance producer, duly licensed by the State of Indiana, holding license number 34619.

3. On or about May 31, 2007, Doug Cotton ("Cotton") of Cambridge Construction Company, sold a property located at 13228 Mink Lane, Westfield, Indiana 46074 ("Mink Lane") to Robert Edmonds.
4. Owens and Executive Escrow provided the settlement services and title insurance for the foregoing transaction.
5. The HUD-1, prepared and signed by Owens, showed a disbursement of one hundred eighty-six thousand five hundred fifty-two dollars and forty-six cents (\$186,552.46) to be paid to Cotton.
6. On or about June 1, 2007 Owens and Executive Escrow issued a check (check number 5171) to Cotton in the amount of one hundred eighty-six thousand five hundred fifty-two dollars and forty-six cents (\$186,552.46), which was drawn on the Executive Escrow Company INC. Escrow Account. This check was signed by Owens.
7. On or about June 6, 2007 Cotton received notice from his bank that the check written on Executive Escrow's escrow account was being returned for non-sufficient funds.
8. During the time between Cotton depositing the check and receiving notice from his bank that the check didn't clear, Cotton wrote several checks to employees and for other reasons that bounced because the Executive Escrow check didn't clear.
9. The progression of events has caused severe harm and consternation to Cotton and his employees, who received payroll checks that also bounced.

10. Cotton has incurred hundreds of dollars in bank charges and fees as a result of the bounced check issued by Owens and Executive Escrow.
11. The Commissioner has jurisdiction over the licenses of insurance producers and has the authority to levy a civil penalty, place an insurance producer on probation, suspend an insurance producer's license, revoke an insurance producer's license for a period of years, permanently revoke an insurance producer's license, order restitution, or refuse to issue or renew an insurance producer license, or take any combination of these actions against an insurance producer pursuant to Indiana Code 27-1-15.6-12.

COUNT I

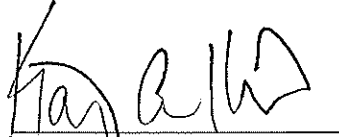
12. Averments 1 through 11 are repeated and incorporated by reference herein.
13. Owens and Executive Escrow violated IC 27-1-4-15.6-12(b)(4), which prohibits misappropriating and converting any monies or properties received in the course of doing insurance business when there was not enough money in their escrow account to cover Cotton's proceeds from the Mink Lane closing.
14. Under Indiana Code 27-1-15.6-12(b), the Commissioner has the authority to levy a civil penalty of up to ten thousand dollars (\$10,000), order restitution, suspend or revoke a producer's insurance license or place a producer on probation for a violation of subsection (b)(4). Indiana Code 27-1-15.6-12 (m) allows the Commissioner to order a licensee to make restitution if the Commissioner finds that the licensee has committed a violation in subsection (b)(4).

COUNT II

15. Averments 1 through 11 are repeated and incorporated by reference herein.
16. Owens and Executive Escrow violated IC 27-1-4-15.6-12(b)(8), which prohibits dishonest practices, demonstrating incompetence, untrustworthiness or financial responsibility in the conduct of business in Indiana or elsewhere when there was not enough money in their escrow account to cover Cotton's proceeds from the Mink Lane closing.
17. Under Indiana Code 27-1-15.6-12(b), the Commissioner has the authority to levy a civil penalty of up to ten thousand dollars (\$10,000), order restitution, suspend or revoke a producer's insurance license or place a producer on probation for a violation of subsection (b)(8). Indiana Code 27-1-15.6-12 (m) allows the Commissioner to order a licensee to make restitution if the Commissioner finds that the licensee has committed a violation in subsection (b)(8).

WHEREFORE, the Department, by counsel, Kathy Hulbert, requests that the Commissioner revoke the Respondents' licenses, order restitution to Doug Cotton in the amount of one hundred eighty-six thousand five hundred fifty-two dollars and forty-six cents (\$186,552.46) for the proceeds of the sales an undetermined amount at the time of this filing for the bank fees and penalties Cotton incurred as a result of the bounced check and fine each of the Respondents ten thousand dollars (\$10,000.00) per count for a total of twenty thousand dollars (\$20,000.00) per Respondent and all other just and proper in the premises.

Respectfully submitted,

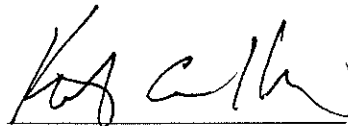


Kathy Carr Hulbert,
Attorney Number 23529-49

Indiana Department of Insurance
311 W. Washington Street, Suite 300
Indianapolis, IN 46204
(317) 232-2422- telephone
(317) 232-5251- facsimile
kahulbert@idoi.in.gov

CERTIFICATE OF SERVICE

This is to certify that a copy of the Statement of Charges has been served upon the Respondents in the captioned proceeding by depositing a copy of same in the United States mail, postage prepaid, this 28th day of June, 2007.



Kathy Carr Hulbert
Attorney Number 23529-49