

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NUMBER: 8545-AG11-0808-103

IN THE MATTER OF:)

Global Partners, Ltd.)
d/b/a Jim Clark Retirement)
8200 Haverstick Road, Suite 102)
Indianapolis, IN 46240-2491)

License No.: 624305)

James C. Clark, III)
8200 Haverstick Road, Suite 102)
Indianapolis, IN 46240)

No License)

Kevin Keith Brown)
3773 Shelborne Ct.)
Carmel, IN 46032)

License No.: 574844)

Type of Action: Enforcement)

FILED

AUG 09 2011

STATE OF INDIANA
DEPT. OF INSURANCE

ORDER GRANTING

EMERGENCY CEASE AND DESIST ORDER

The Commissioner of the Indiana Department of Insurance (“Commissioner”), having reviewed the Enforcement Division’s Motion for Emergency Cease and Desist Order, and being otherwise duly advised, now finds as follows:

FINDINGS OF FACT

1. The Department of Insurance (“Department”) is authorized to regulate the practice of insurers and producers in Indiana under Indiana Code 27-1 et seq.

2. The Department may hold disciplinary hearings in accordance with Indiana Code 4-21.5-3 and 4.

3. Respondents are not now, nor have they ever been, authorized to sell, solicit or negotiate insurance under the assumed business name of Jim Clark Retirement.

4. The Department has received numerous complaints against Respondents. The most recent complaint indicates Respondents are selling, soliciting and/or negotiating insurance to Indiana residents using an unregistered assumed name.

CONCLUSIONS OF LAW

5. An emergency exists in that Respondents continue to sell, solicit or negotiate insurance under the unregistered assumed name and in violation of Indiana Code 27-1-15.6-10.

6. An emergency exists in that Indiana citizens are in danger of being misled as to the actual name of the entity.

7. Further, an emergency exists in that Respondent Clark, an unlicensed individual, is selling, soliciting or negotiating insurance through Respondent Global d/b/a Jim Clark Retirement.

8. In an emergency, the Commissioner may issue appropriate orders without notice or an evidentiary proceeding under Indiana Code 4-21.5-4-2(a).

ORDER

It is, therefore, ORDERED, that Respondents must CEASE AND DESIST from holding themselves out as Jim Clark Retirement, or otherwise transacting insurance business in Indiana as Jim Clark Retirement, or otherwise violating in any way the insurance laws of Indiana.

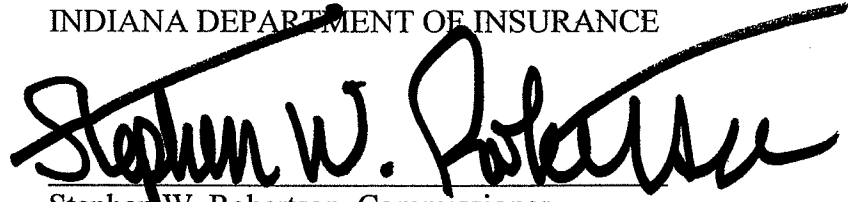
It is further ORDERED that Respondent Clark must CEASE AND DESIST from selling, soliciting or negotiating insurance without a license.

It is further ORDERED that the website www.jimclarkretirement.com be disabled within ten (10) days of this Order.

Pursuant to Indiana Code 4-21.5-4-2, this order remains effective for 90 days commencing on the date this order is issued.

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.

INDIANA DEPARTMENT OF INSURANCE



Stephen W. Robertson, Commissioner

Distribution to:

Nikolas P. Mann, Attorney
Indiana Department of Insurance
311 W. Washington St., Suite 103
Indianapolis, IN 46402

Global Partners, Ltd.
8200 Haverstick Rd., Ste 102
Indianapolis, IN 46240-2491

James C. Clark, III
8200 Haverstick Rd., Suite 102
Indianapolis, IN 46240-2491

Kevin Keith Brown
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STATE OF INDIANA
DEPT. OF INSURANCE

MOTION FOR EMERGENCY CEASE AND DESIST ORDER

The Enforcement Division of the Indiana Department of Insurance, pursuant to Indiana Code 4-21.5-4, Indiana Code 27-1-34-1 et seq. and Indiana Code 27-4-5 et seq., files its Motion for an Emergency Cease and Desist Order against Global Partners, Ltd. d/b/a Jim Clark Retirement ("Global"), James C. Clark, III ("Clark") and Kevin Keith Brown ("Brown") (hereafter known collectively as "Respondents") and states:

1. Respondent Global is a licensed resident insurance producer holding license number 624305.

2. Respondent Clark is not a licensed insurance producer in Indiana. Clark is listed as the registered agent for Respondent Global with the Indiana Secretary of State. Clark is also listed on the website www.jimclarkretirement.com as the founder, chairman and CEO of Jim Clark Retirement.

3. Respondent Brown is a licensed resident insurance producer holding license number 574844. Brown is the Qualifying Active Officer for Respondent Global with the Department. Brown is also listed as a principal and incorporator for Respondent Global with the Indiana Secretary of State.

4. ~~The Department received information that Respondent Global is hosting a website~~ named www.jimclarkretirement.com wherein *Guaranteed, Safe Annuities* and *Private Retirement Plans* were being offered by Jim Clark Retirement.

5. A review of the website indicates Jim Clark Retirement is the assumed business name under which Respondent Global does business.

6. A review of Respondent Global's Indiana insurance producer license record does not indicate the Department has been properly notified of the assumed business name as required by Indiana Code 27-1-15.6-10 prior to its use.

7. An emergency exists in that Respondents are selling, soliciting or negotiating insurance products to Indiana insurance consumers in violation of Indiana Code 27-1-15.6-10 and are using an unregistered, unauthorized assumed business name.

8. Further, an emergency exists in that Respondent Clark, an unlicensed individual, is selling, soliciting or negotiating insurance through Respondent Global d/b/a Jim Clark Retirement.

WHEREFORE, the Enforcement Division requests that the Commissioner issue an
Emergency Cease and Desist Order against Respondents under Indiana Code 4-21.5-4-2, and for
all other necessary and proper relief.



Nikolas P. Mann, #26665-29
Enforcement Division

Indiana Department of Insurance
311 West Washington Street, Suite 103
Indianapolis, IN 46204-2787
(317) 232-2385-telephone
(317) 232-5251-facsimile

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served upon Respondents listed below by
United States first class mail, postage prepaid, this 9th day of August, 2011.

Global Partners, Ltd.
8200 Haverstick Rd., Ste 102
Indianapolis, IN 46240-2491

James C. Clark, III
8200 Haverstick Rd., Suite 102
Indianapolis, IN 46240-2491

Kevin Keith Brown
3773 Shelborne Ct.
Carmel, IN 46032



Nikolas P. Mann, #26665-29
Enforcement Division