

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

Before the Commissioner of the Office of Financial and Insurance Regulation

In the matter of:

Enforcement Case No. 09-7330

Jalbert Financial Group, LLC,

Russell K. Jalbert and

Eugene Wittstock.

Respondents.

_____ /

CONSENT ORDER

WHEREAS, the Office of Financial and Insurance Regulation ("OFIR") conducted an investigation of Jalbert Financial Group, LLC ("JFG"), Russell K. Jalbert ("Jalbert") and Eugene Wittstock ("Wittstock") and determined that JFG, Jalbert and Wittstock have offered and sold securities as defined in Section 401 of the Uniform Securities Act of 1964, 1964 PA 265, as amended, (the "Uniform Securities Act"), MCL 451.801; and

WHEREAS, on September 11, 2009, JFG and Jalbert entered into a consent order with OFIR; and

WHEREAS, Wittstock has cooperated with regulators conducting the investigations by responding to inquiries, providing documentary evidence and other materials, and immediately halting further offers and sales; and

WHEREAS, Wittstock, as part of this settlement, agrees to make certain payments; and

WHEREAS, Wittstock neither admits nor denies the Findings of Fact and Conclusions of Law, but has agreed to resolve the investigation relating to offers and sales of unregistered securities through this Consent Order (the "Order") in order to avoid protracted and expensive proceedings; and

WHEREAS, Wittstock, as evidenced by the authorized signature on the consent to the Order below, admits the jurisdiction of OFIR, voluntarily consents to the entry of this Order and elects to permanently waive any right to a hearing and appeal under the Administrative Procedures Act of 1969, 1969 PA 306, as amended, MCL 24.201 *et seq.*, ("APA"), and the Uniform Securities Act with respect to this Order;

NOW, THEREFORE, the Chief Deputy Commissioner of OFIR, as authorized under the Uniform Securities Act, hereby enters this Order:

BACKGROUND AND FINDINGS OF FACT

1. Wittstock is a Michigan resident who is also a licensed resident producer agent with qualifications to transact business in accident, health, life, variable annuities, and variable contracts. System ID No. 0161313. During the relevant time periods, Wittstock held an insurance agency appointment with JFG.
2. In November 2008, OFIR issued a Cease and Desist Order against Diversified Lending Group, Inc. ("DLG") to cease and desist from selling unregistered, nonexempt securities in the State of Michigan in violation of the MUSA.
3. In June 2009, OFIR opened an investigation of the business activities of JFG, Jalbert and Wittstock. In response to an inquiry from OFIR, DLG furnished information showing that from 2007 - 2008 JFG, Jalbert and Wittstock were effecting the purchase and sale of DLG securities.
4. According to DLG's response to OFIR's inquiry, DLG was engaged in the acquisition and operation of income producing real estate, real estate lending, insurance premium financing strategies, financial service brokerage business and private investment pools. DLG acknowledged that it conducted certain business through its wholly-owned subsidiary, Applied Equities, Inc. ("AEI"). AEI contracted with Your Platinum Distributors Insurance Marketing Co., ("YPD"), a Texas corporation and wholesaler of annuity, life insurance, and investment products. YPD, in turn, contracted with insurance agents, whom DLG authorized to represent

DLG to the insurance agent's existing clients. The insurance agents, including Wittstock, then solicited investments ranging from \$50,000 to \$250,000. According to DLG, the DLG products were designed to be shown only to the insurance agent's existing clients, whom the agent knew to be accredited investors and appropriate candidates. OFIR also obtained documentation of Wittstock's sales and commissions in response to a subpoena.

5. Wittstock received several thousand dollars in commissions from YPD.
6. Wittstock was not registered as securities agent pursuant to the MUSA.
7. OFIR staff conducted a search to locate records of any agent registration or exemption filings pursuant to the MUSA relating to JFG and Wittstock. No such records were found.

CONCLUSIONS OF LAW

1. The DLG investments sold to Michigan residents are securities, as defined by Section 401(z) of the Uniform Securities Act, MCL 451.801(z).
2. Wittstock sold DLG securities and was not registered with OFIR in violation of Section 201 of the Uniform Securities Act, MCL 451.601.

