

**STATE OF MICHIGAN  
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES**

**Before the Director of the Department of Insurance and Financial Services**

In the matter of:

**Rand Sre**  
System ID. No. 0789307

**Enforcement Case No. 25-18346**

**Peak Title of Michigan Inc.**  
System ID No. 0145915

**Tobby Rae Jablonski**  
System ID. No. 0799576

**Peak Title Agency Co.**  
System ID. No. 0115856

Respondents.

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**Issued and entered  
on July 1, 2025,  
by Anita G. Fox  
Director**

**ORDER FOR SUMMARY SUSPENSION OF INSURANCE PRODUCER LICENSES AND  
NOTICE OF OPPORTUNITY FOR HEARING**

Pursuant to Section 92(2) of the Administrative Procedures Act, MCL 24.292(2), and Section 1242(4) of the Michigan Insurance Code (Code), MCL 500.1242(4), and the attached FINDINGS OF FACT AND CONCLUSIONS OF LAW that demonstrate the necessity for emergency action in order to protect the public health, safety, and welfare:

**IT IS THEREFORE ORDERED THAT:**

1. All State of Michigan insurance licenses currently held by Respondents Peak Title of Michigan, Peak Title Agency Co., Rand Sre, and Tobby Rae Jablonski (collectively "Respondents") are **SUMMARILY SUSPENDED**.
2. A copy of this Order shall be immediately served upon Respondents. This Order shall be effective upon the date of service.
3. Respondents have 30 calendar days after the service of this Order to contest it by requesting a hearing. Any request for a hearing should be addressed to:

**The Department of Insurance and Financial Services,  
Attention: Randie Swinson, Hearings Coordinator,  
P.O. Box 30220, Lansing, MI 48909-7720  
or faxed to 517-284-8851.**

4. If requested by Respondents a hearing on this matter shall be promptly commenced. The hearing shall address whether the suspensions should be continued or withdrawn and will be presided over by an administrative law judge from the Michigan Office of Administrative Hearings and Rules. The Director shall announce her decision within 30 days after conclusion of the hearing.
5. This Order shall remain in effect until further order of the Director. The Director retains jurisdiction of the matters contained within and the authority to issue such further Orders as shall be deemed just, necessary, and appropriate.

  
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Anita G. Fox  
Director

**ADVICE OF RIGHTS DURING CIVIL ADMINISTRATIVE LICENSING PROCEEDINGS**

The Department of Insurance and Financial Services has initiated civil administrative proceedings that may affect license(s) issued to you by the Department. If you choose to participate in these proceedings, you may be asked questions and you may be asked to produce information and documents related to the issues involved in the civil administrative proceeding. However, under the Fifth Amendment to the Constitution of the United States, you cannot be compelled to answer questions or give information or documents that might incriminate you in any way.

You have the right to remain silent. Anything that you say during this civil administrative proceeding and any information or documents you provide during this civil administrative proceeding may be used against you in a criminal prosecution. A criminal prosecution may be initiated against you at any time. You have the right to seek the assistance of an attorney of your choosing at any time, including at any time before you answer any questions or provide any information or documents requested by the Department during this proceeding. You are entitled to exercise these rights at any time during this civil administrative proceeding.

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**FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. At all relevant times, Respondent Rand Sre (Respondent Sre) was a licensed resident insurance producer with qualifications in title.
2. At all relevant times, Respondent Peak Title of Michigan (Respondent PTOM) was a licensed resident insurance producer agency with qualifications in title. Respondent Sre is the Designated Responsible Licensed Producer (DRLP) of Respondent PTOM.
3. At all relevant times, Respondent Tobby Rae Jablonski (Respondent Jablonski) was a licensed resident insurance producer with qualifications in title.
4. At all relevant times, Respondent Peak Title Agency Co. (Respondent PTA) was a licensed resident insurance producer agency with qualifications in title. Respondent Jablonski is DRLP of Respondent PTA.
5. Respondent Sre, Respondent Jablonski, Respondent PTOM, and Respondent PTA are collectively referred to as Respondents.
6. Information derived from an investigation and audit conducted by the Department of Insurance and Financial Services (DIFS) demonstrated that Respondents violated the Insurance Code (Code) on numerous occasions, and engaged in a pattern and practice that poses a threat of financial loss and/or significant negative financial ramifications to the public.

