

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

**BEFORE THE INDIANA
COMMISSIONER OF INSURANCE**

CAUSE NO.: 24614-AG25-1104-107

IN THE MATTER OF:)

Doxa E&S Solutions, LLC)
101 E. Washington Blvd., Fl. 10)
Fort Wayne, IN 46802)

Respondent.)

Type of Agency Action: Enforcement)

License Number: 3251618)

FILED

DEC 01 2025

**STATE OF INDIANA
DEPT. OF INSURANCE**

FINAL ORDER

The Indiana Department of Insurance ("Department"), by counsel Victoria Hastings, and Doxa E&S Solutions, LLC ("Respondent"), a nonresident insurance producer organization licensed to do business in Indiana, signed an Agreed Entry which purports to resolve all issues involved in the above captioned cause number, and which has been submitted to the Commissioner of Insurance (the "Commissioner") for approval.

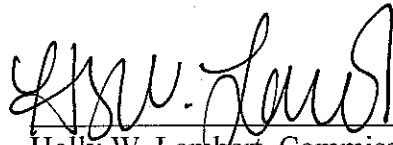
The Commissioner, after reviewing the Agreed Entry, which levies a one hundred ten thousand dollar (\$110,000) civil penalty for improperly applying surcharges to certificates, finds it has been entered into fairly and without fraud, duress or undue influence, and is fair and equitable between the parties. 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 as follows:

1. Respondent shall pay a civil penalty in the amount of one hundred ten thousand dollars (\$110,000) to the Department within thirty (30) days of the date of this Final Order.
2. Failure to timely pay the civil penalty may result in the Department taking further action against Respondent's license.

12/1/25

Date Signed



Holly W. Lambert, Commissioner
Indiana Department of Insurance

Distribution:

Doxa E&S Solutions, LLC
C/O: Amy L. Beard, Esq.
101 E. Washington Blvd., Fl. 10
Fort Wayne, IN 46802

Victoria Hastings, Attorney
Indiana Department of Insurance
311 W. Washington St., Suite 103
Indianapolis, IN 46204

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STATE OF INDIANA
DEPT. OF INSURANCE

AGREED ENTRY

This Agreed Entry is executed by the Indiana Department of Insurance ("Department"), by counsel, Victoria Hastings, and Doxa E&S Solutions, LLC ("Respondent"), a nonresident insurance producer organization licensed to do business in Indiana, to resolve all issues in the above captioned matter. This Agreed Entry is subject to the review and approval of Holly W. Lambert, Commissioner, Indiana Department of Insurance ("Commissioner").

WHEREAS, Respondent is a nonresident insurance producer organization holding license number 3251618 since June 26, 2017;

WHEREAS, Respondent also holds a nonresident independent adjuster license number 3843494, which was issued on October 14, 2022 and expires on October 21, 2026, as well as a nonresident surplus lines license number 3250322 issued on June 21, 2017 and expires on June 30, 2027;

WHEREAS, in December 2022, Respondent acquired substantially all of the assets of Bradshaw Insurance Group, Inc. ("BIG") and its subsidiaries – Insurance Program Administrators,

Inc., Northwoods Insurance, Inc., and Transportation Insurors, Inc. ("TI") – and retained the former President of BIG and its subsidiaries, Stacy Bradshaw, to continue leading the business;

WHEREAS, following the acquisition, Respondent learned for the first time from a BIG employee of an improper surcharging practice being performed by BIG and Respondent took immediate action to discontinue, investigate, and remediate such practice;

WHEREAS, only after having an employee identify improper surcharges and expressly explaining the application thereof on various quote worksheets and quotes, was it possible for the impropriety of the surcharges to be identified;

WHEREAS, at no time during Respondent's due diligence process prior to the acquisition referenced above, would it have been possible for Respondent to identify the practice absent an express explanation of the surcharges and their intent;

WHEREAS, Respondent's investigation revealed that Ms. Bradshaw and Tammy Sheely, the then-sales leader of the BIG business, directed the practice;