ORDER

IT IS HEREBY ORDERED:

1. Wittstock shall immediately **CEASE AND DESIST** from violating Section 201 of the Act, MCL 451.601.
2. Wittstock shall pay the sum of \$5,000 to the State of Michigan. Upon execution of this Order, OFIR will send Respondent an Invoice for this fine that is payable in 25 monthly installments of \$200 per month.
3. This Order concludes the investigation by OFIR of any and all allegations contained within the August 6, 2009, Cease and Desist Order and any other action based upon

those allegations that OFIR could commence under the Uniform Securities Act on behalf of the State of Michigan as it relates to Wittstock up to and including any activity through June 1, 2009.

4. This Order is entered into solely for the purpose of resolving the referenced investigation, and is not intended to be used for any other purpose, and its findings and conclusions shall not constitute admissions on the part of Wittstock for any purpose. Wittstock is prohibited, however from taking any action, publicly or privately, creating the impression that the violations are without factual basis and failure to comply with this prohibition constitutes a material default of this Order. However, nothing in this paragraph affects Wittstock's: (1) testimonial obligations; or (2) right to take legal or factual positions in litigation or other legal proceedings in which OFIR is not a party.

5. If payment is not made by Wittstock, or if Wittstock defaults in any of his obligations set forth in this Order, OFIR may vacate this Order, at its sole discretion, upon 10 days notice to Wittstock without opportunity for administrative hearing, and commence separate action.

6. For any person or entity not a party to this Order, this Order does not limit or create any private rights or remedies against Wittstock, does not limit or create liability of Wittstock or limit or create defenses of Wittstock to any claims.


7. Nothing herein shall preclude the State of Michigan, its departments, agencies, boards, commissions, authorities, political subdivisions and corporations (collectively, "State Entities"), other than OFIR, from asserting any claims, causes of action, or applications for compensatory, nominal and/or punitive damages, administrative, civil, criminal, or injunctive relief against Wittstock in connection with unregistered securities sales.

9. This Order and any dispute related thereto shall be construed and enforced in accordance with, and governed by, the laws of the State of Michigan without regard to any choice of law principles.

10. This Order shall be binding upon Wittstock and his successors and assigns as well as to successors and assigns of relevant affiliates with respect to all conduct subject to the provisions above and all future obligations, responsibilities, undertakings, commitments, limitations, restrictions, events, and conditions.

11. That the Order to Cease and Desist entered and issued on August 6, 2009, against Wittstock is hereby DISMISSED.

Dated this 15 day of October, 2009.




Eugene Wittstock

BY ORDER OF THE COMMISSIONER OF THE OFFICE
OF FINANCIAL AND INSURANCE REGULATION

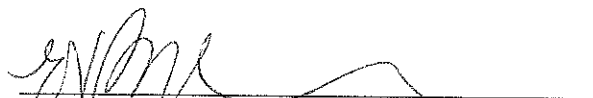


Stephen R. Hilker
Chief Deputy Commissioner

Order Approved as to Form:



Bradley J. Schram, Esq.
Hertz Schram, PC



Elizabeth V. Bolden, Staff Attorney
Office of Financial and Insurance Regulation

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

Before the Commissioner of the Office of Financial and Insurance Regulation

In the matter of:

Enforcement Case No. 09-7166

7330

Jalbert Financial Group, LLC,

Russell K. Jalbert and

Eugene Wittstock.

Respondents.

_____ /

CONSENT ORDER

WHEREAS, the Office of Financial and Insurance Regulation ("OFIR") conducted an investigation of Jalbert Financial Group, LLC ("JFG") and Russell K. Jalbert ("Jalbert") and determined that JFG and Jalbert have offered and sold securities as defined in Section 401 of the Uniform Securities Act of 1964, 1964 PA 265, as amended, (the "Uniform Securities Act"), MCL 451.801; and

WHEREAS, JFG and Jalbert have cooperated with regulators conducting the investigations by responding to inquiries, providing documentary evidence and other materials, and immediately halting further offers and sales; and

WHEREAS, JFG and Jalbert, as part of this settlement, agree to make certain payments;
and

WHEREAS, JFG and Jalbert neither admit nor deny the Findings of Fact and Conclusions of Law, but have agreed to resolve the investigation relating to offers and sales of unregistered

securities through this Administrative Consent Order (the "Order") in order to avoid protracted and expensive proceedings; and

WHEREAS, JFG and Jalbert, as evidenced by the authorized signature on the consent to the Order below, admit the jurisdiction of OFIR, voluntarily consent to the entry of this Order and elect to permanently waive any right to a hearing and appeal under the Administrative Procedures Act of 1969, 1969 PA 306, as amended, MCL 24.201 *et seq.*, ("APA"), and the Uniform Securities Act with respect to this Order;