7. Emergency action is necessary to protect the public health, safety, and welfare, as DIFS has significant concerns with Respondents' ability to honestly engage in the business of insurance for current and future customers for the reasons set forth below.
8. Without prompt action summarily suspending Respondents' licenses, additional customers will be harmed by Respondents' failure to use reasonable accounting methods, incompetence, untrustworthiness, and diversion of insurance funds. As set forth below, Respondents' conduct demonstrates that they pose an imminent threat of harm:
  - a. While Respondent PTA and Respondent PTOM maintain separate producer licenses and different DRLPs, both entities worked out of the same location, used the same website, shared personnel, and used similar naming/branding.
  - b. Respondent Sre's, Respondent Jablonski's, and Respondent PTA's appointments with First American Title Insurance Company (FATIC) were all cancelled on December 6, 2024. Based on information and belief, FATIC cancelled the appointments because Respondent Sre, Respondent Jablonski, and Respondent PTA did not cooperate with FATIC's initial requests to audit Respondent PTA's account(s)<sup>1</sup>.
  - c. On or about March 20, 2025, DIFS informed Respondent Jablonski and Respondent PTA that it would be conducting a routine audit. Respondent Jablonski and Respondent PTA failed to cooperate or respond to DIFS' audit.
  - d. On or about April 3, 2025, DIFS issued an Order requiring Respondent Jablonski and Respondent PTA to produce information necessary for DIFS to review Respondent PTA's books and records. Respondent Jablonski and Respondent PTA failed to comply with DIFS' order.
  - e. On or about April 22, 2025, WFG National Title Insurance Co. (WFG) notified DIFS that it had cancelled Respondent Sre's and Respondent PTOM's appointments for cause because it had conducted an audit that showed funds had been improperly diverted from Respondent PTOM's escrow account(s) and Respondent Sre failed to materially cooperate with WFG's request for more information about the audit findings.
  - f. Shortly after notifying DIFS of Respondent Sre's and Respondent PTOM's for-cause cancellation, WFG commenced suit against Respondent Sre and Respondent PTOM. The suit alleged, in part, that Respondent Sre and Respondent PTOM mismanaged approximately \$2,600,000.00 in escrow funds and refused to cooperate with WFG's requests to trace the escrow account abnormalities. On or

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<sup>1</sup> Although Respondent Sre failed to report his affiliation with Respondent PTA to DIFS, FATIC listed Respondent Sre as a policy-issuing agent for Respondent PTA.

about May 7, 2025, in response to WFG's filings, the Court appointed a Receiver for PTOM.

- g. On or about April 28, 2025, DIFS issued an Order requiring Respondent Sre and Respondent PTOM to produce specific information necessary to review Respondent PTOM's books and records. Respondent Sre and Respondent PTOM failed to comply with DIFS' order. Respondent Sre and Respondent PTOM alleged that they were not able to comply because Respondent Jablonski had embezzled funds from Respondent PTOM; however, Respondent Sre had not notified DIFS about the purported embezzlement at any point before DIFS issued a formal order requesting information about Respondent PTOM's account records.
- h. On or about May 6, 2025, DIFS received a consumer complaint (hereafter "Complainant 1") alleging, in part, that Respondents failed to pay Complainant 1's property taxes in 2023 and 2024. DIFS obtained a ledger of Complainant 1's escrow account from a third party due to Respondents' failure to cooperate with DIFS' requests for the records. The ledger showed the escrow account had multiple abnormalities. As a representative example of the abnormalities identified, a check for utility payments had purportedly posted in December 2024 but did not clear until April 2025; the ledger stated that over \$100,000.00 had been wired to a mortgage servicer but it did not show that the wire cleared; and the unpaid taxes at issue were posted to the ledger on the same date that Complainant 1 made their complaint, which was more than a year after the taxes were due. WFG issued the title documents associated with Complainant 1's property; only Respondent Sre was appointed with WFG. Although WFG issued the initial title documents associated with Complainant 1's real property transaction, and Respondents collected premiums for the policy, a title insurance policy for Complainant 1's home had not been issued.
- i. On or about May 14, 2025, DIFS received a complaint from a consumer (hereafter, "Complainant 2") regarding Respondent Jablonski and Respondent PTA. Complainant 2 alleged there was over \$200,000.00 in missing escrow funds from a real estate transaction associated with Respondent Jablonski and Respondent PTA and the missing funds resulted in a lender taking action to foreclose on Complainant 2's home. DIFS obtained a ledger of Complainant 2's escrow account from a third party due to Respondents' failure to cooperate with DIFS' requests for the records. The ledger corroborated Complainant 2's allegation that his escrow funds had been mismanaged, as it showed that none of the transactions posted to the account had cleared. The foreclosure notice Complainant 2 provided to DIFS showed that the accounting abnormalities seen on the ledger resulted in foreclosure of Complainant 2's home.
- j. In and around June 2025, Respondent PTOM's court-appointed Receiver filed their first report with the Court. The Receiver's report identified the following abnormalities with Respondent's escrow funds: Respondent PTOM's trust bank accounts had no funds available to complete outstanding real estate closing obligations; a ledger of