WHEREAS, Respondent's investigation identified that, from approximately September 2022 through October 2024, there were 24 certificates, all of which were issued under a master policy issued in Indiana and held by an Indiana non-profit corporation, that applied the improper surcharges and 47 quotes were provided with the improper surcharge but not bound;

WHEREAS, Respondent's investigation confirmed that the improper surcharges were the result of a discriminatory directive by Ms. Bradshaw and Ms. Sheely based on the perceived ethnicity of the Applicants derived from the Applicants' last name;

WHEREAS, the total dollar amount of the improper surcharges was \$3,493.12 (ranging from the highest surcharge being added at \$350 to the lowest at \$4.11);

WHEREAS, Respondent proactively and on its own initiative implemented corrective measures as a result of their investigation, including the following:

- a) fully refunding all improperly surcharged amounts to all affected certificate holders;
- b) immediately discontinuing the improper surcharging practice and reconfiguring all ratings for the TI program to avoid any similar future issues;
- c) placing Ms. Bradshaw and Ms. Sheely on administrative leave while the investigation was pending and ultimately terminating both employees; and
- d) implementing internal controls to avoid similar issues and providing supplemental training and directions regarding permissible surcharging practices;

WHEREAS, in April 2025, Respondent proactively self-reported this matter to the Department and has fully cooperated with the Department's investigation and resolution of this matter;

WHEREAS, Indiana Code § 27-1-15.6-12(b)(2)(A) states, in part, that the Commissioner may levy a civil penalty against an insurance producer organization for violating an insurance law;

WHEREAS, Indiana Code § 27-4-1-4(a)(7)(C) is an insurance law which states, in part, that it is an unfair and deceptive business practice to make or permit excessive or inadequate charges for premiums, policy fees, assessments, or rates, or making or permitting any unfair discrimination between persons of the same class involving essentially the same hazards in the amount of premiums, policy fees, assessments, or rates charged or made for policies or contracts of any kind of insurance;

WHEREAS, Kevin Wall, as President of Doxa E&S Solutions, LLC is authorized to act on behalf of Respondent and obligate it to perform in accordance with this agreement; and

WHEREAS, the Department and Respondent (collectively, "the Parties") desire to resolve this matter without a hearing.

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

1. The Commissioner has jurisdiction over the subject matter and the Parties to this Agreed Entry.
2. In order to avoid formal litigation in this matter, Respondent has determined that it is in their best interests to enter into this Agreed Entry. As such, Respondent acknowledges that they execute this Agreed Entry with full realization of its contents and effects.
3. This Agreed Entry is executed knowingly, voluntarily, and freely by the Parties. The Parties agree that the terms of this Agreed Entry constitute final resolution of this matter.
4. Respondent knowingly, voluntarily and freely waives the right to a public hearing on this matter, including the right to appear in person before the Commissioner, present evidence, cross-examine witnesses, and present arguments.
5. Respondent knowingly, voluntarily and freely waives the right to judicial review of this matter or otherwise appeal or challenge the validity of this Agreed Entry.
6. Respondent knowingly, voluntarily, and freely waives, releases, and forever discharges all claims or challenges, known or unknown, against the Department, its Commissioner, employees, agents, and representatives, in their individual and official capacities, that arise out of or are related to the Agreed Entry or Final Order,

including but not limited to any act or omission as part of the underlying audit, investigation, negotiation, or approval process.

