

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

BEFORE THE INDIANA
COMMISSIONER OF INSURANCE

CAUSE NO.: 25041-AG26-0526-080

IN THE MATTER OF:)

UPsource PEO, Corp.)
5300 E Mountain View Cir.)
Edmond, OK 73034)

Respondent.)

Type of Agency Action: Enforcement)

Registration Number: Unregistered)

FILED

JUL 02 2026

STATE OF INDIANA
DEPT. OF INSURANCE

EMERGENCY CEASE AND DESIST ORDER

The Commissioner of the Indiana Department of Insurance, 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. UPsource PEO, Corp. ("Respondent") is an Oklahoma domestic corporation holding an active professional employer organization registration with the Oklahoma Insurance Department.
2. Respondent has at no time held a professional employer organization registration with the Indiana Department of Insurance.
3. Respondent provided professional employer organization services in Indiana by processing payroll on behalf of its client, Behold Business Intelligence, Inc., trade named Repify Ai, for an Indiana resident employee.

4. Respondent advertises itself and otherwise holds itself out as a professional employer organization in Indiana via its website: <https://www.upsourcepeo.com>.

CONCLUSIONS OF LAW

1. The Commissioner of the Indiana Department of Insurance is authorized to regulate the practices of professional employer organizations in Indiana under Indiana Code § 27-16 *et seq.*
2. Indiana Code § 27-16-4-1 provides that a corporation shall not provide professional employer services; advertise that the corporation is a professional employer organization or provides professional employer services; or otherwise hold itself out as a professional employer organization in Indiana unless the corporation is registered in Indiana.
3. Pursuant to Indiana Code §§ 4-21.5-4-1(1) and 4-21.5-4-2(a)(1), the Commissioner may issue appropriate orders without notice or an evidentiary proceeding in an emergency.
4. An emergency exists in that Respondent acts as a professional employer organization in Indiana, and advertises or otherwise holds itself out as a professional employer organization in Indiana, without having registered with the Indiana Department of Insurance, which violates Indiana insurance law and is harmful to Indiana consumers.
5. This Emergency Order satisfies the requirements of Indiana Code § 4-21.5-4-2(b).

ORDER

It is **ORDERED** that Respondent, UPsource PEO, Corp., must immediately cease and desist from acting as a professional employer organization in Indiana, and immediately cease and desist from advertising or otherwise holding itself out as a professional employer

organization in Indiana. This Order shall remain in effect as allowed by Indiana Code § 4-21.5-4-5(3).

Under Indiana Code § 4-21.5-4-3, this Emergency Order is effective when issued.

Respondent has the right to request a hearing on this Emergency Order by filing a request for a hearing, and if requested, an evidentiary hearing will be set on the matter as soon as practicable pursuant to Indiana Code § 4-21.5-4-4.

July 2, 2026
Date Signed

Holly W. Lambert
Holly W. Lambert, Commissioner
Indiana Department of Insurance

Distribution:

UPsource PEO, Corp.
5300 E Mountain View Cir.
Edmond, OK 73034

Joseph Bossinger, Attorney
ATTN: Jessica Feiock, Investigator
Indiana Department of Insurance
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**STATE OF INDIANA
DEPT. OF INSURANCE**

MOTION FOR EMERGENCY CEASE AND DESIST ORDER

Comes now the Enforcement Division of the Indiana Department of Insurance ("Department") and files its Motion for an Emergency Cease and Desist Order against UPsource PEO, Corp. ("Respondent") and states:

1. Respondent is an Oklahoma domestic corporation, formed on January 22, 2020, with the Oklahoma Secretary of State, and reports its location as 5300 E Mountain View Cir., Edmond, Oklahoma.
2. Respondent holds active professional employer organization registration number 510478736 with the Oklahoma Insurance Department, becoming effective on March 23, 2020.
3. Respondent has at no time held a professional employer organization registration with the Indiana Department of Insurance.
4. The Department possesses substantial, credible evidence that Respondent acts as a professional employer organization in Indiana, and advertises or otherwise holds itself

out as a professional employer organization in Indiana.

5. Respondent operates a website which states, "We serve businesses in every state except California." *Our Services*, UPsource PEO, <https://www.upsourcepeo.com/services>
6. Respondent disclosed to the Indiana Department of Workforce Development that Respondent processed payroll on behalf of its client, Behold Business Intelligence, Inc., trade named Repify Ai, for an Indiana resident employee.
7. Indiana Code § 27-16-4-1 provides that a corporation shall not provide professional employer services; advertise that the corporation is a professional employer organization or provides professional employer services; or otherwise hold itself out as a professional employer organization in Indiana unless the corporation is registered in Indiana.
8. Indiana Code §§ 4-21.5-4-1(1) and 4-21.5-4-2(a)(1) authorize an agency to conduct proceedings without notice or an evidentiary proceeding if an emergency exists.
9. An emergency exists in that Respondent provided professional employer organization services in Indiana, and advertises or otherwise holds itself out as a professional employer organization in Indiana without having registered with the Indiana Department of Insurance.

WHEREFORE, the Enforcement Division requests that the Commissioner issue an Emergency Cease and Desist Order against Respondent under Indiana Code § 4-21.5-4-2(a)(1), and for all other necessary and proper relief.

Respectfully requested,

/s/Joseph Bossinger

Joseph Bossinger, Attorney #35166-49
Enforcement Division

Indiana Department of Insurance

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon Respondent at the address listed below by United States Postal Service first class mail the same day as filing.

UPsource PEO, Corp
5300 E Mountain View Cir.
Edmond, OK 73034

/s/Joseph Bossinger
Joseph Bossinger #35166-49