NOW, THEREFORE, the Chief Deputy Commissioner of OFIR, as authorized under the Uniform Securities Act, hereby enters this Order:

BACKGROUND AND FINDINGS OF FACT

1. Respondent Jalbert Financial Group, LLC, (herein "JFG") is a Michigan limited liability company whose principle place of business is located at 40 Oak Hollow, Ste. 340, Southfield, MI 48033. Jalbert Financial is a Michigan licensed insurance resident producer agency with qualifications to transact business in accident, health, life, and variable annuities. System ID No. 0084964.

2. Respondent Russell K. Jalbert (herein "Jalbert") is a Michigan resident who is also a licensed resident producer agent with qualifications to transact business in accident, health, life, variable annuities, and variable contracts. System ID No. 0025419. He is the president of Jalbert Financial. During the relevant time periods, Jalbert held an agency appointment with Jalbert Financial.

3. Jalbert Financial and Jalbert are hereinafter referred to as the Respondents.

4. In November 2008, OFIR issued a Cease and Desist Order against Diversified Lending Group, Inc. ("DLG") to cease and desist from selling unregistered, nonexempt securities in the State of Michigan in violation of the MUSA.

5. In June 2009, OFIR opened an investigation of the Respondents' business activities. In response to inquiry from OFIR, DLG furnished information showing that from 2007 - 2008 the Respondents were effecting the purchase and sale of DLG securities.

6. According to DLG's response to OFIR's inquiry, DLG was engaged in the acquisition and operation of income producing real estate, real estate lending, insurance premium financing strategies, financial service brokerage business and private investment pools. DLG acknowledged that it conducted certain business through its wholly-owned subsidiary, Applied Equities, Inc. ("AEI"). AEI contracted with Your Platinum Distributors Insurance Marketing Co., ("YPD"), a Texas corporation and wholesaler of annuity, life insurance, and investment products. YPD, in turn, contracted with insurance agents, whom DLG authorized to represent DLG to the insurance agent's existing clients. The insurance agents, such as Respondents, then solicited investments ranging from \$50,000 to \$250,000. According to DLG, the DLG products were designed to be shown only to the insurance agent's existing clients, whom the agent knew to be accredited investors and appropriate candidates. OFIR also obtained documentation of the Respondents' sales and commissions paid to them in response to a subpoena.

7. Jalbert Financial received several thousand dollars in commissions from YPD.

8. Respondent Jalbert received several thousand dollars in commissions from YPD.

9. The Respondents were not registered as securities agents pursuant to the MUSA.

10. OFIR staff conducted a search to locate records of any agent registration or exemption filings pursuant to the MUSA in the matter of Jalbert Financial and Jalbert. No such records were found.

CONCLUSIONS OF LAW

1. The DLG investments sold to Michigan residents are securities, as defined by Section 401(z) of the Uniform Securities Act, MCL 451.801(z).

2. Respondents sold DLG securities and were not registered with OFIR in violation of Section 201 of the Uniform Securities Act, MCL 451.601.

ORDER

IT IS HEREBY ORDERED:

1. Respondents shall immediately **CEASE AND DESIST** from violating Section 201 of the Act, MCL 451.601.

2. Respondent Jalbert Financial Group, LLC, shall pay the sum of \$2,000 to the State of Michigan.

3. Respondent Russell Jalbert, shall pay the sum of \$3,000 to the State of Michigan.

4. This Order concludes the investigation by OFIR of any and all allegations contained within the August 6, 2009 Cease and Desist Order and any other action based upon those allegations that OFIR could commence under the Uniform Securities Act on behalf of the State of Michigan as it relates to JFG and Jalbert, up to and including any activity through June 1, 2009.

5. This Order is entered into solely for the purpose of resolving the referenced investigation, and is not intended to be used for any other purpose, and its findings and conclusions shall not constitute admissions on the part of JFG and Jalbert for any purpose. The Respondents are prohibited, however from taking any action, publically or privately, creating the

impression that the violations are without factual basis and failure to comply with this prohibition constitutes a material default of this Order. However, nothing in this paragraph affects Respondents': (1) testimonial obligations; or (2) right to take legal or factual positions in litigation or other legal proceedings in which OFIR is not a party.