Respondent PTOM's unreconciled, uncleared transactions showed a negative balance of over \$1,300,000.00; and Respondent Sre had never reconciled Respondent PTOM's financials. Further, the Receiver found Respondent Sre was aware that Respondent Jablonski had been inappropriately wiring funds associated with Respondent PTOM and/or Respondent PTA's account; despite this awareness, Respondent Sre and/or Respondent PTOM continued to exchange large sums of money with Respondent Jablonski and/or Respondent PTA without clearly documenting the purpose of the fund exchange, as depicted below:

Date	Amount	Type	No.	Payee	Memo
03/07/2025	\$ 22,000.00	Check	4124	Peak Title Agency Co.	Payoff Shortage Reimbursement / PTOM - Misc
03/07/25	\$ 28,000.00	Check	4125	Peak Title Agency Co.	Reimbursement PTOM
03/07/25	\$ 45,000.00	Check	4165	Peak Title Agency Co.	Reimbursement PTOM
03/12/25	\$ 6,500.00	Check	4159	Tobby Jablonski	Reimbursement PTOM

9. As licensees, Respondents knew or had reason to know that Section 1239(1)(b) of the Code, MCL 500.1239(1)(b), provides justification for sanctions for "improperly withholding, misappropriating, or converting any money or property received in the course of doing insurance business."
10. As licensees, Respondents knew or had reason to know that Section 1239(1)(g) of the Code, MCL 500.1239(1)(g), provides justification for sanctions 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".
11. As licensees, Respondents knew or had reason to know that Section 1239(2)(e) of the Code, MCL 500.1239(2)(e), provides justification for sanctions for "[v]iolating any insurance laws or violating any regulation, subpoena, or order of the director or of another state's insurance commissioner."
12. As licensees, Respondents knew or had reason to know that Section 1207(1) of the Code, MCL 500.1207(1), provides "[a]n agent is a fiduciary for all money received or held by the agent in the agent's capacity as an agent." As set forth above, Respondents violated MCL 500.1207(1) by mismanaging escrow funds.
13. As licensees, Respondents knew or had reason to know that Section 1207(2) of the Code, MCL 500.1207(2), provides "[a]n agent shall treat all premiums and return premiums as fiduciary money and segregate the premiums from the agent's own money..." As set forth above, Respondents violated MCL 500.1207(2) by causing, or allowing to be caused, fiduciary funds to be commingled with Respondents' own funds.
14. As licensees, Respondents knew or had reason to know that Section 1207(5) of the Code, MCL 500.1207(5), provides "[a]n agent shall use reasonable accounting methods to record money received in the agent's fiduciary capacity, including the receipt and distribution of premiums due each of the agent's insurers." As set forth above, Respondents violated MCL 500.1207(5) by failing to

