

STATE OF MICHIGAN  
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES

Before the Director of the Department of Insurance and Financial Services

In the matter of:

**Cedar Hawk Title Company**  
Unlicensed

**Enforcement Case No. 21-16342**

**Victoria Larsen**  
Unlicensed

**Tabria Josey,**  
Unlicensed,

Respondents.

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Issued and entered  
on this 11th day of August, 2021  
by Randall S. Gregg  
Senior Deputy Director

**FINAL ORDER TO CEASE AND DESIST**

**I. BACKGROUND**

This matter concerns an enforcement action initiated by Department of Insurance and Financial Services (DIFS) staff related to alleged unlicensed and fraudulent activity engaged in by Respondents Cedar Hawk Title Company, Victoria Larsen, and Tabria Josey (collectively Respondents). Following DIFS' investigation, DIFS concluded that Respondents committed acts in violation of the Michigan Insurance Code of 1956 (Code), 1956 PA 218, as amended, MCL 500.100 *et seq.*, including the unlicensed practice of insurance, the issuance of fake title insurance, and the commission of a fraudulent insurance act under Sections 1201a(1), 2271(b), and 4503(g)(i) of the Code, MCL 500.1201a(1), MCL 500.2271(b), and MCL 500.4503(g)(i).

Accordingly, on February 8, 2021, pursuant to Section 251 of the Code, MCL 500.251, DIFS issued an Order to Cease and Desist with Statement of Findings and Notice of Opportunity for Hearing (Initial Order) to Respondents. A copy of the Initial Order is attached to this Final Order to Cease and Desist. The Initial Order was mailed to Respondents via first class and certified mail to their last known addresses of record. No mail was returned as undeliverable, no response from Respondents was received, and no hearing on the Initial Order was requested.

On May 24, 2021, DIFS filed a Motion for Entry of Final Order to Cease and Desist (Motion). Respondent Tabria Josey (Josey) filed a response to the Motion but did not contest the allegations contained in the Initial Order by requesting a hearing. Given the remaining Respondents' failure to respond to the Motion, and Respondent Josey's deficient response, DIFS' motion is granted. Moreover, because the Initial Order was

unchallenged, both the factual and legal allegations contained in it are accepted as true. Based upon the findings contained in the Initial Order as well as DIFS' files and records regarding this enforcement action, the Senior Deputy Director makes the following Findings of Fact and Conclusions of Law.

## II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

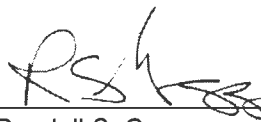
The Statement of Findings in the Initial Order are adopted and made a part of this Final Order as Findings of Fact, and the Conclusions of Law stated as follows:

1. The Director is statutorily charged with the responsibility and authority to administer and implement the Code. See MCL 500.100, *et seq.*
2. Respondents knew or should have known that, pursuant to Section 1201a(1) of the Code, MCL 500.1201(a)(1), it is a violation for a person to sell, solicit, or negotiate insurance in this state for any line of insurance without first obtaining a license or qualification. By purporting to solicit and sell title insurance in the manner described in the Statement of Findings without a license, Respondents acted as unlicensed insurance producers in violation of Section 1201a(1) of the Code, MCL 500.1201a(1).
3. Respondents knew or should have known that Section 2271(b) of the Code, MCL 500.2271(b), prohibits any person from preparing or issuing "a certificate of insurance that contains any false or misleading information concerning an insurance policy referenced in the certificate of insurance." By issuing the false Commitment for Title Insurance as described in the Statement of Findings, Respondents violated Section 2271(b) of the Code, MCL 500.2271(b).
4. Respondents knew or should have known that, pursuant to Section 4503(g)(i) of the Code, MCL 500.4503(g)(i), it is a fraudulent insurance act to divert, attempt to divert, or conspire to divert funds of an insurer or of other persons in connection with the transaction of insurance. By attempting or conspiring to divert funds from customer SW for the purchase of non-existent title insurance, as described in the Statement of Findings, Respondents committed a fraudulent insurance act as defined by Section 4503(g)(i) of the Code, MCL 500.4503(g)(i).
5. Section 150 of the Code, MCL 500.150, authorizes DIFS' Director to order the payment of a civil fine of up to \$5,000 for each violation of the Code if the person knew or reasonably should have known that he or she was in violation of the Code. Section 150 further authorizes DIFS' Director to order a civil fine of \$20,000 for each knowing violation of a cease and desist order. See MCL 500.150(1)(a) & (3).
6. Respondents were properly served with notice of this action and were given an opportunity to request a hearing and contest the charges contained within the Initial Order. None of the Respondents, however, requested a hearing to contest any of the allegations contained in the Initial Order. As a result, Respondents have waived their right to contest either the factual or legal conclusions contained therein.

