

**STATE OF MICHIGAN  
DEPARTMENT OF ENERGY, LABOR & ECONOMIC GROWTH  
OFFICE OF FINANCIAL AND INSURANCE REGULATION**

**Before the Commissioner of Financial and Insurance Regulation**

In the matter of:

**Ravishankar B. Bhooplapur**  
System ID No. 096405

**Enforcement Case No. 08-5604**

Respondent  
\_\_\_\_\_ /

**CONSENT ORDER AND STIPULATION**

Issued and entered  
on December 17<sup>th</sup>, 2009  
by **Stephen R. Hilker**  
Chief Deputy Commissioner

**I.**

**FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. At all pertinent times involved herein, Ravinshankar B. Bhooplapur (“Respondent”) was a licensed nonresident producer authorized to conduct business of insurance in the State of Michigan under a policy of insurance.
2. As a licensed insurance producer, Respondent knew or had reason to know that Section 1239(1)(h) of the Insurance Code (“Code”), MCL 500.1239(1)(h), provides, “The commissioner may place on probation, suspend, revoke ... an insurance producer’s license or may levy a civil fine under section 1244 or any combination of actions for ... [u]sing fraudulent, coercive, or dishonest practices or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in this state or elsewhere.”
3. Respondent has failed to uphold the standards as described below.
4. Prior to October 4, 2007, Respondent was employed by AXA Equitable Life Insurance Company (“AXA”).
5. During the month of September 2007, Respondent provided copies of a Client Account Record (“CAR form”) concerning a client to aid AXA in an arbitration proceeding that resulted from a complaint filed by the client. The CAR form was sent to AXA’s Internal Audit Department (“IAD”) for review.

6. IAD subsequently reviewed the CAR forms available at Respondent's office. During IAD's examination of the forms, IAD found a 2002 CAR form identical to the above-mentioned client's CAR form, which was submitted to AXA's litigation counsel to assist counsel with the arbitration proceeding. The CAR form found in Respondent's office was significantly different from the CAR form Respondent submitted to AXA's litigation counsel. The most notable differences between the forms were that the CAR form submitted to AXA's litigation counsel did not have a client signature, and it appeared that the form was altered to reflect the personal information of the client.
7. IAD also found a copy of another client's CAR form in Respondent's shredder. The shredded pieces found appeared to have been altered using whiteout.
8. By manipulating the foregoing CAR forms, Respondent is in violation of Section 1239(1)(h) of the Code, MCL 500.1239(1)(h).


**II.  
ORDER**

Based upon the Findings of Fact and Conclusions of Law above and Respondent's stipulation, the Commissioner **ORDERS** that:

1. Respondent shall CEASE and DESIST from operating in such a manner as to violate Section 1239(1)(h) of the Code, MCL 500.1239(1)(h), including manipulating and/or altering his clients' forms and/or documents for any reason(s).
2. Respondent shall pay to the State of Michigan a civil fine of \$1,000. Upon execution of this Order, the Office of Financial and Insurance Regulation will send Respondent an invoice for payment of the civil fine, which shall be due within 30 days of issuance of the invoice.
3. Upon execution of this Order, Respondent shall be placed on probation for one year. If Respondent fails to pay the fine and/or is found to be in violation of the State's insurance laws during the probationary period, his nonresident producer license will be immediately revoked without any further disciplinary proceedings.

**IT IS SO ORDERED.**

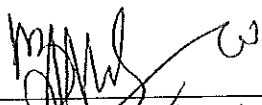
Dated: December 11, 2009

  
**Stephen R. Hilker**  
Chief Deputy Commissioner

**III.  
STIPULATION**

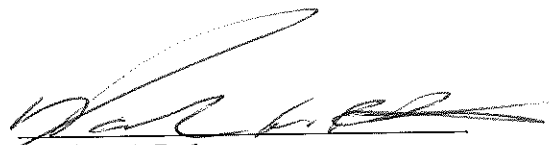
Respondent has read and understands the Consent Order above. Respondent agrees that the Chief Deputy Commissioner has jurisdiction and authority to issue this Consent Order pursuant to the Michigan Insurance Code. Respondent waives the right to a hearing in this matter if this Consent Order is issued. Respondent understands that the Consent Order and Stipulation will be presented to the Chief Deputy Commissioner for approval and the Chief Deputy Commissioner may or may not issue this Consent Order. Respondent waives any objection to the Commissioner deciding this case following a hearing in the event the Consent Order is not approved. Respondent admits to the Findings of Fact and Conclusions of Law set forth in the above Consent Order, and agree to the entry of the Consent Order. Respondent also agrees to waive his right to a hearing in the event he fails to pay the fine as ordered by the Chief Deputy Commissioner or violates the insurance code during his probationary period.

Dated: 11/27/09

  
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Ravishankar B. Bhooplapur

The Office of Financial and Insurance Regulation staff approves this stipulation and recommends that the Chief Deputy Commissioner issue the above Consent Order.

Dated: 12/8/08

  
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Marlon F. Roberts  
Staff Attorney