- reconcile their escrow accounts and for collecting insurance premiums for title policies that had not been issued.
15. As licensees, Respondents knew or had reason to know that Section 1207(6) of the Code, MCL 500.1207(6), provides “[a]n agent who receives fiduciary money must document the receipt of the fiduciary money in sufficient detail to determine, at a minimum, the date received, the name of the payee, the amount received, and a description of the money.” As set forth above, Respondents violated MCL 500.1207(6) by failing to properly document descriptions of escrow fund transactions, including failing to provide a description of the transfer of funds among Respondents.
  16. As licensees, Respondents knew or had reason to know that Section 1207(10) of the Code, MCL 500.1207(10), provides “[r]ecords required by this section must be open to examination by the director.” As set forth above, Respondents violated MCL 500.1207(10) by failing to comply with DIFS’ requests for records that Respondents were required to maintain under MCL 500.1207.
  17. Respondents are subject to sanctions pursuant to MCL 500.1239(1)(g) and MCL 500.1239(2)(e) for the MCL 500.1207 violations set forth above.
  18. Respondents are subject to sanctions pursuant to MCL 500.1239(1)(b) for violating MCL 500.1207(2) and for collecting premiums for title policies that were not issued, as set forth above.
  19. As licensees, Respondents knew or had reason to know that Section 4503(g)(i) of the Code, MCL 500.4503(g)(i), provides that a fraudulent insurance act includes diverting, attempting to divert, or conspiring to divert “funds of an insurer or of other persons in connection with any of the following:... (i) [t]he transaction of insurance or reinsurance.” Here, Respondents violated MCL 500.4503(g)(i) by removing funds from escrow accounts that were part of title insurance transactions, collecting premiums for title insurance policies that had not been issued, and/or concealing the conversion of escrow funds that were part of title insurance transactions by willfully failing to comply with DIFS and WFG’s lawful requests to ascertain the location of the escrow funds. Respondents are subject to sanctions pursuant to MCL 500.1239(1)(b) and (g), and MCL 500.1239(2)(e) for violating MCL 500.4503(g)(i), as set forth above.
  20. As licensees, Respondents knew or had reason to know that Section 249(a) of the Code, MCL 500.249(a), grants power to DIFS to examine licensees and review records for the purposes of ascertaining compliance with the provisions of the insurance laws of the state. As set forth above, Respondents violated MCL 500.249(a) and are subject to sanctions pursuant to MCL 500.1239(2)(e) for failing to respond to DIFS’ repeated requests to ascertain the status of Respondents’ escrow accounts.
  21. As licensees, Respondents knew or had reason to know that Section 1205(2)(b) of the Code, MCL 500.1205(2)(b), requires that a business entity acting as an insurance producer has a designated individual licensed producer who is responsible for the business entity’s compliance with this state’s insurance laws, rules, and regulations.
  22. As DRLPs of Respondent PTA and Respondent PTOM, respectively, Respondent Jablonski and Respondent Sre failed to fulfill their duty to ensure compliance with the laws, rules, and regulations of the State of Michigan as indicated by the Code violations described herein. By their failure to

ensure Respondents' compliance with the Code, as required by MCL 500.1205(2)(b), Respondent Sre and Respondent Jablonski provided justification for sanctions pursuant to MCL 500.1239(1)(g) and MCL 500.1239(2)(e).

23. As licensees, Respondents knew or had reason to know that Section 1239(5) of the Code, MCL 500.1239(5), provides that "[t]he license of a business entity may be suspended, revoked, or refused if the director finds, after hearing, that an individual licensee's violation was known or should have been known by 1 or more of the partners, officers, or managers acting on behalf of the partnership or corporation and the violation was not reported to the director and corrective action was not taken."
24. Respondents' violations of the Code, as set forth above, were either known, or should have been known, by one or more of Respondent PTOM and Respondent PTA's partners, officers, or managers, but no report was made to the Director nor was corrective action taken. Respondent PTOM and Respondent PTA are thus subject to sanctions pursuant to MCL 500.1239(5).
25. The Code violations set forth herein demonstrate that Respondents pose an imminent risk to the public's health, safety, and welfare, as Respondents are either intentionally or negligently misappropriating funds they hold in a fiduciary capacity, their actions are affecting rights to real property, and they are furthering their misappropriation by refusing to cooperate with attempts to trace the location of the funds. Summary suspension of Respondents' insurance producer licenses is therefore warranted.