### III. ORDER

Therefore, it is ORDERED that:

1. The Initial Order is adopted and made part of this Final Order to Cease and Desist.
2. Pursuant to Sections 150, 251, 1244, and 2277 of the Code, MCL 500.150, 500.251, 500.1244, and 500.2277, Respondents shall immediately CEASE AND DESIST from all activities in violation of the Code as described herein, and in the Statement of Findings contained in the Initial Order.
3. Respondents shall pay to the State of Michigan civil fines in this matter in the total amount of \$15,000, as follows:
  - a. Pursuant to Section 1244(1)(a) of the Code, MCL 500.1244(1)(a), Respondent Victoria Larsen shall pay a fine of \$5,000 for violating Section 1201a(1) of the Code, MCL 500.1201a(1), by knowingly and intentionally practicing insurance without a license.
  - b. Pursuant to Section 2277 of the Code, MCL 500.2277, Respondent Victoria Larsen shall also pay a fine of \$2,500 for violating Section 2271 of the Code, MCL 500.2271, by knowingly and intentionally issuing false insurance documents.
  - c. Pursuant to Section 1244(1)(a) of the Code, MCL 500.1244(1)(a), Respondent Tabria Josey shall pay a fine of \$5,000 for violating Section 1201a(1) of the Code, MCL 500.1201a(1), by knowingly and intentionally practicing insurance without a license.
  - d. Pursuant to Section 2277 of the Code, MCL 500.2277, Respondent Tabria Josey shall also pay a fine of \$2,500 for violating Section 2271 of the Code, MCL 500.2271, by knowingly and intentionally issuing false insurance documents.



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Randall S. Gregg  
Senior Deputy Director  
Department of Insurance and Financial Services

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**Issued and entered  
on February 8, 2021  
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Senior Deputy Director**

**ORDER TO CEASE AND DESIST WITH STATEMENT OF FINDINGS  
AND NOTICE OF OPPORTUNITY FOR HEARING**

Pursuant to Section 251 of the Michigan Insurance Code (Code), MCL 500.251, and after reviewing evidence of the conduct described in the attached Statement of Findings, and

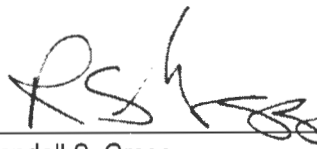
**WHEREAS** the Director of the Department of Insurance and Financial Services finds that immediate action is necessary and appropriate in the public interest for the protection of the public health, safety, and welfare and consistent with the purposes fairly intended by public policy and provisions of the Code,

**IT IS THEREFORE ORDERED THAT:**

1. Respondents shall immediately **CEASE AND DESIST** from all activities in violation of the Code as described in the Statement of Findings.
2. A copy of this Order shall be immediately served upon Respondents and shall be effective upon the date of service.
3. Respondents will have 30 calendar days after the service of this Order to contest it by requesting a hearing. Within 10 calendar days after receiving the request, the hearing process shall commence. This Order shall remain in effect until further order of the Director. 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 517-284-8843.

4. Any such hearing held shall address the following issues:
  - a. The facts set forth in the Statement of Findings.
  - b. The continuation of the Order to Cease and Desist.
  - c. Restitution to be paid by the Respondent.
5. If a hearing is requested, an administrative law judge from the Michigan Office of Administrative Hearings and Rules shall preside over any such hearing.
6. The Director retains jurisdiction of the matters contained herein and the authority to issue such further Orders as shall be deemed just, necessary, and appropriate.
7. Pursuant to Section 251(6) of the Code, MCL 500.251(6), a person who violates or otherwise fails to comply with an Order to Cease and Desist is subject to one or more of the following:
  - a. Payment of a civil fine of not more than \$1,000 for each violation not to exceed an aggregate civil fine of \$30,000. However, if the person knew or reasonably should have known the conduct was in violation of the cease and desist order, the person shall be subject to a civil fine of not more than \$25,000 for each violation not to exceed an aggregate civil fine of \$250,000.
  - b. Suspension or revocation of the person's license or certificate of authority.
  - c. Complete restitution, in the form, amount, and within the period determined by the Director, to all persons in Michigan damaged by the violation or failure to comply.