6. If payment is not made by JFG and Jalbert, or if JFG and Jalbert default in any of their obligations set forth in this Order, OFIR may vacate this Order, at its sole discretion, upon 10 days notice to JFG and Jalbert and without opportunity for administrative hearing, and commence separate action.

7. For any person or entity not a party to this Order, this Order does not limit or create any private rights or remedies against JFG and Jalbert, does not limit or create liability of JFG and Jalbert, or limit or create defenses of JFG and Jalbert to any claims.

8. Nothing herein shall preclude the State of Michigan, its departments, agencies, boards, commissions, authorities, political subdivisions and corporations (collectively, "State Entities"), other than OFIR, from asserting any claims, causes of action, or applications for compensatory, nominal and/or punitive damages, administrative, civil, criminal, or injunctive relief against JFG and Jalbert in connection with unregistered securities sales.

9. This Order and any dispute related thereto shall be construed and enforced in accordance with, and governed by, the laws of the State of Michigan without regard to any choice of law principles.

10. This Order shall be binding upon JFG and Jalbert and its successors and assigns as well as to successors and assigns of relevant affiliates with respect to all conduct subject to the provisions above and all future obligations, responsibilities, undertakings, commitments, limitations, restrictions, events, and conditions.

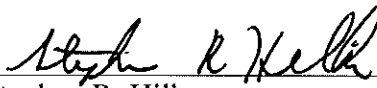
11. That the Order to Cease and Desist entered and issued on August 6, 2009, against Russell K. Jalbert and Jalbert Financial Group, LLC, is hereby DISMISSED.

Dated this 11 day of September, 2009.



Russell K. Jalbert, on behalf of himself
And Jalbert Financial Group, LLC

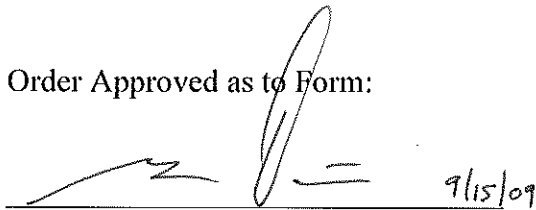
BY ORDER OF THE COMMISSIONER OF THE OFFICE
OF FINANCIAL AND INSURANCE REGULATION




9/18/09

Stephen R. Hilker
Chief Deputy Commissioner

Order Approved as to Form:



George B. Donnini, Shareholder
Butzel Long, a professional corporation



Elizabeth V. Bolden, Staff Attorney
Office of Financial and Insurance Regulation

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

Before the Commissioner of the Office of Financial and Insurance Regulation

In the matter of:

Enforcement Case No. 09-7166

Jalbert Financial Group, LLC,

Russell K. Jalbert and

Eugene Wittstock.

Respondents.

Issued and entered
this 6th day of August 2009
by Stephen R. Hilker
Chief Deputy Commissioner

ORDER TO CEASE AND DESIST

The Commissioner of the Office of Financial and Insurance Regulation ("OFIR"), pursuant to his statutory authority and responsibility to administer and enforce the Michigan Uniform Securities Act ("MUSA"), 1964 PA 265, MCL 451.501 *et seq.*, hereby orders **JALBERT FINANCIAL GROUP, LLC, RUSSELL K. JALBERT and EUGENE WITTSTOCK** to immediately **CEASE AND DESIST** from engaging in the business of effecting or attempting to effect purchases or sales of securities. Respondents are also notified of an opportunity to request a hearing on this matter.

I.

BACKGROUND AND FINDINGS OF FACT

1. Respondent Jalbert Financial Group, LLC, (herein "Jalbert Financial") is a Michigan limited liability company whose principle place of business is located at 40 Oak Hollow, Ste. 340, Southfield, MI 48033. Jalbert Financial is a Michigan licensed insurance resident producer agency with qualifications to transact business in accident, health, life, and variable annuities. System ID No. 0084964.