7. Respondent shall pay a civil penalty in the amount of one hundred ten thousand dollars (\$110,000) to the Department within thirty days (30) after the Commissioner signs the Final Order approving this Agreed Entry. Failure to timely pay the civil penalty may result in the Department taking another administrative action against Respondent.
8. Respondent has carefully read and examined this Agreed Entry and fully understands its terms.
9. Respondent has had the opportunity to have this Agreed Entry reviewed by legal counsel of their choosing, at their own expense, and is aware of the benefits gained and obligations incurred by the execution of this Agreed Entry. Respondent understands and agrees that the Department cannot give them legal advice.
10. Respondent has entered into this Agreed Entry knowingly, voluntarily, and freely, and has not been subject to duress, coercion, threat, or undue influence.
11. This Agreed Entry constitutes the entire agreement between the Parties, and no other promises or agreements, express or implied, have been made by the Department or by any employee, director, agent or other representative thereof to induce Respondent to enter this Agreed Entry.
12. The Department agrees to accept Respondent's compliance with the terms of this Agreed Entry as full satisfaction of this matter, and warrants and represents that so long as Respondent complies with the terms of this Agreed Entry, the Department

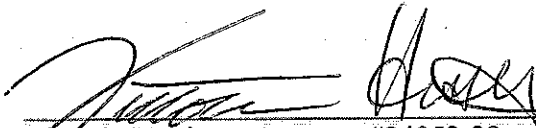
will not bring any further action against Respondent based on the facts that gave rise to this Agreed Entry.

13. In the event the Department finds there has been a breach of any of the provisions of this Agreed Entry, the Department may reopen this matter and pursue alternative action pursuant to Indiana Code § 27-1-15.6-12.
14. Respondent waives any applicable statute of limitations for purposes of any enforcement of the terms and conditions of this Agreed Entry.
15. Respondent acknowledges that this Agreed Entry may be admitted into evidence in any judicial or administrative proceeding against Respondent to enforce the terms and conditions contained herein.
16. Respondent understands that this Agreed Entry resolves only the matter pending with the Department and does not affect any criminal prosecution or civil litigation by any agency other than the Department that may be pending or hereinafter commence against Respondent.
17. This Agreed Entry does not in any way affect the Department's authority in future audits, investigations, examinations, negotiations, or other complaints involving Respondent except as provided in paragraph 12, above.
18. It is expressly understood that this Agreed Entry is subject to the Commissioner's acceptance and has no force or effect until such acceptance is evidenced by the entry of a Final Order by the Commissioner.
19. Should this Agreed Entry not be accepted by the Commissioner, it is agreed that (i) this Agreed Entry shall be void *ab initio* and no provision of this Agreed Entry shall have any force or effect, (ii) consideration of, or agreement to, this Agreed Entry shall

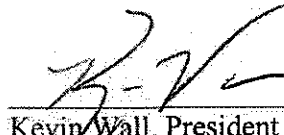
not be used against Respondent in any way, and (iii) presentation to, and consideration of this Agreed Entry by the Commissioner, shall not unfairly or illegally prejudice the Commissioner or Respondent from further participation in or resolution of these proceedings.

20. If this Agreed Entry is accepted by the Commissioner, it will become part of Respondent's permanent record and may be considered in future actions brought by the Department or any other regulator against Respondent. It is further understood that, if accepted by the Commissioner, this Agreed Entry and resulting Final Order are public records pursuant to Indiana Code § 4-21.5-3-32 that may not be sealed or otherwise withheld from the public, and may be reported to the National Association of Insurance Commissioners and published on the Department's website as required.
21. Respondent acknowledges that this is an Administrative Action that they may be required to report to other jurisdictions in which they are licensed and on future licensing applications.

11/24/2025
Date Signed


Victoria Hastings, Attorney #34052-29
Indiana Department of Insurance

11/20/2025
Date Signed


Kevin Wall, President
Doxa E&S Solutions, LLC, Respondent

STATE OF INDIANA)
) SS:
COUNTY OF ALLEN)

Before me a Notary Public for Allen County, State of Indiana,
personally Kevin Wall, on behalf of Doxa E&S Solutions, LLC 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 20th day of November, 2025.



SARAH WHITE, Notary Public
Allen County, State of Indiana
Commission Number NP0727083
My Commission Expires June 4, 2028

Signature [Handwritten Signature]
Printed Sarah White

My Commission expires: June 4, 2028
County of Residence: Allen