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Senior Deputy Director

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**STATEMENT OF FINDINGS**

1. Pursuant to Section 251(1) of the Code, MCL 500.251(1), the Director is empowered to issue a cease and desist order upon finding any of the following:
  - (a) A person is conducting transactions of insurance for which a certificate of authority is required by this act without having obtained a certificate of authority.
  - (b) A person is acting as an insurance agent, solicitor, adjuster, or counselor without a license as required by this act.
  - (c) A person is engaged in an act or practice in the business of insurance for which authority from or notification to the commissioner is required by this act and the person has not received authority or given notification.
  - (d) A person authorized to engage in the business of insurance under this act is engaged in conduct that presents an immediate danger to public health, safety, or welfare. MCL 500.251(1).
2. Under Section 1201a(1) of the Code, it is a violation for a person to sell, solicit, or negotiate insurance in this state for any line of insurance without first obtaining a license or qualification for that line. MCL 500.1201a(1).
  - a. "Negotiate" means the act of conferring directly with or offering advice directly to a purchaser or prospective purchaser of a particular contract of insurance concerning any of the substantive benefits, terms, or conditions of the contract, provided that the person engaged in that act either sells insurance or obtains insurance from insurers for purchasers. MCL 500.1201(m).

- b. "Sell" means to exchange a contract of insurance by any means, for money or its equivalent, on behalf of an insurance company. MCL 500.1201(n).
  - c. "Solicit" means attempting to sell insurance or asking or urging a person to apply for a particular kind of insurance from a particular company. MCL 500.1201(o).
3. Under Section 4503(g)i of the Code, MCL 500.4503(g)i, it is a fraudulent insurance act to divert, attempt to divert, or conspire to divert funds of an insurer or of other persons in connection with the transaction of insurance.
4. Section 2271(b) of the Code, MCL 500.2271(b), prohibits any person from preparing or issuing "a certificate of insurance that contains any false or misleading information concerning an insurance policy referenced in the certificate of insurance."
5. DIFS staff received information about possible unlicensed activity by Respondents, Cedar Hawk Title Company (Cedar Hawk), Victoria Lansen, and Tabria Josey. Cedar Hawk, Lansen, and Josey are collectively referred to herein as Respondents. A review of DIFS' records revealed that none of the Respondents are licensed under the Code. As a result, DIFS initiated an investigation into Respondents' activities and discovered the following facts:
  - a. On or about November 30, 2020, Respondent Lansen purported to sell title insurance to customer SW. Lansen signed what purported to be a "Commitment for Title Insurance Issued by Cedar Hawk Title Company" for a property located in Michigan. The document indicated that both buyer's and seller's policies in the amount of \$165,000.00 would be obtained from insurer Old Republic National Title Insurance Company (Old Republic). The "Commitment to Title Insurance" document also contained the logo of Old Republic on the bottom portion of its pages. In conjunction with this transaction, Lansen requested two wire transfers from customer SW in the amount of \$140,875.00 and \$7,970.00, respectively. Although the monies were wired, SW became suspicious and, with the assistance of the Secret Service, was able to successfully cancel the transactions before the monies were transferred to the receiving bank account.
  - b. Old Republic provided a statement to DIFS indicating that the document "Commitment for Title Insurance" described above was fraudulent in nature and that it was unaware of the transaction.
  - c. On December 11, 2020, DIFS' investigative office received a phone call from Respondent Josey. During that call, Josey claimed that she was the owner of Cedar Hawk and that Lansen was her employee. She stated that Lansen falsely told her that she was licensed in Michigan. She further stated that she was not aware of any licensing problems until the agency bank account was frozen.
  - d. On December 22, 2020, Josey responded to an email inquiry from DIFS and stated that she had spoken with Lansen and that Cedar Hawk was not accepting business at that time because it was not licensed. She also stated that Lansen had operated on her own and had been obtaining clients since early November.

- e. Cedar Hawk maintains a website at [www.cedarhawktitle.com](http://www.cedarhawktitle.com) on which it purports to be located at 28475 Greenfield Road Southfield, MI 48076. The website further indicates that its service area is "Well... The entire United States of America!"
6. By soliciting and selling title insurance, Respondents are acting as unlicensed insurance producers in violation of Section 1201a(1) of the Code, MCL 500.1201a(1).
7. By issuing the false "Commitment for Title Insurance" as set forth in paragraph 5 above, Respondents violated Section 2271(b) of the Code, MCL 500.2271(b).
8. By attempting or conspiring to divert funds from customer SW for the purchase of non-existent title insurance, Respondents have committed a fraudulent insurance act as defined by Section 4503(g)i of the Code, MCL 500.4503(g)i.
9. By violating Chapter 12 of the Code in the manner described above, Respondents are subject to sanctions under Section 1244 of the Code, MCL 500.1244, which may include civil fines of up to \$50,000.00 and restitution. By violating Chapter 22 of the Code in the manner described above, Respondents are subject to sanctions under Section 2277 of the Code, MCL 500.2277, which may include civil fines of up to \$25,000.00. Furthermore, Respondents' violation of Section 4503(g)i of the Code is considered a felony under Section 4511 of the Code, MCL 500.4511.