2. Respondent Russell K. Jalbert (herein “Jalbert”) is a Michigan resident who is also a licensed resident producer agent with qualifications to transact business in accident, health, life, variable annuities, and variable contracts. System ID No. 0025419. He is the president of Jalbert Financial. During the relevant time periods, Jalbert held an agency appointment with Jalbert Financial.
3. Respondent Eugene J. Wittstock (herein “Wittstock”) is a Michigan resident who is also a licensed resident producer agent with qualifications to transact business in accident, health, life, and variable annuities. System ID No. 0161313. During the relevant time periods, Wittstock held an agency appointment with Jalbert Financial.
4. Jalbert Financial, Jalbert and Wittstock are hereinafter referred to as the Respondents.
5. In November 2008, OFIR issued a Cease and Desist Order against Diversified Lending Group, Inc. (“DLG”) to cease and desist from selling unregistered, nonexempt securities in the State of Michigan in violation of the MUSA.
6. In June 2009, OFIR opened an investigation of the Respondents’ business activities. In response to inquiry from OFIR, DLG furnished information showing that from 2007 - 2008 the Respondents were agents of DLG for the purpose of effecting the purchase and sale of DLG securities.
7. According to DLG’s response to OFIR’s inquiry, DLG was engaged in the acquisition and operation of income producing real estate, real estate lending, insurance premium financing strategies, financial service brokerage business and private investment pools. DLG acknowledged that it conducted certain business through its wholly-owned subsidiary, Applied Equities, Inc. (“AEI”). AEI contracted with Your Platinum Distributors Insurance Marketing Co., (“YPD”), a Texas corporation and wholesaler of annuity, life insurance, and investment products. YPD, in turn, contracted with insurance agents, whom DLG authorized to represent DLG to the insurance agent’s existing clients. The insurance agents, such as Jalbert Financial, Jalbert and Wittstock, then solicited investments ranging from \$50,000 to \$250,000. According to DLG, the DLG products were designed to be shown only to the insurance agent’s existing clients, whom the agent knew to be accredited investors and appropriate candidates. OFIR also obtained documentation of the Respondents’ sales and commissions paid to them in response to a subpoena.
8. According to Respondents Jalbert and Wittstock, Jalbert Financial received at least \$28,000 in commissions paid from YPD. These commissions were paid from the sale of DLG securities.
9. According to Respondent Jalbert, he admitted to OFIR that he sold DLG securities and he received at least \$40,000 in commissions from YPD. These commissions were paid from the sale of DLG securities.

10. According to Respondent Wittstock, he admitted to OFIR that he sold DLG securities and he received at least \$60,000 in commissions from YPD. These commissions were paid from the sale of DLG securities.
11. The Respondents were not registered as securities agents pursuant to the MUSA. Respondents Jalbert and Wittstock admitted that they did not possess a securities agent registration to sell DLG securities in Michigan.
12. OFIR staff conducted a search to locate records of any agent registration or exemption filings pursuant to the MUSA in the matter of Jalbert Financial, Jalbert and Wittstock. No such records were found.

II.

CONCLUSIONS OF LAW

WHEREAS, Section 201(a), of the MUSA, MCL 451.601(a), provides that a person may not transact business in this state as an agent unless registered under this act, or exempt.

WHEREAS, Section 401(c), MCL 451.801(c), defines an agent to mean any individual other than a broker-dealer who represents a broker-dealer or issuer in effecting or attempting to effect purchases or sales of securities.

WHEREAS, Section 402(c) of the Act, MCL 451.802(c), provides that in any proceeding under this act, the burden of proving an exemption or an exception from a definition is upon the person claiming it; and,

WHEREAS, Respondents failed to offer sufficient proof pursuant to Section 402(c) that Respondents were exempted from registration.

WHEREAS, Section 408 of the Act, MCL 451.808, states that whenever it appears to the Administrator (Commissioner of the Office of Financial and Insurance Regulation) that any person has engaged or is about to engage in any act or practice constituting a violation of any provision of this Act or any rule or order hereunder, it may in its discretion issue a cease and

desist order or bring an action in a circuit court to enjoin the acts or practices and to enforce compliance with this Act or any rule or order hereunder; and

WHEREAS, Respondents offered and sold securities to Michigan residents, and

WHEREAS, the Respondents were compensated in the form of commissions for their selling efforts,

WHEREAS, the Respondents acted as unregistered agents in violation of the MUSA, MCL 451.601, 201(a).

WHEREAS, the Administrator finds this Order necessary and appropriate in the public interest, for the protection of investors, and consistent with the purposes fairly intended by the policy and provisions of the Act; and

WHEREAS, the Administrator retains the right to pursue further administrative action against Respondents should the Administrator determine that such action is necessary and appropriate in the public interest, for the protection of investors, and consistent with the purposes fairly intended by the policy and provisions of the Act; and

WHEREAS, based on the foregoing, OFIR Staff recommends that the Administrator find that Respondents have engaged in acts and practices that violate Section 201 of the Act, MCL 451.601.

III.

ORDER

IT IS THEREFORE ORDERED, pursuant to Section 408 of the Act, MCL 451.808, and Section 409 of the Act, MCL 451.809, that:

1. Respondents shall immediately **CEASE AND DESIST** from violating Section 201 of the Act, MCL 451.601.

2. Based upon Respondents' violations of the Act and because the Administrator finds that it would be in the public interest, any exemptions under Section 402(a)(1), (6), (7), (8), (9), (10), and 402(b) of the Act, MCL 451.802(a)(1), (6), (7), (8), (9), (10), and 451.802(b) for which Respondents might qualify, are hereby summarily denied or revoked for all purposes provided under Section 408(c) of the Act, MCL 451.808(c) including but not limited to Respondents' right to engage in transactions otherwise exempt under Section 402(b) of the Act, MCL 451.802(b) in the future absent compliance with the registration provisions of the Act.
3. Respondent Jalbert Financial Group, LLC, shall pay a civil fine of \$2,000. Upon issuance and entry of this Cease and Desist Order, OFIR will send an Invoice to Respondent and Respondent shall pay the fine by the due date printed on the Invoice.
4. Respondent Russell Jalbert, shall pay a civil fine of \$3,000. Upon issuance and entry of this Cease and Desist Order, OFIR will send an Invoice to Respondent and Respondent shall pay the fine by the due date printed on the Invoice.
5. Respondent Eugene Wittstock, shall pay a civil fine of \$10,000. Upon issuance and entry of this Cease and Desist Order, OFIR will send an Invoice to Respondent and Respondent shall pay the fine by the due date printed on the Invoice.

IT IS FURTHER ORDERED that Respondents' failure to comply with the terms of this ORDER may subject them to sanctions, fines, and/or penalties, including but not limited to the following:

- (a) The imposition of additional civil penalties of not more than \$1,000 for each violation of this Act, not to exceed a total of \$10,000; and/or
- (b) Pursuant to Section 409 of the Act, MCL 451.809, any willful violation of certain provisions of the Act shall, upon conviction, result in a fine of not more than \$25,000 for each violation, or imprisonment for not more than 10 years, or both.

IV.

NOTICE OF OPPORTUNITY FOR HEARING

Section 408(b) of the MUSA, MCL 451.808, provides:

A person who has been ordered to cease and desist may file with the administrator within **15 days** after service on him or her of the order a written request for a hearing. The administrator within 15 days after the filing shall issue a notice of hearing and set a date for the hearing. If a hearing is not requested by the person or is not ordered by the administrator within 15 days, the order will stand as entered. The administrator shall hold the hearing in accordance with the

administrative procedures act of 1969, Act No. 306 of the Public Acts of 1969, as amended, being sections 24.201 to 24.328 of the Michigan Compiled Laws, and shall have all the powers granted thereunder. The administrator shall issue a decision sustaining, modifying, or dismissing the original order.

Should Respondents wish to request a hearing relating to the Chief Deputy Commissioner's Order to Cease and Desist, a hearing must be requested in writing within 15 days of the issuance of this Order. The request for a hearing must be addressed to:

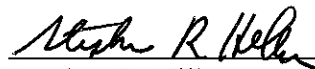
Dawn Kobus, Hearings Coordinator
Office of Financial and Insurance Regulation
Ottawa State Office Building, Third Floor
611 West Ottawa Street
Lansing, Michigan 48933

Please be advised that any statements made are voluntary and may be used in any proceeding that may be held. If a hearing is requested, Respondents have the right at its expense to legal representation at the hearing. A licensed attorney must represent Respondents that are corporations or limited liability companies.

The Commissioner retains the right to pursue further administrative action against the Respondents should the Commissioner determine that such action is necessary and appropriate in the public interest, for the protection of consumers, and consistent with the purposes fairly intended by the policy and provisions of the Act.

Any other communication regarding this Order should be addressed to the Office of Financial and Insurance Regulation, Attention: Tracy Janousek, P.O. Box 30220, Lansing, Michigan 48909, Telephone: (517) 373-7199.

**OFFICE OF FINANCIAL AND
INSURANCE REGULATION**



Stephen R. Hilker
Chief Deputy Commissioner